



GSA Public Buildings Service

PBS Procurement Instructional Bulletin 22-01
PBS Leasing Alert LA-22-05
Amendment 01

MEMORANDUM FOR: PUBLIC BUILDINGS SERVICE
REGIONAL COMMISSIONERS
ACQUISITION DIRECTORS

FROM: TRACY MARCINOWSKI
ASSISTANT COMMISSIONER
OFFICE OF ACQUISITION MANAGEMENT (PQ)

DocuSigned by:
Tracy Marcinowski
B3621A40537141C...

CROFTON WHITFIELD
ASSISTANT COMMISSIONER
OFFICE OF LEASING (PR)

DocuSigned by:
Crofton Whitfield
4C7C964DC58B41F...

SUBJECT: Elimination of FPDS-NG Reporting Requirements for
Contract Actions Impacting Leases

1. Purpose

The purpose of this joint Procurement Instructional Bulletin (PIB) and Leasing Alert (LA) is to update previously issued policy eliminating the Federal Procurement Data System - Next Generation (FPDS-NG) reporting requirements for all procurement actions impacting a leasehold interest in real property. This policy is meant to be a bridge that will allow FPDS reports to be bypassed in FPDS for transactions regarding contract awards issued directly to the lessor and it is not intended to be used for any other lease related transaction.

The purpose of this Amendment is to extend the expiration date of this policy from 9-30-2023 to 9-30-2025.

2. Background

The Office of Federal Procurement Policy Act, as amended, requires that the Administrator for Federal Procurement Policy establish a computer-based Federal Procurement Data System for collecting, developing and disseminating procurement data to Congress, Executive Branch and private sector. The Federal Procurement Data System Program Management Office (FPDS-NG PMO) within the Integrated Award Environment (IAE) oversees the operation of the FPDS-NG.

FPDS-NG is designed to be a central repository of statistical information on federal contracting that seeks to provide detailed information on contract actions over the micro-purchase threshold. The system can identify who bought what, from whom, for how much, when and where. Federal Acquisition Regulation (FAR) Subpart 4.6 prescribes uniform reporting requirements for FPDS-NG.

While lease or lease amendment information may be reported to FPDS-NG¹, FAR Section 4.606(a) does not require reporting of lease or lease amendment information into FPDS-NG.

The General Services Administration (GSA) originally reported lease data into FPDS-NG; however, FPDS-NG is designed to hold information about short term FAR-based contracts. Leasehold contracts are governed by the General Services Acquisition Manual (GSAM) Part 570, not the FAR, and have longer terms of up to 20 years. The “forcing” of the longer term lease data into FPDS-NG caused data accuracy issues for the system.

On August 20, 2012, the Office of Acquisition Management and Office of Leasing issued the joint memorandum entitled “Elimination of FPDS-NG Reporting Requirement for Contract Actions Impacting Leases.” This memorandum, which had a stated effective period of five years, was never modified, canceled or reissued. However, since the data accuracy and system incompatibility issues noted above have not changed, both offices agreed to reissue and update the expired policy.

GSA currently publicizes lease contract awards exceeding \$25,000 that are likely to result in the award of subcontracts on the www.sam.gov website in Contract Opportunities. By synopsising lease contract awards on Contract Opportunities, GSA enables the public to learn about contract awards and potential subcontractors to learn about projects and provide opportunities for them to make bids. In addition, GSA posts lease inventory information on its public website (www.gsa.gov) every month to enable the public, subcontractors, and other interested parties to obtain information on GSA leases.

3. Effective Date

This joint PIB/LA is effective immediately.

4. Cancellation Date

This PIB/LA will remain in effect until 09/30/2025.

¹ It is noted that reporting of these actions is only allowed under certain stipulations in accordance with FAR 4.606(b)

5. Affected or Canceled Policies

PIB 22-01, issued July 27, 2022, is replaced by this amended PIB.

6. Applicability

This memorandum applies to all contract actions that are awarded directly to a lessor, regardless of whether the contract action was executed by a warranted contracting officer or a warranted lease contracting officer.

7. References

FAR 4.6 Contract Reporting

FAR 4.606 Reporting Data

GSAM 504.1670 Unique identifier for procurements supporting a leasehold interest

GSAM 570 Acquiring Leasehold Interests in Real Property

8. Exemptions

This joint PIB/LA does not apply to contracts for broker services, architectural and engineering (A&E) design and other related activities, project management, construction, space alterations, security-related tenant buildout, building-specific security countermeasures, and personal (moveable) property awarded to vendors that are not lessors.

9. Instructions and Procedures

All contracting officers creating awards in EASi must follow the Instructions and Procedures Attachment.

10. Attachments

[Instructions and Procedures Attachment](#)

11. Points of Contact

Any questions regarding the content of this joint PIB/LA may be addressed to the PBS Office of Acquisition Management at pbsoampolicy@gsa.gov or Julie Hepp, Senior Realty Specialist, Office of Leasing, by email at juliek.hepp@gsa.gov.