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Fostering Change Management: Enhancing DoD Government-Wide Commercial Purchase Card Program's Compliance within Commander Naval Surface Force Pacific

June 2024

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Department of Defense Management

Naval Postgraduate School

Prepared for the Naval Postgraduate School, Monterey, CA 93943.

ACQUISITION RESEARCH PROGRAM
DEPARTMENT OF DEFENSE MANAGEMENT
NAVAL POSTGRADUATE SCHOOL

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ABSTRACT

The Government Commercial Purchase Card (GCPC) program is essential for efficient procurement within the Commander Naval Surface Force Pacific (CNSP). However, consistent noncompliance with GCPC policy among CNSP ships has led to disciplinary actions, including probation and suspension. This study aims to enhance compliance with the GCPC program across 74 vessels in CNSP. Using a mixed-method approach that combines database analysis and questionnaires from key participants, the research examines the program's structure, stakeholder roles, current policies, and recent changes to identify challenges causing noncompliance. The study found significant issues in shipboard operations, management and accountability, and policy and knowledge management. The research integrates these findings to set the stage for strategic recommendations, including improving infrastructure and operations, training and communication, and policy and process standardization. By applying popular change management models, the study suggests a seven-step change model tailored to the Navy operational context to reduce noncompliance within the CNSP GCPC program. This approach contributes to future research and policy development in procurement processes.

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LIST OF ACRONYMS AND ABBREVIATIONS

A/BO	Approving/Billing Official
A/OPC	Agency/Organizational Program Coordinator
AO	Approving Official
APC	Agency Program Coordinator
ATG	Afloat Training Group
ATGPAC	Afloat Training Group Pacific
CCP	Consolidated Card Program
CCPMD	Consolidated Card Program Management Division
CH	cardholder
CNAF	Commander of Naval Airforce Pacific
CNATRA	Commander of Naval Training Command
CNIC	Commander of Navy Installations Command
CNSG	Commander of Naval Surface Group
CNSP	Commander of Naval Surface Force Pacific
CO	Commanding Officer
COMNAVSURFOR	Commander of Naval Surface Force
COMPACFLT	Commander of Naval Pacific Fleet
CPM	central program manager
CS	culinary specialist
DAU	Defense Acquisition University
DCRs	Doctrine, Organization, Training, Materiel, Leadership and Education, Personnel, Facilities, and Policy Change Recommendations
DFARS	Defense Federal Acquisition Regulation Supplement
DOD	Department of Defense
DON	Department of the Navy
DOTMLPF-P	Doctrine, Organization, Training, Materiel, Leadership and Education, Personnel, Facilities, and Policy
EAS	electronic access systems
EFT	electronic funds transfer

EMRM	equipment maintenance related material
ERP	enterprise resource planning
FAR	Federal Acquisition Regulation
GAO	Government Accountability Office
GCPC	Government Commercial Purchase Card
GPC	government purchase card
GSA	General Services Administration
HL	hierarchy level
IOD	Insights on Demand
IOP	Internal Operating Procedure
JAM	Joint Appointment Module
KPI	key performance indicator
MNP	My Navy Portal
NAVFAC	Naval Facilities Engineering Systems Command
NAVSUP	Navy Supply System Command
NECC	Navy Expeditionary Combatant Command
NMCARS	Navy-Marine Corps Acquisition Regulation Supplement
OPR	open purchase request
OPTAR	operating target
OSD/DPC	Office of the Secretary of Defense/Defense Pricing and Contracting
PACFLT	Pacific Fleet
PACNORWEST	Pacific Northwest
PCAN	Purchase Card Administrative Notice
PCPN	Purchase Card Policy Notices
PIEE	Procurement Integrated Enterprise Environment
POAM	Plan of Action and Milestones
PRD	projected rotation date
SAHAR	Semi-Annual Head of Activity Review
SAP	simplified acquisition procedures
SAR	search and rescue
TWMS	Total Workforce Management Services
TYCOM	Type Commander

I. INTRODUCTION AND BACKGROUND

The Government Commercial Purchase Card (GCPC) program often goes unnoticed when running smoothly. However, any failures, such as noncompliance that leads to probation or suspension of the program, can significantly impact operations. In studying the GCPC program at Commander Naval Surface Force Pacific (CNSP), my objective is to enhance program compliance. Through my recommendations of change steps, I seek to refine the program's processes, striking a harmonious balance between the autonomy of purchasing and the essential reporting obligations, thereby ensuring smoother sailing for vessels under its purview.

This first chapter introduces the context and the research questions. The benefits of using purchase cards within the CNSP are explored, along with the efficacy of training procedures, including purchase card administrative notices (PCANs) for all relevant parties. Additionally, the root causes of noncompliance with established protocols for GCPC management on ships are investigated. This chapter contains:

- Context overview: Setting the stage for the problem.
- Research objectives: Defining what I aim to achieve.
- Research questions: Identifying specific inquiries.
- Significance of the study: Highlighting its importance.
- Scope and limitations: Outlining boundaries and constraints.

A. CONTEXT OVERVIEW: APPLICATION OF GCPC IN THE DEPARTMENT OF DEFENSE

When it was first introduced in 1989, the GCPC optimized the procurement and payment processes for smaller acquisitions, below the micro-purchase threshold. This program aimed to shorten acquisition timelines, trim down paperwork, lighten the administrative burden associated with acquiring goods and services, and eliminate the need for cash transactions (FAR 13.002, 2024). On the Department of Defense (DOD) level, it

was managed by the Office of the Under Secretary of Defense (Office of the Under Secretary of Defense [OUSD], 2020).

Within the DOD, the scale and impact of the GCPC program were particularly pronounced. The GCPC program was a cornerstone of efficiency across numerous agencies within the expansive U.S. government. With more than 350 participating agencies under its umbrella, the DOD collectively channeled close to $30 billion annually through the program, engaging in a staggering volume of more than 100 million transactions utilizing 3 million cards (Defense Acquisition University [DAU], n.d.a). This widespread adoption was thanks to its user-friendly interface and resemblance to personal credit or debit cards.

However, despite the GCPC's widespread adoption and apparent convenience, the DOD's decentralized structure necessitated that each organization maintain its own set of policies and procedures governing GCPC usage. These internal regulations covered everything from the types of purchases deemed permissible to the meticulous protocols for receipt of items and timely payment, ensuring compliance with CNSP GCPC policy and accountability across the board (OUSD, 2020).

B. APPLICATION OF GCPC IN THE DEPARTMENT OF THE NAVY AND COMMANDER NAVAL SURFACE FORCE PACIFIC FLEET

Under the Department of the Navy (DON), the CNSP fell under Commander Naval Pacific Fleet (COMPACFLT), encompassing approximately 74 surface vessels stationed strategically across San Diego, the Pacific Northwest, Hawaii, and Japan (Anonymous CNSP data analyst, interview with author, October 1, 2023). Within this expansive maritime domain, the use of the GCPC was paramount to supplement material availability provided to the Navy's logistic support. GCPCs simplified the procurement process, allowing authorized personnel on Navy ships to make micro threshold purchases quickly and efficiently, bypassing lengthy procurement procedures (FAR Part 13, 2024).

This streamlined acquisition process saved valuable time and resources, which was crucial in the dynamic and unpredictable environments in which Navy surface ships operated. In military contexts, especially during deployments or operations, quick decision-making and rapid acquisition of supplies and services were often imperative.

GCPCs enabled Navy ships to respond swiftly to unexpected requirements, ensuring mission readiness. They provided the flexibility to adapt to changing circumstances, enabling the acquisition of repair parts or emergency supplies and services without being hindered by rigid procurement processes (DAU, n.d.b). For instance, during the COVID-19 pandemic, GCPCs facilitated the rapid procurement of medical supplies, preventing the spread of the virus and demonstrating their crucial role in emergency response.

However, operational disparities arose due to the lack of uniform practices, and essential policy change notices (PCANs) from higher command, intended to guide and standardize GCPC utilization, were not consistently and effectively communicated to the diverse fleet locations, often leading to deviations from instructions and in extreme cases, suspension of a ship's GCPCs. As a result, by Quarter 2 of 2024, 23 out of 74 ships, which was approximately 31%, of the surface ships in the Pacific Fleet were on probation (Anonymous CNSP data analyst, email to author, December 18, 2023). See Table 1.

Table 1. Number of Ships on Probation by Location. Source: CNSP Database, December 2023

Location	Number of Ships on Probation	Number of Ships in the Region	Percentage on Probation
SAN DIEGO	15	42	36%
PACNORWEST	3	7	43%
HAWAII	3	8	38%
JAPAN	2	17	12%
TOTAL	23	74	31%

Addressing this existing problem demands a thorough examination of the current infrastructure, which has the potential to uncover invaluable insights. As a first step, I reviewed the structure of the GCPC program within CNSP to uncover underlying factors contributing to the issue and to pave the way for effective solutions.

1. CNSP GCPC Structure

A typical GCPC structure in the CNSP is shown in Figure 1.

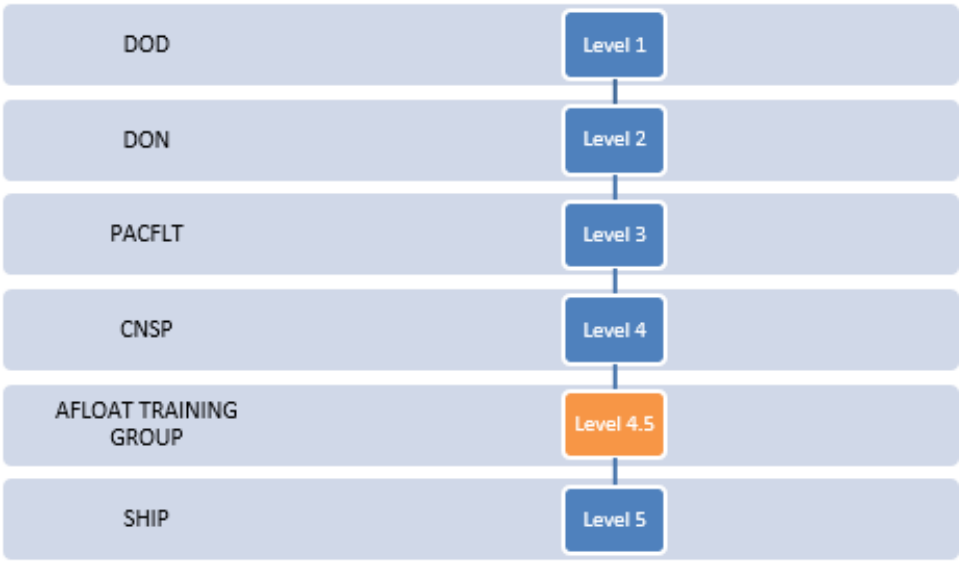


Figure 1. A Typical GCPC Program Structure

There are five hierarchy levels (HL) as follows:

At Level 1 (HL1), the DOD's Office of the Secretary of Defense, Defense Pricing and Contracting (OSD/DPC; also known as the Purchase Card Program Office) interprets and customizes federal statutory and regulatory laws and guidance for DOD usage (Department of the Air Force [DAF], 2022). For all DOD corporate card programs (including purchase, travel, air, fleet, and fuel) the DOD develops standardized business rules and documents them in the DOD Government Charge Card Guide for Establishing and Managing Purchase, Travel, and Fuel Card programs (DAF, 2022).

At Level 2 (HL2), the DON Consolidated Card Program Management Division (CCPMD) manages and supervises the Consolidated Card Program (CCP), which consolidates various payment card types like GCPCs, travel cards, and fleet cards within the organization. CCPMD oversees card issuance, develops usage policies, provides training, monitors transactions for compliance, conducts audits, collaborates with financial institutions, manages disputes and fraud investigations, and maintains program documentation and records, ensuring effective management and compliance (DAF, 2022). CCPMD issued NAVSUPINST 4200.99 series, Department of the Navy Government Purchase Card Policy (Commander, Naval Supply Systems Command [NAVSUP], 2024).

At Level 3 (HL3), Type Commanders, such as COMPACFLT, Commander of Naval Air Force (NAVAIR), Commander of Naval Special Warfare Command (NAVSPECWARCOM), Commander of Naval Installation Command (CNIC), and others, manage lower-level hierarchies within the organization. They provide training, establish communication channels, maintain program hierarchy, ensure understanding of duties among subordinate participants, act as liaisons to the DON central program manager (CPM), coordinate data call responses, stay informed about GCPC program policies, and exercise exclusive authority over internal controls within their hierarchy (Anonymous PACFLT data analyst, interview with author, November 7, 2023). See Table 2.

Table 2. Hierarchy Level 3 of GCPC. Source: PACFLT Database, November 2023

Command	Hierarchy Level 3
FSA	00011
SECNAV	00012
ONR	00014
ONI	00015
BUMED	00018
NAVAIR	00019
BUPERS	00022
NAVSUP	00023
NAVSEA	00024
NAVFAC	00025
HQUSMC	00027
DIRSSP	00030
COMSC	00033
NAVWAR	00039
NSMA	00041
CNIC	00052
USFFC	00060
MARCORSYSCOM	00067
COMPACFLT	00070
COMNAVRESFOR	00072
NAVSPECWARCOM	00074

Table 2 shows all Hierarchy Level 3 components of the GCPC program within the Department of the Navy, including COMPACFLT, which holds a smaller role in the broader context. The CNSP falls under COMPACFLT, guiding the focus of this research.

At Level 4 (HL4), the CNSP is responsible for establishing and maintaining the organizational and subordinate program hierarchy. The GCPC team at CNSP, consisting of five individuals, oversees 104 afloat GCPC programs and 34 shore commands (Anonymous CNSP data analyst, email to author, December 18, 2023). This team offers remote assistance to subordinates, the Agency Program Coordinator (A/OPCs), and other program participants, ensuring their comprehension and fulfillment of duties. Moreover, they are authorized to recommend probation or suspension of ships' GCPC programs in case of violations. CNSP issues COMNAVSURFPAC/COMNAVSURFLANT Instruction 4400.1A, known as CNSPLINST 4400.1 series, Surface Force Supply Procedures, and COMNAVSURFPAC/COMNAVSURFLANTINST 5040.1 (series), Supply Management Certification, which adopted GCPC guidance from NAVSUPINST 4200.99 series (Commander, Naval Surface Force U.S. Pacific Fleet, & Commander, Naval Surface Force U.S. Atlantic Fleet [CNSPL], 2016). These instructions have specific sections to guide ships in managing their GCPC Programs,

At Level 5 (HL5), the unit command level, typically represented by the ship, serves as the organizational entity responsible for executing purchases or transactions within a designated framework. It operates under the oversight of HL4 and is subjected to audit by ATG auditors as mentioned above. At this level, a typical structure includes various key roles: the head of activity (HA), who holds ultimate responsibility for managing the unit's procurement activities; the Agency/Organization Program Coordinators (A/OPCs), tasked with coordinating and overseeing the GCPC program at the activity level; the Approving/ Billing Officials (A/BOs), who is responsible for safeguarding against misuse and fraud within the government purchase card system; and the cardholders (CHs), individuals authorized to use the GCPC for procurement purposes within their designated authority. As of April 2024, there are 74 surface ship commands under CNSP, not including all decommissioning and newly commissioning ships (Anonymous CNSP data analyst, email to author, December 18, 2023).

Between Levels 4 and 5, there is one organization that holds an important role in the CNSP GCPC program: Afloat Training Group Pacific (ATGPAC). There are four afloat training groups (ATGs) under ATGPAC, including ATG Pacific Northwest in Everett, Washington; ATG San Diego in San Diego, California; ATG Mid-PAC in Hawaii; and ATG West Pacific in Yokosuka, Japan. These local ATGs have personnel who serve as auditors and trainers and are responsible for conducting mandatory quarterly audits of ships' GCPC binders within their region as per CNSP GCPC guidelines. Also, they provide training, whether remote or in person, for ships' personnel as required (CNSPL, 2016). While ATG organizations do not officially belong to a specific hierarchy level in the chain, I designate it as Level "4.5." The ATG serves as an intermediary level between Level 4 and Level 5, as outlined in Figure 1.

ATG GCPC audit covers various aspects, including the timely submission of GCPC binders, currency of training for all stakeholders, adequacy of documentation, unauthorized commitments, and sources of supplies, etc. Audits scoring below 80% validity are considered unsatisfactory, and late submission of GCPC binders is also considered unsatisfactory—in other words, that is "noncompliance." Noncompliance with CNSP GCPC policy can result in "Probation" status; if another noncompliance occurs during this period, the ship may face "Suspension" of its GCPC, halting purchasing activities until reinstatement. ATG then reports the score to CNSP's GCPC tracker. This CNSP GCPC Policy will be elaborated on in Chapter III.

2. Stakeholders

Since it started in 1989, the Navy's GCPC program has undergone substantial evolution, incorporated numerous changes, and expanded its participant base (Taylor, 2014). This expansion has drawn in multiple stakeholders from diverse entities, creating a complex network within the Navy GCPC program. I categorized these key entities into two groups: supporting entities and supported entities.

a. Supporting Entities

The supporting entities, consisting of multiple government and commercial agencies, play a crucial role in enhancing the utilization of the Navy's GCPC program.

They provide essential resources and services to program participants, offering platform training that addresses various aspects of GCPC management and compliance. Additionally, they supply reporting tools for streamlined tracking and monitoring of GCPC transactions, ensuring adherence to established protocols. Furthermore, they oversee the banking system associated with the GCPC program, including the issuance and management of physical cards, contributing to the program's efficiency and effectiveness.

(1) Training Providers

The Procurement Integrated Enterprise Environment (PIEE) serves as the mandatory enterprise tool for appointing and delegating purchase card procurement authority. It electronically retains supporting documentation and records all training certificates. All individuals participating in the GCPC program must document their roles in writing using the Joint Appointment Module (JAM) within the Procurement Integrated Enterprise Environment before assuming their responsibilities (Navy Supply System Command [NAVSUP], 2024b).

Training for this role is available from various sources, including links on Navy Supply System Command (NAVSUP) CCPMD, Defense Acquisition University (DAU), My Navy Portal (MNP), the General Services Administration (GSA), and Total Workforce Management Services (TWMS) websites.

- NAVSUP CCPMD: Training Files, available in audio or PDF format, offer specific guidance related to Navy GCPC management.
- DAU offers two required courses: CLG0010 – DOD Government-wide Commercial Purchase Card, which provides an overview of the Government-wide Commercial Purchase Card program; CLG006 – Certifying Officer Legislation Training for Purchase Card Payments, which focuses on the legal aspects related to certifying officer responsibilities for purchase card payments.
- MNP provides GCPC-related content courses through Navy e-learning.

- GSA offers web-based training modules covering various aspects of purchase card usage.
- TWMS includes relevant training modules related to GCPC management such as annual ethics training.

As part of the JAM role appointment process, program participants are required to go into these various sources to complete all of the training and upload the certificates to their PIEE profile (NAVSUP, 2024a).

(2) Banking Providers

Before November 2018, Citibank was the host banking platform for the Navy Government Commercial Purchase Card program (Naval Education and Training Command [CNATRA], 2017), but it was succeeded by U.S. Bank. While both banks had similar core functions, the transition to U.S. Bank brought significant changes in how vessels report GCPC transactions. This transition added extra steps and entities to the process. Now, as the card-issuing bank for the Navy under the GSA SmartPay3 contract and the Navy-specific task order, U.S. Bank has taken on more critical responsibilities related to GCPC services compared to Citibank. These responsibilities, outlined in NAVSUPINST 4200.99D, cover a wide range of functions including the following:

- Issuing GCPCs to authorized personnel.
- Managing merchant charges and credits.
- Resolving disputed charges.
- Processing invoice payments.
- Issuing monthly account statements.
- Providing electronic access systems (EAS) along with associated training and customer service.
- Assisting in account setup and maintenance for A/BOs and A/OPCs.
- Monitoring for external fraud.
- Distributing rebates to the DON based on GCPC utilization and prompt payment records. (NAVSUP, 2024a)

These aforementioned functions impose another set of process and protocol requirements that ship personnel must adhere to.

(3) Automatic Auditing Tool Providers

Another platform utilized to manage the GCPC program is the Insights on Demand (IOD) audit tool. The IOD is a sophisticated artificial intelligence platform designed for data mining, which autonomously scrutinizes the DOD GPC data to pinpoint transactions with elevated risk levels. By leveraging the IOD, the Department can meet the mandate outlined in 10 U.S.C. §2784 (as amended by Public Law 112194, the Government Charge Card Abuse Prevention Act of 2012), which stipulates the utilization of effective systems, techniques, and technologies to prevent or detect improper purchases. Moreover, the IOD streamlines transaction assessments, facilitating the documentation of detected issues and the implementation of corrective measures (Department of the Air Force, 2022).

However, PIEE and IOD do not communicate with each other. An example of this disconnect was evident in the Semi-Annual Head of Activity Report (SAHAR). Despite the expiration dates of training certificates being tracked by the JAM module on PIEE, the Data Mining Report extracted from IOD still require manual input of the number of HAs, A/OPCs, A/BOs, and CHs who have not undergone training, along with reasons for their lack of training. Additionally, the SAHAR Line 21–26 is automatically generated as blank. NAVSUP has manual correction instructions on how to correct this problem (See Appendix A).

b. Supported Entities

As mentioned in the preceding section, HL5, the unit command, or the ships in this context, are responsible for initiating purchase requests, executing purchases, reconciling documentation into the GCPC binder, and submitting this binder to the ATG for quarterly review. Monthly and semi-annually, they must generate reports for IOD.

The breakdown structure of Level 5 is outlined in Figure 2.

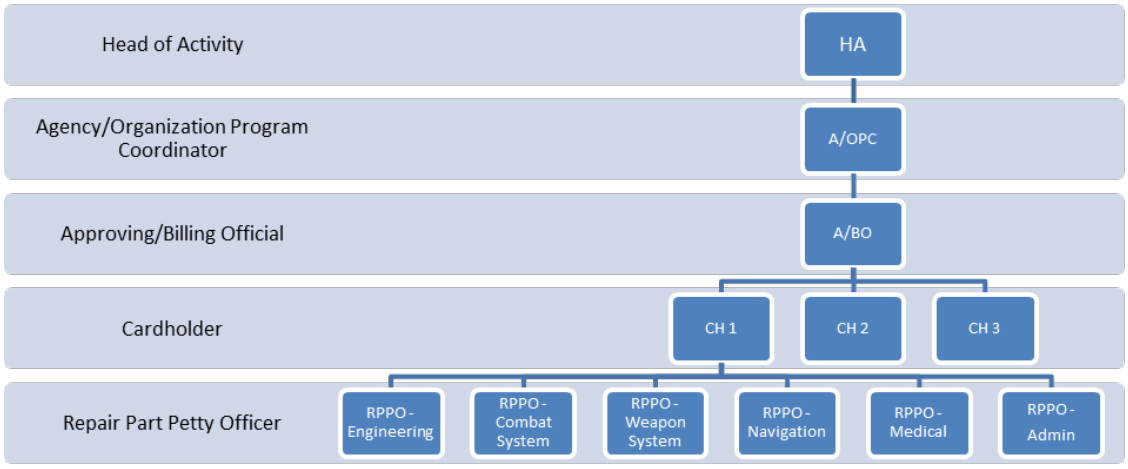


Figure 2. GCPC Structure on Level 5, CNSP Ships

The HA oversees the GCPC program within their command, with the authority to delegate tasks to qualified individuals. Responsibilities include appointing personnel, ensuring separation of duties, maintaining a command climate to prevent undue influence, implementing controls, approving procedures, conducting investigations, overseeing training, performing reviews, enforcing disciplinary actions, and integrating card responsibilities into performance standards (NAVSUP, 2024a).

A/OPCs at Level 5 manage the GCPC program at the activity level, collaborating with the HA to establish procedures and conduct training. Duties include maintaining hierarchy, training participants, liaising with the issuing bank, overseeing performance, implementing controls, conducting reviews, monitoring for misuse, adjusting limits, staying informed, coordinating with experts, and ensuring proper documentation (NAVSUP, 2024a). On board a Navy ship, the A/OPC role is assigned to the Supply Officer.

A/BOs play a crucial role in preventing abuse and fraud in the GPC system. They review and approve statements, validate documentation, sign account statements, report improper purchases, track transactions, ensure compliance, address questionable purchases, close accounts, report reassignments or departures, report lost or stolen cards,

and recommend measures to minimize misuse risks (NAVSUP, 2024a). Onboard Navy ships A/BO role is assigned to the Logistics Specialist Chief in the Supply Department.

CHs use the GPC to procure authorized supplies and services within their authority, adhering to various requirements. Responsibilities include purchasing ethically, ensuring funds availability, observing limits, sourcing from mandatory sources, timing transactions appropriately, managing shipments, maintaining logs and receipts, reconciling statements, resolving disputes, safeguarding against theft, securing card information, reporting loss or theft, and seeking guidance when uncertain about a purchase's legitimacy (NAVSUP, 2024a). On board Navy ships, the CH role is assigned to the Logistics Specialist Petty Officer in the Supply Department.

On Navy ships, Repair Part Petty Officers (RPPOs) are collateral duties that are not primary duties, often held by Petty Officers or, at times, Seamen who work in various departments such as Engineering, Combat Systems, and Weapons Systems, as illustrated in Figure 2. Their responsibilities include initiating Open Purchase Requests (OPRs) and forwarding them to the Supply Department for execution. This role is indispensable to the GCPC process, as RPPOs handle crucial tasks such as generating OPRs, generating OPRs, collecting vendors' quotes, and fulfilling all required documentation.

In January 2024, HL5 alone comprised approximately 2,300 participants, with around 1,500 CHs, 300 A/OPCs, and 500 A/BOs (Anonymous, HL3 A/OPC, interview with author, November 1, 2023). The program's expansive participant base and adaptable development approach present challenges, including the continuous need to update participants' knowledge and ensure alignment with standardized practices, such as training, document submission, and audit compliance. Maintaining coherence among all participants is crucial for addressing noncompliance and upholding uniformity within the program, as it fosters consistency and alignment in actions, interpretations, and adherence to policies and procedures. Especially, given the dynamic nature of military organizations and their frequent personnel turnover, providing continuous training for new program entrants is essential. Keeping these individuals updated on policies is crucial for seamless integration and adherence to program standards.

Next, I looked into the current policy that controls the GCPC Program in CNSP.

C. CURRENT POLICY

The foundational policies of the GCPC, a method of government procurement, are governed by the Federal Acquisition Regulation (FAR), Defense Federal Acquisition Regulation Supplement (DFARS), and Navy-Marine Corps Acquisition Regulation Supplement (NMCARS). Together, these regulations provide the regulatory framework for government procurement, including the utilization of government purchase cards. They establish rules, procedures, and limitations that govern the acquisition process, ensuring transparency, accountability, and compliance with applicable laws and policies.

The FAR serves as the primary set of rules and guidelines for federal government acquisition and contracting. It includes regulations about the use of government purchase cards, such as requirements for obtaining and utilizing GCPCs, limitations on their usage, and procedures for reconciling and documenting transactions. FAR Subpart 13.301 specifically addresses the use of purchase cards for simplified acquisitions.

The DFARS supplements the FAR with additional regulations and guidance tailored to the DOD acquisition process. It provides more detailed requirements and procedures for DOD acquisitions, including the use of government purchase cards within the defense procurement system.

NMCARS further supplements the FAR and DFARS by providing additional regulations and guidance specific to acquisitions within the Navy and Marine Corps. NMCARS includes specific provisions related to the use of government purchase cards for Navy and Marine Corps acquisition, customized to the unique needs and requirements of these military branches.

While the FAR, DFARS, and NMCARS provide overarching guidelines, three pivotal policies govern the GCPC within ship programs: the NAVSUPINST 4200.99 series, CNSPLINST 4400 series, and the Ship's GCPC Internal Operating Procedure (IOP).

1. NAVSUPINST 4200.99 Series

At Level 2, NAVY Supply System Command (NAVSUP) oversees the primary GCPC instruction, the NAVSUPINST 4200.99 series, which provides overarching policies granting commanders flexibility in developing operational procedures aligned with their mission, provided they comply with regulations and DOD and DON policies. The NAVSUPINST 4200.99 series is associated with PCAN and purchase card policy notices (PCPN). While PCPNs address policy updates to the NAVSUPINST 4200.99 series, PCANs address administrative updates such as deadlines and program notices, e.g., Semi-Annual Head Activity Review (SAHAR) deadlines and Fiscal Year (FY) Line of Accounting (LOA) rollover instructions (See Appendix B).

NAVSUPINST 4200.99C, issued on November 23, 2015, was updated nine years later to 4200.99D on February 9, 2024. Between those two versions, multiple PCANs and PCPNs were added to the program. For example, in the first six months of FY2024, two PCPNs and six PCANs were added. However, no prior instructions or guidance notices were deleted. Table 3 illustrates the list of PCPNs and PCANs that were added in FY2024.

Table 3. List of PCANs and PCPNs from October 2023 to April 2024

Notice number	Release Date	Title
PCPN #02D	March 4, 2024	- [no title given]
PCPN #01D	February 15, 2024	- [no title given]
PCAN FY24 #01	October 24, 2023	GPC Participation in the GSA Commercial Platforms Program
PCAN FY24 #02	November 19, 2023	GPC Appointment Authority
PCAN FY24 #03	January 3, 2024	UPDATED Required Training Update
PCAN FY24 #04	December 19, 2023	Covered Applications Added to Prohibited Purchase List
PCAN FY24 #05	April 3, 2024	1st Half-FY24 Semi-annual Review (SAR)
PCAN FY24 #06	April 9, 2024	Federal Prison Industries Updated Significant Market Share

The PCANs and PCPNs are accessible on the CCPMD website and distributed to the fleet through emails sent by the CNSP data analyst to Ship A/OPCs and A/BOs. It is mandatory for all participants to thoroughly read these documents and emails and acknowledge receipt for inspection and audit purposes. However, the frequent updates are often conveyed in lengthy emails that include steps and attachments, sometimes followed by clarification emails. These emails must compete with other urgent emails in the shipboard environment, raising uncertainty about whether they are fully read, understood, and properly applied. Figure 3 shows a lengthy, complex email with action steps; Figure 4 shows a clarification email sent three days later.

Subject: FW: PCAN FY24 #05 - 1st Half-FY24 Semi-annual Review (SAR) (Released 3 April 2024) DUE NLT 17 MAY 2024

SURFPAC GCPC AOPCs,

Please read the below information regarding the Semi-Annual Review process.

BLUF: To provide policy deadline of the Semi-Annual Review process. login to US Bank via PIEE SSO and submit the required 2 SAR deliverables (SAR Checklist Template.docx and Semi-Annual HA Review report (SAHAR) within the Insights On Demand website **NLT 17 May 2024.**

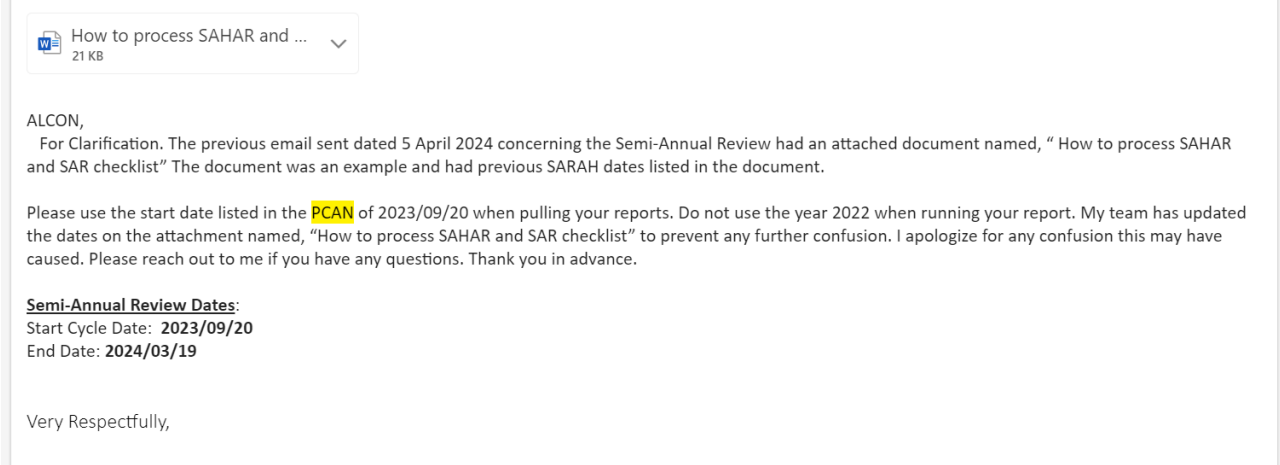
BACKGROUND: NAVSUPINST 4200.99 series, The DON GCPC semiannual review is required to ensure adherence to internal controls and ensure the HA is involved in each activity's GCPC Program. The semiannual review is performed by the HL5 A/OPC using the approved DON audit tool and is an aggregate of the activity's monthly reviews for the past six months. Results are briefed to the HA and then reported to the A/OPC at the hierarchy level directly above their activity. **Failure to complete certification NLT 17 May 2024 will result in immediate account suspension.**

POLICY: PCAN FY24 #05 provides guidelines to successfully process FY24 First half Semiannual reviews from October 2023 to March 2024 billing cycle.

ACTION:

1. Acknowledge receipt of understanding actions required to complete 1st half- FY24 Semi-Annual Review (SAR) to the CNSP POCs listed below.
2. The HL5 A/OPCs must complete the 1st Half-FY24 Semi-Annual Review required deliverables outlined in PCAN FY24 #05 no later than **17 MAY 2024;** (download and review SAR for accuracy , brief HA and HA must sign SAR than upload in IOD message tab) .
3. Refer to PACFLT PCAN FY24 #05 and the document labeled, "How to process SAHAR and SAR checklist" for actions (documents attached).
4. Contact LVL 4 A/OPC for assistance if required.
5. **ALL Deliverables due NLT 17 May 2024**.

Figure 3. A Typical PCAN Notice Sent Friday, April 5, 2024, 8:06 AM


How to process SAHAR and ...
21 KB

ALCON,
For Clarification. The previous email sent dated 5 April 2024 concerning the Semi-Annual Review had an attached document named, " How to process SAHAR and SAR checklist" The document was an example and had previous SARAH dates listed in the document.

Please use the start date listed in the PCAN of 2023/09/20 when pulling your reports. Do not use the year 2022 when running your report. My team has updated the dates on the attachment named, "How to process SAHAR and SAR checklist" to prevent any further confusion. I apologize for any confusion this may have caused. Please reach out to me if you have any questions. Thank you in advance.

Semi-Annual Review Dates:
Start Cycle Date: **2023/09/20**
End Date: **2024/03/19**

Very Respectfully,

Figure 4. Clarification for an Email Notice Sent Monday, April 8, 2024, 3:17 PM (Three Days Later)

The dynamic nature of the Navy GCPC program underscores the crucial need for effective communication to ensure that changes are comprehensively disseminated among multiple stakeholders. Ensuring that stakeholders not only receive the message but also understand and correctly implement the changes presents a significant challenge. Revising the process necessitates clear and concise communication strategies, robust training programs, and ongoing support mechanisms to facilitate seamless adaptation to evolving program requirements.

2. SURFORCEINST 4400 Series

At Level 4, CNSP aligned with the 4200.99 series and developed the SURFORCEINST 4400.1 series for surface ships. Section 2302 of this instruction describes the guidance on how to manage the GCPC program on surface vessels (Naval Surface Forces, 2008). The other commands, including the Commander of Naval Air Forces Pacific (CNAP), Commander of Naval Training Command (CNATRA), and Commander of Navy Installation Command (CNIC), Navy Expeditionary Combatant Command (NECC), developed their own GCPC instructions tailored to their platforms.

3. Unit Command Level GCPC IOP

At Level 5, each ship is required to develop its own activity-specific IOP covering nomination, appointment, and replacement of program participants, purchase processing, recordkeeping, receipt and acceptance of supplies, property management notifications, invoice verification, disciplinary actions, and account closure procedures, ensuring compliance and facilitating efficient GCPC operations (NAVSUP, 2024a).

In summary, the proliferation of instructions across various levels, each necessitating similar content and frequent updates, introduce inefficiencies and bureaucratic hurdles within the program. The ongoing process of updating SURFORCEINST 4400.1A to align with the evolving NAVSUP 4200.99 series exemplifies this challenge. Once these two series get updates, multiple ship GCPC IOPs are required to be updated too. The amount of effort can become substantial. Therefore, streamlining and consolidating these instructions could mitigate redundancies and enhance the program's efficiency and adaptability to regulatory changes.

D. GCPC COMPLIANCE ISSUE WITHIN CNSP

Over a considerable period, CNSP has encountered challenges with noncompliance concerning GCPC within its fleet. Ships are mandated to submit their GCPC binder to the local ATG (Level 4.5) for quarterly auditing before the deadline. The ATG auditor evaluates the GCPC binder, which contains documentation of all GCPC purchases during the cycle, assigns a grade, and reports the score to Level 4. Achieving a passing score of 80% is crucial for audit success. However, the issue arises when multiple ships either fail to submit their GCPC binder on time or receive a failing grade during the audit process.

CNSP's GCPC policy includes stringent measures to ensure compliance (Anonymous HL4 HA, email to author, October 1, 2023):

- ATG audits had to be completed within 14 days after the quarter's end, with exemptions for deployments and significant underway operations.
- Failure to submit quarterly GCPC binders within 14 days resulted in a score of "0."

- Two consecutive quarters of scoring zeros led to program suspension, reinstated only through Level 4 CNSP action with ATG recommendation.
- Two consecutive quarterly failures (below 80%) resulted in probation for 4 quarters. Units had 21 days to submit corrections to ATG, with failure resulting in automatic program suspension.
- Any failures during probation led to an automatic suspension and necessitated training by CNSP and ATG staff.
- Units with two consecutive failing re-audit scores faced automatic suspension, requiring reactivation through Plan of Action and Milestone (POAM) submission and audit review by CNSP A/OPC or HL4 A/OPC. (Anonymous HL4 HA, email to author, October 1, 2023)

In the second quarter of FY2023, 31% of ships found themselves on probation (Anonymous CNSP data analyst, email to author, December 12, 2023). Despite concerted efforts to overhaul the program, such as the introduction of standard purchase forms, enforcement of disciplinary measures, and augmentation of personnel numbers, progress was not achieved. "As of March 2024, CNSP managed 144 GCPC programs, with 108 commands operating afloat and 36 commands ashore. Among these, 24 commands were on probation, and one command was under suspension, resulting in a 23% probation/ suspension rate" (Anonymous HL4 HA, email to author, March 5, 2024). From 2023 to 2024, the probation rate showed improvement; however, ongoing challenges highlight the need for further enhancements.

This probation trend was commonly observed among ships undergoing home port changes between different regions. Table 4 illustrates three recent ships placed on probation, along with the reasons.

Table 4. Examples of Ships on Probation

Ship	Home Port Shift	Probation Reason	Audit Details
A	April 23 (WP to PNW)	Failing two GCPC audits in 12 months	FY23 Quarter 1 (00.00%), FY23 Quarter 2 (58.00%)
B	August 23 (PNW to SD)	Failing two GCPC audits in 12 months	FY22 Quarter 4 (59.00%), FY23 Quarter 1 (69.00%)
C	October 23 (PNW to SD)	Failing two GCPC audits in 12 months	FY22 Quarter 4 (68.00%), FY23 Quarter 1 (62.00%)

Although these standards were well-communicated to the ships, compliance issues persist. Such violations could have cascading effects, undermining procurement efficiency and overall operational readiness of Navy surface vessels. Addressing this challenge is urgent, as it compromises the very purpose of GCPCs—to streamline and efficiently acquire goods and services. This escalating concern demands immediate attention, which this research hopes to initiate.

E. CHANGES IN THE CNSP GCPC PROGRAM

Since its inception in 1989, the evolution of the GCPC program has involved continuous updates and refinement in both instruction and process.

1. Changes in Instruction

First, the NAVSUPINST 4200.99 series, issued by the Naval Supply Systems Command Directives (Level 2), serves as the primary guidance for the Navy's GCPC program. These instructions cover procurement regulations, the responsibilities of CHs and approving officials, spending limits, reporting procedures, and compliance with relevant laws and regulations. The series undergoes periodic revisions to ensure efficient program management. The latest iteration, NAVSUPINST 4200.99D, issued on February 9, 2024, supersedes its predecessor, NAVSUPINST 4200.99C, dated November 23, 2015. Additionally, multiple PCANs are introduced between updates, and disseminated for review and acknowledgment by all program participants. At the unit level (Level 5), Internal Operating Procedures must be annually updated to incorporate new policies or adjustments, synchronized with the relief of the HA.

Within the CNSP, Level 4 has incorporated updates from the NAVSUPINST 4200.99 series and PCANs into their guidelines outlined in the CNSPLINST 4400 series. Although the most recent version, CNSPLINST 4400.1A, was issued on February 17, 2016 (approximately 8 years ago), the new iteration, CNSPLINST 4400.1B, is currently under development as of February 2024. The recent introduction of the Navy Flank Speed platform in June 2021 has further enhanced CNSP's management of the GCPC program by consolidating all resources under one SharePoint CNSP N4 website, facilitating easy access for all participants seeking information (Flank Speed – Navy's Transition to

Improved Microsoft 365 Cloud Collaboration, n.d.). The technology innovation underscores a dedicated commitment to staying current with evolving regulations and best practices.

Despite implementing proactive measures such as issuing directives, implementing policies, and raising fleet awareness, the CNSP has encountered persistent challenges in their change management efforts, resulting in limited success. The percentage of ships scoring below 80% in GCPC audits remains at approximately 30% of the total ship count every quarter (data from CNSP, see Chapter III). The dynamic military environment, marked by frequent personnel rotations, poses significant obstacles to adaptation. As a result, there is always a growing need for continuous investment in training to effectively implement new policies and uphold operational excellence during organizational transitions.

Despite efforts to update and streamline the process, there is a noticeable absence of centralized policy or guidelines governing Level 5 reporting, including ATG and Level 4. Moreover, there is a lack of policy for Level 4 to effectively manage Level 5 operations as well as guidance for how Level 5 is supposed to report to Level 4. Additionally, insufficient consideration has been given to the unique challenges posed by the shipboard environment, such as deployment, shifting home port, mobility, connectivity, and expeditionary operations.

In summary, while the 4200.99 and 4400.1 series remain the primary guidance for GCPC in Navy commands, updates have been sluggish. The rapid changes in processes, particularly the switch in the banking system mentioned earlier, have significantly affected reporting procedures. This combination of factors underscores the need for clearer instructions and thorough research to ensure smooth adaptation, especially given the unique shipboard environment.

2. Changes in Process

Since U.S. Bank took over Citibank in 2018 as the GCPC card-issuing bank, there has been a significant transformation in the process of reporting GCPC transactions. The PIEE now serves as the central interface, consolidating all connections to the U.S. Bank

and IOD. However, despite these substantial changes, there is a noticeable lack of studies or instructions that explore these modifications (see Chapter II). Notably, until April 2024, seven years after the program's inception, there was a notification email from the CNSP data analyst providing the U.S. Bank Help Desk number to the ship (see Appendix C). This seven-year delay in providing such basic information is a good example of the minimal management in communication with the program users. This absence of guidance or research hinders a comprehensive understanding and effective management of the new reporting process, potentially leading to inefficiencies or misunderstandings among stakeholders.

3. Changes in CNSP Policy

While the criteria for compliance have remained consistent throughout the year, shifts in leadership at CNSP have led to varying perceptions regarding the seriousness of GCPC compliance. To address compliance issues, CNSP has recently taken steps such as sending reminder or warning emails to ships' A/OPCs and A/BOs. Notably, in 2023 alone, there were 26 emails from the CNSP data analysts and CNSP HL4 HA sent to all of the ships within CNSP, which was about two notices per month (Anonymous CNSP data analyst & CNSP HL4 HA, email to author, 2023).

In October 2022, CNSP, via ATG, issued a standardized Open Purchase request form applicable to ships in all regions, showcasing CNSP's efforts to combat compliance problems. However, despite these initiatives, the change in CNSP policy toward GCPC has not yielded substantial results, as evidenced by the fluctuating average audit scores of ships in 2022 and 2023, as mentioned in Chapter IV. These fluctuations raise questions about the effectiveness of the measures CNSP has applied to its GCPC program.

F. RESEARCH OBJECTIVES

This research aims to address the critical need for compliance with the GCPC program within the CNSP. By examining the sustainability of the GCPC program in the Navy environment through the lens of change management, this research aims to foster a proactive shift in GCPC management, improving compliance of ships' GCPC program with CNSP policy. Ultimately, the objective is to cultivate an environment conducive to

the long-term success of the GCPC program within the Navy's maritime operations, ensuring its effectiveness and efficiency in meeting procurement needs while upholding regulations and best practices.

My exploration revolved around two central inquiries:

- **Compliance with the CNSP GCPC Program**: I evaluated the ship's GCPC Program compliance by examining the effectiveness of current management strategies. Through this analysis, I identified challenges encountered in managing the GCPC Program within CNSP.

- **Change Steps that can be applied to improve the compliance level**: I endeavored to understand the specific type of change that is required within the CNSP GCPC Program. By identifying the change's nature and scope, I suggested ways to address its challenges effectively. I then utilized a Change model to tailor change initiatives to align with the program's unique characteristics. I aimed to facilitate successful change by offering targeted recommendations informed by best practices and empirical evidence, maximizing desired outcomes.

G. RESEARCH QUESTIONS

This research aimed to investigate what steps could be taken to improve compliance in the GCPC program for ships within the CNSP. In addition to addressing the primary research question, this study delves into secondary research questions that seek to identify the main challenges to compliance associated with the GCPC program within the CNSP and propose potential improvements to enhance its performance. By exploring these questions, this research aims to provide valuable insights into the factors influencing compliance with the GCPC program and offers practical recommendations for mitigating noncompliance issues. Through a comprehensive examination of these issues, this study aims to contribute to the development of effective strategies for managing the GCPC program within the CNSP and improving its overall effectiveness and efficiency.

(1) Primary Research Question

- What steps can be taken to improve compliance in the GCPC program for ships within the CNSP?

(2) Secondary Research Questions

- What are the main challenges associated with the GCPC program within the CNSP?
- What potential improvements can be proposed to address identified challenges and enhance the CNSP GCPC program's performance?

H. SIGNIFICANCE OF THE STUDY

Fixing compliance issues within the GCPC program would hold immense benefits for Pacific Force ships. Rectifying compliance issues aids in cost savings by avoiding administrative penalties. Embracing GCPC program guidelines fosters a culture of accountability within Pacific Fleet Force ships, promoting transparency and reducing the risk of misuse or fraud. Compliance also ensures operational readiness by guaranteeing access to essential resources, mitigating supply chain disruptions, and enhancing the ships' capability to fulfill missions effectively. Addressing compliance issues further mitigates regulatory risks and legal ramifications, safeguarding the ship's reputation and minimizing adverse consequences for the command. Ultimately, effort towards compliance enhances operational efficiency, effectiveness, and responsibility, bolstering overall mission success and operational effectiveness for the Pacific Fleet Force.

I. RESEARCH SCOPE

The research focused on the CNSP and its GCPC program. The target population for this study comprised 74 surface vessels within the Pacific Fleet (PACFLT), not including newly commissioned and decommissioned vessels. The research aimed to encompass a representative sample of this population, providing insights into the challenges and opportunities the GCPC program faces across diverse maritime contexts.

To achieve a balanced representation, qualitative interviews were conducted on a selected sample of 10 ships within the CNSP, which was approximately 10% of the population. These ships were chosen to ensure that a diverse representation of vessel types, geographical locations, and operational contexts was captured, enabling a comprehensive understanding of the GCPC program's implementation challenges. I considered a 10% sample size because it was impractical or impossible to study an entire population due to logistical constraints including geographical dispersion or accessibility issues. By selecting a 10% sample, I could reduce costs significantly while still obtaining a representative subset of the population.

J. SUMMARY

This chapter lays the groundwork for understanding the pressing issues surrounding the GCPC program within the CNSP. It highlights the challenges of balancing convenience with compliance, emphasizing the importance of standardization and effective communication in ensuring the program's success. The chapter provides an overview of the GCPC program's significance in streamlining procurement processes and enhancing operational readiness within the expansive maritime domain of the Pacific Fleet. It identifies the escalating concerns regarding GCPC violations and the potential ramifications for mission success. The research purpose is outlined, aiming to establish a framework for addressing compliance challenges through communication and change management strategies. The chapter concludes by introducing the research questions, highlighting the need for a comprehensive examination of GCPC utilization and compliance issues within CNSP.

II. LITERATURE REVIEW

In this chapter, I examine the literature concerning the GCPC Program and Change Management within the military, with a focus on the maritime environment. I then navigate through the complexities of change management theory to choose a framework that resonates with the unique intricacies of the GCPC program within CNSP. My primary objective is to enhance the existing understanding of leadership and organizational change within the Navy, with an emphasis on the GCPC domain, to contribute to the scholarly discourse on leadership and organizational change and provide actionable insights tailored to the GCPC.

A. REVIEW OF GCPC AND CHANGE MANAGEMENT LITERATURE

This section is divided into two parts: GCPC Management and Change Management.

1. GCPC Management

Numerous analyses of the DOD and Navy spending habits concerning the GCPC have been conducted. These analyses draw from reports by the Executive Branch Inspector General, Legislative Branch General Accounting Office (GAO) Audits, and peer-reviewed journal articles. However, these reports tend to focus on instances of misuse or abuse of the card, particularly highlighting prohibited purchases, but they do not talk about the management of GCPC. Three key articles—"Is That Purchase Authorized?: How the Department of Defense Should Amend Its Government Purchase Card Program to Proactively Prevent Improper Use" (Cardinal, 2023); Brewer's 2016 study, "Government Employees' Perceptions of Government Purchase Card Violations: An Exploratory Case Study" (Brewer, 2016); and Hatch's 2010 publication on "Misuse of Government Purchase Cards" in the Congressional Research Service (Hatch, 2010)—exemplify this emphasis.

The limited research dedicated to managing the GCPC program within a military framework, particularly in the maritime context, is notable. A search conducted using the Naval Postgraduate School's (NPS's) Dudley Knox Library's database spanning 22 years

(2002-2024) yielded only one article and three theses of this type. Of the three theses, one focused on GCPC implementation aboard Navy destroyers sponsored by CNSP, while the other two pertained to the Marine Corps.

The article "U.S. Government Use of Commercial Card Technology: A Case for Change in Military Card Distribution Policy" by Palmer et al. (2010) identifies the underlying dynamics connected with Government commercial card spending and its impact on the cost savings and efficiency of the government. Since the military services and defense agencies have a big share of government commercial card use, Palmer et al. gave special attention to their role in card use and proposed recommendations to improve commercial card spending (Palmer et al., 2010). Although Palmer et al.'s report discussed GCPC in the military, it did not relate to the change in a program within a maritime context.

The first of the three theses was Carl Koch's 2009 thesis, "Spending Analysis of Government Purchase Card Buys for United States Navy Destroyers". Koch addressed an inquiry from the CNSP regarding effective GCPC program management. Koch's study delved into historical GPC spending patterns across five vessels, utilizing data collection and discussions with card users to examine usage patterns and purchased items. The aim was to propose methods for capturing purchase data for ongoing review by higher authorities, establishing a comprehensive process for controlling monthly GCPC procurements. Koch's research highlighted a lack of visibility beyond the shipboard level in the GCPC Program. With objectives to understand procurement categories and outline future implementation processes, the study suggested recommendations such as standardizing documents and procedures, implementing an electronic database, creating a Type Commander Desktop Guide, emphasizing training, and conducting monthly live reviews and approvals (Koch, 2009). While Koch's thesis shares a similar objective to my study of improving the GCPC program within CNSP, it primarily focuses on studying spending patterns rather than addressing the issue from a change management perspective. Koch's findings emphasize the importance of GPC utilization and the necessity for fiduciary oversight. Although his recommendations are valuable in advocating for the standardization of the GCPC process and the implementation of electronic documentation,

they lack a detailed plan outlining the necessary steps for gatekeepers to implement these changes effectively.

The second thesis, "Rationalization and Internal Control: Improving Marine Corps Unit-Level Internal Management Controls for the Government-Wide Commercial Purchase Card Program" (Wood & Darling, 2003), focuses on enhancing internal management controls within Marine Corps operating forces units related to GCPC programs. Drawing on the fraud triangle as its philosophical framework, this report offers practical methods to mitigate the potential for individuals administering GCPC programs to rationalize improper or illegal actions. The thesis recommends changing individually named cards with personalized numbers associated with the units, altering the card's appearance, controlling the limited number of cards a unit can have, and reporting electronic receipts of daily card holder (CH) transactions to Approving Officials and Agency Program Coordinators (Wood & Darling, 2003). Although this study primarily addresses fraud prevention within GCPC programs, its research framework is valuable for applying changes to improve the GCPC program within the maritime context.

The third thesis, "An Analysis of the Government Commercial Purchase Card within the United States Marine Corps" (Carroll, 2002) delved into the analysis of the GCPC within the United States Marine Corps. The thesis outlines the current utilization and management processes of the GPC in the Marine Corps and examines the latest Marine Corps semi-annual program review. Carroll identifies and evaluates the contemporary challenges faced by the Marine Corps concerning the GPC. While Carroll's primary research question focuses on how the management of the GCPC program can be enhanced within the Marine Corps, the secondary research questions delineate the complete process of the GPC's utilization within the Marine Corps, identify issues or problems encountered, and propose actions necessary for improving the GPCP within the Marine Corps (Carroll, 2002). While Carroll's thesis contributes valuable insights into improving the GCPC Program within a military context, it is important to note that it was completed over two decades ago. Thus, there is a pressing need for contemporary research to address the evolving landscape of military procurement practices.

2. Change Management

While there is limited literature available on change management as it pertains to program modifications in the military context, several sources have relevance for my project. These sources include a GAO report, an article, and two theses that are closely aligned with my objectives.

GAO Report 04–156, titled "Steps Taken to Improve DOD Program Management, but Actions Needed to Address Misuse" (2003), offers a comprehensive overview of the Department of Defense's (DOD's) efforts to enhance purchase card program management. It outlines progress made and emphasizes the importance of continued vigilance, particularly in implementing disciplinary guidelines according to the fiscal year 2003 Bob Stump National Defense Authorization Act. The report acknowledges DOD's efforts to resolve deficiencies in managerial and internal control while recommending ongoing improvements. Despite DOD expressing satisfaction with its endeavors, it refrains from commenting on GAO's 109 recommendations. The report gathers change recommendation information from the Army, Navy, and Air Force representatives, indicating that these services have initiated or completed actions to implement nearly 109 recommendations enhancing the purchase card program management. This report provides valuable insights into change efforts aimed at enhancing the GCPC program within the DOD, with specific data from the Navy.

Austin C. Bonner's thesis, titled "Navy ERP: An Analysis of Change Management" (2013), delved into change management within the context of Navy Enterprise Resource Planning (ERP) implementations. Drawing from literature reviews, historical records, case studies, and interviews, Bonner synthesized information to identify critical success factors in private-sector ERP implementations. He then conducted a comparative analysis to assess the application of these factors in Navy ERP implementation. The primary research question aimed to evaluate the suitability and applicability of these success factors in a DOD environment, which Bonner emphasized operates differently from private industry (Bonner, 2013). While Bonner's work offers valuable insights into modernizing business processes within the Navy from a change management perspective, it, like previous reports, falls short of recommending a specific change model or detailed change steps.

In his thesis, titled "Managing the Transformation: A Change Management Strategy for U.S. Marine Corps Expeditionary Energy Initiatives" (Whitt, 2017), Whitt identified organizational change management models and theories to help the Marine Corps adopt energy-efficient solutions. Through meta-narrative analysis, Whitt constructed a literature review of change management and the Marine Corps organizational characteristics that influenced change. The study summaries revealed that existing change models did not align with the Marine Corps context, thus lacking effectiveness in guiding change. Consequently, Whitt introduced the Portfolio of Change as a concept tailored to structure change for the Marine Corps. Additionally, he presented the USMC Model for Change to develop the Portfolio of Change (Whitt, 2017). Whitt's work offers a significant change management framework for research in a military context that I utilize for this research.

In the article "Military Transformation: Applying the Kotter Eight-Step Methodology for Change in the U.S. Armed Services," published by National Defense University Press in Joint Force Quarterly 91 in November 2018, Hassan M. Kamara utilized a case study of the Navy's nuclear propulsion transformation effort by Admiral Hyman G. Rickover. The article underscored the applicability and utility of Kotter's 8-Step Change methodology (see the following section, "Change Management Theory") to military transformation by examining this historical transformation through Kotter's change model. Kotter concurred with the notion that major change is not easily achieved and identified failure factors in each step of the change process to warn change leaders (Kamara, 2018). By analyzing this military transformation, Kamara provided insights that could help the Armed Forces effectively apply the methodology to modern efforts. Additionally, the article highlighted concerns that could potentially lead to the failure of change efforts. This article offered valuable insights into applying change models, specifically Kotter's model, to transform military programs.

In summary, my investigation revealed a scarcity of research dedicated to GCPC program management within a military framework, especially in the maritime context. Similarly, the literature on change management for military programs is also limited.

Consequently, my research endeavors to fill this gap by employing change management tools to enhance GCPC management within the Navy.

B. REVIEW OF CHANGE MANAGEMENT THEORIES

Change is an inevitable aspect of organizational dynamics, with increasing attention being paid to its role in driving success. Research has highlighted how embracing change can confer competitive advantages upon organizations (Gilley et al., 2009). As discussed in Chapter I, change has been a consistent feature in the evolution of the CNSP GCPC program. Therefore, to ensure the effectiveness of change initiatives, this section delves into key change models. My objective is to cultivate a nuanced understanding of change dynamics and adapt them to suit the unique context of the CNSP GCPC program.

1. Change Models

In this section, I examined four widely applicable change models, each providing unique insights into the change process: Lewin's change model, Kotter's 8-step change model, Deming's change model, and McKinsey's 7S framework.

a. Lewin's Change Model

Early change management models, such as Lewin's Change Model (1951), initially proposed a straightforward three-step process as shown in Figure 5. It begins by acknowledging the current state, followed by efforts to unfreeze and transition from this state. Subsequent actions are taken to implement change and progress towards desired goals. Finally, once the desired state is reached, measures are taken to stabilize or refreeze the situation in its new state. This model offers a simplistic portrayal of stability, change, and then a return to stability, mirroring common experiences in personal life transitions.

Critics of Lewin's change model argue that its linear and static nature does not align well with the complexities of modern organizations. Kanter et al. (2003) suggests that Lewin's conceptualization of change, likening organizations to an ice cube that must be frozen again after change, is outdated and inadequate for contemporary organizational dynamics. Similarly, Child (2005) contends that the notion of "refreezing" in Lewin's model lacks relevance in today's rapidly evolving and adaptable organizational

environment. These critiques highlight the need for more flexible and adaptive approaches to change management in modern organizations, moving away from the rigidity inherent in Lewin's model.

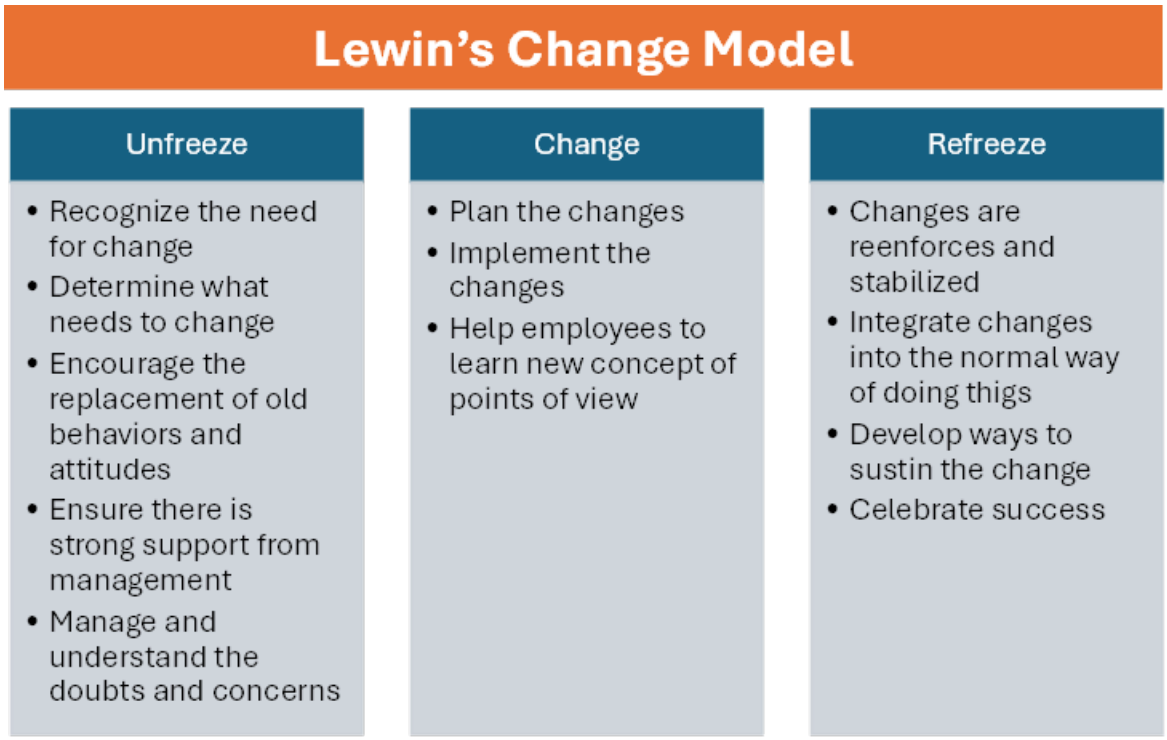


Figure 5. Lewin's Change Model. Source: Adapted from Visual Paradigm Online (n.d.).

b. Kotter's 8-Step Change Model

In contrast to Lewin's simpler model, more comprehensive, multi-step frameworks have emerged, incorporating elements such as leadership, employee engagement, rewards, and communication. Kotter's 8-Step Change Model, shown in Figure 6, is typical of such a more comprehensive framework. It was initially introduced by John P. Kotter in a 1995 article published in the *Harvard Business Review*. Broadly speaking, this model comprises the three distinct phases of creating, engaging and enabling, and implementing and sustaining (Hosey, 2020). It emphasizes the significance of leadership and vision, forming

alliances, effective communication, motivation, empowerment, and integrating new approaches into the organizational culture (Gilley et al., 2009).

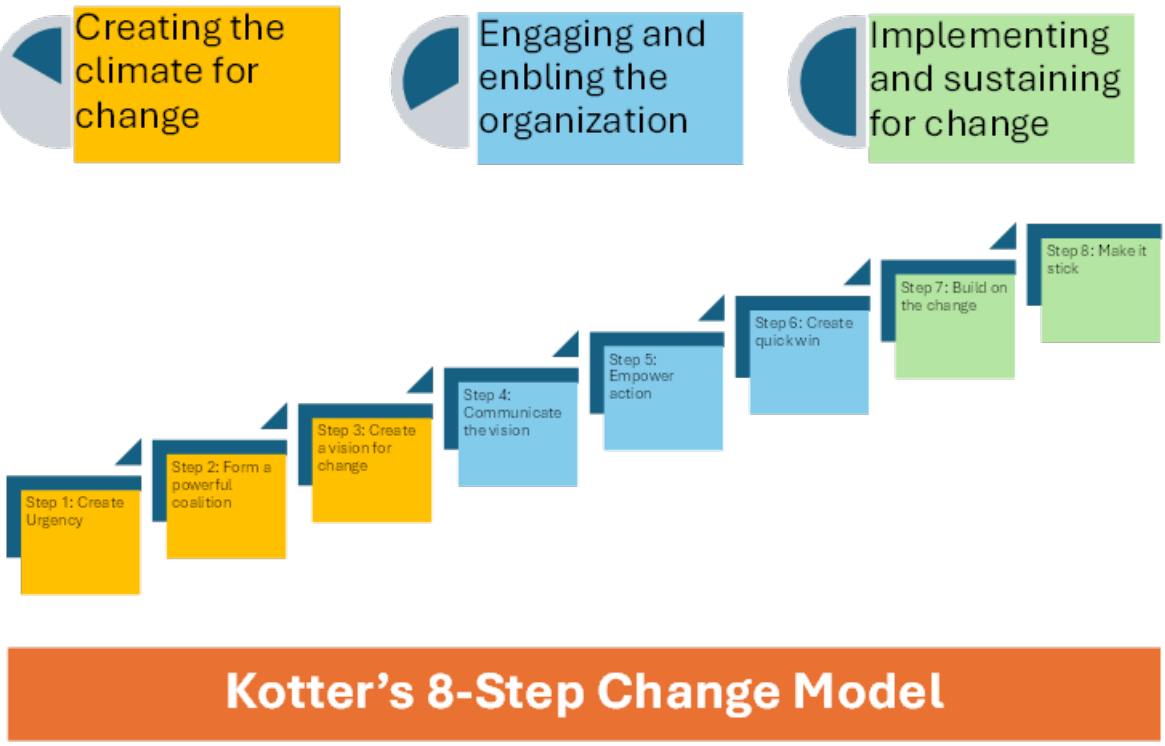


Figure 6. Kotter's 8-Step Change Model. Source: Adapted from Hosey (2020).

First, there is the "Create" phase. Here, the focus lies on establishing a collective understanding of the proposed change and its underlying rationale. Second is the "Engage and Enable" phase. During this stage, the emphasis shifts towards involving and empowering team members, fostering their enthusiasm and commitment to driving organizational change. Last is the "Implement and Sustain" phase. This stage involves maintaining momentum after initial successes, ensuring that the change becomes deeply embedded within the organizational culture and operations.

The eight steps to transforming an organization, according to Kotter, are as follows (Kotter, 1996; Appelbaum et al., 2012):

1. Create urgency: establish a sense of urgency about the need to achieve change, as people will not change if they cannot see the need to do so.
2. Form a powerful coalition: assemble a group with power energy and influence in the organization to lead the change.
3. Create a vision for change: create a vision of what the change is about; tell people why the change is needed and how it will be achieved.
4. Communicate the vision: tell people, in every possible way and at every opportunity, about the why, what, and how of the changes.
5. Empower action: involve people in the change effort, and get people to think about the changes and how to achieve them rather than thinking about why they do not like the changes and how to stop them.
6. Create quick wins: seeing the changes happening and working and recognizing the work being done by people towards achieving the change is critical.
7. Build on the change: consolidate gains and produce more change, create momentum for change by building on successes in the change, invigorate people through the changes, and develop people as change agents. Make it stick: Anchor new approaches in the corporate culture, which is critical to long-term success and institutionalizing the changes. Failure to do so may mean that changes achieved through hard work and effort slip away with people's tendency to revert to the old and comfortable ways of doing things.
8. Make it stick: Link new behaviors to organizational success and ensure the new behaviors persist until they are robust enough to replace old habits. Assess systems and processes to confirm that management practices support and reinforce mindsets, new behaviors, and methods of working that have been adopted. (Kotter, 1996; Appelbaum et al., 2012)

Critics of Kotter's model argue that it suffers from various shortcomings. These critiques highlight its rigid frameworks, which fail to capture the complex and nuanced nature of change. The assumption that success follows a linear progression of sequential steps oversimplifies the intricacies involved in organizational transformation. Additionally, this model neglects the human element and the potential for resistance, leaving organizations ill-prepared to address challenges that may arise. Moreover, Kotter's model tends to operate under the assumption that change will inevitably lead to success, disregarding the prevailing global uncertainty where constant change has become the norm (Gilley et al., 2009).

In Sidorko's (2008) examination of the organizational change process at the University of Newcastle, Sirdorko attributes the successful outcome of the change initiative

to Kotter's model. However, Sidorko contends that Kotter's model lacks flexibility, as it is strictly sequential and mandates following all steps. Sidorko's analysis underscores the necessity of forming multiple guiding coalitions at various stages of the change process, a factor not addressed by Kotter (Sidorko, 2008; Appelbaum et al., 2012).

c. Deming's Cycle

The PDCA cycle, also known as the Deming Cycle, is shown in Figure 7. It consists of four distinct stages—Plan, Do, Check, Act—that should be repeated continuously to achieve ongoing enhancements.

Each cycle commences with the "Plan" stage, when the issues at hand are identified. Here, potential solutions are generated and the most suitable one is selected. In the "Do" stage, the chosen solution is implemented on a small scale, often in a trial format. Following implementation is the "Check" phase, when the outcomes are assessed to ensure they align with expectations. Finally, if the solution performs as anticipated, the "Act" stage begins, when the solution is rolled out across the organization. Once completed, the cycle begins anew, allowing for continuous refinement and improvement in a systematic manner.

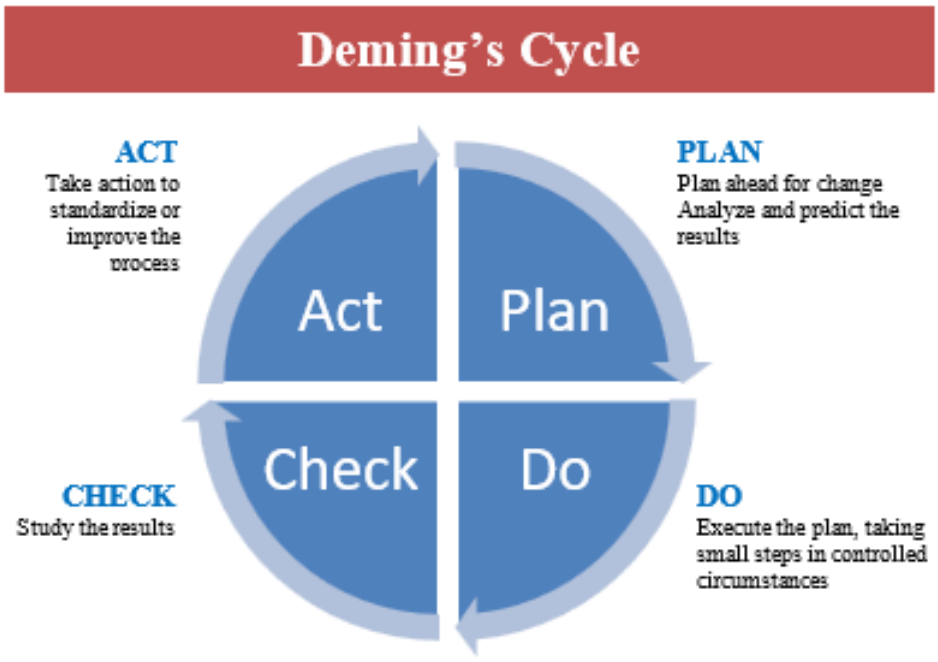


Figure 7. Deming's PCDA Cycle. Source: Adapted from Tang (2016).

Critics contend that the PDCA model oversimplifies the improvement process, disregarding the necessity for a comprehensive and tailored application of the approach. They argue that conducting PDSAs can reveal additional issues beyond the initial improvement objective, such as minor adjustments to current practices or processes. These revelations often illuminate broader cultural or organizational challenges that demand acknowledgment and resolution (Reed & Card, 2016). Bondigas concurs with Reed and Card, asserting that the Deming Cycle lacks flexibility for variables because "it follows a rigid step-by-step process and functions optimally under ideal conditions. It doesn't accommodate the unforeseen variables typical in projects, providing little flexibility for addressing setbacks or fostering spontaneous innovation" (Bondigas, n.d.).

d. McKinsey's 7S Framework

Robert Waterman and Tom Peters developed McKinsey's 7S framework in the 1980s while they were consultants at McKinsey and Company. This framework stands as a robust tool for analyzing organizations as well as their effectiveness (Singh, 2013). McKinsey's 7S framework, shown in Figure 8, incorporates both people and process elements, serving as a strategic planning tool to assess whether an organization is structured effectively to achieve its objectives. "The McKinsey 7S Framework is a simple and relatively straightforward model to assess an organization across a range of critical areas, including strategy, structure, style, staff, skills, systems, and shared values" (Clarke, 2019, p. 3).

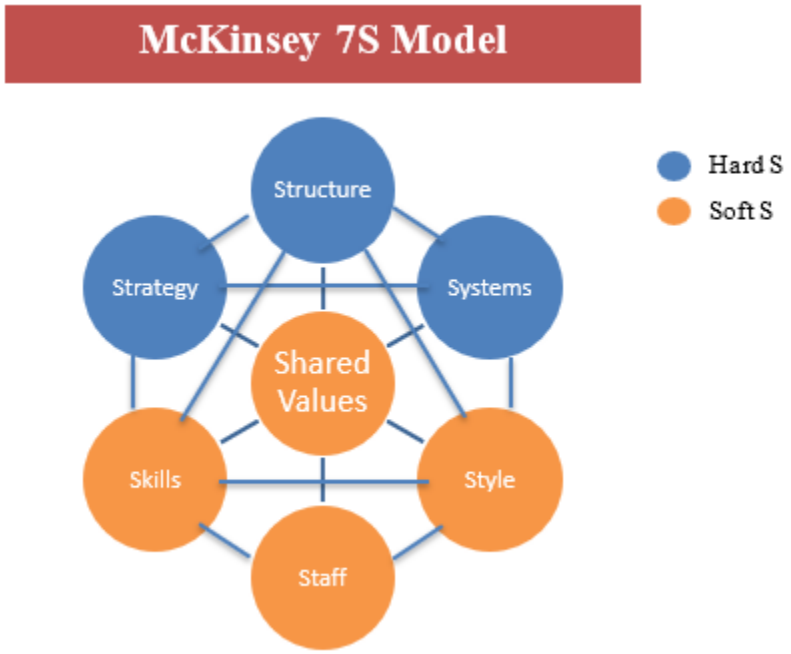


Figure 8. McKinsey's 7S Framework. Source: Adapted from Stanke (2014).

Whereas traditional models focus on organizational structure, the 7S framework emphasis shifted towards coordination as a critical aspect alongside the structure. In this 7S framework, all the elements are interconnected, meaning changes in one area impact all others. Additionally, there is no hierarchy; each area is considered equally important, indicated by their equal size. The framework divides areas into hard (e.g., processes, strategy) and soft (e.g., organizational culture) components. The positioning of shared values at the center underscores their centrality to all aspects of the organization.

According to Peters and Waterman (1982), this model can be used by following five steps:

1. The first step involves the identification of those elements of the framework that do not align properly. It equally involves assessing the inconsistencies in the relationships among all the elements.
2. The second step is concerned with the organizational design optimally; this optimal fit will be different for different organizations.
3. The third step involves deciding the course of action or the changes that are required to be implemented.
4. The fourth step is the actual implementation of the change.

5. The fifth stage is the final review of the 7S framework. (Peters & Waterman, 1982)

This model has garnered significant attention from both academics and practitioners, emerging as one of the foremost tools for strategic planning. Unlike traditional approaches centered solely on tangible assets like capital and infrastructure, it underscores the importance of Human Resources (Soft S—see Figure 8) in driving superior organizational performance. While relatively straightforward to grasp, its implementation poses challenges due to common misconceptions about the ideal alignment of elements. Continuous review and refinement of McKinsey's 7S model are essential for organizations aiming to excel in their respective domains (Jain & Kansal, 2023). In addition, the McKinsey 7S framework does not mention the external environment. The authors admit that other variables exist but they only focus on the most crucial variables in the model (Peters & Waterman, 1982; Hanafizadeh & Ravasan, 2011).

2. Conclusion

Reviewing change models by Lewin, Kotter, Deming, and McKinsey provides insights into the applicability of different models to the CNSP organizational context, and identifies elements most relevant to the dynamics of the GCPC Program. Recognizing that change management is not one-size-fits-all, I customized my approach by drawing from various frameworks to address the specific challenges and opportunities within the GCPC Program at CNSP. By leveraging well-established models and accessing proven best practices, I can navigate the complexities of change effectively. Moreover, incorporating insights from multiple models fosters a culture of continuous improvement within the GCPC Program, ensuring sustainable success and resilience over time. For example, some of these insights are the importance of preparing the organization for change from Lewin's change model, the necessity of building a guiding coalition and creating a vision for change from Kotter's change model, the value of iterative testing and continuous feedback from Deming's cycle, and aligning strategy and shared values to ensure that the change efforts are cohesive and support the overall mission of CNSP from Mc Kinsey's 7S model.

C. SELECT CHANGE MANAGEMENT MODEL

Each of the four change models mentioned—Lewin's Change Model, Kotter's 8-Step Model, Deming's Cycle, and the McKinsey 7S Framework—offers unique advantages and limitations. However, none of them are entirely suited to the Navy context.. In deciding on a change management model for my research, I carefully considered the specific variables within the CNSP GCPC Program. This approach grants the flexibility to blend elements from various models, crafting a customized solution that best suits my requirements. By integrating components from different change management frameworks, I can develop a strategy tailored to the unique circumstances of the CNSP, enhancing my ability to navigate change effectively.

D. SUMMARY

In this chapter, I conducted a thorough review of the existing literature on GCPC Management and Change Management within maritime contexts. My analysis identified a significant gap in research about these topics, with existing studies often outdated and failing to account for advancements in technology and processes.

Furthermore, I explored four change management models aimed at assisting leaders and managers in navigating organizational change processes. These models provide valuable frameworks for understanding the various phases of change and outlining steps for effective implementation, thereby contributing to improved organizational management. My proposed change model builds upon insights from these models, offering a customized approach tailored to the specific needs of the GCPC Program within CNSP. This model serves as the foundation for the recommended change steps outlined in Chapter V.

III. METHODOLOGY

This chapter provides an overview of the methodology used in this research. It outlines how I approached the research questions and gives a detailed description of how the study was conducted, from the initial idea to the final analysis. It also details those who participated in the study, explains their roles and describes the materials and procedures I used for data collection and analysis. By presenting the methodology this way, I hope to set the stage for a thorough exploration and discussion of my research findings in the following chapters.

A. METHOD

I used the mixed-method approach in my research, combining both quantitative and qualitative research methods to comprehensively assess the performance and trends of the GCPC program across CNSP's fleet of vessels. Using quantitative methods, I statistically analyzed the interview data and then used qualitative methods to explain the existence of unexpected patterns or to uncover mechanisms that might have created the pattern. The quantitative analysis was embedded within the qualitative analysis, meaning one form supported the other (McGregor, 2018). By integrating these two distinct approaches, I aimed to capture the program's complexity effectively. The strengths of the mixed-method approach include the following:

- **Comprehensive insights:** The combination of methods allowed me to explore both subjective experiences and objective measures. I did not rely solely on numbers or anecdotes.

- **Methodological rigor:** By cross-validating findings, I minimized bias and strengthened my research design.

- **Actionable recommendations:** My conclusions were robust, enabling me to provide actionable recommendations to improve the GCPC program.

This mixed-method approach facilitated a nuanced exploration of the program, ensuring that my analysis considered both the human context and quantitative indicators

and enabling me to gain insights that stakeholders can use to enhance GCPC practices across CNSP's fleet vessels.

B. RESEARCH STEPS

There were two separate analyses, quantitative analysis and qualitative analysis.

1. Step 1: Quantitative Analysis

In the realm of quantitative research methodology, researchers observe natural variations in existing situations. Through the use of estimation and inferential statistics, researchers establish causal relations between independent and dependent variables. The exploratory scientific quantitative method entails making observations, searching for patterns, and subsequently drawing tentative conclusions or generalizations about how some aspect of the world operates (McGregor, 2018). In this case, I reviewed the CNSP GCPC data to observe patterns and draw conclusions about the compliance status of the ships according to the CNSP GCPC's policy.

a. Data Collection

I gathered data from sources within the DON and selected data that related to my topic of GCPC management. I focused my efforts on Pacific Fleet Force surface vessels and data such as historical 2022 and 2023 GCPC scores, vessels' home port assignments, and their associated personnel. I reviewed two datasets that were emailed to me by a CNSP data analyst:

- **CNSP GPC MGT TOOL**: This MS Excel Tracker serves as a shared file for all ATG auditors to update live GCPC scores assigned to ships. The dataset includes ship listings by region and specifies the auditors responsible for conducting the assessments.

- **CNSP GCPC DATA**: This Excel Tracker, derived from the above CNSP GPC MGT TOOL file that was overseen by the CNSP data analysts provides a summary of GCPC scores for all surface ships by quarter. This dataset covers a span of two calendar years, from January 1, 2022, to December 31, 2023.

b. Quantitative Method

From CNSP's GCPC policy regarding compliance mentioned in Chapter I, I developed compliance criteria. I considered whether a unit was compliant or not compliant based on the following four criteria:

- Submission of GCPC binders for ATG initial audit (on time or late)
- Result of ATG initial audit (pass or fail)
- Submission of GCPC binders for ATG reaudit (on time or late)
- Result of ATG reaudit (pass or fail)

Table 5 summarizes these criteria, which are the variables involved in the compliance metric.

Table 5. Compliance Criteria

Compliance Criteria	Compliance Condition
Submitting GCPC binders for ATG initial audit	Quarterly GCPC binders submitted within 14 days after the quarter's end: Compliant; Otherwise: Not compliant.
Result of ATG initial audits	Unit scores above 80% in each quarterly audit: Compliant; Otherwise: Not compliant.
Submission of GCPC binders for ATG reaudit	Corrections to ATG submitted within 21 days after receiving a failing ATG audit score: Compliant; Otherwise: Not compliant.
Result of ATG reaudit	Unit scores above 80% at reaudit: Compliant; Otherwise: Not compliant.

The next step involved constructing a suitable statistical model to analyze the relationships between various variables to forecast compliance status. Utilizing descriptive statistics, I categorized individual ships into six distinct groups based on their performance metrics, encompassing submission timeliness and audit outcomes. Subsequently, I compared the means of these groups to discern significant disparities.

I categorized the CNCP policy into two primary classifications: compliant and noncompliant.

(1) Two groups were considered compliant:

- **Group 1**: Ships submitted the GCPC binder for audit on time and achieved a score above 80% in the ATG audit.
- **Group 2**: Ships submitted the GCPC binder for reaudit on time and achieved a score above 80% in the ATG reaudit.

(2) Four groups were considered noncompliant:

- **Group 3**: Ships submitted GCPC binder for audit late.
- **Group 4**: Ships submitted the GCPC binder for reaudit on time but scored below 80% in the reaudit.
- **Group 5**: Ships submitted GCPC binder for reaudit late.
- **Group 6**: Ships scored below 80% in both audit and reaudit.

I constructed the compliant–noncompliant matrix, as illustrated in Table 6. This model is tailored to scrutinize compliant status every quarter. However, considering the CNSP GCPC policy, ships facing noncompliance for two consecutive quarters or more undergo GCPC status suspension. Consequently, an additional group, Group 7, was introduced to accommodate such scenarios.

- **Group 7**: Ships have the noncompliant status for two consecutive quarters or more.

Table 6. Compliant–Noncompliant Matrix

Group	Classification	Audit On Time	Audit Late	Audit >80%	Audit <80%	Reaudit On Time	Reaudit Late	Reaudit >80%	Reaudit <80%
1	Compliant	x		x					
2	Compliant					x		x	
3	Noncompliant		x						
4	Noncompliant					x			x
5	Noncompliant						x		
6	Noncompliant				x				x

I examined whether there was a relation between the score trends of ships rated compliant and those rated noncompliant consistently across quarters. This analysis aimed to assess past performance and predict future compliance status by identifying patterns of behavior associated with compliance or noncompliance.

c. Data Queries

I further organized the data based on four geographical locations within the Pacific Fleet—San Diego, the Pacific Northwest, Hawaii, and Japan—each overseen by respective ATGs. Within each region, I delved into localized trends. This expanded dataset provided a broader participant sample, offering insights into program effectiveness across different geographical areas. Utilizing these data, I formulated questions aimed at identifying trends and assessing the severity of compliance issues:

- **How many ships operate in each region, and how many are currently under probation?** The answer to this question provides a quantifiable overview of compliance concerns across different regions.
- **What is the average score per location, as well as the total average score?** The answer to this question evaluates the overall performance of ships within various locations and throughout the CNSP.

(1) Reviewing Compliant Data by Region

- **How many ships consistently submit their GCPC binder for audit on time?** This question seeks to understand the adherence to deadlines among ships. It measures the number of ships that regularly meet the submission deadline for their GCPC binder audit.

- **What is the percentage of ships that pass the audit on their initial attempt?** This question evaluates the success rate of ships in passing the audit during their first attempt. It provides insights into the initial compliance level of ships with the CNSP's policies.

- **How many ships submit their reaudit on time and subsequently pass?** This question focuses on ships that fail the initial audit but later undergo a reaudit. It assesses the punctuality of reaudit submissions and the effectiveness of corrective actions taken by ships to pass the reaudit.

- **What is the proportion of ships that pass during the reaudit?** This question examines the success rate of ships during the reaudit process. It helps in understanding whether ships can rectify their compliance issues and achieve compliance during the reaudit.

- **How many ships fail both the initial audit and the reaudit?** This question identifies ships that face persistent compliance issues, failing both the initial audit and the subsequent reaudit. It highlights areas where ships may need additional support or interventions to meet compliance standards.

(2) Identifying Best Practices and Persistent Issues

- **Which ships consistently maintain compliance, and which consistently fail?** This question helps to identify any discernible best practices or patterns of failure to learn from or emulate.

- **How many ships experience consecutive failures for two or more quarters?** This question helps pinpoint persistent compliance issues requiring targeted intervention.

- **Are there any ships showing improving or declining compliance scores over time?** This question analyzes the compliance trends to identify areas for improvement or areas of concern.

(3) Examining Support Systems

- **Which regions demonstrate effective support systems, and how do they achieve this?** This question investigates successful strategies and support mechanisms for addressing noncompliance.

- **What is the progression of ships that initially fall below the 80% threshold?** This question helps to understand the patterns and trends of noncompliance to determine potential intervention strategies.

- **What interventions occur after the initial failure, who assists, and how effective are these interventions?** This question evaluates the effectiveness of intervention measures in addressing noncompliance and achieving program goals.

(4) Assessing the Impact of Standardization

- **Is there a relation between changes in home port and compliance failures?** This question assesses the impact of logistical changes on compliance outcomes and identifies associated risk factors.

These questions align with the primary and secondary research questions by identifying challenges, proposing improvements, and understanding factors that contribute to noncompliance within the GCPC program.

d. Quantitative Study Limitations

The dataset used in my study is limited to data from 2022 and 2023. This narrow time frame may not provide a comprehensive representation of the overall health of the GCPC program, considering potential fluctuations in manpower, operational tempo, and personnel rotation. Additionally, the dataset does not consider shifts in ships' home port locations between regions. Hence, I concluded that a qualitative study was necessary to complement the data.

2. Step 2: Qualitative Analysis

Qualitative research delves into the natural environments of participants, aiming to grasp the nuances of their thoughts and feelings within their specific contexts, without scrutinizing the validity of these emotions (McGregor, 2018). In this study, qualitative analysis complemented the quantitative findings by spotlighting trends and patterns. Moreover, it facilitated the collection of improvement ideas from subject matter experts, enriching the design of the change model detailed in Chapter V.

a. Data Collection

I utilized a variety of methods, such as face-to-face interactions, phone calls, virtual meetings via MS Teams, and email correspondence. This diverse approach enabled me to engage participants through different channels, accommodating their preferences and ensuring comprehensive data collection across various communication platforms.

I conducted in-depth interviews with key stakeholders involved in the GCPC program who were mentioned in Chapter I to explore their perspectives, experiences, and challenges related to implementation. Engaging a diverse group, including HL4 data analysts, CNSP policymakers, HL4.5 trainers/auditors at ATG, and HL5 A/OPC personnel, I extended interviews to participants at HL2 and HL3 for additional insights. See Table 7 for a list of participants.

Table 7. Interview Participants

Level	Participants	Method of Collecting Data
HL 2	NAVSUP CCPMD	Interview (1 person)
HL 3	PACFLT data analyst	Interview (1 person)
HL 4	CNSP data analyst	In-Person (4 personnel) and Data Research
HL 4.5	ATG trainers/auditor	In-Person (4 personnel) and Data Research
HL 5	A/OPC	Interviews (10 personnel)

Following the Doctrine, Organization, Training, Materiel, Leadership and Education, Personnel, Facilities, and Policy (DOTMLPF-P) framework, I developed the questionnaires aligned with my research questions, facilitating an in-depth exploration of the challenges, compliance issues, and potential improvements associated with the GCPC program in CNSP. This framework has been widely used in the military and enables a comprehensive assessment of the current state of the GCPC program within CNSP. By evaluating each element of the framework, including DOTMLPF-P, I aimed to pinpoint specific areas for improvement and address capability gaps effectively.

The interview results were calculated by scoring the number of similar ideas out of 10 participants on 10 ships. The greater the frequency of common ideas, the greater the impact on the result.

(1) Questionnaire for Ship's Personnel (HL5 A/OPC)

Questions for ships and inquiries delved into financial aspects such as expenditure and budget allocation, operational aspects like transaction frequency and types of purchases, and organizational factors such as training effectiveness and leadership pressure. The questions included the following:

- How much is spent using GCPC in a year?
- What approximate percentage of the ship's total annual spending is attributed to GCPC expenditures?
- How many GCPC transactions occur per month?

- What are the common items or services bought with GCPC?
- How are trainings conducted for GCPC users?
- How often do personnel involved with GCPC rotate?
- How do you stay updated with current or revised GCPC policies?
- What are some common reasons for the lateness of quarterly GCPC binder submissions?
- Are you aware of the consequences of noncompliance with CNSP GCPC policy?
- Does the Commanding Officer apply pressure regarding GCPC purchases?
- How easy is it to use GCPC, and how important is it to your operations?
- How many transactions per month make you feel uncomfortable?
- Who do you reach out to if you encounter issues with GCPC?
- What is the typical response time when seeking help for GCPC issues?
- How many hours do you spend on GCPC-related tasks each week?
- Has your ship ever been suspended? If so, why?
- What are some reasons for delays in processing Open Purchase Requests?
- What else should we consider when trying to improve the GCPC process?

(2) Questionnaire for ATG auditors (HL 4.5)

In questions for ATG trainers/auditors, the focus was on program challenges, training methods, grading criteria consistency, and factors for process enhancement. The questions included the following:

- What are the common issues with the GCPC program?
- How many ships are in your territory?

- How do the auditors get trained?
- What grading list do the auditors use?
- Is the grading list the same as those the ships use? Are grading criteria the same across PACFLT?
- Do you provide GCPC training? How often?
- Do all sites apply the same GCPC checklist?
- How punctual are ships in submitting their GPC binder?
- How often do ships turn in records?
- What else should we consider when trying to improve the process?

(3) Questionnaire for CNSP GCPC data analyst (HL4 A/OPC)

Questions for CNSP addressed program oversight, policy updates, participant roles and training, and reporting mechanisms:

- How many ships were suspended in 2022 and 2023?
- How often do policies get updated?
- How does the update get communicated to the ships?
- How many people govern this program?
- How many ships are involved?
- What is the structure of the GCPC program?
- Did they ensure the ship got the message?
- How do the participants get trained?
- How does a ship exit probation?

- How does a ship exit suspension?
- Is there a central instruction for the whole program?
- Does CNSP report findings anywhere?
- What are the different software/platforms within the GCPC program?
- What are the criteria for a ship to be on probation?
- What else should we consider when trying to improve the process?
- What other considerations should be considered when seeking to improve the process?

(4) Questionnaire for COMPACFLT data analyst (HL3 A/OPC)

The questions for NAVSUP CCPMD concentrated on the existence and maintenance of comprehensive instructions, PCAN issuance and management, and training provisions for auditors, along with considerations for process improvement. They included the following:

- What role does HL3 play in the GCPC Program?
- How many individuals oversee HL3?
- What is the number of HL4 entities you are responsible for managing, and could you provide their names?
- What expectations/requirements do you have for HL4?
- How often do you communicate with them, and by what means?
- What are the expectations/requirements of HL2 for HL3?
- Which instructions guide your actions in your role?
- Have you issued any policies, and have there been any subsequent changes?

- How frequently are these policies updated, and how are the changes communicated?
- What challenges do you foresee in the GCPC Program?
- What are your recommendations to improve the program?

(5) Questionnaire for NAVSUP CCPMD (HL2 GCPC staff)

I extended the survey to an additional hierarchy level within the GCPC to capture a more comprehensive view of the program. My questions for the HL2 staff included:

- Do you train ATG auditors?
- Please tell me more about GCPC training.
- How are policy updates distributed?
- Is there a checklist for grading GCPC?
- Is there any training from NAVSUP for ATG auditors to grade ship GCPC?
- Who is responsible for the upkeep of the GCPC instruction?
- What else should we consider when trying to improve the process?

In summary, the questionnaires aimed to comprehensively assess various aspects of the GCPC program across different stakeholders. Overall, the questionnaires aimed to gather insights to optimize the GCPC program across its life cycle, from implementation to oversight and improvement.

b. Thematic Analysis

After data collection, I transcribed and analyzed the interview data. I captured specific codes that represent concepts, ideas, and emotions present in the data. I then generated themes, which provided a bigger coverage encapsulating multiple codes. From the themes, I sought to provide context to help understand the underlying dynamics of the

program. For example, I discovered common challenges faced by fleet personnel when adopting GCPC practices.

3. STEP 3: Integration of Qualitative and Quantitative Findings

I applied concurrent parallel design methods to integrate findings from qualitative and quantitative analyses. This approach allowed me to combine qualitative and quantitative data, offering a comprehensive understanding of the GCPC program within CNSP. While quantitative data revealed broader patterns and trends (breadth), qualitative data furnished rich context and detail (depth), collectively enriching my comprehension of the program's operation.

When qualitative and quantitative results converged, I achieved triangulation. For instance, if interviewees highlighted a specific challenge, I checked whether my dataset supported their observations. Triangulation enhanced the validity of my conclusions.

4. STEP 4: Recommendations

After identifying challenges within the CNSP GCPC program, I proposed recommendations for improvement, including a tailored change model with actionable steps to address compliance issues effectively.

C. SUMMARY

This chapter delineated the research methods, tools, and techniques employed to address the research questions. Utilizing a diverse array of tools—including thematic analysis, mixed-method approaches, quantitative and qualitative analyses, and statistical analysis—facilitated a comprehensive investigation. These methods proved instrumental in uncovering patterns and relations between challenges and compliance with CNSP GCPC policy, bolstering the validity and comprehensiveness of the study.

IV. ANALYSIS

This chapter presents an in-depth analysis of research findings related to the management of the GCPC. My methodological framework is multifaceted, combining both qualitative and quantitative analyses, as outlined in Chapter III. This mixed-method analysis sheds light on the inherent complexities of GCPC management and facilitates evidence-based decision-making to recommend the change steps in Chapter V.

My research objectives primarily focused on identifying the main challenges associated with the GCPC program within CNSP, proposing potential improvements, and recommending change steps to prevent noncompliance aboard ships within CNSP.

A. QUANTITATIVE ANALYSIS

First, I examined the dataset that was provided by CNSP data analysts to identify the trends.

1. Description of Quantitative Data Collected

Referring to the CNSP ATG AUDIT TRACKER from February 2024, spanning from Quarter 1 (Q1) of 2022 to Quarter 4 (Q4) of 2023 (a period of 2 years), I organized the data into four geographical regions within the Pacific Fleet: San Diego, the Pacific Northwest (PACNORWEST), Hawaii, and Japan. The dataset encompassed 74 active GCPC programs across these regions, excluding pre-commissioning and decommissioned ships. Figure 9 provides a visual representation of the distribution of ships, and Figure 10 represents ships under probation across the various regions. (Here, "probation" is the consequence of noncompliance; refer to the CNSP GCPC compliance policy in Chapter I.)

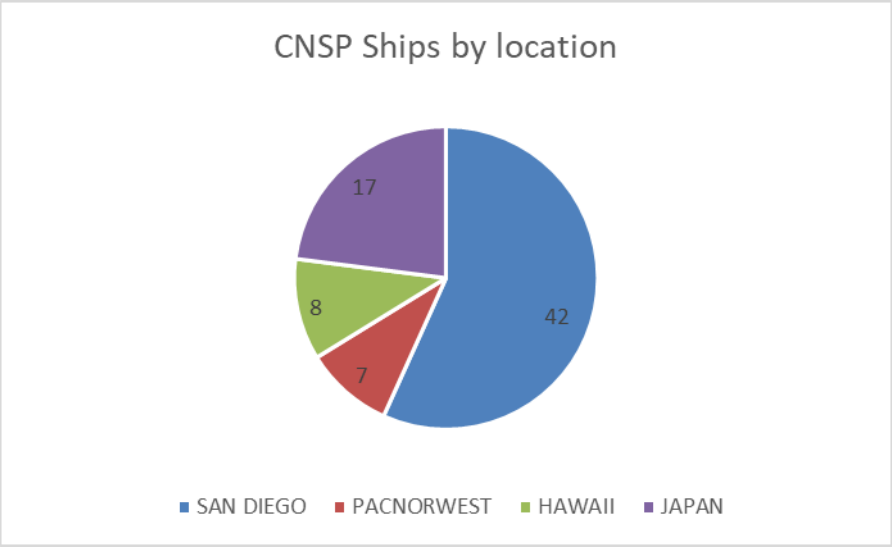


Figure 9. Number of CNSP Ships by Location

From the vessels and their home port location above, I extrapolated data and displayed their probation status. The data is summarized in Table 1.

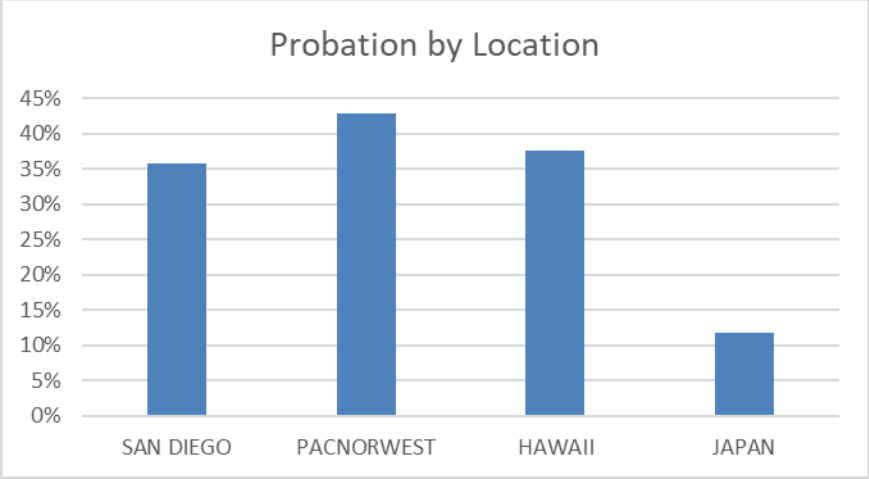


Figure 10. Percentage of Probation by Location

Figures 9 and 10 suggest the following:

- **Regional Variances**: There is a notable disparity in the percentage of ships on probation across regions. While PACNORWEST has the highest percentage at 43%, Japan stands at the lowest with just 12%.

- **Magnitude of Probation**: Despite Japan having the lowest percentage, it still accounts for a considerable number of ships on probation due to the larger total number of ships in the region. Conversely, even though PACNORWEST has the highest percentage, its absolute number of ships on probation is relatively small compared to regions like San Diego.

- **San Diego Dominance**: San Diego not only has the largest absolute number of ships on probation but also a significant percentage of overall ships on probation, indicating a concentrated issue in that region.

- **Hawaii's Moderation**: Hawaii falls between San Diego and PACNORWEST in terms of both the absolute number and percentage of ships on probation, suggesting a moderate level of enforcement or compliance in the region.

- **Total Percentage**: The total percentage of ships on probation across all regions is 31%, indicating that a significant portion of vessels in these areas are under probationary measures.

In retrospect, the data suggests a need for closer examination of enforcement strategies and compliance efforts, especially in regions like San Diego, where the percentage of ships on probation is notably high. Additionally, the data highlights potential differences in regulatory effectiveness and compliance culture across different maritime jurisdictions. Understanding these nuances is essential for informed decision-making and improving overall program management.

2. Presentation of Quantitative Findings

Going deeper into the dataset reveals several significant trends that shed light on the performance variability across naval units and quarters. Table 8 provides a synthesized analysis incorporating the provided insights.

Table 8. Late Submission GCPC Binder

Ships	Q1/22	Q2/22	Q3/22	Q4/22	Q1/23	Q2/23	Q3/23	Q4/23
DANIEL INOUYE (DDG-118)	LATE		LATE					
HOPPER (DDG-70)	LATE							
MOMSEN (DDG-92)		LATE	LATE	LATE				
RUSHMORE (LSD-47)	LATE			LATE				

(1) Trend 1: Submission of GCPC Binders Not On Time or Late

Among the 74 ships assessed, only four exhibited late submissions of the GCPC binder in 2022, as indicated in Table 8. This relatively low ratio is noteworthy. However, it is concerning that these instances of late submission were recurrent on those specific ships. This recurrence suggests potential issues such as inadequate leadership within the ships' Supply Department, broader shortcomings in the ships' HA, or a lack of oversight from the local ATG. The trend of late submissions ceased in 2023, which could indicate a change in policy or an improvement in operational procedures.

(2) Trend 2: Ship Compliance at First Audit (Submit On Time and Pass 80%)

In retrospect, the data suggests a need for closer examination of enforcement strategies and compliance efforts, especially in regions like San Diego, where the percentage of ships on probation is notably high. It highlights potential differences in regulatory effectiveness and compliance culture across different maritime jurisdictions.

Compliance rates are expressed as the percentage of vessels meeting certain criteria. These observations provide valuable insights into compliance trends and performance across different locations, illustrated in Table 9 and Figure 11.

Table 9. Percentage of Ship Compliance First Time by Region

Region	Q1/22		Q2/22		Q3/22		Q4/22		Q1/23		Q2/23		Q3/23		Q4/23	
SAN DIEGO	22	52%	19	45%	16	38%	18	43%	25	60%	25	60%	28	67%	24	57%
PACNORWEST	2	29%	3	43%	2	29%	3	43%	3	43%	5	71%	2	29%	3	43%
HAWAII	3	38%	4	50%	4	50%	3	38%	3	38%	3	38%	6	75%	3	38%
JAPAN	15	88%	14	82%	14	82%	11	65%	12	71%	13	76%	15	88%	14	82%
Total CNSP	42	57%	40	54%	36	49%	35	47%	43	58%	46	62%	51	69%	44	59%

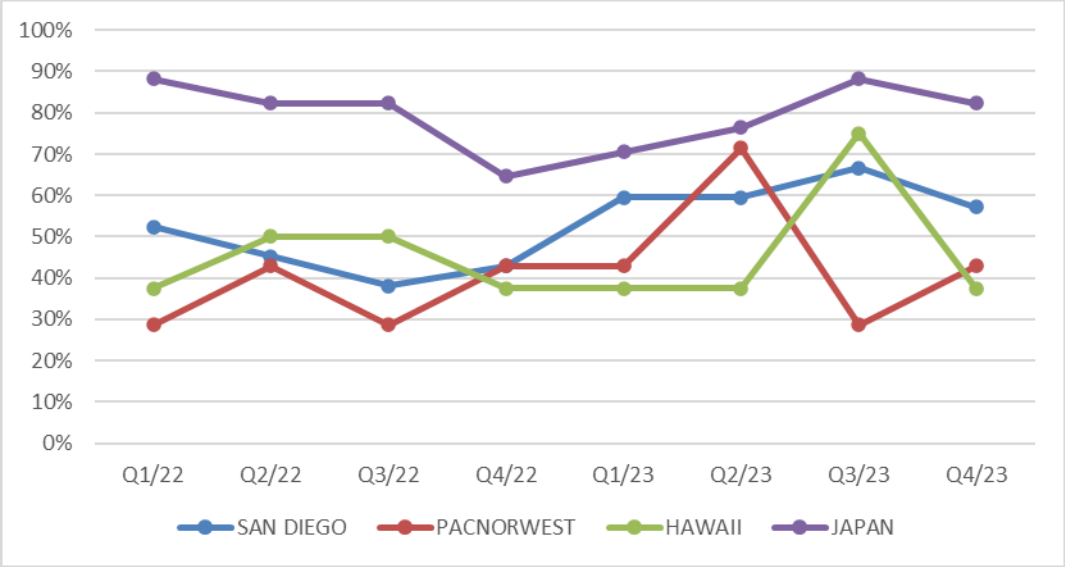


Figure 11. Percentage of Ship Compliance First Time by Region

San Diego consistently had the highest number of vessels. However, its compliance rates fluctuated, showing an overall increasing trend from 52% in Q1/22 to 67% in Q3/23 before dropping slightly to 57% in Q4/23. Despite fluctuations, compliance rates generally improved over time.

PACNORWEST had a smaller number of vessels compared to San Diego. Compliance rates varied widely, with fluctuations between 29% and 71% over the quarters. While there were improvements from Q1/22 to Q2/23, compliance rates dropped in Q3/23 before recovering slightly in Q4/23.

Hawaii had a moderate number of vessels and showed relatively stable compliance rates ranging from 38% to 75% over the quarters. Compliance rates peaked in Q3/23 before dropping slightly in Q4/23.

Japan consistently had a high number of vessels and maintained relatively high compliance rates throughout the quarters, ranging from 65% to 88%. Despite minor fluctuations, Japan demonstrated strong compliance with the criteria. This observation suggests that either Japan's auditors have more lenient standards for ships in the region, or Japan's ships manage the GCPC Program more effectively.

The overall compliance rates for CNSP show fluctuations but general improvement over time, increasing from 57% in Q1/22 to 69% in Q3/23 before dropping slightly to 59% in Q4/23. This improvement suggests that efforts to enhance compliance were effective overall, although there were fluctuations among individual locations. This prompts consideration of the impact of the change measures implemented by CNSP in the GCPC Program.

(3) Trend 3: Ship Compliance at Reaudit

This trend emerged from an analysis of ships that were compliant with reaudit, which means the ships submitted the GCPC binder on time for reaudit and passed. See Table 10 and Figure 12.

Table 10. Ships Comply at the Reaudit

Region	Q1/22	Q2/22	Q3/22	Q4/22	Q1/23	Q2/23	Q3/23	Q4/23
SAN DIEGO	40%	43%	50%	67%	76%	76%	29%	50%
PACNORWEST	100%	100%	100%	50%	50%	50%	20%	0%
HAWAII	20%	25%	75%	60%	80%	80%	50%	0%
JAPAN	100%	100%	67%	100%	40%	0%	0%	33%

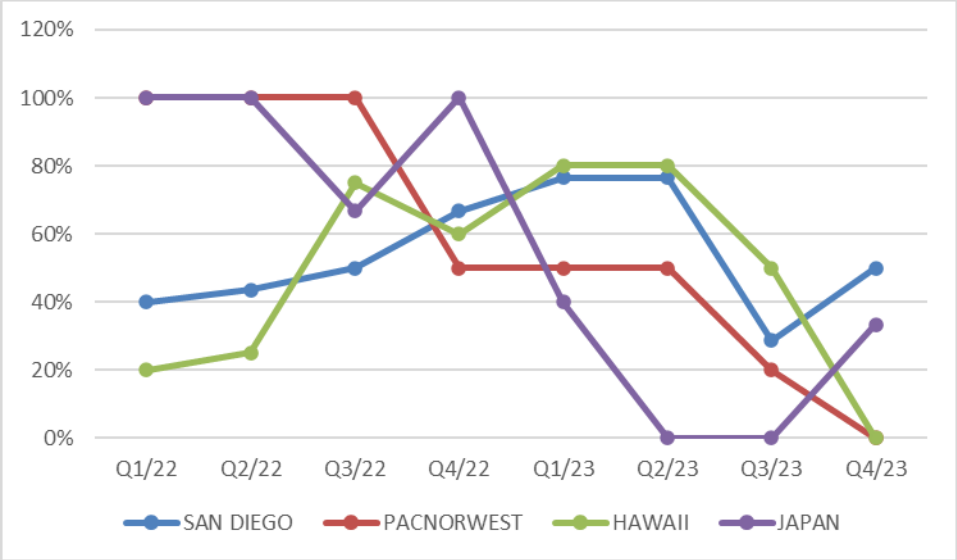


Figure 12. Ships Comply at the Reaudit

Compliance rates in San Diego varied considerably over the quarters. The rates ranged from a low of 29% in Q3 of 2023 to a high of 76% in Q1 of 2023 and Q2 of 2023. There were fluctuations in compliance rates, with peaks in Q1 of 2023 and Q2 of 2023 followed by a sharp decline in Q3 of 2023 before a partial recovery in Q4 of 2023.

PACNORWEST initially demonstrated perfect compliance (100%) in Q1 of 2022, Q2 of 2022, and Q3 of 2022, but compliance rates dropped to 50% in Q4 of 2022 and further decreased in subsequent quarters. The compliance rates experienced significant fluctuations, reaching as low as 0% in Q4 of 2023.

Compliance rates in Hawaii also varied across the quarters, ranging from 20% to 80%. There were fluctuations in compliance rates, with peaks in Q1 of 2023, Q2 of 2023, and Q3 of 2023, followed by a sharp decline in Q4 of 2023, where compliance dropped to 0%.

Japan initially demonstrated high compliance rates in Q1 of 2022 and Q2 of 2022 (100%) but experienced fluctuations in subsequent quarters. Compliance rates varied widely, reaching as low as 0% in Q2 of 2023 and Q3 of 2023 before showing a partial recovery in Q4 of 2023. This result suggests that the audit criteria in Japan may differ from those in other regions.

(4) Trend 4: Relation Between Compliance Level and Support from ATG

I investigated the potential relation between compliance levels and the support systems offered to ships by ATG in the region. With more auditors available, ATG provided increased support to ships through training and guidance. By examining this relationship, my goal was to gain insights into the effectiveness of ATG support systems and their influence on compliance across various regions. I analyzed the association between the number of ships, the quantity of ATG auditors, and the ratio between auditors and ships to gauge the level of support across different locations. The results are in Table 11.

Table 11. Level of Support

Location	Number of Ships	Number of ATG Auditor	Level-of-Support Ratio
SAN DIEGO	42	6	1:7
PACNORWEST	7	1	1:7
HAWAII	8	4	1:2
JAPAN	17	3	1:6
TOTAL	74	14	1:5

The support ratios across different locations were as follows:

- **San Diego** had 42 ships and 6 ATG auditors, yielding a support ratio of 1:7.
- **PACNORWEST** had 7 ships and 1 ATG auditor, maintaining the same 1:7 support ratio.
- **Hawaii**, however, presented a distinct scenario with 8 ships and 4 ATG auditors, resulting in a support ratio of 1:2. This ratio indicated a comparatively higher concentration of ATG auditors per ship.

- **Japan** fell in between, with 17 ships and 3 ATG auditors, leading to a support ratio of 1:6.

Support ratios ranged from 1:2 to 1:7 across different locations. Hawaii's ratio of 1:2 stood out as notably lower, while San Diego and PACNORWEST both had a ratio of 1:7, suggesting a similar allocation of support resources. Assessing the level of support with compliance percentages in each region will provide insights into the effectiveness of these support measures, a topic I explore further in Chapter V.

(5) Trend 5: Identification of Good Practices

I examined ships with consistently high compliance rates, which indicated they followed better practices. Conversely, I investigated ships that continually failed to meet compliance standards to uncover underlying issues. By analyzing these factors, I aimed to gain insights into effective practices and address any challenges faced by noncompliant ships.

In 74 ships of CNSP, some ships managed their GCPC compliance effectively. I filtered the "probation" ships out of the database and focused on ships that had an average score above 80% and had no two consecutive cycles below 80% (see Table 12).

Table 12. Ships With a Score Above 80% by Region

Region	Number of Ships with Strong Compliance	Total Ships in the Region	Percentage	Average Score
SAN DIEGO	15	42	36%	87%
PACNORWEST	2	7	29%	82%
HAWAII	1	8	13%	91%
JAPAN	12	17	71%	95%
CNSP Total	30	74	41%	84%

Of 74 ships in the GCPC Program, 30 had compliance of >80%. In this category, the majority of ships submit on time and pass the first audit. Japan stands out with a commendable 95% of ships that have the best compliance, while Hawaii ranks last in compliance at 13%. San Diego and PACNORWEST fall in between, with 36% and 29%

compliance rates, respectively. For the average score, Japan led at 95%, followed by Hawaii at 91%, San Diego at 87%, and PACNORWEST at 82%. Overall, the CNSP total compliance rate stands at 41%. In both categories, Japan scores higher than other regions. This trend indicates that Japan outperformed other regions in terms of compliance, showcasing a robust adherence to GCPC program requirements.

(6) Trend 6: Identification of Persistent Failure

I examined ships with persistent scores below 80%; the data are shown in Table 13 and Figure 13 below.

Table 13. Ships With Persistent Scores Below 80%, by Region

Region	Number of Ships Score Below 80%	Total Ships in the Region	Percentage of Ships Score Below 80%	Average Score
SAN DIEGO	23	42	55%	70%
PACNORWEST	5	7	71%	68%
HAWAII	6	8	75%	63%
JAPAN	4	17	24%	71%
CNSP Total	38	74	51%	68%

The findings reveal that Hawaii had the highest percentage of consistently noncompliant ships at 75%, followed by PACNORWEST at 71%, San Diego at 55%, and Japan at 24%. However, despite this, Japan maintained the highest average compliance score of 71%, while Hawaii had the lowest at 63%. Overall, the CNSP total indicates that approximately 51% of ships faced compliance challenges, with an average score of 68%. This analysis suggests a lack of conformity to GCPC standards across regions, potentially indicating that Japan and Hawaii may employ different practices compared to the rest.

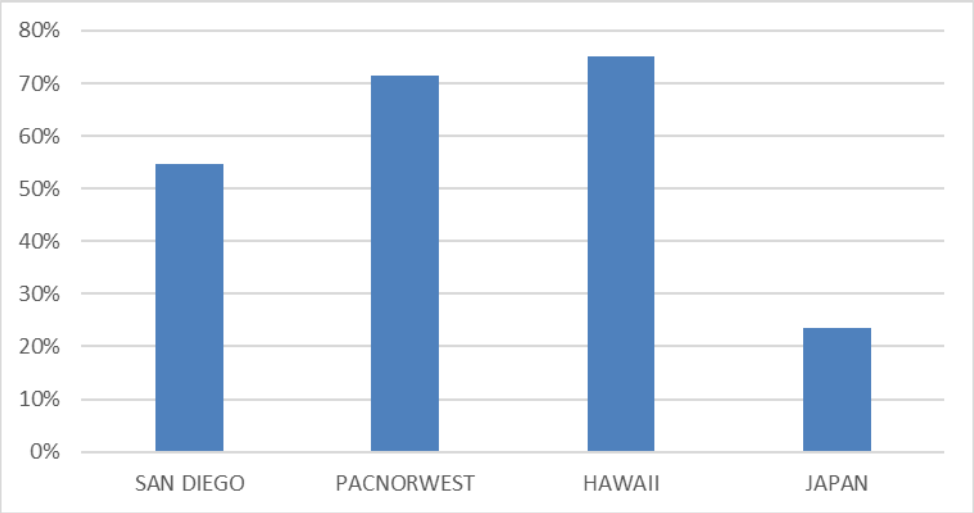


Figure 13. Percentage of Ships With Persistent Scores Below 80%, by Region

3. Discussion of Quantitative Findings

The qualitative findings provide valuable insights into the performance and compliance status of ships within CNSP across different regions. Following is a discussion based on the identified trends and analyses:

(1) Finding 1: Regional Variances in Probation Status

The analysis revealed significant regional disparities in the percentage of ships on probation as shown in Figure 9 and Figure 10.

- **PACNORWEST**: Due to having the highest percentage of ships on probation at 43%, this region may need targeted interventions to address compliance issues.
- **Japan**: Although Japan had the lowest percentage of ships on probation at 12%, the larger total number of ships resulted in a considerable absolute number of ships on probation. This finding indicates a need for continued attention to compliance despite the seemingly lower percentage.
- **San Diego**: Emerging with both the largest absolute number of ships on probation and a significant percentage on probation, San Diego faces a concentrated compliance issue that requires urgent attention and intervention.

- **Hawaii:** Falling between San Diego and PACNORWEST in terms of probation percentage suggests a moderate level of compliance in this region. However, there is still room for improvement to ensure better adherence to compliance standards.

(2) Finding 2: Compliance Rates Over Time

Compliance rates varied across quarters and locations according to Table 9 and Figure 11.

- **San Diego:** Despite consistently having the highest number of vessels, compliance rates fluctuated. This suggests that factors impacting compliance may be dynamic and subject to change over time in this region.

- **PACNORWEST:** This region showed wide variations in compliance rates, with improvements in some quarters but declines in others. The fluctuations indicate a need for continuous monitoring and targeted interventions to maintain or improve compliance levels.

- **Hawaii:** Compliance rates in Hawaii remained relatively stable over the quarters, with occasional peaks and dips but no significant fluctuations. This suggests a consistent level of adherence to compliance criteria in this region, with potential room for further improvement.

- **Japan:** Maintaining consistently high compliance rates throughout the quarters, Japan demonstrated strong adherence to compliance criteria. This suggests effective compliance management practices are in place, indicating a potential model for other regions to emulate.

(3) Finding 3: Relation Between Average Score and Support from ATG

The analysis of support ratios across different locations as shown in Table 14 revealed that Hawaii has a notably higher support ratio compared to others; 1 ATG auditor supervises 2 ships in comparison to both San Diego and PACNORWEST, where 1 ATG auditor supervises 7 ships. Japan has a ratio of 1 auditor to support 6 ships.

Table 14 compares average score by region to this level of support.

Table 14. Relation Between Compliance and Support from ATG

Region	Level-of-Support Ratio	Average Score
SAN DIEGO	1:7	87%
PACNORWEST	1:7	82%
HAWAII	1:2	91%
JAPAN	1:6	95%
CNSP Total	1:5	84%

The results suggest that the level of support provided to ships does not necessarily directly correlate with their compliance scores. Despite Japan's ships receiving a medium level of support, they achieved the highest score of 95%, indicating that factors beyond support levels may influence compliance. Conversely, Hawaii's ships received the highest level of support of 1:2 but achieved only slightly higher than the CNSP average at 91%, suggesting that other factors may be contributing to their compliance performance.

(4) Finding 4: Identification of Good Practices and Persistent Failure

The identification of ships with consistently high compliance rates, as shown in Table 12, underscores Japan's exemplary performance and suggests more effective management of the GCPC program compared to other regions. Conversely, the analysis of ships with persistent noncompliance issues highlights Hawaii as the region with the highest percentage of noncompliant ships. This suggests a need for targeted interventions and support measures to address compliance challenges in Hawaii and potentially learn from Japan's successful strategies for improving compliance.

Overall, the quantitative findings present insightful perspectives on the performance and compliance status of ships within CNSP across diverse regions. The analysis unveils notable regional disparities in probation percentages, with PACNORWEST exhibiting the highest proportion of ships on probation, while Japan displays the lowest but with a substantial absolute number. San Diego experienced concentrated compliance issues, whereas Hawaii demonstrated a moderate level of compliance potential for enhancement. Compliance rates fluctuate over time, with San

Diego experiencing volatility, PACNORWEST witnessing a varied performance, Hawaii maintaining stability, and Japan consistently demonstrating strong compliance adherence. Additionally, the relation between compliance scores and support ratios indicates that support levels do not invariably align with compliance outcomes, suggesting nuanced influences. Japan's exemplary compliance performance contrasts with Hawaii's challenges, calling for targeted interventions and learning opportunities to enhance compliance across regions. However, it is important to note that while quantitative data provides valuable insights, qualitative results complement the understanding of the CNSP GCPC program, offering a more comprehensive picture.

B. QUALITATIVE ANALYSIS

The qualitative analysis involved gathering opinions from key stakeholders of the CNSP program, consolidating these perspectives, and analyzing them.

1. Description of Qualitative Data Collected

Data collection for the CNSP GCPC program encompassed multiple sources throughout the chain of command. Particular emphasis was placed on HL5, where GCPC compliance issues often arise, as well as HL4 and 4.5, which offer support and oversight within CNSP. Various methods, including phone calls, face-to-face meetings, and emails, were employed for interviewing key stakeholders. These stakeholders included 10 ship A/OPCs, auditors at four ATGs, CNSP data analysts, CNSP GCPC staff, PACFLT data analysts, and NAVSUP CCPMD data analysts. Survey data were compiled into a single file for analysis, detailed in Appendix D. Thematic analysis was then employed to identify codes and themes relevant to the research questions, providing deeper insights into the operational dynamics of CNSP GCPC management.

At HL5, the organizational tier of the GCPC program, my focus was on six key components: A/OPC, A/BO, CH, RPPOs, IOP, and Training and Compliance. Sampling interviews with key stakeholders from 10 ships across all regions, including Hawaii, San Diego, Pacific Northwest, and Japan, provided a demographic representation of the Pacific Fleet.

2. Presentation of Qualitative Findings

Using thematic analysis, I grouped the interview answers into the following 11 themes.

(1) Theme 1: The Significance of GCPC

I delved into the significance of utilizing the GCPC on the ship. My analysis revealed that GCPC is universally recognized as a critical program:

- GCPC was regarded as a crucial program within the Supply Department by nine out of 10 vessels, scoring a 9/10 in importance.
- None of the vessels (0/10) were able to meet 100% of their requirements without GCPC.
- All vessels (10/10) engaged in a minimum of 5 transactions per month through GCPC.

Despite their reliance on GCPC, ships utilized only a small portion of the GCPC fund compared to the overall ship's operating target (OPTAR) fund. On average, vessels made a minimum of 10 purchases per month through GCPC, collectively amounting to approximately 2% to 3% of the OPTAR. This expenditure remained relatively insignificant when compared to the OPTAR. For example, the USS Samson's (DDG-102) spending for GCPC in FY2023 was $200,000 out of the $8 million OPTAR budget (Respondent #1, interview with author, November 21, 2023).

(2) Theme 2: Purchasing Patterns (Typical Items/Services Bought)

Theme 2 supports Theme 1 by illustrating the importance of fulfilling the materiel and service requirements on the Navy ships. All vessels (10/10) utilized GCPC for procuring supplies and services that were unavailable through the Navy supply system.

- One vessel out of 10 (1/10) made purchases for time-sensitive items, indicating occasional urgent needs (e.g., items available in the Navy catalog but not currently in stock).

- Emergency items (e.g., COVID purchases) were consistently procured by all vessels (10/10) through GCPC.

- Emblematic items specific to the commands, such as command ball caps and culinary specialist uniforms, were purchased by all vessels (10/10) through GCPC.

- Additionally, all vessels (10/10) utilized GCPC for acquiring services that were not offered by NAVFAC, such as scissor lifts, Conex boxes, and freezers.

This analysis uncovered that a significant majority (90%) of GCPC transactions involved acquiring items not listed in the Navy catalog, encompassing non–National Stock Number (NSN) items, organizational insignias, office supplies, and clothing. However, I observed instances of potential ambiguity in purchasing, such as acquiring JLG scissors, refrigerated Conex boxes, and hazardous materials. Such purchases required written justifications and approval from the HA to ensure adherence to procurement guidelines. It is clear that GCPC is vital as a means of purchasing that enables ships to carry out their daily functions

(3) Theme 3: Punctuality of GCPC Binder Submission

Submitting ships' GCPC binders to the local ATG for quarterly audit stands as the foremost criterion for compliance with the CNSP GCPC policy. As outlined in Chapter I, ships are mandated to submit their GCPC binder for audit within 14 days following the end of each quarter, covering the periods of October to December, January to March, April to June, and July to September. Failure to meet this deadline results in a score of 0%. In the event of scoring below 80% during the initial audit, ships must return their GCPC binder to the ATG within 21 days for a reaudit. Failure to adhere to this time frame leads to a "probation" status.

- **Binder Submission Delays:** A notable issue arose with binder submissions, as six out of 10 (6/10) vessels encountered delays. This delay

could potentially expose the ship to the risk of violating CNSP GCPC policy and noncompliance.

- **Underway Duties and Shipboard Training:** Half of the vessels (5/10) experienced delays in submitting their binders, primarily attributed to underway duties and shipboard training. These tasks are unique to the maritime environment, emphasizing the challenge of balancing administrative tasks with operational responsibilities.

- **Internet Connectivity Issues:** Delays in binder submission affected three out of 10 (3/10) vessels due to issues with internet connectivity. Such technical difficulties can disrupt communication and hinder information exchange.

- **Limited Time for GCPC Management:** Half of the vessels (5/10) allocated fewer than 5 hours per week to GCPC management, potentially leading to rushed or incomplete administrative tasks and oversight of procurement processes.

- **Persistent Binder Submission Delays:** Six out of 10 (6/10) vessels consistently missed deadlines for binder submission, indicating a systemic issue that requires attention and remediation.

- **Lack of Reported Procedures Analysis:** The status of reported procedures was not available for analysis, highlighting a potential gap in data collection or reporting mechanisms.

- **Punctuality of GCPC binder Submission:** Valid reasons were required for lateness, with ships on patrol/deployment allowed one month after the deadline to submit records. Distribution of punctuality includes 50% on time, 25% late with valid reasons, and 25% late.

In summary, the demanding operational pace of ships posed a recurring challenge to timely report submissions, and along with several additional challenges were identified in Theme 4.

(4) Theme 4: Challenges in Timely Consolidating of GCPC Purchase Documentation

Theme 4 supports Theme 3 by elaborating one of the factors that contributed to timely submission. I examined the reasons that may cause the delay in compiling documentation for the GCPC binder.

- **Expired Quotes and Missing Documents:** Two out of 10 (2/10) vessels encountered issues with expired quotes and missing documents, indicating potential gaps in procurement processes or documentation management.
- **Inadequate Justification:** Half of the vessels (5/10) received inadequate justification for purchases, potentially leading to difficulties in assessing the necessity and appropriateness of transactions.

In light of the average of 10 GCPC transactions per month and the challenges associated with gathering all the required paperwork, this prompt consideration of the complexity of the paperwork requirements raises questions regarding the level of knowledge, attentiveness, and management practices of HL5 participants.

(5) Theme 5: Challenges in Passing ATG Audit 80%

As per the CNSP GCPC policy, quarterly submission of the GCPC binder on time and grading of the GCPC binder serves as the primary means for evaluating the compliance of the vessels' GCPC programs. In Section A, I discussed timely submission, while here, I focus on achieving a passing score. Reviews conducted by the ATG involve a meticulous examination of all open purchase transactions in the GCPC binder, providing feedback and assigning scores accordingly. Vessels that receive three consecutive unsatisfactory reviews, scoring below 80%, face the risk of suspension for four quarters by the CNSP. However, vessels have the opportunity to improve their scores by rectifying errors.

Insights from Level 4.5 ATG auditors shed light on common causes of failed grades in GCPC binders. Participants cited issues like improper screening of mandatory sources such as NAVFAC, Defense Automatic Printing Service (DAPS), and hazardous materials (HAZMAT), incorrect certification of the line of accounting (LOA) or fund usage, and noncompliance with Financial Improvement and Audit Readiness (FIAR) standards. Other concerns included purchasing NSN items without valid justification, lack of itemized invoices, and missing documentation like the NAVSUP Form 306 (sub-custody form) and the National Defense Authorization Act form (NDAA form). Other reasons include:

- noncompliance with FIARs
- incomplete or illegible names and prints on documentation
- missing documentation for hazardous material (HAZMAT) purchases
- incorrect use of LOA
- failure to screen mandatory sources for procurement
- certification errors regarding LOA or fund usage
- incorrect adherence to FIAR compliance standards
- absence of itemized invoices for transactions
- expired training certificates for personnel involved in procurement
- inadequate maintenance of purchase card logs

These findings underscored the importance of meticulous attention to detail, adherence to procurement regulations, and continuous training and oversight to mitigate risks and ensure compliance in GCPC management.

(6) Theme 6: Training Method and Frequency

Theme 4 prompts inquiries into the participants' level of knowledge. Within this theme, I explored the training practices influencing participants' understanding. The

analysis revealed a decentralized approach, wherein each vessel managed its training independently. Consequently, this approach yielded a diverse landscape, with vessels employing individually tailored methods and differing levels of reliance on centralized resources.

- All vessels (10/10) conducted their training based on individually customized IOPs, suggesting a tailored approach to training management.
- The majority of vessels (6/10) did not utilize the CNSP SharePoint platform, which contains the most recent GCPC policies and guidelines and is managed and updated by CNSP GCPC staff for training-related activities. This suggests a potential communication gap, as the ship's personnel may not be aware of these tools.
- Two out of 10 vessels (2/10) mentioned utilizing the PCAN review process for training evaluation.
- One out of two (1/2) vessels expressed confusion regarding the PCAN process, highlighting potential challenges in understanding and navigating training evaluation procedures.
- Two out of 10 vessels did not seek external assistance for training-related issues, indicating a potential lack of resource utilization or knowledge sharing.
- All vessels (10/10) completed the mandatory initial, refresher, and annual training requirements, demonstrating compliance with training mandates. HL2 participants stated, "Ideally, all GCPC participants have their training completed and shown on PIEE; there are Refresher Training (every 2 years), Annual training, and initial training; every training certificate needs to be uploaded for us to see."
- ATG provided additional training upon ship request or for underperforming ships (bi-yearly or annually).

- The status of contact with CNSP data analysis for training evaluation purposes was not available for analysis.

Overall, the analysis revealed significant variability in training practices among vessels, including differences in frequency, topic coverage, and delivery methods. The lack of standardized training protocols from higher echelons and potential challenges in understanding evaluation processes highlight areas for improvement in training management and communication. Additionally, the discrepancy in the utilization of CNSP resources and the reporting of in-house training activities suggests opportunities for enhancing coordination and information exchange within the training framework.

(7) Theme 7: Personnel Rotation Practices

I examined the rotation of personnel in GCPC-related roles, encompassing individuals within the Supply Department, such as A/OPC, A/BO, and CHs, as well as those outside of the Supply Department, such as RPPOs. Findings indicate the following:

- Two out of 10 vessels (2/10) implemented a yearly rotation of CHs, suggesting a frequent turnover of personnel in this role.
- Half of the vessels (5/10) maintained the same CHs for the duration of their tour, spanning over 3 years, indicating a preference for continuity in personnel.
- Three out of 10 vessels (3/10) opted for a rotation of CHs every 2 to 3 years, balancing the need for fresh perspectives with the benefits of experience.
- All vessels (10/10) retained their approving officials (AOs), APC, and HA for the duration of their tour, ensuring consistency and stability in key positions.
- None of the vessels (0/10) reported experiencing issues directly attributable to personnel rotation, suggesting effective adaptation to changes in staffing and responsibilities within the GCPC program.

- Three out of 10 vessels (3/10) noted that the frequent rotation of RPPOs, as their role was not considered a primary duty onboard Navy ship, contributed to GCPC issues.

Personnel rotation appears to have minimal impact on positions within the Supply Department. However, rotation in RPPO positions has been observed to cause delays in gathering GCPC documentation and to prolong the GCPC purchase lead time. An excerpt from an HL5 participant underscores this challenge: "When people get used to the program, everything is good, only when new people join the program, they have to start learning a lot of new things again." This sentiment highlights a significant challenge in the CNSP GCPC program, especially in a military environment marked by high rotation levels.

(8) Theme 8: Policy Awareness and Compliance

I evaluated the clarity and comprehension of GCPC instructions among naval vessels by inquiring whether the interviewees were familiar with the existing GCPC policy and knew where to locate it. This assessment yielded the following insights:

- Two out of 10 (2/10) vessels struggled to stay aligned with updates to higher echelon policies, potentially indicating a gap in communication or understanding.
- All vessels (10/10) demonstrated a comprehensive understanding of the instructions governing GCPC management.
- All vessels (10/10) relied on the CNSP for policy direction regarding GCPC operations.
- All vessels (10/10) exhibited a clear understanding of their roles and responsibilities, ensuring effective separation of duties within the GCPC program.
- Nine out of 10 vessels (9/10) demonstrated an understanding of the probation criteria associated with GCPC management, indicating awareness of performance expectations and consequences.

- All vessels (10/10) possessed knowledge of checklist audits, facilitating compliance with GCPC procedures and regulations.
- One out of 10 vessels (1/10) noted discrepancies between instructions from NAVSUP and CNSP, suggesting potential challenges in interpretation or implementation.
- Three out of 10 vessels (3/10) were aware of the 1-year probation policy for GCPC personnel, indicating varying levels of familiarity with personnel management protocols.
- The vast majority (9/10) of vessels understood the consequences of lateness in GCPC operations, highlighting awareness of accountability and adherence to deadlines within the program.

Overall, this finding revealed a positive trend in the clarity and comprehension of GCPC instructions among naval vessels, including policy direction, roles and responsibilities, probation criteria, checklist audits, and consequences of lateness and other violations. Participants from HL5 shared insights, such as, "Once the Credit Card got suspended, all training needs to be redone. SUPPO, AO, and CHs need to come to the office of Level 4 HA with all the program binders, all the newly completed training, and proof of all reports submitted on time to reinstate the program."

While some vessels identified inconsistencies between instructions from various authorities, indicating potential areas for alignment and clarification, the majority showcased a solid understanding of GCPC instructions. This poses a contradiction with the high level of compliance observed in quantitative analysis findings, implying that disciplinary actions may not be sufficiently severe.

(9) Theme 9: Improvements

A common theme among interviewees was the opportunity for improvement as described below:

- Reducing the frequency of suspension and probation measures can promote adherence to CNSP policy, preventing work stoppages due to the inability to make purchases using GCPC.
- Streamlining processes can simplify operations while integrating administrative grading into the checklist can provide a comprehensive evaluation. Two respondents from HL5 and one respondent from HL3 offered the following specific ideas for streamlining processes (see Appendix D for full responses from all interviewees):
    - Respondent #2: Reduce the number of websites required for GCPC reporting (IOD, USBank, PIEE, ATG grading). When ships are underway, websites often fail to load, leading to misperceptions of ship inactivity by CNSP.
    - Respondent #3: Eliminate outdated policies that no longer align with the schedules and operations of modern 21st-century ships. Although it is now 2023, many policies are still based on guidelines from the 1990s.
    - Respondent #16: Few people are aware of the NAVSUP 4200.99D, and there are multiple layers of guidance from FAR, DFAR, and local command or level IOP guidance. We need a one-stop shop for training to simplify and centralize all this information.
- Exploring alternative procurement avenues, such as shore support purchasing for ships, may alleviate reliance on GCPC. Assigning the disbursing officer (DISBO) as an approving official (AO) could optimize oversight.
- Additionally, implementing awards to recognize outstanding GCPC program management can incentivize excellence.

- Suggestions for process improvement include revamping instructions and reinforcing penalties.

- Other suggestions include applying available technology or even trending technology in managing the GCPC program. HL3 interviewee observed the following:

- Respondent #7: The U.S. Bank APC support hotline operates during CONUS business hours, which do not align with our overseas unit's business hours. As a result, our cards often get declined in urgent situations when the APC hotline is closed. I recommend extending the APC hotline business hours to 24/7 to address this issue.

- Respondent #16: U.S. Bank offers a direct ordering function that has not yet been utilized… To modernize the GCPC program, implement a cellphone app and update technology to include mobile banking. Innovate the process specifically for ships, as their connectivity is not as reliable as that of shore commands.

In conclusion, interviewees highlighted several opportunities for improvement within the GCPC program, including reducing the frequency of suspension and probation measures, streamlining processes, exploring alternative procurement avenues, and implementing awards for outstanding program management. Suggestions for process improvement, utilization of available technology, and modernization of the GCPC program were also emphasized. Addressing these areas of improvement can enhance efficiency, effectiveness, and compliance within the GCPC program.

(10) Theme 10: Training for Auditors at ATGs

In examining the training methods for auditors at various ATG locations across the Pacific, interviews revealed a diverse array of sources contributing to auditors' knowledge and expertise in GCPC binder grading. These include:

- hands-on training
- experience-based learning
- PQS at ATG
- on-the-job instruction
- guidance/notice from CNSP data analyst
- PCAN training
- DAU courses
- CCPMD course
- knowledge passed down from more experienced auditors
- checklist training
- the requirement for small ship experience

ATG auditor grading lists utilized include:

- consistency in the GCPC checklist application
- the ATGPAC GCPC and FEDMALL programs' monthly audit checklist
- the 2023 ATGPAC checklist
- the 5040.1D for self-assessment

While ATG auditors adhere to established policies and guidelines for grading GCPC binders, the absence of standardized knowledge could result in potential inconsistencies or lack of uniformity across all ATGs. This challenge may influence the fluctuation of grading across regions, as indicated by trends observed in quantitative analysis in Section A of this chapter.

(11) Theme 11: Sources of Help and Response Time

All 10 ships (10/10) reported no issues in receiving assistance from CNSP GCPC staff via email. Feedback from a CNSP GCPC data analyst for inquiries typically takes 24 to 48 hours, though it may be instant via phone call or email to a local ATG auditor. However, a Level 5 participant suggested extending the business hours of ATG to support ships in submitting the GCPC binders on time.

3. Discussion of Qualitative Findings

Seven key findings emerged from my review, focused on the following areas: Policy and Communication, Governance and Structure, Training and Compliance, Central Instruction and Report, Software and Platforms, Areas for Improvements, and Probation Criteria.

(1) Finding 1: Policy and Communication

The qualitative analysis revealed that policies within GCPC programs are regularly updated and disseminated to stakeholders via email and phone calls. However, a notable concern emerged regarding the lack of a systematic approach to ensure all ships receive these crucial messages. This disparity highlighted a potential gap in communication channels, which could hinder the timely and effective implementation of policies across the CNSP.

(2) Finding 2: Governance and Structure

My qualitative exploration illuminated the multitiered structure of program governance within GCPC initiatives. Key personnel, such as Level 4 HA, assistant HA, and analysts, play pivotal roles in overseeing and managing program operations. This hierarchical governance model ensures clear lines of authority and accountability, thereby facilitating efficient decision-making processes and program implementation.

(3) Finding 3: Training and Compliance

Qualitative findings underscored the significance of training in maintaining compliance within GCPC programs. Training protocols typically involve reading

instructions and adhering to PCANs. Additionally, the process for exiting probation and suspension was elucidated, highlighting the importance of sustained compliance over consecutive quarters and the subsequent remedial actions required for reinstatement.

(4) Finding 4: Central Instructions and Reporting

A notable gap identified through qualitative analysis pertains to the absence of centralized instructions for the entire GCPC program. While reporting mechanisms exist through SharePoint trackers and master trackers from ATG, the lack of centralized instructions may pose challenges in ensuring uniformity and consistency in program implementation and compliance monitoring across the CNSP.

(5) Finding 5: Software and Platforms

Qualitative insights revealed the diverse array of software and platforms utilized within GCPC programs, including USBank, IOD, and PIEE. This array underscores the technological complexity inherent in program operations and highlights the need for effective integration and interoperability among various platforms to streamline processes and enhance efficiency.

(6) Finding 6: Areas for Improvement and Potential Issues

The qualitative analysis identified several areas for improvement within GCPC programs. Suggestions included the revision of instructions and the reinforcement of penalties to strengthen compliance mechanisms. Additionally, risks associated with challenges in personnel transitions and program familiarity were acknowledged by the interviewees.

(7) Finding 7: Probation Criteria

Qualitative findings elucidated the criteria for ships to be placed on probation within GCPC programs, which include late certification and low ATG grading. This qualitative insight underscores the significance of adherence to established criteria in maintaining program integrity and ensuring compliance with regulatory standards.

In summary, the qualitative findings provided valuable insights into the operational dynamics, challenges, and areas for improvement within GCPC programs. These insights served as a foundation for the formulation of targeted interventions and strategic recommendations in Chapter V, aimed at enhancing program effectiveness and mitigating noncompliance risks within the CNSP.

C. INTEGRATION OF QUANTITATIVE AND QUALITATIVE FINDINGS

I applied concurrent parallel design methods to integrate findings from qualitative and quantitative analyses.

Quantitative data revealed a concerning average 43% noncompliance rate at the first submission in each quarter, indicating a significant problem within the program (Table 9). While some ships demonstrate proficiency, the majority struggle to meet this standard consistently. The timely submission of the GCPC binder for audit and reaudit, as well as achieving passing grades, emerged as a crucial contributor to compliance. Understanding the root causes of noncompliance is imperative. Firstly, issues with timely submission may stem from various factors, such as shipboard environment and human factors. Secondly, challenges leading to passing grade issues may involve discrepancies in understanding policies, incomplete documentation, or certification errors.

Qualitative findings further elaborate on these issues using thematic analysis. The significance of the GCPC on the vessels was evident, with GCPC being universally recognized as critical for procurement needs. Purchasing patterns revealed a reliance on GCPC for non-Navy stocked items and time-sensitive purchases. The punctuality of GCPC Binder submission emerged as a key evaluation metric, with various challenges identified, including compliance with higher echelon policies, binder submission delays, and limited time for management.

Common issues leading to failed grades in GCPC binders included noncompliance with financial standards, incomplete documentation, and errors in procurement processes. Policy awareness and compliance were generally high, although discrepancies between instructions from different authorities were noted. Additionally, the rotation of personnel

within the Supply Department and policy communication were highlighted as areas needing attention.

D. CONCLUSION

In this chapter, a mixed-method approach combining quantitative analysis with qualitative insights was employed to comprehensively explore trends, challenges, and potential improvements within the CNSP GCPC program. Quantitatively, the analysis revealed significant regional variances in probation status and fluctuations in compliance rates over time. Moreover, the relation between support levels and compliance scores underscored nuanced influences on compliance outcomes. Additionally, the identification of good practices and persistent challenges highlighted areas for targeted interventions. Qualitatively, seven key findings were unearthed, ranging from policy dissemination to governance structure, training, and software integration. These findings provided a holistic understanding of operational dynamics and areas for enhancement within GCPC programs. By integrating both quantitative and qualitative findings, Chapter V offers summarized insights and strategic recommendations to bolster the effectiveness of the CNSP GCPC program, aligning with the overarching goal of continuous improvement and regulatory compliance.

V. FINDINGS AND RECOMMENDATIONS

This capstone project tackled the pressing need to improve compliance within the GCPC program implemented by the CNSP. It endeavored to establish a comprehensive framework across all organizational echelons, fostering robust communication channels and effective change management strategies to reduce instances of noncompliance. By evaluating the sustainability of the GCPC program through the lens of change management, this research sought to catalyze a transformative shift in GCPC management approaches.

This chapter serves as the culmination of this study, presenting the results of data analysis and offering actionable recommendations to address research objectives. By identifying patterns, trends, and themes in the data, this chapter contributes to the existing body of knowledge and offers recommendations based on its findings to guide future action, policy development, and research endeavors.

A. DISCUSSION OF FINDINGS

The main challenges associated with the GCPC program within CNSP that lead to noncompliance aboard ship fall into the following ten categories: internet connectivity in shipboard environment, lack of focus on GCPC management onboard ships, lack of accountability in the ships' GCPC program management, maintaining a current level of knowledge regarding policy and guidance changes, high RPPO turnover rate, dispersion of multiple policies and guidance, inconsistent grading criteria, ATG business hours, auditing and reporting problems, and GCPC administrative burden.

1. Challenge 1: Internet Connectivity in Shipboard Environment

Maintaining reliable internet connectivity on ships navigating the global seas is crucial for promptly and efficiently collecting essential documentation for GCPC purchases. This challenge is particularly pronounced compared to shore-based commands, which benefit from stable infrastructures and lack the logistical hurdles of constant movement across diverse geographic regions. Even during port stays, the risk of onboard

internet downtime remains, potentially causing delays in acquiring the necessary documents.

Improving shipboard internet connection in the challenging maritime environment presents several obstacles, including the impossibility of running physical cables to moving ships and the limited availability of cell towers. The variability in internet speed on U.S. Navy ships can be attributed to the diverse methods of transmission utilized over the years, ranging from high-frequency (HF) ham radio to satellite communications. While some ships may have access to super high-frequency (SHF) satellite communications equivalent to two T1 lines, others rely on technologies like Inmarsat-B HSD, which offer only limited channels and bandwidth allocation.

2. Challenge 2: Lack of Focus on GCPC Management Onboard Ships

Due to the relatively low budget allocation—typically around 3% of OPTAR—GCPC management often does not receive as much attention as other financial programs such as OPTAR and Depot Level Repairable (DLR). This lack of focus can result in insufficient resources and support for effective GCPC oversight and management.

Additionally, the demands of GCPC management must contend with competing priorities such as watch duties, drills, and general quarters aboard the ship. These competing demands place significant strain on GCPC operations, potentially leading to delays, oversights, or inefficiencies.

3. Challenge 3: Lack of Accountability in the Ships' GCPC Program Management

Within the operational framework of ships, the GCPC is administered by A/OPCs acting on behalf of the HA. However, a critical concern arises from a lax approach to disciplinary measures within this structure. Instances of tardiness in submission, failure to meet grade standards or probationary issues are typically reported to the AOPCs rather than directly to the HA. Consequently, the consequences of such infractions, including suspension, are well understood by the AOPCs, yet there is often a lack of awareness or oversight from the HA. This knowledge gap between AOPCs and the HA can lead to leniency in addressing disciplinary issues, perpetuating a cycle of negligence.

Furthermore, when a ship's GCPC program is on probation or suspension, the responsibility for making corrections and rectifying the situation falls on the AOPCs. This highlights a lack of accountability in the ship's GCPC program management.

4. Challenge 4: Maintaining a Current Level of Knowledge Regarding Policy and Guidance Changes

In the ever-evolving GCPC program, frequent instruction updates from CNSP GCPC staff via email are common. However, ensuring that these emails are thoroughly read and understood by all GCPC program participants is not guaranteed. This makes it challenging for individuals to stay abreast of the necessary knowledge to perform their roles accurately.

5. Challenge 5: High RPPO Turnover Rate

Supply personnel assigned to GCPC duties experience fewer rotations, resulting in less disruption to their level of knowledge and expertise. Conversely, unlike their counterparts in the Supply Department, RPPOs may not consistently receive the necessary training to excel in their roles. Moreover, RPPO positions are commonly considered collateral duties on ships, adding to the challenge as sailors with primary responsibilities elsewhere rotate more frequently. This frequent turnover necessitates regular and comprehensive training to ensure RPPOs maintain proficiency in their duties. While supply personnel enjoy greater stability in their roles, RPPOs face higher turnover rates and require ongoing support to effectively fulfill their responsibilities.

6. Challenge 6: Dispersion of Multiple Policies and Guidance

The GCPC program is subject to frequent updates and additions, resulting in a cumulative expansion rather than a streamlining of resources. This continuous influx of information necessitates ongoing knowledge upgrades for current participants, while newcomers face the challenge of catching up swiftly. Additionally, the dispersion of multiple policies and guidance across various sources compounds the difficulty for participants in navigating and consolidating this wealth of information.

7. Challenge 7: Inconsistent Grading Criteria

Survey results indicate a concerning trend: ships often encounter difficulties passing GCPC inspections when transitioning between different home port locations. This inconsistency in inspection outcomes was because of a variance in grading criteria and possible different interpretations of grading criteria of auditors across locations. For example, a ship's GCPC score can change substantially after being graded by an ATG auditor in a new home port following a home port shift.

8. Challenge 8: ATG Business Hours

According to the survey findings, support from Level 4 CNSP and Level 4.5 ATG has been highly satisfactory. Queries related to GCPC matters are typically addressed promptly, with turnaround times ranging from 24 to 48 hours, contingent on location. However, a notable concern emerged regarding short ATG business hours or early closing times, which can pose challenges for ships attempting to submit their GCPC binders.

9. Challenge 9: Auditing and Reporting Problems

Current data mining for GCPC primarily focuses on flagging training requirements, unauthorized purchases, and the timeliness of certifying transactions. However, this system cannot capture the adequacy of documentation and the timeliness of submitting the GCPC binder for grading. As a result, important aspects of compliance and procedural adherence may not be adequately monitored or assessed.

10. Challenge 10: GCPC Administrative Burden

GCPC purchases involve a more extensive process and documentation compared to the procuring of NSN items. For instance, a typical checklist for a GCPC purchase typically comprises eight sequential steps that must be completed. These steps often include various stages, such as requisition approval, vendor selection, contract negotiation, and final authorization. In contrast, NSN items, which are standardized products identified by number, usually entail simpler procurement procedures with fewer administrative requirements. The GCPC process seems too complicated.

B. RECOMMENDATIONS

The following 10 recommendations are proposed for the GCPC program in CNSP to address the challenges identified above.

(1) Recommendation 1: Improve the shipboard internet connection.

To address these challenges and enhance shipboard internet connectivity, several strategies can be explored. Firstly, investing in advanced satellite communication technologies capable of providing reliable and high-speed internet access to ships across different regions of the ocean would be beneficial. Additionally, implementing a unified and standardized system for internet transmission, regardless of the ship's location or deployment, could streamline communication processes and ensure consistent connectivity.

Furthermore, optimizing encryption and decryption processes to minimize bandwidth overhead and reduce delays in data transmission could help improve internet speed onboard. Additionally, exploring innovative solutions such as automated surveillance detection systems to ensure the security and integrity of shipboard communications without compromising internet performance could be valuable. Improving internet connectivity speeds up processes, making documentation collection easier, streamlining GCPC management tasks, and enhancing productivity to ensure timely submission of the GCPC binder.

(2) Recommendation 2: Clearly articulate the strategic importance of the GCPC program.

The strategic importance of the GCPC program in achieving ship objectives should be communicated. Its contribution to broader goals should be emphasized, even if its financial impact seems small compared to other initiatives. Highlighting the GCPC's role in enhancing efficiency, improving processes, or supporting critical functions can help justify its importance.

Additionally, the GCPC program's objectives should be aligned with broader ship priorities. The HA should emphasize that it supports key strategic initiatives, addresses

critical needs, or fills gaps in existing capabilities. Aligning its goals with those of higher-dollar programs can help justify its importance in the overall portfolio of initiatives.

(3) Recommendation 3: Enhance education and awareness about disciplines.

To address the compliance issue effectively, it is imperative to enhance education and awareness among HAs regarding the disciplinary protocols and consequences within the GCPC program. By ensuring that HAs are fully informed about the ramifications of disciplinary actions, including suspension, they can exercise greater accountability and oversight over the program. Additionally, a system of accountability must be established wherein the HA assumes responsibility for incidents of negligence or noncompliance within the GCPC program. Holding HAs accountable for program integrity fosters a culture of diligence and ensures that disciplinary measures are consistently applied and enforced.

It is also imperative to raise awareness and engage participants including the AOPC, AO, CHs, and RPPOs in discussions about the importance of the GCPC program. Their input should be solicited and their concerns addressed. Demonstrating broad support and buy-in can strengthen the case for prioritizing the program despite its lower dollar amount.

(4) Recommendation 4: Train personnel effectively.

To bridge the training and turnover gap for key stakeholders including CHs and RPPOs in the GCPC process, a multifaceted strategy is essential. Firstly, enhanced training programs should be prioritized, encompassing tailored and standardized protocols specifically designed for RPPOs engaged in GCPC operations. These programs should include regular sessions covering GCPC procedures, documentation requirements, and vendor management, employing a mix of in-person workshops, online modules, and practical exercises. Additionally, mentorship initiatives pairing experienced RPPOs with newcomers can provide ongoing guidance and support.

Secondly, effective rotation management strategies are crucial. A balanced rotation schedule accommodating RPPOs' dual responsibilities should be devised, with consideration given to longer durations for RPPOs in GCPC roles to minimize turnover

and ensure process continuity. Clear communication channels between RPPOs and supervisors are vital for managing workload allocation and setting rotation expectations. Furthermore, recognition and incentives play a pivotal role in motivating RPPOs, highlighting their contributions, and fostering a culture of appreciation. Providing incentives such as commendations, awards, or professional development opportunities can further encourage RPPO excellence. Additional support, such as access to specialized training or task-streamlining tools, can enhance RPPO effectiveness and satisfaction.

Lastly, a commitment to continuous improvement is essential. Regular feedback mechanisms gathering input from RPPOs and stakeholders allow for the identification of process inefficiencies and training gaps, fostering a culture of ongoing learning and innovation. Implementing these comprehensive solutions can address RPPO challenges, enhance training consistency, reduce turnover rates, and ultimately improve procurement operations' effectiveness and efficiency.

(5) Recommendation 5: Centralize the policy and guidance system.

To address these issues effectively, it is advisable to consolidate all relevant knowledge into a single, centralized system. By establishing a unified repository for policy and guidance, participants can access comprehensive information in one convenient location. This consolidation streamlines the process of knowledge acquisition and ensures consistency in understanding across all levels of participation. Furthermore, it facilitates ease of navigation and reference, thereby enhancing efficiency and reducing the likelihood of oversight or misinterpretation. Ultimately, the implementation of a centralized knowledge management system promotes coherence, accessibility, and effectiveness within the bureaucracy's policy and guidance framework.

(6) Recommendation 6: Standardize the grading process.

Recommendation 6 is to standardize the grading process by implementing a universal checklist and form. By adopting a single standard checklist and form, regardless of location, ships can better understand and meet the requirements for successful inspections. This approach promotes consistency and clarity in assessment criteria,

reducing the likelihood of discrepancies between inspections conducted at different home ports.

Furthermore, cross-training graders among various ATGs enhances expertise and fosters a comprehensive understanding of inspection protocols, promoting adaptability and standardization in grading practices across locations.

(7) Recommendation 7: Improve ATG assistance.

To address the challenge of submitting the ship's GCPC binders to the ATG auditors on time, a collaborative effort should be established between ships and ATG to ensure timely submission of GCPC binders. One proposal from Level 5 participants during interviews suggested extending ATG's business hours to accommodate binder submissions by ships. Another solution involves allowing ships to submit their GCPC binders directly to ATG staff duty officers, providing accessibility and assistance even outside regular operating hours.

Local ATGs should conduct regular GCPC training through various formats such as in-person symposiums, virtual sessions, video training, and pre-deployment briefings. These initiatives mitigate the risk of insufficient training and ensure that all ships' GCPC participants receive the latest knowledge and adhere to standards despite high personnel rotation.

(8) Recommendation 8: Improve the auditing and reporting processes.

To address the shortcomings in the current audit and reporting process for GCPC, a comprehensive solution could involve the following actions:

- **Enhanced Data Mining Algorithms** should be developed and implemented, capable of flagging training requirements and unauthorized purchases, and capturing the adequacy of documentation and timeliness of GCPC binder submission.

- **Integration of Additional Metrics** is necessary, expanding the audit scope to include indicators related to documentation adequacy and

submission timeliness, encompassing criteria for completeness, accuracy, and adherence to deadlines.

- **Automated Monitoring Systems** could be deployed to track key metrics in real-time, facilitating proactive identification and resolution of compliance issues.

- **Regular Audits and Reviews** are essential, conducted by designated teams trained in compliance assessment, ensuring adherence to procedures and requirements through a thorough evaluation, particularly focusing on documentation adequacy and submission timelines.

(9) Recommendation 9: Streamline the GCPC process.

To address the challenges posed by the complexity of GCPC purchases compared to NSN items, a multifaceted approach can be adopted. First, streamlining GCPC procurement processes involves evaluating current procedures and refining requisition approval processes, vendor selection criteria, and contract negotiation procedures to alleviate administrative burdens and enhance overall efficiency.

Simultaneously, standardizing the GCPC procurement checklist provides a structured framework delineating sequential steps necessary for completing purchases. This standardization ensures consistency and clarity in executing GCPC transactions, mitigating the risk of errors or oversights throughout the procurement process.

Moreover, leveraging automation tools for GCPC procurement workflow significantly expedites processes and reduces manual intervention. Automated approval workflows, electronic vendor selection processes, and digital contract negotiation platforms contribute to streamlining operations and enhancing speed and efficiency in procurement activities.

Investing in training and capacity-building programs for personnel involved in GCPC procurement is crucial. Equipping staff with the necessary knowledge and skills, including proficiency in procurement software usage, understanding contractual requirements, and effective vendor communication, empowers them to navigate the

procurement landscape efficiently. Expanding training initiatives through various methods such as classroom sessions, symposiums, or teleconferences reinforces understanding and emphasizes adherence to disciplinary guidelines, ensuring compliance with program standards and mitigating disciplinary infractions.

Establishing robust oversight mechanisms ensures compliance with procurement regulations and procedures. Regular audits, reviews of procurement practices, and enforcement of accountability measures promote adherence to established guidelines and mitigate risks of noncompliance. Proactive steps, such as incorporating additional training or warnings regarding disciplinary thresholds, are recommended to address this issue.

(10) Recommendation 10: Improve communication and collaboration.

Finally, fostering improved communication and collaboration among stakeholders involved in GCPC procurement is essential. Enhanced coordination and alignment of efforts among procurement officers, requisitioners, vendors, and contracting personnel facilitates the identification and resolution of potential bottlenecks, contributing to smoother procurement processes overall. Periodic symposiums between Level 4 and 4.5 graders provide an opportunity for knowledge sharing and alignment of inspection practices, ensuring uniformity in assessment methods and addressing challenges effectively.

C. RECOMMENDED CHANGE STEPS

Drawing upon the principles of evolutionary change, I outline a comprehensive plan with seven specific change steps tailored to address identified challenges and ensure compliance for ships within CNSP. Figure 14 shows the seven steps.

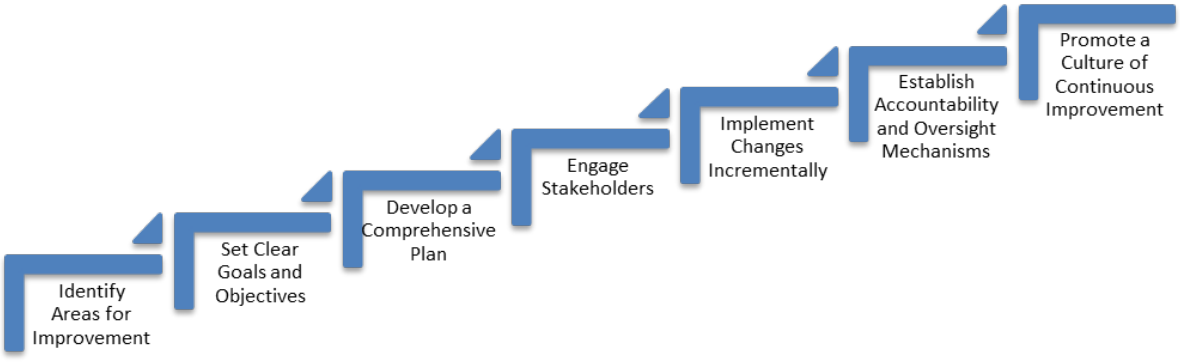


Figure 14. Change Steps

(1) Step 1: Identify areas for improvement.

This step has three phases: Assessment, Data Analysis, and Identification of Key Challenges.

1. **Assessment:** Conduct an in-depth assessment of the GCPC program within CNSP, focusing on areas susceptible to noncompliance, including the timeliness of GCPC binder submissions and document accuracy. Initiate the process by comprehensively evaluating the program's current status and gathering data on compliance rates, historical incidents of noncompliance, and stakeholder feedback. Analyze processes, systems, performance metrics, stakeholder input, and best practices to accurately identify specific challenges.

2. **Data Analysis:** Employ analytical tools like process maps; strengths, weaknesses, opportunities, and threats (SWOT) analysis; and root cause analysis to thoroughly examine processes, systems, performance metrics, stakeholder feedback, and best practices. This analysis aims to pinpoint specific areas requiring improvement with precision, facilitating targeted interventions.

3. **Identification of Key Challenges:** Through assessment and data analysis, pinpoint key areas prone to noncompliance, such as procedural gaps, insufficient training, communication breakdowns, or ineffective oversight

mechanisms. These insights serve as the foundation for addressing critical challenges and implementing tailored improvement strategies.

(2) Step 2: Set clear goals and objectives.

The next step involves setting a specific, measurable, achievable, relevant, and time-bound (SMART) goal (Haughey, 2014) aimed at improving compliance rates and ensuring adherence to CNSP GCPC policies and procedures for the ships. It is important to specify measurable targets and establish clear timelines for reaching compliance milestones. These targets should be aligned with broader CNSP objectives to ensure that they effectively contribute to the organization's overall mission and vision.

For instance, a goal might be to "achieve a 20% reduction in noncompliance rates within the CNSP GCPC program over the next six months by enhancing training effectiveness and implementing stricter oversight measures." This goal serves as a change vision, which is the guiding beacon driving toward a culture of greater compliance, efficiency, and accountability.

(3) Step 3: Develop a comprehensive plan.

The next step is to build a comprehensive action plan that delineates specific steps, required resources, realistic timelines, and clearly defined responsibilities to effectively tackle the challenges identified in Step 1. The action plan should be detailed yet flexible enough to accommodate any unforeseen circumstances or adjustments that may arise during implementation.

I conducted a thorough risk assessment to identify any potential obstacles or challenges that could hinder the successful execution of the action plan. Strategies should be developed to mitigate these risks, considering their potential impact on the plan's objectives and ensuring alignment with CNSP priorities. It is also essential to anticipate and plan for contingencies to minimize disruptions and maintain progress toward achieving the desired outcomes.

Throughout the development and implementation of the action plan, it is crucial to involve key stakeholders to encourage buy-in, collaboration, and alignment with CNSP

goals. Soliciting feedback and input from relevant stakeholders ensures that their perspectives and concerns are taken into account in the planning process. By actively involving stakeholders in decision-making processes and seeking their participation in implementing the plan, a sense of ownership and commitment can be fostered among them.

(4) Step 4: Engage stakeholders.

To begin engaging stakeholders, it is important to communicate the significance of the ongoing noncompliance issues and underscore the critical importance of the proposed changes. Ensuring stakeholders grasp the vision and recognize the urgency for immediate action to tackle these challenges is key.

Establishing open channels of communication and collaboration with key stakeholders, such as HAs, A/OPCs, A/BOs, CHs, ATG auditors, and CNSP data analysts, is fundamental. Encouraging an environment where stakeholders feel comfortable expressing their thoughts, concerns, and suggestions fosters dialogue. Actively seeking input from stakeholders regarding their perspectives on the proposed changes is essential. Listening attentively to their feedback, addressing any concerns raised, and integrating valuable insights into the change process are vital steps.

Involving stakeholders in the change process helps cultivate buy-in and garner support for the proposed changes. Clearly articulating how their contributions are integral to the success of the initiative and how their involvement will positively impact the CNSP as a whole reinforces their sense of ownership and commitment.

(5) Step 5: Implement changes incrementally.

The change plan should be divided into smaller, manageable phases or milestones to facilitate a gradual implementation process. Each phase addresses specific aspects of the change initiative, allowing for focused attention and effective management.

Changes should be introduced over time, ensuring a methodical and controlled transition process. This approach helps mitigate potential disruptions to ongoing operations and minimizes resistance to change by allowing stakeholders to adapt gradually.

Stakeholders must be provided with sufficient time to adjust to the changes introduced in each phase. Adaptation to new processes, procedures, or systems may require time and patience. Individuals and teams will need time to acclimate to the new way of working before moving on to subsequent phases.

Stakeholders can be supported during the transition process by integrating comprehensive training and learning opportunities. For example, trainers could develop and deliver targeted training programs to educate personnel on GCPC policies, procedures, and disciplinary protocols and prioritize training for RPPOs and other personnel involved in GCPC operations, offering ongoing support, mentorship, and resources to reinforce compliance. Individuals must receive adequate instruction and resources to develop the skills and knowledge necessary to succeed in the changed environment with tailored training programs that address the specific needs identified in each phase.

Throughout each phase of implementation, it is essential to maintain continuous progress monitoring. Regularly evaluating the effectiveness of the changes implemented, identifying areas for improvement, and adjusting the implementation plan accordingly are necessary steps. Remaining flexible and responsive to feedback from stakeholders is key, allowing for adaptation of the approach to address emerging challenges or capitalize on opportunities.

(6) Step 6: Establish accountability and oversight mechanisms.

Establishing clear expectations, roles, and reporting mechanisms for compliance to ensure transparency and integrity. Compliance checks should be conducted to verify alignment with policies, including timely submission of GCPC binders and accuracy of records. Standardizing audit criteria across all regions to thoroughly examine documentation, transactions, and processes.

Emphasizing consequences for noncompliance and enforcing accountability through transparent processes helps foster regulatory compliance. Implementing accountability measures for all GCPC participants, with a particular focus on the HA, is essential.

ATG auditors should proactively communicate with CNSP GCPC staff about ships showing signs of probationary trends to address issues promptly.

(7) Step 7: Promote a culture of continuous improvement.

The CNSP GCPC program manager should encourage a culture of continuous learning, innovation, and adaptation among CNSP GCPC stakeholders.

Creating feedback loops and mechanisms to capture lessons learned from compliance efforts for informing future improvements. It is necessary to recognize and celebrate successes while also addressing areas where further enhancement is needed.

In summary, by following these seven change steps, CNSP can proactively address challenges, mitigate noncompliance risks, and foster a culture of adherence to GCPC policies and procedures, ensuring compliance.

D. LIMITATIONS OF THE STUDY

The study has provided a comprehensive analysis of the challenges associated with the GCPC program within CNSP and proposed recommendations to address these challenges. However, two limitations must be acknowledged:

- **Generalizability:** The study primarily focuses on the challenges faced within CNSP and may not fully capture the nuances present in other naval contexts or civilian procurement environments. Thus, the findings and recommendations may not be directly applicable to all settings.
- **Bias and Subjectivity:** The study incorporated subjective assessments of challenges and potential improvements, which may be influenced by the perspectives and experiences of myself or the participants involved. With the limited sample size, there is a risk of bias in the analysis.

E. FUTURE RESEARCH

Future research directions for addressing the challenges associated with the GCPC program within CNSP and preventing noncompliance aboard ships could explore several avenues:

- **Organizational Network Communication:** Conduct comprehensive studies on the organizational dynamics within shipboard environments to grasp the factors influencing GCPC management and compliance. Delve into the influence of leadership, organizational culture, and resource allocation on attitudes toward GCPC oversight and adherence to procedures. Identify key personnel who have the most significant impact on positively changing the ecosystem. Furthermore, explore strategies for boosting awareness and accountability among personnel responsible for GCPC operations.
- **Technological Solutions for Procurement Automation:** Investigate the feasibility and benefits of using advanced technologies including machine learning, artificial intelligence, and blockchain for streamlining GCPC procurement processes. Explore the potential for automated approval workflows, intelligent contract negotiation systems, and predictive analytics tools to enhance efficiency, accuracy, and compliance in procurement operations.
- **Evaluation of Intervention Strategies:** Evaluate the implementation and effectiveness of intervention strategies proposed in the existing literature, including those outlined in this study. Use rigorous research designs, such as quasi-experimental designs or randomized controlled trials, to assess the impact of specific interventions on compliance behavior, procurement outcomes, and organizational culture.

By exploring these research directions, scholars and practitioners can contribute to advancing understanding of the challenges and opportunities associated with GCPC programs in naval contexts and develop evidence-based strategies for enhancing compliance, efficiency, and effectiveness in procurement operations aboard ships.

F. CONCLUSION

The study underscores the multifaceted challenges faced by the GCPC program within CNSP aboard ships, spanning from technological limitations to human factors and

management issues. However, the proposed recommendations offer a comprehensive roadmap towards fostering compliance and efficiency within the procurement processes.

From enhancing internet connectivity to articulating strategic importance and bolstering stakeholder engagement, each recommendation addresses a critical aspect of the program's operation. By bridging the training gap, consolidating policies, standardizing grading processes, and improving audit and reporting mechanisms, the GCPC program can navigate its complexities more effectively.

These recommendations are not merely isolated solutions but interconnected strategies aimed at fostering a culture of adherence to policies and procedures. By implementing these measures, CNSP can proactively mitigate noncompliance risks and ensure long-term effectiveness and efficiency in its procurement operations aboard ships.

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APPENDIX A: PCAN FY23#05

Below is an example of a Purchase Card Administrative Notice (PCAN), released on 8 March 2023 (NAVSUP, 2023).

PCAN FY23 #05 –1st Half-FY23 Semi-annual Review (SAR) (Released 8 March 2023)

NOTE: THIS IS A COMPACFLT SPECIFIC SAHAR DEADLINES.
PURPOSE: To remind *COMPACFLT HL4 OA/OPCs and Direct Report HL5 A/OPCs* of the policy deadline for the Semi-annual Review process and provide best practice guidance for completing the Semi-annual Review for the period of 20 October 2022 through 19 March 2023.
OVERVIEW:

- **The *CPF Direct Report Commands HL5 A/OPCs* must complete the 1st Half-FY23 Semi-Annual Review required deliverables outlined in this PCAN no later than *12 MAY 2023***

- **The *HL4 OA/OPCs* must complete the 1st Half-FY23 Semi-Annual Review required deliverables outlined in this PCAN no later than *26 MAY 2023*.**

The SAR must be completed using the IOD Semi-Annual HA Review report (SAHAR) and the attached "SAR HA Checklist Template.docx."
To ensure compliance with mandated deadlines it is important to be proactive and ensure A/OPCs complete the A/OPC Monthly Review checklists on time so that the SAHAR can be completed. HL3 OA/OPCs must enforce the DPC Monthly A/OPC Review mandatory account suspension dates.
HL4 OA/OPCs and Direct Report HL5 A/OPCs REQUIRED DELIVERABLES UPLOADED AND SAVED IN THE IOD MESSAGE TAB NLT their respective deadlines:

1. Completed "SAR Checklist Template.docx" (see attached).
2. Signed "Semi-Annual HA Review Report (SAHAR)"

MONTHLY A/OPC REVIEW: HL3 and HL4 OA/OPCs must proactively monitor compliance and comply with mandatory DPC account suspension dates when Monthly A/OPC Reviews are not completed on time. To avoid account suspensions, complete the actions listed in the table below.

Review Cycle	Cycle Period	Mandatory Account Suspension Date
HL3 Monthly Review October Cycle	9/20/2022 – 10/19/2022	12/13/2022
HL3 Monthly Review November Cycle	10/20/2022 – 11/19/2022	1/13/2023
HL3 Monthly Review December Cycle	11/20/2022 – 12/19/2022	2/12/2023
HL3 Monthly Review January Cycle	12/20/2022 – 1/19/2023	3/15/2023
HL3 Monthly Review February Cycle	1/20/2023 – 2/19/2023	4/15/2023
HL3 Monthly Review March Cycle	2/20/2023 – 3/19/2023	5/13/2023

HL4 OA/OPCs *must* suspend the appropriate account(s) 40 days after the cycle end date if DM cases and A/OPC Monthly Reviews are not complete.
HL3 OA/OPCs **must** suspend the appropriate account(s) 55 days after the cycle end date if DM cases and A/OPC Monthly Reviews are not complete.

SEMI-ANNUAL REVIEW BEST PRACTICES & IOD SYSTEM UPDATE:

Line 6 (Number of Disputed Transactions // Dollar Value of Disputed Transactions) is advertised to automatically populate for the 1st Half of FY 23 Monthly Review and SAHAR reports.

Use the correct report parameters for the **HL3 SAHAR** in IOD:

1) Start Cycle Date for 1st Half of FY 2023 SAHAR must be 2022/09/20.
2) Select 00017 for the HL2 Hierarchy, followed by the selection of your HL3 Hierarchy. Leave HL4 through HL6 hierarchy selections blank.

HL5 Manual Entry into IOD Semi-annual Checklist Questionnaire: When completing the Semi-annual Checklist Questionnaire, HL5 A/OPC will have to manually enter the data for Line Numbers 21–26, and 31 of both the Monthly Review and SAHAR reports. A/OPCs must enter numeric values ONLY when a field is asking for a count or total. IOD will not sum values that are not numeric.

1) IOD Hierarchy Data Roll Up: For both the Semi-Annual Checklist Questionnaire, as well as the Monthly Checklist Questionnaire; IOD totals all data entered by all HL5s at the HL4 level, and subsequently totals all HL4 data at the HL3 level. This is applicable for Line Numbers 21–26, and 31.

   a) A continuously noted error on both Monthly Review and SAHAR reports happens when A/OPCs enter data redundantly at multiple hierarchy levels. For example, an activity has a total of 15 Disputes at the HL4 level for a given cycle; however, if three A/OPCs in different HL5 hierarchies all report "15"; then IOD totals all Disputes for a sum of 45 at the HL4 level. To avoid this scenario, each A/OPC must reflect the actual numbers in their hierarchy ONLY. Following the above

scenario with three HL5 A/OPCs; if they correctly report 5, 8, and 2 on their respective Monthly Checklist Questionnaire, then IOD will correctly sum a total of 15 disputes at the HL4 hierarchy.

2) Where HL5s can obtain values for the IOD Semi-annual Checklist Questionnaire:
   a) Line Number 6 – Disputes (# and $ Disputes) Run the Transaction Detail Report in Access Online, transaction date range of 10/20/2022 through 03/19/2023 (Disputed Status column – count transactions with a status of "Resolved in favor of CH," "Resolved in favor of Merchant," and "Unresolved"). This is a point in time value that can vary depending on when the Transaction Detail Report is run (CHs have up to 90 days after a transaction post to enter a dispute; when the report is run will affect totals).
   b) Line Numbers 21–26, these are manual count entries.
   c) Line Number 27- How many Cardholders are in your program? Use the Account List Report (AxOL>Reporting>Program Management>Administration>Account List) with **Account Status:** "Open" & "V9-Voluntary Closed," **Account Type:** "Cardholder Account," **Purged Accounts:** "Non-Purged Accounts Only," **Output Type:** "Excel," and **Group Report by** "Reporting Hierarchy Position" included in report parameters. Leave the date range blank. Ensure you remove duplicate Account Names from the report prior to counting CHs.
   d) Line Number 28 – Manual count entry.
   e) Line Number 31 – # of Convenience Check accounts not audited – HL5 should have copies of annual audit reports.
3) What is the dash on the Monthly Review and SAHAR report? You will notice that both the Monthly Review and SAHAR reports contain a dash in some data fields. You are not obligated to populate data into those fields.
4) SAR Checklist Template:

	Question Text	**Additional Information**	**A/OPC Response**
1	How many transactions were disputed during the reporting period? (Should equal the value populated on the SAHA report, row 6)	Provide a straight count of the number of transactions that were disputed during the reporting period. The number of disputed transactions can be determined by running the Transaction Detail report in Access Online for transactions in Disputed Status. (The number of disputes is a "point in time" data element and can change as new disputes are added and existing disputes are resolved or withdrawn)	

2	What was the dollar value of the disputed transactions? (Should equal the value populated on the SAHA report, row 6)	Provide the sum of the $ value of all transactions disputed during the reporting period. The number of disputed transactions can be determined by running the Transaction Detail report in Access Online for transactions in Disputed Status and then totaling the Transaction Amount column. (The number of disputes is a "point in time" data element and can change as new disputes are added and existing disputes are resolved or withdrawn)	
3	How many Head of Activities (HAs) are in your program? (Number of individuals, not accounts) (Should equal the value populated on the SAHA report, row 21)	Provide a straight count of the number of individuals who serve as a HA on your program. The HA is the senior-most person in an organization that employs an A/OPC. The HA can delegate his or her GPC oversight functions no lower than the Commanding Officer's deputy, the Chief of Contracts or Head of Procurement, or the Chief of Contracts' deputy or Head of Procurement's deputy. Each Component must determine which of its roles will serve as the HA and document that determination in Component/ local procedures. If a Defense Agency or Activity has been designated HCA authority as defined in FAR Part 2, their HA is the HCA or the HCA's deputy, who must be an individual in a management position not to exceed one level below the HCA. Under no circumstances can a CPM serve as the HA.	
4	How many HAs in your program do NOT have documented evidence of training per current instruction? (May not exceed the number of HAs reported above) (Should equal the value populated on	Provide a straight count of the number of individuals required to sign the Semi-Annual HA Report who have **NOT** completed training per current instruction. A listing of DOD mandated training requirements by role is available at: https://www.acq.osd.mil/dpap/pdi/pc/training.html. Check Component and Local policy for additional requirements.	

	the SAHA report, row 22)		
5	Reason why not all HAs are trained:	Failure to complete mandatory training requirements is a serious program violation. Acceptable reasons are limited to deployment to an area with limited Internet connectivity, serious illness, or, other similar circumstances.	
6	How many Agency/ Organization Program Coordinators (A/ OPCs) are in your program? (Number of individuals, not accounts) (Should equal the value populated on the SAHA report, row 23)	Provide a straight count of the number of individuals who serve as a Primary or Alternate A/ OPC on your program. Individuals who serves as both a Primary and Alternate AO are only counted once.	
7	How many A/OPCs in your program do NOT have documented evidence of training per current instruction? (May not exceed the number of A/OPCs reported above) (Should equal the value populated on the SAHA report, row 24)	Provide a straight count of the number of individuals who are Primary or Alternate A/OPCs on your program who have **NOT** completed training per current instruction. A listing of DOD-mandated training requirements by role is available at: https://www.acq.osd.mil/dpap/pdi/pc/ training.html. Check Component and Local policy for additional requirements.	
8	Reason why not all A/OPCs are trained:	Failure to complete mandatory training requirements is a serious program violation. Acceptable reasons should be limited to	

		deployment to an area with limited internet connectivity, serious illness or other similar circumstance.	
9	How many Approving/ Billing Officials (A/BOs) are in your program? (Number of individuals, not accounts) (Should equal the value populated on the SAHA report, row 25)	Provide a straight count of the number of individuals (not accounts) who serve as a Primary or Alternate A/BO on your program. Any individual who serves as a Primary or Alternate A/BO on more than one account is counted only once.	
10	How many A/BOs in your program do NOT have documented evidence of training per current instruction? (May not exceed the number of Approving/Billing Officials reported above) (Should equal the value populated on the SAHA report, row 26)	Provide a straight count of the number of individuals who serve as a Primary or Alternate A/BO on your program who have **NOT** completed training per current instruction. A listing of DOD mandated training requirements by role is available at: https://www.acq.osd.mil/dpap/pdi/pc/training.html. Check Component and Local policy for additional requirements.	
11	Reason why not all Approving/Billing Officials are trained:	Failure to complete mandatory training requirements is a serious program violation. Acceptable reasons are limited to deployment to an area with limited internet connectivity, serious illness or other similar circumstance.	
12	How many Convenience Check Accounts exist in your program?	Provide a straight count of the number of Convenience Check Accounts in your program's span of control. The number of accounts can be determined by running the Cardholder Account	

	(Should equal the value populated on the SAHA report, row 30)	List report including Account Detail in Access Online.	
13	How many Convenience Check Accounts were NOT audited within the last 12 months? (Should equal the value populated on the SAHA report, row 31)	Provide a straight count of the number of Convenience Check Accounts that have **NOT** been audited within the last 12 months as required by DOD FMR Volume 10, Chapter 23. (Paragraph titled Reconciliation of Convenience Check Accounts).	

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APPENDIX B: PCPN #02D

Below is an example of a Purchase Card Policy Notice (PCPN) released on 4 March 2024 (NAVSUP, 2024b).

PCPN #02D – (Released 4 March 2024)

NOTE: HIERARCHY LEVEL (HL) 3 OVERSIGHT AGENCY/ORGANIZATION PROGRAM COORDINATORS (OA/OPCs) – IT IS YOUR RESPONSIBILITY TO GIVE

THIS NOTICE WIDEST DISSEMINATION TO DEPARTMENT OF THE NAVY (DON)

GOVERNMENT-WIDE COMMERCIAL PURCHASE CARD (GPC) PROGRAM PARTICIPANTS TO INCLUDE A/OPCs, APPROVING OFFICIALS (A/BOs)/MANAGING ACCOUNTS (MA), CARDHOLDERS (CHs) AND RESOURCE/FINANCIAL MANAGERS (R/FMs) IN YOUR HIERARCHY.

NAVSUPINST 4200.99D	Department of the Navy Government Purchase Card Program Policy	4 Mar 24

SUMMARY OF MAJOR CHANGES

PCPN changes are identified in this table and denoted in **blue font** within the instruction.

A complete instruction includes NAVSUPINST 4200.99D, all change transmittals, and interim Purchase Card Policy Notices (PCPN). PCPNs provide for immediate policy updates pending a change transmittal to the instruction.

The previous version dated **15 Feb 2024** is superseded.

Chap & Para	EXPLANATION OF CHANGE/REVISION	PCPN
Chap 4, Para 6. o.	Removed "Flags and Pennants" from Prohibited Purchases and renumbered remainder of paragraph.	02D 4 Mar 24
Throughout instruction	Numerous policy updates issued since the publication of the instruction. Changes made throughout the document; primarily with Prohibited Purchases.	01D 15 Feb 24

PLEASE REFER TO THE INSTRUCTIONS PUBLISHED ON THE CCPMD WEBSITE FOR CHANGES INCORPORATED IN BLUE FONT. PCPN NUMBER

AND DATE IN HEADER OF INSTRUCTION CORROLATES TO LATEST PCPN ISSUANCE.

HOW PCPNs WORK:

PCPNs will only address policy updates to the NAVSUPINST 4200.99 series. (PCANs will address administrative updates such as deadlines and program notices e.g., SAHAR deadlines & FY LOA Rollover instructions).
On the "Policies" tab of the CCPMD GPC Website, you will now see two versions of the NAVSUPINST 4200.99 series:

1. NAVSUPINST 4200.99D with PCPNs Incorporated in the Document, and

2. NAVSUPINST 4200.99D Signed Instruction (without PCPN changes).

The NAVSUPINST 4200.99D with PCPNs Incorporated in the Document will show changes to the document in blue font. These changes will revert to black ink once a new PCPN is issued, for which the new changes will be shown in blue ink. This is similar to the update format used by the FMR.
The header of the NAVSUPINST 4200.99D with PCPNs Incorporated in the Document will also have a date and PCPN number to show the document version. This document will also be preceded by a copy of the latest PCPN.
It is advised that GPC personnel utilize the CCPMD website to access the NAVSUPINST 4200.99 series instead of printing a copy. The dynamic and ever-increasing changes to procurement and financial management policy updates require on-line access to updated policy.
CCPMD intends to release a revised NAVSUPINST 4200.99E within 24 months of signed issuance, at which time all issued PCPNs will have been incorporated, and a PCPN numbering convention will start at "PCPN #01E." We anticipate a complete revision to the instruction in lieu of change transmittals.

Purchase Card Helpdesk
DON Consolidated Card Program Management Division
Email: DON_Purchasecard@us.navy.mil
Website: https://my.navsup.navy.mil/webcenter/portal/ccpmd_pc/pages_overview

APPENDIX C: INSTRUCTION EMAIL FROM CNSP

Below was guidance sent to the ships from CNSP data analysts in the form of email:

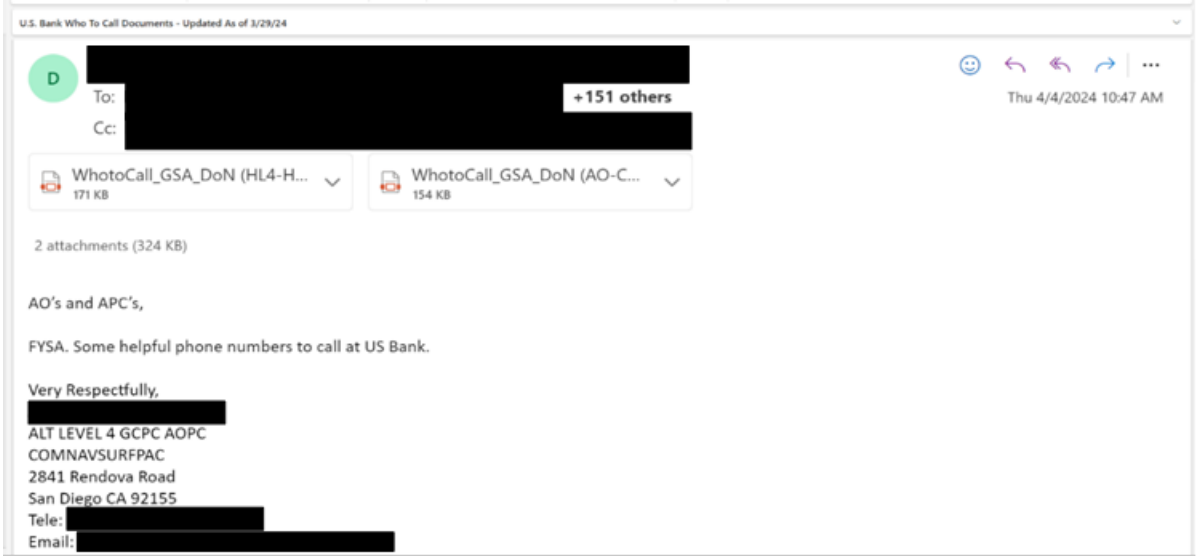

Figure 15. Instruction Email from CNSP

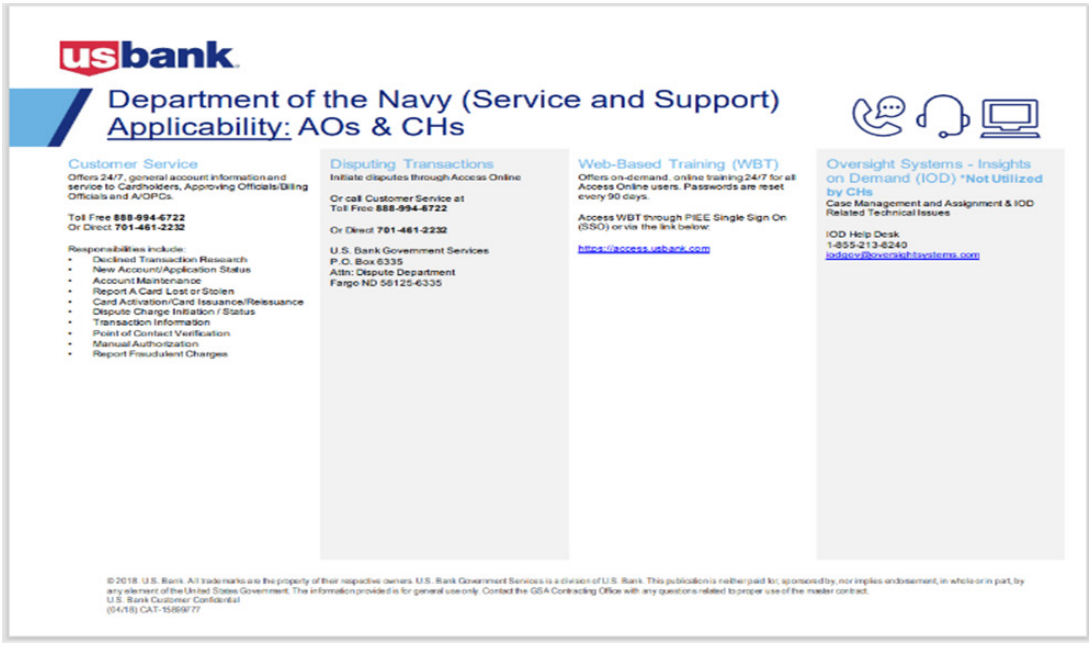

Figure 16. U.S. Bank Help Desk Contact

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APPENDIX D: QUESTIONNAIRE RESPONSES

This appendix provides questionnaire responses, whether in-person interviews or email replies, from all participants in the study.

(1) Respondent #1 (HL5)

How much is spent using GCPC in a year? *$200,000*

What approximate percentage of the ship's total annual spending is attributed to GCPC expenditures? *2.5%*

How many GCPC transactions occur per month? *15*

What are the common items or services bought with GCPC? *Non-APL items, SAR gear without NSN, HAZMAT, self-service laundry, ceremonial equipment, quarterdeck decorations, table covers, Culinary Specialist uniform, back ordered merchandise, non-NSN items.*

How are trainings conducted for GCPC users? *Monthly RPPO reviews, PCAN reviews, and online training (DAU, CCPMD).*

How often do personnel involved with GCPC rotate? *1 year for CHs, 6–12 months for RPPOs, CHs train RPPOs.*

How do you stay updated with current or revised GCPC policies? *No tracking updates.*

What are some common reasons for the lateness of quarterly GCPC binder submissions? *Typically, not late.*

Are you aware of the consequences of non-compliance with CNSP GCPC policy? *Suspension of programs, remedial training, legal involvement, and Uniform Code of Military Justice (UCMJ) action for blatant violations.*

Does the Commanding Officer apply pressure regarding GCPC purchases? *Not often, only one time.*

How easy is it to use GCPC, and how important is it to your operations? *Least favorite program for SUPPO due to a lot of room for errors.*

How many transactions per month make you feel uncomfortable? *0.*

Who do you reach out to if you encounter issues with GCPC? *A/BO, ATG auditors, CNSP data analysts.*

What is the typical response time when seeking help for GCPC issues? *Promptly.*

How many hours do you spend on GCPC-related tasks each week? *3 hours.*

Has your ship ever been suspended? If so, why? *Yes, late submittal for the HA review.*

What are some reasons for delays in processing Open Purchase Requests? *Frequent kickbacks, expired quotes, inadequate justification, and RPPO duty are often assigned to less experienced personnel (E4-E5).*

(2) Respondent #2 (HL5)

How much is spent using GCPC in a year? *$209,000.*

What approximate percentage of the ship's total annual spending is attributed to GCPC expenditures? *2.0%.*

How many GCPC transactions occur per month? *7.*

What are the common items or services bought with GCPC? *Aviation firefighting gear, parking signs, CO2 bottle refill, CS uniforms, command ballcaps, rockers, Uniform name tapes, refrigerators, anti-terrorism training material, pipe patching kits, scissor lift service, safety glasses, welding material, SAR gears, target gun shoot.*

How are trainings conducted for GCPC users? *IOP, RPPO Personal Qualification Standard (PQS) 302, written test, and oral board with A/BO & A/OPC.*

How often do personnel involved with GCPC rotate? *CHs and AOs remain the same until they transfer.*

How do you stay updated with current or revised GCPC policies? *CNSP data analysts and ATG auditors.*

What are some common reasons for the lateness of quarterly GCPC binder submissions? *Deployment, early ATG closure, sailors on leave, negligence.*

Are you aware of the consequences of non-compliance with CNSP GCPC policy? *No.*

Does the Commanding Officer apply pressure regarding GCPC purchases? *No.*

How easy is it to use GCPC, and how important is it to your operations? *An integral part of the Supply department.*

How many transactions per month make you feel uncomfortable? *0.*

Who do you reach out to if you encounter issues with GCPC? *CNSP data analysts and ATG auditors.*

What is the typical response time when seeking help for GCPC issues? *Promptly.*

How many hours do you spend on GCPC-related tasks each week? *1 hour per day.*

Has your ship ever been suspended? If so, why? *Late submission; probation for 1 year.*

What are some reasons for delays in processing Open Purchase Requests? *Some new companies are unfamiliar with military procedures, causing delays in quotes; overseas vendors applying sales tax on invoices; language barriers with vendors, CH transfers and leave resulting in lost or missing documentation; and invoices not received in time for grading.*

What else should we consider when trying to improve the GCPC process? *Reduce the number of websites required for GCPC reporting (IOD, USBank, PIEE, ATG grading); address issues with websites not loading while the ship is underway, leading to the perception of laziness; standardize forms in the stock system NSN, avoiding DPAS; equip NAVFAC with commonly demanded items like scissor lifts for ship use, analyze data on common purchase items to optimize spending and reduce reliance on GCPC; consider the ship's workload when scheduling training at ATG; manage purchases more effectively, especially in the third month of the quarter.*

(3) Respondent #3 (HL5)

How much is spent using GCPC in a year? *$100,000.*

What approximate percentage of the ship's total annual spending is attributed to GCPC expenditures? *2.0%.*

How many GCPC transactions occur per month? *20.*

What are the common items or services bought with GCPC? *Non-NSN items, time-sensitive items.*

How are trainings conducted for GCPC users? *In classroom sessions, monthly RPPO training, on-the-job training, DAU & PIEE training.*

How often do personnel involved with GCPC rotate? *CHs do not rotate*.

How do you stay updated with current or revised GCPC policies? *NAVSUP CCPMD updates; SUPPO needs to subscribe.*

What are some common reasons for the lateness of quarterly GCPC binder submissions? *Not late.*

Are you aware of the consequences of non-compliance with CNSP GCPC policy? *Some requirements are seen as silly and unnecessary; there are contradictions between NAVSUP and CNSP policies.*

Does the Commanding Officer apply pressure regarding GCPC purchases? *Little to no pressure*.

How easy is it to use GCPC, and how important is it to your operations? *Love using it for last-minute items*.

How many transactions per month make you feel uncomfortable? *0.*

Who do you reach out to if you encounter issues with GCPC? *CNSP data analysts and ATG auditors.*

What is the typical response time when seeking help for GCPC issues? *Promptly.*

How many hours do you spend on GCPC-related tasks each week? *5–10 hours.*

Do you report findings to CMP? *No.*

Has your ship ever been suspended? If so, why? *No.*

What are some reasons for delays in processing Open Purchase Requests? *No answers.*

What else should we consider when trying to improve the GCPC process? *Eliminate unnecessary requirements and policies that do not align with 21st-century ship schedules and operations. Modernize policies that were written for 1990s operations and guidelines. Ensure shelves are stocked and contracts are in place to support sailors' needs, reducing reliance on the GCPC program*.

(4) Respondent #4 (HL5)

How much is spent using GCPC in a year? *$289,000.*

What approximate percentage of the ship's total annual spending is attributed to GCPC expenditures? *3.0%.*

How many GCPC transactions occur per month? *12.*

What are the common items or services bought with GCPC? *EMRM.*

How are trainings conducted for GCPC users? *PIEE Account, on-the-job training (OJT), DAU.*

How often do personnel involved with GCPC rotate? *Yearly.*

How do you stay updated with current or revised GCPC policies? *Not tracking.*

What are some common reasons for the lateness of quarterly GCPC binder submissions? *No connectivity, busy ship's schedule, flight operations, general quarters (GQ), misalignment of ship's priorities with supply priorities.*

Are you aware of the consequences of non-compliance with CNSP GCPC policy? *Yes.*

Does the Commanding Officer apply pressure regarding GCPC purchases? *No.*

How easy is it to use GCPC, and how important is it to your operations? *Importance is high, but there are too many requirements.*

How many transactions per month make you feel uncomfortable? *0.*

Who do you reach out to if you encounter issues with GCPC? *CNSP data analysts.*

What is the typical response time when seeking help for GCPC issues? *24–48 hours.*

How many hours do you spend on GCPC-related tasks each week? *1 hour per day.*

Do you report findings to CMP? *Not applicable.*

Has your ship ever been suspended? If so, why? *No.*

What are some reasons for delays in processing Open Purchase Requests? *No answer.*

What else should we consider when trying to improve the GCPC process? *Reduce the requirements on PIEE.*

(5) Respondent #5 (HL5)

How much is spent using GCPC in a year? *$463,000.*

What approximate percentage of the ship's total annual spending is attributed to GCPC expenditures? *5.0%.*

How many GCPC transactions occur per month? *12.*

What are the common items or services bought with GCPC? *Non-NSN items, consumables, CO2 refills, services, and parts not in stock in the Navy supply system.*

How are trainings conducted for GCPC users? *Initial training, annual training, refresher training, A/BO oversees GCPC binder.*

How often do personnel involved with GCPC rotate? *Every 6–12 months.*

How do you stay updated with current or revised GCPC policies? *ATG, Level 3 APC, and emails from CNSP data analysts (PCANs are confusing).*

What are some common reasons for the lateness of quarterly GCPC binder submissions? *Not applicable*

Are you aware of the consequences of non-compliance with CNSP GCPC policy? *Suspension, inability to use the card in emergencies, long process for reinstatement.*

Does the Commanding Officer apply pressure regarding GCPC purchases? *CO sees GCPC as a tool to accomplish the mission.*

How easy is it to use GCPC, and how important is it to your operations? *High importance, but increasing paperwork and PCANs make it cumbersome.*

How many transactions per month make you feel uncomfortable? *0.*

Who do you reach out to if you encounter issues with GCPC? *CNSP data analysts, ATG auditors.*

What is the typical response time when seeking help for GCPC issues? *48 hours, due to the time difference.*

How many hours do you spend on GCPC-related tasks each week? *1 hour per day.*

Do you report findings to CMP? *Not applicable.*

Has your ship ever been suspended? If so, why? *Yes, twice. Late submissions.*

What are some reasons for delays in processing Open Purchase Requests? *Ship connectivity, busy underway schedule, shifting priorities.*

What else should we consider when trying to improve the GCPC process? *Reduce bureaucracy, streamline and simplify the process, understand user perspective, and avoid sending lengthy emails regularly and expecting ships to read them.*

(6) Respondent #6 (HL5)

How much is spent using GCPC in a year? *$250,000.*

What approximate percentage of the ship's total annual spending is attributed to GCPC expenditures? *3.0%.*

How many GCPC transactions occur per month? *20.*

What are the common items or services bought with GCPC? *Non-APL items, SAR gear without NSN, Hazmat, self-service Laundry, ceremonial, equipment, quarterdeck decorations, table covers, CS uniforms, back ordered merch. Non-NSN, command Ballcaps, CMD rockers, CMD name tapes.*

How are trainings conducted for GCPC users? *Initial training, annual training, refresher training.*

How often do personnel involved with GCPC rotate? *2–3 years.*

How do you stay updated with current or revised GCPC policies? *CNSP and NAVSUP websites.*

What are some common reasons for the lateness of quarterly GCPC binder submissions? *Underway, required training not complete.*

Are you aware of the consequences of non-compliance with CNSP GCPC policy? *Failures below 80% place the ship on remediation and closer scrutiny.*

Does the Commanding Officer apply pressure regarding GCPC purchases? *No.*

How easy is it to use GCPC, and how important is it to your operations? *Ease of use: 5/10, Importance: 5/10.*

How many transactions per month make you feel uncomfortable? *5 transactions.*

Who do you reach out to if you encounter issues with GCPC? *Leadership, CNSP data analysts if needed.*

What is the typical response time when seeking help for GCPC issues? *2–3 days.*

How many hours do you spend on GCPC-related tasks each week? *5 hours.*

Has your ship ever been suspended? If so, why? *No.*

What are some reasons for delays in processing Open Purchase Requests? *Funding issues, completeness of the OPR, and impact statements on why GCPC was the chosen route.*

What else should we consider when trying to improve the GCPC process? *Make it faster with fewer requirements*

(7) Respondent #7 (HL5)

How much is spent using GCPC in a year? *$270,000.*

What approximate percentage of the ship's total annual spending is attributed to GCPC expenditures? *3%.*

How many GCPC transactions occur per month? *8.*

What are the common items or services bought with GCPC? *Non-APL items, SAR gear without NSN, Hazmat, self-service Laundry, ceremonial, equipment, quarterdeck decorations, table covers, CS uniforms, back ordered merch. Non-NSN, command Ballcaps, CMD rockers, CMD name tapes.*

How are trainings conducted for GCPC users? *Initial training, annual training, refresher training.*

How often do personnel involved with GCPC rotate? *Keep the same CHs and AOs until they transfer.*

How do you stay updated with current or revised GCPC policies? *CNSP, not independently.*

What are some common reasons for the lateness of quarterly GCPC binder submissions? *Underway, deployment schedule, poor internet bandwidth, need to wait until in port to run certain reports on U.S. Bank.*

Are you aware of the consequences of non-compliance with CNSP GCPC policy? *Program suspension.*

Does the Commanding Officer apply pressure regarding GCPC purchases? *No; sometimes the situation requires a local purchase instead of waiting for material from CONUS due to urgency or underway schedule.*

How easy is it to use GCPC, and how important is it to your operations? *Ease of use: 5/10, Importance: 8/10.*

How many transactions per month make you feel uncomfortable? *1; category of purchase; insufficient justification; missing documentation.*

Who do you reach out to if you encounter issues with GCPC? *CNSP data analysts, ATG auditors.*

What is the typical response time when seeking help for GCPC issues? *1–2 business days*.

How many hours do you spend on GCPC-related tasks each week? *2 hours; unless end of the quarter.*

Has your ship ever been suspended? If so, why? *Yes. Accidentally deleted our program on U.S. Bank due to poor web design.*

What are some reasons for delays in processing Open Purchase Requests? *Insufficient justification, missing paperwork on OPR (e.g., 899 form), insufficient quote (e.g., missing shipping charges).*

What else should we consider when trying to improve the GCPC process? U.S. *Bank APC support phoneline operates during CONUS business hours. As an overseas unit, our business hours do not align with CONUS business hours. Our cards often get declined in urgent situations, requiring me to call the APC hotline while it is closed. Recommend increasing APC hotline business hours to 24/7.*

(8) Respondent #8 (HL5)

How much is spent using GCPC in a year? *$200,000.*

What approximate percentage of the ship's total annual spending is attributed to GCPC expenditures? *2.5%.*

How many GCPC transactions occur per month? *25.*

What are the common items or services bought with GCPC? *Non-APL items, SAR gear without NSN, Hazmat, self-service Laundry, ceremonial, equipment, quarterdeck decorations, table covers, CS uniforms, back ordered merch. Non-NSN, command Ballcaps, CMD rockers, CMD name tapes.*

How are trainings conducted for GCPC users? *Initial training, annual training, refresher training.*

How often do personnel involved with GCPC rotate? *1–2 years based on projected rotation date (PRD).*

How do you stay updated with current or revised GCPC policies? *Level 4 APC distributes updates.*

What are some common reasons for the lateness of quarterly GCPC binder submissions? *Not late.*

Are you aware of the consequences of non-compliance with CNSP GCPC policy? *Removal of the ability to make local purchases.*

Does the Commanding Officer apply pressure regarding GCPC purchases? *No.*

How easy is it to use GCPC, and how important is it to your operations? *Ease of use: 8/10, Importance: 10/10.*

How many transactions per month make you feel uncomfortable? *2; due to available balance or OFC-20 issues.*

Who do you reach out to if you encounter issues with GCPC? *Leadership, TYCOM.*

What is the typical response time when seeking help for GCPC issues? *1–2 business days.*

How many hours do you spend on GCPC-related tasks each week? *5–6 hours per week.*

Do you report findings to CMP? *Yes.*

Has your ship ever been suspended? If so, why? *No.*

What are some reasons for delays in processing Open Purchase Requests? *N/A.*

What else should we consider when trying to improve the GCPC process? *Consolidate instructions across TYCOMs.*

(9) Respondent #9 (HL5)

How much is spent using GCPC in a year? *$180,000.*

What approximate percentage of the ship's total annual spending is attributed to GCPC expenditures? *2.2%.*

How many GCPC transactions occur per month? *10.*

What are the common items or services bought with GCPC? *Non-APL items, SAR gear without NSN, Hazmat, self-service laundry, ceremonial items, equipment, quarterdeck decorations, table covers, CS uniforms, back ordered merchandise, non-NSN items, command ball caps, CMD rocker, CMD name tape.*

How are trainings conducted for GCPC users? *Initial training, annual training, refresher training.*

How often do personnel involved with GCPC rotate? *Keep the same CHs and AOs until they transfer.*

How do you stay updated with current or revised GCPC policies? *CNSP.*

What are some common reasons for the lateness of quarterly GCPC binder submissions? *Ship's connectivity.*

Are you aware of the consequences of non-compliance with CNSP GCPC policy? *Program suspension.*

Does the Commanding Officer apply pressure regarding GCPC purchases? *No pressure unless it relates to the mission.*

How easy is it to use GCPC, and how important is it to your operations? *Ease of use: 9/10; Importance: 8/10.*

How many transactions per month make you feel uncomfortable? *0.*

Who do you reach out to if you encounter issues with GCPC? *CNSP data analysts, ATG auditors.*

What is the typical response time when seeking help for GCPC issues? *1–2 business days.*

How many hours do you spend on GCPC-related tasks each week? *5 hours.*

Has your ship ever been suspended? If so, why? *Yes. Late submission; probation for 1 year.*

What are some reasons for delays in processing Open Purchase Requests? *N/A.*

What else should we consider when trying to improve the GCPC process? *Maybe make a detailed list of authorized purchases for each command type or a simpler way to find which items are unauthorized.*

(10) Respondent #10 (HL5)

How much is spent using GCPC in a year? *$200,000.*

What approximate percentage of the ship's total annual spending is attributed to GCPC expenditures? *3.0%.*

How many GCPC transactions occur per month? *20.*

What are the common items or services bought with GCPC? *Non-APL items, SAR gear without NSN, Hazmat, self-service laundry, ceremonial items, equipment, quarterdeck decorations, table covers, CS uniforms, back ordered merchandise, non-NSN items, command ball caps, CMD rocker, CMD name tape.*

How are trainings conducted for GCPC users? *Initial training, annual training, refresher training.*

How often do personnel involved with GCPC rotate? *Keep the same CHs and AOs until they transfer.*

How do you stay updated with current or revised GCPC policies? *CNSP.*

What are some common reasons for the lateness of quarterly GCPC binder submissions? *Not late.*

Are you aware of the consequences of non-compliance with CNSP GCPC policy? *Program suspension.*

Does the Commanding Officer apply pressure regarding GCPC purchases? *No.*

How easy is it to use GCPC, and how important is it to your operations? *Ease of use: 8/10; Importance: 10/10.*

How many transactions per month make you feel uncomfortable? *2.*

Who do you reach out to if you encounter issues with GCPC? *ATG, CNSG, and CNSP data analysts.*

What is the typical response time when seeking help for GCPC issues? *1–2 business days.*

How many hours do you spend on GCPC-related tasks each week? *5 hours.*

Has your ship ever been suspended? If so, why? *No.*

What are some reasons for delays in processing Open Purchase Requests? *No answers.*

What else should we consider when trying to improve the GCPC process? *No answers.*

(11) Respondent #11 (HL4.5)

What are the common issues with the GCPC program? *Common issues include compliance with FIARS, missing legible names or prints, hazmat purchases missing documentation, and incorrect LOAs.*

How many ships are in your territory? *There are 10 ships in our territory, consisting of 8 DDGs and 2 CGs.*

How do the auditors get trained? *Auditors receive training through hands-on experience, PQS at ATG, on-the-job training, guidance from Gus, PCANs, DAU courses, and CCPMD courses.*

What grading list do the auditors use? Is it the same as those the ships use? Is it the same across PACFLT? *Auditors use the ATGPAC GCPC monthly audit checklist. This checklist is consistent across all ships and throughout PACFLT.*

Do you provide GCPC training? How often? *GCPC training is provided upon request from ships.*

Do all sites apply the same GCPC checklist? *Yes, all sites utilize the same GCPC checklist.*

What else should we consider when trying to improve the process? *It is important to reinforce consistent grading criteria across all ATGs.*

How punctual are ships in submitting their GPC binder? *Ships must provide a valid reason for lateness. Ships on patrol or deployment have one month after the deadline to submit records.*

How often do ships turn in records? *Ships submit records quarterly: Q1: Oct-Dec, deadline 14JAN; Q2: Jan-Mar, deadline 14APR; Q3: Apr-Jun, deadline 14JUL; Q4: Jul-Sep, deadline 14Oct. Ships have one month to turn in records and seven business days to resubmit for a reaudit. The maximum score for a reaudit is 80%.*

(12) Respondent #12 (HL4.5)

What are the common issues with the GCPC program? *Common issues include failure to screen mandatory sources (NAVFAC, DAPS, SWIRMC); certification with the wrong LOA or using the wrong fund; non-compliance with FIAR invoice requirements; using GCPC for continuing services; incorrect completion of NAVSUP306 Sub-custody form; noncompliance-with NDAA requirements.*

How many ships are in your territory? *Approximately 50 ships, including CG, DDG, LHA, LHD, LSD, DDG-1000, and ESB.*

How do auditors receive training? *Auditors receive training through pass downs and check sheets.*

What grading list do auditors use? Is it consistent across PACFLT? *The 2023 CNSP Check Sheet is available on SharePoint and is used consistently across all sites.*

Do you provide GCPC training? How often? *GCPC training is provided only for underperforming ships (score less than 80%) on a biannual or annual basis.*

Do all sites apply the same GCPC checklist? *Yes, all sites utilize the same GCPC checklist.*

What else should we consider when trying to improve the process? *Additional considerations for improvement include increased support and encouragement from the CO to expedite tasks; prioritizing emergency services exceeding $2500; implementing more suspension and probation measures; simplifying the process; including administrative grading in the check sheet; assigning Disbursing Officer (DISBO) as A/OPC; allowing shore support to procure items for ships rather than using GCPC; establishing awards for outstanding GCPC program management on ships.*

How punctual are ships in submitting their GPC binder? *Ships are expected to submit their GPC binders 50% on time, 25% late with a valid reason, and the remaining 25% late without a valid reason.*

How often do ships turn in records? *No specific answer was provided.*

(13) Respondent #13 (HL4.5)

What are the common issues with the GCPC program? *Common issues include Non-compliance with FIAR requirements (quantity not circled, dated, and signed); Missing itemized invoices; Expired training certifications; Inaccurate maintenance of the purchase card log (e.g., the discrepancy between the date received on the log and invoice received date).*

How many ships are in your territory? *No specific answer was provided.*

How do auditors receive training? *Auditors receive hands-on training from other auditors and must have experience on small ships for their billet. They also receive augmented training in other areas of responsibility.*

What grading list do auditors use? Is it consistent across PACFLT? *Auditors use the ATGPAC grading list, which is consistent across SURFPAC.*

Do you provide GCPC training? How often? *No specific answer was provided.*

Do all sites apply the same GCPC checklist? *Yes, all sites utilize the same GCPC checklist.*

What else should we consider when trying to improve the process? *Improvements could focus on ensuring familiarity with the checklist among CH, AO, and APC personnel.*

How punctual are ships in submitting their GPC binder? *No specific answer was provided.*

How often do ships turn in records? *No specific answer was provided.*

(14) Respondent #14 (HL4.5)

What are the common issues with the GCPC program? *Common issues include: improper screening of mandatory sources; purchasing NSN items without valid justification; lack of itemized invoices; non-compliance with FIAR requirements; inadequate justification; failure to meet administrative requirements;*

How many ships are in your territory? *No specific answer was provided*.

How do auditors receive training? *Auditors receive training from other auditors and clarification on policy changes/updates from other ATGs.*

What grading list do auditors use? Is it consistent across PACFLT? *Auditors use the self-assessment checklist 5040.1D, which may differ from the checklist used by ships.*

Do you provide GCPC training? How often? *No specific answer was provided.*

Do all sites apply the same GCPC checklist? *Yes, all sites utilize the same GCPC checklist.*

What else should we consider when trying to improve the process? *Considerations for improvement include implementing a standardized training program and ensuring consistency in auditing practices.*

How punctual are ships in submitting their GPC binder? *No specific answer was provided.*

How often do ships turn in records? *No specific answer was provided.*

(15) Respondent #15 (HL4)

How many ships were suspended in 2022 and 2023? *Three ships were suspended in FY 23. 20 Below 80%.*

How often do policies get updated? *Fifteen PCANs were issued in FY22, and thirteen PCANs were issued in FY23. New guidance from CNSP and ATG is also provided.*

How did the update get communicated to the ships? *Updates are communicated via email and phone calls.*

How many people govern this program? *The program is governed by five people at Level 4: 1 Level 4 HA, 1 Assistant HA, and 3 data analysts.*

How many ships are involved? *The program encompasses DDG, CG, L-Decks, Mine Sweepers, and LCS, totaling 104 ships.*

What is the structure of the GCPC program? *Level 5: Unit command, APC Level 5, AO, CH; Level 4: CNSP; Level 3: PACFLT; Level 2: CCPMD; Level 1: NAVSUP.*

Did they ensure the ship got the message? *No, there is currently no means to ensure that ships receive messages.*

How did the participants get trained? *Participants are required to read all applicable instructions and PCANs.*

How to exit probation? *To exit probation, there must be no further violations in the following four quarters.*

How to exit suspension? *All training must be completed again. SUPPO, AO, and CHs must visit the office of Level 4 HA with all program binders, proof of completed training, and timely report submissions to reinstate the program.*

Is there a central instruction for the whole program? *No, there is no central instruction. However, there are various documents including SURFORCE 4400, 5040, NAVSUP 4200.99 series, DON SAP Guides 2018, and PCANs.*

Does CNSP report findings anywhere? *CNSP reports findings on a tracker on SharePoint, with an updated master tracker from ATG.*

What are the different software/platforms within the GCPC program? *Software/platforms include USBank for card management and AO certifications, Insight on Demand (IOD) for auditing, and PIEE for governing all training.*

What else should we consider when trying to improve the process? *Revamping documents such as 5040 and 4400 to emphasize GCPC instructions; reinforcing penalties and punishments.*

What do you think can go wrong with the program? *When personnel become accustomed to the program, everything runs smoothly. However, when new individuals join, there is a learning curve.*

What are the criteria for a ship to be on probation? *Ships can be placed on probation for certifying U.S. Bank later than the 30th of the month; certifying IOD for the previous cycle later than the 20th of the month; turning in the ATG binder late without justification; receiving an ATG grading score of less than 80%.*

(16) Respondent #16 (HL3)

What role does Level 3 play in the GCPC Program? *Level 3 receives policy from Level 2 (NAVSUP), interprets it to fit specific situations, and passes it down to Level 4. They oversee Level 4 entities, control the MCC, and monitor transactions to ensure CHs are authorized to purchase.*

How many individuals oversee Level 3? *A few individuals oversee Level 3, including Mr. Howard for PACFLT and others for CNIC, SPAWAR, etc.*

What is the number of Level 4 entities you are responsible for managing, and could you provide their names? *We manage approximately 1500 CHs, 300 AOPCs, and 500 AOs. These include CNSP, CNAP, SUBPAC, NECPAC, CNATRA, CNFJ, CNFK, PEARL HARBOR, NAVSEA, and 13 Level 5 entities that report directly to Level 3.*

What expectations/requirements do you have for Level 4? *Level 4 is expected to submit reports on time.*

How often do you communicate with them, and by what means? *We hold team meetings with Level 4 and report directly to Level 5 once a month.*

What are the expectations/requirements of Level 2 for Level 3? *Level 2 expects Level 3 to pass policy updates to Level 4.*

Which instructions guide your actions in your role? *Our actions are guided by NAVSUP 4200.99C, with a D version in development.*

Have you issued any policies, and have there been any subsequent changes? *PACFLT IOD is still in progress. Level 4 has its own IOP tailored to its platforms. NAVSUP Policy is general and does not fit all situations.*

How frequently are these policies updated, and how are the changes communicated? *Policies are updated as needed and communicated via email, telephone, team meetings, and conference calls, and posted on the CCPMD website, including PCANs.*

What challenges do you foresee in the GCPC Program? *Challenges include personnel rotation, particularly active duty, which requires continuous training. In CNAP commands, MCOs, who are AOPCs, rotate annually. Delinquency issues arise from incorrect LOAs or insufficient funding. TL should be verified before card certification to prevent suspension, but ship connectivity is often an issue. Significant changes in Supply Management systems (R Supply to ERP to NOSS) have not been matched with corresponding updates in the GCPC process.*

What are your recommendations to improve the program? *Utilize U.S. Bank's direct ordering function, which is currently underutilized; Increase awareness of NAVSUP 4200.99C and streamline guidance from FAR, DFAR, and local commands into a one-stop shop for training; Modernize the GCPC program by implementing a cellphone app, updating technology, and incorporating mobile banking; Innovate processes for ships to account for their connectivity limitations compared to shore commands.*

(17) Respondent #17 (HL2)

Do you train ATG auditors? *No, we do not have a connection with ATG. NAVSUP Mech handles that.*

Please tell me more about training. *Ideally, all GCPC participants complete their training, which includes initial training, annual training, and refresher training every two years.*

How are policy updates distributed? *Policy updates at a higher level are issued under the direction of the Under Secretary of Defense.*

Is there a checklist for grading GCPC? *CCPMD relies on Levels 3 and 4 to manage their GCPC programs, allowing each unit to tailor the program to their needs.*

Is there any training from NAVSUP for ATG auditors grade ship GCPC? *No, there is no such training provided.*

Who is responsible for the upkeep of the GCPC instruction? *Level 3 is responsible for maintaining the GCPC instruction.*

What else should we consider when trying to improve the process?

No issues are reported to Level 2 about violations; CCPMD operates at the DOD level, with instructions given locally to NAVSUP at the Level 3 echelon.

Insight on Demand: CCPMD has access to see all approving officials but does not track administrative discrepancies.

Higher authorities should be held liable for fraud and misuse.

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