

TITLE: Procurement Card (P-Card) Policy | BILL Spend Compliance

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DISTRIBUTION: Southeastern University BILL Spend Users

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The BILL Spend Compliance Policy is designed to:

- support and provide a more efficient means of producing monthly financial statements
- reduce the number of payroll hours spent managing invalid and incomplete transactions
- encourage more fiscal responsibility at the department and project level

Cardholder

The BILL Spend cardholder is responsible for appropriately using the card and completing transactions in BILL Spend. Cardholders must adhere to all university procurement processes and policies when using the BILL Spend P-Card. P-Cards are SEU property and may not be transferred to, assigned to, or used by anyone other than the cardholder. SEU may suspend or cancel cardholder privileges at any time for any reason.

Cardholders must complete transactions on the same day as the purchase, including entering required details into the BILL Spend platform, attaching itemized receipts, and ensuring correct budget codes. If same-day completion is not feasible, these actions must be completed within 72 hours (three calendar days) from the purchase date. Transactions that are not completed within the 72-hour window are considered overdue.

Cardholders complete a transaction in BILL Spend by accomplishing the following actions:

1. Verify that the transaction is valid and not fraudulent activity.
2. Select the approved budget for the transaction.
3. Upload a valid receipt.
4. Assign a valid (active and assigned) general ledger account code (GL Account Code).
5. Split the transaction if sales tax was paid; assign the tax to the correct object code and select the state (or “International” if outside the U.S.).
6. Identify the sales tax amount and the state or foreign country where sales tax was applied.
7. Provide a business purpose that contains:
 - a. *Who* incurred the expense?
 - b. *What* type of activity, event, or purchase?
 - c. *Where* does the event or activity take place?
 - d. *When* does the activity or event take place?
 - e. *Why* was the expense incurred?
8. Provide attendee names when required.
9. Ensure the transaction is not a personal expense.

Approver

The BILL Spend P-Card approver is critical in identifying potential or actual misuse of the BILL Spend card. Vice Presidents and their delegated budget owners select their BILL Spend P-Card approver(s). Both the approver and the cardholder are equally responsible and accountable for transactions. Approvers should hold a budget owner or management role that reflects a clear reporting distinction from the cardholder within the organizational structure. This ensures objectivity and avoids any appearance of conflict of interest or undue influence in the approval process. Vice Presidents may delegate approver responsibilities to designated budget managers; however, as the ultimate budget owner, the Vice President remains responsible for oversight and compliance within their division.

Approvers must complete the review process within 120 hours (five calendar days) from the transaction date. Transactions not approved within the five-day window are considered overdue and may trigger additional compliance follow-up.

Approvers complete a transaction review in BILL Spend by accomplishing the following actions:

1. Confirm the transaction matches the uploaded receipt and any supporting documentation.
2. Evaluate the business purpose to ensure the expense is valid and supports SEU's mission and vision. This includes confirming:
 - a. Who incurred the expense?
 - b. What type of activity, event, or purchase?
 - c. Where does the event or activity take place?
 - d. When does the activity or event take place?
 - e. Why was the expense incurred?
3. Verify that the correct budget and GL Account Code are used.
4. Ensure the transaction is not a personal expense or otherwise unallowable.
5. Mark the transaction as approved in the BILL Spend platform.

Failure to meet the approver deadline may result in escalated monitoring, delayed reporting, or other corrective actions to ensure compliance.

Overdue Transactions

Overdue transactions are transactions yet to be completed or approved before the deadline, incomplete transactions exceeding three calendar days after clearing, or unapproved transactions exceeding five days. A financial impact has been established to encourage cardholders and approvers to meet the responsibilities and deadlines listed in this policy. The respective vice president's budget will be impacted using the following actions:

- **First Overdue Response:** An email notification instructing the cardholder to complete the overdue transaction or notifying the approver to approve the overdue transaction.
- **Second Overdue Response:** If the First Overdue Response has not been completed by the stated deadline, a Second Overdue Response generates an email notifying the cardholder and approver of a \$500 overdue fee assigned to the cardholder's respective Vice President budget using object code 67690 (P-Card Overdue Fee).

If multiple employees or approvers have overdue transactions, departments may be assessed a P-Card Overdue Fee multiple times within a budget cycle.

Fraudulent Transactions

Cardholders must install the BILL Spend App on their phone and activate the alert notifications. Cardholders must regularly approve transactions to monitor for fraudulent activity. If unauthorized activity appears, the cardholder must:

1. Dispute the transaction with BILL Spend.
2. Report the activity to the P-Card Office.
3. Complete the transaction, following P-Card Office instructions.

Annual BILL Spend Training

BILL Spend end users must participate in the annual BILL Spend training process. Training is maintained by taking the mandatory quiz. This activity should take approximately 20 minutes to complete, and a score of 85% is required to pass.

Keeping the Card Secure

P-Cards should be managed by the cardholder only and kept secure. Cardholders must report lost or stolen cards immediately to BILL Spend and the P-Card Office.