

CLIENT ALERT

GSA Schedule Prices No Longer Presumed Reasonable at DoD

Apr.07.2014

On March 13, 2014, DoD issued a class deviation to FAR 8.404(d) that could make orders under GSA Schedule contracts more burdensome for both contractors and DoD, directing that contracting officers can no longer rely upon GSA's determination of price reasonableness and must instead conduct their own price analysis using the techniques in FAR 15.404-1. When the award is not competitive, those price analysis techniques could include evaluation of prices charged in similar sales or, if it is the only means to determine that the price is reasonable, could even include obtaining cost data to support the pricing of these commercial contracts.

For more information, please contact the professional(s) listed below, or your regular Crowell & Moring contact.

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