

WAIVER FROM SEPARATION OF DUTIES

1. PURPOSE: This Veterans Health Administration (VHA) Directive provides policy for requesting and approving exemptions from prohibited dual functions of fiscal personnel.

2. BACKGROUND

a. The VHA Chief Financial Officer (CFO), or designee, has the discretion to exceed the maximum number of waiver accesses at any given station. The VHA CFO, or designee, must adjudicate the request on a case-by-case basis depending upon the justification provided. A waiver request can only be considered if a station has no more than three staff members with any profile of data entry access in a financial system of record. **NOTE:** *Any additional staff with any profile of data entry access will automatically rescind all current waiver access at the station.*

b. The System Security Officer, or designee, who manages data access to the financial system of record implements the written decision provided by the VHA CFO or designee.

c. The term financial systems of record is any Department of Veterans Affairs (VA) core accounting system such as: Financial Management System (FMS); Integrated Funds Distribution, Control Point Activity, Accounting and Procurement (IFCAP); or any new financial and/or logistical system.

d. Data entry access is the ability to create any document or transaction.

3. POLICY: It is VHA policy that a waiver for the separation of duties for any VHA fiscal personnel can be granted only if a justification for the waiver is received from the Veterans Integrated Service Network (VISN) CFO requesting the fiscal personnel be allowed to perform dual functions.

4. ACTION

a. **VISN CFO.** The VISN CFO, or designee, is responsible for:

(1) Signing a written justification for each waiver request and forwarding it electronically to the VHA Accounting Policy (173A) mailbox. It must have "Request for Separation of Duties Waiver" in the subject line, and be sent for review and analysis to the attention of the Accounting Policy Supervisor (173A2).

(2) Seeking methods to correct any separation of duty deficiency; seeking waivers, if appropriate; and establishing internal controls to make sure that the separation of duty deficiency has not resulted in a loss to the government.

THIS VHA DIRECTIVE EXPIRES OCTOBER 31, 2009

VHA DIRECTIVE 2004-056

October 7, 2004

(3) Requesting a waiver in memorandum format (see Attachment A) and sending the memorandum electronically to the VHA Accounting Policy (173A) mailbox. It must have "Request for Separation of Duties Waiver" in the subject line and be sent for review and analysis to the attention of the Accounting Policy Supervisor (173A2). **NOTE:** *This request must effectively justify the need for the waiver and provide assurance that processes are in place to ensure the waiver does not result in a loss to the government.*

(4) Keeping all facility approvals on file based on the VA's Records Control Schedule 10-1 pertaining to Audit Case File disposition found under Item No. 39.

(5) Annually reviewing and certifying all data entry access for the facility and providing written certification of appropriateness of access to the VHA CFO Accounting Policy (173A2) supervisor no later than July 31 each year.

b. **VHA CFO Accounting Policy Supervisor or Designee.** The Accounting Policy supervisor, or designee, is responsible for:

(1) Reviewing the waiver request of any station, making a recommendation, and sending it to the Director, Accounting and Financial Management (173A).

(2) Providing an electronic response to the station based upon the approval and/or disapproval of the waiver request, followed by a confirming memorandum signed by the Director, Accounting and Financial Management (173A), or designee.

(3) Providing the System Security Officer with written instructions on what action to take concerning the waiver request.

(4) Annually reviewing and certifying all data entry access profiles for VHA facilities and providing written certification of appropriateness of access to the System Security Officer by August 31. **NOTE:** *Any station that is not in compliance with this policy will have their waiver access revoked.*

c. **System Security Officer.** The System Security Officer is responsible for:

(1) Providing the VISN CFO, or designee, with a current listing of the station FMS entry access profile to assist in determining whether a waiver request is appropriate.

(2) Providing the VHA Accounting Policy Section with a current listing of the station's data entry access profile to assist in the waiver request decision.

(3) Implementing the written decision provided by the Director, Accounting and Financial Management (173A), or designee.

5. REFERENCES

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

b. VA Manual MP-4, Part V, “Control through Assignment of Duties of Employees.”

c. VA Manual MP-4, Part XI, “Internal Control Procedures.”

6. FOLLOW-UP RESPONSIBILITY: The VHA Chief Financial Officer (17) is responsible for the material contained in this Directive. Questions may be directed to 202-273-8340.

7. RESCISSIONS: None. This VHA Directive expires October 31, 2009.

Jonathan B. Perlin, MD, PhD, MSHA, FACP
Acting Under Secretary for Health

Attachment

DISTRIBUTION: CO: E-mailed 10/08/04
FLD: VISN, MA, DO, OC, OCRO, and 200 – E-mailed 10/08/04

ATTACHMENT A

SAMPLE FORMAT FOR WAIVER FROM SEPARATION OF DUTIES

DATE:

FROM: VISN __ CFO, VAMC XXX

SUBJ: Request for Separation of Duties Waiver for (list financial system of record)

TO: VHA Chief Financial Officer (17)
Attention: Director, Accounting and Financial Management (173A)

1. In accordance with VHA Directive 2004-XXXX, Waiver From Separation of Duties, the VA Medical Center requests that the following employee(s) be granted a waiver in order to perform (obligation and disbursing functions, authorizing purchase card transactions and making purchases, etc.). **NOTE:** *Explicitly, this means that this needs to contain a list of all financial systems to which this waiver is applicable.*

<u>Name</u>	<u>Title</u>	<u>User ID</u>	<u>Current Task</u>	<u>New Task</u>
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2. The justification for this request is based upon the following: (list justifications).

(Name and Signature of VISN __ CFO)