Questions and Answers: Differences Between the FAR vs. Agency Requirements, DoD Instructions Directives

Question: What is the difference on GFP and GFM?

Government Furnished Material (GFM) is a subset of Government Furnished Property (GFP). GFP covers both equipment and material.

Question: Is the DD 1149 the primary document used to transfer property between the government and contractors?

The DD 1149 is one of many forms utilized in the process of documenting a transfer of property. The GFP transfer process has traditionally been paper-based where items frequently arrive at the Contractor facility with little documentation and no notification that they are being shipped. This approach causes significant research effort and the potential for errors. The Department is moving toward electronic transactions, and to accomplish a GFP custody transfer, DoD uses Wide Area Workflow (WAWF) to accomplish the documentation part of transferring property.

Question: Do agencies have to account for CAP in their property records?

Contractor Acquired Property (CAP) should not be recorded in the Government APSR unless it is formally delivered and accepted by the Government. Once CAP is delivered and accepted by the Government, it is no longer considered CAP and should be considered Government property or GFP, depending on the intended future use of the property.

Question: With regard to Contractor Acquired Property (CAP), can you define "delivery"?

In the case of CAP, “delivery” means that the CAP items must be delivered to the Government against a CLIN and the Government performs receipt and acceptance procedures for the CAP items. At that time, the CAP items become GFP and accountable property records are created to maintain accountability over these items. Refer to DFARS PGI 245.402.70 and 245.402-71 for specific guidance regarding Contractor Acquired Property and its delivery to the Government.

Question: Does GSA prescribe how disposal is conducted or do we follow FAR 45.6 and DFARS 245.6 solely?

It’s important to follow what is in the contract. Start with the applicable FAR and DFARS clauses, but also note that different program offices must give instructions of how and when they want the disposal done.

Question: Is WAWF intended to be an automated system for transfers through R&A module?

Yes, WAWF has functionality that supports property transfer transactions. It is recommended that DoD Components begin leveraging the WAWF property transfer functionality when providing government furnished equipment and/or government furnished material to contractors.
Question: Without an Appointed PA doesn't the KO have the requirement to determine disposition of remaining property from a contract or task order within a contract?

Yes, the KO determines the disposition of remaining property from a contract/task order within a contract.

Question: Should non capitalized accountable property (e.g. minor, pilferable), be accounted for with a dollar value?

If a property record is created to establish accountability for non-capitalized item, item cost is a required field. When setting these items up in the APSR, all attempts should be made to assign a reasonable cost to these items.

Question: Is there a requirement to also account for GFP in the Accountable Property System of Record?

Yes, there is a requirement to create accountable property records for GFP in the APSR. GFP is government property and therefore must be accounted for.

Question: Who is responsible for putting the GFE into the IUID Registry?

It depends on the terms of the contract. If the appropriate IUID Registry clauses are included in the contract, then the responsibility typically falls to the contractor. Otherwise, it is the government’s responsibility to report the GFP to the IUID Registry. However, utilizing WAWF to accomplish the property transfer takes care of many of the IUID Registry requirements. The importance of using this functionality cannot be understated.

Question: Who is responsible for maintaining the evidential matter for GFE? Contracting? Property Manager?

This question has several parts. First, when a contract involves the furnishing of government property, the Scheduled Government Furnished Property attachment must be completed. The “fillable” attachment becomes part of the contract and must be maintained with the contract documentation. Second, in order for the government to maintain accountability over the government furnished equipment, accountable property records must be created in the APSR. The documentation which supports the property record must be maintained by the Accountable Property Officer (APO). For GFM, the “ship to” and “receive” transfer documentation must be maintained by property manager. To summarize, the contract contains the “permission” piece and the APSR contains the specific data about the GFP.

Question: For the GFP Data Element, Unit Acquisition Cost, when you have a quantity of 3, is this supposed to be the total cost or individual cost of the item?

For GFP records in the APSR where the item is serially managed, then individual property records should be established and the unit acquisition should reflect a quantity of 1 and its individual cost.