

## Supply Chain Risk & Resolution: Unauthorized Suppliers

### **Background**

FAS regularly contacts Schedule contractors regarding products they are not authorized to sell that are listed on their contract and displayed on GSA Advantage!®. FAS identifies unauthorized suppliers using the [Verified Products Portal](#) (VPP). The VPP is GSA's official source for supplier authorization information and allows GSA to obtain supplier authorization data directly from participating manufacturers and their authorized partners.

### **What is an Unauthorized Supplier?**

An “unauthorized supplier” is a Schedule contractor that has products listed on their Schedule contract that they are not authorized to sell based on information from the VPP. Offering unauthorized products on MAS contracts is a violation of clause [I-FSS-644 Products Offered and Sold by Vendors Other Than the Manufacturer](#).

If a product is flagged as “unauthorized” it means that either:

- The manufacturer is a VPP participant who maintains a supplier authorization program. The vendor is NOT listed by the manufacturer as an authorized supplier and is therefore NOT authorized to sell the product; or
- The manufacturer is a VPP participant who has an open distribution policy, meaning that all vendors are authorized to sell the product unless expressly identified as prohibited by the manufacturer. The manufacturer has expressly identified this vendor as prohibited, and the vendor is therefore NOT authorized to sell this product.

### **Process**

The Unauthorized Supplier Robomod process is summarized as follows:

- **Identify unauthorized products:** The Catalog Management Office (CMO) uses the VPP to identify products that are not explicitly authorized. The CMO coordinates with manufacturers to validate products not explicitly authorized.
- **Notify impacted MAS COs:** Policy and Compliance (OPC) notifies impacted Contracting Officers (COs), Contract Specialists (CSs), Administrative Contracting Officers (ACOs) and Industrial Operational Analysts (IOAs).
- **Opt out Notification:** OPC emails impacted COs “opt out” [Google Form](#).
- **Robomod issued:** SF-30s are issued and unauthorized products are removed at a later date from the MAS contract and GSA Advantage! for contracts where the CO did not “opt out”. GSAR clause 552.238-79 *Cancellation* and clause [I-FSS-644 Products Offered and Sold by Vendors Other Than the Manufacturer](#) are cited as the authority.
- **CMO reviews evidence:** CMO reviews evidence from contractors claiming to be authorized to offer and sell flagged product.
- **Dispute resolution:** The CMO shares resolution with OPC and the CO via email. If the contractor dispute is valid, the CO may rescind the modification or instruct the contractor to add the products back to the contract via a separate modification.