

**UNITED STATES TRANSPORTATION COMMAND  
(USTRANSCOM)  
POLICY DIRECTIVE 90-9  
19 April 2000**

**COMMAND POLICY**

**USTRANSCOM INTERNATIONAL MERCHANT PURCHASE  
AUTHORIZATION CARD (IMPAC) PROGRAM**

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**REFERENCE:** United States Air Force (USAF) Internal Procedures for Using the International Merchant Purchase Authorization Card (IMPAC), 28 Apr 97.

**A. PURPOSE:** This Policy Directive (PD) supplements USAF IMPAC procedures and establishes USTRANSCOM's policy concerning the IMPAC program.

**B. APPLICABILITY:** This instruction is applicable to all personnel assigned or attached to USTRANSCOM, Scott AFB, Illinois. This instruction also applies to any USTRANSCOM unit that is detached from Scott AFB and uses a Scott AFB IMPAC card. Violation of this instruction may subject individuals to adverse administrative or disciplinary actions under the Uniform Code of Military Justice or the applicable civilian personnel regulations. This directive provides for the collection and maintenance of information protected by the Privacy Act of 1974. The authority to collect and maintain the information is USTRANSCOM Instruction 37-11 and 5 U.S.C. section 552a.

**C. RESPONSIBILITIES:**

1. All USTRANSCOM cardholders and approving officials (AO) will follow USAF IMPAC procedures as specified in the USAF Internal Procedures for Using IMPAC, 28 Apr 97.
2. The Program Analysis and Financial Management Directorate (TCJ8) has the responsibility to oversee USTRANSCOM's IMPAC program. TCJ8 will:
  - 2.1. Supervise the issuance of cards and the maintenance of accounts.
  - 2.2. Monitor IMPAC training.
  - 2.3. Answer questions and concerns, and help resolve IMPAC purchase approval conflicts.
  - 2.4. Have the authority to suspend IMPAC privileges to cardholders and AOs.
  - 2.5. Coordinate on all requests for waivers to 375 Contracting Squadron (CONS) for purchases over \$2,500.

2.6. Coordinate on all ratification actions involving purchases made with an IMPAC card.

2.7. Conduct periodic audits of all master accounts.

2.8. Approve any deviations from this directive.

3. The Acquisition Division (TCJ4-AQ) Command Acquisition Officer, will:

3.1. Coordinate on all requests for waivers to 375 CONS for purchases over \$2,500 and ensure any individual cardholder granted a waiver is adequately trained on acquisition issues (Competition in Contracting Act, Davis-Bacon Act, etc.) likely to impact the purchase.

3.2. Review all ratification actions involving purchases made with an IMPAC card.

#### **D. POLICIES AND PROCEDURES:**

1. Directors and Direct Reporting Element (DRE) Chiefs will appoint only qualified personnel as AOs and cardholders. Absent a waiver from TCJ8, AOs must be of an equivalent or higher grade than their cardholders. Military-Civilian equivalent grades can be found in DOD 7000.14R, Volume 11A, Chapter 6, Appendix B (Financial Management Regulation [FMR]).

1.1. Prior to receiving a card, AOs and cardholders will attend IMPAC training given by 375 CONS.

1.2. Directorate/DRE resource advisors/managers and supervisors of cardholders will attend IMPAC orientation training.

1.3. Cardholders cannot be their own AO.

1.4. AOs cannot be an AO for their immediate supervisor.

2. Contractors and their employees supporting USTRANSCOM are prohibited from being appointed as AOs or cardholders.

3. Directorates will not use the IMPAC for purchasing construction or renovation projects unless:

3.1. AF procedures permit as specified in the USAF Internal Procedures for Using the IMPAC.

3.2. They have complied with USTRANSCOM PD 32-1, USTRANSCOM Facilities - Buildings 1900 and 1961 and USTRANSCOM Instruction 32-2, USTRANSCOM Facilities Standards.

4. The following actions are prohibited:

4.1. Splitting requirements to avoid the card limitations.

4.2. Using the card for capital or Research, Development, Testing and Evaluation (RDT&E) expenditures.

4.3. Obtaining cash advances.

4.4. Using the card for other than official Government purposes.

5. Semi-annually, or as directed by TCJ8, AOs will review their cardholders accounts by using the surveillance guide checklist (attached) to ensure cardholders are effectively performing their duties. TCJ8 will randomly review the results of the surveillance guides.

6. Other authorities.

6.1. The IMPAC can be used to purchase specific categories of items provided the requirements of the following are met:

6.1.1. Cellular telephones, regulated by USTRANSCOM PD 33-10, Cellular Telephone Management.

6.1.2. ADPE, software/hardware regulated by USTRANSCOMI 33-16, Management of USTRANSCOM Computer Assets.

6.1.3. Printing, Duplicating, and Copying regulated by USTRANSCOMI 33-8, Reprographics Management Program - Printing, Duplicating, and Copying.

6.1.4. Military and Civilian Training regulated by USTRANSCOMI 36-13, Military and Civilian Training and Professional Development Program.

6.2. The IMPAC cannot be used to purchase equipment that must be ordered by base supply.

**D. EFFECTIVE DATE AND IMPLEMENTATION:** This directive is effective immediately.

APPROVED BY

S I G N E D

DANIEL G. BROWN  
Lieutenant General, U.S. Army  
Deputy Commander in Chief

OPR: TCJ8-B

Attachment:  
Surveillance Guide

## IMPAC SURVEILLANCE GUIDE

**PURPOSE:** To document compliance with procedures associated with the International Merchant Purchase Authorization Card (IMPAC)

| ISSUE   | Yes | No | N/A |
|---|-----|----|-----|
| 1. Has the cardholder limited purchases to transactions under his/her single purchase limit?  |     |    |     |
| 2. Does the total value of the cardholder's purchases for any single month exceed the monthly cardholder limit established by the approving official?   |     |    |     |
| 3. Has anyone other than the cardholder made purchases with the IMPAC or IMPAC account number?  |     |    |     |
| 4. Are items purchased over-the-counter, immediately available IAW para 5.3.5.2.1?  |     |    |     |
| 5. Are items purchased over the telephone delivered during the 30-day billing cycle?  |     |    |     |
| 6. Are all items purchased during one telephone transaction, not confirmed by a written order, delivered on a single delivery?  |     |    |     |
| 7. Does the cardholder maintain a log of all purchases?   |     |    |     |
| 8. Are purchases for items such as: photographic; potential hazardous materials; and communication and computer equipment and software, coordinated with the specified controlling agency?  |     |    |     |
| 9. Are purchases of nonexpendable equipment/supplies approved in advance by the organization's equipment custodian?   |     |    |     |
| 10. Are items purchased that are identified in the IMPAC procedures as "unauthorized"?  |     |    |     |
| 11. Are funds available to pay for each item purchased?   |     |    |     |
| 12. Are all purchases made on an F.O.B. destination basis only?   |     |    |     |
| 13. Is the cardholder distributing purchases equitably among qualified suppliers?   |     |    |     |
| 14. Does the cardholder document the record regarding competition and reasonableness of price when necessary?   |     |    |     |
| 15. Does the cardholder "split requirements" to stay within the required dollar parameters? [FAR 13.602(C)]   |     |    |     |
| 16. If the cardholder has purchased equipment items, are those items authorized under the organization's table of allowances?   |     |    |     |
| 17. Has all accountable equipment purchased been properly recorded on the organization's accountable records?   |     |    |     |
| 18. For each item purchased with the IMPAC, has the cardholder recorded the name of the person requesting the item?   |     |    |     |
| 19. Does the cardholder obtain a customer copy of the charge slip for all over-the-counter purchases?   |     |    |     |
| 20. When making purchases by telephone, does the cardholder document the transaction on a log, and attach any shipping documents associated with the order?   |     |    |     |
| 21. Does the cardholder reconcile information on the monthly statement of account (fill in a description for each purchase, enter the appropriate funding document number, attach all supporting documentation, sign the statement, and then forward it to the approving official)? |     |    |     |

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|---|--|--|--|
| 22. If no transaction documentation was available to send to the approving official with the statement, did the cardholder attach an explanation including an item description, date of purchase, merchant's name, and why there was no supporting documentation? |  |  |  |
| 23. Does the cardholder complete the reconciliation process and forward the statement of account to the approving official within three work days of receipt?   |  |  |  |
| 24. If the cardholder cannot review the statement at the time it is received, does he/she make the records available to the approving official for review and certification of the statement?   |  |  |  |
| 25. In cases as described in surveillance No. 24, does the approving official annotate the statement as to why the cardholder's signature is not available and does the approving official review the statement with the cardholder upon his/her return?          |  |  |  |
| 26. Does the approving official review each of the cardholder's monthly statement(s), sign the monthly summary statement, and forward the monthly summary statement to the paying office within five work days after receipt from RMBCS?                          |  |  |  |
| 27. Is the cardholder purchasing recycled products?   |  |  |  |
| 28. Does the approving official retain supporting documentation on purchases by attaching it to his/her copy of the cardholder's monthly statement?   |  |  |  |
| 29. Is the cardholder handling disputes in accordance with the established procedures?  |  |  |  |
| 30. Does the cardholder or approving official notify the Disputes Office on those purchases or credits that do not appear on the appropriate monthly statement?   |  |  |  |
| 31. For purchase or repair of office equipment, has the cardholder coordinated with a contract repair representative to ensure the equipment was not covered under an existing preventive maintenance agreement or warranty?                                      |  |  |  |
| 32. When IMPAC was used for construction services up to \$2,000, did the cardholder have an approved AF Form 332 on file?   |  |  |  |
| 33. Was the cardholder offered a rebate from the manufacturer/retailer? Did the cardholder fill out the paperwork for the rebate to the manufacturer/retailer?  |  |  |  |
| 34. If the manufacturer/retailer sent a check with a rebate to the cardholder, did the cardholder forward the check to the Finance Office?  |  |  |  |
| 35. Does the cardholder use the IMPAC to purchase items that should be obtained through supply or individual issue channels?  |  |  |  |
| 36. Does the cardholder use the IMPAC to purchase items (e.g., business cards) from other than approved (e.g. Lighthouse for the Blind) or mandatory (e.g. Prison Industries) sources?  |  |  |  |

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| 37. If the cardholder has been delegated authority to purchase items costing in excess of micropurchase thresholds, has the cardholder complied with applicable acquisition laws and the Federal Acquisition Regulation as supplemented by DoD and AF? |  |  |  |
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