

GSA ORDER

Subject: General Services Administration Acquisition Manual; GSAM Case 2022-G512,
Acquisition Management Structure

1. Purpose. This order transmits a revision to the General Services Administration Acquisition Manual (GSAM) to clarify the management structure and responsibilities for Heads of Contracting Activities (HCA), Contracting Directors, Advocates for Competition, and Acquisition Career Navigators.
2. Background. GSA has previously issued several separate delegation memos providing authority and guidance for Service or Staff Offices (e.g., FAS, PBS, OAS) concerning the responsibilities and limitations of HCAs as well as limitations on redelegating HCA authority. GSA reviewed these memos and determined there was a need to provide better consistency and clarity for the guidance. This GSAM amendment consolidates and streamlines the separate HCA guidance into the GSAM.

In addition, GSA procurement management reviews (PMRs)¹ have identified best practices in how GSA contracting activities delegate key acquisition roles, including Contracting Directors, Advocates for Competition, and Acquisition Career Navigators. This GSAM amendment provides guidance for GSA HCAs in establishing these internal controls as well as a standard method to identify these key roles.

3. Effective date. February 1, 2023
4. Explanation of changes. This amendment includes non-regulatory changes. For full text changes of the amendment see Attachment A, GSAM Case 2022-G512 Text Line-In/Line-Out.

This amendment revises the language in the following GSAM subparts as summarized below:

501.6 (Career Development, Contracting Authority, and Responsibilities)

- Moved the definition for Acquisition Career Manager to 502.101.
- Moved the definition for Acquisition Career Navigator (previously Acquisition Career Management Point of Contact) to 502.101.

¹ PMRs are an internal control implemented in accordance with OMB Circular A-123.

- Added 501.601(b)(1) as the designated section concerning the duties, authorities, and limitations of contracting officials. This section provides an overview of the responsibilities for contracting officials and additional resources available on the GSA Acquisition Portal.
- Added 501.601(b)(2) to describe the responsibilities of the Head of Contracting Activity position. Paragraphs (i) through (iv) outline the main responsibilities of the HCA. Paragraph (v) describes the limitations on HCA authority as it relates to redelegation. Paragraph (ii) includes guidance regarding construction-related procurements, as agreed between FAS and PBS.
- Added 501.601(b)(3) to describe the responsibilities of the Contracting Director position. Paragraph (i) describes the responsibilities of the Contracting Director as it relates to the acquisition function. Paragraph (ii) describes appointment requirements.
- Added 501.601(b)(4) to describe the responsibility of the Advocates for Competition position.
- Added 501.601(b)(5) to describe the responsibilities of the Acquisition Career Navigator (ACN) position. Paragraph (i) describes the responsibilities of the ACN as it relates to the acquisition function. Paragraph (ii) describes the ACN position within FAS Office of Policy and Compliance (OPC) and FAS Central Office. Paragraph (iii) describes the ACN position within the PBS Office of Acquisition Management (OAM) and PBS business lines. Paragraph (iv) describes appointment requirements.
- Added in 501.601(c) to outline the acquisition career management positions and remove the responsibilities for the Acquisition Career Management Points of Contract. The ACN replaced the ACM POC.

501.7 (Determinations and Findings)

- Removed subpart and incorporated the information in the definition of Head of the Agency under 502.101.

502.1 (Definitions)

- Added the definition for Acquisition Career Manager.
- Added the definition for Acquisition Career Navigator.
- Changed the name of Agency Competition Advocate to Agency Advocate for Competition to align with FAR 6.5.
- Reorganized the membership requirements for the Acquisition Workforce and added in number (7) to identify individuals who have authority to enter into and administer leases on the Government's behalf.
- Changed the name of Procuring Activity Competition Advocate to Contracting Activity Advocate for Competition to align with FAR 6.5.
- Added language to the definition of Contracting Activity Advocate for Competition to clarify that they are designated in writing by the HCA and execute responsibilities as defined in FAR 6.502.

- Revised language in the definition of Contracting Director to clarify that they are designated in writing by the HCA and execute responsibilities as defined in GSAM 501.601. Removed language identifying specific positions as Contracting Directors.
- Added the definition for the Head of the Agency.
- Added language to the definition of Head of the Contracting Activity to define who serves in that role within each Service office.

506.5 (Competition Advocates)

- Removed subpart and incorporated the information into the definition of Contracting Activity Advocate for Competition under 502.101.

517.2 (Options)

- Removed reference to ADM 5450.39D, GSA Delegations of Authority Manual in 517.204 to clarify that the acquisition workforce should follow the guidance in the GSAM.

522.3 (Contract Work Hours and Safety Standards Act)

- Removed reference to ADM 5450.39D, GSA Delegations of Authority Manual in 522.302 to clarify that the acquisition workforce should follow the guidance in the GSAM.

522.4 (Labor Standards for Contracts Involving Construction)

- Removed reference to ADM 5450.39D, GSA Delegations of Authority Manual in 522.406-8 to clarify that the acquisition workforce should follow the guidance in the GSAM.

5. Cancellations. SPE-2021-04, SPE-2021-08 and SPE-2021-09 are hereby canceled.

6. Point of contact. For clarification of content, contact Michaela Mastroianni or Clarence Harrison Jr, GSA Acquisition Policy Division, at gsarpolicy@gsa.gov.

Jeffrey Koses
 Senior Procurement Executive
 Office of Acquisition Policy
 Office of Government-wide Policy

GSAM Case 2022-G512
GSAM Text, Line-In/Line-Out

GSAM Baseline: Change 160 effective 01/12/2023

- 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
- Regulatory GSAR language is indicated by shaded text
- Non-regulatory GSAM language is indicated by unshaded text

Part 501 - General Services Administration Acquisition Regulation System

* * * * *

Subpart 501.6 - Career Development, Contracting Authority, and Responsibilities

501.601 General.

(a) Definitions. [As used in this subpart—]

~~“Acquisition Career Manager (ACM)” means the GSA agency official within the Office of Acquisition Policy that has been appointed by the CAO, or designee, to lead the agency’s acquisition career management programs.~~

“Administrative Warrant Issuing Agent” means the Director of the GSA Acquisition Workforce Division (AWD) within the Office of Acquisition Policy.

~~“Acquisition Career Management Point of Contact” means the GSA agency official identified by the HCA to lead the implementation of acquisition certification, warrant, training and career development programs for that organization.~~

“Contracting Officer Warrant Board (COWB)” means a group of senior-level acquisition employees within a contracting activity who receive, evaluate, and process requests for selection and nomination of contracting officers at the basic, simplified, intermediate, and senior levels.

“Contracting Officer Warrant Program (COWP)” establishes the criteria for the appointment and termination of GSA contracting officers. ~~This ensures that GSA follows a~~

~~standardized process for qualifying and appointing individuals as contracting officers based on the organization's needs for contracting authority.~~

[(b) Contracting Officials.

(1) The Head of the Contracting Activity (HCA) is ultimately responsible for managing all aspects of their respective contracting activity. Additional roles are identified throughout the FAR and GSAM to support HCAs in their responsibilities, including the Contracting Director, Advocate for Competition, and Acquisition Career Navigator (ACN). Additional resources for HCAs, Contracting Directors, Advocates for Competition and ACNs can be found on the Contracting Officials topic page on the GSA Acquisition Portal at <https://insite.gsa.gov/acquisitionportal>.

(2) HCA. A summary of HCA responsibilities include, but are not limited to:

(i) Executive oversight.

(A) Establishing and maintaining internal controls to achieve the objectives of effective and efficient operations and compliance with applicable laws and regulations;

(B) Monitoring the performance of assigned acquisition activities and acquisition programs, collecting review results, and adjusting processes with the aim of continuous improvement;

(C) Establishing infrastructure, as necessary, to support acquisition management and oversight for their workforce members, including systems required to effectively manage contract and workforce data;

(D) Managing, overseeing and integrating all members of the acquisition workforce (e.g., Leasing Specialists, Contract Specialists, Lease Contracting Officers, Contracting Officers, Contracting Officer's Representative, Program Managers, and other applicable positions) to ensure members are working effectively and efficiently as a productive team.

(ii) Operational matters.

(A) Procuring solutions, services, supplies, acquiring and divesting real property and personal property.

(1) For PBS only, also acquiring and divesting real property (including leases, site acquisition, design and construction), public utilities and real property disposal.

(2) For FAS only, also personal property disposal.

(3) Construction-related procurements.

(i) FAS contracting activities may award contracts that include ancillary commercial construction-related products and services as discussed in GSAM 512.203(c);

(ii) FAS contracting activities shall not award contracts for architect-engineering services as defined in 40 U.S.C. § 1102;

(iii) FAS and PBS shall maintain a Memorandum of Understanding (MOU) published on the GSA Acquisition Portal at <https://insite.gsa.gov/acquisitionportal> setting forth agreed-upon terms, conditions and limitations to support the acquisition of ancillary commercial construction-related products and services, including the FAS governmentwide procurement vehicles and the FSS Program;

(iv) FAS, in consultation with PBS, shall maintain an Ordering Guide published on the MAS Buyer Resources page at www.gsa.gov, or successor location, that will give specific guidance to ordering activities procuring ancillary commercial construction-related products and services through the FSS Program.

(B) Reviewing and approving procurement actions, determinations and decisions.

(iii) Policy matters.

(A) *Internal acquisition procedures.* Establishing internal acquisition and lease procurement procedures and guidance for assigned acquisition activities and acquisition programs in accordance with subpart 501.3;

(B) *Acquisition review.* Establishing internal acquisition and lease procurement procedures, and guidance concerning acquisition reviews in accordance with 504.7103;

(C) *External acquisition policy.* Collaborating with the Service-level policy organization (e.g., FAS's Office of Policy and Compliance, PBS's Office of Acquisition Management and OIA's Acquisition Policy and Workforce Division) and the Office of Acquisition Policy for acquisition and lease procurement policies, procedures, and guidance with external impact, as necessary, see subparts 501.3, 501.4 and 501.5.

(iv) Workforce career management.

(A) Implementing a Contracting Officer Warrant Program in accordance with subpart 501.6, including establishing additional limits on contracting officer warrant authorities as needed;

(B) Ensuring the acquisition workforce obtains and maintains applicable certifications and/or specialized credentials to perform the work of their position, including timely completion of continuous learning and mandatory training requirements;

(C) Ensuring adequate organizational workforce training, staffing, and career development opportunities to promote recruitment, retention and succession planning.

(v) *Redelegations.*

(A) HCA authority redelegations are limited pursuant to 502.101 and the following conditions:

(1) The SPE shall be consulted prior to a redelegation;

(2) Redelegations shall be in writing with a copy sent to the SPE at spe.request@gsa.gov; and

(3) Redelegations shall include, as applicable, the following information:

(i) HCA responsibilities being redelegated (i.e., operational matters, policy matters, workforce career management);

(ii) HCA responsibilities being retained; and

(iii) Limitations on the authority or responsibilities being redelegated.

(3) *Contracting Director.*

(i) A summary of contracting director responsibilities include, but are not limited to:

(A) Coordinating with the HCA on contracting matters as appropriate;

(B) Providing oversight of contracting officers within their acquisition program;

(C) Managing, reviewing, and evaluating their associated acquisition program;

(D) Developing, coordinating, and integrating overall plans for their acquisition program to support agency goals and objectives;

(E) Coordinating with assigned legal counsel for contracting matters as necessary; and

(F) Serving as an advisor on acquisition related matters to senior management and other offices.

(ii) *Appointment.* Appointments must be in writing with a copy sent to the SPE at spe.request@gsa.gov.

(4) *Contracting Activity Advocate for Competition.* The duties and responsibilities for Advocates for Competition are identified in FAR 6.502. Appointments must be in writing with a copy sent to the SPE at spe.request@gsa.gov.

(5) *Acquisition Career Navigator (ACN).*

(i) A summary of ACN responsibilities include, but are not limited to the following, and may vary by service:

(A) Support the HCA by managing the workforce career management responsibilities set forth in paragraph (b)(2)(iv);

(B) Serve as the primary point of contact for inquiries from or to the acquisition workforce on matters related to acquisition career management within the contracting activity;

(C) Provide guidance for the acquisition workforce utilizing the official system of record for acquisition career management and ensure consistent data integrity within the system.

(ii) *Appointment.* Appointments must be in writing with a copy sent to the SPE at spe.request@gsa.gov.]

~~(b)[(c)]~~ *Responsibilities of Acquisition Career Management Positions.*

(1) Acquisition Career Manager (ACM). * * *

(2) Administrative Warrant Issuing Agent. * * *

(3) Acquisition Career Management Points of Contact

~~(i) Pursuant to applicable HCA delegation memos, FAS, PBS and the Office of Administrative Services are responsible for establishing an infrastructure to support acquisition career management for their workforce members. The strategy and~~

~~implementation timelines for the acquisition career management infrastructure are determined by organizations according to their respective business needs and structure.~~

~~(ii) Primary points of contact for acquisition career management shall be reported to spe.request@gsa.gov within ten (10) business days of appointment or termination with the subject line "Acquisition Career Management POC".~~

~~(iii) Designated Acquisition Career Management Points of Contact will be posted to the Acquisition Career Management pages on the GSA Acquisition Portal at <https://insite.gsa.gov/acquisitionportal>.~~

[ACN. Details on ACN responsibilities can be found under paragraph (b).]

* * * * *

Subpart 501.7 – Determinations and Findings

501.707 Signatory authority.

~~—(a) The FAR frequently refers to determinations made by the agency head. Under section 309 of the Federal Property and Administrative Services Act, the Administrator authorized HCA's to act as agency head to facilitate procurement of property and services under Title III of the Act. (See GSA Delegation of Authority Manual, ADM P 5450.39C.)~~

~~—(b) An HCA normally signs a class D&F.~~

~~—(c) If a statute precludes an agency head redelegating authority, the Administrator must sign the D&F (See, for example, FAR 6.302-7).~~

* * * * *

Part 502 - Definitions of Words and Terms

Subpart 502.101 - Definitions

502.101 Definitions.

["Acquisition Career Manager (ACM)" means the GSA agency official within the Office of Acquisition Policy that has been appointed by the CAO, or designee, to lead the agency's acquisition career management programs.]

["Acquisition Career Navigator (ACN)" means an individual designated in writing by the Head of the Contracting Activity to lead the implementation of acquisition career management functions described in 501.601(b)(5). These officials serve within the limits

of their delegated authority per 501.601. Acquisition Career Navigators are identified on the GSA Acquisition Portal at <https://insite.gsa.gov/acquisitionportal>.]

“Agency competition advocate” [“Agency Advocate for Competition”] means the Director, Office of General Services Acquisition Policy, Integrity, and Workforce within the Office of Acquisition Policy.

* * *

“Acquisition Workforce (AWF)” means individuals who perform various acquisition-related functions to support the accomplishment of an agency’s mission. Acquisition, pursuant to 41 U.S.C. 403, includes, among traditional contracting functions, requirements definition, measurement of contract performance, and technical and management direction. Membership in the AWF may be on a full-time, part-time, or occasional basis.

[(a)] ~~(1)~~ Members of the AWF may include:

[(1)] ~~(i)~~ Individuals who are substantially involved in defining, determining, and managing acquisition requirements,

[(2)] ~~(ii)~~ Individuals involved in acquisition planning and strategy,

[(3)] ~~(iii)~~ Individuals who participate in the process of establishing the business relationship to obtain needed goods and services (e.g., contracting process, those involved in the solicitation, evaluation and award of acquisitions),

[(4)] ~~(iv)~~ Individuals who manage the process after business arrangements have been established to ensure that the government’s needs are met (e.g., testing and evaluating, managing and monitoring the manufacturing and production activities, auditing, contract administration, performance management and evaluation, etc.),

[(5)] ~~(v)~~ Individuals who arrange disposal of any residual items after work is complete, (e.g., property management/disposal),

[(6)] ~~(vi)~~ Individuals who support the business processes of the activities listed in this paragraph (e.g., subject matter experts), and

[(7)] Individuals who have the authority to enter into and administer leases on the Government’s behalf,

[(8)] ~~(vii)~~ Individuals who directly manage those involved in any of the activities listed in this paragraph.

[(b)] ~~(2)~~ At a minimum, the acquisition workforce of the agency, includes:

~~[(1)](i)~~ All positions in the general schedule contracting series (GS-1102), realty series (GS-1170), and other series, as identified by the Chief Acquisition Officer, Senior Procurement Executive or Head of Contracting Activity.

~~[(2)](ii)~~ All contracting officers (CO) regardless of general schedule series with authority to obligate funds above the micropurchase threshold.

~~[(3)](iii)~~ All positions in the general schedule purchasing series (GS-1105).

~~[(4)](iv)~~ Program and project managers **[involved in an acquisition.]**, ~~as identified by the Chief Acquisition Officer (CAO), the Senior Procurement Executive, or HCA.~~

~~[(5)](v)~~ All Contracting Officer's Representatives (CORs) **[and their supervisors]** or equivalent positions.

~~[(6)](vi)~~ Any significant acquisition-related positions identified by the CAO, Senior Procurement Executive or Head of Contracting Activity, or equivalent, using the guidance provided in this paragraph.

~~“Procuring activity competition advocate” means the individual designated in writing by the Head of the Contracting Activity (HCA).~~ **“Contracting Activity Advocate for Competition” means an individual designated in writing by the Head of the Contracting Activity to execute the duties and responsibilities as prescribed by FAR 6.502. Advocates for competition are identified on the GSA Acquisition Portal at <https://insite.gsa.gov/acquisitionportal>.**

* * *

~~“Contracting director” means:~~

~~(a) Except in the Federal Acquisition Service (FAS), a director of a Central Office or Regional office Division responsible for performing contracting or contract administration functions.~~

~~(b) In FAS Central Office—~~

~~——(1) The Deputy Commissioner for Technology Transformation Services or designee;~~

~~——(2) The Assistant Commissioner for the Office of Assisted Acquisition Services or designee;~~

~~——(3) The Assistant Commissioner for the Office of General Supplies and Services Categories or designee;~~

~~——(4) The Assistant Commissioner for the Office of Information Technology Category or designee;~~

~~_____ (5) The Assistant Commissioner for the Office of Professional Services and Human Capital Categories or designee; and~~

~~_____ (6) The Assistant Commissioner for Travel, Transportation, and Logistics Categories or designee; and~~

~~_____ (7) The Assistant Commissioner for the Office of Policy and Compliance or designee for support offices with contracting functions.~~

~~(c) In FAS Regions, the Assistant Regional Commissioner or designee.~~

["Contracting Director" means an individual designated in writing by the Head of the Contracting Activity responsible for performing contracting or contract administration functions as defined in 501.601. Contracting directors are identified on the GSA Acquisition Portal at <https://insite.gsa.gov/acquisitionportal>.]

* * *

~~"Head of the contracting activity~~ [Head of the Contracting Activity (HCA)]" means [the official who has overall responsibility for managing the contracting activity. These officials serve within the limits of their delegated authority per 501.601. HCAs are identified on the GSA Acquisition Portal at <https://insite.gsa.gov/acquisitionportal>.]

[(a) For GSA, the GSA Administrator has delegated the authority to] the Senior Procurement Executive (SPE);[.]

[(b) The SPE has redelegated the authority to the Chief Administrative Services Officer (CASO) and] the Commissioners and Deputy Commissioners of the Federal Acquisition Service (FAS) and the Public Buildings Service (PBS); ~~or their re-delegates.~~ [The CASO may not re-delegate the authority. The FAS and PBS Commissioners and Deputy Commissioners may re-delegate the authority down one level.]

[(c) Redelegations made by FAS and PBS are identified on the GSA Acquisition Portal at <https://insite.gsa.gov/acquisitionportal>.]

[(d) If statute, regulations or policies (e.g., FAR 6.302-7) preclude an agency head delegating authority, HCA authority remains with the GSA Administrator.]

~~The Chief Administrative Services Officer serves as the HCA for the Internal Acquisition Division within the Office of Administrative Services.~~

~~These officials serve within the limits of their delegated authority. Information on GSA's Acquisition Portal at <https://insite.gsa.gov/acquisitionportal>.~~

* * * * *

Part 506 - Competition Requirements

* * *

~~Subpart 506.5 - Competition Advocates~~

~~506.501 Requirement.~~

~~The appointment of the procuring activity competition advocate by the HCA must be communicated to the procuring staff, the agency competition advocate and the Senior Procurement Executive.~~

Part 517 - Special Contracting Methods

* * *

Subpart 517.2 - Options

* * *

517.204 Contracts.

(a) Telecommunication contracts may not exceed 10 years ~~per GSA Order ADM P 5450.39D, GSA Delegations of Authority Manual.~~

(b) Public utility contracts are limited to 10 years ([40 U.S.C. 501\(b\)\(1\)\(B\)](#)).

(c) * * *

* * * * *

Part 522 - Application of Labor Laws to Government Acquisitions

* * *

Subpart 522.3 - Contract Work Hours and Safety Standards Act

522.302 Liquidated damages and overtime pay.

(a) * * *

(b) * * *

(c) Consult **[Review 502.101]** ~~the GSA Delegations of Authority Manual, ADM P 5450.39C,~~ to determine who the agency head is for purposes of FAR 22.302(c) (Chapters 13(2)(f) and 17(5)(a)).

* * *

Subpart 522.4 - Labor Standards for Contracts Involving Construction

* * *

522.406-8 Investigations.

(a) * * *

(b) The contracting officer shall consult the **[review 502.101]** ~~GSA Delegations of Authority Manual, ADM P 5450.39C, (Chapters 13(2)(f) and 17(5)(a))~~, to determine who the agency head is for purposes of FAR 22.406-8(d).

* * *

* * * * *