PCard Manual

Procurement, Contracting & Payment Services

West Virginia University &

West Virginia University Research Corp

Adoption Date: 11/1/17

Revision Dates: 2/1/18, 6/22/18, 4/1/19, 2/1/20, 5/1/21, 7/1/21, 9/1/21, 11/1/21, 1/1/22, 9/1/23, 11/1/23, 1/15/25

Most Recent Revision: 7/1/26

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SECTION I: INTRODUCTION

This Manual contains the procedures applicable to the procurement card program for West Virginia University (WVU) and West Virginia University Research Corporation (WVURC), hereinafter referred to as the University "PCard Program."

The State of West Virginia PCard Program was created and implemented in 1996 by West Virginia Code, §12-3-10a, and is governed by Legislative Rule, 155 CSR 7. The State Auditor's Office, PCard Division serves as the Program Administrator for the State PCard Program.

The State Auditor's Office Purchasing Card Policies and Procedures Manual establishes the minimum standard for the use of the State of West Virginia PCard and the WVU PCard Program fully complies with those standards.

WVURC's PCard Program is not covered by the statutory authorities above. The Treasurer of WVURC serves as the Program Administrator.

The PCard may be used to make payment for goods and designated services as permitted by PCard and Procurement Policies & Procedures.

The PCard Program Manual is promulgated by the WVU PCard Policy, which can be found at: http://financediv.wvu.edu/policies.

It is the policy of the University/Research Corporation that all Deans, Directors, Designees, Strategic Business Advisors, Financial Management staff of the Shared Services Center, Financial Transaction Approvers, supervisors/grant approver, and cardholders must be knowledgeable of and follow all PCard Policies & Procedures and applicable Procurement Policies & Procedures. For procurement questions, Procurement, Contracting & Payment Services (PCPS) may be contacted at pcps@mail.wvu.edu.

Employees who become aware of an instance of unlawful use, possible fraud, misappropriation, or mismanagement with the PCard should report such discovery to PCPS PCard Administration immediately. The WVU Ethics Line is also available at: https://secure.ethicspoint.com/domain/media/en/gui/14303/index.html.

SECTION II: PROPER OVERSIGHT

Roles and Responsibilities

A community of people within the University share financial stewardship of the University's PCard program, even though they play different roles. Listed below are the primary roles of the program. Keep in mind that these are roles, not job descriptions, so an individual may function in more than one of these capacities.

- Agency PCard Coordinator
- PCPS PCard Administration
- Deans, Directors, or Designee
- Supervisor/Grant approver

- Strategic Business Advisor
- Director of Financial Management – Shared Services Center
- Financial Transaction Approvers
- Cardholder

Agency PCard Coordinator

WVU's Chief Financial Officer or their designee shall serve as WVU's Agency PCard Coordinator. WVU Research Corporation's Treasurer or their designee shall serve as the WVURC's Agency PCard Coordinator.

The Agency PCard Coordinator's role is to provide leadership and oversight for the University's PCard Program, establish the policies and procedures which govern the Program, ensure the effectiveness of the Program in meeting established objectives, and seek improvements in operational processes.

Areas of responsibility include, but are not limited to the following:

- Review the compliance of the Program with established University policies, procedures, and the requirements set forth herein.
- Report any serious instances of misuse, abuse, or fraud on a WVU PCard to the State Auditor's Office, PCard Division. Report any serious instances of misuse, abuse, or fraud on a WVURC PCard to WVURC's Treasurer. Internal Audit and the WVU Police Department should also be notified as deemed appropriate.
- Require any employee who becomes aware of an instance of unlawful use, possible fraud, misappropriation, or mismanagement with the PCard to report such discovery immediately.
- Approve internal control plans for all WVU/WVURC College/Divisions.

PCPS PCard Administration

The University's Procurement, Contracting and Payment Services Department (PCPS) is responsible for the administration of all University PCard Programs.

Areas of responsibility include, but are not limited to the following:

- Administer cardholder enrollment, modifications, suspension, or cancelation.
- Provide relevant PCard training to approvers and cardholders.
- Assist approvers and cardholders in the resolution of disputes, unauthorized use claims, and/or lost or stolen PCards.
- Assess requests for exemptions to the current University PCard Program policies and procedures.
- Coordinate the PCard monthly payment to the bank provider.
- Develop a system for monitoring PCard activity for compliance and conduct periodic reviews of PCard activity to ensure compliance. Determine instances of violations of the PCard policies and procedures and apply the appropriate disciplinary action.
- Coordinate the secure delivery of PCards to the cardholders.

Deans, Directors, or Designees

The Dean, Director, or designee of each College/Division is responsible for ensuring that all employees with PCard responsibilities within their respective area comply with the established internal controls and relevant policies and procedures. The Dean, Director or Designees must be knowledgeable of all WVU PCard and Procurement policies and procedures.

Supervisor/Grant Approver

The supervisor/grant approver is responsible for reviewing each expense report to ensure the expenses are allowable, allocable, and reasonable to the funding account/award. The supervisor/grant approver must approve all applicable transactions in MyExpenses. Any instances of cardholder misuse, abuse, or fraud must be reported to PCPS PCard Administration.

Supervisors are also responsible for approving PCard applications for their employees, as well as ensuring that PCards are collected, cancelled, and destroyed upon termination or separation from employment.

Strategic Business Advisor

The Strategic Business Advisor(s) of each WVU/WVURC College/Division is responsible for the oversight of the PCard program within their area of control. This includes, but is not limited to the following:

- Disseminate updated PCard policies, procedures, or other general information to all cardholders within the College/Division.
- Report any instance of misuse, abuse, or fraud to PCPS PCard Administration.
- Review and approve all PCard applications for the College/Division prior to submission to PCPS PCard Administration. Verify the applicant's employee status and ensure the PCard limits are reasonable based on the applicant's duties and responsibilities.
- Ensure any Financial Transaction Approvers for their College/Division follow the policies and procedures.

Financial Management Director – Shared Services Center

The Financial Management Director in the Shared Services Center is responsible for oversight of the Financial Transaction Approvers. **If a College/Division is not included within the scope of the Shared Services Center, the responsibilities listed below will be assigned to the Strategic Business Advisor.**

Areas of responsibility include, but are not limited to the following:

- Establish the internal PCard management and controls procedures within the applicable group of Financial Transaction Approvers and submit to PCPS PCard Administration for approval. Address any additional controls as recommended by PCPS PCard Administration or auditors. Monitor and oversee the applicable group of Financial Transaction Approvers to ensure that internal controls/segregation of duties are in place to prevent misuse.

- Disseminate updated PCard policies, procedures, or other general information to all Financial Transaction Approvers.
- Report any instance of misuse, abuse, or fraud to PCPS PCard Administration.
- Assign an adequate number of Financial Transaction Approvers to support the timely and effective workflow processes relevant to PCard activity.
- Ensure any Financial Transaction Approvers for their College/Division follow the policies and procedures.

Financial Transaction Approver

The Financial Transaction Approver's role is to ensure the integrity and accuracy of all PCard transactions within their assigned area of responsibility. The Financial Transaction Approver must be knowledgeable of all PCard and Procurement policies and procedures, as well as the applicable internal control procedures.

Areas of responsibility include, but are not limited to the following:

- Review transaction receipts and all required source documents as they are submitted in MyExpenses to ensure that each transaction is following applicable policies and procedures, a correct accounting string was used, funds are available in the account being charged, and the appropriate supporting documentation is attached.
- Notify PCPS PCard Administration of any misuse, abuse, or fraud detected during their review of transactions, as well as any habitual non-compliers of the PCard policies and procedures.
- Complete training before granted access as a Financial Transaction Approver and then annually thereafter.

Cardholder

The cardholder is responsible for any transaction charged to their PCard. Cardholders must be knowledgeable of all PCard and Procurement policies and procedures, as well as any relevant policies and procedures of any regulatory agencies from which they are making grant funded transactions.

Cardholders are responsible for the timely and accurate submission of expense reports in MyExpenses. By submitting/approving an expense report, the employee is certifying that all expenses included in the report were for legitimate business purposes, are accurate, and have not been previously reimbursed or paid from any other source. If another employee submits a report on the employee's behalf (acting as their delegate), the employee must review the report and ensure its accuracy prior to approval.

Additional areas of responsibility include, but are not limited to the following:

- Ensure proper completion and submission of applications, cardholder agreements, and maintenance requests.
- Complete training before a PCard can be issued and biennially thereafter.

- Report any misuse, abuse, or fraud to their Strategic Business Advisor.
- Contact the vendor to resolve disputes and complete the required dispute process.
- Contact the bank for unauthorized transactions on their PCard and complete the required unauthorized use affidavit.
- Ensure security of their PCard and card information.

SECTION III: HOW TO OBTAIN A PCARD

Who Can Request?

Except upon approval by PCPS PCard Administration, a cardholder must be an employee of West Virginia University or the WVU Research Corporation. This approval will occur via the PCard Application form in Mountaineer Marketplace. By being approved for and agreeing to use a WVU or WVURC PCard as a WVU Health System employee or WVU student granted approval to have a WVU or WVURC PCard, that individual agrees to follow and is bound by following all PCard policies, the WV Ethics Act, and WVU Board of Governor's Rule 1.4.

Before an employee's application for a PCard will be accepted, the employee must have successfully completed the following:

- Cardholder Training and Quiz
- Cardholder Agreement

Training

All cardholders are required to receive training prior to having access to a PCard. The training requirements are listed below:

Table 1: Training	
Program	**Training Requirements**
WVU/WVURC	2 training sessions (Policies/Procedures and WV Ethics Act)

*If a cardholder has both a WVU and WVURC PCard, they must only take the training once.

All Financial Transaction Approvers must complete the required Financial Transaction Approver training prior to having access as an approver in MyExpenses. Financial Transaction Approvers who are also cardholders only need to complete the required Financial Transaction Approver training. This includes both WVU and WVURC approvers.

Note: Cardholders are required to take refresher training and complete the Cardholder Agreement biennially. Financial Transaction Approvers must take refresher training annually.

Cardholder Agreements

Upon completion of training, cardholders must complete a Cardholder Agreement. This agreement signifies that the applicant acknowledges that he or she has had adequate training, understands the PCard policies and procedures, and accepts responsibility for compliance.

Application Process

An application must be completed in Mountaineer Marketplace before a card can be issued. This application includes the cycle/monthly and single transaction limits, which are set based on the cardholder's job responsibilities. The cycle/monthly limit is the maximum amount of credit assigned to an individual PCard (the maximum dollar amount that can be accumulated during one single cycle/month). The transaction limit is the maximum dollar amount available to a cardholder for a single transaction.

The following limits in Table 2 require written justification and are subject to approval by PCPS PCard Administration:

Table 2: PCard Credit Limits

Limit	Dollar Threshold
Cycle / Monthly	> $25,000
Single Transaction	> $10,000

PCPS PCard Administration shall conduct a utilization study of the University's PCard credit limits on at least a biennial basis to determine if each PCard requires its current limit. If a PCard has been used, but clearly does not require its current limits, PCPS PCard Administration will work with the Strategic Business Advisor to determine a new, more appropriate limit.

Card Activation

After the application has been processed, the PCard will be mailed to PCPS PCard Administration and will be ready for the pick-up. Cardholders must sign the back of the PCard upon receipt. The cardholder is responsible for activation. Instructions for activation will be included with the new card.

Keeping the PCard Secure

The PCard must be kept in a secure location that only the cardholder has access to, with physical controls present to ensure the security of both the PCard and the PCard records. In addition, only the last four (4) to six (6) digits of the card number should be included on any documentation or email.

Card Delegation
Card delegation is the practice of allowing an individual other than the cardholder to have:

A. Physical possession of the PCard to make payments to point of sale vendors;
B. Access to the card number and expiration date to make payments via telephone, internet, or in person; or
C. Access to receipts or invoices that display the card number and expiration date.

Card delegation is strictly prohibited for both WVU and WVURC PCards. WVU/WVURC Strategic Business Advisors and Financial Transaction Approvers are responsible for ensuring card delegation does not take place within their area and must notify PCPS PCard Administration of any instances of card delegation.

SECTION IV: HOW TO USE A PCARD

Official Business Only

The PCard is for official University business only; personal charges are strictly prohibited. The PCard may be used for the payment of goods and services that are not prohibited for payment by PCard or Procurement policies. All current Procurement policies must be followed, regardless of the method of payment. Any questions concerning procurement rules, policies, or procedures should be referred to Procurement, Contracting and Payment Services at pcps@mail.wvu.edu.

All purchases (goods, travel, hospitality, etc.) must comply with the current Spending Guidelines issued by the Chief Financial Officer.

All purchases made on University PCards must comply with WVU's Board of Governor's Rule 1.4 and the WV Ethics Act. You can view the Ethics Act at: **http://www.ethics.wv.gov**

Ordering Using the PCard

The PCard should only be used to place orders via in person, phone, mail, fax, or secured internet site. If using 3rd party check out processors (i.e., PayPal), cardholders must ensure that the transaction is an allowable purchase and complies with all PCard and Procurement policies and procedures.

Shipping and handling charges must be included in the stated price, and the total charge may not exceed the cardholder's assigned transaction limit. When placing the order, the vendor should be instructed to provide an itemized invoice or receipt. The vendor may not charge the account until the merchandise has been shipped.

A "secured site" has a closed "lock" at the bottom of the screen.

Online accounts: Cardholders may utilize online accounts or web portals to order merchandise for valid business purposes; however, cardholders must establish separate business accounts with online merchants -i.e., separate from their own personal account.

- Cardholders may not use personal accounts with online merchants or retailers for business purposes without prior written approval by PCPS PCard Administration (see Table 4).
- Cardholders may not save WVU or WVU Research Corporation PCard information as a saved payment method within personal accounts.
- Examples of these accounts include, but are not limited to: Sams, Walmart, eBay, PayPal, etc.
- All Amazon orders must be placed through the University's Amazon business account. Purchases made with Amazon outside of the approved business account link will be considered unallowable.

Fees: Certain vendors may charge a fee for paying via the PCard.

- A convenience fee is a charge levied for the privilege of paying for a product/service using an alternative payment method. This fee should be a flat or fixed amount. An example would be that the vendor adds a flat rate fee to accept payment via PCard online because their normal payment method is face to face card swipe.
- A payment card surcharge, also known as a checkout fee, is an additional fee that a merchant adds to a consumer's bill when a PCard is used for payment. This fee can be a flat rate or percentage fee, but the percentage fee must not exceed 4%. Cardholders should contact PCPS PCard Administration before initiating a transaction with a fee exceeding 4%.

Tax Exempt Status: WVU and the WVU Research Corporation are tax exempt and should not pay sales tax to in-state vendors. Cardholders should remind vendors of the tax-exempt status <u>before</u> initiating a transaction. The words "Tax Exempt" and the WVU's tax identification number are printed on the WVU PCard. The cardholder may be required to provide the vendor with a copy of the WVU or WVURC tax-exempt certificate upon request. Tax-exempt certificates can be found at: http://taxservices.wvu.edu/home.

Note: The bank will not process disputes concerning tax. If a cardholder is charged with tax for an in-state vendor, they must contact the vendor to request a credit for the tax charged. If the vendor will not remove the tax, proof should be kept with the transaction documentation (i.e., email).

Unallowable Purchases

There are specific items that cannot be purchased using the PCard unless a waiver is granted by PCPS PCard Administration prior to the purchase. They include but are not limited to the purchases listed in Table 3.

Table 3: Unallowable Purchases	
Item	**Includes/Additional Information**
Alcohol	An exception may be granted by the WVURC Treasurer for designated individuals and/or events funded by WVURC.
Amazon purchases made outside of the University's specific business account	Amazon purchases must be made using the University's business account, using the link provided by PCPS PCard Administration.
Animals	Live animals.
Cash	Cash advances or cash credits without prior approval from PCPS PCard Administration.
Donations	The PCard can only be used for purchases/payments where the University is receiving an item in return for the cost. Donations to a supplier or organization are not allowable. Sponsorships are permitted as long as the University is receiving something in return (i.e., promotional poster, booth, program advertisement).
Fuel for personal vehicles	Fuel for personal vehicles is included in the calculation of mileage reimbursement. The PCard cannot be used to purchase fuel for a personal vehicle, even if the vehicle was used for business purposes.
Meals & personal expenses while on business travel	Room service, in-room movie expenses, and/or personal calls. See the WVU Travel Guidelines for travel information: https://procurement.wvu.edu/employees/traveling Does not include approved guardian travel meals.
Personal items/gifts	The use of the PCard for non-business-related items is considered misuse/abuse/fraud. This includes purchases of items deemed "personal" by the WV Ethics Act (i.e., flowers/cards for employees).
Purchases marked as Marketplace only on the Purchasing and Payment Guidelines	Includes, but is not limited to, computer supplies, furniture, office supplies, payments to other WVU departments, professional services, and most utilities. See the guidelines for specific details, including when approval for $10,000 or greater is required.
Purchases in violation of procurement policies and procedures.	(i.e., purchases that exceed the bid threshold). See the WVU/WVURC Purchasing manuals for more information: https://procurement.wvu.edu/rules
Purchase Order payments	Any good/service bought by Purchase Order. Invoices for items purchased through PO's must be processed through Mountaineer Marketplace.

Purchases that Require Additional Approvals

Certain purchases are permitted on the PCard, but require additional approvals and additional documentation, including the items in Table 4.

Table 4: Purchases Requiring Additional Approvals

Purchase	Obtain Pre-Approval From	Notes
Agreements/Contracts	• PCPS	Purchases that require execution of an agreement.
Drones	• ITS	Certain manufacturers are restricted based on American Security Drone Act. All Drones/Unmanned Aircrafts ("UAC") must have prior ITS Purchase Request approval before purchasing.
Furniture	• PCPS	Furniture requires prior approval from PCPS if not purchased through Mountaineer Marketplace. Purchases must also meet the WVU's fire code. Please reach out to Environmental Health and Safety with questions.
Gift Cards or other cash products	• PCPS PCard Administration	If grant-funded, all applicable rules & regulations must be followed. For instructions on requesting approval, please visit: **https://procurement.wvu.edu/employees/pcard**
Purchases/Payments $10,000 or greater	• PCPS PCard Administration (or Procurement)	Except for association dues, hospitality expenses, library subscriptions, shipping (UPS, FedEx, UPS), travel expenses, and utilities for cable, internet, and telecom.
Software, hardware, services, consulting, cloud hosting, etc.	• ITS	Approval can be obtained online at: https://procurement.wvu.edu/employees/purchases/goodsorservices/technologypurchases
Streaming services (e.g., Hulu, Netflix, ESPN, Disney Plus, Spotify, Pandora)	• PCPS PCard Administration	Email pcardadministration@mail.wvu.edu for approval prior to purchase.
Use of personal account for business purchases at an online merchant/retailer	• PCPS PCard Administration	Email pcardadministration@mail.wvu.edu for approval prior to purchase. Purchases using the WVU PCard must also be approved by the WV State Auditor's Office (PCPS PCard Administration will submit that request).

Weapons and ammunition	• PCPS PCard Administration	Approval from the University Police Department (UPD) is required. Email pcardadministration@mail.wvu.edu for approval prior to purchase, documenting UPD's approval. Include the intended use, how the items will be stored, who has access, and any controls that will be in place.

Gift Cards

The PCard may be used to purchase gift cards for business purposes (i.e., human subject payments, prizes, etc.). Gift cards cannot be given to employees for recognition, prizes, incentives, etc. Gift cards can only be given to students in specific situations due to their potential impact on the student's financial aid. **Approval must be obtained from PCPS PCard Administration before any gift card is purchased. Cardholders must submit a Gift Card Request Form in Mountaineer Marketplace for approval.**

The following internal controls and documentation must be maintained for gift card purchases:

- Cardholders must specify the intended group of recipients, specific dollar amounts, and type of card on their Gift Card Request Form.
- Cardholders should only purchase the amount of gift cards they will need within the next 30-day period, as to avoid purchasing too many cards and then having unused gift cards.
- Gift cards must be maintained in a secure location.
- Please review the Human Subject Payment Guidelines document for specific rules regarding the use of gift cards for human subject payments.
- A reconciliation log must be kept for all payments, including the name of the individual who received the gift card(s) and date the card was provided.
- PCPS PCard Administration will perform random post audits of the purchases each year to ensure compliance.
- PCPS PCard Administration and WVU Tax Services reserve the right to request the reconciliation log information, regardless of the dollar amount paid to the participant.
- Cardholders must report instances where a student received a gift card to Tax Services and Student Financial Services.

Business Travel Expenses Paid via PCard

The PCard is the preferred method of payment for business travel expenses except for meals, fuel for personal vehicle, and personal expenses (i.e., movies, room service, phone calls, etc.). Student guardian travel meals may be placed on the PCard (typically reserved for athletic, student, and academic team-related travel). All travel expenses paid on the PCard must comply with the WVU/WVURC Travel Policy and Manual.

Hospitality Expenses

Hospitality expenses include food, nonalcoholic beverages, and related expenses for the reception of guests by a Spending Unit for a specific event or function relating to conducting WVU Business. The PCard is the preferred method of payment for allowable hospitality expenses. All hospitality expenses must comply with the WVU/WVURC Hospitality Policy.

Fleet Card Expenses

Fleet Cards or ARI cards will be issued to pay for fuel and other fleet-related expenses for WVU/WVURC owned fleet vehicles. The type of card will be dependent on the type of vehicle and whether the vehicle is owned by WVU or WVURC. All fleet card activity must comply with the Guidelines for Paying for Fuel and Maintenance.

Employee Recognition Purchases

The West Virginia Ethics Commission provides specific guidelines for procurement items for employee recognition or retirement. Visit the West Virgina Ethic's Commission's page for guidelines.

Stringing

Stringing of payments is prohibited. Stringing is the intentional manipulation of the ordering, billing, or payment process to circumvent the transaction and/or bid limit. Stringing includes:

- Splitting an invoice exceeding the transaction and/or bid limit into more than one transaction.
- Colluding with a vendor to split an order into separate invoices.

Returns

Any returned goods must be credited to the PCard. Debit cards, gift cards or cash are not an acceptable method of receiving refunds for returned goods. Any deviation from this policy must be reported to PCPS PCard Administration. To return a good, please contact the vendor.

Disputing Charges

A disputed item is a transaction that results in a disagreement between the vendor and the cardholder about a charge. A disputed item may result from failure to receive goods, defective merchandise, incorrect amounts being charged, duplicate charges, or credits not yet received. The first step in the dispute process is for the cardholder to contact the vendor and attempt to resolve the problem. If the vendor is unwilling to resolve the issue, the dispute process will need to be completed within **60 calendar days** of the statement date that contains the disputed item.

For instructions on how to dispute a charge with the bank, please visit.

If you consistently have problems with a PCard vendor, please contact PCardAdministration@mail.wvu.edu.

Unauthorized Purchases

Transactions that appear fraudulent, meaning the cardholder did not place the order, should be reported to the bank immediately. While a disputed item is for a charge where the cardholder placed the order, but there is an issue with it, an unauthorized purchase is where a charge hits the PCard and the cardholder never placed that order. For instructions on this process, please visit:

Lost or Stolen Cards

To report a lost or stolen P-Card, call 1-800-344-5696 or 1-800-VISA911. To limit cardholder liability, cardholders must immediately report lost or stolen PCards to the bank and PCPS PCard Administration. A PCard Application & Changes form will need to be completed by the cardholder's department in order for the replacement card to be released. For instructions on this process, please visit:

SECTION V: HOW TO MAKE CHANGES TO A PCARD

Changes to the PCard

All requests for modifications to a cardholder's account, such as those listed below, must be submitted through the PCard Application & Changes form in Mountaineer Marketplace to make modifications to a cardholder's account.

- Cardholder Name.
- Cycle or transaction limit.
- Card cancellation (permanently closed with the bank).
- Bank hierarchy changes (i.e., department where cardholder resides).

Cancelling a PCard

All PCards must be cancelled immediately upon termination or separation from employment. The Supervisor is responsible for ensuring that the PCard is destroyed and that a PCard Application &Changes form is submitted in Mountaineer Marketplace.

SECTION VI: INTERNAL CONTROLS, TRANSACTION DOCUMENTATION & RECONCILIATION

Internal Controls and Segregation of Duties

Internal controls are the procedures put in place to provide reasonable assurance regarding the effectiveness and efficiency of operations, reliability of financial reporting, and compliance with applicable laws and regulations.

Each College/Division is required to design a sufficient internal controls structure to ensure compliance with PCard Policies and Procedures. Each College/Division is required to document their individual internal control procedures and to communicate those guidelines to its cardholders.

The WVU/WVURC PCard Internal Controls Document must be completed upon request and submitted to PCPS PCard Administration for approval. At a minimum, the College/Division must review its internal controls structure each year to ensure their accuracy and update them, as necessary. In those cases where it is determined that internal controls are not adequate, PCPS PCard Administration has the authority to request policy improvements and/or place card restrictions on the College/Division PCard program until such controls are established, documented, and implemented.

<u>Approvers:</u>
Approvers are those responsible for the authorization and approval of expenses of employees. The approval workflow in MyExpenses includes the following roles:

- Supervisors and/or Task Managers: responsible for reviewing each expense report to ensure the expenses are allowable, allocable, and reasonable to the funding account/award:
    - Allowable – Cost must conform to any limitations or exclusions set forth in the sponsored agreement.
    - Allocable - Cost has been incurred solely to support or advance the work of a specific sponsored research award or account.
    - Reasonable – cost must be able to withstand public scrutiny.
- Financial Transaction Approver: responsible for ensuring that all relevant policies and procedures have been followed, a correct accounting string was used, and funds are available in the account being charged.
- Additional approval groups as applicable to the expense report (i.e., special approvals for athletic recruiting, study abroad expenses, etc.).

<u>Delegating approval:</u>
Approvers are accountable even if they delegate someone else approval authorization.

- Delegation of approval authority is not granted by giving out your login ID and Password.
- Delegation of approval authority must be performed within the University's expense tool.

- If an approver designates another employee as their approval delegate, the approver delegating the authority is still responsible for any expense approved by their delegate. That approval delegate must be knowledgeable of the applicable policies, procedures, and sponsor requirements.

<u>Segregation of duties:</u>
The Financial Management Director is responsible for ensuring segregation of duties occurs within the MyExpenses system. If a College/Division is not included within the scope of the Shared Services Center, the Strategic Business Advisor is responsible for the segregation of duties for their College/Division. This includes, but is not limited to the following:

- Employees who serve in the Financial Transaction Approver role shall not approve their own expense reports.
- Employees who serve in the Financial Transaction Approvers role shall not approve their direct supervisor's expense reports.
- Approvers who approve at the Supervisor/Task Manager shall not approve the same expense reports at Financial Transaction Approval role.

Reconciliation of PCard Expenses in MyExpenses

Reconciliation of all PCard transactions must be done in MyExpenses. Cardholders must review all transactions that appear on their profile in MyExpenses to ensure they are legitimate, for official University business, and that all required documentation is included.
PCPS PCard Administration is responsible for ensuring the reconciliation of the monthly card statement to the transactions in MyExpenses has been completed.

Receipt Requirements

An itemized receipt must be uploaded and attached to the applicable expense in MyExpenses for each transaction placed on the PCard. The receipt must be legible, itemized (reflecting the goods/services purchased), and contain the vendor's name, date of purchase, and price of items. A receipt description, which only states "Miscellaneous" or "Merchandise" or only includes a vendor's stock or item number is not acceptable.

If an acceptable form of receipt is not available, the cardholder must complete the PCard Receipt Exception Form and attached to the expense in MyExpenses. This form can be found here. This form should be used only as a last resort and repeated use of this form may result in card privileges being revoked.

Documentation for each transaction must include:
- Itemized receipt.
- Appropriate business purpose.
- Additional documentation required for certain purchases (i.e., hospitality information, gift card approval, approval by PCPS of unallowable purchases, etc.).

Cardholders should submit their expense reports on a weekly or biweekly basis (i.e., the prior week's charges). Charges <u>must</u> be reconciled within 30 days from the date the transaction posted at the bank. Do not submit more than one expense report within a week period. If Cardholders have multiple charges, they should be added to one expense report.

- Cardholders with transactions that have not been fully reconciled in MyExpenses after 30 days from that posted date will receive a notification via email that the transactions must be reconciled within 15 days or their PCard will be lowered to $1.
- If cards are lowered to $1, all transactions must be reconciled, and a PCard Application & Changes form must be submitted in Mountaineer Marketplace before the original card limits will be reinstated. 30 violation points will also be assigned.
- Cardholders with transactions over 90 days old will be notified that their PCard has been canceled. The cardholder must then start the application process over (request form and online training) if they wish to obtain a new PCard. PCPS PCard Administration reserves the right to decline requests to reinstate card privileges.

Cases of cardholders who repeatedly do not reconcile their charges within the 30-day period may be shared with the appropriate HR Partner to determine whether disciplinary action is warranted.

What is an "appropriate business purpose"?

An appropriate business purpose must be included for each transaction within MyExpenses. The business purpose is the specific business need for the goods or services purchased. This explanation should be brief yet also detailed enough that an external party could determine how this purchase related to University business. The business purpose should indicate why the expenses are reasonable, appropriate, and needed for University business, not simply what was purchased. For transactions funded by sponsored awards, the business purpose must be determined by reviewing the award's purpose, terms, and conditions. Examples of acceptable business purposes can be found here:

Review of Expense Reports Completed through MyExpenses

All expense reports must be reviewed through MyExpenses by the Supervisor/Grant Approver and the Financial Transaction Approver to ensure the following:

- An itemized and legible receipt is attached for each transaction.
- An appropriate business purpose is provided.
- The expense is allowable, allocable, and reasonable to the funding account/award and in compliance with all applicable policies and procedures.
- Any additional required documentation is provided.
- The proper accounting codes have been assigned to each transaction.

Records Retention

WVU's Record Retention Policy & Schedule must be followed for the retention of all PCard receipts, applications, and additional documentation. This policy can be found here.:

This policy does not supersede any retention requirements imposed or required by any federal, state, or local granting/contract agency.

SECTION VII: TRANSACTION REVIEWS

The PCard is a privilege, not a right, and action will be taken for all misuse, abuse, or fraud that occurs on the PCard. PCPS PCard Administration must be notified of any fraud, misuse, or abuse. This notification must include any documentation supporting the claim.

Card Misuse and Abuse

Misuse/Abuse is the improper, unlawful, or incorrect use, compromise, or misapplication of the PCard. Examples include, but are not limited to:

- Failure to maintain security protecting your PCard and/or card information.
- Paying for items for which the PCard is not authorized.
- Using the PCard to violate Procurement policies and procedures. This includes using the PCard to purchase/pay for items that should have been processed through Mountaineer Marketplace.
- Failure to provide required documentation in MyExpenses.
- Card Delegation.
- Stringing.
- Failure to obtain required authorization prior to purchase.

Fraud

Fraud is a deception deliberately practiced in order to secure unfair or unlawful gain. Intentional use of the PCard to make purchases for personal use or for another individual is fraudulent and is prohibited.

Individuals using the PCard to knowingly pay for items intended for personal use will be subject to disciplinary action up to and including termination and prosecution under state law and may be subject to civil action by the credit card company for personal liability.

Reviews Completed by PCPS PCard Administration

Program evaluations and random compliance inspections of PCard transactions will be conducted by PCPS PCard Administration to ensure compliance with all PCard Policies and Procedures.

Failure to Follow PCard Policies and Procedures

Cardholders failing to properly follow the PCard Policies and Procedures will be subject to action up to and including revocation or limitation of PCard privileges, a period of probation, and/or mandatory PCard training, as well as any corrective disciplinary action that may be taken by the Supervisor and/or department.

Misuse/abuse/fraud of the PCard will be handled promptly and uniformly for all cardholders. A point system has been established to assess violations. Table 5 lists each type of violation, and the points assigned.

Table 5: PCARD VIOLATION POINTS SYSTEM

Violation	Point Value
Authorizations/prior approvals not received (i.e., gift card approval, ITS approval, $10,000 or greater approval)	30
Card delegation	100
Card security violations	50
Lack of documentation (itemized receipt, appropriate business purpose, required additional documentation)	10
Personal purchase (intentional)	150
Personal purchase (accidental)	50
Unallowable purchases (see Table 3; i.e., alcohol, meals while on travel, fuel in personal vehicle, etc.)	50
Unreconciled transactions 45 days past the statement date or older	30
Stringing of purchases	100
Wrong procurement method (i.e., Mountaineer Marketplace should have been used)	50

The number of points assigned to each cardholder will remain on file within PCPS PCard Administration. Table 6 explains the action that will be taken once the cardholder has reached specific point totals. Please note: the total points per cardholder includes all points assigned to the cardholder over a rolling three (3) year period.

If card privileges are revoked, PCPS PCard Administration, at its sole discretion, may elect to reinstate the privileges after additional training or other corrective measures have been completed, depending on the severity of the violations. Remember: PCPS PCard Administration reserves the right to suspend a cardholder's PCard privileges at any time if it is deemed to be appropriate, pending the completion of any investigation, or if the severity of the violation warrants such action.

Table 6: PCARD DISCIPLINARY STEPS	
Total Points (3 Year Total)	**Actions Taken by PCPS PCard Administration**
Under 100	• Corrective Notice by Email
100	• Corrective Notice by Email • Mandatory Retraining • Counseling by PCPS PCard Administration (if deemed necessary)
150	• Formal Memo • Card Cancellation

*Financial Transaction Approvers, who are also cardholders, will have their approver access removed if they reach 150 points and potential referral Employee Relations.