

CREDIT CARD POLICY AMENDMENT

Finance and Audit Committee

April 10, 2026

ACTION REQUESTED

Recommend this item to the Executive Committee for placement on the June 2026 Board of Directors agenda:

- Approve an amendment to the NOACA Credit Card Policy

PREVIOUS ACTION

The NOACA Credit Card policy was approved by the Board of Directors in March 2019 and revised by the Board in September 2023.

BACKGROUND

The Auditor of State (AOS) issued Bulletin 2025-012, joining the Ohio Ethics Commission's (OEC) Advisory Opinion No. 2025-02, recommending that public offices adopt policies/rules for the personal use of reward program points accrued while conducting public business.



BACKGROUND

OEC Advisory Opinion No. 2025-02

- **Revised restrictions from public officials and employees personally using rewards earned during official business, provided:**
 - 1) Rewards are earned in the same manner as the general public;
 - 2) They do not impose additional costs on the public office; and
 - 3) The airline, hotel, vendor, etc. are not selected just to earn the reward points for themselves
- **Determined personal use of these rewards does not constitute additional compensation**
- **Recommended that public offices adopt a policy regarding personal use of these rewards, which can be more restrictive than Ohio Ethics Law**

AMENDMENTS

Added to Paragraph 14:

Reward points earned on the Agency's credit card account shall be used only upon the express approval of the Executive Director/designee, and only for the benefit of the Agency and not for personal benefit.

AMENDMENTS

New Paragraph 15:

No Agency employee may use the Agency's credit card to earn personal frequent flyer miles, hotel rewards, or other reward points to a personal account unless:

- a. The personal points, miles, or rewards are acquired under the same conditions as a member of the public would earn them;
- b. Acquisition of the personal points, miles, or rewards poses no additional cost to the Agency; and
- c. The availability of the personal points, miles, or rewards has no influence on the purchase or expenditure made on behalf of the Agency, as such considerations are strictly prohibited
- d. Where these criteria are fully satisfied, personal points/miles earned may be used by an Agency employee for personal use

AMENDMENTS

Administrative changes:

- Remove the term “Comptroller”
- Change the term “Accounting” office to “Finance” office
- Increase the total credit limit from \$20,000 to \$30,000

NEXT STEPS

Pending Board approval, staff will implement the amended NOACA Credit Card Policy.

ACTION

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Motion
Second
Discussion
Put the Question





NOACA

Northeast Ohio Areawide Coordinating Agency

NOACA will **strengthen** regional cohesion, **preserve** existing infrastructure, and **build** a sustainable multimodal transportation system to **support** economic development and **enhance** quality of life in Northeast Ohio.