

**A RESOLUTION IMPLEMENTING INTERNAL CONTROL FOR LAND
BANK FINANCES**

WHEREAS, on February 14th, 2017 the Board of Directors of the Nassau County Land Bank Corporation duly convened a meeting and a quorum existed, and;

WHEREAS, the Board of Directors was requested to approve a resolution to create a system of internal control governing all Land Bank finances, and;

WHEREAS, the Board of Directors voted affirmatively and unanimously for internal controls to be put in place; now, therefore, be it

RESOLVED, that effective immediately the Nassau County Land Bank Corporation has adopting the internal control policy attached hereto:

Nassau County Land Bank Corporation

INTERNAL CONTROL POLICY

PURPOSE

The following outlines the policy and procedures used by the Nassau County Land Bank Corporation (NCLB) to ensure property internal controls on NCLB finances.

Invoices are reviewed by the Executive Director or duly delegated staff member. After review, the Executive Director prepares, signs, and attaches a voucher for payment. This voucher details the payee, expense account description, project description (e.g. property address), and class type with which the payment is affiliated and amount to be paid. The Executive Director shall cause the voucher, along with the invoice or other supporting documentation as applicable, to be delivered to the bookkeeper. The bookkeeper then enters makes a record of the invoice which is synchronized with the NCLB ledger, in accordance with the voucher.

Two authorized signers are required for all disbursements. The first signature is that of the Executive Director affixed to the voucher and the second is in the form of the Treasurer or other authorized signer approving/paying the disbursement by signing a check or other authorized method of payment. This second authorization is required in order for staff to issue a check or other method of payment to the vendor and may not be completed until the signed voucher is submitted by the Executive Director and the invoice is entered by the bookkeeper. The bookkeeper will not enter an invoice or prepare checks for signature absent a signed voucher. Authorized signatories may include any of the following: Executive Director, Chair of the Board, Vice Chair of the Board, and Board Treasurer, as directed by the Board of Directors from time to time.

When a one-time or recurring payment, for example an online payment via debit from a NCLB bank account, is arranged with a vendor, the voucher shall be signed by two authorized signers in order to document two-party approval of the transaction. These transactions shall be reported to the bookkeeper for entry into the NCLB books and ledger.

Internal transfers between accounts for routine cash management may be processed by any signatories on the applicable account. Any withdrawals made in person requiring a withdrawal slip shall be authorized by two signatories on the applicable account. Any reimbursement payment to staff or Board members may be processed by any signatories on the applicable account only after approval in accordance with the NCLB Compensation, Reimbursement and Attendance Policy.

Bank statements are reviewed by the Executive Director and then forwarded to the bookkeeper for reconciling of accounts. Bookkeeping staff shall also have online viewing rights to all NCLB bank accounts in order to monitor transaction activity on a daily basis for the purposes of fraud-prevention and to reconcile accounts in a timely manner. All bank accounts shall be reconciled on a monthly basis by the bookkeeper and reviewed by the Treasurer. A summary of account activity will be provided to the board of directors at their monthly meetings.