

## P-Card Post Review Program and Policy Statement

### Program

The PSU Procurement Card Post Review Program and Policy Statement sets forth campus-wide standards for a procurement card post transaction review program in accordance with the Oregon University System (OUS) Fiscal Policy Manual Statement Procurement: Purchasing – Procurement Card 70.100 – 70.710. <http://www.ous.edu/cont-div/fpm/proc.70.100.php>. This program and policy statement should be used in conjunction with the campus procurement card program policies and guidelines as outlined in the Portland State University (PSU) Visa Procurement & Group Team Travel Cards User Guide.

[http://www.pdx.edu/sites/www.pdx.edu.bao/files/BAO\\_visa\\_procurement\\_card\\_user\\_guide.pdf](http://www.pdx.edu/sites/www.pdx.edu.bao/files/BAO_visa_procurement_card_user_guide.pdf) The procurement card program is administered at PSU by Specialized Accounting unit of Business Affairs Office and overseen by the Associate Manager of Specialized Accounting. The Associate Manager of Specialized Accounting will serve the role of the Program Administrator. The Program Administrator will establish and maintain a monitoring program that ensures the following:

- Expenditures charged through the Program are appropriate and within policy
- Complete and proper documentation supporting card charges are retained
- Use of each card is by authorized card users
- Fraudulent activity is identified and minimized
- Monthly reconciliations are performed as required
- Distribution of procurement card expenditures to appropriate account codes with proper documentation and text.

Additionally, the Program Administrator or Program Coordinator/designee will be responsible for monitoring the Procurement Card Program and departmental transactions to ensure that:

- All Budget Authorities, Business Managers, Card Custodians, and Card Users have completed the required training, including the OUS procurement card policy knowledge test <https://secure.ous.edu/cont-div/procurement/> and complete ongoing training when changes in System and/or changes in campus policy.
- Transactions are processed in a timely manner
- Monthly bank statements are reconciled directly with Banner transaction feeds from the bank
- Verify that there are no prohibited transactions; including non-business and/or personal transactions
- Departments are reporting questionable transactions to both the Budget Authority and Program Administrator in a timely manner
- The Budget Authorities are reviewing all procurement card charges for appropriateness as well as reviewing and signing of the monthly log reconciliation and statements
- Departments are maintaining a card usage log for multi-user cards

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- All cards and card numbers are appropriately safeguarded
- Annual review of card usage frequency
- Annual review of card activity spending levels

### ***Card Review***

In accordance with the OUS Fiscal Policy and PSU post transaction review policy, the Program Administrator and/or designee(s) will conduct unannounced and announced procurement card reviews throughout the year. The Program Administrator or designee(s) may audit one or more cards assigned to the department, inclusive of group travel and fuel cards. Unannounced reviews may be planned by management at any point in time throughout the year. Reviews may be conducted if there is evidence or reports of fraudulent activity, questionable activity, or prohibited transactions. Procurement Card reviews will provide an opportunity to answer departmental questions and review policy. The intent of the PSU audit plan is to review each procurement card in each department at least annually.

Each review will consist of the following items:

- Security of card
- Current signature sheet
- Card Log review
- Reconciliation of receipts to statements
- Required signatures on logs and statements
- Unauthorized or fraudulent charges
- All authorized users, Custodian, Business Manager and Budget Authority trained and passed p-card test

All findings will be documented using the PSU Procurement Card Department Audit Checklist. Each review will conclude with the Program Administrator and/or designee(s) meeting with the Card Custodian and Budget Authority (if deemed necessary) to review findings and answer any questions. Any follow up actions and time lines will be identified and a follow-up review may be required.

A memorandum, via email, summarizing any findings and results will be prepared with copies to the Card Custodian, Budget Authority and/or Dean, Purchasing and Contracts Manager, as well as, Business Affairs management and the Associate Vice President of Finance and Administration. Any recommendations for improvement to internal control will be noted in the memo.

In addition, Research and Strategic Partnerships will conduct post audit reviews of transactions posted to sponsored projects through the Banner P-Card module. Research and Strategic Partnerships will review the transactions for allowability on individual sponsored projects and adherence to Cost Accounting Standards in general. Research and Strategic Partnerships staff will run audit reports on a monthly basis  
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for particular account codes. A high level review will be conducted for expressly unallowable costs and high risk purchases that are frequently unallowable charges on grants. The high level review will also monitor expenditures for exceptions to the Cost Accounting Standards requirement of consistent treatment of costs. The audit reports will be distributed to Research and Strategic Partnerships staff assigned to individual awards who will review the transactions for compliance with individual award terms and conditions, budget availability, and sponsoring agency policy. Research and Strategic Partnerships staff will contact departments to obtain backup documentation and/or justification for individual transactions as needed. On a periodic basis, Research and Strategic Partnerships may conduct a post-audit review of cards that are associated exclusively with sponsored projects or may contact Specialized Accounting Services for information relating to audit reports performed by that unit.

### ***Transaction Review***

The Card Custodian is responsible for the timely distribution of charges to the appropriate account codes through the Banner P-Card module; which feeds nightly. If a transactions if left undistributed an email notification will be sent to the Card Custodian. The Program Administrator will monitor all undistributed transactions and will determine if notification to the Budget Authority is necessary. A meeting may be requested at the discretion of the Program Administrator or the Manager of Specialized Accounting Services if transactions are not distributed timely. Repeated failure to post transactions in a timely manner may result in the card being suspended or revoked.

### ***Exceptions***

All exceptions must be submitted in writing via email to the P-Card Administrator in Specialized Accounting Services. In the rare case that an exception is granted, it must be documented in writing with the appropriate approvals; which depending on the exception may require the Vice President of Finance or Administration or designee in accordance with the OUS policy .340.

### ***Financial Irregularities***

All employees of Portland State University are expected to report known or suspected financial irregularities within their responsible unit at the time they become aware of the incident. Any financial Irregularity (as defined by policy) discovered through the procurement card review process will be reported to the “Institutional Designated Administrator” in accordance to the PSU Financial Irregularity Policy Statement and the OUS Financial Irregularity Policy.

[http://www.pdx.edu/sites/www.pdx.edu.fadm/files/media\\_assets/Fiscal%20Irregularity%20Policy.pdf](http://www.pdx.edu/sites/www.pdx.edu.fadm/files/media_assets/Fiscal%20Irregularity%20Policy.pdf)