

After the Fact Purchases (ATF) Information

As defined by Governing Board Policy “**No purchases or commitments of any kind shall be made without previously submitting an approved requisition and securing an authorized purchase order.**” A Washington Elementary School District (WESD) purchase order is the only official authorization for a supplier to provide merchandise or services to the district.”

Situations that require a Corrective Action Plan (CAP) for an ATF:

- Not having an authorized PO in place before placing an order
- Overspending on an open/blanket PO
- “One Time Use” PO used more than one time
- Line-item change with the vendor without receiving a “REVISED” PO
- Registering for a seminar/class prior to receiving a PO
- Purchasing an item using the wrong G/L code or funding source
- Purchase of a Capital item on an Open PO (*Capital Funds MUST use an Itemized Purchase Order – do NOT use a Blanket/Open Purchase Order*)
- A person purchasing using an Open PO that is not listed as an authorized user

The penalties for after the fact procurements can be severe per A.R.S. § 41-2616. The party or parties responsible for an after the fact procurement are subject to a criminal conviction and personal responsibility for payment of all costs associated with the purchase. The vendor in an after the fact procurement may receive delayed payment from WESD, or may be required to obtain payment from the individual who ordered the materials. An after the fact procurement can also result in the loss of valuable funding for WESD.

Governing Board Policy DIB states "No purchases or commitments of any kind shall be made without previously submitting an approved requisition and securing an authorized purchase order. A Washington Elementary School District purchase order is the only official authorization for a supplier to provide merchandise or services to the District."

The following is the procedure that needs to take place immediately upon notification that an after-the-fact purchase has been made.

- The employee who initiated the purchase and his or her immediate supervisor/administrator must fill out a corrective action plan form, explaining in detail why the problem occurred and what steps will be taken to prevent this from occurring again in the future. The supervisor/administrator must verify in the corrective action plan those product/services were requested and received/performed. A copy of the corrective action plan is to be forwarded to the internal auditor for monitoring purposes. Other personnel may initiate the correct action plan, i.e. Accounting manager or Purchasing Director upon the discovery of an issue where the responsible staff is no longer employed.
- A copy of the corrective action plan form is to be forwarded to the Internal Auditor for monitoring purposes and is to be attached to the requisition/PO. A copy of the invoice, expired purchase order (if applicable), notice of claim (if applicable), and any other related documentation shall be also be attached to the applicable requisition/PO.
- The Internal Auditor will submit the CAP to the Assistant Superintendent of Business Services for review/approval. All Approved/signed CAP forms are submitted to Purchasing and attached to corresponding requisition or purchase order.
- Any Purchase Orders needing to be revised as a result of the ATF will also require a PO revision to be submitted to PORevisions@wesdschools.org.