

VA FEDERAL SUPPLY SCHEDULE

The FSS Contract Renewal Roadmap

A step-by-step reference for pharmaceutical manufacturers preparing a VA Federal Supply Schedule renewal — the deadline math, the five-phase plan, a working timeline, and the complete 65 I B submission checklist.

CONTENTS:

The 180-day rule

5-phase plan

12–14 week timeline

36-point checklist

The deadline that shapes the whole project

Under the VA Federal Supply Schedule program, a renewal offer is due **180 days before your current contract expires**. Everything — data pulls, CSP analysis, packet preparation — is planned backward from that date. Miss the runway and you risk a lapse in your Federal Ceiling Prices to the “Big Four” (VA, DoD, PHS/IHS, Coast Guard).

180

days before expiration
your offer is due

12–14

weeks of focused
preparation work

~7–8

months out is when
you should begin

Work the dates backward from your expiration

Worked example for a contract expiring June 30, 2027. Substitute your own expiration date to find your milestones.

Contract expires	June 30, 2027 — the fixed anchor for every other date
Offer due to VA	January 1, 2027 — 180 days prior to expiration HARD DEADLINE
Submission drafted	Mid–late December 2026 — packet complete, internal sign-off underway
Engagement kick-off	Early October 2026 — ~12–14 weeks before the offer is due
Begin planning	Late September 2026 — align stakeholders, request data, confirm point of contact

The VA may request a CSP refresh or additional information during negotiations, which extends the tail of the project. Build in buffer — do not plan to the deadline.

What is being renewed

Your FSS contract sets the discounted Federal Ceiling Prices at which covered drugs are sold to federal purchasers. The Veterans Health Care Act of 1992 requires manufacturers to list covered drugs on the FSS upon commercial introduction.

What the VA is really evaluating

The heart of the offer is your **Commercial Sales Practices (CSP)** disclosure — your Most Favored Customer and the tracking customer whose discount the government is offered. Getting this right is where renewals are won or lost.

Five phases from kick-off to filing

A proven sequence that turns a complex, high-stakes filing into a controlled, week-by-week workstream.

01

Planning & Kick-Off

SET THE FOUNDATION

- Align on roles, responsibilities, objectives, scope and timeline.
- Establish meeting and communication cadence.
- Prepare the data and document request list.

02

Define Approach

DESIGN THE CSP METHODOLOGY

- Understand current contracts and discount strategy; define data-extract requirements.
- Set the CSP review period, customers/contracts to exclude, and discount methodology.

03

Data Validation & Analysis

TURN TRANSACTIONS INTO EVIDENCE

- Reconcile data to the general ledger; run validations and apply agreed exclusions.
- Analyze data and contractual arrangements to identify discounts for the pricing proposal.

04

Prepare Solicitation

BUILD THE PACKET

- Obtain the 65 I B solicitation package and prepare the M5-Q50A-03-R8 packet.
- Populate the CSP disclosure; determine the Most Favored Customer and Tracking Customer.

05

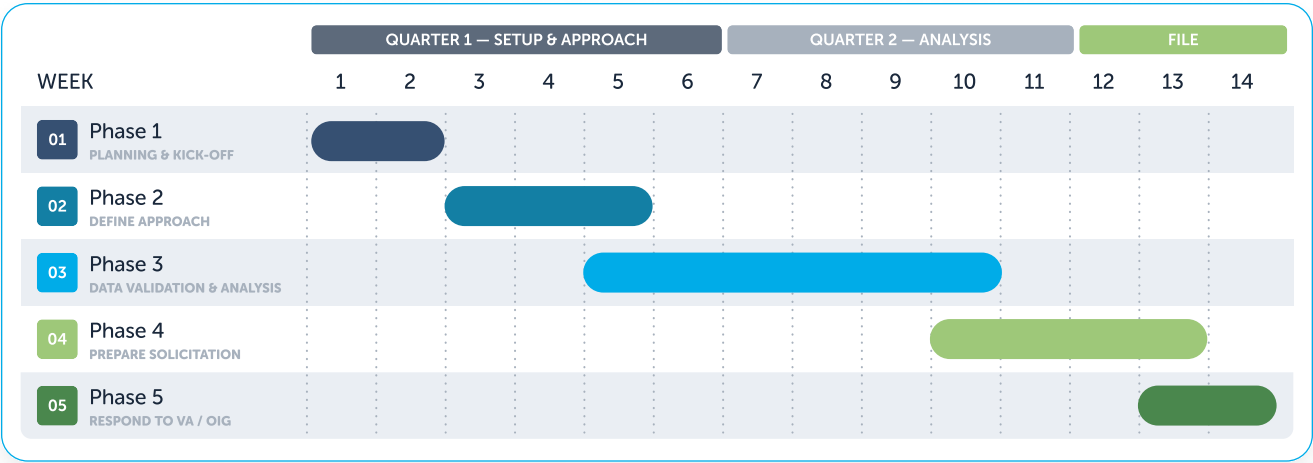
Respond to VA and OIG

CARRY IT THROUGH NEGOTIATION

- Respond to Contracting Officer requests for clarification or additional information.
- Assist with the negotiation and prepare a company-approved response to the VA's formal letter.

A 12–14 week engagement, at a glance

Indicative schedule counting backward from the offer-due date. Phases overlap; data work (Phase 3) is the critical path.



If you have more products or transactions

Larger portfolios (more SINS, more covered drugs, higher transaction volume) push the engagement toward **16–18 weeks**. Front-load Phase 3 data work as “pre-work” so analysis is not compressed near the deadline.

Where slippage usually happens

Delays cluster in two places: getting **complete, accurate source data** from the manufacturer, and **internal approvals** of the CSP methodology. Naming a decision-empowered point of contact up front protects the schedule.

Where renewals go wrong

The most common, most costly mistakes we see — and the ones this roadmap is designed to prevent.

-  **Starting too late.** The 180-day offer deadline is fixed. Teams that begin under three months out compress data analysis and lose negotiating room.
-  **A weak MFC / tracking-customer rationale.** The CSP disclosure is the center of the offer. An undocumented or indefensible Most Favored Customer determination invites OIG scrutiny and price erosion.
-  **Data that won't reconcile.** Transactional data that does not tie to the general ledger stalls the analysis and undermines credibility with the Contracting Officer.
-  **Format & signature slips.** Sending the price list as a PDF, or using electronic signatures, gets packages bounced. Small mistakes, real delays.

How Riparian helps

We manage FSS renewals end to end — from data strategy through the VA negotiation — so your team stays focused on the business. Typical deliverables:

01

Completed Solicitation Package

A full submission ready for filing with the VA Contracting Officer.

02

MFC & Tracking Customer Analysis

Documented, defensible determinations behind your proposed pricing.

03

CSP Documentation

Support for the disclosure and any recertifications the VA requests.

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Is your FSS contract expiring soon?

Whatever your timeline, let's map the runway together.

TALK TO RIPARIAN

