



**VENTURA COUNCIL
OF GOVERNMENTS**

**Thursday, September 10, 2026, 3:00 p.m.
Camarillo City Hall
Council Chambers
601 Carmen Dr, Camarillo, CA 93012
AGENDA**

Persons who require accommodation for any audio, visual, language, or other disability to review an agenda, or to participate in a meeting of the Ventura Council of Governments, per the Americans with Disabilities Act (ADA), Title II, 28 CFR §§ 35.102–35.104, and California Government Code Section 54954.2, may obtain assistance by requesting such accommodation by calling VCOG staff at 805-501-6182 or emailing david@venturacog.org. Any such request for accommodation must be made at least 48 hours before the scheduled meeting for which assistance is requested. Copies of staff reports are on file with the Executive Director of the Ventura Council of Governments and are available for public inspection.

**AGENDA REPORTS AND OTHER DISCLOSABLE PUBLIC RECORDS RELATED TO OPEN SESSION
AGENDA ITEMS ARE ALSO AVAILABLE ON THE VCOG WEBSITE UNDER AGENDA AND MINUTES AT
www.venturacog.org.**

1. CALL TO ORDER AND FLAG SALUTE

2. ROLL CALL

3. ADDITIONS/DELETIONS TO THE AGENDA – Members who wish to include an emergency action item on this meeting's agenda or wish to discuss a particular agenda item listed on this meeting's Consent Calendar should inform the Chair at this time.

4. PUBLIC COMMENT

At this time, public comments received in advance by VCOG Staff will be read aloud into the meeting record. Individual Board Members may briefly respond to Public Comments or ask clarifying questions.

5. REPORTS AND ANNOUNCEMENTS FROM COUNCIL MEMBERS

6. EXECUTIVE DIRECTOR'S REPORT – A written report will be distributed in advance of the meeting.

MEMBERS

City of Camarillo
David Tennesen, Chair
Kevin Kildee, Alternate

City of Fillmore
Carrie Broggie, Member
Albert Mendez, Alternate

City of Moorpark
Chris Enegren, Immed. Past Chair
Tom Means, Alternate

City of Ojai
Leslie Rule, Member
Kim Mang, Alternate

City of Oxnard
Bert Perello, Member
Aaron Starr, Alternate

City of Port Hueneme
Laura Hernandez, Member
Jess Lopez, Alternate

City of San Buenaventura
Bill McReynolds, Member
Jeannette S. Palacios, Alternate

City of Santa Paula
Leslie Cornejo, Chair-elect
Jenny Crosswhite, Alternate

City of Simi Valley
Elaine Litster, Member
Mike Judge, Alternate

City of Thousand Oaks
David Newman, Member
Bob Engler, Alternate

County of Ventura
Janice Parvin, Member
Jeff Gorell, Alternate

7. **AGENCY REPORTS** – Reports or Oral Presentations by Agency Representatives Attending
 - A. Broadband Team Update & Report on Ventura County Broadband Project
 - B. Southern California Association of Governments
 - C. Ventura County Transportation Commission
 - D. League of California Cities
 - E. County of Ventura - Legislative Analyst
 - F. Metropolitan Water District of Southern California
8. **CONSENT CALENDAR**
 - A. **Summary of July 9, 2026 Meeting** p. 3 - Approve Meeting Summary for the July 9, 2026 VCOG Special Meeting. **Action:** Approve Meeting Summary.
 - B. **Financial Report** p. 6 - Approve Ventura Council of Governments Financial Report for the Budget Period from July 1, 2026, through August 30, 2026. **Action:** Approve Financial Report
 - C. **Register of Warrants & Debit Card Transactions** p.9 - Approve the Register of Warrants for Expenditures and Debit Card Transactions incurred from July 1, 2026, through August 31, 2026. **Action:** Approve Register of Warrants and Debit Card Transactions.
 - D. **Resolution 2026-03 Adopting a Financial Controls Policy** p.x - Approve Resolution 2026-03 establishing a Financial Controls Policy for VCOG in accordance with auditor recommendations.
9. **PRESENTATION ITEMS**
 - A. **E-bikes in Ventura County.** Commander Eric Tennessen from the Ventura County Sheriff's Office will present to the Council and be available for questions.
10. **COUNCIL MEMBER REQUESTS FOR FUTURE AGENDA ITEMS**

Any Council Member present may propose items for placement on a future agenda. Members should limit their proposed topics to issues that conform to VCOG's adopted Program of Priorities. Members may discuss whether to place the item on a future agenda and its description.
11. **ADJOURNMENT: Next Meeting - November 12, 2026 – City of Camarillo City Hall, Council Chambers, 601 Carmen Drive, Camarillo.**



ITEM 8A

MEETING SUMMARY

Notice: Proper teleconference locations were listed on the agenda. The public was provided the means to observe the meeting and address the legislative body contemporaneously via Zoom.

Thursday, July 9, 2026

1. **CALL TO ORDER & FLAG SALUTE** – The meeting was called to Order at 3:06 PM by Chair Tennessen.

2. **ROLL CALL:**

- David Tennessen, Chair, City of Camarillo
- Carrie Broggie, City of Fillmore
- Laura Hernandez, City of Port Hueneme
- Elaine Litster, City of Simi Valley
- Leslie Cornejo, City of Santa Paula
- Bert Perello, City of Oxnard
- Leslie Rule, City of Ojai

Absent:

- Chris Enegren, Immediate Past Chair, City of Moorpark
- David Newman, City of Thousand Oaks
- Bill McReynolds, City of San Buenaventura
- Janice Parvin, County of Ventura

Staff Present:

- David Pollock, VCOG Executive Director

Partner Agency Representatives and Agency Support Staff Present:

- Brian Chong, Assistant to the City Manager, City of Moorpark
- Mina Layba, Legislative Affairs Manager, City of Thousand Oaks
- Rachel Wagner, Senior Government Affairs Officer, Southern California Association of Governments

3. **Additions/Deletions to the Agenda** - There were no additions or deletions to the meeting agenda, and no Consent Calendar Items were pulled for discussion.

4. **Public Comment:** There were no public comments.

5. **Reports and Announcements from Council Members** - There were no announcements.

6. **Executive Director's Report:** David Pollock provided an oral report summarizing his written report. He also let the Council know that item 8E on the consent calendar, the VCOG Revised Budget, presented him with a conflict of interest given that it adds additional funding from SCAG for the REAP 2.0 grant program, including a line item to

which he charges his grant administrative time. He was unable to find a way to recuse himself from discussions regarding additional funding because he had no one to delegate his responsibilities to. He discussed this situation with legal counsel and determined that it fell under exceptions to California Government Code 1090 and the Political Reform Act.

8. **Agency Reports**

- A. Broadband Team Update & Report on Ventura County Broadband Project - Bruce Stenslie, executive director of the Economic Development Collaborative of Ventura County, was present to provide the Council with an update on potential future funding for the Local Agency Technical Assistance (LATA) grant program.
- B. Southern California Association of Governments - There was no report
- C. Ventura County Transportation Commission - There was no report
- D. League of California Cities - There was no report
- E. County of Ventura - Legislative Analyst - There was no report.
- F. Metropolitan Water District of Southern California: Nicole Richardson was present to provide the Council with an update on water-related issues.

9. **CONSENT CALENDAR**

- A. **Summary of May 21, 2026 Meeting** - Approve Meeting Summary for the May 21, 2026 VCOG Meeting. Action: Approve Meeting Summary.
- B. **Financial Report** - Approve the Ventura Council of Governments Financial Report for the Budget Period from July 1, 2025, through June 30, 2026. Action: Approve Financial Report.
- C. **Register of Warrants & Debit Card Transactions** - Approve the Register of Warrants for Expenditures and Debit Card Transactions incurred from May 9, 2026, through June 30, 2026. Action: Approve Register of Warrants and Debit Card Transactions.
- D. **VCOG Audited Financial Statements - 2024-2025.** Receive and file Ventura Council of Governments Independent Auditors' Report on Internal Control Over Financial Reporting and on Compliance and Other Matters Based on an Audit of Financial Statements Performed in Accordance with Government Auditing Standards for the Period of July 1, 2024, through June 30, 2025.
- E. **VCOG Revised Budget.** Action: Review and approve the proposed VCOG Revised Budget for FY 2026-2027 and adopt VCOG Resolution 2026-02.

A **Motion** was made by Council Member Hernandez, with a **Second** by Vice Chair Leslie Cornejo, to approve items A through E of the Consent Calendar. Roll Call Vote Recorded as follows: Ayes: 7; Nays: 0. The Motion Carried.

10. **PRESENTATION ITEMS**

- A. **Unpermitted Sidewalk Vending.** Ventura County Environmental Health Division Director Charles Genkel and Code Compliance Director Jonathan Wood briefed the Council on current efforts to curtail unpermitted sidewalk vending throughout the County.

11. **BOARD MEMBER COMMENTS AND REQUESTS FOR FUTURE AGENDA ITEMS:** The Council discussed the importance of taking up the e-bike issue. Council Member Leslie Rule asked that the Council receive a briefing at a future meeting on the next Regional Housing Needs Assessment process.
12. **ADJOURNMENT:** The meeting was adjourned by Chair Tennessen at 4:48 PM.



ITEM 8B

MEMORANDUM

TO: VCOG Members and Alternates

FROM: David Pollock, Executive Director

SUBJECT: Financial Report

DATE: September 10, 2026

Recommendation:

Approve the Financial Report for the period July 1, 2026, through August 31, 2026.

Discussion:

This report transmits the Ventura Council of Governments (VCOG) Financial reports for the Budget Period from July 1, 2026, through August 31, 2026.

Investments:

The objectives of VCOG's adopted Investment Policy are safety, liquidity, and yield, with safety as the foremost objective. Prudence, ethics, and delegation of authority are the policy's standards of care. Below is a summary of VCOG's investments that comply with the VCOG Investment Policy:

Institution	Investment Type	Maturity Date	Interest-FY to Date- 7/1/26 to 8/31/26	Rate	Balance
Bank of America	Savings	N/A	\$0.14	0.04%*	\$2,621.78

* Variable

ATTACHMENTS: Balance Sheet – As of August 31, 2026
Budget vs. Actual Report- July 1, 2026, through August 31, 2026

Ventura Council of Governments

Balance Sheet
As of Aug 31, 2026

	Total
Assets	
Current Assets	
Bank Accounts	
BofA - 9045	91,345.07
BofA MM - 2635	2,621.64
Total for Bank Accounts	\$93,966.71
Accounts Receivable	
Accounts Receivable (A/R)	121,910.54
Total for Accounts Receivable	\$121,910.54
Other Current Assets	\$0.00
Total for Current Assets	\$215,877.25
Other Assets	\$0.00
Total for Assets	\$215,877.25
Liabilities and Equity	
Liabilities	
Current Liabilities	
Accounts Payable	
Accounts Payable (A/P)	17,867.64
Total for Accounts Payable	\$17,867.64
Other Current Liabilities	\$0.00
Total for Current Liabilities	\$17,867.64
Long-term Liabilities	\$0.00
Total for Liabilities	\$17,867.64
Equity	
Opening Balance Equity	111,291.04
Year End Close Out Account	48,600.06
Net Income	38,118.51
Total for Equity	\$198,009.61
Total for Liabilities and Equity	\$215,877.25

Ventura Council of Governments

Profit and Loss
July-August, 2026

	Total
Income	
Restricted Income	
SCAG - REAP 2.0 Contract Income	81,941.54
Total for Restricted Income	\$81,941.54
Unrestricted Income	
Annual Dinner Sponsorship	8,500.00
Dues Assessments	77,990.00
Total for Unrestricted Income	\$86,490.00
Total for Income	\$168,431.54
Gross Profit	\$168,431.54
Expenses	
Executive Administration	11,047.50
Other Types of Expenses	
Bank Fees	2.00
LATA Grant Expenses	55,838.51
Total for Other Types of Expenses	\$55,840.51
REAP 2.0 Project Costs	\$802.50
TASK 1 - Program Administration	892.50
TASK 2 - Project Management	3,525.04
TASK 5 - Infill Redevelopment Action Plan	4,070.00
TASK 6 - On Call Planning Assistance	51,067.53
Total for REAP 2.0 Project Costs	\$60,357.57
Unrestricted Expenses	
Accounting Fees	1,373.25
Annual Dinner	1,632.50
Postage, Mailing Service	35.90
Printing and Copying	25.80
Total for Unrestricted Expenses	\$3,067.45
Total for Expenses	\$130,313.03
Net Operating Income	\$38,118.51
Net Income	\$38,118.51



VENTURA COUNCIL
OF GOVERNMENTS

ITEM 8C

MEMORANDUM

TO: Council Members and Alternates

FROM: David Pollock, Executive Director 

SUBJECT: Register of Warrants and Debit Card Transactions

DATE: September 10, 2026

Recommendation:

Approve the Register of Warrants for expenditures and Debit Card Transactions incurred from July 1 through August 31, 2026.

Discussion:

This report presents expenditures, including bank debit card transactions incurred by the Ventura Council of Governments for the period from July 1 through August 31, 2026. It is prepared in addition to the Financial Report to ensure the Council is fully informed about actual expenditures for services and other organizational costs.

ATTACHMENTS: Warrant and Debit Card Registers

Register of Warrants
Ventura Council of Governments
July 9, 2026

Transactions from July 1 through August 31, 2026

<u>Check/Transaction#</u>	<u>Date</u>	<u>Paid To</u>	<u>Inv. Date</u>	<u>Description</u>	<u>Amount</u>
Check 795	07/02/26	Propulsive Executive Services	07/01/26	Executive Director Services	\$5,550.00
B15UDEDKYW3V76A	07/08/26	Placeworks	07/01/26	REAP 2.0 Services	\$4,852.50
B15YEEZMMV3V769	07/08/26	Placeworks	07/01/26	REAP 2.0 Services	\$3,737.50
B15NAOVWSY3V768	07/08/26	Propulsive Executive Services	07/01/26	REAP 2.0 Services	\$675.00
Check 791	07/09/26	Economic Development Collaborative	07/08/26	LATA Grant Services	\$54,081.15
Check 800	07/09/26	MNS Engineers, Inc.	07/01/26	REAP 2.0 Services	\$10,038.00
B15FJBGXPQ3VBDE	07/09/26	VC Digital	07/08/26	Printing Services	\$25.80
Check 798	07/14/26	Opticos Design, Inc.	07/08/26	REAP 2.0 Services	\$12,491.00
Check 799	07/14/26	Sanbell	07/08/26	REAP 2.0 Services	\$9,032.00
Check 797	07/15/26	Economic & Planning Systems	07/08/26	REAP 2.0 Services	\$12,058.75
B15CBBSCZM3VXQD	07/15/26	Command Performance	07/14/26	Catering deposit for Oct dinner meeting	\$1,000.00
B15ENQHKEN3VXQE	07/15/26	Camarillo Ranch	07/14/26	Venue fees for Oct dinner meeting	\$632.50
B15FPZTTZB3W6ON	07/17/26	MNS Engineers	07/08/26	REAP 2.0 Services	\$4,357.50
B15STAAULH3W6OM	07/17/26	Opticos	07/09/26	REAP 2.0 Services	\$3,507.75
B15WMIRYCE3W6OP	07/17/26	C. Williamson	07/01/26	REAP 2.0 Services	\$2,027.68
B15WGGKWDR3W6OO	07/17/26	Propulsive Executive Services	07/01/26	REAP 2.0 Services	\$487.50
B15KMKAVWT3WH3V	07/21/26	Sanbell	07/08/26	REAP 2.0 Services	\$4,070.00
B15AYXEDGA3Y1HQ	08/03/26	Propulsive Executive Services	08/01/26	Executive Director Services	\$4,747.50
B15CSTANXD3Y1HO	08/03/26	C. Williamson	08/01/26	REAP 2.0 Services	\$1,497.36
B15OKJUWFT3Y1HP	08/03/26	Propulsive Executive Services	08/01/26	REAP 2.0 Services	\$562.50
B15VPNNQMR3Y1HR	08/03/26	Caroline Carter	08/01/26	Bookkeeper Services	\$131.25
ACH zpq9gvxiy	08/20/26	MNS Engineers	08/08/26	REAP 2.0 Services	\$11,237.64
ACH fee	08/20/26	Bank of America	08/20/26	Bank fee	\$1.00
Check 801	08/20/26	Sanbell	07/01/26	REAP 2.0 Services	\$5,220.18
ACH z183ksdu	08/26/26	Economic Development Collaborative	08/25/26	LATA Grant Services	\$55,838.51
B15ANCZPRA40JWA	08/26/26	Moss Levy & Hartzheim	08/25/26	Auditing Services	\$8,000.00
ACH fee	08/26/26	Bank of America	08/26/26	Bank fee	\$1.00

Register of Debit Card Transactions
Ventura Council of Governments
September 10, 2026

Transactions from July 1 through August 31, 2026

<u>Card #</u>	<u>Date</u>	<u>Paid To</u>	<u>Inv. Date</u>	<u>Description</u>	<u>Amount Paid</u>
4579	08/10/26	Intuit Quickbooks	08/10/26	Annual software fee	\$1,242.00
4579	08/20/26	US Postal Service	08/20/26	Postage	\$35.90

ITEM 8D

MEMORANDUM

TO: Council Members and Alternates

FROM: David Pollock, Executive Director



SUBJECT: Financial Controls Policy

DATE: September 10, 2026

Recommendation:

Adopt Resolution No. 2026-03, which formalizes the VCOG Financial Controls Policy to satisfy the administrative requirements identified by auditors.

Discussion:

The proposed Financial Controls Policy establishes internal controls and financial administration practices for the Ventura Council of Governments (VCOG). The policy recognizes VCOG's responsibility to safeguard public funds, including member dues and state and federal grant funding.

The policy is also intended to address significant deficiencies identified in VCOG's fiscal year 2024–2025 audit concerning segregation of financial duties and year-end accounts payable cutoff procedures.

Summary:

Designed for VCOG's contractor-based operating model, the policy establishes documented approvals, independent oversight, and compensating controls where complete segregation of duties is not practical. Key provisions include:

- Defined responsibilities for the Governing Council, Council Chair and Chair-elect, Executive Director, bookkeeper/accountant, and independent reviewers.
- Monthly budget monitoring and financial reporting to the Council at least quarterly.

- Executive Director spending authority for budgeted expenditures up to \$25,000, with Council authorization required above \$25,000.
- Two authorized signatures or approvals for payments exceeding \$5,000.
- Independent approval by both the Council Chair and Chair-elect for Executive Director invoices.
- Standardized invoice documentation, payment records, and vendor approval procedures.
- Monthly bank reconciliations and independent reviews of reconciliations and paid invoices.
- Quarterly review of financial activity, vendor changes, manual journal entries, and unusual transactions.
- A formal year-end accounts payable cutoff process to ensure expenses are recorded in the correct fiscal year.
- Procedures for reporting suspected fraud, control deficiencies, and policy exceptions.

When procurement policies, grant agreements, or applicable laws impose stricter requirements, those requirements will control.

Fiscal Impact:

Adoption of the policy is not expected to create a significant direct fiscal impact. Implementation will require time from staff, contractors, and Councilmembers to complete and document the required reviews. These procedures are expected to improve audit readiness, reduce financial risk, and strengthen accountability for VCOG funds.

ATTACHMENTS: Resolution 2026-03 and Financial Controls Policy

**VENTURA COUNCIL OF GOVERNMENTS RESOLUTION
NO. 2026-03**

**A RESOLUTION OF THE GOVERNING BODY OF
THE VENTURA COUNCIL OF GOVERNMENTS ADOPTING
THE VCOG FINANCIAL CONTROLS POLICY**

BE IT RESOLVED by the Governing Body of the Ventura Council of Governments
(VCOG) as follows:

SECTION 1: The VCOG Governing Body finds it necessary and appropriate to adopt a
policy governing the approval and payment of financial obligations.

SECTION 2: The Governing Body agrees that the Attached VCOG Financial Controls
Policy shall govern the future approval of invoices and bills, and the timely
disbursement of funds to satisfy approved financial obligations.

PASSED AND ADOPTED this 10th day of September, 2026

David Tennessen, Chair

Attest:

David Pollock, Executive Director

VENTURA COUNCIL OF GOVERNMENTS FINANCIAL CONTROLS POLICY

DRAFT ONLY - NOT ADOPTED

SECTION 1: PURPOSE

- 1.0 This Financial Controls Policy (“Policy”) sets forth the internal controls and financial administration practices for Ventura Council of Governments (“VCOG”). VCOG is entrusted with public funds, including member dues and state/federal grant funds, and must ensure that all financial activity is properly authorized, documented, recorded in the correct fiscal period, and reported. This Policy supports transparency, audit readiness, and compliance with applicable law, grant requirements, and VCOG’s governing documents.
- 1.1 Audit-response purpose. This Policy is also intended to address the significant deficiencies identified in VCOG’s fiscal year 2024–2025 audit, including: (A) segregation of duties over cash receipts, disbursements, vendor setup, reconciliations, and journal entries; and (B) period-end accounts payable cutoff procedures.

SECTION 2: SCOPE AND APPLICABILITY

- 2.0 This Policy applies to the VCOG Governing Council (“Council”), the Executive Director, the Administrative Committee when acting on delegated authority, and all contractors and vendors whose invoices are paid by VCOG.
- 2.1 Contractor-based operations. VCOG’s Executive Director position is a contractor role, and VCOG may use additional contractors to support agency programs. The control procedures in this Policy are designed for a contractor-only operating model and emphasize documentation, independent oversight, and clear approvals.

SECTION 3: GUIDING INTERNAL CONTROL PRINCIPLES

- 3.0 VCOG will administer its finances consistent with the following principles:
 - A. Stewardship and reasonableness. All expenditures must be necessary, reasonable, and aligned with VCOG’s mission and adopted budget.

- B. Authorization and accountability. Expenditures must be authorized at the appropriate level and supported by a clear approval record.
- C. Documentation. Financial records must be sufficient to demonstrate allowability, compliance, receipt/acceptance of goods or services, and proper fiscal-year recording.
- D. Segregation of duties and compensating controls. VCOG will separate authorization, custody of assets, recordkeeping, reconciliation, and review to the extent practicable, given staffing levels. Where complete segregation is not practical, VCOG will use documented compensating controls and independent oversight by the Council or its designee.
- E. Compliance. If another adopted VCOG policy (including the VCOG Procurement Policy) or a specific grant agreement imposes stricter requirements than this Policy, the stricter requirement shall control.

SECTION 4: ROLES AND RESPONSIBILITIES

- 4.0 Governing Council. The Council is responsible for adopting the annual operating budget, establishing financial policies, and overseeing VCOG financial operations through regular reporting and review.
- 4.1 Council Chair and Chair-elect. The Council Chair and Chair-elect serve a control function by approving Executive Director invoices and periodically reviewing financial activity, as described in this Policy.
- 4.2 Executive Director (ED). The Executive Director is responsible for day-to-day financial administration, including budget monitoring, reviewing invoices (other than Executive Director invoices), maintaining financial files, preparing or coordinating payment documentation, supporting the year-end close, and coordinating with VCOG's accountant/bookkeeper and auditors, as applicable.
- 4.3 Bookkeeper/accountant. VCOG's third-party bookkeeper or accountant, if engaged, supports recordkeeping, reconciliations, financial reporting, and year-end close activities. The bookkeeper/accountant may not substitute for the independent oversight reviews required by this Policy unless the review is specifically assigned to the bookkeeper/accountant and the task being reviewed was not performed by that same person.
- 4.4 Independent reviewer. The Council may designate the Chair, Chair-elect, an Administrative Committee member, another Council member, or another qualified

person to perform the independent review functions required by this Policy. The reviewer should not be the person who initiated, processed, paid, recorded, or reconciled the transaction being reviewed.

SECTION 5: BUDGETARY CONTROL AND FINANCIAL REPORTING

- 5.0 Annual budget. VCOG will operate under an annual budget adopted by the Council. No expenditure shall be made unless it is consistent with the adopted budget and any applicable grant restrictions.
- 5.1 Budget monitoring. The Executive Director will monitor revenues and expenditures at least monthly and will notify the Council Chair and Chair-elect of significant variances, anticipated overruns, or cash flow concerns.
- 5.2 Regular reporting. At least quarterly (or more frequently if directed by Council), the Executive Director will provide the Council with financial information sufficient to support oversight, which should include at a minimum:
 - A. Year-to-date revenues and expenditures compared to budget;
 - B. Cash and investment balance summary;
 - C. Material commitments (executed contracts, pending invoices, and expected grant receipts);
 - D. A summary of paid invoices and disbursements for the reporting period; and
 - E. A summary of any manual journal entries posted during the reporting period, if any.

SECTION 6: SPENDING AND APPROVAL THRESHOLDS (SIMPLE TIERS)

- 6.0 Purpose. The following tiers establish minimum approval requirements for obligations and disbursements. Procurement method requirements (quotes, RFP/RFQ, etc.) are governed by the VCOG Procurement Policy and any applicable grant rules.
- 6.1 Up to \$500. The Executive Director may approve and pay for purchases, provided that the documentation requirements in Section 8 are met.

- 6.2 \$501 to \$25,000. The Executive Director may approve and pay for purchases and contracts within this range, provided that the expense is within the adopted budget and complies with the VCOG Procurement Policy and any applicable grant requirements.
- 6.3 \$25,001 and above. Council authorization is required prior to execution of the obligation (contract, purchase order, or equivalent), unless the Council has expressly delegated authority in writing for a specified purpose, project, vendor, or amount.
- 6.4 Splitting prohibited. Purchases and contracts shall not be split or segmented to avoid approval thresholds or procurement requirements.
- 6.5 Two-signature requirement. Payments over \$5,000 require two authorized signatures or documented approval by two authorized approvers before release. This requirement applies regardless of payment method, including checks, ACH, wire transfers, or payment card transactions, unless a stricter requirement applies by law, grant agreement, or Council action.

SECTION 7: INVOICE REVIEW, APPROVAL, AND PAYMENT

- 7.0 Invoice standards. Invoices submitted for payment must include, at a minimum: vendor/contractor name; invoice number and date; service period; description of services/deliverables; amount due; itemized reimbursable expenses (if any); and reference to the underlying contract, task order, or authorization.
- 7.1 Executive Director review. Prior to approving an invoice (other than those submitted by the Executive Director or their Company) for payment, the Executive Director will confirm that:
 - A. The invoice is mathematically correct;
 - B. The charges are allowable under the applicable agreement and any grant requirements;
 - C. The goods/services were received, or the deliverables were accepted (or progress is adequate);
 - D. Required supporting documentation is attached; and
 - E. The vendor is on VCOG's approved vendor listing or the vendor addition/change has been independently reviewed under Section 8.3.

- 7.2 Approval before payment. Whenever practicable, someone other than the person responsible for releasing the disbursement must review and approve invoices before payment is made. When staffing limitations require the same person to perform multiple steps, include the transaction in the monthly independent review described in Section 10.2.
- 7.3 Executive Director invoices. Invoices submitted by the Executive Director or their Company must provide sufficient detail to support allowability (scope, service dates, and description). Executive Director invoices shall be approved for payment only after approval by both the Council Chair and the Chair-elect.
- 7.4 Timeliness. VCOG will pay properly approved invoices in a timely manner, subject to cash availability and any grant reimbursement timing constraints.

SECTION 8: DOCUMENTATION, RECORDKEEPING, AND VENDOR CONTROLS

- 8.0 Payment file. For each disbursement, VCOG will retain (electronically where feasible) documentation sufficient to demonstrate authorization and allowability. At a minimum, the payment file should include:
 - A. The approved invoice;
 - B. The executed contract/MOU/task order or written authorization;
 - C. Evidence of receipt/acceptance (email confirmation, deliverable, memo, or similar);
 - D. Supporting documentation for reimbursable expenses (receipts, mileage logs, etc.);
 - E. Proof of payment (check copy, ACH confirmation, or bank record); and
 - F. For payments over \$5,000, evidence of the second signature or second approval.
- 8.1 Retention. Financial records shall be retained consistent with applicable grant requirements, audit standards, and any VCOG records retention policy adopted by the Council.
- 8.2 Approved vendor listing. VCOG will maintain an approved vendor listing that includes, at a minimum, the vendor name, contact information, payment method,

tax documentation status (if applicable), and the basis for approval (contract, Council authorization, grant agreement, or other written authorization).

- 8.3 Vendor additions and changes. Independently review new vendors and changes to vendor payment information before payment whenever practicable. The independent review may include confirming the change with a known vendor contact, reviewing supporting authorization, or comparing the vendor to the applicable contract or Council approval.
- 8.4 Annual vendor review. The Council, Administrative Committee, Council Chair and Chair-elect, or another designated reviewer will review the approved vendor listing at least annually. The review should identify inactive vendors, duplicate vendors, unusual payment arrangements, and any vendors requiring updated documentation.

SECTION 9: BANKING, CASH, AND DISBURSEMENTS

- 9.0 Payment methods. VCOG may make payments by ACH, check, and, for pre-approved purposes, limited use of payment cards.
- 9.1 Bank accounts and authorized signers. VCOG shall hold bank accounts in the name of the Agency. Authorized signers and any changes to signatory authority shall be approved by Council action or an adopted resolution/policy.
- 9.2 Payment cards. If VCOG uses a credit card or payment card:
 - A. Card use shall be limited to necessary and reasonable VCOG business expenses.
 - B. Receipts are required for all charges.
 - C. The Executive Director will reconcile charges monthly.
 - D. The Council Chair and Chair-elect, or another designated independent reviewer, will review card activity (statement or transaction log) at least quarterly.
- 9.3 Cash handling. VCOG will avoid cash transactions when feasible. Log and deposit any cash received promptly.
- 9.4 Cash receipts. Log cash receipts, checks, and electronic deposits and match them to bank deposits or bank activity. Where practicable, the person recording

receipts should not be the same person performing the bank reconciliation. If that separation is not practicable, include receipts activity in the independent review described in Section 10.

SECTION 10: RECONCILIATIONS, JOURNAL ENTRIES, AND OVERSIGHT REVIEW

- 10.0 Bank reconciliations. Reconcile bank accounts at least monthly. The Executive Director will retain reconciliations and supporting bank records.
- 10.1 Independent reconciliation review. Monthly bank statements and bank reconciliations shall be reviewed by an independent reviewer who did not prepare the reconciliation. The reviewer should document the review by email, signature, checklist, or other written record.
- 10.2 Monthly paid invoice review. At least monthly, the Council Chair, Chair-elect, Administrative Committee, or another designated reviewer shall review a listing of invoices paid during the period. The review should include, on a sample or risk-based basis, cross-referencing payments to supporting invoices, proof of approval, and the approved vendor listing.
- 10.3 Journal-entry review. Manual journal entries posted to VCOG's accounting records shall be reviewed periodically by an independent reviewer and at least quarterly when manual journal entries have been posted. The review should include the QuickBooks or accounting system manual journal-entry report, supporting documentation, and evidence of approval for significant or unusual entries.
- 10.4 Quarterly oversight review. At least quarterly, the Council Chair and Chair-elect, the Administrative Committee, or another designated reviewer will review:
 - A. A summary of disbursements by vendor, amount, and date;
 - B. Bank statement ending balances and reconciliation status;
 - C. A sample of underlying payment files;
 - D. Any vendor additions or vendor payment-information changes;
 - E. Manual journal-entry activity, if any; and
 - F. Any exceptions, unusual transactions, or missing documentation identified during the period.

- 10.5 Documentation of review. Oversight reviews required by this Section shall be documented and retained with VCOG's financial records.

SECTION 11: PERIOD-END ACCOUNTS PAYABLE CUTOFF AND YEAR-END CLOSE

- 11.0 Purpose. VCOG will record liabilities and related expenditures in the fiscal year in which the underlying goods or services were received, consistent with applicable accounting standards and audit requirements.
- 11.1 Year-end cutoff procedure. As part of the annual close, VCOG will perform a formal accounts payable cutoff procedure. The procedure shall include:
- A. Reviewing invoices received after June 30 for a defined period, generally 30 to 60 days;
 - B. Reviewing disbursements made after June 30 for a defined period, generally 30 to 60 days;
 - C. Determining whether the related goods or services were received on or before June 30;
 - D. Accruing all prior-year obligations as accounts payable when required;
 - E. Reconciling accrued liabilities to subsequent payments; and
 - F. Retaining documentation supporting the cutoff analysis and any year-end entries.
- 11.2 Grant-funded and contractor invoices. Particular attention shall be given to grant-funded services, consultant/contractor invoices, reimbursement requests, and other costs that may be billed after year-end but relate to services performed before June 30.
- 11.3 Bookkeeper/accountant coordination. The Executive Director will coordinate with the bookkeeper/accountant to ensure that all identified year-end payables are recorded before the financial statements are finalized or provided to the auditor.
- 11.4 Reviewer sign-off. The year-end cutoff analysis and related accounts payable accruals shall be reviewed by the Council Chair, Chair-elect, Administrative Committee, or another designated reviewer before or during audit preparation.

SECTION 12: FRAUD PREVENTION AND REPORTING

- 12.0 Suspected fraud, theft, misuse of funds, or material Policy violations shall be reported promptly to the Council Chair and Chair-elect. The Council may direct an independent review, audit, or other appropriate action.
- 12.1 Control exceptions. Report missing documentation, unapproved vendor changes, unreconciled accounts, unreviewed journal entries, failure to obtain required approvals, or failure to perform year-end cutoff procedures to the Council Chair and Chair-elect, and correct them promptly.

SECTION 13: EXCEPTIONS

- 13.0 Any exception to this Policy shall be documented in writing (including rationale) and approved by the Council unless the Council has delegated specific exception authority in writing.
- 13.1 Emergency or timing exceptions. If timing or operational urgency requires a payment or action before all review steps are completed, the exception shall be documented, approved by the Council Chair or Chair-elect when practicable, and included in the next independent oversight review.

SECTION 14: POLICY ADMINISTRATION AND UPDATES

- 14.0 The Executive Director is responsible for administering procedures consistent with this Policy. The Council will review this Policy at least every three (3) years, or sooner as needed due to audit findings, grant requirements, or operational changes.