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NASA Shared Services Center Process Work Instruction

NSPWI-5100-0006 Revision 4.0

Effective Date: **September 21, 2021**
Expiration Date: **September 20, 2022**

NASA Purchase Card Escalation Process

- FOR NSSC INTERNAL USE ONLY -

Responsible Office: Office of Procurement

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DOCUMENT HISTORY LOG

Status	Document Version	Effective Date	Description of Change
Basic	1.0	02/25/2019	Basic release
Revision	2.0	03/16/2020	Updated the document in its entirety.
Revision	3.0	03/16/2021	Changes include: 1. Section 3.0 for the NSSC P-Card Team 2. Section 889 3. Combined some sections and re-worded portions for simplicity / ease of understanding
Revision	4.0	09/20/2021	1. Page 6, 3.0: Added #11: "Approving Officials' failure to respond to a transactional audit, in the event his/her Cardholder has left NASA." 2. Page 7: Updated "For the first and second violations of the PCPI" to <i>"For the first and second violations of the PCPI or Section 889 guidance"</i> 3. Page 7, #2 Added: "The Cardholder's AO will also be responsible for reconciling and approving any outstanding order logs the Cardholder has in P-Card Application." 4. Page #7 ** Exceptions to this include: Removed #2 regarding 889 3-month suspensions. This will now be considered a violation.

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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 Chief, Procurement Services (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 Roles and Responsibilities

When any Center SME identifies an instance of purchase card misuse, abuse or fraud, they shall contact the NSSC P-Card immediately with the following information:

- 1) The Cardholder's name
- 2) The PC order log number and any other pertinent information
- 3) The violation that occurred

The Approving Official (AO) is responsible for conducting independent reviews of cardholder records and transactions to ensure purchases are appropriate, authorized, for Government use only, and within the cardholder's delegated authority. The AO shall be responsible for taking disciplinary action against cardholders in accordance with the NASA Desk Guide for Table of Disciplinary Offenses*, when appropriate, as well as reporting suspected misuse and/or fraudulent or potentially fraudulent activity, to the NSSC P-Card Team and Center Acquisition Integrity Program (AIP) official. (PCPI Section 2.5)

When the NSSC P-Card Team discovers that the following violations have occurred (to include, but not limited to those listed below), they will inform the APC immediately:

- 1) Approving Official's failure to approve Cardholder's reconciled transactions in a timely manner (PCPI Section 2.5)
- 2) Cardholder exceeding his/her single purchase limit or monthly purchase limit (PCPI Section 2.8)
- 3) Cardholder's failure to reconcile or dispute transactions promptly (PCPI Section 2.8)
- 4) Failure to maintain required training (PCPI Section 7.6)
- 5) Procuring prohibited items (PCPI Section 8.0)
- 6) Splitting purchases (PCPI Section 9.0)
- 7) Failing to obtain required special approvals prior to making the purchase (PCPI Section 11.2)
- 8) Erroneous/Improper purchases (intentional and unintentional) (PCPI Section 13.2)
- 9) Misuse of the purchase card by allowing others to use the Government-issued purchase card (PCPI Section 15.7)
- 10) Failure to comply with the Section 889 requirements
- 11) Approving Officials' failure to respond to a transactional audit, in the event his/her Cardholder has left NASA

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

- 1) **For the first and second violations of the PCPI or Section 889 guidance****, the APC will email the affected individual (Cardholder *or* Approving Official) with a courtesy copy to the respective Approving Official (if applicable).
- 2) **If a third violation is discovered for a Cardholder**, the cardholder's account will be closed.

The Cardholder's AO will be responsible for taking disciplinary action in accordance with the NASA Desk Guide for Table of Disciplinary Offenses*, when appropriate.

The Cardholder's AO will also be responsible for reconciling and approving any outstanding order logs the Cardholder has in P-Card Application.

- 3) **If a third violation is discovered for an Approving Official**, the Approving Official will lose his/her role as an AO. This could also result in either:
 - (a) Closure of the purchase card account(s) on a temporary basis that fall under the Approving Official's responsibility until another Approving Official is nominated and trained *or*
 - (b) Closure of the purchase card account(s) on a permanent basis that fall under the Approving Official's responsibility.

The AO's supervisor will be responsible for taking disciplinary action in accordance with the NASA Desk Guide for Table of Disciplinary Offenses*, when appropriate.

* The NASA Desk Guide for Table of Disciplinary Offenses can be found here: https://searchpub.nssc.nasa.gov/servlet/sm.web.Fetch/NDG03_TableofPenalties.pdf?rhid=1000&did=778169&type=released

** Exceptions to this include:

If card abuse or fraud is involved, the Chief, Procurement Services, Center Human Resources and Center Office of Inspector General (OIG) will also be notified. The card can be suspended or cancelled.