

GSA ORDER

Subject: General Services Administration Acquisition Manual; GSAM Case 2020-G522,
Clarify Written Acquisition Plan Requirements at 507.1

1. Purpose. This order transmits a revision to the General Services Administration Acquisition Manual (GSAM).
2. Background. As part of the GSAM Rewrite Initiative, conducted around 2009, GSAM part 507 was revised to maintain consistency with the FAR. FAR 7.103(e) allows agencies to establish their own supplemental policies for acquisition planning, including thresholds for written acquisition plans. The rewrite of GSAM part 507 did not include a specific statement to make it clear that written acquisition plans are only required for acquisitions exceeding the Simplified Acquisition Threshold (SAT). Subsequently, AL MV-11-04 was issued on 03/12/2010 to make it clear that while acquisition planning is required for all acquisitions, written acquisition plans are only required for acquisitions above the SAT. Further, GSAM 507.105(c)(1) currently references the SAT limit for commercial items at \$6 million while the SAT limit for commercial items is \$7 million, per FAR 13.500. Finally, cross-references throughout the GSAM should mirror requirements in FAR 1.105-2. This GSAM case makes changes to conform with the above updates and makes additional editorial changes to clarify acquisition planning.
3. Effective date. Date of signature.
4. Explanation of changes. This amendment includes only non-regulatory changes. For full text changes of the amendment see Attachment A, GSAM Text Line-In/Line-Out.

This amendment revises the language of the following GSAM subparts, changes summarized below:

A. 507.103 Agency-head responsibilities.

Adds "part" as necessary to conform with conventions at FAR 1.105-2(c)(3). Redesignates existing language at 507.103 as paragraph (a). Inserts amended language previously at 507.105(c), Approval Thresholds, as paragraph (b).

507.103(b): Moved from 507.105(c), with the following amendments. Removes extra space in cross-reference to part 570. Adds language within the approving threshold column to clarify threshold ranges.

Changes \$6 million stated dollar threshold with the text, “the threshold for Simplified Procedures for Certain Commercial Items.” This change replaces a non-statutory, stated dollar threshold with a word-based threshold to ease maintenance of regulations given the likelihood of future changes.

B. 507.104 General procedures.

507.104(a): Editorial corrections, including spacing and capitalization to conform with conventions at FAR 1.105-2(c)(3), as necessary.

507.104(c): Adds “exceeding the SAT” to clarify written acquisition plans are only required for acquisitions above the SAT. Rearranges and adds text for clarification.

507.104(d): Moves “for all acquisitions exceeding the SAT” to the beginning of the paragraph for clarity. Adds text to clarify all acquisitions exceeding the SAT must use the APM.

C. 507.105 Contents of acquisition plans.

507.105: Renames section as “Contents of written acquisition plans.”

507.105(a): Clarifies text to conform with section title. Removes “GSAM” in cross-reference to 507.105(c).

507.105(b): Paragraph (b), Oral Plans, is renamed as “507.105-70 Contents of oral acquisition plans.” Clarifies text to conform with section title.

D. 507.107 Additional requirements for acquisitions involving consolidation, bundling or substantial bundling.

Adds “FAR” and “subpart” as necessary to conform with conventions at FAR 1.105-2(c)(3) and makes consistent editorial corrections.

E. 507.503 Policy.

Adds “subpart” and “FAR subpart” as necessary to conform with conventions at FAR 1.105-2(c)(3) and makes consistent editorial corrections.

5. Cancellations. This order cancels GSA Acquisition Letter MV-11-04.

6. Point of contact. For clarification of content, contact Ms. Megan Huppee, GSA Acquisition Policy Division, at gsarpolicy@gsa.gov.

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Senior Procurement Executive
Office of Acquisition Policy
Office of Government-wide Policy

TAB A – GSAM Text, Line-In/Line-Out

GSAM Baseline: Change 114, dated 10/19/2020

- Additions to baseline made by rule are indicated by [bold text in brackets]
- Deletions to baseline made by rule are indicated by ~~strikethroughs~~
- Five asterisks (*****) indicate that there are no revisions between the preceding and following sections
- Three asterisks (***) indicate that there are no revisions between the material shown within a subsection

Part 507 – Acquisition Planning

Subpart 507.1 – Acquisition Plans

507.103 Agency-head responsibilities.

[(a)]The HCA must ensure that the planning team adheres to the requirements of FAR [part 7, Acquisition Planning] ~~and this part~~.

[(b) *Approval thresholds.* (1) The following are the dollar value thresholds and the level of the approving official for approving acquisition plans or waiving written acquisition plans. For purposes of leasing, the Simplified Leasing Acquisition Threshold (SLAT) is defined in part 570. The HCA may authorize higher level approving officials for the thresholds set out below.

Threshold	Approving Official
Up to, and including the SAT (SLAT for leases)	Contracting Officer
Over SAT (SLAT for leases) to, and including, the threshold for Simplified Procedures for Certain Commercial Items	One Level above the Contracting Officer

Over the threshold for Simplified Procedures for Certain Commercial Items to, and including, \$20 million	Contracting Director
Over \$20 million	HCA

(i) Thresholds include all options.

(ii) The thresholds provided in paragraph (1) are defined as follows—

(A) The SAT is defined at FAR 2.101.

(B) The SLAT for leases is defined at 570.102.

(C) The threshold for Simplified Procedures for Certain Commercial Items is detailed at FAR 13.500.

(2) If the acquisition meets one of the following criteria and is greater than the SAT, the planner must obtain HCA approval of the acquisition plan:

(i) Complex, critical to agency strategic objectives and mission, highly visible or politically sensitive.

(ii) An acquisition with which GSA has little or no experience that may result in a need for greater oversight or risk management.

(iii) Actions using significantly changed methods (e.g., methods of procurement such as lease versus purchase, or methods of performance such as contractor versus Government personnel).

(iv) New construction or repair, lease prospectus and alteration prospectus budget line items.

(v) Any acquisition that involves—

(A) Consolidation above \$2 million (FAR 7.107-2); or

(B) Bundling at any dollar value (FAR 7.107-3).

(3) Acquisitions requiring additional transactional data reporting elements to those listed in subparagraph (b)(2) of clauses 552.216-75 and 552.238-80 Alternate I—

(i) Must be coordinated with the applicable category manager, and obtain approval by the HCA and SPE; and

(ii) Must provide the information at 501.304(b)(4) in the rationale for adding transactional data reporting elements.

(iii) The approval requirements in this subparagraph do not apply to additional data elements added to a task/delivery order or blanket purchase agreement. However, coordination with the applicable category manager is required.]

507.104 General procedures.

(a) The planner shall:

(1) Comply with the requirements of FAR [s]Subpart 7.1[and this subpart], and coordinate with other members of the planning team as appropriate.

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(6) Coordinate with the GSA Chief Information Officer (CIO) if the action involves GSA information technology and ensure acquisition plans are approved by the GSA CIO. Guidance for identifying the applicable GSA CIO point of contact can be found on GSA's Acquisition Portal at <https://insite.gsa.gov/acquisitionportal>. For interagency acquisitions involving information technology, see subpart- 517.5.

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(8) Coordinate with the Office of General Counsel on an as needed basis, but definitely for[**acquisition**] plans over \$20 million.

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(10) Follow sustainability policies and procedures specified in part- 523 throughout the procurement.

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(c) *Applicability.* ~~With the following exceptions, a~~[A]ll acquisitions[**exceeding the SAT**], including orders and BPAs, require written acquisition plans.

(1) When awarding a single IDIQ contract[, **an acquisition plan will be developed for the base contract. The resulting orders should be covered by and reference the same acquisition plan.**

(2) **When awarding]**or a BPA for a specific requirement and agency, an acquisition plan will be developed for the base contract. The resulting orders should be covered by and reference the same acquisition plan.

([3]2) [For o]Oral[**acquisition**] plans[, **see 507.105-70**].

(d) ~~[For all acquisitions exceeding the SAT, t]~~The planner ~~[must]~~is encouraged to use the Acquisition Planning Module (APM) at <https://gsa.appiancloud.com/suite/tempo/>, or any successor system, ~~for all acquisitions exceeding the SAT~~. Not later than 7 calendar days after the acquisition plan is approved, if not completed in ~~[the]~~APM, an electronic copy shall be sent to acquisitionplans@gsa.gov.

507.105 Contents of [written]acquisition plans.

(a) ~~Written.~~ (1) The APM contains the ~~format~~**[content]** prescribed in FAR 7.105 and shall be used in the preparation of **[written]**acquisition plans. Where a particular element described in FAR 7.105 does not apply, the acquisition plan should read “not applicable.” The dollar value, complexity (e.g., commercial versus non-commercial item) and method of acquisition (e.g., full and open competition versus task/delivery order) of the supplies and services to be acquired will affect the scope and breadth of the acquisition plan.

[(b)]2) FAR 7.106 (*major systems*) and FAR 7.107 (*consolidation, bundling, or substantial bundling*) shall be addressed in the**[acquisition]** plans, if applicable.

[(c)]3) For leasehold interests in real property, a modified version of the contents of acquisition plans for leases is provided in the APM.

[(d)]4) The requirement for a written**[acquisition]** plan may be waived by the appropriate level of an approving official listed in ~~GSAM~~507.105(c). When the requirement for a written**[acquisition]** plan is waived, an oral**[acquisition]** plan is still required. The planner must obtain approval for the oral**[acquisition]** plan from the approving official.

[(e)]5) Software. If procuring software, specify the result of any software requirement alternatives analysis that has been completed in accordance with 511.002(d).

[507.105-70 Contents of oral acquisition plans.]

~~(b) Oral[acquisition] plans.~~ Oral**[acquisition]** plans are only authorized by approval of the HCA and may be used in unusual and compelling situations. The planner shall document a summary of the oral**[acquisition]** plan, and shall also include: the name and signature of the approving official; the date the oral**[acquisition]** plan was approved; and the reason for waiving a written**[acquisition]** plan. The summary shall be included in the official contract file. In addition, the summary should be a part of, or attached to, any justification for other than full and open competition as required by FAR 6.302, or in the basis for using an exception to the fair opportunity process required by FAR 16.505(b)(2). The summary may be prepared after award if preparation before award would unreasonably delay the award, such as in the case of circumstances warranting the use of a letter contract.

~~(c) Approval thresholds.~~ (1) The following are the dollar value thresholds and the level of the approving official for approving acquisition plans or waiving written plans. For purposes of leasing, the Simplified Leasing Acquisition Threshold (SLAT) is defined in part 570. The HCA may authorize higher level approving officials for the thresholds set out below.

Threshold	Approving Official

Below the SAT (SLAT for leases)	Contracting Officer
SAT (SLAT for leases) to, and including, \$6 million	One Level above the Contracting Officer
Over \$6 million to, and including, \$20 million	Contracting Director
Over \$20 million	HCA

Note: Thresholds shall include all options.

~~(2) If the acquisition meets one of the following criteria and is greater than the SAT, the planner must obtain HCA approval of the plan:~~

~~(i) Complex, critical to agency strategic objectives and mission, highly visible or politically sensitive.~~

~~(ii) An acquisition with which GSA has little or no experience that may result in a need for greater oversight or risk management.~~

~~(iii) Actions using significantly changed methods (e.g., methods of procurement such as lease versus purchase, or methods of performance such as contractor versus Government personnel).~~

~~(iv) New construction or repair, lease prospectus and alteration prospectus budget line items.~~

~~(v) Any acquisition that involves—~~

~~(A) Consolidation above \$2 million (FAR 7.107-2); or~~

~~(B) Bundling at any dollar value (FAR 7.107-3)~~

~~(3) Acquisitions requiring additional transactional data reporting elements to those listed in subparagraph (b)(2) of clauses 552.216-75 and 552.238-80 Alternate I—~~

~~(i) Must be coordinated with the applicable category manager, and obtain approval by the HCA and SPE; and~~

~~(ii) Must provide the information at 501.304(b)(4) in the rationale for adding transactional data reporting elements.~~

~~(iii) The approval requirements in this subparagraph do not apply to additional data elements added to a task/delivery order or blanket purchase agreement. However, coordination with the applicable category manager is required.~~

507.107 Additional requirements for acquisitions involving consolidation, bundling or substantial bundling.

507.107-1 General.

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(a) *Applicability* [.] (1) The contracting officer must determine if the requirement is considered consolidation, bundling or substantial bundling per the definitions in FAR 2.101(b) and [FAR] 7.107-4.

(2) [**Construction Indefinite-Delivery, Indefinite-Quantity (IDIQ) Contracts**] ~~Construction Indefinite-Delivery, Indefinite-Quantity (IDIQ) Contracts.~~

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(ii) [**The**] Each acquisition plan and GSA Form 2689, as applicable, must address if a consolidation determination was or will be made at an IDIQ or TO level.

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507.107-5 Notifications.

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(b) [**Notification to SBA of follow-on consolidated or bundled requirements**] ~~Notification to SBA of follow-on consolidated or bundled requirements.~~

(1) The contracting officer shall coordinate with the designated SBTA (see [**subpart**] 519.4) to provide follow-on notification to the SBA PCR in accordance with FAR 7.107-5(c). The designated SBTA will provide notification to the AA OSD BU.

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Subpart 507.5 - Inherently Governmental Functions

507.503 Policy.

(a) Concurrent with the transmittal of each statement of work or any modification to a statement of work for a service contract, the requirements office must provide the contracting officer a written determination that none of the functions to be performed are inherently governmental as defined in FAR **[subpart]7.5**. The determination must include a statement that the requirement is not for functions similar to those listed under FAR 7.503(c).

(b) The requirements office must also review the examples of functions listed under ~~paragraph (d) of FAR 7.503~~**[(d)]**. While these functions are not inherently governmental, they may restrict the discretionary authority, decision-making responsibility, or accountability of Government officials using the contractor services or work products. If the services to be acquired may cause such restrictions, the acquisition plan must discuss the associated vulnerabilities, and address management controls to mitigate them.

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(2) The requirements office is directed to use FAR 37.104 and **[FAR subpart]37.5** and OFPP Policy Letter 93-1 for guidance in addressing these considerations.

(3) The HCA resolves any disagreement regarding the requirements official's determination, following the guidelines in FAR **[subpart]7.5**. The HCA may delegate this authority to a level not lower than the contracting director.

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