

Supply Chain Risk & Resolution: Removing Products with National Security Risks

Background

FAS regularly contacts Schedule contractors regarding products that may pose national security risks. The objective is to remove from contract:

- Products prohibited by law, regulation, or other binding directives
- Products that are “solely compatible” with prohibited products
- References to prohibited products from product descriptions and other product data

What is Prohibited?

- **Covered articles (i.e., Kaspersky):** as defined in [FAR 52.204-23](#)
- **Covered telecommunications and video surveillance equipment:** as defined in [Section 889 of the 2019 NDAA](#)
- **Solely compatible products:** Some products are not prohibited by the FAR, but are “solely compatible” with prohibited products. “Solely compatible” products can only fulfill their intended purpose in conjunction with another product(s).

Many products that contain **prohibited keyword references** are not actually prohibited. For example, a USB Wall Charger that lists several types of compatible phones, including Huawei, Google, and Microsoft phones is neither prohibited nor solely compatible with prohibited products. For these products, FAS will request that vendors remove the prohibited keyword (in this case “Huawei”) from the product description or other product data. The reasons for removing prohibited keywords are to minimize customer confusion and concern, and avoid FAS promotion or advertisement of prohibited products.

Automatic “Suppression” of Prohibited Products on GSA Advantage!®

Certain prohibited products that get added to GSA Advantage!® will not be visible to customers on the website. GSA has developed a process where products that have already been verified by GSA subject matter experts to be prohibited, or solely compatible with a prohibited product, are suppressed (i.e., hidden) from customer view on GSA Advantage!® and removed from the contract at a later date.

Process

During the life of your contract, FAS may email your Contact for Contract Administration and/or Authorized Negotiators regarding products with prohibited keyword references. FAS will seek to resolve national security concerns with prohibited products by requiring Schedule contractors to remove any and all references to the applicable covered entity (i.e., “Dahua”, “Hikvision”, “Huawei”, “Hytera”, “Kaspersky”, or “ZTE”) from the product description or other product data in your GSA *Advantage!*® catalog.

Schedule contractors will be given a definite time period in which to update their GSA *Advantage!* Catalog by removing keyword references. If you are contacted, please respond to GSA in accordance with the instructions in the email. Products may be deleted from your contract if you do not update your GSA *Advantage!*® catalog file via SIP within the designated time frame.