Abstract

This guide describes how to use the Data Mining system, which provides for the management and review of Government Purchase Card (GPC) transactions.

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1.0 INTRODUCTION

1.1 Purpose

The Data Mining (DM) application is part of a suite of electronic applications known collectively as the Purchase Card On-line System (PCOLS). PCOLS consists of the following applications:

- Enterprise Monitoring and Management of Accounts (EMMA)
- Authorization, Issuance, and Maintenance (AIM)
- PCOLS Reporting
- Sign-on and Referral System (SRS) (PCOLS Single Sign-on)
- DM
- Risk Assessment Dashboard (RAD)

Note that RAD is the replacement for the Risk Assessment Application. RAD has a standalone user manual.

The purpose of the DM Application User Manual is to provide a concise, accessible instructional guide for authorized users to learn the functionality of the DM application.

1.2 Data Mining Application Overview

The DM application provides a single user interface for Department of Defense (DoD) users to access DoD purchase card transaction data. DM programmatically reviews 100% of the purchase card transactions. Each applicable transaction is assigned a score by the Risk Predictive Model (RPM), which is an integral part of the DM application. At Risk Transactions are transactions that are flagged by the RPM based on either a high model score or trigger from the Rules Segment. These At Risk Transactions are subsequently referred for review. Also, a statistically based sample of random transactions is referred for review. The Case Manager, which is part of the DM application, provides the interface that allows assigned Approving/Billing Officials (A/BOs) to review and disposition (close) At Risk Transactions. Through the use of the Case Manager Interview Process, the A/BO demonstrates that due diligence is exercised in the review of the referred transactions. Additionally, the interview process records information related to the interview process to support the validity of the purchase card transaction.

The DM application uses industry leading analytic techniques, DoD specific business rules, account profiles associated with the transaction, and unique adaptive techniques to flag transactions as At Risk Transactions. These are the transactions that require a review. Figure 1.2-1 depicts how DM integrates within the PCOLS environments, and Figure 1.2-2 diagrams the DoD customization of the RPM.
DM functionality is accomplished through two main components within the DM Application – RPM and Case Management. Each component is described below.
• RPM – This component scores all purchase card transactions coming into DM. RPM flags cases for review. Flagging is based on the following transaction identification methods.
  i. Neural networks – This is the primary method used by DM to detect abnormal behavior and predict high risk transactions.
  ii. Profiles – This method works with the neural network models to encode and make use of the unique behavior of each individual Cardholder and managing account.
  iii. DoD Rules – This method relies on a set of business rules that specifically were created based on Government audit findings.
  iv. Random Transactions – This method selects transactions from a statistically based random sampling for review by the A/BO.

• Case Management – This component provides the interface to the user that allows for the review and documentation of At Risk Transactions.
  i. Case Manager – Provides the user interface to the case. The cases are categorized as New, Under A/BO Review, and Closed. The Case Manager provides drill-down capabilities for each case category.
  ii. Manual Case Creation for Review – Allows users to self-initiate a case for review by the A/BO within the Case Management system (see Section 5.6).
  iii. Independent Review – After the referred case has been reviewed by the A/BO, the transaction is available for Independent Review by authorized DoD Personnel (see Section 5.4).
  iv. Find Transactions – This function provides complete access to all Cardholder transaction data on a rolling 18-month basis. This function allows users to easily search all transactions through detailed filters (see Section 5.5).

Within the DM Application there is an escalation process. This escalation process is based on timely case disposition (closing). The escalation process, triggered when a case has not been completed in a timely manner, is accomplished through email notifications. The email notification functionality is governed by the DM hierarchy (see Section 2).

1.3 Data Updates

DLA Transaction Services maintains the Global Exchange (GEX) for electronic data interchange. The GEX is used to transmit banks files (US Bank and Citibank) directly to Data Mining. DM receives daily transactional data from the banks and a monthly bank file.

The Defense Manpower Data Center (DMDC) sends to DM thru the GEX a hierarchy file that contains all active PCOLS users. This file is the basis for determining role-based access to the DM application. Currently, the hierarchy file is transmitted and processed twice a day.

The DM Case Manager provides the user interface to purchase card transactions by billing cycle or by all available billing cycles. A cycle for a Cardholder Account closes on the 19th of each month. For example, the August billing cycle begins on 20 July and runs through 19 August.
1.4 System Requirements

The following components are required on a workstation in order to use DM.

- Personal Computer/Smart Card (PC/SC) Reader and Driver
- Appropriate middleware in conformance to National Institute of Standards & Technology (NIST) InterAgency Report 6887
- Internet Browser (Microsoft Internet Explorer 11 or higher)

1.5 Security

1.5.1 Application Security

Users are required to log in to the DM Application using their Common Access Card (CAC). This log in is accomplished through the PCOLS Sign-on and Referral System (SRS). All communication between the user's web browser and the DM application is encrypted. Each user session within the DM application will expire if the user is inactive for 30 minutes. The user is required to log in again after a session has expired.

1.5.2 Data Security

All screens limit the amount of data users can view. Users can only view the data related to the users that fall under their responsibility. This view is based on their assigned organization and hierarchical level. The higher users are in the hierarchy, the more levels of data available to them for access. Users have access to data at their level and can drill-down to see lower-level details.

Some users have multiple assignments (roles) in the hierarchy. If a user has multiple roles, then the user can switch between roles within the DM Application (see Section 4). A report can only be generated for a single organizational branch in the Cardholder hierarchy. Users who are assigned to multiple organizations in the Cardholder hierarchy can only access one organization at a time.

All DM Application content is designated For Official Use Only (FOUO).

1.6 Technical Support

The PCOLS Help Desk provides Tier One support with escalation capability to Tiers Two and Three.

Users can contact the PCOLS Help Desk at the following phone numbers or by email at dlacontactcenter@dla.mil.

- US (CONUS) – Commercial (toll-free): 1-800-376-7783
- OCONUS – DSN: 661-7307
- Direct dial: 269-961-7307

User must provide the help desk with their Organization identification (ID), which can be found on the AIM Profile page. This ID is assigned according to the user’s Organization in EMMA and cannot be changed.

The PCOLS logon is:

https://pki.dmde.osd.mil/appj/pcols-web/

PCOLS user manuals and training material can be downloaded from the Defense Acquisition
University (DAU) website:
https://acc.dau.mil/pcols

2.0 DM USERS AND HIERARCHY

Access to the DM Application varies by the user's hierarchy level. User titles designate a specific role for the user that is described in detail in Section 5.2.

The Hierarchy role titles are as follows (except for the Navy):
- Level 1 – DoD Purchase Card Policy Office (PCPO)
- Level 2 – Acquisition Executive Agent (Level 2)
- Level 3 – Head Contracting Activity (HCA) Agent (Level 3)
- Level 4 – Agency/Organization Program Coordinator (A/OPC) and A/OPC Supervisor
- Level 5 – Approving/Billing Official (A/BO), A/BO Alternate, and A/BO Supervisor

The Navy has an additional level in the user hierarchy:
- Level 1 – DoD PCPO
- Level 2 – Acquisition Executive Agent (Level 2)
- Level 3 – HCA Agent (Level 3)
- Level 4 - High-Level A/OPC
- Level 5 – A/OPC and A/OPC Supervisor
- Level 6 – A/BO, A/BO Alternate, and A/BO Supervisor

If a user is assigned to multiple roles, then DM displays these roles upon initial logon. The user must select a single role when first logging on (see Section 4.1). The user can switch roles by clicking the "Select Role" link at the top right corner of every page. This action takes the user back to the “User Role Selection” screen, which is the screen where the user selects a role.

3.0 LOG-ON FUNCTIONS

3.1 Logging In

To log into DM directly, the user will:

1. Insert the user’s CAC into the card reader.
2. Open Internet Explorer and enter the following Web address: https://pki.dmdc.osd.mil/appj/pcols-web/
3. Select the user’s Identity Certificate.
4. Enter the Personal Identification Number (PIN) for the CAC and click OK. The “Log On” screen is displayed.
5. Click CAC Log on.
6. Click Log on in the “Data Mining” section. See Figure 3.1-1.

To log into DM from a Notification Email, the user will:

1. Insert the user’s CAC into the card reader.
2. Click the DM link in the notification email that was received.
3. Select the user’s Identity Certificate.
4. Enter the PIN for the CAC and click OK. The “Log On” screen is displayed.
5. Click CAC Log on.
6. Click **Log on** in the “Data Mining” section. See Figure 3.1-1.

![Figure 3.1-1 PCOLS Log-on Page](image)

7. Select appropriate role. See Section 4.1.

8. If the error in Figure 3.1-2 is displayed, the user verifies that the link contained the full URL. Some email clients may break the link in the middle of the case number. Cases can be found manually by case number, see Section 5.5.

![Figure 3.1-2 Invalid Case Number Error](image)
4.0 NAVIGATION

4.1 General Navigation

The DM Application allows users to easily navigate through all its components. In the top right corner of every page is a "Help" link that takes users to the PCOLS website where users can download the DM User Manual from the "Available For Download" section. Also, throughout the DM Application are blue question mark “?” buttons next to links and questions. Clicking on these buttons provides contextual help and guidance based on law, regulation, and/or policies and procedures. Additionally, located on the top right of every page is a "Contact" link that displays phone and email contact support information (described in Section 1.6), a "Select Role" link that takes the user to the “User Role Selection” screen, and a "Logoff" link that signs the user out of the application. See the example screen in Figure 4.1-1.

![User Role Selection Screen – Single Role](image)

**Figure 4.1-1 User Role Selection Screen – Single Role**

Users should use the "Go Back" link in the right corner to return to the previous page viewed. **Note: Users should not use the browser's back button as it may cause problems with the information displayed.** At any time, the user can return to the main Case Statistics page by clicking the first level code on the page or the "Case Management" tab when on the Case Statistics Results page.

When users first arrive in the DM Application, the user role needs to be selected by clicking the "Select" button (Figure 4.1-1) next to the desired role. Users may have one role or many roles. Users that are assigned to multiple roles will have more than one option available to select a specific role within a specific hierarchy. Within a user session, the user can change roles by clicking on the "Select Role" link located in the upper right corner of every screen. This link takes the user to the “User Role Selection” screen. Figure 4.1-1 shows what is displayed for a single A/BO role. Figure 4.1-2 shows what is displayed for a user that has both an A/BO Supervisor role and an A/OPC role.
Important Note: The data presented within the figures in this manual include simulated data and do not necessarily reflect actual referred cases or the risk assessment of any Service/Organization or hierarchical level.

4.2 DM Navigation

This section is intended to help users navigate through the DM Application to access and view the Case Management screens, close cases, and search transactions within the application.

1. Upon initial logon, a user role must be selected. The “User Role Selection” screen is the first screen that is displayed when logging on. Select the appropriate role for the session. Note that no other navigation is allowed until a role is selected. A user must have a role to proceed.

2. There are two tabs within the main "Data Mining" high level tab. The two tabs are:
   a. "Case Management"
   b. "Find Transactions"

   The Case Management tab is described in detail in Section 5.3.

3. All users can click on any of the columns showing flagged transactions in their area of responsibility: new cases are "NEW", pending cases are "UNDER A/BO REVIEW," legacy cases are “LEGACY,” and closed cases are "CLOSED." Clicking on a link under the "Level" column takes the user to the next level Case Statistics or Account Details screen. Clicking on a number from the other columns (New, Under A/BO Review, Legacy, or Closed) navigates to the Case Statistics Results screen.

4. Once at the Account Details screen, the user can click on the "View" or "Create" button at the end of each row to navigate to the Case Details screen.

5. From the Case Details screen, the user can click on the Account Number link to go back to the Account Details screen.

6. The user can return to the Case Statistics screen by clicking the first level code on the screen (i.e., the breadcrumb) or the "Case Management" tab when on the Case Statistics Results screen.

7. Once users enter information into the Find Transactions filter and click the "Find" button, the transactions that match the criteria entered are displayed. The Find Transaction Tab is described in detail in Section 5.5.
8. Navigating from the "Find Transactions" tab follows the same general navigation steps as the "Case Management" tab.
9. Once again, clicking on the "View" or "Create" buttons in the View column navigates the user to the Case Details screen.
10. The user can return to the Case Statistics screen by clicking the "Case Management" tab.

5.0 DM APPLICATION

5.1 Introduction

The DM Application provides DoD Purchase Card Program users At Risk Transaction case review capabilities along with all transaction view capabilities. The application programatically reviews 100% of the DoD purchase card transactions and assigns a score to the transactions. At Risk Transactions are subsequently referred to the A/BO for review. Also, a statistically based sample of random transactions is referred for review. Through the use of the Case Manager Interview Process, the A/BO demonstrates that due diligence is exercised in the review of the referred transactions. Additionally, the interview process records information related to the review of the transaction to support the validity of the review.

5.2 DM User Hierarchy

- Level 1 – DoD PCPO user has read only access to review the transactions for the entire DoD Purchase Card Program. This level can perform an Independent Review on any dispositioned (closed) case.
- Level 2 – Acquisition Executive Agent has read only access to review the transactions at the Service/Organization level. This level can perform an Independent Review on any dispositioned (closed) case in their Service/Organization hierarchy.
- Level 3 – HCA Agent has read only access to review the transactions of all A/BOs under the Level 4 A/OPCs in their hierarchy. This level can perform an Independent Review on any dispositioned (closed) case in their hierarchy.
- Level 4 – A/OPC has read only access to review the transactions of all A/BOs in their hierarchy. This level can perform an Independent Review on any dispositioned (closed) case in their hierarchy. The A/OPC Supervisor has the same level of access and view of data as each of the A/OPCs under their purview.
- Level 5 – A/BO uses the Case Management system to review transactions of Cardholders under their area of responsibility that have been referred by the DM Application. The A/BO documents their analysis of the transaction by answering a series of questions based on the transaction type. The A/BO Alternate’s view and use of the application is no different than that of the A/BO for which they are the alternate. The A/BO Supervisor has the same level of access and view of data as each of the A/BOs under their purview. While the Primary A/BO is tasked with completing a case review, any Alternate A/BO or the A/BO Supervisor is permitted to complete a case review.

The Navy user’s role and their access within the DM Application is an exception to the above hierarchy, which all other Service/Organizations utilize. The Navy is the only Service with a High-Level A/OPC role.

- Level 4 – High-Level A/OPC has read only access to review the transactions of all A/BOs under the Level 5 A/OPCs in their hierarchy. This level can perform an
independent review on any dispositioned (closed) case in their hierarchy. This level is followed by Level 5 – A/OPC and Level 6 – A/BO.

5.3 Case Management

A/BOs are the first line users of the DM Application. The A/BO documents the review of all the cases that have been referred in the Case Management system. Also, all hierarchy levels are able to self-initiate cases within Case Management.

5.3.1 A/BO Case Management

The referred cases are assigned for examination and displayed on the Case Statistics page. The A/OPC receives an email for high risk transactions, accesses the Case Management system, and documents his/her Independent Review once the information is completed by the A/BO in the Case Management system. There is an escalation process if transactions are not reviewed in a timely manner. This escalation affects the risk assessment rating within the RA Dashboard. If the cases are not reviewed timely, the case can be escalated as high as the PCPO. Information displayed under the Case Management tab can be filtered by cycle using the Cycle drop-down menu in the right corner of the screen (Figure 5.3.1-1 and Figure 5.3.2-1).

Figure 5.3.1-1 Case Management Tab – Case Statistics Page

1. The first column "Level" in Figure 5.3.1-1 shows all the managing accounts that are under the purview of the A/BO.
2. The second column "NEW" shows the number of flagged cases to be reviewed.
3. The third column "UNDER A/BO REVIEW" shows the number of cases under review (pending cases).
4. The fourth column “LEGACY” shows the number of cases that have been converted to legacy cases (i.e., existing new cases that were converted to legacy once users migrated into PCOLS).
5. The fifth column "CLOSED" shows the number of dispositioned cases that have been reviewed and closed by the A/BO.

5.3.2 Purchase Card Account Details

From the Case Statistics screen (Figure 5.3.1-1), the user navigates to the Account Details screen
(Figure 5.3.2-1) by clicking on the link in the Level column. This navigation method allows the user to navigate down through the hierarchy to the card number level. Alternatively, clicking on the number of cases in each status column (New, Under A/BO Review, Legacy, or Closed) takes the user to the Case Statistics Results screen. This navigation method displays only those cases that were specifically selected from the Case Statistics Results screen (i.e., New, Under A/BO Review, Legacy, or Closed).

The Account Details screen provides transaction history and Cardholder account information (Figure 5.3.2-1).

**Figure 5.3.2-1 Account Details Screen**

The Account Details Screen (Figure 5.3.2-1) is described in detail below. The screen is annotated with numbers and each number refers to a corresponding description below.

1. At the top of the Account Details Screen is the link to drill up to higher levels. In this case, the TBR Levels 1 through Level 5 and the Managing Account are displayed (displayed masked).
2. The Cardholder Account Number is displayed (display masked).
3. To the right side margin of this screen is the Cycle drop down. The user selects ALL, which returns a rolling 18 months of cycle data, or they select a specific cycle (e.g., Jan 2015).
4. Below the Cardholder Account Number there are two tabs. The first tab is the "Transaction History" tab, which is the default, and the "Account Information" tab. In this view, the "Account Information" tab is greyed out. If selected, this
“Account Information” screen provides information on an individual’s account. All available information on the account is displayed.

5. Within the "Transaction History" tab is "Filter Transactions". Selecting the minimize button next to "Filter Transactions" hides the search parameters. The minimize button is the [-] on the left side of “Filter Transactions”. Also, the “Filter Transactions” can be expanded when the button allows ([+]).

6. Filtering can be done by selecting one of the four Case Statuses or All, which includes all four of the Case Statuses. To filter on a specific Case Status, select one of the four Case Status options from the drop-down menu. The four Case Status are (in order of selection):
   - Legacy
   - Closed
   - Open
   - New Case

7. Filtering can be done by making one of the following Case Disposition drop-down selections:
   - All
   - Contract Payment
   - Under A/BO Review
   - Valid Transaction
   - Administrative Discrepancy
   - Misuse
   - Suspected Fraud
   - Abuse
   - Lost
   - Stolen

Only one disposition can be searched on at a time.

8. Filtering can be done by Independent Review. If the Independent Review checkbox is selected, only those transactions with a Pending or Complete Independent Reviews are returned.

9. Additional filtering can be accomplished using the filtering criteria for the Transaction Date(s) (date range of when the transaction occurred), Merchant Name, MCC, Amount ($) (dollar amount range of the transaction), and Case Number.

10. Once the filter criteria has been determined and entered on the screen, the user selects the "Filter" button to execute the search. The "Clear" button is used to clear all of the entries on the form.

11. The results are displayed for all transactions meeting the entered selection criteria. Note: The resulting data can be sorted by clicking on the column heading (Transaction Date, Status, Disposition, Independent Review, Type, Amount, or Merchant). Cases are highlighted in blue across the entire row if have been flagged At Risk by the model (i.e., New Cases and Legacy Cases). Also, cases remain highlighted in blue once there has been an action taken on that case. Other
bank transactions are not highlighted. The user may select a transaction from the "View" column by clicking on either the "View" button or the "Create" button. Clicking either view or create causes the Case Details screen (Figure 5.3.3-1) to display. The "Create" button is used to self-initiate a case. By clicking the create button, the case becomes a New Case and the case now is required to be dispositioned. This situation does cause the transaction to go from white across the row to blue. Users from all hierarchy levels can self-initiate (i.e., "Create") cases for review by the A/BO. For more details and guidance on self-initiating a case, see Section 5.6 Self-Initiating Cases.

5.3.3 Case Details

From the Account Details page, clicking on the "View" button takes the user to the Case Details page. Here, the user can view detailed information associated with a transaction as well as any information entered during an A/BO's review of the transaction. As part of the review of the transaction, the A/BO answers a series of questions. These questions are described below in the Case Review Section.

From the Case Details screen, transactions can be viewed in two formats. These two formats are Summary and All Grouped. Summary is the default view and is the primary view used for case disposition. Figure 5.3.3-1 shows a case that is in Summary View and is Under A/BO Review and was not self-initiated (Self Initiated: field is blank).

5.3.4 Summary View

The first section displayed on the Case Details screen in Summary view (Figure 5.3.3-1) is the "Transaction Information" section. This section contains the Account Number, Managing
Account Number, Transaction Date, Transaction Type, Transaction Amount, Self-Initiated Indicator (Yes for a self-initiated case, or blank otherwise), Case Created Date (when the case was first flagged by the model or self-initiated), Case Opened Date (when the A/BO first opened the case), Last Updated Date, Merchant Name, MCC, and Last Action. The Account Number and Manager Account (both masked) allow drill up to their associated level.

The Transaction Types that are seen within DM are described below:

* B = Bank Initiated Posting – Typically Bank Rebate posted to account
* D = Foreign Draft or Return/Refund/Credit
* K = Convenience Check within Data Mining
* O = Other (most purchases; no differentiation)
* U = Disputed or Declined Transaction

If the case is “New”, there is no user information available to be displayed. If the case is “Under A/BO Review” or “Closed”, then any and all information is displayed.

The "Action History" section shows the information on the action taken on the case. This summary information of the action taken on the case includes:

- Date
- Type
- Disposition
- Recommended Action
- A/OPC Notified
- Referred to DoD Organization
- Comments
- User (the person that completed the action)

Under the Comments column, the user selects "View" to see comments made by the specific user. Comments are not required to be entered, but are highly recommended to be entered to aid in the documentation of the case.

The user's first action on the Case Details screen is to describe the product or service acquired. This description is a required field. There is no editing or validation of this description and there is a maximum of 500 characters for the field. Generally, it is expected that this field be populated with a description similar to level three data from the banks. A/BO users should be as specific as possible.

The question regarding convenience check purchase is automatically populated with the data provided by the banks for the transaction. The user does not need to reply to this question. If the transaction is a Type = K (Convenience Check), then the radio button for the question is automatically populated with “Yes.” If not, then the radio button is populated with “No.”

Next, the user must answer whether the card was compromised, lost, or stolen. The user selects the “Yes” or “No” radio button. If the answer is "Yes," the application immediately greys out the rest of the questions. The A/BO user does not answer any further questions and goes to the "Case Disposition" section (Figure 5.3.6-1). Then the user must select “Lost” or “Stolen” from the Case Disposition drop-down menu. The application only allows a disposition of lost or stolen once the lost/stolen question is answered yes.
If the card was not lost, or stolen, the user must answer all the questions under the "Case Review" section (Figure 5.3.4-1 or Figure 5.3.5-1 depending on whether or not a convenience check was used for the transaction). For further guidance on how to answer these questions, click on the circular blue question mark "?” buttons next to each question.

The user enters whether or not the transaction was a payment on a contract or delivery order. The user selects the “Yes” or “No” radio button. If the answer is “Yes,” then the user should enter the contract number in the free form text field to the right of the contract payment question.

The additional questions that follow in the "Case Review" section differ based on the transaction. These questions include eight common questions. For convenience checks there are and four additional questions that are specific to convenience checks.

These questions can be answered as "Yes or "No" by selecting the radio buttons. When a question does not pertain to the transaction being reviewed, there is an option for N/A. Every question must have an answer. Note that a yes or no response may trigger additional questions in a drop-down menu that is displayed to the right of the question. For example, answering "Yes" to "Was there adequate source documentation?" will trigger a list from which the user selects specific documents provided. Multiple selections may be made by holding down the control key (CTRL on the keyboard).

![Figure 5.3.4-1 Case Details – Case Review Section](image)

### 5.3.5 Case Review Section

Based on whether or not a convenience check was used for the transaction, the application selects those questions that the user must answer. These questions are listed in the sections below. Note that answers to these questions affect the applicable choices that are available in the "Case Disposition" section for the Case Disposition drop-down menu.
For purchases other than convenience checks, the user must answer the following nine questions (Figure 5.3.4-1):

1. "Was the item/service formally disputed with the bank?" – The banks that issue the Government credit cards have formal dispute and resolution procedures for transactions that a Cardholder questions. The user must select "Yes" or "No" and may add additional information and details in the "Remarks" field. If "Yes" is selected, all the remaining questions are grayed out. Additional guidance can be found by clicking on the blue "?" button at the end of the row. Note that additional discussion regarding the disposition of a Dispute can be found in Appendix C C-10 Disposition of a Dispute.

2. "Did the transaction amount exceed the micro purchase limit?" – The micro purchase threshold was established in the Federal Acquisition Regulation (FAR) and set by Congress as the maximum amount that can be charged on a credit card for a single transaction for supplies or services. The user must select "Yes" or "No" and may add additional information and details in the "Remarks" field. If "Yes" is selected, a drop-down menu appears and the user must make a selection from the following options:
   - DAPS Order
   - Task or Delivery Order (BPA on an existing contract)
   - Training (allowed to $25,000)
   - Other (Specify)

   If this transaction represents a contract payment and does not fall under the available options, select “Other” and provide details in the comments field. For the acquisition of services subject to the Service Contract Act the threshold is $2,500. Additional guidance can be found by clicking on the blue "?" button at the end of the row.

3. "Was this a split purchase?" – In response to this question, the user must select "Yes" or "No" and may add additional information and details in the "Remarks" field. A purchase is considered a split purchase when a Cardholder intentionally divides the purchase into units less than the micro purchase limit in order to circumvent the single transaction maximum. No Government Purchase Cardholder may fragment/split purchases that exceed the limit or threshold, as means to use the purchase card. Additional guidance can be found by clicking on the blue "?" button at the end of the row.

4. "Did the item/service exceed minimum needs?" – The user must select "Yes" or "No" and may add additional information and details in the "Remarks" field. A good or service purchased should aim to meet the minimum needs of the desired use and not exceed other similar or like goods or services. It is the responsibility of the Cardholder to ensure purchases are proper, legal, and reasonable and would not qualify as misuse and abusive, fraudulent and improper purchases. Additional guidance can be found by clicking on the blue "?" button at the end of the row.

5. "Was the item/service for personal use?" – The user must select "Yes" or "No" and may add additional information and details in the "Remarks" field. If "Yes" is
selected, a drop-down menu appears and the user must make a selection from the following options:

- Accidental Use: Restitution Made
- Accidental Use: No Restitution Made
- Intentional: Restitution Made
- Intentional: No Restitution Made
- Other (Specify)

Personal use means the item/service was not purchased exclusively for Government activities. Use of a Government charge card for other than official Government purposes is characterized as misuse. Additional guidance can be found by clicking on the blue "?" button at the end of the row.

6. "Was the item a prohibited item?" – The user must select "Yes" or "No" and may add additional information and details in the "Remarks" field. If "Yes" is selected, a drop-down menu appears and the user must make a selection from the following options:

- Written Waiver in accordance with FAR was obtained.
- No waiver was obtained.

Prohibited items are specified in the FAR as items that would never be used or needed as part of typical Government activity. Additional guidance can be found by clicking on the blue "?" button at the end of the row.

7. "Was this item subject to mandatory sourcing?" – The user must select "Yes," "No," or "N/A" and may add additional information and details in the "Remarks" field. If "Yes" is selected, a drop-down menu appears and the user must make a selection from the following options:

- Mandatory Source Used
- Mandatory Source Not Used – Item not available in required time frame
- Mandatory Source Not Used – Other
- Mandatory Source Not Used – Written Waiver Obtained
- Mandatory Source Not Used – No Written Waiver Obtained

Mandatory sourcing requires the Federal Government to purchase certain specific products if they can meet the required needs of the Government at a competitive rate.

8. "Was Green Procurement considered, where applicable?" – Green procurement is the purchase of environmentally preferable products and services that reduce resource consumption and waste generation. The user must select "Yes" or "No" and may add additional information and details in the "Remarks" field. Additional guidance can be found by clicking on the blue "?" button at the end of the row.

9. "Was there adequate source documentation?" – The user must select "Yes" or "No". If "Yes" is selected a drop-down menu appears and the user may choose from the following six options. The user selects all of the choices that are applicable. The six choices are as follows:
- "Evidence of requester's requirements document (e.g., email or written request)" – A requirements document outlines the transactions purpose and what need it is expected to meet.
- "Detailed Transaction Receipt/Vendor Invoice" – A receipt/vendor invoice shows the exact purchase amount of the transaction. These documents should include evidence of independent verification and details of the transaction on an invoice or receipt.
- "Detailed Packing Slip" – A packing slip is a document that accompanies items shipped through the mail and outlines the content of the package and purchase details.
- "Proof of Delivery of Goods/Services" – Proof of delivery establishes that the recipient has received the specified contents sent by the sender.
- "Detailed Cardholder Purchase Log" – A Cardholder Purchase Log is a record of purchases with associated transaction details. The DoD Charge Card Guidebook identifies as a mandatory management control the maintenance of a purchase log including a description, the merchant, the date purchased, the name of the recipient of the item, and the total amount.
- "Evidence of Property Book Officer Notification" – The property book officer manages the records for all leased, loaned and borrowed equipment under their responsibility.

Of these six documentation types, “Detailed Transaction Receipt/Vendor Invoice” and “Detailed Cardholder Purchase Log” are required.

To select more than one choice from the drop-down menu, the user must hold down the control key while clicking on each selection.

If a convenience check was used for the purchase, the user must answer the following 12 questions (Figure 5.3.5-1):
Figure 5.3.5-1 Case Details – Case Review Section: Convenience Check Used

1. "Was there evidence that every attempt was made to acquire the goods/services from a merchant that accepts the GPC?" – Convenience checks and foreign drafts provide a purchasing alternative to normal GPC transactions and formal contracting. The use of convenience checks are, however, only to be used when the use of the purchase card is not possible. The user must select "Yes" or "No" and may add additional information and details in the "Remarks" field.

2. "Did the transaction amount exceed the micro purchase limit?" – The micro purchase threshold was established in the FAR and set by Congress as the maximum amount that can be charged on a credit card for a single transaction for supplies or services. The user must select "Yes" or "No" and may add additional information and details in the "Remarks" field. If "Yes" is selected, a drop-down menu appears and the user must make a selection from the following options:
   - DAPS Order,
   - Task or Delivery Order (BPA on an existing contract),
   - Training (allowed to $25,000), or
   - Other (Specify).

If this transaction represents a contract payment and does not fall under the available options, the user selects “Other” and provides details in the comments field. For the acquisition of services subject to the Service Contract Act the threshold is $2,500. Additional guidance can be found by clicking on the blue "?" button at the end of the row.
3. "Did the convenience check exceed the check limit of $3,000 per the DoD Financial Management Regulation?" – The total dollar value of convenience check purchases should not be greater than the specified limit. The user must select "Yes" or "No" and may add additional information and details in the "Remarks" field. Additional guidance can be found by clicking on the blue "?” button at the end of the row.

Please note that effective October 2015, the Micro Purchase Threshold was raised to $3,500. The DM application has not been updated to reflect this change. The recommended response to this question is to check “Yes” and reflect this discrepancy in the comments/notes. Also, have the A/OPC perform an Independent Review to acknowledge the discrepancy.

4. "Was this a split purchase?" – In response to this question, the user must select "Yes" or "No" and may add additional information and details in the "Remarks" field. A purchase is considered a split purchase when a Cardholder intentionally divides the purchase into units less than the micro purchase limit in order to circumvent the single transaction maximum. No Government Purchase Cardholder may fragment/split purchases that exceed the limit or threshold, as means to use the purchase card. Additional guidance can be found by clicking on the blue "?” button at the end of the row.

5. "Was the convenience check used to make a payment on a contract?" – A contract is a written agreement on behalf of the Government with an agreed upon delivery and payment for goods or services. The user must select "Yes" or "No" and may add additional information and details in the "Remarks" field. Additional guidance can be found by clicking on the blue "?” button at the end of the row.

6. "Was the convenience check made payable to a Government employee?" – A Government employee is an individual engaged in work on behalf of the Government. The user must confirm if the check is written out to such an individual. The user must select "Yes" or "No" and may add additional information and details in the "Remarks" field. Additional guidance can be found by clicking on the blue "?” button at the end of the row.

7. "Did the item/service exceed minimum needs?" – The user must select "Yes" or "No" and may add additional information and details in the "Remarks" field. A good or service purchased should aim to meet the minimum needs of the desired use and not exceed other similar or like goods or services. It is the responsibility of the Cardholder to ensure purchases are proper, legal, and reasonable and would not qualify as misuse and abusive, fraudulent and improper purchases. Additional guidance can be found by clicking on the blue "?” button at the end of the row.

8. "Was the item/service for personal use?" – The user must select "Yes" or "No" and may add additional information and details in the "Remarks" field. If "Yes" is selected, a drop-down menu appears and the user must make a selection from the following options:

   Accidental Use: Restitution Made,
   Accidental Use: No Restitution Made,
Intentional: Restitution Made,  
Intentional: No Restitution Made,  
Other (Specify).  

Personal use means the item/service was not purchased exclusively for  
Government activities. Use of a Government charge card for other than official  
Government purposes is characterized as misuse. Additional guidance can be  
found by clicking on the blue "?” button at the end of the row.  

9. "Was the item a prohibited item?" – The user must select "Yes" or "No" and may  
add additional information and details in the "Remarks" field. If "Yes" is selected,  
a drop-down menu appears and the user must make a selection from the following  
options:  

Written Waiver in accordance with FAR was obtained.  
No waiver was obtained.  

Prohibited items are specified in the FAR as items that would never be used or  
needed as part of typical Government activity. Additional guidance can be found  
by clicking on the blue "?” button at the end of the row.  

10. "Was this item subject to mandatory sourcing?" – The user must select "Yes",  
"No", or "N/A" and may add additional information and details in the "Remarks"  
field. If "Yes" is selected, a drop-down menu appears and the user must make a  
selection from the following options:  

Mandatory Source Used,  
Mandatory Source Not Used - Item not available in required time frame,  
Mandatory Source Not Used - Other,  
Mandatory Source Not Used - Written Waiver Obtained,  
Mandatory Source Not Used - No Written Waiver Obtained.  

Mandatory sourcing requires the Federal Government to purchase certain specific  
products if they can meet the required needs of the Government at a competitive  
rate.  

11. "Was Green Procurement considered, where applicable?" – Green procurement is  
the purchase of environmentally preferable products and services that reduce  
resource consumption and waste generation. The user must select "Yes" or "No"  
and may add additional information and details in the "Remarks" field. Additional  
guidance can be found by clicking on the blue "?” button at the end of the row.  

12. "Was there adequate source documentation?" – The user must select "Yes" or  
"No". If "Yes" is selected a drop-down menu appears and the user may choose  
from the following six options. The user selects all of the choices that are  
applicable. The six choices are as follows:  

- "Evidence of requester's requirements document (e.g., email or written  
request)" – A requirements document outlines the transactions purpose  
and what need it is expected to meet.  
- "Detailed Transaction Receipt/Vendor Invoice" – A receipt/vendor invoice
shows the exact purchase amount of the transaction. These documents should include evidence of independent verification and details of the transaction on an invoice or receipt.

- "Detailed Packing Slip" – A packing slip is a document that accompanies items shipped through the mail and outlines the content of the package and purchase details.
- "Proof of Delivery of Goods/Services" – Proof of delivery establishes that the recipient has received the specified contents sent by the sender.
- "Detailed Cardholder Purchase Log" – A Cardholder Purchase Log is a record of purchases with associated transaction details. The DoD Charge Card Guidebook identifies as a mandatory management control the maintenance of a purchase log including a description, the merchant, the date purchased, the name of the recipient of the item, and the total amount.
- "Evidence of Property Book Officer Notification" – The property book officer manages the records for all leased, loaned and borrowed equipment under their responsibility.

Of these six documentation types, “Detailed Transaction Receipt/Vendor Invoice” and “Detailed Cardholder Purchase Log” are required.

To select more than one choice from the drop-down menu, the user must hold down the control key while clicking on each of the selections.

### 5.3.6 Case Disposition Section

Once the "Case Review" section is filled out, the user completes the "Case Disposition" section (Figure 5.3.6-1).

![Case Disposition Section](image)

**Figure 5.3.6-1 Case Details – Case Disposition Section**

To complete the case disposition, the user must select from the status choices that reflect their decision on how to disposition the case. The available status choices (dispositions) are as follows (See Figure 5.3.6-2 below):

1. **Under A/BO Review** – This case disposition indicates that the A/BO is gathering information for his/her review and that review has not been completed. When this choice is selected an additional drop-down menu is displayed with the option to select: Pending Documentation or Waiting Merchant Verification. Note that it is recommended that a case be put “Under A/BO Review” if there is any delay in completing the closing of the case. This action causes the new case escalation process to stop. The pending case escalation process will, however, start. Also, the triggering of the Risk Assessment control time period continues (i.e., placing a
case under review will not stop the time frame counter (16 business days) for the
A/BO Response Rate Control).

b. Contract Payment – This case disposition is applicable to a contract payment.

c. Valid Transaction – This case disposition reflects that in the A/BO’s judgment the transaction being examined is a legitimate transaction.

d. Administrative Discrepancy - This case disposition indicates that any anomalies regarding the transaction are clerical in nature. When this choice is selected an additional drop-down menu is displayed with the option to select a recommended disciplinary action:

- Counseling
- Refresher Training
- Admonishment
- Reprimand
- NonJudicial Punishment (military only)
- Court Martial (military only)
- Administrative Separation
- Suspension
- Removal

e. Misuse – This case disposition indicates that the purchase card was used for other than official Government purposes. When this choice is selected an additional drop-down menu is displayed with the option to select a recommended disciplinary action:

- Counseling
- Refresher Training
- Admonishment
- Reprimand
- Non Judicial Punishment (military only)
- Court Martial (military only)
- Administrative Separation
- Suspension
- Removal

Note: Although A/BO users can select that the A/OPC has been notified, the system does not generate the notification. Instead, the A/BO must do this separately.

f. Suspected Fraud – This case disposition reflects that in the A/BO’s judgment that the use of the purchase card was used to acquire goods and/or services and that use was unauthorized and intended for personal use. When this choice is selected an additional drop-down menu is displayed with the option to select a recommended disciplinary action:

- Counseling
- Refresher Training
- Admonishment
Reprimand
Non Judicial Punishment (military only)
Court Martial (military only)
Administrative Separation
Suspension
Removal

In the case of suspected fraud, the A/OPC should be notified by the A/BO and the checkbox under the recommended disciplinary action drop-down should be checked.

**Note:** Although A/BO users can select that the A/OPC has been notified, the system does not generate the notification. Instead, the A/BO must do this separately. Also, note that the transaction should be referred to the appropriate DoD organization and the associated checkbox should be checked when that action has been accomplished.

g. Abuse – This case disposition reflects the judgment by the A/BO that the purchases of authorized goods or services at terms (e.g., price, quantity) are excessive, for a questionable Government need, or both. When this choice is selected an additional drop-down menu is displayed with the option to select a recommended disciplinary action:

   Counseling
   Refresher Training
   Admonishment
   Reprimand
   Non Judicial Punishment (military only)
   Court Martial (military only)
   Administrative Separation
   Suspension
   Removal

**Note:** Although A/BO users can select that the A/OPC has been notified, the system does not generate the notification. Instead, the A/BO must perform this action separately.

h. Lost – This case disposition reflects that the purchase card was lost or misplaced and is no longer in the possession of the Cardholder.

i. Stolen – This case disposition reflects that the purchase card was stolen from the Cardholder and the information has been compromised. This category includes when the card information alone has been compromised (i.e., the card itself may not have been physically stolen, but the account information was compromised).
As mentioned above, if the case is being dispositioned as Suspected Fraud, the user is required to check two additional check boxes. See Figure 5.3.6-3 below. The two check boxes are “A/OPC was properly notified” and “The transaction was referred to appropriate DoD Organizations.

Additional information may be entered into the Notes field including any dates or additional relevant information. While the Notes field does not require an entry, it is recommended that users enter Notes to assist in the future review of the transaction.

Select the "Save" button to save the information. Once the “Save” button has been clicked, the Action History is updated. Selecting the "Cancel" button removes any changes made and returns the user to the “Account Details” screen within the "Case Management" tab.

5.3.7 All Grouped View

The “All Grouped” screen (Figure 5.3.7-1) displays Transaction Information, Managing Account Details, Hierarchy Details, Cardholder Account Details, A/BO Details, Cardholder Details, Case Details, and MCC Group. Account detail categories vary by hierarchy level and data received from the banks.

The user may select the "Summary" link to return to the Summary View.
Flagged transactions in DM are generally referred to as At Risk Transactions. Within the entire population of At Risk Transactions are High Risk Transactions. These High Risk Transactions are a subset of the At Risk Transactions that are considered to be those transactions that are most at risk of misuse. These High Risk Transactions are triggered by an RPM score of 900 or above. As these transactions have received the high score by the RPM, A/OPCs are always required to perform an Independent Review on the High Risk Transactions. The A/OPC performs the Independent Review after the A/BO completes the initial review of the case.

The A/OPC is initially alerted to a High Risk Transaction by an email notification. The email notification is sent to the A/OPC at the same time the initial email notification is sent to the A/BO to disposition a case. When the A/BO closes the case, the A/OPC is sent a notice indicating that case has been closed and ready for the Independent Review.

All A/OPCs and above have the ability to review all the transactions for their organization within the DoD Government Purchase Card Program. These high-level users can perform an Independent Review on any closed case. By performing an Independent Review and providing their comments to the disposition of the case, these users are demonstrating that they are performing the due diligence required to oversee their organizations GPC Program.

The following steps are taken to perform an Independent Review:

1. Navigate to the Case Details page of a specific case.
2. Under the "Action History" section (Figure 5.4-1) there is an "Add Independent Review" button. This button only displays in Summary View.
3. The independent reviewer can see everything the A/BO has completed including the "Case Disposition" and "Notes" entered by the A/BO. After reviewing the A/BO's case
analysis, the independent reviewer clicks the "Add Independent Review" button and completes the information in the popup box (Figure 5.4-1) displayed documenting his/her assessment of the A/BO's determination. The user has the following choices for case disposition:

- Contract Payment
- Valid Transaction
- Administrative Discrepancy
- Misuse
- Suspected Fraud
- Abuse
- Lost
- Stolen

4. Users must include any discrepancies or justification in the comments field. Although comments are not required, it is recommended that comments be added to assist with the documentation of the case review.

5. If the independent reviewer disagrees with the A/BO assessment, the A/BO should be contacted to resolve the discrepancy. Note that once a case has been dispositioned by the A/BO, the original disposition cannot be changed.

![Figure 5.4-1 Case Details – Independent Review Popup](image)

### 5.5 Find Transactions

The "Find Transactions" tab is the second tab displayed within the main DM tab (Figure 5.5-1). Users may query all transactions within their hierarchy using the following criteria:
Account Type/Number (Cardholder Account number or Managing Account number)
Case Disposition
Transaction Date(s)
Independent Review
Merchant Name
MCC
Amount ($)

Note that while the primary purpose of the Case Management tab is to show transactions that have been referred by the application, it is possible for users to search through all purchase card transactions for review. The Find Transactions Screen (Figure 5.5-1) is described in detail below. The screen is annotated with numbers and each number refers to a corresponding description.

Figure 5.5-1 Find Transactions – Search

1. Users can find transactions based on a number of variables under "Find Transactions." Selecting the minimize button ( [- ] ) next to "Find Transactions" hides the search. Alternatively, selection the maximized button ( [+] ) show the selection criteria.

2. The account can be queried either by Cardholder or Managing Account. This type of account search is accomplished by selection CH for Cardholder Account or MA for Managing Account. Once the type of account is selected, then the account number is entered. A partial account number is acceptable and implied wildcards are interpreted by the application (i.e., enter the known account numbers). Note that the query runs quicker with the most complete information (i.e., the complete account number runs quicker than five characters of the account number).

3. Filtering can be done by the status of the case. Selecting one of the following Case Status selections:

   All
4. Filtering can be done by selecting one of the following case disposition selections:
   - All
   - Contract Payment
   - Under A/BO Review
   - Valid Transaction
   - Administrative Discrepancy
   - Misuse
   - Suspected Fraud
   - Abuse
   - Lost
   - Stolen

5. Additional filtering criteria can be entered by selecting a beginning and ending Transaction Date(s).

6. The Independent Review selection criteria can be used to quickly find those cases that are “Pending” and Independent Review and those cases that have a “Completed” Independent Review. If this selection criterion is not to be used, then use the default “Select” criteria.

7. Additional fields that can be added to the selection criteria are Merchant Name, MCC (Merchant Category Code), and Amount ($).

8. A specific transaction can be located using the Case Number. To locate a transaction using the Case Number, the Case Number is the only entry necessary.
   Once the find selection criteria are entered on the screen, the user clicks the "Find" button to execute the search. Clicking the "Clear" button clears all of the entries on the screen (i.e., all fields are set to blanks). If the search is too large, the system will display a warning message requesting that the user refine the search.

9. In the example below (Figure 5.5-2), a partial Managing Account Number is entered, date range, dollar value range, and a partial Merchant Name. An implied wild card is automatically entered before and after the text in the merchant name field. So, the search returns any transactions that contain “6425” within the Managing Account, are between 01/01/2015 and 06/30/2015, are between $2,000 and $3,000, and the Merchant Name has “gov” anywhere within it.
10. Results are displayed by Transaction Date, Status, Disposition, Independent Review, Type, Account #, Last Name, Amount, Merchant, MCC, and View.

Note: The resulting data can be sorted by clicking on the column heading (Transaction Date, Status, Disposition, Independent Review, Type, Amount, or Merchant). In this example, the data was sorted according to amount (ascending order). To sort in descending order, click on the heading again and this action reverses the sort.

11. When results are displayed, the user may view a transaction by clicking on the "View" or "Create" buttons under the "View" column. Clicking the "View" or "Create" button displays the Case Details page for the selected transaction. Users from all hierarchy levels can "Create" cases for review by the A/BO. For more details and guidance on self-initiating a case, see Section 5.6 Self-Initiating Cases.

5.6 Self-Initiating Cases

Self-Initiating Cases is the process by which a transaction that previously has not been flagged as at risk by RPM becomes a flagged case that requires review by the A/BO. The rows that are highlighted in blue are transactions that require disposition. Most of these cases will have been flagged as at risk by the model. Some may have been self-initiated. Users from all hierarchy levels can self-initiate cases. Only the A/BO user level can take action on cases, all other users will only be able to create the case.

The user performs this action from either the “Account Details” screen under the “Case Management” tab (Figure 5.3.2-1) or the “Find Transactions” screen (Figure 5.6-1). The actual self-initiated case creation is accomplished by clicking on the “Create” button in the View Column (Figure 5.6-1). Legacy Cases may be self-initiated. To self-initiate a Legacy Case, the user clicks on the View button in the View Column (Figure 5.6-2). Once a case is self-initiated, it must be dispositioned. There is a warning pop-up that is displayed and must be checked off before the case is actually self-initiated, but there is no way to cancel a self-initiation once the
action has been taken to self-initiate. So, once this action is undertaken, it cannot be reversed. Also, once the case has been self-initiated, an email notification is sent by the application to the appropriate parties in the same manner had the model flagged the transaction. Additionally, the self-initiated case follows the standard escalation schedule the same as if the transaction was flagged by the model.

Figure 5.6-1  Self-Initiating a Case

Figure 5.6-2  Self-Initiating a Legacy Case
6.0 APPENDIX A – ABBREVIATIONS, ACRONYMS, AND DEFINITIONS

Abbreviations, acronyms, and terms are defined in this appendix.

A/BO: Approving/Billing Official
A/OPC: Agency/Organization Program Coordinator
AIM: Authorization, Issuance, and Maintenance
CAC: Common Access Card
CDRL: Contract Data Requirements List
DAU: Defense Acquisition University
DI: Data Item
DoD: Department of Defense
DM: Data Mining
DMDC: Defense Manpower Data Center
EMMA: Enterprise Monitoring and Management of Accounts
FAR: Federal Acquisition Regulation
FICO: Fair Isaac Corporation
FOUO: For Official Use Only
GUI: Graphical User Interface
HCA Agent: Head Contracting Activity Agent
ID: Identification
JWOD: Javits-Wagner-O’Day program
NG: Northrop Grumman
NIST: National Institute of Standards & Technology
PCOLS: Purchase Card On-line System
PCPO: Purchase Card Policy Office
PC/SC: Personal Computer/Smart Card
PIN: Personal Identification Number

Purchase Card Abuse: Purchases of authorized goods or services at terms (e.g., price, quantity) that are excessive, for a questionable Government need, or both. Examples of such transactions include purchases of items such as day planner costing $300 rather than one costing $45; allowable refreshments at excessive cost; and year-end and other bulk purchases of computer and electronic equipment for a questionable Government need.

Purchase Card Fraud: Use of the Government purchase card to acquire goods or services that are unauthorized and intended for personal use or gain constitute a fraud against the Government.
Examples include a Cardholder’s unauthorized purchase of power tools for his/her home; a vendor’s intentional charges for services not provided; and the unauthorized use by a third party of a Cardholder’s compromised or stolen account for personal gain.

Purchase Card Misuse: Government purchase card transactions that are intended for Government use, but are not permitted by law, regulation, or organization policy. They are generally considered improper. Examples include certain types of purchases of meals or refreshments for Government employees within their normal duty stations; purchases split to circumvent micro purchase or other single purchase limits; and purchases from other than statutorily designated sources, such as the Javits-Wagner-O’Day program (JWOD).

RA: Risk Assessment
RAD: Risk Assessment Dashboard
RPM: Risk Predictive Model
SRS: Sign-on and Referral System
# APPENDIX B – EMAIL NOTIFICATION SCHEDULE AND SAMPLE EMAILS

## B-1 New Case Notification Schedule

<table>
<thead>
<tr>
<th>PCOLS DM Application Process Step</th>
<th>When</th>
<th>PCOLS/SRS Sends Email to…</th>
<th># of Business Days Elapsed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Send initial referral to PCOLS</td>
<td>Newly flagged case</td>
<td>Primary A/BO, Alternate A/BO &amp; A/BO Supervisor</td>
<td>0</td>
</tr>
<tr>
<td>Send referral #2 if no action</td>
<td>After 10 days once initial referral sent</td>
<td>Primary A/BO, Alternate A/BO &amp; A/BO Supervisor</td>
<td>11</td>
</tr>
<tr>
<td>Send referral #3 if no action</td>
<td>5 days after referral #2</td>
<td>A/OPCs &amp; A/OPC Supervisor</td>
<td>16</td>
</tr>
<tr>
<td>Send referral #4 if no action</td>
<td>5 days after referral #3</td>
<td>A/OPCs &amp; A/OPC Supervisor</td>
<td>21</td>
</tr>
<tr>
<td>Send referral #5 if no action</td>
<td>5 days after referral #4</td>
<td>Level 3s</td>
<td>26</td>
</tr>
<tr>
<td>Send referral #6 if no action</td>
<td>5 days after referral #5</td>
<td>Level 3s</td>
<td>31</td>
</tr>
<tr>
<td>Send referral #7 if no action</td>
<td>5 days after referral #6</td>
<td>Level 2s</td>
<td>36</td>
</tr>
<tr>
<td>Send referral #8 if no action</td>
<td>5 days after referral #7</td>
<td>Level 2s</td>
<td>41</td>
</tr>
<tr>
<td>Send referral #9 if no action</td>
<td>3 days after referral #8</td>
<td>PCPO</td>
<td>46</td>
</tr>
<tr>
<td>Send referral #10 if no action</td>
<td>5 days after referral #9</td>
<td>PCPO</td>
<td>51</td>
</tr>
<tr>
<td>No further referrals sent</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Note:** All intervals are in terms of business days

## B-2 Pending Case Notification Schedule

<table>
<thead>
<tr>
<th>PCOLS DM Application Process Step</th>
<th>When</th>
<th>PCOLS/SRS Sends Email to…</th>
<th># of Business Days Elapsed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Case set to Pending</td>
<td>N/A</td>
<td>N/A</td>
<td>0</td>
</tr>
<tr>
<td>Send referral #1 for pending case</td>
<td>10 days once set to pending</td>
<td>User who set to Pending (Sent in notification as EDIPI)</td>
<td>11</td>
</tr>
<tr>
<td>Send referral #2 for pending case</td>
<td>5 days after referral #1</td>
<td>Pending User + 1 Escalation</td>
<td>16</td>
</tr>
<tr>
<td>Send referral #3 for pending case</td>
<td>5 days after referral #2</td>
<td>Pending User + 2 Escalation</td>
<td>21</td>
</tr>
<tr>
<td>Send referral #4 for pending case</td>
<td>5 days after referral #3</td>
<td>Pending User + 3 Escalation</td>
<td>26</td>
</tr>
</tbody>
</table>
### Appendix B

#### B-2 Data Mining Application

<table>
<thead>
<tr>
<th>PCOLS DM Application Process Step</th>
<th>When</th>
<th>PCOLS/SRS Sends Email to…</th>
<th># of Business Days Elapsed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Send referral #5 for pending case</td>
<td>5 days after referral #4</td>
<td>Pending User + 4 Escalation</td>
<td>31</td>
</tr>
<tr>
<td>No further referrals sent</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Note:** All intervals are in terms of business days

### B-3 High Risk Case Notification Schedule

<table>
<thead>
<tr>
<th>PCOLS DM Application Process Step</th>
<th>When</th>
<th>PCOLS/SRS Sends Email to…</th>
<th># of Business Days Elapsed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Send initial referral to PCOLS</td>
<td>N/A</td>
<td>A/OPC</td>
<td>0</td>
</tr>
<tr>
<td>Send completed case</td>
<td>A/BO closes case</td>
<td>A/OPC</td>
<td>N/A</td>
</tr>
<tr>
<td>No further referrals sent</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The following sections contain sample email notifications that the A/BO and A/OPC would expect to see.

#### B-4 Sample Flagged Transaction

From: <PCOLS_noreply@dmdc.osd.mil>
Date: Thu, Aug 8, 2015 at 2:27 AM
Subject: [PCOLS DM ACTION] Flagged Transaction
To: ss@sterlingheritage.com, michael.d@dla.mil, jchad@sterlingheritage.com
Cc: Terri.k.S.CTR@mail.mil

In accordance with MID 904, the Department of Defense has developed a data mining capability to identify purchase card transactions at risk of fraud, misuse or abuse. Additionally, a small number of transactions have been randomly selected to assist in the refinement of the application.

The following transaction in your Managing Account has been selected for review:
Cardholder Account Number: *1361
Cardholder Name: Terri K S
Primary A/BO Name: James H Chad
TBR Hierarchy: 47163-00005-05555-24435
Case Number: 1183869
Transaction ID: 0051c5bbf50bc334
Date of the Transaction: 08-06-2015 13:04:29
Merchant Name: KCTCS
Transaction Amount: $1,620.00

You are required to initiate and complete a review of the subject transaction. If action is not taken in a timely manner, the transaction will be forwarded to your Agency/Organization Program Coordinator for their action.

You must perform the following steps to complete a review of this transaction:
1. Access PCOLS using the link below.
   
2. Authenticate yourself using your Common Access Card (CAC)
3. Select your role associated with this account (TBR Hierarchy 47163-00055-05555-24435).
4. Complete the case review.
5. Enter a disposition and, if required, the planned action. If additional research is required, you may select a disposition of "Under A/BO Review" and return at a later time to enter the correct disposition of the case.
6. Click Save to complete the case review.

The following users in organization Production Support/DMRA are authorized to complete the review of this transaction for Managing Account *6453:
Primary A/BO:    James H Chad
Alternate A/BO:   Michael W Diff
Alternate A/BO:   Sri S
A/BO Supervisor: Terri K S

If this information needs to be updated, please contact your designated Agency/Organization Program Coordinator to have necessary user changes completed in EMMA and AIM.

For account-related inquiries, please contact your designated Agency/Organization Program Coordinator. For PCOLS technical support, including system access, please contact the PCOLS help desk at the following phone numbers.

For account-related inquiries, please contact your designated Agency/Organization Program Coordinator. For PCOLS technical support, including system access, please contact the PCOLS help desk at the following phone numbers.

- US (CONUS) - Commercial (toll-free): 1-800-376-7783
- OCONUS - DSN: 661-7307
- Direct dial: 269-961-7307

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PCOLS Logon: https://pki.dmdc.osd.mil/appj/pcols-web/

PCOLS user manuals and training material can be downloaded from the Defense Acquisition University (DAU) website: https://acc.dau.mil/pcols

**B-5 Sample High Risk Transaction**

From: PCOLS_noreply@dmdc.osd.mil [mailto:PCOLS_noreply@dmdc.osd.mil]
Sent: Wednesday, April 20, 2016 10:33 PM
To: dennis.w.civ@mail.mil; chris.w@dla.mil;
Subject: [PCOLS DM ACTION] High Risk Transaction

In accordance with MID 904, the Department has developed a data mining capability to identify purchase card transactions at risk of fraud, misuse or abuse. Additionally, a small number of transactions have been randomly selected to assist in the refinement of the application.

The following transaction was selected for review:

Cardholder Account Number: *7348
Cardholder Name: Thomas S Magnum
Primary A/BO Name: Andy Lyon CASTE
TBR Hierarchy: 47163-00057-00016-06698-69061
Case Number: 1786475
Transaction ID: 0057164715008fa7
Date of the Transaction: 04-16-2016 04:06:17
Merchant Name: US TOY/CONSTR PLAYTHINGS
Transaction Amount: $2,873.74
Score assigned to the Transaction by the DM Model: 952

The transaction was sent to the Approving/Billing Official for their review. However, due to the high risk of this transaction (i.e., very high transaction score) a review by an individual other than the Approving/Billing Official is warranted.

Upon A/BO completion of their review of the transaction, the A/OPC is required to complete an independent review of this transaction.

To review the transaction:
1. Access PCOLS using the link below.
2. Authenticate yourself using your Common Access Card (CAC)
3. Select your role associated with this account (TBR Hierarchy 47163-00057-00016-06698-69061).

Note: If you are no longer associated with this account, contact the A/OPC, Ryan P Newman, at ryan.newman@us.af.mil for assistance in removing you from your PCOLS role.

For PCOLS technical support, including system access, please contact the PCOLS help desk at the following phone numbers.

. US (CONUS) - Commercial (toll-free): 1-800-376-7783
. OCONUS - DSN: 661-7307
. Direct dial: 269-961-7307

PCOLS Logon: https://pki.dmdc.osd.mil/appj/pcols-web/

PCOLS user manuals and training material can be downloaded from the Defense Acquisition University (DAU) website: https://acc.dau.mil/pcols

B-6 Sample Closed Case

From: PCOLS_noreply@dmdc.osd.mil [mailto:PCOLS_noreply@dmdc.osd.mil]
Sent: Thursday, February 04, 2016 12:38 PM
To: terri.k.s.ctr@mail.mil; ljames.h.10.ctr@mail.mil
Cc: geeta.d.ctr@osd.pentagon.mil
Subject: [PCOLS DM] Transaction Review Completed

The A/BO has completed their review of the transaction referenced below. At your discretion, you may perform an independent review on this transaction.

The transaction has been given a disposition of: Contract Payment

The following is a summary of the transaction:

Cardholder Account Number: *1361
Cardholder Name: Terri K S
To complete an independent review of this transaction:
1. Access PCOLS using the link below.
2. Authenticate yourself using your Common Access Card (CAC)
3. Select your role associated with this account (TBR Hierarchy 47163-00005-00055-05555-24435).
4. Review the transaction.
5. Click Add Independent Review
6. Enter a disposition and, if required, the planned action.
7. Click Save to complete the independent review.

For PCOLS technical support, including system access, please contact the PCOLS help desk at the following phone numbers.

   US (CONUS) - Commercial (toll-free): 1-800-376-7783
   OCONUS - DSN: 661-7307
   Direct dial: 269-961-7307

------------------------------------
PCOLS Logon: https://pki.dmdc.osd.mil/appj/pcols-web/

PCOLS user manuals and training material can be downloaded from the Defense Acquisition University (DAU) website: https://acc.dau.mil/pcols

B-7  Sample Pending Case Notification

From: PCOLS_noreply@dmdc.osd.mil [mailto:PCOLS_noreply@dmdc.osd.mil]
Sent: Thursday, January 28, 2016 3:36 PM
To: allen.beatley@ngc.com; clayegreene@techblue.com; jchadwick@sterlingheritage.com
Cc: terri.k.s ctr@mail.mil; jchadwick@sterlingheritage.com; shobha.s ctr@mail.mil;
    allen.beatley@ngc.com; clayegreene@techblue.com; elliott.swan@ngc.com;
Subject: [PCOLS DM ACTION] Case Review

The following transaction was flagged by the Data Mining application for your review.

Cardholder Account Number: *1361
Cardholder Name: Terri K S
Primary A/BO Name: James Herbert
TBR Hierarchy: 47163-00005-00055-05555-24435
Case Number: 1720052
Transaction ID: 0051fbf0dd0000b9
Date of the Transaction: 03-01-2013 13:04:29
Merchant Name: SERVICE POINT -- P
Transaction Amount: $850.00
A review was initiated as required. In the initial notification email, you were instructed to complete the review in a timely manner. To date, this case remains open. To avoid escalation to the A/OPC, complete the review without delay.

You must perform the following steps to complete a review of this transaction:

1. Access PCOLS using the link below.
2. Authenticate yourself using your Common Access Card (CAC)
3. Select your role associated with this account (TBR Hierarchy 47163-00005-00055-05555-24435).
4. Complete the case review.
5. Enter a disposition and, if required, the planned action.
6. Click Save to complete the case review.

Note: If you are no longer associated with this account, contact the A/OPC, Terri K S, at terri.k.s ctr@mail.mil for assistance in removing you from your PCOLS role.

For account-related inquiries, please contact your designated Agency/Organization Program Coordinator. For PCOLS technical support, including system access, please contact the PCOLS help desk at the following phone numbers.

- US (CONUS) - Commercial (toll-free): 1-800-376-7783
- OCONUS - DSN: 661-7307
- Direct dial: 269-961-7307

PCOLS Logon: https://pki.dmdc.osd.mil/appj/pcols-web/

PCOLS user manuals and training material can be downloaded from the Defense Acquisition University (DAU) website: https://acc.dau.mil/pcols

The following notifications were sent previously for this case.
A/BO Initial Review: Claye Adel (claye@techblue.com) 12-29-2015 08:47:04 PST
A/BO Initial Review: George Allen (allen.b@ngc.com) 12-29-2015 08:47:04 PST
A/BO Initial Review: Suzanne Schultz (suzanne.s@ngc.com) 12-29-2015 08:47:04 PST
A/BO Initial Review: James Herbert (jh@sterlingheritage.com) 12-29-2015 08:47:04 PST
A/BO Initial Review: Terri K S (terri.k.s ctr@mail.mil) 12-29-2015 08:47:05 PST

B-8 Sample Escalated Case Notification

From: PCOLS_noreply@dmdc.osd.mil [mailto:PCOLS_noreply@dmdc.osd.mil]
Sent: Friday, May 27, 2016 10:29 AM
To: denise.a.civ@mail.mil; lw@sterlingheritage.com
Subject: [PCOLS DM ACTION - SECOND REQUEST] Escalated Flagged Transaction

The Approving/Billing Official (A/BO) was sent the following email and a second request for action. The action was also escalated to the Agency/Organization Program Coordinator and the Level 3. To date, the review has not been initiated. Please contact the A/BO to facilitate their action. To avoid further escalation, timely action must be taken.

The following notifications were sent previously for this case.
A/BO Initial Review: No user was provisioned to receive this notification. 04-14-2016 14:53:01 PDT
A/BO Reminder: No user was provisioned to receive this notification. 04-14-2016 14:53:07 PDT
A/OPC Escalation: Alexis J (alexis.j6.civ@mail.mil) 04-14-2016 14:53:12 PDT
In accordance with MID 904, the Department of Defense has developed a data mining capability to identify purchase card transactions at risk of fraud, misuse or abuse. Additionally, a small number of transactions have been randomly selected to assist in the refinement of the application.

The following transaction in your Managing Account has been selected for review:

Cardholder Account Number: *1097
Cardholder Name: Richard THURSTINESS
Primary A/BO Name: John Ryan
TBR Hierarchy: 47163-00007-00011-21110-13419
Case Number: 1782326
Transaction ID: 0056cc82090d7967
Date of the Transaction: 04-11-2016 03:19:24
Merchant Name: SIGNAL TECHNOLOGIES, LLP
Transaction Amount: $826.05

You are required to initiate and complete a review of the subject transaction. If action is not taken in a timely manner, the transaction will be forwarded to your Agency/Organization Program Coordinator for their action.

You must perform the following steps to complete a review of this transaction:
1. Access PCOLS using the link below.
2. Authenticate yourself using your Common Access Card (CAC)
3. Select your role associated with this account (TBR Hierarchy 47163-00007-00011-21110-13419).
4. Complete the case review.
5. Enter a disposition and, if required, the planned action. If additional research is required, you may select a disposition of "Under A/BO Review" and return at a later time to enter the correct disposition of the case.
6. Click Save to complete the case review.

The following users in organization WCRRN (Johnson) are authorized to complete the review of this transaction for Managing Account *2692:
Primary A/BO: John Ryan
A/BO Supervisor: Venus S Williams

If this information needs to be updated, please contact your designated Agency/Organization Program Coordinator to have necessary user changes completed in EMMA and AIM.
For account-related inquiries, please contact your designated Agency/Organization Program Coordinator. For PCOLS technical support, including system access, please contact the PCOLS help desk at the following phone numbers.

- US (CONUS) - Commercial (toll-free): 1-800-376-7783
- OCONUS - DSN: 661-7307
- Direct dial: 269-961-7307


PCOLS user manuals and training material can be downloaded from the Defense Acquisition University (DAU) website: [https://acc.dau.mil/pcols](https://acc.dau.mil/pcols)
8.0 APPENDIX C – DATA MINING COMMON ISSUES

This appendix describes common issues that have been identified with the DM Application. The document was originally developed to assist the PCOLS Help Desk provide a standard response to common issues coming in to the help desk from the field. Subsequently, the issues were updated for distribution to the field for the front lines users themselves.

C-1 A/OPC Confusing High Risk Notification with Escalated Flagged Transaction Notification

Issue:
A/OPCs are not recognizing the differences between High Risk Notifications and Escalated Flagged Transaction Notifications.

Resolution:
There are two basic types of flagged transaction notifications that an A/OPC will receive. The first is the High Risk Notification. This notification is to inform the A/OPC that they are required to perform an Independent Review of the transaction because of the high risk nature of the transaction. These notifications are triggered if the case receives a very high score. Currently, the high score threshold is set to 900.

The second type of transaction notification is the escalated flagged transaction. This notification is for a regularly flagged transaction that has not been completed in the allotted time frame. As such, the case has been escalated.

C-2 Role Does Not Have the Privileges to Review the Transaction

Issue:
End user is receiving an error in DM stating that “Your role does not have the privileges to review the transaction.”

Resolution:
The DM application allows users to have multiple roles. The end user must select the appropriate role for each case that they are interested in viewing/updating. If the appropriate role is not selected, the application will prevent access to a specific case. Specific situations where this would happen would be if the end user selects a case (case number hyperlink) from the SRS screen and does not select the appropriate role for the case. Another situation would be that one A/BO is forwarded an email from another A/BO with a link for a specific case that they do not have access to.

Users must be aware of what cases they have access to. Within the email notifications there is the TBR hierarchy that will allow the user to determine the appropriate TBR hierarchy to select at logon time (Role Selection in DM).
Figure C.2-1 shows the typical message returned for situation mentioned above.

![Image of message](Image)

**Figure C.2-1**  Sample Message for User without Privileges to Review Transaction

C-3 No Role

**Issue:**
End user is able to log on to DM, but there are no roles to select.

**Resolution:**
The DM application allows a valid user to logon without having a specific role. This situation has generally gone away since the delay in processing and loading the hierarchy file has been eliminated, but there could be instances where this situation does occur if the user tries to access DM prior to the hierarchy file load. Currently, there are two hierarchy file loads per day.
The end user should see their role come up within one business day of being associated with an account in AIM. A user should wait a full business day before calling the help desk regarding this issue.
C-4 Disputed/Duplicate Transactions

Issue:
End users have reported that they are seeing duplicate transactions coming through DM.

Resolution:
While it may appear that there are duplicate transactions in DM, the bank is sending both an original transaction and a disputed transaction through to HNC/FICO. As such, both transactions are going through the Risk Predictive Model (scoring model). The original transaction may be flagged. Disputes are not flagged by the model.

It should be noted that the transactions are in fact different transactions. Typically, they have a different transaction type. One has a "U" and the other has an "O".

\[ U = \text{Disputed or Declined transaction} \]

\[ O = \text{Merchandise, supplies, services, other Cardholder purchases} \]

These transactions are not duplicates. DM has been updated to disallow the users to create a case through the self-initiation feature. Currently, a user will receive a message similar to the message shown in Figure C.4-1 if they try to self-initiate a Type “U” transaction.

To clarify how DM works – If an AO in to the Case Statistics screen, there are two categories of transactions. One (blue bar) is where the model flags a case. The view column will show a VIEW button for this type of case. The second is a regular transaction (white bar). The View column shows a CREATE button for this type of case. If the AO selects the CREATE button for a white bar case, then that case will be self-initiated. Basically, it goes to a blue bar case.
C-5 Flagged Transactions for T9 accounts

Issue:
Problem exists where the card account has been T-9’d due to fraud (terminated) and the DM application flagged one of the transactions. The A/BO cannot see this account to do the review.

Resolution:
There is a system limitation in DM that will not allow the A/BO to disposition a case in this particular circumstance. Basically, when the card is terminated, then there is no way to associate the A/BO in DM.

C-6 A/BO Not Receiving Notifications

Issue:
A/BOs have reported that they are not receiving DM Flagged Transaction notifications.

Resolution:
A number of situations have been reviewed where the A/BOs (or A/OPCs) have reported that the initial flagged transaction notifications are not being received. In each instance, it was confirmed that the notification server has been sending the emails. While confirmation cannot be made with absolute certainty that the emails have been sent to a specific site, there are records of the emails being generated and sent from the server.

It is up to the local installations to determine why the emails are not being received. It is possible that SPAM filters are deleting the emails or that the end users are ignoring/deleting the emails.

C-7 A/OPC Receiving Escalation Notices Too Quickly

Issue:
A/OPCs have reported that they are receiving DM Flagged Transaction escalation notices prior to the A/BO receiving any notifications.

Resolution:
Initial emails are sent to the Primary A/BO, Alternate A/BOs, and the A/BO Supervisor. If the emails addresses are not available for these individuals, then the notification process will continue up the escalation chain. The next email (second notice) would be addressed to the same individuals (Primary A/BO, Alternate A/BO, and the A/BO Supervisor). Again, if the email addresses are not available, then the notification continues up the escalation chain.

The next email would be to the A/OPC and A/OPC Supervisor.

There are various reasons for email addresses not being available to the notification process, but generally it is a result of individuals being removed from their role in EMMA. Once they are removed, then the notification process cannot locate their email addresses.

C-8 Case Manager Case Statistics

Issue:
Users are confused when trying to use the Case Manager Case Statistics monthly cycles filter. Case Statistics can be view in the ALL mode or a specific month can be selected (rolling 18 months).
Resolution:
FICO reports that the application is performing as designed. Basically, the monthly stats show what is happening in a particular month. But, if the case transaction date was from a previous month, it will not be displayed by the Graphical User Interface (GUI) for the current month.

During any one month, the NEW cases will be a count of all the new cases that are generated through the month. If a NEW case is moved to Under A/BO Review or closed during the month, then the NEW case count will be decremented by that number and added to the other counts. If any case is closed in the month, then the CLOSED case count will be incremented during the month. The CLOSED case can be from a previous cycle (based on transaction date), but will be counted for the current cycle. At the end of the month, the cycle statistics are frozen and never updated again.

So, as mentioned above, if the CLOSED case link is clicked for a specific cycle, the results may or may not return the number of CLOSED cases (the hyperlink number that was clicked on) that was frozen at the end of the cycle. If all cases were closed in the same cycle as the transaction date, it would be OK. If some cases were CLOSED and the transaction date was from previous cycles, they would not show up. This is the part that is confusing to the end users.

C-9 Recent At Risk Transaction Notifications

Issue:
Field users have asked about the list of recent At Risk Transaction notifications on the SRS screen. They are questioning the criteria for the list, and also if the list is updated when cases are dispositioned.

Resolution:
The last ten (10) notifications are listed on the SRS screen (see Figure C.9-1). This listing is updated when another, newer notification is sent. As such, there is no specific time frame on the notification list. Also, the notification list does not delete the notification from the list when the A/BO dispositions the case.
Figure C.9-1  Last Ten Notifications Displayed on SRS Screen

C-10  Disposition of a Dispute

Issue:
Field users have asked how to properly disposition a case for a disputed transaction.

Resolution:
There have been some issues as to whether or not to disposition the case as a Valid Transaction since the transaction itself has been disputed with the bank. Be aware that once the first interview question is answered “Yes” for a Dispute, then all of the rest of the interview questions are greyed out. So, all that is left to do is select the appropriate disposition of the case.

Given the technical challenge that there is no explicit disposition of “Dispute”, the case can legitimately be dispositioned as “Valid” as long as the Cardholder initiated the Dispute with the bank prior to the notification by the A/BO that there was an issue. For example, when a contractor inappropriately charges the card and the Cardholder realizes what happened and disputes the transaction, the Cardholder’s actions are "Valid" and exactly what you would want him/her to do. (Please note it is more likely that the Cardholder agreed to automatic annual renewal at initial purchase by clicking a button--and then did not proactively follow-up and cancel the automatic follow-on transaction in a timely manner, which creates bigger issues for your program ranging from unauthorized commitments, Anti-Deficiency Act violations (because the CH obligated funds that had not yet been appropriated), etc.).

If the only reason the Cardholder disputed the transaction was because it was flagged by DM and brought to the attention of the Cardholder by the A/BO, then the case should not be dispositioned as “Valid”. In this scenario, the Cardholder needs to be trained to ensure the situation does not recur. Also, counseling to the Cardholder and/or A/BO about proper procedures when
purchasing license agreements that has “fine print” may need to occur. While not ideal, the good news in this scenario is that by calling attention to the transaction, DM helped to ensure the transaction was disputed in a timely manner. As this scenario should not be dispositioned as “Valid”, the appropriate recommended disciplinary (corrective) action must be selected.