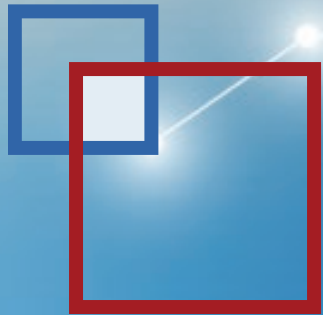




**THE
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GSA MAS Insights

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Subject Matter Expert**

June 23, 2026

Topics

- MAS Developments
- Compliance Updates
- Compliance & Best Practices for Maintaining MAS Contract
- Q&A

MAS Developments

- GSA reorganization - CREATE
- Solicitation refreshes & clause updates
 - AI
 - Joint Ventures
 - DEI
 - Holding modifications
- Transition to Transactional Data Reporting
 - Additional data elements
 - Grace period
 - Continuous changes / updates
- FAS Catalog Platform (FCP)
 - CO adoption / baseline delays
 - Catalog visibility
 - Pricing algorithm
- Central Intake Desk (CID) process
- Modification delays and rejections
- Stricter reviews during option extension
- Shifting guidance and policy application
- System challenges (eOffer/eMod/FCP/eSRS retirement)
- GSA data
 - Reliance on compliance and pricing tools
 - Timeliness and accuracy of information (real-time vs. system lags)
- Scope reviews
 - SIN Definitions with Customers
 - SME reviews / challenges
 - Labor Category Descriptions
- Negotiating pricing - increased focus
 - Pressures to get to “fair and reasonable”
- OIG involvement
- RFO releases

Compliance Updates

GSA is Assessing Compliance

- Monitoring for low or no sales
- Findings During Contract Assessment Reports
- GSA Internal automated monitoring tools
- Contractor Performance Assessment Reporting System (CPARS)
- SAM.gov / Subcontracting Reports
- Order management and responsiveness
- Data and supply chain risk
- Reporting accuracy
- Customer or OEM feedback / complaints

Performance Risk Tolerance

- Subjective / Varies – CO has the discretion
- Issuance Letters of Concern / Corrective Action Plans / Cancellation Notices
- Degree of Risk / Frequency of Occurrences
- Rightsizing and Portfolio Adjustments

Critical Factor: Readiness of Compliance Controls and Supporting Evidence

- Prompt Response to CO communication
- Proper Compliance Controls
- Document and Implement
- Proactive Data Validation and Cross Checking
- Knowing when to Request for underlying data / Validate findings / Challenge discrepancies before they escalate

Compliance & Best Practices for Maintaining MAS Contracts

- Know your terms and conditions along with what's awarded on your MAS contract.
- Meet minimum sales thresholds to retain contract.
- Submit accurate and timely sales reports and remit IFF correctly.
- Maintain and update GSA Advantage listings.
- Ensure pricing is at or below approved levels; offer only compliant products/services.
- Monitor labor qualifications, delivery schedules, and order responsiveness.
- Track Small Business Subcontracting Plan requirements (if applicable).
- Maintain strong internal compliance program and documentation readiness.
- Segregate GSA/VA sales and follow proper quote/invoice procedures.
- Submit timely modifications (FCP submissions, admin, additions, deletions, EPA, novations).
- Engage on GSA platforms (eBuy, Interact) and actively pursue sales.
- Retain documentation and ensure compliance with ETS, TAA, and labor standards.

Questions? Contact:



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The Gormley Group (TGG) is the leading GSA and VA Schedule contract consulting firm. We drive growth within your company by offering a hands-on approach to obtaining and maintaining your GSA or VA Schedule Contract(s). We are proud that over 73% of our business are referrals which come from all areas of industry and government. We help small and large companies increase revenue and maximize resources in the government market. We also mitigate risk by ensuring compliance policies and programs are in place to enhance contract conformance.

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Contract Duplication Survey

- The Coalition has launched a survey on the impacts of duplicative Federal contracts. Specifically, contracts for the same or similar products or services across the government. The purpose of the survey is to gather member feedback on the costs associated with contract duplication, including bid and proposal expenses, contract management costs, and other administrative burdens.
- The Coalition will use survey responses to develop a report on the costs and prevalence of having duplicative contracts available for the same products and services across the government. The report will be shared with government officials at GSA, the Department of War, the Office of Federal Procurement Policy (OFPP), and other agencies involved in current efforts to consolidate contracting programs governmentwide.
- Members are encouraged to participate. Survey responses will be treated as non-attributable, and individual company information will not be shared with the Government.
- Access the survey [here](#). If you have any questions, please contact Michael Hanafin at mhanafin@thecgp.org.

Coalition Comment Calendar

Topic	Relevant Documents	Due Date	POC
Mitigating Risks Related to Foreign Ownership, Control, or Influence.	The DFARS proposed rule	June 23, 12:00 PM EST to the CGP	gwaldron@thecgp.org
RFO Parts 6, 7, 10, 18, 26, 37, & 41	The Proposed Rule	July 7, 5:00 PM EST to the CGP	gwaldron@thecgp.org
RFO Parts 3, 49 & 52	The Proposed Rule	July 7, 5:00 PM EST to the CGP	gwaldron@thecgp.org
RFO Parts 5, 24, 29, 52	The Proposed Rule	July 7, 5:00 PM EST to the CGP	gwaldron@thecgp.org
RFO Parts 1, 2, 4, 33, 39, 40, 52, & 53	The Proposed Rule	July 7, 5:00 PM EST to the CGP	gwaldron@thecgp.org
GSAR AI Clause	The GSAR Proposed Rule	July 17, 5:00 PM EST to the CGP	gwaldron@thecgp.org

Upcoming Events

- **Healthcare Committee Briefing with GAO on VA Acquisition, July 8, 11 AM**
 - Virtual
 - To register, click [here](#).
- **All-Member Briefing with GAO on DoW's Use of OTAs, July 21, 11 AM**
 - To register, click [here](#).
- **Joseph P. Caggiano Memorial Golf Tournament, August 19**
 - To register, click [here](#).
- **Save the Date: Fall Training Conference, November 18-19**

Thank you

