

CWS Guidelines:

This paper provides a list of governmentwide contract writing system (CWS) guidelines. The guidelines should be used as a basis for agencies as they develop requirements to procure a CWS. They should also be used by agencies to ensure their current CWS are meeting the guidelines established. CWS providers should also take note of the guidelines to ensure their systems are working in accordance with governmentwide expectations. Not all systems will use the same functionality, so these guidelines are intended for agencies to choose some, all, or none, to fit their needs.

All systems must be compliant and up to date with the requirements set forth in the Federal Acquisition Regulations (FAR).

Updates of FAR clauses should be done how many days after FAC issuance:

Good	Better	Best
35 Days	20-30 Days	Less than 20 days

IAE API Changes are Implemented how many days after requirements are announced:

Good	Better	Best
6 months	3-5 months	1-2 months

Standard Forms are updated as mandated by the FAR how many days after issuance:

Good	Better	Best
60-90 days	31-59 days	1-30 days

Standard form changes must be treated like any other FAR changes which means they are a part of the operations and maintenance of the system. If a form changes and the system does not, then the system is considered not compliant with FAR requirements.

In accordance with OMB Circular A-137, contract data, to include line items, must be accessible by agencies and easily exportable for purposes of centralized data collection.

The CWS must be capable of allowing agencies to establish FPDS reporting thresholds in accordance with the FAR (i.e., the MPT varies depending on what you are buying, IDVs would typically have no money tied to it). The CWS shall not automatically require FPDS contract action reports for everything or just allow one reporting threshold for everything. This would make the system not compliant with the FAR.

FPDS has a number of 'generic xml tags' to allow the government to quickly collect new data without requiring a system version change. In order for a CWS to interface with FPDS it must be certified by GSA and one requirement of the certification is for the CWS to demonstrate that it can accommodate these generic tags.

If the system elects to pre-fill the Solicitation Issue Date in FPDS then it must not default the parent award solicitation issue date for task\delivery order\Blanket Purchase Agreement (BPA) call solicitation issue date. When the solicitation date is collected in FPDS, it is for the specific award being reported, not

the parent indefinite-delivery vehicle(IDV). The FPDS data dictionary spells out what date should be used in scenarios where there is no solicitation issued.

The system must not use the effective date as the period of performance start date for FPDS reporting.

The system must be capable of only reporting appropriated funds to FPDS. A system that reports both non-appropriated and appropriated funds in FPDS totals should be considered not compliant. Non-appropriated funds are not required to be reported to FPDS and the CWS should be able to remove those funds from the obligation amounts reported to FPDS.

The system must display and print the correct dollar amounts on the standard forms. Providers must use the acquisition.gov website under data initiatives and review the guide on standard forms and dollar amounts.

To the maxim extent possible, systems should be utilizing the combination of web and business service approached to FPDS reporting (i.e., not fully relying on one or the other). A reminder that any system using 100% business service reporting must meet the IAE FPDS blank field requirement and must request OMB and GSA IAE permission before adopting this approach.

The system must provide mapping by data elements whenever data is pre-filling information another system (for example: a system providing information to contract opportunities or FPDS, must provide a mapping of what data within its system is being mapped to what element in the other.)

The system must fully utilize APIs made available by the GSA\IAE. For example, the FPDS Correct API allows for corrections to be made, but CWS providers are not utilizing this functionality causing agencies to have to log in manually to make corrections; Contract Opportunities; etc.

The system should store provisions\clauses associated with procurement documents in a way that each provision\clause can be tracked and reported on.

The system must have a strong quality control process to ensure that items like provision\clause text, formatting, etc., is correct. This requirement is applicable to both federal and agency provisions\clauses.

The system must be compatible with the Invoice Payment Platform (IPP) requirements, unless an agency has a waiver.

Other examples of system non-compliance:

- 1.) Not allowing linking to an FPDS CAR created outside of the CWS to the contract in the CWS.
- 2.) Not using the Product Service Code (PSC) API. Uploading PSC changes from a spreadsheet or a pdf is time consuming and ineffective. The PSC API must be used to ensure the latest information is available for use as soon as possible.
- 3.) Not updating vendor tables appropriately from SAM.gov and instead just using vendor information stored locally. The latest vendor update to their registration should be available to the Contracting Officer (CO) for potential modifications or for a new award. Waiting 30 days to process a vendor update from SAM.gov causes data quality issues and is not an accurate reflection of the legal registration. When the CWS does not have the most up to date information, the government is put at risk for any resulting prompt payment interest penalties.

- 4.) Not updating Federal Acquisition Regulation (FAR) using the API. Providers should be using the following to update FAR clauses: <https://github.com/GSA/GSA-Acquisition-FAR>
- 5.) Not using IAE system APIs at all/incorrectly/or not timely: Providers still using extracts despite there being no agency technical restrictions on using APIs. Not using the latest APIs. Waiting for months after a new API is issued before adopting its use is not the correct process.
- 6.) Not updating the FPDS date signed field on execution of the award\mod.
- 7.) Only presenting an exclusion flag and not the exclusion effect.
- 8.) Allowing users to bypass FPDS reporting without a corresponding means of oversight (e.g., a report of those actions).
- 9.) Not mapping FPDS data elements correctly. Provider should be referring to the FPDS data dictionary or contacting the PCE representative.
- 10.) Defaulting the multi-award FPDS IDV field to Single award. This causes significant downstream reporting impacts for orders placed against multi-award IDVs that are wrongly reported as single awards.
- 11.) Not providing header text for each clause\provision. The FAR states that clauses specific to certain clins must be identified, thus requiring the need for header text.
- 12.) Not identifying fill-in clauses\provisions.
- 13.) Not allowing for agency deviations to provisions\clauses
- 14.) Not allowing for substantially the same as text for provisions\clauses.