

GSA ORDER

Subject: General Services Administration Acquisition Manual; GSAM Case 2020-G529, FPDS Reporting Requirements Update

1. Purpose. This order transmits a revision to the General Services Administration Acquisition Manual (GSAM) to update the requirements for contract reporting related to inherently governmental functions in the Federal Procurement Data System.
2. Background. GSAM 504.606 provides the requirements for contract reporting to the Federal Procurement Data Service (FPDS). This GSAM case was initiated to incorporate policy from GSA Acquisition Letter MV-12-03, which instructed contracting officers to provide certain additional information in FPDS reports following the award of service contracts. Language used to incorporate the policy included in MV-12-03 brings the GSAM in line with other agency's guidance on this topic and reflects the current FPDS reporting fields.
3. Effective date. Date of Signature.
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 non-regulatory language of the following GSAM section, changes summarized below:

504.605 Procedures

Updates the list of "Activity Address Codes" table to reflect the Technology Transformation Service's incorporation into the Federal Acquisition Service.

504.606 Contract Reporting

Adds a new paragraph (d) to instruct contracting officers to enter the appropriate indicator ("Closely Associated," "Critical Functions," or "Other Functions") in the Inherently Governmental Functions field in FPDS reports.

5. Cancellation: Acquisition Letter MV-12-03 is hereby cancelled.
6. Point of contact. For clarification of content, please contact Mr. Tanner Slaughter, GSA Acquisition Policy Division, at gsarpolicy@gsa.gov.

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Office of Government-wide Policy

**ATTACHMENT A
GSAM Text, Line-In/Line-Out**

GSAM Baseline: Change 108 effective 04/30/2020

- 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 504—Administrative Matters

Subpart 504.6—Contract Reporting

504.605 Procedures.

(d) *Activity Address Codes (AACs).*

(1) AACs are made up of the following:

- (i) The first two characters of the AAC must be “47” to identify GSA.
- (ii) The third character must be the service/office code identified as follows:

Service/Office Code	Letter Designation
***	***
Federal Acquisition Service	Q
***	***
Technology Transformation Service	‡
***	***

504.606 Contract Reporting.

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(a) *Reporting requirements.* Detailed specification of FPDS data reporting requirements is contained in the FPDS-NG FAQs document (available at https://www.fpds.gov/wiki/index2.php/FPDS-NG_FAQ). Reporting offices are encouraged to use automated information systems for FPDS data reporting, provided that the systems contain all required FPDS data elements via the machine-to-machine process and the automated acquisition system has received the proper certification from the FPDS system manager.

* * *

[(d) *Inherently Governmental Functions.* If the procurement is for services, enter the appropriate indicator in the Inherently Governmental Functions field:

(1) “Closely Associated” means functions that are closely associated with inherently governmental functions; those contractor duties that could expand to become inherently governmental functions without sufficient management controls or oversight on the part of the Government. Office of Federal Procurement Policy (OFPP) Policy Letter 11–01, Performance of Inherently Governmental and Critical Functions, provides examples of work that is inherently governmental and therefore must be performed by Federal employees and work that is closely associated with inherently governmental functions that may be performed by either Federal employees or contractors.

(2) “Critical Functions” means functions that are necessary to the agency being able to effectively perform and maintain control of its mission and operations. Typically, critical functions are recurring and long-term in duration.

(3) “Other Functions” means neither “Closely Associated Functions” nor “Critical Functions.”

(4) For services that include performing both “Closely Associated” and “Critical Functions,” select “Closely Associated, Critical Functions.”]

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