

13-4. Army GPC PMR Process

a. The Department of the Army, through the ODASA(P), will establish, execute, and provide oversight of a tiered GPC PMR program reviewing each contracting activity every three years in order to achieve the following:

- a. Assess, analyze, and communicate the health of Army contracting to senior Army leadership.
- b. Ensure management oversight and control of contracting related issues.
- c. Ensure compliance with Federal, Defense, and Army acquisition regulations and policies.
- d. Provide best practices for the Army to enhance the procurement process.

b. Purpose and Objectives of PMRs.

- 1) Foster good stewardship of resources.
- 2) Improve processes.
- 3) Evaluate and strengthen internal controls.
- 4) Assess and reduce risk.
- 5) Ensure that agencies establish and maintain internal controls to provide reasonable assurance the goals and objectives of the purchase card program are being met, and safeguards against fraudulent, improper, and abusive purchases are adequate.
- 6) Assess program results.
- 7) Communicate results so systemic problems can be identified and addressed.
- 8) Implement Corrective Action Plans.
- 9) Improve the performance and accountability of the GPC program.

c. HCAs or SCOs will conduct GPC PMRs on contracting activities, to include subordinate contracting offices, regardless of the level, at least once every 36 months and provide the schedule of reviews no later than 31 August of the preceding fiscal year to the ODASA(P). ODASA(P) may grant, in writing, an extension to four years on a one-time basis when circumstances are justified. Additionally, the ODASA(P) may require, in writing, more frequent reviews of contracting activities as deemed necessary.

d. **Preparation for GPC PMRs.** Reviewers should notify the activity being reviewed 30 days before planned GPC PMR visits. The activity will provide the following in advance: metrics, bank reports and IOD data mining reports, completed GPC toolkit, specified statistics, copies of previous reviews/corrective action plans, procurement authority, and training materials. Additionally, the activity may request additional areas of emphasis and assistance during the GPC PMR.

e. Results of Procurement Management Reviews.

- 1) Reports of GPC PMR results will contain a risk assessment, analysis of issues, commendations,

observations, findings, and recommendations as appropriate. GPC PMR report findings must be specific and include sufficient information to enable root cause analysis. GPC PMR recommendations must be based on supported findings and be actionable.

- 2) Contracting activities at all levels will perform timely GPC PMRs. Untimely reporting erodes the effectiveness of the review.
- 3) Reviewers will submit the initial PMR report to the reviewed activity within 30 business days after the outbrief.
- 4) The GPC contracting activity reviewed will submit a Corrective Action Plan (CAP) within 30 business days of report receipt.
- 5) The responsible review official must review and approve the CAP and prepare a Final PMR report within 30 business days of CAP receipt.
- 6) The reviewed activity must complete corrective actions - if any - within the agreed timeframe, inform the GPC PMR Team Lead of corrective actions taken, and request closure of the CAP.

f. Annual Summary Health Report.

- 1) HCAs will provide to the ODASA(P), an Annual Summary Health Report for their organization to include copies of all GPC PMR reports and associated analyses of subordinate contracting offices GPC reviews no later than 31 October each year.
- 2) The ODASA(P) will provide an Annual Summary Health Report to DASA(P) that presents a holistic assessment of Army GPC contracting no later than 31 January each year.

h. GPC Review Key Areas.

- 1) Delegation of contracting authority
- 2) Training requirements for program coordinators, approving officials and cardholders
- 3) Setting of reasonable single purchase and monthly limits and blocking of MCCs
- 4) Annual reviews to evaluate the number of CHs and BOs, CHs limits and transactions
- 5) Uses of the GPC
- 6) Independent Receipt and Acceptance
- 7) Reconciling accounts and certification of transactions
- 8) Span of control for BOs and A/OPCs
- 9) Criteria for establishing accounts
- 10) Convenience checks, annual review and 1099 Reporting
- 11) Delinquency and Prompt Pay Interest
- 12) Maximizing Refunds

13) Criteria for deactivation/cancellation/termination of cards

14) Documentation/Retention (e.g., uploading transaction documentation in the bank's EAS)

Parent topic: Chapter 13 - Management Reviews