Electronic Funds Transfer ("EFT") Control Procedures Policy

(Approved 11/13/2025)

Per BARS Manual 3.8.11.10, Electronic funds transfer ("EFT") refers to the disbursement from a bank account by means of wire, direct deposit, ACH or other electronic means. In accordance with RCW 39.58.750, the following accounting procedures for such transactions have been prescribed:

1. The procedure to initiate, approve, and record an EFT payment is subject to the same financial policies, procedures, and controls that govern disbursements made by any other means.
    - The transfer will be conducted by the Director and reviewed by her/his designee (who will not be entering or initiating the transfer).
    - The Board of Commissioners will approve reimbursements to MPRD's Revolving account at their regular monthly board meeting. Transactions will be documented
    - Reconciliation of banking activity to the General Ledger will be performed in a timely manner with all exceptions resolved.
2. EFT transactions will not be made without proper authorization of affected parties in accordance with federal and state statutes and accepted business practices.
3. All EFT payments should be initiated by secure computer-based systems and known portals, such as IRS, LNI, and DRS, or through Wells Fargo's secure website.
4. The Director shall serve as primary administrator to manage and control access to the systems used to process EFT transactions. The administrator shall ensure that adequate separation of duties exists in accordance with accepted internal control standards. In addition, the administrator shall ensure approval and maintenance of user system IDs, user permissions, including authorized representatives and their associated transfer limits. Board commissioners have authority serve as back-up administrator.
5. Because EFT transfers between MPRD bank accounts (Holding and Revolving through Wells Fargo) have reduced risk, MPRD may use EFTs on a routine basis to concentrate funds for payments. Qualifying funds must be replenished through the monthly voucher system and documented accordingly in the Holding and Revolving Register. Although the risks are minimal for transfers between MPRD accounts, reasonable controls should exist with regard to authorization, reconciliation, and review of these transactions.
6. EFT payments are limited to transfers between MPRD bank accounts, payment of merchant service providers, and monthly and quarterly taxes.