

IN REPLY REFER TO: MCINCR-MCBQ0 4200.4 C 20

MARINE CORPS INSTALLATIONS NATIONAL CAPITAL REGION-MARINE CORPS BASE QUANTICO ORDER 4200.4

- From: Commander
- To: Distribution List
- Subj: INTERNAL OPERATING PROCEDURES FOR THE GOVERNMENT-WIDE COMMERCIAL PURCHASE CARD PROGRAM
- Ref: (a) NAVSUPINST 4200.99B
 - (b) USMC GCPC SOP
 - (c) NAVSUPINST 4200.85D

1. <u>Situation</u>. Use of the Government-Wide Commercial Purchase Card (GCPC) shall be used for open market purchases that are below the micro-purchase threshold to satisfy appropriated funds purchases. The micro-purchase threshold is \$3,500 for supplies, \$2,500 for services, and \$2,000 for construction. The GCPC may also be used for up to \$49,999.99 for Defense Logistics Agency document services, as a method of payment of up to \$25,000 for commercial off the shelf training in conjunction with an approved SF182, and \$15,000 Continental United States (CONUS) or \$30,000 Outside the Continental United States (OCONUS) in support of approved contingency or humanitarian requirements.

2. <u>Mission</u>. To promulgate local GCPC Internal Operating Procedures (IOP) located in enclosure (1) for the Regional Contracting Office - National Capital Region (RCO-NCR) Marine Corps Base Quantico (MCBQ), program participants to supplement guidance contained in the references.

- 3. Execution
 - a. Commander's Intent and Concept of Operations
 - (1) Commander's Intent. To maintain the integrity of

the local GCPC by providing operation support and oversight with internal management controls.

(2) Concept of Operations

(a) The RCO-NCR MCBQ has staff cognizance over the GCPC program and is guided by references (a) through (c) in the performance of his/her duties.

(b) Under the provision of reference (a), Commanders are reminded the purchase card shall not be used to purchase items that exceed the Government's minimum needs in terms of quality and quantity. All purchases shall adhere to the necessary expense rule in that they must bear a logical relationship to the appropriation to be charged, not prohibited by law, and the expenditure is not applicable to subject to other funding appropriation.

b. Subordinate Element Missions

(1) The RCO shall:

(a) Be responsible for the operation of the program contractual authority vested in the office; and

(b) Appoint a Level IV Agency Program Coordinator, in an official letter of delegation, to be responsible for dayto-day oversight and audit management of the program.

(c) The Level IV Agency Program Coordinator shall provide administrative and program management controls for Level V Agency Program Coordinators who manage Level VI base or tenant command Approving Official and Cardholder accounts.

(2) General and Special Staff Department Heads shall:

(a) Be responsible for performing oversight of their local program following the guidance provided in this Order and its associated references; and

(b) Upon receipt of information that a civilian employee or military service member has participated or engaged in fraud, misuse or abuse of a purchase card, shall investigate and take appropriate corrective or disciplinary action. The responsible party/parties should be afforded the opportunity to make restitution by check or money order payable to the U.S. Treasury via the unit/agency comptroller.

- c. Coordinating Instructions
 - (1) National Capital Region/Tenant Commanders

(a) Be responsible for performing oversight of their local program following the guidance provided in this order and the associated references; and

(b) Upon receipt of information that a civilian employee or military service member has participated or engaged in fraud, misuse or abuse of a purchase card, the commander shall investigate and take appropriate corrective or disciplinary action. The responsible party/parties should be afforded the opportunity to make restitution by check or money order made payable to the U.S Treasury via the unit/agency comptroller.

4. <u>Administration and Logistics</u>. Administration concerning the contents of the Order will be submitted to the Commander, MCBQ, via the appropriate chain of command.

5. Command and Signal

a. <u>Command</u>. This Order is applicable to all personal assigned to MCBQ.

b. Signal. This Order is effective the date signed.

J.M. MURRAY

Distribution: A

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Introduction

1. <u>Introduction</u>. The GCPC program is a mandated procurement method for authorized personnel to purchase supplies and services below the micro-purchase threshold for official Government use. This IOP supplements guidance contained in references (a) through (c).

a. Micro-purchase threshold means \$3,500 for supplies or:

(1) \$2500 for service(s);

(2) \$2000 for construction; or

(3) \$15,000 CONUS and \$30,000 OCONUS for Contingency/Humanitarian Operations.

b. The GCPC may also be used for the following:

(1) \$25,000 as a method of payment for Commercial off the Shelf (COTS) training;

(2) \$49,999.99 for Defense Logistics Agency, Document Service;

(3) A method of payment for contracting methods above the micro-purchase threshold.

2. <u>Guidance</u>. The Consolidated Card Program Management Division (CCPMD) provides centralized operational control and management of Department of the Navy (DON) card programs.

a. Naval Supply Systems Command provides GCPC policy. Instruction manuals and procedural guidance are available at the CCPMD web-site https://www.navsup.navy.mil/navsup. Please contact Agency Program Coordinators (APC) for have any questions.

(1) Reference (a), DON Policy for Operation and Management of the GCPC;

(2) Desk Guides for APC, Approving Officers (AO) and Card Holders contain information on day-to-day operations;

(3) Purchase Card Policy Notices provide new policy

guidance;

(4) Purchase Card Administrative Notices are administrative announcements;

(5) Reference (c) Simplified Acquisition Procedures Manual; and

(6) CCPMD notices and training updates.

b. <u>United States Marine Corps (USMC), GCPC Standard</u> <u>Operating Procedure (SOP)</u>. The SOP provides specific GCPC policy and guidance for all USMC commands and activities using appropriated funds. The SOP is part of the USMC Contract Management Process Guide, designed by Headquarters Marine Corps (HQMC), Assistant Deputy Commandant, Installations and Logistics for contracting personnel and their customers. http://www.hqmc.usmc.mil/cmpg/.

c. <u>RCO-NCR-MCBQ GCPC</u>. This IOP is published in accordance with references (a) and (b). Instructions in this IOP provide supplemental policy for personnel participating in the RCO-NCR-MCBQ GCPC program.

(1) Purchase Card Office Notices are supplements to the GCPC IOP that provide new policy or procedural guidance.

(2) The APC may publish periodic news letters to provide reminders, policy updates or procedural guidance.

Program Management

1. <u>Authority and Responsibility</u>. The GCPC has seven levels of authority and hierarchy within Department of the Defense (DoD), DON, and the Marine Corps.

- a. DoD. Level I Manager GCPC
- b. DON/CCPMD Level II. Manages Navy and Marine Corp GCPC
- c. HQMC APC Level III. Manages Marine Corps GCPC
- d. USMC APC Level IV. Manages Marine Corps Regional GCPC
- e. USMC APC Level V. Manages Marine Corps Local GCPC
- f. USMC AO. Manages Marine Corps Unit level
- g. USMC CH. USMC Purchasing Agent limited to the GCPC

2. <u>Key Program Personnel</u>. Key personnel are the Head of the Activity (HA), RCO Chief of the Contracting Office (CCO), APC, Commanding Officer/Department Head (CO/DH), Comptrollers/Financial Managers (FM), AO, and CH. Their roles and responsibilities are detailed in references (a) and (b) with additional direction in this IOP.

a. The HA is responsible for support and sponsorship of all participants in the GCPC. The Commanding General is the HA unless he has delegated authority within his office to another individual to be the HA for RCO-NCR-MCB Quantico.

b. The RCO CCO is responsible for the coordination and execution of the GCPC. The RCO CCO has delegated the GCPC duties to the Level IV APC.

c. The unit level CO/DH must include the GCPC in their management control checklists and ensure suspected GCPC misuse, abuse and fraud are appropriately investigated.

3. <u>Accountable Officials</u>. APCs, AOs, CHs, and FMs are key personnel that provide information for certification of a voucher for payment. They may be subject to pecuniary liability for erroneous payments caused by their negligent actions. a. The Level IV (Regional) and Level V (Activity) APC are responsible for day-to-day oversight and program management and duties are detailed in reference (a).

(1) Level IV APC duties are described in reference (a),

(2) Le V APC duties are described in reference (a),

(3) Reviewing Program Audit Tool (PAT) submissions five days after statement closes.

(4) Resolving delinquencies within ten days of statement closure.

(5) For additional duties see reference (a) page 2-3 thru 2-6 that applies to conducting monthly 100% review of transactions.

(6) Provide all required reports by level IV.

b. The AO and Certifying Official are synonymous for the GCPC. AOs are the first line of defense against misuse, abuse and fraud.

(1) The AO is nominated by letter from the CO/HA at the activity level. See (Appendix B-1).

(2) The APC appoints the AO by letter. The AO acknowledges the appointment by signature on the appointment/delegation letter and by signature on the Appointment/Termination Record (DD Form 577). APC then has to forward original DD577 to DFAS and make part of files.

(3) Alternate Approving Officials (AAO) have the same authority and responsibilities as the AO and are appointed in the same manner.

(4) For additional duties for the AO/AAO reference (a), pg 2-6 thru 2-7.

c. The APC appoints the CH by letter as Ordering Officers for the GCPC program.

(1) The CH is nominated by letter from the CO/HA or AO at the activity level. See Appendix (B).

(2) The CH acknowledges the appointment by signature on the appointment/delegation letter and by signature on the DD Form 577.

(3) For duties as a cardholder see reference (a), pg 2-9.

4. <u>Financial Manager (FM)</u>. Comptrollers/FM are responsible for the allotment of Unit/Agency funds; assigning Reporting Unit Codes; assigning default Lines of Accounting (LOA) and adding or changing default and alternative LOAs in Citibank. FMs will provide the default LOA and sign Section III of the AO/CH Set-up Form. For additional duties see reference (a), pg 2-9.

Program Requirements

1. <u>Personnel Requirements</u>. Civilian Government employees and members of the Armed Forces are eligible for the GCPC. Contractors may not be assigned AO or CH duties.

2. <u>Separation of Duties</u>. AOs shall not be assigned CH or APC duties in the same hierarchy. Under no circumstances shall any CH be their own AO. To ensure proper supervision, the AO and CH should be co-located. The funds approver cannot be the AO or CH. Neither the funds approver, AO nor CH can be the requestor and receiver of the item(s) procured with the purchase card. For additional information refer to reference (a), pg 3-2.

3. <u>Training</u>. Four online tutorials and local policy training IOP are required for all APCs, AOs and CHs. Contact APC for training information/instruction. Additional information on training is located in reference (a), pg 3-2.

a. Defense Acquisition University (DAU), DoD Government Purchase Card Training is a one-time requirement http://www.dau.mil/default.aspx

b. DON Purchase Card AO/CH Certification provided by CCPMD, is required every two years https://www.navsup.navy.mil/ccpmd

c. DoD Standards of Conduct Office, Annual Ethics Training is a fiscal year requirement https://www.navsup.navy.mil/ethics

d. Overseas Shipments AO/CH Certification provided by NAVSUP. Training is a onetime requirement. https://www.navsup.navy.mil

e. CO Training- Approving Officials only (certifying officials) https://wwww.dau.mil CLG 600

f. An OGE Form 450 is required for CHs that purchase more than \$100,000 and AOs that certify payment documents, for more than \$100,000 per fiscal year;

g. Local Policy Training is provided by the APC and is required every two years;

h. CO/AO/AAO- Training- provided with local training.

i. Hierarchy-Below is RCO-NCR/MCBQ hierarchy information to use for testing. The Level IV, V and VI is needed when preparing to take the training exams.

(1) Level III 00027

(2) Level IV 00096

(3) Level V - 00264 (Base) 00264 (HQMC) 000999 (TECOM)

(4) APC name to utilize when required is Barbara

4. <u>PAT Training</u>. PAT training for AO's is available on the DON CCPMD site. PAT training for the AO and the AAO will be given when IOP training is conducted.

5. Local Policy Examination. Local policy examination supplement training reinforces AO/CH knowledge and gauges the effectiveness of the material presented.

a. The exam is given with IOP with in-house training.

b. A score of less than 80 percent will require additional training and reexamination.

Account Information and Procedures

1. <u>Safeguarding the GCPC Cards</u>. It is the CH's responsibility to ensure the card is safeguarded. Additional information is located in the reference (a), page 2-8.

a. Only the CH is authorized to make purchases with the card. Under no circumstance will a CH loan or let anyone make purchases with their card.

b. CHs must maintain physical security of their card and secure documents with card information to prevent unauthorized use.

c. Any attempt of coercion or request for fraudulent use of the card must immediately be reported up the chain of command and to the APC.

d. Cards should be locked in a secure location. If the CH does not have a locked desk then they should obtain a safe to lock up their GCPC card. They should not carry their card unless they are going out to procure the items.

2. <u>Reporting Lost or Stolen Card</u>. To report a lost or stolen card, the CH shall call Citibank (1-800-790-7206) immediately. Citibank will mail a new card to the APC upon notification. The CH shall provide written notification to the AO and APC stating:

a. The last six digits of the card account number;

b. Date, time and location when loss became evident;

c. Date and time the bank was notified;

d. If the card is stolen, provide date and time theft was reported to police; and

e. List of purchases made after the card was lost or stolen.

3. <u>Procedures to Check-out of the Program.</u> AOs and CHs shall notify the APC 30 days before they conclude their duties with the program. Missing files will have a memorandum for the

record endorsed by the commander of their designee when turned over to the AO. The CH is to cut up or shred credit card in the presence of the AO. The AO is to forward e-mail to the AAPC. If the AO is not present or available then the CH is to destroy the card and send the AO and AAPC an e-mail.

a. The AO must verify all outstanding charges are reconciled before the CH gives the card to the APC.

b. Accounts/cards not used more than three times within a six month period may be administratively closed for inactivity. The APC must contact the AO to inquire about the status of the account before the APC closes the account.

4. <u>Maintenance and Retention of Records</u>. Per reference (a), page 4-5, the DD Form 577 and financial documents (invoices, dispute documentation, receipts, etc.) shall be retained for a period of 10 years.

Purchase Card Procedures

1. <u>Purchase Card Limits and Authority</u>. The AO and CH delegation letter will specify their authorized spending limits. The cycle spending limit is based on usage data and may be changed by request of the AO or FM.

a. The single purchase limit for the CH is \$3,500 except for the following:

(1) \$2,000 for acquisitions of construction subject to the Davis-Bacon Act. Construction means erection, expansion, extension, alteration of an existing facility, e.g., repair to central heating/air conditioning system, plumbing, windows or panes, doors, roof, etc. (reference (c));

(2) \$2,500 for acquisitions of services subject to the Service Contract Act. Services are firm-fixed priced, nonpersonal, commercially available requirements for repairs, maintenance, annual maintenance agreements, e.g., cable, cellular phones, etc. (reference (a));

(3) \$15,000 CONUS and \$30,000 OCONUS for acquisitions of supplies or services to support a humanitarian or contingency operation;

(4) \$25,000 as a method of payment in conjunction with the SF 182 for COTS training; and

(5) \$100,000 for DLA Document Service, printing requirements.

b. Since the Davis-Bacon Act and Service Contract Act apply only to CONUS, the micro-purchase threshold for OCONUS is \$3,000 for supplies, services and construction.

c. Warranted Contracting Officers may use the GCPC as a method of payment in conjunction with other contracting methods for actions above the micro-purchase threshold.

d. Splitting a requirement/purchase by time, vendors, items, or CHs to circumvent the micro/single purchase limit is prohibited by law. See Chapter 8, paragraph 2c of this IOP.

e. The purchase card will not be used to pay unauthorized commitments.

2. <u>Purchase Card Request Form (PCRF)</u>. CHs shall prepare a PCRF, appendix c, before each purchase. The CH will fill out the PCRF completely to reflect the proper research was conducted and approvals granted. Boxes must be checked for questions, and printed names and signatures or digital signatures of the CH, Funds Administrator (FA) and AO.

a. Requestor Information

(1) The requestor's name, section and the date requested must be present.

(2) Provide a layman's description of the item. If there is an attachment, a brief description of the item/s requested is required.

(3) The justification shall clearly state why this purchase is necessary. (In the absence of the requestor and CH, the justification must be able to stand on its own).

b. <u>Pre-Purchase Checklist</u>. These questions must be answered before each purchase. Do not pre-check the boxes.

(1) <u>Prohibited items</u>. For a complete listing of prohibited items refer to reference (c). For additional guidance on prohibited items see reference (a). Purchases such as services above \$2,500.00 (calendar year or event), ammunition, and parts to modify a weapons system, vehicle repair, and owned / leased/rented equipment are prohibited. Travel related expense, petroleum, toner cartridges from other than required source, and delivery services other than correspondence is also prohibited.

(2) For Hazardous Material (HazMat) there must be correspondence from the Unit/Agency HazMat Officer authorizing the requirement.

(3) Pilferable items with a ready resale value or applicable to personal use must have a property control log.

(4) <u>Restricted/Personal use Items</u>. The U.S. Treasury must be reimbursed for all items purchased for personal use or personal benefit of an individual. Coffee, creamers, Gatorade, or any other refreshments are personal. Condiments, paper

plates/knifes/utensils; etc are also considered personal.

(5) <u>Prohibited and Special Attention Items</u>. There are special attention items which should be reviewed that fall within compliance concerning regulations contained in reference (a) and (c).

(6) <u>Special Attention and Approval Internal Listing</u> <u>requirements</u>. RCO-NCR-MCBQ requires internal waivers or approvals that are required for the GCPC program. The cardholder should screen these listing in enclosure 1 of this IOP before purchasing the items.

(7) Coins must have a unit awards program established or a letter signed by the CO. All coins must have a coin log pertain to the issuing of the coins.

c. <u>Screening Required Sources of Supply</u>. It is the CH responsibility to screen required sources in the order listed regardless of where the request form originated. All required mandatory sources should be checked and the majority of items that need to be procured can be obtained from one of these mandatory sources.

(1) All purchases of office supplies shall be from Base supply Stores/Servmarts or USMC Virtual Servmart using the DSSC card or DoD Email, no exceptions. Office supplies are defined by General Service Administration (GSA) Federal Supply Schedule 75.

(2) Buy Green "environmentally preferable" products and services. Environmental Protection Agency and GSA websites have guides to assist personnel responsible for procuring activity requirements.

d. <u>Vendor Notification</u>. These items must be verified with the vendor before requesting the supply or service. CHs must advise merchants, ''The GCPC is for official U.S. Government business and is not subject to state, local or federal taxes". GSA state tax exemption letters may be obtained at: www.gsa.gov.

e. The vendor's name, address, telephone number, and contact information are required.

(1) When using a DoD email or a GSA vendor, write the vendor's name on the PCRF.

(2) The vendor name on the PCRF and Purchase Card Log must match the bank statement.

(3) Print and attach the DoD email order confirmation to the PCRF.

f. <u>Order Information</u>. Assign a call number to each purchase. The date of the order must be on or after the CH, FA, and AO signature date.

g. <u>Required Signatures</u>. Three original or digital signatures are required before each purchase (CH, FA, and AO), Two original signatures are required after each purchase (Receiver of Goods (ROG), and AO verification). Original signatures must be dated by the signee. All names must be printed, typed or digitally signed.

(1) It is the CH's responsibility to obtain the FA signature. Neither CH nor AO may sign as funds approver.

(2) The FA is an agency/unit representative who verifies by signature on the PCRF, that funds are available before the purchase.

(3) The CH will sign the PCRF certifying that the prepurchase checklist is accurate and the required sources have been checked.

(4) The AO will verify the FA signature, the CH signature and certify that the purchase is necessary for official government use by signing the PCRF.

(5) The ROG is a government official who verifies receipt and acceptance of the supply/service by physically signing or digitally signing the PCRF. AOs, CHs and contractors may not sign as ROG. The ROGs on the PCRF must match the call log.

(6) After the receipt of the supply or existence of a receipt/invoice and acceptance, the AO must physically or digitally sign.

(7) Digital signatures are allowed.

3. <u>Placing the Order</u>. The GCPC may be used for telephone, internet or in-store purchases. Use of PayPal or similar third party payment processors must be avoided whenever possible. The only exception is when no other source for the item/service is available and CH must document the file. Contact Citibank if the card is declined. If the decline is for a blocked Merchant Category Code, CH is to call the bank and ask what the decline code is. The CH then will e-mail or contact the Level V APC for instruction to process code to go thru for procurement. The code may require a force authorization so the APC will forward instructions to the CH.

4. <u>Purchase Card Log</u>. CH will make a log entry in call number sequence immediately following the purchase of supplies or services. Each CH must prepare and maintain a log, Appendix D.

a. Call numbers are recorded in sequence on the GCPC log (e.g., BCOMO1-001, BCOM01-002, etc.). Start a new call number sequence at the beginning of each fiscal year).

b. A Purchase Card Log will be attached to the CH's statement for each billing cycle along with PCRF and all other documentation for the file.

c. The CitiDirect on-line purchase card log is mandatory for reporting transactions made in support of a declared humanitarian or contingency operation.

d. Property Log-All items should have some kind of internal accountably. A property log should be keep for all items that are considered pilferable.

5. <u>Commercial-off-the-Shelf COTS</u>) Training. AOs will verify SF-182 training requests are for training regularly scheduled, open to the general public (e.g. an event, conference, or instructional service), and priced the same for everyone in the same category (i.e., price per student, course, program, service, or training space). For training requirements the CH must ask the company before purchasing the training if the training is "off the shelf commercial training" and then document the file. Training must be in compliance with reference (a) and (c). CH must document that the training is off the shelf training. CH may utilize attached commercial determination checklist referenced in Appendix E-1 or check the RCO Worksheet that the training is COTS. CH must use this checklist if he does not document the files that the training is off the shelf commercial training. CH must make sure training is in compliance with reference (c) page 76-78. See Appendix 5.

a. Known requirements for commercial training events greater than \$25,000 shall not be broken into multiple increments to avoid the \$25,000 training threshold.

b. On occasion it may be cost effective to request the instructor provide training at the base, rather than pay travel and per diem to the instructor's location. In those cases, the contracting office will negotiate the total price and any related terms and conditions such as providing government facilities and include them in the contractual agreement.

6. Mission procurement requirements in areas pertaining to activities under the cognizance of RCO-GCPC program that may be purchased. Activities may purchase but are not limited to the below categories.

a. Training and Education Command - 00999: training, schools, educational services, miscellaneous personal service, miscellaneous business services, government to government, courier services, miscellaneous general merchandise (book stores, membership organizations), hotel's for conference room rentals, subscriptions merchants.

b. MCBQ - 00264: (Base and Tenant Activities) motelconference room rentals, courier services, cable services, utilities services, food with exceptions, department/variety store purchase for various items, miscellaneous general merchandise, miscellaneous specialty stores for lumber, hardware, lawn, garden, clothing with approvals, furnishings, equipment of various types, miscellaneous personal and business services, and school and educational services.

c. HQMC - 00265: (HQMC and Tenant Activities) motelconference room rentals, courier services, cable services, utilities services, food with exceptions, department/variety store purchase for various items, miscellaneous general merchandise, miscellaneous specialty stores for lumber, hardware, lawn, garden, clothing with approvals, furnishings, equipment of various types, miscellaneous personal and business services, and school and educational services.

Citibank Access, Reconciliation, Verification, and Certification

1. Citibank Access

a. To access Citibank, go to the home page URL: https://home.cards.citidirect.com/CommercialCard/Cards.html.

b. CHs select "self-registration for card holders" and follow the registration instructions.

c. AOs receive two emails from Citibank. The other contains a registration ID. Select "self-registration for non-card holders", copy and paste the pass code and ID and follow the instructions.

d. To maneuver in Citibank select "Web Tools" in "CitiDirect Card Management System", "SP-2" then "Inbox".

2. <u>Certification</u>. The billing cycle begins on the 20th of each month and ends on the 19th of the following month. During the cycle, the statement status is "interim". At the end of the cycle, the status changes to "new". CHs and AOs have five working days to certify their statement for payment. When the CH completes their certification the status changes to "pending approval". The status changes to "reviewed", then "closed" as the AO reviews CH's statements and certifies the account for payment. Manual certification may be required in some instances. Please reference CO training package for additional information.

3. <u>Cardholder Reconciliation</u>. Before certifying the statement for payment CHs will review all transactions on the statement annotate call numbers (from the call log) beside each transaction and verify charges, credits, outstanding disputes, or refunds.

a. Use the "Pay and Confirm Procedures" when the CH has been billed and has not received the items ordered.

(1) The CH shall confirm with the vendor that the supply ordered is in transit.

(2) Reconcile the monthly statement in full anticipation the supply will be received.

(3) Track the transactions, if the supply is not

received within the next billing cycle, the CH will then dispute the item (see paragraph below).

(4) Pay and confirm procedures are used when damaged items are received, are under warranty, or when the vendor confirms replacement or modify/repair within the next billing cycle.

b. Disputes must be submitted when pay and confirm procedures have failed and when erroneous charges appear on the CH's statement.

(1) The CH must contact the vendor to attempt to resolve the charges, and if they cannot be resolved with the vendor, notify APC (PAT reportable) charge.

(2) Call Citibank (1-800-790-7206) to dispute the

(3) Complete and fax a dispute form to Citibank.

(4) Disputes must be submitted to Citibank within 60 days of the transaction postdate.

c. <u>Online Certification</u>. To certify: Login to Citibank, select "Web Tools", "CitiDirect Card Management System", and then "SP2".

(1) Select "Inbox", "Current Status" and Current month;

(2) Check the indicator to verify each transaction; proceed;

(3) Select "Submit", add comments if needed and

(4) A certification statement appears; right click the mouse and print the statement;

(5) Proceed, status changes to "Pending Approval";

(6) Print, sign and date the statement;

(7) Annotate the call number from the call log next to the transaction on the statement; and

(8) The AO must reconcile the CH statement, then sign and date the CH certification statement.

4. AO Reconciliation

a. AOs will reconcile their statement with the CH documents and verify sales receipts or invoices are present.

b. AOs will also verify receipt and acceptance has occurred by signing the verification on the PCRF.

c. If the CH is unavailable or unable to reconcile the statement, the AO will certify the statement (and reconcile when the CH is available).

d. AOs certifying electronically are required to print, sign and maintain their monthly statement for each billing cycle.

Note: To print the statement. On the Home Landing Page select "Card Number Equals"; use drop down select "contains"; enter the last six digits of the AO account number. Select the following: "Search", "View Statements", (to right in small red letters), "Download", select PDF, and Download.

e. AO Certification. To certify:

(1) Login to Citibank, select "Web Tools", "Citidirect Card Management System" and then "SP2".

- (2) Go to "Inbox", "Current Status current month;
- (3) Select CH statement, and reconcile each transaction;
- (4) You can dispute any incorrect transaction;
- (5) Select "Approve", a note box appears, proceed;
- (6) Statement appears, print statement and "Certify";
- (7) For more than one CH, repeat steps 2, 3 and 4; and
- (8) If there are no charges; no action is required.

5. <u>Delinquency</u>. Failure to certify the statement for payment five working days after the cycle ends will cause the account to be suspended. See chapter 8, paragraph 3 of this IOP.

6. AO Payments Confirmation

(a) AOs are responsible for checking payments once they have been submitted to DFAS.

(b) Instructions for AO payment confirmation is located in https://home.cards.citidirect.com/CommercialCard/Cards.html AO is responsible for checking payments for their account to see if payment has been made 2 weeks after certifying monthly statement. Below is how you can check in Citibank:

- 1. Log in
- 2. Click on Web tools
- 3. CitiDirect card management system (SP2 accounts) this will take you into Citibank
- 4. Click on statements
- 5. Enter AO account number

This will bring up the Approving Official statements with all payments that have been made under their account. Approving Officials should print out a copy and put with their payment files.

Program Oversight and Review

1. <u>Program Oversight</u>. APC audits and PAT are file reviews designed to teach, prevent, identify, and provide corrective action in instances of misuse, abuse, fraud, or mismanagement. It is the AO's responsibility to ensure files requested for audits are sent to the APC.

a. A complete Purchase Card transaction file has a completed PCRF, invoice/receipt, waiver (if required), accountability document for pilferable items (if required), SF 182 (for training), and any other supporting documents, e.g., proof of non-availability and/or emails.

b. A complete CH file is kept in chronological sequence by Citibank statement with a monthly purchase card log, Certification statement and a complete purchase request file. A monthly folder is the preferred method of storage. Files kept in binders may be perforated and will be separated by billing cycle.

c. A complete AO file has a signed monthly statement and a signed monthly certification statement.

2. Audit Procedures, Reviews and Audits

a. <u>Audits</u>. There are a series of audits and disciplinary guidelines to teach, prevent, identify, and take corrective action in instances of misuse, abuse, fraud, or mismanagement of the GCPC.

b. <u>Monthly Audit</u>. APC's will perform a 100 percent transactional review of all CHs. This can be done by pulling an All Transactions Report and screening it for misuse, abuse and prohibited purchases. The monthly review, coupled with PAT can reduce risk of inappropriate activity. The AAPC will send an e-mail as to when audits are to be completed.

(1) At a minimum, APC's will perform a 10 percent Purchase File Review; looking at all aspects ensure the file is in compliance with reference (a).

(2) The APC will submit required reports to the higher level APC within the program. The level IV APC will request

reports in a standard required process for all APC under the level V hierarchy.

(3) Significant discrepancies may cause the account to be suspended and may require the AO and CH complete additional training or a 100 percent purchase file review.

(4) Level V APC may perform an external review of each level VI under RCO-NCR-MCBQ GCPC program. The level V should inspect at least four level IV accounts per district during the fiscal year. The IV APC and the activity will receive a copy of the findings.

c. <u>Annual External Audits</u>. Annual external audits may be scheduled and performed by the APC. Original PR documents, monthly statements, certification statements, training certificates, delegations letters, and DD Form 577 will be inspected. The AO will receive a copy of the findings.

(1) <u>Audit findings</u>. There is not a single response appropriate for all audit findings because the merits of each review may vary. Timeliness, proportionality and the exercise of judgment and common sense are important in determining the appropriate response. The inspected account will have an opportunity to correct minor deficiencies during and immediately after the review. Results will be forwarded to the AO to make corrections, if needed, before the next external audit is conducted. The following are the three review result categories:

0% - 15% Findings: SATISFACTORY

15% - 30% findings: MARGINAL

30% and above: UNSATISFACTORY

(2) Significant discrepancies may require the AO and CH to repeat the local training class IOP.

3. <u>Fraud and Abuse Indicators</u>. During audits/reviews APCs will look for indicators of fraud and abuse, such as

a. Multiple bills or invoices for same item(s) purchased.

b. Missing Invoices; for companies with different names, with the same address and with the same owner.

c. CH has a preference for a vendor(s) (minimal rotation among qualified vendors).

d. Indicators of a split purchase:

- (1) Identical amounts and descriptions;
- (2) Receipts exceeding \$3,000 for supplies;
- (3) Receipts exceeding \$2,500 for services;
- (4) All items purchased on the same day;
- (5) Sequential invoice numbers;
- (6) No receipt provided;
- (7) Same vendor invoice and job order numbers;
- (8) Copies of original documents, missing documents;
- (9) PCRF predated or dated the same as the invoice.

4. <u>Property Management Procedures</u>. Items with a ready resale value and applicable to personal use should be recorded on a unit/agency property control log. See Appendix D.

Disciplinary Guidelines

1. <u>Discipline Guidelines</u>. The GCPC shall only be used for authorized U.S. Government purchases. Intentional use of the purchase card for other than official Government business will be considered an attempt to commit fraud against the U.S. Government. If fraud is suspected, documentation will be provided to the command for investigation and disciplinary action as required.

2. <u>APC Actions</u>. There is not a single response appropriate for all audit findings because the merits of each review may vary. Timeliness, proportionality and the exercise of judgment and common sense are important in determining the appropriate response. These disciplinary actions are for first, second and third offense is within a fiscal year. If violations continue overlapping fiscal years the account will be reviewed by the HA and the level IV APC for course of action to take concerning disciplinary action. Reference (a), pages 6-1 thru 6-2.

a. <u>Purchase of Personal Use Items (reimbursement required)</u>. Suspend account and conduct an investigation. Suspend CH account only.

b. <u>Unauthorized Use (reimbursement required)</u>. Requires the CO's letter describing whether disciplinary action was taken and whether personnel involved are to be retained in the program.

c. <u>Splitting Requirements</u>. Splitting a requirement will cause the account to be suspended. The AO, AAO and all CHs listed on the account may be required to attend remedial training before the account is reinstated. Reference (a), pg D-6.

(1) <u>First Offense</u>. Letter of warning will be issued to activity.

(2) Second Offense. Suspend account for 14 days.

(3) <u>Third Offense</u>. Suspend account for 30 days and request command assistance for decision of longer suspension. This action will be reviewed and the decision will be made by the level IV APC and the HA. The AO shall submit a letter from their CO endorsed through the chain of command to the CO explaining the circumstances and procedures implemented to avoid

Recurrence. Repeat offenders may be subject to removal (AO and CH) from the GCPC program. A third occurrence within one year may subject a command to removal of the individual from the program. This action will be reviewed and the decision will be made by the level IV and the HA.

d. <u>Purchase of Prohibited Items</u>. If a CH purchases a prohibited item listed or referenced in Appendix C, such as a gift, the account will be suspended until the AO provides the APC a letter from their CO explaining the circumstances and procedures implemented to avoid recurrence.

(1) <u>First Offense</u>. Letter of warning will be issued to activity.

(2) Second Offense. Suspend account for 14 days.

(3) <u>Third Offense</u>. Suspend account for 30 days and request command assistance for decision of longer suspension. This action will be reviewed and the decision will be made by the level IV APC and the HA. The AO shall submit a letter from their CO endorsed through the chain of command to the CO explaining the circumstances and procedures implemented to avoid recurrence. Repeat offenders may be subject to removal (AO and CH) from the GCPC program. A third occurrence within one year may subject a command to removal of the individual from the program. This action will be reviewed and the decision will be made by the level IV and the HA. Reference (a), pg D-6.

e. Accounts that commit repeat offenses will be subject to longer suspensions or permanent removal from the program. Options for resolution of prohibited items purchased are as follows:

(1) CO makes a necessary expense determination;

(2) CH or benefactor reimburses the Government; and

(3) The purchase is obligated under an allowable appropriation (i.e., switched from Operations and Maintenance funding to Marine Corps Community Services).

f. <u>Exceeds Minimum needs</u>. A purchase exceeds the Governments minimum needs wherein it is excessive in terms of quantity or otherwise exceeds the minimum requirements otherwise exceeds the

minimum requirements to satisfy and support the Government. For additional information see NAVSUPISNT 4200.99B, pg D-3.

(1) <u>First Offense</u>. Letter of warning will be issued to activity.

(2) Second Offense. Suspend account for 14 days.

(3) <u>Third Offense</u>. Suspend account for 30 days and request command assistance for decision of longer suspension. This action will be reviewed and the decision will be made by the level IV APC and the HA. The AO shall submit a letter from their CO endorsed through the chain of command to the CO explaining the circumstances and procedures implemented to avoid recurrence. Repeat offenders may be subject to removal (AO and CH) from the GCPC program. A third occurrence within one year may subject a command to removal of the individual from the program. This action will be reviewed and the decision will be made by the level IV and the HA.

g. <u>Failure to use mandatory sources</u>. An open market purchase of a supply or service that was available from a Government source of supply. Reference NAVSUPINST 4200.99B, pg D-4.

(1) <u>First Offense</u>. Letter of warning will be issued to activity.

(2) Second Offense. Suspend account for 14 days.

(3) <u>Third Offense</u>. Suspend account for 30 days and request command assistance for decision of longer suspension. This action will be reviewed and the decision will be made by the level IV APC and the HA. The AO shall submit a letter from their CO endorsed through the chain of command to the CO explaining the circumstances and procedures implemented to avoid recurrence. Repeat offenders may be subject to removal (AO and CH) from the GCPC program. A third occurrence within one year may subject a command to removal of the individual from the program. This action will be reviewed and the decision will be made by the level IV and the HA.

3. <u>PAT and Account Certification</u>. Failure to certify the statement for payment and submit PAT documents five days after the cycle ends will result in the account being suspended.

a. First Offense. Suspend AO account until paid and PAT

requirements are approved by the APC and a letter of warning will be issued.

b. <u>Second Offense</u>. Suspend account until the next billing cycle, account is paid and PAT requirements are approved by the APC. Account will be suspended for up to 14 days.

c. <u>Third Offense</u>. Suspend account for 30 days and request command assistance. This action will be reviewed and the decision will be made by the level IV and the HA.

4. <u>Unauthorized Commitments</u>. An unauthorized commitment is an agreement that is not binding solely because the Government representative who made the obligation lacked the authority to enter into that agreement on behalf of the Government (FAR 1.602). Ordering and acceptance of supplies and services without benefit of a legal contract may incur a personal liability to the individual who made the commitment. CHs shall not use the GCPC to pay unauthorized commitments.

Program Audit Tool

1. <u>Program Audit Tool (PAT)</u>. PAT is a web-based program that contains a set of rules called filters. There are Summary filters and Transaction filters. Summary filters monitor program management activities. Transaction filters monitor purchase card actions. These filters are programmed to flag certain transactions, e.g., split purchases, PayPal, similar vendors, suspicious activity, etc. Each transaction is sent through these filters and every questionable transaction is sent to the AO's Card Management Systems account for review and explanation. The goal of PAT is to make the AO accountable for transactions of interest.

a. PAT will filter transactions up to three business days after the billing cycle ends. AOs have until the fifth working day after the cycle ends to review filtered transactions and forward supporting documents to their APC.

b. Supporting documents are copies of: PAT transaction summary page, PCRF, Vendor's invoice, Purchase Card Log Book, Waivers (if required), a 1348 or accountable document for pilferable items, and a SF 182 for training.

c. During the review AOs are required to answer a series of questions for each filtered transaction. Any attempt to falsify PAT information reviewed or documents submitted to the APC is justification for removal from the GCPC.

2. <u>Access</u>. To access PAT: log in to Citibank, select "CitiDirect Card Management System", and then "SP2".

a. Go to "Reporting"; select "Program Audit Tool" and then
"OK";

b. Ensure the correct cycle that ended on the 19th of the prior month is chosen;

c. Select the "Not Reviewed" transactions and answer the program questions;

d. Review questions; select "Review Complete"; status changes
to "Pending Approval," and

e. For rejected/returned transactions, read the notes, make

the corrections and resubmit.

3. <u>Level III APC (HQMC) Review</u>. The APC RCO-NCR-MCB Quantico will forward all PAT transactions to the Level III for review. The Level III APC may reject and return transactions for additional information/documentation. ACRONYMS

APC	Agency Program Coordinator
AO	Approving Official
APF	Appropriated Funds
CCPMD	Consolidated Card Program Management Division
СН	Card Holder
CMPG	Contract Management Purchasing Guide
DAU	Defense Acquisition University
DoD	Department of Defense
Don	Department of Navy
DoV	Disbursing Official Voucher
FA	Fund Administrator
FAR	Federal Acquisition Regulation
FM	Financial Manager
FOB	Freight on Board
FPI	Federal Prison Industries
НА	Head of Activity
GCPC	Government wide Commercial Purchase Card
GSA	General Services Administration IOP Internal Operating Procedure
JWOD/ABILITY ONE	Industry for the Blind
MCIE	Marine Corps Installations East
MSD	Material Safety Data Sheet
NIB	National Industries for the Blind

NISH	National Industries for the Severely Handicapped
PAT	Program Audit Tool
PCMT	Purchase Card Management Team
RCO Worksheet	Purchase Card Request Form
RUC	Reporting Unit Code
ROG	Receiver of Goods
SOP	Standard Operating Procedure
UNICOR	Federal Prison Industries
USMC	United States Marine Corps



UNITED STATES MARINE CORPS MARINE CORPS INSTALLATIONS NATIONAL CAPITAL REGION MARINE CORPS BASE QUANTICO 3250 CATLIN AVENUE QUANTICO, VIRGINIA 22134 5001

4200 C20

- From: Your section goes here
- To: Agency Program Coordinator, Regional Contracting Office, National Capital Region-Marine Corps Base Quantico
- Subj: NOMINATION LETTER FOR APPOINTMENT AS NEW GOVERNMENT WIDE COMMERICAL PURCHASE CARD APPROVING OFFICIAL (MICRO OR TRAINING & PRINTING)
- Ref: (a) NAVSUPINST 4200.99B (b) AO CitiDirect Desk Guide

1. Per the references (a) and (b), the following information is provided:

NAM	Ξ		RANK	SECTION/BLDG	PHONE NUMBER
EMA	IL:				
Rema	arks	<u>:</u>	will be rep	placing	/Date
2.	Dol	lar Threshold:			
	a.	Micro single	purchase lir	nit:	
	b.	Monthly billi	ng cycle pu	cchase limit:	
				scope of procuren following commod	
	a.		_/ b	/ c	
for the in 1	mis AO his/!	sion essential to exceed 'spa her direct cha	requirement n of control in of commar	ined, requires thes, appointment of L', (7) Cardholde nd. The command usage by their (loes not cause ers, AO will be anticipates that

5. The point of contact for this letter is:

 Rank/Title
 Name

 Phone
 Email

SIGNATURE



UNITED STATES MARINE CORPS MARINE CORPS INSTALLATIONS NATIONAL CAPITAL REGION MARINE CORPS BASE QUANTICO 3250 CATLIN AVENUE QUANTICO, VIRGINIA 22134 5001

4200 C20

Fron To:		Approving Offic: Agency Program (National Capita	Coordinator, F	Regional	Contractin	g Office,
Sub	j:	NOMINATION LETT COMMERCIAL PURC				
Ref:	:	(a) DON EBUSOPS(b) AO CitiDire			4.0	
1.	Per	references (a)	and (b), the	followin	ng informat	ion is provided:
NAME	<u>2</u>	RAN	K SECTION,	/BLDG	EXTENSION	
EMAI	[L:					
		: CH will be re				ate
2.	a.	lar Threshold: Micro single pu Monthly billing			: \$	
3.		e cardholder scop lowing commodit:		nent will	. range fro	m the
	a.		b.			
	c.		d.			
4.	Per	reference (b),	I hereby affi	Irm the f	ollowing:	
	a.	The nominee has	s been properl	ly traine	ed	
	b.	The purchase ca requirements or	-	ed for mi	ssion esse.	ntial
	с.	This appointment control	nt does not ca	ause the	AO to exce	ed 'span of
	d.	The cardholder	's AO will be	in his d	lirect chai	n of command
	e.	The command ant card usage	ticipates the	cardhold	ler will re	quire regular
5.	Tł	ne point of con	ntact for thi	s lette	r is:	
		ank/Title		Name Email		

RCO-NCR PURCHASE CARD REQUST FORM- Form Revised FY 16

PLEASE ENSURE THAT YOU INCLUDE YOUR PR BUILDER DOCUMENT WITH RCO WORKSHEET WITH FILES AND SEND WITH REQUESTED MONTHLY PAT AUDIT PAPERWORK.

		-				
Requester's Name:	CH NAME:	Document #:			DATE	
Department & Section:			EM	ERGE		ROUTINE
Type of order:	Phone Over-the-counter		ther			
						Total
	non) For RCO-NCR PURCHASE CARD REQUEST For	n (attaoh	QTY	U/I	Unit	
additional sheets as needed):					Price \$	Price \$
Justification for request (attach a	additional sheets as needed):	•				
Vendor Name / Address	/ Telephone # / Contact Person	Deliver to: CM	D/Unit/	Name	/ addres	s/Tel#
Mandatory course Screening * M	ust oheok ALL** You must provide a soreen shot from	mandatory source If	not availab	IN NOT	Eŝ	
ABILITY ONE	http://www.ability one.org		Yes			
	Serv Mart/on line Serv Mart/Dod E Mall	-	Yes			
GSA Advantage	http://www.gsa.gov		Yes			
Printing DAPS	http://www.daps.dla.mil		Yes			
ServMart	Base Store on MCM Command		Yes			
DOD E MALL	https://email6.prod.dodonline.net.main		Yes			
TRAINING- please confirm	COMMERCIAL OFF THE SHELF- MUST INCLUDE A SF 182					
	e prohibited list' CHECK LISTINGS BEFORE PURCHA		Yes	_		
 Will this purchase result 	•		Ye			
	for the same type of purchase?		Yes _			
4. Is this a Hazardous Ma		ubmit all requisitio				
		Yes No c			AVER	
Is this an IT Equipment		h written approva		-6		
Is this accountable pro	perty or a "pilferable" item ?	Yes	No		\$300.00	up to-\$5K or
If yes, item must be record	ded in accountable property log	Yes No			pilferable	items
	endor takes the Govt Credit Card before		O	rder in	formatio	DATE
	fees can be charged Y					
	udes ALL shipping charges 🗌 Y		Dat	e Ordered	<u> </u>	
Fill or Kill (NO BACK O	RDERS) 🗆 Y	es 🗆 No				
Third Party Card processo	r prohibited(i.e. PayPal) 🗌 Y	es No	Est	timated D	elivery Date	
Charges cannot be process	ed prior to delivery 🗆 Y	es 🗆 No				
	n digitally sign form. After signing save to folder or desidop			DATE	RECEIVED	
	riment in the routing of the form. 1-FA/2- AO/3rd CH/4-FA If					
in e mail a cend to next percon/depa	cherching of the form. 1-PA2-Abrard Creat An	funds are exceeded.				
in e mail a cend to next personalepa		funds are exceeded.				
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FA APPROVED by	nt name, title and sign	funds are exceeded. Date		ual Cost		
FA APPROVED by			e		OVAL FOR A	
FA APPROVED by			e	RE-APPR	OVAL FOR A	DOITIONAL COST
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MARINE CORPS ACQUISITION PROCEDURES SUPPLEMENT-APPENDIX H

Attachment E

			PURCHASE CARD LOG					
								Additional Comments
Cardholder Name								
Unit								Disputed Problem
Cycle Limit								Purchases Awaiting
								Credit Incorrect
								Billing Duplicate
					BULK FUND		Name of	billing Item
Date of Purchase					Account	Date Received	Person	Returned
(MM/DD/YR)	Document Number	Item Description/Nomenclature	Merchant	Total Price	Balance	(MM/DD/YR)	Receiving	

COMMERCIAL ITEM DETERMINATION PER FAR 2.101 CHECKLIST

SUPPLIES

- 1. Is this item of a type customarily used by the general public or non-government entities for other than government purposes? Yes _____ No _____ If yes, describe the item and its intended purposes.
 - a. Has this item been sold, leased or licensed to the general public? Yes _____ No ____ If yes, identify one or more such sale, lease or license to document the commerciality of the item. [*This is a commercial supply item. You may stop now and put your commercial item determination/ documentation in the file.*]
 - b. If no, has this item been OFFERED for sale, lease or license to general public? Yes _____ No ____ If yes, identify one or more such offered sale/lease/license to document the commerciality of the item. [*This is a commercial supply item. You may stop now and put your commercial item determination/ documentation in the file.*]
- 2. If answer to item 1 is "NO", has this item EVOLVED from such an item through advances in technology or performance that is not yet available in the commercial marketplace but WILL be available in the commercial marketplace in time to meet government requirements? Yes No If yes, describe the original item, how it has evolved and when it is anticipated to be available in the commercial marketplace. [*This is a commercial supply item. You may stop now and put your commercial item determination/ documentation in the file.*]
- 3. If answer to item 1 and 2 are "NO," does it meet the criteria for item 1 or 2 except for modifications? Yes _____ No _____ If yes:
 - **a.** Is the modification a type customarily available in the commercial marketplace? Yes _____ No _____ If yes, describe the commercial item and the type of modification and give examples of how it is available in the commercial marketplace. [*This is a commercial supply item. You may stop now and put your commercial item determination/ documentation in the file.*]
 - b. If 3a is "NO", is it a MINOR MODIFICATION, one that does not significantly alter the nongovernmental functions, change the essential physical characteristics or change the purpose of the process? Yes _____ No _____ If yes, describe the extent of the modification and how it complies with this criteria. One factor to consider is value/size of the modification in comparison to the value/size of the original (commercial) item. [*This is a commercial supply item. You may stop now and put your commercial item determination/ documentation in the file.*]
- **4.** Is this any combination of items meeting the requirements of 1, 2 and 3 above that are of a type customarily combined and sold in combination to the general public? Yes _____ No ____ If yes, describe similar commercial instances. [*If you meet criteria for 1, 2 or 3 and 4, this is a commercial supply item. You may stop now and put your commercial item determination/documentation in the file.]*

SERVICES

5. <u>Services in Support of a Commercial Item</u>: Is this for installation, maintenance, repair, training or other services of a commercial product? Yes <u>No</u>

- **a.** If yes, are the services in support of commercial items defined as commercial in the Supplies Checklist (Section A) above? Yes _____ No _____ If yes, describe how the items were determined to be commercial and the services to be provided in support of the commercial item and continue.
- **b.** Does this company provide similar services contemporaneously to the general public under terms and conditions similar to those we are getting? Yes _____ No ____ If yes, give examples or describe how you verified this. [*If 5a and 5b are BOTH yes, this service is a commercial item. You may stop now and put your commercial services determination/documentation in the file.*]
- 6. <u>Standalone Commercial Services</u>: If either 5a or 5b is "NO", is this a service of a type offered and sold competitively in substantial quantities in the commercial marketplace BASED ON ESTABLISED CATALOG OR MARKET PRICES FOR SPECIFIC TASKS PERFORMED OR SPECIFIC OUTCOMES TO BE ACHIEVED using standard commercial terms and conditions? Yes _____ No ____ [*If no, this is not a commercial item and do not use FAR Part 12 procedures.*]

If yes, describe the specific tasks/outcomes to be achieved and, in accordance with Paragraph a. or b. below, document how the service is sold and priced (e.g. catalog or market price) as well as how you confirmed the information. [*This will constitute your commercial services determination for the file*.]

- **a.** <u>Catalog-Priced Services:</u> "Catalog price" means a price included in a catalog, price list, schedule, or other form that is regularly maintained by the manufacturer or vendor, is either published or otherwise available for inspection by customers, and states prices at which sales are currently, or were last, made to a significant number of buyers constituting the general public. Include relevant information gleaned from your market research to document your validation of the catalog price:
 - **i.** Attach a copy of or identify the catalog and its date or the appropriate pages for the offered service tasks/outcomes. Include a description of the current discount policies and of the price lists (are they published or unpublished, available for inspection by customers, and do they state prices at which sales are currently or last made); and
 - **ii.** Explain the basis of each commercial service item price in the Government estimate and its relationship to the established catalog price, including how the commercial price relates to the price of recent sales in quantities similar to the proposed quantities sought by the Government.
- **b.** <u>Market-Priced Items</u>: "Market prices" means current prices that are established in the course of ordinary trade between buyers and sellers free to bargain and that can be substantiated through competition or from sources independent of the offerors. Include relevant information gleaned from your market research to document your validation of the market price:
 - i. Provide the source and date or period of the market quotation or other basis for the commercial market price, the base amount, and applicable discounts that may be expected; and
 - **ii.** Describe the nature of the market. For example, will the instant procurement establish the market price through competition? If so, describe the extent of the competition expected.

NOTE: An item or combination of items from 1-6 above transferred between or among separate divisions of a contractor or non-developmental items sold in substantial quantities competitively to multiple state or local governments may also be considered commercial items.