



TRANSACTIONAL DATA REPORTING (TDR) FINAL RULE
EXTERNAL Q&A DOCUMENT
JUNE 22nd, 2016- FINAL

I. Background and Pilot Overview

Q1. Why is GSA implementing transactional data reporting?

- A. Each year, the Federal Government acquires goods and services worth hundreds of billions in dollars through millions of individual transactions conducted by thousands of contracting units across hundreds of federal agencies and commissions. For example, in FY14 the federal government spent \$420 billion on products and services, acquisitions performed by over 500 different buying entities.

Most buying offices operate independently, conducting procurements without regard to the experiences of their counterparts. Functions such as industry outreach, market research, requirements development, negotiations, and contract award are repetitively performed, without coordination, across the acquisition landscape. Best practices are formed in siloes and lessons learned are shared narrowly, forcing the workforce to face timeworn challenges without the benefit of collective wisdom. The federal government and its industry partners cannot afford to continue to function in this disparate environment and with this much redundancy.

In response to this problem, the Office of Management & Budget (OMB) has organized and is in the midst of implementing a government-wide solution called category management. Category management is the process of managing product or service categories as strategic business units and customizing them to meet customers' needs. In order to be successful, federal agencies and category managers need new insight into both federal and commercial markets. Intelligence like transactional data is a crucial requirement to help the government understand what it buys and how to buy it smarter. Significant savings can be achieved through demand management and competition, which can be passed on directly to the American taxpayer.

Q2. What changed between the proposed rule (issued in 2015) and the final rule?

- A. GSA took extensive steps in receiving and carefully considering all stakeholder feedback in drafting and issuing the final rule. In Spring 2015, GSA held the first public meeting on a GSA acquisition regulation in over 20 years. Nearly 200 companies, organizations, government agencies and interest groups were represented and 11 presentations were made. GSA received 26 comment letters in response to the proposed rule and held two rounds of public comment on the Commercial Sales Practice (CSP) and Price Reduction Clause (PRC) burden estimates before issuing the final TDR rule. GSA made a number of



changes based upon stakeholder comments before issuing the final rule. Below provides the list of major changes:

- Reduced Burden:
 - In the final rule, FSS vendors will no longer provide CSP disclosures for contracts subject to the new Transactional Data Reporting clause, 552.238-74 Alternate I. The proposed rule did not remove CSP disclosures.
- Revised Burden Estimates:
 - TDR burden estimates are more than 5 times higher per contractor per year than what was outlined in the original proposed rule.
 - GSA increased the burden estimates of the Commercial Sales Practice (CSP) and Price Reduction Clause (PRC) from \$90.1M to \$101.7M a year, or by 13%, after receiving comments on its second notice.
- Data Reporting and Fee Remittance Timelines:
 - Increased the time to report from 15 days after the month to 30 days for the previous month’s transactions.
- Clause Language:
 - GSA made several revisions to the clause language for 552.216-75 and 552.238-74 Alternate I, to additional management controls, such as obtaining GSA’s Senior Procurement Executive approval, before adding a data element.

Q3. What will occur between the rule being published and FAS’s implementation of the rule?

- A. Once the TDR rule is published, FAS will execute its implementation plan, which includes robust training for both the acquisition workforce and industry partners, the deployment of communications materials and resources, and system modifications.

Q4. When will TDR be implemented?

- A. The pilot program will be implemented in a phased approach for the impacted Schedules/SINs beginning in Summer 2016.

Q5. What are the pilot schedules and SINs?

- A. TDR will be implemented in a phased pilot approach with several Schedules and Special Item Numbers (SINs), beginning August 2016 and extending through quarter 1 FY 2017. The preliminary Schedules are (in rollout order):

Schedule	Description	SINs	Offerings
58 I	Professional Audio/Video	All	Products
72	Furnishings & Floor Coverings	All	Products



03FAC	Facilities Maintenance & Management	All	Services
51V	Hardware Superstore	All	Products
75	Office Products/Supplies	All	Products
73	Food Service, Hospitality, Cleaning Equipment	All	Products
70	Information Technology	132-54 132-55	Satellite Services
		132-32 132-33 132-34	Software
		132-8	Hardware
00CORP	Professional Services Schedule (PSS)	Professional Engineering Services SINS	Services

Q6. Why were these Schedules/SINs chosen for the pilot?

- A. GSA aimed to select the right mix of both products and services across a wide range of industries to serve as a representative sample. The broad sample will test the rule so it can be applied to all MAS contracts in the future.

Q7. What if my Schedule 70/PSS contract has some SINS that are affected by the pilot and other SINS that are not part of the pilot?

- A. If your contract has one or more SINS included in the pilot all sales reporting for that contract will be through the TDR platform - including those SINS that are not listed in Q3.

Q8. How will GSA implement TDR as a pilot?

- A. GSA’s pilot will be limited to a defined subset of Schedules where we can most effectively test the effectiveness and results of implementing TDR. GSA will not expand implementation of this requirement beyond the pilot until initial results are fully assessed and a determination is made that expanding is in the best interest of our partner agencies and the taxpayer. In the event the pilot does not meet our expectations, we can turn back to the current practices of using the PRC and CSP to safeguard what the government is paying for goods and services. GSA has established clear policy, effective training, and user-friendly tools to ensure successful implementation. In addition, GSA will conduct change management and



knowledge-sharing activities with category managers, GSA COs, and federal buyers to fully harness the power of the transactional data collected through the pilot.

Initially, any new offer on the pilot Schedules will be required to agree to the TDR requirement. GSA will invite existing contractors to accept the TDR requirement, which removes the CSP and PRC requirements. GSA may require existing contractors to accept the TDR requirement over time.

Q9. How are TDR and the Formatted Product Tool (FPT) related?

- A. TDR is a pilot program that changes the way that contractors report their sales. FPT (Formatted Product Tool) is a pilot program tool that changes the way contractors upload their listings to *GSA Advantage!*. Some contractors may be involved in the pilot programs for implementation of both TDR and FPT.

Q10. How will the pilot's success be determined?

- A. We will be monitoring the rule's impact on sales volume, pricing, competition level and socioeconomic goals. A successful pilot will not adversely impact competition on Schedule and will not negatively impact the federal agencies' ability to meet their socioeconomic goals.

Q11. How long is the pilot scheduled to run?

- A. Approximately 3 years.

Q12. Will more SINS be added to the pilot during its expected duration?

- A. Current plans call for a 3-year pilot affecting specific SINS (see question 5) at which point the pilot will be reassessed. Any changes to the scope or duration of the pilot would be clearly communicated to stakeholders.

Q13. If I am part of the pilot, but also have items on a Schedule that is not one of the pilot Schedules, can I opt in to using TDR on my non-pilot Schedule?

- A. No

Q14. How will I get information and training on what is expected of me?

- A. Training will be provided via live webinars. Webinar recordings will be available for on-demand viewing from the Vendor Support Center website (<http://vsc.gsa.gov>).

Q15. How will GSA use the data, and who can see my data?

- A. TDR data will be used to support category management & promote smarter buying. It will be used to save money and pass on savings to the taxpayer, reduce contractor and contracting officer burden, and increase transparency into federal acquisition. The



ultimate goal is to be a proactive federal partner in giving our customers the information they need to make the best buying decisions possible, while simultaneously lowering the barriers for businesses entering the market.

The initial focus of TDR implementation is collecting the data. After sufficient data collection has been determined, the data will be made available to both internal and external stakeholders, which will be communicated appropriately at such time. Dashboard tools are being developed which will allow the data to be shared while protecting sensitive or proprietary vendor information.

II. Modification Acceptance

Q16. What happens if I do not accept the modification?

- A. You may continue to report using 72A. Accepting the modification and transitioning to reporting through TDR is mandatory before an option period will be exercised on your contract

Q17. What is the timeline for accepting the modification?

- A. Contractors have 90 days to accept the modification after the mass refresh.

III. Reporting

Q18. Will I have to report anything retroactively before the start date of implementation?

- A. No. The data is to be reported moving forward.

Q19. Can I change reporting formats month to month? Can I change from form entry to file upload to save time?

- A. Yes, you can change reporting methods month to month.

Q20. Currently GSA sends courtesy reminder notices when it is time to report sales and remit IFF. Will this continue once I transition to reporting monthly through TDR?

- A. Yes, GSA intends to send courtesy reminder notices to contractors regarding sales reporting and IFF remittance on a monthly basis to TDR contractors, and on a quarterly basis for 72A contractors.

Q21. When will I transition from reporting on the 72A system to reporting through TDR system?

- A. The reporting requirements will become effective on the first day of the business quarter following acceptance of the modification, i.e., April 1, July 1, October 1, or January 1. See the below chart:



If Mass Mod A509 is accepted between:	72A Reporting	TDR Reporting
Between January 1 and March 31	Report sales for January through March in 72A during April	Report April sales in TDR during May
Between April 1 and June 30	Report sales for April through June in 72A during July	Report July sales in TDR during August
Between July 1 and September 30	Report sales for July through September in 72A during October	Report October sales in TDR during November
Between October 1 and December 31	Report sales for October through December during January of the following year	Report sales for January of the following year during February of the following year

Q22. In the past I rounded my quarterly sales to the nearest whole dollar. Will I do any rounding of data in the TDR system?

- A. No, sales reported in TDR will be exact to the penny.

Q23. What data am I required to report?

- A. These data elements were selected because 1) they are typically already included on invoices submitted by the vendor; 2) represent the minimum amount of data the Government would need in order to conduct price analyses, and 3) are elements that cannot be obtained from other sources such as FPDS-NG. The clause requires contractors to submit the following data elements:
 - i. Contract Number
 - ii. Order Number or Procurement Instrument Identifier (PIID)
 - iii. Non Federal Entity, if applicable
 - iv. Description of Deliverable
 - v. Manufacturer Name
 - vi. Manufacturer Part Number
 - vii. Unit of Measure (each, hour, case, lot, etc.)
 - viii. Quantity of Item Sold
 - ix. Universal Product Code (UPC) if applicable
 - x. Price Paid per Unit
 - xi. Total Price Sold

Q24. In what format can I submit the data?



- A. Contractors have multiple options to submit their sales data such as:
 - 1. Form entry - where you fill out a form in your web browser
 - 2. File upload - where you upload an excel or .csv template populated with your sales data
 - 3. Electronic Data Interchange / EDI
 - 4. Web Services / API

Q25. What is the frequency of reporting?

- A. TDR data is reported monthly, and there is a 30-day window to report after the end of the month.

Q26. Is there difference in reporting for existing contractors versus new ones?

- A. TDR requires monthly reporting for all contractors involved.

Q27. If my data being reported is sensitive, how will GSA safeguard this data?

- A. GSA recognizes that there are orders that are sensitive, not classified. The 12 items required by the GSA Regulation change are invoiced items and not classified, therefore reporting requirements for sensitive orders are identical to reporting requirements for non-sensitive orders. To submit documentation that contains sensitive information, vendors must use the supporting documentation feature in the FAS Sales Reporting module. That data will be automatically encrypted and only the program office would be authorized to unlock. These terms will be identified in the contract.

Q28. What if my orders are firm fixed price and the items were not quoted individually?

- A. Please report the items in the way they were quoted.

IV. The Industrial Funding Fee (IFF)

Q29. When is IFF due?

- A. IFF must be paid quarterly. Contractors may, however, choose to remit IFF on a monthly basis when they report their sales if they prefer, and must do so through the TDR system.

Q30. Can I remit my IFF by mailing a check?

- A. No, all payments through TDR must be electronic using pay.gov. You can also submit your checking information with this method. No paper checks will be accepted.

V. The TDR Sales Reporting System

Q31. How do I log into the TDR System, and what is a digital certificate?



- A. Contractors will utilize a “digital certificate” to gain access to the TDR system. A digital certificate is an electronic credentials that:
- Asserts the identity of an individual
 - Enables eOffer/eMod to verify the identity of the individual entering the system and signing documents.
 - Encrypt or decrypt data to ensure that it is securely transmitted.
 - A packet of information that is stored on a web browser or on a token.
 - Create digital signatures which are verifiable.
- Q32. Where do I get a digital certificate and how much does it cost?**
- A. Two companies offer digital certificates: [IdenTrust](#) and [Operational Research Consultants \(ORC\)](#) the cost varies depending on the provider and your particular situation
- Q33. How long does it take to get a digital certificate and does it ever expire?**
- A. It will take between 7 and 14 days for a digital certificate to be issued after you have notarized you paperwork and submitted it to the company. Digital certificates must be updated every two (2) years. It is imperative that affected contractors keep their digital certificates current. An expired digital certificate will delay the ability to report sales and remit IFF.
- Q34. Can I use my DOD ECA certificate to log onto the system?**
- A. No.
- Q35. What if I made a mistake submitting sales data?**
- A. The TDR Sales Reporting site will act as the single system for contractor interface when it comes to sales reporting / sales adjustments. You can adjust data submitted through the TDR Sales Reporting site at any time.
- Q36. Will there be an opportunity to test our systems with GSA’s TDR Portal?**
- A. Yes, contractors will have the opportunity to explore a test environment to confirm their digital certificate is in order and select the best reporting format.
- Q37. How do I submit a Sales Adjustment? Will the TDR system accept a negative value for a credit memo?**
- A. Through the Adjust Sales feature, contractors may adjust already reported data after a mistake has been recognized. When adjusting sales via form entry, contractors can add/edit/remove line item details in their browser window. When adjusting sales using file upload contractors submit a replacement file for the data that was previously reported.



The system will not accept negative values. In the event of an instance where reported sales need to be removed from reported sales, the appropriate action is to make a sales adjustment for the month that the sale was originally reported - removing the sale from the report.

Q38. Where do I go for help with the TDR system?

- A. The VSC Helpdesk provides technical support for the TDR system: 877-495-4849 or vendor.support@gsa.gov.

VI. TDR Impact On Other Vehicles

Q39. How does this affect GWAC vendors?

- A. The TDR rule itself applies to all GSA contracts. However, the pilot only applies to the Schedules/SINs listed above in Question 3. Transactional data is already collected on the Alliant and Alliant Small Business GWACs but is not currently collected on the VETS and 8(a)STARS II GWACs. GSA will communicate accordingly with vendors participating on other GWACs, such as OASIS and HCATs regarding future implementation of TDR on these vehicles.

Q40. How does this affect OS3 contractors?

- A. OS3 contractors are not impacted by this pilot at this time.