

CLIENT ALERT

Wake-up Call: GSA Launches Requirement for Schedule Contractors to Reaffirm TAA Compliance

May.06.2016

Concerned with repeated instances of FOIA requests and congressional inquiries exposing contractors offering products not compliant with the Trade Agreements Act on their Federal Supply Schedule contracts, on May 5, 2016, GSA began notifying several contractors that, *within five business days*, they would need to provide certification that products offered were TAA-compliant or remove them from their offering. The breadth of this initiative continues to unfold, but it serves as a caution for contractors to reevaluate their supply chain and the manner in which they offer products on their FSS contracts under the complex “substantial transformation” rules for establishing country-of-origin under the TAA.

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

Alan W. H. Gourley

Partner – Washington, D.C.

Phone: +1 202.624.2561

Email: agourley@crowell.com

Adelicia R. Cliffe

Partner – Washington, D.C.

Phone: +1 202.624.2816

Email: acliffe@crowell.com

M. Yuan Zhou

Counsel – Washington, D.C.

Phone: +1 202.624.2666

Email: yzhou@crowell.com