

POLICY No. BAA-F02

INTERNAL/DEPARTMENTAL POLICY AND PROCEDURE

TITLE:	Travel Card/ Controlled Billed Account (CBA) Policy
EFFECTIVE DATE:	*September 26, 2014 (*State Regulations Update Effective 8/31/18)
CANCELLATION:	None
CATEGORY:	Travel and Reimbursement (F)
RESPONSIBLE DEPARTMENT:	Controller's Office

POLICY STATEMENT

Delgado Community College is authorized by the Louisiana Community and Technical College System Policy #5.018, LCTCS Policy for La Carte Purchasing Card and CBA Policy to administer the College's Travel Card/ Controlled Billed Account (CBA) Program, and as a State agency, must adhere to certain State and Federal regulations and laws. Delgado's Travel Card/CBA Program Administrator is designated by the Chancellor to coordinate, monitor and oversee the Travel Card/CBA Program. Cardholders/ CBA Administrators are expected to make sound business decisions in the best interest of the College and must comply with the requirements, policies, and procedures contained in this policy, those outlined in the application and the cardholder agreement, as well as any revisions by the College pertaining to this program.

In accordance with the <u>State of Louisiana Liability Travel Card/CBA Policy</u>, the State of Louisiana Purchasing Travel Card/CBA is a tool used to assist employees in paying for specific, higher cost travel expenses, incurred during travel for official state business. Delgado Community College maintains CBA accounts to book higher cost travel expenses, including airfare, lodging, registrations and vehicle rentals. On an as-needed basis, the College reserves the right to issue individual Travel Cards or CBA accounts to employees or departments when deemed necessary. In accordance with Office of State Travel regulations, use of the CBA or Travel Card is mandatory effective November 1, 2014, all of the higher cost travel items as described above. Each transaction must be in compliance with <u>PPM 49 (the state's general travel regulations)</u>, all current state purchasing and travel rules and regulations, statutes, executive orders, and policies, as applicable, as well as the College's <u>Professional Leave and Travel Policy</u>.

POLICY AND PROCEDURES

1. Purpose

To establish policies and procedures for administering the <u>State of Louisiana Liability</u> <u>Travel Card/CBA Policy</u> at the College.

2. Scope and Applicability

This policy and procedures memorandum applies to all authorized Travel Cardholders/ CBA Administrators and the employees responsible for authorizing purchases. For the purposes of this policy, the term "Cardholder" applies to the Travel Cardholder and the Controlled Billed Account (CBA) holder.

3. **Definitions**

Agency - Delgado Community College, as a state agency, arranges with card issuer for the issuance of a CBA/Travel Cards to authorized College employees and agrees to accept liability for their employees' use of the cards.

Approver - The Cardholder's supervisor, or the most logical supervisor that is at least one level higher, which would be most familiar with the business case and appropriate business needs for the Cardholder's transaction and is responsible for approving transactions online and signs the receipts, Cardholder's log, and monthly bank statement.

Billing Cycle Spending Limit - A maximum dollar limit assigned to the Cardholder for the total of all charges made during the billing cycle.

Budget Account Allocation – The Budget Account Allocation includes the Fund, Organization, Account/Campus, and Program of the department that is charged for the purchase. (The budget account allocation is *whose budget is charged* for the purchase, and the account code describes *what* was purchased.)

Cardholder- An employee who is approved by the Chancellor's designee, the Travel Card/CBA Program Administrator, to use the Travel Card/CBA to execute purchasing transactions on behalf of the College. The Cardholder's name appears on the Travel Card/CBA and that person is accountable for all charges made with the card. The Cardholder must never be the final approver of his/her transactions.

Cardholder/CBA Administrator/Approver Agreement Forms –Forms signed annually by the Program Administrator, a Cardholder, and Approver that acknowledges each has received required training, understand the Travel Card/CBA Policies, both State and the College, completed the state's certification requirement, and accepts responsibility for compliance with all policies and procedures.

Cardholder Enrollment Form – A form that initiates the Travel Card issuance process for the Cardholder.

Card/CBA Issuer – The financial institution whose services were contracted for by the State of Louisiana, to issue Travel Card/CBA to State Employees, to provide electronic transactions and billing to the agencies for all purchases made on the cards/CBAs, and to collect payment from the agencies.

Controlled Billed Account (CBA) –a credit account issued in an agency's name (no plastic card issued). These accounts are direct liabilities of the State and are paid by each agency. CBA accounts are controlled through a single authorized accountholder/authorizer to provide means to purchase any allowed transactions/services allowed in the current <u>State of Louisiana Liability</u> <u>Travel Card/CBA Policy</u>. Although other travel related charges are now allowed on the CBA account, the traveler should be aware that there is no plastic issued for a CBA to ensure that this will not impair travel plans.

Cycle – The period of time between billings. For example, the State of Louisiana Travel Card closing period ends at midnight on the 8^{th} of each month. Synonymous with "billing cycle"

Cycle Limit –maximum spending (dollar) limit a Travel Card/CBA is authorized to charge in a billing cycle. These limits should reflect travel patterns. They are preventative controls and, as such, should be used judiciously.

Default Budget Account Allocation - The Delgado budget account allocations (includes the Fund, Organization, Account/Campus, and Program) assigned to an individual card/CBA, which will be charged for purchases by the Cardholder unless otherwise specified.

Department Head – An elected officer, an appointed officer, the executive head of a state agency or President of a College or University.

Disputed Item – Any transaction that was double charged, charged an inaccurate amount, or charged without corresponding goods and services by the cardholder.

Fraud – Any transaction, intentionally made that was not authorized by the cardholder or not for Official State Business.

Incidental Expense – expenses incurred while traveling on official state business, which are not allowed on the state liability travel card/CBA. Incidentals include, but are not limited to, meals; fees and tips to porters, baggage carriers, bellhops, hotel maids; transportation between places of lodging/airport such as taxi; phone calls and any other expense not allowed as per the <u>State of Louisiana Liability Travel Card/CBA Policy</u>.

Merchant –a business or other organization that may provide goods or services to a customer. Synonymous with "supplier" or "vendor."

Merchant Category Code Group (MCCG) – a defined group of merchant category codes. MCCGs, which are used to control whether or not cardholders can make purchases from particular types of merchants.

Merchant Category Code (MCC Code) –standard code the credit card industry uses to categorize merchants based on the type of goods or services provided by the merchant. A merchant is assigned an MCC Code by the acquiring bank.

Policy and Procedure Memorandum 49 (PPM49) –the state's general travel regulations. These regulations apply to all state departments, boards and commissions created by the legislature or executive order and operating from funds appropriated, dedicated, or self sustaining; federal funds, or funds generated from any other source.

Receipt – A merchant-produced original document that records the relevant details for each item purchased including quantities, amounts, a description of what was purchased, the total charge amount and the merchant's name and address (e.g. sales receipt, original invoice, packing slip, credit receipt, etc.) This must match the online transaction amount and be matched to any other related documentation regarding the transaction.

Single Purchase Limit (SPL) - the maximum spending (dollar) limit a Travel Card/CBA is authorized to charge in a single transaction. The SPL limit may be up to \$5,000; however, this limit should reflect the individual's travel patterns. There are preventative controls and, as such, should be used judiciously. Purchases shall not be split with the intent of and for the purpose of evading the Travel Card/CBA single purchase limit set for cardholders/CBA Administrators.

Split Purchasing – The practice of artificially dividing a single purchase to avoid the Single Purchase Limit, which is misuse of the card as per <u>State of Louisiana Office of State Purchasing</u> regulations and <u>Executive Order "Small Purchases Procedures.</u>"

Supervisor/Budget Head - Individual(s) within the College who is responsible for requesting Travel Card/CBA for departmental employees who make official purchases may also be the Approver of the Travel Card. The Supervisor/Budget Head must be at least one level higher than the cardholder and the most logical supervisor who would be most familiar with the business case and appropriate business needs of the Cardholder's transactions. The Supervisor/Budget Head is never to be the final reviewer/approver of his/her own monthly transactions and may not possess a card/CBA for whichever program he/she is assigned the role of approver. The Supervisor/Budget Head is responsible for verifying that all charges against the Cardholder's Travel Card/CBA are authorized and made in accordance with the program guidelines and that the transaction is supported by adequate documentation.

Transaction Documentation –all documents pertaining to a transaction, both paper and electronic. The documentation is also used for reconciliation at the end of the billing cycle and is to be retained with the monthly reconciliation documentation for review and audit purposes. Examples of transaction documentation include, but are not limited to: itemized purchase receipts/invoices, (with complete item descriptions, not generic such as "general merchandise), receiving documents, credits, disputes, written approvals, airline exception justifications/approvals, travel authorizations/expense forms, etc.

Travel Card - a credit account issued in an employee's name. This account is the direct liability of the State and is paid by each agency. Travel Card accounts are tools used to assist the employee in paying for specific, higher cost travel expenses, incurred during travel for official state business only.

Travel Card/CBA Billing Cycle Log – Paper and electronic, once the agency has completed the implementation of Workflow, this log is used in the reconciliation process for travel expenses charged during the billing cycle. The log is used to document cardholder/CBA Administrator approval of charges billed by matching the paper billing statement, received from the bank, to the log and the documentation obtained from the vendor(s). Approval of the log by the cardholder/CBA Administrator can either be by signature (paper log) or electronic signoff (through WORKS Workflow reconciliation). Likewise, the designated approver, the supervisor of cardholder that is at least one level higher than cardholder, can approve by signature (paper) or electronic signoff (online in WORKS Workflow).

Travel Card/ CBA Program Administrator - Person designated by the Chancellor to coordinate, monitor, and oversee the College's Travel Card/CBA program. Serves as liaison between the Cardholders/CBA Administrators, the Supervisor/Budget Head, State of Louisiana Program Administrator, and the card issuer. Processes new card applications, changes to Cardholder information, maintains Cardholder profiles within the software provided by card/CBA issuer, while providing assistance and support to all departments within the College.

WORKS System – Bank of America's web-based system used for program maintenance, card/CBA issuing/suspension/cancellation and reporting.

4. <u>State Controlled Billed Account (CBA) Requirements/Guidelines</u>

- A. All CBA transactions must be in accordance with State Travel Regulations (PPM49 guidelines), State Purchasing Policies, Louisiana Statutes and/or Executive Orders.
- B. The purpose of a CBA is to provide a tool for agencies to assist with payment of high dollar travel expenses only.
- C. The CBA account(s) are issued in the name of the agency and the agency program administrator is the primary point of contact for administering the accounts. The agency may designate an administrator/authorizer per account. The contract travel agency must be notified of authorizers for each CBA account.
- D. CBA account(s) shall have an overall card cycle limit determined by the College, and these limits should reflect College employees' travel patterns. Therefore, these limits must be judiciously established by the College and adhered to accordingly.
- E. The College's CBA Program Administrator may establish a new or additional CBA account(s) through Bank of America's on-line system, WORKS.
- F. The CBA accounts are the direct liability of the state. The College is responsible for ensuring all accounts are paid timely and full each month with ONE electronic funds transfer (EFT) to Bank of America.
- G. CBA accounts do not allow issuance of plastic cards. These are referred to as ghost accounts. If it is determined that personal or other unauthorized charges are occurring on the CBA account, appropriate steps, up to and including dismissal, shall be taken to resolve the misuse/abuse of the account. See Section 5C, *Card Misuse*.
- H. The full CBA account number shall never be included in emails, fax, reports, memos, etc. If an account number is necessary, only the use of the last four or eight digits of the account number is to be allowed.
- I. **Each CBA administrator has the same duties, obligations and responsibilities as a travel cardholder*, as outlined throughout this policy, specifically as follows in Section 5.

5. *State of Louisiana Travel Card Guidelines

The following guidelines are in accordance with <u>State of Louisiana Liability Travel</u> <u>Card/CBA Policy</u>, as well as the Delgado's <u>Purchasing Procedures</u> and <u>Professional Leave and</u> <u>Travel Policy</u>.

A. Card Issuance Guidelines

- 1. Cards are to be issued in the name of State of Louisiana employees only.
- 2. Cardholders must be approved by appropriate College authority.
- 3. Cardholder must secure and control card at all times.
- 4. Cardholders must sign a cardholder agreement and complete training prior to a card being issued.
- 5. Cardholder must be given a copy of the State and Delgado policies and procedures for the Travel Card/CBA Program.
- 6. Cardholder must notify the College's program administrator if fraudulent charges are noticed, as the card may need to be cancelled and another card issued.
- 7. Travel Card/CBA Program Administrator must be notified if use of a card has changed and lower or higher limits are necessary.
- 8. Cardholder must never accept cash in lieu of a credit to the Travel Card/CBA account.
- 9. Cards must be embossed with State of Louisiana, Delgado Community College, Employee Name, Travel Card/CBA account number, and State tax-exempt number.
- 10. The Supervisor/Budget Head must provide default budget account allocation (includes the Fund, Organization, Account/Campus, and Program), which will be charged for supplies purchased by the Cardholder, unless otherwise specified.
- 11. Program participants, i.e. the Travel Card/CBA Administrator, Cardholders, and Supervisors/Budget Heads serving as cardholder approvers are required to complete an online certification class, annually, receiving a passing grade of at least 90 in order to receive a new Travel Card/CBA, renewal Travel Card/CBA, or remain as an administrator, approver or cardholder.
- 12. Any recognized or suspected misuse of the Travel Card/CBA program should be immediately reported to the College's Travel Card/CBA Program Administrator and may be reported anonymously to the <u>State of Louisiana Inspector General's Fraud and Abuse</u> Hotline at 1-866-801-2549.

B. Travel Card Usage Guidelines

- 1. The Travel Card/CBA is limited to use:
 - a. By individual state employees authorized by the Chancellor's designee, the Travel Card/CBA Program Administrator.
 - b. By Cardholder only.
 - c. For official state use only.
 - d. On State/College-approved Merchant Category Codes.
 - e. For only those purchases deemed necessary for official state travel.
- 2. Allowable State Liability Travel Card Transactions include:
 - Airfare
 - State Contracted Travel Agency Fees
 - Registration for Conference/Workshop
 - Membership Dues associated with registrations not for memberships to make non-travel purchases
 - Hotel/Lodging
 - Rental Car
 - Tolls in conjunction with the contracted vehicle rental
 - Parking only with hotel stay and combined on the invoice and Park-N-Fly Parking
 - Internet Services only with hotel stay and combined on the invoice
 - Gasoline for Rental Car/State Owned Car Only not to be used if the College is part of the Fuel Card Program/Contract (however, in the event that the program is not covered in a certai area, then the Travel Card/CBA may be used and the file must be completely documented)
 - Shuttle Service only when pre-paid prior to trip (not for individual ground transportation during a business trip such as taxi, bus, etc. without approval from the Office of State Travel)
- 3. The Travel Card/CBA must <u>not</u> be used for purchases valued at \$5,000 and over without prior approval from the Office of State Purchasing and Travel. [The College may allow a single purchase limit (SPL) on a College-wide or individual card basis up to \$5,000 without prior approval from the Office of State Travel. However, exceptions to this limit may be requested from the Office of State Travel on an Exception Form. The Office of State Travel must approve in writing any authority for an SPL or one time override above \$5,000.]
- 4. The Travel Card/CBA must <u>not</u> be used (regardless of dollar amount):
 - a. For personal use.
 - b. For incidentals.
 - c. To avoid appropriate purchasing or payment procedures.
 - d. To access cash or to acept cash in lieu of a credit to the Travel Card/CBA.
 - e. For gift cards and/or gift certificates, as they are considered cash and taxable, without prior approval by the Office of State Travel.
 - f. For purchase of alcohol, food or entertainment services without obtaining prior written approval from Office of State Purchasing and Travel.

- g. For fuel if the department/College is part of a Fuel Card and Maintenance Program. However, if the fuel program is not covered in a certain geographic area, then the Travel Card may be used and documentation of the transaction should be maintained indicating the reasons why a fuel card could not be used.
- h. For any other purchases deemed restricted in this policy, by the Controller's Office, or by the <u>State of Louisiana Liability Travel Card/CBA Policy</u>.
- i. Online accounts such as Amazon, PayPal, and etc., are not allowed.

C. Card Misuse

In accordance with the <u>State of Louisiana Liability Travel Card/CBA Policy</u>, card misuse includes fraud purchase and non-approved purchases, which are as follows:

1. **Fraud Purchase** – "any transaction, intentionally made that was not authorized by the cardholder or for Official State Business."

"An employee suspected of having misused the Travel Card/CBA with the intent to defraud the state will be subjected to an investigation. Should the investigation result in findings, which show that the actions of the employee have caused impairment to the state service, and should those findings be sufficient to support such action, the employee will be subject to disciplinary action. The nature of the disciplinary action will be the prerogative of the appointing authority and will be based on the investigation findings and the record of the employee. Any such investigation and ensuring action shall be reported to the Legislative Auditor and the Director of the Office of State Purchasing."

2. "Non-Approved Purchase – a purchase made by a State cardholder for which payment by the state is unapproved. A non-approved purchase differs from a fraud purchase in that it is a non-intentional misuse of the Travel Card/CBA with NO intent to deceive the agency for personal gain or for the personal gain of others.

Non-approved purchase is generally the result of a miscommunication between a supervisor or Approver and the cardholder. A non-approved purchase could occur when a cardholder mistakenly uses the Travel Card/CBA rather than a personal card.

When a non-approved purchase occurs, the cardholder should be counseled to use more care in handling of the Travel Card/CBA. The counseling should be in writing and maintained in the employee's file for no longer than one year unless another incident occurs. The employee should be made to pay for the item purchased inappropriately. After three instances of non-approved purchases or card misuse, the card will be suspended for one year. The specific steps for addressing card misuse are outlined in Section 10, *Travel Card/CBA Procedures*.

D. Sales Tax

- 1. Travel Card and CBA charges are a direct liability of the State; therefore, Louisiana state sales tax should not be charged on the card, especially for hotel, Enterprise in-state vehicle rentals and Park-N-Fly parking charges.
- 2. Cardholders should make every effort prior to transaction completion of informing the hotel, Enterprise in-state vehicle rental and Park-N-Fly parking to avoid being charged Louisiana State sales tax. The State of Louisiana tax exemption number is printed on the front of the Travel Card. Cardholder must complete and submit the <u>State of Louisiana Lodging Tax Exemption Form</u> to the hotel upon arrival. For vehicle rentals and shuttle services, Cardholder must complete and submit the <u>State of Louisiana Travel Expense Tax Exemption Form</u> to the vendor.
- 3. In the event state sales tax is charged and a credit is warranted, it will be the cardholder's responsibility to have the vendor-merchant (not Bank of America) issue a credit to the cardholder's account.
- 4. It is the cardholder's responsibility to ensure that state tax is not charged. Cardholders must make every effort at the time of purchase to avoid being charged Louisiana State sales tax, if in-state sales taxes are charged, it is the cardholder's responsibility to get a credit issued to their car, or the cardholder should be made to reimburse the agency the total amount of the state taxes. Documentation of attempts to obtain credit for any State Sales Tax charged in error must be maintained with documentation for the transaction where the tax was charged.
- 5. See current <u>State of Louisiana Travel Liability Card/CBA Policy</u> for state-related travel exemptions.

E. Convenience Fees

As per <u>Addendum #2 to the State of Louisiana Corporate Liability Travel Card and CBA</u> <u>Policy dated July 2018</u>, merchants may include a surcharge or convenience fee. VISA and MasterCard have strict merchant guidelines governing the assessment of surcharge fees:

- The merchant must register with VISA 30 days prior to beginning a surcharge policy.
- The merchant must provide clear disclosure to the customer.
- The amount of the surcharge must be listed as a separate item and detailed on the receipt.
- The surcharge must apply to all credit cards accepted by the merchant.
- The surcharge must be equivalent to the merchant's interchange rate, but cannot exceed 4%.

For any charge where the Supplier has charged a surcharge, a Cardholder or user should obtain a copy of the acknowledgement letter sent to the Supplier by Visa authorizing the Supplier to impose a surcharge as part of their supporting documentation.

Convenience Fees are charged as a flat fee (regardless of the total cost) when purchases are made via one form of payment channel over another - online or by phone vs. in store or by mail.

The decision to use a State Travel Card/CBA on a purchase that will incur a surcharge or convenience fee should be based on rare and extenuating circumstances such as no other form of payment is accepted, timeliness of payment to avoid late fees, urgency of the needed item or services, lack of other vendors, etc. The College is required to evaluate carefully the necessity of the State Travel Card/CBA transactions that are subject to surcharge or convenience fees.

Convenience Fee Approval Procedure

Convenience Fees should only be considered if it is deemed a necessary expense and the Program Administrator has had an opportunity to review the appropriateness of the fee prior to the transaction. Many suppliers charge fees that are not in compliance with Visa regulations and would therefore, not be an allowable charge. It is the responsibility, therefore, of the College to ensure that these fees are not only allowed by VISA regulations but also in the best interest of the State.

Prior to processing any transactions that include convenience fees, the Cardholder must determine if the convenience fee complies with VISA regulations and is in the best interest of the State. The Cardholder must consult with the Approver to discuss the appropriateness of the additional fee. The Cardholder must submit the request in writing justifying the need to make the purchase with their Travel Card. If approved by the Program Administrator, then the fee may be allowed.

F. Documentation

1. Complete Documentation

- Documentation must be adequate and sufficient to adhere to current PPM49, a. purchasing policies, rules, regulations, statutes, executive orders, State of Louisiana Liability Travel Card/CBA Policy for recording of expenditures in the State/Agency accounting system. All supporting documentation along with receipts are scanned and attached to each corresponding transaction. Immediate supervisors/approvers must verify and ensure that these controls are being met and that transactions are appropriate, accurate, have a business case and business need for all expenditures, all receipts and receipt's dates and other supporting documentation dates are applicable with known need or business travel, and approved. Documentation of approval must be accomplished by a signature on a paper Travel Card log or electronically online by signing off on the transaction. Approval by the approver certifies that the documentation is acceptable for each transaction, that it was for official state business, that it complies with appropriate rules and regulations, etc., as mentioned above and that it has been reviewed and is approved.
- b. Documentation is required for all purchases and credits. For items such as registrations, where the vendor does not normally generate a receipt a copy of the ordering document may be used. Acceptable documentation must include a line description with full description not a generic "general merchandise" and line item pricing for the purchase. Electronic receipts are allowed if they are un-editable.

- c. For internet purchases, the print out of the confirmation showing the details, or the printout of the transaction details, if it shows what was purchased, the quantity and the price paid suffice for the itemized receipts.
- d. In the WORKS Workflow online system, the cardholder is issued a unique login User ID number, along with a password. Immediate supervisors or designated approvers are to utilize their unique User ID and password to certify and electronically signoff on each transaction. Audit trails exist within the software with date and time stamps for sign-offs and approvals.
- e. The Cardholder approvers must forward all supporting documentation along with invoices, receipts, and signed paper or approved electronic log, by both cardholder and approver and signed statement, by both cardholder and approver, and any findings and justification to the agency's fiscal office for review and for maintenance of the files in accordance with record retention laws. This file must be centrally located in the agency's fiscal office and will be subject to periodic review by the Office of State Purchasing and Travel, the Legislative Auditors and any other duly authorized auditor.
- f. All system entries and scanned supporting documentation, when utilizing Workflow and electronic approvals are maintained electronically within the WORKS Workflow online system for up to 3 years. If an agency requires documentation retention for more than 3 years, it is the responsibility of the agency to obtain and archive the transaction data annually.

2. Individual Travel Cards

It will be each cardholder's responsibility to submit their travel expense form and all required transaction documentation (both paper and electronic in Workflow), special approvals, etc. timely and in accordance with this policy to help ensure it is paid timely by the State.

3. Controlled Billed Accounts (CBA)

Program Administrators for the CBA accounts will maintain records / approvals sufficient to reconcile the CBA statement to ensure it is paid timely by the State. Each CBA Program administrator, Cardholder, and approver is responsible for ensuring that documentation is adequate and sufficient to adhere to PPM49 guidelines, all rules, regulations, laws, statutes, policies and Accounting guidelines for recording of expenditures.

CBA cardholders must have an approver who is a supervisor at least one level higher than the CBA cardholder. CBA cardholders are to follow all individual cardholder procedures, trainings and certifications, rules, regulations, guidelines, as outlined in the <u>State of Louisiana Liability Travel Card/CBA Policy</u> and this policy, including forwarding signed log or approved electronic log, by both cardholder and approver, signed statement, by both cardholder and approver, and supporting documentation to agency's fiscal office for review and file maintenance.

6. General Requirements for Authorization of Cardholders

- A. The Supervisor/Budget Head must complete the required enrollment steps outlined in the procedures section of this policy for each prospective Cardholder under his/her jurisdiction. Only one card may be issued to each Cardholder.
- B. The Supervisor/Budget Head is responsible for assigning spending limits per transaction and per cycle, and limiting the number of transactions allowed for the card holder.
- C. The Supervisor/Budget Head is responsible for assigning a default Delgado budget account and object code approved by the appropriate Department Head. All purchases are charged to the default budget account and object code unless otherwise specified.
- D. Secondary approval must be obtained by the appropriate Vice Chancellor over the department or division.
- E. The Controller's Office is the final step for approval and processing.

7. Cardholder Responsibilities

A. General Responsibilities

- 1. The College's Travel Card/CBA is a corporate card/account and does not affect the Cardholder's personal credit. However, it is the Cardholder's responsibility to ensure that the Travel Card/CBA is used in accordance with the Travel Card/CBA Program guidelines and related College policy and procedures. Failure to comply may result in Travel Card/CBA account deactivation, permanent revocation of card, notification through the Cardholder's chain of command, internal audit and/or Campus Police for further investigation, or disciplinary actions that may include (depending upon the seriousness of the offense) reprimand, probation, suspension, demotion, or termination of employment, and/or criminal prosecution, as deemed appropriate.
- 2. The College retains the right to cancel a Cardholder's privileges. Cards may be revoked for card misuse or non-compliance with policies and procedures and/or Cardholder's Agreement.

B. Specific Responsibilities

- 1. Travel Card/CBA must be used for purchases as outlined in Section 5B, "Card Usage Guidelines."
- 2. The Cardholder is responsible for complying with the procedures and requirements as outlined in this policy.
- 3. Cardholder must obtain annual cardholder certification through the State's online certification training program in which a passing grade of at least 90 must be obtained.

- 4. In the event an unauthorized charge is placed on the individual's Travel Card/CBA account, the Cardholder must never make a payment directly to the bank. Instead the Cardholder must report any unauthorized charges to the Travel Card/CBA Program Administrator immediately. Procedures to address unauthorized purchases are outlined this policy.
- 5. Cardholder is required to make arrangements with Approver regarding how the periodic account reconcillation procedures, as outlined in Section 10, *Travel Card/CBA Procedures*, will be completed in case of the Cardholder's absence.
- 6. The Cardholder is responsible for obtaining original receipts/documentation for each purchase, as outlined in Section 5E, "Documentation."
- 7. The Cardholder is to maintain the required purchase information in the card issuer's electronic Travel Card/CBA log as outlined in Section 10, *Travel Card/CBA Procedures*.
- 8. The Cardholder must indicate acceptance of each transaction in the electronic Travel Card/CBA log when performing the required periodic account reconciliation steps as outlined in Section 10, *Travel Card/CBA Procedures*.
- 9. Upon completion of the periodic account reconcilation, the Cardholder is to present the information from the electronic Travel Card/CBA log and original receipts/documentation to Approver for approval within time period stated in Section 10, *Travel Card/CBA Procedures*.
- 10. Cardholder is responsible for ensuring receipt of services, and resolving any receiving discrepancies.
- 11. Cardholder is responsible for settling any disputes, clearing erroneous charges, and requesting charges and requesting credit for returned merchandise directly with the vendor. If the Cardholder is unable to reach an agreement with the vendor, he/she must complete the card issuer's required steps for documenting disputed items, which are outlined in Section 10, *Travel Card/CBA Procedures*.
- 12. Cardholder is responsible for the physical security and control of his/her card and its appropriate use, and therefore must:
 - Recognize that the Travel Card/CBA is the property of the State of Louisiana;
 - Never put the full Travel Card/CBA account number or Travel Card/CBA log User ID or passwords in emails, fax, reports, memos, etc., or display them in work area. If designation of an account is necessary, only use of the last four or eight digits of the account is to be allowed;
 - Never give the Travel Card/CBA account number, Travel Card/CBA log User ID or passwords to someone else.
 - Never leave work area while logged into the Travel Card/CBA log or leave log-in information lying in an unsecure area.

- Maintain security of card data such as the account number, the expiration date, and the card verification code (CVC), the 3-digit security code located on the back of the card; and
- Never send a copy of the Travel Card/CBA if requested by a merchant. If this is required by a merchant, then the Cardholder must use another form of payment other than the Travel Card/CBA.
- 13. If Cardholder notices a fraudulent purchase, he or she must report the purchase to the Travel Card/CBA Program Administrator.
- 14. The Travel Card/CBA is to remain the property of the card issuer. It MAY NOT be transferred, assigned to, or used by anyone other than the designated Cardholder. The Cardholder must surrender the Travel Card/CBA upon request to Delgado Community College or any authorized agent of the card issuer.
- 15. The Cardholder is responsible for notifying the CBA Program Administrator and, if appropriate, surrender Travel Card/CBA if any of the following occur:
 - -Employment has ended
 - -Furlough/layoff
 - -Transfer from department or budget unit
 - -Extended leave for more than 30 days including summer break
- 16. Cardholder MUST first report a lost or stolen card or fraudulent activity immediately to the card issuer, Bank of America at 1-888-449-2273, and then second must notify the Travel Card/CBA Program Administrator. The card issuer immediately cancels the Travel Card/CBA and forwards a replacement card within three (3) to five (5) business days.

8. Approver's Head Responsibilities

A. General Responsibilities

It is the Approver's responsibility to ensure that the Travel Card/CBA is used for appropriate business purposes in accordance with the Travel Card/CBA Program guidelines and related College policy and procedures. Failure to ensure Cardholder compliance with program guidelines may result in suspension of card privileges for department, permanent revocation of cards within the department, notification to management, internal audit and/or Campus Police for further investigation, or disciplinary measures that may include (depending upon the seriousness of the offense) reprimand, probation, suspension, demotion, or termination of employment, and /or criminal prosecution.

B. Specific Responsibilities

The Approver has the following responsibilities for ensuring proper use of the Travel Card/CBA:

- 1. Approve Travel Card/CBA privileges for employees who are responsible for making significant purchases on behalf of the department and who previously have demonstrated responsibility toward fiscal matters.
- 2. Complete required training prior to card being issued to any Cardholder in the department.
- 3. Obtain annual approver certification through the State's online certification training program in which a passing grade of at least 90 must be obtained.
- 4. Carefully review the information submitted in each Cardholder's electronic Travel Card/CBA in the Works System to verify legitimacy of each purchase and sufficiency of receipts/documentation.

- 5. Submit electronic approval in the Works System with all necessary documentation including complete line item descriptions where generic description is on receipts such as "general merchandise" (whether paper or electronic) within time period stated in <u>State of Louisiana Liability Travel Card/CBA Policy</u>.
- 6. Forward all original supporting documentation along with invoices, receipts, approved logs signed by both the Cardholder and the Approver, bank statements signed by both the Cardholder and the Approver, along with any findings and justifications to the Program Administrator, Office of the Legislative Auditors, and any other duly authorized auditor.
- 7. Ensure missing original receipts/documents according to the specific steps outlined in Section 10, *Travel Card/CBA Procedures*.
- 8. Ensure non-approved purchases are documented and addressed according to the specific steps outlined in Section 10, *Travel Card/CBA Procedures*.
- 9. Complete the required steps, as outlined in the <u>State of Louisiana Liability Travel</u> <u>Card/CBA Policy</u> to report any discrepancies, policy or procedure violations, and non-approved purchases or any other form of card misuse.
- 10. Complete the required reporting steps, as outlined in the <u>State of Louisiana</u> <u>Liability Travel Card/CBA Policy</u> for the following situations in which the Cardholder:
 - changes departments
 - has change in job responsibilities and is no longer required to have card privileges
 - is no longer employed with College
 - is on extended leave for more than 30 days including summer break
- 11. Annually review agency cardholders and cardholder limits, and ensure appropriate utilization and maintain file to document compliance with this requirement.
- 12. Understand that failure to properly fulfill responsibilities as a Travel Card/CBA approver could result, at a minimum, in the following: written counseling which would be placed in employee file for a minimum of 12 months; consultation with the Travel Card/CBA Program Administrator and possible other College officials; disciplinary actions, up to and including termination of employment; and/or legal actions, as allowed by the fullest extent of the law.

9. Travel Card/CBA Program Administrator's Responsibilities

The Travel Card/CBA Program Administrator must:

- 1. Maintain control over cards issued, Travel Card/CBA accounts suspended and accounts closed.
- 2. Keep Cardholders and Approvers up to date on program policy and procedures.

- 3. Provide annual training for Cardholders and Approvers. Educate cardholders/CBA Administrators on use of the sales tax requirements.
- 4. Ensure correct budget account allocation (includes the Fund, Organization, Account/Campus, and Program) are used for all purchases.
- 5. Process payments to card issuers within 25 days of statement dates via electronic fund transfer (EFT).
- 6. Monitor receipts/documentation for sales tax and other policy violations, and ensure corrective action is taken regarding repeat violations.
- 7. Report policy violations to Cardholder and Approver according to policy and/or procedures.
- 8. Monitor all original receipts/documentation on file in accordance with the College's retention requirements.
- 9. Conduct an audit of the Travel Card/CBA Program no less than once every three (3) years, as encouraged by the Office of State Travel, and upon initiating an audit notify and provide copies of all completed audits to the Office of State Travel.
- 10. Ensure that all audit reports required by the <u>State of Louisiana Liability Travel</u> <u>Card/CBA Policy</u> are run and reviewed on a monthly basis.

Works System Audit Reports:

• *Card/CBA Decline Report* – shows all transactions that were declined during a specified time period including the reason for the decline. Example of card/CBA declines include card/CBA may not have been activated, mcc group excluded, not enough money available, type of vendor not allowed, etc.

• *Card/CBA Status Report* – shows the status of each card by listing the cardholders name, profile, single transaction limit. You should be able to verify that each cardholder has been assigned the correct profile and all limits are correct.

• *Same Day/Same Vendor Report* – shows all transactions, which have occurred on the same day with the same vendor, by cardholder, which amounts total more than the cardholders single transaction limit set by the Agency.

Intellilink "Rules" Audit Reports:

• Activity in Closed/Suspended Accounts Report - transactions that occur in closed or suspended accounts (includes lost or stolen card accounts).

• *Airline Incidentals (Less than \$25, \$25, \$50, \$75 and \$100) Report -*Transactions with Airlines that potentially could be for incidentals and/or baggage fees, which are not allowed by State Policy. • *Hotel Incidentals Report*- transactions for potential hotel Incidentals that are not allowed in State Policy. Report captures purchases under \$50; however, report may not be complete, as not all hotel merchants report line item details.

• *Non-Contracted Car Rental Company Report* – transactions for noncontracted car rental companies to determine why cardholder is using car rental companies other than those on mandated contracts.

• *Single Transaction Exceeding \$5,000 Report* – transactions exceeding \$5,000 are not allowed in the State Policy without prior approval. Need to ensure proper approval was obtained from Office of State Travel to allow any of these purchases.

• *Allowed MCCs (Food and Alcohol) Report* – shows MCCs that may be opened but should be monitored with special attention to MCC groups 5813 and 5921. Includes food and alcohol Merchants/purchases; proper approval must be obtained from Office of State Travel to allow any of these purchases.

Additional Reports as Added Value for Compliance Monitoring:

• *Weekend Purchase Activity Report* –shows transactions that occurred on weekends (Saturday/Sunday).

• *Holiday Purchase Activity Report* –shows transactions that occurred on State holidays.

• *Premium Class Airfare Report* – shows airline tickets (including itinerary if available) based on any segment of travel being in a premium class service cabin. Premium class could be first class or business class.

• *Restricted MCCs Report* – shows transactions for Merchant Category Codes restricted by State Policy. Need to ensure proper approval was obtained from Office of State Travel to allow any of these purchases.

• *Fuel Purchases, High Grade Report* – shows purchases of High Grades of Fuel should be monitored to determine why the employee is purchasing this higher-grade fuel, instead of regular unleaded as advised and which is more cost effective.

• *Transactions from a Single Cardholder with a Single Vendor Report* – shows transactions where the cardholder is the only one transacting with a single merchant.

• *Premium Class Airfare Report* – shows transactions involving premium class airfare.

• *Fuel Type Summary Report* – shows fuel type summary by card account report.

• *Contracted Car Rental Company Report* – shows transactions for State-Contracted Car Rental Companies.

• *Spend by Top 50 Merchants Report* – shows transactions with Top 50 Merchants.

• *Spend Summary by MCC Report* – provides Spend Summary by Merchant Category Codes.

- 11. Monitor Cardholder/CBA accounts that are not active and adjust single transaction limits based on possible change in needs and cancellation of card, when not utilized in a twelve-month period. (A card/CBA may only remain active, if dormant for a twelve-month period, by justification and approval from the Office of State Travel. If approval is granted, the card/CBA must be suspended and profile changed to \$1 limit until future need for activation. An example of the need for a card/CBA that may be dormant for twelve months is that the card/CBA is being maintained only for emergency situations.)
- 12. Ensure all supporting documentation, including approval document(s), etc., are located in one central location available to auditors.
- 13. Ensure an annual review/audit of the College's Travel Card/CBA Program is conducted by the College's internal auditor or equivalent.
- 14. Ensure procedures and controls are in place for prompt payment, reconciliation and cost distribution of charges and credits, including monthly post-audits of Cardholder/CBA transactions and supporting documentation performed by the Travel Card/CBA Program Administrator to (1) monitor the number and dollar amount of purchases made, vendors used, and detailed transaction information to properly allocate the cost, and (2) verify that purchases are made in accordance with the <u>State of Louisiana Liability Travel Card/CBA Policy</u>, all current purchasing policies, purchasing rules and regulations, Louisiana Statutes, and Executive Orders.
- 15. Submit required monthly certifications to the Office of State Travel.

10. Travel Card/CBA Procedures

A. **Obtaining a Travel Card**

- 1. Cardholder completes a <u>Cardholder Enrollment Form (Form 3300/010)</u> and submits form to Supervisor/Budget Head for approval. *Name on card must match employee's name on record in the Office of Human Resources. Any subsequent name change requires a new form to be submitted.*
- 2. Supervisor/Budget Head reviews employee's purchasing duties for the department or division, and if warranted, approves Cardholder's Enrollment Form. If supervisor is not also the budget head then budget head must also approve. Approval on the form requires the Supervisor/Budget Head to:

- Set single transaction limit (must be less than \$5,000.00 including shipping and handling charges, excluding taxes)
- assign default budget and object code to be used
- appoint an Approver to manage, review, and approve the Cardholder's Travel Card/CBA transactions.
- 3. Supervisor/Budget Head forwards to the appropriate Vice Chancellor for approval.
- 4. Vice Chancellor:
 - reviews for accuracy and approves form
 - forwards to the Controller's Office for processing
- 5. Controller's Office:
 - reviews requests for signature approval by the Controller
 - forwards approved requests to Program Administrator
 - submits approved requests to card issuer and receives cards.
- 6. Cardholder:
 - is notified of approval and training is scheduled by Controller's Office.
 - receives copies of all relevant policies, procedures and guidelines.
 - completes the required online certification with a passing grade of 90% or above.
 - signs <u>State of Louisiana Travel Cardholder Agreement Form</u> verifying agreement to abide by all relevant policies, procedures and guidelines.
 - submits certification of training and Cardholder Agreement Form to Travel Card/CBA Program Administrator/Accounts Payable.
 - is provided with Travel Card/CBA and is authorized to use card immediately.
- 7. All Cardholders, Approvers, and the Travel Card/CBA Program Administrator must sign the most current State of Louisiana Travel Card/CBA Program Agreement Form for their applicable program roles *on an annual basis*, which verifies their agreement to abide by all relevant policies, procedures, and guidelines:

State of Louisiana Travel Cardholder Agreement Form

State of Louisiana Travel Card Approver Agreement Form

State of Louisiana Travel Program Administrator Agreement Form

B. "Works" System Purchase Request

- 1. The card CBA issuer, Bank of America, utilizes the "Works" system, a web-based program for Cardholders and Approvers to manage, review and approve Travel Card/CBA transactions.
- 2. An open, approved Purchase Request in the Works system is required before a card/CBA can be used to make a purchase. See "<u>Instructions on Entering Purchase</u> <u>Requests in Works System</u>."

- 3. Works Purchase Requests must be entered as needed for specific, travel purchases. Each request must include a vendor name.
- 4. Requests entered must have an expiration date of no later than June 30th of current fiscal year. All requests will be closed on June 30th.
- 5. Requests will be reviewed and approved (or adjusted or disallowed) by the Approver and Travel Card/CBA Program Administrator.

C. Travel Card Usage Guidelines

- 1. Cardholder is responsible for making purchases in accordance with *Card Usage Guidelines* as outlined in the <u>State of Louisiana Liability Travel Card/CBA Policy</u>.
- 2. Cardholder is encouraged to utilize existing state contracts and local vendors, when possible.
- 3. Split purchasing, which is the practice of artificially dividing a single purchase to avoid the Single Purchase Limit of \$5,000.00 is <u>not</u> allowed and is considered card misuse. See "Card Misuse" section of these procedures for disciplinary actions and/or sanctions regarding card misuse.
- 5. Cardholder is responsible for ensuring receipt of services and resolving any receiving discrepancies.
- 6. An ORIGINAL receipt or invoice and any supporting documentation are required for every card purchase. If an original receipt or invoice is lost, the <u>State of</u> <u>Louisiana Travel Card Missing Receipt Form</u> must be submitted.

D. Using the Card/CBA Account

On-Site Purchases

- 1. Cardholder must ask the vendor if the Travel Card/CBA will be accepted.
- 2. Cardholder must inform the vendor that the College is a state-tax exempt organization and provide the vendor with the exemption number assigned by the Louisiana Department of Revenue for all Travel Card/CBA purchases, which is embossed on the card itself.
- 3. Cardholder must make every effort prior to transaction completion of informing vendor to avoid being charged Louisiana State sales tax. Cardholder must complete and submit the <u>State of Louisiana Lodging Tax Exemption Form</u> to the hotel upon arrival. For vehicle rentals and shuttle services, Cardholder must complete and submit the <u>State of Louisiana Travel Expense Tax Exemption Form</u> to the vendor.
- 4. Cardholder must never allow a merchant to continue to swipe a card if it does not work the first swipe.

5. Cardholder obtains from vendor a receipt or invoice that *itemizes* the expenses charged to the account. Retain this documentation for matching transactions in the Bank of America Works system.

E. Purchase Reconciliation and Approval Process

Cardholder:

- 1. The primary responsibility for the reconciliation and approval process rests with the Cardholder.
- 2. The Cardholder will have electronic access to the Travel Card/CBA account's information provided by the card/CBA issuer and will be required to reconcile transactions in the Works system on a weekly basis.
- 3. Cardholder must obtain an ORIGINAL receipt and supporting documentation for every Travel card/CBA purchase. All receipts and supporting documentation must be scanned and tied to the applicable transaction in the Works system and not as one image for all transactions. They must be signed by both Cardholder and Approver, forwarded with signed log and signed bank statement to the Approver for approval and signatures and ultimately to the Travel Card/CBA Program Administrator/Accounts Payable for review and maintenance of centralized files.
- 4. If an original receipt is lost, the card/CBA issuer's <u>State of Louisiana Travel Card</u> <u>Missing Receipt Form</u> must be submitted to the Controller's Office.
- 5. All receipts must be scanned, signed by both Cardholder and Approver, and originals sent to the Travel Card/CBA Program Administrator.
- 6. The Cardholder is to review and verify purchase information in the Works system weekly.
 - Transactions must be "signed off" in the Works system within five (5) business days of purchase.
 - At the end of a statement period (the 5th of every month) all transactions posted as of the 5th must be "signed off on" by the 10th of the month.
- 7. Cardholder is to compare the transaction in the Works system with the actual sales receipts, invoices, and supporting documentation information referenced in the Works system.
- 8. Cardholder must certify agreement ("sign off") with the legitimacy and accuracy of the listed transactions in the Works system. This approval serves as certification by the Cardholder/CBA that all charges are accurate and valid College expenditures.
- 9. "Sign off" in the Works system requires the Cardholder/CBA to complete the following steps (see "Instructions on Signing-Off on Transactions in Works System"):

- Verify each transaction as to date, vendor, and amount by matching to the supporting documentation referenced in the Works system.
- Add a comment describing items purchased on General Tab.
- Complete budget account allocation (Fund, Organization, Account/Campus, Program) as applicable on the Allocation Tab.
- Attach purchase request.
- Upload receipts and documentation
- Sign off on transaction.
- Credit line is restored only after transactions are signed off in the Works system by Cardholder and Approver.
- 10. Cardholder is responsible for resolving any "flags" raised in the Works system within two weeks of the flag being raised.
- 11. Cardholder is responsible for ensuring receipt of services, and resolving any receiving discrepancies.
- 12. Cardholder is responsible for settling any disputes, clearing erroneous charges, and requesting charges and requesting credit for returned merchandise directly with the vendor.
- 13. Cardholder is to contact the vendor to resolve any outstanding issues. Most billing problems can be resolved expeditiously in this manner.
- 14. If Cardholder is unable to reach an agreement with the vendor, the card/CBA issuer's <u>Statement of Disputed Item</u> must be submitted to the Program Administrator/Accounts Payable. The card/CBA issuer must be notified in writing of any unresolved disputed item within sixty (60) days of the date of the transaction noted in the Works system.
- 15. Cardholder/CBA is to forward all supporting documentation for all transactions signed off to his/her Approver.
- 16. Cardholder/CBA is to reconcile transactions in the Works system and submit all supporting documentation to the Approver on a weekly basis.
- 17. Discrepancies, policy violations, or card/CBA misuse must be reported *immediately* to the Travel Card/CBA Program Administrator/Accounts Payable Office on the Travel Card/CBA Notification of Discrepancy/Violation Form (Form 3300/018).

Approver:

1. Approver is to verify that the transactions in the Works system match the actual sales receipts or invoices (supporting documentation referenced in the Works system) and to ensure proper documentation as required as described in this policy.

- 2. Approver must certify agreement with the legitimacy and accuracy of the listed transactions in the Works system. This approval serves as certification by the Approver that all charges are accurate and valid College expenditures.
- 3. For disputed purchases or purchases without proper receipts or documentation, Approver must ensure the card/CBA issuer's <u>Statement of Disputed Item Form</u> and/or a <u>State of Louisiana Travel Card Missing Receipt Form</u>, if applicable, are submitted to the Travel Card/CBA Program Administrator/Accounts Payable Office on a biweekly basis.
- 5. Discrepancies, policy violations, or card/CBA misuse must be reported *immediately* to the Travel Card/CBA Program Administrator/Accounts Payable on the <u>Travel</u> <u>Card/CBA Notification of Discrepancy/Violation Form (Form 3300/018).</u>
- 6. Approver must (1) complete and *immediately* submit a <u>Travel Card/CBA Action</u> <u>Form, Form 3300/013</u> and (2) complete an exit review with Cardholder regarding the Cardholder's transactions, receipts, supporting documentation and bank statements, as well as obtaining necessary signatures prior to departure, for the following situations in which the Cardholder:
 - changes departments
 - has change in job responsibilities and is no longer required to have Card/CBA privileges
 - is no longer employed with College
 - is on extended leave for more than 30 days including summer break
- 7. After ensuring all receipts and supporting documentation are scanned and tied to the applicable transaction in the Works system, the Approver must forward all original supporting documentation along with invoices, receipts, approved logs signed by both the Cardholder and the Approver, along with any findings and justifications to the Travel Card/CBA Program Administrator/Accounts Payable for maintenance in accordance with the College's record retention requirements and subject to periodic review by the Travel Card/CBA Program Administrator, Office of the Legislative Auditors, and any other duly authorized auditor. Hard copy receipts and other original supporting documentation of purchases must NOT be sent to the Controller's Office unless requested.
- 8. The following forms must be submitted within the timeframe described above for each:
 - <u>State of Louisiana Travel Card Missing Receipt Form</u>
 - <u>State of Louisiana Travel Card/CBA Issuer's Statement of Disputed Item</u>
 - Travel Card/CBA Action Form (Form 3300/016)
 - <u>Travel Card/CBA Unauthorized Purchase Form (Form 3300/017)</u>
 - <u>Travel Card/CBA Notification of Discrepancy/Violation Form (Form</u> 3300/018)

F. Questionable Purchases

In accordance with *Card Usage Guidelines*, purchases must be deemed necessary and required for continued daily operations of the College. The Travel Card/CBA Program Administrator reserves the right to request justification for questionable purchases. Questionable purchases include any Travel Card/CBA transaction that meets the following criteria:

- There is no clear business use for items or services purchased or use not congruent with department's mission;
- The cost seems excessive for the item;
- The quantity of items purchased seems excessive; and/or
- The timing of the purchase seems inappropriate.

The Travel Card/CBA Program Administrator will review all transaction for questionable activity on a monthly basis.

If purchase is determined to be unauthorized, the appropriate procedures for improper use of card are to be followed.

G. Improper Use of Travel Card/CBA

Improper use of the Travel Card/CBA is divided into two categories depending on severity, (1) violations of policy/procedures and (2) card/CBA misuse, and must be reported to the Travel Card/CBA Program Administrator on the <u>Travel Card/CBA</u> <u>Notification of Discrepancy/Violation Form (Form 3300/018)</u>.

Violations of Policy/Procedures

- 1. A policy/procedure violation consists of any action taken (or not taken), which violates College or State policy/procedure with the exception of actions specifically considered card/CBA misuse in accordance with the <u>State of Louisiana Travel</u> <u>Card/CBA Policy</u>.
- 2. Some examples of policy/procedure violations include late submittal of documents, incomplete submittal of documents, failure to maintain original receipts/documentation on file, failure to notify the Travel Card/CBA Program Administrator of extended absences, and allowing state sales taxes to be charged on purchases. (Note: Evidence documenting that the Cardholder's attempt to get state sales tax exempted and/or credited alleviates the Cardholder from a Louisiana sales tax charge violation.)
- 3. Policy/procedure violations will be tracked by the Travel Card/CBA Program Administrator.
- 4. After three (3) violations in a 12-month period, the Cardholder/CBA and his/her Approver and Supervisor/Budget Head will be notified, in writing, of the nature and dates of the violations.
- 5. Any additional violations occurring in a 12-month period will be considered misuse of card/CBA and procedures for card/CBA misuse will be applied.

Card/CBA Misuse

Excessive Policy and Procedure Violations/ Non-Approved Purchases

- 1. Cardholders must comply with the requirements regarding Card/CBA Misuse in accordance with the <u>State of Louisiana Liability Travel Card/CBA Policy</u>. Card/CBA misuse includes but is not limited to the following:
 - excessive policy/procedure violations
 - split purchasing (the artificial dividing of a single purchase to avoid the single purchase limit) as per <u>State Purchasing Policy</u> and <u>Executive Order</u> <u>"Small Purchases Procedures</u>"
 - intentionally or non-intentionally making personal and/or non-approved purchases
 - making non-approved purchases due to a miscommunication between Supervisor/Budget Head (or Approver) and Cardholder and other instances of improper use
 - a non-approved purchase could occur when the Cardholder mistakenly uses the Travel Card/CBA rather than a personal card
- 2. Cardholders are personally responsible for unauthorized purchases. In the event an unauthorized charge is placed on the individual's Travel Card, the Cardholder must never make a payment directly to the bank. Instead the Cardholder must report any unauthorized charges to the Travel Card/CBA Program Administrator immediately. The Cardholder may immediately return the merchandise and pay applicable restocking and related fees, or reimburse the College for the purchase by check or money order submitted to the Controller's Office prior to the second payday after the violation is noted.
- 3. In accordance with the <u>State of Louisiana Liability Travel Card/CBA Policy</u>, "a nonapproved purchase differs from a fraud purchase in that it is a non-intentional misuse of the Travel Card/CBA with NO intent to deceive that agency for personal gain or for the personal gain of others." For any non-approved purchases, the Cardholder must submit an <u>Unauthorized Purchase Form (Form 3300/014)</u> to document the circumstances surrounding the purchase. If the Cardholder does not submit the form, then the Approver must submit the form. Properly justified occurrences will be taken into consideration.
- 4. After one instance of card/CBA misuse, the Cardholder and his/her Approver will be notified, in writing, of the nature and dates of the violations. When a non-approved purchase occurs, the Cardholder will be counseled to use more care in handling of the Travel Card/CBA. The counseling will be documented in writing and will be maintained in the Travel Card/CBA Program Administrator's file.

- 5. After three instances of card/CBA misuse in a 12-month period:
 - the card/CBA will be immediately suspended for one year, and
 - Cardholder/CBA and Approver will be notified in writing.
 - the facts will be presented to an internal committee that will determine if the card/CBA will be reinstated, suspended for a set period, or revoked.

Fraud Purchase

- 1. In accordance with the <u>State of Louisiana Liability Travel Card/CBA Policy</u>, a fraud purchase is any use of the Travel Card/CBA that is determined to be an intentional attempt to defraud the state for personal gain or for the personal gain of others. Fraud purchases include but are not limited to the following:
 - intentionally violating policies and procedures for personal gain or gain of others
 - theft of identity or card/CBA information
 - use of the card/CBA to make fraud purchases by the Cardholder/CBA Administrator for personal gain or the gain of others
 - any other action regarding the card/CBA for personal gain or the gain of others
- 2. A suspected fraud purchase will result in immediate suspension of Travel Card/CBA privileges.
- 3. Cardholder/CBA, Approver and Supervisor/Budget Head will be notified in writing and asked to provide facts regarding the purchase.
- 4. The facts will be reviewed by the Travel Card/CBA Program Administrator, and the Controller's Office.
- 5. The Travel Card Program Administrator will determine if enough evidence of a fraud purchase exists to submit the case to the Human Resource Office for referral to internal audit and/or Campus Police for further investigation, if deemed appropriate.
- 6. If an investigation is conducted, the Travel Card /CBA will remain suspended until investigation is complete.
- 7. The Cardholder will be notified of the results of the investigation in writing.
- 8. If no fraud purchase is found, but a non-approved purchase is suspected, it will be treated as a non-approved purchase.

9. In accordance with the <u>State of Louisiana Liability Travel Card/CBA Policy</u>, should the investigation result in findings that show that the actions of the employee has caused an impairment to the state service, and should those findings be sufficient to support such action, the employee will be subject to disciplinary action. The nature of the disciplinary action will be based on the investigation findings and the record of the employee. Any such investigation and ensuing action shall be reported to the Legislative Auditor and the Director of the Office of State Purchasing.

H. Emergency Travel Procedures

In accordance with Office of State Purchasing regulations, an emergency condition is defined as "a threat to public health, welfare, safety, or public property." Immediately upon the Vice Chancellor for Business and Administrative Affairs' determination of a potential or declared state emergency, all travel requests will be suspended and disapproved. Emergency travel may be authorized only upon recommendation by the Vice Chancellor for Business and Administrative Affairs and upon approval by the Chancellor.

Once the state of emergency has cleared, the College's Travel Card/CBA Administrator is responsible for carrying out the Vice Chancellor for Business and Administrative Affairs directive as to when and to what extent post-emergency travel may be approved.

Form Attachments:

State of Louisiana Travel Cardholder Agreement Form
State of Louisiana Travel Card Approver Agreement Form
State of Louisiana Travel Program Administrator Agreement Form
State of Louisiana Travel Card Missing Receipt Form
State of Louisiana Travel Card/CBA Issuer's Statement of Disputed Item
Travel Card/CBA Action Form (Form 3300/016)
Travel Card/CBA Unauthorized Purchase Form (Form 3300/017)
Travel Card/CBA Notification of Discrepancy/Violation Form (Form 3300/018)
State of Louisiana Lodging Tax Exemption Form
State of Louisiana Travel Expense Tax Exemption Form

Delgado Policy and Procedures Memorandum, <u>Professional Leave and Travel Policy</u>
Delgado Policy and Procedures Memorandum, <u>Contracts for Professional, Personal, Consulting and Social Services</u>
Louisiana Community and Technical College System Policy #5.018, <u>LCTCS Policy for LaCarte Purchasing Card and CBA Policy</u>
<u>State of Louisiana Liability Travel Card/CBA Policy</u>
<u>PPM 49 – State of Louisiana General Travel Regulations</u>
<u>State of Louisiana Office of State Purchasing</u> Guidelines
<u>Executive Order "Small Purchases Procedures"</u>
Louisiana Revised Statute 39, Louisiana Procurement Code

Reviewed by:	Ad Hoc Travel Card/CBA Policy Committee 9/26/14
Approval:	Vice Chancellor for Business and Administrative Affairs 9/26/14
Procedural Update:	 State Regulations Update Approved by Vice Chancellor for Business and Administrative Affairs 10/30/14 State Regulations Update Approved by Vice Chancellor for Business and Administrative Affairs 1/18/17 State Regulations Update Approved by Vice Chancellor for Business and Administrative Affairs 9/21/18