



OFFICE OF THE UNDER SECRETARY OF DEFENSE

3000 DEFENSE PENTAGON
WASHINGTON, DC 20301-3000

ACQUISITION
AND SUSTAINMENT

MEMORANDUM FOR COMMANDER, UNITED STATES CYBER
COMMAND (ATTN: ACQUISITION EXECUTIVE)
COMMANDER, UNITED STATES SPECIAL OPERATIONS
COMMAND (ATTN: ACQUISITION EXECUTIVE)
COMMANDER, UNITED STATES TRANSPORTATION
COMMAND (ATTN: ACQUISITION EXECUTIVE)
DEPUTY ASSISTANT SECRETARY OF THE ARMY
(PROCUREMENT)
DEPUTY ASSISTANT SECRETARY OF THE NAVY
(PROCUREMENT)
DEPUTY ASSISTANT SECRETARY OF THE AIR FORCE
(CONTRACTING)
DEFENSE AGENCY AND DOD FIELD ACTIVITY DIRECTORS

SUBJECT: Governmentwide Commercial Purchase Card Guidance Related to Recording 889
Designation and Emergency-type Operation Values (GPC 2022-02)

References: (1) Recording Implementation of Section 889(a)(1)(B), Prohibition on Contracting
with Entities Using Certain Telecommunications and Video Surveillance
Services or Equipment, when using the Governmentwide Commercial Purchase
Card, dated September 9, 2020
(2) Governmentwide Commercial Purchase Card Guidance Related to Recording
Transactions involving National Interest Action Codes and Emergency
Acquisition Authorities (GPC 2021-1), dated December 9, 2020
(3) Department of Defense SmartPay® 3 Government-wide Commercial Purchase
Card Guidance for the Coronavirus Disease 2019 (COVID-19), dated April 2,
2020

In order to improve data integrity and promote policy compliance, this memorandum mandates use of a new Access Online capability that validates Cardholders (CHs) have made a selection from a drop-down picklist of valid values for specified purchase log fields before they can approve their monthly billing statement. Until now, this system validation was only available on Transaction and Order management fields that required text entry. This capability will be deployed in two phases. Phase 1, which will deploy on July 1, 2022, will enable mandatory drop-down picklists in Transaction Management for Components that use non-editable eOrders. Phase 2, which will deploy in the first quarter of Fiscal Year 2023 (FY23), will enable mandatory drop-down picklists in Order Management for Components that use editable eOrders or that have CHs who manually enter order form data. The Attachment 1 Release Plan includes a list of Components affected in each phase.

This memo also expands the 889 Designation list of allowable entries established in Reference 1. The full list of allowable values is at Attachment 2, paragraph b.

Component Program Managers impacted by Phase 1 are directed to update Component-level guidance issued pursuant to References 1, 2, and 3 to require CHs to use the Transaction Management Custom Fields to document 889 Designations and Emergency-Type Operation Values (formerly referred to as Contingency Operations), instead of the Transaction Management Comments fields, when non-editable eOrders are used. Details regarding the changes implemented in Transaction Management are available in Attachment 2. Because system validation that a value has been selected does not occur if the CH has not clicked on the Transaction Management Custom Tab, it is essential that Component-level guidance reiterate that Approving/Billing Officials (A/BOs) are required to validate that CHs are correctly using these and all other purchase log fields, and attaching all required transaction supporting documents during the monthly account reconciliation process. Component-level guidance shall also reiterate that Oversight Agency/Organization Program Coordinators (OA/OPCs) and A/OPCs are required to periodically review compliance using the Transaction Detail Report and take corrective action when non-compliance is identified.

Attachment 3 provides additional guidance related to selection of each valid “889 Designation” and “Emergency-Type Operation” value, and the related “ADD’L Code or Event Info” free form text field. Future changes to valid values will be provided on the Defense Pricing and Contracting / Purchase Cards – Systems webpage at <https://www.acq.osd.mil/asda/dpc/ce/pc/systems.html>.

DPC will issue a policy memo when Phase 2 deploys. Necessary policy changes will be incorporated into the next issuance of the DoD Charge Card Guidebook, or its successor policy. My point of contact is Ms. Pamela Talbott, pamela.m.talbott.civ@mail.mil, 804-609-4304.

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J. Lisa Romney
Director, Contracting eBusiness,
Defense Pricing and Contracting

Attachments:
As stated

Attachment 1
Release Plan - Access Online Valid Drop-Down Picklist Capabilities

	Phase 1	Phase 2
Planned Deployment Date	7/1/2022	1 st half of FY23
Access Online Capability Impacted	Transaction Management	Order Management
Description of Change	Mandatory drop-down picklists of allowable 889 Designation and ETO entries will be enabled for use by Components that send non-editable e-orders to Access Online.	Mandatory drop-down picklists of allowable 889 Designation and ETO entries will be enabled for Components that send editable eOrders to Access Online, or that have CHs who manually enter order form data.
Components Impacted	Army DAF DON DECA DHA DISA DLA DMA DODEA DODIG USUHS WHS	Army DON DCMA DECA DFAS DHA DISA DLA DMA DMEA DTRA MDA

NOTE: DPC is currently evaluating use of mandatory drop-down value picklists for 27 other Order Management Custom Fields at the order and line item level.

Attachment 2
Changes Implemented in Transaction Management

NOTE: The following guidance applies only if your organization records 889 Designations and ETO Values in Access Online **Transaction** Management. It does **not** apply if your organization records 889 Designations and ETO Values in Access Online **Order** Management.

The following changes have been implemented in the U.S. Bank’s Electronic Access System, Access Online, Transaction Management to facilitate CH compliance with mandatory purchase log policy requirements and improve data integrity:

- a. The “Contingency Operations” and “889 Designation” fields have been moved from the Transaction Management **Comments** Tab to the Transaction Management **Custom** Tab. These two fields have been renamed “DO NOT USE-See Custom Tab” on the Comments Tab. They will, however, be available in reports to view historical transaction entries.
- b. The following valid value list has been added to the “889 Designation” field on the Custom Tab. During the account reconciliation process, CHs *shall navigate to the Transaction Management Custom Tab, select a valid value, and click the save button*. System validation that a value has been selected will not occur if the CH does not click on this Tab.
 - i. 889 Merchant Rep
 - ii. 889 ODNI
 - iii. 889 Agency
 - iv. 889 Exception
 - v. 889 Payment
 - vi. 889 Non-Compliant
 - vii. Fraudulent (external) Transactions
 - viii. Disputed Transactions
 - ix. Fees (e.g. Convenience Check)
 - x. Refunds & Trans Credits/Discounts
 - xi. Memo For Record approved by A/OPC
- c. The field label “Contingency Operations” has been changed to “Emergency-Type Operation” to ensure consistency with DoD GPC policy and system updates.
- d. The following valid value list has been added to the “Emergency-Type Operation” field on the Custom Tab. During the account reconciliation process, **CHs shall navigate to the Transaction Management Custom Tab, select a valid value, and click the save button**. System validation that a value has been selected will not occur if the CH does not click on this Tab.

Attachment 2
Changes Implemented in Transaction Management

- i. Not in support of ETO
 - ii. Applicable code not in this list
 - *See item e. below*
 - iii. O14S-Operations in Iraq and Syria
 - iv. O15F-Operation Freedom's Sentinel
 - v. P20C-COVID-19 2020
 - vi. H20L-Hurricane Laura 2020
 - vii. O21R-Operation Allies Refuge Welcome
 - viii. H21I-Hurricane Ida 2021
 - ix. O22U-Ukraine Mission Support
- e. If "Applicable code not in this list" is selected from the Emergency-Type Operation valid value list above, a secondary field titled "ADD"L Code or Event Info" is available and should be filled in with the appropriate entry (e.g., NIA Code and short description that is not yet added to the drop-down list; code mandated by Component or local policy and short description to associate a transaction with a particular event).
- f. Enforcement of the mandatory/required aspect of the "Emergency-Type Operation" and "889 Designation" fields *only occurs* once the user navigates to Transaction Management Custom Fields and clicks the save button.**
- g. As part of the monthly account reconciliation process, A/BOs are required to validate that CHs are using these and all other purchase log fields correctly, and attaching all required transaction supporting documents.
- h. OA/OPCs and A/OPCs are required to periodically review "889 Designation" and "Emergency-Type Operation" compliance through the use of the Transaction Detail Report and are expected to take corrective action when non-compliance is identified. Reviewing the Transaction Detail Report or a Flex Data Report frequently to validate CH usage of the new Custom Fields is essential to verify compliance.
- i. In the event additional information is required after the Account Billing Statement has been approved/certified, CHs or A/BOs may use the comments field at the bottom of the Access Online Order Management Order Record to manually enter one of the allowable purchase log entries and provide any other necessary information.

Attachment 3
Selection of Valid Values

The table below provides details for the values available in the “889 Designation” and “Emergency-Type Operation” fields and about the “ADD’L Code or Event Info” free form text field.

Transaction Custom Field #	Value	When to use
#1 889 Designation	889 Merchant Rep	Merchant provided the required 889 representation at Federal Acquisition Regulation (FAR) 52.204-24(d)(2) or equivalent with a “does not” response; the CH relied upon the representation to make the purchase.
	889 ODNI	Merchant provided the required 889 representation at FAR 52.204-24(d)(2) or equivalent with a “does” response, but it has been determined the required supplies/services are covered by an ODNI waiver granted in accordance with FAR 4.2104 (e.g., the transaction is for supplies/services included in a Product Service Code (PSC)-based waiver); the CH relied upon the waiver to make the purchase.
	889 Agency	Merchant has provided the required 889 representation at FAR 52.204- 24(d)(2) with a “does” response, but it has been determined the required supplies/services are covered by an Executive Agency waiver that was approved in accordance with FAR 4.2104; the CH relied upon the Executive Agency waiver to make the purchase.
	889 Exception	Merchant has provided the required 889 representation at FAR 52.204- 24(d)(2) with a “does” response, but in conjunction with the supporting contracting office, a FAR 52.204-25(c) exception applies; the CH relied upon the exception to make the purchase. Written approval from the supporting contracting office shall be included with the transaction supporting data.
	889 Payment	CH was not required to obtain the required 889 representation at FAR 52.204-24(d)(2) because the GPC was used only as a method of payment. Examples include payments: against contracts; to fulfill intra/inter-governmental requirements; against approved SF-182 commercial training requests.
	889 Non-Compliant	CH purchased supplies/services without obtaining the required 889 representation at FAR 52.204-24(d)(2) that were not covered by an ODNI waiver, an Executive Agency waiver, or a FAR authorized exception. The purchase was not in compliance with GPC policy.

Attachment 2
Changes Implemented in Transaction Management

Transaction Custom Field #	Value	When to use
#1 889 Designation (cont.)	Fraudulent (external) Transactions	CH should select when transaction is believed to be a fraudulent purchase.
	Disputed Transactions	CH should select when disputing the transaction.
	Fees (e.g., Convenience Check)	CH should select when transaction is for fees.
	Refunds & Trans Credits/Discounts	CH should select when transaction is for Refunds & Transaction Credits and Discounts.
	Memo for Record approved by A/OPC	For other A/OPC approved scenarios, CHs should prepare a short Memorandum for Record (MFR) documenting the situation and include it with the transaction supporting data loaded into Access Online or as otherwise directed in Component GPC record retention instructions.
#2 Emergency Type Operation- CAUTION: This list is representative only. Additional values may have been added/deleted since this document was issued. For the most up to date information go to: Federal Procurement Data System - Next Generation (fpds.gov)	Not in support of ETO	CH should select when transaction is not in support of an ETO.
	Applicable code not in this list	CH should select when the transaction is in support of an ETO but the assigned National Interest Action (NIA) code is not yet in this ETO drop-down list or when Component or local policy mandates entry of a specific code in the purchase log to associate a transaction with a particular event. When this value is selected, the CH must enter applicable code in the “ADD’L Code or Event Info” field.
	O14S-Operations in Iraq and Syria	CH should select when transaction is in support of NIA Code O14S – Operations in Iraq and Syria.
	O15F-Operation Freedom’s Sentinel	CH should select when transaction is in support of NIA Code O15F – Operation Freedom’s Sentinel (OFS) 2015.
	P20C-COVID-19 2020	CH should select when transaction is in support of NIA Code P20C – COVID-19 2020.
	H20L-Hurricane Laura 2020	CH should select when transaction is in support of NIA Code H20L – Hurricane Laura 2020.
	O21R-Operation Allies Refuge Welcome	CH should select when transaction is in support of NIA Code O21R – Operations Allies Refuge/Welcome.
	H21I-Hurricane Ida 2021	CH should select when transaction is in support of NIA Code H21I – Hurricane Ida 2021.
	O22U-Ukraine Mission Support	CH should select when transaction is in support of NIA Code O22U – Ukraine Mission Support.

Attachment 2
Changes Implemented in Transaction Management

Transaction Custom Field #	Value	When to use
#3 ADD'L Code or Event Info	Free form text	CH must complete when "Applicable code not in list" is selected from the Emergency-Type Operation list. Entry must include either the applicable NIA that is not yet available in the ETO list along with a short description, or the code specified in Component or local policy along with a short description.