

## WAIVER FROM SEPARATION OF DUTIES

**1. REASON FOR ISSUE:** This directive establishes specific VA policy for waivers in the current Separation of Duties policy when obligating and disbursing funds in the Financial Management System (FMS) as stated in VA MP-4, part V, and VA Directive 4000.

**2. SUMMARY OF CONTENTS/MAJOR CHANGES:** This directive provides VA policy for requesting and approving a waiver from the Separation of Duties policy when obligating and disbursing funds in the Financial Management System (FMS).

**3. RESPONSIBLE OFFICES:** Offices responsible for the material contained in this directive include the Financial Management System Service (FMS) (047E7), Office of the Deputy Assistant Secretary for Finance (047); Office of the Chief Financial Officer for the Veterans Health Administration (VHA) (17); and Office of the Chief Financial Officer for the Veterans Benefits Administration (VBA) (24).

**4. RESCISSIONS:** None.

**CERTIFIED BY:**

**BY DIRECTION OF THE SECRETARY  
OF VETERANS AFFAIRS:**

/s/

Robert N. McFarland  
Assistant Secretary for  
Information and Technology

/s/

Tim S. McClain  
Chief Management Officer

Distribution: Electronic Only



## WAIVER FROM SEPARATION OF DUTIES

**1. PURPOSE.** The Office of Management and Budget Circular A-123, the Federal Managers' Financial Integrity Act (FMFIA) of 1982, and other standard governmental financial guidelines require a separation of the functional duties of initiating, recording, reviewing, and approving financial transactions. This directive provides VA policy for requesting and approving exemptions (waivers) from VA's Separation of Duties policy when obligating and disbursing funds in the Financial Management System (FMS).

### 2. POLICY

a. A waiver request will be considered when the station has no more than three staff with any kind of data entry access in FMS. The field station Director/Fiscal Officer must sign a written justification for the waiver and forward it to the Administration CFO for approval. Any additional staff over the three-member threshold will automatically rescind all current waiver access at the station.

b. A waiver from the Separation of Duties policy can only be granted by the Administration CFO.

c. The Administration CFO or designee has the discretion to exceed the maximum number of waiver accesses at any given station. The Administration CFO or designee will adjudicate the request on a case-by-case basis depending upon the justification provided.

d. The FMS Security Officer will implement the written decision provided by the Administration CFO or designee.

### 3. RESPONSIBILITIES.

a. **Deputy Assistant Secretary for Finance.** The Deputy Assistant Secretary for Finance will ensure proper administration of this policy and related waiver requests.

b. **Administration CFO/CFO designee.** The Administration CFO/designee will:

(1) Review the request for waiver and make a prompt decision based upon the merits of the justification.

(2) Provide a formal response to the station on their decision.

(3) Provide the FMS Security Officer (SO) with written instructions on what action to take concerning the waiver request.

(4) Annually review and certify all data entry access for stations in their Administration and provide written certification of appropriateness of access to the FMS SO.

c. **Field Station Director/Fiscal Officer.** The Field Station Director/Fiscal Officer will:

(1) Request a waiver in writing and forward it to the Administration CFO/designee. The request must justify the need for the waiver.

(2) Annually review and certify all data entry access for their station and provide written certification of appropriateness of access to the Administration CFO/designee.

d. **Security Officer, Financial Management System (FMS) Service (047E7).** The Security Officer, FMS Service (047E7) will:

(1) At regularly scheduled intervals, or as requested by field station director/fiscal officer, provide the Administration CFO with a complete listing of all stations with FMS access to assist in the decision-making process.

(2) Implement the written decision provided by the Administration CFO or designee on waiver requests.

(3) Provide the Field Station Director/Fiscal Officer with a complete list of station FMS access on demand.

#### 4. REFERENCES

a. VA Directive 4000, 2.c, "Prohibited Dual Functions."

b. VA Manual MP-4, Part V, 1A.10.b. "Control Through Assignment of Duties of Employees."

#### 5. DEFINITIONS

a. **Data entry access.** The ability to create any FMS payment or obligation document.

b. **FMS.** The Financial Management System, VA's core accounting system of record, maintained by the Financial Management System Service (047E7).

c. **Waiver access.** The authorization provided to fiscal personnel to both obligate documents and make payments against those obligations.