

CHANGE REQUEST COVER SHEET

Change Request Number: 12-111

Date Received: 7/10/2012

Title: Separation of Duties in PRISM

Name: Tim Eckert

Phone: (202) 267-7527

Policy OR Guidance: Guidance

Section/Text Location Affected: T3.2.1A.5 and T3.2.1A.6

Summary of Change: Requirement that the Fund Certifier and the Approving Official for a given requisition cannot be the same person

Reason for Change: Change requested by FAA Finance consistent with segregation of duty norms

Development, Review, and/or Concurrence: Finance; Acquisition Policy Division; Procurement Legal; and Contracting workforce at HQ, Service Areas and Centers

Target Audience: Program Offices

Potential Links within FAST for the Change: None

Briefing Planned: No

ASAG Responsibilities: None

Potential Links within FAST for the Change: None

Links for New/Modified Forms (or) Documents (LINK 1) [null](#)

Links for New/Modified Forms (or) Documents (LINK 2) [null](#)

Links for New/Modified Forms (or) Documents (LINK 3) [null](#)

SECTIONS EDITED:

Procurement Guidance:

T3.2.1 - Procurement Planning

Procurement Request (PR)

Section 6 : Requisition Approval Levels [\[Old Content\]](#)[\[New Content\]](#) [\[RedLine Content\]](#)

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Section 5 : Funds Certification [\[Old Content\]](#)[\[New Content\]](#) [\[RedLine Content\]](#)

SECTIONS EDITED:

Section 6 : Requisition Approval Levels

Old Content: Procurement Guidance:

T3.2.1 - Procurement Planning

Procurement Request (PR)

Section 6 : Requisition Approval Levels

a. Only designated FAA employees can approve a requisition. Approval levels are tied to the total estimated amount of the requisition to be approved, as follows:

(1) *Washington Headquarters*

(a) Over \$500,000--Office Head, Director, Product or Service Team Lead, or equivalent or higher position.

(b) Over \$250,000 to \$500,000--Division Manager or equivalent position.

(c) Up to \$250,000--Branch Manager or equivalent position.

For Washington Headquarters, an Office Head, Director, Product or Service Team Lead, or equivalent position, as applicable, may delegate via memorandum approval levels differing from the above.

(2) *Service Areas, Regions, and Centers.* Organizations approving requisitions within service areas, regions, and centers may establish written local requisition approval levels. Program officials should contact their local contracting office for information about approval levels.

b. Key duties and responsibilities for requisitioners, fund certifiers, approving officials, and those obligating funds (i.e. COs or others with delegated procurement authority) must be separated among individuals. Due to local conditions, some duties may need to be provided by the same individual; however the following conditions will always apply in the processing of a requisition:

(1) An individual must never perform all duties;

- (2) A requisitioner may be the fund certifier for the same requisition;
- (3) An approving official and/or fund certifier may perform both approval and fund certification for the same requisition;
- (4) A requisitioner must not be the approving official and/or CO for the same requisition; and
- (5) A CO must never be the approving official or requisitioner for the same requisition.

c. Requisition approvers should refer to PRISM guidance and business processes found at the PRISM website (<https://intranet.faa.gov/prism/training/guideindex.htm> **FAA only**).

New Content: Procurement Guidance:

T3.2.1 - Procurement Planning

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b. Key duties and responsibilities for requisitioners, fund certifiers, approving officials, and those obligating funds (i.e. COs or others with delegated procurement authority) must be separated among individuals. Due to local conditions, some duties may need to be provided by the same individual; however the following conditions will always apply in the processing of a requisition:

- (1) An individual must never perform all duties;

- (2) A requisitioner may be the fund certifier for the same requisition;
- (3) The approving official and the fund certifier for any requisition must be separate individuals;
- (4) A requisitioner must not be the approving official and/or CO for the same requisition; and
- (5) A CO must never be the approving official or requisitioner for the same requisition.

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Red Line Content: Procurement Guidance:

T3.2.1 - Procurement Planning

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- (3) ~~An~~ **The** approving official and/or ~~the~~ fund certifier ~~may perform both approval and fund for certification~~ **any requisition for the same requisition must be separate individuals;**
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Section 5 : Funds Certification

Old Content: Procurement Guidance:

T3.2.1 - Procurement Planning

Procurement Request (PR)

Section 5 : Funds Certification

- a. The requisition must include funds certification if it commits funds to be obligated later on a contractual instrument. Funds certification verifies funds are reserved and certified as available, or funds are to be deobligated on an award or decommitted on a requisition. Funds need not be certified on individual requisitions when "bulk funding" is used for Blanket Purchase Agreements (BPA).
- b. The person certifying funds must be designated in writing in accordance with written procedures of the organization issuing the requisition, and must be instructed by that organization on his or her responsibilities, duties and authority limits.
- c. An authorized requisitioner or approver may also certify funds when local conditions, such as remoteness or a small facility, make it necessary, *provided*: written local procedures authorize this practice and establish reasonable maximum dollar levels for combined funds certification and approval or requisitioning authority, and include monitoring and oversight procedures to ensure propriety of all such actions.
- d. Additional guidance and related business processes for funds certification can be found at the PRISM website (<https://intranet.faa.gov/prism/training/guideindex.htm> **FAA only**).

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