



LEGAL BULLETIN

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Digital Approvals

Process Integrity... or Decision Integrity?

When Approval Is Not Merely a Procedural Step

Federal entities are witnessing an increasing expansion in the use of digital and financial systems to manage operational procedures, particularly approval workflows related to financial commitments and contracts, within legislative and regulatory frameworks that remain the governing reference for any decision or obligation.

With this expansion, approval within the system is not limited to being a procedural step; rather, depending on its position within the process, it represents a decision point that results in a real impact.

Accordingly, treating system outputs as a formal procedure, or assuming that they in themselves constitute the basis of the decision, may lead to legal or financial consequences without sufficient awareness of their legal basis or scope.

What Governs the Decision... Behind the System?

Decisions derive their legitimacy from approved legislative and regulatory frameworks, while the role of the digital system is limited to translating them into procedures that are executable, traceable, and documented.

An action within the system does not, in itself, produce an independent legal effect; rather, it reflects what is taken within the scope of approved authorities. The distinction between a “technical procedure” and an “administrative decision” therefore remains fundamental.

The completion of a procedure within the system is not, in itself, sufficient to confer legitimacy, unless it is based on a valid legal foundation and supported by approved authorities.

When Does the Process Appear Correct... While the Decision Is Not?

The system-based process may appear complete, while the decision may not be.

This occurs when reliance is placed on procedural form, or when it is assumed that what the system allows reflects what is permitted under the legislative and regulatory framework.

⚠ Practices That Require Caution

- Treating what is presented by the system as the reference for the decision instead of the approved legislative and regulatory basis.
- Assuming that responsibility shifts to the system once the procedure is approved.
- Relying on the completion of the system process without analyzing the substance of the action and its impact.
- Issuing approvals without sufficient verification of the accuracy of data and supporting documents.
- Replacing professional judgment with automation logic, particularly in non-routine cases.
- Exercising authority without verifying its scope and implications.

❓ What Should Be Verified Before Approving the Decision?

- Is the decision based on a valid legal foundation?
- Are the data and supporting documents complete and accurate?
- Does the decision require professional judgment beyond the system process?
- Has authority been exercised within its scope and implications?
- Is there a need for coordination before approval?

⚠ Not Every Approval Within the System Is a Correct Decision

Approval within the system constitutes a decision point that may result in a real impact; however, the correctness of this decision is not measured by the regularity of the process, but by the extent to which it is based on a valid legal foundation and the accuracy of its underlying data.

Accordingly, the regularity of the process does not, in itself, constitute an indicator of the correctness of the decision.

The system remains a tool for executing and documenting the decision, without being its source or a substitute for professional judgment.

