August 12, 2026

Jeff Koses
Senior Procurement Executive
General Services Administration
1800 F Street, NW
Washington, DC 20006

Subject: Evergreen Federal Supply Schedule Contracting

Dear Mr. Koses:

The Coalition for Common Sense in Government Procurement (Coalition) is writing to you to urge the General Services Administration (GSA) to take action to maximize the benefits of the Revolutionary Federal Acquisition Regulation (FAR) Overhaul (RFO) and the new Federal Supply Schedule (FSS) ordering procedures. Unfortunately, the reforms have had the unintended consequence of making performance under the FSS program more burdensome and costly for both Government and industry. Now is the time for GSA to make the FSS program "evergreen."

By way of background, the Coalition is a non-profit association of firms selling commercial products and services to the Federal Government. In Fiscal Year 2025, our members collectively delivered over $170 billion in commercial goods and services to the Federal Government. These members include small, medium, and large business concerns. The Coalition is proud to have collaborated with Government officials for more than 45 years promoting the mutual goal of common-sense acquisition.

As an initial matter, the Coalition supports the RFO as common sense procurement reform that will streamline the acquisition process, reduce administrative burdens, and promote commercial item contracting. In particular, the rewritten FSS competitive ordering procedures and their placement in the General Services Acquisition Regulation (GSAR) is a major step towards increasing the efficiency and effectiveness of the FSS program.

The new FSS ordering procedures are written in a plain English, reducing complexity and providing a clear, concise roadmap for the competitive placement of orders. It is especially positive that for FSS Blanket Purchase Agreements (BPAs), the new regulations provide greater flexibility for single award BPAs while no longer limiting BPA duration to five years. These two changes will enhance the ability of customer agencies to leverage and compete mission requirements over time.

However, while the RFO has reformed the FSS BPA ordering procedures, the underlying FSS operational policy has not kept pace. For example, under the new FSS ordering procedures, customer agencies can compete and award 10-year BPAs. At the same time, the BPA time limitations set forth on GSA's website provide that an agency can award a BPA that extends beyond the current term of the underlying contract "**only if there are option periods on a contractor's MAS contract available to cover the BPA's period of performance."** This means that a firm that is in the 11th year of its 20-year FSS contract cannot compete for a 10-year BPA, without having to submit a new offer and be awarded a new FSS contract to cover the entire period of the BPA. This is more work and cost for both industry and GSA, with no discernable benefit.

This disconnect has real and costly operational impacts. It increases administrative costs and creates barriers to entry for offerors and contractors by transforming 20-year contracts into 10-year contracts. It also negatively impacts customer agencies by limiting access to only those contractors who have more than 10 years left on their contracts. The resulting unintended consequences are reduced competition and higher costs.

It does not have to be that way. The Administrator of GSA has statutory authority for the establishment of the policies and procedures governing the FSS program. See generally the Federal Property and Administrative Services Act of 1949; see also the definition of competitive procedures under the Competition in Contracting Act. The statutory authority for the FSS program does not, in any way, dictate the number of years that an FSS contract can run, the number of years in a base term or option periods, or the number of option periods that an FSS contract can have. The statute simply provides that the FSS procedures created by the GSA Administrator are considered competitive procedures if participation is open to all responsible sources and awards under the FSS result in the lowest overall cost alternative to meet the needs of the Federal Government.

In sum, the GSA Administrator has the authority to adopt "evergreen" contracting for the FSS program thereby eliminating the disconnect between the FSS BPA ordering procedures and GSA's operational guidance. More than 50% of the dollars flowing through the FSS program are spent under BPAs. Making the FSS program evergreen and eliminating the requirement to submit and process new offers and negotiate entirely new contracts will reduce costs, increase competition and provide more effective and efficient management of Government and industry resources, time, and money.

Finally, each day that passes puts additional stress on more FSS contractors. These contractors are finding themselves in a no-win situation. With their contracts terms effectively shortened, they must invest scarce bid and proposal resources in seeking a new FSS contract well ahead of schedule (up to 10 years early) or forego long term business opportunities of customer agency 10-year BPAs. GSA today has the authority and ability to positively address this policy and contractual disconnect.

Thank you for your time and consideration. If you have any questions, I may be reached at rwaldron@thecgp.org.

Regards,

Roger Waldron
President

Cc: Laura Stanton, Acting Commissioner of the Federal Acquisition Service, GSA