

## 12-4. Personnel Responsibilities for ETOs

### a. HCA Responsibilities

- 1) HCAs have the delegated authority to authorize most EAFs. No notification from DPCAP is necessary for HCAs to implement these flexibilities. See DPCAP memorandum “ [Emergency Acquisition Flexibilities - Special Emergency Procurement Authority and Head of the Contracting Activity Delegated Authority](#),” dated October 2, 2020, for guidance on how to determine if it is appropriate to authorize the use of EAFs.
- 2) To meet the requirements of the FAR 2.101 micro-purchase definition, ensure guidance directs CHs to retain ETO determinations to use elevated acquisition thresholds in their purchase file.
- 3) Ensure compliance with the required ETO internal controls.
- 4) Ensure guidance requires supplemental oversight for all accounts with elevated spending limits.

### b. A/OPC Responsibilities

- 1) Distribute policy and guidance with respect to use of the GPC for each ETO.
- 2) Manage delegations of procurement authority for designated ETO card accounts.
- 3) Raise monthly and single transaction limits only when ETOs are being supported. There will be no blanket increase of these CH authorities.
- 4) Comply with DoD Purchase Log Information policy to ensure the identification and capture of all ETO GPC purchases (transactions and dollars).
- 5) Develop and implement a supplemental oversight program for all accounts with elevated spending limits.
- 6) Perform IOD case reviews for all ETO transactions above \$10,000.

### c. RM Responsibilities

- 1) Develop unique LOAs (alternate or default) as required, to be used only when GPC purchases are made in support of each ETO.
- 2) Assist in identifying and tracking all ETO transactions.
- 3) Notify the A/OPC of fund availability.
- 4) Update CH limits (e.g., cycle limits) as needed.

### d. Billing Official Responsibilities

- 1) Verify proper documentation is recorded and maintained for ETO transactions.
- 2) Ensure CH compliance with all statutory and regulatory guidance regarding ETOs.

- 3) Confirm CHs properly identify and record ETO transactions in the bank's EAS.
- 4) Ensure CHs use the correct LOA, as required, for ETO transactions.
- 5) Ensure ETO convenience checks do not exceed either the MPT authorized for convenience checks or the CH's authorized single purchase and other account spending limits. Verify the vendor was unable to accept the GPC.
- 6) Ensure all open-market transactions (i.e., those not placed under existing contracts) that exceed the increased MPTs are performed by a Contracting Officer. All ETO efforts conducted in accordance with [FAR 13.201\(g\)](#) can be undertaken only by a Contracting Officer.

**e. CH and Convenience Check Account Holder Responsibilities**

- 1) Identify all ETO transactions in the bank's EAS.
- 2) Ensure the requiring activity's PR&A details how the transaction supports the ETO.
- 3) Ensure each GPC transaction is charged to the LOA specifically established for that ETO.
- 4) Ensure convenience checks remain a purchase instrument of last resort.

**Parent topic:** [CHAPTER 12 - EMERGENCY TYPE OPERATIONS](#)