# INDIAN AFFAIRS MANUAL

Part 27 Chapter 12 Financial Management Charge Card Reallocations

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- 1.1 Purpose. This policy establishes the requirements for reallocating charge card transactions for the following charge card types: purchase, travel, fleet, student activity, corporate, and fire cards.
- 1.2 Scope. This policy applies to all Indian Affairs (IA) headquarters, field and program staff under the authority of the Assistant Secretary Indian Affairs (AS-IA), including the Bureau of Indian Affairs (BIA) and the Bureau of Indian Education (BIE).
- 1.3 Policy. It is the policy of IA to comply with Federal regulations and policy, and direction from the Department of the Interior (DOI) and the Office of Management and Budget (OMB) to ensure that adequate internal controls and reviews are established and implemented. IA has implemented these procedures to ensure proper internal controls in compliance with DOI guidance and OMB Circular A-123, Appendix B.

### It is IA's policy to:

- Establish a process with strict internal controls to ensure that all payments are timely and accurate, and that all charges are appropriate;
- Closely monitor delinquency reports from charge card vendors;
- Contact appropriate personnel (including Agency/Organization Program Coordinator (A/OPC), Approving Officials or other accountable/billing officials) to ensure that delinquent payments are addressed and corrective actions are taken to prevent further occurrence; and
- Incorporate all controls, practices and procedures related to centrally billed account delinquencies into the agency's charge card management plan, consistent with the required elements of an agency's charge card management plan.

#### 1.4 Authorities.

#### A. Statutes and Regulations.

- 1) 48 CFR Chapter 1, Federal Acquisition Regulation (FAR)
- 2) P. L. 112-194 Government Charge Card Abuse Prevention Act of 2012

#### B. Guidance.

- 1) OMB Circular No. A-123, Management's Responsibility for Internal Control
- DOI-Acquisition, Assistance, and Asset Policy (AAAP)-0027, DOI Integrated Charge Card Program Policy

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- Financial Business Management System (FBMS) Segregation of Duties (SoD)
   Policy can be found in the Financial Management Memorandum 2011-005 (Vol. VI.A)
- 4) IA Charge Card Manual and other guidance can be found on the Charge Card Support webpage here:

  <a href="https://iiamabqzucmw02p.ia.doi.net:16200/inside.indianaffairs/Org/AS-IA/OCFO/AP/CCS/index.htm">https://iiamabqzucmw02p.ia.doi.net:16200/inside.indianaffairs/Org/AS-IA/OCFO/AP/CCS/index.htm</a>
- 5) General Services Administration Acquisition Regulation (GSAR)
- 6) Principles of Federal Appropriations Law, Vol. I, Chapter 5: Bona Fide Needs Rule

### 1.5 Responsibilities.

- A. <u>Deputy Assistant Secretary Indian Affairs (Management) (DASM)</u> is responsible for oversight of all budget financial management functions.
- **B.** Chief Financial Officer (CFO) is responsible for ensuring financial management is consistent with requirements of the CFO Act of 1990, OMB guidance, Department of the Treasury, GAO, and Federal Accounting Standards Advisory Board; and provides senior leadership, policy, and oversight of all budget financial management functions.
- C. <u>A/OPC</u> is responsible for maintaining a Master Accounting Code (MAC) report assigned to each card holder for posted charge card transactions.
- **D.** <u>Finance Office</u> is responsible for completing corrections within 15 days of receipt of the statement, but no more than 45 days after the billing date of the statement and reaching out to the submitting office for clarification
- E. <u>Charge Card Holders</u> are responsible to review the charges for corrections and identify any transactions that require accounting changes.
- **F.** Accounting Officer is responsible for reviewing charge card transactions on a regular basis and making adjustments ensuring they are posted to the proper accounting string.

### 1.6 General Overview.

Charge card transactions are posted against a Master Accounting Code (MAC) that is maintained by the Regional Charge Card A/OPC. When a new charge card account is created in JP Morgan's Payment Net system, and interfaced to FBMS, the account assignment used for the MAC is a default account assignment established based on the

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account type and the region associated with the account. MACs are lines of accounting/accounting codes assigned to each card holder.

Regional A/OPCs must update the MAC from the default account assignment to an account assignment that should be used for a majority of charge card transactions. If any transactions post prior to the MAC being updated, or if there is not any budget availability in the updated MAC, the transactions will post directly to the regional default account.

Regions are encouraged to review these charges regularly and make adjustments to the proper accounting string. All charges not reallocated out of the central account will be moved to a regional account 30 days after defaulting.

#### 1.7 Procedures.

#### A. Review.

Upon receipt of the charge card statement, cardholders must review the statement to verify the charges. If the statement requires corrections, cardholders will identify any invalid charges or any items requiring accounting changes and make necessary notations on the statement.

The cardholder must sign and submit the statement, along with the required accounting changes, to his/her supervisor for review and approval. The changes requested should include:

- Total amount to be reallocated:
- Valid fund;
- Fund Center:
- Functional Area:
- Work Breakdown Structure (WBS) (if applicable);
- Work Order (WO) (if applicable, e.g. Fleet);
- Purchase Order (if applicable); and
- Travel Authorization (if applicable).

### B. Corrections.

The Servicing Finance Office must complete corrections within 15 days of receipt of the statement, but no more than 45 days after the billing date of the statement. If the Servicing Finance Office is unable to complete the changes due to incorrect accounting data, the Servicing Finance Office must reach out to the submitting office for clarification. The submitting office must provide corrected accounting information

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within two (2) working days of request. The Servicing Finance Office will notify responsible officials immediately after the corrections are successful and completed.

If the account is Fleet related, and change in accounting is necessary, the cardholder will notify the regional property staff so they can update the WO or create a new WO to be used for the reallocation.

In circumstances where the reallocation is in a different region or budget responsibility area, confirmation to reallocate to the different accounting string must be obtained from the region/office prior to reallocation. For example, an email confirmation providing the correct line of accounting must be obtained from the cardholder/or their budget officer. This step will ensure that the accounting string provided has sufficient funds available to receive the charges and prevent the transaction from further default.

When the MAC has an invalid accounting string, the charge will go through a defaulting scheme. The current configuration attempts to post the charges to regional default accounts. In some circumstances, the charges may default to a central office account. As a result, the charges must be moved to the accounting codes assigned to the respective regional office.

## C. Reporting.

Central Office prepares a monthly report listing all charge accounts that require a MAC update (these charge accounts would default otherwise). The report lists all transactions hitting a default account that require a reallocation and also provides an aging analysis displaying how long the transaction has been posted to the default account. This report is sent to the Regional A/OPCs for immediate action.

Approval

Acting Deputy Assistant Secretary – Indian Affairs (Management)