Reclamation Manual
Directives and Standards

TEMPORARY RELEASE
(Expires 12/4/2022)

United States Department of the Interior
BUREAU OF RECLAMATION
P.O. Box 25007
Denver, CO 80225-0007

IN REPLY REFER TO:
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VIA ELECTRONIC MAIL ONLY

Memorandum

To: All Bureau of Reclamation Employees

From: Karla Smiley
Acting Associate Chief Information Officer

Diana M. Terrell
Bureau Procurement Chief

Subject: Guidance for the Purchase of Headphones/Headsets

The purpose of this memorandum is to establish consistent guidance for the purchase of headsets/headsets in the workplace. The Information Management Technology (IMT) Procurement Cadre is the only authorized purchaser for headphones/headsets, regardless of whether the selected headphone/headset is Bluetooth enabled or not. Requesters shall follow the process and submit requests through the IMT Micro-Purchase SharePoint.

The following categories of headphones/headsets that may be purchased and the allowability of these purchases are provided below:

- **Noise Cancelling Headphones/Headsets for Office Use:** Headphones/headsets that are purchased for office use for which the main purpose is to cancel out noise are considered a personal item. These headphones/headsets should be purchased by employees using their own personal funds, unless the purchase is being made for an approved reasonable accommodation, which was coordinated with their local Accommodation Coordinator (AC). The individual must provide a memo signed by their local AC which provides verification of the need and approval to purchase.

- **Headphones/Headsets for Government Issued Mobile Phone Use:** Employees shall use the headphones provided with the government issued phone, unless a justification approved by the Head of Contracting Activity (HCA) and Associate Chief Information Officer (ACIO) is provided to purchase different headphones/headsets or unless the purchase is being made for an approved reasonable accommodation which was coordinated with their local AC. The individual must provide a memo signed by their local AC which provides verification of the need and approval to purchase. If the original headphones provided with the mobile device are lost or damaged, they may be replaced with like items in terms of cost and functionality. Headphones/headsets that would be considered not to be like items require approval by the
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HCA and ACIO (Apple AirPods, Beats, etc.). Definition of ‘like items’ must pass the reasonable person’s standard.

- **Headphones/Headsets for Computer Use**: Refer to Information Resource Office’s (IRO’s) website for the recommended headphones/headsets. Any purchases other than those recommended must be approved by the HCA and ACIO, unless the purchase is being made for an approved reasonable accommodation which was coordinated with their local AC. The individual must provide a memo signed by their local AC which provides verification of the need, and approval to purchase.

- **Headphones/Headsets for Desk Phone Use**: Refer to IRO’s website for the recommended headphones/headsets. Any purchases other than those recommended must be approved by the HCA and ACIO, unless the purchase is being made for an approved reasonable accommodation which was coordinated with their local AC. The individual must provide a memo signed by their local AC which provides verification of the need, and approval to purchase.

Any previous purchase found of personal headphones/headsets exceeding the government’s minimum need may require reimbursement to the Government.

An Approving Official (AO) has discretion in determining if replacement of an original set of mobile phone headphones is necessary. While AOs have discretion in determining business need, they also have the responsibility of complying with Federal appropriation law, the legal framework regarding the availability of appropriations. Specifically, Principles of Federal Appropriations, Chapter 3-Availability of Appropriations-Purpose, provides that public’s money is not available for personal expenses [unless specific statutory authority exists]. Furthermore, case law has consistently ruled that expenditures for personal convenience, comfort, or desire are prohibited unless the expenditure “primarily benefits the agency, notwithstanding any collateral or incidental benefit to the employee.” Therefore, AO’s must ensure that any purchases, including headphones/headsets, are not above the government’s minimum need.

If you have any questions, contact the Manager, Planning and Compliance Division, IRO at (303) 445-2092 or the Chief of the Contracting Office, Denver Office Acquisitions at (303) 445-2529.

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