



Standard Operating Procedure (SOP) for the Procurement Integrated Enterprise Environment (PIEE) Records Retention & Destruction

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1 Purpose

This document provides an overview of the business rules and Standard Operating Procedures (SOP) used for records retention and destruction within the Procurement Integrated Enterprise Environment (PIEE). The ability to destroy records, and their associated documents and data, after their records retention period has passed is crucial for the success of the procurement community as it decreases the amount of antiquated data within PIEE, enables regulatory compliance, supports meeting audit requirements, and reduces the Government's overall legal liability.

This document bases its findings on requirements in the Federal Acquisition Regulations (FAR), Defense Federal Acquisition Regulation Supplement (DFARS), Financial Management Regulations (FMR), and National Archives and Records Administration (NARA). Should any conflicts exist between this document and any of those listed above, any formal policy documentation – FAR, DFARS, FMR, & NARA – is the prevailing Government regulation.

2 Applicability

This document will address records retention and destruction for documents and data within PIEE for Award Files (including Contracts, Orders, Grants and other Assistance Files), Micro-Purchase Card Receiving Reports (not associated with an award), Miscellaneous Payments, Government-to-Government Property Transfers, Cancelled Solicitations, Transportation Documents, and Purchase Requests (i.e. MIPRs and eMIPRs). See appendix A and appendix B for the PIEE modules that contain documents and data that are impacted by records retention and destruction business rules.

3 Background

PIEE includes applications spanning the procurement process from the creation of a purchase request through contract closeout, and stores documents and data on solicitations, awards, invoicing, payment, government property, closeout, and other procurement processes for contracts, grants, and miscellaneous payments.

With the PIEE 6.0 release, June 2019 the Electronic Data Access (EDA) system (previously Electronic Document Access) became the online repository for contractual instruments and supporting documents, and is the Department of Defense's (DOD) authoritative source for electronic distribution of contract documents and data.

To enable compliance with the records retention requirements stated in the FAR, DFARS, FMR, NARA and other applicable policies (see Section 6, Internal Controls), a systematic records retention and destruction policy will be implemented for documents and data within PIEE.

I. Awards

a. Contract Files

According to the FAR 4.801 (listed as the authoritative source for contract files in the FMR Volume 1, Chapter 9), a contract file is the combination of files from the various offices that oversee the lifecycle of the contract. In general, the head of each office performing contracting, contract administration, or paying functions manages the establishment of their own records of all contractual actions. The documentation of the combined file is enough to cover the complete history of the transaction including:

- A complete overview of the acquisition process
- Any supporting actions taken
- Information for reviews, investigations, or any legal or congressional inquiries

FAR 8.402 states the multiple responsibilities of each office in more detail. The contracting office's portion of the contract file documents the basis for the acquisition and the award, the assignment of the administration office, the Contracting Officer's Representative (COR) and any subsequent actions taken by the contracting office. The contract administration office records any actions that fall under their responsibility identified in FAR 42 and DFARS 242. The paying office maintains all files pertaining to contract payments. Normally, these three distinct entities are kept separate, however, any or all files may be combined if any or all functions are performed by the same office. A complete listing of the contents of a contract file by office type is outlined in FAR 4.803. The files produced by these offices can be retained in any medium according to FAR 4.802.

DFARS 204.802 states that any document posted to the EDA system is officially part of the contract file and can be shared with personnel who have the authority to review the records.

In general, each agency has prescribed procedures for the handling, storage, and disposal of contract files in accordance with the NARA General Records Schedule (GRS) 1.1, Financial Management and reporting records. Table 4-1 of FAR 4.805 describes in more detail the retention periods for various records.

Record	Retention Period
(Contracts (and related records or documents, including successful and unsuccessful proposals, except see paragraph (c)(2) of this section regarding contractor payrolls submitted under construction contracts).	6 years after final payment.
Files for canceled solicitations.	6 years after cancellation.

Figure 1: Records Retention Policy in FAR 4.805 Table 4-1 Related to PIEE Records

Although the DFARS 204.805 outlines the retention period for which contract files must be retained in GRS 3 (Procurement, Supply, and Grant Records) and GRS 6 (Accountable Officers' Accounts Record). These have been superseded by GRS 1.1. Component specific record retentions may be established in component policy supplements.

b. Assistance Files

According to NARA GRS 1.2, grants and cooperative case files should be retained for 10 years for successful applications. Records included in these types of case files include, but are not limited to:

- Application, forms, and budgets
- Evaluation reports, panelist comments, review ratings or scores
- Notice of Grant Award or equivalent and grant terms and conditions
- State plans, if any (submissions from states that assure compliance with all applicable Federal statutes and regulations in effect with respect to the period for which the State receives funding)
- Funding amendment requests and actions, if any
- Periodic and final performance reports (progress, narrative, financial)
- Audit reports and/or other monitoring or oversight documentation
- Summary reports and the like

Grants and cooperative agreement records related to financial transactions are covered by GRS 1.1. If a Component believes that certain case files warrant permanent retention, a records retention schedule must be submitted to NARA, via their DoD Component Records Officer. A list of DoD Records Officers can be located on the NARA website at <https://www.archives.gov/records-mgmt/agency/departments/defense.html>.

II. Documents Not Associated with an Award

a. Miscellaneous Pay

Requirements for records retention periods for Miscellaneous Payments can be found in the DoD Miscellaneous Payments Guidebook, identified as the authoritative source for records retention of Miscellaneous Payments in the DoD FMR Volume 1 Chapter 9, and references NARA requirements. Miscellaneous Payments documents and data shall be retained in PIEE for 10 years.

b. Canceled Solicitations

The records retention for Canceled Solicitation is established in the FAR 4.805, see Table 4-1 (3) above. Canceled Solicitations documents and data shall be retained in PIEE for 6 years.

c. Other Records

Records retention for Purchase Requests not associated with a contract, Micro-Purchase Card Receiving Reports, Government-to-Government Property Transfers, and Transportation documents and data in PIEE shall be managed in accordance with the FMR Volume 1 Chapter 9 and retained in PIEE for 10 years.

d. Reports and Derived Data

Reports and data derived from PIEE records that are used for purposes such as trend analysis, past performance, historical pricing, will be retained for as long as needed to support the required business process.

4 Procedures

Using a retention timeframe parameter derived from NARA GRS 1.1 and 1.2, FAR 4.805, DOD FMR Volume 1 Chapter 9, and component policy supplements, the PIEE Records Retention & Destruction capability analyzes the data stored in PIEE to determine when the records retention period will start for each record based on the record type, and will proceed to retain the record's associated documents and data for the required period of time. Appendix C provides a summary of each record type and its associated retention period.

After the retention period for a given record has passed, the documents and associated data for that record are permanently destroyed from PIEE. Simultaneously, a data artifact is created in PIEE for each destroyed record that contains the minimum viable set of data to identify that the record once existed in PIEE, largely for historical and audit purposes. The data elements retained as a record of destruction for each record type are listed in Appendix D. PIEE Records Retention & Destruction reports are available for Components to identify which records have been destroyed, which records are within their retention period and approaching their destruction date, and which records have been excluded from destruction. The PIEE Records Retention & Destruction & Exclusion Reports are self-service, able to be exported from PIEE, and can be accessed in EDA by users with 'Advanced Reporting' or 'Data Manager' roles in PIEE.

The PIEE Records Retention & Destruction capability includes the ability to establish a records retention period at the business process and component level to allow for flexibility in determining when a document should be destroyed. If a record is required to support an investigation, litigation, protest, or appeal, exclusions will remain in place until the applicable Component POC provides notification of completion of the investigation, litigation, protest, or appeal. Instructions for adding and removing records from the exclusion list can be found in Appendix E.

I. Awards and Related Documents & Data

An award's (contract, order, grant or other assistance agreement) closeout date is used to determine the initiation of the award's records retention period. For awards using Standard Form (SF) Form 44 pocket size purchase order form, designed for on-the-spot, over-the-counter purchases of supplies and non-personal services while away from the purchasing office or at isolated activities or areas, the closeout date will be the order date on the document in accordance with FAR 4.804-1(a)(1).

All documents and data within PIEE associated with an award, including but not limited to modifications, invoices, receiving reports, solicitations, Contracting Officer Representative appointment and surveillance records, purchase requests, and closeout, shall follow the records retention and destruction business rules for awards and will be destroyed at the same time as the award. Appendix F lists all documents and data associated with an award.

Records external to PIEE can be imported into the system at or after contract closeout to fulfill the requirements of short-term and long-term records retention and disposal and to meet the requirement of DFARS 204.804(3) that contract records be available locally for 12 months after completion. Local offices should dispose of records redundant in PIEE in accordance with their Component records management policies and procedures.

II. Documents & Data Not Associated with an Award

Records in PIEE that are not associated with an award leverage a variety of record-specific dates to trigger the start date of their respective records retention periods. Appendix G outlines the date to be used to indicate the records retention start date. Local offices should dispose of working copies or records redundant with PIEE at closeout.

5 Roles and Responsibilities

I. Components

- Provide timely contract completion statements for awards, which are used to establish the records retention start date for contracts, grants and other assistance.
 - Additional guidance on contract closeout can be found in the Contract Closeout Guidebook and the Handshake 9 SOP.
 - Contract Closeout Guidebook:
http://dodprocurementtoolbox.com/cms/sites/default/files/resources/2019-11/Contract%20Closeout%20Guidebook_20191025_Final.pdf
 - Handshake 9 SOP:
https://www.acq.osd.mil/dpap/pdi/p2p/docs/Handshake_9_SOP_20200109.pdf
- Dispose of local record files as required by the FAR and DFARS and in accordance with Component records management policies and procedures.
- Designate a primary point of contact (POC) who will participate in training and implementation of PIEE Records Retention & Destruction capabilities.
- Identify records that should be excluded from PIEE Records Retention & Destruction on an ongoing basis and coordinate with the PMO to formally submit exclusions requests based on the instructions set forth in Appendix E.
- Raise awareness to the PMO if there are policy changes that support a change to PIEE Records Retention & Destruction business rules, and provide the appropriate documentation to the PMO at PIEE_Rec_Retention@dla.mil. Request to modify records retention periods are to be submitted to PMO for PIEE via the DoD Component Records Officer, provide the appropriate documentation to the PMO at PIEE_Rec_Retention@dla.mil.

II. Program Management Office (PMO) for PIEE

- Implement all DoD records retention and destruction policy and procedures in PIEE as outlined in this SOP.
- Ensure that the capabilities for records retention, records destruction, and the creation of destruction records are working effectively for all record types.
- Take action in implementing the exclusion process for PIEE Records Retention & Destruction as described in Appendix E.
 - Ensure that records identified by the Components for exclusion from destruction are added to the exclusions list appropriately.
- Communicate all change requests to business rules for PIEE Records Retention & Destruction from the Components to Defense Pricing & Contracting (DPC).
- Maintain Records Destruction Reports in EDA.

III. Defense Pricing and Contracting (DPC)

- Establish PIEE Records Retention & Destruction business rules and communicate business processes with the Components and PMO through PIEE governance.

6 Policy

- FAR 4.801 - 4.805
<https://www.acquisition.gov/content/part-4-administrative-matters#i1122317>
- DFARS 204.802 & 204.805
https://www.acq.osd.mil/dpap/dars/dfars/html/current/204_8.htm
- FMR Volume 1, Chapter 9
https://comptroller.defense.gov/Portals/45/documents/fmr/current/01/01_09.pdf
- NARA General Records Schedule 1.1 and 1.2
<https://www.archives.gov/records-mgmt/grs.html>
- DoDI 5015.2 DoD Records Management Program
<https://www.esd.whs.mil/Portals/54/Documents/DD/issuances/dodi/501502p.pdf>
- Department of Defense Grant and Agreement Regulations (DODGARs)
<https://www.govinfo.gov/content/pkg/CFR-2011-title32-vol1/xml/CFR-2011-title32-vol1-subtitleA-chapI-subchapC.xml>
- DoD Miscellaneous Pay Guidebook
<https://www.dfas.mil/contractorsvendors/miscpaymentguide.html>

Appendix A: PIEE Modules Impacted by Records Retention & Destruction

- Enterprise Data Access (EDA)
- Contracting Communication Module (CCM)
- Contract Closeout (CCO)
- Contract Deficiency Report (CDR)
- electronic Military Interdepartmental Purchase Request (eMIPR)
- Government Furnished Property (GFP)
- Joint Appointment Module (JAM)
- MyInvoice
- National Industrial Security Program (NISP) Contract Classification System (NCCS)
- Purpose Code Management (PCM)
- Solicitation Portal
- Surveillance and Performance Monitoring (SPM)
- Wide Area WorkFlow (WAWF)
- Item Unique Identification (IUID) Registry

Appendix B: IUID Registry

The Item Unique Identification (IUID) registry consist of two different types of records, Government Furnished Property (GFP) records and the Registry of IUIDed assets.

Most GFP records have been transferred to the GFP Module which has taken over the function of recording information about GFP assets. All new GFP receipts, transfers, losses, and other actions will reside in the GFP Module. For legacy GFP records in the IUID registry, DPC will work with the components to screen the records and develop a process for transferring the records to the GFP module or disposing of the records based on the records retention status of the associated contract.

For the asset records in the IUID Registry, the General Records Schedule 1.1, item 30 states that the records should be destroyed 2 years after the asset is disposed of and/or removed from agency's financial statement. At this time there is no standard process for Accountable Property Systems of Record (APSRs) to identify to the IUID Registry that IUIDed assets have been destroyed or removed from component financial statements.

Therefore, to ensure that the IUID asset records are available to support the needs of the Department of Defense, the IUID Registry asset records shall be kept indefinitely, until an automated process for identifying asset disposal is implemented in PIEE.

Appendix C: Records Retention Periods by Record Type

Document	Period
Contracts and Orders	6 Years
Canceled Solicitations	6 Years
Service Unique Retention Policy	# Years
Grants and Assistance Agreements	10 Years
Micro-Purchase Card Receiving Reports	10 Years
Miscellaneous Payments	10 Years
Purchase Requests (Not associated with an Award)	10 Years
Government-to-Government Property Transfers	10 Years
Transportation Documents	10 Years

Appendix D: Document Destruction Data Maintained in PIEE

Data Elements	Awards	Micro-Purchase Card Receiving Report	Miscellaneous Payments	Purchase Requests	Government-to-Government Property Transfers	Transportation Documents	Canceled Solicitations
Award Number	x	x					
Delivery Order Number	x						
Document Number			x	x		x	x
Modification Number						x	
Signature Date	x		x	x	x		x
Issue DoDAAC	x		x				
Admin DoDAAC	x		x				
Pay DoDAAC	x		x				
CAGE Code	x		x				
DUNS Number	x		x				
From				x	x		
To				x	x		
Shipment Number					x		
Shipment Date					x		
Closeout Date/Records Retention Start	x	x	x	x	x	x	x
Destruction Date	x	x	x	x	x	x	x

Appendix E: Procedure for Requesting an Exclusion to Destruction

- PIEE Records Retention and Destruction will be rolled out in the phased approach below. For the first 3 phases, the PMO will generate a list of records with a destruction date within a specific time frame. This data will be provided to DPC 60 days prior to each phase of implementation. The table below outlines the target schedule for the 4 phases of implementation.

Phase	Records Retention Threshold	Target Destruction Date
Phase 1	Records retention start date of September 30, 2003 and prior past their records retention period	July 31, 2020
Phase 2	Records retention date of October 1, 2003 - September 30, 2009 past their records retention period	August 31, 2020
Phase 3	Records retention date of October 1, 2009 - September 30, 2014 past their records retention period	September 30, 2020
Phase 4	Fully automated records retention occurs on a rolling basis once the records retention period has passed	January 1, 2021

- DPC will review and distribute the records retention report to Component Leads (Level II Group Administrators) along with the PIEE Records Retention & Destruction Exclusion Request Form and Instructions.
- Components will designate a lead POC for submitting requests to add or remove exclusions to PIEE Records Retention & Destruction for their organization's records.
- All requests to add or remove an exclusion from PIEE Records Retention & Destruction must be submitted via the request forms available on the DoD Procurement Toolbox at <https://dodprocurementtoolbox.com/site-pages/piee-records-retention-destruction> by the designated Component lead to PIEE_Rec_Retention@dla.mil. The PMO will reject all requests if not received from the designated component leads through phase 3 of records retention (September 30, 2020).
- If the exclusion is for one or more closed contracts that need to be re-opened in EDA, the Component lead must also complete the Trouble Ticket Tracker (T3) Request Form located on the DoD Procurement Toolbox at <https://dodprocurementtoolbox.com/site-pages/piee-records-retention-destruction>, list all contract number/order numbers that need to be re-opened on the T3 Request Form, and email the T3 Request Form to disa.global.servicedesk.mbx.eb-ticket-requests@mail.mil.
- Beginning January 1, 2021, the PMO will allow exclusion requests based on record type, user Department of Defense Activity Address Code (DoDAAC), and user role within PIEE in addition to component leads/Level II GAMs. The table below outlines the Authorized Individual for submitting exclusions.

Record Type	Authorized Individual
Awards	Contracting or Grant Officer* for either the Issuing or Administering Office
Micro-Purchase Card Receiving Reports	Local GAM for the Acceptor DoDAAC
Miscellaneous Payments	Local GAM for the Approver DoDAAC
Purchase Requests (Not associated with an Award)	Local GAM for the To or From Office DoDAAC
Government-to-Government Property Transfers	Local GAM for the Receiving or Shipping Office DoDAAC
Transportation Documents	Local GAM
Canceled Solicitations	Contracting or Grant Officer* or the Local GAM for the Contracting Office DoDAAC
All Document Types	Component Level II GAM

*Contracting or Grant Officers must be active and have a valid warrant

7. Upon receiving an exclusions request, the PMO will add (or delete) the requested record(s) to the exclusion table in PIEE, and provide the Component POC with confirmation that the request has been received and processed successfully.
8. The PMO will provide a list of records that were excluded from destruction to DPC on a quarterly basis.
9. The PMO will direct users to the Record Destruction Report in EDA should they have questions about what PIEE record have been destroyed.

Appendix F: Documents where Retention is based on Closeout Date

Business Process	PIEE Document Type	PIEE Module
Awards	Communication and attachments tied to contracts	CCM
Awards	Communication and attachments tied to Solicitations	CCM
Awards	Contract Closeout worksheets	CCO
Awards	Contract Deficiency Reports	CDR
Awards	Conformed PDS	EDA
Awards	Contract Closeout EDA	EDA
Awards	Contract PDS	EDA
Awards	Modification PDS	EDA
Awards	SF44	EDA
Awards	Contractor Acquired Property Pre-screening	GFP
Awards	GFP Attachment tied to contracts	GFP
Awards	GFP Attachment tied to Solicitations	GFP
Awards	Property Loss Record	GFP
Awards	Property Transfer Record	GFP
Awards	COR Appointment	JAM
Awards	Historical Invoice data	myInvoice
Awards	DD Form 254 Prime	NCCS
Awards	DD Form 254 Solicitation	NCCS
Awards	DD Form 254 Subcontract	NCCS
Awards	DD Form 254 Tier 1	NCCS
Awards	DD Form 254 Tier 2	NCCS
Awards	DD Form 254 Tier 3	NCCS
Awards	Facility Clearance Request	NCCS
Awards	National Interest Determinations Request	NCCS
Awards	Contractor DODAAC Assignment	PCM
Awards	Offer and attachments	Solicitation Portal
Awards	Solicitation and attachments	Solicitation Portal
Awards	Contract Nominations and attachments	SPM
Awards	COR Online File and attachments	SPM
Awards	Commercial Item Financing	WAWF
Awards	Construction Payment Invoice	WAWF
Awards	Corrected Receiving Report	WAWF
Awards	Cost Voucher	WAWF
Awards	Cost Voucher - Shipbuilding	WAWF
Awards	Credit Invoice	WAWF
Awards	Energy Invoice	WAWF
Awards	Energy Price Corrected Invoice	WAWF
Awards	Energy Receiving Report	WAWF
Awards	Invoice	WAWF
Awards	Invoice as 2-in-1 (Services Only)	WAWF
Awards	Invoice Fast Pay	WAWF
Awards	Navy Construction Payment Invoice	WAWF
Awards	Navy Ship Building Invoice	WAWF
Awards	Performance Based Payment	WAWF
Awards	Progress Payment	WAWF
Awards	Property Transfer Document GV	WAWF
Awards	Property Transfer Document SV	WAWF
Awards	Property Transfer Document VG	WAWF
Awards	Property Transfer Document VV	WAWF
Awards	Property Transfer Document CC	WAWF
Awards	Property Transfer Document VRC	WAWF
Awards	Property Transfer Document RD	WAWF
Awards	Property Transfer Document GR	WAWF
Awards	Receiving Report	WAWF
Awards	Receiving Report (Foreign Military Sales (FMS))	WAWF
Awards	Reparables Receiving Report (Foreign Military Sales (FMS))	WAWF
Awards	Reparables Receiving Report (RRR)	WAWF
Awards	Telecommunications Invoice (Contractual)	WAWF
Awards	Transfer Performance Evidence Receiving Report (IGT)	WAWF
Awards	Purchase Card Receiving Report	WAWF
Awards	Grant Voucher	WAWF
Awards	Non-Procurement Instruments (NPI) Voucher	WAWF

Appendix G: Documents where Retention is based on Other Dates

Business Process	PIEE Document Type	PIEE Module	Records Retention Start Date Indicator
MPC RR	Micro-Purchase Card Receiving Reports	WAWF	Date of Transaction (received date)
Miscellaneous Payments	Miscellaneous Payment Documents	WAWF	Payment Date from MyInvoice
Miscellaneous Payments	Telecommunications Invoices (Non-Contractual)	WAWF	Payment Date from MyInvoice
Purchase Requests	MIPRs	EDA	Acceptance Date
Purchase Requests	eMIPRs	eMIPR	Acceptance Date
Government-to-Government Property Transfers	Property Transfer Documents (GG)	WAWF	Date of transfer
Government-to-Government Property Transfers	Property Transfer Documents (GRD)	WAWF	Date of transfer
Transportation Documents	Personal Property GBL	EDA	Index Date
Transportation Documents	Freight GBL	EDA	Index Date
Transportation Documents	Non-Automated GBL	EDA	Index Date
Transportation Documents	Transportation requests	EDA	Index Date
Cancelled Solicitations	Canceled Solicitations	Solicitation	Posting Date

Appendix H: Acronyms

CCM - Contracting Communication Module
CCO - Contract Closeout
CDR - Contract Deficiency Report
DFARS - Defense Federal Acquisition Regulation Supplement
DoD - Department of Defense
DoDAAC - Department of Defense Activity Address Code
DoDGARs - Department of Defense Grant and Agreement Regulations
DPC - Defense Pricing and Contracting
EDA - Electronic Document Access
eMIPR - electronic Military Interdepartmental Purchase Request
FAR - Federal Acquisition Regulations
FMR - Financial Management Regulations
FPDS - Federal Procurement Data System
GFP - Government Furnished Property
GRS - General Records Schedule
IUID - Item Unique Identification
JAM - Joint Appointment Module
MIPR - Military Interdepartmental Purchase Request
NARA - National Archives and Records Administration
NCCS - NISP Contract Classification System
NISP - National Industrial Security Program
PIEE - Procurement Integrated Enterprise Environment
PMO - Program Management Office
PR - Purchase Request
SF - Standard Form
SOP - Standard Operating Procedure
SPM - Surveillance and Performance Monitoring
WAWF - Wide Area WorkFlow