



## Purchasing Card Site Managers - Address Non-Compliance

Procedure # 3013.10; Rev. 0 (Effective May 8, 2017)

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**Related Policy:** [UW-3013 Purchasing Card Policy](#)

**Functional Owner:** Accounting Services, Division of Business Services

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#### I. Procedure statement

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Purchasing card site managers are responsible for reviewing purchasing card activity and identifying non-compliance. Examples of non-compliance include using the purchasing card for personal/non-UW business-related purchases, inappropriately using University funds, serial purchasing, and failure to provide required supporting documentation. When a site manager identifies non-compliant use of a purchasing card, the following procedure should be referenced. Non-compliance must be addressed within the 30-day transaction reconciliation requirement.

#### II. Who is affected by this procedure

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Purchasing cardholders, purchasing card site managers, Divisional Business Office leadership, Purchasing Card Program Administrator.

#### III. Procedure

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- A. **Purchasing Card Site Manager Review and Reconciliation:** Site managers are required to review purchasing card transactions to verify policy compliance. See 3013.5 Purchasing Card Site Manager Review and Reconciliation.
- B. **Non-Compliance Procedure:** For audit purposes, all non-compliance identification, acknowledgement, and follow-up activity must be documented with the non-compliant transaction in the Purchasing Card Module of the Shared Financial System (SFS). If non-compliance is identified, the site manager must complete the following steps:
  - 1. If the compliance issue can be resolved by sending the purchasing card transaction back to the cardholder for further information and verification within the Purchasing Card Module (e.g., expanding on a previously provided business purpose, attaching additional required supporting documentation, documenting an attempt to recover sales tax paid in error), enter a request in the **Comment** field, change the status of the transaction to **Staged**, and click **Save**. Wait for the cardholder to re-verify the transaction, review the supporting

documentation, and approve as appropriate.

Note: This exchange between the site manager and the cardholder may take place outside of SFS (e.g., via email); however, it is recommended communications are attached to the transaction or summarized in the Comment field for audit purposes.

2. If the compliance issue cannot be corrected within the Purchasing Card Module, but follow-up activity is occurring outside of the module (e.g., reimbursing the UW for a personal/non-compliant expense, cardholder acknowledgment of policy requirements for future purchasing activity), complete the [Purchasing Card Non-Compliant Transaction Acknowledgement Form](#) and route to the cardholder for review, acknowledgment, and approval. The signed form must be attached to the transaction in the Purchasing Card Module prior to approval.

#### IV. Contact Roles and Responsibilities

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- **Cardholder:** Responsible for responding to site manager requests to ensure compliance with purchasing card policy and procedure.
- **Site manager:** responsible for identifying non-compliance with purchasing card policy and procedure, notifying the cardholder, and ensuring transactions as reconciled in accordance with policy.

#### V. Definitions

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- **Cardholder:** the individual who holds a purchasing card and is responsible for the card and use of it.
- **Non-compliance:** any action or purchase which conflicts with purchasing card policy or procedure.
- **Site manager:** the individual who manages purchasing cards at the departmental or divisional level.
- **Purchasing Card Non-Compliance Transaction Acknowledgement Form:** A form completed and attached to a purchasing card transaction to acknowledge non-compliance and how it was addressed.

#### VI. Related references

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- [Purchasing Card Policy and Procedures](#)
- [Purchasing Card Non-Compliant Transaction Acknowledgement Form](#)

#### VII. Revisions

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Procedure Number	3013.10
Date Approved	May 8, 2017
Revision Dates	January 19, 2021 - Updated Procedure Number to 3013.10 from 300.10 December 11, 2021 – Purchasing Card Module implementation