



ACQUISITION,
TECHNOLOGY
AND LOGISTICS

OFFICE OF THE UNDER SECRETARY OF DEFENSE

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JUL 27 2012

MEMORANDUM FOR COMMANDER, UNITED STATES SPECIAL OPERATIONS
COMMAND (ATTN: ACQUISITION EXECUTIVE)
COMMANDER, UNITED STATES TRANSPORTATION
COMMAND (ATTN: ACQUISITION EXECUTIVE)
ASSISTANT SECRETARY OF DEFENSE, LOGISTICS AND
MATERIEL READINESS
DEPUTY ASSISTANT SECRETARY OF THE ARMY
(PROCUREMENT)
DEPUTY ASSISTANT SECRETARY OF THE NAVY
(ACQUISITION AND PROCUREMENT)
DEPUTY ASSISTANT SECRETARY OF THE AIR FORCE
(CONTRACTING)
DIRECTORS OF THE DEFENSE AGENCIES
DIRECTORS OF THE DOD FIELD ACTIVITIES

SUBJECT: System for Award Management Phase I Implementation

As you are aware, the General Services Administration (GSA) plans to implement Phase I of System for Award (SAM) on July 29, 2012. Phase I includes the functional capabilities of the current Central Contractor Registration (CCR), Federal Agency Registration (FedReg), Online Representations and Certifications Application (ORCA), and Excluded Parties List System (EPLS) legacy applications. Upon implementation, these legacy applications will be retired, and going forward the capabilities regarding entity registration, representations and certifications, and exclusions will be accomplished via SAM at www.sam.gov. In addition to the functional improvements this consolidation brings, it is also a significant step to achieving the Government Accountability Board's identified objectives. Thank you for your representatives' efforts to prepare your components for these changes.

In preparation for SAM, be aware that, in addition to the new 'look and feel' users will experience, there are several significant improvements that are being deployed:

- Registering entities will now only be required to answer questions that apply for the specific reason they are registering (e.g., contracts or financial assistance). For example, entities registering only to participate in federal financial assistance opportunities will no longer be asked to provide all the additional data potential contractors are asked to provide in accordance with the Federal Acquisition Regulation (FAR). Entities registering for just financial assistance actions will only be required to provide 'core' data and certain points of contact (POC) information.
- The legacy registration processes in CCR and ORCA are combined in SAM for entities registering for contract actions. In addition to providing core and POC data during registration, potential contractors will also be asked for certain data (such as the North American Industrial Classification System (NAICS) code(s) in which they normally do

business and size information) and complete the provisions identified in FAR subpart 4.1202 and Defense FAR Supplement (DFARS) subpart 204.1202.

- Users will, for entity registrations for contracts, be able to see the entity's represented size status in accordance with FAR 52.212-3 and 52.219-1 (based on the 'Total Receipts' and 'Average Number of Employees' data it entered) for not just the NAICS codes in which the entity indicates they normally do business; but for every NAICS code for which the Small Business Administration (SBA) establishes thresholds.
- Users will, for entity registrations for contracts, be able to identify if the SBA has, in accordance with FAR subpart 19.302, determined the small business status for any NAICS code to be different from what the entity represented.
- Users will, when searching SAM to ensure registration, also be able to identify if the entity has been excluded from procurement and/or non-procurement awards. The Cause and Treatment (CT) codes used in EPLS have been translated to plain language instructions for application to procurement and non-procurement actions.

Note that the distinct registration purpose (contracts and/or financial assistance) does require our workforce to ensure that when reviewing SAM to ensure a contractor is registered (in accordance with FAR subpart 4.11), they ensure they have registered for 'contracts' so that all required data has been provided (see the attached instructions).

These improvements are explained in more detail in the SAM User Guide and other GSA-provided training materials in the Help area at www.sam.gov. In addition, watch the DPAP website in the eBusiness section (<http://www.acq.osd.mil/dpap/pdi/eb/index.html>) for other DoD presentations and materials as they are developed. Also, be advised that the FAR, DFARS, and DFARS Procedures, Guidance and Information (PGI) are all being updated to reflect SAM instead of the specific legacy systems' names and processes.

Please ensure that your workforce is made aware of the improvements identified in this memo. As the implementation of any new system faces challenges, I want to thank you in advance for your workforce's patience during the initial days after July 29th. Any questions regarding the SAM capabilities discussed herein may be directed to Lisa Romney, lisa.romney@osd.mil or 703-588-0627.


Richard Ginman
Director, Defense Procurement
and Acquisition Policy

Attachment:
As stated

cc: Director, Office of Small Business Programs

ATTACHMENT

INSTRUCTIONS FOR IDENTIFYING A SAM ENTITY REGISTERED FOR CONTRACTS

The implementation of the System for Award Management (SAM), among other changes, brings together the capabilities of the former Central Contractor Registration (CCR) and Online Representations and Certifications Application (ORCA). Existing registrants with both a CCR and ORCA record will have their records combined into one SAM record. Once implemented (scheduled for July 29, 2012), new registrants in SAM and existing registrants that enter SAM to update/renew their record will be asked to identify if they wish to be considered for federal contracts. If they indicate yes, then they will be required to complete the provisions associated with the annual representations and certifications identified in Federal Acquisition Regulation (FAR) subpart 4.1202 and Defense FAR Supplement (DFARS) subpart 204.1202.

In order to ensure that a prospective contractor is compliant with the registration requirements of FAR subpart 4.11, contracting officers shall check SAM in the following manner:

- Perform a search in SAM for the vendor's DUNS at www.sam.gov (see the posted User Guide for detailed instructions on using the search capability).
- If no records are returned for the vendor's DUNS, the vendor is not actively registered in SAM.
- If a corresponding record identified as 'Entity' is returned, click 'View Details' to open the vendor's dashboard.
 - If the annual renewal date shown on the dashboard is July 31, 2013 or earlier; the vendor's record was migrated from CCR. **Consider these vendors actively registered in accordance with FAR subpart 4.11.** You may review the vendor's record in detail by using the navigation bar on the left side of the screen and click through the Entity Record sections. Note that there will only be information in the Representations and Certifications section if the vendor also had a record that was migrated from ORCA.
 - If the annual renewal date shown on the dashboard is August 1, 2013 or later; the vendor has accessed their record since SAM was implemented (either to enter a new registration or to renew or update a previous record). Review the Representations and Certifications section (either in the dashboard or in detail using the navigation link).
 - If there is data provided in the Representations and Certifications section, the vendor has registered for contracts and **can be considered actively registered in accordance with FAR subpart 4.11.**
 - If there is no data provided in the Representations and Certifications section, the vendor has not completed all the information necessary to be registered for contracts and **shall not be considered actively registered in accordance with FAR subpart 4.11.**
- Note: When conducting a search in SAM (using any search criteria (e.g., DUNS number, name), if a record is returned with an 'Exclusion' indicator, this means that the entity is has an active debarment, suspension, or other exclusion applicable. The user may click 'View Details' for additional information and to see the applicability for procurement and non-procurement actions. See FAR Subpart 9.4 for specific process requirements regarding excluded parties.