



GSA Federal Acquisition Service

August 11, 2011

## FAS INSTRUCTIONAL LETTER 2011-19

FROM:

HOUSTON W. TAYLOR  
ASSISTANT COMMISSIONER  
OFFICE OF ACQUISITION MANAGEMENT (QV)



SUBJECT:

Defining an Official Contract File for FAS  
Acquisition Programs When Operating in a Paper  
and Electronic Environment

1. **Purpose:** This Instructional Letter (IL) provides guidance on the definition of the official contract file of record for FAS contracts.
2. **Background:** One of FAS's strategic themes, Acquisition Excellence, is defined as exemplifying expertise in acquisition supported by skilled acquisition and technical expertise, high-quality acquisitions, and innovative systems and tools. One of FAS's goals in achieving acquisition excellence is to achieve end-to-end electronic contracting to better support the needs of the acquisition workforce, industry partners, and customers.

FAS has made great strides implementing a number of new initiatives towards accomplishing this goal; however, as FAS transitions to a complete electronic environment, many acquisition programs continue to administer, and in some cases award, paper contract files. For those programs operating in a transitional state, where parts of a contract file are both electronic and paper (herein referred to as "hybrid"), there is often confusion and inconsistency surrounding the definition of the official contract file. This leads to unnecessary practices like printing out electronic documents that exist in a system of record to add to a paper file. The oversight community compounds the problem by insisting on seeing a single version of the contract file in one medium when conducting contract reviews or audits.

**The intent of this IL is to clarify that hybrid contract files are official contract files of record. The IL's scope does not extend to the digitization of paper contract files or the Electronic Contract File (ECF). Guidance on these topics will be addressed through subsequent ILs.**

3. **Effective Date:** Date of signature.
4. **Termination Date:** This IL remains in effect unless it is cancelled.

5. Applicability. This IL applies to all types of acquisitions awarded and administered by GSA/FAS acquisition activities. The IL also applies to Department of Veterans Affairs (VA) acquisition activities awarding and administering Federal Supply Schedule contracts.
6. Reference Regulations. Federal Acquisition Regulation (FAR) Part 4.
7. Instructions/Procedures. Official contract files may be electronic or paper. Operating in entirely electronic environment is preferred if it is feasible from a technical and business perspective. However, when it is not possible, an official contract file may consist of both paper and electronic documents. FAR Subpart 4.802(f) states that "agencies may retain contract files in any medium (paper, electronic, microfilm, etc.) **or any combination of media**, as long as the requirement of this subpart are satisfied." Accordingly, the following business rules apply:
  - When possible, all contract actions must be submitted, worked, and/or awarded electronically through an internal application or otherwise.
  - Do not print documents that exist electronically in order to make a paper contract file "complete."
  - When there are duplicate documents that exist in paper and electronically, the electronic version supersedes the paper document and is considered to be the document of record in the official contract file.

Author: Sheri Meadema