



## NEBRASKA AUDITOR OF PUBLIC ACCOUNTS

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November 27, 2017

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Dear Sirs and Madams:

This letter is provided pursuant to AICPA Auditing Standards AU-C Section 265, which permits the early communication of audit findings due to their significance and the need for corrective action. The work addressed herein was performed as part of the fiscal year 2017 Comprehensive Annual Financial Report (CAFR) audit. This communication is based on our audit procedures and related activity through June 30, 2017. Because we have not completed our audit of the fiscal year 2017 CAFR, additional matters may be identified and communicated in our final reports.

In planning and performing our audits of the State's financial statements, the Auditor of Public Accounts (APA) considered the State's internal control over financial reporting (internal control) as a basis for designing the audit procedures. The audit procedures selected were utilized for the purpose of expressing our opinions on the financial statements of the State, but not for the purpose of expressing an opinion on the effectiveness of the State's internal control. Accordingly, we do not express an opinion on the effectiveness of the State's internal control.

Our consideration of internal control was for the limited purpose described in the preceding paragraph and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies and, therefore, material weaknesses or significant deficiencies may exist that were not identified.

Along with other operational issues, we noted certain internal control or compliance matters related to the activities of the Nebraska Purchase Card Program (Program) which are presented below for your consideration. The following comments and recommendations, which have been discussed with the appropriate members of the agencies and their management, are intended to improve internal control or result in other operating efficiencies.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A material weakness is a deficiency, or a combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected, on a timely basis. We did not identify any deficiencies in internal control that we consider to be material weaknesses.

A significant deficiency is a deficiency, or combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance. We did not identify any deficiencies in internal control that we consider to be a significant deficiency.

Draft copies of this letter were furnished to provide management with an opportunity to review and to respond to the comments and recommendations contained herein. Any formal responses received have been incorporated into this letter. Such responses have been objectively evaluated and recognized, as appropriate, in the letter. A response that indicates corrective action has been taken was not verified at this time, but it will be verified in the next audit.

## **Background Information**

Neb. Rev. Stat. § 81-118.02 (Cum. Supp. 2016) created the State Purchasing Card Program (Program) and gave authority to the State Treasurer and Director of Administrative Services (DAS) to determine the type of purchasing card utilized. The State Treasurer signed a contract to issue Visa credit cards with US Bank in September 1999. The DAS Accounting Division (State Accounting) administers the Program.

The Program is intended to help make State government more efficient and cost-effective by modernizing the purchasing process. The purchasing card is an alternative to invoicing by providing for direct pay, which allows more purchasing options and can significantly reduce costs associated with accounting transactions.

The purchasing card can be used for payment to any supplier who accepts Visa cards, and it can be used for in-store purchases as well as mail, telephone, Internet, and fax orders. However, suppliers are assigned a four-digit Merchant Category Code (MCC) in the VISA system. This allows State Accounting to block certain codes to prevent the cards from being used for unauthorized transactions, including purchases from restaurants and liquor stores. If an individual tries to use a State purchasing card at a vendor on the blocked MCC list, the purchase will be declined.

A DAS Purchasing Card Manual released initially on December 20, 2013, references only “individual” and “agency” purchasing cards; however, “utility” purchasing cards are also in use. Individual cards are limited to a \$2,000 single purchase limit, a \$10,000 monthly spending limit, and are more restricted than agency and fleet cards. Agency cards are limited to a \$5,000 single purchase limit, a \$25,000 monthly spending limit, and can be used at additional merchants, including airlines. Utility cards have significantly larger single purchase and monthly spending limits than other cards and are restricted to only utility (i.e., electricity, water and sewer) merchants. Purchases attempted for amounts over the cards limits are declined.

Credit card statements are sent to the individual cardholder and State Accounting monthly. The cardholder is responsible for obtaining receipts for all purchases and attaching them to the monthly statement. In addition to paper statements, State Accounting receives an electronic copy of every statement and imports the data into the State accounting system. A payment to US Bank is created at that time, and each agency’s fund is charged for the amount on its statement. State Accounting codes the payment to US Bank to a clearing expenditure account and starts a journal entry for agencies to change the coding. Agencies are then responsible for verifying that the statements from the cardholders agree to the journal entry and moving the expenses from the clearing account to the appropriate expenditure account. Each agency is to have a coordinator who trains cardholders, distributes the cards, and obtains the bank statements and receipts.

As of June 30, 2017, 56 agencies were participating in the Program, with a total of 1,557 active cards. During the period of July 2016 through June 2017, agencies expended \$14,948,640 through purchasing cards. The agencies with the highest purchasing card transaction amounts are shown in the table below:

Agency	Number of Cards	Transaction Amount	Declined Transaction Amount
Department of Transportation (formerly Roads)	482	\$5,122,521.80	\$1,925,631.70
Game & Parks Commission	285	\$3,088,665.41	\$938,530.31
Department of Correctional Services	197	\$1,988,551.96	\$1,257,973.16
Department of Health & Human Services	187	\$1,340,479.38	\$1,122,534.03
Department of Administrative Services	121	\$1,036,514.96	\$549,381.90
Military Department	17	\$232,588.04	\$103,239.17
Department of Revenue	10	\$210,100.73	\$164,320.51
Department of Education	29	\$170,043.28	\$144,941.68
Department of Agriculture	68	\$166,307.08	\$535,335.87
Commission for the Blind & Visually Impaired	14	\$151,108.75	\$85,457.91
Department of Economic Development	4	\$141,786.65	\$64,185.47
Department of Transportation (formerly Aeronautics)	13	\$116,165.32	\$66,000.33
State Patrol	9	\$92,393.32	\$37,797.81
<i>Other Agencies - 43</i>	<i>121</i>	<i>\$1,091,413.60</i>	<i>\$697,852.95</i>
<b>Totals</b>	<b>1,557</b>	<b>\$14,948,640.28</b>	<b>\$7,693,182.80</b>

See **Exhibit A** for a complete listing of agencies.

Of the 1,557 active purchasing cards, the individual card accounts with the highest spending are summarized in the table below:

Account Number	Agency	Transaction Amount	Declined Transaction Amount
**2706	Department of Correctional Services	\$157,595.88	\$13,224.50
**1853	Department of Transportation	\$118,688.00	\$37,897.42
**2123	Game & Parks Commission	\$115,541.29	\$1,898.95
**4434	Department of Revenue	\$114,764.37	\$119,688.60
**6857	Game & Parks Commission	\$102,508.74	\$26,434.02
**2643	Department of Correctional Services	\$101,223.24	\$0.00
**9644	Department of Transportation	\$94,061.38	\$25,372.89
**2892	Department of Transportation	\$91,637.33	\$4,762.05
**2684	Military Department	\$77,651.62	\$12,571.50
**3716	Department of Transportation	\$76,170.06	\$23,739.88
<i>Various</i>	<i>Other Cards - 1,547</i>	<i>\$13,898,798.37</i>	<i>\$7,427,592.99</i>
<b>Totals</b>		<b>\$14,948,640.28</b>	<b>\$7,693,182.80</b>

Merchants with the highest purchasing card transaction amounts during fiscal year 2017 are shown in the table below:

Merchant Name	Transaction Amount
Walmart	\$533,507.58
Amazon	\$493,479.77
Menards	\$470,247.43
WW Grainger	\$242,205.49
Wick's Sterling Trucks	\$217,912.06
United States Postal Service	\$214,094.43
Cornhusker International	\$187,932.73
Bomgaars	\$172,849.23
Norris Public Power District	\$159,253.85
Kimball Midwest	\$124,406.56

Merchant Name	Transaction Amount
Northeast Nebraska Public Power District	\$115,993.29
NAPA Auto Parts	\$113,479.90
Truck Center Companies	\$110,162.56
United Airlines	\$107,499.53
Home Depot	\$102,400.21
<i>Other Vendors - 6,162</i>	<i>\$11,583,215.66</i>
<b>Total</b>	<b>\$14,948,640.28</b>

See **Exhibit B** for a listing of vendors with purchases totaling over \$15,000.

### **Comments and Recommendations**

#### **1. Use of Menards Rebates**

During fiscal year 2017, the State of Nebraska did not have an official policy regarding the use of rebates earned on purchases made with the State's purchasing cards.

The APA learned of a few State employees being terminated as a result of their personal use of rebates earned on purchases made at Menards with State purchasing cards. As a result, the APA began a detailed review of the State purchasing card transactions from Menards. The following table shows State agencies' use of purchasing cards at Menards during fiscal year 2017:

Managing Account Name	Transaction Amount
GAME & PARKS	\$209,002.01
AS STATE BUILDING	\$87,780.89
DEPT OF TRANSPORTATION	\$62,469.79
DEPT OF CORRECTIONS	\$60,881.06
MILITARY DEPARTMENT	\$25,003.23
DEPT OF HHS	\$10,211.11
BRD OF ENGNRS & ARCHT	\$5,205.87
ETV COMMISSION	\$3,572.12
AS CAPITOL COMMISSION	\$3,498.17
AS OCIO	\$835.18
DEPT OF AGRICULTURE	\$534.39
STATE ELECTRICAL DIV	\$400.60
SUPREME COURT	\$357.13
DEPT OF NAT RESOURCES	\$160.24
AS MATERIEL	\$137.85
DEPT OF REVENUE	\$102.11
DEPT OF LABOR	\$65.70
VETERANS AFFAIRS	\$29.98
<b>Total</b>	<b>\$470,247.43</b>

The APA obtained specific rebate information directly from Menards for six State employees. The following table identifies the six purchasing cards tested, the State agencies responsible for those cards, the amount of purchases from Menards for each card during fiscal year 2017, the amount of purchases that earned rebates, and the amount of redeemed rebates:

Purchasing Card Number	Agency	FY 2017 Transaction Amount	Purchases That Earned Rebates	Redeemed Rebate Amount
**6064	GAME & PARKS	\$30,453.71	\$9,888.72	\$884.63
**8029	GAME & PARKS	\$16,920.37	\$8,866.47	\$939.85
**5991	GAME & PARKS	\$14,443.53	\$5,831.46	\$596.24
**8317	GAME & PARKS	\$13,596.05	\$4,394.73	\$483.42
**0338	GAME & PARKS	\$10,251.30	\$2,772.30	\$302.63
**7329	DEPT OF CORRECTIONS	\$10,110.75	\$1,426.61	\$156.92
<b>Totals</b>		<b>\$95,775.71</b>	<b>\$33,180.29</b>	<b>\$3,363.69</b>

Menards provided the detailed transaction information for the redeemed rebates. The APA noted a number of transactions that appeared to be personal in nature or that could have been used either personally or for official State business.

### *Gas Grill and Grill Cover*

One employee purchased a gas grill and grill cover for \$303.99 with rebates earned on the State's purchasing card, as follows:

Comments

Comments

No Comments

Items Sold

Description	Qty	Rtn'd Qty	Price	Discount	Amt Paid	Total Tax	Tax	Jurisdiction
GAS GRILL W/SS HOOD 463239915 2593045	1	0	269.00	0.00	269.00	0.00	N	NE6936100
Product Code: 76800	Tax Exempt Reason: 12							
Pick/Take: T								
PREMIUM XL GRILL COVER 1705-0009 2597002	1	0	34.99	0.00	34.99	0.00	N	NE6936100
Product Code: 76800	Tax Exempt Reason: 12							
Pick/Take: T								
MENARD REBATE 31	-1	0	-13.86	0.00	-13.86	0.00	N	NE6936100
Product Code: 89999	Serial Number: 6132950877 Tax Exempt Reason: 12							
Pick/Take: T								
MENARD REBATE 31	-1	0	-221.95	0.00	-221.95	0.00	N	NE6936100
Product Code: 89999	Serial Number: 6136320141 Tax Exempt Reason: 12							
Pick/Take: T								
MENARD REBATE 31	-1	0	-59.14	0.00	-59.14	0.00	N	NE6936100
Product Code: 89999	Serial Number: 6134633646 Tax Exempt Reason: 12							
Pick/Take: T								
MENARD REBATE 31	-1	0	-9.04	0.00	-9.04	0.00	N	NE6936100
Product Code: 89999	Serial Number: 6130567216 Tax Exempt Reason: 12							
Pick/Take: T								

Tax Summary

(N4636601)	Tax Breakdown	Rate	Total Tax
Total Tax			0.00
Total Fee			0.00

Taxes

These two transactions are the purchase of the gas grill and grill cover.

Menards had previously identified this rebate number as having been earned using a State purchasing card.

These two transactions are the purchase of the gas grill and grill cover.

Menards had previously identified this rebate number as having been earned using a State purchasing card.

The following information from Menards provides more details on the rebates, such as the date and store in which they were earned:

Barcode History for <b>6136320141</b>									
<b>Issuance Details</b>									
Issuing Unit	Unit Name	Original Balance	Current Balance	Curr Status	Date	Time	Reg	Tran	
1001	CORPORATE ADM	221.95	0	Active	09/19/2016	12:00:00 AM	0	0	
<b>Issued To:</b>									
<div style="display: flex; justify-content: space-between;"> <div style="background-color: black; width: 150px; height: 30px;"></div> <div>The name and address of the cardholder have been removed by the APA.</div> </div>									
<b>Other issuance information:</b>									
Store Date	Reg Tran	Prog	Description	Amount					
3260 07/26/2016	7	2675	5186 SAVE 11%	62.42	Rebates were earned on these three transactions.				
3260 07/26/2016	7	2676	5186 SAVE 11%	128.36					
3260 07/26/2016	5	9133	5186 SAVE 11%	31.17					

The following is transaction number 2675:

<b>Hierarchy</b>									
All >> Store >> 03260-SCOTTSDLUFF >> Register 007									
<b>Transaction</b>									
<div style="display: flex; justify-content: space-between;"> <div> <b>Transaction Number:</b>02675  <b>Type:</b>Sale  <b>Reentry Mode:</b>Off  <b>Tax Exempt:</b>NE0042406 </div> <div> <b>Date:</b>07/26/2016  <b>Operator ID:</b>67216  <b>Status:</b>Completed  <b>Exempt Code:</b>12 </div> <div> <b>Time:</b>3:03 PM  <b>Employee ID:</b>1367216  <b>Training Mode:</b>Off </div> </div>									
<b>Comments</b>									
No Comments									
<b>Items Sold</b>									
Description	Qty	Rtn'd Qty	Price	Discount	Amt Paid	Total Tax	Tax	Jurisdiction	
10GUN FIRE SAFE ELEC LOCKFSS-10-MB-E 4808980	1	0	249.00	0.00	249.00	0.00	N	NE6936100	
Product Code: 76800 Tax Exempt Reason: 12									
Document Number: 26802 Sequence Number: 1									
SECURITY CABINET BLACK 10GUN GCWB-10 4808791	1	0	99.00	0.00	99.00	0.00	N	NE6936100	
Product Code: 76759 Tax Exempt Reason: 12									
Document Number: 26802 Sequence Number: 2									
SPRING SNAP ZN 7/16 M245343 2257292	15	0	28.35	0.00	28.35	0.00	N	NE6936100	
Product Code: 76800 Tax Exempt Reason: 12									
TRADITIONS UTY HK RB P27115-RB 4880470	2	0	6.58	0.00	6.58	0.00	N	NE6936100	
Product Code: 76800 Tax Exempt Reason: 12									
3"X3-1/2" CHEST HANDLE-N203-752 2257932	1	0	4.59	0.00	4.59	0.00	N	NE6936100	
Product Code: 76800 Tax Exempt Reason: 12									
ELECTRONICS SURGE METAL 041552/04690	1	0	12.99	0.00	12.99	0.00	N	NE6936100	

Transaction Number 2675 (Continued)

3705633  
Product Code: 76800 Tax Exempt Reason: 12  
3/8X4-1/2 LAG SCREWEYE- 10 0 12.80 0.00 12.80 0.00 N NE6936100  
ZNN220-707  
2255400  
Product Code: 76800 Tax Exempt Reason: 12  
10"X14" NO SMOKING 6 0 5.82 0.00 5.82 0.00 N NE6936100  
SIGN 840149 / 811  
2160168  
Product Code: 76800 Tax Exempt Reason: 12  
TITANIUM SPD DRILL 1/2" 1 0 10.99 0.00 10.99 0.00 N NE6936100  
9627MASTERFORCE  
2529225  
Product Code: 76800 Tax Exempt Reason: 12  
1X2-24" WOOD STAKES 24 2 0 17.58 0.00 17.58 0.00 N NE6936100  
PC/BUNDLE  
1023141  
Product Code: 76431 Tax Exempt Reason: 12  
RIMFIRE RESETTNG 4 0 59.96 0.00 59.96 0.00 N NE6936100  
TARGET  
1758573  
Product Code: 75930 Tax Exempt Reason: 12  
INSTANT POST CEMENT 12 0 59.76 0.00 59.76 0.00 N NE6936100  
50 LB  
1894027  
Product Code: 76432 Tax Exempt Reason: 12

**Tax Summary**

Tax Breakdown		Rate	Total Tax
Total Tax			0.00
Total Fee			0.00

**Taxes**

0000000000			0.00
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**Totals**

Subtotal	Discount	Tax	Quantity	Total
567.42	0.00	0.00	56.00	567.42

**Tenders Applied**

Type	Brand	in	Track ID	Entry Method	Amount
CRDT	Visa	[REDACTED]		Chip	567.42

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This is the beginning of the State's purchasing card number.

The rebate was 11% of the total amount. (11% of \$567.42 is \$62.42)

The following is transaction number 2676:

Transaction									
—									
<b>Transaction Number:</b> 02676			<b>Date:</b> 07/26/2016			<b>Time:</b> 3:05 PM			
<b>Type:</b> Sale			<b>Operator ID:</b> 67216			<b>Employee ID:</b> 1367216			
<b>Reentry Mode:</b> Off			<b>Status:</b> Completed			<b>Training Mode:</b> Off			
<b>Tax Exempt:</b> NE0042406			<b>Exempt Code:</b> 12						
Comments									
No Comments									
Items Sold									
Description	Qty	Rtn'd Qty	Price	Discount	Amt Paid	Total Tax	Tax	Jurisdiction	
CEDAR END POST JUMBO 5'4" TWO HOLE 1731051	36	0	351.72	0.00	351.72	0.00	N	NE6936100	
Product Code: 76800 Tax Exempt Reason: 12									
Document Number: 26803 Sequence Number: 1									
CEDAR LINE POST JUMBO 5'4" TWO HOLE 1731019	16	0	156.32	0.00	156.32	0.00	N	NE6936100	
Product Code: 76800 Tax Exempt Reason: 12									
Document Number: 26803 Sequence Number: 2									
10' HANDSPLIT CEDAR RAIL JUMBO 1731006	64	0	639.36	0.00	639.36	0.00	N	NE6936100	
Product Code: 76800 Tax Exempt Reason: 12									
Document Number: 26803 Sequence Number: 3									
CEDAR LINE POST JUMBO 5'4" TWO HOLE 1731019	2	0	19.54	0.00	19.54	0.00	N	NE6936100	
Product Code: 76800 Tax Exempt Reason: 12									
Document Number: 26804 Sequence Number: 2									
Tax Summary									
Tax Breakdown			Rate		Total Tax				
Total Tax					0.00				

Total Fee				0.00	
Taxes				0.00	
0000000000					
Totals					
Subtotal	Discount	Tax	Quantity	Total	
1166.94	0.00	0.00	118.00	1166.94	
Tenders Applied					
Type	Brand	ID	Track ID	Entry Method	Amount
CRDT	Visa			Chip	1166.94

This is the beginning of the State's purchasing card number.

The rebate was 11% of the total amount. (11% of \$1,166.94 is \$128.36)

The following is transaction number 9133:

<b>Hierarchy</b>									
—									
All >> Store >> 03260-SCOTTSBLUFF >> Register 005									
<b>Transaction</b>									
—									
<b>Transaction Number:</b> 09133			<b>Date:</b> 07/26/2016			<b>Time:</b> 8:35 AM			
<b>Type:</b> Sale			<b>Operator ID:</b> 3079			<b>Employee ID:</b> 1103079			
<b>Reentry Mode:</b> Off			<b>Status:</b> Completed			<b>Training Mode:</b> Off			
<b>Tax Exempt:</b> NE0042406			<b>Exempt Code:</b> 12						
<b>Comments</b>									
Comments									
No Comments									
<b>Items Sold</b>									
Description	Qty	Rtn'd Qty	Price	Discount	Amt Paid	Total Tax	Tax	Jurisdiction	
7X14 BELGIAN WALL 27LB QUARRY GRAY	33	0	95.37	0.00	95.37	0.00	N	NE6936100	
1793650									
Product Code: 76800									
Tax Exempt Reason: 12									
Document Number: 26739									
Sequence Number: 1									
16X24 WETCAST YORKSTONE CHARCOAL	4	0	39.96	0.00	39.96	0.00	N	NE6936100	
1791882									
Product Code: 76800									
Tax Exempt Reason: 12									
8X16 WETCAST YORKSTONE CHARCOAL	2	0	6.98	0.00	6.98	0.00	N	NE6936100	
1791880									
Product Code: 76800									
Tax Exempt Reason: 12									
6X6 BELGIAN REV 6LB SIENNA	16	0	10.88	0.00	10.88	0.00	N	NE6936100	
1792772									
Product Code: 76800									
Tax Exempt Reason: 12									
12" CATALINA EDGER QUARRY GRAY	3	0	5.37	0.00	5.37	0.00	N	NE6936100	
1792560									
Product Code: 76800									
Tax Exempt Reason: 12									
PROVANTAGE ADHESIVE 10 OZLANDSCAPE #3121	24	0	95.76	0.00	95.76	0.00	N	NE6936100	
5202025									

Transaction Number 9133 (Continued)

Product Code: 76800	Tax Exempt Reason: 12						
WELDABLE RND/CR 1/2"- 3FT0011/11603	4	0	23.08	0.00	23.08	0.00	N NE6936100
2279460							
Product Code: 76800	Tax Exempt Reason: 12						
STOP DRIP CAULK GUN #3204	1	0	5.97	0.00	5.97	0.00	N NE6936100
5619757							
Product Code: 76620	Tax Exempt Reason: 12						
7X14 BELGIAN WALL 27LB QUARRY GRAY	33	0	95.37	0.00	95.37	6.68	Y NE6936100
1793650							
Product Code: 76800							
***Voided Item***							
7X14 BELGIAN WALL 27LB QUARRY GRAY	-33	0	-95.37	0.00	-95.37	-6.68	Y NE6936100
1793650							
Product Code: 76800							
***Voided Item***							

Tax Summary							
NE6936100		Tax Breakdown		Rate		Total Tax	
Total Tax						0.00	
Total Fee						0.00	
Taxes							
0000000000						0.00	
Totals							
Subtotal		Discount		Tax		Quantity	
283.37		0.00		0.00		87.00	
						283.37	
Tenders Applied							
Type	Brand	ID	Track ID	Entry Method	Amount		
CRDT	Visa			Chip	283.37		

This is the beginning of the State's purchasing card number.

The rebate was 11% of the total amount. (11% of \$283.37 is \$31.17)

### *Holiday/Personal Purchases*

The same employee used rebates earned on the State's purchasing card to purchase items that appear to be personal in nature. The following purchase (Transaction Number 8976) with rebates was made on December 10, 2016:

<b>Hierarchy</b>									
All >> Store >> 03260-SCOTTSBLUFF >> Register 005									
<b>Transaction</b>									
Transaction Number:08976      Date:12/10/2016      Time:2:53 PM									
Type:Sale      Operator ID:67308      Employee ID:1367308									
Reentry Mode:Off      Status:Completed      Training Mode:Off									
<b>Comments</b>									
No Comments									
<b>Items Sold</b>									
Description	Qty	Rtn'd Qty	Price	Discount	Amt Paid	Total Tax	Tax	Jurisdiction	
50"X60" FLEECE THROW ASSORTED 7152000 Product Code: 76258 Pick/Take: T	2	0	3.76	0.00	3.76	0.05	Y	NE6936100	
PET BOW TIE 70050 2538960 Product Code: 77040 Pick/Take: T	1	0	2.00	0.00	2.00	0.03	Y	NE6936100	
ASSORTED COLOR BATH SET MD15BSET 5714011 Product Code: 76800 Pick/Take: T	1	0	4.99	0.00	4.99	0.08	Y	NE6936100	
SKY RIPPERZ 2 PK ZB521 2791004 Product Code: 76317 Pick/Take: T	2	0	9.98	0.00	9.98	0.14	Y	NE6936100	
SOFTEE DOUGH 5 PACK 13511 2792029 Product Code: 76800 Pick/Take: T	3	0	8.97	0.00	8.97	0.13	Y	NE6936100	
DOLLHOUSE AND FARMHOUSE 22063/5 2794077 Product Code: 76800 Pick/Take: T	1	0	12.99	0.00	12.99	0.17	Y	NE6936100	
COINS MILK CHOCOLATE 66046 1.5OZ 5752048 Product Code: 75040 Pick/Take: T	4	0	4.00	0.00	4.00	0.00	N	NE6936100	
Page ( 1 )									

## Transaction Number 8976 (Continued)

Transaction Detail								
TROLI CAN OF WORMS 80921 2.5OZ 5755401 Product Code: 75040 Pick/Take: T	2	0	3.50	0.00	3.50	0.00	N	NE6936100
RICEKRISPIE TREATS MONSTR78523/6.24 OZ 5732477 Product Code: 75026 Pick/Take: T	1	0	1.98	0.00	1.98	0.00	N	NE6936100
RICE KRISPY TREATS 8PK 12/35056 6.2OZ 5732214 Product Code: 75026 Pick/Take: T	1	0	1.98	0.00	1.98	0.00	N	NE6936100
COCOA KRISPIE M&M TREAT 14914 5.64 OZ 5737070 Product Code: 75250 Pick/Take: T	1	0	1.98	0.00	1.98	0.00	N	NE6936100
MAGNETIC CLIPS 4 PC 21788 4735976 Product Code: 76800 Pick/Take: T	1	0	2.00	0.00	2.00	0.03	Y	NE6936100
FOLDING KNIFE MINI 83-255-116 2432975 Product Code: 76800 Pick/Take: T	3	0	6.00	0.00	6.00	0.09	Y	NE6936100
KIDS CLASSIC CARDS 4A 1483 2790085 Product Code: 76800 Pick/Take: T	4	0	5.96	0.00	5.96	0.09	Y	NE6936100
YORK PATTIES 1# 03038 16OZ 5754213 Product Code: 75040 Pick/Take: T	1	0	7.99	0.00	7.99	0.00	N	NE6936100
3PC DOME COMBO ASST CU4110 2762105 Product Code: 76488 Pick/Take: T	1	0	24.99	0.00	24.99	0.34	Y	NE6936100
ASSRT HOLIDAY CHOCO 1.6OZ45H1624C0980 5755395 Product Code: 75040 Pick/Take: T	4	0	4.00	0.00	4.00	0.00	N	NE6936100
Page ( 2 )								

Transaction Number 8976 (Continued)

Transaction Detail								
Q NORTH ULTRA PLUSH 12DR 87252 6481229 Product Code: 76030 Pick/Take: T	1	0	6.97	0.00	6.97	0.10	Y	NE6936100
IRON HOLD MAXIMUM BAGS 1372532 6485182 Product Code: 76800 Pick/Take: T	1	0	11.99	0.00	11.99	0.17	Y	NE6936100
IRON HOLD KITCHEN BAGS 1372530 6485329 Product Code: 76800 Pick/Take: T	1	0	9.79	0.00	9.79	0.14	Y	NE6936100
MILK CHOCO TRUFFLE MINI C000535 .8OZ 5755418 Product Code: 75040 Pick/Take: T	1	0	1.00	0.00	1.00	0.00	N	NE6936100
16CT LUNCH NAPKINS 666122 2820682 Product Code: 76800 Pick/Take: T	2	0	2.58	0.00	2.58	0.03	Y	NE6936100
DARK CHOC & MINT 61867 5.32OZ 5752017 Product Code: 75040 Pick/Take: T	1	0	2.50	0.00	2.50	0.00	N	NE6936100
HORMEL ORIGINAL BACON BLK LABEL 24OZ 5738987 Product Code: 75200 Pick/Take: T	1	0	5.99	0.00	5.99	0.00	N	NE6936100
18X30 HOLIDAY MAT HEAT TRANSFER 7035729 Product Code: 76800 Pick/Take: T	1	0	3.49	0.00	3.49	0.05	Y	NE6936100
STEFFI LOVE 11" DOLL ASST105734130 2794133 Product Code: 76800 Pick/Take: T	1	0	3.99	0.00	3.99	0.05	Y	NE6936100
24PC BLOCK SET NETTED PDQ9024 2792025 Product Code: 76800 Pick/Take: T	3	0	8.97	0.00	8.97	0.12	Y	NE6936100

Transaction Number 8976 (Continued)

Transaction Detail								
VINTAGE SKILLET COOKIE OR BRNIE 5733017 Product Code: 75200 Pick/Take: T	2	0	9.98	0.00	9.98	0.00	N	NE6936100
BLUETOOTH OUTLET SPEAKER WPBT1 3015519 Product Code: 76672 Pick/Take: T	1	0	27.99	0.00	27.99	0.39	Y	NE6936100
31PC TOOL SET WITH BAG DR63307 2440979 Product Code: 76800 Pick/Take: T	3	0	68.94	0.00	68.94	0.97	Y	NE6936100
DINORIFFIC PLUSH ASST 10921 2794069 Product Code: 76800 Pick/Take: T	1	0	4.99	0.00	4.99	0.08	Y	NE6936100
TOOTSIE ROLL BUNCH POP 3748 3.6OZ 5752050 Product Code: 75040 Pick/Take: T	1	0	1.00	0.00	1.00	0.00	N	NE6936100
AQUARIUM LAVA LAMP 7208 3472531 Product Code: 77145 Pick/Take: T	1	0	19.97	0.00	19.97	0.28	Y	NE6936100
LED MAGNETIC WORKLIGHT 59222WD 3703753 Product Code: 77145 Pick/Take: T	1	0	5.99	0.00	5.99	0.07	Y	NE6936100
BOOTSCRAPER CINDER 10376313 7030946 Product Code: 76800 Pick/Take: T	1	0	11.99	0.00	11.99	0.16	Y	NE6936100
COFFEES OF CHRISTMAS 12 FLAVORS 5733006 Product Code: 75050 Pick/Take: T	1	0	7.99	0.00	7.99	0.00	N	NE6936100
BTTR THAN GRAVY - CHICKEN1 OZ MIX 5737173 Product Code: 75200 Pick/Take: T	2	0	3.38	0.00	3.38	0.00	N	NE6936100
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Transaction Number 8976 (Continued)

Transaction Detail

UNIVERSAL TABLET CASE UKC-16-2723 3019918 Product Code: 78235 Pick/Take: T	1	0	12.49	0.00	12.49	0.18	Y	NE6936100
PEANUT BRITTLE GIFT BOX 2C1216070 16OZ 5755434 Product Code: 75040 Pick/Take: T	1	0	4.50	0.00	4.50	0.00	N	NE6936100
31PC LADIES TOOL SET 85498 2440970 Product Code: 76800 Pick/Take: T	1	0	22.98	0.00	22.98	0.32	Y	NE6936100
MENARD REBATE 31 Serial Number: 6136295805 Product Code: 89999 Pick/Take: T	-1	0	-3.91	0.00	-3.91	0.00	N	NE6936100
MENARD REBATE 31 Serial Number: 6134459385 Product Code: 89999 Pick/Take: T	-1	0	-3.68	0.00	-3.68	0.00	N	NE6936100
MENARD REBATE 31 Serial Number: 6129914075 Product Code: 89999 Pick/Take: T	-1	0	-8.83	0.00	-8.83	0.00	N	NE6936100
MENARD REBATE 31 Serial Number: 6123376582 Product Code: 89999 Pick/Take: T	-1	0	-3.59	0.00	-3.59	0.00	N	NE6936100
MENARD REBATE 31 Serial Number: 6125167265 Product Code: 89999 Pick/Take: T	-1	0	-3.23	0.00	-3.23	0.00	N	NE6936100
MENARD REBATE 31 Serial Number: 6124554407 Product Code: 89999 Pick/Take: T	-1	0	-30.00	0.00	-30.00	0.00	N	NE6936100
MENARD REBATE 31 Serial Number: 6139043800 Product Code: 89999 Pick/Take: T	-1	0	-184.05	0.00	-184.05	0.00	N	NE6936100
MENARD REBATE 31 Serial Number: 6137140121 Product Code: 89999 Pick/Take: T	-1	0	-56.00	0.00	-56.00	0.00	N	NE6936100

Tax Summary

NE6936100	Tax Breakdown	Rate	Total Tax
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Transaction Number 8976 (Continued)

Transaction Detail

State	STATE NE	0.0550	3.35
City	CITY OF SCOTTSBLUFF	0.0150	0.91
Total Tax			4.26
Total Fee			0.00

Taxes

GeoCode	Amount
3115744245	4.26

Totals

Subtotal	Discount	Tax	Quantity	Total
73.24	0.00	4.26	55.00	77.50

Tenders Applied

Type	Brand	ID	Track ID	Entry Method	Amount
CRDT	Visa			Swiped	77.50

Rebates totaling \$293.29 were redeemed and the balance of the amount due for this transaction was paid using a credit card that did not belong to the State, providing further evidence that the purchase was for personal use.

**Other Questionable Purchases**

The APA observed several other questionable purchases made with rebates earned on the State's purchasing card. The balance of the following \$280.46 purchase of an air purifier, filter, towing mount, and hitch pin was paid with a personal credit card:

Items Sold									
Description	Qty	Rtn'd Qty	Price	Discount	Amt Paid	Total Tax	Tax	Jurisdiction	
TRUEHEPA X-LARGE CONSOLE HPA300 6336122 Product Code: 76376 Pick/Take: T	1	0	199.99	0.00	199.99	2.66	Y	NE6812700	
TRUEHEPA FILTER COMBO PK HRF-ARVP 6336306 Product Code: 76800 Pick/Take: T	1	0	49.99	0.00	49.99	0.66	Y	NE6812700	
TRIBALL MOUNT 783 2618723 Product Code: 76800 Pick/Take: T	1	0	27.99	0.00	27.99	0.37	Y	NE6812700	
5/8" STANDARD BENT PIN 747M 2618683 Product Code: 76800 Pick/Take: T	1	0	2.49	0.00	2.49	0.05	Y	NE6812700	
MENARD REBATE 31 Product Code: 89999 Pick/Take: T	-1	0	-93.82	0.00	-93.82	0.00	N	NE6812700	Serial Number: 6140262098
MENARD REBATE 31 Product Code: 89999 Pick/Take: T	-1	0	-94.24	0.00	-94.24	0.00	N	NE6812700	Serial Number: 6143979566
MENARD REBATE 31 Product Code: 89999 Pick/Take: T	-1	0	-39.01	0.00	-39.01	0.00	N	NE6812700	Serial Number: 6136453939

The following \$49.96 purchases appear to be personal in nature and were made using rebates earned with the State's purchasing card:

Items Sold								
Description	Qty	Rtn'd Qty	Price	Discount	Amt Paid	Total Tax	Tax	Jurisdiction
LOW BACK BEACH CHAIR ASSTSC580-821709MN 2738036 Product Code: 76710 Pick/Take: T	1	0	12.99	0.00	12.99	0.50	Y	NE6910100
28 QT. WHEELED COOLER 3000003660 2762049 Product Code: 76488 Pick/Take: T	1	0	26.99	0.00	26.99	1.04	Y	NE6910100
14-3 6' TRI-TAP EXT CORD 40048803 3700339 Product Code: 76800 Pick/Take: T	1	0	9.98	0.00	9.98	0.38	Y	NE6910100
MENARD REBATE 31 Product Code: 89999 Pick/Take: T	-1	0	-17.34	0.00	-17.34	0.00	N	NE6910100
Serial Number: 6151178957								
MENARD REBATE 31 Product Code: 89999 Pick/Take: T	-1	0	-5.18	0.00	-5.18	0.00	N	NE6910100
Serial Number: 6149917079								

The following \$190.09 purchase of an electric fireplace, oil filters, and flowers was made using rebates earned with the State's purchasing card. A personal check was used to pay the remaining balance of the transaction.

Items Sold

Description	Qty	Rtn'd Qty	Price	Discount	Amt Paid	Total Tax	Tax	Jurisdiction
SHELDON 36"EL FP CHERRY WSF36SH23M 6415022 Product Code: 76800 Pick/Take: T	1	0	179.00	0.00	179.00	4.67	Y	NE6852100
EXTRA GUARD OIL FILTER PH16 2617873 Product Code: 76800 Pick/Take: T	2	0	7.54	0.00	7.54	0.20	Y	NE6852100
BURGUNDY AND PINK ROSE 72136 5901988 Product Code: 76800 Pick/Take: T	1	0	3.55	0.00	3.55	0.09	Y	NE6852100
MENARD REBATE 31 Serial Number: 6138108213 Product Code: 89999 Pick/Take: T	-1	0	-93.00	0.00	-93.00	0.00	N	NE6852100
MENARD REBATE 31 Serial Number: 6130306960 Product Code: 89999 Pick/Take: T	-1	0	-28.70	0.00	-28.70	0.00	N	NE6852100

Tax Summary

NE6852100	Tax Breakdown	Rate	Total Tax
State	STATE NE	0.0550	3.76
City	CITY OF LINCOLN	0.0175	1.20
Total Tax			4.96
Total Fee			0.00

Taxes

GeoCode	Amount
3110928000	4.96

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Totals					
Subtotal	Discount	Tax	Quantity	Total	
68.39	0.00	4.96	2.00	73.35	
Tenders Applied					
Type	Brand	ID	Track ID	Entry Method	Amount
CHCK		14010031		MICR Reader	73.35

The following items were also purchased using rebates earned on the State's purchasing card. These items could be considered either personal or for State use. However, there was no verification by the agency as to whether the purchases were for personal or State use.

Wood blinds	Paint	Car battery/oil filter
Counters and countertops	Baseboards	Snacks
Sinks and faucets	Bird food	Detergents/soaps
Doors and door handles	Cat food	Clothing

For the remaining State employees who used the purchasing cards at Menards, the APA reviewed the Menards rebate website, <http://www.rebateinternational.com/RebateInternational/tracking.do>, to determine if any of those employees had Menards rebates sent to their home address. The APA found that 178 of the 468 employees who had used the State purchasing card at Menards had a rebate from that store sent to their home address.

**The APA did not determine how the rebates were earned – either personally or using a State purchasing card – simply whether a Menards rebate had been mailed to the employee's home address.**

The following agencies had employees who used a State purchasing card at Menards during fiscal year 2017 and also received a Menards rebate at their home address.

Agency	Rebates Per Website
DEPT OF TRANSPORTATION	67
GAME & PARKS	51
AS STATE BUILDING	21
DEPT OF CORRECTIONS	15
DEPT OF HHS	7
MILITARY DEPARTMENT	6
AS CAPITOL COMMISSION	4
DEPT OF AGRICULTURE	3
ETV COMMISSION	3
SUPREME COURT	1
<b>Total</b>	<b>178</b>

Finally, the APA reviewed the purchasing card details for three of the six card holders identified on page 6 of this letter to determine the percent of purchases made at Menards compared to other vendors. Those details are included below:

**Total \*\*6064 Purchases by Vendor**

Merchant Name	Amount	% of Total
<b>MENARDS</b>	<b>\$30,453.71</b>	<b>62.07%</b>
HOME DEPOT	\$2,606.79	5.31%
RUSSELS AUTOMOTIVE	\$2,380.56	4.86%
NRA	\$1,861.65	3.79%
CABELAS	\$1,783.76	3.64%
WAL MART	\$1,699.41	3.46%
BOMGAARS	\$1,352.47	2.76%
CARR TRUMBULL	\$1,162.00	2.37%
SHERWIN WILLIAMS	\$743.96	1.52%

Merchant Name	Amount	% of Total
WESTERN TRAILS SPORTS POS	\$670.92	1.37%
DUNHAMS SPORTS	\$643.31	1.31%
B & C STEEL CORPORATION	\$461.42	0.94%
LONGS PEAK COUNCIL INC	\$399.92	0.82%
CROSMAN CORPORATION	\$378.95	0.77%
GENESIS ARCHERY	\$360.00	0.73%
PAUL REED CONSTRUCTION	\$312.98	0.64%
JOHNSON CASHWAY LUMBER	\$303.94	0.62%
USPS	\$259.65	0.53%
HOBBY LOBBY	\$204.78	0.42%
FEDEX	\$157.27	0.32%
RICH S WRECKING	\$131.28	0.27%
NEBRASKALAND TIRE	\$123.66	0.25%
HEILBRUNS AUTO PARTS	\$108.98	0.22%
21ST CENTURY EQUIPMENT	\$105.36	0.21%
THOMPSON GLASS INC	\$91.04	0.19%
HULLINGER GLASS & LOCKS	\$70.25	0.14%
KAWASAKI KORNER INC	\$70.00	0.14%
HOME EVER	\$59.45	0.12%
ADVANCE AUTO PARTS	\$35.98	0.07%
BLUFFS SANITARY SUPPLY IN	\$32.00	0.07%
FASTENAL COMPANY	\$19.79	0.04%
PLAZA FOODS STORE	\$10.26	0.02%
SONNYS SUPER FOOD	\$6.18	0.01%
<b>Totals for Card **6064</b>	<b>\$49,061.68</b>	<b>100.00%</b>

**Total \*\*8029 Purchases by Vendor**

Merchant Name	Amount	% of Total
<b>MENARDS</b>	<b>\$16,920.37</b>	<b>25.33%</b>
BOMGAARS	\$5,597.75	8.38%
WW GRAINGER	\$3,202.84	4.79%
VOSS SIGNS	\$2,578.20	3.86%
MEAD LUMBER	\$2,466.84	3.69%
RACORSTOR/BOATSTOR	\$2,351.47	3.52%
DIRECTV SERVICE	\$2,313.11	3.46%
BECKER BODY SHOP	\$1,976.77	2.96%
CABELAS	\$1,858.67	2.78%
ECHO ELECTRIC SUPPLY	\$1,622.09	2.43%
NATIONAL HOSPITALITY SUPP	\$1,603.72	2.40%
HEARTSMART.COM	\$1,374.00	2.06%
VOSS LIGHTING	\$1,324.72	1.98%
COX AUTO SUPPLY	\$1,307.96	1.96%
FAB WRIGHT	\$1,295.00	1.94%
LAWSON PRODUCTS	\$1,280.37	1.92%
TRIONIC CORPORATION	\$1,245.00	1.86%
HANSEN LOCKSMITHING	\$984.50	1.47%
CEDAR KNOX PUB PWR	\$971.18	1.45%
PONCA COOPERATIVE LLC	\$838.82	1.26%
KELLEN & STREIT	\$814.13	1.22%
SHERWIN WILLIAMS	\$807.39	1.21%
WINNELSON CO	\$646.94	0.97%
STAN HOUSTON EQUIPMENT CO	\$640.00	0.96%

Merchant Name	Amount	% of Total
DRI DEK	\$572.90	0.86%
USPS	\$525.29	0.79%
AMERICAN FLOOR MATS	\$486.18	0.73%
BLUEBIRD NURSERY	\$480.95	0.72%
ALLEN CHRISTIAN BUICK	\$479.00	0.72%
KAISER REFRIGERATION IN	\$472.39	0.71%
ZIMCO SUPPLY CO	\$462.50	0.69%
FRED HAAR COMPANY YANKTON	\$425.52	0.64%
LAKELITEINC	\$362.25	0.54%
HOME DEPOT	\$322.62	0.48%
KV VET/NATURALL	\$316.23	0.47%
KROHN CAR CARE	\$312.03	0.47%
KOFFLER SALES CO	\$287.09	0.43%
WEBSTaurant STORE	\$276.24	0.41%
MARKS MACHINERY INC	\$267.78	0.40%
ODORHOG	\$260.84	0.39%
DENNIS SUPPLY COMPANY	\$248.06	0.37%
SPORTSMANS INTERNET STORE	\$239.77	0.35%
MIDWEST RADIATOR	\$215.00	0.32%
SUPPLY CACHE	\$206.95	0.31%
SOLUTIONS PEST & LAWN	\$202.48	0.30%
CLARKS RENTALS CUSTOM COR	\$199.16	0.30%
HY VEE	\$173.87	0.26%
GROSSENBURG IMP	\$172.81	0.26%
DASH MEDICAL GLOVES	\$162.26	0.24%
DELTA POWER EQUIPMENT COR	\$156.75	0.23%
WAYFAIR	\$156.00	0.23%
SHARE CORPORATION	\$147.54	0.22%
ULINE SHIP SUPPLIES	\$140.56	0.21%
GLOBALINDUSTRIALEQ	\$133.94	0.20%
WAL MART	\$120.05	0.18%
DLX FOR BUSINESS	\$112.78	0.17%
PRACTICAL TRAUMA	\$111.90	0.17%
BOATERSPLUS COM	\$110.84	0.17%
FASTENAL COMPANY	\$109.54	0.16%
POTTER COUNTY IMPLEMENT	\$107.00	0.16%
WORLDPAINTSUPPLY COM	\$97.64	0.15%
CABIN FEVER GIFTS & DEC	\$96.00	0.14%
MCCORMACK DISTRIBUTING	\$90.07	0.13%
FELD FIRE	\$89.95	0.13%
TMA YANKTON	\$88.00	0.13%
SUPPLYHOUSE.COM	\$80.95	0.12%
ROCKLER	\$74.96	0.11%
HAYNEEDLE	\$70.29	0.11%
KAISER HEATING & COOLING	\$67.22	0.10%
VANDERHULE MOVING & STORAGE	\$66.83	0.10%
OVERTONS INC	\$54.99	0.08%
WINNING EDGE SPORTS	\$50.15	0.08%
BED BATH & BEYOND	\$41.11	0.06%
CRESCENT ELECTRIC	\$38.80	0.06%
SHORE SHACK	\$38.00	0.06%
EMERGENCY MEDICAL PRODUC	\$35.45	0.05%

Merchant Name	Amount	% of Total
YANKTON MOTORSPORTS LLC	\$35.00	0.05%
EHRESMANN ENGINEERING	\$31.35	0.05%
BOW CREEK METAL INC	\$30.80	0.05%
BATTERY JUNCTION	\$30.48	0.05%
UPS STORE	\$28.08	0.04%
RIVERSIDE HYDRAULICS INC	\$17.77	0.03%
<b>Totals for Card **8029</b>	<b>\$66,812.80</b>	<b>100.00%</b>

**Total \*\*7329 Purchases by Vendor**

Merchant Name (APA)	Amount	% of Total
MENARDS	\$10,110.75	23.86%
JOHNSON HARDWARE	\$5,779.54	13.64%
DIAMOND VOGEL PAINT	\$4,056.81	9.57%
HONEYMAN RENT ALL	\$3,174.35	7.49%
HOME DEPOT	\$2,738.70	6.46%
SITE ONE LANDSCAPE SUPPLY	\$2,123.78	5.01%
PLAINS EQUIPMENT GROUP	\$2,011.17	4.75%
NEBRASKA FURNITURE MART	\$1,307.97	3.09%
LOVELAND GRASS PAD	\$1,279.20	3.02%
LYMAN RICHEY & READY MIXED CONCRETE	\$1,276.84	3.01%
MURPHY TRACTOR EQUIPMENT	\$1,180.00	2.79%
NAPA AUTO PARTS	\$931.25	2.20%
EARL MAY	\$917.03	2.17%
ACE HARDWARE	\$812.67	1.92%
LTR TOWING	\$755.00	1.78%
AMAZON	\$637.28	1.50%
WW GRAINGER	\$571.39	1.35%
GEXPRO7690	\$565.00	1.33%
EGAN SUPPLY COMPANY	\$529.20	1.25%
FENCESCREEN INC	\$521.65	1.23%
MIDWEST TIRE COMPANY INC	\$370.00	0.87%
LOWES	\$299.13	0.71%
TRACTOR SUPPLY CO	\$181.09	0.43%
MATHESON	\$100.66	0.24%
DF SUPPLY INC	\$82.15	0.19%
LANDSCAPE DESIGNS INC	\$35.00	0.08%
TIGHTON TOOL & FASTENER	\$25.50	0.06%
<b>Totals for Card **7329</b>	<b>\$42,373.11</b>	<b>100.00%</b>

In each of the instances included above, Menards was the most-used vendor by the card holders. This letter does not address whether the availability of rebates was an incentive for the amount of purchases made at Menards.

Neb. Rev. Stat. §81-118.02(1) (Cum. Supp. 2016) created the State's purchasing card program, authorizing the Director of Administrative Services to develop rules and regulations relating thereto. That statute says, in relevant part, the following:

*The state purchasing card program shall be administered by the Department of Administrative Services. The department may adopt and promulgate rules and regulations as needed for the implementation of the state purchasing card program. The department may adopt and promulgate rules and regulations providing authorization instructions for all transactions.*

During fiscal year 2017, and prior to the APA's review of these rebate purchases, the State's "Purchasing Card Program Manual" did not contain language pertaining to the proper use of rebates earned with the State purchasing card. This was unlike the University of Nebraska and the State College System, both of which expressly prohibit the personal use of rebates earned with an office purchasing card, allowing such rebates to be accepted only by the cardholder's department for appropriate departmental use.

On October 3, 2017, after the APA alerted the Governor's Office to the issue, the State's "Purchasing Card Program Manual" was modified to restrict the use of rebates in a manner similar to that of the University's and the State College System's purchasing card programs.

In light of the updated policy, good internal controls require procedures to ensure rebates earned with the State purchasing card are accepted only for appropriate State agency use. Without such procedures, there is a risk of loss or misuse of State funds.

We recommend each State agency implement procedures to ensure rebates earned with the State purchasing card are accepted only for appropriate State agency use. Agencies should consider the need to review fiscal year 2017 Menards purchases to determine whether items purchased with State purchasing card rebates were for personal or State use.

*DAS Response: DAS will review current procedures regarding rebates earned with the State purchasing card to assure they are accepted and used appropriately for agency use. DAS-Building Division will also review fiscal year 2017 Menards purchases and take action as deemed necessary.*

*Game and Parks Response: As pointed out in a previous communique with the APA, our review found no evidence of deliberate intent for personal gain in any circumstance. The vast majority of purchases were in fact business/activity related. One large use of a rebate was associated with a newer employee mistakenly disassociating the rebates earned from the original state purchase and purchasing presents for a staff Christmas party. That individual has been coached on the matter and will be in compliance in the future. We, like DAS, have updated our internal Purchasing Card Manual to ensure improved guidance in handling rebate offers is provided and a system of central office coordination of redemption is started.*

*We would point out that the volume of transactions at Menards is neither concerning nor surprising since it typically sells just about everything we need in our diverse operations. Based on price comparisons that our field staff performs routinely (since they must live within their budgets) and the location of the stores, the one-stop shopping at Menards seems quite appropriate and reasonable. The large volume of transactions at Walmart is also not surprising. With over 200 Park/WMA/office locations scattered across the state, Walmart's often are the most prevalent vendor in many locations. In our review we found no evidence of shopping preferences based on rebate availability or other factors other than overall cost/location/convenience.*

*NDCS Response: NDCS issued a policy directive that includes policy and procedure involving rebates and P-Cards. NDCS' required training curriculum is being revised to include this information.*

*NDCS will be contacting employees who used a State P-Card at Menards and also received a rebate at their home address in order to ascertain if the rebate was from the employee's personal purchase or from a state purchase.*

## **2. Purchasing Card Manual**

The Purchasing Card Manual referenced in the “Background Information” section herein provides a description of the Program and the administrative duties of employees in relation thereto; however, the manual does not provide sufficient guidance to users of the purchasing cards. The APA noted a multitude of areas in which guidance was not available to support purchasing card issuance, activity, and limits.

Neb. Rev. Stat. § 81-118.02(6) (Cum. Supp. 2016) states, “No officer or employee of the state shall use a state purchasing card for any unauthorized use as determined by the department by rule and regulation.” Though containing a few random guidelines, the current Purchasing Card Manual is far from comprehensive regarding appropriate purchasing card usage. Furthermore, contrary to the directive in § 81-118.02(6), DAS has not promulgated any formal rules or regulations governing purchasing card transactions.

### ***Game & Parks Utility Cards***

The APA noted seven Game and Parks Commission employees who were each assigned two purchasing cards: a regular purchasing card and a utility card. Per conversations with DAS staff, the utility cards are to be used only for utilities of the recreational areas, and they have a credit limit of \$100,000 and a single purchase limit of \$50,000. These credit limits are much greater than those for any cards described in the Purchasing Card Manual. Additionally, as indicated previously, the Purchasing Card Manual makes no mention whatsoever of utility cards.

Due to the lack of guidance by DAS, the APA could not determine the appropriateness of the number of utility cards issued. The APA noted two utility cards were on file and active for the same recreational area location. It seems unreasonable, though, for a location to need two cards for the same purpose, especially with the increased limits purchase limits allowed.

### ***Employees with Cards at Multiple Agencies***

The APA noted three DAS employees with a total of seven active purchasing cards between them at more than one agency. Two employees had a DAS card and a DHHS card. The other employee had a DAS, DHHS, and a Veterans' Affairs card; however, the Veterans' Affairs card had no activity for fiscal year 2017. Per DAS, these employees need multiple cards as they may incur costs for multiple agencies and one card cannot split the transaction details between multiple agencies. Given that the respective job duties for staff assistants and maintenance specialists relate to more than one agency, it appears reasonable for these employees to have multiple cards. However, the Purchasing Card Manual lacks guidance on monitoring and approval of expenses for these cards. Similarly, the Purchasing Card Manual offers no guidance as to which card should be utilized to ensure that the appropriate agency pays for the expense; therefore, the employees are left to determine which agencies should pay.

In three instances, the employees were using one card significantly more than the others, even though all of the vendors appear to have been similar. See the table below for more details:

Employee	Position	Location	DAS Card	DHHS Card
Employee #1	Staff Assistant	Norfolk Veteran's Home	\$52,009.68	\$664.36
Employee #2	Facility Maintenance Specialist	YRTC – Kearney	\$25,716.28	\$8,053.62
Employee #3	Facility Maintenance Specialist	YRTC - Kearney	\$24,721.47	\$14,499.95

The APA also questions why only these three employees would need multiple purchasing cards. Though seemingly reasonable in this particular instance, the issuance of multiple purchasing cards to individual employees does not appear to be consistent for all DHHS locations. Consequently, DAS guidance regarding the proper issuance of multiple purchasing cards is warranted.

### ***Increased Spending Limits***

The Purchasing Card Manual contains the following regarding spending limits for single purchases:

#### **Cardholder single-purchase limit**

The single-purchase restricts the amount of any single purchase made by a cardholder. It can be comprised of a single or multiple items purchased at one time at a single supplier. The single-purchase limit is \$2,000.00 for individual cards and \$5,000.00 for the agency card.

Per conversations with DAS staff, exceptions are allowed when a higher spending limit is needed. In such instances, the agency must request an increased spending limit from DAS. These requests are typically granted for special circumstances. Nevertheless, the APA noted 176 agency purchasing cards with single purchase limits different than that set out in the Purchasing Card Manual. The table below provides a breakdown of agency purchasing cards with single purchase limits different than that set out in the Purchasing Card Manual:

Agency	Single-Purchase Limit	Number of Cards
Department of Correctional Services (DCS)	\$1,999.00	153
Department of Agriculture	\$2,500.00	1
Department of Health & Human Services (DHHS)	\$3,000.00	1
Department of Transportation	\$4,000.00	1
Game & Parks Commission (Game & Parks)	\$6,000.00	1
DCS	\$7,500.00	6
Legislative Council	\$8,000.00	1
Commission on Law Enforcement & Criminal Justice	\$10,000.00	1
Department of Economic Development (DED)	\$10,000.00	1
Department of Revenue	\$25,000.00	2
DAS Director's Office	\$50,000.00	1
Game & Parks	\$50,000.00	7
<b>Total</b>		<b>176</b>

The Purchasing Card Manual provides the following monthly spending limits for purchasing cards:

### **Cardholder monthly spending limit**

The cardholder's monthly spending limit is the maximum dollar amount authorized for a cardholder within a 30-day period. It is replenished automatically the day after the billing date. The monthly spending limit is \$10,000.00 for individual cards and \$25,000.00 for the agency card.

The APA noted 43 agency purchasing cards with monthly spending limits different than that set out in the Purchasing Card Manual. The table below provides a breakdown of agency purchasing cards with monthly spending limits different than that set out in the Purchasing Card Manual:

Agency	Monthly Spending Limit	Number of Cards
DCS	\$15,000	4
State Treasurer	\$15,000	1
DAS	\$20,000	2
Department of Transportation	\$20,000	4
Department of Transportation (formerly Aeronautics)	\$20,000	1
DCS	\$20,000	10
DHHS	\$20,000	2
Department of Insurance	\$20,000	1
Game & Parks	\$20,000	1
DCS	\$30,000	6
DED	\$35,000	1
Department of Revenue	\$50,000	2
DAS	\$100,000	1
Game & Parks	\$100,000	7
<b>Total</b>		<b>43</b>

The Purchasing Card Manual lacks sufficient information to allow for a determination as to whether higher spending limits are allowed. Likewise, the manual provides no guidance for determining when the increased limits are necessary. The manual is similarly silent regarding whether the spending limits are to be retained indefinitely or made available only for special circumstances.

### ***Holders of Cards***

During the review of cards used after an employee's termination – see Comment and Recommendation Number 4 – the APA was informed that DAS currently allows cards to be “checked out” to individuals other than the employees to whom they were issued.

Though not expressly prohibiting this practice, the Purchasing Card Manual states, “Agencies are allowed a purchasing card for all individuals who are required to make purchases in the normal course of their job.” The APA believes the restrictive use of these cards to the designated

cardholder is implied. Furthermore, the practice of loaning the card to other employees not only defeats the purpose of issuing purchasing cards to a specific individual but also increases the risk of loss, theft, or misuse of funds.

### ***Acceptable Purchases***

DAS does not provide adequate guidelines, either through the Purchasing Card Manual or the State Accounting Manual, for the acceptable uses of purchasing cards. Consequently, the APA selected multiple transactions for testing – see Comment and Recommendation Number 6 – but, due to the lack of any sound criteria, was unable to determine whether they were appropriate.

In addition to the directive in § 81-118.02(6), which had been addressed previously herein, good internal controls, as well as sound accounting and business practices, require procedures and policies to provide detailed guidance regarding the allowable uses, holders, issuance, activity, and limits of purchasing cards.

We recommend DAS update the Purchasing Card Manual and develop rules and regulations, as directed by State statute, that would provide sufficient guidance to the users of purchasing cards.

*DAS Response: DAS-State Accounting will review the Purchasing Card Manual and update as necessary to enhance guidance for purchasing card users.*

*Game and Parks Response: We suspect that we are the primary reason “Utility” cards exist and we are thankful that DAS chose to implement them for our unique circumstances. The use of the Purchase Card to cover utility costs in several of our remote locations that have local (and sometimes out-of-state) utility providers has proven to be quite beneficial in ensuring bills are processed in a timely fashion. Timing of billings, mailings, and processing prior to the “utility card” often resulted in late charges or service shut off, due to logistical constraints of some remote locations. The two cards assigned to one area appears to be a coding error in Workday. We will continue to monitor their use and assignment in cooperation and adherence to DAS policies.*

### **3. Unauthorized Cardholders**

The APA identified 43 purchasing cards that were held by unauthorized personnel, as detailed in the following table:

<b>Cards Held by an Agency Location</b>	<b>36</b>
Unknown Address Book Number	5
No Employee Associated with Card	5
Terminated Employee Cards	8
Current Employee Cards	18
<b>Cards Held by Other Individuals</b>	<b>3</b>
Contract Worker	1
Vendor	1
Temporary Employee	1
<b>Card Held by Different Agency than Employee</b>	<b>4</b>
<b>Total Unauthorized Cardholders</b>	<b>43</b>

**Note:** 41 cards remained open at June 30, 2017.

### ***Cards Held by an Agency Location***

The APA found 36 purchasing cards that were held under the name of an agency location instead of the name of an individual. Thirty-three of those cards were at the Department of Health & Human Services (DHHS). One card was at the Game & Parks Commission (Game & Parks), and two others were at the Nebraska State Patrol (State Patrol). As of June 30, 2017, the two State Patrol cards had been closed; however, they were used during the fiscal year. There were also two DHHS cards that had not been used during the fiscal year, but remained open at fiscal year end.

Per discussion with DAS staff, the purchasing cards should be assigned to an active employee's address book number within that agency. An employee address book number is a unique identifier assigned to each State employee in the State accounting system. Nevertheless, the APA identified the following when analyzing the purchasing cards under agency locations and the assigned address book numbers:

- Five cards could not be associated with a facility or employee's address book number.
- Five cards had address book numbers tied to a facility and not an employee.
- Eight cards had address book numbers associated with terminated employees.
- The remaining 18 cards were associated with current individual employees based on their address book number.

The Purchasing Card Manual states, "All cards are issued at the request of an agency in an employee's name."

The APA also noted that there were four agency location cards that were under the address book number of employees who have multiple cards.

Account Name	Organization Name	Account Number	Address Book Number
<b><i>Employee 1</i></b>			
CSA HASTINGS	DHHS	**6340	1776704
CSA KEARNEY	DHHS	**6332	1776704
Employee 1 Name	DHHS	**1572	1776704
<b><i>Employee 2</i></b>			
NORTHERN SERVICE AREA	DHHS	**1630	110297
NSA DAKOTA CITY	DHHS	**6373	110297
NSA NORFOLK	DHHS	**6365	110297
<b><i>Employee 3</i></b>			
WESTERN SERVICE AREA	DHHS	**7716	125855
WSA ALLIANCE	DHHS	**6407	125855
WSA MCCOOK	DHHS	**3870	125855
WSA NORTH PLATTE	DHHS	**3854	125855
WSA OGALLALA	DHHS	**6399	125855
<b><i>Employee 4</i></b>			
FT ROBINSON INN REST	Game & Parks	**3588	125494
Employee 4 Name	Game & Parks	**3229	125494

Additionally, two terminated employees had purchasing cards under DHHS; however, those individuals were actually employed by the Department of Correctional Services.

Good internal control and sound accounting practices require that all agencies be in compliance with the provisions of the Purchasing Card Manual. When cards are issued in the name of an agency location, instead of the name of an individual employee, there is an increased risk for the loss or misuse of State funds.

We recommend DAS allow purchasing cards to be opened only in an employee's name, as specified in the Purchasing Card Manual. We further recommend DAS close cards currently existing under agency locations and reissue them, as needed, in the names of specific employees. Finally, we recommend closing cards associated with terminated employees.

*DAS Response: DAS-State Accounting will review the Purchasing Card Manual and make appropriate modifications, and take appropriate actions, where deemed necessary.*

*Game and Parks Response: While we don't disagree that the DAS manual as well as our own could be reviewed and made more specific in some areas, it is difficult to always predict where unique circumstances/needs arise. The use of 'checked out' cards is another example where circumstances dictate need at some of our locations. Due to the nature of our business (i.e. seasonal) we maintain only skeleton crews on a permanent basis in some locations and add seasonal staff to the ranks during peak operational periods. A day's activities and involvement of a particular staff members expertise could render them unavailable to travel to town for a needed purchase in a timely fashion, thus 'checking a card out' to another employee seems reasonable and appropriate as well as efficient. Every effort is made to ensure the system is monitored and working as intended and the practice is limited.*

*As for a card being issued to a location, i.e. the Ft Robinson Inn Restaurant, rather than an employee, that is a factor of conflicting rules. The Ft. Rob restaurant has a state sanctioned liquor license, issued in the name of the restaurant and all alcohol purchases must be paid at time of delivery by the license holder. We were instructed by the parties involved in the liquor regulatory realm that having a card in the name of the location would facilitate the operation. As noted, an onsite employee is also named on the card and is [sic] held responsible for all transactions.*

*State Patrol Response: The State Patrol will add procedures to ensure that all purchasing cards issued are in the name of the employee.*

### ***Cards Held by Other Individuals***

The APA identified three purchasing cards that were held by individuals who could not be identified as current full-time State employees, as follows:

- One individual was identified as a former employee of the State; however, his employment terminated on October 16, 2013, and the purchasing card in question was not opened until February 11, 2014. The individual is currently a contractor for the Office of the Chief Information Officer.
- One individual could not be identified as having ever been employed by the State. As explained above, the Purchasing Card Manual requires all purchasing cards to be issued in an employee's name.

- One individual was a temporary State employee. Although issued in an employee's name, cards should not be issued to employees who are only temporary.

Good internal control and sound accounting practices require that all agencies be in compliance with the provisions of the Purchasing Card Manual. Additionally, when cards are issued to individuals who are not full-time employees of the State, there is an increased risk for the loss or misuse of State funds.

We recommend DAS allow purchasing cards to be opened only for State employees, as required by the Purchasing Card Manual. Additionally, we recommend only full-time State employees be issued purchasing cards.

*DAS Response: DAS-State Accounting will review the Purchasing Card Manual and make appropriate modification where deemed necessary.*

#### ***Cards Held by Different Agency than Employee***

There were three employees who had cards associated with an agency that was different then the agency they currently worked for.

<b>Card Organization Name</b>	<b>Account Number</b>	<b>Cardholder Agency</b>	<b>Card Holder Position</b>
DAS State Building Division	**0993	DHHS	Staff Assistant I
DAS State Building Division	**3467	DHHS	Safety Coordinator
DAS State Building Division	**5730	Department of Labor	Boiler Inspector

Good internal control and sound accounting practices require purchasing cards to be opened under the agency with which the cardholder is employed.

We recommend DAS develop procedures to ensure all purchasing cards are opened under the agency with which the cardholder is employed. We further recommend the cards identified in this comment be assigned to the correct agencies.

*DAS Response: DAS-State Accounting will review the Purchasing Card Manual and make appropriate modifications, and take appropriate actions, where deemed necessary.*

*DAS-State Building Division will review Purchasing Cards assigned to employees and make appropriate changes if deemed necessary.*

#### **4. Cards Open and Used After Termination**

##### ***Open Cards***

The APA identified 25 purchasing cards that, at June 30, 2017, had an "Open" status; however, the employees in whose names those cards were issued had previously been terminated. Those cards remained active from 22 to 1,456 days after termination of the cardholders. The following table provides more details regarding the cards at issue:

Agency Name	Account Number	Date Terminated	Days Open after Termination (At June 30, 2017)
Game & Parks Commission (Game & Parks)	**3833	6/8/2017	22
Department of Health & Human Services (DHHS)	**4664	6/2/2017	28
Department of Transportation (DOT)	**1703	6/2/2017	28
DHHS	**0029	6/1/2017	29
DHHS	**9241	4/28/2017	63
Department of Correctional Services	**6620	3/22/2017	100
DOT	**1820	3/1/2017	121
DOT	**3142	2/3/2017	147
DOT	**1514	1/20/2017	161
DHHS	**9596	12/23/2016	189
Game & Parks	**8922	12/15/2016	197
Game & Parks	**1487	10/7/2016	266
DHHS	**5714	8/17/2016	317
Department of Administrative Services (DAS)	**6076	7/29/2016	336
DOT	**1871	7/8/2016	357
DHHS	**4366	5/13/2016	413
Military Department	**4567	4/28/2016	428
DOT	**1779	3/8/2016	479
DOT	**1747	2/11/2016	505
Game & Parks	**3022	1/3/2016	544
DOT	**8176	9/1/2015	668
DOT	**0093	6/1/2015	760
DHHS	**5474	2/6/2015	875
DOT	**2007	1/23/2015	889
Military Department	**3860	7/5/2013	1,456

### *Used After Termination*

The APA found eight purchasing cards that were used for expenditures of \$100 or more after the cardholders had terminated employment with the State. As of June 30, 2017, the purchases made on these eight cards totaled \$17,617.70. Of the transactions on those cards, the APA selected 30 for additional testing. We noted that 27 of those 30 transactions, totaling \$7,976.95 from seven of the cards, occurred after employment was terminated and, therefore, were made by employees other than the designated cardholders. These instances included other employees' signing off on receipts, invoices in other employees' names, and purchased items being sent to the Agency's location. The table below provides more information regarding the items tested:

Card Number	Agency	Termination Date	Vendor	Date of Purchase	Amount	Days After Termination
**5425	DAS	9/23/2016	Sherwin Williams	10/18/2016	\$374.01	25
**5425	DAS	9/23/2016	Menards <b>Note 1</b>	10/19/2016	\$202.94	26
**5425	DAS	9/23/2016	Old Hwy 6 Tractor and Equipment	11/3/2016	\$189.39	41
**5425	DAS	9/23/2016	Menards <b>Note 1</b>	11/17/2016	\$244.15	55
**5934	DAS	9/16/2016	Triple K Irrigation	9/19/2016	\$63.22	3
**5934	DAS	9/16/2016	Menards	9/27/2016	\$198.40	11
**5934	DAS	9/16/2016	Menards	9/30/2016	\$8.73	14
**5748	DAS	4/12/2017	Menards	4/26/2017	\$432.69	14
**5748	DAS	4/12/2017	Landmark Implement	4/26/2017	\$400.00	14
**5748	DAS	4/12/2017	Orscheln	5/17/2017	\$319.99	35
**5748	DAS	4/12/2017	Echo Electric Supply	5/24/2017	\$356.16	42

Card Number	Agency	Termination Date	Vendor	Date of Purchase	Amount	Days After Termination
**5748	DAS	4/12/2017	Maverick Industries	5/19/2017	\$1,440.78	37
**5991	DAS	11/28/2016	NAPA Auto Parts	12/21/2016	\$230.64	23
**5991	DAS	11/28/2016	Anderson Auto Group	12/21/2016	\$127.46	23
**5991	DAS	11/28/2016	Baxter Chrysler Dodge	1/12/2017	\$255.60	45
**5991	DAS	11/28/2016	O'Reilly Auto	1/31/2017	\$329.97	64
**5991	DAS	11/28/2016	Lincoln Clutch and Brake	2/13/2017	\$232.44	77
**4350	DAS	7/22/2016	Graham Tire	7/26/2016	\$214.60	4
**4350	DAS	7/22/2016	Cross Dillon Tire	7/28/2016	\$260.44	6
**4350	DAS	7/22/2016	Graham Tire	7/26/2016	\$326.20	4
**4350	DAS	7/22/2016	Graham Tire	8/29/2016	\$294.36	38
**4350	DAS	7/22/2016	Cross Dillon Tire	8/31/2016	\$444.44	40
**0189	DHHS	1/27/2017	Amazon	2/6/2017	\$7.99	10
**0189	DHHS	1/27/2017	CARF International	2/9/2017	\$471.00	13
**0189	DHHS	1/27/2017	Humane Restraint Co.	2/13/2017	\$311.50	17
**0189	DHHS	1/27/2017	Zenni Optical	2/14/2017	\$35.85	18
**8666	DHHS	6/3/2016	SurveyMonkey.com	10/10/2016	\$204.00	129
<b>Total</b>					<b>\$7,976.95</b>	

**Note 1:** The APA noted that rebates were given on these cards. As purchases were made after termination, the APA did not confirm whether these rebates were redeemed.

Neb. Rev. Stat. § 81-118.02(5) (Cum. Supp. 2016) provides the following:

*Upon the termination or suspension of employment of an individual using a state purchasing card, such individual's state purchasing card account shall be immediately closed and he or she shall return the state purchasing card to the department or agency from which it was obtained.*

Failure to close a purchasing card account immediately after the termination of the cardholder's employment not only contravenes State law but also increases the risk of loss, theft, or misuse of funds.

We recommend the implementation of procedures to ensure all purchasing card accounts are closed promptly after termination of the cardholder's employment. Additionally, we recommend DAS review the cards identified in this comment to ensure appropriate action is taken with regard to their apparent misuse.

*DAS Response: DAS will review agency's off-boarding processes and procedures and modify where deemed necessary.*

*Game and Parks Response: As an agency that is recognized as a major user of the state purchasing card program, we make concerted efforts to keep our staff trained and informed of procurement rules and procedures and follow the guidelines provided by DAS. We will continue to follow DAS's lead in these matters and appreciate their cooperation in identifying and accommodating unique circumstances that materialize from time to time. While our routine review of all transactions and handling of known anomalies is thought to be adequate, we are aware that not all situations will be identified all the time. We will continue to review our processes and address the incidences that were brought to our attention in this review, as well as work with DAS to make appropriate updates to our guidance documents.*

*NDCS Response: NDCS procedures address P-Cards to be closed promptly after termination of a cardholder's employment. The applicable employee's account has been closed, and these procedures have been reviewed with staff.*

*DHHS Response: The Agency will develop and implement a standard operating procedure that ensures state purchasing cards associated with terminated or suspended employees are immediately closed, destroyed, and returned to Financial Services. Additionally, the Agency will review the cards identified in the report to ensure appropriate action is taken with regard to their apparent misuse.*

*NDOT Response: NDOT concurs with the recommendation. It is NDOT's policy to have the Manager collect and destroy the employee's procurement card upon termination, and process a DR Form 409 to the Controller Office. The policy will be reviewed with all Managers.*

## 5. Split Transactions

Multiple agencies failed to review purchasing card transactions adequately to ensure that the single-transaction spending limit set out in the Purchasing Card Manual was not improperly circumvented by splitting large single transactions into multiple smaller, less expensive ones. The following table provides a summary of agencies with purchasing card transactions in excess of the single-transaction spending limit; however, instead of obtaining DAS approval for a higher spending limit, they ran the purchases as two or more separate transactions.

Managing Account Name	Instances of Splitting	Transaction Amount	Amount Over Limit
Game & Parks Commission	29	\$88,397.25	\$22,397.25
Department of Transportation (DOT)	25	\$63,033.44	\$13,033.44
Commission for the Blind & Visually Impaired	3	\$15,110.38	\$6,110.38
Department of Correctional Services	6	\$19,857.24	\$2,362.24
Department of Administrative Services (DAS) State Building Division	4	\$9,911.47	\$1,911.47
Department of Health & Human Services (DHHS)	2	\$5,598.48	\$1,598.48
Department of Motor Vehicles	1	\$6,552.70	\$1,552.70
DAS Transportation Services Bureau	1	\$2,898.79	\$898.79
Military Department	1	\$2,422.29	\$422.29
<b>Totals</b>	<b>72</b>	<b>\$213,782.04</b>	<b>\$50,287.04</b>

The Purchasing Card Manual contains the following:

*The single-purchase restricts the amount of any single purchase made by a cardholder. It can be comprised of a single or multiple items purchased at one time at a single supplier. The single-purchase limit is \$2,000.00 for individual cards and \$5,000.00 for the agency card.*

The transactions at issue were split in two different ways. Some were divided into two or more separate transactions after they were initially declined. For instance, the APA note a transaction for \$2,058.51 that was declined twice due to the purchase exceeding the account's single-transaction spending limit of \$2,000. The APA then observed the transaction go through with two transactions: one for \$1,000 and the other for the remaining \$1,058.51. Those purchases are shown in the table below:

Managing Account Name	Account Number	Date	Declined Amount	Approved Amount	Single Purchase Limit	Amount Over Limit
DOT	**9644	12/19/2016	\$2,058.51			
DOT	**9644	12/19/2016	\$2,058.51			
<b>Declined Transaction Amount</b>			<b>\$2,058.51</b>			
DOT	**9644	12/19/2016		\$1,058.51		
DOT	**9644	12/19/2016		\$1,000.00		
<b>Approved Transaction Total</b>				<b>\$2,058.51</b>	<b>\$2,000.00</b>	<b>\$58.51</b>

The second method involved the cardholder knowing beforehand that the transaction would not be processed because the purchase price exceeded the single-transaction spending limit. For example, the APA observed two purchasing card transactions that totaled \$3,938.22. Because the single-transaction spending limit for the card was \$2,000, this purchase would have been denied had it been attempted as one transaction. Instead, the purchase went through as two separate transactions: one for \$1,979.81 and the other for \$1,958.41. Those purchases are detailed in the table below:

Managing Account Name	Account Number	Date	Amount	Single Purchase Limit	Amount Over Limit
Game & Parks Commission	**1536	6/9/2017	\$1,979.81		
Game & Parks Commission	**1536	6/9/2017	\$1,958.41		
<b>Game &amp; Parks Commission</b>	<b>**1536</b>	<b>6/9/2017</b>	<b>\$3,938.22</b>	<b>\$2,000.00</b>	<b>\$1,938.22</b>

The remainder of the split transactions found by the APA are summarized in **Exhibits C** and **D**.

The APA also identified a split transaction during testing of certain documents at the Department of Transportation. There were two purchases on February 3, 2017, from Skidril Industries LLC, one for \$1,999 and the other for \$585 from sequential numbered invoices. The employee's single purchase limit was \$2,000. Other split transactions may exist that were not identified.

Good internal control and sound accounting practices require agencies to comply with the single-transaction spending limits set out in the Purchasing Card Manual. When such spending limits are disregarded, there is an increased risk for the loss or misuse of State funds.

We recommend agencies implement review procedures to ensure that large single transactions are not split into multiple smaller purchases in order to circumvent the single-transaction spending limit set out in the Purchasing Card Manual.

*DAS Response: DAS will examine current procedures for the review of purchase card transactions and modify where deemed necessary.*

*Game and Parks Response: As an agency that is recognized as a major user of the state purchasing card program, we make concerted efforts to keep our staff trained and informed of procurement rules and procedures and follow the guidelines provided by DAS. We will continue to follow DAS's lead in these matters and appreciate their cooperation in identifying and accommodating unique circumstances that materialize from time to time. While our routine review of all transactions and handling of known anomalies is thought to be adequate, we are*

*aware that not all situations will be identified all the time. We will continue to review our processes and address the incidences that were brought to our attention in this review, as well as work with DAS to make appropriate updates to our guidance documents.*

*NDCS Response: Item # 39 in exhibit D itemizes three transactions under account 7206. These transactions were three separate purchase orders at two different facilities, and were mailed to the different facilities. The two transactions for one of facilities did not exceed the single purchase limit.*

*For the remaining transactions where it appears that splitting occurred, NDCS will review these with the cardholders as appropriate.*

*DHHS Response: The Agency will update the State Purchasing Card Training Manual to include split-transactions as a disallowed item, and provide examples. The Agency will notify all purchasing cardholders that splitting transactions is disallowed, and require all cardholders to review the updated training manual. The Agency will ensure that reviewers are properly trained to ensure that large transactions are not split into multiple smaller purchases in order to circumvent the single-transaction spending limit.*

*NDOT Response: NDOT concurs with the recommendation, and will review procedures to follow the State Purchasing Card Manual.*

*NCBVI Response: NCBVI will better document approvals for raising spending limits as well as unblocking of card transactions in the future. The transactions noted were approved by the agency, but documentation was not specifically received and saved to verify the approval.*

*DMV Response: Thank you for the opportunity to respond to your “Draft” audit finding regarding the DMV’s use of a Purchasing Card under Recommendation #5 Split Transactions. The attached documents will show that the purchases were made for two separate invoices the first, Invoice number SAVE-374196 dated 11/18/2016 for \$3,134.50 and the second, Invoice number SAVE-375520 dated 12/15/2016 for \$3,415.50. When the second invoice was delivered, it was clear that payment for the first invoice had not been made. While on the phone with the United State Department of Homeland Security, we processed payments for each invoice in separate transactions on the same phone call. Procedures are now in place to make sure that there are no late payments. This will prevent the appearance that payments are being split.*

## **6. Unauthorized Transactions**

The APA selected for testing the 50 purchasing card transactions noted by Agency in the following table:

<b>Agency</b>	<b>Number of Transactions Selected</b>
Department of Health & Human Services (DHHS)	17
Department of Correctional Services (DCS)	9
Commission for the Blind & Visually Impaired	7
Department of Administrative Services (DAS)	3
Department of Economic Development	3

Agency	Number of Transactions Selected
Department of Education	3
Game & Parks Commission (Game & Parks)	3
Arts Council	1
Board of Engineers & Architects	1
Department of Insurance	1
Department of Transportation (DOT)	1
State Patrol	1
<b>Total</b>	<b>50</b>

During our testing, we noted the following issues with the purchasing card transactions:

- For 11 transactions, the purchases were deemed to be unreasonable or unnecessary.
- For one transaction, the item was purchased for personal use.
- For two transactions, sales tax was paid incorrectly – see Comment and Recommendation Number 8.
- For one transaction, the purchase exceeded the single-transaction limit set out in the Purchasing Card Manual and was split into multiple transactions – see Comment and Recommendation Number 5.
- There were also multiple transactions that the APA could not effectively evaluate due to a lack of regulations by DAS – see Comment and Recommendation Number 2.

Neb. Rev. Stat. § 81-118.02(6) (Cum. Supp. 2016) states, in relevant part, “No officer or employee of the state shall use a state purchasing card for any unauthorized use as determined by the department by rule and regulation.”

### ***Unreasonable Purchases***

The following purchasing card transactions were deemed to be either unreasonable or necessary, or both:

- The State Patrol sent nine employees to a conference. Instead of paying the registration fee of \$200 per registrant, the State Patrol purchased a \$2,500 sponsorship, which secured a 10-person table for the luncheon and conference sessions. Therefore, as illustrated by the table below, the State Patrol paid \$700 more than needed:

Registrants	Cost per Registrant	Total Cost	Total Paid	Variance
9	\$200.00	\$1,800.00	\$2,500.00	<b>\$(700.00)</b>

The Purchasing Card Manual states, in relevant part, that the cardholder has the responsibility to “[p]urchase only the number of items, at the quantity and quality needed.”

- DAS State Building Division purchased \$57 flowers as a “Get Well Soon” gift for an employee. Such purchases are normally considered to be an inappropriate use of State funds.

The Purchasing Card Manual states, in relevant part, that unacceptable uses of purchasing cards include “[a]ny merchant, product, or service normally considered to be inappropriate use of State funds.”

- Game & Parks made a purchase that, according to the receipt, included a \$25 Home Depot gift card as a promotional item. The agency was unable to find any record or documentation of the gift card having been received or used.
- DHHS purchased a \$35 gift card as an “Employee of the Month” recognition award. DHHS does have an employee recognition plan; however, this plan was not approved by DAS as required by Nebraska Personnel Rules and Regulations.

Title 273 Nebraska Administrative Code (NAC) 18-001 states, in relevant part, “With the approval of the Director of Personnel, DAS State Personnel Division, agencies may implement Employee Recognition programs...”

- DHHS rented movies from Redbox and lost one of them, resulting in a charge of \$25.50.
- DHHS had an employee purchase Victoria Secret RAPTURE Cologne Spray for \$46 as a “Staff for Santa” gift. The purchase was coded to a donation trust fund; however, the purchase should not have been made on a purchasing card.
- Per the US Bank Transaction listing the DCS and the DOT received promotional rebates on purchases from Sears. It appears both failed to utilize the rebates, resulting in the loss of those promotional monies to the State.
- DCS purchased \$2,348 of food for staff during an inmate disturbance emergency. The food was purchased from Casey’s General Store over a three-day period. No itemized receipts could be provided for the purchases.

Neb. Rev. Stat § 81-118.02(4) (Cum. Supp. 2016) states the following:

*An itemized receipt for purposes of tracking expenditures shall accompany all state purchasing card purchases. In the event that an itemized receipt does not accompany such a purchase, the Department of Administrative Services shall have the authority to temporarily or permanently suspend state purchasing card purchases in accordance with rules and regulations adopted and promulgated by the department.*

In addition, the State Accounting Manual, Policy AM-005, Travel Policies, Section 8, “Receipts,” states, in relevant part, “Detailed receipts are required as support for all expenditures . . . . The requirement to provide detailed receipts includes, but is not limited to, food/meals . . . .”

- DCS provided donuts and cookies at a correctional facility for an employee recognition event at the end of each month. At the time of testing, the Department did not have an employee recognition program that was approved by DAS, as required by Nebraska Personnel Rules and Regulations. The Department sent the APA the approval after receiving the draft letter.

Title 273 Nebraska Administrative Code (NAC) 18-001 states, in relevant part, “With the approval of the Director of Personnel, DAS State Personnel Division, agencies may implement Employee Recognition programs...”

- One DCS employee used the State purchasing card, instead of a personal credit card, to pay for a meal. The employee has reimbursed the State for the cost of the meal.

In addition to § 81-118.02(6), which prohibits using a purchasing card “for any unauthorized use as determined by the department by rule and regulation,” the Purchasing Card Manual states flatly, “Under no circumstances can a card be used for personal use.”

Good internal control requires purchase made with a purchasing card to be reasonable and necessary. Without such controls, there is an increased risk for the loss or misuse of State funds.

We recommend all agencies review their employees’ purchasing card transactions to ensure they are reasonable and necessary and not personal in nature.

*DAS Response: DAS currently has a procedure in place to request and secure a sales tax refund through the filing of Nebraska Form 7 – Claim for Refund of Sales and Use Tax with the Nebraska Department of Revenue in the event an individual DAS card holder is unable to secure a sales tax exemption at time of sale.*

*Game and Parks Response: As an agency that is recognized as a major user of the state purchasing card program, we make concerted efforts to keep our staff trained and informed of procurement rules and procedures and follow the guidelines provided by DAS. We will continue to follow DAS’s lead in these matters and appreciate their cooperation in identifying and accommodating unique circumstances that materialize from time to time. While our routine review of all transactions and handling of known anomalies is thought to be adequate, we are aware that not all situations will be identified all the time. We will continue to review our processes and address the incidences that were brought to our attention in this review, as well as work with DAS to make appropriate updates to our guidance documents.*

*NDCS Response: As referenced, NDCS issued a policy directive involving rebates. Included in the policy directive is a process for ensuring rebates are used.*

*NDCS will remind staff that original receipts must be maintained for all P-Card purchases.*

*NDCS submitted its policy for employee recognition to AS State Personnel for review and approval.*

*DHHS Response: The Agency does not agree that the purchase of the gift card for employee violated DHHS Policy. The current DHHS Employee Recognition Policy allows for such purchases and received DAS approval on April 4, 2013. The Auditor referenced the employee(s)' lack of knowledge or understanding of the policy, thus this finding appears to be one of insufficient training or knowledge not a policy violation. DHHS acknowledges the training gap and will reinforce current employee training, compliance opportunities, and enforcement policies. The Agency is developing an agency wide compliance audit program and will continue to explore and develop employee training and internal compliance programs. DHHS is committed to strengthen its internal and structural safeguards.*

*NDOT Response: NDOT concurs with the recommendation. NDOT currently has a process in place to review all cardholders purchasing card transactions. A rebate policy will be added to the NDOT procurement manual.*

*State Patrol Response: By statute, the State Patrol is required to partner and collaborate with Child Advocacy Centers when investigating allegations of child abuse and neglect. Provided below are relevant statutes that are applicable:*

- *28-729. Section (1) requires the formation of a child abuse and neglect investigation team that includes members of law enforcement and child advocacy centers. Section (3) requires that all members of teams must attend child abuse and neglect training on an annual basis, and shall include the roles and responsibilities of child protective services, law enforcement agencies, county attorneys, child advocacy centers, the Attorney General and judges.*
- *28-728. Specifically (3)(d)(iii) states that law enforcement must arrange for forensic interviews to be conducted at Child Advocacy Centers for children who are three to eighteen years of age and are alleged to be victims of sexual abuse or serious physical abuse or neglect, have witnessed a violent crime, are found in a drug-endangered environment, or have been recovered from a kidnapping.*
- *28-713. Duty of law enforcement to investigate the report of child abuse.*
- *81-2004 (1) (2). The State Patrol to enforce laws relating to felonies.*
- *81-2010.02. The State Patrol must provide assistance to local law enforcement in rural areas for child abuse investigations.*

*Project Harmony is an incredible resource that the Nebraska State Patrol relies heavily on in the Omaha metro area in the arena of forensic interviews. They have a full staff of certified forensic interview personnel and have access to additional resources if needed. All of the practices they are using have been upheld in the state and federal court systems. The Nebraska State Patrol, Troop A, located in Omaha, utilizes them for forensic interviews free of charge, saving the agency approximately \$3,000-\$5,000 annually. The average cost of a forensic interview is approximately \$581.60, and the medical examination costs approximately \$622.52. Project Harmony frequently offers State Patrol employees free training and equipment that can be quite costly. For example, the State Patrol recently sent an investigator to an interview school, which was paid for by Project Harmony at a cost of \$500. Project Harmony on average spends approximately \$3,000 to help train the State Patrol, Troop A, personnel in this area.*

*It is the opinion of the State Patrol that participating in a sponsorship with Project Harmony has resulted in a strong partnership with them, that has resulted in many benefits and cost savings for the Agency and the State of Nebraska, such as those noted above.*

## **7. Excess Airline Agency Cards**

During the fiscal year ended June 30, 2017, there were 70 agency purchasing cards at 31 agencies that were authorized to purchase airline tickets. Of those 70, only 13 cards were held by the Director of the agency. The other 57 cards were held by employees, who should not have had the authority to make such purchases, according to the Purchasing Card Manual. The airline ticket purchases made with those 57 cards are detailed in the table below:

<b>Managing Account Name</b>	<b>Number of Cards</b>	<b>Airline Ticket Purchases</b>
Department of Economic Development	1	\$39,090.63
Corn Board	1	\$30,848.62
Department of Health & Human Services	6	\$20,857.28
Commission for the Blind & Visually Impaired	1	\$20,469.28
Department of Insurance	1	\$16,933.55
Department of Agriculture	14	\$14,981.87
Supreme Court	1	\$12,747.47
Department of Education	3	\$10,363.81
Game & Parks Commission	5	\$8,077.05
Department of Administrative Services (DAS)	6	\$5,966.95
Department of Banking & Finance	1	\$4,601.76
Library Commission	1	\$3,792.66
Arts Council	1	\$3,077.30
Historical Society	1	\$3,038.40
Board of Engineers & Architects	1	\$2,875.20
Workers' Compensation Court	1	\$2,795.03
Public Service Commission	1	\$2,762.08
Investment Council	2	\$2,701.62
Department of Correctional Services	1	\$2,157.25
Board of Parole	1	\$1,902.76
Department of Veterans' Affairs	2	\$1,821.27
State Fire Marshall	1	\$1,810.20
Tourism Commission	1	\$1,467.00
Public Board of Accountancy	1	\$1,170.40
Department of Revenue	1	\$620.46
Energy Office	1	\$422.20
<b>Totals</b>	<b>57</b>	<b>\$217,352.10</b>

**Note:** This listing does not include airline ticket purchases made by agency Directors.

The Purchasing Card Manual states, “Each agency is allowed only one card that can be used for purchasing airline tickets and this card should be issued to the Director.”

Thus, each of the 31 agencies that purchased airline tickets should have only one card with that authorization. A summary of those 31 agencies is provided in the following table:

Director holds purchasing card and purchased airline tickets – others not allowed to purchase airline tickets	5
Director holds purchasing card and purchased airline tickets – others also allowed to purchase airline tickets	8
Director holds purchasing card – others allowed to purchase airline tickets	3
Director holds no purchasing card – others allowed to purchase airline tickets	15

The agencies identified above were not in compliance with the Purchasing Card Manual's requirements regarding the use of purchasing cards for airline tickets. Such noncompliance increases the risk of loss or misuse of State funds.

We recommend DAS review all purchasing cards for the authority to purchase airline tickets. We also recommend enforcing the rules of the Purchasing Card Manual by only issuing agency Directors cards with the ability to purchase airline tickets.

*DAS Response: DAS-State Accounting will review the Purchasing Card Manual and make appropriate modifications, and take appropriate actions, where deemed necessary.*

*NDCS Response: NDCS is reviewing all purchasing cards for the authority to purchase airline tickets. Only the P-Card issued to the NDCS Director would have the ability to purchase airline tickets.*

*Education Response: We believe it is not reasonable for the Commissioner of Education to approve all airline travel for the organization and thus the Commissioner has delegated that responsibility to the Director of Finance for the Department of Education. Additionally, airline travel only occurs for out of state travel which requires approval by the Commissioner or a Deputy Commissioner before it can be booked. We will have the authority of the two other P-Cards used to purchase airline tickets modified so that they can no longer purchase airline tickets. We believe these controls are functioning properly and are sufficient to control the purchase of airline tickets.*

## **8. Sales Tax Paid**

Using the reporting feature from US Bank, the APA was able to receive a listing of all agency purchasing card payments for fiscal year 2017. In reviewing this report, the APA noted 1,873 transactions that included the payment of sales tax to a Nebraska vendor. The APA reviewed these transactions and noted 1,487 for which the improperly paid sales tax was not subsequently refunded by the vendor. The sales tax paid on all of these transactions totaled \$24,372.90. The table below details the sales taxes paid by agency:

Agency	Number of Cards	Number of Transactions	Sales Tax Paid
Department of Transportation	143	534	\$6,705.34
Game & Parks Commission	113	289	\$5,194.84
Department of Administrative Services (DAS) State Building Division	14	42	\$4,119.12
Department of Health & Human Services	34	245	\$3,990.32

Agency	Number of Cards	Number of Transactions	Sales Tax Paid
DAS Transportation Services Bureau	2	23	\$1,198.16
Department of Correctional Services	36	91	\$1,046.29
DAS Office of the Capitol Commission	6	36	\$524.28
Military Department	9	23	\$433.60
Department of Agriculture	19	52	\$241.41
Department of Transportation (formerly Aeronautics)	6	89	\$226.17
Commission for the Blind & Visually Impaired	7	9	\$120.10
Natural Resources Commission	1	11	\$117.43
Public Service Commission	2	7	\$102.74
Educational Telecommunications Commission	4	6	\$93.60
Foster Care Review Office	2	6	\$76.46
Department of Insurance	1	2	\$38.73
State Electrical Division	1	1	\$35.06
State Fire Marshall	1	2	\$17.97
Arts Council	1	1	\$16.36
Department of Education	2	3	\$14.03
Department of Revenue	2	3	\$5.36
Attorney General	1	1	\$4.66
Department of Motor Vehicles	1	2	\$3.36
Nebraska Public Employees Retirement Systems	1	1	\$2.49
Library Commission	1	1	\$2.04
Board of Engineers & Architects	1	1	\$1.54
DAS Director's Office	1	2	\$1.22
State Patrol	1	1	\$0.84
Board of Parole	1	1	\$0.65
<b>Totals</b>	<b>414</b>	<b>1,485</b>	<b>\$24,334.17</b>

**Note:** Due to the number of transactions including sales tax per US Bank, the APA did not verify the accuracy of each transaction listed.

In addition, during testing of 50 unusual transactions – see Comment and Recommendation Number 6 – the APA noted an additional three transactions, totaling \$17.68, for which sales tax was paid; however, these were not included in the above table, as the US Bank report did not split-out the tax from the total purchase amount.

Furthermore, the APA noted 17 transactions, not included in the table above, for which the US Bank report indicated sales tax in an amount larger than the total transaction amount. This appears to be a reporting error, and DAS did not have any policies in place requiring review of the transactions to ensure no State sales tax was paid.

Neb. Rev. Stat. § 77-2704.15(1)(a) (Cum. Supp. 2016) states, in relevant part, “Sales and use taxes shall not be imposed on the gross receipts from the sale, lease, or rental of and the storage, use, or other consumption in this state of purchases by the state . . . .”

Additionally, the Purchasing Card Manual states, in relevant part, “Since the State of Nebraska is exempt from paying Nebraska sales tax, no sales tax should be charged on purchases made in Nebraska . . . .”

We recommend DAS implement procedures requiring agencies to review their purchasing card transactions to ensure sales tax is not being paid inappropriately. Additionally, we recommend DAS perform a periodic review of the US Bank report reflecting purchasing card transactions that include sales tax, and follow up with agencies that inappropriately pay sales tax.

*DAS Response: DAS-State Accounting will review the Purchasing Card Manual and make appropriate modifications, and take appropriate actions, where deemed necessary.*

*NDCS Response: NDCS procedure provides for review of P-Card transactions, including sales tax.*

*State Patrol Response: The State Patrol will review purchasing card transactions to ensure sales tax is not being paid inappropriately.*

*Education Response: We will review our policies and procedures around sales tax on P-Card purchases and send out a note to our P-Card holders reminding them that sales tax is not to be paid to Nebraska Vendors.*

## 9. Inactive Cards

As of June 30, 2017, the APA noted 70 purchasing cards that, based upon the last transaction date from US Bank, had not been used for periods ranging from 372 to 1,947 days. An additional eight purchasing cards had last transaction dates within the fiscal year; however, upon review of US Bank records, there appeared to be no activity for those eight cards during the fiscal year. The table below details the lack of activity for the purchasing cards in question:

Organization Name	Account Number	Open Date (Note 1)	Last Date of Transaction (Note 2)	Days Since Last Use (Note 4)
Department of Transportation (DOT) (1)	**1522	3/2/2012	Note 3	1,947
DOT	**1445	3/2/2012	Note 3	1,947
Department of Correctional Services (DCS)	**4450	3/9/2012	Note 3	1,940
DCS	**1966	3/9/2012	9/4/2012	1,761
Military Department	**3860	3/9/2012	12/17/2012	1,657
Department of Education	**9923	10/30/2013	Note 3	1,340
DCS	**1537	2/19/2014	Note 3	1,228
Department of Administrative Services (DAS) State Building Division	**5730	3/5/2012	5/5/2014	1,153
Department of Health & Human Services (DHHS)	**9059	6/7/2012	7/18/2014	1,079
DCS (1)	**1095	8/20/2014	Note 3	1,046
Game & Parks Commission (1) (Game & Parks)	**0446	3/2/2012	8/22/2014	1,044
DOT (1)	**1689	9/4/2014	Note 3	1,031
DOT (1)	**1598	9/4/2014	11/3/2014	971
DOT	**1412	3/2/2012	12/17/2014	927
DOT (1)	**9661	12/18/2014	Note 3	926
DOT (1)	**9999	12/22/2014	Note 3	922
DOT	**2007	3/2/2012	1/9/2015	904
DOT	**1474	3/2/2012	1/19/2015	894
Game & Parks	**4162	3/2/2012	2/4/2015	878

Organization Name	Account Number	Open Date (Note 1)	Last Date of Transaction (Note 2)	Days Since Last Use (Note 4)
DAS State Building Division	**5474	3/5/2012	2/6/2015	876
Game & Parks	**1487	3/2/2012	2/12/2015	870
Game & Parks (1)	**0120	3/2/2012	2/13/2015	869
DOT	**0680	9/25/2012	2/26/2015	856
DHHS	**1581	3/5/2012	3/9/2015	845
DOT (1)	**0093	3/2/2012	3/25/2015	829
Game & Parks	**1529	3/2/2012	3/30/2015	824
DCS (1)	**0690	8/26/2014	4/30/2015	793
Game & Parks (1)	**3022	3/2/2012	5/18/2015	775
Military Department (1)	**2891	6/15/2015	Note 3	747
Department of Education (1)	**8332	3/3/2015	7/27/2015	705
DOT	**1514	3/2/2012	8/4/2015	697
DHHS	**5942	5/9/2013	8/31/2015	670
Historical Society	**5902	3/9/2012	9/15/2015	655
DCS (1)	**9798	6/12/2015	9/21/2015	649
DHHS (1)	**1556	6/1/2015	9/22/2015	648
DCS (1)	**7129	9/1/2015	9/28/2015	642
DCS (1)	**9519	3/24/2015	9/29/2015	641
DHHS	**1579	3/5/2012	10/1/2015	639
Office of the Chief Information Officer (1)	**7197	5/12/2014	10/23/2015	617
DCS (1)	**9033	10/29/2015	Note 3	611
DHHS (1)	**4366	12/4/2014	11/5/2015	604
DOT (1)	**8176	3/2/2012	11/9/2015	600
DHHS	**1840	3/5/2012	11/17/2015	592
DAS State Personnel Division	**4343	3/9/2012	11/25/2015	584
DHHS	**5821	8/27/2013	12/18/2015	561
DCS (1)	**9009	10/29/2015	1/5/2016	543
DOT	**1747	3/2/2012	1/22/2016	526
DHHS (1)	**6879	1/27/2016	Note 3	521
DCS	**1984	3/9/2012	1/28/2016	520
Office of the Capitol Commission	**6076	3/5/2012	1/29/2016	519
DHHS (1)	**1597	3/5/2012	2/3/2016	514
Military Department (1)	**5341	3/9/2012	2/5/2016	512
DHHS	**1832	3/5/2012	3/14/2016	474
Office of the Capitol Commission (1)	**8839	12/21/2015	3/21/2016	467
DOT	**1779	3/2/2012	3/25/2016	463
Military Department	**4567	3/9/2012	3/30/2016	458
DOT	**1466	3/2/2012	4/5/2016	452
Office of the Chief Information Officer	**3953	3/9/2012	4/14/2016	443
DOT (1)	**3813	4/15/2016	Note 3	442
DHHS (1)	**9596	4/20/2016	Note 3	437
DHHS	**1570	3/5/2012	5/5/2016	422
DOT	**1871	3/2/2012	5/5/2016	422
DHHS (1)	**5312	3/5/2012	5/10/2016	417
DAS Task Force for Building Renewal (1)	**2285	4/28/2015	5/20/2016	407
State Patrol (1)	**4460	3/21/2013	5/30/2016	397
DOT	**1940	3/2/2012	6/9/2016	387
DOT	**2015	3/2/2012	6/10/2016	386
DOT	**3783	8/4/2015	6/17/2016	379
DCS (1)	**8227	3/9/2012	6/23/2016	373
DAS State Building Division (1)	**3404	3/27/2015	6/24/2016	372
Foster Care Review Office	**7705	11/16/2012	7/1/2016	365 (2)

Organization Name	Account Number	Open Date (Note 1)	Last Date of Transaction (Note 2)	Days Since Last Use (Note 4)
DHHS	**4502 (3)	2/20/2015	8/8/2016	327 (2)
DHHS	**4510 (3)	2/20/2015	8/8/2016	327 (2)
DHHS	**9649 (3)	3/5/2012	10/13/2016	261 (2)
Department of Agriculture (1)	**7034	1/27/2016	1/18/2017	164 (2)
DHHS	**7313 (3)	6/1/2015	2/21/2017	130 (2)
DOT	**3523 (3)	3/21/2014	6/14/2017	17 (2)
Oil & Gas Conservation Commission	**4244	3/9/2012	6/19/2017	12 (2)

**Note 1:** The “Open Date” appears to be based on the original date that a card was issued. Therefore, if a prior card was lost, stolen, or closed due to fraud, the original “Open Date” was not changed when its replacement was issued.

**Note 2:** The APA determined that the “Last Transaction Date” obtained from the US Bank’s website was not always accurate and, therefore, could not be relied upon to determine when cards had last been used during the fiscal year.

**Note 3:** These cards have not been used since they were opened. The date noted is the date the card was issued.

**Note 4:** These dates were calculated as of June 30, 2017.

**(1):** The card did not have any actual activity during the year; however, there were declined transactions on the card.

**(2):** The last transaction date is shown as being within the fiscal year; however, based on the full transaction listing obtained from the US Bank’s website, the card had no activity during the fiscal year. It is unknown, therefore, when the card was actually last used.

**(3):** This card was not used during the fiscal year; however, another card under the cardholder was used during the fiscal year – see **Note 1**.

The Purchasing Card Manual states, “Agencies are allowed a purchasing card for all individuals who are required to make purchases in the normal course of their job.” However, when purchasing cards are not used for a significant time, the APA questions whether cards are being issued in compliance with the manual.

According to DAS personnel, moreover, no monitoring is performed on purchasing cards that have not been used, as it would fall to the agency to notify DAS if a card needed to be closed. The Purchasing Card Manual does not make this clear, however. Thus, agencies would likely be unaware that inactive cards should be closed.

Good internal controls and sound business practice require policies and procedures to ensure that purchasing cards are issued only to employees who require them for their job duties. Additionally, good internal controls require procedures to ensure that cards are monitored for activity, and any inactive cards are closed.

We recommend DAS implement policies and procedures to ensure purchasing cards are issued only to employees who need them for their job duties. Additionally, we recommend DAS and agencies review the listing of inactive purchasing cards in order to determine which ones should be closed.

*DAS Response: DAS will examine current procedures for the review of active and inactive purchase card transactions and modify where deemed necessary.*

*DAS-State Accounting will review the Purchasing Card Manual and make appropriate modifications, and take appropriate actions, where deemed necessary.*

*NDCS Response: NDCS is reviewing all of its current P-Cards and usage to determine if there is a need for the P-Cards.*

*State Patrol Response: The State Patrol has taken steps to close out the inactive card. The Agency will periodically review the need for all open purchasing cards, and close out those that are not needed.*

*Education Response: The card noted will be deactivated. We will also be reviewing our procedures and looking at setting a time limit on inactivity before we have a card deactivated.*

\* \* \* \* \*

Our audit procedures are designed primarily on a test basis and, therefore, may not bring to light all weaknesses in policies or procedures that may exist. Our objective is, however, to use our knowledge of the agencies and their interaction with other State agencies and administrative departments gained during our work to make comments and suggestions that we hope will be useful to the agencies.

This interim communication is intended solely for the information and use of management, the Governor and State Legislature, and others within these State agencies. It is not intended to be, and should not be, used by anyone other than the specified parties. However, this letter is a matter of public record, and its distribution is not limited.

If you have any questions regarding the above information, please contact our office.

Sincerely,



Philip J. Olsen, CPA, CISA  
Audit Manager

DAS – Purchasing Cards  
Purchasing Card Totals by Agency  
FYE 6/30/2017

**Exhibit A**

Agency	Number of Cards	Cleared Transaction Amount	Declined Transaction Amount
<i>DAS Accounting Division</i>	1	\$9,962.79	\$9,004.00
<i>DAS Budget Division</i>	3	\$2,628.39	\$10,485.56
<i>DAS Task Force for Building Renewal</i>	3	\$5,997.72	\$22,391.86
<i>Office of the Capitol Commission</i>	23	\$143,162.54	\$85,273.49
<i>DAS Director's Office</i>	4	\$24,264.73	\$38,339.64
<i>DAS Employee Relations Division</i>	1	\$264.00	\$3,034.00
<i>DAS Materiel Division</i>	1	\$18,033.77	\$4,657.00
<i>Office of the Chief Information Officer</i>	11	\$99,213.81	\$63,388.92
<i>DAS State Building Division</i>	66	\$655,794.54	\$246,326.88
<i>DAS State Personnel Division</i>	1	\$16,792.97	\$25,213.52
<i>DAS Transportation Services Bureau</i>	7	\$60,399.70	\$41,267.03
Total Department of Administrative Services	121	\$1,036,514.96	\$549,381.90
Department of Transportation (formerly Aeronautics)	13	\$116,165.32	\$66,000.33
Department of Agriculture	68	\$166,307.08	\$535,335.87
Arts Council	1	\$25,427.79	\$4,571.16
Attorney General	1	\$59,028.65	\$33,251.30
Auditor of Public Accounts	2	\$888.27	\$5,874.95
Department of Banking & Finance	1	\$19,141.03	\$6,607.10
Board of Barber Examiners	1	\$1,111.30	\$60.52
Commission for the Blind & Visually Impaired	14	\$151,108.75	\$85,457.91
Brand Committee	1	\$4,040.09	\$1,548.94
Corn Board	4	\$82,907.90	\$29,578.91
Department of Correctional Services	197	\$1,988,551.96	\$1,257,973.16
Commission for the Deaf & Hard of Hearing	1	\$10,055.94	\$2,348.48
Department of Economic Development	4	\$141,786.65	\$64,185.47
Department of Education	29	\$170,043.28	\$144,941.68
Educational Telecommunications Commission	17	\$72,105.14	\$70,483.50
State Electrical Division	1	\$34,997.72	\$16,874.61
Energy Office	1	\$1,991.35	\$20,031.30
Board of Engineers & Architects	1	\$31,549.97	\$3,034.00
Equal Opportunity Commission	1	\$11,799.42	\$19,623.60
Ethanol Board	2	\$4,202.78	\$8,788.53
State Fire Marshall	3	\$28,472.00	\$9,814.93
Foster Care Review Office	10	\$13,417.50	\$36,525.95
Game & Parks Commission	285	\$3,088,665.41	\$938,530.31
Board of Geologists	1	\$268.84	\$3,034.00
Governor's Office	4	\$19,069.87	\$11,156.82
Department of Health & Human Services	187	\$1,340,479.38	\$1,122,534.03
Historical Society	13	\$54,300.98	\$25,165.79
Commission of Industrial Relations	2	\$825.05	\$6,144.31
Department of Insurance	4	\$64,504.97	\$39,027.07
Investment Council	4	\$18,164.94	\$4,751.34
Department of Labor	4	\$31,832.78	\$43,731.99
Board of Landscape Architects	1	\$6,171.99	\$4,273.12
Latino American Commission	1	\$445.00	\$3,034.00
Commission on Law Enforcement & Criminal Justice	1	\$19,491.30	\$11,089.60
Legislative Council	1	\$5,419.21	\$0.00
Library Commission	3	\$31,707.02	\$18,188.01
Military Department	17	\$232,588.04	\$103,239.17
Department of Motor Vehicles	3	\$40,953.44	\$13,564.53

DAS – Purchasing Cards  
Purchasing Card Totals by Agency  
FYE 6/30/2017

**Exhibit A**

Agency	Number of Cards	Cleared Transaction Amount	Declined Transaction Amount
Department of Natural Resources	1	\$61,123.30	\$19,877.54
Board of Parole	1	\$43,069.44	\$15,272.73
Public Board of Accountancy	2	\$10,173.33	\$9,534.37
Nebraska Public Employees Retirement Systems	1	\$8,122.52	\$4,341.26
Public Service Commission	4	\$54,254.98	\$64,372.28
Real Estate Commission	1	\$1,417.47	\$1,898.95
Real Property Appraiser Board	1	\$3,344.99	\$209.01
Department of Revenue	10	\$210,100.73	\$164,320.51
Department of Transportation	482	\$5,122,521.80	\$1,925,631.70
Secretary of State	2	\$966.31	\$18,200.17
State Patrol	9	\$92,393.32	\$37,797.81
State Treasurer	5	\$39,149.20	\$36,764.24
Supreme Court	3	\$84,533.92	\$13,428.08
Tourism Commission	2	\$28,733.59	\$18,282.83
Department of Veterans' Affairs	6	\$34,706.34	\$24,893.40
Workers' Compensation Court	1	\$25,368.53	\$14,170.61
Nebraska Oil and Gas Conservation Commission	1	\$2,157.44	\$4,429.12
<b>Totals</b>	<b>1,557</b>	<b>\$14,948,640.28</b>	<b>\$7,693,182.80</b>

DAS – Purchasing Cards  
Purchasing Card Totals by Vendor (Over \$15,000)  
FYE 6/30/2017

Exhibit B

Merchant Name (APA)	Transaction Amount
Walmart	\$533,507.58
Amazon	\$493,479.77
Menards	\$470,247.43
WW Grainger	\$242,205.49
Wick's Sterling Trucks	\$217,912.06
United States Postal Service	\$214,094.43
Cornhusker International	\$187,932.73
Bomgaars	\$172,849.23
Norris Public Power District	\$159,253.85
Kimball Midwest	\$124,406.56
Northeast Nebraska Public Power District	\$115,993.29
NAPA Auto Parts	\$113,479.90
Truck Center Companies	\$110,162.56
United Airlines	\$107,499.53
Home Depot	\$102,400.21
Inland Truck Parts & Service	\$99,564.58
Titan Machinery	\$96,448.43
O'Reilly Auto Parts	\$91,618.67
Carquest Auto Parts	\$91,222.47
Ace Hardware	\$90,516.94
Dultmeier Sales	\$87,034.40
Certified Power	\$84,560.20
Orscheln Farm & Home	\$82,998.88
Kelly Supply Company	\$82,104.96
Southwest Airlines	\$78,691.08
Facebook	\$70,862.52
Nebraska Machinery Company (NMC)	\$70,605.08
Delta Airlines	\$67,447.44
Road Builders Machinery & Supply	\$65,224.38
Holiday Inn Hotels	\$62,715.75
City of Fremont Department	\$62,204.18
Fastenal	\$59,815.87
Bob Barker Company, Inc.	\$55,958.85
Tractor Supply Company	\$55,218.43
Hilton Hotels & Resorts	\$52,166.91
Dawson Public Power District	\$51,152.31
McKesson Medical-Surgical	\$50,043.49
Matheson	\$48,396.74
State Chemical Solutions	\$47,600.44
American Airlines	\$47,190.88
Murphy Tractor & Equipment Co.	\$44,904.67
Hyatt Hotels	\$44,067.78
Sun Mart Foods	\$43,959.47
Lawson Products	\$43,951.73
Moore Equipment Co.	\$42,695.91
Nebraska Truck Center	\$42,330.61
Bobcat Equipment & Attachments	\$42,043.00
Mariott Hotels	\$41,888.44
Monroe Truck Equipment	\$41,256.67
Plains Equipment Group	\$40,611.38
Johnson Hardware	\$40,554.86
Shur-Tite Products	\$39,829.27

DAS – Purchasing Cards  
Purchasing Card Totals by Vendor (Over \$15,000)  
FYE 6/30/2017

Exhibit B

Merchant Name (APA)	Transaction Amount
Embassy Suites	\$39,390.61
Best Buy	\$38,544.25
Winnelson Supply Co.	\$38,288.61
Hy-Vee	\$38,154.61
Weldon Parts	\$38,024.95
Sherwin-Williams	\$36,724.02
Niobrara Valley Electric	\$36,034.99
Rockmount Research	\$34,585.03
Burlington Finance Center	\$33,925.26
True Value Hardware Stores	\$33,889.25
Crescent Electric Supply Co.	\$32,296.85
DISH Network	\$31,904.56
Scheels All Sports	\$30,607.75
Cabela's	\$30,568.81
B & H Photo Video	\$30,310.92
Lincoln Pro Baseball	\$30,000.00
Scott Van Keppel (Scott Equipment)	\$29,957.87
ULINE Shipping Supplies	\$29,951.07
Lowe's Home Improvement	\$29,905.05
Delaney Meeting & Event Management	\$29,415.00
Diamond Vogel: Paint Store	\$29,256.98
Nebraska Equipment Inc.	\$28,380.91
Interstate All Battery Center	\$28,288.11
Floyd's Truck Center	\$27,456.47
Northern Tool + Equipment	\$27,419.78
Colonial Research Chemical	\$27,302.08
Cross Dillon Tire Pros	\$26,683.50
Varidesk	\$26,280.00
Dennis Supply Company	\$25,140.76
Sunbelt Rentals	\$25,082.58
Johnstone Supply	\$24,985.33
Schaeffer Manufacturing Co.	\$24,876.19
TransitWorks	\$24,761.12
IBI Supplyworks	\$24,545.24
Graham Tire	\$24,380.72
Rosen Hotels & Resorts	\$24,178.24
Henderson Products	\$24,055.50
APPEARA	\$23,958.18
Twin Valleys Public Power District	\$23,752.65
Central States Hydraulic Inc.	\$23,713.61
Landmark Implement	\$22,976.26
WebrestaurantStore	\$22,773.89
Hansen International	\$22,598.40
Microdynamics	\$22,021.00
Heilbruns Auto Parts	\$22,000.40
FIMCO Industries Ag Spray	\$21,927.58
Hamilton Equipment Co.	\$21,830.86
Sandberg Implement Inc.	\$21,737.84
Hampton Inn & Suites	\$21,451.96
Omaha Public Power District	\$21,351.37
JW Marriott Hotels	\$21,151.77
Southern Public Power District	\$20,973.00

DAS – Purchasing Cards  
Purchasing Card Totals by Vendor (Over \$15,000)  
FYE 6/30/2017

Exhibit B

Merchant Name (APA)	Transaction Amount
Nebraska-Iowa Industrial Fastener Corporation	\$20,907.60
Wheat Belt Public Power District	\$20,788.89
Herren Brothers	\$20,644.00
Motorola	\$20,483.32
Anderson Auto Group	\$20,470.29
Hotsy Equipment Co.	\$19,962.46
Thermo King Global	\$19,914.54
Rivers Metal Products	\$19,832.07
Dakota Fluid Power	\$19,798.41
Contractors Materials	\$19,267.08
American Safety & Health Institute	\$19,230.27
Auto Value	\$19,126.42
FORCE America Distributing	\$18,764.91
Kubota of Omaha	\$18,686.47
Seals & Services Inc.	\$18,656.17
Mark's Plumbing Parts	\$18,610.28
McMaster-Carr	\$18,201.53
Trausch Dynamics	\$18,128.43
SupplyWorks	\$18,029.15
Ainsworth Auto Parts	\$17,977.42
Colin Electric Motor Service, Inc.	\$17,930.60
Sears	\$17,790.20
Peitz GMC-Service Inc.	\$17,626.58
Forestry Suppliers, Inc.	\$17,570.43
Wilson Tool Service LLC	\$17,445.16
Concrete Industries	\$17,436.38
Craftmaster Hardware	\$17,293.27
TESSCO Technologies, Inc.	\$17,266.70
Kearney Glass	\$17,146.17
America Digital Accessories	\$17,002.31
21st Century Equipment	\$16,965.68
Seiler Instrument	\$16,955.38
GlobalIndustrial.com	\$16,785.98
Small Engine Specialists	\$16,698.73
Musician's Friend	\$16,330.10
Perennial Public Power District	\$16,257.29
KRIHA - Fluid Power	\$16,159.91
Stutheit Implement Co.	\$16,110.45
Trans Iowa Equipment	\$15,949.27
Indeed	\$15,908.31
Paul's Repair	\$15,874.46
CHEMSEARCH	\$15,845.46
4imprint	\$15,320.00
Nebraska State Bar Association	\$15,119.40
Meltwater	\$15,000.00
Viaero Center	\$15,000.00
<i>Other Vendors – 6,027</i>	<i>\$7,055,718.32</i>
<b>Total</b>	<b>\$14,948,640.28</b>

DAS – Purchasing Cards  
Declined then Split Transactions  
FYE 6/30/2017

Exhibit C

Transaction Number	Managing Account Name	Account Number	Date	Decline Reason Explanation	Declined Amount	Approved Amount	Single Purchase Limit	Amount Over Limit
1	Commission for the Blind & Visually Impaired	**4824	7/12/2016	Exceeded account single trans limit	\$5,180.38			
	Commission for the Blind & Visually Impaired	**4824	7/12/2016	Exceeded account single trans limit	\$10,180.38			
	<b>Declined Transaction Amount</b>				<b>\$10,180.38</b>			
	Commission for the Blind & Visually Impaired	**4824	7/12/2016			\$5,000.00		
	Commission for the Blind & Visually Impaired	**4824	7/12/2016			\$5,000.00		
	Commission for the Blind & Visually Impaired	**4824	7/12/2016			\$180.38		
	<b>Approved Transaction Total</b>					<b>\$10,180.38</b>	<b>\$5,000.00</b>	<b>\$5,180.38</b>
2	Game & Parks Commission	**3892	4/12/2017	Exceeded account single trans limit	\$2,230.00			
	Game & Parks Commission	**3892	4/12/2017	Exceeded account single trans limit	\$2,230.00			
	Game & Parks Commission	**3892	4/12/2017	Exceeded account single trans limit	\$2,230.00			
	<b>Declined Transaction Amount</b>				<b>\$2,230.00</b>			
	Game & Parks Commission	**3892	4/12/2017			\$1,130.00		
	Game & Parks Commission	**3892	4/12/2017			\$1,100.00		
	<b>Approved Transaction Total</b>					<b>\$2,230.00</b>		
	Game & Parks Commission	**3892	4/12/2017			\$1,365.00		
	Game & Parks Commission	**3892	4/12/2017			\$370.92		
	Game & Parks Commission	**3892	4/12/2017			\$298.28		
	<b>Approved Transaction Grand Total</b>					<b>\$4,264.20</b>	<b>\$2,000.00</b>	<b>\$2,264.20</b>
3	Game & Parks Commission	**3833	10/28/2016	Exceeded account single trans limit	\$2,800.00			
	<b>Declined Transaction Amount</b>				<b>\$2,800.00</b>			
	Game & Parks Commission	**3833	10/28/2016			\$1,400.00		
	Game & Parks Commission	**3833	10/28/2016			\$1,400.00		
	<b>Approved Transaction Total</b>					<b>\$2,800.00</b>		
	Game & Parks Commission	**3833	10/28/2016			\$475.00		
	Game & Parks Commission	**3833	10/28/2016			\$475.00		
	<b>Approved Transaction Grand Total</b>					<b>\$3,750.00</b>	<b>\$2,000.00</b>	<b>\$1,750.00</b>
4	Game & Parks Commission	**1980	8/10/2016	Exceeded account single trans limit	\$3,634.51			
	<b>Declined Transaction Amount</b>				<b>\$3,634.51</b>			
	Game & Parks Commission	**1980	8/10/2016			\$1,825.76		
	Game & Parks Commission	**1980	8/10/2016			\$1,808.75		
	<b>Approved Transaction Total</b>					<b>\$3,634.51</b>	<b>\$2,000.00</b>	<b>\$1,634.51</b>
5	DAS Transportation Services Bureau	**4350	2/10/2017	Account coded V9	\$2,898.79			
	<b>Declined Transaction Amount</b>				<b>\$2,898.79</b>			
	DAS Transportation Services Bureau	**2426	2/13/2017			\$458.88		
	DAS Transportation Services Bureau	**2426	2/13/2017			\$446.96		
	DAS Transportation Services Bureau	**2426	2/13/2017			\$444.44		
	DAS Transportation Services Bureau	**2426	2/13/2017			\$344.16		
	DAS Transportation Services Bureau	**2426	2/13/2017			\$285.36		
	DAS Transportation Services Bureau	**2426	2/13/2017			\$279.98		
	DAS Transportation Services Bureau	**2426	2/13/2017			\$225.06		
	DAS Transportation Services Bureau	**2426	2/13/2017			\$145.61		

DAS – Purchasing Cards  
Declined then Split Transactions  
FYE 6/30/2017

Exhibit C

Transaction Number	Managing Account Name	Account Number	Date	Decline Reason Explanation	Declined Amount	Approved Amount	Single Purchase Limit	Amount Over Limit
	DAS Transportation Services Bureau	**2426	2/13/2017			\$142.68		
	DAS Transportation Services Bureau	**2426	2/13/2017			\$125.66		
	<b>Approved Transaction Total</b>					<b>\$2,898.79</b>	<b>\$2,000.00</b>	<b>\$898.79</b>
6	Department of Correctional Services	**1974	5/26/2017	Exceeded account single trans limit	\$2,800.00			
	Department of Correctional Services	**1974	5/26/2017	Exceeded account single trans limit	\$2,800.00			
	<b>Declined Transaction Amount</b>				<b>\$2,800.00</b>			
	Department of Correctional Services	**1974	5/26/2017			\$1,000.00		
	Department of Correctional Services	**1974	5/26/2017			\$800.00		
	Department of Correctional Services	**1974	5/26/2017			\$700.00		
	Department of Correctional Services	**1974	5/26/2017			\$300.00		
	<b>Approved Transaction Total</b>					<b>\$2,800.00</b>	<b>\$1,999.00</b>	<b>\$801.00</b>
7	Game & Parks Commission	**1980	9/30/2016	Exceeded account single trans limit	\$2,786.77			
	<b>Declined Transaction Amount</b>				<b>\$2,786.77</b>			
	Game & Parks Commission	**1980	9/30/2016			\$2,000.00		
	Game & Parks Commission	**1980	9/30/2016			\$786.77		
	<b>Approved Transaction Total</b>					<b>\$2,786.77</b>	<b>\$2,000.00</b>	<b>\$786.77</b>
8	DAS State Building Division	**1151	5/10/2017	Exceeded account single trans limit	\$2,546.10			
	<b>Declined Transaction Amount</b>				<b>\$2,546.10</b>			
	DAS State Building Division	**1151	5/10/2017			\$1,697.40		
	DAS State Building Division	**1151	5/10/2017			\$848.70		
	<b>Approved Transaction Total</b>					<b>\$2,546.10</b>		
	DAS State Building Division	**1151	5/10/2017			\$54.49		
	<b>Approved Transaction Grand Total</b>					<b>\$2,600.59</b>	<b>\$2,000.00</b>	<b>\$600.59</b>
9	Department of Transportation	**9644	12/29/2016	Exceeded account single trans limit	\$2,298.85			
	<b>Declined Transaction Amount</b>				<b>\$2,298.85</b>			
	Department of Transportation	**9644	12/30/2016			\$1,298.85		
	Department of Transportation	**9644	12/30/2016			\$1,000.00		
	<b>Approved Transaction Total</b>					<b>\$2,298.85</b>	<b>\$2,000.00</b>	<b>\$298.85</b>
10	Department of Transportation	**9644	9/19/2016	Exceeded account single trans limit	\$2,244.57			
	<b>Declined Transaction Amount</b>				<b>\$2,244.57</b>			
	Department of Transportation	**9644	9/19/2016			\$943.20		
	Department of Transportation	**9644	9/19/2016			\$820.08		
	Department of Transportation	**9644	9/19/2016			\$481.29		
	<b>Approved Transaction Total</b>					<b>\$2,244.57</b>	<b>\$2,000.00</b>	<b>\$244.57</b>
11	Game & Parks Commission	**6429	12/2/2016	Exceeded account single trans limit	\$2,242.50			
	<b>Declined Transaction Amount</b>				<b>\$2,242.50</b>			
	Game & Parks Commission	**6429	12/2/2016			\$1,380.00		
	Game & Parks Commission	**6429	12/2/2016			\$862.50		
	<b>Approved Transaction Total</b>					<b>\$2,242.50</b>	<b>\$2,000.00</b>	<b>\$242.50</b>
12	Game & Parks Commission	**1334	11/2/2016	Exceeded account single trans limit	\$2,226.64			

DAS – Purchasing Cards  
Declined then Split Transactions  
FYE 6/30/2017

**Exhibit C**

Transaction Number	Managing Account Name	Account Number	Date	Decline Reason Explanation	Declined Amount	Approved Amount	Single Purchase Limit	Amount Over Limit
	Declined Transaction Amount				\$2,226.64			
	Game & Parks Commission	**1334	11/2/2016			\$1,685.69		
	Game & Parks Commission	**1334	11/2/2016			\$540.95		
	Approved Transaction Total					\$2,226.64	\$2,000.00	\$226.64
13	DAS State Building Division	**7626	12/29/2016	Exceeded account single trans limit	\$2,129.32			
	Declined Transaction Amount				\$2,129.32			
	DAS State Building Division	**7626	12/30/2016			\$1,602.38		
	DAS State Building Division	**7626	12/30/2016			\$526.94		
	Approved Transaction Total					\$2,129.32	\$2,000.00	\$129.32
	14	Department of Transportation	**1988	11/14/2016	Exceeded account single trans limit	\$2,125.46		
Department of Transportation		**1988	11/14/2016	Exceeded account single trans limit	\$2,125.46			
Department of Transportation		**1988	11/14/2016	Exceeded account single trans limit	\$2,125.46			
Department of Transportation		**1988	11/14/2016	Exceeded account single trans limit	\$2,125.46			
Declined Transaction Amount				\$2,125.46				
Department of Transportation		**1988	11/14/2016			\$2,000.00		
Department of Transportation		**1988	11/14/2016			\$125.46		
Approved Transaction Total					\$2,125.46	\$2,000.00	\$125.46	
15	Department of Transportation	**8485	2/15/2017	Exceeded account single trans limit	\$2,090.63			
	Department of Transportation	**8485	2/15/2017	Exceeded account single trans limit	\$2,090.63			
	Declined Transaction Amount				\$2,090.63			
	Department of Transportation	**8485	2/15/2017			\$1,000.00		
	Department of Transportation	**8485	2/16/2017			\$1,090.63		
	Approved Transaction Total					\$2,090.63	\$2,000.00	\$90.63
16	Department of Transportation	**9644	12/19/2016	Exceeded account single trans limit	\$2,058.51			
	Department of Transportation	**9644	12/19/2016	Exceeded account single trans limit	\$2,058.51			
	Declined Transaction Amount				\$2,058.51			
	Department of Transportation	**9644	12/19/2016			\$1,058.51		
	Department of Transportation	**9644	12/19/2016			\$1,000.00		
	Approved Transaction Total					\$2,058.51	\$2,000.00	\$58.51
17	DAS State Building Division	**1151	5/19/2017	Exceeded account single trans limit	\$2,025.60			
	Declined Transaction Amount				\$2,025.60			
	DAS State Building Division	**1151	5/19/2017			\$1,025.60		
	DAS State Building Division	**1151	5/19/2017			\$1,000.00		
	Approved Transaction Total					\$2,025.60	\$2,000.00	\$25.60
Totals						\$52,357.32		\$15,358.32

DAS – Purchasing Cards  
Split Transactions  
FYE 6/30/2017

**Exhibit D**

Transaction Number	Managing Account Name	Account Number	Date	Amount	Single Purchase Limit	Amount Over Limit
<b>1</b>	Game & Parks Commission	**3031	12/15/2016	\$3,895.00		
	Game & Parks Commission	**3031	12/15/2016	\$1,055.00		
	Game & Parks Commission	**3031	12/15/2016	\$975.00		
	Game & Parks Commission	**3031	12/15/2016	\$660.00		
	Game & Parks Commission	**3031	12/15/2016	\$650.00		
	Game & Parks Commission	**3031	12/15/2016	\$325.00		
	Game & Parks Commission	**3031	12/15/2016	\$325.00		
	<b>Game &amp; Parks Commission</b>	<b>**3031</b>	<b>12/15/2016</b>	<b>\$7,885.00</b>	<b>\$5,000.00</b>	<b>\$2,885.00</b>
<b>2</b>	Game & Parks Commission	**1536	6/9/2017	\$1,979.81		
	Game & Parks Commission	**1536	6/9/2017	\$1,958.41		
	<b>Game &amp; Parks Commission</b>	<b>**1536</b>	<b>6/9/2017</b>	<b>\$3,938.22</b>	<b>\$2,000.00</b>	<b>\$1,938.22</b>
<b>3</b>	Department of Transportation	**6682	2/1/2017	\$2,875.00		
	Department of Transportation	**6682	2/1/2017	\$2,875.00		
	<b>Department of Transportation</b>	<b>**6682</b>	<b>2/1/2017</b>	<b>\$5,750.00</b>	<b>\$4,000.00</b>	<b>\$1,750.00</b>
<b>4</b>	Department of Motor Vehicles	**8229	12/21/2016	\$3,415.50		
	Department of Motor Vehicles	**8229	12/21/2016	\$3,137.20		
	<b>Department of Motor Vehicles</b>	<b>**8229</b>	<b>12/21/2016</b>	<b>\$6,552.70</b>	<b>\$5,000.00</b>	<b>\$1,552.70</b>
<b>5</b>	Department of Transportation	**6743	7/6/2016	\$1,877.00		
	Department of Transportation	**6743	7/6/2016	\$1,555.62		
	<b>Department of Transportation</b>	<b>**6743</b>	<b>7/6/2016</b>	<b>\$3,432.62</b>	<b>\$2,000.00</b>	<b>\$1,432.62</b>
<b>6</b>	Department of Transportation	**1446	5/5/2017	\$671.87		
	Department of Transportation	**1446	5/5/2017	\$671.87		
	Department of Transportation	**1446	5/5/2017	\$671.87		
	Department of Transportation	**1446	5/5/2017	\$671.87		
	Department of Transportation	**1446	5/5/2017	\$671.87		
	<b>Department of Transportation</b>	<b>**1446</b>	<b>5/5/2017</b>	<b>\$3,359.35</b>	<b>\$2,000.00</b>	<b>\$1,359.35</b>
<b>7</b>	Game & Parks Commission	**1439	7/3/2016	\$1,759.78		
	Game & Parks Commission	**1439	7/3/2016	\$1,566.96		
	<b>Game &amp; Parks Commission</b>	<b>**1439</b>	<b>7/3/2016</b>	<b>\$3,326.74</b>	<b>\$2,000.00</b>	<b>\$1,326.74</b>
<b>8</b>	Game & Parks Commission	**3833	9/28/2016	\$1,207.48		
	Game & Parks Commission	**3833	9/28/2016	\$1,189.49		
	Game & Parks Commission	**3833	9/28/2016	\$857.93		
	<b>Game &amp; Parks Commission</b>	<b>**3833</b>	<b>9/28/2016</b>	<b>\$3,254.90</b>	<b>\$2,000.00</b>	<b>\$1,254.90</b>
<b>9</b>	Department of Health & Human Services	**6257	9/2/2016	\$819.84		
	Department of Health & Human Services	**6257	9/2/2016	\$819.84		
	Department of Health & Human Services	**6257	9/2/2016	\$819.84		
	Department of Health & Human Services	**6257	9/2/2016	\$741.96		
	<b>Department of Health &amp; Human Services</b>	<b>**6257</b>	<b>9/2/2016</b>	<b>\$3,201.48</b>	<b>\$2,000.00</b>	<b>\$1,201.48</b>
<b>10</b>	DAS State Building Division	**2144	7/18/2016	\$1,689.84		
	DAS State Building Division	**2144	7/18/2016	\$1,689.12		
	DAS State Building Division	**2144	7/18/2016	-\$223.00		
	<b>DAS State Building Division</b>	<b>**2144</b>	<b>7/18/2016</b>	<b>\$3,155.96</b>	<b>\$2,000.00</b>	<b>\$1,155.96</b>
<b>11</b>	Game & Parks Commission	**2098	7/27/2016	\$909.27		
	Game & Parks Commission	**2098	7/27/2016	\$685.23		
	Game & Parks Commission	**2098	7/27/2016	\$519.68		
	Game & Parks Commission	**2098	7/27/2016	\$482.96		
	Game & Parks Commission	**2098	7/27/2016	\$280.52		
	Game & Parks Commission	**2098	7/27/2016	\$78.22		
	Game & Parks Commission	**2098	7/27/2016	\$66.09		
	Game & Parks Commission	**2098	7/27/2016	\$40.48		
	Game & Parks Commission	**2098	7/27/2016	\$37.83		
	Game & Parks Commission	**2098	7/27/2016	\$4.93		

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**Exhibit D**

Transaction Number	Managing Account Name	Account Number	Date	Amount	Single Purchase Limit	Amount Over Limit
	<b>Game &amp; Parks Commission</b>	<b>**2098</b>	<b>7/27/2016</b>	<b>\$3,105.21</b>	<b>\$2,000.00</b>	<b>\$1,105.21</b>
<b>12</b>	Game & Parks Commission	**1550	1/3/2017	\$1,821.00		
	Game & Parks Commission	**1550	1/3/2017	\$1,083.48		
	Game & Parks Commission	**1550	1/3/2017	\$157.37		
	<b>Game &amp; Parks Commission</b>	<b>**1550</b>	<b>1/3/2017</b>	<b>\$3,061.85</b>	<b>\$2,000.00</b>	<b>\$1,061.85</b>
<b>13</b>	Department of Transportation	**1746	6/5/2017	\$1,085.35		
	Department of Transportation	**1746	6/5/2017	\$1,004.75		
	Department of Transportation	**1746	6/5/2017	\$453.43		
	Department of Transportation	**1746	6/5/2017	\$412.12		
	<b>Department of Transportation</b>	<b>**1746</b>	<b>6/5/2017</b>	<b>\$2,955.65</b>	<b>\$2,000.00</b>	<b>\$955.65</b>
<b>14</b>	Department of Transportation	**1789	5/15/2017	\$1,372.40		
	Department of Transportation	**1789	5/15/2017	\$773.64		
	Department of Transportation	**1789	5/15/2017	\$769.36		
	<b>Department of Transportation</b>	<b>**1789</b>	<b>5/15/2017</b>	<b>\$2,915.40</b>	<b>\$2,000.00</b>	<b>\$915.40</b>
<b>15</b>	Game & Parks Commission	**3333	12/14/2016	\$1,478.90		
	Game & Parks Commission	**3333	12/14/2016	\$1,295.46		
	<b>Game &amp; Parks Commission</b>	<b>**3333</b>	<b>12/14/2016</b>	<b>\$2,774.36</b>	<b>\$2,000.00</b>	<b>\$774.36</b>
<b>16</b>	Department of Transportation	**2354	1/27/2017	\$1,935.00		
	Department of Transportation	**2354	1/27/2017	\$800.00		
	<b>Department of Transportation</b>	<b>**2354</b>	<b>1/27/2017</b>	<b>\$2,735.00</b>	<b>\$2,000.00</b>	<b>\$735.00</b>
<b>17</b>	Game & Parks Commission	**2098	6/28/2017	\$784.05		
	Game & Parks Commission	**2098	6/28/2017	\$570.02		
	Game & Parks Commission	**2098	6/28/2017	\$380.96		
	Game & Parks Commission	**2098	6/28/2017	\$332.00		
	Game & Parks Commission	**2098	6/28/2017	\$219.92		
	Game & Parks Commission	**2098	6/28/2017	\$174.31		
	Game & Parks Commission	**2098	6/28/2017	\$159.42		
	Game & Parks Commission	**2098	6/28/2017	\$63.94		
	Game & Parks Commission	**2098	6/28/2017	\$44.56		
	Game & Parks Commission	**2098	6/28/2017	\$4.93		
	<b>Game &amp; Parks Commission</b>	<b>**2098</b>	<b>6/28/2017</b>	<b>\$2,734.11</b>	<b>\$2,000.00</b>	<b>\$734.11</b>
<b>18</b>	Commission for the Blind & Visually Impaired	**6180	5/10/2017	\$1,615.00		
	Commission for the Blind & Visually Impaired	**6180	5/10/2017	\$595.00		
	Commission for the Blind & Visually Impaired	**6180	5/10/2017	\$340.00		
	Commission for the Blind & Visually Impaired	**6180	5/10/2017	\$170.00		
	<b>Commission for the Blind &amp; Visually Impaired</b>	<b>**6180</b>	<b>5/10/2017</b>	<b>\$2,720.00</b>	<b>\$2,000.00</b>	<b>\$720.00</b>
<b>19</b>	Game & Parks Commission	**6429	11/10/2016	\$1,641.48		
	Game & Parks Commission	**6429	11/10/2016	\$1,064.66		
	<b>Game &amp; Parks Commission</b>	<b>**6429</b>	<b>11/10/2016</b>	<b>\$2,706.14</b>	<b>\$2,000.00</b>	<b>\$706.14</b>
<b>20</b>	Department of Transportation	**6743	1/12/2017	\$1,338.50		
	Department of Transportation	**6743	1/12/2017	\$1,338.50		
	<b>Department of Transportation</b>	<b>**6743</b>	<b>1/12/2017</b>	<b>\$2,677.00</b>	<b>\$2,000.00</b>	<b>\$677.00</b>
<b>21</b>	Department of Transportation	**4119	6/14/2017	\$1,984.43		
	Department of Transportation	**4119	6/14/2017	\$663.62		
	<b>Department of Transportation</b>	<b>**4119</b>	<b>6/14/2017</b>	<b>\$2,648.05</b>	<b>\$2,000.00</b>	<b>\$648.05</b>
<b>22</b>	Game & Parks Commission	**2098	8/30/2016	\$763.83		
	Game & Parks Commission	**2098	8/30/2016	\$542.94		
	Game & Parks Commission	**2098	8/30/2016	\$429.92		

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Transaction Number	Managing Account Name	Account Number	Date	Amount	Single Purchase Limit	Amount Over Limit
	Game & Parks Commission	**2098	8/30/2016	\$336.08		
	Game & Parks Commission	**2098	8/30/2016	\$284.56		
	Game & Parks Commission	**2098	8/30/2016	\$95.97		
	Game & Parks Commission	**2098	8/30/2016	\$65.37		
	Game & Parks Commission	**2098	8/30/2016	\$64.35		
	Game & Parks Commission	**2098	8/30/2016	\$36.81		
	Game & Parks Commission	**2098	8/30/2016	\$4.93		
	<b>Game &amp; Parks Commission</b>	<b>**2098</b>	<b>8/30/2016</b>	<b>\$2,624.76</b>	<b>\$2,000.00</b>	<b>\$624.76</b>
<b>23</b>	Department of Transportation	**1853	4/27/2017	\$1,302.23		
	Department of Transportation	**1853	4/27/2017	\$1,298.23		
	<b>Department of Transportation</b>	<b>**1853</b>	<b>4/27/2017</b>	<b>\$2,600.46</b>	<b>\$2,000.00</b>	<b>\$600.46</b>
<b>24</b>	Department of Transportation	**1421	11/21/2016	\$1,682.98		
	Department of Transportation	**1421	11/21/2016	\$568.98		
	Department of Transportation	**1421	11/21/2016	\$328.54		
	<b>Department of Transportation</b>	<b>**1421</b>	<b>11/21/2016</b>	<b>\$2,580.50</b>	<b>\$2,000.00</b>	<b>\$580.50</b>
<b>25</b>	Game & Parks Commission	**6184	7/29/2016	\$1,888.00		
	Game & Parks Commission	**6184	7/29/2016	\$666.00		
	<b>Game &amp; Parks Commission</b>	<b>**6184</b>	<b>7/29/2016</b>	<b>\$2,554.00</b>	<b>\$2,000.00</b>	<b>\$554.00</b>
<b>26</b>	Department of Transportation	**1099	3/13/2017	\$1,422.24		
	Department of Transportation	**1099	3/13/2017	\$1,130.34		
	<b>Department of Transportation</b>	<b>**1099</b>	<b>3/13/2017</b>	<b>\$2,552.58</b>	<b>\$2,000.00</b>	<b>\$552.58</b>
<b>27</b>	Game & Parks Commission	**3031	12/14/2016	\$3,575.00		
	Game & Parks Commission	**3031	12/14/2016	\$1,950.00		
	<b>Game &amp; Parks Commission</b>	<b>**3031</b>	<b>12/14/2016</b>	<b>\$5,525.00</b>	<b>\$5,000.00</b>	<b>\$525.00</b>
<b>28</b>	Game & Parks Commission	**1549	7/5/2016	\$1,265.76		
	Game & Parks Commission	**1549	7/5/2016	\$1,162.03		
	<b>Game &amp; Parks Commission</b>	<b>**1549</b>	<b>7/5/2016</b>	<b>\$2,427.79</b>	<b>\$2,000.00</b>	<b>\$427.79</b>
<b>29</b>	Military Department	**2684	5/4/2017	\$1,806.05		
	Military Department	**2684	5/4/2017	\$359.86		
	Military Department	**2684	5/4/2017	\$256.38		
	<b>Military Department</b>	<b>**2684</b>	<b>5/4/2017</b>	<b>\$2,422.29</b>	<b>\$2,000.00</b>	<b>\$422.29</b>
<b>30</b>	Department of Transportation	**1502	7/21/2016	\$1,208.11		
	Department of Transportation	**1502	7/21/2016	\$1,206.56		
	<b>Department of Transportation</b>	<b>**1502</b>	<b>7/21/2016</b>	<b>\$2,414.67</b>	<b>\$2,000.00</b>	<b>\$414.67</b>
<b>31</b>	Department of Health & Human Services	**9981	3/8/2017	\$799.00		
	Department of Health & Human Services	**9981	3/8/2017	\$799.00		
	Department of Health & Human Services	**9981	3/8/2017	\$799.00		
	<b>Department of Health &amp; Human Services</b>	<b>**9981</b>	<b>3/8/2017</b>	<b>\$2,397.00</b>	<b>\$2,000.00</b>	<b>\$397.00</b>
<b>32</b>	Game & Parks Commission	**1219	5/2/2017	\$1,241.70		
	Game & Parks Commission	**1219	5/2/2017	\$1,151.71		
	<b>Game &amp; Parks Commission</b>	<b>**1219</b>	<b>5/2/2017</b>	<b>\$2,393.41</b>	<b>\$2,000.00</b>	<b>\$393.41</b>
<b>33</b>	Department of Correctional Services	**2706	5/15/2017	\$1,386.75		
	Department of Correctional Services	**2706	5/15/2017	\$981.75		
	Department of Correctional Services	**2706	5/15/2017	\$5,515.75		
	<b>Department of Correctional Services</b>	<b>**2706</b>	<b>5/15/2017</b>	<b>\$7,884.25</b>	<b>\$7,500.00</b>	<b>\$384.25</b>
<b>34</b>	Department of Transportation	**1926	8/23/2016	\$1,330.96		
	Department of Transportation	**1926	8/23/2016	\$1,045.55		
	<b>Department of Transportation</b>	<b>**1926</b>	<b>8/23/2016</b>	<b>\$2,376.51</b>	<b>\$2,000.00</b>	<b>\$376.51</b>
<b>35</b>	Game & Parks Commission	**3833	7/1/2016	\$849.50		
	Game & Parks Commission	**3833	7/1/2016	\$849.50		
	Game & Parks Commission	**3833	7/1/2016	\$575.00		
	Game & Parks Commission	**3833	7/1/2016	\$525.00		
	Game & Parks Commission	**3833	7/1/2016	\$425.00		

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Transaction Number	Managing Account Name	Account Number	Date	Amount	Single Purchase Limit	Amount Over Limit
	Game & Parks Commission	**3833	7/1/2016	-\$849.50		
	<b>Game &amp; Parks Commission</b>	<b>**3833</b>	<b>7/1/2016</b>	<b>\$2,374.50</b>	<b>\$2,000.00</b>	<b>\$374.50</b>
36	Department of Correctional Services	**2007	4/19/2017	\$1,900.00		
	Department of Correctional Services	**2007	4/19/2017	\$467.61		
	<b>Department of Correctional Services</b>	<b>**2007</b>	<b>4/19/2017</b>	<b>\$2,367.61</b>	<b>\$1,999.00</b>	<b>\$368.61</b>
37	Department of Correctional Services	**4519	8/2/2016	\$1,715.00		
	Department of Correctional Services	**4519	8/2/2016	\$650.00		
	<b>Department of Correctional Services</b>	<b>**4519</b>	<b>8/2/2016</b>	<b>\$2,365.00</b>	<b>\$1,999.00</b>	<b>\$366.00</b>
38	Department of Transportation	**7069	10/6/2016	\$1,785.00		
	Department of Transportation	**7069	10/6/2016	\$460.00		
	Department of Transportation	**7069	10/6/2016	\$105.00		
	<b>Department of Transportation</b>	<b>**7069</b>	<b>10/6/2016</b>	<b>\$2,350.00</b>	<b>\$2,000.00</b>	<b>\$350.00</b>
39	Department of Correctional Services	**2526	11/29/2016	\$1,273.85		
	Department of Correctional Services	**2526	11/29/2016	\$1,041.31		
	<b>Department of Correctional Services</b>	<b>**2526</b>	<b>11/29/2016</b>	<b>\$2,315.16</b>	<b>\$1,999.00</b>	<b>\$316.16</b>
40	Department of Transportation	**3716	10/21/2016	\$1,302.62		
	Department of Transportation	**3716	10/21/2016	\$997.04		
	<b>Department of Transportation</b>	<b>**3716</b>	<b>10/21/2016</b>	<b>\$2,299.66</b>	<b>\$2,000.00</b>	<b>\$299.66</b>
41	Department of Transportation	**1706	6/15/2017	\$1,739.95		
	Department of Transportation	**1706	6/15/2017	\$546.85		
	<b>Department of Transportation</b>	<b>**1706</b>	<b>6/15/2017</b>	<b>\$2,286.80</b>	<b>\$2,000.00</b>	<b>\$286.80</b>
42	Game & Parks Commission	**1439	8/5/2016	\$1,568.49		
	Game & Parks Commission	**1439	8/5/2016	\$714.02		
	<b>Game &amp; Parks Commission</b>	<b>**1439</b>	<b>8/5/2016</b>	<b>\$2,282.51</b>	<b>\$2,000.00</b>	<b>\$282.51</b>
43	Commission for the Blind & Visually Impaired	**6180	5/5/2017	\$960.00		
	Commission for the Blind & Visually Impaired	**6180	5/5/2017	\$790.00		
	Commission for the Blind & Visually Impaired	**6180	5/5/2017	\$255.00		
	Commission for the Blind & Visually Impaired	**6180	5/5/2017	\$120.00		
	Commission for the Blind & Visually Impaired	**6180	5/5/2017	\$85.00		
	<b>Commission for the Blind &amp; Visually Impaired</b>	<b>**6180</b>	<b>5/5/2017</b>	<b>\$2,210.00</b>	<b>\$2,000.00</b>	<b>\$210.00</b>
44	Game & Parks Commission	**2156	2/21/2017	\$1,280.70		
	Game & Parks Commission	**2156	2/21/2017	\$845.80		
	<b>Game &amp; Parks Commission</b>	<b>**2156</b>	<b>2/21/2017</b>	<b>\$2,126.50</b>	<b>\$2,000.00</b>	<b>\$126.50</b>
45	Department of Correctional Services	**9384	11/17/2016	\$962.77		
	Department of Correctional Services	**9384	11/17/2016	\$960.85		
	Department of Correctional Services	**9384	11/17/2016	\$177.84		
	Department of Correctional Services	**9384	11/17/2016	\$23.76		
	<b>Department of Correctional Services</b>	<b>**9384</b>	<b>11/17/2016</b>	<b>\$2,125.22</b>	<b>\$1,999.00</b>	<b>\$126.22</b>
46	Department of Transportation	**1706	9/22/2016	\$1,965.72		
	Department of Transportation	**1706	9/22/2016	\$129.91		
	Department of Transportation	**1706	9/22/2016	\$17.89		
	<b>Department of Transportation</b>	<b>**1706</b>	<b>9/22/2016</b>	<b>\$2,113.52</b>	<b>\$2,000.00</b>	<b>\$113.52</b>
47	Department of Transportation	**1451	2/7/2017	\$1,359.37		
	Department of Transportation	**1451	2/7/2017	\$748.50		
	<b>Department of Transportation</b>	<b>**1451</b>	<b>2/7/2017</b>	<b>\$2,107.87</b>	<b>\$2,000.00</b>	<b>\$107.87</b>
48	Game & Parks Commission	**1866	5/15/2017	\$772.22		
	Game & Parks Commission	**1866	5/15/2017	\$674.78		

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**Exhibit D**

Transaction Number	Managing Account Name	Account Number	Date	Amount	Single Purchase Limit	Amount Over Limit
	Game & Parks Commission	**1866	5/15/2017	\$646.96		
	<b>Game &amp; Parks Commission</b>	<b>**1866</b>	<b>5/15/2017</b>	<b>\$2,093.96</b>	<b>\$2,000.00</b>	<b>\$93.96</b>
<b>49</b>	Game & Parks Commission	**6326	2/4/2017	\$1,715.01		
	Game & Parks Commission	**6326	2/4/2017	\$359.40		
	<b>Game &amp; Parks Commission</b>	<b>**6326</b>	<b>2/4/2017</b>	<b>\$2,074.41</b>	<b>\$2,000.00</b>	<b>\$74.41</b>
<b>50</b>	Game & Parks Commission	**1805	8/11/2016	\$1,377.18		
	Game & Parks Commission	**1805	8/11/2016	\$695.03		
	<b>Game &amp; Parks Commission</b>	<b>**1805</b>	<b>8/11/2016</b>	<b>\$2,072.21</b>	<b>\$2,000.00</b>	<b>\$72.21</b>
<b>51</b>	Department of Transportation	**1723	4/21/2017	\$1,798.75		
	Department of Transportation	**1723	4/21/2017	\$261.03		
	<b>Department of Transportation</b>	<b>**1723</b>	<b>4/21/2017</b>	<b>\$2,059.78</b>	<b>\$2,000.00</b>	<b>\$59.78</b>
<b>52</b>	Game & Parks Commission	**3641	6/14/2017	\$1,602.42		
	Game & Parks Commission	**3641	6/14/2017	\$416.34		
	Game & Parks Commission	**3641	6/14/2017	\$39.98		
	<b>Game &amp; Parks Commission</b>	<b>**3641</b>	<b>6/14/2017</b>	<b>\$2,058.74</b>	<b>\$2,000.00</b>	<b>\$58.74</b>
<b>53</b>	Game & Parks Commission	**2098	9/27/2016	\$582.03		
	Game & Parks Commission	**2098	9/27/2016	\$500.20		
	Game & Parks Commission	**2098	9/27/2016	\$319.76		
	Game & Parks Commission	**2098	9/27/2016	\$236.08		
	Game & Parks Commission	**2098	9/27/2016	\$189.20		
	Game & Parks Commission	**2098	9/27/2016	\$72.04		
	Game & Parks Commission	**2098	9/27/2016	\$62.72		
	Game & Parks Commission	**2098	9/27/2016	\$52.01		
	Game & Parks Commission	**2098	9/27/2016	\$38.24		
	Game & Parks Commission	**2098	9/27/2016	\$4.93		
	<b>Game &amp; Parks Commission</b>	<b>**2098</b>	<b>9/27/2016</b>	<b>\$2,057.21</b>	<b>\$2,000.00</b>	<b>\$57.21</b>
<b>54</b>	Game & Parks Commission	**1219	1/26/2017	\$1,500.00		
	Game & Parks Commission	**1219	1/26/2017	\$523.37		
	<b>Game &amp; Parks Commission</b>	<b>**1219</b>	<b>1/26/2017</b>	<b>\$2,023.37</b>	<b>\$2,000.00</b>	<b>\$23.37</b>
<b>55</b>	Game & Parks Commission	**6064	7/26/2016	\$1,166.94		
	Game & Parks Commission	**6064	7/26/2016	\$567.42		
	Game & Parks Commission	**6064	7/26/2016	\$283.37		
	<b>Game &amp; Parks Commission</b>	<b>**6064</b>	<b>7/26/2016</b>	<b>\$2,017.73</b>	<b>\$2,000.00</b>	<b>\$17.73</b>
<b>Totals</b>				<b>\$161,424.72</b>		<b>\$34,928.72</b>