



FINANCIAL ASSISTANCE MEMORANDUM 2025-02

ACTION

MEMORANDUM FOR: DEPARTMENT OF COMMERCE GRANTS COUNCIL

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

SUBJECT: Agency Review Policy for Department of Commerce Grant-Making Bureaus

1. **Purpose.** This memorandum provides policy guidance to Department of Commerce (DOC) Grants Officers when reinstating DOC financial assistance awards.
2. **Expiration date.** Until cancelled or superseded.
3. **Background.** On March 25, 2025, Executive Order 14249 (E.O.) titled Protecting America's Bank Account Against Fraud, Waste, and Abuse was issued. This E.O. states, "Financial fraud threatens the integrity of Federal programs and undermines trust in Government." To safeguard against this threat, increase transparency with how taxpayer dollars are used, and reduce the risk of financial fraud or other poor fiscal management practices by recipients, DOC has assumed a pro-active posture to ensure that all payments made under a reinstated financial assistance award are proper, accurate and sufficiently justified. Agency Review operationalizes this posture.
4. **Policy.** To mitigate risks to DOC and to ensure federal funds are paid in accordance with the terms of the award, all federal financial assistance recipients receiving notices of reinstatement must be put on Agency Review status for all payment drawdowns as a pro-active mitigation measure in order to reduce the risk of financial fraud or other poor fiscal management practices by recipients. This policy guidance shall be applied to all prior reinstatements during this calendar year and any future reinstatements. This policy guidance satisfies any internal bureau processes or requirements to request Agency Review for reinstated financial assistance awards.
5. **Contact.** Questions regarding this FAM may be directed to John Geisen at jgeisen@doc.gov.