SDDC-PP Advisory 14-00x

Date: xx September 2014

From: SDDC-PP, Scott AFB, IL

To: Department of Defense Personal Property Non-Temporary Storage (NTS) Transportation Service Providers (TSPs)

Subject: **NTS INVOICE RECONCILIATION PROJECT**

1. **BACKGROUND:** In an effort to resolve NTS TSP concerns regarding unpaid NTS manual invoices prior to the implementation of the NTS Third Party Payment System (TPPS), SDDC Regional Storage Management Offices (RSMOs) requested the NTS TSP community identify the affected invoices in June 2013.
2. **DATA COLLECTED:** From July 2013 through February 2014 the RSMOs received a total of 16,033 invoice records dated 2004 through 2013.
3. **RESULTS:** The Defense Finance and Accounting Services (DFAS), SDDC, and the Joint Services performed an extensive review and analysis of the data provided, and manually conducted research on a subset of the records received. This research revealed a substantial percentage of the records provided were:
	1. incomplete or erroneous
	2. already paid
	3. older than the three (3) year statute of limitations period
	4. post NTS TPPS
4. Each record submitted required up to 45 minutes of manual research in multiple legacy financial/accounting and household goods systems to validate if invoices have been paid. This did not include the research for supporting documentation needed for certification and payment processing.
5. DoD resource constraints have forced the reevaluation of the project due to the fact that the same resources needed to research the aged unpaid invoices are also required to process current invoices.
6. After close evaluation of the submitted records, it became evident that a more systematic research process was required. Current efforts were discontinued in order to formulate a more efficient and expeditious methods to research, validate, and process outstanding records. Additionally, it became apparent that the invoice reconciliation was necessary for all types of HHG transportation records (i.e., DPM and HHG).
7. **DETERMINATION:** NTS TSPs are asked to resubmit their unpaid NTS manual invoice records PRIOR to TPPS using the following invoice submission guidelines identified, WITHIN the designated timeline, for this ONE TIME reconciliation project for NTS manual invoices only. This project is being collectively managed by a team of representatives from SDDC, the DOD Services, Coast Guard, and finance centers.
8. **INVOICE SUBMISSION REQUIREMENTS:** NTS TSPs are required to use the Excel spreadsheet “SDDC NTS PRE TPPS Invoice Tracker 10 SEP 2014”. Instructions for completing the tracker are provided in the spreadsheet. Strict adherence to the guidelines will ensure that the research can be accomplished in an expeditious manner. Due to the volume of claims for payment, trackers found to be incomplete or inaccurate (invoices already paid) will be returned. Invoice Trackers must be sent via email to: USARMY.SCOTT.SDDC.MBX.PROPERTY@MAIL.MIL with “NTS Invoice Tracker” in the subject line and will be accepted no later than close of business CST on 05 January 2015. It is imperative that NTS TSPs DO NOT submit the same invoices to the PPSO/CPPSO/JPPSOs, as this may delay processing of aged or current invoices.
9. **STATUE OF LIMITATIONS (aka THREE (3) YEAR RULE):** The statute of limitation to submit an invoice for payment is located in Title 31 U.S.C. Section 3702: Payment for Transportation which states in part: “(c) (2) A claim under this section shall be allowed only if it is received by the Administrator not later than 3 years (excluding time of war) after the later of the following dates: accrual of the claim, payment for the transportation is made, refund for an overpayment, or deduction from an amount subsequently due.”
10. Guidelines for invoices submitted on tracker worksheet:
	1. For invoices older than three (3) years, the TSP must be able to prove they invoiced within the three years, and that the invoice was received by the JPPSO/CPPSO/PPSO
	2. If the invoice was returned as improper, the TSP must demonstrate that they re-billed, as the three (3) year rule does not restart for this reason
	3. If the TSP disagrees with denial of payment for a claim, they have the right to appeal to the Civilian Board of Contract Appeals, <http://www.cbca.gsa.gov/>
11. **NEXT STEPS:** All invoice submissions will be reviewed for prior payment. Each of the DoD Joint Services and Coast Guard will receive a list of the submitted records and monitor validation of charges. TSPs may be asked to provide supporting documentation (i.e., original TOPS invoice, weight tickets). This will be a manual and resource intensive process. Certified invoices will be sent to the appropriate financial center for payment processing and a Service representative will notify TSPs individually upon submission.
12. **OTHER INVOICES:**
	1. HHG and DPM invoices will be addressed at a later date
	2. POST TPPS (eBills): Invoice inquiries should be addressed directly to the responsible JPPSO/CPPSO/PPSO
13. Our goal is to properly reconcile and process all valid NTS invoices. It is imperative that TSPs, SDDC, DoD Joint Services, Coast Guard, and finance centers closely coordinate efforts to accomplish the objectives in a streamlined, efficient, and expeditious manner.
14. This is a coordinated SDDC, DoD Joint Services, Coast Guard and finance center message.
15. All questions and concerns should be sent via email to USARMY.SCOTT.SDDC.MBX.PROPERTY@MAIL.MIL with “NTS Invoice Tracker Question” in the subject line.
16. This message is approved for release by Craig McKinley, Chief, Acquisition & Services Division, Personal Property Directorate, HQ SDDC.