
Procure-to-Pay Capability Summary

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SUBJECT: Requiring Representations and Certifications in the System for Award Management

POLICY: Federal Acquisition Regulations (FAR) Part 4.11 requires prospective federal vendors (e.g. those responding to a Request for Quote or Proposal) to be registered in the System for Award Management (SAM) in order to increase visibility of vendor sources and to establish a common source of vendor data for the government. In FY2012, the federal government added the requirement to collect vendor representations and certifications as part of this registration (see FAR 4.12). This eliminated the administrative burden for contractors by establishing a common source for this information to procurement offices across the Government, and allowed for the incorporation by reference of the contractor's representations and certifications in the awarded contract. The Director, Defense Pricing and Contracting, released a memo in July of 2012 establishing the requirement to enter reps and certs in SAM if the registrant wished to be considered for federal contracts. As of FY19, representations and certifications were also required for those registering in SAM to receive grants and other federal financial assistance.

INFORMATION TECHNOLOGY INFRASTRUCTURE: Prospective vendors are required to complete electronic annual representations and certifications in SAM, found at <https://www.sam.gov>. The site provides a series of interactive questions which results in a complete set of representations and certifications that are saved as part of the vendor's SAM registration.

Registrants are required to review and update the information as necessary, but at least annually, to ensure they are kept current, accurate, and complete. The representations and certifications are effective until one year from the date of submission/update.

The data in SAM is archived and electronically retrievable via application programming interfaces (APIs).

IMPACT: Centralizing the representations and certifications in SAM dramatically reduces burden on contractors (who formerly were required to submit this information with every solicitation response), improves data quality by having a standard, centralized collection and dissemination mechanism, and reduces the burden on contracting officers when capturing reps and certs for contract files.

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Additional information on the SAM extracts and APIs can be found at <https://open.gsa.gov/api/>