MEMORANDUM FOR COMMANDER UNITED STATES SPECIAL OPERATIONS COMMAND (ATTN: ACQUISITION EXECUTIVE)
COMMANDER, UNITED STATES TRANSPORTATION COMMAND (ATTN: ACQUISITION EXECUTIVE)
DEPUTY ASSISTANT SECRETARY OF THE ARMY (PROCUREMENT)
DEPUTY ASSISTANT SECRETARY OF THE NAVY (ACQUISITION & LOGISTICS MANAGEMENT)
DEPUTY ASSISTANT SECRETARY OF THE AIR FORCE (CONTRACTING)
DIRECTORS, DEFENSE AGENCIES
DIRECTORS, DOD FIELD ACTIVITIES

SUBJECT: Importance of Ensuring Accuracy of Procurement Instrument Identification Numbers (PIINs) and Supplementary PIINs (SPIINs)

This memorandum is to remind all Agencies and contracting officers of the importance of accurately assigning PIINs and SPIINs in accordance with Defense Federal Acquisition Regulation Supplement (DFARS) 204.70. The importance of this grows more critical each day, as decision-makers rely on the data reported about contract awards and as initiatives such as the Federal Funding Accountability and Transparency Act require the integrated use of the PIIN and SPIIN identifiers with other federal-wide and DoD-wide systems. There are four specific numbering topics discussed in this memorandum.

(1) If a procurement instrument allows for ordering during its period of performance against any or all of its line items, it shall be assigned a number carrying the appropriate code in the ninth position of the PIIN as an Indefinite Delivery contract (D), Blanket Purchase Agreement (A), or Basic Ordering Agreement (G) in accordance with DFARS 204.7003. This assignment is independent of which contract types at FAR 16.2, 16.3, 16.4, or 16.6 are applied to the contract and its line items.

(2) Second, when awarding a BPA under a Federal Supply Schedule in accordance with FAR Part 8 procedures, follow the instruction at DFARS 204.7003(a)(3)(i) and use an ‘A’ as the ninth character of the PIIN. This is imperative to ensure that the Federal Procurement Data System (FPDS) applies the correct competition data calculations. A DFARS or Procedures, Guidance,
and Information (PGI) will be opened to clarify the current wording to ensure clear understanding.

(3) Third, orders against a DoD issued ordering instrument (BPA, BOA or indefinite delivery type contract) shall be identified using a four character order number as described at DFARS 204.7004.

(4) Finally, the PIIN and SPIIN assigned to the contract action when awarded shall be used to identify the action with the contractor, on all documentation, and when shared or otherwise reported electronically to other systems unless changed by a modification per the instructions at DFARS 204.7001(c). Agencies shall not otherwise change the PIIN or SPIIN or provide ‘administrative numbers’ instead of the PIIN and/or SPIIN. For example, the contract and/or order number reported to the Federal Procurement Data System for a particular action shall match the PIIN and/or SPIIN on the actual contract action.

Agencies not following these practices shall cease their current procedures immediately and begin to comply with the DFARS numbering requirements. Additionally, agencies shall review their current open contracts for improperly numbered PIINs and SPIINs. If there are any current open contracts that have ordering provisions but are incorrectly numbered with a ‘C’ in the ninth position of the PIIN, I ask that you undertake efforts to correct it in accordance with the procedures identified at DFARS 204.7001(c). Open contracts in this situation that allow other DoD or federal agencies to order against it must be corrected and a ‘continued’ contract with correct PIIN issued (and reported to FPDS and Electronic Document Access (EDA)) not later than September 30, 2010 so that FY11 data for these agencies can be captured correctly.

My action officer for these instructions is Lisa Romney, lisa.romney@osd.mil, 703-602-8007. If your agency has any difficulty immediately complying with this instruction, please provide a schedule for compliance by July 31, 2010. I ask that the TRICARE Management Activity (#1) and Defense Logistics Agency (#1, #3 and #4) specifically provide remediation plans by July 31, 2010 for the issues identified.

Shay D. Assad
Director, Defense Procurement and Acquisition Policy