




## **POLICY FLASH 2014-32**

**DATE:** June 17, 2014

**TO:** Procurement Directors/Contracting Officers

  
**FROM:** Director,  
Contract and Financial Assistance Policy Division  
Office of Acquisition and Project Management

**SUBJECT:** **General Accountability Office Report (GAO) final report entitled**  
*National Laboratories: DOE needs to Improve Oversight of Work*  
*performed for non-DOE Entities (GAO 14\_78 October 2013).*

Recommendation 1 of GAO Report 14-78 directs DOE to, “Ensure compliance with the requirements in the Work for Others order for project approval.” The basis for this recommendation was GAO’s assertion that during interviews with DOE officials, 8 of 17 Site Office officials stated that DOE often accepted laboratory (contractor) provided justifications and determinations without taking steps to independently verify them.

DOE Contracting Officers (COs) are reminded that DOE Order 481.1C, Work for Others (Non-DOE Funded Work) assigns decision responsibility for WFO project determinations and written certification to authorized DOE officials. DOE policy specifically prohibits delegation of these responsibilities to contractors. While GAO did not identify instances where determinations and CO written certifications/approvals did not occur or inappropriate projects were approved, statements made by DOE officials during audit interviews have raised concern regarding the adequacy of assessments by DOE officials.

DOE WFO policy requires specific information to be provided by non-DOE project sponsors and DOE contractors. However, it is the DOE COs responsibility to ensure independent final determinations and written

certifications are completed by DOE officials. COs are expected to ensure that adequate documentation exists to support these actions.

This Flash will be available online at the following website:  
<http://energy.gov/management/office-management/operational-management/procurement-and-acquisition/policy-flashes>. The GAO report can be found at the following site: <http://www.gao.gov/products/GAO-14-78>

Questions concerning this policy flash should be directed to Andrew Scott Geary, Office of Contract and Financial Assistance Policy in the Office of the Acquisition and Project management by phone at (202) 287-1507 or by email at [andrew.geary@hq.doe.gov](mailto:andrew.geary@hq.doe.gov)