

CLIENT ALERT

New Rule Requires Contractors to Report Data for DoD Service Contracts in SAM

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On July 9, 2021, the U.S. Department of Defense (DoD) published a [Final Rule](#) to require contractors to report data in the System for Award Management (SAM) on an annual basis when they are awarded a DoD contract or task order that: (1) is valued in excess of \$3 million, and (2) is for logistics management services, equipment related services, knowledge-based services, or electronics and communications services. When applicable, contractors will be required to annually report: (1) the total dollar amount invoiced for, and (2) the total number of direct labor hours expended on services performed under the contract or task order during the preceding fiscal year. The total number of direct labor hours reported to SAM should be the total of both the contractor hours and its first-tier subcontractors' hours.

For more information, please contact the professional(s) listed below, or your regular Crowell & Moring contact.

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