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# COMMERCE ACQUISITION MANUAL 1313.301

DEPARTMENT OF COMMERCE Purchase Card Program

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# **Purchase Card Program**

## **SECTION 1 – OVERVIEW**

#### 1.1 Background

Executive Order 12931, "Federal Procurement Reforms" dated October 13, 1994, sets forth requirements for Federal agencies to establish programs for reducing administrative costs and other burdens that the acquisition function may impose on the Federal Government and private sector. In accordance with Federal Acquisition Regulation (FAR) 13.201(b), the Government-wide commercial purchase card shall be the preferred method to purchase and pay for micro-purchases.

#### 1.2 Purpose

The purpose of the Department of Commerce (DOC, Department) Purchase Card Program is to implement the General Services Administration SmartPay® Program for Government-wide commercial purchase cards within the Department of Commerce. The Purchase Card Program provides policy and guidance regarding the use of the purchase card and convenience checks issued under the purchase card program.

Operating Units are authorized to develop supplemental operational policies and guidance related to the purchase card, which may be more, but not less restrictive than the Departmental policy. Supplemental policies must be reviewed by the Office of Acquisition Management prior to implementation.

#### 1.3 Applicability

The Purchase Card Program applies to Department of Commerce employees participating in the Government-wide purchase card program, including Agency Program Coordinators, Approving Officials, Cardholders and other associated personnel. Participation in the purchase card program shall be limited to DOC employees whose current appointments have durations exceeding one year.

#### 1.4 Program Objectives

The primary objectives of the Purchase Card Program are to improve mission support, streamline the placement of micro-purchases, reduce administrative costs and paperwork, streamline payment procedures, improve cash management practices, and improve management controls, reporting and decision-making activities while ensuring the adherence to Federal and Departmental acquisition regulations, policies and guidance, and GSA SmartPay® master contract provisions.

#### 1.5 Roles and Responsibilities

#### **1.5.1 Senior Procurement Executive (SPE)**

The Senior Procurement Executive is responsible for, but not limited to:

- a. Implementing and overseeing the management of the Purchase Card Program department-wide; and
- b. Approving deviations from purchase card program policies.

#### 1.5.2 Senior Bureau Procurement Official (BPO)

The Senior Bureau Procurement Official is primarily responsible for, but not limited to:

a. Implementing the Purchase Card Program within their Operating Unit;

- b. Nominating agency program coordinators;
- c. Developing supplemental guidance; and
- d. Requesting deviations from purchase card program policies.

#### 1.5.3 Purchase Card Program Manager

The purchase card program manager is primarily responsible for, but not limited to:

- a. Serving as the contracting officer representative for the Department's SmartPay® task order;
- b. Serving as Level I Agency Program Coordinator (APC) for all Department charge card business lines (purchase, travel, and fleet cards);
- c. Developing and updating DOC policies, procedures, and guidance for the purchase card program;
- d. Serving as the primary point of contact for clarification of policy and contractual issues regarding the charge card program;
- e. Serving as Chairperson on the purchase card program's risk management team;
- f. Liaising on behalf of the Department with the servicing bank;
- g. Preparing reports to the Office of Management Budget and General Services Administration;
- h. Maintaining delegations of authority for agency program managers;
- i. Creating customized course curricula; and
- j. Conducting internal control reviews for the purchase card program.

## 1.5.4 Head of Contracting Office (HCO)

The Heads of Contracting Office are primarily responsible for, but not limited to:

- a. Managing the purchase card program within their respective contracting office;
- Delegating authority to an agency program coordinator to manage the day-to-day operation of the purchase card program;
- c. Delegating approving official and cardholder authorities with purchasing limits;
- d. Authorizing the use of convenience checks;
- e. Reviewing and approving agency program coordinators' reports to ensure compliance with internal controls;
- f. Terminating delegations and appointments;
- g. Providing written certification to the SPE that cardholders, approving officials, and agency program coordinators have met annual refresher training requirements;
- h. Identifying strategic sourcing opportunities; and
- i. Reporting suspected fraud, waste, abuse, and/or misuse.

#### 1.5.5 Agency Program Coordinator (APC)

Agency Program Coordinators are primarily responsible for, but not limited to:

- a. Managing the Purchase Card Program for their respective Operating Unit;
- b. Performing oversight functions;
- c. Conducting monthly reviews on convenience checks (100% of transactions) to ensure compliance with internal controls;
- d. Providing guidance to approving officials and cardholders;
- e. Managing purchase card and convenience check accounts;
- f. Reviewing cardholder and approving official transactions;
- g. Maintaining bureau data within the servicing bank's tool (i.e., hierarchies);
- h. Maintaining records on completed training; Assisting the HCO with development of Operating Unit-specific purchase card training;
- i. Recommending terminations of purchase card delegations;

- j. Terminating and suspending accounts for suspected fraud or abuse upon the direction of the HCO; and
- k. Resolving billing discrepancies with the servicing bank.

## 1.5.6 Approving Official (AO)

Approving Officials are primarily responsible for, but not limited to:

- a. Providing pre-approvals of cardholder transactions;
- b. Ensuring charges were accurate;
- c. Ensuring purchases were for official Government business;
- d. Ensuring funds are available;
- e. Ensuring cardholders reconcile transactions and statements within the reconciliation timeframe;
- f. Reviewing transactions for appropriate documentation;
- g. Reconciling and certifying monthly statements in the absence of the cardholder;
- h. Maintaining reconciliation files;
- i. Ensuring cardholders are current with all program training requirements;
- j. Maintaining copies of cardholder training certificates;
- k. Resolving questionable transactions with the cardholder;
- I. Requesting changes to cardholder accounts;
- m. Reporting changes in cardholder status and administrative changes to cardholder accounts;
- n. Ensuring cardholders report lost, stolen or compromised cards to the agency program coordinator; and
- o. Reporting suspected instances of waste, fraud, abuse and/or misuse;

#### 1.5.7 Alternate Approving Official

The alternate approving official serves as the approving official if the appointed approving official is unable to perform their assigned duties due to an extended absence.

#### 1.5.8 Cardholders

Cardholders are primarily responsible for, but not limited to:

- a. Making authorized purchases for official Government business only;
- b. Obtaining valid purchase requests with certified funds;
- c. Obtaining all required justifications and approvals;
- d. Complying with Federal, Departmental and Operating Unit laws, regulations, policies and guidance as it relates to use of the purchase card;
- e. Complying with spending limitations;
- f. Maintaining a monthly purchase card ordering log for all transactions;
- g. Maintaining transaction files in accordance with records retention requirements;
- h. Complying with internal control procedures;
- i. Reconciling accounts and disputing unresolved or invalid transactions;
- j. Safeguarding the purchase card and account information;
- k. Reporting unauthorized use, lost, stolen, or compromised cards;
- I. Complying with accountable property procedures; and
- m. Reporting suspected fraud, waste, abuse, and/or misuse.

#### **1.5.9 Convenience Check Writers**

Convenience check writers have the same responsibilities as cardholders in addition to the following responsibilities:

- a. Reviewing transactions against the bank statement and identifying any errors in the dollar amounts;
- b. Reviewing scanned images of canceled checks in servicing bank's electronic tool;
- c. Tracking outstanding checks that may appear as transactions on future billing statements;
- d. Maintaining convenience check transaction files in accordance with records retention; and
- e. Maintaining documentation to support use of convenience checks.

#### 1.5.10 Budget Officers/Financial Management Specialists

Budget officers and financial management specialists are primarily responsible for, but not limited to:

- a. Providing appropriate funding data for purchase card and convenience checking accounts;
- b. Maintaining accurate financial records; and
- c. Fulfilling financial management reporting requirements.

#### 1.5.11 Designated Billing Office/Finance Office

Designated Billing Office/Finance Offices are primarily responsible for, but not limited to:

- a. Making payment to the Department's servicing bank; and
- b. Notifying the APC of any billing discrepancies.

#### **END OF SECTION 1**

## **SECTION 2 – Establishing and Maintaining Accounts**

## 2.1 Training Requirements

Cardholders, approving officials, and agency program coordinators shall document satisfactory completion of required training prior to nomination and appointment to the purchase card program. In addition, cardholders, approving officials, and agency program coordinators shall certify in writing that they have read and understood the policies and procedures outlined in Commerce Acquisition Manual 1313.301.

#### 2.1.1 Single Purchase Limit up to the Micro-purchase Threshold

The single purchase limit for cardholders who are <u>not</u> in an acquisition position is generally the micro-purchase threshold. As defined in FAR 2.101, a micro-purchase is an acquisition of supplies or services, the aggregate amount of which does not exceed a threshold of \$3,000 except for acquisition of construction subject to the Davis-Bacon Act, the limit is \$2,000, and for acquisition of services subject to the Service Contract Act, the limit is \$2,500. The monthly billing cycle limit is \$10,000. Cardholders requesting a single purchase limit up to the micro-purchase threshold, agency program coordinators, and approving officials shall document satisfactory completion of the following training:

- GSA SmartPay® Online Training <u>https://training.smartpay.gsa.gov/</u>
- FAC-47: Micro-Purchases and Section 508 Requirements <u>https://www.atrrs.army.mil/faitas/</u>
- Servicing Bank Cardholder Training (username: cardholder, password: transaction) www.jpmorgan.com/visit/paymentnetfedcard
- Federal Strategic Sourcing Initiative for Office Supplies (FSSI OS3) <u>www.GSA.gov/os3</u>
- Commerce Purchase Card System (CPCS) Training (Check with your Agency Program Coordinator for course schedule)
- DOC Customized Purchase Card Training<sup>1</sup> <u>https://doc.learn.com/login</u>

#### 2.1.2 Single Purchase Limit above the Micro-purchase Threshold

Single purchase limits above the micro-purchase threshold shall be limited to warranted contracting officers. In addition to the training outlined in paragraph 2.1.1, cardholders requesting single purchase limits above the micro-purchase threshold shall satisfy all contracting officer warrant requirements as outlined in Commerce Acquisition Manual 1301.6 (Figure 2-1) and obtain a contracting officer's warrant issued by the Operating Unit Head of Contracting Office<sup>2</sup>. The maximum single purchase limit for cardholders who are not in the General Schedule 1102 contracting series or 1105 purchasing series is \$150,000.

Agency program coordinators and approving officials managing cardholder accounts with single purchase limits above the micro-purchase threshold shall meet all contracting officer training requirements outlined in CAM 1301.6, but are not required to obtain a contracting officer's warrant.

<sup>&</sup>lt;sup>1</sup>Check with your Agency Program Coordinator for information and schedule details on the in-classroom version of this course. <sup>2</sup>Commerce Acquisition Manual 1301.6: <u>http://www.osec.doc.gov/oam</u>

#### Figure 2-1 Contracting Officer Warrant Requirements

Warrant Level	Warrant Threshold Authority	Education	Experience	Training	FAC-C Level
Level I	In accordance with contract terms and conditions or a maximum of \$150,000.	4-year course of study leading to a bachelor's degree <b>OR</b> At least 24 semester hours from among the following disciplines: accounting, business, finance, law, contracts, purchasing, economics, industrial management, marketing, quantitative methods, or organization and management.	At least 1 year of contracting experience.	Core Courses • CON 100 or FCN 101 • CON 121 • CON 124 • CON 127 • FAC 023 • FAC 031 • CLC 057 • CLC 058 • CON 170 • Either CON 090 or FCN 190 80 CLPs every 2 years	Level I
Level 2	In accordance with contract terms and conditions or a maximum of \$1,000,000. Up to the limits established in FAR 12.203 when using commercial item procedures. Unlimited	<ul> <li>4-year course of study leading to a bachelor's degree</li> <li>OR</li> <li>At least 24 semester hours from among the following disciplines: accounting, business, finance, law, contracts, purchasing, economics, industrial management, marketing, quantitative methods, or organization and management.</li> <li>4-year course of study leading to a bachelor's degree that includes or is supplemented with at least 24 semester hours from among the following disciplines: accounting, business, finance, law, contracts, purchasing, economics, industrial management, marketing, quantitative methods, or organization and management.</li> </ul>	At least 2 years of contracting experience. At least 4 years of contracting experience.	Core Courses All Level I Training • CON 200 • CON 216 • CLC 056 • CON 270 • CLC 051 • HBS 428 • CON 280 • CON 290 80 CLPs every 2 years Core Courses All Level I and II Training • CON 360 • Select 1 Harvard Business School module (other than HBS 428) • Choose one of the following: ACQ 265 CON 252 ACQ 315	Level II
				ACQ 370 CON 370 • 32 hours of acquisition- related electives (may be 1 course or a series of courses but must be at least 8 hours in length). 80 CLPs every 2 years	

In addition to the education, experience, and training requirements, employees who are not employed by a contracting office shall meet the additional requirements outlined in CAM Chapter 1301.6 Section 4.8.

## 2.1.2.1 Training Waivers

The Senior Procurement Executive may waive the contracting officer training requirements on a case-by-case basis, for only agency program coordinators and approving officials managing cardholder accounts with a single purchase limit above the micro-purchase threshold, if the Operating Unit can demonstrate that internal controls are established and routine reviews are conducted by individuals with the requisite contracting officer training.

Regardless of cardholder account thresholds, agency program coordinators and approving officials cannot waive training requirements set forth in section 2.1.1 of this policy.

The Head of Contracting Office shall submit a written waiver request that includes:

- The name of the individual/organization requesting a training waiver;
- Description of internal controls;
- Review frequency; and
- Contracting officer training credentials (i.e., training certificates) of the individual(s)
  responsible for ensuring purchases made above the micro-purchase threshold are
  appropriately reviewed and meet all requirements subject to the FAR.

Waiver requests shall be submitted electronically to: PurchaseCardOversight@doc.gov.

#### 2.1.3 Training Providers

#### 2.1.3.1 Federal Acquisition Institute (FAI) Sponsored Training

The Federal Acquisition Institute manages the Acquisition Workforce Training Fund to ensure that equitable training opportunities are available for all civilian agencies. FAI uses the training fund to offer DAU-equivalent core training courses to civilian agency employees at no charge. Employees can view the current FAI course schedule and register for courses at <u>http://www.fai.gov/drupal/training/training</u>.

#### 2.1.3.2 Defense Acquisition University (DAU) Training

The Defense Acquisition University training courses are available to civilian agency employees at no charge. Employees can view the current course schedule and register for DAU training courses in the DAU catalog at: <u>http://icatalog.dau.mil/</u>.

## 2.1.3.3 DAU-Equivalent Training

Several training providers offer courses that have been certified equivalent to DAU curriculum courses. DAU-equivalent courses can be used to meet the core training requirements. A list of DAU-equivalent courses and training providers is located at: <u>http://icatalog.dau.mil/</u>.

#### 2.1.4 Refresher Training

Cardholders, approving officials, and agency program coordinators shall complete annual purchase card refresher training. Individuals are required to take the DOC Customized Purchase Card Refresher Training module<sup>3</sup> located on the Commerce Learning Center (CLC) website at: <u>https://doc.learn.com</u>. Refresher training shall be completed no later than July 30<sup>th</sup> each fiscal year. Failure to complete required refresher training will lead to suspension of cardholder and/or approving official purchase card accounts until training is successfully completed. Bureau Procurement Officials shall certify in writing refresher training status of individuals participating in the purchase card program. Written certification shall be sent to the SPE with a copy to the Office of Acquisition Management no later than August 31<sup>st</sup> of each fiscal year.

<sup>&</sup>lt;sup>3</sup> All 7 modules shall be completed in order to obtain a certificate.

## 2.2 Nomination Procedures

## 2.2.1 Nomination of Agency Program Coordinators

Senior Bureau Procurement Officials shall nominate prospective agency program coordinators that are responsible and possess the required business acumen to be entrusted with management and oversight of the purchase card program. Nominations shall be forwarded to the Head of Contracting Office and shall include applicable training certificates.

## 2.2.2 Nomination of Cardholders and Approving Officials

Operating Unit officials shall nominate prospective cardholders and approving officials<sup>4</sup> that have demonstrated they are responsible and possess the required business acumen to be entrusted with a Government purchase card. Nominations shall be forwarded to the agency program coordinator and shall include a written justification for issuance of a purchase card along with applicable training certificates and proposed single purchase and monthly spending limits. A sample nomination memorandum is provided in Appendix B. Disapproved nomination packages will be returned to the requesting official with an explanation for the rejection.

## 2.3 Delegation of Procurement Authority

#### 2.3.1 Agency Program Coordinator Delegation

The Heads of Contracting Office shall delegate authority to agency program coordinators to manage the day-to-day operations for the purchase card program for their Operating Unit by issuance of a Delegation of Procurement Authority memorandum. A sample delegation memorandum is provided in Appendix C.

## 2.3.2 Cardholder and Approving Official Delegation

Agency program coordinators shall review nominations and provide recommendation for approval or disapproval to their Head of Contracting Office. Upon approval of a nomination, the Head of Contracting Office shall delegate purchase card procurement authority to approving officials, and cardholders by issuance of a Delegation of Procurement Authority memorandum. Sample delegation memoranda are provided in Appendix C. Disapproved nominations shall be returned to the employee's supervisor with explanation for disapproval.

#### 2.4 Card Account Setup

#### 2.4.1 Purchase Card and Approving Official Accounts

Upon approval of a cardholder's and/or approving official's nomination package and issuance of delegated procurement authority by the Head of Contracting Office, the agency program coordinator will order a purchase card (for cardholders only), enter account profile data into the servicing bank's tool and provide user access information and guidance.

#### 2.4.2 Span of Control

Span of control refers to the extent of review responsibilities placed on a single approving official for the purchase card transactions of one or more cardholders. The number of cardholders assigned to an approving official should be reasonable, considering the volume of cardholder activity and the organizational structure, to enable an approving official to conduct reviews to ensure detection of possible cases of misuse and fraud. The approving official shall have direct knowledge of the cardholder's role and must have the ability to verify receipt of goods or services. In accordance with the recommendations of the Government Accountability Office (GAO) Audit Guide dated November 2003, all approving officials shall have a maximum of seven (7) cardholders unless authorization to exceed that maximum is received in writing from the Head of Contracting Office.

<sup>&</sup>lt;sup>4</sup>Operating units are encouraged to nominate prospective approving officials in cardholders' direct supervisory chain.

## 2.4.3 Separation of Duties

Separation of duties minimizes the risk of fraud and/or loss of property. The responsibilities of cardholder, approving official and agency program coordinator functions shall not overlap to ensure that management controls are not circumvented. Assignment of duties such as authorizing, approving, and recording transactions; receiving assets; approving cardholder statements; making payments; certifying funding; and reviewing or auditing shall be assigned to separate individuals to the greatest extent possible. In no instance shall an approving official be subordinate (organizationally) to a cardholder.

## 2.5 Account Maintenance

## 2.5.1 Changes in Cardholder Status

Upon change in cardholder status such as transfer, retirement, resignation or termination, cardholders shall stop using the card far enough in advance of their separation date, if possible, to allow outstanding transactions to be processed and reconciled before their separation. Cardholders shall destroy their card by cutting it in half and providing the destroyed card to their agency program coordinator or approving official, per bureau policy; advise the approving official of any outstanding transactions; provide the approving official with any remaining receipts or other documents related to outstanding transactions; and follow standard Operating Unit checkout procedures. Failure to comply with these procedures may result in a delay of official checkout. Approving officials shall determine when to close the account based on the outstanding transactions and shall notify the agency program coordinator. The agency program coordinator shall close the card account when it becomes apparent that a cardholder has separated from the Department, or their status has changed.

## 2.5.2 Changes in Approving Official Status

Upon change in approving official status such as transfer, retirement, resignation or termination, a new approving official shall be nominated and cardholder accounts shall be transferred. If it is not possible to establish a new approving official, cardholder accounts will be suspended. The agency program coordinator is responsible for ensuring that the new approving official receives and maintains the predecessor approving official's records. If there is no successor approving official, the agency program coordinator shall retain custody of the records.

## 2.5.3 Changes to Purchase Limits

Requests to change a cardholder's single purchase limit and/or monthly purchase limit shall be submitted by the approving official through the agency program coordinator to the Head of Contracting Office. Upon approval of changes to purchase limits, the Head of Contracting Office shall issue a new Delegation of Procurement Authority. Changes that would raise the cardholder's single purchase limit above the micro-purchase threshold require the cardholder to be warranted as outlined in 2.1.2.

Temporary changes to a cardholder's monthly purchase limit shall be submitted by the approving official through the agency program coordinator to the Head of Contracting Office. Approved temporary changes must be approved in writing by the HCO and time durations for the change shall be documented in the servicing bank's tool as well as the cardholder's file. Temporary changes shall not exceed one month. Changes exceeding one month are considered permanent, and shall be issued a new Delegation of Procurement Authority by the Head of Contracting Office.

## 2.5.4 Administrative Changes

Cardholders and approving officials shall notify their agency program coordinator in writing of any administrative changes such as name, address, or phone number. Upon written notification of administrative changes, the agency program coordinator shall make the appropriate change in the servicing bank's system.

## 2.5.4.1 Other Changes to Accounts

Requests for merchant category code changes shall be submitted in writing by the approving official to the agency program coordinator. If approved, the agency program coordinator will process the merchant category code change.

#### 2.6 Inactive Accounts

Accounts without any transactions within the preceding 18-month period are considered "inactive". Inactive accounts shall be canceled unless there are extenuating circumstances, such as a reasonable expectation of future purchase requirements, or a history of requirements that have irregular buying patterns. Agency program coordinators shall perform semi-annual reviews of purchase card usage within their organizations and identify purchase card accounts that appear to be inactive, other than cards specifically requested for emergency use. Agency program coordinators shall provide the list of inactive accounts to approving officials and request justification to retain the accounts. Failure to provide the required justification will result in cancellation of the inactive accounts. A sample Inactive Account Memorandum is provided in Appendix D.

## 2.7 Emergency Use Cards

Operating Units may request purchase cards for emergency use. Employees eligible to receive an emergency use card are those who have been designated as "emergency employees" or "mission-critical emergency employees" under an emergency response plan or continuity of operations plan. Requests for emergency use cards must contain an appropriate justification, citing the anticipated circumstances under which they would be used. These cards may be issued in advance of an emergency and placed with trained cardholders for use immediately upon declaration of an emergency. Cardholders with non-emergency cards may continue to use their cards during an emergency to purchase products and services in accordance with the limits on their cards.

#### 2.8 Suspension and Reinstatement

#### 2.8.1 Account Suspension

Cardholder and approving official accounts shall be suspended for improper card use; failure to carry out responsibilities; failure to complete the required refresher training; or upon direction by the approving official, Head of Contracting Office, Purchase Card Program Manager, or Senior Procurement Executive.

Approving officials may request account suspension (via written format – i.e., e-mail, memorandum) for cardholders who are expected to be away from the office for more than six consecutive weeks.

After suspension of a cardholder's account, the Head of Contracting Office shall revoke the cardholder's purchase card delegation of procurement authority. Upon suspension, the cardholder is responsible for destroying the card by cutting it in half and providing the cut card to their approving official.

Before taking this action, the agency program coordinator shall consider the impact of cardholder's account suspension on the affected organization and take appropriate steps to minimize any adverse impact.

#### 2.8.2 Reinstatement

Agency program coordinators may reinstate cardholder and approving official accounts that have been suspended or closed, based upon an assessment of the circumstances. Prior to reinstatement of accounts that have been deactivated, suspended, or terminated for more than 12 months cardholders and approving officials shall retake required training for purchases up to the micro-purchase threshold.

#### 2.9 Card and Account Security

Cardholders shall take appropriate precautions to protect the purchase card and account information. Cardholders are responsible for preventing others from gaining access to their cards or account information. Account information should be given only to vendors to complete a purchase transaction. Cardholders shall keep purchase cards and account information in a secured environment to prevent access by unauthorized personnel (i.e., locked desk drawer, or a locked safe – multiple cards are prohibited from being secured collectively). Cardholders shall not carry purchase cards on their person unless conducting an "over the counter" transaction. Cardholders may be held personally responsible for card and account misuse. The Head of Contracting Office may grant exceptions to cardholders whose positions require them to carry the purchase card on a continuous basis.

Cardholders shall exercise discretion in selecting reputable merchants in order to minimize the possibility of fraud. Prior to entering the purchase card number onto an internet website, the cardholder should ensure that the site is secure. Cardholders shall not transmit purchase card information over a facsimile machine.<sup>5</sup> Cardholders shall not permit copies of their purchase cards to be maintained by merchants.

#### 2.10 Lost or Stolen Cards

The cardholder shall report lost or stolen cards promptly to the servicing bank's customer service office, the approving official and the agency program coordinator. Stolen cards shall be immediately reported to the DOC Office of Security if the theft occurred at a DOC facility or to the local police department if the theft occurred off-site. A replacement card with a new account number will be issued, usually within 24 hours. If a lost card is found after receiving a replacement card, it shall be destroyed. The cardholder may be held accountable for failure to report the loss of a card.

Cardholders shall provide a written notice to the servicing bank that includes the following information:

- Card number;
- Cardholder's complete name;
- Date and location of the loss;
- Date reported to police (if stolen);
- Date and time the loss was reported to the servicing bank;
- List of any transactions made on the date the card was lost or stolen; and
- Any other relevant information describing the loss or theft.

#### END OF SECTION 2

<sup>&</sup>lt;sup>5</sup> The Department's Office of Privacy and Open Government (OPOG) permits the transmission of charge card data (i.e., travel, fleet) via facsimile; however purchase card data is *not* permitted to be transmitted by facsimile.

## SECTION 3 – Purchase Card Use

#### 3.1 Purchases at or Below the Micro-Purchase Threshold

The purchase card may be used by cardholders to make purchases that are otherwise authorized by Federal, Departmental and Operating Unit laws, regulations, policies or guidance.

<u>Cardholders shall not transfer their cards to or authorize their purchase card to be used by</u> <u>any person other person</u>. Cardholders shall comply with the following guidelines when making micro-purchases:

- Ensure purchases are allowable;
- Ensure availability of funds;
- Obtain required approvals;
- Distribute purchases equitably among qualified suppliers;
- Use Required Sources of Supplies and Services as set forth in FAR Part 8;
- Determine price reasonableness (i.e., obtain at least two prices from two different vendors);
- Do not split requirements;
- Do not exceed spending limits;
- To the maximum extent practicable, comply with requirements for Energy and Water Efficiency and Renewable Energy, use of Recovered Materials and Bio-based Products, and Contracting for Environmentally Preferable Products and Services as set forth in CAM Chapter 1323.70;
- Comply with Section 508 requirements as set forth in the Section 508 Rehabilitation Act (29 U.S.C.794d);
- To the maximum extent practicable, consider small businesses when making micro purchases; and
- Review vendor purchasing terms that may contain clauses that could result in an Anti-Deficiency Act violation (cardholders should consult with a Contract Law Division attorney as necessary).

#### 3.2 Purchases Above the Micro-Purchase Threshold

In accordance with FAR 13.301, the Government-wide commercial purchase card may be used above the micro-purchase threshold, by contracting officers, to place a task or delivery order (if authorized in the basic contract, basic ordering agreements, or blanket purchasing agreements, and Federal Supply Schedules); or make payments, when the contractor agrees to accept payment by the purchase card. Cardholders with delegated authority to use the purchase card above the micro-purchase threshold shall comply with all requirements of Federal and Departmental acquisition laws, regulations, policies and guidance with respect to any purchase that exceeds the micro-purchase threshold. The cardholder shall adhere to the requirements for competition, public notice, socioeconomic requirements, use of appropriate provisions and clauses, and all other applicable requirements.

#### 3.3 Allowable Purchases

The purchase card may be used to purchase commercially available supplies and services, including, but not limited to the items outlined in paragraphs 3.3.1 through 3.3.7 below.

#### 3.3.1 Subscriptions

The purchase card may be used for subscriptions such as magazines, journals, and technical data. Cardholders shall ensure that a subscription does not automatically renew.

## 3.3.2 Telecommunications Charges

The purchase card may be used for monthly cellular airtime, monthly pager service and other recurring telecommunications charges, as long as the fiscal year total for each type of service does not exceed the micro-purchase threshold for services purchased on the open market. If the aggregate amount exceeds the micro-purchase threshold in a fiscal year this service shall be referred to the servicing acquisition office for issuance of a contract.

## 3.3.3 Construction Services

The purchase of construction services including but not limited to, construction, alteration, or repair (including dredging, excavating, and painting) of buildings, structures, or other real property shall not to exceed \$2,000 aggregated within a fiscal year.

## 3.3.4 Training Courses

Training courses for individual or group training. In accordance with DOC Human Resource Bulletin #076, *How to Request Training and Development via the Commerce Learning Center (CLC)*, all cardholders shall have an approved Standard Form 182 Authorization, Agreement and Certification of Training prior to purchasing training. Customized training programs shall not be acquired using the purchase card.

## 3.3.5 Business Cards

The purchase card may be used to acquire business cards through the mandatory Federal Supply Schedule contract.

## 3.3.6 Conference Registration Expenses

The purchase of conference-related expenses such as registration fees (provided meals and/or lodging are *not* included), meeting spaces, audio and video equipment, or rental of booth space are authorized using the purchase card.

Cardholders shall not use the purchase card to pay for registration fees if conference registration includes meals and/or lodging. The DOC travel card is the appropriate method of payment for conference registration fees that include travel-related charges.

#### 3.3.7 Parking of Government Owned or Government Leased Vehicles

The purchase card may be used to purchase commercially available parking spaces for Government Owned and GSA Leased vehicles. Payment for monthly parking spaces is authorized if the amount does not exceed the micro-purchase threshold. If the aggregate amount exceeds the micro-purchase threshold in a fiscal year, the requirement shall be referred to the servicing acquisition office.

#### 3.4 Required Sources of Supplies and Services

Cardholders shall follow the required source of supplies and services of Federal Acquisition Regulations (FAR) Part 8. FAR Part 8 sets forth statutory requirements to acquire supplies and services from priority sources when available. Other sources should be considered for use only after the priority sources have been considered for fulfilling requirements. Cardholders should contact their acquisition office if they need assistance in determining if their requirement can be satisfied by a required source.

Cardholders shall satisfy requirements for supplies and services from the sources outlined in paragraphs 3.4.1 through 3.4.4.

#### 3.4.1 Purchase of Supplies

In accordance with FAR 8.002, except as required by section 3.4.3, or as otherwise provided by law, cardholders shall satisfy requirements for supplies from the following sources, in descending order of priority.

- Inventories of the requiring agency
- Excess from other agencies
- Federal Prison Industries, Inc.
- Supplies which are on the Procurement List maintained by the Committee for Purchase from People Who are Blind or Severely Disabled; and
- Wholesale supply sources such as stock programs of GSA, the Defense Logistics Agency or the Department of Veterans Affairs, and military inventory controls points.

#### 3.4.2 Purchase of Services

In accordance with FAR 8.002, cardholders shall satisfy requirements for services from the following sources, in descending order of priority, except as otherwise provided by law.

• Services which are on the Procurement List maintained by the Committee for Purchase from People Who are Blind or Severely Disabled.

#### 3.4.3 Use of Other Mandatory Sources

In accordance with FAR 8.003, cardholders shall satisfy requirements for the following supplies or services from or through specified sources, as applicable:

- Public utility services (FAR Part 41)
- Printing and related supplies (FAR Subpart 8.8)
- Leased motor vehicles (FAR Subpart 8.11)
- Strategic and critical materials (i.e., metals and ores) from inventories exceeding Defense National Stockpile requirements (detailed information is available from the DLA Strategic Materials)
- Helium (FAR Subpart 8.5 Acquisition of Helium)

#### 3.4.4 Use of Other Sources

In accordance with FAR 8.004, if cardholders are unable to satisfy requirements for supplies and services from the mandatory sources listed in sections 3.4.1, 3.4.2, or 3.4.3, cardholders are encouraged to consider satisfying requirements from or through the following sources <u>prior to</u> <u>considering the commercial market</u>.

- <u>Supplies</u>: Government acquisition contracts, multi-agency contracts, and any other procurement instruments intended for use by multiple agencies, including blanket purchase agreements (BPAs) under Federal Supply Schedule contracts (i.e., Federal Strategic Sourcing Initiative (FSSI) agreements.
- <u>Services</u>: Federal Prison Industries, Inc. and sources listed in section 3.4.1.

## 3.5 Strategic Sourcing Vehicles

Cardholders are strongly encouraged to leverage DOC's strategically sourced contracts. Per the order of preference outlined in sections 3.4.1 through 3.4.4, cardholders shall use strategic sourcing vehicles when purchasing applicable items. A list of the strategically sourced vehicles are available at: <u>https://connection.commerce.gov/instructions-and-procedures/department-commerce-strategic-sourcing</u>.

#### 3.5.1 Personal Computers and Accessories

Cardholders shall use the Department of Commerce Personal Computer (PC) and Accessories Blanket Purchase Agreement (BPA), per the order of preference outlined in 3.4.1 for all personal computer and accessories acquisitions. Heads of Contracting Office shall designate cardholders who are authorized to order from the BPA.

#### 3.5.2 Office Supplies

Cardholders within the Department of Commerce shall use the Federal Strategic Sourcing Initiative Office Supplies vehicle when ordering office supplies. Blanket exceptions are only applicable for *PaperClips* stores located at Commerce Headquarters (Hebert C. Hoover Building) and Census Bureau Headquarters (Suitland, MD). Other *PaperClips* stores (i.e., Department of Defense location) are not automatically excepted.

## 3.6 Information Technology (IT) Products and Services

All acquisitions for IT products and services<sup>6</sup> must include an executed *IT Compliance in* Acquisition Checklist located at: <u>http://home.commerce.gov/cio/ITSITnew/IT\_Security\_Tools.html</u>.

#### 3.7 Green Procurement Program Requirements

Cardholders shall purchase green products and services to the maximum extent practicable, consistent with the requirements of FAR Part 23, Commerce Acquisition Manual 1323.70, *Department of Commerce Green Procurement Program*, and Federal green procurement preference programs. Programs covered under the Green Procurement Program include:

- Recovered Materials Products;
- Bio-based Products;
- Energy Efficient Products;
- Electronic Product Environmental Assessment Tool Products;
- Water Efficient Products;
- Non-Ozone Depleting Products; and
- Environmentally-Preferable Products and Services.

#### 3.8 Section 508 Rehabilitation Act Requirements

Cardholders shall comply with the Section 508 Rehabilitation Act requirements by ensuring that requesting officials provide the required determinations and adequately documenting purchase card files. A sample Electronic and Information Technology Procurement Checklist for Section 508 compliance is provided in Appendix E. Approving officials should ensure cardholder compliance when reviewing and approving cardholder documentation of purchases.

## 3.9 Card Restrictions

## 3.9.1 GSA Government-wide Restrictions

In accordance with the GSA SmartPay® Program, the purchase card shall not be used for the following:

- Long-term rental or lease of land or buildings (long-term is generally defined as one year or more);
- Travel or travel-related expenses;
- Fleet or fleet-related expenses; and
- Cash advances.

<sup>&</sup>lt;sup>6</sup> BIS, NOAA, NTIA, and OS purchase requests for IT systems, equipment and software shall be reviewed by their cognizant OCIO prior to purchase to determine if the purchase request is "covered" for Supply Chain Risk Management (SCRM) purposes [Procurement Memorandum 2014-03, *Supply Chain Risk Management Restrictions on Information Technology Acquisitions – Interim Guidance (Phase 1)*].

#### 3.9.2 Departmental Restrictions

Department of Commerce regulations and policies prohibit the purchase of supplies or services that should be placed on a travel card<sup>7</sup> or fleet card<sup>8</sup>, including the purchase of gas or repairs for Department-owned or leased vehicles.

## 3.9.3 Federal Appropriations Law Restrictions

In accordance with principles of Federal Appropriations Law, the following items are generally prohibited from purchase with appropriated funds. As there may be authorized exceptions for certain items, cardholders shall obtain approval from the HCO, after legal review, and document the exception prior to purchase of any of the following items.

- Entertainment: Entertainment includes, but is not limited to, food and drink, receptions, banquets, music and artistic performances.
- **Food and Water**: The General Accounting Office (GAO) has held that in a variety of cases under the "necessary expense rule," appropriated funds should not be used to pay for subsistence or to provide "free food" to government employees while at their duty stations. As such, bottled water and food items considered personal expenses.
- Fines and Penalties: Fines and penalties include, but are not limited to parking tickets and personal fines.
- **Gifts and Awards**: Gifts and awards or any type of item provided to honor employees (i.e., plaques, certificates, awards).
- **Personal Expenses and Furnishings**. Personal expenses and furnishings include, but are not limited to: convenience items, decorative items, clothing apparel, commuting expenses, personal membership fees, and personal qualification expenses.

#### 3.9.4 Non-Appropriated Funds

Non-appropriated funds are permitted for activities that support the Department's mission. Prior to purchase, cardholders shall obtain legal review to ensure the purchase is suitable. Cardholders shall ensure that proper documentation is recorded as required under Section 3.13.

#### 3.9.5 Approvals Required Prior to Purchase

Cardholders shall obtain approval from their approving official and budget officer prior to making purchases. The items outlined in Figure 3-1, require additional approvals prior to purchase. Cardholders shall ensure that all required approvals are received and copies of mandatory documentation maintained in their purchase card transaction files.

Purchase Requirement	Approval Required from	Reference
Paid Advertisements in newspapers (other than for recruitment of personnel)	Head of Contracting Office	DAO 208-2
Printing and Duplicating (exceeding the capacity of an office printer or copy machine) (includes printing, binding, blank	Operating Unit (OU) Printing Coordinator (for Census, NIST, NOAA, PTO and NTIS).	FAR 8.802(b) All Government printing must be procured through established Government channels. Refer to

Figure 3-1 Purchases Requiring	g Additional Approvals Prior to Purchase
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<sup>&</sup>lt;sup>7</sup> Use of the purchase card to acquire subway access (farecards, SmarTrip card reloads, etc.), taxi fares, rental shuttles, cars, vans, and buses for use by employees to accomplish <u>local</u> travel on official business is permitted. Use of the purchase card for other than official business is prohibited and could result in the cardholder facing disciplinary and criminal penalties.

<sup>&</sup>lt;sup>8</sup> Purchases of gas or oil for other than Department owned or leased vehicles are permitted (i.e. generators and/or small engines).

Purchase Requirement	Approval Required from	Reference
work, composition, plate making, presswork, binding and micrographics as well as related supplies that are used and equipment that is usable in printing and binding operations).	All others, contact DOC Office of Administrative Operations <b>Exception:</b> Operating Units outside of the Washington, D.C. metropolitan area, not serviced by an OU Printing Facility, may utilize their Regional Government Printing Office (GPO) without consulting with their operating unit Printing Coordinator. These OUs must utilize their Regional GPO or request a waiver from their regional GPO office, prior to utilizing an open-market source.	Printing Coordinator for specific information.
GPO Express The Government Printing Office (GPO) has awarded a contract (950-S) to FedEx Kinko'sSM Office and Print Services that allows all U.S. Federal agencies direct access to services at FedEx Kinko'sSM locations nationwide.	Operating Unit Printing Coordinator (for Census, NIST, NOAA, PTO and NTIS). All others, contact DOC Office of Administrative Operations.	GPO Circular Letter 625, dated September 22, 2006. This circular letter allows GPO to bill government purchase cards for use in conjunction with the GPOExpressSM Program.
Publication of scientific/research articles in professional journals	Operating Unit Printing Coordinator (for Census, NIST, NOAA, PTO and NTIS). All others, contact DOC Office of Administrative Operations	Per the Office of Administrative Operations
Kitchen Appliances (e.g. coffee pot, refrigerator, microwaves etc.)	Operating Unit building management official.	GAO Decision B-302993, Use of Appropriated Funds to Purchase Kitchen appliances, June 24, 2004.

## 3.10 Card Decline

If the purchase card is declined, cardholders shall contact the servicing bank's customer service office or the agency program coordinator for assistance. The servicing bank's customer service phone number is located on the back of the card. APC's shall monitor card decline reports for questionable, suspicious, or fraudulent activity.

## 3.11 Receipt and Acceptance of Supplies and Services

Operating Units shall establish independent receipt and acceptance or subsequent review of items obtained with a purchase card. Cardholders shall arrange for immediate inspection of supplies to ensure orders are complete and items are in acceptable condition. Cardholders shall maintain delivery receipts and other paperwork regarding the transaction.

## 3.11.1 Partial Deliveries

If partial deliveries are received, cardholders shall contact the merchant to determine the status on the remainder of the shipment. If delivery of remaining supplies will take more than 30 days, cardholders shall request a credit to their account. If the partial delivery becomes a dispute, the cardholder shall follow the servicing bank's dispute procedures.

## 3.11.2 Damaged or Unacceptable Supplies

Cardholders shall promptly return any damaged or unacceptable supplies. If the merchant agrees to replace the item and the new item is acceptable, the cardholder should authorize payment in

accordance with normal procedures. If the merchant refuses to replace the item, the cardholder should follow dispute procedures.

#### 3.11.3 Returning Supplies to Merchant

Cardholders shall return damaged or unacceptable merchandise to the merchant for issuance of a credit to the purchase card. Cash refunds shall not be accepted. If the merchant is unwilling to issue a credit, cardholders shall follow the servicing bank's dispute procedures.

## 3.12 Reporting Accountable Property

When purchasing accountable or personal property with a unit cost of \$5,000 or more (e.g., lab equipment, scientific equipment, etc.), or "sensitive" items regardless of cost (i.e., computer equipment, DVDs, televisions, etc.) as referred to in the Department of Commerce Personal Property Management Manual, section 3.201, *Accountable Personal Property* and section 3.401, *Sensitive Items,* cardholders shall forward the appropriate documentation approved for procurement to their Property Official. A copy of all acquisition documentation must be included in the cardholder's transaction file.

## 3.13 Recordkeeping and Documentation

## 3.13.1 Purchase Card Ordering Log

Cardholders shall use the DOC finance purchase card ordering log within the Commerce Purchase Card System (CPCS). Operating Units that reconcile transactions directly through the servicing bank shall use the purchase card log located inside the servicing bank tool to record transactions made at the time of purchase. A printed copy of the ordering log must be included in the monthly reconciliation file.

#### 3.13.2 Transaction File Documentation

The cardholder shall maintain a file for each purchase card and/or convenience check transaction. Transaction files shall be accessible for review purposes and shall include, at a minimum:

- Request for purchase with available funds, signed and dated by the requestor;
- Required pre-approvals in accordance with section 3.9.5 (sample checklist located in Appendix M);
- Documentation of all post-purchase actions (sample checklist located in Appendix N):
  - Copy of online transaction, itemized receipts, and/or faxed verification of order;
    - Delivery receipt or packing slip;
    - Copy of appropriate Departmental property forms, if accountable personal property; and
    - Memorandum to the file to explain any unique circumstances for the transaction, as applicable.

Transaction files shall be retained for a minimum of three years from final payment for transactions at or below the micro-purchase threshold and six years and three months for transactions above the micro-purchase threshold.

## 3.13.3 Third Party Processors and Transactions

Third party credit card processors (i.e., PayPal, Groupon, and Amazon) shall only be used when no other merchant can supply the product or service or meet delivery, quantity, or quality requirements, and the merchant in question will accept payment only through the third-party processor.

The use of third party processors is strongly discouraged because there is a greater risk of abuse, issues involving disputed transactions, and difficulty identifying and reconciling transactions. It

may be difficult to reconcile the purchases because the transaction may appear under the name of the third-party processor instead of the merchant name.

If third party transactions are made, cardholders shall document the purchase card transaction file with the name of the merchant, the name of the third-party processor, the amount of the transaction, and a brief statement explaining why it was necessary to purchase the product or service from that merchant.

To avoid risks of misuse and abuse, agency program coordinators shall review and monitor a sample – at least 1%, of third party transactions on a monthly basis to ensure cardholders and convenience check writers use third party vendors appropriately and accurately document transaction files.

## 3.14 Reconciliation of Account

#### 3.14.1 Cardholder Responsibilities

Cardholders shall compare each transaction listed on the purchase card ordering log with the itemized statement. Cardholders shall research transactions that are recorded on the monthly purchase card ordering log but fail to appear on the purchase card statement of account. Cardholders shall ensure that appropriate accounting codes are assigned to each transaction; certify the statement of account by signing and dating it; ensure all transaction files, purchase card ordering logs and statements of account are in the reconciliation files, and forward the reconciliation files to their approving officials immediately upon completion.

The reconciliation files shall include, in addition to the items outlined in section 3.13.2:

- Purchase card ordering log;
- Statement of account, signed and dated by cardholder;
- Printed copy of reconciliation; and
- Monthly transaction files.

If a cardholder knows in advance that they will be absent for the entire reconciliation period and not able to reconcile the Statement of Account, the cardholder shall forward the transaction files to the approving official. The approving official shall reconcile and sign a copy of the statement for the reconciliation file. Failure of the approving official to reconcile an absent cardholder's account may cause all cardholder accounts under their purview to be suspended by the agency program coordinator. In the event the cardholder's approving official cannot reconcile the cardholder's transactions due to a lengthy absence, an alternate approving official shall be nominated and delegated authority to approve the purchase in the interim.

#### 3.14.2 Approving Official Responsibilities

Approving officials shall ensure cardholders reconcile all transactions on the Monthly Purchase Card Ordering Log with the Statement of Account; review cardholder statements and verify that all items are for official Government use and comply with all applicable laws, regulations, policies and guidance; ensure cardholder has completed and submitted required property documentation to the appropriate property office; resolve any outstanding questions, verify, approve, and sign cardholder Statements of Account; and retain cardholder files for 3 years from final payment for transactions at or below the micro-purchase threshold and 6 years and 3 months for transactions over the micro-purchase threshold.

#### 3.14.3 Disputed Transactions

Cardholders shall process disputes or questioned transactions using the servicing bank's online disputes process<sup>9</sup>. If, after receipt of requested copies of the sales slip, the cardholder still does

<sup>&</sup>lt;sup>9</sup>Operating Units serviced by the Commerce Purchase Card System (CPCS) must also process disputes in CPCS.

not recognize the charge, the cardholder shall contact the agency program coordinator for assistance. The cardholder shall follow up on incorrectly billed items immediately with the merchant, as there is a 90-day time limit on reconciling disputed items.

#### 3.15 Personal Liabilities

Cardholders and approving officials shall ensure that purchases made with the purchase card are in accordance with all Federal, Departmental and Operating Unit laws, regulations, policies and guidance. Cardholders and approving officials may be held personally liable for any action deemed by the reviewing official as noncompliant with laws, policies and regulations. In addition, if it is determined the transactions are made with the intent to commit fraud or constitute waste or abuse, the cardholder and approving official may face disciplinary actions under Department Administrative Order (DAO) 202-751, *Discipline*, and applicable Government-wide administrative procedures, including suspension and termination of employment.

## 3.16 FastPay Procedures

The Office of Financial Management (OFM) has authorized the use of FastPay for the payment of charge card accounts. Servicing finance offices may pay the invoices prior to receipt of Statements of Account in order to maximize rebates.

## 3.17 Refund Management

In accordance with Office of Management and Budget (OMB) Circular A-123 Appendix B, proper management of refunds is critical to ensuring that agencies maintain cost-effective charge card programs. In order to ensure that the Department is in the best position to maximize sales and productivity refunds it is important to ensure timely payments and initiate internal controls to ensure that appropriate purchase card use is maximized.

Unless specific statutory authority exists allowing refunds to be used for other purposes, refunds must be returned to the appropriation or account from which they were expended, and can be used for any legitimate purchase by the appropriation or account to which they were returned, or as otherwise authorized by statute.

#### **END OF SECTION 3**

## **SECTION 4 – Convenience Checks**

#### 4.1 Policy

Convenience checks shall only be used when no other merchant can supply the product or service or meet delivery, quantity, or quality requirements, and the merchant in question and for use with merchants that do not accept purchase cards, for emergency incident response, and for other Department approved purposes that comply with Public Law 104-134, the Debt Collection Improvement Act of 1996. <u>Convenience checks shall not be issued to merchants that accept the Government Purchase Card</u>.

Convenience checks issued under the Purchase Card Program are subject to all regulations and restrictions of the purchase card. The training, nomination, account setup and delegation procedures for the purchase card apply to convenience checks. Convenience check writers shall use the servicing bank's electronic access system on-line ordering log, statements and reports.

Convenience checks are not electronic funds transfer compliant, are subject to a cash advance fee, and have a greater potential for fraud and abuse. Therefore, the use of convenience checks shall be minimized and should only be issued on a case-by-case basis. Heads of Contracting Offices shall encourage the use of alternatives to convenience checks as well as other services provided by the servicing bank.

#### 4.2 Convenience Check Restrictions

Convenience checks shall not be used by individuals to write checks to themselves, or to any other individual or vendor for any of the following:

- Vendors who accept the purchase card;
- Cash advance or re-imbursement purposes;
- Salary payment or cash awards, or any transaction required to be processed through the payroll system;
- Employee reimbursements;
- Travel-related expenditures including tickets, meals, lodging and rental or lease of vehicles;
- Advance payments to vendors;
- Hazardous materials;
- Honorarium fee to a non-U.S. citizen or permanent resident alien not authorized to receive this payment in accordance with the terms and conditions of their visa;
- On-the-Spot awards; or
- Incentive awards to contractors or contract employees.

#### 4.3 Convenience Checks for Foreign Invitational Travel

Convenience checks may be issued for travel-related tickets (Contiguous United States (CONUS) and Outside the Contiguous United States (OCONUS)) for expenditures including meals, lodging, and rental or lease of vehicles for foreign invitational travelers and foreign guest speakers.

In addition to the transaction documentation for convenience checks set forth in section 3.13.2 of this policy, a copy of the invitational travel order, the request for the advance, a copy of the travel voucher, and method of repayment (if any) shall be included in the transaction file.

#### 4.4 Utilizing Convenience Checks

Convenience checks may only be written for the exact amount of the purchase. The Purchase Card Log must include, at a minimum:

- Check number,
- Merchant name,
- Merchant's Tax Identification Number,
- Merchant address,
- Items purchased,
- Total dollar amount, and
- Reason why a convenience check was used.

Purchase Card Log information may be stored electronically in the servicing bank's electronic access system. Cardholders shall maintain a log of the checks issued to them and perform an inventory monthly to ensure that no checks are missing. Missing checks shall be reported immediately to the servicing bank. Cardholders shall update the servicing bank's electronic access system accordingly.

#### 4.5 Oversight Review of Convenience Checks

Agency program coordinators shall conduct a 100% review of all convenience check transactions utilizing the servicing bank's electronic access system. The servicing bank's automated rules based data mining system provides electronic monitoring, email notification, and online review and documentation of questionable convenience check transaction details on a daily basis. Approving officials and agency program coordinators shall monitor and review online reports and match questionable transactions to authorization documentation.

Approving officials and agency program coordinators shall monitor the number of checks issued to merchants on a fiscal year basis to identify merchants with five or more convenience check transactions and make referrals to the servicing bank for possible charge card acceptance. Agency program coordinators shall continuously monitor convenience checks using the following automated online statistical reports and dashboard metrics:

- Total number of individuals authorized to write convenience checks;
- Total number of convenience checks written;
- Number of checks written over the micro-purchase threshold;
- Number of checks written under the micro-purchase threshold;
- Number of checks written to the same merchant;
- Ratio of check writers to approving officials;
- Number of cash advances or convenience checks written to "Cash"; and
- Number of checks written for foreign invitational travel and guest speakers.

#### END OF SECTION 4

## **SECTION 5 – Program Oversight and Surveillance**

## 5.1 Management Controls

The purchase card program includes a variety of management controls designed to minimize purchase card misuse. Agency program coordinators shall ensure that management controls under their purview are followed and appropriately used to reduce potential card misuse and abuse.

## 5.2 Risk Management

The Office of Acquisition Management has established the Purchase Card Risk Management team to provide program expertise and support to help minimize risk of the purchase card program. The team shall be comprised of an agency program coordinator representative from each contracting office and the DOC Purchase Card Program Manager shall serve as chairperson. The purchase card risk management team shall meet at least quarterly to discuss recommended improvements to the program.

Agency program coordinators shall take actions to reduce the risk of card fraud, waste, abuse, and misuse. Approving officials and agency program coordinators can minimize risk by ensuring that Federal, Departmental and Operating Unit purchase card policies, laws, regulations, and procedures are followed, and that program effectiveness is monitored on a regular basis. Appendix F identifies typical purchase card factors that may result in elevated risk, along with recommended risk reduction methods. Approving officials and agency program coordinators should regularly assess their card programs to identify additional areas of risk and develop adequate risk mitigation strategies.

## 5.3 Reviews, Surveillance and Reporting

Purchase card data and statistics are important tools for managing the program and monitoring performance. The servicing bank's automated rules based data mining system provides the capability to electronically monitor and review cardholder transaction details on a daily basis. APCs shall use the data mining tool to ensure and maintain the highest level of oversight visibility over the Department's purchase card program. The servicing bank provides a variety of reports to assist agency program coordinators with managing their program. Appendix G provides a list of standard card management reports available in the servicing bank's system. Agency program coordinators shall continuously monitor their programs using the following metrics:

Purchase Card Statistical Reporting Metrics:

- Number of cards;
- Number of cards that are for emergency use only;
- Number of active accounts;
- Number of accounts with convenience checks;
- Percentage of employees that are cardholders;
- Net number of new accounts (new less cancelled);
- Charge card dollars spent; total refunds earned; percentage of potential refunds earned;
- Number of cases reported to the agency Office of Inspector General for possible card misuse and/or abuse;
- Number of administrative and/or disciplinary actions taken for card misuse;
- Number of approving officials;
- Ratio of approving officials to purchase cardholders (span of control);
- Average number of monthly purchase card transactions reviewed per approving official;
- Number of cardholders with authority up to the micro-purchase threshold;
- Number of cardholders with authority over the micro-purchase threshold;
- Number and dollar amount of purchases up to the micro-purchase threshold;

- Number and dollar amount of purchases over the micro-purchase threshold;
- Number of inactive accounts;
- Number of inactive accounts cancelled; and
- Number of inactive accounts requiring a justification to maintain in an active status.

**Convenience Checks Statistical Reporting Metrics:** 

- Total number of individuals authorized to write convenience checks;
- Total number of convenience checks written;
- Number of checks written over the micro-purchase threshold;
- Number of checks written under the micro-purchase threshold;
- Number of checks written to the same merchant;
- Ratio of check writers to approving officials; and
- Number of cash advances or convenience checks written to "Cash".

#### 5.4 Data Mining

Generally, data mining (sometimes called data or knowledge discovery) is the process of analyzing data from different perspectives, and categorizing, and summarizing the relationships into useful management informational reports and graphical displays. APCs may use the servicing bank's automated data mining tool to analyze and electronically monitor daily transactional data to present potentially relevant results to decision makers. The automated data mining tool serves an essential internal control program function. It improves surveillance by highlighting selected transactions for APC review.

#### 5.4.1 Merchant Category Code Surveillance

The data mining tool monitors, on a real-time basis, questionable or unauthorized merchant category codes for potential fraud, waste, abuse and misuse; split disbursements; and purchase card policy compliance. Figure 5-1 is a list of merchant category codes that are typically unauthorized for purchase card use:

Questionable or Unauthorized					
Merchant Category Codes (MCC)           MCC         Description         MCC         Description					
WICC	Description	WICC	Direct Marketing - Catalog Merchants		
3000-			(Includes Victoria Secret/Chadwick's of		
3299	Airlines	5964	Boston/Lilian Vernon		
3351-	Annies	3304			
3441	Car Rentals	5967	Direct Marketing - On Line Dating Services		
3501-					
3780	Hotels	5972	Stamp and Coin Stores		
4411	Steamship and Cruise Lines	5977	Cosmetic Stores		
4722	Travel Agencies/Tour Operations	6211	Security Brokers/Dealers		
			Hotels/Motels/Resorts (Not Elsewhere		
4829	Wire Transfer/Money Orders	7011	Classified)		
		7210-			
5541	Service Stations	7299	Personal Services		
	Men's and Boy's Clothing &				
5611	Accessory Stores	7338	Quick Copy, Repro, Blueprint		
		7829-	Video Tape Rental Stores/Theatrical Ticket		
5621	Women's Ready to Wear Stores	7929	Agencies/Bands/Orchestras		
	Women's Accessory and Specialty	7932-			
5631	Stores	7999	Recreational Establishments		
		8011-	Doctors/Dentists/Hospitals/Nursing/Chiropract		
5641	Children's and Infant's Wear Stores	8099	ors		
5651	Family Clothing Store	8111	Legal Services/Attorneys		
5681	Furriers and Fur Shops	8351	Child Care Services		
5719	Miscellaneous Home Furnishings	8398	Charitable Organizations		

#### Figure 5-1 Unauthorized Merchant Category Codes

5811-			
5814	Restaurants/Bars/Caterers/Fast Food	8651	Political Organizations
5921	Package Liquor Stores	8661	Religious Organizations
	Used Merchandise/Secondhand		
5931	Stores	8699	Membership Organizations
5932	Antique Shops	8999	Professional Services
			Court Costs (Includes Alimony & Child
5933	Pawn Shops	9211	Support)
5944	Jewelry Stores	9222	Fines
		9223	Bail and Bond Payments

#### 5.5 Fraud Waste Abuse and Misuse

Employees are required to report all instances of suspected fraud, waste, abuse, and misuse. Intentional or unintentional violations of the policies and procedures for purchase card or convenience check usage is considered misuse. Fraud is a criminal form of misuse involving willful deceit, misrepresentation of facts, or other practices designed to harm or deprive another of his or her rights, usually involving deception for personal gain. The distinction between fraud, waste, abuse and misuse is dependent upon the facts of each case.

All participants in the purchase card program are responsible for preventing fraud and the conditions that lead to fraud. Fraud often occurs when two or more individuals collude to circumvent the management controls in place to prevent fraudulent practices. Collusion may occur between merchants and cardholders, cardholders and approving officials, or between purchase card program participants and other employees.

#### 5.5.1 Indicators of Fraud Waste Abuse and Misuse

Suspected purchase card fraud, waste, abuse and misuse often have the same or similar indicators. A determination of whether the misuse is fraudulent may only be possible after a thorough investigation. Therefore, all suspected cases must be reported. Agency program coordinators shall review bank purchase card data and reports on a regular basis to identify and investigate possible instances of fraud, waste, abuse and misuse. The following are examples of potential indicators of fraud, waste, abuse and misuse:

- Repetitive purchases from the same merchant in situations where the cardholder should be rotating purchases among more than one merchant;
- Missing purchase documentation;
- Cardholders or approving officials who allow others to use the card;
- Failure to safeguard purchase cards, convenience checks, or account information;
- Lack of oversight and surveillance;
- Unauthorized purchases;
- Payments made for items that were never received;
- Split purchases made to avoid spending limits;
- Failure to account for nonexpendable or sensitive items per property management procedures;
- Approval of cardholder purchases by someone other than the approving official;
- Cardholders returning items to a merchant for a store credit instead of a credit to their purchase card account;
- Attempted purchases that exceed the cardholder's limits;
- Purchases that have been declined by the card system; and
- Cash advances or convenience checks written to "Cash".

#### 5.5.2 Reporting Suspected Fraud Waste Abuse and Misuse

Employees are responsible for reporting cases of suspected fraud, waste, abuse and misuse of the purchase card or convenience checks. Employees who suspect a cardholder of fraud, waste, abuse and misuse must immediately notify the approving official and the agency program

coordinator. Agency program coordinators, upon learning of suspected fraud, waste, abuse and misuse shall notify the Office of Inspector General, the Head of Contracting Office, the servicing bank, and their supervisory chain. Immediate actions shall be taken to ensure that all instances of suspected fraud, waste, abuse and misuse are promptly reported and investigated.

APCs may use the case management tool in the servicing bank's electronic access system to report, and track suspected fraud, waste, abuse and misuse cases to ensure accurate Office of Management and Budget quarterly reporting. The OIG may use the case management tool when conducting purchase card audits and fraud investigations.

#### 5.5.3 Potential Consequences for Purchase Card Fraud Waste Abuse or Misuse

Violations of purchase card laws, regulations, policies and guidance may result in immediate suspension of the card and disciplinary action against the cardholder, approving official, or both. The range of disciplinary actions, which may vary with the severity of the infraction, will be applied in accordance with DOC employee relations, legal, and management guidelines.

Intentional misuse of the card will be considered an attempt to commit fraud against the U.S. Government, and in addition to the disciplinary actions, the individual may be subject to a fine of not more than \$10,000, or imprisonment for not more than 5 years, or both under 18 U.S.C. 287.

Cardholders who intentionally misuse their cards may be held personally liable to the Government for the amount of any unauthorized transactions, plus interest and debt collection fees. Approving officials or others who collude with cardholders to misuse the card or to commit fraud, or who use their position or authority to cause misuse of the card, may also be subject to the disciplinary and criminal actions above.

Figure 5-2 lists potential consequences and penalties for fraud, waste, abuse and misuse of the purchase card. Agency program coordinators shall use the table as a guide for disciplinary measures, coordinating with the Office of Inspector General, Office of General Counsel, Office of Human Resources Management, and the employee's supervisory chain as appropriate.

Consequences for Purchase Card Fraud Waste Abuse and Misuse			
Infraction	Potential Consequences for Infraction		
Fraud, Waste, and Abuse	Card cancellation		
Intentional use of the purchase card for unauthorized	<ul> <li>Termination of employment</li> </ul>		
purchases or the approval of unauthorized transactions	<ul> <li>Fines and/or imprisonment</li> </ul>		
	<ul> <li>Salary offset to collect full cost of unauthorized purchases including administrative expenses</li> </ul>		
False Statements	Card cancellation		
False statements on purchase card records by cardholders and AO's	<ul> <li>Reprimand</li> </ul>		
Personal Misuse	Counseling		
Unintentional use of the purchase card for unauthorized purchases	<ul> <li>Cardholder payment to DOC required to cover full cost of unauthorized purchases and possible administrative expenses</li> </ul>		
Card Transfers	Counseling		
Transfer of purchase card to any person other than the	<ul> <li>Card suspension</li> </ul>		
cardholder	<ul> <li>Card cancellation</li> </ul>		
Failure to Maintain Card Security	Counseling		
Failure to safeguard physical location of the card and	<ul> <li>Card suspension</li> </ul>		
card account information	<ul> <li>Card cancellation</li> </ul>		

Figure 5-2 Consequences for Purchase Card Misuse and Abuse

#### SECTION 6 – Program Review and Reporting

#### 6.1 **Program Reviews and Reports**

Heads of Contracting Offices shall follow procedures outlined in this policy to conduct their reviews. Reviews shall be conducted monthly and quarterly to ensure that cardholders and approving officials adhere to applicable requirements. The primary objectives of the reviews are to assess:

- Compliance with laws, regulations and the Department's purchase card policy;
- Efficiency of operations; and
- Adequacy of internal or management controls to help prevent fraud, waste and abuse.

#### 6.1.1 Monthly/Quarterly Reviews and Reports

At the end of each billing cycle for the previous month, Heads of Contracting Office shall report on the status of the following purchase card elements: cardholder single purchase limits; convenience check transactions (100% review); third party vendor transactions (a minimum of 1% review); transactions where sales tax appears to be applied; and any transaction that has been identified as suspicious or unusual.

All monthly reports are due on the 20<sup>th</sup> of each month. If the 20<sup>th</sup> falls on a weekend, the report is due the following Monday (The month prior report is due the 20<sup>th</sup> of the following month – i.e. October report due November 20<sup>th</sup>). Monthly reports shall be completed using the reporting template found in Appendix H and uploaded in the Office of Management and Budget's (OMB) Max portal.

#### 6.1.2 Quarterly Reports

Heads of Contracting Offices shall review the purchase card program quarterly. The following steps shall be adhered in conducting quarterly program reviews:

- OAM shall use the servicing bank's electronic tool to generate a random sample of cardholder and approving official's transactions. This sample will be provided to APCs for quarterly review.
- APCs shall notify the program office of upcoming reviews and discuss the review objectives and methods to be used.
- The Purchase Card Management Review Checklist shall be completed by the agency program coordinator and approved by the Head of Contracting Office. The *Purchase Card Management Review Checklist* (Appendix J) documents the initial review of approving officials' and cardholders' transactions and records to determine compliance with procurement buying policies, regulations and procedures.
- Interviews shall be held with approving officials and cardholders to discuss how the purchase card program is working.
- APCs shall notify program offices of review findings and address strengths, weaknesses and recommendations for improvement.

- Summary of findings shall be completed by the agency program coordinator and approved by the Head of Contracting Office. Upon completion of all review checklists and interviews, the agency program coordinator shall complete the *Purchase Card Management Review Summary* and *Report* (Appendix K and Appendix L) for the Head of Contracting Office's review and approval. The report documents strengths, weaknesses and areas of non-compliance identified in the checklists. The report must summarize any areas of concern or problems found during any aspect of the review and discuss what steps shall be taken to correct them. Specific examples should be cited whenever possible.
- The Head of Contracting Office may use the Purchase Card Management Review Summary and Report to discuss issues not addressed on the checklists, interviews or review of records, such as whether the card provider and the merchants are providing acceptable customer service.

#### 6.2 Office of Acquisition Management Reviews

The Office of Acquisition Management may perform additional reviews (including on-site reviews), as necessary.

#### 6.3 Annual Charge Card Program Report

The DOC Purchase Card Program Manager is required to review the Department's Purchase Card Program annually following the close of each fiscal year and prepare a report. The report should include:

- Review, analysis, and recommendations for implementing innovative charge card management solutions and workflow processes to:
  - Improve management internal control over the purchase card program;
  - Strengthen oversight;
  - Streamline purchase card management processes; and
  - Demonstrate program trends.

#### END OF SECTION 6

APPENDICES

## **APPENDIX A – DEFINITIONS**

<u>Abuse</u> – Use of a Government charge card or convenience check to buy authorized items, but at terms (e.g. price, quantity) that are excessive, or are for a questionable Government need or both.

<u>Accountable Personal Property</u> – Accountable personal property includes a property purchased, leased (capital leases), or otherwise obtained having a unit acquisition cost of \$5,000 or more; land, regardless of cost; and items that are sensitive, including to but not limited to pilfer-able items.

<u>Agency Program Coordinator</u> – An individual who serves as the focal point for purchase card administration including establishing and maintaining accounts, and issuance and destruction of cards.

<u>Anti-Deficiency Act</u> – Federal statute that prohibits the purchase of goods or services for which funds are unavailable or have not been appropriated.

<u>Approving Official</u> – An individual responsible for oversight and monitoring of one or more designated cardholder's compliance with established regulations and procedures.

**<u>Bank (or Cardholder) Statement</u>** – The official monthly statement provided by the servicing bank to cardholders. The bank statement identifies all of the cardholder's purchase card transactions during the billing cycle.

**<u>Business Line</u>** – A group of charge card activities with common functional characteristics (i.e., Purchase, Travel, and Fleet).

<u>Cardholder</u> – An individual to whom a card is issued to buy goods and services in support of official Government business.

<u>Cardholder Account</u> – An account established for an authorized employee against which official Government charges can be made.

<u>Cardholder Reconciliation</u> – The process by which the cardholder and the approving official reviews the monthly bank statements and reconciles against available supplier receipts and purchase card ordering logs.

<u>**Charge Card</u>** – A plastic card, issued to an individual or an entity, with an underlying account that is used for making purchases or payments. A charge card is similar to a credit card, except that generally the balance must be paid in full upon receipt of the statement.</u>

<u>Commerce Bankcard Center (CBC)</u> – Located in Kansas City, Missouri, the CBC provides primary support for the operation and administration of the DOC Purchase Card Program.

**<u>Commerce Purchase Card System (CPCS)</u>** – The Department of Commerce financial system used for reconciliation and payment of purchase card transitions.

**Construction** – means construction, alteration or repair (including dredging, excavating, and painting) of buildings, structures, or other real property. For purposes of this definition, the terms "buildings, structures, or other real property" include, but are not limited to, improvements of all types, such as bridges, dams, plans, highways, parkways, streets, subways, tunnels, sewers, mains, power lines, cemeteries, pumping stations, railways, airport facilities, terminals, docks, piers, wharves, ways, lighthouses, buoys, jetties, breakwaters, levees, canals, and channels. Construction does not include the manufacture, production, furnishing, construction, alteration, repair, processing, or assembling of vessels, aircraft, or other kinds of personal property (except that for use in FAR Subpart 22.5, see definition at FAR 22.502).

<u>Construction, alteration, or repair</u> means all types of work done by laborers and mechanics employed by the construction contractor or construction subcontractor on a particular building or site of work. This includes altering, remodeling, installations (if appropriate) on the site of work of items fabricated off-site; painting and decorating; manufacturing or furnishing materials, articles, supplies, or equipment on the site of work; transportation of materials and supplies between the site of work, and a facility which is dedicated to the construction of the building or work and is deemed part of the site of work; and transportation of portions of the building or work between a secondary site where a significant portion of the building or work is constructed, which is part of the site of work, and the physical place or places where the building or work will remain (FAR Subpart 22.4).

<u>Continuity of Operations Planning (COOP)</u> – COOP is the effort within departments and agencies to ensure the continued performance of minimum essential functions during a wide range of potential emergencies.

<u>Contracting Officer</u> – Individuals delegated authority by the Senior Bureau Procurement Official to enter into, administer, and/or terminate contracts and to make related determinations and findings.

**<u>Convenience Check</u>** – A check that may be written on an approved cardholder's purchase card account, within established single purchase limits.

<u>Convenience Check Log</u> – A listing which includes, at a minimum, the convenience check number, the merchant's name, the merchant's Tax Identification Number (TIN) a or Employer Identification Number (EIN), merchant address, items purchased, total dollar amount and the reason why a convenience check was used.

**<u>Customer</u>** – Individual responsible for defining the requirement, submitting a purchase request with available funds, and completing required approvals.

<u>Cycle Limit</u> – The spending limit imposed on a cardholder's cumulative purchases in a given cycle.

**Delegation of Procurement Authority Memorandum** – A memorandum that recognizes the purchase card holder as a procurement official, grants authorization to spend Government funds, and establishes the level of purchase authority.

**<u>Declined Transaction</u>** – A transaction for which authorization has been refused by the purchase card issuing bank's transaction authorization system.

**Designated Billing Office** – The payment office within a Federal agency that receives the "official invoice," which is a consolidated report listing all cardholder charges for the area the office serves. Treasury Financial Manual, Sect. 4520 Definition of Terms.

<u>Electronic Access System (EAS)</u> – The servicing bank's Internet-based system which provides a variety of reports which assist in the effective management of the Purchase Card Program.

<u>Electronic Commerce</u> – The integration of electronic-based systems to support common business processes. For example, the purchase card contractor will provide invoices electronically to Federal agency designated billing offices and accept payments electronically from Federal Government payment centers, and will provide electronic access to account data and reports (Treasury Financial Manual, Sect. 4520 Definition of Terms).

**<u>Environmental "Green" Purchasing</u>** – The acquisition of supplies and services that promotes energy and water efficiency, advances the use of renewable energy products, and helps foster markets for emerging technologies.

**<u>Federal Acquisition Regulation (FAR)</u>** – The regulation for use by federal executive agencies for acquisition of supplies and services with appropriated funds, as set forth in 48 CFR § 1-52.

**<u>Fraud</u>** – Any act of corruption or attempt to cheat the Government or corrupt the Government's agents, including but not limited to, the use of Government charge cards to transact business that is not sanctioned, not authorized, not in one's official Government capacity, not for the purpose for which the card was issued, or not as part of official Government business.

<u>GSA SmartPay®</u> – The Federal Government's charge card program that provides Federal Government cardholders a means to pay for commercial goods and services, travel and travel-related expenses, and vehicle fleet expenses.

<u>Head of Contracting Office (HCO)</u> – Individual designated by the Senior Bureau Procurement Official to head the contracting offices within each operating unit that has designated contracting authority to award and administer contracts to the full limit of the Department's contracting authority.

**Improper Purchase** – Purchase card transactions that are intended for Government use but are not permitted by law, regulation, or organizational policy.

**Internal Controls for the Purchase Card Program** – Measures taken to ensure program integrity, safeguarding of account information, and program effectiveness. Internal controls consist of the policies, procedures, training, organization, and surveillance governing the purchase card program.

<u>Merchant Category Code (MCC)</u> – A four-digit code used to identify the type of business a merchant conducts (e.g., gas stations, restaurants, airlines).

<u>*Micro-Purchase*</u> – As defined in FAR 2.101, an acquisition of supplies or services, using simplified acquisition procedures, the aggregate amount of which does not exceed the micro-purchase threshold.

<u>*Micro-Purchase Threshold*</u> – As defined in FAR 2.101 is an aggregate amount which does not exceed \$3,000, except in the case of construction subject to the Davis Bacon Act, the limit is \$2,000, and for acquisitions of services subject to the Service Contract Act, the limit is \$2,500.

<u>**Misuse</u>** – Use of a federal charge card or convenience check by an authorized user for other than the official Government purpose(s) for which it is intended. Purchase card misuse can invoke DOC disciplinary action.</u>

**Operating Units** – The following entities are considered operating units, as defined in Department Organization Order (DOO) 1-1 and in the Orders establishing the respective operating unit: Bureau of Economic Analysis (BEA), Bureau of Industry and Security (BIS), Bureau of Census (Census), Economic Development Administration (EDA), Economic and Statistics Administration (ESA), International Trade Administration (ITA), Minority Business Development Agency (MBDA), National Institute of Standards & Technology (NIST), National Oceanic & Atmospheric Administration (NOAA), National Telecommunications & Information Administration (NTIA), National Technical Information Services (NTIS), Patent and Trademark Office (PTO), and the Office of the Secretary.

**<u>Purchase Card Ordering Log</u>** – A manual or automated log in which the cardholder documents the individual transactions and screening for mandatory sources of supply, consideration regarding "green" purchasing, and any required Section 508 documentation when using the purchase card or associated convenience checks.

**<u>Required Sources of Supplies and Services</u>** – The priority of sources for procuring supplies and services as listed in the Federal Acquisition Register (FAR) 8.002, 8.003, and 8.004.

**<u>Retention of Documents</u>** – The storing of supporting documentation for purchase card transactions below the micro-purchase threshold for a period of 3 years in accordance with FAR 4.805 and GAO-08-368R. Transactions above the micro-purchase threshold shall be maintained for a period of 6 years and 3 months in accordance with FAR 4.805.

<u>Section 508 of the Rehabilitation Act</u> – Section 508 of the Rehabilitation Act of 1973 requires that Federal departments and agencies procure electronic and information technology in such a manner as to allow Federal employees with disabilities to have access to and use of information and data that is comparable to the access to and use of information and employees.

<u>Senior Bureau Procurement Official (BPO)</u> – The senior career procurement official within each operating unit that has been delegated contracting authority.

<u>Senior Procurement Executive (SPE)</u> – The official appointed pursuant to Executive Order 12931 and the Services Acquisition Reform Act of 2003 to carry out the responsibilities identified in both Executive Order and the Services Acquisition Reform Act. Pursuant to DOO 20-26, Director for Acquisition Management, the Director of
Acquisition Management is the Senior Procurement Executive for the Department of Commerce.

<u>Servicing Bank</u> – The financial institution and its associations, responsible for issuing DOC purchase cards as the result of a task order against the active GSA SmartPay® 2 Master Contract is JP Morgan Chase Bank and MasterCard association.

<u>Separation of Duties</u> – A mandatory management control to prevent key functions from being done by the same person. Important duties, such as making purchases, authorizing payments, certifying funding and reviewing/auditing will be assigned to different individuals to minimize the risk of loss to the Government to the greatest possible extent.

<u>Simplified Acquisition</u> – An acquisition of supplies or services conducted in accordance with the procedures of FAR Part 13. The Simplified Acquisition Threshold is currently \$150,000.

<u>Single Purchase Limit (Dollars per Transaction Limit)</u> – The dollar limit imposed on a cardholder's single purchase or payment transaction.

<u>Split Purchase</u> – Separating a requirement that exceeds a cardholder's single purchase limit or threshold into two or more buys to the same vendor as a means of circumventing the cardholder's purchase limit.

<u>Statement of Account</u> – Official document of all transactions (debits and credits) at the cardholder level posted during the billing cycle. The statement of account is not the official invoice.

<u>Strategic Sourcing</u> – The process of continually analyzing the way funds are spent in order to ensure DOC is making efficient and effective purchases by: leveraging sourcing power by seeking opportunities to achieve discounts on commonly purchased goods and services; and applying discounts to all charge card transactions, as appropriate.

<u>Third Party Processor</u> – A third party processor is a company that can accept credit card payments over the internet on behalf of an individual or another merchant (i.e., PayPal).

Warranted Contracting Officer - See Contracting Officer definition.

<u>Waste</u> – Any activity taken with respect to a Government charge card that fosters, or results in, unnecessary costs or other program inefficiencies.

# **APPENDIX B – SAMPLE NOMINATION MEMORANDUM**

Date:

MEMORANDUM FOR:	Agency Program Coordinator
THROUGH:	[Approving Official, if Cardholder Nominee]
FROM:	[Supervisor of Nominee]
SUBJECT:	Nomination of Government-wide Purchase Card [Holder or Approving Official]

[*Name of Nominee*] is hereby nominated for a [*Government-wide purchase card or Approving Official authority*] in accordance with Commerce Acquisition Manual (CAM) 1313.301. [*Name of Nominee*] is a current, permanent full-time Department of Commerce employee and has demonstrated that he/she is responsible and possesses the required business acumen to be entrusted with the responsibilities of a Governmentwide purchase card.

[Provide justification explaining the need for the cardholder or AO including whether the new cardholder or AO will have emergency response or COOP responsibilities.]

[Name of Nominee] has completed all required training as outlined in CAM 1313.301 and copies of training certificates are attached. Relevant information for this nomination is as follows:

Name of Nominee: \_\_\_\_\_

Office Telephone Number: \_\_\_\_\_

Office Fax Number:	

Mailing Address: \_\_\_\_\_

Single Limit: \_\_\_\_\_ (for cardholder nominee only)

30-Day/Cycle Limit: \_\_\_\_\_

Line of Accounting (ACCS Codes) \_\_\_\_\_

Number of cardholders, including this nominee, under Approving Official's authority:

# APPENDIX C – SAMPLE DELEGATIONS OF AUTHORITY MEMORANDA

## Agency Organization Program Coordinator (APC) Delegation of Authority Memorandum

MEMORANDUM FOR:	
	Agency Program Coordinator
FROM:	;
	Head of Contracting Office

SUBJECT: Delegation of Procurement Authority for Agency Program Coordinator

In accordance with the Commerce Acquisition Manual (CAM) 1313.301, you are hereby appointed as Agency Program Coordinator under the Department of Commerce's Purchase Card Program for \_\_\_\_\_\_ (*insert Operating Unit.*). Under this appointment, you are hereby delegated authority to manage the day-to-day operations for the Purchase Card Program under the GSA SmartPay® Program.

As an Agency Program Coordinator (APC), you shall not perform the duties and responsibilities of a cardholder, convenience check writer, or Approving Official.

As APC, your responsibilities include, but are not limited to, the following:

- Analyze, research, resolve and provide responses to incoming questions and issues.
- Establish, manage, suspend, and/or terminate accounts.
- Manage Merchant Category Codes (MCC). Perform oversight functions, including review of MCCs notifying the HCO of questionable transactions identified.
- Provide training and guidance to all Operating Unit Approving Officials and cardholders, as well as maintaining records on completed training.
- Assist with developing Operating Unit-specific purchase card training. The training shall be unique to specific programs and not conflict with the GSA SmartPay®2 Master Contract or CAM 1313.301.
- Perform oversight activity of the Government Purchase Card. Conduct annual review/audit of Approving Official and cardholder records for adherence to the policies and guidance set forth in the FAR, CAR, CAM and Operating Unitspecific policy.
- Report suspected fraud, waste and abuse to the HCO and OIG. Procedures for submitting reports to the OIG shall be in accordance with DOC DAO 207-10 "Inspector General Investigation."
- Request deviations to the Government Purchase Card policies in the CAM, as

- necessary.
- Terminate or suspend accounts at the request of the HCO when suspected fraud and/or abuse are apparent. Recommend the termination of the Delegation of Procurement Authority or Approving Official appointment.
- Upon the approval of the HCO, authorize increases to 30-day spending limit. The HCO shall issue an amended Delegation of Authority memorandum and provide a copy to the APC and the AO.

The delegation may be terminated at any time by written notice by the HCO or Senior Bureau Procurement Official.

#### APC SIGNATURE/DATE

[Your signature indicates that you have read, understand and agree to comply with your APC role and responsibilities. Please sign, date and return the original to your Head of Contracting Office. Retain one copy for your file and provide one copy to the Level 1 APC.]

### Purchase Cardholder Delegation of Authority Memorandum

MEMORANDUM FOR:		
	Cardholder	
FROM:		
	Head of Contracting Office	
SUBJECT:	Delegation of Procurement Government-wide Purchase	

In accordance with Federal Acquisition Regulation (FAR) Subpart 1.6 and Commerce Acquisition Manual 1313.301, you are hereby appointed as a cardholder under the Department of Commerce's Purchase Card Program. Under this appointment, you are hereby delegated authority to make official purchases for your organization using the Government-wide Purchase Card under the GSA SmartPay® Program at the limitations established below:

Single Purchase Limit:

□ Micro-purchase Threshold (\$3,000 except for the acquisition of construction subject to the Davis Bacon Act, the limit is \$2,000, and the acquisition of services subject to the Service Contract Act, the limit is \$2,500 or

□ \$\_\_\_\_\_ for purchase of all products, and for services not subject to the Service Contract Act [Amount not to exceed \$3,000]

□ \$\_\_\_\_\_ for purchase of construction [Amount not to exceed \$2,000]

Delegated authority to issue Convenience Checks for official purchases

Monthly (Billing Cycle) Purchase Limit: \$\_\_\_\_\_

 Additional restrictions, limits, or conditions on card use as specified below: [List any additional restrictions on card use here]

#### Emergency Use Cards:

□ Employee has been designated as "emergency employees" or "mission-critical emergency employees" under an emergency response plan or continuity of operations plan and requires an emergency use card.

Your Delegation of Purchase Card authority is governed by the FAR, CAR, Commerce Acquisition Manual (CAM) 1313.301, *Department of Commerce Purchase Card Program and any Operating Unit Polices and or Guidance*. Your Statement of Account with supporting documentation shall be reviewed by your Approving Official on a monthly basis.

The Approving Official who will review and approve all purchases made under this delegation is:

• Approving Official [Name, Address, Phone, E-mail]

Your Agency/Organization Program Coordinator (APC) is:

Agency Program Coordinator [Name, Address, Phone, E-mail]

With this Delegation you assume a unique role as the Government's authorized agent to obligate Government funds. Your role as the cardholder is to use the purchase card to buy goods and services for Government use. You hold the primary responsibility for the proper use of the purchase card. This is a substantial responsibility that must be exercised with fairness, reasonableness and good business judgment. The fact that your office has requested this authority for you is a clear statement of the trust that the Department of Commerce has placed in you. Your responsibilities as a cardholder are to:

Read and follow the Commerce Acquisition Manual (CAM) 1313.301, *Department of Commerce Purchase Card Procedures and any Operating Unit Polices and or Guidance*.

- Secure the card.
- Maintain a purchase card ordering log.
- Use the card only to make informed buys of approved goods and services.
- Ensure availability of funds before purchase.
- Ensure that the total amount of the transaction, including packaging, shipping, etc., does not exceed the single purchase limit or the amount of funds available for the transaction.
- Reconcile and document transactions.
- Use the card ethically.

You are the Government's legal agent for each purchase made with the purchase card. You are legally responsible and accountable for each transaction. You must comply with all applicable regulations and procedures set forth in CAM 1313.301 *and any Operating Unit Polices and or Guidance*.

This delegation of purchasing authority is limited and is not subject to re-delegation by you. The delegation may be terminated at any time by written notice from the Agency Program Coordinator, the Head of Contracting Office, the Director, Office of Acquisition Management, or by the Office of the Procurement Executive.

I further certify that I:

 will only use the card and/or convenience checks for official purchases, within the dollar limitations designated for my card, and only when sufficient funds are available

- will only purchase authorized products or services, and will seek guidance from the APC before making a purchase in any case where doubt exists as to the legitimacy of a purchase
- will protect the card and/or convenience checks from unauthorized use, and will immediately report the loss or theft of the card/checks in accordance with DOC procedures
- will surrender the card and/or convenience checks upon termination of employment and or elimination of purchasing responsibilities at any time upon the request of the APC
- will comply with all audit requests in a timely manner
- understand that willful misuse of the card and/or convenience checks may result in immediate cancellation of the card/checks and disciplinary action against me
- will not transfer or authorize my purchase card to be used by any person

RECEIPT ACKNOWLEDGED (Signature):	DATE:
-----------------------------------	-------

### Approving Official's Certification

I certify that I:

- will examine all cardholder documentation related to card and/or convenience check transactions to ensure that purchases are based on a bona fide need
- will resolve any questionable purchases with the cardholder and document records showing questioned transaction, investigation conducted and resolution of that investigation including disciplinary action taken or referral to the OIG
- will ensure that the cardholder's purchase transactions are properly reconciled with the servicing bank's statement of account
- will immediately notify my APC of any suspected cases of misuse or fraud

Approving Official Signature: \_\_\_\_\_ DATE: \_\_\_\_\_

# Approving Official (AO) Delegation of Authority Memorandum

MEMORANDUM FOR: \_\_\_\_\_\_ Approving Official

FROM:

Head of Contracting Office

SUBJECT: Delegation of Procurement Authority for Approving Official

In accordance with Commerce Acquisition Manual (CAM) 1313.301, you are hereby appointed as an Approving Official (AO) under the Department of Commerce's Purchase Card Program for \_\_\_\_\_\_ (*insert Operating Unit.*). Under this appointment, you are hereby delegated authority to ensure that cardholder transactions are appropriate and authorized under the GSA SmartPay® Program for official Government business.

As Approving Official your responsibilities include, but are not limited to, the following:

- Review and approve cardholder transactions for appropriate documentation to ensure purchases made by cardholders under your purview are accurate and for official Government business;
- Review and approve cardholder purchase card transactions;
- Report changes in cardholder status and administrative changes to cardholder accounts;
- Reconciling and certifying monthly statements in the absence of the cardholder;
- Ensure cardholders are current with all program training requirements and maintain copies of cardholder training certificates;
- Resolve questionable transactions with the cardholder;
- Ensure cardholders reconcile transactions and statements within the reconciliation timeframe and maintain reconciliation files; and
- Report suspected waste, fraud or abuse of purchase cards to the APCs and the Office of the Inspector General.

The delegation may be terminated at any time by written notice by the HCO or Senior Bureau Procurement Official.

Approving Official Signature	Date

[Your signature indicates that you have read, understand and agree to comply with your Approving Official role and responsibilities. Please sign, date and return the original to your Head of Contracting Office. Retain one copy for your file.

# APPENDIX D – STATUS OF INACTIVE PURCHASE CARD Status of Inactive Purchase Card

Date <sup>.</sup>	
Date.	

MEMORANDUM FOR:

Approving Official

FROM:

Agency Program Coordinator

SUBJECT: Purchase Card ending in \_\_\_\_\_. Cardholder: \_\_\_\_\_

A recent review of purchase card activity indicates that the subject card may be inactive based on the following:

- Card had no activity during the past 18 months
- Card had transactions totaling \$\_\_\_\_\_ from \_\_\_\_\_ to \_\_\_\_\_.

Please review the subject card and complete, date, and sign this form and return it to your APC by \_\_\_\_\_\_. Failure to complete this form will result in cancellation of the card.

### **Approving Official Determination**

I have reviewed this purchase card and have determined the following:

- Card is no longer needed and should be canceled for the following reason:
- Cardholder has transferred to another office or has left the organization
- Cardholder no longer wants to retain the card
- There are no requirements to justify need for a card
- Requirements are being satisfied by another cardholder or through other means
- Other (explain)
- Card is still required for the following reason:
- Card is to be used for emergencies. The cardholder has been designated as an "emergency employee" or a "mission-critical emergency employee" under an emergency response plan or continuity of operations plan (COOP).
- Office requirements exist but demand patterns are highly variable. Estimated use is \$\_\_\_\_\_\_ during the next 6 months. Indicate the major types of products or services that are anticipated to be ordered during the next 6 months.
- Other (explain)

Approving Official: \_\_\_\_\_

Signature: \_\_\_\_\_

Date :\_\_\_\_\_

# **APPENDIX E – SECTION 508 COMPLIANCE CHECKLIST**

Requisitioner	Requisition Number
Program Office	Sec 508 Coordinator Review
Product Description	

#### **Pre-Award Action for EIT Procurements**

Check all appropriate boxes.

#### **Exemptions to Section 508**

Back-Office (i.e. comm. Closets type-equipment) Acquired Incidental to the Contract (e.g. is not part of the deliverables of the contract Commercial Non-Availability Fundamental Alteration (e.g. adding a large display on a pager or palm pilot)

#### Subparts and Categories for Section 508 Compliance

Subpart B – Technical categories of standards (may include more than one) Software applications and operating systems (36 CFR Part 1194.23) Web-based internet and intranet information and application (36 CFR Part 1194.22) Telecommunication products (36 CFR Part 1194.23) Video and multi-media products (36 CFR Part 1194.24) Self-contained, closed products (36CFR Part 1194.25) Desktop and portable computers (36 CFR Part 1194.26)

Subpart C – Functional performance criteria (only when Subpart B does not apply) Subpart D – Information, Documentation, and support Documentation requirements

Market Analysis for Section 508 Compliance		
Products available, but they do not meet any c	of the appropriate standards	
Product(s) compliant		
Limited product availability (one product meets	s more 508 standards than others)	
(Attach analysis)		
Only one product meets functional specificatio	ns (attach justification)	
Requisitoner	Date	_
Approving Official	Date	

# **APPENDIX F – PURCHASE CARD RISK FACTORS**

Purchase Card Risk Factors			
Risk Factor	Description	Recommended Risk Reduction Methods	
General risk of fraud, waste, abuse and misuse	Ensure that the environment is not conducive to purchase card fraud, waste, abuse, and misuse.	<ul> <li>Conduct regular surveillance and annual reviews of all AOs and cardholders. Ensure that all violations are promptly identified and that corrective and/or disciplinary actions are taken.</li> <li>Publicize serious violations and the actions taken in response.</li> <li>Ensure that separation of duties exist so that an individual is not performing two or more purchase card functions for a transaction (cardholder and AO, AO and billing official, independent receipt and acceptance, etc.)</li> <li>Ensure that cardholders and AOs receive all necessary training and refresher training commensurate with their purchase limits.</li> <li>APCs and AOs shall ensure that appropriate authorities are requested and that no transactions using emergency authorities are utilized until specific delegation of that authority has been given by the CFO/ASA and communicated to the Operating Unit(s) by OAM.</li> </ul>	

Purchase Card Risk Factors				
Risk Factor	Description	Recommended Risk Reduction Methods		
Newly appointed AOs and cardholders	Newly appointed AOs and cardholders have less experience with the purchase card program's policies and procedures and may therefore have a higher risk of errors or misuse.	<ul> <li>Perform a limited review of all new AOs and cardholders within 90 days of their appointment to identify procedural errors or misuse.</li> </ul>		
Purchase card accounts that have few or no merchant category restrictions	Card accounts with few merchant category restrictions provide more flexibility for cardholders but may increase the risk of unauthorized purchases.	<ul> <li>Based on the types of products and services the card is being used to purchase, consider adding merchant category code restrictions to the account.</li> <li>Review cardholder transactions for suspicious purchases and follow up as necessary.</li> <li>Conduct periodic spot checks to ensure compliance.</li> </ul>		
Purchase card accounts with many transactions at or near the cardholder's single purchase limit	This could be an indicator that purchases are being split in order to bring them under the cardholder's limit.	<ul> <li>Review cardholder transactions for suspicious purchases and follow up as necessary.</li> </ul>		
Purchase card accounts where the individual transaction amounts are significantly below the cardholder's single purchase limit	This could indicate that the cardholder has greater purchase authority than they require for their typical purchases.	<ul> <li>Consider reducing the cardholder's purchase limit consistent with their purchase needs.</li> <li>When establishing new card accounts, ensure that single purchase limits reflect actual needs rather than automatically defaulting to the micropurchase limit.</li> </ul>		
Inactive cards (except for emergency cards issued under COOP)	Cards with little or no activity over a 18 month period are considered inactive. Cards that are issued solely as a backup card for another cardholder are prohibited.	<ul> <li>Conduct review of inactive cards semi-annually and cancel cards that are no longer required.</li> <li>Cardholders cannot have an AO who is organizationally below them (e.g., AO cannot oversee a cardholder who is the AO's supervisor).</li> </ul>		

Purchase Card Risk Factors				
Risk Factor	Description	Recommended Risk Reduction Methods		
Purchase card transactions during emergencies or other contingencies	Purchase card transactions occurring during emergencies (natural disasters, biological, radiological, chemical, health- related, etc.) pose a higher risk.	<ul> <li>Use servicing bank's data mining tool to separate, track, and identify all card purchases in support of emergency operations for anticipated reporting requirements to Congress, GAO, IG, etc.</li> <li>Ensure AOs and cardholders are advised of any changes to purchase card procedures or changes to authority levels as a result of the emergency.</li> <li>Conduct spot checks during the emergency for compliance, and postevent reviews of transactions.</li> <li>Ensure AOs and cardholders are promptly alerted when the emergency is over and any special emergency procedures or authorities revert to normal.</li> </ul>		
AOs with a span of control of seven or more cardholders	As an AO's span of control and monthly transaction review increases, the risk of failure to identify improper purchase transactions increases.	<ul> <li>If problems due to workload are identified during the annual review, consider reducing the span of control by training and appointing additional AOs as necessary.</li> <li>Conduct more frequent spot checks or surveillance of AOs with spans of control of seven or more.</li> </ul>		
APCs with a span of control greater than 350 AOs and cardholders	APCs with more than 350 AOs and cardholders assigned to them may find it difficult to adequately carry out their program oversight role effectively, thereby increasing risk.	<ul> <li>HCOs should monitor APC spans of control and establish additional APCs as warranted.</li> <li>APCs should review the agency oversight and surveillance process and risk reduction approach for adequacy, and recommend any needed improvements.</li> </ul>		
AOs or cardholders that have had previous instances of misuse	AOs and cardholders that have violated procedures in the past may have a higher risk of future violations	<ul> <li>Increase surveillance and spot checks to ensure compliance.</li> <li>Cancel cards for cardholder repeat offenders, or train and assign new AOs for repeat AO violations.</li> </ul>		

Purchase Card Risk Factors			
Risk Factor	Description	Recommended Risk Reduction Methods	
Convenience check users	Convenience checks pose a greater risk of misuse because they have fewer controls over their use.	<ul> <li>Conduct more frequent spot checks for convenience check users.</li> <li>Ensure that convenience checks are adequately safeguarded and transactions are properly logged and identified.</li> <li>Review convenience check usage and cancel checks for users that no longer require them.</li> </ul>	
Cardholders who are a higher grade than their AO	This situation is discouraged, and AOs should be at an equivalent or higher grade level. However, when organizational circumstances prevent this, there is a higher risk that the cardholder may exert undue influence over the AO's actions due to the disparity in grade or position.	<ul> <li>Increased surveillance of cardholder transactions.</li> <li>Conduct spot checks of AOs and cardholders to ensure compliance with policies and procedures.</li> <li>Immediately suspend card if abuse or misuse in observed. Report abuse or misuse to the IG.</li> </ul>	
Cardholders who are physically or geographically removed from an office environment or their AO	Cardholders whose duties require them to be "on the road" or to operate outside of a typical work environment may pose a higher risk of card abuse or misuse.	<ul> <li>Increased surveillance of cardholder's transactions with follow-up of questionable purchases.</li> </ul>	
AO absence	The cardholder's AO is absent due to leave, illness, temporary assignment, etc. This situation may lead to improper purchases if cardholder believes transactions will not be reviewed by a trained AO.	<ul> <li>APCs should temporarily assign cardholders to another AO to review transactions.</li> <li>AOs should notify the A/OPC when an absence of more than 30 days is expected.</li> </ul>	

# **APPENDIX G- STANDARD PURCHASE CARD REPORTS**

Report Name	Туре	Report Description
45-Day	Accounts	The 45-Day report can be used to monitor delinquencies as it identifies accounts that are between 1-30 days past due or 31-60 days past statement. The report lists: Hierarchy, Account Number, Account First Name, Account Last Name, Account Status, Status Reason, 1-30 Days Past Due*/31-60 Days Past Statement Date, Number of Days Past Due, Bill Date and Current Balance.
Account and Employee Hierarchy	Accounts	The Account and Employee Hierarchy report shows the card and account hierarchies for all individuals. The report displays all employees – both cardholders and non-cardholders. It groups by User ID and displays the individuals' names and roles, as well as card account numbers where appropriate. Please note that if the report is run using Hierarchy ID as a criterion, that criterion will apply to the employee and not the accounts that belong to the employee. However, the user should not be allowed to enter a criteria or view employees/accounts outside his/her scope of view.
Account Audit	Accounts	The report will provide all changes made to an account over a selected date range. This report contains the following columns: Hierarchy ID, Hierarchy Description, Account Number, Cardholder Last Name, Cardholder First Name, Change Date, Change Time, Field Name, Previous Value, New Value, and Modified By. If the user does not specify any criteria, the report will default to the last 7 calendar days of activity.
Account Cycle Activity with High Balance	Accounts	The Account Cycle Activity with High Balance report displays the last 12 completed cycles of account activity and identifies the highest balance for an account during the last 12 cycles. The report includes: Lowest Level Hierarchy ID, Lowest Level Hierarchy Description, Account First Name, Account Last Name, Second Row of Embossing, Account Number, Account Status, Card Open Date, Employee ID, User ID, Credit Limit, Segment Description, Segment Value, Highest Activity Over 12 Cycles, 12 individual columns with last 12 completed cycles from most recent to oldest for each account of account activity. The report is optimized for excel.

Report Name	Туре	Report Description
Accounts Renewing Within Three Months	Accounts	The Accounts Renewing within 3 Months report is used to help monitor card renewals by identifying accounts that will expire within 3 months of the report date with a status of "Active", "New", or "Suspended", including temporary suspension, and can be used to help monitor card renewals. Grand Totals provided for the report. The report lists: Hierarchy, Account Name, Account #, Account Status, Date Last Used, Last Used Amount, Current Balance, Expiration Date, and Status Reason.
Accounts Used with Single Amount Limit Greater Than \$2500	Accounts	This report displays a count of transactions and total transaction amount summary by account where the accounts single amount limit is greater than \$2,500. The report displays Hierarchy, Account Number, First Name, Last Name, Account Status, Credit Limit, Single Amount Limit, Count of Transactions, and Total Amount. This report is optimized for excel.
Available Limit by Low Available Balance	Accounts	The Available Limit by Low Available Balance report can be used to help monitor cardholders who are nearing their available limit and determine if their credit lines are sufficient. The report includes Account Name, Acct #, Current Balance, Date Balance was Effective, Credit Limit, Cash Limit, and Available Balance.
Cardholder Information	Accounts	The Cardholder Information report provides a listing of card accounts as well as the total number of cardholders. The report lists: Account Name, Account Number, Employee ID, Cardholder Address, Card Delivery, and Business Phone.
Cardholder Listing by Hierarchy	Accounts	The Cardholder Listing by Hierarchy report can be used to monitor the number and status of accounts in each Cost Center. The report lists: Hierarchy ID, Account Name, Account Number, Credit Limit, Cycle Amount Limit, Monthly Amount Limit, Other Amount Limit, Cash Advance Limit, Single Amount Limit, and Status.
MasterCard Enhanced Merchant Data	Merchant	MasterCard Enhanced Merchant Data. Contents of the report are best viewed in Excel format
MasterCard Socio Economic	Merchant	The Vendor Socio-Economic report provides the actual and percentage spend in dollars, transactions and number of vendors segmented by the various socio-economic statuses collected by MasterCard
MCC with Default Account Codes	Merchant	The Merchant Category Code with Default Account Codes report shows all default Merchant Category Codes and description. It includes individual Merchant Category Codes and shows default account codes where appropriate.

Report Name	Туре	Report Description
Merchant Profile with Custom Fields	Merchant	This report displays all merchants by Name, City, Street, ZIP, Merchant Category Code, Minority Code, Incorporated Status, Tax Payer ID, 1099 Indicator along with their classification labels, types, and values. These labels and types are values provided by the merchant in the transaction detail. Program Administrators can also designate custom fields according to the requirement of their procurement program.
Merchant Ranking	Merchant	This report ranks merchants in T&E categories in descending order of level of spend. The Merchant Ranking report identifies the Merchants where the accounts are used; the dollar amount spent per merchant, and can be used for negotiations. Subtotals are provided for each of the following Industries: Airlines, Car Rental, Lodging, Restaurants, and Transportation. The report is sorted by largest net dollar amount within each Industry, and lists the following information: Industry, Merchant Name, Net Dollar Amount, Number of Transactions, and Average Transaction Dollar Amount.
Parent Merchant Ranking	Merchant	The Parent Merchant Ranking report identifies the Parent Merchant where the accounts are being used, the dollar amount spent per parent merchant, and can be used for negotiations. Subtotals are provided for each of the following industries: Airlines, Car Rental, Lodging, Restaurants, and Transportation. The report is sorted by largest net dollar amount within each industry, and lists the following information: Industry, Parent Merchant, Net Dollar Amount, Number of Transactions, and Average Transaction Dollar Amount.
Summary Quarterly MCC	Merchant	The Summary Quarterly MCC report summarizes the total number of transactions, total dollar amounts, and average dollar amounts spent per quarter for each Merchant Category Code. The report lists: Quarter, MCC, MCC Description, Number of Transactions, Total Amount, and Average Amount.
Summary Quarterly Vendor Analysis	Merchant	The Summary Quarterly Vendor Analysis summarizes the total number of transactions and dollar amounts spent per Quarter with each Merchant. Subtotals are provided for each Merchant Category. The report lists: Quarter, MCC, MCC Description, Merchant Name and Address, # of Transactions, and Amount.
Summary Quarterly Vendor Analysis by Parent Merchant	Merchant	The Summary Quarterly Vendor Analysis summarizes the total number of transactions and dollar amounts spent per Quarter with each Parent Merchant. Subtotals are provided for each Merchant Category. The report lists: Quarter, MCC, MCC Description, Parent Merchant, # of Transactions, and Dollar Amount.

Report Name	Туре	Report Description
Account Activity With Hierarchies Report	Transaction	The Account Activity with Hierarchies Report shows transactional information for all transaction types with the information such as: Post Date, Transaction Date, Hierarchy ID, Hierarchy Description, Merchant Name, Merchant TIN Number, MCC, Transaction ID, and Transaction Type. The report shall be optimized for Excel.
Cash Advance Detail by Hierarchy	Transaction	Cash Advance Detail by Hierarchy report is used to analyze cash advance transactions from the cardholders. The report shows the hierarchy, account name, account number, transaction date, post date, parent merchant, merchant, merchant address, MCC/description, and amount of the cash withdrawal. If post date criterion is not selected, the report will report on the last 30 days of activity. The default sort order for the report is by hierarchy. This report is optimized for Excel.
Central Bill Reconciliation	Transaction	The Central Bill Reconciliation report can be used to analyze the transactions and accounts that have been charged to Central Bill accounts. Sub-totals are provided for each Central Bill account, as well as Grand Totals for the entire report. The report lists: Central Bill Account Number, Transaction Date, Post Date, Transaction ID, Merchant Name, MCC, Merchant City and Merchant State, Microreference, and Amount. Please note: Activity diverted to a diversion account is not listed on this report.
Central Bill Reconciliation Summary	Transaction	The Central Bill Reconciliation Summary report can be used to analyze the account activity for cardholders that are attached to a central bill account. Sub-totals are provided for each individual and/or central bill account that the transactions are billed to, as well as Grand Totals for the entire report. The report lists: Billed To Account, Diverted From Account Number & Name, Central Bill Account, Number of Transactions and Total Amount. Please note: Activity diverted to a diversion account is not listed on this report.
Credit and Debit	Transaction	The Credit and Debit report provides credits and debits correlated by account number, merchant name or MCC, exact dollar amount, and traveler name and ticket number, if available. The report includes Hierarchy ID (for all 10 levels), Lowest Level Hierarchy Description, Central Bill Account Number, Account Number, Account First Name, Account Last Name, Merchant Name, MCC, Ticket Number, Traveler Name, and debit and credit values for the following: Transaction ID, Transaction Date, Post Date, and Amount. The report is optimized for excel.

Report Name	Туре	Report Description
Declines	Transaction	The Declines report can be used to monitor the occurrences and reasons why cardholders have been declined. The report lists: Decline Code and Reason, Account Name, Account Number, Amount, MCC, MCC Description, Merchant Name, Merchant City, Merchant State/Province, Merchant Country, Date and Time of Decline.
Diversion Detail by Cardholder	Transaction	Diversion Details by Cardholder report can be used to analyze the charges to Diversion Accounts. Sub-totals are provided for each Diversion Account, as well as Grand Totals for the entire report. The report lists: Diversion Account #, Transaction Date, Post Date, Reference #, Merchant Name, MCC, Merchant City and State, Transaction Amount, Unit of Measure, Quantity, and Unit Price.
Foreign Currency	Transaction	The Foreign Currency report can be used to review transactions that occurred outside of the U.S. as well as the currency and exchange rate information. Subtotals are provided for each account, as well as Grand Totals for the entire report. The report lists: Account Name, Account #, Transaction Date, Post Date, MCC, Merchant Name and Country, U.S. Dollar Amount, Foreign Amount, Exchange Rate, and Currency Country.
Level III Temp Services Data	Transaction	This report can be used to analyze information from temporary services. Total transactions are provided for each supervisor as well as grand totals for the entire report. The report lists: Transaction ID, Transaction Date, Post Date, Merchant Name, City/State, and Amount. It also includes Source ID, Job Description, Temp Employee Name, Social Security Number, Requester, Job Code, Supervisor, Time Sheet Information such as Start Date, Week Ending, Hours, Overtime, Rate, Subtotal, Message ID, and Customer Code. Contents of the report are best viewed in Excel format.
Multiple Transactions- Single Merchant	Transaction	This report will display multiple transactions occurring at a single merchant on the same account. Multiple Transactions are defined as groups of transactions (at least 2) in which Transaction Dates are within a user defined time period and where the Transaction Merchant Name matches. The report displays information for hierarchy, account, transaction, merchant, and MCC.

Report Name	Туре	Report Description
OMB Purchase	Transaction	The Office of Management and Budget (OMB) Purchase Report is a quarterly run report that provides transactional data for OMB reporting. This report contains all columns required for OMB reporting. Based on information in PaymentNet, the following columns will contain information: Hierarchy, Number of Cards, Number of Active Accounts, Number of Net New Accounts, Charge Card Dollars Spent, Ratio of Approving Officials to Cardholders (Span of Control), and Average Number of Monthly Purchase Card Transactions Reviewed per Approving Official, Total Number of Convenience Checks Written, Number of Checks Written Over \$3,000, Number of Checks Written Equal To Or Under \$3,000, and Total Number of Individuals Authorized To Write Convenience Checks. Other columns required for OMB will be displayed on the report; however, these will need to be populated manually before sending to OMB. This report shall be defaulted to provide reporting on the root hierarchy level and the last quarter. This report is optimized for Excel.
Pending Review/Approve Report	Transaction	The Pending Review/Approval report details transactions and their review/approval status. The report displays hierarchy information, account information, merchant information, transaction detail information, approvers to which the transaction is assigned, and the dates assigned, reviewed, and approved by the approver. The report will display all types of transactions by default, but the report criteria can be set to display any combination of the following: new transactions, reviewed transactions, in-process transactions, stalled transactions, or approved transactions. The report is optimized for PDF format. Please note that the report defaults to 30 days of activity and the dates on the report may have a 24 hour lag in being available. The Date Assigned is not available for approved transactions.
Potential Forced Transactions	Transaction	The report displays potential forced transactions and the associated account and merchant information. The report displays Hierarchy, Transaction ID, Transaction Amount, Transaction Date, Post Date, Account Number, First Name, Last Name, Account Status, MCC, MCC Description, Merchant ID, Merchant Name, Merchant Address, Merchant City, Merchant State/ Province, Merchant ZIP. This report is optimized for Excel.

Report Name	Туре	Report Description
Potential Split Purchases	Transaction	The report will display transactions where the combined individual transaction amounts of split purchases with the same merchant potentially exceed either the single amount limit or the MCCG single amount limit. This report will also provide the account's MCC group and the associated MCCG single amount limit associated with the MCC of the transaction if it exceeds the single amount limit of the MCCG. Changes to the account or MCCG single amount limits and MCCs within MCCGs between the transaction date and the report run date will impact the data produced in the report. The report displays information for Hierarchy, Account, Transaction, Merchant, MCC, MCCG, Single Amount Limit, and Total Amount on Split Purchase.
Purchase Log	Transaction	The Purchase Log report shows a list of purchase log entries. The report lists Purchase Log Status, Account Number, Merchant, Purchase Log ID, Hierarchy ID, Purchase Date, Receipt Date, Requestor, Confirmed By, Total Cost, Estimated Freight, and Notes. Line item details and any matched transactions are also included.
Purchase Log Audit	Transaction	The report will provide all purchase log entry changes made over a selected date range. This report contains the purchase log ID, account number, change date and time, a description of the field changed, original data, new data and PaymentNet User ID that made the change.
Review and Approve Summary Statistics	Transaction	This report provides review and approve summary statistics by hierarchy and is configurable so that an A/OPC can view summaries at different hierarchy levels.
Statement of Account	Transaction	The Statement of Account provides a listing of previous 30 days of transaction information such as postdate, merchant, transaction amount, MCC, original amount and tax. The statement also contains, when available, accounting code allocations, transaction notes, custom fields (when applicable) and transaction addendum detail. Cardholder and Supervisor signature lines are also included at the bottom of the statement to assist in the review and reconciliation process. This statement is not an official bank billing statement and cannot be used for remittance. This report provides the default of the last 30 days unless overwritten by the user.
Statistical Summary Report	Transaction	The Statistical Summary Report lists account and transaction summary information with scope of view based on hierarchy. Hierarchies are displayed up to 10 levels deep, down to the level selected in the criteria. Account status information will be current up to 48 hour prior to the running of the report. The report can be run for a selectable date range and hierarchy level. By default, the report is sorted ascending by hierarchy. This report is optimized for excel.

Report Name	Туре	Report Description				
Transaction Audit	Transaction	The report will provide all transaction changes made over a selected date range. This report contains the transaction ID, change date, a description of the field changed, original data, new data and PaymentNet User ID that made the change.				
Transaction Detail	Transaction	The Transaction Detail report can be used to monitor the purchases for each account. Transactions as well as line items are included and payments are excluded from this report. Subtotals are provided for each account, as well as Grand Totals for the entire report. The report lists: Account Name, Account Number, Transaction ID, Transaction Date, Post Date, Purchase Method, Merchant Name, Merchant City and State, MCC, Debit Amount, Credit Amount, Tax and Transaction Type.				
Transaction Detail by Central Bill Account	Transaction	The Transaction Detail by Central Bill Account can be used to analyze the transactions and accounts that have been charged to Central Bill accounts. Sub-totals are provided for each Central Bill account, as well as Grand Totals for the entire report. The report lists: Tran Date, Post Date, Reference Number, Tran ID, Merchant Name, MCC, City, State, Amount, and Transaction Type.				
Transaction Detail By Hierarchy	Transaction	The Transaction Detail by Hierarchy report summarizes the number of transactions and total dollar amount for each account and Hierarchy level. Transactions as well as line items are included and payments are excluded from this report. Subtotals are provided for each Hierarchy, as well as Grand Totals for the entire report. The report lists: Transaction ID, Tran Date, Post Date, Purchase Method, Merchant, City, State, MCC, Debit Amount, Credit Amount,Tax and Transaction Type.				
Transaction Detail by Merchant	Transaction	The Transaction Detail by Merchant lists the transactions and dollar amounts spent with each Merchant. The report lists: Merchant Name, Merchant City, State, Zip, MCC, Transaction				
Transaction Detail by Parent Merchant	Transaction	The Transaction Detail by Parent Merchant report lists the transactions and dollar amounts spent with each Parent Merchant. The report lists: Parent Merchant Name, Merchant City, State, Zip, MCC, Transaction Amount, Reference #, Account Name, Transaction Date, and Post Date.				

Report Name	Туре	Report Description
Transaction Detail with Accounting Codes and Notes	Transaction	The Transaction Detail with Accounting Codes and Notes report shows a list of transactions with their account codes, notes and custom fields. Transactions as well as line items are included and payments are excluded from this report. The report lists Transaction ID, Cardholder Name, Account Number, Purchase Method, Merchant Name, Merchant City, State, MCC, Transaction and Post Dates, Transaction Amount, Transaction Type, Tax, Transaction Notes, an unlimited number of Account Codes, and Transaction Custom Fields. Contents of this report are best viewed in PDF format.
Transaction Detail with Level 3 Addendum	Transaction	The Transaction Detail with Level 3 Addendum Report lists transactions with enhanced addendum. Only Airline, Rental Car, Hotel, Travel, Fleet, Purchasing, and Shipping Addendum data is provided. If postdate criterion is not selected, the report will default to activity within the last 30 calendar days. This report is optimized for Excel.
Transaction Detail with Payments	Transaction	The Transaction Detail with Payments report can be used to monitor the purchases for each account. Transactions as well as line items and payments are included on this report. Subtotals are provided for each account, as well as Grand Totals for the entire report. The report lists: Account Name, Account Number, Transaction ID, Transaction Date, Purchase Method, Post Date, Merchant Name, Merchant City and State, MCC, Debit Amount, Credit Amount, Tax, and Transaction Type.
Transaction Detail with Purchase Addendum	Transaction	The Detail with Purchase Addendum report is used to analyze only transactions with purchasing addendum. The report groups the transactions by cardholder. It displays transaction date, postdate, merchant name, merchant city, merchant state, MCC, debit amount, credit amount, merchant sales tax and, if applicable, the level 3 data sent by the merchant such as item quantity, item description, unit cost, line item total, product code and unit of measure.
Transaction Disputes by Hierarchy	Transaction	The Transaction Disputes by Hierarchy report can be used to monitor the status of disputed transactions. The report lists: Account Name, Account #, Merchant Name, Transaction Date, Transaction Amount, Date Disputed, and Date Resolved.
Transaction Disputes by Status	Transaction	The Transaction Disputes by Status report lists the status of disputed transactions. The report lists: Account Name, Transaction ID, Account Number, Merchant Name, Transaction Date, Transaction Amount, Date Disputed, and Date Resolved.

Report Name	Туре	Report Description
Transaction Summary by Hierarchy	Transaction	The Transaction Summary by Hierarchy report summarizes the number of transactions and total dollar amount for each account by Hierarchy. The report lists: Account Name, Account Number, Number of Debit Transactions and Dollar Amount, Number of Credit Transactions and Dollar Amount, Total Number of Transactions and Dollar Amount. Contents of the report are best viewed in Excel and PDF format.
Transaction Summary by Merchant	Transaction	The Transaction Summary by Merchant summarizes the number of credit transactions and amount, the number of debit transactions and amount, total number of transactions, total amount per merchant. Contents of the report are best viewed in Excel and PDF format.
Transaction Summary by Parent Merchant	Transaction	The Transaction Summary by Parent Merchant summarizes the number of credit transactions and amount, the number of debit transactions and amount, total number of transactions, total amount per parent merchant. Contents of the report are best viewed in Excel and PDF format.
Transaction Summary by Post Date	Transaction	The report provides a summary of transaction amounts and number of transactions for each specified postdate, along with the total number, and associated percentage, of transactions that potentially exceed either the account single amount limit or MCCG single amount limit of an account for the specified postdate. The report displays Post Date, Amount, # of Trans, Potential # of Trans Over Single Amount Limit, and Potential % of Trans Over Single Amount Limit.
Transaction Summary by Transaction Date	Transaction	The report provides a summary of transaction amounts and number of transactions for each specified trans date, along with the total number, and associated percentage, of transactions that potentially exceed either the account single amount limit or MCCG single amount limit of an account for the specified trans date. The report displays Tran Date, Amount, # of Trans, Potential # of Trans Over Single Amount Limit, and Potential % of Trans Over Single Amount Limit.

# **APPENDIX H – PURCHASE CARD MONTHLY REPORT TEMPLATES**

The following elements shall be reported in the purchase card monthly reports \*Items in red are example reports

#### Single Purchase Limit Report:

Bureau	Cardholder Name	Single Purchase Limit	Card Status	FAC-C Certified	Warrant Issued (Yes/No)	Warrant Level	Reason	Corrective Action
NIST	Jane Doe	\$3,500	Active	No	No	N/A	FAC-C application pending review and	Reduce limit to \$3,000 until HCO
							approval	issues warrant.

### Convenience Check Report (a):

Bureau	Total Convenience Check Writers	Total Convenience Check Transactions	100% Monthly Convenience Check Review Complete? If "No" Indicate Anticipated Date for Completion	Total Number of Checks Written Over the Micro- Purchase Threshold	Number of Checks Written to Vendors That Accept the Purchase Card	Total Number of Checks Writers to DOC Check Writers, DOC Employees, or Other Individuals	Total Number of Checks Written to the Same Merchant the Same Day/Week Timeframe	Notes
ΙΤΑ	5	10	Yes	3	0	0	0	Reviewed check writer transaction files. Checks over the micro-purchase limit were made by warranted check writers. Purchase is authorized.

### **Convenience Check Report (b):**

Bureau	Check Writer Name	Check Number	Check Date	Check Amount	Transaction Detail	Issue	Corrective Action
Census	John Doe	0030	10/1/2014	\$3,000	Purchase from Costco	Purchased from a merchant who accepts credit cards.	Reviewed cardholder transaction files. Documentation includes merchant policy that it only accepts American express credit cards. Transaction "ok".

### Sales Tax Report:

Bureau	Cardholder Name	Vendor	Transaction Amount	Total Amount Sales Tax Paid	Reason Sales Tax Paid	Amount of Tax Recovered	Notes
NOAA	Jane Doe	John Smith Training Center	\$2,000	\$120	Vendor mistakenly added sales tax	\$120	Sales tax recovered. Cardholder retained documentation in transaction files.

## **Third-Party Vendor Transaction Report:**

Bureau	Cardholder Name	Vendor	Transaction Date	Transaction Amount	Did the Cardholder include documentation in their transaction file? for the reason used	Reason Third-Party Vendor Was Used
OS	John Doe	PayPal	10/1/2014	\$500	Yes	Merchant was the only vendor that carries the widget.

# Suspicious/Unusual Activity Report:

Bureau	Cardholder Name	Vendor	Transaction Date	Transaction Amount	Suspicious/Unusual Transaction Description	Notes
PTO	Jane Doe	Walmart	10/1/2014	\$500	MCC code indicates this transaction was made at a grocery location.	Vendor MCC code misleading. Cardholder documentation indicates transaction was made for office supplies.

## APPENDIX I – ENTRANCE AND EXIT CONFERENCE PURCHASE CARD MANAGEMENT REVIEWS

[INSERT LETTER HEAD]

MEMORANDUM FOR:

Program Manager

FROM:

Head of Contracting Office

SUBJECT:	Entrance and Exit Conference for Annual Purchase Card
	Reviews

The [*insert program office*] will be conducting a management review of purchase cardholders and convenience check writers in the various components of the [*insert program office name*]. Routine departmental reviews are conducted to minimize risk in exposing the agency to instances of fraud, waste, and abuse. These reviews will be conducted beginning on [*insert date*] and continue through [*insert date*].

Your office will be provided advance notice of the scheduled review. We will offer an entrance conference to discuss the review, a briefing of the conclusion and a copy of the final report of findings and recommendations. As appropriate, offices will be requested to develop a corrective action plan for any significant findings which will be implemented in [*insert FY*].

We recognize the value of efficiencies realized through the use of the purchase card. We believe that this review, in addition to identifying any areas of concern, will also enable the Department to identify common problems that can be rectified through additional information being made available to cardholders and will help to identify opportunities for strategic sourcing that will be available to all DOC offices.

It is requested that this memorandum be shared with the individuals within your organization who are either purchase cardholders or approving officials for cardholders. A list for your organization is attached.

# **APPENDIX J – PURCHASE CARD MANAGEMENT REVIEW CHECKLIST**

#### Purchase Card Quarterly Review Checklist

Cardholder Name:\_\_\_\_\_

Date of Review:\_\_\_\_\_

Period Covered: \_\_\_\_\_

[Insert Onsite or Electronic]

Reviewer Name: \_\_\_\_\_

No.	TRANSACTION REQUIREMENTS	Yes	No	N/A
1.	Purchase is for official government business?			
2.	Availability of funds is documented in the transaction file?			
3.	Required pre-approvals (approving official, budget officer, Head of Contracting Office, Office of General Counsel, where applicable) are obtained and documented in the transaction file?			
4.	Mandatory sources of supplies and services are documented in the transaction file?			
5.	Department strategic source initiatives have been utilized?			
5a.	Where departmental strategic source initiatives were not utilized, was there sufficient documentation that the mandatory sources of supplies and services were followed?			
6.	Price reasonableness is documented?			
7.	Purchase exceeds cardholder single purchase limit?			
8.	Purchase complies with requirements for Energy, Water Efficiency, and Renewable Energy?			
9.	Purchase complies with requirements for use of Recovered Materials and Bio- based Products?			
10.	Purchase complies with requirements for Contracting for Environmentally Preferable Products and Services?			
11.	Purchase complies with Section 508 requirements?			
12.	Purchase was made to a small business (if not, documentation is provided in the transaction file to support why a large business was selected)?			
13.	If purchase was made utilizing a third party vendor, is documentation provided to support why the vendor was used?			
14.	Purchase complies with established financial reconciliation schedule?			
15.	Purchase transaction file documentation complies with requirements set forth in CAM 1313.301, section 3.14.2?			
16.	Purchase complies with personal property reporting requirements (purchase was reported to the property custodian and bar-coded)?			

No.	TRANSACTION REQUIREMENTS	Yes	No	N/A
17.	If a convenience check was used to make the purchase, documentation is included in the transaction file to determine that the vendor does not accept purchase cards?			
18.	Is the purchase placed against an established contract?			
19.	The purchase is over the micro-purchase threshold and meets all of the requirements outlined in CAM 1313.301 and the FAR?			
20.	Does the Contracting Officer (cardholder) have a FAC-C Certification?			
21.	Does the cardholder possess an active Contracting Officer's Warrant?			
22.	If the cardholder has a single purchase limit above the micro-purchase threshold, does his/her Approving Official meet all of the Contracting Officer Warrant training requirements?			

NOTES/COMMENTS:

	Purchase Card Elements	No. of Records Reviewed	No. of Compliant Records	Accuracy Rate (No. compliant/No. Records Reviewed)	Account Name	Notes
	TRANSACTION					
1.	Purchases were for official Government business					
2.	Availability of funds was documented in the transaction file					
3.	Required pre-approvals (approving official, budget officer, Head of Contracting Office, Office of General Counsel, where applicable) were obtained and documented in the transaction file					
4.	Mandatory sources of supplies and services were documented in the transaction file					
5.	Department strategic source initiatives were utilized					
5a.	Where departmental strategic sources initiatives were not utilized, sufficient documentation was included in the transaction file that the mandatory sources of supplies and services were followed					
6.	Price reasonableness was documented					
7.	Purchases exceeded the cardholders single purchase limit.					
8.	Purchases complied with requirements for Energy, Water Efficiency, and Renewable Energy					
9.	Purchases complied with requirements for use of Recovered Materials and Bio-based Products					
10.	Purchases complied with requirements for Contracting for Environmentally Preferable Products					
11.	Purchases complied with Section 508 requirements.					
12.	Purchases were made to a small business (if not, documentation provided in the transaction file to support why a large business was selected)					
13.	Purchases made utilizing a third party vendor, documentation was provided to support why the vendor was used					
14.	Purchases complied with established financial reconciliation schedule					
15.	Transaction was appropriately reconciled (i.e. appropriate documentation obtained to support the purchase – receipts/invoices; cardholder and approving official certified within					

	established financial reconciliation process/schedule)			
-	Purchases complied with personal property reporting requirements			
16.	(purchase was reported to the property custodian and bar-coded)			
	If a convenience check was used to make purchases,			
17.	documentation is included in the transaction file to determine that			
	the vendor does not accept purchase cards			
18.	Purchases placed against an established contract.			
	Purchases over the micro-purchase threshold meet all of the			
19.	requirements outlined in CAM 1313.301 and FAR part 13			
20.	Contracting officer (cardholders) have a FAC-C certification			
	Contracting Officer (cardholder) possesses an active Contracting			
21.	Officers' warrant			
	Approving officials (managing cardholders with a single purchase			
22.	limit above the micro-purchase threshold) meet all of the			
	Contracting Officer Warrant training requirements			
	TOTAL RECORDS SAMPLED			
	TOTAL RECORDS SAMPLED			

## **APPENDIX L – PURCHASE CARD MANAGEMENT REVIEW REPORT**

### PURCHASE CARD MANAGEMENT REVIEW REPORT FOR

[Insert program office] Fiscal Year 20\_\_\_\_ Quarter \_\_\_\_\_

#### Introduction:

A Purchase Card Management Review was conducted at [insert field office] on [insert date(s)], by [insert name(s) of those performing review and the acquisition office]. The purchase card program at this location consists of [insert number of approving officials and number of cardholders]. [Insert the number of files reviewed] purchase cardholder files were reviewed. The purpose of this review was to evaluate the effectiveness and efficiency of the purchase card program and provide suggestions to improve any noted weaknesses or deficiencies. The review offers a baseline assessment of current strengths and weaknesses within the office.

#### **Certification Statement:**

The Purchase Card Management Review Summary, located in Appendix K (CAM 1313.301, [Date], was used as a guide and I [*insert name*], the Head of Contracting Office for the aforementioned program office certify that information contained in the summary and corresponding report is accurate and complete.

#### **Review Findings:**

- Attached is the completed Purchase Card Management Review Summary for [insert program office];
- The following areas were identified as strengths that enhanced internal controls and program oversight: [Insert items. Use additional pages as necessary to discuss strengths and best practices identified within the program review].
- The following areas were identified as weaknesses to internal controls governing the purchase card program: [Insert items. Use additional pages as necessary to discuss any weaknesses identified during the program review; and challenges/barriers faced in establishing effective controls in managing the program].
- Attached is the [insert field office] plan of action to address identified weaknesses and comply with these recommendations no later than [*insert date*].

**Required Signatures:** 

Head of Contracting Office Name (Printed)

Head of Contracting Office Name (Signature)

Date

## APPENDIX M – SAMPLE PURCHASE CARD PRE-PURCHASE CHECKLIST

Cardholder Name: \_\_\_\_\_

Office Name: \_\_\_\_\_

Date of Request: \_\_\_\_\_

Requestor's Name: \_\_\_\_\_

Requestor's Phone Number:

#### CHECKLIST

- 1. \_\_\_\_\_ This is a purchase for official Government business only
- 2. \_\_\_\_\_ This purchase is approved and authorized, in accordance with my organizational procedures and office budget coordinator, to ensure that funds are available for this purchase.
- 3. \_\_\_\_\_ The amount of this purchase is within my single purchase limit and is not a split or divided purchase.
- 4. \_\_\_\_\_ This purchase will not cause my 30-day limit to be exceeded.
- 5. \_\_\_\_\_ I have checked the mandatory sources of supplies and services as required by FAR Part 8 and Commerce Acquisition Manual (CAM) 1313.301, Section 3.4.
- 6. \_\_\_\_\_ The intended merchant is a small business, if not, explain:
- 7. \_\_\_\_\_ Purchases over the micro-purchase threshold: I have obtained price quotes from three different vendors.
- 8. \_\_\_\_\_ If the purchase is for an accountable asset or a sensitive item, it has been bar-coded and all purchasing information has been provided to the appropriate property custodian.
- 9. \_\_\_\_\_ If the purchase is for electronic or information technology (EIT) products, the items are compliant with appropriate Section 508 standards.
- 10. \_\_\_\_\_ If the purchase is for IT Desktop Hardware: I have followed the guidelines outlined in the OCIO "Guide to Acquiring IT Desktop Hardware".

Commerce Acquisition Manual	
1313.301	
	-

PURCHASE INFORMATION		
Item(s) to be Purchased: Description of Supplies or Services	Quantity (No of Units)	Cost (Units X Price)
ADDITIONAL INFORMATION RELATIVE TO THIS	S PURCHASE:	
Total Cost: \$		
FUNDING CLASSIFICATION		
Organization Code:		
Task Number:		
Object Class:		
Vendor Information		
Expected Vendor Name:		
Expected Vendor's Address:		
Expected Vendor's Phone#:		
Approvals		
Requestor's Signature:	Date:	
Cardholder Signature:	Date:	
Approving Official Signature:	Date:	
Budget Officer Signature	Date:	
HCO Signature (if applicable):	Date:	

# **APPENDIX N – SAMPLE PURCHASE CARD POST-PURCHASE CHECKLIST**

Cardholder Name:		
Approving Official Name:		
Office Name:		
Date of Request:		
Requestor's Name:		
Requestor's Phone Number:		
PURCHASE INFORMATION		
Item(s) to be Purchased: Description of Supplies or Services	Quantity (No of Units)	Cost (Units X Price)
Total Cost: \$		
FUNDING CLASSIFICATION		
Organization Code:		
Task Number:		
Object Class:		
VENDOR INFORMATION		
Vendor Name:		
Vendor's Address:		
Vendor's Phone#:		

#### CHECKLIST

- 1. \_\_\_\_\_ This purchase was for official Government business only.
- 2. \_\_\_\_\_ This purchase was approved and authorized, in accordance with my organizational procedures and office budget coordinator, to ensure that funds were available for this purchase.
- 3. \_\_\_\_\_ In reconciling this purchase, appropriate measures have been taken to ensure charges are applied to the correct accounting codes.
- 4. \_\_\_\_\_ I have received a receipt/invoice associated with this purchase.
- 5. \_\_\_\_\_ The amount of this purchase is within my single purchase limit and is not a split or divided purchase.
- 6. \_\_\_\_\_ This purchase will not cause my 30-day limit to be exceeded.
- 7. \_\_\_\_\_ If the purchase was incorrectly charged sales tax, appropriate measures have been taken to recover sales tax associated with this purchase.
- 8. \_\_\_\_\_ If the purchase is for an accountable asset or a sensitive item, it has been bar-coded and all purchasing information has been provided to the appropriate property custodian.
- 9. \_\_\_\_\_ An independent individual (not the cardholder) received and accepted the goods/services associated with this purchase.
  - a. If yes, please indicate name and email address of individual:
  - b. If no, please explain why an independent individual did not accept/receive the goods/services associated with this purchase:

#### **APPROVALS**

Cardholder Signature:	Date:		
Approving Official Signature:	Date:		

#### END OF DOCUMENT

#### END OF CAM 1313.301