



U.S. General Services
Administration

RFO PART 8/GSAR 538.71

Updates to MAS Ordering Procedures

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Agenda

- Introduction
- Key Changes:
 - Quote and Evaluation Processes
 - Blanket Purchase Agreements (BPAs)
 - Removal of Open Market Items
 - Order-Level Materials
 - Contractor Use of MAS Contracts
- Key Features Maintained:
 - Small Business Set -Asides
 - Contractor Teaming Arrangements



Introduction

- Rewrite of Federal Supply Schedule (FSS) Ordering

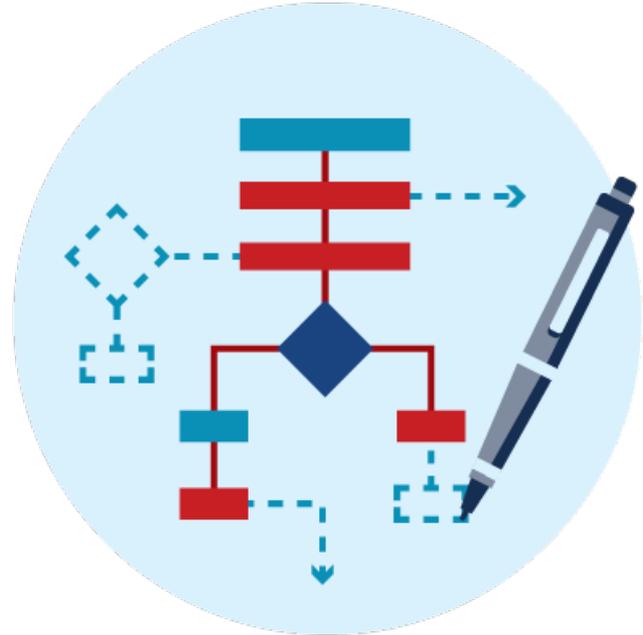
Procedures:

- Removes unnecessary complexity and duplication
- Embraces flexibility and innovation
- Eliminates duplicative FAR 8.4 guidance on contract administration:
 - Payment, order placement, inspection/acceptance, disputes, terminations
- Leverages existing FSS contract terms instead of repeating them



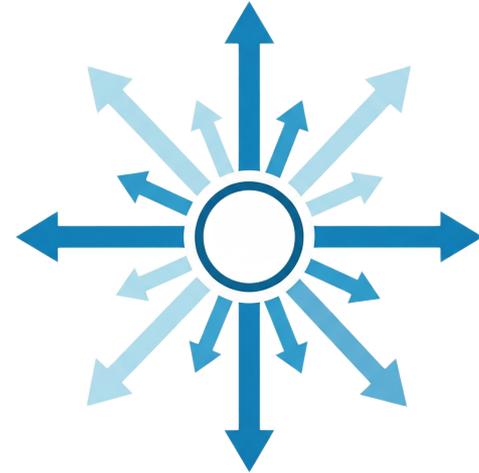
Key Changes: Quote and Evaluation Processes

- FAR Part 15 Processes Eliminated
 - No evaluation plans, scoring, or competitive ranges
 - Encourages innovative approaches ([GSAM 538.7102 -2](#))
- Best Value Emphasized
 - Agencies award to contractors that provide best value (per [FAR 2.101](#))
- Separate Supply vs. Service Procedures Eliminated



Key Changes: Blanket Purchase Agreements (BPAs)

- Must explicitly include scope, ordering period, invoicing/delivery/discounts, ordering authority/procedures, and any limits on ordering
- Annually confirm best value, price/discount opportunities, ordering procedures compliance, and FSS contract validity
- Eliminates Head of Contracting (HCA) approval of single award BPAs over \$100M (GSAM 538.7104 -1)



Key Changes: Removal of Open Market Items

Removes prior “open market item” guidance.



Key Changes: Order Level Materials (OLMs)

- Definition: Supplies/services added at the order level, not known at MAS contract award
 - Must be incidental and not the primary purpose of the order
 - Pricing evaluated by the ordering activity/ordering Contracting Officer
 - No longer has a percentage limitation
 - OLMs must not be the primary purpose of the task or delivery order. They are intended to support the main objective of the order.

OLMs: Policy Requirements

- Allowed on all order types (fixed -price, T&M, LH)
- OLMs must be clearly identified in the order
- Ordering Activities must follow GSAM 583.71 ordering procedures
- OLM authority: 41 U.S.C. § 152(3)



OLM Benefits

- Increases MAS flexibility for mission - focused solutions
- Reduces procurement/admin burden
- Eliminates need for duplicative IDIQs/open-market buys
- Promotes competition & cost savings
- Maintains compliance with MAS terms & FAR requirements



OLM SIN & Ordering Instructions

- OLMs require award of the OLM SIN
- Identified/defined at order or BPA level
- Pricing set at order level (ordering activity ensures fair & reasonable pricing)



OLMs & BPAs

- OLMs can be added to BPA orders if:
 - MAS contract includes OLM SIN.
 - Within scope of BPA.
 - OLMs must not alter the primary purpose of the BPA.

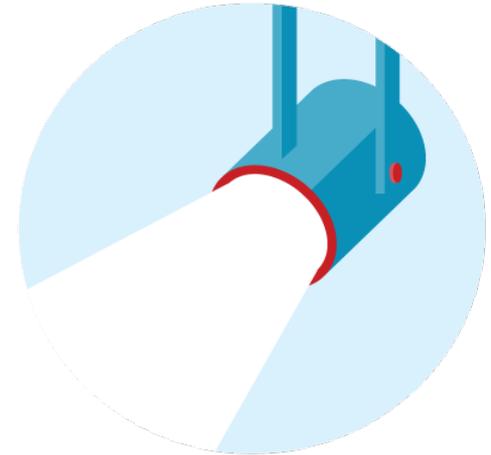


OLM Evaluation Checklist

- Is the order being placed against an authorized MAS contract?
- Has the contractor added the OLM SIN to their MAS contract?
- Is the order or BPA structured so that OLMs are not the preponderance of the work?
- If used, are costs applied correctly?
- Has the ordering activity made a fair and reasonable price determination for all OLMs using FAR 15.404 (RFO -2025 -15) techniques?
- Are travel costs, if included as OLMs, being properly administered and in compliance with applicable regulations?

Key Changes: Contractor Use of MAS Contracts

- MAS contractors may purchase from other MAS contracts
- Ensures transparency & compliance with FAR/GSAM
- Verifies compliance with FAR clauses, including TAA
- Reduces supply chain risk (by using pre-vetted sources)
- MAS contracts already include clause:
 - FAR 52.208 -90, Government Supply Sources (Nov 2025) (Deviation)



Contractor Use of MAS Contracts: Contractor Requirements

- Follow GSAM 538.7103 Ordering Procedures
- Maintain complete ordering files to support audit and compliance reviews
- Contractor's files must include:
 - Competition documentation or limited source justification
 - Any applicable price reasonableness determinations
 - All quotes & award documents
 - No double reporting sale or charging and remitting IFF — ever.



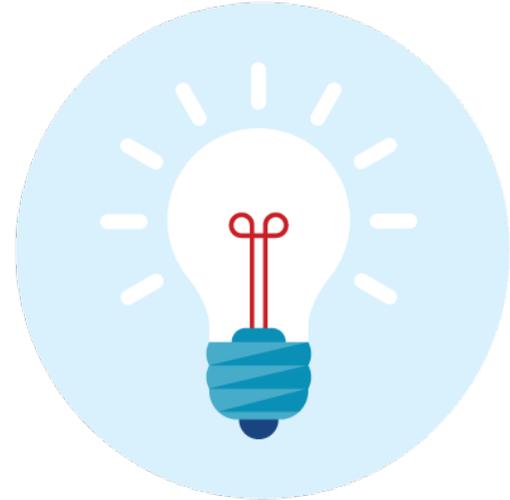
How to Utilize the New OLM and Contractor's Use of MAS Flexibilities

- Use OLMs or contractors ordering from MAS before considering any open market items
- OLMs and Contractors Using MAS = faster, compliant, within MAS
- Until MAS has added OLM SIN to each SIN, you should continue to use open market items when required.



Tips for Utilizing OLMs and Contractor Use of MAS Sources

- Ordering activities may restrict the use of OLMs in RFQs, but any exclusion must be clearly stated.
- Requesting pricing details with quotes is recommended to support price analysis.
- MAS contracts incorporated FAR 52.208 - 90, Government Supply Sources (Nov 2025) (Deviation), to allow contractor use of MAS and promote maximum competition at the order level.



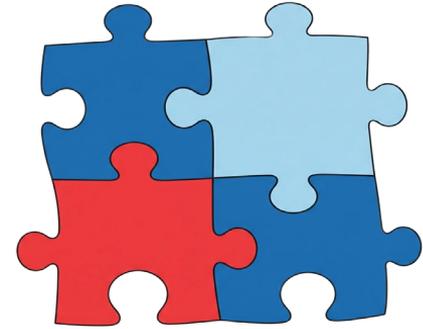
Key Features Maintained: Small Business Set -Asides

- Agencies can continue setting aside orders for small businesses
- Supports agencies in meeting small business contracting goals



Key Features Maintained: Contractor Team Arrangements (CTAs)

- Two or more MAS contractors partner under CTA
- Each is a prime for their portion
- May bill directly or invoice through a lead at MAS contract rates
- Different from prime -sub relationship



CTA Agreement: Requirements

- Must be in writing
- Define roles, deliverables, invoicing
- Include agreement in the order file
- Reference clause I -FSS-40 Contractor team arrangements)



Resources

- [RFO FAR Parts and Agency Deviations](#)
- [RFO FAR Part 8](#)
- [GSAR 538.71— Federal Supply Schedule Ordering Procedures](#)
- [MAS website \(www.gsa.gov/mas\)](http://www.gsa.gov/mas)



Thank You

- We appreciate your attendance and participation in today's session on Updates to MAS Ordering Procedures
- For Questions contact:
 - maspmo@gsa.gov
 - www.gsa.gov/mas
 - MAS Page on GSA Interact:
https://buy.gsa.gov/interact/community/6/activity_feed

