

USDA Acquisition Data Reporting Policy References

[Federal Acquisition Regulation 4.6](#) on Contract Reporting requires contract actions (see definition below) above the micro-purchase threshold to be reported to the Federal Procurement Data System (FPDS), but also provides several exemptions and exclusions, highlighted/bolded font below –

4.601 Definitions.

As used in this subpart—

“*Contract action*” means any oral or written action that results in the purchase, rent, or lease of supplies or equipment, services, or construction using appropriated dollars over the micro-purchase threshold, or modifications to these actions regardless of dollar value. **Contract action does not include grants, cooperative agreements, other transactions, real property leases, requisitions from Federal stock, training authorizations, or other non-FAR based transactions.**

“*Contract action report (CAR)*” means contract action data required to be entered into the Federal Procurement Data System (FPDS).

“*Definitive contract*” means any contract that must be reported to FPDS other than an indefinite delivery vehicle. This definition is only for FPDS and is not intended to apply to Part 16.

“*Entitlement program*” means a Federal program that guarantees a certain level of benefits to persons or other entities who meet requirements set by law, such as Social Security, farm price supports, or unemployment benefits.

“*Generic entity identifier*” means a number or other identifier assigned to a category of vendors and not specific to any individual or entity.

“*Indefinite delivery vehicle (IDV)*” means an indefinite delivery contract or agreement that has one or more of the following clauses:

- (1) 52.216-18, Ordering.
- (2) 52.216-19, Order Limitations.
- (3) 52.216-20, Definite Quantity.
- (4) 52.216-21, Requirements.
- (5) 52.216-22, Indefinite Quantity.
- (6) Any other clause allowing ordering.

4.606 Reporting Data.

(a) *Actions required to be reported to FPDS.*

(1) As a minimum, agencies must report the following contract actions over the micro-purchase threshold, regardless of solicitation process used, and agencies must report any modification to these contract actions that change previously reported contract action data, regardless of dollar value:

(i) Definitive contracts, including purchase orders and imprest fund buys over the micro-purchase threshold awarded by a contracting officer.

(ii) Indefinite delivery vehicle (identified as an “IDV” in FPDS). Examples of IDVs include the following:

(A) Task and Delivery Order Contracts (see subpart 16.5), including—

- (1) Government-wide acquisition contracts.
- (2) Multi-agency contracts.

(B) GSA Federal supply schedules.

(C) Blanket Purchase Agreements (see 13.303).

(D) Basic Ordering Agreements (see 16.703).

(E) Any other agreement or contract against which individual orders or purchases may be placed.

(iii) All calls and orders awarded under the indefinite delivery vehicles identified in paragraph (a)(1)(ii) of this section.

(2) The GSA Office of Charge Card Management will provide the Government purchase card data, at a minimum annually, and GSA will incorporate that data into FPDS for reports.

(3) Agencies may use the FPDS Express Reporting capability for consolidated multiple action reports for a vendor when it would be overly burdensome to report each action individually. When used, Express Reporting should be done at least monthly.

(b) *Reporting Other Actions.* Agencies may submit actions other than those listed at paragraph (a)(1) of this section only if they are able to be segregated from FAR-based actions and this is approved in writing by the FPDS Program Office. Prior to the commencement of reporting, agencies must contact the FPDS Program Office if they desire to submit any of the following types of activity:

(1) Transactions at or below the micro-purchase threshold, except as provided in paragraph (a)(2) of this section.

(2) Any non-appropriated fund (NAF) or NAF portion of a contract action using a mix of appropriated and non-appropriated funding.

(3) Lease and supplemental lease agreements for real property.

(4) Grants and entitlement actions.

(c) *Actions not reported.* The following types of contract actions are not to be reported to FPDS:

(1) Imprest fund transactions below the micro-purchase threshold, including those made via the Government purchase card (unless specific agency procedures prescribe reporting these actions).

(2) Orders from GSA stock and the GSA Global Supply Program.

(3) Purchases made at GSA or AbilityOne service stores, as these items stocked for resale have already been reported by GSA.

(4) Purchases made using non-appropriated fund activity cards, chaplain fund cards, individual Government personnel training orders, and Defense Printing orders.

(5) Actions that, pursuant to other authority, will not be entered in FPDS (e.g., reporting of the information would compromise national security).

(6) Contract actions in which the required data would constitute classified information.

(7) Resale activity (i.e., commissary or exchange activity).

(8) Revenue generating arrangements (i.e., concessions).

(9) Training expenditures not issued as orders or contracts.

(10) Interagency agreements other than inter-agency acquisitions required to be reported at 4.606(a)(1).

(11) Letters of obligation used in the A-76 process.

(d) Agencies not subject to the FAR. Agencies not subject to the FAR may be required by other authority (e.g., statute, OMB, or internal agency policy) to report certain information to FPDS. Those agencies not subject to the FAR must first receive approval from the FPDS Program Office prior to reporting to FPDS.

[USDA Procurement Advisory 105C](#) established a policy requiring Agencies within the Department to use automated procurement systems for all acquisition actions exceeding the micro-purchase threshold. The primary USDA automated procurement system, the Integrated Acquisition System (IAS), automatically feeds data to FPDS for reporting purposes. Other automated systems in use are Forest Service systems for incident management, and the Web Based Supply Chain Management (WBSCM) System for food commodity procurements. However, this policy also established exclusions for those actions for which automated procurement systems are not required to be used. These actions may show up in FMMI transaction reports without PIIDs. Some of these are still required by the FAR to be reported, but others tie to FAR reporting exclusions –

5. EXCLUSIONS

Automated procurement systems are not required for the following:

- a. Aviation contracts
- b. Stewardship contracts (*i.e., contracts awarded under the Stewardship Authority, including Integrated Resource Timber Contracts, Integrated Resource Service Contracts, and Stewardship Service Contracts*)
- c. Acquisitions from Federal agencies, which are processed through Intragovernmental Payments and Collections (IPAC), unless marked in IAS for payment via purchase card
- d. Acquisitions in support of all risk incidents (*e.g., fire suppression, hurricanes, floods, or other natural disasters*) if a suitable system is not available due to urgency or geographic location
- e. Telecommunications and utilities that are paid through third party billing services (*e.g., cellular telephone service, other wireless communications, utilities through commercial vendors*)
and
- f. General Services Administration (GSA) Capital Leasing transactions.