

## **Subchapter 3004.6 Contract Reporting**

### **3004.603 Policy.**

(a) All DHS Components are required to report applicable contract/procurement actions directly to the Federal Procurement Data System (FPDS), see FAR 4.6 and HSAM 3004.605. The FPDS, which is operated, updated and maintained by the General Services Administration (GSA), meets the requirements of FAR 4.6 and also has the capability to generate query reports. The FPDS is the primary source of procurement data Governmentwide and is extensively used by a variety of stakeholders (e.g., Congress, GAO, OIG, the public, etc.) and downstream systems (e.g., USASpending.gov, etc.). As a result of the extensive use of FPDS data, the quality and timeliness of DHS submissions is critical (see FAR 4.604(b)(2) and (3) for required submission timelines). All data submitted to FPDS by DHS Components shall be subject to verification and validation by the CPO and the Chief Acquisition Officer (CAO). (See FAR 4.604 and HSAM 3004.604).

(b) Components with contracting authority (i.e., the Component issuing the contract/procurement action) are identified in FPDS as the ‘awarding’ agency. The ‘awarding’ agency is the entity that is required to enter data into FPDS. The ‘funding’ agency in FPDS denotes the organization that developed the requirement. Accurate reporting of ‘awarding’ and ‘funding’ agency information is necessary to satisfy the requirements of the Federal Funding Accountability and Transparency Act (FFATA), the Data Act, and FAR 4.603(c). Funding documents, interagency agreements, and/or purchase requests/requisitions are required to contain the appropriate funding agency, funding office, and Treasury Account Symbol to ensure accurate data is recorded. If this funding information is not provided, the Contracting Officer must request this data prior to award. A listing of available DHS awarding and funding ‘agency’ information is available in FPDS using the search function.

### **3004.604 Responsibilities.**

(a) Components are responsible for performing quarterly verification and validation of FPDS data in accordance with the schedule posted in the Enterprise Reporting Application (ERA). Component HCAs are responsible for submitting an annual confirmation that the FPDS data has been reviewed for completeness and accuracy. The confirmation shall be accompanied by a statement describing, as a minimum:

- (1) The methods used to review the data;
- (2) Any actions taken to correct data previously submitted; and
- (3) Measures implemented for process improvement, such as training and periodic internal reviews.

(b) A completed final, approved version of the information entered into FPDS for each action shall be included in the contract file.

### 3004.605 Procedures.

(a) *Procurement Instrument Identifier (PIID)*. This subsection, regarding elements of DHS PIID and Supplemental PIID (SPIIDs), is mandatory for all DHS Components. The PIID refers to the Solicitation or the Award number and the SPIID refers to amendments or modifications to those instruments. The PIID is used extensively throughout the federal government to uniquely identify solicitations and awards, therefore Components must ensure the PIID is accurately created and recorded in all systems and documents. Alphanumeric characters other than those prescribed in FAR Subpart 4.16 and this subsection are not permitted. The PIID must consist of 17 alphanumeric characters and each PIID must be unique. Dashes, spaces, or any other symbols are not permitted. Task/Delivery orders and BPA calls must also follow the same 17 alphanumeric character DHS PIID structure required for any other award, (e.g., orders/calls may not be identified as 001). The DHS PIID structure consists of:

(1) *Positions one through six*. The first six characters of the PIID represent the office issuing the award; this code is known as the activity address code (AAC). This code will be reported in FPDS in the contracting agency office id field and is also the issuing office information that appears on the contract award document. Every DHS AAC begins with the Department identifier of 70 followed by a letter representing the Component. The remaining three characters of the AAC are left to Component discretion. A listing of DHS AACs used for procurement purposes can be found in FPDS.

(2) *Positions seven and eight*. A two-digit numeric code that is the last two digits of the fiscal year in which the PIID is awarded. The fiscal year is the fiscal year during which the contract action is awarded/issued (i.e., the date signed), it does not represent the effective date. A contract signed on September 30, 2017 (FY'17), for example, with an effective date of October 4, 2017 (FY'18), would use '17' in the PIID because the award was signed in FY'17.

(3) *Position nine*. A one-digit alphabetic code, in the table below, identifies the type of procurement instrument (e.g., agreement, sealed bidding, contracts, etc.). Use of any code other than those listed below in position nine is prohibited.

| Letter | Purpose  |
|--------|--|
| A      | <b>Agreement:</b> Use for blanket purchase agreement (BPA) as defined under FAR 13.3, 16.7, and <u>8.405-3</u> Federal Supply Schedules. Do NOT use for Cooperative Agreements.  |
| B      | <b>Invitation for Bids:</b> Use for solicitations as defined under FAR <u>14.2</u> .   |
| C      | <b>Contracts:</b> Use for all contracts (e.g., letter, 8(a), etc.), except indefinite delivery type contracts (see FAR 16.5).  |
| D      | <b>Indefinite Delivery Contracts:</b> Use for Indefinite Delivery, Definite Quantity, Indefinite – quantity and Requirements contracts as defined under FAR 16.5. <u>This category also includes DHS awarded Governmentwide Acquisition Contracts (GWACs) and Multi-Agency Contracts (MACs).</u> |

| Letter   | Purpose  |
|----------|--|
| <b>F</b> | <b>Task or Delivery Orders and BPA Calls:</b> Use when placing task/delivery orders against any indefinite delivery type contract (e.g., FSS, GWAC, MAC, a DHS single award IDIQ, etc.). This code is also used to identify orders against a Basic Ordering Agreement (BOA) and any BPA call issued against a BPA.                       |
| <b>G</b> | <b>Basic Ordering Agreement (BOA)</b> See FAR 16.703.  |
| <b>H</b> | <b>Agreements:</b> Agreements, including basic agreements and loan agreements, but excluding blanket purchase agreements, interagency agreements, basic ordering agreements, and leases. Do not use this code for contracts or agreements with provisions for orders or calls.   |
| <b>K</b> | <b>DHS Interagency Agreements:</b> Use when placing an order with any other Government agency or Component for supplies or services that the servicing agency may be in a position or equipped to supply, render, or obtain by contract. FAR 17.502 applies.   |
| <b>L</b> | <b>Lease Agreement:</b> Use for leasing real property and supplies or equipment. Also, includes instruments for both land and space where the Government obtains real estate rights and aerial easements for a limited period of time, and may or may not be monetary in consideration. Do NOT use this code for Interagency Agreements. |
| <b>P</b> | <b>Purchase Orders:</b> Use for ALL purchase orders (assign V if numbering capacity of P becomes exhausted during a fiscal year).  |
| <b>Q</b> | <b>Request for Quotation:</b> Use when the procedures under FAR 13 or FAR 8.405 are followed (assign U if numbering capacity of Q becomes exhausted during a fiscal year).   |
| <b>R</b> | <b>Request for Proposal:</b> Use when competitive or negotiated procedures are followed.   |
| <b>S</b> | <b>DHS Sales Contract:</b> Use for sales and other disposal of real and personal property.   |
| <b>T</b> | <b>DHS Other Transactions:</b> Use for awards made under Other Transactions Authority  |
| <b>U</b> | See Q, Request for Quotation.  |
| <b>V</b> | See P, Purchase Orders.  |
| <b>Y</b> | <b>Imprest Fund</b>  |

(4) *Positions ten through seventeen.* Components may use the remaining characters of the PIID in whatever way they choose, however, the PIID in its entirety must be exactly 17 characters long and must be unique.

(5) *Illustration of the PIID.* An example of a PIID is illustrated in the chart below. The PIID 70B02C18F01234567 identifies a task/delivery order issued by the Department of Homeland Security, Customs and Border Protection, Air and Marine Center Division Contracts office, fiscal year 2018.

| Position | Identification                                   | Code     |
|----------|--|----------|
| 1-6      | Activity Address Code                            | 70B02C   |
| 7-8      | Fiscal Year                                      | 18       |
| 9        | Type of Procurement Instrument                   | F        |
| 10-17    | Unique identifiers of the procurement instrument | 01234567 |

(6) *Supplementary Procurement Instrument Identifiers (SPIIDs)*. SPIIDs shall be used in conjunction with the PIID to identify the following:

(i) *Amendments to Solicitations*. Amendments shall be assigned a four-position numeric serial number always sequentially beginning with 0001.

(ii) *Modifications to Contracts, Agreements, BPA Calls, and Orders*.

Modifications to all awards (including contracts, agreements, BPA Calls, purchase orders, and task/delivery orders) shall be numbered sequentially with a six position alphanumeric serial number beginning with either A00001 or P00001. If contract administration is delegated to a contract administration office different from the original awarding office, the modifications issued by the administration office shall be prefaced with an “A”, otherwise use “P”. Please note that “A” shall not be used to identify an administrative modification. The “A” designation is intended only to identify contracting offices that did NOT issue the original award but are now in charge of contract administration.

(b) Certain exceptions, FAR 4.605(c) and FAR 4.1102<sub>2</sub>, provide relief from the requirement that prospective contractors be registered in the System for Award Management (SAM) (which also requires a unique entity identifier), prior to award of contracts. Among these exceptions are contracts awarded by “contracting officers in the conduct of military, humanitarian, or peacekeeping operations, particularly overseas and in foreign ports,” or “contracting officers in the conduct of emergency operations, particularly under the Robert T. Stafford Disaster Relief and Emergency Assistance Act.” Notwithstanding the requirements of HSAM Subchapter 3004.9, if it is impractical to obtain a unique entity identifier from a prospective contractor under one of the allowable exceptions of FAR 4.605(c), and FAR 4.1102<sub>2</sub>, contracting officers may use, the following list of “generic” entity identifiers when reporting to FPDS. Because use of these identifiers precludes the ability of the government and the vendor to satisfy a number of other mandatory reporting requirements (e.g., eSRS, Service Contract Inventory, past performance, etc.), “Generic” entity identifiers must only be used when absolutely necessary. Additionally, contracting officers must ensure that contract award documents and related financial transaction data record the actual contractor information and NOT the “generic” information in order to prevent improper payments.

| Entity Identifier | Description-Name  |
|-------------------|---|
| 123456787         | Miscellaneous Foreign Awardees – (Used to report actions made to awardees located outside the US when there is no possible way to get an agency identifier) |

|           |   |
|-----------|---|
| 136666505 | Spouses of Service Personnel  |
| 136721250 | Governmentwide Purchase Card (GPC) Consolidated Reporting – (Used to report purchase card actions under the micro-purchase threshold (MPT) when consolidated reporting is used)     |
| 136721292 | Governmentwide Purchase Card (GPC) Foreign Contractor Consolidated Reporting - (Used to report purchase card actions under the MPT when consolidated reporting is used)             |
| 153906193 | Foreign Utility Consolidated Reporting – (Used to report actions made to prime awardees located outside the US providing utilities services when a unique entity id is unavailable) |
| 167445928 | Student Workers in Laboratories   |
| 167446249 | Navy Vessel Purchases in Foreign Ports  |
| 790238638 | Domestic Contractor (Undisclosed) – (Used to report actions made to prime awardees located within the US where identifying the awardee could cause harm to the mission or awardee)  |
| 790238851 | Foreign Contractor (Undisclosed) – (Used to report actions made to prime awardees located outside the US where identifying the awardee could cause harm to the mission or awardee)  |

### **3004.606 Reporting Data.**

(a) In situations where the Governmentwide commercial purchase card is used as a form of payment only (i.e., any transaction over the micro-purchase threshold), a corresponding procurement instrument must be created with a PIID and the transaction must be reported to FPDS. This requirement applies to all procurement actions, regardless of the solicitation process used, with the exception of those actions listed in FAR 4.606(c).

### **3004.670 Acquisition related reporting requirements.**

Unless otherwise advised by the CPO or the HCA, the Chief of Contracting Office (COCO) shall ensure that each report found in Appendix B is submitted to the required location by the due date.