

# Policy #5.010

CBA Policy			
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	Office of State Travel	Effective Date:	9-5-14
	State Liability Travel Card and CBA Policy	Last Revision:	6-20-22

#### **PURPOSE**

To define the regulations and establish procedures for employees administering and utilizing Fletcher Technical Community College's (Fletcher) CBA account for allowed business travel expenses.

# **STATUTORY REFERENCE**

Fletcher's CBA Policy follows the State Liability Travel Card and CBA Policy issued by the State of Louisiana's Division of Administration, Office of State Travel.

### **GENERAL POLICY**

Fletcher has elected to participate in the State of Louisiana Liability Travel Card and CBA Program (Statewide Travel Program). Fletcher agrees to abide by the terms of the Statewide Travel Program unless a "Request for Exception" form is submitted and approved by the Office of State Travel.

Fletcher has chosen to only utilize one CBA account and will NOT issue travel cards to individual employees. The CBA account is a ghost account and no actual plastic card is issued. The CBA account is a tool used to assist Fletcher employees in paying for specific, higher cost travel expenses, incurred during travel for official state business. The CBA account is a Visa account issued by Bank of America for the State of Louisiana. The CBA account will enable Fletcher to purchase allowable, high dollar travel expenses on behalf of employees. Use of the CBA account is provided for official state business use only. The CBA account is a direct liability of the State of Louisiana. Fletcher is responsible for ensuring its account is paid timely and in full each month with ONE electronic funds transfer (EFT) to Bank of America.

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Fletcher allows a single purchase limit (SPL) up to \$5,000 and a monthly cycle limit (MCL) up to \$15,000 without prior approval from the Office of State Travel. These limits are preventative controls and should be used judiciously. The limits reflect Fletcher's travel patterns at this time and are monitored for required changes. Fletcher recognizes that certain business transactions require higher limits. The Office of State Travel must approve in writing on the "Request for Exception" form any SPL or MCL overrides. Transactions should never be artificially divided to avoid CBA Policy limits.

To allow for proper and complete travel program audits, Fletcher has implemented the use of WORKS Workflow, which is an online system through Bank of America. WORKS Workflow captures all transactions. WORKS Workflow requires both the CBA accountholder's and the approver's electronic signatures, along with the ability to maintain receipts and backup supporting documentation in one central location. All receipts and supporting documentation must be scanned and tied to the applicable transaction and not as one image for all transactions.

This CBA Policy, along with the use of the CBA account, do not negate any current requirements and/or allowances in PPM49, including the travel authorization/expense forms which must be completed for all travel. All Purchasing Policies, Rules and Regulations, Louisiana Statutes, Executive Orders, and/or the State Liability Travel Card and CBA Policy, as well as Fletcher's Travel Policy must be followed when using and administering the CBA account.

The Chancellor is responsible for designating the program administrator, approver, and CBA accountholder. The Chancellor must immediately notify the Office of State Travel of any changes. The Chancellor has designated the following:

- Primary Program Administrator Manager of Student Accounts & Grant Compliance
- Secondary Program Administrator Director of Accounting & Business Services
- Approver Vice Chancellor for Finance and Administration
- CBA Accountholder Executive Assistant to the VC for Finance and Administration

If the CBA account information is lost or stolen, immediately notify Bank of America at (888) 449-2273 and the program administrator.

#### **DEFINITIONS**

For the purpose of this policy, the following words have the meaning indicated.

1. Agreement Form - a form signed annually by the program administrator, approver, and CBA accountholder that acknowledges they have received required training from Fletcher, completed the state's certification requirement and received a passing score of at least 90, understands the travel policies and procedures of both Fletcher and the state, and accepts responsibility for compliance with all policies and procedures.

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- 2. Approver the CBA accountholder's supervisor or the most logical supervisor that is at least one level higher which would be most familiar with the business case and appropriate business needs for the CBA accountholder's transactions and is responsible for approving transactions online and signs both the CBA accountholder's billing cycle purchase log and monthly statement.
- 3. Billing Cycle the period of time between billings. Fletcher's CBA account closing period ends at midnight on the eighth (8<sup>th</sup>) of each month.
- 4. Billing Cycle Purchase Log printed from WORKS to document the online reconciliation process for travel expenses charged during the billing cycle. This log is printed and filed with the billing statement and the transaction documentation obtained from the merchant.
- 5. Card Abuse use of the card for non-approved state business purchases such as personal purchases.
- 6. Card Misuse use of the card for legitimate purchases but for goods or services that are prohibited by state and/or Fletcher policies.
- 7. CBA Accountholder a Fletcher employee who has been assigned as the accountholder/authorizer for the CBA account and is given authority to make purchases within preset limits on behalf of Fletcher. The CBA accountholder is a specific person assigned to a CBA account. Each CBA account must have only one CBA accountholder.
- 8. Controlled Billed Account (CBA) a credit account issued in Fletcher's name (no plastic card issued). This account is a direct liability of the State of Louisiana and is paid by Fletcher. The CBA account is controlled through a single, authorized CBA accountholder to provide means to purchase any allowed transactions/services allowed in the current State Liability Travel Card and CBA Policy. Although other travel related charges are now allowed on the CBA account, the traveler should be aware that there is no plastic card issued for a CBA account to ensure that this will not impair travel plans.
- 9. Cycle Limit maximum spending (dollar) limit the CBA account is authorized to charge in a billing cycle. This limit should reflect the CBA accountholder's purchasing patterns. This is a preventative control and, as such, should be used judiciously.
- 10. Department Head Fletcher's Chancellor.
- 11. Disputed Item any transaction that was double charged, charged an inaccurate amount, or charged without corresponding good or services by the CBA accountholder.
- 12. Electronic Funds Transfer (EFT) an electronic exchange or transfer of money from one account to another, either within the same financial institution or across multiple institutions.
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- 13. Electronic Signature an electronic sound, symbol, or process attached to or logically associated with a record or executed or adopted by a person with the intent to sign the record.
- 14. Fraud any transaction, intentionally made that was not authorized by the CBA accountholder or not for official state business.
- 15. Incidental Expense expenses incurred while traveling on official state business, which are not allowed, by the State Liability Travel Card and CBA Policy. Incidentals include but are not limited to, meals; fees and tips (to porters, baggage carriers, bellhops, hotel maids); transportation between places of lodging/airport such as taxi; phone calls and any other expense not allowed in the State Liability Travel Card and CBA Policy.
- 16. INTELLILINK Visa's web-based auditing tool which is used to assist with monitoring and managing Fletcher's card program usage to ensure that CBA account use conforms to all policies and procedures.
- 17. Merchant a business or other organization that may provide goods or services to a customer.
- 18. Merchant Category Code (MMC) a standard code the credit card industry uses to categorize merchants based on the type of goods or services provided by the merchant. A merchant is assigned an MCC by the acquiring bank.
- 19. Merchant Category Code Group (MCCG) a defined group of merchant category codes. MCCGs are used to control whether or not the CBA accountholder can make purchases from particular types of merchants.
- 20. Personal Purchases non-work related goods or services purchased solely for the benefit of the CBA accountholder, the CBA accountholder's family, or other individuals.
- 21. Policy Procedure Memorandum 49 (PPM49) the state's general travel regulations. These regulations apply to all state departments, boards and commissions created by the legislature or executive order and operating from funds appropriated, dedicated, or self-sustaining, federal funds, or funds generated from any other source. <a href="https://www.doa.la.gov/doa/ost/ppm-49-travel-guide/">https://www.doa.la.gov/doa/ost/ppm-49-travel-guide/</a>
- 22. Program Administrator a Fletcher employee responsible for administering and managing the State of Louisiana Travel Card and CBA Program at Fletcher and acts as the main contact between Fletcher and the issuing bank.
- 23. Receipt a merchant-produced original document that records the relevant details for each item purchased including quantities, amounts, a description of what was purchased, the total charge amount, and the merchant's name and address. Examples are sales receipts, original invoices,

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- packing slips, credit receipts, etc. This must match the online transaction amount and be matched to any other related documentation regarding the transaction.
- 24. Single Purchase Limit (SPL) the maximum spending (dollar) limit the CBA account is authorized to charge in a single transaction. The SPL limit may is \$5,000. Purchases shall not be split with the intent of and for the purpose of evading the single purchase limit. This is a preventative control and, as such, should be used judiciously.
- 25. Split Purchase a practice whereby a CBA accountholder or merchant splits a purchase into two or more transactions to circumvent either SPLs or bid requirements. This is prohibited by the State Liability Travel Card and CBA Policy.
- 26. State Program Administrator central point of contact responsible for managing and overseeing the State of Louisiana Travel Card and CBA Program.
- 27. Transaction a single purchase of good or services. A credit also constitutes a transaction.
- 28. Transaction Documentation all documents pertaining to a transaction, both paper and electronic. The documentation is also used for reconciliation at the end of the billing cycle and is to be retained with the monthly reconciliation documentation for review and audit purposes. Examples of transaction documentation include, but are not limited to: original itemized purchase receipts/invoices (with complete item descriptions, not generic such as "general merchandise), receiving documents, credits, disputes, written approvals, airline exceptions, justifications, approvals, travel authorizations, travel expense forms, etc.
- 29. WORKS Bank of America's web-based system used for program maintenance, card/CBA issuing/suspension/cancellation, and reporting.
- 30. WORKS Workflow Bank of America's online system that includes user profiles and transaction workflow.

#### OFFICE OF STATE TRAVEL RESPONSIBILITIES

The Office of State Travel is responsible for the statewide contract administration of the Statewide Travel Program. The state program administrator serves as the central point of contact to address all issues and changes necessary to the overall Statewide Travel Program and to coordinate such changes with Bank of America.

The Office of State Travel reviews and maintains Fletcher's CBA Policy. If the state's policy or the program limits change statewide, a revised State Liability Travel and CBA Policy will be issued by the Office of State Travel and Fletcher will revise its CBA Policy accordingly.

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The Office of State Travel approves Fletcher's participation in the Statewide Travel Program and identifies the allowable Merchant Category Codes (MCC) and their limits. MCC allowances are in accordance with Allowable CBA Account Transactions.

Any waiver to Fletcher's CBA Policy will be considered on a case-by-case basis by the Office of State Travel and should be documented in writing on a "Request for Exception" form. The "Request for Exception" form should be completed by Fletcher's program administrator and forwarded to the Office of State Travel for approval.

# FLETCHER TECHNICAL COMMUNITY COLLEGE RESPONSIBILITIES

# A. General Responsibilities

Fletcher is responsible for the administration of the Statewide Travel Program and ensuring compliance with all state and Fletcher policies, including but not limited to, PPM49, Purchasing Policies, Rules and Regulations, Louisiana Statutes, Executive Orders, the State Liability Travel Card and CBA Policy, and Fletcher's Travel Policy.

Fletcher is responsible for developing a CBA Policy that documents all internal procedures and is in accordance with the guidelines of the State Liability Travel Card and CBA Policy. Fletcher's CBA Policy will be updated as necessary to incorporate changes that may occur to Fletcher's internal procedures, the State Liability Travel Card and CBA Policy, and/or Bank of America.

Fletcher is responsible for keeping Fletcher employees informed of state and internal policy requirements, procedures, allowances, and updates. Fletcher is responsible for designating a program administrator and notifying the Office of State Travel of any changes.

Fletcher is responsible for performing post-audits of CBA accountholder transactions to monitor appropriate use while verifying purchases are made in accordance with PPM49, Purchasing Policies, Rules and Regulations, Louisiana Statutes, Executive Orders, the State Liability Travel Card and CBA Policy, and Fletcher's Travel Policy. Bank of America and Visa provide reporting capabilities at no cost to Fletcher to assist in identifying potential audit findings. Bank of America's WORKS data is available electronically for up to three (3) years. Visa's INTELLILINK data is available for a twenty-seven (27) month rotating period. It is Fletcher's responsibility to obtain and archive the data in both systems for seven (7) fiscal years.

Fletcher does not have an internal auditor. Fletcher is a member of the Louisiana Community and Technical College System (LCTCS). LCTCS does employ internal auditors that may audit Fletcher's CBA account. Copies of all audit reports completed by LCTCS internal auditors or the Louisiana Legislative Auditor will be provided to the Office of State Travel.

Internal controls have been developed and assigned as responsibilities of Fletcher's program administrator, approver, and CBA accountholder as described herein.

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### **B. Program Administrator Responsibilities**

The program administrators are the Manager of Student Accounts and Grant Compliance and the Executive Dean of Technical Education and serve as the main contact for all program personnel. The program administrators also serve as a liaison between Fletcher, the Office of State Travel, and Bank of America. The program administrators are responsible for coordinating, monitoring, and overseeing the program, ensuring that key controls are in place and operating as designed.

The program administrators responsibilities are:

- 1. Administer and comply with all state and Fletcher policies, including but not limited to, PPM49, Purchasing Policies, Rules and Regulations, Louisiana Statutes, Executive Orders, the State Liability Travel Card and CBA Policy, and Fletcher's Travel Policy.
- 2. Notify the Chancellor, approver, and CBA accountholder of any changes to the travel program.
- 3. Obtain required training and sign a "Program Administrator Agreement" form, annually, acknowledging responsibility for management of the travel card program.
- 4. Obtain annual program administrator certification through the state's online certification training program receiving a passing grade of at least 90.
- 5. Obtain annual signed agreement forms and certifications with a passing grade of at least 90 from the approver and CBA account cardholder.
- 6. Conduct training when an employee is initially given the responsibility of CBA accountholder or a new approver is assigned. This training should also be conducted annually to ensure that all program participants, such as program administrators, approvers, and CBA accountholders, are aware of all duties and responsibilities associated with the use of the CBA account. A signin sheet must be maintained to document the date of training as well as the roster of attendees.
- 7. Secure assigned WORKS user IDs and passwords. Never share user IDs and passwords and/or leave work area while logged into WORKS or leave log-in information lying in an unsecure area. Ensure that only business email addresses are used in WORKS.
- 8. Do not include the full CBA account number in emails, fax, reports, memos, etc. If an account number is necessary, only the use of the last four or eight digits of the account number is allowed. The full CBA account number may be used for hotel bookings when necessary. In the event that using the full CBA account number is necessary to secure hotel reservations, caution should be exercised to endure that the full CBA account number is used in a secure environment with a valid hotel.

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- 9. Submit requests for exceptions to the Office of State Travel as necessary.
- 10. Immediately notify Bank of America if the CBA account information is lost, stolen, or has fraudulent charges.
- 11. Ensure the reconciliation of the billing statement and the transaction documentation is complete and payments are made by Fletcher in full, timely each month, with one EFT to Bank of America. PERSONAL PAYMENTS SHOULD NEVER BE MADE DIRECTLY TO BANK OF AMERICA.
- 12. Perform monthly audits by running the required reports in WORKS and INTELLILINK. The audit reports, along with all documentation/findings, must be filed in a central location (Fletcher's Business Office file room) and be readily available for any internal or external audits.
- 13. Submit monthly certifications to the Office of State Travel verifying that the required audit reports have been generated and any findings have been investigated, documented, and handled appropriately.
- 14. Review annually, along with the approver and Chancellor, that the CBA accountholder's delegated approver is one level higher than the CBA accountholder and review profile limits to ensure appropriate utilization of the CBA account and program intent. This will ensure that all card limits, MCC codes, etc., are working properly. If limits or codes are not allowing the CBA accountholder to perform his/her duties, then the approver should contact the program administrator to make necessary adjustments. A file of the annual reviews will be maintained in one central location (Fletcher's Business Office file room).

### C. Approver Responsibilities

The approver is the Vice Chancellor for Finance and Administration and is responsible for reviewing all transactions of the CBA accountholder to ensure transactions are legitimate business expenses and in are compliance with all state and Fletcher policies, including but not limited to, PPM49, Purchasing Policies, Rules and Regulations, Louisiana Statutes, Executive Orders, the State Liability Travel Card and CBA Policy, and Fletcher's Travel Policy.

If the approver is on extended leave during the monthly approval process, it is the approver's and CBA accountholder's responsibilities to inform the program administrator of the absence. The program administrator will appoint a temporary approver and notify the temporary approver of their responsibilities. The original approver will resume all duties once returned from absence.

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# The approver's responsibilities are:

- 1. Review, understand, and comply with all state and Fletcher policies, including but not limited to, PPM49, Purchasing Policies, Rules and Regulations, Louisiana Statutes, Executive Orders, the State Liability Travel Card and CBA Policy, and Fletcher's Travel Policy.
- 2. Keep well informed of program updates as sent from the program administrator or anyone associated with the travel program.
- 3. Obtain state and Fletcher required training and sign an "Approver Agreement" form, annually, acknowledging the approver's responsibilities, with originals given to the program administrator along with the approver receiving a copy.
- 4. Obtain annual approver certification through the state's online certification training program receiving a passing grade of at least 90.
- 5. Secure assigned WORKS user IDs and passwords. Never share user IDs and passwords and/or leave the work area while logged into WORKS or leave log-in information lying in an unsecure area.
- 6. Electronically approve each transaction in WORKS Workflow only after reviewing and ensuring that each transaction, to the best of the approver's knowledge:
  - Has an appropriate business purpose, fits Fletcher's business needs, and is audited including a review of all supporting documentation.
  - Complies with all current state and Fletcher policies, including but not limited to, PPM49, Purchasing Policies, Rules and Regulations, Louisiana Statutes, Executive Orders, the State Liability Travel Card and CBA Policy, and Fletcher's Travel Policy.
  - Does not include state sales tax for transactions at Louisiana hotels, Louisiana Enterprise Rent-A-Car locations, and Park N Fly (New Orleans Airport location only).
  - Includes all required and complete documentation, including a detailed receipt, supporting the transaction and all documentation is scanned into WORKS Workflow and tied to the appropriate transactions.
  - Is not a duplication of personal request and/or reimbursements.
  - Has been verified to ensure that each transaction has a receipt and the receipt's date, supporting documentation and documentation dates, along with the billing cycle purchase log dates, correspond with known business needs or trip allowances and dates, if applicable and travel has been approved, along with program cycle dates (which begin the ninth (9<sup>th</sup>) of one month and ends the eighth (8<sup>th</sup>) of the following month).
  - Has been coded properly for payments.
- 7. Ensure that a billing cycle purchase log is completed by the CBA accountholder, that the log corresponds with the monthly billing statement, and that the log and statement are signed by both the approver and the CBA accountholder.

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- 8. Ensure that supporting documentation, including the approved electronic billing cycle purchase log and signed statement, by both the approver and the CBA accountholder, along with any findings and justifications are sent to the program administrator for review, where the documentation will be maintained in one central location (Fletcher's Business Office file room), in accordance with the state's requirements.
- 9. Ensure that CBA accountholder is never a final approver of his/her own monthly transactions.
- 10. Immediately report any fraud or misuse, whether actual, suspected, or personal charges to the program administrator, as well as, the Chancellor and other personnel/agencies as required. The approver will participate in any disciplinary actions, which may be deemed appropriate, if necessary.
- 11. Notify the program administrator, immediately, upon separation, change in department/section, or during extended leave for the CBA accountholder must be a supervisor of the CBA accountholder at least one level higher than the CBA accountholder. The approver must be the most logical supervisor that would be most familiar with the business needs for the CBA account transactions.
- 12. Notify the program administrator if the CBA account has been dormant for more than twelve (12) months and have it cancelled. The CBA accountholder must be notified prior to cancellation. Exceptions may be granted by submitting justification to the Office of State Travel stating the reason the CBA account should not be cancelled. If approval is granted, the CBA account must be placed in a suspended profile and changed to a \$1 limit until further needed for activation.
- 13. Complete an exit review, with the CBA accountholder, of the CBA accountholder's transactions, supporting documentation and receipts, as well as, obtaining necessary signatures prior to departure of the CBA accountholder.
- 14. Ensure that either the approver or the CBA accountholder notifies the program administrator if the CBA account information is lost, stolen, or has fraudulent charges. Ensure the CBA accountholder immediately notifies Bank of America as well.
- 15. Review annually, along with the program administrator and Chancellor, that the CBA accountholder's delegated approver is one level higher than the CBA accountholder and review profile limits to ensure appropriate utilization of the CBA account and program intent. This will ensure that all card limits, MCC codes, etc., are working properly. If limits or codes are not allowing the CBA accountholder to perform his/her duties, then the approver should contact the program administrator to make necessary adjustments. A file of the annual reviews will be maintained in one central location (Fletcher's Business Office file room).

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- 16. Understand that failure to properly fulfill the approver's responsibilities could result, at a minimum, in the following:
  - Written counseling which would be placed in the employee's file for a minimum of twelve (12) months.
  - Consultation with the program administrator, and possibly the Chancellor.
  - Disciplinary actions, up to and including termination of employment.
  - Legal actions, as allowed by the fullest extent of the law.

### D. CBA Accountholder Responsibilities

Fletcher has one (1) CBA account. The CBA accountholder is the Manager of Purchasing and Travel and is responsible for managing the use of the CBA account. The CBA account is used for all allowable travel expenditures as listed in Allowable CBA Account Transactions. Should the need arise, the program administrator may establish a new and/or additional CBA account through Bank of America.

The CBA accountholder's responsibilities are:

- 1. Use the CBA account for official state business travel only. No personal use is allowed for any reason. The CBA account number should not be loaned or given to another person to pay for official or non-official travel expenses.
- 2. Review, understand, and comply with all state and Fletcher policies, including but not limited to, PPM49, Purchasing Policies, Rules and Regulations, Louisiana Statutes, Executive Orders, the State Liability Travel Card and CBA Policy, and Fletcher's Travel Policy.
- 3. Keep well informed of program updates as sent from the program administrator or anyone associated with the travel program.
- 4. Obtain state and Fletcher required training and sign a "Cardholder Agreement" form, annually, acknowledging the CBA accountholder's responsibilities prior to receiving the CBA account, with originals given to the program administrator along with the CBA accountholder receiving a copy.
- 5. Obtain annual cardholder certification through the state's online certification training program receiving a passing grade of at least 90.
- Secure assigned WORKS user IDs and passwords. Never share user IDs and passwords and/or leave the work area while logged into WORKS or leave log-in information lying in an unsecure area.
- 7. Do not include the full CBA account number in emails, fax, reports, memos, etc. If an account number is necessary, only the use of the last four or eight digits of the account number is

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- allowed. The full CBA account number may be used for hotel bookings when necessary. In the event that using the full CBA account number is necessary to secure hotel reservations, caution should be exercised to endure that the full CBA account number is used in a secure environment with a valid hotel.
- 8. Recognize that the CBA account is the property of the State of Louisiana and the CBA accountholder is responsible for the security and control of the CBA account and its appropriate use. The CBA accountholder is responsible for maintaining the security of card data such as the account number, the expiration date, and the card verification value (CVV), the three-digit security code.
- 9. Inform travelers that a personal credit card must be presented when checking into a hotel to cover any incidental expenses, which are not allowed, if using the CBA account to pay for hotel room charges. If incidentals are incurred during a business trip, travelers must be reimbursed through Fletcher's travel policy and procedures.
- 10. Never, under any circumstances, use the CBA account to access or attempt to access cash.
- 11. Never accept cash in lieu of a credit to the CBA account.
- 12. Never use the CBA account for incidentals.
- 13. Never use the CBA account for gift cards/gift certificates, without prior approval from the Office of State Travel, as they are considered cash and taxable.
- 14. Never use the CBA to avoid procurement or payment procedures.
- 15. Never use the CBA account for the purchase of alcohol, food, or entertainment services.
- 16. Never use the CBA account for purchases via online accounts such as Amazon, PayPal, eBay, etc. The only exception is for conference registration fees that are paid through an online site. The account must be a standalone business account and must not be combined with an individual's personal account.
- 17. Never use the CBA account for fuel or vehicle maintenance since Fletcher is part of the Fuel Card and Maintenance Program.
- 18. Consult with the program administrator, prior to processing any transactions that include convenience fees, to discuss the appropriateness of the additional fee. The CBA accountholder must submit a request in writing to the program administrator justifying the need to make the purchase with the CBA account. The program administrator will then determine if the convenience fee complies with Visa regulations and is in the best interest of Fletcher. Only after this process will a convenience fee be allowable.

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- 19. Remind employees to make every effort to possible to prevent being charged state sales tax and to present the proper tax exemption forms while traveling on official state business. Employees traveling on official state business are state sales tax exempt at all Louisiana hotels, Louisiana Enterprise Rent-A-Car locations, and Park N Fly (New Orleans Airport location only) along with New Orleans Airport surface lot and Economy Garage.
- 20. Any non-permitted purchases, overages, incidentals, or unauthorized tax incurred by an employee while traveling on official state business will be owed back to Fletcher by withholding the amount from the employee's travel expense reimbursement request. If the employee does not submit a travel expense reimbursement request related to the not allowed transaction, the employee must make a payment to the Business Office. If the employee does not resolve the matter within two pay periods, the amount will be deducted from the employee's paycheck.
- 21. Only use the CBA account for allowable travel expenditures accompanied by an approved "Chrome River Pre-Approval" form.
- 22. Reconcile the monthly billing statement in a timely manner to ensure prompt payment to Bank of America.
- 23. Audit travel expense reimbursement requests to ensure that a reimbursement is not issued to an employee if a purchase was made with the CBA account.
- 24. Submit all required transaction documentation (both paper and un-editable electronic format), special approvals, etc., timely. Every transaction must have a receipt with a full description, not a generic description such as "general merchandise" or item should be fully documented/described elsewhere (both paper and un-editable electronic format). Failure to do so should result in cancellation of the CBA account. Appropriate paper supporting documentation, including the approved electronic billing cycle purchase log, along with any findings and justifications is scanned into WORKS Workflow and tied to each applicable transaction. Cardholders must upload and attach a copy of the invoice or receipt and any other relevant documentation (e.g. email correspondence) to the applicable single transaction in WORKS Workflow and not one upload for multiple transactions. Other relevant documentation will include Chrome River Pre-Approval pages, as applicable, For a conference, the supporting documentation should include the conference hotel, agenda, dates and conference lodging rates. The billing cycle purchase log is an un-editable, PDF, formatted report. The WORKS Workflow data is generated at the time of the report request with the most current signoff information with the date and time stamp of the approval captured in the audit tracking along with all documentation which has been scanned to support the CBA account transactions and tied to the appropriate transaction. Ensure that the correct cycle period/dates are entered when printing the report. Cycle dates for the program begin on the ninth (9<sup>th</sup>) of one month and ends on the eighth (8<sup>th</sup>) of the following month. All mentioned above, must be sent to the approver for required audit and signatures, and forwarded to the

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- program administrator for review and file maintenance in one central location (Fletcher's Business Office file room).
- 25. Payments to Bank of America should be made only by Fletcher once all approvals have been obtained. PERSONAL PAYMENTS SHOULD NEVER BE MADE DIRECTLY TO BANK OF AMERICA.
- 26. Immediately notify Bank of America if the CBA account information is lost or stolen and then also notify the program administrator.
- 27. Notify the program administrator if fraudulent charges are noticed, as the CBA account may need to be cancelled and another CBA account issued.
- 28. Notify the program administrator if use of the CBA account has changed and lower or higher limits are necessary.
- 29. Notify the program administrator if the CBA accountholder plans any extended leave that may affect usage of the CBA account. The program administrator may appoint a temporary CBA accountholder and notify the temporary CBA accountholder of their responsibilities. The original CBA accountholder will resume all duties once returned from absence.
- 30. Notify the program administrator of an extended absence of the approver.
- 31. Agrees to reimbursement of unauthorized charges by personal check or payroll deduction.
- 32. Makes purchases for which the CBA accountholder has been authorized to spend and does not exceed the SPL.
- 33. CBA account declines due to exceeding monthly or SPL limit may result in cancellation of the CBA account.
- 34. The CBA account cardholder's business email address must match the CBA accountholder's name.
- 35. Understand that failure to properly fulfill the CBA accountholder's responsibilities could result, at a minimum, in the following:
  - Written counseling which would be placed in the employee's file for a minimum of twelve (12) months.
  - Consultation with the program administrator, and possibly the Chancellor.
  - Disciplinary actions, up to and including termination of employment.
  - Legal actions, as allowed by the fullest extent of the law.

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# ALLOWABLE CBA ACCOUNT TRANSACTIONS

The CBA account can only be used to purchase the following:

- Airfare,
- State contracted travel agency fees,
- Registration for conferences/workshops the CBA account may not be used for membership dues,
- Hotel/lodging,
- Rental car,
- Parking only with hotel stay and combined on invoice and Park N Fly,
- Internet services only with hotel stay and combined on invoice,
- Gasoline for rental car/state owned car only in the event that the Fuel Card and Maintenance Program is not covered in a certain area and the file must be completely documented.
- Shuttle service only when pre-paid prior to trip. Cannot be used for individual ground transportation during a business trip such as taxi, bus, etc. without approval from Office of State Travel.
- Convenience fees many merchants charge fees that do not comply with Visa's rules and the total of these fees may exceed what Fletcher receives from the Statewide Travel Program rebate. Therefore, convenience fees are only allowable when justified in writing, they comply with Visa regulations, and are in the best interest of Fletcher.

### **RECONCILIATION PROCEDURES**

Procedures and controls are in place for prompt payment, reconciliation, and cost distribution of charges and credits. Post audits of the CBA accountholder transactions will be performed to monitor the number and dollar amount of purchases made, merchant used, and detailed transaction information to properly allocate the cost.

- 1. The monthly paper billing statements from Bank of America will be mailed directly to the CBA accountholder at the business address. The CBA accountholder must reconcile purchases made during the billing cycle by matching the billing statement to the electronic billing cycle purchase log, along with the CBA accountholder's supporting documentation (receipts). The documentation will be reviewed and certified by the CBA accountholder as received or reported as a disputed item if the receipt does not match the transaction online information. The CBA accountholder shall allocate the expense to the appropriate budget categories and sign off electronically in WORKS Workflow on each transaction by the eighth (8<sup>th</sup>) of the month. This information will be queued for the approver's review and approval.
  - If supporting documentation is lost and a duplicate receipt cannot be obtained from the merchant, a "Missing Receipt" form must be completed and filed in the CBA accountholder's files.
  - If a charge or credit does not appear on the statement within 60 days after the original charge or credit was made, the CBA accountholder must notify the program administrator.
  - Incorrect charges are disputed online in WORKS.

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2. The approver must review the information in WORKS Workflow, along with the documentation submitted by the CBA accountholder. The approver must verify that acceptable documentation exists (including line item description, price, and coding) to support each purchase and/or credit, verify that purchases are for official state business, and that purchases comply with appropriate rules and regulations. The approver shall approve the billing cycle purchase log by signing off in WORKS Workflow to certify his/her review and approval. The CBA accountholder shall not, and cannot, approve his/her own monthly billing cycle purchase log in WORKS. This log must be reviewed and approved by the approver for the previous billing cycle by the fourteenth (14<sup>th</sup>) of the month.

Once approved, the CBA accountholder shall print a copy of the billing cycle purchase log to file with the billing statement and transaction documentation. This log will document the electronic approvals.

If the approver determines that personal or unauthorized charges are made on the CBA account, the transaction is "flagged" in WORKS Workflow, which returns it to the CBA accountholder, with a comment, for resolution. If repeated issues occur, appropriate steps shall be taken to resolve the misuse/abuse of the card. When an unapproved item was purchased and it is discovered during review, the item should be returned for a credit memo. If the item is nonrefundable, the CBA account cardholder must reimburse Fletcher for this purchase.

- 3. If the CBA accountholder's transactions are not signed off timely, the card balance will not be fully refreshed to the full monthly credit limit until all transactions are completed (signed-off) for all previous cycles.
- 4. All supporting documentation, including the approved electronic billing cycle purchase log and signed statement, by both the CBA accountholder and the approver, along with any findings and justifications, must then be forwarded to the program administrator for review and maintenance of the files on one central location (Fletcher's Business Office file room). Once all approvals and audits have been obtained and forwarded to the program administrator, the program administrator must review receipts to correct any necessary coding changes.
- 5. Once all approvals are received, all supporting documentation is reviewed, and the monthly billing statement is reconciled, the Business Office will process for EFT payment to Bank of America.

### **CBA ACCOUNT MISUSE**

1. A fraudulent purchase is any use of the CBA account which is determined to be an intentional attempt to defraud the state for personal gain or for the personal gain of others.

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An employee suspected of having misused the CBA account with the intent to defraud the state will be subjected to an investigation. Should the investigation result in findings, which show that the actions of the employee have caused impairment to state service, and should those findings be sufficient to support such action, the employee will be subject to disciplinary action. The nature of the disciplinary action will be at the discretion of the Chancellor and will be based on the investigation findings and the record of the employee. Any such investigation and ensuing action shall be reported to the Legislative Auditor, the Office of Inspector General, and the Office of State Travel.

Any recognized or suspected abuse of the CBA account should be reported immediately to the program administrator and may be anonymously reported to the State of Louisiana Inspector General's Fraud and Abuse Hotline at (866) 801-2549.

In the event of a fraudulent charge, the CBA accountholder shall complete the following steps:

- Contact Bank of America's Security Division at (877) 451-4602.
- Sign and return the affidavit provided by Bank of America.
- Notify the program administrator of the fraudulent charge.
- Submit a copy of the fraudulent charge affidavit to the program administrator.
- Indicate the fraudulent charge in the comment section of the transaction during online reconciliation in WORKS Workflow.
- 2. A non-approved purchase is a purchase made by the CBA accountholder for whom payment by the state is unapproved. A non-approved purchase differs from a fraudulent purchase in that it is a non-intentional misuse of the CBA account with no intent to deceive the state for personal gain or for the personal gain of others.

A non-approved purchase is generally the result of a miscommunication between an approver and the CBA account cardholder. A non-approved purchase could occur when the CBA account cardholder mistakenly uses the CBA account rather than a personal card.

When a non-approved purchase occurs, the CBA account cardholder should be counseled to use more care in handling of the CBA account. The counseling should be in writing and maintained in the employee's file for no longer than one year unless another incident occurs. The employee shall pay for the item purchased inappropriately. Should another incident of a non-approved purchase occur within a twelve (12) month period, the Chancellor should consider revocation of the CBA account.

- 3. A merchant forced transaction can occur in rare instances. Commercial accounts are accepted by a variety of merchants that process transactions only if approved by the issuing bank thereby abiding by the account controls in place. Merchant transactions are processed using one of the two steps as follows:
  - a. Merchants process transactions against account controls (MCC, limits, expiration date, etc.) and, if approved, receive an authorization number.

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- b. Merchants submit the transactions for payment from Bank of America.
  - Merchants, in rare instances, will circumvent the authorization process and only perform step b. This means that the merchant did not process the transaction against the account controls and therefore did not receive an authorization number.
  - If this happens, the merchant has forfeited all dispute rights and the transaction can be disputed and unless the merchant can provide a valid authorization number, the dispute will be resolved in the CBA account cardholder's favor.
- 4. If a merchant advises the CBA account approval has been denied, it is more likely a violation of one of the levels of authority checks listed:
  - The purchase exceeds the SPL.
  - The CBA account is over the MCL.
  - The purchase is a violation of a MCCG.

The merchant will not have information related to the reason for denial. If a transaction is denied, the CBA accountholder should contact the program administrator for support. The program administrator will contact Bank of America to obtain information on the denial. If a transactions declines, the CBA accountholder should not try to complete the transaction again and the merchant should be advised not to attempt to process the transaction until the situation is rectified.

- 5. The CBA accountholder, approver, and program administrator, are responsible for the security of the CBA account, WORKS user IDs and passwords, and therefore should:
  - Never display their account numbers, WORKS user IDs and passwords around their work areas.
  - Never share WORKS user IDs and passwords and/or leave work areas while logged into WORKS or leave log-in information lying in unsecure areas.
  - Never give the CBA account number, User IDs, or passwords to someone else.
  - Never email the full account number, User IDs, or passwords under any circumstances.
- 6. The consequences of card misuse include the following:
  - Suspension/cancellation of the CBA account.
  - Written counseling, which would be placed in employee file for a minimum of twelve (12) months.
  - Consultation with the program administrator and possibly the Chancellor.
  - Disciplinary actions, up to and including termination of employment.
  - Legal actions, as allowed by the fullest extent of the law.

### STATE SALES TAX

The CBA account charges are a direct liability of the State of Louisiana; therefore, state sales tax should never be charged on CBA account purchases, especially for Louisiana hotels, Louisiana Enterprise Rent-A-Car locations, and Park N Fly (New Orleans Airport location only). The CBA accountholder will remind employees to make every effort to possible to prevent being charged

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state sales tax and to present the proper tax exemption forms while traveling on official state business. To have state sales tax exempted, employees must:

- 1. Louisiana hotels present the Louisiana Department of Revenue's Governmental Employees Hotel Lodging Sales/Use Tax Exemption Certificate to the hotel front desk upon check-in. The employee should review the receipt to ensure state sales tax is not charged. The CBA accountholder will provide this certificate to the employee traveling on official state business.
- 2. Louisiana Enterprise Rent-A-Car locations present the Louisiana Department of Revenue's State of Louisiana Employee Travel Expense Limited Sales Tax Exemption Certificate Governmental Employees Hotel Lodging Sales/Use Tax Exemption Certificate to the Enterprise Rent-A-Car location's front desk upon check-in. The CBA accountholder will provide this certificate to the employee traveling on official state business.
- 3. Park N Fly (New Orleans Airport location only) If the online reservation system is used, enter promotion code '0050930'. If the reservation system is not used, employees must present the Louisiana Department of Revenue's State of Louisiana Employee Travel Expense Limited Sales Tax Exemption Certificate Governmental Employees Hotel Lodging Sales/Use Tax Exemption Certificate to Park N Fly (New Orleans Airport location only) upon check-in. The CBA accountholder will provide this certificate to the employee traveling on official state business

If unauthorized tax is incurred by an employee while traveling on official state business, the tax will be owed back to Fletcher by withholding the amount from the employee's travel expense reimbursement request. If the employee does not submit a travel expense reimbursement request related to the not allowed transaction, the employee must make a payment to the Business Office. If the employee does not resolve the matter within two pay periods, the amount will be deducted from the employee's paycheck.

### **DOCUMENTATION**

Documentation must be adequate and sufficient to adhere to all state and Fletcher policies, including but not limited to, PPM49, Purchasing Policies, Rules and Regulations, Louisiana Statutes, Executive Orders, the State Liability Travel Card and CBA Policy, and Fletcher's Travel Policy.

1. Fletcher must ensure that all supporting documentation along with receipts are scanned and attached to each corresponding transaction in WORKS Workflow. Fletcher should ensure that the approver is verifying and ensuring that these controls are being met and that transactions are appropriate, accurate, have a business case and business need for the purchase, all receipt dates and other supporting documentation dates are applicable with known need or business travel, and approved. Documentation of approval must be accomplished electronically online by signing off on the transaction in WORKS Workflow. Approval by the approver certifies that the documentation is acceptable for each transaction that it was for official state business,

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that it is in compliance with appropriate rules and regulations, etc., as mentioned above and that it has been reviewed and is approved.

- 2. Documentation is required for all purchases and credits. The CBA accountholder should obtain the customer copy of the receipt. For items such as registrations, where the merchant does not normally generate a receipt or packing slip, a copy of the ordering document may be used. Acceptable documentation must include a line description, with full description not a generic "general merchandise" description, and line item pricing for the purchase. Electronic receipts are allowed if they are un-editable and are maintained in compliance with Fletcher's records retention policy.
- 3. For internet purchases, the CBA accountholder should obtain the print out of the order confirmation showing the details, or the printout of the transaction details, or the shipping document if it shows what was purchased, the quantity and the price paid.
- 4. The approver and CBA accountholder are issued unique WORKS user IDs and passwords. The approver is to use his/her unique WORKS user ID and password to verify and electronically signoff on each transaction. Audit trails exist with the WORKS system with date and time stamps for sign-offs and approvals.
- 5. The approver will forward all supporting documentation along with invoices, receipts, and the approved electronic billing cycle purchase log, by both the CBA accountholder and the approver, and signed statement, by both the CBA accountholder and the approver, and any findings and justifications to the program administrator for review and for maintenance of the files in accordance with Fletcher's records retention policy. This file must be centrally located (Fletcher's Business Office file room) and will be subject to review by the Office of State Travel, the Legislative Auditor, and any other duly authorized auditor.
- 6. All WORKS entries and scanned supporting documentation, when utilizing WORKS Workflow and electronic approvals are maintained electronically within the WORKS online system for up to three (3) years. Visa's INTELLILINK data is available for a twenty-seven (27) month rotating period. It is Fletcher's responsibility to obtain and archive the data in both systems for seven (7) fiscal years.

## **DISPUTE RESOLUTION**

In the event that the CBA accountholder finds items on the monthly billing statement that do not correlate with retained receipts and supporting documentation, transactions not made by the CBA accountholder, incorrect transaction amounts, or if there is an issue with service or quality, the CBA accountholder should proceed as follows:

1. The CBA accountholder's first recourse is to contact the merchant to try to resolve problems regarding disputed items, charges, or quality.

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- 2. If the merchant agrees an error has been made, it will credit the CBA account. The credit will appear on the next monthly billing statement. The CBA accountholder should check the next statement for the credit.
- 3. If the problem with the merchant is not resolved, the Statement of Disputed Item must be completed and mailed or faxed with required enclosures within sixty (60) days from the billing close date (eighth (8<sup>th</sup>) of each month) to:

Bank of America-Commercial Card Service Operation Post Office Box 53142 Phoenix, AZ 85072-3142 Phone: (800) 352-4027

Fax: (888) 678-6046

A copy of the dispute form should be forwarded to the program administrator.

- 4. The transaction will be paid; therefore, it is important for the CBA accountholder to mark the online WORKS Workflow transaction as "DISPUTED." The CBA accountholder should retain a copy of the disputed documentation and verify receipt of the credit on future statements.
- 4. All disputes will be resolved by Bank of America within 180 days.
- 5. Sales tax is not a disputable item. It is the responsibility of the CBA accountholder to handle accordingly.

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# **POLICY ACKOWLEDGEMENT**

The Chancellor, program administrator, approver, and CBA accountholder, by signing this CBA Policy dated December 8,2022 acknowledge and accept responsibilities related to this program as outlined herein signed by:

Eristine Strickland

Kristine Strickland, Ph.D.

Chancellor

Janet Michat

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Janet Michot

Manager of Student Accounts & Grant Compliance Primary Program Administrator

Tracy Carmichael

Tracy Carmichael

Director of Accounting and Business Services Secondary Program Administrator

DocuSigned by:

Mark McLean

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Mark McLean

Vice Chancellor for Finance and Administration Approver

Elizabeth Trahan

Elizabeth Trahan

Executive Assistant, Interim Travel Manager

CBA Accountholder

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