

## GSA ORDER

Subject: General Services Acquisition Regulation (GSAR) Case 2016-G508, Part 504, Administrative Matters

1. **Purpose.** This order transmits a revision to the General Services Administration Acquisition Regulation (GSAR).
2. **Background.** The Federal Acquisition Regulation (FAR) 4.604 requires the Senior Procurement Executive to develop a process to monitor timely and accurate reporting of contractual actions into the Federal Procurement Data System (FPDS). Additionally, the section requires the Chief Acquisition Officer of each agency to certify annually whether its contract actions in FPDS were complete and accurate.

On October 7, 2009, the Office of Procurement Policy (OFPP) issued a memorandum which outlined steps agencies must take to improve acquisition data quality. Additionally, it established the information required for certification on contract actions in FPDS. On May 31, 2011, OFPP issued a memorandum with additional guidance to standardize the annual certification for verifying and validating agency FPDS data.

GSA conducts FPDS Quarterly and Annual reviews to monitor and ensure the accurate and timely input of data into FPDS in accordance with FAR 4.604 and the OFPP guidance. The GSAM is being updated to clarify the processes and responsibilities of the reviews.

3. **Effective date.** January 3, 2017
4. **Explanation of changes.** Section 504.604 of the GSAM is changed from regulatory to nonregulatory. This means the section will no longer be in the Code of Federal Regulation but it will continue to be in the GSAM on Acquisition.gov.

The language in 504.604 has been updated to reflect current procedures for monitoring contract actions in FPDS. Subsection 504.604(a)(3) was removed because the number of contract reporting days conflicted with the FAR requirement. The remaining text was restructured to more clearly breakdown the monitoring requirements for contract writing systems, quarterly reviews and the annual certification in accordance with FAR 4.604(c). Additional clarification language was added to augment the existing text, and any duplicative language was removed. There were no significant content changes resulting from the amendments.

The attached line-in line-out shows the specific changes made to the GSAM.

5. Cancellations and Rescissions:

None.



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**GSAR Case 2016-G508**  
**Update Contract Reporting Responsibilities**  
**Tab AA - GSAM Text, Line-In/Line-Out**

**GSAM Baseline: Change 79 effective 10/18/2016**

- Additions to baseline made by final rule are indicated by [bold text in brackets]
- Deletions to baseline made by final rule are indicated by strikethroughs

**504.604 Responsibilities.**

~~(a) The Senior Procurement Executive (SPE), in coordination with the HCA, shall establish necessary policies to ensure the accurate and timely input of data into FPDS. At a minimum, the SPE and the HCA shall ensure that the following procedures are implemented.~~

~~(1) Contract writing systems capable of reporting directly into FPDS shall be configured to do so as a condition of making an award.~~

~~(2) To ensure the accuracy of data entered, reports of actions awarded shall be routinely generated from the contract writing system, examined and compared to data contained in FPDS to assure that these actions have been reported accurately to FPDS.~~

~~(3) Organizations without a contract writing system shall report the data using the FPDS web portal interface not later than 14 days after an award is made. To ensure data entry and accuracy, logs of contract actions shall be regularly reviewed and compared to data entries in FPDS.~~

~~(4) HCAs shall also verify and validate accuracy of the data and ensure contract awards have been entered into FPDS within the appropriate time frames.~~

~~(b) Contracting officers are the individuals primarily responsible for the accuracy of data submitted to FPDS as well as the submission and accuracy of the individual contract action report (CAR).~~

~~(e) The contracting officer shall, at a minimum, take the following steps necessary to verify the accuracy of the CAR:~~

~~(1) In the case of a contract writing system, review the CAR information for accuracy and completeness prior to submission to FPDS and prior to the release of the contract award.~~

~~(2) In the absence of a Contract Writing System, ensure that the CAR information is submitted to FPDS within 14 days after contract award.~~

~~(3) To further assure accurate contract data, consider including a copy of the CAR with award documents sent to the contractor for the contractor's knowledge review and information.~~

~~(d) The Chief Acquisition Officer (CAO) shall periodically statistically sample the GSA FPDS file and provide a list of transactions to the contracting activities for certification.~~

~~(1) The review process should include procedures, comparisons of contract file data to FPDS data entries, and comparisons of printouts of FPDS data to their contract writing system data for accuracy.~~

~~(2) The verification and validation shall be conducted by an organization or person that did not award the contracts being reviewed. HCAs may institute any appropriate process that complies with this requirement.~~

~~(3) HCAs shall provide certifications of the accuracy, timeliness and validity of their FPDS data on a quarterly basis to the CAO based on the list of transactions provided to HCAs under paragraph (d) of this section. Certifications to the CAO shall include a description of the means used to verify the accuracy and completeness of the data and a statement that all discrepancies found have been corrected.~~

~~(e) The CAO will provide the annual certification of GSA's FPDS data to OMB required by FAR 4.604(e). This certification will be based on the Regional and Heads of Services and Staff Offices' reviews and certifications, and the CAO's review. Certifications are due not later than 15 working days after the end of the quarter.~~

#### **504.604 Responsibilities.**

In accordance with FAR 4.604, the Senior Procurement Executive (SPE) has implemented the following policies to monitor and ensure the accurate and timely input of data into FPDS. Additional guidance is available on the GSA Acquisition Portal (<https://insite.gsa.gov/fpdsvandv>).

##### **(a) Contract writing systems.**

(1) The responsibility of the contracting officer to report awards in FPDS per FAR 4.604 may be accomplished by a contract writing system that reports the contract action directly to FPDS.

(2) Contract writing systems capable of reporting directly into FPDS shall be configured to report as a condition of making an award.

(3) Contract actions reported through contract writing systems shall be routinely examined and compared to data contained in FPDS to ensure that those actions have been reported accurately to FPDS.

##### **(b) Quarterly Reviews.**

(1) The HCAs are responsible for the following:

(i) Establishing a selection methodology for an appropriate random sample of contract files for review that is representative of their Service's contract actions. The sample does not need to be statistically significant.

(ii) Verifying and validating the accuracy of contract action reports (CARs)

entered into FPDS through the reviews.

(iii) Submitting a certification of the accuracy of the CAR data to the Chief Acquisition Officer (CAO). Certifications are due no later than 30 business days after the end of the quarter.

(2) Any data discrepancies identified in the contract file during the verification and validation process shall be corrected.

(3) File selection and review may begin immediately after the end of each quarter using the selection methodology determined by the HCA in paragraph (b)(1)(i) of this section.

(c) Annual Reviews.

(1) In accordance with FAR 4.604(c), the CAO shall annually sample the GSA FPDS records and provide a list of transactions to each HCA for verification, validation, and certification.

(2) The verification and validation shall be conducted by an organization or person that did not award the contracts being reviewed. HCAs may institute any appropriate process that complies with this requirement.

(3) The process to verify and validate shall include comparisons of contract file data to FPDS data entries and comparisons of FPDS data to contract writing system data to determine completeness and accuracy, if applicable.

(4) HCAs shall provide certifications of the accuracy and validity of their FPDS data to the CAO based on the list of transactions provided to HCAs under paragraph (c)(1) of this section.

(5) Certifications to the CAO shall include a description of the means used to verify the accuracy and completeness of the data and a statement that all discrepancies found have been corrected.

