GPC PROGRAM
POLICIES & DIRECTIVES

DENISE REICH
OSD, OUSD (AT&L) DPAP/PDI
AUGUST 2017
This session provides an overview of topical issues related to DoD policies, procedures and directives.
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<td>DoDIG</td>
<td>Department Of Defense Inspectors General</td>
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<td>FPI</td>
<td>Federal Prison Industries (AKA UNICOR)</td>
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<td>FMR</td>
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<td>GPC</td>
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<td>Guidebook</td>
<td>DoD Charge Card Guidebook for Establishing &amp; Managing Purchase, Travel &amp; Fuel Card Programs to be released April 2014</td>
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<td>STRL</td>
<td>Science and Technology Reinvention Laboratories</td>
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<td>Ts&amp;Cs</td>
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AGENDA

1. GPC Micro-Purchase Threshold Class Deviation and Guidance
2. GPC Violation Definitions
3. OMB Reporting Guidance
Micro-Purchase Threshold

13 July 2017 Class Deviation and 21 July 2017 GPC Policy Memo
MEMORANDUM FOR COMMANDER, UNITED STATES SPECIAL OPERATIONS COMMAND (ATTN: ACQUISITION EXECUTIVE) COMMANDER, UNITED STATES TRANSPORTATION COMMAND (ATTN: ACQUISITION EXECUTIVE) DEPUTY ASSISTANT SECRETARY OF THE ARMY (PROCUREMENT) DEPUTY ASSISTANT SECRETARY OF THE NAVY (ACQUISITION AND PROCUREMENT) DEPUTY ASSISTANT SECRETARY OF THE AIR FORCE (CONTRACTING) DIRECTORS OF THE DEFENSE AGENCIES DIRECTORS OF THE DOD FIELD ACTIVITIES

SUBJECT: Class Deviation 2017-O0006, Increased Micro-Purchase Threshold

Effective immediately, for DoD acquisition of supplies or services funded by DoD appropriations, contracting officers and other individuals delegated micro-purchase authority shall use the following definition of “micro-purchase threshold” in lieu of the definition at FAR 2.101:

“Micro-purchase threshold,” means $5,000 (10 U.S.C. 2338), except—

(1) For DoD acquisition of supplies or services for basic research programs and for activities of the DoD science and technology reinvention laboratories, it means $10,000 (10 U.S.C. 2339); and

(2) As provided at paragraphs (1) through (3) of the definition of “micro-purchase threshold” at FAR 2.101.

This deviation implements sections 217(a) and 821 of the National Defense Authorization Act for Fiscal Year 2017 (Pub. L. 114-328). Section 217(a) increases the micro-purchase threshold for DoD procurements to $5,000. Section 217(a) further increases the micro-purchase threshold to $10,000 for purposes of DoD basic research programs, and for the activities of the DoD science and technology reinvention laboratories. This class deviation is effective until it is incorporated in the DFARS or until this class deviation is otherwise rescinded. My point of contact is Ms. Carrie Moore, who is available at 571-372-6093, or at carrie.m.moore.civ@mail.mil.

Claire M. Grady, Director, Defense Procurement and Acquisition Policy

Footnotes:

1. For construction acquisitions subject to 40 U.S.C. chapter 31, subchapter IV, Wage Rate Requirements
2. For services acquisitions subject to 40 U.S.C. chapter 67, Service Contract Labor Standards
# Authorized MPTS and Applicable GPC Micro-Purchase Regulations

<table>
<thead>
<tr>
<th>FUNCTION</th>
<th>Threshold</th>
<th>FAR 1.6</th>
<th>FAR 5</th>
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<th>FAR 19</th>
<th>Part 4.11</th>
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<th>Transaction Authority</th>
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<tr>
<td><strong>MICRO-PURCHASE</strong>¹</td>
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<tr>
<td>1</td>
<td>Federal-wide GPC Open Market Micro-Purchases²</td>
<td>$3,500</td>
<td>n</td>
<td>n</td>
<td>n</td>
<td>n</td>
<td>y</td>
<td>n</td>
<td>y</td>
<td>n</td>
<td>EQUITABLY</td>
<td>FAR 2.101 &amp; FAR 13.2</td>
</tr>
<tr>
<td>2</td>
<td>GPC Construction Micro-Purchases³</td>
<td>$2,000</td>
<td>n</td>
<td>n</td>
<td>n</td>
<td>n</td>
<td>y</td>
<td>n</td>
<td>n</td>
<td>n</td>
<td>n</td>
<td>FAR 2.101 &amp; FAR 13.2</td>
</tr>
<tr>
<td>3</td>
<td>GPC Service Contract Labor Standard Micro-Purchases⁴</td>
<td>$2,500</td>
<td>n</td>
<td>n</td>
<td>n</td>
<td>n</td>
<td>y</td>
<td>n</td>
<td>n</td>
<td>n</td>
<td>n</td>
<td>FAR 2.101 &amp; FAR 13.2</td>
</tr>
<tr>
<td>4</td>
<td>GPC Contingency (CONUS) Micro-Purchases⁵</td>
<td>$20,000</td>
<td>n</td>
<td>n</td>
<td>n</td>
<td>n</td>
<td>y</td>
<td>n</td>
<td>n</td>
<td>n</td>
<td>n</td>
<td>FAR 2.101 &amp; DFARS 213.270 (c)(3)</td>
</tr>
<tr>
<td>5</td>
<td>GPC Contingency (OCONUS) Micro-Purchases⁵</td>
<td>$30,000</td>
<td>n</td>
<td>n</td>
<td>n</td>
<td>n</td>
<td>y</td>
<td>n</td>
<td>n</td>
<td>n</td>
<td>n</td>
<td>FAR 2.101 &amp; DFARS 213.270 (c)(3)</td>
</tr>
<tr>
<td>6</td>
<td>DoD GPC Open Market Micro-Purchase (General)⁶</td>
<td>$5,000</td>
<td>n</td>
<td>n</td>
<td>y if &gt; $3,500</td>
<td>y if &gt; $3,500</td>
<td>n</td>
<td>y</td>
<td>n</td>
<td>n</td>
<td>2017-O0006 of 13 July 2017</td>
<td>FAR 1.603-3(b) - Micro-purchase in writing</td>
</tr>
<tr>
<td>7</td>
<td>DoD GPC Open Market Micro-Purchase (STRLs and Basic Research Programs)⁶</td>
<td>$10,000</td>
<td>n</td>
<td>n</td>
<td>y if &gt; $3,500</td>
<td>y if &gt; $3,500</td>
<td>n</td>
<td>y</td>
<td>n</td>
<td>n</td>
<td>2017-O0006 of 13 July 2017</td>
<td>FAR 1.603-3(b) - Micro-purchase in writing</td>
</tr>
</tbody>
</table>
“Micro-purchase” means an acquisition of supplies or services using simplified acquisition procedures, the aggregate amount of which does not exceed the micro-purchase threshold.

FAR 2.101 “Micro-purchase threshold” means $3,500, except it means—

1. For acquisitions of construction subject to 40 U.S.C. chapter 31, subchapter IV, Wage Rate Requirements (Construction), $2,000

2. For acquisitions of services subject to 41 U.S.C. chapter 67, Service Contract Labor Standards, $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 40 U.S.C. chapter 31, subchapter IV, Wage Rate Requirements (Construction) (41 U.S.C. 1903)-- (i) $20,000 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.

• No change for GPC Use Outside the United States (U.S.)
  – These GPC purchases are simplified acquisitions, but not micro-purchases
  – FAR 213.301 (2) authorizes GPC CH to use the GPC to make a purchase that exceeds the MPT but does not exceed $25,000, if—
    (i) The purchase—
      (A) Is made outside the United States for use outside the United States; and
      (B) Is for a commercial item;
      (C) Is not for work to be performed by employees recruited within the United States;
      (D) Is not for supplies or services originating from, or transported from or through, sources identified in FAR Subpart 25.7 [Prohibited Sources];
      (E) Is not for ball or roller bearings as end items;
      (F) Does not require access to classified or Privacy Act information; and
      (G) Does not require transportation of supplies by sea; and
    (ii) The individual making the purchase—
      (A) Is authorized and trained in accordance with agency procedures;
      (B) Complies with the requirements of FAR 8.002 [Mandatory Sources] in making the purchase; and
      (C) Seeks maximum practicable competition for the purchase in accordance with FAR 13.104(b).
• FAR 13.104 Promoting Competition

(b) If using simplified acquisition procedures and not providing access to the notice of proposed contract action and solicitation information through the Governmentwide point of entry (GPE), maximum practicable competition ordinarily can be obtained by soliciting quotations or offers from sources within the local trade area.

Unless the contract action requires synopsis pursuant to 5.101 and an exception under 5.202 is not applicable, consider solicitation of at least three sources to promote competition to the maximum extent practicable. Whenever practicable, request quotations or offers from two sources not included in the previous solicitation.
To minimize DoD’s Charge Card violation risk, the Guidebook requires spending limits be set considering historical spending patterns:

- Raise and then lower Single Purchase Limits for CHs who rarely (or seasonally) make purchases requiring the higher MPT.

Only grant authority above $3,500 to CHs who:

- are likely to require it
- have been trained to follow small business set-aside procedures [FAR 19.502-2(a)]
- have been trained to follow FPI purchasing and waiver request procedures [FAR 8.605]

CH Single Purchase Limits can never exceed the CH’s delegated authority:

- New Delegation Letters must be issued and countersigned as required
- PCOLS users should make single purchase limit increases using PCOLS

Basic Research Program GPC micro-purchases valued above $5,000 must be made on a CH account issued solely for that purpose.
• Purchases funded with non-DoD appropriations are limited to the $3,500 MPT

  – Servicing Agencies making Assisted Acquisitions on behalf of non-DoD Requesting Agencies are limited to $3,500
Science and Technology Reinvention
Laboratories MPT
• This $10K MPT is granted only to DoD Laboratories and Centers authorized by Congress as STRLs
• Authorized for micro-purchases made by STRLs using DoD appropriations (e.g., including office supplies)
• Research, Development and Engineering Command (RDECOM)
  – Army Research Laboratory (ARL)
  – Edgewood Chemical and Biological Center (ECBC)
  – Armament Research, Development and Engineering Center (ARDEC)
  – Natick Soldier Research, Development and Engineering Center (NSRDEC)
• Aviation and Missile Research, Development, and Engineering Center (AMRDEC)
• Tank and Automotive Research, Development, and Engineering Center (TARDEC)
• Army Research Institute for the Behavioral and Social Sciences (ARI)
• Space and Missile Defense Command Technical Center (SMDC TC)

• Medical Research and Materiel Command (MRMC)
  – U.S. Army Aeromedical Research Laboratory (USAARL)
  – U.S. Army Institute of Surgical Research (USAISR)
  – U.S. Army Medical Research Institute of Chemical Defense (USAMRICD)
  – U.S. Army Medical Research Institute of Infectious Disease (USAMRIID)
  – U.S. Army Research Institute of Environmental Medicine (USARIEM)
  – Walter Reed Army Institute of Research (WRAIR)

• Communications Electronics Research, Development, and Engineering Center (CERDEC)*

• Engineer Research and Development Center (ERDC)
STRLs - U.S. Air Force and U.S. Navy

U.S. Air Force

- Air Force Research Laboratory (AFRL)
  - Materials and Manufacturing (RX)
  - Space Vehicles (RV)
  - Sensors (RY)
  - Information (RI)
  - Aerospace Systems (RQ)
  - Munitions (RW)
  - 711th Human Performance Wing (711 HPW)
  - Directed Energy (RD)
  - Air Force Office of Scientific Research (AFOSR)

Navy

- Naval Research Laboratory (NRL)
- Office of Naval Research (ONR)
- Naval Sea Systems Command Centers
  - Naval Surface Warfare Centers (NSWC)
  - Naval Undersea Warfare Centers (NUWC)
- Naval Air Warfare Centers (NAWC)
  - Weapons Division (NAWC WD)
  - Aircraft Division (NAWC AD)
- Space and Naval Warfare Centers (SPAWAR)
  - Systems Center Pacific (SSC-P)
  - Systems Center Atlantic (SSC-A)
Basic Research Programs MPT
• Basic Research Programs MPT
  – Purchase authority granted based on what is being purchased
  – Must be funded with DoD Research, Development, Test and Evaluation (RDT&E), Budget Activity 1, Basic Research funding [DoD FMR, Volume 2B, Chapter 5, 050105 and 050106]
  – Basic Research Program GPC micro-purchases valued above $5,000 must be made on a CH account issued solely for that purpose
Federal Prison Industries (AKA: UNICOR) New GPC Procedures
• Follow FAR 8.002 - Mandatory Government Sources Priority List

(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 which are on the Procurement List maintained by the Committee for Purchase From People Who Are Blind or Severely Disabled (AKA AbilityOne) (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.

(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).

NOTE: FPI is higher priority for Supplies; AbilityOne is higher priority for Services. [FAR 8.603 & 8.002]
• Purchase from FPI is not mandatory & a waiver is not required if:

1. Acquiring supplies totaling $3,500 or less [FAR 8.605(e)]
2. FPI is not a mandatory supplier for the supply being purchased
   • https://www.unicor.gov/sopAlphaList.aspx
3. For DoD Purchases of Mandatory FPI Supplies in FSCs for which FPI's share of the DoD Market is greater than 5%
   • https://www.unicor.gov/MandatorySourceExceptions.aspx#dod
4. Contracting Officer determines the mandatory supply is not comparable to supplies available from the private sector that best meet the Government’s needs in terms of price, quality, and time of delivery. [FAR 8.602]
   – CH appointed in accordance with FAR 1.603-3 are not Contracting Officers
5. The CH requests and FPI grants a purchase waiver [FAR 8.604]
FPI PRODUCT AND SERVICE CATEGORIES

Products
- Apparel and Accessories
- Awards and Plaques
- Electronics
- Energy-Efficient and Green Products
- Eyewear
- Facilities and Correctional Mgmt
- Food Service
- Industrial Storage
- Mattresses, Linens, Beds, and Drapes
- Office Furniture, Seating, and Accessories
- Print Products
- Signage

Services
- Computer Aided Design
- Contact Center Solutions
- Data Services
- Electronics Recycling
- Binding and Bindery Services
- Range Solutions
- Vehicle Upfit, Remanufacturing, and Fleet Services
- Distribution, Warehousing, and Logistics

Source: https://www.unicor.gov/Shopping/viewCat_m.asp?iStore=UNI
**UNICOR Schedule of Products and Services**

DoD Agencies: Please consult your contracting/procurement officer for guidance.

<table>
<thead>
<tr>
<th>Product</th>
<th>FSC Code</th>
<th>Legend</th>
</tr>
</thead>
<tbody>
<tr>
<td>ADP &amp; Telecommunications Services</td>
<td>FSC D399</td>
<td>🌿</td>
</tr>
<tr>
<td>ADP Entry Services</td>
<td>FSC D303</td>
<td>🌿</td>
</tr>
<tr>
<td>ADP/Modular Furniture</td>
<td>FSC 7110</td>
<td>🌿</td>
</tr>
<tr>
<td>Agricultural Products</td>
<td>FSC 8905, 8910, 8915</td>
<td>🌿</td>
</tr>
<tr>
<td>Air Filters</td>
<td>FSC 4460</td>
<td>🌿</td>
</tr>
<tr>
<td>Aircraft Cable/Harness Assemblies</td>
<td>FSC 1680</td>
<td>🌿</td>
</tr>
<tr>
<td>Amplifiers</td>
<td>FSC 5996</td>
<td>🌿</td>
</tr>
<tr>
<td>Animals Raised for food</td>
<td>FSC 8810</td>
<td>🌿</td>
</tr>
<tr>
<td>Antennas &amp; Related Mounting Accessories</td>
<td>FSC 5985</td>
<td>🌿</td>
</tr>
<tr>
<td>Architectural Signage, Interior &amp; Exterior</td>
<td>FSC 9905</td>
<td>🌿</td>
</tr>
<tr>
<td>Armament Training Devices</td>
<td>FSC 6920</td>
<td>🌿</td>
</tr>
<tr>
<td>Armor, Personal (helmets &amp; vests)</td>
<td>FSC 8470</td>
<td>🌿</td>
</tr>
<tr>
<td>Assembly/Packaging</td>
<td>FSC R604</td>
<td>🌿</td>
</tr>
<tr>
<td>Awards &amp; Plaques, Custom (M)</td>
<td>FSC 9905</td>
<td>🌿</td>
</tr>
</tbody>
</table>

**Legend**

- 🌿 Green Recycled - Green/Recycled/Green/Recycled/Recyclable items
- 🌿 Competitive - Competitive items listed as "competitive" on FPI's Schedule of Products reflect those items that have been approved for production by FPI's Board of Directors and added to the Schedule, under the premise that FPI will compete to obtain the business, just as any other private sector offerer.
- 🌿 Mandatory - Mandatory Federal customers are required to give procurement priority to FPI, when UNICOR is able to provide the desired product, within the required time frame, and at a competitive price.
- 🌿 Services - Services: All services offered by FPI have always been considered as non-mandatory. As such, customers may purchase services from FPI directly, whenever they determine FPI's services offerings are able to meet their needs.
- 🌿 Non-mandatory - Non-mandatory: The mandatory source for this product has been administratively waived by FPI's Board of Directors in accordance with the Board's resolution, customers who rely upon FPI to meet their product needs for these items may continue to purchase these items from FPI directly, of their own volition.

Alternatively, should the customer determine that it is in their best interests to procure the item through other means, the customer is not required to request a waiver from FPI. For those items where FPI’s mandatory source has been administratively waived, FPI must be given full visibility of the requirement (i.e., provided the same information and specifications as are provided to all private sector offerers) and a fair and equitable opportunity to submit a competitive offer.

Source: [https://www.unicor.gov/SopAlphaList.aspx](https://www.unicor.gov/SopAlphaList.aspx)
DoD Purchases of Products in FSCs for which FPI's share of the DoD Market is Greater than 5%

Section 827 of the National Defense Authorization Act for Fiscal Year 2008, Public Law 110-181, changes competition requirements for purchases from FPI.

Effective March 31, 2008, Section 827 requires DoD contracting activities to use competitive procedures when procuring products for which FPI has a significant DoD market share (defined as being greater than 5% of the DoD's market share in any Federal Supply Code (FSC). In using these procedures, FPI must be included in the solicitation process.

As of March 31, 2017, these FSCs currently meet this criterion:

- NO71: Installation of Equipment - Furniture
- 7125: Cabinets, Lockers, Bins, and Shelving
- 7210: Household Furnishings
- 7230: Draperies, Awnings, and Shades
- 8315: Notions and Apparel Findings
- 8405: Outerwear, Men’s
- 8415: Clothing, Special Purpose
- 8470: Armor, Personal
- 9905: Signs, Advertising Displays, and Identification Plates

DoD purchases for items in FSCs not listed, above, are subject to the prevailing general procurement procedures; see APPLICABLE LAWS

Source: https://www.unicor.gov/MandatorySourceExceptions.aspx#dod
CH Receives Requirement Valued Above $3,500

Follow Existing Micro-Purchase Procedures

Mandatory FPI Item?\(^1\)

CH\(^{2A}\) Market Research indicates comparable?

Y

KO\(^{2B}\) authorizes Alternate Source?

N

Waiver Requested & Granted by FPI?

Y

Purchase from FPI

N

Make Purchase Following Existing Micro-Purchase Procedures

Purchase following Micro-Purchase Procedures. If soliciting offers, FPI must be included.
1. Check FPI Web Page to determine if:
   
   – DoD Purchases of Mandatory FPI Supplies in FSCs for which FPI's share of the DoD Market is greater than 5%
     • https://www.unicor.gov/MandatorySourceExceptions.aspx#dod
   
   – Item that FPI is the mandatory supplier
     • https://www.unicor.gov/sopAlphaList.aspx

2. A) CH market research indicates; and

   B) KO issues a written determination the FPI item is not comparable to supplies available from the private sector that best meet the Government’s needs in terms of price, quality, and time of delivery. [FAR 8.602]
• Micro-Purchase Purchasing Guidelines (i.e., Applicable Competitive Procedures)

  – Micro-purchases shall be distributed equitably among qualified suppliers

  – Micro-purchases may be awarded without soliciting competitive quote if cost to solicit offers exceeds expected savings, and the KO or CH considers the price to be reasonable [FAR 13.203]

    • CH has recently purchased the item on a competitive basis [reviewed 3 quotes]

    • CH does not suspect or have information indicating the price may not be reasonable
Small Business Set-Aside
New GPC Procedures
SMALL BUSINESS SET-ASIDE

• FAR and DFARS
  – Require supply and service acquisitions valued between $3,500.01$ and $150,000^2$ to be automatically exclusively reserved and set-aside for small business [FAR 13.003(b)(1) & 19.5]
    • Does not apply to purchases from FAR Part 8 Mandatory Sources [FAR 19.502-1(b)]
    • Unless a Contracting Officer determines there is not a reasonable expectation of obtaining offers from two or more responsible small business concerns that are competitive in terms of market price, quality, and delivery (“Rule of Two”). A Contracting Officer must document the file if a set-aside is not used. [FAR 19.502-2(a)]
      – CH appointed in accordance with FAR 1.603-3 are not Contracting Officers
    • Completion of DD Form 2579 only required for acquisitions exceeding $10,000 (including orders placed against Federal Supply Schedule contracts) [DFARS 219.201(10)(A)]

1. $20,000 for acquisitions as described in 13.201(g)(1)
2. $750,000 for acquisitions described in paragraph (1) (i) of the FAR 2.101 SAT definition
CH Receives Requirement Valued Above $3,500

Follow Existing Micro-Purchase Procedures

Available from Mandatory Source?

Make Purchase from Mandatory Source

Available following Small Business Rule of 2?

Make Micro-Purchase from Small Business

KO Issues written determination not to Set-Aside?

KO Makes Purchase or Provides Purchasing Guidance

Make Purchase Following Existing Micro-Purchase Procedures
• Small Business Size determinations are made by Contracting Officers using North American Industry Classification System NAICS codes in the System for Award Management (SAM) [FAR 19.303]

• DPAP working with DAU to identify and develop appropriate training materials
  – It appears CON 200 has most applicable content
Coming Soon
This FAR Case will:

- Implement Section 217 of the 2017 NDAA

- Increase the MPT to $10,000, or a higher amount as determined appropriate by the head of the executive agency and consistent with clean audit findings under chapter 75 of title 31, internal institutional risk assessment, or State law, for acquisitions from institutions of higher education or related or affiliated nonprofit entities, or from nonprofit research organizations or independent research institutes.
OMB Reporting

Overview
Objective:

To determine whether DoD purchase card and travel card reporting on waste, misuse, abuse, and fraud is complete and accurate
Factors that impacted OMB GPC Reporting completeness and accuracy:

– Inconsistencies within and between OMB, DoD and Component Charge Card violations definitions
  
  • For example, “Misuse” is used both as a overarching term and a specific violation category in OMB Circular A-123

– Lack of written DoD Guidance for Quarterly and Semi-Annual Reporting
CURRENT STATUS: ACTIONS TAKEN TO IMPROVE OMB REPORTING

• Issued DoD GPC Disciplinary Category Definitions Guidance Memo to provide interim definitions and examples
  – DPAP now uses “Violation” as the overarching term
  – Memo provided to DoD Travel, DoD Fleet, OMB, and GSA and recommended adoption across all Government charge card programs

• Components responding to requests for missing or inaccurate FY15 – FY 16 data

• Issued DoD OMB Reporting Guidance

• DoD GPC OMB Quarterly and Semi-Annual Training conducted in June
  – Provide information and synchronize understanding across the Department
GPC Disciplinary Category Definitions

OMB Reporting
INTERIM GUIDANCE - OMB REPORTING DISCIPLINARY CATEGORY DEFINITIONS

- Issued 3 July 2017
- Provides interim definitions and examples

<table>
<thead>
<tr>
<th>Reportable Violations</th>
<th>Non-Reportable Violations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Abuse</td>
<td>Administrative Discrepancy</td>
</tr>
<tr>
<td>Internal Fraud</td>
<td>External Fraud</td>
</tr>
<tr>
<td>Misuse</td>
<td></td>
</tr>
<tr>
<td>Delinquency</td>
<td></td>
</tr>
</tbody>
</table>

- Introduces the concept of “Intentionality”
- Allows for supervisory discretion
- Begin use:
  - Quarterly – FY18 Q1
  - Semi-Annual – FY18 Q1-Q2
### INTERIM ADMINISTRATIVE DISCREPANCY & EXTERNAL FRAUD DEFINITIONS

<table>
<thead>
<tr>
<th>Category</th>
<th>Administrative Discrepancy</th>
<th>External Fraud</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reportable to OMB?</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Classification</td>
<td>Unintentional</td>
<td>Malicious Intent</td>
</tr>
<tr>
<td>Definition</td>
<td>Actions that violate operational policies/procedures but do not violate federal law or regulation. Specifically: GPC supplies/services acquired fulfill a valid government need at a fair and reasonable price at no additional cost to the Government, but required policy/procedures were not followed.</td>
<td>Any felonious act of corruption or attempt to cheat the Government or corrupt the Government's agents by someone other than Government Purchase Card Program officials.</td>
</tr>
<tr>
<td>Examples</td>
<td>Examples include but are not limited to: incomplete forms and documentation; failure to maintain required documents for the required time period. Administrative discrepancies require agency/internal corrective action, and are not reportable to OMB unless they are persistent, pervasive or willful in nature, in which case they are reportable as abuse, fraud or misuse.</td>
<td>Examples include but are not limited to: a merchant’s intentional charges for services not provided; the unauthorized use by a third party of a CH’s compromised or stolen account.</td>
</tr>
</tbody>
</table>
### INTERIM INTERNAL FRAUD DEFINITION

<table>
<thead>
<tr>
<th>Category</th>
<th>Internal Fraud</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reportable to OMB?</td>
<td><strong>Yes</strong></td>
</tr>
<tr>
<td>Classification</td>
<td>Malicious Intent</td>
</tr>
<tr>
<td>Definition</td>
<td>Any felonious act of corruption or attempt to cheat the Government or corrupt the Government's agents by Government Purchase Card Program officials. Use of GPC to transact business that is not sanctioned, not authorized, not in one's official government capacity, not for the purpose for which the card was issued, not as part of official government business.</td>
</tr>
<tr>
<td>Examples</td>
<td>Examples include, but are not limited to a CH intentionally: purchasing power tools for personal use; paying for repairs of privately owned equipment; purchasing items or extra quantity of items for resale or to give away to relatives.</td>
</tr>
</tbody>
</table>
**INTERIM ABUSE DEFINITIONS**

<table>
<thead>
<tr>
<th>Category</th>
<th>Abuse</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reportable to OMB?</td>
<td>Yes</td>
</tr>
<tr>
<td>Classification</td>
<td>Intentional</td>
</tr>
<tr>
<td>Definition</td>
<td>Intentional use of the GPC in violation of the FAR, DFARS, Agency Supplements, or activity Government Purchase Card (GPC) policies/procedures. Evidence of intentionality shall be inferred from repeat offenses of the same violation, following administrative and/or disciplinary action taken for this violation.</td>
</tr>
<tr>
<td>Examples</td>
<td>Examples include, but are not limited to, intentionally: failing to purchase from mandatory sources, exceeding the applicable micro purchase threshold, purchasing items such as a day planner costing $300 rather than one costing $45; or splitting requirements to avoid card thresholds.</td>
</tr>
</tbody>
</table>
### Interim Misuse Definition

<table>
<thead>
<tr>
<th>Category</th>
<th>Misuse</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reportable to OMB?</td>
<td>Yes</td>
</tr>
<tr>
<td>Classification</td>
<td>Unintentional</td>
</tr>
<tr>
<td>Definition</td>
<td>Unintentional use of the GPC in violation of the FAR, DFARS, Agency Supplements, or activity GPC policies/procedures. These actions are the result of ignorance and/or carelessness, lacking intent.</td>
</tr>
<tr>
<td>Examples</td>
<td>Examples include but are not limited to, unintentionally: purchasing excessive quantities of an item with limited shelf life; violating a specific-use policy such as an agency that requires headquarters to buy all furniture; failing to certify &quot;Purchase Card Certification Statements&quot; on time, costing the Government maximum rebates and incurrence of prompt payment interest.</td>
</tr>
</tbody>
</table>
“Waste” and “Inefficiency” are not separately defined categories, but rather incorporated under Abuse (intentional) or Misuse (unintentional)

<table>
<thead>
<tr>
<th>Intentional Abuse</th>
<th>Unintentional Misuse</th>
</tr>
</thead>
<tbody>
<tr>
<td>Purchasing items exceeding minimum need</td>
<td>Mistakenly violating local policy for valid requirement.</td>
</tr>
<tr>
<td>(e.g., purchasing a $300 day planner rather than one for $45)</td>
<td>(e.g., purchasing furniture on the open market instead of sending requirement to HQ</td>
</tr>
<tr>
<td>- Formerly Waste</td>
<td>for purchase under strategic sourcing arrangement as required by local policy</td>
</tr>
<tr>
<td></td>
<td>- Formerly Inefficiency</td>
</tr>
</tbody>
</table>
### INTERIM DELINQUENCY DEFINITION

<table>
<thead>
<tr>
<th>Category</th>
<th>Delinquency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reportable to OMB?</td>
<td>Yes</td>
</tr>
<tr>
<td>Classification</td>
<td>N/A</td>
</tr>
<tr>
<td>Definition</td>
<td>An undisputed charge card account balance that is unpaid for more than 61 days past the statement date.</td>
</tr>
<tr>
<td>Examples</td>
<td>N/A</td>
</tr>
</tbody>
</table>

**NOTE:** OMB Quarterly Reporting includes delinquency as reportable “Misuse” until Interim Guidance on GPC Disciplinary Category Definitions take effect on 1 October 2017, at which point it will be a stand-alone violations category.
REPORTABLE VIOLATION CATEGORY DETERMINATION FRAMEWORK

• Ensure Violation Documented in PCOLS DM or Navy PAT
• Include in OMB Submissions
  - Validate Attachment A & C Totals against Attachments B & C details

Fraud by a Government GPC Program Official

Violation Identified

Internal Fraud?

Report as Fraud

Yes

No

Intentional?

Report as Abuse

Yes

No

Report as Misuse

NOTE: Excludes Delinquency
OMB Reporting Guidance

Overview
• OMB M-17-26, “Reducing Burden for Federal Agencies by Rescinding and Modifying OMB Memoranda,” of 15 June 2017
  – Makes Quarterly Statistical Reporting “optional and not required to be submitted to OMB”; **BUT**
  – Still requires DoD “to maintain statistical and narrative information for their own use and management of their charge card program”

• DPAP will continue to collect DoD Guidance Attachments A & B data, and will maintain data in-house
  – No change to data required from DoD Components

• Memo makes no changes to Semi-Annual Violations Reporting data collection and submission to OMB
  – No change to data required from DoD Components
### OMB Quarterly & Semi-Annual Reporting Suspense Dates

#### Quarterly Reporting

<table>
<thead>
<tr>
<th>Quarter</th>
<th>Reporting Period</th>
<th>Components Submit to DPAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Q1</td>
<td>Oct - Dec</td>
<td>15-Jan</td>
</tr>
<tr>
<td>Q2</td>
<td>Jan - Mar</td>
<td>15-Apr</td>
</tr>
<tr>
<td>Q3</td>
<td>Apr - Jun</td>
<td>15-Jul</td>
</tr>
<tr>
<td>Q4</td>
<td>Jul - Sep</td>
<td>15-Oct</td>
</tr>
</tbody>
</table>

#### Semi-Annual Reporting

<table>
<thead>
<tr>
<th>Semi-Annual Period</th>
<th>Reporting Period</th>
<th>Components Submit to DPAP</th>
<th>DPAP Submits to OMB</th>
</tr>
</thead>
<tbody>
<tr>
<td>Semi-Annual 1</td>
<td>Oct - Mar</td>
<td>15-Jul</td>
<td>31-Jul</td>
</tr>
<tr>
<td>Semi-Annual 2</td>
<td>Apr - Sep</td>
<td>15-Jan</td>
<td>31-Jan</td>
</tr>
</tbody>
</table>
• Guidance Attachments:
  A. Quarterly Statistical Reporting Spreadsheet
  B. Quarterly Statistical Reporting Transaction Traceability Matrix
  C. Semi-Annual Violations Report
  D. Semi-Annual Violations Reporting Transaction Traceability Matrix

• Attachments B and D required to:
  – Support program oversight
  – Provide data auditability
Quarterly Reporting Guidance
• Released for use prior to FY17 Q1 Statistical Reporting
• Provides detailed reporting instructions
• DPAP to gather most of Attachment A’s 19 reportable data elements from system generated data, except:
  – Army, USAF and Defense Agencies input required on 5 reportable data elements
  – Navy CCPMD provides a single submission to DPAP excluding:
    • Percentage of Employees that are Cardholders (Column D)
    • Percentage of Potential Refunds Earned (Column H)
  – DPAP to calculate and report (no Component input required):
    • Percentage of Employees that are Cardholders (Col D)
    • Percentage of Potential Refunds Earned (Col H)
## ATTACHMENT A – REPORTABLE DATA ELEMENTS REQUIRED FROM COMPONENTS

<table>
<thead>
<tr>
<th>Column</th>
<th>Data Required</th>
</tr>
</thead>
<tbody>
<tr>
<td>I</td>
<td>Number of Cases Reported to the Office of Inspector General or A/OPC for Possible Card Misuse and/or Abuse</td>
</tr>
<tr>
<td>J</td>
<td>Number of Administrative and/or Disciplinary Actions Taken for Card Misuse, Including Delinquency (if known)</td>
</tr>
<tr>
<td>K</td>
<td>Number of Administrative and/or Disciplinary Actions Taken for Convenience Check Misuse</td>
</tr>
<tr>
<td>N</td>
<td>Number of Purchase Cardholders with Contracting Warrants above the Micro-Purchase Threshold of $3,500</td>
</tr>
<tr>
<td>O</td>
<td>Number of Purchase Cardholders with Transaction Limits Greater than the Micro-Purchase Threshold of $3,500 who do not hold contracting warrants</td>
</tr>
</tbody>
</table>

**NOTE:**
- Delinquencies are reported as “Misuse” in Column J
- Administrative actions are those actions taken by an A/OPC
- Disciplinary actions are those actions taken by a Supervisor
• Requires that all Open PCOLS Data Mining Cases (New or Under A/BO Review) be included on Attachments A and B
  – DM Cases not dispositioned by end of the reporting period have been “reported to A/OPC for possible card misuse and/or abuse”
  – DPAP strongly recommends closing all DM Cases prior to end of quarterly reporting period
  – Some cases may span quarterly reporting, but whenever possible, close cases by end of quarter

• PCOLS Risk Assessment Dashboard can be used to collect the data required to complete Attachment B
  – Once transaction is found in RAD Control 5.4, click on Transaction Amount to display Data Mining Case details
• Every violation reported on Attachment A (Columns I-K), must have:
  
  – A corresponding entry (i.e., row) providing the transaction details requested on Attachment B
  
  – The A/OPC’s review results documented in PCOLS Data Mining
     
  • If flagged by PCOLS DM - A/OPC initiates and completes an “Independent Review” to document their input
  
  • If otherwise identified - A/OPC “Self Initiates” a case for A/BO review, then initiates and completes an “Independent Review”

• Navy A/OPC’s - Follow Service Review Guidance
Components acting as Servicing Agencies (SA) (i.e., those Components who have issued GPCs for use by other DoD Components) are required to ensure Requesting Agency’s (RA) data, including violations, are reported separately.

Attachment B Example:

<table>
<thead>
<tr>
<th>Column</th>
<th>I</th>
<th>J</th>
<th>K</th>
<th>N</th>
<th>O</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agency</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of Cases Reported to the Agency IG or A/OPC for Possible Card Misuse and/or Abuse</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of Administrative and/or Disciplinary Actions Taken for Card Misuse, Including Delinquency (if known)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of Administrative and/or Disciplinary Actions Taken for Convenience Check Misuse</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of purchase cardholders with contracting warrants with transaction limits greater than the micro-purchase threshold of $3,500 who do not hold contracting warrants.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**NAVY & USMC**

**AIR FORCE**

**ARMY**

<table>
<thead>
<tr>
<th>DLA (SA) *not including Requesting Agencies</th>
<th>1</th>
<th>34</th>
<th>55</th>
<th>824</th>
<th>550</th>
</tr>
</thead>
<tbody>
<tr>
<td>DFGA (Requesting Agency)</td>
<td>2</td>
<td>20</td>
<td>23</td>
<td>354</td>
<td>119</td>
</tr>
<tr>
<td>DXYZ (Requesting Agency)</td>
<td>1</td>
<td>8</td>
<td>2</td>
<td>129</td>
<td>68</td>
</tr>
<tr>
<td><strong>DLA Total</strong></td>
<td>4</td>
<td>62</td>
<td>80</td>
<td>1,307</td>
<td>737</td>
</tr>
</tbody>
</table>

DoD TOTALS
Semi-Annual Reporting Guidance
• Released for use prior to FY17 Q1-Q2 Semi-Annual Reporting
• Provides detailed reporting instructions
• Requires that every violation reported on Attachment C has:
  – A corresponding entry (i.e., row) providing the transaction details requested on Attachment D
  – The A/OPC’s review results documented in PCOLS Data Mining
**LINK BETWEEN QUARTERLY AND SEMI-ANNUAL VIOLATIONS REPORTING**

<table>
<thead>
<tr>
<th>QUARTERLY VIOLATIONS REPORTING</th>
<th>SEMI-ANNUAL VIOLATIONS REPORTING</th>
</tr>
</thead>
<tbody>
<tr>
<td>Column I - Number of Cases</td>
<td>CONFIRMED</td>
</tr>
<tr>
<td>Reported to the Office of Inspector General or A/OPC for <strong>POSSIBLE</strong> Card Misuse and/or Abuse</td>
<td>Section I, <strong>CONFIRMED</strong> violations involving fraud, misuse, abuse and delinquency of purchase or integrated card, following the completion of agency or IG review, and Section II, total number of all adverse personnel actions taken in response to each reportable violation</td>
</tr>
<tr>
<td>Column J - Number of Administrative and/or Disciplinary Actions Taken for Card Misuse, Including Delinquency</td>
<td><strong>ALL</strong></td>
</tr>
<tr>
<td>Column K - Number of Administrative and/or Disciplinary Actions Taken for Convenience Check Misuse</td>
<td><strong>ALL</strong></td>
</tr>
</tbody>
</table>

1. Complete both applicable Quarterly Statistical Reports
2. Copy Quarterly Attachment B data to Semi-Annual Attachment D
3. Remove **POSSIBLE** violations identified to DoDIG that are not **CONFIRMED** from Attachment D
4. Populate Columns T, U, V, W and X
Section I - Only report **CONFIRMED** violations (following completion of agency or IG review) included on the Quarterly Reports

Section II - Report **ALL** the adverse personnel actions included on the Quarterly Reports

Attachment C Example:

<table>
<thead>
<tr>
<th>(I) Confirmed violations involving fraud, misuse, abuse and delinquency of purchase or integrated card, following the completion of agency or IG review</th>
<th>Army</th>
<th>Air Force</th>
<th>Navy</th>
<th>ODAs</th>
<th>DoD Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>1a Fraud</td>
<td>2</td>
<td></td>
<td></td>
<td></td>
<td>2</td>
</tr>
<tr>
<td>1b Misuse</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td>1</td>
</tr>
<tr>
<td>1c Abuse</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td>1</td>
</tr>
<tr>
<td>1d Delinquency</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td>1</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>(II) Total Number of all adverse personnel actions including Documentation of Counseling, Demotion, Reprimand, Suspension, Removal, and Other taken in response to each reportable violations involving fraud, misuse, abuse and delinquency of purchase or integrated card.</th>
<th>Army</th>
<th>Air Force</th>
<th>Navy</th>
<th>ODAs</th>
<th>DoD Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>2a Fraud</td>
<td>4</td>
<td></td>
<td></td>
<td></td>
<td>4</td>
</tr>
<tr>
<td>2b Misuse</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td>1</td>
</tr>
<tr>
<td>2c Abuse</td>
<td>2</td>
<td></td>
<td></td>
<td></td>
<td>2</td>
</tr>
<tr>
<td>2d Delinquency</td>
<td>0</td>
<td></td>
<td></td>
<td></td>
<td>0</td>
</tr>
</tbody>
</table>
Components acting as SAs are required to ensure RA data, including violations, are reported separately.

Attachment C Example:

<table>
<thead>
<tr>
<th>(I) Confirmed violations involving fraud, misuse, abuse and delinquency of purchase or integrated card, following the completion of agency or IG review</th>
<th>DLA (SA)*</th>
<th>DFGA (RA)**</th>
<th>DXYZ (RA)**</th>
<th>DLA Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>1a Fraud</td>
<td>1</td>
<td>0</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>1b Misuse</td>
<td>3</td>
<td>3</td>
<td>1</td>
<td>7</td>
</tr>
<tr>
<td>1c Abuse</td>
<td>4</td>
<td>3</td>
<td>2</td>
<td>9</td>
</tr>
<tr>
<td>1d Delinquency</td>
<td>1</td>
<td>1</td>
<td>8</td>
<td>10</td>
</tr>
</tbody>
</table>

(II) Total Number of all adverse personnel actions including Documentation of Counseling, Demotion, Reprimand, Suspension, Removal, and Other taken in response to each reportable violations involving fraud, misuse, abuse and delinquency of purchase or integrated card.

| 2a Fraud | 3 | 0 | 1 | 4 |
| 2b Misuse | 8 | 3 | 1 | 12 |
| 2c Abuse | 5 | 6 | 2 | 13 |
| 2d Delinquency | 2 | 0 | 8 | 10 |

* Servicing Agency Only
** Requesting Agency Only
The following shows the unique columns included in Attachment D

- Columns A – S of Attachment D are identical to those columns in Attachment B

<table>
<thead>
<tr>
<th>T</th>
<th>U</th>
<th>V</th>
<th>W</th>
<th>X</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Confirmed violations involving misuse of purchase or integrated card, following the completion of agency or IG review (I)</strong></td>
<td><strong>Number of all adverse personnel actions, punishment, or other actions taken in response to each reportable violations involving misuse of purchase or integrated card (II)</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fraud</td>
<td>Misuse</td>
<td>Abuse</td>
<td>Delinquency</td>
<td>Count including: Documentation of Counseling, Demotion, Reprimand, Suspension, Removal, and Other</td>
</tr>
<tr>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td>3</td>
</tr>
<tr>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td>1</td>
</tr>
<tr>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td>1</td>
</tr>
<tr>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td>2</td>
</tr>
<tr>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td>0</td>
</tr>
</tbody>
</table>
QUESTIONS?

BACK UP
This email provides additional information related to the Attachment (1) Class Deviation dated 17 July 2017. This Class Deviation raised the Micro-Purchase Threshold (MPT) for DoD acquisitions of supplies or services funded by DoD appropriations to $5,000. It also raised the MPT for DoD acquisitions of supplies or services for (i) basic research programs; and (ii) for activities of the DoD science and technology reinvention laboratories (STRLs) to $10,000.

Please be advised that prior to issuing any new Delegation of Procurement Authority Letter and increasing any Cardholder’s (CH) single purchase limit above $3,500, Governmentwide Commercial Purchase Card (GPC) Agency/Organization Program Coordinators (A/OPCs), Resource Managers (RMs) and other individuals responsible for management and oversight of GPC programs must ensure:

1. GPC Cardholders authorized in writing in accordance with FAR 1.603-3(b) are not Contracting Officers.
2. FAR 8.602 authorizes Contracting Officers to perform market research and sign a written determination that an FPI item is not comparable to supplies available from the private sector that best meet the Government’s needs in terms of price, quality, and time of delivery.
3. FAR 8.605 exempts purchases with a Contracting Officer’s written determination and those valued below $3,500 from mandatory FPI purchase requirements.
4. FAR 19.502-2 requires that each acquisition of supplies or services that has an anticipated dollar value exceeding $3,500 ($20,000 for acquisitions as described in 13.201(g)(1)), but not over $150,000 ($750,000 for acquisitions described in paragraph (1) (i) of the simplified acquisition threshold definition at 2.101), be automatically reserved exclusively for small business concerns and be set aside for small business unless the contracting officer determines there is not a reasonable expectation of obtaining offers from two or more responsible small business concerns that are competitive in terms of market prices, quality, and delivery.
5. FAR 13.202 states micro-purchases shall be distributed equitably among qualified suppliers and that micro-purchases may be awarded without soliciting competitive quotations if the contracting officer or CH considers the price to be reasonable (i.e., the CH has recently purchased the item on a competitive basis [reviewed 3 quotes] and does not suspect or have information indicating the price may not be reasonable).
6. Small Business Size determinations are made in accordance with 19.303 using North American Industry Classification System NAICS codes in the System for Award Management (SAM).
“Micro-purchase” means an acquisition of supplies or services using simplified acquisition procedures, the aggregate amount of which does not exceed the micro-purchase threshold.

“Micro-purchase threshold” means $3,500, except it means—

(1) For acquisitions of construction subject to 40 U.S.C. chapter 31, subchapter IV, Wage Rate Requirements (Construction), $2,000;

(2) For acquisitions of services subject to 41 U.S.C. chapter 67, Service Contract Labor Standards, $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 40 U.S.C. chapter 31, subchapter IV, Wage Rate Requirements (Construction) (41 U.S.C. 1903)—

(i) $20,000 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.

No Change to Construction, Service Contract and Contingency Thresholds
(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.
(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’.
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](https://www.dodpmi.mil/dod≡/documents/FMR/Volume_10/Chapter_12/sec120327.pdf), and [DoDI 1400.25, Volume 410](https://www.dodpmi.mil/dod≡/documents/DoDI/1400.25/Volume_410.pdf).

**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)](https://www.govinfo.gov/content/pkg/CFR-2020-title5-vol1/pdf/CFR-2020-title5-vol1-part410.pdf), 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](https://www.dodpmi.mil/dod≡/documents/DoDI/1400.25/Volume_410.pdf) 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](https://www.dodpmi.mil/dod≡/documents/FMR/Volume_10/Chapter_12/sec120327.pdf). 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.**
PCOLS
• DMDC has new upper management, is under a Cyber Hardening Campaign, performing JBOSS migration, and migrating to SAS reporting
• DM impacted by security, maintenance and other high priority updates
• Since the last GSA Training Forum, requirements definition has progressed for a number of ECPs, including:
  – Data Mining
    • 73: Add Reason for Self-Initiation; 17: Update the case manager statistical reporting; 85 and 75: Add A/OPC Surveillance Review feature
  – AIM
    • 58: Automated Appointments; 88: System Interface with FedMall; 92: Configure frequency and notifications for manually entered courses; 39: Configure frequency and notifications for existing DAU tracked courses; 70: Other PCOLS Training improvements
  – Reporting
    • 91: More robust reporting on training