

FLORIDA	OFFICIAL
POLYTECHNIC	UNIVERSITY
UNIVERSITY	POLICY

Subject/Title: Electronic Transfer of Funds
FPU Policy Number: FPU-7.0001P
<input type="checkbox"/> New Policy <input checked="" type="checkbox"/> Major Revision of Policy <input type="checkbox"/> Minor Technical Revision of Policy
Date First Adopted: August 26, 2014
Date Revised: September 11, 2019
Responsible Division/Department: Finance & Accounting
Initiating Authority: Mark Mroczkowski, VP & CFO

A. APPLICABILITY/ACCOUNTABILITY:

The Finance & Accounting office is responsible for the daily management of university bank balances and the general oversight of Electronic Funds Transfer (EFT) activity. This policy is applicable to EFTs, which are processed via wire transfer or the Automated Clearing House “ACH” through on-line banking software provided by the University’s banking partner.

B. POLICY STATEMENT:

This policy sets forth the procedures under which any funds under the University’s control are allowed to be moved by electronic transfer for any purpose including direct deposit, withdrawal, investment, or wire transfer. This policy is adopted pursuant to Florida Statutes section 1010.11 and sets forth the university’s written policies prescribing a system of accounting, internal controls, and operational procedures for the execution of EFTs.

C. DEFINITIONS:

- Electronic Funds Transfer (EFT) – The exchange or transfer of money electronically from one depositor to another. Examples of EFTs include Automated Clearing House (ACH) transfers and Wire transfers.
- Authorized Representative- The Chief Financial Officer (CFO) and any individuals designated in writing by the CFO to initiate, authorize, and record EFT transactions pursuant to this policy.
- ACH Transfer – A method of electronic funds transfer processed through the Automated Clearing House.
- Wire Transfer – A method of electronic funds transfer from one bank account to another.

D. PROCEDURES:

To promote the safety of University funds in the electronic funds transfer environment, the procedures to initiate and process EFTs are subject to the same financial policies, procedures, and controls that govern disbursement of University funds by any other means. These procedures are designed to safeguard the receipt and withdrawal of how all EFTs are initiated, approved, and executed to prevent loss of university funds arising from fraud, employee error, and misrepresentation by third parties.

1. The procedure to initiate, approve, and record an EFT payment is subject to the same financial policies, procedures, and controls that govern disbursements made by any other means.
2. EFT transactions will not be made without proper authorization of affected parties in accordance with federal and state law.
3. The University will, in writing, provide the names and titles of Authorized Representatives along with associated transfer limits to the disbursing bank. Any changes to the designated Authorized Representatives will be communicated in writing to the bank in a timely fashion.

4. All EFT payments will be initiated by secure computer-based systems except in extenuating circumstances in which that may not be possible. Phone transfers will not be used.
5. The mechanism by which EFT payment requests are communicated to the disbursing bank will have adequate controls to prevent unauthorized access to both the system and its various functionalities. These controls include password protected user accounts, Personal Identification Numbers (PINs), tokens, and a designated administrator.
6. The University Controller will designate a primary administrator to manage and control access to the systems used to process EFT transactions. The administrator shall ensure that adequate separation of duties exists in accordance with accepted internal control standards. In addition, the administrator shall ensure approval and maintenance of user system IDs, user permissions, including authorized representatives and their associated transfer limits.
7. A minimum of two Authorized Representatives is required to initiate, approve and record an EFT to the General Ledger.
8. Due to the reduced risk of EFT transfers between University bank accounts the Finance & Accounting Office may use EFTs on a routine basis to concentrate funds for payment and investment purposes. Although the risks are minimal for transfers between University accounts, reasonable controls should exist with regard to authorization, reconciliation, and review of these transactions.
9. The designated administrator will coordinate the establishment of templates for recurring EFT payments, which may not be altered without the approval of an Authorized Representative.
10. Bank activity will be monitored daily for unusual or unexpected transactions.
11. Reconciliation of bank activity to the General Ledger will be completed in a timely manner with all exceptions resolved.

POLICY APPROVAL	
Policy No.: FPU-7.0001P	
_____ Initiating Authority	_____ Date
_____ Policies & Procedures Review Committee Chair	_____ Date
_____ President/Designee	_____ Date
_____ Approved by FPU BOT, if required	_____ Date

**EXECUTED SIGNATURE PAGES ARE AVAILABLE IN THE
OFFICE OF THE GENERAL COUNSEL**