



ACQUISITION POLICY NOTICE

2022-03

October 29, 2021

Acquisition Policy Oversight

Whistleblower Information Distribution Verification

Background

The Department has developed a Robotic Process Automation (RPA) Bot capability that assists with the Whistleblower Information Distribution verification activities described in Acquisition Policy Notice (APN) [21-06](#). The Bot will be released in the Unified Financial Management System (UFMS) on November 1, 2021. APN 21-06 established a Department-level clause which requires contractors and subcontractors to distribute the [Whistleblower Information for Employees of DOJ Contractors, Subcontractors, Grantees, or Sub-Grantees or Personal Services Contractors](#) document to their employees performing work in support of the products and services delivered under the contract. By agreeing to the terms and conditions of the contract, the prime contractor acknowledges receipt of this requirement, in accordance with 41 U.S.C. § 4712 and FAR 3.908 & 52.203-17, and commits to distribution. Within 45 days of award, the contractor must provide confirmation to the contracting officer verifying that it has distributed the whistleblower information, as required.

Whistleblower Clause Bot Process

Step 1: The Bot identifies a new contract/order transaction in UFMS equal to or more than \$250K.

Step 2: The Bot sends an email notification to the vendor stating they have 45 days to certify that they have delivered the whistleblower information to every employee and posted it in public places, as required. The email notification includes an "I Certify" hyperlink the vendor can click on to provide verification of distribution to the contracting officer/contract specialist (CO/CS).

Step 3: The Bot checks the RPA shared mailbox for the certification message generated by the "I Certify" action completed by the vendor.

Step 4: The Bot forwards the email certification confirmation to the CO/CS and vendor.

Step 5: The Bot populates the Whistleblower Log database with updated Whistleblower Clause compliance data.

Step 6: The Bot sends a Whistleblower Report email, which includes the Whistleblower Log, to all approved DOJ Security Organization recipients associated with the contract/order.

Whistleblower Clause Bot Schedule

The unattended Bot checks UFMS for new UFMS contract/order transactions equal to or more than \$250K every Monday at 6AM EDT, and then sends the Whistleblower Report email to the approved DOJ Security Organization.

The unattended Bot checks the UFMS RPA Whistleblower Clause Mailbox for vendor certification emails every 60 minutes from 8AM – 6PM EDT on every business day (Monday-Friday).

Whistleblower Log

The Bot will populate the Whistleblower Log table with the following data:

- Vendor Name (Populated from UFMS)
- PIID (Populated from UFMS)
- Mod Number (Populated from UFMS)
- Email Date (Populated by Bot as date email sent to vendor)
- Due Date (Populated by Bot as 45 days from Email Date)
- Vendor Email (Populated from UFMS)
- Sec Org (Populated from UFMS)
- CO (Populated from UFMS)
- CO Email (Populated from UFMS)
- CS (Populated from UFMS)
- CS Email (Populated from UFMS)
- COR (Populated from UFMS)
- Certification Date (Populated by Bot as date email certification received from vendor)
- RPA Process Date (Populated by Bot as date last modified)
- Vendor Status (Populated by Bot as email sent, certified, or undeliverable)
- Undeliverable Email (Populated by bot as undeliverable vendor email address)

Required Bureau Action

Bureau Procurement Chiefs (BPCs) must ensure that their list of approved DOJ Security Organization recipients responsible for receiving and managing the Whistleblower Log is kept current and accurate. Any changes to the list of recipients should be sent to the RPA Support Team at RPA@jmd.usdoj.gov.

BPCs must also establish a process for review and adjudication of the Whistleblower Log inputs to ensure that vendors comply with the distribution requirements detailed in the Whistleblower Information Distribution (OCT 2021) clause by the 45-day deadline. For those vendors that do not click on the "I Certify" hyperlink to confirm their distribution in a timely manner, the CO/CS or other official managing compliance may need to follow-up directly. A copy of the email certification confirmation the Bot sends to the CO/CS once the vendor verifies distribution should be added to the contract file.

Internal Point of Contact, Questions, Additional Information

For questions on this notice, please send an email to DOJAcquisitionPolicy@usdoj.gov.

For problems related to the Bot, contact the Ask JMD Help Desk at ASK.JMDFinanceSystems@usdoj.gov or UFMS Support at UFMS.Support@usdoj.gov.

For general RPA inquiries, contact the RPA Support Team at RPA@jmd.usdoj.gov.