Card Acquiring Service (CAS) Transaction Thresholds

July 29, 2020
Housekeeping

Guidelines for today’s session

• We kindly ask to keep lines on **mute**
• Moderator will place lines on **lecture mode** for quality assurance
• Please do not place calls on hold; feel free to disconnect and dial back in if you need to step away
• To ask questions: enter your question in the **Q&A message** feature or questions can be submitted to the CAS Outreach Mailbox (**CardAcquiringService@fiscal.treasury.gov**)
• To comply with the rules outlined by Treasury’s Legislative and Public Affairs Division, no presenter(s) will disclose their identities.

*This webinar will be recorded*
Purpose: Why are you here?

Objectives:

• To educate agencies on the policies outlined by the Card Acquiring Service (CAS) program on transaction thresholds and non-compliance.

How:

• Provide agencies with a detailed synopsis of specific transaction thresholds outlined in the Treasury Financial Manual (TFM) Chapter 7000 - Volume 1, Part 5: Credit and Debit Transactions.

• Help our agency customers understand the ramifications of non-compliance for important card service rules and policies.
Overview: **Thresholds & Non-Compliance**

- TFM & CAS Card Rule Review
- Transaction Maximums
- Prohibition of Split Transactions
- Intra-governmental Card Transactions
- CAS Program Non-Compliance
- Next Steps
- Questions
What is the Treasury Financial Manual (TFM)?

- The TFM is the Department of the Treasury’s (Treasury’s) official publication of policies, procedures, and instructions concerning financial management in the Federal Government.

What are the CAS Card Rules?

- The card rules apply to federal agencies that are collecting or intend to collect obligations via credit or debit card. In addition to these requirements, an agency also must comply with and be bound by the rules and regulations governing all debit and credit card transactions accepted by the agency (collectively, the Network Rules), any of which may be altered or amended periodically and without notice.
CAS Transaction Thresholds & Non-Compliance
Policy: Limitations on Card Collections

Transaction Maximums

• Section 7045—Limitations on Card Collection Transactions
  – 7045.10—Transaction Maximums
  – CAS program agencies must limit credit card collections of an individual or multiple transactions to not exceed $24,999.99.

$24,999.99
Credit card MAX limit
Policy: Limitations on Card Collections

• Prohibition of Split Transactions
  – What is a “split transaction”?
    • A transaction obligation paid to which a customer uses one or more cards over the course of one or multiple days that result in an exceeded transaction maximum of over $24,999.

• Examples:
  Obligation Amount - $48,000

  - CARD 1: $24,999.99
  - CARD 2: $23,000.01
    $48,000
  - CARD 1: $24,999.99
  - CASH/ACH/Debit Card: $48,000
Policy: **Alternative Payment Options**

**Debit Card**
- No threshold limit

**Automated Clearing House (ACH)**
- $99,999,999.99 threshold limit
- $100,000 limit for Same Day ACH

**Check**

**Cash**
Policy: Intra-governmental Transactions

• Definition
  – An intra-governmental card transaction (IGT) is defined as a sale of goods or services, or collection of other obligation by one government agency from another government agency using a government-issued Card.

• Rules for Intra-governmental Transactions
  – Each agency is solely responsible for all fees associated with processing the transaction, including interchange, processing fees and charges for IGTs.
  – Failure to pay fees associated with IGT processing may subject an agency to the CAS Program Non-Compliant Notice and Suspension of Service Process.
Policy: Intra-governmental Transactions

Currently, the limit for IGT is $24,999.99

New limit to be implemented as of FY2021

1 October 2020, the limit for IGT will be $9,999.99 to decline at $10,000.00
Policy: IGT Alternative Payment Options

- Intra-Governmental Payment and Collection (IPAC)
  - IPAC is a way for Federal Program Agencies (FPAs) to transfer funds from one agency to another with standardized descriptive data.
  - Interagency Agreement (IAA)
  - TFM Chapter. 4700, Appendix 8 Intra-governmental Transactions (IGT) Buy/Sell
  - For more information on IPAC, please visit the IPAC webpage at: https://www.fiscal.treasury.gov/ipac/
CAS Program Non-Compliance Policy

CAS FPAs must abide by all Network Rules and policies outlined in Chapter 7000, Vol. 1 (Part 5) of the TFM. Agencies that fail to follow all applicable rules are subject to being placed on notice of non-compliance.

The CAS Program Non-Compliant Notice Process can be found following this link [https://tfm.fiscal.treasury.gov/v1/p5/c700.html](https://tfm.fiscal.treasury.gov/v1/p5/c700.html) and it includes the following steps:

- **Phase 1:**
  - **Date 1 – CAS sends Initial Notice to non-compliant agency**
  - **15 days**
  - **Expected response within 15 days after date 1**

- **Phase 2:**
  - **Date 2 – CAS sends Follow-up Notice to non-compliant agency**
  - **7 days of receipt**
  - **Expected response within 7 days of receipt of Follow-up Notice**

- **In order to restore services, non-compliant agencies must become compliant and submit a new CAS application**

- **Date 3 – CAS sends out Final Notice of Non-Compliance**
  - **CAS may suspend services to non-compliant agency**

The process includes:
- Agencies have 15 business days to respond to Initial Notice of Non-Compliance
- Agencies have 7 business days after receipt to respond to Follow-up Notice of Non-Compliance

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Next Steps - What’s up next?

1. We are asking participants to refresh themselves with the TFM, https://tfm.fiscal.treasury.gov/v1/p5/c700.html

2. Complete the post-webinar survey

3. Submit questions to the CAS Outreach Mailbox (CardAcquiringService@fiscal.treasury.gov)
Upcoming Webinars: Save the Date
Contact Information

CAS Agency Outreach Mailbox
CardAcquiringService@fiscal.treasury.gov

ARM Mailbox
ARM@fiscal.treasury.gov

For More Information
CAS Online: www.fiscal.treasury.gov/cas
Section 7045—Limitations on Card Collection Transactions
  – 7045.10—Transaction Maximums
  – 7045.20—Prohibition on Splitting Transactions
Section 7090—CAS Program Non-Compliant Notice and Suspension of Service Process
Section 7155—Intra-governmental Card Transactions
Appendix B - Glossary

ARM – Agency Relationship Management
CAS – Card Acquiring Service
FPA – Federal Program Agency
IGT – Intra-governmental Transactions
IPAC – Intra-governmental Payment and Collection
SSD – Settlement Services Division