



**Department of Energy**  
Washington, DC 20585

February 7, 2025

MEMORANDUM FOR DISTRIBUTION

FROM: CHRISTOPHER S. JOHNS *CSJ*  
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OFFICE OF THE CHIEF FINANCIAL OFFICER

SUBJECT: Financial Implementing Guidance for Administration Direction

This memorandum communicates guidance received by the Office of the CFO regarding the financial implementation of the Administration direction provided in the Acting Secretarial Memorandum, "Agency-wide Review of Program and Administrative Activities," issued on January 20, 2025 (January 20 Memo). The financial implementing guidance reflects current requirements of the Acting Secretarial Memorandum and follows District Court Orders issued regarding handling of awards and obligations.

Consistent with the requirements of the January 20 Memo, actions taken by DOE during the transition period are to be reviewed to ensure that DOE initiatives are in line with the statutory mission of DOE. Therefore, financial transactions using IIJA and IRA funds and new awards using base funds must be reviewed and approved by DOE policy officials.

OCFO has developed an internal DOE workflow process to facilitate review of actions by the appropriate Administration Designee. The Administration Designee is the Senior political appointee assigned to a Departmental Element. If no appointee is assigned to a Departmental Element, the Administration Designee is the Acting Under Secretary. For Departmental Elements reporting directly to the Deputy Secretary that do not have an assigned political appointee, the Administration Designee is the Chief of Staff or his designee. For questions regarding the workflow process, please contact Tom Fields, Deputy Director for Strategic Resources, at [tom.fields@hq.doe.gov](mailto:tom.fields@hq.doe.gov) or by Teams.

Detailed financial implementing guidance will be distributed to the DOE financial management community and will be updated as needed. This memorandum expires 90 days from issuance, or when otherwise amended or cancelled.

**Frequently Asked Questions on the Financial Implementation Guidance  
based on the February 7, 2025, Memo from Christopher Johns**

**February 12, 2025**

<b>Topic</b>	<b>Question</b>	<b>Answer</b>
<b>Payments to Site/Facility Management Contracts</b>	What is the process for obtaining review of payments to site/facility management contractors?	As specified in the financial implementation guidance, <u>no review is needed</u> beyond normal procedures. Contractors can continue to draw down funding through ASAP.
<b>Obligations to Site/Facility Management Contracts</b>	What is the process for obligating IRA/IIJA funds on a site/facility management contract?	The office to which the funding was allotted (funding office) must request review of the proposed obligation before processing a preallocation in BFADS. So the request for review is made by the funding office and approved actions are processed using normal procedures.
<b>Separate Approval for Obligation and Payments</b>	When an obligation of IRA/IIJA appropriations is approved, is separate approval required for subsequent payments/disbursements?	No. Approval of the obligation also provides approval of any related subsequent payments/disbursements.
<b>Incremental Funding</b>	Is approval needed for incremental funding of current awards?	Yes. Incremental funding involves the obligation of additional funds on an existing award. Approval of new obligations is required by the Acting Secretary Memorandum, as described in the financial implementation guidance.
<b>Workflow</b>	How do I determine who our Administration Designee is?	<p>Senior staff appointments announced as of February 6<sup>th</sup> are posted <a href="#">here</a>. Additional appointments have been made since February 6<sup>th</sup>. If your office does not have a senior staff appointment, consult your Head of Departmental Element, and then follow the guidance contained in the memo:</p> <p><i>If no appointee is assigned to a Departmental Element, the Administration Designee is the Acting Under Secretary. For Departmental Elements reporting directly to the Deputy Secretary that do not have an assigned political appointee, the Administration Designee is the Chief of Staff or his designee</i></p>

<b>Topic</b>	<b>Question</b>	<b>Answer</b>
<b>Workflow</b>	Please explain the workflow process.	<ol style="list-style-type: none"> <li>1. A program office enters data into the tool and then promotes that in the system.</li> <li>2. An Administration Designee will review that request. That person may approve, reject, request more information, or request higher level review. That will then be routed accordingly: <ol style="list-style-type: none"> <li>a. Approvals: <ol style="list-style-type: none"> <li>i. If a FAST Disbursement is approved, it goes to CF who will release, batch, and pay the approved invoice(s).</li> <li>ii. If an ASAP Disbursement is approved, it routes to the appropriate field office so that the field office can approve the drawdown request in ASAP.</li> <li>iii. If an obligation request is approved, it will route back to the requesting program office to award/obligate funds.</li> </ol> </li> <li>b. Rejections: If rejected, the action goes to GC for further review and Programs &amp; OCFO for awareness.</li> <li>c. More Information: If more information is requested, the item is routed back to the originator to provide more information.</li> <li>d. Higher Level-Review: If higher level review is requested, the item is routed to MA-1 for review and potentially then for review by the CoS.</li> </ol> </li> </ol>
<b>Workflow</b>	Do transactions already approved by the Secretary need to be entered into the Workflow?	No. Transactions already approved can be processed with accompanying support. However, it is recommended the approval be added to the tool through the form "Preapproved Obligations and Disbursements".
<b>SBIR/STTR Awards</b>	Which office should request approval for SBIR/STTR awards using transferred IIJA/IRA funding?	The Office of Science

<b>Topic</b>	<b>Question</b>	<b>Answer</b>
<b>Workflow—Invoice Payments</b>	How is approval handled for invoice payments utilizing IRA/IIJA appropriated funding through FAST?	<p>FAST bills should be approved for payment by the proper invoice approvers following normal procedures. The Payment Services team will then populate the approval templates submit them through the workflow for administration designee approval. The workflow is set up to send notifications back to the Payment Services team upon approval to release the holds and make the payments.</p> <p>Invoice approvers should continue to review and approve invoice payments according to normal procedures. If the invoice has not been approved by the invoice approver, then the Payment Services Team will not have it on the list to request approval for payment.</p>
<b>Non-Federal SPP &amp; Reimbursable Work</b>	For non-Federal SPP or other non-Federal reimbursable work, is approval needed for each agreement, or for each monthly invoice?	Approval is needed for each agreement. Customers should be invoiced for approved work according to normal procedures.
<b>Working Capital Fund</b>	Do individual WCF business lines need to obtain approval to make a WCF-funded contract or interagency agreement award?	No. Contributions of IIJA/IRA appropriations to the fund by DOE programs must be reviewed. Any subsequent actions, including contract actions and interagency agreements, do not require review.
<b>EITS Contributions and Operations</b>	Is approval needed for contributions to CIO for EITS? Does CIO need approval for actions relating to EITS operations?	<p>Follow the same processes defined for the working capital fund:</p> <ul style="list-style-type: none"> <li>• No review is needed for program contributions using funding other than IRA/IIJA appropriated funding</li> <li>• Any program contributions to CIO using IRA/IIJA appropriated funding must be reviewed through the workflow</li> <li>• Any subsequent obligations/payments by CIO do not require review or approval</li> </ul>