The following questions and answers are summarized from the Advance Notice Webinar for MAS Solicitation Refresh #34. The webinar was hosted by GSA on Monday October 26, 2026.

Question	Answer
GSAR 538	
As part of GSAR Part 538 FSS Program Modernizing through “evergreen contracting,” once a contractor’s Schedule hits the 20-year mark, will they be required to re-certify their business size to maintain the validity of their Schedule?	No changes are planned to FAR clause 52.219-28, Postaward Small Business Program Rerepresentation. We anticipate its existing size rerepresentation requirements will continue to apply to option periods, including those extending a Schedule contract beyond 20 years.
What will happen to any streamlined offers that have already been submitted?	Streamlined follow-on offers already submitted will continue to be processed as we work to implement changes to the MAS Solicitation. Vendors should continue to follow the current streamlined follow-on process until updated requirements take effect.
For contractors who have already transitioned into FCP and are nearing the end of their 20-year term, how should they prepare in light of the new Evergreen clause? Is GSA's plan to advise the submission of streamlined offers for the foreseeable future until systems like FCP/eLibrary/etc. can be updated for this new Evergreen duration?	Contractors nearing the end of their 20-year term, including those already transitioned to FCP, should continue preparing and submitting streamlined follow-on offers under the current MAS Solicitation requirements to avoid a lapse in contract coverage. GSA plans to continue using this process while implementing the new Evergreen contract procedures and the supporting updates to FCP, eLibrary, and other systems. GSA will provide additional guidance as revised procedures become available.
Will option renewals still be every 5 years?	Under the MAS Program, the intent is to continue to evaluate option renewals every five years. The revised language "up to an additional 5 year period" at GSAR Clause 552.238-116 is intended to provide flexibility should a shorter time period be necessary for some unique reason. GSA will provide additional guidance as revised procedures become available.
Will removal of the 20-year limitation impact the renewal process at all?	GSA is still working through the details of evergreen contracting implementation, including how legacy contract numbers will be handled, and will share more information as it becomes available. In the meantime, GSA will continue to use the streamlined follow-on process for all eligible contractors.

Will contracts with the old number system, "GS-XXF-XXXXX" receive a new contract number or continue as awarded?	GSA is still working through the details of evergreen contracting implementation, including how legacy contract numbers will be handled, and will share more information as it becomes available. In the meantime, GSA will continue to use the streamlined follow-on process for all eligible contractors.
With the removal of the 20-year limitation on contract duration, can you confirm that contractors currently in their final 5-year option on GSA MAS will not need to request a new contract and will be extended past the previous 20-year contract end date on their current contract?	GSA is still finalizing evergreen contracting implementation details. Until further notice, existing streamlined follow-on procedures remain in effect. Contractors nearing the end of their 20-year term should continue preparing and submitting streamlined follow-on offers under current MAS Solicitation requirements to avoid a lapse in contract coverage.
So there is no longer an "Ultimate Contract End Date"?	GSA is still working through the details of evergreen contracting implementation and will share more information as it becomes available. In the meantime, GSA will continue to use the streamlined follow-on process for all eligible contractors.
VA Schedule Contracts recently made changes to match the GSA MAS period of performance of 5-year base with 3 5-year options. Do you know if they will follow in removing the 20-year limitation?	GSA is still working through the details of evergreen contracting implementation. GSA intends to collaborate closely with the VA FSS team and will share additional information as it becomes available.
I apologize if this was already stated (I came late)-- once the 20 year limitation has been removed will Streamlined Offers still be an option if a contractor rather get a brand new contract?	GSA is still finalizing evergreen contracting implementation details. Until further notice, existing streamlined follow-on procedures remain in effect. Contractors nearing the end of their 20-year term should continue preparing and submitting streamlined follow-on offers under current MAS Solicitation requirements to avoid a lapse in contract coverage.
Does this mean the Temporary Price reductions will no longer require mod?	No immediate changes to the temporary price reduction modification process are currently planned. GSA continues to evaluate flexibilities and process improvements available under the Revolutionary FAR Overhaul (RFO) and will share additional information as it becomes available.
Will the 20-year limitation remove the necessity of streamlines?	GSA is still working through the details of evergreen contracting implementation and will share more information as it becomes available. In the meantime, we will continue to use the streamlined follow-on process for all eligible contractors.

With the removal of GSAR clause 552.538-81, Price Reductions, may contractors now utilize their GSA MAS labor categories and rates, discounted or otherwise, on contracts unrelated to the GSA MAS program, whether commercial or non-commercial in nature, without incurring the risk that GSA would pursue a price reduction upon identifying lower rates for comparable labor categories offered under separate contractual arrangements?	MAS contractors transitioning to Transactional Data Reporting (TDR) already move to an alternate version of the Price Reductions clause that does not include the Basis of Award relationship or associated price reduction tracking requirements. Offering lower rates under separate commercial or non-MAS government contracts does not trigger a corresponding MAS price reduction under that clause.
If contractors are in year 16 of 20, do you recommend they prepare and submit a streamlined follow-on offer, or is it expected that the new Evergreen contract procedure be in place before the contract term ends?	GSA is still finalizing evergreen contracting implementation details. Until further notice, contractors should continue following current streamlined follow-on procedures and applicable submission timelines, using their existing contract end dates for planning.
GSAR 539	
Re 552.239-7001, Is there guidance or will there be guidance on determining whether something is incidental/ancillary? Or additional guidance on how to determine whether the clause applies to a contractor's offerings such that it needs to implement the actions required by the clause?	Paragraph (a)(1) of GSAR 552.239-7001 sets out when the clause applies. Under (a)(1)(i), it applies only to the extent the Government is procuring an LLM or similar system where LLM functionality is a material feature and Government Data will be submitted directly to or produced by the LLM. Paragraph (a)(1)(ii) provides exceptions for qualifying internal contractor tools and incidental or ancillary functionality. Questions about a specific product, service, or use should be directed to the ordering activity.
Covered Nitrile Gloves	
Has GSA determined if AbilityOne nitrile gloves meeting the mil spec and color will need to be removed from GSA Schedule?	GSA continues to work with OMB and DHS on the transition plan, including its impact on AbilityOne nitrile gloves offered under the Schedule. GSA will directly engage with impacted contractors, including any removal requirements, as they become available.
FSS Domestic End Product Certification	

Does DEP certification require a modification action?	Contractors must accept the Refresh 34 mass modification to incorporate the clause into the contract. To certify products as FSS DEP, you must complete a Product Descriptive Change modification to add the Product Info code of "US" to the line item. In FCP, associate the modification with a Product Change Action and then load a Product File containing the line items with the new "US" Product Info Code. For SIP/EDI catalogs, submit the modification and, once approved, update the line items with the new code.
For this new DEP process, what is the definition of "commercially reasonable due diligience"?	The clause does not define “commercially reasonable due diligence.” The term should be understood according to its plain meaning.
For the FSS End Product do COTS items fall into the same 75% of all costs of the components?	Yes, COTS items must meet the definitions outlined in GSAR clause 552.238-130 paragraph (a) to be a FSS Domestic End Product.
Other	
Will recent presidential memorandums/proclamations regarding Canadian end products affect MAS policy?	GSA continues to work with OMB on implementation of the Presidential actions concerning Canadian end products, including any impact to the MAS program. We will share additional details as they become available.
What are the extra requirements for the 561210 FAC SIN? Proof of insurance? Fire Safety Certification? Thanks.	The 561210FAC SIN has specific requirements based on the services offered. Offerors providing complete facilities maintenance services must submit technical responses demonstrating their ability to perform the three primary tasks required for complete facilities maintenance. Offerors providing fire alarm or elevator and escalator services must submit the applicable licenses and certifications required by the solicitation. Additionally, offerors must comply with FAR 52.228-5, Insurance—Work on a Government Installation, and GSAR 552.228-5, Government as Additional Insured. Contractors must obtain and maintain the required insurance at their own expense, submit copies of their insurance documents as part of their offer, and provide updated documentation to the Contracting Officer upon expiration of the existing insurance.

	Offerors and contractors should refer to the applicable Large Category SIN instructions for additional details regarding requirements.
Did I hear correctly that Refresh 34 is expected to be delayed a week beyond November 6?	Yes, it will be delayed by one week. We plan to issue on November 12, 2026. This will enable GSA to ensure a smooth transition to a new MAS systems support contractor.
Will contractors that currently offer services under the HVAC maintenance subgroup be grandfathered in and allowed to continue to offer services under SIN 561210FAC?	Refresh 34 will eliminate HVAC maintenance services as a standalone offering and remove the subgroup "HVAC Maintenance: Boilers, Chillers, Refrigeration, etc." in its entirety. Contractors currently offering these services under this subgroup will not be grandfathered in. Existing contracts offering HVAC maintenance as a standalone service will be evaluated at the next option period. GSA will assess compliance with the revised SIN requirements, including the sales criteria in GSAR 552.238-194, Sales Criteria (formerly I-FSS-639). New offers and subsequent offers proposing HVAC maintenance as a standalone service will be rejected.
Is it an automatic transition from IR to IHEM?	No, this is not an automatic transition. Contractors that do not currently hold the Incident Handling and Event Management (IHEM) subgroup may assess their eligibility and, if eligible, request placement in the IHEM subgroup, which incorporates full Incident Response capabilities.
Will there be additional Orals for the transition?	Oral technical evaluations are not mandatory for the transition from the IR subgroup to the IHEM subgroup. An oral technical evaluation is required only if a vendor elects to add the optional IHEM subgroup. Vendors are not required to add the IHEM subgroup to remain on the HACS SIN.