

## From the Editor

Summer days will soon pass and the start of a new fiscal year at GSA will begin. In this 37th issue of *GSA Steps* we hope you find great tips and new information to aid in making your company and its business with the government stronger. This issue includes articles on AbilityOne and vendor awareness, tips on becoming more sustainable vendors, changes in Eligibility for Purchasing on MAS Schedules and subcontract reporting for Small Business. In addition, this issue also gives you an opportunity to provide your feedback on draft guidelines with regard to “Green” Product Standards and Ecolabels in federal procurement as well as news on cybersecurity.

If you would like to provide feedback and/or have suggestions for subjects to cover in future newsletters, please feel free to contact [contract.relations@gsa.gov](mailto:contract.relations@gsa.gov). ■



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## Subcontract Reporting for Large Businesses

As we enter the fourth quarter of fiscal year 2013, which ends on September 30th, this is a reminder to large companies with federal government contracts that you will have up to 30 days to submit your end of year reports (due October 30, 2013). In preparation for the upcoming FY 2013 reporting period, please review the Electronic Subcontract Reporting System (eSRS) to ensure that you are up to date on reporting requirements for all prior fiscal years, as well.

In accordance with FAR clause 52.219-9, having a contract covered by an **individual** subcontracting plan requires semi-annual cumulative reporting throughout the contract term via Individual Subcontracting Report (ISR) into [www.eSRS.gov](http://www.eSRS.gov). You are also required to submit the Summary Subcontract Report (SSR) covering achievements on all your government contracts for the current fiscal year.

For those companies with approved **commercial** subcontracting plans, you are only responsible for the annual SSR for the current fiscal year also due by October 30, 2013. More details were provided in the Summer 2013 issue number 36 and all requirements and instructions to contractors may be found in the above reference FAR clause at 52.219-9. ■



## GSA Order 4800.2H Creates Changes in Eligibility for Purchasing on MAS Schedules

GSA Order 4800.2H reflects statutory and administrative changes and partially updates the listings of organizations determined eligible to use GSA sources of supply and services. Two significant changes in eligibility for using Multiple Award Schedules are a result of the recent update in 4800.2H, expansion of the State and Local Disaster Recovery Purchasing Program and a new authorization for National Voluntary Organizations Active in a Disaster (NVOAD) to purchase via Schedules.

### Immediate Expansion of the State and Local Disaster Recovery Purchasing Program:

Section 4 of the Federal Supply Schedules Usage Act of 2010 (Public Law 111-263), states that the Recovery Purchasing program, initially created under the John Warner Defense Authorization Act of 2007, be expanded to include the words “facilitate disaster preparedness or response.”

GSA, pursuant to this Act, has authorized the expansion of the State and Local Disaster Recovery Purchasing program, from this point on referenced as the Disaster Purchasing Program, to include state and local access to Federal Supply Schedules for the purposes of disaster preparation and response, in addition to facilitation of recovery from major disasters. GSA Order 4800.2H, Eligibility to Use GSA Sources of Supply, has been updated to reflect this new expansion of scope. This authorization allows for immediate access to all Schedules, when state and local governments are purchasing to facilitate recovery from major disasters or for disaster preparation or response.

Orders placed by state and local entities, under the Disaster Purchasing program must include the following statement:

*This order is placed under GSA Schedule number \_\_\_\_\_ under the authority of the GSA Disaster Purchasing program. The products and services purchased will be used in preparation or response to disasters or recovery from major disaster declared by the President, or recovery from terrorism or nuclear, biological, chemical, or radiological attack.*

For the purposes of this authority, the following are the definitions of preparedness, response, and recovery, per the National Response Framework.

**“Preparedness”** means actions that involve a combination of planning, resources, training, exercising, and organizing to build, sustain, and improve operational capabilities. Preparedness is the process of identifying the personnel, training, and equipment needed for a wide range of potential incidents, and developing jurisdiction – specific plans for delivering capabilities when needed for an incident.

**“Response”** means immediate actions to save lives, protect property and the environment, and meet basic human needs. Response also includes the execution of emergency plans and actions to support short-term recovery.

**“Recovery”** means the development, coordination, and execution of service- and site-restoration plans; the reconstitution of government operations and services; individual, private-sector, nongovernmental, and public-assistance programs to provide housing and to promote restoration; long-term care and treatment of affected persons; additional measures for social, political, environmental, and economic restoration; evaluation of the incident to identify lessons learned; post incident reporting; and development of initiatives to mitigate the effects of future incidents.

If you are currently a GSA Schedule contractor and have agreed to participate in the Disaster Recovery

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## GSA Order 4800.2H Creates Changes in Eligibility for Purchasing on MAS Schedules *continued*

Purchasing Program, there is no modification required at this time to your Schedule contract, in order to accept orders from the state and local governments, under this authority. If you are currently a GSA Schedule holder and have not agreed to participate in the Disaster Recovery Purchasing Program, you will need to contact your Contracting Officer in order to modify your contract and accept orders under this authority. New offerors must agree to participate in the program at the time of award of their GSA Schedule contract. Acceptance of orders from state and local governments is voluntary. Schedule contractors may decline an order, for any reason, within a five-day period after receipt of the order; however, credit card orders must be declined within 24 hours (GSAM 552.232-79). Orders placed under this authority are subject to the Industrial Funding Fee and should be reported quarterly on your 72a form under the RC SINs.

### **New Authorization for National Voluntary Organizations Active in a Disaster (NVOAD) to Purchase via Schedules:**

GSA Schedule contractors can now sell to the National Voluntary Organizations Active in a Disaster (NVOAD) through their Federal Supply Schedules contract. Section 2 of the Federal Supply Schedules Usage Act of 2010 (Public Law 111-263), states that the Administrator of General Services may provide for the use of Federal Supply Schedules, by other qualified organizations to facilitate emergency preparedness and disaster relief. Under the Act, the term “qualified organization” means a relief or disaster assistance organization as described in section 309 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5152).

GSA, pursuant to this Act, has authorized the NVOAD members to access Schedules when purchasing in furtherance of emergency preparedness and disaster relief. GSA Order 4800.2H, Eligibility to Use GSA Sources of Supply, has been updated to reflect this new

eligible ordering activity. This authorization allows for immediate access to all Schedules, when the NVOAD members are purchasing in furtherance of purposes of emergency preparedness and disaster relief.

Purchases under this authority by other qualified organizations shall be used only in furtherance of purposes determined to be appropriate to facilitate emergency preparedness and disaster relief and set forth in guidance by the Administrator of General Services, in consultation with the Administrator of the Federal Emergency Management Agency. The authority under this subsection may not be used to purchase supplies for resale.

At this time, there is no modification needed to your Schedule contract in order to accept orders from NVOAD members, as acceptance of orders from NVOAD is voluntary. Schedule contractors may decline an order, for any reason, within a five-day period after receipt of the order; however, credit card orders must be declined within 24 hours (GSAM 552.232-79). Orders placed under this authority are subject to the Industrial Funding Fee and should be reported quarterly in your 72a sales and are included in your federal sales.

For more information on the Disaster Recovery Program, visit [www.gsa.gov/disasterpurchasing](http://www.gsa.gov/disasterpurchasing). To view a list of NVOAD members, please visit [www.nvoad.org](http://www.nvoad.org). If you have questions on either change, please contact Tricia Scaglione ([tricia.scaglione@gsa.gov](mailto:tricia.scaglione@gsa.gov)). ■



## GREEN CORNER

### The “Three Tiers” Approach to Sustainability

Sustainability requirements are the norm in large corporate supply chains, and are growing more important for federal government contracting every year. Although sustainability plans, greenhouse gas (GHG) emissions inventories, and other practices discussed in this article are not MAS contract requirements, GSA task orders increasingly ask about sustainability, and sometimes consider it as part of a company’s approach to delivering best-value solutions.

Sustainability practices can help companies operate efficiently and reduce costs, as well as increase customer satisfaction, employee loyalty, and overall competitiveness — especially if they are well chosen and appropriate to the company. For these reasons, whatever your experience with sustainability, GSA invites contractors to consider three “tiers” of sustainability practices, which can build on each other as the company’s approach to being more sustainable evolves.

#### **Tier 1 Act and Save**

Tier 1 actions are basic, specific ways to save money by reducing waste. Even without a formal sustainability plan, most companies can act to reduce waste and save money almost immediately. By reducing harm to the environment as a matter of policy, Tier 1 actions can also make a company more attractive to customers and employees.

- Does the company buy Energy Star equipment and enable power-saving settings?
- Is HVAC equipment regularly serviced to ensure it’s working efficiently?
- Has the company installed energy-efficient lighting and controls like motion sensors or timers?
- Do packaging and shipping practices ensure the right balance between costs, content protection, and waste?
- Has the company requested a free energy audit from a local utility?

- Does the company recycle?
- Is printing and copying minimized by using electronic communications?
- Are printers and copiers set to print and copy double-sided?

#### **Tier 2 Prioritize, Track and Refine**

Tier 2 practices help companies prioritize, track and refine their Tier 1 actions. While Tier 1 actions by themselves can reduce waste and save money, Tier 2 practices take companies to the next level by ensuring that sustainability investments are as productive as possible.

- Has the company identified its most important sustainability-related cost and revenue drivers (such as electricity, fuel, hazardous materials, water use, or green business opportunities), and made a plan to address them?
- Does the overall sustainability plan have the support of senior management?
- Is there a company-wide process to track energy, water, and other sustainability-related costs over time, to seek continuing gains in efficiency?

#### **Tier 3 Communicate and Collaborate**

Tier 3 practices leverage sustainability in a company’s external relationships with customers, suppliers, investors, associations, and advocacy groups.

Organizations like the Carbon Disclosure Project (<http://cdproject.net>) and Global Reporting Initiative (<http://globalreporting.org>) help companies organize and disclose sustainability information to stakeholders. Sustainability disclosures, GHG inventories, sustainable purchasing policies, and civic partnerships can help build brand identity, answer customer and investor inquiries, and incentivize maximum performance throughout the company.



## GREEN CORNER *continued*

### Provide Your Feedback on Draft Guidelines on the Use of “Green” Product Standards and Ecolabels in Federal Procurement

Big news for MAS vendors selling “green” products! The Environmental Protection Agency (EPA) is proposing Guidelines that are intended to be used as the basis for selecting non-governmental product environmental performance standards and ecolabels for voluntary use in federal procurement. The Guidelines and other relevant information will be posted on the Federal Register soon. A link will be posted on the Vendor Support Center once it’s available.

The Guidelines WILL NOT change or revise existing requirements for federal purchasers to purchase products meeting standards, ecolabels, attributes, and programs currently required by Executive Order, statute, or regulation. So ENERGY STAR®, EPEAT, BioPreferred and other programs will still be required for federal buyers. For a full list of these green purchasing requirements, visit the Green Procurement Compilation at [sftool.gov/greenprocurement](http://sftool.gov/greenprocurement).

The Guidelines ARE intended to address other product environmental standards and ecolabels. Let’s use furniture as an example. Federal buyers must procure furniture with a minimum level of recovered content<sup>1</sup>. However, there are many other “green” standards and ecolabels that address furniture – many of which address the full product life cycle and address multiple environmental impacts (including recovered content). The Guidelines would be used to select these standards and ecolabels for voluntary use in federal procurement.

As a MAS contract holder, a significant impact is that the standards and ecolabels that are determined to meet the Guidelines will eventually be included on *GSA Advantage!*<sup>®</sup>, the Green Procurement Compilation and other platforms.

The Guidelines offer a fair, systematic and transparent way for GSA to increase its green offerings and help agencies to make a more sustainable government. Let EPA know what you think!

#### The Guidelines are organized into the following four sections:

**Section I** “Guidelines for the Process for Developing Standards” addresses the procedures used to develop, maintain, and update an environmental standard.

**Section II** “Guidelines for the Environmental Effectiveness of the Standards” addresses the criteria in the standard or ecolabel that support the claim of environmental preferability.

**Section III** “Guidelines for Conformity Assessment” addresses the procedures and practices by which products are assessed for conformity to the criteria specified by standards and ecolabeling programs.

**Section IV** “Guidelines for Management of Ecolabeling Programs” addresses the organizational and management practices of an ecolabeling program.



<sup>1</sup> EPA’s Comprehensive Procurement Guidelines establish the recovered content thresholds for various product categories. See [sftool.gov/greenprocurement](http://sftool.gov/greenprocurement) for more information.



## Cybersecurity: A Business Imperative for Federal Acquisition

When the government (or any organization) purchases products or services with inadequate in-built cybersecurity, the risks persist throughout the lifespan of the item purchased. The lasting effect of inadequate cybersecurity in acquired items is part of what makes acquisition reform so important to achieving cybersecurity and resiliency. Increasingly, the federal government relies on network connectivity, processing power, data storage, and other information and communications technology (ICT) functions to accomplish its missions. According to a report by the non-profit Center for Strategic and International

Studies, the impact of malicious cyber activity in the U.S. is \$100 billion a year in economic loss.

So, why does this matter to you, our industry partners? First you have “skin in the game,” your organization’s most precious assets are subject to cyber risks, and second our shared federal customers are already beginning to demand higher levels of cybersecurity in delivered solutions —

and this trend is on the increase.

On February 12th, 2013, the President issued Executive Order 13636, entitled “Improving Critical Infrastructure Cybersecurity” (EO 13636)

and Presidential Policy Directive 21, “Critical Infrastructure Security and Resilience” (PPD). By issuing the EO and PPD together, the Administration is taking an integrated approach that strengthens the security and resilience of critical infrastructure against all hazards. Through an updated and overarching national framework that acknowledges the increased role of cybersecurity in securing physical assets and calls for enhanced information sharing and public-private partnerships.

In accordance with EO 13636, GSA and the Department of Defense recently submitted recommendations to the President addressing the feasibility, benefits, and merits of incorporating cybersecurity standards into acquisition planning and contract administration, and harmonizing procurement requirements. The recommendations focus on the need for baseline cybersecurity, workforce training, and consistent cybersecurity terminology. These are suggested to be combined with incorporation of cyber risk management into federal enterprise risk management, development of more specific and standardized security controls for particular types of acquisitions, limiting purchases to certain sources for higher risk acquisitions, and increasing government accountability for cybersecurity throughout the development, acquisition, sustainment, use, and disposal lifecycles.

Achieving cyber resilience will require investments in the personnel and resources necessary to appropriately manage cyber risks. Building federal cyber resiliency requires interagency coordination and cooperation between the public and private sectors (including between supply chain suppliers and providers). Most importantly, it also requires everyone from front-line employees to those in the most senior leadership positions to have greater awareness of the issue.

<sup>2</sup> Lewis, James Andrew and Baker, Stewart, *The Economic Impact of Cybercrime and Cyber Espionage* (Jul 2013), available at <http://csis.org/publications>.

<sup>3</sup> Available at <http://www.whitehouse.gov/briefing-room/presidential-actions/executive-orders>. Among other things, PPD-21 explicitly links cyber and physical security and superseded Homeland Security Presidential Directive 7, issued in 2003, and designates GSA as a “Sector Specific Agency” for federal facilities.

## AbilityOne and GSA Collaboration on Vendor Awareness

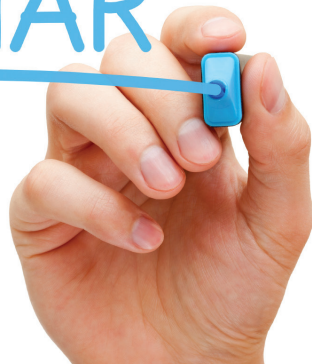
GSA working in collaboration with the AbilityOne Program will launch a series of free online education courses to enhance awareness and knowledge of the program for vendors and Multiple Award Schedule holders. Three virtual training tracks will focus on the following areas:

- Mission of the AbilityOne Program and Becoming an Authorized Dealer
- Overall Compliance Program Launched by GSA and the AbilityOne Program
- Effective Marketing Tools Specific to Recently Launched AbilityOne Products

This education series will be launched in three parts with the first session to be released in December 2013. Please look for the link to the first session (Mission of the AbilityOne Program and Becoming an Authorized Dealer) to be released in the December 2013 *GSA Steps* newsletter.

October 9-11 is the 2013 NIB/NAEPB National Conference and Expo in National Harbor, Maryland, hosted by National Industries for the Blind and the National Association for the Employment of People Who Are Blind. This event is a perfect opportunity for business partners, suppliers, vendors, customers and NIB associated nonprofit agencies to come together to hear from government and industry leaders, network, create business development opportunities and attend practical skill-development sessions. For more information click here <http://www.nib.org/about-us/events>.

# WEBiNAR



### Upcoming Webinar Education

**FREE GSA Schedules Webinars open to all vendors!**

Register at [www.gsa.gov/masnews](http://www.gsa.gov/masnews)

**Basic Contracting for GSA Schedules 09/05/2013**

Part 1: 10:30am – 12:00pm ET

Part 2: 1:00pm – 2:30pm ET

This comprehensive course provides an overview of GSA Schedules contracting and ordering procedures. Learn about placing orders against Multiple Award Schedules, as outlined in FAR Subpart 8.4. You will also learn about the unique flexibility within the GSA Schedules program.

**Note:** The MAS Basic course is offered in a Part 1/Part 2 format with an hour break from 12:00pm – 1:00pm EST.

**GSA Schedules and Small Business 10/03/2013**

1:00pm – 2:00pm ET

Learn how to achieve your socioeconomic goals with the GSA Schedules program. And learn how the FAR was changed to provide agencies with discretionary authority to set-aside orders against multiple award contracts for small business.

**FAR 8.4 vs Open Market 11/07/2013**

1:00pm – 2:00pm ET

This session explores the differences and similarities between Subpart 8.4 and Parts 13 & 15 procedures, advantages and disadvantages for various situations, and will help you analyze the alternatives as you develop your acquisition strategy.

**GSA Schedule Contractor Team Arrangements (CTAs) – 12/05/2013**

1:00pm – 2:00pm ET

This course explores Contractor Team Arrangements (CTAs) and how they benefit the customer and the contractor by saving time and effort. CTAs allow increased flexibility for meeting agency needs through the simplified procedures of the GSA Schedules program.