

CENTRAL CONTRACTOR REGISTRATION

The Central Contractor Registration (CCR) is a database of contractor information that enables contractors to receive payment by Electronic Fund Transfer (EFT) and increases contractor visibility to potential government buyers. By collecting information from each contractor, the CCR provides a central database that records, validates and distributes specific data about contractors to government buyers. While the CCR process will soon be the standard government wide, the Department of Defense (DOD) is the first agency to implement the CCR process across all buying and paying activities.

The DOD developed the CCR to support the President's Executive Memorandum entitled "Streamlining Procurement through Electronic Commerce", dated October 13, 1994 and to comply with the Debt Collection Improvement Act of 1996 which requires contractors doing business with government to furnish its taxpayer identification number and EFT information.

In the DOD, CCR is not an option. Defense Federal Acquisition Regulation Supplement (DFARS) Subparts 204.73, 212.5, 232.11, 252.204, and 252.232 now require contractor registration in the CCR prior to the award of a contract, basic agreement, basic ordering agreement, or blanket purchasing agreement resulting from a solicitation issued after May 31, 1998. The policy applies to all types of awards except:

- a. Purchases made with Government wide commercial purchase cards.
- b. Awards to foreign vendors for work performed outside the United States.
- c. Classified contracts or purchases.
- d. Deployment, contingency, emergency operations.
- e. Purchases in support of unusual or compelling needs.

As a general rule, contracting officers are prohibited from awarding to a contractor that is not registered. Prior to making an award, the contracting officer must verify that the contractor is registered in the CCR database. The offeror is required to provide its Data Universal Numbering System (DUNS) or DUNS+4 number, which the contracting officer will use to verify registration. The contractor is required to complete all mandatory information to become registered in the CCR database and is responsible for the accuracy and completeness of the data within the CCR and for any liability resulting from Government reliance on inaccurate or incomplete information. Therefore, if the contractor is not paid as a result of his failure to accurately or completely submit CCR information, the contractor will have no claims for interest for failing to receive prompt payment.

If the contracting officer determines that the contractor is not registered, she may:

- a. delay the award (if the needs of requiring activity allow) until after the contractor is registered, or
- b. if the needs of requiring activity do not allow for a delay, award to the next otherwise successful registered offeror. (Requires written approval one level above contracting officer).

DOD has established a goal of registering an applicant in the CCR database within 48 hours after receipt of a complete and accurate application via the internet and within 30 days for other methods.

Potential problems exist when an unregistered offeror is selected for contract award. The contracting officer may want to delay the award in order for the potential awardee to become registered. However, if the contractor submits or has submitted a complete and accurate application and registration takes significantly longer than 48 hours, the requiring activity may be unable to delay and may push for award to the next otherwise successful

registered offeror. If that happens, the first offeror will cry foul because they would have received the award but for government delay in processing their CCR. I am not aware of any protests involving this issue.

To avoid that problem, ensure that DFARS clause at Subpart 252.204-7004, Required Central Contractor Registration, is included in all solicitations. Thus, by submission of an offer, the offeror acknowledges the requirement that a prospective awardee be registered in the CCR database prior to award, during performance and through final payment of any contract resulting from the solicitation. The offeror also acknowledges that failure to register will make an offeror ineligible for award.

The Director of Defense Procurement, Eleanor R. Spector, in a memorandum dated May 21, 1998 urged the military services and defense agencies to ensure that contracting personnel are aware of the CCR requirement. To that end, the IOC has conducted CCR training for its contracting personnel to ensure compliance with the DFARS as well as promote contractor registration.

Information on CCR may be obtained at **HYPERLINK** <http://www.ccr.edi.disa.mil> or 1-888-227-2423. The web site also provides assistance with completing the registration.

Questions on CCR may be addressed to IOC CPT Marc A. Howze by telephone at DSN 793-8111 or email at howzem@ioc.army.mil.