TO: Chair and Members
Audit, Finance and Administration Committee

WARD(S) AFFECTED: CITY WIDE

COMMITTEE DATE: April 6, 2011

SUBJECT/REPORT NO:
Procurement Card Usage Audit (AUD10022) Update (FCS11030) (City Wide)

SUBMITTED BY:
Antonio D. Tollis
Treasurer
Corporate Services Department

PREPARED BY:
Antonio D Tollis Ext 4549

SIGNATURE:

RECOMMENDATION

That Report FCS110030 outlining actions taken regarding a motion (Item 13), approved by Council at it’s meeting of September 29, 2010 with respect to Report # AUD10022, be received.

EXECUTIVE SUMMARY

At its meeting of September 29, 2010, Council approved Item 13, which directed staff to report back on a number of issues with respect to the Report AUD10022 respecting Procurement Card (P Card) Usage.

Staff were directed to reduce the number of active purchasing cards of approximately 600 to 510 or 15%. To date, the number of cards was reduced by 96 or 16.0%.

Staff were also directed to review the procedures with respect to the administration and payment of P Cards, to ensure enforcement and compliance and, in the event of non-compliance, ensure that there are adequate consequences. In response to this, staff have implemented a revised procedure (Appendix “B” to report FCS11030) for the

Vision: To be the best place in Canada to raise a child, promote innovation, engage citizens and provide diverse economic opportunities.
Values: Honesty, Accountability, Innovation, Leadership, Respect, Excellence, Teamwork
monitoring and payment of P Card expenses effective January 1, 2011, as outlined in the recommendations.

These procedures will ensure that all issues of non-compliance are promptly brought to the attention of the Directors / GMs in order for them to take appropriate action.

Action to be taken for non-compliance is outlined in Purchasing Policy 19 (Appendix “C” to report FCS11030) and basically provides for progressive discipline up to and including termination of employment.

The only outstanding item from this motion is item f) which is a follow-up Audit to be performed later this year.

Alternatives for Consideration – Not Applicable

FINANCIAL / STAFFING / LEGAL IMPLICATIONS (for Recommendation(s) only)

Financial: N/A

Staffing: N/A

Legal: N/A

HISTORICAL BACKGROUND (Chronology of events)

At its meeting of September 29, 2010, Council approved Item 13, as outlined below:

Item 13 Audit Report 2010-05 Procurement Card Usage (AUD10022)

a) That Report AUD10022 respecting Audit Report 2010-05, Procurement Card Usage, be received.

b) That staff be directed to reduce the number of Procurement Cards by a minimum of 15% (90 Cards) by December 31, 2010.

c) That a new policy for Procurement Cards be presented to the Audit and Administration Committee at its first regular meeting of February, 2011.

d) That the new Procurement Card Policy includes penalties for non-compliance.
e) That effective January 1, 2011, staff be directed to implement a revised, documented, administration process for the review and payment of P Card Purchases that addresses issues identified in the P Card Audit (Report #AUD10022).

f) That the Audit Services Division be directed to conduct a P Card Audit in the second half of 2011 and that the Audit Department target transactions from January – June of 2011.

POLICY IMPLICATIONS

The Purchasing Policy has been referred to and the procedures with respect to the administration and payment of P Card invoices, has been updated.

RELEVANT CONSULTATION

All Operating Departments were consulted with respect to this report, including Human Resources, with respect to penalties for non-compliance of the Purchasing Policy.

ANALYSIS / RATIONALE FOR RECOMMENDATION

(Include Performance Measurement/Benchmarking Data, if applicable)

With respect to recommendation c) above, the policy regarding P Cards forms part of the existing City Purchasing Policy. As part of the Purchasing Review completed in 2010, staff are in the process of revising all Purchasing Policies. The P Card Policy is covered in Policy #15 of the City’s Purchasing Policy (Appendix “A” to report FCS11030).

The Purchasing Review Team, which is made up of Directors and Managers representing all Departments, have reviewed the policy and is not recommending any changes other than to include the new Procurement Card Processing Procedure. It was determined that the issues surrounding the P Card audit was largely an enforcement issue as opposed to issues regarding the Policy itself.

With respect to enforcement, (Recommendations d) and e) above), staff have implemented a new procedure for the monitoring and payment of P Card invoices (Appendix “B” to report FCS11030). This procedure will bring all non-compliant transactions to the attention of the Divisional Director and ultimately to the GM of the
Department on a monthly basis. This will ensure that all non-compliance issues are dealt with expeditiously.

The current Purchasing Policy also contains a policy with respect to the penalties associated with not complying with Purchasing Policies and associated procedures. This is outlined in Purchasing Policy #19 (Appendix “C” to report FCS11030) and reads as follows:

“An employee who fails to act in accordance with the provisions of the Purchasing Policy will be subject to appropriate disciplinary action up to and including termination of employment. Council, the public, and the business community must have confidence in the integrity of City employees.”

In consultation with HR, it was determined that the Policy for non-compliance (Policy #19), is worded appropriately. As we are effectively dealing with employee performance, each issue must be dealt with on its own merits, so we cannot be too prescriptive in outlining penalties (as suggested in recommendation d) above). As in other performance related issues, the Directors/GM in consultation with HR, will deal with the issue using the progressive discipline method which can ultimately lead to termination of employment.

The following Table outlines the number of P Cards that were in use at the time of the Audit under the heading “PREVIOUS”. The next column shows the current number of P Cards in use at the time of the writing of this report. The total reduction in P Cards to date is 96 or 16.0%.
## TOTAL PURCHASING CARDS ISSUED

<table>
<thead>
<tr>
<th>DEPARTMENT</th>
<th>PREVIOUS</th>
<th>REVISED</th>
<th>CHANGE</th>
<th>% CHANGE</th>
</tr>
</thead>
<tbody>
<tr>
<td>City Managers Office / Mayor Office</td>
<td>8</td>
<td>8</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Community Services</td>
<td>114</td>
<td>94</td>
<td>20</td>
<td>17.59%</td>
</tr>
<tr>
<td>Corporate Services</td>
<td>9</td>
<td>7</td>
<td>2</td>
<td>22.22%</td>
</tr>
<tr>
<td>Public Health Services</td>
<td>38</td>
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<td>18.42%</td>
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<tr>
<td>HES</td>
<td>57</td>
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<td>13</td>
<td>22.93%</td>
</tr>
<tr>
<td>Planning &amp; Ec Dev</td>
<td>36</td>
<td>32</td>
<td>4</td>
<td>11.11%</td>
</tr>
<tr>
<td>Public Work</td>
<td>222</td>
<td>180</td>
<td>42</td>
<td>18.90%</td>
</tr>
<tr>
<td><strong>TOTAL CITY DEPARTMENTS</strong></td>
<td><strong>484</strong></td>
<td><strong>396</strong></td>
<td><strong>88</strong></td>
<td><strong>18.18%</strong></td>
</tr>
<tr>
<td>HECFI</td>
<td>36</td>
<td>33</td>
<td>3</td>
<td>8.33%</td>
</tr>
<tr>
<td>LIBRARY</td>
<td>12</td>
<td>12</td>
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<td>0</td>
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<td>POLICE</td>
<td>67</td>
<td>62</td>
<td>5</td>
<td>7.46%</td>
</tr>
<tr>
<td><strong>TOTAL BOARDS AND AGENCIES</strong></td>
<td><strong>115</strong></td>
<td><strong>107</strong></td>
<td><strong>8</strong></td>
<td><strong>7.02%</strong></td>
</tr>
<tr>
<td><strong>GRAND TOTAL</strong></td>
<td><strong>599</strong></td>
<td><strong>503</strong></td>
<td><strong>96</strong></td>
<td><strong>16.03%</strong></td>
</tr>
</tbody>
</table>

**ALTERNATIVES FOR CONSIDERATION**

(Include Financial, Staffing, Legal and Policy Implications and pros and cons for each alternative)

N/A

**CORPORATE STRATEGIC PLAN**  (Linkage to Desired End Results)


**Skilled, Innovative & Respectful Organization**

- More innovation, greater teamwork, better client focus

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Vision: To be the best place in Canada to raise a child, promote innovation, engage citizens and provide diverse economic opportunities.

Values: Honesty, Accountability, Innovation, Leadership, Respect, Excellence, Teamwork
**Financial Sustainability**

- Delivery of municipal services and management capital assets/liabilities in a sustainable, innovative and cost effective manner

**Intergovernmental Relationships**

- N/A

**Growing Our Economy**

- A skilled and creative labour pool that supports new employers

**Social Development**

- N/A

**Environmental Stewardship**

- N/A

**Healthy Community**

- N/A

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**APPENDICES / SCHEDULES**

Appendix “A” to Report FCS11030 - Procurement Card Policy (Purchasing Policy #15)
Appendix “B” to Report FCS11030 - Procurement Card Processing Procedure
Appendix “C” to Report FCS11030 - Procurement Policy #19 (Policy for the Employee Compliance with Procurement Policy)
POLICY # 15 – Policy for Procurement Cards

SECTION 4.15

(1) No employee shall use a procurement card to purchase Goods and/or Services unless appointed and authorized by such employee's General Manager and the City Manager to do so, following sound business practices. Any use of a procurement card shall be in accordance with the Purchasing Policy and all other applicable City by-laws and policies.

(2) The procurement card will be issued once the employee has read, signed and submitted the Procurement Card Agreement Form, to the Procurement Card Administrator, which sets out in writing the employee's responsibilities and restrictions regarding the use of the procurement card.

(3) All procurement cards issued will have a predetermined “single transaction limit”, a “monthly credit limit” and “blocked commodities” as determined and authorized by the General Manager of the applicable department and City Manager in consultation with the Director of Financial Services. All procurement cards will be blocked from obtaining cash advances.

(4) The program will be administered and audited by the Director of Financial Services or designate, who will maintain a master file of all procurement cards and card limits.

(5) The procurement card shall not be used:

   (a) when a Contract is in effect for the Good and/or Service (unless pre-authorized in writing by the Manger of Purchasing);

   (b) for personal purchases of any nature;

   (c) for computer hardware/software (unless pre-authorized in writing by the Manger of Purchasing);

   (d) for any long-term lease, license or rental agreement which is deemed material as defined by the City’s Lease Financing Policy; Appendix I to FCS04014 on Corporate Administration Committee Report # 04-005;

   (e) for printing requirements that are required to be handled through the City Print Shop; and

   (f) for any purchase of Goods and/or Services that may be prohibited under any other policy approved by Council.

(6) Vendors will not be rejected as a result of their non-acceptance of procurement cards.
POLICY TITLE: Procurement Card Processing Procedure

The purpose of this policy is to set out guidelines for the usage, reporting and monthly review of Procurement Cards.

The Directors of all divisions are responsible to ensure that all respective staff is using the Procurement Cards in accordance with the Purchasing Policy as described in By-Law 09-230.

The Department Card Coordinator (DCC) is responsible to ensure that all reports identified below are submitted to the directors for review in accordance with the information that is included within this procedure.

REFERENCE

<table>
<thead>
<tr>
<th>By-Law</th>
<th>Purchasing Policy By-Law 09-230</th>
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</thead>
<tbody>
<tr>
<td>Policy</td>
<td>Purchasing Policy # 19</td>
</tr>
<tr>
<td>Procedures</td>
<td>Procedure for Procurement Cards # PR-15</td>
</tr>
<tr>
<td>Forms</td>
<td>Procurement Card Application Form – Appendix “A”</td>
</tr>
<tr>
<td></td>
<td>Procurement Card Agreement Form – Appendix “B”</td>
</tr>
<tr>
<td></td>
<td>Procurement Card Maintenance Form – Appendix “C”</td>
</tr>
</tbody>
</table>

POLICY

1. The procurement card will be issued once the employee has read, signed and submitted the Procurement Card Agreement Form, to the Procurement Card
Administrator, which sets out in writing his or her responsibilities and restrictions regarding the use of the procurement card.

2. All procurement cards issued will have a predetermined “single transaction limit”, a “monthly credit limit” and “blocked commodities” as determined and authorized by the General Manager / Executive Director / City Manager of the applicable department in conjunction with the City Treasurer. All procurement cards will be blocked from obtaining cash advances.

3. The program will be administered and audited by the City Treasurer or designate, who will maintain a master file of all procurement cards and card limits.

4. The procurement card shall not be used:
   a. when a contract or tender is in effect for the product (unless authorized by the Purchasing Section).
   b. for personal purchases of any nature;
   c. for computer hardware/software (unless authorized by Information Systems).
   d. for long-term lease or rental agreements;
   e. for printing requirements that are required to be handled through the City Communications Department.
   f. when the cost of the goods or services would be significantly increased as a result of using the card and an alternative method of payment is available.
   g. for any purchase of goods or services that may be prohibited under any other policy approved by Council.

5. Vendors will not be rejected as a result of their non-acceptance of procurement cards; however, where pricing is identical, the lowest total acquisition cost may be used in determining the successful vendor.

Prohibitions

The following activities are prohibited, unless specifically approved by Council (as described in Schedule “A” to the Purchasing Policy By-law No. 09-230):
a. Any attempt to evade or circumvent the requirements of the Purchasing Policy including, but not limited to, the division of purchases to avoid the requirements of the Purchasing Policy by any method, which includes purchases made using procurement cards.

b. Purchase by the City of any Goods and/or Services for personal use by or on behalf of any member of Council, appointed officers, employees of the City or their immediate families.

This policy is consistent with the section 4.15, Schedule A to the Purchasing Policy By-Law 09-230.

IV PROCEDURES AND RESPONSIBILITIES

Cardholder:

The Cardholder is responsible for:

a. Adhering to all conditions and restrictions imposed on the procurement card by the City and the bank.

b. Reading, signing and submitting the Procurement Card Agreement Form (refer to Appendix “B”).

c. Signing and storing the procurement card in a secure place.

d. Immediately notifying the bank and the Departmental Card Coordinator of any loss or theft of the card.

e. Informing the Departmental Card Coordinator of any changes in business address or area of responsibility, telephone number, extended leave, etc.

f. Returning the card to the Departmental Card Coordinator for cancellation or suspension, when directed to do so.

g. Retaining all procurement card receipts, identifying the purpose of the purchase, for attaching to the monthly statement. The cardholder must request a copy of the sales slip to accompany shipments of telephone orders.

h. The monthly statement shall be reviewed for accuracy of charges, signed and forwarded to the Departmental Card Coordinator within 5
working days for further processing. All receipts and supporting documentation shall be attached including the account distribution to which the transaction will be charged.

i. Where the cardholder has been authorized to incur reasonable expenses associated with the entertainment of business contacts, it shall only be when such entertainment is considered to be necessary for the advancement of the interests of the City. The cardholder shall include supporting documentation clearly identifying the event/meal attended, date, purpose, and when applicable, identification of all individuals whose expenses are being reimbursed. If the event/meal includes only internal City staff, alcohol will not be permitted. If some of the attendees are external (i.e. consultants, representatives from other municipalities or agencies, members of the public) alcohol will be permitted.

j. Resolving disputed charges with the assistance of the Departmental Card Coordinator by contacting the vendor as required.

Procurement Section Responsibilities

The Purchasing Section shall review transaction reports to determine:

a. Where vendor discounts can be negotiated.

b. Where opportunities for corporate contracts exist.

c. That charges are in compliance with the policy & procedure.

d. Where further training or counselling is required.

Procurement Card Administrator Responsibilities

The Procurement Card Administrator is responsible for:

a. Key contact with the US Bank.

b. Processing approved requests for new procurement cards and current card changes such as monthly credit limits, cancellation of cards, etc.
submitted via the Procurement Card Maintenance Form. The Procurement Card Administrator shall maintain the approved and signed copy of the Procurement Card Agreement Form.

c. Maintaining a master file of all procurement cards and card limits.

d. Maintaining a schedule of monthly cut off dates for the Card Coordinators to perform their system changes. Upload the distribution of P Card charges to the GL each month.

e. Notifying the bank of unresolved issues on cardholder’s statements if not solved through vendor contact by cardholder/Departmental Card Coordinator.

f. Provide Management Reports as requested.

Department Card Coordinator:

1. The Department Card Coordinator will forward an email to the cardholders and their managers to advise of the availability of the procurement card transaction statements and the submission due date.

2. Once the information is received the Department Card Coordinator will perform the requirements and procedures as described in the Procurement Card - Department Coordinator Procedures

3. As a part of the procurement card reporting requirements the following reports will be prepared:

   a. Cardholder Activity Summary – to verify cards reported with no activity
   b. Cardholder listing – to ensure that all cardholders are included on the Summary and the limits set are within the specific guidelines
   c. Top Merchant Analysis – to determine if a purchase order should be issued for a particular vendor
   d. Audit Report – to verify non-compliances reported in the summary

The above reports are to be prepared by the Department Card Coordinator and submitted to the director in conjunction with:
e. The Procurement Card Monthly Summary – to verify the cardholders activity and compliance of card usage for a given month
f. The Procurement Card Annual Summary – to verify the cardholder activity and compliance of card usage for the year

The Department Card Coordinator will apply reason codes for various infractions by the cardholder:

Reason Codes:

1 = missing receipts
2 = division of transactions
3 = tendered item
4 = personal use
5 = computer items
6 = printing
7 = late submission
8 = other*

* detailed explanations are to be added to properly explain the reason for the use of the “other” reason code. This reason is determined by the manager/director.

4. Once all reports are completed monthly, the reports and monthly transactions are reviewed and signed by the BA and then submitted to the Director for review and signature. Once the Director has reviewed the Director will advise of any action to be taken and the BA will proceed with the action accordingly.

5. The information will form part of the annual submission to the General Manager.

General Managers & Directors:

The General Manager/Executive Director/City Manager/ or Designate is responsible for:
CITY OF HAMILTON

Corporate Services - Treasury Services

STANDARD POLICY & PROCEDURE

a. Applying purchasing policy # 19, which is outlined below, when non-compliant issues regarding Purchasing Cards are brought to their attention:

Section 4.19 - An Employee who fails to act in accordance with the provisions of the Procurement Policy will be subject to appropriate disciplinary action up to and including termination of employment. Council, the public, and the business community must have confidence in the integrity of the City employee.

b. Assessing the need for procurement cards based on operational requirements.

c. Identifying the employee(s) who will be authorized to make purchases through the use of a procurement card.

d. Establishing the credit limit, transaction limit and monthly limit for each cardholder and blocking restrictions if applicable.

e. Ensuring that each cardholder is informed of his or her responsibilities regarding the use of the procurement card.

f. Ensuring that the use of procurement cards conform to corporate policy and procedure.

g. Monitoring and controlling the utilization of procurement cards within their department or area or responsibility.

h. Approving all card changes on the Procurement Card Maintenance Form (see Appendix “C”).

i. Reviewing and approving, on a monthly basis, the statements for all purchases charged to their budgets, using the procedure as described below:
Procedure: Reviewing the monthly Transactions of Cardholders:

The BA will submit to the Director the following forms to be reviewed as described for each report below:

1. Procurement Card Monthly Summary

The Director will review for non-compliance and late submissions separately. The report will identify active cards, non-compliance, late submissions and the reasons for each item.
The Director will review the report on a monthly basis which will include the full package of all transactions for the corresponding division.

The Director will provide the required course of action when non-compliance issues arise. Once the director had provided the course of action, the Department Card Coordinator will act accordingly. (Ex: If a director determines that the course of action will be to suspend a card. The Department Card Coordinator will ensure that the card has been suspended. The appropriate form will be completed and submitted to the director for signature prior to processing. Once the suspension ends the appropriate maintenance form will be completed to ensure the card is reinstated.)

Any non-compliance or late submissions will be added to the annual summary.

2. Procurement Card Annual Summary
The annual summary is provided to the director in conjunction with the monthly summary to ensure that the director is able to view the cardholder patterns from month to month.

The annual summary will also be signed on a monthly basis to indicate review by the director. The review of the annual summary will allow the Director to determine the cards that should be terminated on an annual basis. The Director will relay that information to the BA and the BA will ensure that the cards are cancelled in accordance with the Director’s requests.

Upon review the director will sign the bottom of the monthly and annual summary reports (indicating review) and return the package to the BA for filing.

3. Once the summaries are signed the details will form part of the annual submission to the GM.
**PROCUREMENT CARD APPLICATION - APPENDIX “A”**

**AGENT 1611**

**EMPLOYEE INFORMATION**

<table>
<thead>
<tr>
<th>Employee No.</th>
</tr>
</thead>
</table>

**Cardholder Information for Embossing:**

<table>
<thead>
<tr>
<th>FIRST NAME</th>
<th>INITIAL</th>
<th>LAST NAME</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>DEPARTMENT</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>MAILING ADDRESS OF LOCATION (please include postal code)</th>
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</thead>
</table>

<table>
<thead>
<tr>
<th>BUSINESS PHONE</th>
<th>FAX</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>MOTHER’S MAIDEN NAME</th>
<th>BIRTHDATE OF APPLICANT</th>
</tr>
</thead>
</table>

The information provided on this application is for the sole use of the Royal Bank for Visa security access. This information is private and confidential and is not being released to other parties without prior written authorization of the applicant.

**CARD CONTROLS**

(Approving Director to assign appropriate limits)

<table>
<thead>
<tr>
<th>TRANSACTION LIMIT</th>
<th>MONTHLY CREDIT LIMIT</th>
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<table>
<thead>
<tr>
<th>DEFAULT ACCOUNT NUMBER</th>
<th>DEFAULT DEPTID</th>
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<table>
<thead>
<tr>
<th>BLOCKING BY MCC CODES (Standard blocking rules for Corporation will apply)</th>
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<table>
<thead>
<tr>
<th>INCLUDE</th>
<th>EXCLUDE</th>
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**AUTHORIZATION**

<table>
<thead>
<tr>
<th>EMPLOYEE SIGNATURE</th>
<th>DATE</th>
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</table>

<table>
<thead>
<tr>
<th>GENERAL MANAGER APPROVAL</th>
<th>DATE</th>
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**PURCHASING CARD COORDINATOR**

<table>
<thead>
<tr>
<th>NAME</th>
<th>SIGNATURE</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>DATE</th>
<th>PHONE</th>
</tr>
</thead>
</table>
This document outlines the responsibilities I have as a holder of the City of Hamilton Procurement Card. My signature indicates that I have read and understand these responsibilities, and agree to adhere to the policies and procedures established for the program.

Name

______________________________________________

Card No.

______________________________________________

Expiry Date

______________________________________________

1. Unauthorized use of the card can be considered misappropriation of funds. This could result in:
   a) immediate and irrevocable forfeiture of the card and/or
   b) disciplinary action which could result in termination of employment.

2. I will maintain the card with appropriate security. If the card is lost or stolen, I agree to notify the bank at 1-800-588-8067 and the card administrator immediately.

3. The Procurement Card is issued in my name. I will not allow any other person to use my card. I am considered responsible for any and all charges against this card.

4. I understand that since the company is responsible for payment, I may be periodically required to comply with internal control procedures designed to protect the organization’s assets. This may include being asked to produce the credit card records for audit purposes.

5. I understand that I will receive a monthly electronic statement that will report all activity during the last cycle. I will attempt, with assistance as required from the departmental card coordinator, to resolve any discrepancies by contacting the vendor. I understand that I am required to obtain the cash register receipt slips and reconcile them with the monthly statement.

6. I agree to surrender the card immediately upon termination of employment or when requested to do so by the General Manager/Executive Director or designate or the purchasing card administrator.

7. As the card is corporate property, I understand that I will be required to comply with internal purchasing procedures using current contracted vendors.

8. Cash advances are prohibited.

Employee Signature

______________________________________________

Date

______________________________________________

Employee Number

______________________________________________

S:\Hamilton\Finance\fin\Purchasing\Royal Bank Visa Program - January 2002
<table>
<thead>
<tr>
<th>Card No.</th>
<th>First Name</th>
<th>Initial</th>
<th>Last Name</th>
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**Changes to Employee Information**

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<th>Fax</th>
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**Changes to Card Controls**

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<thead>
<tr>
<th>Purchasing Card to Be</th>
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<table>
<thead>
<tr>
<th>Default Accounting Code *</th>
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<table>
<thead>
<tr>
<th>Blocking by MCC Codes</th>
<th>Include</th>
<th>Exclude</th>
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<tr>
<td></td>
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<table>
<thead>
<tr>
<th>Reason for Change</th>
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<tr>
<td></td>
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**Authorization**

<table>
<thead>
<tr>
<th>Employee Signature</th>
<th>Date</th>
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<table>
<thead>
<tr>
<th>General Manager Approval *</th>
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**Purchasing Card Coordinator**

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* Account Code changes do not require GM approval if change is within the same department/division. F&A staff approval is adequate.
POLICY # 19 – Policy for Employee Compliance with Purchasing Policy

SECTION 4.19

(1) An employee who fails to act in accordance with the provisions of the Purchasing Policy will be subject to appropriate disciplinary action up to and including termination of employment. Council, the public, and the business community must have confidence in the integrity of City employees.