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# **Manatee County Purchasing Card Program Procedures Manual**

Written Standards and Procedures Approved by the County  
Administrator Pursuant to §2-26-43 of the Manatee County  
Code of Laws

# Table of Contents

<b>SECTION 1. INTRODUCTION .....</b>	<b>3</b>
1.1 Definitions.....	3
1.2 Purpose.....	3
1.3 PCard Description .....	4
1.4 Procedures .....	4
1.5 PCard Program Overview .....	5
1.6 How the PCard Program Works.....	6
1.7 Program Participants and Responsibilities .....	6
1.7.1 Card Issuer.....	6
1.7.2 Purchasing Official.....	6
1.7.3 PCard Administrator.....	7
1.7.4 Department Director.....	7
1.7.5 Department Proxy Reconciler .....	8
1.7.6 Cardholder.....	8
1.7.7 Approver.....	9
1.7.8 Finance Department: .....	10
<b>SECTION 2. ASSIGNMENT AND CONTROL OF THE PCARD .....</b>	<b>10</b>
2.1 Who is Eligible for a PCard .....	10
2.2 How to Obtain a PCard.....	10
2.3 Issuance of PCard.....	11
2.4 Card/Account Number Security .....	11
2.5 Spend Limits .....	12
2.6 Merchant Category Code Groups.....	13
2.7 Training.....	13
2.8 Changes, Termination, Resignation, or Transfer of Employee .....	13
2.9 Cardholders on Leave of Absence.....	14
2.10 EOC Activation (Emergency) Procedure .....	14
2.11 Financial Disclosure.....	15
2.12 Separation of Duties .....	15
<b>SECTION 3. CARDHOLDER USE OF THE PCARD .....</b>	<b>15</b>
3.1 Making a Purchase .....	15
3.2 What Can and Cannot be Purchased with the County PCard.....	16
3.3 Non-Allowable Purchases.....	16
3.4 Billing Cycle .....	17
3.5 Statements .....	18
3.6 Weekly Submission.....	18
3.7 Quotes and Documentation .....	18
3.8 Receipts and Invoices.....	19

3.9	Missing Documentation .....	19
3.10	Commodities and Travel Expenses .....	19
3.11	Services .....	21
3.12	Insurance .....	21
3.13	Approving Transactions in WORKS .....	21
3.14	Record Keeping.....	22
3.15	Surcharge and Convenience Fees.....	22
3.16	International Transaction Fees .....	23
3.17	Sales Tax Charged by a Supplier.....	23
3.18	Resolving Errors and Disputes .....	23
3.19	Lost, Stolen or Misplaced PCards .....	24
3.20	Fraudulent Charges.....	24
3.21	Disputed Charges .....	25
<b>SECTION 4. PROGRAM REVIEW AND COMPLIANCE .....</b>		<b>25</b>
4.1	Program Review.....	25
4.2	Compliance.....	26
4.3	PCard Violations .....	27
4.4	Violations and Consequences.....	28
4.5	Procedure for Handling Violations.....	30

## SECTION 1. INTRODUCTION

### 1.1 Definitions

- a. Approver – employee’s direct report who has appropriate delegated purchasing and financial spend authority to conduct final review of transactions for compliance, and approves the transaction;
- b. Cardholder – full-time permanent employee designated by their Department Director to be issued a purchasing card in their name for use under these procedures;
- c. Credit Card Issuer (Bank) - the financial institution that provides purchasing card services to the County;
- d. County – Manatee County Government;
- e. Department Director – head of a department reporting directly to the County Administrator or Deputy County Administrator;
- f. Purchase - goods or services with a total procurement value up to \$5,000.00;
- g. Fraud – the unauthorized use of the purchasing card;
- h. Itemized Receipt – a detailed receipt by the supplier detailing individual products and services purchased by product description, unit price, subtotal, taxes, and extended total;
- i. Non-Compliance – failure to act in accordance with this Purchasing Card Program procedures;
- j. Purchasing Card (PCard) – a payment tool that functions similar to a credit card and for which a specific County employee is assigned use and responsibility;
- k. Purchasing Card Administrator (PCard Administrator) – employee, as designated by the Purchasing Official, who shall serve as the main point of contact for all card program personnel and as liaison between County and the Credit Card Issuer for general oversight of the PCard Program;
- l. Proxy Reconciler - employee that has been designated, to perform reconciliations on behalf of a Cardholder;
- m. Public purpose – means any purchase that benefits the public or section of the public;
- n. Reconciliation – the process of matching itemized receipts and documentation to a transaction ensuring all charges, taxes, and account allocation are documented and correct;
- o. Split Transactions – transactions that are processed in a manner to circumvent the single transaction limit, for example, several purchases being made over a short period of time for the same goods or services;
- p. Transaction – a purchase by a Cardholder for goods or services from a supplier.

### 1.2 Purpose

The purpose of this manual is to establish the procedures for the Manatee County PCard Program. These procedures follow current Manatee County Procurement Administrative Standards and Procedures and Manatee County Per Diem and Travel Reimbursement Procedure.

### 1.3 PCard Description

The Manatee County PCard is a card that may be used by County employees for authorized purchases within the delegated authority limit. The PCard is issued in the names of authorized, trained individuals to purchase certain eligible goods and services in support of Manatee County. Only eligible direct County business expenses may be charged to the PCard; personal purchases are strictly prohibited. All PCard transactions must be supported by a detailed business purpose and by proof of purchase documentation. Improper use of the PCard, including use of the PCard for personal purchases, may result in disciplinary action up to and including termination of employment.

The PCard is a Visa credit card issued by Bank of America for Manatee County Government. The PCard is the property of Manatee County and is only to be used for official County business purposes. Although the card is issued in an individual's name, its use does not affect personal credit in any way. The PCard is an efficient and effective way for departments to purchase goods and services for the County. One should be aware that abuse of the PCard or failure to follow the policies and procedures established in this manual may result in revocation of card privileges or other disciplinary action.

Manatee County Board of County Commissioners entered into an Eligible User Agreement with Bank of America, in accordance with the State of Florida Department of Management Services contract for PCard Services. Under this program, Bank of America will provide the County with PCard services using the internationally accepted Visa credit card and WORKS Payment Manager (WORKS) which is a web-based technology that connects payment management automation with the global Visa payment network.

### 1.4 Procedures

Procedures for administering the PCard program are needed in order to provide step-by-step instructions for proper use of the PCard and to document the Manatee County PCard Program activity while anticipating questions that may arise with use of the PCard. This procedures manual provides Manatee County Cardholders, Proxy Reconcilers and Approvers guidance on allowable purchases, as well as clear consequences for violations.

The Manatee County PCard Program is designed to improve efficiency in the processing of small dollar purchases from a broad variety of suppliers in categories approved by the County Administrator and the Clerk of the Court. The use of the PCard does not eliminate the obligation of the user to obtain quotes, or any required insurances as provided for in the Manatee County Procurement Administrative Standards and Procedures, and to adhere to the Code of Ethics for Officers and Employees: ref: Manatee County Personnel Policy, Section X; Florida Statutes Chapter 112; and the Manatee County Procurement Administrative Standards & Procedures Manual.

NOTE: Unless otherwise delegated, only the Board of County Commissioners or, the County Administrator and Purchasing Official has the authority to enter a contract on behalf of the County regardless of the dollar value.

## 1.5 PCard Program Overview

The Manatee County PCard Program has been designed to allow Cardholders to directly purchase small dollar items from suppliers. It should be viewed as a supplemental tool to purchase approved items which are more efficiently bought by a PCard, or to buy from suppliers who routinely only do business via credit card or cash. Using this system will reduce the time and paperwork normally associated with these types of purchases. In addition, the County will recognize savings in administrative time and effort spent to process such transactions.

The Manatee County PCard Program streamlines payments for goods and services for County business use by eliminating the administration burdens and costs associated with traditional methods of payment. The PCard may be used as the method of payment for purchases up to \$5,000.00 that are preapproved and go through the department approval process prior to completing the purchase. Point of sale transactions include purchases made at a physical store, in person, online, or over the phone.

The goal of the PCard Program is to optimize and expand the use of PCard purchases to allow for greater administrative and operational efficiencies as well as cost savings by streamlining and simplifying the procurement/disbursement process. Purchases shall only be made for official business on behalf of the County.

The PCard Program is designed to improve efficiency in acquiring and payment processing of approved purchases from any supplier that accepts a PCard. Cardholders can purchase approved goods, commodities and services directly from suppliers. Each PCard is issued to a specific County employee and Manatee County is clearly shown on the card as the governmental buyer of the goods and services. All Cardholders are encouraged to identify and use the card for payment of all transactions up to the threshold of \$5,000.00. This will allow the County to fully realize the potential benefits of this Program. Some of these benefits include:

- Delegation of accountability to departments for small dollar purchases
- Convenience of purchasing without a purchase order for purchases up to \$5,000.00
- Faster delivery of goods or services
- Expanded list of suppliers from whom purchases can be made
- Faster payment to the supplier
- Lower transaction processing cost per purchase
- Increased cash rebates to the County
- Electronic access to management information
- Reduction in paperwork
- Simplified procurement process for small dollar purchases

## **1.6 How the PCard Program Works**

The PCard Program is administered by the Procurement Department which coordinates issuance, maintenance, and cancellation of cards with the County's Card Issuer, Bank of America.

Once a PCard request is approved and a PCard is issued, procurement authority and responsibility is delegated to the Department.

The PCard Program simplifies the procurement/disbursement process enabling an authorized Cardholder to place orders directly with suppliers.

When a purchase authorization is requested by the supplier at the point-of-sale, the Visa PCard system validates the transaction against preset limits established by the County. All transactions are approved or declined (electronically) based on the PCard authorization criteria established. The authorization criteria may be adjusted as needed and may include, but is not limited to, the following:

- Single purchase limit
- Monthly spending limit
- Approved Merchant Category Codes.

The authorization process occurs through the electronic system that supports the PCard processing services under Manatee County's agreement with the Card Issuer.

There are several important roles in the PCard Program with specific responsibilities for each as noted in Section 1.7 below.

## **1.7 Program Participants and Responsibilities**

### **1.7.1 Card Issuer**

Bank of America is Manatee County's PCard provider. Bank of America's services include issuing Visa PCards to Manatee County employees, providing electronic transaction authorizations, and billing Manatee County for all purchases made on the PCards.

### **1.7.2 Purchasing Official**

- a. Assumes overall responsibility for the PCard Program;
- b. Provides direct oversight of the PCard Program;
- c. Designates a PCard Administrator;
- d. Establishes PCard procedures;
- e. Informs requesting upper management and Department Directors or designees of situations involving improper use of the PCard;
- f. Revokes the delegation of purchasing authority and the PCard when required;



- g. Coordinates with the Clerk of the Circuit Court's Finance Department as needed;
- h. Reviews, amends, and approves appropriate requests for individual PCards submitted by Department Directors;
- i. Establishes, revokes, modifies, or suspends an individual's access to use of a PCard, or the WORKS application, if the Purchasing Official determines that such action is in the best interest of the County;
- j. Ensures the PCard Administrator carries out all of the responsibilities and requirements, including general duties, monitoring, and controls;
- k. Reviews and approves revisions to the County's PCard Program procedures and all amendments prior to submission to the Chief Financial Officer for approval by the County Administrator.
- l. The Purchasing Official reserves the right to change or delegate the responsibilities of the PCard Administrator to other Procurement staff members at their discretion.

### **1.7.3 PCard Administrator**

- a. Coordinates the issuance and cancellation of PCards;
- b. Participates in ongoing program reviews;
- c. Assists Cardholders in resolving billing disputes;
- d. Coordinates and maintains internal controls, including authorization of PCards and changes of spending authority based on Board declared emergencies;
- e. Distributes procedures and Cardholder guides/manuals;
- f. Establishes and monitors benchmarking objectives;
- g. Develops and conducts specific training for Cardholders, Proxy Reconcilers and Approvers;
- h. Evaluates PCard feedback from suppliers and Cardholders;
- i. Monitors, and adjusts as needed, Merchant Category Code (MCC) Groups;
- j. Conducts periodic audits to ensure that Departments are following the Manatee County Procurement Administrative Standards & Procedures and this procedure;
- k. Follows the PCard Procedure for fraudulent charges, upon completion of an investigation of suspected fraud conducted by the Finance Department and final approval from the Purchasing Official;
- l. Follows the PCard Procedure for Violations and Consequences, upon completion of an investigation of suspected misuse and/or abuse conducted by the Finance Department and final approval from the Purchasing Official;
- m. Identifies cards with little or no usage to determine if cards are needed;
- n. Cannot be a Cardholder.

### **1.7.4 Department Director**

- a. Reviews and approves or denies individual requests for PCards for employees within their department;
- b. Sets Cardholder spending limits within delegated authority and under the established guidelines;



- c. Appoints a Proxy Reconciler and Approver for each Cardholder in their department;
- d. Addresses situations involving improper use of the PCard;
- e. Disciplines Cardholders who violate the PCard Program procedures and related Manatee County Procurement Administrative Standards and Procedures pursuant to the Manatee County Personnel Policy.

#### **1.7.5 Department Proxy Reconciler**

- a. Upon appointment by the Department Director, serves as a Proxy Reconciler for each Cardholder in their department;
- b. Serves as liaison to Procurement and Finance;
- c. Reconciles transactions for Cardholders under their purview, and signs off on the transaction(s) in the WORKS application on behalf of the Cardholder; follows up to ensure the transactions have been signed off by the Approver in WORKS;
- d. Ensures transactions that post to the WORKS application are signed off and all appropriate backup documentation is sent to the Finance Department weekly and no later than the 10<sup>th</sup> of the month;
- e. Responds to requests from the Finance Department for additional supporting documentation or clarification of purchase. Such requests should be responded to in a prompt manner (within 24 hours, if possible);
- f. Assists Cardholders on all disputed purchases, credits and billing errors. Disputes or errors that cannot be resolved will be referred to the PCard Administrator;
- g. Collects expired PCards and distribute renewal cards as provided by the PCard Administrator;
- h. Notifies the PCard Administrator of Cardholders who have transferred to another department or have left the employment of Manatee County. In either case, the Department Proxy Reconciler shall collect the Cardholder's PCard and may either shred the card or delivers it to the PCard Administrator for destruction. The Proxy Reconciler shall also communicate with the exiting Department's Human Resources liaison to ensure that HR Form 114, Property Checklist has been completed;
- i. Notifies the Department Director and the PCard Administrator of suspected misuse, abuse, or fraud on transactions;
- j. Attends PCard, Proxy Reconciler, and any other related training;
- k. All Proxy Reconcilers are required to sign the Proxy Reconciler/Approver Agreement.

#### **1.7.6 Cardholder**

- a. Holds and secures assigned PCard;
- b. Ensures that all purchases serve a public purpose;
- c. Ensures that purchases are in compliance with the PCard Program procedures and relevant sections of the Manatee County Procurement Administrative Standards and Procedures;
- d. Makes purchases that are preapproved and go through the department approval process prior to completing the purchase;

- e. Obtains detailed invoices or itemized receipts for all purchases. The invoice or receipt must show a method of payment clearly identified or show a zero balance due. Invoice should not have a house account number when paid by PCard;
- f. Obtains certificates of insurance as required in Section 3.12 – Insurance;
- g. Ensures that Florida sales tax is not charged on purchases. If tax is charged a credit must be obtained; for tax less than \$6.00, a reasonable effort to obtain a credit shall be demonstrated and documented under “Comments” on the transaction in the WORKS application. Reasonable effort means contacting the vendor and documenting the date, time, and name of person spoken to;
- h. Orders materials or services as authorized by the Cardholder’s approved single transaction limit;
- i. Submits sales receipts/invoices to the designated Department Proxy Reconciler as soon as possible after making the purchase, at a minimum, weekly;
- j. Identifies and follows up on reported fraudulent activity, disputed charges and credits for sales tax until resolved. Prepares proper paperwork when required;
- k. If fraud is suspected, notifies the Credit Card Issuer Fraud support immediately (866-500-8262). Reference Section 3.20 - Fraudulent Charges;
- l. If a card is lost or stolen, notifies the Credit Card Issuer Cardholder support immediately (888-449-2273). Reference Section 3.19 – Misplaced, Lost or Stolen Cards;
- m. Maintains documentation as required by Board Policy and the Procurement Administrative Standards and Procedures for audit purposes;
- n. Complies with internal control procedures in order to protect the County’s assets. Responsibilities include keeping receipts, reconciling monthly statements and following proper card security measures;
- o. Attends PCard and any other related training;
- p. All Cardholders are required to sign the Purchasing Cardholders Agreement.

#### **1.7.7 Approver**

- a. Reviews transactions for accuracy; to include, but not limited to verifying comments have been entered; account key and object code are correct; is the purchase available through a blanket purchase order; and that the purchase serves a public purpose;
- b. Carefully reviews all documentation to ensure that all appropriate back up documentation are included in the submission to Finance;
- c. Have a thorough knowledge of the cardholders’ job responsibilities in order to determine if purchases are job-related or otherwise authorized;
- d. Ensures compliance with the PCard Program procedures and Procurement Administrative Standards and Procedures, for appropriate PCard use;
- e. Approves transactions in WORKS within the timeframe established in the PCard Program Procedures Manual;
- f. Ensures no prohibited purchases have been made;
- g. Ensures proper documentation is attached to the Cardholder’s transactions including itemized receipts;

- h. When reviewing and approving transactions it is the Approver's responsibility to follow up with Cardholders about questionable transactions and report any non-compliance identified during their review to the PCard Administrator;
- i. Maintains knowledge of County procurement policies and procedures related to use of the PCard;
- j. Cannot approve own transactions if also a Cardholder;
- k. Attends PCard, Approver, and any other related training;
- l. All Approvers are required to sign the Proxy Reconciler/Approver Agreement.

#### **1.7.8 Finance Department:**

- a. Reviews the Transaction Report for Finance and supporting documentation from the Department Proxy Reconcilers on a daily basis;
- b. Performs the standard pre-audit function on each PCard transaction, and reviews the supporting documentation for adherence to County policies and procedures, including, but not limited to, the PCard Program Procedures and the Procurement Administrative Standards and Procedures;
- c. Processes the PCard payment from the monthly billing statement;
- d. Conducts a full investigation of any suspected misuse, abuse or fraud and presents the findings to the PCard Administrator and Purchasing Official for review.
- e. Upon completion of any investigation, notifies the PCard Administrator of any Cardholder or Department Proxy Reconciler who is failing to comply with the terms of the PCard Program procedures.

## **SECTION 2. ASSIGNMENT AND CONTROL OF THE PCARD**

### **2.1 Who is Eligible for a PCard**

- a. A full-time employee with job responsibilities that require the purchase of certain types of goods or services under current small dollar purchase guidelines, may be eligible for PCard privileges. A PCard request form must be approved by the Department Director and Purchasing Official prior to the issue of a PCard;
- b. The employee will be required to attend an initial PCard training prior to the card being issued and refresher training will be required by all cardholders as well. Before the card is issued, new cardholders must sign the Manatee County Purchasing Card Agreement.

### **2.2 How to Obtain a PCard**

- a. PCards shall be applied for by completing a Manatee County PCard Program Request Form. The prospective Cardholder's director must approve the request. The PCard Procedures Manual must be read before a card request is made. The Policy and Procedures provide information about the process, the types of purchases that can and cannot be made, records that must be maintained and reconciled, and additional information about the program. There will only be one responsible individual assigned

- to each card, and only one card will be issued to each Cardholder;
- b. Prospective Cardholders must attend an initial training class that covers the PCard procedures. Cardholder training is available on the County's Learning Management System (LMS). Once this training class has been completed, send a copy of the training Certificate of Completion, PCard Program Request form and a signed PCardholder Agreement to the PCard Administrator at [pcardadmin@mymanatee.org](mailto:pcardadmin@mymanatee.org).

## 2.3 Issuance of PCard

- a. Each PCard is issued to a named individual, and Manatee County Government is clearly shown on the card as the governmental buyer of the goods/services;
- b. PCards are issued to individual employees who routinely procure small purchases of goods or services and to designated employees for emergency purchases during declared emergencies;
- c. PCards shall only be used for authorized County purchases that serve a public purpose;
- d. All requests for PCards must be made by the Department Director using the PCard Request Form;
- e. When the PCard Administrator receives a PCard from the issuing bank, the named Cardholder will be required to personally take receipt of the PCard after attending mandatory training provided by the Procurement Division. The Cardholder will be provided a copy of this procedure and is required to sign the PCard Agreement Form;
- f. The PCard Administrator, will notify the Cardholder or the Department Proxy Reconciler for the Cardholder, upon the receipt of renewal or replacement PCards;
- g. The Cardholder or Department Proxy Reconciler is responsible for picking up the renewal or replacement PCard(s) from the Procurement Division, unless directed otherwise by the PCard Administrator;
- h. The Department Proxy Reconciler is responsible for proper distribution of the renewal or replacement PCard(s) as directed by the PCard Administrator;
- i. Cardholders are responsible for activating their card by calling the toll-free number provided to them on the face of the new PCard;
- j. Cardholders shall sign the back of their PCard;
- k. Requests for changes to current Cardholders (i.e., change departments; change emergency status; etc.) will be made by completing and executing the PCard Program Request Form and submitting it to the PCard Administrator;
- l. Requests for change in limits will be made using the PCard Limit Change Request Form;
- m. Where a department is requesting a PCard with standard limits and or exceptions to those standard limits as defined in **Spend Limits**, below, the Purchasing Official is authorized to make the approval.

## 2.4 Card/Account Number Security

- a. The Cardholder must take reasonable precautions to protect the PCard and the account number from loss or theft;

- b. The Cardholder should not save or store their card account number and expiration date in the web browser or supplier's web site unless previously approved by the Purchasing Official;
- c. The Cardholder shall perform due diligence when purchasing from an unknown source (i.e., start-up .com companies, etc.). Due diligence shall mean verify website has encryption technology to keep payment information secure. The Cardholder should also check the merchant has no bad rating or reviews either on website or through the Better Business Bureau (BBB); is licensed to do business in Florida via SunBiz, if appropriate; has valid and confirmed contact information.

## 2.5 Spend Limits

- a. Standard single transaction limit (STL) shall be \$5,000.00 and the standard billing cycle limit shall be \$20,000.00.
- b. Exceptions can be requested by completing a PCard Limit Change Request Form for approval by the Purchasing Official. Provide an explanation of the circumstances which warrant different amounts. Based on a review of the information provided, the PCard Administrator may recommend that the Purchasing Official authorize the proposed changes for individual Cardholders. Only upon written approval of the Purchasing Official, shall an exception be made;
- c. From time-to-time Cardholders may need to make a purchase that exceeds their STL (e.g., hotel charges). A temporary increase in limits may be requested by the Department Director or designee, by completing the PCard Limit Change Request Form and email to the PCard Administrator at [pcardadmin@mymanatee.org](mailto:pcardadmin@mymanatee.org). Submit three quotes or a single/sole source request for the Purchasing Official's approval as supporting documentation. An explanation for the request, the Cardholder name and the increase amount must be stated on the form. The PCard Administrator will forward the request to the Purchasing Official with a recommendation for approval or denial. If approved, the Cardholder's limit(s) shall be temporarily increased with an automatic return to their originally approved limits once the transaction has posted;
- d. The total cost of any transaction must not exceed the established single transaction limit, unless previously approved via a temporary increase request. A single purchase may be comprised of multiple items purchased in one transaction; however, a single purchase shall not be artificially split into two or more transactions either by one or more Cardholders so as to avoid or circumvent the single transaction or Cardholder limits;
- e. Cardholders with an STL above \$5,000.00 must ensure their purchases comply with the Procurement Administrative Standards and Procedures, such as sole source / single source approval, or three quotes with Purchasing Official approval or emergency purchase approval by the County Administrator;
- f. Annually, the PCard Administrator will analyze Cardholder activity to determine that spending limits are consistent with usage. Inactive accounts (those with no activity over the past 12 months) may be deactivated.



## **2.6 Merchant Category Code Groups**

- a. Every Supplier who accepts credit cards must identify their type of business with their issuing bank. This identity is coded as a four digit number called a Merchant Category Code (MCC). Some codes have been blocked due to the nature of the business, e.g., liquor stores; limousine service; etc.;
- b. There may be instances when a blocked MCC will need to be removed to allow the Cardholder to make a legitimate County purchase. To request a temporary or permanent removal of an MCC, contact the PCard Administrator. Provide the reason for the request, merchant name and cost of purchase.

## **2.7 Training**

- a. Training is mandatory for all Cardholders, Proxy Reconcilers, and Approvers. Access to the WORKS application or the issuance of a PCard will not be authorized until such training has been completed;
- b. The PCard Administrator shall provide training to Cardholders, Department Proxy Reconcilers and Approvers. Registration for training is through the County's Training Portal on the Intranet;
- c. Cardholders must attend refresher training one year after initial training and receipt of their PCard and within 30 days of the notification given by the PCard Administrator. Failure of the Cardholder to attend training when notified by the PCard Administrator will result in the temporary suspension of their PCard until they have attended the refresher training;
- d. Proxy Reconcilers/Approvers must attend refresher training one year after initial training and within 60 days of the notification given by the PCard Administrator. Failure of the Proxy Reconciler/Approver to attend the training within this time frame will result in the temporary suspension of their access to Works;
- e. Cardholders, Proxy Reconcilers, and Approvers may be required to complete refresher training if recommended by their Supervisor / Manager on an as needed basis;
- f. If needed, special training sessions can be arranged for an individual or department by contacting the PCard Administrator.

## **2.8 Changes, Termination, Resignation, or Transfer of Employee**

- a. Name changes and other changes to a Cardholder, Proxy Reconciler or Approver profile can be made by submitting a PCard Program Request Form to the PCard Administrator by email to [pcardadmin@mymanatee.org](mailto:pcardadmin@mymanatee.org);
- b. Notify the PCard Administrator immediately if an employee is terminated for disciplinary reasons so that the card can be deactivated immediately;
- c. When a Cardholder, Proxy Reconciler and Approver ends employment, changes job status or transfers to another department, the exiting Department Proxy Reconciler shall notify in writing (email is acceptable) the PCard Administrator immediately of the changed status and communicate with the exiting Department's Human Resources liaison to ensure HR Form 114, Property Checklist has been completed and the PCard collected and destroyed;

- d. If the department is unable to collect the PCard when an employee terminates, the Department Proxy Reconciler must immediately notify the PCard Administrator, who will ensure that the card is canceled;
- e. Once notified by the Department Proxy Reconciler of a change in job status of a Cardholder, the PCard Administrator will immediately close the account in the Works Application, and check for any pending transactions before deactivating the user;
- f. Cardholders and Department Proxy Reconcilers are required to coordinate reconciliation of PCard transactions prior to transferring to another department or ending employment.

## 2.9 Cardholders on Leave of Absence

- a. When a Cardholder is on an extended leave of absence the Department Proxy Reconciler will inform the PCard Administrator by email to [pcardadmin@mymanatee.org](mailto:pcardadmin@mymanatee.org). The PCard Administrator will move the Cardholder into the Idle Profile (zero dollars);
- b. Upon the Cardholder's return from the leave of absence, the Department Proxy Reconciler will notify the PCard Administrator by email to [pcardadmin@mymanatee.org](mailto:pcardadmin@mymanatee.org) to reinstate the PCard. The PCard Administrator will move the Cardholder to their original profile.

## 2.10 EOC Activation (Emergency) Procedure

- a. Department Directors may designate specific employees to have a PCard for emergency situations in which the Emergency Operations Center (EOC) is activated;
- b. There are two emergency profiles in WORKS to accommodate the spending levels of these Cardholders:
  - i. EOC Profile 1 – single transaction limit of \$50,000.00 with a monthly limit of \$50,000.00.
  - ii. EOC Profile 2 – single transaction limit of \$19,999.99 with a monthly limit of \$50,000.00.
- c. Upon the declaration of a local State of Emergency, Cardholders who have been previously identified will have their profile changed to the appropriate level by the PCard Administrator;
- d. On a case-by-case basis, to be determined by the Director of Public Safety, the Chief Financial Officer, and the Purchasing Official, previously identified Public Safety Cardholders may have their limits increased during a Level 2 activation;
- e. Subsequent to activation, any emergency Cardholder given the authority to spend in excess of \$35,000.00 (regardless of whether they purchase or not) will be required to complete a Financial Disclosure Form. *This is a statutory requirement.*
- f. Cardholders with emergency status must follow the procedures outlined in this manual and Administrative Standards and Procedures manual for purchases above the normal single transaction limit of \$5,000.00 and for emergency purchases unless the policy/procedure has been waived by the Purchasing Official and Chief Financial Officer.



## 2.11 Financial Disclosure

- a. Pursuant to Section 112.3145, Florida Statutes, Cardholders authorized to make any purchase exceeding \$35,000.00, regardless of whether they make such a purchase or not, is required to file a Financial Disclosure Form with the Supervisor of Elections for the County in which they reside;
- b. When a Cardholder is placed in a profile with a single purchase limit in excess of \$35,000.00, the PCard Administrator will notify the Executive Administrative Assistant to the Board of County Commissioners the name of the Cardholder(s) so they may be reported to the State Commission on Ethics. The State Commission on Ethics shall notify the Supervisor of Elections Office with a list of names who must complete the Financial Disclosure Form;
- c. During the first quarter of the year after a Cardholder is placed in a high level profile, the Supervisor of Elections will notify the Cardholder to complete a Financial Disclosure form online (forms are completed after-the-fact);
- d. The Cardholder will complete the Financial Disclosure in accordance with the time frames and deadlines specified by the Supervisor of Elections;

***Filing the Financial Disclosure Form is a personal statutory duty and failure to comply may result in mandatory fines of \$25.00 per day for each day the form is late. Manatee County will not pay for any late fees assessed against a Cardholder for failing to file the disclosure form on time.***

## 2.12 Separation of Duties

- a. A proper separation of duties ensures that each person's review of a transaction acts as a complementary check against the other. No one person should be responsible for an entire transaction. To meet a proper separation of duties, an individual must not serve in more than one role when processing transactions in WORKS;
- b. A Cardholder shall not serve as an Approver for his/her transactions. Sufficient internal controls shall be established and implemented to ensure that a knowledgeable individual such as a direct supervisor within the department or division reviews the statement, receipts and reconciliation documents in a timely manner during regularly scheduled billing cycles and approves the transactions in WORKS;
- c. An individual shall not serve as Proxy Reconciler and Approver for the same transaction.

## SECTION 3. CARDHOLDER USE OF THE PCARD

### 3.1 Making a Purchase

To make a purchase using the PCard, do the following:

- a. Be certain the transaction is consistent with the applicable rules for PCard usage;
- b. Obtain your department prior approval for all planned, routine purchases;
- c. To receive all applicable discounts, be sure to inform the supplier that your purchase is for Manatee County. Notify the supplier that the purchase is exempt from Florida State

sales tax and provide the supplier with a copy of the exemption certificate. A copy of this form can be found on the Intranet. This Sales and Use Tax Certificate of Exemption certifies that your purchase is for County business;

- d. Verify the total amount to be charged with the supplier. Prior to signing a charge slip or authorizing a purchase by telephone, be sure to have the supplier identify and list all charges related to the transaction. All shipping & handling charges must be listed as a separate line item on the receipt and must be clearly identified;
- e. Ensure supplier does not apply a surcharge to the purchase since such charges are discouraged;
- f. All receipts, proof of delivery, and other documentation supporting the purchase should be attached to the corresponding transaction as supporting documentation;
- g. Cardholder must not accept any gift or gratuity from any source when it is offered, or appears to be offered, to influence cardholder decision-making regarding PCard purchases.

### 3.2 What Can and Cannot be Purchased with the County PCard

- a. The PCard may be used for general supplies costing up to \$5,000.00 (including shipping) when not prohibited by Federal, State, and County Guidelines;
- b. All purchases must be made in accordance with established County purchasing policies and must be for expenses associated with official County business and must serve a public purpose. Use of the PCard for unauthorized, inappropriate, or personal items may result in penalties as indicated in this PCard Program Procedures Manual;
- c. Splitting of purchases with the PCard is prohibited. Transaction splitting is the practice of committing multiple PCard transactions to circumvent the Cardholder's one-time transaction limit, bypass County competitive bidding requirements, or avoid the card's monthly card limit;
- d. Any expenditure with one supplier for products or supplies that you anticipate will exceed \$5,000.00 require due diligence by Procurement;
- e. Manatee County PCardholders are designated as County purchasing agents with strict adherence to the County's Code of Ethics.

### 3.3 Non-Allowable Purchases

This list includes examples and is NOT all inclusive. Non allowable purchases include any items prohibited by Law, Regulation, or Policy. Cardholders should first contact the PCard Administrator prior to purchasing any items that seem questionable or may have the appearance of being inappropriate.

Purchase Category		Examples of Excluded Purchase
1	Florida Sales Tax	Manatee County is tax exempt. Be sure to inform the supplier that your purchase is for Manatee County and provide the supplier with a copy of the tax exemption certificate which certifies that your purchase is for County business.
2	Food & Catering	Only food purchases that are authorized by a Board approved Resolution are allowed. All others are prohibited.

		Cardholder must have prior authorization from the PCard Administrator and Purchasing Official to use card for food purchases.
3	Tips for meals and deliveries	Tips for meals and for delivery of catering that exceed 20% of the total amount of the meal are not allowed and will not be reimbursed.
4	Cash Advances	All cash advances including those received through teller machines, bank or as “cash back” at the time of transaction.
5	Alcoholic Beverages	All types except where authorized by a Resolution of the Board of County Commissioners.
6	Gifts, Gift Cards, and Calling Cards	Any type or style of gift including awards and jewelry; any type of telephone calling cards in the U.S. and abroad; any type of gift card except where authorized by a Resolution of the Board of County Commissioners.
7	Leases and rentals	Long term rental or lease of land or buildings of any type and ongoing in nature.
8	Purchases for personal use	Any item for personal use by an individual. Examples include but are not limited to: coffee, bottled water or other snacks or beverages; tissues, hand sanitizer; personal magazine or newspaper subscriptions.
9	Entertainment Expenses	All types including movie tickets, amusement park tickets; arcades except where authorized by a Resolution of the Board of County Commissioners.
10	Drugs	All over the counter and prescription drugs.
11	Automatic Renewals	Card should not be stored with supplier.
12	Meal Tickets	Meal tickets to attend ceremonies to receive personal award and any other non-county business related functions.
13	Greeting Cards	Holiday cards, sympathy cards, birthday cards, wedding cards, retirement cards, “Congratulations” cards, “best wishes” cards, “thinking of you” cards, “good luck” cards, “get well soon” cards; any other types of cards.
14	Contributions	Contributions to charitable, non-charitable organizations, political groups and individuals.
15	Parking citations	Fines imposed for parking violations when driving a County vehicle shall be paid by the driver of the vehicle.
16	Recurring charges	Weekly, monthly, quarterly charges.
17	Attorney and legal services	Fees for attorney and legal services.
18	Flowers	The purchase of flowers must have a public purpose that benefits the County such as for official County events.

### 3.4 Billing Cycle

- a. The billing cycle runs from the 5<sup>th</sup> of each month through the 4<sup>th</sup> of the following month (Example: January 5 through February 4);
- a. If the 4<sup>th</sup> falls on a weekend or a holiday, the billing cycle will drop on the last business day prior to the weekend or holiday (Example: If July 4<sup>th</sup> is on Friday, the statement will drop on Thursday, July 3<sup>rd</sup>, or if the 4<sup>th</sup> is on a Saturday or Sunday, the statement will drop on the Friday before the weekend).

### **3.5 Statements**

- a. The Credit Card Issuer will electronically provide billing statements for each Cardholder and one consolidated statement for all Cardholders to the PCard Administrator;
- b. This Statement of Account will list all transactions processed during the billing cycle;
- c. If no purchases were made on a PCard during the billing cycle, no Statement of Account will be generated unless adjustments for previously billed transactions have been processed during that cycle. This statement should be kept at the department for reconciliation purposes.

### **3.6 Weekly Submission**

- a. Proxy Reconcilers and Approvers are responsible for reviewing, verifying and signing off on transactions on a weekly basis;
- b. All transactions that have been signed off must be submitted to the Finance Department, with all appropriate backup documentation, on a weekly basis;
- c. Do not hold a transaction if there is a credit due. Process the charge with a comment in WORKS that a credit is pending;
- d. Transactions posting during the last week of the billing cycle must be reviewed, verified and approved and forwarded to the Finance Department by the 10<sup>th</sup> day of the month. If the 10<sup>th</sup> falls on a weekend or holiday, the deadline will be the last business day prior to the weekend or holiday;
- e. Failure to comply with the submission requirements may be grounds for suspension or revocation of PCard.

### **3.7 Quotes and Documentation**

- a. Quotes shall be documented and physically maintained for audit purposes at the office of the Cardholder (reference the Manatee County Administrative Standards & Procedures Manual, for guidance on quotes and Sole Source/Single Source purchases);
- b. If the total cost is up to \$5,000.00, no quotes are required but are strongly encouraged. See Administrative Standards and Procedures, Section 501.08 IV. Exemptions for items that are exempt from obtaining quote;
- c. Supporting documentation is subject to retention in accordance with State requirements. Such documentation is subject to audit by the Manatee County Clerk of the Circuit Court and spot audits by the Procurement Division;

- d. Transactions above \$5,000.00 for Sole Source / Single Source purchases require an approved Sole Source / Single Source form by the Purchasing Official before the purchase is made;
- e. Purchase Orders are not required for purchases over \$5,000.00 that have been paid by PCard;
- f. For emergency purchases, see Administrative Standards and Procedures Manual Section 501.08.II.2.

### **3.8 Receipts and Invoices**

- a. All transactions must be supported by a detailed or itemized receipt or invoice listing what was purchased, unit cost, number of units purchased, total cost, supplier name, etc., and any other applicable backup documentation. Although packing slips may be required to show proof of delivery (if provided), they are not sufficient documentation in lieu of a receipt or invoice and will only be permitted in instances where the Cardholder documents unsuccessful attempts to obtain a receipt;
  - i. If not itemized, request the Supplier to itemize the receipt or invoice (i.e., what was purchased, unit cost, number of units purchased and total cost);
  - ii. If not detailed (i.e., only lists SKU numbers), handwrite the description of what was purchased next to the itemized listing;
- b. A method of payment must be included on the invoice (e.g., credit card; Visa). The invoice cannot show a balance due without a method of payment listed;
- c. The Supplier name listed on invoices and receipts should match the posted transactions in WORKS;
- d. If paying for registration, travel, memberships, etc., additional forms are required to be submitted along with the Transaction Detail Report for Finance. Examples include: Travel/Training Authorization Form; Authority to Join an Organization, etc. These forms are located on the Intranet;
- e. The receipt/invoice must have the Cardholder's signature. The Cardholder may sign the Transaction Report for Finance in lieu of signing each invoice/receipt.

### **3.9 Missing Documentation**

- a. If an invoice/receipt is not available the Cardholder shall submit a PCard Missing Receipt form, approved by the Department Director, with a complete description of the purchase and state the reason why the invoice or receipt is not available;
- b. This form must be attached to any other supporting documentation to Finance, and a copy sent to the PCard Administrator at [pcardadmin@mymanatee.org](mailto:pcardadmin@mymanatee.org);
- c. Repeated incidents (three) of missing documentation may result in the suspension of the employee's PCard and/or disciplinary action.

### **3.10 Commodities and Travel Expenses**

- a. At NO TIME should BACK ORDERS be charged to a PCard. All items purchased must be readily available. Back ordering is prohibited. If it is determined that an item(s) is on back order, the item must be cancelled, and a credit issued;



- b. The Cardholder must instruct the supplier to charge the PCard at the time of shipment so that the commodities are received before weekly submission to the Finance Department;
- c. Manatee County is a tax exempt entity; if tax is charged on a purchase, the Cardholder must request a credit and document who they spoke with and the date in the transaction comment field in the WORKS application. The supplier may request a copy of Manatee County's tax exempt certificate. For convenience, the County's tax exempt certificate is posted on the County's intranet site under the All Documents tab, Financial Management;
- d. Items that require shipping must be received from the supplier and included in the 30-day billing statement. The order should not be placed without this assurance;
- e. The Cardholder must confirm that shipping is included in the price quoted, if applicable;
- f. A Travel/Training Authorization Form must be approved by the employee's Department Director or designee, prior to making payment for training and travel;
- g. The PCard may be used to pay for room accommodations when traveling on approved County business that requires an overnight stay. All other hotel charges, including meals, drinks, movies, etc. are prohibited and must be placed on an individual's personal credit card or paid in cash;
- h. Hotel reservations shall not be made through a discount broker (e.g., Expedia, Travelocity, etc.). These services charge the card for the entire stay at time of booking. Nor shall full payment be made to the hotel prior to the end of the stay;
- i. The PCard shall not be used to pay for accommodation booked through Airbnb. This service charges the card at the time of booking and also charges a guest service fee;
- j. A first night hotel deposit is allowable; however, all backup documentation must be provided to Finance within a week of the transaction posting in the WORKS application. NOTE: Manatee County is not exempt from hotel sales tax in other States;
- k. It is permissible to use the same PCard for multiple hotel rooms or registrations; however, ensure the card is run separately for each traveler/registrant. This is not considered a split transaction as each traveler/registrant will have their own travel paperwork that is a stand-alone audit packet. In addition, each traveler must sign the hotel folio in addition to the Cardholder;
- l. The purchase of airfare is allowed, and the Cardholder may use a discount broker (Expedia, Travelocity, etc.) to make the purchase. Additional costs for extra luggage, airport parking, taxi and shuttle services may also be placed on the PCard. For additional travel information, please reference the Per Diem and Travel Procedure;
- m. Advance payment is not allowed except as authorized (e.g., first night deposit, airfare, registration, etc). For additional travel information, please reference the Per Diem and Travel Procedure;
- n. It is permissible to use the PCard to purchase postage stamps;
- o. Sunpass payment is allowed on the PCard when traveling for County business in a County vehicle;
- p. The PCard may be used for gas purchase when traveling in a County vehicle, or rental vehicle for County business, if gas cards are not available from the Clerk's Office Finance Department.

### **3.11 Services**

- a. The Cardholder must instruct the supplier to charge the PCard after services are rendered so that the service is complete before the charge is posted to the card.

### **3.12 Insurance**

- a. Any services to be performed on County property by the supplier require a current Certificate of Insurance before authorizing the supplier to proceed, unless waived in advance by the Risk Manager;
- b. The Cardholder will confirm that the supplier is properly licensed and insured at the time the service is performed;
- c. The Cardholder shall obtain and retain a copy of the certification of supplier's insurances for general liability, automobile liability, employer's liability and Workers' Compensation as well as any other applicable insurance requirements and bonds when the supplier delivers goods and provides services at County locations. Workers' Compensation must comply with Florida Statute 440, and General Liability insurance should be in an amount comparable to the risk of the project or purchase. NOTE: insurance certifications are not required for the delivery of goods via commercial courier service or common carrier or when services are not provided at a County location.
- d. A copy of the endorsed insurance certificate(s) shall be included in the backup paperwork and maintained by the department for audit purposes.
- e. Forward any questions regarding what insurances are applicable to the County Risk Management Department.

### **3.13 Approving Transactions in WORKS**

WORKS is a web-based technology proprietary to Bank of America that connects payment management automation with the global Visa payment network and a platform for management of PCard transaction processing and the administration of users and PCards.

- a. The Proxy Reconciler will receive an e-mail notification when a transaction is pending processing;
- b. Each transaction needs to be opened and reviewed. The review should consist of verifying validity of transaction, check/modify the account key and object code;
- c. A comment should be entered in WORKS outlining pertinent transaction details. For example, purchases made with some suppliers would appear to be unallowable however, some purchases might be allowed if justified with a specific business purpose. Reference the Resolution number if a purchase is authorized by a Board approved Resolution. The Proxy Reconciler should document the business purpose in the comment section to avoid further inquiry from the PCard Administrator or auditors;
- d. Each transaction must be verified and signed off in WORKS by the Proxy Reconciler and Approver. The Proxy Reconciler should send the Transaction Report for Finance with all supporting documentation attached to Finance;
- e. Transactions must be processed on a weekly basis and no later than the 10<sup>th</sup> of the



month for submission of documentation to Finance.

### **3.14 Record Keeping**

For audit purposes, Proxy Reconcilers must obtain and retain supplier documentation for purchases. Proof of purchase and proof of receipt are required.

- a. Proof of Receipt is the printed record given to a Cardholder at “check-out” that identifies the supplier, the date of sale, lists the purchases made, the total amount of the transaction including any discounts, and other adjustments, the amount paid and the method of payment. Acceptable receipts include printed receipts and/or electronic receipts. Invoices and statements should include the following information:
  - Supplier name, address
  - Item description
  - Quantity, unit, unit price, for each item
  - The invoice number and invoice total
  - Discount, if applicable
  - Date of order and shipping date
- b. If a receipt is missing, the Cardholder must first attempt to secure a copy of the receipt from the supplier. If one is not available a PCard Missing Receipt form must be prepared and signed by the Cardholder and Department Director;
- c. House accounts should not be included on invoices and receipts.

### **3.15 Surcharge and Convenience Fees**

- a. What is a payment card surcharge?

When you use a credit card to pay for goods or services the merchant is charged a fee by the credit card company. These “interchange fees,” also called “swipe fees,” are often calculated as a percentage of the amount you purchase. Some merchants may choose to recoup these fees by adding a surcharge to your purchase. Starting on April 15th, 2023, merchants in the United States are restricted to surcharge customers to a 3% cap for those who pay with Visa credit cards. Credit card surcharges are legal except in some states with laws that prohibit credit card surcharges. Florida has a law prohibiting credit card surcharges, but that law was held unconstitutional by federal courts. Therefore, merchants in Florida may add a surcharge to credit card purchases;
- b. Payment of surcharge fees are discouraged. Before making a purchase find out if the merchant will add a surcharge. If the merchant refuses to remove the surcharge, if possible, select another supplier who does not charge a fee for using a credit card;
- c. Surcharges on payments using PayPal are not allowed, Cardholder should seek alternative methods of payment;
- d. A convenience fee is a fixed charge added to a purchase price. For example a merchant may charge a convenience fee for the privilege of being able to pay online.
- e. Payment of convenience fees are discouraged. Before making a payment find out if the merchant will add a convenience fee. If the merchant refuses to remove the fee, if

possible, select another supplier who does not charge a convenience fee;

### **3.16 International Transaction Fees**

- a. If a Supplier is located out of the country, an International Transaction Fee may be charged by the Credit Card Issuer. The fee is a percentage of the total cost of the purchase and is not documented on the original receipt. The transaction fee will show in WORKS;
- b. There is no receipt associated with an International Transaction Fee, so you must reference the Supplier name and transaction number for the original charge in the Comments section of the transaction in WORKS. Sign off on the transaction and include it on the report to Finance;
- c. While viewing the transaction in WORKS, use the “print” key in the lower right hand corner to print the transaction to send as a receipt.

### **3.17 Sales Tax Charged by a Supplier**

- a. As previously detailed in this manual, Manatee County is exempt from paying Florida sales tax on purchases. Accordingly, sales tax should not be billed by suppliers. In the event sales tax is charged by a supplier and appears on a receipt, the following steps need to be taken by the Cardholder:
  - i. Contact the supplier and request that a credit be processed for the amount of the sales tax charged.
  - ii. Maintain written records of communications with suppliers regarding credits for sales tax.
- b. If the supplier refuses to issue a credit or does not issue a credit within the next billing cycle, please notify the PCard Administrator concerning your attempts to obtain a credit for the sales tax billed. DO NOT place any further orders with the supplier;
- c. Recovering charged sales tax requires time and effort that is not very productive for anyone. It is, therefore, essential that Cardholders make suppliers aware that Manatee County is exempt from sales tax before paying for a purchase.

### **3.18 Resolving Errors and Disputes**

- a. Problems with merchandise delivery or incorrect billing may occasionally arise. It is the Cardholder's responsibility to initiate action to resolve all such issues;
- b. Cardholders must contact the supplier directly when a billing problem or a problem with merchandise is first noted to attempt to resolve such problems directly with the supplier. When appropriate, one should ask the supplier to provide a credit to your PCard account. Under no circumstances should there be a direct cash refund from suppliers for credit card transactions;
- c. If a Cardholder is unable to resolve the problem directly with the supplier, the Cardholder should notify the PCard Administrator to assist in resolving or filing a dispute with Bank of America;
- d. All Bank of America disputes must be filed within 60-days of the transaction date.

### **3.19 Lost, Stolen or Misplaced PCards**

- a. If a PCard is lost or stolen, the Cardholder shall notify Bank of America immediately by calling (888-449-2273); and the PCard Administrator within one business day following the reported lost or stolen PCard;
- b. The Cardholder will be responsible for reporting all information required by this program, or which may be requested, to reduce the liability to Manatee County for lost or stolen cards;
- c. If an unauthorized transaction has posted to the account while the PCard is reported as missing, follow the directions as outlined in Fraudulent Charges, Section 3.20;
- d. Replacement PCards are generally received within three (3) business days after a request has been submitted to Bank of America by the PCard Administrator;
- e. If a PCard is misplaced, contact the PCard Administrator within one business day of discovering card has been misplaced so that the PCard can be temporarily deactivated while an attempt is made to locate the card.

### **3.20 Fraudulent Charges**

- a. The Credit Card Issuer monitors card accounts 24/7 for suspected external fraud and will place a hold on a card if there is suspicious activity;
- b. The Credit Card Issuer will contact the Cardholder and/or the PCard Administrator to verify the suspected external fraudulent charge;
- c. If the charge is determined to be external fraudulent, one of two things may happen:
  - i. The charge does not post to the account; which means the charge was declined.
  - ii. The charge does post to the account.
  - iii. In either situation, the Cardholder's PCard will be deactivated, and a new card issued. Delivery of a new card is usually three (3) business days.
- d. If fraud is suspected the Cardholder must immediately notify the Credit Card Issuer at 866.500.8262 and the PCard Administrator. The bank will request pertinent information regarding the transaction, cancel the current card, and order a new card for the Cardholder;
- e. Once you have notified the Credit Card Issuer and PCard Administrator, notify your immediate supervisor, and Proxy Reconciler;
- f. If the external fraud is suspected after normal business hours, then notification of the PCard Administrator, and the Department Proxy Reconciler must be made immediately upon the next business day;
- g. For external fraudulent charges that post to the account, an affidavit should be completed for the Credit Card Issuer, and a police report filed with the Manatee County Sheriff's Office (MSO) if required by the Credit Card Issuer;
  - i. The Credit Card Issuer will send the Cardholder an affidavit via email.
  - ii. The Cardholder must complete the affidavit and send it back to the Credit Card Issuer and include a copy to the PCard Administrator and to the Clerk's Accounts Payable Department.

- h. If internal fraud is suspected, the Cardholder's Department Director (or the County Administrator if the Cardholder is a Director), the Chief Financial Officer, the Purchasing Official and the Internal Audit Director of the Clerk of Court's Office shall be contacted by the PCard Administrator and apprised of the facts of the transaction. The PCard shall be placed in an idle account while the fraud is being investigated. The PCard Administrator shall cooperate fully in any internal County investigation, and/or any investigation launched by the Clerk of Court's Internal Auditor;
- i. If an investigation confirms that the provisions of this procedure have been violated, then the Cardholder shall be subject to discipline as provided for in the County's Personnel Policy. In addition, if an investigation reveals facts which, in the opinion of the County Attorney's Office, would support a finding of a violation of any portion of the Florida Code of Ethics for Public Officers and Employees and/or any provision in the Florida or federal criminal codes, then the County Administrator shall comply with the pension forfeiture notice requirement in Florida Statutes § 112.3173(4)(c); shall ensure vacation and leave payouts are forfeited pursuant to Personnel Policy § VII-A-6 and VII-B-14(e); and shall also refer the matter to the law enforcement agencies with jurisdiction to enforce the relevant criminal laws.

### **3.21 Disputed Charges**

- a. If a product or service is faulty or a transaction contains an error (e.g., overcharged, duplicate charge or order not received), the Cardholder must first attempt to resolve the issue with the supplier.
- b. If the supplier refuses or delays correction of the error, the purchase must be immediately disputed with the Credit Card Issuer at 888-449-2273. If the bank has been called to report a dispute, do not enter a dispute in WORKS
- c. Once the dispute is reported to the bank, the Proxy Reconciler shall add comments to the transaction in WORKS to indicate the transaction is in dispute and the date reported to the bank.
- d. A dispute must be initiated with the bank within the first 60 days from the post date. With all disputes, contact the PCard Administrator for assistance;
- e. Upon resolution of the dispute, the Proxy Reconciler shall add comments in WORKS explaining the resolution of the dispute, then allocate and sign off the transaction.

## **SECTION 4. PROGRAM REVIEW AND COMPLIANCE**

### **4.1 Program Review**

The PCard Administrator will review various reports from WORKS on a monthly basis to ensure that PCard transactions appear within reasonable parameters. The primary purpose of these reviews is to ensure the program procedures and guidelines are being followed. Areas of interest include split transactions, over-limit purchases, unusual transaction patterns, and declined transactions. Commonly used reports include the following:

- a. Account Activity Reports - Such reports provide details on each transaction such as transaction date, merchant name, and dollar amount. The report can be used to sort

- transactions by dollar amount, merchant, date, or type and can be useful for identifying suspicious merchants, unusually high spending patterns and split transactions;
- b. Declined Transactions Report - This report identifies Cardholders who have attempted to use a card to make a purchase for which they are not authorized, that exceeds their single-purchase limits, that exceeds their monthly purchase limits, or from a merchant that has a blocked Merchant Category Code;
  - c. Disputes Report - This report identifies date, merchant, reason code, dollar amount and status of each dispute filed by a Cardholder. Reviewing the report would identify Cardholders with excessive disputes which could indicate that a Cardholder needs additional training or that he/she may be trying to disguise misuse or fraudulent activity.

The following analysis/reporting shall be performed by the PCard Administrator:

	CONTROLS	FREQUENCY
A	Monitor supplier spending exceeding \$25,000.00 annually	Annually
B	Card has not been used for over twelve (12) months	Monthly
C	Review list of separated employees from HR and verify card account has been deactivated	Bi-weekly
D	Split Transaction Audit Report	Monthly
E	Declined Transaction Report	Monthly
F	Federally and State debarred supplier report	Monthly
G	Random Department PCard audit	Quarterly
H	Monitor transactions above \$5,000.00 for Single/Sole Source purchases	Quarterly
I	Contact the merchant bank to verify of any new MCC Exclude Group templates	Annually

## 4.2 Compliance

- a. The PCard Administrator will routinely analyze electronic transaction data to ensure that purchasing policies and procedures are being followed;
- b. Every individual Cardholder is expected to strictly adhere to the policies and procedures governing the use of the PCard. Unauthorized card use or a failure to comply with the terms of the PCard Program and Agreement will be subject to any sanctions provided for in the County's Personnel Policy and in Section 2-26-21 of the Manatee County Code of Laws. Improper use of the PCard can be considered misappropriation of Manatee County's funds which may result in disciplinary action, up to and including, termination;
- c. Violations of policies and procedures governing use of the PCard, and the action taken is dependent upon the type of violation and the number of previous Cardholder violations. The Purchasing Official, through the PCard Administrator, can suspend a Cardholder's privileges; however, the department will be notified of any such action. All other actions are determined at the appropriate level. Any alleged violation or



- questionable transaction could result in an immediate suspension of card privileges pending a review to determine what, if any, action is appropriate;
- d. Cardholders, Proxy Reconcilers and Approvers shall sign an agreement to indicate they understand their role, and the related policies and procedures, and agree to comply with them;
  - e. The Purchasing Official and/or the Clerk of the Circuit Court may from time-to-time designate individuals to periodically conduct audits to ensure full compliance and that no violations of this procedure are occurring;
  - f. The PCard may be used only by the employee whose name is embossed on the card. No other person is authorized to use the card;
  - g. The PCard is to be used for County authorized purchases only. The PCard cannot be used for any personal use;
  - h. Participation in Manatee County's PCard Program is a convenience that carries responsibility along with it. Although the card is issued in a Cardholder's name, it is Manatee County Government's property and should be used with good judgment;
  - i. Improper use of the card can be considered misappropriation of Manatee County's funds which may result in disciplinary action, up to and including, termination;
  - j. The Department Director or designee will notify the PCard Administrator if a Cardholder abuses the program or violates the procedures;
  - k. If an abuse or violation has occurred, the PCard Administrator shall notify the Purchasing Official, the Department Director or designee, the Cardholder and the Proxy Reconciler and Accounts Payable Supervisor.

### 4.3 PCard Violations

- a. Minor violations are instances that are "accidental" and without willful intent. Examples include but are not limited to:
  - i. Using the wrong credit card when doing personal shopping and usually includes immediate discovery and notification to the PCard Administrator as well as restitution;
  - ii. Purchases with the card that should be made through the County's requisition system or some other means;
  - iii. Purchasing items from another County department which should be done through journal entry;
  - iv. Failure to obtain credit for Florida sales tax on purchase.
- b. Major violations are instances that show "willful intent" to disregard established policy and procedures. Examples include but are not limited to:
  - i. Purchasing unauthorized or restricted items
  - ii. Splitting orders to avoid the single transaction limit
  - iii. Allowing others to use the card
  - iv. Knowingly making personal purchases
  - v. Accumulating minor violations as defined above

#### 4.4 Violations and Consequences

Category		Violation	Consequences for Minor Violations
Minor	A	Gift cards (except where authorized by a Resolution of the Board of County Commissioners) greeting cards, flowers,	<p><b>First violation</b> has the following consequences: An email to the Cardholder notifying him/her of the infraction, and requesting a written response addressed to the PCard Administrator. The Cardholder's Proxy Reconciler, Approver, Supervisor, and AP Supervisor are to be copied on the email.</p> <p><b>Second violation</b> within a one-year period has the following consequences: An email to the Cardholder notifying him/her of the infraction, and requesting the Cardholder attend mandatory refresher training. The Cardholder's Proxy Reconciler, Approver, Supervisor, department Director and AP Supervisor are to be copied on the email.</p> <p><b>Third violation</b>, regardless of timeframe, has the following consequences: The immediate suspension of the Cardholder's PCard for one month. A formal suspension memorandum sent to the Cardholder, and copied to the Proxy Reconciler, Approver, Supervisor, department Director and AP Supervisor.</p>
	B	Manatee County building permits	
	C	Long Term rental or lease of land or buildings (must have prior approval of County Administrator or his/her designee)	
	D	Utilities, e.g., cell phones, water, sewer, etc.	
	E	Recurring charges, unless prior approval received from the PCard Administrator. Recurring refers to products or services that are scheduled (monthly, quarterly) as those should be placed on a purchase order	
	F	Automatic renewals	
	G	Use of discount travel companies (i.e., Travelocity, Expedia, etc.) for hotels and vehicle rentals	
	H	Booking accommodations using Airbnb	
	I	Payment of Florida sales tax	
	J	Back-ordered items	
	K	Lack of Documentation - Lack of adequate supporting documentation for any purchase. Transactions where the merchant does not provide documentation is not considered a violation if there is sufficient supporting	



		evidence to meet the requirements for substantiation.	
Category		Violation	Consequences for Major Violations
Major	L	Failure to notify the PCard Administrator within one (1) working day of discovering a card has been lost or stolen, or after discovering fraudulent activity	<b>First violation</b> has the following consequences: An email will be sent to the Cardholder and copied to the Proxy Reconciler, Approver, Supervisor, and AP Supervisor requesting the Cardholder to attend mandatory refresher training. Card will be suspended until Cardholder has attended the refresher training.
	M	Use of PCard by a person other than the one whose name is embossed on the card	
	N	Meals, food, alcoholic beverages or tobacco products (except where authorized by a Resolution of the Board of County Commissioners)	
	O	Keeping card information on file with a supplier unless approved by the PCard Administrator and the Purchasing Official	<b>Second violation</b> within a one-year period has the following consequences: The immediate suspension of the Cardholder's PCard for one month. A formal suspension memorandum sent to the Cardholder and copied to the Proxy Reconciler, Approver, AP Supervisor, and department Director
	P	Payment of tips / gratuity for food items that exceed 20% of the total amount of the meal. These types of charges are not allowed on PCards and are not reimbursable	
	Q	Failure to obtain approval from Purchasing Official prior to making purchases above single transaction limit (\$5,000.00)	
	R	Personal charges; any purchase that is not for use and ownership by Manatee County regardless of the intent to reimburse, or a purchase that lacks an appropriate business purpose	<b>Third violation</b> , regardless of timeframe, has the following consequences: A request sent from the PCard Administrator for the immediate surrender of the Cardholder's PCard. Immediate termination of the PCard and a formal termination memorandum from the PCard Administrator
	S	Split purchase. A split purchase is defined as one that is split into two or more transactions either by one or more Cardholders to circumvent the single purchase limit	

T	Unauthorized purchase. An unauthorized purchase is defined as one that does not relate to the mission of the requesting department or serve a public purpose, including advance payment unless specifically allowed via Commodities and Travel Expenses of this procedure	to the Cardholder informing them of current and past violations, and referencing training sessions, and corrective action plans that have been provided in the past. A copy of the termination memorandum sent to the Cardholder's supervisor, department Director, Proxy Reconciler, Approver and AP Supervisor. Suspension of the cardholder's eligibility to receive a PCard within 1 year of termination of PCard.
U	Failure to provide proper documentation to Finance by the 10th of the month following the billing cycle end	
V	Cash advances	
W	Non-business entertainment expenses	
X	Failure to obtain a valid and current certificate of insurance from supplier prior to the supplier performing services on County property	
Y	Any Combination 4th Violation	
Z	Other	Dependent on the degree of the violation

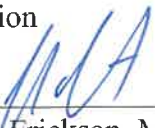
#### 4.5 Procedure for Handling Violations


- a. Violations of the PCard Program Procedures are reviewed and documented by the PCard Administrator and actions are dependent on the type of violation as listed in Section 4.4;
- b. A Cardholder's previous violations within the twelve-month period preceding the date of the violation under review, are considered when determining the action;
- c. The PCard Administrator reserves the right, dependent on the degree of the violation, to impose any of the actions listed in Section 4.4, upon approval from the Purchasing Official;
- d. At the direction of the Purchasing Official, the PCard Administrator has the authority to deactivate a card account until the completion of the review process;
- e. Each violation will be handled on a case-by-case basis and the outcome will be determined by the Purchasing Official with consultation from the PCard Administrator and may include the Chief Financial Officer, Cardholder Department Director, Human Resources Director and/or the County Administrator or designee, as needed;

- f. The Cardholder is notified via e-mail from the PCard Administrator of a transaction(s) that is under review;
- g. Cardholders may be required to provide additional information to determine if a violation occurred;
- h. If a violation has been identified and confirmed and authorization from the Purchasing Official has been obtained, the PCard Administrator will enact the appropriate consequence, notifying (at a minimum) the Cardholder, Proxy Reconciler, Approver, Department Director, Purchasing Official, AP Supervisor;
- i. In addition to the consequences listed in Section 4.4, the Department Director may impose further disciplinary action, up to and including termination, for violations of the PCard Program procedures, in accordance with the Manatee County Personnel Policy;
- j. Repeated offenders may be subject to additional consequences.

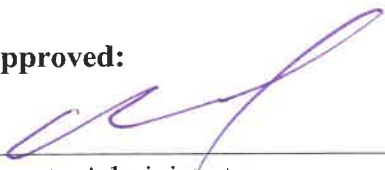
**ORIGINATOR, TITLE, AND DEPARTMENT NAME:**

Jacob Erickson, MBA, CPPO, NIGP-CPP, Purchasing Official, Financial Management / Procurement Division

  
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Financial Management Department  
Manatee County Government

  
\_\_\_\_\_  
Sheila McLean  
Chief Financial Officer  
Financial Management Department  
Manatee County Government

**Approved:**

  
\_\_\_\_\_  
County Administrator  
Manatee County Government

  
\_\_\_\_\_  
Date

**HISTORY:**

Modification of Title: R-01-36  
Modification of PCard Program dated 5/01/2001  
Amended: 07/28/2009  
Amended: 01/22/2014  
Revised: 05/01/2014  
Revised: 02/22/2016  
Revised: 03/25/2019  
Amended: 11/01/2023  
Revised: 02/23/2024

**FORMS:**

PCard Program Request Form  
Cardholder Agreement Form  
Proxy Reconciler and Approver Agreement Form  
PCard Missing Receipt Form  
PCard Limit Increase Form

**RELATED POLICY:**

Manatee County Per Diem and Travel Reimbursement  
Manatee County Procurement Ordinance – Chap 2-26  
Manatee County Procurement Administrative Standards and Procedures

**DATE ISSUED/SUNSET DATE:**

Issue Date: 2/23/2024

Sunset Date: 10/31/2028