

**NATIONAL WEATHER SERVICE INSTRUCTION 70-212  
OCTOBER 26, 2022**

**Financial Management  
Financial Management Policy, 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 April 14, 2021. The following changes were made to:

- NWS OCFO delegates review and approval of procurement requests of up to \$500K to Portfolio/FMC directors.
- Increase from \$25K to \$100K, the Directors’ ability to delegate to subordinate first line supervisors when they are members of the Senior Executive Service (SES).
- The FMC Director has the authority to approve zero dollar purchase requests to meet acquisition deadlines to add funding and/or execute subsequent CLINs on previously awarded contracts. Once annual appropriations/funding is received, all funded purchase requests should follow the procurement approval thresholds.
- Replace CBOT# with Procurement Forecast ID. PRISM AAP replacing CBOT system starting FY23.

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10/26/2022

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Date

**NWS Procurement Controls**

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**1. Purpose**

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

**2. Scope**

This procedure applies to all NWS Acquisitions in C.Request/Prism, Grants, and Inter-Agency Agreements. For purchases below the new micro-purchase limit using a purchase card, please reference [NWS Directive 1-709](#) and [NOAA AGO SmartPay3](#). For additional information, please see [NWS Directive 70-211, “Agreements”](#).

**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), “NOAA Internal Control for Funding Approval, Certification and Obligation”, [AA 14-02](#). The guidance outlines responsibilities for Requisitioners, Funds Certifying Officials (FCOs) and Contracting Officers (COs). 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.
- **Property Manager (PM)** - Reviews C.Requests valued at \$250K and above to ensure proper use of object class codes for procurements. In addition, the PM ensures that real property, accountable property, and internal use software are properly identified in the procurement and that all Construction Work in Progress (CWIP) criteria are consistently applied. For requests that do meet the criteria, the PM should ensure the Financial Management Center (FMC) submits appropriate documentation.
- **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 their FCO employees by name to the CFO annually, or within five (5) business days of a new appointment/change in staff. See [FCO Table](#) for a listing of FCO names. The following NWS positions are established as FCOs per section 3.1:

- Office of the Assistant Administrator (OAA): OAA Budget Officer and budget analyst backup.
- Eastern Region (ER): Budget Officer and budget analyst backup.
- Southern Region (SR): Administrative Division Chief, Budget Officer or Budget Analyst backups.
- Central Region (CR): Administrative Division Chief, Budget Officer or Budget Analyst backups.
- Western Region (WR): Administrative Division Chief, Budget Officer or Budget Analyst backups.
- Alaska Region (AR): Administrative Division Chief, Budget Officer or Budget Analyst backups.

- Pacific Region (PR): Budget Officer and Admin Division Chief 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 and budget analyst backup.
- 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 and FCO backup.
- 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 (AFSO): 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, whose signature requirement is denoted with an "X" in the table below, must be added to the routing list for approval of all C.Requests, grants, and inter-agency agreements requiring signature. Zero-dollar requisitions<sup>1</sup> require certification and approval levels based on the dollar amount of the proposed contract and not on zero dollars.

Administrative modifications, requisitions for de-obligation, and Permanent Change of Station (PCS) packages are excluded from this requirement. However, note that procurement approval thresholds for zero-dollar purchase requests should only be followed for new or re-competed awards. Zero-dollar purchase requests do not need to be routed for approval beyond the FMC Director in order to meet acquisition deadlines to add funding and/or execute subsequent CLINs on previously awarded contracts. Once annual appropriations/funding is received, all funded purchase requests should follow the procurement approval thresholds listed in the table below.

<b>Threshold Dollar Amount:</b>	<b>FMC Fund Certifying Official</b>	<b>FMC Directors<sup>1</sup></b>	<b>Property Manager</b>	<b>OCFO Designee(s)<sup>2</sup></b>	<b>NWS CFO</b>	<b>NWS Deputy Assistant Administrator</b>	<b>NWS Assistant Administrator</b>
<b>All Procurement Actions  (Ex: No-cost Modifications and Procurement Deobligations)</b>	X						
<b>Up to \$249,999.99</b>	X	X					
<b>Equal To Or exceeding \$250,000 &lt; \$500,000</b>	X	X	X				
<b>Equal To Or exceeding \$500,000 &lt; \$1,000,000</b>	X	X	X		X		
<b>Equal to or exceeding \$1,000,000 &lt; \$5,000,000</b>	X	X	X		X	X	
<b>Equal To Or exceeding \$5,000,000</b>	X	X	X		X	X	X

<sup>1</sup> FMC Directors have the option to delegate up to \$100,000 when a subordinate first line supervisor is a member of the Senior Executive Service (SES).

<sup>2</sup> OCFO Designee(s): This is an OCFO employee designated by the NWS CFO to review and approve acquisitions, grants, and agreements. The OCFO Designee, in addition to the above threshold table, shall review all procurements for OAA Staff Offices, regardless of value.

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

Position	Threshold Dollar Amount
<a href="#">Facilities Management Analyst</a>	\$25,000 and greater for all ORF and PAC facility-related requisitions
<a href="#">Portfolio Directors</a>	C.Requests originating from a region, NCEP, or OWP
<a href="#">Portfolio Budget Officers</a>	C.Requests originating from a region, NCEP, or OWP
<a href="#">Corresponding CFO1 FMC Analyst</a>	\$500,000 and greater

**4. Bona Fide Need Statement**

All requests \$25K and greater, 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. The statement, “Adding additional funds to contract,” is not considered to be a sufficient explanation of a bona fide need. See Appendix B.

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 Line Office (LO)/Staff Office (SO) CFO.

The Procurement Forecast ID number (formerly CBOT or FAAPS) must be referenced on the bona fide need form for all procurements equal to or exceeding \$250K.

**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 B).

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.

## 4.2 Supplemental Appropriation

Occasionally, NWS receives supplemental appropriations with specific programmatic and/or investment use. These funds should be explicitly identified in the Bona Fide Need Statement separate from regular annual appropriations.

On the Bona Fide Need Statement and within the documentation/justification of appropriated funds intent/purpose for Financial Assistance forms:

- For Question #3, the supplemental appropriation should be identified along with the project code and associated projects.
- For Question #5, include an additional statement regarding how the funds are consistent with the supplemental appropriation.

**Appendix A**  
**Certification of Bona Fide Need Example**

**National Weather Service**  
**Certification of Bona Fide Need and Appropriate Use of Funds**  
**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 Procurement Forecast ID (formerly CBOT or FAAPS) number if procurement is over \$250K:**
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.*

**Signature: \_\_\_ Date: \_\_**

**Appendix B  
Documentation/Justification Template**

**National Weather Service**

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

**Requisition number:** (e.g., NA18NWS4670045)

1. **Purpose:** (Briefly describe the intent/purpose of the grant or financial assistance.)
2. **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?)
3. **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)
4. **Total Amount Requested:**
5. **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.)
6. **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:**
7. **FMC, Org3 Name:** (e.g., Science & Technology Integration, Improve Warning & FCST Effectiveness.)
8. **Name of Approver:** (First & Last Name of Lowest Level Approver)
9. **Title of Approver:** (Title of Lowest Level Approver)

**Approver's Statement:**

*I certify the funds cited are appropriate for this use.*

**Signature: \_\_\_\_\_ Date: \_\_**