Get Ready for RWA Fee Reform

As you probably know, GSA's fee structure is changing. Any RWAs with an <u>original/initial</u> Acceptance Date of August 1, 2020 or later will follow the new fee structure while any RWAs with an <u>original/initial</u> Acceptance Date prior to August 1, 2020 will follow the existing fee structure. Some common Q&As and links to more resources can be found below.

What is the new fee structure?

The new fee structure combines the current sliding scale fee and 4% fee associated with nonrecurring RWAs into a single fee determined by a percentage of overall project costs.

Is the new fee structure the same for all RWAs?

No. It depends if it is a recurring or nonrecurring RWA...

- Recurring RWAs (e.g. overtime utility services that are not separately metered or billed): charged a flat \$500 fee.
- Nonrecurring RWAs (e.g. services that are separately metered or billed, or projects): charged based on the stepped fee structure.

Where can I find the stepped fee ranges and rates for nonrecurring RWAs?

Go to www.gsa.gov/rwa and click on the "Policy & Guidance" page, where you'll find a Fact Sheet titled "What is the New Fee Structure?", which includes a chart showing ranges and rates of the new stepped fee structure.

How do I know if the existing or new fee structure will be applied to my RWA?

It depends on the RWA Acceptance Date. If the Acceptance Date is 08/01/2020 or later, the RWA will follow the new fee structure. If the Acceptance Date is 07/31/2020 or earlier, the RWA will follow the existing fee structure.

Does the Acceptance Date mean the same thing for all RWAs?

No. The definition is different for severable vs. nonseverable RWAs.

- Severable RWAs (e.g. services like overtime utilities, cleaning, preventative maintenance where the benefit is realized as the service is being rendered): the Acceptance Date is equal to the start date of the period of performance.
- Nonseverable RWAs (e.g. projects like construction, renovations, alterations where the benefit is realized only
 once the project is finished): the Acceptance Date is equal to the date the GSA Approving Official digitally signs
 (accepts) the RWA.

Is the fee structure applied on my Summary Cost Estimate (SCE) the same fee structure that will be applied to the RWA?

It depends when the RWA is accepted. Ultimately, the RWA Acceptance Date drives what fee structure is applied to the RWA, regardless of what fee structure was applied on the SCE. If the estimated start date on the SCE is a date before August 1 but the RWA ends up being accepted on or after August 1, then the estimate will no longer accurately reflect future charges against the RWA. The same applies if the estimated start date on the SCE is after August 1 but the RWA ends up being accepted before August 1. In these scenarios, the SCE will need to be revised after the RWA is accepted, and an RWA amendment should be submitted in eRETA to reflect the appropriate costs. GSA will be monitoring SCEs and RWAs with mismatched Acceptance Dates and assist the GSA region and customer to reconcile the differences.

Does the New Fee Impact Currently Accepted RWAs?

Any RWA that is currently accepted, or is accepted prior to August 1, 2020, will utilize the existing fee structure (4% fee plus sliding scale fee) until it is completed and closed out. The original RWA Acceptance Date will determine the applicable fee structure. RWAs accepted before, but amended after the new fee implementation will continue to utilize the existing 4% fee and sliding scale fee structure.

Can we avoid RWA fees?

In a nutshell, no, but with limited exceptions. Projects and services above and beyond what is included in an agency's rental agreement must be provided via an RWA, which will include RWA fees. The exception is for agencies utilizing the Micro-Purchase Delegation of Authority. This allows customers to directly procure micro-purchase projects and services (typically \$2000 or less) without an RWA in facilities under the jurisdiction, custody, and control of GSA. To utilize this option, a) the Delegation must be re-delegated from your Head of Agency to the local region and field office level and b) the GSA building/facility manager must approve of each request on a case by case basis. For more information, visit GSA's Facilities Management page.

Where can I find more resources regarding RWA Fee Reform?

All prior communications and resources regarding RWA Fee Reform can be found at www.gsa.gov/rwa on the "Policy & Guidance" page.

BONUS KNOWLEDGE: Training, training and more training!

Visit www.gsa.gov/ereta where you'll find a wealth of training materials including user guides, Quick Tips (like this one), and more. We are offering one final RWA Fee Reform training session, and continuing to offer our monthly eRETA Digest training session featuring highlights from past eRETA Overview and Advanced sessions. These trainings are held through GSA's Client Enrichment Series and you can register by visiting www.gsa.gov/ces or by clicking the links below!

- RWA Fee Reform
 - o July 16: 2-3:30pm (eastern)
- eRETA Digest Live Virtual Training Session
 - o <u>July 14: 1-2:30pm (eastern)</u>
 - August 11: 1-2:30pm (eastern)