



Acquisition Management System Change Request Form

Change Request Number:

(To be completed by secretariat)

25-04

Title:

T3.2.1.4 CFO Authorization Update

Select the type of Change Request:

*Policy changes require FAE endorsement.

Guidance

Impacted AMS Category. Choose from drop down selections. If additional categories or sections are impacted, submit a separate CR form for each.

Section(s) impacted by CR:

Category

Guidance

Procurement Guidance T3.2.1.4 Chief Financial Officer Requirements

PART 1: ENDORSEMENTS

**Manager, Acquisition Policy Branch
Endorsement:**

AAP-110, Procurement Policy Branch



Approved



Disapproved

Electronic Signature/Date:

**STEPHEN
BRENDAN
MANGAN**

Digitally signed by STEPHEN
BRENDAN MANGAN
Date: 2025.01.08 14:35:56
-06'00'

**Acquisition System Advisory Group
(ASAG) Chairperson Endorsement:**



Approved



Disapproved

Electronic Signature/Date:

**MICHELLE
G BRUNE**

Digitally signed by
MICHELLE G BRUNE
Date: 2025.01.10
11:42:07 -05'00'

**Acquisition Policy and Oversight (AAP)
Director Endorsement:**



Approved



Disapproved

Electronic Signature/Date:

**JAKE LENO
LEWIS**

Digitally signed by
JAKE LENO LEWIS
Date: 2025.01.10
12:26:12 -05'00'

**FAA Acquisition Executive (FAE)
Endorsement:**

*Only required for Policy Changes



Approved



Disapproved

Electronic Signature/Date:

PART 2: GENERAL INFORMATION

Change Request (CR) Number: 25-04

Date Received: 1/10/25
(To be completed by secretariat)Summary
and Reason
for Change:

Pursuant to the direction of the Office of Investment Planning and Analysis, Acquisition Oversight Division (AFI-500), revisions are made to AMS Guidance T3.2.1.4 Chief Financial Officer Requirements, to conform to updated related procedure. In addition to administrative changes throughout the Guidance Section, changes include:

(1) the removal of T3.2.1.4A.2 Capitalization of Assets;

(2) the removal of references to the now retired CPST Tool (see AMS Policy Alert dated Nov. 27, 2024); a revision to paragraph i. to clarify the CFO review and approval process for non-support and support service packages for new and follow-on awards;

(3) the removal of language pertaining to the pre-work required to obtain CIO signature as such requirements are addressed in the CFO Desk Guide; and

(4) an update to the new Simplified Ceiling Increase Requirement. In addition to these specified revisions, further revisions throughout this subsection are made to improve clarity and provide specified guidance on the up to date requirements for receiving CFO approvals related to the authorization for Procurement Requests.

Corresponding changes are being made in Procurement Samples and Procurement Templates.

Initiator Contact Information:

Name:
Tiffany SmithPhone:
1-(973) 803-3406Organization Name:
Office of Invest. Planning and Analysis, Acq. Over.Routing Code:
AFI-500ASAG Member Contact
InformationName:
Stephen ManganPhone:
1-(405) 954-4137

Development, Review, and Concurrence:

AAP, AGC, AFI-500, CFO, AAQ

Target Audience:

FAA Acquisition Workforce

ASAG Briefing: ☐ YES ☒ NO
(To be completed by secretariat)
Date: 1/10/25

ASAG Responsibilities:
Awareness

AEB Briefing: ☐ YES ☒ NO
(To be completed by secretariat)
Date: 1/10/25

AEB Responsibilities:
Awareness.

PART 3: FAST PUBLICATION INFORMATION



Validation of other impacted FAST locations: I confirm I have validated all other portions of the website and will submit additional CR's for any other impacted sections as necessary.

Section/Text Location:

Procurement Guidance T3.2.1.4 Chief Financial Officer Requirements

Links:

<https://fast.faa.gov/docs/procurementGuidance/guidanceT3.2.1.4.pdf>

Redline Validation:

NOTE: The redline version must be a comparison with the current published FAST version.



I confirm I used the latest published version to create this change/redline.



This is new content.

Attachments:

Redline and final documents.

Other Files:

N/A.

T3.2.1.4 - Chief Financial Officer Requirements Revised 1/2008

A Chief Financial Officer Approvals and Other Requirements Revised 1/2006

1 Authorization for Procurement Request Revised ~~4/2023~~4/2025

~~2 Capitalization of Assets~~Reserved Revised ~~7/2020~~4/2025

B Clauses Revised 10/2007

C Procurement Forms Revised 9/2021

D Procurement Samples Revised ~~4/2023~~4/2025

E Procurement Templates Revised ~~4/2023~~4/2025

F Procurement Tools and Resources Revised 4/2023

T3.2.1.4 - Chief Financial Officer Requirements Revised 1/2008

A Chief Financial Officer Approvals and Other Requirements Revised 1/2006

1 Authorization for Procurement Request Revised 4/20234/2025

a. The Administrator, in a memorandum dated August 11, 2005, directed the Chief Financial Officer (CFO) to exercise greater control and fiscal oversight over FAA contracting by specifically giving the CFO approval authority over all proposed procurement actions of \$10 million or more. ~~The CFO approved an increase to the CFO Approval authority from \$10 million to \$15 million or more in a memorandum dated March 15, 2023.~~ This control and fiscal oversight were further clarified when the CFO, in the Administrator-delegated role as FAA's liaison to the DOT Office of Inspector General (OIG), provided the official FAA response in a memorandum dated September 15, 2006, to OIG Report Number FI-2006-072, "Audit of Federal Aviation Administration's RESULTS National Contracting Service." To accomplish the greater control and fiscal oversight, FAA program offices must submit these proposed procurement actions for CFO review to the Office of Investment Planning and Analysis, Acquisition Oversight Division (AFI-500), early enough in the acquisition process so that CFO participation can be effective. Review of potential commitments that have already been negotiated or otherwise finalized to the extent that there is little left to do but execute the document does not provide the CFO opportunity for effective contributions.

The CFO approved an increase to the CFO Approval authority from \$10 million to \$15 million or more in a memorandum dated March 15, 2023. The CFO has approval authority over all proposed procurement actions of \$15 million or more per AMS Policy 3.2.1.4.2.

b. The CFO approval requirement applies to procurement actions for supplies, equipment, materials, systems, services, construction, real property (e.g., utilities), or other items where the total potential contract value or contract ceilings, including options, would be \$15 million or more.

c. CFO approval is required on all original actions of \$15 million or more that would result in ~~one~~any of the following:

- (1) ~~New~~new contract, including letter contract;
- (2) ~~New~~new agreement (interagency, intra-agency, not-to-exceed orders, other transaction, or cooperative agreement);
- (3) ~~Basic~~basic ordering agreement (BOA)/blanket purchase agreement (BPA) where the potential value equals or exceeds \$15 million as well as any individual orders on a BOA or BPA that equals or exceeds \$15 million;
~~and/or~~
- (4) ~~Other~~other procurement ~~actions~~action or any other binding commitment, such as a lease.

(4)

d. CFO approval is required on all modification actions (except as noted in paragraph e., below) to existing contracts, orders, or agreements where the following applies:

- (1) ~~Anyany~~ individual modification or combination of modifications, to an existing contract of less than \$15 million, which increases the total value or ceiling to \$15 million or more;
- (2) ~~any~~ ^{Any} individual modification or combination of modifications previously not approved by the CFO to a contract with a ceiling or value of \$15 million or more, that increases the base value (the total ceiling or value previously approved by the CFO) by the lesser of either 15 percent or \$15 million.

Note: The 15 percent is to be applied to a “base value,” which is the value for the contract or other type of agreement that the CFO has approved. This value is set at two distinct events:

(a) at the time of initial approval of the planned contract or other agreement; and

(b) when CFO approval of modifications is received, the base value is reset to include the value of the modifications, and for contracts awarded before October 1, 2005, the base value is the contract ceiling or value that includes modifications accrued through September 30, 2005.

- (3) Any modification to an existing contract of \$15 million or more that significantly changes the statement of work. (The specific conditions involved with this approval will vary according to several factors, including the magnitude of the change to the contract scope of work/requirements. ~~The Office of Investment Planning and Analysis~~ (See AMS Guidance T3.10.1A5a.(5) “Addition of work outside of contract’s scope”). AFI-500 is available for consultation with any program office to discuss questions concerning these conditions).

e. The CFO review and approval is not required for incremental funding actions under contracts, orders, or agreements; or exercising of priced options that were included in the total estimated contract value as part of a procurement action previously reviewed and approved by the CFO. Also, modifications for incremental funding or exercise of priced options under contracts awarded before October 1, 2005, do not need CFO approval ~~as long as if~~ there is no change in scope, contract ceiling, or contract value.

f. Procurement actions must not be split to avoid CFO approval of actions of \$15 million or more.

g. For procurements that meet the threshold for CFO review, market research and analysis is

required. It needs to be conducted in time to be documented in the package submitted to ~~the Office of Investment Planning and Analysis~~ AFI-500 for CFO approval. The level of market analysis should be commensurate with the size and complexity of the acquisition (see AMS Procurement Guidance T3.2.1.2)

h. The Contracting Officer (CO) must not release a request for offer (RFO) prior to receiving CFO approval. This requirement applies to both competitive and non-competitive procurements. (This paragraph relates to the timing of the CFO approval and does not override the descriptions in paragraphs b. through g. of what requires CFO approval.)

~~i. CFO Automated Tool. Effective December 1, 2022, all submittals for CFO approval must be through the CFO Automated Tool “CPST CFO Package Submission Tool” at Primavera Portfolio Management Propose (faa.gov) (FAA only). This tool covers all CFO Approval Requirements Procurement Templates currently in use and provides for the submittal of required supporting documentation. Click on the link above to create a new CFO package and request training. If a submitter experiences technical difficulties submitting a request via the tool, they must notify AFI 500 via the AFI 500 team mailbox at 9 ABA CFO Package Review@faa.gov for resolution.~~

~~j.i.~~ CFO review and approval process for non-support and support service procurements is as follows:

- (1) The evaluation process for non-support and support service packages is as follows for New and Follow-On Awards:

~~a)(A)~~ The program office may contact ~~the Office of Investment Planning and Analysis~~ AFI-500 staff to schedule an appointment to discuss the CFO evaluation process and ask questions specific to the particular contract package to be evaluated before preparing the package. This meeting is at the option of the program office but recommended.

~~b)(B)~~ The CFO review and approval process officially begins with the submission to ~~the Office of Investment Planning and Analysis (AFI-500)~~ of a complete package that contains the following:

- ~~1. The approval of the requester (usually the program or project manager);~~
 1. Completed CFO Package Signature Page and Requirements Form:
New or Follow on (see Procurement Samples located on FAST)

Program or Project manager

- ~~• The approval of the head.~~

- ~~2. FAA Head~~ of the line of business or staff office;

- ~~• The approval of the~~

- Acquisition and Fiscal Law Division (AGC-500) attorney approval.

• CO approval (support services only).

3. • Chief Information Officer (CIO) approval.

4. • The Chief Financial Officer (CFO) approval of a procurement attorney;

v. 2. A completed Completed acquisition checklist (located in the CFO Automated Tool described above);

vi. 3. A completed Completed CFO business case; (see CFO Desk Guide on AFI-500 homepage).

7. A copy of the statement of work; and

4. A supported independent government cost estimate (IGCE) Copy of the Statement of Work/Performance Work Statement/Statement of Objectives/Leases.

viii. 5. Supported IGCE with a narrative identifying sources of information and explaining methods and assumptions. The IGCE must be ~~crossed~~cross-referenced to the planned Section B CLIN structure of the solicitation and to the ~~statement of work~~acquisition materials in subitem x. above (see the IGCE Handbook located in Procurement Guides and Handbooks on FAST).

~~Once the Office of Investment Planning~~

6. Acquisition Support Review Board (ASRB) Signature Page (applicable only to support services procurements) (see AMS Guidance T3.8.2).

7. Joint Resources Council (JRC) ACAT Designation Form (required for non-support procurements with JRC approval and for support services procurements valued at more than \$100 million.

(C) For additional information on the Support Contract Review Board (SCRB) evaluation process (exclusively for support services procurements) coordinated by AFI-500 please review the SOP: Acquisitions Greater Than \$15 Million Standard Operating Procedure and review the “CFO Support Contract Review Board (SCRB) Presentation Template” located in Procurement Templates on FAST.

(2) When there is an individual modification or combination of modifications resulting in an increase to the ceiling of an existing contract (support or non-support services), order, or agreement that meets or exceeds 15 percent or \$15 million (whichever is less) above the originally CFO-approved Total Estimated Procurement Value (TEPV), renewed CFO approval is required. The evaluation process for non-support

and support service packages for ceiling increases is as follows:

(A) The program office may contact AFI-500 staff to schedule an appointment to discuss the CFO evaluation process and ask questions specific to the particular contract package to be evaluated before preparing the package. This meeting is at the option of the program office but recommended.

(B) ~~The Analysis~~ CFO review and approval process officially begins with the submission to AFI-500 of a complete package that contains the following:

1. Completed CFO Package Signature Page and Requirements Form: Ceiling Increases

- Program Manager/Project manager approval.
- FAA Head of line of business/staff office/region approval.
- CFO approval.

2. Signed FAA Head of line of business approval justification memo.

3. SOW/PWS/SOO/Leases.

4. IGCE.

5. Section B.

6. Most recent 90 days of invoices.

7. Business Case; and

8. If applicable, the SSJ upon CO request.

For more detailed information on CFO package requirements for New and Follow-on awards, or Ceiling Increases, please visit the AFI-500 Homepage;

https://my.faa.gov/org/staffoffices/afn/finance/organization/investment/acquisition_oversight

~~e)j. Once AFI-500 receives and accepts the complete package, within 15 calendar days, the program office receives will receive an initial assessment. The initial assessment is usually to identify the package's acceptability for submission, provide may result in questions to clarify items in the submission, and request a sample of IGCE items selected to be substantiated with sources/supporting documentation.~~

~~d)k. If the package is found to have minor deficiencies, the Office of Investment Planning and Analysis staff would~~AFI-500 will recommend actions for the program office to correct the deficiencies or recommend conditions on the approval to address inadequacies. If the package is determined to be significantly inadequate, the program office will be notified of the intention to cancel the evaluation and describe the deficiencies that need to be remedied. The program office would be instructed on what steps were required to resubmit the package.

~~e)l.~~ After the response to the questions ~~and cost estimate sample~~ are determined to be adequate, a recommendation memorandum is sent to the Chief Financial Officer recommending approval or disapproval₂ of the submitted package.

~~f)m.~~ Once the CFO has approved the package, the program office is notified, and a copy of the approval is provided for the program office's record. A copy of the CFO approval must be provided to the ~~contracting officer~~CO for the official eDocs contract file.

~~(2) The evaluation process for support service procurements (also referred to as "support contracts") is as follows:~~

~~a) Support services procurements requiring₁ CFO approval must be reviewed by the Support Contract Review Board (SCRB), which recommends approval or disapproval to the CFO. The purpose of the SCRБ is to simplify and expedite CFO approval of support services acquisitions by adhering to a set processing timetable, while simultaneously obtaining approval from Contracting and Acquisition, Legal Counsel, and the Office of Investment Planning and Analysis.~~

~~b) Support services contracts and acquisitions are those that augment the resources currently provided by the government (FAA), such as technical assistance contracts, systems engineering support, and implementation services. The following items are not considered support services contracts and acquisitions for the purposes of the SCRБ: air traffic control services, telecommunication services, flight services, contract tower, maintenance, and contract weather.~~

~~c) The SCRБ process has two phases. Phase I is a high-level examination of the funding, acquisition strategy and schedule (approval of the Acquisition Strategy Review Board is required prior to the SCRБ Phase I approval). Phase II is a detailed examination of the planned procurement.~~

~~d) Prior to the SCRБ Phase I meeting the following must be completed:~~

~~i. Obtain the approval of the Acquisition Strategy Review Board (ASRB) and submit a complete ASRB approved form;~~

~~ii. Submit a completed acquisition checklist (located in the CFO Automated Tool described above) that is approved by the requester and the head of the line of business;~~

~~iii. Submit a complete set of briefing slides (The "CFO SCRБ Phase I Presentation Template is located in FAST under Procurement Templates").~~

~~e) The SCRБ meeting is conducted every Wednesday morning (except federal holidays) and the above items must be received by the Office of Investment Planning and Analysis by noon the Friday prior to the Wednesday of the meeting.~~

~~f) Prior to preparing the SCRB Phase II package, the program office may contact the staff of the Office of Investment Planning and Analysis to schedule an appointment to discuss the CFO evaluation process and ask questions is specific to the particular package to be evaluated. This meeting is at the option of the program office, but recommended.~~

~~g) The SCRB Phase II process officially begins with the submission to the Office of Investment Planning and Analysis of a complete package which contains the following:~~

- ~~i. The approval of the requester (usually the program or project manager);~~
- ~~ii. The approval of the head of the line of business or staff office;~~
- ~~iii. The approval of a procurement attorney;~~
- ~~iv. The approval of the contracting officer;~~
- ~~v. The approval of the Chief Information Officer (CIO);~~
- ~~vi. A completed acquisition checklist (located in the CFO Automated Tool described above);~~
- ~~vii. A completed checklist, business case;~~
- ~~viii. A copy of the, statement of work; and~~
- ~~ix. A supported independent government cost estimate (IGCE) with a narrative identifying sources of information and explaining methods and assumptions. The IGCE must be cross-referenced to the planned Section B CLIN structure of the solicitation and to the, performance work statement of work.~~

~~h) The Office of Investment Planning and Analysis coordinates with the AFI-1 Investment Planning and Analysis Office on all packages with emphasis on packages associated with the Joint Resources Council (JRC). The coordination is designed to ensure no duplication between the two offices.~~

~~i) Once the Office of Investment Planning and Analysis receives the complete package, within 15 calendar days, the program office receives an initial assessment. The initial assessment is usually to identify the package acceptability for submission, provided questions to clarify items in the submission, and request a sample of IGCE items selected to be substantiated with sources/supporting documentation.~~

~~j) If the package is found to have minor deficiencies, the staff of the Office of Investment Planning and Analysis would recommend actions for the program~~

~~office to correct the deficiencies or recommend conditions on the approval to address inadequacies. If the package is determined to be significantly inadequate, the program office would be notified of the intention to cancel the evaluation and describe the deficiencies that need to be remedied. The program office would be instructed of what steps were needed to resubmit the package.~~

~~k) After the response to the questions and cost estimate sample are determined to be adequate, a recommendation memorandum is sent to the Chief Financial Officer recommending approval or disapproval of the submitted package.~~

~~l) Once the CFO has approved the package, the program office is notified and a copy of the approval is provided for in the program office's record. A copy of the CFO approval must be provided to the contracting officer for the official eDocS contract file.~~

~~k. The program official must provide a copy of the Office of Investment Planning and Analysis' CFO approval note, including all imposed conditions, and the CFO signature page to the contracting officer.~~

~~l. CFO approval is specific to the checklist, business case, statement of work objectives, lease and/or independent government cost estimate (IGCE) provided prior to approval. The criteria below provide guidance on procedures to follow if there are significant changes to the checklist, business case, statement of work and/or IGCE subsequent to such acquisition materials after CFO approval. (For information on acquisitions valued at \$15 million or more see: "Office of Investment Planning and Analysis, Acquisition Oversight Division, AFI-500 Standard Operating Procedures for All Acquisitions of \$15 million or More").~~

- ~~(1) If, after CFO approval, the requirements do not change, but the potential contract award exceeds the IGCE by 15 percent or more, the program office must notify the Office of Investment Planning and Analysis AFI-500 of the difference, provide a memorandum from the head of the line of business or staff office requesting an updated CFO approval, and provide a reconciliation and rationale for the difference and obtain an updated CFO approval prior to contract award.~~
- ~~(2) If, after CFO approval, the requirements do not change, but the potential contract award is less than the IGCE by 15 percent or more, the Contracting Officer CO is permitted to make the award, but the program office must provide the reconciliation and rationale to the Office of Investment Planning and Analysis AFI-500 no later than the date of the contract award.~~
- ~~(3) If, after the CFO approval, there are significant changes to the business case and/or statement of work acquisition materials such as those referenced in this paragraph, the program office must submit to AFI-500, the Office of Investment Planning and Analysis a revised checklist, business case and/or statement of work material(s) for an updated CFO approval. (The specific conditions involved with this approval will vary based upon several factors, including the magnitude of the change to contract scope of work/requirements. The Office of Investment~~

~~Planning and Analysis AFI-500~~ is available for consultation ~~with any program office to discuss questions concerning these conditions-)~~.

- (4) The program office must provide to ~~the Office of Investment Planning and Analysis AFI-500~~ the contract award amount and contract number within 30 days of contract award.

~~m. The Office of Investment Planning and Analysis~~ AFI-500 conducts post CFO approval evaluations and will request information regarding the contract amount, compliance with any conditions/requirements in the CFO's approval, and other information which must be provided to the CFO for follow-up action.

2 ~~Capitalization of Assets~~Reserved Revised 7/20204/2025

~~Capitalization allows FAA to accurately record the value of its assets and to generate reliable information for financial statements required by the Chief Financial Officers Act. The CO and requisitioning/program office personnel are to comply with capitalization requirements and processes outlined in the Financial Manual, Volume 8 Property, Plant, and Equipment, available online (FAA only).~~

B Clauses Revised 10/2007

[view contract clauses](#)

C Procurement Forms Revised 9/2021

Document Name

D- Procurement Samples Revised 1/20234/2025

Document Name
CFO Approval Requirements— SCRB Phase I
CFO Package Signature Page and Requirement Form: New or Follow on Awards
CFO Approval Requirements— SCRB Phase II
CFO Package Signature Page and Requirement Form: Ceiling Increase
CFO Approval Requirements— Nonsupport Service Procurements

E Procurement Templates Revised 1/20234/2025

Document Name
CFO <u>Support Contract Review Board (SCRB-Phase I)</u> Presentation Template
-
CFO SCR B Phase II Presentation Template

F Procurement Tools and Resources Revised 4/2023

Document Name
Memorandum to Request for CFO Concurrence on the proposal to increase \$10 million CFO review threshold to \$15 million