

DEPARTMENT OF VETERANS AFFAIRS DEPUTY ASSISTANT SECRETARY FOR ACQUISITION AND LOGISTICS WASHINGTON DC 20420

IL 001AL-09-08 May 4, 2009

OFFICE OF ACQUISITION AND LOGISTICS INFORMATION LETTER

TO: Under Secretaries for Health, Benefits, and Memorial Affairs;
Assistant Secretary for Management; Director, Office of Construction and
Facilities Management; Veterans Integrated Service Network Directors;
Directors, VA Medical Center Activities, Outpatient Clinics, Medical and
Regional Office Centers, and Regional Offices; Directors, Denver Acquisition
and Logistics Center, VA Austin Information Technology Center, Records
Management Center, VBA Benefits Delivery Centers, and the VA Health
Administration Center; Executive Director and Chief Operating Officer, VA
National Acquisition Center; Chief Information Officer; VA Health Revenue
Center; and VA Health Eligibility Center

ATTN: Heads of Contracting Activities and Department of Veteran Affairs (VA)
Contracting Officers (CO)

SUBJ: Reporting Competitive Actions in the Federal Procurement Data System (FPDS)

I. Purpose

The purpose of this Information Letter (IL) is to announce changes to the FPDS Contract Action Report data fields related to competition and commercial items. This IL applies to all VA contracting and procurement activities and is effective immediately.

II. Background

- A. One of the primary responsibilities of COs and competition advocates is to promote full and open competition. Another responsibility is promoting the acquisition of commercial items. The FPDS is an important tool in analyzing the effectiveness of VA procurements in both these areas. For this reason, it is essential to report accurate information in both categories when entering data into FPDS.
- B. According to FPDS, VA obligated approximately \$547 million in commercial services and supplies in fiscal year (FY) 2008. This amount is misleadingly low, given the millions of dollars in commercial items procured for medical and information technology supplies and services. One of the reasons the number is low is because the data field (i.e., Commercial Item Acquisitions) in FPDS is optional instead of mandatory.

C. There is a similar problem with reporting competition information on task and delivery orders. According to FPDS data retrieved on December 19, 2008, of the \$14.6 billion that VA reported in FPDS for FY 2008, only 49 percent of the dollars (i.e., \$6.67 billion) included competition information. The other \$7.93 billion lacked A. competition information primarily because nearly 99 percent of the actions were procured on task and delivery orders, for which FPDS does not require competition information from civilian agencies.

III. New FPDS Reporting Requirements

Effective immediately, each CO is required to enter the appropriate data into the following fields in FPDS for all awards over \$25,000. These fields are also required for all awards entered in VA's Electronic Contract Management System or the FPDS online interface, regardless of dollar value, as specified below:

- A. The field entitled "Extent Competed" must be coded in all awards, including task and delivery orders and orders against blanket purchase agreements (BPA).
 - 1. Task and delivery orders under a competitive single-award indefinite-delivery vehicle (IDV) must be coded as "Competitive Delivery Order."
 - 2. Task and delivery orders under a multiple-award IDV must be coded as "Competitive Delivery Order" or "Non-Competitive Delivery Order."
 - 3. BPA calls must be coded with the same "extent competed" code of the BPA.
- B. The field entitled "Reason Not Competed" must be coded in all awards except task and delivery orders.
- C. The field entitled "Statutory Exception to Fair Opportunity" must be coded in all task and delivery orders not competed.
- D. The field entitled "Commercial Item Acquisition Procedures" must be coded in all awards where the field is available.
- E. The field entitled "Information Technology Commercial Item Category" must be coded in all awards where the field is available.

IV. Point of Contact

Questions regarding this IL should be directed to Risk Management and Compliance at (770) 297-7462.

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Maurice C. Stewart Associate Deputy Assistant Secretary for Acquisition and Logistics Programs and Policy