



National Aeronautics and
Space Administration

NASA Shared Services Center
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39529-6000
www.nssc.nasa.gov

NASA Shared Services Center Process Work Instruction

NSPWI-5100-0006 Revision 5.0

Effective Date: September 21, 2022
Expiration Date: September 20, 2023

NASA Purchase Card Escalation Process - FOR NSSC INTERNAL USE ONLY -

Responsible Office: Office of Procurement

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SUBJECT: NASA Purchase Card Escalation Process		

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DOCUMENT HISTORY LOG

Status	Document Version	Effective Date	Description of Change
Basic	1.0 – 4.0	Various Dates	<i>See Revisions (Basic – 4.0) for prior log entries</i>
Revision	5.0	09/21/22	<ol style="list-style-type: none"> 1. Updated “Chief, Procurement Services” to “NSSC Procurement Officer” 2. Updated to align with the DRAFT PCPI that HQ OP’s provided on 5/26/22 <ul style="list-style-type: none"> • Removes the verbiage previously on page 6, Section 3.0, Roles and Responsibilities. • Changed Section 3.0’s title to “Consequences of Cardholder’s or Approving Official’s PCPI Non-compliance” and updated all of the language • Removed 889 offenses in Section 3.0 • Added “within the calendar year” throughout Section 3.0 • Linked the “NASA Desk Guide for Table of Disciplinary Offenses”

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1.0 Background and Purpose

The NASA Purchase Card Escalation Process outlines the detailed steps which will be taken by the NSSC Purchase Card (P-Card) Team when instances of misuse, abuse, fraud and/or any violation of the NASA Purchase Card Procedures and Instructions (PCPI) are detected when using the Government-issued purchase card.

Misuse includes accidental or unintentional usage of the purchase card (for example, mistakenly using the purchase card instead of the personal credit card or Government travel card). A series of seemingly incorrect/accidental purchases may require additional scrutiny to determine whether these purchases are unauthorized purchases.

The escalation process ensures that the Agency Program Coordinator (APC) and NSSC P-Card Team:

- 1) Notifies the cardholder, the approving official, and the NSSC Procurement Officer (as appropriate) when a violation occurs;
- 2) Documents the finding in the Cardholder's or Approving Official's file in order to track repeat offenses;
- 3) Ensures that corrective actions are taken immediately (if applicable);
- 4) Prevents further instances of this nature from occurring; and
- 5) Keeps the Agency in a minimum state of risk, maintain a positive perception of the Agency in the taxpayer's opinion, and prevent or minimize financial harm to the Agency.

2.0 Identification Objectives

Identification of purchase card violations occur in a variety of ways, to include but not limited to:

- 1) Notification by one of the Centers' Subject Matter Experts (SMEs), e.g. Property, Center Chief Information Officers (OCIOs);
- 2) Transaction and desk audits conducted by the NSSC P-Card Team;
- 3) Audits performed by either internal or external entities to NASA
- 4) Approving Official reviews of cardholder's transactions

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3.0 Consequences of Cardholder's or Approving Official's PCPI Non-compliance

The Agency Program Coordinator (APC) will follow the escalation process, detailed as follows:

- 1) **For the first and second violations of the PCPI within the calendar year**, the APC will email the affected Cardholder (CH) or Approving Official (AO) along with a courtesy copy to the CH's AO or AO's direct supervisor, as applicable.
- 2) **If a third violation is discovered for a CH within the calendar year**, the CH's account will be suspended for a period of 3-months. **If a third violation is discovered for an AO**, the AO will lose their role as an approving official for a period of 3-months. In addition, the suspended CH or AO will be required to retake all requisite P-Card training prior to the reactivation of their account or AO role.

The suspended CH's AO or the suspended AO's direct supervisor, as applicable, will be responsible for taking disciplinary action in accordance with the [NASA Desk Guide for Table of Disciplinary Offenses](#), as appropriate.

The suspended CH's AO shall be responsible for reconciling and approving any outstanding order logs the CH has in the P-Card Application.

Each CH's and AO's violation record will be reset to zero violations at the beginning of each calendar year.

- 3) **If a CH or AO is suspended for a second time within a 2-year period**, the APC, in conjunction with HQ-OP, will decide whether to permanently ban the CH or AO.
- 4) **When an AO is suspended, it could also result in one or more of the following actions:**
 - (a) Closure of the P-Card account(s) that fall under the AO's responsibility on a temporary basis until another AO is nominated and trained;
 - (b) Permanent closure of the P-Card account(s) that fall under the AO's responsibility; or
 - (c) The AO's direct supervisor taking disciplinary action in accordance with the [NASA Desk Guide for Table of Disciplinary Offenses](#), when appropriate.