

## GSA ORDER

Subject: General Services Administration Acquisition Manual; GSAM Case 2023-G505, COWB Updates

1. Purpose. This order transmits a revision to the General Services Administration Acquisition Manual (GSAM) to streamline and coordinate the agency-wide processes for warrant appointment for contracting officers.
2. Background. On January 19, 2023, the Office of Federal Procurement Policy (OFPP) launched a modernized FAC-C framework which included a refreshed contracting competency model, a single-level certification requirement, and the introduction of credentials.

This GSA's previous Contracting Officer Warrant Program aligned warrant levels to the old three level FAC-C program. With OFPP's move to a single level certification, GSA is updating its warrant program requirements.

GSA has also created a Contracting Officer Warrant Board (COWB) page on the Acquisition Portal, to assist GSA contracting activities with establishing their warrant boards.

3. Effective date. January 1, 2024
4. Explanation of changes. This amendment includes non-regulatory changes. For full text changes of the amendment see Attachment A, GSAM Text Line-In/Line-Out.

This amendment revises the language of the following GSAM subparts:

- 501.6 (Career Development, Contracting Authority, and Responsibilities)
  - 501.601 General
    - Updated definition of Contracting Officer Warrant Board (COWB) to replace the term "employee" with "professional" and delete "nomination" from a task of COWB.
    - Updated definition of Contracting Officer Warrant Program (COWP) to add text to state this is a standardized process which establishes criteria for qualifying, appointing and terminating warrants of GSA contracting officers.
    - Deleted the last sentence of the definition which stated the value of COWP as part of the definition.
  - 501.603-1 (General)



- Revised (a)(2)(iv):
  - Added “Other Designee” as the subsection title for consistency.
  - Provided guidance language that allows contracting activities to appoint acquisition or non-acquisition personnel to the COWB.
  
- Added (a)(2)(v):
  - Added “*Limitation to Members*” as the subsection title for consistency.
  - Provided guidance language to indicate that COWB members shall not serve in multiple roles.
  
- Revised (b):
  - Updated guidance to require nominations for appointment to be submitted by the candidates supervisor
  - Replaced “Acquisition Career Management Point of Contact: with “ACN” to align with the contracting officials in 501.601(b).
  
- Added new subparagraph (c) “Required documentation for warrant package submission” which includes:
  - Guidance on the required documentation that must be submitted with a warrant package submission.
  - Instruction to complete and submit documents to the Administrative Warrant Issuing Agent.
  - Guidance on including GSA Form 3409, GSA Form 3410 and Redacted unofficial college transcripts with the warrant package submission.
  
- Replaced existing section (c) with section (d) which includes:
  - Guidance on the transferability of GSA warrants across the agency and the requirement to conduct a new COWB.
  
- Replaced existing section (c)(1) with (d)(1) Experience requirements which includes:
  - Guidance on the requirement for the COWB to construct a rigorous review process at all warrant levels to verify contracting experience as defined 501.603-1(a).
  - Provided examples of various methodologies that can be used in the rigorous review process to include any

combination of quality reviews of past contracts or lease actions, interviews, written, or oral testing.

- Replaced existing section (c)(2) with new section (d)(2) Training Requirements to replace “applicants” with “candidates” to ensure consistency in the use of the terminology throughout the section.
- Replaced existing section (c)(3) with new section (d)(3) “Educational requirements” to provide guidance on the educational requirements for the applicable warrant type as a condition of being issued the warrant.
- Added new section (d)(4) “*Credential requirements*” which includes:
  - Guidance on Government-wide credentials being available via Federal Acquisition Institute Cornerstone on Demand or Defense Acquisition University iCatalog.
  - Guidance on GSA-specific credentials for professional or job-related needs as determined by the HCA and warrant candidate’s supervisor.
  - Guidance on GSA’s IT Acquisition Credential (ITAC) being an acceptable alternative to the FAC-C-DS for contracting professionals involved in digital services.
- Added new section (d)(5) “*Senior Unlimited Acquisition Warrants*” which includes:
  - Guidance on a requirement effective **October 1, 2025** for senior unlimited acquisition warrant candidates to possess certain qualifications.
  - Guidance for senior unlimited acquisition warrant candidates to possess one of the following:
    - Previously held a senior unlimited acquisition warrant within GSA or another Federal agency
    - Previously completed all training required for the legacy FAC-C Level III program or
    - Be FAC-C Professional certified and possess at least two credentials related to the work to be executed under the new warrant authority.
- Added new section (d)(5)(ii) “Exceptions” which includes:
  - Guidance on the HCA granting an exception to the requirement to hold two (2) credentials for senior

unlimited acquisition warrant candidates if a plan and timeline to meet the requirement is established.

- Added new section (d)(5)(iii) “Non-Compliance with Conditional Exception” to provide guidance on the suspension or termination of warrants for failure to complete and obtain the required credentials.
- Added new section (d)(5)(iv) “Exemptions” to provide guidance on non-acquisition warrants being exempt from the requirement to obtain two (2) credentials. This requirement does not apply to warrants issued to make purchases for domestic and national security emergencies.
- Added new section (d)(6) “*Additional Guidance on Warrants Requirements*” to provide the location on the GSA Acquisition Portal for the additional guidance.

5. Point of contact. For clarification of content, contact the GSA Acquisition Policy Division at [gsarpolicy@gsa.gov](mailto:gsarpolicy@gsa.gov).

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**GSAM Case 2023-G505**  
**GSAM Text, Line-In/Line-Out**

**GSAM Baseline: Change 171 effective 10/12/2023**

- Additions to baseline made by rule are indicated by **[bold text in brackets]**
- Deletions to baseline made by rule are indicated by ~~strikethroughs~~
- Five asterisks (\* \* \* \* \*) indicate that there are no revisions between the preceding and following sections
- Three asterisks (\* \* \*) indicate that there are no revisions between the material shown within a subsection

Part 501 - General Services Administration Acquisition Regulation System

Subpart 501.6 - Career Development, Contracting Authority, and Responsibilities

**501.601 General.**

(a) Definitions.

\* \* \*

“Contracting Officer Warrant Board (COWB)” means a group of senior-level acquisition **[professionals]**~~employees~~ within a contracting activity who receive, evaluate, and process warrant requests for selection ~~and nomination~~ of contracting officers at the basic, simplified, intermediate, and senior levels.

“Contracting Officer Warrant Program (COWP)” **[means the standardized process which]** establishes the criteria for **[qualifying]**, ~~appointment~~**[appointing]** and **[terminating warrants]** of GSA contracting officers **[based on an organization’s needs for contracting authority]**. ~~This ensures that GSA follows a standardized process for qualifying and appointing individuals as contracting officers based on the organization’s needs for contracting authority.~~

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\* \* \* \* \*

**501.603 Selection, appointment, and termination of appointment for contracting officers.**

**501.603-1 General.**

(a) *Definitions.* \* \* \*

(b) *Certifications.* \* \* \*

**[(c) Contracting Officer Warrant Board Procedures.**

**(1) GSA contracting and leasing activities shall structure their COWB procedures in a manner that is consistent with 501.603-2.**

**(2) Guidance for preparation of written COWB procedures is provided on the GSA Acquisition Career Management page on the GSA Acquisition Portal at <https://insite.gsa.gov/acquisitionportal>.**

**(3) Service-level policy organizations (e.g., FAS's Office of Policy and Compliance, PBS's Office of Acquisition Management, PBS Office of Leasing, and Office of Internal Acquisition (OIA's) Acquisition Policy and Workforce Division) have the discretion to conduct additional reviews prior to warrant package submission to the Administrative Warrant Issuing Agent.]**

~~(e)~~ **[d] Contracting Officer Warrant Program (COWP).** GSA's COWP is administered by the Office of Acquisition Policy.

(1) *Factors in determination of need for warranted contracting officers*\* \* \*

(2) *Training, education and experience* \* \* \*

(3) *Responsibilities.*\* \* \*

(i) GSA's SPE:\* \* \*

(ii) HCAs: \* \* \*

**[(I) Certify that the candidate, based upon satisfaction of the warrant**

**requirements, supervisor recommendation, and concurrence of the COWB, is eligible for a specific level of warrant.]**

~~(H) [(J)]~~ Appoint contracting officers. The HCA may further limit warrant authorities at each warrant level.

~~(J) [(K)]~~ May establish additional requirements beyond the minimum standards for training, education, experience and certifications prior to issuing a warrant.

~~(K) [(L)]~~ Retain acquisition career management responsibilities for warrants, based on the contracting officer's organizational assignment.

(iii) ACM:\*\*\*

(4) *Applicability*.\*\*\*

(5) *Warrant levels*.\*\*\*

~~(d) *Change order authority*. Contracting officers may authorize COR change order authority in accordance with the limitations in GSAM [543.202](#), Authority to issue change orders.~~

~~(e)[d] [**Contract administration office.**] If [T]he HCA, determines that the considerations listed under per GSAM [542.302](#)(c) warrant the establishment of [**may establish**] a contract administration office. [**A**] contracting officer with an unlimited warrant may authorize contract administrative functions in accordance with GSAM [542.302](#)(d).~~

## **501.603-2 Selection.**

(a) *Contracting Officer Warrant Board (COWB).*

(1) The COWB ensures that all of the applicable criteria have been met prior to granting any GSA contracting officer warrant.

(2) Composition of the COWB. The HCA appoints the Board members and the Chair. **[The COWB shall include, at a minimum, the following three voting members: COWB Chair, Supervisor and Senior Procurement Professional. Unanimous approval from Board members is required for the candidate to obtain a warrant.]**

(i) COWB Chair. The COWB Chair **[(e.g., Contracting Executive or Contracting Director, or Acquisition Career Navigator (ACN))]** evaluates the



~~contracting officer candidate's credentials prior to submission to the COWB.~~**[the business need for the candidate to hold a warrant (e.g., workload), the appropriate level (e.g., dollar threshold, scope of goods/services), and participates on the COWB to further evaluate the candidate's competency to hold the requested warrant.]**

(ii) ~~Senior leadership representing each type of warrant issued by the contracting activity~~**[Supervisor. The candidate's immediate supervisor or the individual acting in the role shall serve as a voting member of the COWB.]**

(iii) ~~Other specialized representation, such as legal counsel assistance (as requested)~~**[Senior Procurement Professional. The Senior Procurement Professional shall be a senior contracting officer, procurement policy analyst or subject matter expert with knowledge and experience to evaluate the candidate's competency to hold the requested warrant.]**

(iv) ~~Any other designee with knowledge and experience in the warrant procedures.~~**[Other Designee. The contracting activity may designate additional acquisition personnel or non-acquisition personnel as appropriate].**

**[(v) Limitation to Members. The same individual cannot serve in multiple roles (e.g., serve as COWB Chair and Supervisor.)**

(b) *Nominations for appointment.* ~~Nominations for appointment are submitted by~~**[T]the candidate's supervisor of record [will submit the nominations for appointment]** to the designated Acquisition Career Management Point of Contact **[ACN]**. The designated Acquisition Career Management Point of Contact **[ACN]** must coordinate with the candidate and COWB to facilitate approval by the HCA.

**[(c) Required documentation for warrant package submission. Incomplete warrant submission packages will be returned without processing. All the following documents must be completed and submitted to the Administrative Warrant Issuing Agent (see 501.601) in accordance with warrant information provided on the Acquisition Portal:**

**(1) GSA Form 3409, Personal Qualifications Statement for Appointment as Contracting Officer. A current resume may be used to supplement the GSA Form 3409 but cannot be used in lieu of this document.**

**(2) GSA Form 3410, Request for Review, Approval & Appointment. The GSA**

**Form 3410 shall be used to document the COWB concurrences and HCA approval.**

**(3) College transcripts. Redacted unofficial college transcripts are acceptable.]**

**([d]e) *Evaluation of candidates for contracting officer warrants.* [All GSA warrants are valid across the agency and may be transferred pursuant to the organization's delegated procurement authority. The supervisor may, but is not required to, conduct a new COWB.]**

**(1) *Experience requirements.* The COWB must [conduct a rigorous review process which may consist of any combination of quality reviews of past contracts or lease actions, interviews, written and/or oral testing to assess and document the level of expertise] consider the candidate's relevant experience in determining the candidate's capability to assume contracting officer responsibilities at the desired level. The COWB must consider the quality of past contracts and leases as it pertains to the review of contract files for conformity to policy, quality of documentation and appropriate contracting action and the results of any independent review conducted by the contracting activity [for all candidates] to verify the nominee's contracting experience as defined in [501.603-1\(a\)](#) [.] at the intermediate and senior level. [This review shall be conducted at all warrant levels, for all warrant types.]**

**(2) *Training requirements.* Warrant [candidates] applicants must complete specific training for the applicable warrant type as a condition of being issued that warrant as identified on the Acquisition Career Management pages on the GSA Acquisition Portal at <https://insite.gsa.gov/acquisitionportal>.**

**(3) *Educational requirements.* [Warrant candidates must complete specific educational requirements for the applicable warrant type as a condition of being issued that warrant as identified on the Acquisition Career Management pages on the GSA Acquisition Portal at <https://insite.gsa.gov/acquisitionportal>.] Employees who were warranted prior to January 1, 2000, are considered to have met the educational standard for their existing warrant; however, warrant increases or new warrant applications are subject to applicable warrant requirements.**

**[(4) *Credential requirements.* Candidates for warrants may be required to obtain Government-wide credentials through a recognized acquisition training curriculum (e.g., the Federal Acquisition Institute Cornerstone on Demand or Defense Acquisition University iCatalog) or GSA-specific credentials for**

professional or job-related business needs, as determined by the HCA and the candidate's supervisor.

(i) OMB requires contracting professionals involved in digital services acquisitions to obtain Federal Acquisition Certification in Contracting Core-Plus Specialization in Digital Services (FAC-C-DS) (See [OFPP Memo dated May, 18 2018](#)). GSA's IT Acquisition Credential (ITAC) is an acceptable alternative to FAC-C-DS (See <https://insite.gsa.gov/itac> )

(ii) Additional information on Government-wide and GSA-specific credentials can be found on the GSA Acquisition Career Management page on the Acquisition Portal at <https://insite.gsa.gov/acquisitionportal>.

**(5) Senior Unlimited Acquisition Warrants.**

(i) **Qualifications.** Effective October 1, 2025, new candidates for senior unlimited acquisition warrants, must possess one of the following:

(A) Previously held a senior unlimited acquisition warrant within GSA or at another Federal agency;

(B) Previously completed all the training required by the legacy FAC-C Level III program; or

(C) Be FAC-C Professional certified and possess at least two credentials related to the work to be executed under the new warrant authority.

(ii) **Exceptions.** The HCA may grant an exception to the requirement to hold two credentials provided a plan and timeline to meet the requirement is established.

(iii) **Non-Compliance with Conditional Exception.** Failure of candidates for senior unlimited acquisition warrants to successfully complete and obtain credentials as outlined in any conditional exception may result in suspension or termination of the warrant.

(iv) **Exemptions.** Candidates for senior unlimited non-acquisition warrants (i.e., leasing, real property disposal, personal property disposal, and fleet sales) are exempt from the requirement to obtain two credentials. This requirement does not apply to warrants issued to make purchases for domestic and national security emergencies under 501.603-3(d). All other requirements (e.g., certification, training, experience, and education) must be satisfied before a warrant can be issued.

**(6) *Additional Guidance on Warrant Requirements.*** Additional guidance on warrant requirements is provided on the GSA Acquisition Career Management page on the GSA Acquisition Portal at <https://insite.gsa.gov/acquisitionportal>.]