



# US DEPARTMENT OF VETERANS AFFAIRS **OFFICE OF INSPECTOR GENERAL**

Office of Audits and Evaluations

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## **OFFICE OF ACQUISITION, LOGISTICS, AND CONSTRUCTION**

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# **A Summary of OIG Preaward Contract Reports Issued in Fiscal Year 2024 on VA Federal Supply Schedule Nonpharmaceutical Proposals**

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## Executive Summary

The VA Office of Inspector General (OIG) reviews proposals submitted to the VA National Acquisition Center for Federal Supply Schedule (FSS) contracts.<sup>1</sup> Specifically, the OIG examines individual proposals submitted by commercial contractors for FSS contracts

- with an anticipated annual value of \$3 million or more,
- with an anticipated annual value of \$500,000 or more for dealers or resellers without significant sales to the general public, and
- where VA has requested OIG review.

The OIG's oversight work helps VA contracting officers negotiate fair and reasonable prices for the government and taxpayers.<sup>2</sup> Contracting officers can use OIG price recommendations on submitted proposals to help negotiate better prices; however, there is no guarantee that the government will receive the price recommended by the OIG. The resulting OIG reports on the individual proposals are not published because they contain proprietary commercial information protected from release under federal law.<sup>3</sup>

To promote transparency, this report summarizes the 22 preaward reports provided to VA contracting officers by the OIG during fiscal year (FY) 2024 on nonpharmaceutical FSS proposals. Altogether, these reports covered four supply schedules, had a cumulative estimated contract value of approximately \$1.8 billion, and involved 44,802 offered items.<sup>4</sup> Contract negotiations for 21 of the 22 proposals were complete as of May 8, 2025, and the OIG's recommendations assisted contracting officers in obtaining \$17.4 million in contract savings for VA over the life of the contracts.

This report provides an overview of the OIG team's actions related to these preaward reports:

- **Provided an opinion as to whether the commercial sales practice disclosures in the proposals were accurate, complete, and current.** The OIG found that commercial sales

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<sup>1</sup> The National Acquisition Center, part of the Office of Procurement, Acquisition and Logistics, is within VA's Office of Acquisition, Logistics, and Construction. Under the [FSS](#) and [National Contract Programs](#), the National Acquisition Center makes high-volume multiple awards from the established schedule, national contracts, and blanket purchase agreements for the acquisition and direct delivery of pharmaceuticals; medical, surgical, dental, and patient mobility equipment/supplies; high-technology medical equipment; temporary allied healthcare staffing services; and just-in-time distribution programs. The FSS supports the healthcare requirements of VA and other government agencies.

<sup>2</sup> This report is a review that meets the Council of the Inspectors General for Integrity and Efficiency quality standards for inspections and evaluations. Each underlying project conducted in fiscal year 2024 resulted in a report to the appropriate VA contracting officer; the underlying reports were performed to other standards.

<sup>3</sup> 18 U.S.C. § 1905; 41 U.S.C. § 423(a); 38 C.F.R. § 1.558(c).

<sup>4</sup> Dollar amounts are rounded.

practice disclosures were accurate, complete, and current for four of the 22 proposals reviewed. This means four were reliable for determining negotiation objectives and ultimately fair and reasonable pricing. The remaining 18 proposals could not be reliably used for negotiations until the noted deficiencies were corrected. The deficiencies the OIG identified were largely related to lower sales prices found than the disclosed most-favored-customer prices.<sup>5</sup>

- **Recommended pricing based on the vendor’s commercial selling practices.** The OIG recommended lower prices than offered for 15 proposals, resulting in the VA National Acquisition Center awarding contracts or modifications with cost savings of approximately \$17.4 million (18.69 percent of the estimated cost savings of \$93.2 million).<sup>6</sup>
- **Evaluated and suggested alternative tracking customers.** Tracking customers, either individually or as a category, serve as a benchmark for potential price reductions during the life of the contract. If tracking customers receive a price reduction, the government’s price should also be reduced.<sup>7</sup>

Of the 22 proposals reviewed, the OIG determined the proposed tracking customers for two proposals covering 56 of the 44,802 offered items (0.1 percent) were not suitable. A vendor’s proposed tracking customer may not be suitable if the customer does not have buying patterns similar to FSS users or if the offered products are not on the proposed tracking customer’s contract. In those cases, the OIG recommended different tracking customers, generally from among the vendor’s largest commercial customers. Of the 22 proposals reviewed, no tracking customer recommendations could be made for five proposals covering 28,077 of the 44,802 items (62.7 percent). This was because the vendors were dealers or resellers without significant commercial sales or customers.

This report details the proposals the OIG assessed to determine if they were accurate, complete, and current. It also provides summary information about pricing and the recommendations made

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<sup>5</sup> VA FSS Solicitation No. RFP-797-FSS-99-0025-R10, attachment 02, “Vendor Response Document,” “COMMERCIAL SALES PRACTICE FORMAT.” The solicitation defines the most-favored customer as the commercial customer who receives the best up-front (guaranteed) discount. This is not inclusive of “conditional” discounts, such as prompt payment discounts or annual rebates based on reaching a threshold, which must be listed in the vendor’s commercial sales practices disclosure.

<sup>6</sup> Contracting personnel are not always able to obtain the OIG-recommended price during negotiations. The OIG’s estimated total cost savings were adjusted downward from \$93.4 million to \$93.2 million to account for one contract that is pending award (table A.1 in appendix A). Appendix B presents the scope and methodology for this review.

<sup>7</sup> General Services Administration Acquisition Manual 552.238-81, “Price Reductions,” May 2019. The manual requires the government and the vendor to agree on a customer or category of customers as the basis of the award. FSS pricing is tracked against this customer’s (or customer category’s) pricing throughout the contract.

to VA. This report makes no additional recommendations that necessitate any action or response by VA.

The acting associate executive director of the National Acquisition Center concurred with the draft report and provided no comments. Appendix C provides the full text of the director's response.<sup>8</sup>



LARRY M. REINKEMEYER  
Assistant Inspector General  
for Audits and Evaluations

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<sup>8</sup> The contract award documentation for report number 16 was provided after the OIG initiated the process for the draft report to be sent to the director for comment. The effect of the award-adjusted cost savings is 18.69 percent of \$93.2 million.

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## Abbreviations

FAR	Federal Acquisition Regulation
FSS	Federal Supply Schedule
FY	fiscal year
GSA	General Services Administration
OIG	Office of Inspector General



## Introduction

The VA Office of Inspector General (OIG) examines proposals submitted by commercial contractors to VA's National Acquisition Center for Federal Supply Schedule (FSS) contracts that have an anticipated annual value of \$3 million or more.<sup>9</sup> Additionally, the OIG examines proposals for contracts with an anticipated annual value of \$500,000 or more from dealers or resellers without significant sales to the general public and other proposals requested by VA. These proposals are assessed by the OIG before the National Acquisition Center awards contracts.<sup>10</sup> VA's National Acquisition Center guidelines require preaward reviews to help inform decision-making and prevent the waste of VA funds.<sup>11</sup> Contracting officers use OIG price recommendations to help negotiate better prices than those offered in proposals; however, there is no guarantee that the government will receive the price recommended by the OIG.

The individual reports resulting from the OIG's assessment of each proposal for an FSS contract are not published because they contain sensitive commercial pricing information and data protected from release under federal law.<sup>12</sup> To promote transparency, this report provides a summary of the 22 unpublished preaward reports on nonpharmaceutical proposals the OIG issued during fiscal year (FY) 2024.

## Purpose of Preaward Reports

The findings and recommendations resulting from the OIG's preaward reports are intended to assist VA contracting officers in negotiating fair and reasonable pricing with vendors.<sup>13</sup> The OIG conducts this work to validate the commercial sales practice disclosures required in the vendor's FSS proposal, identify any prices lower than those offered to the government for products or services, and propose alternative tracking customers when appropriate as the basis for future

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<sup>9</sup> The National Acquisition Center, part of the Office of Procurement, Acquisition and Logistics, is within VA's Office of Acquisition, Logistics, and Construction. Under the [FSS](#) and [National Contract Programs](#), the National Acquisition Center makes high-volume multiple awards from the established schedule, national contracts, and blanket purchase agreements for the acquisition and direct delivery of pharmaceuticals; medical, surgical, dental, and patient mobility equipment/supplies; high-technology medical equipment; temporary allied healthcare staffing services; and just-in-time distribution programs. The FSS supports the healthcare requirements of VA and other government agencies.

<sup>10</sup> All preaward reviews are conducted at the inspector general's discretion and noted in the VA OIG's Semiannual Reports to Congress. IG Act of 1978, 5 U.S.C. §§ 405(a)(5)(E), 406(A)(2).

<sup>11</sup> VA National Acquisition Center Procedural Guideline 22, *OIG Contract Audit Procedures*, February 9, 2023. There is no indication in the guideline that it is attempting to categorize the OIG contract work under the Council of the Inspectors General for Integrity and Efficiency or any other standard but is rather using the term "review" in a colloquial sense of looking at a document with a particular purpose in mind.

<sup>12</sup> 18 U.S.C. § 1905; 41 U.S.C. § 423(a); 38 C.F.R. § 1.558(c).

<sup>13</sup> VA National Acquisition Center, Procedural Guideline 22; Federal Acquisition Regulation (FAR) 2.101. The FAR defines a contracting officer as "a person with the authority to enter into, administer, and/or terminate contracts and make related determinations and findings ... A single *contracting officer* may be responsible for duties in any or all of these areas."

pricing.<sup>14</sup> The contracting officer is responsible for negotiating the actual prices with the vendor and ultimately determining that the offered prices are fair and reasonable.

One of the primary acquisition programs for which the OIG provides recommendations in preaward reports is VA's FSS program. The FSS program provides the government with a simplified process for acquiring commercial supplies and services in varying quantities while obtaining volume discounts.<sup>15</sup> This report provides a summary of the OIG's findings and recommendations made to VA contracting officers for the 22 proposals examined for FSS nonpharmaceutical contracts in FY 2024.

## VA Federal Supply Schedule Program

The General Services Administration (GSA) delegated authority to the VA National Acquisition Center to award and administer nine supply schedules to support the healthcare acquisition needs of VA and other government agencies.<sup>16</sup> FSS awards are indefinite-delivery, indefinite-quantity contracts awarded to vendors.<sup>17</sup> Additionally, the FSS program negotiates firm, fixed pricing based on a commercial most-favored-customer pricing concept and includes an option for economic price adjustments.<sup>18</sup>

The goal of the FSS program is to leverage the entire federal government's purchasing power to drive volume-based discounts for healthcare requirements at fair and reasonable prices to all authorized FSS users.<sup>19</sup> Federal agencies purchase approximately \$21.4 billion annually in products and services through the nine supply schedules managed by VA.<sup>20</sup> GSA and VA have established regulations, policies, and procedures to help ensure that the government receives the

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<sup>14</sup> VA National Acquisition Center, Procedural Guideline 22. "Commercial Sales Practices" (web page), Office of Procurement, Acquisition and Logistics, accessed November 11, 2024, <https://www.fss.va.gov/fss/faqs/csp.asp>. The Office of Procurement, Acquisition and Logistics defines the tracking customer as "the customer, or category of customer, against which awarded FSS pricing is tracked. This relationship is utilized throughout the life of the contract to determine the potential for price changes. The tracking customer must be someone that represents the Government's discount. The tracking customer is negotiated at time of contract award and the addition of products. In the price reductions clause, the tracking customer is referred to as the basis of award."

<sup>15</sup> FAR 8.402(a); VA Federal Supply Schedule Service (web page), accessed December 12, 2024, <https://www.fss.va.gov/>.

<sup>16</sup> FAR 8.402(a); VA Federal Supply Schedule Service (web page).

<sup>17</sup> FAR 16.5; FAR 6-102(3); FAR 2.101. According to federal regulation, "full and open competition ... means that all responsible sources are permitted to compete."

<sup>18</sup> VA FSS Solicitation No. RFP-797-FSS-99-0025-R10, attachment 02, "Vendor Response Document," "COMMERCIAL SALES PRACTICE FORMAT." The solicitation defines the most-favored customer as the commercial customer who receives the best up-front (guaranteed) discount. This does not include "conditional" discounts, such as prompt payment discounts or annual rebates based on reaching a threshold which the vendor must list in its commercial sales practice disclosures, FAR 552.238-120.

<sup>19</sup> FAR 38.101(a); FAR 8.404(d).

<sup>20</sup> FY 2024 sales data from the National Acquisition Center Contract Management Database, as of December 18, 2024. VA Federal Supply Schedule Service (web page), National Acquisition Center.

best prices for products and services and that FSS vendors are following all the terms and conditions of their contracts.

VA established guidelines for requesting an OIG review of proposals and contracts submitted under or related to contracts or solicitations issued by the VA National Acquisition Center.<sup>21</sup> As previously stated, the guidelines require contracting officers to submit vendors' FSS proposals to the OIG to assess before VA awards a contract if the proposals meet the dollar thresholds for the type of vendor and the items are not significantly sold to the public. VA contracting officers may also request that the OIG review particular proposals.

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<sup>21</sup> VA National Acquisition Center Procedural Guideline 22.

## A Summary of FY 2024 Nonpharmaceutical Preaward Reports to Contracting Officers

The 22 proposals the OIG reviewed during FY 2024 had an estimated contract value of approximately \$1.8 billion and included 44,802 offered items.<sup>22</sup> For each of the 22 proposals the OIG reviewed, the primary objectives were to

1. provide an opinion as to whether the commercial sales practice disclosures in the proposals were accurate, complete, and current;
2. evaluate offered prices and concessions and provide pricing recommendations; and
3. determine if the proposed tracking customers were appropriate for price reduction clause purposes and suggest alternatives as warranted.

### What the OIG Did

The OIG team summarized the results and impact of the 22 reports by objective. Collectively, among the 22 reports, the OIG team sampled 485 of the 44,802 items offered under the proposals; those items generally represented at least 75 percent of the historical government sales under each proposal. To evaluate offered prices and concessions, the team reviewed vendors' commercial sales and agreements and evaluated lower-than-offered prices. The OIG team also analyzed proposed tracking customers for the sample items to determine if customers were suitable for purposes of the GSA price reduction clause.<sup>23</sup>

The OIG's work on each of the 22 nonpharmaceutical proposals is summarized on the following pages and in appendix A. Information on the scope and methodology for this report appears in appendix B.

### Opinion on Commercial Sales Practice Disclosures

The OIG found commercial sales practice disclosures accurate, complete, and current for four of the 22 proposals (18.2 percent). Because the remaining 18 proposals (81.8 percent) did not meet these criteria, they could not reliably be used for negotiations until the noted deficiencies were corrected.

Government contracts generally require competition among vendors to ensure awarded prices are fair and reasonable. Under the FSS program, vendors disclose their commercial prices and terms and conditions on a commercial sales practices form in their FSS proposals. Commercial sales

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<sup>22</sup> Table A.1 in appendix A provides the results for the 22 proposals reviewed. Dollar amounts are rounded.

<sup>23</sup> The price reduction clause is intended to maintain fair and reasonable pricing after the contract has been awarded through the use of tracking customers. If tracking customers receive a price reduction, the government's price should also be reduced.

practice disclosures should be accurate, complete, and current so the contracting officer can use this information to evaluate the proposed prices, set the negotiation objectives, and determine whether the offered prices are fair and reasonable.

The commercial sales practice section of FSS solicitations includes instructions on what vendors must disclose to the government.<sup>24</sup> The instructions state that the customer, “should list the MFC [most-favored customer] as well as each customer or category of customers (e.g. wholesalers, GPOs [group purchasing organization], hospitals, etc.) who are receiving equal to or better pricing than that offered to the Government for any proposed item.”<sup>25</sup>

Vendors are also required to provide detailed information as to how customers may qualify for prices or discounts lower than those offered to the government.<sup>26</sup> Any deviations from the commercial sales practices disclosures or exceptions to the disclosed standard practices must be discussed and explained.<sup>27</sup> For vendors who are dealers or resellers with no significant commercial sales, manufacturers of the offered items should provide commercial sales practice disclosures in accordance with the solicitation instructions. Table 1 lists the findings for the proposals with commercial sales practices that were not accurate, complete, or current, and the number of occurrences.

**Table 1. Commercial Sales Practices Findings**

Commercial sales practices findings	Occurrences among the 18 proposals
Lower than disclosed most-favored-customer pricing identified	18
Discounts not disclosed in figure 515.4-2*	1
Incorrect most-favored customer disclosed	1

*Source: Analysis of commercial sales practice disclosures.*

*Note: Some proposals had more than one deficiency, so the numbers do not sum to 18.*

*\*“Instructions for Commercial Sales Practices Format” in the vendor’s commercial sales practices disclosure.*

For the 18 proposals in FY 2024, vendors generally did not follow solicitation or modification instructions regarding most-favored-customer disclosures or pricing; therefore, the contracting officer could not rely on the commercial sales practices to make fair and reasonable price determinations to award FSS contracts or add products to existing contracts.

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<sup>24</sup> VA FSS Solicitation No. RFP-797-FSS-99-0025-R10. The same instructions apply to proposed contract modifications.

<sup>25</sup> VA FSS Solicitation No. RFP-797-FSS-99-0025-R10, instructions for “Commercial Sales Practices Format.”

<sup>26</sup> VA FSS Solicitation No. RFP-797-FSS-99-0025-R10, question (3).

<sup>27</sup> VA FSS Solicitation No. RFP-797-FSS-99-0025-R10, question (4)(b).

## Evaluation of Offered Prices and Related Recommendations

The government is not always offered the best commercial pricing (in other words, the lowest commercial price). In those instances, the OIG considers commercial prices lower than the offered FSS price in its recommendation. This determination may result in cost savings, which are the potential dollar effect from implementing a price recommendation that would reduce the cost of medical supplies and equipment and make these funds available for other uses.

The OIG calculates estimated cost savings as the difference between the vendor's offered prices and the OIG's recommended prices, multiplied by historical order volume, and extrapolated over the applicable contract period. For example, a new contract could be 10 years, but a product addition or contract extension could range from one to 10 years, depending on the remaining contract performance period.

The OIG recommended seeking lower-than-offered prices for 15 of the 22 proposals. Overall, VA sustained approximately \$17.4 million (18.69 percent) of the OIG's adjusted estimated cost savings of \$93.2 million.<sup>28</sup>

## Evaluation of Proposed Tracking Customers

FSS contracts are generally awarded for an initial five-year base period and can be extended by up to five years, not to exceed 10 years. To maintain fair and reasonable pricing after the contract has been awarded, the GSA price reduction clause mandates lowering the FSS contract price based on price reductions given to negotiated tracking customers.<sup>29</sup>

Of the 22 proposals the OIG reviewed, five lacked tracking customers (table 2). No tracking customers were provided because the vendors were dealers or resellers with no commercial sales. Therefore, there was no customer to track against. In these situations, the government loses the benefit of the price reduction clause.

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<sup>28</sup> Due to the unique terms and conditions of commercial contracts, contracting personnel are not always able to obtain the OIG-recommended price during negotiations. The estimated cost savings was adjusted downward from \$93.4 million to \$93.2 million to account for the exclusion of one contract that was not yet awarded by VA. The contract award documentation for report number 16 was provided after the OIG initiated the process for the draft report to be sent to the director for comment. The effect of the award-adjusted cost savings is 18.69 percent of \$93.2 million.

<sup>29</sup> GSA Acquisition Manual 552.238-81, "Price Reductions," May 2019. The manual requires the government and the vendor to agree on a customer or category of customers as the basis of the award. FSS pricing is tracked against this customer's (or customer category's) pricing throughout the duration of the contract.

**Table 2. Proposals Without Tracking Customers**

Number of proposals	Sampled items affected	Total items	Percent of total items (%)
5	28,077	44,802	62.7%

*Source: OIG reports and VA National Acquisition Center contract files.*

*Note: Percentages are rounded.*

Moreover, the OIG found that, in two of the 22 proposals, tracking customers were not suitable (table 3). Proposed tracking customers are not suitable if the customers do not have buying patterns like those of FSS users or the offered products are not on the proposed tracking customer's contract.

**Table 3. Proposals with Unsuitable Tracking Customers**

Number of proposals	Sampled items affected	Total items	Percent of total items (%)
2	56	44,802	0.1%

*Source: OIG reports and VA National Acquisition Center contract files.*

*Note: Percentages are rounded.*

For these two proposals, the OIG recommended using the vendor's largest commercial customers, all commercial customers. The recommendation of all commercial customers is made if the OIG determines no other customer or customer group has the products on its current contract for price reduction clause purposes.

## Conclusion

The federal government spends billions of dollars a year on medical supplies and services through VA's FSS program. The OIG's findings and recommendations in preaward reports help VA contracting officers reduce the cost of medical supplies, saving taxpayers approximately \$17.4 million in FY 2024. This report provides summary information about prior recommendations made to VA; it does not propose additional recommendations that require VA's response or action.

## VA Management Comments

The acting associate executive director of the National Acquisition Center concurred with the draft report and provided no comments. Appendix C provides the full text of the director's response.

## **Appendix A: Estimated and Sustained Cost Savings from Reports Provided to Contracting Officers in FY 2024**

During fiscal year (FY) 2024, the VA Office of Inspector General (OIG) reviewed 22 proposals under four nonpharmaceutical schedules representing about \$1.8 billion in estimated contract value—44,802 offered items, of which 485 items generally represented at least 75 percent of total government sales volume. Through the VA Federal Supply Schedule program, the General Services Administration and VA have established regulations, policies, and procedures to help ensure that the government receives the best prices for medical supplies and that vendors are following all the terms and conditions of their contracts.

The OIG's estimated cost savings of approximately \$93.4 million for FY 2024 is the difference between vendor-offered prices and OIG-recommended prices multiplied by the historical quantities purchased by FSS, and multiplied by the years left on the contract.<sup>30</sup> VA's sustained cost savings is the estimated cost savings based on the final prices awarded by the VA contract specialist. Overall, VA was able to sustain approximately \$17.4 million in FY 2024 flowing from the OIG's work that resulted in lower-than-offered-price recommendations for contracts awarded as of the date of this report. Table A.1 shows the proportion of OIG-recommended costs savings that contracting officers were able to sustain for all reviewed and examined proposals.

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<sup>30</sup> Contracting personnel are not always able to obtain the OIG-recommended price during negotiations. The OIG's estimated total cost savings were adjusted downward from \$93.4 million to \$93.2 million to account for one contract that is pending award (table A.1). Appendix B presents the scope and methodology for this review.

**Table A.1. Cost Savings Data for Reports Issued to VA**

Report number	Date issued	OIG's estimated cost savings (\$)	VA's sustained cost savings (\$)	Percent of sustained cost savings (%)	Date awarded
1	11/7/2023	0.00	0.00	0.00	7/11/2024
2	11/17/2023	\$1,694,610.00	\$776,307.00	45.81%	1/30/2025
3	11/17/2023	\$1,343,575.00	0.00	0.00	1/31/2024
4	12/6/2023	0.00	0.00	0.00	2/1/2024
5	12/18/2023	\$218,651.00	0.00	0.00	Unknown*
6	1/4/2024	\$5,067,554.00	\$382,456.00	7.55%	2/21/2024
7	1/26/2024	0.00	0.00	0.00	8/16/2024
8	1/31/2024	\$1,034,676.00	\$767,732.10	74.20%	6/18/2024
9	2/9/2024	0.00	0.00	0.00	5/17/2024
10	2/28/2024	\$1,552,093.20	0.00	0.00	12/13/2024
11	3/12/2024	\$40,058,440.00	\$5,510,930.00	13.76%	5/16/2024
12	4/2/2024	0.00	0.00	0.00	12/4/2024
13	5/10/2024	\$6,894,358.50	\$6,894,358.50	100.00%	4/1/2025
14	6/24/2024	\$86,971.20	0.00	0.00	No award
15	7/2/2024	\$451,364.10	0.00	0.00	No award
16	7/9/2024	\$25,052,756.00	\$549.00	0.00	5/7/2025
17	8/6/2024	\$3,059,805.00	\$986,205.00	32.23%	10/11/2024
18	8/19/2024	0.00	0.00	0.00	2/5/2025
19	9/5/2024	\$3,946,692.00	\$422,529.00	10.71%	10/24/2024
20	9/9/2024	0.00	0.00	0.00	12/11/2024
21	9/23/2024	\$1,729,610.40	\$741,957.00	42.9%	4/2/2025
22	11/17/2023	\$1,178,997.00	\$930,167.00	78.89%	9/23/2024
<b>Total</b>		<b>\$93,370,153.40</b>	<b>\$17,413,190.60</b>		

Source: OIG reports and VA National Acquisition Center contract files.

Note: Numbers in table may not sum due to rounding. Percentages are rounded.

\* In negotiations. Without a final award, the total contract savings resulting from OIG recommendations could not be reported.

## Appendix B: Scope and Methodology

### Scope

The VA Office of Inspector General (OIG) team conducted its work from January through July 2025 and focused on summarizing the information in prior OIG preaward reports provided to VA and presenting subsequent contract award data. The team assessed relevant sources of information, including contract documents obtained from VA's electronic contract management system and applicable FY 2024 nonpharmaceutical preaward reports.

### Methodology

The team searched VA's electronic contract management system for the solicitations or modifications that were the subject of an OIG-prepared preaward report and obtained the resulting applicable contract or modification. The team then summarized the data from the review reports and resulting contracts or modifications for presentation in this summary publication.

### Data Reliability

The review team did not obtain or rely on computer-processed data. The team also did not perform detailed fieldwork to verify the information listed in the reports issued to contracting officers and resulting contracts because verification was not the focus of this OIG report.

### Government Standards

The OIG conducted this review in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*.

## Appendix C: VA Management Comments

### Department of Veterans Affairs Memorandum

Date: May 23, 2025

From: Acting Associate Executive Director, National Acquisition Center, Federal Supply Schedule Service (003B1)

Subj: A Summary of OIG Preaward Contract Reports Issued in Fiscal Year 2024 on VA Federal Supply Schedule Nonpharmaceutical Proposals

To: Audit Operations Division (52D02)

1. The Office of Procurement, Acquisition and Logistics (OPAL) completed its review of the subject Draft Report and concurs without comments.

*The OIG removed point of contact information prior to publication.*

(Original signed by)

Christopher D. Parker

*For accessibility, the original format of this appendix has been modified  
to comply with Section 508 of the Rehabilitation Act of 1973, as amended.*

## OIG Contact and Staff Acknowledgments

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<b>Other Contributors</b>	Georgina Baumgartner Roy Fredrikson

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