

	A	B	C	D	E	F	G	H	I	J	
1	IAA IMPLEMENTATION ISSUES										
2	Comment #	IAA Section GT&C, Order, or General	Page #	Section Number	Section or Subsection Heading Reference	Excerpt from Document	Comment	Organization (Agency or Company)	Response	Update Paper Form Y or N	
3	3	KEY:	color	Change Form Code	Action						
4	6			I	Implementation Issue - Outside of Form change scope						
5	55						NEA 1. As a small grant-making agency, some of our interagency transactions are joint efforts where either or both sides may provide unreimbursed services to issue grants or cooperative agreements. Reimbursement is provided through the IAA for only the full or partial cost of the grants or cooperative agreement awarded. No reimbursement is provided for NEA's staff time for monitoring the project (financial document processing, reporting or programmatic). This form does not address the requirements of SFFAS 4 & 30, which "requires that unreimbursed or under-reimbursed costs of the performing agency be communicated to the recipient of services". Our ability to use this as a standard form will be affected by the need to include such information in our IAAs as required by our financial statement auditors (and supposedly all auditors) concerning SFFAS 4 & 30, etc. See below for a sample of what we are currently including in our IAA's:	NEA	Agencies should use the additional Buyer/Seller clauses to capture specific business processes related to their IAAs	I	
6	114	General					General comment: Implementation of these forms at a manual stage will cost agencies time and money. Not only will there be paper copies of a form floating around, but additional staff will be needed to track and fill out these forms. In addition, depending on the financial system, as is the case at Census, the agreement and order information must be entered into the core financial system. This would mean that we would continue to have to do the work in the system, and then also add additional manual work to accomplish the same outcome.	DOC	We (OMB/Treasury) are working on an implementation strategy for the IAA. We are interested in working with the agencies to help them with this challenge.	I	
7	130	General					General Comment: Already have multi-year agreements in place with Federal partners. Will amendments/annexes to those already existing agreements need to follow this new form?	DOC	Implementation Issue	I	
8	131	General					General Comment: Is this form only for funded agreements between Federal entities? Not to be used with other partners or for unfunded general collaborative work between Federal partners?	DOC	What is unfunded ...	I	

	A	B	C	D	E	F	G	H	I	J
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9	249	General	T&C doc	Implementation question	General		If this new IA template is implemented, how do we amend the existing agreements? Do we use this new form or continue to use the old forms? These might have different T&Cs.	GSA/FAS/ Controller	guidance on how to modify an existing IAA on an old form?	I
10	281			General	General		It is critical that the federal community and Treasury recognize the magnitude of the change deployed in the June, 2008 OFPP mandated IA process. The potential of restarting this change (not building on what is in place) in a years time would set the stage for potential problems on numerous fronts: 1) Data Integrity 2) Compliance 3) Transitional Inertia 4) Disjointed Implementation 5) Acquisition and Financial Functional Confusion 6) Systemic Inability to Catch-Up With Changes.	GSA/FAS/ Office of the Controller		I
11	295	GT&C		General	General		Considerable Agency resources have been expended to implement OFPP IA policy including mandated forms since June 2008 issuance. The proposed IA GT&C contains no wording on terms and conditions, and seems to now be a data driven template instead of a worded agreement. Furthermore, internal AAS system processing of IA data and numbering is not based on buyer assignment of numbers. A paradigm shift of this nature would require significant leadtime to implement. The volatility of the proposed changes on the heels of previously issued guidance leads one to conclude that perhaps any future changes should be contingent on an automated information exchange across agencies (e.g. webservice utilizing digital signatures). Presently, AAS is in the midst of an audit regarding DoD work. Further paper changes to the IA process will only serve to confuse our Government agency clients and promote the proliferation of alternative documents and the likelihood of data integrity issues. The IA of June 2008 contrasted with the draft forms attached appear to move toward a transactional approach in lieu of a	GSA/FAS/ AAS		I

IAA2 comments.responses Implementation Issues

	A	B	C	D	E	F	G	H	I	J
2	Comment #	IAA Section GT&C, Order, or General	Page #	Section Number	Section or Subsection Heading Reference	Excerpt from Document	Comment	Organization (Agency or Company)	Response	Update Paper Form Y or N
12	301		n/a	General	General		<p>On June 6, 2008, the OFPP released a detailed 70 page guide for agencies to use when doing interagency acquisitions. The guide was promulgated at the direction of Congress and with the coordination among many agencies with a stake in the process. This guide includes a model Interagency Agreement in a format that clearly reflects the goals and guidance OFPP provided. The model agreement includes detailed instructions for tailoring and completing the model (IA) agreements that result in accomplishing the goal of OFPP, to improve the use and management of IAAs and identification of the responsibilities of signatories. Since the release of the June 2008 guide, GSA has followed the OFPP model with great success, achieving the improvements in IAAs as outlined by OFPP.</p> <p>The proposed Treasury Dept SF for IAAs would not improve or enhance the IAA process at GSA. In fact if GSA were to switch formats from the OFPP model to the proposed Treasury standard, GSA would have to begin a thorough process of tailoring the new form's information for use by GSA. This exercise has already been d</p>	GSA-QV		I
13	303			General			<p>The General Services Administration reserves the right to continue using its Reimbursable Work Authorization (GSA Form 2957) as the Interagency Agreement with its Customer Agencies as the agreement of record for PBS reimbursable services. GSA will add necessary data elements in addition to existing elements to accommodate new requirements as appropriate. GSA PBS uses this agreement under the authority of 40 U.S.C. §592(b)(2).</p>	GSA/PBS		I
14	310			General			<p>The General Services Administration reserves the right to continue using its Occupancy Agreement (OA) as the Interagency Agreement with its Customer Agencies as the agreement of record for rental of space. GSA will add necessary data elements in addition to existing elements to accommodate new requirements as appropriate.</p>	GSA/PBS		I

	A	B	C	D	E	F	G	H	I	J
	Comment #	IAA Section GT&C, Order, or General	Page #	Section Number	Section or Subsection Heading Reference	Excerpt from Document	Comment	Organization (Agency or Company)	Response	Update Paper Form Y or N
2	318			General			As one of the biggest (if not the largest) broker for Assisted Services in the Federal Government, GSA needs to have a loud voice in this process. We thought we had that voice. The Office of Assisted Acquisition Services (AAS) spent months working with OFPP and other agencies on the guidance, data elements, and sample templates that are contained in OFPP's June, 2008 guidance. AAS then worked with our internal folks and clients to implement that guidance and template. The Treasury template is quite a bit different. Why is Treasury now proposing something different than what the government-wide group developed and what AAS has implemented? Did the group who developed the draft have any knowledge of the work done in the past year? If so, what discussion ensued? If not, why not? The forms appear to minimize, trivialize, or simply ignore the discipline that the June, 2008 OFPP guidance injected into the interagency agreement process	GSA QB		I
15	319	GT&C	1	Blocks 3-6	Buyer (Requesting Products/Services)	Number 3 asks for Bureau Code...	These financial data elements do not belong on the GT&C Form. 1. These data elements are needed on the IAA Order so that the Order contains, in one place, all of the necessary financial data. 2. The GT&C (currently called Part A) is not intended to be a financial document. In the draft standard process for reimbursables, the IAA's "Part A" or "GT&C" is not a financial document in that no accounting relationship is established between the IAA Number and its associated IAA Order (Part B) numbers. Although the IAA Orders/Part B's are supposed to reference the IAA Number/Part A, the IAA GT&C/Part A does not accompany each IAA Order (Part B) through the obligation process and through the Unfilled Customer Order process. The IAA Order/Part B stands alone when the orders are being placed, with only a reference to the IAA Number/Part A Number. The IAA Number is a "parent" of the associated orders from an acquisition perspective, but from the financial perspective, the IAA Number is not a true parent because the Orders are not "children" linked via any accounting relationship.	GSA/FAS/ Office of the Controller		I
16	320	GT&C	1	Blocks 3-6	Buyer (Requesting Products/Services)	Number 3 asks for Bureau Code...	These financial data elements do not belong on the GT&C Form. Adding to the two points laid out in my other feedback block on this issue, here is a third point. 3. We have interagency agreements where funding comes from multiple sources. In this type of scenario, GSA will receive a separate IAA Order/Part B from each funding source. You cannot assume that the "Buyer" listed in the GT&C will be the exact organization submitting an order. We have existing projects today where this is the case.	GSA/FAS/ Office of the Controller		I
17										

IAA2 comments.responses Implementation Issues

	A	B	C	D	E	F	G	H	I	J
2	Comment #	IAA Section GT&C, Order, or General	Page #	Section Number	Section or Subsection Heading Reference	Excerpt from Document	Comment	Organization (Agency or Company)	Response	Update Paper Form Y or N
18	323	General					It is recommended that the Office of Management and Budget (OMB) provide government-wide training in the use of the Standard Template for IAA documents and that an on-line tutorial be provided on the OMB website . Users should also be able to download fillable forms to include the General Terms and Conditions Section and Order Requirements and Funding Information Section.	USDA		I
19	353						SSA 1. Currently, some (but not all) agencies have adopted the IAA clauses required under the OMB Memorandum M-07-03 and the Business Rules for Intra-governmental Transactions in the Treasury Financial Manual, Volume 1, Bulletin 2007-03. Other agencies (fewer in number) have adopted the model IAA recommended in the OMB guidance on Interagency Acquisitions, dated June 2008, which differs significantly from the model now proposed. For this reason, we want to stress that the proposed process and model will not be effective and may even create more inconsistencies and confusion among various agencies unless OMB and Treasury are successful in requiring and enforcing <i>all</i> federal agencies to adopt this	SSA		I
20	360						NGA 1. What is the definition of Interagency as it relates to when this form is required? Is it only intended to be used when the agreement is between Federal Agencies (Interagency) or should Federal Agencies also use it for Intra-Agency transfers that go through Treasury? For example, if one DoD agency has a reimbursable agreement with another DoD agency and the payment is going through IPAC will they be required to use the form? What about one major command to another major command that is in the same military department and the payment is going through IPAC? I am not an expert on payments but I am concerned that there are more than just payments BETWEEN Federal Agencies that the developer of the form might have want covered/included.	National Geospatial Intelligence Agency (NGA)		I
21	362						NGA 3. What if the agreement doesn't involve any payment at all? Do we still use the IAA? Is it possible to standardize when MOAs MOUs and IAA will be used?	NGA		I

IAA2 comments.responses Implementation Issues

	A	B	C	D	E	F	G	H	I	J
2	Comment #	IAA Section GT&C, Order, or General	Page #	Section Number	Section or Subsection Heading Reference	Excerpt from Document	Comment	Organization (Agency or Company)	Response	Update Paper Form Y or N
22	369						NGA 10. Has the working group considered a dollar limit for requiring a GTC? If the purchase of goods or services is below \$100K (or any other amount the working agrees to) Can we just use the Order Requirements and Funding Section without a General Terms and Condition section?	NGA		I
23	370						NGA 11. Implementation date. A number of agencies have automated their Interdepartmental Purchase Request forms. DoD agencies often use a Military Interdepartmental Purchase Request (MIPR). To change the format over to the IAA is going to require time and funding. Will agencies that use another form be allowed to continue to use their form by attaching it to the IAA until they can implement the new form? If not, we will lose a critical internal control tool.	NGA	We (OMB/Treasury) are working on an implementation strategy for the IAA. We are interested in working with the agencies to help them with this challenge.	I
24	380						FinCEN 5) Procurement writing systems are currently being used for both reimbursable and payable agreements obligations for tracking and payment purposes. Are agencies experiencing disconnects between the financial and procurement offices on reimbursable IAA's?	Treas, FinCEN		I
25	383						ED (2) There are many agreements currently in varying stages of development and clearance. When deciding on an implementation date, allow for current agreements that are in the works to be completed on their existing forms before requiring the use of the new forms. I vote for starting with FY 2011 agreements.	ED		I
26	434	General	IMPLEMENTATION ISSUE				!!! The development and planned implementation of the form seem to lack any preceding proposed FAR changes or any other draft financial management regulatory changes that would ordinarily be issued along with the proposed form. We would expect to see publication of the agreement's foundational policy guidance along with the General Terms and Conditions in an appropriate proposed regulation concurrently with the processing of the Standard IAA Form.	DHS		I
27	436	General					The enabling legislation for DHS included a provision whereby DHS may use the DOE Labs under the "work for others program," which has allowed DHS to implement streamlined arrangements in its IAAs with DOE. Will these standard forms be mandated for use with all IAA?	DHS	We are working on an IG inventory of transactions to determine where the IAA will be used. Can you provide this inventory from DHS? We can discuss/provide format	I

	A	B	C	D	E	F	G	H	I	J
2	Comment #	IAA Section GT&C, Order, or General	Page #	Section Number	Section or Subsection Heading Reference	Excerpt from Document	Comment	Organization (Agency or Company)	Response	Update Paper Form Y or N
28	438	General					The guidance does not address procedures for how agencies should processing intra-agency type agreements internally. Will agency internal guidance be deemed sufficient by OMB?	DHS		I
29	439	General					Recommend including guidance similar to that which is outlined in OFPP's previous guidance issued June 6, 2008, entitled "Improving the Management and Use of Interagency Acquisitions," regarding the need for an oversight review process - which was outlined in the guidance (see page 7, albeit for assisted acquisitions outside the <i>Economy Act</i>). OFPP's guidance called for the requesting agency to ascertain whether or not "expertise or acquisition resources were readily available within the agency" for purposes of ensuring that agency individuals (program offices) who establish the need for an IAA have the <u>required business expertise</u> to make those business decisions to enter into the IAA. Program offices which are deemed, by the acquisition office, to be without sufficient business expertise shall be required, at certain thresholds (\$200K, a review; and \$500K, a written concurrence) to have the IAA reviewed by the acquisition office that is normally responsible for providing assistance to the requiring office.	DHS	Recommend agency internal control process for implementation	I
30	487						EPA has serious concerns with OMB's proposed Standard Interagency Agreement (IAA) Form. Of particular concern is the apparent failure of the form to properly accommodate EPA's interagency activities authorized under the Agency's Cooperation Authority . We also find troubling the timing and amount of costs that would be required to fully implement the IAA form at EPA. As part of the Agency's consolidation of the interagency agreement (IA) function under a single IA Shared Service Center, EPA refined its Integrated Grants Management System to provide an electronic system for processing and awarding IAs. The process includes a new electronic funding form that automatically populates the IA with the required information. EPA completed the deployment of the automated process just a few months ago and is in the process of completing the final phase of extensive training on the new system. Requiring EPA to use OMB's standard IAA form would require substantial reprogramming and training costs. EPA has not budgeted for such additional expenditures and would need considerable time to implement the form Agency-wide. EPA has rais	EPA		I

	A	B	C	D	E	F	G	H	I	J
2	Comment #	IAA Section GT&C, Order, or General	Page #	Section Number	Section or Subsection Heading Reference	Excerpt from Document	Comment	Organization (Agency or Company)	Response	Update Paper Form Y or N
31	489						EPA 2. It is unclear how implementation of the new form will affect existing agreements; i.e., will it be necessary for existing agreements to be converted to the new form if and when an amendment is required.	EPA		I
32	491						EPA 4. There is no easy way to recognize cost sharing , which may be contemplated under EPA's Cooperation Authority IAs. The IAA form appears to be crafted for those situations where one agency is acquiring goods and/or services from another agency at a cost. EPA awards a significant number of IAs under cooperation authorities which involve cost sharing .	EPA	5.25.10 -HHS can do this type of agreement and so can GSA with DoD for Fed Reg with this form. Can work with EPA on implementing this IAA for these coop authorities. Use box 9 Other authorities to cite.	I
33	506						OPM 7. What will be done to institutionalize use of the forms government-wide? For instance, will this replace MIPPRs?	OPM	Yes, the IAA will replace the MIPR. OMB/FMS is working with DoD on this effort	I
34	507						OPM 8. Recommend that OMB provides clear training to all agencies on how to use the form and how to obtain all the necessary information. With that said, guidance should also make it clear that the buyer will take the lead in completing the forms.	OPM	OMB/FMS are willing to come to agencies to provide training, such as we are doing with NSF. Please contact Kim Farington or Robin Gilliam to set this up.	I
35	510						BPD 1. Our main concern with implementing this form is the time frame. This form varies greatly from the form we currently use and are concerned with an implementation date anytime prior to the beginning of fiscal year 2011. Also, it does not make for best business practice to change the form or naming convention mid-year. Also, without a sound Adobe Interactive version, will agencies be expected to print and hand write all of their inter-agency agreements? If so, this will create a magnitude of work for our agency. Our hope and suggestion is the form be developed into a fillable form, made available for agency use prior to 10/1/11 but not required.	Treasury, BPD	An adobe interactive form will be available	I
36	520						AG 3. This is all very nice for major agreements, but a tad overbearing (i.e., will never be done correctly) for a one-time \$10,000 Economy Act agreement where essentially you have to fill out duplicative forms.	AG/USDA	How to implement for smaller agreements/agencies -	I

IAA2 comments.responses Implementation Issues

	A	B	C	D	E	F	G	H	I	J
2	Comment #	IAA Section GT&C, Order, or General	Page #	Section Number	Section or Subsection Heading Reference	Excerpt from Document	Comment	Organization (Agency or Company)	Response	Update Paper Form Y or N
37	548	General Concerns					The transmittal message specifies that "Once the final IAA is issued, agencies would be required to use the new IAA form." We would recommend, for the sake of our clients and our internal workforce that at the very least it be required on a going-forward basis . Applying this retroactively to the hundreds of existing agreements based on the 2008 memo would cause undue confusion and disrupt long-standing client relationships.	GSA-AAS		I
38	581	Order					Instructions Section on Page 6 states, "Assisted Acquisitions – The Order Requirements and Funding Information Section serves as the funding document. It provides specific information to ensure that the Requesting Agency (Buyer) demonstrates a bona fide need and identifies the associated funds. This allows the Servicing Agency (Seller) to provide acquisition assistance and to conduct an interagency acquisition." We disagree that the Part B IA is the funding document. Each agency has their own funding document to transfer the funds. For example DoD transmits the funds via a DD Form 448 and we accept the Funds via a DD Form 448-2. This is required per DFARS 253.208. Other agencies have similar requirements and procedures and this OFPP memo is not going to change the method that Requesting Agencies transfer funds and the internal forms they use. The instructions in this draft document are only going to confuse users regarding what is the actual funding document. We have no problem with the statements, "It provides specific information to ensure that the Requesting Agency (Buyer) demonstrates a bona fide need and identifies the	GSA-AAS		I
39	582	Order		22			The box for Funding modifications is oddly placed and will get out of control quickly on some larger projects with multiple funding documents supporting various requirements under a number of task orders. Suggesting a row format with the From, By, To as column headings versus From, By, To rows and columns for funding in a table that will spread out across the document. Why are we tracking funding modifications on the IA? The funds tracking can be done through the actual funding documents (DD Form 448 or other agency funding document) which would become attachments to the IA. It is not practical to keep a spreadsheet type format on the IA. We have numerous orders that are incrementally funded and over a 3-5 year period and we can receive several hundred funding documents and process over a hundred modifications. Attempting to track all funding modifications on the actual IA form is inefficient and ineffective. We have automated systems to track and manage funds, why create a manual spreadsheet on the IA? If some offices want to track funds on the IA then make it optional but don't make it a requirement for everyone	GSA-AAS		I

	A	B	C	D	E	F	G	H	I	J
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2	593	Order					Are the Buyer Funding Expiration Date and Cancellation Date supposed to track this information for each Funding Citation? If so, do you know how long some of these IAs are going to be with hundreds or in some cases thousands of fund citations associated with a task . How is it effective to duplicate the information already on the actual funding document (DD Form 448 or other agency funding document) and transpose it onto the IA.? Again, we do not track or manage our funds based on some manual spreadsheet on the IA. We (and the FSC) track and manage funds based on information in our electronic systems (ITSS, ITOMS, etc.).	GSA-AAS		I
40	599						These comments represent DoD's preliminary comments and assume the use of the draft IAA for those transactions included in the scope originally envisioned (level one [between DOD and other federal agencies] reimbursable transactions currently using MIPR). Based on discussions with Treasury and OMB, DoD is compiling the DoD "inventory" of types of IGT transactions and our assessment of whether the proposed IAA can be used for those transactions. Further comments may result from this effort. We look forward to working with Treasury and OMB to come to agreement on the scope of DoD IGT transactions for which the proposed IAA will be implemented.	DoD	Comment period closed on April 20th. Any additional work will be around implementation of the IAA with agencies	I
41	600						Implementation of the IAA even for level one reimbursable transactions only will require significant, consistent policy and process changes plus related training across all agencies. Within DOD, there are hundreds of organizations with thousands of employees (both financial and acquisition) who use the current MIPR form and will require training. Additionally, legacy and currently in development ERP systems will not provide automated support to the IAA process initially. The effort may have to be manual until system support is available. Modification of the legacy systems scheduled to be replaced by ERPs may not be cost effective. DoD believes a phased implementation of the proposed IAA will be required for the transaction types ultimately determined to be "in scope." We look forward to working with Treasury and OMB to develop a phased implementation approach for DoD. A phased implementation strategy would provide lessons learned opportunities to facilitate IAA success.	DoD		I
42										

	A	B	C	D	E	F	G	H	I	J
	Comment #	IAA Section GT&C, Order, or General	Page #	Section Number	Section or Subsection Heading Reference	Excerpt from Document	Comment	Organization (Agency or Company)	Response	Update Paper Form Y or N
43	604	Order	2	28	LINE: Number		Since the note indicates that there is no limit to the number of lines on an order (not sure if COTS packages will support this concept), it is unclear if box 28 is repeated however many times necessary to complete the entire order. Since Buyer funding information could potentially change from line to line, this box would appear to need to be repeated, and could make for a very large document given there is no limit. That amount of paper would seem to be contrary to the Paper Reduction Act. In fact, even without multiple lines, this proposal creates a 5 page document to replace the MIPR document within the Department of Defense that currently is only 2 pages.	DoD		I
44	605	Order					Will the IAA form be standard or just another form option? Meaning, will this eliminate continued use of the various Service unique forms in addition to the DD448/DD448-2? If not, this does not appear to be an improvement or standardization?	DoD	The IAA will be the standard for reimbursable, grant and assisted acquisition transaction types governmentwide.	I
45	606	GT&C					Similar to above, will the IAA GT&C be used to replace the current standard forms used today (MIPR/ISSA/MOA/MOU)?	DoD	MIPR - yes; MOU/MOA - sometimes working to define in the updated IG Business Rules	I
46	620	Order	1	23	Performance Period		Clarification or Designation is needed if this is a Contractual Period of Performance (PoP) or PoP for funding availability. Also regarding PoPs, Line 23 has start and end dates which would be needed to help establish an accrual schedule based on anticipated delivery dates. How would a multiple step delivery be accommodated? For example, delivery of equipment and associated maintenance. Would two separate order requirements be completed? Or would there be a way to set up two different periods of performance to help the operational accounting teams establish appropriate accrual schedules?	DoD	Per discussion 5.25.10 - PoP is not for funding availability. PoP is for goods/services deliverables. If PoP is different for multiple step delivery, then an Order would need to be filled out for each	I
47	622	Both					Some of the lines say to include something as an attachment. Strongly recommend adding a line that is titled "Attachments" which provides a formal list of attached documents or pages that are needed to support any of the lines. This is important because any attachments can include extremely valuable information and if not formally listed in the package, no one will know to look for any attached documents if they are not actually attached in the files and not listed in the IAA.	DoD	Individual sections that require attachments, ask the agency to list the attachments that are included.	I