# smith anderson Client Alert

### **Expect Excellence**

**July 2012** 

## System for Award Management (SAM) Implementation Set for July

Many government contractors are familiar with the alphabet soup of federal procurement systems, including the Central Contractor Registration (CCR), Online Representations and Certifications Application (ORCA), and the Excluded Parties List System (EPLS). Many federal contractors must register with, update and periodically monitor these systems for important information. Eventually, these systems will only be accessible through a single portal called the System for Award Management (SAM). The transition will occur through several phased consolidations. Phase I was originally planned to consolidate CCR, ORCA and EPLS by May 29, 2012. The Phase I implementation date has been delayed to the end of July 2012.

Why consolidate? The federal government has directed the General Services Administration (GSA) to combine several federal procurement systems and the Catalog of Federal Domestic Assistance (CFDA) into a single new system. The intent is to create efficiencies and reduce the burden on those seeking to do business with the federal Government. The result is that vendors can log into one system with a single password to manage their entity information and procurement information.

Other less common systems to be included in SAM include the Federal Business Opportunities (FBO), Catalog of Federal Domestic Assistance (CFDA), Electronic Subcontracting Reporting System (eSRS), Federal Funding Accountability and Transparency Act (FFATA) Sub-award Reporting System (FSRS), Wage Determinations Online (WDOL), Federal Procurement Data System – Next Generation (FPDS-NG), and Past Performance and Information Retrieval system (PPIRS). Currently each system requires a separate login, separate process and separate location of data. Ultimately, all of these systems should be consolidated into SAM.

What should federal contractors do in the interim?

- Review the SAM information at <a href="http://sam.gov">http://sam.gov</a>.
- Recognize that transitioning to any new system will create problems until bugs are resolved.
- Continue to register and update contractor data on the CCR and ORCA, and monitor the other systems until SAM is implemented.
- Pay particular attention to your North American Industrial Classification System (NAICS) codes when you self-certify.
- Once Phase I is implemented and SAM "goes live", register for a SAM account at <a href="http://sam.gov">http://sam.gov</a>. A contractor already registered in CCR or ORCA need not act until it is time to update registration. Records submitted through CCR or ORCA should be waiting in SAM. Data that was public in the legacy systems will remain public in SAM.

### **Author**

David L. Hayden 919.821.6755 dhayden@smithlaw.com

Government Contracting

#### **Team**

J. Mitchell Armbruster 919.821.6707

David B. Clement 919.821.6754

H. Martin Lancaster 919.821.6747

Wayne K. Maiorano 919.821.6684

Peter J. Marino 919.821.6607

Jackson W. Moore 919.821.6688

Jeffrey J. Truitt 919.821.6763

Kirk G. Warner 919.821.6617

Smith Anderson 150 Fayetteville Street, Suite 2300 Raleigh, NC 27601 919.821.1220 www.smithlaw.com