

NATIONAL WEATHER SERVICE INSTRUCTION 70-212

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Financial Management

Financial Management, NWSPD-70-2

NWS PROCUREMENT CONTROLS

NOTICE: This publication is available at: <http://www.nws.noaa.gov/directives/>.

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SUMMARY OF REVISIONS: This directive supersedes NWSI 70-212, “NWS Procurement Controls” dated February 28, 2015. Changes were made to reflect the NWS Headquarters reorganization effective April 1, 2015.

The changes are as follows:

- Pg4 added NWS Property Manager to thresholds table
- Added the following Portfolio Budget Officers to threshold table:
 - NWS Assistant Property Manager exceeding \$25K
 - Corresponding CFO1 FMC Analyst exceeding \$25K
- Updated 4.0 to except Grants
- Attached an example Bona Fide Need Statement (Appendix B and Appendix C)
- Added section 4.1: Documentation/Justification of appropriated fund intent/purpose for Financial Assistance

Signed

John E. Potts

Chief Financial Officer/Chief
Administrative Officer

9/08/2017

Date

NWS Procurement Controls

Contents:	Page:
1. Purpose.....	2
2. Scope.....	2
3. Procedures and Responsibilities	2
3.1 Staff Roles and Responsibilities	2
3.2 Designated Funds Certifying Official Positions	3
3.3 Funds Certification and Requisition Approval	3
4. Bona Fide Need Statement.....	4
4.1 Documentation/Justification of appropriated fund intent/purpose for Financial Assistance....	5
Appendix A NWS Fund Certifiers and Backups	6
Appendix B Certification of Bona Fide Need Example	7
Appendix C Documentation/Justification Template	8

1. Purpose

This procedure implements Acquisition Alert 14-02, “NOAA Internal Control for Funding Approval, Certification and Obligation” and establishes NWS approval hierarchy for Acquisitions, Grants, Agreements, and the Bona Fide Need Statement.

2. Scope

This procedure applies to all NWS Acquisitions, Grants, and Inter-Agency Agreements above the micro-purchase limit. For purchases below the new micro-purchase limit using a purchase card, please reference [NWS Directive 1-709](#) and [News Flash for NOAA CHs and AOs](#).

3. Procedures and Responsibilities

NOAA Acquisitions and Grants (AGO) issued new internal control guidance regarding purchases of products and services to ensure separate approval for bona fide need, funds availability and obligation. Refer to the revised Acquisition Alert (AA) 14-02 “NOAA Internal Control for Funding Approval, Certification and Obligation” [AA 14-02](#). The guidance outlines responsibilities for Requisitioners, Funds Certifying Official and Contracting Officers. It requires the NWS Chief Financial Officer (CFO) to authorize FCOs in writing to certify funds as to availability and suitability for the intended purpose.

3.1 Staff Roles and Responsibilities

- **Requisitioner** - Creates the requisition document, enters all pertinent data elements, and shares the requisition document with the Bona Fide Need Certifier.
- **Bona Fide Need Certifier (BFNC)** - Certifies bona fide need for the product or service being purchased is in the public interest and is applicable for the appropriation to be utilized. The BFNC shall be organizationally detached from the FCO and the CO to ensure an independent and unbiased certification. The Requisitioner and the BFNC do not need to be organizationally detached. The BFNC may retain the role and responsibility of the Requisitioner, if desired.
- **Funds Certifying Official (FCO)** - Certifies that sufficient funds are available in the identified appropriation and suitable for the intended purpose. The FCO shall be organizationally detached from the requisitioner, BFNC, and the CO to ensure an independent and unbiased certification. The FCO shall be authorized in writing by the NWS CFO to certify funds as to availability and suitability for the intended purpose. The NOAA CFO has delegated this authority to the line offices.
- **Contracting Officer (CO)** - Obligates the government pursuant to a procurement contract. The CO shall be organizationally detached from the requisitioner, BFNC, and the FCO to ensure an independent and unbiased certification. The CO shall be authorized in writing by the Bureau Procurement Official to obligate the government.

3.2 Designated Funds Certifying Official Positions

Each FMC Director must identify annually their FCO employees by name to the CFO, or within 5 business days of a new appointment/change in staff. See Appendix A for a listing of FCO names. The following NWS positions are established as FCOs per section 3.1.

- Office of the Assistant Administrator (AA): OAA Budget Officer and budget analyst backup
- Eastern Region (ER): Budget Officer and budget analyst backup
- Southern Region (SR): Budget Officer and budget analyst backup
- Central Region (CR): Budget Officer and budget analyst backups
- Western Region (WR): Budget Officer and budget analyst backup
- Alaska Region (AR): Budget Officer and budget analyst backup
- Pacific Region (PR): Budget Officer and budget analyst backup
- National Centers for Environmental Prediction (NCEP): Budget Officer and budget analyst backup
- Office of Planning and Programming for Service Delivery (OPPSD): Budget Officer and budget analyst backup
- Office of Facilities (OF): Budget Officer
- Office of Observations (OBS): Budget Officer and budget analyst backups
- Office of Central Processing (CP): Budget Officer and budget analyst backup
- Office of Dissemination (DISS): Budget Officer
- Office of Science and Technology Integration (STI): Budget Officer and budget analyst backup
- Office of Chief Operating Officer (OCCO): Budget Officer and budget analyst backup
- Analyze, Forecast, and Support Office (AFS): Budget Officer and budget analyst backup
- Office of Water Prediction (OWP): Budget Officer and budget analyst backup

As budget authority is delegated at the NWS FMC level, FCOs should reside at the FMC Director's organization, not field, center, or headquarters division sub-units. Additional FCO positions and/or different FCO positions other than those listed above may be approved only by the CFO via written justification from the FMC Director.

3.3 Funds Certification and Requisition Approval

The following individuals must be added to the routing list for approval of all c.requests, grants, and inter-agency agreements requiring signature. Zero dollar requisitions¹ require certification and approval. However, administrative modifications, requisitions for deobligation, and Permanent Change of Station (PCS) packages are excluded from this requirement.

¹ [Acquisition Alert 15-03](#) issued May 4, 2015 states the use of "zero dollar" purchase requisitions, e.g, (a) (1) "when the procurement lead time is such then it requires initiation of a procurement in the-then current fiscal year with contact award to be made in the following fiscal year." The extenuating circumstances clause under (b) (1) also allows use when the requirement is to exercise an option for a high risk type contract (cost reimbursement, time-and-materials, and labor-hour) or a firm fixed priced contract under a continuing resolution.

Position	Threshold Dollar Amount
FMC Fund Certifying Officer	All procurement actions
And	
FMC Directors OAA Staff Office Directors See note below ¹	Exceeding \$3,500
And	
NWS Property Manager	Equal to or exceeding \$25,000
And	
NWS Deputy CFO	Equal to or exceeding \$25,000
And	
NWS CFO	Equal to or exceeding \$500,000
And	
NWS Deputy Assistant Administrator	Equal to or exceeding \$1,000,000
And	
NWS Assistant Administrator	Equal to or exceeding \$5,000,000

The following individuals should be added to the routing list as a carbon copy of all c.request, grants and inter agency agreements.

Position	Threshold Dollar Amount
NWS Acquisition Liaison	Exceeding \$25,000
Facilities Management Analyst	Exceeding \$25,000 for all ORF and PAC facility-related requisitions
Portfolio Directors	C.Requests originating from a region, NCEP, or OWP
Portfolio Budget Officers	C.Requests originating from a region, NCEP, or OWP
NWS Assistant Property Manager	Exceeding \$25,000
Corresponding CFO1 FMC Analyst	Exceeding \$25,000

4. Bona Fide Need Statement

All requests, excluding grants, must contain documentation of the bona fide need using the standard bona fide need form available on the [NWS Internal Controls page](#).

The bona fide need form must state how the product or service being purchased is in the public interest and is applicable for the appropriation to be utilized. “Adding additional funds to contract” is not a sufficient explanation of a bona fide need. See Appendix B.

¹ NOTE: FMC Directors have the option to delegate up to \$25,000 when a subordinate first line supervisor is a member of the Senior Executive Service (SES). This applies to the National Centers for Environmental Prediction, Office of Observations, and Office of Science and Technology Integration.

For requests with multiple lines of accounting, documentation of rationale and methodology for allocating cost among multiple PPAs must be included. Requisitions including funding sources from other NOAA Line Offices or Staff Offices must include documentation of approval from the corresponding LO/SO CFO.

Forecasting and Advanced Acquisition Planning System (FAAPS) number must be referenced on the bona fide need form for all procurements equal to or exceeding \$150,000.

4.1 Documentation/Justification of appropriated fund intent/purpose for Financial Assistance

All NWS grant and cooperative institute requests submitted in the Grants On Line system must contain documentation of the bona fide need using the Documentation/Justification of appropriated fund intent/purpose for Financial Assistance form (see appendix C).

The government does not have to establish a "bona fide need" to execute a grant as no goods or services are received, however from an appropriations law standpoint, agencies still have the responsibility to ensure grant obligations are being made in accordance with appropriations intent. This form establishes the appropriate internal control and documentation of this intent.

Appendix A

NWS Fund Certifiers and Backups:

Office	Fund Certifier	Fund Certifier Backup
Office of the Assistant Administrator	Shelia Foster	Laura M.Glockner, Iris Daclan.
Eastern Region	Richard Cochrane	Jane Healey
Southern Region	Jerry Owen	Michael Gallant
Central Region	Whitney Harris	Rhonda Bunch
Western Region	Tyler Nelson	Alice Hunt
Alaska Region	Jacqueline Reinhart	Lisa Fair
Pacific Region	Janet Nix	Sherry Kazunaga
National Centers for Environmental Prediction	Adena Fritz	None
Office of Planning Programming for Service Delivery	Shelia Foster	Laura M.Glockner
Office of Facilities	Wanda Bradley	Cindy Shaffer

National Weather Service

Certification of Bona Fide Need, Appropriate Use & Funds Availability

Requisition number: (e.g., NWW3200-16-00003)

1. **Purpose:** (briefly describe what is being procured and why)
2. **Time Period:** (what period of performance is being funded? if not fully funding - why not?)
3. **Fund Code(s), Portfolio(PPA)/Program Code(s) and Names with corresponding \$ Amounts:** (e.g. 1033, 04-10-50-001, Observations, Systems Engineering and Support: \$150,000)
4. **Grand Total \$ Amount :**
5. **Provide FAAPS number if procurement is over \$150K:**
6. **Briefly describe how this procurement supports the Portfolio(s)/Program(s) above:**
7. **If more than one source of funds is being used, describe and document the cost allocation methodology (list all Fund Codes, Portfolios(PPA) and Programs by name as appropriate). Attach and refer to supporting information if necessary, e.g. statements of work or cost allocation spreadsheet:**
8. **FMC, Org3 Name:** (e.g., Office of Observations, Surface and Upper Air Division)
9. **Name of Requisition Approver:** (First & Last Name of Lowest Level Approver)
10. **Title of Requisition Approver:** (Title of Lowest Level Approver)

Requisition Approver's Statement of Bona Fide Need:

I certify the goods and/or services described above are being acquired to meet a legitimate (bona fide) need existing or arising in the fiscal year in which the obligation will occur. I further certify the funds cited are appropriate for this use and are available for immediate obligation.

Signature: _____ **Date:** _____

Appendix C Documentation/Justification Template

National Weather Service

Documentation/Justification of appropriated fund intent/purpose for Financial Assistance

Requisition number: (e.g., NA18NWS4670045)

11. **Purpose:** (Briefly describe the intent/purpose of the grant or financial assistance)

12. **Period of Availability:** (What is the total period of performance of the grant or financial assistance award, and what is the timeframe that these funds will cover?)

13. **Fund Code(s), Portfolio(PPA)/Program Code(s) and Names with corresponding funding amounts:** (e.g. 1033, 04-50-30-001, Science & Technology Integration, Improve Warning & FCST Effectiveness: \$150,000)

14. **Total Amount Requested:**

15. **Briefly describe how this financial assistance supports the Portfolio(s)/Program(s) above:** (Be sure to refer to Table 1 of the Appropriations Reference Manual (ARM) for the program's description and related activities and explain how the work correlates to the program's description.)

16. **If more than one source of funds is being used, describe and document the cost allocation methodology (list all Fund Codes, Portfolios (PPA) and Programs by name as appropriate). Attach and refer to supporting information if necessary, e.g. statements of work or cost allocation spreadsheet:**

17. **FMC, Org3 Name:** (e.g., Science & Technology Integration, Improve Warning & FCST Effectiveness)

18. **Name of Approver:** (First & Last Name of Lowest Level Approver)

19. **Title of Approver:** (Title of Lowest Level Approver)

Approver's Statement:

I certify the funds cited are appropriate for this use and are available for immediate obligation.

Signature: _____ **Date:** _____