



REPLY TO  
ATTENTION OF

SAAL-PI

DEPARTMENT OF THE ARMY  
OFFICE OF THE ASSISTANT SECRETARY OF THE ARMY  
ACQUISITION LOGISTICS AND TECHNOLOGY  
103 ARMY PENTAGON  
WASHINGTON DC 20310-0103



August 1, 2000

MEMORANDUM FOR ASSISTANT SECRETARY OF THE ARMY (ACQUISITION,  
LOGISTICS AND TECHNOLOGY)  
ASSISTANT SECRETARY OF THE NAVY (RESEARCH,  
DEVELOPMENT AND ACQUISITION)  
ASSISTANT SECRETARY OF THE AIR FORCE  
(ACQUISITION)  
DIRECTORS, DEFENSE AGENCIES

SUBJECT: Certification of Purchase Card Payment Invoices

The purpose of this memorandum is to ask your support in ensuring only properly authorized individuals certify purchase card invoices for payment.

The Department of Defense, in conjunction with the two purchase card issuing banks, is currently implementing its web-based, electronic review, approval and certification process for purchase card invoices. Under this process, paying offices will pay on receipt of electronically-certified invoices. The payment office will generally assume that the electronic certification was made by a properly appointed certifying official.

It is incumbent upon the Military Departments and Defense Agencies to ensure that payment invoices are electronically certified only by authorized, duly appointed certifying officers. Each certifying officer must be appointed in accordance with the provisions of Volume 5, Chapter 33 of the DoD Financial Management Regulation (FMR), "Accountable Officials and Certifying Officers." Certifying officers are pecuniary liable for erroneous payments resulting from the performance of their duties in accordance with Title 31, United States Code, section 3528.

Purchase Card Agency Program Coordinators (APCs) are required to conduct annual compliance reviews of program officials under their cognizance. These compliance reviews must include a review of documentation supporting the appointment of billing or other officials as certifying officials. Additionally, APCs shall not issue passwords to allow individuals to certify invoices until such time as they ensure availability of certification appointment documentation. I also recommend that all pre and post payment random reviews of certifying officer payments by reviewing officials (Section 3308 of the cited FMR) include a review of applicable certifying officer appointment documentation.

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The integrity of the purchase card program is in large measure predicated on the validity of the certifying officer payment certification process. The use of certifying officers and the inherent underlying personal liability of these officials is one of the Department's lynch-pins in the system of internal controls that have been put into place to manage the risk of fraud occurrences in the purchase card program. Unless these program officials are appropriately appointed in writing by authorized Departmental personnel, and are held accountable, the confidence of the Congress and the American taxpayer in our system of internal controls would be at question.

If you have any questions or require additional information, please do not hesitate to contact me at (703) 681-7564.



Bruce E. Sullivan  
Director, Purchase Card Joint  
Program Management Office

CF:  
Under Secretary of Defense (Acquisition & Technology)  
Under Secretary of Defense (Comptroller)  
Assistant Secretary of the Army (Financial Management & Comptroller)  
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