

Confirming Orders (After-the-Fact) Guidance

Introduction

A **Confirming Order** (also referred to as an **After-the-Fact (ATF)** purchase) occurs when a department commits the University to buy goods and/or services before the required authorization has been issued (e.g., Purchase Order, executed contract, approved change order), or when a requisition is created only to document or pay for something that has already been ordered, delivered, performed, or invoiced. Confirming Orders are **not permitted** under University policy. In the absence of a signed contract executed by an authorized University signatory, or an allowable P-Card or Supplier Invoice transaction in accordance with policy, the **Purchase Order (PO)** is the document that authorizes a supplier to proceed. To comply with policy, all requisitions must be submitted to Procurement Services and converted to Purchase Orders prior to the supplier starting any work or providing any goods or services. Individual faculty/staff are not authorized to procure independently.

Why are Confirming Orders / After-the-Fact not allowed

Confirming Orders (ATF) create significant risk and may result in:

- Noncompliance with University policy and applicable State laws, regulations, and procedures
- Missing statutorily required documentation or approvals
- University Terms & Conditions are not incorporated into the purchase
- Commitments made without an approved budget
- Duplicate orders, invoice matching issues, delayed payment, or disputes
- Increased risk related to contract terms, liability, insurance, and indemnification

What counts as a Confirming Order (After-the-Fact)

A Confirming Order purchase occurs when a department commits the University to buy goods and/or services before the required authorization has been issued, or when a requisition is created solely to document or pay for something that has already been ordered, delivered, performed, or invoiced without the required authorization.

Examples of confirming orders:

- A department approves a consultant by email, the work is completed, and the requisition is submitted afterward for payment. This is a Confirming Order because the supplier was told to proceed before the PO or contract was in place.
- A department orders goods (for example, tires) by phone or online and submits the requisition only after the order has been placed and the supplier invoice is received. This is a Confirming Order because the University was committed to the purchase prior to the PO being issued.

For purposes of determining Confirming Order status:

- Authorization occurs when the PO is in “Issued” status in Workday, and/or when a contract is fully executed by the appropriate signatories through the defined process when a contract is required.
- A purchase is not a confirming order if an executed contract clearly covers it, an active pre-approved Blanket PO exists within scope, or if in compliance with an allowable Supplier Invoice (Direct Pay) category or P-Card purchase.
- Supply Invoice (Direct Pay) may not be used to bypass PO requirements when a supplier is providing goods/services that should be under a PO or contract.
- The invoice date alone may flag a transaction for review, but the invoice date does not determine After-the-Fact status on its own.
- Exceptions are limited to documented emergencies in accordance with the emergency policy, or other narrowly approved exceptions as authorized by Procurement Services, limited to documented system outages or critical continuity scenarios.

Effective dates and phased rollout

To support culture change and adoption, the University will implement these changes in phases:

- **Phase 1 – Tracking Only: July 1, 2026 through December 31, 2026:** Procurement will focus on education, coaching, and supporting the adoption of the updated processes while tracking Confirming Orders consistently.
- **Phase 2 – Enforcement: Beginning January 1, 2027:** Procurement will implement a phased escalation process for repeat violations, including warning/coaching, written justification, and Officer/Dean approval for repeated Confirming Order activity.

Escalation and correction process

Confirming Orders (After-the-Fact) will be tracked by **Cost Center**, including the responsible party/initiator when identifiable (the individual who directed the supplier to proceed), not the individual who performed clerical entry of the requisition. Occurrences will be counted per

commitment event/engagement; multiple invoices for the same engagement will be treated as a single occurrence. Tracking resets every fiscal year (or as otherwise determined).

- First Occurrence – Warning / Coaching
 - Procurement sends a warning email and tracks the violation.
- Second Occurrence – Justification to Procurement
 - Procurement requires written justification that includes:
 - Overview of the goods/services
 - Reason the expenditure was made outside allowable methods
 - Timing of when the commitment was made, how it was communicated to the supplier, and the initiator of the violation
- Third and Subsequent Occurrences – Officer/Dean Approval Required
 - To resolve a Confirming Order and proceed with payment, the end-user must submit written approval from the Officer or Dean of the area. Requests must include:
 - Overview of the goods/services
 - Reason the expenditure was made outside allowable methods
 - Timing of when the commitment was made, how it was communicated to the supplier, and the initiator of the violation
 - Repeat Confirming Order activity may result in escalated approvals, mandatory refresher training, and/or purchasing access restrictions for the initiator.

Processing requirements

Once proper justification is received, the email authorization must be attached to the requisition in Workday for approval, or if the requisition is with Procurement Services, the email authorization must be provided to the Procurement Services Buyer to attach before processing.

To Avoid Confirming Orders:

- Submit requisitions to Procurement Services **before** the supplier begins work or provides goods/services.
- Attach the quote, proposal, agreement, or other supporting documentation to the requisition.
- Use **Workday Strategic Sourcing (WSS)** for contracts, sourcing events, delegated waiver/BOT requests, and procurement contract requests as required.
- Use a **Blanket PO** where appropriate for recurring, routine, or usage-based purchases.
- Review the **updated Supplier Invoice (Direct Pay)** category list to ensure the purchase remains eligible for Supplier Invoice processing where applicable.