



April 21, 2020

Acquisition Letter MV-20-07

MEMORANDUM FOR ALL HEADS OF SERVICES AND STAFF OFFICES AND THE GSA ACQUISITION WORKFORCE

FROM: JEFFREY A. KOSES, SENIOR PROCUREMENT EXECUTIVE OFFICE OF ACQUISITION POLICY (MV)

JEFFREY KOSES

Digitally signed by JEFFREY KOSES Date: 2020.04.21 10:33:14 -04'00'

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SUBJECT: Temporary Policy for Contractor Onboarding and Offboarding During Novel Coronavirus Disease (COVID-19)

1. Purpose.

This Acquisition Letter (AL) provides guidance for the acquisition workforce and physical security specialist communities during the Novel Coronavirus Disease of 2019 (COVID-19) national pandemic regarding onboarding and offboarding contractor employees.

2. Background.

In response to COVID-19, GSA is adjusting procedures for onboarding and offboarding contractors working on GSA contracts<sup>1</sup>. Procedures for standard face-to-face credentialing, termination of credentials/building access, and issuance and collection of Government supplied Equipment (GFE) for contractors must be temporarily changed.

The pandemic has created unique supply chain issues, resulting in a shortage of certain IT equipment. Federal Acquisition Regulation (FAR) Clause 52.245-1, Government

<sup>1</sup> See SPE Memo SPE-2020-07 for guidance on flexibilities to allow government contractors to telework during the COVID-19 pandemic.

Property<sup>2</sup> outlines the contractual requirements related to the issuance and return of government property. Additionally, GSA contracting officers shall identify the specific types of government property in Section C or another appropriate section of the contract.

For new contractor employees, GSA will temporarily revise its physical presence requirements associated with onboarding, in accordance with guidance recently issued by the Department of Homeland Security (DHS)<sup>3</sup> and the Office of Personnel Management (OPM)<sup>4</sup>.

### **3. Effective Date.**

This AL is effective immediately.

### **4. Expiration Date.**

This AL expires one year from the date of signature unless cancelled or extended.

### **5. Cancellation.**

Not applicable.

### **6. Applicability.**

This AL applies to all contracts or orders awarded by GSA that involve issuance of GSA Access Cards (i.e., Personal Identity Verification (PIV) Cards) to contractors for entry into Federal facilities, receipt of government-supplied IT equipment, or access to the GSA network with contractor IT equipment.

### **7. Requirements.**

In response to COVID-19, the following procedures are in place. These procedures supersede any instruction and/or requirement currently in place as it relates to GSA Access Cards or GFE issuance:

(a) Temporary changes being made for contractor onboarding:

(i) Contractors requiring physical access to Government

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<sup>2</sup> FAR clause 52.245-1 should be included in i) all cost-reimbursement and time-and-material type solicitations and contracts, and labor-hour solicitations when property is expected to be supplied for the labor-hour contracts, and ii) fixed-price solicitations and contracts when the Government will provide Government property.

<sup>3</sup> See [DHS announces flexibility in requirements related to Form I-9 compliance](#), dated March 20, 2020

<sup>4</sup> See [OPM Memorandum On-Boarding Processes for New Employees During the COVID-19 Emergency](#), dated March 24, 2020

facilities<sup>5</sup>.

(A) GSA Requesting Officials (generally a function delegated to the Contracting Officer's Representative (COR)) will continue to collect and process fingerprints for vetting and issuance of GSA Access Cards to the extent feasible. The collection and submission of fingerprints may be delayed from normal timeframes.

(B) If a GSA Access Card cannot be issued in time, the contractor must follow access procedures established by the Facility Security Committee (FSC), which may require an escort in the absence of a GSA Access Card. This process is provided at the facility checkpoint upon entrance to the facility if the facility has a checkpoint for screening. The Building Management Office for each facility is the best place to identify visitor screening processes.

(C) The full revised process for issuing GSA Access Cards is found at: <https://www.gsa.gov/hspd12> "Get Your GSA Access Card", "[New GSA Contractors](#)".

(ii) Contractors teleworking to support operations and/or requesting Government supplied IT equipment (laptops, tablets, smart phones, etc.) or network access.

(A) GSA IT has a limited number of laptops and other IT equipment available. Due to the limited supply on hand, government laptops will not be supplied to GSA contractors during the national pandemic until further notice. New IT requests from existing contractors not previously issued GFE also will not be permitted during this time.

(B) If contractors require access to GSA's network, the contracting officer, or their representative must submit a request to [activate](#) access in compliance with GSA's IT Security Standards. To ensure GSA IT Security Standards are met requests for network access should be submitted to the GSA IT Help Desk.

(C) In the instance that contractor-supplied IT equipment is non-conforming to GSA's minimum IT specifications, the Requesting Official (generally the CO or the COR) shall complete

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<sup>5</sup> [OMB memo M-20-16](#) and [SPE-2020-08](#) provide guidance on whether contractors need physical access to facilities

the IT [waiver](#) for non-standard equipment, and provide a business justification. The waiver and justification must be approved prior to the contractor being granted limited access to the GSA network. Upon approval of all applicable waivers, the GSA Requesting Official must initiate activation of network access for the contractor-supplied IT equipment by submitting an IT ServiceNow help desk request to [activate](#) access to the GSA Network.

(D) If a newly awarded contract specifies that GSA will provide IT equipment as GFE, the Contracting Officer should make every effort to negotiate a no-cost modification to permit use of contractor-supplied IT Equipment in accordance with the requirements outlined above and any applicable GSA IT guidance. See sample modification language for existing contracts in Attachment 1. New contracts and or contracts on solicitation shall include a section within the Statement of Work to address contractor-supplied IT equipment during the COVID-19 national pandemic. Contracting Officers should work with their program office to develop temporary language to address contractor-supplied equipment. Previously awarded contracts where the contractor received GFE are not presently impacted.

(b) Temporary changes being made to contractor offboarding:

(i) Returning contractor's GSA Access Cards.

(A) As part of the offboarding process, the contractor shall mail all GSA Access Cards to: HSPD-12 Program Management Office, 1800 F Street, N.W., Washington D.C. 20405.

(B) No changes should be required in the contract since [GSAR Clause 552.204-9](#) outlines procedures for contractors to follow to return GSA access cards. The clause refers contractors to <https://www.gsa.gov/hspd12>. Revisions giving temporary guidance have been made to [this page](#).

(ii) Terminating facility and network access.

(A) The existing requirement for the Requesting Official (generally the CO or the COR) to notify the Office of Mission Assurance (OMA) when a contractor no longer requires access remains in place.

(B) Once OMA is notified the contractor no longer requires access, OMA will remove the contractor's badge access to federal buildings and terminate building access certificates.

(C) The Requesting Official (generally the CO or the COR) shall submit a ticket to GSA IT in [Service Now](#) to cancel the contractor's access to the GSA network.

(iii) Returning Government supplied IT Equipment (laptops, tablets, smart phones, etc.)

(A) Contractor employees who have already received Government supplied IT equipment shall follow the disposition procedures at FAR 52.245-1(f)(x) *Property Closeout*.

(B) The GSA Requesting Official (generally delegated function to the COR) must initiate deactivation of network access on both contractor-supplied and government-supplied IT and the return of GFE by submitting an IT help desk [deactivation request](#) in ServiceNow removing all access from the network.

(C) GSA IT will contact the offboarding contractor and provide a prepaid mailer with instructions for the return of GSA issued IT equipment. The contractor will be instructed to return GFE to a specified location and provide the government with tracking information to ensure receipt.

(D) The Contracting Officer (or designated representative) must document the file with the confirmation of Government acceptance (e.g. tracking information showing receipt of equipment).

## 8. Point of Contact.

Questions regarding this acquisition letter may be directed to the following:

- For acquisition policy questions: [GSARPolicy@gsa.gov](mailto:GSARPolicy@gsa.gov).
- For GSA IT questions: [itservicedesk@gsa.gov](mailto:itservicedesk@gsa.gov) or 866-450-5250
- For question with credentialing or access management: [hspd12.security@gsa.gov](mailto:hspd12.security@gsa.gov) or 202-501-4459

### **Attachments:**

*Attachment 1:* Sample contract modification language for temporary use of contractor supplied IT equipment

## **Attachment 1**

The following is suggested as sample modification language for contracts that will require a bilateral modification to permit the temporary use of contractor supplied IT equipment during the COVID-19 national pandemic:

Prescription: FAR 43.204(c) Administration

Authority: [SELECT RELEVANT CONTRACT CLAUSE] Commercial - FAR 52.212-4(c).  
Non-Commercial - FAR 52.243-1 and Alternate as applicable

The parties hereby mutually agree that the use of contractor supplied IT equipment (laptops, tablets, cellphones, etc.) is temporarily authorized. Contractor-supplied IT equipment will be used in lieu of the Government supplied Equipment as identified in [INSERT RELEVANT SECTION OF THE CONTRACT].

All equipment, either contractor-supplied or government-supplied, must comply with GSA IT Security standards as identified by the GSA IT Help Desk.

### Contractor's Statement of Release

In consideration of the modification(s) agreed to herein as complete, the Contractor hereby releases the Government from any and all liability under this contract for further equitable adjustments attributable to use of contractor-supplied IT equipment in lieu of Government supplied Property for performance of work on this contract.

All other terms and conditions remain the same.