



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

The Processes FAS Uses to Ensure It Awards and Collects Accurate Product Data Are Ineffective

Report Number A240054/Q/2/P26002
August 13, 2026

Executive Summary

The Processes FAS Uses to Ensure It Awards and Collects Accurate Product Data Are Ineffective

Report Number A240054/Q/2/P26002

August 13, 2026

Why We Performed This Audit

This audit was included in our *Fiscal Year 2024 Audit Plan*. In prior audits of GSA's pricing tools, we identified: (1) deficiencies in Transactional Data Reporting (TDR) data quality, including the use of inaccurate part numbers; and (2) limited effectiveness of the Price Point Plus Portal. If contracting officers do not have fully reliable and effective data to conduct price analysis, federal customer agencies risk overpaying for products and wasting taxpayer dollars.

Our audit objective was to determine if GSA's systems and processes ensure transactional data submitted by the contractor and the contractor's product catalog contains actual manufacturer part numbers in accordance with applicable regulations and GSA policies.¹

What We Found

Access to accurate and consistent manufacturer names and part numbers is imperative to: (1) maximize the price analysis capability of the GSA Federal Acquisition Service's (FAS's) pricing tools and (2) provide information FAS contracting personnel can use to make fair and reasonable price determinations.

However, we found inaccurate manufacturer names and part numbers for products in the GSA Advantage! catalog and TDR data, including multiple variations for the same product, as well as names and part numbers that did not match those from the manufacturer. We also found that FAS does not standardize part numbers for related product add-ons and base products with options that have a single manufacturer part number for multiple variations, which inhibits identification and comparability across Multiple Award Schedule contracts.

Absent reliable manufacturer name and part number data, FAS's pricing tools cannot identify identical products and provide useful pricing information for contracting officers' use in negotiations, potentially resulting in higher awarded pricing. As a result, federal customer agencies may overpay for products offered on Multiple Award Schedule contracts and waste taxpayer dollars.

¹ Although not specifically mentioned in our audit objective, we also assessed the accuracy of manufacturer names because it is a key data point submitted by Multiple Award Schedule contractors and used by FAS's systems for price analysis.

What We Recommend

We recommend that the FAS Commissioner:

1. Identify and correct existing manufacturer part number and name inconsistencies in TDR and GSA Advantage! catalog data for products to ensure that identical products use the same part numbers.
2. Develop and implement processes that ensure accurate and consistent part numbers are established upon new contract award and modification approval, while continuing to improve TDR data match rates through the *TDR Data Quality Dashboard*.
3. Improve the FAS Catalog Platform's automated data quality checks to ensure that incorrect part numbers are flagged and corrected to minimize the need for FAS contracting personnel to perform manual market research.
4. Provide FAS contracting personnel with tools, guidance, and resources that allow for efficient and effective manual market research.
5. Ensure FAS industrial operations analysts verify the accuracy of TDR data, as required, and verify whether part numbers are consistent with manufacturer sources.
6. Implement processes to ensure identical related product add-ons and base products with options that have a single manufacturer part number for multiple variations can be identified and compared.

The FAS Acting Commissioner agreed with Recommendation 4 and partially agreed with Recommendations 1, 2, 3, 5, and 6. FAS's written comments are included in their entirety in ***Appendix C***.

Table of Contents

Introduction.....	1
Results.....	8
<i>Finding 1 – GSA Advantage! catalog and TDR data include inaccurate manufacturer names and part numbers for products, which impairs price analysis.</i>	<i>8</i>
<i>Finding 2 – FAS does not standardize part numbers for related product add-ons and base products with options that have a single manufacturer part number for multiple variations.</i>	<i>15</i>
Conclusion	19
Recommendations	19
Appendix A – Objective, Scope, and Methodology	25
Appendix B – Product Data System Descriptions.....	28
Appendix C – GSA Comments.....	29
Appendix D – Report Distribution	34

Introduction

We audited the process that the GSA Federal Acquisition Service (FAS) uses to ensure the contractor-submitted Transactional Data Reporting (TDR) and GSA Advantage! catalog data it relies on for price analysis is accurate and complies with applicable regulations and GSA policies.

Purpose

This audit was included in our *Fiscal Year 2024 Audit Plan*. In prior audits of GSA's pricing tools, we identified: (1) deficiencies in TDR data quality, including the use of inaccurate part numbers; and (2) limited effectiveness of the Price Point Plus Portal (4P tool). If contracting officers do not have fully reliable and effective data to conduct price analysis, federal customer agencies risk overpaying for products and wasting taxpayer dollars.

Objective

Our audit objective was to determine if GSA's systems and processes ensure transactional data submitted by the contractor and the contractor's product catalog contains actual manufacturer part numbers in accordance with applicable regulations and GSA policies.

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

Background

GSA's Multiple Award Schedule (MAS) contracts are long-term, government-wide commercial contracts that provide federal, state, and local governments access to millions of products and services at volume discount pricing. The intent of the MAS program is to leverage the federal government's buying power to provide customer agencies with fair and reasonable pricing based on a competitive market. MAS contracts streamline the acquisition process by providing pre-negotiated prices, delivery terms, and warranties. During Fiscal Year 2024, customer agencies and other authorized parties purchased \$11.2 billion worth of products through the MAS program.

Federal Acquisition Regulation 8.404(d), *Use of Federal Supply Schedules*, releases GSA's customer agencies from the responsibility to make their own fair and reasonable pricing determinations. Customer agencies rely on GSA's price reasonableness determinations to ensure orders placed against MAS contracts result in the lowest overall cost alternative for the government.

Importance of Manufacturer Part Numbers

The manufacturer part number serves as the primary data point for FAS contracting personnel's fair and reasonable price determinations. Specifically, FAS's automated pricing tools and manual pricing analysis use manufacturer part numbers to identify prices offered and paid for identical products in the commercial and government marketplaces to award pricing on MAS contracts. For these tools to be most effective, part numbers must be accurate and applied consistently across all MAS contracts and TDR data. To negotiate fair and reasonable pricing and ensure that government customers do not overpay for these products, it is critical that FAS has accurate data to conduct its price analysis.

MAS contractors are required to submit the manufacturer part numbers with their new offer, modification, and TDR data (if applicable). Before awarding MAS contracts or approving contract modifications, GSA contracting officers must review the contractors' submissions to ensure that the part numbers are accurate and determine if the price(s) offered are fair and reasonable.² MAS contractors participating in the TDR pilot are required to report transactional data every month, including part numbers, for products on their respective MAS contracts.³ A part number is incorrect if it does not match the part number assigned by the manufacturer.

FAS's Information Technology Systems

FAS uses a variety of information technology systems to collect, analyze, and store product data (including part numbers) and pricing. MAS contractors submit part numbers for: (1) new contract awards through GSA eOffer, (2) modifications to existing contracts through the FAS Catalog Platform (FCP), and (3) TDR. The part numbers are then used by other information technology systems to find identical products and respective prices.

Figure 1 on the next page presents the information technology systems that are included in FAS's price analysis process and the information flow between these systems.

² Federal Acquisition Regulation 15.403-3(c)(1), *Requiring data other than certified cost or pricing data*.

³ *General Services Administration Acquisition Regulation (GSAR); Transactional Data Reporting*, 81 Fed. Reg. 121 (June 23, 2016) (to be codified at 48 C.F.R. 501, 515, 516, 538, and 552). The Federal Register includes federal agency regulations, executive orders, and proposed rules and notices of interest to the public.

Figure 1. Information Technology Systems FAS Uses to Collect and Analyze Part Numbers

System	General Process Role	Inter-System Information Flow
GSA eOffer	Web-based application that allows contractors to electronically prepare and submit an MAS offer to FAS.	Awarded part numbers flow to the contractor's GSA Advantage! catalog.
GSA Advantage!	Online access to an e-commerce marketplace of millions of products and services offered by thousands of contractors. It is the contractors' approved catalog data.	Part numbers flow to Price Point API (PPAPI)/4P tool and represent a new data point for price analysis.
Sales Reporting Portal	Portal for MAS contractors to report TDR or aggregate-level sales data required by FAS contracts. The part number is included in the contractor's reported data.	TDR data is provided to PPAPI bimonthly. This data is used to compare proposed prices to historical prices paid by government customers and is factored into the PPAPI/4P tool's price analysis.
Price Point API (PPAPI)	Third-party application that provides automated market intelligence and analytical support to GSA contracting officers. It performs a horizontal price analysis by searching for part numbers in commercial and government marketplaces, and TDR data.	Price analysis results are provided directly to FAS contracting personnel through the 4P tool.
Price Point Plus Portal (4P tool) and Compliance & Pricing Reporting Portal (CPRP)	Used by FAS contracting personnel to access PPAPI. It provides unlimited access to PPAPI's market research data and allows FAS contracting personnel to upload contractor-submitted part numbers for automated price and supply chain analysis.	Results are used to negotiate pricing. If PPAPI cannot find a matching part number, FAS contracting personnel must search for an identical product manually. If approved, part numbers flow to GSA Advantage!.
FAS Catalog Platform (FCP)	A web-based application for contractors to upload their catalog to GSA Advantage!. MAS contractors use the FCP to: (1) provide product details, like manufacturer part numbers, on their GSA contracts and (2) submit contract modifications.	Part number data flows to the Authoritative Catalog Repository (ACR) for storage and subsequent price analysis by PPAPI.
Authoritative Catalog Repository (ACR)	A master data repository for GSA Advantage! catalog data. The ACR acts as an intermediary between the FCP and PPAPI.	Part number data in the ACR is published to GSA Advantage! for customer consumption and PPAPI price analysis.
Verified Products Portal (VPP)	Manufacturer-facing portal hosted by a third-party where participants can voluntarily provide product content. This content is provided by manufacturers or their authorized partners and includes, among other things, manufacturer part numbers.	Part numbers and other product data flows directly to GSA Advantage! to supplement product listings.

FAS provided us with the flowchart in **Appendix B** that shows how product data flows among these information technology systems.

Automated and Manual Pricing Analysis

The 4P tool, developed and maintained by FAS, is the automated pricing tool used by GSA contracting officers to determine fair and reasonable pricing.⁴ Contracting officers use the 4P tool to access PPAPI, where the pricing analysis is performed. FAS contracting personnel upload a contractor's proposed pricing into the 4P tool, which then searches for the part number in three sources of product data: (1) TDR data; (2) catalog data from government contract vehicles, and (3) commercial marketplace data, to provide pricing information for identical products.⁵

Using pricing data from these sources, the 4P tool generates a report with a market threshold price for FAS contracting personnel to compare to the contractor's offered price.⁶ More frequent instances of the same part number found in these three data sources allow the 4P tool to analyze more pricing information to refine the market threshold price. Contracting officers then use market threshold pricing to negotiate with MAS contractors.

If the part number is inaccurate and does not match other part numbers of the same product, the 4P tool will not return pricing information. When that happens, FAS contracting personnel must conduct pricing analysis manually by searching commercial sources for the same product.

FAS's Responsibility Over Manufacturer Part Numbers

MAS contractors are responsible for submitting accurate product data, including part numbers, for new offers or modifications. FAS is responsible for reviewing, validating, and ensuring that the contractor-submitted data is accurate. MAS contractors can (and do) submit inaccurate manufacturer part numbers and other product information; therefore, to facilitate good TDR and catalog data quality and maximize pricing tool effectiveness, it is imperative that FAS use and maintain effective processes that ensure the data it collects and stores is accurate and usable.

⁴ According to FAS, the Compliance and Pricing Report Portal (CPRP) replaced the 4P tool on October 1, 2025. However, according to the *CPRP User Guide*, CPRP serves the same function as the 4P tool and accesses PPAPI data. Since the 4P tool was the focus of our audit, and CPRP pulls from the same underlying data, our analysis and results still apply.

⁵ Government catalog data comes from GSA Advantage!, the Defense Logistics Agency's FedMall, and NASA's Solution for Enterprise-wide Procurement. GSA's third-party data enrichment service provider furnishes commercial marketplace data.

⁶ The market threshold price considers: (1) demand data, (2) government and commercial pricing, (3) transactional data, and (4) inflationary trends. It serves as a single data point for FAS contracting personnel to use for fair and reasonable price determinations. The price is calculated using data accumulated in PPAPI.

According to the *GSA MAS Preaward Manual*, if a contractor's offer includes products, FAS contracting personnel must confirm that the manufacturer part numbers are accurate. Further, *GSA's TDR Data Management Plan* states that "While organizations and contractors input data, the steward [FAS] is responsible for maintaining integrity, operation, access control and availability of the system and data."

FAS employs various systems and processes intended to help ensure contractor-submitted manufacturer part numbers are accurate in TDR and GSA Advantage! catalog data. These processes consist of databases that conduct automated product compliance tests, as well as manual checks by FAS personnel and GSA Advantage! users.

Previous Office of Inspector General Reports Identified Issues with TDR Data Quality and Usage

Since the TDR pilot began in 2016, we have issued a series of reports and memorandums identifying concerns about TDR data quality and FAS contracting personnel's ability and willingness to use the data.

Audit of Transactional Data Reporting Pilot Evaluation Plan and Metrics (July 25, 2018).⁷ In this audit, we found that FAS officials were unable to verify or validate TDR data to determine whether it is complete, accurate, and reliable.

GSA's Transactional Data Reporting Pilot Is Not Used to Affect Pricing Decisions (June 24, 2021).⁸ In this audit, we found that the TDR data was inaccurate and unreliable, and FAS contracting personnel were not using the data to negotiate or make pricing determinations. We also found that those FAS contracting personnel with access to TDR data lacked a basic understanding of it and did not know how to use it.

FAS's Use of the 4P Tool on Contract and Option Awards Often Results in Noncompliant Price Determinations (June 27, 2022).⁹ In this audit, we found that FAS contracting personnel used flawed methodologies and practices when performing analyses with the 4P tool. In doing so, FAS contracting personnel:

- Improperly relied on the 4P tool to establish price reasonableness without conducting additional price analysis;
- Awarded proposed pricing based on a 4P tool comparison to the current pricing on the same contract (self-hits);

⁷ Report Number A140143/Q/T/P18004.

⁸ Report Number A140143/Q/6/P21002.

⁹ Report Number A201045/Q/3/P22001.

- Awarded proposed pricing based on a 4P tool comparison to other government pricing, despite the 4P tool identifying better commercial pricing; and
- Awarded pricing that either exceeded the market thresholds established by the 4P tool or for which the 4P tool found no market research comparisons, without any further justification or analysis.

We also found that FAS contracting personnel rely on the 4P tool although it often contains outdated or inaccurate pricing data that could skew price analysis results.

GSA’s Fiscal Year 2020 Transactional Data Reporting Pilot Evaluation Provides an Inaccurate Assessment of the Program (May 1, 2023).¹⁰ In this audit, we found that the data collected through the TDR pilot program has never been used to analyze and negotiate contract-level pricing. Instead, GSA has amassed a collection of data that is almost entirely inaccurate, unreliable, and unusable. Specifically, Fiscal Year 2022 TDR data for product sales could not be used for meaningful price analysis because it lacked essential information, such as standardized part numbers or descriptions that identify the services provided. In many cases, contractors are not reporting accurate part numbers and are reporting identical products in a myriad of variations.

Alert Memorandum: FAS is Expanding the Transactional Data Reporting Rule Despite a Failed Pilot Program (June 27, 2025).¹¹ In this memorandum, we explain that GSA is expanding the *TDR Rule* by making it mandatory across the entire MAS program despite, among other things, persistent data quality issues, lack of data usage for pricing decisions, and lack of price competition.

TDR and GSA Advantage! catalog data is critical to facilitating effective 4P tool price analysis, which helps FAS contracting personnel make fair and reasonable pricing determinations. It is ultimately FAS’s responsibility to ensure that the product data it collects is accurate and usable for pricing decisions. If used consistently and appropriately, accurate manufacturer part numbers promote uniformity across multiple MAS contracts and within TDR data. Part number uniformity enables the 4P tool to pinpoint more contracts offering identical products and identify the associated prices paid from the TDR data. This makes the 4P tool’s pricing results more effective and reliable for FAS contracting personnel making fair and reasonable price determinations.

¹⁰ Report Number A210081/Q/3/P23001.

¹¹ Memorandum Number A140143-4.

As GSA continues to expand TDR, and government-wide domestic procurement of common goods is consolidated to GSA, it is imperative that FAS contracting personnel have accurate and complete data, which can only occur if contractors are offering products and reporting sales with accurate manufacturer part numbers.¹²

¹² Executive Order 14240, *Eliminating Waste and Saving Taxpayer Dollars by Consolidating Procurement*, 90 Fed. Reg. 13671 (March 20, 2025).

Results

Access to accurate and consistent manufacturer names and part numbers is imperative to: (1) maximize the price analysis capability of FAS's pricing tools and (2) provide information FAS contracting personnel can use to make fair and reasonable price determinations.

However, we found inaccurate manufacturer names and part numbers for products in the GSA Advantage! catalog and TDR data, including multiple variations for the same product, as well as names and part numbers that did not match those from the manufacturer. We also found that FAS does not standardize part numbers for related product add-ons and base products with options that have a single manufacturer part number for multiple variations, which inhibits identification and comparability across MAS contracts.

Absent reliable manufacturer name and part number data, FAS's pricing tools cannot identify identical products and provide useful pricing information for contracting officers' use in negotiations, potentially resulting in higher awarded pricing. As a result, federal customer agencies may overpay for products offered on MAS contracts and waste taxpayer dollars.

Finding 1 – GSA Advantage! catalog and TDR data include inaccurate manufacturer names and part numbers for products, which impairs price analysis.

According to General Services Administration Acquisition Regulation 552.216-75(b)(2), *Transactional Data Reporting*, MAS contractors are required to submit the manufacturer name and part number with their new offer, modification, and TDR data. GSA policies require that FAS maintain the integrity of TDR data and that contracting personnel confirm the accuracy of product data before awarding new offers or approving modifications.

However, we found inaccurate manufacturer names and part numbers for products in both GSA Advantage! catalog and TDR data. These inaccuracies impair the effectiveness of FAS's price analysis techniques and are occurring because the processes and systems FAS designed to ensure accurate product data are not operating effectively.

Inaccurate Manufacturer Names and Part Numbers for Products

Identical products should have the same manufacturer names and part numbers. However, we found inaccurate manufacturer names and part numbers in FAS's GSA Advantage! catalog and TDR data, including multiple variations of manufacturer names and part numbers for the same product. For example, we found 12 different name variations for HP Inc. *Figure 2* on the next page shows examples of inaccurate manufacturer name variations.

Figure 2. Examples of Inaccurate Manufacturer Name Variations

Manufacturer Name	Name Variations		
HP Inc.	HP Inc. HPI Hewlett Packard HP GSS Notebook	HP Notebook HP GSS Standard Notebook V9 HP Lightweight Notebook HP GSS Lightweight Notebook	HP Lightweight Notebook V9 Mfr: HP Remarketed RF Direct Mfr: HPI Sourcing – New N/A
IGLOO	Igloo Igloo Inc.	Igloo Company Igloo Products	Igloo Corp*385
Gerber	Gerber Gerber Gear	Gerber Legendary Blades Gerber Knives and Tools & Gear	
Samsung Electronics Co., Ltd	Samsung Samsung IT Targus	Add-on Computer Samsung Commercial Information Sys Clearcube Technology, Inc.	Samsung Electronics America, I
Ability One	Ability One Skillcraft	AbilityOne NIB	NIB-NISH
Boise	Boise Boise Paper	Boise Cascade Paper Cascades	Cascad Office Depot

In addition, part numbers did not match the part numbers assigned by the manufacturer. We found part numbers that were reported in TDR data but not found in GSA Advantage! or our manual market research. For example, the Gerber Multi-Plier 600 DET has an assigned part number of 07400; however, in TDR, it has three different part numbers. The GSA Advantage! catalog has six different part numbers for the same product. *Figure 3* on the next page shows examples of these manufacturer part number deficiencies.

Figure 3. Manufacturer Part Number Deficiencies

Manufacturer Name	Manufacturer Description	Part Numbers		
		Manufacturer	Contractor TDR Data	GSA Advantage! Catalogs
Multiple Variations for the Same Product That Did Not Match the Manufacturer-Assigned Part Numbers				
HP Inc.	HP Elitebook 650 15.6 inch G10 Notebook PC	795Y9AV	795Y9AV 650 G10 i5	795Y9AV 7Z5F2UT#ABA 7Z4NFUT#ABA 795Z0AV GITD795Y9AV 9E1L7UC#ABA
IGLOO	IGLOO 451 400 Series Cooler	385-451	385-451 451 451 89886527	385-451 385451 451
Gerber	Gerber Multi-Plier 600 DET 07400 30-000471	07400	07400 074002EVF1 07400N	07400 7400 GB-07400 GER 07400 074002EVF1 07400 23NK58 30-000471
Samsung	FT45 Series Business Monitor F27T450FQN	F27T450FQN	F27T450FQN F27T450FQN-	F27T450FQN SY5907062 SAM_F27T450FQN F27T450FQN_DHC LF27T450FQNXGO F27T450FQN ING7YX257 G9500010 NP950XDB-KE3US-F27T450FQN-BDL
Ability One	SKILCRAFT Nature-Cycle Copy Paper, 92 Bright, 20 lb Bond Weight, 8.5 x 11, White	7530015399831	7530015399831 5399831 NSN5399831	7530015399831 NSN5399831_NSN 5399831 7530-01-539-9831 7530-01-539-9831RM
Reported in TDR But Not Found in GSA Advantage! or Our Manual Market Research				
HP Inc.	No Results	No Results	8Z645US	No Results

Again, identical products should have the same manufacturer names and part numbers. Nevertheless, multiple variations and inaccuracies of manufacturer names and part numbers continue to exist in GSA Advantage! catalog and TDR data.

Inaccurate Data Impairs the Effectiveness of Price Analysis Techniques

Inaccurate data impairs the effectiveness of FAS's price analysis techniques by preventing the 4P tool from identifying transactions and/or offerings of identical products. According to the 4P tool user guide:

- Market research supporting the 4P tool cannot be conducted if the manufacturer name and part number are invalid; and
- The 4P tool will only provide price information for identical products with the same manufacturer name and part number.

To assess the impact these data inaccuracies had on the 4P tool's effectiveness, we submitted the products we sampled to the 4P tool for pricing analysis. We found that the 4P tool returned pricing results from all available data sources for only 12 of the 52 unique part numbers we sampled (23 percent). The 4P tool found pricing from only two or fewer sources for the other 40 unique part numbers, including 9 for which no pricing results were returned, which rendered the price analysis inflated or ineffective. This further indicates that price analysis capabilities are hindered by inaccurate product data.

For example, we analyzed the 4P tool's results for the Igloo cooler shown in the third row of *Figure 3* on the previous page to determine if the 4P tool missed any offered or reported part numbers for the same product. As described below, we found that the 4P tool's median catalog and TDR prices were overstated.

- **Overstated Catalog Median Price** – We searched catalog data prices for the same product using all part number variations in *Figure 3*, calculated the median price of our results, and compared it to the catalog median price per the 4P tool. We found that the 4P tool overstated the median price by 5.3 percent, as shown in *Figure 4* below.

Figure 4. Overstated Catalog Median Price

Catalog Median Price			
Per 4P Tool	Per Audit	Overstated Amount	Percent Overstated
\$63.29	\$59.96	\$3.33	5.3

- **Overstated TDR Median Price** – The 4P tool's results returned no pricing from TDR data. This is especially concerning because we selected this part number directly from TDR data. In fact, out of the 52 part numbers we selected from TDR data, the 4P tool results did not provide any TDR pricing for 31 part numbers (60 percent of our selected sample). When we manually calculated the TDR median price using both the accurate and inaccurate manufacturer part numbers, we found that the median price was overstated by 5 percent when inaccurate part numbers were excluded, as shown in *Figure 5* below.

Figure 5. Overstated TDR Median Price

TDR Median Price			
Part Number 385-451	Part Numbers 385-451, 451, 451 89886527	Overstated Amount	Percent Overstated
\$57.01	\$54.14	\$2.87	5.0

Even in the 12 instances when the manufacturer part number was correct, the 4P tool still failed to identify all available prices in TDR data. For example, the 4P tool results for a pallet of recycled copy paper identified the TDR minimum (i.e., lowest) price of \$2,144.24 in TDR data. However, we found a lower price of \$2,100.00 for the same part number in our sampled TDR data. Since FAS ran our sample through the 4P tool in October 2024, and our TDR data was from June 2024 (within 12 months), the 4P tool should have identified the lower price, which would have reduced the TDR median price.

Taken together, these deficiencies exclude identical products from the 4P tool's price analysis that would otherwise lower median prices. They also demonstrate that MAS contractors submitted inaccurate part numbers and associated pricing that was approved by FAS contracting personnel. Absent reliable product data, effective price analysis is not possible. This could result in federal customer agencies overpaying for products offered on MAS contracts and wasting taxpayer dollars.

FAS should identify and correct existing manufacturer name and part number inconsistencies in TDR and GSA Advantage! catalog data for products to ensure that identical products use the same part numbers.

FAS's Processes and Systems Do Not Ensure Accurate Product Data

The manufacturer name and part number deficiencies occurred because the processes and systems FAS designed to ensure accurate product data are not operating effectively, as described below. Specifically:

- The TDR Data Quality Dashboard (TDR dashboard) does not address the root cause of inaccurate part numbers;
- The FCP is not completely effective for GSA Advantage! catalog data validation;
- Manual market research is inefficient and impractical;
- FAS industrial operations analysts (IOAs) do not always perform contractor assessment visits properly; and
- Voluntary controls have limited effectiveness.

The TDR dashboard does not address the root cause of inaccurate part numbers. In response to prior TDR audit reports issued by our office, FAS launched the TDR dashboard in April 2021 to allow contractors and FAS contracting personnel to identify and correct part numbers in TDR data and improve overall product data quality. The TDR dashboard compares manufacturer part numbers in reported TDR data to GSA Advantage! catalog data, determining if each TDR contractor reports the same manufacturer part number as listed in its GSA Advantage! catalog. An error between the two systems is identified as a "soft flag," causing FAS to inform the contractor of the error. However, FAS does not require contractors to correct the data. Data correction is voluntary.

The TDR dashboard does not address the root cause of the data deficiencies discussed above because FAS is merely matching inaccurate part numbers from the TDR data to the inaccurate part numbers in the GSA Advantage! catalog. Therefore, the TDR dashboard does not ensure that manufacturer part number data is accurate, reliable, or usable for price analysis.

Notwithstanding this shortcoming, the TDR dashboard could be more useful if FAS approves and awards accurate and consistent product data. That would provide the 4P tool with at least two data sources with accurate product data to use for price analysis. Therefore, FAS should develop and implement processes that ensure accurate and consistent part numbers are established upon new contract award and modification approval while continuing to improve TDR data through the TDR dashboard.

The FCP is not completely effective for GSA Advantage! catalog data validation. The FCP is an online system MAS contractors use to maintain their GSA Advantage! catalogs. Contractors use the FCP to submit the product details (e.g., part numbers) for modifications to existing contracts.¹³ One of FCP's intended functions is to help ensure MAS contractors submit accurate manufacturer part numbers and other product information in their GSA Advantage! catalogs.

According to the FCP user guide, all submitted data goes through automated accuracy checks in the Authoritative Catalog Repository, FAS's master data repository for GSA Advantage! catalog data, prior to FAS contracting personnel review. If FCP generates an error report during this validation step, it is likely due to errors in the manufacturer part number and/or name. This FCP process occurs prior to the sale of any newly offered products, and thus, it occurs prior to reporting any TDR data.

Despite these automated validations and additional reviews by FAS contracting personnel, we found errors in FAS-approved manufacturer part numbers. For example, we found a contract catalog that offered a Samsung computer monitor (Manufacturer Part Number F27T450FQN) with four different, incorrect part numbers under the same Special Item Number, as shown in *Figure 6* below.

Figure 6. Example of Awarded Incorrect Part Numbers

Manufacturer Part Number	Awarded Incorrect Part Numbers
F27T450FQN	F27T450FQN- LF27T450FQNXGO SAM_F27T450FQN SYS907062

¹³ FAS continues to move contracts to the FCP monthly. FAS also intends to open the FCP to new offers in Fiscal Year 2026.

FAS policy instructs contracting officers to be alert where a vendor proposes two or more identical commercial products. It further directs contracting officers to ensure identical products with the same terms and conditions are not awarded under the same Special Item Number.¹⁴

Manual market research is inefficient and impractical. GSA policy requires FAS contracting personnel to conduct market research to compare prices for the same or similar items when data that should be readily available is not.¹⁵ For example, if the 4P tool cannot provide pricing data for offered contract items, or if it discovers “self-hits only” (where the only results are the contractor’s own products), FAS contracting personnel must conduct manual market research, such as internet searches, to find the same product. This can be inefficient due to the high volume of contractor-offered products and unreliable internet search results.

FAS IOAs did not always perform contractor assessment visits properly. GSA’s *National Contractor Assessment Manual* prescribes that IOAs are responsible for verifying the accuracy of TDR data (when applicable). Specifically, IOAs are responsible for verifying manufacturer names and part numbers in TDR data to ensure they match the products on the approved GSA Advantage! catalog price list. However, we found that IOAs did not always assess TDR data quality.

We reviewed 20 contractor assessment reports and found that for 12 (60 percent) of them, the IOA did not assess TDR data quality by verifying the manufacturer part number. Even when they did, the IOAs could only select a small sample of invoices relative to the total number of invoices. Notwithstanding these deficiencies and limitations, IOAs are only responsible for ensuring that the manufacturer part number matches the contractor’s GSA Advantage! catalog, which is not effective if the GSA Advantage! manufacturer name and part number are inaccurate or inconsistent. FAS should also require IOAs to verify the part numbers to the manufacturer’s source information to the extent it is available.

Voluntary controls have limited effectiveness. FAS employs the Verified Products Portal (VPP) and the Report Incorrect Product Information Link (RIPIIL) tool as additional controls over manufacturer part numbers. The VPP allows manufacturers to provide accurate part numbers and other product data that supplement product listings in GSA Advantage!. The RIPIIL tool allows GSA Advantage! users to report incorrect product information. While these controls have the potential to help ensure more accurate data in GSA Advantage!, both are completely voluntary. As a result, their effectiveness is limited.

In sum, FAS does not have accurate and reliable manufacturer names and part numbers to make effective product pricing determinations. Throughout our audit, FAS contracting officers

¹⁴ FAS Policy and Procedure 2021-05, *Evaluation of Federal Supply Schedule Program Pricing* (revised July 21, 2023).

¹⁵ FAS Policy and Procedure 2021-05.

stressed the importance of this information. For example, they told us that incorrect part numbers negatively affect the efficiency and quality of their work, which is “heavily impacted” when they cannot validate the manufacturer part number. Accordingly, FAS should address these deficiencies by improving its processes that help identify and correct existing manufacturer name and part number deficiencies to ensure that identical products use the same manufacturer part numbers.

Finding 2 – FAS does not standardize part numbers for related product add-ons and base products with options that have a single manufacturer part number for multiple variations.

Some related product add-ons and base products are available in multiple variations or with different options. Related product add-ons are sold individually on GSA Advantage! and have part numbers that differ from the base product. However, the add-ons do not function unless they are used with a base product and the prices differ depending on the base product to which they are applied. Additionally, base products may be sold in several different variations such as multiple sizes, features, materials, and other selectable options.

In some cases, the manufacturer uses a single part number for all versions of the related product add-ons or base products with options even though the price varies depending on the selected options. To reflect the appropriate pricing, FAS allows MAS contractors to modify part numbers to differentiate configurations. As a result, MAS contractors are reporting different manufacturer part numbers for identical products.

According to FAS, its ability to account for part number variations depends on product complexity. Products with a single manufacturer part number but with variations from add-ons and options present significant challenges in identifying identical products across MAS contracts.

Notwithstanding these challenges, the absence of standardized part numbers for identical related product add-ons and base products with options that have a single manufacturer part number for multiple variations leads to part number variations that inhibit identification and comparability across MAS contracts. When combined with the inability of GSA Advantage! to properly account for related product add-ons and product options, this hinders FAS’s ability to conduct effective and efficient price analysis using its automated and manual pricing tools.

Manufacturer Part Numbers for Related Product Add-Ons

We found that MAS contractors reported different manufacturer part numbers for some related product add-ons when the product add-ons were applied to different base products.

For example, we examined GSA Advantage! catalog and TDR data for two-way radios (i.e., the base product) and related product add-ons. These related product add-ons have a single manufacturer part number but different prices depending on the base product to which they are applied.

Since the manufacturer does not have unique part numbers that correspond to the different prices for these products, we found that some MAS contractors either used a single manufacturer part number for all versions of the related product add-on, while other MAS contractors used a modified part number to differentiate the multiple versions and the different pricing.

For example, in *Figure 7* below, we show the different part numbering for a related product add-on for different radios. In this case, the manufacturer part number for the SmartZone related product add-on is H38, which can be added to two different base model radios, APX6000 and APX8000. While one MAS contractor uses the H38 manufacturer part number for all versions of the SmartZone add-on, the other MAS contractor used a modified part number to align it with the appropriate base radio for TDR and so GSA customers can purchase the applicable related add-on product separately and at the appropriate price.

Figure 7. Two-Way Radio Part Numbers and Pricing

Contractor	Related Product Add-On Manufacturer Part Number	Base Radio Manufacturer Part Number	Modified Related Add-On Product Part Number	Sold Price Range (Per TDR data)
Contractor A	H38	Unknown	N/A	\$973.50 – \$1,105.50
Contractor B	H38	APX6000	H38_APX6000	\$871.20 – \$930.35
Contractor B	H38	APX8000	H38_APX8000	\$704.92 – \$1,113.97

In this example, if an MAS contractor sells the “H38” related add-on product on its GSA schedule contract and uses the actual manufacturer part number for it, the 4P tool cannot determine to which base product it was applied. As a result, the output of the 4P tool’s pricing report can vary greatly or return no results at all. We submitted both modified related add-on product part numbers to the 4P tool for analysis and found that it could not find a price in TDR data or commercial market research.

Manufacturer Part Numbers for Base Products with Different Options

Base products can be offered on GSA Advantage! with different options, such as multiple sizes, features, materials, and other selectable options. In some cases, the manufacturer uses a single part number for all options although there is different pricing for each option.

To align pricing with the different options, FAS allows contractors to modify manufacturer part numbers. However, there is a lack of consistency across MAS contracts and as a result, price comparisons using the manufacturer part number have become virtually impossible.

For example, a sanding disk has a single Manufacturer Part Number 710W. However, it is manufactured in different sizes that are all priced differently. We identified three MAS

contractors that offer the 710W sanding disk. One MAS contractor uses the manufacturer's part number of 710W while the other two contractors use modified part numbers. *Figure 8* presents how one of the MAS contractors has modified the part number to align the different sizes with the associated pricing.

Figure 8. Sanding Disk Size and Price Variations

Manufacturer Part Number	Sanding Disk Diameter	Contractor's Modified Part Number	Catalog Price (\$)
710W	3 inches	710W780TH6	20.75
710W	5 inches	710W780TJ0	34.19
710W	6 inches	710W780TH7	53.04
710W	8 inches	710W780TH8	86.43

In this example, the MAS contractor submitted modified manufacturer part numbers on GSA Advantage! for each sanding disk size to account for the different pricing. However, since it does not use the same modified part number as the other contractors, and the part number does not match the part number used in the commercial market, the 4P tool would not be able to find an identical product to provide comparative pricing data.

FAS Does Not Standardize Part Numbers and GSA Advantage! Does Not Accommodate the Variability of Related Product Add-Ons and Base Products That Use a Single Manufacturer Part Number

The problems related to using multiple manufacturer part numbers for identical related product add-ons and base products with options occur because FAS does not standardize them, and because GSA Advantage! does not accommodate the variability of these products.

FAS does not standardize part numbers. FAS allows MAS contractors to modify the part numbers for these products because FAS has not developed a process to standardize the part numbers that account for variable pricing. However, FAS does not ensure consistency of the part numbers across MAS contracts. Further, FAS contracting personnel explained that there is currently no method to report part numbers in a manner that accounts for part number variability. As a result, FAS approves, and contractors report, manufacturer part numbers that are different than what other MAS contractors use for the same product. This inconsistency limits the ability of both the 4P tool/CPRP and FAS contracting personnel to reliably identify identical products to compare pricing across contracts and in the commercial marketplace.

GSA Advantage! does not accommodate the variability of related product add-ons and base products that use a single manufacturer part number. The GSA Advantage! catalog does not link related product add-ons to specific base products and lacks the capability to allow GSA customers to select different options (that are priced differently) from a base product. As a result, MAS contractors modify the manufacturer part number of the related product add-on to align it to the base product part number and assign part numbers to each individual option so contractors can list all variations in their GSA Advantage! catalogs.

These modifications to the manufacturer part number enable contractors to advertise the related product add-ons separately and properly price them when the add-ons can be purchased for multiple manufacturer base products or when the price varies based on selected options. However, these part number modifications make it more difficult, if not impossible, for the 4P tool to identify an identical product. If the modified part number is not the same as other contracts that offer the same related product add-on, then the 4P tool cannot conduct an effective and comprehensive price analysis.

As described above, FAS does not have consistent and reliable manufacturer part numbers when a manufacturer uses a single part number for related products add-ons or base products with multiple options. This occurs because FAS does not standardize part numbers; allowing contractors to modify part numbers but not ensuring consistency, and because of GSA Advantage! catalog limitations. Therefore, to enable price analysis, FAS should develop and implement processes to ensure that product variations can be identified and compared across MAS contracts.

Conclusion

Access to accurate and consistent manufacturer names and part numbers is imperative to: (1) maximize the price analysis capability of FAS's pricing tools and (2) provide information FAS contracting personnel can use to make fair and reasonable price determinations.

However, we found inaccurate manufacturer names and part numbers for products in the GSA Advantage! catalog and TDR data, including multiple variations for the same product, as well as names and part numbers that did not match those from the manufacturer. We also found that FAS does not standardize part numbers for related product add-ons and base products with options that have a single manufacturer part number for multiple variations, which inhibits identification and comparability across MAS contracts.

Absent reliable manufacturer name and part number data, FAS's pricing tools cannot identify identical products and provide useful pricing information for contracting officers' use in negotiations, potentially resulting in higher awarded pricing. As a result, federal customer agencies may overpay for products offered on MAS contracts and waste taxpayer dollars.

To address these deficiencies, FAS should develop and implement effective controls to ensure the accuracy and reliability of the manufacturer names and part numbers it collects. Among other things, FAS should improve its automated data quality checks and contractor oversight to identify and correct existing inaccuracies and prevent new inaccuracies from occurring.

FAS should also provide contracting personnel with the tools and resources necessary to support effective and efficient manual market research and ensure that they award accurate and consistent manufacturer names and part numbers. FAS should also implement effective processes to minimize manufacturer part number variations across MAS contracts and improve the accuracy and reliability of manufacturer part numbers and pricing information in GSA Advantage! catalogs.

Recommendations

We recommend that the FAS Commissioner:

1. Identify and correct existing manufacturer part number and name inconsistencies in TDR and GSA Advantage! catalog data for products to ensure that identical products use the same part numbers.
2. Develop and implement processes that ensure accurate and consistent part numbers are established upon new contract award and modification approval, while continuing to improve TDR data match rates through the *TDR Data Quality Dashboard*.

3. Improve the FAS Catalog Platform's automated data quality checks to ensure that incorrect part numbers are flagged and corrected to minimize the need for FAS contracting personnel to perform manual market research.
4. Provide FAS contracting personnel with tools, guidance, and resources that allow for efficient and effective manual market research.
5. Ensure FAS industrial operations analysts verify the accuracy of TDR data, as required, and verify whether part numbers are consistent with manufacturer sources.
6. Implement processes to ensure identical related product add-ons and base products with options that have a single manufacturer part number for multiple variations can be identified and compared.

GSA Comments

The FAS Acting Commissioner agreed with Recommendation 4 and partially agreed with Recommendations 1, 2, 3, 5, and 6. FAS's written comments are included in their entirety in **Appendix C**.

OIG Response

In her comments, the FAS Acting Commissioner states that the report does not adequately quantify or contextualize the actual impact of the identified representational inconsistencies. She states that FAS has improved product data quality and that part number variations are not necessarily evidence of inaccurate data. She further cited internal and external pricing studies that show savings compared to commercial prices. She questioned our analysis methodology and shared details of part number variations. She also stated that FAS has made substantial progress on improving data standardization, compliance, and quality, but acknowledged that further improvements need to be made.

Improvements in Product Data Quality. In the FAS Acting Commissioner's comments, she states that FAS has taken actions to improve data quality and consistency using the FCP, VPP, and other TDR modernization efforts. She states that the catalog and TDR data we analyzed from February 2024 and June 2024 and the resulting conditions we reported do not reflect FAS's current data environment.

However, during our audit, we analyzed a sample of products from FAS's modernization efforts, specifically the FCP contracts, and found that despite the additional data validation step from the *Compliance & Pricing* report, we still found inaccurate part numbers and that the 4P tool was unable to identify pricing for a significant number of the products.

For example, one sampled contract contained a contractor-submitted product file with 71,493 products. The 4P tool did not return any market research for 1,692 of those products, and

12,216 had “self-hit only” designations. Self-hits occur when the only instances FAS’s pricing tool could find of the product within the government marketplace were the contractor’s own products. As a result, pricing is not compared to pricing on other government contracts. Both situations require manual market research, which we determined is inefficient, impractical, and leaves contracts prone to product data deficiencies. In addition, the VPP remains completely voluntary which limits its usefulness.

At the conclusion of our audit, FAS informed us of the improvements incorporated into CPRP; its new pricing tool. To determine if the improvements were effective and improved upon our audit results, we ran our audit sample through CPRP. We found that it could not locate identical products and provide price comparisons because of part number inconsistencies and that the results were worse in CPRP than in the 4P tool. *Figure 9* below compares pricing results returned by CPRP versus the 4P tool for the 52 products in our audit sample.

Figure 9. Pricing Results of CPRP Versus the 4P Tool

Metric	CPRP	Percent	4P Tool	Percent
Pricing from all available sources	11 of 52	21%	12 of 52	23%
Pricing from ≤ 2 sources	41 of 52	79%	40 of 52	77%
No pricing results returned	18 of 52	35%	9 of 52	17%
No TDR pricing returned	36 of 52	69%	31 of 52	60%

As shown above, the pricing results for CPRP were worse than the 4P tool. For example, CPRP had no pricing results for 18 of the 52 products in our sample while the 4P Tool had no pricing results for only 9 products. In addition, CPRP had no TDR pricing returned for 36 of the 52 products in our sample while the 4P Tool had no TDR pricing returned for 31 of the products. We acknowledge the timing differences between these two analyses; however, the results from CPRP are not encouraging.

Standardized Data. In the FAS Acting Commissioner’s comments, she states that FAS standardizes catalog and TDR product data to group like items even when contractor-submitted manufacturer names and part numbers differ. She states that FAS does not need identical part numbers to identify like items and validate pricing accuracy. She also states that FAS does not change the contractor-submitted data or enforce a standard representation.

However, according to the CPRP user guide, “CPRP results provide market research information for identical items, i.e., products with the same manufacturer, manufacturer part number, and unit of measure.” Our audit report explains that FAS’s pricing tools do not function effectively when part numbers differ. FAS’s choice to not enforce more consistent part number representations, especially for identical, non-configurable products, leads to part number variations in a system that relies on consistent data. Our audit report demonstrates that despite the nature of FAS’s asserted sophisticated pricing tool, it is still unable to identify pricing from

one or more sources even with CPRP improvements, which limits its ability to return comprehensive and reliable pricing comparisons.

Point-In-Time Analysis. In the FAS Acting Commissioner's comments, she states that FAS employs a more complex methodology and wider scope of government contract pricing compared to our point-in-time analysis.

We disagree. Our audit analysis was not manual. While we manually and judgmentally selected our audit product sample from FAS's TDR data, we submitted the sample through FAS's automated pricing tool and identified deficiencies. A point-in-time analysis is a common and appropriate audit methodology. Further, it accurately reflects the same analysis that FAS contracting personnel use when they receive a new offer or modification and must assess the pricing offered at that point in time.

During our audit, and with FAS's assistance, we ran our audit sample through the 4P tool as if it were a new offer at that point in time and communicated the deficiencies in our audit report. At FAS's request, we provided the submission and results of our analysis so FAS could review it and received no response, questions, or concerns. Further, as discussed above, we also submitted the same audit sample through FAS's new system, CPRP, and got similar results. This demonstrates that deficiencies may exist at any point in time when FAS contracting personnel use the pricing tools to evaluate contractor pricing.

Configurable Products. In the FAS Acting Commissioner's comments, she stated that FAS's treatment of configurable products is a recognized and appropriate methodology. The comments focus on the exponential number of configurations and claim that because of the large number of possible variants and base product applications, FAS relies on negotiating a discount relationship to the list price for these products on each contract.

However, the comments are a distraction from FAS's failure to ensure comparability of identical configurable products from a single manufacturer that are available through multiple contracts. This report identifies multiple configurable products from a single manufacturer that are available from multiple contracts but use different part numbers; including both related product add-ons and base products with different options. FAS should be able to use its pricing tools to assess and compare the contract pricing since they are identical products from a single manufacturer; however, it cannot do so because it allows multiple part numbers for the same product.

GSA Advantage! Constraints. In the FAS Acting Commissioner's comments, she stated that a significant portion of the part number variations cited in our report are caused by longstanding structural constraints in GSA Advantage!. Specifically, the same manufacturer name and part number combination may not appear more than once on each contract, so the contractor appends the part number with additional information like units of measure, which are not maintained in GSA Advantage! for price comparison.

As discussed in our report, GSA Advantage!'s structural constraints contribute to inconsistent TDR and catalog data quality. Because of GSA Advantage!'s structural constraints, there are multiple part numbers for the same product which negatively affects FAS's ability to use the data for price comparisons.

Notwithstanding these constraints, many of the products with inaccurate part numbers that we identified in our report were not offered in package quantities or units of measure. Rather, they are single, non-configurable products which part numbers varied across FAS's data sources and did not match the part number assigned by the manufacturer. This further supports that, even in basic examples, FAS's processes to collect accurate product data are not completely effective and can negatively affect price analysis.

MAS Pricing. In the FAS Acting Commissioner's comments, she stated that the report does not adequately quantify the impact of the deficiencies. She stated that FAS's new pricing algorithm will result in mid-point savings of approximately \$643 million per year. During our audit, FAS did not provide support for the claimed savings; therefore, we did not review it, nor can we attest to the accuracy.

However, our report does show that part number variability and the resulting lack of comparability hinders the effectiveness of FAS's tools. In some cases, due to the lack of comparability, FAS's tools will result in overstated pricing. As shown in *Figures 4 and 5* on page 11, median prices in these examples decreased when we incorporated identical products that FAS's pricing tool failed to identify.

Recommendation 1 — Identify and correct existing manufacturer part number and name inconsistencies in TDR and GSA Advantage! catalog data for products to ensure that identical products use the same part numbers. The FAS Acting Commissioner partially agreed with this recommendation. She agreed that FAS should improve the consistency and comparability of product data but disagreed that contractor-submitted data should be uniform for identical products. As we discussed in our report, part number variations prohibit FAS's automated and manual pricing tools from finding offered and transactional prices for identical products. As stated in the *Improvements in Product Data Quality* section of our response, we submitted our sample through both the 4P tool and CPRP and found that neither was able to obtain pricing information from one or more sources in many instances. Therefore, we reaffirm Recommendation 1.

Recommendation 2 — Develop and implement processes that ensure accurate and consistent part numbers are established upon new contract award and modification approval, while continuing to improve TDR data match rates through the *TDR Data Quality Dashboard*. The FAS Acting Commissioner partially agreed with this recommendation. She agreed that FAS should continue to strengthen processes that improve data consistency at contract award, modification, and reporting. However, she attributes variations between catalogs and TDR data to the structural constraints of GSA Advantage! discussed above. While we acknowledge that MAS contractors should report the catalog part number in its TDR data, failure to address part

number variations caused by GSA Advantage! structural constraints will simply lead to more part number variations in TDR data as well. Therefore, we reaffirm Recommendation 2.

Recommendation 3 — Improve the FAS Catalog Platform’s automated data quality checks to ensure that incorrect part numbers are flagged and corrected to minimize the need for FAS contracting personnel to perform manual market research. The FAS Acting Commissioner partially agreed with this recommendation. She agreed to continue to enhance FCP’s automated data quality checks but disagreed that flagged variations require correction. Again, our audit report demonstrates that variations for identical products negatively impact the ability of FAS’s pricing tools to compare prices. We reaffirm that identical products (with no or the same unit of measure) should have the same part number. It remains FAS’s responsibility to ensure part number consistency and maximize the effectiveness of its pricing tools. Therefore, we reaffirm Recommendation 3.

Recommendation 4 — Provide FAS contracting personnel with tools, guidance, and resources that allow for efficient and effective manual market research. The FAS Acting Commissioner agreed with this recommendation.

Recommendation 5 — Ensure FAS industrial operations analysts verify the accuracy of TDR data, as required, and verify whether part numbers are consistent with manufacturer sources. The FAS Acting Commissioner partially agreed with this recommendation. She agrees that IOAs should verify the accuracy of TDR data but does not fully agree that verifying part numbers against manufacturer sources is appropriate in all cases. This recommendation would provide an additional level of review to identify part number variations of identical products across MAS contracts. Therefore, we reaffirm Recommendation 5.

Recommendation 6 — Implement processes to ensure identical related product add-ons and base products with options that have a single manufacturer part number for multiple variations can be identified and compared. The FAS Acting Commissioner partially agreed with this finding. She agreed that related product add-ons and configurable products warrant a more structured approach that supports automated price analysis but disagreed with standardizing part numbers for all product add-ons and options.

Recommendation 6 in our report does not recommend that FAS standardize product part numbers. Rather, it recommends that FAS determine and implement processes to identify and compare related product add-ons and base products with options that have single manufacturer part number. Therefore, we reaffirm Recommendation 6.

Appendix A – Objective, Scope, and Methodology

Objective

This audit was included in our *Fiscal Year 2024 Audit Plan*. Our audit objective was to determine if GSA's systems and processes ensure transactional data submitted by the contractor and the contractor's product catalog contains actual manufacturer part numbers in accordance with applicable regulations and GSA policies.

Scope and Methodology

Our audit scope included examining FAS's controls over contractor-submitted TDR and GSA Advantage! catalog data for the 2 months February 2024 and June 2024.

To accomplish our objective, we:

- Reviewed relevant background documentation regarding TDR, including Federal Register, Vol. 81, No. 121 (June 23, 2016);
- Reviewed prior GSA Office of Inspector General audit reports and memorandums related to TDR;
- Reviewed applicable criteria, including Federal Acquisition Regulation and General Services Administration Acquisition Regulation clauses, a GSA FAS Procurement Information Notice, and FAS data systems user guides, to determine requirements for submitting, verifying, and maintaining accurate manufacturer part numbers;
- Reviewed flowcharts and held discussions with FAS officials to understand how FAS's data systems interact and how part numbers affect the 4P tool's output;
- Reviewed TDR data from February 2024 and June 2024 to determine top-selling products for sample selection;
- Examined a judgmental sample of 52 unique part numbers totaling \$19.1 million reported in TDR data from February 2024 and June 2024;
- Compared sampled part numbers from TDR data to part numbers in the respective contractors' GSA Advantage! catalogs and manufacturer sources;
- Researched sampled part numbers on GSA Advantage! to determine if contractors modified part numbers in their catalogs;
- Submitted sampled products to PPAPI and examined the resulting 4P tool's analysis to determine the adequacy of its market research relative to finding identical products;
- Examined part numbers for sampled products under FCP contracts to determine if the FCP improves part number accuracy;
- Examined products from manufacturers that participated in VPP to determine if VPP improves part number accuracy in TDR and GSA Advantage! data;
- Examined a RIPIL tool report from February 2024 to determine if users report incorrect part numbers and FAS corrects the errors;

- Reviewed 20 contractor assessment reports of contracts from all our sampled products to determine if the IOAs verified TDR data accuracy;
- Interviewed FAS contracting personnel to gain an understanding of how part numbers are used, and what challenges they face with awarding contract pricing; and
- Interviewed FAS officials to: (1) gain an understanding of the controls in place that ensure accurate manufacturer part numbers in transactional data and (2) gain access to FAS data systems.

Data Reliability

We assessed the reliability of TDR data from February 2024 and June 2024. FAS pulled the data for both months directly from the Sales Reporting Portal. TDR data is raw data input by participating MAS contractors and cannot be reconciled to another database. As a result, we directly observed FAS pulling the data from the Sales Reporting Portal in real time and providing it to us to ensure that it was unaltered. Although TDR data was unreliable for fair and reasonable price determinations, as discussed in this report, it was reliable for the purposes of our examination.

To assess the reliability of GSA Advantage! catalog data, we directly queried product listings on the GSA Advantage! website. Although GSA Advantage! catalog data was unreliable for fair and reasonable price determinations, as discussed in this report, it was reliable for the purposes of our examination.

Sampling

To analyze manufacturer part numbers, we selected a judgmental sample of 16 products based on product descriptions, totaling \$18 million in reported sales, from the three top-selling product Special Item Numbers under the TDR pilot from February 2024 and June 2024.¹⁶ We selected products from the following Special Item Numbers: 33411 – *Purchasing of New Electronic Equipment*; 339940OS4 – *Office Products and Supplies*; and 332510C – *Hardware Store, Home Improvement Center, Industrial or General Supply Store, or Industrial Maintenance Repair and Operations (MRO) Distributor*.

For one sampled product (i.e., two-way radios), we selected a judgmental sample of 12 (16 percent) of 76 unique part numbers. This was due to the extensive list of unique part numbers under that product. For the remaining 15 products, we examined all 40 unique part numbers. We examined these sampled products to determine if the part numbers in the TDR and GSA Advantage! catalog data were actual manufacturer part numbers.

¹⁶ The “description deliverable” is a general description of a product group in the TDR data that includes multiple part numbers. We initially selected our sample from the “description deliverable” because it represented the top type of products reported in the TDR data.

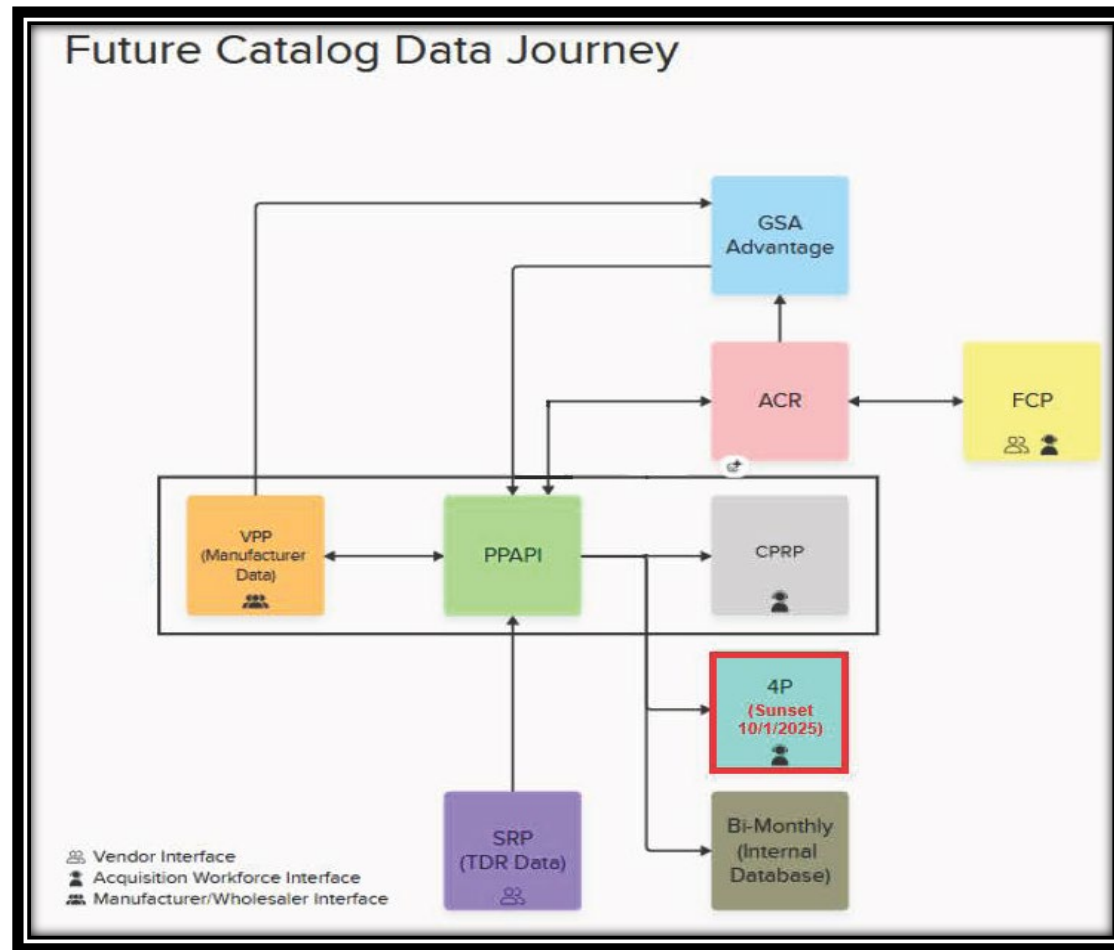
Internal Controls

We assessed internal controls significant within the context of our audit objective against internal control guidance for federal agencies. The methodology above describes the scope of our assessment, and the report findings include any internal control deficiencies we identified. Our assessment is not intended to provide assurance on GSA's internal control structure as a whole. GSA management is responsible for establishing and maintaining internal controls.

Compliance Statement

We conducted the audit between March 2024 and March 2025 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 objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Appendix B – Product Data System Descriptions



4P = Price Point Plus Portal (4P tool)
 ACR = Authoritative Catalog Repository
 CPRP = Compliance and Pricing Reporting Portal

FCP = FAS Catalog Platform
 PPAPI = Price Point API
 SRP = Sales Reporting Portal

VPP = Verified Products Portal

Appendix C – GSA Comments

DocuSign Envelope ID: 11EC64E1-5C31-8269-8204-289F0CEC357D



U.S. General Services Administration

July 1, 2026

MEMORANDUM FOR: Arthur Maisano
Regional Inspector General for Auditing
Northeast and Caribbean Region Audit Office (JA-2)

FROM: Laura Stanton
Acting Commissioner
Federal Acquisition Service (F)

SUBJECT: Response to Draft Report: *The Processes FAS Uses to Ensure It Awards and Collects Accurate Product Data Are Ineffective* Assignment Number A240054

Redesigned by:

Laura Stanton

REDESIGNED BY:

Thank you for the opportunity to comment on the referenced draft report *The Processes FAS Uses to Ensure It Awards and Collects Accurate Product Data Are Ineffective* Report Number A240054, dated June 10, 2026. The Federal Acquisition Service (FAS) response to the recommendations is below.

FAS has made substantial progress on improving data standardization and compliance, and will continue improvements in product data quality. There continues to be opportunities through additional/new technology to strengthen our current work. The title should reflect that FAS has continued work to build on the effectiveness we currently provide. FAS proposes the following more accurate title: *FAS Should Improve Its Processes to Ensure It Awards and Collects Accurate Product Data*.

The following information provides additional context regarding the operational impact of the identified inconsistencies, the improvements already implemented, and the pricing methodologies currently employed, which provides a more complete picture of program performance.

MAS pricing delivers substantial savings to customer agencies. Both internal and external analyses have confirmed that Multiple Award Schedule (MAS) transaction pricing represents considerable savings relative to the commercial marketplace¹. FAS anticipates that its recent pricing algorithm update, FAS Pricing 2.0, will result in further mid-point savings of approximately \$643 million per year. When viewed against the full scope and demonstrated

¹See Naval Postgraduate School, Dudley Knox Library "Amazon business and GSA Advantage: a comparative analysis." <http://hdl.handle.net/10945/58451>

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

performance of the program, the report does not adequately quantify or contextualize the actual impact of the identified representational inconsistencies.

FAS has taken action to improve product data quality and consistency. FAS has taken substantive actions to improve data quality and consistency including through the FAS Catalog Platform (FCP), transactional data reporting (TDR) modernization, various catalog data quality initiatives, catalog validation enhancements, and pricing analytics capabilities. FAS launched the Verified Products Portal (VPP) and has obtained high-quality product data for a substantial and growing population of nearly 20 million items. This data augments vendor-submitted data and displays on GSA Advantage! to improve the customer experience through consistent and reliable product attribute data. The OIG reviewed catalog and TDR data from February 2024 to June 2024. Since that time, FAS has made multiple improvements to its systems, processes, and controls. As a result, several of the conditions described in the report do not reflect the current state of FAS's product data environment.

FAS appreciates the feedback provided by the OIG and has implemented, or is implementing, further controls to mitigate the identified concerns; however, FAS wishes to provide clarification on several key matters.

1. **FAS standardizes both catalog and TDR data for price analysis.** FAS standardizes both catalog and TDR data as part of the Compliance & Pricing market research report for comparison purposes and groups like items even when contractor-submitted manufacturer names and part numbers differ. FAS does not change contractor-submitted values or enforce a single standard representation. The fact that FAS does not enforce a single representation does not mean that FAS is unable to standardize data for comparison.
2. **FAS's pricing information is accurate.** FAS is able to identify "like" items and validate pricing accuracy, despite varying product representations, through its standardization capabilities as part of the Compliance & Pricing market research report. FAS also employs a broader, more complex methodology that incorporates a wider scope of government contract pricing, compared to the manual, point-in-time analysis done by the OIG in the report.
3. **FAS's treatment of configurable products is a recognized and appropriate methodology.** The number of possible variants for highly configurable products is governed by factorial expansion, and a single configurable product can have an extraordinarily large number of possible variants when accounting for size, configuration, materials, finishes, and accessories. It is not feasible for any person to manually review each variant to conduct price analysis. As a result, FAS has historically relied on a discount relationship to the list price, which is a recognized and appropriate methodology. FAS is reviewing its product data schema relative to the commercial marketplace, including how to represent highly configurable products in a structured manner that supports automated price analysis.

4. **Much of the observed part number variation reflects accurate data.** A significant portion of the part number variation cited in the report results from a longstanding structural constraint in *GSA Advantage!*: the same manufacturer name and part number combination may not appear more than once. Many products retain a single manufacturer part number but are distributed in varying package quantities or units of measure. To list distinct offerings of the same item, contractors commonly append the unit of measure as a suffix (e.g., 86700CT or 86700PL) to satisfy the uniqueness requirement. This is not evidence of inaccurate data. GSA recognizes this uniqueness constraint as a known limitation and has prioritized its resolution within the FAS catalog modernization roadmap. Rather than invest in significant modifications to legacy components such as the Schedules Input Program (SIP), EDI 832, and the underlying *GSA Advantage!* Architecture, GSA intends to address the constraint within its modern-built Authoritative Catalog Repository (ACR).

OIG Recommendation 001

Identify and correct existing manufacturer part number and name inconsistencies in TDR and GSA Advantage! Catalog data for products to ensure that identical products use the same part numbers.

Partially concur. FAS supports improving the consistency and comparability of product data and is actively doing so through VPP, catalog data quality initiatives, and catalog validation enhancements. FAS does not agree, however, that all contractor-submitted manufacturer names and part numbers can or should be uniformly changed to a single value under the current GSA Advantage! structure, given the uniqueness constraint and the legitimate need to distinguish package quantities and units of measure. FAS already standardizes catalog and TDR data for comparison purposes and will continue to expand standardized, FAS-provided representations as part of its catalog data quality initiatives.

OIG Recommendation 002

Develop and implement processes that ensure accurate and consistent part numbers are established upon new contract award and modification approval, while continuing to improve TDR data match rates through the TDR Data Quality Dashboard.

Partially concur. FAS will continue to strengthen processes that improve data consistency at contract award, modification, and reporting, and will continue improving TDR data match rates through TDR data quality initiatives, including the TDR Data Quality Dashboard, as well as broader TDR modernization efforts. FAS notes that variation between catalog and TDR representations is driven in significant part by structural constraints in GSA Advantage! and by contractors' commercial ordering systems, which permit duplicate manufacturer names and part numbers.

OIG Recommendation 003

Improve the FAS Catalog Platform's automated data quality checks to ensure that incorrect part numbers are flagged and corrected to minimize the need for FAS contracting personnel to perform manual market research.

Partially concur. FAS will continue to enhance the FCP's automated data quality checks and data enrichment, building on catalog validation enhancements already implemented and through the substantial product data obtained through VPP. FAS does not agree, however, that all flagged variations reflect incorrect part numbers requiring correction; effective checks must distinguish between genuine inaccuracies and legitimate variations driven by units of measure, package quantities, and configurable-product options, rather than treating all variation as error.

OIG Recommendation 004

Provide FAS contracting personnel with tools, guidance, and resources that allow for efficient and effective manual market research.

Concur. In support of FAS's expanding price analytics capabilities, FAS will continue to improve the tools, guidance, and resources available to its MAS contracting personnel.

OIG Recommendation 005

Ensure FAS industrial operations analysts verify the accuracy of TDR data, as required, and verify whether part numbers are consistent with manufacturer sources.

Partially concur. FAS agrees that TDR data accuracy is important and will ensure industrial operations analysts (IOAs) verify the accuracy of TDR data, as appropriate. FAS does not fully agree, however, that verifying part numbers against manufacturer sources is appropriate or meaningful in all cases. Any verification approach must account for legitimate representational differences caused by the GSA Advantage! uniqueness constraint, unit-of-measure suffixes, packaging distinctions, and configurable-product structures, so that valid variations are not mischaracterized as inaccuracies.

OIG Recommendation 006

Implement processes to efficiently and effectively approve and collect standardized product part numbers and develop GSA Advantage! functionality that allows the part numbers and pricing of related product add-ons and product options to be accurately represented in GSA Advantage! catalogs.

Partially concur. FAS agrees that related product add-ons and configurable products warrant a more structured approach and is reviewing its schema relative to the commercial marketplace to handle these products in a structured way that supports automated price analysis. FAS notes, however, that the inherent factorial expansion (e.g. multi-nested options, or a product option only exists by first selecting another option, etc) of configurable products makes complete, manual comparison infeasible, and that structured schema improvements — informed by VPP and other catalog data quality initiatives — are the appropriate path forward rather than a presumption that all such variation can be standardized to a single comparable part number. There is no industry-wide standard across categories for comparable part numbers based on the product options, and FAS is planning discovery for how to approach this across all GSA product categories.

Upon issuance of the final audit report, FAS will establish a Corrective Action Plan outlining the specific actions needed to execute the plan and the timeline of those actions.

Thank you for the opportunity to review this draft report. If you have any questions, please contact Jeffrey Calhoun from the Office of Acquisition Solution Development at jeffery.calhoun@gsa.gov.

Appendix D – Report Distribution

GSA Administrator (A)

GSA Deputy Administrator (AD)

Acting Commissioner (Q)

Acting Director TTS (Q2)

Chief of Staff (Q)

Supervisory Procurement Analyst (FBA)

Chief Financial Officer (B)

Office of Audit Management and Accountability (BA)

Acting Deputy Chief Financial Officer (B)

Audit Management Division (BPA)

Assistant Inspector General for Auditing (JA)

Deputy Assistant Inspector General for Acquisition Audits (JA)

Deputy Assistant Inspector General for Real Property Audits (JA)

Director (JAO)



CONTACT US

For more information about the GSA OIG, please visit us online at www.gsaig.gov.

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

1800 F Street, NW

Washington, DC 20405

Email: oig_publicaffairs@gsaig.gov

Phone: (202) 501-0450 (General)

(202) 273-7320 (Press Inquiries)

GSA OIG Hotline

To report allegations of fraud, waste, abuse, mismanagement, or misrepresentations affiliated with GSA, please submit information to our hotline, www.gsaig.gov/hotline, or call (800) 424-5210.

Follow us:



[gsa-oig](#)



[gsa_oig](#)



[@gsa-oig](#)



[gsa-oig](#)
