Procedure For Regents Policy Violations

The procedure is intended to encourage compliance with the policy by citing, educating and/or applying restrictions to departments who do not observe policy. The procedure will be effective for violations occurring after the date of its implementation. Violations shall be considered "second" or "subsequent" violations if they occur within one year of the first violation.

a) Violations identified: A monthly Risk Report from CUFS will identify transactions which need review as possible violations to policy. Purchasing will review the report, seek more information as necessary, and identify violations.

b) Notification: A letter will be sent to departments whose purchase did not conform to policy, informing the department that the violation will be reported to the Board of Regents. The Dean/Director/Department Head, as well as the Area Manager and Chief Financial Officer of the VP or Provost unit are all copied on this letter.


Reporting to the Board of Regents shall include the department name, the dollar amount of the violation, a reason/explanation for the violation as cited by the department, whether this is a first, second or third violation by the same department, action taken by the department to prevent further violations, and whether a fee has been applied for the current violation.

d) Restrictions:

First Violation: The Notification and Reporting (see b and c above) shall be considered sufficient for the first violation. Also, the appropriate individual(s) will be required to attend classes on purchasing policy and procedures offered by Training Services.

Second Violation: Notification and Reporting will be applied. In addition, an administrative processing fee shall be applied, which shall be payable by the department and shall be equal to 10% of the dollar amount of the purchasing which did not conform to the policy.

Subsequent Violations: Notification, Reporting and Fee shall all apply. In addition, the department shall be identified as an Exceptional department. The Notification and Reporting shall identify them as such and shall copy the Provost, or the applicable Vice President, the CFO/UFO, and the University Controller. Together, they will determine appropriate action at this point up to and including suspension of purchasing authority for the department.