Government agency customers please refer to your agency POC for help with GSA ordering

This letter has been prepared to give guidance to non-government entities under contract with the Federal Government ("contractors") on the correct ordering procedure for GSA Approved security containers and vault doors ("security equipment"). The following information can help direct you to useful resources, but will not do the work for you. You are responsible for working diligently with a contracting officer and taking action that is appropriate for your situation.

Summary:

- 1. Ensure your contract authorizes you to store classified material
- 2. Work with a contracting officer to set up an Activity Address Code
- 3. Order through FEDSTRIP/MILSTRIP or GSA Global Supply/Advantage!
- 4. Appendix A-E:
 - A. 41 CFR § 101-26.507 Security equipment
 - B. GSA Order OGP 4800.2I Eligibility to Use GSA Sources of Supply and Services
 - C. DLM 4000.25 Volume 6 Chapter 2.4.1.2 DoD Contractor DoDAACs
 - D. FAR Part 51 Use of Government Supply Sources by Contractors (Condensed)
 - E. PGI 251.102 Authorization to use Government supply sources

What is happening to the "exemption process"?

After October 1, exemptions to bypass Global Supply will no longer be given to federal contractors. ISOO Notice 2014-02 prescribes that security equipment "must now be procured through GSA Global Supply." In order to ensure the continued availability of security equipment, the exemption process was set up as a temporary means of procuring security equipment while contractors amended their contracts to comply with the ISOO Notice. As detailed in IACSE Letter "End of the Exemption Process" (May 30, 2019), sufficient time has passed since the ISOO Notice was issued for such changes to happen.

Why must security equipment be ordered through GSA?

GSA Approved security equipment is restricted for use only by the US Government and approved federal contractors. Using GSA ensures that all purchases are in compliance with Federal Regulations (**Appendix A**, CFR) and improves GSA's ability to ensure quality customer service. Moreover, it ensures that any security equipment you purchase meets federal testing requirements and specifications.

1. AUTHORIZATION TO STORE CLASSIFIED MATERIAL:

GSA Order OGP 4800.2I specifies that contractors who are required to maintain custody of classified information are permitted to purchase security equipment through GSA sources (**Appendix B**, GSA

Order). Your contract must include a DD Form 254 (or equivalent), which provides classification requirements and guidance to the contractor.

2. ACTIVITY ADDRESS CODE:

What is an Activity Address Code?

An Activity Address Code (AAC, DoDAAC for DoD customers, and sometimes referred to as a GSA Account Code) is a six digit code "that uniquely identifies a unit, activity, or organization that has the authority to requisition, contract for, receive, have custody of, issue, or ship government owned assets, or fund/pay bills for materials and/or services" (DLA FAQ 19). The codes are used when ordering supplies from the government supply system with FEDSTRIP, MILSTRIP, or DLMS. The AAC also stores payment and shipment information. Orders for GSA-supplied items (like security containers) must be placed with an AAC or government purchase card.

Who can have an AAC?

If your contract authorizes you to store classified material, you can apply for an

AAC. How do I get an AAC?

Work with a contracting officer who is familiar with your contract to take appropriate steps.

DoD contractors can request a DoDAAC through the Contractor DoDAAC request module in the Procurement Integrated Enterprise Environment (PIEE) (**Appendix C**, DLM). That request will be validated against the relevant contract.

See **Appendix D**, FAR, for details of steps and information required to manually apply for an AAC. A contracting officer can fill out form PGI 251.102 (**Appendix E**), which follows along with FAR 51.102 to organize the required information.

3. ORDERING SECURITY EQUIPMENT:

Once you receive an AAC, see detailed ordering procedures here: https://www.gsa.gov/buying-selling/purchasing-programs/requisition-programs/gsa-global-supply/nsns-and-productlines/security-containers

These procedures are summarized below.

Ordering through GSA Global Supply

If you have an account or can set one up, ordering through GSA Global Supply or Advantage is the easiest option (Requires and approved email domain such as .gov or .mil). You may place your order on-line via GSA Global Supply at: www.gsaglobalsupply.gsa.gov or GSA Advantage at: https://www.gsaadvantage.gov. Both sites function 24/7, enabling users to place orders from anywhere in the world, and offer electronic equivalents of traditional requisition forms DD 1348 or SF 344.

Payment: GSA Global Supply accepts your GPC or direct billing through your AAC or

DoDAAC. Shipping/Freight Charges: GSA prices are FOB origin, Freight - prepay and add.

Ordering with FEDSTRIP/MILSTRIP

Orders can be placed "offline" through DD Form 1348 (MILSTRIP) or Standard Form 344 (FDSTRIP). Copies of these forms are at the ordering procedures link above.

Please submit your completed forms to GSA's Requisitioning Processing & Customer Center at: rpc@gsa.gov and copy the Security Container Team at: securitycontainers@gsa.gov.

Instructions for MILSTRIP:

https://www.gsa.gov/cdnstatic/MILSTRIP_Instructions.pdf

Instructions for FEDSTRIP:

https://www.gsaadvantage.gov/images/muffin/fedstrip_guide_2006.pdf

Special Requests

If you are requesting a specific manufacturer, expedited delivery or require a lift gate and/or inside delivery, please e-mail the Security Container general mailbox at: securitycontainers@gsa.gov. In your email reference your requisition number and state your special request. If you place your order on-line via GSA Advantage or GSA Global Supply, please forward a copy of your confirmation e-mail, to include your special request information.

Additional Information:

DoD Lock Program – One stop tool for technical information and updates to the security program https://www.navfac.navy.mil/navfac_worldwide/specialty_centers/exwc/products_and_services/capital_improvements/dod_lock_html

DLA FAQ

https://www.dla.mil/HQ/InformationOperations/Defense-Logistics-Management-Standards/fag/

GSA Supply Catalog 2020 (see pg. 260-267 for containers)

https://cmls.gsa.gov/servlet/servlet.FileDownload?retURL=%2Fapex%2FCMLSPubCategory%3FsearchKey%3D05-19 - 00382&file=00Pt000000Fe72HEAR

4. APPENDIX:

Appendix A. 41 CFR § 101-26.507 – Security equipment

Federal agencies and other activities authorized to purchase security equipment through GSA sources shall do so in accordance with the provisions of this § 101-26.507. Under section 201 of the Federal Property and Administrative Services Act of 1949 (40 U.S.C. 481), the Administrator of GSA has determined that fixed-price contractors and lower tier subcontractors who are required to protect and maintain custody of security classified records and information may purchase security equipment from GSA sources. Delivery orders for security equipment submitted by such contractors and lower tier subcontractors shall contain a statement that the security equipment is needed for housing Government security classified information and that the purchase of such equipment is required to comply with the security provision of a Government contract. In the event of any inconsistency between the terms and conditions of the delivery order and those of the Federal Supply Schedule contract, the latter shall govern. Security equipment shall be used as prescribed by the cognizant security office.

[60 FR 19675, Apr. 20, 1995]

Appendix B. GSA Order OGP 4800.2I – Eligibility to Use GSA Sources of Supply and Services

7. Eligible activities.

Organizations are eligible to use GSA sources of supply and services pursuant to 40 U.S.C. §§ 501 - 502 or other statutory authority; however, some organizations may be eligible to use only specific GSA sources of supply or services. In addition, although an organization may be eligible to use GSA sources of supply, particular sources may not be accessible due to limits of supply sources or geographical constraints. For example, in the case of GSA Fleet, it may not be practical for GSA to make certain sources of supply available. In addition, the terms of a specific contract may not permit participation by otherwise eligible organizations. Other organizations authorized under the authority of 40 U.S.C. §§ 501 - 502. GSA has determined that certain organizations, other than those described above, are eligible to use its sources of supply and services under the authority provided to the Administrator by 40 U.S.C. §§ 501 - 502.

d. Other organizations authorized under the authority of 40 U.S.C. §§ 501 - 502.

GSA has determined that certain organizations, other than those described above, are eligible to use its sources of supply and services under the authority provided to the Administrator by 40 U.S.C. §§ 501 - 502.

(3) Fixed-price contractors (and subcontractors) purchasing **security equipment**. Under 40 U.S.C. § 501, the Administrator has determined that fixed-price contractors and lower-tier subcontractors who are required to maintain custody of security classified records and information may purchase security equipment from GSA. Procedures for such acquisitions are set forth in 41 CFR 101-26.507.

Appendix C. <u>DLM 4000.25 Volume 6 Chapter 2 – **DoD Contractor DoDAACs**</u>

2.4.1.2: DoD contractors (CTR) will only be assigned DoDAACs if they have a contract with DoD that authorizes access to DoD supply system material or to provide services such as maintenance/repair that require a shipping address. Contractor DoDAACs may be requested by anyone related to the contract/program through the Contractor DoDAAC request module in the Procurement Integrated Enterprise Environment (PIEE). The requestor will indicate whether the DoDAAC should have requisitioning authority or just be a shipping location. Requisitioning DoDAAC requests will be validated against the contract to confirm the contract allows such authority. In addition to appropriate address information, requestors will ensure the following contract information data elements are entered for every contractor DoDAAC. All are mandatory fields except for Order Number and Contract Period of Performance End date, which are situationally dependent (for all non-contractor DoDAACs, these fields are disabled).

Appendix D. FAR Part 51 – Use of Government Supply Sources by Contractors (Condensed)

51.101 Policy.

- (a) If it is in the Government's interest, and if supplies or services required in the performance of a Government contract are available from Government supply sources, contracting officers may authorize contractors to use these sources in performing
 - (1) Government cost-reimbursement contracts;
 - (2) Other types of negotiated contracts when the agency determines that a substantial dollar portion of the contractor's contracts are of a Government cost-reimbursement nature; or
- (b) Contractors with fixed-price Government contracts that require protection of security classified information may acquire security equipment through GSA sources (see 41 CFR 101-26.507).

51.102 Authorization to use Government supply sources.

- (a) Before issuing an authorization to a contractor to use Government supply sources in accordance with 51.101(a) or (b), the contracting officer shall place in the contract file a written finding supporting issuance of the authorization. A written finding is not required when authorizing use of Government supply sources in accordance with 51.101(c). Except for findings under 51.101(a)(3), the determination shall be based on, but not limited to, considerations of the following factors:
 - (1) The administrative cost of placing orders with Government supply sources and the program impact of delay factors, if any.
 - (2) The lower cost of items available through Government supply sources.
 - (3) Suitability of items available through Government supply sources.
 - (4) Delivery factors such as cost and time.
 - (5) Recommendations of the contractor.
- (b) Authorizations to subcontractors shall be issued through, and with the approval of, the contractor.
- (c) Upon deciding to authorize a contractor to use Government supply sources, the contracting officer shall request, in writing, as applicable-
 - (1) A FEDSTRIP activity address code, through the agency's central contact point for matters involving activity address codes, from the General Services Administration (GSA) FXS Washington, DC 20406;
 - (2) A MILSTRIP activity address code from the appropriate Department of Defense (DoD) service point listed in Section1 of the Introduction to the DoD Activity Address Directory;
- (d) Each request made under paragraph (c) of this section shall contain-
 - (1) The complete address(es) to which the contractor's mail, freight, and billing documents are to be directed; (2) A copy of the contracting officer's letter of authorization to the contractor;
 - (3) The prime contract number(s); and
 - (4) The effective date and duration of each contract.
- (e) In each authorization to the contractor, the contracting officer-
 - (1) Shall cite the contract number(s) involved;
 - (2) Shall, when practicable, limit the period of the authorization;

- (3) Shall specify, as appropriate, that-
 - (i) When requisitioning from GSA or DoD, the contractor shall use FEDSTRIP or MILSTRIP, as appropriate, and include the activity address code assigned by GSA or DoD;

51.103 Ordering from Government supply sources.

(a) Contractors placing orders under Federal Supply Schedules shall follow the terms of the applicable schedule and authorization and include with each order-

GSA APPROVED SECURITY EQUIPMENT - PURCHASING GUIDE

- (1) A copy of the authorization (unless a copy was previously furnished to the Federal Supply Schedule contractor); and
- (2) The following statement: This order is placed under written authorization from _____ dated ____. In the event of any inconsistency between the terms and conditions of this order and those of your Federal Supply Schedule contract, the latter will govern.
- (b) Contractors placing orders for Government stock shall-
 - (1) Comply with the requirements of the contracting officer's authorization, using FEDSTRIP or MILSTRIP procedures, as appropriate;
 - (2) Use only the Government activity address code obtained by the contracting officer in accordance with <u>51.102(e)</u> along with the contractor's assigned access code, when ordering from GSA Customer Supply Centers. (3) Order only those items required in the performance of their contracts.

51.104 Furnishing assistance to contractors.

After receiving an activity address code, the contracting officer will notify the appropriate GSA regional office or military activity, which will contact the contractor and-

- (a) Provide initial copies of ordering information and instructions; and
- (b) When necessary, assist the contractor in preparing and submitting, as appropriate-
 - (1) The initial FEDSTRIP or MILSTRIP requisitions, the <u>Optional Form 347</u>, or the agency-approved forms; (2) A completed GSA Form 457, FSS Publications Mailing List Application, so that the contractor will automatically receive current copies of required publications; or
 - (3) A completed GSA Form 3525, Application for Customer Supply Center Services and (Address Change).

Appendix E. PGI 251.102 – Authorization to use Government supply sources.

Use a format substantially the same as the following when authorizing contractor use of Government Supply Sources. Specify the terms of the purchase, including contractor acceptance of any Government materiel, payment terms, and the addresses required by paragraph (e) of the clause at 252.251-7000, ordering from Government Supply Sources.

AUTHORIZATION TO PURCHASE FROM GOVERNMENT SUPPLY SOURCES

(SAMPLE FORMAT)

SUBJECT: Authorization to Purchase from Government Su	upply Sources	
	(Contractor's Name)	
	(Contractor's Address)	
	(CAGE Code)	
1. You are hereby authorized to use Government sources [insert the requiring activity's DoD Activity Address Code (authority given to the contractor.]		for purchasing

2.a. Purchase Orders Under Federal Supply Schedules or Personal Property Rehabilitation Price Schedules. Place orders in accordance with the terms and conditions of the attached Schedule(s) and this authorization. Attach a copy of this authorization to the order (unless a copy was previously furnished to the Federal Supply Schedule or
Personal Property Rehabilitation Price Schedule contractor). Insert the following statement in the order:
This order is placed under written authorization from dated(*). In the event of any inconsistency between the terms and conditions of
this order and those of the Federal Supply Schedule or Personal Property Rehabilitation Price Schedule contract, the latter will govern.
b. Requisitioning from the General Services Administration (GSA) or the Department of Defense (DoD). Place orders in accordance with this authorization and, as appropriate, the following:
(1) Federal Standard Requisitioning and Issue Procedures (FEDSTRIP) (GSA FEDSTRIP Operating Guide: FPMR 101-26.2 (41 CFR 101-26.2)). Copies are available from the Superintendent of Documents, Government Printing Office, Washington, DC 20402; telephone (202) 512-1800; facsimile (202) 512-2250.
(2) Military Standard Requisitioning and Issue Procedures (MILSTRIP) (DoD 4000.25-1-M). Copies are available from the Defense Logistics Agency, Administrative Support Center East, ATTN: ASCE-WS, 14 Dedication Drive, Suite 3, POD 43, New Cumberland, PA 17070-5011; telephone 1-888-DLA-PUBS(352-7827), or (717) 770-6034; facsimile (717) 770-4817.
c. Enterprise Software Initiative. Place orders in accordance with the terms and conditions of the attached Enterprise Software Agreement(s), or instructions for obtaining commercial software or software maintenance from Enterprise Software Initiative inventories, and this authorization. Attach a copy of this authorization to the order (unless a copy was previously furnished to the Enterprise Software Agreement contractor). Insert the following
7 GSA APPROVED SECURITY EQUIPMENT - PURCHASING GUIDE
statement in the order:
This order is placed under written authorization from dated
3. [Insert other provisions as necessary.]
4. This authority is not transferable or assignable.
5. The DoD Activity Address Directory (DoDAAD) (DLM 4000.25, Volume 6, Chapter 2) Activity Address Code** to which this Authorization applies is
6. This Authorization expires
(Contracting Officer)

^{*} Insert "a copy of which is attached," "a copy of which you have on file," or other suitable language, as appropriate.

** The requiring activity assumes responsibility for monitoring and controlling all activity address codes used in the letters of authority.

PGI 251.102-70 Contracting office responsibilities.

- (a) The DoD Activity Address Code (DoDAAC) assigned in accordance with paragraph 5 of the authorization format in PGI 251.102 (DFARS/PGI view) shall be assigned to the contractor for authorization to use Government supply sources only for the contract number cited in paragraph 1 of the authorization format.
- (b) The authorization to use Government sources of supply is unique to each contract and shall not be transferred or assigned to any other contractor or contract. Therefore, the same DoDAAC shall not be assigned to any other contract number during the period of performance for the contract. After 24 months has lapsed beyond contract closeout, the DoDAAC may be reused for another contract.