



COOK COUNTY BUREAU OF FINANCE

POLICY TITLE: PURCHASING CARD POLICY

Applicable Forms may be found at:
<https://www.cookcountyil.gov/service/purchasing-card-policy>

Effective: 4/2/2025

Supersedes: N/A

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I. GENERAL PROVISIONS

A. Purpose

The primary means of purchasing valid goods and services necessary for conducting County business is the procurement process. This policy addresses employee use of Purchasing Cards (P-Cards). This policy does not cover employee travel and business expense reimbursements which are addressed in the Employee Business and Travel Expense Reimbursement Policy. The following protocols and related procedures must be complied with; however, they are not intended to address every situation.

The purpose of the Cook County Purchasing Card Program (the P-Card program) is to provide an efficient, cost-effective, secondary payment option for official County purchases when the purchase order process or ePayables program is not an available option. For non-emergency travel, departments should, as the primary option, utilize a pre-approved travel agent to book and pay for travel expenses like airfare and lodging. Please note that all travel should be booked in accordance with the County’s Employee and Official Business Travel Expense Reimbursement Policy.

Vendors that do not accept checks, or require a credit card payment, should be paid via the ePayables program as the primary option. This payment method can be used for purchases such as fees for conference registration, seminars, workshops, newspaper subscriptions, memberships or similar where an online payment by credit card may be required. The County’s ePayables Program is administered by the County Comptroller.

For situations in which it is determined that the P-Card is the best alternative to procure specific goods for operational needs, the P-Card may not exceed \$15,000 in a monthly billing cycle for each P-Card issued.

See section II C. Prohibited / Unauthorized Purchases of this policy for detailed information on P-Card usage restrictions.



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B. Intent

This policy is intended to be interpreted consistent with and subject to applicable law and other related County policies. It supersedes all previous policies and/or memoranda that may have been issued from time to time on subjects covered in this policy or other policies that may contain provisions related to payment options. This policy is not intended to supersede or limit the County from enforcing programs or provisions in any applicable collective bargaining agreement.

C. Severability

If any section or provision of this document should be held invalid by operation of law, none of the remainder shall be affected.

¹ See Illinois Wage Payment and Collection Act, 820 ILCS 115/9.5.

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D. Jurisdiction

The Cook County Chief Financial Officer is authorized to develop and issue policies and procedures for County Purchasing Cards.

E. Areas Affected

This policy and the procedures associated with this policy applies to all elected and appointed Officials and Employees in departments, offices, institutions or agencies of the County, including but not limited to the offices and departments under the jurisdiction of the County Board President, the Board of Commissioners, Cook County Health and Hospitals System (“CCH”), Cook County State’s Attorney, Cook County Sheriff, Cook County Public Defender, Clerk of the Circuit Court of Cook County, Cook County Treasurer, Cook County Clerk, Cook County Assessor, Chief Judge of the Circuit Court of Cook County, Board of Review, the Office of the Independent Inspector General, the Cook County Land Bank Authority (“Land Bank Authority”), and the Public Administrator (hereinafter, “Agencies” or “Agency”) who use the purchasing card.

F. Nondiscrimination

Cook County prohibits the discriminatory application, implementation, or enforcement of any provision of this policy based on race, color, sex, age, religion, disability, national origin, ancestry, sexual orientation, marital status, parental status, military discharge status, source of income, gender identity or housing status, or any other protected category established by law, statute, or ordinance.

G. Misuse

Participation in the P-Card program is considered a privilege that carries the responsibility to ensure appropriate use and stewardship of funds. Inappropriate use of the P-Card may result in the loss of privilege, disciplinary action, and/or in termination of employment. Fraudulent use may additionally result in criminal prosecution. The employee will be held personally liable for all unauthorized purchases.

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H. Definitions

Acknowledgement Agreement Employees are required to sign an Acknowledgement Agreement indicating that they accept the terms of this Purchasing Card Policy. Failure to comply with this Policy and the related procedures may make the employee liable for any questionable expenditure and subject to disciplinary action up to termination of employment

Approving Official Authorized department approver as designated by the Bureau Chief or Department Head, CFO or Chief of Staff of Separately elected officials, unless otherwise noted, of the agency requesting a P-Card. They are responsible for approving the appropriateness of purchases and ensuring cardholders are adequately trained and comply with the rules and regulations of the program.

Bank means the entity issuing Cook County’s P-Card

Billing Cycle means the one-month period between statements issued by the Bank

Business Purpose A required statement that adequately describes the expenditure as a necessary, reasonable, and appropriate business expense for the County.

Cardholder Employee who is issued a Purchasing Card and has the responsibility to ensure adherence to this policy and that an unexpended and unencumbered appropriation is available for the Purchasing Card transaction.

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Cardholder Agreement cardholders are required to sign an Acknowledgement Agreement indicating that they accept the terms of this Purchasing Card Policy. Failure to comply with this policy and the related procedures may result in the employee being liable for any questionable expenditure and subject to disciplinary action up to termination of employment.

Cycle Limit means the spending limit that restricts the total value of purchases a Cardholder can make in one Billing Cycle.

Merchant Category Codes or “MCCs” means the specific Merchant Category Code, assigned by an acquiring financial institution, that identifies the primary goods or services a supplier provides.

Online Banking Program means the Bank’s online portal provides P-Card Program Administration Team the ability to view and download statement information, update and manage accounts, set limits and permissions etc.

Point of Sale Purchase Purchases made from a physical store, in person, online, or over the phone.

Purchasing Card (P-Card) For the purpose of this policy, a Purchasing Card (also known as a Procurement Card) is a County-issued charge card from a financial institution issued to a cardholder for the purpose of making authorized purchases on the County’s behalf.

P-Card Program means the program established by the County through which Cardholders make purchases on behalf of the County.

P-Card Program Manager The County’s Chief Financial Officer will have overall responsibility for the Purchasing Card policy and program.

P-Card Program Administrator The County Comptroller serves as the primary contact for the financial institution issuing Purchasing Cards and the cardholders and will ensure appropriate P-Card program internal controls are enforced and maintained.

Split Purchase A practice whereby one or more P-Card users or suppliers split a purchase into two or more transactions and/or purchase orders to circumvent the requirements of this policy, the Procurement Code, or other County policies.

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iExpense an Oracle module used to report and seek reimbursement of expenses paid by employees and to manage and reconcile P-Card transactions. It allows employees to enter, review and submit expense reports and established Oracle workflow will automatically route expense reports for approval and enforce reimbursement policies.

I. Tax Exempt Status

Expenditure must exclude sales tax to the extent permitted under law. Tax exempt certificates may be requested in advance of expenditures through the Office of the Chief Procurement Officer by emailing taxexemptrequest@cookcountyil.gov. Use of vendors who will not accept tax exempt certificates is prohibited absent exigent circumstances.

If the cardholder does not ensure their purchase is exempted from the Sales Tax charge, the cardholder may be personally responsible for remitting the amount of Sales Tax to the County.

J. Funding Authority

It is the responsibility of both the employee/cardholder and an approving official to verify available funding levels before incurring P-Card charges and prior to approving card transactions in Oracle *iExpense* module.

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K. P-Card Policy and Procedures

All employees have a duty to comply with the Purchasing Card Policy as well as all applicable laws, rules, regulations, and policies. In addition, employees have a fiduciary duty to be alert for any indication of fraud or improper conduct within their areas of responsibility. Bureau Chiefs, Department Heads and their designees must review usage thoroughly and timely.

1. Authority to Purchase.

Basic Criteria: The P-Card eligibility is based on agency-determined business needs and requires submittal of Cook County Purchasing Card Department Application to the Office of the CFO that will include the following details:

- a) Why a purchasing card is needed.
- b) Description of planned usage (i.e., the specific expenditure types, products/services)
- c) Estimated total daily and monthly purchases (in \$)
- d) Justification/explanation why the goods/services cannot be purchased via the normal purchase order/procurement process
- e) Information for the cardholder(s) that will have an assigned P-Card.
- f) Names of employees responsible for pre-approving, reviewing, validating, and/or reconciling the P-Card transactions within the department/agency, along with their title contact information and role assigned.
- g) Completion of required training (TBD)
- h) Completion of Cardholder Agreement (draft sample form attached)

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2. Expenditure Limits

The monthly dollar limit for all transactions within the 30-day bank billing cycle should not exceed \$15,000 per P-Card. Agencies may submit a request to the CFO in a memo format via email, with justification, for change in monthly cycle limits.

To minimize the risk of unauthorized use of the P-Cards, the Program Administrator will utilize Merchant Category Codes (MCCs) blocks. The banking industry assigns MCCs to each merchant or vendor based on the type of goods and services that each merchant or vendor typically provides. Based on the original P-Card Application and specific business needs of each department, the Program Administrator will ensure that a card profile permits only those authorized MCC groups that the cardholder needs for County business related purchases.

3. Prohibited/Unauthorized Purchases

The County P-Cards shall not be used for goods and services not directly related to official County business; to avoid compliance with the County’s Procurement Ordinances and procedures; to purchase goods and services that are not approved in the county’s budget; to purchase goods and services exceeding vendors’ contract or annual direct pay limits; or to make purchases not in compliance with the County P- Card user agreement or Employee Business and Travel Expense Reimbursement Policy.

MarketPlace is the preferred method for purchasing goods and services due to the ability to manage risk, compliance, and regulations along with pre-vetted suppliers, pre-negotiated pricing and efficiencies such as repeat ordering and a streamlined invoice and payment process. The use of P-Cards for these items should be limited to instances where there is substantial benefit, for example, a purchase within a short period of time to obtain cost savings, or an emergency purchase.

Splitting a purchase or using another P-Card, to circumvent the P-Card limits is prohibited.

Unsubstantiated expenditures may be reported to the Internal Revenue Service as additional taxable income.

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Cardholders will be responsible for the repayment of all charges incurred due to prohibited and/or unauthorized purchases. All such charges will be repaid in accordance with the Cook County Overpayment Policy.

Refer to the list of ineligible expenses in the Employee and Official Business and Travel Expense Reimbursement Policy at:

[Employee and Official Business & Travel Expense Policy 2.12.24.pdf \(cookcountyil.gov\)](#)

If an approving official believes that a certain type of restricted expenditure is critical, prior written pre-approval from the agency’s Chief Financial Officer or Chief of Staff will be required and must be included with the supporting documentation for payment approval.

L. Supporting Documentation

The Oracle iExpense module will be used for card transaction review and approval. Each cardholder’s profile in iExpense will be updated to reflect P-Card issued. The Bank will send a file with detailed card transactions to be loaded to iExpense and will be tied to each cardholder’s profile.

Once loaded, transactions will appear in cardholder’s queue as pending review. Cardholders must review each transaction in iExpense and ensure that each transaction is substantiated by the following supporting documentation, to be attached in iExpense:

1. Receipts for all non-travel expenses. Receipts should include vendor name, date of purchase, itemized with exact dollar amounts and a brief explanation of the County’s business purpose.
2. Additional supporting documentation (*packing slips, etc.*).
3. Receipts for travel expenditures must follow the Cook County Employee and Official Business and Travel Expense Reimbursement Policy.
4. In case of lost receipts, cardholders must complete and attach an [Affidavit for Lost Receipts](#).
5. Expenses that require pre-approval by the using agency must attach the signed [pre-](#)

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[authorization form.](#)

At the discretion of the agency approving official, and or their designee, the cardholder may be held responsible for any charges which do not have the appropriate supporting documentation. Failure to follow this policy repeatedly will be a violation of County policy and may result in suspension of card use or other disciplinary action.

M. Review and Approval

1. All P-Card transactions must be reviewed and substantiated after they are loaded in iExpense, and approved by an authorized department approver timely, in respect to the monthly p-card billing cycle, which ends on the last day of the month. Payment is due to the bank 7 days after, for combined balances of all p-cards under County’s program. Therefore, all p-card transactions dated on or before month end must be approved in iExpense no later than 7 days after month end.
2. Failure to complete verification and approvals timely may result in card suspension and/or expenditures (charges) reported as taxable income to the individual cardholder.
3. Cardholders will verify their own transactions and submit for review via iExpense to an authorized approver that meets the following criteria:
 - a. has authority over the account charged,
 - b. does not report directly or indirectly to the cardholder, and
 - c. is not the beneficiary of the transaction.
4. Approvers cannot approve their own expenditures.
5. Expenditures of Bureau Chiefs are to be reviewed/approved by the agency/office Chief of Staff or their designee. If these individuals are not designated approvers in iExpense, their physical signature must be obtained and attached as a backup for card transactions in iExpense.
6. Expenditures of Elected Officials are to be reviewed/approved by their CFO or Chief of Staff. If these individuals are not designated approvers in iExpense, their physical signature must be obtained and attached as a backup for card transactions in iExpense.

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7. The assigned Analysts in the Department of Budget and Management Services (DBMS), as the last level of approval in iExpense, will review completeness, support documentation, and ensure that the expenses are in accordance with policy, and proper level of approvals.

N. Roles and Responsibilities

1. P-Card Program Administrator (Comptroller) shall:

- 1) Provide Countywide training on card policies and procedures.
- 2) Serve as the main point of contact and liaison to the Countywide departments and elected officials authorized to use a P-Card and their staff, as well as to the issuing bank.
- 3) Maintain on file signed Cardholder Agreement forms and database of all cardholders.
- 4) Manage P-Cards via bank’s online system as follows:
 - Issue new cards based on approved applications.
 - Request replacement for lost/stolen cards, or when original card is expired (every three years)
 - Update cardholders’ information like cardholders name and address changes
 - Deactivate cards if no longer needed
- 5) Manage Card Controls via bank’s online system, such as:
 - Card credit limit changes (the spending amount on the card is controlled by the statement cycle. The limit will refresh the first day of the new cycle)
 - Merchant Category Classification (MCC) Controls-MCC’s - four-digit classification codes assigned to suppliers that denote the business or service type of the supplier. These codes are used by the Credit Card Networks for reporting, tracking, and restricting purchase types.

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- Restrict cash advance options - cash advance feature will be disabled. Cardholders cannot retrieve cash and no PIN is assigned.
 - Enable foreign transaction restrictions that will block transactions from any non-U.S. vendor.
- 6) Establish billing discrepancy procedures, including disputed transactions, promptly assist cardholders in the reporting of a card lost/stolen and work with the issuing bank if a fraudulent situation should occur.
 - 7) With guidance from the CFO, document internal controls, audits, and other measures to prevent and detect misuse or abuse of the cards. The CFO shall have the authority to make a final internal control procedure determination.
 - 8) Ensure P-Card transactions are reconciled timely by users.
 - 9) Develop internal procedures to ensure timely payment of card balances to the issuing bank.

2. Agency Chief Financial Officers/Bureau Chiefs or their designee

The Chief Financial Officer (or their designee) of each separately elected office and/or agency participating in the P-Card program is responsible for overseeing their card program. Duties include:

- 1) Submitting a P-Card Application to the P-Card Program Manager (County CFO) which contains the intended uses, proposed commodity limit(s), and a detailed justification for the request based on a needs analysis, budget constraints, job responsibilities, historical spending patterns, overall procurement practices, and the intended custodian(s).
- 2) Oversight and management of the P-Card usage for their department/agency.
- 3) Assign responsible cardholders and approver roles and responsibilities.
- 4) Maintaining an up-to-date listing of employees authorized for P-Card usage and ensuring completion of Cardholder Agreements and mandatory P-Card program training.
- 5) Establish internal procedures governing the administration and the use of the P-Cards to assure compliance with the terms of this policy, the Cardholder Agreement, County

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procurement policies and ordinances and the adopted budget.

- 6) Maintaining a strong system of internal controls for detection and deterrence of fraud, cardholder misuse or abuse of the P-Card. Internal controls include policies, procedures, and training in addition to spending limits and merchant category code restrictions.
- 7) Conduct periodic, at a minimum annual, review and self-assessment of the P-Card Program usage and compliance.
- 8) Monitor accounts for inactivity and request that Comptroller close P-Card accounts that are no longer needed.

3. Cardholders

Cardholder responsibilities include:

- 1) Completion of Cardholder Agreement form and required training prior to card usage.
- 2) Ensure adherence to this and all other applicable County policies and to understand terms and conditions for card usage.
- 3) Safeguarding of the physical P-Card and card information. Read additional detailed information in section H. Security of P-Cards of this manual.
- 4) Takes responsibility for all charges made on the P-Card.
- 5) Maintains adequate documentation to verify and support all P-Card transactions to facilitate reconciliation and approval of card transactions in Oracle iExpense, including:
- 6) Keeping itemized receipt(s) for each purchase transaction and the official business explanation for each; itemized packing slips or shipping orders or similar are acceptable if itemized receipt is not available.
- 7) Maintaining a P-Card Transaction Log (draft sample attached) to track the usage of the card and facilitate efficient review and approval by the approving official.
- 8) Report lost or stolen card or confidential card information to the issuing bank immediately

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and notify his/her supervisor and the Comptroller no later than the next business day.

4. *Approving Official*

Approving Official must ensure that adequate documentation has been provided to support that the expenditures are valid County business expenses.

The Approving Official responsibilities include:

- 1) Ensure timely submission of P-Card expense reports via iExpense.
- 2) Proper forms/documentation and reasons for purchases were provided.
- 3) Review a transaction log provided by cardholder and match it to receipts for each purchase.
- 4) Ensure itemized receipts were provided.
- 5) If a receipt has been lost and a duplicate cannot be obtained, submit Affidavit for Lost Receipts. Use of the Affidavit for Lost Receipts more than three times in one fiscal year will result in suspension of account privileges at the discretion of the Comptroller from a month to a year and/or repayment of expenses by the cardholder to the County.
- 6) Documentation of any pre-approvals for expenditures, if applicable.
- 7) Proper allocation of expense according to budget procedures and to the proper budget category; and
- 8) Escalation of any expense that appears to be out of the ordinary (i.e., abnormally large expenses, poorly documented expenses, purchases not generally required for normal Park business) for a more focused review.

5. *County Auditor*

The internal County Auditor shall define and enforce audit requirements and perform:

- 1) Periodic cardholder audits to confirm adherence to program guideline

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2) Perform random review of the P-Card program (controls, limits, exceptions)

O. Monthly Reconciliation and Payment to Bank

- 1) Cardholders must keep daily/monthly log and reconcile transactions in iExpense on a regular basis. Approving Official reviews and approves submitted P-Card expense reports via iExpense on regular basis.
- 2) County Comptroller monitors unreconciled P-Card transactions in iExpense and follows up with cardholders and authorized approvers to address any unreconciled transactions. CFOs or Bureau Chiefs will be contacted as necessary for escalation to ensure timely submission of approved expenses.
- 3) County Comptroller ensures issuing bank is paid timely based on the established due dates for the billing cycle. The payment is made on the corporate level for all cardholders, meaning one payment is due monthly for all issued cards.
- 4) The issuing bank will debit the designated County account according to the payment terms and billing schedule defined in the contract and the Comptroller is responsible to ensure the account is funded accordingly for the scheduled payment.
- 5) Comptroller will also reconcile general ledger credit card clearing account monthly.

P. Security of P-Cards

- 1) Only authorized employees may use a County P-Card for purchases.
- 2) The cardholder will be responsible for the security of the P-Card at all times and shall take care to ensure that others do not have access to confidential card account information.
- 3) A cardholder should routinely check that they are in possession of their card.
- 4) Carefully review monthly statements and promptly report unauthorized use.
- 5) Never provide your card or account number to anyone to make transactions on your behalf.
- 6) Never respond to unsolicited emails or telephone calls requesting card account

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information.

- 7) If any P-Card information is lost or stolen, it is the responsibility of the cardholder to immediately notify the issuing bank within 24 hours. The bank must be contacted directly via phone so that the card(s) can be closed correctly, and the appropriate procedures are handled promptly. Until the bank is notified, the County is liable for all purchases made. The Comptroller must also be notified, as soon as possible, if the card is lost, stolen or damaged within 24 hours.
- 8) Any suspected fraud or misconduct with respect to County purchases should be reported to one's supervisor, the Chief Financial Officer, and/or Office of the Independent Inspector General.

Q. Returns, Credits and Dispute Resolution

If there is a problem with a purchased item or billing resulting from the use of the P-Card, the cardholder and department should:

- 1) Contact the Comptroller's office and report the issue. Based on the specific situation, the Comptroller will provide guidance on next steps to initiate a dispute with the issuing bank.
- 2) The bank must receive a formal dispute request from the program administrator (Comptroller no later than 60 days following the statement date that the transaction posts.
- 3) The dispute process can take anywhere from 30 – 90 days. The disputed amount is due as part of the cycle in which it posts and can incur late fees or past due status if not paid per the terms of the contract. If the result of the dispute finds in the cardholder's favor, the card will be credited back in the amount of the disputed transaction.
- 4) If the cardholder/department needs to return a purchased item for any reason, the cardholder should send the item back to the merchant, request a credit to the P-Card account and reflect it in the reconciliation along with attaching the credit receipt.
- 5) All returned purchases must be credited back to the P-Card or by check made payable to "COOK COUNTY" for the returned item.

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6) No employee can receive cash for a returned item.

R. Training Requirements

All Agency Chief Financial Officers, Bureau Chiefs or their designees, Approving Officials

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Cardholders shall be trained on this policy and must show proof of completed training when a new card is received.

S. Exhibit A

Exhibit A contains a list of approved departments, agencies, and elected officials who are eligible for a P-Card.

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Exhibit A

Below is a list of approved P-Card user departments and card limits. This list will be updated periodically as needed by the Comptroller’s Office.

Number	Agency/Department/Elected Official	Monthly Limit	Date
1	Bureau of Administration	\$15,000	
2	Bureau of Finance	\$15,000	
3	Bureau of Economic Development	\$15,000	
4	Bureau of Human Resources	\$15,000	
5	Bureau of Technology	\$15,000	
6	Bureau of Asset Management	\$15,000	
7	Cook County Health	\$15,000	
8	Secretary to the Board	\$15,000	
9	Public Defender	\$15,000	
10	Clerk of the Circuit Court	\$15,000	
11	County Assessor	\$15,000	
12	County Clerk	\$15,000	
13	Sheriff	\$15,000	
14	Treasurer	\$15,000	
15	Office of the Chief Judge	\$15,000	
16	State’s Attorney	\$15,000	
17	Board of Review	\$15,000	
18	Office of the President	\$15,000	
	Total	\$270,000	