

INTEROFFICE MEMORANDUM



TO: Anthony Nicks, County Auditor

FROM: Felicia Strong-Whitaker, Director *FSW*
Department of Purchasing & Contract Compliance

DATE: August 31, 2026

SUBJECT: Purchase Card Program Follow-Up Audit, August 10, 2026

Thank you for the opportunity to review and respond to the Purchase Card Program Audit for the period of January 1, 2025 – December 31, 2025.

OVERVIEW

The Purchasing Card Program is comprised of the Purchasing Card (P-Card) and Travel Card (T-Card) and is the only charge/credit card program authorized for use by the County's governing authority, the Fulton County Board of Commissioners. The County utilizes the Bank of America Works® System ("Works®"), a web-based application that automates the existing processes for purchasing goods and reconciliation of the purchasing card accounts; provides real-time purchasing card administration; purchase request approval workflow; and, a post-purchase reconciliation process that adheres to the County's existing payment process workflow and internal purchasing policies.

Once the User Department uses the card and completes a card transaction, the reconciliation process verifies that the purchase is in compliance with all established policies and procedures. If the purchase is determined to be non-compliant, the Department of Purchasing & Contract Compliance ("Purchasing") will issue a non-compliance notification to the User Department regarding the policy violation and the consequence of that violation based upon whether it is the first, second or third offense.

FINDINGS AND RECOMMENDATIONS

The Department of Purchasing & Contract Compliance has reviewed the findings and recommendations, and our responses are provided below:

Finding 1 - Prohibited Purchases

Purchasing Response:

The Department of Purchasing & Contract Compliance has initiated measures to identify prohibited purchases, and those efforts have resulted in consistent enforcement and reduced oversight. The following mechanisms are readily available throughout the year to all County staff to reinforce policy guidelines:

- 1) The Purchasing Card Program Manual ("P-Card Manual") is available to all County employees via the Employee Intranet;
- 2) Annual P-Card Refresher training where this information is provided;
- 3) Quarterly training is provided if any County employee requires additional training;
- 4) The P-Card Program Administrator and P-Card Coordinator are available to answer any questions or concerns a Cardholder may have regarding a purchase.

Purchasing will provide additional training to assist staff in identifying prohibited purchases.

Finding 2 - Split Purchases

Purchasing Response:

Purchasing concurs with the recommendation to reinforce policy guidelines throughout the year and to strengthen Purchasing's review procedures to ensure consistent identification of split transactions posted in Works®.

Finding 3 - Untimely Payment of Invoices

Purchasing Response:

Enforcement of policy for payment of older invoices and / or invoices dated over 90 days old on the departmental purchasing card were followed for 4 of the 6 findings.

For TXN00185507 and TXN00193774, purchases were allowable and made within the allowable timeframe. For TXN00188747 and TXN00193285, non-compliance memos were uploaded for payment of invoice dated over 90 days old.

The P-Card Manual currently addresses late payment of invoices including guidance on non-compliance with penalties. Purchasing will update the P-Card Manual to provide more specificity regarding the number of days an invoice can/cannot be paid utilizing the P-Card.

Finding 4 – Untimely Transaction Sign Off

Purchasing Response:

Purchasing currently has mechanisms in place to monitor sign-off actions for all transactions. A specific calendar is developed each year as guideline for the approval processes which includes all parties who have sign-off responsibility: Cardholder (User Department), APR (Purchasing) and ACT (Accounts Payable), see Attachment 1, 2025, P-Card Delivery Schedule. Purchasing will revise the language in the P-Card Manual to include the calendar with the specific dates moving forward.

Finding 5 - Payment of Sales Tax

Purchasing Response:

The P-Card Manual includes instructions to the Cardholder to follow when sales tax is charged by a merchant/vendor. Purchasing cannot prohibit sales tax from being charged at the point of sale, but have established procedures, currently in place, to reverse or address sales tax that may be inadvertently charged to a card account. The information is also provided annually in the Purchasing Card Refresher Training as well as the Purchasing Card Administrator provides monthly reminders that highlight policies and procedures.

Finding - 6 Incorrect Object Code for Purchase

Purchasing Response:

Purchasing concurs with the recommendation. Additional training will be provided to ensure correct object codes are reviewed and approved during the reconciliation process.

Finding 7 - Non-Compliance with Mandatory P-Card User Training

Purchasing Response:

Several cardholders attended one-on-one training with the P-Card Administrator. One cardholder retired before annual refresher training, see Attachment 2.

Currently, the P-Card and T-Card Annual Refresher training are held annually and addressed in one refresher course. Many P-Cardholders, that are not also T-Cardholders, will exit from the training

when the training does not apply to them. Purchasing will work with Finance to separate the P-Card and T-Card Refresher training to reduce drop-off attendance during the combined training. Purchasing will also work with Information Technology to research options for training sessions to be delivered electronically in a format with the capability to track and validate trainee participation and attendance.

Concern 1 - Data Security Lapse

Purchasing Response:

Purchasing concurs with the recommendation and will review our current practice regarding the security concerns identified with the Office of the County Attorney and Information Technology.

Concern - 2 Enhancement of Hospitality Expense Documentation

Purchasing Response:

Purchasing does not concur with this recommendation. During the reconciliation process, Purchasing ensures that the pre-approved Hospitality Form E is uploaded with the required attachments per Form E and that Form E has the required approval signatures. Form E currently states, "Upon request for payment, the following information must be submitted with Form E: itemized invoice identifying the name of the establishment, description of purchase or service, and cost. In addition, the specific business purpose/justification of the meeting or event including the names of all attendees and a copy of the meeting agenda must be attached."

Purchasing will continue to enforce the current requirements.

Concern 3 - Goods Shipped to Private Residence

Purchasing Response:

Purchasing concurs with the recommendation and will update the P-Card Manual to prohibit the delivery of purchases using the County's P-Card to private residences and that all purchases must be delivered to a County address for verification of receipt purposes.

cc: Sharon Whitmore, CFO

2025 Extended PCard Delivery Schedule - APR and ACT

PCard Cycle End Date	Earliest Date the Dept to Run Statement *pull final statement after the cycle ends	AH Reconciliation Sign-off Approval due to Purchasing (Five to Seven Days from Statement)	P-Card Cutoff Date	Purchasing Review Dates (est. Ten Days)	APR Approvals for P-Card Due to Fiance Account Payables	AP Review Date Range (Three Days)	IT loading WORKS into AMS (Two Days)	Pre-Payment Date to Bank	Check Run Date and posting against the budget	Update P-Card & T-Card Spreadsheet	Receive Payment Registers	BSA (Date of Chargebacks to BSA)
January 25, 2025	January 27, 2025	Monday, February 3rd	2/4/2025	2/4/2025-2/14/2025	Friday, February 14, 2025	02/17/2025-02/19/2025	02/20/2025-02/21/2025	2/17/2025	2/26/2025	2/27/2025	2/27/2025	3/3/2025
February 25, 2025	February 26, 2025	Tuesday, March 4 th	3/5/2025	3/5/2025-3/14/2025	Friday, March 14, 2025	03/17/2025-03/19/2025	03/20/2025-03/21/2025	3/17/2025	3/26/2025	3/27/2025	3/27/2025	4/1/2025
March 25, 2025	March 26, 2025	Tuesday, April 1 st	4/2/2025	4/2/2025-4/11/2025	Friday, April 11, 2025	04/14/2025-04/16/2025	04/17/2025-04/18/2025	4/16/2025	4/23/2025	4/24/2025	4/24/2025	4/29/2025
April 25, 2025	April 28, 2025	Friday, May 2 nd	5/5/2025	5/3/2025-5/13/2025	Tuesday, May 13, 2025	05/14/2025-05/16/2025	05/19/2025-05/20/2025	5/16/2025	5/23/2025	5/27/2025	5/27/2025	5/30/2025
May 25, 2025	May 26, 2025	Monday, June 2 nd	6/3/2025	6/3/2025-6/13/2025	Friday, June 13, 2025	06/16/2025-06/18/2025	06/20/2025-06/23/2025	6/16/2025	6/25/2025	6/26/2025	6/26/2025	6/30/2025
June 25, 2025	June 26, 2025	Wednesday, July 2 nd	7/3/2025	7/3/2025-7/14/2025	Monday, July 14, 2025	07/15/2025-07/17/2025	07/18/2025-07/21/2025	7/16/2025	7/23/2025	7/24/2025	7/24/2025	7/29/2025
July 25, 2025	July 28, 2025	Friday, August 1 st	8/4/2025	8/2/2025-8/12/2025	Tuesday, August 12, 2025	08/13/2025-08/15/2025	08/18/2025-8/19/2025	8/15/2025	8/22/2025	8/25/2025	8/25/2025	8/28/2025
August 25, 2025	August 26, 2025	Tuesday, September 2 nd	9/3/2025	9/3/2025-9/12/2025	Friday, September 12, 2025	09/15/2025-09/17/2025	09/18/2025-09/19/2025	9/16/2025	9/22/2025	9/23/2025	9/23/2025	9/26/2025
September 25, 2025	September 26, 2025	Thursday, October 2 nd	10/3/2025	10/3/2025-10/13/2025	Monday, October 13, 2025	10/14/2025-10/16/2025	10/17/2025-10/20/2025	10/16/2025	10/22/2025	10/23/2025	10/23/2025	10/27/2025
October 25, 2025	October 27, 2025	Monday, November 3 rd	11/4/2025	11/4/2025-11/14/2025	Friday, November 14, 2025	11/17/2025-11/19/2025	11/20/2025-11/21/2025	11/14/2025	11/24/2025	11/25/2025	11/25/2025	12/1/2025
November 25, 2025	November 26, 2025	Tuesday, December 2 nd	12/3/2025	12/3/2025-12/12/2025*	Friday, December 12, 2025	12/15/2025-12/17/2025	12/18/2025-12/19/2025	12/16/2025	12/22/2025	12/23/2025	12/23/2025	12/29/2025
December 25, 2025	December 26, 2025	Friday, January 2 nd , 2026	1/5/2026	1/3/2026-1/13/2026*	Tuesday, January 13, 2026	01/14/2026-01/16/2026	01/20/2026-01/21/2026	1/16/2026	1/23/2026	1/26/2026	1/26/2026	1/30/2026

* Please notes that these dates for November and December may be adjusted pending the go live date for 4X.

Note the dates in red are for the Yearend cut off dates

Approved P-Card Extension for specific departments