



COUNTY OF SANTA CLARA

PROCUREMENT CARD (P-CARD) POLICY



PROCUREMENT DEPARTMENT

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County of Santa Clara

Procurement Card (P-Card) Policy

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County of Santa Clara

Procurement Card (P-Card) Policy

I. Program Overview

The County of Santa Clara (County) Procurement Card (P-Card) is a charge card designed to enable designated permanent full-time and half-time County employees to make authorized small dollar purchases of supplies, materials, equipment, and services for County business not exceeding \$5,000 per transaction. The program streamlines payments by eliminating the administrative burden and costs associated with traditional methods of payment.

The County has elected to participate in the State of California's CAL-Card Program as the means of implementing our P-Card Program. The State of California has awarded a contract to the U.S. Bank (Bank) under the CAL-Card Program. The P-Card can only be used for official County business and must be surrendered upon termination of employment for any reason or upon demand by the County.

As a charter County under the State of California, authority to procure goods and services with public funds is held by the County Purchasing Agent, i.e., the Director of Procurement, as prescribed in the Purchasing Ordinance. The P-Card Program is based on the Purchasing Agent's delegation of limited purchasing authority to properly trained employees. This authority may not be reassigned. Thus, a P-Card may not be re-assigned, or passed to another to make purchases.

All P-Card participants are required to use the Access Online system provided by the Bank for monthly billing statement reconciliation and reports.

II. General Information

A. Eligible Employees

P-Card responsibilities will be assigned to regular County employees only. Based on legal liability concerns and since County personnel have no direct supervisory or disciplinary authority over contractor employees, P-Card responsibilities will not be assigned to non-County employees, including retirees. Additionally, P-Card responsibilities should not be assigned to part-time or temporary employees.

B. First Purchasing Option

The P-Card should be used as the first option, before other methods to obtain and pay for authorized supplies and services costing \$5,000 or less, including tax and shipping charges. If the use of the P-Card is not possible, such as when the supplier will not accept credit cards and no other supplier could be located, then a Field Purchase Order shall be issued by the department.

C. Competition

All Cardholders are encouraged to compete their purchases by obtaining more than one quote whenever possible. Cardholders are required to obtain quotes to show that the price paid is fair and reasonable. Departments are required to notify the P-Card Administrator for a commodity or service that will exceed more than \$25,000 from the same supplier in one fiscal year, so that the Procurement Department can review the item for possible competition and establishment of a contract to support a competitive purchase.

Bonafide Suppliers Only. P-Card suppliers must be established, reputable, reliable retailers with appropriate licenses, etc., and not those of a questionable status. Do not make P-Card purchases from such sources as:

- Ebay (auctions)
- Swap meet vendors
- Street market vendors
- Adult book stores
- Pawn shops
- Craigslist

- Your relatives, neighbors, friends, etc.

The following stores consistently offer fair and reasonable pricing and are sufficiently competitive with each other across similar lines of merchandise. The chains are:

Lowes	Home Depot	Orchard Supply
Ace/True Value Hardware	Fry's Electronics	Costco (on-line purchases)
Target	Wal-Mart	

D. Public Funds

Since the P-Card purchases represent public funds, Cardholders and their Approving Officials must be continually reminded that their purchases represent the County's interest and reputation for ethical and prudent dealings. Each transaction must be one that the Cardholder and Approving Official could easily explain or defend as prudent use of public funds, since all transactions are a matter of public record accessible to scrutiny from all members of the public and the media. Additionally, written policies cannot be established to cover every eventuality of P-Card use. All program participants must use their best judgment when expending public funds with a County P-Card.

All funding received by the County, regardless of source, is subject to the same standard procurement guidelines including those in this P-Card Policy and P-Card Procedure Manual. This complies with state and federal policies that local governments have jurisdiction and control over all funds received. Therefore state and federal grant funds must be managed and expended in accordance with County rules and regulations.

E. Use of the P-Card for Personal Purchases Prohibited

Under no circumstances is a Cardholder permitted to use the P-Card for personal purchases. Using the P-Card for personal purchases may result in disciplinary action, up to and including termination. Criminal penalties may also apply. Cardholders will be required to attend mandatory training and execute the Cardholder Acknowledgement Disclosure Form prior to the issuance of the P-Card for County use.

III. Countywide Program Administration

A. County P-Card Policy and P-Card Procedure Manual

The Procurement Department administers the P-Card Program with U.S. Bank at a County level. In this capacity, the Procurement Department personnel serve as resources for all program users in the area of policy development and implementation, day-to-day administration of the program at a countywide level, audit, and training.

The County has developed this P-Card Policy and a P-Card Procedure Manual to establish minimum standards for the use of the P-Card in order to ensure compliance with all applicable laws and policies related to procurement. The version of the policy and procedure manual posted on the Procurement intranet site will always be the official policy and procedures governing the P-Card Program. The effective date of the P-Card Policy and P-Card Procedure Manual will be in the footer of the document. The Procurement Department will maintain an archive of previous versions of the policy and procedures, which will be available upon request should the need arise.

B. P-Card Program Administration

The County P-Card Program is administered by the Procurement Department and the County P-Card Administrator is the Director of Procurement, or her designee. The County P-Card Program Administrator is responsible for administering the P-Card Program at the County level. Responsibilities of the P-Card Administrator include:

- Develop the County P-Card Policy and P-Card Procedure Manual.
- Review the policy and procedures at least annually to ensure that it is in keeping with “best practices” in the purchasing card industry and that it allows participants in the program to utilize the P-Card to its utmost advantage in the procurement process within sufficient control guidelines.
- Work with other divisions of the Procurement Department and with Program users to determine new ways that the P-Card can be used within legal and policy requirements.
- Serve as a central point of contact on all issues of policy and procedures. This position is the official liaison between the Bank and all P-Card participants.
- Communicate all P-Card Program policy and procedural changes to the users.
- Develop and maintain Countywide P-Card forms.

- Setup agency and departmental Level 4 accounts and maintain account profile changes for Agency Program Coordinators, Approving Officials, Cardholders and Billing Officials.
- Provide assistance to customers.
- Establish and make approved changes to dollar limits for all P-Cards.
- Review monthly and quarterly reports for compliance with policies and procedures.
- Facilitate training for all participants in the Program. Establish and maintain records for all training provided.
- Manage the relationship with U.S. Bank.
- Establish department and countywide reporting of data and card usage, as well as determine trends in spending and suppliers used.
- Perform audit reviews of the program participants to ensure compliance with P-Card Policy and P-Card Procedures.
- Ensure prompt payment is made to the Bank in order to take advantage of the State of California Prompt Payment Rebate Incentive.
- Review renewal information for all accounts nearing expiration to ensure cards are received prior to the end of the expiration month.
- Develop and maintain county-wide training materials and handouts.
- Maintain records in accordance to the records retention schedule.

C. Process Improvements and Audits

The P-Card Administrator and the Controller's Office Claims Unit conducts periodic reviews of the Program. Reviews take a risk-based approach and focus on the level of compliance with P-Card Policy and P-Card Procedures, and evaluation of internal controls. The audit report provides an assessment of the use of the Program, makes recommendations for improvement when warranted, and works with the Program participants to implement action plans to make corrections or other improvements to the Program.

D. Training

The P-Card Program Administrator will develop and deliver training on the P-Card Program to all Agency Program Coordinators, Approving Officials and Cardholders. The Controller's Office will provide training to the Billing Officials. The Bank is

responsible for the implementation and initial training on the Access Online system for the County P-Card Administrator. The P-Card Administrator will provide additional training in the system as needed.

IV. Agency/Department Roles and Responsibilities

A. Agency Enrollment Requirement

The agency/department can apply for participation in the County P-Card Program by submitting an Agency Request to Participate and Statement of Responsibility Form to the P-Card Administrator. This form must be executed by the agency or department head.

B. Participating Agency Structure

The agency personnel who will perform critical P-Card administrative functions are designated as follows:

The **Agency Program Coordinator** oversees the P-Card Program at the agency/department level.

Approving Officials (usually Cardholders' direct supervisors or managers) are responsible for requesting cards for staff and submitting them to the Agency Program Coordinator; for reviewing and approving transactions in Access Online under their supervision, at the end of each monthly billing cycle. Approving Officials are responsible for approving payment as delegated by the County Controller-Treasurer and for ensuring that all the Cardholders' reconciled monthly statements are accounted for and submitted to the Billing Official within twenty-one (21) calendar days of the statement date.

Cardholders are current County employees with procurement authority who use the P-Card for business related purchases. Cardholders are responsible for reconciling and reallocating their transactions in Access Online and submitting their Statement of Account at the end of each billing cycle with supporting sales receipts and auditable documentation. Cardholders are responsible for submitting statements along with their supporting documentation to the Approving Official within fifteen (15) calendar days of the statement date.

Billing Officials are accounting staff in the departments who perform accounting entries and transactions. Billing Officials are responsible for auditing the transactions

reports by the Cardholder and approved by the Approving Officials. Billing Officials are responsible for the reconciliation and reclassification of the expenditures to the proper account in Access Online, within thirty (30) days of the statement date and also ensure the accrual of the use tax for purchases where sales tax has not been paid.

C. Agency Program Coordinator Responsibilities

The Agency Program Coordinator is appointed by the department head or agency director to administer the P-Card Program within their respective agency or department. The Primary Contact Set-Up Form from the agency or department will designate the Agency Program Coordinator and must be sent to the P-Card Administrator through the on-line help desk tlc@isd.sccgov.org.

The Agency Program Coordinator is responsible for administering the P-Card Program at the agency or department level. The responsibilities of the Agency Program Coordinator include:

- Attend the mandatory training provided by the P-Card Administrator.
- Be proficient with the P-Card Policy and P-Card Procedure Manual and ensure compliance at the department level.
- Coordinate, prepare and approve the appropriate P-Card forms for new cards, replacements, account changes, card cancellations and forward these requests to the P-Card Administrator.
- Be proficient with the Access Online system and utilize the reports available for departmental P-Card use and performance.
- Develop internal procedures specific to their respective departments and disseminate the written procedures for requesting P-Cards and approving Cardholders.
- Provide guidance to the department management to establish P-Cards for appropriate staff in the department who are responsible for making small dollar purchases.
- Work with department management to determine appropriate spending limits for Cardholders and provide customer support for the Approving Officials to set up accounts for Cardholders.
- Ensure that the department has sufficiently documented internal controls and other measures to prevent and/or detect misuse or fraudulent use of the P-Card.

- Ensure all P-Card participants attend the mandatory training provided by the P-Card Administrator.
- Ensure program compliance related to internal controls, spending limits, splitting purchases and records retention requirements.
- Immediately report any misuse by the P-Card participants to the P-Card Administrator.

D. Approving Official Responsibilities

The Approving Official is the individual designated by the agency or department to request cards for staff, approve Cardholder purchases and verify that purchases are made for official County business. Approving Officials responsible for reviewing Cardholder transactions must have a thorough knowledge of the job responsibilities of the Cardholder under their supervision in order to determine if purchases are reasonable in terms of the types of purchases made.

Approving Officials responsibilities include:

- Attend mandatory training provided by the P-Card Administrator.
- Be proficient with the P-Card Policy and P-Card Procedures Manual.
- Maintain knowledge of the P-Card Program and department internal procedures on the use of P-Card issued by the Agency Program Coordinator.
- Request P-Cards for employees under their supervision by completing the appropriate account set-up and update forms as required.
- Notify the Agency Program Coordinator when the Cardholder resigns, transfers, or is terminated from employment.
- Ensure P-Cards issued under their authority are properly utilized.
- Immediately inform the Agency Program Coordinator if Cardholder has misused the card for personal use.
- Ensure that reconciled statements, associated receipts, credit slips, and all appropriate documentation are received for each Cardholder account.
- Review and certify the reconciled Cardholder Statements of Account are in accordance with the P-Card Policy and procedures, and ensure that receipts and documents are in order.
- Review and approve Cardholder transactions in Access Online system.

- Ensure that each Cardholder Statement of Account is accounted for and forward them to the Billing Official within twenty one (21) calendar days of statement date.

E. Cardholder Responsibilities

All Cardholders are de facto purchasing agents for the County of Santa Clara. Accordingly, the Cardholders must have a minimum understanding of the public purchasing rules and regulations. Cardholders are appointed by their Approving Officials to make small dollar purchases of goods and services for their department.

Cardholder responsibilities include:

- Attend mandatory P-Card training provided by the P-Card Administrator.
- Be proficient with the P-Card Policy and P-Card Procedure Manual.
- Maintain knowledge of the P-Card Program and department internal procedures on the use of P-Card issued by the Agency Program Coordinator.
- Sign the Cardholder Acknowledge Disclosure Form provided by the P-Card Administrator.
- Activate card following the procedures provided during the training.
- Maintain security of the account number and credit card, expiration date and security code at all times.
- Know their respective Single Transaction and Cycle Credit Limit or 30 Day Monthly Transaction limits.
- Ensure all purchases are allowable purchases according to the County P-Card Program and department internal procedures.
- Obtain best value for the County when making purchases with the P-Card.
- Obtain a receipt at the point of purchase and verify for accuracy.
- Maintain all documentation required by the County P-Card Program and internal procedures.
- Call the Bank Customer Service to report lost or stolen cards immediately and notify your Approving Official.
- Report fraud activity to the Bank immediately and then notify your Approving Official.
- Reconcile all the transactions and forward to the Approving Official for approval in Access Online system.

- If there are any disputed charges on the statement that could not be resolved with the merchant, contact the Bank via Access Online system within 60 calendar days of the transaction date.
- Submit the reconciled statement, purchasing documentation and all associated receipts to your Approving Official within fifteen (15) days from the statement date to ensure timely reclassification of charges to the different General Ledger (GL) accounts and Cost Centers.
- Inform Approving Official of any account profile changes like changes to last name, address, telephone number, etc.
- Cardholder shall not do the following:
 - Use the P-Card for personal use;
 - Allow family members or other staff members to use the card;
 - Split transactions to circumvent spending limits;
 - Make unauthorized purchases.

F. Billing Official Responsibilities

The Billing Official is responsible for reconciling and reclassifying expenditures to proper Cost Centers, Fund Number and General Ledger account including the WBS and Order number as needed.

Billing Official Responsibilities include:

- Attend the mandatory training provided by the Controller's Office.
- Be proficient with the P-Card Policy and P-Card Procedures Manual.
- Maintain knowledge of the P-Card Program and department internal procedures on the use of P-Card issued by the Agency Program Coordinator.
- Process all invoices for program compliance for their respective agency or department as assigned.
- Audit the transactions reported by the Cardholders and approved by the Approving Officials.
- Reconcile Managing Account Statement total with payments posted to the department's default Cost Center and conduct appropriate research to resolve any discrepancies.
- Verify that the P-Card transactions have been reclassified with proper accounting attributes and receipts have been submitted for all amounts charged.

- Determine whether proper sales tax has been paid and accrue any use tax.
- Process final approval for reclassification entries in Access Online system within 30 calendar days of statement date, with the exception during fiscal year end when specific deadlines are posted.
- Provide assistance for document request from Procurement Department and the Controller-Treasurer Department.
- Maintain records in accordance to the records retention requirements.

V. Use of the Card

This section establishes the appropriate and inappropriate use of the P-Card. All purchases made with the P-Card must be for official County business. Internal department policies governing use of the card can be more, but not less restrictive than the County P-Card Policy.

Only the employee, whose name appears on the face of the P-Card, is authorized to initiate transactions with the card. Use of the P-Card by any other person is considered misuse of the card, even if the purchase is for legitimate County business.

A. Allowable Purchases

The P-Card can be used for small dollar purchases of supplies, materials, equipment, services and travel related services unless otherwise prohibited or restricted. All purchases must be within cardholders' spending limits. Any single or monthly transaction limits of more than \$5,000 and \$25,000 respectively must receive prior written approval from the P-Card Program Administrator, using the 'Authorization to Increase above County Limits' Form.

Allowable purchases are:

1. Advertising, in any media, for the recruitment of personnel, volunteers, and foster parents.
2. Goods/products and consumables that are not covered by a contract award established by the Procurement Department.
3. Books, periodicals, magazines and subscriptions in paper, online or electronic format with publishers, distributors and vendors.
4. Educational course materials.
5. Facility and facility- related expenses.
6. Equipment rental- rental period may not exceed 30 calendar days.
7. Expenses incurred for vehicle rental, meals and lodging in conjunction with business travel in accordance with County Travel Policy.
8. Fuel charges for rented vehicles.
9. Ground transportation such as train, taxi services.
10. Airline related expenses, e.g. baggage check-in fees, purchase of in-flight meals.
11. Fees for participation in fairs and exhibition.
12. Registration for conferences.

13. Membership fees.
14. Expenses incurred for meals and lodging in conjunction with professional development programs.
15. Election expenses.
16. Postage.
17. Emergency purchases during an emergency as defined by the California Government Code and the County Ordinance.
18. Services provided by a California vendor. For onsite services, vendor is required to sign the Hold Harmless Agreement before providing services.

B. Excluded/Restricted Purchases

The following types of purchases are strictly prohibited by the P-Card policy. No exceptions will be granted:

Excluded Purchases

1. Personal purchases of any kind (Personal purchases are defined as purchases of goods or services intended for non-work related use or use other than for official County business.)
2. Donations or gifts to a charity or a gift to an entity.
3. Fuel for personal cars since the personal vehicle expenses will be compensated through mileage reimbursement.
4. Gift cards, stored value cards, calling cards, pre-paid cards or similar products.
5. Entertainment, including in-room movies.
6. Alcoholic beverages.
7. Tobacco products.
8. Weapons, and related accessories, side arms and bullets even if these are for training purposes.
9. Fastrak toll tags or transponders for employees' personal vehicle.
10. Individual sized bottled water for non-emergency situations.
11. Services provided by a non-California vendor.

The following types of purchases are restricted by the P-Card policy. No exceptions will be granted unless otherwise indicated:

Restricted Purchases

1. Goods that is available for purchase on a current County contract.
2. Airline tickets except if a ticket is lost immediately prior to or during a trip; the traveler should first seek direct assistance from the airline. In this situation, it may be necessary for the traveler to pay or use the P-Card for replacement tickets, including administrative fees and a higher airfare charge. Upon return, the County may approve reimbursement of the replaced ticket expense. When seeking assistance, the traveler should also inquire with the airline about filing a lost ticket reimbursement claim. The claim should be submitted listing the County as claimant. If a County P-Card is used, reimbursement to the employee would not be necessary, but the reimbursement claim should still be filed on behalf of the County. If unsuccessful in recovering the cost from the airline, the Travel Coordinator should contact ESA Insurance at 441-4340.
3. Fuel for County vehicles as Fleet Management requires the use of the fuel credit card for this purpose.
4. Travel expense, lodging, meals, or meals for persons providing services without compensation.
5. Rental of Equipment exceeding 30 calendar days.
6. Fixed Asset Computers.
7. Fixed Asset equipment.
8. Hazardous Materials/ Removal of Hazardous Materials.
9. Chemicals.
10. Individual sized bottled water.

C. Purchase of Restricted Items

Items that are on contract established by the Procurement Department are restricted for purchase with the P-Card. If the Cardholder has a valid business reason to use the P-Card to purchase restricted products, the Cardholder must obtain a written waiver from their department or agency head before they can make the purchase. Reasons for purchasing a restricted/excluded product may include:

- Contracted vendor's pricing is above what is available in the open market and the vendor will not match the lower price;
- Contracted vendor does not have the required product in stock;

- Department is not listed as an authorized user of the master contract and does not have an ongoing need that warrants an amendment to the contract.
- Required brand/model is not available on contract.

When requesting approval from the agency or department head, cardholder is required to attach all supporting documentation justifying the use of the P-Card from the purchase of the restricted product. This would include written communication from contracted vendor that they cannot match their competitor's price or the unavailability of the product.

When an exemption is provided by the agency or department head, Cardholder must attach the form along with the supporting documentation to the Statement of Account and the original receipts.

Declared Emergencies and Natural Disasters

The Director of Procurement has the authority to raise the Single Transaction Limit and Monthly Transaction Limit to any amount deemed necessary to mitigate any declared emergencies or natural disasters as defined by the California Government Code and the County Ordinance Code. The Director of Procurement grants authority to forego standard procurement requirements for needs arising from unforeseen causes. In cases involving the welfare of the general public, extreme weather conditions, or official declared emergencies, staff assigned to emergency operations are allowed to obtain after-the-fact approval for exceptions. Documentation for transactions must follow the guidelines established for the Office of Emergency Services.

VI. Program Compliance

A. Internal Controls

Internal controls must include:

- Appropriate separation of duties between making transactions (Cardholders), review and approval transactions for payment (Approving Officials), and payment of the monthly billing statement (Billing Official). Inverted reciprocal approvals will be permitted by the County P-Card Administrator only when there are no options such as when a department is so small that it is necessary. Such approvals must be audited more regularly.
- Appropriate hierarchical review and approval of purchases by someone with supervisory authority over the Cardholder and/or with authority to question purchases if needed.
- Appropriate limits on the number of Cardholders assigned to a supervisor or Approving Official in order to ensure adequate review of business need and documentation.
- Provision for an annual independent audit or review of the P-Card Program by the P-Card Administrator or Controller's Office Claims Unit. Reviews must address:
 - Adequacy of internal policies and procedures;
 - Appropriateness of Cardholder spending limits;
 - Adequacy of review, reconciliation, and payment procedures; and
 - Adequacy of documentation for transactions.

B. Cardholder Spending Limits

Spending limits enable management to provide Cardholders with the purchasing power to accomplish the needs of the job without exposing the County to unnecessary risk. Spending limits should be based on job responsibilities of the Cardholder and/or the job title. Cardholder spending limits must be reviewed at least annually to determine that actual usage is consistent with spending limits.

There are two types of spending limits in the P-Card Program. Single Transaction Limit is a mandatory spending limit imposed on each Cardholder account. Cycle Credit

Limit or 30 Day Limit is a mandatory spending limit that restricts the amount of purchases a Cardholder can make in one billing cycle.

Single Transaction Limit for the County is \$5,000. The Approving Official and Agency Program Coordinator can establish individual spending limits less than \$5,000, as determined by overall procurement and card program goals.

The P-Card Administrator can grant approval for individual limits greater than \$5,000 upon a valid request from the Agency Program Coordinator. Agency Program Coordinators must request prior, written approval from the County P-Card Administrator for individual or blanket transactions over the single transaction limit. The P-Card Administrator shall evaluate the situation and approve or deny the request and provide an explanation for her decision to the Agency Program Coordinator.

The Cycle Credit Limit or 30 Day Limit for the County is \$25,000. A Cardholder's cycle limit cannot be more than \$25,000 without prior, written approval from the P-Card Administrator.

The Director of Procurement has the authority to raise the single transaction limit and cycle credit or 30 day limit to any amount deemed appropriate, under the circumstances of the transaction, in order to improve the business practices associated with the use of the P-Card in order to achieve maximum savings to the County and when an emergency is declared in accordance to the County Ordinance to mitigate the emergency.

C. Splitting Purchases

Any requirement over \$5,000 must be submitted to the Procurement Department via a requisition for competitive procurement. Attempting to split the purchase into two or more transactions to circumvent the \$5,000 or a Cardholder respective single transaction limit is strictly forbidden since it violates the guidelines for competitive procurement. The intent of the P-Card Program is to provide for straightforward one-for-one transactions – one product or list of products and one receipt or invoice at the time of purchase.

Examples of splitting a transaction:

- Purchasing an item costing \$7,000 and having it rung up in two installments of \$3,500 each.
- Splitting a list of varied items from one supplier costing over \$5,000 into two or more lists each costing less than \$5,000.
- Buying the same items from one or more suppliers with a combined total exceeding \$5,000.
- Splitting a transaction to circumvent the assigned single transaction limit.

D. Card Issuance Requirements

- Issuance is limited to one P-Card per Cardholder by department. Exceptions are provided to personnel who are assigned to purchase supplies in the Supply Unit in the Logistics Section for Disaster Service Preparedness.
- Cardholders must be full-time County employees. Cards will not be issued to part-time employees, temporary workers, or contractors.
- Cards will not be issued in the name of a department or work unit to be shared by multiple employees.
- Cards cannot be issued to employees of foundations associated with the County.
- All training requirements as described in the P-Card Policy and P-Card Procedure Manual must be met before an employee receives the P-Card for County use.

VII. Legal Issues

A. Failure to Comply with Laws, Policies and Procedures

Cardholders and Approving Officials who knowingly, or through willful neglect, fail to comply with the following may be subject to disciplinary action, up to and including termination. Criminal penalties may apply.

- P-Card Policy and P-Card Procedure Manual;
- Internal department policies and procedures governing procurement and the P-Card Program.

The P-Card Administrator reserves the right to withdraw any authority or delegated approval due to non-compliance with applicable rules, regulations, policies and procedures, or the terms of any conditional approval.

B. Payment of California Sales and Use Tax

The Billing Official must ensure to accrue the California sales and use tax when appropriate if the merchant has not charged such tax on the invoice or receipt.

C. Records Retention Requirements

The Procurement Department and the Controller-Treasure maintain the Records Retention Schedules for the procurement and accounting records for the County. The P-Card Program records shall be maintained accordingly.

- Documents related to transactions are accounting records and must be maintained according to the requirements of the Accounts Payable files.
- Documents related to the issuance of cards to employees are accounting records and must be maintained according to the P-Card Program Administration records.