

12-3. Required Internal Controls for ETOs

- a. In anticipation of ETOs, the Army will identify, train, and appoint individuals in JAM with the Micro-Purchase ETO CH and/or Check Writer, or Warranted Overseas ETO CH, designation. Monthly and single transaction limits should be raised when ETOs are being supported. There will be no blanket increase of these CH authorities.
- b. The HCA determines whether an event/mission is considered an ETO. The requiring activity identifies each transaction that is in support of an ETO in the PR&A. The BO approves the request and confirms whether it is in support of a particular ETO and therefore allowable under the related regulation. The CH will identify the transaction as “In support of an ETO” in the bank’s EAS.
- c. All open-market transactions (i.e., those not placed under existing contracts) that exceed the increased MPTs must be performed by a Contracting Officer. All ETOs conducted in accordance with DFARS 213.201(g) can be undertaken only by a Contracting Officer.
- d. **Follow-up Reviews.** Contracting commands must designate officials (e.g., Level 3 or 4 A/OPC) to conduct follow-up reviews of transactions in support of each ETO. These follow-up reviews should take place as soon as practicable, but no later than 60 days after any given transaction. The officials will evaluate whether the transaction demonstrated the following:
- 1) Consistent with Army policies and procedures and otherwise reasonable and appropriate,
 - 2) Provided the maximum practicable opportunity for small business participation under the circumstances, and
 - 3) Appropriately documented by the CH.

Parent topic: [CHAPTER 12 - EMERGENCY TYPE OPERATIONS](#)