

 CABRINI UNIVERSITY	Procedure: Gift Card(s) or Gift Certificate(s), Purchase, Use, Parameters & Criteria for Employees, Students, Volunteers, Research Studies & Alumni
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Business Office Policies and Procedures	Last Updated: January 3, 2022
Area: Procurement	Verified: Diane Scutti

Policy:

This policy establishes the criteria and parameters for the purchase, use and distribution of NONCASH Gift Card(s) or Gift Certificate(s). Its intent is to ensure the dollar amount of the expenditure is modest, prudent and appropriate to the significance of the business purpose. The purchase and use of a Gift Card(s) or Gift Certificate(s) is not to recognize events of a personal nature such as bridal showers, weddings, births, birthdays, retirements, promotion or general gift giving.

The Business Office is responsible for managing the program and each Chair, Dean or Director is responsible for managing their area’s Gift Card(s) or Gift Certificate(s) purchase, distribution and reconciliation. Vice Presidents are responsible for oversight of the Deans and Directors.

Each Gift Card(s) or Gift Certificate(s) must be purchased, distributed, accounted for and reconciled within the same fiscal year along with a paper trail present for auditing purposes. There should be no cards on hand at the close of the fiscal year, which is June 30th. Gift Card(s) or Gift Certificate(s) should not be purchased to exhaust any remaining budgetary funding for use in the new fiscal year. Currently, Gift Card(s) or Gift Certificate(s) purchases fall under the Purchasing Card Merchant Category Code Restrictions (MCC) parameters.

ALL GIFT CARD OR GIFT CERTIFICATE PURCHASES MUST BE MADE USING A CABRINI ISSUED PCARD.

Definitions:

Any Store Gift Card (Bank): are gift cards issued by banks for companies like Visa, Mastercard, Discover and American Express.

Gift Certificate: also known as a gift card, which is physical paper or a plastic gift card that is exchangeable for a specified cash value of goods from a particular place of business.

Electronic: also known as e-gift cards, digital gift cards and virtual gift cards, which are non-physical paper or plastic gift cards delivered to the recipient using email technology by participating merchant retailers.

Pre-Paid Amount: preloaded with a specific dollar amount assigned and redeemed as a declining debit card to spend down the amount.

Single/Family/Multi Store Gift Card (Merchant): are gift cards associated to a particular single, family or multi store merchant retailer(s).

Procedure:

Gift Card(s) or Gift Certificate(s) purchases require the completion and Chair, Dean, Director or Vice President approval of the "Gift Card Request Form" PRIOR to purchase using all approved payment methods. The form is to be scanned to the Procurement Manager for final review and approval. The approved form will be returned to requestor within one (1) business day.

Gift Card(s) or Gift Certificate(s) distribution will require the receiver to acknowledge receipt of any and all Gift Card(s) by completing the "Gift Card Recipient Form". For events with many awarded Gift Cards or Gift Certificates as prizes a list of recipient names is acceptable. A copy of the completed form or list should be submitted with a reconciled PCard statement or check request including all receipts.

Single or small quantity Gift Card(s) or Gift Certificate(s) purchases (\$5-\$50 card limit and total purchase less than \$999) can be made using a University issued PCard, Campus Book Store House Account or cash. Upon request, the Procurement Manager or PCard Program Administrator will provide a temporary MCC lift restriction on the PCard in order for the Gift Card(s) or Gift Certificate(s) to be purchased. Bulk Gift Card(s) or Gift Certificate(s) purchases above the \$1,000 limit in a fiscal year require the approval of the Controller.

I. ALLOWABLE AND NOT PERMITTED USES

Gift Card(s) or Gift Certificate(s) may be purchased with a nominal value (not to exceed \$50.00 per person, per semester, per event) as follows:

A. Types of Gift Card(s) or Gift Certificate(s)

- Acceptable forms of Gift Card(s) or Gift Certificate(s) include:
 - ✓ Cabrini University Campus Book Store – *must present approved Gift Card Request Form at the time of purchase when using the House Account or a Cabrini issued PCard.*
 - ✓ Amazon – must use Cabrini's Amazon Business Account. Personal Amazon accounts are not permitted.
 - ✓ Entertainment Venues
 - ✓ Store Merchant (Wawa, Starbucks, Target)
 - ✓ Cash (Visa, Mastercard, Amex)
 - ✓ Virtual (preapproval required from Procurement Manager)

B. Employees

- Any employee of Cabrini University is not eligible to receive a Gift Card(s) or Gift Certificate(s). All employee compensation is to be approved by Human Resources and paid through Payroll.

C. Honoraria

- Anyone that receives a stipend as an Honorarium cannot be compensated with a Gift Card(s) or Gift Certificate(s). Please see Honorarium Check Request Form and guidelines on the Business Office website.

D. Students

- Students may receive a Gift Card(s) or Gift Certificate(s) to recognize outstanding service to the University, or for competitions, prizes or assessments. Students cannot receive a Gift Card(s) or Gift Certificate(s) as a form of compensation.

E. Volunteers

- Volunteers may receive a Gift Card(s) or Gift Certificate(s) to recognize outstanding service to the University. Volunteers cannot receive a Gift Card(s) or Gift Certificate(s) as a form of compensation.

F. Grants

- Individuals participating in approved research projects, non-research activities, surveys and studies may receive a Gift Card(s) or Gift Certificate(s). Excluding Cabrini University employees, who are not eligible for compensation via a Gift Card(s) or Gift Certificate(s).

G. Alumnus

- Alumni volunteers may receive a Gift Card(s) or Gift Certificate(s) to recognize outstanding service to the University. Alumni cannot receive a Gift Card(s) or Gift Certificate(s) as a form of compensation or as a celebratory reward.

H. Vendors

- Vendors and independent contractors that provide a service or product cannot receive a Gift Card(s) or Gift Certificate(s) as a form of payment.

II. INVENTORY

Department holding a Gift Card(s) or Gift Certificate(s) should keep a physical inventory using the "Gift Card Inventory Log Form" or an Excel spreadsheet for each card purchased. Each Gift Card(s) or Gift Certificate(s) purchased should be accounted for and safeguarded at all times. The inventory log should be updated each time a card is purchased and the information recorded as follows:

- Date purchased
- Payment type (PCard, cash)
- Name of gift card
- Amount
- Card number
- Card Access code
- Activation code (from receipt)
- Expiration date
- Distribution date

The Business Office will annually audit all inventory logs or Excel spreadsheets and collect the documentation by the second week of July.

III. LOST OR STOLEN GIFT CARD(S)

The purchaser of a Gift Card(s) or Gift Certificate(s) is responsible to safeguard the Gift Card(s) or Gift Certificate(s) in a secure location at all times. Stolen Gift Card(s) or Gift Certificate(s) should be reported to Public Safety and the Procurement Manager immediately. Lost Gift Card(s) or Gift Certificate(s) should also be reported to the Procurement Manager immediately.

Instructions to report a card that has been lost or stolen to the merchant:

- Visit the website of the company named on the Gift Card(s) or Gift Certificate(s) and check its policy for lost or stolen cards. Some retailers will not offer a replacement or reimbursement.
- Report the Gift Card(s) or Gift Certificate(s) lost or stolen to the merchant.

IV. GRANT-FUNDED DISBURSEMENTS

University research projects, non-research activities, surveys and studies may utilize a Gift Card(s) or Gift Certificate(s) to acknowledge participation. When a Gift Card(s) or Gift Certificate(s) is being purchased with grant funds, the following criteria must be met in addition to the other guidelines noted previously in the policy:

- The Gift Card(s) or Gift Certificate(s) payment must be allowable by the stated terms and conditions of the specific grant.
- The Gift Card(s) or Gift Certificate(s) must only be to acknowledge participation.
- Costs for participant payments must be included in the approved grant budget.
- Gift Card(s) or Gift Certificate(s) cannot be purchased for any non-grant activities using grant funding.

V. COMPLIANCE

Failure to comply with the policies and procedures may be subject to disciplinary actions in accordance with all applicable laws, regulations, policies and termination.

Policy violations include, but are not limited to:

- Alternative Form of Compensation;
- Declined PCard Purchases;
- Excessive Gift Cards or Gift Certificate(s) Issued to the Same Person;
- Fraud, Misuse or Abuse;
- Grant Guidelines;
- Large Single Amounts;
- Missing Receipts;
- No Pre-Approval;
- Repeated Lost or Stolen Gift Cards or Gift Certificate(s); and
- Tax Charges

Violation notification will occur as follows:

- 1st Occurrence: Written warning to Purchaser via email;
- 2nd Occurrence: Written warning to Purchaser and Dean or Director via email;
- 3rd Occurrence: Email notification to Dean/Director and Vice President; and Human Resources involvement on a case-by-case basis for disciplinary action.

The Procurement Manager, in conjunction with the Controller, Department of Public Safety and Human Resources, may investigate the circumstances surrounding lost or stolen Gift Card(s) or Gift Certificate(s). If the investigation findings demonstrate the purchaser and/or issuer of the Gift Card(s) or Gift Certificate(s) did not use adequate internal controls, as defined by this policy, he or she cannot be the purchaser and/or issuer for any future Gift Card(s) or Gift Certificate(s) purchases.

If the investigation indicates there might have been an intentional misappropriation of the Gift Card(s) or Gift Certificate(s), the Procurement Manager and Controller will consult with Human Resources on the next steps. Consequences may include termination of employment and referral of the matter to a law enforcement agency.

VI. FORMS

- Gift Card Request Form
- Gift Card Recipient Form
- Gift Card Inventory Log Form

VII. IMPLEMENTATION

Effective February 27, 2019

Policy subject to adjustment in accordance with other University policies.

- Revised December 1, 2019 to incorporate Chair approval responsibilities.
- Clarification on January 3, 2022 with the addition of definitions.
- Clarification on May 20, 2022 with addition of Gift Certificate definition.