Order

U.S. DEPARTMENT OF TRANSPORTATION

Federal Highway Administration

Subject
Government Purchase Card Program

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Par.

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1. **What is the purpose of this directive?** The purpose of this directive is to prescribe the policy, responsibilities, and procedures governing the implementation and management of the Government Purchase Card Program within the Federal Highway Administration (FHWA). This directive is to be used in conjunction with the FHWA Purchase Card Manual, available on StaffNet.

2. **What is the scope of this directive?** The provisions of this directive are applicable to all FHWA participants in the Government Purchase Card Program, including Purchase Cardholders, Approving Officials (AO), and Purchase Card Program Coordinators (PCPC).

3. **Does this directive cancel existing FHWA directives?** Yes. This directive cancels FHWA Order 2770.3A, Implementation of the Governmentwide Commercial Credit Card Service Program, dated October 21, 1994, and Change 1 to that Order, dated December 15, 1997.

4. **What is the background of this directive?** The FHWA Order 2770.3A was issued to govern the implementation and management of the Government Purchase Card Program within FHWA. Since 1989, the General Services Administration (GSA) has administered the Federal Government's SmartPay Government Purchase Card Program. The Government Purchase Card Program was created as a way for agencies to streamline Federal acquisition processes

by providing a low-cost and efficient vehicle for obtaining goods and services directly from vendors. The Federal Acquisition Regulation (FAR) designated the purchase card as the preferred method for micro-purchases. The FAR defines a micro-purchase as any purchase under $3,000. In addition, part 13 of the FAR, Simplified Acquisition Procedures, establishes criteria for using the purchase card to place orders and make payments.

5. **What authorities govern this directive?**

   a. Government Charge Card Abuse Prevention Act of 2012, Public Law 112-194, issued October 5, 2012

   b. Federal Acquisition Regulation, issued July 1, 2012

   c. OMB Circular A-123, Appendix B, Revised, Improving the Management of Government Charge Card Programs, issued January 15, 2009

   d. GSA Federal Supply Service, Contract Guide GS-23F-98002, dated November 1998

   e. Treasury Financial Manual (TFM), Volume I, Part 4, Chapter 4500, Government Credit Cards

   f. Transportation Acquisition Manual (TAM), Subchapter 1213, Appendix B, Department of Transportation (DOT) Purchase/Credit Card Program

   g. FHWA Purchase Card Manual, issued October 2008

   h. Acquisition Procedural Memorandum (APM), APM-024-A, Validation and Approval of Purchase Card Transactions

   i. APM 014-A, Processing Convenience Checks for FHWA Offices

6. **What definitions are used in this directive?**

   a. **Government Purchase Card Program.** This program was established by GSA to provide charge cards to Agencies and Departments within the U.S. Government. The Government Purchase Card Program streamlines the procurement and payment process by reducing the paperwork involved with the issuance of the Standard Form 44, Purchase Order.

   b. **Head of the Contracting Activity (HCA).** This is the person responsible for the overall management of the Washington Headquarters and regional acquisition programs. In FHWA, the HCA is the Executive Director.

   c. **Chief of the Contracting Office (COCO).** This is the person responsible for overall management of a contracting office.

d. **Agency Program Coordinator (APC).** This is the employee designated by the COCO to coordinate the Purchase Card Program for the entire FHWA. This position is located in the Acquisition Planning and Policy Division within the Office of Acquisition Management (HAAM). An Alternate Agency Program Coordinator may be designated as well.

e. **Approving Official (AO).** This is the FHWA employee who has the responsibility for one or more Government Purchase Cardholders under his or her purview. The AO determines if Cardholders' purchases are made in accordance with the applicable regulations, policies, and procedures. Typically, the AO would be within the supervisory chain of the Purchase Cardholder. The criteria for designating AOs are listed in paragraph 7g of this directive.

f. **Continuity of Operations Plan (COOP).** The COOP is a contingency plan to ensure that the capability exists to continue essential functions across a wide range of potential emergencies, involving localized acts of nature, accidents, and technological and/or attack related emergencies.

g. **Delegation of Procurement Authority (DPA).** The DPA is the document issued by the COCO granting specific procurement limits to the individual employee who will be issued a purchase card. The issuance of the DPA can be delegated to another Contracting Officer within HAAM. This DPA does not substitute as a warrant issued under FAR Part 1.603.

h. **Electronic Banking System.** The FHWA's contract with the bank that manages the Government Purchase Card Program allows Purchase Cardholders and AOs to manage their respective accounts online in a secured environment.

(1) All Purchase Cardholders must use the applicable electronic banking system to "approve" purchases listed on their monthly statement.

(2) All AOs must use the applicable electronic banking system to "final approve" the Purchase Cardholder's purchases listed on the Purchase Cardholder's monthly statement.

i. **Inactive Accounts.** Accounts without any transactions within the preceding 12-month period are considered "inactive."

j. **Micro-purchase.** Under FAR, "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.

k. **Monthly credit limit.** This is the maximum dollar amount a cardholder may expend over a 30-day period. In FHWA, this amount is determined by the Purchase Cardholder's AO and approved by the COCO, or his or her designee, ensuring the amount does not exceed statutory authority. The amount is stated in the cardholder's DPA.

l. **Non-expendable property.** Property that has a normal life of more than 1 year, is not consumed in use, is either considered sensitive or has an acquisition cost of $300 or more. Examples include cellular telephones, furniture, televisions, cameras, facsimile equipment, video equipment, computer hardware, and software, or any associated maintenance and/or local training.

m. **Purchase Card Program Coordinator (PCPC).** The PCPCs are appointed by the applicable COCO or Federal Lands Highway Division Office Engineer to coordinate the Purchase Card Program for the Federal Lands Highway Division Offices and act as the primary liaison between the Federal Lands Highway Division Office, HAAM, and the APC in matters related to the Government Purchase Card Program. There is a PCPC assigned to each of the Federal Lands Highway Division Offices (Eastern, Central, and Western).

n. **Purchase Cardholder.** This is the individual government employee within FHWA to whom a written DPA has been issued by the COCO, or his or her designee, granting the Purchase Cardholder the authority to use a government purchase card. The criteria for Purchase Cardholders are listed in paragraph 7f of this directive.

o. **Single Purchase Limit.** This is the spending limit imposed on a cardholder for an individual purchase card transaction. The amount established is stated in the individual cardholder's DPA.

p. **Talent Management System (TMS).** The TMS is the U.S. Department of Transportation's (DOT) online learning management system. The TMS allows employees to take self-paced online training, search and register for training modules, and view training histories.

q. **Transportation Acquisition Manual (TAM).** The TAM contains the DOT policies and procedures relating to procurement and the Government Purchase Card Program.

r. **Warranted Personnel.** These are FHWA employees who have been issued a formal appointment of contracting authority by the COCO in accordance with FAR Part 1.603.

7. **What is FHWA's purchase card policy?**

a. **General policy.** The policy of FHWA is to comply with all related directives and regulations in administering all requirements regarding the Government Purchase Card Program. The DOT policies and procedures relating to the Government Purchase Card Program are contained in the TAM, Subchapter 1213, Appendix B.

b. **Micro-purchases Threshold.** The FHWA employees will make use of the purchase card for micro-purchases ($3,000 or less, per 48 CFR 2.101) throughout the entire Agency. The Purchase Card is also the preferred method for acquiring all training services ($3,000 or less). The micro-purchase threshold is $3,000 except:

(1) For acquisitions of construction subject to the Davis-Bacon Act (41 U.S.C. 428a), in which the micro-purchase threshold is $2,000;

(2) For acquisition of services subject to the Service Contract Act, in which the micro-purchase threshold is $2,500; or

(3) For acquisitions of supplies or services as determined by the head of the Agency when used to support a contingency operation or to facilitate defense against recovery from nuclear, biological, chemical, or radiological attack, as described in the FAR Part 13.201(g)(1), except for construction subject to the Davis-Bacon Act (41 U.S.C. 428a), in which the micro-purchase threshold is:

(a) $15,000 in the case of any contract to be awarded and performed—or purchase to be made—inside the United States; or

(b) $30,000 in the case of any contract to be awarded and performed—or purchase to be made—outside the United States (48 CFR 2.101).

c. **Separation of duties.** "Responsibilities of the HCA, [APC], AOs, Cardholders, and finance personnel shall not overlap. A separation of duties shall exist among the key participants of the program to ensure the program's integrity. There must be no conflict of interest. For example, cardholders should never be AOs for their supervisors. **A single individual should not buy, receive, and certify funds availability for purchases [for example, the Purchase Cardholder should not receive the goods that the purchase cardholder purchased; another member of the staff must receive the goods and acknowledge receipt of goods]**. Assignment of duties such as authorizing, approving and recording transactions, receiving assets, approving cardholders statements, making payments, certifying funds, reviewing or auditing should be assigned to separate individuals to the greatest extent possible." TAM, Subchapter 1213, Appendix B, Part VI.

d. **Purchase Cardholder Authorization Limits.**

(1) **Monthly credit limit.** The monthly credit limit is determined by the Purchase Cardholder's AO and approved by the COCO or his or her designee. Within FHWA, the monthly credit limit shall not exceed:

(a) $25,000, the maximum monthly limit for non-warranted personnel, unless specifically authorized by the HCA; or

(b) $100,000, the maximum monthly limit for warranted personnel.

(2) **Single purchase limit.** The single purchase limit is determined by the Purchase Cardholder's AO and approved by the COCO or his or her designee. The COCO may establish a single purchase limit less than or equal to the maximum limits. Within FHWA, the single purchase limit shall not exceed:

(a) $3,000, the maximum single purchase limit for non-warranted personnel, unless specifically authorized by the HCA; or

(b) $25,000, the maximum single purchase limit for warranted personnel.

e. **Establishing purchase card accounts.** To establish an FHWA Purchase Cardholder account, the following steps must be taken:

(1) The applicant must complete the required "initial" purchase card training in the TMS.

(2) The PCPC or the AO for the applicant must fully complete the following account set-up forms:

(a) The Purchase Cardholder Application Form (must include the AO's name).

(b) The Approving Official/Purchase Cardholder Certification Form (must be signed by both the AO and the Cardholder).

(3) Purchase Cardholders may request authority to process convenience checks on their initial application or later if the need arises. The APC determines if the prospective Purchase Cardholder is granted the authority to process convenience checks.

(a) Upon request by the APC, Federal Lands Highway Division Office Purchase Cardholders who are requesting the authority to process convenience checks must have either their PCPC or their AO provide written justification to the APC.

(b) Upon request by the APC, written justification for the use of convenience checks must be provided by the AOs for Purchase Cardholders from Headquarters Program Offices, the Resource Center, and Federal-aid highway Division Offices.

(c) The written justification provided by the PCPC or the AO to the APC must include a listing of products and/or services typically ordered and associated vendors that do not accept government purchase cards for such items and services. The supporting documentation is subject to verification by APC.

(4) The AO or PCPC must forward the Purchase Cardholder application form to the APC accompanied by the following:

(a) An Approving Official/Cardholder Certification Form signed by the Purchase Cardholder and the AO stating they understand their responsibilities;

(b) A completed training certificate for the Purchase Cardholder from the FHWA Purchase Card Training Module in TMS; and

(c) A copy of the Contracting Officer's warrant for warranted personnel.

(5) A DPA will be issued by the COCO or their designee through the APC, if the application is approved.

(6) The APC will establish a purchase card account for the applicant by entering the information into the applicable an online electronic banking system for issuance of the purchase card.

(a) The purchase card should be delivered to the Purchase Cardholder within 10 days from the date the account was established in the applicable electronic banking system.

(b) If a Purchase Cardholder does not receive the purchase card within 10 days from the date the purchase card account was established:

1 Purchase Cardholders from a Headquarters Program Office, the Resource Center, an Administrative Service Team, or a Federal-aid highway Division Office should notify their AO and the APC that the purchase card was lost or stolen.

2 Purchase Cardholders from a Federal Lands Highway Division should notify their AO and their PCPC that the purchase card was lost or stolen; in turn the applicable Federal Lands PCPC will notify the APC that the purchase card was lost or stolen.

(7) Once the purchase card account is created in the online electronic banking system, the APC will:

(a) Forward the DPA to the Purchase Cardholder;

(b) Mail instructions to the Purchase Cardholder that detail how to activate the purchase card upon receipt;

(c) Provide information by email on ordering supplies from the 15 Blanket Purchase Agreement (BPA) vendors that were awarded contracts through the Federal Strategic Sourcing Initiative;

(d) Provide information via email on how to register in the applicable electronic banking system—all Purchase Cardholders must register in the applicable electronic banking system in order to review, validate, and approve their respective purchase transactions;

(e) Provide online training opportunities for Purchase Cardholders in the Web-Based Training site that is managed and maintained by the electronic banking system; and

(f) Upon receipt of the purchase card, the Purchase Cardholder must follow the instructions listed on the activation letter that was received with the DPA.

f. **PCPC.**

(1) FHWA PCPCs are designated by the Federal Lands Highway Division Engineers.

(2) To create or update an account for a PCPC, the following documentation is needed:

(a) An email from an authorized official nominating the prospective PCPC—a PCPC can also be designated as an alternate AO (the email should also include the effective date and the reporting hierarchies; if the PCPC is also an alternate AO, then the names of the cardholders that will be under the alternate AO's purview must be included);

(b) A completed FHWA Purchase Card Program Training Certificate for the prospective PCPC; and

(c) If the PCPC will also be serving as an alternate AO, they will also need an Approving Official/Purchase Cardholder Certification Form signed by the PCPC and the Cardholder.

g. **AOs.**

(1) The AOs are typically supervisors and are generally co-located with the purchase cardholders. The AOs must be a GS-09 or higher. If due to limited staffing, an office must appoint an AO that is less than a GS-09, then the office must request a waiver from the APC for the AO to be less than a GS-09 on an interim basis; this interim period can last no longer than 6 months.

(2) The FHWA AOs are designated by the Associate Administrators, the Director of Field Services, the Chief Financial Officer, the Chief Counsel, the Director of Innovative Program Delivery, the Director of Technical Services, the Director of the Resource Center, Federal Lands Highway Division Engineers, or Division Administrators.

(a) If the Director, Division Administrator, or Head of the Office is not available, the AO can be designated by their Deputy.

(b) If a Federal Lands Division Engineer is not available, the AO can be nominated by the Division Engineer's designee.

(3) To create or update an account for an AO or alternate AO, the following documentation is needed:

(a) An email from an authorized official nominating the prospective AO or prospective alternate AO (the email should also include the effective date, the reporting hierarchy, and the name of the Purchase Cardholders that will be under the AO's or alternate AO's purview);

(b) A completed FHWA Purchase Card Training Certificate for the prospective AO or prospective alternate AO; and

(c) An Approving Official/Cardholder Certification Form signed by both the Cardholder and either the prospective AO or prospective alternate AO, whichever is applicable.

h. **Required Purchase Card Program training.**

(1) **Initial purchase card training.**

(a) The purchase card training is located in TMS.

(b) Each prospective Purchase Cardholder and AO must first complete FHWA Purchase Card Training in TMS.

1 In the Federal Lands Highway Division, both Purchase Cardholders and AOs must print the certificate that is displayed on screen after completion and then:

a Forward a copy of the certificate to PCPC and the PCPC in turn will forward copy to APC; and

b Maintain a copy with the Purchase Cardholder's purchase card files.

2 In the Headquarters Program Offices, the Resource Center, and the Federal-aid highway Division Offices, both Purchase Cardholders and AOs must print the certificate that is displayed on screen after completion and then:

a Forward a copy of the certificate to the APC; and

b Maintain a copy with the Purchase Cardholder's purchase card files.

(2) **Refresher purchase card training.**

(a) Purchase Cardholders and AOs are required to take refresher training on an annual basis.

(b) Refresher training may be accomplished by accessing the Government Purchase Card Program training module in TMS.

1 In the Federal Lands Highway Division, both

Purchase Cardholders and AOs must print the certificate that is displayed on screen after completion and then:

a Forward a copy of the certificate to PCPC and the PCPC in turn will forward copy to the APC; and

b Maintain a copy with the Purchase Cardholder's purchase card files.

2 In the Headquarters Program Offices, the Resource Center and the Federal-aid highway Division Offices, both Purchase Cardholders and AOs must print the certificate that is displayed on screen after completion and then:

a Forward a copy of the certificate to the APC; and

b Maintain a copy with the Purchase Cardholder's purchase card files.

i. **Rules governing the use of the purchase card.**

(1) The individual whose name appears on the purchase card is the only person authorized to use the purchase card.

(2) Procurement Request (Authority to Spend Funds). The use of an individual Procurement Request (PR) for each purchase card transaction is required. The PR provides the authority to obligate funds—justifications and approvals are required—and shows the evidence of funds (FAR 4.803).

(3) In accordance with 48 CFR Part 13.301, purchase cards can be used to:

(a) Make micro-purchases ($3.000 or less);

(b) Place tasks or delivery orders, if authorized in the basic contract, basic ordering agreement, or BPA; and

(c) Make payments when the vendor/merchant agrees to accept payment by purchase card.

(4) Purchase Cardholders who are making purchases in excess of the micro-purchase threshold ($3,000) must:

(a) Possess a DPA in excess of $3,000;

(b) Possess a Contracting Officer's Warrant; and

(c) Follow all appropriate requirements as defined in 48 CFR Part 13, including notice, competition, and documentation.

(5) Purchase cards cannot substitute for the acquisition process.

(6) Purchase cards may be used as a payment mechanism, but not a contracting mechanism.

(7) Each FHWA office is authorized to make monthly payments with the government purchase card providing the total purchase does not exceed the single purchase limit on the cardholder's DPA:

(a) For non-warranted Purchase Cardholders, the monthly payment cannot exceed the micro-purchase threshold ($3,000) or the Purchase Cardholder's single purchase limit as stated on the DPA, if the DPA single purchase limit is less than the micro-purchase threshold;

(b) For warranted Purchase Cardholders, the monthly payment cannot exceed the single purchase limit on the purchase cardholder's DPA;

(c) For any procurement with an aggregate total of $3,000 or more for an annual contract, a Purchase Order must be created in the Procurement Request Information System Management (PRISM). The purchase card may still be used to make the payment if the monthly payment does not exceed the single purchase limit on the cardholder's DPA;

(d) For non-warranted Purchase Cardholders with any procurement with an aggregate total of $3,000 or more for a single purchase, a Purchase Order must be used.

(8) A single purchase card transaction may consist of the purchase of a number of individual items, the sum of which (including any shipping costs) may not exceed the single transaction purchase limit. An authorized purchase that would exceed an individual cardholder's single purchase limit shall <u>not</u> be divided or "split" into two or more transactions to stay under the single purchase limit.

(a) When a requirement exceeds a Purchase Cardholder's single transaction purchase limit, the Purchase Cardholder shall contact their AO; the AO can contact the APC via email and request a temporary increase in the Purchase Cardholder's single purchase limit as long as the total requirement does not exceed the micro-purchase threshold of $3,000;

(b) The single transaction purchase limit for non-warranted personnel generally may not exceed $3,000. The APCs must consider the requirements in Section VII, C, 1 before authorizing a single purchase limit over $3,000.

(9) Only government personnel who have received the proper training in the use of the purchase card shall be authorized to purchase supplies and services with the purchase card.

(10) The Purchase Cardholder must safeguard their purchase card, convenience checks and purchase card account number at all times.

(a) A Purchase Cardholder who makes an unauthorized purchase may be liable to the Agency for the total amount of the unauthorized purchase, which may be recovered via salary offset. The Office of Management and Budget (OMB) Circular A-123, Appendix B, Chapter 4, titled "Risk Management," discusses disciplinary actions that may be taken against Purchase Cardholders. Improper, fraudulent, abusive, or negligent use of any government charge card is prohibited. The Agency may impose disciplinary action for charge card infractions, including removal for serious or repeated infractions. Appropriate Agency personnel may impose, but are not limited to, the following administrative and/or disciplinary actions for negligence, misuse, abuse, or fraud:

1 Verbally counsel and issue a letter of counseling/reprimand to the Purchase Cardholder;

2 Deactivate, suspend, or cancel the Purchase Cardholder's account; and

3 Impose additional disciplinary actions deemed appropriate by the Agency.

(b) Permitting someone else to use an individual Purchase Cardholder's purchase card, even within the same program

office/activity, is never allowed; if this happens, it may result in disciplinary action and/or cancelation of Purchase Cardholder privileges; OMB Circular A-123, Appendix B, Chapter 4, titled "Risk Management," discusses disciplinary actions that may be taken against Purchase Cardholders.

(11) The purchase card shall not be issued to or used by contractor personnel under any circumstances.

(12) All purchase transactions made by a Purchase Cardholder must be supported by a signed PR. The PR must be signed by a responsible fiscal authority (Fund Certifying Official) and an Authorized Requisitioner. There are two types of PRs: an individual PR and a Bulk Funding PR.

(a) Individual PR – A document that describes the goods or services to be obtained and on the basis of which a procurement action is initiated. An individual PR is an authorization from a responsible fiscal authority to obligate funds for a specific purchase not to exceed a specified sum.

(b) Bulk Funded PR – A Bulk Funded PR allows multiple purchases to be made using a specified lump sum of funds for a specified period of time. The Purchase Cardholder receives authorization from a responsible fiscal authority to obligate funds and from an Authorized Requisitioner signifying the purchases serve a bona fide need.

(13) A Fund Certifying Official must determine the availability of funds and an Authorized Requisitioner must consent to the purchase prior to the Cardholder placing any order for goods or services.

(14) All purchases made by a purchase card must be supported by an accountable document (e.g., a purchase card receipt or a telephone log entry that shows the date of purchase, name of authorizing official, vendor name, item description, and the amount of purchase).

(15) State Sales Tax. Purchases by the Federal Government are generally exempt from a State's sales tax (the purchase card also bears this notation). A toll free number is included on the back of the purchase card for the merchant to contact if they have any questions regarding sales tax. The U.S. Constitution specifically prohibits states from charging the Federal Government taxes. States will exempt any centrally billed accounts that are paid by the Federal Government. States are well aware that the Federal Government pays the bills directly for these types of purchases.

(a) The cardholder may also request that the APC provide him or her with a copy of their State sales tax agreement letter or the Web address. Federal Lands Highway Division cardholders may request that their PCPC provide them with the applicable sales tax information. If the PCPC cannot provide the information, the PCPC may contact the APC.

(b) Charges processed with sales tax must be resolved between the Purchase Cardholder and the vendor/merchant.

(c) The contractor bank (card issuer) cannot assist the Purchase Cardholder in resolving disputes for sales tax.

(16) Merchants in the United States and its U.S. territories are permitted to impose a surcharge on credit card purchases. A surcharge is a fee that the retailer adds to the cost of a purchase when a customer uses a credit card, including the government purchase card. Surcharges are the result of a settlement of litigation brought by a group of U.S. retailers. *Not all merchants will impose surcharges.* Merchants that do impose the surcharge must inform the purchase card user before the purchase. Merchants must show surcharge amounts on receipts. **In no event can the merchant assess a surcharge above 4 percent**.

(a) If the merchant is charging in excess of 4 percent, the cardholder can notify the merchant and have the merchant adjust the surcharge. If the merchant refuses to lower the surcharge, then the cardholder can report that the merchant is charging excessive purchase card surcharges.

(b) Currently, 10 States have surcharging restrictions: California, Colorado, Connecticut, Florida, Kansas, Maine, Massachusetts, New York, Oklahoma, and Texas.

(17) Purchases that require prior administrative approval shall not be made until the proper authority has approved the purchase(s). For example, a waiver to use Online Money Transfer Services must be approved by one level above the AO (see paragraph 7k of this directive). Consult internal office operating procedures for further guidance.

(18) Purchase Cardholders shall review all potential acquisitions to determine if the procurement can be accomplished through the use of the Government Purchase Card Program (SmartPay 2).

(a) If the vendor/merchant accepts the purchase card, the purchase shall be made in accordance with procedures outlined in the TAM and the FHWA Purchase Card Manual.

(b) With the exception of items listed in paragraph 7k, the purchase card may be used for over-the-counter, telephone, and online purchases from participating vendors.

j. **Rules governing the use of convenience checks.**

(1) Convenience checks are for official use and shall only be used when a merchant does not accept the purchase card or a Purchase Order.

(2) Convenience checks shall never be made payable to FHWA employees.

(3) Convenience checks are another way of paying for goods and services and shall be treated the same as the purchase card; the same rules that govern the purchase card are applicable to convenience checks.

(4) At FHWA Washington Headquarters, HAAM will be the only office that has the authority to issue convenience checks.

(a) Purchase Cardholders at FHWA Washington Headquarters who need convenience checks must forward the request through PRISM to HAAM.

(b) Division Offices that do not have Purchase Cardholders with the authority to process convenience checks must forward the request through PRISM to the Lakewood Administrative Service Team.

(c) The processing of convenience checks via PRISM is covered in an Acquisition Procedural Memorandum (APM). APM-014A, titled "Processing of Convenience Checks for FHWA Offices," details the step-by-step procedures for processing convenience checks via PRISM.

(5) The contractor bank cannot assist cardholders in disputing convenience checks; any concerns regarding purchases made with convenience checks must be resolved directly with the vendor.

(6) A stop payment request is permitted on a convenience check if the convenience check has not been posted to the Purchase Cardholder's account; stop payment actions take 24 hours.

(7) When not in use, convenience checks are to be kept in a secured area to protect the checks from being stolen or misused.

(8) On a quarterly basis, AOs should conduct an inventory of unused convenience checks. If any convenience checks are missing, the contractor bank and the APC should be notified immediately. If AOs desire to conduct more frequent inventories (i.e., monthly) of convenience checks, that is strictly up to the discretion of the AO.

k. **Rules governing the use of Online Money Transfer Services.** Purchases made utilizing online money transfer services (e.g., PayPal, c2it by Citibank, EBay) are prohibited, unless approved at a level above the AO. These purchases lack transparency (i.e., purchases are often categorized under general Merchant Category Codes), and are not covered under the bank's disputes/charge back procedures.

(1) In FHWA, the APC or alternate APC for the Government Purchase Card Program is considered as the level above the AO.

(2) To use Online Money Transfer Services for purchases, FHWA Purchase Cardholders must forward the request by email to the APC and receive written approval from the APC or alternate APC.

l. **Unauthorized use of the purchase card – *Prohibited Purchases.*** The purchase card may not be used for the following types of purchases:

(1) Personal purchases;

(2) Cash advances;

(3) Airline, bus, boat, or train tickets;

(4) Rental or lease of motor vehicles;

(5) Meals, beverages, or lodging;

(6) Repairs, gasoline, or oil for GSA motor vehicles or other commercially leased vehicles;

(7) Promotional materials (unless the purchaser has specific statutory authority);

(8) "After the Fact" purchases (purchases made by an unauthorized individual);

(9) Payments of attorney fees;

(10) Purchases of entertainment or recreation;

(11) Payments of personal membership fees;

(12) Payments of personal expense items, such as gifts for employees, entry fees for contests, and medals or trophies (unless they fall under the "Award/Incentive Programs"); or

(13) Open market purchases of items available from mandatory sources.

(14) The purchase card cannot be used for non-expendable property at Washington Headquarters Offices, which includes telecommunications, furniture, other accountable and/or sensitive equipment, data communication lines, hardware, software, or services. Please reference the FHWA Purchase Card Manual for procedures related to purchasing non-expendable property at FHWA Field Offices.

m. **Notification of lost or stolen purchase card.** The Purchase Cardholder is responsible for securing his or her purchase card. In the event a purchase card is lost or stolen, it is the cardholder's responsibility to contact the card issuer immediately.

(1) The Purchase Cardholder must forward written confirmation to their AO and to the APC, notifying them that their purchase card was lost or stolen and that the card issuer has been notified;

(2) Federal Lands Highway Division Offices' Purchase Cardholders must forward written confirmation to their AO, to their PCPC and copy the APC, notifying them that their purchase card was lost or stolen and that the card issuer has been notified.

n. **Notification of lost or stolen convenience checks.** The Purchase Cardholder is responsible for securing their convenience checks. In the event convenience checks are lost or stolen, it is the Purchase Cardholder's responsibility to contact the contractor bank immediately.

(1) The Purchase Cardholder must forward written confirmation to their AO and to the APC, notifying them that their convenience checks were lost or stolen and that the contractor bank has been notified.

(2) Federal Lands Highway Division Offices' cardholders must notify the contractor bank immediately. Federal Lands cardholders must forward written confirmation to their PCPC and copy the APC, notifying them that the contractor bank has been notified.

(3) To ensure that the lost or stolen convenience checks reporting process is firmly adhered to by Purchase Cardholders, AOs should conduct an inventory of unused convenience checks on a quarterly basis. If any convenience checks are missing, the contractor bank and the APC should be notified immediately. If AOs desire to conduct more frequent inventories (i.e., monthly) of convenience checks, that is strictly up to the discretion of the AO.

o. **Reporting purchase card fraud.**

(1) All Purchase Cardholders are responsible for reviewing their purchase card account and the accompanying monthly statement to look for indicators of fraud; if fraud is suspected, Purchase Cardholders should report the suspected fraud immediately to the contractor bank, their AO, and the APC. Federal Lands Purchase Cardholders should report the suspected fraud immediately to the contractor bank, their AO, and their PCPC; in turn the PCPC will report the suspected fraud to the APC.

(2) All AOs are responsible for reviewing their Purchase Cardholder's purchase card account, including convenience checks, if applicable, and the accompanying monthly statement to look for indicators of fraud; if fraud is suspected, AOs should report the suspected fraud immediately to the Purchase Cardholder, the contractor bank, and the APC. Federal Lands AOs should report the suspected fraud immediately to the contractor bank, their Purchase Cardholders and their PCPC; in turn the PCPC will report the suspected fraud to the APC.

(3) If fraud is detected, the Purchase Cardholder must report it to his or her respective AO, the PCPC (Federal Lands cardholders only), the APC, and the Office of Inspector General. If the Purchase Cardholder is not available, then the AO must assume the role of the Purchase Cardholder and report the fraud to the APC and the Office of Inspector General.

(4) If fraud is detected, the Purchase Cardholder must immediately dispute the transaction. The FHWA and the contractor bank will resolve disputed charges in accordance with the terms of the Governmentwide GSA Purchase Card contract.

(5) If fraud is detected, the Purchase Cardholder must notify the contractor bank to report the fraud. If the Purchase Cardholder is not available, the AO assumes the role of the Purchase Cardholder and then the AO must notify the contractor bank to report the fraud. The FHWA and the contractor bank will resolve disputed charges in

accordance with the terms of the Governmentwide GSA Purchase Card contract.

p. **Inactive Accounts.**

(1) The APC shall cancel inactive accounts unless there are extenuating circumstances, such as the Purchase Cardholder being designated a COOP cardholder. Other examples of extenuating circumstances include expectations of future purchase requirements after the retirement or separation of a primary cardholder, or a change in responsibilities of the primary cardholder due to reassignment.

(2) The APC shall perform an annual review of purchase card usage and identify purchase card accounts that appear to be inactive. The APC shall provide the list of inactive accounts, excluding designated COOP cardholder accounts, to AOs and PCPCs for Federal Lands Purchase Cardholders. The APC will request justifications to retain the accounts.

(a) Failure of AOs to provide required justifications will result in cancelation of the inactive accounts.

(b) Failure of Federal Lands PCPCs to provide required justifications will result in cancelation of the inactive accounts. In the absence of the PCPC, Federal Lands AOs must provide the required justifications or this will result in the cancelation of the inactive accounts.

q. **Cancelation of purchase card account.**

(1) With the exception of lost or stolen purchase cards, the APC is responsible for cancelling any purchase card accounts under his or her purview. In the case of lost or stolen cards, the contractor bank will automatically cancel the purchase card.

(2) The AOs or PCPCs must promptly forward an email or send a fax to the APC to cancel any Purchase Cardholder's account who:

(a) Retires, resigns, or dies; or

(b) Is terminated, reassigned to another position, or is no longer qualified as a cardholder.

(3) The AOs must ensure that the cardholder's purchase card and convenience checks (if applicable) were destroyed before the APC can cancel the purchase card account. The AOs must confirm via

email that the purchase card and convenience checks were destroyed. The AOs must also confirm via email to the APC that all purchase card transactions on the cardholder's account have been validated.

(4) Federal Lands PCPCs and AOs must ensure that the Purchase Cardholder's purchase card and convenience checks (if applicable) are destroyed before the APC can cancel the purchase card account. The PCPCs must confirm via email that the purchase card and convenience checks were destroyed. The PCPCs must also confirm via email to the APC that all purchase card transactions on the cardholder's account have been validated.

r. **Validation of purchase card transactions**.

(1) Per the TAM, the AO must ensure that all Purchase Cardholders validate account purchases and credits itemized on the cardholder's statements within 7 calendar days after receipt of the monthly statement. In the absence (planned or otherwise) of the cardholder, the AO must reconcile the Purchase Cardholder's monthly statements within 7 calendar days after receipt.

(a) The "validation process" is when both the Purchase Cardholder and the AO match the transactions in the electronic banking system with the supporting documentation (PR, invoice, receipt, etc.) and agree that the purchases are legal and are being charged to the proper accounting string.

(b) To complete the "validation process," the Purchase Cardholder and the AO must respectively "approve" and "final approve" the purchase card transactions in the electronic banking online system.

(2) The FHWA developed an APM to supplement the TAM. APM-024-A establishes the criteria of a 21-day window to validate the purchase card charges and credits; the 21-day window includes 7 calendar days for the Purchase Cardholder to "approve" the purchase card charges and credits, and the AO has 14 days to "final approve" the purchase card charges and credits after the Purchase Cardholder has approved the charges and credits.

(3) If the Purchase Cardholder and/or AO fail to validate the purchase card transactions within the 21-day window, the APC can "Voluntarily Close" the Purchase Cardholder's account or request that U.S. Bank suspend the account until all applicable purchase card transactions have been validated.

(4) The 45-day window to reconcile the purchase card transactions is strictly based on the contractual agreement between DOT and the contractor bank. If all purchase card transactions are not reconciled within 45 days from the end of the billing cycle (the 19th of each month), then the contractor bank will suspend the Purchase Cardholder's account.

s. **Termination of purchase card account due to repeated suspensions.** Purchase Cardholders are subject to termination of their purchase card account upon repeated suspensions of their purchase card account within a 12-month period. Per DOT's agreement with the contracting bank, the Purchase Cardholder and AO have 45 days from the end of the billing cycle (the 19th of each month) to validate the purchase card transactions in the electronic system; if this task is not accomplished within the 45-day window (see Item (p) (4) of this order), then the purchase card account will be suspended until the outstanding transactions are validated. The APC is the final arbiter that determines if the Purchase Cardholder's account will be terminated for repeated suspensions, as detailed below:

(1) **First suspension.**

(a) No punitive action is taken by the APC.

(b) The APC will notify the Purchase Cardholder and the AO that the Purchase Cardholder has one suspension on their record.

(2) **Second suspension.**

(a) If there is no valid justification or compelling extenuating circumstances, the Purchase Cardholder's account will be suspended for 60 days.

(b) The Purchase Cardholder's AO must submit an email or memorandum to the APC describing the circumstances that caused the Purchase Cardholder to fail to reconcile the purchase card transaction(s) within the 45-day window.

(3) **Third suspension.**

(a) The Purchase Cardholder's AO must provide a written memorandum to the APC on why the Purchase Cardholder failed to validate the outstanding purchase card transactions within the 45-day window.

(b) If there is no valid justification or a compelling explanation of extenuating circumstances provided by the AO to the APC, the APC will cancel the purchase card account.

(c) The purchase card account will not be terminated until the Purchase Cardholder and the AO have completed the "validation process" on the outstanding purchase card transactions.

1 The "validation process" is when both the Purchase Cardholder and the AO match the transactions in the electronic banking system with the supporting documentation (PR, invoice, receipt, etc.) and agree that the purchases are legal and are being charged to the proper accounting string.

2 To complete the validation process, the Purchase Cardholder and the AO must respectively "approve" and "final approve" the purchase card transactions in the electronic banking online system.

(d) The Head of an Office or their Deputy can request a postponement of the cancelation of the purchase card account until a replacement is nominated and trained. The postponement will be for no longer than 30 days.

t. **COOP Emergency Use Cards.**

(1) Headquarters Program Offices, Federal-aid highway Division Offices, Federal Lands Division Offices, Resource Center Offices, and Administrative Service Team Offices may designate a COOP Purchase Cardholder. The designation of a COOP Purchase Cardholder is optional. The office's AO may nominate the primary cardholder or an alternate cardholder as the COOP Purchase Cardholder. Offices may request purchase cards for emergency use without the need to use the cards on a recurring basis.

(2) Requests for emergency use cards must contain an appropriate justification citing the cardholder's anticipated participation if the COOP is activated. The COOP-designated cardholders must maintain their eligibility by completing annual refresher training requirements. The COOP-designated cardholders may continue to use their cards during non-emergencies to purchase products and services in accordance with the limits on their cards. For single purchase limits during a contingency operation, refer to paragraph 7b(3)(a).

u. **FHWA liability for unauthorized use of the purchase card.**

(1) The FHWA is liable only for the authorized use of the U.S. Government purchase card by an authorized cardholder.

(2) The FHWA is not liable for intentional use of a purchase card to obtain items not authorized for purchase. This is considered an attempt to commit fraud against the U.S. Government. The OMB Circular A-123, Appendix B, Chapter 4, titled "Risk Management," discusses disciplinary actions that may be taken against Purchase Cardholders. Improper, fraudulent, abusive, or negligent use of any government charge card is prohibited. The Agency may impose disciplinary action for purchase/charge card infractions, including removal for serious or repeated infractions. Appropriate Agency personnel may impose, but are not limited to, the following administrative and/or disciplinary actions for negligence, misuse, abuse, or fraud:

(a) Immediate cancelation of the purchase card.

(b) Immediate disciplinary actions for unauthorized careless use. Circumstances surrounding each case should be considered when determining the proper type of corrective or disciplinary/adverse action, if any, which may be imposed. Generally, a progression of increasingly severe penalties is suitable. In some instances, the infraction may warrant the most severe penalty for a first offense. Disciplinary actions include, but are not limited to, the following:

1 Verbally counsel and issue a letter of counselling or reprimand to the employee;

2 Deactivate, suspend, or cancel employee account; and

3 Impose additional disciplinary actions deemed appropriate by the Agency.

(c) Liability to FHWA for the total dollar value of the unauthorized purchase.

(d) A fine of not more than $10,000, imprisonment for not more than 5 years, or both, under 18 U.S.C. 287.

v. **Frequency of Purchase Card Program audits.** The FHWA APC will conduct quarterly audits. The audits may be on-site or off-site. The APC will randomly select purchase card transactions for audit.

(1) The cardholder or AO will provide all necessary documentation to the APC within the given deadline.

(2) For Federal Lands cardholders, the PCPC will collect all necessary documentation from the cardholder or AO and provide the necessary documentation to the APC within the given deadline.

w. **COCO Waiver Requests.** In accordance with the TAM, a COCO that deems a waiver is needed from any requirement in this directive must submit a written request justifying the need for an exemption to the APC. As the technical expert for the Government Purchase Card Program, the APC will review the documentation, provide guidance, if needed, and either concur or non-concur before forwarding the request for the waiver through the Associate Administrator for Administration to the HCA.

8. **What are the responsibilities of the APC?** The primary APC responsibilities are:

a. Overseeing FHWA participation in the Government Purchase Card Program by:

(1) Providing continuing assistance and advice to Purchase Cardholders and AOs;

(2) Establishing Purchase Card Program guidelines based on procurement rules and regulations contained in the FAR, the TAM, and DOT/FHWA policies;

(3) Providing a forum for discussion for any matters related to Government purchase card use;

b. Serving as the official liaison between FHWA, DOT, GSA, and contractors;

c. Acting in an advisory capacity for cardholders and AOs;

d. Maintaining an up-to-date list of all cardholders and AOs, annotated with limitations on single transactions and total transactions applicable to the use of each purchase card;

e. Creating new purchase card accounts after reviewing and approving the Purchase Cardholder's application;

f. Serving as a focal point for terminating existing purchase card accounts;

g. Establishing a new AO's hierarchy and/or changing the existing AO's hierarchy when requested by the Agency/office;

h. Overseeing and maintaining Initial and Refresher Purchase Card Training for Purchase Cardholders and AOs;

i. Performing procurement reviews of the Government Purchase Card Program;

j. Receiving and reviewing written requests from AOs, and processing the following changes in the applicable electronic banking system:

(1) Increasing and decreasing purchase card authorization limits,

(2) Changing default accounting codes, and

(3) Changing cardholders' reporting and processing hierarchies;

k. Conducting periodic reviews of purchase card usage, identifying inactive accounts, and determining whether each Purchase Cardholder has a need for the purchase card;

l. Reviewing purchase card use for compliance with the FAR, the TAM, the FHWA Purchase Card Manual, and other applicable procurement regulations;

m. Revoking purchase cards immediately if fraud or abuse is discovered; per DOT's agreement with the contracting bank, the purchase card account is immediately revoked by the contracting bank if fraud or abuse is discovered by the bank or an internal source (i.e., Purchase Cardholder, AO, or APC);

n. Monitoring convenience check usage throughout the Agency; and

o. Updating FHWA directives on the Government Purchase Card Program, the FHWA Purchase Card Manual, and StaffNet postings related to purchase cards.

9. **What are the responsibilities of the Federal Lands Highway Division Offices PCPC?**

a. The PCPC acts as the official liaison between the Federal Lands Highway Division Offices' Purchase Card Program participants and the APC;

b. Other primary PCPC' responsibilities include but are not limited to:

(1) Serving as a conduit between AOs, cardholders, and HAAM to resolve purchase card-related issues;

(2) Acting as audit liaison, ensuring internal and external audit requests are handled properly;

(3) Acting in an advisory capacity for Federal Lands cardholders and AOs, serving as an in-house expert on purchase card issues;

(4) Ensuring Federal Lands cardholders and AOs follow procurement rules, regulations, policies, and procedures;

(5) Ensuring proper procedures are followed before requesting establishment of new purchase card account:

(a) Ensuring each prospective new cardholder has completed FHWA Purchase Card Training;

(b) Assisting in completion of new cardholders' purchase card applications;

(c) Coordinating with AOs to determine appropriate single purchase limit and monthly credit limits;

(d) Ensuring Purchase Cardholders and AOs understand their responsibilities—AOs and cardholders must sign a Cardholder/Approving Official Certification indicating that they understand their roles;

(e) Forwarding the new cardholder package, including the Training Completion Certificate, the Cardholder Application, and the Cardholder/Approving Official Certification form to the APC;

(6) Coordinating changes of cardholders' AOs;

(7) Working closely with AOs to determine if cardholders' single purchase and monthly credit limits require adjustments;

(8) Coordinating changes with AOs on cardholders' Default Accounting Codes;

(9) Reporting purchase card abuse immediately upon discovery, and, if proven, recommending termination; and

(10) Deleting Purchase Cardholder accounts:

(a) Ensuring all purchases have been reconciled (reviewed, approved, and final approved),

(b) Ensuring the purchase card has been destroyed,

(c) Ensuring any unused convenience checks have been destroyed,

(d) Confirming destruction of the purchase card and convenience checks via email to the APC,

(e) Submitting requests to close purchase card accounts to the APC, and

(f) Ensuring Purchase Cardholders' files are maintained for 3 years by the PCPC or AO.

10. **What are the responsibilities of Purchase Cardholders and AOs?**

a. **Purchase Cardholders are responsible for:**

(1) Securely maintaining a purchase card log including all monthly statements and receipts;

(2) Safeguarding the purchase card and purchase card account number (and convenience checks, if applicable) at all times and not allowing anyone to use their purchase card, convenience checks, or purchase card account;

(3) Ensuring that the funds are available prior to purchase by using the purchase request form (Form DOT 4200.1);

(4) Ensuring that individual purchases and cumulative monthly purchases do not exceed single purchase limits and monthly credit limits, respectively, by adhering to the limits authorized on the DPA by the COCO or the COCO's designee;

(a) A single purchase card transaction may consist of the purchase of a number of individual items, the sum of which (including any shipping costs) may not exceed the single transaction purchase limit; an authorized purchase that would exceed an individual cardholder's single purchase limitation shall not be divided or "split" into two or more transactions to stay under the single purchase limit;

(b) When an authorized purchase exceeds a cardholder's single transaction purchase limit, the cardholder shall contact their AO; the AO can contact the APC via email and request a temporary increase in the cardholder's single purchase limit

as long as the total requirement does not exceed the micro-purchase threshold of $3,000;

(5) Ensuring that all purchases are authorized and executed in accordance with applicable regulations, policies, and procedures, such as the avoidance of using the purchase card for "after the fact" purchases;

(6) Ensuring that sales taxes have not been charged;

(7) Reviewing their monthly statement in order to approve or dispute transactions, reallocate lines of accounting, and submit transactions to their respective AO;

(8) Printing out the monthly statement, attaching all documentation (such as PRs, receipts, invoices, and any other applicable documentation), and signing and dating the statement;

(9) Submitting the monthly statement with supporting documentation to the AO;

(10) Contacting the APC, AAPC, or PCPC (for Federal Lands cardholders) with any questions or clarifications concerning purchases; and

(11) Per the FAR, Part 4, Para. 4.703, and the FHWA Purchase Card Manual, the Purchase Cardholder must maintain monthly statements, invoices/receipts, and other supporting documentation for 3 years. Paragraph 4.703 states that except as stated in 4.703(b), contractors shall make available records—which includes books, documents, accounting procedures and practices, and other data, regardless of type and regardless of whether such items are in written form, in the form of computer data, or in any other form—and other supporting evidence to satisfy contract negotiation, administration, and audit requirements of the contracting agencies and the Comptroller General for 3 years after final payment, or, for certain records, the period specified in 4.705 through 4.705–3, whichever of these periods expires first.

b. **AOs are responsible for:**

(1) Determining the appropriate dollar amounts of single purchase limits and monthly credit limits;

(2) Reviewing monthly statements and applicable documentation such as PRs, purchase card receipts, invoices, and any other applicable documentation submitted by the Purchase Cardholder;

(3) Verifying that all purchases by Purchase Cardholders are authorized and that large purchases of supplies and/or services have not been split into smaller purchases as not to exceed the simplified acquisition micro-purchase threshold or the single purchase limit authorized by the DPA;

(a) A single purchase card transaction may consist of the purchase of a number of individual items, the sum of which (including any shipping costs) may not exceed the single transaction purchase limit. An authorized purchase which would exceed an individual purchase cardholder's single purchase limitation shall not be divided or "split" into two or more transactions to stay under the single purchase limit.

(b) When an authorized purchase exceeds a Purchase Cardholder's single transaction purchase limit, the Purchase Cardholder shall contact their AO; the AO can contact the APC via email and request a temporary increase in the Purchase Cardholder's single purchase limit as long as the total requirement does not exceed the micro-purchase threshold of $3,000;

(4) Determining that the Purchase Cardholder's purchases are made according to applicable regulations, policies, and procedures;

(5) Ensuring that all Purchase Cardholders validate and approve purchases and credits on a monthly basis;

(6) Ensuring that the proper lines of accounting have been charged;

(7) "Final Approval" of all Purchase Cardholders' transactions on a monthly basis (unless the transaction is being disputed);

(8) Signing the printed monthly statement and attaching all PRs, receipts, invoices, vouchers, and other related documentation;

(9) Per the FAR, Part 4, Paragraph 4.703, and the FHWA Purchase Card Manual, the AO or PCPC (Federal Lands only) must retain, for auditing purposes, monthly statements and related supporting documentation for 3 years for Purchase Cardholders who no longer have active purchase card accounts. Paragraph 4.703 states that except as stated in 4.703(b), contractors shall make available records—which includes books, documents, accounting procedures and practices, and other data, regardless of type and regardless of whether such items are in written form, in the form of computer data, or in any other form—and other supporting evidence to satisfy

contract negotiation, administration, and audit requirements of the contracting agencies and the Comptroller General for 3 years after final payment, or, for certain records, the period specified in 4.705 through 4.705–3, whichever of these periods expires first;

(10) Notifying the APC if the Purchase Cardholder's status has changed (e.g., termination or no longer participating in the program); Federal Lands AOs must notify their PCPC if the cardholder's status changes and the PCPC in turn will notify the APC;

(11) Notifying the APC if the cardholder's contract warrant has expired or has been revoked—the APC may reduce the purchase limits;

(12) Initiating the appropriate action if a Purchase Cardholder uses the purchase card in an unauthorized manner, and notifying the APC of the action; Federal Lands AOs must notify their PCPC if the cardholder uses the purchase card in an inappropriate manner and the PCPC will in turn notify the APC; and

(13) On a quarterly basis, conducting an inventory of unused convenience checks, and if any convenience checks are missing, immediately notifying contractor bank and the APC—if AOs desire to conduct more frequent inventories (i.e., monthly) of convenience checks, that is strictly up to the discretion of the AO.

11. **Where can I find additional information about the Purchase Card Program?** For additional information about the Purchase Card Program, the FHWA Purchase Card Manual is available online in StaffNet.

Victor M. Mendez
Administrator