



United States Department of the Interior

BUREAU OF INDIAN AFFAIRS
Washington, D.C. 20240

JUN 12 2003

IN REPLY REFER TO:

Division of Forestry

Memorandum

To: Chief Financial Officer
Attention: Chief, Division of Acquisition and Property Management

From: **ACTING** Director, Office of Trust Responsibilities *J. L. A.*

Subject: Expanded Government Charge Card Purchase Authority During
Emergency Wildland Fire Operations

Per Section 1.4 (A) 6, of the 90 IAM, Wildland Fire Management. The Bureau of Indian Affairs (BIA), Branch of Fire Management located at the National Interagency Fire Center (NIFC) uses the Interagency Incident Business Management Handbook to conduct wildland fire business. The handbook was developed under the authority of the National Wildfire Coordinating Group (NWCG) and has been adopted for use by all five Federal agencies with wildland fire management programs. It was developed to provide guidelines to assure uniform application of interagency fire business management policies and procedures. All agencies with wildland fire management programs follow the direction set forth in the handbook except where specific agency legal mandates, policies, rules or regulations require otherwise. The handbook is reviewed and updated annually to ensure compliance with new laws, regulations and legal opinions.

The BIA, Branch of Fire Management is requesting an exemption to the BIA's charge card procedures to allow BIA personnel involved in emergency fire operations to have expanded Government charge card purchasing authority as specified in the attached BIA supplement to the Interagency Incident Business Management Handbook, Chapter 20, Acquisition, 24.1 Purchase Cards and Convenience Checks. This expanded authority is required to facilitate the logistical support of BIA fire fighters. If approved, procedures and implementation policy will be documented in a supplement to the Interagency Incident Business Management Handbook.

The attached BIA supplement describes the appropriate use of charge cards and convenience checks required to support wildland fire emergencies and will clarify Government charge card purchasing authority exemptions needed by BIA fire fighting personnel. Other Federal agencies in the wildland fire community who already allow use of the expanded authorities have found that the policies and procedures in the supplement include adequate internal controls. This office agrees that there are adequate safe guards to prevent fraud or abuse.

If you have questions on this matter, contact Rosie Morin, BIA, Branch of Fire Management Administrative Officer, at (208) 387-5696.

Bureau of Indian Affairs
Branch of Wildland Fire Management
Boise, ID

Supplement No. BIA-NIFC-01 - NWCG Interagency Incident Business Management Handbook Acquisition, Chapter 20, 24.1, Purchase Cards and Convenience Checks

Effective Date:

Expiration Date: Indefinite

Utilization of Government Charge Card and Convenience Checks for Emergency Incident Support

Purchases shall be made by the most efficient method and in accordance with Agency procedures. The resource order and request number must be included on all acquisition documents (including convenience checks and purchase card receipts). Emergency incident acquisition methods, which are different from standard acquisition procedures are described below. Government charge cards are generally the most convenient and efficient means of acquisition, for the vendor as well as for the Agency.

Purchases under the micro-purchase threshold \$2,500 may be made by non-warranted personnel using their charge card or convenience checks:

This document outlines procedures for the appropriate use of charge cards and convenience checks during emergency incidents. It includes procedures on using both the Bank of America Master Card charge card (BOA) and convenience checks. It is critical that all users subject to this directive follow these policies and procedures to assure that internal controls minimize the potential for fraud and abuse in the BIA.

Warranted Contracting Officers may use charge cards or convenience checks to place orders and/or make payments over the micro-purchase threshold when the supplies or services are under contractual instruments. These instruments include Emergency Equipment Rental Agreement contracts, basic order agreements, incident claims (non-Tort) and Blanket Purchase Agreements (BPAs). BPAs provide a convenient method to procure goods and services when there is a recurring need.

The BPA used in conjunction with the Government Charge card saves time. The Agency Purchasing Agent or Contracting Officer should establish BPAs with local vendors who are used on a recurring basis. The process works best for purchases over the micro-purchase threshold and for the following:

- Meals, beverages and lodging - This exception will be used to lodge and feed emergency firefighters (EFF) and seasonal employees serving on fire crews in emergency situations.
- Personal Gear - This exception will be used to purchase personal items such as



clothing, footwear or toiletries for fire crew/emergency personnel when items are destroyed, lost or stolen when on a wildland fire assignment. Employee claims for casuals are covered under the Military Personnel and Civilian Employees Claims Act (Section 70.01-4). Specific procedures are outlined in the Interagency Incident Business Handbook, Chapter 70, Claims, 72.4.

-Payment of medical treatment for EFF firefighters and overhead when authorized by Incident Agency Provided Medical Care (AMPC). AMPC provides initial emergency medical to individuals who are hurt or become ill while engaged in an emergency incident and in emergency situations there are transitional breakdowns and lack of coordination by the Finance Section and Incident Agency when demobilization of employees occur. As a result of this, medical costs are sent to the home unit long after the incident occurs and payment has to be made. Home agency will verify AMPC authorization and request documentation from Incident Agency to process payment by charge card.

The Regional/Agency Purchasing Agents or Contracting Officers shall ensure that those who are designated to place orders follow the procedures in FAR 13.303.5 and must review BPAs annually. BPAs with local vendors may provide goods or services and are established to shorten the procurement cycle.

Individuals assigned to incidents or agency staff who have micro-purchase authority must coordinate all purchases with the Incident Management Team (IMT) Finance Section Chief, or Procurement Unit Leader or Agency Administrator. All purchases made on an incident must be documented with a Resource Order (Example Attached) and a copy of all procurement documents (log, Resource Order and copies of receipts) must be turned into the IMT Finance Chief or Agency Administrator prior to leaving the incident.

All requests for goods and services shall be supported by a resource order. The Resource Order may be used in lieu of agency requisition forms.

Fire Template Information:

What is a fire template?

A fire template is a charge card option set to allow fire personnel, Warranted Contracting Officers, Fire Management Officers, Hotshot Crew Superintendents, Assistant Hotshot Crew Superintendents, Buying Team members, Fire Dispatchers, Crew Representatives and Crew Bosses to purchase meals, lodging, supplies and services for their crews and have all purchases centrally billed.

The Regional Office determines who may be assigned to a fire template. Once the determination to assign an individual to a fire template is made, supervisors of individuals being assigned must notify the Regional Program Coordinator of the decision to assign an individual to a fire template. This may be done as needed (e.g. at the beginning of the fire season for fire personnel, upon assignment to an incident for single resources, or at the beginning of the field season).

When assignment to a fire template is approved by the Regional Office, the APOC will notify appropriate agency personnel (e.g. Administrative Staff responsible for travel voucher processing, etc.).

There are three different fire templates. With the exception of automated teller machine (ATM) cash advances, all items purchased under any of the three fire templates will be centrally billed:

The Templates are:

1. Option Set#3033
Non-warranted Personnel
Single Purchase limit - \$2,500
2. Option Set#3050
Personnel with \$10,000 limited warrant
Single Purchase limit - \$10,000
3. Option Set #3050
Warranted Personnel with over \$10,000 Warrant
Limited by Warrant Authority

How is a template assigned?

The Regional Fire Management Officer (RFMO) can determine who needs to be assigned to a fire template. The RFMO must provide a list of employees needing fire templates to the Regional Agency Program Coordinator. This may be done as needed (e.g. at the beginning of the fire season or upon assignment to an incident).

The APOC must contact the Bank of America (BOA) at 1-800-472-1424 and request the individual be assigned to one of the fire option set templates. This change may be done in the Electronics Accounts Government Ledger System (EAGLS) and will be effective in 24 hours. If there is a need for immediate access to the higher purchase levels, the APC may contact a BOA Customer Service Representative and request an immediate change.

Are there any restrictions on use within a fire template?

Individuals with fire templates must have purchasing authority to charge travel expenses for themselves and their entire crew as well as other emergency incident related purchases to the BOA charge card. For verification of purchases a copy of their Resource Order must be on file to support the costs for the crew. When lodging and meals are paid with the BOA, crew members will be only authorized to submit a travel voucher for miscellaneous expenses, all transportation, lodging and meal expenses will be centrally billed and cannot be reimbursed.

Individuals must ensure that only authorized expenses are charged on the card

(meals, lodging, rental car, fuel, etc). Examples of unauthorized expenses include, but are not limited to, optional insurance for rental cars, hotel movie rentals, alcoholic beverages, phone calls, fines, penalties, etc,

Phone calls, both business and authorized personal calls, should be made using the Government MCI calling card for federal employees. In accordance with U.S. Department of Interior Policy dated 6/14/2000, Personal calls are determined in the best interest of the government based on work schedule, work demands, EFF employees may be allowed by authorization of the Agency Administrator and Incident Commander to provide services for official communications at base camp.

The APOC must notify the appropriate agency personnel (e.g. administrative staff responsible for travel voucher processing) of Individuals who are under a fire template and the effective date(s).

How is the charge card statement reviewed?

Receipts for all centrally billed items must be filed with BOA cardholder account statement. Individuals and Regional AOPCs are responsible for ensuring that travel-related expenses comply with BIA travel regulations and are within per diem limits. .

Personnel under a fire template changing costs from centrally billed to individually billed must file a travel voucher for meals and incidental expenses (M&IE). Traveler must submit to the Regional AOPC the following information when changing charges from centrally to Individually billed items:

- Account Number: Last 12 digits
- Transaction Posting Date
- Transaction Amount
- Merchant Name
- Reference Number (If available)
- A brief justification for the request to transfer the transaction.

Individuals, reviewing officials, or others approving travel vouchers must ensure charges and reimbursements are appropriate. For information purposes, the travel voucher must show the daily lodging charges. All personnel are responsible for ensuring that current per diem rates for destination are utilized when requesting reimbursement.

Is a travel voucher filed?

To receive reimbursement for travel, all emergency fire personnel must ensure a travel authorization is filed within three business days upon return to their duty station. All fire personnel must adhere to Regional Office procedures for filing travel vouchers. The cardholder will file a travel voucher for reimbursement of items that are not provided by the Government (i.e. if lodging and meals were not provided while en route to a fire). The

cardholder and crew members must not file a voucher if all travel expenses (meals, lodging, rental car, etc.) have been provided by the Government (centrally billed items are considered provided by the Government). Travel voucher should be filed for miscellaneous expenses.

Can the default cost structure be changed?

Supervisors/individuals must notify the Agency Administrator or Agency Program Coordinator of the cost structure to the fire account for their charge card. When necessary, the agency administrator can change the cost structure for costs incurred by a fire emergency.

What is the advantage of a fire template to the firefighter?

The Fire Management Officer, Crew Boss, Crew Superintendent, Crew Representative or any other individual on fire assignment with purchasing authority may charge travel expenses for themselves and their entire crew (permanent, temporary or Emergency Firefighter) as well as other emergency incident-related purchases to the BOA charge card. This is critical to the support of firefighters on fire assignment.

Interagency Incident Business Management Handbook, Chapter 20, 24.1 Purchase cards and convenience checks.

USING CONVENIENCE CHECKS FOR SUPPORT OF EMERGENCY INCIDENTS:

The purpose of procedures for the appropriate use of convenience checks during emergency incidents. This policy and procedure are critical to assure that a system of internal control is followed so the Bureau of Indian Affairs can minimize the potential for fraud and abuse.

Convenience checks may only be issued when the government charge card is not accepted by the vendors. The government charge card is the first choice for making purchases of commercially available goods and services within the cardholder's single purchase limit. If a vendor does not accept a charge card, a convenience check may be written for emergencies. Convenience checks are limited to \$2,500 per transaction for non-warranted personnel and up to \$25,000 per transaction for warranted Purchasing Agents or Contracting Officers. Charge card transactions are considered an electronic payment and, therefore, must comply with provisions of the Debt Collection Improvement Act (DCIA). Convenience check transactions, on the other hand, are not considered electronic so the provisions of the DCIA do not apply.

Convenience checks for emergency incident support may not be written for travel cash advances, travel expenses, salary payments, cash awards, refunds, travel-related tickets, payments to oneself,

Government Bills of Lading, commercial bills of lading exceeding \$100 or personal clothing or footwear (unless it is a commissary order request).

Check writers are responsible for complying with BIA policy regarding check issuance, check completion, responsible check use, completion of 1099s for IRS reporting, and documentation of related Budget Object Codes, as stated in the Convenience Check Program Guidelines memorandum dated 12/20/2000 and/or Regional Procedure.

PAYMENT OF EMERGENCY EQUIPMENT RENTAL AGREEMENTS (EERA)

1. The Accounts Payable Branch, Accounting Operations Division, at the National Business Center will process EERA payments for emergency incidents and small business vendors without delay so that vendors do not have to wait 30 days to receive payment. If vendor information is contained in the vendor table, it should take approximately 10 days to process payments through NBC and send a Treasury check to the vendor's mailbox. A payment processed electronically, (e.g. electronic funds transfer (EFT) to the vendor's bank) may take only 3 days. The preferred method in a large incident or if the workload in an office is such that payments cannot be processed in a timely manner, a payment team should be requested through normal dispatch channels, or a BIA procurement team.
2. Contracting officers or Agency Purchasing Agents should review preseason EERAs to determine if there is a likelihood that the equipment will be dispatched and payments will be made. If so, such EERAs should be added to the vendor table if they are not already included. During the active fire season, Contracting Officers should work closely with their local dispatch offices to ensure that vendor information is included in the vendor table prior to receiving any invoices for equipment that has been or will be called up within or outside the local area. Doing so will expedite payment to the vendor. Contracting Officer and Purchasing Agents are reminded of the requirement to ensure that vendors are registered in the Central Contractor Registry (CCR) prior to issuing an award document or entering into an charge card transaction over \$2,500.
4. If a number of EERA payments are needed for a large incident or if the workload in an office is such that payments cannot be processed in a timely manner, a payment team should be requested through normal dispatch channels. The National Park Service (NPS) has established administrative payment teams that can process vendor payments for equipment, supplies, and services (re: the National Interagency Mobilization

Guide (NFES 2092) for information on dispatch procedures of NPS Administrative Payment Teams). BIA also has Vendor Pay Administrative Payment Teams to process vendor payments, at Fort Apache Agency and Western Nevada Agency. To order the BIA, APT Team, contact the host agency to determine availability and upon confirmation of their availability name request the Team through the interagency dispatch coordination system.

Whenever EERA invoices are processed, checks and balances must be in place to ensure proper payment. This is especially critical if charge card/convenience check payments are made by procurement personnel who may not have as much experience and training in processing payments as voucher examiners and certifying officers. To process payment of such invoices, attending emergency procurement training is encouraged (e.g. equipment time recorder training, procurement unit leader training).

The following must not be paid with a charge card or convenience check:

- a. National contracts except when approved by the issuing contracting officer. Approval should be documented and filed with the payment.
- c. Personnel hired under the Pay Plan for Emergency Workers (Administratively Determined [AD] Pay Plan) must be paid separately and not included with equipment payments.