



Tales from the Compliance Side

THE CRYPT KEEPER

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VCU Program Stats

P-Cards:
1250

Travel Cards:
127

FY16
Transactions:
85,844



FY16 Spend

P-card:
\$22,198,403.65

ATC:
\$3,968,818.29

Travel Cards:
\$430,628.93

Part I: Finding Compliance Issues



High Risk Categories

- Risk Assessment/reduction
- MCC restriction tables are helpful and highly recommended
- Vendors/categories that bypass restrictions:
 - U-Haul/Penske
 - Jewelry stores
 - ABC stores
- Sort lists using MCCs (5992-Florists, 5944-Jewelry), but also keywords (flower, florist, gift, jewel, etc.)



Tale:
Waterford

Scan your Transactions

- Full scan of all transactions
 - Once a month take time to scan the SPCC Gold report for any vendors that look out of place or may not have been caught by MCC restrictions
 - This will also allow you to familiarize yourself with which departments/cardholders buy from these vendors



Tale: Raypath

Know your program

- There is no substitute for knowing your program.
 - What do your cardholders buy?
 - What is out of character?
- Remember that you are a consumer. Pull from your experiences as a consumer to assist you.

Tale: Cheaper than Dirt



Stay on top of Reconciliations

- Transactions that go unreconciled for a long period of time can be a cause for concern.
- Cardholders and/reviewers that are withholding sign off may be doing so because they realize they have committed/found a violation

Tale: Dominion Lower



Ask Questions

- Don't be afraid to ask questions.
- Consistent compliance checks lead to less anxiety when contacted by PA's
- People tend to dread hearing from us. You can change that!
- Cardholders will be honest with if you are transparent. Take the mystery out of the process.



Part II: Addressing issues



Fraud

Tale: Desert Sun Inn & Resort



- The easiest of all issues!
- Reassure the cardholder.
- Remind them that sometimes they can be a victim of fraud despite their best efforts to secure the card.
- MCC restrictions works wonders here.

Personal Use

- Can it be refunded to the card?
- Proof of re-payment
- Intent
- Theft



Tale: Convenience stores

Egregious Violations

- By far the most challenging.
- Political
- Can affect employment.
- Have your ducks in a row.
- Be clear on next steps for the involved parties.
- Involve upper management whenever possible.
 - This will give *you* support.
- Stand your ground.

Tale: Cover-Up



Missed violations



- Something will get by you
- Nobody is perfect
- One size does not fit all



- Compliance is a complicated subject. It isn't just about catching violations. It's about correcting inappropriate purchasing methods.
- It's about making your program run smoothly and within established policies and procedures.
- Our job as PA's is to "police" the program. It's also our job to remember that people make mistakes and to help them learn from them.
- Be open and honest with your cardholders and reviewers. Let them know you are there to support them, not to just "catch them being bad."

Best Advice: Know your program

Thank You!

