



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

# Audit of Transactional Data Reporting Pilot Evaluation Plan and Metrics

Report Number A140143/Q/T/P18004  
July 25, 2018

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## ***Executive Summary***

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### **Audit of Transactional Data Reporting Pilot Evaluation Plan and Metrics**

Report Number A140143/Q/T/P18004

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#### **Why We Performed This Audit**

We have monitored GSA's Transactional Data Reporting (TDR) efforts since 2014 and included the implementation of TDR in our annual *Assessment of GSA's Major Management Challenges* since Fiscal Year 2015. Based upon our assessment of risks surrounding TDR, we included this audit in our *Fiscal Year 2017 Audit Plan*. We performed this audit to determine if GSA's TDR Pilot Evaluation Plan and Metrics will enable GSA to objectively measure and evaluate whether the TDR pilot is improving the value of the Multiple Award Schedules Program for GSA's customer agencies and the American taxpayer.

#### **What We Found**

We determined that the TDR Pilot Evaluation Plan and Metrics will not enable GSA to objectively measure or evaluate whether the TDR pilot is improving the value of the Multiple Award Schedules Program. Specifically, we found that the TDR pilot objectives are not well-defined, some metrics lack performance targets, and a majority of the metrics rely on data that is not available for use in or evaluation of the pilot.

#### **What We Recommend**

We recommend that the Federal Acquisition Service Commissioner and GSA's Senior Procurement Executive:

1. Revise the TDR pilot objectives to include specific statements of accomplishment to measure performance.
2. Establish performance targets for each pilot metric.
3. Ensure that TDR data is available, accurate, and reliable for use in and evaluation of the pilot.

The Commissioner of the Federal Acquisition Service and the Associate Administrator for the Office of Government-wide Policy partially agreed with our recommendations. GSA's written comments are included in their entirety as ***Appendix B***.

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## Introduction

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We performed an audit of GSA’s Transactional Data Reporting (TDR) Pilot Evaluation Plan and Metrics.

### Purpose

TDR represents the most significant change to GSA’s Multiple Award Schedules Program (Schedules Program) in over 20 years. Accordingly, we have monitored GSA’s efforts in this area since 2014 and included the implementation of TDR in our annual *Assessment of GSA’s Major Management Challenges* since Fiscal Year 2015. Based upon our assessment of risks surrounding TDR, we included this audit in our *Fiscal Year 2017 Audit Plan*.

### Objective

Our objective was to determine if GSA’s TDR Pilot Evaluation Plan and Metrics will enable GSA to objectively measure and evaluate whether the TDR pilot is improving the value of the Schedules Program for GSA’s customer agencies and the American taxpayer.

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

### Background

On June 23, 2016, GSA published a final rule in the Federal Register establishing TDR for orders placed against GSA contracts, including those in the Schedules Program.<sup>1</sup> Under the rule, contractors are required to report transactional data, including prices paid by government customers, for products and services sold under their respective GSA contracts. GSA implemented TDR as a catalyst to move towards category management – a major federal initiative intended to enable government agencies to manage purchases more like a single enterprise, as opposed to individually. According to GSA, TDR will enable the government to analyze what it buys and how much it pays, thereby allowing government procurement officials to identify the most efficient solutions and sources to meet their agencies’ needs.

In the final rule, GSA asserted that TDR would be introduced to the Schedules Program on a pilot basis applied to select schedules. In August 2016, GSA’s Federal Acquisition Service (FAS) launched a 3-year pilot using a phased implementation over 6 months. The eight schedules included in the TDR pilot account for more than 40 percent of Schedules Program sales and are listed below.

- Schedule 58 I – Professional Audio and Video
- Schedule 72 – Furnishing and Floor Coverings

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<sup>1</sup> Code of Federal Regulations, Title 48, Sections 501, 515, 516, 538, and 552 (2016).

- Schedule 51 V – Hardware Superstore
- Schedule 03FAC – Facilities Management and Maintenance
- Schedule 75 – Office Products and Supplies
- Schedule 73 – Food Service, Hospitality, Cleaning Equipment and Supplies, Chemicals and Services
- Schedule 70 – Information Technology (select offerings)
- Schedule 00CORP – Professional Services Schedule (select offerings)

According to FAS, the purpose of the TDR pilot is to improve the value of the Schedules Program for GSA's customer agencies and the American taxpayer. As outlined in the final rule, GSA will evaluate the pilot against a series of metrics that include changes in price, sales volume, small business participation, and smarter buying strategies.

The TDR pilot evaluation is being conducted within GSA by FAS and the Office of Government-wide Policy (OGP), in consultation with the Office of Management and Budget. Ultimately, GSA's Senior Procurement Executive within OGP will determine whether to expand, limit, or discontinue TDR. The final rule states that expansion of the TDR pilot or action to make TDR permanent for schedule contracts will not occur without at least 1 year of experience under the pilot (that is, not before August 2017). As of the date of this report, no further expansion or action to make TDR permanent has occurred.

In March 2017 – 7 months after the TDR pilot began – GSA developed the TDR Pilot Evaluation Plan and Metrics (TDR Evaluation Plan). Although the TDR Evaluation Plan includes the pilot evaluation metrics, it states that the timelines and metrics may be amended as the pilot proceeds. There are primary and secondary metrics included in the TDR Evaluation Plan. The TDR pilot's secondary metrics will be given less weight in the evaluation than the primary metrics because the primary metrics are outcome-oriented and are intended to measure the final rule's stated goals. As a result, our audit focused on the primary metrics which are outlined in *Figure 1* on the following page.

**Figure 1 – TDR Pilot Primary Metrics**

<b>Metric</b>	<b>Definition</b>
<b>Category Manager Usage</b>	This metric will be used to evaluate the use of transactional data by category managers to establish smarter buying strategies.
<b>Changes in Contract-Level Pricing</b>	This metric will be used to evaluate changes in awarded prices on schedule contracts during the TDR pilot.
<b>Changes in Order-Level Pricing</b>	This metric will be used to evaluate changes in the prices paid on task orders under schedule contracts during the TDR pilot.
<b>Federal Supply Schedule Utilization Rate</b>	This metric will be used to evaluate the effect of the pilot on the overall Schedules Program usage compared to other contracting vehicles.
<b>Oversight Effectiveness</b>	This metric will be used to evaluate the effect of the pilot on GSA’s ability to monitor contractor compliance under the Schedules Program, such as price overcharges.
<b>Paperwork Reduction Act Burden</b>	This metric will be used to evaluate the reporting burden in accordance with the Paperwork Reduction Act.
<b>Small Business Utilization Rate</b>	This metric will be used to evaluate the effect of the TDR pilot on small business use within the Schedules Program.
<b>Stakeholder Data Access</b>	This metric will be used to evaluate FAS’s progress towards providing transactional data collected through the TDR pilot to key stakeholders (for example, FAS contracting officers, general public).

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## Results

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As currently written, the TDR Evaluation Plan will not enable GSA to objectively measure and evaluate whether the TDR pilot is improving the value of the Schedules Program for GSA's customer agencies and the American taxpayer. Specifically, we determined that the TDR pilot objectives are poorly defined, impairing GSA's ability to make determinations on the TDR pilot's effectiveness. Further, we found that the established metrics limit GSA's ability to measure the TDR pilot's results because they lack performance targets and are designed to use TDR data that GSA has not made available for use in or evaluation of the pilot. Until improvements are made to address these deficiencies, GSA cannot make well-informed decisions on the effectiveness of the TDR pilot.

**Finding 1 – GSA's ability to objectively measure and evaluate the TDR pilot's results is limited because the TDR pilot objectives are not well-defined.**

The TDR pilot objectives – changes in price, sales volume, small business participation, and macro use of transactional data by category managers to create smarter buying strategies – are overly broad and do not indicate how success will be defined or quantified. Absent a well-defined objective that demonstrates what will be assessed, how it will be measured, and what is to be achieved, GSA's ability to accurately evaluate the TDR pilot is limited.

In 2016, the U.S. Government Accountability Office (GAO) reported that a successful pilot objective should be well-defined, appropriate, clear, and measurable.<sup>2</sup> Specifically, GAO noted that a pilot objective should have specific statements of accomplishments to meet objectives, be clear and measurable, and be translated into specific, researchable questions of what will be assessed. According to GAO, this will help to ensure that appropriate data is collected from the outset of a pilot in order to be measured and accurately assessed as well as clearly document the goals of a pilot and how they are to be achieved.

GSA launched the TDR pilot in August 2016; however, it did not establish the TDR Evaluation Plan to evaluate the pilot until March 2017. GSA officials told us that they did not see challenges with starting the TDR pilot without the TDR Evaluation Plan in place. GSA began the TDR pilot using a general framework from the final rule for the pilot's objectives. GSA's reliance on the general objectives from the final rule, which are not specific or well-defined, makes the TDR pilot's evaluation difficult because there is no clear measurement of success. Instead, GSA should have further refined the TDR pilot objectives, and clearly identified them as such, in the TDR Evaluation Plan prior to the TDR pilot's implementation.

Without specific objectives, including rationale on how to measure performance, GSA will not be able to objectively measure and evaluate progress to determine whether to expand, limit, or

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<sup>2</sup> *Data Act: Section 5 Pilot Design Issues Need to Be Addressed to Meet Goal of Reducing Recipient Reporting Burden* (Report Number GAO-16-438, April 19, 2016).

discontinue the TDR pilot. Therefore, FAS should modify the TDR pilot objectives to include definitive, assessable statements of accomplishment to measure performance.

**Finding 2 – GSA cannot objectively measure and evaluate the TDR pilot’s results due to undefined performance targets and unavailable TDR data.**

The TDR pilot metrics lack performance targets necessary to measure results and evaluate performance. In addition, GSA cannot determine whether the TDR data is complete, accurate, and reliable, due to its unavailability. Similarly, GSA cannot use it to affect pricing or other terms and conditions, or rely upon it to measure the majority of the TDR metrics. Without clearly defined performance targets and TDR data to evaluate the metrics, GSA cannot objectively measure and evaluate the TDR pilot’s results and make informed decisions on whether it should be expanded, limited, or discontinued.

**Metrics Lack Performance Targets**

We analyzed the primary TDR pilot metrics to determine if a performance target was established for purposes of comparison or measurement. Of the eight TDR pilot metrics, we found that the following seven did not have defined performance targets to measure results:

- Category Manager Usage
- Changes in Contract-Level Pricing
- Changes in Order-Level Pricing
- Oversight Effectiveness
- Paperwork Reduction Act Burden
- Small Business Utilization Rate
- Stakeholder Data Access

We asked GSA officials if a certain percentage change for some of the metrics would be deemed a “success.” GSA officials stated that they would consider directional trends and tradeoffs between the metrics when evaluating the TDR pilot results. As an example, they said a large decrease in price accompanied by a large increase in contractors leaving the Schedules Program may not be beneficial. The TDR Evaluation Plan states that no one metric will solely determine whether the TDR pilot is achieving its goal. Rather, GSA will make a holistic assessment before making a decision on the future of the TDR pilot.

In our opinion, without clear performance targets, GSA cannot objectively measure and evaluate the success of the TDR pilot. For example, the Oversight Effectiveness metric will be used to assess contractor compliance with contract terms and conditions. GSA plans to measure the percentage of items on pilot contracts that are sold at a higher price than the schedule contract price (overcharges). However, this measure does not establish whether the percentage of identified overcharges should increase or decrease, thereby providing GSA with the ability to interpret success in multiple ways. For instance, if the percentage of items with overcharges increases, GSA officials could conclude that the TDR data resulted in improvements



to oversight of contractor compliance because more overcharges were identified than previous years. Alternatively, if the percentage decreases, GSA officials could conclude that the collection and use of TDR data was an effective oversight tool to ensure contractor compliance (i.e., contractors are overcharging the government less often). Another example is the Category Manager Usage metric. According to the TDR Evaluation Plan, this metric will ultimately be measured by the savings resulting from smarter buying strategies using TDR data. However, there is no specific quantitative performance target to effectively evaluate this metric.

The Government Performance and Results Modernization Act of 2010 establishes a framework for setting goals, measuring results, and reporting their progress.<sup>3</sup> This Act outlines the importance of having a target level of performance against which achievement can be compared. The absence of performance targets will impair GSA's ability to objectively evaluate the TDR pilot and make decisions regarding the future of TDR.

### TDR Data is Not Available

GSA began collecting TDR data from participating contractors in October 2016. As of August 2017, the Agency had amassed over 500 million line items of TDR data. Six of the eight metrics in the TDR Evaluation Plan, including pricing metrics, are designed to use this data to assess the TDR pilot. However, the data is currently not available for use in or evaluation of the pilot. At this time, TDR data is restricted until GSA develops a plan to fully protect the data. The data is only available to a FAS data analytics team and select category managers, neither of which are charged with evaluating the TDR pilot. The limited availability of the TDR data presents two problems for GSA's pilot evaluation.

First, FAS officials are unable to verify or validate the data to determine whether it is complete, accurate, and reliable. The TDR data is submitted directly by schedule contractors into GSA's Sales Reporting Portal, which limits GSA's control over its accuracy and reliability. The verification and validation of this data is critical to ensure the data can be relied upon for use in making informed decisions on the future of TDR.

Second, the TDR data is unavailable for use by key stakeholders. For example, GSA and ordering agency contracting officers do not have access to the transactional data and cannot use it for price analysis. Therefore, the metrics designed to evaluate changes in pricing at the contract and order level cannot be assessed. GSA acknowledges the limited availability of TDR data in its TDR Evaluation Plan, which states that some metrics will not be evaluated until at least Fiscal Year 2018. However, GSA could make decisions regarding the future of the TDR pilot at any time.

The Government Performance and Results Modernization Act of 2010 emphasizes the need for verification and validation of performance data. Therefore, once the TDR data is accessible, FAS

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<sup>3</sup> Government Performance and Results Modernization Act of 2010, Pub L. 111-352, 124 Stat. 3866-3884 (January 4, 2011).

should take steps to ensure that the data is complete, accurate, and reliable. FAS should also ensure that the TDR data is available for use by appropriate stakeholders, such as GSA and ordering agency contracting officers, so that GSA can begin to use the metrics to measure the effect of the TDR data on federal acquisitions.

While the TDR pilot metrics consider and seek to evaluate many key factors, the absence of performance targets and the limited availability of TDR data restrict GSA's ability to use the metrics to evaluate the TDR pilot. GSA should revise the metrics to include performance targets and ensure that the TDR data is available for use in and evaluation of the pilot.

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## Conclusion

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The TDR Evaluation Plan will not enable GSA to objectively measure and evaluate whether the TDR pilot is improving the value of the Schedules Program for GSA's customer agencies and the American taxpayer. Specifically, the TDR pilot objectives are not well-defined, some of the established metrics lack performance targets, and a majority of the metrics rely on data that is not available for use or evaluation. As a result, GSA is not positioned to use the metrics to assess the TDR pilot.

FAS and OGP should revise the TDR pilot plan objectives, establish performance targets for each metric, and ensure availability, accuracy, and reliability of TDR data.

## Recommendations

We recommend that the FAS Commissioner and GSA's Senior Procurement Executive:

1. Revise the TDR pilot objectives to include specific statements of accomplishment to measure performance.
2. Establish performance targets for each pilot metric.
3. Ensure that TDR data is available, accurate, and reliable for use in and evaluation of the pilot.

## GSA Comments

The FAS Commissioner and the OGP Associate Administrator partially agreed with our recommendations. GSA's written comments are included in their entirety as **Appendix B**.

## Audit Team

This audit was managed out of the Acquisition and Information Technology Audit Office and conducted by the individuals listed below:

Sonya D. Panzo	Associate Deputy Assistant Inspector General for Auditing
Michelle L. Westrup	Audit Manager
Susan E. Myers	Auditor-In-Charge
Jessica E. Joy	Management Analyst
Marcie A. Mclsaac	Auditor

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## ***Appendix A – Scope and Methodology***

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Our audit evaluated GSA’s TDR Evaluation Plan.

To accomplish our objective, we:

- Reviewed relevant background documentation regarding TDR, including Federal Register, Vol.81, No.121, June 23, 2016;
- Reviewed and analyzed the TDR Evaluation Plan;
- Analyzed the TDR pilot’s design using GAO’s report, *Data Act: Section 5 Pilot Design Issues Need to Be Addressed to Meet Goal of Reducing Recipient Reporting Burden*, which outlines leading practices for creating an effective pilot design;
- Analyzed the TDR pilot’s primary metrics using the Government Performance and Results Modernization Act of 2010, which establishes a framework for setting goals, measuring results, and reporting their progress; and
- Held discussions with FAS and OGP officials regarding the TDR Evaluation Plan.

We conducted the audit between November 2016 and October 2017 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 findings and conclusions based on our audit objective.

### **Internal Controls**

Our assessment of internal controls was limited to those necessary to address the objective of the audit.

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## Appendix B – GSA Comments

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GSA Federal Acquisition Service

June 22, 2018

MEMORANDUM FOR: Sonya D. Panzo  
Associate Deputy Assistant Inspector General for Auditing  
Acquisition and Information Technology Audit Office (JA-T)  
Office of Inspector General

FROM: Alan B. Thomas, Jr. *ABT* 22 Jun 18  
Commissioner  
Federal Acquisition Service (Q)

Jessica H. Salmoiraghi *JH Salmoiraghi* 22 June 18  
Associate Administrator  
Office of Government-wide Policy (M)

SUBJECT: Audit of Transactional Data Reporting Pilot Evaluation Plan  
and Metrics Report Number A140143-2

Thank you for the opportunity to comment on the referenced draft report *Audit of Transactional Data Reporting Pilot Evaluation Plan and Metrics, Report Number A140143-2* dated June 1, 2018. The Federal Acquisition Service (FAS), in conjunction with the Office of Government-wide Policy (OGP), appreciates the audit recommendations and has provided our response below.

### OIG Recommendation 1

***Revise the TDR pilot objectives to include specific statements of accomplishment to measure performance.***

While we agree that specific statements of accomplishment to measure performance are desirable for an established program, we feel the current objectives are appropriate given the nascent state of the pilot. The current pilot objectives reflect GSA's efforts to modernize its pricing practices, gain insight into Schedule spend, and reduce burden. However, the evaluation

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plan, including the objectives and metrics, are not static and may evolve as the Transactional Data Reporting (TDR) pilot matures.

For decades, GSA used the Price Reductions Clause (PRC) and the Commercial Sales Practice (CSP) form (or its predecessors) as key means of establishing price reasonableness for contracts under the Federal Supply Schedules (FSS) program. When these procedures were created, the Schedules program primarily consisted of contracts with Original Equipment Manufacturers (OEMs) for the purchase of commercial products. Over the years, the Schedules program evolved. Today, two-thirds of the dollars are for services, thousands of resellers have joined the program, and numerous OEMs left the program.<sup>1</sup> Some of whom have cited the burdensome CSP and PRC requirements in their decision to leave the program.

With the TDR rule, GSA was looking to obtain a necessary level of insight and understanding into agency spend. This understanding of spend was long requested by the Office of Management and Budget (OMB), by key stakeholders, and by other federal agencies. It was a critical element in order for the Schedules program to qualify as a "spend under management" approved contract vehicle. At the same time, GSA was looking to reduce total burden on industry as part of its efforts to improve the pricing model.

In meeting these goals, GSA set forth objectives that the audit summarized as being around changes in price, sales volume, small business participation, and macro use of transactional data by category managers to create smarter buying strategies.

The draft audit report states these objectives are overly broad and do not indicate how success will be defined or quantified. The draft report continues that absent a well defined objective, GSA's ability to accurately evaluate whether the pilot is improving the value of the Schedules program is limited.

The TDR evaluation plan set out how the metrics will be measured<sup>2</sup> and included statements of accomplishment to measure their performance. The descriptions of the primary metrics include definitions, metric types, measures, comparison groups, timeframes, and influencing factors.

The outcome statements for each of the four objectives/metrics the OIG Draft Report calls out are as follows:

- Changes in contract-level pricing
  - *Outcome:* Percentage (%) of total items priced within a defined target range
  - *Outcome:* Percentage (%) change in defined market basket contract-level prices
  - *Outcome:* Percentage (%) change in defined market basket contract-level prices relative to available commercial item benchmarks

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<sup>1</sup> An Original Equipment Manufacturers (OEM) is the producer of parts and products, as opposed to a reseller, who sells parts and products produced by an OEM.

<sup>2</sup> See *TDR Pilot Evaluation Plan and Metrics*, pg. 15-24.

- Changes in order-level pricing
  - *Outcome:* Percentage (%) change in defined market basket order-level prices
  - *Outcome:* Percentage (%) change in defined market basket order-level prices relative to available commercial item benchmarks
- Sales volume
  - *Outcome:* Percentage (%) of the addressable market spend compared to the same time the previous fiscal year
- Small business participation
  - *Outcome:* Percentage (%) change in the number small businesses receiving order awards.
  - *Outcome:* Overall GSA Federal Strategic Sourcing (FSS) spend captured by small businesses.
- Category manager usage
  - *Outcome:* Savings resulting from smarter buying strategies implemented using TDR pilot data

To determine whether or not the pilot is improving the value of the Schedules program, the Senior Procurement Executive (SPE) and FAS Commissioner are evaluating whether or not the migration from the CSP and PRC negatively impact pricing, sales volume, or small business participation. In addition, they need to assess whether GSA is obtaining and beginning to use the data to make better decisions, which would improve the value of the Schedules program for GSA's customer agencies and the American taxpayer.

If the pilot answer meets or improves upon current performance in terms of pricing, small business participation, and business volume, while category managers begin to make use of the data to make better decisions, then the pilot will be considered a positive step towards meeting GSA and OMB requirements. Once baselines and targets are set, then the SPE and FAS Commissioner will be better able to assess how far we have moved in the right direction, and where improvements are needed.

#### **OIG Recommendation 2**

##### ***Establish performance targets for each pilot metric.***

We appreciate the GSA OIG's perspective and partially agree with this recommendation. While GSA agrees that a performance target should ultimately be set for each metric, it is necessary to first establish a baseline. Once the baseline is established, then the target can be set.

The TDR Pilot Evaluation Plan takes into consideration the time necessary to establish baselines for each metric. The fiscal year in which each metric will have results - in that a quantitative baseline has been established and GSA is working to improve upon that baseline - has been pulled directly from the Evaluation Plan and is listed in the chart below.

Metric	Results
Category Manager Usage	FY19 <sup>3</sup>
Changes in Contract-Level Pricing	FY18 <sup>4</sup>
Changes in Order-Level Pricing	FY18
GSA Federal Supply Schedule Utilization Rate	FY17
Oversight Effectiveness	FY18
Paperwork Reduction Act (PRA) Burden	FY19
Small Business Utilization Rate	FY18 <sup>5</sup>
Stakeholder Data Access	FY19 <sup>6</sup>

The Evaluation Plan anticipates baselines being developed for the majority of the primary metrics through FY17 and some into FY18. In the absence of baselines, GSA established directional targets for each pilot metric which can be summarized as (1) meet or improve upon current performance and (2) better leverage the Government's buying power through the reduction of contract duplication.

While we agree that there is a need to set performance targets once baselines can be established, the Evaluation Plan outlines a path of progress towards that goal. Accordingly, the plan is intended to be a living document that will be updated when baselines can be determined.

**OIG Recommendation 3**

*Ensure that TDR data is available, accurate, and reliable for use in and evaluation of the pilot.*

GSA agrees with this recommendation. Currently FAS and the Category Managers are identifying the accuracy, completeness, and reliability of the data being provided by our

<sup>3</sup> Savings resulting from smarter buying strategies implemented using TDR pilot data.

<sup>4</sup> GSA FSS contracting officers (COs) will not be able to leverage transactional data to influence GSA FSS pricing until they are given access to the transactional data, which is scheduled to happen before the end of FY 2017. Accordingly, Changes in Contract-Level Pricing will not be used as an evaluation metric until GSA FSS COs are using transactional data to negotiate contract-level prices. GSA anticipates using this metric in FY 2018.

<sup>5</sup> The impact of the TDR pilot on small business utilization may not become apparent until category managers, ordering activities, and GSA FSS COs begin to utilize the transactional data collected through the pilot.

<sup>6</sup> According to the Evaluation Plan, all stakeholders will have had one year of access to the data as of the end of FY18. Thus, FY19 will be the first year in which GSA can make progress against that baseline.



contractors. As this is a new data requirement for our contractors, FAS is implementing some additional training and change management to assist with data completeness and accuracy. FAS will further track the percentage of completeness and evaluation on the accuracy and reliability. After which we will begin to utilize the data for the evaluation of the pilot to ensure a responsible use of the data.

Again, thank you for the opportunity to review this draft report. If you have any questions, please contact Matthew McFarland from the OGP Office of Acquisition Policy at [matthew.mcfarland@gsa.gov](mailto:matthew.mcfarland@gsa.gov) or Stephanie Shutt, Director of the Multiple Award Schedules Program Management Office under FAS at [stephanie.shutt@gsa.gov](mailto:stephanie.shutt@gsa.gov).

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## ***Appendix C – Report Distribution***

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GSA Administrator (A)

Commissioner (Q)

Deputy Commissioner (Q1)

Deputy Commissioner (Q2)

Chief of Staff (Q0A)

Program Analysis Officer (Q1A)

Assistant Commissioner, Office of Policy and Compliance (QV)

Associate Administrator, Office of Government-wide Policy (M)

Deputy Associate Administrator, Office of Government-wide Policy (M1)

GSA Senior Procurement Executive (M1V)

Financial Management Officer, FAS Financial Services Division (BGF)

Chief Administrative Services Officer (H)

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Assistant Inspector General for Auditing (JA)

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