MAS Consolidation Phase 3 Overview and FAQs for Current MAS Contractors:
What You Need to Know

This document outlines Phase 3 of MAS Consolidation and is meant to be a resource for our industry partners to help identify if you are part of Phase 3 of MAS Consolidation and if so, how to prepare and execute.

Phase 3 of MAS Consolidation began August 1, 2020, during which time contractors with multiple contracts will consolidate down to one contract per unique entity identifier (UEI), e.g. Data Universal Numbering System (DUNS) number.

Before participating in Phase 3, all current GSA contractors must accept the Phase 2 MAS Consolidation Mass Mod A812. Contractors with multiple GSA contracts must accept the Mass Mod for every contract prior to beginning Phase 3.

The timeline for completion of contract consolidation will be contract-dependent. Due to Blanket Purchase Agreements (BPAs) and open orders, it will take around five years to get all contractors down to one contract per unique entity identifier.
Phase 3 Benefits for Industry

- Streamline Schedule business strategy and reduce overhead.
- Single point of contact with one Procurement Contracting Officer (PCO) for all MAS business.

Phase 3 Benefits for Customers

- Get access to contractors' full suite of awarded offerings on the new single Schedule.
- The organization of SINs by large and subcategories makes it easier for agencies to find industry partners to meet their missions.
- Customers can expect continuity of operations for existing orders and Blanket Purchase Agreements (BPAs) during MAS Consolidation.
- Flexibilities like Order-Level Materials (OLMs) will still be offered under various subcategories.
Frequently Asked Questions (FAQs)

Q1) What is Phase 3? Does Phase 3 Impact me?

If you have multiple MAS contracts per unique entity identifier, you will have actions to take for Phase 3. If you do not have multiple MAS contracts per unique entity identifier, there is nothing required of you in Phase 3.

Phase 3 requires you to consolidate your contracts down to one contract per unique entity identifier (UEI), e.g., Data Universal Numbers System (DUNS) number. In Phase 3, each contractor will put together a consolidation plan documenting how they want to get down to one contract. The MAS PMO will facilitate initial communications with the impacted contractor pool to ensure that the plan and next steps are clear. Ultimately, the timing of contract consolidation and process will be between you and your PCO.

The MAS PMO is available to discuss options for consolidating multiple contracts. If you have reviewed this document and still need assistance, email the MAS PMO at MASPOMO@gsa.gov.
Important: Streamlining for Phase 3

As we move into Phase 3, GSA will streamline the acquisition process by moving impacted contracts to one Procurement Contracting Officer (PCO) wherever possible. The main benefit of this approach is contractors will then have just one PCO to work with instead of having to coordinate across multiple PCOs to plan and execute the actions needed to consolidate their contracts. Prior to moving any contracts, the PCO will complete checks of the contract file. If you receive any requests for information as your PCO is preparing the file for transfer, we ask that you promptly respond. Contracts will only be moved after all transfer requirements are met and documented by the PCO. You will receive a system generated for each contract reassignment.

Q2) How long will it take to complete Phase 3?

Planning will start in August 2020, with transition timing being up to the PCO and the contractor. Our goal is to have all contractor consolidation plans in place by the end of FY21. Due to Blanket Purchase Agreements (BPAs) and open orders, it may take up to five to ten years to get all contractors down to one contract per unique entity identifier.

Q3) I’m part of Phase 3, how do I proceed?

To prepare for Phase 3, you will first need to assess your contracts and come up with a consolidation plan.

Here are some questions you should ask yourself:

1) Do I have more than one contract?
   
   If the answer is NO, Phase 3 does not apply to you.

2) Are any of my contracts small business set-aside (SBSA) contracts (i.e. the contract only has set-aside Special Item Numbers (SINs) that state “NOTE: Small Business Set Aside (SBSA)” in the SIN description)?
   
   If you only have 2 contracts and one is a small business set-aside, Phase 3 does not apply to you.

3) Do all of my contracts have the same unique entity identifier (e.g. DUNS number)?
If the answer is NO, Phase 3 does not apply to you. All contracts must have the same UEI to be included in Phase 3.

4) How many contracts do I have? What are the contract numbers?
5) What is the period of performance on each contract? Do my contracts have more than 5 years left of the 20 year period of performance? When is the next option for each contract?
6) Are any of my contracts follow-on contracts? Which ones?
7) Which contract represents my core business/preponderance of work?
8) What is the size standard for the preponderance of work NAICS for each contract?
9) What is the pricing structure on each of my contracts?
10) Are my contracts TDR or non-TDR?
11) Are any of my contracts at risk of being cancelled for low or no sales (<$25,000 annually)?
   a) Note: At least one of the contracts being consolidated must have sales reported before consolidation can proceed.
12) What is the status of open orders and BPAs on my contracts? If so, what is the period of performance for the BPAs?
13) Do my contracts have audits, claims, legal disputes, OIG investigations, novations?
   a) Note: If one or more of your contracts to be consolidated falls into one or more of these situations, consolidation of the impacted contract(s) will be delayed until there is resolution.
14) Are all contracts to be consolidated fully up to date? This includes ensuring:
   a) All pending mandatory Mass Mods have been accepted,
   b) All sales reporting and Industrial Funding Fee (IFF) remittance is current and accurate,
   c) Any IOA findings have been resolved,
   d) I have migrated to MAS in SIP/EDI
   e) A current and accurate catalog file is published, and
   f) SAM registration is current and accurate.
15) What else is important to you as you approach Phase 3?

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1 A follow-on contract, also referred to as a duplicate or streamlined contract, is awarded with the same SINs as an existing contract to allow contractors to have enough period of performance to pursue Blanket Purchase Agreements.
You will have to weigh your options to develop your plan for Phase 3. Complete the **Phase 3 Contractor Checklist and Plan** with all of your contract information (located on eLibrary and in your contract files), as this will support your plan for consolidation. You must decide if you want to choose one surviving contract to move forward with or would rather submit a new offer encompassing all of your offerings.

**Option 1: I’m going to choose a surviving contract and cancel the others**

If you choose to move forward with a surviving contract, you will need to add SINs and items to your surviving contract by requesting modification(s). SINs, items and negotiated factors, such as delivery and discounts, will not automatically transfer from one contract to another. To complete your modification requests, please review the **MAS Modification Guidance**. Work with your PCO to determine what strategy you should use to accomplish your modifications efficiently (e.g., performing a bulk SIN adds, adding and deleting SINs one at a time, etc). You will need to submit all required documentation and work with your PCO to complete the necessary modification(s). After the modification is approved you will need to update your GSA Price List and GSA Advantage catalog file using SIP or EDI, if applicable.

Once your surviving contract has been modified to add all of your offerings, you will have to identify the earliest possible cancellation date for your other contracts. This cancellation date should take into account any open orders and BPAs. To ensure continuity of service for your customers, you must continue to have a contract as long as you have open orders and BPAs. Once you have determined your earliest cancellation date, do not pursue work that would push that cancellation date out further into the future.

*Note: An expiring contract with a follow-on contract should never be chosen as a surviving contract.*

*Note: Any audits must be complete prior to canceling a contract.*

**Option 2: I’m going to get a new contract and cancel the old one(s)**

Use the **MAS Roadmap** to walk through the process of submitting an offer for all of the SINs, products, services, and solutions you have on your current contracts. You can begin identifying the earliest possible cancellation dates for your other contracts after you have the new contract. This cancellation date should take into
account any open orders and BPAs. To ensure continuity of service for your customers, you must continue to have a contract as long as you have open orders and BPAs. Once you have determined your earliest cancellation date, do not pursue work that would push that cancellation date out further into the future.

*Note: Any audits must be complete prior to canceling a contract.*

Once you have completed the Phase 3 Checklist and have a written consolidation plan, email a copy of your Phase 3 Checklist to your assigned PCO so they can support you through the process.

Find your PCO’s email and phone number at [https://www.gsaelibrary.gsa.gov](https://www.gsaelibrary.gsa.gov) (see Government Point of Contact within the Contractor Information section by entering your contract number or organization’s name in the search block).

**Q4) What are some things I should NOT do during Phase 3?**

1) **Contractors should NOT add every SINs/labor category/course/product/solution to your contract.** Carefully consider which SINs and items your company wants to offer. Not all may be necessary or needed.

2) **Contractors should NOT continue to pursue work on contracts that you plan to cancel.** This goes against the spirit of Phase 3 and will push out your cancellation date.

3) **Contractors should not choose a surviving MAS contract based solely on preponderance of work NAICS code business size** rather than considering all relevant factors at play.

**Q5) How will my small business size standard be handled?**

The small business size standard on your surviving contract will prevail. Contractors will not rerepresent their business size unless the conditions outlined in 52.219-28 occur. Phase 3 is not a rerepresentation opportunity - a rerepresentation typically happens every 5 years at the option renewal.
Q6) How do I learn more about the new MAS Large Categories and get my questions answered?

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If you have additional questions about Phase 3, please reach out to the MAS PMO at MASPOMO@gsa.gov.