

SEP 28 2017



**UNITED STATES DEPARTMENT OF COMMERCE**  
**Chief Financial Officer and**  
**Assistant Secretary for Administration**  
Washington, D.C. 20230

**PROCUREMENT MEMORANDUM 2017- 06**

**ACTION**

**MEMORANDUM FOR:** Senior Bureau Procurement Officials  
Heads of Contracting Offices

**FROM:** Barry E. Berkowitz *[Signature]*  
Senior Procurement Executive and  
Director for Acquisition Management

**SUBJECT:** Class Deviation from the Federal Acquisition Regulation (FAR) to  
Delay Transition to new Procurement Instrument Identifiers (PIID)

**Background**

In June 2011, the President created the Government Accountability and Transparency Board (GAT Board) and tasked the board to, among other things, recommend ways to improve tracking of Federal spending data. Recommendation #3 of the GAT Board called for the Federal Government to implement a uniform award identification system to promote uniform and consistent data and enhance transparency to the public of Federal spending data. In response to the recommendation, on October 14, 2014 the Federal Acquisition Regulation (FAR) was amended to implement a uniform procurement instrument identification numbering system in order to standardize procurement transactions across the Federal Government. The final FAR rule requires agencies to transition to the new PIID numbering scheme no later than October 1, 2017.

In order to implement the changes to the PIID numbering structure, changes to the Department of Commerce's Core Financial System (CFS) and Contract Writing System are required. It was initially determined that the changes impacting both systems could be accomplished by the October 1, 2017 deadline. However, testing revealed that the CFS was not fully updated to accept the required changes for task orders. In addition, similar updates would also be required for any downstream interfaces, feeder systems, and data warehouses in the bureaus. The scope of the effort to make the necessary changes to the CFS and related systems is so significant that it is not feasible to make the October 1, 2017 implementation date without severe risks and impacts.

**Purpose**

The purpose of this memorandum is to issue a Class Deviation in accordance with FAR 1.404 so that the Department may continue to utilize the existing PIID structure beyond the October 1, 2017 transition date.

**Action Required**

Contracting Officers shall use the attached deviation from the FAR.

**Effective Date**

This class deviation is effective October 1, 2017 and remains in effect until rescinded.

**Additional Information**

Questions may be directed to Iris Redmon at (202) 482-5322 or [iredmon@doc.gov](mailto:iredmon@doc.gov).

**Attachment**

Attachment

Subpart 4.16 UNIQUE PROCUREMENT INSTRUMENT IDENTIFIERS (DEVIATION 2017-02)

4.1600 Scope of subpart.

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4.1601 Policy.

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(b) Transition of PIID numbering. ~~No later than October 1, 2017, agencies shall comply with paragraph (a) of this section and use the requirements in 4.1602 and 4.1603 for all new solicitations and contract awards.~~ Until an agency's transition is complete, it shall maintain its 2013 PIID format that is on record with the General Services Administration's Integrated Award Environment Program Office (which maintains a registry of the agency unique identifier scheme.) The 2013 PIID format consisted of alpha characters in the first positions to indicate the agency, followed by alpha-numeric characters; the 2017 format instead has the AAC in the beginning 6 positions.

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