



December 5, 2024

Mr. Erv Koehler
Assistant Commissioner
Office of General Supplies and Services
General Services Administration

Dear Mr. Koehler:

The Coalition for Government Procurement (Coalition) appreciates the opportunity to provide feedback to the General Services Administration (GSA) in response to the Request for Information (RFI) regarding publicly posting of Contractor Performance Information on GSA eCommerce and Digital Platforms.

By way of background, the Coalition is a non-profit association of firms selling commercial services, products, and solutions to the Federal Government. Our members collectively account for more than \$145 billion in Federal Government contracts including tens of billions of dollars of the sales generated through the GSA Multiple Award Schedules (MAS) program, VA Federal Supply Schedules (FSS), the Government-wide Acquisition Contracts (GWAC), and agency specific multiple award contracts (MAC). Coalition members include small, medium, and large businesses. We are proud to have worked with Government officials for more than 40 years towards the mutual goal of common-sense acquisition.

Coalition members share in GSA's goal of delivering best value mission support to customer agencies. While the Coalition has the following comments regarding publication of certain Contractor Performance information, we are dedicated to continuing to collaborate with GSA to improve MAS customer satisfaction.

The Proposed Metrics do not accurately reflect Contractor Performance

Cancellation Ratings

Members have expressed concern that the metrics used to evaluate contractor performance provide insufficient context for the maintenance of MAS contracts, and the metrics prioritize process over substance. Specifically, to assess cancellation performance, the current metric simply divides the total number of cancelled orders by the total number of orders placed within the evaluation period. This means that there is

no accounting for situations beyond the control of contractors. For example, if a customer cancels an order because they ordered the wrong part, decides they no longer want a part, or if they provide inaccurate credit card information, the contractor is penalized by the metric. Without accounting for context, the metrics can provide an inaccurate understanding of contractor performance.

To improve the metrics, GSA should include on-time delivery rate and backorder frequency with standardized definitions for consistency. Additionally, it is important to track supply chain disruptions and customer-driven delays that can skew data when evaluating contractor performance. To improve the data, GSA should implement a rolling 12-month period for metrics. This will ensure that prior data such as periods of inflation, COVID-19 or other supply chain disruptions will be phased out of the system.

Delivery Rates

In the development of metrics, each rating should have a clear definition to prevent misunderstandings. Metric ranges, rather than exact figures, reduces noise or irregularities in the data. Additionally, for many vendors, GSA Advantage sales only reflect a small portion of their MAS sales. As such, these vendors have expressed concern about the rating improperly reflecting their total performance within the MAS system or the Federal market. In response to these concerns, GSA should establish a structured dispute process, allowing contractors to contest inaccurate data within a set timeline, ideally with an accessible online submission system.

Shipment Status and On-time Performance

For shipment status and on-time performance, contractors are required to report the required information to GSA within three and seven days of the Purchase Order (PO) due date. This has led to situations where contractors are flagged not because of actual non-performance, but because they logged into the system and provided data outside of these timeframes. To avoid this issue, many contractors are expending significant resources to manage their performance information in the GSA site multiple times a month. For contractors under Transaction Data Reporting (TDR), this is particularly frustrating as it means that, for many vendors, they are not able to consolidate this reporting with their sales reporting obligations.

Increased Administrative Burdens and Complexities due to GSA Systems and Processes

Outdated Systems and Manual Processes

Many of GSA's systems underpinning the metrics and the evaluation of contractor performance are outdated, time consuming, and at times, incongruous with one another. Successfully maintaining a MAS contract requires interfacing with numerous GSA platforms. In comparison to commercial counterparts, GSA platforms do not provide the same flexibility and/or control to contractors. These differences contribute to significant variations in the amount of time that it can take to make changes. To illustrate, consider updating the delivery terms of a particular product. Commercially, this information can be changed in real time. For GSA contracts, however, that update traditionally involves two submissions - one via eMod and one via Schedule Input Platform (SIP)/Electronic Data Interchange (EDI) - and two separate approvals from GSA before the terms update online. Although the new Federal Acquisition Service (FAS) Catalog Platform (FCP) is intended to help address some of these delays, that system also requires a full compliance and price analysis to be processed for any change action, including a delivery terms update. This additional step requires additional time and resources. Under the circumstances, contractors are not able to make critical updates to their GSA solutions as quickly as they can commercially, which can significantly impact their ability to perform against the metrics.

In addition to timing issues, contractors also experience challenges associated with GSA's systems not talking succinctly to one another. For example, although GSA plans to update the order management services (OMS) portal's uniform resource location (URL), many vendors are still seeing the old, now broken hyperlink included on their FAS identification (ID) application dashboard pages (as of late October/early November 2024.)

Information available in GSA Systems Increasing Customer Cancellations

System limitations can also create problems beyond vendors' control. GSA's system divides all purchase order statuses into three categories—shipped, backordered, and cancelled. For example, if a warehouse inputs the commercial Electronic Data Interchange (EDI) response of "loading, ready to ship" the item must be entered as "backordered" to conform with the limitations of GSA's systems. Federal customers have responded by cancelling these orders because GSA's system leads them to,

mistakenly, believe that the product is not available. Notably, even if vendors are able to connect with the customer following the cancellation of these orders, there is no way to “resuscitate” these orders in the system. This means that a new order must be placed while the cancelled order remains included in the evaluation of contract performance.

Additionally, GSA’s system does not provide live inventory, leading to a higher percentage of cancelled orders as the customer is unable to see if the item is in stock. These systems issues are amplified/compounded by the complexity of the MAS program. For example, vendors are required to stock Ability One products. The lack of live inventory, compounded by the Ability One mandatory program, creates situations where contracting officers order large quantities of particular items that are then on backorder for a lengthy period. In this situation, the wholesaler is being penalized for a situation with GSA’s system that is outside of their control.

[Duplication of Contractor Performance Information that is already available through CPARS](#)

Publicly posting contractor performance metrics on GSA Advantage duplicates the functionality already available through the Contractor Performance Assessment Reporting System (CPARS). CPARS provides Federal customers with a web-based application for documenting contractor performance information and reviewing past performance prior to making award decisions. Notably, the CPARS procedure has substantial mechanisms built-in to ensure that contractors have a fair and reasonable opportunity to respond, and potentially refute, feedback provided by customers. Moreover, the system includes numerous safeguards to ensure that proprietary and sensitive information is protected from public release. It is unnecessary to duplicate the existing CPARS mechanism, but if GSA proceeds, it needs to include the protections and safeguards that the CPARS system offers for both customers and contractors.

GSA’s efforts to improve transparency around the public posting of contractor information are appreciated, but they should be approached with caution. The additional burden of engaging with GSA’s outdated, cumbersome systems imposes a considerable financial strain on members who now must spend additional manhours interfacing with these systems as well as developing their own processes for tracking this information. Members have expressed that sharing this performance information will lead to customer confusion as the customer looks outside the MAS platform to vendor’s websites where ratings and satisfaction are greater. In summary, GSA’s systems are not capable of accurately recording performance, nor are they remotely

commercial-like in terms of vendor adjustments to price, delivery terms, availability, etc. Finally, GSA needs to carefully consider whether government officials should be publicly rating commercial businesses in the manner proposed in the RFI. There is a reason CPARS data is not publicly available.

In sum, the Coalition recommends that FAS pause this effort until such time that the systems upon which FAS and its industry partners are dependent upon to monitor compliance are modernized to provide efficient, cost-effective contract management, consistent with FAS's mission of providing best value products, services, and solutions to meet customer agency mission requirements. A pause would reduce current management costs for both FAS and its industry partners, without jeopardizing the ability of the MAS program to meet customer agency requirements. Alternatively, given the Scorecard Initiative's increase in contract management costs impacting MAS contractors, especially small business contractors, FAS should address the increased costs by providing for equitable adjustments to contract pricing.

The Coalition would like to offer GSA the opportunity to discuss these issues further with all relevant parties and stakeholders at GSA as well as facilitate further dialogue between the Government and industry. Please feel free to reach out to me to discuss these issues and opportunities for future dialogue with members. I can be reached at RWaldron@thecgp.

Sincerely,

A handwritten signature in black ink, appearing to read "Roger Waldron", with a long horizontal flourish extending to the right.

Roger Waldron
President