

## IC Purchase Card Coordinator's Meeting

May 12, 2016

### Attendees

Bandel, Amy (NCI)	Osbourne, Philip (DAPE)
Brewer, Niaema (NIDDK)	Palacios, Vanessa (DSAPS)*
Brown, Dionne (NLM)	Preston, Rebecca (NICHD)
Brown, Michael (NEI)	Powell, Felicia (NEI)
Davis, Nancy (NIAID)	Pulliam, Zelia (NIDCD)
Davol, Tabitha (DSAPS)*	Rappaport, Doreen (DSAPS)*
Dorsey, Denise (NINDS)	Redd, David (OALM)
Drake, Patricia (ORF)	Ricche, Andi (NIAMS)
Draper, Dionne (NIMH)	Robinson, Sylvia (NICHD)
Ellis, Ann (NCCIH)	Romero, Michelle (DSAPS)*
Fowler, Kelly (NCI)	Sanders, Jimmy (NIDCR)
Hawkins, Raymond (NIDA)	Schechter, Louis (NIA)
Jackson, Twann (OD)	Sheelor, Marisa (NINR)
Jones, Silver (OD)	Simmons, Monique (DSAPS)*
Jones-Johnson, Shelley (NIBIB)	Smith, Andrea (CIT)
Johnson, John (NIA)	Snowden, Maria (DSAPS)*
Kessler, Sarah (DSAPS)*	Spates, Chris (NIMHD)
Kanti, Sup (NBS)	Stevens, Rhudel (NICHD)
Knox, Shamay (NIAID)	Stroud, Leah Ingram (OD)
Leone, Cheryl (NIMH)	Sunde, Gayle (NIAID)
McFarland, Robert (NCATS)	Thompson, Patrice (DSAPS)*
Miller, Clarion (NHGRI)	Walker, Glenda (NINDS)
Miller, Karen (NLM)	Wang, Steven (PwC)
Myles, Linda (CIT)	Wooten, Lashonda (NIGMS)
Ongaro, Daniel (PwC)	

\*Staff with NIH Purchase Card Program

The meeting was called to order at 9:35 am by Doreen Rappaport, Branch Chief of the Purchase Card Program. Agenda items discussed are presented below.

- **NBS Office Hours** – Sup Kanti with NBS informed everyone that NBS is currently preparing to host another NBS “Office Hours” discussion related to purchase card. The purpose of these discussions are to touch on common processes that cardholders and

CAOs are required perform in NBS during monthly reconciliation (e.g. reconciling transactions over MPT in NBS, disputes and credits, etc.). These discussions are open to the entire purchase card community. ICs are encouraged to submit any topics of interest for the next discussion to Doreen Rappaport ([doreen.rappaport@nih.gov](mailto:doreen.rappaport@nih.gov)) or Sup Kanti ([kantis@mail.nih.gov](mailto:kantis@mail.nih.gov)).

- **Unauthorized Commitments and Requests for Ratifications** – Philip Osborne, Director of the Division of Acquisition Policy Evaluation (DAPE) in OALM, discussed the process for ratifications of unauthorized commitments in accordance with the FAR regulation. He informed the group that effective February 1, 2016, all ratifications, regardless of the date of the unauthorized commitment, must be approved by the Head of Contracting Activity (HCA) for NIH. Ratification memos must first be submitted to Phil Osborne, DAPE Director at [Phillip.Osborne@nih.gov](mailto:Phillip.Osborne@nih.gov). His office will then coordinate approval with the HCA. For unauthorized commitments occurring in the delegated acquisition community, a memo must first be routed through the IC's respective Acquisition Office so that they may forward to the DAPE Director. Phil also discussed some examples of the most common unauthorized commitments (e.g. publications of an article, maintenance agreements, cellphone bills, service repairs, etc.). ICs must emphasize the importance of preventing unauthorized commitments and potential implications to their cardholders and CAOs. Cardholders must review invoices to ensure that they are proper and contact their CAO or IC Coordinator with any issues.
- **HHS DCIS Results (IV&V)** – David Redd, with OALM/Contract Data Management Program Office discussed the Independent Validation and Verification (IV&V) Review process. The process is intended to ensure that contract data is accurately reflected and reported in a timely manner into FPDS. He also discussed a web-based application that uses FPDS data to automate and track the completion of agency validations called FedDataCheck.net. The system utilizes the same methodologies in accordance with OMB Memo: "Improving Federal Procurement Data Quality – Guidance for Annual Verification and Validation" dated May 31, 2011. NIH Review Teams comprised of acquisition staff from various offices of acquisitions and the Purchase Card Program have completed FY15 reviews. The teams reviewed the information entered into DCIS for awards over the MPT in comparison to the documentation in the award file. Some of the findings noted include: missing information on DCIS items 21, 22, and 23, missing Contractor Key Personnel, Government Project Officer and Government Contract information, Award Date, DCIS record date, business size and DCIS Item 6M description discrepancies. ICs must advise their cardholders that the information being entered into DCIS for transactions over the MPT is then published into FPDS and made public. Cardholders must ensure that the information is accurate and matches the award file.
- **Tax Recovery** – Vanessa Palacios with the Purchase Card Program discussed ongoing tax recovery efforts by NIH. She also discussed the findings from a recent data call that occurred in March 2016. The majority of the transactions targeted were found to not have tax assessed. The program is working to streamline the report that is being used

for future data calls so that it eliminates vendors with transactions where tax was not paid yet for some reason still show on the report. ICs should remind their cardholders that tax should not be paid on the purchase card. Cardholders that find that a merchant has assessed tax, must ensure that the tax is recovered quickly and their accounts are credited in a timely manner.

- **NBS Disputes and Rebates by IC** – Sarah Kessler with the Purchase Card Program discussed that there is an ongoing effort to resolve outstanding disputes in NBS. Currently, there are over 350 open disputes in NBS for FY16. IC Coordinators have been sent a spreadsheet of open disputes for this timeframe. ICs must work with their cardholders to ensure that these disputes are accurately resolved (e.g. account is credited by merchant or bank, invoice for disputed transaction is obtained, etc.). Cardholders must continue to monitor open disputes as part of the reconciliation process to ensure that proper credit is received so that NIH does not pay invalid charges. The purchase card program is working with Nvision to develop a report for open disputes for the ICs to utilize. Sarah also gave the ICs an overview of rebates earned in FY16 for the first and second quarters. As a reminder, rebates are calculated based on spend. Rebate earnings are submitted by the bank to OFM and then OFM distributes these payments to each IC.
- **Other Administrative Updates-**
  1. NIH Purchase Card Stale Log Run – The next stale log run is scheduled for some time in late May. ICs will receive an update once these logs have been closed.
  2. Convenience Check Reduction – An updated draft to the GSA SmartPay Bulletin #12 – Reduction of Convenience Checks was sent to the ICs for input. The bulletin has been updated to include the removal of % goal for reducing checks. GSA is still asking agencies to continue to reduce as much as possible. ICs should continue to reduce convenience check usage by number of checks written and dollar volume.
  3. GSA SmartPay Forum - The upcoming GSA SmartPay training Forum is scheduled to take place sometime in August. Information on registration was previously sent to the ICs. The forum is not intended for cardholders; however, IC Coordinators are encouraged to register.
  4. HHS Updates – A release date for the new HHS Guide has not yet been provided. We will continue to keep the ICs informed of any new developments.
  5. OIG Annual Risk Assessment – As part of the Charge Card Abuse Act, OIG is required to do an annual assessment across all agencies. Findings revealed that most opdivs were found to be of moderate risk. One factor for NIH that was looked at was ensuring IC Coordinator reviews. The Purchase Card Program is working to develop a structured process for reviews that can be

utilized across ICs. The program office will keep the ICs informed of any new developments, but in interim, IC Coordinators should continue conducting their own internal reviews of their cardholders and CAOs.

6. FY16 Year End – FY16 dates year-end dates have been tentatively scheduled. More information to come once the dates are finalized.
7. MD Tax Exempt Form – The MD tax exempt form has an outdated address for OALM. We are working to update the form and will publish it on the website once available.
8. Reminder of Separation of Duties and Prompt Cancellation of Cards – ICs are reminded that cards must be cancelled in a timely manner prior to the cardholder leaving the IC or NIH. Cards that are not cancelled in a timely manner increase the risk of fraud to NIH. ICs must work with their cardholders and CAOs to ensure that cards are promptly cancelled and then notify the purchase card office of the cancellation. The necessary cancellation paperwork should be sent to finalize the card cancellation process. Additionally, ICs must continue to exercise separation of duties when submitting new cardholder and CAO applications to the program office for review. The number of purchase card roles assigned to an individuals should be minimized if possible (e.g. cardholder, CAO, IC Coordinator, checkwriter, etc.) The purchase card office will continue to monitor new requests to ensure that separation of duties are exercised prior to processing and will request additional information from the IC as necessary.

The meeting was adjourned at 11:30 PM. The next IC Coordinator meeting is scheduled for June 16, 2016 from 9:30 am to 11:30am.