

## **GSA ORDER**

Subject: General Services Administration Acquisition Manual; GSAM Case 2021-G501, Lease Warrant Clarifications

1. Purpose. This order transmits a revision to the General Services Administration Acquisition Manual (GSAM) to clarify “individual transactions” for lease procurement warrant authority, to place an absolute lease contract value for use of a simplified lease warrant, and to require affixing a lease number to any procurement document supporting a lease.
2. Background. The General Services Administration (GSA), as part of its continuous review of its best business practices and business controls, identified some policies regarding lease warrants and lease documentation that required revision to provide for better management.

Previously, the guidance for “individual transactions” spoke to “contracts”, which often did not resonate in the leasing community. GSA is updating the language on individual transactions to clearly address leasing actions.

Additionally, GSA simplified lease warrant thresholds were only subject to a net annual amount of rent, with no consideration of other lease costs which can account for a significant portion of the total contract value. GSA is making changes to the simplified lease warrant threshold to include a ceiling dollar amount for the total lease contract value.

Revising the warrant authority language for individual transactions and simplified leases will help ensure that appropriate procedures are followed commensurate with the risk of the procurement.

Further, Reimbursable Work Authorizations (RWAs) did not uniformly include any identification number for the lease to which the RWA was connected. GSA is making changes to require that any procurement documents that support leasehold interests have the lease number displayed on the document. This will ensure that GSA can properly track the dollars associated with each given lease, better enabling GSA to manage and report on customer-agency spend.

3. Effective date. February 1, 2022
4. Explanation of changes. This amendment includes non-regulatory changes. For full text changes of the amendment see Attachment A, GSAM Text, Line-In/Line-Out.

This amendment revises the language of the following GSAM subparts, changes summarized below:

- 501.6 (Career Development, Contracting Authority, and Responsibilities)
  - 501.603-1 (General), adds definitions of the terms “Lease amendment” and “Total lease contract value”.
  - 501.603-1 (General), clarifies that “individual transactions” for lease procurements are measured by “total lease contract value” and “lease amendment award” values, respectively.
  - 501.603-1 (General), clarifies that “Simplified” warrant authority for lease procurements is limited to a total lease contract value below \$10,000,000.
- 504.16 (Unique Procurement Instrument Identifiers)
  - 504.1670 (Unique identifier for procurements supporting a leasehold interest), provides new requirements that the lease number be affixed to any procurement document that supports a particular leasehold interest.

5. Cancellations. None.

6. Point of contact. For clarification of content, contact Bryon Boyer, GSA Acquisition Policy Division, at [gsarpolicy@gsa.gov](mailto:gsarpolicy@gsa.gov).

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**GSAM Text, Line-In/Line-Out  
GSAM Case 2021-G501**

**GSAM Baseline: Change 145 effective 01/20/2022**

- Additions to baseline made by rule are indicated by **[bold text in brackets]**
- Deletions to baseline made by rule are indicated by ~~strikethroughs~~
- Five asterisks ( \* \* \* \* \* ) indicate that there are no revisions between the preceding and following sections
- Three asterisks ( \* \* \* ) indicate that there are no revisions between the material shown within a subsection

**PART 501 - GENERAL SERVICES ADMINISTRATION ACQUISITION REGULATION  
SYSTEM**

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**Subpart 501.6 - Career Development, Contracting Authority, and Responsibilities**

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**501.603-1 General.**

(a) *Definitions.*

\* \* \*

**["Lease amendment" includes the dollar value of Reimbursable Work Authorizations and is based on the absolute value of changes.]**

**["Total lease contract value" means the entire lease award amount at initial award, including the dollar value of option periods and excluding the dollar value of Reimbursable Work Authorizations for tenant improvements that are above standard agency tenant improvement allowances.]**

(b) \* \* \*

(c) *Contracting Officer Warrant Program (COWP).* \* \* \*

(5) *Warrant levels.*

(i) COWP warrant levels are based on the dollar value of individual transactions.

(ii) Individual transactions include the following:

(A) The dollar value of a contract **[at] award [or a total lease contract value at award]**, including the dollar value of option periods.

(B) The dollar value of a modification award **[or lease amendment award, individually]**, and not the aggregate contract dollar value **[of a contract or lease including the contract modification or lease amendment]**.

\* \* \*

(iv) Warrant thresholds.

Warrant Level	Threshold
* * *	* * *
Simplified	SAT (SLAT for Leasing[]) <sup>1</sup>
* * *	* * *

**[<sup>1</sup> SLAT Warrant Procurement Limit. Lease procurement awards using a Simplified warrant shall not exceed a total lease contract value of \$10,000,000.]**

Note: [(v)] GSA use of the Government purchase card for micro-purchases shall follow the instructions under GSA Order 4200.1A CFO.

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## **PART 504 - ADMINISTRATIVE MATTERS**

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### **Subpart 504.16 - Unique Procurement Instrument Identifiers**

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**[504.1670 Unique identifier for procurements supporting a leasehold interest.**

**(a) General.** Procurements supporting a leasehold interest include: architectural and engineering (A&E) design and other related activities, project management, construction, space alterations (irrespective of size or scope), security-related tenant buildout, building-specific security countermeasures, personal (moveable) property, and overtime utilities.

**(b) Procurement Actions.** Any procurement supporting a leasehold interest (including those at or below the micro-purchase threshold), including stand-alone contracts or lease amendments, must reference the associated lease number (8-character number such as LMA00001) in the system of record (e.g., EASi, G-REX, RETA, REXUS, Pegasys) in which that action is being processed or recorded, and on the procurement document. Data must be recorded in a standardized data field, as appropriate. For systems that do not have the capability to capture the

associated lease number, the lease number may be placed on the procurement document itself alone.

**(c) *Reimbursable Work Authorizations (RWAs).***

**(1) *RWAs prior to lease award.*** For any RWA submissions (including at or below the micro-purchase threshold) where the lease is not yet awarded, the associated lease number (8-character number such as LMA00001) shall be input into the system of record for the RWA and on the procurement document, within 3 business days of the lease award date or the creation of a lease number, whichever is later. Data must be recorded in a standardized data field, as appropriate. For systems that do not have the capability to capture the associated lease number, the lease number may be placed on the procurement document itself alone.

**(2) *RWAs after lease award.*** For any RWA submissions (including at or below the micro-purchase threshold) where the lease is already awarded, the associated lease number (8-character number such as LMA00001) shall be input into the system of record for the RWA and on the procurement document. Data must be recorded in a standardized data field, as appropriate. For systems that do not have the capability to capture the associated lease number, the lease number may be placed on the procurement document itself alone.]

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