



OFFICE OF THE UNDER SECRETARY OF DEFENSE

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ACQUISITION
AND SUSTAINMENT

MEMORANDUM FOR COMMANDER, UNITED STATES CYBER
COMMAND (ATTN: ACQUISITION EXECUTIVE)
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
(PROCUREMENT)
DEPUTY ASSISTANT SECRETARY OF THE AIR FORCE
(CONTRACTING)
DEFENSE AGENCY AND DOD FIELD ACTIVITY DIRECTORS

SUBJECT: Governmentwide Commercial Purchase Card Guidance Related to Recording Transactions involving National Interest Action Codes and Emergency Acquisition Authorities (GPC 2021-1)

References: (1) Defense Pricing and Contracting Memorandum, "Emergency Acquisition Flexibilities – Special Emergency Procurement Authority and Head of the Contracting Activity Delegated Authority," dated October 10, 2020
(2) DPC Memorandum, "Department of Defense SmartPay®3 (SP3) Governmentwide Commercial Purchase Card Policies, Procedures and Tools – SP3 Transition Memorandum #6," dated April 18, 2019
(3) *DoD Government Charge Card Guidebook for Establishing and Managing Purchase, Travel, and Fuel Card Programs*, dated June 3, 2020, incorporated into the Defense Federal Acquisition Regulation Supplement at Part 213.301

This memo directs Heads of Contracting Activities (HCAs) to issue component-level Governmentwide Commercial Purchase Card (GPC) guidance for recording information when National Interest Action (NIA) Codes are issued for the following: contingency operations, declared emergency or major disasters, defense or recovery from certain events, humanitarian or peacekeeping operations, or international disaster assistance (hereafter referred to as "applicable operations"). HCAs must also issue guidance on retaining transaction determinations to use elevated acquisition thresholds in support of applicable operations.

In accordance with Federal Acquisition Regulation (FAR) subpart 18.001, Defense FAR Supplement subpart 218.270, and as outlined in Reference 1, HCAs have the delegated authority to authorize emergency acquisition flexibilities; no notification from Defense Pricing and Contracting is necessary for HCAs to implement these flexibilities.

Reference 2, Attachment 1, paragraph II. C. mandates that GPC Cardholders (CHs) maintain the purchase log in U.S. Bank's Electronic Access System using Access On Line

(AxOL) Order Management, and specifies the mandatory enterprise purchase log fields. HCAs are directed to issue GPC component-level guidance requiring CHs to enter NIA Codes, when assigned, in AxOL Order Management for transactions made in support of applicable operations as follows:

- a. Components that create manual Access Online orders must use the Contingency Operations field.
- b. Components that receive editable Access Online eOrders must use the Contingency Operations field.
- c. Components that receive Access Online eOrders that are not editable must use the Transaction Comments field.
- d. In the event the NIA Code needs to be entered after the fact, CHs must enter the NIA manually in the Transaction Comments field.

To meet the requirements of FAR subpart 2.101, HCAs must ensure component-level GPC guidance directs CHs to retain all GPC transaction determinations to use elevated acquisition thresholds in support of each such operation. Transaction supporting data is to be logged using AxOL (Transaction Management – Attachments).

HCAs at Department of Defense Components granted a waiver from the requirement to use the issuing bank's Electronic Access System to create their purchase log and/or retain transaction supporting data must issue component-level guidance that requires timely capture of NIA Codes in the CH's purchase log, and retention of all FAR 2.101 required GPC transaction determinations with CH's transaction supporting data.

NIA Codes can be found in the Federal Procurement Data System at <https://fpds.gov>. Note that assignment of NIA Codes is rare; not all disasters or contingency operations will be assigned an NIA Code.

Should you have questions, my point of contact is Ms. Sheila McGlynn at sheila.a.mcglynn.civ@mail.mil or 703-697-4402.

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