GSA Industry Partner Training Series
Acquisition Workforce Training Branch
FAS Office of Customer and Stakeholder Engagement

Sales Tracking Systems

March 6, 2019

Why Do I Have to Track and Report Sales?

- It's a contract requirement
- GSA is self-sufficient through the fees it collects
- The Industrial Funding Fee (IFF) is what funds the Schedules Program
  - IFF is paid by the customer
  - IFF = 0.75% of each transaction, tracked and reported by vendors
  - IFF is included in your contract pricing - it isn't a separate line item
- It will be reviewed during your Contract Assessment
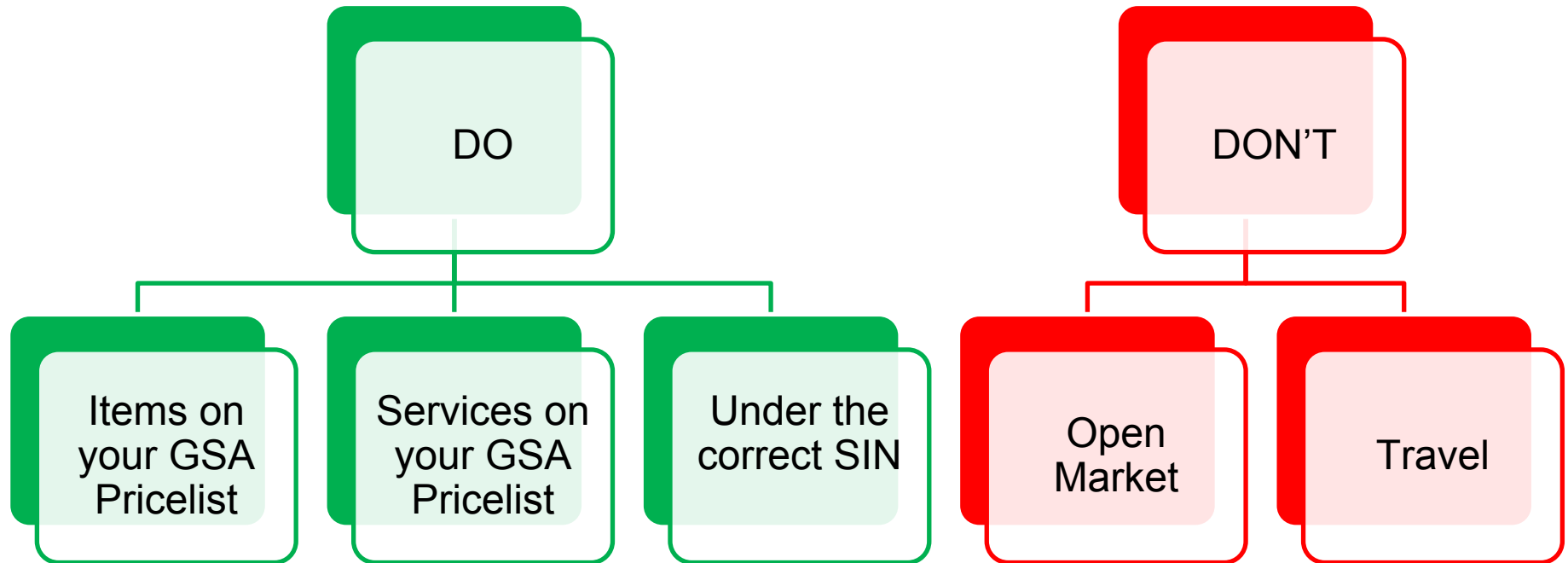
What Does the Contract Say?

- No specific contract requirement outlines the elements of an acceptable tracking system, however…
- 552.215-71, Examination of Records by GSA
  - Gives GSA the right to examine records to determine compliance with contract
- 552.238-74, Industrial Funding Fee and Sales Reporting
  - Requires vendors to track and report sales made against their contract
  - Doesn't specify HOW a sales tracking system should function - only that it DOES function

How Do I Know What to Report?

- A sale is reportable when the following criteria are met:
    - Contract items were sold
    - An eligible user made the purchase
    - No evidence that the customer intended to use a different contract

What Do I Report... What Don't I Report?

DO
- Items on your GSA Pricelist
- Services on your GSA Pricelist
- Under the correct SIN

DON'T
- Open Market
- Travel

Who's Eligible to Use My Contract?

- [ADM4800.2I](#) - Eligibility to Use GSA Sources of Supply & Services
  - Lists all agencies, activities, and organizations that have been determined to be eligible to use GSA sources of supply
  - Army, Navy, Department of Education, etc
  - Also eligible non-governmental or quasi-governmental groups
- This group is called "Eligible Users"

What About State and Local Governments?

- Certain programs allow State/Local users access to Schedules:
  - Cooperative Purchasing
  - Disaster Recovery
  - Public Health Emergencies
  - 1122
- The GSA Programs for State and Local website provides information on the various programs available to state and local customers
- This group is called "State and Local Users"

Reporting Rules

The rules are slightly different, depending on which group:

- <u>Eligible User Group</u> - If contract items are sold, and there is no evidence of any other procurement vehicles in use, then it will be a reportable sale. In this situation, sales are reportable unless there is clear evidence otherwise.

- <u>State & Local Group</u> - This is basically the opposite - there has to be evidence that the customer intended to utilize the MAS contract. Absent any explicit evidence, regardless of whether or not contract items were sold, it will not be considered a reportable sale.

The "Evidence" Explained

"Evidence" in this case begins with the delivery or task order. Let's look at a few scenarios to see how this could play out in the real world:

Scenario #1:

- **It's an eligible user, the MAS contract number is listed on the order, and contract items were sold**.

- This is a clear indication that the customer intended to purchase items from the MAS contract.

- Reportable sale.

Another Example

Scenario #2:

- **It's an eligible user, but no contract number is listed on the order and contract items were sold.**

- The fact that the customer did not indicate they intended to utilize the MAS contract is irrelevant.

- Any sale of contract items to an eligible user, without affirmative evidence of another contracting/procurement vehicle, will be considered a reportable sale.

And Another One

Scenario #3:

- **Eligible user; mixed order of contact items and open market items**.

- Contract number may or may not be listed on order, no evidence of other contract vehicles being used.

- The contact items are reportable, the open market items are not.

Last One

Scenario #4:

- **Eligible user; contract items are sold, but the order lists a contract number that is <u>not</u> your MAS contract number**.

- This order was purchased using a different procurement vehicle (another agency's contract).

- Regardless of how it was quoted, it is not a reportable sale. Track it separately.

What Does a Working Sales Tracking System Look Like?

- It's different for each vendor
- Ask yourself these questions:
  - How will you identify and track reportable sales in your system?
  - How will you train your sales staff on GSA requirements?
  - How will you extract reportable sales when it's time to report?
  - How will you ensure your reports are accurate and complete?
  - What will you do if you find errors or oversights?
- It is impossible to define every scenario because every situation must be evaluated accordingly

Sales Tracking System Summary Requirements

- Identifies, tracks, and reports GSA sales accurately and completely
    - Reports all transactions within the proper period
    - Retrieves data easily
    - Separates Schedule sales from other federal sales and commercial sales
- This can be as simple or complex as it needs to be - it depends on your business

What System do I use to Report Sales?

Some contractors will use the 72A system

- Summary level data
- Quarterly reporting

Other contractors will use FAS Sales Reporting

- Transactional data detail (Transactional Data Reporting, or TDR)
- Monthly reporting

If you aren't sure which system your contract uses, check on the VSC.
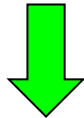
Where Can I Find More Info...

- GSA resources
  - This webinar
  - gsa.gov and vsc.gsa.gov
  - The Vendor Support Center (vsc.gsa.gov)
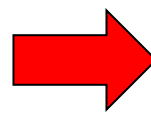 - Your Contracting Officer
- The next slide...

Start Here
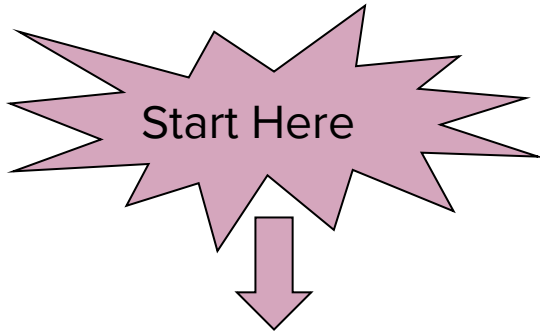
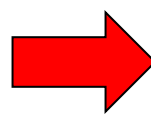Is the customer eligible to use the MAS contract? — No → Not a reportable MAS sale

Yes ↓

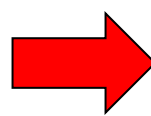Is the product or service being sold on the contract pricelist? — No → Not a reportable MAS sale

Yes ↓

Is there evidence of another contracting vehicle in place? — Yes → Not a reportable MAS sale

No ↓

Reportable MAS Sale

Questions?