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"CITY P-CARDS"

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Introduction

The purpose of this report is to provide City departments and offices a means to assess controls and processes in place for the administration and operation of their City Purchase Card activities.

Background

The objective of the City's Purchase Card (P-Card) program is to reduce the cost of procuring supplies and services with a cost of less than \$10,000 through administrative efficiencies.

Since the inception of the City P-Card program in 1998, the dollar volume of activity has more than quadrupled. In fiscal year 2002 there were 46,670 purchases totaling approximately \$15 million. As of December 4, 2002, there were 777 active cardholders within the City. These cardholders are spread throughout the City's departments and offices. Each department and office is responsible for administration and operation of P-Card activities within their areas. The Department of Management and Administration (DMA) oversees the program.

There are inherent risks within P-Card programs that should be addressed through implementation of proper controls. For example, "access" controls are needed to

prevent unauthorized individuals from obtaining and using account information (i.e., card numbers and expiration dates) to make inappropriate purchases. "Detection" controls are needed to identify (detect) inappropriate purchases. In addition, "corrective" controls are needed to address issues as they arise. Other controls are necessary for a successful P-Card program.

The necessary controls can be categorized into eight basic categories established in the City's "Internal Control Guidelines," Administrative Policy and Procedure No. 630. These eight categories are:

- Access to and Accountability for Resources
- Direct Activity Management
- Segregation of Duties
- Physical Controls
- Execution of Transactions and Events
- Recording of Transactions and Events
- Information Processing
- Documentation

Table 1 on the following page describes the specific controls for a P-Card program within each of the eight basic categories.

	TABLE 1 – P-CARD CONTROLS				
NO.	CONTROL ACTIVITY CATEGORY	DESCRIPTION			
1.	Access to and Accountability for Resources	Access to P-Card account numbers and expiration dates should be limited to authorized staff. For example, (1) software accessing P-Card activity/records should only be placed on computers of authorized administrative staff, (2) confidential and unique passwords should be required to access activity on such software, and (3) cardholders should be responsible for securing their P-Cards.			
2.	Direct Activity Management	Management should play an active role in (1) determining which employees are provided P-Cards, (2) establishing transaction and spending limits for cardholders based on their anticipated purchasing needs as determined by their job assignments, and (3) reviewing P-Card activity for volume and reasonableness. Management should also ensure that procedures are performed to compensate for certain inherent risks.			
3.	Segregation of Duties	Each P-Card transaction should be reviewed by an employee other than the employee making the purchase. Employees performing the review function should be in a supervisory position.			
4.	Physical Controls	Cardholder account numbers and expiration dates are sensitive information that should be physically secured. Examples include (1) controlling and/or monitoring entry to locations where that information is maintained, (2) assigning custody of sensitive information to designated employees, and (3) locking filing cabinets containing such information when custodial staff are temporarily away from their workstations.			
5.	Execution of Transactions and Events	P-Card transactions should be authorized and executed only by cardholders acting within the scope of their authority. Controlling rules, regulations, and guidelines should be followed. Processing of transactions should be timely and efficient. Controls to ensure proper execution include, for example, (1) review of transactions, (2) cardholder training, (3) prohibitions against sharing of P-cards, (4) trained back ups to staff responsible for processing transactions, (5) issuing P-Cards only to full-time employees with purchasing needs, and (6) requiring proper support for all purchases.			
6.	Recording of Transactions and Events	Documentation should be prepared and events recorded to provide accountability. For example, (1) transactions in InfoSpan should be properly and timely coded, (2) the public purpose of each purchase should be documented, (3) vendor invoices should be defaced to preclude inappropriate duplicate payments, and (4) receipt of purchased items should be documented.			
7.	Information Processing	Information processing includes a variety of controls to check accuracy, completeness, and propriety of activity. Examples include (1) cardholders' reviews of their monthly bank statements and (2) reconciliation of transactions recorded in InfoSpan and shown on monthly statements to support.			
8.	Documentation	Adequate documentation should be prepared and retained. For example, (1) transaction support should be retained in accordance with City record retention requirements, (2) records should be retained for all requested P-Card actions, and (3) written procedures and guidelines should be prepared and issued to cardholders and applicable administrative staff.			

To assist City managers in the proper administration of their P-Card activities, we developed a checklist that addresses control activities and processes that are essential for a successful P-Card program. In preparing this checklist we considered (1) issues and risks identified in our recently completed City P-Card audit (Report No. 0326), (2) issues and risks identified in our review of audits of other governmental entities, and (3) general guidance on P-Card controls available from authorities

such as the United States General Accounting Office (GAO).

Completion of the following checklist should assist managers in determining strengths in their P-Card activities and, more importantly, areas where improvements are needed. Completion and periodic review of the checklist should also make managers more aware of issues and activities to which attention and resources should be directed.

	TABLE 2 – P-CARD CONTROL CHECKLIST				
	CATEGORY 1 – Access to and Accountability for Resources				
		YES	NO	NA	
1.	The City's P-Card system software (InfoSpan) is placed only on the computers of administrative and managerial staff authorized to code transactions and review P-Card activity.				
2.	Passwords used by authorized administrative and managerial staff to access InfoSpan are unique to each applicable employee (i.e., no common passwords) and are maintained by those employees in a confidential manner.				
3.	Individuals granted access to InfoSpan periodically change their passwords.				
4.	Access to InfoSpan is timely eliminated for those individuals (1) terminating employment with the City or (2) transferring to another department/office or to another position for which access capability is not needed.				
5.	Administrative and managerial staff granted access to InfoSpan is limited to accessing only P-Card activity relating to their area (e.g., department, office, division) of responsibility.				
6.	Staff granted access to InfoSpan for monitoring and review purposes only are not also assigned update capability (i.e., to code transactions).				
7.	Access to sensitive P-Card documentation (e.g., records such as monthly statements or vendor receipts that contain cardholder names, account numbers, and/or expiration dates) is limited to authorized staff such as P-Card administrators/coders.				
8.	Cardholders that retain P-Cards on their person are instructed to secure those cards in a manner that reduces the risk of theft, loss, or unauthorized access to the information on those cards.				

CATEGORY 2 – Direct Activity Management				
		YES	NO	NA
1.	Management determines the employees that should be provided P-Cards.			
2.	Management sets cardholder transaction limits based on the cardholders' anticipated purchasing needs as determined by their job assignments.			
3.	Management sets cardholder spending limits based on the cardholders' anticipated purchasing needs as determined by their job assignments.			
4.	Management approves changes to cardholder transaction and spending limits.			
5.	Management regularly (monthly) obtains for review reports of P-Card activity available from the InfoSpan system (e.g., Cost Allocation Report that reflects each transaction).			
6.	The reports of P-Card activity made available for management review are generated directly from the InfoSpan system (i.e., data cannot be deleted from nor manipulated in InfoSpan, whereas data exported from InfoSpan to Excel can be manipulated).			
7.	Management reviews the available InfoSpan reports to ascertain the volume and reasonableness of P-Card transactions. This includes, but is not limited to, determining that: (1) items purchased appear reasonable, (2) payment amounts appear reasonable, and (3) vendors appear appropriate.			
8.	For each cardholder that the InfoSpan report (i.e., Cost Allocation Report) shows activity, management verifies that there is a monthly statement on file that has been signed by the cardholder and the cardholder's supervisor. (This compensates for inherent risks attributable to the capabilities of P-Card coders.)			
9.	Management signs or initials and dates the InfoSpan reports as evidence of their review.			
10.	Management monitors the submission of cardholder documentation (for supervisory approval and coding of InfoSpan transactions) for timeliness.			
11.	Management periodically (e.g., annually) reviews P-Card activity by cardholder to determine cardholders with little or no activity. Management makes an assessment as to whether those cardholders still need a City P-Card.			
12.	Management takes timely actions (i.e., within three months) to address deficiencies and issues identified and reported by DMA as part of routine on-site P-Card reviews.			

CATEGORY 3 – Segregation of Duties				
		YES	NO	NA
1.	P-Card transactions of each cardholder are reviewed and approved by another employee.			
2.	Employees performing the independent review and approval of cardholders' transactions are in a supervisory position.			
	CATEGORY 4 – Physical Controls			
		YES	NO	NA
1.	Entry to storage areas for P-Card records and information is controlled and monitored.			
2.	Custodial responsibility for P-Card records and information is assigned to designated staff (e.g., P-Card coder).			
3.	P-Card records and information that contains sensitive information (cardholder names, account numbers, and expiration dates) is stored in secured locations such as locked file cabinets, desks, or safes.			
4.	Cardholders and their approving supervisors are provided a secured place to submit/return to P-Card administrators/coders those records (vendor receipts and invoices, signed monthly statements, etc.) pertaining to their P-Card purchases.			
5.	Records containing sensitive P-Card information are secured when designated staff (P-Card administrators/coders or approving supervisory staff) is temporarily away from assigned workstations.			
6.	Sealed envelopes from the bank that contain monthly cardholder statements are opened only by the designated P-Card administrator/coder or by the applicable cardholders.			
7.	P-Cards no longer needed (e.g., cardholder terminates employment or is reassigned) are timely destroyed by designated staff.			
8.	P-Cards not provided to cardholders for their retention are maintained in a secured location (e.g., locked file cabinet, desk, or safe).			
9.	P-Card account numbers and expiration dates are redacted when contained on copies of records provided in response to public records requests.			

CATEGORY 5 – Execution of Transactions and Events				
		YES	NO	NA
1.	P-Cards are used only to make authorized purchases on behalf of the City.			
2.	P-Cards are <u>not</u> used to make personal purchases.			
3.	P-Cards are <u>not</u> used to pay for meals during authorized travel or gas associated with out-of-town travel in a personal vehicle.			
4.	Purchases of food are in accordance with the City Manager's Food Guidelines.			
5.	Purchases are made only from appropriate vendors (e.g., no taverns, lounges, or package stores).			
6.	Prior approval is obtained for purchases meeting the department's/office's pre-authorization requirements.			
7.	Competitive procurement practices as prescribed by controlling laws, regulations, and policies are followed when applicable to the purchase.			
8.	Purchases are <u>not</u> split to circumvent competitive procurement requirements.			
9.	Purchases are made within cardholder transaction and spending limits.			
10.	Purchases are <u>not</u> split to circumvent transaction limits.			
11.	Purchases through the Internet are made only with vendors that provide secure sites.			
12.	P-Card account numbers and expiration dates are <u>not</u> e-mailed to vendors or other individuals/entities.			
13.	Vendors are timely paid for items purchased.			
14.	State of Florida sales taxes are <u>not</u> paid.			
15.	When State of Florida sales taxes are paid, reasonable efforts are made to recover the taxes.			
16.	Unsuccessful efforts to recover paid sales taxes are documented.			
17.	Unless justified (e.g., emergency or special circumstances), P-Cards and cardholder account numbers and expiration dates are <u>not</u> shared among employees to make purchases.			
18.	Explanatory reasons are documented in those instances that a cardholder provides his/her P-Card or account information to another employee to make a purchase (i.e., P-Card sharing occurs).			

19.	P-Cards are issued only to City employees.		
20.	P-Cards are issued only to those employees with purchasing needs relating to their job responsibilities and assignments.		
21.	Cardholders receive training prior to receipt of their City P-Cards.		
22.	Appropriate disciplinary actions are taken against cardholder employees that violate City and department/office P-Card policy and procedures (e.g., use a P-Card to make a personal purchase).		
23.	P-Cards of terminating employees are timely cancelled.		
24.	P-Cards are timely cancelled for cardholders that no longer need a P-Card due to (1) transfer to another department or position or (2) changes in their anticipated purchase activity.		
25.	The administering bank (Bank of America) and the City contract administrator in DMA are timely notified in the event of lost or stolen P-Cards.		
26.	Proper and adequate support is obtained for each P-Card purchase, including vendor invoices, receipts, references to applicable contracts and price agreements, competitive quotes, supervisor approvals, etc.		
27.	Support for P-Card purchases (vendor invoices, receipts, quotes, contract references, supervisory approvals, etc.) is timely submitted to P-Card coders/administrative staff to in turn allow timely coding of transactions in InfoSpan (i.e., before monthly "system lockdown").		
28.	Independent reviews of cardholder transactions by the approving supervisors are adequate to determine the validity, propriety, and reasonableness of the purchases.		
29.	The number of cardholders for which each supervisor approves purchases is reasonable given the number and complexity of the purchases made by those cardholders (e.g., a supervisor can reasonably be expected to review and approve the cardholders' transactions given their other supervisory and work responsibilities).		
30.	A back up to the regular P-Card coder is designated and trained to ensure continuity of transaction processing and coding in the event of unforeseen circumstances or during extended work absences of the regular coder.		
31.	The number of back up coders is reasonable given the levels of P-Card activity (not too many and not too few).		
32.	Disputed charges reflected in InfoSpan or on cardholder monthly statements are properly and timely researched and resolved.		
33.	Credits are obtained for disputed charges resolved in the City's favor.		
34.	Fixed asset receipt reports are timely and properly completed and submitted to Accounting Services for the purchase of tangible personal property.		

CATEGORY 6 – Recording of Transactions and Events				
		YES	NO	NA
1.	P-Card transactions are timely and properly coded in InfoSpan.			
2.	Purchases of tangible personal property are correctly coded as capital outlay acquisitions in InfoSpan.			
3.	Records document the specific goods and services purchased.			
4.	Records document the amounts charged (e.g., specific prices charged for each item/service purchased).			
5.	The City business and public purpose served is clearly documented or otherwise readily determinable based on the nature of the purchase.			
6.	Records clearly demonstrate the employee making each P-Card purchase.			
7.	The independent review and approval of P-Card transactions by designated supervisory staff is clearly documented, including documentation of the reviewing/approving individual and date of review/approval.			
8.	Supervisory approvals of P-Card transactions are completed in a manner to preclude the fraudulent addition of P-Card transactions to records subsequent to that approval (e.g., transactions cannot be added to a log containing multiple transactions that has been approved by management).			
9.	Vendor invoices are defaced or marked in a manner to clearly demonstrate that payment was by City P-Card.			
10.	The receipt of purchased goods and services is clearly documented, including the person receiving the items and the date of receipt.			
11.	For purchases exceeding established thresholds, documentation reflects and supports how vendors are selected (e.g., competitive bids, single source vendor, emergency purchase, existing City contract or price agreement, etc.)			

12.	Prior approval is documented for purchases requiring pre-authorization.		
13.	Records demonstrate that payments pursuant to existing contracts or price agreements are in accordance with the terms and conditions of those contracts/agreements.		
14.	Documentation justifies that food purchases are in accordance with the City Manager's Food Guidelines.		
15.	Attendees as well as a description of items and quantities purchased are clearly documented for food purchases made in accordance with the City Manager's Food Guidelines.		
16.	Requests of the City P-Card contract administrator in DMA for P-Card actions (e.g., cancel cards, issue cards, change transaction/spending limits) are made through and documented by e-mail.		

CATEGORY 7 – Information Processing				
		YES	NO	NA
1.	P-Card administrative staff reconcile charges in InfoSpan to support such as vendor invoices, receipts, etc.			
2.	P-Card administrative staff reconcile charges reflected on cardholder monthly statements to charges reflected in InfoSpan and/or to support such as vendor invoices, receipts, etc.			
3.	For P-Card coders/administrative staff that are also cardholders, supervisors reconcile charges reflected on their monthly statements to support such as vendor invoices, receipts, etc.			
4.	Cardholders receive, review, and sign/date their monthly cardholder statements as an assertion of the validity and propriety of the charged transactions.			
5.	Supervisors designated to approve cardholder transactions receive, review, and sign/date the monthly statements of their designated cardholders.			
6.	P-Card administrative staff tracks the receipt, distribution, and return of cardholder monthly statements to ensure that the statements are timely reviewed and signed by applicable cardholders and supervisory staff.			
7.	Monthly purchase activity recorded in InfoSpan for the department/office is reconciled to the summary amounts (charges) entered into the City's financial accounting system (PeopleSoft Financials) through the monthly systems interface.			
8.	Edit reports sent by the City P-Card contract administrator indicating coding discrepancies are timely worked.			
9.	Standard exception reports available from InfoSpan that show (1) potential splitting of purchases to circumvent transaction limits or competitive procurement requirements and (2) instances where cardholders exceed their transaction or spending limits are periodically generated and timely worked.			
10	Appropriate actions are taken based on exceptions and issues identified from review of standard exception and edit reports.			
11.	Given the delays in updates to a department's budget for P-Card purchases, activity is monitored to ensure that purchases are made in accordance with and within the limits of approved budgetary authority.			

CATEGORY 8 – Documentation				
		YES	NO	NA
1.	Support (vendor invoices, receipts, cardholder monthly statements, reviewed InfoSpan reports, etc.) for P-Card purchases is retained in accordance with City record retention requirements.			
2.	Documentation (e-mails) of requests to the City P-Card contract administrator for new P-Cards and changes to the status of existing cards is retained.			
3.	Written procedures are established for the internal operation and administration of P-Card activities within the department/office.			
4.	Written procedures for the internal operation and administration of P-Card activities are consistent with and not contradictory to City P-Card Policy No. 603.			
5.	Written procedures for the internal operation and administration of P-Card activities are comprehensive and address the essential aspects of administering/operating the P-Card program within the department/office. The essential aspects include, but are not limited to: (1) pre-authorization requirements, (2) transaction approving and coding requirements, (3) documentation submission standards, (4) dispute resolution processes, and (5) general oversight measures.			
6.	Written procedures for the internal operation and administration of P-Card activities are distributed to cardholders and P-Card administrative staff.			

Recommendation

We recommend this checklist to each City department and office as a means to identify areas where controls and processes should be implemented and/or improved. Based upon checklist results, available resources and efforts can then be directed to make the needed improvements.

This checklist can also be used by department/office management as a tool for the periodic review and evaluation of P-Card activities. Such periodic reviews are especially important during and after changes in processes and employee assignments/duties.

Copies of this Assistance and Guidance Report #0327 (Project #0305) may be obtained from the City Auditor's web site (http://talgov.com/citytlh/auditing/index.html), or via request by telephone (850 / 891-8397), by FAX (850 / 891-0912), by mail or in person (City Auditor, 300 S. Adams Street, Mail Box A-22, Tallahassee, FL 32301-1731), or by e-mail (dooleym@talgov.com).

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