COLUMBIA COUNTY CAPITAL RESOURCE CORPORATION

DATA GATHERING PROCEDURES

I. Scope

This policy applies to all individuals, companies, agencies or others that receive financial assistance from Columbia County Capital Resource Corporation (the "Corporation").

II. Objectives

The primary objectives of the Corporation's data gathering procedures are to:

- Assure compliance with annual reporting requirements of the New York State Comptroller
- Assist in measuring the effectiveness of assistance provided
- Provide information for comparison to other development agencies

III. Description of Information

The Corporation may provide financial assistance in several different forms, including:

- Assistance in the issuance of debt (bonds, notes, etc.)
- Sales tax abatements
- Mortgage tax recording abatements

Information reported on an annual basis includes:

- In cases where the Corporation assisted with the issuance of debt (e.g. IR bonds issued), even though the Corporation has no responsibility for repayment of the debt, nor in the case of default, the Corporation must report any beginning of year debt balances outstanding, any debt issued, principal payments made and end of year debt balances.
- Sales and mortgage tax abatements during the fiscal year.
- In all cases where the Corporation provides financial assistance, the Corporation must report:
 - The number of FTE employees at the project location before Corporation assistance
 - The original estimate of jobs to be created
 - o The original estimate of jobs to be retained
 - The number of current FTE employees
 - o The number of jobs created during the fiscal year
 - The number of FTE jobs created during the fiscal year
 - The number of FTE jobs retained during the fiscal year
 - The number of FTE construction jobs created during the fiscal year

This information can only be obtained through direct confirmation with the benefiting companies.

IV. Procedures to Obtain Information

Requirements to provide for the annual reporting of this information will be included in all agreements between the Corporation and benefiting companies.

In order to assure compliance with reporting requirements the Corporation will perform the following procedures:

Procedure	Date	Responsibility
Confirmations requests will be mailed to all companies who have received Corporation benefits	Dec. 30th	Confirms prepared by independent auditor, signed by Corporate Chairman
If no response is received, second confirmations will be mailed to companies that have not responded	Jan. 15th	Confirms received are tracked by the auditor, signed by Corporate Chairman
If no response is received, third confirmations will be mailed to companies that have not responded	Jan. 30th	Confirms received are tracked by the auditor, signed by Corporate Chairman
If no response is received, the Corporation's consultant/attorney will call the company to solicit a written reply	Feb. 15th	Confirms received are tracked by the auditor, consultant/ attorney will document result of inquiries made

The results of these inquiries will be reported as follows:

- At the Corporation's February Board meeting (held the 1st Tuesday of the month), a listing of all confirmations mailed and replies to date will be presented for Board review.
- At the Corporation's April Board meeting, a listing of confirmations mailed and verbal
 inquiries made, and responses received and data obtained will be presented for Board
 review.

V. Further Actions

If no reply is received, the Board will determine appropriate further actions.