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Federal Contract Novation After Acquisition: Award Ledger

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In this article

1. Executive Summary
2. Introduction and Background
3. Definition and Taxonomy: Corporate Events Versus Contract Events
4. Governing Text Versions: Legacy FAR, Overhaul Text and Agency Deviations
5. The Evidence Ladder: From Announcement to Later Current Record
6. Identity and Data Plumbing: SAM, UEI, CAGE, FPDS and USAspending
7. Case Examples (Hypothetical Examples)
8. Data Analysis and Evidence
9. The Award Event Ledger: Fields and Outcomes
10. Implications and Future Directions
11. Frequently Asked Questions (FAQs)
12. Conclusion

Executive Summary

A federal contract award is a record about a **contracting party on a date**, not about a corporate brand. When a government-services business is acquired, merged, carved out or renamed, the public award history can be joined to the current company only after the corporate event and the contract event are separated and each is tied to a dated, versioned source. This report sets out a reproducible, award-level ledger for doing that, aimed at private-equity origination analysts and research reviewers screening public contract evidence.

The legal baseline is short. Federal law bars a contract party from transferring a contract or order to another party (www.law.cornell.edu), and the ordinary FAR (Federal Acquisition Regulation) **Subpart 42.12** lets the Government recognize a successor in interest only when the third party's interest arises from a transfer of all the contractor's assets or the entire portion of assets involved in performing the contract. The stock-purchase exception is conditional: a novation agreement is unnecessary for a stock purchase only with no legal change in the contracting party, and only while that party remains in control of the assets and performs the contract (www.acquisition.gov). A name-only change runs through a separate change-of-name agreement.

The governing text is not uniform. The ordinary FAR page shows **FAC 2026-01**, effective 03/13/2026, while the overhaul guide places novation at **Subpart 42.9** (www.acquisition.gov) and lists **31 agency deviations** for Part 42. The Nuclear Regulatory Commission (NRC) deviation is dated **December 11, 2025**, and agency deviations of this kind run until rescinded or incorporated. Size rerepresentation and recertification run on their own 30-day clocks (www.law.cornell.edu), and FPDS (Federal Procurement Data System) offers distinct reason codes for novations and for non-novation name or UEI changes (fpds.gov). No fetched source states a section-level crosswalk, so mapping 42.1204 to 42.903 and 42.1205 to 42.904 rests on matching titles and must be checked per contract.

On the data side, USAspending states contract data generally appear within **about five days** of an award or modification (www.usaspending.gov), with **a 90-day delay** for Department of Defense (DoD) and Army Corps of Engineers data (www.usaspending.gov). Award-level recipient fields are drawn from the latest transaction (api.usaspending.gov), which is why a successor label can appear on an old award without a single document

in the public record. The ledger therefore returns one of five outcomes per award: continuity-supported, successor-supported for specified awards, historical-only, public-record-mismatch or unresolved. Obligations are never converted to revenue or backlog, no processing-time benchmark is asserted, and the worksheet does not decide legality or eligibility. All case examples are fictional.

Introduction and Background

Public contract data answers a narrow question well: which government office recorded which action with which recipient on which date. Acquisition research asks a broader one: does that old award support a claim about the business now being screened? The gap between the two questions is where double counting, mislabeled predecessors and overstated continuity enter a target list.

Three independent clocks run in any acquisition of a federal contractor. The corporate clock covers announcement, signing, closing and any state filing. The contract clock covers a request to the responsible contracting officer, a recognition decision, an executed agreement and a contract modification. The data clock covers registration updates, contract action reports and publication on USAspending. A reviewer who reads one clock as evidence for another will mislabel awards. This report keeps them apart and gives each a column in a ledger.

The audience is origination teams and research reviewers, not transaction counsel. The article does not structure deals, advise on a transaction, contact parties or name actual targets. A vendor guide published on September 13, 2026 already covers the administrative steps of a novation package (www.capturepilot.com), so this report concentrates on a different decision: reconstructing a reviewable public-evidence history for one award under an explicitly checked version of the rules, with unavailable recognition documents left unknown. Unresolved items are treated as findings rather than gaps to be filled by assumption.

Terms used throughout:

- **Novation agreement:** the document by which the Government recognizes a successor in interest after a qualifying transfer of assets.
- **Change-of-name agreement:** the document recognizing a new name when rights and obligations are otherwise unaffected.
- **PIID:** Procurement Instrument Identifier, the unique identifier of a contract, agreement or order in the Federal Procurement Data System (FPDS).
- **UEI:** Unique Entity ID, the identifier generated in SAM.gov (System for Award Management).
- **CAGE code:** Commercial and Government Entity code, assigned through the Defense Logistics Agency (DLA).
- **Modification:** a recorded change to an award; FPDS and USAspending store each as a transaction.

Definition and Taxonomy: Corporate Events Versus Contract Events

Why the distinction matters

Federal law provides that the party given a contract or order may not transfer it, or any interest in it, to another party (www.law.cornell.edu). The statute separately permits assignment of amounts due under a contract to a financing institution (41 U.S.C. 6305), which is a payment-assignment question and not a transfer of the contract. The FAR operationalizes the exception: the Government may recognize a third party as successor in interest when its interest arises from a qualifying asset transfer (www.acquisition.gov). Recognition is a Government act. A press release, a website rebrand or a new recipient label in a database is a lead, not a recognition.

Four corporate event types

Each type below implies a different default question for the ledger. None is a conclusion about any specific award.

- **Name amendment:** the legal entity is unchanged and only its name changes. The sample change-of-name agreement recites that the amendment changes the corporate name only (www.acquisition.gov). A company that only changes its name is not treated as a successor in the FAR's offeror-predecessor provision (www.acquisition.gov).
- **Equity ownership change (stock purchase):** the contracting party is the same legal entity with new owners. Under the ordinary FAR, no novation is needed where there is no legal change in the contracting party and that party still controls the assets and performs (www.acquisition.gov). The same paragraph adds that ownership-change issues may still call for a formal agreement, so this branch is not "no action required" for every record.
- **Merger with a surviving entity:** whether the contracting party changed depends on which entity survives and on state-law effect. The ledger records the survivor and cites the filed instrument; it does not infer the answer from the announcement.
- **Asset transaction:** the contracting party's assets move to another entity. This is the pattern the successor-in-interest route addresses, and the FAR's list of qualifying transfers includes the entire portion of the assets involved in performing the contract.

What each outcome does not show

A recognized name change does not show a transfer of anything. A successor recognition covering listed contracts does not show a portfolio-wide transfer, because the request must include a list of the affected contracts with contract number and type, total dollar value as amended and approximate remaining unpaid balance (www.acquisition.gov). A stock deal with the same contracting party does not by itself show the status of every award, a point practitioners also make: stock deals that avoid novation can still trigger size rerepresentation and other post-closing steps (www.kslaw.com).

Governing Text Versions: Legacy FAR, Overhaul Text and Agency Deviations

Two numbering systems coexist

As of November 20, 2026, acquisition.gov hosts both the ordinary FAR and the overhaul guide. The ordinary page for Subpart 42.12 shows FAC 2026-01 with an effective date of 03/13/2026 (www.acquisition.gov). The overhaul guide for Part 42 places novation and change-of-name agreements at Subpart 42.9 (www.acquisition.gov), and its own cross-reference directs contract administration offices to process novation and change-of-name agreements under subpart 42.9. In that guide, Subpart 42.12 is relabeled small business contract administration (www.acquisition.gov).

The overhaul text is interim by design. A White House release of **June 25, 2026** said formal rulemaking began after agencies implemented the reforms through temporary deviations (www.whitehouse.gov) and that two more proposed-rule packages were planned (www.whitehouse.gov). A law-firm tracker reports a second set of proposed rules issued **September 18, 2026** (www.wiley.law). None of the sources fetched for this report shows a Part 42 proposed or final rule, so the status is "none found as of November 20, 2026", not "confirmed absent".

Agency adoption is document-specific

The deviation index lists 31 agency deviations for Part 42 (www.acquisition.gov). The NRC document is Class Deviation RFO-2025-42, dated December 11, 2025 (www.acquisition.gov), and runs until rescinded or incorporated into the FAR (www.acquisition.gov). The DoD deviation uses the same open-ended formulation and its DFARS (Defense FAR Supplement) text still points to the sample format at FAR 42.903(i) (www.acquisition.gov). NASA's deviation is effective as dated and remains in effect until implemented or rescinded, yet its supplement text still carries the heading for subpart 1842.12 novation and change-of-name agreements (www.acquisition.gov). Supplements can lag the base text.

A separate DFARS supplement page for Subpart 242.12 also exists, so whether a given DoD contract follows the legacy or the deviation text is therefore a contract-file question, not a calendar question.

Table 1 below records the edition crosswalk the ledger needs. It lists what was observed in this research, not which text governs any contract.

Item	Legacy FAR (ordinary text)	Overhaul / deviation text	Observed status (as of November 20, 2026)	Ledger field to fill
Novation subpart	Subpart 42.12, FAC 2026-01, effective 03/13/2026	Subpart 42.9	Both pages readable; the guide index shows 31 agency deviations for Part 42	Provision, edition, retrieval date
Successor recognition	42.1204	42.903 (title match only; DoD text cites FAR 42.903(i))	No fetched source states the section-level mapping	Crosswalk basis: stated or inferred
Name change	42.1205	42.904 (title match only)	Same: inferred from titles	Crosswalk basis

Item	Legacy FAR (ordinary text)	Overhaul / deviation text	Observed status (as of November 20, 2026)	Ledger field to fill
NRC	Not applicable	Class Deviation RFO-2025-42, December 11, 2025	In effect until rescinded or incorporated; later supersession not established	Agency, issuance and effective dates, supersession check
DoD	DFARS Subpart 242.12 (separate supplement page)	DoD deviation with DFARS 242.9 numbering	Open-ended effectiveness	Which text the contract cites
NASA	NFS heading 1842.12 retained	NASA deviation, effective as dated	Supplement numbering lags	Contract clauses and agency supplement

Two readings follow. First, the table shows why a bare clause number is not evidence: "42.12" can mean novation in one document and small business contract administration in another. Second, none of the rows tells a reviewer which text governs a hypothetical contract; the ledger requires the actual contract documents and the agency's adoption record to settle that.

The Evidence Ladder: From Announcement to Later Current Record

Rung by rung

The ladder orders evidence by how close it sits to the contract itself. A higher rung does not erase a lower one; each rung answers a different question, and a missing rung is recorded as a gap, never filled by inference.

- **Rung 0, announcement or press material:** shows an intended or completed corporate event. It names no affected awards.
- **Rung 1, filed identity instrument:** a state-authenticated name-change document or merger filing. For a name change, the FAR package includes the document effecting the change as authenticated by the state and counsel's opinion that it was properly effected (www.acquisition.gov).
- **Rung 2, registration record:** the SAM entity record. GSA stated that updates to legal business name and physical address are made through SAM.gov (content.govdelivery.com). The Entity Management API exposes a last-update field (open.gsa.gov), which supports dating the registration change but not the contract recognition.
- **Rung 3, government-recognized agreement:** an executed novation or change-of-name agreement. The FAR sample format is dated as of the date the transfer became effective under applicable State law (www.acquisition.gov), so the agreement date and the transaction effective date can differ. These agreements are often not public. DCMA's novation instruction points to a checklist for confirming a package is complete (www.dcma.mil), although the copy retrieved is dated March 20, 2014 (www.dcma.mil) and may predate current text.
- **Rung 4, executed modification identifying the award:** after distribution, the contracting officer prepares a modification summarizing the agreement and attaching a complete list of affected contracts (www.acquisition.gov). This is the first rung that ties an agreement to a specific award key.

- **Rung 5, FPDS action record:** FPDS offers separate reasons for modification, including "Novation Agreement" (fpds.gov) and a non-novation code for unique entity ID or legal business name change (fpds.gov). The reason code is a reported label, not the agreement.
- **Rung 6, later current record:** a subsequent USAspending or SAM state showing the successor as recipient.

Table 2 below pairs each rung with what it establishes and what it leaves open.

Rung	Typical public source	Establishes	Does not establish
0. Announcement	Company or press material	A corporate event was announced	Affected awards; recognition
1. Identity instrument	State filing; name-change document	Legal-entity change or survivor	Government recognition
2. Registration	SAM record and API fields (open.gsa.gov)	Registered legal name and dates on that record	Contract-level transfer
3. Agreement	Novation or change-of-name agreement	Recognition terms and effective date, if public	Public availability; which contracts unless listed
4. Modification	Contract modification with attached list	Affected award and effective date	Anything outside the list
5. FPDS action	Reason code and signed date (fpds.gov)	Reported action type and date signed	The underlying agreement text
6. Later current record	USAspending award summary (api.usaspending.gov)	Latest recorded recipient	When or whether recognition occurred

The interpretation matters for scoring. A successor label on rung 6 with no rung 3 or 4 evidence is a public-record observation. It supports a "public-record-mismatch" or "unresolved" outcome, not a "successor-supported" outcome. The statement that missing public recognition proves nothing about performance is equally important: absence of a public agreement is an access gap, not evidence that a contract cannot be performed.

Worked sequence for one award (procedure)

1. **Freeze identifiers.** Record the PIID, the referenced IDV PIID if any, the awarding agency code and each modification number. In FPDS, all modification numbers for a given identifier must be unique (fpds.gov), so PIID plus modification number identifies one transaction.
2. **Capture the recipient fields per transaction.** USAspending carries recipient name and UEI on each transaction row, plus ultimate-parent fields (www.usaspending.gov).
3. **Mark the corporate event type** using the taxonomy above and attach rung 0 and 1 evidence.
4. **Record the version.** Fill the edition crosswalk for the agency and the contract's clauses.
5. **Search for rungs 3 to 5.** Look for modifications with novation or name-change reason codes and read the modification description where available.
6. **Date each event separately** (recognition, name change, legal close, modification, system update).

7. **Assign an outcome** and list the open questions.

Identity and Data Plumbing: SAM, UEI, CAGE, FPDS and USAspending

UEI and registration

GSA announced that, as of **April 4, 2022**, the SAM.gov-generated Unique Entity ID became the authoritative identifier for entities doing business with the federal government (content.govdelivery.com), and that the DUNS Number was removed from the affected award systems (content.govdelivery.com). Records before that date carry DUNS-based identifiers, so a long-horizon history crosses an identifier boundary even without any corporate event. The federal spending data standard also distinguishes the legal entity name from trade names (fedspendingtransparency.github.io), and USAspending groups related recipients through parent fields (www.usaspending.gov).

GSA's forum FAQ says each SAM registration is assigned its own UEI (www.gsa.gov) and that an issued UEI does not expire (www.gsa.gov). The FSD.gov validation article says entity uniqueness is based on a combination of legal business name, physical address, start year and state of incorporation (www.fsd.gov). No fetched official page states outright whether a merger yields a new or retained UEI. The working inference, flagged as such in the ledger, is that a new legal entity or registration gets a new UEI and a name change on the same registration keeps it. FAR 52.204-13 supports the second half in part: it says a UEI change does not necessarily require a novation be accomplished (www.acquisition.gov).

An FPDS guidance document describes the practical consequence: in an FPDS modification, a novation searches on the new UEI, while a non-novation name change searches on the same UEI to refresh entity data from SAM (www.acquisition.gov). A new UEI on a later action is therefore consistent with a novation, but it is not proof of one.

CAGE codes, ownership fields and size status

After a legal business name update in SAM, a registrant with a CAGE code has its record sent to the DLA CAGE team for screening (www.fsd.gov). For the name change to proceed, the entity must state in writing whether open federal contracts exist under the previous name (www.fsd.gov). DLA publishes templates for novation agreements, **version 1.5** dated February 2026 (cage.dla.mil). For a GSA Schedule contract, the novation cover letter must state whether the UEI is changing (www.gsa.gov), and the transferee must confirm its SAM registrations are current and accurate (www.gsa.gov). SAM ownership fields, such as the highest-level owner CAGE code, are exposed by the Entity Management API (open.gsa.gov); law-firm guidance says an entity should generally update registration within 30 days of the effective date of an ownership change (www.goodwinlaw.com). That is practitioner guidance, not a FAR deadline.

Small-business status is a separate track that often generates its own contract modifications. Under the ordinary rule, a firm awarded a contract as a small business is generally considered small throughout the life of that contract (www.law.cornell.edu). Recertification of size and program status is required within **30 calendar days** of a merger, acquisition or sale (www.law.cornell.edu), and the FAR clause requires rerepresentation

within 30 days after a novation is executed (www.acquisition.gov) and after a merger or acquisition that does not require a novation (www.gsa.gov). Recertification does not change the terms and conditions of the award (13 CFR 125.12). A rerepresentation modification is therefore evidence of a size-status event, not of a transfer.

How the data systems record timing

- **Signature versus effective date.** FPDS defines Date Signed as the later of the contractor's and contracting officer's signature dates for a bilateral action (fpds.gov), and effective date as the starting date for the contract's requirements (fpds.gov). USAspending maps its action date to the date the action was issued or signed (www.usaspending.gov). A novation modification can thus carry a signed date months after the legal transaction date the agreement recites.
- **Reporting scope.** FAR 4.606 requires agencies to report modifications to reportable contract actions that change previously reported contract action data, regardless of dollar value (FAR 4.606).
- **Publication lag.** USAspending says contract data generally appear within about five days (www.usaspending.gov); DoD and Army Corps of Engineers procurement data are published on a 90-day delay (www.usaspending.gov), a delay FPDS also states for DoD data (www.fpds.gov). A Treasury information-flow diagram says SAM and FPDS data are reflected two days after they are finalized in the source systems (tfx.treasury.gov), and a GAO report describes a nightly update process (www.gao.gov).
- **Award identity key.** USAspending's generated award key for contracts combines the PIID, agency and referenced IDV elements, for example CONT_AWD_SPO50017F0039_1900_SGE50014D0009_1900 (github.com). Because the key contains no recipient element, a name or UEI change does not itself alter the key; a changed PIID or agency would.

Case Examples (Hypothetical Examples)

All names, identifiers and outcomes below are fictional and illustrate ledger logic only. No actual party, agency decision or transaction is implied.

Case A (Hypothetical Example): same-party stock transaction with missing corroboration

"Northgate Analytics LLC" announces a majority equity sale. Its award FICT-0001 shows the same UEI before and after, and no novation modification appears. Under the legacy text, a novation is unnecessary only if the contracting party is unchanged and still controls the assets and performs. Public data shows the same recipient, which fits that pattern, but the ledger lacks rung 1 evidence of entity continuity and any size rerepresentation modification. Outcome: **unresolved** until rung 1 evidence of entity continuity and any size rerepresentation modification are obtained, since practitioners note that stock deals can still trigger rerepresentation and registration changes (www.kslaw.com).

Case B (Hypothetical Example): asset successor with pending recognition

"Harbor Federal Services Inc" announces purchase of the performing assets behind award FICT-0002. A later FPDS transaction lists Harbor with a new UEI, but no modification text is public. The successor path requires an executed agreement and a modification attaching the affected-contract list. A new UEI is consistent with a

novation but is not proof. Outcome: **public-record-mismatch** if the label changed without rung 3 or 4 evidence, otherwise **unresolved**.

Case C (Hypothetical Example): name-only change

Award FICT-0003 shows a recipient renamed with the same UEI. The change-of-name agreement exists to recognize a new name when rights and obligations are unaffected. Outcome: **continuity-supported**, with the rename date recorded separately from any announcement. The predecessor name is retained in the ledger so older transactions still match.

Case D (Hypothetical Example): transfer affecting a subset of contracts

A transferor holds FICT-0004 and FICT-0005. The recognition package lists only FICT-0004 as an affected contract. Because the agreement's coverage is defined by the list of affected contracts, FICT-0005 stays with the transferor or is **unresolved**. Outcome for FICT-0004: **successor-supported for specified awards**; FICT-0005 is not inherited by assumption.

Case E (Hypothetical Example): public-record lag

A DoD award shows no modification after a reported closing. Publication can run on a 90-day delay for DoD data (www.usaspending.gov), so absence in the public feed is not evidence of absence in the contract file. Outcome: **unresolved**, with a re-check date recorded.

Table 3 below shows why a transferred award must not be counted twice. It is a fictional (Hypothetical Example) table.

Fictional award key	Transactions under predecessor label	Transactions under successor label	Naive count by recipient-name occurrence	Unique award count
FICT-0001	3	0	1 (predecessor)	1
FICT-0002	2	2	2 (one per name)	1
FICT-0003	1	2	2 (one per name)	1
FICT-0004	4	1	2 (one per name)	1
Total	10	5	**7**	**4**

The **naive count of 7** "wins" overstates the portfolio by 3 because three awards appear under both labels. Counting **unique award keys** gives 4. In this fictional sample, the unresolved succession share is the number of awards with an unresolved outcome divided by 4; if FICT-0002 is the only unresolved award, the share is 1 of 4, or 25%, and the denominator is always shown. The dollar columns are deliberately absent: action amounts are obligations, not recognized revenue or backlog.

Data Analysis and Evidence

What the quantitative record supports

The numbers that can be sourced in this domain are dates, windows and counts of documents, not business outcomes. They are collected in *Table 4* as a reference sheet; each row is a rule or system property, not a measure of any company.

Metric	Value	Source note
Ordinary FAR edition observed	FAC 2026-01, effective 03/13/2026	acquisition.gov page, November 20, 2026 (citation in Governing Text section)
Part 42 agency deviations listed	31	Guide index; not a count of adopters per contract
Contracting officer comment window on a proposed transfer	30 days after notification	Agency-side comment request, not a decision deadline
Size rerepresentation after novation or non-novated merger	30 days	FAR 52.219-28 (cited in Identity and Data Plumbing section)
Size and program recertification after merger, acquisition or sale	30 calendar days (www.law.cornell.edu)	13 CFR 125.12
Small status retained after qualifying recertification	Up to 5 years (www.law.cornell.edu)	13 CFR 125.12 text
USAspending contract data availability	About 5 days (www.usaspending.gov)	USAspending About the Data
DoD and Army Corps of Engineers publication delay	90 days (www.usaspending.gov)	USAspending About the Data
SAM registration validity	**365 days** (sam.gov)	SAM.gov alert, August 2025
Award-level outlays required	Since **FY22** (www.usaspending.gov)	USAspending data dictionary

Interpretation

The 30-day windows should not be confused with each other. The 30-day period in the contracting-officer procedure is a request for comments from affected offices after notification (www.acquisition.gov); it is not a statement about how long recognition takes. The 30-day period in the size rules is a contractor obligation after an event (www.law.cornell.edu). This report adopts no processing-time or success benchmark: the FAR text sets no such figure in the sources reviewed, and a vendor guide's own estimate of three to six months (www.capturepilot.com) is attributed to that vendor and is not used.

Dollar fields need equal care. USAspending defines Federal Action Obligation as the obligation, de-obligation or liability for one award transaction (www.usaspending.gov), and the potential total value as the amount that could be obligated if all options are exercised (www.usaspending.gov). An obligation is a promise to spend funds (www.usaspending.gov), and an outlay is money actually paid out (api.usaspending.gov). Award-level

outlay reporting before FY22 was optional and may be incomplete (www.usaspending.gov). None of these is recognized revenue or backlog. Funding and exposure math belongs in separate backlog and agency-concentration work, not in a succession ledger.

For a future, separately authorized sample, the ledger would report three denominators: unique awards (not recipient-name occurrences), awards with duplicated action histories, and awards with an unresolved succession outcome as a share of the unique-award total. No such sample was drawn here.

The Award Event Ledger: Fields and Outcomes

Fields

- **Award key:** the stable identifier, built from PIID, agency and referenced IDV elements (github.com).
- **Predecessor identifier and successor identifier:** UEI and legal name as recorded per transaction, plus the pre-April 2022 DUNS where relevant (content.govdelivery.com).
- **Event type:** name amendment, stock purchase, merger or asset transfer.
- **Affected contract or order:** the scope as listed in the recognition document or modification.
- **Dates, kept separate:** announcement, filing, recognition agreement, modification signed date (fpds.gov), effective date (fpds.gov) and system update date (open.gsa.gov).
- **Original excerpt or document and retrieval date:** raw text, not a summary.
- **Applicable version:** edition, agency deviation and supersession check from Table 1.
- **Reviewer outcome and open questions.**

Outcomes

- **Continuity-supported:** public evidence shows the same contracting party before and after the event (for example, an equity change with the same recipient and a name-change record).
- **Successor-supported for specified awards:** an executed agreement or modification names the award.
- **Historical-only:** the award supports a statement about the predecessor's past, not the current business.
- **Public-record-mismatch:** the recipient label changed without corroborating rung 3 or 4 evidence, or sources conflict.
- **Unresolved:** evidence is inaccessible or lagged.

An award is never moved from "unresolved" to "supported" on the strength of a recipient label alone. In USAspending, recipient name in the award summary is drawn from the latest transaction (api.usaspending.gov). Earlier transactions carry their own recipient fields as recorded (api.usaspending.gov); that earlier-names-persist reading is an inference from the transaction-level field structure, not an explicit official statement, and the ledger should be checked against the transaction download.

Questions to carry to counsel or authorized diligence

- Which agency text and which contract clauses govern each award, and has any deviation been rescinded or superseded?
- Did the transaction change the legal contracting party, and does the retained-assets-and-performance condition for a stock deal hold?
- Is there an executed recognition agreement, and which contracts does its list cover?
- Are facility clearance or foreign ownership questions pending, given that a change of ownership is a reportable changed condition (www.ecfr.gov) and that the National Industrial Security System is the system of record for facility clearance information (www.dcsa.mil)?
- Do size rerepresentation or recertification actions affect set-aside eligibility, given that a disqualifying recertification can make a concern ineligible to submit offers for set-aside or reserved awards after the triggering event (www.ecfr.gov)?
- Are there organizational conflict of interest questions, which practitioners advise starting early (www.morganlewis.com)?

The worksheet does not determine transaction legality or eligibility; those are questions for qualified counsel.

Implications and Future Directions

For origination screens. A recipient name is a join key of last resort. Joining on award key, with recipient and UEI as per-transaction attributes, avoids the three-award overcount shown in Table 3. Practitioner diligence guidance lists small-business status, which can change on a transaction (www.morganlewis.com), and size measurement across affiliates (www.morganlewis.com), as items that interact with contract history. That guidance supports adding a size-status column but does not change the succession logic.

For source monitoring. The text of Part 42 is in motion. The guide index shows an update date of **November 17, 2026** for Part 42, and the sources reviewed do not say what changed. Rulemaking is stated as the eventual path (www.whitehouse.gov), and a 2024 Federal Register notice recorded that any revisions to Subpart 42.12 would be made through rulemaking (www.federalregister.gov). A quarterly re-read of the edition crosswalk is a reasonable control, with each reading dated.

For data limits. Transaction timing can differ across systems by days or, for DoD, months (www.usaspending.gov). Any workflow that depends on a particular feed or search interface should be checked for current availability before each use.

For research practice. Recipient identity matching, including SAM and USAspending identity crosswalks and entity continuity, is a separate research task from contract succession, which is what this ledger addresses. No tool replaces the missing document: the executed agreement. Where the agreement is not public, the correct output is a documented unknown. Transition arrangements between signing and recognition are a deal-structuring matter that practitioners address with a transition services agreement (seyfarth.com); this report takes no position on them.

Frequently Asked Questions (FAQs)

How can analysts track federal contracts after an acquisition?

Start from one award key, freeze its identifiers, and follow the recipient and UEI recorded on each transaction. Separate the corporate event from the contract event and use the evidence ladder. Do not rely on the latest recipient label, which is drawn from the latest transaction (api.usaspending.gov).

What is the federal contract novation process, and does it differ for an asset purchase versus a stock purchase?

For an asset transfer, the contractor submits a request to the responsible contracting officer with the proposed agreement, a document describing the transaction and a list of affected contracts; the Government then decides whether recognition is in its interest. For a stock purchase with no legal change in the contracting party, the ordinary text says a novation agreement is unnecessary, but the exception is conditional and the text notes other issues may require a formal agreement. Practitioners add that a stock purchase typically does not require novation but other obligations remain (seyfarth.com).

What does FAR 42.12 require for a novation agreement?

The legacy subpart covers successor-in-interest recognition and name changes. Requirements include a list of affected contracts with contract number and type, dollar value as amended and remaining unpaid balance. Under the overhaul text, the corresponding subpart is 42.9. Check which text governs the contract.

Is the FAR 42.1204 clause number still the right citation?

Not always. The overhaul guide uses 42.903 and 42.904 for the matching topics, and some agency deviations adopt that numbering in their own documents, while some agency supplements still carry the older numbering. The section-level mapping is inferred from titles.

What is the diligence checklist for a federal contractor acquisition?

A public-evidence checklist covers the contract inventory by award key, entity type of the event, SAM registration and ownership fields (www.kslaw.com), size status (www.morganlewis.com), facility clearance and ownership questions (www.kslaw.com), and conflict-of-interest questions (www.morganlewis.com). Legal conclusions belong to counsel.

What happens to USAspending records and the UEI after a merger?

A new legal entity or registration gets its own UEI (www.gsa.gov); a name change on the same registration keeps it, per the inference described above. Earlier transactions keep the recipient fields as recorded, while award-level summaries show the latest (api.usaspending.gov). A UEI change must be reported to the contracting officer so the contract can be modified, and it does not necessarily require a novation.

What is a predecessor or successor in interest?

The FAR's offeror provision defines a successor as an entity that replaced a predecessor by acquiring assets under a new name, and states that a company that only changes its name is not a successor. A successor in interest to a Government contract is a party the Government has recognized after a qualifying transfer.

Conclusion

Tracking a federal award through an acquisition is a record-keeping discipline. The government-recognized contracting party and its dates, not an announcement or a recipient label, determine what an old award can support. The corporate event, the contract event and the data event each have their own sources, and the ordinary FAR and overhaul text, with agency deviations, coexist as of November 20, 2026. Treat clause numbers as edition-specific, record the agency and effective dates, and re-check supersession before characterizing an event.

Counting unique award keys prevents a transferred award from appearing as new wins. A continuity event does not establish contract expansion or sales growth, and obligations are not revenue. Where the executed agreement or modification is unavailable, the honest result is an explicit access gap with a named outcome: continuity-supported, successor-supported for specified awards, historical-only, public-record-mismatch or unresolved. Questions of legality, eligibility and transaction structure remain with counsel and authorized diligence.

For related research guides, see docket.capital/research.

Source links

Links cited in this article, in order of first appearance. Full addresses are provided for readers using extracted text.

1. https://www.law.cornell.edu/uscode/text/41/6305
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