



ACQUISITION,
TECHNOLOGY
AND LOGISTICS

OFFICE OF THE UNDER SECRETARY OF DEFENSE

3000 DEFENSE PENTAGON
WASHINGTON, DC 20301-3000

SEP 21 2017

MEMORANDUM FOR ARMY PROCUREMENT EXECUTIVE

Subject: Travel Purchase Prohibition for Governmentwide Commercial Purchase Card

On June 16, 2016, the Army requested that Director, Defense Procurement and Acquisition Policy (DPAP) provide clarifying guidance regarding the proper procurement vehicle(s) to purchase Lodging in Kind requirements. This package included a U.S. Army Contracting Command (ACC) legal opinion (AMCLC-RSA-AO-B of 9 May 2016) stating, "The GPC is not an authorized procurement method to acquire LIK. However, it is an authorized payment method when an underlying contracting vehicle is in place."

After consideration of the documentation provided, my staff forwarded the Army package to General Counsel (GC) for the Office of the Secretary of Defense (OSD) for review/concurrence. In accordance with established protocols, OSD GC referred the ACC legal opinion to Army GC. Upon receipt of Army GC's concurrence with the ACC legal opinion, OSD GC closed the action.

Accordingly, this memorandum reaffirms the DPAP/Program Development and Implementation position that GPC purchases for travel related expenses are prohibited as stated in the Department of Defense Government Charge Card Guidebook for Establishing and Managing Purchase, Travel, and Fuel Card Programs, section A.2.4 Prohibited Purchases, paragraph v. This prohibition includes travel related expenses for LIK, Subsistence in Kind (SIK), and Junior Reserve Officers' Training Corps (JROTC) and remains unchanged. For travel related expenses, the GPC may only be used to make payments against contracts awarded by warranted contracting officers.

To ensure compliance with this GPC policy, Army is requested to provide the following to my office:

1. By 31 October 2017, all data for FYs 16/17 Army GPC travel related transactions that at a minimum address:
 - a. Number of Transactions
 - b. Dollar value of Transactions
 - c. Purpose of Transactions (e.g., LIK, SIK, JROTC)
 - d. Appropriate Action Type (FAR-based contract action, miscellaneous pay, JTR travel)

2. To ensure compliance with the policy mentioned above:
 - a. By 30 November 2017, a draft corrective action plan including a milestone schedule.
 - b. By 15 January 2018, a final corrective action plan including a milestone schedule.

My point of contact for this matter is Denise Reich, denise.a.reich.civ@mail.mil, 703-697-4404.



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