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*"Rummaging in the government's attic"*

Description of document: National Oceanic and Atmospheric Administration (NOAA) Directives or instructions issued to contracting/acquisition staff at NOAA, Feb 2025 to 2026

Requested date: 30-April-2025

Release date: 12-March-2026

Posted date: 23-March-2026

Source of document: Freedom of Information Request  
NOAA FOIA Officer  
National Oceanic and Atmospheric Administration  
Public Reference Facility (SOU1000)  
1315 East-West Highway (SSMC3), Room 9713  
Silver Spring, Maryland 20910  
[FOIA@noaa.gov](mailto:FOIA@noaa.gov)  
[DOC FOIA Public Access link](#)  
[FOIA.gov](http://FOIA.gov)

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UNITED STATES DEPARTMENT OF COMMERCE  
**National Oceanic and Atmospheric Administration**  
ACQUISITION AND GRANTS OFFICE

March 12, 2026

Re: FOIA Request No. DOC-NOAA-2025-000837

This letter is in response to your Freedom of Information Act (FOIA) request received by our office on April 30, 2025, in which you requested a copy of each acquisition directive or guideline or instructions or directions or mandate issued to contracting and/or acquisition staff at NOAA between February 20, 2025 and present.

In response to the Government's Acknowledgement letter sent on January 14, 2026, the requester responded stating to limit their request to direction from the Department of Commerce or NOAA.

We have located twenty-five (25) records responsive to your request. Seventeen (17) responsive records are being released to you in their entirety and the additional eight (8) responsive record contains redactions under exemptions exemption 5 U.S.C. § 552(b) (5), inter-agency or intra-agency communications that are protected by legal privileges, including the deliberative process, attorney-client and attorney work-product privileges; and exemption 5 U.S.C. § 552(b) (6), because they contain private personal information in which an individual's right to privacy outweighs the general public's interest in seeing the personally identifying information.

Your request is now complete.

Based on the above information, this constitutes a partial denial of your request. You have the right to file an administrative appeal if you are not satisfied with our response to your FOIA request. All appeals should include a statement of the reasons why you believe the FOIA response was not satisfactory. An appeal based on documents in this release must be received within 90 calendar days of the date of this response letter at the following address:

Assistant General Counsel for Employment, Litigation, and Information  
U.S. Department of Commerce  
Room 5896  
1401 Constitution Avenue, N.W.  
Washington, DC 20230

An appeal may also be sent by email to [FOIAAppeals@doc.gov](mailto:FOIAAppeals@doc.gov).

For your appeal to be complete, it must include the following items:

- A copy of the original request,
- Our response to your request,

- A statement explaining why the withheld records should be made available, and why the denial of the records was in error.
- “Freedom of Information Act Appeal” must appear on your appeal letter. It should also be written on your envelope, email subject line.

FOIA appeals posted to the email box, or Office after normal business hours will be deemed received on the next business day. If the 90th calendar day for submitting an appeal falls on a Saturday, Sunday or legal public holiday, an appeal received by 5:00 p.m., Eastern Time, the next business day will be deemed timely. FOIA grants requesters the right to challenge an agency's final action in federal court. Before doing so, an adjudication of an administrative appeal is ordinarily required.

The Office of Government Information Services (OGIS), an office created within the National Archives and Records Administration, offers free mediation services to FOIA requesters. They may be contacted in any of the following ways:

Office of Government Information Services  
National Archives and Records Administration  
Room 2510  
8601 Adelphi Road  
College Park, MD 20740-6001  
Email: [ogis@nara.gov](mailto:ogis@nara.gov)  
Phone: 301-837-1996  
Fax: 301-837-0348  
Toll-free: 1-877-684-6448

If you have any questions about your request or the NOAA’s FOIA regulations or procedures, please contact Samantha Galvez at [Samantha.Galvez@NOAA.gov](mailto:Samantha.Galvez@NOAA.gov) or the NOAA FOIA Public Liaison, Tony LaVoi at [843-834-3516](tel:843-834-3516). Please reference FOIA number DOC-NOAA-2025-000837 when contacting us.

Sincerely,

GRAFF.MARK.HYR  
UM.1514447892

Digitally signed by GRAFF.MARK.HYRUM.1514447892  
Date: 2026.03.12 17:25:15 -0400

Mark Graff  
NOAA FOIA Office

## Mandates, Instructions, Guidelines, and Directions for Acquisition and/or Contracting Personnel

### Location of Department of Commerce Office of Acquisition Management Policies

1. Visit <https://www.commerce.gov/oam>
2. Click the drop down menu for “Policy” and then select “Acquisition Policy”
3. Policies issued by the Department of Commerce between February 20, 2025 and present will be found in:
  - a. Procurement Memoranda; and
  - b. Procurement Memoranda (cancelled)



UNITED STATES DEPARTMENT OF COMMERCE  
National Oceanic and Atmospheric Administration  
ACQUISITION AND GRANTS OFFICE

April 30, 2025

MEMORANDUM FOR: Deputy Assistant Administrators  
Staff Office Directors

CC: Acquisition Management Advisory Committee  
Acquisition and Grants Office Personnel

FROM: Jeffrey S. Thomas (b) (6)  
Director

SUBJECT: Acquisition Alert 24-01 Rev 1, Policy for the Professional,  
Scientific, and Technical Services Strategic Sourcing Solution

The purpose of this memorandum is to issue Revision 1 to Acquisition Alert (AA) 24-01, Policy for the Professional, Scientific, and Technical Services Strategic Sourcing Solution (ProTech).

ProTech is a suite of multiple award indefinite delivery-indefinite quantity contract vehicles organized into four domains supporting all of NOAA's Line and Staff Offices: Satellites, Fisheries, Oceans, and Weather. The ProTech Program Management Office administers the ProTech contracting vehicles and assists the Line and Staff Offices with developing requirements and documents to support purchase request packages.

Commerce Acquisition Manual (CAM) Chapter 1307.70, Category Management, was revised on April 21, 2025 to remove ProTech as a mandatory enterprise-wide contract. As a result, AA 24-01 Revision 1 is issued to remove ProTech's mandatory use designation. The use of ProTech is now optional, and no exemptions or waivers are required when procuring outside the ProTech domain vehicles.

Email questions about this update to [AGO.Policy@noaa.gov](mailto:AGO.Policy@noaa.gov).

Attachment

Acquisition Alert 24-01 Rev 1, Policy for the Professional, Scientific, and Technical Services Strategic Sourcing Solution

## ACQUISITION ALERT 24-01 Revision 1

### Policy for the Professional, Scientific, and Technical Services Strategic Sourcing Solution

This Acquisition Alert (AA) is being transmitted to the Acquisition and Grants Office (AGO) and the Deputy Assistant Administrators and Staff Office Directors for dissemination within their respective Line or Staff Office.

#### 1. Purpose

The purpose of AA 24-01 is to update the policy for the Professional, Scientific, and Technical Services (ProTech) strategic sourcing solution for all professional, scientific, and technical services requirements. This policy rescinds AA 19-01 and AA 19-02.

#### 2. Background

The ProTech strategic sourcing solution provides professional, scientific, and technical services through a suite of multiple award indefinite delivery-indefinite quantity (IDIQ) contract vehicles organized into four domains supporting all of NOAA's Line and Staff Offices: Satellites, Fisheries, Oceans, and Weather.

#### 3. Applicability

This AA applies to all NOAA Line and Staff Offices.

#### 4. Policy

The ProTech suite of contract vehicles is a strategic sourcing solution for NOAA. Contracting officers and field delegates, in cooperation with Line and Staff Offices, may leverage the ProTech IDIQ contracts for in-scope requirements, as detailed in this AA.

#### 5. Responsibilities

##### 5.1 ProTech Branch and Program Management Office (PMO)

ProTech is managed by the AGO Corporate Services Acquisition Division. The PMO is responsible for:

- a. Contract administration of all base contracts.
- b. Assisting Line and Staff Offices, after they coordinate with the servicing Acquisition Division, with developing requirements documents such as performance work statements, statements of work, or statements of objectives, and independent government estimates. NOTE: The PMO does not assist with submitting requisition packages to the servicing Acquisition Division.
- c. Providing scope review and capability analysis reports.
- d. Assisting with scope determinations and ordering procedures.
- e. Notifying stakeholders of all ProTech domain awards and maintaining a complete and accurate award list.
- f. Providing and maintaining a ProTech Ordering Guide and streamlined acquisition plan template.
- g. Maintaining the ProTech website, including posting ProTech acquisition forecasts.
- h. Industry engagement and other outreach.

## 5.2 Task Order Contracting Officers<sup>1</sup> (TOCO)

TOCOs are responsible for:

- a. Compliance with the ProTech Ordering Guide.
- b. Managing all contract activities at the task order level, including acquisition planning, issuing solicitations, evaluating offers, award, and post-award administration.
- c. Appointing a task order contracting officer's representative.

## 5.3 Line and Staff Offices

Line and Staff Offices are responsible for:

- a. Submitting complete requisition packages through the PRISM contract writing system.
- b. Coordinating with their servicing Acquisition Division before contacting the PMO for assistance with requirements.

## 6. Acquisition Planning

The Department of Commerce Senior Procurement Executive has approved use of the ProTech Task Order Streamlined Acquisition Plan (see template at Attachment 1). TOCOs will use the ProTech streamlined acquisition plan for all non-fixed-price orders (including hybrid) when the anticipated total life-cycle cost (excluding any contract line items for travel or other direct costs) is expected to be greater than or equal to \$10 million and less than \$75 million. Non-fixed-price orders of \$75 million or more require a formal acquisition plan. Note: Cost reimbursement CLINs solely for travel or ODCs on an otherwise fixed-price acquisition, will be considered fixed-price rather than hybrid. Per Commerce Acquisition Manual 1307.1, a written acquisition plan is not required for fixed-price ProTech orders.

## 7. ProTech Object Classification Code

Requisitioners must annotate the ProTech object classification code on ProTech purchase requisitions. The [Office of the Chief Financial Officer](#) issues guidance about object classification codes. Information about fee-for-service is available on the [Program Office Toolkit](#) page of the AGO website.

## 8. ProTech Websites

The [ProTech public website](#) houses domain-specific information about the master contracts, points of contact, task areas, frequently asked questions, acquisition forecasts, and task order award information. The [ProTech internal website](#) houses the ProTech Ordering Guide, Government-specific policy and templates, training slides, and other useful information.

## 9. Effective Date

This AA is effective on the date of signature and remains in effect until revised or rescinded.

## 10. Points of Contact

<sup>1</sup> Including field delegates.

Email questions about this AA to the Policy and Oversight Division at [AGO.Policy@noaa.gov](mailto:AGO.Policy@noaa.gov). Submit questions about the ProTech strategic sourcing solution to [ProTech.Services@noaa.gov](mailto:ProTech.Services@noaa.gov).

**Attachments**

1. ProTech Streamlined Acquisition Plan Template

## ***PROTECH TASK ORDER STREAMLINED ACQUISITION PLAN TEMPLATE***

*This streamlined acquisition plan may only be used for ProTech task orders.*

In accordance with an approval from the Department of Commerce, NOAA will use the ProTech Streamlined Acquisition Plan template in lieu of the DOC Streamlined Acquisition Plan found in Commerce Acquisition Manual (CAM) 1307.1. Acquisition planners will use the ProTech Streamlined Acquisition Plan for non-fixed-price orders when the total value of the non-fixed price portion (excluding any contract line items for travel or other direct costs) is expected to be greater than or equal to \$10 million and less than \$75 million.

Non-fixed-price ProTech orders of \$75 million or more require a formal acquisition plan. Per CAM 1307.1, an acquisition plan is not required for fixed-price orders against DOC-issued Indefinite Delivery Vehicles.

All current acquisition planning and review policies and procedures are still applicable to the ProTech Task Order Streamlined Acquisition Plan. The acquisition plan review and approval requirements found in CAM 1307.1 and Acquisition Instruction 20-01 (or later versions) apply to the ProTech Task Order Streamlined Acquisition Plan.

All ProTech Streamlined Acquisition Plans require the following reviews and approvals. Task order contracting officers will obtain reviews and approvals in accordance with PRISM policies and procedures.

Program Official - Review  
Budget Official - Review  
Office of General Counsel - Review  
Policy and Oversight Division - Review  
Bureau Chief Information Officer - Approval  
Bureau Procurement Official and Competition Advocate - Approval

Direct questions about the ProTech Streamlined Acquisition Plan template to Jay Standing, Chief, ProTech Branch, Corporate Services Acquisition Division, Acquisition and Grants Office at [Jay.Standing@noaa.gov](mailto:Jay.Standing@noaa.gov) or (301) 628-1368.

# National Oceanic and Atmospheric Administration (NOAA)



## PROTECH TASK ORDER STREAMLINED ACQUISITION PLAN

*(Required for all non-fixed-price orders when the total value of the non-fixed price portion (excluding any contract line items for travel or other direct costs) is expected to be greater than or equal to \$10 million and less than \$75 million. )*

{CLIENT NAME}

{PROGRAM NAME}

{Title of Acquisition}

{DATE}

*This document contains proprietary or source selection information related to the conduct of a federal agency procurement. The disclosure and receipt of this information is restricted by Section 27 of the Office of Federal Procurement Policy Act (41 U.S.C. 2102 et seq). The unauthorized disclosure of this information may subject both the discloser and the recipient to the contractual, civil, and/or criminal penalties as provided by law.*

**PROTECH TASK ORDER STREAMLINED ACQUISITION PLAN**

Servicing Acquisition Division:

Organization Code:

Line or Staff Office:

Line/Staff Office POC:

Project title and description (Including explicit details of the item(s) to be acquired and identifying current contract/  
task/delivery order number, when applicable):

Proposed COR: \_\_\_\_\_ Total Est. Value (including Options): \_\_\_\_\_

FAC-COR Level: \_\_\_\_\_ Certificate Exp. Date: \_\_\_\_\_ Current FY Obligation Amount: \$ \_\_\_\_\_

FAAPS Number: \_\_\_\_\_ NAICS Code:  541712      Obligation Amounts for Each Forecast FY: \$ \_\_\_\_\_  
 541990      \$ \_\_\_\_\_  
 541330      \$ \_\_\_\_\_  
 541620      \$ \_\_\_\_\_  
 541611      \$ \_\_\_\_\_

IRD Number: \_\_\_\_\_ ITIA Number: \_\_\_\_\_

Base Period of Performance: \_\_\_\_\_ Final Period of Performance with Options: \_\_\_\_\_

Contract Type: (FFP, T&M, LH, etc.)      Competitive:  Yes  
 No

Contracting Method: Task order off of the following.      Performance-Based Service Acquisition:  Yes  
 ProTech-\_\_\_\_\_ Domain       No

Type of Set-Aside: \_\_\_\_\_ Basis for Ex. to Fair Opportunity FAR 16.505(b)(2):

Expected SB Size Standard of Vendors: <input type="checkbox"/>	Satellite-1,000 Employees	Exception to Fair Opp. Synopsis Requirements (FAR 16.505(b)(2)):	
(SB, SDVOSB, WOSB, etc.) <input type="checkbox"/>	Fisheries-\$15M		
<input type="checkbox"/>	Weather-\$15M		<input type="checkbox"/> Yes
<input type="checkbox"/>	Ocean-\$15M		<input type="checkbox"/> No

Exc. to Fair Opp. Approving Official      Commercial Item/Service:  Yes  
 and Date Approved: \_\_\_\_\_  No

{Title of Acquisition}

Other elements to enhance the acq. strategy (i.e., environmental considerations, use of high-risk authorities, risks, Section 508, for orders exceeding \$5.5 million the significant factors and subfactors, including cost or price that the agency expects to consider in evaluating proposals, and their relative importance, etc.):

## Milestone Schedule

*Establish schedule to include the following steps as applicable, and any others as appropriate*

mm/dd/yy

1. Market Research Completed
2. Statement of Work/Objectives Completed
3. Small Business Review
4. Major IT Business Case Completed
5. Complete Requisition Package Received
6. Brief Review Boards (e.g., Bureau-level ARB)
7. Information Technology Investment Authority Issued
8. Acquisition Plan and Source Selection Plan Approved
9. Publication of Announcement in GPE
10. Solicitation Review and Clearance (legal, etc.)
11. Issuance of Solicitation
12. Pre-proposal Conference/Site Visit
13. Receipt of Offers
13. Request for Audit
14. Complete Technical Evaluation
15. Receive Audit Reports
16. Competitive Range Determination and Pre-Negotiation Memo Completed
17. Open Negotiations with Offerors in Competitive Range
18. Receive Final Proposals
19. Receive EEO Compliance Review
20. Subcontracting Plan cleared by OSDDBU
21. Final Evaluations Reviewed and Post-Negotiation Memo Completed
22. Source Selection
23. Contract Reviews and Clearances (legal, etc.)
24. Contract Award, including Public Announcement Consideration (FAR 5.303)



UNITED STATES DEPARTMENT OF COMMERCE  
National Oceanic and Atmospheric Administration  
ACQUISITION AND GRANTS OFFICE

MEMORANDUM FOR: Deputy Assistant Administrators  
Staff Office Directors

CC: Acquisition Management Advisory Committee  
Acquisition and Grants Office Personnel

FROM: Rafael Rivera  
Acting Director (b) (6)

SUBJECT: NOAA Implementation of Procurement Memorandums 2026-01  
and 2026-06

This memorandum provides immediate guidance for aligning National Oceanic and Atmospheric Administration (NOAA) acquisition policies and procedures with Procurement Memorandum (PM) 2026-01, “Federal Acquisition Regulation (FAR) Deviation Procedures for Agency Implementation of the Revolutionary FAR Overhaul (RFO)” and PM 2026-06, “Federal Acquisition Regulation (FAR) Class Deviation for FAR Parts 1 through 53 in Support of Executive Order on Restoring Common Sense to Federal Procurement.”

The Federal Acquisition Regulatory Council (FAR Council) recently initiated a comprehensive overhaul, referred to as the RFO, to streamline federal procurement and minimize regulations not strictly based in statute or executive order, as mandated by Executive Order 14275, “Restoring Common Sense to Federal Procurement,” and OMB Memorandum M-25-26, “Overhauling the Federal Acquisition Regulation.” Agencies are expected to adopt the model deviation text issued by the FAR Council and align agency supplements and policies with the RFO.

Subsequently, on December 19, 2025, the Department of Commerce (DOC) issued PMs 2026-01 and 2026-06. PM 2026-06 provides a class deviation for all revised FAR Parts, while PM 2026-01 provides guidance for implementing the Commerce Acquisition Regulation (CAR) and Commerce Acquisition Manual (CAM) to ensure departmental alignment with the new class deviation.

Effective immediately, Contracting Officers shall apply the RFO implementation guidance in PM 2026-01 and the class deviation in PM 2026-06, and any subsequent revisions to these memorandums, to all NOAA Acquisition Alerts (AA), Acquisition Instructions (AI), and the NOAA Acquisition Manual (NAM). The PMs take precedence over any conflicting sections within the AAs, AIs, or NAM. Acquisition policy that is not addressed or superseded by the RFO, as implemented by PM 2026-01 and PM 2026-06, remain in effect.

Contracting Officers must keep their Head of Contracting Office (HCO) informed of any acquisitions where the application of PM 2026-01 or PM 2026-06 significantly alters the project’s risk profile or strategic direction. Early socialization with the HCO is imperative for

actions with larger NOAA acquisition implications to ensure consistency and senior-leadership concurrence.

When utilizing new RFO authorities, Contracting Officers may request a courtesy compliance review from the Policy and Oversight Division for any action no longer subject to mandatory review. Email these requests to [SBPOReviews@noaa.gov](mailto:SBPOReviews@noaa.gov) with 'Courtesy Compliance Review' in the subject line. These submissions do not require an associated BPO Review and Approval Form.

Please direct any questions regarding this memorandum to the Policy and Oversight Division at [AGO.Policy@noaa.gov](mailto:AGO.Policy@noaa.gov).

REFERENCES	FUNCTION	DOC DELEGATION	NOAA DELEGATION
			<u>Head of Contracting Office (HCO)</u>
FAR 1.602-3 CAM 1301.70	Approve the ratification of an unauthorized commitment valued less than \$500,000	BPO	<u>HCO must record ratified actions in the Unauthorized Commitment and Ratification Log</u>  <u>HCO may not redelegate.</u>
FAR 16.301-3(a)(2) CAM 1316.1	In the absence of a written acquisition plan, approve written determination fully explaining the rationale why the use of a cost-reimbursement contract is appropriate	One level above the CO	Branch Chief or higher level  Contracting Officer (CO) for contracts below \$10 million when the base period plus any option periods is less than or equal to three years.
FAR 16.601(d) CAM 1301.70	Approve determination and findings that no other contract type is suitable	BPO	HCO for contracts below \$10 million when the base period plus any option periods exceeds three years. CO and HCO may not redelegate.  BPO for contracts at or above \$10 million, regardless of the length of the contract period.
<u>FAR 8.405-6</u> <u>CAM 1301.70</u> <u>NOAA HCA Delegation of Authority Memorandum</u>	Approve justifications for limiting sources for Federal Supply Schedule orders or BPAs exceeding \$15M but not exceeding \$75M	HCA	BPO
FAR 13.501 CAM 1301.70 NOAA HCA Delegation of Authority Memorandum	Approve justifications for sole source (including brand name) acquisitions or portions of an acquisition requiring a brand name exceeding \$15M but not exceeding \$75M	HCA	BPO
FAR 15.303 CAM 1315.3 NOAA HCA Delegation of Authority Memorandum	Serve as the source selection authority for all competitive negotiated acquisitions with lifecycle costs of \$10M or more when formal source selection procedures are used	HCA	BPO
<u>A121-03, NOAA Formal Source Selection Policy and Procedures</u>	Source selection authority for all competitive negotiated acquisitions with lifecycle costs of \$10 million or more when using formal source selection procedures	**BPO Delegation in accordance with HCA Delegation Memorandum (see above)**	<u>Line Office Assistant Administrators and Staff Office Directors</u>  <u>The Line/Staff Office Director may redelegate to their Deputy Assistant Administrator/Staff Office Director, in writing, using this template.</u>  <u>Use this template to request a different delegation from the BPO.</u>
FAR 16.504 CAM 1316.1 NOAA HCA Delegation of Authority Memorandum	Provide congressional notification within 30 days of single source task/delivery order contract awards in excess of \$100M, including all options	HCA	NOAA Competition Advocate
FAR 16.505 CAM 1301.70 NOAA HCA Delegation of Authority Memorandum	Approve justifications for exception to fair opportunity for orders exceeding \$15M but not exceeding \$75M	HCA	BPO

REFERENCES	FUNCTION	DOC DELEGATION	NOAA DELEGATION
FAR 31.205-6 CAM 1301.70 NOAA HCA Delegation of Authority Memorandum	Establish exceptions to limitation on allowability of compensation for scientists, engineers, or other specialists	HCA	Deputy Under Secretary for Operations (DUSO)
FAR 34.005-6 CAM 1301.70 NOAA HCA Delegation of Authority Memorandum	Reaffirms mission need and program objectives and grants approval to proceed with production of successfully tested major systems	HCA	DUSO
FAR 36.209 CAM 1301.70 NOAA HCA Delegation of Authority Memorandum	Approve construction contracts with architect-engineer firms that designed the project or its subsidiaries or affiliates.	HCA	BPO
FAR 36.609-1 CAM 1301.70 NOAA HCA Delegation of Authority Memorandum	Determination that A&E design within funding limitations are secondary to performance considerations and additional project funding can be expected	HCA	DUSO
FAR 48.104-3 CAM 1301.70 NOAA HCA Delegation of Authority Memorandum	Determine that costs associated with determining collateral savings exceed benefits	HCA	BPO



UNITED STATES DEPARTMENT OF COMMERCE  
**National Oceanic and Atmospheric Administration**  
ACQUISITION AND GRANTS OFFICE

February 28, 2025

MEMORANDUM FOR: Deputy Assistant Administrators  
Staff Office Directors

CC: Acquisition Management Advisory Committee  
Acquisition and Grants Office Personnel

FROM: Jeffrey S. Thomas (b) (6)  
Director

SUBJECT: Acquisition Alert 25-01, NOAA Contracting Authority  
Delegations

The purpose of this memorandum is to issue Acquisition Alert (AA) 25-01, NOAA Contracting Authority Delegations, and to rescind AA 14-03, *NOAA Senior Bureau Procurement Official Delegated Authorities for Review and Approval* and AA 18-03, *Approval Authority for the Use of Certain Contract Types*.

[Commerce Acquisition Manual 1301.70, \*Delegation of Contracting Authority\*](#), provides specific Department of Commerce delegations that correspond to the various contracting delegations outlined in the Federal Acquisition Regulation. Unless specified otherwise, NOAA officials may redelegate functions to others in the organization. AA 25-01 provides NOAA's acquisition delegations that correspond with contracting delegations in CAM 1301.70.

Email questions about this Acquisition Alert to the Policy and Oversight Division at [AGO.Policy@noaa.gov](mailto:AGO.Policy@noaa.gov).

Attachment

Acquisition Alert 25-01, NOAA Contracting Authority Delegations

## ACQUISITION ALERT 25-01

### NOAA Contracting Authority Delegations

This Acquisition Alert (AA) is being transmitted to all the NOAA Heads of Contracting Offices for dissemination within their respective Acquisition Divisions.

1. **Purpose:** The purpose of AA 25-01 is to provide the delegated authorities for approving various contracting actions. This AA rescinds AA 14-03, *NOAA Senior Bureau Procurement Official Delegated Authorities for Review and Approval*, and AA 18-03, *Approval Authority for the Use of Certain Contract Types*.
2. **Background:** [Commerce Acquisition Manual 1301.70, Delegation of Contracting Authority](#), provides specific delegations within the Department of Commerce that correspond to the various contracting delegations outlined in the Federal Acquisition Regulation. Unless specified otherwise, NOAA officials may redelegate functions to others in the organization. Redelegating contracting authorities streamlines processes by lowering approval levels while ensuring that procurement actions receive adequate oversight.
3. **Applicability:** This AA applies to all NOAA Line and Staff Offices.
4. **NOAA Delegations:** NOAA's contracting authority delegations are identified in [Attachment 1](#).
5. **Effective Date:** This AA is effective as of the date signed and remains in effect until superseded or rescinded.
6. **Point of Contact:** Direct questions about this AA to the Policy and Oversight Division at [AGO.Policy@noaa.gov](mailto:AGO.Policy@noaa.gov).

**Fwd: New Contractual Obligations and Purchase Card Transactions for the Bipartisan Infrastructure Law (BIL) and the Inflation Reduction Act (IRA) Funds**

1 message

Jeffrey Hale - NOAA Federal <jeffrey.hale@noaa.gov>  
To: Justin Cofer - NOAA Federal <justin.i.cofer@noaa.gov>

Tue, Feb 25, 2025 at 1:45 PM

Supervisory Contract Specialist  
NOAA Acquisition & Grants Office  
1325 East West Highway, Room 11360  
Silver Spring, MD 20910  
(o) 301-628-1411  
jeffrey.hale@noaa.gov

*We want to hear from you! Take our POD Satisfaction Survey*

----- Forwarded message -----

From: on behalf of Jeffrey S. Thomas - NOAA Federal <jeffrey.s.thomas@noaa.gov>  
Date: Tue, Feb 25, 2025 at 11:49 AM  
Subject: New Contractual Obligations and Purchase Card Transactions for the Bipartisan Infrastructure Law (BIL) and the Inflation Reduction Act (IRA) Funds  
To: \_NOAA AGO DAA Staff Offices <daa.staffoffices@noaa.gov>, \_OFA AGO Division Chiefs <ago.divisionchiefs@noaa.gov>, \_AGO DISTRO TO NOAA CFOS <distro.noaa.cfos@noaa.gov>, Shawna Karlson - NOAA Federal <shawna.karlson@noaa.gov>, Susan Shuback - NOAA Federal <susan.shuback@noaa.gov>, Doug Whiteley - NOAA Federal <doug.whiteley@noaa.gov>  
Cc: Nancy Hann - NOAA Federal <Nancy.Hann@noaa.gov>, Binita Sharma - NOAA Federal <binita.sharma@noaa.gov>, Jeffrey Hale - NOAA Federal <jeffrey.hale@noaa.gov>, ago frontoffice - NOAA Service Account <ago.frontoffice@noaa.gov>

**The following message is sent on behalf of Jeffrey Thomas, Director, AGO**



**MEMORANDUM FOR:** Deputy Assistant Administrators  
Staff Office Directors  
Line and Staff Office CFOs  
AGO Acquisition Division Directors  
Acquisition Management Advisory Council

**FROM:** Jeffrey S. Thomas  
Director, Acquisition and Grants Office (AGO)

**SUBJECT:** New Contractual Obligations and Purchase Card Transactions for the Bipartisan Infrastructure Law (BIL) and the Inflation Reduction Act (IRA) Funds

**DATE:** February 21, 2025

The purpose of this memorandum is to communicate the Department of Commerce requirement and process to obtain approval of all NOAA BIL/IRA funds obligated through contracts and purchase card transactions. This requirement applies to all new contract awards, extension of existing contract awards, agreements with another agency (unrelated to financial assistance work), and all purchase card transactions.

All transactions obligating BIL/IRA funds must be submitted for review and approval using the attached form and instructions. Requests will be prepared and submitted by Line and Staff Office Leadership in coordination with AGO staff. Completed requests will be reviewed by NOAA Leadership and transmitted to DOC Leadership for final approval.

Thank you for your continued support.

Attachments:  
NOAA BIL and IRA Obligation Review and Approval Form

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 **5. BIL\_IRA Obligation Review and Approval Form.pdf**  
911K

**NOAA BIL/IRA OBLIGATION REVIEW AND APPROVAL FORM**

<b>SECTION A. REQUESTER INFORMATION</b>	
<b>NOAA Line or Corporate Services Office</b> Select	<b>Requisition Number (if applicable)</b>
<b>Total Award Value</b>	<b>Amount of BIL or IRA funds</b>
<b>Contract</b> <b>Task Order</b> <b>Modification</b> <b>Purchase Order</b> <b>Purchase Card</b>	
Enter contract award number or solicitation number	
<b>Provide the statute or authority and brief description of the work or need</b>	
<b>Provide a link to the folder containing the contract and required supporting documents</b>	
<b>Requester digital signature certifies none of the requirements conflict with the Administration's priorities and guidelines</b>	
<b>Requester Name and Date</b>	
<b>SECTION B. REVIEW AND APPROVAL</b>	
<b>Line Office Deputy Assistant Administrator</b>	
<b>Name:</b>	
<b>Signature:</b>	
<hr/>	
<b>Bureau Procurement Official</b>	
<b>Name:</b>	
<b>Signature:</b>	

**NOAA BIL/IRA OBLIGATION REVIEW AND APPROVAL FORM**

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**NOAA Office of General Counsel**

**Name:**

**Signature:**

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**NOAA Leadership**

**Name:**

**Signature:**

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# NOAA BIL/IRA OBLIGATION REVIEW AND APPROVAL FORM

## INSTRUCTIONS

The Department of Commerce (DOC), through the Office of Acquisition Management (OAM) requires all new contract awards, extension of existing contract awards, agreements with another agency (unrelated to financial assistance work), and purchase card transactions obligating BIL or IRA funding of any dollar amount require the approval of NOAA and DOC Leadership. A detailed review of the requirement is required before submission to ensure none of the requirements conflict with the Administration's priorities and guidelines. Any uncertainties regarding potential conflicts should be flagged when submitting the package for review.

*Note:* A consolidated list of requirements may be submitted for review and approval, however, each item in the list must include all required documents mentioned in the instructions below.

1. The requester shall process the NOAA BIL/IRA Obligation Review and Approval Form prior to the obligation using the following steps:
  - a. The requester will complete all fields in Section A and submit the form and package to their respective Line Office Deputy Assistant Administrator or Staff Office Director for review and approval.
  - b. The Line Office Deputy Assistant Administrator or Staff Office Director will review, and if approved, the requester shall send the form and package to the NOAA Bureau Procurement Official (BPO) via [SBPOReviews@noaa.gov](mailto:SBPOReviews@noaa.gov) and cc: [Jeffrey.S.Thomas@noaa.gov](mailto:Jeffrey.S.Thomas@noaa.gov)
  - c. The NOAA BPO will review and submit the form and package to NOAA Office of General Counsel (OGC) and NOAA Political Leadership.
  - d. NOAA OGC will coordinate with DOC OGC Contract Law Division and NOAA Political Leadership for concurrence and return the form to the BPO.
  - e. The BPO will send the form and package to the DOC Office of Acquisition Management for the Senior Procurement Executive and DOC Political Leadership final approval.
  - f. Once all approvals have been obtained, an email with the approval will be provided to the requester.
  
2. At a minimum the requesting package submission shall include:
  - a. The full contract (or solicitation number if no contract has been issued), task order, modification, or purchase order plus the performance work statement or statement of work and any supporting sole or limited source justification; and
  - b. Authority for the work, including whether it is statutory based and whether the actual work is required under the statute/authority or is permissive allowing for Agency discretion in making implementation decisions.

**NOAA Obligation Approval Request Process**

1 message

on behalf of Jeffrey S. Thomas - NOAA Federal &lt;jeffrey.s.thomas@noaa.gov&gt;

Fri, Mar 7, 2025 at 2:24 PM

To: \_NOAAAGO DAA Staff Offices &lt;daa.staffoffices@noaa.gov&gt;, \_AGO DISTRO TO NOAA CFOS &lt;distro.noaa.cfos@noaa.gov&gt;

Cc: Nancy Hann - NOAA Federal &lt;Nancy.Hann@noaa.gov&gt;, Laura Grimm - NOAA Federal &lt;laura.grimm@noaa.gov&gt;, \_AGO Personnel &lt;AGO.Personnel@noaa.gov&gt;, \_OFA AMAC &lt;amac@noaa.gov&gt;, ago frontoffice - NOAA Service Account &lt;ago.frontoffice@noaa.gov&gt;

**The following message is sent on behalf of Jeffrey Thomas, AGO Director**

**MEMORANDUM FOR:** Deputy Assistant Administrators  
Staff Office Directors  
Chief Financial Officers

**CC:** Deputy Under Secretary of Operations  
Chief of Staff  
Acquisition and Grants Office Personnel  
Acquisition Management Advisory Committee

**FROM:** Jeffrey S. Thomas  
Director, Acquisition and Grants Office

**SUBJECT:** NOAA Obligation Approval Request Process

Effective immediately, the Department of Commerce (DOC) is pausing all purchases using Federal funds, including Government purchase card transactions and contract action awards <sup>[1]</sup>. The purpose of this memorandum is to provide NOAA's process for complying with DOC guidance for implementing [Executive Order 14222, Implementing the President's "Department of Government Efficiency" Cost Efficiency Initiative](#), and for requesting approval to use Federal funds.

This approval process is intended for purchases that are necessary to sustain our mission including the preservation of life, property, and safety. Before making any purchase or awarding any contract action, the requirements office must submit the transaction for NOAA Leadership approval. Requesters will use the [NOAA Obligation Approval Request Form](#) to request necessary reviews and final approval. Once completed, the form will automatically route to the requester's Line Office Deputy Assistant Administrator or Staff Office Director for review and concurrence. With their concurrence, the action will proceed to the front office for adjudication.

In accordance with the Department of Commerce's interim approval, the purchase cardholders listed in Attachment 2 will retain their current card limits and the ability to execute actions consistent with the justifications provided.

This process does not apply to purchases using any amount of Bipartisan Infrastructure Law and Inflation Reduction Act (BIL/IRA) funds. When BIL/IRA funds will be used, requirements offices will follow the NOAA and Department of Commerce (DOC) Leadership approval process, issued on February 21, 2025.

**Attachments:**

1. NOAA Obligation Approval Request Form Instructions
2. NOAA Approved Purchase Card Holder Listing

<sup>1</sup> Contract means a mutually binding legal relationship obligating the seller to furnish the supplies or services (including construction) and the buyer to pay for them. It includes all types of commitments that obligate the Government to an expenditure of appropriated funds and that, except as otherwise authorized, are in writing. In addition to bilateral instruments, contracts include (but are not limited to) awards and notices of awards; job orders or task letters issued under basic ordering agreements; letter contracts; orders, such as purchase orders, under which the contract becomes effective by written acceptance or performance; and bilateral contract modifications. Contracts do not include grants and cooperative agreements covered by 31 U.S.C.6301, et seq.

**2 attachments**

 **Attachment 1, NOAA Obligation Approval Form Instructions.pdf**  
96K

 **Attachment 2, NOAA Approved Purchase Cardholder Listing.pdf**  
232K

## NOAA Obligation Approval Request Form Instructions

Requirements offices must use the [NOAA Obligation Approval Request Form](#) to obtain NOAA Leadership approval to obligate Federal funds before making any purchase, including Government purchase card transactions and contract action awards<sup>1</sup>. Before submitting the Obligation Approval Request Form, requestors must conduct an indepth review of the requirement and ensure that none of the requirements conflict with the Administration's priorities and guidelines. Requesters should note any uncertainties regarding potential conflicts in the Other Information section of the form.

This approval process is intended for purchases that are necessary to sustain NOAA's mission including the preservation of life, property, and safety.

Exceptions: Do not use this form for any of the following:

1. Purchases using any amount of Bipartisan Infrastructure Law and Inflation Reduction Act (BIL/IRA) funds. When BIL/IRA funds will be used, requirements offices will follow the NOAA and Department of Commerce (DOC) Leadership approval process, issued on February 21, 2025.
2. Purchases made by cardholders identified on the NOAA Approved Purchase Card Holder Listing that are consistent with the justifications provided to the Department of Commerce.

### Obligation Approval Request Form Completion Instructions

1. The requester reviews the requirement and ensures that the purchase does not conflict with the Administration's priorities and guidelines.
2. After requirements review, the requester completes and submits the [NOAA Obligation Approval Request Form](#). Upon form submission, automated notices will be sent to the reviewing and approving officials as follows:
  - a. The requester's Line Office Deputy Assistant Administrator or Staff Office Director will review, and concur.
  - b. The NOAA Bureau Procurement Official (BPO), Jeffrey Thomas, will concur. NOTE: Servicing Acquisition Divisions do not need to review this form or package before it is sent to the BPO. The BPO will send required information and documentation to NOAA Leadership.
  - c. NOAA Leadership will review and approve.

<sup>1</sup> Contract means a mutually binding legal relationship obligating the seller to furnish the supplies or services (including construction) and the buyer to pay for them. It includes all types of commitments that obligate the Government to an expenditure of appropriated funds and that, except as otherwise authorized, are in writing. In addition to bilateral instruments, contracts include (but are not limited to) awards and notices of awards; job orders or task letters issued under basic ordering agreements; letter contracts; orders, such as purchase orders, under which the contract becomes effective by written acceptance or performance; and bilateral contract modifications. Contracts do not include grants and cooperative agreements covered by 31 U.S.C.6301, et seq.

Overall Impact of Reductions	
DUSSO	(b) (5)
OFA	(b) (5)
OMAO	(b) (5)
NOS	(b) (5)
NWS	(b) (5)
NMFS	(b) (5)
NESDIS	(b) (5)
OAR	(b) (5)
PMEL	NA - PMEL is an OAR Laboratory. PMEL should be included under OAR in future data-calls.
OSC	(b) (5)

DUS

Alt Name	CH Name	Staff Office	SPL	MPL	Card Count	Impact	Purchase Category	Examples
(b) (6)		DUS	\$ 3,500.00	\$ 10,000.00	1	(b) (5)	Other essential activities	(b) (5)
		DUS	\$ 3,500.00	\$ 10,000.00	1		Other essential activities	

OFA (staff offices)

AO Name	CH Name	Staff Office	SPL	MPL	Card Count	Purchase Category	Examples
(b) (6)	(6)	CAO	\$ 3,500.00	\$ 10,000.00	1		(b) (5)
		CAO	\$ 3,500.00	\$ 10,000.00	1		
		CAO	\$ 3,500.00	\$ 35,000.00	1		
		OHCS	\$ 3,500.00	\$ 10,000.00	1	Other essential activities	
		OHCS	\$ 3,500.00	\$ 10,000.00	1	Other essential activities	
		OCIO	\$ 10,000.00	\$ 50,000.00	1	Both	
		OCIO	\$ 3,500.00	\$ 20,000.00	1	Both	
		OCIO	\$ 10,000.00	\$ 50,000.00	1	Life and property	
		OCIO	\$ 3,500.00	\$ 25,000.00	1	Both	
		OCIO	\$ 3,500.00	\$ 10,000.00	1	Life and property	
		OCIO	\$ 25,000.00	\$ 100,000.00	1	Life and property	
		OCIO	\$ 3,500.00	\$ 20,000.00	1	Life and property	
		OCIO	\$ 3,500.00	\$ 30,000.00	1	Life and property	

QAR

AD Name	CH Name	SPL	RPL	Card Count	EOC Exclusions - All Commissioned Officer Corps	Purchase Category	Examples	Job Series of Cardholders	Comments
<b>(b) (6)</b>	<b>(6)</b>	\$ 3,500.00	\$ 10,000.00	1		Both	<b>(b) (5)</b>	301	Essential
		\$ 3,500.00	\$ 10,000.00	1	Yes	NOAA Corps officer O-3			
		\$ 25,000.00	\$ 100,000.00	1		Other essential activities		ZA-0343	Essential - OAR Field Delegate
		\$ 100,000.00	\$ 200,000.00	1		Both		1101	Essential - OAR Field Delegate
		\$ 3,500.00	\$ 20,000.00	1		Both		ZP-1301	Essential
		\$ 3,500.00	\$ 10,000.00	1		NOAA Corps			
					Yes				
		\$ 3,500.00	\$ 10,000.00	1		NOAA Corps			
					Yes				
		\$ 50,000.00	\$ 150,000.00	1		Both		1101	Essential - OAR Field Delegate
		\$ 3,500.00	\$ 20,000.00	1		Both		ZP-0210	Essential
		\$ 3,500.00	\$ 20,000.00	1		Other essential activities		ZP-0301	Essential
		\$ 3,500.00	\$ 20,000.00	1		Yes			
		\$ 3,500.00	\$ 15,000.00	1		Other essential activities		303	Essential
		\$ 3,500.00	\$ 10,000.00	1		Other essential activities		303	Essential
		\$ 3,500.00	\$ 10,000.00	1		Other essential activities		ZP-1301	Essential
		\$ 3,500.00	\$ 10,000.00	1		Both		ZP-0310	Essential
		\$ 3,500.00	\$ 10,000.00	1		Other essential activities		ZA-0341	Essential
		\$ 3,500.00	\$ 10,000.00	1		Other essential activities		ZS-0318	Essential
		\$ 20,000.00	\$ 150,000.00	1		Both		1101	Essential - OAR Field Delegate
		\$ 10,000.00	\$ 100,000.00	1		Both			Essential - OAR Field Delegate
		\$ 3,500.00	\$ 20,000.00	1		Both		ZP-1310	Essential
		\$ 3,500.00	\$ 10,000.00	1		Other essential activities		1410	Essential
		\$ 3,500.00	\$ 10,000.00	1		Other essential activities		343	Essential
		\$ 3,500.00	\$ 10,000.00	1		Both		ZP-0303	Essential
		\$ 10,000.00	\$ 50,000.00	1		Both		ZA-0343	Essential - Elevated Purchase Card Limit
		\$ 3,500.00	\$ 10,000.00	1		Both		343	Essential
		\$ 3,500.00	\$ 10,000.00	1		Other essential activities		ZA-0301	Essential
		\$ 3,500.00	\$ 15,000.00	1		Both		ZT-1311	Essential
		\$ 10,000.00	\$ 35,000.00	1		Both		301	Essential - OAR Field Delegate
\$ 3,500.00	\$ 10,000.00	1		Both	1301	Essential			
\$ 10,000.00	\$ 80,000.00	1		Both	343	Essential - OAR Field Delegate			
\$ 3,500.00	\$ 10,000.00	1		Other essential activities	301	Essential			
\$ 10,000.00	\$ 50,000.00	1		Both		Essential - Elevated Purchase Card Limit			
\$ 3,500.00	\$ 20,000.00	1		Both	0301	Essential			
\$ 10,000.00	\$ 80,000.00	1		Both	ZA-0500	Essential - Elevated Purchase Card Limit			
\$ 10,000.00	\$ 50,000.00	1		Both	ZA-0301	Essential - Elevated Purchase Card Limit			
\$ 10,000.00	\$ 150,000.00	1		Both	ZA-0301	Essential - Elevated Purchase Card Limit			
\$ 3,500.00	\$ 20,000.00	1		Both	ZA-0342	Essential			
\$ 10,000.00	\$ 50,000.00	1		Both		Essential - Elevated Purchase Card Limit			

OAR

AO Name	CH Name	BPL	BPL	Card Count	EO 13526(a) - CE Continuation of Officer Corps	Personnel Category	Examples	Job Series of Cardholders	Comments
(b) (6)	(6)	\$ 10,000.00	\$ 50,000.00	1		Both	(b) (5)	ZH-0342	Essential - Elevated Purchase Card Limit
		\$ 3,500.00	\$ 30,000.00	1		Both		ZY-1311	Essential
		\$ 3,500.00	\$ 20,000.00	1		NOAA Corps			
					Yes				
		\$ 3,500.00	\$ 30,000.00	1		Other essential activities		ZH-0343	Essential
		\$ 3,500.00	\$ 10,000.00	1		Other essential activities		ZH-0343	Essential
		\$ 3,500.00	\$ 10,000.00	1		Both		1340	Essential
		\$ 100,000.00	\$ 200,000.00	1		Both		1101	Essential - OAR Field Operations
		\$ 3,500.00	\$ 25,000.00	1		Both		DB02	Essential
		\$ 3,500.00	\$ 20,000.00	1	47	Yes			

AO Name	CH Name	SPL	MPL	Card Count	EO Exclusion - CH Commissioned Officer Corps	Purchase Category	Examples
(b) (6)	(b) (6)	\$ 3,500.00	\$ 10,000.00	1	Yes	Both	(b) (5)
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Life and property	
		\$ 3,500.00	\$ 10,000.00	1		Life and property	
		\$ 3,500.00	\$ 10,000.00	1		Other essential activities	
		\$ 3,500.00	\$ 10,000.00	1		Life and property	
		\$ 3,500.00	\$ 10,000.00	1	Yes	Life and property	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Other essential activities	
		\$ 3,500.00	\$ 20,000.00	1		Both	
		\$ 3,500.00	\$ 25,000.00	1		Both	
		\$ 3,500.00	\$ 20,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1	Yes	Both	
		\$ 25,000.00	\$ 150,000.00	1		Both	
		\$ 10,000.00	\$ 150,000.00	1		Both	
		\$ 10,000.00	\$ 50,000.00	1		Both	
		\$ 10,000.00	\$ 100,000.00	1		Both	
		\$ 3,500.00	\$ 25,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 20,000.00	1		Both	
\$ 3,500.00	\$ 10,000.00	1		Both			
\$ 3,500.00	\$ 10,000.00	1		Both			
\$ 3,500.00	\$ 10,000.00	1		Both			
\$ 3,500.00	\$ 10,000.00	1		Both			
\$ 3,500.00	\$ 10,000.00	1		Life and property			
\$ 3,500.00	\$ 10,000.00	1		Life and property			

AO Name	CH Name	SPL	MPL	Card Count	EO Exclusion - CH Commissioned Officer Corps	Purchase Category	Examples
(b)	(6)	\$ 3,500.00	\$ 10,000.00	1		Life and property	(b) (5)
		\$ 3,500.00	\$ 10,000.00	1		Life and property	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Life and property	
		\$ 3,500.00	\$ 25,000.00	1		Life and property	
		\$ 3,500.00	\$ 20,000.00	1	Yes	Both	
		\$ 3,500.00	\$ 20,000.00	1		Both	
		\$ 3,500.00	\$ 20,000.00	1	Yes	Both	
		\$ 3,500.00	\$ 10,000.00	1	Yes	Both	
		\$ 3,500.00	\$ 20,000.00	1	Yes	Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1	Yes	Both	
		\$ 3,500.00	\$ 20,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1	Yes	Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 15,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Life and property	
		\$ 3,500.00	\$ 30,000.00	1		Life and property	
		\$ 3,500.00	\$ 10,000.00	1	Yes	Other essential activities	
\$ 3,500.00	\$ 30,000.00	1		Life and property			
\$ 3,500.00	\$ 10,000.00	1		Life and property			
\$ 3,500.00	\$ 30,000.00	1		Both			
\$ 3,500.00	\$ 10,000.00	1		Life and property			
\$ 3,500.00	\$ 10,000.00	1		Life and property			

AO Name	CH Name	SPL	MPL	Card Count	EO Exclusion - CH Commissioned Officer Corps	Purchase Category	Examples
(b)	(6)	\$ 3,500.00	\$ 10,000.00	1		Both	(b) (5)
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1	Yes	Both	
		\$ 3,500.00	\$ 15,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1	Yes	Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 20,000.00	1		Both	
		\$ 3,500.00	\$ 20,000.00	1		Both	
		\$ 3,500.00	\$ 20,000.00	1		Both	
		\$ 50,000.00	\$ 200,000.00	1		Both	
		\$ 3,500.00	\$ 20,000.00	1		Both	
		\$ 3,500.00	\$ 20,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1	Yes	Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1	Yes	Both	
		\$ 3,500.00	\$ 20,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1	Yes	Life and property	
		\$ 3,500.00	\$ 10,000.00	1			
		\$ 3,500.00	\$ 10,000.00	1			
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 20,000.00	1		Both	
		\$ 3,500.00	\$ 20,000.00	1	Yes	Both	
		\$ 3,500.00	\$ 10,000.00	1	Yes	Both	



AO Name	CH Name	SPL	MPL	Card Count	EO Exclusion - CH Commissioned Officer/Corps	Purchase Category	Examples
(b) (6)	(6)	\$ 3,500.00	\$ 10,000.00	1		Both	(b) (5)
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 25,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1	Yes	Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1	Yes	Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 20,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1	Yes	Both	
		\$ 3,500.00	\$ 20,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1	Yes	Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1	Yes	Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 20,000.00	1		Life and property	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1	Yes	Both	
		\$ 3,500.00	\$ 20,000.00	1		Both	
		\$ 3,500.00	\$ 25,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 15,000.00	1		Both	
		\$ 3,500.00	\$ 15,000.00	1		Both	
\$ 3,500.00	\$ 10,000.00	1		Life and property			
\$ 3,500.00	\$ 10,000.00	1		Both			
\$ 3,500.00	\$ 10,000.00	1		Both			
\$ 3,500.00	\$ 10,000.00	1		Both			
\$ 3,500.00	\$ 10,000.00	1		Both			
\$ 3,500.00	\$ 10,000.00	1	Yes	Both			

OMAO

AO Name	CH Name	SPL	MPL	Card Count	EO Exclusion - CH Commissioned Officer/Corps	Purchase Category	Examples
(b) (6)	[REDACTED]	\$ 3,500.00	\$ 10,000.00	1		Both	(b) (5) [REDACTED]
		\$ 3,500.00	\$ 20,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
				133			

AO Name	OH Name	BPL	WPL	Card Class	EU EXEMPTION - CR Commissioned Officer Corps	IMPACT/RISK	Purchase Category	Examples	Program Office
(b) (6)	(6)	\$ 10,000.00	\$ 76,888.88	1		(b) (5)	Both	(b) (5)	NCCOB
		\$ 10,000.00	\$ 100,000.00	1			Both		NCCOB
		\$ 10,000.00	\$ 20,000.00	1			Both		SCS
		\$ 3,500.00	\$ 20,000.00	1	Yes		Both		CO-OPB
		\$ 10,000.00	\$ 35,000.00	1					
		\$ 3,500.00	\$ 1,000.00	1			Both		ORAR
		\$ 3,600.00	\$ 20,000.00	1			Both		DNMS
		\$ 3,500.00	\$ 10,000.00	1	Yes		Responsibility for facilities		NCCOB
		\$ 3,600.00	\$ 20,000.00	1			Both		IMO
		\$ 10,000.00	\$ 50,888.88	1					
		\$ 3,500.00	\$ 10,000.00	1	Yes				
		\$ 3,500.00	\$ 10,000.00	1			Both		ORAR
		\$ 10,000.00	\$ 20,000.00	1			Both		CO-OPB
		\$ 3,500.00	\$ 20,000.00	1	Yes				
		\$ 3,500.00	\$ 40,000.00	1			Other essential activities		CO-OPB
\$ 3,500.00	\$ 10,000.00	1		Both	ORAR				
				16				12	

COOPB	0
CO-OPB	3
WD	1
SCS	1
SCS	5
SCS	0
NCCOB	2
NGS	0
SCS	1
ORAR	1

AD Name	CH Name	SPL	MPL	Card Count	FMC	Is this card critical to "Health & Safety"	EO Redaction - CH Communications Officer Change	Platform Category	Justification
(b) (6)	(b) (6)	\$10,000.00	\$50,000.00	1	AKFSC	Yes		Bank	(b) (5)
(b) (6)	(b) (6)	\$10,000.00	\$50,000.00	1	AKFSC	No		Bank	
(b) (6)	(b) (6)	\$10,000.00	\$50,000.00	7	AKFSC	Yes		Bank	
(b) (6)	(b) (6)	\$10,000.00	\$50,000.00	1	AKFSC	Yes		Bank	
(b) (6)	(b) (6)	\$10,000.00	\$50,000.00	1	GARFO	Yes		Bank	
(b) (6)	(b) (6)	\$10,000.00	\$50,000.00	1	IATC	Yes		Bank	
(b) (6)	(b) (6)	\$10,000.00	\$60,000.00	1	NEFSC	Yes		Bank	
(b) (6)	(b) (6)	\$10,000.00	\$50,000.00	1	NEFSC	Yes		Bank	
(b) (6)	(b) (6)	\$10,000.00	\$150,000.00	1	NEFSC	Yes		Bank	
(b) (6)	(b) (6)	\$10,000.00	\$50,000.00	1	NEFSC	Yes		Bank	
(b) (6)	(b) (6)	\$10,000.00	\$50,000.00	1	NEFSC	Yes		Bank	
(b) (6)	(b) (6)	\$10,000.00	\$75,000.00	1	NEFSC	Yes		Bank	
(b) (6)	(b) (6)	\$10,000.00	\$150,000.00	1	WFSC	Yes		Bank	
(b) (6)	(b) (6)	\$10,000.00	\$150,000.00	1	WFSC	Yes		Bank	
(b) (6)	(b) (6)	\$10,000.00	\$150,000.00	1	WFSC	Yes		Bank	

AO Name	CH Name	SPL	MPL	Card Count	FWC	Is this card critical to "Health & Safety"	EO Redaction - CH Commercial Officer Group	Platform Category	Justification
(b) (6)	(6)	\$3,500.00	\$25,000.00	1	NWFS	Yes		Bank	(b) (5)
		\$10,000.00	\$50,000.00	1	NWFS	Yes		Bank	
		\$3,500.00	\$10,000.00	1	NWFS	Yes		Bank	
		\$3,500.00	\$20,000.00	1	OAA	Yes		Bank	
		\$10,000.00	\$50,000.00	1	OCHO	Yes		Bank	
		\$10,000.00	\$150,000.00	1	OHC	Yes		Bank	
		\$3,500.00	\$50,000.00	1	OLE	Yes		Bank	
		\$10,000.00	\$50,000.00	1	OLE	Yes		Bank	
		\$3,500.00	\$10,000.00	1	OLE	Yes		Bank	
		\$3,500.00	\$10,000.00	1	OLE	Yes		Bank	
		\$10,000.00	\$50,000.00	1	OLE	Yes		Bank	
		\$10,000.00	\$150,000.00	1	OLE	Yes		Bank	
		\$150,000.00	\$300,000.00	1	OLE	Yes		Bank	
		\$3,500.00	\$10,000.00	1	OLE	Yes		Bank	
		\$3,500.00	\$10,000.00	1	OLE	Yes		Bank	
		\$10,000.00	\$50,000.00	1	OLE	Yes		Bank	
		\$3,500.00	\$10,000.00	1	OLE	Yes		Bank	
		\$3,500.00	\$3,500.00	1	OLE	Yes		Bank	
		\$10,000.00	\$50,000.00	1	OMB	Yes		Bank	
		\$10,000.00	\$50,000.00	1	OPR	Yes		Bank	
\$10,000.00	\$50,000.00	1	OSF	Yes		Bank			
\$10,000.00	\$50,000.00	1	OST	Yes		Bank			
\$10,000.00	\$100,000.00	1	PFSC	Yes		Bank			
\$10,000.00	\$150,000.00	1	PFSC	Yes		Bank			

AO Name	CH Name	SPL	MPL	Card Count	FMC	Is this card critical to "Health & Safety"	EO Exclusion - ON Commission Officer Group	Residual Category	Justification
(b)	(6)	\$3,500.00	\$10,000.00	1	PIPO	Yes		Self	(b) (5)
		\$10,000.00	\$50,000.00	1	SEFSC	Yes		Self	
		\$10,000.00	\$50,000.00	1	SEFSC	Yes		Self	
		\$3,500.00	\$10,000.00	1	SEFSC	Yes		Self	
		\$10,000.00	\$50,000.00	1	SEFSC	Yes		Self	

AD Name	CH Name	SPL	MPL	Card Count	FMC	Is this card critical to "Health & Safety"	EO Redaction - CH Communications Officer Change	Redaction Category	Justification
(b) (6)	(b) (6)	\$3,500.00	\$10,000.00	1	SEFSC	Yes			(b) (5)
(b) (6)	(b) (6)	\$75,000.00	\$150,000.00	1	Services multiple FMCs	Yes			(b) (5)
(b) (6)	(b) (6)	\$100,000.00	\$300,000.00	1	Services multiple FMCs	Yes			(b) (5)
(b) (6)	(b) (6)	\$75,000.00	\$300,000.00	1	Services multiple FMCs	Yes			(b) (5)
(b) (6)	(b) (6)	\$150,000.00	\$450,000.00	1	Services multiple FMCs	Yes			(b) (5)
(b) (6)	(b) (6)	\$150,000.00	\$450,000.00	1	Services multiple FMCs	Yes			(b) (5)
(b) (6)	(b) (6)	\$10,000.00	\$100,000.00	1	SWFSC	Yes			(b) (5)
(b) (6)	(b) (6)	\$10,000.00	\$50,000.00	1	SWFSC	Yes			(b) (5)
(b) (6)	(b) (6)	\$3,500.00	\$20,000.00	1	SWFSC	Yes			(b) (5)
(b) (6)	(b) (6)	\$3,500.00	\$15,000.00	1	VCR	Yes			(b) (5)
(b) (6)	(b) (6)	\$3,500.00	\$10,000.00	1	NEFSC	Yes	Yes		(b) (5)
(b) (6)	(b) (6)	\$3,500.00	\$10,000.00	1	NEFSC	Yes	Yes		(b) (5)
(b) (6)	(b) (6)	\$3,500.00	\$15,000.00	1	NEFSC	Yes	Yes		(b) (5)
(b) (6)	(b) (6)	\$3,500.00	\$10,000.00	1	PFSC	Yes	Yes		(b) (5)
(b) (6)	(b) (6)	\$3,500.00	\$10,000.00	1	SEFSC	Yes	Yes	Other restricted activities	(b) (5)
(b) (6)	(b) (6)	\$3,500.00	\$10,000.00	1	SEFSC	Yes	Yes		(b) (5)
(b) (6)	(b) (6)	\$3,500.00	\$10,000.00	1	SWFSC	Yes	Yes		(b) (5)
(b) (6)	(b) (6)	\$3,500.00	\$10,000.00	1	SWFSC	Yes	Yes		(b) (5)
(b) (6)	(b) (6)	\$3,500.00	\$10,000.00	1	SWFSC	Yes	Yes		(b) (5)
(b) (6)	(b) (6)	\$3,500.00	\$10,000.00	1	SWFSC	Yes	Yes		(b) (5)

AO Name	CH Name	SPL	MPL	Card Count	FMC	Is this card critical to "Health & Safety"	Purchase Category	Justification
					41 S * H1	<small>(EO Enforcers - CH Custodial Officers) Cops</small>	<small>Key Care Workers (Green) Essentials (Law Offices / NAAA Care Officers) (Blue)</small>	

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AO Name	CH Name	SPL	MPL	Card Count	EO Exclusion - CH Commissioned Officer Corps	Purchase Category	Examples
<b>(b) (6)</b>		\$ 3,500.00	\$ 3,500.00	1		Both	<b>(b) (5)</b>
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 25,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 7,500.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 7,500.00	1		Both	
		\$ 3,500.00	\$ 20,000.00	1		Both	

AO Name	CH Name	SPL	MPL	Card Count	EO Exclusion - CH Commissioned Officer Corps	Purchase Category	Examples
(b) (6)		\$ 3,500.00	\$ 10,000.00	1		Both	(b) (5)
		\$ 3,500.00	\$ 7,500.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Other essential activities	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 7,500.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 40,000.00	1		Both	
		\$ 3,500.00	\$ 25,000.00	1		Both	
		\$ 3,500.00	\$ 50,000.00	1		Both	
		\$ 3,500.00	\$ 50,000.00	1		Both	
		\$ 3,500.00	\$ 25,000.00	1		Both	
		\$ 3,500.00	\$ 15,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
\$ 3,500.00	\$ 40,000.00	1		Both			

AO Name	CH Name	SPL	MPL	Card Count	EO Exclusion - CH Commissioned Officer Corps	Purchase Category	Examples
(b) (6)	(6)	\$ 3,500.00	\$ 7,500.00	1		Both	(b) (5)
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 5,000.00	1		Both	
		\$ 3,500.00	\$ 7,500.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 10,000.00	\$ 50,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 2,500.00	\$ 5,000.00	1		Both	
		\$ 3,500.00	\$ 7,500.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 1,000.00	\$ 2,000.00	1		Both	
		\$ 3,500.00	\$ 7,500.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	

AO Name	CH Name	SPL	MPL	Card Count	EO Exclusion - CH Commissioned Officer Corps	Purchase Category	Examples
(b) (6)		\$ 1,000.00	\$ 2,000.00	1		Both	(b) (5)
		\$ 3,500.00	\$ 7,500.00	1			
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 5,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	

AO Name	CH Name	SPL	MPL	Card Count	EO Exclusion - CH Commissioned Officer Corps	Purchase Category	Examples
(b)	(6)	\$ 3,500.00	\$ 7,500.00	1		Both	(b) (5)
		\$ 3,000.00	\$ 7,500.00	1		Both	
		\$ 1,000.00	\$ 2,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 20,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 35,000.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 7,500.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	

AO Name	CH Name	SPL	MPL	Card Count	EO Exclusion - CH Commissioned Officer Corps	Purchase Category	Examples
(b) (6)		\$ 3,500.00	\$ 7,500.00	1		Both	(b) (5)
	\$ 3,500.00	\$ 10,000.00	1		Both		
	\$ 3,500.00	\$ 7,500.00	1		Both		
	\$ 3,500.00	\$ 10,000.00	1		Both		
	\$ 3,500.00	\$ 7,500.00	1		Both		
	\$ 10,000.00	\$ 50,000.00	1		Both		
	\$ 3,500.00	\$ 10,000.00	1				
	\$ 3,500.00	\$ 10,000.00	1				
	\$ 3,500.00	\$ 7,500.00	1		Both		
	\$ 3,500.00	\$ 10,000.00	1		Both		
	\$ 3,500.00	\$ 20,000.00	1		Both		
	\$ 3,500.00	\$ 10,000.00	1		Both		
	\$ 3,500.00	\$ 10,000.00	1		Both		
	\$ 3,500.00	\$ 10,000.00	1		Both		
	\$ 3,500.00	\$ 40,000.00	1		Both		

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AO Name	CH Name	SPL	MPL	Card Count	EO Exclusion - CH Commissioned Officer Corps	Purchase Category	Examples
(b) (6)		\$ 3,500.00	\$ 10,000.00	1		Both	(b) (5)
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 5,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 25,000.00	\$ 150,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	

AO Name	CH Name	SPL	MPL	Card Count	EO Exclusion - CH Commissioned Officer Corps	Purchase Category	Examples
(b) (6)							(b) (5)
		\$ 3,500.00	\$ 40,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 7,500.00	1		Both	
		\$ 3,500.00	\$ 15,000.00	1		Other essential activities	
		\$ 3,500.00	\$ 15,000.00	1		Other essential activities	
		\$ 3,500.00	\$ 15,000.00	1		Other essential activities	
		\$ 3,500.00	\$ 15,000.00	1		Other essential activities	
		\$ 3,500.00	\$ 15,000.00	1		Other essential activities	
\$ 3,500.00	\$ 7,500.00	1		Both			

NWS

AO Name	CH Name	SPL	MPL	Card Count	EO Exclusion - CH Commissioned Officer Corps	Purchase Category	Examples
(b) (6)		\$ 3,500.00	\$ 7,500.00	1		Both	(b) (5)
		\$ 3,500.00	\$ 7,500.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 7,500.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 5,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 15,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	

NWS

AO Name	CH Name	SPL	MPL	Card Count	EO Exclusion - CH Commissioned Officer Corps	Purchase Category	Examples
<b>(b) (6)</b>		\$ 150,000.00	\$ 250,000.00	1		Both	<b>(b) (5)</b>
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 7,500.00	1		Both	
		\$ 3,500.00	\$ 7,500.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 5,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 25,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 25,000.00	1		Both	

AO Name	CH Name	SPL	MPL	Card Count	EO Exclusion - CH Commissioned Officer Corps	Purchase Category	Examples
(b) (6)	(b) (6)	\$ 3,500.00	\$ 10,000.00	1		Both	(b) (5)
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 7,500.00	1		Both	
		\$ 3,500.00	\$ 7,500.00	1		Both	
		\$ 3,500.00	\$ 25,000.00	1		Other essential activities	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 5,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 25,000.00	1		Both	
		\$ 10,000.00	\$ 50,000.00	1		Both	
		\$ 3,500.00	\$ 20,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 20,000.00	1		Yes	
		\$ 3,500.00	\$ 10,000.00	1			
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	

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AO Name	CH Name	SPL	MPL	Card Count	EO Exclusion - CH Commissioned Officer Corps	Purchase Category	Examples
(b) (6)	(b) (6)	\$ 3,500.00	\$ 20,000.00	1		Both	(b) (5)
(b) (6)	(b) (6)	\$ 3,500.00	\$ 15,000.00	1		Other essential activities	(b) (5)
(b) (6)	(b) (6)	\$ 3,500.00	\$ 15,000.00	1		Other essential activities	(b) (5)
(b) (6)	(b) (6)	\$ 3,500.00	\$ 15,000.00	1		Other essential activities	(b) (5)
(b) (6)	(b) (6)	\$ 3,500.00	\$ 7,500.00	1		Both	(b) (5)
(b) (6)	(b) (6)	\$ 3,000.00	\$ 7,500.00	1		Both	(b) (5)
(b) (6)	(b) (6)	\$ 3,500.00	\$ 10,000.00	1		Both	(b) (5)
(b) (6)	(b) (6)	\$ 3,500.00	\$ 7,500.00	1		Both	(b) (5)
(b) (6)	(b) (6)	\$ 3,500.00	\$ 7,500.00	1		Both	(b) (5)
(b) (6)	(b) (6)	\$ 3,500.00	\$ 10,000.00	1		Both	(b) (5)
(b) (6)	(b) (6)	\$ 3,500.00	\$ 10,000.00	1		Both	(b) (5)
(b) (6)	(b) (6)	\$ 3,500.00	\$ 7,500.00	1		Both	(b) (5)
(b) (6)	(b) (6)	\$ 3,500.00	\$ 15,000.00	1		Both	(b) (5)

NWS

AO Name	CH Name	SPL	MPL	Card Count	EO Exclusion - CH Commissioned Officer Corps	Purchase Category	Examples
(b) (6)	(b) (6)	\$ 3,500.00	\$ 10,000.00	1		Both	(b) (5)
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	
		\$ 3,500.00	\$ 5,000.00	1		Both	
		\$ 3,500.00	\$ 15,000.00	1		Both	
		\$ 3,500.00	\$ 35,000.00	1		Both	
		\$ 3,500.00	\$ 10,000.00	1		Both	

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AO Name	CH Name	SPL	MPL	Card Count	Program Office	Purchase Category	Examples
(b) (6)		\$ 3,500.00	\$ 10,000.00	1	OSPO	Life and property	(b) (5)
		\$ 10,000.00	\$ 250,000.00	1	OSPO	Life and property	
		\$ 3,500.00	\$ 10,000.00	1	OSPO	Life and property	
		\$ 3,500.00	\$ 25,000.00	1	OSPO	Life and property	
		\$ 3,500.00	\$ 25,000.00	1	OSPO	Life and property	
		\$ 25,000.00	\$ 100,000.00	1	DCAO	Both	
		\$ 10,000.00	\$ 50,000.00	1	STAR	Both	
		\$ 75,000.00	\$ 100,000.00	1	CFO	Both	
		\$ 25,000.00	\$ 75,000.00	1	OSPO	Both	
		\$ 150,000.00	\$ 1,000,000.00	1	STAR	Both	



SENIOR PROCUREMENT EXECUTIVE MEMORANDUM 2025-01

**ACTION**

**MEMORANDUM FOR:** Heads of Departmental Offices and Operating Units

**FROM:** Olivia J. Bradley  
Senior Procurement Executive and  
Director for Acquisition Management

(b) (6)

**SUBJECT:** Implementing the President’s “Department of Government Efficiency” Cost Efficiency Initiative

**Background**

On February 26, 2025, the President issued an Executive Order 14222 entitled “Implementing the President’s ‘Department of Government Efficiency’ Cost Efficiency Initiative.”<sup>1</sup> This Executive Order requires that each agency review its covered contracts and grants<sup>2</sup> within 30 days of the date of the order and issue guidance on signing new contracts or grants or modifying existing contracts or grants to promote Government efficiency and policies of the Administration. Prior to issuing the guidance, the Agency Head may approve new contracts on a case-by-case basis.

**Purpose**

The purpose of this Memorandum is to provide guidance and procedures to obtain case-by-case approval to award new covered contracts<sup>3</sup> and grants or issue modifications to exercise options for, or extensions of, covered contracts, and amendments for continuations of multi-year grant awards.

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<sup>1</sup> The EO does not apply to (a) Law enforcement officers, as defined in 5 U.S.C. 5541(3) and 5 C.F.R. 550.103, or covered contracts and grants directly related to the enforcement of Federal criminal or immigration law; (b) U.S. Customs and Border Protection and U.S. Immigration and Customs Enforcement in the Department of Homeland Security; (c) the Uniformed Services, as defined in 20 C.F.R. 404.1330; (d) any other covered grant or contract, agency component, or real property that the relevant Agency Head exempts in writing from all or part of this order, in consultation with the agency’s DOGE Team Lead and the Director of OMB; and (e) classified information or classified information systems.

<sup>2</sup> The EO defines “[c]overed contracts and grants” to mean discretionary spending through Federal contracts, grants, loans, and related instruments (including intra- and interagency agreements and agreements (IAAs) with non-Federal partners that contemplate an obligation of funding, OTA agreements, joint venture agreements, and real property transactions), but excludes direct assistance to individuals; expenditures related to immigration enforcement, law enforcement, the military, public safety, and the intelligence community; and other critical, acute, or emergency spending, as determined by the relevant Agency Head.

<sup>3</sup> For purposes of this Memorandum the term “contract” has the meaning as defined in FAR 2.101 and includes orders under indefinite delivery, indefinite quantity contracts and orders under blanket purchase agreements. In addition, for purposes of the Memorandum it includes transactions such as IAAs, OTA agreements, joint venture agreements, and real property transactions.

## Required Actions

1. All new covered contracts and grants, modifications to exercise options for, or extensions of, covered contracts, and amendments for continuations of multi-year grant awards will require review and approval, before the action can be executed. The process for obtaining approval is as follows:
  - a. **Actions Under \$100,000:**
    - i. In accordance with the Secretary's Delegation of Authority dated March 10, 2025,<sup>4</sup> Departmental offices and operating units with political leadership may approve actions under \$100,000, subject to performing the following actions:
      1. Instruct program officials on the Departmental office- or operating unit-developed procedures for obtaining approval from their senior political appointee. A sample of the information to be submitted is included in Attachment B.
      2. Instruct program officials to provide their contracting/grants/agreements officers with written certification from the senior political appointee if an action is approved.
    - ii. Departmental offices and operating units with no political leadership shall perform the following actions:
      1. Instruct program officials on the Departmental office- or operating unit-developed procedures for obtaining approval from the U.S. Department of Commerce Deputy Chief of Staff for Policy. A sample of the information to be submitted is included in Attachment B.
      2. Instruct program officials to provide their contracting/grants/agreements officers with written certification from the U.S. Department of Commerce Deputy Chief of Staff for Policy if an action is approved.
  - b. **Actions Equal to or Greater than \$100,000:**
    - i. Departmental offices and operating units with political leadership shall perform the following actions:
      1. Instruct program officials on the Departmental office- or operating unit-developed procedures for obtaining approval from the Secretary through their senior political appointee. A sample of the information to be submitted is included in Attachment B.
      2. Instruct program officials to provide their contracting/grants/agreements officers with written certification from their senior political appointee if an action is approved by the Secretary.
    - ii. Departmental offices and operating units with no political leadership shall perform the following actions:

<sup>4</sup> See Attachment A.

1. Instruct program officials on the Departmental office- or operating unit-developed procedures for obtaining approval from the Secretary. A sample of the information to be submitted is included in Attachment B.
  2. Instruct program officials to provide their contracting/grants/agreements officers with written certification if an action is approved by the Secretary.
- c. After written certification of approval of the action, contracting/grants/agreements officers may proceed with award or issuance. If a disapproval is received, the contracting/grants/agreements officers shall not proceed and shall consult with the Office of General Counsel before canceling the action to ensure consistency with certain preliminary injunction requirements that may apply.
- d. Departmental offices and operating units should continue with all planning and pre-award activities (including funds certification), finalizing performance requirements, market research, conducting negotiations, preparing modifications or amendments, and obtaining necessary approvals. Approval for these actions shall occur as soon as practicable in the process.

### **Reporting**

Departmental offices and operating units shall provide a weekly report to the Secretary and copy the Office of Acquisition Management at [OAM\\_Mailbox@doc.gov](mailto:OAM_Mailbox@doc.gov) on all actions that have been reviewed, including any actions that are specifically excluded from Executive Order 14222 (see Footnotes 1 and 2). Reports shall include the following information: Procurement Instrument Identifier (PIID)<sup>5</sup> or other unique identifier if available, modification/amendment number (if any), obligation amount, total award value, period of performance, whether the action was excluded from Executive Order 14222 (and reason for the exclusion), and whether the action was approved.

### **Effective Date**

This Memorandum is effective immediately and remains in effect until rescinded.

### **Questions**

Please direct any questions regarding this guide to [OAM Mailbox@doc.gov](mailto:OAM_Mailbox@doc.gov).

**CC:** Bureau Procurement Officials  
Assistant General Counsel for Transactions and Program Management  
Assistant General Counsel for Employment, Litigation, and Information  
Chief, Contract Law Division  
Chief, Financial Assistance Law Division  
Chief, General Law Division  
Chief, General Litigation Division

<sup>5</sup> This should be the PIID as defined by FPDS element 1A.

## DELEGATION OF AUTHORITY

In accordance with Executive Order 14222, *Implementing the President's "Department of Government Efficiency" Cost Efficiency Initiative*, dated February 26, 2025, the Department will perform a review of its contracting policies, procedures, and personnel within 30 days of the order. Following that review, the Department will issue guidance on signing new contracts or modifying existing contracts.

Prior to the issuance of that guidance, new contracts may be approved on a case-by-case basis. By the authority vested in me as Secretary of Commerce, including 5 U.S.C. § 301, *Departmental regulations*, 15 U.S.C. § 1501, *Establishment of the Department; Secretary; seal*, and Reorganization Plan No. 5 of 1950, section 2, I hereby delegate the authority to approve new contracts with a total award value less than \$100,000, consistent with Executive Order 14222, to the following Presidential-appointed, Senate confirmed (PAS) officials:

- Under Secretary of Commerce for Industry and Security (BIS)
- The Director of the U.S. Census Bureau
- The Assistant Secretary for Economic Development (EDA)
- The Under Secretary of Commerce for Economic Affairs (OUS/EA)
- The Under Secretary of Commerce for International Trade (ITA)
- The Under Secretary of Commerce for Minority Business Development (MBDA)
- The Under Secretary of Commerce for Standards and Technology (NIST)
- The Under Secretary of Commerce for Oceans and Atmosphere (NOAA)
- The Assistant Secretary for Communications and Information (NTIA)
- The Under Secretary of Commerce for Intellectual Property (USPTO)

For each respective primary operating unit where the PAS position is vacant, I delegate the authority to approve new contracts with a total award value less than \$100,000 to the senior political appointee for that primary operating unit.

For each respective primary operating unit where the PAS position is vacant and there is no senior political appointee, and for all Office of Secretary contracts, I delegate the authority to approve new contracts with a total award value less than \$100,000 to the Commerce Deputy Chief of Staff for Policy.

In order for a PAS or appointee to retain their delegated authority, they must provide me a weekly report on all contracts less than \$100,000 that they approved.

I retain authority to approve any new contract with a total award value greater than or equal to \$100,000.

This delegation is effective upon signature, and it will remain in effect unless rescinded by me.



Secretary of Commerce

Date: March 10, 2025

**Senior Procurement Executive Memorandum 2025-01: Implementing the President’s “Department of Government Efficiency” Cost Efficiency Initiative**

**Attachment B**

**Examples of Submittals**

**1. Grants Enterprise Modernization System Modification**

**Issue: Award of Critical Support contract for Grants management**

- Grants Enterprise Management System (GEMS) is a project initiated by the Department of Commerce (DOC) to revolutionize its grants systems and streamline the grant processes. Built on the foundation of the proven NIH eRA platform, GEMS ensures a robust and efficient infrastructure for managing grants. DOC is in the middle of a multiyear implementation of the NIH eRA platform.
- The GEMS PMO is staffed with one federal employee who is supported by contractor personnel. This procurement provides program management services, organizational change management services, grant management business analysts, IT consulting services, administrative support services, and grants subject matter expertise to assist the Department in retiring legacy and compartmentalized grants management systems and replace them with a modernized solution that enables the grants management missions more effectively.
- This request is to award a modification to exercise an option for a 5-month extension of program support services for \$1,055,465.79. The current awarded value of the contract is \$3,711,608.45. With this modification the total value will be \$4,767,074.24.
- Your approval to award this contract is required by Executive Order 14222 subject to the certain preliminary injunction requirements that may apply to this modification.
- **Do you approve the award of this contract modification?**

**2. HCHB Wireless Network Modernization**

**Issue: Award of Critical Modernization Equipment and services for HCHB**

- Updating the networking infrastructure is urgently required to provide reliable, resilient, and secure connectivity (wired and wireless) to the Herbert C. Hoover Building (HCHB) Enterprise Network. The first project for the HCHB Network Modernization includes

transitioning wireless access through NOAA NWave, which currently provides internet and transport services for the HCHB. Transitioning to NWave for wireless service provides 24/7/365 monitoring, alerting, and basic service desk support to all HCHB wireless customers.

- This procurement provides the purchase, configuration, installation, and maintenance of 1,526 5-G compatible wireless access points throughout the HCHB, 76 access switches, and other required networking equipment.. Purchase of this network equipment to modernize the HCHB Wireless Infrastructure is critical to the security, network operations, and business operations of the Department.
- This \$4,507,957 contract will be competitively awarded under an existing Department of Commerce multiple award contract.
- Your approval to award this contract is required by Executive Order 14222 subject to the certain preliminary injunction requirements that may apply to this award.
- **Do you approve the award of this contract?**

### **3. Network Forward**

#### **Issue: Award of Relatively Small, but Mission Essential Contract**

- Updating the networking infrastructure is urgently required to provide reliable, resilient, and secure connectivity (wired and wireless) to the Herbert C. Hoover Building (HCHB) Enterprise Network. By the end of FY2024, approximately **51%** of the network assets were end of life or obsolete.
- This purpose of this contract is purchase Forward Networks software, which a tool that will create a mathematically accurate digital representation of the network called a digital twin. The digital twin of the HCHB Network will allow the Office of Solutions and Service Delivery (OSSD) with the Chief Information Officer, in collaboration with NOAA, to properly plan and execute the network modernization efforts. Purchase of this is critical to the security, network operations, and business operations of the Department.
- This \$58,750,one year contract will be competitively awarded under an existing Department of Commerce multiple award contract.
- Your approval to award this contract is required by Executive Order 14222 subject to the certain preliminary injunction requirements that may apply to this award.
- **Do you approve the award of this contract?**

**INFORMATION - Temporary Pause in the NOAA Obligation Approval Request Process**

1 message

**AGO Policy - NOAA Service Account** <ago.policy@noaa.gov>

Thu, Mar 13, 2025 at 7:44 AM

To: \_NOAAAGO DAA Staff Offices &lt;daa.staffoffices@noaa.gov&gt;, \_AGO DISTRO TO NOAA CFOS &lt;distro.noaa.cfos@noaa.gov&gt;

Cc: Nancy Hann - NOAA Federal &lt;Nancy.Hann@noaa.gov&gt;, Laura Grimm - NOAA Federal &lt;laura.grimm@noaa.gov&gt;, \_AGO Personnel &lt;ago.personnel@noaa.gov&gt;, \_OFA AMAC &lt;amac@noaa.gov&gt;, ago frontoffice - NOAA Service Account &lt;ago.frontoffice@noaa.gov&gt;

**The following message is sent on behalf of Jeffrey Thomas, AGO Director**

In light of the attached guidance issued by the Department of Commerce on March 11, 2025, we are temporarily suspending the submission of new obligation requests, including requests to obligate BIL/IRA funds. This pause is necessary to assess whether any process changes are needed and to determine if any further action is needed for requests already submitted.

We will provide updated guidance by the end of the week. We thank you in advance for your patience.

Email questions to [AGO.Policy@noaa.gov](mailto:AGO.Policy@noaa.gov).

----- Forwarded message -----

**The following message is sent on behalf of Jeffrey Thomas, AGO Director**

**MEMORANDUM FOR:** Deputy Assistant Administrators  
Staff Office Directors  
Chief Financial Officers

**CC:** Deputy Under Secretary of Operations  
Chief of Staff  
Acquisition and Grants Office Personnel  
Acquisition Management Advisory Committee

**FROM:** Jeffrey S. Thomas  
Director, Acquisition and Grants Office

**SUBJECT:** NOAA Obligation Approval Request Process

Effective immediately, the Department of Commerce (DOC) is pausing all purchases using Federal funds, including Government purchase card transactions and contract action awards<sup>[1]</sup>. The purpose of this memorandum is to provide NOAA's process for complying with DOC guidance for implementing [Executive Order 14222, Implementing the President's "Department of Government Efficiency" Cost Efficiency Initiative](#), and for requesting approval to use Federal funds.

This approval process is intended for purchases that are necessary to sustain our mission including the preservation of life, property, and safety. Before making any purchase or awarding any contract action, the requirements office must submit the transaction for NOAA Leadership approval. Requesters will use the [NOAA Obligation Approval Request Form](#) to request necessary reviews and final approval. Once completed, the form will automatically route to the requester's Line Office Deputy Assistant Administrator or Staff Office Director for review and concurrence. With their concurrence, the action will proceed to the front office for adjudication.

In accordance with the Department of Commerce's interim approval, the purchase cardholders listed in Attachment 2 will retain their current card limits and the ability to execute actions consistent with the justifications provided.

This process does not apply to purchases using any amount of Bipartisan Infrastructure Law and Inflation Reduction Act (BIL/IRA) funds. When BIL/IRA funds will be used, requirements offices will follow the NOAA and Department of Commerce (DOC) Leadership approval process, issued on February 21, 2025.

Attachments:

1. NOAA Obligation Approval Request Form Instructions
2. NOAA Approved Purchase Card Holder Listing

1 Contract means a mutually binding legal relationship obligating the seller to furnish the supplies or services (including construction) and the buyer to pay for them. It includes all types of commitments that obligate the Government to an expenditure of appropriated funds and that, except as otherwise authorized, are in writing. In addition to bilateral instruments, contracts include (but are not limited to) awards and notices of awards; job orders or task letters issued under basic ordering agreements; letter contracts; orders, such as purchase orders, under which the contract becomes effective by written acceptance or performance; and bilateral contract modifications. Contracts do not include grants and cooperative agreements covered by 31 U.S.C.6301, et seq.

## 2 attachments

 **SPE Memo 2025-01\_DOGE\_signed.pdf**  
453K

 **Attachment B.docx**  
27K



SENIOR PROCUREMENT EXECUTIVE MEMORANDUM 2025-01 (REVISED)

ACTION

MEMORANDUM FOR: Heads of Departmental Offices and Operating Units

FROM: Olivia J. Bradley  
Senior Procurement Executive and  
Director for Acquisition Management

(b) (6)

SUBJECT: Implementing the President's "Department of Government Efficiency" Cost Efficiency Initiative

Background

On February 26, 2025, the President issued Executive Order 14222, entitled "Implementing the President's 'Department of Government Efficiency' Cost Efficiency Initiative." This Executive Order requires that each agency review its covered contracts and grants<sup>1</sup> and its contracting policies, procedures, and personnel within 30 days of the date of the Order and issue guidance on signing new contracts or grants or modifying existing contracts or grants to promote Government efficiency and policies of the Administration<sup>2</sup>. Prior to issuing the guidance, the Secretary of Commerce may approve new contracts or grants on a case-by-case basis.

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<sup>1</sup> The EO defines "[c]overed contracts and grants" to mean "discretionary spending through Federal contracts, grants, loans, and related instruments," but excludes "direct assistance to individuals; expenditures related to immigration enforcement, law enforcement, the military, public safety, and the intelligence community; and other critical, acute, or emergency spending, as determined by the relevant Agency Head. "

For purposes of this guidance:

- "Discretionary spending" means any spending not within the scope of the specifically enumerated exclusions noted above, and is irrespective of the form of budget authority to be obligated or the statutory authority under which it was made available.
- "Contracts" has the meaning as defined in FAR 2.101 and includes blanket purchase agreements, orders under blanket purchase agreements, and orders under indefinite delivery, indefinite quantity contracts.
- "Related instruments" includes (1) intra-Departmental and interagency agreements (IAAs) regardless of form or format that would obligate Departmental office or operating unit funds; (2) Other Transaction Authority (OTA) agreements; (3) joint venture agreements; (4) real property transactions; and (5) any other form of non-procurement, non-financial assistance, or non-litigation settlement agreement that would obligate Departmental office or operating unit funds. However, it excludes intra-Departmental agreements to pay for Federal personnel/employee work/support to Departmental offices and operating units.

<sup>2</sup> The EO does not apply to (a) Law enforcement officers, as defined in 5 U.S.C. 5541(3) and 5 C.F.R. 550.103, or covered contracts and grants directly related to the enforcement of Federal criminal or immigration law; (b) U.S.

## Purpose

The purpose of this Memorandum is to provide guidance and procedures to obtain case-by-case approval to award new covered contracts and grants or issue modifications to exercise options for, or extensions of, covered contracts, and amendments for continuations of multi-year covered grant awards.

## Required Actions

1. All new covered contracts and grants, modifications to exercise options for, or extensions of, covered contracts, and amendments for continuations of multi-year covered grant awards will require review and approval, before the action can be executed. The process for obtaining approval is as follows:
  - a. **Actions Under \$100,000<sup>3</sup>:**
    - i. In accordance with the Secretary's Delegation of Authority dated March 10, 2025,<sup>4</sup> Departmental offices and operating units with political leadership may approve actions under \$100,000, subject to performing the following actions:
      1. Instruct program officials on the Departmental office- or operating unit-developed procedures for obtaining approval from their senior political appointee. A sample of the information to be submitted is included in Attachment B.
      2. Instruct program officials to provide their contracting/grants/agreements officers with written certification from the senior political appointee if an action is approved.
    - ii. Departmental offices and operating units with no political leadership shall perform the following actions:
      1. Instruct program officials on the Departmental office- or operating unit-developed procedures for obtaining approval from the U.S. Department of Commerce Deputy Chief of Staff for Policy. A sample of the information to be submitted is included in Attachment B.
      2. Instruct program officials to provide their contracting/grants/agreements officers with written certification from the U.S. Department of Commerce Deputy Chief of Staff for Policy if an action is approved.

Customs and Border Protection and U.S. Immigration and Customs Enforcement in the Department of Homeland Security; (c) the Uniformed Services, as defined in 20 C.F.R. 404.1330; (d) any other covered grant or contract, agency component, or real property that the relevant Agency Head exempts in writing from all or part of this order, in consultation with the agency's DOGE Team Lead and the Director of OMB; and (e) classified information or classified information systems. EO 14222 § 4.

<sup>3</sup> Values indicated within this memorandum are for the total covered contract and grant value inclusive of options or continuations contemplated at award.

<sup>4</sup> See Attachment A.

- b. **Actions Equal to or Greater than \$100,000:**
  - i. Departmental offices and operating units with political leadership shall perform the following actions:
    - 1. Instruct program officials on the Departmental office- or operating unit-developed procedures for obtaining approval from the Secretary through their senior political appointee. A sample of the information to be submitted is included in Attachment B.
    - 2. Instruct program officials to provide their contracting or grants/agreements officers with written certification from their senior political appointee if an action is approved by the Secretary.
  - ii. Departmental offices and operating units with no political leadership shall perform the following actions:
    - 1. Instruct program officials on the Departmental office- or operating unit-developed procedures for obtaining approval from the Secretary. A sample of the information to be submitted is included in Attachment B.
    - 2. Instruct program officials to provide their contracting/grants/agreements officers with written certification if an action is approved by the Secretary.
- c. After written certification of approval of the action, contracting/grants/agreements officers may proceed with award or issuance. If a disapproval is received, the contracting/grants/agreements officers shall not proceed and shall consult with the Office of the General Counsel before canceling the action to ensure consistency with any applicable court orders.
- d. Departmental offices and operating units should continue with all planning and pre-award activities (including funds certification), finalizing performance requirements, market research, conducting negotiations, preparing modifications or amendments, and obtaining necessary approvals. Approval for these actions shall occur as soon as practicable in the process.

### **Reporting**

Departmental offices and operating units shall provide a weekly report to the Secretary and copy the Office of Acquisition Management at OAM\_Mailbox@doc.gov on all actions that have been reviewed, including any actions that are specifically excluded from Executive Order 14222 (see footnotes 1 and 2 above). Reports shall include the following information: Procurement Instrument Identifier (PIID)<sup>5</sup> or other unique identifier if available, modification/amendment number (if any), obligation amount, total award value, period of performance, whether the action was excluded from Executive Order 14222 (and reason for the exclusion), and whether the action was approved.

### **Effective Date**

<sup>5</sup> This should be the PIID as defined by FPDS element 1A.

This Memorandum is effective immediately and remains in effect until rescinded.

**Questions**

Please direct any questions regarding this guide to [OAM Mailbox@doc.gov](mailto:OAM_Mailbox@doc.gov).

**CC:** Bureau Procurement Officials  
Assistant General Counsel for Transactions and Program Management  
Assistant General Counsel for Employment, Litigation, and Information  
Chief, Contract Law Division  
Chief, Financial Assistance Law Division  
Chief, General Law Division  
Chief, General Litigation Division

## DELEGATION OF AUTHORITY

In accordance with Executive Order 14222, *Implementing the President's "Department of Government Efficiency" Cost Efficiency Initiative*, dated February 26, 2025, the Department will perform a review of its contracting policies, procedures, and personnel within 30 days of the order. Following that review, the Department will issue guidance on signing new contracts or modifying existing contracts.

Prior to the issuance of that guidance, new contracts may be approved on a case-by-case basis. By the authority vested in me as Secretary of Commerce, including 5 U.S.C. § 301, *Departmental regulations*, 15 U.S.C. § 1501, *Establishment of the Department; Secretary; seal*, and Reorganization Plan No. 5 of 1950, section 2, I hereby delegate the authority to approve new contracts with a total award value less than \$100,000, consistent with Executive Order 14222, to the following Presidential-appointed, Senate confirmed (PAS) officials:

- Under Secretary of Commerce for Industry and Security (BIS)
- The Director of the U.S. Census Bureau
- The Assistant Secretary for Economic Development (EDA)
- The Under Secretary of Commerce for Economic Affairs (OUS/EA)
- The Under Secretary of Commerce for International Trade (ITA)
- The Under Secretary of Commerce for Minority Business Development (MBDA)
- The Under Secretary of Commerce for Standards and Technology (NIST)
- The Under Secretary of Commerce for Oceans and Atmosphere (NOAA)
- The Assistant Secretary for Communications and Information (NTIA)
- The Under Secretary of Commerce for Intellectual Property (USPTO)

For each respective primary operating unit where the PAS position is vacant, I delegate the authority to approve new contracts with a total award value less than \$100,000 to the senior political appointee for that primary operating unit.

For each respective primary operating unit where the PAS position is vacant and there is no senior political appointee, and for all Office of Secretary contracts, I delegate the authority to approve new contracts with a total award value less than \$100,000 to the Commerce Deputy Chief of Staff for Policy.

In order for a PAS or appointee to retain their delegated authority, they must provide me a weekly report on all contracts less than \$100,000 that they approved.

I retain authority to approve any new contract with a total award value greater than or equal to \$100,000.

This delegation is effective upon signature, and it will remain in effect unless rescinded by me.

A black rectangular redaction box covers the signature area. Overlaid on the box are two large red characters: "(b)" on the left and "(6)" on the right, indicating a FOIA exemption.

Secretary of Commerce

Date: March 10, 2025

# Senior Procurement Executive Memorandum 2025-01: Implementing the President's "Department of Government Efficiency" Cost Efficiency Initiative

## Attachment B

### Examples of Submittals

#### 1. Grants Enterprise Modernization System Modification

##### Issue: Award of Critical Support contract for Grants management

- Grants Enterprise Management System (GEMS) is a project initiated by the Department of Commerce (DOC) to revolutionize its grants systems and streamline the grant processes. Built on the foundation of the proven NIH eRA platform, GEMS ensures a robust and efficient infrastructure for managing grants. DOC is in the middle of a multiyear implementation of the NIH eRA platform.
- The GEMS PMO is staffed with one federal employee who is supported by contractor personnel. This procurement provides program management services, organizational change management services, grant management business analysts, IT consulting services, administrative support services, and grants subject matter expertise to assist the Department in retiring legacy and compartmentalized grants management systems and replace them with a modernized solution that enables the grants management missions more effectively.
- This request is to award a modification to exercise an option for a 5-month extension of program support services for \$1,055,465.79. The current awarded value of the contract is \$3,711,608.45. With this modification the total value will be \$4,767,074.24.
- Your approval to award this contract is required by Executive Order 14222 subject to the certain preliminary injunction requirements that may apply to this modification.
- **Do you approve the award of this contract modification?**

#### 2. HCHB Wireless Network Modernization

##### Issue: Award of Critical Modernization Equipment and services for HCHB

- Updating the networking infrastructure is urgently required to provide reliable, resilient, and secure connectivity (wired and wireless) to the Herbert C. Hoover Building (HCHB) Enterprise Network. The first project for the HCHB Network Modernization includes

transitioning wireless access through NOAA NWave, which currently provides internet and transport services for the HCHB. Transitioning to NWave for wireless service provides 24/7/365 monitoring, alerting, and basic service desk support to all HCHB wireless customers.

- This procurement provides the purchase, configuration, installation, and maintenance of 1,526 5-G compatible wireless access points throughout the HCHB, 76 access switches, and other required networking equipment.. Purchase of this network equipment to modernize the HCHB Wireless Infrastructure is critical to the security, network operations, and business operations of the Department.
- This \$4,507,957 contract will be competitively awarded under an existing Department of Commerce multiple award contract.
- Your approval to award this contract is required by Executive Order 14222 subject to the certain preliminary injunction requirements that may apply to this award.
- **Do you approve the award of this contract?**

### **3. Network Forward**

#### **Issue: Award of Relatively Small, but Mission Essential Contract**

- Updating the networking infrastructure is urgently required to provide reliable, resilient, and secure connectivity (wired and wireless) to the Herbert C. Hoover Building (HCHB) Enterprise Network. By the end of FY2024, approximately **51%** of the network assets were end of life or obsolete.
- This purpose of this contract is purchase Forward Networks software, which a tool that will create a mathematically accurate digital representation of the network called a digital twin. The digital twin of the HCHB Network will allow the Office of Solutions and Service Delivery (OSSD) with the Chief Information Officer, in collaboration with NOAA, to properly plan and execute the network modernization efforts. Purchase of this is critical to the security, network operations, and business operations of the Department.
- This \$58,750,one year contract will be competitively awarded under an existing Department of Commerce multiple award contract.
- Your approval to award this contract is required by Executive Order 14222 subject to the certain preliminary injunction requirements that may apply to this award.
- **Do you approve the award of this contract?**

## Frequently Asked Questions

### Senior Procurement Executive (SPE) Memorandum 2025-01 (REVISED)<sup>1</sup>

**1. Do purchases using the Government Purchase Card (GPC) require approval in accordance with SPE Memorandum 2025-01?**

No, approvals for purchase card transactions are not covered by SPE Memorandum 2025-01. GPC cardholders shall follow Departmental guidance on approved use and reporting requirements associated with such cards. Reporting on these actions in accordance with SPE Memorandum 2025-01 is not required.

**2. Who is the Agency Head for the purposes of the Executive Order 14222?**

For purposes of the Executive Order the Agency Head is the Secretary of Commerce.

**3. Are there exceptions or exclusions to the approval requirements outlined in SPE Memorandum 2025-01?**

The Executive Order does not apply to (a) Law enforcement officers, as defined in 5 U.S.C. 5541(3) and 5 C.F.R. 550.103, or covered contracts and grants directly related to the enforcement of Federal criminal or immigration law; (b) U.S. Customs and Border Protection and U.S. Immigration and Customs Enforcement in the Department of Homeland Security; (c) the Uniformed Services, as defined in 20 C.F.R. 404.1330; (d) any other covered grant or contract, agency component, or real property that the relevant Agency Head exempts in writing from all or part of this order, in consultation with the agency's DOGE Team Lead and the Director of OMB; and (e) classified information or classified information systems. EO 14222 § 4.

The definition of "covered contracts and grants" excludes "direct assistance to individuals; expenditures related to immigration enforcement, law enforcement, the military, public safety, and the intelligence community; and other critical, acute, or emergency spending, as determined by the relevant Agency Head."

Also note that Footnote 1 in the SPE Memorandum 2025-01 (REVISED) contains definitions of discretionary spending, contracts, and related instruments (including agreements).

<sup>1</sup> All references to SPE Memorandum 2025-01 will be to the REVISED memorandum, issued on March 14, 2025.

**4. How do I know if one of these exceptions or exclusions applies to my requirement?**

Requirements officials must consult with their Departmental office's or operating unit's senior political appointee as identified in SPE Memorandum 2025-01 to aid in making that determination. All exceptions or exclusions must be reported on a weekly basis to the Secretary per the reporting requirements outlined in the SPE Memorandum.

**5. Are actions using funds other than annual appropriations considered "discretionary"?**

See Footnote 1 of the SPE Memorandum 2025-01 for discussion of the definition of "discretionary" for the purposes of the required approval.

**6. Is approval required to award a contract using funds received from another agency (incidental contracting or interagency acquisition where the Department is the servicing agency)?**

Yes. While an interagency agreement with an agency outside the Department or other agreement with a non-Federal partner where the Department is receiving funds is not a "covered contract," and therefore does not need to be approved under SPE Memorandum 2025-01, any procurement contract awarded by a Departmental office or operating unit in relation to *performance* under such an agreement would be a covered contract that must be approved consistent with the procedures laid out in the guidance.

Intra-Departmental agreements (i.e., agreements between Departmental offices and/or operating units) are subject to the approval procedures in SPE Memorandum 2025-01 if they contemplate that the servicing Departmental office or operating unit will incur obligations other than for Federal employees (in other words, funds will be obligated for disbursement to a non-Federal party, whether through a contract, grant, other transaction agreement, joint venture agreement, etc.). The proposed intra-Departmental agreement and related transaction with a non-Federal party should be reviewed under the SPE Memorandum 2025-01 process concurrently.

**7. Can we issue a letter contract, verbal notice to proceed, or similar instrument before getting approval?**

No. Extensions of current contracts, grants, or agreements are not permitted to provide for additional time to obtain approval.

Please note that while letter contracts or similar instruments are not permitted without approval, if an approval is pending there is a contract remedy that may be considered. Federal Acquisition Regulation (FAR) 49.102(d) allows for reinstatement of terminated

contracts if the contractor consents to the reinstatement, circumstances clearly indicate a requirement exists for the terminated items, and reinstatement is advantageous to the Government. To use this in cases where an approval has been submitted but not received and there is uncertainty as to the continued need for the requirement, a contract would need to be terminated prior to the end of the current period of performance, with it becoming effective as late as possible to avoid any termination costs. The contract may then be reinstated in accordance with the requirements of FAR 49.102(d) if approval is obtained. *No guarantee or promise of future work may be given to the contractor in conjunction with the termination for convenience and all normal procedures associated with a termination should occur (e.g. return of equipment, etc.).* Legal review of terminations shall be conducted in accordance with Commerce Acquisition Manual 1301.71.

**8. Can we exercise an option at no cost to keep a contract open while we await approval?**

No. Extensions of current contracts, grants, or agreements, including exercising a no cost option, are not permitted to provide for additional time to obtain approval.

**9. What happens if we don't get approval before a contract expires?**

If approval is received after a contract expires, necessary goods and services will need to be purchased under a new contractual instrument.

**10. Do we need approval to deobligate funds or issue administrative modifications?**

No, this process is not required for modifications that deobligate funds or make administrative changes, as defined at FAR 43.101.

**11. Do we need this approval to add incremental funding to an existing contract or line item?**

No, this process is not required for modifications to add incremental funding providing that adding incremental funding is not used as a mechanism to circumvent the approval requirements required by this SPE Memorandum or other applicable guidance.

**12. Does the total value apply to the value of the option to be exercised or the total value of the contract when issuing a modification to exercise an option?**

The thresholds for approval apply to the total contract value inclusive of options even in the case of a modification to exercise an option. For example, if a contract has a total value of \$400,000 and each of the base and four option years is valued at \$80,000, the modification action must receive approval by the Secretary.

**13. Can the awarding official issue a solicitation in advance of obligation approval?**

The SPE Memorandum 2025-01 does not prohibit the issuance of solicitations. Although it is not prohibited, it is recommended that approval is obtained as soon as practicable to ensure that vendors are not submitting proposals in response to solicitations that will not end up being awarded. Early coordination with leadership is also important in order to ensure that they are aware of and support actions being publicized.

**14. Attachment A of SPE Memo 2025-01 outlines a delegation from the Secretary for new contracts. Does this delegation also cover modifications for the exercise of options or extensions?**

Yes, modifications for the exercise of options or extensions, where the total award value is less than \$100,000, may be approved by the officials indicated in the delegation.

**15. Section 1c of SPE Memo 2025-01 requires consultation with the Office of General Counsel. Is this bureau-level OGC or the Financial Assistance Law Division (FALD)?**

For the purposes of the memo the consultation should be with FALD.

**16. What is considered the total value for a Blanket Purchase Agreement?**

For purposes of a BPA, the total value is the total estimated ceiling of the agreement inclusive of any optional periods.

## Frequently Asked Questions Version 2.0

### Senior Procurement Executive (SPE) Memorandum 2025-01 (REVISED)<sup>1</sup>

**1. Do purchases using the Government Purchase Card (GPC) require approval in accordance with SPE Memorandum 2025-01?**

No, approvals for purchase card transactions are not covered by SPE Memorandum 2025-01. GPC cardholders shall follow Departmental guidance on approved use and reporting requirements associated with such cards. Reporting on these actions in accordance with SPE Memorandum 2025-01 is not required.

**2. Who is the Agency Head for the purposes of the Executive Order 14222?**

For purposes of the Executive Order the Agency Head is the Secretary of Commerce.

**3. Are there exceptions or exclusions to the approval requirements outlined in SPE Memorandum 2025-01?**

The Executive Order does not apply to (a) Law enforcement officers, as defined in 5 U.S.C. 5541(3) and 5 C.F.R. 550.103, or covered contracts and grants directly related to the enforcement of Federal criminal or immigration law; (b) U.S. Customs and Border Protection and U.S. Immigration and Customs Enforcement in the Department of Homeland Security; (c) the Uniformed Services, as defined in 20 C.F.R. 404.1330; (d) any other covered grant or contract, agency component, or real property that the relevant Agency Head exempts in writing from all or part of this order, in consultation with the agency's DOGE Team Lead and the Director of OMB; and (e) classified information or classified information systems. EO 14222 § 4.

The definition of "covered contracts and grants" excludes "direct assistance to individuals; expenditures related to immigration enforcement, law enforcement, the military, public safety, and the intelligence community; and other critical, acute, or emergency spending, as determined by the relevant Agency Head."

Also note that Footnote 1 in the SPE Memorandum 2025-01 (REVISED) contains definitions of discretionary spending, contracts, and related instruments (including agreements).

<sup>1</sup> All references to SPE Memorandum 2025-01 will be to the REVISED memorandum, issued on March 14, 2025.

**4. How do I know if one of these exceptions or exclusions applies to my requirement?**

Requirements officials must consult with their Departmental office's or operating unit's senior political appointee as identified in SPE Memorandum 2025-01 to aid in making that determination. All exceptions or exclusions must be reported on a weekly basis to the Secretary per the reporting requirements outlined in the SPE Memorandum.

**5. Are actions using funds other than annual appropriations considered "discretionary"?**

See Footnote 1 of the SPE Memorandum 2025-01 for discussion of the definition of "discretionary" for the purposes of the required approval.

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contracts if the contractor consents to the reinstatement, circumstances clearly indicate a requirement exists for the terminated items, and reinstatement is advantageous to the Government. To use this in cases where an approval has been submitted but not received and there is uncertainty as to the continued need for the requirement, a contract would need to be terminated prior to the end of the current period of performance, with it becoming effective as late as possible to avoid any termination costs. The contract may then be reinstated in accordance with the requirements of FAR 49.102(d) if approval is obtained. *No guarantee or promise of future work may be given to the contractor in conjunction with the termination for convenience and all normal procedures associated with a termination should occur (e.g. return of equipment, etc.).* Legal review of terminations shall be conducted in accordance with Commerce Acquisition Manual 1301.71.

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**14. Attachment A of SPE Memo 2025-01 outlines a delegation from the Secretary for new contracts. Does this delegation also cover modifications for the exercise of options or extensions?**

Yes, modifications for the exercise of options or extensions, where the total award value is less than \$100,000, may be approved by the officials indicated in the delegation.

**15. Section 1c of SPE Memo 2025-01 requires consultation with the Office of General Counsel. Is this bureau-level OGC or the Financial Assistance Law Division (FALD)?**

For the purposes of the memo the consultation should be with FALD for financial assistance or the Contract Law Division (CLD) for contracts who will then coordinate internally with the General Litigation Division.

**16. What is considered the total value for a Blanket Purchase Agreement?**

For purposes of a BPA, the total value is the total estimated ceiling of the agreement inclusive of any optional periods.

**17. May FAR 52.217-9, *Option to Extend the Term of the Contract*, be tailored to address situations in which an approval has not been approved?**

Yes, FAR 52.217-9 may be tailored and changes may be negotiated with a contractor. A sample tailored clause is included below. The subsequent negotiation to exercise the option may include start up costs associated with restarting the work but may not include any costs associated with the period for which the contract was stopped after the expiration of the previous period.

**FAR 52.217-9 Option to Extend the Term of the Contract (Mar 2000)**

(a) The Government may extend the term of this contract by written notice to the Contractor within \_\_\_\_\_ [*insert the period of time within which the Contracting Officer may exercise the option*]; provided that the Government gives the Contractor a preliminary written notice of its intent to extend at least \_\_\_\_\_ days [*60days unless a different number of days is inserted*] before the contract expires. The preliminary notice

"PREDECISIONAL"

does not commit the Government to an extension. If the Government fails to extend the term of the contract within the period identified and the Government has provided a written notice to the Contractor that the action is undergoing review in accordance with Department of Commerce procedures for implementing Executive Order 14222 the contractor shall stop all work and incur no costs to be charged to the Government. Once the Department of Commerce's review process has occurred, or no later than 30 days from the initial review notification, the Government will notify the contractor if the option may be exercised and, if so, adjust start and end dates of the period of performance accordingly. The Government will then extend the term of the contract with a bilateral modification.

(b) If the Government exercises this option, the extended contract shall be considered to include this option clause.

(c) The total duration of this contract, including the exercise of any options under this clause, shall not exceed \_\_\_\_\_ (*months*) (*years*).

(End of clause)

**INFORMATION - Revised NOAA Obligation Approval Request Process**

1 message

on behalf of Jeffrey S. Thomas - NOAA Federal &lt;jeffrey.s.thomas@noaa.gov&gt;

Tue, Mar 25, 2025 at 12:51 PM

To: \_NOAAAGO DAA Staff Offices &lt;daa.staffoffices@noaa.gov&gt;, \_AGO DISTRO TO NOAA CFOS &lt;distro.noaa.cfos@noaa.gov&gt;, \_AGO Distro to NOAA Chiefs of staff &lt;distro\_noaa\_cos@noaa.gov&gt;

Cc: \_NOAA Policy &lt;noaa.policy@noaa.gov&gt;, Nancy Hann - NOAA Federal &lt;Nancy.Hann@noaa.gov&gt;, Binita Sharma - NOAA Federal &lt;binita.sharma@noaa.gov&gt;, Laura Grimm - NOAA Federal &lt;laura.grimm@noaa.gov&gt;, \_AGO Personnel &lt;ago.personnel@noaa.gov&gt;, \_OFAAMAC &lt;amac@noaa.gov&gt;

**The following message is sent on behalf of Jeffrey Thomas, AGO Director****NOAA** NATIONAL OCEANIC AND  
ATMOSPHERIC ADMINISTRATION  
UNITED STATES DEPARTMENT OF COMMERCE

**MEMORANDUM FOR:** Deputy Assistant Administrators  
Staff Office Directors  
Chief Financial Officers  
Chiefs of Staff

**CC:** Acquisition and Grants Office Personnel  
Acquisition Management Advisory Council  
Deputy Undersecretary for Operations  
NOAA Chief of Staff  
NOAA DUSO Policy Team

**FROM:** Jeffrey S. Thomas, Director  
Acquisition and Grants Office

**SUBJECT:** INFORMATION - Revised NOAA Obligation  
Approval Request Process

**DATE:** March 25, 2025

As a result of changes to Departmental and NOAA Leadership guidance, the original Obligation Approval Process was paused. In the interim, the DUSO staff maintained a list of DUSO Expiring Contracts that required immediate attention. This list also recorded the adjudication of certain urgent actions. Effective 3/25, the DUSO list has been deactivated and will no longer accept actions for adjudication.

Effective 3/25, the revised NOAA [Obligation Approval Request Form](#) is active and is the sole point of entry for covered actions seeking obligation approval in accordance with [SPE Memo 2025](#) (revised). The [SPE Memo Frequently Asked Questions V2](#) provides useful information regarding requirements and coverage. The revised approval process is similar to the original form, but includes a number of important changes. These changes include:

1. BIL/IRA - Effective immediately, the separate BIL/IRA funding approval process, introduced on February 21, 2025, is rescinded. Program offices will use the updated Obligation Approval Request process for all covered actions, including those using BIL or IRA funds at any dollar value. Please discontinue use of the separate BIL/IRA request form.
2. Update Certain Data Previously Submitted - Program offices must use the new form to reenter all previous requests that have not been definitively approved or disapproved. Unfortunately, the new Obligation Approval Request contains new/different data fields that will require reentry. This includes:
  - a. Previously Submitted [BIL/IRA Entries](#)
    - i. Resubmit all requests that have not been approved/disapproved
  - b. Previously Submitted [Obligation Request Entries](#)
    - i. Resubmit all requests that have not been approved/disapproved
  - c. DUSO Expiring Contracts [Spreadsheet](#)

i. Use the Obligation Approval Request form to resubmit actions that do not have YES in column K.

3. **Prioritize** - Program offices must first prioritize expiring contracts by requesting approval for contracts that expire between now and June 30, 2025 before submitting other actions for approval.

4. **Additional Summary Documentation** - For actions exceeding \$100K, requesters must upload a stand-alone document that provides details of the request. Samples of the Additional Summary Documentation are provided in [Attachment B](#) of [SPE Memo 2025-01](#) (revised 3/14/25). It is important to closely follow the model format provided.

5. **Inclusion of Interagency Agreements** - The obligation approval process includes interagency agreements, whether NOAA is the requesting or servicing agency.

6. **Financial Assistance Agreements** - AGO will be issuing a process for grant obligations and other related instruments (except interagency agreements) in the near future. Unless otherwise noted, the pause in obligations for Financial Assistance Agreements remains in effect. If there is an emergency related to a Financial Assistance Agreement, please contact your grants officer in GMD.

Detailed instructions are provided in the NOAA Obligation Approval Request form (Revised 2025-03-24). Review the [SPE Memo Frequently Asked Questions V2](#) and the [NOAA Obligation Approval Process FAQs](#) for more information. Email questions about this process to the NOAA DUSO Policy Team at [NOAA.Policy@noaa.gov](mailto:NOAA.Policy@noaa.gov).

# NOAA Contract Obligation Approval Request Form (Revised 2025-03-24)

The Requirements Office must complete this form to request approval to obligate funds, including BIL and IRA, on any new covered contract or modification that exercises an option or extends a covered contract, interagency agreement, or Government Purchase Card (GPC) when using BIL or IRA funds; as required by [SPE Memo 2025-01](#) and [E.O. 14222](#), Implementing the President's "Department of Government Efficiency" Cost Efficiency Initiative.

## Do not use this form for any of the following:

1. GPC purchases using **NON BIL/IRA funds** that are made by cardholders identified on the NOAA Approved Purchase Card Holder Listing that are consistent with the justifications provided to the Department of Commerce (DOC).
2. Grants or Financial Assistance (Use the Grants Approval Form).
3. All other Related Instruments except for interagency agreements. (Use the Other Related Instruments Form).

Before submitting this form, requesters should follow any internal review procedures established within their organization. Requestors must conduct an in-depth review of the requirement and ensure that none of the requirement's conflict with the Administration's priorities and guidelines.

Quick Links to: [New OR Submissions](#), [NOAA FAQs](#) and [SPE Memo FAQs](#)  
[Link to full form to see questions in advance](#)

Need to cancel a request or make changes? *Note: Changes will require a new submission.*  
Email: [sda.ago@noaa.gov](mailto:sda.ago@noaa.gov)  
Subject: OR-25-00123, Obligation Request Change/Cancel

## Actions that require Agency Head Determination

POC submit internal LO Approval Request form --> Deputy Assistant Administrator/Staff Office Director or Line/Staff Office Senior Leadership concurs --> Requests are forwarded immediately and marked accordingly to NOAA Senior Political Leadership --> DOC Secretary Approval.

## Actions below \$100,000

POC submit internal LO Approval Request form --> Deputy Assistant Administrator/Staff Office Director or Line/Staff Office Senior Leadership concurs --> Each day, requests are forwarded to NOAA Senior Political Leadership--> NOAA Senior Leadership for Approval.

## Actions equal to or above \$100,000

POC submit internal LO Approval Request form --> Deputy Assistant Administrator/Staff Office Director or Line/Staff Office Senior Leadership concurs --> Each day, requests are

forwarded to NOAA Senior Political Leadership (FOR CONSIDERATION) ----> DOC Secretary for Approval.

**Written Certification of Approval**

Line offices should monitor the [NOAA OR PL Approval](#) sheet regularly to check on requests for approvals.

**Disapproval**

If a request is disapproved, the contracting officer must not proceed and must consult with the Office of General Counsel before canceling the action to ensure consistency with certain preliminary injunction requirements that may apply.

\* Indicates required question

1. Email \*

2. Line Office \*

If your office is not represented below, please submit your office and approvers [here](#)

 Dropdown

*Mark only one oval.*

- Education
- OIA
- OLIA
- Communications
- AGO
- CAO
- CFO
- CIO
- OHCS
- OICR
- NMFS
- NOS
- NESDIS
- OAR
- NWS
- OMAO
- OSC

3. BLUF \*

*Bottom Line Up Front (BLUF)- 1-2 sentences - what the action does, any important info to know.*

*Example: Under this contract the cafeteria hood will be inspected and cleaned monthly. This is required as part of the D.C. Health Inspection and license to operate.*



4. Expiration or need by date \*

*For existing actions use current expiration date, for new actions (ie. new awards, mods to increase scope) provide a NLT (No Later Than) award date.*

*Example: January 7, 2019*

5. Amount of Obligation \*

*Example format: \$80,000.00*

6. Greater than \$100,000? \*

*The thresholds for approval apply to the total contract value inclusive of options even in*

*the case of a modification to exercise an option. For example, if a contract has  Dropdown a total*

*value of \$400,000.00 and each of the base and four option years is valued at \$80,000.00 the modification action must receive approval by the Secretary.*

*Example format: \$400,000.00*

*Mark only one oval.*

Yes

No

## 7. Details to the BLUF

*This question is an extension of the BLUF to provide only additional critical details on what the action does, why it's important, what is at risk if canceled. Be sure to include if labor involved.*

**Example:** *The purpose of this contract is to provide Canine Explosive Detection services at the National Institute of Standards and Technology campuses in Gaithersburg, Maryland and Boulder, Colorado. These services are essential to government Physical Security activities that are NATIONAL SECURITY/NATIONAL SECURITY ADJACENT as defined in 5 CFR 732.102.*

8. Does this action obligation include funding from BIL/IRA? \*

 Dropdown

*Mark only one oval.*

 Yes No

9. Point of Contact (who can answer questions regarding additional information) \*

*Name only\* Phone and email on next questions*

10. Point of Contact (who can answer questions regarding additional information) \*

*Phone Only\* Email on next question*

11. Point of Contact (who can answer questions regarding additional information) \*

*Email Only\**

## Acquisition Stage

12. What phase of the acquisition process is this action in? \*

Dropdown

*Mark only one oval.*

Pre Award *Skip to question 13*

Award/Modification to Existing *Skip to question 18*

## Pre Award Information

13. Action Type for Obligation (Anticipated) \*

Dropdown

*Mark only one oval.*

New Contract - including new Ordering Vehicles (IDIQ, BPA, BOA, etc.)

New Task/Delivery Order

Purchase Order

Interagency Agreement

Purchase Card Transaction using BIL or IRA Funds

14. Anticipated Procurement Instrument Identifier (PIID) number such as, Solicitation \*  
or Requisition Number (Include all that are applicable)

**Example:** 1305M225D1234/1305M2F251234, 140802-25-1234

15. Estimated Total Value (Base and All Options Value) \*

*The thresholds for approval apply to the total contract value inclusive of options even in the case of a modification to exercise an option. For example, if a contract has a total value of \$400,000.00 and each of the base and four option years is valued at \$80,000.00 the modification action must receive approval by the Secretary.*

**Example format:** \$400,000.00

16. Anticipated Contractor (if applicable) \*
- If for an Interagency Agreement use trading partner.
- TBD or N/A if not known.*
- Note: Do not include source selection information. If an award is a sole source, this information can be provided.**

17. Anticipated North American Industry Classification System (NAICS) code \*
- \*If this is for an Interagency Agreement use 000000*

*Skip to question 24*

#### Award/Modification to Existing

18. Action Type for Obligation \* ⌵ Dropdown

**Mark only one oval.**

- New Contract - including new Ordering Vehicles (IDIQ, BPA, BOA, etc.)
- New Task/Delivery Order
- Modification (except for incremental funding mods)
- Purchase Order
- Interagency Agreement
- Purchase Card Transaction using BIL or IRA Funds

19. Existing Procurement Instrument Identifier (PIID) number information such as; \*
- Contract Order/Mod or Requisition Number (Include all that are applicable)
- Example:** 1305M225D1234/1305M2F251234/P25001, 140802-25-1234

## 20. Base and All Exercised Options Value (To Date) \*

*The thresholds for approval apply to the total contract value inclusive of options even in the case of a modification to exercise an option. For example, if a contract has a total value of \$400,000.00 and each of the base and four option years is valued at \$80,000.00 the modification action must receive approval by the Secretary.*

**Example format:** \$400,000.00

## 21. Total Value (Base and All Options Value) \*

**Example format:** \$400,000.00

## 22. Contractor or if for an Interagency Agreement list trading partner. \*

**Note: Do not include source selection information. If an award is a sole source or a modification to an existing contract this information must be provided.**

## 23. North American Industry Classification System (NAICS) code \*

If this is for an Interagency Agreement use 000000

## Emergency

## 24. Is this request for a critical, acute, or emergency spending action that requires immediate determination for exclusion by the Agency Head? \*

 Dropdown

**Mark only one oval.**

Yes      *Skip to question 25*

No      *Skip to question 26*

*Skip to question 25*

## Details of critical, acute, or emergency spending request

25. Provide a one sentence justification for critical, acute, or emergency spending request. \*

*Skip to question 28*

## Exclusions

26. Does a General Exclusion apply for expenditures related to E.O. 14222 and Senior Procurement Executive (SPE) Memo 2025-01? \*
- Exclusions should only be used in very limited instances where there is a direct correlation of the contract and public safety.*

 Dropdown

*Mark only one oval.*

- Immigration enforcement *Skip to question 27*
- Law enforcement *Skip to question 27*
- Military (includes NOAA Corps) *Skip to question 27*
- Classified information or classified information systems. *Skip to question 27*
- Public Safety *Skip to question 27*
- Intelligence Community *Skip to question 27*
- No other exclusion applies, this is routine mission essential action  
*Skip to question 28*

## Details of Exclusion

27. Provide a one sentence justification for exclusion. \*

**NOTE:** Exclusions should only be used in very limited instances where there is a direct correlation of the contract and public safety. The example in the "Details to BLUF" may be one that could receive this application.

---

### Other Required Information

28. This action is necessary to sustain our mission? \*

*Check all that apply.*

- In response to Life
- In response to Property
- In response to Safety
- Other:

29. Describe Statutory Authority \*

*(if applicable - N/A for none)*

30. Upload a document that includes a detailed description of the need, similar to the format and information found in [Attachment B](#) of SPE Memo 2025-01. \*

Files submitted:

31. Provide a link to the folder containing the documents needed to support the request. \*

*This folder must be shared with **ago.applications@noaa.gov** before being submitted on this form so that it can be shared with the relevant approvers by the approval application.*

**Do not link to PRISM.**

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## Frequently Asked Questions Version 3.0

### Senior Procurement Executive (SPE) Memorandum 2025-01 (REVISED)<sup>1</sup>

**1. Do purchases using the Government Purchase Card (GPC) require approval in accordance with SPE Memorandum 2025-01?**

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The definition of "covered contracts and grants" excludes "direct assistance to individuals; expenditures related to immigration enforcement, law enforcement, the military, public safety, and the intelligence community; and other critical, acute, or emergency spending, as determined by the relevant Agency Head."

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**5. Are actions using funds other than annual appropriations considered "discretionary"?**

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**6. Is approval required to award a contract using funds received from another agency (incidental contracting or interagency acquisition where the Department is the servicing agency)?**

Yes. While an interagency agreement with an agency outside the Department or other agreement with a non-Federal partner where the Department is receiving funds is not a "covered contract," and therefore does not need to be approved under SPE Memorandum 2025-01, any procurement contract awarded by a Departmental office or operating unit in relation to *performance* under such an agreement would be a covered contract that must be approved consistent with the procedures laid out in the guidance.

Intra-Departmental agreements (i.e., agreements between Departmental offices and/or operating units) are subject to the approval procedures in SPE Memorandum 2025-01 if they contemplate that the servicing Departmental office or operating unit will incur obligations other than for Federal employees (in other words, funds will be obligated for disbursement to a non-Federal party, whether through a contract, grant, other transaction agreement, joint venture agreement, etc.). The proposed intra-Departmental agreement and related transaction with a non-Federal party should be reviewed under the SPE Memorandum 2025-01 process concurrently.

**7. Can we issue a letter contract, no-cost grant extension, verbal notice to proceed, or similar instrument before getting approval?**

No. Extensions of current contracts, grants, or agreements are not permitted to provide for additional time to obtain approval.

Please note that while letter contracts or similar instruments are not permitted without approval, if an approval is pending there is a contract remedy that may be considered. Federal Acquisition Regulation (FAR) 49.102(d) allows for reinstatement of terminated

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contracts if the contractor consents to the reinstatement, circumstances clearly indicate a requirement exists for the terminated items, and reinstatement is advantageous to the Government. To use this in cases where an approval has been submitted but not received and there is uncertainty as to the continued need for the requirement, a contract would need to be terminated prior to the end of the current period of performance, with it becoming effective as late as possible to avoid any termination costs. The contract may then be reinstated in accordance with the requirements of FAR 49.102(d) if approval is obtained. *No guarantee or promise of future work may be given to the contractor in conjunction with the termination for convenience and all normal procedures associated with a termination should occur (e.g. return of equipment, etc.).* Legal review of terminations shall be conducted in accordance with Commerce Acquisition Manual 1301.71.

**8. Can we exercise an option at no cost to keep a contract open while we await approval?**

No. Extensions of current contracts, grants, or agreements, including exercising a no cost option, are not permitted to provide for additional time to obtain approval.

**9. Can we issue a No-Cost Extension (NCE) to a grant to allow for a recipient to do administrative (no-cost) tasks, not while we await approval for a funded action?**

Yes, in this situation a NCE to perform administrative (no-cost) tasks is not subject to the approval process.

**10. What happens if we don't get approval before a contract expires?**

If approval is received after a contract expires, necessary goods and services will need to be purchased under a new contractual instrument.

**11. Do we need approval to deobligate funds or issue administrative modifications?**

No, this process is not required for modifications that deobligate funds or make administrative changes.

**12. Do we need this approval to add incremental funding to an existing contract or line item?**

No, this process is not required for modifications to add incremental funding providing that adding incremental funding is not used as a mechanism to circumvent the approval requirements required by this SPE Memorandum or other applicable guidance.

**13. Does the total value apply to the value of the option to be exercised or the total value of the contract when issuing a modification to exercise an option?**

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The thresholds for approval apply to the total contract value inclusive of options even in the case of a modification to exercise an option. For example, if a contract has a total value of \$400,000 and each of the base and four option years is valued at \$80,000, the modification action must receive approval by the Secretary.

**14. With respect to FAQ #14, does the example also apply to a Grant/Cooperative Agreement/OTA?**

Yes, the thresholds for approval apply to a Grant/Cooperative Agreement/OTA. See SPE 2025-01, FN#3.

**15. Can the awarding official issue a solicitation in advance of obligation approval?**

The SPE Memorandum 2025-01 does not prohibit the issuance of solicitations, NOFOs or other requests for applications. Although it is not prohibited, it is recommended that approval is obtained as soon as practicable to ensure that vendors/applicants are not submitting proposals/applications in response to solicitations/NOFOs that will not end up being awarded. Early coordination with leadership is also important in order to ensure that they are aware of and support actions being publicized.

**16. Attachment A of SPE Memo 2025-01 outlines a delegation from the Secretary for new contracts. Does this delegation also cover modifications for the exercise of options or extensions?**

Yes, modifications for the exercise of options or extensions, where the total award value is less than \$100,000, may be approved by the officials indicated in the delegation.

**17. Section 1c of SPE Memo 2025-01 requires consultation with the Office of General Counsel. Is this bureau-level OGC or the Financial Assistance Law Division (FALD)?**

For the purposes of the memo the consultation should be with FALD for financial assistance or the Contract Law Division (CLD) for contracts who will then coordinate internally with the General Litigation Division and with chief counsel offices, as appropriate.

**18. What is considered the total value for a Blanket Purchase Agreement?**

For purposes of a BPA, the total value is the total estimated ceiling of the agreement inclusive of any optional periods.

**19. May FAR 52.217-9, *Option to Extend the Term of the Contract*, be tailored to address situations in which an approval has not been approved?**

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Yes, FAR 52.217-9 may be tailored and changes may be negotiated with a contractor. A sample tailored clause is included below. The subsequent negotiation to exercise the option may include start-up costs associated with restarting the work but may not include any costs associated with the period for which the contract was stopped after the expiration of the previous period.

**FAR 52.217-9 Option to Extend the Term of the Contract (Mar 2000)**

(a) The Government may extend the term of this contract by written notice to the Contractor within \_\_\_\_\_ [*insert the period of time within which the Contracting Officer may exercise the option*]; provided that the Government gives the Contractor a preliminary written notice of its intent to extend at least \_\_\_\_\_ days [*60days unless a different number of days is inserted*] before the contract expires. The preliminary notice does not commit the Government to an extension. If the Government fails to extend the term of the contract within the period identified and the Government has provided a written notice to the Contractor that the action is undergoing review in accordance with Department of Commerce procedures for implementing Executive Order 14222 the contractor shall stop all work and incur no costs to be charged to the Government. Once the Department of Commerce’s review process has occurred, or no later than 30 days from the initial review notification, the Government will notify the contractor if the option may be exercised and, if so, adjust start and end dates of the period of performance accordingly. The Government will then extend the term of the contract with a bilateral modification.

(b) If the Government exercises this option, the extended contract shall be considered to include this option clause.

(c) The total duration of this contract, including the exercise of any options under this clause, shall not exceed \_\_\_\_\_ (*months*) (*years*).

(End of clause)

**20. May FAR 52.217-8, *Option to Extend Services*, be tailored to address situations in which an approval has not been approved?**

Yes, FAR 52.217-8 may be tailored and changes may be negotiated with a contractor. A sample tailored clause is included below. The subsequent negotiation to exercise the option may include start-up costs associated with restarting the work but may not

include any costs associated with the period for which the contract was stopped after the expiration of the previous period.

**FAR 52.217-8 Option to Extend Services (Nov 1999)**

(a) The Government may require continued performance of any services within the limits and at the rates specified in the contract. These rates may be adjusted only as a result of revisions to prevailing labor rates provided by the Secretary of Labor. The option provision may be exercised more than once, but the total extension of performance hereunder shall not exceed 6 months. The Contracting Officer may exercise the option by written notice to the Contractor within \_\_\_\_ *[insert the period of time within which the Contracting Officer may exercise the option]*.

If the Government fails to extend the term of the contract within the period identified and the Government has provided a written notice to the Contractor that the action is undergoing review in accordance with Department of Commerce procedures for implementing Executive Order 14222 the contractor shall stop all work and incur no costs to be charged to the Government. Once the Department of Commerce's review process has occurred, or no later than 30 days from the initial review notification, the Government will notify the contractor if the option may be exercised and, if so, adjust start and end dates of the period of performance accordingly. The Government will then extend the term of the contract with a bilateral modification.

(End of clause)

**21. According to the Executive Order 14222, approval is needed for "federally funded travel," would that apply to contractors conducting travel in accordance with their contracts?**

No, approval for travel is only needed when directly funded by the Department, not as a condition to fulfill a requirement of an existing contract and the contractor is funding the travel with obligated funds.

**22. Are there any extensions that are allowed without an approval in accordance with SPE Memo 2025-01?**

No cost extensions to provide additional time to obtain approval are not permitted (See FAQ #8). However, no cost extensions that do not add additional work to an awarded contract may be allowed on a case-by-case basis when the extension is necessary for a different reason. For example, if a contractor experiences a delay and an extension is needed to allow for the previously awarded scope of work to be completed (e.g. permit

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delays in a construction contract, Government delays, etc.) those modifications would not need to be approved in accordance with SPE Memo 2025-01. The file should be documented appropriately for the modification as to why the extension does not circumvent the approval requirements of SPE Memo 2025-01.

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## Frequently Asked Questions Version 4.0

### Senior Procurement Executive (SPE) Memorandum 2025-01 (REVISED)<sup>1</sup>

**1. Do purchases using the Government Purchase Card (GPC) require approval in accordance with SPE Memorandum 2025-01?**

No, approvals for purchase card transactions are not covered by SPE Memorandum 2025-01. GPC cardholders shall follow Departmental guidance on approved use and reporting requirements associated with such cards. Reporting on these actions in accordance with SPE Memorandum 2025-01 is not required.

**2. Who is the Agency Head for the purposes of the Executive Order 14222?**

For purposes of the Executive Order the Agency Head is the Secretary of Commerce.

**3. Are there exceptions or exclusions to the approval requirements outlined in SPE Memorandum 2025-01?**

The Executive Order does not apply to (a) Law enforcement officers, as defined in 5 U.S.C. 5541(3) and 5 C.F.R. 550.103, or covered contracts and grants directly related to the enforcement of Federal criminal or immigration law; (b) U.S. Customs and Border Protection and U.S. Immigration and Customs Enforcement in the Department of Homeland Security; (c) the Uniformed Services, as defined in 20 C.F.R. 404.1330; (d) any other covered grant or contract, agency component, or real property that the relevant Agency Head exempts in writing from all or part of this order, in consultation with the agency's DOGE Team Lead and the Director of OMB; and (e) classified information or classified information systems. EO 14222 § 4.

The definition of "covered contracts and grants" excludes "direct assistance to individuals; expenditures related to immigration enforcement, law enforcement, the military, public safety, and the intelligence community; and other critical, acute, or emergency spending, as determined by the relevant Agency Head."

Also note that Footnote 1 in SPE Memorandum 2025-01 (REVISED) contains definitions of covered contracts and grants, discretionary spending, contracts, and related instruments (including agreements).

<sup>1</sup> All references to SPE Memorandum 2025-01 will be to the REVISED memorandum, issued on March 14, 2025.

**4. How do I know if one of these exceptions or exclusions applies to my requirement?**

Requirements officials must consult with their Departmental office's or operating unit's senior political appointee as identified in SPE Memorandum 2025-01 to aid in making that determination. All exceptions or exclusions must be reported on a weekly basis to the Secretary per the reporting requirements outlined in the SPE Memorandum.

**5. Are actions using funds other than annual appropriations considered "discretionary"?**

See Footnote 1 of the SPE Memorandum 2025-01 for discussion of the definition of "discretionary" for the purposes of the required approval.

**6. Is approval required to award a contract using funds received from another agency (incidental contracting or interagency acquisition where the Department is the servicing agency)?**

Yes. While an interagency agreement with an agency outside the Department or other agreement with a non-Federal partner where the Department is receiving funds is not a "covered contract," and therefore does not need to be approved under SPE Memorandum 2025-01, any procurement contract awarded by a Departmental office or operating unit in relation to *performance* under such an agreement would be a covered contract that must be approved consistent with the procedures laid out in the guidance.

Intra-Departmental agreements (i.e., agreements between Departmental offices and/or operating units) are subject to the approval procedures in SPE Memorandum 2025-01 if they contemplate that the servicing Departmental office or operating unit will incur obligations other than for Federal employees (in other words, funds will be obligated for disbursement to a non-Federal party, whether through a contract, grant, other transaction agreement, joint venture agreement, etc.). The proposed intra-Departmental agreement and related transaction with a non-Federal party should be reviewed under the SPE Memorandum 2025-01 process concurrently.

**7. Can we issue a letter contract, no-cost grant extension, verbal notice to proceed, or similar instrument before getting approval?**

No. Extensions of current contracts, grants, or agreements are not permitted to provide for additional time to obtain approval.

Please note that while letter contracts or similar instruments are not permitted without approval, if an approval is pending there is a contract remedy that may be considered. Federal Acquisition Regulation (FAR) 49.102(d) allows for reinstatement of terminated

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contracts if the contractor consents to the reinstatement, circumstances clearly indicate a requirement exists for the terminated items, and reinstatement is advantageous to the Government. To use this in cases where an approval has been submitted but not received and there is uncertainty as to the continued need for the requirement, a contract would need to be terminated prior to the end of the current period of performance, with it becoming effective as late as possible to avoid any termination costs. The contract may then be reinstated in accordance with the requirements of FAR 49.102(d) if approval is obtained. *No guarantee or promise of future work may be given to the contractor in conjunction with the termination for convenience and all normal procedures associated with a termination should occur (e.g. return of equipment, etc.).* Legal review of terminations shall be conducted in accordance with Commerce Acquisition Manual 1301.71.

- 8. Can we exercise an option at no cost to keep a contract open while we await approval?**  
No. Extensions of current contracts, grants, or agreements, including exercising a no cost option, are not permitted to provide for additional time to obtain approval.
- 9. Can we issue a No-Cost Extension (NCE) to a grant to allow for a recipient to do administrative (no-cost) tasks, not while we await approval for a funded action?**  
Yes, in this situation a NCE to perform administrative (no-cost) tasks is not subject to the approval process.
- 10. What happens if we don't get approval before a contract expires?**  
If approval is received after a contract expires, necessary goods and services will need to be purchased under a new contractual instrument.
- 11. Do we need approval to deobligate funds or issue administrative modifications?**  
No, this process is not required for modifications that deobligate funds or make administrative changes.
- 12. Do we need this approval to add incremental funding to an existing contract or line item?**  
No, this process is not required for modifications to add incremental funding providing that adding incremental funding is not used as a mechanism to circumvent the approval requirements required by this SPE Memorandum or other applicable guidance.

**13. Does the total value apply to the value of the option to be exercised or the total value of the contract when issuing a modification to exercise an option?**

The thresholds for approval apply to the total contract value inclusive of options even in the case of a modification to exercise an option. For example, if a contract has a total value of \$400,000 and each of the base and four option years is valued at \$80,000, the modification action must receive approval by the Secretary.

**14. With respect to FAQ #13, does the example also apply to a Grant/Cooperative Agreement/OTA?**

Yes, the thresholds for approval apply to a Grant/Cooperative Agreement/OTA. See SPE 2025-01, FN#3.

**15. Can the awarding official issue a solicitation in advance of obligation approval?**

The SPE Memorandum 2025-01 does not prohibit the issuance of solicitations, NOFOs or other requests for applications. Although it is not prohibited, it is recommended that approval is obtained as soon as practicable to ensure that vendors/applicants are not submitting proposals/applications in response to solicitations/NOFOs that will not end up being awarded. Early coordination with leadership is also important in order to ensure that they are aware of and support actions being publicized.

**16. Attachment A of SPE Memo 2025-01 outlines a delegation from the Secretary for new contracts. Does this delegation also cover modifications for the exercise of options or extensions?**

Yes, modifications for the exercise of options or extensions, where the total award value is less than \$100,000, may be approved by the officials indicated in the delegation.

**17. Section 1c of SPE Memo 2025-01 requires consultation with the Office of General Counsel. Is this bureau-level OGC or the Financial Assistance Law Division (FALD)?**

For the purposes of the memo the consultation should be with FALD for financial assistance or the Contract Law Division (CLD) for contracts who will then coordinate internally with the General Litigation Division and with chief counsel offices, as appropriate.

**18. What is considered the total value for a Blanket Purchase Agreement?**

For purposes of a BPA, the total value is the total estimated ceiling of the agreement inclusive of any optional periods.

**19. May FAR 52.217-9, *Option to Extend the Term of the Contract*, be tailored to address situations in which an approval has not been approved?**

Yes, FAR 52.217-9 may be tailored and changes may be negotiated with a contractor. A sample tailored clause is included below. The subsequent negotiation to exercise the option may include start-up costs associated with restarting the work but may not include any costs associated with the period for which the contract was stopped after the expiration of the previous period.

**FAR 52.217-9 Option to Extend the Term of the Contract (Mar 2000)**

(a) The Government may extend the term of this contract by written notice to the Contractor within \_\_\_\_\_ [*insert the period of time within which the Contracting Officer may exercise the option*]; provided that the Government gives the Contractor a preliminary written notice of its intent to extend at least \_\_\_\_\_ days [*60days unless a different number of days is inserted*] before the contract expires. The preliminary notice does not commit the Government to an extension. If the Government fails to extend the term of the contract within the period identified and the Government has provided a written notice to the Contractor that the action is undergoing review in accordance with Department of Commerce procedures for implementing Executive Order 14222 the contractor shall stop all work and incur no costs to be charged to the Government. Once the Department of Commerce's review process has occurred, or no later than 30 days from the initial review notification, the Government will notify the contractor if the option may be exercised and, if so, adjust start and end dates of the period of performance accordingly. The Government will then extend the term of the contract with a bilateral modification.

(b) If the Government exercises this option, the extended contract shall be considered to include this option clause.

(c) The total duration of this contract, including the exercise of any options under this clause, shall not exceed \_\_\_\_\_ (*months*) (*years*).

(End of clause)

**20. May FAR 52.217-8, *Option to Extend Services*, be tailored to address situations in which an approval has not been approved?**

Yes, FAR 52.217-8 may be tailored and changes may be negotiated with a contractor. A sample tailored clause is included below. The subsequent negotiation to exercise the

option may include start-up costs associated with restarting the work but may not include any costs associated with the period for which the contract was stopped after the expiration of the previous period.

**FAR 52.217-8 Option to Extend Services (Nov 1999)**

(a) The Government may require continued performance of any services within the limits and at the rates specified in the contract. These rates may be adjusted only as a result of revisions to prevailing labor rates provided by the Secretary of Labor. The option provision may be exercised more than once, but the total extension of performance hereunder shall not exceed 6 months. The Contracting Officer may exercise the option by written notice to the Contractor within \_\_\_\_ *[insert the period of time within which the Contracting Officer may exercise the option]*.

If the Government fails to extend the term of the contract within the period identified and the Government has provided a written notice to the Contractor that the action is undergoing review in accordance with Department of Commerce procedures for implementing Executive Order 14222 the contractor shall stop all work and incur no costs to be charged to the Government. Once the Department of Commerce's review process has occurred, or no later than 30 days from the initial review notification, the Government will notify the contractor if the option may be exercised and, if so, adjust start and end dates of the period of performance accordingly. The Government will then extend the term of the contract with a bilateral modification.

(End of clause)

**21. According to the Executive Order 14222, approval is needed for "federally funded travel," would that apply to contractors conducting travel in accordance with their contracts?**

No, approval for travel is only needed when directly funded by the Department, not as a condition to fulfill a requirement of an existing contract and the contractor is funding the travel with obligated funds.

**22. Are there any extensions that are allowed without an approval in accordance with SPE Memo 2025-01?**

No cost extensions to provide additional time to obtain approval are not permitted (See FAQ #8). However, no cost extensions that do not add additional work to an awarded contract may be allowed on a case-by-case basis when the extension is necessary for a different reason. For example, if a contractor experiences a delay and an extension is

needed to allow for the previously awarded scope of work to be completed (e.g. permit delays in a construction contract, Government delays, etc.) those modifications would not need to be approved in accordance with SPE Memo 2025-01. The file should be documented appropriately for the modification as to why the extension does not circumvent the approval requirements of SPE Memo 2025-01.

**23. Do SF-182s, SF-1s, or CD-410s need to follow the approval process outlined in SPE Memo 2025-01?**

No, the approval requirements of SPE Memo 2025-01 are not applicable to SF-182s, SF-1s or CD-410s.

**24. Do we need this approval to add incremental funding to an existing Grant, Cooperative Agreement or OTA?**

Yes, supplemental or incremental actions involving the obligation of funds must receive approval by the process outlined in SPE Memo 2025-01. However, if an award contemplates supplemental or incremental funding actions and is approved by the process outlined in SPE Memo 2025-01, then it does not need to be re-approved at the time of obligation.

**25. What do I do when a contract award approval is pending and a current contractor says it will continue to perform "at risk"?**

The Government shall not request or encourage a contractor to perform "at risk" in the absence of an awarded contract. The Government must proactively make every effort to avoid a contractor performing at risk. If a contractor informs the Government that it chooses to continue performing at risk after a current period of performance ends, the contracting officer must proactively provide the contractor with written notice stating that the contractor made the choice to continue performing at risk and obtain the contractor's acknowledgement and agreement that performance will be without compensation.



SENIOR PROCUREMENT EXECUTIVE MEMORANDUM 2025-01 (REVISED 4/7/2025)

**ACTION**

**MEMORANDUM FOR:** Heads of Departmental Offices and Operating Units

**FROM:** Olivia J. Bradley  
Senior Procurement Executive and  
Director for Acquisition Management



**SUBJECT:** Implementing the President's "Department of Government Efficiency" Cost Efficiency Initiative

**Background**

On February 26, 2025, the President issued Executive Order 14222, entitled "Implementing the President's 'Department of Government Efficiency' Cost Efficiency Initiative." This Executive Order requires that each agency review its covered contracts and grants<sup>1</sup> and its contracting policies, procedures, and personnel within 30 days of the date of the Order and issue guidance on signing new contracts or grants or modifying existing contracts or grants to promote Government efficiency and policies of the Administration<sup>2</sup>. Prior to issuing the guidance, the Secretary of Commerce may approve new contracts or grants on a case-by-case basis.

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<sup>1</sup> The EO defines "[c]overed contracts and grants" to mean "discretionary spending through Federal contracts, grants, loans, and related instruments," but excludes "direct assistance to individuals; expenditures related to immigration enforcement, law enforcement, the military, public safety, and the intelligence community; and other critical, acute, or emergency spending, as determined by the relevant Agency Head. "

For purposes of this guidance:

- "Discretionary spending" means any spending not within the scope of the specifically enumerated exclusions noted above, and is irrespective of the form of budget authority to be obligated or the statutory authority under which it was made available.
- "Contracts" has the meaning as defined in FAR 2.101 and includes blanket purchase agreements, orders under blanket purchase agreements, and orders under indefinite delivery, indefinite quantity contracts.
- "Related instruments" includes (1) intra-Departmental and interagency agreements (IAAs) regardless of form or format that would obligate Departmental office or operating unit funds; (2) Other Transaction Authority (OTA) agreements; (3) joint venture agreements; (4) real property transactions; and (5) any other form of non-procurement, non-financial assistance, or non-litigation settlement agreement that would obligate Departmental office or operating unit funds. However, it excludes intra-Departmental agreements to pay for Federal personnel/employee work/support to Departmental offices and operating units.

<sup>2</sup> The EO does not apply to (a) Law enforcement officers, as defined in 5 U.S.C. 5541(3) and 5 C.F.R. 550.103, or covered contracts and grants directly related to the enforcement of Federal criminal or immigration law; (b) U.S.

## Purpose

The purpose of this Memorandum is to provide guidance and procedures to obtain case-by-case approval to award new covered contracts and grants or issue modifications to exercise options for, or extensions of, covered contracts, and amendments for continuations of multi-year covered grant awards.

## Required Actions

1. All new covered contracts and grants, modifications to exercise options for, or extensions of, covered contracts, and amendments for continuations of multi-year covered grant awards will require review and approval, before the action can be executed. The process for obtaining approval is as follows:
  - a. **Actions Under \$100,000<sup>3</sup>:**
    - i. In accordance with the Secretary's Delegation of Authority dated March 10, 2025,<sup>4</sup> Departmental offices and operating units with political leadership may approve actions under \$100,000, subject to performing the following actions:
      1. Instruct program officials on the Departmental office- or operating unit-developed procedures for obtaining approval from their senior political appointee. A sample of the information to be submitted is included in Attachment B.
      2. Instruct program officials to provide their contracting/grants/agreements officers with written certification from the senior political appointee if an action is approved.
    - ii. Departmental offices and operating units with no political leadership shall perform the following actions:
      1. Instruct program officials on the Departmental office- or operating unit-developed procedures for obtaining approval from the U.S. Department of Commerce Deputy Chief of Staff for Policy. A sample of the information to be submitted is included in Attachment B.
      2. Instruct program officials to provide their contracting/grants/agreements officers with written certification from the U.S. Department of Commerce Deputy Chief of Staff for Policy if an action is approved.

Customs and Border Protection and U.S. Immigration and Customs Enforcement in the Department of Homeland Security; (c) the Uniformed Services, as defined in 20 C.F.R. 404.1330; (d) any other covered grant or contract, agency component, or real property that the relevant Agency Head exempts in writing from all or part of this order, in consultation with the agency's DOGE Team Lead and the Director of OMB; and (e) classified information or classified information systems. EO 14222 § 4.

<sup>3</sup> Values indicated within this memorandum are for the total covered contract and grant value inclusive of options or continuations contemplated at award. However, if approval is being sought for the final option period and the value of that final option period is less than \$100,000, then approval can be given by the delegates pursuant to the Secretary's delegation even if the total award value exceeds \$100,000.

<sup>4</sup> See Attachment A.

- b. **Actions Equal to or Greater than \$100,000:**
  - i. Departmental offices and operating units with political leadership shall perform the following actions:
    - 1. Instruct program officials on the Departmental office- or operating unit-developed procedures for obtaining approval from the Secretary through their senior political appointee. A sample of the information to be submitted is included in Attachment B.
    - 2. Instruct program officials to provide their contracting or grants/agreements officers with written certification from their senior political appointee if an action is approved by the Secretary.
  - ii. Departmental offices and operating units with no political leadership shall perform the following actions:
    - 1. Instruct program officials on the Departmental office- or operating unit-developed procedures for obtaining approval from the Secretary. A sample of the information to be submitted is included in Attachment B.
    - 2. Instruct program officials to provide their contracting/grants/agreements officers with written certification if an action is approved by the Secretary.
- c. After written certification of approval of the action, contracting/grants/agreements officers may proceed with award or issuance. If a disapproval is received, the contracting/grants/agreements officers shall not proceed and shall consult with the Office of the General Counsel before canceling the action to ensure consistency with any applicable court orders.
- d. Departmental offices and operating units should continue with all planning and pre-award activities (including funds certification), finalizing performance requirements, market research, conducting negotiations, preparing modifications or amendments, and obtaining necessary approvals. Approval for these actions shall occur as soon as practicable in the process.

### **Reporting**

- a. Operating units with political leadership shall provide the Office of Acquisition Management at [OAM Mailbox@doc.gov](mailto:OAM_Mailbox@doc.gov) with a copy of all submissions to senior political appointees and/or the Secretary, so the Office of the Secretary may have simultaneous situational awareness of submitted actions. If the actions are not being submitted through email, access to whatever system of review is being used shall be provided to the Office of Acquisition Management<sup>5</sup>. Operating units remain responsible for routing actions for approval.

<sup>5</sup>Operating units granting access to named individuals in lieu of email submission shall contact OAM for further coordination.

- b. Departmental offices<sup>6</sup> and operating units with political leadership shall provide a weekly report to the Secretary and copy the Office of Acquisition Management at [OAM\\_Mailbox@doc.gov](mailto:OAM_Mailbox@doc.gov) on all actions that have been reviewed, including any actions that are specifically excluded from Executive Order 14222 (see footnotes 1 and 2 above). Reports shall include the following information: Procurement Instrument Identifier (PIID)<sup>7</sup> or other unique identifier if available, modification/amendment number (if any), obligation amount, total award value, period of performance, whether the action was excluded from Executive Order 14222 (and reason for the exclusion), and whether the action was approved.

### **Effective Date**

This Memorandum is effective immediately and remains in effect until rescinded.

### **Questions**

Please direct any questions regarding this guide to [OAM Mailbox@doc.gov](mailto:OAM_Mailbox@doc.gov).

**CC:** Bureau Procurement Officials  
Assistant General Counsel for Transactions and Program Management  
Assistant General Counsel for Employment, Litigation, and Information  
Chief, Contract Law Division  
Chief, Financial Assistance Law Division  
Chief, General Law Division  
Chief, General Litigation Division

<sup>6</sup> OAM will submit the report on behalf of Departmental Offices.

<sup>7</sup> This should be the PIID as defined by FPDS element 1A.

**INFORMATION - NOAA Grants Obligation Approval Request Process**

1 message

on behalf of Jeffrey S. Thomas - NOAA Federal &lt;jeffrey.s.thomas@noaa.gov&gt;

Wed, Apr 9, 2025 at 9:28 AM

To: \_NOAA AGO DAA Staff Offices &lt;daa.staffoffices@noaa.gov&gt;, \_AGO DISTRO TO NOAA CFOS &lt;distro.noaa.cfos@noaa.gov&gt;, \_AGO Distro to NOAA Chiefs of staff &lt;distro\_noaa\_cos@noaa.gov&gt;

Cc: Nancy Hann - NOAA Federal &lt;Nancy.Hann@noaa.gov&gt;, \_AGO Personnel &lt;ago.personnel@noaa.gov&gt;, Laura Grimm - NOAA Federal &lt;laura.grimm@noaa.gov&gt;, \_OFA GMAC &lt;gmac@noaa.gov&gt;, \_NOAA Policy &lt;noaa.policy@noaa.gov&gt;

**The following message is sent on behalf of Jeffrey Thomas, AGO Director****NOAA** NATIONAL OCEANIC AND  
ATMOSPHERIC ADMINISTRATION  
UNITED STATES DEPARTMENT OF COMMERCE

**MEMORANDUM FOR:** Deputy Assistant Administrators  
Staff Office Directors  
Chief Financial Officers  
Chiefs of Staff

**CC:** Acquisition and Grants Office Personnel  
Grants Management Advisory Council  
Deputy Undersecretary for Operations  
NOAA Chief of Staff  
NOAA DUSO Policy Team

**FROM:** Jeffrey S. Thomas, Director  
Acquisition and Grants Office

**SUBJECT:** INFORMATION - NOAA Grants Obligation Approval  
Request Process

**DATE:** April 9, 2025

Effective April 9, 2025, the NOAA Grants [Obligation Approval Request Form](#) is active and is the sole point of entry for covered grants and financial assistance actions that require obligation approval in accordance with [SPE Memo 2025](#) (revised). The [SPE Memo Frequently Asked Questions](#) provides useful information regarding requirements and coverage. The federal financial assistance approval process follows the same basic requirements as those outlined in the NOAA Contract Obligation Approval Request Form issued on March 25th, but is specifically tailored to grants and cooperative agreements. Program officials should consider the following information when submitting requests for federal financial assistance obligation approval.

1. **Prioritize** - Program offices should first prioritize submitting NOAA Grant Obligation Approval Request Form for awards currently in Grants Management Division before submitting other actions for approval.
2. **Additional Summary Documentation** - For actions exceeding \$100,000, requesters must upload a stand-alone document that provides details of the request. Samples of the Additional Summary Documentation are provided in [Attachment B](#) (Grants Business Case) of [SPE Memo 2025-01](#) (revised 4/7/2025). It is important to closely follow the model format provided.

Detailed instructions are provided in the NOAA Grants Obligation Approval Request Form. Review the [SPE Memo Frequently Asked Questions](#) and the [NOAA Grants Obligation Approval Process FAQs](#) for more information. Email questions about this process to the NOAA Leadership Policy Team at [NOAA.Policy@noaa.gov](mailto:NOAA.Policy@noaa.gov).

# NOAA Grants Approval Request Form (Revised 2025-04-01)

The program office must complete this form to request approval to make a financial assistance award as required by [SPE Memo 2025-01](#) and [E.O. 14222, Implementing the President's "Department of Government Efficiency" Cost Efficiency Initiative](#).

Before submitting this form, requesters should follow any internal review procedures established within their organization. Requestors must review the proposed award to ensure that it does not conflict with the Administration's priorities and guidelines.

Quick Links to: [New GR Submissions \(Grants TAB\)](#), [NOAA FAQs](#) and [SPE Memo FAQs](#)  
[Link to full form to see questions in advance](#)

Need to cancel a request or make changes? *Note: Changes will require a new submission.*

Email: [sda.ago@noaa.gov](mailto:sda.ago@noaa.gov)

Subject: GR-25-00123, Grant Request Change/Cancel

## **Actions that require Agency Head Determination (i.e. Exclusions, Emergencies)**

POC submits internal LO Approval Request form --> Deputy Assistant Administrator/Staff Office Director or Line/Staff Office Senior Leadership concurs --> Requests are forwarded immediately and marked accordingly to NOAA Senior Political Leadership --> DOC Secretary Approval.

## **Actions below \$100,000**

POC submits internal LO Approval Request form --> Deputy Assistant Administrator/Staff Office Director or Line/Staff Office Senior Leadership concurs --> Each day, requests are forwarded to NOAA Senior Political Leadership --> NOAA Senior Leadership Approval.

## **Actions equal to or above \$100,000**

POC submits internal LO Approval Request form --> Deputy Assistant Administrator/Staff Office Director or Line/Staff Office Senior Leadership concurs --> Each day, requests are forwarded to NOAA Senior Political Leadership (FOR CONSIDERATION) --> DOC Secretary for Approval.

## **Written Certification of Approval**

Line offices should monitor the **NOAA GR PL Approval** sheet regularly to check on requests for approvals.

## **Disapproval**

If a request is disapproved, the requester must consult with the Office of General Counsel Federal Assistance Law Division (FALD) before canceling the action to ensure consistency with certain preliminary injunction requirements that may apply.

---

\* Indicates required question

1. Email \*

2. Line Office \*

If your office is not represented below, please submit your office and approvers [here](#)

 Dropdown

*Mark only one oval.*

NMFS

NOS

NESDIS

OAR

NWS

OSEC

3. BLUF \*

*Bottom Line Up Front (BLUF)- 1-2 sentences - what the action does, any important info to know.*

***Example:*** *Under this financial assistance award the applicant will provide direct assistance payment to the commercial fisherman.*

---

4. Date approval needed by \*

*Generally, this should be at least sixty days prior to the period of performance start date to allow Grants Management Division adequate time review and execute the award.*

*Example: January 7, 2019*

5. Amount of Obligation \*

**Example format:** \$80,000.00

*Note: This amount is the current planned obligation and not the total federal funding amount of a multiyear award.*

6. Greater than or equal to \$100,000? \*

*The thresholds for approval apply to the total financial assistance award value inclusive of options even in the case of a modification to exercise an option. For example, if a financial assistance award has a total value of \$400,000.00 and each of the base and four option years is valued at \$80,000.00 the modification action must receive approval by the Secretary.*  
**Example format:** \$400,000.00

 Dropdown

*Mark only one oval.*

Yes

No

7. Details to the BLUF

*This question is an extension of the BLUF to provide only additional critical details on what the action does, why it's important, what is at risk if it is not approved.*

**Example:** *The purpose of this financial assistance award is to provide direct payments to commercial fisherman due to commercial fishery failures and fishery resource disasters declared by the Secretary of Commerce in calendar year 2017. If this is not approved it will impact the fishing communities and businesses will likely face significant economic hardship and potential long-term damage to their livelihood.*

8. Does this action obligation include funding from BIL/IRA? \*

 Dropdown

*Mark only one oval.*

Yes

No

9. Point of Contact (who can answer questions or provide additional information) \*

*Name only\* Phone and email on next questions*

10. Point of Contact (who can answer questions or provide additional information) \*

*Phone Only\* Email on next question*

11. Point of Contact (who can answer questions or provide additional information) \*

*Email Only\**

### Financial Assistance Phase

12. What phase of the grant process is this action in? \*

 Dropdown

*Mark only one oval.*

New Award     *Skip to question 13*

Amendment to an Existing Award     *Skip to question 17*

### New Award Information

13. Federal Award Identification Number (FAIN) or Application ID Number (Include all \* that are applicable)

**Example:** NA25OAR4320123/NA19OAR4230073-T3-01S105/10971932

14. Estimated Total Federal Award \*

**Example format:** \$400,000.00

15. Applicant Name \*

16. Notice of Funding Opportunity (NOFO) or Request for Applications (RFA) number \*

**Example:** NOAA-OAR-CPO-2025-29842/NOAA-NESDIS-CIPO-2025-29886

*The NOFO/RFA number must appear in the way it is written in eRA*

*Skip to question 23*

#### Amendments to Existing Awards

17. Financial Assistance Award Type for Obligation \*

 Dropdown

**Mark only one oval.**

- Supplemental
- Renewal
- Release of Funds/Continuations

18. Existing Federal Award Identification Number (FAIN) \*

**Example:** NA25OAR4320123/NA19OAR4230073-T3-01S105

19. Total Federal Funded Amount Obligated (To Date) \*

*The thresholds for approval apply to the total federal award inclusive of the multi-year funding. For example, if a financial assistance award has a total federal funding amount of \$400,000.00 and each year is budgeted for \$80,000.00 the total federal funding amount must receive approval by the Secretary.*

**Example format:** \$400,000.00

20. Estimated Total Federal Award \*

**Example format:** \$400,000.00

21. Recipient Name \*

22. Notice of Funding Opportunity (NOFO) or Request for Applications (RFA) number \*

**Example:** NOAA-OAR-CPO-2025-29842/NOAA-NESDIS-CIPO-2025-29886

*The NOFO/RFA number must appear in the way it is written in eRA*

Emergency

23. Is this request for a critical, acute, or emergency spending action that requires immediate determination for exclusion by the Agency Head? \*

 Dropdown

*Mark only one oval.*

Yes      *Skip to question 24*

No      *Skip to question 25*

*Skip to question 24*

Details of critical, acute, or emergency spending request

24. Provide a one sentence justification for critical, acute, or emergency spending request. \*

*Skip to question 27*

### Exclusions

25. Does a General Exclusion apply for expenditures related to E.O. 14222 and Senior Procurement Executive (SPE) Memo 2025-01? \*

*Exclusions should only be used in very limited instances where there is a direct correlation of the Federal Award and public safety.*

 Dropdown

*Mark only one oval.*

- Immigration enforcement *Skip to question 26*
- Law enforcement *Skip to question 26*
- Military (includes NOAA Corps) *Skip to question 26*
- Classified information or classified information systems. *Skip to question 26*
- Public safety *Skip to question 26*
- Intelligence community *Skip to question 26*
- No other exclusion applies, this is routine mission essential action  
*Skip to question 27*

### Details of Exclusion

26. Provide a one sentence justification for exclusion. \*

**NOTE:** Exclusions should only be used in very limited instances where there is a direct correlation of the Federal Award and public safety. The example in the "Details to BLUF" may be one that could receive this application.

#### Other Required Information

27. This action is necessary to sustain our mission? \*

*Check all that apply.*

- In response to Life
- In response to Property
- In response to Safety
- N/A

28. Describe the Statutory Authority for you award \*

*(if applicable - N/A for none)*

29. Upload a document that includes a detailed description of the need, similar to the \*  
format and information found in [Attachment B](#) of SPE Memo 2025-01.

Files submitted:

30. Provide a link to the folder containing the documents needed to support the request. \*

*This folder must be shared with [ago.applications@noaa.gov](mailto:ago.applications@noaa.gov) before being submitted on this form so that it can be shared with the relevant approvers by the approval application.*

*Tip: Copy link from the Google tab header and not the copied link used for sharing.\**

**Do not link to eRA.**

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This content is neither created nor endorsed by Google.

Google Forms

**INFORMATION - NOAA Contracts and Grants Obligation Request Process**

1 message

on behalf of Jeffrey S. Thomas - NOAA Federal &lt;jeffrey.s.thomas@noaa.gov&gt;

Mon, Apr 21, 2025 at 3:18 PM

To: \_NOAAAGO DAA Staff Offices &lt;daa.staffoffices@noaa.gov&gt;, \_AGO DISTRO TO NOAA CFOS &lt;distro.noaa.cfos@noaa.gov&gt;, \_AGO Distro to NOAA Chiefs of staff &lt;distro\_noaa\_cos@noaa.gov&gt;

Cc: \_AGO Personnel &lt;ago.personnel@noaa.gov&gt;, Nancy Hann - NOAA Federal &lt;Nancy.Hann@noaa.gov&gt;, \_OFAAMAC &lt;amac@noaa.gov&gt;, \_NOAA Policy &lt;noaa.policy@noaa.gov&gt;

**The following message is sent on behalf of Jeffrey Thomas, AGO Director**

**MEMORANDUM FOR:** Deputy Assistant Administrators  
Staff Office Directors  
Chief Financial Officers  
Chiefs of Staff

**CC:** Acquisition and Grants Office Personnel  
Acquisition Management Advisory Council  
Deputy Undersecretary for Operations  
NOAA Senior Policy Team

**FROM:** Jeffrey S. Thomas, Director  
Acquisition and Grants Office

**SUBJECT:** INFORMATION - NOAA Contracts and Grants Obligation Request Process

**DATE:** April 21, 2025

In accordance with [SPE Memo 2025-01](#) (revised), the NOAA [Contract Obligation Approval Request Form](#) and [Grants Obligation Approval Request Form](#) are active and the sole points of entry for seeking obligation approval of covered actions. Important updates and notices regarding the approval process are detailed below:

1. Point of Contact

The point of contact identified in the approval request form does not need to be the actual individual submitting the form. It should be the person responsible for responding to any questions related to the submission in accordance with internal office procedures.

2. New Attachment B Template

For all new actions requiring Secretary of Commerce approval (those over \$100K), requestors must complete and upload Attachment B using the [new template](#) to the approval request form. An [example](#) is provided to show the information needed in each section of the new template.

3. Previously Submitted Obligation Approval Request Forms

For approval request forms submitted using a previous version of the template that are pending Secretary determination and approval, a revised Attachment B using the [new template](#) must be submitted. To submit a revision, complete the [Attachment B Replacement Form](#).

4. Meeting Review Requests for Actions Requiring Secretary Approval

Once the requester has submitted the approval request form with the revised template, the requesting office may follow the [established process](#) to schedule a recurring meeting with the NOAA leadership team to review Attachment B. Meetings may be scheduled on any weekday, [subject to availability](#). For emergencies, a meeting request can be made directly by emailing the NOAA leadership team.

5. Approval Determinations

Once senior leadership has made a final determination on the request, the individual who submitted the obligation approval request form will receive an email notification. This automated email notification will be sent from a [noreply@noaa.gov](mailto:noreply@noaa.gov) email address with a subject line that contains the obligation request number and one of three determinations:

- a. Approved - This email provides written certification that approval has been coordinated and granted at the appropriate level based on the established dollar

thresholds.

b. Rescope - This email provides a written determination that some aspect of the requirement must be rescope. Comments detailing necessary actions will be provided in column S of the [NOAA OR PL Approval Sheet](#). Due to restricted access to the spreadsheet, comments will need to be shared via interoffice communication.

c. Terminate - This email provides written notification that the request is disapproved and the action must be terminated in full.

If approval of the request is granted, the requirements office **must** upload a copy of the approval email to the PRISM workspace in order for AGO to process the requested action. At this time, AGO will not receive automated notifications of final determinations and it is the responsibility of the requisitioner to notify their Contracting Officer of the determination status of requirements. Access to the [NOAA OR PL Approval Sheet](#) is **limited within each line and staff office**. Line and staff office POCs should monitor the NOAA OR PL Approval (Contracts Tab) regularly to check on comments and updates on approvals.

Instructions for disapprovals, cancellations, and change requests (apart from uploading the revised Attachment B) related to a submission are included within the Obligation Approval Request Form.

Please note that NOAA leadership reserves the ability to revise Attachment B. Requesters should ensure that all actions taken after approval are aligned with the final approved documentation.

Review the [SPE Memo Frequently Asked Questions V4](#) and [NOAA Obligation Approval Process FAQs](#) for more information. Email questions about the obligation approval request form to AGO at [sda.ago@noaa.gov](mailto:sda.ago@noaa.gov). For all other questions about the obligation approval process, email the NOAA leadership team at [NOAA.Policy@noaa.gov](mailto:NOAA.Policy@noaa.gov).

**INFORMATION: NOAA Emergency Procurement Exemption Procedures**

1 message

AGO Policy - NOAA Service Account <ago.policy@noaa.gov>  
To: \_AGO Personnel <ago.personnel@noaa.gov>, \_OFAAMAC <amac@noaa.gov>

Mon, Aug 25, 2025 at 2:56 PM

**The following message is sent on behalf of Rafael Rivera, Acting AGO Director:****NOAA** NATIONAL OCEANIC AND  
ATMOSPHERIC ADMINISTRATION  
UNITED STATES DEPARTMENT OF COMMERCE

**MEMORANDUM FOR:** Deputy Assistant Administrators  
Staff Office Directors  
Chief Financial Officers  
Chiefs of Staff

**CC:** Acquisition and Grants Office Personnel  
Acquisition Management Advisory Council  
Deputy Undersecretary for Operations  
NOAA Policy Team

**FROM:** Rafael Rivera, Acting Director  
Acquisition and Grants Office

**SUBJECT:** INFORMATION - NOAA Emergency Procurement Exemption  
Procedures

**DATE:** August 25, 2025

This memorandum authorizes and provides procedures for contracting actions related to critical or emergency procurements less than \$100,000 that are exempt from Executive Order 14222 and SPE Memorandum 2025-01.

## Attachment

1. Request for an Exemption from Executive Order E.O. 14222 and Senior Procurement Executive (SPE) Memorandum 2025-01 for Mission-Critical Public Safety and Emergency Contracting Actions

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 **Emergency\_Procurement\_Exemption.pdf**  
241K



UNITED STATES DEPARTMENT OF COMMERCE  
Deputy Under Secretary for Operations  
National Oceanic and Atmospheric Administration  
Washington, D.C. 20230

Aug 12, 2025

MEMORANDUM FOR:

Laura Grimm  
Chief of Staff

(b) (6)

Performing the Duties of Under Secretary  
of Commerce for Oceans and Atmosphere  
and NOAA Administrator

(b) (6)

FROM:

Vice Admiral Nancy Hamm

Deputy Under Secretary for Operations, NOAA

SUBJECT:

Request for an Exemption from Executive Order E.O. 14222 and  
Senior Procurement Executive (SPE) Memorandum 2025-01 for  
Mission-Critical Public Safety and Emergency Contracting Actions

### 1. Purpose

This memorandum requests an exemption from the requirements of E.O. 14222 implemented through SPE Memorandum 2025-01 for contracting actions related to critical or emergency procurements. Granting this exemption will ensure NOAA's operational agility and its ability to respond rapidly to unforeseen events without unnecessary delays, thereby protecting public safety and mission integrity.

### 2. Background

E.O. 14222, issued on February 26, 2025, mandates enhanced oversight and approval processes for certain contracting actions. The intent of this order is to improve fiscal accountability and efficiency. However, the current approval process, when applied to emergency and time-sensitive contracting actions, introduces potential delays that could hinder the Agency's ability to fulfill its most critical responsibilities.

### 3. Proposed Exemption

I respectfully request that emergency contracting actions be exempted from the requirements of E.O. 14222 as implemented through SPE Memorandum 2025-01. Emergency actions include, but are not limited to, actions taken in response to a declared or immediate emergency that require a rapid procurement solution, actions necessary to prevent a significant disruption to mission-critical operations, or actions necessary to mitigate an imminent threat to a facility, life or property.



The determination of what constitutes "an emergency, or other critical or acute spending" is subjective but will be supported by a decision no lower than a Line Office Deputy Assistant Administrator or Staff Office Director, ensuring that all exempted actions remain subject to senior leadership's direct authorization. Examples include but are not limited to actions supporting an emergency declaration, severe weather events, and urgent facility repairs necessary to enable sustained operations.

#### **4. Justification**

The nature of our mission dictates that we must be able to act with speed and decisiveness. In an emergency, delays of even a few hours can have significant consequences for public safety and our operational effectiveness. Delayed approvals for contracts can result in operational risk to NOAA facilities and other assets, increase risk for public safety concerns, incur additional costs and overall risks to mission execution.

Granting this exemption will:

- **Ensure Operational Readiness:** It will empower contracting officers to quickly secure the necessary goods and services to address emergencies, crises, and critical operational needs.
- **Mitigate Risk:** By streamlining the process, we reduce the risk of a delayed response of a slow to an acute threat or public safety incident.
- **Maintain Fiscal Responsibility:** The exemption does not eliminate all oversight; it simply delegates the approval authority for these specific, time-sensitive actions to Line or Staff Office leadership, who are best positioned to make a rapid and informed decision.

#### **5. Process and Limitations**

In accordance with the exemption request outlined in Section 1, when an emergency situation arises, program offices shall follow the below procedures.

- Program offices shall seek concurrence of the emergency determination from their Line or Staff Office leadership (no lower than Deputy Assistant Administrator or Staff Office Director, or an individual in an acting capacity).
- Upon concurrence, provide the servicing Acquisition and Grants Office (AGO) all appropriate documentation, including the written approval, to execute the emergency contract action.
- AGO will follow internal procedures necessary to execute the emergency requirement.
- Within five business days of contract execution (including notices to proceed), complete the OR approval process to ensure proper tracking of the action. Included documentation shall include the approval by the Deputy Assistant Administrator or Staff Office Director attesting that the emergency declaration was appropriate. Email notification to the political leadership team summarizing the action is also required within this timeframe.
- This process is limited to actions less than \$100K.

## 6. Recommendation

I recommend that you approve this exemption to provide the necessary flexibility and efficiency for our contracting operations in emergency situations. This action will ensure that NOAA will continue to fulfill its mission effectively and without delay, even in the most challenging of circumstances.

### UNDER SECRETARY'S DECISION

(b) (6)

\_\_\_\_\_ I approve this request as requested.

\_\_\_\_\_ I disapprove this request as requested.

\_\_\_\_\_ I would like to discuss this issue.