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Policy Statement

The Vanderbilt University One Card is the preferred payment method of most business related travel and small dollar purchases of goods and limited services by Vanderbilt University schools and departments. The use of a purchasing card significantly reduces the time spent purchasing and paying for small-dollar, high-volume transactions while maintaining adequate controls. The Payment Card team will review and revise this policy annually to reflect current business needs. All permitted exceptions are noted herein.

Program Scope

The One Card Program is a U.S. Bank issued, MasterCard branded, corporate pay-corporate liability, credit card that enables authorized employees to use the card for approved business-related expenses. The One Card is not intended to replace or bypass any existing department’s purchasing methods through eProcurement or other procurement methods already established. Note that items purchased on the One Card that normally are purchased through eProcurement, will not receive contract pricing and should be discussed with the Procurement office prior to any purchases in question. Cardholders should also reference Procurement’s Gold Guide to identify approved suppliers and appropriate payment methods.

Guiding Principles & Objectives

The guiding principles and objectives of the One Card Program include:
- Ensure Cardholders use their One Card only for individual business needs
- Increase individual Cardholder accountability
- Streamline the expense/approval process through Concur
- Minimize financial and operational risks
- Reduce the need for costly check requests, invoices, etc.
- Alleviate individual financial burden for approved business travel

Who is Affected by this Policy & Associated Responsibilities

This policy applies to any member of the university community who seeks to establish, maintain, approve or conduct transactions involving the Vanderbilt One Card.

Cardholder – The employee whose name is printed on the card and is accountable for all charges and physical security of the card at all times. Note: The Cardholder’s name will be printed on the card as it is recorded in the Vanderbilt Human Resources System.

Expense Report Approver (ERA) – The employee authorized to approve business expenditures of others will administer these policies and is responsible to:
- Attest that the purpose of the expense is valid and directly related to university business.
• Request further documentation or explanation for expenses that appear to be excessive or unusual in relation to the nature of the expense. Explanation of such expenditures must be included within the expense report.
• Approve expense reports on a timely basis.
• Ensure the appropriateness of each card transaction.

Privilege Approver – The employee, assigned by Home Department within the Privilege Management system, responsible for approving high risk privileges including applications for the One Card. The Privilege Approver is also responsible for reviewing and approving all limit increases submitted by their Cardholders.

Expense Delegate – The employee assigned by the Cardholder to create and edit expense reports within Concur on the Cardholder’s behalf. Note: Expense Delegates cannot submit the report to the ERA for approval. Only the Cardholder can complete report submission.

Travel Assistant/Arranger – A Vanderbilt employee with an active Concur profile authorized by another employee to book travel reservations (airfare, hotel, and car rental) on their behalf.

Payment Card Administrator – Payment Card team member responsible for issuance, administration, and maintenance of Vanderbilt’s One Card. The Payment Card Administrator also serves as the liaison between Vanderbilt, the card provider (U.S. Bank), and the Cardholder.

Payment Card Auditor – Payment Card team member responsible for the analysis, reporting, and auditing of all transaction data related to the Payment Card program. The auditor performs routine audits to ensure Cardholder usage complies with the One Card policy.

Card Provider – The financial institution responsible for issuance of Vanderbilt’s One Card. The card provider is responsible for printing and delivering One Cards to the Vanderbilt Program Administrator prior to issuance to Cardholders. The card provider also is responsible for preparation of billing statements and coordination of fraud resolution in conjunction with the Payment Card team.

Definitions

One Card – A payment card issued to an employee of Vanderbilt University for authorized business-related purchases. The card is only authorized to be used by the employee (printed on the front of the card) for business related purchases directly related to the Cardholder. The university will issue payment for charges incurred using the One Card.

One Card Application Form – The form to be completed by prospective Cardholders to obtain a One Card. The applicant, their ERA, and the Privilege Approver of the prospective Cardholder’s HR home department must sign the application. The One Card application can be found on the Payment Cards website, along with how to locate your Privilege Approver.

Cardholder User Agreement – A legally binding agreement signed by the Cardholder and the ERA that is a part of the One Card Application, certifying that the Cardholder has read and understands the guidelines set forth in the Payment Card Policies and Procedures and agrees to use the One Card.
accordingly. The Cardholder User Agreement is the 2nd page of the One Card application and can be found on the Payment Card website.

**Merchant Category Codes (MCC)** – An industry standard coding system that consists of a four-digit number that is assigned to a business by major card issuing networks (MasterCard, Visa, American Express, etc.) when the business starts accepting one of these cards as a form of payment. The MCC is used to classify the business by the type of goods or services it provides. For example, McDonalds should have an MCC designation as 5814 - Fast Food Restaurants.

**Transaction Limit** – A control set on each card that limits the total dollar amount the Cardholder may purchase on a single transaction. A single transaction can include one item purchased or multiple items purchased at the same time, also known as “per swipe”. Transactions exceeding a Cardholder’s transaction limit will result in a transaction decline. The prospective Cardholder selects the transaction limit on the One Card application and the ERA and Privilege Approver approve during the application process.

**Monthly Spending Limit** – A control set on each card that limits the total dollar amount of all transactions that can be placed on the card within a single, monthly billing cycle. The prospective Cardholder selects the monthly spending limit on the One Card application and the Payment Card team approves during the application process.

**Monthly Billing Cycle** – The timeframe to which all Cardholder transactions are aggregated and applied to the Cardholder’s monthly spending limit. U.S. Bank monthly billing cycles typically end on the 25th of each month. If the 25th falls on a weekend or banking holiday, the cycle will close the next business day. Monthly spending limits will reset the day after cycle close.

**Split Transactions** – A single transaction or purchase split into multiple charges in order to avoid the single transaction limit threshold. Split transactions are strictly prohibited and continuously reviewed by the Payment Card team. Cardholders are expected to go through the limit increase approval process listed in the Credit Limit Increase section below to ensure all Privilege Approvers are aware that the transaction is above the current assigned limits.

**Supporting Documentation (Substantiation)** – An itemized merchant receipt issued by the supplier to substantiate the business transaction including proof of payment.

- Supporting documentation should include:
  - Name of the merchant
  - Date of the transaction
  - Items purchased
  - Total amount
  - Form of payment (usually the last 4 digits of the card used)
ONE CARD POLICY
This policy outlines the proper usage and guidelines for the use of the Vanderbilt One Card. The Payment Card team actively monitors card usage outside of this policy and subsequent procedures and violations are subject to disciplinary actions including revoking of card privileges and, depending on the offense, grounds for employee termination. Concurrent with this policy, users should also reference the Travel policy for any travel related activity.

Cardholder Eligibility and Responsibilities
- All Employees are eligible for the Vanderbilt One Card.
  - Students are not permitted to hold a One Card.
    *If a card is needed for student use, contact the Payment Card team.*
- Cardholders must complete the required online One Card Training module in the Learning Exchange before the card is issued to the Cardholder. Additional training is highly recommended and is available on the payment cards website.
- Cardholders are to read and sign the Cardholder Agreement (attached to the One Card Application).
- Cardholders should never expense transactions before they post within their Concur profile (manually entering transactions and expensing in Concur).
- Supporting documentation is required for every transaction $25 or more and must be attached to each transaction in Concur.
- On an annual basis, Cardholders will be required to agree to an annual One Card Refresher Agreement that will update users on policy revisions, policy review, and program changes.

Authorized Usage
The Vanderbilt One Card provides Cardholders the flexibility to purchase low dollar goods or services and serves as an individual travel and expense card on Vanderbilt approved business trips. The Cardholder (name printed on the front of the card) must be the only one making purchases and the card is not to be shared with any other individual. Authorized purchases are for individual business need and not intended to purchase items for other employees, with exception for items that will be for communal office use. Employees who have previously had items purchased by another Cardholder (membership dues, professional certifications, etc.) are expected to use their personal credit cards or obtain a One Card for their own individual business needs.

All One Card transactions are reconciled by the Cardholder in the Concur expense management tool to align with Vanderbilt’s individual accountability and reporting standards. Concur will serve as the sole location for users to upload receipts, reconcile transactions, submit expense reports, and store all historical supporting documentation for all business-related transactions.

The following page provides examples of approved and unapproved One Card transactions.
### Approved Purchases – Examples

- Books & Journal Subscriptions
- Business Meal Expenses
- Catering Expenses
- Gift Cards*
- Professional Dues & Memberships
- Lab Supplies (if not available in eProcurement)
- Office Supplies (if not available in eProcurement)
- Repairs (not under an existing contract)
- Shipping/ Freight/ Postage
- Small Dollar Retail Purchases

### Approved Purchases for Travel

- Conference/ Registration Fees
- Individual Airfare
- Car Rentals
- Fuel (rental car)
- Guest Airfare (*ONLY if the Cardholder is designated as a Guest Travel Coordinator in Concur*)
- Hotels, Motels, Lodging (does not include property rentals/ leases)
- Ground Transportation
- Meals

*Contact the Payment Card team before purchasing any gift cards on the One Card, also reference the Potential Tax Liability section.

### Prohibited Purchases on One Card

- Capital Purchases*
- Cash Advances (bank or ATMs) w/o prior written approval from the CFO
- Consulting Services
- Contracted Services*
- Controlled Substances or Prescription Drugs
- Fees & Membership Dues (for anyone other than the Cardholder)
- Firearms/ Ammunition
- Furniture (without prior written approval from the Procurement office)*
- Insurance Policies & Premiums
- Laboratory Animals and Animal Related Purchases
- Moving Companies – Alexander’s, Atlas Van lines*
- Office Supplies – Guy Brown*
- Patient Care Products & Equipment (medical supplies)
- Personal Use
- Radioactive & Hazardous Materials
- Shredding Services – Cintas*
- Software Maintenance/ Licenses/ Services*
- Subject Participation Payments (contact the Payment Cards team)
- Tax Payments
- Travel Agencies
  - 3rd party travel websites such as Orbitz, Priceline, etc.
  - Cardholders are expected to book travel through Vanderbilt’s approved travel agency
- Water/ Coffee Services – DS Waters*

*Please direct questions on existing contracts or options for purchasing these goods and services to the Procurement office and reference the Vanderbilt Gold Guide.
Card Maintenance
Email approval from the Cardholder’s Home Department Privilege Approver is required for any limit increases. Send this email to the Payment Card team at paymentcards@vanderbilt.edu. Any approved limit increases will be retained on the Cardholder’s account. The Payment Card team will not grant temporary limit modifications. Cardholders that have a name change should notify the Payment Card team to order a new card.

Cardholder Responsibilities
Each Cardholder is responsible and accountable for the One Card issued in their name. Employees or students other than the assigned Cardholder cannot use that individual’s card. Cardholders are responsible for reviewing all transactions that post to their individual Concur profile within 7 days to ensure each transaction is a valid Vanderbilt business expense that they authorized the merchant to charge. If fraud is suspected, refer to the Fraud Process section in the procedures appendix.

All One Card transactions must be submitted in an expense report* by the Cardholder and then approved by the ERA in Concur within 30 days of the transactions posted date. Non-compliance could result in suspension or cancellation of the payment card. Cardholders are encouraged to assign an Expense Delegate in Concur in case of a situation where the Cardholder is unable to expense charges. *Exception: If the charge is a prepayment or deposit for a future event/function/trip then the Cardholder or delegate should not submit an expense report until that event/function/trip has concluded.

As part of the Concur expense report process, transactions need to be assigned an expense type and a business purpose. Receipts should be imaged, uploaded, and attached to all transactions $25 or more. Each transaction should be allocated to the appropriate cost center, itemized, etc. to complete the expense report prior to submission to the ERA.

It is the responsibility of the Cardholder to contact the merchant when merchandise purchased with the One Card is unacceptable (incorrect, damaged, defective, etc.) and arrange for returns, credits, services, or exchanges. If merchandise is returned for credit, the Cardholder is responsible for obtaining a credit receipt from the merchant and retaining that receipt with the support documentation for that purchase. Receiving cash or checks to resolve a credit or return is prohibited. It is the responsibility of the Cardholder to ensure that the items are not purchased from a merchant that issues only store credit. If a merchant accepts an item as a return, a credit for this item should appear in the Cardholder’s Concur profile along with other transactions.

Cardholders are also responsible for reporting lost, stolen, or damaged cards to the Payment Card team as well as any fraudulent activity. If the Cardholder takes a leave of absence, accepts another internal position, or is separating from Vanderbilt, see the Cardholder Leave of Absence, Change in Position, Employee Termination section in the procedures below.

Card Security
All One Cards are embedded with chip technology. Chips are a fraud prevention measure put in place by Europay, MasterCard, and Visa (commonly abbreviated EMV). EMV Chips are intended to lower the risk of card information that can be stolen and loaded onto a counterfeit card and to help verify the card is being used by its intended user. Employees are only authorized to use a One Card that has been

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issued in their name (the user’s name must be printed on the plastic card). Cardholders cannot let anyone else to use their card. Cardholder’s are also required to have the card in their possession at all times or at a secured locked location within their campus office.

In addition to EMV technology, One Cards will be issued with a PIN number that may be required at the time of purchase (depending on the merchant’s point of sale equipment). Each Cardholder’s PIN should be stored in a secure location and never written on the card.

Vanderbilt One Cards are designed to be used at any point of sale device around the world.

**ERA Responsibilities**

ERA’s are responsible for reviewing the supporting documentation and business purpose of each transaction submitted in Cardholder expense reports. ERA’s are also responsible for reviewing their ERA Report, which is automatically generated and sent by Concur on the 20th of each month. ERA Reports contain all unexpensed transactions of all Cardholders under the ERA. The Payment Card team will review and notify ERA’s of unexpensed transactions that are in severe delinquency or are of concern.

**Policy Violations**

The Payment Card team and financial leadership and/or the ERA will address violations to this policy on a case by case basis.

The Payment Card team and financial leadership/ERAs reserve the right to revoke card privileges from the Cardholder. At any time in extreme cases or gross misuse, leadership may resort to employee termination.

Violations include:

- Card misuse, personal and unauthorized transactions
- Split transactions in order to stay under assigned card limits
  - *Cardholders found to have knowingly allowed a merchant to split a transaction to bypass their transaction limit could lose their card and their ability to obtain a card in the future*
- Failure to expense transactions and submitting expense reports timely in Concur
- Failure to attach the appropriate supporting documentation for transactions
- Failure to report known fraudulent activity to the Payment Cards team within 90 days of activity
- Failure to agree to the annual One Card policy refresher agreement

**Cardholder Transaction Review, Audits, and Frequency**

Cardholders are expected to expense and submit their One Card expense reports to their ERA **within 30 days from the posted date or completion of travel or event.** However, if a charge is under dispute, considered fraudulent or a credit is anticipated, the Cardholder should reach out to the Payment Card team for steps to resolve disputes and fraud. If the Cardholder is expecting a credit the Cardholder should wait and expense the credit transaction along with the original transaction on the same expense report.
The Payment Card team reserves the right to perform audits on all One Card activity. Audits will examine MCC category codes, business purpose, transaction appropriateness, and verify that each transaction has the proper supporting documentation. Violations will be tracked and reported to financial leadership.

If the Cardholder transaction activity is less than 12 transactions in a 6 month period or 24 transactions in a 12 month period, the Payment Card team will notify the Cardholder and cancel the card. If a Vanderbilt employee has a legitimate business need for a One Card but does not meet activity requirements, contact the Payment Card team for alternative options.

Sales Tax Exemption

Vanderbilt University is a non-profit 501(c) (3) private institution of higher education incorporated in the State of Tennessee. The Tennessee sales tax-exempt number is printed on the front of every One Card. Cardholders should give this number to all merchants at the time of purchase to exempt the transaction for Tennessee state sales tax. Transactions made by the university outside of Tennessee, may not be exempt from another state's sales and use tax. For your convenience, we recommend having a Certificate of Exemption with you at all times.

- TN State Tax Exempt Form
- Out of State Sales Tax Exemption Listing

Potential Tax Liability: Reporting of Taxable Gifts, Awards and Prizes

Gifts, gift cards, gift certificates, awards, and prizes given to faculty, staff members, or students must be reported to Human Resources so the value can be added to the employees' taxable income and the appropriate taxes (Federal withholding, Social Security and Medicare) withheld from the employees' pay.

Cash awards, gift cards, and gift certificates of any value are always taxable to the employee and must be reported at the time the gift or award is given. Prior to any such transaction on the One Card, contact the Payment Card team at paymentcards@vanderbilt.edu.

Gifts must be reported by the department using the Reporting of Taxable Fringe Benefits form which is available in the Tools and Forms section of the Human Resources website. Additional information concerning the taxation of gifts, awards and other “perks” is available in the Managers Toolbox of the HR website.

Reporting Charity, Sponsorships and Donations

All transactions on the One Card to a charity, funding a sponsorship, or donation of any kind must be reported to the Payment Card team prior to the transaction at paymentcards@vanderbilt.edu. Alternative payment methods and leadership approvals may be required prior to any payment to a charity, sponsorship or donation.

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APPENDIX: ONE CARD PROCEEDURES

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Payment Card Application Process
A completed One Card Application Form (found on the Payment Cards Website) is required by each prospective Cardholder. The Applicant, their ERA, and the Privilege Approver from the prospective Cardholder’s HR Home Department must sign the application. Your designated ERA is determined by your home department and listed within Privilege Management under “Expense Report Approver”.

The 2nd page of the One Card application is the Cardholder Agreement which is a legally binding document and should be read thoroughly by the Cardholder before signing and submitting the application to the Payment Card team. The Payment Card Administrator will order new cards and the Cardholder will be notified when the card and PIN number are ready. New cards typically take 7-10 business days from the day ordered to arrive.

How It Works: Transaction Life Cycle
1) Cardholder makes an authorized business-related purchase by charging it on their One Card.
2) The bank pays each Cardholder transaction upon card use.
3) Vanderbilt University pays the Card Provider each Billing Cycle for all transactions charged by Cardholders.
4) Once the transaction posts to the Cardholder’s account, the transaction will feed into the Cardholder’s Concur profile within 1-3 days (depending on the merchant). The Cardholder should receive an email notification from Concur when the transaction arrives into their profile and is ready to expense.
   • Note that credits typically take much longer depending on the merchant’s credit card processing system and the merchant’s bank.
5) Cardholder’s are responsible for reviewing all transactions in Concur on a regular basis to ensure each transaction is a valid Vanderbilt business expense and that they authorized the merchant to charge to their One Card. If fraud is suspected, refer to the section titled Fraud Process below.
6) Cardholder’s then create an expense report in Concur. This includes: assigning an expense type, business purpose, attaching any supporting documentation images, and allocating each transaction.
   • Note that either the Cardholder or their assigned Expense Delegate can create a new expense report.
7) Cardholders must submit their expense reports to their ERA within 30 days from when the charges post. To limit the number of expense reports submitted in Concur, the recommendation is that Cardholders submit no more than 2 expense reports per month.
   • Exception: If the charge is a prepayment or deposit for a future event/function/trip, then the transaction should not be expensed until that event/function/trip has concluded. Cardholders should only expense and submit items in which the service was rendered.
     o Example: Plane tickets purchased in May would not be submitted in Concur until July when the trip has already occurred.
8) Supporting documentation attached to each transaction in Concur is stored in compliance with all IRS rules and regulations. There is no need for the Cardholder to store supporting documentation if all transactions have been successfully attached in Concur.
9) ERA approves the Cardholder’s expense report.
10) Cardholder ensures that the expense report status changed to “extracted for payment” in Concur.
Credit Limit Increases
The Privilege Approver of the Cardholder’s Home Department must approve increases to transaction or monthly limits. The Payment Card team will continuously evaluate Cardholder credit limits against actual spending limits to align with any seasonal or permanent spend patterns. Card limits are reviewed no less than annually and the Payment Card team and the Privilege Approver can make adjustments based on card activity at any time.

Reporting a Lost/Stolen/Damaged Card
If a One Card is lost, stolen or damaged, the Cardholder should immediately contact U.S. Bank at 1-800-344-5696. It is imperative that the Cardholder contacts the bank immediately for suspension of the One Card, as the Cardholder is responsible for all charges made on the card until it has been cancelled at the bank. The Cardholder is also responsible for notifying the Payment Card team via email after reporting the incident to the bank. The Cardholder’s card will be cancelled and a new card issued. A One Card that is found after it has been reported lost, stolen, or damaged should be destroyed by shredding the card.

Cardholder Leave of Absence, Change in Position, Employee Termination
If the Cardholder plans a leave of absence from Vanderbilt, the Cardholder is responsible for notifying this to the Payment Card team and their designated ERA as soon as possible. Employees should notify the Payment Card team upon their return to work to reactivate the card. Cardholders that have changed home departments must reapply for a new One Card with approvals from their new ERA and Home Department Privilege Approver. One Cards cannot transfer between departments or divisions. Cardholders must report a change in position to the Payment Card team and their ERA no less than 1 week prior to the last day in their current role.

Employees separating from Vanderbilt are responsible for reporting this to the Payment Card team and their designated ERA no less than 1 week from their last day of work. The Cardholder must also turn in their card to their direct supervisor before they depart and the direct supervisor is responsible for destroying the card of terminated employees.

Declines
In the event of a transaction decline, the Cardholder may call the bank directly at the number printed on the back of the One Card (1-800-344-5696) to obtain the reason for the decline or they can contact the Payment Card team at paymentcards@vanderbilt.edu or 615-322-2911 (option 3).

If a decline has occurred, verify that:
- The merchant has entered the correct expiration date
- The merchant has entered the correct billing address or zip code
- Total purchase amount is not over the card’s assigned transaction or monthly limits
**Disputed Charges**
If a Cardholder cannot resolve a dispute directly with the merchant, the Cardholder should contact the Payment Cards team immediately to initiate the dispute process and complete required documentation. Transactions older than 90 days cannot be disputed through our card provider. Both the debit and credit should be allocated together in an expense report to the same center.

**Fraud Process**
Each Cardholder is responsible for monitoring all transactions within their Concur profile. Each Cardholder (and any assigned expense delegates) will receive email notifications from Concur when a One Card transaction feeds into Concur. If you suspect fraudulent charges on your account, you should contact the Payment Card team immediately at paymentcards@vanderbilt.edu or 615-322-2911 (option 3). The Cardholder should report fraudulent transactions to the Payment Card team as soon as they are discovered. Fraud cases are time sensitive and must be reported to the bank within 90 days of the date of the transaction in order to be covered by U.S. Bank’s fraud insurance. Fraudulent transactions not reported during this window of time will become the Cardholder’s responsibility. Failure to report fraud is also a violation of this policy and can result in the loss of all One Card privileges.

If the Cardholder has verified the transactions as fraudulent activity, the Payment Card team will close the existing card, open a fraud case with U.S. Bank on all fraudulent charges, and order the Cardholder a new card with a new card number. The replacement card is sent to the Payment Card office and a member of the Payment Card team will notify the Cardholder once the card is available for pickup.

**Note that U.S. Bank will credit back the total fraud amount back to the Cardholder’s account at the time the case is opened.**

The U.S. Bank Fraud department can also detect suspected fraudulent activity. The bank will notify the Payment Card team to reach out to the Cardholder for transaction verification. **In the event that the bank’s fraud department suspects suspicious activity, the bank will temporarily freeze the Cardholder’s account until the Cardholder has verified the transactions in question. The Cardholder will be unable to place any new charges on the One Card during this time.**

Within a few weeks of opening the case, the U.S. Bank Fraud department will send a form to the Payment Card team that must be completed and signed by the Cardholder stating they did not make the purchase(s). It is the responsibility of the Cardholder to either fax or mail back the form to U.S. Bank at the location specified on the form. **If the fraud form is not sent back to the bank by the Cardholder, the bank will return the fraudulent charges back to the account and the fraudulent transactions will not be covered by the bank.**

**Expensing Fraud in Concur**
The Cardholder should wait to expense both the original fraudulent transactions and fraud credits on the same expense report. The Cardholder should attach any supporting documentation and note that charges were fraudulent.
Contacts & Resources

Visit the payment cards website:  https://finance.vanderbilt.edu/payment-cards/
Email the payment cards team:  paymentcards@vanderbilt.edu
Call the payment cards team:  1.615.322.2911 (option 3)

U. S. Bank Customer Service line:  1.800.344.5696 (Domestic)
                                   1.701.461.2010 collect (International)

Training Resources:  https://finance.vanderbilt.edu/payment-cards/pcard_resources.php

Email Concur Expense team:  concurexpense@vanderbilt.edu
Disbursements website:  https://finance.vanderbilt.edu/disbursements/

Email Vanderbilt Travel team:  travel@vanderbilt.edu
Vanderbilt Travel team website:  https://finance.vanderbilt.edu/travel/index.php

Consistent adherence to the One Card Program policy and procedures is required of all Cardholders and Expense Report Approvers to assure continued eligibility to participate in the program. Failure to adhere to Vanderbilt and Payment Card team policies and procedures could result in the suspension or permanent removal of Cardholder privileges, reporting of violations to HR and/or internal audit, termination of employment, and possible criminal prosecution.

If a terminated, suspended, or transferred employee continues to use this card, the original department will be liable for all charges. The employee may also be subject to criminal prosecution.

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