

Chapter 13 - Management Reviews

In addition to the reviews in this chapter, per DoD FMR Vol 10 Ch. 23 section 230202, audits pursuant to 10 USC 4754 (b)(14-15), the purchase card program is subject to periodic audits by the DoD Inspector General and the Military Services' audit agencies to determine whether the program complies with agency policy.

Table 13-1: Monitoring and Oversight

Description	Frequency
CH Approval of the Billing Cycle Statement	Monthly
BO Certification of the Billing Cycle Statement	Monthly
IOD Data Mining Adjudication and Reporting	Tables 11-1, 11-2, 11-3
Level 4 Annual Assessment	Annually
Level 3 PMR of the Level 4	Every 3 Years
Level 2 PMR of the Level 3	Every 3 Years
Random/Special PMRs	As necessary
Customer Feedback	As received
Semi-Annual Head of Activity Report	Every 6 Months

Parent topic: [APPENDIX - EE DEPARTMENT OF THE ARMY GOVERNMENT PURCHASE CARD OPERATING PROCEDURES](#)

13-1. Level 4 A/OPC Annual Management Assessment

a. In addition to IOD monthly and semi-annual reviews, the primary Level 4 A/OPC must perform an annual assessment of their GPC program. This assessment will assist Level 4 A/OPCs in evaluating their GPC program's internal controls and overall compliance with the GPC program's objectives, policies, procedures, and best practices.

b. Reports of reviews will provide information to each management level, identifying systemic weaknesses within their organization.

c. The primary Level 4 A/OPC must complete the Level 4 A/OPC Annual Management Assessment

template annually. The template is located at <https://procurement.army.mil/gpc>. One assessment must be completed for each primary Level 4 A/OPC. Upon completion, the primary Level 4 A/OPC will provide the assessment to the Level 3 A/OPC. The Level 3 and 4 A/OPCs will take corrective action as needed and retain a copy for three years.

13-2. Level 3 Procurement Management Review

Level 3 A/OPCs will periodically conduct PMRs on their Level 4 A/OPCs per the guidance contained in AFARS, Appendix CC. The primary focus areas of this PMR are assessing compliance with policies and procedures, program management, monitoring and oversight, and training.

13-3. PMR Reviews

a. When conducting a PMR, the reviewer will perform the following tasks:

- 1) Identify patterns of noncompliance, determine the magnitude of the deficiencies, and seek the root causes of problem areas.
- 2) Pursue systemic issues.
- 3) Teach systems, processes, and procedures, and spread innovative ideas.
- 4) Identify responsibilities for corrective action.
- 5) Train those inspected and, as appropriate, those conducting the reviews.
- 6) Brief leadership on results.
- 7) Make recommendations when appropriate.
- 8) Verify the implementation of those recommendations.

13-4. Army GPC PMR Process

a. The Department of the Army, through the ODASA(P), will establish, execute, and provide oversight of a tiered GPC PMR program reviewing each contracting activity every three years in order to achieve the following:

- a. Assess, analyze, and communicate the health of Army contracting to senior Army leadership.
- b. Ensure management oversight and control of contracting related issues.
- c. Ensure compliance with Federal, Defense, and Army acquisition regulations and policies.
- d. Provide best practices for the Army to enhance the procurement process.

b. Purpose and Objectives of PMRs.

- 1) Foster good stewardship of resources.
- 2) Improve processes.
- 3) Evaluate and strengthen internal controls.
- 4) Assess and reduce risk.
- 5) Ensure that agencies establish and maintain internal controls to provide reasonable assurance the goals and objectives of the purchase card program are being met, and safeguards against fraudulent, improper, and abusive purchases are adequate.
- 6) Assess program results.
- 7) Communicate results so systemic problems can be identified and addressed.
- 8) Implement Corrective Action Plans.
- 9) Improve the performance and accountability of the GPC program.

c. HCAs or SCOs will conduct GPC PMRs on contracting activities, to include subordinate contracting offices, regardless of the level, at least once every 36 months and provide the schedule of reviews no later than 31 August of the preceding fiscal year to the ODASA(P). ODASA(P) may grant, in writing, an extension to four years on a one-time basis when circumstances are justified. Additionally, the ODASA(P) may require, in writing, more frequent reviews of contracting activities as deemed necessary.

d. **Preparation for GPC PMRs.** Reviewers should notify the activity being reviewed 30 days before planned GPC PMR visits. The activity will provide the following in advance: metrics, bank reports and IOD data mining reports, completed GPC toolkit, specified statistics, copies of previous reviews/corrective action plans, procurement authority, and training materials. Additionally, the activity may request additional areas of emphasis and assistance during the GPC PMR.

e. Results of Procurement Management Reviews.

- 1) Reports of GPC PMR results will contain a risk assessment, analysis of issues, commendations, observations, findings, and recommendations as appropriate. GPC PMR report findings must be specific and include sufficient information to enable root cause analysis. GPC PMR recommendations must be based on supported findings and be actionable.
- 2) Contracting activities at all levels will perform timely GPC PMRs. Untimely reporting erodes the effectiveness of the review.
- 3) Reviewers will submit the initial PMR report to the reviewed activity within 30 business days after the outbrief.
- 4) The GPC contracting activity reviewed will submit a Corrective Action Plan (CAP) within 30 business days of report receipt.
- 5) The responsible review official must review and approve the CAP and prepare a Final PMR report within 30 business days of CAP receipt.

6) The reviewed activity must complete corrective actions - if any - within the agreed timeframe, inform the GPC PMR Team Lead of corrective actions taken, and request closure of the CAP.

f. Annual Summary Health Report.

1) HCAs will provide to the ODASA(P), an Annual Summary Health Report for their organization to include copies of all GPC PMR reports and associated analyses of subordinate contracting offices GPC reviews no later than 31 October each year.

2) The ODASA(P) will provide an Annual Summary Health Report to DASA(P) that presents a holistic assessment of Army GPC contracting no later than 31 January each year.

h. GPC Review Key Areas.

- 1) Delegation of contracting authority
- 2) Training requirements for program coordinators, approving officials and cardholders
- 3) Setting of reasonable single purchase and monthly limits and blocking of MCCs
- 4) Annual reviews to evaluate the number of CHs and BOs, CHs limits and transactions
- 5) Uses of the GPC
- 6) Independent Receipt and Acceptance
- 7) Reconciling accounts and certification of transactions
- 8) Span of control for BOs and A/OPCs
- 9) Criteria for establishing accounts
- 10) Convenience checks, annual review and 1099 Reporting
- 11) Delinquency and Prompt Pay Interest
- 12) Maximizing Refunds
- 13) Criteria for deactivation/cancellation/termination of cards
- 14) Documentation/Retention (e.g., uploading transaction documentation in the bank's EAS)

13-5. Customer Feedback

a. GPC personnel are expected to establish and maintain professional communication with all stakeholders to establish good working relationships and customer satisfaction. Customer satisfaction is the most significant external indicator of the success and effectiveness of all GPC services provided and can be measured through customer feedback. The A/OPC, BO, or CH will acknowledge valid customer feedback and investigate as appropriate. Customer feedback must be in writing detailing the nature of the issue and forwarded to the A/OPC, BO, or CH. Customer feedback may be obtained from the results of formal customer satisfaction surveys.

b. Customer feedback may be treated as a method of review. In this case, the Army takes feedback from the requiring activities on the quality of the GPC service provided to include services provided by the GPC servicing bank. The quality of the services provided is based on the following factors:

- 1) Quality
- 2) Completeness
- 3) Responsiveness and timeliness of providing services
- 4) Business relationship, i.e., professional behavior and overall business-like concern for the interests of the customer
- 5) GPC systems reliability
- 6) Cost savings
- 7) Efficiency and effectiveness