

## **GSA ORDER**

Subject: General Services Administration Acquisition Manual; GSAR Case 2020-G525, Personal Identity Verification Requirements Clarification

1. Purpose. This order transmits a revision to the General Services Administration Acquisition Manual (GSAM) to clarify the requirements for Personal Identity Verification (PIV).
2. Background. Following internal procurement management reviews, GSA identified the need to improve certain credentialing administration processes for contractors. GSA is amending the GSAR to clarify the personal identity verification requirements in GSAR Clause 552.204-9. The clause currently references a very broad credentialing website, which does not clearly identify the requirements for contractors to follow. In addition, more detailed procedures for credentialing management are provided at GSAM 504.1370.
3. Effective date. July 26, 2021.
4. Explanation of changes. This amendment includes regulatory and non-regulatory changes. For full text changes of the amendment see Attachment A, GSAR/GSAM Text Line-In/Line-Out.

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

GSAR 517.2 (Options):

- 517.207 – Text is moved from regulatory to non-regulatory as this regards internal procedures.

GSAR 552.2 (Text of Provisions and Clauses):

- 552.204-9 – Revised the reference in paragraph (a) to a specific GSA PIV and Credentialing Handbook, rather than just a website.

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

GSAM 504.13 (Personal Identity Verification of Contractor Personnel):

- 504.1370 –
  - Removed duplicative language.

- Described who is responsible for managing PIV cards.
- Described automated changes implemented by GSA's Office of Mission Assurance.
- Added requirement to cancel PIV cards 30 days after contract expiration.
- Added requirement to verify PIV cards prior to exercising options.
- Outlined potential contract actions to take when contractors do not return PIV cards.

GSAR 517.2 (Options):

- 517.207 – Added a requirement for COs or CORs to conduct a PIV card review prior to exercising options.

5. Cancellation. Not applicable.
6. Point of contact. For clarification of content, contact Ms. Vernita Misidor, GSA Acquisition Policy Division, at [gsarpolicy@gsa.gov](mailto:gsarpolicy@gsa.gov).

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

## GSAM Text, Line-In/Line-Out

### GSAR Baseline: Change 131 effective 07/06/2021

- Additions to baseline made by deviation are indicated by [bold text in brackets]
- Deletions to baseline made by deviation 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 504 - Administrative Matters

\* \* \* \* \*

### Subpart 504.13 - Personal Identity Verification of Contractor Personnel

\* \* \* \* \*

504.1370 [GSA] Credentials and Access Management [Procedures].

(a) [General.] Procedures.

~~(1) The CIO P 2181.1 - GSA HSPD-12 Personal Identity Verification and Credentialing Handbook details the credentials and access management procedures for contracts or orders including FAR clause at 52.204-9, Personal Identity Verification of Contractor Personnel and GSAR clause at 552.204-9, Personal Identity Verification Requirements.~~

~~(2) The CIO P 2181.1 - GSA HSPD-12 Personal Identity Verification~~ [(PIV)] and Credentialing Handbook includes guidance for-

[(1)] (i) Managing [contract employee] credentials;

[(2)] (ii) Ensuring [contract employee] credentials are returned to the GSA Office of Mission Assurance [(OMA)] when a contractor employee [receives an unfavorable suitability determination,] leaves the contract or when a contract ends; and

[(3)] (iii) Disabling access to information technology when a contractor employee leaves the contract or when a contract ends.

~~(3) The CIO P 2181.1 - GSA HSPD-12 Personal Identity Verification and Credentialing Handbook, as well as additional resources for implementing the~~

credentials and access management requirements, can be found on GSA's Acquisition Portal at <https://insite.gsa.gov/acquisitionportal>.

(b) Delegating Responsibilities.

**[(1)] Contracting officers [must manage PIV cards, also referred to as “GSA Access Cards”, provided to contractor employees. Contracting officers may delegate this authority to a contracting officer’s representative.]**

**[(2) If delegated, the contracting officer]** must ensure any contracting officer's representative delegation letter includes language for credentials and access management responsibilities.

**[(3) The Government contracting official who requests PIV cards on behalf of a contractor employee is also referred to as a “requesting official” pursuant to CIO P 2181.1.]**

**[(4)]** Standard delegation language can be found on the Acquisition Portal at: <https://insite.gsa.gov/hspd12inprocurement>.

**[(c) Required Verifications. There are multiple types of verifications to ensure only contractor employees who require PIV cards have them.**

**(1) Automated verification.**

**(i) Contractors and authorized Government contracting officials are automatically notified prior to the end date of the contract period of performance listed in the Office of Mission Assurance (OMA) system GSA Credentialing and Identity Management System (GCIMS). PIV cards will be automatically inactivated 30 days after the period of performance.**

**(ii) If the contractor requires a PIV card beyond 30 days after the contract period of performance, the authorized Government contracting official must submit a contractor information worksheet (CIW) (GSA Form 850) to update GCIMS, including appropriate justification.**

**(iii) When a contractor is made inactive in GCIMS, GCIMS will send an email to contractors and authorized Government contracting officials notifying everyone that the contractor PIV card needs to be returned. If the contractor does not comply with the terms of the**

automated notification, the authorized Government contracting official shall take the actions listed in paragraph (d).

(iv) The contracting officer shall include documentation in the contract file, as necessary.

**(2) Manual verification.**

(i) Authorized Government contracting officials are required to conduct a PIV card review annually or prior to exercising an option (see 517.207(c)), whichever comes first, to verify the contract information in GCIMS is correct (e.g. contract number, contract period of performance, contractor point of contact).

(ii) Authorized Government contracting officials shall send a letter to contractors to determine the need for continued access of individual employees and for return of PIV cards, requesting a response within no more than 15 business days.

(iii) Authorized Government contracting officials are required to submit a contractor information worksheet (CIW) (GSA Form 850) to update GCIMS, as necessary.

(iv) The contracting officer shall include documentation in the contract file, as necessary.]

**[(d) The authorized Government contracting official shall take the following actions when contractors do not return PIV cards.**

**(1) Withhold Final Payment - COs may delay final payment under a contract if the contractor fails to comply with the PIV card requirements in accordance with paragraph (c) of FAR 52.204-9.**

**(2) Contractor Performance Assessment Rating System (CPARS) - If the authorized Government contracting official has been unsuccessful in retrieving PIV cards and other Government Furnished Equipment (GFE) from the vendor in accordance with FAR 52.245-1 Alternate 1, then the CO shall document this in CPARS. Assessment may be noted under the “management or business relations” or “other” section of the CPARS report.**

**(3) Suspension/Debarment Referral Considerations - For willful non-compliance, the CO shall refer the contractor to the Suspension and**

Debarment Official (SDO). The SDO will review the complaint and decide whether or not action should be taken against the contractor.

(4) Termination Considerations - If the contractor shows a pattern of willful non-compliance regarding PIV card requirements during the performance of the contract (e.g., annual review of PIV cards), the CO may terminate the contract.]

[(e) The CIO P 2181.1 - GSA HSPD-12 Personal Identity Verification and Credentialing Handbook, as well as additional resources for implementing the credentials and access management requirements, can be found on the Acquisition Portal at: <https://insite.gsa.gov/hspd12inprocurement.>]

\* \* \* \* \*

## Part 517 - Special Contracting Methods

\* \* \* \* \*

### Subpart 517.2 - Options

\* \* \* \* \*

#### ~~517.207 Exercise of options.~~

~~In addition to the requirements of FAR 17.207, the contracting officer must also:~~

~~(a) Document the contract file with the rationale for an extended contractual relationship if the contractor's performance rating under the contract is less than satisfactory.~~

~~(b) Determine that the option price is fair and reasonable.~~

#### [517.207 Exercise of options.

In addition to the requirements of FAR 17.207, the contracting officer must also:

(a) Document the contract file with the rationale for an extended contractual relationship if the contractor's performance rating under the contract is less than satisfactory.

(b) Determine that the option price is fair and reasonable.]

(c) The consideration of other factors as prescribed by FAR 17.207(c)(3) should also include consideration of any tiered solutions (see subpart 507.71) or mandated solutions that were otherwise not available at the time of award.

**[(d) Conduct a Personal Identity Verification card review to determine the need for continued access, see 504.1370(c). This function may be delegated to the COR.]**

\* \* \* \* \*

## **Part 552 - Solicitation Provisions and Contract Clauses**

\* \* \* \* \*

### **552.204-9 Personal Identity Verification Requirements.**

As prescribed in 504.1303, insert the following clause:

**Personal Identity Verification Requirements (~~Oct 2012~~) [(DATE)]**

(a) The contractor shall comply with GSA personal identity verification requirements, identified **[in the CIO P 2181.1 GSA HSPD-12 Personal Identity Verification and Credentialing Handbook]** at <http://www.gsa.gov/hspd12>, if contractor employees require access to GSA controlled facilities or information systems to perform contract requirements. **[The contractor can find the CIO policy and additional information at <http://www.gsa.gov/hspd12>.]**

(b) The Contractor shall insert this clause in all subcontracts when the subcontractor is required to have access to a GSA-controlled facility or access to a GSA-controlled information system.

(End of clause)

\* \* \* \* \*