

ALERT

GSA Announces Expansion of “Transactional Data Reporting” Program, Reducing Compliance Obligations for GSA Schedule Contractors

June 18, 2025

WHAT: The U.S. General Services Administration (GSA) recently announced its planned expansion of the Transactional Data Reporting (TDR) program, which will make TDR mandatory for GSA Schedule contractors whose contracts include any one of 62 special item numbers (SINs). This change will significantly expand the universe of GSA Schedule contractors that are subject to TDR, and in the process eliminate the requirement for those Schedule contractors to comply with the Commercial Sales Practices (CSP) disclosure and Price Reductions Clause (PRC). In exchange, Schedule contractors will be required to provide GSA with detailed monthly reports on order-level discounts granted on individual GSA Schedule sales, which GSA can use to request additional discounts at the Schedule level.

WHEN: On June 9, 2025, GSA announced its planned expansion of the TDR Program, which will be formally issued in late June 2025 through “Refresh 27” of the GSA Schedule Solicitation, as well as an accompanying Mass Modification.

According to GSA’s June 9 notice, the obligation to capture TDR data will take effect at the beginning of the next sales reporting quarter (e.g., October 1, January 1, April 1, or July 1) after execution of the TDR modification. PRC liability will end on the same date.

GSA has requested comments on the proposed changes within 10 business days of its June 9 announcement (i.e., by June 23, 2025).

Authors

Kevin J. Maynard
Partner
202.719.3143
kmaynard@wiley.law
Vaibhavi Patria
Associate
202.719.4667
vpatria@wiley.law

Practice Areas

Government Contracts
GSA Schedule and Commercial Item
Contracts

WHAT IT MEANS FOR INDUSTRY: As discussed in a prior alert, GSA’s TDR program began as a pilot nearly 10 years ago, as part of GSA’s Category Management Initiative. The goal of the program was to drive down prices by providing GSA with greater visibility into the actual transaction-level prices and discounts given to government customers at the individual order level. Because GSA did not have access to this data, the TDR program turned to Schedule holders to collect and report this information on a monthly basis. To incentivize Schedule holders to participate in the program, GSA agreed to eliminate the requirement for TDR participants to submit CSPs and to monitor for price reductions under the PRC.

Under the initial TDR pilot, only certain SINs were eligible to participate in the TDR program. In addition, participation in TDR was optional, even for Schedule holders whose contract included one of the eligible SINs.

In 2021, GSA approved the TDR for expansion – despite blistering criticism from GSA’s Office of Inspector General (OIG), which expressed the view that TDR was not meeting its intended purpose of “improving taxpayer value” and therefore recommended that GSA develop an “exit strategy” to end the TDR pilot, as discussed in a prior alert. In July 2024, GSA announced that it was expanding the TDR pilot to include 67 additional SINs on an optional basis. Now, as noted in its June 9 announcement, GSA has ended the TDR “pilot” phase, and is expanding TDR across 62 additional SINs, including cloud services:

Category

Remaining Products SINs Recommended for Expansion (*Previously Non-TDR eligible, 62)

Facilities

332311P, 332312, 332311, 321991, 332321

Furniture & Furnishings

339113H, 33721T, 33721SBSA, 33721P, 337215SBSA, 337215MSB, 337127TLNB, 337127LFSB, 337127INT, , 337127CISB, 337127CFB, 337122SBSA, 337121P, 337121H,, 337127, 33721, 33712, 337127CF, 337127CI, 337215M,

Industrial Products & Services

3331SBSA, 811310, 333924, 333923, 333120,

Information Technology

541519PKI, 541519PIV, 541519ICAM, 541519CSP, 518210C

Office Management

561499M, 532420LTOP, 532420LT, 532420C, , 333316M, 333316F,, 333316C, 333249, 333244,

Security and Protection

334290PACS, 334290L, 336992, 336413, 334290, 334220, 334118, 812910, 334519, 333314NV, 332999S,

Transportation & Logistics Services

3361V, 3361E, 336612, 336212, 336211, 33611, 3361

Consistent with the current TDR pilot, GSA’s guidance instructs that if a Schedule includes any one of the covered SINs, the entire Schedule will be subject to TDR. However, in a departure from the TDR pilot, participation in TDR will no longer be optional, but instead will become mandatory for all Schedule contracts that include one of the covered SINs. GSA has also announced that the remaining SINs not covered by Refresh 27 or not already in TDR will become mandatory TDR SINs in a future Refresh.

The actual impact of TDR on GSA Schedule contractors still remains to be seen. On the one hand, expansion of the program promises to relieve Schedule holders of the compliance obligations associated with CSP disclosures and PRC monitoring and reporting – obligations that have frequently resulted in audit findings as well as significant settlements under the False Claims Act (FCA). On the other hand, TDR imposes more detailed reporting of discounts at the transaction level (i.e., individual orders versus total sales), on a more frequent basis (i.e., monthly versus quarterly). And, Schedule holders could face increased pressure to pass along order-level discounts reflected in TDR data (which previously did not trigger price reductions under the PRC), particularly given the current, well-publicized demands by GSA and DOGE for contractors to cut costs.