	Massachusetts partment of Correction POLICY	Effective Date 5/15/2025 Annual Review Date 5/15/2025	Responsible Division Deputy Commissioner, Administration
Policy Name 103 DOC 476 CANTEEN AND VENDING MACHINE OPERATIONS AND EXPENDITURES		M.G.L. Reference: M.G.L. c 124, §§ 1(c) and (q) DOC Policy Reference: 103 DOC 340; 103 DOC 343; ACA/PREA Standards: 2-CO-1B-12; 2-CO-1B-13; 2-CO-1B-14; 5-ACI-1B-7; 5-ACI-1B-10; 5-ACI-1B-12; 5-ACI-1B-18	
Attachments Yes 🛛 No 🗆	Library Yes ⊠ No □	Applicability: All Staff	
Public Access Yes $\boxtimes$ No $\square$		Location: Department Central Policy File Institutional Policy File	

#### **PURPOSE:**

The purpose of this policy is to establish Massachusetts Department of Correction (Department) policy and procedures for canteen, vending machines and associated expenditures.

## **RESPONSIBLE STAFF FOR IMPLEMENTATION AND MONITORING OF POLICY:**

Deputy Commissioner, Administration Executive Director, Administrative Services Division Superintendents Fiscal Officers

#### **CANCELLATION:**

This document cancels all previous Department policy statements, bulletins, directives, orders, notices, rules and/or regulations regarding the operation of canteens, vending machines, and expenditures which are inconsistent with this policy.

#### **SEVERABILITY CLAUSE:**

If any part of this policy, for any reason, is held to be in excess of the authority of the Commissioner, such decision will not affect any other part of this policy.

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#### <u>476.01</u> <u>DEFINITIONS</u>

<u>Audit</u>: An examination of agency or institution operations, programs or accounts which is conducted by a person, or persons not directly involved in the area being assessed. An independent audit results in an opinion regarding the adequacy of the area assessed.

<u>Canteen Item</u>: Any saleable product, commodity, foodstuff, etc., which is enumerated by retail pricing or trademark. Every item which appears on the institutional canteen list, whether distinguished by price or brand, is considered unique for quantitative purposes.

<u>Charter</u>: A document detailing who will manage the revenues collected and for what purposes those revenues may be expended.

<u>Civil Commitment</u>: For purposes of this policy, the term Civil Commitment shall mean any person admitted for evaluation or civil commitment to the Bridgewater State Hospital, any Massachusetts Treatment Center resident pursuant to M.G.L c. 123A as a Sexually Dangerous Person who is not serving a criminal sentence, and any person civilly committed to the Massachusetts Alcohol and Substance Abuse Center or MCI-Framingham.

<u>Contractor</u>: A person or organization that agrees to furnish materials or to perform services for an institution or jurisdiction at a specified price. Contractors operating in Department institutions are subject to all applicable rules and regulations for the institution.

Department: The Massachusetts Department of Correction.

<u>Department Liaison:</u> An individual designated by the Executive Director of the Administrative Services Division who is responsible for the fiscal bookkeeping functions of the Department Law Library Account.

<u>Department Program Account (DPA)</u>: A Department account established to manage funds used to supplement existing programs or funding for new programs for incarcerated individuals and civil commitments throughout the Department. There shall be one (1) central DPA.

<u>Executive Director, Administrative Services Division:</u> The Central Office Administrator whose duties include the overall management of incarcerated individual and civil commitment funds.

<u>Employee Benefit Fund Account (EBF Account)</u>: An account utilized to manage funds held for the benefit of employees. There may be both an institutional and a central EBF Account and each shall have a separate identification number on IMS which is determined by the Director of Support Services.

<u>Fiscal Liaison:</u> An individual designated by the Executive Director of the Administrative Services Division who is responsible for the fiscal bookkeeping functions of the Department Program Accounts.

<u>Incarcerated Individual</u>: A committed offender or such other person as is placed in custody in a correctional institution in accordance with law.

<u>Incarcerated Individual/Civil Commitment Benefit Fund Account (IICCBF Account)</u>: An account utilized to manage funds held for the benefit of incarcerated individuals and civil commitments. There may be both an institutional and a central IICCBF Account and each shall have a separate identification number on IMS which is determined by the Director of Support Services.

<u>Secure Delivery System (SDS)</u>: A secure system that provides for the delivery of canteen goods from a vendor to an incarcerated individual or civil commitment within the Department's custody.

#### 476.02 GENERAL POLICY

Department institutions receive canteen services from a centralized contract. These services are in the form of a Secure Delivery System (SDS) where incarcerated individuals and civil commitments can purchase from an approved list of items not provided by the institution. A centralized contract for vending machines is also maintained to allow vending machines to be located on institutional property and provide food and miscellaneous items to incarcerated individuals, civil commitments, employees, and the public. It is the policy of the Department to standardize and establish uniform procedures for the expenditures of monies attributable to commissions earned from canteen services and vending machines.

#### 476.03 SECURE DELIVERY SYSTEM

- A. The SDS is a pre-bagged order procedure which will be accomplished at a designated location.
- B. The Superintendent will determine the maximum allowable weekly canteen expenditures per incarcerated individual or civil commitment. This expenditure ceiling will be assimilated into a canteen procedure and documented in each applicable institutional policy and submitted annually.
- C. The SDS delivery schedule will be determined by mutual agreement between the contractor and the respective Superintendent.
- D. The day-to-day operations of the SDS will be accomplished in accordance with the language of the Request-for-Response (RFR) and corresponding contractual agreement.

#### **<u>476.04</u> <u>CANTEEN ITEMS</u>**

- A. All institutions shall maintain a list of Canteen Items available for purchase. The Canteen items shall be selected from the Department's master list as documented in the contractual agreement. The items on the Department's master list may be updated during the course of the contract with Department approval. Any additions to the Department master list shall be approved by the Commissioner or their designee. The determination of allowable Canteen Items for general population will be at the discretion of the Superintendent or their designee, who may establish such mechanisms to determine incarcerated individual and civil commitment preferences in choosing said products. Items may be discontinued to accommodate new products if so desired.
- B. The determination of allowable Canteen Items for any canteen list(s) other than those for the general population, and any changes to these lists, require the approval of the respective Assistant Deputy Commissioner (ADC) of the Northern or Southern sector.
- C. Canteen Items shall be priced in accordance with the RFR and contractual agreement. Any price increase or decrease shall be approved by the Commissioner or their designee. Price lists shall be posted in a visible location or shall be assimilated into the order form.

#### 476.05 SECURE DELIVERY SYSTEM PROCEDURES

- A. The debiting of each incarcerated individual or civil commitment account for canteen sales will be coordinated with the Executive Office of Technology Services and Security (EOTSS).
- Β. The truck carrying canteen orders will be locked by the vendor's manager or team coordinator and sealed with a tamper proof seal at the vendor's warehouse once the loading of the canteen orders has been completed. The seal number will be written on the attached form and placed on a clip board at the rear of the truck. The officer operating the security gate at the institution receiving the canteen orders will examine the seal to make sure it has not been cut or tampered with in any way. If intact, the officer will cut the seal and match the seal number with the number noted on the form. If the number on the seal matches the number noted on the form, the officer will sign off acknowledging that the seal number and number noted on the form match and the canteen delivery will proceed. If the seal number does not match the form, or if the seal has been broken or tampered with, the truck will not be allowed in. The officer will immediately contact the Shift Commander and document an incident report in IMS and an investigation will be conducted.

- C. Canteen orders are packaged in clear, heat-sealed plastic bags. Incarcerated individuals or civil commitments must verify the contents of same order before signing receipt and opening the bag. Incarcerated individuals and civil commitments will not be afforded credit for missing items once the bag has been opened.
- D. The contractor shall notify the institution of any credits for missing items or for canteen orders that were not delivered. The institution receiving funds shall be responsible for crediting the respective incarcerated individual's or civil commitment's account. The contractor may automate the credit process with the approval of the Department.
- E. All sales will be accrued to the designated account on the Department's Electronic Data Management System. Sales should be reconciled before any vendor payment is disbursed. Commissions shall be systematically transferred to the appropriate IICCBF Account and EBF Account for accounting purposes.
- F. Evidence of canteen expenditures should be retained and systematically filed for audit purposes.
- G. The retail sales of all tangible items at the canteen are subject to the Massachusetts sales tax. The contractor is responsible for the collection, reporting, and payment of sales tax pursuant to the contractual agreement.

#### 476.06 INCARCERATED INDIVIDUAL/CIVIL COMMITMENT BENEFIT FUND ACCOUNT REVENUE REPORTS AND ANNUAL AUDIT PLAN

- A. On a monthly basis, each institution shall complete an Incarcerated Individual/Civil Commitment Benefit Fund Account Revenue Report (IICCBF Account Revenue Report, Attachment #1) detailing commissions, collection, and expenditures from and to its Institutional IICCBF Account. Said report will be cumulative in form and submitted to the Department's Support Services Division by U.S. Mail, Department courier, or electronic mail no later than fifteen (15) days after the close of the previous period. These reports will be reviewed/audited for compliance with this policy. An annual report will be compiled by the Audit and Compliance Unit delineating the aforementioned financial transactions. An electronic version of the IICCBF Account Revenue Report (Attachment #1), with updated imbedded formulas, is available from the Support Services Division.
- B. The Audit and Compliance unit shall execute the annual audit plan for all Institutional IICCBF Accounts. One (1) component of the annual audit plan shall be to identify institutions that generate revenue in excess of historical

needs and institutions that fail to generate sufficient revenue to meet historical needs. Upon approval of the Executive Director of the Administrative Services Division, monies identified as excess shall be redistributed to institutions that are in need of additional IICCBF Account monies. Any remaining excess monies shall be transferred to a centralized Incarcerated Individual/Civil Commitment Benefit Fund Account (Central IICCBF Account). The Executive Director of the Administrative Services Division shall be responsible for the control and management of the Central IICCBF Account and shall have spending authority to \$10,000.00; any expenditure more than \$10,000.00 shall require Deputy Commissioner Administration approval.

#### 476.07 VENDING MACHINES

- A. All Department institutions or divisions which have vending machines located on their property shall do so only with an approved written charter. This charter shall state for whose benefit any profits accrue to as well as any other appropriate functions or policies deemed appropriate. This charter must be resubmitted to the Commissioner or their designee for approval whenever a material change occurs or if there is a change in the position of Superintendent.
- B. The procurement of vending machine services is centralized for the Department and will be accomplished by competitive solicitation in accordance with 103 DOC 340, *Department Purchasing Procedures*. The Executive Director of the Administrative Services Division will coordinate said procurement and execute the required contractual documentation.

#### 476.08 VERIFICATION OF VENDING REVENUES

It is the responsibility of the Superintendent or their designee to verify that all monies received agree with the terms of the contract.

#### 476.09 VENDING MACHINE ACCOUNT RECORDS

Associated commission statements, revenue receipts, etc. should be systematically filed and retained for audit purposes. Any profit splits between different groups should be so noted (e.g., fifty percent (50%) IICCBF Account, fifty percent (50%) EBF Account) on the source document.

#### 476.10DEPARTMENT PROGRAM ACCOUNT

A. To identify and utilize all available resources, a Department Program Account (DPA) has been established to supplement existing programs or funding for new programs throughout the Department.

- B. The DPA will generate its funding by a ten percent (10%) stipend of all gross profits from canteen sales and vending machines with the exception of those profits/commissions that are designated in accordance with an approved charter, such as those held in the EBF Account, which are exempt from this assessment. The amount of this stipend will be determined from the completion of the monthly IICCBF Account Revenue Report (Attachment #1) assessed from the computation of <u>gross</u> revenue as depicted. The transference of said monies will be accomplished as a disbursement payable to the DPA and forwarded to the Fiscal Liaison as designated by the Executive Director of the Administrative Services Division. Said transaction should be accomplished upon completion of the Fiscal Liaison by the 15<sup>th</sup> of the month following the reporting period.
- C. The Deputy Commissioner of Clinical Services and Reentry shall be responsible for the control and management of the DPA. All financial transactions will be in accordance with sound business practices and supporting documentation shall be appropriately filed and retained for audit purposes. Requests for funding for existing or new programs from the DPA shall be made in writing from the respective Superintendent to the Deputy Commissioner of Clinical Services and Reentry. All requests should be in letter form outlining the reason(s) for the request, justification, group(s) of incarcerated individuals or civil commitments affected, suggested vendor, and the amount of the proposed expenditure. All disbursements from the DPA will be accomplished in a centralized manner pursuant to the acquisition of appropriate receiving evidence from the institutional recipient. All goods and services procured using funds from the DPA are subject to the provisions of 103 DOC 343, Fixed Assets Inventory and Control and 103 DOC 340, Department Purchasing Procedures.
- D. The Executive Director of the Administrative Services Division shall designate the Fiscal Liaison who shall be responsible for the fiscal bookkeeping functions of the DPA.

#### 476.11 LAW LIBRARY ACCOUNT

A. The Law Library Account (LLA) will generate its funding by a twenty percent (20%) stipend of all gross profits from canteen sales and vending machines except for those profits/commissions that are designated in accordance with an approved charter as funds for the EBF Account, which are exempt from this assessment. The amount of this stipend will be determined from the completion of the monthly IICCBF Account Revenue Report assessed from the computation of gross revenue as depicted. The transference of said funds will be accomplished as a disbursement payable to the LLA and forwarded to the Department Liaison as designated by the Executive Director of the Administrative Services Division. Said

transaction should be accomplished upon completion of the IICCBF Account Revenue Report. Payment should be submitted to the Department Liaison by the 15<sup>th</sup> of the month following the reporting period.

- B. The Department's Education Division shall be responsible for the control and management of the LLA. All financial transactions will be accomplished in accordance with sound business practices with supporting documentation appropriately filed and retained for audit purposes.
- C. The Executive Director of the Administrative Services Division shall designate the Department Liaison who shall be responsible for the fiscal bookkeeping functions of the LLA.

# 476.12INSTITUTIONAL GUIDELINES FOR EXPENDITURE OF MONIES<br/>FROM INCARCERATED INDIVIDUAL/CIVIL COMMITMENT<br/>BENEFIT FUND ACCOUNTS

- A. Superintendents shall retain seventy percent (70%) of profits generated from the SDS vending machine commissions, and other sources of incarcerated individual or civil commitment benefit revenue and place them in the Institutional IICCBF Account. The retained profits are subject to annual review in accordance with 103 DOC 476.06 of this policy.
- B. Expenditures of monies from the Institutional IICCBF Account shall benefit the general incarcerated individual and civil commitment population or be for any goods or services determined by the Commissioner to be necessary to maintain and/or enhance the delivery of services to incarcerated individuals and civil commitments. Awarding monies to special incarcerated individual or civil commitment interest groups, clubs, and associations shall normally not be permitted unless justification can be substantiated by the Superintendent. IICCBF Account monies should not be used for the purchase of goods or services that the institution requires as part of its normal operations.
- C. All purchases shall be made in accordance with sound business practices pursuant to 103 DOC 340, *Department Purchasing Procedures*. All equipment purchased with monies from the IICCBF Account shall become the property of the Department and subject to the provisions of 103 DOC 343, *Fixed Assets Inventory and Control*.
- D. Institution staff shall utilize Attachment #2 to request expenditures from the IICCBF Account. The Institution Treasurer shall review all institution requests to ensure that monies are available. All such requests must be approved by the respective Superintendent or their designee in writing.
- E. IICCBF Account expenditures exceeding one thousand dollars (\$1,000.00),

including reoccurring expenditures that annually exceed the one thousand dollar (\$1,000.00) threshold require written authorization from the Deputy Commissioner of Administration or their designee. Superintendents shall submit Attachment #3 to request such approval. Reoccurring expenditures that exceed the threshold, e.g., library expenses, should be submitted in cumulative form for the entire fiscal year.

- F. Every effort must be made to ensure that all purchases obtained by using monies from IICCBF Account utilize state contracts whenever feasible. All such purchases requiring bid proposals require prior approval from the Executive Director of the Administrative Services Division. Said approval should be preceding any approval required for exceeding the one thousand dollar (\$1,000.00) expenditure threshold.
- G. All approved supporting documentation shall be collectively attached to expenditure documentation and retained for audit purposes.
- H. Any institution seeking to utilize IICCBF Account monies for any special event, regardless of amount, must complete Attachment #5 and submit the completed form to the Office of the Deputy Commissioner of Administration for approval. Note that Attachment #5 requires an itemized list of the goods and/or services to be purchased and their cost.

#### 476.13EMPLOYEE BENEFIT FUND ACCOUNTS

- A. An Institutional EBF Account may be maintained for the benefit of all staff. Expenses for such items as flowers, contributions to the Department Awards Banquet, employee recognition, and charitable donations shall be the primary use of these funds. Expenditures shall benefit all employees or be for any goods or services that all employees have an equal opportunity to benefit from.
- B. The source of revenue for Institutional EBF Accounts shall be limited to commissions derived from vending contracts as depicted in the institution or division "Vending Machine Charter" and donations. Any institution seeking to raise monies for the EBF Account by any other means, including raffles or sales of item(s), must complete Attachment #5 and submit the completed form to the Office of the Deputy Commissioner of Administration for approval. Note that Attachment #5 requires an itemized list of the goods and/or services to be purchased and their cost. Institutions may utilize a separate EBF Wellness Account to deposit monies raised by staff for staff use. EBF Wellness Accounts are subject to the same rules and restrictions as any other EBF account.

# 476.14INSTITUTIONAL GUIDELINES FOR EXPENDITURE OF MONIES<br/>FROM EMPLOYEE BENEFIT FUND ACCOUNTS

- A. The Superintendent is the authorized approving authority for expenditures from the EBF Account or EBF Wellness Account of one thousand dollars (\$1,000.00) or less.
- B. Expenditures from the EBF Account or EBF Wellness Account exceeding one thousand dollars (\$1,000.00) shall require the approval of the Deputy Commissioner of Administration. Superintendents shall utilize Attachment #4 to request such approval. All approved requests shall be maintained on file at the institution for audit purposes.
- C. All purchases shall be made in accordance with 103 DOC 340, *Department Purchasing Procedures* and in accordance with sound and ethical business practices. No expenditure shall directly or indirectly benefit the Superintendent. No purchase should be made from the EBF Account or EBF Wellness Account that would not be made from allocated appropriations. For example, purchases of such items as alcoholic beverages or holiday cards shall not be allowed. Receipts for all expenditures shall be obtained and kept on file.
- D. All equipment purchased with monies from the EBF Account or EBF Wellness Account will become the property of the Department and is subject to the provisions of 103 DOC 343, *Fixed Assets Inventory and Control.*
- E. The Executive Director of the Administrative Services Division shall conduct a periodic review of all expenditures from all the EBF Accounts. To facilitate this review, the following information shall be entered in the Department's Electronic Data Management System, while executing the expenditure transaction, who was paid, the amount of the payment, and a description of the item(s) or service(s) paid for.
- F. Any institution seeking to utilize EBF Account monies or EBF Wellness Account monies for any special event, regardless of amount, must complete Attachment #5 and submit the completed form to the Office of the Deputy Commissioner of Administration for approval. Note that Attachment #5 requires an itemized list of the goods and/or services to be purchased and their cost.

#### 476.15 ACCOUNTING PERIOD

The fiscal year for canteen and vending machine operations as contained herein will begin July 1<sup>st</sup> and end on June 30<sup>th</sup>.

#### 476.16 <u>RETENTION OF ACCOUNT RECORDS/SOURCE DOCUMENTS</u>

The Department's and institution's copies of all fiscal documents must be systematically filed to facilitate later retrieval for audit purposes.

#### 476.17ACCESS TO RECORDS

The Executive Director of the Administrative Services Division or their designee shall have access to all institutions and their fiscal records for audit purposes and/or to determine compliance with this policy.

#### 476.18 **RESPONSIBLE STAFF**

The Executive Director of the Administrative Services Division, under the supervision of the Deputy Commissioner of Administration, shall be responsible for implementation and monitoring of this policy throughout the Department.

Each Superintendent shall be responsible for the implementation of this policy and for the development of any and all necessary and appropriate institutional procedures.

#### <u>476.19</u> <u>EMERGENCIES</u>

Whenever in the opinion of the Commissioner or their designee an emergency exists which requires suspension of 103 DOC 476, they may order such suspension.

Attachment	#1
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Incarcerated Individual/Civil Commitment Benefit Fund Account Revenue Report			
Institution		Month/Year	June
Revenue		Current Month	Fiscal Year to Date
	SDS Commissions	\$0.00	\$0.00
	Vending Commissions	\$0.00	\$0.00
	Lockers	\$0.00	\$0.00
	Interest	\$0.00	\$0.00
	Other:	\$0.00	\$0.00
	Total Revenue	\$0.00	\$0.00
	(Add) Supplemental Income	\$0.00	\$0.00
	Total Available Funds:	\$0.00	\$0.00
Expenditures			
-	10% Program Assessment	\$0.00	\$0.00
	20% Law Library Assessment	\$0.00	\$0.00
	General Library	\$0.00	\$0.00
	Law Library: Books	\$0.00	\$0.00
	Law Library: Other	\$0.00	\$0.00
	Incarcerated Individual/Civil		
	Commitment Property Shipped	\$0.00	\$0.00
	Operating Expenses	\$0.00	\$0.00
	General Incarcerated Individual/Civil	<b>\$0.00</b>	<b>\$2.00</b>
	Commitment Benefit Exp.	\$0.00	\$0.00
	Religious	\$0.00	\$0.00
	Recreation	\$0.00	\$0.00
	STP Expenditures	\$0.00	\$0.00
	Program Expenses	\$0.00	\$0.00
	Voids\Refunds\Res	\$0.00	\$0.00
	<u>Total Expenditures</u>	\$0.00	\$0.00
	Net Revenue/Loss	\$0.00	\$0.00
		40.00	÷0.00

### INSTITUTION EXPENDITURE REQUEST FORM

TO:	Treasurer/Superintendent			
FROM:				
DATE:				
Amount Requ	ested:			
Reason for Re	equest:			
Incarcerated In	ndividual or Civil Commitmer	nt Group/Activ	vity Requesting	Funds:
who will bene	efit from purchase?			
Incarcerated Individual or Civil Commitment Contact Person:				
Housing Area	Housing Area:			
Purchase From	n:			
City, State, Zi	p Code:			
Staff Action Only				
Recommendat	tion/Program Director:	Approved:		Denied:
Treasurer - Is	money available:	Yes:		No:
Superintenden	it's Action:	Approved:		Denied:

	DEPUTY COMMISSIONER OF ADMINISTRATION Excess Expense Request Form Incarcerated Individual/Civil Commitment Benefit Fund Account
TO:	Deputy Commissioner, Administration
FROM:	Superintendent
DATE:	
RE:	Request to Expend in Excess of \$1,000.00 from Incarcerated Individual/Civil Commitment Benefit Fund Account (IICCBF)
(Institution	is requesting to expend for the purpose of: Name) (Amount Requested)
individual/ci I hereby ce Please see	(i.e., purchasing 35 Burgundy Modu-Max Stacking Chairs with arms to be used for incarcerated vil commitment programs, Chapel, recreation videos, etc.). Trify that sufficient funds are available in this institution's IICCBF for this expenditure. attached purchase requisition for further information.
Deputy Co	mmissioner's Action: Approved/Date Denied/Date
Please Ret	urn to (Name/Address):

	Exce	<b>IISSIONER OF ADMINISTRATI ss Expense Request Form oyee Benefit Fund Account</b>	ON	
TO:	Deputy Commissioner	, Administration		
FROM:		, Superintendent		
DATE:				
RE:	Request to Expend in H Account (EBF)	Excess of \$1,000 from Institution's E	Employee Benefit Fund	
is requesting to expend for the purpose of: (Institution Name) (Amount Requested)				
(Description) (	(i.e., purchasing 35 Burgundy )	Modu-Max Stacking Chairs with arms to be	used for staff dining.)	
•	•	are available in this institution's EB on for further information.	BF for this expenditure.	
Superintende	ent's Signature:			
Deputy Com	missioner's Action:		_Approved/Date	
			_Denied/Date	
Please Retur	n to (Name/Address):			

#### Department of Correction Special Event Request Form

Institution:	Requestor:
Name of Event:	
Date of Event:	
Description and Purpose of Event:	
All Inclusive Itemized cost of Event: (Attach Itemi	zed List and Cost) Funding Source:
Food/Menu items:	
Food Supplies:	
Administrative Expenses:	
Trinkets/Gifts:	
Other:	
** Total Cost to Be Funded:	
	state-wide or Department-contracted vendors. If a contract does not ultiple quotes must be obtained and retained for audit purposes.
Superintendent's Signature:	
Deputy Commissioner's Signature:	Date:
	al Event Payment Approval
· ·	
-	er \$1000 MUST include a completed and signed Excess Expense Deputy Commissioner of Administration.**

#### Please submit all required payment documentation for each event to the Executive Director of the Administrative Services Division for payment processing approval.

#### PUBLIC