

[Department Name]
Internal Controls Policy for Gift Cards

Purpose: To provide for the proper safeguarding of gift cards within [Department Name]

In addition to the controls outlined below, [Department Name] staff using gift card cards will follow all guidelines associated with the PSC Procedural Statement, Gift Cards (available at <http://www.cu.edu/psc/psc-procedural-statement-gift-cards-gc>).

Custody

[Insert Custodian Name Here] will serve as the custodian of the gift cards. Any changes in custodian will be approved by the project manager for the study before custodian change paperwork is completed and sent to Finance. [Custodian Name] will be responsible for ensuring that all purchasing, security, dispensing, tracking, and replenishing procedures are followed.

When someone other than the designated custodian must distribute gift cards, the distributor will check out gift cards from the custodian using the Memorandum of Transfer provided by Finance to temporarily transfer custody of the needed amount of gift cards. The transfer documentation will be signed and dated by both parties stating that the recipient agrees to be held accountable for the safeguarding of the gift cards. Each party should receive a copy, and a copy must be kept with the inventory to ensure that responsibility rests with a single individual at any point in time.

Securing

Physical gift cards will be kept in a locked box in a locked cabinet/drawer accessible only by the custodian. The custodian will have access to the keys for the box and cabinet. Gift Cards for separate approved programs will be maintained in separate lock boxes or bags.

Electronic gift cards will be ordered and sent out at the same time so there is no inventory on hand. If applicable - corresponding links or serial numbers, will be stored in a password protected file in a locked folder on the [Department Name] drive (or other secured drive) on the shared server.

Tracking

Gift card custodians will use the Audit Log template provided by Finance to track gift card distributions. Information to be included for each card shall at minimum include: recipient name or study subject ID number, date of payment, purpose of payment, serial number of gift card, payment amount, and signature/initials (or email address for electronic cards) of recipient. **The custodian will contact PCGC@ucdenver.edu** if there are questions about the information that needs to be tracked when gift cards do not meet the standard criteria outlined in the Audit Log provided.

Distribution: When someone other than the gift card custodian must distribute gift cards, the distributor will check out gift cards from the custodian using the Memorandum of Transfer provided by Finance and the distributor will use a pre-numbered receipt book to track the distribution of cards.

Mailing gift cards: When gift cards are distributed via mail, the Business Officer, or another [Department Name] staff member to whom the Business Officer has delegated authority, will witness the distribution of gift cards by mail. The witness will sign a Gift Card Distribution Form

(available in [insert File Path here]) stating that they witnessed the mailing of the cards and citing the corresponding serial numbers.

E-mail or electronic distribution: When gift cards are distributed electronically (by email or other electronic means) and are not physically present in the [Department Name] offices, the custodian will track the appropriate information related to gift cards being purchased and distributed. **The custodian will contact PCGC@ucdenver.edu** if there are questions about the information that needs to be tracked when gift cards do not meet the standard criteria outlined in the Audit Log provided.

W-9 Collection

The custodian will collect a W-9 from participants receiving over \$100 during the calendar year. The W-9s will be maintained in a secure location. The custodian will track payments to ensure a W-9 is collected from all participants who will exceed \$100 in a calendar year. This information will be reported to the Procurement Service Center at the end of the calendar year using the 1099MISC spreadsheet following the instructions provided by the Finance Office.

Recognition Reporting

All gift cards given to University Employees will be reported to Employee Services using the Recognition Reporting Form.

Inventory

The custodian will conduct monthly reconciliations to ensure that the cards purchased and distributed agree with those in the Audit Log. Quarterly, the custodian will have the Business Officer, [Insert Departmental Business Officer/Business Administrator Name here], review and sign off on the reconciliation.

Any shortage must be reported immediately to the Finance Office who will provide further instructions for the next steps.

Audit

[The custodian] will make gift cards and records available for audit by properly identified campus controller's Finance Office personnel or external auditors.

Changing/Closing Gift Card Program

To change information about a gift card program, the custodian will complete a Gift Card Authorization Request identifying the changes requested, attach a copy of the initial GC form, and submit to the campus controller's (finance) office at pcgc@ucdenver.edu

To close a gift card program, the custodian will contact the Finance Office providing a copy of the completed tracking log and receipts for a close out review.