



Multiple Award Schedule
Key Areas Impacting Compliance
Transparency When Making Consequential Decisions

1. Transparency regarding FAS evaluation of MAS contract compliance
 - a. Provide greater transparency to industry partners regarding FAS's primary compliance risk areas, evaluation methodologies, and automated monitoring tools.
 - i. How is FAS evaluating sales and pricing integrity? How is FAS utilizing TDR data, market prices, and commercial price lists?
 - ii. How is FAS evaluating scope of contract, SINs, and labor qualifications?
 - iii. How is FAS evaluating TAA, COO, and Section 889 compliance?
 - iv. How is FAS evaluating order management and responsiveness?
 - v. How is FAS assessing reporting accuracy and customer feedback?
 - b. Outline how GSA determines risk levels, validates data, and issues findings to contractors.
 - i. How does GSA use scorecards, CPARS, ETS notices, and other metrics?
 - ii. What opportunity is provided to contractors to address and improve upon findings?
 - c. Provide industry partners with a clear chain of command for making decisions regarding contract cancellations based on compliance findings.
 - d. Sharing these processes and practices will assist contractor compliance efforts to the benefit of GSA and customer agencies.
2. Role of Communication, Transparency, and Consistency
 - a. Provide industry partners with consistent, clear transparency throughout the offer intake, modification, and review processes.
 - i. Define clear handoff points in the process.
 - ii. Communicate to industry clear, consistent policy/contract interpretations.
 - iii. Share process timelines and system dependencies.
 - iv. Establish and share measurable performance metrics for the proposal/modification/negotiation process.

- b. Transparency supports effective oversight, reduces uncertainties, and promotes balanced, predictable, and efficient processes and practices for FAS and industry.
 - i. Increase AWF training for greater consistency in the contracting process--the timing of modifications, requests for contractor information, and the interpretations of guidance and regulations.
- 3. Data Integrity and Transparency - FAS's growing reliance on compliance and pricing tools/systems
 - a. Provide industry partners with transparency regarding data reconciliation of FAS system-generated output with contractor submitted market research and contractor certified data.
 - b. FAS is expanding its use of automated tools for ETS determinations, Section 889 enforcement, and for platforms such as FCP, CALC+, and CPRP.
 - i. How does FAS collect the data – what are the sources?
 - ii. How does FAS ensure the data is relevant, complete, and timely?
 - iii. How does FAS ensure the data accounts for market fluctuations?
 - iv. How does FAS validate the accuracy and relevance of data to a particular range of offers for contracts?
 - v. How does FAS collect information about platform issues to potentially address in system updates?
 - vi. How does FAS reconcile system data requirements/assessments with procurement policy requirements?
 - c. Transparency around FAS data management processes and practices would foster fair, balanced, and market-effective interactions between contracting officers and industry.
- 4. Contract size and the role of resellers
 - a. Provide industry partners with a clear understanding of GSA's expectations of contract size and business rationale for requesting reductions in number of items under contract.
 - i. What are the criteria for seeking or mandating industry partners to reduce the number of items on contract?
 - ii. What role do IOA reports, and other compliance assessments play in determining/adjusting number of items on contract?
 - iii. How does GSA assess items that are drop shipped versus in inventory via a contractor warehouse? Why does it matter? What role does price play?
 - b. Provide industry partners with a clear chain of command for making decisions regarding number of items on a contract and cancelling a contract.