

## **NROTC Unit Supply Binder – Tab 3-3a**

**Date:** August 2025

### **SUBJECT: 889 Vendor Verification Procedures**

#### **1. PURPOSE**

To inform NROTC Units of the process for conducting 889 Vendor Verification. This document outlines the required steps to validate a vendor's legal ability to conduct business with the U.S. Government or a government entity.

#### **2. OVERVIEW**

889 Vendor Verification is the process by which a vendor's legal ability to conduct business with the Government or Government entity is validated. This verification is mandated by Section 889 of the National Defense Authorization Act (NDAA). Compliance ensures that NROTC units are not procuring goods or services from vendors using prohibited telecommunications equipment or services.

#### **3. REFERENCES**

- (a) NAVSUPINST 4200.99 (Series)
- (b) Simplified Acquisition Procedures Guide, April 2018
- (c) NSTC M-1533.2
- (d) NSTC Ordering Policy
- (e) NSTC Supply Requirement Form
- (f) Purchase Order Request Form

#### **4. APPLICABILITY**

This procedure applies to all NROTC Unit personnel involved in procurement activities, including but not limited to:

- Government Purchase Card (GPC) Cardholders
- Approving Officials (AOs)
- Supply Officers
- Any individual authorized to make purchases on behalf of the NROTC Unit.

#### **5. ACTION REQUIRED**

## 5.1 General Requirements

Effective 13 August 2020, and as per 4200.99D, GPC cardholders must ensure compliance with FY 2019 NDAA Section 889 (a)(1)(B) by ensuring merchants provide/or have provided a written representation of compliance *before* the transaction is made. GPC cardholders are to follow the requirements for a representation as outlined in the 4200.99D.

## 5.2 Methods of Obtaining 889 Representation

Cardholders (CHs) can obtain the 889 representation using one of the following methods:

- **Directly from the Vendor:** Request a written representation of compliance from the vendor.
- **System for Award Management (SAM):** Verify the vendor's status in SAM.gov (see Section 6).
- **Robotic Process Automation (RPA) Feature (889 Bot email):** Use the automated email system to request verification. (see Section 7).
- **GSA SmartPay Website 889 Representation Tool:** Utilize the online tool provided by GSA SmartPay. (see Section 8).

## 5.3 Validity of Representation

A provided Section 889 representation is valid for one Fiscal Year (FY) and will remain valid until the end of the FY.

## 6. 889 Vendor Verification via System for Award Management (SAM.gov)

The System for Award Management (SAM.gov) is an official website of the U.S. Government. It is used by vendors to register to do business with the U.S. Government, update, renew, or check the status of an entity registration or for a vendor to get a Unique Entity ID.

Government entities can use SAM to check the validity of a vendor's status to determine if they are still legally allowed to do business with the government.

### Procedure:

- a. **Access SAM.gov:** Log in to the System for Award Management (SAM.gov) at <https://sam.gov/>.

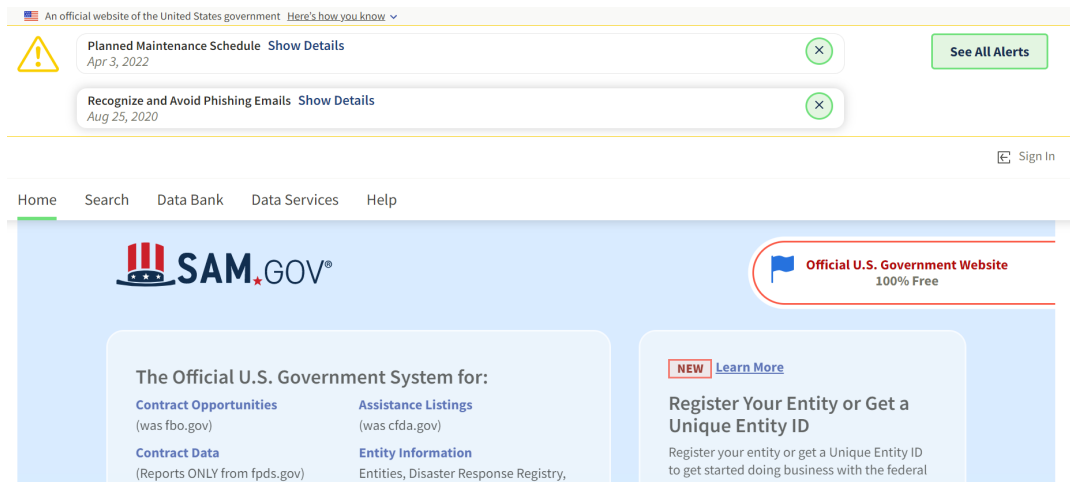


Figure 6.1. SAM.gov Homepage.

## b. Initiate Search: Select “Search.”

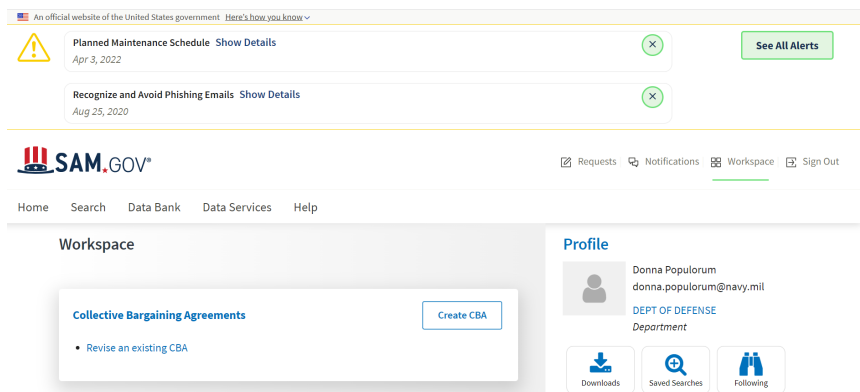


Figure 6.2. SAM.gov Search.

## c. Select Search Criteria: Select “Domain”, and then select “Entity Information.”

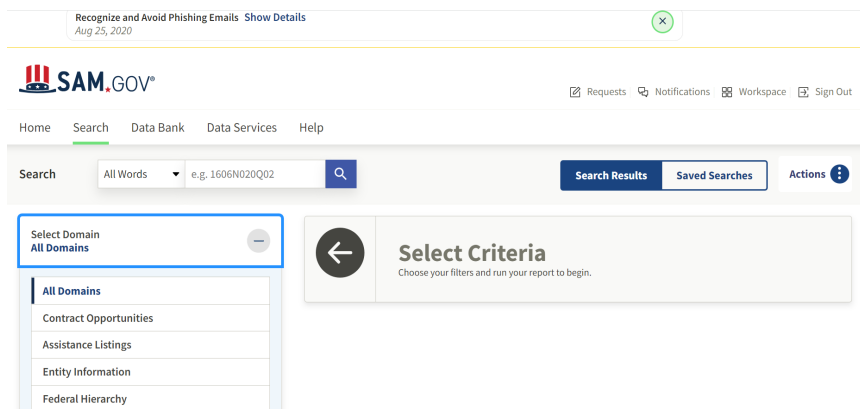


Figure 6.3. SAM.gov criteria selection.

## d. Enter Vendor Name: In the “Search” field, type in the vendor name and select “Search.”

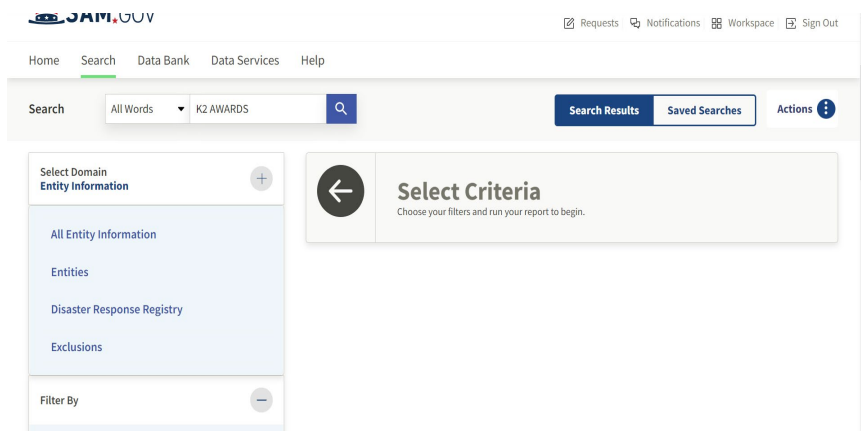


Figure 6.4. SAM.gov entering entity name.

e. **Select Vendor:** Select the appropriate vendor from the search results.

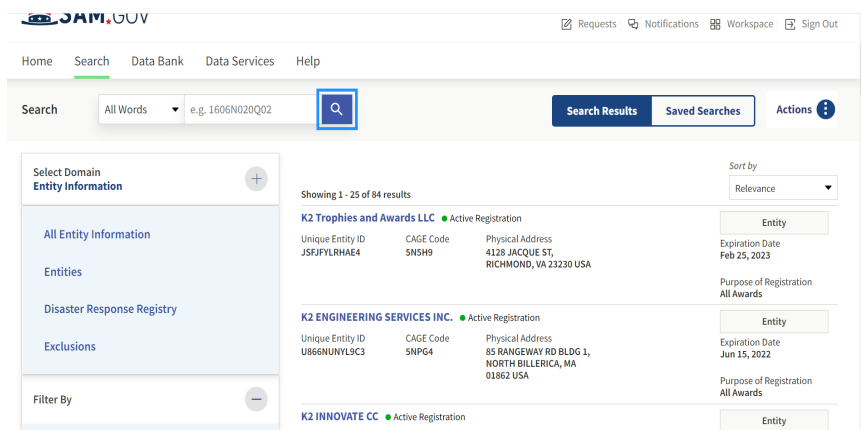


Figure 6.5. SAM.gov selecting entity.

f. **Locate FAR Statement:** Scroll to FAR Statement 52.204-26 and select and expand the section. *It is critical that this entire FAR statement is displayed when printing the SAM report.*

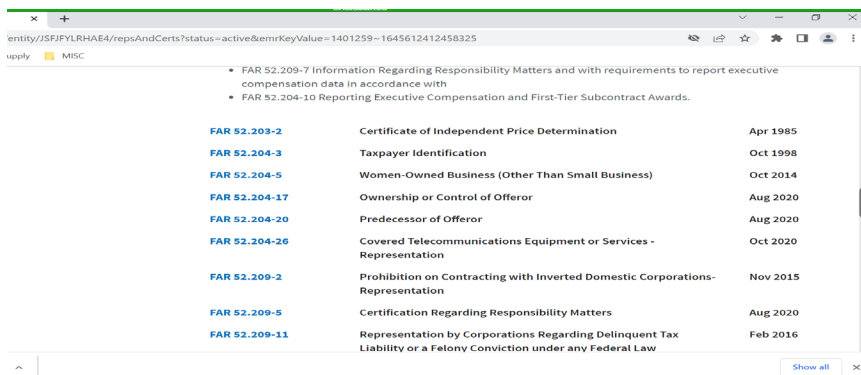


Figure 6.6. SAM.gov expanding the FAR statement.

g. **Verify Compliance:** Ensure the selected vendor is listed in the FAR statement as "Does Not" use those restricted telecommunications. If the vendor "Does" use restricted telecommunications, that vendor *may not* be used as they are non-compliant.

The screenshot shows the FAR statement compliance verification page for K2 TROPHIES AND AWARDS LLC. The page is divided into two main sections: FAR 52.204-17, 52.204-20, and 52.204-26, and FAR 52.209-2. The first section, FAR 52.204-17, 52.204-20, and 52.204-26, is titled "Ownership or Control of Offeror" and "Predecessor of Offeror" and "Covered Telecommunications Equipment or Services - Representation". It includes definitions, procedures, and representations. The second section, FAR 52.209-2, is titled "Prohibition on Contracting with Inverted Domestic Corporations".

FAR Section	Section Title	Effective Date
FAR 52.204-17	Ownership or Control of Offeror	Aug 2020
FAR 52.204-20	Predecessor of Offeror	Aug 2020
FAR 52.204-26	Covered Telecommunications Equipment or Services - Representation	Oct 2020
FAR 52.209-2	Prohibition on Contracting with Inverted Domestic Corporations	Nov 2015

(a) Definitions. As used in this provision, "covered telecommunications equipment or services" and "reasonable inquiry" have the meaning provided in the clause at 52.204-25, Prohibition on Contracting for Certain Telecommunications and Video Surveillance Services or Equipment.

(b) Procedures. The Offeror shall review the list of excluded parties in the System for Award Management (SAM) (<https://www.sam.gov>) for entities excluded from receiving federal awards for "covered telecommunications equipment or services."

(c) (1) Representation. The Offeror represents that it ☒ DOES NOT provide covered telecommunications equipment or services as a part of its offered products or services to the Government in the performance of any contract, subcontract, or other contractual instrument.

(2) After conducting a reasonable inquiry for purposes of this representation, the offeror represents that it ☒ DOES NOT use covered telecommunications equipment or services, or any equipment, system, or service that uses covered telecommunications equipment or services.

Figure 6.7. SAM.gov Verifying FAR statement compliance.

h. **Download Report:** Select "Download Reports" and then select "FAR."

The screenshot shows the Download Reports page for K2 TROPHIES AND AWARDS LLC. The page has a sidebar with navigation links: Entity Registration, Core Data, Assertions, Reps and Certs (FAR/DFARS), Certification, Read Only Provisions, Provisions Populated Based On Registration Data, Reps and Certs (Financial Assistance), Exclusions, and Responsibility / Qualification. The main content area displays the entity's registration details, including Unique Entity ID, CAGE/NCAGE, Physical Address, and Mailing Address. The "Download Reports" dropdown menu is open, showing options for FAR and FAR & DFARS.

Entity Registration

Core Data

Assertions

Reps and Certs (FAR/DFARS)

Certification

Read Only Provisions

Provisions Populated Based On Registration Data

Reps and Certs (Financial Assistance)

Exclusions

Responsibility / Qualification

K2 TROPHIES AND AWARDS LLC

Unique Entity ID: JSFJYLRHAE4

Registration Status: Active Registration

Expiration Date: Feb 25, 2023

CAGE/NCAGE: SNSH9

Purpose of Registration: All Awards

Physical Address: 4128 Jacque ST, Richmond, Virginia 23230-3214, United States

Mailing Address: 4128 Jacque Street, Richmond, Virginia 23230, United States

Version: Current Record

Download Reports

FAR

FAR & DFARS

**CERTIFICATION**

I have read each of the FAR and DFARS provisions presented on this page. By submitting this certification, I, **Chadla Moss**, am attesting to the accuracy of the representations and certifications.

Figure 6.8. SAM.gov Downloading FAR report.

i. **Select File Type:** Select "File type PDF" and then select "Download." Save the PDF for your records.

The screenshot shows the Download Options dialog box. The "Select File Type" dropdown menu is open, showing the ".pdf" option. The "Name File" field is required and contains the text "FAR-20220404-064712". The "DOWNLOAD" button is visible.

Download Options

Select File Type

.pdf

Name File (Required): FAR-20220404-064712

DOWNLOAD

Figure 6.9. SAM.gov selecting file type.

## 7. 889 Vendor Verification via Robotic Email Verification

The automated email "bot" allows for a request to be sent to receive an 889 Vendor Verification email in response.

### Prerequisites:

- You will need the vendor's Unique Entity Identifier (UEI) Number or CAGE Code.
  - A UEI number should be exactly 9 digits long and should not contain any letters, extra characters, or spaces (e.g., 000111222).
  - A CAGE Code will be the first five characters of the Item ID or in the Supplier CAGE field (e.g., A1234).

### Procedure:

a. **Send Email:** Send an email to [osd.section889request@mail.mil](mailto:osd.section889request@mail.mil) noting a valid UEI number or CAGE code in the subject line. For example: "Subject: UEI 000111222" or "Subject: CAGE Code A1234"

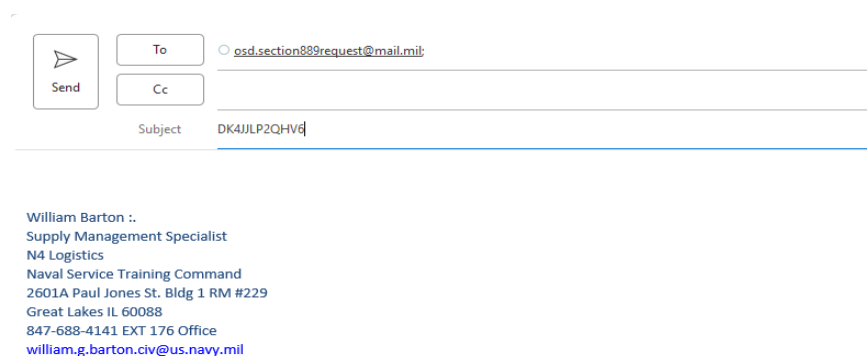


Figure 7.1. Sending email to 889 "Bot".

b. **Receive Response:** A response email (generally within 5 minutes) will be sent with the vendor's 889 information noted in the body of the email. Print the email and add it to the transactional file.

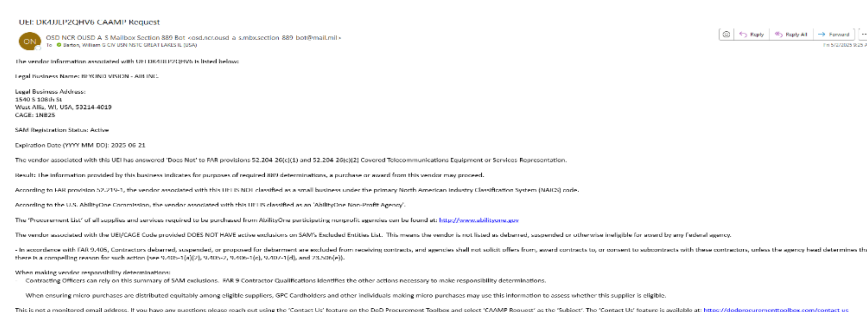


Figure 7.2. 889 "Bot" response.

## 8. 889 Vendor Verification via the GSA SmartPay Site Search

The GSA SmartPay 889 Representations search website allows search by business name, website, CAGE code, or SAM.gov Unique Entity ID (UEI).

### Procedure:

- a. **Access Website:** Navigate to <https://889.smartpay.gsa.gov/#/>.
- b. **Enter Search Criteria:** In the search bar, enter the business name, website, CAGE code, or UEI.

An official website of the United States government [Here's how you know](#)

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## 889 Representations Search

**Search Issues**  
We are having technical issues that may cause search errors on the 889 tool. The GSA technical team is working to solve the issue. Thank you for your patience.

**Check to see if an entity has a section 889 representation in SAM.gov**  
Search by business name, website, CAGE code, or SAM.gov Unique Entity ID (UEI)

**Search**

This tool only checks for Section 889 representations in an entity's SAM.gov record. Only entities doing business above the Micro-Purchase Threshold (MPT) are required to register in SAM.gov. Contracts that are classified/FOUO or contractors that do not wish for their information to be publicly available will not show up in search results.

**Please Note:** If an entity representation is not available, cardholders may still be permitted to purchase from a listed entity. However, the cardholder would be responsible for documenting compliance with Section 889 in accordance with any applicable agency requirements.

This tool was built by NASA using the SAM.gov Entity Management API. We encourage input! Please provide feedback and suggestions to [gsa\\_smartpay@gsa.gov](mailto:gsa_smartpay@gsa.gov).

Limitation on Permissible Use of Dun & Bradstreet, Inc. (D&B) Data

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An official website of the General Services Administration

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Figure 8.1. Entering Cage Code / UEI in 889 Representations Search.

- c. **Review Results:** The 889 Vendor Verification for the business will populate. Download or print the results.

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## 889 Representations Search

Search by business name, website, CAGE code, or SAM.gov Unique Entity ID (UEI)

**Search**

Displaying 1 results

**Definition of symbols** +

**T-MOBILE USA, INC.** ✓  
www.t-mobile.com  
BELLEVUE, WA USA SAM.gov UEI: ZVW2T2CCG7V9 CAGE: 3BQL1

This tool was built by NASA using the SAM.gov Entity Management API. We encourage input! Please provide feedback and suggestions to [gsa\\_smartpay@gsa.gov](mailto:gsa_smartpay@gsa.gov).

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Figure 8.2. 889 Representations Search Vendor Information.

d. **Verify Information:** Once downloaded, the Summary of SAM.gov Data will appear. Ensure that the following is noted:

- Registration status = “Active”.
- Any Active Exclusions = “No.”
- Expiration Date = is within current FY timeframe.
- 889 Representations Summary = “Compliant.”
- Both FAR Statements state the Vendor “DOES NOT”.

## Summary of SAM.gov Data

Generated on July 18, 2024 by the SmartPay 889 tool from SAM.gov data using the openGSA SAM.gov Entity Management API.

Entity Registration Summary

Summary for:  
**T-MOBILE USA, INC.**  
<http://www.t-mobile.com>  
SAM.gov UEI: ZVW2T2CCG7V9  
CAGE: 3BQL1  
  
12920 SE 38TH ST  
BELLEVUE, WA 98006+1350  
USA  
  
Registration Status: **Active**  
Has Active Exclusion? **No**  
Activation Date: **2024-04-11**  
Expiration Date: **2025-04-09**

(End of Entity Registration Summary)

889 Representations Section

889 Representations Summary: **COMPLIANT**  
  
**The contractor has represented as follows in FAR 52.204-26 (c) (OCT 2020) , Covered Telecommunications Equipment or Services-Representation:**  
  
(1) The Offeror represents that it DOES NOT provide covered telecommunications equipment or services as a part of its offered products or services to the Government in the performance of any contract, subcontract, or other contractual instrument.  
  
(2) After conducting a reasonable inquiry for purposes of this representation, the offeror represents that it DOES NOT use covered telecommunications equipment or services, or any equipment, system, or service that uses covered telecommunications equipment or services.

(End of 889 Representations Section)

The full entity record can accessed at: <https://SAM.gov/>

Figure 8.3. 889 Representations Search Vendor Information printout.



## 9. TROUBLESHOOTING

- If you encounter difficulties using any of these verification methods, contact one of the points of contact listed below for assistance.
- If a vendor is listed as non-compliant, contact your Supply Officer for guidance on alternative vendors.

**In conclusion, this document has outlined the mandatory 889 Vendor Verification procedures for all NROTC Unit personnel involved in procurement activities. To ensure compliance with Section 889 of the National Defense Authorization Act (NDAA) and to avoid procuring goods or services from vendors using prohibited telecommunications equipment or services, please adhere to the following actions:**

1. **Prior to any transaction:** All GPC cardholders and authorized purchasers must obtain a written representation of compliance from the vendor *before* the transaction is made.
2. **Utilize approved verification methods:** Employ one of the approved methods for 889 Vendor Verification: Direct Vendor Inquiry, SAM.gov, Robotic Process Automation (RPA) Feature (889 Bot email), or the GSA SmartPay Website 889 Representation Tool.
3. **Document Verification:** Ensure verification documentation is retained and filed appropriately, including downloaded reports, emails, or printed website confirmations.
4. **Non-Compliant Vendors:** If a vendor is found to be non-compliant, immediately consult with your Supply Officer for guidance on alternative vendors.

## 10. POINTS OF CONTACT

William Barton  
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GAM  
Coordinator  
847-688-4141 x 176  
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