PROCUREMENT MEMORANDUM 2018-01

ACTION

MEMORANDUM FOR: Senior Bureau Procurement Officials
Heads of Contracting Offices

FROM: Barry E. Berkowitz
Senior Procurement Executive
and Director for Acquisition Management

SUBJECT: Annual Oversight of Contract Writing System User Accounts

Background

The Government Accountability Office’s (GAO) Standards for Internal Control in the Federal Government states that documentation is a necessary part of an effective internal control system and that appropriate segregation of duties helps prevent fraud, waste, and abuse. Additionally, NIST Special Publication 800-53, Rev.4, Security and Privacy Controls for Federal Information Systems and Organizations, AC-2 Account Management, states that the organization creates, enables, modifies, disables, and removes information system accounts in accordance with agency policies and reviews accounts for compliance with account management requirements. Therefore, Procurement Memorandum 2017-03, issued June 20, 2017, established separation of duties between user roles utilized by the Department of Commerce (DOC).

Purpose

To further enhance internal controls, this memorandum implements the requirement to perform an annual review of DOC contract writing system accounts to confirm that users still require access to, and to maintain appropriate levels of access within, the system.

Policy

In accordance with the DOC’s Functional Change Control and Data Standardization Board, bureaus are responsible for determining user access roles within their contract writing system. These roles will be defined in each bureau’s User Access Form. Organizational management is responsible for notifying System Administrators when a user’s role or access has changed or is no longer needed. Each bureau shall complete an annual review of all user accounts to ensure that user access has been appropriately obtained and managed.
Required Actions

Bureau Procurement Officials (BPOs) shall confirm compliance with this Procurement Memorandum within 30 days of issuance by providing a copy of their process for performing annual reviews of user accounts to OAM_Mailbox@doc.gov.

On or before December 1 of each year, the BPOs shall execute their processes for performing annual reviews of user accounts and confirm compliance with this Procurement Memorandum by providing updated copies of their processes for performing annual reviews of user accounts to OAM_Mailbox@doc.gov.

Effective Date

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

Please direct any question regarding this Procurement Memorandum to Tom Cochran at tcochran@doc.gov or 202-482-4424.