Compliance Infraction Guide

In order to ensure compliance with the policies and procedures of the Purchasing Card Program, the following actions are taken by the Purchasing Office when infractions are discovered during audits. Infractions are classified into two categories: Minor Infractions and Critical Infractions. General descriptions and discipline measures are listed below.

Minor Infractions (4 infractions, over multiple cycles)

- Inappropriate use of fund or account
- Inadequate receipts – Not Itemized with description and quantity of what was purchased
- Non-Imaging/ Failure to upload required receipts in WORKS
- Not reconciling in WORKS
- Failure to sign off on transactions in WORKS (reconcilers and approvers) by the listed deadline
- Inappropriate purchase - Refer to PCard Guidelines at the link below for typically non-allowed items [http://www.unew.edu/purchasing/documents/PCardGuidelines.pdf](http://www.unew.edu/purchasing/documents/PCardGuidelines.pdf)
- Inappropriate use of card (required by Check Request or uShop)
- Failure to comply with State Contract (without acceptable explanation)
- Failure to respond to a Compliance Violation Notification within 10 business days, will cause an additional Compliance Violation.

1\textsuperscript{st} offense: Memo letter to the cardholder stating what the minor infraction is and what action is needed to resolve the infraction.

2\textsuperscript{nd} offense: Memo letter to the cardholder and budget authority/approver stating what the minor infraction is and what action is needed to resolve the infraction.

3\textsuperscript{rd} offense: Memo letter with warning to the cardholder, reconciler and budget authority/approver stating what the minor infraction is and what action is needed to resolve the infraction.

4\textsuperscript{th} offense: Card is revoked for six (6) months. After six (6) months a request may be made to reinstate the card, and the cardholder must attend the Purchasing Cardholder Training Class, Pur 202, before the card is reinstated.

Critical Infractions (immediate 4\textsuperscript{th} offense, card revocation)

- Purchasing from a Debarred vendor
- Inappropriate Use of Card - letting someone other than the cardholder use the p-card
- Split Transactions (splitting a transaction to avoid the single transaction limit, or prepared food rule)
- Shipping to an off-campus location

Immediate 4\textsuperscript{th} Offense – Card is revoked for six (6) months. After six (6) months, a request may be made to reinstate the card. If approved, the cardholder must attend the P Cardholder Class (PUR202) before the card will be reinstated.

Critical Infraction (immediate card revocation)

- Intentional personal use

If a personal purchase is made on the purchasing card, a theft of state property has occurred. The card is revoked. Division head and University Police notified, and appropriate disciplinary action will be taken. Cardholder is not eligible for future p-card use.

- Purchasing has the discretion to suspend any card at any time.

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