BILL360

WHITE PAPER

Support is not Readiness

Why Visa's Commercial Enhanced Data Program is an AR workflow problem, and what B2B finance leaders should do about it.

For business owners, CFOs, controllers, and accounts receivable leaders at B2B companies that accept commercial card payments.

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EXECUTIVE SUMMARY

The most important CEDP decision happens before the processor sees the transaction.

In April 2025, Visa® launched the Commercial Enhanced Data Program, known as CEDP. It is the most consequential change to U.S. commercial card interchange in years, sometimes driving a transaction rate increase near 1 percent or more of the invoice for invoice payments made by a Visa commercial card. Full enforcement began on October 17, 2025. By April 18, 2026, the existing Level 2 incentive program is retired, and CEDP becomes the only path to preferential commercial card rates for B2B merchants in the United States.

Most merchants are hearing about CEDP through their payment processor. That is the wrong on-ramp.

At its core, CEDP is not a processor configuration. It is a data and workflow program that happens to be enforced at the payment-processing layer. The merchants who will qualify for the lowest interchange rates, and avoid the highest ones, are the ones whose accounts receivable workflow produces complete, accurate, invoice-level data before a transaction is presented to Visa. The payment processor receives that data and passes it to the network. The processor cannot create data the merchant did not capture upstream anymore.

This is the distinction every finance leader needs to internalize:

> Processor support is a transmission capability. CEDP readiness is a workflow.

When a processor says it supports CEDP, what is usually meant is that the rails can accept and forward the enhanced data fields Visa requires. That is necessary, but it is not sufficient. Sufficiency requires capturing those fields at invoice creation, validating them, correcting any gaps before payment, and submitting clean data inside Visa's verification windows. It also means knowing, day to day, which transactions qualified and which downgraded.

Verification status by Visa requires 90 percent or more of business card payments under the CEDP program to pass their AI-driven CEDP test. Merchants failing to meet the verified status face delayed credits for transactions that may later qualify which creates a reconciliation issue and potentially audit questions.

For B2B finance leaders, that turns CEDP into a question about AR systems and ownership, not about which gateway is plugged in. The merchants most exposed are the ones who assume the processor or the gateway is handling it. The merchants who will benefit most are the ones who treat the invoice, not the payment, as the place where CEDP success is decided.

This white paper makes that case in detail, walks through what Visa requires, exposes the gap between supporting CEDP and operating CEDP, and offers a ten-question diagnostic any finance leader can run this quarter. Bill360 sits inside the AR workflow, which is why we believe this conversation belongs to finance—not to IT, not to the gateway, and not to a vendor checklist.

WHY THIS MATTERS NOW

A quiet rule change with loud implications.

There is more money moving on commercial cards in B2B than the trade press would suggest, and the interchange differential between a CEDP-qualified transaction and a downgraded one is meaningful enough to register on a finance dashboard. Merchants with downgraded Visa transactions can expect to pay between 40 basis points to 1.5 percent more of their invoice amount. Transaction cost increases of 20 to 35 percent will be common, with some reaching as high as 80 percent, over the rates prior to CEDP. Based on the B2B card volumes finance teams routinely see, the dollar impact compounds quickly.

What is unusual about this change is not only its size. It is how quietly it landed.

Most major Visa or Mastercard® rule changes get treated as headline events. CEDP did not. The Strawhecker Group®, an analyst firm focused on payments, has noted publicly that despite the scale and impact of the change, broader payment industry dialogue has been limited, and that a number of card payment companies are still claiming they have workarounds rather

than fully built-out CEDP solutions. If your processor's CEDP communications consist of a help-center article and a slide deck, you should assume the operational work is yours to do, not theirs.

There was also a deadline that was easy to miss. On April 18, 2026, the existing Level 2 lower-cost incentive structure was retired entirely. Merchants who relied on partial enhanced-data submissions for any reduction below standard interchange lost that fallback. After April 2026, the choice is binary. Meet CEDP standards and qualify for Product 3 rates, or accept standard commercial card interchange, which are materially higher.

APRIL 18, 2026

The day Level 2 incentives were retired. After this date, CEDP is the only path to preferential Visa® commercial card interchange for B2B merchants in the U.S.

For a CFO or controller running a B2B business that accepts commercial cards, the practical implication is that the cost of doing nothing changed quietly in 2025 and changed again, more sharply, in 2026. Doing nothing was acceptable when the floor was Level 2. The floor is moving up.



WHAT CEDP ACTUALLY IS

A data standard with a verification regime on top.

CEDP is best understood as two things working together: an enhanced-data submission standard and a verification regime that decides whether a merchant is rewarded for meeting it.

The data standard

For Visa commercial card transactions to qualify for the new lower interchange tier, which Visa calls Product 3, the merchant must submit invoice-level information alongside the payment. The fields Visa expects include the invoice number, customer code, purchase order number, merchant and customer tax detail, the destination postal code, freight and duty amounts, discount amounts, and line-item detail such as description, quantity, unit of measure, unit cost, extended amount, and commodity or product code. Some of these fields will be familiar to anyone who has touched Level 2 or Level 3 commercial card processing. What changed is the mix, and the strictness.

Visa has also signaled that auto-populated, generic, or placeholder values do not qualify. The data has to reflect what is actually on the invoice. That rules out shortcuts some merchants and payment processors used historically to clear an enhanced-rate qualification floor without genuinely structured invoice data.

Data verification

CEDP is enforced through ongoing AI analysis and machine-learning-driven validation of submitted data, with merchants assigned a verification status based on rolling performance. Visa has indicated that achieving and maintaining verified status generally requires roughly 90 percent of qualifying transactions to pass data-quality checks over

90% of qualifying transactions must pass data-quality checks to attain verified status

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a rolling 30-day window. Merchants below that threshold are deemed non-verified. Their qualifying transactions still receive incentives, but only after a delay and validation pass, rather than at settlement.

In addition, merchants should know that verified status is dynamic. A merchant can lose it and regain it as data quality changes.

Two implications follow from the structure of the program.

First, CEDP is no longer a transactional question. A merchant cannot succeed at CEDP by handling each transaction well. Visa is evaluating data quality as a system over time. The operational question is whether every qualifying transaction routinely meets the standard, not whether the merchant can produce a clean record when it is convenient.

Second, CEDP outcomes are now visible to Visa and the payment processor before they are visible to the merchant. This is critical because the merchant who finds out their verification status slipped because settlement timing changed is finding out too late.



THE HIDDEN DISTINCTION

Supporting CEDP and operating CEDP are two very different things.

Walk through the major U.S. payment processors and gateways: Fiserv®, Global Payments®, Elavon®, Chase Payment Solutions, Stripe®, Adyen®, Cybersource®, Authorize.net®, PayPal®/Braintree®, and others. Almost all of them will tell you they support CEDP or enhanced data. They are telling the truth. Their rails can carry the fields Visa wants.

The question a B2B finance leader needs to ask is what kind of support that is.

Stripe's own help documentation is unusually candid on this point. Stripe explains that its API supports passing line-item data for Product 3 participation, but the merchant has to actually pass the data. Stripe does not auto-populate invoice fields the merchant has not provided. That is not a knock on Stripe. It is the architecture of any payment processor or gateway. By design, the processor is a downstream actor in the payment workflow. It receives a transaction. It does not invoice the buyer. This produces a distinction that matters in practice but rarely surfaces in vendor conversations.

FIGURE 1 Difference between what it means when a processor "supports CEDP" versus what is actually required.

What "processor supports CEDP" usually means	What CEDP operational readiness actually requires
The rails accept the required enhanced-data fields.	Invoice data is captured at creation, with every required field present.
Data, once supplied, is forwarded to the network.	Data is validated before submission, with gaps flagged and corrected.
Documentation and APIs are available to developers.	At scale, CEDP readiness generally requires a AI analysis engine and a customer success team.
Settlement and reporting reflect what was submitted.	Submission is automated end to end, not dependent on per-transaction rekeying.
The processor reports on transmitted data quality.	The merchant owns CEDP outcomes as a measurable finance KPI.

In Figure 1, neither column is wrong. Both are needed. However, they describe different layers of the stack, and the left column does not produce the right column on its own. A merchant whose only CEDP plan is “our processor supports it” has solved the transmission problem and left the data-quality problem on the table.

This critical disconnect is precisely the gap this white paper aims to illuminate. When a payment processor claims they "support CEDP", the statement is factually accurate. The work behind it (data that is clean, captured early, validated, reconciled, and owned by a named person inside finance) remains unaddressed. This is where merchants who mistake processor compatibility for a complete solution will silently slip into non-verified status, unknowingly absorbing one of the most substantial and punitive price increases in the history of commercial card processing.

KEY TAKEAWAY:

Payment processors are generally not in the invoice workflow. Purpose-built B2B AR automation software such as Bill360 was created for the day Visa® built the capability to verify invoice data. And that day has arrived.



WHY TIMING IS THE SILENT VARIABLE

By the time the card is presented, the invoice has mostly decided the outcome.

The most important CEDP decision a B2B merchant will make is not which processor to use. It is how the invoice is built and examined for validation.

Once a transaction is presented for settlement, the data that determines whether it qualifies for Product 3 is largely fixed. Yes, Visa allows a 96-hour window for enhanced data submission. Yes, a processor with the right capabilities can append line-item data after settlement in some flows. But the underlying invoice fields either exist in a complete, accurate, structured form somewhere upstream, or they do not. If the invoice in the AR system has no PO number, no destination ZIP, and a free-text “services rendered” line, no amount of downstream effort by the processor will create that data.

Visa has made the upstream point explicit by rejecting placeholder and auto-populated fields. Submitted data must reflect the real invoice. That cuts off the historical workaround of populating Level 2 and Level 3 fields generically just to clear a qualification floor.

> The most important CEDP decision happens before the processor ever sees the transaction.

There is a parallel here to a more familiar finance discipline. Reconciliation is hard if the books are messy. CEDP qualification is hard if the invoice is messy. In both cases, the cleanup work belongs at the source, not at the end.

WHY THIS IS DIFFICULT IN PRACTICE

The rule is straightforward. The operational gap is not.

In most B2B finance organizations, invoice data lives in several places. The system of record is usually an ERP or accounting platform such as QuickBooks®, Xero®, NetSuite®, Sage®, Microsoft Business Central®, Acumatica®, or a vertical-specific package. A billing or AR module may sit alongside it. Customer master data, tax data, and shipping data may live in a CRM, a tax engine, an order-management system, or an ERP customer record. The actual invoice sent to a customer may flow through email, a portal, a PDF, or a printed piece of paper.

CEDP requires that all of the relevant data, including buyer code, PO, tax, ship-to, line items, freight, and discount, be present, accurate, and structured when the card is presented for settlement through the Visa platform. Achieving this level of data transmission requires seamless, real-time integration between the systems that hold those fields, manual rekeying, or both. However, most B2B SMB and mid-market payment infrastructure simply does not possess this level of system integration today.

Five operational failure modes

There are five distinct operational failure modes that commonly prevent B2B merchants from successfully capturing CEDP interchange savings:

1. Invoice data is incomplete at the time of payment. The invoice has the dollar amount but not the line-item fields, ship-to, or PO. The card is processed anyway, and the transaction downgrades.

2. Required fields exist in different systems and never meet. The ERP knows the PO. The shipping system knows the destination ZIP. The invoice that gets paid does not pull both.

3. AR teams rekey fields to qualify for rates. This creates accuracy problems due to human error that CEDP's validation will catch over time, even if it produces a momentarily qualifying transaction.

4. No validation layer exists between AR and submission. Nothing flags a missing PO or a malformed customer code before the transaction goes through.

5. No one owns the outcome. The accounts receivable department thinks the processor handles it. The processor thinks the merchant supplies the data. IT thinks the gateway is configured correctly. Finance does not see the downgrades until the monthly statement, by which point the verification trend has already turned.

None of these failure modes are processor failures. They are merchant-side workflow failures. A processor that supports CEDP cannot fix them because the processor does not control where invoice data is created, stored, or assembled.

This is also why CEDP is showing up disproportionately in commentary from AR-adjacent vendors rather than from processors. The companies that touch the workflow earliest have the clearest view of the problem.

THE READINESS DIAGNOSTIC

Ten questions any CFO can answer in an afternoon.

The single most useful thing a B2B finance leader can do this quarter is take a hard look at their own workflow against the standard. The following ten questions are designed to be answerable in an afternoon by a CFO or controller who can pull a few reports and have a short conversation with AR, IT, and the payment processor.

The questions are purposely written to be vendor-neutral. They are the questions a CFO should be able to answer in a few hours.



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Top 10 CFO Questions

1. Do we know which of our customers pay us with commercial cards, as opposed to consumer or debit cards?
2. What percentage of our card-paid revenue is on commercial cards? (This is the revenue CEDP affects.)
3. Are invoice number, customer code, PO number, ship-to postal code, tax detail, freight, discount, and line-item data present on every invoice that will be paid by a commercial card?
4. Are those fields captured and structured at the point of invoice creation, or are they rekeyed after the fact?
5. Do we have an AI-enhanced validation solution that flags missing or malformed fields before the transaction is submitted?
6. Who, by name and role, owns CEDP readiness inside our organization? Is it finance, AR, IT, or the processor?
7. Can we see, transaction-by-transaction, which payments qualified for Product 3 and which downgraded?
8. Can we measure the dollar impact of non-qualifying transactions over a rolling 30-day window?
9. Have we asked our processor specifically what it validates, as opposed to what it accepts and transmits?
10. If our verified status dropped tomorrow, would anyone in finance know within 30 days?

A CFO who can answer "yes" to questions 3, 4, 5, 7, and 8, and name a specific person for question 6, is operationally CEDP-ready. The rest is execution.

A business that cannot answer "yes" to most of those questions may have a processor problem. Individual software systems that solve for Visa invoice validation and control the payment flow are architected and built from the ground up to solve this problem.

HOW BILL360 THINKS ABOUT THIS

From the invoice outward.

It has been maintained throughout this white paper that CEDP success is determined primarily upstream of the processor, in the workflow that produces the invoice. Bill360 leverages its position in the workflow and its AI-native technology to provide CEDP validation for B2B clients.

Bill360 is a B2B accounts receivable (AR) automation and embedded payments software platform. Bill360 was designed for B2B from day one. It was not adapted from a consumer payments product. It connects to accounting, ERP, and vertical specific software systems common in the B2B space, accepts ACH and card payments through a digital wallet, and operates as a licensed Payment Facilitator (PayFac) so customers can take large business transactions without funds being held. On average, customers report being paid 36 percent (or 10 days) faster after moving to Bill360. In addition, even smaller clients are saving up to 15 hours a week by automating once manual, time-consuming tasks. For a company with an average accounts receivable balance of $250,000, implementing Bill360 technology can mean accelerated cash flow of $80,000 or more in the bank 60 to 90 days after full implementation. The savings from lower payment processing costs and back office wage costs add to profitability—and in many cases, significantly.

> The best solution to CEDP requires a B2B AR automation platform, a B2B customer success team, and AI-native technology developed specifically to help identify and, in some cases, help correct validation deficiencies.

That product architecture matters for CEDP in three specific ways.

Position in the workflow

Bill360 works where the invoice is generated, where the customer reviews it, and where payment is taken. That placement is not a marketing claim. It is the structural design of the platform. The same system that creates the invoice can carry the fields CEDP requires into the moment of payment.

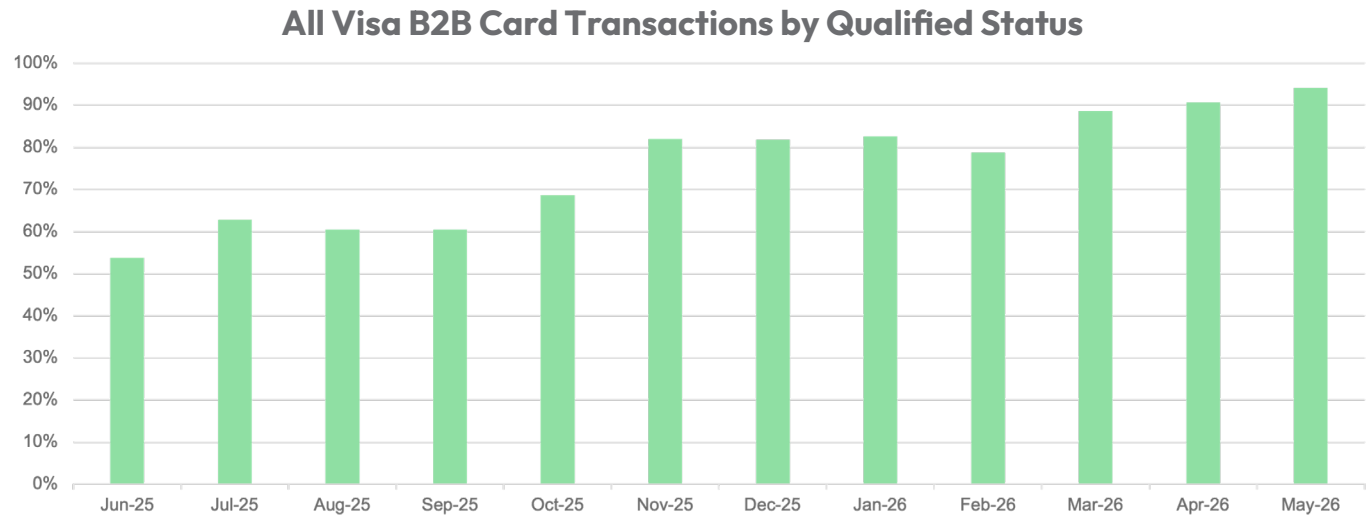
B2B-built, not retrofitted

Most payment systems, including QuickBooks Payments and Stripe, were primarily designed for consumer card transactions and have B2B features bolted on. The customer and invoice data, workflows, and rule structures that B2B finance actually needs, including invoice numbers, PO references, customer codes, ship-to detail, and line-item structure, are native to Bill360 because they were part of the original data-driven design rather than a later addition.

Invoice, payment, and reconciliation as one system

When the same platform produces the invoice, processes the credit card, and reconciles the transaction back into the accounting ledger, the seams where invoice data normally gets lost between billing, gateway, and ERP collapse.

FIGURE 2 Bill360 customer cohort: monthly mix of B2B commercial card volume by Visa qualified status. Several categories of Visa commercial cards are excluded from the Visa CEDP program.



Source: Bill360 internal data, June 2025 through May 2026.

It is not being suggested that Bill360 is the only way to solve the CEDP issue. There are other AR vendors and payment platforms that sit at different points in the workflow, and finance leaders should evaluate each of them thoroughly. Instead, this white paper is emphasizing that the kind of solution CEDP requires lives upstream of the processor, and that finance leaders evaluating their options should weigh placement in the workflow above breadth of feature checklist.

This leads to the recommendations that follow.

RECOMMENDATIONS

Three moves a CFO can make this quarter.

Here are three steps a finance leader can take, regardless of whether they are evaluating Bill360 or another platform.

In the next 30 days, audit your invoice data

Pull a sample of recent invoices that were paid by commercial card. For each invoice, check whether every CEDP field, including invoice number, customer code, PO number, ship-to postal code, tax detail, freight, discount, and structured line items, was present and accurate at the point of invoice creation. If the data was manually rekeyed afterward to qualify for an enhanced rate, that is the failure mode CEDP is built to catch.

In the next 60 days, map your transaction workflow

Trace the path from invoice creation to payment presentment. Identify every system that touches a CEDP-relevant field. Identify which fields move automatically and which require human action. Identify where validation occurs, if anywhere. Most finance teams will be surprised by the number of seams in their own process.

In the next 90 days, assign ownership

CEDP outcomes need a name. Whoever owns the AR function should own qualification rate as a finance metric, the same way they would own DSO, bad debt, or unapplied cash. If a CFO cannot point to one person who would know if verified status dropped, the work above is not yet done.

None of the three steps require a vendor selection. They are diagnostic, not transactional. They tell you, faster than any payment processor conversation, whether your company is operationally ready for the program Visa is now enforcing.

If those steps surface that the gap lives in the AR workflow rather than at the processor, which is the pattern described throughout this white paper, Bill360 is positioned to talk about how an upstream solution would look. The conversation we recommend is a CEDP readiness review of your invoice and payment workflow.

ABOUT BILL360

Built for B2B, from the invoice outward.

Get paid an average of 10 days faster, simplify back-office operations, and eliminate tedious tasks with the only AR automation, digital invoicing, and embedded payments software platform purpose-built for B2B companies of all sizes. Bill360's proprietary, AI-native technology can lower Visa B2B invoice transaction fees by up to 35% or more. It syncs with accounting and ERP systems common in the B2B space, accepts ACH and card payments through a digital wallet, and operates as a licensed payment facilitator.

Unlike AR automation software that's been built for consumer (B2C) payments and adapted for B2B, Bill360 was built specifically to help B2B companies enhance their invoicing and payment processes around recurring customer relationships.

- **All-in-One B2B Solution:** The Bill360 platform combines AR automation and payment control into one secure, easy-to-use platform that enables you to manage everything in one place.
- **Goes Beyond Basic Accounting:** Bill360 offers advanced B2B features and reporting that save time, accelerate cash flow, and most importantly improve profitability.
- **Smart Payment Engine:** Bill360's payment system connects with various data sources and simplifies the payment process, accelerates collections, and gives you more control over invoicing and the buyer easier ways to pay.

A note on methodology

The factual claims in this paper about Visa's Commercial Enhanced Data Program, including the existence and timing of the program, the introduction of the Product 3 interchange tier, the verification regime, the rolling 30-day data quality threshold, the 96-hour data submission window, the April 18, 2026 retirement of the Level 2 incentive structure, and the rejection of placeholder or auto-populated data, are drawn from Visa's own published commercial card documentation and from public materials issued by major U.S. payment processors, gateways, acquirers, and independent payment analysts.

The analytical frame of the paper, including the distinction between processor support and operational readiness, the workflow premise, and the readiness diagnostic, is original Bill360 analysis. It is not statistical work and is not presented as such. It is offered as a way of thinking about CEDP that we believe is more useful to a B2B finance leader than the program-explanation content currently available in the market.

Where this white paper offers numbers, including interchange differentials, qualification thresholds, and timing windows, the figures are reported from publicly available sources at the time of writing and are subject to change as Visa refines the program. Merchants should confirm specific CEDP applicability, fee structure, and verification mechanics with their card payments company, processor, and Visa program documentation. Based upon competitor marketplace dynamics, many card payment industry experts expect Mastercard to follow with a program similar to CEDP.

Nothing in this paper is intended as legal, compliance, or financial advice.

To learn more about AR automation, download Bill360's exclusive eGuide.

Get it now



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