

# Imaging Equipment Committee Meeting

3/11/2026



**THE COALITION**  
FOR COMMON SENSE  
IN GOVERNMENT PROCUREMENT

# Agenda

## 1. GSA TDR Dialogue

**Greg Rollins**, Deputy Assistant Commissioner, Office of Policy and Compliance

**Steven Hutchinson** Chief of MAS Policy, Office of Policy and Compliance

**Paula Hance**, Procurement Analyst

## 2. Coalition Policy and Calendar Update

- Semiconductor and Memory Shortage
- RFO Moves to DFARs
- Cybersecurity Update
- Coalition Events



**Greg Rollins**, Deputy Assistant Commissioner, Office of Policy and Compliance

**Steven Hutchinson**, Chief of MAS Policy, Office of Policy and Compliance

**Paula Hance**, Procurement Analyst



U.S. General Services  
Administration

# Coalition for Government Procurement (CGP) Furniture Committee Transactional Data Reporting (TDR) Brief

03/11/2026

# Agenda

- **Transactional Data Reporting (TDR) Background**
  - Benefits
  - Use Cases
- **Expansion and Mandatory Participation**
  - Mandatory all TDR Special Item Numbers (SINs)
  - Timeline for mandatory reporting
- **TDR for Highly Configurable Products**
  - Changes based upon industry engagement
  - High level Overview of HCP offering and Reporting
  - Future Engagements
- **Current state Traditional vs. Future state TDR**

# TDR Background

- The Transactional Data Reporting (TDR) program is an alternative method of sales reporting for MAS contractors.
- TDR requires contractors to report transactional level data, including the price paid by federal buyers, for products and services purchased through the company's GSA Contract.
- This data provides the government with market intelligence to make smarter acquisitions and achieve taxpayer savings.



# Why is GSA using TDR?

To analyze actual line item sales & prices paid

## Right thing to do for taxpayers

- Reduces overhead & supply chain costs
- Supports supply chain risk management
- Enables analysis needed to get fair deals

## Good for industry partners

- Enables sharing of pricing insights with industry
- Cuts annual reporting costs by >\$3k per contract
- Allows meaningful analysis of pain points at scale

## Great for government

- Strengthens GSA's customer agency delivery
- Serves as a resource to GSA COs analyzing prices
- Enables sharing of pricing insights across government

# How GSA will use TDR data:

GSA will leverage your Transactional Data in a number of ways including:



# What data will be publicly available?

GSA will safeguard your data



Protected as trade secrets and commercial or financial information, which is privileged

Only aggregate data may be released



Only aggregate data (which does not include identifiable information) may be released

# Category-Specific Requirements

## Grace Period for Reporting

- Applies to **new entrants** added to TDR reporting
- Six-month grace period **begins** on the **effective date** of Participate in TDR mod.
- **Grace period** allows time to update reporting to align with TDR reporting requirements

GSA will “**meet you where you are**” during transition

Requirements may **evolve based on industry feedback**

## During grace period:

- Contractors expected to **upload supporting documents where required**
- Submissions not rejected for missing attachments
- If in FCP soft flags will show errors
- Validation errors will not be enforced



# TDR Use Cases

## Good for Government

### Business intelligence

Improves GSA's ability to use market intelligence to drive better acquisition outcomes GSA is working to improve AWF usage



### Better pricing

Pricing for TDR contracts is better than the prices of the contractors under the old regulatory compliance controls



## Good for Industry

### Reduced burden

Paperwork Reduction Act analysis shows the old model is twice as burdensome per contract



### Small business growth

Small businesses had higher sales growth than under the traditional program in certain areas

# TDR Use Cases: Saves Administrative Costs

Estimated **annual** savings  
per MAS contract:  
Industry - 22 hours/\$3,122  
Government - \$205.80

## *Realized Cost Savings*

Currently –

TDR-participating contracts:

3,358

Annual industry labor saved:

74k hours

Annual industry cost avoidance:

\$10.4M

Annual gov cost avoidance:

\$691k

Total annual savings *realized* under current  
scope:

**\$11.2M**

## *Optimal Savings*

Following TDR Expansion -

Total MAS contracts:

15,016

Optimal annual industry labor saved:

330k hours

Optimal annual ind. cost avoidance:

\$46.8M

Optimal annual gov cost avoidance: \$3M

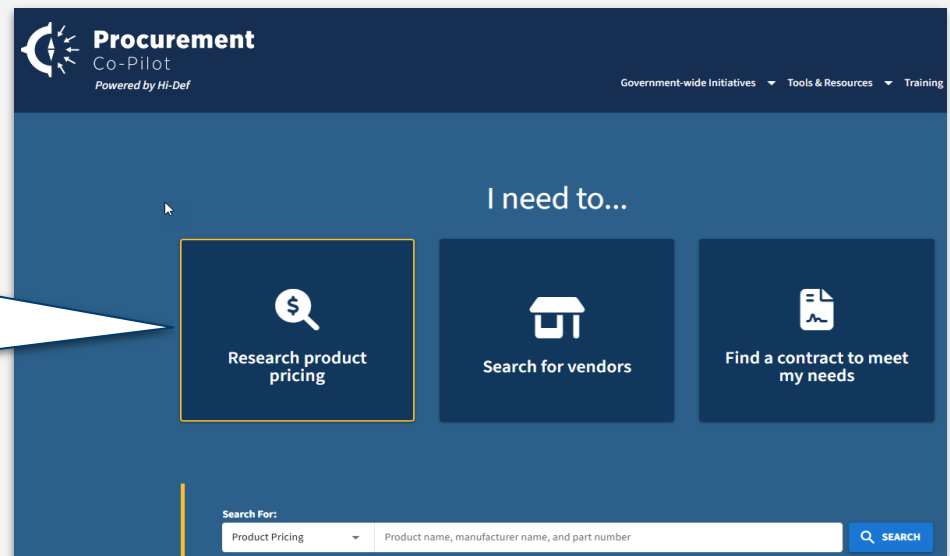
Total *optimal* annual savings post-  
expansion:

**\$50M**

# TDR Use Cases: Enables Governmentwide Price Analysis

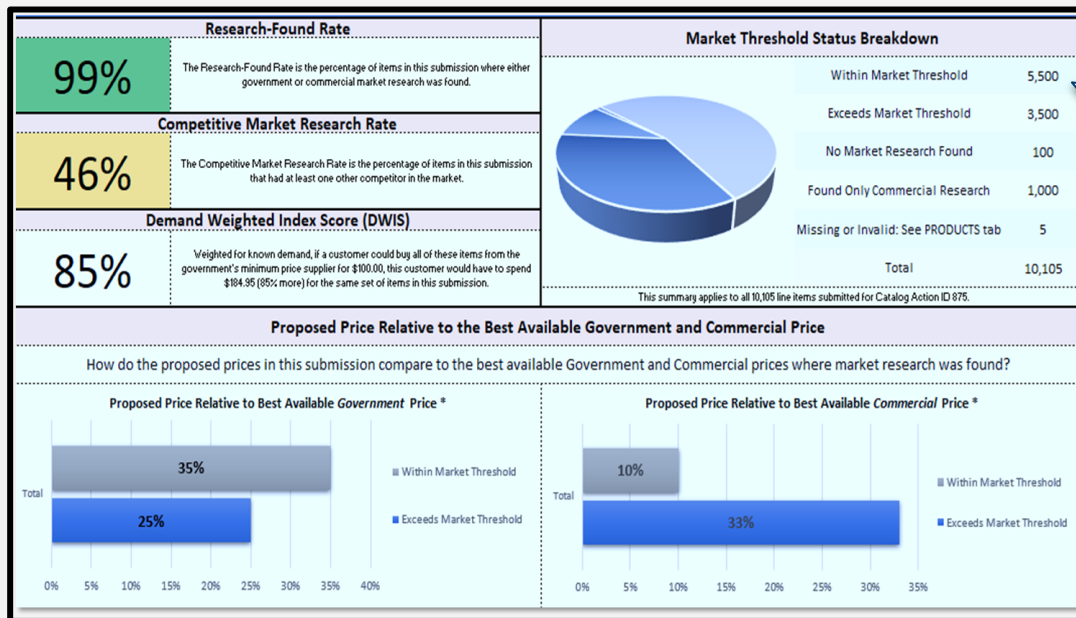
FAS provides 80% of the pricing data available via [Procurement Co-Pilot](#), a new tool that enables government analysis of actual prices paid

From JUN-1-2024 through today, Procurement Co-Pilot supported over **10k users** with access to gov-wide prices paid data for over **1.5M products**



# TDR Use Cases: Improves Competition

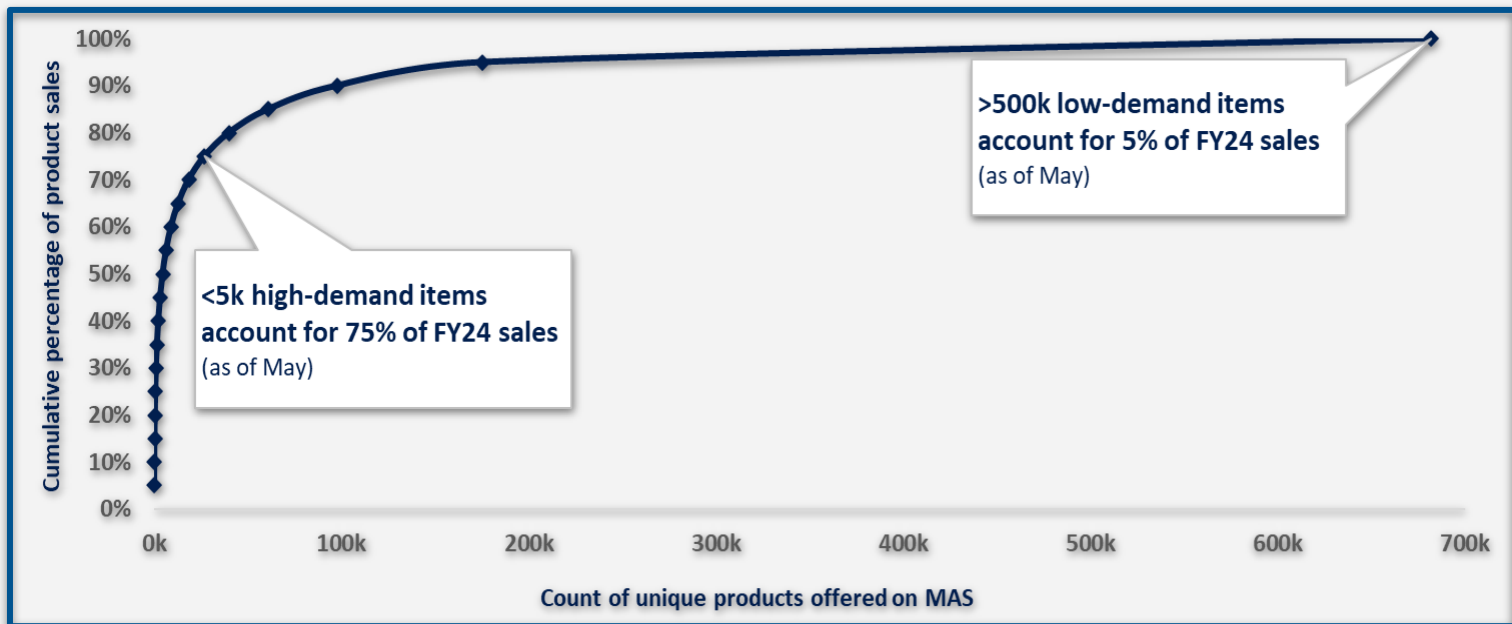
Sharing TDR data with contractors, empowering them to understand how they compare to other vendors & the commercial market to improve offer competitiveness



**Compliance & Pricing Report (C&P)** shows vendors how their offerings measure against market thresholds

# TDR Use Cases: Increases Transparency

Publicly posting TDR-informed demand data via [SSQ+](#) to empower industry to focus offerings on products with known demand



# TDR Use Cases: Mitigates National Security & Supply Chain Risk

## Analyzed TDR Data

Quickly identified a key vendor that sold nearly all identified products

## Alerting Customers

Informing agencies of supply chain risk

**Monitored CISA Alerts**  
Reviewed CISA alerts concerning product vulnerabilities

**Cross-Referenced Other Datasets**  
Identified agencies that purchased identified products



# What's in a Vendor's TDR SRP submission?

## Item information

- Special item number
- Description of deliverable
- Manufacturer name
- Manufacturer part number
- Unit of measure
- Universal product code
- **◆ UCID ◆**

## Buyer information

- Non-federal entity
- **◆ Federal customer ◆**

## Contract information

- Contract/BPA number
- Delivery/TO number/PIID

## Purchase information

- Quantity sold
- Price paid per unit
- Total price
- **◆ Order date ◆**
- **◆ Ship date ◆**
- **◆ ZIP code shipped to ◆**
- *Place of Performance*
- *Order Discount*

# TDR Contracts - Contract Administration

- TDR contractors are not required to:
  - Monitor price reduction violations in accordance with GSAR 552.238-81 May 2019, Price Reductions.
  - Provide Commercial Sales Practice (CSP) disclosures.
  - Provide Most Favored Customer (MFC) information.
  - Maintain the MFC/ Basis of Award (BOA) price discount relationship.
- Once in TDR, the entire contract (all SINs awarded) is subject to TDR terms and conditions for the remainder of the period of performance, including any option periods.
- EPA requests still require submission of Commercial Price List (CPL) /Market Rates in accordance with the current [Modification Guidance](#) on the [MAS Roadmap webpage](#).

# TDR Reduces Contract Administration Responsibilities

*TDR saves an average of 22 labor hours per contract annually*

Requirement	TDR	Legacy Pricing Disclosures
<b>Commercial Sales Practice</b>	<b>Not required</b> ★	Required for offers & certain mods; may be required when exercising options
<b>Most Favored Customer &amp; Basis of Award</b>	<b>Not required</b> ★	Required for offers & certain mods; must maintain price-discount relationship established upon award
<b>Price reduction violation tracking</b>	<b>Not required</b> ★	Must track & report price reduction violations
<b>Data reporting cadence</b>	Report elements <b>monthly</b>	Report total aggregate contract sales <b>quarterly</b>

# TDR-SRP Reporting Requirements Updates

- **SIN Categories summary (examples)**
  - Non Configurable Products
  - Highly Configurable Products
  - Cloud SIN
  - Configurable Services (other than Cloud SIN)
  - Professional Services
  - Service Contract Act (SCA)/Service Contract Labor Standards (SCLS) Services
- **Reporting Requirements Per Category**
  - Different requirements for reporting apply based upon the category

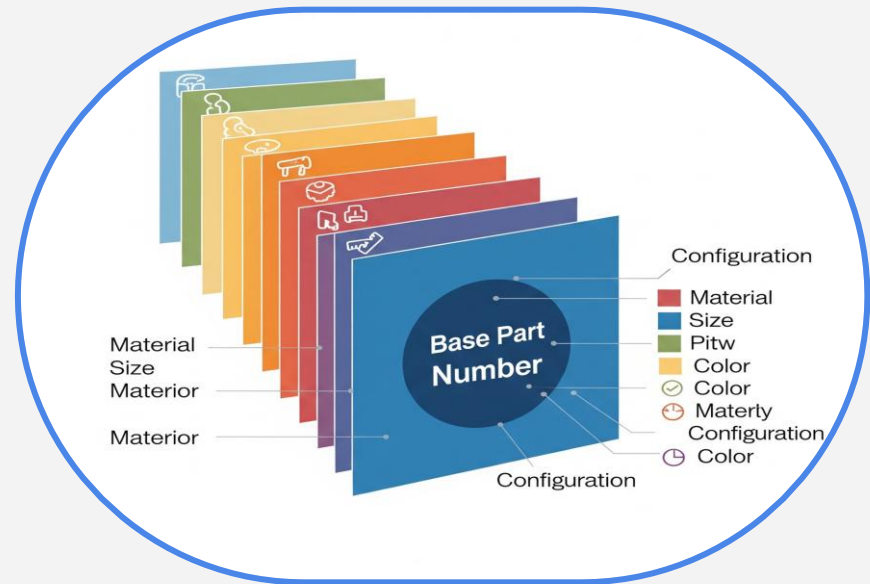
# Path A Benefits - Reporting by Manufacturer Name / Product Line

- Supports manufacturers' product lines
- Ideal for complex product families
- Offers comprehensive reporting details
- Facilitates detailed order tracking
- AI can be used to obtain data on what's being purchased and prices paid
- Government has information in one format



# Path B: Report by Base Model Part Number of Highly Configured Product

- Focuses on the base configuration
- Direct submission of the Manufacturing Part Number
- Streamlined data entry for customizable items
- Description provides details on configuration of highly configurable product
- Reduces complexity of Bill of Materials (BOM) reporting



## Using the Services Plus File for Highly Configurable Products

For vendors selling many configurations of the same product, listing every product configuration as its own line item is not feasible. In these situations, when the Products File and options would be exhaustive, the Services Plus File can be used.



### Overview

Most product vendors can list products with simple configurations in the FCP Product File, [using options](#) to list different choices (e.g., t-shirt size, chair fabric). When listing every product configuration as its own line item isn't possible and the existing GSA Advantage! options won't suffice, vendors may use the Services Plus File (SPF).

*Note: This exception should **not** be used when pricing is available at the line item level.*

### How to Use the SPF for Highly Configurable Products

To populate the SPF, use one of the two paths below, depending on whether a Base Model is involved.

Reminder: Contractors/offers must align how pricing is offered with how sales will be reported in the FAS Sales Reporting Portal (SRP) (see [FAS SRP User Guide](#) for details).



#### Path A: No Base Model: Product Line/Family/Series of Products

Vendors may offer a line, series, family, or "group" of products with a specified discount rate off an established, available pricing document such as a Commercial Price List or catalog. When filling out the SPF:

- **Commercial Price, MFC information, GSA Price without IFF, and GSA Price with IFF fields:** Leave all of these fields **blank**.
- **Unit of Issue:** Enter "10" for Group.
- **Discount offered to GSA off commercial price:** Enter percent as a decimal from 0 to 1, up to 4 decimal places (e.g. 10.55% is .1055).
  - When the pricing fields are left blank, the discount percentage is **automatically published** to the Price List and should be **inclusive** of the IFF to make it easier for customers to calculate their final price from the commercial catalog.
- **Title:** Provide a title that notes the line item covers a group of products.
- **Description:** Include all of the following:
  - Basic description of which products are included in the group and note that detailed product/service breakouts are available in the vendor's referenced pricing document (e.g., electronic catalog).

## Using the Services Plus File for Highly Configurable Products

- Title of the referenced pricing document, its effective date, and a statement that the document is available upon customer request for ordering.
- A statement that the configuration's final price is derived by applying the same published discount (inclusive of IFF) to all offerings within the group.

Example Description: This line item represents all configurations available in "Chair and Table Collection 2026" dated 1/1/26. The prices for all configured items are derived using the same discount off the commercial price inclusive of Industrial Funding Fee. The referenced pricelist will be made available upon request.

Note: In this "No Base Model" situation, SPF line items are awarded at a **fixed price calculated from the referenced pricing document on a specific date** (e.g. Commercial Catalog dated 1/1/26) and the discount offered to GSA. The awarded offerings and final GSA prices **cannot change without a modification**. Please remember to submit a new modification with a new pricing document and effective date if you wish to make adjustments.



#### Path B: Base Model: Base Model and Configurations

Vendors may offer a Base Model and its various configurations, with a specific discount off an established pricing document such as a Commercial Price List or catalog. When filling out the SPF:

- **Commercial Price, GSA Price without IFF, and GSA Price with IFF fields:** Provide pricing information for the Base Model.
- **Unit of Issue:** Enter the appropriate unit of issue for the Base Model.
- **Discount offered to GSA off commercial price:** Enter percent as a decimal from 0 to 1, up to 4 decimal places (e.g. 11.75% would be .1175).
  - For products with Base Model pricing, this percentage **will not be published** to the Price List and should be **exclusive** of IFF or calculations will not work.
- **Title:** Provide the Base Model title and note configurations are also available (e.g., Ergonomic Task Chair, Various fabrics and colors available).
- **Description:** Include all of the following:
  - Description of the base model with a note that more configurations are available in the vendor's referenced pricing document.
    - *Note: The pricing document should be the same document used to calculate the base model's final price.*
  - Title of the referenced pricing document, its effective date, and a statement that the document is available upon customer request for ordering.
  - Discount as a percent **inclusive of IFF** to make it easier for customers to calculate the final price. To calculate this discount inclusive of IFF from the discount exclusive of IFF:

## Using the Services Plus File for Highly Configurable Products

- Use the decimal you listed on the SPF as the discount\_offered\_to\_gsa\_off\_commercial\_price (exclusive IFF) and calculate as  $1 - ((1 - [\text{discount exclusive IFF as decimal}]) / .9925)$  to get the percent discount inclusive of IFF.
- Example: Discount exclusive IFF is 10% which is entered as ".1"  
Calculate inclusive IFF as:  $1 - ((1 - .1) / .9925) = 0.0932$  or a discount inclusive IFF of 9.32%
- A statement that explains the discount applies to all configurations from the established commercial document.

Example Description: Mid-back ergonomic task chair with reinforced nylon 5-star base. This line item represents all configurations available for the Base Model as represented in "Chair and Table Collection 2026" dated 1/1/26. The referenced catalog is available upon request. The prices for all configured items are derived using the same discount of 9.32% off the commercial price (includes Industrial Funding Fee).

You may opt to provide additional configurations as a separate line item with its own price and a separate unique catalog ID (UCID). If so, please remember to update the description to describe how that price is derived.

Note: The configurations are awarded at a **fixed price derived from the discount off a specified established pricing document on a specific date** (e.g., Commercial Catalog dated 1/1/26). The base model, the configurations, and final GSA price **can not change without a modification** that includes a new commercial pricing document.

### Listing Popular Configurations in the Product File for sale on GSA Advantage

Besides the two paths available above, you may choose to list the most popular configurations on the Product File for publication to GSA Advantage! as long as they aren't duplicated on the SPF and/or the pricing and terms match what is listed on the SPF. This would make these items available as click-to-buy products for customers.

For example, if you offer a product family at a 10% discount off the commercial price (inclusive of IFF) on the SPF, you can list certain popular configurations as separate line items in the Product File. If you choose to do this, these items **must** use the same 10% discount when calculating the GSA with IFF price for GSA Advantage!

Questions? Contact [Vendor.Support@gsa.gov](mailto:Vendor.Support@gsa.gov).

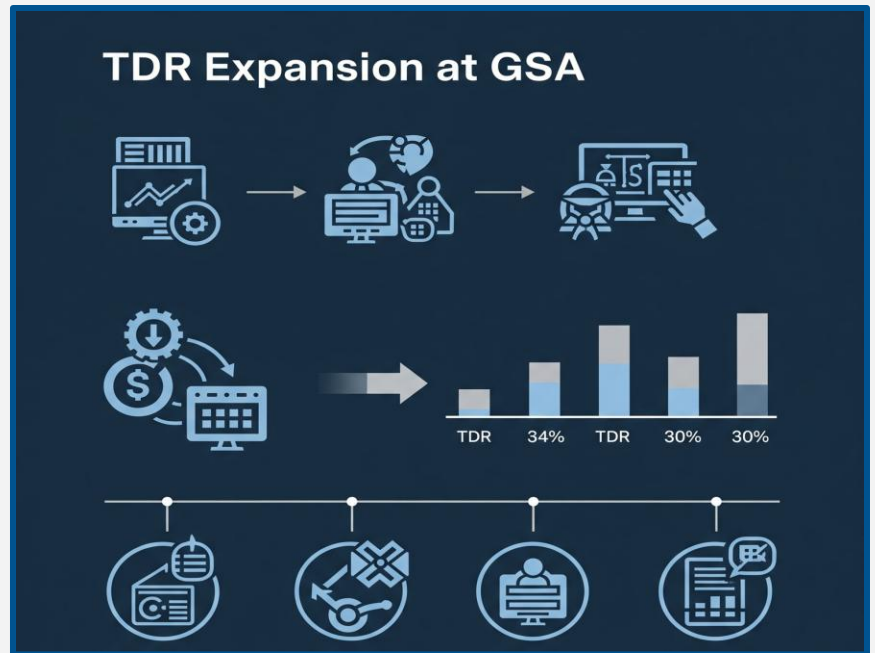
## Resources Highly Configurable Products

- [FCP Catalog Help](#)
  - FCP Services Plus File
- [Catalog Management Office Interact Page](#)
  - [Highly Configurable Products notice](#)
    - [HCP Infograph](#)



# Next Steps for TDR Implementation

- Attend / view MAS Office Hours on TDR Reporting on March 19 (focus on Services)
- Finalize TDR expansion in Refresh 31
- Accept Automated Opt in and Refresh Modifications
- Attend monthly TDR Office Hours





Thank You to GSA!



# Semiconductors and Memory Shortage

- Memory Chip Shortage

- The increased demand for computer memory for artificial intelligence has created a memory shortage due.
  - The Coalition has engaged with GSA on the need for timely price modifications to support competitive pricing for firms.
  - Joel Lundy, GSA Deputy Assistant Commissioner, Office of Category Management, will brief members on this issue as well as the OneGov Initiative on Tuesday, March 17, at CGI Federal 1000 N Glebe Road, Arlington, VA 22201.

- Semiconductor Proposed Rule

- The FAR Council published a proposed rule entitled "[Prohibition on Certain Semiconductor Products and Services](#)".
- The proposed rule amends the FAR to prohibit agencies from procuring "covered semiconductor products and services" including below the micro purchase threshold and to commercial procurements, including those for commercial off the shelf (COTS) products.
- Effective December 23, 2027.
- Comments due April 20, 2026.
- Email input to Greg Waldron at [gwaldron@thecgp.org](mailto:gwaldron@thecgp.org) by April 3, 2026.

## RFO Moves to DFARs

- The Revolutionary FAR Overhaul (RFO) is a review of the Federal Acquisition Regulation (FAR) removing most non-statutory rules and rewriting it in plain language.
- Now in Phase 2: Official rulemaking to codify previously published FAR deviations.
- Department of War (DoW) is updating the DFARS to align with the RFO and has published their first DFARS deviations [here](#).
- The DoW is [requesting feedback](#) from industry on the RFO and related changes to the DFARS.
  - Email comments to [osd.pentagon.ousd-a-s.mbx.dfars@mail.mil](mailto:osd.pentagon.ousd-a-s.mbx.dfars@mail.mil).

# Cybersecurity Update

CMMC Model		
	Model	Assessment
<b>LEVEL 3</b>	<b>134</b> requirements (110 from NIST SP 800-171 R2 plus 24 from NIST SP 800-172)	<ul style="list-style-type: none"> <li>DIBCAC certification assessment every 3 years</li> <li>Annual Affirmation</li> </ul>
<b>LEVEL 2</b>	<b>110</b> requirements aligned with NIST SP 800-171 R2	<ul style="list-style-type: none"> <li>C3PAO certification assessment every 3 years, or</li> <li>Self assessment every 3 years for select programs</li> <li>Annual Affirmation</li> </ul>
<b>LEVEL 1</b>	<b>15</b> requirements aligned with FAR 52.204-21	<ul style="list-style-type: none"> <li>Annual Self Assessment</li> <li>Annual Affirmation</li> </ul>

## FedRAMP

- FedRAMP 20x launched in March 2025 to streamline the authorization process.
  - Allows firms to skip agency authorization.
- Cloud services shifted from the Significant Change Request process to the new Significant Change Notification process. GSA to adopt this balance improvement release by the end of 2026.
  - In contrast to the significant change request process, the change notification process allows FedRAMP authorized providers to make changes without advance government approval.
- New consolidated rules in development and expected to be released in June 2026.
  - Public comments are posted [here](#).
- FedRAMP has one ongoing [RFC](#) on machine readable data standards.

## CMMC

- CMMC began implementation with Phase 1 on Nov. 10, 2025. During Phase 1, applicable solicitations require Level 1 or 2 self assessments.
  - Phase 2 will begin Nov. 10, 2026. Applicable solicitations will require Level 2 certification by a C3PAO.
  - DoD may require higher CMMC levels in select procurements.
- The SBA Office of Advocacy has [announced](#) a **virtual CMMC roundtable** on Thurs. March 12 from 1:00-3:00 PM EST.
  - SBA is seeking information on the cost of CMMC certification, the impact on small businesses, and program changes that would reduce CMMC compliance burdens.
  - Register [here](#).

## Coalition Events

- **Briefing on GSA's OneGov Initiative and Memory Chip Supply Challenges**
  - Joel Lundy, GSA Deputy Assistant Commissioner (Acting), Office of Category Management
  - To register, click [here](#).
- **FCP Dialogue with GSA Catalog Management Office: March 18 at 10 AM EST**
  - Peter Han, Director at the Catalog Management Office, Amanda Werb, Supervisory Data Analytics Specialist, and Paula Hance, Procurement Analyst.
  - To register, click [here](#).
- **Cyber & Supply Chain Security Committee Meeting: Cyber Update, April 8 at 12 PM**
  - Townsend Bourne, Partner at Sheppard Mullin, and Michael Gruden, Partner at Crowell & Moring.
  - To register, click [here](#).
- **Coalition Spring Training Conference, May 13-14, Falls Church, VA**
  - Agenda coming soon!
  - To register, click [here](#).

