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PRATT'S
**GOVERNMENT
CONTRACTING
LAW**
REPORT



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AND MORE!**

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GSA's Big Changes for 2020

*Merle M. DeLancey Jr.**

This article provides an update for current and prospective Federal Supply Schedule contractors about the big changes implemented or being implemented by the General Services Administration in 2020.

2020 may prove to be one of the most active years for federal contractors holding General Services Administration (“GSA”) Federal Supply Schedule (“FSS”) contracts and certain federal contractor registration requirements managed by GSA. This article explores GSA’s changes and addresses the consolidation of its federal supply schedules into one schedule, category management, a streamlined schedule, new Unique Entity Identifiers, and the Mass Modification implementing the terms and conditions for the Multiple Award Schedule.

FEDERAL SUPPLY SCHEDULES CONSOLIDATION

As promised, in October 2019, GSA released a solicitation that consolidated the solicitations for its 24 federal supply schedules into one solicitation to obtain an FSS contract. GSA’s consolidation involves three Phases.

- *Phase I* applies to companies that do not already hold an FSS contract. Phase I was the release of the consolidated solicitation for use by companies seeking to obtain a new schedule contract. On October 1, 2019, GSA released the consolidated solicitation.¹
- *Phase II* applies to companies that already hold one or more FSS contracts. Phase II will involve the mass modification of existing schedule contracts. The mass modification will be bilateral and will incorporate the new, uniform set of terms and conditions from the consolidated solicitation into all existing schedule contracts. The modification will result in all (new and existing) schedule contracts containing identical terms and conditions. GSA sent the modification to contractors in January 2020. Contractors will have until July 2020 to review and sign the modification.

Two notes with respect to Phase II. First, contractors that hold multiple

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¹ <https://beta.sam.gov/opp/d8dfc87dd4cb246f4c5fae066d0b0ef9/view>.

FSS contracts will receive a mass modification for each contract. Second, although a contractor will have until July 2020 to sign the mass modification, as an incentive to get contractors to not wait until the last moment to execute the modification, GSA has stated that a contractor cannot add Special Item Numbers (“SINs”) that were outside the scope of its existing FSS contract until it signs the mass modification.

- *Phase III* applies to contractors holding more than one FSS contract. Phase III will involve the consolidation of multiple schedule contracts held by one contractor into one, unified schedule contract. GSA expects Phase III to begin in July 2020. GSA intends to work individually with each company to determine the best option for consolidating its multiple FSS contracts.

A tailored approach could involve allowing one or more of a contractor’s FSS contracts to lapse and focusing on the contractor’s most active FSS contract. Alternatively, the best option for some contractors may involve letting all of its FSS contracts expire and pursuing a new FSS contract under the new consolidated solicitation. If applicable, the best option for a contractor also will involve consideration of any blanket purchase agreement (“BPAs”) held by the contractor. There is no end date for this Phase.

With the move to one federal supply schedule, GSA seeks to ease FSS contracting burdens for contractors and contracting officers. For example, common lease and delivery terms, small business plan requirements, and an economic price adjustment clause should ease contract administration issues and allow for expedited FSS ordering. However, there will be implementation issues consolidating 24 schedules covering diverse products and services into one schedule.

There are fundamental differences between the purchase of products and services and even within the purchase of different services depending upon the solution being proposed by a contractor or sought by an agency. For example, certain terms and conditions applicable to IT products and services solutions are unlikely to be comparable to safety and security solutions or office furniture solutions.

While some terms and conditions can be the same for each of these, commercial sales, upon which FSS pricing is based, does not buy each of these solutions the same way. As such, even after schedule consolidation, some flexibility will be required in order for FSS contracts to remain a viable way for companies to sell to the federal government.

Ultimately, success or failure of GSA’s consolidation may depend on the flexibility afforded by your contracting officer and whether he/she feels constrained from deviating from the new, common terms and conditions.

In the near term, FSS contractors and companies that are contemplating seeking an FSS contract should consider the following:

- Companies may want to hold off submitting any new offers for an FSS contract until the dust settles at GSA.
- After receipt, contractors should carefully review GSA's Mass Modification to assess any potential impact it may have on previously-negotiated specialized terms and conditions—most notably when price reductions are triggered.
- Contractors should confirm their internal management systems are prepared to handle schedule consolidations. While some contractors have a centralized contract management structure, most have their applicable business unit manage its own FSS contract. A decentralized approach most likely means that one business unit has little to no contact with other business units that hold schedule contracts.
- Contractors should coordinate communications with GSA and its current structure. For example, service contracts are handled in Auburn, Washington, while IT contracts are handled in Washington, D.C.; Atlanta; Kansas City; and Fort Worth.
- Contractors should be proactive in terms of communicating with their contracting officers. There may be ways to influence which contracting officer is responsible for its consolidated FSS.

CATEGORY MANAGEMENT AND THE NEW CONSOLIDATED SCHEDULE

There have been certain fundamental, structural changes to the consolidated schedule made during Phase I.

Generally speaking, GSA's restructuring can be labeled Category Management. Over the last year, the GSA Category Management Leadership Council and the Office of Management and Budget developed a government-wide category structure to support category management implementation across the federal government.

For years, there has been an increase in Special Item Numbers under the 24 schedules. Schedules and SINs often overlapped. GSA preferred the overlap as opposed to having gaps in product and services offerings. The overlap, however, led to agency and Federal Supply Schedule contract-holder confusion. And, as a result, contractors made sure to have their products and services listed under all potentially applicable schedules and SINs. This caused increased administrative work for all involved and less efficient agency purchasing as contracting officers sought to make sure contracting opportunities captured all potential vendors.

Among other benefits, GSA's schedules consolidation seeks to resolve this administrative quagmire. Included within Phase I of GSA consolidation efforts:

- (1) Mapping duplicate SINs from the 24 schedule solicitations, and
- (2) Using North American Industry Classification System ("NAICS") codes to dramatically reduce the number of SINs in the consolidated, single solicitation.

GSA used Category Management to reorganize offerings across the single solicitation. Prior to consolidation, GSA had 24 federal supply schedules consisting of over 900 SINs. After consolidation, there is now one federal supply schedule with 12 large categories, 83 subcategories, and approximately 300 SINs.

The 12 large categories are:

- (A) Office Management;
- (B) Facilities;
- (C) Furniture & Furnishings;
- (D) Human Capital;
- (E) Industrial Products and Services;
- (F) Information Technology;
- (G) Miscellaneous;
- (H) Professional Services;
- (I) Scientific Management and Solutions;
- (J) Security and Protection;
- (K) Transportation and Logistics Services; and
- (L) Travel.

With respect to subcategories, a representative example is the Information Technology category which is broken down into seven subcategories:

- F01. Electronic Commerce;
- F02. IT Hardware;
- F03. IT Services;
- F04 IT Software;
- F05 IT Solutions;
- F06. IT Training; and
- F07. Telecommunications.

Each SIN has a number, a “plain language title,” and is mapped to one or more NAICS codes.

The NAICS system is the standard used by federal statistical agencies in classifying business establishments for the purpose of collecting, analyzing, and publishing statistical data related to the U.S. business economy. NAICS codes describe the principal nature of the products or services being offered and are used to determine business size at the schedule contract level. NAICS level business size standards are set by the Small Business Administration.

USING THE NAICS SYSTEM WILL MAKE PURCHASING EASIER

GSA believes using the NAICS system will make schedule contracts easier to use. The new structure will simplify the process of locating products and services because the same products and services will fall under one category. Companies offering multiple categories will no longer need to hold multiple schedule contracts. Schedule holders can properly position themselves under the appropriate categories and areas of expertise. This, in turn, will allow GSA to more easily organize offerings of similar products and services, so buyers can maximize competition.

POSITIVE EARLY REVIEWS ON RESTRUCTURING

In early polling (August 2019), industry partners indicated approval of GSA’s category and subcategory construction, as well as SIN mapping:

- 84 percent of current contractors agreed that the mapping from current schedules and SINs to the new large categories, subcategories, and SINs was clear;
- 78 percent agreed with the mapping of their current SINs;
- 91 percent of prospective offerors agreed that the large categories are clear; and
- 83 percent of prospective contractors agreed that the subcategories and SINs are clear.

A COMPLEMENT TO GSA

All involved hope these favorable views continue as GSA’s consolidation efforts mature. Regardless, GSA must be given credit for its incredible outreach efforts to all FSS stakeholders. While rumors of and cries for schedule consolidation have abounded for years, maybe even decades, once GSA undertook this effort its actions have been transparent and inclusive.

WITH GSA’S SCHEDULE CONSOLIDATION, WHAT IS CHANGING AND WHAT IS NOT

This section answers common industry questions regarding what is and is not changing as a result of schedule consolidation.

- Transactional Data Reporting (“TDR”): Schedule consolidation will not affect the TDR pilot. For contractors participating in the TDR pilot, TDR will continue to apply. If you hold a TDR Special Item Number it will continue to apply to your entire schedule contract.
- Cooperative Purchasing: Cooperative Purchasing will continue to apply, but only to the applicable SIN in your schedule contract. Unlike TDR, it will not extend to your entire contract.
- Order Level Materials (“OLM”): The OLM SIN has not been added to every schedule. Under consolidation, OLM SINs will be expanded to all schedule contractors.
- GSA Systems: Under the consolidated schedule, GSA intends to update and refresh eLibrary, eBuy, eOffer/eMod, and GSA Advantage so that they align with the consolidated schedule. GSA estimates the updates will occur in July 2020.
- Department of Veterans Affairs (“VA”) Schedules: No changes. VA schedules will not be consolidated at this time.
- GSAR and FAR clauses: General Services Administration Acquisition Regulation (“GSAR”) and Federal Acquisition Regulation (“FAR”) clauses are not being revised. Any such changes in the future will go through the formal rulemaking process.
- Contract Number: If you hold one schedule contract, your contract number will not change. If you hold multiple contracts, GSA has announced that it will work with you to determine the best solution for your company.
- Option Periods: For contractors with one schedule (or one new follow-on contract and a soon-to-be-expired contract), option periods will not be affected. For contractors with multiple contracts, GSA will provide different options depending on the status of the contracts.
- Blanket Purchase Agreements: BPAs established and awarded prior to the completion of consolidation will continue in effect until the BPA or the schedule contract expires, whichever occurs first.
- Special Item Number Restructuring:
 - Small business set aside SINs are not being changed.
 - With consolidation, GSA streamlined, renamed, and reduced SINs. The new list of SINs has been mapped to NAICS codes. Contractors should review their System for Award Management (“SAM”) registration to ensure the applicable NAICS are listed

in their SAM profile.

- To encourage contractors to accept the upcoming schedule mass modification, GSA intends to update eBuy in July to only display opportunities for new SINs. Until July, GSA is mapping legacy and new SINs, so contractors will see all opportunities posted under either SIN.
- Data Universal Numbering System (“DUNS”): If you have multiple schedules, all schedules under the same DUNS will be consolidated. Schedules with different DUNS will not be consolidated and will continue to have their own individual requirements.
- Evaluation Factors: For vendors seeking a new schedule contract under the consolidated solicitation, many technical evaluation factors have changed and vendors have more options as a substitute for an Open Ratings Report. Under an Open Ratings Past Performance Evaluation, Open Ratings, a Dun & Bradstreet (“D&B”) Company, conducts an independent audit of customer references and calculates a rating based upon a statistical analysis of various performance data and survey responses.

DUNS to UEI

In addition to Federal Supply Schedule consolidation, GSA is replacing the official identifier used by federal government contractors. Specifically, GSA is transitioning from and will stop using the Dun & Bradstreet (“D&B”) proprietary system for verification and validation of entities registering to do business with the federal government. Effective December 2020, GSA intends to have transitioned all government systems away from using D&B Data Universal Numbering System numbers and instead using new Unique Entity Identifiers (“UEI”). The UEI is a new, nonproprietary identifier that will be assigned through GSA’s System for Award Management registration process.

Since as early as the 1960s, the federal government has contracted with D&B to provide DUNS numbers to companies seeking to contract with the federal government. Just like a CAGE (Commercial and Government Entity) code, an entity seeking to contract with the government must first contact D&B and obtain a DUNS number. A DUNS number is a unique nine-digit identifier for each entity performing or seeking to perform federal government contracts. Only after obtaining a DUNS number can a company then register in SAM. If a company needs to change its legal business name or physical address, it is must make such changes through D&B. Only after D&B updated a contractor’s DUNS record and made the data available to SAM could a contractor update its SAM registration.

This government's reliance on a system owned by a private entity is unique. It also is surprising given that the D&B proprietary DUNS system served as the sole entry way for companies to be able to do business with the federal government. Regardless, for many years, D&B received sole source contracts from GSA. In December 2014, the government began moving away from the DUNS system by removing references to DUNS numbers from federal regulations. In October 2016, the Federal Acquisition Regulation was amended to replace references to DUNS numbers with UEIs. After seeking stakeholder input and conducting a procurement, in March 2019, GSA awarded a contract to Ernst & Young ("E&Y") to process and assign UEIs to entities in lieu of DUNS numbers.

Starting in December 2020, GSA hopes to have completed implementation of a streamlined request and management process for UEIs. An entity will be able to go to SAM to:

- Request a UEI and register to do business with the government;
- Update or change its legal business name or physical address associated with the UEI; and
- Contact customer support for all UEI and entity registration issues.

Existing SAM registrants will be automatically assigned a UEI and will not be required to re-enter any of their existing data in SAM.gov (currently beta.Sam.gov). A contractor's existing information in SAM—registration, core data, assertions, representations and certifications, points of contacts, etc.—will not change. Existing DUNS numbers will be retained for search and reference purposes. GSA intends to implement a notification process so entities registered in SAM can find their new assigned UEIs. UEIs will be assigned to active and inactive entity registrations in SAM.

New SAM registrants will be assigned a UEI as part of their initial registration. When requesting a UEI, an entity will provide basic data (for example, legal entity name, doing business as name, physical address) which E&Y will use to validate the entity's uniqueness.

As with DUNS numbers, there will be a UEI hierarchy so that the UEIs for a parent corporation and its subsidiaries will continue to be related. The UEI format, however, will not be the same as the DUNS number format. UEIs will be twelve characters using both alpha and numeric characters. DUNS numbers are nine numeric characters.

This new format means all existing government systems that rely on DUNS numbers will require reprogramming to recognize the UEI structure. Such reprogramming presents the highest risk to UEI implementation. Agency

systems will be transitioned throughout 2020 with an estimated completion in December 2020. Transition almost assuredly will involve some disruption as some agencies will need to access DUNS numbers, while other agencies have already transitioned to UEs. There is nothing contractors can do to avoid potential disruption, but at least now they understand the cause and can avoid or lessen resulting panic attacks.

**THE MASS MOD IS COMING, THE MASS MOD IS COMING . . .
WAIT, IT'S HERE!**

Here is what you need to know about the GSA's recent release of the Mass Modification ("Mass Mod") implementing the terms and conditions for the Multiple Award Schedule ("MAS"):

- If you have not received an e-mail with the Mass Mod, do not panic. The Mass Mod is being released on a legacy schedule basis. Likewise, contractors with pending modifications to add or delete Special Item Numbers will not receive the Mass Mod until those modifications are completed.
- Contractors must accept the Mass Mod by July 31, 2020. It is mandatory. Failure to do so will result in your offerings no longer being accessible on GSA Advantage or the GSA eLibrary.
- Contractors do not accept the Mass Mod in its entirety. Rather, contractors are asked to accept or request an exception to each clause in the Mass Mod. For each requested exception, a contractor must provide a justification. Ultimately, contractors will be required to negotiate all exceptions with their contracting officer.
- If a contractor has not resolved all of its exceptions with its contracting officer by July 31, the contractor will not have accepted the Mass Mod (see above). GSA recommends that contractors reach out to their contracting officers before April 1 to ensure there is adequate time to negotiate exceptions before the July 31 deadline.
- Contractors are not required to take exception to clauses that do not apply. As an example, GSA has routinely referred to Transactional Data Reporting. If you are not participating in the TDR pilot, you do not need to take exception to the TDR clauses.
- Your assigned contracting officer, contract number, period of performance, prices, and products and services offered will not change as a result of acceptance of the Mass Mod. You are not required to re-represent your business size when accepting the Mass Mod. Participation in voluntary programs will carry over and not change. For

example, if you participate in TDR, that participation will remain. If you are eligible and participate in Cooperative and Disaster Purchasing, it will automatically transfer to the new SIN structure.

- A contractor's existing SINs will be mapped and automatically migrated to the MAS's new SIN structure and will show up on GSA eLibrary the day after a contractor accepts the Mass Mod.
 - Nine legacy SINs have been split into multiple new SINs. A contractor should be awarded all of the new SINs mapped to its legacy SINs. If a contractor believes its products and/or services have not been mapped to the correct new SIN, it can submit a SIN modification request after accepting the Mass Mod.
 - Acceptance of the Mass Mod will not automatically affect pricing or products loaded in GSA Advantage. After signing the Mass Mod, contractors will need to merge its SINs into GSA's System Input Program ("SIP"). Within 30 days after accepting the Mass Mod, contractors will need to submit a revised catalog with its new MAS number and its products and/or services organized under its new SIN number(s). In addition, your price list should be revised to only include your new SINs.
 - If you have multiple legacy schedule contracts, you will receive multiple Mass Mods. You need to accept a Mass Mod for each of your current schedule contracts.

July 31 will be here before you know it. Contractors should not delay working on acceptance of the Mass Mod. It cannot be stressed enough that contractors should reach out to their contracting officers early and often with any questions and to negotiate any exceptions. Remember, contracting officers are responsible for multiple contractors. You need to take steps now to avoid what assuredly will be a melee during the last week of July.