



August 29, 2025

Federal Acquisition Regulatory Council
General Services Administration
Washington, D.C.

Subject: Comments on FAR Part 31 Deviation and associated guidance

Dear FAR Council,

The Coalition for Common Sense in Government Procurement (Coalition) appreciates the opportunity to comment on the General Services Administration's (GSA) Class Deviation and associated guidance concerning Federal Acquisition (FAR) Part 31 (Contract Cost Principles and Procedures).

By way of background, the Coalition for Common Sense in Government Procurement (Coalition) is a non-profit association of firms selling commercial services and products to the Federal Government. Our members include small, medium and large business concerns which collectively account for more than \$145 billion of the sales generated through the GSA Multiple Award Schedule (MAS) program. The Coalition is proud to have collaborated with Government officials for 45 years in promoting the mutual goal of common-sense acquisition.

The FAR currently requires documentation or receipts for travel costs exceeding \$75. FAR 31.205-46(a)(3)(iv). This amount was established in 1997 and has not been updated. 62 FR 64932. While we recognize the number was chosen based on federal travel regulations applicable to federal employees, the contractor thresholds do not necessarily need to be the same. We respectfully request that the threshold be raised to \$100 or more and that it be indexed for inflation. The risks associated with potential travel fraud are minimal considering the ease with which electronic commerce can now be audited. Further, the FAR needs to specifically **prohibit** the government from requesting receipts for expenses below the threshold. Such requests are time-consuming and waste contractor time and money, and these costs are ultimately passed on to the government through higher prices. Further we recommend that the receipt threshold be raised for other direct costs as well, and that the prohibition on requesting receipts for costs below the threshold also apply to other direct costs. This will save both the government and industry valuable time and money to focus on the mission.

The Coalition hopes you find these comments useful and thanks you for your time and consideration. If you have any questions, I may be reached at (202) 899-2986 ext. 129 or kdodds@thecgp.org.

Regards,

Kenneth Dodds
Executive Vice President & General Counsel