

PCPN# FY04-30 - Purchase Card Program - Approving Official (AO) cannot be same person as Agency Program Coordinator (APC)

Note: Level 3 APCs - IT IS YOUR RESPONSIBILITY TO GIVE THIS NOTICE WIDEST DISSEMINATION TO PROGRAM PARTICIPANTS TO INCLUDE APCs, AOs AND CHs IN YOUR HIERARCHY.

The AO is the first line of defense against misuse, abuse and fraud. The AO is responsible for ensuring proper use of the purchase card through approval of purchases and certification of monthly invoices for payment for the cardholders within their purview.

Recommendations from audit groups, internal and external, show that proper separation of duties are not in place where the AO is the same person as the APC ensuring roles of individuals are not in conflict to manage local programs.

Effective 22 JUN 2004 (beginning of July 2004 cycle), the AO can no longer be the same person as the APC. This includes alternate positions as well.

In cases where commands have a limited number of personnel to execute the Purchase Card program, the activity will need to appoint someone outside of the supply/contracting office to serve as the role of the APC. Details on how to submit a waiver request will be sent out in a separate email.

Waiver Instructions:

To request an exception to this change in policy, a formal request must be made. The request for a waiver must state the following:

1. Activity Name
2. Activity Hierarchy Number (full string)
3. Name of person who would be in the position of AO and APC
4. Size of program
 - a. Average monthly number of transactions
 - b. Number of cardholders
 - c. Rating and date of last external audit review of card program
5. Reason why AO needs to be the same person as the APC
6. Steps in place that will ensure independent review (monthly and semi-annually)
7. Length of time needed for dual roles

The written request must go through the Level 3 APC for endorsement. The Level 3 APC shall forward the endorsement to the DON eBusiness Operations Office for review. Once reviewed by the DON eBusiness Office, a written response stating approval/denial will be sent back to the Level 3 APC.

Please send any questions/comments to purchase_card@navsup.navy.mil.

Helpdesk
DON eBusiness Operations Office
Card Management
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