



# Federal Aviation Administration

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## Memorandum

Date: March 24, 2014

To: Center Management Team

From: *Susan L. Whittington*  
Susan L. Whittington, Manager, Aeronautical Center Acquisition Services, AAQ-700

Subject: FY14 End of Year (EOY) and FY15 Start-Up Guidance and Timelines

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The guidelines and timelines provided below are based on an assumed last day of obligation in the PRISM system of September 26, 2014. That date is subject to change once definitive guidance is received from HQs. Please ensure that any anticipated unfunded requirements are in AAQ-700 (formerly AMQ) by May 30, 2014 (over \$100K) and June 27, 2014 (under \$100K), marked "Subject to the Availability of Funds" to ensure that we are in a position to obligate dollars timely in the event they become available. The remainder of this memo is the standard year-end guidance.

We have a very high volume of recurring services that will continue into FY15 or begin in FY15, so I need to provide a reminder on the Antideficiency Act. Obligations or expenditures for services to continue or begin in advance of FY15 appropriations are prohibited by the Antideficiency Act [31 U.S.C. 1341]. Allowing contractors to continue or to begin performance without a certification of funds availability, even after an appropriation has been approved by Congress, puts the Agency and/or the individual FAA employee at risk of violating the Antideficiency Act. AAQ-700 contracting officers cannot and will not give verbal direction to contractors to proceed without the appropriate inputs from the users of those services.

To ensure an orderly close out of the current FY, and to adequately plan for services beginning the new FY, the following timelines are provided:

### **New contracts to be awarded in FY14 with start dates in FY14:**

Over \$100K: If the PR (to include a complete and accurate requirements package) is not in AAQ-700 by May 30, 2014, then your requirement is potentially at risk. In addition, requirements greater than \$5M that are to be awarded in FY14, not already in AAQ-700, are in jeopardy. Requiring Organizations (RO) can contact either John Hawk (AAQ-720 customers, formerly AMQ-200) at x48321 or Suzanne Easter (AAQ-730 customers, formerly AMQ-300) at x47822 to discuss your individual circumstances for more definitive guidance.

Under \$100K: The approved PR should be in AMQ, with certified funds, not later than June 27, 2014.

Obligations/Deobligations on awarded contracts that need to be completed in FY14:  
Approved PRs need to be in AAQ-700 not later than **August 29, 2014**.

To ensure an orderly startup of new FY15 requirements or recurring services, the following timelines are provided:

**New contracts to be awarded in FY14 with start dates in FY15:**

Over \$100K: For October 1, 2014, start dates, if the PR (to include complete and accurate requirements package) is not in AAQ-700 by May 30, 2014, then your requirement is potentially at risk. Please ensure all FY15 start date PRs are appropriately marked "Subject to the Availability of Funds". In addition, requirements greater than \$5M that are to be awarded in FY15 with October 1, 2014 start dates, not already in AAQ-700, are in jeopardy. ROs can contact either John Hawk (AAQ-720 customers, formerly AMQ-200) at x48321 or Suzanne Easter (AAQ-730 customers, formerly AMQ-300) at x47822 to discuss your individual circumstances for more definitive guidance. Note: Due to competing EOY priorities, these PRs will have a lower priority than those with a start date in FY14.

Under \$100K: The approved PR should be in AAQ-700, marked "Subject to the Availability of Funds", not later than June 27, 2014. Note: Due to competing EOY priorities, these PRs will have a lower priority than those with a start date in FY14.

**Note:** Recurring services (such as software licenses, subscriptions, printers, etc.) that require award of a new contract, issuance of a purchase order or order against a GSA schedule must be received by June 13, 2014, to allow for sufficient lead time given the volume of these requirements. Failure to provide a PR by that date may result in a break in maintenance services. **Recurring services shall not be continued by the use of the purchase card unless authorized in accordance with AMS T3.2.6.A.1.j. – check with Suzanne Easter or John Hawk for additional guidance.** In instances where recurring services are permitted to continue without contractual coverage and with the knowledge of the customer, an unauthorized commitment will have occurred.

**Unauthorized Commitments:** Only contracting officers and other designated employees acting within the scope of their authority may enter into contracts or other agreements and expend funds on behalf of the government. An agreement that is entered into by an FAA employee who does not have the authority to enter into agreements on behalf of the FAA is an unauthorized commitment. Unauthorized commitments are a serious violation of fiscal law and statutes. Persons who enter into unauthorized commitments will be held accountable. Managers shall make every effort to prevent unauthorized commitments and must consider whether discipline is appropriate for an employee who enters into an unauthorized commitment regardless of whether the procurement action is later ratified.

**Obligations on awarded contracts with a start date in FY15, to include recurring services:**

Approved PRs, marked "Subject to the Availability of Funds", need to be in AAQ-700 not later than June 13, 2014.

**The following exceptions to the above timelines are provided.** Any other exceptions require Program Director coordination with AMB-1 or appropriate budget office coordination.

1. AML PRs that are processed by acquisition personnel in TSF will continue to be processed through September 26, 2014.
2. Aircraft on the Ground (AOGs) and Facilities Off-the-Air (FOAs) PRs, with certification from AJW-3 or AML-1, will continue to be processed through September 30, 2014.