

Procedural Information

Liberty University Purchasing Card Violation Procedures

This document establishes procedures for oversight, management controls, and escalation measures for fraud, misuse, and/or mismanagement occurrences of the University P-Card.

Audit. Transactions incurred on the P-Card are subject to review by the P-Card Program Coordinator, Financial Planning and Budgeting, internal and external auditors, and other University groups as appropriate.

Violation Discovery. Any transaction or activity appearing to fall outside University policy must be reported to the Cardholder's Approver and/or P-Card Program Coordinator as noted:

- **Cardholder Discovery.** A Cardholder who discovers a self-incurred violation must report the violation to the Cardholder's Approver.
- **Reviewer/Approver Discovery.** Approvers who discover or are made aware of a policy violation incurred by a Cardholder must notify the P-Card Program Coordinator of the violation. P-Card Program Coordinator contact information: pcard@liberty.edu.
- **Third Party Discovery.** Anyone who discovers or is made aware of a policy violation committed by a Cardholder, Reviewer/Approver must notify the P-Card Program Coordinator.

Investigation. When notified of a violation, a P-Card Program Coordinator will contact the Cardholder and the Cardholder's Approver by email. The Cardholder may be asked to provide a detailed explanation and documentation to justify the purchase or action.

Review. A P-Card approver will present all documentation to the P-Card Program Coordinator for review, who will review the circumstances and documentation surrounding the alleged violation. After review, the Chief Procurement Administrator will determine the appropriate course of action based upon the severity of the violation, the number of previous violations incurred by the offender, any corrective action already taken, and/or other factors deemed as relevant.

Notification. The offender and the P-Card Review/Approver will receive written notification detailing the violation and the determined corrective/punitive course(s) of action.

Personal and Other Purchases Requiring Reimbursement to Liberty University:

Use of the P-Card for personal or non-University business transactions must be reported to the P-Card Program Coordinator (pcard@liberty.edu) within five (5) business days of the date the purchase was discovered. Cardholders must ask the vendor to reverse the transaction and credit the amount back to the P-Card. Cardholders must reconcile both the charge and credit in the University expense management system (Infor).

If the vendor is unable or unwilling to reverse the transaction, the Cardholder will receive a notification for the amount of the personal transaction(s). The Cardholder must submit the notification with full payment to the Cashier's Office (in the Student Service Center in Green Hall) within five (5) business days of the invoice date.

Failure to report personal purchases within five (5) business days of the date the purchase was discovered or failure to reimburse the University for personal purchases within five (5) days of the reconciliation date for the expense report containing the personal purchases may result in immediate P-Card suspension or revocation, Cardholder employment termination, and/or criminal prosecution.

Timely Reconciliation of P-Card Purchases. P-Card Transactions must be reconciled and approved by the end of the 7th calendar day of the following month, in Infor, with all required documentation. Consistent late reconciliation over 30 days or more, or missing documentation, will be considered a violation of policy and subject to corrective/ punitive actions by the University.

Corrective/Punitive Courses of Action

The following Corrective/Punitive courses of action will be enforced by the P-Card Program Coordinator. Division leaders should also use this section as a guideline for appropriate actions if violations are discovered at the departmental level.

Disciplinary action can be taken on Cardholders, Reviewers/Approvers, Reconcilers or any other individual performing the violation. The action taken is dependent on the severity of the violation, the number of previous violations incurred by the offender, corrective action previously imposed, and any other factors deemed as relevant.

Liberty University reserves the right to forgo any of these steps at any time if deemed necessary by University Officials.

Written Warning: Offender receives an email notification, detailing the transactions and/or activities in violation of P-Card Policy, including a warning to abstain from any further transactions or activities of the same nature;

Mandatory Retraining: Offender attends Finance 100, P-Card Travel Training, and/or P-Card General Training as directed.

Temporary P-Card suspension: The P-Card of the offender is suspended for a specified period of time up to 90 days, depending on the severity of the violation. The offender must attend Mandatory Retraining as defined above before his or her P-Card is reactivated.

Permanent P-Card Revocation: The P-Card of the offender is permanently revoked, and all future requests for P-Card privileges are denied.

Employment Termination: Human Resources is notified of the violation and the offender is terminated from employment with Liberty University.

Criminal Prosecution: Local police authorities are notified of the violation.

Sanctions

None additional

Exceptions

P-Card Reviewers/Approvers have the right to appeal in writing any decision made by the Chief Procurement Administrator to the Chief Financial Officer.

Date Approved

2/2/2023

Date for Review

2/2/2024