



**DEPARTMENT OF THE ARMY**  
HEADQUARTERS, U.S. ARMY MEDICAL RESEARCH AND DEVELOPMENT COMMAND  
810 SCHREIDER STREET  
FORT DETRICK, MARYLAND 21702-5000

FCMR-AAP-A

02 July 2020

MEMORANDUM FOR U.S. Army Medical Research and Development Command Employees

SUBJECT: Procurement Advisory Notice 20-05\* Government Furnished Property Procedures, Managing, and Tracking Requirements

1. PURPOSE: The purpose of this Procurement Advisory Notice (PAN) is to communicate the procedures for providing Government Furnished Property (GFP) to contractors performing under Government contracts and managing the GFP through the Department of Defense (DoD) Procurement Integrated Enterprise Environment (PIEE) GFP Module.

2. REFERENCES:

- a. Federal Acquisition Regulation (FAR) Part 45 Government Property
- b. Defense Federal Acquisition Regulation Supplement (DFARS) Part 245 and Procedures, Guidance, and Information (PGI) 245 Government Property
- c. Army Federal Acquisition Regulation Supplement (AFARS) Part 5145 Government Property
- d. DoD Instruction 4161.02 Accountability and Management of Government Contract Property
- e. DoD Instruction 5000.64 Accountability and Management of DoD Equipment and Other Accountable Property
- f. DoD Procurement Toolbox <https://dodprocurementtoolbox.com/>
- g. DoD Other Transactions Guide November 2018. Title to Property.

---

\*This PAN supersedes PAN 17-02 - USAMRAA Additional Requirements in the Application of Exceptions to Government Property (GP) Management Requirements dated 10 November 2016

3. BACKGROUND:

a. As prescribed in FAR 45.102 (a) contractors are ordinarily required to furnish all property necessary to perform Government contracts.

b. As defined in FAR 45.101, Government property means all property owned or leased by the Government. Government property includes both GFP and contractor-acquired property (CAP). Government property includes material, equipment, special tooling, special test equipment, and real property. Government property does not include intellectual property and software.

c. CAP means property acquired, fabricated, or otherwise provided by the contractor for performing under a time-and-material or cost-reimbursement type contract or contract line item, to which the Government has title. CAP can be consumed, incorporated into an end-item deliverable, delivered under the contract, converted to GFP, repurchased by the contractor, or go through other disposition procedures as described in FAR 45.602-2. CAP that is consumed, incorporated into an end-item deliverable, delivered, or repurchased is not subject to procedures described herein.

d. GFP is property in the possession of, or directly acquired by, the Government and subsequently furnished to the contractor for performance on a contract. GFP includes, but is not limited to, spares and property furnished for repairs, maintenance, overhaul, or modification. GFP also includes CAP when it is a deliverable under a contract, accepted by the Government, and authorized for continued use under the contract.

e. As described in FAR 45.000, GFP does not include:

(1) Government property provided under any statutory leasing authority, except as to non-Government use of property under FAR 45.301(f);

(2) Property to which the Government has acquired a lien or title solely because of partial, advance, progress, or performance based payments;

(3) Disposal of real property;

(4) Software and intellectual property;

(5) Government property that is incidental to the place of performance, when the contract requires contractor personnel to be located on a Government site or installation, and when the property used by the contractor within the location remains accountable to the Government. Items considered to be incidental to the place of performance include, for example, office space, desks, chairs, telephones, computers, and fax machines. Generally smartphones and laptops are portable devices that do not

FCMR-AAP-A

SUBJECT: Procurement Advisory Notice 20-05\* Government Furnished Property Procedures, Managing, and Tracking Requirements

consistently remain onsite at the Government location. Therefore, these items are to be considered GFP and are subject to the procedures herein.

f. For Other Transactions (OTs) awarded under 10 U.S.C. § 2371 and 2371b, the Government is not required to, and generally should not, take title to physical property acquired or produced by a private party signatory to an OT, except property the agreement identifies as a deliverable. In deciding whether or not to take title to property under an OT, the Government should consider whether known or future efforts may be fostered by Government ownership of the property. If the Government takes title to property or furnishes Government property, then the property is subject to the Federal Property and Administrative Services Act and the procedures described herein apply for tracking, managing, transferring, and disposition of Government property.

4. DOCUMENTATION REQUIREMENTS: FAR 45.102(b), DFARS 245.103-71, and DFARS PGI 245.103-70 detail the documentation requirements which must be satisfied and clearly demonstrate: (1) Providing the property is in the Government's best interest; (2) That the overall benefit to the acquisition significantly outweighs the increased cost of administration, including ultimate property disposal; (3) That providing the property does not substantially increase the Government's assumption of risk; and (4) That Government requirements cannot otherwise be met. The Contracting Officer is responsible for ensuring each required element is satisfied and documented by the requiring activity prior to furnishing Government Property to contractors. A sample justification can be found on Contracting Compass at <https://spcs3.kc.army.mil/asaalt/procurement/Compass/SitePages/Samples.aspx>.

#### 5. SYSTEM ACCESS REQUIREMENTS:

a. GFP is managed and tracked through the GFP Module of PIEE. Government personnel requiring access to the GFP Module must first register for PIEE access at <https://pieetraining.eb.mil/piee-landing/> and then request GFP roles separately. Contracting Officer Representatives (CORs) and other requiring activity personnel may require all of the following GFP roles: GFP Initiator, GFP Reviewer, Government Property Shipper, and/or Government Receiver (Property). Contractor support personnel are eligible to request these roles as well. You can request multiple roles in a single request session. Detailed instructions including screenshots can be found in the DoD Procurement Toolbox "How to request GFP Module Roles" Troubleshooting Aide available at <https://dodprocurementtoolbox.com/site-pages/gfp-attachments>.

b. Your request for access is routed to your supervisor for action and then to the designated Government Administrator (GAM) for approval. You can find the GAM responsible for your organization by scrolling to the bottom of the home page and clicking on the "Lookup Tables" link under Support. Follow the "Who's my organization's GAM/CAM?" link and enter your organization's six-digit Department of

FCMR-AAP-A

SUBJECT: Procurement Advisory Notice 20-05\* Government Furnished Property Procedures, Managing, and Tracking Requirements

Defense Activity Address Code (DoDAAC) in the Location Code field. You can also access the link here:

<https://pieetraining.eb.mil/xhtml/unauth/help/helpWhosMyGAM.xhtml>.

## 6. TRACKING AND MANAGING GFP:

a. DFARS PGI 245.103-72 requires GFP to be listed as an attachment to solicitations and contract awards. If GFP is provided under an existing award, a contract modification is required to incorporate the GFP Attachment. The GFP Attachment should accompany procurement requests, solicitations, and contract awards or modifications when GFP is anticipated. Accordingly, the GFP Attachment is considered part of the requirements package. The role required to create the GFP attachment in the PIEE GFP Module is the GFP Initiator or GFP Approver role.

b. There are four ways for a GFP initiator to create a GFP Attachment in the PIEE GFP Module: manual entry of data on the GFP Module, upload specific populated Excel template available for download from the GFP Module, reuse and modification of an approved GFP Attachment in the GFP Module, or XML submission (machine to machine). Manual entry is advised only for very small lists of GFP. To obtain the latest copy of the GFP Attachment Excel Template, log into the PIEE GFP Module as a GFP Initiator or GFP Approver. Then select the Documentation dropdown and select GFP Template Download. Alternatively, the GFP Attachment Excel Template as well as the instructions for importing the document into the PIEE GFP Module is available at the DoD Procurement Toolbox <http://dodprocurementtoolbox.org/site/detail/id/26>.

c. The PIEE GFP Module includes workflow routing capability. When creating the GFP attachment, you will need to select the GFP Approver and the GFP Reviewer(s). The GFP Approver is the Contracting Officer. Use USAMRAA's DoDACC, W81XWH, as the location code to populate a list of Contracting Officers. GFP Reviewers are personnel typically responsible for property management whose inventories, workloads, or area of responsibility would be impacted by furnishing the contractor Government property. Use the GFP Reviewer's DoDACC to select the GFP reviewer by name or function.

d. After preparing the GFP Attachment in the PIEE GFP Module, you must select "Create" to submit the GFP Attachment to the GFP Reviewer(s) and GFP Approver. If you "Save" the GFP Attachment it will reside in your saved folder rather than the history folder and will not move forward through workflow routing.

e. Once approved in the PIEE GFP Module, the GFP Attachment will be automatically uploaded to Electronic Document Access (EDA) if the related contract award, order, or modification is present in EDA. Once uploaded to EDA, the GFP Attachment status is "Approved." Since the GFP Attachment is generally prepared prior

FCMR-AAP-A

SUBJECT: Procurement Advisory Notice 20-05\* Government Furnished Property Procedures, Managing, and Tracking Requirements

to contract/modification execution, the GFP Attachment status will be “Approved – Not in EDA” until the contract/modification is executed and present in EDA.

f. When the requiring activity makes a material change to the type and/or quantity of GFP authorized for use under the contract, the GFP Attachment must be updated. The Contracting Officer must be notified of any GFP changes and any anticipated impact to the contract.

g. As part of the COR duties, the COR must validate the contractor’s GFP Inventory at least annually and upload the review within the Surveillance and Performance Monitoring Module (SPM) in PIEE. The COR automatically receives access to the SPM module when he/she is appointed as the COR for the contract in the Joint Appointment Module of PIEE. The COR is responsible for monitoring the contractor’s stewardship of GFP provided under the contract.

## 7. PROPERTY TRANSFER:

a. Once the GFP Attachment is approved and the contract action is awarded, the Government Property Shipper (requiring activity personnel) will transfer accountable property to the contractor. The Government Property Shipper will create a shipping document within the PIEE GFP Module Property Transfer which will alert the contractor to the incoming GFP. Only Government Property listed on the GFP Attachment can be transferred to the contractor. The Contractor Property Receiver will accept the incoming transfer via the GFP Module Property Transfer.

b. For CAP that will become GFP, the CAP must be listed as a Contract Line Item and deliverable in the contract as soon as it is identified in accordance with DFARS PGI 245.402-71. The contractor can then request to convert CAP to GFP using the PIEE GFP Module CAP Pre-Screening. The requirements listed in paragraph 4 above must be satisfied before providing the converted CAP as GFP on any contract. The Contracting Officer approves the CAP conversion request and the GFP Attachment is created and flows over to the corresponding contract/contract modification in EDA. CAP must be converted to GFP before it can be transferred.

c. When the GFP is no longer required under the contract and the contractor has been instructed to return the GFP back to the Government, the Contractor Property Shipper will create a shipping document within the PIEE GFP Module Property Transfer. The Government Receiver (requiring activity personnel) will accept the incoming property via the GFP Module Property Transfer.

d. If transferring GFP to another contractor or the same contractor under a different contract, you must satisfy the requirements identified in paragraph 4 of this document and prepare the GFP attachment for the gaining contract prior to executing the transfer.

FCMR-AAP-A

SUBJECT: Procurement Advisory Notice 20-05\* Government Furnished Property Procedures, Managing, and Tracking Requirements

When transferring to another contract/contractor, the Contractor Property Shipper will create a shipping document within the PIEE GFP Module Property Transfer. The gaining contract Contractor Receiver will accept the incoming property via the GFP Module Property Transfer.

#### 8. DISPOSITION:

a. The Government retains title for any Government property issued to the contractor as GFP and any CAP obtained during contract performance. The contractor is responsible for requesting disposition instructions from the Contracting Officer for Government property accountable under the contract. The Contracting Officer will provide the appropriate disposition instruction in accordance with FAR 45.602-2. In most cases, the GFP will be returned to the Government in accordance with the procedures identified in paragraph 7.c. for reutilization by the requiring activity. CAP must be converted to GFP using the process in paragraph 7.b. in order to be reutilized or transferred to another contract.

b. There are limited exceptions for basic and applied research performed at institutions of higher education or nonprofit organizations under FAR 52.245-1 Government Property, Alternate II that will allow the title of property to vest with the contractor upon acquisition rather than the Government. Discuss the specifics of the contract and contract clauses with the cognizant Contracting Officer.

c. For all Government property that has not been provided with disposition instruction, the contractor will follow the procedures identified in DFARS 252.245-7004 Reporting, Reutilization, and Disposal.

d. For Government property lost under a contract, the contractor must follow the procedures identified in DFARS 252.245-7002.

#### 9. CUSTOMER SUPPORT:

a. For questions on how to use the applications in PIEE, including the GFP Module and SPM, refer to the Web Based Training for the specific application by clicking the Help Training button on the PIEE Homepage.

b. For training webinars, resources, policy, and frequently asked questions regarding Government Property, refer to the Government Property section of the DoD Procurement Toolbox <https://dodprocurementtoolbox.com>.

c. For questions or concerns with the information on your contract or completing the GFP requirements for a requirements package, or annual GFP validation in SPM, please contact your Contracting Officer.

FCMR-AAP-A

SUBJECT: Procurement Advisory Notice 20-05\* Government Furnished Property Procedures, Managing, and Tracking Requirements

d. For technical support contact the Army PIEE helpdesk at [wawf\\_undel@ecedi.nit.disa.mil](mailto:wawf_undel@ecedi.nit.disa.mil) or the Ogden help desk via email at [disa.global.servicedesk.mbx.eb-ticket-requests@mail.mil](mailto:disa.global.servicedesk.mbx.eb-ticket-requests@mail.mil), or by telephone at 866-618-5988, 801-605-7095.

10. PROPONENT: The proponent for this PAN is the U.S. Army Medical Research Acquisition Activity Contract Execution Oversight (CEO) Branch. Please submit any comments, concerns, and suggestions to the CEO Branch e-mail address at [usarmy.detrick.medcom-usamraa.mbx.policy@mail.mil](mailto:usarmy.detrick.medcom-usamraa.mbx.policy@mail.mil).

Christopher E. Sherman  
Senior Contracting Official