

# Government Property Changes & Expectations

## *What's New in Government Furnished Property?*



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- 25+ years of experience in federal property management with FEMA, the Department of the Interior, and NASA's Marshall Space Flight Center.
- Over a decade as Industrial Property Officer at NASA, leading accountability and compliance efforts.
- Oversees property programs at DISA, ensuring compliance with FAR and DFARS, including GFP Module updates in PIEE.
- Consulting Fellow of NPMA and frequent speaker at local and national NPMA events.



# Learning Objectives

- ✓ Introduction
- ✓ Acronyms/Definitions
- ✓ Unchanged Requirements
- ✓ Clause Consolidation
- ✓ Stepping through DFARS 252.245-7005
- ✓ Reporting in PIEE GFP Module
- ✓ Other FAR/DFARS Regulatory Changes

# Acronyms & System Definitions

- **Government Furnished Property (GFP):** property in the possession of, or directly acquired by, the Government and subsequently furnished to the Contractor for performance of a contract. Government-furnished property includes, but is not limited to, spares and property furnished for repair, maintenance, overhaul, or modification. Also includes cap when a deliverable under a cost contract when accepted by the Government for continued sue under the contract. (Governed by FAR 52.245-1, 52.245-9 & DFARS 252.245-7003 & 7005)
- **Contractor Acquired Property (cap):** means property acquired, fabricated, or otherwise provided by the Contractor for performing a contract, and to which the Government has title.
- **Incidental Property: (FAR Part 45/FAR 52.245-1 does not apply):** 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.

# Acronyms & System Definitions

- **Serialized/Non-serialized:** Items which are tracked at an individual level, as determined by the owning agency. (all capitalized items)
- **DOD Procurement Integrated Enterprise Environment (PIEE):** suite of applications used to manage contract transactions/invoicing, oversight and authorizations:
  - **GFP Module:** application within PIEE for GFP Attachment (authorization), Shipments/Receipts of GFP, Loss reporting, and plant clearance (formerly processed through PCARSS)
  - **Wide Area Workflow (WAWF):** DD250 deliveries, processes updates to the Registry (registry updates will be processed by GFP Module in near future)
  - **Enhanced Data Repository (EDA):** Contract files and modifications, GFP Attachments from the module attach in EDA to the contract

# What Hasn't Changed?



Must have a system to manage property IAW FAR 52.245-1, and DFARS 252.245-7003



Must follow your system or procedures and have internal controls in place to safeguard and update property records



Must perform ***independent*** self assessments



Government must perform oversight/property administration of contracts with Government Property



DOD contractors must use the GFP Module



NASA contractors must report via the NF-1018 NASA Electronic Submission (NES) system

# Clause Consolidation

The final rule for DFARS Government Property clause consolidation was effective January 22, 2024.

Four DFARS clauses were consolidated into a single clause:

- **252.211-7007**, Reporting of Government-Furnished Property;
- **252.245-7001**, Tagging, Labeling, and Marking of Government-Furnished Property;
- **252.245-7002**, Reporting Loss of Government Property, and
- **252.245-7004**, Reporting, Reutilization and Disposal.

Are replaced with

- **252.245-7005**, Management and Reporting of Government Property

# Use of the GFP Module Per DFARS 252.245- 7005



DFARS 252.245-7005 requires contractors to use the Government Furnished Property (GFP) module of the Procurement Integrated Enterprise Environment to report the following:



Receipt of GFP.



Transfer of GFP from one contract to another DoD contract.



Shipments of GFP to the Government or to a contractor.



Loss of Government property.



Government property excess to contract performance for the purpose of disposal.



Request to buy Contractor-acquired property (CAP) or convert it to GFP.



# GFP Module Reporting

*\*Del & Acceptance of repairs are reported through PIEE WAWF Repairable Receiving Report per DFARS Appendix. F, which integrates with the GFP Module*

## All Property (GFP and CAP)

- Report Property Loss
- Submit Plant Clearance Schedules

## All GFP

- Report Receipt
- Report Shipment\*
- Report Transfer

## Serially-Managed GFP

- Report incorporation into a higher-level component, assembly, or end item

## CAP

- Request Conversion to GFP
- Request Authorization to Buy Back

# GFP Module Roles Required for Transactions

Required Reporting	GFP Module Capability Area	Contractor Role
Receipt	Property Transfer	Contractor Property Receiver
Transfer to another contract	Property Transfer	Contractor Property Shipper
Shipment to DoD or another contractor	Property Transfer	Contractor Property Shipper
Incorporation of Serially Managed items into higher assembly	Item Management	Contractor Item Manager
Property Loss	Property Loss	Contractor Property Manager
Plant Clearance	Plant Clearance	Contractor Property Manager
Request to buy back or convert CAP to GFP	CAP Pre-screening	Contractor Property Manager

# Reporting Timeframes



Loss – per FAR 52.245-1 – generally speaking report to Property Administrator (PA) as soon as known, enter in system post investigation



Plant Clearance – Per FAR 52.245-1, generally when no longer needed, not more than 30 days post period of performance or final delivery



Receipt, Transfer, Shipment - 7 business days of the date the change in status occurs, **unless otherwise specified in the contract**

# Reporting Contractor Acquired Property (CAP)\*

- Delivery of CAP requires a non-separately priced CLIN IAW DFARS
  - After delivery (DD250) if the CAP remains at the contractor facility for use on the contract it needs to be processed as GFP (included in the 52.245-1 definition). The GFP Module CAP report at the end of the contract after modification is required if not physically shipping the property to the Government.
  - Contractor must report to be relieved of accountability under the old contract (also removes from GFP Position Report), it is then to be processed by the Government as GFP to the new contract.
  - If the agency is utilizing the interface to their Accountable Property System of Record (APSR) you will also have to return "ship" the records for them to unlock the Government record.
- \* [GAO Report, GA0-25-106868 – July 28, 2025](#) tested DOD accountability of CAP and found "DOD Doesn't effectively monitor whether contractors are property tracking and reporting this property", **expect more scrutiny.**

# Contractor Marking IUID & Updates to the Registry for Consumed Serialized Items

## What Changed?

- Contractors were required to mark items not marked and update registry for transactions, but not the new items from repairables (new)
- No requirement to process serialized components of higher assembly item level into the higher assembly (new)

## Why?

- Because the contractor is making the change and best source for the information. The GFP Module entries will be used to update the registry versus the contractor reporting directly to the registry (which was a prior requirement)

# Marking of Repairable Items

(d) Marking, reporting, and UII registration of GFP requirements. The Contractor— (1) Shall assign the UII and mark the repairable items identified as serially managed in the GFP attachment to this contract with an item unique identification (IUID) data matrix, **when the technical drawing for the item is accessible to the Contractor and includes IUID data matrix location and marking method.**

**What is the conditional portion here (“when & and”) telling us?**

Common sense if this is an engineered item, and marking wasn’t part of the design it may not require current contract marking, have the agency update the exemption in the contract, add to your property plan, and document it cannot be done. If current contract service removes the marking, the UII and marking method should have been provided – if not request it. Lastly, if the current contract is changing the serial number and UII then registry entries are needed and the retired item also requires update (by the agency or GFP Module transaction). When it is not clear – ask/clarify.

# WAWF DD250 for Delivered Repairable Items

- Not applicable to general commercial off the shelf items or warranty repairs – (warranties for serialized asset clauses, and data deliverables not listed in FAR 12.301 – “*to the maximum extent practicable only use those clauses listed...*” except where the Government has paid for a portion of the design IAW DFARS 227.7103-6)
- Must have deliverable CLIN for WAWF transaction(s)
- Intended for major overhaul and repair contracts
- Quality clauses for data packages, warranties and CLIN deliveries would go hand in hand with this requirement (see DFARS 252.246-7005-7006)

Receipt & Shipment  
Templates also combine  
Serialized/non-serialized  
items with drop down in  
“Serially Managed”  
column

[illegible]



# Revolutionary FAR Overhaul

## EO 14275 & OMB Memorandum M- 25-26



### Expect Changes!

- Agencies can adopt new guidance as deviation to FAR or Supplements\*
- Less not more, premise requirement must exist in law or regulation to be included in Supplements
- No change so far to FAR 45, 52.245, or related DFARS, NFS
- NFS put their clauses to this test 6-7 yrs ago, completely overhauled Uniform Guidance and their Grants Handbook – some good, some bad omissions
- More information:  
[Acquisition.gov Page](#)  
[Open for informal comments](#)

*\* Could be confusing as agencies don't adopt all immediately or update existing contracts*

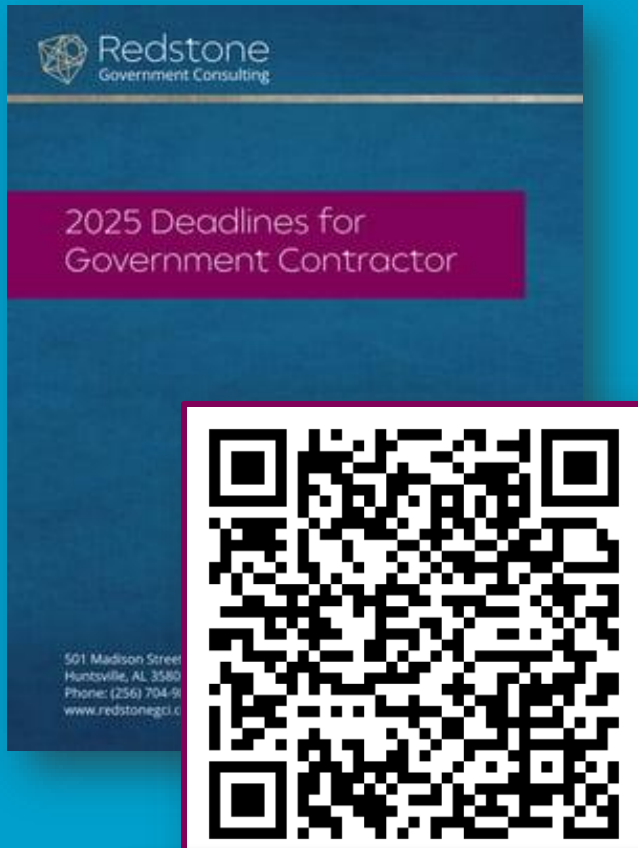
# Questions and Discussion



# 2025 Critical Deadlines for Government Contractors

This guide provides you with all of the essential information and dates you need to know, including:

- Important deadlines for your internal departments
  - Accounting,
  - Human Resources,
  - Contracts & Subcontracts, and
  - Government Compliance
- Contract performance and delivery deadlines
- Deadlines for reporting and compliance requirements
- Deadlines for audits and reviews





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