Contracting Basics: Contractor Assessment Process and The role of the Industrial Operations Analyst

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Importance of Contract Compliance

➢ **GSA Strategic Goal**
Establish GSA as the premier provider of efficient and effective acquisition solutions across the Federal Government

➢ **FAS Initiative**
Provide trusted and compliant sources of supply to our customers
Objective - To Understand:

➢ Contractor Assessment Focus Areas

➢ IOA role in within FAS

The US federal government is the largest customer in the world... make them yours.
Acquisition Team Members

➢ PCO (CO) – Contracting Officer
➢ ACO (CS) – Contracting Specialist
➢ IOA – Industrial Operations Analyst
Who Conducts Contract Assessments?

**Industrial Operations Analyst (IOA)**

- Conducts contractor compliance assessments
- Monitors sales reporting, sales adjustments and Industrial Funding Fee (IFF) remittance
- Provides general guidance and business development support
- IOA contact information may be found at: https://vsc.gsa.gov/tools/aco_ioa.cfm
Contractor Assessments

➢ Objectives:

▪ To assess and evaluate contractor internal controls and overall compliance with GSA Schedule contract Terms & Conditions

▪ Completed “Virtually” or “Onsite”

▪ Address questions and/or concerns

▪ Performed for most GSA Schedule Contracts
Assessment Participants

➢ Contractor Personnel:
  • GSA Contract Administrator
  • Sales Reporting Representative
  • Other relevant personnel responsible for contractual functions (i.e. sales, marketing, accounting, order tracking, IFF remittance, etc.)

➢ GSA Personnel:
  • Industrial Operations Analyst (IOA)
Assessment Preparation

➢ Initial phone call or email from IOA

➢ Assessment confirmation email outlining requirements

➢ Familiarize yourself with requirements addressed in assessment confirmation email

➢ Provide data and/or documents timely to the IOA

➢ Don’t hesitate to contact the IOA with any questions
Recommended Documentation

➢ GSA MAS Contract and approved Modifications

➢ Current and previously approved pricelist(s) in effect for the review period

➢ Resumes of personnel performing “professional services”

➢ Sales data, IFF reporting and supporting transactional records

➢ Quotes, task order/purchase order documentation, invoices and supporting records for the review period
## Areas of Focus

### IOA – Contract Compliance – Contract Challenges

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Scope & Contract Compliance

➢ Contract items must be within the “scope” of the Schedule and approved Special Item Numbers (SINs)

➢ Only products or services awarded on the GSA Schedule pricelist may be sold

➢ “Open Market” (non-contract) items/services must be identified as such
Trade Agreements Act (TAA)

- Applies to “all” GSA MAS contracts
- TAA compliant countries may be found under FAR 25.003
- Service Contractors are TAA compliant if they are headquartered in compliant countries
Sales Tracking System

➢ Identifies, tracks and reports GSA sales accurately and completely

➢ Reports all transactions within the proper period

➢ Separates Schedule sales from other Federal and commercial sales
Sales Reporting & IFF Remittance

➢ IFF is inclusive to the Schedule pricelist

➢ The customers are assessed the IFF by using the GSA MAS contract program

➢ The GSA MAS program is funded by IFF
Sales Reporting Portal (SRP)

➢ The FAS SRP provides a safe, secure and user friendly portal for you, our Industry Partners, to report both transactional and aggregate level data required by your FAS contracts as well as multiple payment options for remitting the fee required pursuant to your contract.

Https://srp.fas.gsa.gov/#
Basis of Award (BoA)

➢ Discount relationship with predicates the GSA pricing

➢ Must be maintained to comply with the Price Reductions clause (GSAM 552.238-75)

➢ BoA is not applicable if Mod. A509, Transactional Data Reporting (TDR), was accepted
Pricing

➢ Must charge at or below the GSA Schedule price

➢ Price Increases – Economic Price Adjustments (EPA) must be approved by your CS/CO
  • Automatic escalations
  • One-time increases
Prompt Payment Discounts

➢ Awarded prompt payment discount terms must be displayed on all MAS invoices

➢ Does not apply to Government Purchase Card (GPC) payments

➢ Terms must be included in all MAS quotations
Labor Qualifications

➢ Assessment applies only to “Professional Services” awarded with qualified labor categories:
  • Advertising & Integrated Marketing Solutions
  • Environmental Services
  • Financial & Business Solutions
  • Mission Oriented Business Integrated Services
  • IT Professional Services
Order Level Materials (OLM)

- OLMs are supplies and/or services acquired in direct support of an individual task or delivery order placed against an FSS contract or BPA when the supplies and services are not known at the time of award of the Schedule contract.
- Prices are not established in the FSS contract or BPA.
- Prices are established and acquired at the order level and the ordering activity CO is responsible for making a fair and reasonable price determination.
- Purchased under the authority of the FSS program.
OLM Continued

Schedules that are impacted by OLM:

- 03FAC – Facilities Maintenance and Management
- 56 – Building, Building Materials/Industrial service, supply
- 70 – General purpose commercial IT, equipment, software
- 71 – Furniture
- 84 – Total Solution for Law Enforcement, Fire, Rescue
- 00CORP – The Professional Services Schedule
- 738X – Human Capital Management and Admin Support

More information can be found on GSA E-Library
www.gsaelibrary.gsa.gov
A brief review of Compliance Challenges

➢ Under-reported/over-reported sales
➢ Out-of-scope orders
➢ TAA non-compliant products and/or services
➢ Pricing overcharges
➢ Non-compliant labor qualifications
➢ Outdated or missing Advantage!® pricelist
➢ Missing pricelist from eLibrary!®
➢ Inaccurate contact information
➢ Missing records/documentation
➢ Prompt Payment Discount overcharges
➢ Volume/quantity discount overcharges
Common Administrative Challenges

- Out of date pricelist
- Pricelist not published
- Digital Certificates
- Authorized Negotiators
- Mass Modifications
- Missing contract/Mod documents
- Personnel turnover
What happens to assessment findings?

➢ IOA observations and findings of areas of non-compliance are integral to the closeout meeting
➢ Contractor should provide timeline for root cause analysis and proposed corrective action to the IOA
➢ IOA completes the “Assessment Report”
➢ Report provided to the contractor and the GSA CO/CS
➢ IOA will work with the contractor to monitor resolution of monetary areas of non-compliance (IFF, pricing overcharges, etc.)
➢ IOA will refer other areas of non-compliance to the GSA CO for review and follow-up

➢ Desired Outcome: A trusted and compliant MAS contract, and as necessary resolution of areas of non-compliance through identification of root causes and implementation of corrective actions to prevent future occurrence
Welcome to GSA eLibrary. GSA eLibrary is your one source for the latest GSA contract award information. GSA offers unparalleled acquisition solutions to meet today’s acquisition challenges. GSA’s key goal is to deliver excellent acquisition services that provide best value, in terms of cost, quality and service, for federal agencies and taxpayers.

GSA offers a wide range of acquisition services and solutions utilizing a variety of tools, contract vehicles, and services to meet the customer’s specific needs including Multiple Award Schedules, Governmentwide Acquisition Contracts, Technology Contracts, and Assisted Acquisition Services. For more information on what GSA has to offer, visit GSA.gov.

Search

- Contractor Directory
- Cross-Schedule Search

Category Guide
- Fall/Winter Supplies & Services
- Disaster Relief
- Hospitality, Cleaning, & Chemicals
- Laboratory, Scientific, & Medical
- Office Solutions
- Security Solutions
- Tools, Hardware, & Machinery
- Vehicles & Watercraft

News...

Important Security enhancement for GSA Advantage

Announcing the new Human Capital and Training Solutions (HCaTS) Program contracts. HCaTS provide reliable, flexible, fast and efficient ways to obtain best value customized solutions for human capital management and training requirements. Additional information can be found on the HCaTS webpage.

Get Quotes

GSA eBuy is an easy-to-use electronic Request for Quotation (RFQ) system designed to facilitate the request for submission of quotations.

With eBuy, getting quotes is just a click away!

go to eBuy >>

Additional Information

- Customers
  - Training Opportunities
  - FPDS-NG
  - EPLS
  - GSA Strategic Sourcing BPAs
  - Acquisition Gateway

- Contractors
  - FedBizOps
  - Schedules Sales Query
  - Vendor Support (VSC)

Schedule Contracts

GSA schedule contracts offer direct delivery of millions of state-of-the-art, high-quality commercial supplies and services at volume discount pricing:

- View schedule contracts
- GSA schedules info
- VA schedules info
- NAICS schedule/SIN crosswalk
- PSC schedule/SIN crosswalk

Technology Contracts

GSA technology contracts cover the whole spectrum of IT solutions, from network services and information assurance to telecommunications and purchase of hardware and software.

- View technology contracts
- GSA technology contracts info

State and Local Governments

Cooperative Purchasing

Purchase IT products, services, and support equipment from Federal Supply Schedules.

- View participating vendors
- Cooperative Purchase FAQ

Disaster Purchasing

Purchase products and services to facilitate recovery from a major disaster.

- View participating vendors
- Disaster Purchasing FAQ

www.gsaelibrary.gsa.gov
Click on the “Administration” tab

https://vsc.gsa.gov/
Getting on GSA Advantage!

- GSA Advantage!
- Getting on GSA Advantage!
- Options for Getting on GSA Advantage!
- Check your file status
- GSA Advantage! PO Portal
- What is a price list and why do I need one?
- GSA Advantage! Hints/Tips
- Part Numbers on GSA Advantage!
- SIP to FPT Transition Training

Exposure and Bidding

- GSA Advantage!
- Use of the GSA Logo
- GSA eLibrary
- Contract Price list
- GSA eBuy
- GSA Reverse Auctions
- Federal Business Opportunities (FBO)

Market Research

- Customer Profiles
- Best Value
- Marketing Matters GSA Interact Group
- Schedule Sales Query (SSQ)
- Who Can Purchase from my MAS Contract?
- Largest MAS Customers
- GSA eLibrary
- ASAP
- GSA Advantage! Archive Sales
- Federal Procurement Data System (FPDS)
- USASpending.gov
- Forecast of Contracting Opportunities
- Procurement Technical Assistance Centers (PTAC)
- Additional Internet Resources
Professional Services & Human Capital Category (PSHC)

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