



CROSS-AGENCY TRANSITION TEAM WHITE PAPER

SUBJECT: NSSC Working Capital Fund (WCF) Payments

Issue

The NASA FY 2010 Appropriations Bill provides that NASA's Cross-Agency Support Funds (CASX) are limited to a one-year period of availability and will expire on September 30, 2010. This paper addresses the requirements for funding NSSC Working Capital Fund (WCF) Payments.

During FY 2010, the Centers, HQ Operations, HQ OIG, and HQ OCIO will use CASX22010D to make payments into the NSSC WCF to cover both services consumed and training requested. All NSSC services are continuing and recurring and, therefore, are considered severable, with the exception of training purchases, which tend to be non-severable (see the Training Funding whitepaper for guidelines regarding funds for training). In past practice, Centers and HQ obligated two-year appropriated funding to make an advanced payments to the NSSC WCF in August of the current fiscal year for planned consumption of NSSC services and training requests in October-November of the upcoming fiscal year. Now that similar funds in FY 2010 are valid for only one year, and given that NSSC services are generally severable, the advanced funding in August for October-November services and unspecified training requests would not meet the requirements of the bona fide needs rule, with the exception of training events that are considered a bona fide need in FY 2010 (generally, those which occur in October-November and must be fully funded when the training is approved).

Guidance

The use of CASX22010D funds to make WCF payments for NSSC services is only valid for FY 2010 consumption by the Centers, HQ Operations, HQ OIG, and HQ OCIO through September 30. The August advance funding for October-November NSSC services will not be processed this year. Monthly IPACs will begin in May 2010 for the balance of FY 2010. Training requests processed through the NSSC for events in October-November will be handled in accordance with separate guidance for funding training with CASX22010D.

With respect to billing and liquidating advanced funding of FY 2010 WCF payments, final FY 2010 billing will not be available until late October. In years past, any advanced funding balance remaining after final billing was carried forward as a credit against the new FY funding requirements for each Center. This process cannot be used for CASX22010D since it expires on October 1. To minimize the obligated balance remaining on September 30, the NSSC will request monthly advanced funding via IPACs from the Centers and HQ starting May 2010. Adjustments to accommodate over and under utilization of projected consumption will be applied month-to-month leading up to September 15. This process

Special Note: Although these white papers provide general guidance on the application of the Bona Fide Needs rule to common situations, you should still review your specific circumstances with local procurement, finance, and legal specialists. GAO has repeatedly emphasized that what constitutes a bona fide need of a particular fiscal year depends largely on the facts and circumstances of each particular case. Also note that while this guidance was developed to address the issues arising from the change to a one-year appropriation for CAS, it is also applicable to other expiring appropriations.

change leaves only September 16-30 consumption estimated and should significantly decrease the amount of obligated CASX22010D funds that expire on October 1. For the procurement of training for specific training events in Oct-Nov, the NSSC can accept PY 2010 advanced funding in the Aug-Sep timeframe in accordance with the guidance included in the Training white paper. Any unearned expired funds provided for NSSC services or training purchases will be returned to the Centers for processing according to Agency guidance.