

## Contract Writing Systems issues:

This document is intended for contract writing system (CWS) providers and the federal agency managers overseeing those providers. Not every issue may apply to every CWS, but this document outlines the more critical and widespread issues.

CWS providers are required to attend the General Services Administration (GSA) Integrated Acquisition Environment (IAE) Technical Interface Community (TIC) meetings in order to gain insight into upcoming changes with the IAE systems.

The governmentwide acquisition community, in response to on-going issues with CWS, will start sharing information regarding the CWS providers in relation to their adherence to policy, process standards, timeliness in implementing system changes, interaction with IAE systems, etc.

CWS providers should be especially cognizant of timeliness of implementations. Clause changes for example, should not take more than 30 days to process. Changes to standard forms should occur at the time the new form is required for use. Changes to IAE APIs, systems, and extracts should not be left to the last minute before the current version is deprecated but instead be adopted as soon as available.

CWS providers should be interacting with customer agency acquisition policy, GSA IAE, and especially Procurement Committee for E-Government representatives to ensure their systems are operating as expected.

The below is only an initial list of identified issues with CWS.

- 1.) Automatically requiring FPDS contract action reports for contract with a lifetime total estimated cost under the micro purchase threshold (MPT). This is an agency policy decision, but must be seriously considered since many of the FPDS elements only apply when the MPT is exceeded
- 2.) Using the parent award solicitation issue date for task\delivery order\Blanket Purchase Agreement (BPA) call solicitation issue date. When the solicitation date is collected in FPDS, it is for the specific award being reported, not the parent indefinite-delivery vehicle(IDV). The FPDS data dictionary spells out what date should be used in scenarios where there is no solicitation issued.
- 3.) Using the effective date instead of period of performance start date for FPDS reporting.
- 4.) Not removing non-appropriated funds from FPDS totals. Non-appropriated funds are not required to be reported to FPDS and the CWS should be able to remove those funds from the obligation amounts reported to FPDS.
- 5.) Not displaying the correct dollar amounts on the standard forms. Providers must use the acquisition.gov website under data initiatives and review the guide on standard forms and dollar amounts.
- 6.) Not fully utilizing APIs made available by the GSA\IAE. For example, the FPDS Correct API allows for corrections to be made, but CWS providers are not utilizing this functionality causing agencies to have to login manually to make corrections.
- 7.) Not allowing linking to an FPDS CAR created outside of the CWS.
- 8.) Not using the Product Service Code (PSC) API. Uploading PSC changes from a spreadsheet or a pdf is time consuming and ineffective. The PSC API must be used to ensure the latest information is available for use as soon as possible.
- 9.) Not updating vendor tables appropriately from SAM.gov and instead just using vendor information stored locally. The latest vendor update to their registration should be available to the Contracting Officer (CO) for potential modifications or for a new award. Waiting 30 days to process a vendor update from SAM.gov causes data quality issues and is not an accurate reflection of the legal registration. When the CWS does not have the most up to date information, the government is put at risk for any resulting prompt payment interest penalties.

- 10.) Not updating Federal Acquisition Regulation (FAR) clauses or other changes in a timely fashion (this should not take longer than 30 days). Providers should be using the following to update FAR clauses: <https://github.com/GSA/GSA-Acquisition-FAR>
- 11.) Not using IAE system APIs at all/incorrectly/or not timely: Providers still using extracts despite there being no agency technical restrictions on using APIs. Not using the latest APIs. Waiting for months after a new API is issued before adopting its use is not the correct process.
- 12.) Not updating the FPDS date signed field on execution of the award\mod.
- 13.) Only presenting an exclusion flag and not the exclusion effect.
- 14.) Allowing users to bypass FPDS reporting without a corresponding means of oversight (e.g., a report of those actions).
- 15.) Not mapping FPDS data elements correctly. Provider should be referring to the FPDS data dictionary or contacting the PCE representative.
- 16.) Defaulting the multi-award IDV filed to No. This causes significant downstream reporting impacts for orders placed against multi-award IDVs that are wrongly reported as single awards.

#### FPDS CWS to FPDS data element mapping:

##### FPDS CAR creation\correction\closeout-

- CWS should not require that an FPDS CAR be required for every contract action. Only those with a lifetime total estimated cost exceeding the MPT threshold are required to be reported (see the FPDS FAQs and refer to agency policy). CWS must ensure their configuration allows for this setting.
- Any CWS that allows contract actions exceeding the MPT to not have a corresponding CAR must have a mechanism in place, such as a report, to allow oversight as to why these were not reported.
- CWS must allow for a CAR to be corrected within the CWS itself. FPDS has a correct API. Corrections are not modifications. Corrections should be used when a mistake is made within FPDS but the CWS information is correct.
- CWS must allow for a CAR created outside the CWS within FPDS to then be linked to the contract action in the CWS.
- CWS must allow for use of the closeout button functionality for multiple contract actions, i.e., mass closeout.

##### FPDS Date signed:

- The date signed equates to when the award or modification was executed. It should match the date provided on the Standard Form and if money is obligated on the action, should also align to the date the funds were obligated.

##### FPDS Period of Performance Start Date:

- This date should align to the period of performance start date, not the effective date. The period of performance start date may not necessarily be the date signed or the effective date. The effective date should not be pre-filling this information

##### FPDS Solicitation Issue Date:

- This date MUST NOT pull from the parent award solicitation on task\deliver orders or BPA Calls. This field is required when the total estimated value of the contract is over the SAT.

##### FPDS Dollar Amounts:

- If dollar amounts are to be pre-filled from the CWS to FPDS, then the correct dollar amounts must be used.
- Non-Appropriated funds should not be reported to FPDS in accordance with FAR Subpart 4. The CWS must allow for those funds to be identified and removed from FPDS reporting on a CAR.
- Handling of Option to Extend Services 52.217-8. Many agencies have policies regarding the use of the option to extend services and therefore, these policies may impact how this particular option should be reported to FPDS (i.e., the option amount is not included in the Base and All Options amount until it is obligated). The CWS must allow for this handling of this particular option.
- CWS must handle all dollar amount additions and changes in accordance with FPDS and functional requirements. Providers should contact the PCE representative to ensure the system is appropriately being reported.