From the Editor

The warm weather is about to fade away and soon Fall will be in full swing. Fall means the start of a new Fiscal Year here at GSA. We are looking forward to starting off the new year by providing our vendors with useful information and sharing the latest hot topics in FAS contracting. In this 33rd issue of GSA Steps, you will learn about the recent changes in labeling hazardous materials, additional requirements for contractors on Small Business Set-aside orders, how to identify “green” products on GSA Advantage®, changes to the language in your Report Card regarding Green House Gases, and the new Contractor Teaming Arrangement Tool (CTAT). You will also read updates about the Steps to Success brochure, upcoming training offerings for contractors, how to correctly identify Paper Check & Electronic IFF Payments and OPEN. Enjoy this issue of GSA Steps.

Steps to Success Brochure Updated!

Currently you can access the new Steps to Success: Contractor Reference Guide via the Vendor Support Center website: https://vsc.gsa.gov/stepstosuccess.pdf

This reference guide is essential for any prospective and current Multiple Award Schedule contractor with information regarding:

- Whom you need to know in GSA and what their role is,
- Understanding certain contract requirements,
- How to keep your contract current,
- Marketing tips and insight,
- What you should know when working with government agencies, and
- How to get the support you need.

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Hazardous Material: Material Safety Data Sheets (MSDS) Changes

Do you ship Hazardous Materials? If you can answer yes to this question, did you know: On May 25, changes to the OSHA Hazardous Communication Standard took effect, bringing the U.S. rules into alignment with the Globally Harmonized System of Classification and Labeling of Chemicals. The new rules require chemical manufacturers to determine the hazards of the chemicals they produce, and to provide labels that include a signal word, pictogram, hazard statement and precautionary statement for each hazard class. MSDS will now be called “Safety Data Sheets (SDS)”, and the new SDS format will organize that information into 16 specific sections. Workers must be trained by December 1, 2013 on the new label elements and SDS format, while maintaining their ongoing Hazardous Communication Training.

GSA Global Supply will soon begin coordination efforts with industry, government and standards organizations to review and revise FED-STD-313, Material Safety Data, Transportation Data and Disposal Data for Hazardous Materials Furnished to Government Activities. The Department of Defense, in coordination with GSA, is already working to revise its internal Hazardous Communication Instruction. As these changes take effect, we can expect to see an impact to the Safety Data Sheet documents and/or value-added data being input into DoD’s online Hazardous Material Resource System database (HMIRS).

DoD’s database houses over 400,000 MSDS records and GSA processes thousands every year to facilitate user searches. It is regularly used to interface with other logistics, hazardous material and environmental databases, providing key data and hazardous material reports where needed. Customers needing MSDS support can use the resources below to get help.

“MSDS Request” by phone: 866-588-7659/ DSN 465-5097/ Comm. 816-926-5097

“MSDS Request” by e-mail: MSDS@gsa.gov

Online HMIRS Web site: http://www.dlis.dla.mil/hmirs/

Correctly Identifying Paper Check & Electronic IFF Payments

If you’re one of the few GSA contractors still remitting the IFF via paper check or electronic funds transfer (EFT), please include your Schedule contract number(s) and the associated reporting quarter(s) with your payment so the IFF can be promptly and accurately applied to your contract. A preferred option is to make online IFF payments at the Vendor Support Center (VSC) https://vsc.gsa.gov. The VSC will automatically include your Schedule contract number and the reporting quarter with your online IFF payment, so you won’t have to.
Did you know that there are clauses in your Schedule contract that add terms and conditions for you to comply with, but these clauses only apply when you perform on set-aside orders? For contractors who are, or expect to be, awarded small business set-aside Schedule orders, there are two main requirements that they should become familiar with: 1) limitation on subcontracting (LOS); and 2) the nonmanufacturer rule (NMR).

The LOS requirement refers to the condition that contractors who are awarded set-aside orders perform at least 50% of the work on that order. Depending on the type of a set-aside order (e.g. small, HubZone small, Service-Disabled Veteran-Owned small, etc.), the LOS requirement differs slightly. For specifics on exactly what the various set-aside clauses say about the LOS requirement, see FAR 52.219-3(d), 52.219-14(c), 52.219-27(d), 52.219-29(d), and 52.219-30(d).

The NMR only applies to set-aside orders for supplies where the contractor awarded the set-aside is not the manufacturer of the supplies to be provided under that order (i.e. nonmanufacturer). In this scenario, the NMR requires that the winning contractor not only provide the supplies of a small business manufacturer but that the small business manufacturer be located in the United States or its outlying areas. The FAR defines “outlying areas” as the commonwealths, territories, and outlying islands of the United States. Simply put, the NMR requires that on set-aside orders, contractors comply with the more stringent Buy American Act as opposed to the Trade Agreement Act that is normally applied to Schedule contracts and orders. Depending on the type of a set-aside order (e.g. small, HubZone small, Service-Disabled Veteran-Owned small, etc.), the NMR differs slightly. For specifics on exactly what the various set-aside clauses say about the NMR, see FAR 52.219-3(f), 52.219-6(d), 52.219-27(f), 52.219-29(f), and 52.219-30(f).

Both the LOS requirement and NMR exist in order to ensure that small businesses, and not large businesses, benefit from set-asides. Compliance with these two requirements are not only important aspects of overall contract compliance for contractors but they are indicators of success with regards to the implementation of small business set-asides under the Multiple Award Schedules Program as a whole.

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**contract**

**1. limitation on subcontracting**

**LOS**

50%

**2. the nonmanufacturer rule**

**NMR**

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**Buy American Act**

**FAR 52.219-3(f)**

**FAR 52.219-6(d)**

**FAR 52.219-27(f)**

**FAR 52.219-29(f)**

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**SET-ASIDES**

**clauses**

**FAR 52.219-3(d)**

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**MAS**

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**COMPLIANCE**
You have probably heard a lot about “going green,” “green purchasing,” or “sustainable acquisition” over the past couple of years. Have you ever wondered what it means for you as a Multiple Award Schedule (MAS) contractor? This article provides the basic information you need to know.

There is no time like the present to sell “green” products. Federal customers are now required to ensure that 95% of contract actions be “green.” This policy has driven a huge increase in the demand. In fact, sales of “green” products through GSA Advantage® increased 77% from October 2011 through May 2012!

What products are considered “green” by the federal government? EPA, USDA and DOE have established environmental programs and criteria for certain product categories. The best way to learn about these programs and the products they address is to visit GSA’s Green Product Compilation at http://sftool.gov/GreenProcurement. Type in your product or browse the product categories to see which are covered by an environmental program. It’s possible you sell a product that meets the recycled, biobased or other programs to be considered “green” and didn’t even realize it!

As a MAS contractor, it’s important to realize that GSAM Clause 552.238-72 requires you to accurately identify a product’s environmental attributes on GSA Advantage®, other ordering platforms and communication media. If a product is “green”, but isn’t identified in GSA Advantage®, you’re probably missing out on sales! Ensure that you are always listing the correct environmental icon as you want to provide your customers the right information. Note that you may need to do additional fact finding to confirm if your specific product meets the “green” requirements. Accuracy is the name of the game!

After you’ve reviewed your pricelist and you have confirmed your “green” offerings, it’s time to update your information in GSA Advantage®. If a product possesses an environmental attribute, or is certified to an environmental standard or eco-label not recognized by the federal government, you should include this information in the product description. The more “green” information the better!

If you review your pricelist in GSA Advantage® you will probably notice a “green” leaf icon by the product name in the search results. A product gets this leaf if one or more contractors offering that product selects a “green” icon. The product detail shows the specific “green” icons for each contractor. For many products, you may notice that some contractors have selected a “green” icon and others have not. If every contractor accurately identifies their “green” products they should all have the same icons. Clearly we have a lot of work to do to improve accuracy!

1 For dealers and resellers, you will generally rely on manufacturer information. Some programs like ENERGY STAR or WaterSense may include a label on product packaging. Other programs like BioPreferred (biobased content) or the Comprehensive Procurement Guidelines (recycled content) will require a review of the product specification. Regardless, you are responsible for ensuring accuracy!
New Enhancements to the Authorized Negotiator/Digital Certificate Process

The Authorized Negotiator/Digital Certificate verification process is being enhanced to update negotiator information more efficiently. When you access the eOffer/eMod application and need to be added as a negotiator, you will now be able to submit a request to an existing negotiator on the contract. If no negotiator(s) are listed on the contract, the request will go directly to your Contracting Officer/Contracting Specialist (CO/CS).

In this process, the negotiator’s details will be captured from their digital certificate. This includes their first name, last name, middle initial, and e-mail address. This is the current validation that is being checked upon login into the eOffer/eMod application. If any of this data does not match the digital certificate exactly, you will be denied access to the application. In the new process, the certificate’s details will be captured and transferred directly to an existing negotiator or the CO/CS to approve the request. This will eliminate the potential of manual errors in the cert information and ensure the negotiator’s information is added correctly the first time.

The new process will also assist an existing negotiator, who is already associated with the contract, but cannot access eOffer/eMod due to digital certificate issues. Using a series of new validations, if a match is found for at least one of the validation criteria, you will be able to select the appropriate information and submit it to existing negotiators for approval. If the existing negotiators do not take an action within seven (7) days to approve the update, the request is then sent directly to the CO/CS for approval. The CO/CS no longer has to manually input the data, they simply review the information, vet the person to ensure they should be legitimately added to the contract, then award the mod. The negotiator’s information is added to the contract and access is granted within 24 hours of approval.

For more information, reference the new Authorized Negotiator User Guide found on the eOffer homepage or at http://eoffer.gsa.gov/eoffer_docs/Guide_Links.html.

Update on the GHG question on the Report Card

During the past fiscal year, GSA introduced a Report Card question relating to Green House Gases (GHG): “Has the contractor conducted a GHG emissions inventory and established GHG reduction goal(s)?” The intent of this question was to raise awareness of GHG in coordination with initiatives to reduce the federal government’s GHG footprint. In the past months, after listening to industry’s feedback, GSA came to a better understanding of the lack of awareness and information available to you, leading to concern with this question.

In response, by the end of the calendar year, if not sooner, the question on GHG will be removed from the Report Card. As the GHG topic is vital to GSA and the federal government, the opportunity for discussion, awareness, and education will continue during Contractor Assistance Visits. In addition, our focus over the next year will be on developing robust and comprehensive information and resources on the subject, easily accessible to you. As always, it is important that we continue to work together and support each other as business partners.
Contractor Teaming Arrangements Tool: Respond to Complex Solicitations with the Right Team of Complementary Contractors

For the first time, MAS vendors can easily facilitate their contractor teaming arrangements. With GSA’s new Contractor Teaming Arrangements Tool, (CTAT), you can communicate your teaming requirements to a broad audience of MAS vendors; increasing your chances of finding other Schedule contractors that provide complementary products or services you need, allowing you to respond to a complex solicitation.

Using CTAT

Once your membership has been authenticated, you can begin posting and searching for teaming opportunities right from the group homepage.

Searching for Opportunities:

When you click “Opportunities” on the CTAT group homepage, it will lead you to all of the teaming opportunities that have been posted to date. Posts are listed in chronological order and can be easily sorted by category, date, etc. Each post offers detailed information and the ability to contact the vendor to learn more.

Remember to check back frequently as new opportunities are always being posted!

Posting Opportunities:

Under “Actions” on the right hand side, you’ll find “Create CTAT Opportunity.” Using this feature you can post teaming opportunities with basic contract information and documents. All replies to your post will be sent directly to your email.

Accessing CTAT

To begin using CTAT, go to interact.gsa.gov, log in, find the CTAT group homepage, then click “Join” on the right hand side. You will be asked to provide your MAS contract number and password. Please note this password is the one provided upon your contract award, not your Interact password. (Hint: this same password is used to access eBuy and SIP.) Click here to log in to the Interact CTAT homepage and get started today.

Other Helpful Links

Resources, Training and Tools for help with your GSA contract found here http://www.gsa.gov/portal/content/203017

More information about Contractor Teaming Arrangements found here http://www.gsa.gov/portal/content/200553

Frequently Asked Questions may answer your questions about Contractor Teaming Arrangements found here http://www.gsa.gov/portal/content/202257
OPEN Updates and other Acquisition Information

Instructional Letters

Curious about what new policies and procedures GSA Acquisition professionals are following? GSA FAS has made their Instructional Letters (ILs), which provide direction and procedures, to internal acquisition employees available online, in part of our transparency initiative. You can find these ILs at www.data.gov. One of the most recent posts is in support of the Options Processes Ensuring iNtegrity (OPEN) process. Contractors or any other interested parties can now search and view Instructional Letter (IL) 2012-06 Exercising the Option to Extend the Term of a Federal Supply Schedule (FSS) contract by clicking on this Web link, https://www.asap.gsa.gov/datagov/fas-il/Instructional%20Letter%20(IL)%202012-06.pdf.

Guidance on Bilateral Modifications Associated with Options

The option modification is a unilateral modification according to the FAR 43.103(b). This means that the modification cannot include any changes or information that would require negotiations (e.g. price reductions, economic price adjustments, deletions, additions, new terms and conditions). However, these types of actions are frequently uncovered at option time and must still be completed prior to the award of the option. If actions involving negotiations are required, these must be processed as a separate bilateral modification initiated by the contractor and considered by the Contracting Officer.

If a contractor has reason to believe that a bilateral modification will be required, they should contact their Contracting Officer prior to initiating the bilateral modification to determine which documentation will be required to complete it. This will help reduce the amount of back and forth between the contractor and the Contracting Officer and will reduce the number of modifications that are rejected due to incomplete or missing information. One of the goals of the OPEN process is to maintain the contract in a current, accurate and complete state and reduce the amount of additional paperwork contractors need to submit at option time. The more up to date a contract is, the easier the option process will be for both the contractor and the Contracting Officer.

Online Training Opportunities

Are you ever looking for additional training regarding your contract and the different acquisition rules that the federal government should be following? If so, did you know that since 2011, the Federal Acquisition Service has offered various courses through Web 2.0 technology and social media? These courses include information on various topics such as: Basic Contracting for GSA Schedules, GSA Schedules and Small Business, Sustainable Acquisition, Blanket Purchase Agreements, Contractor Team Arrangements, GSA Schedules eBuy, and many more. If you are interested, we invite you to visit the list of course offerings, available 24 hours a day/7 days a week, at: www.gsa.gov/masnews.

Another great place for information is Interact at: interact.gsa.gov. Here you can find multiple training opportunities and groups you can follow. A great group for any contractor is “Schedules Contractor Success – Marketing Matters.”

Finally, did you know that GSA has a YouTube channel? Over 88 MAS training videos are posted to our YouTube channel, which you can access through gsa.gov/schedules.