\*\*ID\_\_AFARS\_Appendix-EE\_4-2\_\_ID\*\*

### 4-2. Surveillance Reporting and Surveillance Reviews

a. The Level 4 A/OPC must conduct a review of 100% of BO accounts annually to include a minimum representative sample size of 25% of transactions for each BO account. The A/OPC should utilize PCOLS Data Mining/Risk Assessment (DM/RA) reviews, transactional reports from the Bank’s EAS (or other electronic oversight process), DoD Checklist and Certification Template (appendix D), and the Formal Reporting Requirements Template (Appendix G) to perform the review.

b. Reviews may be conducted in person, remotely, or electronically depending on the size, complexity, and past review history of the BO account. Reviews should focus on transaction activity and overall adherence to the purchase card program requirements, as well as provide a response to previous findings and recommendations and resulting corrective actions taken. Results of the review should be documented and briefed to the BO and the BO's supervisor detailing findings, discrepancies, issues, and/or identifiable trends.

c. In conjunction with reviewing all BO accounts annually, the Level 4 A/OPC is responsible for drafting a semi-annual surveillance report and providing it to the Level 3 A/OPC (due April 21st and October 21st). The report should address all aspects of the activity’s GPC program, including BO/CH account/transaction reviews; appointment and account issuance/maintenance; GPC usage requirements; GPC documentation, processing, and financial requirements; convenience check writer requirements; and training.

d.In reporting BO/CH account and transaction data, the review should include the following: at least 25% of transactions based on a representative sample of data, inclusion of high risk transactions as flagged in Access Online and PCOLS, and transactions from every BO and CH account. The semi-annual surveillance report must thoroughly analyze and summarize all items addressed in the DoD Checklist and Certification Template (Appendix D) and the Formal Reporting Requirement Template (Appendix G). The report should be all-inclusive as to provide a clear, precise representation of the agency GPC Program and its daily operations.

e. Level 3 A/OPCs must conduct semi-annual reviews of all Level 4 Programs within their oversight and must provide a formal semi-annual report (due May 1 and November 1) to the Army Level 2 A/OPC. The report should provide the results of the surveillance programs for their prospective organization, should summarize repetitive or systemic weaknesses by activity, and should address all aspects of a surveillance plan. The surveillance report should provide a detailed summary of the reports provided by his/her respective Level 4 A/OPCs. The report must be drafted and presented to the Level 2 A/OPC using the template found at Appendix H which summarizes all aspects of the GPC Program, consistent with the DoD Checklist and Certification. All area of the template should be fully analyzed, discussed, and supported with metrics, concrete examples and evidence that a surveillance plan was implemented and surveillance conducted throughout the reporting period.

f. The Level 2 A/OPC will provide an Army-wide GPC Semi-annual surveillance report describing the Army GPC Program. The report will identify trends, corrective actions, and dates for implementing changes throughout the GPC community to support identified program trends, strengths and weaknesses. The Level 2 A/OPC may interview Level 3 and/or Level 4 A/OPCs to gain further insight into GPC trends across the Army GPC program and may perform a separate random sample review of GPC transaction to determine whether or not identified trends are substantiated.

a. Review reports must be maintained on file for six years and three months. Repeat findings from the previous fiscal year review report may result in suspension of your account.

b. Convenience check and FDC accounts shall be reviewed quarterly by a disinterested party and not the BO of the convenience check account or A/OPC.

c. Reports of surveillance reviews must provide information to each management level, which identifies repetitive problems and systemic weaknesses at the individual and organizational levels.

d. A/OPCs, BOs, and CHs must use PCOLS to assist and monitor the use of the GPC

e. The Army shall use PCOLS as an electronic tool for managing its GPC program.See section 4.4 for a description of PCOLS. PCOLS enables A/OPCs to conduct oversight and surveillance of an organization’s GPC program utilizing PCOLS reporting capabilities. By clicking on the “PCOLS Reporting” section upon logging into the PCOLS website, the A/OPC is able to run various reports based upon her/her role in PCOLS. These reports assist the A/OPC in identifying GPC program trends and strengths and weakness and should be monitored and used in conjunction with conducting GPC surveillance. The Army GPC Program Office will utilize PCOLS reporting capabilities to decipher the overall health of the GPC Program and to validate finding of each agency’s semi-annual surveillance and Office of Management and Budget (OMB) report findings.