



# **U. S. Department of Commerce Charge Card Management Plan**

# **Department of Commerce Charge Card Management Plan**

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# Department of Commerce Charge Card Management Plan

## 1. Introduction

As required by **OMB Circular A-123, Appendix B – A Risk Management Framework for Government Charge Card Programs**, this plan outlines the policies and procedures within the Department of Commerce (DOC) that are critical to the management of the charge card program, in order to ensure that a system of internal controls is followed and to mitigate the potential for fraud, misuse, abuse, and delinquency. This document is intended to be a living document and will be updated as changes occur within DOC's charge card program.

Over the past year, the Department transitioned to SmartPay3® with the servicing bank Citibank and Visa association for all commercial charge card services (purchase, travel, and fleet business lines). DOC's implementation of Citibank's CitiManager charge card management tool and Visa's Intillink data mining tool strengthens internal controls and facilitates transparency and accountability. These resulting solutions and business processes continue to enhance the Department's charge card programs and are reflected in this update to the DOC Charge Card Management Plan.

## 2. Personnel Management

### 2.1 Key management officials

*This section provides a list of the key card program management officials associated with the charge card program within the agency, along with their title and responsibilities. The key officials for each program are listed in the tables below.*

Charge Card Program

Name	Title	Responsibilities
Jean Mann	Task Order Contracting Officer	Contracting Officer for DOC SmartPay3 Task Order
Ebony Jackson Ondray James	Program Manager Purchase Card APC Level 1	Provides policy leadership in acquisition and procurement management.
Cecelia M. Kizer Byron Martin Rholondra Louis	DOC Travel Card Manager Travel Card APC Level 1 Travel Card APC Level 2	Travel card program
Darrell Stewart	DOC Fleet Card Manager Fleet Card APC Level 1	Provides fleet policy and overall fleet card guidance. Manages user access to online card systems.
Eston Lewis	Fleet Card APC Level 2	
Mike McConnell Tracey Cureaux Shannon Nelson Carla Robison Paula von Gemmingen	Director, NOAA Bankcard Center Purchase Card APC Level 2 Purchase Card APC Level 2 Purchase Card APC Level 2 Purchase Card APC Level 2	NOAA NOAA - AGO, HQ, EAD NOAA – AGO, WAD NOAA – AGO, CBC NOAA – AGO, CBC
Dawn Gresham	Purchase Card APC Level 2	OSEC, NTIS, NTIA, EDA, BIS, OIG, ITA, MBDA, NTIA, BEA
Lisa Wade	Purchase Card APC Level 2	USPTO
Samantha Brady, Ashley Oursler, Glenera Sisson, Eulene Daniels, Rhonda Droneburg	Purchase Card APC Level 2 Purchase Card APC Level 2 Purchase Card APC Level 2	Census Bureau NIST

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## **2.2 Process for appointing cardholders and Approving Officials (AOs)**

*This section outlines agency policies and procedures, by program, for appointing cardholders and Approving Officials (AOs).*

### **Purchase Card Program**

The Head of Contracting Office (HCO) has the overall responsibility for managing the purchase card program, including convenience checks, within an operating unit. The HCO approves the issuance of individual purchase cards and delegates management responsibilities in writing to the Agency Program Coordinators (APC), approving officials and cardholders.

Prospective purchase cardholders and approving offices must be nominated by an operating unit official and must complete the requisite training. Nomination packages are forwarded to the agency program coordinator and must include a written justification for issuance of the account along with applicable training certificates and proposed spending limits. Upon approval of nomination packages, Heads of Contracting Offices delegate authority to cardholders and approving officials by issuance of Delegation of Authority memoranda.

### **Travel Card Program**

The use of the Government Travel Charge Card (GTCC) is mandatory for all Departmental employees on official travel unless granted an exemption. The GTCC will be used by all non-exempt employees to pay for all costs related to official government travel. Official government travel is defined as travel under official authorizations/orders while performing duties pertaining to official government assignments such as temporary duty (TDY) and permanent change of station (PCS). The purpose of the GTCC is to serve as the primary method of payment for official travel expenses incurred by DOC employees and it also allows the cardholder access to the GSA City Pair Program. The use of the card for other than official travel is strictly forbidden.

Employees interested in applying for the Government Travel Charge Card will contact their servicing Bureau APC for the paper application or the online invitational passcode and email address. The Department recommends the use of the online travel application instead of the paper application for faster processing. Employees must complete and turn in a copy of the GSA Travel Cardholder training certificate and the Statement of Understanding (SOU) signed by the supervisor.

Once the APC is notified or in receipt of the application, the GSA travel training certificate, and the signed SOU, they will forward the request to the servicing bank who will perform a creditworthiness check before issuing the travel card.

Expedited applications processed online will require a signature for receipt of the travel card upon delivery, and the delivery address cannot be a P.O. Box. Expedited requests are for employees traveling within five to seven business days. When an expedited application is necessary, the applicant must notify his/her approving official/supervisor and the Bureau/Operating Unit APC.

### **Fleet Card Program**

GSA Leased Vehicles: DOC uses the GSA Fleet Card for leased vehicles. The local GSA Fleet Management Center (FMC) assigns vehicle specific cards to be used exclusively for the vehicle identified on the card. Purchases for maintenance and repair services are subject to a \$100 purchase limit, without prior approval from the GSA FMC. If repairs on a vehicle exceed \$100, the vendor must contact the GSA maintenance control center to authorization the repair. If a vehicle requires after-hours emergency repairs when the maintenance control center is closed, the GSA service provider (Wright Express) can authorize purchases up to \$500. In the event of an emergency that renders the vehicle unsafe to operate, the driver must call the GSA service provider to receive authorization for repairs up to \$500. The driver must call the maintenance control center during the next regular business day to report completed repairs.

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Agency Owned Vehicles: DOC Fleet Managers utilize Citbank/Visa and WEX charge card management tools and services for agency-owned and commercially-leased vehicles. Fleet cards are assigned to vehicles, not to individuals. The DOC Fleet Manager is responsible for card issuance, cancellation, and maintenance.

## **2.3 Procedures at employment termination or transfer**

*This section outlines the procedures taken by the agency when an employee terminates employment within the Federal government or transfers to a different agency or transfers within the same agency.*

### **Purchase Card Program**

When transferring between operating units within DOC or leaving the agency, the cardholder must notify his/her approving official and APC. When leaving, retiring, or transferring to another Government agency, the cardholder must return the card to his/her approving official along with any purchase card records. The approving official is responsible for determining when to close the account based on outstanding transactions and notifies his/her APC via email to close the account. The APC closes the account via the servicing bank's online system. The cancellation of the card is done immediately and the card is destroyed by the APC. The DOC employee exit clearance process includes the surrender and destruction of charge cards and convenience checks, therefore, failure to comply with these procedures may result in a delay of official employee checkout.

### **Travel Card Program**

The APC will verify if there are any outstanding balances based on the cardholder's previous statements. If the balance is zero, the APC will sign the clearance form. If the employee has an outstanding balance, the clearance form will not be approved, alerting the Human Resources office of an indebtedness. It is the cardholder's responsibility to pay all outstanding balances on his/her Government-issued Travel Card account. If the employee fails to pay the credit account, the servicing vendor or its collection agency may contact the holder and use lawful garnishment and salary offset remedies to attempt to satisfy the account, which may include reports to the credit bureaus.

### **Fleet Card Program**

There are no fleet card procedures for employee termination or transfer because fleet cards are assigned to the vehicle.

## **3. Training**

### **3.1 General**

*This section summarizes agency general training requirements that are relevant for all charge card program participants. Explain your agency's procedures for training.*

All charge card program participants receive training prior to appointment and/or issuance of a card and are required to take refresher training. Specific procedures for training are explained below.

### **3.2 Purchase Card Program**

Cardholders, approving officials, and agency program coordinators are required to certify that they have read and understand the policies and procedures outlined in Commerce Acquisition Manual 1313.301.

Cardholders, approving officials, and agency program coordinators shall document satisfactory completion of required training prior to nomination and appointment to the purchase card program.

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## **Basic Training Requirements for: Cardholders, Approving Officials, and Agency Program Coordinators**

All prospective cardholders, approving officials and agency program coordinators must document satisfactory completion of the following training:

- GSA SmartPay® Online Training
- FAC-047: Micro-Purchases and Section 508 Compliance
- Servicing Bank Cardholder Training
- Federal Strategic Sourcing Initiative for Office Supplies (FSSI OS4) Webinar
- DOC Customized Purchase Card Training

## **Additional Basic Training Requirements for Agency Program Coordinators:**

- Servicing Bank Electronic Access System Training
- Servicing Bank and Card Association Data Analytics Training

## **Additional Training Requirements for Single Purchase Limit above \$3,500**

Single purchase limits above the standard \$3,500 threshold is limited to warranted contracting officers. In addition to the basic training requirements, cardholders requesting single purchase limits above the \$3,500 threshold shall satisfy all contracting officer warrant requirements as outlined in Commerce Acquisition Manual 1301.6 and obtain a contracting officer's warrant issued by the Operating Unit Head of Contracting Office. Agency program coordinators and approving officials managing cardholder accounts with single purchase limits above the \$3,500 threshold shall meet all contracting officer training requirements outlined in CAM 1301.6 but are not required to obtain a contracting officer's warrant.

<b>Warrant Level</b>	<b>Warrant Threshold Authority</b>	<b>Education</b>	<b>Experience</b>	<b>Training</b>	<b>FAC-C Level</b>
<b>Level I</b>	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.	<b>Core Courses</b> <ul style="list-style-type: none"><li>• CON 100 or FCN 101</li><li>• CON 121</li><li>• CON 124</li><li>• CON 127</li><li>• FAC 023</li><li>• FAC 031</li><li>• CLC 057</li><li>• CLC 058</li><li>• CON 170</li><li>• Either CON 090 or FCN 190</li></ul> <b>80 CLPs every 2 years</b>	Level I

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<b>Level 2</b>	<p>In accordance with contract terms and conditions or a maximum of \$1,000,000.</p> <p>Up to the limits established in FAR 12.203 when using commercial item procedures.</p>	<p>4-year course of study leading to a bachelor's degree</p> <p style="text-align: center;"><b>OR</b></p> <p>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.</p>	<p>At least 2 years of contracting experience.</p>	<p><b>Core Courses</b></p> <p>All Level I Training</p> <ul style="list-style-type: none"> <li>• CON 200</li> <li>• CON 216</li> <li>• CLC 056</li> <li>• CON 270</li> <li>• CLC 051</li> <li>• HBS 428</li> <li>• CON 280</li> <li>• CON 290</li> </ul> <p><b>80 CLPs every 2 years</b></p>	Level II
<b>Level 3</b>	Unlimited	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.	At least 4 years of contracting experience.	<p><b>Core Courses</b></p> <p>All Level I and II Training</p> <ul style="list-style-type: none"> <li>• CON 360</li> <li>• Select 1 Harvard Business School module (other than HBS 428)</li> <li>• Choose one of the following:           <ul style="list-style-type: none"> <li>ACQ 265</li> <li>CON 244</li> <li>CON 252</li> <li>ACQ 315</li> <li>ACQ 370</li> <li>CON 370</li> </ul> </li> <li>• 32 hours of acquisition-related electives (may be 1 course or a series of courses but must be at least 8 hours in length).</li> </ul> <p><b>80 CLPs every 2 years</b></p>	Level III

### **Refresher Training**

Cardholders, approving officials, and agency program coordinators are required to complete DOC Customized Purchase Card Refresher Training annually, no later than July 31<sup>st</sup> each year.

Bureau Procurement Officials are required to certify in writing the status of refresher training for their purchase card program participants.

### **3.3 Travel card program**

#### **Cardholders**

All travel card applicants must complete the GSA online training for travel cardholders available at <https://training.smartpay.gsa.gov/training/travel-card-cardholders> and obtain a completion certificate. The certificate must be forwarded to the cardholder's APC. Refresher training is required every three years.

#### **Agency/Organization Program Coordinators (APCs)**

All APCs are required to complete the GSA online training course at <https://training.smartpay.gsa.gov/content/gsa-smartpay-travel-training-program-coordinators-apcs>. After completion, they must obtain a certificate and forward it to the bureau travel APC. Refresher training is required every three years.

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## **3.4 Fleet card program**

All vehicle operators are required to review "Driver Responsibilities" available at <http://www.gsa.gov/portal/content/191935> and Department of Commerce Property Management Manual (dated Dec 2017) Chapter 13, sec.13.9.

## **3.5 Record Keeping**

*This section summarizes agency procedures for documentation and record retention.*

### **Purchase Card Program**

As required by FAR 4.805, NARA Transmittal 23 and GSA Smart Bulletin #025, cardholders are required to keep copies of all documents pertaining to each purchase for a minimum of 6 years, including:

- Request for purchase with available funds, signed and dated by the requester;
- Required pre-approvals;
- Copy of online transaction, cash receipt, itemized receipt, or faxed verification of order;
- Delivery receipt or packing slip;
- Copy of appropriate Departmental property forms, if accountable property;
- Memorandum to the file to explain any unique circumstances for the transaction; and
- Independent receipt and acceptance or subsequent review of items obtained with the purchase card.

### **Travel Card Program**

The Department will utilize Citibank's CitiManager system as the electronic repository for travel applications and travel card transactions. APCs are required to maintain a record of the supervisors' approval for applications and credit increases.

### **Fleet Card Program**

Vehicle operators are required to keep copies of documents pertaining to fleet card transactions on file for a minimum of 6 years.

## **3.6 Ensuring effectiveness of training requirements**

*This section outlines agency procedures for ensuring that training policies and procedures remain current and effective.*

DOC purchase, travel, and fleet business lines require all program participants to utilize the GSA web-based online course for basic training, and all cardholders and approving officials must take refresher training. The purchase card program requires more extensive training as outlined above. Additional supplemental training may be required to update cardholders and approving officials on operating unit procedures, relevant regulatory changes and/or internal policies/procedures of the servicing acquisition office. Annual reviews are conducted to identify areas of weakness and training needs.

# **4. Risk Management**

## **4.1 Creditworthiness policies and procedures**

*This section summarizes agency policies and procedures regarding creditworthiness and performing credit checks.*

### **Travel Card Program**

Employees applying for the Government issued travel Card will undergo a creditworthiness check before issuance. All applicants receive either a standard or restricted card. If an employee's credit score is below the vendor's required threshold, the cardholder obtains a restricted card with a reduced spending limit with adjustments based on the operating unit's business needs and

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Departmental guidelines. If the Department receives an intra-government employee transfer, the employee will reapply for the travel card preempting a new creditworthiness check.

## **Fleet Card Program**

Creditworthiness policies are not applicable to the DOC Fleet Card Program. The cards are issued to the vehicle, not the employee.

## **4.2 Controls, practices, and procedures related to Centrally Billed Account (CBA) delinquencies**

*This section outlines agency risk management procedures in regard to CBA delinquencies.*

### **Purchase Card Program**

A Statement of Account is available to the individual cardholder from the servicing bank and lists all purchases made in the previous 30-day billing cycle. Cardholders and approving officials must ensure that statements are promptly reconciled. All statements must be reconciled no later than the 10<sup>th</sup> of each month. If a cardholder knows in advance that he/she will be absent and not available to reconcile the Statement of Account, the cardholder must forward all appropriate documentation (sales receipts, credit vouchers, etc.) to his/her approving official. The approving official will reconcile and approve the statement. Electronic reminders are sent to cardholders and approving officials each month. If the cardholder is not able to reconcile within the allotted time period, the approving official must ensure the reconciliation is completed in a timely manner. Reconciliation reports are available to approving officials in the servicing bank's system.

Cardholder accounts are monitored by APCs for repeated instances of delinquent reconciliations by cardholders and delinquent approvals by approving officials. Appropriate actions are taken (i.e., suspension/cancellation of authority) for repeated instances of delinquent reconciliations and/or approvals.

### **Travel Card Program**

A Statement of Centrally Billed Account is posted online in the servicing bank's electronic access system and available to the designated invoice processing personnel. A paper copy is also sent to the designated invoice processing personnel for the previous 30-day billing cycle.

CWTsatoTravel utilizes the Sabre Global Distribution System (GDS) for all reservation bookings. Any unused e-ticket drops to an unused e-ticket report database. CWTsatoTravel monitors the unused ticket report and automatically refunds any refundable unused ticket to the original form of payment, which in most cases should be the CBA. For non-refundable unused tickets, CWTsatoTravel will deploy the Document Bank tool, which works with the E2 tool. Document Bank/E2 will store all unused non-refundable tickets and alert travelers each time they book a reservation that they have unused tickets to use.

Concur uses Concur Compleat for preferred seating, booking reservations, managing airline schedule changes and much more. Concur Compleat integrates with SAP Concur Travel tools for a more integrated end-to-end solution.

### **Fleet Card Program**

The servicing bank alerts the DOC Fleet Manager with regards to delinquent fleet accounts. Individuals who misuse the fleet card, fail to reconcile fleet card transactions, or fail to perform their duties as the POC for fleet card transactions, may be subject to disciplinary actions in accordance with DAO 202-751.

GSA monitors fleet cards for fraud, waste, abuse, and misuse for GSA-leased vehicles. GSA will contact the Agency fleet manager in instances where fraud or misuse are discovered.

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## **4.3 Controls, practices, and procedures related to Individually Billed Account (IBA) delinquencies**

*This section outlines agency risk management procedures in regard to IBA delinquencies.*

### **Travel Card Program**

The servicing bank notifies the Department when cardholder accounts have become delinquent. As necessary, the Department APC notifies the operating units who have delinquent travel cardholders. In appropriate circumstances, the employee's supervisor may take disciplinary action in accordance with Department Administrative Order 202-751, entitled Discipline. The operating units' APCs also have access to the servicing bank's delinquency reports via the servicing bank's reporting system for cardholder account monitoring purposes.

## **4.4 Controls, practices, and procedures related to charge card misuse and abuse**

*This section outlines agency risk management procedures in regard to charge card misuse and abuse.*

All DOC employees are responsible for reporting cases of suspected fraud or misuse of the purchase card, travel card, fleet card, and/or convenience checks to the Office of Inspector General in accordance with Department Administrative Order 207-10 "Inspector General Investigation. Employees may report suspected fraud or misuse using the hotline complaint information in the table below:

<b>DOC Office of Inspector General Hotline Complaint Information</b>		
<b>Phone</b>	<b>Mail</b>	<b>Web</b>
Phone: 202-482-2495 Toll Free: 800-424-5197 Fax: 202-482-2803 TDD: 800-424-5197 TDD: 202-482-5923	OIG Complaint Intake Unit, Mail Stop 7089 1401 Constitution Ave., N.W. Washington, DC 20230	E-mail: <a href="mailto:hotline@oig.doc.gov">hotline@oig.doc.gov</a>  Online Hotline Complaint Form: <a href="https://www.oig.doc.gov/Pages/Hotline.aspx">https://www.oig.doc.gov/Pages/Hotline.aspx</a>

### **Purchase Card Program**

Specific risks associated with the DOC purchase card program include open Merchant Category Codes (MCCs). The missions of the Commerce operating units are varied; therefore, to mitigate potential risks, operating units establish restricted MCC groups based on specific mission need.

Examples of policies and procedures to mitigate risks include:

- Use of Intellilink (a comprehensive data mining tool) to monitor questionable MCCs.
- APCs review monthly MCC reports for the billing cycle transactions.
- APCs utilize the servicing bank's online system to review statements.
- APCs are required to perform monthly and quarterly reporting and quarterly management reviews of cardholders under their purview in order to evaluate the effectiveness and efficiency of the purchase card program's policy, procedures, and internal controls.

Violations of DOC purchase card policies and procedures may result in immediate cancellation of the card and disciplinary action against the cardholder and/or approving official. The range of disciplinary actions, which may vary with the severity of the infraction, are applied in accordance with DOC employee relations, legal, and management guidelines. Cardholders are subject to disciplinary action under applicable Department Administrative Order (DAO) 202-751, and

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Government-wide administrative procedures, including suspension and/or removal. Extreme cases may be prosecuted through the court system.

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 disciplinary and criminal actions. Supervisors use the table below as a guide for disciplinary measures, coordinating with the Office of Inspector General, Office of General Counsel, and Office of Human Resources Management, as appropriate.

## **Consequences for Purchase Card Misuse and Abuse**

<b>Consequences for Purchase Card Misuse and Abuse</b>	
<b>Infraction</b>	<b>Potential Consequences for Infraction</b>
<b>Fraud, Waste, and Abuse</b> Intentional use of the purchase card for unauthorized purchases or the approval of unauthorized transactions	<ul style="list-style-type: none"><li>• Card cancellation</li><li>• Termination of employment</li><li>• Fines and/or imprisonment</li><li>• Salary offset to collect full cost of unauthorized purchases including administrative expenses</li></ul>
<b>False Statements</b> False statements on purchase card records by cardholders and AO's	<ul style="list-style-type: none"><li>• Card cancellation</li><li>• Reprimand</li></ul>
<b>Personal Misuse</b> Unintentional use of the purchase card for unauthorized purchases	<ul style="list-style-type: none"><li>• Counseling</li><li>• Cardholder payment to DOC required to cover full cost of unauthorized purchases and possible administrative expenses</li></ul>
<b>Card Transfers</b> Transfer of purchase card to any person other than the cardholder	<ul style="list-style-type: none"><li>• Counseling</li><li>• Card suspension</li><li>• Card cancellation</li></ul>
<b>Failure to Maintain Card Security</b> Failure to safeguard physical location of the card and card account information	<ul style="list-style-type: none"><li>• Counseling</li><li>• Card suspension</li><li>• Card cancellation</li></ul>

## **Travel Card Program**

Bureau APCs will review the travel card activity report of all cardholder accounts monthly to identify potential areas of concern. If appropriate, APCs will notify the cardholder's supervisor of any questionable charges/transactions. If charges are identified as misuse/abuse or outside of Departmental policy, the employee's supervisor is authorized, in appropriate circumstances, to take disciplinary action in accordance with DAO 202-751.

<b>Consequences for Travel Card Misuse and Abuse</b>	
<b>Infraction</b>	<b>Potential Consequences for Infraction</b>
<b>Fraud, Waste, and Abuse</b> Intentional use of the travel card for unauthorized purchases or the approval of unauthorized transactions	<ul style="list-style-type: none"><li>• Card cancellation</li><li>• Termination of employment</li><li>• Fines and/or imprisonment</li><li>• Salary offset to collect full cost of unauthorized purchases including administrative expenses</li></ul>
<b>Personal Misuse</b>	<ul style="list-style-type: none"><li>• Counseling</li></ul>

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Consequences for Travel Card Misuse and Abuse	
Infraction	Potential Consequences for Infraction
Unintentional use of the travel card for unauthorized purchases	<ul style="list-style-type: none"><li>Cardholder payment to DOC required to cover full cost of unauthorized purchases and possible administrative expenses</li></ul>
<b>Failure to Maintain Card Security</b> Failure to safeguard physical location of the card and card account information	<ul style="list-style-type: none"><li>Counseling</li><li>Card suspension</li><li>Card cancellation</li></ul>

## Fleet Card Program

Government fleet cards are for official use only. Purchases of any unauthorized products or services are not permitted. The operating unit Fleet Manager will review fleet card monthly activity reports for cards assigned to vehicles under their purview. The operating unit Fleet Manager has the responsibility to identify potential areas of fraud, waste, and abuse.

Fleet Managers who suspect card misuse, fraud, or abuse must immediately notify their APC. Fleet card APCs are to take immediate action to ensure instances of suspected fraud and/or misuse are promptly reported to the OIG in accordance to DOC DAO 207-10 "Inspector General Investigation."

Additionally, APCs must notify the servicing bank, DOC Charge Card Program Manager, and share any information pertaining to the suspected misuse. The employee's supervisor is authorized to take disciplinary action in accordance with DAO 202-751, for instances of confirmed misuse and/or actions which violate Department policy.

## Consequences for Fleet Card Misuse and Abuse

Consequences for Fleet Card Misuse and Abuse	
Infraction	Potential Consequences for Infraction
<b>Fraud, Waste, and Abuse</b> Intentional use of the fleet card for unauthorized purchases or the approval of unauthorized transactions	<ul style="list-style-type: none"><li>Card cancellation</li><li>Termination of employment</li><li>Fines and/or imprisonment</li><li>Salary offset to collect full cost of unauthorized purchases including administrative expenses</li></ul>
<b>Personal Misuse</b> Unintentional use of the fleet card for unauthorized purchases	<ul style="list-style-type: none"><li>Counseling</li><li>Cardholder payment to DOC required to cover full cost of unauthorized purchases and possible administrative expenses</li></ul>
<b>Failure to Maintain Card Security</b> Failure to safeguard physical location of the card and card account information	<ul style="list-style-type: none"><li>Counseling</li><li>Card suspension</li><li>Card cancellation</li></ul>

## 4.5 Appropriate authorization controls establishment

The DOC charge card program includes a variety of internal controls designed to minimize card misuse. Merchant Category Code authorization groups, and single purchase limits, and monthly spending limits are assigned to each account. Purchases will be declined if the merchant category code is not authorized or the amount of the transaction exceeds the established limit controls. In addition, the Department's implementation of CitiManager's online reconciliation and approval process strengthens authorization controls.

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The Department also uses Visa's Intellilink tool, to monitor policy compliance, fraud detection, fraud prevention, and to identify card misuse and abuse. Intellilink monitors spending, merchant category codes, and split purchases; tracks and stores multiple investigations; provides status updates; and builds reports on the most common types of abuse and misuse.

## **4.6 Ensuring effectiveness of risk management controls**

*This section outlines agency procedures for ensuring that risk management policies and procedures remain current and effective.*

The Department uses the results of program reviews such as OIG audits, A-123 reviews, acquisition management reviews, monthly and quarterly reporting and quarterly management reviews to determine if internal controls are adequate, current and effective.

The DOC purchase card program includes a variety of management controls designed to minimize purchase card misuse. Key management controls include:

- Department-wide purchase card policies and procedures are developed and maintained.
- Mandatory training and documentation of successful completion for DOC purchase card program participants is required.
- Individual cardholder purchase limits, and documentation of cardholder limits and authorities are established through a written Delegation of Procurement Authority.
- Approving officials cannot be subordinate cardholders under their purview.
- Separation of duties is enforced.
- Pre-approvals, independent receipt and acceptance, and subsequent review of purchase card activities is required.
- Convenience checks require 100% review.
- Property obtained with a purchase card must be inventoried in DOC's property management system upon delivery, in accordance with DOC's property management policy.
- APCs are required to review purchase card data and reports from the bank to identify and investigate potential cases of fraud, waste, abuse, or misuse.
- Inactive purchase cards are reviewed every eighteen months.

## **5. Category Management and Strategic Sourcing**

*This section summarizes Department of Commerce practices related to strategic sourcing.*

The Department has focused on initiatives that drive savings and create operating efficiencies. Some of these initiatives include shutting down wireless zero usage lines, improving ground delivery shipping decisions, and consolidating common requirements across the Department, all of which have streamlined operations and generated significant savings. Targeted efforts have also included the creation of several strategically sourced contract vehicles, which are open to the entire Department. The purchase card is used as a method of payment for some of the agency's strategically sourced vehicles. In addition, cardholders are made aware of category management policies and encouraged to leverage category management solutions, when appropriate.

### **5.1 Ensuring effectiveness of strategic sourcing policies**

*This section outlines agency procedures for ensuring that strategic sourcing policies and procedures remain current and effective.*

Requirements and guidance for use of the Department's strategically sourced vehicles is included in Commerce Acquisition Manual 1313.301 (The Department of Commerce Purchase Card

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Program). Policy and guidance on the Department's strategic sourcing initiatives are routinely communicated to purchase card participants. Purchase card spending reports are reviewed to analyze spending patterns for strategically sourced vehicles. Compliance with strategic sourcing policies is also in purchase card program management reviews.

## **6. Refunds and Tax Recovery**

### **6.1 Refund management**

*This section outlines agency procedures to promote and ensure the effectiveness of refund management controls.*

Under SmartPay3, a composite refund which combines sales and productivity refunds together is used. The refund is accrued daily and remitted to the Department as specified in the task order. All monies above the charge card program expenses are returned to the operating unit.

Refunds are reviewed for accuracy and properly recorded as receipts. In addition, the Office of Acquisition Management performs an annual review of the charge card program to determine the effectiveness of refund management controls and looks for opportunities to expand the use of the card to increase refunds.

### **6.2 Tax recovery**

*This section outlines agency policies and procedures to promote and ensure the effectiveness of tax recovery.*

DOC cardholders are made aware, through training and policy, that transactions made with Government (i.e. centrally billed accounts) purchase, travel, and fleet cards are exempt from state and local sales tax for transactions made within the United States. Tax exemption information is available on the GSA internet site at <https://smartpay.gsa.gov/about-gsa-smartpay/tax-information/state-response-letter>

If the proposed tax is \$10.00 or less, cardholders are directed to ask if the merchant will grant a tax exemption without requiring a tax exemption certificate. Some States no longer allow tax exemption from State taxes and DOC complies with the Treasury Financial Handbook that permits a cardholder to make the purchase as long as the taxes do not exceed \$10.00.

DOC vehicles are assigned Citibank/Visa and WEX fleet cards, and the taxes are automatically taken off at the pump.

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## 7. Reporting

### 7.1 Reports

***This section outlines the various charge card reports that Department of Commerce utilizes for monitoring delinquency, misuse, performance metrics, and other transactions and program management issues.***

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Examples of standard reports that DOC receives, as well as custom and ad hoc reports are as follows:

<b>Report Name</b>	<b>Type</b>	<b>Description Of Reports</b>
45-Day	Accounts	The 45-Day report can be used to monitor delinquencies as it identifies accounts that are between 30 and 60 days past due.
Cardholder with Account and MCC Group Limits	Accounts	The Cardholder with Account and MCC Group Limits report can be used to identify account and Merchant Category Code group authorization limits.
Centrally Billed Reconciliation	Transaction	The Central Bill Reconciliation report can be used to analyze the transactions and accounts that have been charged to Central Bill accounts. The report lists: Central Bill Account Number, Transaction Date, Post Date, Transaction ID, Merchant Name, MCC, Merchant City and Merchant State, Micro-reference, and Amount.
<u>Centrally Billed Reconciliation Summary</u>	Transaction	The Centrally Billed Reconciliation Summary report can be used to analyze the account activity for cardholders that are attached to a centrally billed account.
<u>Charge Off</u>	Accounts	The Charge Off report can be used to monitor bad debts. The report lists: Account Name, Account Number, Charge Off Amount, Charge Off Date, Past Due Amount, and Balance.
<u>Delinquencies with Current Balance</u>	Accounts	The Delinquencies with Current Balance report can be used to monitor past due accounts per cardholder. Subtotals are provided for each hierarchy level, as well as grand totals for the entire report. The report lists: Hierarchy, Account Number, Account Name, Past Due Amounts in each of the following categories: 1-30 Day, 31-60 Day, 61-90 Day, 91-120 Day, 121-150 Day, 151-180 Day, Charge-off Amount, and Current Balance.
<u>MCC with Default Account Codes</u>	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.
<u>Summary MCC</u>	Merchant	The Summary MCC report summarizes the total number of transactions, total dollar amounts, and average dollar amounts spent for each Merchant Category Code.
<u>Spending Analysis by Tax ID</u>	Merchant	The Spending Analysis by Tax ID report can be used to analyze the purchases within the following merchant classifications: Sole proprietorship, Partnership, and Unincorporated. Sub-totals for service related and non-service related industries are provided within each merchant classification.

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## Travel Card Program

Report Name	Type	Description Of Reports
<u>Declines</u>	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.
<u>Delinquencies with Current Balance</u>	Accounts	The Delinquencies with Current Balance report can be used to monitor past due accounts per cardholder. Subtotals are provided for each hierarchy level, as well as grand totals for the entire report. The report lists: Hierarchy, Account Number, Account Name, Past Due Amounts in each of the following categories: 1-30 Day, 31-60 Day, 61-90 Day, 91-120 Day, 121-150 Day, 151-180 Day, Charge-off Amount, and Current Balance.
<u>Delinquency Summary</u>	Accounts	The Delinquency Summary report tracks past due balances, write-offs, recoveries, outstanding, and current balances by hierarchy for an Organization. It includes the Hierarchy levels, descriptions, number of accounts and amounts written-off, recovered amounts, outstanding and current balances, and buckets for accounts that are 1-30, 31-60, 61-90, 91-120, 121-150, 151-180, or 181-210 days past due. When running the report, choose a hierarchy and whether to include its children as well as a hierarchy roll-up level, or range of levels, to be displayed on the report.
<u>Unusual Activity Analysis</u>	Administration	The Unusual Activity Analysis can be used to monitor unusual transaction activity and determine if the transactions are business-related. Subtotals are provided for each Merchant Category, as well as Grand Totals for the entire report. The report lists: MCC, MCC Description, Account Name, Merchant Name, City, State, Transactions Date, and Transaction Amount.

## Fleet Card Program

Report Name	Type	Description Of Reports
<u>Fuel Purchase Detail Summary</u>	Transaction	The Fuel Purchase Detail Summary can be used to evaluate fuel purchases. The report lists: Account Name, Transaction Date, Merchant Name, Merchant Location, Purchase Amount, Purchase Time, Quantity, Item, Price, and Tax.
<u>Centrally Billed Reconciliation</u>	Transaction	The Centrally Billed Reconciliation report can be used to analyze the transactions and accounts that have been charged to Centrally Billed accounts. Sub-totals are provided for each Centrally Billed 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, Micro-reference, and Amount. Please note: Activity diverted to a diversion account is not listed on this report.
<u>Centrally Billed Reconciliation Summary</u>	Transaction	The Centrally Billed 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, Centrally Billed Account, Number of Transactions and Total Amount. Please note: Activity diverted to a diversion account is not listed on this report.

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Report Name	Type	Description Of Reports
<u>Fleet Transaction Detail</u>	Transaction	The Fleet Transaction Detail Report is used to monitor fuel and non-fuel related purchases for each account.
<u>Declines</u>	Transaction	The Declines report is used to monitor the occurrences and reasons why transactions have been declined. This report includes 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.

## **8. Section 508 of the Rehabilitation Act**

### **8.1 Section 508 Compliance**

*This section summarizes agency practices related to ensuring that products procured comply with Section 508 of the Rehabilitation Act.*

All DOC purchase cardholders and approving officials are required to complete Section 508 training. In addition, a Section 508 compliance checklist must be completed for each purchase and documented in the purchase card transaction file.

## **9. Environmental Requirements**

### **9.1 Environmental quality of products procured with purchase cards**

*This section summarizes agency practices related to the environmental quality of products procured with purchase cards.*

Cardholders are required to purchase green products and services to the maximum extent practicable, consistent with the requirements of Federal Acquisition Regulation Part 23 and Commerce Acquisition Manual 1323.70 and Federal green procurement preference programs.