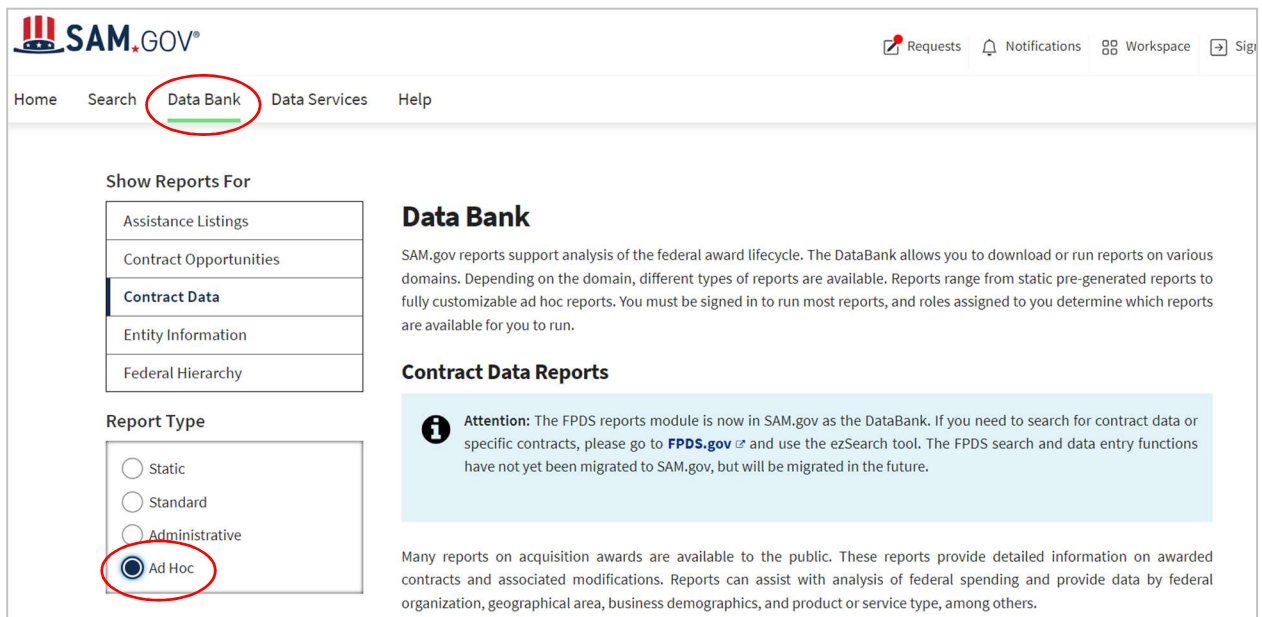


Non-traditional Defense Contractor (NDC) Status Validation Guide

In September 2022, the DoD Inspector General (IG) completed an audit on Other Transactions (OT) for prototypes awarded by the DoD. In its findings, the DoD IG found that agreement officers (AO) did not always verify the status of NDCs prior to awarding an OT for prototypes. The DoD IG recommended that the DoD require AOs validate the NDC status prior to award and include documentation of the verification in the OT file. In response to the DoD IG findings, OUSD (A&S) released version 2.0 of the DoD OT Guide in July 2023, which stated that “AOs should validate and document a NDC’s status prior to OT award to ensure the conditions of 10 USC 3014 are met; an AO may run a Federal Procurement Data System (FPDS) report against the cost accounting standards (CAS) clause code...to validate it has had no CAS covered contracts within 12 months preceding the release of the solicitation”.

The following steps outline how to build a FPDS report in SAM.GOV to verify if a contractor has performed on any CAS covered contracts within 12 months prior to the release of a solicitation date. This report only needs to be created once and can be quickly updated for each new NDC verification check. An explanation on why each data field was selected for this report is listed in the summary section at the end of this guide.

1. Log into <https://sam.gov/>
2. In the ribbon, select “Data Bank” and under Report Type, select “Ad Hoc”.



The screenshot displays the SAM.GOV website interface. At the top, the SAM.GOV logo is on the left, and navigation links for Requests, Notifications, Workspace, and Sign Out are on the right. Below the logo, a navigation bar includes Home, Search, Data Bank (highlighted with a red circle), Data Services, and Help. The main content area is divided into two columns. The left column has a 'Show Reports For' section with a list of report categories: Assistance Listings, Contract Opportunities, Contract Data (highlighted with a blue bar), Entity Information, and Federal Hierarchy. Below this is a 'Report Type' section with radio buttons for Static, Standard, Administrative, and Ad Hoc (highlighted with a red circle). The right column features a 'Data Bank' heading, a descriptive paragraph about SAM.gov reports, and a 'Contract Data Reports' section. A light blue callout box contains an 'Attention' icon and text stating that FPDS reports are now in SAM.gov as the DataBank and that users should go to FPDS.gov for search tools. At the bottom, a paragraph explains that many reports on acquisition awards are available to the public.

3. Scroll to the bottom of the screen and click “Award/IDV Information Report”.

How does the Unique Entity ID appear in contract data ad hoc reports?

DUNS fields have been renamed, and Unique Entity ID fields have been introduced.

[What are the columns BLANK 1 \(DEPRECATED\) and BLANK 2 \(DEPRECATED\) in contract data ad hoc reports?](#)

Showing 1-2 of 2 reports

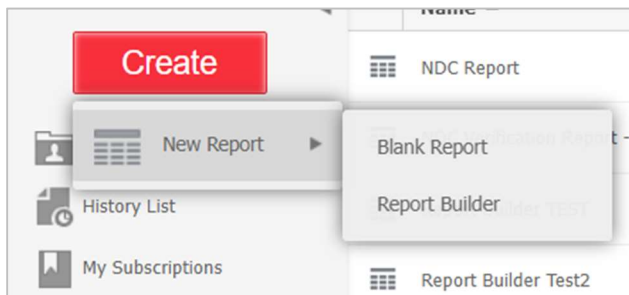
Award/IDV Information Report [↗](#)

Construct a report of contract award data.

Other Transaction Information Report [↗](#)

Construct a report of other transaction data.

4. In the top left corner, click the red “Create” button, then select “New Report” > “Report Builder”.



5. In the start date field (#1 and #2), enter the date 12 months prior to the release date of the Area of Interest (AoI). In the end date field, enter the date the AoI was released. For example, if the AoI was released 30 October 2023, the start date would be 31 October 2022 and the end date would be 31 October 2023.

1. Start Date for Date Signed

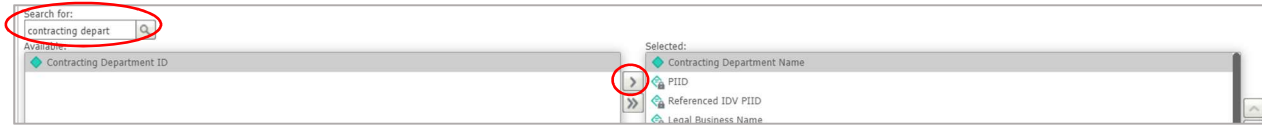
Please Enter a Start Date for Date Signed

2. End Date for Date Signed

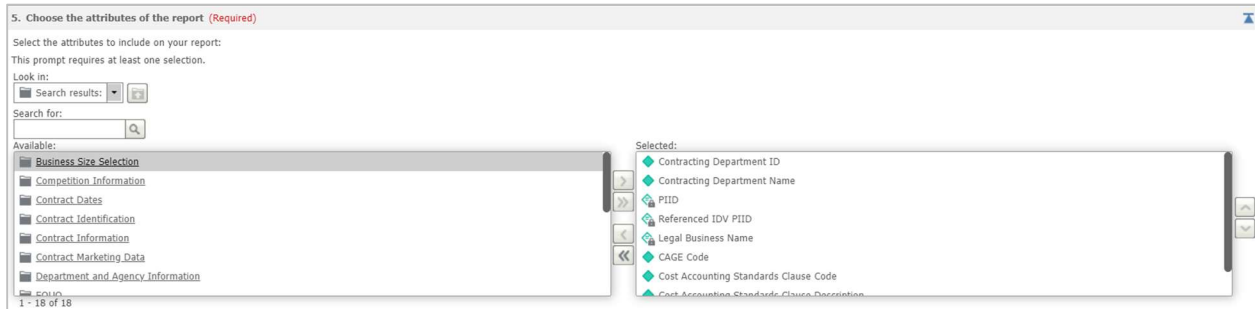
Please Enter an End Date for Date Signed

6. Do not enter dates under items #3 and #4 (start and end date of modifications).

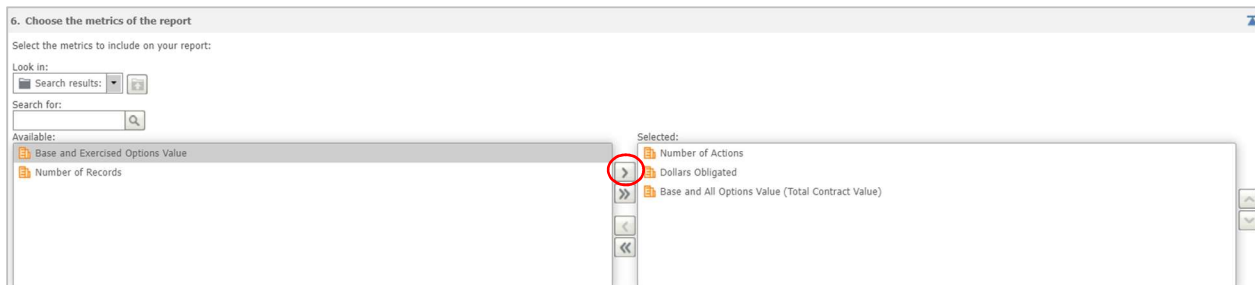
7. Under the report attributes (#5), select attributes by searching for the same in the “Search for” box and clicking the “>” arrow to bring the attribute from the “Available” box to the “Selected” box.



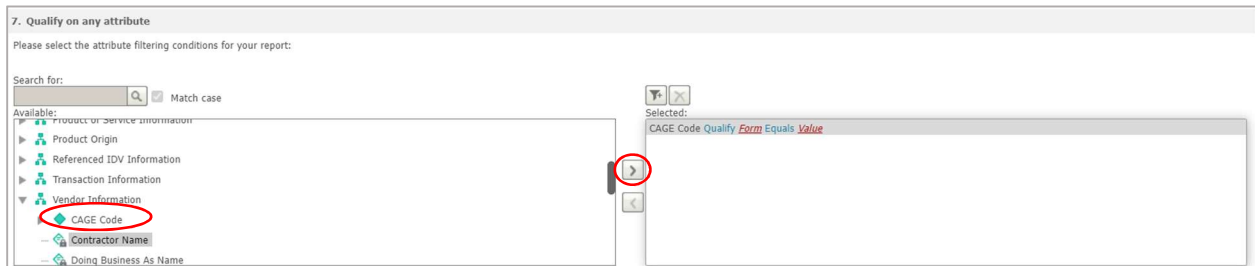
8. Select the following attributes: **Contracting Department ID; Contracting Department Name; PIID; Referenced IDV PIID; Legal Business Name; CAGE Code; Cost Accounting Standards Clause Code; Cost Accounting Standards Clause Description; Award or IDV Type.**



9. Under report metrics (#6), move the following from the “Available” box to the “Selected” box by clicking the “>” arrow: Number of Actions; Dollars Obligated; Base and All Options Value (Total Contract Value).



10. Under attribute qualifications (#7), scroll in the Available box to “Vendor Information”. Select “CAGE Code” and click the “>” arrow to bring the qualifier into the selected box.



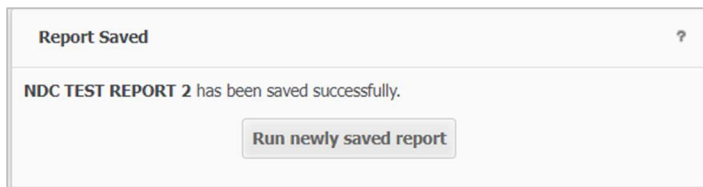
11. In the “Selected” box, click **Form** and select “ID”. Click **Value** and enter the contractor’s CAGE code, as shown below.



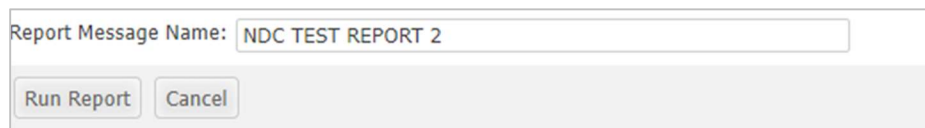
12. At the bottom left corner of the screen, name the report (default name is “Report Builder”) and click “Save”.



13. In the next screen prompt, select the “Run newly saved report” button.



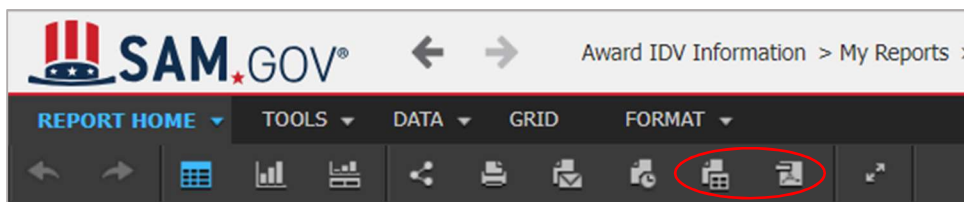
14. You will be returned to the report builder with your newly saved report. At the bottom left corner of the screen, select “Run Report”.



15. Your report should look similar to the following example:

Contracting Department ID	Contracting Department Name	PIID	Referenced IDV PIID	Legal Business Name	CAGE Code	Cost Accounting Standards Clause Code	Cost Accounting Standards Clause Description	Award or IDV Type	Number of Actions	Dollars Obligated	Base and All Options Value (Total Contract Value)
6900	TRANSPORTATION DEPARTMENT OF	697DCK21C00347		IDIRECT GOVERNMENT, LLC	503H8	X	NOT APPLICABLE EXEMPT FROM CAS	DEFINITIVE CONTRACT	2	\$88,699.45	\$0.00
9700	DEPT OF DEFENSE	FA860423PB004		IDIRECT GOVERNMENT, LLC	503H8			PURCHASE ORDER	1	\$381,260.50	\$381,260.50

16. The report can be exported to Excel or PDF file formats to file into the OT file by clicking on the associated export icon in the toolbar.



17. When you are ready to run a new report, you can follow steps 1-3 to return to your saved reports. Click on the report name to open the report builder, enter the dates specific to your verification check (end date = date AoI was released, start date = 12 months prior to AoI release date), and update the vendor's CAGE code as show in step 11 above. Select "Run Report" to generate the new report.



Summary

10 USC 3014 defines an NDC as an entity that is not currently performing and has not performed, for at least the on-year period preceding the solicitation of sources by the DoD for the procurement or transaction, any contract for the DoD subject to full coverage under CAS. This report helps the AO verify that the contractor meets this definition with the following data fields.

Contracting Department ID and Contracting Department Name: Since the definition of an NDC under 10 USC 3014 is specific to contracts for the DoD, this field identifies if the contract action was awarded by the DoD or a non-DoD federal agency. Contracts subject to CAS that were awarded by a non-DoD agency does not preclude the entity from meeting the definition of an NDC.

PIID and Referenced IDV PIID: PIID identifies the contract or order number and the referenced IDV identifies the contract vehicle (indefinite quantity, GSA schedule, etc.) if the PIID is a task or delivery order.

Legal Business Name and CAGE Code: The contractor's name and CAGE code.

Cost Accounting Standards Clause Code and Cost Accounting Standards Clause Description: This gives the value selected in the contract action report (CAR) on whether or not a CAS clause was included in the contract. If a DoD contract has "Y" selected and the total contract value is under \$1 million, it is recommended that the AO verify if the contract was truly subject to CAS. The DoD contract can be viewed in EDA by searching the PIID. There have been reported instances where the contracting officer completed the CAR incorrectly and selected "Y" for the CAS clause code on a firm fixed price commercial contract.

Award or IDV Type: This field lists whether the contract action was a definitive contract or an indefinite quantity type contract. If the contract type is indefinite quantity and the CAS clause code is "Y", but there have been no task orders or delivery orders in the previous 12 months placed against the indefinite quantity contract, then the contractor has truly performed under the contract. This is important to verify because there are several contractors that have indefinite quantity contracts for information technology related services with DoD agencies, valued over \$1 million, subject to CAS, but no orders placed during the ordering period.