

11-4. Data Mining Case Review and Closure

a. **DM Case Management.** Oversight Systems’ IOD DM capability evaluates each transaction against a set of tiered business rules to identify high-risk transactions. Tier 1 rules are mandatory and applicable to all DoD purchase cards. Tier 2 rules are mandatory rules that can be tailored as necessary at the local level. DM cases can be system-generated or manually generated. The system generates a DM case whenever a business rule is broken. GPC program officials are required to manually create cases for each finding and disciplinary category determination they independently identify during their reviews. Each case is adjudicated to determine if the transaction is to be classified under one of five disciplinary categories standardized in compliance with the DPCAP memo “Final Governmentwide Commercial Purchase Card Disciplinary Category Definitions Guidance,” January 27, 2020. Disputes are also categorized as determinations.

b. **Tier 2 Tailoring.** Tier 2 business rules are tailorable to meet the Army’s organizational needs. Tailoring must be consistent with requirements in the DoD Charge Card Guidebook. As part of the SAHAR process, HAs are required to validate that any Tier 2 Tailoring of DM business rules are implemented appropriately. For more information, refer to GPC one-pager 3OP034, “Tier 2 Tailoring in Insights on Demand (IOD)” on the DPCAP GPC website. To properly manage program risk for these potentially high-risk transactions, IOD automatically selects a random sample of 1% of these Tier 2 “auto closed” cases and assigns them for adjudication (“1% Random Reopen”). The IST reviews Tier 2 Tailoring data sets and trends and considers methodology changes based on its findings.

c. **Case Assignment and Review Process.**

- 1) IOD flags a transaction for review, generates a case, and assigns it to the primary BO.
- 2) The BO reviews the CH’s file documentation per section 6-2.g. The BO then locates the case in IOD and inputs requested data.
- 3) After the BO submits their review, IOD assigns the case to the Level 4 A/OPC. The Level 4 A/OPC reviews the CH’s file documentation, inputs comments about the purchase, identifies the applicable finding, and closes the case. The comments should provide information about the transaction and a detailed explanation of any findings. For administrative findings, the comments must state what documents or signatures were missing.

Tables 11-1 and 11-2 summarize the available options for Findings, Determinations, and Corrective Actions in IOD.

Table 11-1. GPC IOD Findings and Determinations

Findings	Determinations
<ul style="list-style-type: none"> • Not for Government Use (Personal Use) • Unauthorized Use • Prohibited Item • Split Purchase to Circumvent Authorized Limit • Exceeds Authorized Limits • Exceeds Minimum Mission Need • Failure to Screen/Use Required Sources when Applicable • Separation of Duties Not Performed • Sustainable (Green) Procurement Procedures Not Followed • Incomplete Purchase Records 	<p>Disciplinary Categories Involving Violations:</p> <ul style="list-style-type: none"> • Potential Internal Fraud (Malicious Intent) • Abuse (Intentional) • Misuse (Unintentional) <p>Disciplinary Category Involving No Violation:</p> <ul style="list-style-type: none"> • Administrative Discrepancy (Unintentional) • External Fraud
<ul style="list-style-type: none"> • No Findings Identified (Case Closed) 	<ul style="list-style-type: none"> • No Disciplinary Category Determination Necessary (Case Closed)

Table 11-2. GPC IOD Corrective Actions Taken/Planned

Corrective Actions Taken/Planned

- ☐ Elevate to investigative agency
- ☐ Elevate through chain of command
- ☐ Suspend or remove employee from program
- ☐ Reimbursement to program
- ☐ Formal supervisory counseling
- ☐ Card suspended or canceled
- ☐ Refresher training
- ☐ Informal counseling
- ☐ Resolve administrative discrepancy
- ☐ Report as external fraud
- ☐ Request vendor credit/dispute the transaction

d. **Case Review Timeframe.** Cases must be resolved within 30 calendar days of the billing cycle end date.

1) Billing officials must complete their review of assigned IOD cases within 15 calendar days of the billing cycle end date. A/OPCs may suspend the managing account if IOD cases are not reviewed within 15 days.

2) Level 4 A/OPCs must close cases within 30 calendar days of the billing cycle end date. Level 3 A/OPCs may notify the Level 4 A/OPC's chain of command if cases are not closed within the required timeframe.

3) A/OPCs may add stricter controls regarding the timeline for completing IOD cases.

e. At their discretion, A/OPCs may flag additional transactions for review within IOD. Billing officials are required to review these additional cases as part of the normal case review process and timeline.

Table 11-3: Daily Data Mining Case Review Cycle

Action	DM Case Review Cycle Milestones	Compliance Mechanism
IOD assigns cases daily for review	Throughout the billing cycle	Not applicable
Billing officials complete their review of assigned cases	<p>Billing officials should complete reviews throughout the billing cycle to promote timely resolution (e.g., transaction dispute, CH retraining). Billing officials must complete reviews within 15 calendar days of the billing cycle end date.</p> <p>Note: Any case the A/OPC refers to the BO for additional review may require action through day 30.</p>	A/OPCs may suspend managing accounts with open cases 15 days after billing cycle end date.
A/OPCs review and close assigned cases	<p>A/OPCs must complete reviews within 30 calendar days of the billing cycle end date.</p> <p>Note: Any case the OA/OPC refers to the BO for additional review may require action through day 30.</p>	OA/OPCs must suspend managing accounts with open cases 30 days after the billing cycle end date.

Parent topic: CHAPTER 11 - MANAGEMENT CONTROLS AND PROGRAM OVERSIGHT