CORPORATE CREDIT CARD POLICY

Dated: January 28, 2019  
Supersedes: None

I. PURPOSE
The purpose of this policy is to define the responsibility for and use of a New York Medical College ("NYMC" or "College") Corporate Credit Cards ("Corporate Card" or "Card"). The policy also serves to identify managerial reporting related to Corporate Card purchases, improve oversight effectiveness, reduce costs of payable processing and mitigate the risk of potential abuse (i.e., using it for personal gain, fraud or other unauthorized purposes).

II. POLICY
Corporate Cards are issued to employees in good standing only upon approval of the President, Chancellor, Chief Financial Officer ("CFO"), or VP for Financial Operations when deemed necessary due to purchasing and operational responsibilities. Corporate Cards are to be used for business related purposes. Cash advances drawn from credit cards are not allowed.

Use of the Corporate Card is authorized for the purchase of local, domestic and international travel and goods and services on behalf of the College. Use of a credit card should not circumvent the College Purchasing Policies, including the requirement to obtain a purchase order ("PO") prior to using a credit card for items that require a PO.

Cardholders must not exceed the credit limits that have been set for their Cards and must use their Cards in accordance with all College policies, including but not limited to:
- Procurement and expenditure policies
- Sponsored project policies
- Misappropriation of College Assets and
- All applicable government laws and regulations.

Internal and external auditors may perform periodic audits of Card use. All employees must fully cooperate and make all documents available when requested by auditors.

Individuals who do not adhere to these policies and procedures risk revocation of their Card privileges and/or disciplinary action including termination of employment or prosecution.

III. SCOPE
The use of each Card is governed by the conditions set out in this policy and the relevant Cardholders’ Responsibility Statement by the bank issuing each Card. Cardholders and their supervisors are responsible for ensuring that they adhere to this policy and the bank’s policies. Cardholders and their supervisors should refer to the CFO or VP for Financial Operations for further
information on their role in relation to fraud and corruption prevention or misuse.

IV. DEFINITIONS
Cardholder- shall mean and include for purposes of this policy the individual who is authorized to hold and use a Corporate Card as a purchasing agent for the College.

V. PROCEDURES

A. Cardholder Record Keeping and Retention
Any employee who receives a Corporate Card must sign the Cardholder Agreement form acknowledging that they have reviewed and agree to comply with this and any related policies. (See Appendix A). The Corporate Card holders must retain detailed receipts for purchases in accordance with College Expense and Reimbursement Policy and Procedures.

In accordance with Internal Revenue Service regulations, each receipt for meals and entertainment must include the date, time, names of all persons involved in the purchase, and a brief description of the business purpose of the purchase. Detailed meal receipts must be submitted, not just the credit card receipt.

Detailed receipts must be submitted to Accounts Payable within 10 working business days of receipt of Card statements to enable timely payment of amounts due by the Cardholder or their designee. All statements submitted for payment must 1) have the appropriate FOAP written on the statement for each charge and 2) include the initials of the cardholder and appropriate approval, consistent with guidelines established in the College’s policies on signing authority.

B. Cardholder Responsibilities
1. Cardholders must retain transactional evidence to support all charges. An acceptable receipt for reimbursements of claimable business expenses on the Card is an original receipt (which may include a receipt emailed by the vendor). Card purchases without receipts are ultimately the responsibility of the Cardholder.
2. Cardholders or designees must reconcile original receipts to the Credit Card monthly statements and forward the approved statement and receipts to Accounts Payable for further processing.
3. Cardholders should keep a copy of the card on file for his/her own records (back and front)
4. Reimbursement for return of goods and/or services must be credited directly to the Card. The Cardholder should receive no cash for return of goods.
5. Lost or stolen Cards must be cancelled immediately by the Cardholder by contacting the Lost/Stolen Cards Unit of the credit card bank along with notifying Accounts Payable and Purchasing.
6. Prior to departure or termination from the College, the Cardholder must reconcile all expenditures on his/her Card account. The Card must be surrendered upon termination of employment or other request to their immediate supervisor or to the CFO or VP for Financial Operations. Supervisors must return Cards to the
Purchasing Department.

C. **Supervisor Responsibilities**
The Cardholders’ supervisor or designee is responsible for:
1. Reviewing expenses for legitimacy, accuracy, and sufficiency of documentation.
2. Promptly reporting a cardholder's departure from approved policies to the Compliance and Purchasing Departments;
3. Obtaining the card from a departing employee and returning it to the Purchasing Department prior to approving any final payments due to employee;
4. Reporting known or suspected misappropriations to the Internal Audit Department, the Compliance Department and/or the CFO or VP for Financial Operations.

D. **Finance Staff Responsibilities**
Finance staff is responsible for:
1. Distributing a copy of the relevant statement page containing charges to each employee who has incurred charges;
2. Reviewing expenses to ensure compliance with College policies and to confirm transaction coding on a monthly basis;
3. Reconciling all statements;
4. Vouchering Corporate Card activity on Touro’s accounting system; and
5. Ensuring that Corporate Card balances are paid in a timely manner.

E. **Corporate Card Limits**
Each Card may be limited to a maximum set by the CFO or VP for Financial Operations, who will determine the limit on the basis of expected need and available budget.

VI. **EFFECTIVE DATE**
This policy is effective immediately.

VII. **POLICY MANAGEMENT**
Responsible Executive: Chief Financial Officer
Responsible Office: Department of Finance
Appendix A Cardholder Agreement Form

As a cardholder, I hereby agree to comply with the terms and conditions of the New York Medical College Corporate Credit Card Policy as it currently exists and as it may be subsequently revised from time to time (the “Policy”). I acknowledge receipt of the Policy and confirm that I have read and understand its terms and conditions.

As the holder of a Corporate Credit Card, I agree to accept responsibility for the protection and proper use of the card and to keep and submit proper documentation for all purchases as outlined in the Policy. I understand that the College will audit the use of the Corporate Credit Card. I understand that the Corporate Credit Card is to be used for business use only.

I further understand that improper use of the Corporate Credit Card may result in disciplinary action, up to and including termination of employment. Should I fail to use the Corporate Credit Card in accordance with the Policy, I understand that I will be personally responsible for any improper charges on the Corporate Credit Card. I agree to that New York Medical College and the Touro College and University System (the “College”) may take any step necessary to collect any amounts owed by me even if I am no longer employed by the College, including payroll deductions. If the College initiates legal proceedings to recover amounts owed by me under this Agreement, I agree to pay legal fees incurred by the College in such proceedings.

I understand that the College may terminate my right to use the Corporate Credit Card at any time for any reason. I agree to return the Corporate Credit Card to the College immediately upon request or upon termination of employment. I understand and agree that this Agreement supersedes and replaces any prior agreements between me and the College regarding the Corporate Credit Card.

Cardholder’s Name (Print Name) ________________________________________________

Cardholder’s Signature ________________________________________________________ Date __________

Supervisor’s Name (Print Name) ________________________________________________

Supervisor’s Signature _________________________________________________________ Date __________

Please return the signed copy to the Purchasing Department.