

Policy #	Policy Name	BOR Resolution	Adoption Date
3-10	CSCU Purchasing Card Policy		2025-02-27

Policy Owner(s):

CSCU System Chief Financial Officer; Institutional Chief Financial Officers; System and Institutional Procurement Leads; CSCU System Chief Compliance Officer

Applicability:

This policy applies to all employees including administrators, staff, and faculty at all institutions within the CSCU system. Additionally, the policy applies to any other individuals assigned, or in possession of, a CSCU-issued purchasing card.

Effective Date: April 1, 2025

I. Purpose

This policy sets clear guidelines on how purchasing cards (P-Cards) can and cannot be used to make sure resources are used wisely and efficiently to support quality education at the lowest possible cost. It outlines spending limits, responsibilities, and rules to ensure transparency and accountability. CSCU, in collaboration with member institutions, may also set stricter rules or add extra safeguards as needed to manage their budgets effectively.

II. Definitions

Business Meals: Meals provided to CSCU guests such as job candidates, visiting scholars, or donors or as an essential or important part of a conference or workshop conducted by CSCU institutions furthering the business or mission. Business meals involving faculty, staff or students, including group meals, should have a business purpose such as multiple departments for a substantial meeting or when stopping the meeting to allow time for a meal would be disruptive or inconvenient.

Cardholder: The individual named on the issued P-Card, or the individual assigned to assume responsibility for any purchases on a department card.

Department Card: A P-Card issued under a department's name for use by the department. Department Cards must have a Cardholder assigned to assume all responsibilities in this policy and associated policies, e.g. travel.

Entertainment: Tickets for events for the entertainment of institutional donors, alumni, guests, and visitors. In all cases, the expenses must be shown to benefit the mission of the institution or directly support its programs.

Individual User: Cardholder with routine responsibility to make purchases in accordance with their position/role within the institution or for a single department.

P-Card Administrator: Individual(s) responsible for administering CSCU P-Card programs.

Purchase: Buying business meals, commodities, or services strictly related to CSCU business, including travel.

Purchasing Card (“P-Card”): A commercial credit card intended as a CSCU procurement tool for approved business meals, commodities, and services directly from vendors at a cost below a specified dollar amount and within all other limits of this policy.

Purchasing Card Log Transactional P-card data set which includes cardholder name, department, billing cycle date, date of purchase, vendor name, description of purchase (including business justification), amount of purchase, account code, returned/credited/disputed item status, cardholder acknowledgement and date, reviewer acknowledgement and date, total dollar amount, and any other data required by the Procurement Lead.

Purchasing Staff: Cardholders with routine responsibility to make purchases for the system or a constituent unit.

Procurement Lead: Individual(s) with ultimate authority over an institution or system procurement department or program.

Split Purchase: A purchase transaction that is staged or divided into multiple transactions that would otherwise exceed either the dollar limit or item limit applicable to an authorized cardholder.

Sum of Items: The expenditure limit of items purchased in a single transaction based on the limits established by tier or level and whether the cardholder is Purchasing Staff or Individual User.

III. Policy

P-Cards may be used solely for official CSCU business and within approved amounts (limits) and for items or services consistent with the following general provisions, prohibited, and acceptable uses and purchases:

a. General Provisions

- i. P-Cards must be approved by the appropriate appointing authority, including the Chair of the Board of Regents, the system Chancellor, CSCU Presidents, or their designees.
- ii. P-Cards may only be used by the named cardholder or authorized department card user.

- iii. P-Card purchases must adhere to cost and item limits based on daily and monthly transactions established for the Department or Individual User, unless an exception is granted with sufficient approval and documented justification as outlined below.
- iv. As a state agency CSCU Institutions are tax exempt in Connecticut. Every effort should be made to remove sales tax prior to processing on the card. If sales tax is processed a documented effort should be made to reclaim if the tax amount exceeds \$1.
- v. Business meals are allowed under the circumstances outlined in this policy. When using the P-Card for business meals, the cardholder must obtain an itemized bill from the vendor and record the names of the attendees. Tips are allowed but must be limited to 20% of the total bill.
- vi. P-Card use is prohibited during sabbatical leave.

b. Prohibited Use

The following P-Card purchases are prohibited:

- Alcoholic beverages
- Entertainment related expenses unless explicitly listed in section *C Acceptable Use*
- Cash advances of any type
- Cellular phones and related monthly charges
- Clothing except as educational supplies, as permitted in section *C Acceptable Use*
- Construction and renovation services
- Debit cards and Gift cards used like cash (e.g. Visa money card, vendor cards) unless explicitly listed in section *C Acceptable Use*
- Equipment and furnishings costing over \$5,000 and/or that qualify as a controllable purchase as defined in the Capital & Controllable Asset Manual.
- Fine arts
- Firearms
- Food, beverages consumed at vendor's location (e.g. restaurants and bars) unless explicitly listed in section *C Acceptable Use*
- Food, catering or restaurant take-out for CSCU employees unless explicitly listed in section *C Acceptable Use*
- Gasoline except in the case of pre-authorized out-of-state travel using a state vehicle
- Gasoline for in-state rental vehicles
- Gifts/donations unless explicitly listed in section *C Acceptable Use*
- Internet service providers
- Monthly recurring expenses
- Moving services
- Personal use items (attaches, folios, pen/pencil sets etc.)
- Precious metals

- Prescription drugs and controlled substances
- Radioactive materials except as educational supplies, as permitted in section C *Acceptable Use*
- Reimbursements of any type
- Tobacco or cannabis products
- Travel Meals where a “per diem” is provided
- Split purchases for the purpose of circumventing transaction limits

c. Acceptable Use

The following purchases are generally acceptable in conformity with all other provisions of this policy:

- Advertising, promotional, or public relations items with appropriate review and approval consistent with college/system mission
- Awards, gift cards, and prizes properly authorized and pre-approved by the appropriate P-Card Administrator
- Books and periodicals
- Dues and professional memberships (business, technical, professional, and institutional memberships only)
- Educational experiences (events, museums, field trips)
- Emergency student needs
- Equipment and furnishings under \$5,000 and/or that do not qualify as a controllable purchase as defined in the Capital & Controllable Asset Manual.
- Event related expenses, including but not limited to
 - o Food or catering for official CSCU-sponsored meetings, events and functions (business meals)
 - o Participation by CSCU officials in their official capacity in externally sponsored public, community, or business events
- Gasoline for State vehicles for pre-authorized out-of-state travel (as included in an approved Travel Authorization)
- Graduation event expenses, including food, catering, and entertainment
- Hardware supplies
- Library books
- Maintenance supplies
- Postage and shipping
- Rentals of any type
- Repair parts and materials
- Social and cultural activities (including related food/catering and entertainment expenses) sponsored by CSCU as part of its mission

- Software only when it does not house confidential data and will be installed on CSCU owned equipment and was approved by IT Protocol process, if applicable.
- Computer supplies and non-controllable computer equipment
- Subscriptions (departmental use only)
- Office, laboratory, and educational supplies
- Tools, fixtures, and miscellaneous apparatus

d. Limits

i. Maximum Individual and Authorized User Limits

Category	Limit
Business Meal (per person excluding any associated tips)	\$50
Single Purchase Item	\$2,500
Single Purchase Sum of Items	\$5,000
Multiple Travelers transaction	\$5,000
Monthly	\$10,000
Number of Daily Transactions	10
Number of Monthly Transactions	100

ii. Maximum Purchasing Staff Limits

Category	Limit
Business Meal (per person excluding any associated tips)	\$50
Single Purchase Item	\$10,000
Single Purchase Sum of Items	\$50,000
Multiple Travelers transaction	\$50,000
Monthly	\$100,000
Number of Daily Transactions	20
Number of Monthly Transactions	200

In consultation with each CSCU institution the P-Card administrator shall within the above maximum limits establish not less than three (3) tiers with purchasing limits below the maximum and in accordance purchase history, roles and responsibilities, and other business necessity considerations.

iii. Emergency and Superuser Cards

Institutions may issue up to five (5) emergency cards with established limits not exceeding \$250,000 unless approved by the State Comptroller. Emergency cards are to be used for emergency purchases when the Governor declares a state of emergency

and may be used for any purchases typically executed via a purchase order or direct pay.

Institutions may also issue up to five (5) superuser cards to senior leadership for the purpose of executing transactions under emergent circumstances. Any purchase made with a superuser card must be reviewed and reconciled by someone other than the cardholder. The emergent circumstances and the justification for use of the purchasing authority must be documented to the CFO concurrent with the purchase or other transaction. Nothing in this policy exempts a superuser Cardholder from personal liability for misuse described below.

iv. Exceptions

Under extraordinary or emergent circumstances or where there are legitimate documented business needs and justifications, exceptions may be approved by the designated P-Card Administrator in consultation with appropriate leadership/reporting relationship (Chair Board of Regents, CSCU Chancellor, CSCU Presidents, Campus CEOs, Chief Financial Officers, or Procurement Leads). In general, exceptions should be approved prior to the purchase and must be approved by an authorized individual other than the cardholder. Exceptions must be documented with appropriate justification.

e. Standard Responsibilities

All institution P-Card procedures must be consistent with the following responsibilities:

Cardholder or Authorized User Responsibilities

The Cardholder or Authorized User is responsible for:

1. Adhering to the provisions in this policy and any related procedures.
2. Completing a Purchasing Card Application Form.
3. Obtaining required pre-approvals from the P-Card administrator or appropriate campus leadership for the following categories of purchases:
 - a. Purchases requiring a contract or agreement
 - b. Gift Cards
 - c. Streaming services
 - d. Business Meals as part of an on-campus event
4. Assuming responsibility for all purchases made with the card and for making such purchases in accordance with applicable policies and procedures and in agreement with the limits imposed on the application/cardholder agreement.
5. Using the P-Card for CSCU business and approved items only.
6. Maintaining and reviewing all purchases on the Purchasing Card Log and retaining all supporting documentation (proper receipts, vendor order form, cash receipts, etc.).
7. Attending the mandatory training session(s).

8. Verifying receipt of goods and following up with the vendor to resolve disputes and delivery problems, and arranging for returns, credits, etc.
9. Reporting lost or stolen card immediately.
10. Safeguarding card security at all times.
11. Payment of any prohibited purchases or charges and any improper charges that exceed established limits without an approved exception.
12. Reconciliation of the Purchasing Card Log to the bank statement on a monthly basis. The reconciliation process shall be completed within ten (10) business days from receipt of the bank statement.
13. Ensuring vendors remove Connecticut state sales tax prior to processing payment on the card.
14. Filing a Missing Receipt Affidavit with appropriate justification if a receipt is lost or otherwise unavailable.

Verifier Responsibilities

Any person with authority to verify reconciled purchases is responsible for:

1. Adhering to the provisions in this policy and any related procedures.
2. Consulting with Procurement Lead regarding appropriate usage and limits of P-Card for an individual cardholder. Recommending card limits and approved commodities for a cardholder.
3. Ensuring that the cardholder application is consistent with the employee's purchasing authority and departmental budget.
4. Ensuring an individual cardholder has completed mandatory training before a card is distributed.
5. Reviewing reconciled Purchasing Card Logs and ensuring purchases were made for departmental use and approving or obtaining appropriate departmental approver's signature.
6. Identifying misuse and reporting misuse consistent with section IV of this policy.
7. Contacting P-Card Administrator to cancel card if a cardholder's employment is terminated or to enact changes to the P-Card terms and limits.

Institution Responsibilities

Institutions and the system office are responsible for:

1. Establishing, and making widely available, P-Card application approval (including eligibility criteria), reconciliation, violation response, and audit procedures.
 - a. The audit procedures must, at a minimum, establish frequency of audit; how the sample is selected; and the scope of the audit.
 - b. Audit findings will be compiled by the system office to identify trends and prevent waste and abuse.
 - c. Institutions may rely on system office support regarding any related procedures and administration.
 - d. Institutions must submit their procedures to the CSCU Chief Compliance Officer by the effective date of this policy to ensure they are compliant with the provisions of this policy.

- e. policy.
- 2. Limiting the number of active P-Cards. In establishing eligibility criteria, institutions must review existing P-Cards and determine whether there continues to be a need. Each issued P-Card should have justification filed with the System P-Card Administrator.
- 3. Enforcing P-Card misuse consistent with section IV of these procedures.

IV. Enforcement

Individuals who are responsible for auditing or reconciliation of P-Card transactions must report transactions that are prohibited by the policy or inconsistent with Cardholder Responsibilities to the Cardholder, their manager, and the P-Card Administrator. In the case of the college and university presidents, the Chancellor is the approval authority and for the Chancellor it is the Chair of the Board of Regents. Repeated reckless or intentional failure to adhere to this policy or related procedures may result in the following:

- Retraining on the permitted uses of the P-Card and cardholder responsibilities; and
- Suspension of a Cardholder’s usage of the P-Card for a defined period or permanently; and
- Personal liability for any misuse of the card, including misuse resulting from the failure to properly safeguard the P-Card.

Violations of this policy may also constitute violations of additional personnel policies, such as the *Code of Conduct For Regents, Employees and Volunteers*. Individuals may be subject to disciplinary action up to and including termination of employment under those policies.

CSCU Board of Regents

CT BOARD OF REGENTS FOR HIGHER EDUCATION

RESOLUTION

Concerning

Adoption of CSCU Purchasing Card Policy

February 27, 2025

WHEREAS, Connecticut State Colleges & Universities (CSCU) seeks to establish a purchasing card policy to ensure efficient, transparent, and accountable procurement processes while streamlining purchases for faculty and staff; and

WHEREAS, a CSCU Purchasing Card Policy will enhance financial controls, help to mitigate financial risks, enforce compliance, and improve overall operational efficiency; and

WHEREAS, the Office of the State Comptroller, in a December 2024 Report to the Governor, recommended that CSCU establish a comprehensive centralized policy related to P-Card usage and restrictions which addresses training and expectations of cardholders, proper documentation, and segregation of duties in the approval process; and

WHEREAS, the CSCU Purchasing Card Policy supersedes and replaces all other CSCU System and individual institution college and university purchasing card policies active as of the date of this approval; and

WHEREAS, the Board requires the Chief Compliance Officer and the Chief Fiscal Officer to provide a report to the Finance Committee of the Board six months from the effective date of the Purchasing Card Policy on the progress of reducing the number of purchasing cards in use across the CSCU system, the number of employees changed, and the number of policy violations to date; now, therefore, be it

RESOLVED, that CSCU hereby adopts the CSCU Purchasing Card Policy, outlining guidelines for the responsible use of purchasing cards by authorized employees with an effective date of April 1, 2025.

A True Copy:

A handwritten signature in black ink that reads "Pamela A. Heleen". The signature is written in a cursive style with a long horizontal flourish at the end.

Pamela Heleen, Secretary of the
CT Board of Regents for Higher Education