UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
OFFICE OF THE CHIEF ADMINISTRATIVE OFFICER
Real Property Management Division

REAL PROPERTY MANAGEMENT DIVISION
BULLETIN # 29 Revised
July 1, 2013

Subject: Actions Required After Executing an Agreement or a Modification
- Communication Flow to Office of Finance
- Financial and Inventory Data Entry Forms
- Division's Virtual File Room

Category: Financial Controls and Data Accuracy

This Bulletin replaces the previous version of Bulletin #29, issued on May 1, 2010.

PURPOSE

This Bulletin details the management controls the Real Property Management Division (RPMD) has instituted to promote the segregation of duties to verify and process real property financial and inventory information to the Office of Finance (Finance) and to the Division's *Virtual File Room.*

OVERVIEW

- Included in this bulletin is guidance on:
    - how the Office of Finance will be informed of real property agreements or modifications;
    - completion of data entry forms;
    - documentation required for the Virtual File Room; and,
    - naming conventions for documents posted to the virtual file room.

- The Virtual File Room (VFR) is accessible with a NOAA email address along with RPMD's permission. The VFR is intended to house documents most used by the NOAA community, including source documents for Finance.

- All realty specialists will complete relevant *data entry forms* and provide source documentation for real property agreements or modifications to a facility support assistance (FSA). Realty specialists are accountable for data accuracy.

- Prior to processing any financial information to Finance, a FSA will review for accuracy the data entry forms against the source document submitted by the realty specialists.

- Only a FSA may post documents to the Virtual File Room (VFR).

- Realty specialists may contact Finance to set up a vendor, review payment histories, or research lease related information. However, ALL instructions regarding payments, changes in funding codes, or Lessor information may only be issued by a FSA.

GUIDANCE

Processing an Action and Communication with the Office of Finance

Once a realty specialist has executed a real property agreement or modification, he/she will complete the appropriate data entry form for the type of action being completed and e-mail the data entry form along with the required documentation to the FSA e-mail (rpmd-fsa@noaa.gov) without copying the Office of Finance. The Contracting Officer (CO) is responsible for reviewing and approving all data entry forms prior to their submission to the FSAs. COs shall indicate their approval by initialing the data entry form. (The most current versions of the data entry forms will be available via the VFR.)

For actions requiring a payment, the realty specialist will complete the Finance Lease Data Sheet (FLDS) and the FRPM Journal Voucher form. Prior to that step, the realty specialist will have work with Finance to obtain any necessary vendor ID number and to ensure Finance has the necessary information to establish the Lessor as a vendor within CBS.

Upon receipt of the email message, the FSAs will enter the action into the FSA Data Entry Log. Realty specialists are required to periodically check the log to ensure their actions are recorded and being processed. The FSAs will review the data entry forms and attached documentation for accuracy and completeness. For cost leases, once the forms and documentation have been accepted as complete and accurate a FSA will forward the Finance Lease Data Sheet (FLDS) and any required supporting documentation to the Office of Finance. Only the FSAs may issue instructions to Finance regarding payments (initiating, stopping, or changing the amount), funding codes, or Lessor information.

For all actions, a FSA will enter the appropriate information into real property inventory system and upload the data entry form along with the supporting documentation to the Virtual File Room.

Attachment 1 contains a process flow chart detailing the steps to be taken once a real property action is completed.

Virtual File Room (VFR) Structure

The VFR is divided into five principal sections: 1) NOAA Controlled; 2) GSA Assignments; 3) VFR Archive; 4) RPMD Reports; and 5) RPMD Forms.

NOAA Controlled

The NOAA Controlled section includes all real property that is not occupied by NOAA under an Occupancy Agreement with the General Services Administration (GSA). This includes NOAA-owned real property and real property acquired through a lease contract or other form of agreement. The properties are categorized by state. Within each state folder there are sub-folders for each complex (either multi- or single-property) in that state. Each sub-folder is named with the state, then city, then complex #. An example is AL Mobile DAL0310.

Within each complex there is an "Owned" folder and/or a "Lease or Other Agreements" folder depending on whether the complex includes owned or leased properties or both. If a complex includes multiple owned properties then the Owned folder will contain a folder for each owned-property using the property ID number. If a complex has more than one lease (or agreement) then the Lease or Other Agreements folder will contain multiple lease/agreement folders with the different lease numbers.

GSA Assignments

The GSA Assignment section includes all complexes that are GSA-owned or GSA-leased. The properties are categorized by state. Within each State folder there are folders for every GSA building that NOAA occupies with each folder named with the city, then state, then building (property) ID. An example would be "Anchorage AK AK0001ZZ." If there is a building with multiple Occupancy Agreements (OA), within the building folder there will be one subfolder for each OA.

VFR Archive

The VFR Archive folder contains NOAA Controlled and GSA Assignments subfolders. Within each subfolder there are State subfolders. When real property leaves at the complex level leaves the inventory the associated folder(s), including subfolders for that complex will be moved by a FSA from the main section of the VFR into the VFR Archive folder. Complexes will only be moved to the VFR Archive folder once they have been archived in FRPM. When archiving, the complex folder will be renamed to include the date that the property left the inventory. (If there is a quitclaim deed it will be the date the deed was executed not the date the quitclaim was recorded.) The folder name should be the state, city, complex #, and then the calendar year NOAA vacated/terminated the lease/excessed the property, whichever is later.

RPMD Reports

This folder contains the most recent RPMD Completed Actions Report and RPMD Workload and Project Tracker Report. Other reports will be developed over time.

RPMD Forms
This folder contains the current data entry forms that shall be used when reporting on real property actions to the Facility Support Assistants.

Note: The VFR does NOT replace the hard copy files contained in RPMD's file rooms. Documentation required in the hard copy file has not changed. Hard copy files will continue to contain procurement, environmental, contract and other related information as well as the source documents that are posted to the VFR. .

Attachment 2 contains a diagram of the overall structure of the Virtual File Room.
Attachment 3 contains a detailed guidance on what should be included in the VFR.
Attachment 4 contains guidance on the documentation required for each real property action.

Naming Conventions

In order to ensure standardization, realty specialists and facility support assistants will use the naming conventions contained in Attachment 5 and 6. Any letter "I" used in the lease or property ID number should be lower case, as in "i." for ease in viewing (i.e. to assist in distinguishing between "I's" "L's" and "1's." (Note: In FRPM the "i" will still appear as "I" because of the system's font.) Indicate abbreviations and states with capital letters. Dates should follow the format "mm-dd-yyyy". City must be the city where the property is physically located. If the property is not physically located in a city then it should be the city that is associated with the zip code of the property. Do NOT use the Lessor's address or zip code. Each component of the file name should be formatted in the order listed and separated by a space.

Attachment 5 contains guidance on naming and saving files/documents that will be uploaded to the VFR.
Attachment 6 provides a quick summary of the naming conventions.

Sensitive Personally Identifiable Information and Uploading Documents to the VFR

Documents uploaded to the VFR **MUST NOT** contain any Social Security Numbers, Taxpayer Identification Numbers or any other Sensitive Personally Identifiable Information (Sensitive PII).

Realty Specialists must physically black out any Social Security Number, Taxpayer Identification Number, bank account numbers, or other Sensitive PII information from any lease, Finance Lease Data Sheet (FLDS) or other document PRIOR to scanning. The only acceptable electronic means of covering or deleting Sensitive PII is to electronically cover the PII using

Adobe Acrobat tools AND then to PRINT the document to a PDF file. It is not acceptable (secure) to save a file with an Adobe Acrobat rectangle placed over PII, even if the file is password protected.

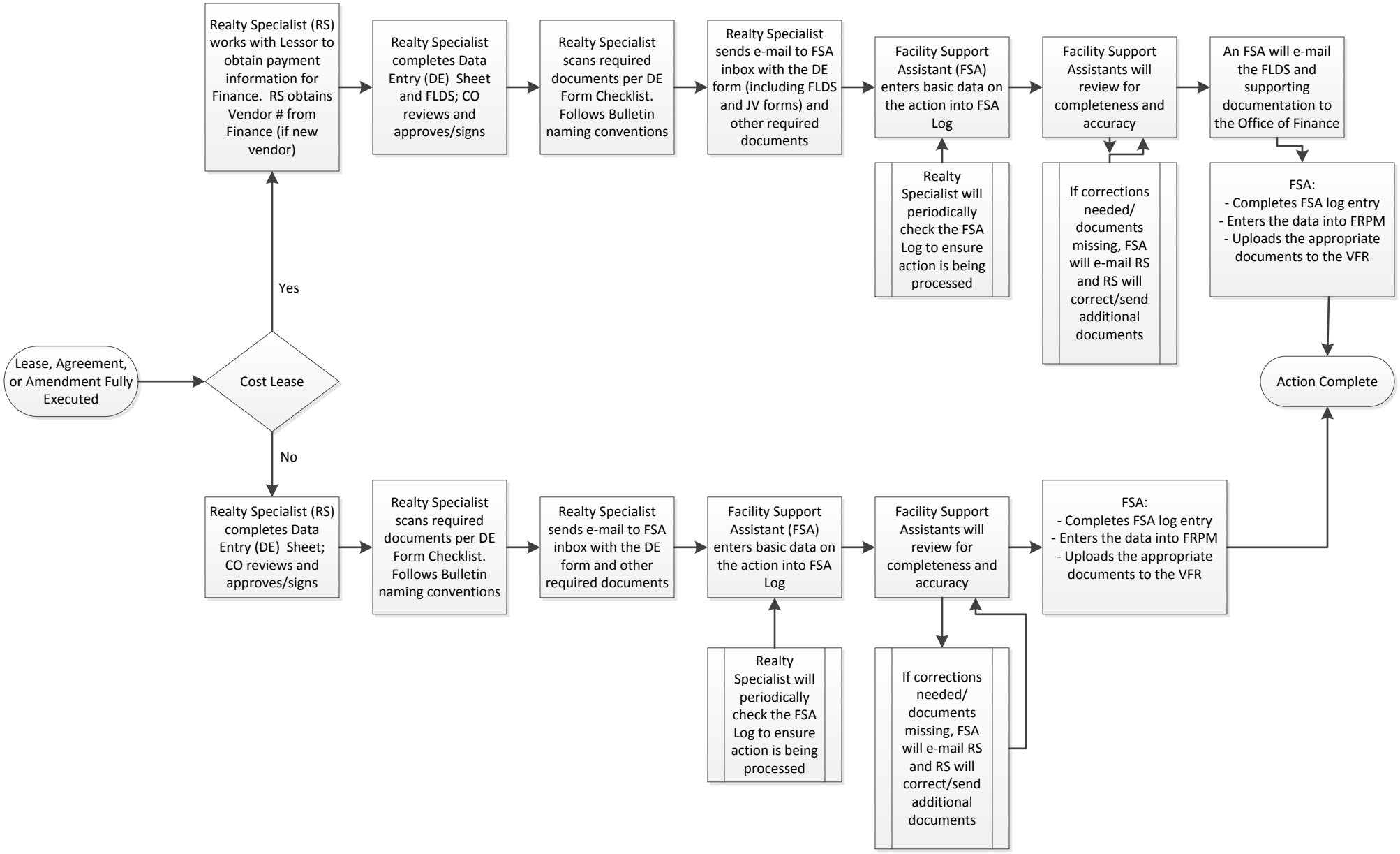
Many companies provide Employer Identification Numbers or (EINs) in place of a TIN. If a realty specialist is certain that the EIN/TIN does NOT represent a Social Security Number or a taxpayer number associated with only one individual it may be transmitted electronically over e-mail but should NOT be included in any documents that will be uploaded to the VFR. The same instructions for blacking out SSNs should be followed for TINs and EINs. It is the responsibility of the person transmitting the document to ensure it does not contain Sensitive PII. Contact your supervisor if you have reviewed Attachment 7 and have a question about whether something is sensitive PII. RPMD is required to report breaches of DOC/NOAA's privacy policy to the Commerce Incident Response Team. Repeated violations can result in loss of e-mail privileges.

Attachment 7 contains guidance on securing PII information from the DOC/NOAA web-sites .

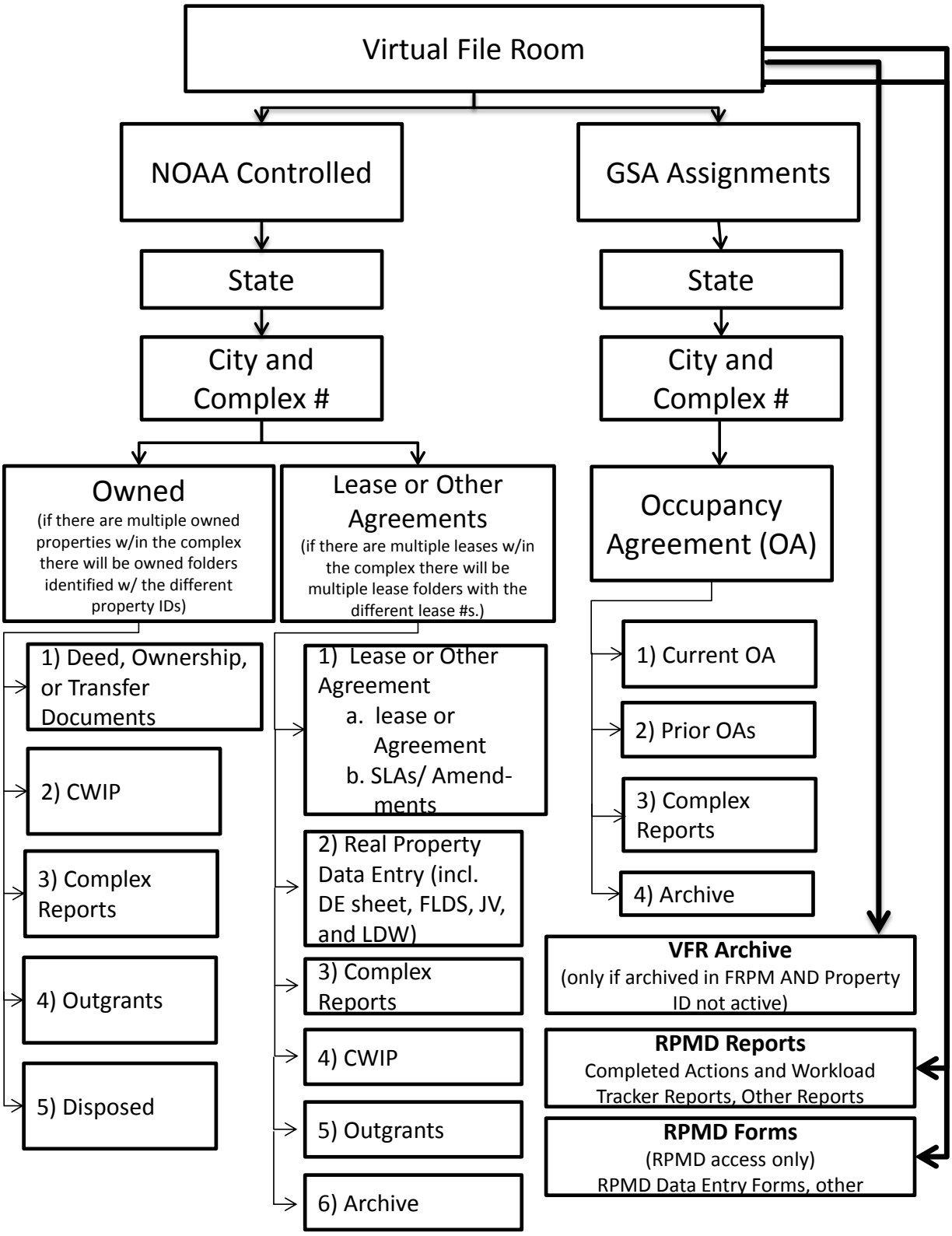
Attachments:

1) Process Flow Following Execution of a Real Property Action
2) Virtual File Room Structure Diagram
3) VFR Folder Structure and Content
4) Required Documentation by Action
5) Naming Convention Detail
6) Naming Convention Quick Summary
7) Sensitive PII Information

Bulletin #29 Attachment 1
Completed Action Process Flow



Bulletin #29 Attachment 2 – Virtual File Room Structure



Bulletin #29 Attachment 3 - VFR Folder Structure and Content

The VFR is divided into five principal sections/folders: NOAA Controlled; GSA Assignments; VFR Archive, RPMD Reports, and RPMD Forms.

NOAA Controlled - Lease or Other Agreement

The NOAA Controlled section of the VFR is divided into two main sections: Lease or Other Agreement; and, Owned. Within each Lease or Other Agreement folder, there are six subfolders as numbered below. All documents should be in PDF format.

1. **Lease or Other Agreement Folder**
    a. Lease or Other Agreement sub folder. This includes the original executed lease, permit, license, or other agreement. Leases will be scanned as one document. The scanned lease will include the following, if part of the lease, in this order:
        i. SF-2
        ii. Riders, exhibits or any other contract-related forms initialed as part of the lease (that are not listed below). If drawings are part of the lease itself and are too large to be scanned then one page should be scanned that states the following in place of the drawings " "See hard copy Lease File for drawings that are part of the Lease"
        iii. Request for Lease Proposal (RLP) or Solicitation for Offers (SFO)
        iv. Form 3517, General Clauses (or the relevant version of the 3517)
        v. Form 3518, Representations and Certifications (or the relevant version of the 3518)
        vi. Form 1217, Lessor's annual cost statement

    Permits, licenses and other contractual forms will be scanned in their entirety as one document.

    b. SLAs/Amendments subfolder. This subfolder includes all Supplemental Lease Agreements/Amendments to contracts. This folder shall also contain any letter or other document, even if not a formal SLA or Amendment, which changes the terms of the lease or agreement. Examples include exercising a renewal or other option, changes payments, changes the term of the lease, and/or details additional improvements. Termination and expiration documentation (including confirmation of equipment removal and any correspondence with the Lessor regarding the termination) should be placed in this folder.

2. **Real Property Data Entry Folder**
    a. Data entry form completed by Realty Specialist including the Finance Lease Data Sheet (FLDS). If there is an FRPM Journal Voucher Worksheet for the lease it will

be included as well. Data entry sheets for SLAs/Amendments and any real property actions will be included here.

b. Lease Determination Worksheet (if one was completed for the lease/agreement action). The entire executed Lease Determination Worksheet should be contained within this folder.
c. Form CD-435 must be included for capital leases.
d. RPMD internal correspondence or e-mails if they pertain to the lease/agreement and its administration (i.e. costs, term, improvements, etc.). Only e-mails that directly affect the administration of the lease/agreement should be included in the VFR. Other e-mails should be retained in the lease file but not uploaded to the VFR.
e. For a lease termination/expiration if there is an environmental report done the executive summary should be placed in this folder.

3. Complex Report Folder

Screenshots from FRPM that include all of the following combined into one document. This will be created by a FSA.

i. Complex screen
ii. Property screen
iii. Diary screen
iv. Lease screen
v. Allocation screen (this could include two or more allocation screens if there are multiple properties).
vi. Journal voucher screen, if applicable.
vii. Depreciation record, if applicable.
viii. Outgrant screen, if applicable

4. CWIP Folder

a. Determination Memorandum (scanned and uploaded by the RPMD Financial Management Analyst).
b. Beneficial Occupancy Date Memorandum (scanned and uploaded by the RPMD Financial Management Analyst)
c. Form 37-6, including any revised forms 37-6 (uploaded by a FSA)
d. Form 37-6 excel spreadsheet/cost breakdown worksheet (uploaded by a FSA), if applicable.
e. FSA-completed data entry form

5. Outgrants

a. Outgrant agreement
b. Outgrant data entry form
c. Any other significant outgrant- related form, such as an MOU, etc.

6. **Archive (property still active)**

This folder contains any folders and files for a property that is still active (i.e. has an active Property ID) but where the lease/other agreement has been replaced with a new lease/agreement. For example, if a lease for a property expires and a succeeding lease is executed. Once the succeeding lease is executed the folders and files associated with the original lease should be moved to the Archive folder within the succeeding Lease file. If a lease expires and NOAA leaves the property entirely, i.e. the Property and Complex ID is no longer active, than an FSA shall move the entire folder into the VFR Archive folder, where archived complexes will be listed by State and then City and Complex #. The complex folder should only be moved to the VFR ARCHIVE folder once the complex has been archived in FRPM. This is especially important for capitalized leases, disposed of owned property, and operating leases over $200,000 total contract value – these shall only be moved to the VFR Archive folder once the property has been archived in FRPM (which usually occurs only in mid-October, after the end of the Fiscal Year).

NOAA Controlled - Owned

Within each Owned Property folder there are five subfolders as numbered below. All documents within the folders should be in PDF format.

1. Deed, Ownership, or Transfer Documents Folder

These documents will depend on the property. Consult the FSAs on what should be included in this folder. Generally any document granting/transferring ownership to NOAA should be placed here.

2. CWIP Folder

a. Determination Memorandum (scanned and uploaded by the RPMD Financial Management Analyst).
b. Beneficial Occupancy Date Memorandum (scanned and uploaded by the RPMD Financial Management Analyst)
c. Form 37-6, including any revised forms 37-6 (uploaded by a FSA)
d. Form 37-6 excel spreadsheet/cost breakdown worksheet (uploaded by a FSA), if applicable and provided by PPMD.
e. FSA-completed data entry form

3. Complex Reports

Screenshots from FRPM that include all of the following combined into one document. This is created by an FSA. In addition, any internal correspondence or other documentation that affects the conditions/terms of ownership should be placed in this folder.

i. Complex screen
ii. Property screen

iii. Diary screen
iv. Allocation screen
v. Depreciation record, if applicable
vi. Outgrant screen, if applicable

4. Outgrants

a. Outgrant agreement
b. Outgrant data entry form
c. Any other significant outgrant- related form, such as an MOU, etc

5. Disposed Properties

The Realty Specialist will work with their supervisor and the FSAs to ensure adequate documentation is placed in the VFR. The below is a list of the minimum required documentation for different types of dispositions.

Disposed/Excessed Properties

a. Documentation from the primary NOAA occupant (line or staff office) regarding its desire to dispose or excess of the property. (A signature of the primary occupant on the SF-118 may substitute.)
b. The GSA SF-118 Report of Excess Real Property completed form and its attachments including the Disposal Determination, the Excess Real Property Checklist, and the GSA Inspection report.
c. The NOAA Letter to GSA covering the Disposal Package.
d. The Chief Executive Officer signed Memorandum approving of the Disposal.
e. The GSA Acceptance of Report of Excess Letter.
f. The executive summary of any environmental survey or documentation, if applicable.
g. Quit claim deed, transfer document, or other instrument, as applicable
h. The Data Entry Form.

Transferred Properties

a. Documentation from the primary NOAA occupant (line or staff office) regarding its desire to transfer the property. (A signature of the primary occupant on GSA Form 1334 may substitute.)
b. The GSA Form 1334.
c. Any letters to GSA including any regarding no cost transfer exceptions.
d. The GSA SF-118 Report of Excess Real Property completed form and its attachments including the Disposal Determination, the Excess Real Property Checklist, and the GSA Inspection report.
e. GSA Letter of Acceptance
f. Any letters or memorandum to OMB and any Letters of Notification to Congress.

g. The executive summary of any environmental survey or documentation if applicable.
h. Quit claim deed, transfer document, or other instrument, as applicable
i. The Data Entry Form.

GSA Assignments

Each GSA-Assignment folder contains the following subfolders (All documents should be in PDF format). The RPMD Rent Bill Manager will upload the documents to the appropriate folder. Realty Specialists will ensure that the RPMD Rent Program Manager has the necessary documents.

1. Current Occupancy Agreement (abbreviated Current OA)

This includes the most current Occupancy Agreement (OA) that NOAA has received from GSA. In cases where GSA executes a unilateral OA, normally for administrative changes like CPI adjustments, there may be a significant lag before NOAA receives the OA. All OAs will be scanned as one document. Pro Forma OAs will be scanned and uploaded once fully executed by GSA and NOAA. The scanned Pro Forma OA will include the following documents, in this order:

i. Pro-forma Occupancy Agreement
ii. RPMD Delegated Official signature (this would normally be on the OA signature page, if RPMD's and GSA's signature are on the same page then only one page need be scanned to satisfy ii. and iii.)
iii. Fully-executed signature page of the OA (both GSA and NOAA)
iv. OA Financial Summary pages
v. Tenant Line/Staff Office concurrence signature (this is normally the tenant Line/Staff Office(s) signatures on the OA signature page that RPMD requires prior to RPMD signing the OA).
vi. NOAA Rent Funds Certification Form (new form) – not currently available.

Final Occupancy Agreements will be scanned as one document once the rent bills are generated by GSA. Scanned Final OAs will include the following documents, in this order:

i. Final Occupancy Agreement
ii. OA Financial Summary pages
iii. Copy of Rent Bill from Rent on the Web (ROW) to document rent commencement

Administrative Occupancy Agreements, which reflect operating cost adjustments, real estate taxes, re-measurement of space, etc. will be scanned and include the following:

i. Administrative Occupancy Agreement
ii. Financial Summary pages

2. Prior Occupancy Agreements (abbreviated Prior OAs)

Once an OA has been replaced by a new version, the older OA will be placed in the Prior OAs folder.

3. Complex Reports

Screenshots from FRPM that include all of the following combined into one document:

i. Complex screen
ii. Property screen
iii. Lease screen
iv. Journal voucher screen, if applicable.

4. Archive (property still active)

If an OA expires or is replaced by a new OA with a new OA number (not just a new version of the same OA number) but NOAA still occupies the property all old OA folders will be placed in this Archive within the folder with the new OA number. If NOAA permanently vacates the GSA-owned or leased property, the entire OA folder (including the sub-folders) should be moved to the VFR Archive folder.

Bulletin #29 Attachment 4 – Required Documents by Action

All documents should be unprotected PDFs.
Each numbered document, i.e. 1, 2, 3 should be a SEPARATE PDF.
Do NOT include Sensitive PII.

<u>New Lease, Succeeding Lease, Existing Requirement New Lease</u>

The below applies to leases, licenses, permits, and other agreements but many of the documents listed below may appear only in leases.

1) The lease/agreement including the following. All of the below should be included in one PDF. All documents should be signed or initialed.
    a. The SF-2 (or license or permit)
    b. Riders, exhibits or other initialed attachments to the lease, license, or permit.
    c. The Request for Lease Proposal (RLP) or Solicitation for Offers(SFO) but ONLY if part of the Lease
    d. Form 3517 (or relevant version such as 3517A), General Clauses
    e. Form 3518 (or relevant version), Representations and Certifications
    f. Form 1217, Lessor's Annual Cost Statement
2) The entire completed and fully executed Lease Determination Worksheet (LDW) (if an LDW was completed for the action).
3) The completed form CD-435 for capital leases.
4) The completed and signed (by the Contracting Officer) Data Entry Form. If a cost lease, the completed Finance Lease Data Sheet initialed by the Contracting Officer. If a cost lease and a Journal Voucher is applicable, the FRPM Journal Voucher form.
5) The Complex Report (the Facility Support Assistants (FSAs) will provide in the VFR).

<u>Lease Renewals and other actions on an Existing Lease/Agreement (includes Lease Administrative Actions, such as CPI, tax, and rent adjustments)</u>

1) The Supplemental Lease Agreement (SLA) or any other amendment, letter, or document altering the lease/agreement terms. The SLA should be numbered with the appropriate sequential number.
2) The lease/agreement per #1) above.
3) All other SLAs (or other executed documents) for the lease. EACH SLA (or document) should be sent as a separate PDF file.

For 2) and 3), if the Realty Specialist confirms, by checking the VFR, that the lease, all previous SLAs and previously executed documents for the lease have already been placed in the VFR then the realty specialist should note on the Checklist that they have reviewed the

VFR and all previous lease and SLAs/executed documents are already contained within the relevant VFR folder.

4) The completed and signed (by the Contracting Officer) Data Entry Form. If a cost lease, the completed Finance Lease Data Sheet initialed by the Contracting Officer. If a cost lease and a Journal Voucher is applicable the FRPM Journal Voucher form.
5) The Complex Report (provided by the FSAs).

Construction Work in Progress

These are normally managed by the RPMD Financial Analyst working with the FSAs.

1) The Determination Memorandum. Normally provided by the RPMD Financial Analyst.
2) The Beneficial Occupancy Date Memorandum. Normally provided by the RPMD Financial Analyst.
3) Form 37-6. Normally provided by the RPMD Financial Analyst.
4) An Excel worksheet with the breakdown for the 37-6, as applicable.
5) The Data Entry Form. Normally completed by a Facility Support Assistant.

Lease/Agreement Terminations/Expirations

1) The executed Termination Letter or Amendment to the Lessor.
2) Documentation from the primary NOAA occupant (line or staff office) regarding its desire to terminate.
3) A copy of the lease or real estate instrument being terminated and any relevant SLA or amendment (if it relates to termination rights, restoration requirements, etc.). If the realty specialist has verified that the lease and any relevant SLAs or amendments are already in the appropriate VFR folder then this may be indicated on the Data Entry Form Checklist in lieu of providing the document.
4) Confirmation of Equipment Removal if relevant.
5) Executive Summary of any environmental report.
6) The Data Entry Form.

Outgrants

1) The outgrant agreement.
2) The Data Entry Form.
3) As applicable, any other documentation of the outgrant.

Owned, Non-CWIP Acquisitions/Purchases/Transfers of Real Property to NOAA Ownership

For real property added to NOAA's real property inventory through means other than the CWIP program, i.e. purchase, transfer, donation, the realty specialist shall work with their supervisor to determine what documentation should be recorded in the VFR. Any Deed or other ownership document should be included.

Owned Disposals and Excessing of Property

The Realty Specialist shall work with their supervisor and the FSAs to ensure adequate documentation is placed in the VFR. The below is a list of the minimum required documentation. If disposal/excess is not through the GSA process (i.e. independent statutory authority exists) then contact FSAs.

1) Documentation from the primary NOAA occupant (line or staff office) regarding its desire to dispose or excess of the property. (A signature of the primary occupant on the SF-118 may substitute.)
2) The GSA SF-118 Report of Excess Real Property completed form and its attachments including the Disposal Determination, the Excess Real Property Checklist, and the GSA Inspection report.
3) The NOAA Letter to GSA covering the Disposal Package.
4) The Chief Administrative Officer signed Memorandum approving of the Disposal.
5) The GSA Approval of Report of Excess Letter.
6) The executive summary of any environmental survey or documentation, if applicable.
7) The Data Entry Form.

Transfers

The Realty Specialist shall work with their supervisor and the FSAs to ensure adequate documentation is placed in the VFR. The below is a list of the minimum required documentation.

1) Documentation from the primary NOAA occupant (line or staff office) regarding its desire to transfer the property. (A signature of the primary occupany on GSA Form 1334 may substitute.)
2) The GSA Form 1334.
3) Any letters to GSA including regarding no cost transfer exceptions.
4) The GSA SF-118 Report of Excess Real Property completed form and its attachments including the Disposal Determination, the Excess Real Property Checklist, and the GSA Inspection report.
5) GSA Letter of Approval.
6) Any letters or memorandum to OMB and any Letters of Notification to Congress.

7) The executive summary of any environmental survey or documentation if applicable.
8) The Data Entry Form.

GSA Occupancy Agreements

Realty Specialists are responsible for ensuring that RPMD's GSA Rent Program Manager receives all signed pro forma, final, administrative, and other Occupancy Agreements.

Bulletin #29 Attachment 5 - Naming Conventions Detail

<u>Lease or Other Agreement</u>

1. **Lease/Other Agreement**
    a. Lease/Other Agreement
        i. Lease or Instrument number
        ii. 2 letter state abbreviation
        iii. City
        iv. Type of instrument using the abbreviation (see list of most commonly used contract documents in the Abbreviations Section below.) LEA, PER, LIC, etc.
        v. If applicable, the number used by the Lessor for their instrument, i.e. if the Coast Guard has a permit number that is different from NOAA's permit number (see example below).
        vi. *example:* **12WSF0241i AK Kodiak PER HSCG891270053**
    b. SLA's/Amendments
        i. Lease or instrument number
        ii. 2 letter state abbreviation
        iii. City
        iv. SLA or amendment number (i.e. SLA-1, SLA-2, etc.) Note: If a letter has been used, in lieu of a formal SLA or amendment, the letter exercising the renewal option should be placed in this subfolder. If the amendment is not a formal SLA then use an abbreviation such as RO (for Renewal Option), Notice (for a notice), Letter (for a letter), CORR (for other correspondence).
        v. The year the SLA or Amendment was executed (signed by the RPMD Contracting Officer. This should be the year in the date next to the signature of the CO. If there is no date next to the signature then it should be the year in the date at the top of the SLA/Amendment.).
        vi. An abbreviation(s) indicating the main reason for the SLA or amendment, i.e. CPI, taxes, renewal, or termination exercised. See the abbreviations section at the end of this document for a list of the most common. If there are more than two reasons use the abbreviation for the primary reason and then the abbreviation MULTI
        vii. *example:* **12WSF0241 AK Kodiak SLA-1 2012 CPI MULTI**
    c. Lease Termination Correspondence with the Lessor
        i. Lease number or instrument #
        ii. 2 letter state abbreviation
        iii. City
        iv. "Termination Letter"
        v. The Date the Termination is to be effective (i.e. after any required notification period)

vi. *example:* **12WSF0241 AK Kodiak Termination Letter 9-30-2012**

d. Documentation from the Line/Staff Office Requesting Termination
   i. Lease number or instrument #
   ii. 2 letter state abbreviation
   iii. City
   iv. Line/Staff Office Abbreviation "Request to Terminate"
   v. The Date of the Correspondence
   vi. *example:* **12WSF0241 AK Kodiak NWS Request to Terminate 7-30-2012**

e. Confirmation of Equipment Removal
   i. Lease number or instrument #
   ii. 2 letter state abbreviation
   iii. City
   iv. "Equipment Removal"
   v. Date of Document
   vi. *example:* **12WSF0241 AK Kodiak NWS Equipment Removal 7-30-2012**

f. Executive Summary or other Summary Environmental Closeout Document
   i. Lease number or instrument #
   ii. 2 letter state abbreviation
   iii. City
   iv. "Environmental"
   v. The Date of the Report
   vi. *example:* **12WSF0241 AK Kodiak Environmental 5-30-2012**

2. Real Property Data Entry Form and LDW

a. Real Property Data Entry Form
   i. City
   ii. 2 letter state abbreviation
   iii. Complex number
   iv. Code for type of action (codes listed below)
      1. NEW = new
      2. SUP= supplemental
      3. SCED = succeeding
      4. TER = termination
      5. OUT = outgrant
      6. CWIP = construction work in progress
   v. The abbreviation "DE" indicating Data Entry Form
   vi. FSA's will fill in the date the form is submitted
   vii. *example:* **Cedar Rapids IA 0IAC004 SCED DE 5-30-2012**

b. Lease Determination Worksheet
   i. City

ii. 2 letter state abbreviation
iii. Complex #
iv. LDW
v. The year the LDW was executed
vi. *example:* **Cedar Rapids IA 0IAC004 LDW 2012**

c. Form CD-435

i. City
ii. 2 letter state abbreviation
iii. Complex #
iv. CD-435
v. The year the CD-435 was executed
vi. *example:* **Cedar Rapids IA 0IAC004 CD-435 2012**

3. Complex Report

a. City
b. 2 letter state abbreviation
c. Complex number
d. The word "Complex"
e. Date report was run
f. *example:* **Barrow AK DAK0405 Complex 9-12-2012**

4. CWIP

a. Determination Memorandum
   i. City
   ii. 2 letter state abbreviation
   iii. Complex number
   iv. The following phrase: "Determination Memo"
   v. Date the memo was signed by Real Property Management (currently the Region Chief or RPMD Deputy Director signs the Determination Memorandum)
   vi. *example:* **Fairbanks-Gilmore Creek AK 0AKW155 Determination Memo 7-15-2012**
b. Beneficial Occupancy Date (BOD) Memorandum
   i. City
   ii. 2 letter state abbreviation
   iii. Complex number
   iv. "BOD"
   v. Date initialed by the Project Manager (this is normally an official from PPMD (or NESDIS if it is a NESDIS project))
   vi. *example:* **Fairbanks-Gilmore Creek AK 0AKW155 BOD 8-9-2012**

c. Form 37-6
    i. City
    ii. 2 letter state abbreviation
    iii. "37-6"
    iv. Property ID
    v. Date the form was executed (date of the last signature on the form. This is normally the NOAA Property Management Officer, currently the Region Chief or the RPMD Deputy Director.)
    vi. EXAMPLE: **Fairbanks-Gilmore Creek AK 37-6 14001207 8-9-2012**
d. Excel Spreadsheet/Cost Breakdown Worksheet
    i. The following phrase: Cost Breakdown for 37-6
    ii. Property ID
    iii. City
    iv. Complex number
    v. Date form was filled out
    vi. *example**:*** **Cost Breakdown for 37-6 14001207 Fairbanks-Gilmore Creek 0AKW155 7-10-2012**
e. Date Entry Sheet
    i. Name of line office
    ii. City
    iii. 2 letter state abbreviation
    iv. "CWIP DE"
    v. Complex number, followed by a dash, then property ID
    vi. Date form was filled out by FSA's
    vii. *example:* **NESDIS Fairbanks-Gilmore Creek AK CWIP DE AKW154-14001207 7-10-2012**

5. Outgrants

a. Outgrant Agreement
    i. Permit number OR instrument number
    ii. 2 letter state abbreviation
    iii. City
    iv. The word OUT
    v. The property descriptive name to identify which property the outgrant applies to.
    vi. *example:* **10EKF0001O LA Lafayette OUT NMFS Research Building**
b. Data Entry form
    i. City
    ii. 2 letter state abbreviation
    iii. Complex number

iv. The word OUT
v. DE
vi. The property descriptive name to identify which property the data entry form applies to.
vii. *example:* **Lafayette LA 0LAC046 OUT DE NMFS Research Building**

c. Other Outgrant Documentation
i. City
ii. 2 letter state abbreviation
iii. Complex #
iv. The words "Outgrant" and an abbreviated name of the document
v. Date of the document
vi. *example:* **Lafayette LA OLAC046 Outgrant Cooperative Agreement 3-30-2012**

<u>Owned</u>

1. Deed, Ownership, or Transfer Document
a. Property ID
b. 2 letter state abbreviation
c. City
d. Property Name from FRPM
e. A descriptor of B, S, or L or combination thereof depending on if the property has/is a Building, Structure, and/or Land.
f. Type of document
g. *example*: **CAW07201 CA San Diego SW Fisheries Center Site L Deed**

2. **CWIP** (see CWIP naming conventions below under Lease or Other Agreement)

3. **Complex Reports** (see applicable Complex Reports naming conventions under Lease or Other Agreement)

4. **Outgrants** (see Outgrants naming conventions under Lease or Other Agreement)

5. Disposed
Documents will vary (see Attachment 4: Documents Requirements by Action). The name of the file should include the City, State, Property ID, an abbreviated name of the document, and the year the document was executed. *Examples:*
a. **San Diego CA CAW07201GSA Approval of Disposal 2012**
b. **San Diego CA CAW07201 Disposal SF-118 2012**
c. **San Diego CA CAW07201 Disposal NOAA Ltr to GSA 2012**
d. **San Diego CA CAW07201 Disposal CAO Memo to GSA 2012**
e. **San Diego CA CAW07201 GSA Acceptance of Disposal**

If the disposal method is a transfer, *examples*:
a. San Diego CA CAW07201 Transfer Form 1334 2012

b. **San Diego CA CAW07201Transfer Letter to GSA 2012**
c. **San Diego CA CAW07201 Transfer Congressional (or OMB Letter(s)) 2012**

GSA Controlled

1. **Pro-Forma, Final, and Administrative OAs**
    a. OA number and version number
    b. Type of OA ("Proforma", "Final", or "Admin")
    c. The reason for the OA (Extension, Re-measurement, CPI, Rent Adjustment, etc.)
    d. City
    e. Tenant Line/Staff office (NMFS, CAO, etc. or Multiple)
    f. *example:* **AAK03667v3 Final Anchorage NMFS**

2. **Complex Report**
    a. City
    b. 2 letter state abbreviation
    c. Complex number
    d. The word "Complex"
    e. Date report was run
    f. *example:* **Anchorage AK AK0001Z Complex 09-12-2012**

ABBREVIATIONS

List of Most Commonly Used Contract and Ownership Instruments

Type of Instrument	Title to be used in File Name
Commercial Lease	LEA
License	LIC
Permit	PER
Public Land Order	PLO
Easement	EAS
Interagency Support Agreement	ISA
Gratuitous Agreement	GRA
Right(s) of Way	ROW
Cooperative Agreement	COA
Deed	DEED
Transfer Document	TRA

List of the Most Commonly Used SLA/Amendment Actions

SLA Actions	Abbreviation
Consumer Price Index Escalation	CPI
Real Estate Tax Escalation	TAX

Step Rent Increase	STEP
Rent Adjustment	RADJ
Renewal Option Exercised	RO
Rent Commencement Date Changed	RENT DATE
Space Changed (expanded, reduced)	SPACE
Extension	EXT
Termination Option Exercised, Expiration	TER
Multiple Changes (more than 2) Note: If there are more than 2, first enter the code for primary reason for the SLA/Amendment then the word MULTI. For example, TAX MULTI	MULTI

Bulletin #29 Attachment 6

RPMD Virtual File Room Naming Conventions

In order to provide standardization within the Virtual File Room (VFR), RPMD has developed naming conventions for files within the VFR. The following are examples of the different file types as well as information on commonly used abbreviations. The below are examples of the naming conventions for some of the most common documents. For more detailed information and naming conventions for documents not listed below see Attachment 5.

Lease or other Agreement

Lease or Other Agreement – Contract File: 12WSF0241i AK Kodiak PER HSCG891270053

Lease or instrument # | Type of instrument | State and City | Number used by Lessor for instrument

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Supplemental Lease Agreements/Amendments: 12WSF0241 AK Kodiak SLA-1 2012 CPI

Lease or instrument # | Type of instrument and sequential # | Reason for Amendment | State and City | Year Executed

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Data Entry Form: Cedar Rapids IA 0IAC004 SCED DE 9-12-2012

City and State | Type of Data Entry Form | Complex # | The letters "DE" | Date DE form submitted

Data Entry Form Type
1. NEW = new
2. SUP= supplemental
3. SCED = succeeding
4. TER = termination
5. OUT = outgrant
6. CWIP = construction work in progress

Lease Determination Worksheet: Cedar Rapids IA 0IAC004 LDW 2012

City and State | The abbreviation LDW | Complex # | Year LDW Executed

---

Complex Report: Barrow AK DAK0405 Complex 9-12-2012

City and State | The word "Complex" | Complex # | Date Report Run

City and State

The words "Determination Memo"

CWIP Determination Memo: Fairbanks-Gilmore Creek AK 0AKW155 Determination Memo 7-15-2012

Complex #

Date the Memo was signed by Real Property Management

City and State

The abbreviation "BOD"

CWIP Beneficial Occupancy Determination: Fairbanks-Gilmore Creek AK 0AKW155 BOD 8-9-2012

Complex #

Date initialed by the Project Manager

City and State

Property ID #

CWIP Form 37-6: Fairbanks-Gilmore Creek AK 37-6 14001207 8-9-2012

"37-6"

Date signed by the Real Property Management Officer

CWIP Excel Spreadsheet/Cost Breakdown:

Complex #

Cost Breakdown for 37-6 14001207 Fairbanks-Gilmore Creek 0AKW155 7-10-2012

"Cost Breakdown for 37-6"

Property ID #

City

Date form filled out

Line Office

Complex #, a "-", then Property ID#

CWIP Data Entry Sheet: NESDIS Fairbanks-Gilmore Creek AK CWIP DE AKW154-14001207 7-10-2012

City and State

"CWIP DE"

Date form filled out

Permit or Instrument #

"OUT"

Name/Descriptor of property subject to the outgrant

Outgrant Permit or Instrument: 10EKF0001O LA Lafayette OUT NMFS Research Building

City and State

Line Office

City and State | "OUT" | Line Office

Outgrant Data Entry Form: Lafayette LA 0LAC046 OUT DE NMFS Research Building

Complex # | DE | Name/Descriptor of property subject to the outgrant

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Owned

Property ID# | Property Name from FRPM

Deed, Ownership, or Transfer Document: CAW07201 CA San Diego SW Fisheries Center Site L DEED

Type of Instrument | State and City | Whether it is a Building (B), Structure (S), or Land (S)

Note: The type of document may be added at the end of the file name. Such as Deed, Transfer Doc., etc.

GSA Assignments

OA # and Version | City

Occupancy Agreements: AAK03667v3 Final Anchorage NMFS

Reason for OA and Pro Forma, Final, or Admin | Line Offi

OA # and Version | City

OA (2nd example): AAK03667v4 CPI Admin Anchorage NMFS

Reason for OA and Pro Forma, Final, or Admin | Line Office

City and State | The word "Complex"

Complex Report: Anchorage AK AK0001Z Complex 09-12-2012

Complex # | Date Report Run

Bulletin #29 Attachment 7 – Sensitive PII Information

This information is taken from the following DOC website. Please consult the below website links for the most up-to-date information. If there is a question as to whether information is sensitive PII please consult the website and/or your supervisor. A breach/incident of Commerce's PII policy must be reported to your supervisor and to NOAA's Computer Incident Response Team (CIRT) at ncirt@noaa.gov, 301-713-9111.

- Breach/incident are used to include the loss of control, compromise, unauthorized disclosure, unauthorized acquisition, unauthorized access, or any similar term referring to situations where persons other than authorized users and for an other than authorized purpose have access or potential access to personally identifiable information, whether physical or electronic. [OMB M-07-16]. Note: an exposure of PII (i.e., emailing unencrypted PII) without a confirmed breach is still considered to be a breach/incident.

http://ocio.os.doc.gov/ITPolicyandPrograms/IT_Privacy/PROD01_008240

and

http://ocio.os.doc.gov/ITPolicyandPrograms/IT_Privacy/index.htm

What PII is sensitive?

Sensitive PII is defined as PII which, when disclosed, could result in harm to the individual whose name or identity is linked to the information. Further, in determining what PII is sensitive, the context in which the PII is used must be considered. For example, a list of people subscribing to a government newsletter is not sensitive PII; a list of people receiving treatment for substance abuse is sensitive PII. As well as context, the association of two or more non-sensitive PII elements may result in sensitive PII. For instance, the name of an individual would be sensitive when grouped with place and date of birth and/or mother's maiden name, but each of these elements would not be sensitive independent of one another.

For the purpose of determining which PII may be electronically transmitted, the following types of PII are considered sensitive when they are associated with an individual. Secure methods must be employed in transmitting this data when associated with an individual:

- Place of birth
- Date of birth
- Mother's maiden name
- Biometric information
- Medical information, except brief references to absences from work
- Personal financial information
- Credit card or purchase card account numbers
- Passport numbers
- Potentially sensitive employment information, e.g., personnel ratings, disciplinary actions, and result of background investigations
- Criminal history

- Any information that may stigmatize or adversely affect an individual.

This list is not exhaustive, and other data may be sensitive depending on specific circumstances.

Social Security Numbers (SSNs), including truncated SSNs that include only the last four digits, are sensitive regardless of whether they are associated with an individual. If it is determined that such transmission is required, then secure methods must be employed.

What PII is non-sensitive?

The following additional types of PII may be transmitted electronically without protection because they are not considered sufficiently sensitive to require protection.

- Work, home and cell phone numbers
- Work and home addresses
- Work and personal e-mail addresses
- Resumes that do not include an SSN or where the SSN is redacted
- General background information about individuals found in resumes and biographies
- Position descriptions and performance plans without ratings

The determination that certain PII is non-sensitive does not mean that it is publicly releasable. The determination to publicly release any information can only be made by the official authorized to make such determinations. The electronic transmission of non-sensitive PII is equivalent to transmitting the same information by the U.S. mail, a private delivery service, courier, facsimile, or voice. Although each of these methods has vulnerabilities, the transmitted information can only be compromised as a result of theft, fraud, or other illegal activity.