

INDIAN AFFAIRS MANUAL

Part 22

Acquisition Management

Chapter 5

Contract Files and Reviews

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1.1 Purpose. This chapter establishes Indian Affairs' (IA) policy and procedures for creating a contract file and conducting periodic reviews.

1.2 Scope. This policy applies to all programs and offices under the authority of the Assistant Secretary – Indian Affairs (AS-IA), including the programs and offices under the AS-IA, the Bureau of Indian Affairs (BIA), Bureau of Indian Education (BIE), Bureau of Trust Funds Administration (BTFA), and all procurements awarded or funded by these offices.

1.3 Policy. It is IA's policy to create, update and retain an electronic contract file for all acquisition actions and to conduct periodic internal control reviews to ensure compliance with all applicable federal laws, regulations, and Departmental policies and procedures regarding contract files and reviews.

1.4 Authority.

A. Statutes and Regulations.

- 1) 48 CFR 1, Federal Acquisition Regulation (FAR)
- 2) 48 CFR 1400, Department of the Interior (DOI) Acquisition Regulation
- 3) FAR 4.101, Contract files
- 4) FAR 4.309, Storage, handling, and contract files

B. Guidance.

- 1) DOI Acquisition, Arts, and Assets Policy (DOI-AAAP)-0046, Electronic Contract Files

1.5 Responsibilities.

A. Bureau Procurement Executive (BPE) is IA's Chief Financial Officer (CFO) and responsible for overseeing IA's acquisition program, and ensuring:

- 1) programs have the resources, procedures, and tools necessary for all phases of the acquisition lifecycle;
- 2) compliance with applicable laws, regulations, policies, and procedures; and
- 3) record-keeping requirements are established and maintained.

B. Head of the Contracting Activity (HCA) is responsible for managing the contracting activity; establishing procedures for file storage; coordinating and overseeing reviews;

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and reviewing results and establishing corrective action plans, as necessary.

- C. **Contracting Officer (CO)** is the individual with the authority and responsibility for awarding, administering, and closing out contracts; maintaining complete and accurate contract files; and responding to reviews and data calls related to contract files.
- D. **Contract Specialist (CS)** is responsible for assisting the CO in awarding, administering, and closing out contracts; and assisting COs in maintaining complete and accurate contract files.

1.6 Definitions.

- A. **IA Contracting Activity** is defined as an office with delegated procurement authority. For IA, Contracting Activity includes all contracting offices under the authority of the AS-IA, including AS-IA offices, BIA, BIE, and BTFA. The Contracting Activity includes IA's Procurement Program, Government Purchase Card Program, and 2 CFR 200 Financial Assistance Program.
- B. **IA Contracting Offices** are defined as a subcomponent of the IA Contracting Activity that have responsibility for awarding and/or administering contracts at the office, bureau, or regional level.
- C. **xECM** is defined as the Financial and Business Management System (FBMS) Extended Enterprise Content Management (xECM) acquisition electronic contract system. It is the only accepted method for maintaining the official contract file in DOI.

1.7 Standards, Requirements, and Procedures.

A. Use of IA Acquisition Shared Drive.

- 1) COs and CSs must maintain complete, individual contract pre-award files in the designated acquisition shared drive until the contract is awarded. All drafted documentation associated with the contract file must be maintained in this folder. Upon award, all final documentation associated with the contract file must be uploaded into xECM within the required timeframe outlined in section 1.7 B of this policy. After award, COs and CSs must continue to maintain the shared drive file for all post-award activities and upload final documents to xECM upon release of a modification or when otherwise necessary to ensure the xECM file remains complete.
- 2) Employees may temporarily use local desktops for working materials during the business day only; however, by close of business each day, all official working files

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must be maintained in the designated acquisition shared drive. This ensures required availability, continuity, and record integrity.

B. xECM FBMS Attachment Workspace (e-filing).

- 1) The CO or CS must upload the complete, individual contract file in xECM within five (5) business days of contract award. This includes complete contract modification package into xECM within five (5) business days of modification execution.
- 2) COs and CSs must utilize DOI e-filing naming conventions throughout the acquisition process to ensure consistency and expedite e-filing, once awarded. The DOI Naming Convention template can be found in DOI-AAAP-0046.
- 3) Only the most current version of a document should be uploaded to xECM. There should be no duplicate or missing documents in the xECM contract file.

1.8 Contract File Reviews.

- A. The IA Division of Acquisition Management conducts annual contract file reviews in accordance with DOI Acquisition Management Review (AMR) policy and procedures. AMRs are conducted to assess the completeness, accuracy, and compliance of contract files. These reviews evaluate whether required acquisition documentation is present, properly approved, and aligned with federal, departmental, and bureau standards. AMRs identify trends, risks, and deficiencies across the acquisition lifecycle – pre-solicitation, pre-award, award, and post-award – and support continuous improvement by informing training priorities and corrective actions.
- B. The IA Division of Acquisition Management may conduct additional ad hoc reviews, including but not limited to e-file compliance reviews, Buy Indian Act compliance reviews, and other reviews necessary to address audit findings, emerging risks, or internal control requirements.

Approval

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Jason M. Bruno
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Date