Emory University

Procurement and Support Services

Process Guide

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Table of Contents

Key Terms

- **Bidder** – An individual or organization that submits a formal offer in response to solicitation such as Invitation for Bid (IFB), Request for Proposal (RFP), or Request for Quotation (RFQ). Bidders compete to provide goods and/or services under specified terms, and their submissions are evaluated based on criteria including price, quality, and compliance. The winning bidder is typically awarded a contract to fulfill the procurement requirements.
- **Buying –** Transactional. Requesting, ordering, and purchasing goods or services using approved methods like POs, catalogs, or credit cards.
- **Contracting** - Creating and managing formal agreements with suppliers. This includes drafting, reviewing, and executing contracts that define scope, pricing, and responsibilities.
- **Competitive Bids –** Pricing obtained from at least three suppliers for the same goods or services, for the same scope, and for the same time period as the intended purchase.
- **Contract Management** – The administration of contracts with suppliers to ensure compliance, performance, and value delivery throughout the contract agreement life cycle.
- **Cooperative Purchasing Consortiums -** Is a collaborative arrangement where multiple organizations join together to competitively solicit and award contracts, allowing members to purchase goods and services under shared agreements, often resulting in cost savings and administrative efficiencies.
- **Group Purchasing Organizations (GPOs) -** Is an entity that leverages the collective buying power of its members, often hospitals, universities, or businesses to negotiate discounted pricing and favorable terms with suppliers for goods and services.
- **Independent Contractor** – An individual, not a company, engaged to perform services under a contract where business unit has the right to specify the expected result or outcome to be accomplished by the scope or statement of work, but not the means and methods by which the result is to be accomplished. Individuals operating under an LLC are not considered Independent Contractors.
- **Invitation for Bid (IFB)** – A formal procurement method used to solicit competitive bids from qualified suppliers for clearly defined goods and/or services. The document includes detailed specifications, terms, and conditions, and is awarded to the lowest responsive and responsible bidder. IFBs are commonly used when price is the primary factor, and the requirements are straightforward
- **Maverick Spend or Tail Spend** – Purchases made outside of approved procurement channels, often leading to inefficiencies or compliance risks.
- **Purchase Order (PO)** – A legal binding contract issued by Procurement to a supplier detailing the items, quantities, and agreed prices for products or services.
- **Radioactive Materials** – Any substance containing radionuclides where both the activity concentration and the total activity exceed specific regulatory thresholds, such as those outlined in 49 CFR 173.436. Approval to acquire radioactive materials must be received from the university's Environmental Health and Safety Office prior to the creation of a purchase order. The university's eProcurement system must be used for the purchase of all radioactive materials. Environmental Health and Safety Office approval number must be referenced on the requisition.
- **Request for Quote (RFQ)** – Used to solicit price quotes from suppliers for clearly defined goods and/or services.

- **Request for Proposal (RFP**) - A formal document inviting suppliers to submit proposals for a specific service or product, often used for complex or high-value procurements.
- **RFx**- A collective term used in procurement to refer to a family of "Request For ..." documents organizations use when engaging suppliers. The **"x"** is a placeholder representing different types of sourcing events depending on the goal of the request.
- **Payments** - Processing supplier payments for received goods/services. Includes invoice review, payment scheduling, and managing payment methods like credit cards, checks, ACH, or wire.
- **Quote -** A formal statement provided by a supplier that specifies the price, terms, and conditions, including shipping, for goods or services requested by a buyer. It is usually based on the buyer's specifications and serves as an offer that can be accepted to form a contract.
- **Sourcing**: The strategic process of finding and selecting suppliers. It includes market research, competitive bidding (like RFQs and RFPs), and negotiating terms to meet organizational needs.
- **Strategic Sourcing** – A procurement approach focused on long-term supplier relationships, total cost of ownership, and value creation beyond price. Contracts established under this approach are considered Strategic Contracts.
- **Supplier Relationship Management/Supplier Engagement**– A systematic approach to managing interactions with suppliers to maximize value and reduce risk.

1. Introduction

Purpose of the Guide

This process guide serves as a comprehensive guide that outlines standardized procedures for acquiring goods and/or services. Its primary purpose is to ensure consistency, transparency, and compliance with internal policies and external regulations throughout the sourcing to payment lifecycle.

This manual is a supplement to distributed documentation on the Procurement website, Procurement System job aids, and Finance System job aids.

Source to Payment Process

The source-to-payment process encompasses the full lifecycle of procurement activities, from identifying needs to final payment. This includes:

- Supplier identification and setup
- Sourcing and contract negotiation
- Supplier Setup, if applicable
- Requisition and purchase order creation
- Invoice approval, as applicable
- Invoice Processing and payment

Roles and Responsibilities

The procurement to payment process involves multiple stakeholders, each with distinct responsibilities to ensure transparency, efficiency, and compliance

Procurement and Support Services has the authority to negotiate procurement terms and execute contracts for the purchases of goods and services. All procurement activities must align with institutional policies and regulatory requirements.

Procurement Strategic Sourcing

Strategic Sourcing leads the comprehensive procurement lifecycle, including:

- Develop Requirements based on the need identified by the requesting department
- Identify multiple sources for the good or service, unless purchase qualifies as a single or sole source
- Sourcing and competitive bidding using the developed requirements
- Tentative selection
- Contract negotiation
- Requisition approval and PO Creation
- Supplier management

Requesting Department

The requesting department initiates the procurement process by:

- Identifying goods and/or service needs
- Partner with Procurement-Sourcing to evaluate suppliers and support selection and approval
- Awareness of contractual risks
- Preparing contract review requests and/or requisitions
- Providing technical specifications
- Entering ordering requestions for goods and services
- Confirm receipt of goods and services and approve invoices

Accounts Payable

Accounts Payable (AP) ensures timely, accurate, and compliant payment for goods and services. They have the authority and responsibility to:

- Review and validate invoices, payment requests, and supporting documentation
- Verify supplier setup, including tax documentation, banking information, and compliance with institutional standards
- Resolve discrepancies and manage inquiries from suppliers and internal stakeholders
- Collaborate with Procurement and other departments to address exceptions, disputes, or compliance issues related to payment processing
- Maintain credit card processes and policies

2. Procurement Best Practices

To ensure consistency, compliance, and transparency in all procurement activities, the following best practices should be observed in all procurement efforts.

Source Selection

Emory's Internal Service Providers

Every effort should be made to utilize Emory's internal service providers whenever possible. Examples include Emory Document Services (Printing, Copying, Graphics), OIT (IT consultants, software developers, or cloud providers), Emory Managed Print Services (for office printing equipment), Campus Services/Facilities (work management - maintenance and repairs), EHSO (cleaning and environmental care). *Note this list is illustrative and not intended to be exhaustive.*

Strategic Contracted Suppliers

Strategic Contracted Suppliers are awarded through a strategic sourcing process conducted by Procurement. These contracts have been competitively sourced and frequently include benefits to Emory University and individual departments through negotiated volume-based pricing, rebates, free shipping, among others. As specified in Policy 2.121, utilization of these suppliers does not require additional quotes unless required for the purchase of equipment, required by grant funding, or internal department process. **The current listing of these contracts is available in Emory's eProcurement system under the Procurement Resources tile.**

Group Purchasing Organizations (GPOs)

The University is a member of several Group Purchasing Organizations (GPOs) and cooperative purchasing consortiums. Most contracts awarded through these entities are competitively bid and meet the university's competitive bidding requirements. Departments may utilize these contracts without conducting a separate bidding process. For a list of approved GPOs and consortiums, or to confirm the eligibility of a specific contract, departments must contact Procurement's Sourcing team. Only Procurement and Support Services can enter into a Consortium or GPO on behalf of the university. Minimal documentation is required when using a GPO.

Competitive Bidding and Fair Evaluation

When a Strategic Contract is not available, competitive bidding is required if the total amount spent with a supplier exceeds the threshold set in The Strategic Procurement Policy 2.121. This requirement applies to the combined value of all purchases from that supplier, not just individual transactions. To uphold transparency and integrity in the procurement process:

- All qualified suppliers must be given equal access to bidding opportunities and receive consistent information. Departments performing competitive solicitations should follow the guidance detailed within "Solicitation Sourcing Guidelines" of this document.
- Objective evaluation criteria should be applied uniformly to assess supplier responses.

- Cross-functional evaluation committees should be established to minimize bias and enhance decision-making quality.

Single or Sole Source

Single or Sole Source selection, when necessary, must meet established guidelines. Guidelines for what constitutes a Single or Sole Source are contained within the form located here: Single/Sole Source. Procurement reviews submitted Single/Sole Source justification forms and may reject it if the justification does not meet the guidelines, or required backup is not provided.

Documentation and Recordkeeping – Best Practices

To maintain thorough and accurate records to support transparency and audit readiness:

- Maintain detailed records of all procurement activities, including solicitations, bid submissions, contract awards, approvals, and communications.
- Ensure records are retained in compliance with institutional policies and regulatory requirements.

The documentation must be attached to the contract review request and if applicable, attached to the requisition. See Section 5 – Contract Execution and Storage for more information.

Ethical Standards and Code of Conduct

Procurement activities must be guided by a strong ethical framework:

- All individuals involved in procurement must follow a clearly defined code of ethics that promotes integrity, impartiality, and responsible behavior.
- Disclose any personal or financial interests that may influence procurement decisions as defined in Conflict of Interest Policies. Follow institutional procedures for conflict resolution.

Sustainability Considerations

Procurement decisions may consider, where appropriate, environmental and social responsibility:

- Products that are recycled, low-emission, energy-efficient, or locally produced to reduce environmental impact and support community development
- Products from suppliers who have committed to conflict-free supply chains in accordance with the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act) section 1502
- Maintain a balanced supplier portfolio to mitigate risks and encourage competitive innovation

Purchases funded by Grants and/or Federal Contracts

Purchases funded by Grants and/or Federal Contracts will have additional stipulations per the governing document. The Office of Sponsored Programs and Office of Research Administration Services (RAS) can assist with these additional requirements.

3. Requisition Process

A requisition is a formal request to purchase goods or services and it plays a critical role in the Source to Pay Process by ensuring purchases are properly authorized, documented, aligned with university policies and budgetary controls. The requisitions steps include:

1. Identifying the need: The requestor determines what good and/or services are required
2. For quotes and contracts equal to or greater than $50,000, refer to the approval and escalation procedures contained in Section 5 Contracts & Quotes: Negotiations, Review and Associated Risks
3. For quotes less than $50,000, or after Procurement's review, create an Ordering Requisition by following the steps in Section 7. Review Associated Risks in Section 5, for applicable risk mitigation, regardless of dollar value
4. Budget Review and Approval Workflow: Once the requisition has been submitted, depending on value, the requisition is checked for availability of funds and approved by all required stakeholders
5. Purchase Order Creation: Once approved, a purchase order is issued and sent to the supplier

For additional guidance on creating an ordering requisition in the eProcurement system, refer to Section 7: "Create an Ordering Requisition." That section provides comprehensive instructions and resources to support the requisition process.

4. Solicitation Sourcing Guidelines

The Solicitation Sourcing Guidelines provides guidance to departments, where allowable, in conducting sourcing events for goods or services when no Strategic Contracted Supplier is available. This Section outlines practical steps and best practices to ensure compliance, fairness, and effective supplier selection. For federally funded awards that exceed the micro-purchase limit, contact Procurement and Support Services and the Office of Sponsored Programs before starting.

For Construction, renovation, building equipment maintenance, departments must contact Campus Services for further direction.

For IT hardware and software, departments must contact Procurement and Support Services for further direction.

Any purchase totaling $250,000 or more over the entire contract period, regardless of the funding source, must be sourced by Procurement. This threshold ensures centralized oversight, strategic alignment, and compliance with institutional and regulatory requirements. To request Procurement's support in managing your sourcing event or for any assistance, email sourcingandprocurement@emory.edu. You will be connected with the appropriate Sourcing Manager to ensure you receive expert guidance and support throughout the sourcing event.

Sourcing Event Steps

1. Define needs, objectives, and funding
2. Solicitation Design and Content Development
3. Finalization of Solicitation
4. Proposal Evaluation and Analysis
5. Award

Responsibility Flowchart

Stage 1 - Department

- Scope Developement
- Risk Coordination
- Solicitation Planning and Prep
- Conduct Sourcing Event
- Evaluation
- Submit Contract Review Request

Stage 2 - Procurement

- Contract Negotiation
- Final Risk Assesments
- Signature Routing
- Award and Supplier Nofiications

Stage 3 - Department

- Ordering Requistion
- Workflow Approvals
- Invoice Approval

Phase 1: Sourcing Event Planning

Define needs, objectives, and funding

Clearly state the goals and objectives of the sourcing event process. Outline what the department aims to achieve through this procurement, including the scope of services or equipment requirements. Consider Service Level Agreement (SLA) requirements, metrics used to measure performance, problem resolution, KPIs, credits/penalties, etc. Ensure funding is secured for implementation and ongoing costs. If there are budget constraints or guidelines proposers should follow, include them in the solicitation.

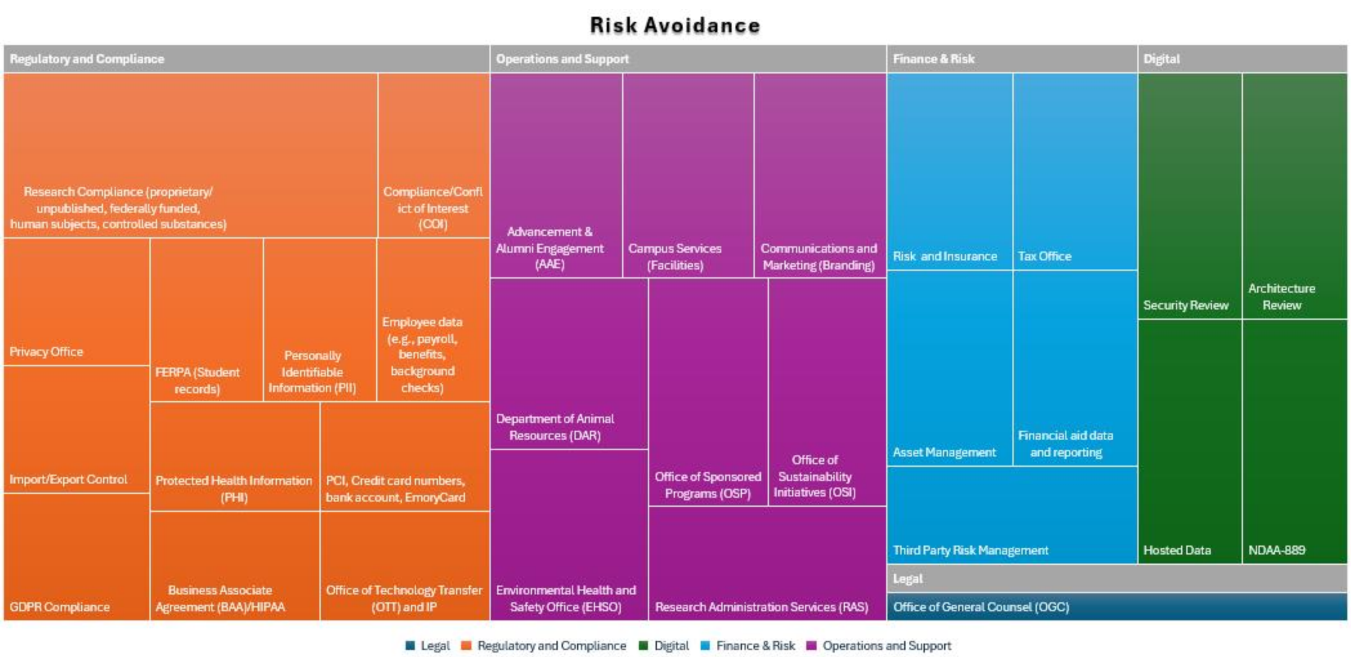
Identify stakeholders and evaluation criteria

Identify key stakeholders who will participate in scope development and evaluation. Outline the review and selection process, including who will be involved and any necessary approvals that need to be obtained. Any individual with a potential or actual conflict of interest must recuse themselves from relevant discussions and decisions.

Risk Avoidance and Sensitive Data

Departments conducting their own sourcing events must coordinate with the relevant university departments to address the unique risks associated with procuring their goods or services. Ensure that you consult with departments responsible for compliance or regulatory matters to meet university requirements.

Contract risk must be considered during a sourcing event, located in this manual under [Contract Negotiations and Associated Risks.]



Contract Term Limitations

Limit the contract term to allow for a sufficient period to establish and evaluate the supplier's performance while maintaining flexibility for future adjustments. The contract term can include a provision for optional one-year renewal periods, contingent on satisfactory performance. Ensure that the total contract duration, including any optional renewals, does not exceed five years. This limitation helps to maintain a competitive environment by periodically testing the market and ensuring that Emory continues to receive fair pricing and high-quality services. Avoid automatic renewals and "evergreen" contract terms.

Solicitation Options - Select sourcing method

Identify the type of sourcing event that will be used to gather information for supplier selection

- **Request for Quote (RFQ)** – used to solicit price quotes from suppliers for clearly defined goods and/or services.
- **Request for Proposal (RFP**) - A formal document inviting suppliers to submit proposals for a specific service or product, often used for complex or high-value procurements.
- **Invitation for Bid (IFB)** – A formal procurement method used to solicit competitive bids from qualified suppliers for clearly defined goods and/or services. The document includes detailed specifications, terms, and conditions, and is awarded to the lowest responsive and responsible bidder. IFBs are commonly used when price is the primary factor, and the requirements are straightforward.

Timeline

Create a detailed timeline with key milestones and deadlines including:

- Release Date – When the RFx will be issued
- Proposal Due Date – Deadline for supplier submissions
- Q&A Period – When suppliers can submit questions and receive responses
- Interview Schedule – Dates and times for supplier interviews
- Award Timeline: Consider the time required for legal redlines review, contract negotiations, insurance reviews, and compliance approvals required by other Emory departments in the overall schedule.

Evaluation Committee

Evaluation committees play a critical role in ensuring fair, transparent, and object supplier selection. These guidelines help standardize the formation, responsibilities, and conduct of the evaluation teams. Committees should be composed of odd numbered members (typically 3, 5, or 7) to avoid tie votes and ensure balanced decision making. Committee members should represent a cross-section of relevant departments including requesting department or technical experts, finance or budget office, end users or stakeholders, and procurement.

Evaluation Criteria

Develop and approve weighted evaluation criteria prior to issuing the solicitation to ensure objectivity and alignment with strategic goals. This proactive approach minimizes bias and guides stakeholders toward measurable, value-driven priorities. Incorporating a standardized pricing template is recommended to promote consistency across supplier proposals and facilitate accurate cost comparisons.

Committee Size	Recommended Use Cases
3 members	Suitable for small-scale procurements, low risk purchases, or when minimal technical input is required.
5 members	Ideal for moderately complex procurements requiring cross functional collaboration and broader evaluation perspectives.
7 members	Recommended for high-value, high-risk, or strategic procurements. Led by Procurement in coordination with relevant departments, involving deep technical, financial, and legal expertise.

Phase 2: Solicitation Design and Content Development

Supplier Selection

Invite suppliers based on a comprehensive set of qualifications, including demonstrated reputation and relevant experience, proven product or service quality, and adherence to applicable industry standards and regulatory requirements. Additional considerations may include financial stability and commitment to sustainability practices. These criteria help ensure a competitive, responsible, and inclusive procurement process.

If the invited suppliers are not set up, have the "supplier desk" run visual compliance. By verifying that potential suppliers are not on the debarment list, Emory is protected from legal, financial, and reputational risks associated with engaging ineligible suppliers.

Point of Contact

Designate a specific person or team as the point of contact for any inquiries or clarifications. Include their contact information and preferred communication method. Clearly communicate how and when updates and notifications will be provided to bidders throughout the solicitation process.

Rights Reserved by Emory

Communicate to suppliers that the information provided is confidential. All communication should only go to the selected Point of Contact. Emory can withdraw or modify the solicitation at any time, selection can be split between multiple suppliers and does not infer exclusivity, and Emory does not reimburse suppliers for the cost of developing their proposal or participation in any sourcing event meeting.

Legal and Compliance Requirements

Explicitly outline all legal, contractual, and regulatory obligations that suppliers are expected to meet throughout the sourcing process. This includes compliance with relevant industry standards, required certifications, and any specific regulatory mandates tied to the scope of work. Suppliers must also disclose any potential conflicts of interest involving reviewers or stakeholders, such as prior business relationships or affiliations that may affect impartiality.

Procurement and Support Services maintains an approved Professional Services Agreement Contract Template available on the Procurement website. This template should be incorporated into your sourcing event if soliciting for consultant or other professional services. If a supplier intends to propose their own agreement, it must be submitted for review using the Contract Review process. Failure to use the most current version of Emory's standard contract or reliance on a supplier's agreement without prior review may result in delays in negotiation and execution.

Pricing

Define acceptable pricing models in detail, which may include unit pricing, professional service fees, fixed-price contracts, variable-rate structures, or project-specific pricing. Suppliers should be instructed to include all relevant assumptions, exclusions, and clarifications to promote transparency and prevent misinterpretation. To support fair and consistent evaluation across proposals, provide a standardized pricing sheet or template aligned with the scope of work and evaluation criteria. Common pricing structures typically include:

1. **Unit Pricing**: Price per item, hour, or measurable unit.
2. **Fixed Pricing**: Total cost for a defined scope of work, regardless of actual time or resources used.
3. **Variable Pricing**: Cost fluctuates based on usage, volume, or other dynamic factors.
4. **Professional Service Fees**: Hourly or daily rates for specialized expertise; can include reimbursable expenses.
5. **Project-Specific Pricing**: Custom pricing based on unique project requirements, deliverables, and timelines

Proposal Submission Guidelines

Provide a detailed description of the required proposal format, including organizational structure, content sections, and any mandatory forms, certifications, or supporting attachments. Indicate the preferred submission method, such as electronic delivery via email, and include step-by-step instructions to ensure proper receipt and tracking. Set firm deadlines for submitting proposals, supplier inquiries, and all required documentation to promote consistency, transparency, and alignment with the established procurement timeline.

Q&A Session or Pre-Proposal Meeting (if applicable)

If a Q&A session or pre-proposal meeting is planned, clearly communicate the date, time, format (e.g., virtual or in person), and access instructions in the solicitation documents. To ensure transparency and consistency, it is recommended that sessions be recorded or that all questions be submitted in writing. Responses to all questions, whether asked during the session or submitted separately, must be compiled and shared with all participating suppliers to maintain a level playing field.

Phase 3: Finalization of Solicitation

Information Consolidation

Review and consolidate all information, including stakeholder inputs, compliance requirements, and risk assessments. Verify that all relevant details are accurately captured and reflected in the solicitation document.

Drafting the Solicitation Document

1. Prepare the solicitation with a well-defined scope of work, clear objectives, evaluation criteria, and submission instructions. Include any supplier qualifications, constraints, or special conditions pertinent to the sourcing event.
2. Internal Review and Feedback - Circulate the draft solicitation among key stakeholders and departments for review. Incorporate revisions based on their feedback to ensure alignment with institutional goals and procurement standards.
3. NDA Requirement: If a Non-Disclosure (NDA) is required, release to the invited suppliers prior to releasing the solicitation. Secure signed NDAs before proceeding.
4. Release of Solicitation: Upon receipt of signed NDAs, distribute the finalized solicitation document to all invited suppliers.
5. Receipt Confirmation: Request acknowledgement from each invited supplier confirming receipt of the solicitation materials. This ensures that all invited suppliers have the necessary information to engage in the process.
6. Suppliers Declining to Participate in the Solicitation: A supplier's formal decline or failure to respond by the solicitation deadline is considered a valid attempt at competitive bidding. This must be documented in writing and retained in procurement records to demonstrate due diligence and commitment to fair competition.

Phase 4: Proposal Evaluation and Analysis

Coordination with Impacted Emory Department

Maintain active collaboration with departments identified under Risk Avoidance as their operational, regulatory, or technical requirements may influence the implementation timelines and effective start date of the engagement.

Proposal Evaluation

Assess supplier proposals using a comprehensive set of criteria. While pricing is a key consideration, it should be weighed alongside other factors such as supplier qualifications, relevant experience, regulatory compliance, and the overall quality and feasibility of the proposed solution. Carefully review all pricing assumptions and clarifications to ensure transparency and support equitable comparisons.

Non-Lowest Cost Supplier Justification

When a supplier other than the lowest cost proposer is selected, the award documentation should clearly explain why the chosen supplier represents the best overall value to the University. The justification should be concise, factual, and tied directly to the evaluation criteria used in the procurement. It should address the following:

- Evaluation results: Summarize how the selected supplier performed against the established evaluation criteria compared to other respondents, including overall scoring or ranking where applicable
- Non price factors that drove the decision: **Clearly identify the specific factors that outweighed cost considerations. Examples may include:**
  - Demonstrated experience or specialized expertise
  - Quality, reliability, or feasibility of the proposed solution
  - Ability to meet operational, technical, regulatory, or timeline requirements
  - Strength of staffing model or implementation approach
  - Past performance or institutional knowledge
- Risk considerations: Note any meaningful risks associated with lower cost proposals (e.g., compliance gaps, transition risk, performance concerns) and explain how the selected supplier mitigates those risks
- Total cost and value perspective: Where relevant, explain how the selected proposal offers better long-term value, lower total cost of ownership, or reduced downstream costs, even if the initial price is higher
- Alignment with University needs: Articulate how the selected supplier best supports the University's requirements, priorities, or strategic objectives for the project or service.

The justification should be specific and based on documented evaluation findings. General statements such as "better quality" or "preferred partner" should be avoided unless supported by concrete examples tied to the evaluation.

Supplier Interviews and Due Diligence

Identify shortlisted suppliers based on initial evaluations and determine which will advance to the interview stage. Prepare a standardized set of interview questions aligned with the sourcing event requirements and evaluation criteria. Conduct thorough due diligence, including reference checks, to validate supplier's capabilities and past performance.

Supplier Vetting

For any shortlisted suppliers who are not currently active suppliers, ask Accounts Payable to run visual compliance to ensure they are not listed on any debarment or exclusion registries. This step is essential to safeguard Emory from potential legal, financial, or reputational risks associated with engaging ineligible suppliers.

Phase 5: Award

Presumptive Award and Contract Negotiations

Select a supplier based on their proposal, fees, interview performance, and reference checks. Do not communicate award intentions to any supplier formally or informally prior to completion of the contract review process.

Initiating Procurement Contract Review

To begin negotiations, submit a Procurement Contract Review Form in the eProcurement System. Procurement and Support Services will partner with departments to manage contract negotiation, signature routing, and formal award notification.

Required Documentation for Procurement Contract Review

Include the following materials with your Procurement Contract Review Form submission:

- Names of Evaluation Committee Members
- Final Solicitation Document
- List of Invited Suppliers and Responding Suppliers
- Full Proposal Responses from all suppliers
- Evaluation Matrix – both individual and group
- Award Recommendation and Justification

5. Contracts & Quotes: Negotiations, Review and Associated Risks

Effective negotiation is critical to securing favorable terms, minimizing risk, and ensuring compliance with university policies and procedures. This process includes a thorough review of all contractual and/or quote terms and conditions to identify and address any provisions that may impact pricing, scope, responsibilities, or compliance requirements. Careful evaluation of these items helps safeguard the university's interests, ensures alignment with institutional standards, and reduces the likelihood of contractual disputes or unintended obligations.

Approval and Escalation Procedures

Determine contract value to initiate and approve contracts:

- **Greater than or equal to (≥) $50,000 for the entire contract period-Procurement must review**.
    - Refer to the [Procurement Contract Request Job Aid] to submit your request
    - The Contract Review Form will route through established workflow**.** Procurement will then conduct a thorough evaluation, including departmental risk assessment, redlining, and negotiations with the supplier. Once these negotiations are finalized, the contract will be sent to the appropriate departmental signatory for final approval and execution

- **Less than (<) $50,000 for the entire contract period- Self- Service (e.g., review and execute at a departmental level).**
    - Refer to the [Procurement Contract Request Guidelines] for additional information establishing if a contract can be processed by the department via Self Service
    - Any potential risk or deviations to standard terms, must be brought to the Procurement Sourcing department
    - Any exceptions to Emory contract templates must be brought to the Procurement Sourcing department
    - The department is responsible for adherence to reviewing and executing the contract according to the guidelines below

Important Compliance Note:

Suppliers must not begin any work until a fully executed contract is in place, and, when applicable, a purchase order has been issued. Initiating work before these approvals are in place may result in non-payment. **Departments are responsible** for ensuring all contractual and procurement requirements are completed before services commence.

Key Clauses to Review

When reviewing contracts and quotes that have similar terms and conditions, of any amount, pay close attention to the following clauses to mitigate risk:

- Contract Term Management
    - Clearly defines the contract's effective period
    - Include renewal terms and conditions in the initial agreement, if applicable
    - Avoid auto renewals and evergreen contracts
- Indemnity – Defines who bears responsibility for damages or legal claims
- Jurisdiction and Governing Law – Specifies which legal system will interpret the contract
- International – Insurance and local laws may increase risk
- Liability – Limits financial exposure and defines caps on damages
- Termination – Outlines conditions under which either party may end the agreement
    - Example of Emory's preferred language for Termination for Convenience: *The Owner may terminate this agreement, in whole or in part, at any time and for any reason, by providing written notice to the Contractor. Upon receipt of such notice, the contractor shall immediately cease all Services, unless otherwise directed by the Owner, and shall take reasonable steps to minimize costs incurred as a result of the termination. In the event of termination for convenience, the Owner shall pay the Contractor for all services properly performed and authorized expenses reasonably incurred up to the effective date of termination. The Contractor shall not be entitled to compensation for any unperformed work, anticipated profits, or consequential damages resulting from such termination.*
- Quote specific: Identify and mitigate risks that may arise from embedded terms and conditions. These risks often appear in attachments, hyperlinks, or click-through agreements that introduce obligations beyond the purchase order (PO) or existing contractual terms
    - All Contractual risks listed above
    - Shipping: Shipping obligations are less advantageous for the department. Emory prefers F.O.B. Destination (Emory University) for Domestic shipping and DDP (Delivered Duty Paid) for international goods. Refer to Shipping Services guide.
    - Hidden Obligations: Links or click-through agreements that bind the organization to separate terms without explicit review
    - Contradictory Terms: Terms that override or contradict your organization's PO terms or existing master agreements, creating ambiguity or legal risk

Regulatory Compliance, Legal and Compliance Review (Intellectual Property (IP), sensitive data, insurance)

Before finalizing any contract, conduct a legal and compliance check:

1. Insurance Verification

- Confirm that insurance coverage and limits meet university standards and are current
- Request a waiver of subrogation, where appropriate, to protect the university's interests
- Insurance and Liability Guidance, as provided by the Office of Risk & Insurance can be found on the procurement website: Other Forms and Resources

2. Intellectual Property and Sensitive Data

High-risk items such as sensitive data or intellectual property carry significant legal and regulatory implications. For contracts involving:

- Intellectual property (IP) for patents, inventions, or licensing
- Protected Health Information (PHI)
- Personally Identifiable Information (PII)
- Employee data
- Student records
- Financial aid information
- Financial data (credit cards, PCI compliance, bank account details)
- Federally funded or human subject research data
- General Data Protection Regulation (GDPR) compliance
- Data stored outside the U.S.

Ensure the contract includes:

- Appropriate ownership and usage terms
- Data protection measures
- Breach Notification protocols

3. Regulatory Compliance

As applicable, regulatory compliance ensures contracts comply with applicable laws and regulations.

- FAR (Federal Acquisition Regulation) for government contracts
- FERPA (Family Educational Rights and Privacy Act) for student data
- GDPR (General Data Protection Regulation) for EU data subjects
- HIPPA (Health Insurance Portability and Accountability Act) for health data
- PHI/PII (Protected Health Information/Personally Identifiable Information) for privacy and security
- National Defense Authorization Act of 2019 (NDAA-889) prohibits procuring or using certain telecommunications equipment or services produced by certain companies or their subsidiaries or affiliates with known ties to the People's Republic of China

Escalate High-risk or sensitive data items to Procurement and Support Services for review and coordination with the appropriate compliance offices.

4. Technology and Software Purchases

For any contract or quote involving the purchase, licensing, or renewal of software, including cloud-based solutions, platforms, AI-enabled tools or Professional Services to develop AI-enabled tools, departments must coordinate with Emory's Office of Information Technology (OIT) prior to finalizing agreements.

OIT is responsible for conducting:

Architecture Review: Assess solutions that operate on an enterprise-wide level, or support a significant business process, or could introduce a significant risk to the institution. This includes system compatibility, scalability, and integration with Emory's technology environment.

- **Security Review:** Evaluate data privacy, cybersecurity controls, and system security to maintain regulatory compliance (e.g., HIPAA, FERPA, GDPR). Security Reviews are necessary so that related assets, data, and platforms are identified and can be protected from cybersecurity threats at the enterprise level
- (where applicable) **AI Governance guidance** to ensure alignment with university standards for data protection, system integration, and responsible AI use

NDAA Section 889: Supplier must attest that products and services do not include covered telecommunications or video surveillance equipment as defined by federal statutes.

Departments must submit relevant documentation to OIT and obtain written approval before proceeding with contract execution. Failure to complete these reviews may result in delays, non-compliance, or inability to deploy the software.

For guidance, contact OIT's Architecture and Security teams or refer to the Architecture Review Team (ART) - Home and Information Security Architecture - Home.

5. Conflict of Interest

All contract negotiations and approvals must include a review for potential conflicts of interest in accordance with Emory University's Conflict of Interest Policies. Any individual with a personal or financial interest in the contract must disclose such interest and recuse themselves from related decisions. Refer to Conflict of Interest Policies for details:

Enterprise Conflict of Interest and Conflict of Commitment 4.87,

Conflict of Interest - Trustees, Principal Officers and Key Employees 4.112,

Research Institutional Conflicts of Interests 7.24,

Conflict of Commitment for Faculty, Postdoctoral Fellows or Trainees, and Research Staff 7.38

Financial Conflicts of Interest in Research 7.7.

6. Supplier Code of Ethical Conduct

Consider referencing the Emory University Supplier Code of Ethical Conduct which outlines the ethical, legal, and business standards expected of all suppliers and contractors doing business with Emory. It covers compliance with laws and university policies, responsible business practices, confidentiality, sustainability, and fair dealing. The document sets clear expectations for supplier conduct and describes Emory's commitment to integrity, transparency, and sustainable partnerships.

Risk Assessment and Mitigation Strategies

Risk assessment is a critical step in the procurement lifecycle. It ensures that contracts and supplier engagements are evaluated for potential exposure to compliance, financial, and operational risks. This section outlines the step-by-step process for conducting risk assessments and implementing mitigation strategies.

Evaluate the contract or supplier for risks including:

- Compliance Risk – Does the supplier meet regulatory, legal, and institutional requirements (e.g., data privacy, licensing, insurance)?
- Financial Risk – Is the supplier financially stable? Are payment terms and pricing structures clear and sustainable? Will supplier have access to confidential or restricted data?
- Operational Risk – Can the supplier deliver the required goods/services reliably and within the agreed timeline? Will the supplier have access to secure facilities, students, employees, and/or faculty?
- Tariff Risk – Are goods being imported from another country? There may be additional taxes, duties, tariffs, or fees and potential for U.S. Customs Seizure of Imported Goods.

Mitigation Strategies

- Performance Guarantees
    - Include clauses that require the supplier to meet specific performance benchmarks
    - Define penalties or corrective actions for non-performance
- Service Level Agreements
    - Establish measurable service standards (e.g., response times, uptime, delivery schedules)
    - Include monitoring and reporting requirements to track compliance
- Escalation Protocols
    - Define procedures for escalating issues and resolving disputes
- Termination Clauses
    - Ensure contracts include termination rights for breach, non-performance, and convenience
    - Specify financial obligations and deliverables upon termination
- Third Party Supplier Background Check
    - The supplier and any subcontractors are required to provide a background check attestation if they meet the criteria outlined in The Third Party Supplier Background Check Policy 2.133. Additional information and Attestation Form is located on the website
- Tariff Avoidance
    - Inform your Chief Business Officer (CBO) of any international purchases
    - Include contract clauses that address price adjustments due to tariff changes

- Collaborate with the supplier to identify alternative domestic sourcing options or negotiate shared responsibility for tariff-related costs
- Review "Importing & Exporting International Packages Guidelines" located on the Procurement Shipping Services website

Contract Templates

Procurement and Support Services maintains several contract templates for use with the specific good or service being procured. The Professional Services Agreement and Independent Contractor agreements for domestic suppliers are available on the Procurement website.

While many agreements related to the procurement of goods and services are managed and maintained by Procurement, some agreements, such as material transfer agreements, real estate leases, construction, and academic collaborations are handled by other offices and are not maintained by Procurement. These agreements may not relate to the purchase of goods or services and follow different review and approval processes.

Additional contract templates not maintained by Procurement are available by contacting the Office of the General Counsel, or the responsible office for each.

Always refer to the most current version of contract templates, as they are subject to regular university and federal requirement(s) updates.

Payment Model Comparison

- **Milestone-Based Payments** are ideal when:
  - The scope and deliverables are clearly defined
  - Accountability and performance tracking are critical
  - You want to incentivize progress and completion
  - You need to manage cash flow predictably

- **Time and Materials** are better suited when:
  - The scope is uncertain or likely to evolve
  - You need rapid deployment or iterative development
  - You trust the contractor's efficiency and transparency
  - You want flexibility to adjust priorities mid-project

Feature	Milestone-Based Payments	Time and Materials (T&M)
Definition	Payment is tied to completion of specific deliverables or phases	Payment is based on actual hours worked and materials used
Best For	Long-term, complex, or outcome-driven projects	Short-term, flexible, or exploratory work
Risk Allocation	Supplier bears more risk (must meet milestones to get paid)	Department/Emory bears more risk (pays regardless of outcome)

Feature	Milestone-Based Payments	Time and Materials (T&M)
Budget Predictability	High (fixed payments per milestone)	Low (costs can fluctuate based on time and scope)
Progress Tracking	Built-in via milestone reviews	Requires manual tracking and reporting
Flexibility	Less flexible; changes require renegotiation	Highly flexible; scope can evolve during execution
Examples	Software development, research studies	Consulting, maintenance, prototyping, support services

Contract Approval and Signature Authority

The Contract Approval and Signature Authority Policy 1.2 states individuals do not have the authority to enter negotiations, approve, or sign contracts or Quotes containing terms and conditions, with external entities on behalf of Emory unless there is:

- Authority as set forth in the Bylaws of the University or one of its corporate legal entities;
- a resolution of the Board(s) of Trustees;
- a valid delegation of authority from the President or other Emory official; or
- a purchase made in accordance with Emory's Procurement and Support Services department policies and procedures.

Departments are responsible for keeping up-to-date signature authority documentation, including signature authority delegation letters and matrices, that clearly specify the types of agreements and the monetary limits each position is authorized to sign and providing to Procurement on an annual basis or if changes are made, whichever comes first. Agreements equal to or exceeding $250,000 require Executive Vice President signature, unless otherwise delegated or prohibited by the Bylaws or the Board of Trustees.

Contract Execution and Storage

Procurement and Support Services reviews and stores executed contracts with competitive bids or single/sole source documentation for engagements exceeding $50,000 where a sourcing manager was directly involved in negotiating the agreement. Contracts that require greater visibility due to elevated risk criteria may also be stored by Procurement and Support Services.

Departments executing contracts under self-service must store the executed contracts with competitive bids or single/sole source documentation in a centralized departmental repository. Internal Audit may request review of this documentation at any time.

6. Supplier Setup

Before submitting a new supplier request, please verify the company is not already in our system.

Procurement & Support Services reviews **every** new supplier request, and unnecessary submissions can divert time and resources from our core responsibilities—cultivating long-term supplier partnerships, negotiating volume-based pricing, and evaluating supplier performance to ensure alignment with Emory's strategic goals. To help streamline the process, please follow the steps below to confirm whether a supplier already exists in our system before initiating a new request.

No goods or services can be provided prior to supplier setup.

To request a new supplier, follow these steps:

1. Verify Existing Supplier Status
    - Check Emory Express (for companies) and Compass (for individuals) to determine if the supplier is already set up. For one-time purchases, consider using the departmental P-Card. Payment type recommendations are contained on the Commodity Matrix Add link
    - If there is not an existing supplier that can fulfill the needs of the department, a request can be submitted through Emory's VendorInfo Portal. (NOTE: *Procurement & Support Services reviews all supplier setup requests; therefore, adding new suppliers should be limited)*

2. Initiate Supplier Setup
    - Refer to the job aid, How Do I request a New Supplier or Update an Existing Supplier
    - Conflict of interest attestation is required
    - Supply supporting documentation and detailed description
3. Procurement Review
    - Sourcing will assess and determine whether the supplier setup is appropriate. If appropriate, the supplier is invited to submit their information for Accounts Payable review
4. Accounts Payable
    - AP will confirm supplier's legal business name, review W-8 or W-9 for tax reporting, confirm banking details, and other vetting requirements. Suppliers that do not pass this vetting process are not permitted for supplier setup. The department must select another supplier to provide the goods or services. If the supplier has delivered goods or performed the services, contact Accounts Payable at emory.fsc@emory.edu

7. Create an Ordering Requisition

The department must initiate an ordering requisition in the eProcurement system for domestic companies or organizations that are contracted to provide goods or services. Once the requisition has been approved, a purchase order (PO) is issued and sent to the supplier as formal authorization to proceed. Proceeding without an approved requisition and purchase order may result in delays or non-payment.

Types of Ordering Requisitions

The university's eProcurement system offers several requisition options to meet a variety of purchasing needs including:

- **Hosted Catalogs and Punchouts**
  These options allow users to browse and order goods directly from supplier hosted catalogs or integrated punchout sites, streamlining the procurement process for commonly purchased items.
  - How Do I Order Using a PunchOut
  - How do I Order from an Emory Express Catalog

- **Non-Catalog Form**

  The Non-Catalog Form is used to create a purchase order for goods or services not found in any of the current eProcurement Punchout or Catalog suppliers. This form should be utilized for purchases that do not involve recurring delivery dates over a period of time.
  - How Do I Submit a Non-Catalog Order

- **Blanket PO Form**

  A Blanket Purchase Order (BPO) is a purchase order for goods or services that will be delivered on multiple dates over a specific period of time with predetermined pricing. Examples of BPO usage is consulting services with variable reimbursable expenses, or reoccurring costs for document storage, printers, coffee service, etc. *If you do not involve recurring deliveries, utilize the Non-Catalog Form.*
  - How Do I Create a Blanket Purchase Order

Competitive Bid Documentation

Requestions ≥ $50,000 or greater for the entire contract period must follow the Sourcing and Competitive Bidding Process. Attach your competitive bidding documents or complete the Single/Sole Source Justification fields within the requisition and then use the job aids to complete the requisition listed above. If the higher cost supplier is selected, include documentation addressing Non-Lowest Cost Supplier Justification, described in **#4. Solicitation Sourcing Guidelines, Phase 4.**

Requisition Approval Requirements

Once you have completed the appropriate ordering requisition form and added items to your shopping cart, follow this job aid: How Do I Complete the Checkout Process to complete your requisition and submit for review and approval.

Approvals:

Requestion workflow approval is maintained within the eProcurement system. For Requisitions **≥$250,000,** ensure documentation showing Executive Vice President approval (emails, executed Executive Contract Summary Form, or other written communication).

Requisitions Requiring Specialized Compliance

Capital Equipment (Asset) Purchases: All purchases or disposals of capital equipment, including leased items intended for purchase, must follow the Equipment Capitalization Policy (Policy 2.129). The policy defines what qualifies as capital equipment and specifies valuation criteria.

Radioactive materials – The university eProcurement system must be used for the purchase of all radioactive materials. Approval to acquire radioactive materials must be received from the university's Environmental Health & Safety Office prior to the creation of a Purchase Order. These requisitions are required to reference the Environmental Health & Radiation Safety Office approval number in the description field of the order.

Controlled Substances – The office of Research Compliance and Regulatory Affairs should be contacted for current instructions.

Independent Contractors

Currently, Independent Contractors (Individuals) cannot be entered into the eProcurement system for purchase order (PO) issuance. For more information regarding Independent Contractors, refer to Independent Contractor Guide | Emory University | Atlanta GA

Non-PO Purchases – Check Requests

There are limited reasons for issuing payment outside of Ordering Requisitions. **Check Requests should only occur for these items:**

- Conferences/Training Registrations
- Homeland Security
- Memberships/Subscriptions
- Published Research for journals
- Royalties
- Payments for fraternities/alumni chapters
- Debt service and other bank payments
- Insurance/benefits
- Utilities

- Uniform Transactions: Designed to support campus-wide activities with unique operational demands

Gift Card Purchase

Gift cards may be used for specific Emory business purposes, such as compensating research participants or providing approved gifts to faculty, staff, or students. All gift card purchases must comply with Emory policies and follow the procedures outlined on this website: Emory University Gift Card Exchange

8. Payment for Goods and Services

Accounts Payable is responsible for issuing payments for goods and services to individuals and entities that are located both inside and outside the United States. In addition to the guidelines below, additional information can be found on the Accounts Payable website: Accounts Payable.

Refer to the Fiscal Transaction Reference Guide included in the appendices for role-based payment approval guidance.

Emory Commodity Matrix

The Emory Commodity Matrix provides a quick reference for faculty and staff to choose the correct payment method for common goods and services. It lists preferred options, such as Emory's' eProcurement system, Non-PO Check Requests, Purchasing Card, Corporate Card, and Compass Payment Request, based on the type of purchase, with clear guidance on when to use each. For most items, the matrix marks the preferred method, and a secondary option is listed if the first is not available. If a commodity is not listed, users should select the most similar item for guidance. Always use the preferred method first and refer to the latest matrix for updates. Refer to PCard policy 2.131, the Commodity Matrix, and How to Purchase guides)

Emory Payment Terms and Procedures

This section outlines Emory's payment terms, invoice approval requirements, and invoice submission process. All departments and suppliers must follow these procedures to ensure timely and compliant payment processing.

Standard Payment Terms (e.g., Net 60, SUA, Net 30)

- Net 60 days – Payments made by check. Emory's standard payment terms
- SUA (Single Use Account) – A secure, electronic payment method that generates a one-time virtual card number for each transaction. This is Emory's preferred payment method
- Net 30 days – Payments are made via ACH

- **Follow these steps when requesting non-standard payment arrangements:**

Advance Payments (Pre-payments or Deposits)

1. Determine Eligibility
    - Advanced payment may be permitted under specific circumstances and may require additional approval
    - Typically, advance payments are not advised due to the additional risk, including subpar performance and contractual disputes

2. Seek Approval
    - If the requested advanced payment is $100,000 or greater, obtain written pre-approval from both the Chief Business Officer and Chief Procurement Officer

When Eligible:

- Define Deliverables - Structure payments around predefined project phases or deliverables
- Include in Contract - Clearly outline milestone criteria, payment amounts, and timelines
- Track Progress - Monitor completion and verify deliverables

Milestone-Based Payments

Generally used for long-term or complex projects where a payment is tied to the completion of predefined deliverables or phases, ensuring accountability and progress tracking. Follow these steps when requesting non-standard payment arrangements:

Time and Material Payments

For contracts based on time and materials:

- Ensure hourly rates and material costs are clearly defined in the contract
- Require itemized invoices that match agreed rates and quantities
- Monitor usage against budget and scope

Late Payment Penalties and Interest

To avoid penalties:

- Review invoice terms carefully
- Ensure timely processing in accordance with the payment schedule
- Suppliers may access interest or penalties for late payments based on invoice terms

Dispute Resolution Procedures

- Any invoice under dispute must be promptly communicated to the supplier, accompanied by a clear explanation of the issue, and expected resolution timeframe or corrective action

Invoice Submission Guidelines

- Within 30 days of delivery of goods or services, suppliers must submit PO invoices (in order of preference) via cXML, Emory's eProcurement system, or email to invoice@emory.edu referencing a valid purchase order number directly within the invoice. Invoice MUST only reflect pricing and products on the PO. Invoices not following these instructions are subject to non-payment

Invoice Approvals

Invoice Approval for Companies

The ordering department will receive a notification from Emory's eProcurement system when an invoice is ready for approval under predetermined conditions.

- Job Aid for Approving an Invoice: How Do I Approve an Invoice
- Note that there are different invoice approval instructions depending on several factors that include the value of the PO and how the ordering requisition for Blanket POs was set up. (link back to this section in the guide)
- If the purchase order is a subcontract or the invoice $5,000 or more, invoice approval is required by the requestor before the invoice can be paid
- Prompt approval is necessary in order to stay in compliance with the supplier and prevent the entire university from being placed on credit hold

Invoice Approval for Independent Contractors

When paying individuals, the ordering department must enter a Payment Request in Emory's Financial System. Additional information can be found on the Accounts Payable website: Pay Individuals

- Job Aid for approving Payment Requests and Guidelines for Submitters and Approvers: Payment Requests Guidelines

Invoice Approval Timeliness

Prompt approval is necessary to stay in compliance with the supplier and prevent the entire university from being placed on credit hold.

Corporate Credit Card (Travel Card) and Procurement Card (PCard) and

Emory University offers two credit card options for eligible faculty and staff to facilitate business-related purchases and travel expenses on behalf of their department: the Corporate Credit Card (Travel Card) and the Purchasing (PCard) Card. These cards are administered by Accounts Payable and must be used in accordance with university policies and procedures.

PCard Purpose

The Emory Purchasing Card (PCard) is used for smaller purchases to achieve greater cost efficiency, control, and convenience. A PCard is issued to employees to acquire goods and/or services without having to process the transaction through the traditional purchasing procedure, such as using purchase requisitions or purchase orders. All charges to the PCard must be properly itemized, submitted, and approved via Compass. The PCard expenses are paid directly by the university to J.P. Morgan Chase each month.

Corporate Card (Travel Card) Purpose

The Emory Corporate Credit Card (Travel Card) is used for buying travel and travel-related services required for the conduct of university business. All charges to the Corporate Credit Card must be properly itemized, approved, submitted, and approved via the Expense Request reporting process. The Corporate Credit Card expenses are paid directly by the university to J.P. Morgan Chase for all approved travel expenses. (Any late fees incurred are the responsibility of the cardholder and need to be paid directly to JP Morgan Chase.)

Additional information for both card types can be found on the Credit Card Management website

9. Appendices

- Procurement and Support Services Website
- Procurement System (Emory Express) job aids
- Finance System (Compass) job aids
- Professional Services Agreement (PSA) Template

Contact Information:

- Contact for Strategic Sourcing Team: sourcingandprocurement@emory.edu
- PO Orders or Requisitions, e-market@emory.edu
- FedEx assistance, fedexrequest@emory.edu
- Accounts Payable emory.fsc@emory.edu

Fiscal Transaction Reference Guide

This guide provides a structured overview of the fiscal transaction process at Emory University, including roles, responsibilities, timing, documentation requirements, workflow, and compliance notes.

Workflow Overview

Requestor → Processor → Approver(s) → Additional Approvers (if needed)

Summary of Roles and Responsibilities

Role	What is the Role?	When Does It Occur?	Documentation Required
Requestor / Submitter / Cardholder	Initiates the fiscal transaction or reimbursement request. Must obtain departmental approval if lacking authority.	At the beginning of a fiscal transaction.	Memo, letter, email, online request form, receipts, etc.
Processor (or Proxy)	Completes administrative steps to input or guide the transaction. Cannot approve or process payment.	After requestor initiates the transaction.	Physical documentation (electronic or paper) varies by type.
Approver(s)	Accountable for compliance, documentation, funds, and prerequisite approvals. Must have fiduciary authority.	Varies: before or after transaction depending on type.	Written documentation, receipts, compliance with policy.
Additional University Approvers	Secondary approval for high-dollar or compliance-sensitive transactions. Does not relieve initial approver of responsibility.	When thresholds or compliance requirements apply.	Written documentation per policy.

Notes:

• Requestor: Starts process, provides documentation
• Processor: Administrative handling, cannot approve
• Approver: Ensures compliance, budget, documentation
• Additional Approvers: Triggered by thresholds or compliance rules

Policy Notes & Compliance Rules

• Approvals must come from someone with higher authority than the requestor
• Documentation must be written (electronic or paper), never verbal
• All transactions must occur within delegated authority
• Approvers must challenge non-compliant transactions

System Transaction Timing by Type

- P-Card: Approval after transaction; payment occurs at purchase
- Travel Card: Approval before payment
- eProcurement: Approval before transaction