

## **GSA ORDER**

Subject: General Services Administration Acquisition Manual; GSAM Case 2020-G527,  
Update References to Construction GSA Form 184

1. Purpose. This order transmits a revision to the General Services Administration Acquisition Manual (GSAM) that clarifies that GSA's construction management contractors (CMs) may, in most cases, complete GSA Forms 184, 184A, and 184B. The update also makes editorial changes to the general language regarding forms.
2. Background. Per FAR 52.232.5 and GSAR 552.232-5, GSA Forms 184, 184A and 184B are prepared to document satisfactory progress of work prior to processing progress payment requests from construction contractors. On occasion, CMs, separately contracted by GSA to oversee construction projects, complete these forms. This is permissible if the CM is authorized to act on behalf of GSA to obtain the information necessary to complete the Forms and is, thus, considered an agent of GSA.

The information collected on GSA Forms 184, 184A, and 184B is exempt from the Paperwork Reduction Act (5 CFR 1320.3(h)(3)) if the information used to complete the Forms is "obtained through direct observation by an employee or agent of [GSA] or through non-standardized oral communication in connection with such direct observations." Therefore, an Information Collection Reference Number is not required as long as the Forms are only filled out by GSA employees and agents of GSA.

While construction contractors are generally not considered agents of GSA, when CMs are authorized to act on behalf of GSA to obtain the information necessary to complete GSA Forms 184, 184A and 184B, they may be considered agents of GSA and may, therefore, complete these Forms.

3. Effective date. April 22, 2021.
4. Explanation of changes. This amendment includes non-regulatory changes only. For full text changes of this amendment see Attachment A, GSAM Text Line-In/Line-Out.

This amendment revises the non-regulatory language of GSAM Subparts 532.1 and 553.3 as summarized below:

Subpart 532.1 - amended to add section 532.103, Progress payments under construction contracts, to establish the requirement for the completion of GSA Forms 184, 184A, and 184B by Government personnel or agents of GSA to document satisfactory progress of work prior to processing progress payments.

Subpart 553.3 - amended to add new references to GSA Forms 184, 184A, and 184B; Subpart and section titles changed to match the titles in the Federal Acquisition Regulation (FAR); minor editorial changes and deletion of outdated language for clarity; correction made to title of GSA Form 1611 in table.

5. Point of contact. For clarification of content, please contact Mr. Tanner Slaughter or Mr. Alexander Beyrent, GSA Acquisition Policy Division, at [gsarpolicy@gsa.gov](mailto:gsarpolicy@gsa.gov).

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

**GSAM Baseline: Change 123 effective 03/15/2021**

- 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 532—Contract Financing**

**Subpart 532.1—Non-Commercial Item Purchase Financing**

[532.103 Progress payments under construction contracts.

GSA Form 184 and, to the extent necessary, GSA Forms 184A and 184B, shall be prepared by Government personnel or agents of GSA to document satisfactory progress of work prior to processing each progress payment request submitted by the construction contractor in accordance with FAR 52.232-5 and 552.232-5. Generally, construction contractors are not considered agents of GSA. Certain other contractors, including, but not necessarily limited to, construction management contractors (CMs), however, may be considered agents of GSA if they are authorized to act on behalf of GSA to obtain the information for the referenced forms.]

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**Part 553—Forms**

**Subpart 553.3—[Forms Used in Acquisitions]Illustrations of Forms**

**553.300 [Listing of Standard, Optional, and Agency forms]Scope of subpart.**

~~[(a) ]This subpart [lists]illustrates standard and GSA forms prescribed or referenced in Parts 501–551 and 571. Instructions on completing a form, if included, are identified by the suffix “I” after the GSAR section number.~~

~~**553.300-70 Forms not illustrated.**~~

~~[(b) ] This subpart does not [list]illustrate either:~~

~~(a) S[s]tandard forms [listed]illustrated in the FAR.~~

~~(b) Forms available on line.~~

~~[(c) ] You can a[A]ccess the forms listed below on the GSA Forms Library at <https://www.gsa.gov/forms>.~~

Form No.	Title	Reference[(s)]
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Standard Form 33	Solicitation, Offer, and Award	514.201-2
<b>[GSA Form 184</b>	<b>Construction Progress Report</b>	<b>532.103</b>
<b>GSA Form 184A</b>	<b>Construction Progress Report (Work Branch Breakdown)</b>	<b>532.103</b>
<b>GSA Form 184B</b>	<b>Construction Progress Report (Change Order Breakdown)</b>	<b>532.103]</b>
GSA Form 300	Order for Supplies and Services	513.302-70(b), 505.503, 570.502-2
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GSA Form 1611	<b>[Application for Shipping Instructions and Notice of Availability]</b> <del>552.238-107</del>	552.238-107
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