

**STUDENT ALTERNATIVES PROGRAM, INC. DBA TRIUMPH PUBLIC HIGH
SCHOOLS (TPHS)
BOARD POLICY MANUAL
POLICY GROUP 5 – FISCAL MANAGEMENT
CORPORATE CREDIT ACCOUNTS**

PG-5.220

Sec. 1. PURPOSE OF POLICY.

Through this policy, the Board of Directors (hereafter, the “Board”) of Student Alternatives Program, Inc. doing business as Triumph Public High Schools (TPHS) (hereafter, the “Charter District”) shall address the legal requirements, as applicable, pertaining to the use of the Charter District’s corporate credit accounts.

Sec. 2. APPLICABILITY.

Unless otherwise indicated, this Policy PG-5.220 applies to the Charter District’s administration of the line of credit established through corporate charge or credit accounts.

Sec. 3. AUTHORITY OVER FISCAL MATTERS.

Sec. 3.1. Controlling Policy. Unless otherwise indicated, Board Policy PG-5.001, Authority Over Fiscal Matters, will govern and control over the policy statements set forth in this Policy PG-5.220.

Sec. 3.2. Delegate. For the Board policy pertaining to the Delegate and designee, see Section 3.2 and Section 4 of PG-5.001.

Sec. 3.3. Prudent Person Rule. See Policy PG-5.001, Section 7.

Sec. 3.4. Abuse and Waste Prohibited. See Policy PG-5.001, Section 8.

Sec. 4. BOARD AUTHORIZATION.

Sec. 4.1. Subject to Section 3 of this policy, the Board authorizes the Delegate to establish a corporate credit account(s) for the purpose of procuring goods and/or services for Charter District activities, functions, programs and services and to facilitate business travel. In furtherance of this purpose, the Delegate may authorize certain Charter District employees to use the corporate credit account(s).

Sec. 4.2. In authorizing the establishment of a corporate credit account(s), the Board is not authorizing the Delegate to pay the corporate credit account issuer(s) directly. Instead, the Delegate must require each employee authorized to use the corporate credit account(s) to assume personal liability for all charges, to request reimbursement of charges conforming to this policy, and to pay the issuer directly for the expenses charged to the corporate credit account(s) assigned to the employee.

Sec. 5. COMPLIANCE WITH POLICY.

In establishing a corporate credit account(s), the Delegate must ensure compliance with the requirements set forth in this policy and other Board policy. In accepting the Delegate's authorization to use the corporate credit account(s), Charter District employees must adhere to the requirements set forth in this policy and other Board policy.

Sec. 6. EMPLOYEE ELIGIBILITY.

Sec. 6.1. Employment Status. Charter District personnel must be employed on a full-time status to be eligible to use the corporate credit account(s). Charter District personnel employed on a less than full-time status, independent contractors, and volunteers are not eligible to use the corporate credit account(s).

Sec. 6.2. Eligible Employees. Charter District personnel listed in Section 5 of PG-5.001 are eligible to use the corporate credit account(s). Additionally, the Delegate may authorize a Charter District employee not listed in said policy to use the corporate credit account(s) if, on a monthly basis, the employee purchases goods and/or services or travels in furtherance of the Charter District's business activities and incurs \$500 or more related expenses monthly.

Sec. 6.3. Credit Worthiness. The Delegate may not approve any Charter District employee that is not credit worthy as determined by the credit account issuer after conducting an authorized credit history check.

Sec. 6.4. Participation Optional. Charter District employees are not required to use the Charter District's corporate card account(s) to purchase goods and/or services or to conduct business travel. Instead, employees may submit an expense reimbursement request.

Sec. 7. REQUIREMENTS FOR APPROVAL AND USE.

Sec. 7.1. Application Required. To be granted authorization to use the Charter District's corporate credit account(s), a Charter District employee must submit a written application in the form specified by the Delegate.

Sec. 7.2. Credit Review Required. Charter District employees that submit a corporate credit account application must authorize the corporate credit account issuer to conduct a review of the employee's credit history.

Sec. 7.3. Agreement Required. Prior to using the Charter District's corporate credit account(s), the employee must sign a standard written agreement in the form specified by the Delegate. In the standard written agreement, the Delegate must include terms and conditions that effectively implement this policy and best practices that safeguard the use of the corporate credit account(s).

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Sec. 7.4. Form. An employee authorized to use the Charter District’s corporate credit account(s) must do so through a corporate credit account card(s).

Sec. 7.5. Financial Responsibility. Prior to using the Charter District’s corporate credit account(s), the employee must accept financial responsibility for any expenses charged to their assigned corporate credit account and card that fails to conform to the requirements of this policy and applicable law.

Sec. 8. DELEGATES RESPONSIBILITIES.

The Delegate or designee must:

- (a) Oversee the administration of the Charter District’s corporate credit account(s).
- (b) Process all requests to use the corporate credit account(s), including any modifications to said use.
- (c) Restrict the use of corporate credit account(s) to specific Merchant Category Codes to mitigate the use of the account(s) at unapproved merchant types.
- (d) Review each cardholder’s expenses, approve or disapprove each cardholder’s charges, and authorize the payment of all eligible expenses charged to the corporate credit account(s).
- (e) If an expense is disapproved, inform the cardholder in writing of the amount(s) that were disallowed and the basis for the disallowance.
- (f) Provide monthly statements to each employee authorized to use the corporate credit account(s).
- (g) Require each employee to affirm, in writing, that the expenses disclosed on each monthly statement were incurred for official Charter District business and conform to applicable legal requirements and Board policy.
- (h) Monitor and enforce compliance with this policy, any other related Board policies, and any administrative procedures.
- (i) Investigate any irregularities or alleged misconduct and report findings to the Board.
- (j) Take control and possession of an employee’s access to the corporate credit account(s) upon the employee’s separation from employment with the Charter District or other relevant change in employment status.

(k) Disclose, in writing, any violation of this policy by any employee to the Board.

Sec. 9. AUTHORIZED EMPLOYEE DUTIES.

Sec. 9.1. Abuse and Waste Prohibited. Consistent with Section 8 of Policy PG-5.001, cardholders must not use the corporate credit account(s) to abuse or waste the Charter District's financial resources and established lines of credits.

Sec. 9.2. Appropriate Use. Cardholders must agree to the appropriate use of the corporate credit account(s) and card(s) assigned to them thereby restricting the use of said account(s) and card(s) to the purchase of goods and/or services for official Charter District business.

Sec. 9.3. Billing Errors and Unrecognized Transactions. Cardholders must identify and satisfactorily resolve any billing errors and unrecognized expenses.

Sec. 9.4. Credits and Returns. Cardholders must return items for credit and not for cash refunds. Cardholders must ensure that any returned items are credited to the corporate credit account(s).

Sec. 9.5. Disclosure of Conflicted, Interested, or Related-Party Transactions. Cardholders must disclose to the Delegate or designee any business arrangement or transaction with any conflicted, interested, or related party, as defined in other Board policy or applicable law. Cardholders may not enter into a business arrangement or conduct a transaction in such a manner so as to circumvent this requirement.

Sec. 9.6. Fraudulent Charges. Cardholders must report fraudulent charges to the corporate credit account issuer and the Delegate or designee immediately after they become aware of the fraudulent charges.

Sec. 9.7. Fraudulent Use Prohibited. Cardholders must not use their corporate credit account(s) and card(s) to commit fraud or other criminal act. Cardholders may be liable for any fraudulent or other charges of a criminal nature.

Sec. 9.8. Liability for Charges. Cardholders must agree to be liable for the expenses charged to the corporate credit account(s) and card(s) assigned to them and to pay the credit account and card issuer for the expenses incurred. Notwithstanding, personal use of the corporate credit account(s) and card(s) is strictly prohibited and any abuse may lead to loss of card privileged, as well as adverse employment action up to and including termination.

Sec. 9.9. Lost or Stolen Card(s). Cardholders must report lost or stolen corporate credit cards to the issuer and the Delegate or designee immediately after they become aware of the loss.

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Sec. 9.10. Method of Procurement. Cardholders are required to and are responsible for procuring goods and services pursuant to the procurement methods identified in the Board’s Policy relating to Purchasing and Contracting.

Sec. 9.11. Personal Use Prohibited. Cardholders must only use their corporate credit account(s) and card(s) for official Charter District business only and must not use the account(s) and card(s) for their personal benefit. Cardholders must agree to be liable for any charges of a personal nature and may face personnel action, up to and including termination.

Sec. 9.12. Prudent Person Rule. An authorized employee, or cardholder, must limit the use of the corporate credit account(s) to costs that adhere to the Prudent Person Rule set forth in Section 7 of Policy PG-5.001.

Sec. 9.13. Reconciliation Required. Cardholders must reconcile any and all charges disclosed on the monthly statement pertaining to their assigned corporate credit account(s) to original, itemized receipts. Cardholders must subsequently submit the receipts to the Delegate or designee and identify any expenses for which a receipt is missing, or which was not authorized by the cardholder.

Sec. 9.14. Reimbursement Request. Cardholders must agree to submit requests for reimbursement for legitimate business expenses.

Sec. 9.15. Safeguarding Account. Cardholders must appropriately safeguard their assigned corporate credit account(s) and card(s), including the account number, the security code, expiration date and associated mailing zip code to protect against any unauthorized access of the corporate credit account.

Sec. 9.16. Sales Taxes. Since the Charter District is tax-exempt, cardholders must ensure that sales taxes are not charged on any purchase.

Sec. 10. AUTHORIZED USER.

Only the cardholder must use their assigned corporate account(s) and card(s) to purchase goods and/or services, including business travel. A cardholder may not authorize anyone, including a Charter District employee, to use their assigned corporate account(s) and card(s) for any purpose.

Sec. 11. PROHIBITED USE.

Sec. 11.1. Cardholders must not exceed the credit limit on their assigned corporate credit account(s) and card(s).

Sec. 11.2. Although not all inclusive, cardholders must not use their assigned corporate credit account(s) and card(s) for the following types of activities and expenses.

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- (a) Alcoholic beverages.
- (b) Cash advances.
- (c) Donations.
- (d) Food and beverages not associated with travel for official Charter District business.
- (e) Gift cards.
- (f) Gratuities or tips.
- (g) Information technology hardware or software.
- (h) Loans.
- (i) Medical services, prescription and nonprescription drugs, or supplements.
- (j) Non-business related charges, including any expense resulting in a personal benefit.
- (k) Political contributions or lobbying activities.
- (l) Purchases subject to Section 3.3 of Policy PG-5.001.

Sec. 11.3. Cardholders may not use their assigned corporate credit account(s) and card(s) for component, separate, or sequential purchases to avoid or bypass the Charter District’s purchasing and payment policies and procedures. See Policy PG-5.510, Sections 4.1, 4.8 4.9, and 5.13.

Sec. 12. TERMINATION OF CARDHOLDER PARTICIPATION.

A cardholder’s corporate credit account(s) and card(s) may be cancelled for the following reasons:

- (a) The cardholder is no longer employed by Charter District.
- (b) The cardholder changes position and their new position does not meet the requirement for eligibility set forth in Sec. 6 of this policy.
- (c) In using their assigned corporate card(s), the cardholder materially violated this policy or other related Board policy and any pertinent administrative procedures.
- (d) The cardholder is suspended, placed on administrative leave, or is subject to other adverse employment action.

Sec. 13. REQUIRED SUBSTANTIATION.

Sec. 13.1. For each transaction, cardholders must provide:

- (a) a sufficiently detailed description of:
 - (1) the business purpose for the transaction;
 - (2) how said purpose directly benefited the Charter District; and

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- (3) the names of the individuals who were part of the transaction, including the organization they represented and the official capacity in which they represented said organization; and
- (b) the original, itemized third-party receipts and other such records that fully discloses:
 - (1) the vendor's name, place of business and contact information;
 - (2) the transaction date and total amount of the purchase; and
 - (3) individual line items for the goods and/or services purchased and the cost of each item.

Sec. 13.2. Cardholders must ensure that vendors provide an original, itemized receipt conforming to the requirements set forth in Section 13.1(b) of this policy.

Sec. 13.3. If the cardholder fails to provide the required substantiation under Section 13.1 of this policy, the cardholder is liable for the amount(s) of the unsubstantiated transaction(s).

Sec. 14. REVIEW BY BOARD.

Without exception, the Board must review and approve or disapprove the expenses charged by an officer, as defined in Section 5 of PG-5.001, to their assigned corporate credit account(s) and required substantiation. If disapproved, the Board's designee must inform the officer in writing of the amount(s) that were disallowed and the basis for the disallowance.

Sec. 15. PARTICIPATION IN REWARDS PROGRAM.

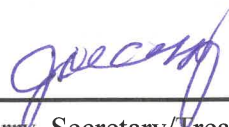
The Charter District may participate in any rewards program offered by the corporate credit account issuer(s). If the Charter District participates in a rewards program, the Charter District must retain ownership of any rewards earned under said program and must use any rewards received for the benefit of the Charter District's students.

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CERTIFICATION

The Undersigned, being the Secretary of the Board, hereby certifies that the foregoing represents a true copy of the Board Policy PG-5.220, Corporate Credit Accounts, as adopted by the Board on May 16, 2026, which Policy is in full force and effect and has not been amended or repealed.



Joe Curry, Secretary/Treasurer



Date Certified