



PROFESSIONAL SERVICES SCHEDULE (PSS) MODIFICATION INSTRUCTIONS

Updated October 2015

Attention Industry Partner:

GSA values our relationships with our industry partners. We know how hard you work to manage your MAS contract and promote the MAS program. We also know that effective contract administration can be a challenge, and we want the experience of modifying your contract to be as effective as possible. To that end, we have developed detailed modification instructions, FAQs, and resources for you to be able to prepare a modification package that can be quickly processed and awarded.

The modification instructions are aligned with current solicitation proposal instructions (SCP-FSS-001, SCP-FSS-002, SCP-FSS-003 and SCP-FSS-004). If at any time during this process you have questions, please contact the Contract Specialist assigned to your contract. Email and phone number can be found via <http://www.gsaelibrary.gsa.gov>. (Enter your contract number. Click on your company name. Your GSA Government Contracting Specialist is on the right, across from your company POC.)

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(Note: Documents must be sent in hard copy for novations, rather than eMod)

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(Note: Applicable to Logistic services, SIN C874-597, 874-597 and SIN C100-02)

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Note: Applicable to price changes IAW clause 52.222-43, Fair Labor Standards Act and SCA Price Adjustment (Multiple Year and Option Contracts), due to incorporation of revised wage determinations. (Note - A firm who chooses to adjust pricing for service employees IAW SCA cannot also obtain a price increase based on an EPA adjustment used for any professional employees).

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General Instructions:

All MODs must be submitted in eMOD system at <http://eoffer.gsa.gov/>
Having trouble accessing eMod or submitting your request?

Unilateral Administrative Modifications
Step 1: Administrative Changes

Bilateral Modifications
Step 1: Contract Compliance (must be completed)
Step 2: Mandatory docs for all MOD requests (must be included)
Step 3: Select a MOD Type (follow instructions per MOD type request)

Note: (READ ME) If any mandatory information is missing or incomplete, your modification (MOD) request will be rejected by the reviewing Contracting Officer/Contract Specialist.

Unilateral Administrative Modifications
Step 1: Administrative and RAM modifications
<p style="text-align: center;">Administrative Changes</p> <p>Administrative changes are changes to the contract that don't change the substantive rights of the parties to the contract. See eMod Instructions at http://www.eoffer.gsa.gov/. The following list identifies the available types of Administrative Modifications:</p> <ul style="list-style-type: none">a) Contract Administrator/Point of Contact (POC) Changeb) Authorized Negotiator Change*c) Email Address Changed) Fax Changee) Telephone Number Changef) Website Address Changeg) Change of (add/delete) authorized dealerh) Delete Labor Category**i) Delete Product(s)**j) Delete SIN**k) Change of Geographic Scope (Domestic or Worldwide)l) Subcontracting Plan***m) Temporary/Permanent Price Reductions (see below)

Note 1: Address Changes: You must first change your address in the System for Award Management (SAM). Upon accessing the eMod system, the vendor will be notified of the address change via a pop-up message. The user will be required to confirm the new address and will be prompted to apply the new address to any other GSA schedule contracts that the company may hold. An automatic rapid action modification (RAM) will be sent to your Contracting Officer to incorporate the change into your contract. The generated modification will not affect the list of current Authorized Negotiators or Contact for Contract Administration.

*Note 2: If a firm is adding a third party as an authorized negotiator, also attach an agent authorization letter (found as a separate document in the latest solicitation refresh) signed by the contractor's authorized negotiator.

**Note 3: Firms deleting SINS and/or labor categories must provide the entire contract price list on the current PPL format found in the solicitation (excluding those labor categories/labor category descriptions/support products/courses).

***Note 4: The "subcontracting plan" sub type is only available if the contract requires a subcontracting plan. When selecting this option for a modification, fill out the template with identified goals, print out the document, sign it and then upload to eMod for the Contracting Officer's review.

Temporary/Permanent Price Reductions

The following items must be included for all Price Reduction Modification requests:

Detailed letter explaining the reason for the Price Reduction. This letter should also clearly state the awarded contract items affected by the Price Reduction.

Note 5: Price Reduction and Temporary Price Reductions are effective the day of modification submission.

Bilateral Modifications

Step 1: Contract Compliance (must be completed)

Step 1.1: Contract Compliance – GSA will only consider modification requests from contractors who are in compliance with the contract. The following items must be current, complete, and accurate before submitting your modification request.

- o GSA Advantage text file and catalog file
- o System for Award Management (SAM) registration
- o All mandatory mass modifications have been accepted
- o Contract compliance requirements are in accordance with (IAW) SCP-FSS-001 INSTRUCTIONS APPLICABLE

Contract Compliance Requirements: Prior to submitting a modification request, you need to ensure compliance with the latest schedule refresh.

Your GSA Schedule contract undergoes updates periodically which are captured in the Schedule solicitation refreshes. When a refresh occurs, the terms and conditions of the GSA schedule solicitation are updated, which in turn triggers a Mass Modification to every GSA schedule contract. Acceptance of Mass Modifications is a prerequisite for submitting a modification request. In many instances, a solicitation refresh occurs in conjunction with or as a result of system or document changes. For example, the version of the PPL that a contract is awarded under may become out of date and may need to be updated to the current version.

It is important to use the latest documents when submitting modification requests. The following terms and conditions must be updated in your contract if they have not already been changed:

- IAW SCP-FSS-002, SPECIFIC PROPOSAL INSTRUCTIONS FOR SERVICES (MAR 2014)(d)(3)(iv)(5) Service Contract Act: Escalation was clarified and all non professional labor categories (SCA covered) shall be escalated IAW 52.222-43 Fair Labor Standards Act and Service Contract Act Price Adjustment (Multiple Year and Option Contracts). In addition to clause 52.222-43, one of the following two methods of escalation will be awarded, I-FSS-969 or 552.216-70. If your contract was awarded prior to this SCP revision, be sure to request an additional method of escalation for your non-exempt labor categories.
- IAW SCP-FSS-002 (d)(3)(i)(1), words like “typically,” “generally,” or other ambiguous language in reference to the minimum labor category qualifications will no longer be considered acceptable and must be removed from the master Labor Category Descriptions document. Failure to comply with the requirements of the SCP will result in rejection of your modification request. If your contract contains labor categories without any labor category descriptions, those will need to be submitted.
- In recent refreshes the Proposal Price List (PPL) was updated, removing the Federal Most Favored Customer (MFC) tracking and incorporating mathematical formulas to calculate discounts and IFF. When submitting a modification request, your MFC or Basis of Award (BOA) may be renegotiated, for example to remove federal agencies as MFCs or correct mathematical errors in IFF.

GSA will only accept modification requests submitted via GSA eMod for all mods *except* Novations or Change of Name Agreements. For information on enabling eMod submittal capability, go to <http://www.eoffer.gsa.gov/>. It is not necessary to return these instructions to GSA as part of your modification request.

Step 2: Mandatory documents for all MOD requests (must be included)

SECTION I:

Requirements for ALL Modification Requests except Administrative, Novations and Change of Name Agreements

[\(CLICK HERE!!! for instructions on requesting administrative changes to your contract\)](#)

[\(CLICK HERE!!! for instructions on requesting Novations and Change of Name Agreements\)](#)

The following numbered items (1-4) MUST be submitted with all modification requests. If these items are not addressed, the modification may be rejected. You may include multiple requested changes in a single modification request document, rather than submitting separate modification requests.

Note – If firm combines a ‘deletion of SINS’ or ‘deletion of labor categories’ with any other modification type (e.g. EPA), the eMod system will split the modification and create a Rapid Action Modification (RAM) for the administrative portion of request (e.g. deletion, POC change, address change) which may result in rejection of the RAM modification. Therefore, it is imperative that the firm contact their Contract Specialist if multiple actions are to be taken within one submission to prevent any possibility of rejection.

Section I: Checklist of Modification Documents		
#	Documents Required to Be Submitted	Included in Package
1	Contract Compliance Requirements	
2	Signed and Dated Cover Letter	
3	Commercial Sales Practice Format (CSP)/Proposal Price List (PPL)	
4	Service Contract Act (SCA) Matrix	
5	Labor Category Descriptions Document, Training Course Descriptions or Support Products Descriptions as applicable.	

1. Submit a cover letter signed by an authorized negotiator (as identified in your contract) briefly describing your request and the rationale for the request. Also, include the following statement in your cover letter

“By submission of the modification request, {insert Company Name} has certified that all information is current, complete and accurate.”

2. Commercial Sales Practices (CSP) Format Information IAW SCP-FSS-001(j)(3(iv) and (vi):

The eMod system has been enhanced to contain an auto-fillable CSP document for the following types of mods and submods:

a) Pricing:

- i. Temporary Price Reduction
- ii. Permanent Price Reduction (Based on Most Favorite Customer)
- iii. Permanent Price Reduction (Based on Industry Partner Requested)
- iv. Economic Price Adjustment with CPL (EPA with CPL)
- v. Economic Price Adjustment without CPL (EPA without CPL)

b) Additions

- i. Add Labor category(s)
- ii. Add SIN(s)
- iii. Add Service Offerings

c) Deletions

- i. Delete Services
- ii. Delete SIN(s)
- iii. Delete Labor Category(s)

d) Revise Terms and Conditions

- i. Add/Modify CSP (Note that this is a new subtype found under “Revised Terms and Conditions”

- The CSP format as referenced in this document is an auto- fillable module in eMod and not a separate document. In order to download the Proposal Price List (PPL) referenced in this document you must visit the link below that corresponds to your schedule contract. ([CLICK HERE for sample guidance on filling out the CSP](#))
- A PPL is also required. Currently this form is not in eMod and you will need to upload it to the system as a separate attachment; see “References” below for links to the PPL. Only the current version of the PPL as incorporated in the solicitation will be accepted. Inclusion of any other version will result in rejection.
- Identify in PPL all SCA eligible labor categories with asterisks (**) as shown in the example below. (Labor categories shown are for example purposes.)

Labor categories	Hourly Rate
Consultant I	\$85.00
Subject Matter Expert	\$175.00
Administrative Assistant**	\$38.00
Accounting Clerk **	\$30.00

- Provide the entire contract price list in the most current PPL format (see “References” on page 2). This shall include new and existing labor categories, support products, and/or training courses.
- Detailed instructions on submitting the CSP in eMod can be found at [Click here](#) or at <http://eoffer.gsa.gov/> , approximately half way down under “About eOffer”. The document is titled “When to submit a CSP.”
- “In lieu of” language regarding the CSP or PPL disclosures will not be accepted and inclusion will result in rejection.
- If there are no changes in your existing CSP or PPL, you may state there are no changes and provide an updated copy which will be validated as current, accurate, and complete.

Note: The PPL is not to be reformatted or changed. It needs to be completed and submitted in exactly the same format incorporated in the Solicitation or your modification will be rejected.

Schedule Name and Solicitation No.		PPL Document Title
PSS - FCO00CORP0000C	Click for link to solicitation	07-Proposal Price List Preparation
PSS - FCO00CORP0000C	Click for link to solicitation	08- Commercial Sales Practice Format (CSP-1)

Submit the information specific to your modification request per the instructions below IAW SCP-FSS-002(d)(3)(iv). All new/revised pricing, labor category/training course/support product descriptions, and the SCA matrix must be submitted in Excel or MS Word format that is not read-only. **(PDF files will not be accepted).**

3. Service Contract Act (SCA) Matrix:

- If there are SCA eligible labor categories currently on contract or proposed, please submit a SCA matrix and language IAW SCP-FSS-002 SPECIFIC PROPOSAL MAR 2014 (d) (3) (iv) (7) as shown in the example below.

SCA Matrix

SCA Eligible Contract Labor Category	SCA Equivalent Code - Title	WD Number
Administrative Assistant	01011 - Accounting Clerk I	05-2059
Secretary	01311 - Secretary I	05-2059

The Service Contract Act (SCA) is applicable to this contract and it includes SCA applicable labor categories. The prices for the indicated (**) SCA labor categories are based on the U.S. Department of Labor Wage Determination Number(s) identified in the SCA matrix. The prices awarded are in line with the geographic scope of the contract (i.e. nationwide).

- If your contract does not have any SCA applicable labor categories, please insert the following language into your request:

The Service Contract Act (SCA) is applicable to this contract as it applies to the entire Professional Services Schedule and all services provided. While no specific labor categories have been identified as being subject to SCA due to exemptions for professional employees (FAR 22.1101, 22.1102 and 29 CRF 541.300), this contract still maintains the provisions and protections for SCA eligible labor categories. If and / or when the contractor adds SCA labor categories / employees to the contract through the modification process, the contractor must inform the Contracting Officer and establish a SCA matrix identifying the GSA labor category titles, the occupational code, SCA labor category titles and the applicable WD number. Failure to do so may result in cancellation of the contract.

- Identify the Wage Determination (WD) Number(s) you used to ensure prices will meet or exceed minimum SCA direct labor and fringe benefit requirements. Specify the revision number and revision date identified in the latest index of the WDs located in Document #12 for non standard wage determinations and in Document #13 for standard wage determinations of your contract. Also specify the state and area associated with the WD.

Schedule Name and Solicitation No.		PPL Document Title
PSS - FCO00CORP0000C	Click for link to solicitation	12-SCA Wage Determinations - non standard
PSS - FCO00CORP0000C	Click for link to solicitation	13- SCA Wage Determinations - standard

- Cross-reference all the identified SCA eligible labor categories to the SCA equivalent labor category title. Titles/descriptions are available at <http://www.wdol.gov>. Click on the “library” link, and then download the SCA Directory of Occupations 5th Edition. Utilize the table format below. (Labor categories shown are for example purposes).

4. Labor Category Descriptions Document, Training Course Descriptions or Support Products Descriptions as applicable:

- a) Labor Category, Fixed Priced Services, Support Products and Training Course descriptions shall be submitted as part of the GSA Price List on a separate MS Word document.
 - i The Labor Category Description Document shall include at a minimum the following:

1. All currently awarded labor categories
 2. Proposed new labor categories and identified as proposed new labor categories
 3. Functional Responsibilities for each labor category
 4. Minimum years of experience
 5. Minimum Education
 6. Any applicable training or certification requirements
 7. Any applicable substitution equivalents to the minimum education / experience requirements and methodologies used in accordance with SCP-FSS-002 (c) (8).
 8. IAW SCP-FSS-002 (d)(3)(i)(1), words like “typically”, “generally”, or other ambiguous language in reference to the minimum qualifications will no longer be considered acceptable and must be removed from the master Labor Category Descriptions document. Failure to comply with the requirements of the SCP will result in rejection of your modification request.
- ii The Support Product Description Document shall include at a minimum:
1. All currently awarded support products
 2. Proposed new support products and identified as proposed new support products
 3. Product descriptions
- iii The Training Course descriptions shall include at a minimum:
1. All currently awarded training courses
 2. Proposed new training courses and identified as proposed new training courses
 3. Training Course Description
 4. Course Length
 5. Minimum / Maximum # of Participants

Step 3: Select a MOD Type (follow instructions per MOD type request)

SECTION II

Economic Price Adjustments based on a Commercial Price List (CPL)

Section II: CPL Modification Checklist		
#	Documents Required to be Submitted	Included in Package
1	Section I Documents	
2	Commercial Price List with Effective Date	
3	Supporting Documentation (Invoices etc.)	
4	EPA Pricing Worksheet	

1. [Is a CPL right for you? CLICK HERE](#)
2. **IAW SCP-FSS-002 SPECIFIC PROPOSAL INSTRUCTIONS FOR SERVICES (MAR 2014)(d)(3)(iv)**
Service Contract Act: Escalation was clarified and all non professional labor categories (SCA covered) shall be escalated IAW 52.222-43 Fair Labor Standards Act and Service Contract Act Price Adjustment (Multiple Year and Option Contracts). In addition to clause 52.222-43, one of the following two methods of escalation will be awarded, I-FSS-969 or 552.216-70. If your contract was awarded prior to this SCP revision, be sure to request an additional method of escalation for your non-exempt labor categories.
3. State that you are requesting an Economic Price Adjustment (EPA) in accordance with EPA Clause 552.216-70. Identify the amount of EPA being requested, pursuant to the changes in the CPL. Note: The percent increase cannot be greater than the annual cap in the contract and the percent increase between your awarded CPL and new CPL prices.
4. State that all prices offered to GSA include the current 0.75% IFF.
5. Provide a copy of the current CPL with its effective date.
6. Verify that the requested EPA does not negatively affect the discount relationship with the Basis of Award (BOA) customer(s) established at time of award (or last modification; whichever is more recent).
7. Provide documentation supporting the reasonableness of the price increase. Supporting pricing documentation may consist of published and publicly available commercial catalogs/price lists, copies

of invoices, contracts, quote sheets, etc.,

- Submit an EPA Pricing Worksheet showing the rates proposed. The spreadsheet should show all awarded items, the current prices, the requested increase percentage, the requested new price, the current CPL price, the new CPL price and the CPL percent increase. An example follows:

Labor Category	Current Price w/ IFF	Requested % Increase	New Requested Price w/ IFF
Consultant	\$100.00	2.50%	\$102.50
Analyst	\$ 80.00	2.50%	\$ 82.00

Labor Category	Current CPL Price	New CPL Price	CPL % Increase
Consultant	\$125.00	\$128.13	2.50%
Analyst	\$100.00	\$102.50	2.50%

Economic Price Adjustments based on Market Pricing

Section II: Market Indicator Modification Checklist		
#	Documents Required to be Submitted	Included in Package
1	Section I Documents	
2	Copy of the Agreed Upon Market Indicator	
3	EPA Pricing Worksheet	

- IAW SCP-FSS-002 SPECIFIC PROPOSAL INSTRUCTIONS FOR SERVICES (MAR 2014)(d)(3)(iv) Service Contract Act: Escalation was clarified and all non professional labor categories (SCA covered) shall be escalated IAW 52.222-43 Fair Labor Standards Act and Service Contract Act Price Adjustment (Multiple Year and Option Contracts). In addition to clause 52.222-43, one of the following two methods of escalation will be awarded, I-FSS-969 or 552.216-70. If your contract was awarded prior to this SCP revision, be sure to request an additional method of escalation for your non-exempt labor categories. State that you are requesting an Economic Price Adjustment (EPA) in accordance with EPA Clause I-FSS-969. Identify the amount of EPA being requested. Note: The percent increase cannot be greater than the annual cap in the contract.
- State that all prices offered to GSA include the current 0.75% IFF.
- Submit a copy of the market indicator that was agreed upon at the time of award (or modification, whichever is most recent).

- Submit an EPA Pricing Worksheet showing the rates proposed. The spreadsheet should show all awarded items, the current prices, the requested increase percentage, and the requested new price. An example follows:

Labor Category	Current Price	Requested % Increase	New Requested Price
Consultant	\$100.00	2.50%	\$102.50
Analyst	\$ 80.00	2.50%	\$ 82.00

Note: The percent increase cannot be greater than the annual cap in the contract, nor can it be greater than the market indicator demonstrates (for example, if your contract is based on a BLS ECI table, and the current published increase is 2.5%, you could not receive more than a 2.5% EPA).

- If pricing is based on commercial market rates with an Economic Price Adjustment at a fixed rate escalation, clause I-FSS-969 (b) (1), include pricing for the remaining contract years, including all option periods, with the annual escalation percentage (e.g. 2%) stated in the price list.
- Verify that the requested EPA does not negatively affect the discount relationship with the BOA established at time of award (or last modification, whichever is more recent).

Types of Modifications: EPA Based on Service Contract Act (SCA)

Section II: SCA (EPA) Modification Checklist		
#	Documents Required to be Submitted	Included in Package
1	Section I Documents	
2	Current/Wage Determinations (WD) by Number	
3	EPA Pricing Worksheet	

(Note: Applicable to price changes IAW clause 52.222-43, Fair Labor Standards Act and SCA Price Adjustment (Multiple Year and Option Contracts), due to incorporating revised wage determinations into the contract)

- Identify the current and new wage determinations (WD) by number, revision number, and date of last revision.
- Provide spreadsheet(s) identifying the original and changed direct labor and/or health and welfare benefit rates, and applicable costs (e.g., FICA, FUCA, SUTA, Workmen’s Compensation). Provide the information showing how you calculated the changes in an Excel spreadsheet format so that the calculations may be verified by the reviewer.

3. Provide a spreadsheet showing the current contract rates, the total amounts to be added due to the WD increases, and the resulting new rates (see sample template below; labor category, dollars and percentages shown are for example purposes).

DOL Code	DOL Labor Category	Awarded WD Rate	New WD Rate	Net Hourly Increase	Wage Burden	H & W Increase	Total Adjustment	Awarded Hourly Rate	New Hourly Rate
21410	Warehouse Specialist	\$ 14.97	\$ 15.55	\$ 0.58	\$ 0.09	\$ 0.15	\$ 0.82	\$ 32.19	\$ 33.01
Wages Associated Burden: The Amount of burden associated with Social Security (FICA).									
Unemployment Taxes (FUTA/SUTA) and Workman's Comp Insurance.									
Associated Burden equals 15.28% of labor total:				FICA =	7.65%				
				FUTA =	0.80%				
				Suta =	3.16%				
				Workman' Comp Ins. =	3.67%				
Health & Welfare Rate: The H & W rate increase in the revised WD is: \$ 3.50 - \$ 3.35 = \$ 0.15 per hour.									

Requesting New Labor/ Services Categories or Changes to Existing Labor/Services Categories

Section II: New Labor Categories/Services Modification Checklist		
#	Documents Required to be Submitted	Included in Package
1	Section I Documents	
2	Supporting Documentation (Invoices, etc.)	

1. Identify under which Special Item Number(s) (SIN(s)) the labor categories will be applicable.
2. Provide labor category descriptions that include minimum education and minimum experience requirements for each labor category. IAW SCP-FSS-002 (d)(3)(i)(1), words like “typically”, “generally”, or other ambiguous language in reference to the minimum qualifications will no longer be considered acceptable and must be removed from the master Labor Category Descriptions

document. Failure to comply with the requirements of the SCP will result in rejection of your modification request.

3. Provide a pricing structure consistent with your commercial practices and provide supporting documentation for each proposed labor category. Supporting pricing documentation must be clear and demonstrate a relevant relationship between the supporting document and the pricing proposed IAW SCP-FSS-001(j)(3(iii)). Each supporting document must be labeled with the name of the corresponding proposed labor category. Examples of supporting evidence may include invoices, contracts, quote sheets, etc.
4. **Adding Existing Labor Categories to Other SINs:** If you wish to have currently awarded labor categories be applicable to existing SINs, this should be stated in the modification request letter and the updated PPL document.

Requesting New Other Direct Costs (ODC) under SIN(s) C541-1000 or 541-1000

Section II: New third party ODC Support Modification Checklist		
#	Documents Required to be Submitted	Included in Package
1	Section I Documents	
2	Supporting Documentation (Invoices, etc.)	

1. Identify under which SIN(s) the products will be applicable.
2. Provide descriptions for the items (if not self-explanatory by the name of the product on the price list), including unit of measure (e.g., each) and/or quantities (e.g., 5 per set).
3. Provide a pricing structure consistent with your commercial practices and provide supporting documentation for each proposed product. Supporting pricing documentation must be clear and demonstrate a relevant relationship between the supporting document and the pricing proposed. Each supporting document must be labeled with the name of the corresponding proposed product.
4. Examples of supporting evidence include invoices, contracts, quote sheets, etc., that show you have either sold or offered the product/service to a customer in the past.
5. Add other direct costs (ODCs) to the appropriate section of the PPL and include the relevant disclosures.

OTHER DIRECT COSTS (additional guidance):

There is no Economic Price Adjustment clause applicable to awarded ODCs awarded under SIN(s) C541-1000

or 541-1000. In the event that a price adjustment is required because the price offered by the third-party supplier has increased, prices for ODCs will be revised based on supporting documentation for price adjustment. Requests must include documentation that the cost of obtaining the ODC from the third-party supplier has increased.

The contractor shall provide all resources including personnel, management, supplies, services, materials, equipment, facilities, and transportation necessary to provide a wide range of advertising and integrated marketing services as specified in each task order. Labor categories, supplies, services, materials, equipment, transportation, etc., which support the overall performance of advertising and integrated marketing services procured under the Advertising & Integrated Marketing Solutions SIN, are considered other direct costs (ODCs). Authorized users shall procure ODCs only in support of the schedule contractor's overall advertising and integrated marketing services effort. **No authorized user shall place orders only to procure the schedule contractor's ODCs.**

To the extent possible, all anticipated ODCs associated with performance within the scope of the contract must be offered and have an established contract price. All ODCs proposed must be directly related to a service being offered under this SIN and can only be purchased in support of the services. Possible ODCs may include items such as audiovisual equipment, facility rental, commercial production, media costs, booth space rental, etc. that are associated with the services to be performed under the schedule contract. Note: the category of "miscellaneous" is not an acceptable ODC and will not be awarded under this SIN. The ODC must be identified and be specific. The contract may be modified at any time to add/delete/change ODC(s) as appropriate to respond to a task order. ODCs not approved on schedule may not be included as part of a GSA Schedule order (see note under Pricing Instructions). **Travel and per diem are not ODCs.**

ODC's are normally priced at actual costs (price invoiced to you) plus industrial funding fee and are established at maximum ceiling amounts.

Any commissions received for media placement, conference planning, etc. will either (a) be returned to the ordering agency or (b) applied as a credit to the cost of the project, whichever the ordering agency prefers.

Requesting New Support Products or Changes to Awarded Support Products

Requesting New Training Courses or Changes to Awarded Courses

Section II: New Training and Support Products Modification Checklist		
#	Documents Required to be Submitted	Included in Package
1	Section I Documents	
2	Supporting Documentation (Invoices, etc.)	
3	Course Description Documents	

Provide a pricing structure consistent with your commercial practices and provide supporting documentation for each proposed course. Supporting pricing documentation must be clear and demonstrate a relevant relationship between the supporting document and the pricing proposed. Each supporting document must be

labeled with the name of the corresponding proposed course. Examples of supporting evidence may include invoices, contracts, quote sheets, etc. Use the format below for each course.

1. Title and brief description of the course, including major course objectives
2. Length of course (number of hours/days)
3. Minimum/Maximum number of participants
4. Price for additional students above minimum (if applicable)
5. Support materials provided as part of the course (e.g., training manuals, CDs, DVDs)
6. Commercial price of course ("N/A" if offering market-based prices)
7. Discount % offered to GSA ("N/A" if offering market-based prices)
8. Price of course offered to GSA (excluding IFF)
9. Price of course offered to GSA (including IFF)

Adding Special Item Numbers (SINs)

Labor Categories/Courses/Products/Services Applicable to the SIN(s) Requested

Section II: Add SIN Modification Checklist		
#	Documents Required to be Submitted	Included in Package
1	Section I Documents	
2	Project Descriptions for 2 Projects	
	If Adding Labor Categories/Products/Training Courses:	
3	Supporting Documentation (Invoices, etc.)	

1. All requirements stated in SCP-FSS-002-(d)(2)(i) must be addressed and included in the modification package.
2. State in your cover letter whether your existing labor categories/courses/items are sufficient to cover the new SIN(s) being requested, and if so, which ones are to be covered under the new SIN(s) requested. You may include all requested labor categories/products/courses fixed price services, changes in a single modification request document.
3. Any existing labor categories, products, courses, or fixed price services identified for the proposed new SIN(s) must be relevant to the services covered in the SIN description. Thus, you should identify only those labor categories, products, courses, or fixed price services that will be utilized to perform services under the proposed SIN.
4. For each SIN requested, submit project descriptions for two (2) projects that are relevant to the SIN you are seeking. Each project description must be prepared in accordance with provision SCP-FSS-002 Specific Proposal Submission Instructions (FEB 2012) (Alternate I - DEC 2010) (b) Section II Technical

Proposal, (2) Factor Two Relevant Project Experience paragraphs i - vi. The specific information for submittal of project descriptions as required by this clause follows:

- (i) For each service SIN offered, the offeror must provide descriptions of two (2) projects. Each description must state the SIN to which it applies, and identify the specific services being proposed for that SIN.
- (ii) The projects must either have been completed within the last two years or be ongoing. For ongoing contracts with a base year and option years, at a minimum, the base year must have been completed; for multiyear task orders, at a minimum, the first year must have been completed.
- (iii)
- (iv) The offeror must demonstrate that the tasks performed are of a similar complexity to the work solicited under each SIN. The offeror may provide the same project for more than one SIN as long as the description identifies which specific work relates to each SIN.

All examples of completed services must have been found to be acceptable by the client. Project descriptions shall not exceed four (4) pages per project.

- (v) Each project description shall include the following customer reference information:

- (A) Customer/Client Name
- (B) Project Name/Contract Number
- (C) Customer Point of Contact for Project
- (D) POC's phone number and email
- (E) Project performance period (include months/years)
- (F) Dollar value of the entire project
- (G) Dollar value received for the work performed relevant to the SIN offered
- (H) Brief summary of the project as a whole (background, purpose, etc.)
- (I) A copy of the Statement of Work for the project; this does not count against the limitation of four pages per project.

- (vi) As applicable, each project description shall include a narrative account of the work performed that addresses the following elements:

- (A) Detailed description of SIN relevant work performed and results achieved
- (B) Methodology, tools, and/or processes utilized in performing the work
- (C) Demonstration of compliance with any applicable laws, regulations, Executive Orders, OMB Circulars, professional standards, etc.
- (D) Project schedule (i.e., major milestones, tasks, deliverables), including an explanation of any delays
- (E) How the work performed is similar in scope and complexity to that described in the Statement of Work (Part I of this solicitation)
- (F) Demonstration of specific experience and/or special qualifications detailed in the Statement of Work (Part I of this solicitation)

- (vii) Substitution for Relevant Project Experience: If project experience does not exist, the offeror may substitute relevant projects of predecessor companies or key personnel that will be

performing major aspects of the work. If the offeror chooses to make such a substitution, the narratives must clearly identify the entity or personnel that performed the services, and include all elements of (b)(2)(v) of this provision.

The full text of provision SCP-FSS-002 is included in the Multiple Award Schedule solicitations which can be accessed under "References" on page 2, once there, click on solicitation".

5. Provide a pricing structure consistent with your commercial practices and provide supporting documentation for each proposed SIN and applicable labor categories, products, courses, or fixed price services. Supporting pricing documentation must be clear and demonstrate a relevant relationship between the supporting document and the pricing proposed. Each supporting document must be labeled with the name of the corresponding proposed labor categories, products, courses, or fixed price services. Examples of supporting evidence may include invoices, contracts, quote sheets, etc.

Requirements for Novations or Change of Name Agreements

Section II: Novation/Change of Name Modification Checklist		
#	Documents Required to be Submitted	Included in Package
1	Legal Signed Documents (Originals)	
2	Subcontracting Plan (if applicable)	

Note: Legal Documents must be sent in hard copy for Novations and Change of Name Agreements, rather than electronically.

Note: Do not create the electronic modification request until the hard copy documents have been reviewed by your CO. Once the review is complete you will be requested to submit the Novation eMod request.

1. If you are requesting that GSA recognize a novation or change of name agreement that has already been **processed by another federal agency/organization**, a signed copy of the modification must be provided and **must** include your GSA contract as one of the affected contracts impacted by the Novation or Change of Name. The signed modification must also include the incorporated Novation or Change of Name Agreement and Exhibit A identifying the GSA contract.
2. Prior to submitting a modification, please review Federal Acquisition Regulation (FAR) 42.1202 (a) and (b) to determine whether you should submit a novation or change of name agreement to GSA for the subject contract. You may access this information at the following link: [Novation and Change-of-Name Agreements](#).

Or go to the FAR at www.acquisition.gov/far, Part 42 – Contract Administration and Audit Services, 42.12 Novation and Change of Name Agreements.

3. If you determine GSA is the responsible agency for the initial processing of your Novation/ Change of Name Agreement modification, submit ALL documents required by regulation (FAR 42.1204(e) and (f) for novation or FAR 42.1205 for change of name agreement)
 - a. Confirm the name of your GSA Contract Specialist (see the eLibrary instructions in the first paragraph of the modification instructions).
 - b. Mail the original documents to your specific Contract Specialist at:
General Services Administration
Management Services Center
400 15th Street SW
Auburn, WA 98001-6599

Ensure you include **three original signed documents**, a list of all government contracts affected by the change, and the Contracting Officer/Administrative Contracting Officer name, address, telephone number, and e-mail for each affected government contract. Include the additional information as described in the next section.

NOTE: For novations, the “transferor” is the company that holds the government contract that needs to be modified. Example: ABC Company has been bought by XYZ Company. In this example, the “transferor” is ABC Company and the “transferee” is the XYZ Company.

GSA is required by federal regulation to determine if the transferee is a responsible party to receive a federal contract. Therefore, please include either in your modification request cover letter or as an attachment to the cover letter the following information about the transferee:

- a) State that the transferee has ensured that the registrations in SAM are current, accurate, and reflect the NAICS code(s) for the contract being transferred. SAM registration is at www.sam.gov. Confirm that the transferee and all the officers of the transferee’s company are not currently debarred or suspended from receiving federal contracts.
- b) Identify whether the transferee has any existing GSA Schedule contracts, and if so, the contract numbers of those contracts, along with the name, title, telephone number, email address, and mailing address of the applicable Contracting Officer.
- c) State whether or not the DUNS is changing and provide the new DUNS if it is changing.
- d) Provide the following information:
 - I. Name of new point of contact for Contract Administration and all Authorized Negotiators. For each individual include the following:
 - II. Title
 - III. Phone # and extension
 - IV. Fax #
 - V. Address- if different from contract address (address in SAM) ensure this is noted.
 - VI. Email address

VII. Identify which Authorized Negotiators can sign and commit the company

- e) Provide company website address.
- f) In accordance with clause 52.219-28, Post Award Small Business Program Re-representation, paragraph (b) (1), you must re-represent your business size in SAM. Once this re-representation is done, you must submit a "Representation of Size" modification via the eMod system in order for GSA to recognize your new business size.
- g) If the transferor was awarded as a small business and the transferee is other than a small business for the NAICS code(s) established in the contract, then the transferee must complete and submit a subcontracting plan from the current solicitation with the modification request. You can submit the request to add a subcontracting plan via the eMod system.

SECTION III - Special SIN Requirements

Environmental Services

ADDITIONAL TERMS AND CONDITIONS REQUIRED FOR SIN C899-5 and 899-5, Materials and Waste Recycling and Disposal Services. In an effort to support safe and protective recycling and disposal efforts and encourage improvements in best management practices the offeror is required to submit the following:

- a.) Provide a summary of documentation process used through final disposition of all materials obtained and/or generated. (Required if offering recycling and/or disposal services.)
- b.) Provide a summary of methods used for tracking material to final destination. (Required if offering recycling and/or disposal services.)
- c.) Acknowledge understanding and/or compliance with environmental laws and regulations and guidelines pertaining to recycling and/or disposal.
- d.) Provide a summary of firm's data security process (e.g., process used for destruction of hard drives). (Required if offering recycling services.)
- e.) Provide a summary of warehousing process. (Required if offering recycling services.)
- f.) Provide process flow identifying ownership of all parts involved in electronic recycling (e.g., transfer of CERCLA liability). (Required if offering recycling services.)

- g.) In the event subcontractors are used for recycling and/or disposal services, the Offeror must identify who the subcontractors are OR certify that the Offeror understands that subcontractors may be required to be identified in any resultant task order issued by an ordering agency. This is to ensure adequate tracking of recycling and/or disposal process.

Firms providing electronic recycling services and/or ewaste disposal are required to provide a copy of third party certification such as R2 or e-Stewards with submission of offer. If adding these types of services after award of contract through the modification process, firm will be required to submit certification with modification request. Websites available for certification include but are not limited to: www.decideagree.com which provides additional information relating to the R2 accredited certification programs for electronic recyclers OR <http://e-stewards.org/certification-overview/how-to-become-an-e-stewards-recycler/> which provides additional information relating to the e-Stewards accredited certification program. Guidance for R2 accredited certification programs included under document 14 and guidance for e-Stewards accredited certification programs included under document 15.

Language Services
Requesting Translation Services for New Languages

Section II: New Languages Modification Checklist		
#	Documents Required to be Submitted	Included in Package
1	Section I Documents	
2	Supporting Documentation (Invoices, etc.)	

1. Identify under which SIN(s) the translation services will be applicable.
2. Provide specific languages, or groups of languages that are closely related (all languages covered within a group must be specified). Vague or overly general groups such as "all other languages" will not be accepted by the Government.
3. Provide a pricing structure consistent with your commercial practices and provide supporting documentation for each language. Supporting pricing documentation must be clear and demonstrate

a relevant relationship between the supporting document and the pricing proposed. Each supporting document must be labeled with the name of the corresponding language/group offered. Examples of supporting evidence may include invoices, contracts, quote sheets, etc.

Adding Ancillary Repair and Alteration Services

(Note: Applicable to Logistical Services C874-V, 874 V, C874-597 and 874-597 ONLY)

Contractors wishing to add Ancillary Repair and Alteration services must:

1. Indicate that your firm has reviewed Document 14 in the solicitation entitled “PART II – TERMS AND CONDITIONS – APPLICABLE TO SIN 874-597, ANCILLARY REPAIR AND ALTERATION” and that you agree to the terms and conditions in Document 14 and the incorporation of the clauses in Document 14 into your contract. The solicitation is found at www.gsa.gov/logworld, under LOGWORLD - Solicitation.
2. Submit pricing that is inclusive of the IFF and identify the Davis-Bacon Act (DBA) general decision number and specific modification number used in establishing your proposed rates. Identify only DBA labor categories and prices as shown in the example below.

Labor Categories	GSA Price (inclusive of IFF)	DBA General Decision Number	Modification Number
Carpenter			
Electrician			

3. Pricing may be based on an established commercial price list or market-based prices. In either event, provide adequate price supporting information/data in the form of invoices, contracts or some similar documentation. Invoices must be less than one year old. Services must be priced in accordance with FAR 8.404(d), and will be either hourly rates or fixed price for performance of a specific task (e.g., installation, maintenance and repair). Standard commercial pricing methods may be proposed. Regardless of the method used, it must be supported by documentation and address a reasonable method of pricing. Please note: FAR 16.102(c) prohibits use of the cost-plus-percentage-of-cost system of contracting. Therefore, offers using this proposed method for SIN 874-597 will be rejected. The proposed pricing must include sufficient information for each service offered to enable the reviewing Contracting Officer to perform a price analysis.
4. All identified DBA eligible labor categories must be mapped in a matrix to the appropriate DBA general decision number (available at <http://www.wdol.gov>) that will be incorporated into the contract. Utilize the following spreadsheet format (labor category shown is for example purposes):

DBA eligible contract category	State	Construction Type(s)	DBA General Decision Number
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Carpenter	WA	Building, Heavy and Highway	WA080009
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Submit a document that includes all labor categories, prices, and labor category descriptions, as well as any applicable DBA matrix and narrative, which will be incorporated into your contract.

SECTION IV: FAQs and Guidance

Questions Regarding eMod Submissions

- Before calling the eTools support line, please see the [Interactive Help Center](#) for eMod submission instructions.

Is a Commercial Price List right for you?

FAR 2.101(a)(6) defines two types of pricing lists:

- (i) "Catalog price" means a price included in a catalog, price list, schedule, or other form that is regularly maintained by the manufacturer or vendor, is either published or otherwise available for inspection by customers, and states prices at which sales are currently, or were last, made to a significant number of buyers constituting the general public; and
- (ii) "Market prices" means current prices that are established in the course of ordinary trade between buyers and sellers free to bargain and that can be substantiated through competition or from sources independent of the offerors.

There are several questions which can help you determine whether or not CPL is the appropriate method of escalation for you.

1. Do you consider your price list proprietary? A CPL is commercially/publically available; therefore if the answer is yes, you do not have a CPL according to FAR 2.101.
2. Are your prices publicly available, i.e., published on your company's website or in a published catalog? If not, you do not have a CPL according to FAR 2.101.
3. Are you currently charging the prices published in your CPL? If your prices are based on market conditions rather than a fixed price list, you do not have a CPL according to FAR 2.101.

If the answer to any of these three questions indicate that you do not really have a Commercial Price List as defined above, then you may request to change your method of escalation to Economic Price Adjustments based on Market Pricing under I-FSS-969.

[eMod or Digital Cert Issues](#)

- A DC is required to access the eMod system, is your's current? If not, please refer to [this section](#) on the eTools page for instructions.
- Systems/navigation/troubleshooting issues can be directed to the eTools Support Team at 1-866-472-9114 or eooffer@gsa.gov

This document is provided for reference purposes only.

The CSP Format is to be completed within the eOffer system. Submission of a separate CSP Format document will not be accepted.

CSP COMMERCIAL SALES PRACTICES FORMAT (Use this format for services)

Name of Offeror: ABC, Inc.

SIN(s): 541-1, 541-2, and 541-4A

Note: Please refer to clause 552.212-70, PREPARATION OF OFFER (MULTIPLE AWARD SCHEDULE), for additional information concerning your offer. Provide the following information for each SIN (or group of SINS or SubSIN for which information is the same).

(1) Provide the dollar value of sales to the general public/state or local government at or based on market prices, cost build up or an established catalog or market price during the previous 12-month period or the offerors last fiscal year: \$350,000.00. State beginning and ending of the 12-month period: Beginning January 1, 2011 Ending December 31, 2011. In the event that a dollar value is not an appropriate measure of the sales, provide and describe your own measure of the sales of the item(s). In the event sales are made only to state or local governments, identify such sales accordingly.

(2) Show your total projected **annual sales to the Government** under this contract for the contract term, excluding options, for each SIN offered. If you currently hold a Federal Supply Schedule contract for the SIN the total projected annual sales should be based on your most recent 12 months of sales under that contract.

(NOTE: minimum total combined SINS should at least be \$25,000)

SIN	\$	SIN	\$	SIN	\$
C 541-1	\$10,000	C 874-1	\$15,000	C 871-7	\$10,000

(3) Based on your written discounting policies (standard commercial sales practices in the event you do not have written discounting policies), are the prices (discounts, concessions, terms and conditions in any combination) which you offer the Government equal to or better than that offered to any customer acquiring the same items regardless of quantity or terms and conditions? YES ___ NO ___. (See definition of "concession" and "discount" in 552.212-70.) (NOTE: Put an "X" after either "YES" or "NO" in paragraph 3)

- (4) (a) Based on your written pricing policies (standard commercial sales practices in the event you do not have written pricing policies), provide information as requested for each SIN (or group of SINs for which the information is the same). The information should be provided in the chart below or in an equivalent format developed by the offeror. Rows should be added to accommodate as many customers as required.

Column 1 – Customer	Column 2 –Price* (*Disclosures should be made on a separate sheet)	Column 3 – Quantity/Volume	Column 4 – Discounts, Concessions, Terms and Conditions
<p>List Most Favored Customer(s) by name(s) or category of customers</p> <p>Example 1: XYZ Company See Price List Preparation Spreadsheet</p> <p>Example 2: All Commercial Customers See Price List Preparation Spreadsheet</p>	<p>List across the board discount by direct labor category or task X%</p> <p>Example 1: 10% See Price List Preparation Spreadsheet</p> <p>Or: Range of discounts by direct labor category or task: X% - X%</p> <p>Example 2: 3% - 9% See Price List Preparation Spreadsheet</p>	<p>State Quantity/Volume Discount(s) offered to your MFC</p> <p>Example 1: NONE</p> <p>Or:</p> <p>Example 2: +.5% = > \$250,000 (applicable to direct labor or task only)</p>	<p>State other Payment Discount Term(s) offered to your MFC</p> <p>Example 1: Net 30 Days</p> <p>Or:</p> <p>Example 2: +.25% 15 Days, Net 30 Days</p>

(b) Identify prices offered to GSA in response to this solicitation for services using the table below:

Column 5 – Price Offered to GSA	Column 6 – Unit of Issue (e.g., per hour, per day)	Column 7 – Quantity/Volume	Column 8 – Discount, Concessions, Terms and Conditions Offered to GSA
<p>List GSA basic discount offered:</p> <p>Either across the board discount by direct labor category or task X%</p> <p>Example 1: 11% See Price List Preparation Spreadsheet</p> <p>Or: Range of discounts by direct labor category or task:</p>	<p>List Unit of Issue</p> <p>Example 1: Each See Price List Preparation Spreadsheet</p> <p>Example 2: Lot See Price List Preparation Spreadsheet</p>	<p>List GSA offered Quantity/Volume Discount(s) offered</p> <p>Example 1: NONE</p> <p>Or:</p> <p>Example 2: +1% = > \$250,000 (applicable to direct labor or task only)</p>	<p>List GSA offered Payment Terms</p> <p>Example 1: Net 30 Days</p> <p>Or:</p> <p>Example 2: +.5% 15 days, Net 30</p>

<p>X% - X%</p> <p>Example 2:</p> <p>4% - 10% See Price List Preparation Spreadsheet</p>			
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(b) Do any deviations from your written policies or standard commercial sales practices disclosed in the chart in paragraph 4(a) ever result in better prices than indicated? YES ____ NO _____. If YES, explain deviations in accordance with the instructions at Figure 5 15.4-2, which is provided in this solicitation for your convenience. **(NOTE: Put an “X” after either “YES” or “NO” in paragraph 4(c))**

Figure 515.4-2—Instructions for Commercial Sales Practices Format (CSP) (Format for Services)

If you responded “YES” to question (3), on the **COMMERCIAL SALES PRACTICES FORMAT**, complete the chart in question (4)(a) for the customer(s) who receive your best price. If you responded “NO” complete the chart in question (4)(a) showing your written policies or standard sales practices for all customers or customer categories to whom you sell at a price that is equal to or better than the price(s) offered to the Government under this solicitation or with which the Offeror has a current agreement to sell at a price which equals or exceeds the price(s) offered under this solicitation. Such agreement shall be in effect on the date the offer is submitted or contain an effective date during the proposed multiple award schedule contract period. If your offer is lower than your price to other customers or customer categories, you will be aligned with the customer or category of customer that receives your best price for purposes of the Price Reduction clause at 552.238-75. The Government expects you to provide information required by the format in accordance with these instructions that is, to the best of your knowledge and belief, current, accurate, and complete as of 14 calendar days prior to its submission. You must also disclose any changes in your price list(s), discounts, prices and/or policies that occur after the offer is submitted, but before the close of negotiations. If your pricing practices vary, the variations should be explained clearly to include a description of the circumstance, frequency, and selling terms and conditions. You may limit the information reported to those services that exceed 75% of actual historical Government sales (commercial sales may be substituted if Government sales are unavailable) value of the special item number (SIN).

Column 1—Identify the applicable customer or category of customer. A "customer" is any entity which acquires supplies or services from the Offeror. The term customer includes, but is not limited to state and local governments, educational institutions (an elementary, junior high, or degree granting school which maintains a regular faculty and established curriculum and an organized body of students), national accounts, and end users. In any instance where the Offeror is asked to disclose information for a customer, the Offeror may disclose information by category of customer if the offeror's pricing policies or practices are the same for all customers in the category. (Use a separate line for each customer or category of customer.)

Column 2—Identify the price. Indicate the best price (based on your written pricing policies or standard commercial pricing practices if you do not have written pricing policies) at which you sell to the customer or category of customer identified in column 1, without regard to quantity; terms and conditions of the agreements; and whether the agreements are written or oral. If the price is a combination of various discounts (prompt payment, quantity, etc.), each type of discount should be fully identified and explained. If the price lists which are the basis of the discounts given to the customers identified in the chart are different than the price list submitted upon which your offer is based, identify the type or title and date of each price list. The contracting officer may require submission of these price lists. To expedite evaluation, offerors may provide these price lists at the time of submission. If market prices are used, provide documentation to substantiate pricing (e.g., agreements with corporate customers, internal policies, market prices, quote sheets, pricing agreements and invoices, etc.) and identify the effective period, pricing and any other terms and conditions clearly. If prices are based on cost, provide information other than certified cost or pricing data to show how the offeror arrived at the proposed price. A price certification is not required. If rates are audited by a Federal Agency, include this information in the narrative. Disclosures should be made on a separate sheet.

Column 3—Identify the quantity or volume of sales. Insert the minimum quantity or sales volume which the identified customer or category of customer must either purchase/order, per order or within a specified period for the best price. When purchases/orders must be placed within a specified period to get the best price, indicate the time period.

Column 4—Indicate concessions regardless of quantity granted to the identified customer or category of customer. Concessions are defined in solicitation clause 552.212-70, Preparation of Offers (Multiple Award Schedule). If the space provided is inadequate, the disclosure should be made on a separate sheet by reference.

Columns 5-8—Fill in the requested information. If you respond “YES” to question 4 (c) in the Commercial Sales Practices Format, provide an explanation of the circumstances under which you deviate from your written policies or standard commercial sales practices disclosed in the chart on the Commercial Sales Practices Format and explain how often they occur. Your explanation should include a discussion of situations that lead to deviations from standard practice, an explanation of how often they occur, and the controls you employ to assure the integrity of your pricing. If deviations from your written policies or standard commercial sales practices disclosed in the chart on the Commercial Sales Practices Format are so significant and/or frequent that the Contracting Officer cannot establish whether the price(s) offered is fair and reasonable, then you may be asked to provide additional information. The Contracting Officer may ask for information to demonstrate that you have made substantial sales of the item(s) in the commercial market consistent with the information reflected on the chart on the Commercial Sales Practice Format, a description of the conditions surrounding those sales deviations, or other information that may be necessary in order for the Contracting Officer to determine whether your offered price(s) is fair and reasonable. In cases where additional information is requested, the Contracting Officer will target the request in order to limit the submission of data to that needed to establish the reasonableness of the offered price.