
How To Waive EFT – Let Me Count the Ways

Participant Guide

Technology Enhanced Learning (TEL) Interactive

April 5, 2011



Welcome

Welcome to this TEL (Technology Enhanced Learning) training event. We are excited that you will be joining us today for *How To Waive EFT – Let Me Count the Ways* and look forward to helping you get as much out of this time as possible.

Your participation is an important part of this class. If you have a question, don't hesitate to ask. There are probably several others in the class who have the same question – you might as well be the one to ask. It is our goal that you leave class today with no unanswered questions.

How to Interact with the Instructor

We encourage you to ask questions and share your comments with the instructor(s) throughout this TELNPS course.

If you were physically in the classroom with the instructor, you would raise your hand to let her/him know you had a question or comment. Then you would wait for the instructor to recognize you and ask for your question. We are all familiar with that “protocol” for asking questions or making comments.

With TELNPS courses, there is also a “protocol” to follow to ensure you can easily ask questions and others can participate as well. It may seem a little strange at first asking a question of a

TV monitor. Remember, it is the instructor you are interacting with and not the monitor. As you ask more questions and participate in more TELNPS courses, you will soon be focusing only on the content of your question and not the equipment you are using to ask it.

As part of the TEL station equipment at your location, there are several push to talk microphones. Depending on the number of students at your location, you may have one directly in front of you or you may be sharing one with other students at your table.

When you have a question, press and hold down the push to talk button maintaining at distance at least 12-18 inches and say,

“Excuse me [instructor’s first name], this is [your first name]

at [your location]. I have a question (or I have a comment).”

Then release the push to talk button. This is important.

Until you release the button, you will not be able to hear the instructor.

The instructor will acknowledge you and then ask for your question or comment. Stating your name and location not only helps the instructor, but also helps other students who are participating at different locations to get to know their classmates.

COURSE OVERVIEW

Why a How To Waive EFT – Let Me Count the Ways program?

Are you doing all you can to ensure that your vendors accept EFT for their payments? If so, there may still be times when it just isn't feasible. Although those times should be quite rare, a waiver is available for situations where EFT simply won't work. This course is intended to teach you the requirements for requesting an EFT waiver, including self-certification and those requiring outside approval. Your vendors will appreciate your help in making the right decision and submitting a properly documented waiver request to ensure they get paid in a timely manner.

Target Audience

Regional Finance Officers and Administrative Officers. Others who may be interested in this course include third party draft agents, program managers, V.I.P. coordinators, regional travel coordinators, administrative assistants, deputy superintendents, and Charge Card A/OPCs, card holders, and convenience check writers.

Program Timing

This course will last 2 hours.

Learning Objectives

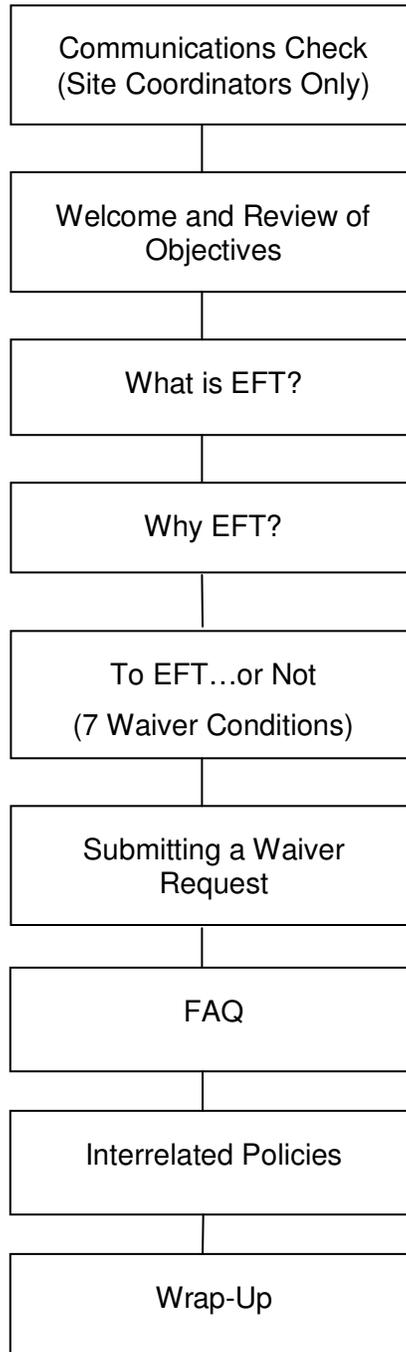
At the end of this TEL program, participants will be able to:

- Recognize the basic requirements for EFT payments (e.g., DCIA, Comptrollers' memo, definition of EFT and non-EFT).
- Given a set of facts, determine whether or not the payment can constitute a waiver request and be paid by a method other than EFT.
- Identify at least 3 reasons why it is important that all vendor payments are made through EFT.
- Given a scenario, identify which of the 7 waiver conditions is appropriate and who approves.
- Given sample waiver requests, determine whether they are complete and sufficient.
- Given sample data, complete a waiver request form.

Site Point-of-Contact Responsibilities

The TEL Station Site Point-of-Contact must reserve the training room, notify employees that the park will be participating in this TEL training event, make sure the Participant Guide is available to students, set up the TEL Station on the day of the training, ensure students sign in on the attendance roster, and finalize the Class Attendance Roster in DOI Learn.

Course Map



What is EFT?

Definitions

Electronic Funds Transfer (EFT) – A transfer of funds through any mechanism that does not require a transfer of paper between the parties. For example, payment made via a charge card, convenience checks associated with charge cards, or via an Automated Clearing House (ACH) payment through the Accounting Operations Center (AOC).

Non-EFT – Any method that requires a transfer of paper between the two parties in order to make the payment, with the exception of convenience checks. For example, payment made with a Treasury check.

Legal Requirements

- DCIA (1996)
- Comptroller's Memo (August 2010)

Important Points

- Federal employees CANNOT request waivers for their pay/reimbursement! All pay/reimbursement to federal employees should be made via EFT.
- All vendors must be registered in Central Contractor Registration (CCR), unless the vendor falls under one of the CCR registration exceptions outlined in the CCR policy and in the Federal Acquisition Regulations.
- Federal employees on temporary duty travel must use GovTrip/EFT for reimbursement.
- Refunds to individuals are sent to the Accounting Services Team at AOC (as per the National Park Service Payment Procedure Guide, page 41. http://www.aoc.nps.gov/documents/fst_docs.html). The refund will then be forwarded to the Fiscal Services Team (FST) and paid via Treasury Check if waiver was approved. Otherwise, it will be paid via EFT.

EXERCISE: EFT – OR NOT?

We will now determine whether or not a payment is considered EFT. This distinction is the basis for all further discussion. Refer to page 4 of this guide for the definition of EFT. Be prepared to support your answer.



Payment by charge card	EFT	Non-EFT
Invoice to AOC for payment by Automated Clearing House (ACH)	EFT	Non-EFT
Payment to a vendor registered in CCR	EFT	Non-EFT
Invoice to AOC for payment by Treasury Check	EFT	Non-EFT
Convenience Check	EFT	Non-EFT

NEED FOR EFT

Why is EFT required? Why is it a good idea?

(1) Mandated by _____

(2) Allows _____ to collect any outstanding _____ owed to the Fed.

(3) If all payments were done via EFT, as an aggregate it would cost the Fed _____ money than using Non-EFT methods of payment.

WAIVER CONDITIONS

What if EFT won't work in your situation? There are several conditions that could apply to allow your vendor payment to be made non-EFT.

Condition	Waiver Use	Description	Approval Method	Record Keeping
Condition 1	Individuals and Sole Proprietorships; Federal Employees may NOT be waived	Used when EFT would impose a hardship due to either a physical or mental disability, or a geographical, language or literacy barrier, or would impose a financial hardship	Self-certified (approved) by the vendor at the Park level	Original kept at Park/Office for 3 years; however, waiver is only good for one year form signature date

Condition	Waiver Use	Description	Approval Method	Record Keeping
Condition 2	Foreign Vendor with an infrastructure that does not support EFT	The political, financial, or communication infrastructure in a foreign country does not support payment by EFT	Submitted to and approved by AOC/FST/TL	Original kept in office of AOC/FST/TL at AOC, Herndon, VA; good for one signature and may be used to pay more than one non-EFT method during this signature year to vendor waived
Condition 3	Vendor in support of a disaster area	Limited to 120 days. Where payment is within an area designated by the President or an authorized administrator as a disaster area.	Submitted to and approved by AOC/FST/TL	Original kept in office of AOC/FST/TL at AOC, Herndon, VA; good for one signature and may be used to pay more than one non-EFT method during a period not to exceed signature 120 days to vendor waived

Condition	Waiver Use	Description	Approval Method	Record Keeping
Condition 4	Vendor with work that is conducted for DoD operations	A response to contingency operations conducted by or in support of the Department of Defense	Submitted to and approved by AOC/FST/TL	Original kept in office of AOC/FST/TL at AOC, Herndon, VA; good for one signature and may be used to pay more than one non-EFT method during this signature year to vendor waived
Condition 5	Vendor of which national security or law enforcement activities may be compromised	Payment by EFT will pose a threat to national security, the life of an individual may be endangered, or a law enforcement action may be compromised	Submitted to and approved by AOC/FST/TL	Original kept in office of AOC/FST/TL at AOC, Herndon, VA; good for one signature and may be used to pay more than one non-EFT method during this signature year to vendor waived

Condition	Waiver Use	Description	Approval Method	Record Keeping
Condition 6	Vendor that will only invoice once per year	Agency does not expect to make more than one payment to the same vendor within a one-year period	Submitted to and approved by AOC/FST/TL	Original kept in office of AOC/FST/TL at AOC, Herndon, VA; good for one signature and may be used to pay ONLY one non-EFT method during this signature year to vendor waived
Condition 7	Vendors of urgency or of a sole source of a good or service	Agency's need for goods or services is of such unusual and compelling urgency that the Government would be seriously injured unless payment method is non-EFT; OR, there is only ONE source for goods or services and the Government would be seriously injured unless payment method is non-EFT	Submitted to and approved by AOC/FST/TL	Original kept in office of AOC/FST/TL at AOC, Herndon, VA; good for one signature and may be used to pay more than one non-EFT method during this signature year to vendor waived

**SELF-CERTIFICATION BY INDIVIDUAL OR SOLE PROPRIETORSHIP
(CONDITION 1)**

NOTES:

Scenario 1: Yosemite Sam volunteers at Yellowstone National Park. He incurs toll fees for running errands during the day for the Admin. Officer. He asks to be reimbursed for these costs, but tells you he does not have a checking account for the funds to be transferred via EFT.

1. Can this be waived under condition 1? If so, why? If not, why?
2. Who would have to approve this waiver request?
3. If approved, where should this waiver be kept, how long would it be good for, and for how long should it be kept before archiving?

Scenario 2: Fischer Towing, owned by Jeff Fischer, has towed one of your Park vehicles that must be fixed today or it will hinder further Park operations. He explains that he does not accept credit cards, nor is he set up to receive funds via EFT to his bank account.

1. Can this be waived under condition 1? If so, why? If not, why?
2. Who would have to approve this waiver request?
3. If approved, where should this waiver be kept, how long would it be good for, and for how long should it be kept before archiving?

CONDITIONS 2-5

NOTES:

Scenario 1: Florida is hit hard by a hurricane. The President declares the area a natural disaster area. Contracting officers are deployed to the area to start getting vendors to work on the clean up and rebuilding effort. Most individuals, including those who own many local businesses evacuated during the storm, are slowly returning to their residences. One park has much structural damage that must be cleared before any Park employees may safely return to work in some of the buildings.

1. Can vendors be waived under one of the conditions of 2 through 5 for this scenario of repairing structural damage? If so, what condition and why?
2. How long will the waiver be good for?
3. Who would approve the waiver?

Scenario 2: A national park on the border of Mexico has contracted with Northrup Grumman to support the National Guard deployed to secure the border and conduct operations. The park would like to waive the EFT requirement in order to pay Northrup Grumman in a timely manner.

1. Can EFT payment to Northrup Grumman be waived under any of the conditions 2 through 5 for this scenario? If so, what condition and why?
2. How long will the waiver be good for?
3. Who would have to approve this waiver?
4. Where would the waiver be kept for record?

CONDITIONS 6 AND 7

NOTES:

Scenario 1: Appomattox Court House NHP has a bond that they purchase from State Farm on an annual basis. They receive the invoice once a year in May. The Administrative Officer calls State Farm and explains to them the EFT policy. State Farm tells the AO that the park can either pay by check, credit card with a \$10 processing fee, or by EFT as long as it is paid on time, otherwise they will incur a 5 % late fee.

1. Can EFT payment to State Farm be waived under any of the conditions 6 or 7 for this scenario? If so, what condition and why?
2. How long will the waiver be good for?
3. Who would have to approve this waiver?
4. Where would the waiver be kept for record?

Scenario 2

Lincoln Birth Place receives sewage services from Hodgeville Water Works, which is a city-owned sewer service. They call to ask if they can pay in a way that would allow them to be in compliance with Treasury DCIA 1996 without using a waiver. However, the vendor tells Lincoln Birthplace they do not accept direct deposit, nor are they set up for credit cards. They are a small municipal and have not given thought to setting this up. They do however, accept checks.

1. Can EFT payment to Hodgeville Water Works be waived under any of the condition 6 or 7 for this scenario? If so, what condition and why?
2. How long will the waiver be good for?
3. Who would have to approve this waiver?
4. Where would the waiver be kept for record?

Scenario 3: Richard Rogers decides he no longer wants to camp at Shenandoah National Park after already paying the camp fee. You explain to Mr. Rogers that you cannot just write him a check to reimburse him the refund nor can you give him cash. You explain to him, he can be reimbursed by EFT to his bank account. He refuses to give you his bank account information. You explain that he could be reimbursed and sent a Treasury Check instead.

1. Can EFT payment to Mr. Rogers be waived under any of the conditions 6 or 7 for this scenario? If so, what condition and why?
2. How long will the waiver be good for?
3. Who would have to approve this waiver?
4. Where would the waiver be kept for record?

WAIVER REQUEST FORM

EFT Waiver Request Form

The Debt Collection Improvement Act of 1996 requires that all payments be made by electronic funds transfer (EFT) after January 1, 1999. Waivers to this requirement can be granted under the conditions described below. All requests for waiver must be documented. Use of this form will assist in the documentation process.

(Check the condition which applies and complete the information below, including a detailed explanation of the EFT waiver request. Additional explanations may be attached to this form, if necessary.)

Waiver Requests Made by an *Individual and Sole Proprietors* where use of EFT would impose a hardship.

- 1A. I do not have an account with a financial institution.
- 1B. Payment by electronic funds transfer would impose a hardship on me due to a physical or mental disability or a geographic, language, or literacy barrier, or would impose a financial hardship.

Only one condition should be selected.

Waiver Requests Invoking Natural Disasters, Public Safety or Foreign Payments.

- 2. The political, financial, or communications infrastructure in a foreign country does not support payment by EFT.
- 3. Payment to recipient within an area designated as a disaster area.
- 4. A response to contingency operations conducted by or in support of the Department of Defense.
- 5. Payment by EFT may pose a threat to national security, jeopardizes the life or physical safety of an individual, or compromise a law enforcement action.
- 6. The cost of using EFT for making a non-recurring payment is greater than the cost of making that payment by check. (Note: a non-recurring payment is defined as no more than one payment expected in a 12-month period to a particular payee.)
- 7. Public necessity suggests that payment by other (than EFT) methods is in the best interest of the government.

Vendor Name/TIN

Contact Name and Phone Number
This should be the Vendor Name and Phone Number

Explanation of Waiver Request (Explain in detail how this request meets one of the conditions described above.)

Approved _____
Disapproved _____

Date _____
Date _____

Include the Vendor Name that is reported on 1099 or tax return, and their Tax Identification Number. If TIN is a SSN, then only format as xxx-xx-####.

Approval is done either by the vendor if for condition 1A or 1B (self-certified) or by AOC/FST/TL only. No one else is allowed to certify as per the EFT Policy memo of August 19, 2010.

What AOC/FST/TL looks for in a waiver when the waiver is sent for approval:

- Only one condition selected
- Correct condition selected for the need of the waiver
- Vendor name and TIN on the form
- Vendor POC and contact number listed on the form
- Detailed reason explaining need for the waiver
- Explain or show that the requestor has researched other possible avenues of receiving the services or paying the vendor with an EFT method
- Approved and disapproved areas should NOT be signed

In the explanation area, state whether the vendor accepts a credit card or not. State if they will accept EFT as a method of payment. State how long the turnaround time is from the date the park receives the invoice to the date the bill is due. State the penalty of a late payment. State the fee of using an EFT method, if one at all. Demonstrate that you have sought an alternative method of receiving these services or goods. State if you checked CCR to see if the vendor is registered or not; or if you could have found another vendor who is registered that could provide the same services or goods.

Examples of a few disapproved by AOC/FST/TL:

One office submitted a waiver for a local police department. The police department would provide fingerprinting services for potential new NPS employees for that office at a very low cost, however at a cost. The police department would not accept credit cards or EFT transfers. They would only accept cash or checks. This was confirmed by AOC/FST/TL when research was conducted. However, further research by typing "Finger printing services....(location of the office)" into Google, found many that would accept charge cards as a form of payment. Maybe not as cheap, but would allow for compliance. Also, the search found that a local FBI office about a mile or so from the Park Office could also do this finger printing. After calling the FBI office, it was learned that not only would they be able to do this, but they also would not charge another federal agency for such a small amount of fingerprints per year.

Note from Fiscal Services Team Leader: Often I receive waivers requesting to be paid by a non-EFT method stating that the vendor does not accept a credit card. However, when I call the vendor, and verify that they do not accept credit cards, I find that the vendor does accept EFT payments via an ACH transfer. Research should be done prior to sending the waiver request. Exhaust all possible payment options before requesting a non-EFT method approval.

Jack's helpful hints:

- Before services or goods are rendered, during negotiations of these items, ask, "How can we pay you for these goods (or services)?" This is the time to work out if you need a waiver, or if you should consider researching to find a vendor that will allow you to pay them via an EFT method.
- Remember, the invoice can always be paid via Treasury check through AOC if the vendor does not accept EFT.
- Conduct research and consider alternatives to the "one" vendor you are considering if they will not assist you in complying.
- Use the National Park Service Payment Procedure Guide as your resource to paying via EFT.
- Know the CCR policy and who can get an exception to registering in CCR. Very limited exceptions. And all vendors are supposed to register unless they fall under one of these exceptions.

EXERCISE: HOW DID THEY DO?

We will now look at a few sample waiver requests – do they meet the criteria for a well-written submission? Answer the questions below for each:

1. Does this request meet all criteria for a well-written submission?
2. If so, why? If not, why not?
3. How would you change it, if at all?



Scenario 1:

EFT Waiver Request Form

The Debt Collection Improvement Act of 1996 requires that all payments be made by electronic funds transfer (EFT) after January 1, 1999. Waivers to this requirement can be granted under the conditions described below. All requests for waiver must be documented. Use of this form will assist in the documentation process.

(Check the condition which applies and complete the information below, including a detailed explanation of the EFT waiver request. Additional explanations may be attached to this form, if necessary.)

Waiver Requests Made by an *Individual and Sole Proprietors* where use of EFT would impose a hardship.

- 1A. I do not have an account with a financial institution.
- 1B. Payment by electronic funds transfer would impose a hardship on me due to a physical or mental disability or a geographic, language, or literacy barrier, or would impose a financial hardship.

Waiver Requests Invoking Natural Disasters, Public Safety or Foreign Payments.

2. The political, financial, or communications infrastructure in a foreign country does not support payment by EFT.
3. Payment to recipient within an area designated as a disaster area.
4. A response to contingency operations conducted by or in support of the Department of Defense.
5. Payment by EFT may pose a threat to national security, jeopardizes the life or physical safety of an individual, or compromise a law enforcement action.
6. The cost of using EFT for making a non-recurring payment is greater than the cost of making that payment by check. (Note: a non-recurring payment is defined as no more than one payment expected in a 12-month period to a particular payee.)
7. Public necessity suggests that payment by other (than EFT) methods is in the best interest of the government.

Vendor Name/TIN

DC Wood Creations SSN XXX-XX-2226

Contact Name and Phone Number

Dusty Coty 603-555-3499

Explanation of Waiver Request (Explain in detail how this request meets one of the conditions described above.)

Condition 6 applies to this vendor, DC wood creations. This agency does not expect to make more than one payment to this recipient within a one-year period.

Approved

Date

Disapproved

Date

Scenario 2:

EFT Waiver Request Form

The Debt Collection Improvement Act of 1996 requires that all payments be made by electronic funds transfer (EFT) after January 1, 1999. Waivers to this requirement can be granted under the conditions described below. All requests for waiver must be documented. Use of this form will assist in the documentation process.

(Check the condition which applies and complete the information below, including a detailed explanation of the EFT waiver request. Additional explanations may be attached to this form, if necessary.)

Waiver Requests Made by an *Individual and Sole Proprietors* where use of EFT would impose a hardship.

- 1A. I do not have an account with a financial institution.
- 1B. Payment by electronic funds transfer would impose a hardship on me due to a physical or mental disability or a geographic, language, or literacy barrier, or would impose a financial hardship.

Waiver Requests Invoking Natural Disasters, Public Safety or Foreign Payments.

- 2. The political, financial, or communications infrastructure in a foreign country does not support payment by EFT.
- 3. Payment to recipient within an area designated as a disaster area.
- 4. A response to contingency operations conducted by or in support of the Department of Defense.
- 5. Payment by EFT may pose a threat to national security, jeopardizes the life or physical safety of an individual, or compromise a law enforcement action.
- 6. The cost of using EFT for making a non-recurring payment is greater than the cost of making that payment by check. (Note: a non-recurring payment is defined as no more than one payment expected in a 12-month period to a particular payee.)
- 7. Public necessity suggests that payment by other (than EFT) methods is in the best interest of the government.

Vendor Name/TIN

Westar Energy 48029015#

Contact Name and Phone Number

Mari Beth McComb 620-555-0310

Explanation of Waiver Request (Explain in detail how this request meets one of the conditions described above.)

Less than 15 days to pay the utility bill after receipt.

Approved

Date

Disapproved

Date

Scenario 3:

EFT Waiver Request Form

The Debt Collection Improvement Act of 1996 requires that all payments be made by electronic funds transfer (EFT) after January 1, 1999. Waivers to this requirement can be granted under the conditions described below. All requests for waiver must be documented. Use of this form will assist in the documentation process.

(Check the condition which applies and complete the information below, including a detailed explanation of the EFT waiver request. Additional explanations may be attached to this form, if necessary.)

Waiver Requests Made by an Individual and Sole Proprietors where use of EFT would impose a hardship.

- 1A. I do not have an account with a financial institution.
- 1B. Payment by electronic funds transfer would impose a hardship on me due to a physical or mental disability or a geographic, language, or literacy barrier, or would impose a financial hardship.

Waiver Requests Invoking Natural Disasters, Public Safety or Foreign Payments.

- 2. The political, financial, or communications infrastructure in a foreign country does not support payment by EFT.
- 3. Payment to recipient within an area designated as a disaster area.
- 4. A response to contingency operations conducted by or in support of the Department of Defense.
- 5. Payment by EFT may pose a threat to national security, jeopardizes the life or physical safety of an individual, or compromise a law enforcement action.
- 6. The cost of using EFT for making a non-recurring payment is greater than the cost of making that payment by check. (Note: a non-recurring payment is defined as no more than one payment expected in a 12-month period to a particular payee.)
- 7. Public necessity suggests that payment by other (than EFT) methods is in the best interest of the government.

Vendor Name/TIN

Kansas Gas Service 73152092#

Contact Name and Phone Number

AO, Sue Zurybida 555-555-0310

Explanation of Waiver Request (Explain in detail how this request meets one of the conditions described above.)

Sole Source of service in this area. Less than 15 days to pay bill after the receipt of bill. Will not accept credit payments. Only accept EFT if done through automatic draft.

Approved

Date

Disapproved

Date

Scenario 4:

EFT Waiver Request Form

The Debt Collection Improvement Act of 1996 requires that all payments be made by electronic funds transfer (EFT) after January 1, 1999. Waivers to this requirement can be granted under the conditions described below. All requests for waiver must be documented. Use of this form will assist in the documentation process.

(Check the condition which applies and complete the information below, including a detailed explanation of the EFT waiver request. Additional explanations may be attached to this form, if necessary.)

Waiver Requests Made by an Individual and Sole Proprietors where use of EFT would impose a hardship.

- 1A. I do not have an account with a financial institution.
- 1B. Payment by electronic funds transfer would impose a hardship on me due to a physical or mental disability or a geographic, language, or literacy barrier, or would impose a financial hardship.

Waiver Requests Invoking Natural Disasters, Public Safety or Foreign Payments.

- 2. The political, financial, or communications infrastructure in a foreign country does not support payment by EFT.
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- 6. The cost of using EFT for making a non-recurring payment is greater than the cost of making that payment by check. (Note: a non-recurring payment is defined as no more than one payment expected in a 12-month period to a particular payee.)
- 7. Public necessity suggests that payment by other (than EFT) methods is in the best interest of the government.

Vendor Name/TIN

Stuart Skym SSN XXX-XX-5461

Contact Name and Phone Number

Stuart Skym 555-555-0310

Explanation of Waiver Request (Explain in detail how this request meets one of the conditions described above.)

Stuart Skym provided booth set up at for our annual Christmas fair. He claims to not have a bank account and cannot accept reimbursement by direct deposit.

Approved

Date

Disapproved

Date

EXERCISE: SUBMITTING A WAIVER REQUEST

Given a set of facts, develop a waiver request and complete a form. There is a blank form in your guide on page 26. You will be asked to complete either Scenario 1 or Scenario 2.



Scenario 1:

You want to request a waiver for a refund to John Smith. John Smith had planned a wedding at your park. Due to weather issues the wedding had to be canceled. John demands his money returned. You ask if he would accept us to send to his bank account and he tells you “there is no way I am giving you my bank information, just send me a check.” He is willing to give you his SSN for refund processing. His SSN ends with 1234. His phone number is 703-555-9161. With the given information, produce a generic waiver request.

Scenario 2:

You are told to do a waiver for a small business called “Wolf Stories” owned by John “Wolf” Doe. When you ask John for his 1099 information for the check, you notice he is a Sole Proprietorship and his TIN seems to be in the SSN format of XXX-XX-1234. You ask him if you could pay with a credit card. He responds with, we are a small, two-person operation with my wife and myself, I am not set up for credit cards. So you ask if he would allow us to pay his bank account directly. He response with, “And give BIG BROTHER my account information? If I had known this was such a hassle I never would have agreed to tell these stories.” You tell him no problem, a check is OK as long as there is an EFT waiver in place. You explain what the waiver is, and ask for a little more information to complete the waiver. You ask, what is your contact number? He responds with 703-555-1234. You ask if Wolf Stories is a sole proprietorship as per the 1099 information he gave you. He says “of course.” With the given information, produce a generic waiver request.

FREQUENTLY ASKED QUESTIONS

Q. When are the parks supposed to implement the August 19, 2010, Policy on Electronic Funds Transfer Payments Memo?

A. Immediately. That date signed is the date it became effective.

Q. Can we get a waiver to reimburse employees?

A. No. No employee, as per the Memo, can be reimbursed in any way other than via an EFT method.

Q. What alternative do we have to pay a vendor if they do not accept a credit card, will not give us information to process payment through AOC, and they do not meet any of the waiver conditions?

A. If you cannot get a waiver to use a non-EFT method of payment, and the vendor will not give you the banking information needed to process payment via EFT through AOC then currently an alternative method would be to use a convenience check. However, as with the credit card, there are rules that apply for convenience checks and these rules must be adhered to if using this method of payment.

Q. Who do we send reimbursement to at AOC to be paid via the EFT method?

A. When determining who is your park/office accounting technician at AOC, please refer to the AOC web site in the about AOC tab. Select the FST box in the organization tree. And then follow the below method:

If sending a reimbursement for an employee on a SF-1164, send to AOC/FST/Accounts Payable Attn: *Your Technician's Name*.

If sending a travel reimbursement on a SF-1012, send to AOC/FST/Travel Section Attn: *Your Technician's Name*.

If sending a reimbursement for Volunteers on a 10-67, send to AOC/FST/Accounts payable Attn: *Your Technician's Name*.

Q. How do I complete a waiver to be sent for approval?

A. Ensure it first meets a condition. On the AOC web site, in the documents tab and in the link for Fiscal Service, you will find a fillable Waiver form to use that can be saved to your computer. Select the condition that applies. Ensure that you complete the vendor and Tax Identification Number (TIN) information, the name of the vendor POC and phone number, and provide a detailed explanation as to why this waiver is needed and how it meets the condition chosen.

Q. Who do I send the waiver to for approval?

A. If the waiver is for an individual (not to include employees) and they are self-certifying using condition 1A or 1B, this is to be completed by the individual, and kept on site for audit purposes for at least 3 years. Waivers for 1A and 1B are not required to be sent to AOC for any reason. If the waiver is for condition 2 through 7, the waiver should be completed as per the instructions in the previous frequently asked questions, and then sent to AOC/FST Attn: FST Team Leader. Once received, it will be reviewed and either approved or disapproved. Either way a copy will be scanned and sent back to the original requester at the park/office.

Q. Is there an alternative to sending the waiver via mail?

A. Absolutely and the alternative is preferred. You can scan and email to jack_skym@nps.gov. You can complete a fillable form as and attach to an email to jack_skym@nps.gov. Or, you can fax to AOC at 703-487-9196, Attn: FST Team Leader. My favorite is to send via email. This method is usually clearer than via fax.

Q. How do I submit a waiver for a camping refund to a park visitor?

A. First submit the waiver, requesting to waive per condition 6 as per EFT memo. Once approved, send the SF-1034, Public Voucher for Purchases and Services Other Than Personal to AOC/AST, attaching the approved waiver with the voucher.

INTERRELATED POLICIES

Often the policies in the Federal Government intertwine with each other to make an entire product. For example, if you get a waiver for an Invitational Traveler to be paid via a non-EFT method of payment you still must adhere to the Federal Travel Regulations (FTR) in order to process the reimbursement of the traveler. In this case, two policies must coexist with each other in order to perform the travel as per federal regulations and policies. I will not go in depth on these policies; however, I would like to provide you the knowledge of guides, policies, and regulations that you should be familiar with when considering the payment of those who provide a service for the National Park Service.

- National Park Service Accounting Operations Center Payment Procedure Guide. A guide that is the combined efforts of both the Acquisition Community and the Accounts Payable Teams at AOC. This guide can be found on the AOC web site under the Documents tab. http://www.aoc.nps.gov/documents/fst_docs.html
- The Federal Travel Regulations. As per the GSA web site, “The FTR is the regulation contained in 41 Code of Federal Regulations (CFR), Chapters 300 through 304, that implements statutory requirements and Executive branch policies for travel by Federal civilian employees and others authorized to travel at Government expense.” This is the policy all Federal agencies must adhere to with respect to travel. This policy can be found at <http://gsa.gov/portal/content/104790>
- In addition to the FTR, the National Park Service has a Continuing Travel Improvements Memo, dated September 9, 2010, that can be found on the AOC web site under the documents tab. http://www.aoc.nps.gov/documents/fst_docs.html
- The most commonly asked about policy that pertains neck and neck with EFT is the Central Contractor Registration (CCR) policy. This policy is derived from and listed in the Federal Acquisition Regulation (FAR). A summary of the CCR policy can be found on the CCR web site. <https://www.bpn.gov/ccr/CCRPOL.aspx>

RESOURCES

As of April 2011, Fiscal Services Team Points of Contact:

- Debbie Townsend – Accounts Payable B – 703-487-9453
 - AKR
 - MWR
 - IMR (Portion previously SWR)
 - PWR (Portion previously WRO)
 - NER
- Phyllis Morris – Accounts Payable A – 703-487-9159
 - WAS
 - SER
 - DSC
 - IMR
 - HFC
 - PWR
- Angela Terry – Travel and Transportation B – 703-487-9338
 - AKR
 - DSC
 - IMR
 - NCR
 - PWR
- Timothy Bailey – Travel and Transportation A (Travel Liaison FBMS) – 703-487-9129
 - HFC
 - MWR
 - NER
 - SER
 - WAS
- Connie Gwynn – IPAC Payables – 703-487-9124
- Kevin Frye – Assistant Fiscal Services Team Lead (FST Liaison FBMS) – 703-487-9077
- Jack Skym – Fiscal Services Team Lead – 703-487-9161
- Web site: http://www.aoc.nps.gov/about%20us/about_fst.html

Guides and Policies:

- CCR - <https://www.bpn.gov/ccr/default.aspx>
- FTR - <http://gsa.gov/portal/content/104790>
- Fiscal Service Team Documents and most forms
http://www.aoc.nps.gov/documents/fst_docs.html
- EFT memo August 19, 2010 http://www.aoc.nps.gov/documents/fst_docs.html
- Fillable Waiver Request to be stored electronically and sent via email
http://www.aoc.nps.gov/documents/fst_docs.html
- NPS AOC Payment Procedure Guide http://www.aoc.nps.gov/documents/fst_docs.html
- Intra-Governmental Payment and Collections Procedures
http://www.aoc.nps.gov/documents/fst_docs.html
- Continuing Travel Process Improvements Memo September 9, 2010
http://www.aoc.nps.gov/documents/fst_docs.html
- More information on DCIA 1996 <http://www.fms.treas.gov/news/factsheets/dcia.html>

EFT Waiver Request Form

The Debt Collection Improvement Act of 1996 requires that all payments be made by electronic funds transfer (EFT) after January 1, 1999. Waivers to this requirement can be granted under the conditions described below. All requests for waiver must be documented. Use of this form will assist in the documentation process.

(Check the condition which applies and complete the information below, including a detailed explanation of the EFT waiver request. Additional explanations may be attached to this form, if necessary.)

Waiver Requests Made by an *Individual and Sole Proprietors* where use of EFT would impose a hardship.

- 1A. I do not have an account with a financial institution.
- 1B. Payment by electronic funds transfer would impose a hardship on me due to a physical or mental disability or a geographic, language, or literacy barrier, or would impose a financial hardship.

Waiver Requests Invoking Natural Disasters, Public Safety or Foreign Payments.

- 2. The political, financial, or communications infrastructure in a foreign country does not support payment by EFT.
- 3. Payment to recipient within an area designated as a disaster area.
- 4. A response to contingency operations conducted by or in support of the Department of Defense.
- 5. Payment by EFT may pose a threat to national security, jeopardizes the life or physical safety of an individual, or compromise a law enforcement action.
- 6. The cost of using EFT for making a non-recurring payment is greater than the cost of making that payment by check. (Note: a non-recurring payment is defined as no more than one payment expected in a 12-month period to a particular payee.)
- 7. Public necessity suggests that payment by other (than EFT) methods is in the best interest of the government.

Vendor Name/TIN

Contact Name and Phone Number

Explanation of Waiver Request (Explain in detail how this request meets one of the conditions described above.)

Approved

Date

Disapproved

Date

To Receive Credit for *How To Waive EFT – Let Me Count the Ways*

Take the **on-line evaluation** at: www.nps.gov/training/tel

- Click on the DOI Learn tab

Go to the link under Class Evaluations for *How to Waive EFT – Let Me Count the Ways*.

- Please complete the evaluation by **April 19, 2011**.

Also, sign the **Class Attendance Roster**.

Questions After the Course?

If at any time you have questions following this course, please refer to the Resources section of this guide for POCs and online resources.

Fiscal Services Plans to provide future training in this and other related areas, including:

- Travel and Transportation Temporary Duty Travel (TDY)**
- Travel and Transportation Permanent Change of Station Travel (PCS)**