



Office of Audits
Office of Inspector General
U.S. General Services Administration

Multiple Award Schedule Contracts Offered Prohibited Items, Putting Customers at Risk of Unauthorized Surveillance by Foreign Adversaries

Report Number A220016/Q/6/P23002
July 10, 2023

Executive Summary

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Why We Performed This Audit

GSA's Federal Acquisition Service (FAS) is responsible for ensuring regulatory compliance related to items that contractors include on its Multiple Award Schedule (MAS) contracts. This is especially important with the increase in national security and intellectual property threats to the federal government's supply chain.¹ In 2017 and 2018, Congress passed laws that prohibit the federal government's procurement of certain telecommunications and video surveillance services or equipment (telecom items) from certain named entities.² In our *Assessment of GSA's Management and Performance Challenges for Fiscal Year 2021 and 2022*, we listed managing supply chain risk as a management challenge and noted that FAS is challenged with identifying and removing prohibited telecom items and contractors from government-wide contracts. Given FAS's responsibility and the challenge these laws present, we included this audit in our *Fiscal Year 2021 Audit Plan*. We performed this audit to determine if FAS is complying with laws, regulations, and policies to ensure that MAS contracts do not offer prohibited telecom items.

What We Found

Federal laws and the Federal Acquisition Regulation (FAR) prohibit the procurement of certain telecom items that foreign adversaries could use for unauthorized surveillance. Two of the primary methods that FAS relies on to ensure that MAS contracts do not include prohibited telecom items are contractor self-certifications in GSA's System for Award Management and the Prohibited Products Robomod (Robomod) process. However, the self-certifications are inadequate and the Robomod process is insufficient to prevent contractors from including prohibited telecom items on their MAS contract price lists.

In addition, we found problems with FAS's efforts to address prohibited telecom items offered on MAS contracts. We found that:

- FAS has not taken adequate actions against contractors that repeatedly violate the FAR restrictions on providing or using prohibited telecom items;

¹ A supply chain is a network of companies and people that are involved in the production and delivery of a product or service.

² National Defense Authorization Act for Fiscal Year 2018 (P.L. 115-91) and John S. McCain National Defense Authorization Act for Fiscal Year 2019 (P.L. 115-232).

- FAS does not have a process in place to notify customer agencies about their purchases of prohibited telecom items; and
- FAS did not initially comply with FAR requirements to include subsidiaries and affiliates of named entities in its efforts to identify prohibited telecom items on MAS contracts.

Based on these findings, FAS should strengthen controls and take additional steps to minimize the risk of customer agencies procuring prohibited telecom items that foreign adversaries may use for unauthorized surveillance.

What We Recommend

We recommend that the FAS Commissioner:

1. Strengthen FAS's Robomod process to ensure that it identifies MAS contracts with prohibited telecom items.
2. Establish and enforce procedures and internal controls to:
 - (a) Ensure that contract modifications are issued promptly when FAS identifies prohibited telecom items on MAS contracts, and
 - (b) Ensure that contractors promptly remove prohibited telecom items from MAS contract price lists.
3. Implement more stringent consequences for contractors that repeatedly attempt to offer prohibited telecom items, including executing General Services Administration Acquisition Regulation clause 552.238-79, *Cancellation*.
4. Implement a process to instruct contractors that violate the FAR restrictions on the procurement of prohibited telecom items to notify and remit refunds to any customer agencies that purchased prohibited telecom items after the FAR was updated regarding named entities.
5. Identify items offered from subsidiaries and affiliates of named entities and either cancel the subject contract or remove the prohibited items from MAS contracts.

The FAS Commissioner agreed with our recommendations and provided general comments on FAS's internal controls and efforts in this subject area. These comments did not affect our findings and conclusions. FAS's response is included in its entirety in **Appendix B**.

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Introduction

We performed an audit of the actions GSA's Federal Service Acquisition (FAS) has taken to ensure that Multiple Award Schedule (MAS) contracts do not include prohibited telecommunications and video surveillance services or equipment (telecom items).

Purpose

In 2017 and 2018, Congress passed the National Defense Authorization Act for Fiscal Year 2018 (2018 NDAA) and the John S. McCain National Defense Authorization Act for Fiscal Year 2019 (2019 NDAA). In accordance with these laws, the Federal Acquisition Regulation (FAR) prohibits the federal government's procurement of certain telecom items from named entities. As the procurement agency for the federal government, GSA is responsible for ensuring that contractors comply with the federal prohibition of certain telecom items on MAS contracts. Therefore, we included this audit in our *Fiscal Year 2021 Audit Plan*.

Objective

The objective of this audit was to determine if FAS is complying with laws, regulations, and policies to ensure that MAS contracts do not offer prohibited telecom items.

See **Appendix A** – Objective, Scope, and Methodology for additional details.

Background

Between October 2018 and February 2022, the federal government spent approximately \$7 billion on telecom items procured through FAS's MAS Program. During this same period, there has been an increase in national security and intellectual property threats to the federal government's supply chain of these telecom items. To mitigate the supply chain risks, the federal government has enacted laws, implemented regulations, and developed various policies.

FAS's MAS Program

FAS administers the MAS Program, which provides federal agencies with a streamlined process for obtaining nearly 64 million commercial products and services. Under the MAS Program, FAS awards long-term, government-wide contracts with pre-negotiated prices, delivery terms, and warranties. MAS contracts also include other terms and conditions, like the FAR restrictions that prohibit MAS contractors from providing prohibited telecom items.

The MAS Program requires contractors to publish an Authorized Federal Supply Schedule Price List (price list), which contains the products and services offered to MAS customer agencies. When an MAS contractor wants to add new products or services, remove existing products or

services, or change the pricing of products or services, it must submit a contract modification to the FAS contracting officer for review and approval. Once approved, the price list is uploaded into GSA’s online shopping service, GSA Advantage!, which allows customer agencies to place orders for products and services offered under MAS contracts.³

Products and services offered through the MAS Program are divided into specific categories. FAS aligns these categories to North American Industry Classification System codes to simplify the buying and selling process for products and services MAS contractors offer.⁴

Figure 1 lists the MAS Program telecom categories, which accounted for approximately \$7 billion in MAS Program sales during our October 2018 through February 2022 audit period.

Figure 1 – MAS Program Telecom Categories

Category	Description
33411	Purchasing of New Electronic Equipment
333314NV	Night Vision Equipment
334220	Surveillance Systems, Wearable Body Cameras, and Vehicular Video
334310	Professional Audio/Video Products
334511	Search, Detection, Navigation, Guidance, Aeronautical and Nautical Systems and Instruments
334511T	Telecommunications Equipment
517312	Wireless Mobility Solutions
517410	Commercial Satellite Communications Solutions (COMSATCOM)
532420L	Leasing of New Electronic Equipment
541370GEO	Earth Observation Solutions
541990AV	Professional Audio/Video Services
561621H	Harbor/Waterfront Security Products and Services and Professional Marine Security Services

Supply Chain Risk Management

Section 1634 of the 2018 NDAA prohibits the federal government’s use of Kaspersky Lab hardware, software, or services, effective October 1, 2018. Section 889 of the 2019 NDAA prohibits the federal government’s procurement and use of certain telecom items from the following entities:

- Huawei Technologies Company;
- ZTE Corporation;

³ Customer agencies may access GSA Advantage! through the FAS home page at <http://www.gsa.gov/fas> or the GSA Multiple Award Schedule home page at <http://www.gsa.gov/schedules>.

⁴ The North American Industry Classification System classifies business establishments to collect, analyze, and publish statistical data related to the U.S. business economy.

- Hytera Communications Corporation;
- Hangzhou Hikvision Digital Technology Company; and
- Dahua Technology Company.

The 2019 NDAA prohibits the federal government from procuring certain telecom items from these entities, effective August 13, 2019, and further restricts the federal government from having contracts with entities that use these prohibited telecom items, effective August 13, 2020. The prohibitions in both the 2018 and 2019 NDAs also apply to the subsidiaries and affiliates of each of the six named entities above.

In accordance with these laws, the FAR restricts MAS contractors from providing or using any prohibited telecom items from the six named entities and their subsidiaries and affiliates. FAR 4.20, *Prohibition on Contracting for Hardware, Software, and Services Developed or Provided By Kaspersky Lab*; and FAR 4.21, *Prohibition on Contracting for Certain Telecommunications and Video Surveillance Services or Equipment*, implement the procurement and use restrictions specified in the 2018 and 2019 NDAs and direct contracting officers to insert the following clauses and provisions into government solicitations and contracts, as applicable:

- FAR 52.204-23, *Prohibition on Contracting for Hardware, Software, and Services Developed or Provided by Kaspersky Lab and Other Covered Entities*;
- FAR 52.204-24, *Representation Regarding Certain Telecommunications and Video Surveillance Services or Equipment*;
- FAR 52.204-25, *Prohibition on Contracting for Certain Telecommunications and Video Surveillance Services or Equipment*; and
- FAR 52.204-26, *Covered Telecommunications Equipment or Services-Representation*.

FAS Internal Controls Related to Supply Chain Risk Management

According to GSA, the FAS Office of Policy and Compliance (OPC) manages supply chain risk through policy, processes, special projects, and new tools and technologies. The OPC developed the Supply Chain Risk Management program with the intent to support FAS's efforts to improve acquisition performance and manage supply chain risks such as cyber-related threats involving prohibited telecom items. FAS provided information on several preventive and detective internal controls it uses to manage supply chain risk, some of which we discuss below.

Preventive internal controls. FAS relies on the provision in FAR 52.204-26, which requires a contractor to self-certify in GSA's System for Award Management (SAM) if it provides or uses telecom items that are prohibited under the 2019 NDAA. In addition, FAR 52.204-23 requires a contractor to self-report if it provides or uses items identified in the 2018 NDAA. FAS management and the contracting staff rely on these self-certifications and reporting clauses to ensure prohibited telecom items are not provided or used in relation to MAS contracts.

GSA also recognizes the supply chain risk and has implemented internal controls to reduce that risk. On August 13, 2020, GSA issued Acquisition Letter MV-20-10, *Workforce Guidance on FY2019 NDAA Section 889 "Part B,"* which mandates training of FAS contracting personnel on the prohibited telecom items and the FAR's related requirements, including representations, exceptions, reporting, and enforcement.

Finally, FAS contracting officers have a responsibility for monitoring contract compliance. At the time of contract award or when a contractor requests to add a new product or submits a new price list, the contracting officer should ensure that prohibited telecom items are not present on the contract. Contracting officers serve as the primary internal control as they have the ability and responsibility to remove prohibited telecom items or cancel contracts as they deem appropriate. Nevertheless, the OPC Assistant Commissioner told us that the sole responsibility for compliance is with the contractor since compliance is a contractual requirement.

Detective internal controls. In addition to preventive internal controls, FAS uses detective internal controls to identify and remove prohibited telecom items from MAS contracts. We examined two of these internal controls: (1) Prohibited Products Robomod process and (2) On-Demand Contract Assessments.

Prohibited Products Robomod. OPC developed a Prohibited Products Robomod (Robomod) process that flags potentially prohibited telecom items included on GSA Advantage! based on keyword searches. The process is intended to remove prohibited telecom items and solely compatible products from government contracts.⁵ When the process identifies a potentially prohibited telecom item, subject matter experts in FAS's Office of Information Technology Category review the item to verify if it is prohibited. If it is deemed prohibited, FAS suppresses the item on GSA Advantage! to hide it from view so customer agencies cannot purchase the item. After suppression, FAS creates a contract modification for the contracting officer's signature to modify the contract and officially remove the item. FAS then issues the modification to the contractor. While the Robomod process suppresses the prohibited telecom item from GSA Advantage!, the MAS contractor must also remove the item from its contract price list once FAS issues the modification. This prevents customer agencies from purchasing the item outside of GSA Advantage! and through other contract vehicles.

The Robomod process generally occurs quarterly but can be adjusted as needed. From November 2018 through February 2022, FAS performed nine rounds of the Robomod process. During that time period, the Robomod process flagged 2,787 total items from 131 MAS contracts. FAS identified 32 of these items as prohibited telecom items. These items were offered under 23 contracts on GSA Advantage!. The 32 prohibited telecom items included computer monitors, antivirus software, and other similar telecom items.

⁵ Solely compatible products are items that can only fulfill their intended purpose in conjunction with another product(s). For example, a small pluggable module that only functions with a telecommunications product from a named entity is considered solely compatible. FAR 4.20 or 4.21 does not prohibit solely compatible products.

On-demand contract assessments. FAS also developed a process to assess MAS contractors that repeatedly added prohibited telecom items on GSA Advantage!. After a contractor is identified through the Robomod process as repeatedly uploading prohibited items to GSA Advantage!, an FAS industrial operation analyst performs an on-demand contract assessment of the contractor. According to FAS officials, the purpose of the assessment is to educate the contractor on the FAR restrictions for prohibited telecom items. As of February 2022, FAS has conducted on-demand contract assessments of 26 MAS contractors identified as repeat offenders through the Robomod process.⁶

FAS Policy on Contract Compliance Issues

On January 11, 2022, FAS issued Procurement Information Notice 2022-02, *Contracting Officer Guidance for Addressing Contract Compliance Issues in Federal Supply Schedule Contracts* (PIN 2022-02), which provides contracting officers with guidance for addressing contractors who repeatedly offer prohibited telecom items. PIN 2022-02 suggests a sequence of actions for contracting officers to take based on the number of offenses a contractor has committed.

One suggested action is for the FAS contracting officer to issue a letter of concern to the contractor for each offense, with follow-on actions suggested for each additional offense. For example, for a contractor's fourth offense, PIN 2022-02 suggests that the contracting officer notify the contractor that FAS will not exercise the contract's upcoming option period. The guidance also states that contracting officers have the discretion to tailor a remedy to address particular circumstances, such as starting with a stronger consequence if contractor noncompliance is severe.

⁶ The 26 contractors included 9 of the 23 contractors identified through the Robomod process as offering prohibited telecom items. The other 17 contractors FAS identified for on-demand contract assessments offered solely compatible items, not prohibited telecom items.

Results

Federal laws and the FAR prohibit the procurement of certain telecom items that foreign adversaries could use for unauthorized surveillance. Two of the primary methods that FAS relies on to ensure that MAS contracts do not include prohibited telecom items are contractor self-certifications in SAM and the Robomod process. However, the self-certifications are inadequate and the Robomod process is insufficient to prevent contractors from including prohibited telecom items on their MAS contract price lists.

In addition, we found problems with FAS's efforts to address prohibited telecom items offered on MAS contracts. We found that:

- FAS has not taken adequate actions against contractors that repeatedly violate the FAR restrictions on providing or using prohibited telecom items;
- FAS does not have a process in place to notify customer agencies about their purchases of prohibited telecom items; and
- FAS did not initially comply with FAR requirements to include subsidiaries and affiliates of named entities in its efforts to identify prohibited telecom items on MAS contracts.

Based on these findings, FAS should strengthen controls and take additional steps to minimize the risk of customer agencies procuring prohibited telecom items that foreign adversaries may use for unauthorized surveillance.

Finding 1 – MAS contracts included prohibited telecom items because SAM self-certifications are inadequate and FAS's Robomod process is insufficient.

To comply with the FAR, FAS relies on contractor self-certifications in SAM and the Robomod process, among other things, to ensure that prohibited telecom items are not offered through MAS contracts. However, we examined a sample of 34 MAS contracts and identified 4 contracts (12 percent) that, at the time of our testing, had prohibited telecom items on their contract price lists. In addition, we found 12 potentially prohibited telecom items offered on GSA Advantage!. Therefore, we determined that the self-certifications are inadequate and the Robomod process is insufficient because MAS contracts still include prohibited telecom items.

FAS's Reliance on Contractor Self-Certifications in SAM Is Inadequate

In each of the 23 contracts FAS identified with prohibited telecom items, the contractor self-certified in SAM that it did not provide or use prohibited telecom items. Thus, FAS should not rely solely on the SAM self-certifications. FAS is responsible for ensuring that MAS contracts include items that comply with federal laws and regulations. For that reason, FAS should establish additional procedures to ensure that MAS contracts comply with federal regulations and are free from prohibited telecom items, rather than relying on contractor self-certifications.

FAS's Robomod Process Is Insufficient

The Robomod process is insufficient because: (1) FAS does not ensure that contractors remove prohibited telecom items from their MAS contract price lists after the Robomod process identifies a prohibited item, (2) the Robomod process does not flag all potentially prohibited telecom items offered on GSA Advantage!, and (3) FAS encountered lengthy delays to remove prohibited items from MAS contracts and contract price lists once identified by the Robomod process. We discuss these issues in detail below.

FAS does not ensure that contractors remove prohibited telecom items from their MAS contract price lists after the Robomod process identifies a prohibited item. We found that four MAS contractors offered prohibited telecom items on their contract price lists. In two of the four cases, the MAS contractors included prohibited telecom items on contract price lists even after the Robomod process flagged them and FAS personnel suppressed the prohibited telecom items on GSA Advantage!. We discuss the details below:

- **Contract Number GS-07F-093CA.** This MAS contractor resells telecom items from two manufacturers, including software licenses from a named entity. The contractor self-certified in SAM that it does not provide or use prohibited telecom items. However, the contractor uploaded a prohibited telecom item on its contract to GSA Advantage! multiple times from August 2020 to September 2021 after the Robomod process detected prohibited telecom items. FAS issued two modifications to remove the prohibited telecom item from the contract (one modification in December 2020 and January 2022, respectively), yet as of July 21, 2022, the item remained on the contract price list.
- **Contract Number GS-02F-0151U.** This MAS contractor resells telecom items from a variety of manufacturers, including 21 various types of prohibited antivirus software. The Robomod process detected prohibited telecom items and FAS suppressed these prohibited telecom items from GSA Advantage! multiple times from August 2020 to May 2021. FAS issued three modifications to remove the prohibited telecom items from the contract price list (one modification in December 2020, April 2021, and September 2021, respectively), yet the items remained on the contract price list until March 2, 2023.
- **Contract Number GS-02F-123AA.** This MAS contractor resells telecom items from a variety of manufacturers. We identified nine types of prohibited antivirus software on the contractor's contract price list.
- **Contract Number GS-35F-0122X.** This MAS contractor resells telecom items from a variety of manufacturers. The contractor self-certified in SAM that it does not provide or use prohibited telecom items. However, we identified three prohibited telecom items among the telecom items this contractor offers on its MAS contract. All three prohibited telecom items are modems that FAS suppressed in GSA Advantage! in January 2022. While FAS issued a modification to remove the prohibited modems from this contractor's MAS

contract on September 1, 2022, a new contract price list has not been uploaded as of March 29, 2023.

After we brought the prohibited items for these contracts to its attention, FAS approved updated price lists for contract numbers GS-07F-093CA, GS-02F-0151U, and GS-02F-123AA, removing the previously identified prohibited items. In addition, FAS issued a modification to cancel contract number GS-35F-0122X effective March 31, 2023, pending completion of existing purchase agreements. An FAS OPC Acquisition Policy Division official who leads the Robomod process told us that FAS does not have a process in place to ensure that contractors remove prohibited telecom items from MAS contract price lists after FAS issues the contract modification to remove the prohibited telecom items. As a result, MAS contract price lists for the four identified contracts still included prohibited telecom items flagged by the Robomod process prior to our reporting this issue to FAS.

The Robomod process does not flag all potentially prohibited telecom items offered on GSA Advantage! Despite FAS’s Robomod process, which flagged and suppressed a large number of items, we still identified 12 potentially prohibited telecom items offered on GSA Advantage!. Of the 12 items the Robomod process did not identify, 2 items had named entities listed in the item descriptions on GSA Advantage!. In addition, MAS contractors uploaded 10 previously flagged and suppressed prohibited telecom items back to GSA Advantage! under different part numbers, which avoided detection by the Robomod process.

The Robomod process did not identify two potentially prohibited telecom items. We performed a search in GSA Advantage! for the five entities named in the 2019 NDAA. We used the same key terms FAS uses during the Robomod process and found two items with named entities listed in the item descriptions on GSA Advantage! (see Figure 2). When we questioned FAS about this, an FAS OPC Acquisition Policy Division official did not confirm or deny that the items were prohibited; instead, they included the item numbers in their list of key terms for the next Robomod search. The same FAS official later stated that only one of the items was prohibited. As of the date of this report, the two items we identified are no longer on GSA Advantage!.

Figure 2 – GSA Advantage! Items Not Identified by the Robomod Process as Potentially Prohibited Telecom Items

Part Number	Description	Named Entity	Contract Number
DHINVD0105DH4K	Video Decoder	Dahua Technology Company	GS-02F-123AA
07-111-5200	Adapter	ZTE Corporation	47QTCA21D00FK

MAS contractors uploaded 10 previously flagged and suppressed prohibited telecom items back to GSA Advantage! under different part numbers. We searched GSA Advantage! for all 32 prohibited telecom items that FAS identified during the nine Robomod searches performed during our audit period. Even though FAS suppressed these items in GSA

Advantage!, 10 of the 32 items (31 percent) were offered by multiple contractors under slightly different part numbers (see *Figure 3*).

Figure 3 – Prohibited Telecom Items Added Back to GSA Advantage! Under Different Part Numbers

Previous Part Number	New Part Number	Description
SFP-GE-LXSM1310A-ENT	SFP-GE-LXSM1310A-ENT ING1A3130	SFP Module for Data Networking
SFP-GE-LX-SM1310-A-ENT	SFP-GE-LXSM1310A-ENT ING1A3130	SFP Module for Data Networking
USG110	ICAS1YUSG110C	1 Year Anti-Spam Card
USG1900	ICAS1YUSG1900C	1 Year Anti-Spam Card
USG210	ICAS1YUSG210C	1 Year Anti-Spam Card
USG310	ICAS2YUSG310C	2 Year Anti-Spam Card
USG40	ICAS1YUSG40C ICCF1YUSG40C ICID1YUSG40	1 Year Anti-Spam Card
USG40W	USG40WNB	Wireless Security Gateway
USG60	ICAS1YUSG60C ICCF1YUSG60C ICID1YUSG60	1 Year Anti-Spam Card
USG60W	USG60WNB	Wireless Dual Radio

During our audit fieldwork, an FAS OPC Acquisition Policy Division official agreed that the telecom items with slightly different part numbers were prohibited and explained that FAS’s failure to identify the different part numbers was likely due to a system issue with how GSA Advantage! identifies part numbers.

GSA assigns each unique part number a Goods and Services Identification Number (GSIN) in GSA Advantage!, and the Robomod process identifies previously flagged prohibited telecom items by GSIN. An FAS OPC Acquisition Policy Division official stated that:

These products appear to be identical to products that were determined to be prohibited under a previous Robomod. However, the products received a new GSIN because of changes to the manufacturer name, part number or unit of issue. The new GSIN was not on the suppression list and, therefore, the products were not suppressed from GSA Advantage [sic]. It is unclear if the manufacturing part numbers were intentionally revised.

The same FAS official stated that FAS plans to take a series of corrective actions related to this issue. Upon further review of these items, the same FAS official told us that only 2 of the 10 items added back under new part numbers still include prohibited software. The same FAS official also informed us of FAS’s plan to implement an additional internal control to

significantly reduce instances of prohibited products from being uploaded to GSA Advantage!. Since many MAS contractors offer telecom items, this issue could potentially affect multiple MAS contracts. FAS needs to address this issue immediately.

FAS encountered lengthy delays to remove prohibited items from MAS contracts and contract price lists. Once FAS identified prohibited telecom items using the Robomod process, we found lengthy delays in the time it took for: (1) FAS to issue a modification to remove a prohibited telecom item from a MAS contract, and (2) the contractor to remove a prohibited item from its MAS contract price list once FAS issued the modification.

For example, using the Robomod process, FAS identified a prohibited telecom item on GSA Advantage! offered under Contract Number 47QTCA19D00JN. FAS suppressed the item from view on February 4, 2022. Yet, it was not until May 19, 2022—more than 3 months later—when FAS issued a modification to the contractor to remove the item from its contract. In another example, after identifying a prohibited telecom item on Contract Number 47QTCA18D009F, FAS issued a modification to remove the prohibited telecom item from the contract on September 14, 2021. Despite the contractual requirement for contractors to remove the prohibited telecom item from their contract price lists within 30 days, it took the contractor 140 days—over four times as long—to remove the item.

Every day these actions are delayed puts customer agencies at risk of unknowingly purchasing prohibited telecom items from MAS contracts. Therefore, FAS should ensure that: (1) it promptly submits contract modifications to have the prohibited items removed and (2) contractors promptly remove the prohibited telecom items from their contract price lists.

Finding 2 – FAS faces additional challenges in its efforts to address prohibited telecom items offered on MAS contracts.

We found additional problems with FAS’s efforts to address prohibited telecom items offered on MAS contracts. Specifically, FAS has not taken adequate actions against contractors that repeatedly violate the FAR restrictions on providing or using prohibited telecom items. In addition, FAS does not have a process in place to notify customer agencies about their purchases of prohibited telecom items. Lastly, FAS’s efforts to identify prohibited telecom items on MAS contracts did not initially comply with FAR requirements to include subsidiaries and affiliates of named entities.

FAS Has Not Taken Adequate Actions against Contractors That Repeatedly Violate the FAR Restrictions on Providing or Using Prohibited Telecom Items

FAS industrial operations analysts (IOAs) perform on-demand contractor assessments of contractors who repeatedly attempt to upload prohibited telecom items to GSA Advantage!. These assessments are intended to educate contractors on the FAR restrictions for prohibited telecom items; however, they have not been completely effective in removing products from MAS contract price lists.

As discussed earlier in this report, we found that 4 of the 26 MAS contractors that received IOA assessments as a result of offering prohibited telecom items continued to include these items on their contract price lists even after the assessments. For one of the IOA assessments, the contractor did not respond to the IOA's contact attempts and the IOA made no additional attempts to contact the contractor. In this case, the IOA assessment was ineffective and the prohibited telecom items continued to be listed on the MAS contract price list.

On January 11, 2022, FAS issued PIN 2022-02, which provides contracting officers with suggested actions for addressing repeat offenders. This guidance does not include associated time limits for taking action against these MAS contractors. As a result, FAS personnel are not taking adequate action against repeat offenders. FAS should revisit PIN 2022-02 to ensure it provides contracting officers with appropriate instructions to take prompt actions against contractors that repeatedly attempt to offer prohibited telecom items on MAS contracts.

FAS Does Not Have a Process in Place to Notify Customer Agencies About Their Purchases of Prohibited Telecom Items

FAS does not have a process in place to notify or remit refunds to customer agencies who purchase prohibited telecom items. From November 2018 through February 2022, FAS identified 23 contracts offering 32 prohibited telecom items. When we asked about the steps FAS takes to seek out or inform customer agencies about the risks associated with purchasing a prohibited telecom item, an FAS OPC Acquisition Policy Division official told us that FAS does not track customer agencies that purchased prohibited telecom items.

FAS is aware of at least one case where a customer agency purchased prohibited telecom items from an MAS contract after the FAR restrictions took effect. Given the continued availability of the prohibited telecom items on MAS contracts, it is likely that other customer agencies may have purchased—and are possibly using—prohibited items without their knowledge. FAS should instruct the 23 MAS contractors to notify and remit refunds to any customer agency that purchased prohibited telecom items after the subject FAR restrictions took effect.

FAS Did Not Initially Comply With FAR Requirements to Include Subsidiaries and Affiliates of Named Entities in its Efforts to Identify Prohibited Telecom Items on MAS Contracts

The FAR explicitly prohibits procuring and using telecom items from named entities and their subsidiaries and affiliates. While these restrictions took effect in August 2019, FAS did not implement procedures to identify telecom items from subsidiaries and affiliates of named entities until over 2 years later, in February 2022.

The OPC issued a decision paper, *Addressing Products of Section 889 Affiliates and Subsidiaries on Multiple Award Schedule (MAS) Schedules*, to the FAS Commissioner on February 2, 2022. The decision paper recommends cancelling the contracts or removing the prohibited telecom items of known affiliates and subsidiaries of the named entities noted in the FAR. It states:

Using this working list, we recommend advising contracting officers to cancel or terminate prohibited telecommunications equipment of affiliates and subsidiaries of the prohibited entities that are being sold on MAS contracts and are listed on GSA Advantage!. Previously, FAS contracting officers have only cancelled prohibited technology produced by entities specifically named in Section 889, and this shift to remove prohibited technology produced by affiliates and subsidiaries of Section 889 entities will be new.

One subsidiary of a named entity had approximately \$87,000 in GSA schedule sales under Contract Number GS-35F-0400S in Fiscal Year 2020 for MAS categories that offer telecom items. FAS did not cancel this contract until March 2022. Therefore, this contractor could have sold prohibited items to unknowing customer agencies during this nearly 2.5-year time frame.

With over 400 known affiliates and subsidiaries of the named entities, the risk of purchasing and using prohibited telecom items greatly increases, as does the risk of unauthorized surveillance of customer agencies by foreign adversaries. Therefore, FAS should continue its efforts to identify and remove from all MAS contracts any prohibited telecom items from subsidiaries and affiliates of the named entities.

Conclusion

Federal laws and the FAR prohibit the procurement of certain telecom items that foreign adversaries could use for unauthorized surveillance. Two of the primary methods that FAS relies on to ensure that MAS contracts do not include prohibited telecom items are contractor self-certifications in SAM and the Robomod process. However, the self-certifications are inadequate and the Robomod process is insufficient to prevent contractors from including prohibited telecom items on their MAS contract price lists.

In addition, we found problems with FAS's efforts to address prohibited telecom items that are offered on MAS contracts. We found that:

- FAS has not taken adequate actions against contractors that repeatedly violate the FAR restrictions on providing or using prohibited telecom items;
- FAS does not have a process in place to notify customer agencies about their purchases of prohibited telecom items; and
- FAS did not initially comply with FAR requirements to include subsidiaries and affiliates of named entities in its efforts to identify prohibited telecom items on MAS contracts.

Based on these findings, FAS should strengthen controls and take additional steps to minimize the risk of customer agencies procuring prohibited telecom items that foreign adversaries may use for unauthorized surveillance.

To address these issues, FAS needs to take steps to strengthen its efforts to eliminate prohibited telecom items offered on MAS contracts. FAS should establish monitoring procedures and internal controls to ensure it issues contract modifications as soon as FAS identifies prohibited telecom items on MAS contracts. FAS should also confirm that contractors remove these items from MAS contract price lists. In addition, FAS should implement a process to instruct contractors to notify and remit refunds to customer agencies that purchased prohibited telecom items after the FAR restrictions were implemented. Further, FAS should implement more stringent consequences for contractors that repeatedly attempt to offer prohibited telecom items. Lastly, FAS should continue to identify and remove any prohibited telecom items from subsidiaries and affiliates of the named entities from all MAS contracts.

Recommendations

We recommend that the FAS Commissioner:

1. Strengthen FAS's Robomod process to ensure that it identifies MAS contracts with prohibited telecom items;
2. Establish and enforce procedures and internal controls to:
 - (a) Ensure that contract modifications are issued promptly when FAS identifies prohibited telecom items on MAS contracts, and

- (b) Ensure that contractors promptly remove prohibited telecom items from MAS contract price lists.
- 3. Implement more stringent consequences for contractors that repeatedly attempt to offer prohibited telecom items, including executing General Services Administration Acquisition Regulation clause 552.238-79, *Cancellation*.
- 4. Implement a process to instruct contractors that violate the FAR restrictions on the procurement of prohibited telecom items to notify and remit refunds to any customer agencies that purchased prohibited telecom items after the FAR was updated regarding named entities.
- 5. Identify items offered from subsidiaries and affiliates of named entities and either cancel the subject contract or remove the prohibited items from MAS contracts.

GSA Comments

The FAS Commissioner agreed with our recommendations and provided general comments on FAS's internal controls and efforts in this subject area. These comments did not affect our findings and conclusions. FAS's response is included in its entirety in **Appendix B**.

Audit Team

This audit was managed out of the Heartland Region Audit Office and conducted by the individuals listed below:

Michelle Westrup	Regional Inspector General for Auditing
David Garcia	Audit Manager
Shannon McKinzie	Auditor-In-Charge
Katina Luke	Management Analyst

Appendix A – Objective, Scope, and Methodology

Objective

We performed this audit to determine if FAS is complying with laws, regulations, and policies to ensure that MAS contracts do not offer prohibited telecom items.

Scope and Methodology

The scope of our audit included the data captured by FAS’s Robomod process from its inception in November 2018 through February 2022.

To accomplish our objective, we:

- Reviewed federal regulations, policies, and guidance related to named entities and telecom items;
- Reviewed prior audit reports and corrective actions that are significant to the audit objective;
- Analyzed Robomod data related to prohibited and solely compatible telecom items for the time period of November 2018 through February 2022;
- Compared Robomod data to GSA Advantage! to determine if FAS suppressed prohibited telecom items from GSA Advantage!;
- Judgmentally sampled 34 MAS contracts with total sales of \$211 million between October 2018 and February 2022 to determine if prohibited telecom items were removed from MAS contracts;
- Reviewed contract documents and contract price lists from the GSA’s Electronic Contract Management System for each of the 34 sampled contracts;
- Reviewed SAM self-certifications for the 23 contractors FAS identified with prohibited telecom items through the Robomod process;
- Reviewed IOA assessments of the 26 contractors that FAS identified as those that repeatedly offered prohibited telecom items; and
- Interviewed GSA officials and FAS contracting staff.

Data Reliability

We assessed the reliability of a list of items FAS provided us that reflects the results of its Robomod process. This list contained the items on GSA Advantage! that FAS determined were prohibited telecom items and suppressed from view (Suppression List). The Suppression List we reviewed contains items starting from the first Robomod in November 2018 through February 2022. To validate this data, we compared the Suppression List to GSA Advantage! to verify that the prohibited items were no longer offered. We also compared the Suppression List to relevant Electronic Contract Management System documents to ensure the data and dates

used in the Suppression List were accurate. We determined that the data was sufficiently reliable for the purposes of this audit.

Sampling

An FAS OPC Acquisition Policy Division official provided a cumulative list of all the items FAS reviewed during its Robomod process for compliance with the 2018 and 2019 NDAA's. This Robomod listing contained a total of 131 MAS contracts, 23 of which offered prohibited telecom items on GSA Advantage!. We included all 23 of these contracts in our sample. In addition, we judgmentally selected 11 additional MAS contracts, which are described below.

- We judgmentally selected three MAS contracts from contractors FAS identified as subsidiaries or affiliates of the named entities listed in the 2019 NDAA. FAS provided us with a list of affiliates and subsidiaries related to the named entities.
- We selected three MAS contracts that sold items from a company identified in an online news source as providing foreign surveillance equipment to federal government agencies. This company is a subsidiary of Dahua Technology Company, one of the named entities identified in the 2019 NDAA. We included all three of the contracts referenced in the article.
- We selected five MAS contracts that we identified as offering prohibited telecom items based upon our GSA Advantage! search for any reference to the named entities identified in the 2019 NDAA. We identified items that appeared to be prohibited and included all five contracts in our sample for further review.

In total, we sampled 34 contracts. These 34 contracts contained 32 prohibited telecom items. Total sales under the 34 sampled MAS contracts of telecom categories from October 2018 through February 2022 totaled \$211,150,984. This represents approximately 3 percent of total MAS Program sales of telecom categories (approximately \$7 billion) during that same period. While our judgmental samples do not allow for projection to the population, they did allow us to adequately address our audit objective.

Internal Controls

We assessed internal controls significant within the context of our audit objective against GAO-14-704G, *Standards for Internal Control in the Federal Government*. The methodology above describes the scope of our assessment and the report findings include any internal control deficiencies we identified. Our assessment is not intended to provide assurance on GSA's internal control structure as a whole. GSA management is responsible for establishing and maintaining internal controls.

Compliance Statement

We conducted the audit between October 2021 and September 2022 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our finding and conclusions based on our audit objective.

Appendix B – GSA Comments

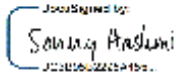
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Federal Acquisition Service

June 6, 2023

MEMORANDUM FOR: Michelle Westrup
Regional Inspector General for Auditing
GSA, Office of Inspector General

FROM: Sonny Hashmi 
Commissioner
Federal Acquisition Service
U.S. General Services Administration

SUBJECT: Multiple Award Schedule Contracts Offered Prohibited Items,
Putting Customers at Risk of Unauthorized Surveillance by
Foreign Adversaries (A220016)

Thank you for the opportunity to comment on the referenced draft audit report, "Multiple Award Schedule Contracts Offered Prohibited Items, Putting Customers at Risk of Unauthorized Surveillance by Foreign Adversaries" A220016, DRAFT dated May 15th, 2023. The General Services Administration (GSA) fully concurs with the report's recommendations and respectfully summarizes its response below:

- The Federal Acquisition Service's (FAS) mission is to ensure that acquisition vehicles are compliant and safe for customers.
- FAS has proactively resolved all of the issues identified in the report. All prohibited items have been removed from contracts, GSA Advantage! and FSS Contract Price Lists, and customers have been notified.
- The OIG report acknowledges that FAS should continue its efforts to identify and remove items from affiliates and subsidiaries of prohibited entities (see recommendation #5).
- FAS's internal controls for prohibited items exceed what is included in the OIG report (see Appendix A).
- FAS continues to aggressively mature its supply chain risk management (SCRM) capabilities and has established itself as a SCRM leader in the Federal Government.

U.S. General Services Administration
1800 F Street NW
Washington, DC 20405
www.gsa.gov

FAS Implementation of the Kaspersky and Section 889 Prohibitions

FAS's mission is to ensure that acquisition vehicles are compliant and safe for customers. We welcome any insight that helps keep non-compliant products off our contracts, GSA Advantage! and FSS Contract Price Lists. We are constantly looking for ways to improve our internal controls and have continued to make program improvements before, during, and following the OIG's review.

FAS implemented the Kaspersky and Section 889 prohibitions in accordance with Federal Acquisition Regulation (FAR) subparts 4.20 and 4.21. For Section 889, indefinite delivery vehicles (IDVs) awarded before August 13, 2020, were required to be modified to incorporate FAR clause 52.204-25 (AUG 2020) before future orders could be placed. FAS canceled 131 non-compliant IDV contracts and successfully modified all other IDV contracts.

The report states that FAS's reliance on Contractor self-certifications in SAM is inadequate. FAS's use of contractor representations is consistent with the FAR. All agencies rely on contractor representations unless they have a reason to question the representation. This was affirmed in a recent Government Accountability Office (GAO) protest decision, *Sierra 7, Inc.; V3Gate, LLC*, B-421109, et al., Jan. 4, 2023, 2023 CPD ¶ 55, in which GAO stated that "where an agency has no information prior to award that would lead to the conclusion that the vendor, or the product or service to be provided, fails to comply with the solicitation's eligibility requirements, the agency can reasonably rely upon a vendor's representation/certification of compliance." However, FAS agrees that self-certification should not be *solely* relied on and has implemented additional SCRM internal controls.

FAS SCRM Internal Controls

FAS continues to be proactive in the development and implementation of internal controls in addition to the required FAR provisions and clauses. Additionally, FAS continues to make process improvements and expand the scope of our control environment to address emerging threats. Existing internal controls FAS has implemented in addition to Contractor self-certifications are listed in Appendix A.

In addition to these existing internal controls, FAS is in the process of piloting the FAS Catalog Platform (FCP). The FCP will enhance FAS compliance controls in several ways. First, the new FCP will replace the current disjointed contract and GSA Advantage! catalog workflows with a single unified workflow. The FCP will gradually replace the legacy "two-step" process with a single integrated workflow, which will fully align the GSA Advantage! price list to the negotiated contract, ensuring that only

awarded contract items appear on GSA Advantage! within two business days. Second, the FCP will enhance GSA's pre-award compliance flagging capabilities. The FCP will replace the standalone 4P tool with an *in-line* Compliance & Pricing Report available to both suppliers prior to offer and modification submission as well as GSA acquisition workforce members.

The report states that the Robomod process is insufficient. FAS agrees that there are opportunities to improve the Robomod process, but asserts that the internal controls, when considered as a whole, have been effective and continue to improve. The report states that 12 potentially prohibited telecom items were offered on GSA Advantage!. FAS reviewed these items and determined that 3 were non-compliant (these items have been removed). While FAS strives to ensure there are no prohibited products on GSA Advantage!, it should be noted that GSA Advantage! lists over 64,000,000 total products. Given this context, the finding that 3 products were non-compliant suggests an effective internal control environment.

GSA Response to OIG Recommendations:

GSA agrees with the recommendations provided by the OIG in this report.

Recommendation 1 states that GSA should "[s]trengthen FAS's Robomod process to ensure that it identifies MAS contracts with prohibited telecom items."

GSA agrees with this recommendation and has already taken several actions to strengthen the Robomod process since the OIG began its fieldwork. As part of the Robomod process, FAS now:

- searches GSA Advantage! for known subsidiaries and affiliates of covered entities;
- automatically blocks catalogs from being uploaded to GSA Advantage! if it includes products manufactured by known subsidiaries and affiliates;
- searches GSA Advantage! for known "white labeled" items;
- conducts an interim review in between Robomod iterations in order to significantly reduce the time it takes to remove items; and
- leverages third-party SCRM tools to improve our capabilities to identify prohibited products for removal.

On page 9, the report states that "[u]pon further review of these items, the FAS branch chief told us that only 2 of the 10 items added back under new

part numbers still include prohibited software." FAS notes that 8 of the 10 items are not the same product with different part numbers - they are new products entirely. These products are compliant because they are new models that no longer include prohibited Kaspersky software¹.

Recommendation 2(a) states GSA should "[e]stablish and enforce procedures and internal controls to ensure that contract modifications are issued promptly when FAS identifies prohibited telecom items on MAS contacts."

GSA agrees with this recommendation. After the OIG conducted fieldwork for this audit, FAS implemented a new interim review between quarterly Robomod iterations which further reduces the time needed to remove items. Overall, the Robomod lead time has been reduced by approximately 75% since its inception. Note that the Robomod includes a manual review element.

Recommendation 2(b) states GSA should "[e]stablish and enforce procedures and internal controls to ensure that contractors promptly remove prohibited telecom items from MAS contract price lists."

GSA agrees with this recommendation. FAS has removed all prohibited products from the FSS Contract Price Lists referenced in the report. FAS has established a procedure as part of the Robomod process to search FSS Contract Price Lists for non-compliant products and, if the non-compliant products are included, coordinate with the Contractor to remove the products from the Price List. FAS implemented this action in the most recent Robomod that concluded in April 2023.

FAS notes that the FSS Contract Price List should not be conflated with the MAS contract. The Contractor should only list awarded items on its FSS Contract Price List.

Recommendation 3 states that GSA should "[i]mplement more stringent consequences for contractors that repeatedly attempt to offer prohibited telecom items, including executing the General Services Administration Acquisition Regulation clause 552.238-79, *Cancellation*."

GSA agrees with this recommendation. FAS has implemented a process whereby Contracting Officers are notified if a Contractor has offered non-compliant products more than once. The Contracting Officer will require Contractors to provide a

¹ The following items are compliant: ICAS1YUSG110C, ICAS1YUSG1900C, ICAS1YUSG210C, ICAS2YUSG310C, ICAS1YUSG40C, ICCF1YUSG40C, ICID1YUSG40, USG40WNB, ICAS1YUSG80C, ICCF1YUSG80C, ICID1YUSG80, and USG80WNB.

Corrective Action Plan (CAP) or, if a CAP is already in place or other compliance issues exist, consider canceling the contract in whole or in part citing clause 552.238-79, *Cancellation*. As of May 2023, FAS has notified the Contracting Officer for every contract that has offered non-compliant products more than once. Furthermore, for certain Contractors that have repeatedly offered prohibited telecom items, FAS has recommended the Contracting Officer cancel the contract or consider other appropriate contract action.

Recommendation 4 states that GSA should "[i]mplement a process to instruct contractors that violate the FAR restrictions on the procurement of prohibited telecom items to notify and remit refunds to any customer agencies that purchased prohibited telecom items after the FAR was updated regarding named entities."

GSA agrees with this recommendation. FAS has implemented a process to notify customers if GSA Advantage! or the Transactional Data Reporting (TDR) dataset indicates that new prohibited products were recently sold. Furthermore, when FAS issues modifications to remove prohibited products from Schedule contracts, FAS reminds Contractors that they are responsible for reporting the sale of prohibited products to the agency's Contracting Officer per FAR clauses 52.204-23 (Kaspersky) and 52.204-25 (Section 889). After receiving a report from a Contractor, agencies may seek remittance of funds or pursue other solutions. Agencies with a concern about non-compliant products may contact the GSA National Customer Service Center which will bring the alleged violation to the attention of the appropriate GSA Contracting Officer to assist.

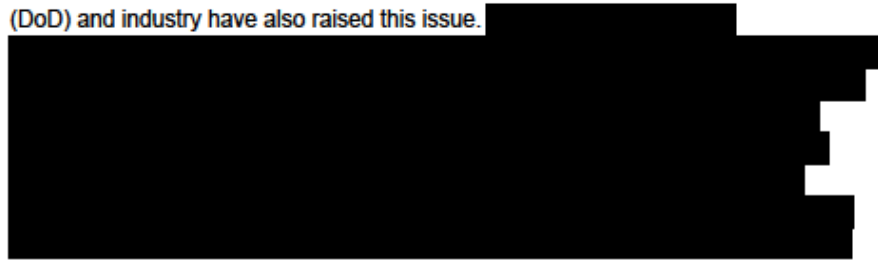
FAS reviewed the historical GSA Advantage! sales and TDR datasets to determine if non-compliant products were sold after the Kaspersky and Section 889 effective dates. Based on available data, FAS concludes that it has notified every customer that has purchased non-compliant products through the MAS program.

Recommendation 5 states that GSA should "[i]dentify items offered from subsidiaries and affiliates of named entities and either cancel the subject contract or remove the prohibited items from MAS contracts."

GSA agrees with this recommendation. FAS uses multiple commercial supply chain illumination tools to create a list of subsidiaries and affiliates of prohibited entities. These tools leverage machine learning and multiple language translation capabilities. GSA has used these tools to identify and remove approximately 1,600 products from Schedule contracts and GSA Advantage!, cancel two MAS contracts and share significant supply chain information with the Federal Acquisition Security Council

(FASC). In the report, the OIG acknowledges that FAS is addressing affiliates and subsidiaries (page 13 states "FAS should continue to identify and remove from all MAS contracts any prohibited telecom items from subsidiaries and affiliates of the named entities.").

As early as 2019, FAS recognized that it would be challenging to identify subsidiaries and affiliates of covered entities because of the complex and shifting nature of the business relationships, the lack of transparency, and the large number of companies that require tracking. FAS advocated to the FASC that a centralized body develop a public "list" that Federal agencies and industry could use. The Department of Defense (DoD) and industry have also raised this issue.



Conclusion

FAS strives to create a thriving, innovative, compliant and equitable marketplace. FAS has proactively resolved all of the issues identified in the report and has aggressively implemented additional internal controls to ensure our acquisition vehicles are safe for customers. As a result, FAS has established itself as a SCRM leader in the Federal Government. FAS has successfully:

- canceled a contract that offered "white labeled" prohibited telecommunication and video equipment; FAS referred the Contractor offering "white labeled" equipment to the GSA OIG and notified the FASC;
- Removed items from a MAS contract because the manufacturer was determined to pose a risk of foreign ownership, control or influence risk;
- engaged with FAS contractors that support critical programs if their "cybersecurity health" is determined to need improvement;
- proactively incorporated the FCC's Covered List into our risk management plans last year; and
- shared more substantial supply chain risk information than any other FASC member.

⁷ GSA requested to withhold this portion of its response from public release because it contains information from a restricted GAO report that dealt with classified or controlled unclassified information.

APPENDIX A

Internal Control	Description
Prohibited Products Robomod	Streamlines the removal of Kaspersky and Section 889 non-compliant products from Schedule contracts and GSA Advantage!. Cumulatively, the Robomod has removed approximately 1,772 non-compliant products from 54 contracts. The Robomod removed an additional 15,560 products that are compliant but exceed FAS's risk threshold.
Automated Suppression	Automatically hides non-compliant products on GSA Advantage! from customer view so they cannot be purchased. Cumulatively, FAS has suppressed over 21,000 products.
Automated Catalog Blocking	Automatically blocks product catalogs from being uploaded to GSA Advantage! if a prohibited entity is listed as the manufacturer for an offered product. FAS has blocked over 3,824 products.
Verified Products Portal (VPP) and Price Point Plus Portal (4P)	The VPP is a manufacturer, wholesaler, and digital content provider-facing portal for authoritative product content and supplier authorization information. Product data captured from the VPP is integrated into the 4P tool with business rules established to flag prohibited products. The VPP includes over 13.5 million products from over 16 thousand manufacturers. The VPP now uses over 430 product prohibition rules including more than 200 targeted as Section 889 covered entities (including known affiliates and subsidiaries), Kaspersky and other prohibited entities. Since May 2021, 4P has flagged 377,000 products across 320 jobs for potential SCRM violations.
On-Demand Contract Assessments	Industrial Operations Analysts (IOAs) schedule an On-Demand Contract Assessment and meet with high risk contractors. The goal of the Assessment is to ensure prohibited products, and products that are solely compatible with prohibited products, are removed from the catalog and the contractor is educated about the Section 889 and Kaspersky prohibitions.
Pre-award Vendor Risk Assessments	An enhanced review process for certain offers that include IT hardware. GSA analysts perform a pre-award vendor risk assessment using 3rd party Supply Chain Risk Management (SCRM) tools.
Prohibited Product Screening	On March 8, 2023, the FAS Office of Policy and Compliance issued a policy that requires COs to use 4P reports to screen for prohibited products whenever evaluating Multiple Award Schedule (MAS) products.
GSA SCRM Review Board	FAS COs are required to submit a report to the GSA SCRM Review Board if a vendor provides an affirmative representation to the Section 889 provision or the CO receives a report under clause 52.204-23 or 52.204-25. The GSA SCRM Review Board, which consists of acquisition, legal and IT subject matter experts from across GSA, reviews the report and provides recommendations on next steps to the CO. Since its inception, the SCRM Review Board has resolved 35 FAS cases.

Appendix C – Report Distribution

GSA Administrator (A)

GSA Deputy Administrator (AD)

FAS Commissioner (Q)

FAS Deputy Commissioner (Q1)

FAS Deputy Commissioner TTS (Q2)

Chief of Staff (Q0A)

Assistant Commissioner for the Office of Policy and Compliance (QV)

Chief Financial Officer (B)

Deputy Chief Financial Officer (B)

Office of Audit Management and Accountability (BA)

Assistant Inspector General for Auditing (JA)

Deputy Assistant Inspector General for Acquisition Program Audits (JA)

Deputy Assistant Inspector General for Real Property Audits (JA)

Director, Audit Planning, Policy, and Operations Staff (JAO)