



MEMORANDUM FOR: Bureau Chief Information Officers
Bureau Procurement Officials

FROM: André V. Mendes
Chief Information Officer

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Senior Procurement Executive
and Director of Acquisition Management

SUBJECT: IT Compliance in Acquisition Checklist Requirements:
Preparation for the Increased Micro-Purchase Threshold

This memorandum revises the Department's Chief Information Officer memorandum dated June 15, 2016 "IT Compliance in Acquisition Checklist Requirements," (ITC Memo).

A pending Federal Acquisition Regulation (FAR) revision implementing Section 806 of the National Defense Authorization Act for FY 2018, will increase the micro-purchase threshold (MPT) from \$3,500 to \$10,000. The pending increase to the micro-purchase threshold will offer more flexibility.

As we prepare for the MPT increase, the Department will continue to use the existing "IT Compliance in Acquisition Checklist" (Checklist) tool (attached) to help ensure that IT acquisitions receive the necessary reviews. Purchase card transactions below the MPT do not normally include terms and conditions. The use of the checklist for purchase card transactions is a way for Office of the Chief Information Officer offices to have insight into what is purchased on the purchase card. The Checklist is typically completed in coordination with members of the Acquisition team including: The Procurement Requestor, Contracting Officer Representative, IT Security Officer, and Contracting Officer..

Currently the Checklist must be completed for all IT Acquisitions. The ITC Memo dated June 15, 2016, provided additional flexibilities for Bureau Chief Information Officers (CIO) in their assessment of micro purchases. Moving forward, the Checklist must be used by all purchase card holders for any purchase that is valued above the \$3,500 threshold, to determine through their Bureau CIO's if the request falls with the definition of Information Technology. We will continue to utilize this method until the FAR is revised and new Department guidance is issued on the micro-purchase threshold, including use of the purchase card.

Effective May 18, 2020, the Checklist must continue to be used to support IT procurement requests with estimated values that exceed **\$3,500**. However, this guidance does not change

1 As defined in CITR-023: Pre-Acquisition Supply Chain Risk Assessment an information system is defined by the following characteristic: (1) that the Department designates as FIPS 199 high-impact or moderate-impact system. (2) that is subject to the reporting requirements of 44 U.S. C. Section 3505(c) FISMA Reportable System; and (3) for which a new system inventory record will be created and entered into the CSAM in accordance with CITR-019 Risk Management Framework (RMF).

requirements pertaining to National Security systems; all National Security IT purchases must utilize the Checklist.

Bureau CIOs shall implement a process that includes their review of IT procurement requests with estimated values at or below the \$3,500 threshold. Documentation providing details on your process for reviewing IT procurement requests should be sent to the DOC FITARA Program Office at DOCFITARA@doc.gov no later than 60 days from the date of this memo.

All requirements that meet the definition of an "information system" shall continue to utilize the Checklist, while those that do not meet the definition can proceed without a Checklist. This memo provides Bureau CIO's flexibility in determining the application of the Checklist for actions at or below the \$3,500 threshold that do not meet the definition of an information system.

Thank you for your attention to this matter, as the Department strives to support a service-oriented culture that responds to the needs of the external and internal customers.

Attachment