Federal Supply Service

GSA: Doing Business with DoD through Federal Supply Service Contract

As the Department of Defense (DoD) transforms the way they do business, GSA must be a strategic partner in supporting DoD. On July 29, 2003, the DoD Acting Under Secretary of Defense (AT&L) issued a Memorandum entitled "Policy for Item Unique Identification (IUID) of Tangible Items - New Equipment, Major Modifications, and Reprocurements of Equipment and Spares" that made IUID mandatory for all solicitations issued on or after 1 January 2004 by, or on behalf of a DoD activity. Additional memoranda issued on September 3, 2004 and December 23, 2004 expanded the policy to legacy items, including Government Furnished Property, and outlined implementation requirements for IUID. The IUID Policy is considered to be the cornerstone of DoD’s Business Transformation.

IUID establishes the requirement for marking and valuing items delivered to DoD that will enhance logistics, contracting, and financial business transactions supporting the United States and coalition troops. DoD contracting offices must include DFARS Clause 252.211-7003, Item Identification and Valuation contract clause, in all solicitations and reference MIL-STD-130. This key policy change will affect the way you fill orders from DoD customers. It is important to work with the DoD contracting offices to support what is considered to be a strategic imperative.

DoD’s goal is to improve business processes by achieving lower life-cycle cost of item management and improve life cycle property management; improve operational readiness; provide reliable accountability of property and asset visibility throughout the life cycle; and reduce the burden on the workforce through increased productivity and efficiency. The following is a list of common questions and their answers to help foster greater understanding of the DoD IUID policy and its implications in supporting the DoD customer through your GSA contract.

Q & A

Q. What DFARS Clauses compose the IUID policy?
A. The following is a summary of the DFARS SUBPARTS and the Clause that compose the IUID policy. For the complete language in each clause please refer to the IUID webpage at www.uniqueid.org.

DFARS 211.274 -2 Policy for Unique Item Identification
It is DoD policy that DoD unique item identification, or a DoD recognized unique identification equivalent, is required for:

- Unit acquisition cost is $5000 or more
- If less than $5,000 unit acquisition cost, item is serially managed, mission essential, or controlled inventory
- requiring activity determines that permanent identification is required

Regardless of value
- Item is a DoD serially managed subassembly, component, or part embedded within a delivered item
- The parent item (as defined in 252.211-7003(a)) that contains the embedded subassembly, component, or part

211.274-3 Policy for Valuation.
It is DoD policy that contractors shall be required to identify the Government's unit acquisition cost (as defined in 252.211-7003(a)) for all items delivered, even if none of the criteria for placing a unique item identification mark applies.

(b) The Government's unit acquisition cost is—

- For fixed-price type line, subline, or exhibit line items, the unit price identified in the contract at the time of delivery;
- For cost-type or undefinitized line, subline, or exhibit line items, the contractor's estimated fully burdened unit cost to the Government at the time of delivery; and
- For items delivered under a time-and-materials contract, the contractor's estimated fully burdened unit cost to the Government at the time of delivery.

(c) The Government's unit acquisition cost of subassemblies, components, and parts embedded in delivered items need not be separately identified.

DFARS Clause 252.211-7003 Item Identification and Valuation is the contract clause.

Q. What is Item Unique Identification (IUID)?
A. Item Unique Identification is a set of data for assets that is globally unique and unambiguous, ensures data integrity and data quality throughout life, and supports multi-faceted business applications and users. Item Unique Identification depends upon a combination of data elements, which is determined by how the enterprise serializes items. There are two acceptable methods of serialization – (1) Serialization within the enterprise identifier, and (2) Serialization within the part number.

Q. What is an Enterprise Identifier?
A. An enterprise identifier is a code uniquely assigned to an enterprise by a registered issuing agency. An issuing agency is an organization responsible for assigning a non-repeatable identifier to an enterprise [i.e., Dun & Bradstreet's Data Universal Numbering System (DUNS) Number, Uniform Code Council (UCC)/EAN International (EAN) Company Prefix, Allied Committee 135 Commercial and Government Entity (CAGE) Number].

Q. What technology is used to mark an Item?
A. The technology used to mark an item is 2D Data Matrix ECC 200 Symbol. 2D Data Matrix is a two-dimensional barcode that can store from 1 to about 2,000 characters, and must be applied to items via dot peen, ink jet, label, laser etching, acid etching, or other methods. 2D-Data Matrix is the type of symbol or mark that will contain the IUID information about the part. MIL-STD-130 discusses the use and requirements for 2D-Data matrix.

Q. Does the DFARS Clause apply to DoD orders through GSA contract vehicles?
A. Yes. The DoD IUID policy is mandatory for all DoD issued solicitations, contracts, and delivery orders which includes orders through GSA contracting vehicles.

Q. Are there any exceptions?
A. Exceptions to the DoD IUID policy is contained in DFARS Clause 211.274-1(b). DoD understands there are many industry practices that will need to be fleshed out on a case by case basis.

Q. Who is responsible for determining what items require a IUID?
A. The DoD requiring activity is responsible for inserting DFARS clause 252.211-7003, and defining and listing the items requiring identification and valuation. DFARS clause 252.211-7003(c)(1) The Contractor shall provide DoD unique item identification, or a DoD recognized equivalent, for-
(i) All items for which the Government’s unit acquisition cost is $5,000 or more; and
(ii) The following items for which the Government’s unit acquisition cost is less that $5,000; Contract Line, Subline, or Exhibit Line Item Number Item Description

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**UID Solutions**
There are several low cost marking services available that could provide IUID solutions. These companies may provide automated marking capability compliant with MIL-Std-130, data submission services as part of the material shipping, inspection and receiving process, and the warehousing of data as well as consulting and training services. GSA added IUID services to the Federal Supply Schedules Program. Contracts are currently being awarded under Federal Supply Schedule 81 I B SHIPPING, PACKAGING AND PACKING SUPPLIES, UID and RFID services. For more information, please to www.gsa.gov and search UID.

**Training Opportunities**
The DoD UID Program Office is engaged in a large communications effort working with several organizations to provide IUID training. For more information on IUID training please go to www.uniqueid.org.

**Resources and Contact Information**
For more information about on how to support the DoD IUID program using your GSA contract please contact go to www.gsa.gov and search UID or visit the DoD IUID Program Office’s web site at www.uniqueid.org.