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INTRODUCTION

1.1 Overview

The Villanova University Procurement Card Program has been established to provide departments with a convenient and efficient means to purchase low dollar items for the University and at the same time reduce the costs associated with initiating and paying for purchases. The card program has also been established to provide an efficient means of paying for University approved business travel.

The Procurement Card Program is provided through Bank of America's Commercial Card Services. Procurement Cards are issued in the name of the employee, for the purpose of making authorized purchases on the University's behalf. No one other than the cardholder whose name is on the card is authorized to use the card. Payment will be issued directly to Bank of America by the Procurement Office for these authorized charges. Each department is responsible for the integrity and accuracy of their Procurement Card purchases.

It is the responsibility of the Procurement Office to oversee all aspects of the Procurement Card Program. These responsibilities include authorization of new cards, the monitoring and auditing of current cardholder accounts, and verifying that the Procurement Card Policy and Procedures are being followed.

Cardholders have the responsibility of reconciling their charges in the NOVApay (Concur) system in a timely manner, as indicated in the procedures below. Cardholders may assign delegates to assist in this process but must be the person ultimately submitting the expense for approval. Cardholders shall read, understand, and follow all of the Procurement and University rules regarding purchasing. Cardholders will not make purchases from vendors that are a conflict of interest prior to having the purchase approved by the Procurement Office, and cardholders will not purchase from any debarred vendor of the United States Department of Labor list.

The Procurement Office reserves the right to terminate/rescind a Procurement Card at any time. Fraudulent use or misuse of the Procurement Card may result in disciplinary action under standard University Disciplinary Policy, as stated by Human Resources, up to and including discharge and termination.

1.2 Eligibility

The Procurement Card Program is available to **full-time** Villanova employees. Generally the Procurement Card is used for employees that anticipate spending more than \$2,500 per year on the card. Only one Procurement Card will be issued to an employee. The departmental Vice President, Dean, Director or Budget Manager, and the Director or Assistant Director of the Procurement Office must approve each application request. Procurement Cards will be issued to employees who do a large amount of traveling for the University and/or have buying responsibilities for the University. If you have been issued a Villanova Procurement Card, you are required to use this card for all allowable business purchases and University travel related expenses, otherwise your card will be canceled.

1.3 Card Limits

Purchases are limited to \$2,500 per transaction, with a monthly limit of \$7,500. Higher or lower limits may be granted for those cardholders with special circumstances. You may request a temporary limit increase by completing the [Limit Increase Request Form](#). This request must be approved by the departmental Vice President, Assistant Vice President, Dean, Director or Budget Manager, and the Director or Assistant Director of the Procurement Office. Increased limits are generally permitted for departments purchasing from already established contracts or for other special circumstances. If higher limits are granted, only the approved items or services are allowed above the standard limits indicated above. Contact the Procurement Card Administrator for further details.

CARD PROGRAM RESPONSIBILITIES

2.1 Cardholder Responsibilities

- Accountability for all purchases with respect to departmental budgets and policies, as well as this policy.
- Make purchases with preferred and/or contracted vendors whenever possible.
- Avoid making purchases from debarred companies in accordance with the Federal Acquisition Regulation (FAR) section 9.4.
- To submit Procurement Card charges in expense reports in the Concur system in a timely manner each month. This includes verifying/changing budget index numbers and expense types, adding acceptable comments to explain what was purchased, and uploading an image of the receipt. Failure to complete on a monthly basis will result in budgets not being properly charged and will lead to suspension or termination of card privileges.
- Be prepared for an audit of expense reports in the Concur system at any time.
- Contact the Procurement Office and Bank of America immediately for fraudulent charges and/or a lost/stolen card.
- Retain all documentation not uploaded to Concur for 7 years.
- Notify the Procurement Office if leaving the University or transferring departments, and leave all documentation with the cardholder's supervisor/manager.

2.2 Manager/Supervisor Responsibilities

It is the responsibility of the Manager/Supervisor to ensure the proper use of the Procurement Card by their cardholders within their hierarchy, as outlined in this policy, and to ensure that the cardholders who report to them properly document their charges on a monthly basis. Their responsibilities include:

- Ensuring the proper use of the Procurement Card by the cardholders within their hierarchy, as outlined in the Procurement Card Policy and Procedures, and keeping purchases within budget.
- Reviewing charges and inquire about any charges that are not within policy or that a reasonable price was not paid. To disallow charges when not within policy (contact the Procurement Office with any questions or concerns).
- Ensuring that the cardholders in his/her department are properly documenting their charges on a monthly basis, including changing budget index numbers/expense types, adding acceptable comments to explain what was purchased, and uploading an image of the receipt.
- Approving all expense reports in the Concur system on a regular basis. All charges from the prior month must be approved by the 31st.
- Notifying the Procurement Office when a cardholder leaves the department or is terminated, and to secure and destroy the Procurement Card and keep the Procurement Card records for the exiting employee available for audit purposes.
- Requesting a card suspension when a cardholder is on an extended leave or sabbatical.

2.3 Budget Index Approver Responsibility

It is the responsibility of the Budget Index Approver to ensure that cardholders' charges are allocated to the correct budget index and that all details for the charges are accurate and complete. Their responsibilities include:

- Ensuring that the expense reports he/she is approving have been allocated to the correct budget index number and expense type. The budget index number must be reviewed for each expense to ensure that it will be reflected properly in Banner.
- Ensuring that acceptable comments have been added to each charge to explain what was purchased.
- Ensuring that a proper receipt image has been uploaded to each charge. The receipt must be itemized and the final price must match the charge price.

- Reviewing charges and inquire about any charges that are not within policy or that a reasonable price was not paid.
- Approving all expense reports in the Concur system on a regular basis. All charges from the prior month must be approved by the 31st.

USING THE PROCUREMENT CARD

3.1 Unauthorized Card Use

Examples of Purchasing Card Violations:

- Personal charges, even with the intent of reimbursing the University.
- Traveler's checks or cash withdrawals from ATMs.
- Gasoline purchases for personal vehicles.
- Inter-departmental charges.
- Travel insurance for accidental death or lost baggage.
 - Insurance for flight/train changes may be purchased, but cost must be minimal.
- Computer software over \$4,999.00 is prohibited.
- Printers are not allowed to be purchased unless from our [contracted printer vendor](#).
- Office furniture (please see additional details below).
- Gifts: No gift or gift card purchases are permitted for Villanova employees or student employees, except the approved gifts detailed in the following section.
- Books and fees for classes related to the pursuit of an undergraduate or graduate degree.
- Transactions exceeding cardholder limits.
 - Asking the vendor to split a charge into two separate transactions to meet the transaction limit is **unacceptable**.
- Honorariums.
- Construction, renovation, and installation services.
- Capital equipment.
 - Equipment with a cost exceeding \$5,000.00 requires special tracking by the Accounting Department.
- Rents and leases.
- Controlled substances.
- Hazardous chemicals, materials, and environmental risk items.
- Purchases involving trade-in of University property.
- Donations.
 - Only allowable donations are donations for bereavement, and the family is not accepting flowers or food baskets.
- Internet Access: No personal internet access is allowed, even for business use, except during travel at hotels and on lengthy flights.
- Cell Phone: No personal cell phone charges are allowed, even when used for business purposes. Cell phone purchases for University use should be done through Telecommunications and with the appropriate Vice President's approval.
- All unallowable charges as indicated in the [Travel and Business Policy](#).
- Due to new Pennsylvania (PA) state regulations, the Procurement Card can no longer be used to pay individuals for Services (Companies or Incorporated vendors are still acceptable). These individuals are considered 1099 taxable individuals and Villanova University is now required to withhold tax in accordance with the PA 1099 state policy. These types of services must be paid through the Procurement Office. Please contact the Procurement Office with any questions. Expense reports that include payment to individuals for Services will be considered a failed audit and will be assessed 50 points upon review.
- Software Purchases – All software purchases or software renewal licenses must have an IT Software Review form completed by the cardholder. Through completion of the short form, you will either be (a) directed to contact UNIT for further review or (b) notified that your order has been approved and you may continue with your software purchase. This IT Software Review form must be completed prior to placing your order and must be attached with your receipt. Expense reports that include software purchases without the [IT Software Review form](#) will be considered a failed audit and will be assessed 50 points upon review.
- Gift Cards or Gifts cannot be purchased to pay for Honorariums or to pay individuals that perform services.

3.2 Gifts

- Gifts and gift cards for an employee or student employee may not be charged to the Procurement Card. Gift Cards or Gifts cannot be purchased to pay for Honorariums or to pay individuals that perform services.. The only allowable gifts are the following:
 - *Length of service/retirement award:* In recognition of an employee's length of service at Villanova or if the employee is retiring, a gift can be purchased on the Procurement Card. The gift must be in the form of tangible property (not cash).
 - *Illness/medical procedure of an employee or student, requiring hospitalization:* Get well gifts made on behalf of the employee/student may include flowers or a food basket.
Death of an employee/student or an employee's/student's immediate family member: Bereavement gifts made on behalf of the employee/student may include flowers or a food basket. Donations on behalf of the employee/student employee are only allowed if the family is not accepting flowers or food baskets.
 - *New baby for an employee:* Congratulations gifts for a new baby made on behalf of an employee may include flowers or a food basket.

*****IRS guidelines state that taxes must be paid by the recipient of a gift that is more than a nominal value. If a gift is purchased for an employee or student employee that is more than a nominal value, the [Non-Cash Gift Form](#) must be submitted to the Payroll Office for tax reporting purposes. A copy of this form must be attached to the charge in Concur.*****

3.3 Business Meals

- Meal amounts must be of a reasonable cost for that location and adhere to the [Travel and Business Expense Policy](#).
- **Recruiting:** Recruiting related meals may be charged to the Procurement Card with approval from your supervisor. Meals must be for a reasonable amount.
- **Meal Purchases:** All meal purchases must be for a specific business purpose. When dining with other Villanova employees, the employee with the highest ranking must purchase the meal. When signing off on meal charges in Concur, the names of the attendees and business purpose of the meal must be included in the description.

3.4 Office

- **Supplies:** All office supplies should be purchased from Office Basics. Keeping in mind that Office Basics offers free overnight delivery, only emergency office supplies should be purchased on the Procurement Card from local suppliers.
- **Snacks:** Office snacks are allowed to be purchased for students and guests only.

3.5 Furniture

- No office furniture can be purchased on the Procurement Card without prior approval from the Procurement Office. All furniture purchases must be made through Pat Higgins in the Procurement Office.

*****The Procurement Office must approve any/all exceptions. Contact the Procurement Card Administrator for further details.*****

3.6 Items That Should Be On the Procurement Card

- Airline/train tickets.
- All subscriptions/renewals.
- Memberships.
- Annual dues.
- Conference/seminar registrations.
- Florists.
- Water delivery service.
- All purchases at the University Shop made by University departments must be purchased with a Villanova Procurement Card.
- Other purchases less than \$2,500 that are not listed as unallowable charges.

3.7 Sales Tax

Villanova University is a tax-exempt organization due to its status as a non-profit educational institution. When making a purchase, please inform the vendor of our exemption. Our Pennsylvania Tax-Exempt Number is located on the front of the Procurement Card. If the vendor requests an actual Tax-Exempt Form, one may be obtained from the Procurement Office website. Please be aware that even though we are tax-exempt for most purchases, a vendor may not accept our exemption. In such cases, either make the purchase at a different vendor or allow the vendor to charge you the sales tax.

3.8 Preferred Vendors

To ensure that departments receive superior customer service and competitive prices, the Procurement Office has named preferred vendors for selected commodities and services. It is highly recommended that you use one of these vendors when purchasing goods or services. The vendor's name, address, phone number and additional information such as discounts, special services, and shipping information are available on the Procurement Office webpage. The preferred vendor list may be found at the [Preferred Vendor page](#).

3.9 Code of Ethics

Each cardholder has been given the authority to purchase on behalf of the University. In doing so, we ask each cardholder to follow the Code of Ethics listed below:

1. Give first consideration to the objectives and policies of the institution.
2. Strive to obtain the maximum value for each dollar of expenditure.
3. Decline personal gifts or gratuities.
4. Grant all competitive suppliers equal consideration insofar as state or federal statute and institutional policy permit.
5. Conduct business with potential and current suppliers in an atmosphere of good faith, devoid of intentional misrepresentation.
6. Demand honesty in sales representation, whether offered through the medium of a verbal or written statement, an advertisement or a sample of the product.
7. Receive consent of originator of proprietary ideas and designs before using them for competitive purchasing purposes.
8. Make every reasonable effort to negotiate an equitable and mutually agreeable settlement of any controversy with a supplier and/or be willing to submit any major controversies to arbitration or other third-party review, insofar as the established policies of my institution permit.
9. Accord a prompt and courteous reception insofar as conditions permit to all who call on legitimate business missions.
10. Cooperate with trade, industrial, and professional associations, and with governmental and private agencies for the purposes of promoting and developing sound business methods.
11. Foster fair, ethical, and legal trade practices.

3.10 Shipping of Product

All purchases made on behalf of Villanova University must be shipped to a Villanova University address. Any exceptions must be pre-approved by the Procurement Office and clearly noted on the "Comment line" in NOVAPay as to why this was necessary. Expense reports that include purchases shipped to an address other than a University address without pre-approval by the Procurement Office will result in a failed audit and will be assessed 40 points upon review.

CARDHOLDER PROCEDURES

4.1 Obtaining a Procurement Card

To obtain a Procurement Card, please click on the [Application link](#) on the Procurement Card webpage. Fill the application form out completely and click on the Submit button. This will send an email to the Procurement Card Administrator, who will then send an email to the applicant with the link to the training in the Blackboard system. Each Procurement Card applicant must view the videos and pass the online quizzes. Once you have successfully passed the online training, a Cardholder Agreement Form will appear within Blackboard. Please fill out the form completely and submit it to your supervisor/budget manager for approval. Your Vice President, Dean, Director and/or Budget Manager must sign the Agreement Form and return it to the Procurement Office. The Procurement Card Administrator and the Director of Procurement or the Assistant Director of Procurement must approve the application before the card can be ordered. When the card is received in the Procurement Office, the cardholder is called or emailed to pick up his/her card in the Procurement Office. Proper ID will be required. Prior to using the Procurement Card, the University Policy and Procedures must be reviewed to ensure proper use. Procurement Cards will not be placed in campus mail.

4.2 Review of Monthly Charges

Report Periods: Reporting period is from the first day to the last day of the month.

Charge Review: On the first day of the month, the Procurement Office will send a reminder email to all Procurement Cardholders to submit their monthly expense reports in the Concur system. Charges are available for review on the Concur website a few days after the charge has posted to Bank of America. There may be a few days difference between the transaction purchase date and the posting date. Some transactions may be purchased in one billing cycle but won't post to Bank of America until the next billing cycle.

Charge Reporting/Approvals: All cardholders must submit their Procurement Card charges in an expense report each month. The cardholder must complete the following 4 items for each charge:

- Verify/change the expense type.
- Verify/change the budget index number (cardholders have access to all budget index numbers).
- Attach a receipt image to the charge.
- Write in a description of the charge in the comment section.

Expense Type – It is required that you use the correct expense type when reconciling your charges. Incorrect expense types will be corrected by the Procurement Office without notifying the department.

Business Purpose – Each expense line within your NOVApay (Concur) Expense report must have a detailed "Business Purpose" clearly defined in the Business Purpose or Business Description/Destination field. The comment line can be used for additional space if needed. Expense reports not containing this information will be considered a failed audit review. Expense reports will be returned to the individual and 20 points will be assessed. When appropriate, the business purpose should include the following:

- Who incurred the expense or who benefited; specific names of individuals/groups are required (when the expense did not directly benefit the cardholder), e.g. business meals, bereavement flowers, who was the iPad purchased for, etc.
- What was specifically purchased (if not clear from the Expense Type description), e.g. "Supplies" purchased from Amazon would require further description on what was specifically purchased.
- Why the Expense was necessary (what was the purpose) if not clearly derived from the Report Header and other Business Purpose information previously provided.

The cardholder will submit the expense report, which is then sent to the appropriate manager for approval. The manager will review the expense report for completeness, including proper allocation, comments, and imaging of receipts.

Instructions for completing these steps are available on our [NOVApay website](#).

Monthly Deadlines:

Cardholder

Cardholders are required to submit their monthly Procurement Card transactions through the NOVApay (Concur) system in a timely manner. All cardholders have until the 10th of the following month to submit their charges in NOVApay. Cardholders who do not submit their charges by the 15th of the month will receive 30 points (as outlined in the Cardholder Audit details in Section 5.1). For example, if a cardholder has charges in September, and if those charges are not submitted by October 15th, the cardholder will receive 30 points. If a cardholder reaches 100 points, a card will be suspended.

Supervisor

Supervisors are required to review all charges and approve charges within two weeks of receiving the report in Concur. Supervisors who do not approve within the allowed time frame may have all Procurement Cards within their area revoked.

Index Approver

Index Approvers are required to review all charges and approve the charges within the same 2 week deadline as the Supervisor. Index Approvers who do not approve charges within the allowed time frame may lose their duties as an Index Approver.

*****Regardless of when the report is received, all approvals are required by the end of the month. For example, a September charge is required to be approved by October 31st by both the Supervisor and all Index Approvers.*****

4.3 Receipt Retention

All receipts must be uploaded into Concur and matched with the appropriate transaction. If a cardholder does not have a receipt, the cardholder must contact the vendor to request a copy of the receipt. If the vendor is not able to provide a receipt, a Missing Receipt Affidavit must be completed in Concur. This will take the place of the missing receipt. Please note that while the Missing Receipt Affidavit can be used in place of the receipt, the Procurement Office will monitor any excessive use of the Missing Receipt Affidavit. Excessive missing receipts will result in loss of Procurement Card privileges. A paper missing receipt affidavit is not allowed and will be considered a missing receipt

Original Receipts

The cardholder is responsible for getting an original itemized receipt for every purchase. If an original receipt is not available, the following types will be accepted: •

- Faxes or photocopies. •
- Screen prints or confirmation e-mails for web purchases.

Handwritten receipts and credit card statements are unacceptable and will be counted as missing receipts if attached to a transaction in Concur. All receipts must show the vendor name, date of the purchase, items purchased, and amount of the purchase. If these are not visible/legible on the receipt, it does not qualify as a receipt and will be counted as a missing receipt.

The following is a list of acceptable receipts for various purchases:

- Hotel accommodations: Itemized hotel bill.
- Meals: Original, detailed/itemized restaurant receipt. A hand-written receipt is unacceptable.
- Travel: Flight or train receipt must show departure and arrival location, class of seat, vendor, dates, and total amount.

TRANSACTION AUDITING

5.1 Cardholder Audit

The Procurement Office will review and approve all submitted expense reports in the Concur system. The Procurement Office will review all charges to ensure they are following University Policy. If approved, the transaction will be processed and will be charged to the budget index that the cardholder requested. Unapproved transactions will either be sent back to the cardholder or the cardholder will be contacted for an explanation of charges.

A point system has been established to document any violations of the Procurement Card Policy. As violations are discovered, points will be assessed. If a cardholder reaches 100 points, his or her card will be suspended for 1 month and the cardholder's supervisor and budget manager will be notified. Cards can be reinstated by completing an online training course on the policies and procedures for the Procurement Card. Completing this online training will reduce the cardholder's points by half. Reaching or exceeding the 100 point limit for a second time (over any time period) will result in permanent cancellation of card privileges. Every fiscal year, cardholder point totals will be reduced by half.

The following outlines the violations and corresponding points:

- Personal charge 30
- Splitting a transaction 40
- Unallowable charge 20
- Excessive missing receipts 30
- Charges not submitted by the 15th of each month 30
- Not including a detailed business explanation 20
- Paying an individual for services 50
- Purchasing software without an IT Software Review 50

NOTE: The Procurement Office reserves the right to terminate/revoke a Procurement Card at any time. Fraudulent or misuse of the Procurement Card may result in disciplinary action under standard University Disciplinary Policy, as stated by Human Resources. This may include termination.

NOTE: If a card is cancelled, the card must remain cancelled for 1 year. After the completion of a year, the employee may request that their card be reinstated. Reinstating a card will be determined by the Procurement Office, the Controller's Office, and the employee's supervisor and department budget manager.

5.2 Supervisor and Index Approver Audit

The Procurement Office monitors the efficiency in which supervisor and index approvers approve expense reports. Expense reports must be fully approved by all approvers by the end of month. For example, a September charge is required to be approved by October 31st by both the supervisor and index approvers.

A point system has been established to document any violations of the approval timeframe. Supervisors and index approvers will receive 20 points for any reports not approved by the end of the month. Supervisor or index approvers who reach 100 points will need to complete online training and the budget manager within the employee's area will need to approve the employee continuing as an approver. Reaching 100 points may also result in revoking all Procurement Cards within the approver's area. This will be determined at the discretion of the Procurement Office and the Controller's Office.

5.3 Fiscal Year Audit

At the completion of the fiscal year, the Procurement Card Administrator will review the total number of cards that have been issued within each of the departments. The Procurement Card Administrator will make recommendations to the Vice President, Dean, Director or Budget Manager regarding the appropriate number of cards for their area. These will be based on the following:

- Size of each department.
- Amount of money spent on cards during prior fiscal year.
- Number of transactions on cards during prior fiscal year.

NOTES

6.1 Billing Discrepancies

It is the responsibility of the cardholder to resolve any discrepancies directly with the vendor and to request credits or additional charges be generated for the next billing cycle. If unable to resolve these discrepancies, the cardholder must contact Bank of America or the Procurement Card Administrator to dispute any charges. Charges can only be disputed with Bank of America within 60 days of the statement closing date.

6.2 Cancelling a Card

If a cardholder leaves the University, the Procurement Office should be notified immediately. The employee's card will be cancelled by the Procurement Office 1 week before the cardholder's scheduled last day. The card should then be shredded or returned to the cardholder's Department Head or the Procurement Office to be shredded. All pending charges must be submitted in an expense report before the cardholder's last day.

6.3 Lost/Stolen Card or Fraudulent Charges

As soon as a cardholder discovers that his/her card is lost, stolen, or that fraudulent charges have been processed on the card, the cardholder must notify Bank of America at 1-866-500-8262 immediately to limit the University's liability for fraudulent purchases. The cardholder must then notify the Procurement Card Administrator. A new card will be shipped out to the cardholder.

Any fraudulent charges will be credited back by Bank of America. The credits will appear in Concur, along with the fraudulent charges. Both the fraudulent charges and the credits must be submitted in an expense report. When submitting the fraudulent charges and the credits, the "Fraud – Pcard Only" expense type must be selected for both the fraudulent charges and the credits. This expense type will not require a receipt. A comment must be added to both the fraudulent charges and the credits, noting that they are fraudulent charges and credits from Bank of America.

6.4 Departmental Change

When moving to a new position, it is not necessary to close a cardholder's account. If a cardholder's new position requires retention of his/her card, the [Account Maintenance Form](#) must be completed and submitted to the Procurement Card Administrator.

6.5 Contact Information

Procurement Card Administrator
Procurement Office
Phone: 610-519-7445
Fax: 610-519-7716
E-mail: procurementcard@villanova.edu