

SOPP # DOF-GSA-2020-01	<u>Prepared By:</u> Credit Card and Travel Compliance Division
<u>Effective Date:</u> 10/1/2026	<u>Approved By:</u> Kevin McCurdy / Commissioner of Finance
Title	GSA Credit Card Management
Purpose	Pursuant to Act No. 8309, this SOPP establishes internal controls, approval requirements, documentation standards, and monitoring procedures governing all GVI GSA credit cards. This policy ensures fiscal accountability, prevents misuse, and enforces compliance with GVI travel and procurement requirements, GVIBuy and ERP procedures, and Department of Finance directives.
Scope	This SOPP applies to all Executive Branch agencies and individuals participating in the GVI GSA Credit Card Program. The card may be used only for official government business, approved emergencies, and urgent operational needs when GVIBuy, the Government's primary procurement system, cannot reasonably be used. All statements must be processed through ERP Straight Pay, and all card activity must comply with applicable GVI and Department of Finance requirements.
Definitions	Emergency or Urgent Purchase: An unanticipated, time-sensitive purchase necessary to protect life or property or prevent a disruption of essential government operations when GVIBuy cannot reasonably be used. Approved Vendor: A vendor authorized through GVIBuy or otherwise approved by the Department of Finance for official or emergency use. Prior Written Approval: Written authorization issued by the appropriate approving authority before a purchase or transaction is made. Approval obtained after a transaction does not constitute prior approval.
Eligibility	<u>Eligible Positions</u> • Governor / Lieutenant Governor • Commissioner and Assistant Commissioners • Agency Chiefs of Staff • Directors and Fiscal Officers • Deputy Directors / Deputy Commissioners (authorized by the Commissioner of Finance) Note: Eligibility does not guarantee approval. Agencies are limited to two cards, and boards and commissions are ineligible unless otherwise authorized in writing by the Commissioner of Finance or the Governor, as applicable.

Definitions / Roles	<u>Cardholder</u> • Safeguards card and credentials and uses card only for authorized business. • Submits receipts, ensures ERP entry within ten business days <u>Reconciler of Account</u> • Reviews statements and matches receipts. • Verifies ERP coding, funding, and expenditure object codes. • Completes reconciliation within 10 business days of statement availability. <u>Certifying Officer</u> • Confirms funding availability <u>Compliance Officer / Program Administrator</u> • Oversees program operations, card profiles, and restrictions • Conducts compliance reviews and maintains violation log • Issues account suspension for noncompliance <u>Segregation of Duties</u> • No individual may perform conflicting roles for the same account unless authorized in writing by the Commissioner of Finance. Note: Cardholder and Reconciler's should contact DOF only for matter that cannot be resolved at the agency level.
Card Application, Training, and Payment	<u>Requirements</u> • Submit DOF-GSA Form #1 and justification letter confirming available funding • DOF will review and approve or deny the request. • Complete all required role-based U.S. Bank training and submit certificates to DOF within 30 days of approval: ▪ Cardholder Basics, Approver Basics ▪ Cardholder Transaction Management ▪ Mitigate Fraud and Misuse • Failure to submit the required training certificates will result in cancellation of the request. • Upon completion, DOF will issue the card with the approved credit limit. • Use the card only for authorized purchases and retain all required documentation. • Reconcile the monthly statement and submit the complete ERP Straight Pay package to the DOF queue within 10 business days of statement availability.

Card Administration, Incident Reporting and Personnel Changes	<u>Late Payment Enforcement</u> • First late payment: Account suspension through the next cycle. • Second late payment within 12 months: Account termination and referral to the Commissioner of Finance. Note: A suspended account may be reactivated only after all payments, documentation, reimbursements, and corrective actions are completed. <u>Lost or Stolen Cards</u> • Report immediately to the Department of Finance during business hours • After hours, contact U.S. Bank at 1-877-887-9260 <u>Fraud and Disputes</u> • Report suspected fraud or disputed charges to DOF and U.S. Bank within two business days of discovery or notification. <u>Lost Receipts</u> • A duplicate receipt or notarized affidavit is required for all lost receipts. • First and second occurrences within a quarter: Written warning. • Third occurrence within a quarter: Account suspension pending review. Department of Finance must be notified: • Within one (1) business day of employee separation • Within five (5) business days of duty changes, promotions, or authorization changes. Note: Upon separation, reassignment, or loss of eligibility, the credit card will be immediately suspended, and no further purchases are permitted. All outstanding transactions must be reconciled, and the card must be returned within the timeframe established by DOF.
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Prohibited and Restricted Purchases	Note: The GSA Credit Card shall not be used for the following purchases unless specifically identified as requiring prior written approval: <u>Prohibited Purchases</u> • Non-official meals, tips, gratuities, and incidental charges • Cash or travel advances, per diem, reimbursements, stipends, or substituted compensation • Individual meals are prohibited unless the cardholder is on approved official business travel, receives no per diem or meal allowance, and obtains prior written approval. Approved meal charges may not exceed the applicable daily meal allowance. Meals purchased while conducting regular business on the cardholder's respective island are prohibited. • Gift cards, prepaid cards, stored-value cards, digital-wallet transfers, Visa cash transfers, and similar cash-equivalent transactions • Personal purchases or expenses. • Donations and charitable contributions • Sponsorships, payments to nonprofit organizations, payments to individuals through PayPal or similar platforms, and unapproved recurring subscriptions. • Use of the card to bypass GVIBuy procurement procedures. • Splitting purchases among transactions, cardholders, cards, or agencies to avoid card limits, approval thresholds, or procurement requirements is prohibited. • Charter flights are prohibited.
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Prior Written Approval Required	<u>Prior Written Approval Required</u> The following expenses are prohibited unless formally approved in writing: <u>Meals, Refreshments, Catering, and Alcohol</u> • Refreshments, catering for meetings, employee events, celebrations, or festivities require prior written approval. • Alcohol requires prior written approval from DOF and the Governor. Note: Short notice or procurement delays do not justify credit card use. <u>Air Travel</u> • Out-of-territory travel requires approved documentation or prior written approval when GVIBuy cannot be used. • Premium, upgraded, business-class, or first-class seating requires written justification and approval and may be considered only for flights exceeding four consecutive hours. • Cancellation, change, and rebooking fees require written justification, supporting documentation, and evidence of an emergency or unavoidable circumstance. <u>Lodging</u> • Lodging exceeding \$350 per night within the USVI or \$400 per night outside the USVI. • Multiple rooms, hotel blocks, or extended stays • Any lodging arrangement outside the approved travel authorization • Short-term rentals, including Airbnb and Vrbo <u>Ground Transportation</u> • Luxury, SUV, or specialty vehicles are restricted to the Governor and Lieutenant Governor unless otherwise approved in writing. • Emergency vehicle rentals exceeding three days require prior written approval. • Vehicle rentals outside the established procurement process require prior written DOF approval. <u>Fixed Assets</u> • Fixed-assets purchases require prior written approval, a completed Fixed Asset Form, and proper recording and tagging.
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Prior Approval Cont.	<u>Training, Conferences, and Events</u> • Conference, seminar, training, and early-bird registration fees require prior written approval. • Venue rentals require prior written approval. • Holiday or seasonal decorations, giveaways, and festivities require prior written approval. • Audiovisual services, staging, lighting, gala décor, catering for festive events, printed signage, entertainment, and security services require prior written approval and must comply with procurement requirements. <u>Vendors and Procurement Exceptions</u> • Credit card purchases from non-GVIBuy vendors or vendors with inactive profiles, expired business licenses, inactive registrations, or unresolved compliance deficiencies require prior written DOF approval and justification. Each exception request must include: • A business justification • The estimated cost • Confirmation of available funding • An explanation of why the established procurement process in GVIBuy cannot be used. • Any applicable travel, procurement, or agency approvals Note: Prior approval is required before purchase. Unauthorized, prohibited, personal, duplicate, or unsupported charges must be reimbursed by the next statement and may result in personal financial liability, card suspension, or termination.
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Official Approval Chain	<u>Required Approval Chain / Approval Documents</u> • Initial Review: Travel & Credit Card Compliance Officer • Final Approval: Commissioner of Finance All transactions must include: • Itemized receipts • Description of purchase • Unique ERP document number • Valid funding source and appropriate expenditure object code • Written approval, when applicable. • Fixed Asset Form (if applicable) • Supporting documentation • Notarized lost-receipt affidavit when a duplicate receipt cannot be obtained Note: Transactions without the required supporting documentation shall not be approved for payment and may result in account suspension. <u>Travel Documentation</u> • Approved and signed GTR • Governor-approved travel letter for out-of-territory travel • Flight itinerary • Hotel folio showing room charges and allowable taxes • Conference or training agenda • Registration receipt • Booking confirmation or travel-agent invoice • Receipts and justification for baggage, cancellation, change, or rebooking fees. • Written approval for travel exceptions, including excess lodging, upgraded airfare. • Proof of travel, when required. <u>Statement Payment Documentation</u>
ERP Transaction Requirements	The ERP Straight Pay package must include: • Complete monthly credit card statement • Reconciliation of all charges, credits, returns, and adjustments • Calculated payment amount based on Purchases and Other Charges, less applicable posted vendor credits. • Supporting documents for every transaction • Confirmation of available funding • Appropriate expenditure object codes

Statement Payments and Credits

- Payments marked “PY” are prior account payments and shall not be deducted as vendor refunds.
- Vendor credits marked “CR” are purchase refunds or reversals and must be matched to the original charge.
- Payment must be based on Purchases and Other Charges, less applicable vendor credits, and not solely on Total Activity.
- Charges pending refund must be paid in full. Agencies shall not deduct anticipated credits; refunds will be applied to the next statement after posting.

Record, Monitoring, and DOF Authority

- Credit card records and supporting documentation must be retained for at least five years or longer when required by law, audit requirements, or an official records-retention schedule.
- Statements are generally available by the seventh or eighth day of each month, beginning the 10-business-day payment period.
- DOF may conduct weekly reconciliation reviews and issue a 24-hour cure notice before suspending unreconciled accounts.
- DOF may audit, suspend, restrict, freeze, reduce purchase limits, or terminate accounts for noncompliance, ineligibility, or during fiscal or administrative transitions.
- Before an account is closed, all charges must be reconciled and paid, and the card returned to DOF.
- This SOPP is established pursuant to Act No. 8309 and operates in conjunction with applicable GVI laws, procurement policies, travel requirements, ERP procedures, and Department of Finance directives.

Governance & Revision History

- Policy Owner: Credit Card & Travel Compliance Division
- Review Cycle: Every 24 months
- Changes require Commissioner approval

#	Date	Description	Revised By	Approved By
1	7/17/2020	Review	JM / ES	KC
2	9/28/2020	Review / Revisions / Approval / Release	JM	KC
3	9/25/2023	Review / Revisions / Final / Approval Release	JM	CME
4	2/13/2024	Review / Revisions / Final / Approval Release	JM	KM
5	9/18/2026	Review / Revisions / Final / Approval Release	JM	KM

Commissioner’s Final Approval

I hereby approve this Standard Operating Policy and Procedure for implementation and dissemination.

Commissioner’s Signature: Kevin McCurdy

Printed Name: Kevin McCurdy

Date: 9/21/2026