DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES ANNUAL REPORT ON GOALS, OBJECTIVES AND POLICIES

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Program ID/Title: AGS 240/State Procurement

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I. Goals

To best serve the taxpayers of Hawaii and stakeholders in State and County agencies by providing effective and efficient procurement and inventory management practices, with quality, timeliness, maximizing competition, and maintaining integrity. To achieve the greatest value from procurement resources while creating a procurement environment and framework which nurtures a strong vendor community and peak vendor performance; to coalesce public-private partnerships enhancing the services and products provided to the citizens of the State of Hawaii.

II. Objectives and Policies

A. Procurement Training.

Provide training for all purchasing personnel through development of a Training Branch within SPO to establish and implement the Acquisition Academy and Center for Excellence ('the Academy'). The training division will consist of a Training and Development Director and three Training and Development Officers with expertise/experience in both training and Acquisition/procurement. The Academy will serve as 1) a vehicle where formal procurement delegation training can be obtained on-demand, any time, throughout the state 2) a vehicle for training vendors and small businesses on how to do business with the state 3) a receptacle of forms, templates, whitepapers and most importantly, best practices, 4) a coaching program for a core of 'departmental super-users' to develop a higher level of expertise at the department level; 5) a professional community for stakeholders in procurement /acquisition to collaborate and consult.

Integrate and coordinate training on related subjects such as risk management, audits, and green purchasing. Similarly, provide training for vendors seeking to do business with the State and counties.

B. Electronic Procurement Systems.

Continue to integrate electronic purchasing to automate procurement processes, reduce procurement cycle times, and increase the competition for goods and services. Consolidate procurement notice and award databases with **HIePRO** for the following purposes: 1) create a more user friendly single point of access for state procurement personnel; 2) create a more user friendly single point of access for vendors and the public searching for opportunities to do business with the state and searching contract

awards; 3) create a single source for accessing procurement data for analysis to enable strategic sourcing.

C. Purchasing Card (pCard) Program.

Continue to provide training and support for departments to maintain and increase levels of efficiency for small purchase procedures with the use of pCards. Conduct annual meeting of fiscal officers to network, foster open discussion of issues or concerns, share best practices, and provide management reports to assist in the analysis of purchasing activities. Integrate the pCard as the preferred method of payment into price list contracts and HIePRO purchases.

D. Procurement Resources.

Provides a variety of price and vendor list contracts that agencies benefit by receiving discounts on goods and services due to volume purchases. In addition there are the efficiency savings – the administrative, procurement and contract management realized by each agency or jurisdiction, rather than having to solicit individual contracts, resulting in multiple contracts for the same commodity or service. Instead these processes are managed by the SPO, and all participating jurisdictions and agencies are the beneficiaries of cooperative purchasing.

Provides consultation and advisory services to departments, its user agencies and other jurisdictions as the subject matter experts on the State Procurement Code. Additionally, the SPO provides procurement services to individual stakeholders by conducting procurement that impacts the State that results in systemic value to the State's business activity.

Assist, advise, guide, and train purchasing agencies relating to planning and procuring health and human services. Review and process Executive Branch requests for chief procurement officer approval. Conducts procurement investigations, as necessary. Maintains databases: 1) awards/contracts; 2) request for proposals; 3) requests for chief procurement officer approval; and 4) planned purchases reports.

E. Procurement Compliance & Legislative Actions.

To provide Policy and Compliance consultation to State agencies and the public on policies and plans on statewide procurement procedures, standards, and guidelines to ensure compliance with all procurement statutes, rules, directives and policies. As stewards of the Procurement Code, SPO shall continue to actively participate in the legislative process by preparing legislation and advising on revision to the procurement code.

The policy and Compliance section of SPO strives to maximize their efforts in the reviewing of bills during each legislative session, provides guidance to properly implement the provisions of the legislation through drafting of administrative rules.

The following is a list of other objectives that the Policy and Compliance Section is engaged in: University of Hawaii Construction Audits, development of Protest Statistics, Chief Procurement Officers requests for approvals for Sole Source, Procurement Exemptions, Emergency Procurement, Restrictive Specifications, Contract Extensions, Procurement Violation Investigations, Delegation and Training, Contractors Suspension and Debarment and Hawaii Compliance Express.

F. Inventory.

Continue to ensure accurate inventory reporting and compliance to policies and procedures pertaining to the management and recording of State property. Maintain the acquisition and transfer of property document files to confirm and verify the transferring of property between State agencies is properly documented. Review property disposal applications submitted by the executive departments, excluding Department of Education, Hawaii Health Systems Corporation, Office of Hawaiian Affairs, and University of Hawaii, to ensure conformance to the requirements of the rules and policies and procedures pertaining to proper disposal of State property.

G. Travel.

Provide consistent policies and procedures for coordination and arrangement of travel for authorized business travel. Assist, guide, and train state personnel relating to travel coordination and arrangements. Conduct procurements relating to travel including, car rental and inter-island airfare.

H. Agile Acquisition.

To best serve the State Agencies and Executive Branch Departments by researching and supporting agile acquisition initiatives that streamline processes and create a more efficient and effective procurement system. To actively work on increasing and improving communications across State Agencies, to share and incorporate best practices, and share lessons learned. To actively work on improving the culture of discussion and cooperation between State Agencies to offer consistent practices, cost savings and enhance timeliness of procurements. To participate in strategic actions to enhance the economic growth of Hawaii and support innovative, sustainable programs that enhance the lives of the people of Hawaii.

III. Action Plan with Timetable

A. Procurement Training.

1. Past Year Accomplishments

- a. Commenced on-demand training
- b. Perpetuated training programs for employees and vendors.
- c. Reviewed and updated training class descriptions/synopsis.

- d. Reviewed and updated training materials, forms and website.
- e. Reviewed amended chapters 103D and 103F, Hawaii Revised Statutes (HRS), other related HRS such as chapters 103, 92F, 84, and applicable administrative rules for updates to training materials.

2. One Year

- a. Create SPO Training Division and Statewide Acquisition Academy & Center of Excellence
- b. Create 1 position- Training and Development Director
- c. Obtain reference materials and training for SPO staff in the most current procurement trends and procedures, including IT procurement and intellectual property,
- d. Procure for Learning Management System (LMS) -full or interim (funding and ERP implementation-dependant) and begin implementation
- e. Establish clear definitions of roles in procurement
- f. Begin moving existing training to the LMS
- g. Begin basic training on acquisition life cycle statewide for procurement staff

3. Two Years

- a. Scan business, training and other environments for new training platforms, models and processes.
- b. Begin developing testing component for existing training for verification of learning by users and for analysis for modification of training
- c. Create Reference Library Structure and begin moving materials
- d. Hire Training and Development Director if not already done so
- e. Develop procedures for incorporating testing requirement and passing to receive credit for taking training courses
- f. Complete moving all existing training into LMS
- g. Develop course in acquisition planning
- h. Continue building reference library
- i. Begin visiting departments to assess procurement training needs and identifying potential superusers
- j. Begin updating existing training with newer interactive format
- k. Develop course in Contract Management

4. Five Years

- a. Develop and hire two Training & Development Officers (total staff 3)
- b. Develop and implement Coaching and Train-the-Trainer programs for department 'Superusers'
- c. Implement full on-line Resource and Best Practices Library
- d. Develop first advanced course for departmental superusers.
- e. Complete updating older training with more interactive format

- f. Complete implementation of testing for core procurement courses
- g. Develop and implement Certification program
- h. Develop and implement courses in Market Research, Intro to Price Analysis, Intro to Cost Analysis, Contract Management, and Contract Administration
- i. Develop advanced courses in Acquisition Planning, Contract Management
- j. Develop and implement full-blown blended learning programs, encompassing scheduled courses, webinars, on-demand interactive training and in-person training
- k. Develop and begin implementation of metrics reporting on effectiveness of training programs
- 1. Develop online community to discuss acquisition issues and attract talent
- m. Hold first meeting of professional acquisition community
- n. Begin planning for first Acquisition Conference
- o. Begin planning for internship program
- p. Revisit departments to assess progress and needs and provide technical assistance
- q. Scan business, training and other environments for new training platforms, models and processes.

B. Electronic Procurement Systems.

1. Past Year Accomplishments

- a. Completed stage 1 development and implementation of new State of Hawaii eProcurement System.
- b. Continued eProcurement training. .
- c. 2013 Digital Summit Governance Award awarded to SPO for the eProcurement system
- d. eProcurement team State Team of the Year award

2. One Year

- a. Continue development of the State of Hawaii eProcurement System) to include automated public site for procurement notices of solicitation and award.
- b. Develop specifications and datamapping for consolidating the 9 databases for solicitation notices, awards and CPO approvals with eProcurement
- c. Market and provide training on eProcurement to State and county personnel and the vendor community.
- d. Begin expansion of eProcurement to include Request for Sealed Bids, Request for Proposals.

3. Two Years

- a. Continue expansion of eProcurement for all procurements relating to 103D goods, services & construction and expand to procurements of health and human services.
- b. Continue development of consolidated procurement notices and contract awards database for goods, services and construction and Health and Human Services and integration with **eProcurement**
- c. Begin testing integrated databases for implementation
- d. Begin development of reports for analysis of acquisition and spend for purposes of planning and strategic sourcing.
- e. Continue to provide training on eProcurement to State and county procurement personnel and the vendor community.

4. Five Years

- a. Complete testing of consolidation of all databases for solicitations and contract awards with eProcurement and begin implementation
- b. Develop and test consolidation of public notice and requests for approvals from the Chief Procurement officer for all requests for goods, services and construction and health and human services
- c. Complete development and testing of reports for analysis of acquisition and contract spend;
- d. Complete expansion of eProcurement to all methods of procurements Complete review of additional eProcurement functionality needed and also new technologies in eProcurement.
- e. Begin development of specifications for contract tracking system to provide dashboards for vendors, state personnel and the public.

C. Purchasing Card (pCard) Program.

1. Past Year Accomplishments

- a. Continued to review, develop and amend pCard training material.
- b. Continued training for department pCard administrators, alternates and cardholders.
- c. Continued marketing and use of reporting capabilities.
- d. Continued marketing and use of pCard program features.
- e. Integrated and implemented new program features (Enhanced Merchant Reporting and MasterCard Business).
- f. Implemented new database for tracking Requests to Use pCard for Blocked Purchases.

2. One Year

- a. Update State of Hawaii Purchasing Card Program Procedures Manual.
- b. Review and update training material.
- c. Periodically audit departments for compliance with pCard usage.

- d. Continue training for cardholders and administrators.
- e. Continue marketing and use of reporting capabilities.
- f. Continue marketing and use of pCard program features.

- a. Continue training for cardholders and administrators.
- b. Continue marketing and use of reporting capabilities.
- c. Continue marketing and use of pCard program features.
- d. Re-solicit for services to furnish and implement a pCard program for the State of Hawaii.

4. Five Years

- a. Perpetual updating contact information for all pCard administrators/alternates.
- b. Expand use of reporting capabilities
- c. Audit departments for compliance with pCard usage

D. Procurement Resources

Past Year Accomplishments (FY14)

In FY2014, the SPO conducted procurements and awarded contracts to support the State's initiative to improve government operations and allow employees tools to work more efficiently and provide better services to taxpayers. The supporting contracts provide program management consultation and support and enterprise architecture support for the planned enterprise resource planning (ERP) system that is intended to change and modernize the outdated and antiquated systems, eliminating redundant data entry and automating manual processes. Other contracts awarded provide ERP planning and management support and program management support along with organizational change management support, again all part of the ERP solution building the framework to the State's business transformation.

In FY2015, the SPO conducted and awarded a contract which will result in a Uniform Chart of Accounts (UCOA). The UCOA will provide the State the ability to support enterprise-wide and departmental reporting, which will eventually be the coding system used in the ERP Solution.

Two Year (FY15 &FY16)

In the next two years, it is the intent to award, through procurement by SPO, to potentially enter into contract with two (2) Fit-Gap Contractors who will review the State's current system and propose their solution as the ERP System. The single awardee will provide the State with an integrated financial and human resources

management system. The State of Hawaii's future ERP system will include (7) functions, including:

- 1. Financial Management
- 2. Acquisition Management
- 3. Asset Management
- 4. Grants Management
- 5. Human Resources Management
- 6. Payroll
- 7. Time and Attendance.

In addition to the ERP, the SPO is currently conducting source selection for services and technology to modernize the State's tax system. The resulting contract will modernize processes to improve services to the community and provide efficient tax collection services.

Lastly, the SPO plans to solicit for services of a consultant to perform business process assessment to review the State's current procurement processes and procedures which will result in an Interactive State Procurement Manual.

Five Years (FY15 to FY19)

In the following next five (5) years, the SPO will continue to support the initiatives with various IT and other procurements that will provide the needed changes for the State of Hawaii.

Health and Human Services: Assist, advise, train purchasing agencies in the planning and procuring of health and human services.

1. Past Year Accomplishments

- Established the Health and Human Services Action Team (HHSAT):
 State purchasing agency and private provider focus groups to develop and implement best procurement practices.
- b. Continuation of webinar training on planning and procuring of health and human services
- c. Online planned purchases database for purchasing agencies to report upcoming health and human service procurements.

2. One Year

- a. Complete on-demand training for purchases of health and human services for state agencies and providers.
- b. Conduct written survey on procurement processes.
- c. Continue meeting with the HHSAT focus groups.
- d. Conduct a question and answer discussion session with purchasing agencies on topics of interest.

- a. Update on-demand training on purchases of health and human services.
- b. Continue meeting and working with HHSAT focus groups.
- c. Amend HAR Chapter 103F, Purchases of Health and Human Services.

4. Five Years

- a. Conduct random review at the department level of health and human service procurements.
- b. Electronic procurements for health and human services.

E. Procurement Compliance & Legislative Actions

1. Past Year Accomplishments

- a. Continue to review legislative bills, and develop testimonies. 2014 Legislative session review approximately 94 Bills that effected procurement.
- b. Continue to respond and make recommendations to Chief Procurement Officers requests which are submitted by the Executive Branch. Request reviewed: Sole Source 88; Procurement Exemptions 32; Emergency Procurement 32; Restrictive Specifications 3; Procurement Violations 61; and Contract Extensions 43.
- c. Continue to provide guidance through Procurement Circulars. Procurement Circulars written 15.
- d. UH Audits. Created MOA between UH/SPO regarding Act 87, SLH 2013 for SPO to review UH's Construction project and established process to communicated and work with UH to review their Constructions procurements. Completed 18 Solicitation reviews in FY 2014. Networked with DAGS-PWD to be the Construction subject matter expert to review UH's specifications for each solicitation and created a Construction Site Visit checklist for SPO's site visits to UH construction projects.
- e. Protest Statistics Continue to process SPO-043, Report of Procurement Protest Form, in order for Agencies to submit consistent/standardized data; tracked Executive Departments and CPO Jurisdictions Protests to submit a report to Legislature pursuant to Act 173, SLH 2012.
- f. Continue to respond to questions from government agencies and the public on HCE compliance.
- g. Suspension and Debarment. Successfully issued Procurement Circulars, as needed, to notify Agencies/CPO Jurisdictions, which Vendors have been suspended/debarred and the suspension period of each Vendor. Issued Procurement Circulars, on behalf of DLIR, to notify Agencies/CPO Jurisdictions, which Vendors have been suspended pursuant to 104, Wages and Hours of Employees on Public Works.

- h. Responding to House Concurrent Resolution 176 (SLH 2014), which requested that the SPO conduct a study on the feasibility of requiring past performance as a factor in awarding any public contract, including low-bid invitation for bid ("IFB") contracts. The SPO is preparing a comprehensive report to the 2015 legislature that includes research on applications of past performance through current procurement statutes and rules, research on Federal and select states' past performance initiatives, conducting a survey stakeholder meetings, and identifying possible clarifications or changes to statutes or administrative rules regarding implementation of past performance.
- i. Initiated research to start drafting new administrative rules to give effect to the small business set-aside established in HRS §§103D-901 through -906.
- j. Presenting three new legislative initiatives that address HAR compliance issues: 1) specifically authorizing the re-instatement of HAR §3-122-66 to provide a waiver process when there are less than three qualified individuals for professional service; 2) specifically authorizing a clarification communications process during the initial evaluation period in proposals; 3) clarifying that the legislature intends past performance to be considered in responsibility determinations of all public contract awards.
- k. Proposed administrative law changes to address compliance issues: 1) aligning the inventory responsibility language in HAR 3-130 to be incompliance with HRS language; 2) removing the ambiguous "Etc." from HAR §3-120 Exhibit A; 3) repealing HAR §3-122-66 to clarify the section has been invalidated by a recent Hawaii Supreme Court Decision; 4) creating a definition and process for clarification communications during proposals; 5) clarifying ethical expectations for all procurements by inserting additional language with procurement exemptions; 6) creating a clearer responsibility determination process that may include relevant and recent past performance.
- 1. Implementing Procurement Policy Board's approved interim rule changes pursuant to HRS §103D-202 for HAR §§ 3-120-4 and Exhibit A, 3-122-66, 3-122-14, and 3-130.
- m. Implementing Procurement Policy Board's rulemaking changes pursuant to HRS chapter 91 for HAR §§ 3-120-4 and Exhibit A, 3-122-14, and 3-130.
- n. Consulted with numerous departments and agencies on proposed legislative initiatives that would involve procurement on policy, compliance, and implementation concerns.

2. One Year

- a. Continue to review legislative bills, and develop testimonies.
- b. Continue to respond and make recommendations to Chief Procurement Officers requests which are submitted by the Executive Branch.
- c. Continue to provide guidance through Procurement Circulars.

- d. Continue to conduct UH Audits.
- e. Continue to process SPO-043, Report of Procurement Protest Form, to submit a report to Legislature pursuant to Act 173, SLH 2012 by 2016 legislative session.
- f. Continue to respond to questions from government agencies and the public on HCE compliance.
- g. Suspension and Debarment. Successfully issue Procurement Circulars, as needed, to notify Agencies/CPO Jurisdictions, which Vendors have been suspended/debarred and the suspension period of each Vendor. Issue Procurement Circulars, on behalf of DLIR, to notify Agencies/CPO Jurisdictions, which Vendors have been suspended pursuant to 104, Wages and Hours of Employees on Public Works.
- h. Continue to consult with other departments and agencies regarding implementation of procurement policy.

- a. Develop a SPO Standard Operating Procedure Manual to establish clear and well defined procedures on recording and investigating possible procurement violations and procurement audits. This SPO manual will lead to greater efficiency and consistency while conducting investigations and audits. In order to accomplish this goal, standard criteria and charting the procedures need to be developed as well as gathering stakeholder input through emails, meetings, and phone calls.
- b. Continue to review legislative bills, and develop testimonies.
- c. Continue to respond and make recommendations to Chief Procurement Officers requests which are submitted by the Executive Branch.
- d. Continue to provide guidance through Procurement Circulars
- e. Continue to provide Procurement Circulars on Suspension and Debarment.

4. Five Years.

- a. Continue to review legislative bills, and develop testimonies.
- b. Continue to respond and make recommendations to Chief Procurement Officers requests which are submitted by the Executive Branch.
- c. Continue to provide guidance through Procurement Circulars
- d. Continue to provide Procurement Circulars on Suspension and Debarment.

F. Inventory

1. Past Year Accomplishments

- a. Processed 1,654 state property transfers, which was valued at \$5,309,000.
- b. Processed 31,438 inventory transactions.
- c. Processed addition inventory transactions, which was valued at \$569,374,000.

d. Involved in creating inventory workflows for the interim asset management system.

2. One Year

- a. Continue to process state property transfers.
- b. Continue to process inventory transactions.
- c. Continue to process addition inventory transactions.
- d. Continue involvement in creating inventory workflows for the interim asset management system.

3. Two Years

- a. Continue to process state property transfers.
- b. Continue to process inventory transactions.
- c. Continue to process addition inventory transactions.
- d. Continue involvement in creating inventory workflows for the interim asset management system.
- e. Update the inventory system user manual.

4. Five Years

- a. Continue to process state property transfers.
- b. Continue to process inventory transactions.
- c. Continue to process addition inventory transactions.
- d. Update the inventory system user manual.
- e. Statewide implementation for the usage of more technologically advanced interim asset management system, which will streamline the inventory process.

G. Travel

1. Past Years Accomplishments

- a. Completed on-demand training for travel policies & procedures.
- b. Assisted travelers and travel coordinators in making travel arrangements and calculations of per diem, travel time off, and miscellaneous reimbursements.
- c. Reviewed and extended Intra-State Car Rental Contract.
- d. Reviewed and extended Inter-Island Airline Pricing Contract.

2. One Year

a. Continue assisting travelers and coordinators with travel arrangements and calculations of per diem, travel time-off, and reimbursements.

- b. Conduct survey of state and county employees regarding the Commercial Car Rental Contract; its use and effectiveness.
- c. Conduct in-person training for departments on an as needed basis.

- a. Update on-demand training.
- b. Amend HAR 3-10 to update language.
- c. Audit departments for travel procedure compliance.

4. Five Years

- a. Conduct market research for the feasibility of a travel management contract.
- b. Conduct market research for online travel approvals.
- c. Update on-demand training.
- d. Continue assisting travelers and travel coordinators.

H. Agile Acquisition

1. Past Year Accomplishments

- a. Procure the IT ERP as part of the IT Transformation State-wide Initiative.
- b. Publish an RFI to create a Contingency Contractor Category List of 30 categories for the SPO Disaster Preparedness Initiative.

2. One Year

- a. Collaborate with subject matter experts and champions to design a successful program to implement small business set-asides across the State.
- b. Continue to work with the Executive Branch Leadership to award the IT ERP as part of the IT Transformation State-wide Initiative.
- c. Develop a digitized, online Procurement Manual with process mapping, samples, templates and guidance.
- d. Engage in discussions to develop a business model for Hawaii that will assist in diversifying revenue streams, assist local business, and promote sustainability in the research and development of sustainable, economically viable innovations that will enhance the lives of the people of Hawaii.
- e. Create a web page that offers instruction and information for Disaster Preparedness and Contingency Contracting during a Disaster, to include FEMA templates and instructions, a list of contractors by category to call for specific requirements, state-wide price and vendor list links.

3. Two Years

- a. Submit legislation that supports the small business set-aside plan.
- b. Publish online Procurement Manual.
- c. Continue to work with the Executive Branch Leadership to award the IT ERP as part of the IT Transformation State-wide Initiative.
- d. Continue to support sustainable, economically viable programs across the State.
- e. Link the SPO Disaster Preparedness page with the HI Emergency Management Division's initiative.

4. Five Years

- a. Develop a Procurement Tracker system that allows for transparency across the acquisition lifecycle. Align the Tracker system with the digitized Procurement Manual.
- b. Obtain business analytics to further define and improve the small business set-aside program.
- c. Continue to support sustainable, economically viable programs across the State.
- d. Continue to work with the CIO in regards to the IT Transformation Statewide Initiative.
- e. Create a trained, ready workforce that can manage contingency contracting during a disaster. Integrate a working plan to partner with Alaska procurement specialists in Contingency exercises.

IV. Performance Measures

A. Customer Satisfaction measures

- 1. Customer satisfaction surveys are being done with attendees of procurement training presentations.
- 2. Other stakeholder surveys are conducted as needed.
 - a. HCR 176, SLH 2014 directed the SPO conduct a study on the feasibility, necessary processes, and costs relative to requiring the consideration of past performance as a factor in awarding public contracts, including low bid contracts. In response, the SPO conducted a survey and is working with government officials, contractors, and other procurement policy stakeholders to gather and share experiences, perceptions, opinions, and ideas on past performance accountability. Survey information was compiled and shared with the Procurement Policy and will be included in the SPO's report to the legislature responding to HCR 176, SLH 2014.
 - b. A stakeholder input survey will be conducted to collect feedback from subject matter experts to design a successful program to implement small business set-asides established in HRS §103D-901 through -906.

3. Program target groups (including purchasing jurisdictions serviced via cooperative purchasing price and vendor list contracts, statewide inventory accounts, number of agencies issuing health and human service solicitations, and number of purchasing card holders) are being measured annually.

B. Program Standard measures

- 1. Program reviews are being done on SPO's training program and HIePRO as well as on other procurement and inventory functions. For example, other reviews cover compliance of inventory reporting in the State's financial statements and number of purchasing jurisdictions serviced by cooperative purchasing price and vendor list contracts.
- 2. pCard usage and expenditures are analyzed using reports from the pCard system to review the number of purchasing cards being used by the agencies and the dollar value of pCard purchases annually. Also reviewed is the ratio of pCard transactions over purchase order transactions.

C. Cost Effectiveness measures

- 1. Reviews are being done on monetary savings resulting from the awarding of contracts using the HIePRO. Similarly, trend analyses are being accomplished for monetary savings stemming from the awarding of price and vendor list contracts.
- 2. Monetary savings from the transfer of State property between custodians are being measured.
- 3. Rebates received for purchasing card transactions provides an actual total of funds returned to the State.