



DEPARTMENT OF THE NAVY
COMMANDER, NAVY INSTALLATIONS COMMAND
716 SICARD STREET, SE, SUITE 1000
WASHINGTON NAVY YARD, DC 20374-5140

CNICINST 4200.3
N8
3 January 2013

CNIC INSTRUCTION 4200.3

From: Commander, Navy Installations Command

Subj: CNIC GOVERNMENT COMMERCIAL PURCHASE CARD PROGRAM POLICY

Ref: (a) NAVSUPINST 4200.85D
(b) NAVSUPINST 4200.99B
(c) Federal Acquisition Regulations Part 13
(d) Defense Federal Acquisition Regulations 213
(e) General Services Administration Contract Number
GS 23F T0003
(f) USD (P&R) Memo, Government Charge Card Disciplinary
Guide for Civilian Employees, 21 Apr 03
(g) USD (P&R) Memo, Disciplinary Guidelines for Misuse
of Government Charge Cards by Military Personnel,
21 Apr 03
(h) SECNAV M-5210.1

Encl: (1) CNIC Government Commercial Purchase Card Program
POLICY

1. Purpose. To establish policy, procedures, and responsibilities for Commander, Navy Installations Command (CNIC) Government Commercial Purchase Card (GCPC) program. Current Department of Navy (DON) policy was issued in references (a) and (b) regarding use of the government purchase cards. This instruction shall be supplemented with Activity Internal Operating Procedures (IOPs). All purchases must be accomplished in accordance with references (c) and (d).

2. Background. The General Services Administration (GSA) Federal Supply Services (FSS) awarded reference (e) to Citibank for GCPC services. The contract provides, at the request of federal ordering agencies, GCPCs and associated services for civilian and military government employees to make purchases for official government use. The DON Consolidated Card Program Management Division (CCPMD) has responsibility for GCPC program policy. All DON activities using the program must comply with the provisions of references (a) and (b). References (f) and

(g) require that procedures be established for dealing with improper, fraudulent, abusive, negligent, or unauthorized use of government purchase cards.

3. Policy. Enclosure (1) is CNIC's GCPC program. The intent of this instruction is not to modify, delete, or in any way relieve an activity or individual from the responsibility to comply with all applicable acquisition regulations, directives, and procedures.

a. CNIC policy is to use the GCPC program as a method of procurement for purchases at or below the micro-purchase level, currently \$3,000, and as a method of payment on contracts awarded by a qualified contracting officer or ordering officer.

b. This instruction provides Region Commanders (REGCOMs) and installation Commanding Officers (COs) the flexibility to develop operational procedures aligned to their specific mission. Commanders and COs will develop GCPC operational procedures, applicable to their mission, in an Activity IOP document.

4. Responsibilities. Heads of Activity, APCs, Approving Officials/Certifying Officers, Cardholders and Financial Managers are responsible for adhering to the roles and executing the responsibilities listed in enclosure (1).

5. Action. CNIC Headquarters N-Codes, Special Assistants, Region Commanders, and installation COs shall execute enclosure (1).

6. Records Management. Records created as a result of this instruction, regardless of media and format, shall be managed in accordance with reference (h).


W. D. FRENCH
Vice Admiral, U.S. Navy

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3 Jan 2013

CNIC GOVERNMENT COMMERCIAL PURCHASE CARD PROGRAM1. Introduction

a. General Services Administration (GSA) Federal Supply Service (FSS) awarded contract GS-23F-T0003 for Government Commercial Purchase Card (GCPC) services to Citibank. The contract provides, at the request of federal ordering agencies, GCPCs and associated services for civilian and military government employees to make purchases for official government use. The GCPC is intended to streamline small purchase methods, minimize paperwork, streamline payment processes, and simplify the administrative effort associated with simplified acquisition procedures.

b. CNIC policy is to use the GCPC as the method of payment for purchases not exceeding \$3,000, the method of payment for orders against government-wide contracts exceeding the micro-purchase threshold up to \$150,000, and the method of payment on contracts issued by a contracting officer or ordering officer. CNIC Comptroller (N8) is designated as the Hierarchy Level III Agency Program Coordinator (APC) that will oversee CNIC's GCPC program.

c. The Citibank purchase card may be used to purchase supplies and services when authorized in accordance with references (a) through (d), Head of Contracting Agency (HCA) instructions, and local operating procedures. The card may also be used to order directly from government-required sources (e.g., GSA stock, Federal Prison Industries (FPI), Document Automation and Production Service (DAPS)) up to \$100,000. Open market purchases can be made only when requirements cannot be obtained from the required government sources of supply listed in Federal Acquisition Regulations (FAR) 8.001 and Defense Federal Acquisition Regulation (DFAR) 208.70. Without exception, GCPC may only be used for authorized United States Government purchases.

d. The purchase card may be used as a payment method for contractual instruments authorized by the contracting or ordering officer, all commercial training requests valued at or below \$25,000 using Standard Form for Authorization, Agreement and Certification of Training (SF 182), and all government printing requests accomplished on DoD Printing/Requisition Order (DD 282)not to exceed \$100,000.

Enclosure (1)

2. Roles and Responsibilities

a. The Head of Contracting Activity (HCA)(otherwise known as Naval Supply Systems Command) is responsible for:

(1) Issuing GCPC contract authority to Department of Navy (DON) component commands and activities.

(2) Ensuring compliance with issued authority.

(3) Determining procedures for issuing and ensuring compliance with GCPC authority.

(4) Conducting periodic management reviews of the purchase card program.

b. Heads of Activity (HAs)(otherwise known as CNIC Headquarters, Region Commanders, and Installation Commanding Officers) are responsible for:

(1) Determining the need for a GCPC program and initiating a request to the appropriate HCA to establish a GCPC program.

(2) Appointing qualified personnel to perform GCPC program duties and supporting or sponsoring all participants in the purchase card program.

(3) Ensuring management control and adequate supporting resources are in place for proper use of the GCPC.

(4) Overseeing program performance and maintaining accountability for management of the command's or activity's purchase card program.

(5) Ensuring appropriate administrative and disciplinary action is taken when fraudulent, improper, or abusive purchase card transactions are found.

(6) Delegating responsibilities within their chain of command to another qualified individual where appropriate.

(7) Ensuring that they or their delegated official complete HA training prior to signing the semi-annual review.

c. Hierarchy Level (HL) III APCs are responsible for:

(1) Managing the GCPC program on behalf of the HA at the command level.

(2) Serving as liaison with DON Consolidated Card Program Management Division (CCPMD) and Citibank on program issues.

(3) Reviewing, analyzing, and providing recommendations to CCPMD on improvements to GCPC processes and procedures.

(4) Providing program management and oversight of CNIC's GCPC program.

(5) Communicating and providing technical assistance to lower-level APCs and program participants.

(6) Establishing and maintaining CNIC Headquarters and subordinate command program hierarchy.

(7) Reviewing and testing proposed enhancements to the GCPC program.

(8) Participating with CCPMD in formatting long-range plans and policies for expanding the GCPC program.

(9) Establishing management controls and accessing controls to provide reasonable assurance that they are effective.

(10) Monitoring GCPC program, accounts, payments, delinquencies, and credit balances.

(11) Conducting monthly, quarterly, and semi-annual reviews and audits, and advising the HA on program performance.

d. HL IV/V APCs are responsible for:

(1) Managing the GCPC program on behalf of the HA at the region/installation level.

(2) Implementing GCPC program management policy on behalf of the HA.

(3) Performing day-to-day oversight of the GCPC program.

3 Jan 2013

(4) Coordinating card applications, issuance and destruction of cards, reports, and administrative training.

(5) Developing an internal operating procedure (IOP), policies, procedures, training, and communication with all lower-level program participants specific to the organizations they oversee.

(6) Establishing and maintaining their activity GCPC program hierarchy.

(7) Maintaining an individual file for each program participant.

(8) Retaining participants' files for the duration of service and 3 years beyond.

(9) Participating in GCPC pilot programs, submitting monthly, quarterly, and semi-annual reviews, and briefing HA on program issues.

e. Approving Officials/Certifying Officers (AOs/COs) are responsible for:

(1) Providing the first line of defense in preventing misuse, abuse, and fraudulent use of the GCPC.

(2) Being nominated by their immediate supervisor to the APC.

(3) Ensuring the proper use of the purchase card on the part of cardholders (CHs) within their purview.

(4) Reviewing purchase documentation to validate that transactions are complete, accurate, legal, mission-essential, and correct in accordance with government rules and regulations.

(5) Enforcing provisions of the IOP and initiating administrative and disciplinary procedures for misuse, fraud, or abuse of the card.

(6) Certifying monthly billing statements in accordance with reference (b) for CHs under their purview, and forwarding it to the appropriate office for payment.

3 Jan 2013

(7) Resolving questionable purchases with the CH and notifying the APC of any improper purchases. The AO and the CH can be liable for repayment of a transaction that: is determined to be illegal, improper, or incorrect because of an inaccurate or misleading certificate; is prohibited by law; or does not represent a legal obligation under the appropriation or fund involved.

f. Cardholders (CHs) are responsible for:

(1) Using the GCPC to acquire authorized supplies or services in accordance with their delegated authority.

(2) Being nominated by the requesting department or division. This delegation will specify the single purchase limit, the billing cycle purchase limit, and the transaction types authorized.

(3) Being appointed on an SF-1402 (Certificate of Appointment) if their procurement authority exceeds the micro-purchase threshold.

(4) Using the card to purchase authorized goods and services only. Supplies and services must be purchased from required sources in accordance with references (a) through (d).

(5) Using the card ethically and observing authorized dollar limits on purchases to include any additional charges (e.g., shipping, currency exchange fees).

(6) Maintaining a log of all their transactions and obtaining receipts of all purchases.

(7) Reconciling all bank statement transactions with their purchase logs and submitting to AO/CO within the timeline specified in reference (b).

(8) Securing GCPC information by keeping the purchase card in a safe and secure location.

(9) Not allowing others to use their GCPC, and immediately reporting to their APC and Citibank if their card is lost or stolen. NOTE: In this and all further references to APC, cardholders are always assigned to a level 5 APC. Therefore, when "APC" is mentioned in relation to Cardholder responsibilities, it refers to APC Level V.

(10) Returning their card in accordance with their activity IOP upon transfer, departure, or retirement.

g. Financial Managers (FMs) are responsible for:

(1) Authorizing funding and providing financial management support.

(2) Providing notification of funding to program personnel and providing the APC with lines of accounting for the GCPC program.

(3) Ensuring funds are committed and obligations are recorded in the accounting system.

(4) Ensuring all exception output from Standard Accounting and Reporting System-Field Level (STARS-FL) is corrected, and assisting the APC with GCPC accounting issues.

3. Training

a. All program participants are required to complete annual Ethics training. This training can be accomplished via <https://DoNogc.navy.mil/Ethics/>. Recommend accessing CCPMD website at <https://www.navsup.navy.mil/ccpmd> if in doubt as to the most recent Department of Defense (DoD) and DON ethics training materials.

b. Prior to issuance of a purchase card, all prospective CHs and cognizant AOs must receive training on the credit card program and local operating procedures. The APC will provide information and basic instructions to CHs and AOs on how to use the card in accordance with their established policy.

c. Refresher training is required at least every 2 years for program participants involved in the process, to ensure compliance and understanding of contracting authority and local operating procedures.

d. In addition, the APCs, prospective CHs, and AOs must successfully complete the following:

(1) DON purchase card training associated with their function in the program and the on-line test via the CCPMD

website at:

https://www.navsup.navy.mil/ccpmd/purchase_card/training.

(2) Defense Acquisition University (DAU), DoD Government Purchase Card CLG 001 via DAU homepage at:

https://www.navsup.navy.mil/ccpmd/purchase_card/training.

(3) DAU, Simplified Acquisition (SAP) CON 237 for CHs who will be issued a SF-1402 to accomplish delivery orders on DoD EMALL, FPI, indefinite delivery-type contracts (IDTCs), and against GSA schedules exceeding the micro-purchase threshold up to \$150,000.

e. All participants shall review and retain the DON purchase card program desk guide applicable to the function they have been designated to perform. Desk guides are available from the DON CCPMD website at: <https://www.navsup.navy.mil/ccpmd>.

f. A copy of all training certificates will be provided to the APC.

4. Financial Disclosure Report (OGE 450). CHs who purchase in excess of \$150,000 per fiscal year and AOs or certifying officers who approve or certify in excess of \$150,000 per fiscal year must complete form OGE-450 (Confidential Financial Disclosure Report).

5. Account Set-Up. APCs shall establish accounts based on accountholder and activity-delegated authority. Prior to setting up accounts, the APC shall verify that required training and delegations have been completed.

6. Dollar Limits Associated with the Card. Use of the purchase card by a CH is subject to a single purchase limit, a monthly cardholder limit, and a monthly office limit. These limits are established in each cardholder delegation-of-authority letter. The single purchase limit cannot be exceeded unless authorized by the APC.

7. Card Security

a. It is the CH's responsibility to safeguard the purchase card and account number at all times. The CH shall not allow anyone to use his/her card or account number. A CH who permits his/her GCPC or GCPC account number to be used by another person

shall have his/her card account closed and shall be subject to disciplinary action.

b. Credit cards will be kept under lock and key when not in use. This action will assist in assuring the GCPC is not accidentally used for personal transactions.

8. Lost or Stolen Cards

a. Telephone Notification. If the card is lost or stolen, it is important that the CH immediately notify Citibank by calling 1-800-790-7206.

b. Written Notification. The CH must also notify the AO and the APC of the lost or stolen card within one work day after discovering the card missing. The AO will submit a written report to the APC within 1 workday. The report will include:

- (1) Last six digits of the card number
- (2) CH's complete name
- (3) Date and location of the loss
- (4) If stolen, date reported to police
- (5) Date and time Citibank was notified
- (6) Any purchase(s) made on the day the card was lost or stolen
- (7) Any other pertinent information

c. Card Replacement. Citibank will mail a replacement card within 1 business day of the reported loss or theft. A card that is subsequently found by the CH after being reported lost or stolen will be cut in half and given to his/her AO or the APC. The APC will notify Citibank that the card has been destroyed.

9. Transfer of Accounts. Transferring cardholder accounts from one AO to another is prohibited. Instead, the cardholder account shall be closed and a new cardholder account shall be established under the desired AO account. AO accounts shall not be transferred from one HL5 hierarchy to another; instead the account must be reconciled to a zero balance, closed, and a new AO account opened under the new HL5 hierarchy.

3 Jan 2013

10. Inactive Accounts. Cardholder accounts that have not been used for a 6-month period shall be closed unless an acceptable justification to keep them open is provided to APC.

Justifications may include, but are not limited to, contingencies, deployments, extended leave, or temporary disability. The handling of inactive accounts should be addressed in the Activity IOP.

11. Closing Accounts. The APC shall ensure, to the maximum extent possible, that the cardholder account is inactive at least 30 days or one billing cycle prior to the transfer, retirement, or removal. Upon departure, the CH must surrender the card to his/her AO or APC. The APC will cancel the account via the CitiDirect® website. AO accounts shall not be closed until all cardholder accounts have been closed, the invoice has been paid, and the AO account is reconciled to zero balance.

12. Restrictions on the Use of the Purchase Card. There are some instances where the purchase card may not be used. A list of Prohibited and Special Attention Items can be found in reference (b). Not all items are prohibited. Some items require special approvals. Certain items on the prohibited list can in fact be paid for with the purchase card if all of the necessary terms and conditions are met. Others may be purchased using transitional methods and paid for using the purchase card.

13. Improper, Fraudulent, Abusive, Negligent, or Unauthorized Use of a Purchase Card. Improper, fraudulent, abusive, negligent, or unauthorized use of a government purchase card is prohibited. Such prohibited uses include: use of a purchase card by any person other than the CH whose name appears on the purchase card; use of the card for purposes that are not official business; use for purposes prohibited by references (a) through (d); use in violation of regulation or law; and use of a purchase card by a CH in excess of his or her delegation of authority. Supervisors who receive information indicating that a subordinate has engaged in any misuse of a government purchase card shall take appropriate action, including an investigation. The circumstances of each individual case will determine the appropriate type of corrective or disciplinary/adverse action, if any, that may be imposed. References (f) and (g) provide guidance applicable to civilian and military employees, and provide examples for penalties for such offenses.

14. Purchase Procedures

a. Prior to soliciting a quotation, the CH must have an adequately prepared and properly approved purchase request that has been technically screened for the use of required sources of supplies.

b. The purchase card will only be used to purchase supplies if requirements cannot be satisfied through required sources listed in FAR Part 8.001 priorities for use of government supply sources. The CH is responsible for screening for required government sources. Federal Prison Industries (FPI) must be a considered for all requirements above the dollar micro-purchase threshold.

c. The CH will solicit a quotation from the merchant. When more than one quote is obtained for a purchase request over the micro-purchase limit, the CH must document the merchant's quote on a Purchase Documentation Worksheet. Reference (a) contains requirements for creating such a worksheet. If the merchant's price is fair and reasonable, the CH may proceed to purchase the supplies. This may be accomplished in one of several ways:

(1) Over the Counter. The CH goes to the merchant's place of business to make the purchase and the supplies are immediately available.

(2) Over the Phone. Orders are placed by phone and the contractor delivers the supplies to the activity, or government pick-up is authorized.

(3) Via the Internet. When purchasing or ordering via the Internet, all CHs will ensure that appropriate account safeguarding measures are taken. All purchases and orders will be approved by the CH's AO. The AO has the authority to pre-approve recurring requests to prevent procurement delays.

d. The CH must confirm, as part of the award process, that the merchant agrees:

(1) Not to charge the purchase card account until all items are shipped or, if partial quantities are shipped, to bill only for the quantity shipped.

(2) Not to back-order items.

3 Jan 2013

(3) To deliver, or have available for pick-up, all items no later than 30 days from the date the items were billed.

(4) To provide invoice, shipping document, or packing list with the following information:

(a) Merchant's name and address

(b) Purchase request number

(c) Itemized list of supplies furnished, including quantity, unit price, extended amount, and total cost of order

e. Merchants should be reminded not to charge sales tax unless the location of the merchant's business is in a state that does not afford the Federal Government a tax-exempt status under its state and local laws (e.g., Arizona, Hawaii).

f. A purchase card log will be used to record all purchase card transactions. The purchase card documentation should provide an audit trail supporting the decision to use the card and any required special approvals that were obtained. The documentation should be held until the monthly billing statement is received and then attached to the statement when it is submitted to the AO.

15. Reconciliation and Payment Procedures. Records of each purchase shall be kept to perform a reconciliation of purchase with the cardholder monthly statement. Records shall also be kept to provide an audit trail supporting the decision to use the GCPC and any required special approvals that were obtained.

a. The CH shall complete the reconciliation process within 5 working days after the statement changes from "interim" to "new." The CH will follow pay and confirm procedures if items shipped are not received at the time of reconciliation.

b. The CH must sign the statement and forward the signed statement and all documentation to the AO/CO. The CH will ensure that each transaction has the required documentation in accordance with reference (b), for AO/CO review and future audit.

c. The AO/CO will reconcile the cardholder monthly statement with the Citibank statement, ensure all purchases are

3 Jan 2013

appropriate and accurate, and validate supporting documentation on all transactions.

d. The AO/CO will ensure that proper receipt, acceptance, and inspection are accomplished from receipt of the CH's signed statement, and will certify within 5 days.

16. Contract Payments. Purchase Card Method of Payment (PCMP) against contracts issued by a contracting agency or ordering officer will be paid utilizing Obligating Procurement Type Indicator-Contract (OPTI-C) when stipulated in the contract. Payment with OPTI-C purchase call will prevent double obligations.

a. The CNIC N-822 Invoice Management CH holds the OPTI-C purchase cards and is responsible for making GCPC payments against contracts.

b. N-Code Directors and Special Assistants are required to ensure that invoices for new contracts and existing contracts are paid with OPTI-C. Funding documents should cite that payment will be made with the government purchase card. Invoices should be sent to the following address:

Commander, Navy Installations Command
Attn N00052/PCMP
1837 Morris Street
Norfolk, VA 23511

17. Shipment Delivery and Receipts. References (a) and (b) require that original signed receipts for supplies and services rendered be placed into the cardholder transaction files. These receipts allow proper reconciliation of monthly GCPC billing statements.

a. The individual who accepts delivery of shipment from the delivery service will give the package to the requestor or recipient indicated on shipment within 1 business day or as soon as possible. The individual who accepts the package from the vendor or carrier will be held financially liable if the package is lost or stolen while in his or her possession.

b. Receivers shall inspect items, verify the vendor's receipt against a valid request, and sign the receipt legibly (print and sign name, and enter date). The receipt must be counter-signed by the receiver's supervisor to prevent fraud.

3 Jan 2013

If the receiver and requestor are two different people, it is the requestor's responsibility to make sure that the CH gets the receipt.

c. If an original receipt is not included with the shipment, the receiver will fill out a Substitute Receipt Document (available on the CNIC HQ portal, Gateway 2.0, at <https://g2.cnic.navy.mil/TSCNICHQ/N8/N82/default.aspx> under Shared Documents). This document must be completely filled out, legibly signed, dated, and sent along with other receipts at least weekly to the CH.

d. Regions are strongly encouraged to implement local procedures to ensure that receipts are provided to CHs. CNIC's GPCP is at risk if the command does not mandate proper receipt documentation from requestors or receivers. CNIC recommends a loss of purchase card services for those N-Codes that cannot or will not provide receipt documentation to cardholders.

18. Record Retention. Purchase card related records, such as purchase card logs, purchase requests, supporting documentation, monthly invoices, and statements must be retained by the APC or AO for a minimum of 6 years and 3 months.

19. Internal Review of GCPC Program. Program oversight includes monthly, quarterly, and semi-annual reviews to ensure effectiveness and management of internal controls. Monthly review provides effectiveness of management controls to mitigate program risk. Quarterly reviews focus on verifying program participants. Semi-annual reviews are performed at the end of the March and September billing cycles and are a consolidation of the previous six monthly reviews.

a. Monthly Review. Monthly reviews are performed using the approved DON Program Audit Tool (PAT) in the CitiDirect® Card Management System (CCMS). The monthly review consists of a review of transactions, training, accounts, delinquencies, and spans of control to ensure the effectiveness of program management and internal controls.

(1) The Level V APC shall conduct or oversee/manage the monthly transactional review. The review shall include all of the purchase card transactions within the previous month for all card accounts under the APC's cognizance (i.e., 100 percent transaction review). Results shall be available within the PAT

to the Commanding Officer or HA and Level III and 4 APCs on a monthly basis.

(2) This process, at a minimum, shall consist of viewing all transactions not identified by the PAT by choosing the "Add Transaction" button. The Level V APC shall review the transactions not selected by PAT filters. Transactions that the APC Level V deems needing AO review shall be added to the PAT. The AO will be required to respond to the added transaction as if the PAT had generated the transaction for review.

(3) PAT monthly reviews will be completed within the following timeframes:

(a) AOs will have 15 calendar days after the billing cycle to complete and submit their review to the Level V APC.

(b) Level V APCs will have 10 calendar days after the AO due date to complete and submit their review to the Level IV APC.

(c) Level IV APCs will have 10 calendar days after the Level V APC due date to complete and submit their review to the Level III APC.

(d) Level III APCs will finalize the review and electronically submit it to CCPMD by the 15th of each month.

(4) If the activity's PAT review is not submitted by the due date, the HA and Level IV and 5 APCs will be notified via e-mail that the PAT submission was not received in accordance with CNIC policy. The activity will then have 3 calendar days to submit their PAT responses. Failure to submit the PAT review within the 3 calendar days will result in the activity's Level V purchase card program being suspended by the CNIC Level III APC until the review is submitted.

b. Quarterly Review. On a quarterly basis, HL5 APCs shall compare their entire cardholder listing against the command's official personnel roster and close any cardholder accounts not verified by their personnel office.

c. Semi-Annual Review. The semi-annual review is required to ensure adherence to internal controls and ensure the HA is involved in each activity's GCPC program. The semi-annual review is performed by the APC Level V using the PAT tool, and

3 Jan 2013

is an aggregate of the activity's monthly reviews for the past 6 months. Results are briefed to the HA and then reported to the APC at the hierarchy level directly above the reporting APC .

(1) The semi-annual review will be completed as follows:

(a) The HL5 APC shall report to the Commanding Officer/HA on all actions taken on all deficiencies noted. HL5 is required to provide the HA the "Commanding Officers Management Report" for review. A signed statement that the Commanding Officer/HA reviewed all findings and concurs with the disciplinary actions taken on any noted findings is required to be sent to the Level III APC for semi-annual review compliance.

(b) HL4 APCs will summarize the reports provided by the activity APC below them, review results with their HA, and submit a consolidated report to their HL3 APC.

(c) HL3 APC will consolidate command semi-annual review results, brief the HA of review results, and submit a consolidated HL3 semi-annual review report to CCPMD by 15 June and 15 December.

(2) If the activity's semi-annual review is not submitted by the due date, the Commanding Officer/HA and Level IV APC will be notified via e-mail that the semi-annual review submission was not received in accordance with CNIC policy. The activity will have 3 calendar days to submit its semi-annual review. Failure to submit the semi-annual review within the 3 calendar days will result in the activity's Level IV purchase card program being suspended by the CNIC Level III APC until the review is submitted.

20. Disciplinary Guidelines. It is CNIC policy that improper, fraudulent, abusive, or negligent use of the GCPC is prohibited. This includes use for purposes that are inconsistent with the official business of CNIC or with applicable regulations. The intent of this policy is to ensure that management emphasis is given to the important issue of personal accountability for GCPC fraud, misuse, and abuse. There is no intent to deprive managers and supervisors of their discretion in handling GCPC misuse in a manner appropriate to each individual case. Violation of this instruction by military members may result in disciplinary action under the Uniform Code of Military Justice

3 Jan 2013

a. HAs/Commanders shall use references (f) and (g) as the authoritative guidance to establish disciplinary guidelines. They shall ensure that supervisors take timely and appropriate disciplinary action, and that suspected misuse, abuse, and fraud of the GCPC are appropriately investigated.

b. AOs/COs shall ensure all purchases made by CHs within their purview are appropriate and bona fide, and all charges are accurate. They shall notify their APC immediately upon discovery of any misuse, abuse, or potential fraud.

c. The APC shall monitor Citibank's system to identify potential GCPC misuse, abuse, or fraud. The HL5 APC shall notify an employee's supervisor, HL4, and HL3 APC immediately in instances of suspected misuse, abuse, or potential fraud.

21. Standards of Conduct. CNIC civilian and military employees hold a public trust; their conduct must meet the highest ethical standards. All CHs will use the GCPC only to purchase supplies within the guidance of this program. CHs and AOs should be aware that making false statements on purchase card records may subject them to disciplinary action, up to and including removal, as well as to criminal prosecution under Title 18, United States Code, or under the Uniform Code of Military Justice for military personnel.