



U.S. General Services Administration

# **U.S. General Services Administration. Federal Acquisition Service.**

**DOD GPC Policies & Directives  
Denise Reich  
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OSD / OUSD (AT&L) / DPAP / PDI**

**2014**

# Course Description

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- This session provides an overview of topical issues related to DoD policies, procedures and directives.

# Acronyms

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EDA	Electronic Document Access <a href="http://eda.ogden.disa.mil/">http://eda.ogden.disa.mil/</a>
FMR	DoD Financial Management Regulations
FPDS-NG	Federal Procurement Data System <a href="https://www.fpds.gov/fpdsng_cms/index.php/en/">https://www.fpds.gov/fpdsng_cms/index.php/en/</a>
GAO	Government Accountability Office
GPC	Governmentwide Commercial Purchase Card
Guidebook	DoD Charge Card Guidebook for Establishing & Managing Purchase, Travel & Fuel Card Programs to be released April 2014
SAM	System for Award Management <a href="https://www.sam.gov/portal/public/SAM/#1">https://www.sam.gov/portal/public/SAM/#1</a>
SF-182	Authorization, Agreement & Certification of Training Form
Ts&Cs	Terms and Conditions
WAWF	Wide Area Workflow

# Agenda

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1. Recent Policy Releases
2. GPC Procurement Authority DFARS Case
3. DD Form 577
4. WAWF & GPC
5. Terms and Conditions
6. FAR Part 8 Changes, AT&L Class Deviation & Other Acquisition Priorities
7. GPC Expanded Uses Draft DFARS Case

# Recent Policy Releases

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- **Updated** Department of Defense Government Charge Card Guidebook for Establishing and Managing Purchase, Travel, and Fuel Card Programs released 30 May 2014

[http://www.acq.osd.mil/dpap/pdi/pc/policy\\_documents.html](http://www.acq.osd.mil/dpap/pdi/pc/policy_documents.html)

Many of the updates were incorporated to fulfill transparency requirements (e.g., reporting & retention), increase regulatory compliance, support clean audit initiatives, etc.

# FPDS Contract Reporting

## DFARS PGI 204.6

(5) Reporting task and delivery orders where the Governmentwide commercial purchase card is **both the method of purchase and payment.**

(i) **Do not report open-market purchases** (i.e., not under a Federal Supply schedule, agreement, or contract) made with the Governmentwide commercial purchase card valued less than the micropurchase threshold to FPDS.

(ii) Purchases made using the Governmentwide purchase card as the method of both purchase and payment under federal schedules, agreements, or contracts are **required to be reported to FPDS regardless of value.** Contracting offices shall ensure all such purchases made by their authorized cardholders are reported to FPDS **no less frequently than monthly. Any individual purchase valued greater than \$25,000 must be reported individually to FPDS.** For individual purchases valued less than \$25,000, there are three acceptable methods for reporting to FPDS. They are, in preferred order of use:

(A) Report each order individually to FPDS;

(B) Report a consolidated express report to FPDS using the delivery order or BPA call format that references the individual contract or BPA, respectively; or

(C) Report a consolidated express report to FPDS using the purchase order format that uses the generic DUNS 136721250 for 'GPC Consolidated Reporting' or 136721292 for 'GPC Foreign Contractor Consolidated Reporting', as appropriate, as the identifier. Note that when a generic DUNS number is used to report these actions, only 'Other than Small Business' is allowed as the 'Contracting Officer's Determination of Business Size' selection.

When the GPC is used solely as a method of payment method against a contract, report the action as any other individual contract action report.

Mark 'Purchase Card as Payment Method' as 'Yes'.

# Recent Policy Release

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- OUSD(AT&L) Memo, Improving FPDS Reporting of 18 April 2014
  - All task and delivery orders and calls placed under federal government issued contracts and agreements are required to be reported to FPDS regardless of dollar value, notwithstanding the method used to place the order. **These orders are accomplished using FAR part 8 and/or 16 procedures and are not considered micro-purchases even if the value is less than the micro-purchase threshold as defined in FAR Part 2.** See PGI 4.606(5).
  - Purchase Orders accomplished using FAR part 13 procedures, where there is no underlying federal contract... valued less than or equal to them MPT as defined in FAR part 2 for non-contingency operations are not required to be reported... **In the case of awards that are awarded and performed, or purchase is made, outside the US, the actions must be individually reported if they are valued at \$25K or more (rather than the MPT of \$30K in FAR part 2) in order to comply with the Federal Funding Accountability and Transparency Act.**

Incorporated in Guidebook A.1.6.1 – Reporting to the FPDS-NG

# **GPC PROCUREMENT AUTHORITY**

# Procurement Authority

DARC Agreed version of 27 June 14

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## **Modify DFARS 202.101 PGI to add definition:**

- “Governmentwide commercial purchase card program” means an element of a contracting activity responsible for authorization, issuance, maintenance and oversight of Governmentwide commercial purchase card accounts issued in accordance with task orders placed against the GSA SmartPay Program master contract. These elements have been delegated procurement authority through a contracting activity identified above. See 213.301 for guidance on the delegation of procurement authority and the associated oversight of Governmentwide commercial purchase card programs.

# Procurement Authority

DARC Agreed version of 27 June 14

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## **Modify DFARS 213.301 to add:**

- Governmentwide commercial purchase card programs require procurement authority to operate and cannot be established or operated unless procurement authority is granted in accordance with governing laws and regulations, and delegated through a contracting activity identified at DFARS 202.101. Guidance regarding establishment and oversight of Governmentwide commercial purchase card programs can be found in the “Department of Defense Government Charge Card Guidebook for Establishing and Managing Purchase, Travel, and Fuel Card Programs” at [http://www.acq.osd.mil/dpap/pdi/pc/policy\\_documents.html](http://www.acq.osd.mil/dpap/pdi/pc/policy_documents.html).]

# Procurement Authority

## Guidebook A.1.1.1

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- Provides implementing guidance for DFARS PGI Subpart 202.101
- Requesting components must find a DFARS-designated contracting activity that is willing and authorized to act as the servicing agency
  - Inter-Service/Agency support agreement detailing responsibilities of each party must be executed
  - All servicing agency instructions, policies, and guidance are applicable to the requesting agency
  - The servicing agency must perform the required program oversight of all GPC accounts under its cognizance

**DD FORM 577**  
**APPOINTMENT TERMINATION RECORD**  
**– AUTHORIZED SIGNATURE**

# DD Form 577

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- **FMR Vol. 5, Ch. 33 of Feb 2014** - Requires DoD ID # in Block 7 instead of the employees SSN
  - No more Personally Identifying Information (PII) requiring special storage
  - DoD ID # found on the reverse of the CAC or in each person's PKI e-signature
- **Guidebook A.1.1.3** - All Certifying Officers and DAOs shall be appointed and terminated using the DD Form 577. In addition to GPC Certifying Officer appointments, this means that all A/BOs and CHs, in their capacity as DAOs, shall be appointed and terminated via the DD Form 577.
  - A/OPC 577 appointment requirement removed

DD Form 577, July 2014 Version Available at:  
<http://www.dtic.mil/whs/directives/infomgt/forms/efoms/dd0577.pdf>

# DD 577 Automation Initiative

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- Modify PCOLS workflow to automate DD 577 initiation, routing, approval and retention
  - May require new Roles for 577 Appointing Authority (Certifying Officer and DAO)
  - May include minimum standards for blocks 14 (Responsibilities) and 15 (Regulations) and text field for agency specific language
  - Intended to replace hard copy for EDI-enabled accounts. Non-EDI accounts will continue to require “manually-signed signature”

# DoDFMR Vol 5, Chapter 33

## Feb 2014

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### 330401. Appointment and Termination

F. Certifying officers who certify manual vouchers or submit manual certifications of electronic payments must submit original, manually-signed DD 577s (see subparagraph 330402.A.1).

- 330402 A.1 Payments Certified to DFAS DOs.

Send the form to the DFAS-IN DO (secure e-mail [dfas-incddd577@dfas.mil](mailto:dfas-incddd577@dfas.mil)) following that office's guidance. Forms sent as attachments to secure e-mails must be copies of original DD 577s, not "copies of copies."

# **WIDE AREA WORK FLOW (WAWF) & GPC**

# GPC Contract Pay & WAWF

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- **FAR 32.905 Payment documentation and process** -

(a) *General*. Payment will be based on receipt of a proper invoice and satisfactory contract performance...

(c) *Authorization to pay*. All invoice payments, ...with the exception of interim payments on cost-reimbursement contracts for services, must be supported by a **receiving report** or other Government documentation authorizing payment (e.g., Government certified voucher).

- **DFARS** - When the GPC is used as a **contract payment vehicle**, the vendor shall use WAWF to create and submit the **receiving report**.

- DFARS 232.7002 ,Policy; 232.7003, Procedures; & 252.232-7003, Electronic Submission of Payment Requests and Receiving Reports

FAR 32.905 Implements Prompt Payment Act Requirement for Written Acceptance

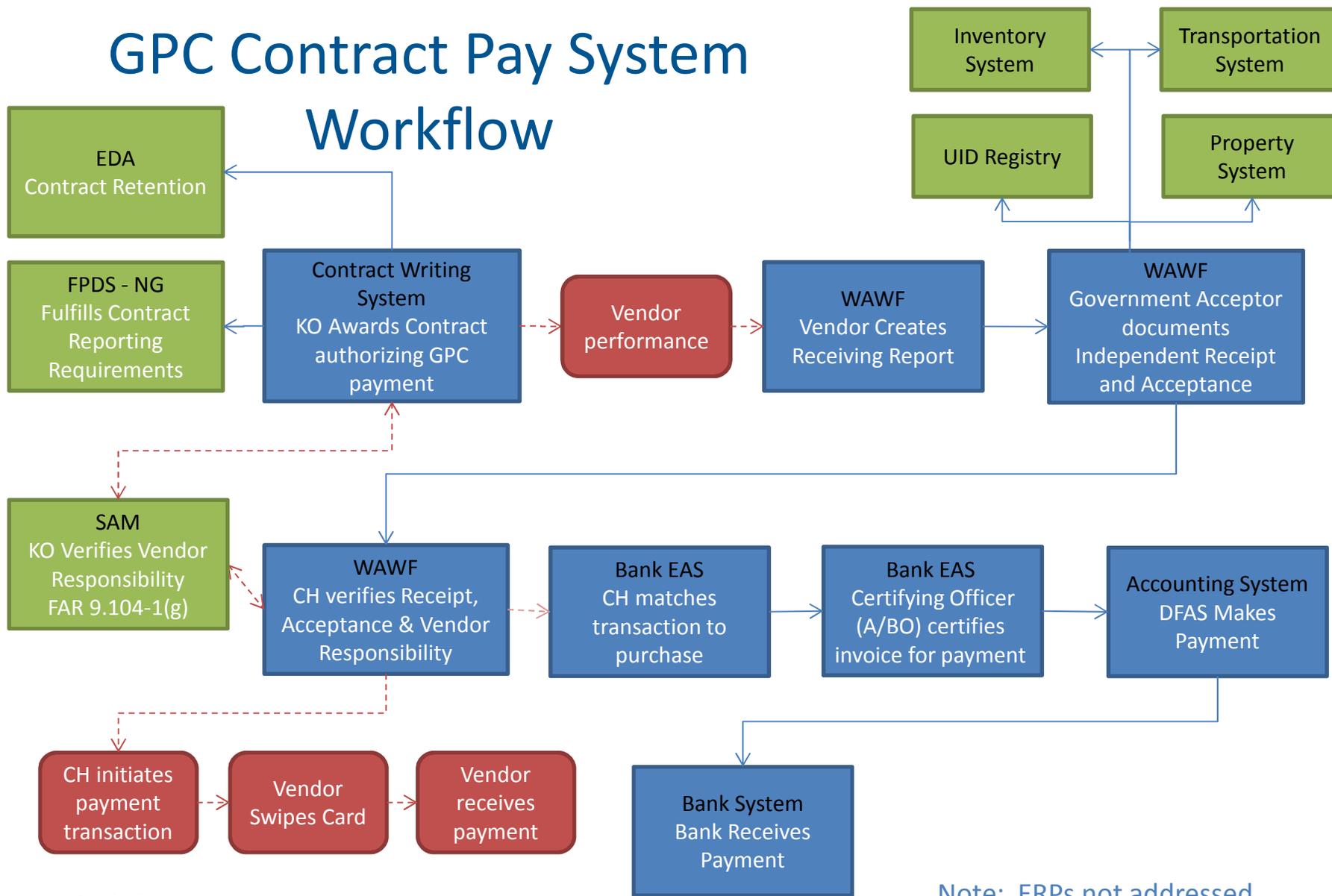
# GPC Contract Pay & WAWF

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- **Guidebook A.4.4.1** – Use of WAWF to create and accept receiving reports is mandatory when the GPC is used as a method of payment against a contract. In order to ensure proper routing of contract transactions paid with the GPC, use the code “CRCARD” in the Pay Official/DoDAAC field.
  - The contractor is required to generate the receiving report in WAWF.
  - The government acceptor is required to accept the receiving report in WAWF.
  - The CH is required to verify acceptance has occurred in WAWF prior to submitting the invoice to the certifying officer (usually the A/BO) for certification. See [DFARS Subpart 232.7002\(a\)\(1\) and \(2\)](#).

# GPC Contract Pay System

## Workflow



Logical Flow - - - - ->  
 System Flow —————>

Note: ERPs not addressed

# GPC Contract Pay & WAWF

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- Use of WAWF to create and accept the receiving report for GPC micro-purchases that result in delivery of accountable property is encouraged but not mandatory. Use of WAWF for GPC accountable property micro-purchases is encouraged for the following reasons:
  - Record of receipt is electronically captured and stored
  - Once accountable property has been delivered, property systems are electronically updated, ensuring proper accounting and tracking of government assets and increasing transparency and auditability
  - The UID Registry is updated (if required)
  - Risk of improper or fraudulent purchases is reduced
  - Paperless processing is enabled among geographically dispersed program participants

GAO Audit (GAO-08-333) identified lack of property accountability for items bought with the GPC as a program weaknesses and recommended actions be taken to improve traceability of property.

# What is Accountable Property?

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- Items acquired with the GPC with a unit cost of \$5,000 or greater are considered accountable property (in accordance with the provisions of DoDI 5000.64)
- Includes pilferable property, as defined in the cited DoDI, regardless of unit acquisition cost
- Ensure ALL accountable property is independently received and accepted by separate DoD officials and that these items are properly recorded in DoD property book systems

See Guidebook A.4.3 and  
Follow Component Procedures

# What is Independent Receipt and Acceptance?

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## Guidebook A.4.4

Mandatory: Written independent receipt and acceptance is required for (1) purchases of accountable property, (2) transactions where the GPC is used as a method of payment, (3) self-initiated CH purchases (i.e., purchases lacking a documented requisition/request from someone other than the CH), and (4) other specific circumstances for which Components elect to require independent receipt and acceptance.

With respect to accountable property and self-initiated purchases, a Government employee other than the CH is required to accept the good or service to ensure the Government received what is stated on the invoice. To verify proof of delivery, the employee shall affix a legible signature and date to the invoice, packing slip, or other document listing the items that were ordered, billed, and received. To ensure proper identity, the employee shall print or type his/her name and affix signature. This individual shall forward documentation supporting the purchase and independent receipt and acceptance to the A/BO.

A/BOs shall include a verification of required proof of delivery documentation in their monthly review and certification of billing statements.

**Follow Component Procedures**

# TERMS AND CONDITIONS

# Terms & Conditions

## On-going Policy Initiative



- **ISSUE**: Is there a regulatory basis to support delegation of procurement authority to non-contracting trained employees (i.e., CHs) to enter into agreements that include Ts & Cs?
  - Is that practice prudent? Necessary? Prevalent?
  - What additional guidance would be necessary?
  - What controls would be necessary to ensure compliance with applicable acquisition regulations and policies?
    - Training, qualifications & experience standards exist for individuals awarding or administering contracts above the SAT (See DFARS 201.603-2). Not for below MPT or between MPT and SAT.
  - Is special consideration necessary to accommodate “standard commercial” Ts & Cs or “specification” of the requirement within the commercially offered service?
    - Online shopping and click here to accept Vendor Ts &Cs to proceed?
    - A vendor sells 10 foot wooden posts cut to any size for \$20/post. Can the GPC be used to buy 3 wooden 9 ft. wooden posts for \$60?

# Terms & Conditions

## On-going Policy Initiative

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- DoD Component Ts & Cs policies vary.
- Recent **DRAFT** DoD Charge Card Guidebook included the following language clearly prohibiting the practice.  
**Language excluded from 30 May release.**

A.3.8 Cardholder and Convenience Check Account Holder Roles and Responsibilities - (s) Mandatory: CHs shall not execute contracts with vendors. If the vendor requires specific contractual terms and conditions, the requirement must be placed on a Government contract, to be signed by a warranted Contracting Officer. This applies to all GPC micro-purchases.

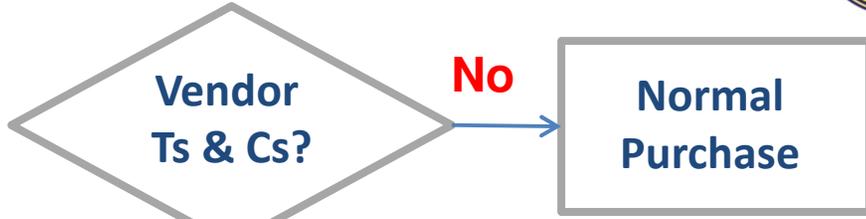
Only Contracting Officers have the authority to sign to bind the Government. If someone other than a Contracting Officer attempts to bind the Government by signing merchant Terms/Conditions, then they are considered "personally" liable for any violations of the Terms and Conditions.

# Cardholder Steps For Vendor Ts&Cs

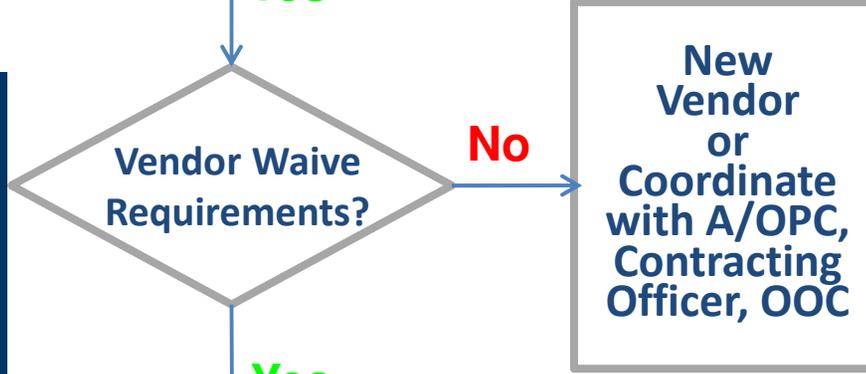


I'll show your Ts&Cs to our Contracting Officer.

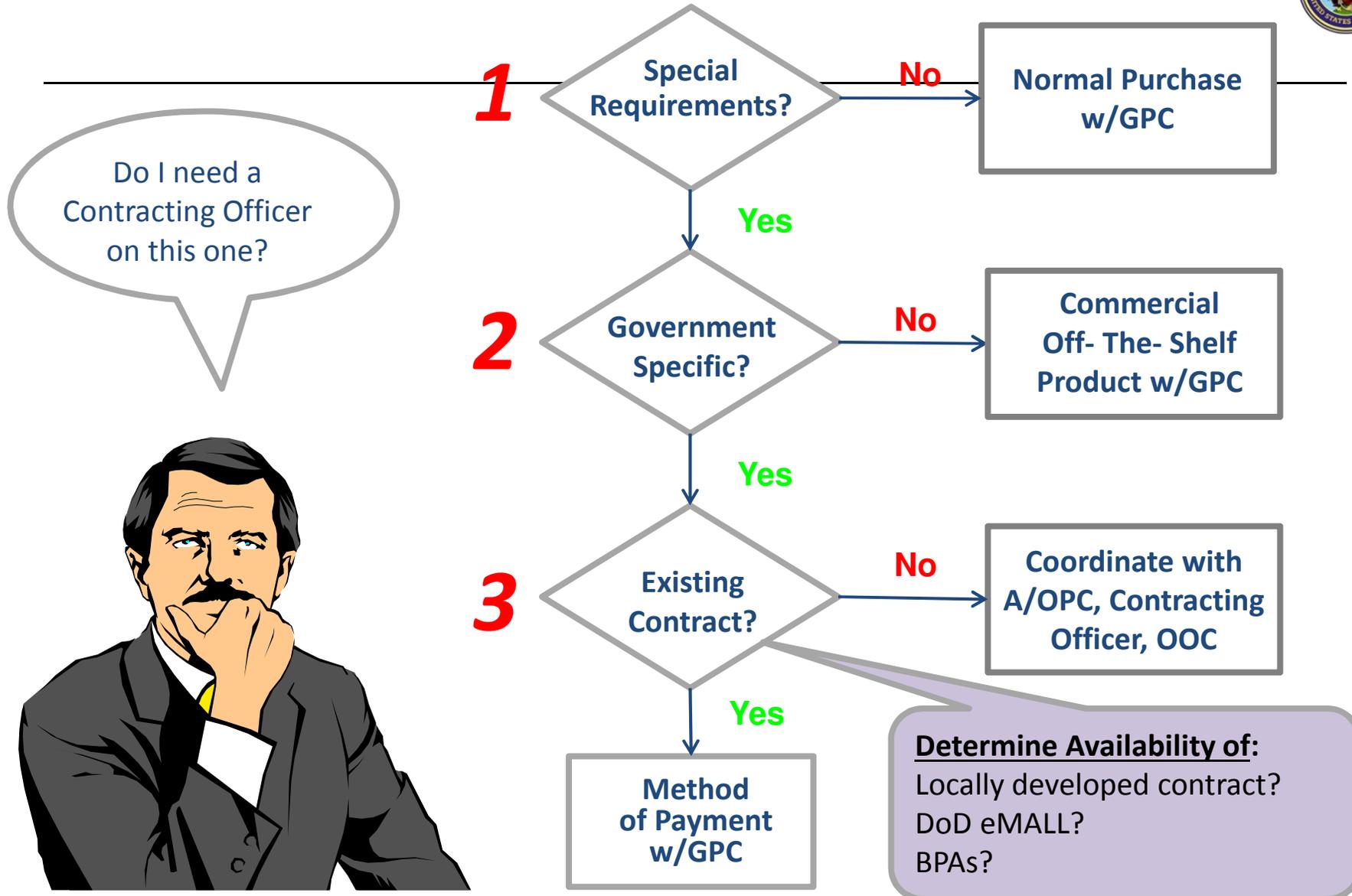
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# Cardholder Decision Process Government Ts & Cs



**FAR PART 8 CHANGES, AT&L CLASS  
DEVIATION & OTHER ACQUISITION  
PRIORITIES**

# FAR 8.002 Change

Priorities for Use of Mandatory Government Sources

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## Removed

- Mandatory Federal Supply Schedules (See subpart 8.4);
- Optional Use Federal Supply Schedules (See subpart 8.4); and
- Federal Prison Industries, Inc. (See subpart 8.6), or commercial sources (including educational and non-profit institutions).

Reference Federal Acquisition Circular 2005-72 (December 31, 2013)  
FAR Case 2009-024. (Effective: January 30, 2014)

# FAR 8.004 - Use of Other Sources

## Summary

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### Added:

If not using mandatory sources, encouraged to consider using non-mandatory sources listed in paragraph (a) (not listed in any order of priority) before considering the non-mandatory source listed in paragraph (b).

(a)(1) Supplies. FSS, GWAC, MACs, and any other procurement instruments intended for use by multiple agencies, including BPAs under FSS contracts (e.g., FSSI agreements).

(a)(2) Services. Agencies are encouraged to consider Federal Prison Industries, Inc., as well as the sources listed.

(b) Commercial sources (including educational and non-profit institutions) in the open market.

# FAR 8.004 - Use of Other Sources

## Full Text

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- If an agency is unable to satisfy requirements for supplies and services from the mandatory sources listed in [8.002](#) and [8.003](#), agencies are **encouraged to consider** satisfying requirements from or through the **non-mandatory sources listed in paragraph (a)** of this section (not listed in any order of priority) **before considering the non-mandatory source listed in paragraph (b)** of this section. When satisfying requirements from non-mandatory sources, see [7.105\(b\)](#) and [part 19](#) regarding consideration of small business, veteran-owned small business, service-disabled veteran-owned small business, HUBZone small business, small disadvantaged business (including 8(a) participants), and women-owned small business concerns.
- (a)(1) *Supplies*. Federal Supply Schedules, Governmentwide acquisition contracts, multi-agency contracts, and any other procurement instruments intended for use by multiple agencies, including blanket purchase agreements (BPAs) under Federal Supply Schedule contracts (e.g., Federal Strategic Sourcing Initiative (FSSI) agreements accessible at <http://www.gsa.gov/fssi> (see also 5.601)).
- (a) (2) *Services*. Agencies are encouraged to consider Federal Prison Industries, Inc., as well as the sources listed in paragraph (a)(1) of this section (see subpart 8.6).
- (b) Commercial sources (including educational and non-profit institutions) in the open market.

# AT&L Class Deviation

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- GSA has determine the prices of supplies and fixed-price services, and rates for services offered at hourly rates , to be fair and reasonable for the purpose of establishing the schedule contract. GSA's determination does not relieve the ordering activity contracting officer from the responsibility of making a determination of fair and reasonable pricing for the individual orders, BPAs and orders under BPAs.

Reference 13 March 2014 AT&L Memo Subj: Class Deviation—Determination of Fair and Reasonable Prices When Using Federal Supply Schedule Contracts

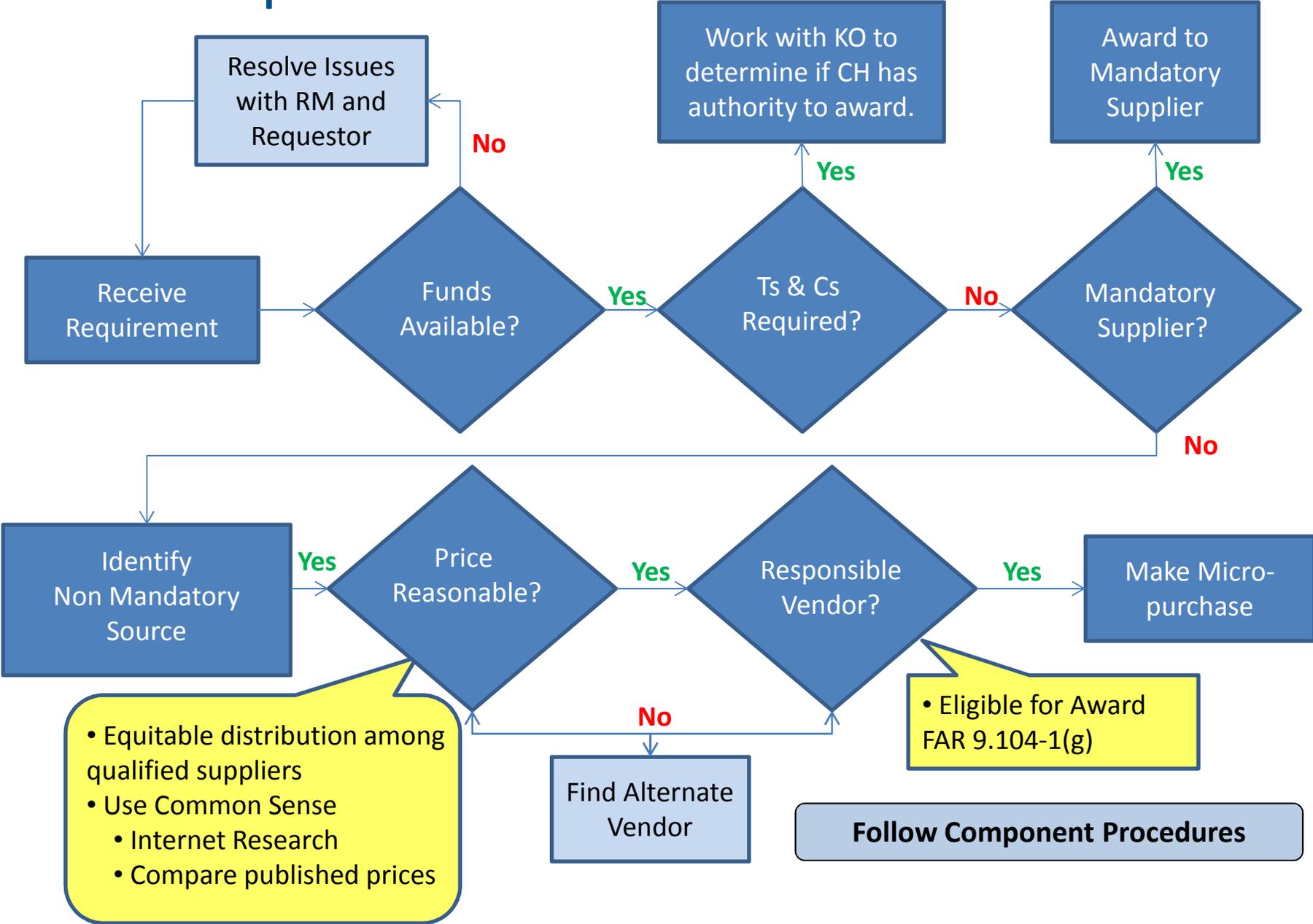
# GPC Implications

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- CHs continue to be required to follow FAR 8.002 and 8.004
  - DoD-level Policy does include a documentation mandate
- FAR 13.203 - Determine price reasonableness if the CH:
  - suspects the price is not reasonable
  - Is purchasing a supply or service for which no comparable pricing information is readily available (e.g., a supply or service that is not the same as, or is not similar to, other supplies or services that have recently been purchased on a competitive basis).
- CHs placing individual orders against FSS are conducting contract actions, even when below the MPT
  - FPDS reporting and EDA retention requirements apply

Follow Component Procedures

# Micro-purchases



# Component Procedures Must Balance Acquisition Priorities

Mission Needs



- Vendor Responsibility Determinations
- Price Reasonableness Determinations
- Strategic Sourcing
- Utilization of Small Business & other concerns
- EDA / FPDS Reporting
- Sustainable / Green Procurement

Follow Component Procedures

# EXPANDED USE GPC **DRAFT** DFARS CASE

# GPC Account Uses

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- Micro-purchase
- Convenience Check
- Contract Pay
- Ordering Officer
- SF-182 Payment
- ~~Inter / Intra Governmental~~

# Micro-purchase

## GPC Account Uses

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- Micro-purchase - Acquisition of supplies or services, the aggregate amount of which does not exceed the micro-purchase threshold -- \$3,000 except:
  - Davis Bacon Act (construction) -- \$2,000
  - Service Contract Act (Services) -- \$2,500; and
  - Contingency/nuclear, biological, chemical or radiological attack as described in [13.201\(g\) \(1\)](#), except for construction subject to the Davis-Bacon Act (41 U.S.C. 428a)–
    - \$15,000 for contracts awarded and performed, or purchase to be made, inside the United States
    - \$30,000 for contracts awarded and performed, or purchase to be made outside the United States
  - Follow Agency Procedures for [FPDS reporting](#)

# Convenience Check

## GPC Account Uses

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- Convenience Check Accounts – Follow Micro-purchase thresholds for Supplies
  - Shall not be:
    - written to vendors who accept the purchase card
    - written for recurring payments
    - issued for employee reimbursements, cash advances, cash awards, travel-related transportation payments, or meals
  - **Follow Agency Procedures for 1099 reporting**
  - Include with micro-purchases for **FPDS reporting**

# FAR 13.301(b) – GPC

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- Agency procedures should not limit the use of the Governmentwide commercial purchase card to micro-purchases. Agency procedures should encourage use of the card in greater dollar amounts **by contracting officers** to place orders and to pay for purchases against contracts established under Part 8 procedures, when authorized; and to place orders and/or make payment under other contractual instruments, when agreed to by the contractor.

# Contract Pay

## Draft DFARS Case

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- Specifically authorize GPC use to make contract payments if the contractor agrees to accept GPC payment and the prescribed contract Ts & Cs are included in the basic contract.
- Clarify the authorizing language to state the necessary training, experience & qualifications of individual CHs delegated authority to conduct contract payment transactions.
- Contract Payment Cards
  - Ensure contract clauses included that authorize GPC as payment method.
  - Ensure proper oversight by KO.
  - Follow Agency procedures for FPDS reporting.

# Ordering Officer

## Draft DFARS Case

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- Grants OO authority to place orders up to the Simplified Acquisition Threshold (\$150K)
- Grants OO authority to place orders against fixed price Indefinite Delivery/Indefinite Quantity (ID/IQ), Requirements, Time and Material or Labor Hour Contract or Blanket Purchase Agreements (BPAs)
- Prohibits OO from making any commitments or changes to the established basic contract provisions that affect contract price, quality, quantity, delivery, or other terms and conditions
- Clarify the authorizing language to state the necessary training, experience & qualifications of individual CHs delegated authority to place orders

# SF 182

## Draft DFARS Case

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- Specifically authorize GPC use to make payment against an approved Authorization, Agreement and Certification of Training (SF 182) [or alternate equivalent electronic authorization system] in lieu of an employee reimbursement up to \$25,000.
  - 5 U.S.C. 4109 authorizes the head of an agency, under the regulations prescribed under section 4118(a)(8) of that title, to reimburse employees for necessary training expenses. These actions are not FAR-based acquisitions.
- Clarify the authorizing language to state the necessary training, experience & qualifications of individual CHs delegated authority to make SF 182 payments.
- States any training event that requires tailoring or tailored training materials, or with a price exceeding \$25,000, must be acquired by a warranted contracting officer in accordance with all applicable acquisition regulations, policy, guidance and procedures.
- Not Reported to FPDS.

**Additional guidance in DoDI 1400.25, Vol 410 dated 25 Sep 2013**

# SF 182 Training Request Payments

## Guidebook A.1.3

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- **Mandatory: The GPC shall be the method of payment for all commercial training requests using the SF 182, valued at or below \$25,000,** in lieu of an employee reimbursement by miscellaneous payment in accordance with the procedures to directly pay the provider in [DoD FMR Volume 10, Chapter 12, Section 120327](#), and [DoDI 1400.25, Volume 410](#).
- [Title 5 U.S.C., Section 4109](#) authorizes the head of an agency, under the regulations prescribed in [5 U.S.C. 4118\(a\)\(8\)](#), to reimburse employees for necessary training expenses (e.g., tuition and matriculation fees; library and laboratory services; purchase or rental of books, materials, and supplies; and other services or facilities directly related to employee training). **Therefore, training, education, and professional development SF-182 actions are not FAR-based transactions.** See [DoDI 1400.25, Volume 410](#) for additional information regarding the appropriate use of the SF 182.
- The total price of training authorized by the use of a single SF 182 may not exceed \$25,000 in accordance with [DoD FMR Volume 10, Chapter 12, Paragraph 120327](#). SF-182 authorized training may be provided by Government or non-Government sources. When training is provided by a non-Government source, in order to be eligible for GPC payment via the SF-182 process it must consist of a regularly scheduled, commercial-off-the-shelf (COTS) course, training conference, or instructional service that is available to the general public and priced the same for everyone in the same category; e.g., price per student, course, program, service, or training space.
- **Mandatory: If the Government has a need for tailored training or tailored training materials, the requirement shall be placed on Government contract by a warranted contracting officer.**

# QUESTIONS

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<http://www.acq.osd.mil/dpap/pdi/pc/index.html>



U.S. General Services Administration

A large background image of the American flag, showing the stars and stripes. The top portion of the slide is obscured by a red and blue horizontal bar.

# BACK-UP SLIDES

# DD Form 577

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- DD Form 577 - The updated FMR requirement can be found in paragraph 330401 on page 33-10 (which is page 630 of 736 at this link):  
[http://comptroller.defense.gov/Portals/45/documents/fmr/current/05/Volume\\_05.pdf](http://comptroller.defense.gov/Portals/45/documents/fmr/current/05/Volume_05.pdf)

# **WIDE AREA WORK FLOW (WAWF) & GPC**

# WAWF

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## **232.7002 Policy.**

(a)(1) Contractors shall submit payment requests and receiving reports in electronic form, except for—  
(i) Classified contracts or purchases..., (ii) Contracts awarded by deployed contracting officers in the course of military operations... (iii) Purchases to support unusual or compelling needs ... (iv) Cases in which DoD is unable to receive payment requests or provide acceptance in electronic form; (v) Cases in which the contracting officer administering the contract for payment has determined, in writing, that electronic submission would be unduly burdensome to the contractor. In those cases, the contracting officer administering the contract shall furnish a copy of the determination to their Senior Procurement Executive; and

(2) When the Governmentwide commercial purchase card is used as the method of payment, only submission of the receiving report in electronic form is required.

(b) DoD officials receiving payment requests in electronic form shall process the payment requests in electronic form. Any supporting documentation necessary for payment, such as receiving reports, contracts, contract modifications, and required certifications, also shall be processed in electronic form. Scanned documents are acceptable for processing supporting documentation other than receiving reports and other forms of acceptance.

## **232.7003 Procedures.**

(a) The accepted electronic form for submission of payment requests and receiving reports is Wide Area Work Flow (see website – <https://wawf.eb.mil/>).

# WAWF

## 252.232-7003 Electronic Submission of Payment Requests and Receiving Reports.

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As prescribed in [232.7004\(a\)](#), use the following clause:

ELECTRONIC SUBMISSION OF PAYMENT REQUESTS AND RECEIVING REPORTS (JUN 2012)

(a) *Definitions.* As used in this clause—

(1) “Contract financing payment” and “invoice payment” have the meanings given in section 32.001 of the Federal Acquisition Regulation.

(2) “Electronic form” means any automated system that transmits information electronically from the initiating system to all affected systems. Facsimile, e-mail, and scanned documents are not acceptable electronic forms for submission of payment requests. However, scanned documents are acceptable when they are part of a submission of a payment request made using Wide Area WorkFlow (WAWF) or another electronic form authorized by the Contracting Officer.

(3) “Payment request” means any request for contract financing payment or invoice payment submitted by the Contractor under this contract.

(4) “Receiving report” means the data required by the clause at [252.246-7000](#), Material Inspection and Receiving Report.

(b) Except as provided in paragraph (c) of this clause, the Contractor shall submit payment requests and receiving reports using WAWF, in one of the following electronic formats that WAWF accepts: Electronic Data Interchange, Secure File Transfer Protocol, or World Wide Web input. Information regarding WAWF is available on the Internet at <https://wawf.eb.mil/>.

(c) The Contractor may submit a payment request and receiving report using other than WAWF only when—

(1) The Contracting Officer administering the contract for payment has determined, in writing, that electronic submission would be unduly burdensome to the Contractor. In such cases, the Contractor shall include a copy of the Contracting Officer’s determination with each request for payment;

(2) DoD makes payment for commercial transportation services provided under a Government rate tender or a contract for transportation services using a DoD-approved electronic third party payment system or other exempted vendor payment/invoicing system (e.g., PowerTrack, Transportation Financial Management System, and Cargo and Billing System);

(3) DoD makes payment for rendered health care services using the TRICARE Encounter Data System (TEDS) as the electronic format; or

(4) When the Governmentwide commercial purchase card is used as the method of payment, only submission of the receiving report in electronic form is required.

(d) The Contractor shall submit any non-electronic payment requests using the method or methods specified in Section G of the contract.

(e) In addition to the requirements of this clause, the Contractor shall meet the requirements of the appropriate payment clauses in this contract when submitting payment requests.

# What is Accountable Property?

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## Guidebook A.4.3 Accountable Property

- All accountable property acquired with the GPC shall be properly recorded in the appropriate accountable property system of record in accordance with [DoDI 5000.64](#). Accountable property includes (1) Government property purchased or otherwise obtained, having a unit acquisition cost of \$5,000 or more; (2) property of any value that is controlled or managed; (3) leased items of any value; (4) assets that are sensitive or classified; and (5) other items as specified by Component property instructions. Examples include pilferable property subject to theft, property hazardous to public health, small arms, property designated as heritage assets, information technology property, and government-furnished property.
- The CH is responsible for obtaining and retaining a copy of the receiving report and including it in the transaction file. When WAWF is used to create and accept the receiving report, no hard copy is required in the GPC transaction file.
- See [DoD 4100.39-M, Volume 10, Table 61, Controlled Inventory Item Codes](#).

# **FAR PART 8 CHANGES, AT&L CLASS DEVIATION & OTHER ACQUISITION PRIORITIES**

# Mandatory Sources of Supply

## FAR Part 8

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- (a) .. agencies shall satisfy requirements for supplies and services [from mandatory sources] in descending order of priority:
- (b) (1) *Supplies*.
  - (i) Inventories of the requiring agency.
  - (ii) Excess from other agencies (see [subpart 8.1](#)).
  - (iii) Federal Prison Industries, Inc. (see [subpart 8.6](#)).
  - (iv) Supplies that are on the Procurement List maintained by the Committee for Purchase From People Who Are Blind or Severely Disabled (see [subpart 8.7](#)).
  - (v) Wholesale supply sources, such as stock programs of the General Services Administration (GSA) (see 41 CFR 101-26.3), the Defense Logistics Agency (see 41 CFR 101-26.6), the Department of Veterans Affairs (see 41 CFR 101-26.704), and military inventory control points.

Removes Mandatory Federal Supply Schedules, Optional use FSS & Commercial Sources

# Mandatory Sources

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(2) *Services.* Services that are on the Procurement List maintained by the Committee for Purchase From People Who Are Blind or Severely Disabled (see [subpart 8.7](#)).

(b) Sources other than those listed in paragraph (a) of this section may be used as prescribed in 41 CFR 101-26.301 and in an unusual and compelling urgency as prescribed in [6.302-2](#) and in 41 CFR 101-25.101-5.

(c) The statutory obligation for Government agencies to satisfy their requirements for supplies or services available from the Committee for Purchase From People Who Are Blind or Severely Disabled also applies when contractors purchase the supplies or services for Government use.

# Green Procurement Resources

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- **FAR 23.1--Sustainable Acquisition Policy -**  
**23.101 – Definition.** As used in this subpart—“Contract action” means any oral or written action that results in the purchase, rent, or lease of supplies or equipment, services, or construction using appropriated dollars, **including purchases below the micro-purchase threshold.** Contract action does not include grants, cooperative agreements, other transactions, real property leases, requisitions from Federal stock, training authorizations, or other non-FAR based transactions.
- Green Procurement Program Strategy  
[https://www.fedcenter.gov/kd/Items/actions.cfm?action=Show&item\\_id=12371&destination=ShowItem](https://www.fedcenter.gov/kd/Items/actions.cfm?action=Show&item_id=12371&destination=ShowItem)
- CLC 046 Green Procurement Training [http://icatalog.dau.mil/onlinecatalog/courses.aspx?crs\\_id=497](http://icatalog.dau.mil/onlinecatalog/courses.aspx?crs_id=497)
- Database of Environmental Information for Products and Services  
<http://yosemite1.epa.gov/oppt/eppstand2.nsf>
  - Shows promise, but not there yet...

# Micro-purchase Threshold Definition

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- “Micro-purchase threshold” means \$3,000, except it means—
  - (1) For acquisitions of construction subject to the Davis-Bacon Act, \$2,000;
  - (2) For acquisitions of services subject to the Service Contract Act, \$2,500; and
  - (3) For acquisitions of supplies or services that, as determined by the head of the agency, are to be used to support a contingency operation or to facilitate defense against or recovery from nuclear, biological, chemical or radiological attack as described in [13.201\(g\)](#) (1), except for construction subject to the Davis-Bacon Act (41 U.S.C. 428a)--
    - (i) \$15,000 in the case of any contract to be awarded and performed, or purchase to be made, inside the United States; and
    - (ii) \$30,000 in the case of any contract to be awarded and performed, or purchase to be made outside the United States.

# FAR 13.203

## [Micro-purchase] Purchase Guidelines

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- (a) *Solicitation, evaluation of quotations, and award.*
- (1) To the extent practicable, micro-purchases shall be distributed equitably among qualified suppliers.
- (2) Micro-purchases may be awarded without soliciting competitive quotations if the contracting officer or individual appointed in accordance with [1.603-3\(b\)](#) considers the price to be reasonable.
- (3) The **administrative cost of verifying the reasonableness** of the price for purchases may more than offset potential savings from detecting instances of overpricing. Therefore, action to verify price reasonableness need only be taken if --
- (i) The contracting officer or individual appointed in accordance with [1.603-3 \(b\)](#) suspects or has information to indicate that the price may not be reasonable (*e.g.*, comparison to the previous price paid or personal knowledge of the supply or service); or
- (ii) Purchasing a supply or service for which no comparable pricing information is readily available (*e.g.*, a supply or service that is not the same as, or is not similar to, other supplies or services that have recently been purchased on a competitive basis).
- (b) *Documentation.* If competitive quotations were solicited and award was made to other than the low quoter, documentation to support the purchase may be limited to identification of the solicited concerns and an explanation for the award decision.

# SAM Debt Check

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- **32.602 -- Responsibilities.**
- (a) The contracting officer has primary responsibility for identifying and demanding payment of contract debts except those resulting from errors made by the payment office. The contracting officer shall not collect contract debts or otherwise agree to liquidate contract debts (*e.g.*, offset the amount of the debt against existing unpaid bills due the contractor, or allow contractors to retain contract debts to cover amounts that may become payable in future periods).
- (b) The payment office has primary responsibility for—
  - (1) Collecting contract debts identified by contracting officers;
  - (2) Identifying and collecting duplicate and erroneous payments; and
  - (3) Authorizing the liquidation of contract debts in accordance with agency procedures.
- **32.603 – Debt Determination.**
- (a) If the contracting officer has any indication that a contractor owes money to the Government under a contract, the contracting officer shall determine promptly whether an actual debt is due and the amount. Any unnecessary delay may contribute to—
  - (1) Loss of timely availability of the funds to the program for which the funds were initially provided;
  - (2) Increased difficulty in collecting the debt; or
  - (3) Actual monetary loss to the Government.
- (b) The amount of indebtedness determined by the contracting officer shall be an amount that—
  - (1) Is based on the merits of the case; and
  - (2) Is consistent with the contract terms.

# FPDS REPORTING

# Federal Procurement Data System (FPDS)

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- FPDS is the central collection point for all federal agency contract award information (since 1977)
  - Reporting required by statute; and closely related to several statutes (including FFATA)
- FPDS reporting requirements are found in FAR 4.6
  - No exemption for orders under schedules, BPAs or IDIQs
- DPAP memo Oct 26, 2010 reiterated existing reporting requirements; need to track GPC orders to:
  - Track contract ceilings for compliance with mins and maxs
  - Determine which GPC purchases are related to contracts vs open-market
- DPAP memo 19 April 2014 provided the following GPC clarifications:
  - All orders under existing contracts, including those valued below the MPT, shall be reported
  - Awards  $\geq$  \$25K (rather than the MPT of \$30K in FAR part 2) that are awarded and performed, or purchase is made, outside the US must be individually reported to comply with Federal Funding Accountability and Transparency Act

# GPC-Related Purchases and FPDS

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- DO NOT REPORT to FPDS open-market micro-purchase actions purchased and paid for using the GPC
  - ‘Open-market’ means actions that are not under a federally issued contract or agreement (i.e., not under a federal supply schedule (FSS), Agency IDIQ or BPA)
  - GPC may only be used for open-market actions when the value of the action is less than or equal to the micro-purchase threshold (see FAR 2.101 and DFARS 213.301)
- DO REPORT all other GPC use under contracts to FPDS
  - When a Contracting Officer designates the GPC as the payment method against a contract, report the action as any other individual contract action report – be sure to mark ‘Purchase Card as Payment Method’ as ‘Yes’
  - When a Contracting Officer, Ordering Officer or other Cardholder uses the GPC to place and order (purchase/pay) under an FSS, IDIQ or BPA – there are three options

# FPDS Reporting Options for GPC Orders Under Contracts / Agreements

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- In descending order of preference:
  1. Individually, actual vendor DUNS and order number
  2. Using express reporting procedures that compile all actions monthly under the identified existing contract
  3. Using express reporting procedures that compile all actions monthly without specifically identifying the existing contract/agreement and vendor (use generic GPC DUNS)
- For #1 or #2, the contracting office may require ordering officers to report directly to FPDS – recommended for high-use/high-limit users to ensure accuracy
- For #3 – contracting offices should accomplish to ensure all actions are included

## Limitations of Choice #3

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- Only use this alternative when the first two choices are determined to be overly burdensome by the Head of the Contracting Agency
- When used, identify the vendor using the generic DUNS number for either domestic or foreign GPC consolidated reporting
- Use the 'Purchase Order' FPDS form
- Reports must be submitted at least monthly

# Going Forward

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- Components need to ensure that their card programs have processes in place to enable the required reporting
- DPAP is working with DLA eMall to automate required FPDS-NG reporting
- DPAP will also be working with GSA regarding GSA Advantage reporting to FPDS (and EDA)



U.S. General Services Administration

A close-up, grayscale image of the stars on the American flag, serving as a background for the "END" text.

**END**