

GPC SOP - Attachment 1  
USAMRAA FY20 Surveillance Plan

Section 1: GPC Reviews: (Reference Army Federal Acquisition Regulation Supplement (AFARS) Appendix EE, Section 4-2. Surveillance and Reviews, paragraph e. and Department of Defense (DoD) Transition Memorandum #6)

- Level 4 A/OPC will complete monthly review of Billing Official accounts in the Insights on Demand (IoD) system. The Level 3 A/OPC will confirm that reviews are completed.
- Level 4 A/OPC will identify and analyze trends and systemic weaknesses as a result of monthly transaction reviews and provide the data to the Level 3 A/OPC.
- Level 3 A/OPC will conduct semi-annual review of the Level 4 A/OPCs to ensure compliance with duties and responsibilities. The Level 3 A/OPC reviews must be documented and included in the Semi-Annual GPC Health Report submitted to the Senior Contracting Official (SCO).

Section 2: Metrics: (Reference AFARS Appendix EE, Appendix A, paragraph 11 and OMB Circular A-123, Appendix B, paragraph 5.1 & 5.4-5.5)

The Level 3 A/OPC will utilize metrics available in the US Bank Access Online (AXOL) system to ensure compliance with the following GPC requirements:

- Span of Control Waivers: For accounts with more than the mandated number of accounts (i.e., BO maximum of 7 CH's; A/OPC maximum of 300 accounts to manage), waiver will be granted by the Level 3 A/OPC.
- Accounts inactive for more than 3 months require justification to remain open.
- Number of BO accounts inspected, number of transactions reviewed for each BO, number of BO accounts reviewed during prior reporting period
- Number of CH accounts inspected, number of transactions reviewed for each CH (1 per CH preferred/6% sample size is DoD standard)
- Method of compliance review for BO and CH (IoD, AXOL, in person, remotely, or electronically)

Section 3. Appointment and Account Issuance and Maintenance for A/OPCs, BOs, and CHs: (Reference AFARS Appendix EE, Section 2, paragraph 2-1.)

- Level 3 and 4 A/OPC training requirement
- Is Level 4 A/OPC certified at Level II in Contracting or Purchasing or will the

individual

acquire the certification within 24 months of appointment?

- Organization's Delegation of Authority (i.e. SCO→ Chief of the Contracting Office (CCO), Level III A/OPC and Alternate, CCO→ Level 4 A/OPC and Alternate, Level 4 A/OPC or CCO→ BO and CH)
- Are appointment letters current?

Section 4. GPC Usage Requirements: (Reference AFARS Appendix EE, Section 4-2, paragraph c.)

The Level 4 A/OPC will ensure GPC usage is appropriate and mission essential as part of annual surveillance. Areas to be reviewed include:

- Adherence to GPC Program requirements: transaction activity; systemic problems, delinquencies and corrective action, abuse, or fraud; summary of adverse actions (type and number) against the responsible individual; formal reports issued to the CCO.
- Incidents of splitting purchases to override purchase thresholds
- Incidents of "After the fact" buys
- Rotating sources in order to give vendors a fair opportunity
- Use of mandatory sources, specifically CHESS, AbilityOne, FSS Blanket Purchase Agreements (BPAs) on FEDMALL Corridor
- Credits and rebates
- What Strategic Sourcing initiatives are in place?

Section 5. Documentation Requirements: (Reference SP3 Transition, Memorandum #6)

Level 4 A/OPCs will review the following Cardholder file documentation to ensure compliance:

- Back-up documentation pertaining to all GPC purchases must be uploaded and saved in US Bank's electronic AXOL system under Transaction Management.
- This process supports the GPC Daily, Monthly and Semi-Annual review cycle for the IoD system implemented by DoD under SP3 Transition Memorandum #6.
- All documents to support the transaction should be posted by the end of the month after the cycle closing date; however documents can be added after the cut-off date if unavailable by the end of the cycle closing date.
- File types that can be uploaded are PNG, JPG and PDF.
- Each transaction can have up to 5MB of data.
- Call the US Bank help desk number for assistance (888)-994-6722 if there are problems attaching files in AXOL.

Section 6. Processing Requirements: (Reference AFARS Appendix EE, Section 3-13 File Retention)

During annual surveillance, the Level 4 A/OPC will ensure that Billing Officials files are in compliance with the following requirements:

- The approving or certifying official maintains certified billing statements and supporting documents for six years and three months in accordance with National Archives and Records Administration (NARA), General Records Schedule (GRS) 6, "Accountable Officers' Accounts Records." See DoD Financial Management Regulation (FMR) Volume 15, Chapter 6 for additional information on document retention for accountable officers' records (10 years from the date of case closure for Foreign Military Sales).
- All financial records, both paper and electronic, will be retained documenting the GPC transactions in a file to include (1) the BO statement, (2) the CH statement, and (3) all original receipts and documentation for those statements.
- Receipts are considered supporting documents for the certified billing statement and in accordance with the DoD FMR, Volume 1, Chapter 9, must be retained for six years and three months after final payment. Original receipts are preferred; however, printed electronic forms or copies of an itemized receipt are acceptable. The receipt must be legible; goods must be itemized/detailed with the item description, quantity, price, and extended price; indicate vendor's name and address; date of the purchase; and must indicate paid by credit card or zero amount due. The BO maintains these records, either physically in his/her physical possession, or when appropriate transfers to a records holding area. However, if certifying electronically, the CH and BO may rely on the Servicing Bank recordkeeping for the BO and CH statements. Original records are the property of the U.S. Government and may not be removed from government control by the BO for any reason.
- Level 4 A/OPCs shall retain hard copy file documentation for Government credit card files documenting application for cards and approval, account maintenance, letters of GPC delegation (CH or BO), ethics certification (if applicable), required training certifications, results of annual reviews, and related information for three years after the fiscal year in which the card account is cancelled.
- Documents received and/or generated by the cardholder to support transactions shall be retained for six years and three months after final payment. Data residing in the bank's electronic access system is maintained by the bank for six years and three months. Reports may be retrieved from the Bank's electronic access system

(EAS) for the previous two years. Reports covering data for periods beyond the previous two years are available from the Bank upon request.

#### Section 7. Financial Requirements:

Rebate Reporting: Quarterly rebate reports received from US Bank's Government Representative will be used by the Level 3 A/OPC to determine USAMRAA's net rebates. This information will be shared with the SCO and CCO on a semi-annual basis as part of the GPC Program Health Report.

Root Cause Analysis: The Level 3 A/OPC will use reports provided by Level 4 A/OPCs upon completion of an agency's monthly and/or annual review to determine a root cause analysis to assess findings. This information will be included in the GPC Program Health Report.

#### Section 8. Convenience Check Review Process: (Reference AFARS Appendix EE, Section 4-2 Surveillance Reporting and Surveillance Reviews)

Convenience check accounts will be reviewed quarterly by a disinterested third party. The Level 4 A/OPC will ensure reviews are completed.

#### Section 9. GPC Accounts Used to Place Orders by Ordering Officer: (Reference AFARS Appendix EE, Appendix I and AFARS 5113.202-90 (c))

Ordering Officer accounts will be reviewed by the Level 4 A/OPC annually.

#### Section 10. Training Card: (Reference AFARS Appendix EE, Section 3-2 Use of the GPC for Training and Education)

The GPC Training Card will be used only to pay for classroom training and standard off-the-shelf courses. GPC Training Card accounts will be reviewed by Level 4 A/OPCs during annual site visits and inspections. Training card transactions flagged for additional review in IoD will also be reviewed by Level 4 A/OPCs as needed.

#### Section 11. Reports

The Level 3 A/OPC will utilize reports available through US Bank's AXOL system (i.e., total GPC purchases, Spend Analysis, High Risk Transactions, Total Number of Open Accounts, Past Due Payments, Convenience Check Reports) in order to provide better management and oversight of the USAMRDC USAMRAA GPC Program.

The Level 3 A/OPC will utilize reports available through IoD (i.e., BO transaction reviews, Level 4 monthly reviews, number of flagged transactions).

Section 12. Semi-Annual GPC Program Health Report (Reference AFARS Appendix EE, Section 4-2, paragraph h.)

The Level 3 A/OPC will provide a semi-annual health report of the GPC Program to the SCO identifying any repetitive problems and systemic weaknesses. The health report will also include results of the Level 3 A/OPC review of Level 4 A/OPCs' performance.

Section 13. Site Visits/Surveillance

The Level 4 A/OPC will provide a site visit with each agency whose GPC support is managed by USAMRAA. The site visit will consist of refresher training, review of BO and CH files, and addressing any questions BOs or CHs have about using of the GPC or any of the required systems, such as AXOL and IoD. The Level 4 A/OPC shall provide a summary report of each site visit conducted to the Level 3 A/OPC.

FY20 Site Visit Schedule:

October 2019: USAMRICD site visit completed by Level 4 A/OPC.

April 2020: AFRIMS; AFPMB; MC4; USAARL; TATRC

May 2020: MRDC HQ; CDMRP

June 2020: USAISR; USAMMDA; USAMRICD

July 2020: USAMRIID

August 2020: USARIEM site visit planned to be conducted while A/OPCs are TDY for the GSA SmartPay Training Forum

Required Reports:

- IoD Transaction Review – Level 4 A/OPCs will submit transaction review report to Level 3 A/OPC. MONTHLY
- Root Cause Analysis – Level 4 A/OPCs will submit findings from annual surveillance to the Level 3 A/OPC including determinations of root causes for unauthorized transactions and repeat findings. ANNUALLY
- Rebate Report – Level 3 A/OPC will review rebate report received from US Bank. Report will be included in Health Report to the SCO. SEMI-ANNUALLY 4/21/20 and 9/21/20
- Surveillance – Level 4 A/OPCs will review BO and CH accounts for compliance with established regulations. SEMI-ANNUALLY 4/30/20 and 10/30/20
- GPC Health Report – Level 3 A/OPC will provide this report to the SCO. SEMI-ANNUALLY 4/15/2020 and 9/15/20

