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GSA SMARTPAY SMART BULLETIN

**U.S. GENERAL SERVICES ADMINISTRATION
FEDERAL ACQUISITION SERVICE
SMART BULLETIN NO. 026**

GSA SmartPay–FPDS Reporting for Orders under Indefinite Delivery Vehicles At or Below the Micro-Purchase Threshold

EFFECTIVE DATE: From Issuance until superseded.

BUSINESS LINE(S) AFFECTED:
Purchase and Integrated

INTRODUCTION:

The purpose of this GSA SmartPay® Smart Bulletin is to inform customer agencies of the Federal Procurement Data System (FPDS) data reporting options when using the purchase card to place orders under Indefinite Delivery Vehicles (IDVs) that fall at or below the micro-purchase threshold.

SUMMARY:

The Federal Acquisition Regulation (FAR) Subpart 4.606(a)(1)(iii) states that, as a minimum, agencies must report all contract actions over the micro-purchase threshold awarded under an IDV, to include all calls and orders. Examples of IDVs include Task and Delivery Order Contracts (Government-wide Acquisition Contracts (GWACs) and Multi-agency contracts), GSA Federal Supply Schedules, Blanket Purchase Agreements (BPAs), and Basic Ordering Agreements (BOAs). Given that the GSA Office of Charge Card Management (OCCM) also reports purchase card data to FPDS, questions have been received as to whether or not agencies / organizations should report orders under IDVs when the order falls at or below the micro-purchase threshold and the order was placed using the purchase card. There have been concerns that, should an agency submit a direct report to FPDS for such an order, it could result in duplicative FPDS data reporting. The question has also been asked if coding Data Element 6N, Purchase Card as Payment Method, with “yes” would alleviate concerns of duplicate reports. This bulletin addresses these concerns.

OCCM provides purchase card data to FPDS as part of its responsibilities under the Government card program. The data OCCM reports to FPDS is housed outside of the regular database and is not co-mingled with data submitted by agencies / organizations; removing any concerns regarding duplicative reporting. OCCM reports only agency-level data, such as the total numbers of transactions and total dollars. OCCM data does not associate orders placed using the purchase card to specific IDVs. If an agency / organization require that FPDS contain that data for the purposes of tracking and monitoring IDV-specific utilization, agencies / organizations must report such orders to FPDS directly.

Agencies / Organizations have the option to consolidate FPDS reporting for orders at or below the micro-purchase threshold placed with the purchase card that would otherwise be administratively burdensome to report separately. The FPDS Express Reports can be used for this purpose, as outlined in FAR Subpart 4.606(a)(3). For example, an agency / organization may have a single IDV where 50% of the orders for the month were placed with the purchase card and fall at or below the micro-purchase threshold. In this situation, the agency / organization would report all orders over the micro-purchase threshold via separate Contract Action Reports (CARs) as required by FAR 4.606, but could also choose to combine all orders that fall at or below the micro-purchase threshold under a single IDV-specific FPDS Express Report for the purposes of tracking total IDV-specific utilization. When FPDS Express Reports are used they should be submitted at least monthly.

When either FPDS CARs or Express Reports are utilized, Data Element 6N (Purchase Card as Payment Method) should be coded "yes" when the purchase card was or will be used to pay the contractor for the order(s) being reported. Data Element 6N provides an indication that the action was backed by a contract vehicle / document where paperless methods of invoicing and payment were used and is only used for the purposes of sustainability reporting.

RESOURCES:

[FAR Subpart 4.606\(a\)\(1\) and \(3\)](#)

[FPDS Data Element Dictionary, Version 1.2 \(September 2015\)](#)

ACTION: A/OPCs, Cardholders, and Agency / Organization FPDS Systems Administrators should determine a consistent process by which to report orders under IDVs that fall at or below the micro-purchase threshold such that an agency / organization utilization of IDVs is fully reflected in FPDS, as the agency / organization so desires.

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If you have any questions or comments regarding this Smart Bulletin, please contact OCCM at 703-605-2808 or via email at: gsa_smartpay@gsa.gov