



DEPARTMENT OF THE NAVY
COMMANDER TRAINING AIR WING SIX
390 SAN CARLOS ROAD SUITE C
PENSACOLA, FLORIDA 32508-5509

COMTRAWINGSIXINST 4200.1H
N18
19 May 16

COMTRAWINGSIX INSTRUCTION 4200.1H

From: Commander, Training Air Wing SIX

Subj: GOVERNMENT COMMERCIAL PURCHASE CARD (GCPC) PROGRAM

Ref: (a) NAVSUPINST 4200.99C
(b) General Services Administration (GSA) Contract GS23F98006
(c) Federal Acquisition Regulation (FAR)
(d) Defense Federal Acquisition Regulation Supplement (DFARS)
(e) COMTRAWINGSIXINST 7332.2 (Series)

Encl: (1) GCPC Program Guidance
(2) GCPC Flowchart
(3) Sample Schedule of Potential GCPC Offenses and Remedies to Civilian Personnel
(4) Requisition Form
(5) Purchase Card Log

1. Purpose. Establish policy, procedures, and responsibilities per Department of the Navy (DON) guidance regarding Commander, Training Air Wing SIX (CTW-6) use of the GCPC as a method of procurement for purchases at or below \$3,500 and method of payment for procurements exceeding the micro-purchase threshold at or below \$25,000.

2. Cancellation. COMTRAWINGSIXINST 4200.1G

3. Background. The DON eBusiness Office has responsibility for GCPC program policy. All DON activities using the program must comply with the provisions of reference (a). The GSA Federal Supply Services (FSS) awarded reference (b) to CITIBANK for GCPC services. The contract provides, at the request of federal ordering agencies, GCPCs and associated services for civilian and military government employees to make purchases for official government use. References (c) (Part 13) and (d) (Part 213) provide federal guidance for all purchases to be accomplished with the GCPC.

4. Policy. The intent of this instruction is not to modify, delete, or in any way relieve an activity or individual from the responsibility to comply with all applicable acquisition regulations, directives, procedures, and instructions. CTW-6 policy is to use the GCPC for all supplies and services at or below the micro-purchase threshold as a procurement method and, where practical and permissible, as a method of payment for contracts. These internal operating procedures, enclosure (1), provide guidance on the appropriate use of the GCPC program.

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5. Action. The GCPC Approving Official (AO) will approve all single items requested under \$500. All single item requests in excess of \$500 will be review by the Chief Staff Officer (CSO) prior to the GCPC AO approval.



EDWARD L. HEFLIN

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GOVERNMENT COMMERCIAL PURCHASE CARD PROGRAM GUIDANCE

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GOVERNMENT COMMERCIAL PURCHASE CARD PROGRAM GUIDANCE

1. Introduction

a. The GSA FSS awarded contract GS23F08006 for government-wide commercial credit card services to CITIBANK. The contract provides, at the request of federal ordering agencies, GCPCs and associated services for civilian and military government employees to make purchases for official government use. These internal operating procedures provide guidance on the appropriate use of the program by CTW-6 personnel. Enclosure (2) provides a flowchart of the CTW-6 GCPC program process.

b. The GCPC is authorized for making and/or paying for micro-purchases of supplies not to exceed \$3,500, services not to exceed \$2,500, and construction not to exceed \$2,000. The GCPC is also authorized for making contract payments when a contractor agrees to accept payment by the card. Policy for using the GCPC as a method of payment for a task or delivery order over the micro purchase threshold is governed by NAVSUPINST 4200.85 (Series)

2. CITIBANK Purchase Card. CITIBANK is the contractor who will maintain all purchase card accounts, issue cards to CHs, send monthly statements to CHs and AOs, and provide various reports to the APC.

3. Definitions

a. Billing Cycle. A 30-day billing period when the purchase CHs may use their purchase card. The billing cycle activity ends on the 19th of each month.

b. Billing Cycle Purchase Limit. The spending limit assigned to each purchase CH's cumulative purchase and transactions within a given billing cycle.

c. Billing Cycle Office Limit. The monthly office limit is a budgetary limit established by the APC for each AO. The limit established by the APC will not exceed the sum of the CH's monthly purchase limits and should reflect spending history as well as budgetary trends.

d. Purchase CH. Any government employee who is designated by the HA or designee to be issued a purchase card or purchase card account. The purchase card bears the name/account number of purchase CH.

e. Commonly Used Hazardous Material (HAZMAT). For the purpose of this instruction, commonly used HAZMAT means HAZMAT or products that are customarily sold to the general public to be used for non-governmental purposes (commercial products) that are in the same size and packaging found commercially.

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- f. Contracting Officer. Government employees who have the authority to bind the government to the extent of their delegated purchasing authority.
- g. Credit Limit. The maximum dollar threshold assigned at the AO/billing level limiting the amount an account can have outstanding at any one time.
- h. Disputes. Instances where the transactions on the purchase CH's statements do not agree with retained receipts or entries in the log.
- i. Purchase Card. A credit-card-like purchase account established with the bank that enables properly authorized government personnel to buy and pay for mission requirements.
- j. Purchase Card Log. Manual or automated log on which the purchase CH documents screening for mandatory government sources and individual transactions using the purchase card. Entries in the purchase card log should be supported by internal command documentation (enclosure (3)).
- k. Monthly Purchase CH's Statement. The statement of charges forwarded to the purchase CH at the end of the billing cycle detailing all of the charges during that period.
- l. Monthly Billing Statement. An official invoice identifying all of the transactions of the purchase CH during a billing cycle that is used for the purpose of payment. This invoice is provided to the AO.
- m. Reconciliation. The process by which the purchase CH and AO review their monthly statements and reconcile against available vendor receipts and purchase card log.
- n. Services. For the purposes of this instruction, services are firm fixed priced (including unpriced orders with an established ceiling), nonpersonal, commercially available requirements in which we directly engage the time and effort of the contractor to perform a task (e.g., repairs, maintenance, annual maintenance agreements, etc.).
- o. Single Purchase Limit. The dollar threshold assigned to each purchase CH for a single purchase/payment action.
- p. Transaction Type. The method by which an order is placed upon using the purchase card. Purchase card buys may be made over-the-counter, over-the-phone, or via the Internet.

4. Delegations of Authority

- a. Head of Activity (HA). The HA ensures that appropriate administrative and disciplinary action is taken when fraudulent, improper, and/or abusive purchase card transactions are found. The HA ensures that all program participants have received the required training per DOD and

DON policy and procedures. The HA must be cognizant of the guidelines outlined in the purchase card desk guide entitled “Commanding Officer’s Top 10 Purchase Card Management Tips.” The HA desk guide is available on the DON Consolidated Card Program Management Division (CCPMD) web site, <https://www.navsup.navy.mil/ccpmd>. The HA has delegated authority to the APC to appoint GCPC program personnel.

b. Agency Program Coordinator (APC). The APC will be designated in writing by the HA and is the individual responsible for day-to-day program oversight. The APC serves as the liaison between CTW-6 Claimant APC, CITIBANK, and the GSA Contracting Officer. The APC oversees and establishes guidelines for the CITIBANK purchase card program. The APC must submit changes to dollar limitations or authorized merchant codes to CITIBANK. The APC also coordinates card applications, issuance and destruction of cards, reports, and administrative training. The APC must review the DON eBusiness APC desk guide and follow the guidance provided therein. The APC desk guide, appointment templates and forms are available from the DON CCPMD web site, <https://www.navsup.navy.mil/ccpmd>. The Wing Financial Management Analyst (N181), 452-2876, will perform the CTW-6 APC function.

c. Approving Official (AO). An individual designated in writing who is responsible for ensuring proper use of the purchase card through approval of purchases for the CHs within their purview. The AO will review the CH's monthly statement of account to ensure purchases are made per the FAR and agency regulations. The AO will enforce the provisions of these internal procedures and initiate administrative and disciplinary procedures for misuse of the card per these procedures. CTW-6 AOs will be designated by the Wing APC and acknowledge the responsibility and the understanding of reference (a) and the CITIBANK regulations. AOs must review the DON CCPMD AO desk guide and follow the guidance provided therein. The desk guide, appointment templates and forms are available from the DON CCPMD web site, <https://www.navsup.navy.mil/ccpmd>.

d. CH (CH). The CH is the individual to whom a purchase card is issued in order to buy supplies and services. Prior to making purchases, the CH must receive a delegation of authority from the Wing APC and acknowledge the responsibility and the understanding of reference (a), CITIBANK regulations, and the policy specified within this instruction. The card bears the CH's name and will only be used by this individual to pay for authorized U.S. Government purchases. This delegation will specify the single purchase limit, the billing cycle purchase limit, and the transaction types authorized (over-the-counter, over-the-telephone, and/or via the Internet). CHs must review the DON CCPMD CH desk guide and follow the guidance provided therein. The desk guide, appointment templates and forms are available from the DON CCPMD web site, <https://www.navsup.navy.mil/ccpmd>.

e. Financial Manager (FM). An individual that liaisons with the APC to ensure CHs are assigned the correct lines of accounting and funds are committed to satisfy the requirement. The FM ensures all exception output from STARS-FL INFOPAC files is corrected and the APC is informed of any corrections required to the CitiDirect web site.

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5. Training

a. Prior to designation as a program participant via a letter of delegation, all prospective APCs, AOs and CHs shall successfully complete mandatory training per reference (a), Chapter 3, paragraph 5.

b. Refresher training. All APCs, AOs, and CHs shall complete purchase card refresher training via the CCPMD GCPC website within two years of completing initial training.

c. Annual Training.

(1) All APCs, AOs and CHs are required to complete annual ethic training.

(2) All AOs and CHs are required to complete Certifying Officer Legislation Training.

(3) At the beginning of each fiscal year, the APC will conduct IOP training for all program participants and as needed when Purchase Card Administrative Notices are issued.

d. Documentation of training for all participants must be maintained by the APC for the duration the participant/employee serves in this capacity and for three years beyond.

e. All personnel shall review and retain the DON purchase card program desk guide applicable to the function they have been designated to perform. Desk guides are available from the DON CCPMD web site, <https://www.navsup.navy.mil/ccpmd>.

6. Dollar Limits Associated with the Card. Use of the purchase card by a CH at CTW-6 is subject to a single purchase limit, a monthly CH limit, and a monthly office limit. These limits are established in each CH delegation of authority letter. The single purchase limit cannot be exceeded unless a revised delegation of authority is issued by the APC raising the limit.

7. Vendor Authorization. When issuing this card to an employee, authorization codes will be established by the APC and in concurrence with the CH's AO. These authorizations will be incorporated in the card and are referred to as merchant category codes. Under normal circumstances, merchants are required to obtain authorization from CITIBANK for purchases over \$50. However, many merchants now use electronic authorization methods allowing them to obtain authorization for all purchases, regardless of amount. When authorization is sought for a purchase by the merchant, the CITIBANK authorization system will check each individual CH's single purchase limit, the billing cycle purchase limit, the AO's billing cycle office limit, transaction method, and the type of merchant where the CH is making a purchase before authorization for that transaction will be granted.

8. Card Security

a. The unique CITIBANK Visa that the CH receives has his/her name embossed on it and may be used only by that person. The card was specially designed showing the great seal of the United States and the words "United States of America – Smart Pay" imprinted on it to avoid being mistaken for a personal credit card.

b. It is the CH's responsibility to safeguard the purchase card and account number at all times. The CH shall not allow anyone to use his/her card or account number. A CH who permits his/her GCPC or GCPC account number to be used by another person shall have his/her card withdrawn and shall be subject to disciplinary action, up to and including removal, as well as to criminal prosecution under Title 18, United States Code, or the Uniform Code of Military Justice for military personnel.

c. Credit cards will be kept under lock and key when not in use. Credit cards should not be kept in purse or wallets. This action will assist in assuring the GCPC is not accidentally used for personal transactions.

9. Improper, Fraudulent, Abusive, Negligent, or Unauthorized Use of a Purchase Card.

Improper, fraudulent, abusive, negligent, or unauthorized use of a government charge card is prohibited. Unauthorized use means the use of a purchase card by any person other than the CH whose name appears on the purchase card. Use of the card for purposes that are not official Wing business is in violation of regulation or law. Unauthorized use also means use of a purchase card by a contracting officer who exceeds his/her delegation of authority. Supervisors who receive information indicating that a CH has engaged in any misuse of a government charge card shall take appropriate action, including an investigation. The circumstances of each individual case will determine the appropriate type of corrective or disciplinary/adverse action, if any, that may be imposed. Reference (a) provides guidance applicable to civilian employees, and enclosure (3) provides examples for penalties for such offenses. The AO and/or CH shall be subject to administrative disciplinary action, prosecution under the Uniform Code of Military Justice, and/or criminal prosecution under Title 18 of the United States Code for improper, fraudulent, abusive, negligent, or unauthorized use.

10. Prohibited Purchasing Actions. Purchase actions prohibited by DON purchase card policy are identified in reference (a), Chapter 4, Paragraph 5.

11. Prohibited Purchases. Purchases prohibited by DON purchase card policy are listed in reference (a), Chapter 4, Paragraph 6.

12. Conferences. Departments desiring to sponsor a conference will obtain approval from the CSO, provide a copy of the approval request to N181, and provide a copy of the final bill to N181 upon completion of the conference.

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13. Training Requests (SF Form 182)

a. All training costs at or below \$25,000 when the training is an off-the-shelf event, conference, or instructional service available to the general public will be made with the GCPC.

b. Each individual will prepare an SF Form 182. Block 27 will state that "Payment will be made with the GCPC." Also, annotate CH's name and telephone number. Contact 452-2272, for CH information.

c. A copy of the SF Form 182 must be provided to the CH prior to forwarding it to the Management Services Officer (00B).

14. Micro-Purchase Procedures When Using the Card

a. Prior to making a purchase, the CH must receive a written request for supplies/services (requirement). Utilizing reference (e), identify whether the material needs to be recorded in a formal property management or accounting system. If so, forward the requirement to the Wing CH, for procurement and cataloging into the appropriate property management system.

b. The next step in the process is to complete enclosure (4), and then screen requirements for their availability from mandatory government sources of supply. Use of the GCPC must comply with DON Directed Procurement Policy per reference (a), Chapter 4, paragraph 3c

NOTE: If the requirement is not available from mandatory sources, documented proof of screening is required to justify the transaction from a commercial source.

c. If the requirement is not available from mandatory sources, the CH will solicit three quotations and document the merchant's quote on the record of purchase form, enclosure (4).

The AO approval is required prior to making a purchase from a commercial source.

d. Once a source of supply is identified for the requirement, the CH must verify that sufficient funds are available to pay for the purchase.

e. The CH will then forward enclosure (4) to the AO for approval.

f. Once enclosure (4) is approved and returned from the AO, the CH may proceed to purchase the supplies/services. This may be accomplished:

(1) Over-the-Counter. The CH goes to the merchant's place of business to make the purchase and the supplies are immediately available.

(2) Over-the-Phone. Orders are placed by phone and the contractor delivers the supplies to the activity or government pickup is authorized.

(3) Via the Internet. When purchasing/ordering via the Internet, all CHs will ensure that appropriate account safeguarding measures are taken. All purchases/orders will be approved by the CH's AO. The AO has the authority to pre-approve reoccurring requests to prevent procurement delays.

g. CHS should not make purchases from merchants that use a third party payment vendor; i.e. PayPal, unless no other merchant is available.

h. The CH shall obtain documentation from the merchant showing the item(s) purchased, the unit price, the total amount, date of the transaction, shipping/handling, and tax (as applicable) .

i. Whether the purchase is made over-the-counter, over-the-phone, or via the Internet, the following applies:

(1) The CH cannot requisition supplies if they are procuring the material. In addition, they cannot receive, inspect, or accept the material. Some other person must accomplish these functions. This person is required to be a Government employee and must sign and print name on invoice. There must be a separation of function between requisitioning, procuring, and receiving. A single individual may perform only one of the following functions:

- (a) Initiation of the requirement.
- (b) Award of contract or placement of order.
- (c) Receipt, inspection and acceptance of supplies or services.

(2) Merchants should be reminded not to charge sales tax unless the location of the merchant's business is in a state that does not afford the Federal Government a tax-exempt status under its state and local laws (i.e., Arizona, Hawaii).

(3) Certify that the quality and quantity of the items furnished are per this agreement (verbal or written) with the vendor.

j. A purchase card log will be used to record all purchase card transactions. The purchase card documentation should provide an audit trail supporting the decision to use the card and any required special approvals that were obtained. Enclosure (4) provides the required format for annotation of procurement information. The documentation should be held until the monthly billing statement is received and then attached to the statement when it is submitted to the AO. Specific guidance on the proper use of the log is as follows:

(1) Purchase number – Four digit Julian date and last four numbers of transaction/invoice number. For example: 6026-3609.

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(2) Date of purchase – Self explanatory

(3) Requestors name – Will be the same person listed as the initiator on enclosure (4) and must be a person's name.

(4) Description – Self explanatory

(5) Merchant Name – Self explanatory

(6) Purchase amount – Enter amount of purchase as a **negative** number.

(7) Funding Type – Ensure proper type is entered. Funding types can be found on the balance sheet.

(8) Date Received – Self explanatory

(9) Received by – Will be the same person as the receiver on enclosure (4).

(10) Billing Period – Will be listed by billing cycle. For example: 20 Jan -19 Feb 2016.

(11) Paid by not Received - List the items paid for by name that have not been received

(12) Disputed – If column “K” was used then this column should indicate “No”. If the item listed in column “K” is not received by the next billing cycle then this column will indicate “Yes” and will remain “Yes” until dispute is resolved.

(13) Credit Received – Will indicate any credits received from the transaction and will be listed as a **positive** number.

15. Documentation. Anytime a transaction is made using a card, whether it is done over-the-counter, via telephone, or over the Internet, the following documentation is required:

- a. Requisition form, enclosure (4).
- b. Signed sales receipt - ensure legible signature (shows receipt/acceptance; what was purchased).
- c. Proof of Delivery/Acceptance
- d. Purchase Log entry.
- e. Any additional documentation to support the legality of the purchase.

16. Invoicing Procedures. All credit card statements must be reconciled and electronically certified within five working days when the invoice status changes from “INTERIM” to “NEW” on the CitiDirect web site. The status usually changes within two to three days of when the billing cycle ends. If not, notify the APC.

17. Reconciliation

a. CH. At the end of each monthly billing cycle, the CH will check each transaction on their statement to verify the accuracy. Pay and confirm procedures are used in instances where CHs have been billed and have not received the items ordered. The CH shall confirm with the vendor that the items ordered are in transit and reconcile the monthly statement in full anticipation that the material will be received within the next billing cycle. The CH shall track the transactions that have not been received and pay the invoice in full. If the material is not received within the next billing cycle, the CH will then dispute the item using established dispute procedures. In addition, pay and confirm procedures include damaged items received, which are still under warranty, where the contractor confirms he/she will replace, modify, or repair within the next billing cycle. The CH will reconcile the information on their statement by assigning the appropriate line of accounting. The CH will then attach all supporting documentation and forward to the AO. If an item has been returned and the credit voucher received, the CH will verify that the credit is reflected on the statement. The CH will retain the transaction documentation in a suspense file until the transaction or credit appears on the statement. If transactions and credits are not on the next monthly statement, the CH or AO will notify the Dispute Office contact to resolve and reconcile the statement. For any transaction that does not have a CitiDirect SDN, the AO must be contacted immediately, and the statement cannot be certified until advised by the APC. The CH must sign the monthly statement and forward it to the AO within two working days of receipt. If the CH cannot review the statement at the time it is received, the AO will review the CH's statement and submit the CITIBANK Account Summary for payment. The AO will meet with the CH upon his/her return to go over the CH's statement.

b. Missing Documentation. If for some reason the CH does not have documentation of the transaction to send with the statement, he/she must attach an explanation that includes a description of the item, date of transaction, merchant's name, and why there is no supporting documentation.

c. AO. The AO is responsible for reviewing and signing the CH's monthly statement of account and will accomplish the following:

(1) Reconcile the CH's monthly statement of account with the CITIBANK Account Summary;

(2) Ensure that all purchases accomplished by the purchase CHs within their cognizance are appropriate and the charges accurate;

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(3) Verify supporting transaction documentation on all card accounts prior to certifying the monthly invoice;

(4) Notify the CSO and APC in the event of any suspected unauthorized purchase (purchases that would indicate noncompliance, fraud, misuse, and/or abuse);

(5) Ensure proper receipt, acceptance, and inspection is accomplished on all items being certified for payment. Verify the existence of receipt and acceptance documentation by placing their initials in a corner of each of the CH's transaction receipts;

(6) Certify the monthly invoice within five days of receipt; and

(7) Return all supporting documentation to the CH.

d. Record Retention. Purchase related documents must be retained for ten years.

18. Billing Errors and Disputes

a. Questionable Items. If a CH receives a statement that lists an unrecognized transaction, the CH (or the AO) must notify the Dispute Office contact and complete the CITIBANK Government CH Dispute Form. This may include circumstances where the purchase CH did not make the transaction, the amount of the transaction is incorrect, or the quality of service is an issue. CITIBANK will credit the transaction until the dispute is resolved. In addition, a copy of the form must be attached to the CH's monthly statement and sent to the APC.

b. Defective Items. If items purchased with the card are found to be defective, the CH has the responsibility to obtain a replacement or correction of the item as soon as possible. If the merchant refuses to replace or correct the faulty item, then the purchase of the item will be considered in dispute. Items in dispute are handled in the same manner as billing errors.

19. Contact with CITIBANK. CHs will contact CITIBANK only to report a lost or stolen card. Direct all other questions to the APC or AO. CITIBANK has two dedicated Client Account Specialists. They can be reached by calling 1-800-790-7206 or collect 1-904-945-7850. Select option 4, then extension 69896 or 69880.

20. Lost or Stolen Cards

a. Telephone Notification. If the card is lost or stolen, it is important that the CH immediately notify CITIBANK by calling 1-800-790-7206.

b. Written Notification. The CH must also notify the AO and the APC of the lost or stolen card within one workday after discovering the card missing. The AO will submit a written report to the APC within one workday. The report will include:

- (1) Card number.
- (2) CH's complete name.
- (3) Date and location of the loss.
- (4) If stolen, date reported to police.
- (5) Date and time CITIBANK was notified.
- (6) Any purchase(s) made on the day the card was lost/ stolen.
- (7) Any other pertinent information.

c. Card Replacement. CITIBANK will mail a replacement card within one business day of the reported loss or theft. A card that is subsequently found by the CH, after being reported lost or stolen, will be cut in half and given to his/her AO or the APC. The APC will notify CITIBANK that the card has been destroyed.

21. CH Leaves the Command. Upon departure of a CH, the CH must surrender the card to his/her AO or APC 30 days prior to CH leaving the command. The APC will cancel the account via the CitiDirect web site.

22. Transfer, Retirement, or Termination of Employment. If a CH leaves the command, the CH account will be closed via the CitiDirect web site. If a CH is moved to a new AO, the account will be closed and a new account will be established under the new AO. However, the APC, AO, and CH will ensure that all transactions are completed and that there are no unresolved disputes before closing the account.

23. Internal Review of the Local Program

a. Monthly APC Reviews. Using ad hoc reporting, the activity APC shall conduct monthly transactional reviews. The review shall include all of the purchase card transactions within the previous month for all card accounts under the APC's cognizance. Results should be reported to the HA. The review shall target the following critical elements:

- (1) Suspicious vendors
- (2) Split purchases

(3) Equitable distribution of business

(4) Purchases exceeding the micro-purchase threshold

b. Semi-Annual APC Reviews. Semi-annual reviews shall consist of an evaluation of local operating procedures, internal management controls, and a transactional review using ad hoc reporting. A copy of the report shall be provided to the HA. The reporting periods for the semi-annual reviews shall encompass the months of April through September and October through March. The following areas must be covered in any purchase card program review:

(1) Review of internal operating procedures to ensure compliance with current DOD/DON regulations and directives

(2) Program compliance with applicable training requirements

(3) Appropriate delegations of authority

(4) Integrity of purchase request process

(5) Compliance with micro-purchase procedures

(6) Receipt, inspection, and acceptance procedures

(7) Invoice certification process

(8) Prompt payment issues

(9) Use of the purchase card as method of purchase vice a method of payment

(10) Span of control (card accounts to AO and card accounts to APC)

(11) Delinquencies

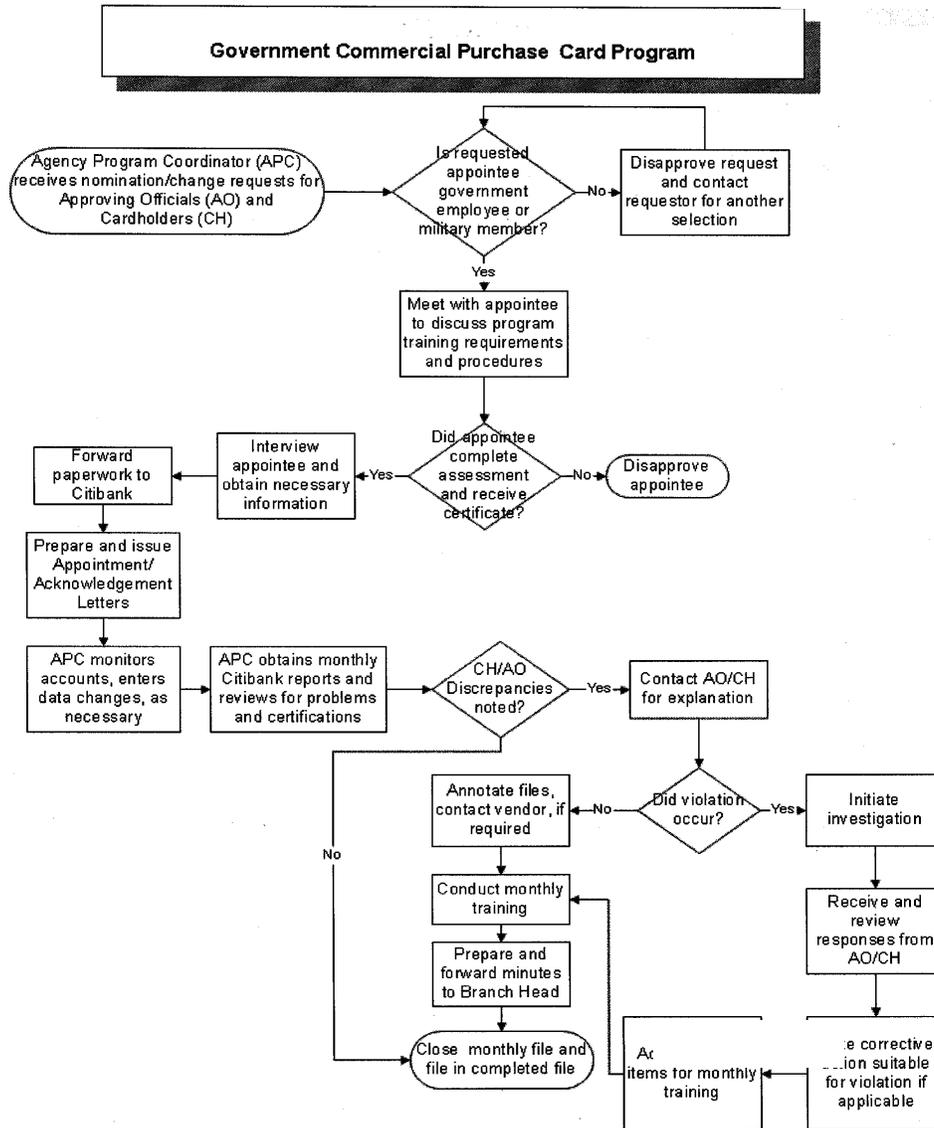
(12) Account spending limits

(13) Questionable transactions

(a) Purchases not required or fulfilling minimum, immediate need to support DON mission

(b) Purchases not for government use, but for personal use

- (c) Purchases that exceeded authorized limits
- (d) Requirements that were split to circumvent the micro-purchase threshold
- (e) Purchases that were prohibited items explained in the purchase card desk guide
- (f) Purchases from vendor locations that appear questionable in terms of mission requirements
- (g) Screening for mandatory sources
- (h) Equitable distribution of business



SAMPLE

SCHEDULE OF POTENTIAL GCPC OFFENSES AND
REMEDIES TO CIVILIAN EMPLOYEES

The chart below is one example of potential charge card offenses and remedies or penalties for such offenses. Components must otherwise comply with all applicable law and regulatory guidance in determining whether to impose disciplinary or adverse action in any specific case.

OFFENSES	FIRST OFFENSE	SECOND OFFENSE	THIRD OFFENSE
Unauthorized use of or failure to appropriately control use of Government Purchase Charge Card as a CH, AO responsible for use or oversight of the card	Letter of Counseling to removal	14-day suspension to removal	30-day suspension to removal

