



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

OCT 22 2010

**PROCUREMENT MEMORANDUM 2011-03**

**ACTION**

**MEMORANDUM FOR:** BUREAU PROCUREMENT OFFICIALS  
HEADS OF CONTRACTING OFFICES

**FROM:** Helen Hurcombe *Helen Hurcombe*  
Senior Procurement Executive  
and Director for Acquisition Management

**SUBJECT:** Justification and Approval for Non-Use of Federal Strategic  
Sourcing Initiative Blanket Purchase Agreements for Office  
Supplies

**Background**

The General Services Administration, along with various other federal agencies including the Department of Commerce, are focused on optimizing federal buying power through strategic sourcing and collaborative efforts. Toward that end, GSA has awarded fifteen (15) Federal Strategic Sourcing Initiative (FSSI) Blanket Purchase Agreements (BPA) for office supplies. Each BPA has a one-year term with three one-year option periods and have been negotiated to reflect reduced pricing compared to conventional GSA supply schedules and to capitalize on high-volume discounts which will be realized through multi-agency use of these BPAs. The Department of Commerce (DOC) is committed to maximizing its use of these BPAs and, through memorandum from the Chief Financial Officer/Assistant Secretary for Administration dated October 18, 2010, (Attachment 1) has mandated the use of these BPAs for acquisition of office supplies within DOC with limited exception. The mandatory use of FSSI BPAs is of paramount importance within DOC.

**Purpose**

The purpose of this memorandum is to prescribe the requirements for justification and approval of any exception to the use of FSSI BPAs for acquisition of office supplies through any method or contractual vehicle, including purchase cards.

**Applicability**

The requirements of this policy are applicable to all acquisitions for office supplies including purchase card transactions.

**Required Actions**

Prior to entering into any acquisition of office supplies not obtained through the FSSI BPAs, except for transactions at *PaperClips* stores, the contracting officer or purchase cardholder shall

complete a *Justification and Approval for Non-Use of FSSI BPA for Office Supplies* form (Attachment 2). The content and approval process for the form is as follows:

1. Document the Justification for Non-Use of FSSI BPAs  
The basis for determining that the non-use of FSSI BPAs shall be specifically documented. For example, if the basis for non-use is price advantage of an alternative vendor, the prices compared for the determination must be included in the documentation. If the basis for exception is time constraint which prohibits the use of the one-day delivery available from FSSI vendor(s), the time constraint must be specifically described including the impact to the mission of the organization. If another basis for non-use is determined, the basis for that determination shall be specifically documented.
2. Obtain Approval for Justification for Non-Use of FSSI BPAs  
The justification including supporting documentation shall be approved by the Bureau Procurement Official (BPO) for acquisitions including those utilizing the purchase card. This authority may be delegated no lower than Head of Contracting Office at the discretion of the BPO.
3. Retention of Justification and Approval in Contract or Purchase Card File  
The contracting officer or purchase cardholder shall retain the approved form in the contract or purchase card file.

#### **Oversight and Data Management**

Non-use of the FSSI BPAs for office supplies will be reviewed through the acquisition management review process. In addition, based on current and contemplated strategic sourcing initiatives, data calls regarding the number and basis for justifications and approvals for non-use of FSSI BPAs may be conducted. On an ongoing basis, Bureau Procurement Officials are asked to provide information to the Senior Procurement Executive regarding observed trends for acquisitions for office supplies outside of FSSI BPA and the basis for the exceptions so that feedback can be provided to GSA regarding the effectiveness of the FSSI BPAs and opportunities for improvements.

#### **Effective Date**

The requirements herein are effective immediately through May 31, 2014, or until rescinded.

The point of contact for this matter is Lori Donovan, 202-482-1716 or [ldonovan@doc.gov](mailto:ldonovan@doc.gov).

Attachment: Justification and Approval for Non-Use of FSSI BPA for Office Supplies Form

cc: Heads of Contracting Activity  
Chief Financial Officers  
Bureau Procurement Officials  
DOC Purchase Cardholders  
Acquisition Community  
Acquisition Council