

	A	G	H	I	J
2	Comment #	Comment	Organization (Agency or Company)	Response	Update Paper Form Y or N
3	25	Please spell out all acronyms.	NASA	Ok	Y
4	26	Consider providing a block to specify the following requirement of TFM Bulletin 2007-03: 3. g. The method and frequency of performance (revenue and expenses) reporting.	NASA	TT-Per the TT 5.3.10 meeting- email for clarity 5.18.10 Recommend updating instructions - yes	Y
5	29	Seller's Authority. The third choice should be "Other" or Other Authority, not "Other Fund." A number of agencies have other transaction authority (e.g., the Space Act or Brooks Act). These provide the legal basis for entering into the business arrangement. They do not create another fund. (The change to "Other Fund" was made after we last saw the document.	NASA	TT-Agree per the TT 5.3.10 mtg	Y
6	30	24(b) Advance Information. This block is made available to indicate whether buyers and sellers would recognize an advance on cash basis. We believe that advances should be recognized on an accrual basis in the normal course of business and that to record advances otherwise would be inconsistent with accounting standards and the Standard General Ledger (SGL). Providing an option to allow for a cash basis advance would be inconsistent with accounting practices and SGL entries. If the intent is to provide for cash basis advances in order to accommodate some agencies, it is suggested that an explanation or justification be provided in those cases. Also, it is suggested that criteria for cash basis as opposed to accrual basis advances should be clarified. 24(c) It is unclear why an explanation should be expected in the case of an accrual basis advance.	NASA	24b Correct - 24c an explanation is required to ensure proper communication and accounting between trading partners. There is one of the main reasons the Gov can't reconcile reimbursable activity To support SFFAS 7	Y
7	33	HUD 2. On Page 4, under the heading "General Instructions," we suggest adding the following language before the period at the end of the first sentence in the second paragraph: "and no services may be performed and no goods may be delivered" . Although our proposed language is implied by the current first sentence, we believe it is very important to be absolutely clear that no services may be provided and no goods may be delivered simply through the execution of this GT&C section. We have specific experience with people viewing agreements that are not fiscal obligations as fiscal obligations and believing that services can and should begin. Substantive Comments	HUD	TT-Agree per the TT 5.3.10 mtg	Y
8	35	HUD 4. On Page 6, Line No. 9, under the "Economy Act" Field Name, after the second sentence in the instructions (prior to the parenthetical citation), add the following sentence: "It is important to note that section 1535(d) states, in part, that '[t]he amount obligated is debilitated to the extent that the agency or unit filling the order has not incurred obligations before the end of the period of availability of the appropriation, in (1) providing goods or services; or (2) making an authorized contract with another person to provide the requested goods or services.'" When one-year funds are used for an IAA, which is very often the case, it is critical for both agencies to remember that funds must be debilitated and returned to the "buyer" agency if the "seller" agency has not met the obligation requirements under section 1535(d). We believe it is important to explicitly remind agencies of these important statutory requirements in these proposed standard IAA documents.	HUD	TT-Per the TT 5.3.10 meeting - will add	Y
9	36	HUD 5. On Page 8, Line No. 20 (continued), under the "Approval Date" Field Name, in the second sentence in the instructions, add the underlined clause after "created" to read as follows: "However, a fiscal obligation is not created, and no services may be performed and no goods may be delivered, until the parties execute an Order, which requires the Buyer to describe a bona fide need and to provide funding information that must then be accepted by the Seller." Although our proposed language is implied by the current second sentence, we believe it is very important to be absolutely clear that no services may be provided and no goods may be delivered simply through the execution of this GT&C section. We have specific experience with people viewing agreements that are not fiscal obligations as fiscal obligations and believing that services can and should begin.	HUD	TT-Per the TT 5.3.10 meeting - will add /check with legal on adding this statement from However ...Order 5.18.10 - Legal said okay - will update per comment	Y
10	37	HUD 6. On Page 8, Line No. 28, in the instructions for the "ORDER LINE/FUNDING [*Contract] INFORMATION" Field Name, replace the word "should" with the word "shall" to read: "All funding information shall comply with all applicable appropriation law provisions." The use of the word "should" could be interpreted by some to provide some discretion. We need to be clear that following appropriation law provisions is a legal requirement. <u>Order Requirements and Funding Information Section</u>	HUD	TT-Per the TT 5.3.10 Meeting - will change to "must"	Y
11	38	HUD 7. On Page 10, Line No. 29, in the instructions for the <i>Funding Clauses</i> Field Name, add the following clarifying sentence at the end: "If a 'subject to the availability of funds' clause is used, it is important to note that no services may be performed until the buyer gives written notice to the seller that funds are available and the seller can proceed." Funding clauses, including "subject to the availability of funds" should be used sparingly and cautiously. For example, only severable services can be incrementally funded. We have encountered much confusion over the years about when services can begin or continue under such clauses, so we believe it is important to remind agency staff that no services may be performed until the buyer gives written notice to the seller that funds are available and the seller can proceed.	HUD		Y
12	41	HUD 10. On both forms, replace the URL for http://www.fsio.gov with a more current address. Suggestions	HUD	Agree	Y
13	42	HUD 11. On Page 9 of the Order form, in the instructions for Line 28, for the Field Name "BPN + 4," troubleshoot the URL. The existing URL produces an error. Suggestions	HUD	OK	Y
14	43	HUD 12. On Page 6 of the GTC form, in the instructions for Line 13, troubleshoot the URL at the end of the first paragraph (it appears to have an extra space added).	HUD	OK	Y

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15	44	HUD 13. On Page 5 of the GTC form, in the instructions for the IAA Number, in the box for the Amendment Number, correct the grammatical typo for the first article so that the sentence reads: "Numeric – If this is an amendment, a unique Amendment Number for the GT&C must be entered."	HUD	OK	Y
16	45	HUD 14. Consider adding to the instructions on both forms an explanation conceding that the use of the words "Buyer" and "Seller" are not intended to imply that the interaction between agencies reflects the characteristics of private sector transactions, but is used for ease of reference.	HUD	TT-Per TT 5.3.10 Meeting Change Buyer-Requesting Agency and Seller to Servicing Agency and all references throughout document	Y
17	46	HUD 15. Consider marking the asterisk lines in both forms more clearly to reflect that they are required for Assisted Acquisitions.	HUD	OK	Y
18	47	HUD 16. On Page 1, Line No. 23, consider adding the following clarifying sentence prior to the sentence in the bottom of the block: "For modification orders, insert the performance period that reflects the modification."	HUD	Per TT 5.3.10 Meeting will not make comment change, will remove not applicable to Assis Acq, will update instructions to clarify how to amend boxes upon annual review or when things change	Y
19	48	HUD 17. On Page 2, Line No. 28, under "Buyer Funding Information," consider including the DUNS number beneath the "Trading Partner Code."	HUD	Per TT 5.3.10 Mtg change to BPN/Dunns and BPN/DUNS +4	Y
20	50	HUD 19. On Page 4 or 5, either as Line No. 34 or Line No. 35, consider adding a POC block for Contracting POCs. A corresponding instruction would also be needed on Page 12.	HUD	Per TT 5.3.10 mtg update instructions for COTR/COR and additional POC optional boxes. This could be Program and Acquisition contacts or other poc, signatures are optional depending on an agencies need.	Y
21	51	HUD 20. On Page 7, Line No. 23, in the instruction for the "Performance Period" Field Name, at the end of the paragraph, consider inserting the sentence: "For modification orders, insert the performance period that reflects the modification." SUPPORTS CHANGE ON FORM-PG 1	HUD	See #47 - per TT 5.3.10 mtg only update the instructions	Y
22	52	HUD 21. On Page 9, Line No. 28, consider adding the Field Name "DUNS Number" after the line for "Trading Partner Code." SUPPORTS CHANGE ON FORM-PG 2	HUD	per TT 5.3.10 mtg only update per #48	Y
23	54	HUD 23. On Page 6, consider deleting the first sentence of the first paragraph and changing the first word of the next sentence to "This form." This first sentence may be better highlighted in a transmittal memo rather than in the form instructions, which may presumably continue in their current format for several years.	HUD	Per TT 5.3.10 -will change per comment	Y
24	58	NEA 3. Block 24. "Advance Information" – Block 24a works for any advance dollar amount of the order. However, shouldn't block 24b be addressing the "Revenue Accounting Methodology", and not the "Advance Accounting Methodology" data? The accounting questions for advance versus reimbursement, SFFAS 4 & 30 information, transaction types/codes should follow.	NEA	Per TT 5.3.10 mtg - will change title per comment - this box changes per SSFAS 7 also	Y
25	63	NSF 1. Per the instructions, Block 21 is for the organization name and address, which for many would be a subagency under the trading partner. This is the entity organization and not a specific person, so it does not make sense to include "email address". The people contacts are under the Contact Information section. We would also suggest clarifying the instructions that "name" means organization name and not a person; therefore, inclusion of general contact numbers will not be necessary and to be deleted. The instructions should also include an added note to direct the form user to put person specific info under Contacts (blocks 32-35).	NSF	Per TT 5.3.10 mtg - will change per comment	Y
26	65	NSF 2. Block 22 of the Order for Modifications does not make sense and is not easy to use – especially if you want to add a line and additional funding. NSF has mocked up an example of a revised block 22 to track funding changes. Also included a question about whether the mod involves adding a line, which could be a common reason for a modification.	NSF	AI - Per TT 5.3.10 Mtg. - team will review NSF box 22 mock up and give comments or additional mock up by May 14th 5.18.10 - comments received will be incorporated into June 3rd draft	Y
27	66	NSF 3. The biggest issue with the Order form is defining what blocks relate only to the individual line and putting all of the line info on one stand alone page to make it easier to insert extra line pages as needed NSF is assuming that only block 28 is definitely all Line-specific and that the following blocks 29-35 are for the Order as a whole (although in the mock-up, we have also renumbered and moved/rearranged some of the lines)	NSF	AI - Per TT 5.3.10 Mtg. - team will review NSF box 22 [BOX 25] mock up and give comments or additional mock up by May 14th 5.18.10 - comments received will be incorporated into June 3rd draft	Y
28	67	NSF 4. In order to segregate block 28, which is currently spread between page2 and 3 of the form, there is going to be a formatting challenge. One choice is move the billing and payment blocks 25-27 to fall after block 28, which would then necessitate renumbering four of the blocks (i.e., the Line info would become block 25 and the billing/payment blocks would become blocks 26-28). The other solution is to spread out the blocks to make block 28 stand alone, which will result in another page. Regardless of which solution is chosen, block 28 does need some rearrangement and added cost clarification for non-assisted acquisition orders. Specifically, the funding expiration and cancellation dates need to be grouped to the funding codes – not after the scope, where it is currently pushed to another page. These dates are critical and directly related to the Appropriations being transferred.	NSF	AI - Per TT 5.3.10 Mtg. - team will review NSF box 22 [BOX 25] mock up and give comments or additional mock up by May 14th 5.18.10 - comments received will be incorporated into June 3rd draft	Y
29	68	NSF 5. NSF also suggests removing the * in Blocks 20, 21 and 32 since it is misleading to prefix the Buyer and Seller Agencies with the * because users would automatically equate them to be fields for Assisted Acquisitions use only.	kdasuki@nsf.gov	Ok - remove "*" in referenced boxes	Y
30	69	NSF 6. The term Amendment is used in the first few pages in the GT&C section. However, when the 'order' section starts, the term Modification is used. Contracts are modified and IAAs are amended.	kdasuki@nsf.gov	Per TT 5.3.10 Mtg - no change - terms used per OFPP Assisted Acquisition document. (Same as 69, 337, 393) Will review instructions for clarity	Y

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2	Comment #	Comment	Organization (Agency or Company)	Response	Update Paper Form Y or N
31	88	Page 3: Section 20 Comments: This section should include general contact information for the buyer and seller. This information may be different from the contact information on the order form. Also, right above section 20 there is language stating that for assisted acquisitions, the parties agree to jointly review the GT&C at least annually. This should apply to all multi-year IAAs, not just assisted acquisitions.	DOC	Per TT 5.3.10 Mtg - change per comment	Y
32	89	Page 4: General Instructions The fsio.gov website reference should be updated for CFO Council website when changeover is complete. Right now, I was not able to view the referenced Standard Business Processes document following the links.	DOC	Update FSIO URL	Y
33	95	Page 1: Section 22 Comments: In this section the Modification Funding chart is confusing and appears to only work for modifications to the funding amount, not funding type or frequency, etc. This format invites the possibility of improperly incrementally funds for non-severable services; improperly treating as a new obligation an upward adjustment to an existing obligation that is necessary because of an underestimation of the cost of a service (rather than relating the obligation back to the date of the initial Order); or, increasing an existing obligation to a previously recorded transaction because new work will be undertaken that is exactly the same as prior work even though such a transaction should constitute a new obligation because it is to meet a new bona fide need (in which case, a new Order form should be used; but neither the form nor the directions make clear that a new bona fide need requires a new Order and constitutes a new obligation).	DOC	AI - per box 67 5.18.10 - comments received will be incorporated into June 3rd draft	Y
34	97	Page 2: Section 28 Comments: In this section the Description of the Product/Services has an asterisk prior to "Bona Fide Need," which incorrectly implies that a bona fide need determination is only required of assisted acquisitions.	DOC	Per TT 5.3.10 mtg - okay will change with new box 28 set	Y
35	98	It also would make better sense to have the "buyer funding expiration date" information closer to the TAS code and the "buyer funding cancellation date" seems unnecessary.	DOC	Per TT 5.3.10 Mtg - agree to change but will keep "cancellation date per NSF mock up	Y
36	99	Also, it is not clear why the Cancellation Date information is needed in the Order form; it is rare for an appropriation's cancellation date to impact performance under an interagency agreement, but it is quite common for individuals to mistakenly believe that the cancellation date of an appropriation somehow extends the obligational availability of the appropriation or that it somehow absolves them with complying with the Economy Act's deobligation requirement. At a minimum, the directions portion of the form should explain the distinction between obligational availability and availability to liquidate against properly incurred obligations until the appropriation's cancellation date. This section could simply read, "The last date the payment must be disbursed is five years from the expiration date." Making people do the math here seems very unnecessary.	DOC	Per TT 5.3.10 mtg - update instructions per bold	Y
37	100	Lastly, Severability Determination – The Bona Fide Needs Rule applies equally to basic interagency transaction and assisted acquisition interagency transactions. If severability must be checked off, it should be checked off for all agreements, not just those that relate to an assisted acquisition.	DOC	per TT 5.3.10 mtg, remove * on form and instructions and remove "for Assisted Acquisition"	Y
38	109	The sections of the new IAA form seem excessive (e.g. it request attachments for organizations authorized to request assisted acquisitions, role & responsibilities of buyer/seller, etc). Our current MOU/IAA form achieves the desired outcome without requesting the excessive information. Additionally, the template has a lot of information (e.g. fields) that is not easy to follow.	DOC	The form will be updated wherever possible to include information for all IG types, including AA	Y
39	117	GT & C: Page 6, line #7: Per the link "http://www.fsio.gov", FSIO has ceased operations and the website will remain available until May 1, 2010. The documents will be transferred to the CFO Council website www.cfoc.gov on or before May 1, 2010 so this should be reflected in this document.	DOC	Update FSIO URL	Y
40	119	Order Page 1, line #22: The "For Modifications to Funding Info.." is confusing.	DOC	AI - per box 67 5.18.10 - comments received will be incorporated into June 3rd draft	Y
41	120	Order Page 1, line #28: Add section for "Project Number".	DOC	Per TT 5.3.10 mtg - update Additional Accounting Class to include / information and update instructions to include , such as project number	Y

	A	G	H	I	J
2	Comment #	Comment	Organization (Agency or Company)	Response	Update Paper Form Y or N
42	121	Order Page 1, line #28: If there are multiple projects to one agreement, where will they be listed?	DOC	Per TT 5.3.10 mtg - to do one project per Order or one project per Order line	Y
43	122	Order Page 1, line #28: Is the "BPN+4" the same as "DUNS+4" ? If not, please add "DUNS+4".	DOC	Per TT 5.3.10 mtg - agree to change	Y
44	124	GT&C Page 5: Line No. 5 Agreement Period states that an IAA start date "must be on OR after the date the IAA is signed by both parties". How will agencies deal with emergency work when it takes months to clear agreements through OGC and get all signatures? Most DOC bureaus use the TWA (temporary work authority) functionality in CBS. Can all signatures be obtained prior to clearance through OGC? (Also referred to on page 7, Line 20)	DOC	Per TT 5.3.10 mtg - C to get statute. There is an exception for emergency work - like Katrina 5.18.10 - TH to follow up. Legal found regulation from 2006, modification to FAR - DoD, GSA and NASA - keep open 5.25.10 - still working on	?
45	141	GT&C Page 4: fsio.gov website is obsolete. Effective 4/1/2010 FSIO is closed and ceased operations on March 31. Information will be on www.cfoc.gov effective May 1, 2010.	DOC	Ok-Update FSIO URL	Y
46	142	GT&C Page 4: * Assisted Acquisitions: This is referred to as a "section" . The GT&C and Funding are labeled as sections. There does not seem to be a "section" for Assisted Acquisitions.	DOC	Ok-Change to read "these instructions"	Y
47	146	Order Page 1: Funding Information – Number 23. Why is the Period of Performance not applicable for Assisted Acquisitions? The Buyer may need the service or product within a specific period of performance. Shouldn't the agreement period of performance cover the period of performance and closeout of the contract?	DOC	Per TT 5.3.10 mtg - it is applicable - change to be made	Y
48	149	Order Page 3: Type of Contract Requirement – Incorrect. Type of Contract means whether it is a fixed price or cost-type contract, etc. Should be changed to say "Type of Service" .	DOC	Per TT 5.3.10 mtg - Please use additional accounting classification	Y
49	159	Order Page 6: General Instructions: http://www.fsio.gov This site is out of business.	DOC	Agreed - OMB is working on a joint consistent policy between OFFM and OFPP for the standard IAA form Update FSIO URL	Y
50	175	EPA 8) The block for modifying the funds, can be confusing in its current format. A better format could be used to make it more clear.	EPA	AI - per box 67 5.18.10 - comments received will be incorporated into June 3rd draft	Y
51	180	EPA 13) On the lines of accounting block(s) that are currently missing, it would be important to make it large enough for multiple lines.	EPA	per TT 5.3.10 mtg - looking at new structure for line 28	Y
52	200	Recommend adding the following: The description must be specific, definite, and clear in order to demonstrate a bona fide need. This section must also include the responsibilities and respective roles that buyer and seller must carry out to ensure the effective management and use of an interagency agreement	GSA - BCA	Expanding Roles and Responsibilities area to capture on form	Y
53	213	Recommend adding "Title" of the person who will received the shipment.	GSA - BCA	Per TT 5.3.10 mtg - agree to add	Y
54	225	Recommend adding the field and instructions/description for "Title" of the person who will received the shipment.	GSA - BCA	Per TT 5.3.10 mtg - agree to update instructions	Y
55	283	Add DUNS number for government offices. Add option for a unique Customer Agency Tracking number. For example with GSA RWAs (Reimbursable Work Authorization - Agreement between General Services Administration (GSA) and a customer, usually a Federal agency), whereby PBS (Public Buildings Service - The GSA organization that functions as the landlord for the civilian federal government by being a provider of workspace and workplace solutions to clients) agrees to provide material and services and the customer agency agrees to reimburse GSA's costs. It is a written statement from another Federal agency or non-Federal source (when authorized by statute) requesting PBS to procure commodities and/or services on their behalf. RWAs are established to capture and bill to customers the cost of altering, renovating, repairing, and providing services in space managed by GSA over and above the basic operations financed through Rent and in other properties managed by the federal community.), customers often have unique tracking numbers sometimes even from the office in the customer agency that is	GSA-4PFB	Per TT 5.3.10 mtg - agree to update BPN/DUNS	Y
56	287	Need to add a box to select for Special Programs. For example, on the GSA RWA form, customer agencies must declare if their funds are ARRA (American Reinvestment and Recovery Act - An Act making supplemental appropriations for job preservation and creation, infrastructure investment, energy efficiency and science, assistance to the unemployed, and State and local fiscal stabilization, for the fiscal year ending September 30, 2009, and for other purposes.) funds, which require special reporting and tracking. A Special Programs box would flag that additional disclosure documentation is required concerning the funding that the Seller should be made aware of for this IAA work. A short description line should be included in Field 21 to name the Special Programs that apply. For this example to write in ARRA.	GSA-4PFB	See Order Form; "Project Title" item in Box 28, "Order line/Funding Information" is where this information should be captured. Instructions have been revised to clarify.	Y

2	A Comment #	G Comment	H Organization (Agency or Company)	I Response	J Update Paper Form Y or N
57	296	What happened to the notion of explicitly worded responsibilities and accountability for buyer and seller ? The notion of packing language to cover expectations into an "additional seller clauses" box seems trite and insignificant. Worse yet would be to have a series of attachments to promulgate this info and further confuse the participating agencies with "hidden" information.	GSA/FAS/AAS	Per TT 5.3.10 mtg - see box #200	Y
58	297	Have we abandoned the notion of reviews of this document since it seems to be transactional data?	GSA/FAS/AAS	Per TT 5.3.10 mtg - update #20 - remove ""for assisted acquisitions."	Y
59	298	The paradigm seems to have shifted from General Agreement (terms and conditions/roles and responsibilities) to atransactional oriented dollar estimates and fee explanations . The June 2008 Part A enumerated seller value add in terms of roles and responsibilities as well as potential accountability matrices. Has it been replaced by a small text box? Additionally, confusion will abound on multiple order IAA where estimate is exceeded. Should it be modified continually to keep pace with unenvisioned agency activity that is still in scope? What purpose is there to bind a General Agreement by an estimate?	GSA/FAS/AAS	Per TT 5.3.10 mtg - see box #200	Y
60	299	It appears bona fide need of June 2008 part B has been replaced by a scope box with a specificity reference coming back from Order form Block 36 on quantity. A sure cause for further confusion	GSA/FAS/AAS	per TT 5.3.10 mtg - looking at new structure for line 28	Y
61	322	USDA 1. Comments from USDA/Rural Development/Operations and Management/Procurement Management Division/Policy and Program Management Branch: The Standard Template for IAAs is a very lengthy 20 page long document. It is suggested the document be streamlined, to encourage Government Agencies to comply with the requirement to use the document. The use of a more concise document will also help to insure that	USDA - AG	Most of the pages are instructions. We are working on the format.	Y
62	324	Page 1 of 8, Block Number 9 – Under Economy Act it is recommended that a reference to FAR 17.5 – Interagency Acquisitions Under the Economy Act be added.	USDA	Per TT 5.25.10 mtg - Update instructions with (FAR 17.5) reference	Y
63	325	Page 2 of 8, Block Number 16 – It is recommended that Joint Roles and Responsibilities of the Buyer and Seller be added .	USDA	Expanding Roles and Responsibilities area to capture on form	Y
64	326	Page 3 of 9, Block Number 20 – It is recommended that more space be provided for the signature and date blocks and other signature/date blocks throughout the Standard Template for IAA documents.	USDA	If there is room	Y
65	335	NARA 7. Since the Terms and Conditions (i.e., Statement of Work) will rarely fit on one page, recommend they be included as an attachment	NARA	Working on the format	Y
66	337	USDA 7. Page Number 1 of 12, Block Number 22 - The term "Modification" is used. However, in the General Terms and Conditions Section the term "Amendment" is used. It is suggested the term "Modification" be used consistently throughout both documents of the Standard Template for IAAs.	USDA - AG	Per TT 5.3.10 Mtg - no change - terms used per OFPP Assisted Acquisition document. (Same as 69, 337, 393) Will review instructions for clarity	Y
67	338	USDA 8. Page Number 2 of 12, Block Number 28 - It is recommended that all acronyms be defined throughout this document and the corollary General Terms and Conditions Section.	USDA - AG	Define all acronyms	Y
68	339	USDA 9. Page Number 11 of 12, Block Number 32 - It is recommended the Requesting Agency Contracting POC be added.	USDA - AG	Per TT 5.3.10 mtg update instructions for COTR/COR and additional POC optional boxes. This could be Program and Acquisition contacts or other poc, signatures are optional depending on an agencies need. (Same as #50)	Y
69	346	USDA 16. Also, what about monitoring; is there a COTR designated? We did not see that on the form.	USDA - AG	Per TT 5.3.10 mtg update instructions for COTR/COR and additional POC optional boxes. This could be Program and Acquisition contacts or other poc, signatures are optional depending on an agencies need. (Same as #339 & 50)	Y
70	351	HHS (5) References to fsio.gov (pp. 4 of GTC and p. 6 of IAA order) is outdated since the organization has closed and web contents will be transferred to the CEO Council Web site	HHS		Y
71	352	HHS (6) IAA order (p. 1, line 24 (b), select the advance accounting methodology) -- Cash basis is not GAAP and would not be used by Federal agencies	HHS	Correct, this is being updated to reference SFFAS #7	Y
72	356	SSA 4. Page 1, Section 9, Replace "Other Fund" with "Other Fund/Authority." Agencies cite other authorities such as the Clinger/Cohen Act GT&C	SSA	Yes - same as #29	Y
73	357	SSA 5. Page 6, Line 7, Update the link http://www.fsio.gov . The website will cease operations on 5/1/10. All FSIO documents will be moved to www.cfoc.gov GT&C	SSA		Y
74	359	SSA 7. Page 6, Line 7, Update the link http://www.fsio.gov . The website will cease operations on 5/1/10. All FSIO documents will be moved to www.cfoc.gov Order	SSA	Yes - same as #89, 117	Y
75	365	NGA 6. GTC Line 7. Advance Payments Allowed for Products/Services. Need to reference the statutory authority that authorizes the advance pay. Plus add a place for instructions on providing information on the status of the advances and any other information the agency needs to track the advance, e.g. amount obligated, expended, and available	NGA	5.18.10 - add authority if YES checked under #7 - Advance instructions to be updated	N
76	367	NGA 8. Order Form Line 23. Why doesn't the assisted acquisition have a performance period? Sending funds to another organization doesn't extend the life of an appropriation nor is it an open ended request.	NGA	The form will be updated wherever possible to include information for all IG types, including AA	Y

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77	378	FinCEN 3) The forms provided do not allow for noticeable procurement involvement; who establishes the general T&C's and what area is provided for Contracting Official's review? Is an area needed for contracting officer review?	Treas, FinCEN	Per TT 5.3.10 mtg update instructions for COTR/COR and additional POC optional boxes. This could be Program and Acquisition contacts or other poc, signatures are optional depending on an agencies need. (Same as #339, 346 & 50)	Y
78	384	ED (3) On the Order, #22: If a modification is needed and there is more than one line item , there is no way to indicate which line item is being modified.	ED	Order #22 to be updated per TT comments (AI #65)	Y
79	385	Page 1, Block 8, Estimated Agreement Amount: It is not clear why indicating the estimated amount of the agreement is not required for Assisted Acquisitions.	DHS	The form will be updated wherever possible to include information for all IG types, including AA	Y
80	388	Page 2, Block 11, Recommend providing examples of Limitations.	DHS	5.18.10 - Curtina - provided examples of limitations for IAA instructions Update name to "Restrictions" and update the instructions - Optional for all ADD TO INSTRUCTIONS: Examples of limitations include any acquisition laws, fiscal laws or agency-specific policies that are unique to, or that restrict, either the servicing or requesting agency. For example, for DOD this may be the Berry Amendment requires Department of Defense (DoD) to give preference to domestically grown, reprocessed, reused, or produced items related to food, textiles and hand or measuring tools on procurements over the Simplified Acquisition Threshold (SAT). The example used in our June 2008 guidance is...This interagency agreement shall not be used to procure real estate leasing or construction services.	Y
81	389	Page 2, Block 13, Change "...provided in TFM Volume I..." to "...provided in Treasury Financial Manual (TFM) Volume I..."	DHS	All acronyms will be spelled out.	Y
82	390	Page 2, Block 16, For Assisted Acquisitions, recommend including a listing of actual roles and responsibilities of the requesting agency and the servicing agency (as an attachment) based on OFPP's previous guidance issued June 6, 2008, entitle "Improving the Management and Use of Interagency Acquisitions," Appendix 4, Example of a Completed Interagency Agreement for an Assisted Acquisition, Part A.6 (pages 49-57). Agencies' files were lacking in such information per a previous GAO government-wide audit.	DHS	Per TT 5.3.10 mtg - agreed - Remove line GT& C line 16 and related instructions; Update GT&C #10 instructions to state that Scope/Statement of Work/MOU may be attached and may contain Roles and Responsibilities and bold; *Assisted Acquisition transactions must attach Roles and Responsibilities either separate or part of one of these documents. Update Order #28 instructions to read Scope/Statement of Work/MOU may be attached and may contain Roles & Responsibilities. (same as #200, 325, 390)	Y
83	391	Block 20, Remove the asterisks from before and after the words "Requesting Agency" and "Servicing Agency." These fields are required to be completed irrespective of whether or not the action is an Assisted Acquisition	DHS		Y
84	393	The GT&C Section contains numerous references to "Amendment." Please clarify that the General Terms and Conditions are "amended" and not "modified" when the parties agree to a change.	DHS	Per TT 5.3.10 Mtg - no change - terms used per OFPP Assisted Acquisition document. (Same as 69, 337, 393) Will review instructions for clarity	Y
85	395	Page 1, Block 3, Suggest moving the explanation regarding the need to complete all asterisked fields for an assisted acquisition to a footnote on each page for clarity.	DHS	*** removed	Y
86	396	Page 2, Block 11, Revise Description for Block 11 to read: "Limitations or Restrictions"	DHS	5.18.10 - Change title to Restrictions see #388	Y

	A	G	H	I	J
2	Comment #	Comment	Organization (Agency or Company)	Response	Update Paper Form Y or N
87	398	Page 2, Suggest adding advance notice of intent to terminate IAA similar to that from Section A.12 of the OFPP Model IAA entitled "IA Termination".	DHS	5.18.10 - BREAK OUT BOX 13 - Add A.12 IA Termination This IA may be terminated upon [insert number] calendar days written notice by either party. If this agreement is cancelled, any implementing contract/order may also be cancelled. If the IA is terminated, the agencies shall agree the terms of the termination, including costs attributable to each party and the disposition of awarded and pending actions. If the Servicing Agency incurs costs due to the Requesting Agency's failure to give the requisite notice of its intent to terminate the IA, the Requesting Agency shall pay any actual costs incurred by the Servicing Agency as a result of the delay in notification, provided such costs are directly attributable to the failure to give notice.	Y
88	399	Page 2, Add language similar to that under the OFPP Model IA, Section A.13 entitled " Interpretation of IAA " in order to establish order of precedence .	DHS	5.18.10 - add A.13 Dispute language	Y
89	400	Pages 4-8, Unclear why the GT&C instructions (pages 4-8) would be included as a part of the IAA GT&C. The GT&C instructions provide guidance in completing the GT&C form, and should be removed from the actual IAA GT&C upon completion.	DHS	Separate instructions from form	Y
90	401	Page 6, Block 9 offers various authorities. Another block needs to be included for Other Statutory Authorities " (e.g. Atomic Energy, Federal Real Property and Administrative Services Act).	DHS	See GT&C, #9 - Other Fund to be changed to Other Authority	Y
91	402	Page 4, Suggest removing the introductory paragraph about the new paradigm shift in GT&C instructions and start with the GT&C General Instructions.	DHS		Y
92	403	Page 4, General Instructions; 2 nd paragraph. Consider adding the reminder = "The period of availability of the Requesting Agency's funds that are obligated under an Interagency Agreement does not change except as specifically authorized by law. Under the Economy Act, 31 U.S.C. Section 1535, a Requesting Agency de-obligates any fixed year funds at the end of their period of availability to the extent that the Servicing Agency did not perform or incur valid obligations under an Interagency Agreement. When a Requesting Agency validly obligates its funds through an Interagency Agreement not governed by the Economy Act, the Requesting Agency does not have to de-obligate its funds at the end of their period of availability."	DHS	Agreed - change per other similar comments	Y
93	404	Page 4, General Instructions; 2 nd paragraph. Consider adding the reminder = " For Assisted Acquisitions, the Servicing Agency shall populate the Federal Procurement Data System (FPDS) when reporting any contractor order which results from the agreement (if required by current law, policy, or applicable regulations) "	DHS	5.18.10 - Okay - will add, but call by new system name FPDS-NG (next generation)	N
94	408	The instructions for item 9 indicate that the 'buyer' must keep a D&F on file for Economy Act transactions. However, the instruction does not cite the source of the requirement nor does it place potential preparers on notice that most Economy Act transactions must comply with the requirements of FAR 17.5 , Interagency Acquisitions. The form assumes that all preparers will be aware of these requirements.	DHS	5.18.10 - Add FAR reference- other agencies requested	Y
95	410	The check boxes in item 9 refer to the Economy Act or some other 'funds' statute. However, some statutes simply authorize the transaction but the transaction is not part of any type of 'fund.' (See, for example, the U.S. Coast Guard, 14 U.S.C. §141.) The instruction for item 9 refers to the possibility of 'any other legal authority' but item 9 itself does not make this clear.	DHS	5.18.10 - changing from Other Fund to Other Authority	Y
96	411	Page 6, Item 8: This item requires that the estimated agreement amount be indicated. However, we do not understand why this is made inapplicable to 'assisted acquisitions.' In an assisted acquisition , the servicing agency is providing procurement process services for which they must be paid. Ideally, the parties will set forth the specific services that the procurement process entails and the servicing agency should be able to make some estimate of the costs to be incurred in providing acquisition assistance.	DHS	5.18.10 - Changes: #8 = Optional Estimated Agreement Amount for Assisted Acquisition; Add explanation box under #28 for AA servicing fees per Order line	Y

2	A Comment #	G Comment	H Organization (Agency or Company)	I Response	J Update Paper Form Y or N
97	412	<p>Page 6, Item 7 — Advance Payment. This item directs the preparer to indicate whether advance payment will be 'allowed.' 1. This is misleading because IAA preparers may not necessarily be aware that advance payments are illegal unless specifically authorized by statute. (31 U.S.C. § 3324(b).) 2. This item should first ask whether advance payment is legally allowed by the statute that authorizes the IAA transaction. If legally allowed, then its accounting treatment may be prescribed. 3. The instruction for this item does not indicate that legal authority is required before advance payments may be 'allowed.' Instead, it refers to the "Standard Business Processes Reimbursable Management document for specific guidance. http://fsio.gov." 4. However, regarding the above website, please note the following: a. As far as we were able to determine, the above-cited document is not a stand-alone document. Instead, 'reimbursable management' is one of several management processes. (See embedded file.) It also states the following</p>	DHS	5.18.10 - box 7 to be updated to capture advance authority if YES checked and update instructions	Y
98	413	<p>Pages 6-7, Item 13: 1. This item indicates that terminations or disputes related to the IAA shall be resolved according to the Department of Treasury's Intragovernmental Business Rules. However, these rules seem to be designed to resolve financial and accounting issues. I am not sure how they can be used to resolve performance quality or timeliness issues. Also, it is not clear whether these interagency entities are well poised to resolve interagency legal issues, which might be well handled by the Department of Justice under Executive Order 12146, Section 1-401. 2. For assisted acquisitions, this item also indicates that the "Servicing Agency shall consult with Requesting Agency before agreeing to a settlement or payments to insure that the Servicing Agency has adequate time in which to raise or address any fiscal or budgetary concerns arising from the proposed payment or settlement." This is not enough. a. If the Requesting Agency is liable for costs related to protests, disputes and termination, the Requesting Agency cannot merely be "consulted" before the Servicing Agency agrees to a settlement or to any payment</p>	DHS	5.18.10 - adding language from OFPP A.12 and A.13 and other changes address this.	Y
99	414	<p>Items marked with asterisks (*) Both forms indicate the following: ""For assisted acquisitions, also complete all asterisk "" items." The above seems to mean that items with asterisks apply only to assisted acquisitions. 1. GT&C Item 16 has an asterisk and it asks that roles and responsibilities of buyer and seller be attached. There does not seem to be a roles and responsibilities requirement for IAAs that are not assisted acquisitions. a. However, non-assisted acquisition IAAs can be as complicated as those for assisted acquisitions, and, b. It is just as important to assign roles and responsibilities to the former. 2. GT&C Item 15 has an asterisk and it asks for a list of organizations authorized to provide assisted acquisitions. We do not understand this element because it seems to imply that an agreement can set up several assisted acquisitions with different agencies with one document and one justification. 3. GT&C Item 14 has an asterisk and it asks that a list of organizations authorized to request assisted acquisitions. We</p>	DHS	5.18.10 - "" are being removed and addressed	Y
100	421	<p>Page 4, Block 33 is excessive, recommend deleting the signatory requirement. Funding certification is received by the Contracting Officer (CO) and it is a responsibility of the CO to ensure appropriate information is included. The bona fide need and appropriateness of funds has already been reviewed and certified. The requirement for signatures will DRASTICALLY increase the amount of time it will take to get IAAs in place. We have a difficult time getting the servicing agency to sign in block 32.</p>	DHS	5.18.10 - 2 sets of signatures support IAA; CHANGE - add additional POC with OPTIONAL signature blocks	Y
101	422	<p>Page 1, Block 22, Recommend adding a row named "Line Item Number" (already in Box 28) to the "Modifications to FUNDING information" table. One or more line items may have changes to their funding, and adding an entry for the line item number will allow for accurate recording and reporting of that information. [If only the total amount is being changed, then the Line Item Number may be left blank.]</p>	DHS	5.25.10 - Update Modification table to recognize different line numbers, NSF, GSA	Y
102	423	<p>Page 2, Block 25, Provide an explanation and full text of the acronym IPAC (as was done for ALC, TAS, BETC and BPN on page 9).</p>	DHS	spell out all acronyms - many agencies	Y
103	424	<p>Page 6, General Instructions, The Financial Systems Integration Office (http://www.fsio.gov) ceased operations on March 31, 2010, and the web site will become inactive on May 1, 2010. The FSIO web page directs visitors as follows: "The FSIO documents now located on this web site will be transferred to the CFO Council web site www.cfoc.gov on or before May 1, 2010."</p>	DHS	update FSIO URL	Y
104	425	<p>Page 7, Item 22, Under "Modification," change the first sentence to "The Buyer checks..."</p>	DHS		Y
105	426	<p>Page 6, Instructions: Suggest moving the explanation regarding the need to complete various asterisked fields(*) only for assisted acquisitions to a footnote on each page for clarity. Page 1 of 12 indicates completing the Buyer and Seller as an asterisk item, yet this applies to all IAAs. May also consider separate templates for assisted and unassisted acquisitions.</p>	DHS	5.25.10 - agree to change re "" - duplicate	Y

2	A Comment #	G Comment	H Organization (Agency or Company)	I Response	J Update Paper Form Y or N
106	428	Page 4, Block 32, 33 & 35 , In most agencies, a Contracting Officer signature is required . In addition, a requirements official or POC may have been intended. This area may need clarification. In the past, block 32 may have been used for both program (requesting agency) program POC and contracting POC. It is unclear if the Contracting Officer signature would be represented in Blocks 32, 33 and/or Block 35. Also suggest making Block 35 read "Primary Point of Contact"	DHS	5.25.10 - update instructions for COTR duplicate	Y
107	429	Page 6-12, Unclear why the Order Requirements instructions (pages 6-12) would be included as a part of the resulting IAA since they are numbered 6 of 12, 7 of 12, etc. and include the IAA GT&C, Order # etc. The Ordering instructions provide guidance in completing the Order Requirements form content and would be removed from the actual IAA order upon completion and execution.	DHS	5.25.10 - separate instruction - duplicate	Y
108	431	Page 6, Suggest removing the introductory paragraph in ordering instructions and start with the General Instructions.	DHS	Remove	Y
109	433	The form lacks any reference or other guidance applicable to the requirements in FAR 17.5 Interagency Contracting under the Economy Act .	DHS	5.25.10 - Update instructions with (FAR 17.5) reference	Y
110	437	Recommend providing a definition of both the Standard IAA; and the Assisted Acquisition IAA.	DHS	Will update instructions	Y
111	444	Terminology — Buyers and Sellers. These terms should be eliminated and, instead, we should keep the terms used by the OFPP Guidance on Interagency Agreement, June 2008. This document refers to the 'Requesting Agency' (buyer) and the 'Servicing Agency' (seller). The latter terms are more encompassing than buyer and seller.	DHS	TT agrees	Y
112	446	Block 1 and Block 21 ask for the same info, however in addition to name and address Block 21 also asks for [remove] fax, phone and email . Block 1 should ask for exactly the same info as Block 21.	DHS	#1 asks for the Agency Information. #21 asks for the specific office. Personal information to be removed in #21	Y
113	452	Buyer signature blocks are not set up for contracting officer signatures and suggest that the buyer would be a program official rather a contracting officer as it should be. There should be a separate block for Program Official signatures and Contracting Official Signatures such as:	DHS	Instructions to be updated	Y
114	458	GSA 5. While the standardized forms are meant to facilitate the acquisition process, the pendulum has swung to the side of being "data heavy" perhaps at the expense of the integrity of the Interagency Agreement. For example, the format of the forms has lots of attachments instead of having the information embedded into the document itself. This structure could lead to problems if the attachments get separated from the standard form. These forms need to work not only for the more straight-forward, "vanilla" transactions, but also for the	GSA	No specific recommendation noted in this comment Instructions, which are assumed to be referenced as the attachments in this comment, will be separated from from.	Y
115	462	GSA 9. Order template - Box #28. Replace "Project Title" with "Project or Recurring Service Title".	GSA	Will updated instructions	Y
116	472	GSA 19. Section 4 - GT&C Action: On page 5 in the explanation for amendments, it states that "Authorization of an Amendment to the GT&C Section requires official signatures of both the Buyer and Seller." Don't all actions require both the signatures of the Buyer and Seller? If not, there is nothing in this document that states that. If so, then this statement is unnecessary and in fact, may cause readers to assume that new IAs or cancellation of IAs (the other two GT&C Actions) do not require both signatures. We recommend that this	GSA	Will add to signature box (#20) in instructions)	Y
117	473	GSA 20. GSA's Reimbursable Work Authorization (RWA) form (GSA Form 2957) includes certifying language on its face that requires a requesting agency official to certify that there is a bona fide need, that funding is legally available, that internal reviews/approvals have been completed, etc. The new form does not require a certification per se . The instructions explain that a signature signifies a confirmation of these same elements. (GSA specifically adopted certification language to make it clear to customer agencies that they	GSA	5.25.10 - update form to include 2957 verbage and updating instructions to remove *** and = for all for #32/#33	Y
118	474	GSA 21. GSA's RWA makes it clear that the process is collaborative and both parties have specific responsibilities . For example, GSA will assist the Agency in defining its requirements, GSA will perform acquisition planning, GSA will administer contracts, GSA will provide an independent government estimate, the Agency will provide funding, the Agency will not provide instruction to any GSA contractor, etc. The new form does not address many of these elements.	GSA	5.25.10 - Supersedes above comment: #16 to be expanded to capture general roles & Respons to avoid additional attachments. Update instructions to for Roles and Responsibilities for GT&C See 5.24.10 email A.6 OFPP guide - Roles & Responsibilities	Y
119	481	DOI 6. GT&C form Page 2, Section 12 - typically the socioeconomic credit goes to the entity awarding the contract. Please use more than an * to reduce confusion on this. Suggest starting the sentence in block 12 with "For Assisted Acquisitions any contract actions executed..."	DOI, USBF	Update per request	Y
120	484	DOI 9. Both - The form instructions should not be part of the forms. Suggest a separate form number for the instructions to save paper.	DOI, USBF	Agreed	Y
121	488	EPA 1. The form's reference to the partnering agencies as "Buyer" or "Seller" appears inappropriate. Many of EPA's IAs represent mutual and collaborative efforts with other agencies. We therefore recommend using "Requesting" and "Servicing" agency.	EPA	Agreed	Y
122	495	EPA 8. In a couple of sections there is a reference to http://www.fsio.gov. There is a message posted on that site that FSIO has ceased functioning as of 3/31/10.	EPA	Agreed	Y
123	497	EPA 10. Block 28 indicates that for assisted acquisitions only, the services must be classified as either severable or non severable. That distinction presumably applies to all IAs and would limit the expenditure of funds under severable services to the life of the appropriation.	EPA	updating form to remove Assist Acquisition restriction - will apply to all	Y

A	G	H	I	J
Comment #	Comment	Organization (Agency or Company)	Response	Update Paper Form Y or N
2	499	NRC	Updating information on form and in instructions Form will be flexible enough as to who will sign in each agency. Will not always be a Contracting Officer.	Y
124	NRC 1. The instructions for Item 32 of the Order form indicate that the ordering agency program official signs and the performing agency contracting officer signs. This is too prescriptive and is inconsistent with procedures followed by many Federal agencies. Instead, the instructions should indicate that the signatures in Item 32 consist of the following: Buyer Agency: Official delegated authority to obligate the agency's funds. Seller Agency: Official delegated authority to accept an interagency agreement.			
125	500	OPM	Instructions will be separated from from the form. NSF is piloting this form and have put into practice your recommendation for ease of use.	Y
126	512	Treasury, BPD	5.25.10 - will change italics to "OPTIONAL" on form	Y
127	515	Treasury, BPD	Update instructions	Y
128	540	DOI	Instructions will be separated from from the form.	Y
129	541	FMS/OMB	5.25.10 - update instructions for Project Title only Use TFM to do updates to form	Y
130	550	GSA-AAS	Changing to Requesting and Servicing Agency	Y
131	551	GSA-AAS	Change to agreed upon by Req Agency and Servicing Agency.	Y
132	554	GSA-AAS	5.25.10 - Interagency Contracting is not assisted acquisition. It is an interagency agreement. Will update instructions with definition for Assisted Acquisition in instructions. <i>This comment speaks to general confusion about implementing from OFPP Part A and B to new IAA. Need good guidance from OMB OFFM and OFPP.</i>	Y
133	556	GSA-AAS	Update Form Date	Y
134	559	GSA-AAS	Define Assisted Acquisition in instructions (see 554)	Y
135	560	GSA-AAS	Clarify directions	Y
136	565	GSA-AAS	Optional for Assist Acquisitions; adding explanation for fees for Assist Acquisitions in Order	Y
137	566	GSA-AAS	Other Fund changing to Other Authority	Y
138	567	GSA-AAS	Instructions updated to capture SOW	Y

	A	G	H	I	J
2	Comment #	Comment	Organization (Agency or Company)	Response	Update Paper Form Y or N
139	568	There is a lack of specificity in the definition of "Limitations." Are we to infer this field is to reference any unique requirements of regulations from the Requesting agency?	GSA-AAS	Changing title and instructions	Y
140	570	Define what is meant by "agencies' business" as specified in the last sentence.	GSA-AAS	wording being changed to OFPP A.12 and A.13	Y
141	571	What is meant here? Is it intended to list organizations authorized to request or provide assisted acquisitions solely as it pertains to this specific IAA, or something more broadly?	GSA-AAS	5.25.10 - update instructions for just this agreement - not in general	Y
142	572	This strikes at the heart of one of our concerns. Here, a primary purpose of an IAA is reduced to a single attachment that could easily be separated from the main document. An IAA should be defining the roles and responsibilities of Requesting and Servicing agencies as part of its basic structure rather than diminishing it to an attachment	GSA-AAS	Updated to capture in IAA	Y
143	574	Need some language on the Signature block noting that it must be signed by someone authorized to enter into Interagency Agreements. Right now, that is buried in the instructions and it is important enough to be spelled out up front. The instructions for this field states, "The Agency Official is the highest level accepting authority or official designated by the agency to sign this agreement." What is meant by "highest level accepting authority"? Who would be authorized to enter into an IAA? Does this mean that the GSA Administrator must sign all IAs? Why not just state "The Agency Official is the official designated by the agency to sign this agreement." The form itself does not include any guidance regarding who can sign (must refer to instructions for guidance).	GSA-AAS	Add to form	Y
144	575	Assisted Acquisitions are required to have an annual review. This requirement needs to be made more visible on the form. Also, how is this review to be documented?	GSA-AAS	5.25.10 - removing Assis Acquisition reference on GT& C and in instructions	Y
145	583	Why is Performance Period not applicable for Assisted Acquisition? This delimiter is very important to assisted acquisition providers.	GSA-AAS	updating form to remove Assist Acquisition restriction - will apply to all	Y
146	589	Suggest you put the Bona Fide Need and Description of Assisted Acquisition Service as separate line(s) BEFORE the funding specific information is provided. The Type of Contract Requirement and Project Milestones should also be with the Bona Fide Need and Description information. That way the stage is set for what is being requested and all funding information would be contiguous. Right now, the existing Field 28 has some funding information, then the Bona Fide need and Description, and then additional funding information related to funding expiration, dollar amounts, then contract requirement and project milestones, then unique restrictions. Having all funding related information together will make it easier to find, easier to maintain, and easier for data entry.	GSA-AAS	#28 to be updated	Y
147	591	Project Title/Description and other identifiers should be moved before funding information	GSA-AAS	#28 to be updated	Y
148	602	Section should have a cumulative figure that sums all the line items on the (Order) funding document. For example if there are 5 line items for \$1,000 each there should be a cumulative total for the order would be \$5,000.	DoD	5.25.10 - Add total to Order for all sum of all lines	Y
149	603	1) Recommend changing sentence to: "This standard form is the beginning of a paradigm shift in how the U.S. Government does reimbursable business. It facilitates communication between the Buyer/Requesting Agency and Seller/Servicing Agency and enables them to agree on the terms of the transaction and the information that is required by the Financial Management community to reconcile the transaction before business begins." This guidance should not only include an agreement on the term of the transaction as the terms may already be known by the buying and selling organization; however the required data elements are not always sent to the accounting/Financial Management (FM) organizations. 2) Acknowledgment that set data elements are required to be sent to FM at a specific time on both sides of the IGT is essential to balanced eliminations.	DoD	1) updating general instructions 2) internal operating procedures for agency. Recommend you taking this opportunity to provide leadership in the implementation of the IAA and correcting any practices.	Y
150	607	Form appears to be divided into two parts that are both required. Recommend they be combined into one so that duplicate parts can be eliminated. It will also prevent confusion since the Instructions for each part are currently numbered pages for each part. Once the IAA is smooth for signature, most people would not want the Instruction pages included in the package and what is left would be oddly numbered and difficult to determine if a page is missing. Parts that are duplicated between the IAA Order Requirements + funding Section (ORFIS) and the General Terms + conditions (GT+C) are: a. Line 5 Agreement Period and Line 23 Performance Period; b. Page 4 of 8 and 6 of 12 are almost exactly the same; c. Page 4 of 8 states that "a copy of the GT+C Section must be kept with the orders it supports". Then why have two sections in 2 different forms with different page numbers if you have to keep them together? It is understood that there might be a legal different between the "agreement" and an "order" but it makes sense to at least keep the pages to be filled in all together.	DoD	Two sections will remain separate; instructions will be separated	Y
151	608	Remove the Instructions from the numbered part and have them be a stand alone document so that ALL completed IAs will have the same number of pages, but might have extra attached documents to provide additional explanation as needed.	DoD	Ok	Y
152	609	There are no instruction anywhere on where the GT+C # comes from.	DoD	Update instructions with: Each Buyer should manage or agree on the IAA number until an automated Intragovernmental Solution is released	Y

2	A Comme nt #	G Comment	H Organizat ion (Agency or Company)	I Response	J Update Paper Form Y or N
153	611	Recommend replacing the word "items" at the end with "Lines" since that is how all the numbered boxes or blocks are referred to in the Instructions.	DoD	Agree	Y
154	613	Lines 4 and 22 references "updating the box(es)" but the instructions call them "Lines". Which is it? Be consistent throughout the document.	DoD	Lines - will change #4 and 22 form and instructions to Lines	Y
155	616	Recommend adding a Working Capital Fund box since this is the DoD equivalent of a Franchise and Revolving Fund	DoD	5.26.10 - include box and update instructions for citation for WCF	Y
156	617	Page 6 of 8 for Sellers Authority, the part for the Economy Act should be revised to read "the Buyer shall complete a Determination and Finding, keep it on file and provide a copy to the Seller when requested." DFARS + FAR requires a copy to be provided to the Seller when a contracting action is performed as part of providing the service to the buyer. (DFARS 217.504 and FAR 17.504)	DoD	Adding FAR 17.5 reference Original D&F wording to remain FAR 17.504 does not mandate that a copy of the D&F be provided; FAR 17.504(a) simply gives discretion to Seller to require a copy of the D&F to be furnished with the Order. Since the DFARS are specific to DOD, it would not be appropriate to incorporate their requirements into this form, which is intended for governmentwide use.	Y
157	618	Page 7 of 8, Line 16, There is an * for this one, I believe that this should be required for <u>all</u> IAAs not just IAAS for AAs.	DoD	Roles and Responsibilities being updated	Y
158	619	Page 7 of 8, Line 20, the top part says "review" by the date box at the bottom says Approval. Is this the approval of the agreement, or just the date the review was completed? Strongly recommend replacing the word "Approved" with "Review". OR, remove the "Review of Document" and replace with Approval of Agreement since the instructions for line 20 on page 7 of 8 seem to indicate that this line is where each party approves the agreement. If so, recommend changing the title of line 20 to "Agency Approving Official".	DoD	Due to the confusion around the annual review of the IAA, will move this information to the General instructions.	Y
159	625	Support agreements often involve actions from both the requesting and providing agency. There needs to be a section for each .	DoD	Updates to R&R	Y
160	626	The instructions state to include language if this is a recurring agreement. To simplify, recommend placing a check box instead at bottom of block, such as: Recurring Agreement: ___Yes ___No	DoD	Add box and update instructions	Y
161	627	For a number of the mandatory items, there are specific instructions for filling out the form for assisted acquisitions but not other IAAs. Suggest the instructions be clarified with direction for non-assisted acquisition IAAs.	DoD	Instructions will be clarified	Y
162	628	The terms "Buyer" and "Seller" don't work as well as "Receiver" and "Supplier" or use the terms Requesting Agency and Servicing Agency.	DoD	Updating form to Requesting Agency and Servicing Agency	Y
163	630	Line 28 - Funding Office Code - do we need	TT	5.25.10 - remove Funding Office Code and Instructions	Y