

HCaTS Draft Request for Proposal (DRFP) Q&A

Tuesday, May 19, 2015

Please note: All information is subject to change. We are sharing this information now for transparency. Please continue to check the HCaTS interact blog for additional updates

Question	Answer	Category / Topic
If the offeror possesses a Top Secret Facility Clearance, can they claim the points for Secret and Top Secret since they exceed the 'Secret' Facility Clearance level requirements?	This scoring element will be removed.	Accreditation
Will the government also accept the Associate Certified Coach (ACC) certification for HCaTS key personnel?	We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.	Accreditation
Additional points are awarded for several certifications that are relevant to the performance of HCaTS related services (ISO 9001, CMMI, etc), but the sustainability certification isn't relevant to the offerors ability to effectively perform human capital and training services. Can the government explain how sustainability certification is relevant to an offerors ability to perform services under the HCaTS contract?	The HCaTS PMO has removed ISO 14001:2004 as an accreditation and it will not appear in the final RFP.	Accreditation
Many training & learning professionals have degrees that are not specifically in "Instructional Systems Design" but are focused on design & development of learning experiences for adult learners. Will the government accept alternative degrees in areas such as: Education, Adult Learning, Instructional Technology, or Adult Education / Training & Development?	We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.	Accreditation
Many human capital and training experts have degrees in relevant fields that are not specifically identified as human resources or human capital. Will the government accept degrees in disciplines such as: Industrial/Organizational Psychology, Organization Development, Management, or Business Management/Administration?	We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.	Accreditation
P.53, Section H.6.1 Question: Please confirm whether or not the small business must have a recent DCAA audit. Specifically, being audited is outside the control of a (small) business as it's the government's decision who and when to audit, and many small firms have never received an audit. Our accounting system (Deltek) is capable of being fully compliant with DCAA's requirements for an acceptable accounting system. Please confirm if the government is requiring small businesses that bid on this effort to have had an audit prior as a condition of bidding on (or being awarded this) IDIQ or if either of the following would be acceptable: (1) An outside firm conducts an audit of the potential awardee following the same audit requirements as DCAA and presents a determination of findings to the government, or (2) The government notifies DCAA to come in and audit those businesses without audits prior to making a final award.	All Offerors that are considered for award based on being in the Top 40 proposals per Pool will have the option to have their accounting system audited by DCAA. If an Offeror has an accounting system that was audited by the DCAA within the last three years and there have been no changes, their system will not need to be audited again. Only Offerors with audited accounting systems will be able to compete for cost-reimbursable type work at the task order level.	Accreditation
H.6.5 EVMS is primarily used on large production contracts. Since this contract is focused on HCaTS, it is not reasonable to use attainment of EVMS certification as a discriminator. Recommend elimination of EVMS as a scoring factor.	Although the FAR requires the use of EVMS in major acquisitions for IT/systems development, there may be task orders issued under HCaTS that can benefit from EVMS, especially under KSA 3.	Accreditation

<p>H.6.5 The use of commercially integrated EVMS systems, such as DELTEK’s EVMS module, provide similar benefits as a self-administered ANSI/EIA Standard-748 certified system. Will the HCaTS team consider commercially integrated business system EVMS tools, such as Deltek’s ERP EVMS module, for points under L.5.4.4?</p>	<p>No</p>	<p>Accreditation</p>
<p>H.6.8 ISO 14001:2004 specifically allows for self-certification. Companies working with the certification, therefore, may or may not have a 3rd party providing independent validation of the use of these processes and yet this may make a difference in scoring. Recommend acceptance of self-certification or removing this certification from the scoring evaluation.</p>	<p>This Accreditation has been removed.</p>	<p>Accreditation</p>
<p>H.6.2-5: We recommend removing the award of additional points for the possession of audited estimating and purchasing systems as well as forward pricing rates agreements (FPRA), forward pricing rate recommendations (FPRP), and approved billing rates. We appreciate that the HCaTS PMO is not considering these as mandatory or minimum requirements; however, Offerors who have met these criteria should not be considered more favorably. These additional requirements are applicable to cost reimbursable contracts and have no bearing on the ability of Offerors to successfully deliver on other types of contracts. We understand that the HCaTS PMO is seeking to identify objective evaluation criteria by which to differentiate contractors, but we do not believe these are objective criteria that demonstrate the quality of the service being provided. These additional criteria will bias the selection of contractors based upon criteria that do not relate to value provided to the government for non-cost-reimbursable contract types. We propose that the HCaTS PMO categorize contractors based on cost accounting standards criteria; but do not limit those contractors that do not intend to bid on cost-reimbursable from being eligible for award.</p>	<p>This recommendation was considered but the RFP will not be amended.</p>	<p>Accreditation</p>
<p>H.6.1: We recommend removing the requirement that Offerors possess a DCAA-audited accounting system. This mandatory requirement may disqualify Offerors with strong relevant capabilities from participating and reduce competition at the task order level. We recognize that there are instances in which Cost Plus contracts are necessary and that a certified accounting system supports these contracts, but a large number of task orders issued under HCaTS will not fit under this description and are likely to be firm fixed price. There are also challenges associated with cost reimbursable contracts, such as added administrative costs and constrained access to an Offeror’s full complement of services. As a result, we recommend only requiring cost reimbursable contract pricing at the task order level, when necessary. Cost reimbursable contract pricing could become a feature of the IDIQ contract, but not a requirement or evaluation criterion. We propose that HCaTS PMO categorize contractors based on cost accounting standards criteria; but do not limit those contractors that do not intend to bid on cost-reimbursable from being eligible for award. This approach will provide contracting agencies the flexibility of when (and when not) to require cost reimbursable contract pricing, while expanding competition.</p>	<p>This recommendation was considered.</p>	<p>Accreditation</p>

<p>L.5.4.3 Credit is applied for the scoring element of Forward Pricing Rate Agreements (FPRA), Forward Pricing Rate Recommendations (FPRR), and/or Approved Billing, if applicable. This element, however, is not scored evenly. There are more points awarded for FPRAs vs. FPRRs - and further based on time of approval (even points for expired FPRAs or expired Approved Billing Rates). It is requested that GSA reconsider this methodology and award one set of points for any current FPRA, FPRR, and/or Approved Billing Rates. This would be fair and consistent with the methodology of scoring under OASIS.</p>	<p>We will revisit the allocation of points for each scoring element.</p>	<p>Accreditation</p>
<p>section H.7 "Cost Accounting Standards": Per 48 CR 9903.201-1, CAS is not required for Firm Fixed Price or commercial item acquisitions; both of which will be allowable under the HCATS contract vehicle per the RFP at page 5 section B.1.6 "Contract Type". The Excel document J.7 Cost-Price Worksheet is set up to exclusively display cost-reimbursement pricing elements (direct labor, fringe, G&A, overhead, profit, etc.) and does not provide a section for offerors to display FFP labor rates. Additionally, the RFP instructs offerors that they are not allowed to modify the pricing template. How shall offerors who are exempt from having an DCAA-approved CAS system propose their FFP rates?</p>	<p>The labor rates awarded under HCaTS will be awarded as Fixed Price with Economic Price Adjustment (FP EPA), to be referenced only when a sole-sourced Time-and-Materials task order is issued. To ensure the labor rates are fair and reasonable and the Offeror is complying with its accounting system, Attachment J.7 requires of Offerors to breakdown their cost elements that make up the fully burdened rate per labor category.</p>	<p>Accreditation</p>
<p>L.4.1, L.5.4.1: Should the offeror submit two separate documents since the requirement in L.5.4.1 is to submit an official audit report and to provide POC information and reference page and paragraph of the audit? This requirement conflicts with the Proposal Format Table. The table indicates that the page limit is limited to the audit only. If the offeror is to submit two separate documents, what naming convention should be used for the second document?</p>	<p>This information will be input into the Self-Scoring Sheet (Attachments J.5.1 and J.5.2).</p>	<p>Accreditation</p>
<p>L.4.1, L.5.4.2 Should the offeror submit two separate documents since the requirement in L.5.4.2 is to submit an official audit report and to provide POC information and reference page and paragraph of the audit? This requirement conflicts with the Proposal Format Table. The table indicates that the page limit is limited to the audit only. If the offeror is to submit two separate documents, what naming convention should be used for the second document?</p>	<p>This information will be input into the Self-Scoring Sheet (Attachments J.5.1 and J.5.2).</p>	<p>Accreditation</p>
<p>L.4.1 and L.5.4.3 Should the offeror submit separate documents since the requirement in L.5.4.3 is to submit an official audit report and to provide POC information and reference page and paragraph of the audit? This requirement conflicts with the Proposal Format Table. The table indicates that the page limit is limited to the audit only. If the offeror is to submit two separate documents, what naming convention should be used for the second document for the FPRA, FPRR, and Approved Billing Rates?</p>	<p>This information will be input into the Self-Scoring Sheet (Attachments J.5.1 and J.5.2).</p>	<p>Accreditation</p>
<p>L.4.1, L.5.4.4 Should the offeror submit two separate documents since the requirement in L.5.4.2 is to submit an official audit report and to provide POC information and reference page and paragraph of the audit? This requirement conflicts with the Proposal Format Table. The table indicates that the page limit is limited to the audit only. If the offeror is to submit two separate documents, what naming convention should be used for the second document?</p>	<p>This information will be input into the Self-Scoring Sheet (Attachments J.5.1 and J.5.2).</p>	<p>Accreditation</p>

<p>L.4.1, L.5.4.5 Should the offeror submit two separate documents since the requirement in L.5.4.5 is to submit a certification and to provide POC information and reference page and paragraph of the certification? This requirement conflicts with the Proposal Format Table. The table indicates that the page limit is limited to the certification only. If the offeror is to submit two separate documents, what naming convention should be used for the second document?</p>	<p>This information will be input into the Self-Scoring Sheet (Attachments J.5.1 and J.5.2).</p>	<p>Accreditation</p>
<p>L.4.1, L.5.4.6 Should the offeror submit two separate documents since the requirement in L.5.4.5 is to submit a certification and to provide POC information and reference page and paragraph of the certification? This requirement conflicts with the Proposal Format Table. The table indicates that the page limit is limited to the certification only. If the offeror is to submit two separate documents, what naming convention should be used for the second document?</p>	<p>This information will be input into the Self-Scoring Sheet (Attachments J.5.1 and J.5.2).</p>	<p>Accreditation</p>
<p>L.4.1, L.5.4, 7 Should the offeror submit two separate documents since the requirement in L.5.4.5 is to submit a certification and to provide POC information and reference page and paragraph of the certification? This requirement conflicts with the Proposal Format Table. The table indicates that the page limit is limited to the certification only. If the offeror is to submit two separate documents, what naming convention should be used for the second document?</p>	<p>This information will be input into the Self-Scoring Sheet (Attachments J.5.1 and J.5.2).</p>	<p>Accreditation</p>
<p>We are a current small business TMA contractor and have been performing training and human capital studies for over 17 years. We have never once needed many of the certifications called for in the solicitation (e.g., ISO, CMMI, EVS). We believe there is the danger, that having these certifications in the scoring system could skew the outcomes in unanticipated ways. For example, it may be that small business IT firms that do some human capital and training projects on the side would score higher than true training and human capital firms. We request you eliminate these certifications (or further reduce their point count).</p>	<p>We have removed the ISO 14001 and CMMI certifications and the Contractor Key Personnel scoring element due to Industry Feedback.</p>	<p>Accreditation</p>
<p>The current requirements and evaluation criteria outlined for vendors to compete on the small business vehicle significantly impact the number of qualified vendors to support this human capital requirement. Moreover, the evaluation criteria are hyper-focused on operational processes (e.g., EVM, estimating systems) rather than on the core of what the Government is interested in—quality of services to customers. Based on the current requirements, it is questionable as to whether the Government will get the most qualified pool of small businesses. It is our recommendation that the Government consider removing these additional process-centric evaluation criteria for the HCaTS SB vehicle and rather focus on criteria that evaluate the vendors' ability to successfully deliver goods and services to the Government.</p>	<p>We have removed the ISO 14001 and CMMI certifications and the Contractor Key Personnel scoring element due to Industry Feedback.</p>	<p>Accreditation</p>

<p>C.3.3 Given that IT is considered an ancillary support service or product on HCaTS task orders, will the Government remove additional scoring points for EVMS? Justification/Reason/Explanation: The FAR only requires the use of EVMS in major acquisitions for IT/systems development. Similarly, OPM-specific guidance requires EVMS in major acquisitions for IT development. IT and system development/maintenance are ancillary services under HCaTS. Federal EVMS compliance accreditation is limited, by the government, to contractors supporting major programs. Contractors specializing in human capital and training solutions are unlikely to have accredited EVMS and therefore will be penalized relative to large system integrators that also happen to provide HC and TS.</p>	<p>Although the FAR requires the use of EVMS in major acquisitions for IT/systems development, there may be task orders issued under HCaTS that can benefit from EVMS, especially under KSA 3.</p>	<p>Accreditation</p>
<p>L.5.4.7 ISO 14001:2004 specifies the requirements of an environmental management system (EMS). The registration/certification process is costly and can take several years. Will the government remove additional scoring points for ISO 14001:2004? Justification/Reason/Explanation: Contractors specializing in human capital and training solutions are unlikely to have accredited EMS and therefore will be penalized relative to large system integrators, manufactures and ther suppliers that also happen to provide Human Capital and Training services.</p>	<p>This accreditation will be removed from the RFP.</p>	<p>Accreditation</p>
<p>H.6.1-3 The Department of Defense (DOD) has established business system criteria in the DOD Federal Acquisition Regulation Supplement (DFARS), see DFARS 252.242-7005. In accordance with the DFARS requirements, the adequacy of contractor business systems is determined by the cognizant Administrative Contracting Officer (ACO). Will GSA accept DOD ACO determinations of business system adequacy in lieu of DCAA audit results?</p>	<p>Yes, a Cognizant Federal Agency auditing any accreditation with the exception of the Accounting System is allowed.</p>	<p>Accreditation</p>
<p>H.6.1-3 In many cases, DCAA has never audited a contractor's accounting system. If DCAA has never audited the contractor's accounting system is the contractor ineligible for award under the HCATS program? Would a DCMA ACO determination of adequacy suffice in lieu of a DCAA audit?</p>	<p>All Offerors that are considered for award based on being in the Top 40 proposals per Pool will have the option to have their accounting system audited by DCAA. If an Offeror has an accounting system that was audited by the DCAA within the last three years and there have been no changes, their system will not need to be audited again. Only Offerors with audited accounting systems will be able to compete for cost-reimbursable type work at the task order level.</p>	<p>Accreditation</p>
<p>H.6.4 The creation and change of FPRA, FPRR, PBR and/or Approved Billing Rates is frequently the result of negotiation with the cognizant ACO. If there is no audit report, is there a specific submission requirement for some other type of information or will a contractor explanation of the change be sufficient?</p>	<p>The RFP will be amended to allow for a CFA's Contracting Officer's determination as verification. It will also be amended to state that the FPRA, FPRR, and Approved Billing Rates shall have be current and audited/determined acceptable within the last three years.</p>	<p>Accreditation</p>
<p>Does the Government have performance data that demonstrates that a company having ISO certification or a CMMI rating performs better than companies that do not have ISO certification or CMMI rating?</p>	<p>The CMMI Certification will be removed from the RFP. There will also be changes to the ISO accreditations that are scoring elements. These were determined based on reseach and industry feedback.</p>	<p>Accreditation</p>

<p>How will the Government verify that the division/organization/group within the company that submits a proposal stating that they are ISO certified are actually the division/organization/group that will be performing the work?</p>	<p>The Offeror shall submit enough verifiable information to substantiate the division/organization/group that is submitting the proposal is the one that has the certification. The HCaTS PMO will audit contracts and reach out to Ordering Contracting Officers to verify that the Contractor is performing in accordance with its contract.</p>	<p>Accreditation</p>
<p>What is the value of an Earned Value Management Systems in the Size Standard for small businesses under \$11 million (Pool 1)?</p>	<p>The HCaTS PMO chose accreditations based on their value for work that may be performed and not based on size standard.</p>	<p>Accreditation</p>
<p>Will the Government consider providing credit for accreditations such as IACET, whereby Offerors have undergone a rigorous third-party review and have met the nationally-recognized standards set forth by ANSI and IACET to ensure high quality continuing education and training programs for adult learners? IACET is the premier standard-setting organization for the continuing education and training industry, and is an accredited Standards Developing Organization (SDO) by the American National Standards Institute (ANSI). Accreditation by ANSI signifies that IACET's procedures meet the Institute's essential requirements for openness, balance, consensus, and due process. Several large, Federal training institutions are also accredited by IACET, to include, but not limited to FEMA's Emergency Management Institute, the Defense Acquisition University, and the Federal Deposit Insurance Corporation's Corporate University.</p>	<p>This accreditation was previously under consideration and was determined not to be included in the RFP.</p>	<p>Accreditation</p>
<p>ISO 14001 was designed for manufacturers to demonstrate how they protect the environment. Given this is a services-only vehicle can the government explain why application of this standard is relevant (adds points to the evaluation) and how the government intends to apply it post award?</p>	<p>This accreditation has been removed from the final RFP.</p>	<p>Accreditation</p>
<p>When the government requires proof of ISO certification it becomes a cost-reimbursable line item on a contract. Will the government in fact reimburse companies for this certification or consider removing/modifying the ISO requirement to state "company certifies that it follows ISO policies and procedures?"</p>	<p>No, requiring proof of an ISO certification does not make it a cost-reimbursable line item on a contract. Offerors are eligible for additional points if they have an ISO certification, but are prohibited from passing any costs associated with obtaining or maintaining it at the contract level. Depending on the Offeror's accounting system and if the task order permits it, they may be able to pass on the cost at the task order level.</p>	<p>Accreditation</p>

<p>References from C.3.3., M.7: L.5.4.4; L.5.4.5; L.5.4.6; L.5.4.4.7; L.5.4.9 Discussion. C.3.3. states that, "IT is considered ancillary support service or product on task orders and may be performed and/or provided only when the service or product is integral and necessary to complete a total integrated solution under a professional service based requirement within the scope of HCaTS." Yet, the CMMI, ISO, and EVMS requirement are so common to the Federal IT community that even small and disadvantaged set-aside IDIQs require them of the prime. Therefore, these requirements simply serve as barriers to entry for mid-to large HR/HCM companies who do not provide IT professional services. Conversely, any IT company small or large would be able to obtain substantial points for holding these certifications and accreditations regardless of their corporate investment, commitment, and experience in the HR/HCM vertical that is the purpose of HCaTS. Suggestion. Eliminate the EVMS ANSI/EIA, CMMI, and ISO certifications and instead allow them to be included as necessary at the TO level as necessary. Since IT is ancillary to HCaTS, these certifications and accreditations will likely be irrelevant to the majority of HCaTS task orders.</p>	<p>The CMMI and ISO 14001 Certification will be removed from the RFP. There will also be changes to the ISO accreditations that are scoring elements. These were determined based on reseach and industry feedback.</p>	<p>Accreditation</p>
<p>F.5 Performance Standards reads . . . "The Contractor shall maintain throughout the ordering period of HCaTS, at a minimum, the accreditations at time of contract award. For example, if a Contractor's proposal included an acceptable accounting system and ISO 9001:2008 certification and made a part of contract award, then the Contractor shall maintain an acceptable accounting system and ISO 9001:2008 certification for the duration of the HCaTS ordering period."</p> <p>However, as the industry evolves, certain certifications are replaced or superseded by new certifications. Maintaining a certification in these cases may, in fact, not be in the best interest of the government. We recommend the statement be reworded accordingly . . . "The Contractor shall maintain or exceed throughout the ordering period of HCaTS, at a minimum, the accreditations at time of contract award."</p>	<p>The RFP will be amended to reflect your recommendation.</p>	<p>Accreditation</p>
<p>M.7, F.5 Performance Standards reads . . . "An acceptable accounting system is mandatory for all Contractors. Compliance with the Cost Accounting Standards (CAS) are mandatory unless covered by exemption under 48 CFR 9903.201-1 and 48 CFR 9903.201-2. All other accreditations (i.e., certifications, clearances, systems) are optional;"</p> <p>We agree with the government's approach as stated. However, we feel it is contradictory for the government to award evaluation points for optional systems and accreditations when many of these systems can't be certified by DCAA unless the government mandates them. DCAA only approves them only on an as needed basis. We suggest the government not award evaluation points for these optional certifications and systems.</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p> <p>We will keep the optional organizational accreditations but will revisit the allocation of points for each scoring element.</p>	<p>Accreditation</p>

<p>H.6.2 – H.6.8, M.7 In Section H of the RFP, there are numerous certifications that offerors are “encouraged” to have. These include things such as an acceptable estimating and purchasing system, forward pricing rate agreements, EVMS, CMMI Level 3, ISO 9001:2008 and 14001:2004, etc. For the most part, these certifications are not relevant to training and human capital development contracts. In fact, in our 25 year history, completing over 8,000 training and human capital task orders, these certifications/systems have never been required.</p> <p>The certifications listed are far more applicable to Information Technology hardware and services contracts. Therefore, companies that hold these certifications are more likely to be systems integrators, and not companies that specialize in the work being procured under this contract vehicle. Although these certifications are not mandatory, additional evaluation points are assigned for having them. This will put companies specializing in human capital and training development at a disadvantage; this seems contrary to what OPM would want and what would be in the best interest of this contract. We suggest that GSA remove the certifications that are encouraged in H.6.2 – H.6.8 and request that such certifications, if deemed necessary in the future, can be requested at the task order level.</p>	<p>We have removed the Contractor Key Personnel and ISO 14001 Certification scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p> <p>We will keep the optional organizational accreditations but will revisit the allocation of points for each scoring element.</p>	<p>Accreditation</p>
<p>Section H.6, Accreditations, and Section H.6.1, Acceptable Accounting System. Many small businesses, especially 8(a) businesses, have not yet undergone DCAA compliance audits of their accounting systems. Therefore, to demonstrate that a HCaTS SB Contractor maintains an “acceptable accounting system,” how will the determination of “acceptable” status be rendered? Is it adequate for the Contractor to possess an accounting system that is listed on the HCaTS Program Management Office (PMO) master list of acceptable accounting platforms/software systems? Or, alternatively, will each HCaTS SB Contractor be required to submit a statement self-certifying the fact their company possesses an acceptable accounting system? Is self-certification of an acceptable accounting system the purpose of the attached form “J.3, Modified Pre-Award Survey: SF 1408”? How will the acceptability of the accounting system be validated by the PMO and/or OCO? The text in these sections is unclear.</p>	<p>All Offerors that are considered for award based on being in the Top 40 proposals per Pool will have the option to have their accounting system audited by DCAA. If an Offeror has an accounting system that was audited by the DCAA within the last three years and there have been no changes, their system will not need to be audited again. Only Offerors with audited accounting systems will be able to compete for cost-reimbursable type work at the task order level.</p>	<p>Accreditation</p>
<p>Sections L.5.4.6 and L.5.4.7 (Page 127) outline scoring elements for ISO 9001:2008 and ISO 14001:2004 certifications. These certifications are heavily focused on product development and are significantly less relevant to service-oriented industries. Specifically, these certifications are virtually never required for human capital and training tasks. Will GSA consider removing these certification from consideration?</p>	<p>ISO 14001:2004 will be removed from the RFP</p>	<p>Accreditation</p>

<p>Systems and Certifications</p> <p>We recommend that GSA reevaluate the systems and certifications included in the DRFP to ensure that they are relevant to contract performance under the future HCaTS vehicle. There are some included in the current draft that are not applicable to HCaTS type work, such as Earned Value Management System and ISO14001 certification for Environmental Management Systems. Rather than including them in the scoring at the master contract level and putting capable offerors that do not have these accreditations at a disadvantage, it would be more appropriate to allow agencies the option of requiring them at the task order level. Further, in order to maximize competition, systems and certifications that are necessary to the performance of the contract should be considered matters of contract administration. They should not be evaluated subjectively for extra points during the final evaluation for award</p>	<p>The HCaTS Team has removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p> <p>In addition, ISO 14001 and the CMMI certification have been removed.</p>	<p>Accreditation</p>
<p>FPRA/FPRR/Approved billing rates—Credit is applied for Forward Pricing Rate Agreements (FPRA), Forward Pricing Rate Recommendations (FPRR), and/or Approved Billing, if applicable. However, these items are not scored equally. There are more points awarded for FPRAs vs. FPRRs - and further based on time of approval (for expired FPRAs or expired Approved Billing Rates). We recommend that GSA award one set of points for any current FPRA, FPRR, and/or Approved Billing Rates.</p>	<p>We have removed expired FPRAs as a scoring element. Since FPRAs are actual agreements, as oppose to an FPRR, which are just recommendations, we believe the FPRA have additional value.</p>	<p>Accreditation</p>
<p>Comment: In sections L.5.4, the Government includes scoring elements for EVMS ANSI/EIA Standard 748, CMMI Capability Level 3, MCCI Maturity Level I, and ISO certifications. These certifications are most commonly beneficial to and required in the Information Technology (IT) field. They are cost prohibitive for cost conscious, medium sized companies that specialize in Human Resources and Human Capital Management (HR/HCM).</p> <p>Recommendation: We recommend removal of these certifications as scoring elements as they do not reflect the potential success of a prime contractor on HR/HCM type work.</p>	<p>The CMMI certification will be removed from the RFP.</p>	<p>Accreditation</p>

<p>Page 127-129 of the RFP: L.5.4.1 Acceptable Estimating System, L.5.4.2 Acceptable Purchasing System, L.5.4.3 FFRA, L.5.4.4 EVMS Will the government confirm that a small business, if tied to a large business or other entity, may NOT use the other entity's systems as if it were their own for points?</p>	<p>Within a corporate structure, an Offeror may utilize resources from a parent company, affiliate, division, and/or subsidiary provided that the meaningful relationship was in place at the time the contract or task order being submitted as a Relevant Experience Project was performed. The Government shall allow an Offeror to take credit for any evaluation element, including Relevant Experience Project(s), accreditations from a parent company, affiliate, division, and/or subsidiary as long as there is a meaningful relationship to the Offeror and commitment letters are provided to the Government.</p> <p>Affiliates are business concerns that are affiliates of each other if, directly or indirectly, either one controls or has the power to control the other, or another concern controls or has the power to control both.</p> <p>Division is a separate business unit of a company representing a specific business function.</p> <p>Subsidiary means an entity in which more than fifty percent (50%) of the entity is owned directly by a parent corporation; or through another subsidiary of a parent corporation.</p> <p>If none of the above are met, you cannot use their resources.</p>	<p>Accreditation</p>
<p>Section H.6.2, pg 51: Acceptable Estimating System In our experience, an estimating system is required when there is a need for a contractor to provide certified cost and pricing data as outlined in DFAR 215.408(2). FAR 15.403-1 and DFAR 215.403-1 outline the prohibition on obtaining certified cost or pricing data. The type of services outlined in the draft RFP are normally provided as commercial services, and adequate price competition normally exists. Both are scenarios where certified cost and pricing data would not be needed. As such, it is unlikely that the majority of contracts issued under the HCaTS ID/IQ, would require the need for a contractor estimating system. Even if a contractor has an estimating system in place, it is our experience that unless that contractor possesses a significant amount of contract awards in which certified cost and pricing data was required, it is highly unlikely that their estimating system has been audited by DCAA, DCMA, or any other Cognizant Federal Agency. Awarding bonus points for this requirement disadvantages companies that mainly provide commercial services to the federal government. Q15. Would the Government consider removing the requirements outlined in H.6.2 titled Acceptable Estimating System?</p>	<p>This recommendation was considered but the RFP will not be amended.</p>	<p>Accreditation</p>

<p>Section H.6.3, pg 51: Acceptable Purchasing System FAR 44.3 states that a contractors purchasing system review (CPSR) only be conducted “If a contractor’s sales to the Government (excluding competitively awarded firm-fixed-price and competitively awarded fixed-price with economic price adjustment contracts and sales of commercial items pursuant to Part 12) are expected to exceed \$25 million during the next 12 months”. It is our experience that the services that will be requested under this contract are normally procured as commercial services, and will be awarded through the use of firm-fixed-price contracts. Awarding bonus points for this requirement disadvantages companies that mainly provide commercial services to the federal Government, and unless you meet the requirements outlined in FAR 44.3, even if a contractor has a purchasing system that would be deemed acceptable, that contractor has no control over their purchasing system being audited under a CPSR. Q16. Would the Government consider removing the requirements outlined in H.6.3 titled Acceptable Purchasing System?</p>	<p>This recommendation was considered but the RFP will not be amended.</p>	<p>Accreditation</p>
<p>For these optional systems – would the government consider accepting a third party assessment? Or would the government make enough time for offerors to go through a DCAA audit?</p>	<p>No, all optional accreditations shall have been received by the date the RFP closes by a Government entity.</p>	<p>Accreditation</p>
<p>Question: Can the government provide further clarification to the following requirement: The Contractor shall have and maintain an acceptable accounting system that will permit timely development of all necessary cost data in the form required by the proposed contract type. Does this require that the SB have a certified DCAA compliant accounting system?</p>	<p>All Offerors that are considered for award based on being in the Top 40 proposals per Pool will have the option to have their accounting system audited by DCAA. If an Offeror has an accounting system that was audited by the DCAA within the last three years and there have been no changes, their system will not need to be audited again. Only Offerors with audited accounting systems will be able to compete for cost-reimbursable type work at the task order level.</p>	<p>Accreditation</p>
<p>Credit for Earned Value Management Systems should be granted only at the task order level, where it is clear whether and how EVMS is relevant and of value. Consideration should also be given to aligning any EVMS requirement to the new DoD guidance under which the EVMS threshold will be raised to \$100 million.</p>	<p>This recommendation was considered and the RFP will not be amended.</p>	<p>Accreditation</p>

<p>L.5.1.5. and H.6.1 We strongly recommend that the requirement to secure a future DCAA audit not be a pass/fail requirement at the IDIQ level.</p> <ul style="list-style-type: none"> The predecessor contract, TMA, successfully met agencies needs without procuring cost reimbursable contracts, and the requirement at the IDIQ level is overly restrictive for FFP and T&M Task Orders. It penalizes those firms whose core services directly relate to Pools 1 and 2, such as firms who performed successfully under the TMA contract and new competitors who successfully perform for many non-DoD federal agencies as well as other industry sectors but have not required a DCAA audit in the past, while inappropriately providing an advantage to those firms who perform Pool 1 and 2 services as an ancillary function, but have DCAA audits. Given the backlog and time to schedule and complete a DCAA audit, the business case to pursue HCaTS without confidence of being able to compete for task orders cannot be made which will result in significantly less competition for the HCaTS vehicle and post award. 	<p>Offerors are not required to have an audited accounting system prior to award. All Offerors that are considered for award based on being in the Top 40 proposals per Pool will have the option to have their accounting system audited by DCAA. If an Offeror has an accounting system that was audited by the DCAA within the last three years and there have been no changes, their system will not need to be audited again. Only Offerors with audited accounting systems will be able to compete for cost-reimbursable type work at the task order level.</p>	<p>Accreditation</p>
<p>L.5.4.4 We recommend that the government remove the option to receive additional points for an EVMS from the RFP for the following reasons:</p> <ul style="list-style-type: none"> EVMS is required for major acquisitions for development, according to the FAR, Subpart 34.2 and OMB Circular A-11 With the elimination of major development work associated with the original Pool 3 and exclusion of Learning Management Systems, the requirement for EVMS is inconsistent with the FAR applicability and beyond the scope of Pools 1 and 2 Companies who focus on Human Capital and Training services most often would not seek or qualify for a DCMA audit of EVMS 	<p>Although the FAR requires the use of EVMS in major acquisitions for IT/systems development, there may be task orders issued under HCaTS that can benefit from EVMS, especially under KSA 3.</p>	<p>Accreditation</p>
<p>L.5.4.5 With the elimination of the original Pool 3, we recommend modifying this section of the RFP to only include CMMI Maturity Level 3 for Services. Many Training and Human Capital consulting companies do not have CMMI in Development due to the nature of work. Allowing CMMI in Development would give an advantage to those firms who specialize in systems development.</p>	<p>This certification has been removed.</p>	<p>Accreditation</p>
<p>Would the Government consider removing the mandate for Small Business contractors to have an accounting system audited and found acceptable by DCAA from the HCaTS SB RFP? This mandate is understood for the large business track, however, most small businesses do not have audited accounting systems.</p>	<p>Small businesses are not required to have an audited accounting system prior to award. All Offerors that are considered for award based on being in the Top 40 proposals per Pool will have the option to have their accounting system audited by DCAA. If an Offeror has an accounting system that was audited by the DCAA within the last three years and there have been no changes, their system will not need to be audited again. Only Offerors with audited accounting systems will be able to compete for cost-reimbursable type work at the task order level.</p>	<p>Accreditation</p>

<p>1. Page 26 of 144 . . . F.5 Performance Standards reads The Contractor shall maintain throughout the ordering period of HCaTS, at a minimum, the accreditations at time of contract award. For example, if a Contractor’s proposal included an acceptable accounting system and ISO 9001:2008 certification and made a part of contract award, then the Contractor shall maintain an acceptable accounting system and ISO 9001:2008 certification for the duration of the HCaTS ordering period.</p> <p>Comments/Suggestions: We recommend the statement be reworded accordingly . . . “The Contractor shall maintain or exceed throughout the ordering period of HCaTS, at a minimum, the accreditations at time of contract award. For example, if a Contractor’s proposal included an acceptable accounting system and ISO 9001:2008 certification and made a part of contract award, then the Contractor shall maintain an acceptable accounting system and ISO 9001:2008 certification for the duration of the HCaTS ordering period.” As the industry evolves, certain certifications are replaced or superseded by new certifications. Maintaining a certification in these cases may not be in the best interest of the government.</p>	<p>The RFP will be revised to reflect equivalency for successor certifications.</p>	<p>Accreditation</p>
<p>2. Page 26 of 144 . . . F.5 Performance Standards reads “An acceptable accounting system is mandatory for all Contractors. Compliance with the Cost Accounting Standards (CAS) are mandatory unless covered by exemption under 48 CFR 9903.201-1 and 48 CFR 9903.201-2. All other accreditations (i.e., certifications, clearances, systems) are optional;”</p> <p>Comments/Suggestions: While its reasonable to request compliance with CAS, it is unreasonable for the government to award evaluation points for optional systems when many of these systems can’t be certified by DCAA unless the government requires them. In other words, they should be optional systems and the government should not award evaluation points for them.</p>	<p>Your recommendation will be considered.</p>	<p>Accreditation</p>
<p>7. Pages 51 and 52 of 144 . . . H.6.2 Acceptable Estimating System, H.6.3 Acceptable Purchasing System, H.6.4 Forward Pricing Rate Agreements, H.6.5 Earned Value Management Systems.</p> <p>Comments/Suggestions: Training and Human Capital contracts are typically procured through Firm-Fixed Price (FFP) competitive bids. Therefore, these systems and Forward Pricing Rates are not needed. DCAA is the only body approving these systems and they only approve on an as needed basis. Additionally, they don’t have the capacity to certify these systems for every government contractor. We recommend removing any and all points associated with these certifications, as the government does not have the capacity to certify these systems.</p>	<p>Your recommendation will be considered.</p>	<p>Accreditation</p>

<p>8. Page 53 of 144 . . . H.6.6 CMMI Level Certification Comments/Suggestions: This certification is predominantly used in the manufacturing industry. While CMMI can be a beneficial certification to achieve, there has never been a requirement for CMMI for training and human capital services. We recommend lowering the certification level to II.</p>	<p>The CMMI certification will be removed from the RFP.</p>	<p>Accreditation</p>
<p>9. Page 53 of 144 . . . H.6.8 ISO 14001:2004 Certification Comments/Suggestions: This certification is irrelevant to this procurement. We recommend removing it from the solicitation or downgrading to a minimum level.</p>	<p>This accreditation has been removed.</p>	<p>Accreditation</p>
<p>Standard Form 1408 is labeled as 5 questions with sub-sections under each question (e.g., 2(a)) - The solicitation states "offeror is not required to answer questions 3 through 21" - does this refer to numbers 2-5 with all subsections? Is there an SF1408 with 21 questions labeled 1-21? If so, can GSA provide a copy or a link for contractors to access?</p>	<p>The final version of J.3 Pre-Award Survey will reflect the correct information.</p>	<p>Attachments</p>
<p>REFERENCE: Draft Section J.10 NAICS Code Re-Determination Form; Page 1 OFFEROR COMMENT/QUESTION: Discussion: On April 3, 2015, the Government issued Section J attachments to the Draft RFP which included Section J.10 "NAICS Code Re-Determination Form." This Form states: "Contracting Officers: You are receiving this form because the Offeror cited in Section I claims that the majority of the work performed on the contract or task order cited in Section II-A falls within one of the NAICS codes listed in Section II-E, and not the reported NAICS Code. The Human Capital and Training Solutions (HCaTS) team is asking that you, as duly warranted Contracting Officer of the contract or task order cited in Section II-A, certify that the scope of the contract or task order falls within one of the NAICS codes in Section II-E, and not the reported NAICS Code." The above statement appears to be asking the Contracting Officer to make a re-determination of the appropriate NAICS code for the work performed under the cited contract; an action which is not legally permissible. By regulation, the contracting officer is required to "determine the appropriate NAICS Code and related small business size standard and include them in solicitations." 48 C.F.R. ("FAR") 19.303(a)(1). Thus, the required time for determining the applicable NAICS Code is at the time of solicitation, 13 C.F.R. 121.402(b), not after contract award. The NAICS code assigned to a procurement, and its corresponding size standard, is final unless timely appealed to SBA's Office of Hearings and Appeals. FAR 19.303(c); 13 C.F.R. 121.402(d). Question: Are you asking the Contracting Officer to make a determination to CHANGE the NAICS from what was originally assigned?</p>	<p>Attachment J.10 NAICS Redetermination form will be amended in the final RFP to state that this redetermination is solely for the purposes of the evaluation of HCaTS and any redetermination will not require of the Contracting Officer to take any action or make any changes in the original contractual documents or how it was reported in PPIRS and FPDS-NG.</p>	<p>Attachments</p>
<p>J. 7 The Cost-Price Worksheet instructs "Editing or reformatting this sheet in any way is prohibited and will result in your worksheet not being reviewed" Would the government allow the offeror to edit the Cost-Price Worksheet in order for the offeror to comply with its accounting and estimating systems?</p>	<p>No, the Offeror must fit their cost elements into those provided into J.7 Cost/Price Worksheet.</p>	<p>Attachments</p>

<p>J.5.2 and Section H.6.1 states “Only those Contractors that maintain an acceptable accounting system, as approved by the HCaTS CO, shall be eligible for task order solicitations.” In addition, the Attachment J.5.2, Self Scoring Work Sheet requires contractors to state whether their accounting system has been audited. These statements may lead the reader to believe that contractors that have not been audited by DCAA may be barred from the award of task orders from this RFP. Or it may simply mean that said contractors will need to have their systems audited before an award can be made. Could the government please clarify this requirement? Will the government request the DCAA conduct an accounting system audit for those contractors that are not currently approved at the time of the proposal? Will the government provide contractors the time to go through this process with DCAA without penalty or discrimination?</p>	<p>All Offerors eligible and considered for award will have the option to have their accounting system audited by DCAA. Only Offerors with audited accounting systems will be able to compete for cost-reimbursable type work at the task order level.</p>	<p>Attachments</p>
<p>L.5.1.2 Attachment J.2 (Proposal Checklist) seems to be missing from the posted attachments. Can you please provide Attachment J.2 for Offerors to review?</p>	<p>The Final RFP will have this attachment included.</p>	<p>Attachments</p>
<p>J.5.2 and L.5.2.1 Column F does not calculate beyond row 16. Instructions to offerors on page 120 state that the sheet should auto-sum. Will the Government please provide an updated copy of Attachment J.5.2 Self Scoring Worksheet SB Pool 2 in which the auto-sum calculations are included?</p>	<p>The Self Scoring Worksheets (Attachments J.5.1 and J.5.2) were released in draft form and will be fully functioning when released with the RFP.</p>	<p>Attachments</p>
<p>L.5.2 This section states that “Additional instructions for filling out Relevant Experience Projects Template is found in Section J.5.3 (Self Scoring Worksheet SB (Sample)).” Attachment J.5.3 seems to be missing. Can you please provide Attachment J.5.3 for Offerors to review?</p>	<p>This will be released with the RFP.</p>	<p>Attachments</p>
<p>Attachment J7 states that “DCAA audited rates should be input” however the solicitation does not indicate that a DCAA audit is required prior to submission. Will the government clarify or remove the requirement for DCAA audit prior to submission?</p>	<p>All Offerors that are considered for award based on being in the Top 40 proposals per Pool will have the option to have their accounting system audited by DCAA. If an Offeror has an accounting system that was audited by the DCAA within the last three years and there have been no changes, their system will not need to be audited again. Only Offerors with audited accounting systems will be able to compete for cost-reimbursable type work at the task order level.</p>	<p>Attachments</p>
<p>Recommendation 4: Eliminate Estimating the Total Value of a KSA within J.5.1 and J.5.2 Scoring Sheets Within Attachments J.5.1 and J.5.2 there is a requirement to specify the total dollar value of the KSA and the total percentage associated with a KSA. We do not believe that this can be measured accurately nor do we believe that documentation exists that would allow a company to do more than give a general estimate of that value. Thus, the resulting value is neither objective nor reliable and can be whatever the estimator thinks best serves their purpose -- and therefore should not be collected nor evaluated.</p>	<p>This will be removed in the final RFP.</p>	<p>Attachments</p>
<p>On the pre-award survey, Section III question 4 – Can you define “full operation”?</p>	<p>Fully operational for a commercial accounting system means that the Offerors accounting system is able to handle all contract types and generating inputs and outputs, and all components of the accounting systems are operational.</p>	<p>Attachments</p>

On the pre-award survey, Section III – what information is required to “validate” an answer in section 3?	Each question in Section III states what form of substantiation is required for an affirmative response.	Attachments
The modified Pre-Award Survey Comment box has a limited field capacity (75 characters). Is this intentional?	This will be amended in the final RFP.	Attachments
L.5.5 “The Offeror shall propose ceiling rates for T&M/L-H task orders by completing Columns H through V of the Cost/Price Worksheet.” The Cost/Price Worksheets only include Columns H through N. Please correct either spreadsheet or instructions.	The instructions will be amended in the final RFP.	Attachments
J.3 Preaward Survey SF 1408 HCaTS v.01 The form, in its current state, cannot be edited and the comment sections on the form aren’t large enough to accommodate our responses. We suggest the government make the form editable and/or increase the size of the comment sections so that we can enter sufficient responses.	The comment sizes will be increased in the final version.	Attachments
J.6 Past Performance Substitute HCaTS v.01 The form, in its current state, requires the contracting officer to admit to incorrectly assigning the original NAICS code. We suggest that GSA change the form to allow the contracting officer to state what NAICS code “could” have been selected rather than “should” have been selected.	The language in the final J.10 will be amended to state that the NAICS Code determination is solely for evaluation purposes for HCaTS and does not change any official contractual documents nor reports.	Attachments
Attachments J.5.1 and J.5.2, Self Scoring Sheets. We recommend that the requirement of the submission of the Self-Scoring sheets as a part of the proposal be removed. Contractors cannot be impartial when scoring themselves, and will likely try to apply various techniques and schemes to skew their point values upward, exploiting any unintentional loopholes that might exist in the forms. The Self-Scoring sheets seem like an extra paperwork burden of limited value, because all respondents will be averse to rating themselves negatively, even when they are well aware of their own weaknesses. The presence of such Self-Scoring sheets also unintentionally implies that the proposal review staff lacks credibility or accuracy, and therefore their assessments need to be cross-checked. This in turn could undermine industry confidence in the review team and generate additional unforeseen problems.	The RFP states "in the event the Government discovers misleading, falsified, and/or fraudulent Relevant Experience Project information, documents, statements, and/or claimed points in Section J.5.1 (Self Scoring Worksheet Pool 1) and/or J.5.2 (Self Scoring Worksheet Pool 2), the Offeror shall be eliminated from further consideration for award." The Self-Scoring Sheets will be validated by the Government by the supporting documents submitted and needs to be included in the proposal. All scoring elements must be substantiated by the Offeror with supporting contractual documents.	Attachments
Page 123 of the RFP: L.5.2.3.5 Relevant Experience project Period of Performance. “For each Relevant Experience Project submitted, the Offeror will receive additional points if the period of performance meets or exceeds the following:...”On the self-scoring worksheet it states, “These values are only for the portion of the project that is contained on the PPIRS or Past Performance Substitute Form. If the project is only partially completed, then the duration and total value should reflect that.” Despite the instructions, the self-score worksheet implies that you can only claim credit for the months already exercised. This seems to give an advantage to work that has expired or is near expiration, versus work that is ongoing. It would also give an advantage to contractors who extended their period of performance via protest. Would the government consider awarding the points to projects (IF they are on-going) for the entire period of performance and disqualify any portion of the project that was extended by bridge or protest?	The current methodology treats value and duration equitably. Offerors are permitted to take credit for all work that they have performed, regardless of when the work was performed so long as some portion of the period of performance, including the base and any option periods, falls within the last five years from when the RFP closes. The Self Scoring Sheet (Attachments J5.1 and J.5.2) will be corrected in the RFP to not require those elements be validated by the PPIRS or J.6 Past Performance Substitute Form. Only the Contractual Documents may be used to validate the scoring elements in the Relevant Experience Project that were previously marked as solely for the PPIRS or J.6 Past Performance Substitute Form.	Attachments

<p>Attachment J.10 details how to correct an incorrect NAICS code for relevant projects. In some instances, a NAICS code was never assigned to a federal project. Should we still use the same form and just put "N/A" or equivalent in the box in Section II, letter c, and request that the Contracting Officer identify the correct NAICS code?</p>	<p>Yes. The RFP lists several sources of substantiating the NAICS Code of the Relevant Experience Project. If none of these have an identified NAICS Code, then J.10 NAICS Code Confirmation Form may be used and the Contracting Officer will list the awarded NAICS Code as "none".</p>	<p>Attachments</p>
<p>J.6 Past Performance Substitute Form: J.6 Past Performance Substitute Form, Item a. (Contract Number/Project Number) asks for the "Contract number or Project number that you are evaluating." Some of our clients use internal agency project numbers to identify projects. These may or may not correspond with the PIID number that is coded into FPDS for the project. Is it acceptable for the client to use the internal project number they have assigned the project, or do we need to direct them to use the corresponding FPDS PIID number? The text field provided for "k. Contract Effort Description" is only 94 characters in length. We do not feel that we can adequately describe our contract effort in this limited amount of space. Could the Government provide additional space for the description? (Preferably 300 characters or more.)</p>	<p>When using FPDS-NG to substantiate a NAICS Code, the Offeror shall submit enough information to substantiate that the contractual document's contract/task order/project number relate to what is included in the FPDS-NG report.</p>	<p>Attachments</p>
<p>We have a scenario in which we have a uniquely qualified Relevant Experience Project where the Prime Contractor is unreachable and no longer available to complete the Substitute Form. However, we do maintain contact with the Govt. Contracting Officer and the Contracting Officer's Technical Representative.</p>	<p>All past performance information for Relevant Experience Projects shall be completed by someone authorized to rate the performance of the Offeror. Since the Government does not have privity to the contract between the Prime Contractor and the Subcontractor, the Government cannot rate the past performance of the Subcontractor.</p>	<p>Attachments</p>
<p>How will the assessment or handling of the potential appearance of a conflict of interest where competing offerors may be evaluating each other?</p>	<p>HCaTS team recognizes Prime Contractors are not required to rate their Subcontractors and complete the J.6 Past Performance Substitute Form, and First-Tier Subcontractors need to prepare for that event. First-Tier Subcontractors will make a business decision whether or not to submit their past performance rating(s) with their proposals. With that said, GSA believes Prime Contractors will be incentivized to fairly rate their First-Tier Subcontractors to maintain their relationship for future work. Since the Government does not have privity to the First-Tier Subcontractors, it would not be appropriate for the Government to rate the First-Tier Subcontractor.</p>	<p>Attachments</p>
<p>What happens if the performance rating for the First-Tier subcontractor is different than the performance rating assigned by the government to the federal prime contractor?</p>	<p>GSA is only evaluating the past performance information of the Offeror and will not consider the past performance information of another entity; therefore, it will not matter if the Prime Contractor's past performance rating differs from the past performance rating of the First-Tier Subcontractor.</p>	<p>Attachments</p>

<p>Page 93, Section L.2.4 indicates that there will be 40 awards in each pool. Are these 40 small business awards, or a combination of 40 large and small business awards?</p>	<p>Both contract vehicles, Unrestricted and Small Bussiness, will have 40 contract awards per Pool. This is a total of 160 awards. The Small Business Contract Vehicle is set-aside for small business;therefore, all 80 awards will go to small businesses. Any business size is allowed to apply on the Unrestricted Contract Vehicle; therefore, the 80 awards could be made up of both small and large businesses.</p>	<p>Awards</p>
<p>REFERENCE:Unrestricted DRFP, Page 92, Section L.2.4 Single or Multiple Awards. 1) Pool 1; 2) Pool 2. OFFEROR COMMENT/QUESTION: For each pool listing, it states: "Maximum Number of Multiple Awards: 40" Is this 40 for the Unrestricted contract only?</p>	<p>Both contract vehicles, Unrestricted and Small Bussiness, will have 40 contract awards per Pool. This is a total of 160 awards. The Small Business Contract Vehicle is set-aside for small business;therefore, all 80 awards will go to small businesses. Any business size is allowed to apply on the Unrestricted Contract Vehicle; therefore, the 80 awards could be made up of both small and large businesses.</p>	<p>Awards</p>
<p>REFERENCE: Unrestricted DRFP, Page 62, Section H.19 OFFEROR COMMENT/QUESTION: Solicitation states that "the Contractor shall attain a minimum of three task order awards or a total task order estimated value of \$1.5M prior to the exercise of Option I. Failure...may result in a Contractor being Off-Ramped." Would the Government consider an alternative metric based on the number of proposals submitted over time, for example six submissions prior to Option I? Shouldn't the goal of using this contract be to encourage companies to submit quality proposals over time without potentially reducing the pool of qualified companies?</p>	<p>The RFP will be amended to include language allowing Contractors to substantiate a good faith effort in responding to solicitations solicited under their respective Pool(s).</p>	<p>Awards</p>
<p>G.2.6 This is a clarification with regards to section G.2.6 and if there will be 1 awarded contract, or 2 (one for each pool). Based on that clarification it is our assumption that if 2 contracts are awarded, there is no need to have 2 key personnel per contract; only 1 PM and 1 CM for the overall IDIQ; however, (see recommendation on line 6) large business only needs one contract total.</p>	<p>If an Offeror submits one proposal for both Pools, the Offeror will be awarded two separate contracts provided that they win awards in both Pools.</p>	<p>Awards</p>
<p>In section I.2.3.4, it states that, "The Government may require continued performance of any services within the limits and at the rates specified in the contract. These rates may be adjusted only as a result of revisions to prevailing labor rates provided by the Secretary of Labor." Earlier in the DRFP you mentioned adjustments to labor rates based on the employment cost index (ECI). Do you consider prevailing labor rates and the ECI to refer to the same criterion for adjusting labor rates under HCaTS?</p>	<p>Yes</p>	<p>Awards</p>
<p>H.23.2 7. Is the "lowest scoring contractor" the contractor that scored lowest of all HCaTS awardees in the original HCaTS competition?</p>	<p>Yes</p>	<p>Awards</p>

<p>FAR 15.304(c)(1) requires that price or cost “shall be evaluated” in a best value procurement. The RFP merely requires the Agency to determine a price is “fair and reasonable,” which is an independent determination that an agency must make. See FAR 15.402(a). The RFP provides that awards will be made to the highest technically-rated proposals with fair and reasonable pricing. Doesn’t this evaluation scheme violate the requirement that price/cost serve as an evaluation factor?</p>	<p>Price can be evaluated and considered fair and reasonable in many different ways. By providing all Offerors with a pre-determined direct labor rate range of acceptability for each labor category, Offerors need to submit for evaluation their direct and indirect costs as per their accounting system. If a cost element exceeds any of the thresholds prescribed in the RFP, an Offeror is also permitted to submit a justification for our consideration. Therefore, all proposals considered for award will have their fully burdened rates evaluated and considered fair and reasonable to be eligible for award.</p>	<p>Awards</p>
<p>Section F.5.1, Deliverable and Reporting Requirements. We do not object to any of the compliance measures themselves; however, there is some redundancy and duplication of effort imposed on industry by requiring HCaTS SB Contractors to both certify and update compliance data in existing government databases (such as the Department of Labor VETS-100 compliance database/web portal, as only one example out of more than a dozen), and then email duplicate copies of these same certifications and records to hcats@gsa.gov (or, alternatively, manually upload the items to the HCaTS SB Management Module (HMM)). Rather than requiring this duplication of effort, which creates an additional regulatory burden on small businesses, we recommend that software interfaces be developed to allow the HMM to access these other Government systems to automatically collect the existing compliance data. Please note that the SBA recently found that “small businesses bear a larger burden from regulations than large businesses.” Therefore, any efforts the HCaTS team could make towards streamlining the regulatory compliance processes associated with HCaTS SB would be greatly appreciated by industry and would help control industry’s regulatory compliance costs. (Contractors must pay their staff members for the time it takes to manually input these duplicative documents and certifications into the HMM and to email these duplicative documents to the HCaTS program management office, so automating these tasks by building bridges between the HMM and other Government databases is recommended.)</p>	<p>As our IT infrastructure evolves, the contracts will be modified changing the need to update in multiple systems.</p>	<p>Awards</p>
<p>Section G.5, Option Determination. We recommend the last sentence in the first paragraph be changed slightly to read “If necessary, the HCaTS PMO has also included one six-month option to extend the initial ordering period of HCaTS SB contracts.” Adding the word “initial” in this way clarifies that the six-month extension applies to the initial ordering year, and does not constitute an Option 1 period.</p>	<p>This recommendation was considered and the RFP will not be amended.</p>	<p>Awards</p>

Section H.19, Minimum Task Order Awards or Estimated Value. Much like with the GSA Multiple Awards Schedules, participation on HCaTS SB requires intensive self-marketing, with no guarantee of success; therefore, it seems like the minimum task order award amounts / estimated value of awards required to avoid being Off-Ramped from HCaTS is a bit onerous for small businesses, particularly disadvantaged ones. The GSA Multiple Awards Schedule program requires a minimum of \$25,000 in contracts during the initial contract year to remain active on Schedule; this seems like a better financial metric or milestone for gauging the performance of small business on HCaTS SB to prevent dormancy status or Off-Ramping.	The RFP will be amended to include language allowing Contractors to substantiate a good faith effort in responding to solicitations solicited under their respective Pool(s).	Awards
G.3.1 We believe an excessive CAF outside that of current similarly structured IDIQs (e.g., GSA Alliant and OASIS) will limit the use of HCaTS. Is there a proposed range or not-to-exceed cap to the CAF, and if yes, will the Government provide it?	The RFP will be amended to include the CAF once it is agreed and decided upon.	CAF
Section B.1.8, paragraph one, states, "GSA and OPM operating costs associated with the management and administration of HCaTS are recovered through a CAF." Does this cost get passed along to the federal client seeking services, or to the contractor providing them?	The Contract Access Fee (CAF) is passed along to the Federal customer.	CAF
B.1.8 and G.3.1 For large task orders, will the government consider a CAF cap? Justification/Reason/Explanation: A CAF cap has been introduced on several other large Federal IDIQs and has proven to encourage greater participation by all agencies, increase the IDIQ's competitiveness with the CAFs of other agencies/vehicles, and overall, enhance the marketability of the IDIQ contract.	The Contractor Access Fee has not yet been established, but several methods are being considered.	CAF
Section B.1.8, Contract Access Fee. To reduce the regulatory burden on OPM/GSA and industry alike, rather than calculating and monitoring varying Contract Access Fee amounts, can the Government simply set one fixed percentage rate for the CAF, much as the Industrial Funding Fee (IFF) for the GSA Multiple Award Schedules (MAS) program is fixed at 0.0075 of contract value?	The CAF has not yet been determined.	CAF
What fees will apply under HCaTS?	The Contract Access Fee has not yet been determined.	CAF
Section L.5.4.14 indicates the Contractor's Key Personnel for Contracts Manager provide verification that they have a Certified Professional Contracts Manager (CPCM). Would the government consider equivalency language to indicate either years of experience or a Certificate in Procurement and Contracts Management from the University of Virginia (or similar University) which is recognized by the National Contract Management Association (NCMA)?	We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.	Certifications
Page 143, Section M.7. There are no indicated points for the Contract Manager certifications.	We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide	Certifications
Page 142, Item L.5.4.9, we suggest that in addition to providing points for advanced degrees for Human Capital/Resources and ISD, that points also be awarded for advanced degrees in Organizational Development or Industrial/Organizational Psychology.	We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.	Certifications

CMMI Level 3 is more relevant to IT or Software Development programs and not Human Capital programs. Would the government consider removing this as a scoring element?	The CMMI certification will be removed from the RFP.	Certifications
In this section of the draft RFP, under Compliance Table Item H.6.14, the table requires that the Certified Professional Contracts Manager (CPCM) maintain their Human Capital and Human Resources Certification. We believe that it should state that they maintain their CPCM. Please confirm.	We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.	Certifications
Will the government consider a PhD in a scientific discipline addressing human learning, e.g., Cognitive Psychology, as a substitute for a degree in Instructional Systems Design?	We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.	Certifications
Will the government consider a minimum of 3-years of full-time university-level teaching experience as a substitute for CPLP certification?	We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.	Certifications
Section H states, "The Council created a directory of accredited Six Sigma providers that is available at the Council's website at www.sixsigmacouncil.org/ . L.5.4.10 states, "Verification requirements include a copy of the Offeror's Six Sigma Black Belt Certification from an International Association for Six Sigma Certification accredited provider." Please confirm that certifications from organizations accredited by the International Association for Six Sigma Certification, but not listed on the Council's website, meet the HCaTS requirements.	We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.	Certifications
Will the government consider a PhD in a scientific discipline addressing human and/or organizational behavior, e.g., Cognitive Psychology, as a substitute for an advanced degree in Human Capital or Human Resources?	We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.	Certifications
This section of the draft RFP states that one scoring element is ISO 14001:2004. Would the government remove ISO 14001:2004 from the scoring table, since certification for an Environmental Management System does not apply to the HCaTs scope of work or KSAs?	Yes, the Final RFP will have this scoring element removed.	Certifications
Please confirm that the scoring of the certifications in sections L.5.4.9 through L.5.4.14 is relevant to the two key personnel, the Corporate HCaTS Program Manager (CHPM) and Corporate HCaTS Contract Manager (CHCM). Given L.5.4.14 applies to the Corporate HCaTS Contract Manager (CHCM), confirm that these points will be granted for this sole individual. Similarly, L.5.4.9 through L.5.4.13 apply to the Corporate HCaTS Program Manager (CHPM) and thus points will be granted for this single individual.	We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.	Certifications
Would the Government consider adding points for a Certified Federal Contracts Management (CFCM) certification in addition to the CPCM?	We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.	Certifications
If additional points are given for key personnel having a degree in human capital management or human resources, doesn't it make equal sense also for the contracts manager key personnel to be awarded points for having a degree in accounting, finance, or an MBA?	We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.	Certifications
Will the (40) in each pool make-up companies or individual within the companies?	Contracts will be awarded to the companies that submitted the selected proposals under their respective DUNS Number.	Contract Vehicles

<p>Please provide clarification on the contractual mechanism. Specifically, please explain how is this vehicle going to be implemented as there is mentioned in the draft solicitation of various types of contracts types.</p>	<p>All contracts will be awarded as Fixed Price with Economic Price Adjustment (EPA). Ordering Contracting Officers are permitted to award any type of contract at the task order level in accordance with the FAR and their agency supplement to the FAR.</p>	<p>Contract Vehicles</p>
<p>Since most of the applicable training NAICs codes are applicable to small business entities, please indicate how training activities are going to be assigned to large businesses and on what basis?</p>	<p>Based on the results of market research, Ordering Contracting Officers will choose the appropriate contract vehicle and Pool(s) that meet the requirements of their specific acquisition.</p>	<p>Contract Vehicles</p>
<p>(Section M.6.3), p. 140 How can a large firm compete for Pool 1 or Pool 2 with the respective size standards?</p>	<p>Under the Set-Aside Contract Vehicle, no other than small business concern can submit a proposal for consideration. Under the Unrestricted Contract Vehicle, an Offeror can be either a small business or other than small business, depending on their business size under each Pool.</p>	<p>Contract Vehicles</p>
<p>Is it correct to assume that offerors should propose 2 key personnel (a program manager and a contracts manager), regardless of whether an offeror is proposing in Pool 1, Pool 2, or both pools?</p>	<p>Offerors may choose to submit two separate Contractor Key Personnel per Pool or use the same Contractor Key Personnel for both.</p>	<p>Contractor Key Personnel</p>
<p>Sections H.6.9 – H.6.14 encourage key personnel to have various certifications throughout the life of the contract. Does the Government intend for ALL key personnel to achieve and maintain ALL of these certifications or is it the intention that each of the two key personnel maintain the pertinent certifications. Would the government consider specifying the required or desired certifications for the Corporate HCaTS Contract Manager separately from those for the Corporate HCaTS Program Manager?</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>Will the government consider equivalent degrees and certifications? For instance, would the government consider a degree in Applied Behavioral Sciences equivalent to a Human Capital/ Human Resources degree and a Leadership Coaching Certificate from recognized institutions such as Georgetown University as an acceptable coaching certificate?</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>REFERENCE: Unrestricted DRFP, Page 143, Section M.7, Table entry L.5.4.14 OFFEROR COMMENT/QUESTION: There are no point values listed for contract professionals in the Unrestricted Solicitation, but they are listed in the Small Business Solicitation. What are the point values associated with this table entry in the Unrestricted Solicitation?</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>Will the 2 key personnel (Corporate HCaTS Program Manager (CHPM) and Corporate HCaTS Contract Manager (CHCM)) be the only ones to gain points for having certifications referenced on pages 128-129.</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>Can you confirm that there are only 2 key personnel- Corporate HCaTS Program Manager (CHPM) and Corporate HCaTS Contract Manager (CHCM).</p>	<p>Correct, there are only two Contractor Key Personnel.</p>	<p>Contractor Key Personnel</p>
<p>L.5.4.9 Key Staff Degree in Instructional Systems Design (ISD). Would a Masters degree in Education/Curriculum & Instruction count as an Instructional Systems Design (ISD) degree. ISD is a relatively recent term and is not used by education graduate schools.</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>

<p>H.6.9-13 The Program Manager at the IDIQ level is primarily responsible for the proper use, dissemination, and overall management of the vehicle, from the Offeror's perspective. The Program Manager is rarely directly responsible for execution of individual task orders. The preferred qualifications listed in Sections H6.9 – H 6.13 are much more appropriate for Task Order leads than for the IDIQ PM. Since Task Order leads are not key personnel for the IDIQ, recommend eliminating the additional scoring points for qualifications held by the IDIQ PM. If the HCaTS team feels additional qualifications for the IDIQ PM are essential, we suggest that H6.11 Project Management Professional (PMP) is the most relevant to the job of the IDIQ PM.</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>L.5.4.9/10/11/12/13/14 stipulate that, "The Offeror shall only receive credit for a maximum of one certification or degree per Contractor Key Personnel." DAI requests clarification as to whether the limitation on certifications is one certification within each category identified, or one certification (total) for each key person. (An individual identified as a key person for HCaTS may indeed have more than one of the listed certifications.</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>G.2.6 The technical skills and professional qualifications/certifications associated with the Pool 1 and Pool 2 NAICS codes are significantly different. Given this and the CHPM senior, high-level program management duties outlined in Section G.2.6.1, it seems appropriate and prudent for contractors to assign a Corporate HCaTS SB Program Manager (CHPM) for each of the identified MA-IDIQ Pools for which it is competing. DAI strongly recommends the definition of Contractor Key Personnel contained in Section G.2.6 be revised to include a Corporate HCaTS SB Program Manager (CHPM) for each of the identified MA-IDIQ Pools for which a contractor is competing.</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations. If an Offeror is applying under both Pools, the same Contractor Key Personnel can be used and the Offeror need naught submit two separate Contract Managers and two separate Program Managers.</p>	<p>Contractor Key Personnel</p>
<p>G.2.6.1-G.2.6.2, H.6.9-H.6.14, L.5.4.9-L.5.4.14 We recommend the Government consider removing the human capital and training-related certification requirements for the key personnel more appropriate to task order performance. We support leaving intact related program management and contract certifications directly relevant to the successful operation of the HCaTS PMO.</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>G.2.6 Will the Government please confirm that the prohibition against billing for Contractor Key Personnel applies only to the CHPM and CHCM, and not to any additional key personnel that may be designated at the task order level?</p>	<p>The prohibition against billing for the CHPM and CHCM only applies at the contract level. Contractors are permitted to propose any labor category and rate at the task order level for the Ordering Contracting Officer's consideration.</p>	<p>Contractor Key Personnel</p>
<p>Section L.5.4.9, paragraphs two and three, states, "Verification requirements include a copy of the Offeror's (CPLP) Certification from the Association for Talent Development (ATD) or Bachelor's Degree or higher in Instructional Systems Design (ISD) from an accredited university or college...The Offeror shall only receive credit for a maximum of one certification or degree per Contractor Key Personnel." Does this apply to only to the two Contractor key personnel listed in the Draft RFP or can anyone on the proposed team possess these certifications?</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>

<p>H.6.14, paragraph 1: The intent of the preference for key personnel with contract management certifications is not clear. We request that the HCATS PMO clarify if this competency is required for individuals delivering services to the government customer or for staff who support the company's contract management functions</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>H.6.13, para 5: We recommend that the preference for key personnel with degrees in human capital and human resources be expanded to include other degrees in relevant fields of study. The preference for key personnel with Bachelor's degrees in human capital or human resources does not encompass the full scope of degrees relevant to HCaTS KSAs. For example, degrees in industrial psychology and organizational development would be directly applicable to the scope of work referenced in the DRFP. Additionally, degrees related to the training component of HCaTS (e.g., Bachelor's or post graduate degrees in Education) are not adequately accounted for.</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>L.5.4.9 - L.5.4.14 and M.7 - H.6.9 - H. Corporate HCaTS Program Manager (CHPM) and Corporate HCaTS Contract Manager (CHCM): The duties and requirements as outlined in G.2.6.1 and G.2.6.2 are reasonable and consistent with those for similar positions on Governmentwide contracts. Sections L.5.4.9, L.5.4.10, L.5.4.11, L.5.4.12, L.5.4.13, and L.5.4.14, however, add language indicating that "it is encouraged" that these CHPMs/CHCMs have a Certified Professional in Learning and Performance (CPL) Certification, a Six Sigma Black Belt Certification, a Project Management Professional (PMP) Certification, Coaching Certifications, Human Capital and Human Resources Certifications and Degrees, or Certified Professional Contracts Manager (CPCM), Industry Certification in Contract Management - Defense (ICCM-D) or Industry Certification in Contract Management - Federal (ICCM-F) Certification, respectively. The scoring under M.7 adds additional points for these accreditations. This additional language in Section L and scoring in Section M overemphasizes the value of specific degrees and certifications as they relate to the ability to manage a vehicle such as HCaTS. Most of these would more appropriately be applied at the task order level. This may have unintended consequences-- taking the focus away from capability and experience. It would be anticipated that in order to gain additional points, Offerors would seek out individuals to propose for these positions solely based on the fact that they have specific degrees or certifications--not the most qualified to manage this IDIQ contract. These additional degrees/certifications are not indicators of potential success as a CHPM or CHCM. It is believed that GSA is seeking individuals that will be truly engaged in managing this vehicle. The use of evaluation points should bring genuine value to HCaTS, not be utilized simply as a method to include an additional means to score. It is requested that GSA delete the language in L.5.4.9 through L.5.4.14 and further H.6.9 through H.6.14 - encouraging specific degrees and certifications. It is further requested that the additional points noted for these items in M.7 be eliminated. Once eliminated, the RFP language would reflect the language ultimately included in the OASIS contracts (where there were similar objections).</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>

<p>G.2.6 This clause clearly states that there are no minimum qualification requirements established for Contractor Key Personnel. Accordingly, it is requested that the 4th paragraph under G.2.6 be amended to read: "The Contractor shall ensure that the HCaTS CO has current point-of-contact information for both the CHPM and CHCM. In the event of a change to Contractor Key Personnel, the Contractor shall notify the HCaTS CO and provide all Point-of-Contact information for the new Key Personnel within 5 calendar days of the change." This amended language is in conjunction with a request to delete the requirements under H.6.9, H.6.10, H.6.11, H.6.12, H.6.13, and H.6.14.</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>We believe the certification requirements for the Corporate Program Manager and the Corporate Contracts Manager are excessive based on their respective roles:</p> <ul style="list-style-type: none"> · As our experience with OASIS has shown, the Corporate Program Manager role is intensively focused on managing and promoting the vehicle itself. This role is not necessarily involved in the service delivery associated with a particular task order. The current certifications required for this position far exceed the actual requirements to successfully manage and promote this vehicle. · For the Corporate Contracts Manager role, the person most qualified to fill this role is our OASIS Contracts Manager because she is already familiar with the unique structure of the two vehicles and their similar reporting requirements. However, she doesn't have a background in human capital/training and under the current scoring system, we would forego points if we proposed her. We recommend reducing the proportion on points allocated to key personnel. For example, the Corporate HCaTS Program Manager and Corporate HCaTS Contract Manager could be credited for one or two certifications rather than up to six, as is currently presented in the draft scoresheet. This way, we believe the HCaTS team will get personnel better suited to the underlying CHPM and CHCM roles. It can be left to the customers to decide what skills they need for service-delivery on a task order-by-task order basis. 	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>Add labor categories that reflect the level of expertise and credentials needed to carry out high-level Human Capital programs envisioned under HCaTS, specifically adding labor categories that require postgraduate degrees in relevant fields, specifically including Ph.D.'s in industrial/organizational psychology and M.A./M.Ed.'s in instructional design.</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>Evaluate this category based on the past performance of the key personnel and their educational experience.</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>

<p>G.2.6 We strongly recommend that the Government use relevant human capital and training experience criteria (currently not included) in lieu of extensive certifications as the key determinant to evaluate whether Contractor Key Personnel have the requisite professional experience and education in the KSAs to qualify for a position at the IDIQ level. This would significantly reduce the Government's risk of offerors submitting key personnel who may be highly certified to score additional points, but lack true human capital and training expertise and proven abilities to manage the master contract. We recommend that the extensive certification requirements be applied at the Task Order level.</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>M.7 , L.5.4.14 There are no point values listed for contract professionals in the Unrestricted Solicitation, but they are listed in the Small Business Solicitation. What are the point values associated with this table entry in the Unrestricted Solicitation?</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>G.2.6.1, G.2.6.2 We believe that the additional points given for key personnel with the certifications for CPLP, ISD, Six Sigma Black Belt, PMP, Coaching, Human Capital and HR, CPCM and ICCM-D & ICCM-F incentivize contractors to propose key personnel that maximize evaluation points versus proposing key personnel with significant experience with large multiple award IDIQs. The additional qualifications may be more appropriate for a specific task. Therefore, would the Government consider the credit for CPLP, ISD, Six Sigma Black Belt, PMP, Coaching, Human Capital and HR, CPCM and ICCM-D & ICCM-F for key personnel be removed at the contract level and allow agencies the flexibility to add these requirements at the task order level?</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>Section L.5.4.13 (page 132) asks for human capital certifications. Please confirm that we can claim this certification by submitting the appropriate evidence for a key person having a Ph.D. in industrial/organizational psychology.</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>We strongly believe that the key staff requirements should focus on experience rather than on credentials. Based on the scoring sheet in section M, it appears that it is the government's goal is to have a Contractor identify a single employee as CPHM who has as many of the certifications as possible, rather than any experience directing projects or managing large contract vehicles. We would argue strongly that the certifications in section H.6 and elsewhere in the DRFP (e.g., CPLP, ISD, Six Sigma, coaching) are not universally relevant to HR, human capital, and training and development work. We recommend that they be removed from the overall contract level. Agencies should have the flexibility to add such requirements when they are relevant to specific HCaTS task orders.</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>We believe that credit should also be given for a degree in industrial/organizational psychology and other related degrees in addition to an HR or HC degree. As the draft RFP notes in C.1.1 Key Service Areas, "OPM's experience is that customers have requirements that require solutions drawing from many different disciplines of study and areas of expertise." At a minimum, we suggest you add the words "or in a highly related field of study" to the rating template and give equal points to degrees in fields that are relevant to work that will be performed via HCaTS.</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>

<p>In section F.5.1 (Deliverable and Reporting Requirements) within the table in rows H.6.9 through H.6.14, do these refer only to changes in key personnel? That is, do they mean that within 15 days of substitution, or a change, in key personnel, a contractor needs to notify GSA of the certifications of the new key personnel?</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>Do you mean for the table in section B.2.1 to apply to key personnel (as defined in sect. G.2.6), such that if key personnel have 20 years of relevant work experience that is an equivalent substitution for a doctorate? Will key personnel be given the same points for the years of experience as for the certification or degree?</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>G.2.6.1 Specialized certifications and degrees for CHPMs on large MA-IDIQs are highly unusual, and in this case, don't closely align with the CHPM duties in G.2.6.1. Specialized degrees and certifications for key staff are appropriate at, and should be tailored for, individual task orders. However, providing extra evaluation points for specialized certifications and degrees for the IDIQ incentivizes offerors to propose a CHPM that maximizes evaluation points rather than a CHPM with experience managing large MA-IDIQs. Will the government consider removing all extra evaluation points for specialized certifications and degrees for the CHPM? If the government provides extra evaluation points for the specialized certifications listed above, it risks placing importance on and measuring factors that are not relevant to a CHPMs ability to successfully manage the HCaTS program. The government will miss out on pool of highly valued professionals that have the equivalent, or better, of such certifications in years of business experience and direct experience managing large IDIQs, and their ability to add, or continue to add, substantial value to GSA, OPM, and our mutual customers. We recommend the government encourage certain certifications and degrees only at the task order level if relevant for a specific customer requirement.</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>G.2.6.2 and H.6.9-13 These specialized certifications and degrees for CHCMs on large MA-IDIQs are highly unusual, and in this case, don't closely align with the CHCM duties in G.2.6.2. Providing extra evaluation points for these specialized certifications and degrees for the CHCM incentivizes offerors to propose a CHCM that maximizes evaluation points rather than a CHCM with experience managing large MA-IDIQs. Will the government consider removing all extra evaluation points for these specialized certifications and degrees for the CHCM? Justification/Reason/Explanation: If the government provides extra evaluation points for the specialized certifications listed above, it risks placing importance on and measuring factors that are not relevant to a CHCMs ability to successfully manage the HCaTS program. The government will miss out on pool of highly valued contract management professionals that have the experience managing large IDIQ.</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>L.4.1 Are the requirements in Volume 4, L.5.4.14 (CPCM, ICCM-D Level III, or ICCM-F Level II Certificate) required or desired? Unlike the other requirements in Volume 4, the wording of, "If applicable" is missing at end of the title.</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>

<p>What is the total number of Key Personnel that an Offeror can put forward to meet the certifications listed on pages 146-147?</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>Recommendation 1: Eliminate Points Allocated for Key Personnel We found the rationale for allocating points to Key Personnel to be somewhat confusing and contradictory. Our understanding is that allocating points for Key Personnel implies that the government believes that Key Personnel with certifications will be more qualified to manage a large Indefinite Delivery Indefinite Quantity (IDIQ) and that it will also create another objective discriminator to ensure that the most highly qualified companies receive awards. Section L indicates that additional points will be given if the Program Manager and the Contract Office hold certain certifications. Key personnel are given points for:</p> <ul style="list-style-type: none"> • Certified Professional in Learning and Performance (CPLP) • Degree in Instructional systems Design (ISD) • Black Belt Certification • Project Management Professional (PMP) Certification • Coaching Certification • Human Capital or Human Resources Certification • Degree in Human Capital or Human Resources • Certified Professional Contracts Manager • Industrial Certification in Contract Management-Defense Level III • Industry Certification in Contract Management Federal Level III • Certified Professional Contract Manager 	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>

<p>The awarding of points for certifications seems to run counter to the requirement stated in Section G.2.6 which is “There is no minimum qualification requirements established for Contractor Key Personnel. Additionally, Contractor Key Personnel do not have to be full-time positions; however, the Contractor Key Personnel are expected to be fully proficient in the performance of their duties.” We see several pitfalls with this approach. First the role of the key personnel as defined in the draft RFP is to serve as the “primary points-of-contact to resolve issues, perform administrative duties, and other functions that may arise relating to HCaTS contracts and task orders solicited and awarded under HCaTS contracts.” A secondary role not explicitly stated is to support GSA and OPM in driving client work to this contract. The fact that an individual has the certifications listed above does not demonstrate or imply that the individual has any experience in resolving IDIQ issues or performing IDIQ administrative duties – or has any meaningful experience whatsoever in managing large IDIQs. The certifications specify either functional/technical competence (e.g., in Instructional System Design, or Human Capital), or academic training in Contracts Management – but not successful large IDIQ contract management experience in either case. We believe that individuals with relevant functional/technical certifications (e.g., Six Sigma Black Belt, Coaching, etc.) are more valuable to clients if deployed to perform task orders, develop solutions that address client challenges and ensure deliverables are of high-quality. Analogously, individuals with certifications in contract management might be able to effectively perform as IDIQ managers – but relevant certifications alone, absent demonstrated successful experience, does not offer the Government the certainty that we believe is required in the critical roles defined for Key Personnel.</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>Second, it would be possible to assign an individual with several of these certifications as Key Personnel for the sole purpose of scoring points. The proposed individual would serve as just a “figure head”, but not be truly responsible for performing most of the duties required for managing this IDIQ after award.</p> <p>Third, assume an individual proposed as Key Personnel holds multiple certifications and the company is awarded a contract over another bidder where the Key Personnel points were the deciding factor. Then suppose that specific individual leaves the successful bidder and that company is unable to replace their Key Personnel with another holding similar multiple certifications as required in Section G.2.6. “The Contractor shall maintain throughout the ordering period of HCaTS, at a minimum, the accreditations at time of contract award for all Contractor Key Personnel.” Will that company then lose their award and another company be given an award to replace it?</p> <p>We recommend that points not be allocated for Key Personnel certifications because the certifications are not an objective evaluation factor for determining if Key Personnel are qualified to manage a large IDIQ. Our second recommendation offers a more viable and effective means to measure a company’s ability to manage large IDIQ contracts and drive work to them.</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>

<p>G.2.6 Please clarify that, in the following passage, the word “accreditations” refers ONLY to accreditations that provided contractor extra points in proposal evaluation. “NOTE: The Contractor shall maintain throughout the ordering period of HCaTS, at a minimum, the accreditations at time of contract award for all Contractor Key Personnel.”</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>L.5.4.9 "...degree in Instructional Systems Design (ISD)" and "Advanced Degree in Instructional Systems Design (ISD)". Will the government accept equivalent bachelors or advanced degree in the field of Education, similarly to the qualification in I.5.4.1.3 that states "a Degree in Human Capital or Human resources," since the ISD-specific program title has only been incorporated into accredited schools in the recent past?</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>L.5.4.14, what are the point value, total max points per element, and total max possible points for the Certified Professional Contracts manager (CPCM), Industry Certification in Contract Management- Defense (ICCM-D), or Industry Certification in Contract Management - Federal (ICCM-F) Level III?</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>The RFP key personnel requirements state there are points allocated for a CPLP degree or for an advanced ISD degree, but on the self-score worksheet, there are only points for the CPLP. Will the advanced ISD degree still be allotted points?</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>The RFP key personnel requirements also state points are allocated for a contracts management certification, but on the worksheet, there are no fields or points to represent this credential. Will this qualification be removed?</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>Did the Government intend to include points for the three items under L.5.4.14? If so, could those points be included prior to the release of the final RFP in order to help inform bid/nobid decisions?</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>L.5.4.14. does the CPCM certification identified refer to the National Contract Management Association (NCMA) CPCM certification?</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>H.6.9, M.7 Training services are broad ranging from analysis, design, development, evaluation, etc. Also, new tools and technologies are being used in learning all the time. By definition, these services are performed by individuals with broad range academic and professional credentials.</p> <p>The requirement of an ISD degree is too limiting. We suggest that GSA expand the qualifications in H.6.9and M.7 to include a broad range of degrees such as Adult Education, Leadership Development, Instructional Technology, etc.</p> <p>Also, we suggest adding experience in lieu of specific degrees and certifications.</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>

<p>H.6.10, M.7 There are very few training and human capital development contracts that require a Six Sigma black belt certification. Assigning point values to this certification will give an advantage to niche companies and large systems integrators rather than to companies that provide a broad range of true human capital and training capabilities. We suggest that GSA remove the points associated with the Six Sigma black belt certification and request that such a certification, if deemed necessary in the future, be requested at the task order level.</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>H.6.10, M.7 There are very few training and human capital development contracts that require coaching certifications. Assigning point values to this certification will give an advantage to niche companies rather than to companies that provide a broad range of true human capital and training capabilities. We suggest that GSA remove the points associated with coaching certifications and request that such certifications, if deemed necessary in the future, be requested at the task order level.</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>H.6.13, M.7 Degrees in Human Capital are relatively new and offered by few academic institutions. Experienced human capital professionals often have degrees or advanced degrees in I/O Psychology, Psychology, Human Development and other related fields.</p> <p>Human Capital services are broad ranging from strategy, workforce planning, and data analytics to transactional human resources services. By definition, these services are performed by individuals with broad range academic and professional credentials. We suggest that GSA expand the qualifications in H.6.13 and M.7 to include a broad range of degrees such as I/O Psychology, Psychology and other related fields, Human Development</p> <p><u>Suggest adding experience in lieu of specific degrees and certifications</u></p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>H.6.14, M.7 The NCMA certification process is lengthy and NCMA certification is not the only indicator of contracting expertise. We suggest that GSA add an “in lieu of” clause to H.6.14 and M.7 allowing for a law degree or 10 years of experience to be a substitute for the NCMA certification.</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>Attachment J.9, Contractor_Key_Personnel_Form_HCaTS_SB_draft. We recommend that you consider adding data entry fields to this form to allow Contractors to input information about any conventional BA/BS/MA/MS/PhD degrees the key principals have obtained, e.g., Bachelor’s Degree in Education. These general degree categories are still relevant and indicative of each key staff member’s expertise. It is expertise worth considering.</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>

<p>The draft self-scoring worksheets (Attachments J.5.1 and J.5.2) provide points for demonstrating staff with bachelor's or advanced degrees in Instructional System Design (ISD) and Human Resources (HR) or Human Capital (HC). Degrees relevant to ISD, HR, and HC may vary greatly. For example, a trained expert in ISD may have a degree in fields such as Education, Human Resources Development, or English Composition. Similarly, a trained expert in HR or HC may have a degree in fields such as Public Administration, Business Administration, or Psychology. Which degrees will the government accept as evidence of degrees in ISD, HR and HC?</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>Section M.7 (Page 143) does not identify points allocated to key personnel with CPCM, ICCM-D or ICCM-F certifications. Can GSA please identify the points allocated to these certifications?</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>Section G2.6 (Page 35) states "there is no minimum qualification requirements established for Contractor Key Personnel." Given this, as well as the fact that IDIQ and GWAC Program and Contract Management personnel are not typically human capital practitioners, will the government reconsider awarding points to Contractors who provide Key Personnel with human capital certifications including coaching certifications, instructional design certifications, and the like? These certifications are largely held by practitioners providing direct services to clients, rather than administrative personnel handling the management of contracts internally on behalf of Contractors.</p>	<p>The HCaTS Team has removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>Key Personnel The Coalition has similar comments concerning the additional credit allotted for contractor key personnel. The responsibilities outlined in G.2.6.1 and G.2.6.2 for the corporate HCaTS program manager and contract manager are reasonable and consistent with those of similar positions for other government-wide contracts. However the additional points given for certain certifications in Sections L and M are unique and will likely have negative unintended consequences if included at the master contract level. The concern is that personnel who have these certifications may not be the best contacts for managing HCaTS over the life of the contract. Experience managing government-wide contracts is much more relevant to contract performance and agency customer satisfaction. The additional points given for personnel with these certifications incentivize contractors to propose key personnel that maximize evaluation points versus proposing key personnel with significant experience with large multiple award IDIQs who are best suited to managing HCaTS. The additional qualifications for key personnel may be more appropriate for a specific task. Therefore, we recommend that credit for CPLP, ISD, Six Sigma Black Belt, PMP, Coaching, Human Capital and HR, CPCM and ICCM-D & ICCM-F for key personnel be removed at the contract level and allow agencies the flexibility to add these requirements at the task order level.</p>	<p>The HCaTS Team has removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>

<p>Section B.2.1 - Labor Categories and Standard Occupational Classifications / The table on Page 7 of the DRFP lists experience equivalents for various degrees. Can the government please clarify the experience and degree substitutions? We would suggest Master's Degree = Bachelor's Degree plus 4 years' experience; and a Doctorate = Masters+4 years or a Bachelors+8 years.</p>	<p>The HCaTS Team has removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>Section M.7 – Point Values for Relevant Experience Projects, Past Performance Ratings and Accreditations / How will experience of Contractor Key personnel be rated? The table in Section M.7 gives points for certifications, but no points for: years of experience, relevancy of experience, or government experience.</p>	<p>The HCaTS Team has removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations. A Contractor Key Personnel's experience need naught be disclosed and will not be evaluated.</p>	<p>Contractor Key Personnel</p>
<p>L.5.4.9 – Key Personnel: the scoring elements for key personnel include six (6) different qualifications/certifications. In section G.2.6, it states that the contractor shall assign a Corporate HCaTS Program Manager (CHPM) and Corporate HCaTS Contract Manager (CHCM). Must the two (2) proposed key personnel each hold all six (6) of the certifications to receive maximum points?</p>	<p>The HCaTS Team has removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>Comment: In section L.5.4.9 – Key Personnel, the scoring elements for key personnel include six (6) different qualifications/certifications. In section G.2.6, it states that the contractor shall assign a Corporate HCaTS Program Manager (CHPM) and Corporate HCaTS Contract Manager (CHCM).</p> <p>Recommendation: Some of the scoring elements for key personnel would not necessarily align with qualified candidates for CHPM and CHCM positions. We recommend defining additional key personnel roles such as Program or Project Manager roles for which certifications like a Certified Professional in Learning and Performance (CPLP) or Coaching Certification might be better applied.</p>	<p>The HCaTS team has removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>Page 132 of the RFP: L.5.4.13 HUMAN CAPITAL AND HUMAN RESOURCES CERTIFICATIONS AND DEGREES "Verification requirements include a copy of the Offeror's 1) Human Capital Strategist (HCS) Certification from the Human Capital Institute (HCI), 2) Professional in Human Resources (PHR) Certification, Senior Professional in Human Resources (SPHR) Certification, Global Professional in Human Resources (GPHR) Certification, or Human Resource Business Professional (HRBP) Certification from the HR Certification Institute (HRCI), 3) Human Resources and Training (HRT) Certification from American Management Association (AMA), 4) Human Resources Management Certification from the Graduate School USA, or 5) Bachelor's Degree or higher in Human Capital or Human Resources from an accredited university or college." / The SHRM Senior Certified Professional (SHRM-SCP) certification is recognized as the new gold standard of HR certifications. Will the government add that certification to the list of certifications held by key personnel eligible for points?</p>	<p>The HCaTS Team has removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>

<p>On page 36-37 of the DRFP, it lists the duties of the Corporate HCaTS Program Manager and Corporate HCaTS Contract Manager. On pages 128-129 and Attachment J.9, it lists several accreditations and certifications for which GSA/OPM will award extra points if our proposed personnel hold them. We feel that a qualified person performing the duties listed on page 36-37 would most likely not hold the majority of these accreditations and certifications. Would GSA/OPM consider lowering or eliminating the bonus points for holding these accreditations and certifications?</p>	<p>HCaTS Team has removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>In Section M.7's Point Value for Relevant Experience Table, there are currently no points listed associated with L.5.4.14, the Contractor Key Personnel Corporate Contracts Manager (CHCM). Will GSA/OPM please provide the points for this certification? If points are to be awarded, would GSA/OPM consider using National Contract Management certification of CFCM in addition to its certification of CPCM for purposes of additional point awards?</p>	<p>HCaTS Team has removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>Section G.2.6, pg. 35, Paragraph 1 calls for two (2) key personnel, the Corporate HCaTS Program Manager (CHPM) and Corporate HCaTS Contract Manager (CHCM): Are the two key personnel referenced in section G.2.6, pg. 35, the only key personnel? If we are submitting candidates to satisfy personnel with the required PMP, Six Sigma, HCI, etc., are those individuals also considered key personnel?</p>	<p>The CHPM and CHCM are the only two Contractor Key Personnel that are to be proposed by an Offeror. Furthermore, HCaTS Team has removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>Per the note on page 35, does the PMP certification and Six Sigma Black Belt certification have to be held by the CHPM or CHCM in order for the company to receive points for their certificatio</p>	<p>HCaTS Team has removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>Section G.2.6 pg. 35 Key Personnel and Sections L.5.4.9-L.5.4.14, pages 128-130; The RFP currently provides conflicting Key Personnel requirements and if our interpretation is correct, requires a large number of Key Personnel (approximately 22 including the CHPM and CHCM) to be submitted without duplication across areas identified in the proposal (PMP, Six Sigma, HCI, ISD, CPLC, etc.) in order to receive points for those certifications. Additional clarification is required since the Key Personnel information on page 35 (including the note about holding more than one certification) conflicts with the information in sections L.5.4.9 - L.5.4.14 on pages 128-130 which indicates that the Offeror shall only receive credit for a maximum of one certification or degree per Contractor Key Personnel. Will the government please clarify the Key Personnel requirements?</p>	<p>Offerors shall only propose two Contractor Key Personnel per proposal. If submitting under both Pools, the Offeror may propose the same Contractor Key Personnel (for a total of 2) or different Contractor Key Personnel (for a total of 4). Furthermore, HCaTS Team has removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>Why is the government only giving credit for one certification per Contractor Key Personnel?</p>	<p>HCaTS Team has removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>How does it diminish the value of any single certification if multiple certifications are held by one person?</p>	<p>HCaTS Team has removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>

<p>Given that this is an IDIQ contract vehicle and not an actual task order, how does the government justify the need for a company to have 20 different individuals identified as key personnel in order for a company to score the maximum points for sections L.5.4.9, L.5.4.10, L.5.4.11, L.5.4.11, L.5.4.12, L.5.4.13, and L.5.4.14?</p>	<p>Offerors shall only propose two Contractor Key Personnel per proposal. If submitting under both Pools, the Offeror may propose the same Contractor Key Personnel (for a total of 2) or different Contractor Key Personnel (for a total of 4). If submitting under both Pools, the Offeror may propose the same Contractor Key Personnel (for a total of 2) or different Contractor Key Personnel (for a total of 4).</p> <p>Furthermore, HCaTS Team has removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>Would the government consider requiring offerors to demonstrate current certifications on an annual basis vs. requiring that each certification be held by one specific key personnel?</p>	<p>HCaTS Team has removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>Section H.6.9, pg. 54, paragraph 1: "Contractor Key Personnel are encouraged to have a (CPLP) Certification or a Degree in Instructional Systems Design (ISD) during the entire ordering period of their HCaTS contract." Are ISD degrees and CPLP Certifications interchangeable in terms of maintaining the offeror's certifications for the life of the contract? In other words, if a person with a CPLP certification leaves and a person with an ISD degree is hired, will this meet the requirements of the contract? Do the key personnel with these certifications need to be the key personnel defined on page 35 – the CHPM and CHCM?</p>	<p>HCaTS Team has removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>Section H.6.13, pg. 55, paragraph 1: "Contractor Key Personnel are encouraged to have one of the following Human Capital or Human Resources Certifications or a Degree in Human Capital or Human Resources that focus on human resources strategies and consulting services for HR organizations..." Q20. Is this requirement and the points associated with it only applicable to the key personnel defined on page 35 – the CHPM and CHCM?</p>	<p>HCaTS Team has removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>Section H.6.13, pg. 55, item #5. "A Bachelor's Degree or higher in Human Capital or Human Resources from an accredited university or college." There is a broad range of degree programs relevant to this field including M.S. Industrial and Organizational Psychology, B.S. Organizational Management, B.S. Organizational Counseling, M.S. Organizational Development, B.S. Applied Behavioral Science, B.S. Labor and Employment Relations, B.S. Educational Psychology, B.S. Education, B.S. Education, and an MBA with a focus area. Please provide additional clarification on the government's definition of a Human Capital or Human Resources Bachelor's Degree?</p>	<p>HCaTS Team has removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>For example, do Human Capital degrees include a Masters in I/O Psych? Organizational Development? Social Psychology? MBA?</p>	<p>HCaTS Team has removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>Are alternative degrees acceptable?</p>	<p>HCaTS Team has removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>

Will you accept equivalents, or establish criteria for equivalents (such as years of experience)?	HCaTS Team has removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.	Contractor Key Personnel
For example, would OPM consider awarding extra points for a Masters or PhD in I/O Psych?	HCaTS Team has removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.	Contractor Key Personnel
Contractor Key Personnel Form, Section I, a. (Company Name) only allows companies to enter 39 characters of text, and Section IV, c. (Company) only allows companies to enter 36 characters of text. These text fields are too small for us to provide our full company name. Can the government expand these blocks to at least 45 characters? J.9 Contractor Key Personnel Form, Section II, c. (Position) only allows companies to enter 20 characters of text. This text field is not large enough to provide the complete title for several positions. For instance, the title "Corporate HCaTS Program Manager" is 31 characters, so most of this title would not fit. Can the government expand this block to accommodate longer position titles?	HCaTS team has removed the Contractor Key Personnel scoring element and Contractor Key Personnel Form due to Industry Feedback. The final RFP will only have company-wide accreditations.	Contractor Key Personnel
Can Contractor Key Personnel be the same for each pool (for a total of 2) or are different contacts required per pool (for a total of 4 key personnel)?	If submitting under both Pools, the Offeror may propose the same Contractor Key Personnel (for a total of 2).	Contractor Key Personnel
HCaTS type work is intellectually driven. Is B.3.1 where GSA anticipates labor categories that reflect the level of expertise needed to perform high-level human capital programs, e.g. PhDs in industrial/organizational psychology and M.A./M.Eds in instructional design?	We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.	Contractor Key Personnel
Reference Contractor Key Personnel Form, Section III. PROPOSAL SUMMARY-KEY PERSONNEL ACCREDITATIONS, Question "e" - How many valid "Human Capital and Human Resources" Certifications and Degrees do the key personnel hold combined?	The HCaTS team has removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.	Contractor Key Personnel
The answer options, "3 and 4 or more" don't appear to support the scoring identified the self-scoring sheet. The scoring sheet implies that an offeror should only take credit for either a "certification or degree" worth 50 points. If you have an advanced degree then it would be 75 points. Our understanding of the RFP instructions is that an offeror shall only take credit for one degree or certification per category. Ref page 129 RFP, "The Offeror shall only receive credit for a maximum of one certification or degree per Contractor Key Personnel." If this is still true, then the answer to question 3. Should not have an option for "4 or more"	The HCaTS team has removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.	Contractor Key Personnel
If the key personnel can qualify for both a certification/bachelors and an advanced degree, then L.5.4.13 should add up to 250 and the language in the RFP should be clearer.	The HCaTS team has removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.	Contractor Key Personnel
We recommend that given the scope of the HCaTS solicitation, the HR degrees should be evaluated separately from the certifications and not be evaluated together. Ref page 142 and 143 Draft RFP and the scoring sheet also. In addition, a Bachelors degree should receive more merit than a certification and not equal to a certification as currently demonstrated.	The HCaTS team has removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.	Contractor Key Personnel

<p>Beyond EVMS, GSA and OPM should re-evaluate the need for each of the other systems, certifications, and clearances listed in the Draft RFP and include in the evaluation criteria only those that are absolutely necessary for a majority of the work expected to be performed under the contract. For those systems, certifications, and clearances that may not be needed for a majority of task orders, OPM and GSA should state in the RFP that it is strongly encouraged that contract awardees demonstrate proactive steps to move towards specific certifications and systems and that failure to do so may impact future task orders and off-ramp decisions.</p>	<p>All Contractor Key Personnel accreditations will be removed from the RFP, along with the CMMI and ISO 14001 certifications.</p>	<p>Contractor Key Personnel</p>
<p>3. Page 35 of 144 . . . G.2.6 Contractor Key Personnel reads . . . “The Contractor shall maintain throughout the ordering period of HCaTS, at a minimum, the accreditations at time of contract award for all Contractor Key Personnel. For example, if a Contractor’s proposal included a Project Management Professional (PMP) Certification and Six Sigma Black Belt Certification and made a part of contract award, then the Contractor Key Personnel shall maintain a Project Management Professional (PMP) Certification and Six Sigma Black Belt Certification for the duration of the HCaTS ordering period.”</p> <p>Comments/Suggestions: Not all qualified personnel are going to have the same accreditations. For example, is someone who has a PMP and is a certified coach less qualified than someone who has a PMP and a Six Sigma Black Belt? No, they just have different certifications. Requiring contractors to replace key personnel with someone with the exact same certifications would be onerous to say the least. We recommend the statement be reworded accordingly . . . “The Contractor shall maintain throughout the ordering period of HCaTS, at a minimum, the same quality of key personnel as they are replacing. Quality would be evidenced by certifications, experience, and education.”</p>	<p>The HCaTS team has removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>10. H.6.9, M.7 Key Personnel Qualifications</p> <p>The KSAs listed are very broad, but the qualifications of the key personnel are very limited.</p> <p>Training services range from analysis, design, delivery to technology and are performed by a wide range individuals with different academic and professional credentials based on the type of work. For example, an ICF certified coach is required specifically for performing coaching services, and PMP is required for project management.</p> <p>The requirement of an ISD degree is too limiting.</p> <p>Comments/Suggestions: Expand the qualifications to include years of experience and deleting the requirements for certifications since different certifications are required to perform different services.</p>	<p>HCaTS team has removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>

<p>11. H.6.13, M.7 The KSAs listed are very broad, but the qualifications of the key personnel are very limited. Degrees in Human Capital are offered by few academic institutions. Some academic institutions are awarding Certificates in Human Capital Management.</p> <p>Experienced human capital professionals often have advanced degrees in I/O Psychology, Psychology, Human Development, HR and other related fields. Human Capital services are broad ranging from strategy to transactional human resources services. These services are typically performed by individuals with broad range of academic and professional credentials. For specialized services, people with the right credentials are selected, such as classifications work.</p> <p>Comments/Suggestions: Recommend expanding the qualifications to include years of experience and deleting the requirements for certifications since different certifications are required to perform different services.</p>	<p>HCaTS team has removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>H.6.10, M.7 & H.6.12, M.7 There are very few training and human capital development contracts that require coaching and Six Sigma black belt certifications. Assigning point values to this certification will give an advantage to niche companies and large systems integrators rather than to companies that provide a broad range of human capital and training capabilities.</p> <p>Comments/Suggestions: Remove the points associated with the Six Sigma black belt certification and request that such a certification, if deemed necessary in the future, be requested at the task order level.</p>	<p>HCaTS team has removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>H.6.14, M.7 The NCMA certification process is lengthy and NCMA certification is not the only indicator of contracting expertise. Even government COs don't have this certification.</p> <p>Comments/Suggestions: GSA should add an "in lieu of" clause to H.6.14 and M.7 allowing for a law degree or 10 years of contract management experience to be a substitute for the NCMA certification.</p>	<p>HCaTS team has removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Contractor Key Personnel</p>
<p>Page 141, Section M.7. It is unclear whether the government intends to award points for projects being inclusive of Cost-Reimbursement for two total projects or two projects per pool.</p>	<p>An Offeror is able to receive points for two Cost-Reimbursement projects per Pool.</p>	<p>Cost Reimbursable</p>
<p>Will the Government consider awarding points under this section for cost reimbursable Travel/ODC's under Time and Material and Fixed Price contracts?</p>	<p>This recommendation was considered but the RFP will not be amended to reflect it.</p>	<p>Cost Reimbursable</p>
<p>While a project awarded primarily as a firm fixed price contract, with a cost reimbursement line item be awarded points for cost reimbursement contracting? For example, a fixed price contract for custom training solutions with travel or materials reimbursed at cost.</p>	<p>Any amount of cost-reimbursable type contract will be considered as a cost-reimbursable type Relevant Experience Project and will receive points for this scoring element. However, Offerors cannot take credit for this scoring element if the cost-reimbursable element is for travel or other costs associated with travel.</p>	<p>Cost Reimbursable</p>
<p>L.5.2.3.7: Relevant Experience with Cost Reimbursement Contracts. Can GSA please clarify whether the task order must be 100% cost reimbursement or if an offeror can qualify if a contract has one or more CLINs that are reimbursable (for example reimbursable CLINs for travel and/or ODC's)?</p>	<p>Any amount of cost-reimbursable type contract will be considered as a cost-reimbursable type Relevant Experience Project and will receive points for this scoring element. However, Offerors cannot take credit for this scoring element if the cost-reimbursable element is for travel or other costs associated with travel.</p>	<p>Cost Reimbursable</p>

<p>The DRFP awards extra points for cost reimbursement projects, according to Section L.5.2.3.7, but not for time and materials or labor-hour contracts. According to B.1.6 Contract Type, HCaTS will allow for all contract types (fixed-price, cost-reimbursement, time-and-materials, and labor-hour), so we would argue that extra points should not be awarded solely for past performance that reflects cost reimbursement contracts.</p>	<p>This recommendation was considered but the RFP will not be amended.</p>	<p>Cost Reimbursable</p>
<p>What percentage of the HCaTS task orders (TOs) does OPM/GSA estimate will be issued as cost type contracts? Section B.2.3 indicates that cost reimbursement TOs shall only be used for the acquisition of non-commercial items. We assume the bulk of TOs anticipated will be for commercial services. If so, why are the other types not allocated points in the M.7 scoring schema? Shouldn't the evaluation of experience with these contract types be reflective of the historical trend of tasks that are expected to be let under HCaTS? Likewise, shouldn't the historical trend of contract size be taken into account when limiting the Pool Past Performance and Relevant Experience Projects to six large contracts performed as a prime?</p>	<p>We do not have an estimate of how many task orders will be issued as non-commercial. However, because we are providing Ordering Contracting Officers with the opportunity to award non-commercial task orders, we believe that Offerors with prior experience in administering cost reimbursable is a value add.</p>	<p>Cost Reimbursable</p>

<p>References from M.7: L.5.3.2.5; L.5.4.1; L.5.4.2; L.5.4.3</p> <p>L/M omission: Examining the historical spend by the Federal Government under the GSA HR and Equal Employment Opportunity Services, 738X schedule contract for SINS 595-21, HR General Support Services, of the 160 schedule holders in FY 2014, only 89 vendors had any reportable 738x schedule sales (total approaching \$120M). Only 20 of the 89 had FY 2014 sales exceeding \$1M, only 5 vendors had sales exceeding \$4M, and the top three vendors (in sales) accounted for 49% of all HR General Support Services. The data indicates most sales were below the HCaTS thresholds for project value (L.5.2.3.4), period of performance (L.5.2.3.5), subcontracting/teaming (L.5.2.3.6), were firm fixed price (FFP) (i.e., not ostreimbursement, L.5.2.3.7), and were commercial. As one of the largest providers of services under GSA 738X Schedule that has provided HR/HCM services for more than 80 Federal agencies, we have encountered only a handful of cost type contracts. Our understanding is that the vast majority of tasks issued under TMA and the Army's HR Solutions were either FFP or time and materials (T&M) contracts. This history would lead one to believe that the majority of tasks from both defense and civilian agencies would be FFP or T&M, and that the vast majority would be small- to mid-size projects; however, the scoring process only allows for full points for large cost type contracts.</p> <p>Suggestion. While the data indicates the majority of the HCaTS-type services currently acquired by the Federal Government are being delivered by qualified firms with the capacity for successfully managing a high volume of smaller value contracts; this important ability is not an evaluation factor in the current draft RFP. To address this, we suggest minimizing the points associated with cost type contracts for past performances and adding points commensurate with the historical number or dollar value for FFP and T&M tasks issued in order to better reflect the anticipated ratio of TO contract types. Also, we suggest eliminating or lowering the points allocated for DCMA verified purchasing and estimating systems and instead allow them to be a disqualifier at the TO level for any cost type TOs issued. We suggest that a better way to evaluate a contractor's ability to manage cost type TOs is by using the standard found in B.2.3., which simply requires the demonstrated capability to comply with all process and reporting requirements for cost contracting.</p>	<p>We will revisit the allocation of points for each scoring element.</p>	<p>Cost Reimbursable</p>
<p>section L.5.1.8 – In regard to the Contractor Team Arrangement (CTA), if there are multiple partners with multiple entities, do the combined relevant experiences (across multiple entities together) count towards the total amount of relevant experience projects acceptable and points awarded as laid out in Section L.5.2.3.6?</p>	<p>When submitting a proposal as a Joint Venture, all Relevant Experience Projects and associated past performance information shall have been awarded under the existing Joint Venture's DUNS Number and not the individual members making up the Joint Venture.</p>	<p>CTA</p>
<p>Will all Joint Venture and CTA team members all need to be within the size standard and respective HCaTS Pool that they are applying for access to?</p>	<p>The methodology to calculate your business size can be found in FAR Section 19.101.</p>	<p>CTA</p>

<p>Will the Government consider providing less than full credit for Joint Ventures and CTAs that claim joint credit for ISO certification and CMMI rating, than Offerors with a single prime that provide those certifications and ratings?</p>	<p>In order for a Joint Venture to take credit for any accreditation, the accreditation shall be in the Joint Venture's name.</p> <p>The DRFP states "The Joint Venture or Partnership, and not the individual team members, shall represent all proposal submission documents required under Section L.5.1.8, including all Relevant Experience Projects, Past Performance, and accreditations, as applicable, under this solicitation."</p>	<p>CTA</p>
<p>Will GSA be posting the attachments (Part III: Section J) from page 79 of 144 of the solicitation as part of the DRAFT solicitation? If not, does GSA intend to post these attachments ahead of the release of the final RFP?</p>	<p>All attachments, except for J.2, were uploaded in the Presolicitation Notice. All attachments will be included in the Final RFP.</p>	<p>Draft RFP</p>
<p>The Coalition for Government Procurement appreciates GSA and OPM for the opportunity to comment on the HCaTS Draft RFP and for the ongoing dialogue with all stakeholders on this important procurement. In the spirit of this Mythbuster's dialogue, the Coalition respectfully requests that the comment deadline for the HCaTS Draft RFP be extended to April 30, 2015. We believe that the additional time will result in more effective and thoughtful comments to GSA and OPM on the structure of the HCaTS RFP. Given the strategic importance of this contract in support of personnel development, human capital services and organizational improvement government-wide, an extended comment period would be in the best interest of customer agencies as well as the American taxpayer. The additional time is also necessary given the substantial update provided in the draft RFP. Thank you for your consideration and we look forward to continuing the Myth-buster's dialogue with you on this procurement.</p>	<p>The HCaTS PMO has extended the deadline for significant comments from March 30, 2015 to April 15, 2015. Feedback is still welcome after this deadline up until the RFP is posted. Significant feedback that may lead to drastic changes of the RFP require more time on the part of the Government.</p>	<p>Draft RFP</p>
<p>In order to properly review the DRAFT RFP and provide more targeted comments/questions we respectfully request an extension to submit feedback until April 13.</p>	<p>The HCaTS PMO has extended the deadline for significant comments from March 30, 2015 to April 15, 2015. Feedback is still welcome after this deadline up until the RFP is posted. Significant feedback that may lead to drastic changes of the RFP require more time on the part of the Government.</p>	<p>Draft RFP</p>
<p>On behalf of PDRI, I am writing to request that the deadline for industry comment to the above referenced HCaTS Draft RFP be extended one month, to April 30, 2015. Additional time will be necessary after the attachments listed in Section J are released. These attachments form much of the basis for scoring industry proposals and so will warrant close scrutiny by potential offerors. Additionally, the draft RFP includes significant changes with important implications for the government and for offerors; allowing additional time for industry response will increase the likelihood of GSA and OPM receiving the most valuable and useful feedback to incorporate into this critical procurement.</p>	<p>The HCaTS PMO has extended the deadline for significant comments from March 30, 2015 to April 15, 2015. Feedback is still welcome after this deadline up until the RFP is posted. Significant feedback that may lead to drastic changes of the RFP require more time on the part of the Government.</p>	<p>Draft RFP</p>
<p>How close will this attachment be that is now unrestricted, to the final RFP which will be issued on or about May 19, 2015.</p>	<p>Several elements in multiple sections of the Draft RFP may change based on the feedback we receive. It will be the Offeror's responsibility to read the Final RFP in its entirety and abide in sum to the terms and conditions.</p>	<p>Draft RFP</p>
<p>What is the reason for the Archive date April 30, 2015 if this is only a draft and a pre-solicitation notice?</p>	<p>The Draft RFP archive date has been changed to May 15, 2015.</p>	<p>Draft RFP</p>

Section L.5.1.9, paragraph one, states, "To be eligible for award, the Offeror shall follow the directions and submit the following information under Volume II." Should this be Volume I? The instructions contained in the table in Section L.4.1 on page 97 appear to provide contradictory guidance.	It should state Volume I in L.5.1.9. This will be corrected in the final RFP.	Draft RFP
Section L.5.1.9.1, paragraph four, describe Sections I - III and V - VIII of the GSA Form 527, but there is no description of Section IV. Can OPM provide details regarding Section IV?	Section IV is explained in Section L.5.1.9.1, it is in the same section as the explanation for Section III.	Draft RFP
M.7, assigns the following points based on the value of a Relevant Experience Project: Project's value is equal to or greater than \$150,000 but less than \$250,000 on an annual basis – 100 points <input type="checkbox"/> Project's value is equal to or greater than \$250,000 but less than \$500,000 on an annual basis – 200 points Project's value is equal to or greater than \$500,000 but less than \$750,000 on an annual basis – 300 points Project's value is equal to or greater than \$750,000 on an annual basis – 400 points These point values differ from those listed in Attachment J.5.2 for Relevant Experience Projects. Could the government please clarify the points Offerors can expect to receive based on the value of a Relevant experience Project?	The RFP will be amended to correct the discrepancy. We will revisit the allocation of points for each scoring element.	Draft RFP
M7, assigns the following point values to the period of performance of projects included in Relevant Experience Projects: The period of performance is equal to or greater than 6 months but less than 37 months. – 100 points The period of performance is equal to or greater than 37 but less than 61 months – 200 points The period of performance is equal to or greater than 61 months – 300 points Attachment J.5.2 assigns 100 points to a Relevant Experience Project if the period of performance is equal to or greater than 13 months but less than 37 months. This period of performance differs from the period of performance that qualifies for 100 points listed in Section M.7. Could the government please clarify the variations of the stated points?	The RFP will be amended to correct the discrepancy. We will revisit the allocation of points for each scoring element.	Draft RFP
L.5.1.5 "The Offeror shall answer Questions 2 through 2.C, regardless if the Offeror is not subject to CAS." The wording of this sentence is confusing. Can this sentence be read as: "The Offeror shall answer Questions 2 through 2.C, regardless of whether or not the Offeror is subject to CAS?"	The Final RFP will be amended to clarify this sentence	Draft RFP
L.1 - FAR 52.252-1: The Draft RFP currently references FAR 52.237-10, OCT 1997 version. Please confirm that the final RFP will reference FAR 52.237-10 – Identification of Uncompensated Overtime – March 2015 version.	Yes, the RFP will include all of the current FAR Clauses as of the day it is posted.	Draft RFP
Is it possible to make publicly available the MOU that spells out the terms under which OPM and GSA will cooperate, so that contractors can understand how the relationship between OPM, GSA, and the OCOs will work?	The MOU was provided in the Draft RFP in Section B.	Draft RFP
If the MOU is not available, please answer the following questions: a. With whom will contractors sign a contract? b. Will ordering agencies' agreements be with GSA or OPM? c. Will ordering agencies' funds be transferred to the OPM revolving fund, some instrumentality at GSA, or some other fund, and under what authority?	Read the MOU that is linked in the Draft RFP.	Draft RFP
Section B.3.3 of the Draft Request for Proposal (page 10) discusses OCONUS work. If a task order involves OCONUS work, would the contractor support U.S. Government civilians on United States soil in a foreign area, such as a military base overseas, or would it be on foreign area/land?	Although technically a possibility, historically the preponderance of work has been performed in Washington, D.C.	Draft RFP

<p>Section L.5.2 (Page 114) states, "A Relevant Experience Project is defined as a single contract; or, a single task order placed under a master Single Award or Multiple Award, Indefinite Delivery, Indefinite Quantity (SA/MA IDIQ) task order contract (FAR Subsection 16.501-1); or, a single task order placed under a Federal Supply Schedule (FAR Subsection 8.405-2); or, a single task order placed under a master Single Award or Multiple Award Blanket Purchase Agreement (SA/MA BPA) (FAR Subsection 8.405-3 or FAR Section 13.303)." Can GSA please define "single contract" in the context of this paragraph? That is, is a single contract intended to mean a stand-alone contract not connected to any IDIQ, FSS or BPA? If so, then this seems to conflict with the sentence in paragraph four which states, "If a single contract has a task order(s) awarded against it, the Offeror shall submit either the single contract or the task order(s) as the Relevant Experience Project, but not both."</p>	<p>Yes, the RFP will be amended adding the definition of a contract.</p>	<p>Draft RFP</p>
<p>The point totals for Pools 1 and 2 in Section M.7 (Page 143) do not appear to match the sums of the individual scoring elements. Can GSA please clarify the individual and total point allocations?</p>	<p>The RFP will be amended to correct any discrepancies.</p>	<p>Draft RFP</p>
<p>In the paragraph following the 6 KSA objectives - "These three KSAs will enable HCaTS SB to provide Federal agencies..." - does the government mean "these six KSA's" etc."</p>	<p>The RFP will be amended to correct this discrepancy. It should state three.</p>	<p>Draft RFP</p>
<p>(Section M.6.3), p. 140 What is the "survey" that you're referring to?</p>	<p>The survey refers to the Past Performance Substitute Form. The RFP will be amended to correct this.</p>	<p>Draft RFP</p>
<p>Volume 2 (L.5.2) , p.100 Please verify the correct file name. It should be volume 2, correct? "ABC.VOL1.J4.pdf "</p>	<p>The RFP will be amended to reflect this.</p>	<p>Draft RFP</p>
<p>On page 117, there is a statement about the verifiable contractual documents to substantiate the relevant experience project. What qualifies as "verifiable contractual" documents? Can GSA/OPM provide examples?</p>	<p>The RFP will be amended to add examples</p>	<p>Draft RFP</p>

<p>The solicitation takes a hard line against the enabling infrastructure for our economy and workforce – IT solutions.</p> <ul style="list-style-type: none"> • HR technology development and implementation is the fastest growing area in HR, and Kennedy Information (a research group) indicates that HR Consulting is one of the fastest growing areas in consulting, it stands to reason that TMA should be in the technology business within the HR/HC, and OE world – assessment, requirements, design, development, implementation, evaluation, but not pure O&M. • HR systems are never static. They are constantly changing as the needs of the workforce evolve, OPM mandates change, Congress enacts new legislations, etc... Agencies need a partner that understands human capital strategy AND IT; the lifecycle of a federal employee; workforce planning; IT design, development, and implementation; organizational effectiveness; and business process optimization. That is the only way they can effectively streamline, optimize, and improve the many systems and tools that support the civilian workforce and mission accomplishment. <p>Possible mitigation strategies:</p> <ul style="list-style-type: none"> • Remove the requirement that non-IT support (software development) can account for no more that 50% of a TO. • Remove language specifying that all non-IT support should be “incidental”. 	<p>The 50% threshold will be removed from the RFP.</p>	<p>Draft RFP</p>
<p>Section C.3.2, pg 19, paragraph 3. “The OCO shall ensure that the aggregate dollar amount of all ancillary support services and supplies, including IT and non-IT products and services, is less than 50% of the task order’s awarded amount or estimated cost. OCOs may establish further restrictions to this threshold; however, are prohibited from exceeding it at any time.”</p> <p>HR technology development and implementation is the fastest growing area in HR, and Kennedy Information (a research group) indicates that HR Consulting is one of the fastest growing areas in consulting, it stands to reason that HCaTS should be in the technology business within the HR/HC, and OE world – assessment, requirements, design, development, implementation, evaluation, but not pure O&M.</p> <p>Will the government consider removing the requirement that non-IT support (software development) can account for no more that 50% of a TO.</p>	<p>The RFP will be amended removing this threshold.</p>	<p>Draft RFP</p>
<p>Will the government consider removing the language specifying that all non-IT support should be “incidental”?</p>	<p>This recommendation was considered but the RFP will not be amended.</p>	<p>Draft RFP</p>
<p>We recommend that the government remove the requirement on Page 114, Section L.5.2 of the draft RFP to limit the number of sole source Relevant Experience Projects.</p>	<p>This restriction has been removed from the RFP.</p>	<p>Draft RFP</p>

<p>Non-Federal organizations apply a variety of procurement practices that don't lend themselves to the binary categorization of either sole-source procurements or formal competitive procurements. Non-federal organizations often employ competitive processes that do not utilize a formal, transparent RFP process and the binary evaluation may be misinterpreted by non-Federal survey respondent thus inappropriately disqualifying a relevant experience project. The HCaTS field is extremely competitive across industry sectors. How does this requirement serve as a unique discriminator among offerors? What value does this provide to the government?</p>	<p>This restriction has been removed from the RFP.</p>	<p>Draft RFP</p>
<p>How will the government take this into consideration so that the submission of Relevant Experience Projects procured through non-federal means are not unfairly penalized due to a categorization requirement that is not consistently applied across industries?</p>	<p>The HCaTS team is making the assumption this question refers to the sole source restriction; this restriction has been removed from the RFP.</p>	<p>Draft RFP</p>
<p>Section M.3, paragraph one, states, "The HCaTS evaluation team will perform a two-step screening process for all proposals received. First, the HCaTS evaluation team will verify that a support document exists for all the evaluation elements in accordance with the Offeror's proposal checklist submitted in accordance with Section J.2 (Proposal Checklist) and compare it to the Offeror's self scoring worksheet submitted in accordance with Section J.5.1 (Self Scoring Worksheet Pool 1) and/or J.5.2 (Self Scoring Worksheet Pool 2). Any discrepancies will be treated as clarifications." Can OPM clarify what "clarifications" means in the last sentence?</p>	<p>In accordance with FAR 15.306(a), "(1) Clarifications are limited exchanges, between the Government and offerors, that may occur when award without discussions is contemplated. (2) If award will be made without conducting discussions, offerors may be given the opportunity to clarify certain aspects of proposals (e.g., the relevance of an offeror's past performance information and adverse past performance information to which the offeror has not previously had an opportunity to respond) or to resolve minor or clerical errors."</p>	<p>Evaluation</p>
<p>Rather than recommending a minimum dollar figure or a specific number of task orders, we would suggest that the criteria associated with remaining among the pool of selected HCaTS contractors—to the extent that there is a need for such criteria—focus more on indicators of quality (i.e., client satisfaction) rather than the proposed quantity-focused metrics. In order to enforce the proposed criteria, the HCaTS vehicle must be marketed well, and government clients must see value in using the vehicle. Frankly, we have had several clients who we have worked with in the past through the OPM TMA vehicle decide to stop using the vehicle. For that reason, we are concerned that vendors may have limited control over how many contracts they are awarded and what the total dollar value of those contracts are. Such criteria could also be biased in favor of larger organizations, culling smaller companies from the HCaTS pool who are doing excellent work but don't see the volume of work that the larger vendors do.</p>	<p>This recommendation was considered but the RFP will not be amended.</p>	<p>Evaluation</p>
<p>In the event that the government has not provided a rating for a certain rating area in CPARS, how are those areas evaluated?</p>	<p>The RFP states: NOTE: If an Evaluation Area was not rated, do not assign a score for that Evaluation Criteria. Total the scores and divide that by the number of rated Evaluation Areas, rounding to the hundredth decimal position. If the thousandth decimal position is equal to or less than 4, round the hundredth decimal position down. If the thousandth decimal position is equal to or greater than 5, round the hundredth decimal position up.</p>	<p>Evaluation</p>

L.5.1.9.1 Financial Resources, Section III, Item 3: Offerors are required to submit the last full fiscal year statement and subsequent interim statements. If an offeror is a publicly held company, is it acceptable to provide the web address of the SEC filings containing this information. Page limitations prohibit publicly held companies from meeting this requirement.	The RFP will be amended allowing Offerors to submit financial statements without page limitation. Web addresses will not be accepted.	Financials
L.5.1.9.1 para3: We recommend that the requirement stipulating that Offerors should submit GSA Form 527 ("Contractor's Qualification and Financial Information") be removed. Offerors that have a private limited liability partnership structure cannot distribute financial statements to parties other than their partners, principals, and lenders. Large size and a strong record of success of Offerors should provide compelling evidence of the possession of the financial resources needed to serve the government. To offer an example, EY is a substantial entity, with more than 31,000 people working in the US. The partnership's fiscal year 2014 total revenues exceeded \$9.9 billion, with growth of 9% or more over the last three years. The requirement of the submission of GSA Form 527 will prevent such organizations that possess strong relevant capabilities from responding to the HCaTS solicitation.	This recommendation was considered but the RFP will not be amended.	Financials
Will the Government include the three years of "good financial standing" that was a part of the RFI released for comment in December/January?	All determinations of financial responsibility shall be arrived at by the information provided by the Offerors. If additional information is required, the Government may request it.	Financials
Section L.5, Proposal Content, top of page 102; Section L.5.1.7, page 108, list of forms. Question: We have found that some of our task order awards use Optional Forms 347 (and continuation page Optional Form 348). Would the Government please add this form to the list of examples presented in the referenced proposal sections?	Yes, they will be added to the list of examples presented in the proposal.	Forms
Because of the numerous of moving parts- if possible when in the final drafts submitted, can a checklist can be generated to ensure all information is received.	All attachments, except for J.2, were uploaded in the Presolicitation Notice. All attachments will be included in the Final RFP.	Forms
What is the average project value and length of performance under the previous TMA contract?	Per OPM, "Under the previous TMA contract, reimbursable service delivery was organized into discrete projects in the Office of Personnel Management's (OPM) financial information system and based on available information the average project value was approximately \$2 Million and the average length of performance was approximately 16 months."	General
Page 118, the section that includes the NOTE does not seem to apply to the surrounding text. Please clarify.	Yes, this note applies to the surrounding text. The Self Scoring Worksheet (Attachments J.5.1 and J.5.2) instruct the Offeror to state where in the contractual documents that various elements are located. The Offeror will use the contract or task order documents to substantiate cost-reimbursement type contracts, teaming with or subcontracting out to 4 or more entities, and demonstrating that the Relevant Experience Project was within scope of the KSA(s).	General
How many days does the government anticipate offerors will have to prepare a response to the final RFP?	The Government will provide no less than 30 days, and is still considering the initial response time. In the event that additional time is needed the RFPs can be amended to allow it.	General

Please confirm that small businesses that are awarded an HCaTS SB contract cannot bid on TOs issued under the unrestricted HCaTS contract.	Ordering Contracting Officers shall identify a predominant NAICS Code at the task order level from one of the two Pools under either contract vehicle (HCaTS or HCaTS SB). Only those Contractors awarded a contract under that specific Pool under the chosen contract vehicle may submit an offer against a task order solicitation.	General
This section requires that the offeror provide a copy of its Compensation Plan, however, it limits the size to 10 pages. Compensation Plans are corporate documents that are not generally tailored to an RFP. Would the Government consider deleting the page limitation for the Compensation Plan?	We will remove the page limitations for this and the Uncompensated Overtime Plan document	General
The solicitation states that the Offeror will be excluded from further consideration for award if the total error rate on the Self Scoring Worksheet is greater than 10%. Before this exclusion is enacted, will the Offeror be notified of the errors and be provided with an opportunity to justify why the Offeror's original Self Scored score should prevail?	This restriction has been removed.	General
Procuring practices differ across industry sector. Many non-Federal procurement organizations source using pre-qualified vendor practices to streamline competition. During this process, vendors are vetted and evaluated against pre-established criteria in order to receive an award. This pre-qualified procurement practice is distinguished as a separate procurement practice from sole source procurements. As such, please confirm that the government will consider awards using pre-qualified vendor selection as a competitive award when selecting a response in Section II, Question j.	This restriction has been removed.	General
Does the government require a Washington DC based office in order to bid this contract?	No.	General
L.4 If significant source material is required in a volume, a volume might grow beyond the limits of a 25 MB zip files. Recommend permitting a volume to be split across zip files if necessary to meet the requirements of the RFP.	This requirement has been revised and the only accepted method of proposal submission will be via DVD+R. The final RFP will reflect this change.	General
H.19 (H.25) Without knowing the level of commitment to use HCaTS and HCaTS SB that GSA and OPM may have received from Federal Government agencies, it is impossible to ascertain the validity of the metric established in the DRFP. Knowing the challenge currently faced by OPM in generating more than \$5 million annually in collective OPM-TMA task order value begs the question as to the HCaTS SB projected annual value upon which this metric is based. Recommends GSA and OPM identify the projected annual HCaTS SB value basis for this metric, and include provisions for a metric adjustment should the projected annual HCaTS SB value not be achieved.	The contract ceiling will be included in the RFP.	General
H.3.1 addresses Set Asides. The passage of the 2015 National Defense Authorization Act allows WOSBs and EDWOSBs to receive sole source contracts as well as those socio-economic groups mentioned above. Therefore, DAI strongly recommends that the sentence above be amended to read: "In the event any set-aside or direct award regulations change during the duration of HCaTS SB, the HCaTS SB CO reserves the right to unilaterally modify HCaTS SB to reflect the change at no additional cost to the Government."	This restriction will be removed in the RFP.	General

Section G.2.6, paragraph six, states, "All costs associated with contractor key personnel duties shall be handled in accordance with the Contractor's standard accounting practices; however, no costs for Contractor Key Personnel shall be billed to the HCaTS Program Management Office (PMO)." Is it permissible to bill the government for costs associated with attending task order kickoff meetings and for activities related to reviewing subcontractor performance?	No. If awarded a contract, Contractors shall not bill the HCaTS PMO for any costs incurred to administer their contract.	General
Section L.3, paragraph five, states, "This solicitation instructs Offerors to provide supporting documentation for practically all pass/fail and scored evaluation criteria. While some sub-sections of Section L may indicate an Offeror shall provide a particular form of documentation for validation purposes, Offerors may provide whatever official, verifiable documentation is necessary to validate any pass/fail or scored evaluation criteria being claimed." Can OPM provide details and/or examples of what they would deem to be official, verifiable documentation and details and/or examples of what they would NOT deem to be official, verifiable documentation?	The RFP will be amended to add examples of what can be submitted as verifiable documentation.	General
Per Section F3, is there an estimate of approximately what proportion of task orders are likely to involve work in locations OCONUS versus CONUS?	The preponderance of the work will be performed in Washington, D.C.	General
L.4.1 : If the Master Table of Contents is to contain all of the documents being submitted, it is impossible to keep it to one page, especially if the font is 12 pt. Will the Government consider increasing the page limit to 3 pages to accommodate the entire listing of files?	This will be revised in the RFP to have no page limitation.	General
Would the OPM be open to online/virtual delivery? We propose this delivery option for three reasons: 1. Online or virtual delivery saves costs in terms of both time and money. Since no travel is necessary, less expense is required to provide learning transfer and coaching. When training is performed remotely, we do not need to factor in travel expenses such as flights, hotels, rental cars, per diems, etc. 2. This also saves the participant time away from work since they can attend right from their desk. 3. The third, and more important reason is that not all people learn at the same pace. Some participants can attend a training session once and master the material. Others need to re-experience material several times in order to retain it. Because online learning is self-paced, students can learn at their own pace, which allows for various learning styles.	The KSAs are inclusive of this type of delivery mode.	General
If the OPM is not open to virtual delivery, would this disqualify Prevail for this offering? Would it be possible to propose a partnering agreement where one firm performs face-to-face delivery and Prevail provides virtual training?	The KSAs are inclusive of this type of delivery mode.	General
Would the OPM consider alternative pricing? As is more standard in our industry, we typically price our services on a per-person, per-course approach instead of hourly rates (with the exception of as-needed coaching services).	The Ordering Contracting Officer will make the determination as to the appropriate contract type to award at the task order level.	General
In section F.5.2 (page 32) the row H.19 states the minimum value of work you must do is \$1.5M for HCaTS SB. But later in the actual H.19 section (page 65) it gives a number of just \$1.0M. Which is it?	The RFP will be amended to correct the discrepancy. The values may change based on additional market research.	General

<p>If some of the requirements for obtaining points are not relaxed or we are not allowed to include subcontractors' capabilities in Relevant Past Experience, there is a chance that we may not be able to meet the requirements to bid as a prime contractor on the Unrestricted HCaTS contract vehicle—despite the fact that we have been an OPM TMA contractor since 1987, and the contract vehicle has been a vital source of work for us. In spite of our ability to successfully perform work for Federal agencies through the OPM TMA vehicle for the past 28 years, the rating scheme as it is currently proposed, combined with the effort and cost required to prepare a proposal, could discourage us from submitting a response to this RFP. In addition, we have already invested a considerable amount of time and money competing and being selected for the last OPM TMA RFP that was cancelled. For these reasons, we may decide that we cannot afford to compete for this revision of the contract vehicle if it appears we are not as likely to be successful. We certainly hope that this is not the case, and that OPM and GSA use our feedback to revise the HCaTS RFP to allow HumRRO and similarly situated companies to compete on a level playing field with larger vendors.</p>	<p>The HCaTS team will amend the RFP to also allow First-Tier Subcontractors to submit experience earned under a Prime Contractor's contract, task order and/or purchase order. All experience performed as a First-Tier Subcontractor will be considered a non-Federal government project.</p>	<p>General</p>
<p>H.7 What types of events or activities are contemplated under the phrase Administration of CAS?</p>	<p>Any event or activity that changes the Contractor's administration of CAS.</p>	<p>General</p>
<p>Reference: "No, Offerors will be differentiated by their past performance" Question: If the main differentiator is Past Performance, would the Government consider making the Volume 4 Accreditations a requirement at the individual task order level as opposed to the current MA-IDIQ level?</p>	<p>All past performance is directly related to each Relevant Experience Project, which can be an IDIQ and/or task order.</p>	<p>General</p>
<p>F.5 Does the requirement only include those systems which meet the CAS? Is the same true for the SB-set aside? It would appear that it doesn't per K.2.5 (page 87)</p>	<p>All requirements that are applicable to your contract shall be maintained throughout the life of the contract. CAS does not apply to small business as per 48 CR 9903.201-1.</p>	<p>General</p>
<p>Is it the Government's intent that proposals will not include a traditional technical approach or management approach as part of the proposal requirements?</p>	<p>Yes</p>	<p>General</p>

We are very skeptical that HCaTS represents an advantage to individual agencies or the government as a whole when compared to Federal Supply Schedule 738X. We see no explanation or justification of any real need for the “down-select” HCaTS represents. We do not believe the following statements from the DRFP to be accurate: “In turn, HRS’ Training and Management Assistance Program (TMAP) ensures the development and delivery of customized human resources, human capital and training products and services to Federal agencies by managing private sector contractors in the design, development, and implementation of solutions in the areas of training and human capital in order to improve agency performance against performance metrics at the employee, unit, and enterprise levels... “Many human resources, human capital and training products and services are offered in the commercial market. However, TMA offers customized solutions that involve modifications to commercial products and services that are sufficiently significant as to alter the characteristics or purpose of the products or services. The products and services delivered under the TMA program focus on federal government requirements and are exclusively provided to federal government customer agencies. In all cases, the project deliverables are customized or designed to meet unique agency specific requirements that cannot be adequately met through the use of off-the-shelf solutions.” To the contrary, we believe that the position expressed is directly contrary to the direction provided by OMB in its Cloud First, Shared First, FedRAMP and HRLoB initiatives. All HCM products and services needed by agencies are readily available through the commercial marketplace as represented by GSA Federal Supply Schedules (including 738X) – the sort of product customization referred to by the DRFP is no longer required in any Federal Government administrative process and the Federal Government clearly can no longer afford such unnecessarily customized products. In today’s world of software and IT systems the solutions are highly flexible and only configuration – not customization – is required. The DRFP’s customization premise is once again a sign of OPM’s legacy viewpoint that is at least 10 years behind what is commercially available.

Thank you for your comment.

General

<p>We believe that if there is to be a fundamental purpose of HCaTS – if it is to have a purpose at all – needs to be articulated with respect to limited highly specialized professional services that do not involve products in any way. In particular, it must be recognized that SaaS is a new form of product delivery, not a new form of professional services delivery and that it is imperative that HCaTS should not be inconsistent or detrimental to certified HRLoB providers. We are troubled by broad statements in the DRFP (and accompanied by equally broad graphic displays) such as, “The scope of KSA 2 is inclusive of, but not limited to, a broad range of human capital and human resources services. These services shall include, as a part of talent management and human capital management, the following:</p> <ul style="list-style-type: none"> • HR strategy • Organizational and position management • Staff acquisition • Performance management • Compensation management (excluding payroll) • HR Development • Employee relations • Labor relations • Separation management. <p>“The scope of KSA 2 excludes payroll processing, benefits management, and personnel action processing, which are provided through Public and Private Shared Service Centers (SSCs).” [Why is this statement limited to only three of the HRLoB services rather than all elements of HRLoB??]. Similarly, we believe the following statements are contradictory and ambiguous: “C.3.3 Information Technology (IT), by legal definition, means any equipment, or interconnected system(s) or subsystem(s) of equipment that is used for the automatic acquisition, storage, analysis, evaluation, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information by a Federal agency. For purposes of this definition, equipment is used by a Federal agency if the equipment is used by the Federal agency directly or is used by a Contractor under a task order with the Federal agency that require its use; or to a significant extent, its use in the performance of a service or the furnishing of a product. IT is considered an ancillary</p>	<p>No comment</p>	<p>General</p>
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<p>Both GSA and OPM must recognize the limitations of their expertise with respect to solutions. Contrary to either explicit or implied positions expressed in the DRFP, OPM's expertise is only in Federal HR policy – OPM has absolutely no expertise – and a proven track record to the contrary – in HR IT or HR business processes. As a result, HCaTS should not include solutions such as administrative operations processes. Avue has repeatedly brought to the attention of GSA, OMB, and OPM itself that OPM has a clear conflict of interest between its policy and products (fee for service). Fee for service activities include so-called “assistive acquisition” or “strategic sourcing” pursuits, which not surprisingly consistently result in the assisted acquisition or “strategic source” being OPM products and services. This conflict of interest is not academic and given the fact that OPM's fee for service operation is \$2 Billion Dollars per year in fees to OPM that is hardly surprising. To give just one example, OPM [policy] auditors are documented to have repeatedly “bad-mouthed” Avue during DEU audits and recommended to Avue agency customers that they purchase a different staffing solution (such as OPM's USAStaffing software). OPM claims of having effective “Chinese walls” in place are demonstrably false. In the Draft RFP, OPM's confused and conflicted role continues, e.g.: B.1.3 – “Under this agreement, GSA's acquisition capabilities, tools and strategic sourcing experience are merged with OPM's expertise in human capital and training to form a more powerful Government solution.” B.3.5 – “OPM will continue to offer high quality products while taking advantage of GSA's ability to provide government-wide cost savings and efficiencies through its federal strategic sourcing expertise. Through this partnership, GSA will be principally responsible for contract administration, while OPM will be responsible for policy oversight.” C.1 – “Human Capital and Training Solutions Small Business (HCaTS SB), through delegated procurement authority and OPM assisted acquisition services [a clearly non-policy role], will provide Federal agencies with both direct access and assisted acquisition access to customized training and development services, human capital strategy services, and organizational performance improvement services.” As a result, we believe that, contrary to the current language of the DRFP, that the analysis and recommendation of IT systems (including SaaS/Cloud) should be expressly excluded from HCaTS.</p>	<p>No comment</p>	<p>General</p>
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<p>The solicitation encourages firms not to partner, which limits the breadth of innovation that will be offered to the government under this solicitation and limits competition from mid-size companies.</p> <ul style="list-style-type: none"> • There are no incentives to develop a team with the skills to support the HCaTS KSAs with the exception of a small business subcontracting plan that may eventually get exercised. <p>Possible mitigation strategies:</p> <ul style="list-style-type: none"> • To encourage subcontracting to highly qualified small businesses and to satisfy the socioeconomic goals of the federal government, it is highly recommended that subcontractor past performance along with qualifications such as ISO and CMMI be accepted to support the “combined team” capabilities and past performance credentials if the “bonus point” system, as currently stated, remains. • Additionally, we would encourage the requirement to submit and “Executive Summary” that provides the team composition and the strengths offered to GSA/OPM by the collective capabilities of the team and supporting small businesses including 8(a), SDVOSB, WOSB, HUBZone, etc., that will demonstrate the commitment to those qualified small socio economic businesses that possess core capabilities required under HCaTS. 	<p>This interpretation is incorrect. All other than small business concerns under the Unrestricted contract vehicle are required to have an approved subcontracting plan incorporated into a resultant contract. Furthermore, Contractors are permitted to form any teaming arrangement at the task order level as permitted by the task order solicitation.</p>	<p>General</p>
<p>What existing contracts do GSA and OPM plan to include in the scope of the HCaTS contract? What agencies that currently have their own contracts within the scope of this contract have committed to using HCaTS in the future versus their own?</p>	<p>No additional contracts will be included in the scope of HCaTS. Currently, no other federal agency has committed to using HCaTS.</p>	<p>General</p>
<p>Our firm concurs with the HCaTS team’s decision to allow First-Tier Subcontractor work to be credited to the Offerors as Commercial Relevant Experience Projects. This approach seems fair and equitable, and will benefit young 8(a) companies that have not yet received the full array of SBA Business Development training for federal sales. Young 8(a) companies often have commercial project references and/or federal subcontractor experience only, so the HCaTS team’s decision here allows even the newest of 8(a) firms to have a chance to participate in HCaTS.</p>	<p>Thank you for your comment.</p>	<p>General</p>
<p>What consideration will be in place regarding FAR Clause 52-208-9 for AbilityOne?</p>	<p>Ordering Contracting Officers have the ability to add this clause at the task order level if they determine ancillary services and supplies can be provided in accordance with 52.208-9.</p>	<p>General</p>
<p>Could you please tell me how many slots each company will have on the Presolicitation Conference for HCaTS on May 14?</p>	<p>One. The new date for the Pre-Solicitation Conference is May 21, 2015.</p>	<p>Industry Day</p>
<p>A notice was posted on fbo stating that a pre-solicitation conference regarding the subject effort is scheduled for or around May 14, 2015. Is the government seeking registration for the pre-solicitation conference at this time?</p>	<p>The HCaTS team has posted on our Interact website at https://interact.gsa.gov/hrfssi and fbo.gov additional details and registration information. The new date for the Pre-Solicitation Conference is May 21, 2015.</p>	<p>Industry Day</p>
<p>I was wondering how to go about registering for the Presolicitation Conference for Solicitation No: GS02Q15CRR0002. Please let me know. Thank you.</p>	<p>The HCaTS team has posted on our Interact website at https://interact.gsa.gov/hrfssi and fbo.gov additional details and registration information. The new date for the Pre-Solicitation Conference is May 21, 2015.</p>	<p>Industry Day</p>

<p>According to a recent GovWin update, "A Presolicitation Conference remains scheduled to be held on or about May 14, 2015." Can the government please confirm if this is the case? If so, will the government please provide registration information for the conference, or when that registration information will be available?</p>	<p>The Pre-Solicitation Conference is scheduled for May 21st. The Government will provide registration information on www.fbo.gov and interact.gsa.gov/hrfssi</p>	<p>Industry Day</p>
<p>Would the Government allow a "consortium" to bid on the small business set-aside (assuming it is within limits), comprising several very small and new (~1 year old) businesses, to propose as a single entity (e.g., under a newly established umbrella company)? If this is possible, would we be able to use qualifications from any of the consortium members, given that they would be affiliates of the company that ultimately holds the contract?</p>	<p>No, the only time an Offeror can use a teammate's past performance is under an existing Joint Venture. When submitting a proposal as a Joint Venture, all Relevant Experience Projects and associated past performance information shall have been awarded under the existing Joint Venture's DUNS Number and not the individual members making up the Joint Venture.</p>	<p>Joint Venture</p>
<p>Section M.7 Discussion. The DRFP only allows for joint ventures (JVs) or CTAs, if they are in place in advance of bidding AND if they use only past performance gained under the JV or CTA. Depending on how established (i.e., FAR Part 19; SBA 13 C.F.R §121.103(h); or the DCAA CAM), JVs may exist for at most three specific or limited-purpose business ventures during a 2- year period, making it impossible to provide the four to six past performances requested. CTAs, formed for the purposes of one contract and dissolved at contract end will not accumulate the necessary four to six past performance references. Suggestion. If it is the Government's intent to allow JVs or CTAs, it seems practicable to allow for the use of relevant experience projects, past performance ratings and accreditations to be allowed from either JV or CTA members in each particular scoring category.</p>	<p>This recommendation was considered but the RFP will not be amended.</p>	<p>Joint Venture</p>
<p>We have provided training services to several federal agencies on the Department of Commerce's National Technical Information Service (NTIS) e-Training Systems Partnership (http://www.ntis.gov/services/partnerships/), which allows federal agencies to engage a contractor's services with a simple Memorandum of Agreement or Interagency Agreement. Contractually, the engagement is considered a Joint Venture Partnership (JVP) between the contractor and NTIS. How will GSA/OPM view an NTIS JVP project in terms of relevant past performance? Is it considered an IDIQ or BPA? Is the contractor still considered the Prime Contractor on NTIS work? Are we allowed to submit more than one NTIS project to satisfy the past performance requirements? Are NTIS projects subject to the FAR provisions listed at the bottom of page 114 because of their method of award, which would limit us to using only one NTIS project per pool (currently there are no FAR provisions listed on NTIS contractual documents)?</p>	<p>The RFP will be amended clarifying that in order for a Relevant Experience Project to count as a Federal project, the Federal agency has to award the contract or task order in full accordance with the FAR.</p> <p>The HCaTS team will amend the RFP to also allow First-Tier Subcontractors to submit experience earned under a Prime Contractor's contract, task order and/or purchase order. All experience performed as a First-Tier Subcontractor will be considered a non-Federal government project.</p> <p>However, when submitting a proposal as a Joint Venture or Contracting Teaming Arrangement (CTA), all Relevant Experience Projects and associated past performance information shall have been awarded under the existing Joint Venture's DUNS Number and not the individual members making up the Joint Venture or CTA. A member of the CTA or Joint Venture may not use a contract or task order awarded to the CTA or Joint Venture on their individual proposal.</p>	<p>Joint Venture</p>

Will the government consider counting past performance of a joint venture as prime contractor past performance, if the prime contractor can show that they performed the relevant work and have CPARS/PPIRS or a past performance substitute form clearly showing the work done by the prime contractor?	When submitting a proposal as a Joint Venture, all Relevant Experience Projects and associated past performance information shall have been awarded under the existing Joint Venture's DUNS Number and not the individual members making up the Joint Venture.	Joint Venture
GSA should permit the capabilities of each member of a joint venture, or the capabilities of subcontractors, to be considered when evaluating proposals.	When submitting a proposal as a Joint Venture, all Relevant Experience Projects and associated past performance information shall have been awarded under the existing Joint Venture's DUNS Number and not the individual members making up the Joint Venture.	Joint Venture
Are the standardized rates (Section J.8) fully burdened?	No, these rates are the direct labor rates only.	Labor Categories
B.3.2 LABOR SUBJECT TO THE SERVICE CONTRACT ACT (SCA) 1. Graphic Designers 2. Human Resources Assistants 3. Instructional Coordinators 4. Technical Writers 5. Training and Development Specialists To the extent that any of the above-mentioned labor categories and/or ancillary labor for services are within the scope of HCaTS and subject to the SCA in accordance with FAR Subpart 22.10 and other applicable agency specific regulatory supplements, the OCO shall identify such work in the task order solicitation and make a determination as to whether SCA wage determinations are to be applied or not. QUESTION: What does this mean?	All SCA labor categories will be removed from the RFP.	Labor Categories
Labor IDs (4.1, 4.2, 4.3, 4.4) for Compensation, Benefits and Job Analysis Specialists are mapped to SOC code, 27-3041. Wouldn't the correct SOC code be 13-1141, Compensation, Benefits, and Job Analysis Specialists?	These labor categories have been mapped to SOC Code 13-1141, Compensation, Benefits, and Job Analysis Specialists.	Labor Categories
Labor IDs (6.1, 6.2, 6.3, 6.4) for Financial Managers are mapped to SOC code, 15-2031. Wouldn't the correct SOC code be 11-3031, Financial Managers?	These labor categories have been mapped to SOC Code 11-3031, Financial Managers.	Labor Categories
Labor IDs (9.1, 9.2, 9.3, 9.4) for Human Resources Specialists are mapped to SOC code, 11-3121. Wouldn't the correct SOC code be 13-1071, Human Resources Specialists?	These labor categories have been mapped to SOC Code 13-1071, Human Resources Specialists.	Labor Categories
J.1 Today's learners expect engaging forms of instruction, ranging from instructor-led, through blended learning, all the way to computer and/or game-based engagements. While IT services are out-of-scope (but could be included as ancillary services), current courseware extensively uses gaming and computer-based instruction, requiring the use of Multimedia Artists and Animators (SOC 27-1014), Software Developer and Application Developers (SOC 15-1132). We recommend adding these labor categories to the HCaTS	Due to the range of ancillary services that could be provided at the task order level, it is not possible to include every possible labor category at the contract level. However, Contractors will be permitted to propose additional labor categories at the task order level to submit a total solution.	Labor Categories

<p>J.1 The current HCaTS labor categories do not include instructors/teachers. We suggest the use of SOC 25-3099 Teachers & Instructors, All Other be included, as well as 25-1199, Post- Secondary Education Teachers, All Other</p>	<p>Some teachers and instructors may be mapped to the HCaTS labor category Training & Development Manager. However, other teachers and instructors are SCA labor categories, and all SCA labor categories will be removed from the RFP.</p> <p>The HCaTS Labor Categories do not represent all possible labor categories that are in scope. Offerors may propose additional labor categories not awarded in the contract at the task order level to provide a total solution.</p>	<p>Labor Categories</p>
<p>J.1 The HCaTS Team deleted (per the latest posted amendment to the DRFP) all SCA labor categories and stated those are now considered “Ancillary” services. However, previous labor ID # 26.1-26.4 could easily be mapped to SOC 13-1151, Training & Development Specialists;, which would be a very welcome and needed labor family to include in HCaTS</p>	<p>All SCA labor categories will be removed from the RFP. This change is not due to all SCA labor categories being considered ancillary.</p> <p>The HCaTS Labor Categories do not represent all possible labor categories that are in scope. Offerors may propose additional labor categories, including SCA labor categories, not awarded in the contract at the task order level to provide a total solution.</p>	<p>Labor Categories</p>
<p>J.1 The HCaTS Team deleted (per the latest posted amendment to the DRFP) all SCA labor categories and stated those are now considered “Ancillary” services. However, previous labor ID # 23.1-23.4, Graphics Designer could easily be mapped to SOC 27-1041, Multimedia Artists and Animators, which would be a very welcome and needed labor family to include in HCaTS. These designers are critical to development and delivery of high-quality instructional content.</p>	<p>Graphic Designers are an SCA Labor Category and all SCA labor categories will be removed from the RFP.</p> <p>The HCaTS Labor Categories do not represent all possible labor categories that are in scope. Offerors may propose additional labor categories, including SCA labor categories, not awarded in the contract at the task order level to provide a total solution.</p>	<p>Labor Categories</p>
<p>J.7 For labor category IDs 1-6, the high-end of the direct labor rate range for Senior level categories equates to the low-end of the direct labor rate range for SME level categories. However, for labor category IDs 7-21, the low-end of the Senior level categories equates to the low-end of the SME level categories. Is this overlap among Senior and SME direct labor rate ranges for labor IDs 7-21 intentional?J</p>	<p>The overlap of \$0.01 will be changed in the RFP.</p>	<p>Labor Categories</p>
<p>Section J.8, concern Direct Labor Rate Ranges. Can OPM/GSA clarify whether the amounts listed for the Minimum and Maximum Direct Labor Rate Range are fully burdened/loaded?</p>	<p>These rates are not fully burdened.</p>	<p>Labor Categories</p>
<p>J.1 We recommend that the Government revise the Journeyman range to accomodate additional rates accompanied by more specific experience requirements. Currently, the DRFP provides four salary levels relating to education and years of experience for the HCATs Labor categories: Junior, Journeyman, Senior, SME. Specifically, the Journeyman experience range is too broadly defined as 3-10 years with a BA/BS or MA/MS degree, which makes it difficult for the offeror to propose an appropriate labor rate.</p>	<p>This recommendation was considered but the RFP will not be amended.</p>	<p>Labor Categories</p>

J.1 Please clarify if the years of experience within the levels are to reflect relevant experience as a manager or experience overall. Currently, the table of Standardized Labor Categories includes several management level positions. GSA is requesting each position be given a rate with respect to Junior, Journeyman, Senior, and SME levels.	This is experience overall.	Labor Categories
Section B.2.5, it reads: "The contractor may provide separate and/or blended loaded hourly rates for Prime Contractor labor/each Subcontractor...". Please verify if the Government will require the Contractor to provide all Subcontractor fully burdened labor rates or just Major Subcontracts (defined as doing more than 25% of the work).	Labor categories and rates shall be proposed and awarded in accordance with the terms and conditions of the task order solicitation.	Labor Categories
Section B.2.5.1 where it addresses "Escalation" – Is it the Government's intention to provide the exact escalation percentages for all future year pricing? Will the Contractor be required to compute the average annual BLS ECI index for the past three years in order to determine the escalation rate? Instead of the average BLS ECI index as the base for escalation, can the Contractor provide their own escalation based upon historical escalation rates?	Yes, the Government will provide the escalation rates and the Contractor/Offeror will not calculate the escalation rate at any time.	Labor Categories
Will the Government consider adding Project Manager and Program Manager to the list of labor categories?	Project managers or Program managers may be mapped to the HCaTS Labor Category: Managers, All Others. The Offeror shall reference the SOC descriptions for each Labor Category when making mapping determinations.	Labor Categories
On page 147, will the Government hold all small businesses (including 8a's) to the profit of no more than 7%?	In accordance with the RFP, Offerors are required to provide clear and convincing rationale for exceeding the 7% threshold.	Labor Categories
Does the Government intend to issue a rate table with specified Labor Categories, or have Offerors provide rates based on the Government's specifications of the Labor Categories?	Yes, Attachments J.7 and J.8 state the required labor categories for HCaTS. Attachment J.7 Cost/Price Worksheet includes the accepted direct labor rate ranges for each labor category. The Offeror will provide the direct labor rates and percentages for cost elements: G&A, Fringe Benefits, Profit, Overhead.	Labor Categories
Section B.2, Task Order Pricing. Will ordering agency contractors have to determine prices are fair and reasonable on each task order, where required by FAR and their agency rules? We appreciate there is no statutory presumption that prices are fair and reasonable, as there is on GSA schedule orders, but profit will have been limited during evaluation of HCaTS contract proposal, contractors will have been required to establish ceiling prices for noncompetitive awards, and escalation will have been limited at contract level. Along the same lines, what is the Agency's authority to limit profit to 7% for each HCaTS labor category? See Section M.8, which refers to Section L.6.2.	Yes, Ordering Contracting Officers shall determine prices fair and reasonable at the task order level. The fully burdened labor rates awarded at the contract level are only used when a sole-sourced Time-and-Materials task order is awarded; therefore, Contractors are permitted to propose profit rates lower or higher than what was awarded in their contract. If a sole-sourced Time-and-Materials task order is awarded, the Contractor shall not exceed 7% at the task order level.	Labor Categories

<p>L.5.5. Will there be ceiling rates for labor under time and materials task order that are competitively bid? Answers to previous questions are not clear: "...the contract ceiling rates will serve the purpose of establishing the ceiling rate at which labor rates can be awarded at the task order level if a Time-and-Materials Sole Source task order is awarded. If these two scenarios do not exist, the contract labor rates can be exceeded, as applicable," But "HCaTS will follow the OASIS model and have an established price range for each labor category. The Government will provide the labor rates, but they have not yet been determined." Will the upper limits for labor rates be the SOC rates, which have now been provided?</p>	<p>The only time a Contractor is prohibited from exceeding their contract ceiling rates is if a sole sourced Time-and-Materials task order is awarded. If this condition is not met, Contractors are permitted to propose labor rates that exceed their contract labor rates for the Ordering Contracting Officer's consideration.</p>	<p>Labor Categories</p>
<p>L.5.5 "These ceiling rates are to be based upon the highest qualified employee within a given labor category or group, working in the highest paid area within CONUS, on a highly complex requirement, excluding Secret/Top Secret/SCI." Q&A "This rate will be the highest that you would charge the Government even if in the past you have charged this rate when a subcontractor did the work." a. Is the "Direct Hourly Rate" an actual rate paid to an actual employee or subcontractor in an actual location? b. If a subcontractor, how can we ascertain how much the employee was paid? May we use what we paid for the subcontractor in lieu of direct hourly rate with loads? c. If the rate is an actual rate, is any documentation showing that rate was actually required? If so, what kind of documentation is required? d. If a contractor has not paid actual employees or subcontractors in a labor category, may the contractor use that rate as a contract, as opposed to an ancillary, rate in bidding on task orders? e. Is the "most highly qualified" person the most highly paid person? f. If the rate is NOT an actual payment, is it a market projection? If it is a market projection, is any documentation of the basis of the projection required? If so, what kind of documentation is required?</p>	<p>The only time a Contractor is prohibited from exceeding their contract ceiling rates is if a sole sourced Time-and-Materials task order is awarded. If this condition is not met, Contractors are permitted to propose labor rates that exceed their contract labor rates for the Ordering Contracting Officer's consideration.</p> <p>When proposing the fully burdened rates, Offerors need to make several business decisions, in addition to complying with their accounting system. The Offeror will have to submit documentation justifying a cost element that exceeds a threshold prescribed in the RFP for our consideration. If the Offeror's proposed rates do not exceed any thresholds, no additional documentation is required.</p>	<p>Labor Categories</p>
<p>Recommend that HCaTS allow for a profit rate up to 10 percent consistent with the FAR as an incentive for industry. A lower cap of 7 percent could have the unintended consequence of incentivizing vendors to promote use of competing contracts in cases where the 7 percent cap is unrealistic.</p>	<p>Offerors are permitted to propose a profit rate that exceeds the 7% threshold and submit documentation to substantiate the reason(s) why for our consideration. Furthermore, the profit ceiling awarded at the contract level is only applicable to a sole-sourced Time-and-Materials task order. Otherwise, Contractors are permitted to propose any profit rate for the Ordering Contracting Officer's consideration.</p>	<p>Labor Categories</p>
<p>Once the final RFP for HCaTS is released, we request that all amendments specify the changes to the solicitation as a result. Contractors report that it was extremely challenging to manage all of the electronic amendments for OASIS. Improved organization in this process will help to control contractors' bid and proposal costs in response to the HCaTS solicitation.</p>	<p>Any amendments after the Final RFP is posted will be identified in Section L, 52.252-3. Offerors are required to read the Final RFP in its entirety, with the understanding that there will be many changes in it from the DRFP.</p>	<p>Labor Categories</p>

<p>L.3.2 If a contract has been novated or otherwise transferred to the Offeror, along with the staff that performed the work, the Offeror should be able to claim credit for all the work performed, not just that work performed since novation. This would bring the scoring criteria in line with Section L5.1.7 where a subsidiary defers its credit to the Parent under the “meaningful relationship” Corporate structure provision.</p>	<p>The RFP will be amended to state that the meaningful relationship under a Corporate Structure shall have been in place at time of contract and/or task order performance.</p>	<p>Meaningful Relationship</p>
<p>Would the Government please amend the RFP document as follows:</p> <ul style="list-style-type: none"> <input type="checkbox"/> In the Full & Open track of HCaTS, please remove the requirement that states “the Offeror shall have performed six Relevant Experience Projects, with four of those Relevant Experience Projects under a NAICS Code that corresponds directly to a NAICS Code in the Pool being applied for (see NAICS Code Pool Table below).” <input type="checkbox"/> Remove the NAICS Code Pool Table in its entirety. <input type="checkbox"/> Instead, emphasize that all six Relevant Experience Projects must be in scope of at least one Key Service Area (KSA). 	<p>We believe that the structure prescribed in the RFP treats all Offerors equitably at the contract and task order level in a clear and consistent manner, allowing the Government to determine the business size at the contract level and task order level consistently.</p> <p>In addition, without this requirement there is a greater probability of the same Offerors winning awards in both Pools.</p>	<p>NAICS</p>
<p>REFERENCE: Draft Section J.10 NAICS Code Re-Determination Form; Page 1 OFFEROR COMMENT/QUESTION: Discussion: On April 3, 2015, the Government issued Section J attachments to the Draft RFP which included Section J.10 “NAICS Code Re-Determination Form.” This Form states: “Contracting Officers: You are receiving this form because the Offeror cited in Section I claims that the majority of the work performed on the contract or task order cited in Section II-A falls within one of the NAICS codes listed in Section II-E, and not the reported NAICS Code. The Human Capital and Training Solutions (HCaTS) team is asking that you, as duly warranted Contracting Officer of the contract or task order cited in Section II-A, certify that the scope of the contract or task order falls within one of the NAICS codes in Section II-E, and not the reported NAICS Code.” The above statement appears to be asking the Contracting Officer to make a re-determination of the appropriate NAICS code for the work performed under the cited contract; an action which is not legally permissible. For the HCaTS RFP, the only issue at-hand is an inaccurate reporting in FPDS of the correct and original NAICS Code assigned to the contract/task order cited as past performance at the time of its solicitation, not a re-determination of the NAICS Code. These solicitations/contracts are a matter of public record and easily verified. There should be no need for a warranted Contracting Officer to be involved or to certify. Question: Would you consider requiring Offerors who have a past-performance contract citation with a NAICS Code that has been incorrectly reported in FPDS to submit the page(s) from the original solicitation and/or contract which reflects the correct NAICS Code vs the one inaccurately reported in FPDS?</p>	<p>Yes. The RFP will be amended allowing Offerors to submit contractual documents to substantiate NAICS Codes. In addition, the RFP will have an order of precedence so Offerors know which documents we will consider over others. For example, if FPDS-NG has a different NAICS Code then the contractual documents, the NAICS Code identified in the contractual documents will be used. On the Self-Scoring Worksheet (J.5.1 and J.5.2), the Offeror will select the document that is validating the NAICS Code based on the order of precedence.</p>	<p>NAICS</p>

<p>Will the government consider adding NAICS code 611310 to the eligible codes for qualification in pool 1? Many contracts for customized training & development services (KSA #1) are awarded under this NAICS code and should be considered when evaluating eligibility for pool 1.</p>	<p>The HCaTS PMO chose the NAICS Codes that best fit the work that represent the scope of all three KSAs. As per the definition of this NAICS Code, we have determined it does not fit the scope of HCaTS.</p>	<p>NAICS</p>
<p>Will GSA eliminate NAICS Code 624310, Vocational Rehabilitation Services, from the procurement? According to the U.S. Census Bureau, the NAICS code applies to organizations that provide job training to the unemployed or to those who are underemployed due to job market disadvantages. This focus appears inconsistent with the scope of HCaTS. OPM and GSA have expressed that the intent of the HCaTS contract is to address the human capital and training requirements of the existing federal workforce. Neither agency has indicated that an objective of the contract is to train individuals to be eligible for federal employment or to be eligible for a better federal position. This is the focus of organizations that provide Vocational Rehabilitation Services. Preparing an individual for a position is significantly different than improving the individual's skills or performance. If the goal of the HCaTS procurement is the latter and not the former, the assignment of the NAICS Code 624310 will not attract the appropriate industry partners.</p>	<p>NAICS Code 624310 Vocational Rehabilitation Services is used when providing training, career counseling and placement for returning veterans. This is within scope of HCaTS and allows for work done by our customers helping veterans.</p>	<p>NAICS</p>
<p>We have multiple relevant projects reported in PPIRS with NAICS codes not in the HCaTS pools, but with contract documents (SF 1449) that identify HCaTS pool NAICS codes. If the NAICS codes reported in the PPIRS and/or FPDS-NG report differ from the NAICS code listed on the contract award documents or solicitation documents, how will the primary NAICS code for the work be determined?</p>	<p>The RFP will be amended allowing Offerors to submit contractual documents to substantiate NAICS Codes. In addition, the RFP will have an order of precedence so Offerors know which documents we will consider over others. For example, if FPDS-NG has a different NAICS Code then the contractual documents, the NAICS Code identified in the contractual documents will be used. On the Self-Scoring Worksheet (J.5.1 and J.5.2), the Offeror will select the document that is validating the NAICS Code based on the order of precedence.</p>	<p>NAICS</p>
<p>Previous versions of the HCaTS procurement documents indicated that an email from a duly warranted contracting officer was acceptable evidence of a change in the primary NAICS code for a relevant experience project, however now attachment J.10 provides a form to be filled out. Will the government still accept emails provided from the contracting officer in lieu of the form since the emails have already been provided to the offeror?</p>	<p>No, the Offeror must have a Government Assessing Official use Attachment J.10 NAICS Code Confirmation Form if they are requesting that the NAICS Code for the Relevant Experience Project be considered as a different one than the contract or task order was originally awarded under.</p>	<p>NAICS</p>
<p>L.5.2 To ensure the broadest qualified competition for the HCaTS program—supported by objective demonstration of similar work related to HCaTS-identified NAICS codes—we recommend that the Government consider adding the following NAICS codes for this solicitation: Pool 1 : 611430,611699,624310, 541330, 541710, 611710 AND Pool 2: 541611, 541612, 541613, 541618, 611710, 541330, 541710, 541330, 541690, 541614</p>	<p>This recommendation was considered but the RFP will not be amended.</p>	<p>NAICS</p>
<p>Section G.2.4, paragraph three, line item four, states, "Issuing task order solicitations under the proper NAICS Code and corresponding HCaTS Contract Number (See Section H.4 (NAICS))." Does a contractor have to have an on-file NAICS code that matches the one selected by the Ordering Contracting Officer (OCO) in order to respond to a task order?</p>	<p>No.</p>	<p>NAICS</p>

<p>Recommend: 1) H.1.4: Add 541910 to the list of Pool 2 NAICS codes. GSA provides a list of NAICS codes in each contemplated pool. While we certainly agree that HCaTS relevant work could be conducted under any of the currently listed NAICS codes, we find this list to be incomplete. More specifically, our firm has conducted substantial research (and related consulting) under NAICS code 541910 to support a number of KSA's within the HCaTS scope including research on work life balance, performance measurement and reporting, and recruitment and outreach. As such we urge GSA to add 541910 to the list of HCaTS SB NAICS Codes specified in H.4.1.</p>	<p>This recommendation was considered but the RFP will not be amended.</p>	<p>NAICS</p>
<p>L.5.2, We recommend that NAICS requirements for past performance credentials be removed. The combination of NAICS and KSA requirements for each pool in the past performance section is overly complex and confusing. As both the NAICS and KSA requirements are similar in their relation to the type of services provided over the course of a contract, only one set of requirements is needed. Any types of services reflected in the NAICS requirements but not the KSA requirements could be added into the latter. The simplification would reduce the risk of qualified vendors submitting non-compliant RFP responses, and would enhance HCaTS PMO ability to review and award contracts to the most qualified Offeror.</p>	<p>This recommendation was considered but the RFP will not be amended.</p>	<p>NAICS</p>
<p>H.4.1 Suggest that NAICS codes should determine size standard at the TO level and should not be mapped to KSAs at IDIQ level.</p>	<p>This recommendation was considered but the RFP will not be amended.</p>	<p>NAICS</p>
<p>NAICs codes should only be used to determine the bidder's size standard and not to define scope or as a criterion for past performance. They should be applied at the task order level. Clear guidance is also needed impacting how NAICs codes applied to IDIQ contracts and schedules are applied.</p>	<p>A Relevant Experience Project's NAICS Code that is from a task order that is off of an IDIQ contract, will be determined based on the NAICS Code that the task order was awarded under.</p>	<p>NAICS</p>
<p>H.4.1 Please clarify the NAICS codes for all current and previous work performed under the existing OPM/TMA contract. Also, please clarify whether the IDIQ NAICS codes or Task Order NAICS codes (unassigned at this time) can be used and when (i.e., specific dates) such assignments would be applied to existing / previous task orders. These clarifications are critical since the current DRFP language would render much of an offeror's existing OPM / TMA past performance as ineligible or unacceptable, even though the work is highly relevant to human capital and training key service areas.</p>	<p>The current OPM contract vehicle assigns NAICS Code 541611 to all task orders. Under HCaTS, the Ordering Contracting Officer will choose the appropriate NAICS Code that makes up the predominant amount of work at the task order level and award under that specific NAICS Code.</p>	<p>NAICS</p>

<p>J.10 appears to be asking the Contracting Officer to make a re-determination of the appropriate NAICS code for the work performed under the cited contract; an action which is not legally permissible. By regulation, the contracting officer is required to “determine the appropriate NAICS Code and related small business size standard and include them in solicitations.” 48 C.F.R. (“FAR”) 19.303(a)(1). Thus, the required time for determining the applicable NAICS Code is at the time of solicitation, 13 C.F.R. 121.402(b), not after contract award. The NAICS code assigned to a procurement, and its corresponding size standard, is final unless timely appealed to SBA’s Office of Hearings and Appeals. FAR 19.303(c); 13 C.F.R. 121.402(d). Question: Are you asking the Contracting Officer to make a determination to CHANGE the NAICS from what was originally assigned?</p>	<p>Attachment J.10 NAICS Code Confirmation form will be amended in the final RFP to state that this redetermination is solely for the purposes of the evaluation of HCaTS and any redetermination will not require of the Contracting Officer to take any action or make any changes in the original contractual documents or how it was reported in PPIRS and FPDS-NG.</p>	<p>NAICS</p>
<p>J.10 appears to be asking the Contracting Officer to make a re-determination of the appropriate NAICS code for the work performed under the cited contract; an action which is not legally permissible. For the HCaTS RFP, the only issue at-hand is an inaccurate reporting in FPDS of the correct and original NAICS Code assigned to the contract/task order cited as past performance at the time of its solicitation, not a re-determination of the NAICS Code. These solicitations/contracts are a matter of public record and easily verified. There should be no need for a warranted Contracting Officer to be involved or to certify. Question: Would you consider requiring Offerors who have a past-performance contract citation with a NAICS Code that has been incorrectly reported in FPDS to submit the page(s) from the original solicitation and/or contract which reflects the correct NAICS Code vs the one inaccurately reported in FPDS?</p>	<p>Yes. The RFP will be amended allowing Offerors to submit contractual documents to substantiate NAICS Codes. In addition, the RFP will have an order of precedence so Offerors know which documents we will consider over others. For example, if FPDS-NG has a different NAICS Code than the contractual documents, the NAICS Code identified in the contractual documents will be used. On the Self-Scoring Worksheet (J.5.1 and J.5.2), the Offeror will select the document that is validating the NAICS Code based on the order of precedence.</p>	<p>NAICS</p>
<p>Are offerors required to provide products/services for all HCaTS SB NAICS Codes associated with the pool they are submitting a RFP response to, or is providing products/services only for certain NAICS Codes acceptable?</p>	<p>Yes, an Offeror only needs to submit Relevant Experience Projects in one Pool NAICS Code in the Pool(s) that they are applying for. Four Relevant Experience Projects must have been performed in a Pool NAICS Code, but they are allowed to all be for the same Pool NAICS Code.</p>	<p>NAICS</p>
<p>We remain strongly opposed to the use of NAICS codes as experience-based screens associated with the general HCaTS contracts—we think they should be associated exclusively with specific task orders. However, if NAICS codes as used as proposed, we argue for replacing 541613 (Marketing Consulting Services) with 541720 (Research and Development in the Social Sciences and Humanities). In our experience, 541720 better captures the nature of the work performed under the current TMA vehicle as well as the KSAs proposed under HCaTS.</p>	<p>This recommendation was considered but the RFP will not be amended.</p>	<p>NAICS</p>
<p>Regarding past performance, in section L.5.2 Volume II (Pool Application and Certification) you require specific NAICS codes for four of six Relevant Experience Projects. The recent OPM TMA contract and task orders received through it did not have NAICS codes associated with them. Will work performed for Federal agencies through OPM TMA count as past performance with the appropriate NAICS codes? Will we be able to obtain a NAICS code for the projects we have performed through OPM TMA?</p>	<p>Offerors have the opportunity to request a Contracting Officer redetermine a NAICS Code using J.10 NAICS Code Confirmation Form if the Offeror believes the originally awarded NAICS Code was incorrect. In addition, NAICS Codes can also be substantiated through the PPIRS Report, Past Performance Substitute Form and additional contractual documents.</p>	<p>NAICS</p>

<p>H.4.1 Would the government consider removing NAICS codes from bid requirements, and not awarding additional points for NAICS, as they are not relevant to the work performed, and used for no other reason than industry reporting? Justification/Reason/Explanation: Placing importance on an offeror's NAICS code as opposed to the actual key service areas delivered results in the government evaluating a factor (NAICS codes) that is immaterial. Further, using NAICS codes as a pool qualification requirement may restrict highly qualified offerors from bidding or presenting their most relevant projects for evaluation. For example, work performed under the current OPM TMA bridge contract is reported in FPDS under NAICS 511210, which is not associated with either HCaTS pool. Eliminating NAICS codes for pool qualification and evaluation will allow offerors to submit their most relevant projects and for the government to evaluate those projects. Instead, we recommend the government evaluate projects according to the key service areas performed, and enable additional points for performing multiple KSAs. We recommend the government remove any evaluation or additional points relating to NAICS codes.</p>	<p>The RFP will be amended removing the additional scores assigned to NAICS Codes.</p>	<p>NAICS</p>
<p>Do the Offeror's Past Performance to satisfy the NAICS requirements, have to been the same Past Performance entries supplied for the cross-walk to the KSAs and additional points related to contract value and duration?</p>	<p>All Relevant Experience Projects must meet the minimum requirement. One of the minimum requirements is that the contract or task order represent at least one KSA. However, only four Relevant Experience Projects must have a Pool NAICS Code.</p>	<p>NAICS</p>
<p>Please reconsider the decision to give offerors extra points if they can present contracts in more than one NAICS. NAICS do not reliably represent the type of work done on a government contract, and the decision to use a NAICS for that purpose is arbitrary. a. Contracting officers can assign one and only one NAICS to any award. Contractors are asked to present complex, multidisciplinary projects to compete for HCaTS. Because only one NAICS can be assigned to those projects, some of the activity in those projects will necessarily not be shown. b. Furthermore, NAICS assignments are sometimes wrong, as SBA's size standard protest cases show, and frequently arbitrary, as academic work in government contracting as shown (see http://acquisition.gov/COMP/aap/documents/Chapter7.pdf, page 442, finding 7, showing that a large number of Defense procurements had been incorrectly classified as "soybean farming" in FPDS-NG, because the NAICS code for soybean farming is the first in the NAICS code list). We appreciate that GSA has offered contractors an opportunity to request COs to "correct" the NAICS assigned to their contracts, but COs are not required to do so. Changing a NAICS is administratively burdensome and in some cases would cast into question the basis for a small business set-aside, so this remedy does not provide a meaningful resolution of the issue.</p>	<p>This scoring element has been removed from the final RFP.</p>	<p>NAICS</p>

<p>Section L.4.1, L.5.1.9.2. The proposal format table lists SAM registration as a file (ABC.VOL1.SAM.pdf) in volume 1. What specifically is to be included in this file? Are you asking for a printout of all sections of the Offeror's SAM registration? The referenced section L.5.1.9.2 just states that, "For each Pool applying for, the Offeror's System for Award Management (SAM) representations and certifications shall include the predominant NAICS Code (611430 and/or 541611)."</p>	<p>Yes, Offerors shall submit their full SAM record, with the SAM record having at a minimum the predominant NAICS Code under the Pool applying for.</p>	<p>NAICS</p>
<p>Is it necessary to use both a Pool (H.4.1) and KSA structure (C.1.1; C.3.1; C.3.1.2; C.3.1.3) when agencies frequently use the most general NAICS codes in the HR/HCM area, particularly for larger tasks that encompass multiple NAICS code areas? Would the Government consider simplifying the final RFP by using the KSA groups and removing the Pools?</p>	<p>This recommendation was considered and the RFP will not be amended.</p>	<p>NAICS</p>
<p>NAICS/KSA Requirements (L.5.2): We recommend that NAICS requirements for past performance credentials be removed. The combination of NAICS and KSA requirements for each pool in the past performance section is overly complex and confusing. As both the NAICS and KSA requirements relate to the type of services provided over the course of a contract, only one set of requirements is needed. Any types of services reflected in the NAICS requirements but not the KSA requirements could be added into the latter. The simplification would reduce the risk of qualified vendors submitting non-compliant RFP responses.</p>	<p>We anticipate under both contract vehicles Offerors submitting one proposal under both Pools. Requiring Offerors to have at least four Relevant Experience Projects with an associated NAICS Code from the Pool applying under will reduce the possibility of the same Offerors winning under both Pools. Therefore, under the Unrestricted Contract Vehicle, mid-sized companies have a better chance of having a contract awarded, and under the Total Small Business Set-Aside Contract Vehicle the very small companies have a better chance of having a contract awarded.</p>	<p>NAICS</p>
<p>H.4.1 In Pool 1, NAICS codes 611699 and 624310 are subsets of 611430. If the government includes and assigns points to these subset NAICS codes, they will be providing an unfair advantage to niche training vendors. This will put companies providing full-service training capabilities at a disadvantage; this seems contrary to what OPM would want and what would be in the best interest of this contract. We suggest that GSA remove NAICS codes 611699 and 624310 as they are merely subsets of 611430.</p>	<p>The scoring element tied to NAICS Codes will be removed from the RFP.</p>	<p>NAICS</p>

<p>L.2.4, L.5.2, and M.7 This potential offeror has concern with the use of the separate NAICS codes and their application to the past performance evaluation criteria. There are several reasons for our concern.</p> <p>(1) According to the United States Census Bureau, the North American Industry Classification System (NAICS) is the standard used by Federal statistical agencies in classifying business establishments for the purpose of collecting, analyzing, and publishing statistical data related to the U.S. business economy. The generally held opinion is that the NAICS categories and definitions were not developed to meet the needs of procurement and/or regulatory applications. This is evidenced by the fact that companies select their own NAICS codes based on the work they perform. There is no central government agency with the role of assigning, monitoring, or approving NAICS codes for establishments. Individual establishments are assigned NAICS codes by various agencies for various purposes using a variety of methods. Therefore, the idea of assigning evaluation points on a major competitive procurement based on the use of a system that is applied through a variety of methods is extremely concerning and highly subjective.</p> <p>(2) The application of points for having multiple NAICS codes on relevant projects could unjustly penalize offerors. Often, work can easily fall under several NAICS codes. For example, a task order performed under NAICS code 541611 could also encompass work that falls under 541618. Assume that an offeror holds an ID/IQ contract under NAICS code 541618, and that contract has numerous task orders competed on it. The contract and task orders themselves are relevant to HCaTS and the KSAs. However, the contracting officer may have chosen to simply use the NAICS code for the main contract on the individual task orders, even if the work entailed on the task order could fall under other NAICS. In this scenario, if the offeror were to use these past projects as relevant references, they will garner as many evaluation points as they would if the contracting officer had selected different NAICS codes for the task orders. This penalizes the offeror for a decision made by a previous contracting officer.</p>	<p>The scoring element tied to NAICS Codes will be removed from the RFP.</p>	<p>NAICS</p>
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<p>(3) The DRFP states, "The NAICS Code shall be validated by either the past Performance Retrieval System (PPIRS) Report or Attachment J.6 (Past Performance Substitute Form)." If there is no PPIRS report and no completed Attachment J.6, "the Federal Procurement Data System-Next Generation (FDPS-NG) Report shall be used to validate the NAICS Code. However, this offeror has examined their own PPIRS and FPDS reports and has found conflicts between the two. Therefore, there is not a reliable form of verification.</p> <p>(4) There is a stipulation in the DRFP that is meant to provide an offeror with an avenue to correct an incorrectly reported NAICS code. However, a contracting officer is required to sign a letter stating that they incorrectly reported a NAICS code. It is our opinion that contracting officers will not do this. In most instances, it won't be a case of an incorrect NAICS, but more likely a case of more than one applicable NAICS code. We suggest one of four methods to allow GSA and OPM to ensure they fairly and objectively rate and score past performance and relevant work.</p> <ol style="list-style-type: none"> 1. Remove the use of NAICS codes in the assignment of points for past performance. The primary concern of the government should be on successful performance of relevant work. This can be done by requiring a mapping of the actual work performed to the work required by the HCaTS solicitation. 2. Allow offerors to self-certify their relevant experience projects under one of the NAICS codes listed in L.5.2. In this case, the government could require a brief explanation as to applicability of the selected NAICS code. 3. Allow a letter from a contracting officer that states the applicable NAICS code for a relevant project, without requiring the contracting officer to declare the initial NAICS code to be incorrect. 4. Award substantially more points for the predominant NAICS code in each Pool. 	<p>The RFP will be amended to state the order of precedence in establishing the NAICS Code for the contract or task order if there is a discrepancy between, PPIRS, FPDS-NG, and Contractual Documents. The order of precedence is first the contractual documents, FPDS-NG Report, PPIRS Report. If the Offeror has the Contracting Officer use J.10 NAICS Code Confirmation Form, then that will be the document that determines the NAICS Code. The language in the final J.10 will be amended to state that the NAICS Code determination is solely for evaluation purposes for HCaTS and does not change any official contractual documents nor reports.</p>	<p>NAICS</p>
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<ul style="list-style-type: none"> Reduce the Number of NAICS Code Restricted Projects to Two or Three. Draft RFP Section L.5.2 requires that “the Offeror shall have performed six Relevant Experience Project, with four of those Relevant Experience Projects under a NAICS Code that corresponds directly to a NAICS Code in the Pool being applied for...” GSA and OPM have received ample feedback from industry that NAICS code are not a valid indicator of the nature of work performed and thus potentially misleading. Entire contracts routinely use a common NAICS code regardless of the specific nature of the task orders issued. This is the case for the OPM TMA vehicle currently, even though some task orders under that contract would be more accurately classified under other NACIS codes. NAICS codes are assigned by Contracting Officers but do not necessarily reflect the totality of the work performed or even the primary focus of the work, especially on larger, longer-term projects that have evolved over time to meet changing agency requirements. Thus, GSA and OPM know in advance that an overreliance on NAICS code as a defining requirement/structure of the RFP is fundamentally misleading and distorting to the competitive process. Reducing the number of “Relevant Experience” projects having a NAICS code corresponding to one of those listed for that Pool to two or three would minimize this distortion and allow for greater competition. As GSA itself as noted, the KSAs provide a better basis for evaluating the relevance and applicability of a given project than the NAICS code. 	<p>This recommendation was considered but the RFP will not be amended.</p>	<p>NAICS</p>
<p>(Section M.6.3), p. 140 What are the NAICS codes for the full-and-open compete?</p>	<p>They are the same as the NAICS Codes under the Set-Aside Contract Vehicle</p>	<p>NAICS</p>

<p>NAICs and the Evaluation Methodology</p> <p>We oppose the NAICs code point scoring system for Relevant Experience Projects. The basic procurement purpose of NAICs is to determine an offeror's size status not to evaluate the relative quality of proposals. Using the NAICs for evaluation purposes emphasizes form over function. It is merely a number crunching exercise that is dependent on the vagaries of past NAICs assignments to contracts across the Federal enterprise. Experience shows that assignment of NAICs to contracts is often an arbitrary, paperwork exercise reflecting agencies' understanding of the process and its reporting needs. As such, the data on NAICs is not reliable for evaluation purposes. Although a NAICS Redetermination form has been included in Section J, we do not believe that it is appropriate to request contracting officers to reassign NAICS codes for purposes of a source selection evaluation under another procurement. In addition, use of NAICs in the evaluation presents the following challenges and/or anomalies: There are multiple NAICs well beyond those currently identified in the DRFP that have been assigned to work corresponding to the Knowledge, Skills and Abilities (KSAs) identified in Section C. As a result, offerors with work corresponding to the KSAs but assigned a NAICs outside the DRFP are at a disadvantage. Moreover, it limits access to potentially relevant work that OPM should consider in seeking contractors that can best meet customer agency needs. Different NAICs were and have been assigned to the previous TMA contract and the current bridge contract than those listed in the DRFP. As a result, offerors who performed work directly corresponding to KSAs under OPM's prior contract vehicle are competitively compromised. Commercial work corresponding to the KSAs is at a disadvantage relative to work for the Federal Government. This disadvantage is reflected in the requirement to have the commercial customer address the applicable NAICs as part of the waiver form provided in the DRFP. It is an additional administrative burden tied to submission of commercial projects for evaluation purposes. Theoretically, accepting GSA and OPM's rationale that the NAICs listed in the DRFP reflect the work being performed more so than use of the KSAs amounts to double counting relevant experience in a manner that adds no true relative value to the evaluation of proposals. The overarching goal of all procurements is to acquire the products, services and solutions to meet the needs of customer agencies and,</p>	<p>Points associated with NAICS Codes will be removed from the RFP.</p>	<p>NAICS</p>
<p>Commercial Past Performance - We appreciate GSA's efforts to allow credit for commercial past performance through the addition of the Past Performance Substitute Form in Section J. However, the DRFP still has barriers to the inclusion of commercial past performance due to the bureaucratic nature of the form. Offerors must have their commercial customers certify to the applicable NAICS code and assess their work in areas that do not necessarily apply to the commercial market. An example is "Utilization of small business" which references specific small business categories relevant to the Federal market. Further, the form does not include a description of the NAICS codes. As a result, HCaTS still favors government work largely because NAICS codes are driving the scope of the contract. Rather than requiring commercial customers to certify to specific NAICS codes, the Coalition recommends that past performance be tied to the KSAs in order to increase innovation and competition.</p>	<p>The RFP will be amended to include a description of the NAICS Codes. We disagree with your interpretation that NAICS Codes are driving the scope. Rather, we chose the NAICS Codes that most appropriately fall within the KSAs. All past performance is tied solely to the Relevant Experience Projects, which need to be inclusive of at least one KSA. Requiring at least four Relevant Experience Projects match at least one of the NAICS Codes reduces the risk of very large companies winning contracts under both Pools.</p>	<p>NAICS</p>

<p>The solicitation rewards firms with relevant experience in more than one NAICS code, but intends to categorize all work under the contract by one of 2 predominant NAICS codes. TMA vendors will be disadvantaged by the fact that ALL TMA work is recorded in FPDS as 611430 (training), regardless of which side of the vehicle the TO was completed on</p> <ul style="list-style-type: none"> • Companies get up to 400 bonus points for having more than one NAICS code. For many IDIQ contracts (including TMA), the same NAICS code is used for every task order. Because of this, companies could be missing out bonus points if they use multiple TMA task orders as past performance. Conversely, the largest federal contractors (Booz, Lockheed, etc.) would have the greatest chance of receiving the 400 points just based on the volume of contracts they could choose from. • Additionally, all of the task orders on the original TMA contract (including work on the Human Capital key service area) were coded with 611430 (Training). Because the original TMA solicitation listed 541611 as the primary NAICS, we believe that this code has been erroneously applied to Human Capital task orders. Since 611430 is the primary NAICS for Pool 1: Training/Learning, this error would prevent us from using these TMA task orders as past performance for Pool 2: Human Capital. <p>Possible mitigation strategies:</p> <ul style="list-style-type: none"> • Remove the bonus points associated with multiple NAICS codes, while keeping in place the bonus points associated with multiple KSAs. This ensures breadth of experience in projects directly relevant to HCaTS, while removing the competitive barrier for mid-size companies and TMA incumbents. 	<p>The RFP will be amended removing points earned for NAICS Codes. The Contracts will be awarded under the predominant NAICS Code, but the Task Orders may be solicited and awarded under any of the Pool NAICS Codes that are in the Pool that it was released under.</p>	<p>NAICS</p>
<p>Section L.5.2.3.3 on pg. 119. "In addition, for each Pool applied for the Offeror will receive additional points if the cumulative of all Relevant Experience Projects exceeds one validated Pool NAICS Code. Points will be applied in a tiered system that increases with the number of additional validated Pool NAICS Code(s) represented."</p> <p>NAICS code does not necessarily mean that the work performed is directly relevant to the HCaTS KSAs. Additionally, all of the task orders on the 2007 TMA contract (including work on the Human Capital key service area) were coded with 611430 (Training).</p> <p>Will the government consider removing the bonus points associated with multiple NAICS codes, while keeping in place the bonus points associated with multiple KSAs? This ensures breadth of experience in projects directly relevant to HCaTS, while removing the competitive barrier for mid-size companies and TMA incumbents.</p>	<p>Points associated with NAICS Codes will be removed from the RFP.</p>	<p>NAICS</p>

<p>Would the Government consider adding NAICS code 511130 (Publishing) to the RFP?</p> <p>Due to the large amount of training workbooks likely to be purchased through this vehicle we thought we would ask. In many of the training contracts we have delivered on over the last 20 years the overall cost of the student workbooks is significantly higher than the services to design and deliver the training itself. We are seeing more and more solicitations being released under the 511130 NAICS instead of 611430.</p>	<p>This recommendation was considered but the RFP will not be amended.</p>	<p>NAICS</p>
<p>Will the government allow more than two relevant experiences outside of the NAICS code pools?</p>	<p>Offerors are permitted to have no more than two Relevant Experience Projects per Pool not match one of the eight NAICS Codes identified in the DRFP.</p>	<p>NAICS</p>
<p>In lieu of tying past performance to the performance of functions under a limited number of NAICS codes, GSA and OPM should eliminate the NAICS code requirement for eligible past performance and evaluate offeror eligibility and past performance relevance tied only to the KSAs.</p>	<p>Past performance is tied solely to the Offeror's performance of a project that is inclusive of at least one KSA.</p>	<p>NAICS</p>
<p>If GSA and OPM insist on retaining the NAICS code approach to determining eligibility, then the number of NAICS codes listed in each pool should be significantly increased so that those with clearly relevant and successful experience not be unfairly disadvantaged. For example, GSA and OPM should consider relying on the four digit NAICS codes, not the six digit NAICS codes, in each pool. As stated above, PSC recommends that eligibility and past performance be based on the performance of the KSAs, and not the short list of NAICS codes included in the Draft RFP.</p>	<p>The chosen NAICS Codes reflect what future task orders' predominant work may be under the scope of HCaTS.</p>	<p>NAICS</p>
<p>GSA must clarify, and preferably provide examples of, how non-federal projects here the offeror self-certifies the NAICS code will be scored.</p>	<p>Because the commercial sector does not have an FPDS or PPIRS equivalent systems, and if no Past Performance Substitute Form is completed, Offerors are permitted to self-certify non-Federal projects. We recognize that this cannot be done for federal projects, which is a contributing factor in federal projects having additional points assigned to them.</p>	<p>NAICS</p>
<p>4. Page 47 and 48 of 144 . . . H.3 Ordering Procedures reads . . . "All task orders under HCaTS contracts shall: . . . Be solicited and awarded under the proper NAICS Code and corresponding Contract Number (see Section H.4 (North American Industry Classification System))</p> <p>Comments/Suggestions: The NAICS code system is very subjective. Who, within the government, will be responsible for determining the "proper" NAICS code?</p>	<p>A duly warranted Contracting Officer that awarded and/or administered the contract or task order.</p>	<p>NAICS</p>

<p>5. Page 48 of 144 . . . H.4.1 HCATS NAICS CODES provides the following table . . . Comments/Suggestions: The work required under HCaTS (and its predecessor TMA) is expansive. The government is looking for contractors that provide expansive capabilities as demonstrated in the KSA listing, yet GSA has included NAICS codes that are very narrow in scope.</p> <p>For the past 15 years or so, this work was typically classified under NAICS codes that were more general in nature (e.g., 541611 Administrative Management and General Management Consulting Services). By including such narrow defined NAICS, the government will run the risk of securing niche companies that do not necessarily provide the depth of capability required to meet the government’s needs but can check the box.</p> <p>These NAICS codes actually limit competition rather than increase it. Further, the government states on page 3 of 144 B.1.1 Office of Personnel Management . . . “In all cases, the project deliverables are customized or designed to meet unique agency specific requirements that cannot be adequately met through the use of off-the-shelf solutions.” Yet, the NAICS code 611699 All Other Miscellaneous Schools and Instruction is typically used to secure off-the-shelf solutions.</p> <p>NAICS codes are archaic and have not been updated and do not reflect the changing marketplace from manufacturing to knowledge-based economies. For example, there is no NAICS for online learning. These services are classified under 541611 Administrative Management and General Management Consulting Services instead of Software Publishing. By definition the contracts have the wrong NAICS.</p> <p>Additionally, NAICS code selection process is subjective and random. Government contracting officers are using NAICS to classify Small Business Set asides, therefore they are selecting NAICS that may not necessarily map to the services being performed. For example, Air Crew training services are being classified under Flight Services, rather than under education and training.</p>	<p>This recommendation was considered but the RFP will not be amended.</p>	<p>NAICS</p>
<p>6. Page 49 of 144 . . . H.4.2 Predominant NAICS Code Determination states that . . . “The OCO must identify the NAICS Code Number, Title, Business Size Standard, and corresponding Pool in the task order solicitation and report the NAICS Code in the Federal Procurement Data System-Next Generation (FPDS-NG) system.”</p> <p>Comments/Suggestions: If the CO is going to determine the appropriate NAICS code for an opportunity under HCaTS, why can’t they also review past performance and contract documentation provided with our proposals to determine NAICS code relevance? If the CO is going to determine NAICS during the operation of HCaTS, why can’t they do it during the proposal review process? Many of our contracts could have been coded differently and probably should have been. Why not let the government review our past projects and rate them accordingly.</p>	<p>The Past Performance Substitute Form will be amended to allow any Federal employee with knowledge of the Offeror's past performance to rate the Offeror's Relevant Experience Project.</p> <p>To ensure equitable treatment for all Offerors, the HCaTS team is requesting that all information be included in the proposal by the time the RFP closes.</p>	<p>NAICS</p>

<p>Comments/Suggestions: As follows are recommendations to allow GSA to ensure they fairly and objectively rate and score past performance and relevant work.</p> <ol style="list-style-type: none"> 1. Remove the use of NAICS codes in the assignment of points for past performance. The primary concern of the government should be on successful performance of relevant work. This can be done by requiring a mapping of the actual work performed to the work required by the HCaTS solicitation. 2. Allow offerors to self-certify their relevant experience projects under one of the NAICS codes listed in L.5.2. In this case, the government could require a brief explanation as to applicability of the selected NAICS code. 3. Allow a letter from a contracting officer that states the applicable NAICS code for a relevant project, without requiring the contracting officer to declare the initial NAICS code to be incorrect. (To offer this option, consider the time the COs will take to provide this letter and also the possibility that they may not be comfortable with this approach) 4. Award substantially more points for the predominant NAICS code in each Pool 	<p>The RFP will be amended removing the additional scores assigned to NAICS Codes; however, Offerors will still need to submit at least four Relevant Experience Projects per Pool that map to a NAICS Code prescribed in the RFP.</p>	<p>NAICS</p>
<p>What happens if the NAICS assigned to a First-Tier subcontract is not the same as the NAICS assigned to the federal prime contract?</p>	<p>The RFP will be amended to allow the Prime Contractor to certify the applicable NAICS Code for the work the First-Tier Subcontractor performed on J.6 Past Performance Substitute Form. The First-Tier Subcontractor's NAICS Code does not have to be the same as the Prime Contractor's NAICS Code. The First-Tier Subcontractor's NAICS Code is determined based on the work that they performed and not the entire scope of the Prime Contractor's Contract.</p>	<p>NAICS</p>
<p>Page 70, Section H.2.3.1, Lateral Pool On-Ramping – It makes sense to require small businesses that will hopefully be growing under the HCaTS vehicle to recertify their size standard. However, what does not make sense is how a small business that is awarded a contract under Pool 1 (training) can be expected to move to Pool 2 (human capital) if their capability and relevant past experience is in training, not human capital? While the size standards are different, the type of work and relevant experience are vastly different. Please clarify how this makes sense. Size standard is based on a 3 year average of revenues. It would not make sense to recertify every year, but perhaps every 2-3 years to make sure the 3 year average is still within the NAICS code size standard</p>	<p>An Offeror need not have performed previous work in every KSA to have been awarded a contract in any Pool. Furthermore, both Pools consist of the same three KSAs and scope (Section C).</p>	<p>On-ramping</p>
<p>L.5.3.4 CPARS sometimes/often include an overarching score. Recommend permitting the use of this score if it is present in place of the averaging method provided in the DRFP.</p>	<p>This recommendation was considered but the RFP will not be amended.</p>	<p>Past Performance</p>
<p>If proposing as a single small business that has existed for around a year, will the government accept personal past performance in lieu of or in addition to corporate?</p>	<p>No.</p>	<p>Past Performance</p>

<p>Will the government accept past performance examples from prime offerors (the offeror putting forward a bid for HCaTS) where services were performed for the Federal Government as a subcontractor?</p>	<p>The HCaTS team will amend the RFP to also allow First-Tier Subcontractors to submit experience earned under a Prime Contractor's contract, task order and/or purchase order. All experience performed as a First-Tier Subcontractor will be considered a non-Federal government project.</p> <p>However, when submitting a proposal as a Joint Venture, all Relevant Experience Projects and associated past performance information shall have been awarded under the existing Joint Venture's DUNS Number and not the individual members making up the Joint Venture.</p>	<p>Past Performance from Subcontractors</p>
<p>Can it be acceptable for Small Businesses to use teammates for Past Performance when the teammate performed the reference as a Prime contractor? That would satisfy the Government's concerns for validity of the Past Performance and allow the Small Business Prime to produce sufficient number of Past Performances to meet HCaTS requirements. That is a win/win scenario for the Government and industry.</p>	<p>No, the only time an Offeror can use a teammate's past performance is under an existing Joint Venture. When submitting a proposal as a Joint Venture, all Relevant Experience Projects and associated past performance information shall have been awarded under the existing Joint Venture's DUNS Number and not the individual members making up the Joint Venture.</p>	<p>Past Performance from Subcontractors</p>
<p>If a company is going to be a Prime Contractor on HCaTs and performed work as a subcontractor on a contract with a Federal government entity, can this work be used as Relevant Experience (i.e. prior subcontractor is now going to submit a bid as a Prime and wants to use work they performed when they were a subcontractor as Relevant Experience)?</p>	<p>The HCaTS team will amend the RFP to also allow First-Tier Subcontractors to submit experience earned under a Prime Contractor's contract, task order and/or purchase order. All experience performed as a First-Tier Subcontractor will be considered a non-Federal government project.</p>	<p>Past Performance from Subcontractors</p>
<p>HCaTS RFI FAQ p.13: We recommend that both prime and subcontractor past performance credentials be considered in the Request For Proposal (RFP). Both the prime and subcontractor can add value to the HCaTS PMO through their respective experience. Attention should not focus on whom among the Prime or Subcontractor has experience to fulfill the requirement, as long as the team as a whole has the functional experience to successfully execute on HCaTS task orders. The prime contractor should bring experience forming a team and managing it effectively while subcontractors bring specialized technical experience that the prime contractor cannot offer by themselves. Small businesses typically have specialized experience and do not possess the wide breadth of experience the HCaTS RFP requires, which is why they team with other businesses to supplement their base of experience. Considering just the past performance credentials of the prime contractor will unnecessarily obscure the fully body work/experience of the combined teams. Recognizing the Subcontractor's credentials as past performance would provide an added level of detail to evaluators as they assess an Offeror's value proposition.</p>	<p>The HCaTS team will amend the RFP to also allow First-Tier Subcontractors to submit experience earned under a Prime Contractor's contract, task order and/or purchase order. All experience performed as a First-Tier Subcontractor will be considered a non-Federal government project.</p>	<p>Past Performance from Subcontractors</p>
<p>In order to increase the quality and quantity small business primes, it would be in the best interest of the government to permit small business primes to submit past performance from their teammates where the teammate performed the past performance as a prime. This would enable small businesses under the \$11M and \$15M size standards to attain the requisite number of past performances and diversity of past performances to meet the myriad of government requirements.</p>	<p>This recommendation was considered but the RFP will not be amended.</p>	<p>Past Performance from Subcontractors</p>

<p>L.5.2 Will the Government consider modifying Section J.10 NAICS Redetermination template to allow contract officers to validate the KSAs without having to change the NAICS code? This approach is consistent with the requirement for non-Federal Government Relevant Experience Projects for which the offeror may self-certify the NAICS code.</p>	<p>This recommendation was considered but the RFP will not be amended.</p>	<p>Pools</p>
<p>RFI Question: OPM's last answer states, "This requirement will apply to all Pools." Can OPM clarify whether "apply to all Pools" means that the statement would apply to both Pools but each Pool separately or if the statement applies to both Pools but across them comprehensively?</p>	<p>We are not sure what question you are referring to. Keep in mind there have been many changes since the RFI.</p>	<p>Pools</p>
<p>H.4.1 Suggest eliminating pools for the unrestricted large business IDIQ and just have one contract, making it less administratively burdensome for Industry to manage</p>	<p>This recommendation was considered but the RFP will not be amended.</p>	<p>Pools</p>
<p>L.2.4 For each pool listing, it states: "Maximum Number of Multiple Awards: 40" Is this 40 for the Unrestricted contract only?</p>	<p>Both contract vehicles, Unrestricted and Small Business, will have 40 contract awards per Pool. This is a total of 160 awards. The Small Business Contract Vehicle is set-aside for small business; therefore, all 80 awards will go to small businesses. Any business size is allowed to apply on the Unrestricted Contract Vehicle; therefore, the 80 awards could be made up of both small and large businesses.</p>	<p>Pools</p>
<p>Align HCaTS awards under one contract. Awarding two separate MA-IDIQ task order contracts will complicate the post-award HCaTS ordering process, increase contracting actions, and artificially limit the ability of the government to issue single task orders for services that span the proposed separate MA-IDIQ task order contracts. We recommend the government structure HCaTS under one contract, with two Pools (1. Training and Learning, and 2. Human Capital). Offerors could receive an award in Pool 1, Pool 2, or both, and only awardees in both Pools would be eligible to bid on requirements that include work from both pools. This is similar to the current OPM TMA Bridge which is structured under one contract, with two Key Service Areas (1. Training and 2. Human Capital). A single contract, with contractors designated as qualified in one or both Pools, will provide agencies the flexibility to issue single task orders to qualified contractors across the human capital and training services life cycle (e.g. from planning, to assessing, to designing, to piloting, to implementing, to testing, to operating, and to oversight). A single contract will also benefit the government and contractors by reducing the number of potentially unnecessary contract actions.</p>	<p>This recommendation was considered but the RFP will not be amended.</p>	<p>Pools</p>
<p>H.4.1 & K.1 Can the Government clarify why there are two pools described in the Unrestricted draft solicitation? Aren't the pools only applicable to SB participation?</p>	<p>If there were just one Pool, less companies would be eligible for award. In addition, the two contract vehicles mirror each other's structure for the customer's ease of use.</p>	<p>Pools</p>
<p>Section K.1 (Page 80) discusses the Pool structure for the HCaTS contract. With regard to Pool 2, the Education Support Services NAICS code is not typically delivered as part of general strategic human capital consulting. Will the government consider removing the NAICS code, as the Pool would still be comprised of 4 appropriate NAISC codes for the size standard and type of services bring provide under Pool?</p>	<p>Based on our market research, this NAICS Code will be used by Ordering Contracting Officers for future task orders.</p>	<p>Pools</p>

<p>(Section M.6.3), p. 140 What happened to Pool 3? It is not mentioned in the draft RFPs.</p>	<p>Pool 3 has been removed from the RFP</p>	<p>Pools</p>
<p>Contract Duplication We are concerned about the award of two separate sets of contracts (for both the Unrestricted and Small Business contracts) corresponding to Pool 1 NAICs and Pool 2 NAICs rather than a single set of integrated contracts covering both Pools. According to our conversations with GSA, the current structure results from an inability of the Federal Government to implement the regulatory and systems changes response to the Small Business Jobs Act of 2010. The unintended consequence is unnecessary, costly contract duplication for small, medium and large business concerns. Here, the HCaTS DRFP contemplates the award of 80 separate contracts covering the two pools (40 awardees for each pool) rather than the award of 40 integrated contracts that include both pools on each awardee's contract. The duplicative contract structure resulting from the HCaTS DRFP will increase government and contractor administration and management costs; costs that will be borne by customer agencies and the American people. The Coalition recommends that the HCaTS DRFP be restructured to provide for the award a single set of integrated contracts covering both pools. In this case, during the initial contract period (the Coalition recommends a five year base), GSA and OPM should assign a single NAICs contract vehicle that best corresponds to the overall work to be performed. For example, the NAICs for the prior TMA contract could be used to ensure continuity of expectations for government and industry. Subsequently, for the option period (the Coalition recommends a five year option period), GSA and OPM assign/list the appropriate NAICs corresponding to the two Pools thereby allowing customer agencies to assign the appropriate NAICs to the work being performed under the task order over the course of the five year option period. This approach will reduce unnecessary, confusing and costly contract duplication. This approach will also increase ease of use and will promote more effective implementation of integrated solutions that meet customer agencies' needs. It will also allow for a sound, phased implementation of the regulations when the upgrades to the Federal Government's reporting systems have been made. Finally, it is consistent with the SBA's comments and observations regarding implementation of 13 3 CFR 121.402 governing the assignment of NAICs to contracts and task orders. At the time of implementation, the SBA noted that it would take several years to accomplish. Specifically SBA stated</p>	<p>We believe that the structure prescribed in the RFP treats all Offerors equitably at the contract and task order level in a clear and consistent manner, allowing the Government to determine the business size at the contract level and task order level while remaining in compliance with the SBA Final Rule, dated October 2, 2013.</p>	<p>Pools</p>
<p>The HCaTS unrestricted contract should eliminate the dual pool structure and simply rely on one pool that combines all the NAICS codes from the two current pools into a single NAICS code (at the \$15 million level).</p>	<p>Everything else being equal, to do this would significantly reduce the ability of "mid-size" companies from obtaining an award. Also, companies with a size standard between \$11 Million and \$15 Million would be both small and large, depending on which NAICS Code was chosen. Therefore, we would have to request a small business plan at the contract level from these companies, only for it to not be applicable for all task orders. Additionally, having the same contract vehicle structure in both HCaTS and HCaTS SB is more customer friendly.</p>	<p>Pools</p>

H.19 Would the Government consider an alternative metric based on the number of proposals submitted over time, for example six submissions prior to Option I? Shouldn't the goal of using this contract be to encourage companies to submit quality proposals over time without potentially reducing the pool of qualified companies?	The RFP will be amended to include language allowing Contractors to substantiate a good faith effort in responding to solicitations solicited under their respective Pool(s).	Post Award
Per Section H.3.1, is there an estimate (or minimum target) of approximately what proportion of task orders is likely to be set aside for the specific socioeconomic groups noted therein (e.g., 8(a), WOSB, etc.)?	No. That decision will be made by each individual Ordering Contracting Officer.	Post Award
Section H.19, HCaTS SB (page 65) states that a minimum of 3 task orders or a value of \$1M is needed for assurance that the contractor can obtain exercise of Option 1. Please justify these numbers given that the length of performance for the base period has not been set. Our view is the numbers are reasonable for a base period of 4 to 5 years but not for a period of less than 4 years.	The RFP will be amended to include language allowing Contractors to substantiate a good faith effort in responding to solicitations solicited under their respective Pool(s).	Post Award
The combined annual value threshold for avoiding off-ramping is biased in favor of larger vendors. Section H.19 states that a contractor "shall attain a minimum of three task order awards or a total task order estimated value of \$1.5M..." prior to the exercise of Option I under their HCaTS contract. We would argue for eliminating this wording, or at the very least reducing the combined threshold (i.e., \$750,000).	The RFP will be amended to include language allowing Contractors to substantiate a good faith effort in responding to solicitations solicited under their respective Pool(s).	Post Award
Section B. 3 No indirect costs are authorized for ancillary costs and ordering agencies may prohibit contractors from recovering the indirect costs of travel and materials. How are contractors to recover indirect costs on time and material task orders?	Contractors are required to propose costs and/or prices in accordance with the task order solicitation. If the Contractor believes that a cost is allowable, it will have to discuss the matter with the Ordering Contracting Officer.	Post Award
E.1. Why will the HCaTS PMO's acceptance of deliverables be required as well as the ordering activity's acceptance?	The HCaTS PMO will only inspect and accept deliverables that are required at the contract level, not the task order level.	Post Award
F.2 Will the HCaTS PMO be able to terminate task orders as well as HCaTS contracts?	No, the decision to terminate a task order is solely made by the Ordering Contracting Officer who awarded it.	Post Award
F.4.1 Will BPAs be permitted on HCaTS?	No, FAR Subpart 16.5 only allows orders to be issued against an IDIQ.	Post Award
F.5.1 Will Service Contracts Reporting (PL 111-117) be required, and if so, at the contract or task order level?	The Draft RFP includes Clause 52.204-15 in Section H.	Post Award
G.3.2.1.1 3. Is the requirement for incentive or award fee data on fixed price contracts included in error?	No, an Ordering Contracting Officer may decide to add these at the task order level.	Post Award
H.15 Meetings states . . . "The HCaTS PMO may require up to four HCaTS Program Management Review (PMR) meetings per year." We suggest GSA clarify whether or not these are IDIQ-level or Project-level meetings	The PMRs are at the IDIQ-level.	Post Award
Section F.5, Performance Standards. This section refers to the Government's ability to inspect the Contractor's HCaTS SB records. Will there be a separate records retention policy designating a specific number of years to archive and store these HCaTS records, or should Contractors simply follow standard Federal guidance regarding Federal contracting records retention?	Contractors should follow standard Federal guidance regarding contract record retention.	Post Award
Section H.24, Dormant Status. Will there be an interim procedure established to allow a Contractor to reverse a finding of Dormant Status without resorting to the Alternative Disputes Resolution (ADR) process? It seems logical to offer Contractors a method to appeal a final finding of Dormant Status before resorting to ADR and Ombudsman involvement.	No	Post Award

Section B.2 (page 6) and Section G.2.4 (page 33) discuss the role of the Ordering Contracting Officer (OCO). Will the HCaTS Contracting Officer provide assisted acquisition for the HCaTS contract?	No	Post Award
Sections B.3.4 and B.3.5 (page 11) reference pricing for travel and materials and equipment, respectively. Does the government intend to allow contractors to charge general and administration (G&A) fees on these items as part of their indirect costs?	If the task order solicitation allows it, yes.	Post Award
Page 65, Section H.19, Minimum Task Order Awards or Est. Value – The government appears to be holding the Contractor responsible for winning a minimum number of awards under the HCaTS vehicle or else be removed from the vehicle. How is it fair to the Contractor to attain a minimum number of awards when the decision to make an award is not their decision? This is a big concern as there has been very little to no task orders released or awarded under the current incumbent OPM-TMA contract vehicle. How is the government going to ensure there is ample business for Contractor's to seek under the HCaTS vehicle to allow them the opportunity to be successful in gaining a minimum number of awards? Wouldn't it be a better incentive to ensure appropriate competition at the task order level and require Contractors to respond to a reasonable minimum number of task orders under the HCaTS vehicle assuming there are task orders released? A minimum number of awards is not a fair measure when the Contractor has no control over award decisions.	The RFP will be amended to include language allowing Contractors to substantiate a good faith effort in responding to solicitations solicited under their respective Pool(s).	Post Award
Are there any OCI considerations between developing software for EPIC 2 and performing the duties of the HCaTS program?	We are unaware of any OCI issues at this time; however, at the task order level Contractors will have to disclose any known OCI issues to the Ordering Contracting Officer for their consideration.	Post Award
What will the process be to respond to solicitations under the HCaTS contract? Will vendors only be able to respond to task orders released within their awarded Pool or will they be eligible to respond in other Pools? Will the process be the same under the HCaTS Unrestricted and HCaTS Small Business contracts?	Based on their market research, Ordering Contracting Officers will choose to solicit under one Pool under either the HCaTS or HCaTS SB contract vehicle. Only those Contractors awarded in the chosen Pool will be permitted to respond to a task order solicitation.	Post Award
Our understanding is that the PPIRS database only holds CPARS for 2-3 years, however, we are asked to provide contracts that have been active within the last 5 years. Can we confirm that we may provide CPARS for projects that are within the 5 year span, but due to restrictions are no longer in the PPIRS Database, for which we have internally kept records.	Yes. The Final RFP will reflect this.	PPIRS
If the offeror has a past performance reference that is documented in CPARS, but not linked to PPIRS, can the offeror submit a copy of the CPARS rating information in place of PPIRS? Would the offeror still be required to submit Attachment J.6?	If the CPARS report is older than 3 years and is no longer available in PPIRS, the CPARS report may be submitted in lieu of the PPIRS report.	PPIRS
If interim ratings are available in CPARS must the offeror still submit the past performance substitute form?	If the PPIRS report is older than 3 years and is no longer archived in PPIRS, the CPARS report may be submitted in lieu of.	PPIRS

<p>L.5.3 VOLUME III (PAST PERFORMANCE FOR RELEVANT EXPERIENCE PROJECTS) For each Relevant Experience Project submitted, Offerors are strongly cautioned that inability of the Government to contact past performance references directly associated to any survey; or, in the case past performance information is not entered into the Past Performance Information Retrieval System (PPIRS) database; or, in the case of Relevant Experience Project(s) without a record of past performance, the Offeror will not be evaluated favorably or unfavorably on past performance. Will OPM TMA incumbents' Past Performances be entered into CPARS?</p>	<p>We recommend you contacting your OPM Contracting Officer to discuss the status of your past performance report.</p>	<p>PPIRS</p>
<p>Section M.6.2. Regarding past performance, the solicitation provides that, “[i]f the combined average is 2.99 or below, the Offeror will fail the Acceptability Review and shall not be considered for award.” How does the Agency square this provision with the statutory requirement that offerors without relevant past performance must be treated neutrally?</p>	<p>An Offeror is permitted to submit a Relevant Experience Project without past performance information and have it count to meet the minimum requirements. If the Offeror submits a Relevant Experience Project without a CPARS or PPIRS Report and the Government finds one, that Relevant Experience Project will be evaluated with the existing CPARS or PPIRS Report. For example, if an Offeror submits a Relevant Experience Project without a PPIRS, and the Government find the current PPIRS Report that reflects an average score that is 2.99 or less, the Relevant Experience Project will not be considered.</p>	<p>PPIRS</p>
<p>Section K.2.3 (d): “The offeror shall post the information in paragraphs (c)(1)(i) through (c)(1)(iv) of this provision in FAPIIS as required through maintaining an active registration in the System for Award Management database via https://www.acquisition.gov (see 52.204-7).” Section G.3.7: “Subject to FAR 52.209-9, the Contractor shall update the information in FAPIIS on a semi- annual basis, throughout the term of HCaTS SB.” - What corrective action can a contractor take if none of its Relevant Experience contract-data appears in FAPIIS, but required SAM and CMR entries have been completed by contractor?</p>	<p>Offerors are encouraged to reach out to a Government Assessing Official to complete the Past Performance Substitute Form. If no CPARS/PPIRS Report or Past Performance Substitute Form is available, a Relevant Experience Project can still be submitted and counted if it meets the minimum requirements.</p>	<p>PPIRS</p>
<p>How will the government resolve discrepancies between PPIRS and FPDS-NG?</p>	<p>The RFP will be amended to reflect the order of precedence for the NAICS Code determination. In this instance, FPDS will hold precedence.</p>	<p>PPIRS</p>
<p>L.5.1.3 Will the Government consider removing the page limit from the Professional Employee Compensation Plan for companies that have current plans approved by the companies’ executive management/boards?</p>	<p>Yes. The RFP will be amended to remove page limitations for the Professional Employee Compensation Plan and Uncompensated Overtime Plan.</p>	<p>Professional Compensation</p>
<p>F.5.1 H.9 and H.10 require vendors to notify the HCaTS PMO within “5 calendar days of substitution” for Professional Employees Compensation and Uncompensated Overtime Policy.” Does this mean within 5 calendar days of adoption of new policies?</p>	<p>Yes.</p>	<p>Professional Compensation</p>

<p>1. Page 117 paragraph 4 states, “Only one Relevant Experience Project shall be submitted and considered per Pool if awarded in accordance with FAR Subpart 6.3, FAR Subsection 8.405-6 or FAR Subparagraph 16.505(b)(2).”</p> <p>My interpretation of this verbiage is that an award of this type negates the requirement for multiple experiences – replacing it with a sole experience. Could you please confirm that this is true? Assuming it is true, how does this impact scoring?</p>	<p>This restriction has been removed.</p>	<p>Relevant Experience Projects</p>
<p>2. Relevant experience / past performance: Must all experience/past performances be that of the prime contractor (company submitting the bid in which they were the prime contractor) or is experience/past performance of team members/subcontractors - provided the experience submitted is one in which the team member/ subcontractor was the prime contractor - acceptable?</p>	<p>The HCaTS team will amend the RFP to also allow First-Tier Subcontractors to submit experience earned under a Prime Contractor's contract, task order and/or purchase order. All experience performed as a First-Tier Subcontractor will be considered a non-Federal government project.</p> <p>However, when submitting a proposal as a Joint Venture, all Relevant Experience Projects and associated past performance information shall have been awarded under the existing Joint Venture's DUNS Number and not the individual members making up the Joint Venture.</p>	<p>Relevant Experience Projects</p>
<p>3. Could you please confirm that for contract awards that have option years, the award of an option year constitutes a separate project?</p>	<p>No, option years do not count as separate projects.</p>	<p>Relevant Experience Projects</p>

<p>REFERENCE: Section M.4.2.1 of the HCaTS Unrestricted DRFP states, “The Offeror’s Relevant Experience Projects will be initially evaluated on a pass/fail basis in regards to meeting the minimum proposal submission requirements in Section L.5.2.” The fourth paragraph of Section L.5.2 states, “A Relevant Experience Project is defined as a single contract; or, a single task order placed under a master Single Award or Multiple Award Indefinite Delivery, Indefinite Quantity (SA/MA IDIQ) task order contract (FAR Subsection 16.501-1); or, single task order placed under a Federal Supply Schedule (FAR Subsection 8.405-2); or, a single task order placed under a master Single Award or Multiple Award Blanket Purchase Agreement (SA/MA BPA) (FAR Subsection 8.405-3 or FAR Subsection 13.303). In order for a single contract and/or task order to be considered as a Relevant Experience Project, the Contractor shall have provided a service(s) in accordance with the terms and conditions of the single contract and/or task order. Single contracts and task orders with no performance of a service(s) shall not be considered. If a single contract has a task order(s) awarded against it, the Offeror shall submit either the single contract or the task order(s) as the Relevant Experience Project, but not both. If the Offeror submits the single contract and the task order(s) awarded against it, the single contract and the task order(s) shall not be considered.”</p> <p>QUESTION: Neither DRFP Sections M.4.2.1 or L.5.2 place any age restriction on an Offeror’s Relevant Experience Projects. Is it the OPM and GSA intent to allow Offeror’s to submit experience projects otherwise meeting all relevancy submission requirements regardless of age?</p>	<p>In accordance with L.5.2 Each Relevant Experience Project shall:</p> <p>2. Have been completed within the past five years prior to the solicitation closing date; or, be ongoing.</p>	<p>Relevant Experience Projects</p>
<p>For businesses under the \$11 million size standard for pool 1, it is unreasonable to expect a contractor of that size to have performed on six relevant PRIME contracts within the past 5 years, and to further expect that four of the six will be under a specific NAICS codes. For training specifically, there are numerous training tasks representing the full lifecycle of Customized Training and Development Services that are integrated within larger programs. By their nature, they may be subcontracted, and may fall under NAICS codes that represent the larger program rather than the training-specific tasks.</p>	<p>Both Federal government and Non-Federal government experience are accepted. Furthermore, an Offeror may submit a Relevant Experience Project that they performed as a First-Tier Subcontractor to the Federal government.</p>	<p>Relevant Experience Projects</p>
<p>By placing such restrictive limitations on the viable past performance that can be used, the government is automatically eliminating numerous highly qualified firms with extensive, highly targeted, relevant experience. For SB pool 1 with a size standard of \$11 million, in order to ensure that the government is given the opportunity to evaluate a larger pool of highly qualified firms, we respectfully request that you consider accepting past performance as a subcontractor to fulfill the past performance requirements.</p>	<p>The HCaTS team will amend the RFP to also allow First-Tier Subcontractors to submit experience earned under a Prime Contractor's contract, task order and/or purchase order. All experience performed as a First-Tier Subcontractor will be considered a non-Federal government project.</p> <p>However, when submitting a proposal as a Joint Venture, all Relevant Experience Projects and associated past performance information shall have been awarded under the existing Joint Venture's DUNS Number and not the individual members making up the Joint Venture.</p>	<p>Relevant Experience Projects</p>

<p>We also respectfully request that you consider accepting a larger percentage of the past performances from alternate NAICS codes, as many of the highly relevant training tasks are classified under unrelated NAICS codes as part of the larger program.</p>	<p>The reason why the Government is requiring Offerors to have at least four Relevant Experience Projects per Pool map to one of the prescribed NAICS Codes is to reduce the probability of Offerors winning awards in both Pools without showing a breadth of experience.</p>	<p>Relevant Experience Projects</p>
<p>When submitting information as a contractor, should we also submit the sub-contracting information if the submitted information based on experience and education and not pass performance?</p>	<p>The scoring elements for the Relevant Experience Projects do not take into account the education or experience level of the Offeror nor their subcontractors. The Offeror will only need to substantiate the scoring elements with supporting contractual and past performance documentation.</p>	<p>Relevant Experience Projects</p>
<p>The government provides the option to include a single contract with task orders awarded against that contract as one Relevant Experience Project so long as the task orders are not also submitted as a Relevant Experience Project. Can the government confirm that Offerors may use the combined awarded task orders under one master contract as one Relevant Experience Project to demonstrate the KSAs, duration, and dollar value so long as the Offeror does not separately submit one of the Task Orders as a separate and distinct Relevant Experience Project?</p>	<p>One Relevant Experience Project may be a collection of six or less task orders awarded under a master contract or BPA. If submitting a "collection of task orders" none of the six task orders shall be submitted and counted as a separate Relevant Experience Project. The RFP will be amended to reflect this.</p>	<p>Relevant Experience Projects</p>
<p>Please confirm that the restriction to submit only one Relevant Experience Project awarded in accordance with FAR Subpart 6.3, FAR subsection 8.405-6, or FAR Subparagraph 16.505(b)(2) only refers to Relevant Experience Projects subject to the FAR.</p>	<p>This restriction has been removed.</p>	<p>Relevant Experience Projects</p>
<p>Please confirm that the Government will accept local government projects as a subcomponent of the U.S. state government category.</p>	<p>Yes, this will be considered a Non-Federal government Relevant Experience Project.</p>	<p>Relevant Experience Projects</p>
<p>Would the government please confirm our understanding of the following when submitting non-federal Relevant Experience Projects:</p> <p>1. Projects using Past Performance Substitute Form with a NAICS code identified: Projects will count towards the minimum NAICS code requirement per Pool and will be eligible to receive additional points if more than one NAICS code is submitted.</p> <p>2. Projects using Self Certification Option: Projects will count towards the minimum NAICS code requirement per Pool but will NOT be eligible to receive additional points if more than one NAICS code is submitted.</p>	<p>1. Yes, Relevant Experience Projects that have their NAICS Code determined by the Past Performance Substitute Form (J.6) as a Pool NAICS Code will count towards the four required projects. The scoring elements attached to Pool NAICS Codes have been removed</p> <p>2. Non-Federal Relevant Experience Projects with a self-certified NAICS Code will also count towards the four required Pool NAICS Code projects. An offeror may only self-certify the NAICS Code when it is a Non-Federal government contract or task order and the Past Performance Substitute Form (J.6) was not submitted.</p>	<p>Relevant Experience Projects</p>
<p>When submitting verifiable contract documentation, can Offerors redact proprietary client and company information so long as the objective evaluation factors are apparent?</p>	<p>Yes</p>	<p>Relevant Experience Projects</p>
<p>Would it be helpful for HCaTS if Offerors are able to demonstrate prior support in foreign countries? If so, we recommend adding the following evaluation criteria, similar to what is used in the Alliant 2 Draft RFP:</p> <p>L.XXXX Do any projects involve work in a Foreign Location? 50 2 50 100</p>	<p>No, the HCaTS PMO has determined that experience in foreign countries does not increase the favorability of an Offeror since the majority of HCaTS work is anticipated to be domestic.</p>	<p>Relevant Experience Projects</p>

<p>Are past performances from the prime contractor of the proposed team, the only contracts that can be referenced in the GSA HCaTS response?</p>	<p>The Government will not accept new teaming arrangements and any proposal submitted under a new teaming arrangement shall be rejected as non-conforming.</p> <p>However, when submitting a proposal under an existing Joint Venture, all Relevant Experience Projects and associated past performance information shall have been awarded under the existing Joint Venture's DUNS Number and not the individual members making up the Joint Venture.</p>	<p>Relevant Experience Projects</p>
<p>Can subcontractor past performances be submitted as one or more of the required references?</p>	<p>The HCaTS team will amend the RFP to also allow First-Tier Subcontractors to submit experience earned under a Prime Contractor's contract, task order and/or purchase order. All experience performed as a First-Tier Subcontractor will be considered a non-Federal government project. There is no limitation on the number of Relevant Experience Projects that may be submitted as a First Tier Subcontractors.</p>	<p>Relevant Experience Projects</p>
<p>Are past performance references submitted by the team (both from the prime and the subcontractor) required to be in the role as prime contractor on the reference contract?</p>	<p>The Government will not accept new teaming arrangements and any proposal submitted under a new teaming arrangement shall be rejected as non-conforming.</p> <p>However, when submitting a proposal under an existing Joint Venture, all Relevant Experience Projects and associated past performance information shall have been awarded under the existing Joint Venture's DUNS Number and not the individual members making up the Joint Venture.</p>	<p>Relevant Experience Projects</p>
<p>The solicitation indicates that each reference shall "have a value of no less than \$50,000." - is this an annual value or over the life of the contract?</p>	<p>The current minimum requirement refers to the total value.</p> <p>We will revisit the minimum requirements of a Relevant Experience Project.</p>	<p>Relevant Experience Projects</p>
<p>REFERENCE: Unrestricted DRFP, Page 115 Section L.5.2, last paragraph on the page OFFEROR COMMENT/QUESTION: The solicitation states, "KSA(s) will be validated by providing enough evidence within a contract or task order document, or other verifiable contractual documents, to substantiate the scope of the project". Is it the Government's intent to have only copies or extracts of contractual documents used for validation and that there is no opportunity to provide written clarification or explanation as would be seen in traditional past performance/experience citations?</p>	<p>The Offeror has the opportunity to explain how their Relevant Experience Project is within scope of the KSA(s) that they are claiming and then direct the Government to the supporting contractual documents for substantiation in the Self-Score Worksheet.</p> <p>If the Government requires clarification in making a determination, it will send out a clarification letter that will allow the Offeror to clarify.</p>	<p>Relevant Experience Projects</p>

<p>REFERENCE: Section M.4.2.1 of the HCaTS Unrestricted DRFP states, "The Offeror's Relevant Experience Projects will be initially evaluated on a pass/fail basis in regards to meeting the minimum proposal submission requirements in Section L.5.2." The fourth paragraph of Section L.5.2 states, "A Relevant Experience Project is defined as a single contract; or, a single task order placed under a master Single Award or Multiple Award Indefinite Delivery, Indefinite Quantity (SA/MA IDIQ) task order contract (FAR Subsection 16.501-1); or, single task order placed under a Federal Supply Schedule (FAR Subsection 8.405-2); or, a single task order placed under a master Single Award or Multiple Award Blanket Purchase Agreement (SA/MA BPA) (FAR Subsection 8.405-3 or FAR Subsection 13.303). In order for a single contract and/or task order to be considered as a Relevant Experience Project, the Contractor shall have provided a service(s) in accordance with the terms and conditions of the single contract and/or task order. Single contracts and task orders with no performance of a service(s) shall not be considered. If a single contract has a task order(s) awarded against it, the Offeror shall submit either the single contract or the task order(s) as the Relevant Experience Project, but not both. If the Offeror submits the single contract and the task order(s) awarded against it, the single contract and the task order(s) shall not be considered."</p> <p>QUESTION: Neither DRFP Sections M.4.2.1 or L.5.2 place any age restriction on an Offeror's Relevant Experience Projects. Is it the OPM and GSA intent to allow Offeror's to submit experience projects otherwise meeting all relevancy submission requirements regardless of age?</p>	<p>The contract or task order must have been performed within 5 years of the solicitation closing, or be ongoing. This is stated in section L.5.2.</p>	<p>Relevant Experience Projects</p>
<p>In response to the Prime Contractor Experience comment posted April 9, 2015: If a company is going to be a Prime Contractor on HCaTs and performed work as a subcontractor on a contract with a Federal government entity, can this work be used as Relevant Experience (i.e. prior subcontractor is now going to submit a bid as a Prime and wants to use work they performed when they were a subcontractor as Relevant Experience)?</p>	<p>The HCaTS team will amend the RFP to also allow First-Tier Subcontractors to submit experience earned under a Prime Contractor's contract, task order and/or purchase order. All experience performed as a First-Tier Subcontractor will be considered a non-Federal government project.</p>	<p>Relevant Experience Projects</p>
<p>Will the government allow submitting relevant experience qualifications from partner organizations to support pool qualification?</p>	<p>The Government will not accept new teaming arrangements and any proposal submitted under a new teaming arrangement shall be rejected as non-conforming.</p> <p>However, when submitting a proposal under an existing Joint Venture, all Relevant Experience Projects and associated past performance information shall have been awarded under the existing Joint Venture's DUNS Number and not the individual members making up the Joint Venture.</p>	<p>Relevant Experience Projects</p>
<p>Can you confirm whether work performed for a Federal Agency under a subcontract with another firm will count as a US Federal Government project?</p>	<p>The HCaTS team will amend the RFP to also allow First-Tier Subcontractors to submit experience earned under a Prime Contractor's contract, task order and/or purchase order. All experience performed as a First-Tier Subcontractor will be considered a non-Federal government project.</p>	<p>Relevant Experience Projects</p>

<p>Please provide specific details of how a bidder can propose past performances completed as a subcontractor</p>	<p>The HCaTS team will amend the RFP to also allow First-Tier Subcontractors to submit experience earned under a Prime Contractor's contract, task order and/or purchase order. All experience performed as a First-Tier Subcontractor will be considered a non-Federal government project.</p> <p>If submitting a project that was performed as a First-Tier Subcontractor, the Offeror will have to submit verifiable documentation that supports their claim (e.g., meeting a specific KSA(s), period of performance, value, etc.). Offerors will have to work with their Prime Contractor(s) to ensure the documents can be released and included in their proposal.</p>	<p>Relevant Experience Projects</p>
<p>When measuring the total duration of a contract, will recompleted contracts for ostensibly the same work count towards the total duration? If the intent of awarding extra points for long term performance of HCaTS relevant work is to reward consistent performance over time, then work performed for the same customer for extended durations (as evidenced by a SOW or other verifiable means) can demonstrate the same qualifications as performance on a single contract. Given that a vendor has no control over whether their customer contracts for one 5-year contract or for five 1-year contracts, would the government consider allowing recompleted contracts to be awarded the same points as contracts with a single term?</p>	<p>No, follow on contracts cannot be combined into one project and submitted as a Relevant Experience Project. However, one Relevant Experience Project may be a collection of six or less task orders awarded under a master contract or BPA. If submitting a "collection of task orders" none of the six task orders shall be submitted and counted as a separate Relevant Experience Project. The RFP will be amended to reflect this.</p>	<p>Relevant Experience Projects</p>
<p>When measuring the total duration of an active contract, will the full period of performance be evaluated or will only the completed portion of the contract be considered.</p>	<p>Only the completed portion will be considered. Therefore, Offerors shall not take credit for any period of performance after the RFP closing date.</p>	<p>Relevant Experience Projects</p>
<p>Would a contract with an entity that receives Federal funding be considered a US Federal Government project/ Federal Customer?</p>	<p>No, an Offeror may only take credit for a Federal government project if it was awarded a contract or task order by a Federal agency.</p>	<p>Relevant Experience Projects</p>
<p>The final CPARS reports for projects often only reference the period of performance being evaluated (e.g. the final year of a multi-year contract) and as such do not reflect the total contract duration or total value. How should offerors reflect the total period of performance for the contract if the dates differ from those on the PPIRS or substitute form?</p>	<p>The Offeror may use either the CPARS Report, PPIRS Report, J.6 Past Performance Substitute Form, FPDS-NG or a contractual document to substantiate the period of the performance. The period of performance shall be on what has already been performed.</p>	<p>Relevant Experience Projects</p>
<p>L.3, L.5.2 : In order to facilitate the evaluation process, recommend permitting the use of excerpts, annotations, headers/footers, call out boxes, and other arrows on verifiable contractual documents. This will enable evaluators to quickly see the relevant information and tie it back to the scoring factors.</p>	<p>The Offeror has the opportunity to explain how their Relevant Experience Project is within scope of the KSA(s) that they are claiming and then direct the Government to the supporting contractual documents for substantiation in the Self-Score Worksheet (Attachments J.5.1 and J.5.2).</p> <p>If the Government requires clarification in making a determination, it will send out a clarification letter that will allow the Offeror to clarify.</p>	<p>Relevant Experience Projects</p>

<p>L.5 Not allowing relevant project experience and past performance achieved as a subcontractor, particularly while delivering services through the previous OPM-TMA contract, will effectively eliminate from HCaTS competition many small businesses with extensive experience providing the very services called for in this procurement. DAI strongly recommends GSA and OPM allow the use of relevant project experience and past performance as a subcontractor for the HCATS SB proposal submission, and use the scoring system to differentiate the relevancy in terms of role, scope, deliverables, results, value, etc.</p>	<p>The HCaTS team will amend the RFP to also allow First-Tier Subcontractors to submit experience earned under a Prime Contractor's contract, task order and/or purchase order. All experience performed as a First-Tier Subcontractor will be considered a non-Federal government project.</p>	<p>Relevant Experience Projects</p>
<p>Section L.5.2, paragraph 3, states, "For an Offeror to be eligible for consideration under a given Pool, the Offeror shall have performed six Relevant Experience Projects." Page 116 of the same Section, paragraph 13, states, "If the Offeror is applying for both Pools, they shall submit a minimum of ten and a maximum of twelve Relevant Experience Projects." Is there a maximum number of Relevant Experience Projects for Offerors only competing for one Pool?</p>	<p>Yes, there is a firm number of six Relevant Experience Projects that need to be submitted per Pool. If submitting for both Pools, there is an allowed overlap of two Relevant Experience Projects that equals to 10 unique Relevant Experience Projects, however, Offerors can submit the full six Relevant Experience Projects if submitting for both Pools to maximize the points.</p>	<p>Relevant Experience Projects</p>
<p>RFI Question: OPM's last answer states, "An Offeror can not submit a subcontractor's past performance projects to meet the pool NAICS requirement. Nor can they be used to meet the minimum number of Relevant Past Performance Projects." Can Offerors include past performance projects for their subcontractors if the Offeror has already met the acceptability requirements with their own capes?</p>	<p>We are not sure what question you are referring to. Keep in mind there have been many changes since the RFI.</p>	<p>Relevant Experience Projects</p>
<p>L.5.2.3.4: Bundling of Task Orders under BPA/IDIQ. Will any bundling of task orders under a single IDIQ or BPA be allowed when determined the project value of relevant experience projects?</p>	<p>One Relevant Experience Project may be a collection of six or less task orders awarded under a master contract or BPA. If submitting a "collection of task orders" none of the six task orders shall be submitted and counted as a separate Relevant Experience Project. The RFP will be amended to reflect this.</p>	<p>Relevant Experience Projects</p>
<p>L.5.2.3.5: Relevant Experience Period of Performance. Many contracting offices we work with issue only 12-month task orders. There are projects we have supported consistently for over a decade, but a new task order is issued annually for the work. Under the current scoring system, substantial benefit in the evaluation process is given to contractors who happen to work with contracting offices who issue multiple year contracts/task orders. We request GSA consider reducing the number of additional points awarded to contractors for multi-year agreements as this can be simply a matter of contracting office preference and not a key differentiator among offerors.</p>	<p>There may be instances when a Relevant Experience Project's duration exceeds 12, 36, or even 61 months; therefore, we want to provide Offerors the opportunity to claim those points if they successfully performed for that duration. Furthermore, there is a trade-off from the Offeror's perspective that each project stands on their own and the Offeror can use them towards the RFP's minimum requirements.</p>	<p>Relevant Experience Projects</p>

<p>L.5.2 para 5: We recommend removing the preference for federal past performance credentials and counting corporate past performance credentials against the requirement for a minimum number of NAICS-aligned credentials within each pool. To address the fact that NAICS codes are not explicitly identified by client organizations for corporate contracts, Offerors could submit an explanation of how a given credential aligns to the NAICS code which it is considered to represent. Additionally, Offerors could be required to format their corporate past performance credentials to align to the format used in the Contractor Performance Assessment Reports System (CPARS), allowing the government to perform a like-to-like comparison across all credentials. Removing the bias against relevant corporate experience will allow for fair consideration of Offerors who may possess institutional knowledge about private sector organizations whose human capital and training effectiveness and efficiency far exceed government norms. By considering corporate and federal experience on equal terms, the HCaTS PMO can select Offerors who can bring public sector experience and private sector innovation to Federal agencies.</p>	<p>This recommendation was considered but the RFP will not be amended.</p>	<p>Relevant Experience Projects</p>
<p>Commercial Past Performance does not equate to innovation and Government Past Performance does not equate to a lack of innovation; if GSA/OPM want to increase innovation potential for HCaTs customers by awarding bonus points then bonus points should be assigned to companies with relevant Industry Awards that tie to the KSAs</p>	<p>This recommendation was considered but the RFP will not be amended.</p>	<p>Relevant Experience Projects</p>
<p>L.5.3.2 Please clarify if an offeror can claim past performance for human capital training modules that were developed for its own internal corporate staff if they satisfy the relevant KSA 1, KSA2 or KSA3 criteria.</p>	<p>No, A Relevant Experience Project shall have been performed for a customer outside the Offeror's corporate structure.</p>	<p>Relevant Experience Projects</p>
<p>Section L.5.2 (page 119) requires that each Relevant Experience Project have a least 6 months of performance. We take pride in being able to complete our work for Federal clients very efficiently, even with relatively large and complex efforts. This is in fact one of our selling points to clients on why they should pick us rather than a larger business. Please do not penalize companies like ours that complete work quickly rather than letting client obstacles or vendor internal bureaucracy extend time frames. We ask you either eliminate or reduce this requirement to something like 3 or 4 months.</p>	<p>We will revisit the minimum requirements of a Relevant Experience Project.</p>	<p>Relevant Experience Projects</p>
<p>J.5.2 The Relevant Experience Project Information outlined in Attachment J.5.2 states only one Relevant Experience Project can be sole source. However, this requirement is not included in the Draft RFP. Could the government clarify if this is a requirement? If this is a requirement, what is the intent of the government to limit Relevant Experience Projects to only one project that was awarded as a sole source? If the intent of the government is to have vendors represent past performance references that are of similar size and scope of HCaTS task orders and to verify quality delivery, then the award type should not be used as a qualifier for past performance references. This limiting factor places businesses that can receive a sole source award (e.g., 8a, SDVOSB, HUBZone) at a disadvantage in the HCaTS evaluation. Many agencies choose to award setaside business with a sole source award due to the ease in which a contract can be awarded (and often times, there is a competition prior to award despite how the contract is awarded)</p>	<p>This restriction will be removed in the RFP.</p>	<p>Relevant Experience Projects</p>

<p>There seems to be some potential ambiguity in section L.5.2, p. 114 about what can be defined as a “project.” This definition seems to imply that a project could be defined as either a single task order performed under a Multiple Award, Indefinite Delivery, Indefinite Quantity contract, or the entire contract could be used as the unit for Relevant Experience Projects (rather than a specific project under the IDIQ). Under the OPM TMA vehicle, a single project may have numerous task orders, and each task order may be small and specific to a unit of work. For example, a project to design, develop, and implement a selection system for an agency may have separate task orders for the management plan, job analysis, test development, implementation, data analysis, and reporting. We would like to see greater clarity in terms of what counts as a project for past performance purposes to ensure that we are allowed to use a project, with multiple task orders, as a Relevant Experience Project.</p>	<p>The RFP will be amended to add additional language clarifying what is a project.</p> <p>One Relevant Experience Project may be a collection of six or less task orders awarded under a master contract or BPA. If submitting a "collection of task orders" none of the six task orders shall be submitted and counted as a separate Relevant Experience Project. The RFP will be amended to reflect this.</p>	<p>Relevant Experience Projects</p>
<p>In addition, the requirement that the project value be expressed as an annual value can water down the evidence that a company can perform a large project within a relatively brief period of time. For example, if a company performs \$800,000 of work for a client agency in the first year and \$50,000 in each of 3 succeeding years on a project, the annual value is only \$237,500 and the scoring does not reflect the fact that the company was able to perform nearly \$1,000,000 of work in a 12-month period. Is the average \$237,500 per year really more valuable than \$1,000,000 of work in a single year? Your scoring implies that it is.</p>	<p>In order to evaluate proposals equitably, we have determined that actual performance is the best methodology.</p>	<p>Relevant Experience Projects</p>
<p>The DRFP provides no incentive for teaming because the past performance of subcontractors is not considered. Given the requirements of the contract vehicle, we would argue that their experience should count – otherwise it is likely we won’t be competitive for this contract vehicle. If subcontractors’ experience does not count, primes have no incentive to include smaller firms on their team that, while not a small businesses, are not large enough to mount a credible HCaTS bid on their own.</p>	<p>The HCaTS team will amend the RFP to also allow First-Tier Subcontractors to submit experience earned under a Prime Contractor's contract, task order and/or purchase order. All experience performed as a First-Tier Subcontractor will be considered a non-Federal government project.</p> <p>A Relevant Experience Project will get points if they had three or more subcontractors/teaming partners on the contract or task order. We have reduced this threshold from the draft RFP from four to three subcontractors/teaming partners based on industry feedback.</p>	<p>Relevant Experience Projects</p>
<p>In section L.5, it states that, “All projects and past performance submitted in response to this solicitation shall have been performed as a Prime Contractor,” and “Any evaluation element under Section L.5, Volume 1 through 5, for which an Offeror was identified as a subcontractor shall be rejected.” Does this quoted information mean that our company may not use past performance for Pool Qualification Projects and Relevant Experience Project(s) if we performed them as a subcontractor via another contractor that was the Prime Contractor even though we performed a majority of the work on the task order? If this is true, this seems to allow Prime Contractors to take credit for work that was primarily done by subcontractors and fail to allow Subcontractors to take credit for the work they actually did. We again believe that the current RFP favors very large businesses and is biased against small and medium-sized businesses.</p>	<p>The HCaTS team will amend the RFP to also allow First-Tier Subcontractors to submit experience earned under a Prime Contractor's contract, task order and/or purchase order. All experience performed as a First-Tier Subcontractor will be considered a non-Federal government project.</p>	<p>Relevant Experience Projects</p>

<p>M.4.3 Is the government's intent to only evaluate past performance from potential HCaTS prime contractors? Meaning, will the government consider past performance from a potential HCaTS sub- contractor, that was performed as a prime?</p>	<p>The HCaTS team will amend the RFP to also allow First-Tier Subcontractors to submit experience earned under a Prime Contractor's contract, task order and/or purchase order. All experience performed as a First-Tier Subcontractor will be considered a non-Federal government project.</p>	<p>Relevant Experience Projects</p>
<p>L.5.2 The OPM TMA contract competed and awarded a top-level task order (0001) to support a client based on proposals received in response to a Request for Task Order Proposal (RFTOP). Subsequent to the top- level task order award, the work was performed by the awardee as TMA projects, each of which could have multiple task orders. For example, some TMA projects had more than 10 associated task orders. These task orders, not the project, are individually recorded in FPDS-NG. To demonstrate the full scope and magnitude of services performed on a single RFTOP task order award, will the government allow an offeror to aggregate associated projects and task orders into a single Relevant Experience Project for evaluation?</p>	<p>One Relevant Experience Project may be a collection of six or less task orders awarded under a master contract or BPA. If submitting a "collection of task orders" none of the six task orders shall be submitted and counted as a separate Relevant Experience Project. The RFP will be amended to reflect this.</p>	<p>Relevant Experience Projects</p>
<p>L.5.2 The OPM TMA bridge contract allowed contractors to continue, and expand, client project work started on the TMA contract. However, the continuation/expanded work is recorded in FPDS-NG under the bridge contract number. Will the government allow an offeror to aggregate associated client projects and task orders from the TMA contract and bridge contract into a single Relevant Experience Project for evaluation?</p>	<p>One Relevant Experience Project may be a collection of six or less task orders awarded under a master contract or BPA. If submitting a "collection of task orders" none of the six task orders shall be submitted and counted as a separate Relevant Experience Project. The RFP will be amended to reflect this.</p>	<p>Relevant Experience Projects</p>
<p>Will the government consider reducing the requirement from 6 to 4 past performances for the Small Businesses set-aside?</p>	<p>This recommendation was considered and the RFP will not be amended.</p>	<p>Relevant Experience Projects</p>
<p>Will the government consider reducing the minimum threshold dollar value for past performances for the Small Business set-aside to 200K annually?</p>	<p>The minimum total value for each Relevant Experience Project is \$50,000.00. We will revisit the minimum requirements of a Relevant Experience Project.</p>	<p>Relevant Experience Projects</p>
<p>Will the government consider allowing more than one sole source past performance reference for the Small Business set-aside?</p>	<p>This restriction will be removed in the RFP.</p>	<p>Relevant Experience Projects</p>
<p>Please reconsider the decision to determine in what KSAs contractors' past performance qualifies on the basis of contract paperwork only. Even if deliverables are included as contract paperwork, this decision unfairly disadvantages contractors whose projects were lightly documented, for whatever reason. a. Furthermore, (see question 22 below), it isn't clear whether the C.O. that determines whether a project represents work in a KSA is the GSA/OPM evaluator or the C.O. that actually oversaw the work being performed. The government official to make this determination should be the COTR on the past performance. Additionally, what level of documentation is necessary to establish the appropriate KSA for a project?</p>	<p>The RFP will be amended allowing Offerors to submit contractual deliverables in addition to contractual documents to substantiate the claim of having performed a KSA(s).</p>	<p>Relevant Experience Projects</p>

<p>L.5.2 Non-FAR-covered agencies have pre-approval/IDIQ type contracts similar to FAR/GSA BPAs. For example, the FDIC issues “BOA” contracts, which are similar to FAR BPAs in that competition is limited to BOA holders and rates are fixed at the contract level. Will task orders under such arrangements be acceptable past performance? If yes, can the RFP be clarified that this is permissible?</p>	<p>A Relevant Experience Project that was awarded by a Federal agency (e.g., The Judiciary Branch), quasi-Federal agency (e.g., Federal Deposit Insurance Corporation (FDIC) and Federal Reserve Bank), or semi-Federal agency (e.g., United States Post Office) that does not award contract and task orders in full accordance with the FAR shall not be considered a Federal government Relevant Experience Project.</p>	<p>Relevant Experience Projects</p>
<p>L.5.1.8 May work under contractor/US government joint venture arrangements be submitted as past performance?</p>	<p>A proposal may be submitted as a Joint Venture, all Relevant Experience Projects and associated past performance information shall have been awarded under the existing Joint Venture's DUNS Number and not the individual members making up the Joint Venture. An Offeror is prohibited from submitting a proposal claiming a contract or task order as experience as either a Prime Contractor or First-Tier Subcontractor if the contract or task order was awarded to the existing Joint Venture that the Offeror was a member of as a Relevant Experience Project.</p>	<p>Relevant Experience Projects</p>
<p>M.7 Pool Past Performance (L.5.3.2.3) and Relevant Experience Projects (L.5.2.3.1 – L.5.3.4), may we add together follow-on contracts to the original contract, assuming that the contracts are for the same tasks for the same customer?</p>	<p>One Relevant Experience Project may be a collection of six or less task orders awarded under a master contract or BPA. If submitting a "collection of task orders" none of the six task orders shall be submitted and counted as a separate Relevant Experience Project. The RFP will be amended to reflect this.</p>	<p>Relevant Experience Projects</p>
<p>L.5.3.2.1, would the Government allow use of subcontractor past performance for Federal contracts that are more than a certain threshold? Perhaps \$500,000?</p>	<p>The HCaTS team will amend the RFP to also allow First-Tier Subcontractors to submit experience earned under a Prime Contractor's contract, task order and/or purchase order. All experience performed as a First-Tier Subcontractor will be considered a non-Federal government project.</p>	<p>Relevant Experience Projects</p>
<p>L.5.3.2.2, M.7 While we agree that length of contract can be an indicator of success, we have a concern regarding how the government will determine length of contract.</p> <p>OPM TMA has been the primary contract for procuring training and human capital solutions over the past 25 years. However, due to recent changes in contract requirements, every project is re-competed every year. Therefore, a successful vendor may have worked on a project for 15 years, yet will only obtain the minimum amount of points due to a contractual technicality. We suggest the government allow vendors to submit previous task order contract documents as proof of length of contract</p>	<p>One Relevant Experience Project may be a collection of six or less task orders awarded under a master contract or BPA. If submitting a "collection of task orders" none of the six task orders shall be submitted and counted as a separate Relevant Experience Project. The RFP will be amended to reflect this.</p>	<p>Relevant Experience Projects</p>
<p>Section L.5.2 (page 114) defines a past experience project as “a single contract; or, a single task order under a master Single Award or Multiple Award, Indefinite Delivery, Indefinite Quantity (SA/MA IDIQ) task order contract...” We request that the HCaTS PMO consider modifying this definition to also include work performed under a single OPM TMA project code or initiative. This will allow bidders to more fully represent the diversity of KSAs, periods of performance, and contract values associated with their relevant experience projects.</p>	<p>One Relevant Experience Project may be a collection of six or less task orders awarded under a master contract or BPA. If submitting a "collection of task orders" none of the six task orders shall be submitted and counted as a separate Relevant Experience Project. The RFP will be amended to reflect this.</p>	<p>Relevant Experience Projects</p>

<p>Section L.5.2 (Page 116) states, "Each Relevant Experience Project shall have at least six months of performance, including options." In addition to having a period of performance that is at least six months long, can GSA please clarify if this also means a project must have started at least six months prior to the due date for proposals? For example, would a 12 month project which began four months prior to the proposal due date qualify as a Relevant Experience Project?</p>	<p>In your example, the Offeror can only take credit for work performed up to and including four months. Therefore, this project would not count. However, we are revisiting the minimum requirements of a Relevant Experience Project.</p>	<p>Relevant Experience Projects</p>
<p>Sections J.5.1 and J.5.2 (Attachments J.5.1. and J.5.2, "Relevant Experience Project" Tabs) includes the project attribute "Competed as Sole Source" and further states that only one sole source project will be allowed. Since the method of competition is beyond the offeror's control and does not impact the type and level of quality of the work performed, we strongly recommend that GSA consider removing this attribute for all relevant experience projects.</p>	<p>This restriction will be removed from the RFP.</p>	<p>Relevant Experience Projects</p>
<p>Page 117, Section L.5.2, Volume II – "For an Offeror to be eligible for consideration under a given Pool, the Offeror shall have performed six Relevant Experience Projects, with four of those Relevant Experience Projects under a NAICS Code that corresponds directly to a NAICS Code in the Pool being applied for." Why is the government making the past performance standard higher than in most federal procurements? It is common to require 3 relevant experience, past performances. For many small businesses, like ours, we have depth of experience, not the breadth. We have about 6-7 ongoing contracts that we've held for six to 15 years. These past performance projects, because of the length of experience performing them, are quite comprehensive and span many key service areas. I find it troubling that the government is focused on a number of past performances, rather than the quality and scope of the relevant experience and past performance and the quality of performance on those contracts. I would urge the government to reconsider requiring 6 past performances to possibly 3. Otherwise, you will knock out of competition exceptionally performing small businesses that can perform work under both Pool 1 and Pool 2? We only have 6-7 past performances in total with a large scope and have capabilities and experience in both Pool 1 and Pool 2 but we'd never be able to meet the current past performance requirement in the Draft RFP.</p>	<p>Call Interested Party</p>	<p>Relevant Experience Projects</p>

<p>Page 121, Section L.5.2.3.1 Relevant Experience Projects for Federal Customers – “For each Relevant Experience Project submitted, the Offeror will receive points if the Relevant Experience Project was performed for a Federal customer. A Relevant Experience Project is only considered Federal if the Offeror was the Prime Contractor.” Why is there a requirement that the small business must be the prime with respect to a relevant experience project? It is very common for a small business to get work via a pass through. One of our largest and long running contracts of 15 years has us serving as the subcontractor doing 100% of the work. We didn’t have access to the contract vehicle when the RFP was released but we are recognized experts in the field of work and were brought on to do 100% of the work. Also, there is a rampant trend in federal contracting to push contracts to the 8(a) program. This past year, we were forced to take only 49% of the work we’d been performing as a prime on for the 6-8 years prior because the acquisitions office put the work into the 8(a) program and we are not an 8(a) despite that we are a woman-owned small business. I respectfully request that the government reconsider the requirement that a small businesses relevant project experience only be as a prime. Again, if this requirement stands, the government will disallow from competition very viable and experienced small businesses with experience in both Pool 1 and 2.</p>	<p>The HCaTS team will amend the RFP to also allow First-Tier Subcontractors to submit experience earned under a Prime Contractor's contract, task order and/or purchase order. All experience performed as a First-Tier Subcontractor will be considered a non-Federal government project.</p>	<p>Relevant Experience Projects</p>
<p>Section L.5.2: “Only one Relevant Experience Project shall be submitted and considered per Pool if awarded in accordance with FAR Subpart 6.3...” - Please confirm that the contractor is only permitted to submit one set-aside award (8a in this case) as a Relevant Experience Project.</p>	<p>This restriction will be removed from the RFP.</p>	<p>Relevant Experience Projects</p>
<p>The government states that it is only accepting Relevant Experience Projects and their respective past performance from Prime Contractors and not Subcontractors. Can you confirm that only Prime Offerors for this GSA HCaTS opportunity can submit a past performance reference and not a subcontractor from the Prime’s team who performed their selected reference in the prime role? Will the government consider allowing subcontractors on the Prime’s team to submit past performance references if the subcontractor performed as the prime for the selected reference?</p> <p>If we cannot use our subcontractor’s past performance with our submission, can we use their credentials to help boost our overall score according to the J.5.1 Self Scoring Sheet? For instance, if one of our subcontractors has an ISO 9001:2008 certification or is CMMI Level 3, can we claim that on the scoring sheet?</p>	<p>The HCaTS team will amend the RFP to also allow First-Tier Subcontractors to submit experience earned under a Prime Contractor's contract, task order and/or purchase order. All experience performed as a First-Tier Subcontractor will be considered a non-Federal government project.</p>	<p>Relevant Experience Projects</p>

<p>Is an IDIQ or BPA with one or more task orders performed under it considered a "single contract" that can be used as a single relevant past performance example? If we can use an entire IDIQ/BPA as a single relevant past performance example, are we allowed to roll up the contract value and period of performance to the IDIQ/BPA level?</p>	<p>Offerors are permitted to submit as a Relevant Experience Project a master contract if work was performed against the contract without any task orders being issued (e.g., letter contracts). If a task order was awarded against the contract, the Offeror can submit either the contract or task order but not both. In other words, if performance under a contract was only performed under a task order, an Offeror cannot submit the contract as a Relevant Experience Project. If a contract never had a task order issued against it but the Offeror performed a service(s), the Offeror can submit the contract as a Relevant Experience Project.</p>	<p>Relevant Experience Projects</p>
<p>Will GSA confirm that we can submit more than one task order under an IDIQ/FSS/BPA as relevant project experience examples?</p>	<p>Yes, multiple task orders can be submitted under one IDIQ/FSS/BPA and count as separate Relevant Experience Projects. Furthermore, one Relevant Experience Project may be a collection of six or less task orders awarded under a master contract or BPA. If submitting a "collection of task orders" none of the six task orders shall be submitted and counted as a separate Relevant Experience Project. The RFP will be amended to reflect this.</p>	<p>Relevant Experience Projects</p>
<p>Will GSA/OPM consider reducing the relevant experience project's period of performance from 6 months to 4 months? Many e-Learning projects have a duration of fewer than 6 months.</p>	<p>Your recommendation will be considered.</p>	<p>Relevant Experience Projects</p>

<p>The terms of the solicitation unfairly limit competition for mid-size companies because FPDS does not accurately report single IDIQ task orders.</p> <p>Many IDIQ contracts split task orders into multiple contract actions when entered into FPDS. For example, an OPM TMA task order may have been awarded as a single task order and then appear as 13 different contract actions in FPDS. On the OASIS contract, this was considered a “collection of task orders,” and companies were limited to one collection of task orders per IDIQ. The impact is that companies using work awarded under an IDIQ could be at a disadvantage depending on how the Agency entered the contract actions. For example:</p> <ul style="list-style-type: none"> • If the language prohibits vendors from submitting more than one collection of FPDS contract actions, then TMA vendors would only be able to use a single TMA task order for past performance. • Bonus points are given if a past performance is “greater than 13 months.” TMA usually enters separate FPDS contract actions for each option years, so these entries would seldom exceed 12 months, causing companies using a TMA task order to lose out on up to 1,800 bonus points. • Up to 2,400 points are given if the annual value of the past performance exceeds \$1M. However, if OPM decided to enter a \$2M task order into FPDS as three FPDS contract actions (which would be very common), then the vendor would lose out on these points even if TMA originally awarded this as a single task order. • Large companies have many, many more contracts to choose from than companies in the \$15M - \$70M range and would not be adversely impacted by the unreliable and arbitrary information in FPDS. <p>Possible mitigation strategies:</p> <ul style="list-style-type: none"> • Permit vendors to submit more than one collection of delivery orders as long as they can provide documentation that the collection of delivery orders represents a single task order award. 	<p>One Relevant Experience Project may be a collection of six or less task orders awarded under a master contract or BPA. If submitting a "collection of task orders" none of the six task orders shall be submitted and counted as a separate Relevant Experience Project. The RFP will be amended to reflect this.</p>	<p>Relevant Experience Projects</p>
<p>Given the broad scope of this contract and the wide variation in task orders issued under the OPM TMA vehicle, would the government consider revising this requirement to read at least ONE task order or a total estimated value of \$25,000?</p>	<p>Q25. For example, would OPM consider awarding extra points for a Masters or PhD in I/O Psyc</p>	<p>Relevant Experience Projects</p>

<p>Example: FPDS-NG documents all contract actions under an individual award. In many cases, both single award and IDIQ contracts are incrementally funded through a series of multiple contract actions. The following is a sample report out of FPDS-NG that shows how a single task order (identified by the Procurement Instrument Identifier - PIID - field) can have multiple contract actions in FPDS-NG:</p> <table border="1"> <thead> <tr> <th>PIID</th> <th>Award/IDV Type</th> <th>Contracting Agency</th> <th>Date Signed</th> <th>Action Obligation (\$)</th> </tr> </thead> <tbody> <tr> <td>0001</td> <td>Delivery Order</td> <td>Agency XYZ</td> <td>20-AUG-2014</td> <td>\$100,000.00</td> </tr> <tr> <td>0001</td> <td>Delivery Order</td> <td>Agency XYZ</td> <td>15-SEPT-2014</td> <td>\$150,000.00</td> </tr> <tr> <td>0001</td> <td>Delivery Order</td> <td>Agency XYZ</td> <td>20-DEC-2014</td> <td>\$250,000.00</td> </tr> <tr> <td colspan="2">Total PIID 0001</td> <td></td> <td></td> <td>\$500,000.00</td> </tr> <tr> <td>0002</td> <td>Delivery Order</td> <td>Agency XYZ</td> <td>03-MAR-2015</td> <td>\$1,234,000.00</td> </tr> <tr> <td>0003</td> <td>Delivery Order</td> <td>Agency XYZ</td> <td>04-MAR-s015</td> <td>\$1,000,000.00</td> </tr> <tr> <td colspan="2">Total ALL</td> <td></td> <td></td> <td>\$2,734,000.00</td> </tr> </tbody> </table> <p>PIID 0001 is a task order and PIID 0002 is a modification of the task order issued under PIID 0001. PIID 0003 is a separate task order unrelated to the first two task orders.</p> <p>In the example above, would the offer be allowed to submit PIID 0001 as a past performance award with a total dollar value of \$500,000.00?</p>	PIID	Award/IDV Type	Contracting Agency	Date Signed	Action Obligation (\$)	0001	Delivery Order	Agency XYZ	20-AUG-2014	\$100,000.00	0001	Delivery Order	Agency XYZ	15-SEPT-2014	\$150,000.00	0001	Delivery Order	Agency XYZ	20-DEC-2014	\$250,000.00	Total PIID 0001				\$500,000.00	0002	Delivery Order	Agency XYZ	03-MAR-2015	\$1,234,000.00	0003	Delivery Order	Agency XYZ	04-MAR-s015	\$1,000,000.00	Total ALL				\$2,734,000.00	<p>One Relevant Experience Project may be a collection of six or less task orders awarded under a master contract or BPA. If submitting a "collection of task orders" none of the six task orders shall be submitted and counted as a separate Relevant Experience Project. The RFP will be amended to reflect this.</p> <p>Since PIID 0001 and 0002 are for the same task order, you can take credit for all amounts associated with this task order. Assuming that each action is a contractual obligation, the total amount would be \$1,734,000.00.</p>	<p>Relevant Experience Projects</p>
PIID	Award/IDV Type	Contracting Agency	Date Signed	Action Obligation (\$)																																						
0001	Delivery Order	Agency XYZ	20-AUG-2014	\$100,000.00																																						
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0003	Delivery Order	Agency XYZ	04-MAR-s015	\$1,000,000.00																																						
Total ALL				\$2,734,000.00																																						
<p>Would the offeror be permitted to submit a collection of task orders (PIID 0001 and 0002) as a past performance award with a total dollar value of \$1,734,000.00 if offeror can demonstrate that an error is made and that they are actually the same task order?</p>	<p>One Relevant Experience Project may be a collection of six or less task orders awarded under a master contract or BPA. If submitting a "collection of task orders" none of the six task orders shall be submitted and counted as a separate Relevant Experience Project. The RFP will be amended to reflect this.</p>	<p>Relevant Experience Projects</p>																																								
<p>If the offeror is permitted to aggregate PIID 0001 and 0002 because they are actually the same project, would the offeror be permitted to submit PIID 0003 as a separate past performance project?</p>	<p>Yes, only if PIID 0003 is a separate and distinct contract or task order and meets the minimum requirements of a Relevant Experience Project.</p>	<p>Relevant Experience Projects</p>																																								
<p>For relevant experience projects without ISR or SSR reports associated with them, will the government allow firms to demonstrate small business participation with invoices against contracts?</p>	<p>No, invoices will not be accepted to substantiate small business participation.</p>	<p>Relevant Experience Projects</p>																																								
<p>Question: Does the government intend to offer the same instructions in terms of being able to respond to any number of KSAs independently or will each vendor have to bid on all 3 KSAs?</p>	<p>The RFP states that each Relevant Experience Project shall be within scope of at least one KSA. Offerors are not required to submit Relevant Experience Projects for more than one KSA. However, those who do will earn additional points.</p>	<p>Relevant Experience Projects</p>																																								
<p>How does this approach impact the number of projects to be submitted by an offeror?</p>	<p>There is no change to the minimum number of Relevant Experience Projects that are to be submitted.</p>	<p>Relevant Experience Projects</p>																																								
<p>Page 140, Section M, the table indicates section L.5.3.2.3 for Pool Past Performance, however, this section is not listed in the narrative. Please clarify.</p>	<p>The RFP will be amended correcting this.</p>	<p>Relevant Past Performance</p>																																								

<p>Is it the Government's intent to limit past performances only to the Prime?</p> <p>Will teammates/subcontractors be allowed to submit their relevant past performances that they have performed as a Prime?</p>	<p>The HCaTS team will amend the RFP to also allow First-Tier Subcontractors to submit experience earned under a Prime Contractor's contract, task order and/or purchase order. All experience performed as a First-Tier Subcontractor will be considered a non-Federal government project.</p> <p>However, when submitting a proposal as a Joint Venture, all Relevant Experience Projects and associated past performance information shall have been awarded under the existing Joint Venture's DUNS Number and not the individual members making up the Joint Venture.</p>	<p>Relevant Past Performance</p>
<p>The suggested past performance period of performance is more in line with IT Programs and not Human Capital Programs. Would the government consider reducing the period of performance requirements to be in line with typical Human Capital Programs? Most Human Capital Programs rarely exceed 36 months and rarely if ever exceed 61 months.</p>	<p>There may be instances when a Relevant Experience Project's duration exceeds 36, or even 61 months; therefore, we want to provide Offerors the opportunity to claim those points if they successfully performed for that duration.</p>	<p>Relevant Past Performance</p>
<p>Section C.3.1.3, paragraph two, describes the scope of services included under KSA 3. Will work related to tool/system design or usability testing be appropriate under KSA 3?</p>	<p>It depends on how the scope of the task order is written. Ordering Contracting Officers have the ability to reach out to the HCaTS PMO for assistance in making with-in scope determinations.</p>	<p>Scope</p>
<p>Section C.3.1.2, paragraph two, describes the scope of services included under KSA 2. Could the government provide more detailed information concerning the types of work that are appropriate for KSA 2? For example, would the following service areas be appropriate for this KSA: recruitment, pre-employment selection, job analysis, competency modeling, job design, performance appraisal, organizational surveys, test development and validation, and exit interviews? Do some of these service areas fall under KSA 3? If so, which ones?</p>	<p>The types of work that were asked about for KSA 2 are within scope. Some examples (but the scope of KSA 2 is not limited to these) of the types of work that are appropriate for KSA 2 are: HR strategy, Organizational and position management [includes job analysis, competency modeling, job design], Staff acquisition [includes recruitment, pre-employment selection, candidate testing and assessment, and hiring], Performance management [includes performance appraisal], Compensation management (excluding payroll), HR Development, Employee relations., Labor relations, Separation management [includes exit interviews].</p> <p>There may be an apparent overlap between some types of work between KSA 2 and 3; the distinction is that KSA 3 should have the objectives/outcomes stated for the effort in terms of organizational performance improvement.</p>	<p>Scope</p>
<p>Section C.3.3, paragraph one, concerns IT and Non-Information Technology Products and Services. Is it required that IT solutions have to meet all federal guidelines such as 508 compliance and federal security requirements, or is this decided on a task-order basis?</p>	<p>The RFP will be amended reflecting that Contractors shall comply with Section 508 unless an exception applies.</p>	<p>Scope</p>

<p>L.5.2 The solicitation states, “KSA(s) will be validated by providing enough evidence within a contract or task order document, or other verifiable contractual documents, to substantiate the scope of the project”. Is it the Government’s intent to have only copies or extracts of contractual documents used for validation and that there is no opportunity to provide written clarification or explanation as would be seen in traditional past performance/experience citations?</p>	<p>The Offeror has the opportunity to explain how their Relevant Experience Project is within scope of the KSA(s) and that it is customizable that they are claiming and then direct the Government to the supporting contractual documents for substantiation in the Self-Score Worksheet (Attachments J.5.1 and J.5.2).</p> <p>If the Government requires clarification in making a determination, it will send out a clarification letter that will allow the Offeror to clarify.</p>	<p>Scope</p>
<p>Recommendation 3: Include Human Capital and Training Subscription Services to provide “Anything-as-a-Service (XaaS),” such as software-as-a-service, platform-as-a-service, infrastructure-as-a-service or other human capital and training subscription-based services as part of HCaTS. The subscription service must be paired with, and used to enable, a service offered by an Offeror in FC1 or FC2; or the subscription supports one or more human capital or training KSAs, or the Federal HR Line of Business enterprise service architecture. This will allow contractors to offer innovative XaaS solutions. The government benefits through avoiding capital expenditures, and by accessing solutions that delivers a best-value impact. Today in the commercial human capital and training space XaaS is how commercial customers are solving their complex human capital needs. The market for subscription services will dramatically increase over time because it represents an easy, cost effective way to procure reoccurring services. Adding XaaS to HCaTS will accommodate rapid innovations in process and technology and make HCaTS more attractive to government buyers, especially shared services providers that want to rapidly scale offerings</p>	<p>The RFP prescribes services that are explicitly out of scope. It is not practical to identify every possible service that can be within scope of HCaTS because of the nature of the acquisition (i.e., HCaTS is a Governmentwide contract solution). However, Ordering Contracting Officers can reach out the HCaTS PMO for within scope determinations.</p>	<p>Scope</p>
<p>Recommendation 4: Add a KSA for Information Technology Support of Human Resource Systems. The RFI included a KSA for IT Support of HR Systems. IT supporting HR systems is an ongoing client need and should be included in HCaTS scope to fully meet agencies’ needs. A challenge on the current TMA IDIQ is that IT and systems supporting human capital and training requirements are not specifically described or called out. This results in a large “greyarea” where agencies, OPM, and contractors are unclear what IT services are in/out of scope. We recommend the government add IT Support of HR Systems as a separate KSA, or include it as part of the current 3 KSA descriptions, to make it clear to all parties what IT is in and out of HCaTS scope.</p>	<p>This recommendation was considered but the RFP will not be amended.</p>	<p>Scope</p>

<p>C.1.1 The RFI included a KSA for IT Support of HR Systems. IT supporting HR systems is an ongoing client need and should be included in HCaTS scope to fully meet agencies' needs. Will the government consider adding this KSA back in? Justification/Reason/Explanation: A challenge on the current TMA IDIQ is that IT and systems supporting human capital and training requirements are not specifically described or called out. This results in a large "grey area" where agencies, OPM, and contractors are unclear as to what IT services are in/out of scope. We strongly recommend the government include IT in either a separate KSA, or include it as part of the current 3 KSA descriptions, to make it clear to all parties what IT is in and out of scope on the HCaTS contract. Specifically, we recommend the inclusion of systems requirements, vendor or technology selection support, cloud services implementation or migration, and technical integration across the multiple HR and Training systems that agencies may have in place.</p>	<p>No. KSAs 4 & 5 were determined to be ancillary services that can be provided under KSAs 1, 2 and/or 3.</p>	<p>Scope</p>
<p>C.3.1.1/2/3 Could the government please elaborate on what is and is not in scope in terms of temporary services and IT products and services? How will the ordering CO define and document ancillary and incidental? "As a part of an integrated and total solution, temporary services as defined by FAR Section 37.112 and information technology products and services are allowable provided they are ancillary and incidental to the in-scope work to be performed" Justification/Reason/Explanation: As previously stated, a current challenge many customers experience on TMA today is the ambiguity and lack of clarity around what IT is in and out of scope. We believe clearly calling out what specifically is in scope and out of scope will help address this challenge.</p>	<p>The RFP prescribes services that are explicitly out of scope. It is not practical to identify every possible service that can be within scope of HCaTS because of the nature of the acquisition (i.e., HCaTS is a Governmentwide contract solution). However, Ordering Contracting Officers can reach out the HCaTS PMO for within scope determinations.</p>	<p>Scope</p>
<p>L.5.2.2 Is the Contracting Officer referred to in this section the GSA/OPM evaluator? In other words, this section provides for the GSA/OPM evaluator to determine when a project represents one or more KSA based on the contract paperwork, not the Contracting Officer for the project that is being offered as evidence of work in a KSA?</p>	<p>The Contracting Officer referred to in L.5.2.2 is the GSA Contracting Officer that will be awarding the contracts under HCaTS. The Offeror will submit their explanation on how a Relevant Experience Project is within scope of the KSA they are claiming credit for and submit supporting documentation that the GSA Contracting Officer will use in making their determination.</p>	<p>Scope</p>
<p>L.5.2.3.2 Please confirm that the "verifiable contract documents" to be submitted in support of a multiple KSA assertion include any document approved by the government under the contract or during acquisition, such as project deliverables and RFPs.</p>	<p>Yes, Offerors are permitted to submit contractual deliverables to substantiate their experience under a KSA(s).</p>	<p>Scope</p>
<p>L.5.3.2.3 Until recently, under the OPM TMA contract, modifications were allowed so the scope of projects kept changing but the SOWs were never updated. Therefore, vendors who performed under the OPM TMA contract may be at a disadvantage if SOWs are the only means of documenting the accomplishment of KSAs. We suggest the government allow the submission of Management Plans, emails, deliverables, etc. in order to substantiate KSA accomplishment.</p>	<p>The RFP will be amended to allow deliverables and all contractual documents to substantiate the scope of a Relevant Experience Project.</p>	<p>Scope</p>

<p>Do Not Allow IT or HR Staff Augmentation Projects to be Used as Relevant Experience. Draft RFP Sections C.3.3 and C.3.4 addressing IT services and temporary support services both note that these are considered “ancillary services” and may be provided only as part of total integrated solution. Thus, such services should be “incidental to the work to be performed.” Consistent with this restriction, GSA should specifically and explicitly prohibit offerors from using past performances whose primary purpose was providing IT services or HR temporary support services. Allowing such projects as relevant experience would be inconsistent with restricting such services to a minor and supporting role in task orders issued under the HCaTS vehicle. Furthermore, allowing IT projects as relevant experience will distort the competitive framework as large IT projects generally have a duration and cost far larger than “pure” human capital or training projects and would unfairly provide a scoring advantage to firms for relevant experience that, in fact, would not be allowed under the contract. Therefore, GSA should require that offeror certifies that each relevant experience included in its proposal involved less than 50% IT and less than 50% temporary HR support services, as measured by funded contract value.</p>	<p>In order for a Relevant Experience Project to be considered, the project has to be customized and within the scope of one of the three KSAs. We will consider amending the RFP to reflect your consideration.</p>	<p>Scope</p>
<p>Page 14, Section C.3.1. and Page 51, Section H.4.1 – It is still unclear how the KSAs relate to the pools. There are three KSAs but only 2 pools. What is tie-in between the KSAs and Pools?</p>	<p>The Pools are a grouping of NAICS Codes of the same size standard so the Government knows the business size of the Offeror. Both Pools are inclusive of Section C and the three KSAs.</p>	<p>Scope</p>
<p>In the Key Services Area (KSA) "developing effective metrics to assess progress in carrying out human capital strategies," are there currently any analytical systems in place or desired technology preferences the government has to carry out this function?</p>	<p>Because this is a Governmentwide acquisition, there may be but we are unaware as to what they are. Those types of requirements will be identified in the task order solicitations.</p>	<p>Scope</p>
<p>Information Technology Under the previous Training Management and Assistance (TMA) contract there was a lack of clarity about whether IT could be purchased as part of a solution under the contract. Under the HCaTS contract moving forward, it is important that both customer agencies and contractors are clear as to what IT is within the scope of HCaTS and what is not. We recommend that GSA make this clarification within the KSA descriptions, and include a definition of IT and the permissible scope in the final solicitation. It would also be helpful to include language that specifically addresses ancillary support as allowable costs that may be included within an individual task order under the HCaTS contract.</p>	<p>IT can be purchased as a total solution so long that it is not the primary purpose. The language in the RFP provides Ordering Contracting Officers with the flexibility to meet their requirements. In addition, Ordering Contracting Officers are encouraged to work with the HCaTS PMO in</p>	<p>Scope</p>
<p>L.5.3.2.3 – Key Service Areas: How will the Government verify if a relevant experience project is within the scope of a stated KSA?</p>	<p>The Offeror will provide the rationale for the Relevant Experience Project both being within scope of the KSA(s) applied for and that it is customizable along with the references for the substantiating documents in the Self Scoring Worksheet (J.5.1 and J.5.2). The Government will substantiate the information provided by Offerors in the contractual documents referred to by the Offeror in the Self Scoring Worksheet. Offerors need to provide enough information so the Government can validate the claim.</p>	<p>Scope</p>

<p>Section C, pg 12: With no requirement for offerors to submit a technical approach, how will the government measure an organization's current ability to support the KSAs according to the principles and objectives identified on pages 12 and 13?</p>	<p>The Offeror will provide the rationale for the Relevant Experience Project both being within scope of the KSA(s) applied for and that it is customizable along with the references for the substantiating documents in the Self Scoring Worksheet (J.5.1 and J.5.2). The Government will substantiate the information provided by Offerors in the contractual documents referred to by the Offeror in the Self Scoring Worksheet. Offerors need to provide enough information so the Government can validate the claim.</p>	<p>Scope</p>
<p>Section C.3.3, pg. 19, paragraph 4: "The OCO shall ensure that the aggregate dollar amount of all ancillary support services and supplies, including IT and non-IT products and services, is less than 50% of the task order's awarded amount or estimated cost. OCOs may establish further restrictions to this threshold; however, are prohibited from exceeding it at any time." . Is software development included in the government's definition of non- IT? Is enterprise system development included in the government's definition of non- IT?</p>	<p>Yes to both scenarios.</p>	<p>Scope</p>
<p>This section of the draft RFP states, "Annual project value for ongoing projects is determined as follows: total estimated value (inclusive of all option periods) divided by the total number of months of performance (inclusive of all option periods) multiplied by 12." Is the same formula applied to determining the number of months in a period of performance? Thus, the number of months in a period of performance for an ongoing project is inclusive of executed months plus the future option periods?</p>	<p>No future months will be counted towards a Relevant Experience Project's period of performance.</p>	<p>Scoring</p>
<p>This section of the draft RFP states that the offeror will receive maximum points if the period of performance meets or exceeds a period of performance is equal to or greater than 61 months, including options. Given that the majority of contracting offices award contracts for a base period with four options, with additional periods awarded for unusual circumstances, can 60 month contracts qualify for maximum points? If not, will the government consider maximum points for contracts over 60 months?</p>	<p>As written, an Offeror will get the maximum amount of points for a Relevant Experience Project that has a total duration equal to or greater than 61 months. We will revisit the allocation of points for each scoring element.</p>	<p>Scoring</p>
<p>There are no scoring points listed with each level of certification (ICCM and CPCM) in the table for L.5.4.14. What are the scoring points associated with each level of certification?</p>	<p>We have removed the Contractor Key Personnel scoring element due to Industry Feedback. The final RFP will only have company-wide accreditations.</p>	<p>Scoring</p>
<p>The points in the table add to 23,800 for pool 1, and 24,000 for pool 2. The final rows in the table show 24,800 total points for Pool 1 and 26,800 total points for Pool 2. Please verify each scoring element and the total points for each pool.</p>	<p>The Final RFP will reflect the correct scoring elements</p>	<p>Scoring</p>
<p>Page 126, Section L.5.3.3 says Relevant Experience Projects will receive additional points if the offeror meets or exceeds its small business contracting goals. Since small businesses must be the prime, won't all such projects automatically qualify? Or, does this section only apply to large businesses?</p>	<p>This scoring element will be removed from HCaTS SB RFP.</p>	<p>Scoring</p>

<p>The solicitation states that "Only in the event PPIRS information is not available will an offeror be allowed to substitute a past performance substitute form in accordance with Section L.5.3.3" - may we please clarify where past performance substitution is addressed in Section L.5.3.3 - Meeting or Exceeding Total Small Business Goals.</p>	<p>Neither the PPIRS nor the Past Performance Substitute Form will be used to substantiate the scoring element; meeting or exceeding total small business goals. The Offeror will submit their eSRS report to demonstrate that they met or exceeded their total small business goals.</p> <p>All citations will be corrected in the RFP.</p>	<p>Scoring</p>
<p>Under the OASIS procurement on which HCaTS is being modeled, the government provided a minimum cut score that Offerors need to obtain to receive a contract award. Will the government provide the cut score for HCaTS prior to submission? Establishing a cut score prior to submission allows potential bidders to evaluate their chances of obtaining an award, reducing the cost to bid for companies who the Government would not consider viable participants in the HCaTS contract. The cut score provides the additional benefit of reducing the number of offers that must be evaluated, speeding up the time to award.</p>	<p>We are not providing a minimum score that an Offeror must achieve to be eligible for award. If an Offeror achieves all of the minimum requirements then they are considered eligible for an award. We cannot determine the score that will lead to an award and therefore providing a minimum score would not lead to a potential Offeror knowing their chances of receiving an award.</p>	<p>Scoring</p>
<p>L.5.2.3.5 Scoring based on the length of a contract is an arbitrary indicator of quality training work since the length is set by the government according to their acquisition strategy. This is particularly true for IDIQ contracts, where duration of the IDIQ may have no relationship to any particular task order duration. Offerors could get duration credit for a single, large value, task order with a short duration by claiming the total IDIQ contract duration. Recommend that duration be removed from the scoring criteria. If the HCaTS team feels scoring should be differentiated based on contract length, we suggest that the maximum duration for additional points is 36 months or more, rather than the current "greater than 61 months." With the Relevant Experience Projects limited to performance within the past 5 years (i.e., 60 months), giving additional credit to project in excess of 61 months does not appear logical.</p>	<p>This recommendation was considered but the RFP will not be amended.</p>	<p>Scoring</p>
<p>L.5.3.3 Many government contracts do not require socioeconomic performance goals. Recommend eliminating or reducing the number of cites (e.g., a maximum of 2 Relevant Experience Projects can claim credit for exceeding goals) that require ISR/SSR/eSRS reports.</p>	<p>This scoring element is not mandatory and an Offeror may claim this for every Relevant Experience Project.</p>	<p>Scoring</p>
<p>L.5.3.3: Meeting or Exceeding Small Business Goals. Please clarify the applicability of section L.5.3.3 to the small business solicitation.</p>	<p>The HCaTS SB contract vehicle will be amended to remove this scoring element.</p>	<p>Scoring</p>
<p>M.7 HCaTS is intended to be a government wide contract. Consequently, it makes sense that offerors with a demonstrated ability to deliver HCaTs services to broader areas of the Federal Government are more likely to be effective contributing members of the the HCaTS program. Therefore, to add a meaningful business development discriminator to the scoring process would GSA consider giving additional points to offerors who can demonstrate that they have provided training services to multiple sets of various Departments? The precedent for this is the OASIS contract where offerors gained more points for demonstrated service to more predetermined segments (Mission Areas) of the Federal Space. See the GSA OASIS solicitation sections L.5.3.3.1 and M.5.1.10 for an effective methodology.</p>	<p>This recommendation was considered but the RFP will not be amended.</p>	<p>Scoring</p>

<p>M.7 HCaTs is a multiple award IDIQ (MA-IDIQ) contract. Consequently, it makes sense that offerors with a demonstrated ability to successfully manage multiple award contracts are more likely to be effective contributing members of the the HCaTS program. Therefore, to add a meaningful operations discriminator to the scoring process would GSA consider giving additional points to offerors who can demonstrate that they have successfully managed MA-IDIQ contracts? The precedent for this is the OASIS contract where offerors gained more points for demonstrated task order awards across multiple MA-IDIQs. See the GSA OASIS solicitation sections L.5.3.3.2 and M.5.1.11 for an effective methodology.</p>	<p>This recommendation was considered but the RFP will not be amended.</p>	<p>Scoring</p>
<p>Do not award bonus points for systems required by CAS covered businesses. You can still collect for informational purposes. Otherwise there is no way for companies who don't currently have systems to receive bonus points.</p>	<p>We will revisit the allocation of points for each scoring element.</p>	<p>Scoring</p>
<p>Work with OPM to carefully identify directly relevant criteria and remove rating elements such as these that don't assess the ability of a firm to provide innovative Human Capital and Training solutions.</p>	<p>We will revisit the allocation of points for each scoring element.</p>	<p>Scoring</p>
<p>Commercial work is viewed as less valuable than work performed for the government. Explanation – many vendors work with similar issues in the private sector and many best practices originate in the private sector. Private sector/ commercial past performance should be evaluated on the merits of the project and the ratings provided by the client and at no penalty or lower scale than work performed for the Federal Government.</p>	<p>We believe that administering a federal project, on the whole, is more difficult than a non-federal project; however, we will revisit the allocation of points for each scoring element.</p>	<p>Scoring</p>
<p>L.5.2.3.4 and L.5.2.3.5 For each of these sections, points are awarded for projects that meet or exceed different tiers as far as either annual value or period of performance is concerned. Are the different periods of performance worth more or less points? (Ex. Is a project that lasted >6 months, but <37 months worth more or less than a project that lasted =or> than 37 months, but < 61 months?). The same question regarding Annual Value.</p>	<p>Section M prescribes additional points for projects with higher values and periods of performance.</p>	<p>Scoring</p>
<p>We do not agree with awarding more points for projects larger in size and scope, or that involve four or more subcontractors. Giving more evaluation points to larger, more complex projects adds bias that favors large companies. If points are awarded to past performance projects, we would prefer to see them awarded for quality-related indicators (i.e., client satisfaction scores in PPIRS above a certain threshold) rather than for indicators that reflect the project's size and scope.</p>	<p>This recommendation was considered but the RFP will not be amended.</p>	<p>Scoring</p>
<p>In section L.5.2.3.3 Relevant Experience Projects with Pool NAICS Codes, the ability to receive additional points that increase with the number of additional validated Pool NAICS Codes is another factor that creates a bias in favor of the largest businesses. There may be excellent small or medium-sized businesses that have focused strength in one or two areas that may be a better value for performing work for an agency than a larger business that has a workforce spread across multiple areas of business.</p>	<p>This scoring element will be removed.</p>	<p>Scoring</p>

<p>The scoring sheet in M.7 clearly favors the largest businesses in giving so many additional points to projects that involve more than one KSA or that have very high annual dollar values. In our view, for the Unrestricted pools, this requirement is biased in favor of very large companies that have a greater capacity to serve as prime contractors on complex, multifaceted projects with scopes that naturally cut across multiple KSAs. As a small, non-profit organization, most if not all of our past performance examples conducted through the current OPM TMA vehicle focus on a single KSA, as defined here, so we would be hard pressed to cite past performance that would allow us to obtain these additional points</p>	<p>We will revisit the allocation of points for each scoring element.</p>	<p>Scoring</p>
<p>In section L.5.2.3.6 (pp. 120-121) you state that you will add points if a Relevant Experience Project involves Subcontracting/Teaming with at least four separate and distinct entities. As we note above, we do not think this should be an evaluation factor because it is biased in favor of large companies, who typically prime the type of large projects that require sizeable contractor teams. As currently worded, does the number four include one's own organization (the prime) or is it one's own organization plus four additional entities? The choice of four entities seems arbitrary.</p>	<p>Based on industry feedback, this scoring element has been reduced to give points for a Relevant Experience Project that has three or more subcontractors/teaming partners. The three or more subcontractors/teaming partners are not inclusive of the Offeror who would have been the Prime subcontractor on this contract or task order.</p>	<p>Scoring</p>
<p>Recommendation 1: Remove NAICS codes from pool qualification requirements, and do not award additional points for NAICS, as the codes are only used for classifying, collecting, analyzing, and publishing statistical data related to the U.S. business economy. The government should evaluate projects based on the relevance of the type and quality of the services provided. Further, using NAICS codes as a pool qualification requirement may restrict highly qualified offerors from bidding or presenting their most relevant projects for evaluation. For example, work performed under the current OPM TMA bridge contract is reported in FPDS under NAICS 511210, which is not associated with either HCaTS pool. Eliminating NAICS codes for pool qualification and evaluation will allow offerors to submit their most relevant projects and for evaluation by the government.</p>	<p>This scoring element will be removed from the RFP.</p>	<p>Scoring</p>
<p>L.5.2 Based on the Relevant Experience Projects requested, nowhere does an offeror demonstrate experience managing large MAC/IDIQs of this nature. Will the government consider adding "Relevant Experience (Secondary) Projects with Multiple Award Contracts/BPAs and Task Orders" so an offeror will receive additional points for Multiple Award Contracts/BPAs and corresponding task orders of the HCaTS nature. Justification/Reason/Explanation: By doing this the government will know that an offeror has the experience to manage and promote a contract of this nature that will be used across all Federal government agencies</p>	<p>This recommendation was considered but the RFP will not be amended.</p>	<p>Scoring</p>
<p>Section L.5.2.3.6 Relevant Experience Project with Subcontracting/Teaming – Would the government consider reducing the number of separate and distinct entities required to receive points for relevant experience? OR would the government consider removing this section?</p>	<p>Based on industry feedback, this scoring element has been reduced to give points for a Relevant Experience Project that has three or more subcontractors/teaming partners.</p>	<p>Scoring</p>

<p>On page 144, section L.5.2.3.1, would the Government consider providing points for: “project was performed for a Federal customer” and separate/additional points for “The Offeror was the Prime Contractor.”</p>	<p>The HCaTS team will amend the RFP to also allow First-Tier Subcontractors to submit experience earned under a Prime Contractor's contract, task order and/or purchase order. All experience performed as a First-Tier Subcontractor will be considered a non-Federal government project.</p> <p>Additional points will be earned for projects performed as a Prime Contractor under a Federal government contract and/or task order. Furthermore, additional points will be earned for projects performed as a First-Tier Subcontractor for a Prime Contractor's Federal government contract and/or task order, albeit less than the points allocated for Prime Contractor's experience under a Federal government contract and/or task order.</p>	<p>Scoring</p>
<p>On page 144, section L.5.3.2.1, Line 1 – is it the Government's intent to provide points if the total value of the project is greater than \$250,000; and then additional points for the respective annual values listed under Line 1?</p>	<p>No, the Offeror may only receive points at one tier level per scoring element. The Relevant Experience Project will get the points based on the highest tier level that their annual value hits.</p>	<p>Scoring</p>
<p>Regarding L.5.3.4 in the self-scoring worksheet that pertains to small business participation goals, will the government consider eliminating this as part of the scoring criteria?</p>	<p>We believe that the question is referring to the scoring element for meeting or exceeding subcontracting goals on the Small Business Contract Vehicle. This scoring element will be removed from the HCaTS SB RFP.</p>	<p>Scoring</p>
<p>Regarding L.5.2.3.6 in the self-scoring worksheet, will the government consider decreasing the number of subcontracting or teaming arrangements for small business primes from 4 separate distinct entities, to 2 separate and distinct entities?</p>	<p>Based on industry feedback, this scoring element has been reduced to give points for a Relevant Experience Project that has three or more subcontractors/teaming partners.</p>	<p>Scoring</p>

<p>Recommendation 2: Add Management of IDIQs as an Evaluation Factor</p> <p>Measuring a company’s ability to manage IDIQ contracts and win task orders reduces the risk of awarding to a company that may be poorly qualified to administer a large IDIQ contract and drive new work to it. It would also provide additional differentiation by evaluating the experience and performance a company has in managing IDIQ contracts, in addition to just executing task orders. Managing an IDIQ requires different capabilities than those associated with managing a single contract and GSA schedules, which are sometimes equated to an IDIQ contract given the fact that multiple task orders can be awarded on a schedule. However, the execution and the management of a GSA schedule is not the same as that of a large IDIQ contract such as HCaTS. We are not recommending that IDIQ experience replace past performance experience; rather, we believe an additional scoring factor associated with the management of IDIQ contracts would provide an important and reliable predictor of future quality performance. We also believe it is an equally objective yet much more effective discriminator for IDIQ management than counting the number of certifications that Key Personnel hold.</p> <p>By GSA’s own account, there are more than 1,600 IDIQs across the Government. For this factor, we do not believe the scope of an IDIQ changes the ability of offerors to manage the IDIQ. Therefore, we recommend that GSA and OPM add an evaluation factor that is based on the experience and success a prime contract holder has demonstrated on IDIQ contracts. As was done on OASIS, additional points could be given based on the number of IDIQs a company holds and the number of Task Orders performed. We recommend that a scoring model similar to OASIS be used. Below is the OASIS scoring model used to evaluate a company’s ability not only to successfully manage IDIQs, but to drive work to IDIQ contracts – which is a key element of making an IDIQ successful.</p> <p>Within Last 5 Years:</p> <ul style="list-style-type: none"> • Prime holder of 2 IDIQs with at least 10 total task orders and at least 3 task orders on each —50 points • Prime holder of 5 IDIQs with at least 25 total task orders and at least 3 task 	<p>This recommendation was considered and the RFP will not be amended.</p>	<p>Scoring</p>
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<p>Recommendation 3: Adjust the Scoring Criteria and Point Values for the Length of Task Order/Contracts</p> <p>Points are allocated for the length of a task order. For nearly all Government single award contracts and task orders for services, the maximum period of performance is five years. In addition, most contracts involving training or human capital type services typically last no longer than three years. The current proposed scoring is:</p> <ul style="list-style-type: none"> • 13 months but less than 37 months– 100 points • 37 months but less than 61 months -200 points • 61 months or greater - 300 points <p>We suggest that the scoring criteria and point value be adjusted to:</p> <ul style="list-style-type: none"> • 13 months but less than 15 months – 50 points • 15 months but less than 25 months – 100 points • 25 months but less than 37 months – 150 • 37 months or greater – 200 points <p>We recommend adjusting this scoring methodology for two reasons. First the period of performance is not a true measure or discriminator for the complexity of, or the impact and value that task order has on the client’s mission. For example, providing half a dozen full time instructors for a five year period, we believe, does not deserve significantly more points for a project that involves a two year highly complex reorganizational design and implementation.</p> <p>Second, due to the nature of this work, the current fidelity regarding the period of performance (number of months) does not allow for real discrimination. We believe the majority of all projects will fall within 13-37 months. Under the current scoring methodology a project will usually obtain 100 points, with a few receiving 200 points. Thus, there will be very little differentiation for this evaluation factor among the bidders.</p>	<p>We will revisit the allocation of points for each scoring element.</p>	<p>Scoring</p>
<p>Please reconsider the decision to award more points for contracts with higher dollar value. Higher dollar value is not indicative of quality performance, nor is it clear, from GSA’s statements to industry, that the HCaTS vehicle will be reserved only for contracts of higher value.</p>	<p>We will revisit the allocation of points for each scoring element.</p>	<p>Scoring</p>
<p>Please reconsider the decision to award more points for contracts of longer duration. Length of contract is not indicative of quality performance, nor is it clear, from GSA’s statements to industry, that the HCaTS vehicle will be reserved only for long contracts.</p>	<p>We will revisit the allocation of points for each scoring element.</p>	<p>Scoring</p>
<p>Please reconsider the decision to award offerors points for small business subcontracting only for having achieved goals on a small business plan. We feel this unfairly discriminates against companies that have not been required to file a small business plan, having been small on all contracts until recently. Companies should be allowed to show a commitment to small business contracting in other ways, such as FFATA documentation of actual awards to small businesses.</p>	<p>We will revisit the allocation of points for each scoring element.</p>	<p>Scoring</p>

<p>Please reconsider the decision to award extra points for estimating systems, purchasing systems, and forward pricing rates approved by the appropriate government agency. This unfairly discriminates against contractors that have not met regulatory thresholds or been awarded contracts of types that allowed for such government reviews.</p>	<p>We will revisit the allocation of points for each scoring element.</p>	<p>Scoring</p>
<p>The RFP indicates that “if the error rates exceeds 10% the Offeror shall be excluded from further consideration for award.” Given the potential for a disconnect on KSAs applicable to projects, will the Agency consider abandoning this provision? It creates the risk of an arbitrary elimination from the competition based upon a good faith difference of opinion.</p>	<p>This exclusion has been removed. The Government may ask clarifying questions based on the initial proposal submitted to further our understanding of a specific element. However, Offerors will not be permitted to revise their proposals.</p>	<p>Scoring</p>
<p>Will the Government add an evaluation factor in M.7 for assessing what the Government defines as success at the IDIQ level for vendor provided customized training and development services, human capital strategy services, and organizational performance improvement services (i.e., successfully managing high volumes of several relevant contracts) and make appropriate reductions to the point values for evaluation criteria having less relevance to success?</p>	<p>This recommendation was considered and the RFP will not be amended.</p>	<p>Scoring</p>
<p><i>M.7; B.1.1 [5 U.S.C. 1304 (e)(1)]; B.1.2; B.1.3 Discussion. In the December 22, 2014, “HCaTs Update” posted on GSA Interact Blog, GSA stated that, “...the HCaTS program is the cornerstone of the new Human Capital category, part of OFPP’s Category Management initiative...we are working to develop the HCaTS contract solution, enabling Federal agencies to acquire complex and tailored human capital, workforce support, and other training solutions within the context of the Human Capital Assessment and Accountability Framework (HCAAF).” If it is the Government’s intention to identify a small number of prime contractors that will be responsible for assisting all Federal agencies in carrying out the tasks required under the HCAAF, then it would seem logical that these prime contractors demonstrate a specialization in and corporate commitment to HR/HCM professional services. Suggestion. Create one or more new scoring elements that measure the level of corporate commitment potential prime contractors have to the HR/HCM professional service offerings intended to be combined under the HCaTS Category Management Hallway. There are several ways of doing this including considering the percentage of corporate revenue that comes from Government or commercial HR/HCM contracts. OPM/GSA could also consider the total revenue amount, number of Federal customers, and/or total number of awards received in this area over the past 5 years. All of these potential measures reflect not just the corporate commitment, ut the level of specialization in HR/HCM professional services.</i></p>	<p>This recommendation was considered and the RFP will not be amended.</p>	<p>Scoring</p>
<p>L.5.3.2.1, M.7 The words “on an annual basis” are limiting and seem contrary to what OPM would want. For example, a 12-month, \$1M project will score 400 points whereas a 13-month, \$1M project will only 200 points.</p> <p>The emphasis of awarding points in this section should be on size alone and not combined with length of contract. We suggest the government remove the words “on an annual basis” from this section.</p>	<p>In order to evaluate proposals equitably, we have determined that actual performance is the best methodology.</p>	<p>Scoring</p>

<p>L.5.3.2.1, M.7 Training and human capital projects, unlike IT projects, tend to be shorter in duration and smaller in scope.</p> <p>While we agree that size of project can be an indicator of capability, the majority of training and human capital projects are under \$250,000. First, we suggest, as mentioned above, the government remove the words “on an annual basis” from this section. Second, we suggest the government lower the dollar threshold for the assignment of points to accurately reflect the nature of this work. Points should only be given for projects greater than \$250,000.</p>	<p>In order to evaluate proposals equitably, we have determined that actual performance is the best methodology.</p> <p>We will revisit the current Relevant Experience Project minimum requirements.</p>	<p>Scoring</p>
<p>L.5.3.2.5, M.7 We are not sure how this section benefits the government. It seems to reward companies who can’t do the work themselves and have to subcontract to more qualified companies. Awarding up to 1200 for subcontracting out the work seems excessive and contrary to what the government would want. We suggest the government remove the points associated with this item.</p>	<p>We will revisit the allocation of points for each scoring element.</p>	<p>Scoring</p>
<p>L.5.3.4 Most, if not all of the projects we will be submitting as past performance, had small business goals at the contract or IDIQ level, not at the project level.</p> <p>Therefore, assigning evaluation points for meeting project-level small goals is unfair. We suggest the government remove the points associated with this item or allow vendors to submit documentation of contract or IDIQ level small business goal achievement.</p>	<p>We will revisit the allocation of points for each scoring element.</p>	<p>Scoring</p>
<p>Section L.5.2.3.6 (Page 121) states that offerors will receive additional points for each Relevant Experience Project submitted that “involves Subcontracting/Teaming for services with at least four separate and distinct entities.” While management of multiple subcontractors may be viewed as an element of project complexity, this metric rewards firms for subcontracting significant portions of work due to a lack of breadth and depth of human capital and training experience. Will GSA consider revising this section to provide additional points for Relevant Experience involving “Subcontracting/Teaming for services with at least one separate and distinct entity?”</p>	<p>Based on industry feedback, this scoring element has been reduced to give points for a Relevant Experience Project that has three or more subcontractors/teaming partners.</p>	<p>Scoring</p>
<p>Section L.5.1.6 (Page 104) stresses the Government’s commitment to small business contracting and a desire for large-business Contractors to creatively involve small businesses during performance of the HCaTS contract. Given this focus, would the Government consider the establishment of small business teaming partners as a scoring component of the solicitation evaluations. Specifically, would the government consider adding an additional scoring element including specific additional points that can be awarded for establishing teaming arrangements with small businesses across various small business designations (e.g., HUBZone, WOSB, VOSB, SDVOSB, etc.)?</p>	<p>The RFP currently allows for Offerors to claim for additional points Relevant Experience Projects for teaming/subcontracting.</p>	<p>Scoring</p>
<p>Page 122 and 123, Sections L.5.2.3.4 and L.5.2.3.5 – What is the objective in assigning points for the dollar value and length of term of a Contractor’s relevant project experience? Wouldn’t a contractor’s performance on a contract be more important?</p>	<p>Yes, both experience and past performance are more important than dollar value and length. We will revisit the allocation of points for each scoring element.</p>	<p>Scoring</p>

<p>Subcontracting—The DRFP awards points for past performance involving subcontracting/teaming with four or more separate or distinct entities. The evaluation of demonstrated experience managing 4 subcontractors puts those companies that can offer 7 agencies a total solution at a disadvantage. For HCaTS type work, it is unclear why the ability to manage multiple subcontractors would be preferable to the ability to offer a total solution. Therefore we suggest that this criteria be removed.</p>	<p>As all other than small business concerns will be required to have an approved subcontracting plan in order to receive a contract award, we want to recognize those Offerors who have successfully done so in the past. In addition, we anticipate Offerors having to form teaming arrangements at the task order level and want to recognize those Offerors who have successfully done so in the past. However, we have lowered the number from four to three.</p>	<p>Scoring</p>
<p>L.5.3.4 – Small Business Goals: This section indicates that additional points will be given if a project exceeds small business goals. For task orders issued under an IDIQ contract, small business goals are set at the IDIQ level and not the task order level. When citing a task order award, are small business goals considered to be met if the offeror has met the small business goals of the IDIQ?</p>	<p>Yes, as per the RFP "If a subcontracting plan does not exist for an individual Relevant Experience Project, the ISR or SF 294 report associated to the Relevant Experience Project under a subcontracting plan at the master contract level shall be submitted."</p>	<p>Scoring</p>
<p>L.5.3.2.2 – Period of Performance: This section indicates that additional points will be given based on the period of performance for relevant experience projects. Do the terms of 13, 37 and 61 months include phase-in period?</p>	<p>The period of performance for each Relevant Experience Project shall commence from the effective date of the contract or task order. In the event that you performed work prior to the official effective date, you cannot take credit for this work.</p>	<p>Scoring</p>
<p>L.5.3.2.2 – Period of Performance: This section indicates that additional points will be given based on the period of performance for relevant experience projects. The ranges for point values are measured in months. When converted to years, it appears that the thresholds are whole years plus one month. Is it the intent of the government that the period of performance include a phase-in period?</p>	<p>The period of performance for each Relevant Experience Project shall commence from the effective date of the contract or task order. In the event that you performed work prior to the official effective date, you cannot take credit for this work.</p>	<p>Scoring</p>
<p>Comment: With the continued importance of fiscal responsibility and the pressure to do more with less, cost competition on task orders is a key element in the success of multiple award IDIQ contract vehicles.</p> <p>Recommendation: The Government may consider the addition of a scoring element for offerors' proven success on IDIQ contracts of similar scope. Possible elements might include IDIQ response rates and awards over the previous five (5) years.</p>	<p>This recommendation was considered and the RFP will not be amended.</p>	<p>Scoring</p>
<p>Comment: In section B.2.3 – Cost Reimbursement Task Orders, the draft RFP states that cost reimbursement task orders will only be used of non-commercial items. Additionally, based on historical experience working on multiple award IDIQ contracts, it is highly unusual for task orders to be cost reimbursement type contract.</p> <p>Recommendation: Because the majority of task order awards are likely to be firm fixed price, we recommend removing the scoring element for cost-type contracts and/or replacing it with a scoring element for fixed-price type experience, as that more accurately represents the likelihood of prime contractor success on HCaTS.</p>	<p>This recommendation was considered and the RFP will not be amended.</p>	<p>Scoring</p>
<p>Page 122 of the RFP: L.5.3.3 Meeting or Exceeding Total Small Business Goals / Will the government remove this instruction as under the SB set aside RFP?</p>	<p>The HCaTS SB contract vehicle will be amended to remove this scoring element.</p>	<p>Scoring</p>

<p>Page 123 of the RFP: L.5.3.2.6 Relevant Experience with Subcontracting/Teaming “For each Relevant Experience Project submitted, the Offeror will receive points if the Relevant Experience Project involves Subcontracting/ Teaming for services with at least four separate and distinct entities.” Would the government consider reducing the number of subcontractors on each relevant experience project from four to two as this would show that the prime can manage subcontractors, but still has the capability to perform the majority of the work?</p>	<p>Based on industry feedback, this scoring element has been reduced to give points for a Relevant Experience Project that has three or more subcontractors/teaming partners.</p>	<p>Scoring</p>
<p>Would the government consider awarding points to Offerors who have won and have experience managing a competitively awarded MAIDIQ?</p>	<p>Your recommendation was considered but the RFP will not be amended.</p>	<p>Scoring</p>
<p>The solicitation favors large firms with complex back office systems over firms that demonstrate HC expertise. The solicitation limits the opportunity for the government to access innovative, cost-competitive solutions because it discriminates against mid-size companies in the \$15M - \$70M range, especially as regards accreditation for systems with DCAA audits, as well as CMMI and ISSO compliance. Mid-size companies have significant expertise as demonstrated by their success on the TMA vehicle, but lack the complex back office systems of the very large firms. An example of the big firm advantage is the requirement for DCAA audited systems, which are triggered by both the type (Cost Plus) and the size of the contract awards (Purchasing and Estimating systems must audited at \$50M award level per D-FAR, although can be audited at any size). Examples of how the solicitation benefits very large companies over mid-size companies with HC expertise:</p> <ul style="list-style-type: none"> • Companies receive four times as many points for CMMI/ISO9001 certifications (600 points) as they do for having staff with Human Resources Certifications (max 150 points) • 1,500 combined points for having DCMA audited systems & an EVMS • 1,800 points are automatic for large firms and mid-size firms may not be able to meet contract size bonus levels: 600 points max value for 6 projects under \$500K, 2,400 points max value for 6 projects over \$1M. • Some of the systems and certifications required by Draft Section L may not be necessary or relevant for the predominance of the work that will be performed under HCaTS. For example, it is rare that an Estimating System, Purchasing System, or Earned Value Management System would be needed under HCaTS or even be relevant to it. • GSA has not released the Industry Day list for HCaTS, but assuming it is similar to OPM CHRS, 78% of the 259 contractors at the CHRS Industry Day do not appear on the DCAA Active Contractor list. Given the high number of points allocated to DCAA audited vendors (1500), this gives a significant advantage to a small number of companies who happen to have large DoD cost-plus contracts. • By awarding such a large number of bonus points for DCAA audited systems (more than a company could receive for additional KPIs), HCaTS clearly provides an 	<p>HCaTS Team will revisit the allocation of points for each scoring element.</p>	<p>Scoring</p>

<p>Section L.5.3.3.3, pg. 122 and Section L.5.3.4, pg. 141. There are 600 points for meeting total small business subcontracting goals. For any relevant experience project that does not have an ISR or SSR, meeting or exceeding small business goals shall not be considered.</p> <p>Some contracts do not require specific goals (including the previous TMA contract, which didn't have small business requirements for our firm, which is classified as large on the vehicle), so companies could end up being scored zero for this even if they subcontracted significant work to small businesses.</p> <p>For relevant experience projects that do not have small business goals, will the government accept small business goals at a corporate level based on approved GSA schedule small business plans as a proxy for contract-specific small business goals?</p>	<p>In order to validate an Offeror's claim that they met the subcontracting goals for a previously approved subcontracting plan, we will only accept an ISR or SSR for that Relevant Experience Project.</p> <p>However, an Offeror can substantiate their claim that they have teamed or subcontracted with at least three other entities with invoices, assuming that we can validate the relationship with the Offeror and the entities for that specific project can receive points under that scoring element.</p> <p>HCaTS team will revisit the allocation of points for each scoring element.</p>	<p>Scoring</p>
<p>Why are points awarded if the relevant experience project is inclusive of cost reimbursement (but not T&M)?</p>	<p>Time-and-Materials contracts do not have the same requirements and require the same level of oversight that cost reimbursement contracts require on the part of the Contractor.</p>	<p>Scoring</p>
<p>Since past performance and relevant experience seem to be the most important factors for HCATS, is it possible that it can carry more weight/points to the overall scoring system? The current portion of total points for this category is about 30% of the total possible points. We recommend it be much higher and at least 50%, because this is the most important factor for end users and for success under HCATS</p>	<p>The HCaTS team will revisit the allocation of points for each scoring element.</p>	<p>Scoring</p>
<p>Offerors should be evaluated on their ability to build strong teams of companies--regardless of the size status of individual team members--that can deliver the desired capabilities. As such, GSA and OPM should refrain from giving extra evaluation points based on the number of small businesses included in the offer and their socioeconomic status. It is counterintuitive that under the HCaTS Draft RFP a prime contractor that builds a strong team comprised of the best mid-tier and small businesses may receive fewer evaluation points than a prime contractor that only includes small businesses on their team.</p>	<p>The RFP currently allocates points for Offerors that have performed projects with other teammates.</p> <p>Based on industry feedback, this scoring element has been reduced to give points for a Relevant Experience Project that has three or more subcontractors/teaming partners. The three or more subcontractors/teaming partners are not inclusive of the Offeror who would have been the Prime subcontractor on this contract or task order.</p>	<p>Scoring</p>
<p>L.5.2.3.6 Due to the nature of the work that will be performed on HCaTS and the elimination of Pool 3, we recommend that the government lower the threshold for receiving additional points for teaming/subcontracting from four (4) separate and distinct entities to two (2), as two entities is a more representative and realistic estimation of the prime/subcontractor relationships for the size, scope and complexity of Human Capital and Training contracts.</p>	<p>Based on industry feedback, this scoring element has been reduced to give points for a Relevant Experience Project that has three or more subcontractors/teaming partners. The three or more subcontractors/teaming partners are not inclusive of the Offeror who would have been the Prime subcontractor on this contract or task order.</p>	<p>Scoring</p>

<p>We recommend reducing the weight of this evaluation criteria to 25 points each as follows:</p> <table border="1"> <thead> <tr> <th>Section</th> <th>Element</th> <th>Point Value</th> <th>Number of Potential Occurrences</th> </tr> </thead> <tbody> <tr> <td colspan="2">Total Max Points Per Element</td> <td>Total Max Possible Points</td> <td></td> </tr> <tr> <td>L.5.3.2.6</td> <td>The project is inclusive of Cost-Reimbursement.</td> <td>25</td> <td>2 50</td> </tr> </tbody> </table> <p>50</p> <p>Most vehicles that specialize in Human Capital and Training services, such as OPM TMA and other GSA schedules, do not provide for cost-reimbursable contract types, this evaluation criteria is restrictive to Human Capital and Training companies whose contracts are primarily procured under those vehicles, while providing unwarranted advantage to vendors that only perform these services as ancillary functions to their core capabilities which require cost reimbursable contracts.</p>	Section	Element	Point Value	Number of Potential Occurrences	Total Max Points Per Element		Total Max Possible Points		L.5.3.2.6	The project is inclusive of Cost-Reimbursement.	25	2 50	<p>The HCaTS team will revisit the allocation of points for each scoring element.</p>	<p>Scoring</p>
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<p>L.5.3.2.1, M.7 Training and human capital projects, unlike IT projects, tend to be shorter in duration and smaller in scope. While we agree that size of project can be an indicator of capability, the majority of training and human capital projects are under \$250,000.</p> <p>Comments/Suggestions: Suggest the government remove the words “on an annual basis” from this section.</p> <p>Second, we suggest the government lower the dollar threshold for the assignment of points to accurately reflect the nature of this work. Points should only be given for projects greater than \$250,000.</p>	<p>HCaTS team will revisit the tier break down of this scoring element.</p>	<p>Scoring</p>												
<p>Will there be an assigning different weighting or point scores based on scope and performance differences between prime contracts generally and First-Tier subcontracts?</p>	<p>HCaTS team is contemplating allocating additional points for Relevant Experience Projects performed by First-Tier Subcontractors, but not as much as Relevant Experience Projects performed by Prime Contractors.</p>	<p>Scoring</p>												
<p>Is there now placing equal weight on First-Tier subcontracts and commercial prime contracts?</p>	<p>HCaTS Team is contemplating allocating additional points for Relevant Experience Projects performed by First-Tier Subcontractors, but not as much as Relevant Experience Projects performed by Prime Contractors.</p>	<p>Scoring</p>												
<p>Under which SB Pool does the government anticipate acquiring training development? If the answer is SB Pool 1, the government will be accepting significant risk. Very few small businesses under the \$11M size standard will have the experience, necessary and appropriate staff to produce interactive multimedia instruction (IMI) which is SCORM compliant. Most small businesses producing web-based IMI fall in the \$15M to \$27M size standards. NAICS Code 611430, Professional and Management Development Training is not for training development. Careful review of this code reveals that it is for delivering training for professional and management development. This type of training is frequently delivered by a single training consultant. The \$11M size standard is appropriate for this type of activity but very restrictive when the government is trying to acquire complex, sophisticated web-based IMI.</p>	<p>Training development fits under both Pools since they have identical scopes that are defined by all three Key Service Areas (KSAs). Training development fits under KSA 1 Customized Training and Development Services. As the KSAs define the complete scope of HCaTS and HCaTS SB, there may be some parts of the eight NAICS Codes' definitions that are not within scope.</p> <p>Task Orders will be issued under the Pool that contains the predominant NAICS Code for that task order.</p>	<p>Size Standard</p>												

<p>· In order to meet the qualifications for a Small Business, will the Prime offeror need to qualify as a Small Business at the time of Proposal Submission or at the time of contract award?</p> <p>o Based upon the current estimated timeline, the time between proposal submission and contract award could exceed 6 months. This extended period of time could affect the status of a company.</p>	<p>In accordance with FAR 19.301-1 Representation by the offeror. (a) To be eligible for award as a small business, an offeror must represent in good faith that it is a small business at the time of its written representation. An offeror may represent that it is a small business concern in connection with a specific solicitation if it meets the definition of a small business concern applicable to the solicitation and has not been determined by the Small Business Administration (SBA) to be other than a small business.</p> <p>Therefore, Offerors shall represent their business size in good faith at time of proposal submission.</p>	<p>Size Standard</p>
<p>Please reference: Draft RFP Page 84 "Pool 2: Size Standard \$15M". How are the size standard of \$15M defined? Are they defined by the three year average of receipts or revenue or another method? Please clarify.</p>	<p>The methodology to calculate your business size can be found in FAR Section 19.101.</p>	<p>Size Standard</p>
<p>How will the Government verify the size standard of the Offeror when applying for a specific Pool(s)?</p>	<p>Determinations will be based on the Offeror's SAM record.</p>	<p>Size Standard</p>
<p>Page 119 of the RFP: Pool 2 \$15M Size Standard Table- NAICS Codes / Would the government consider adding 541614 (Process, Physical Distribution, and Logistics Consulting Services) as a NAICS Code under Pool 2, as it is the same \$15M size standard and is often used for similar services, to include training and human resources, as well as, those under KSA 3- pertaining to process improvement?</p>	<p>This recommendation was considered and the RFP will not be amended.</p>	<p>Size Standard</p>
<p>Section H.3.1, Set Asides Based on Socio-Economic Group. Is there a reason why socio-economic set asides are designated using a "rule of 3" (the presence of at least 3 responsible Contractors within the socio-economic category), whereas the usual Government practice is to apply the "rule of 2" (the presence of at least 2 responsible Contractors to fulfill the requirement)? Conformance to the standard practice of "the rule of 2" seems to make more sense to ensure HCaTS SB is aligned with existing Federal regulations for Contract Officers.</p>	<p>To ensure that the Rule of 2 from the FAR may be achieved, we are ensuring that there will always be at least two contractors that are able to respond.</p>	<p>Socio-economic</p>
<p>Section B.1.7, Minimum Guarantee and Maximum Ceiling. Please note that the SBA-mandated ceiling on awards to 8(a) certified small companies is \$4 million. We recommend OPM/GSA confer with the Small Business Administration about the rules governing this maximum ceiling amount to ensure HCaTS SB is in alignment with these SBA regulations</p>	<p>The ceiling on awards to an 8(A) Certified Small Business only applies to sole source awards. The HCaTS contracts are being awarded competitively and therefore this ceiling does not apply at the contract level. Ordering Contracting Officers awarding sole source task orders to HCaTS contractors will have to be in compliance of this ceiling as well as all other regulations.</p>	<p>Socio-economic</p>
<p>In reference to the set-aside rule "for a specific socio-economic group when it is anticipated that offers will be obtained from at least three responsible small business concerns within a specific socio-economic group under the corresponding NAICS Pool?" Are there exemptions to this considering the Federal government's universal "rule of two" regulation as it pertains to HUBZone companies?</p>	<p>To ensure that the Rule of 2 from the FAR may be achieved, we are ensuring that there will always be at least two contractors that are able to respond.</p>	<p>Socio-economic</p>

Will the government please clarify how Offerors should estimate the total dollars to be subcontracted?	The total subcontracting dollars is the amount that your company believes that it will subcontract out in a year if it was to be awarded a contract (for an Individual Subcontracting Plan). This is an Offeror's business decision.	Subcontracting Plan
Section L.5.1.6.1, paragraph four, states, "Demonstrate that its subcontracting plan represents a creative and innovative program for involving small, HUBZone small, small disadvantaged, women-owned, veteran-owned, and service-disabled veteran owned small business concerns in performing the contract." How is "creative and innovative" being defined? Will there be criteria to define creativity and innovation?	Each subcontracting plan is unique and will be evaluated based on its own merits. Each subcontracting plan will be reviewed by the Office of Small Business Utilization (OSBU) and SBA, which will make recommendations to the HCaTS Contracting Officer, who may enter into discussion with the Offeror to address any concerns.	Subcontracting Plan
In the table on p. 106, section L.5.1.6 Subcontracting Plan, we assume that the small business goal of 50% for the government is higher than the level the government expects Contractors competing for the unrestricted HCaTS contract to use in their subcontracting plans. Otherwise, the cost of competing for and administering the contract would seem to be too high relative to what the Prime Contractor will get out of the contract.	Each subcontracting plan is unique and will be evaluated based on its own merits. Each subcontracting plan will be reviewed by the Office of Small Business Utilization (OSBU) and SBA, which will make recommendations to the HCaTS Contracting Officer, who may enter into discussion with the Offeror to address any concerns.	Subcontracting Plan
L.5.16 Is there still an expectation of a 50% small business subcontracting goal on the Unrestricted solicitation even though there is a separate SB-set aside award?	Yes. All other than small business concerns shall submit a subcontracting plan in accordance with 52.219-9.	Subcontracting Plan
G.3.3 Does the reference to plural Individual Subcontracting Plans mean that ordering activities can require subcontracting plans on task orders?	No, G.3.3 refers solely to the requirement for a Subcontracting Plan at the contract level.	Subcontracting Plan
Which entity will receive credit for small business awards, GSA, OPM, or the ordering agency?	The Ordering agencies will receive credit for the subcontracted dollars.	Subcontracting Plan
Section A.2 suggests any project exceeding \$650,000 has to include a plan to involve small, HUB zone small, small disadvantaged, women-owned, veteran-owned, and service-disabled veteran owned small business concerns. However, the nature of the work may prohibit subcontracting due to lack of expertise or it may increase risk and cost to the government. We suggest contractors be held to contract-level subcontracting goals and not at the task order level.	All other than small business concerns shall have an approved subcontracting plan incorporated in the contract.	Subcontracting Plan
Section G.3.3, Subcontracting Plan. The verbiage in paragraph #2 is a bit unclear. We recommend revising this paragraph to make it clear that submission of SF 294 Report and Summary Subcontract Reports (SSR) is voluntary for those HCaTS SB participants that have voluntarily submitted Subcontracting Plans, and not a mandatory requirement for all HCaTS SB participants.	The RFP will be amended to reflect your recommendation.	Subcontracting Plan
In reference to the requirements in Section L.5.3.3 for meeting small business goals, are we allowed to use a subcontracting report at the contract level for IDIQs (such as OPM-TMA), BPAs, and Federal Supply Schedules (such as GSA MOBIS)?	Yes, as per the RFP "If a subcontracting plan does not exist for an individual Relevant Experience Project, the Individual Subcontracting Report (ISR) or SF 294 report associated to the Relevant Experience Project under a subcontracting plan at the master contract level shall be submitted."	Subcontracting Plan

<p>The solicitation discriminates against companies that have not been on contracts with small business plan requirements EVEN IF the offeror has given significant work to small businesses.</p> <p>There are 600 points for meeting total small business subcontracting goals. Some contracts do not require specific goals (including the previous TMA contract), so companies could end up being scored zero for this even if they subcontracted work to small businesses.</p> <p>Possible mitigation strategies:</p> <ul style="list-style-type: none"> • Accept small business plans at a corporate level based on GSA schedule small business plans. • Allow firms to demonstrate small business participation with invoices against contracts versus government forms 	<p>In order to validate an Offeror's claim that they met the subcontracting goals for a previously approved subcontracting plan, we will only accept an ISR or SSR for that Relevant Experience Project.</p> <p>However, an Offeror can substantiate their claim that they have teamed or subcontracted with at least three other entities with invoices, assuming that we can validate the relationship with the Offeror and the entities for that specific project can receive points under that scoring element.</p>	Subcontracting Plan
<p>Beyond the overall small business subcontract plan required at contract formation, specific subcontracting goal requirements should be negotiated at the time of task order competitions and subcontracting plan compliance should be evaluated on a task order by task order basis. It is only at that level, when specific requirements are known, that truly effective and relevant subcontracting plans can be created.</p>	<p>In accordance with FAR 19.702, "Any contractor receiving a contract for more than the simplified acquisition threshold must agree in the contract that small business, veteran-owned small business, service-disabled veteran-owned small business, HUBZone small business, small disadvantaged business, and women-owned small business concerns will have the maximum practicable opportunity to participate in contract performance consistent with its efficient performance." Therefore, a subcontracting plan must be agreed to at the contract level.</p>	Subcontracting Plan
<p>Contractor subcontract plan compliance should be recorded on a task order by task order basis, could be an evaluation factor in the source selection for future task order awards, and should be a factor when evaluating whether to "off-ramp" HCaTS contract holders.</p>	<p>An Offeror's subcontracting reports will be reviewed and noncompliance is grounds for off-ramping.</p>	Subcontracting Plan
<p>The draft RFP states, "all projects and past performance submitted in response to this solicitation shall have been performed as a Prime Contractor." Does this preclude a small business from utilizing a subcontractors past performance in order to qualify for the opportunity?</p>	<p>The HCaTS team will amend the RFP to also allow First-Tier Subcontractors to submit experience earned under a Prime Contractor's contract, task order and/or purchase order. All experience performed as a First-Tier Subcontractor will be considered a non-Federal government project.</p>	Subcontractors
<p>Section L.5.2.3.6 says that additional points will be given for teaming with 4 or more entities. Do 1099 personnel count as subcontractors?</p>	<p>No, 1099 personnel do not count as subcontractors. This requirement has been amended to allow points for 3 or more subcontractors.</p>	Subcontractors

<p>Even if subcontractors' qualifications cannot be used to fulfill that requirement, will the Government still consider subcontractor's experience and expertise as part of the overall team's capabilities in evaluating the proposal?</p>	<p>The HCaTS team will amend the RFP to also allow First-Tier Subcontractors to submit experience earned under a Prime Contractor's contract, task order and/or purchase order. All experience performed as a First-Tier Subcontractor will be considered a non-Federal government project.</p> <p>No, the only time an Offeror can use a teammate's past performance is under an existing Joint Venture. When submitting a proposal as a Joint Venture, all Relevant Experience Projects and associated past performance information shall have been awarded under the existing Joint Venture's DUNS Number and not the individual members making up the Joint Venture.</p>	<p>Subcontractors</p>
<p>Please confirm that it is acceptable for offerors to pursue an HCATS prime contract award themselves and also be included as a subcontractor on another Prime's offer.</p>	<p>Yes, a company may submit a proposal even if a company that they have worked for as a subcontractor is also submitting a proposal. An Offeror's subcontractors are not part of their proposal.</p>	<p>Subcontractors</p>

<ul style="list-style-type: none"> • Allow relevant experience from the Prime offeror or an exclusive teammate. X interprets Section L.3.1 of the draft RFP, Official Legal Entity, as allowing only the experience and other qualifications of the offeror for evaluation purposes, much like the OASIS procurement. Hence, the qualifications of any teammates/subcontractors could not be used or counted for evaluation. X believes that this approach is both unnecessary and detrimental to GSA's and OPM's stated intent to have the best qualified providers under the HCaTS vehicle. As industry has plainly stated in numerous fora and would be easily confirmed by market research, no single company has the breadth and depth of expertise to fully meet the full suite of services that fall under the banner of human capital or training. For example, in the service area of human capital, compensation analysis and labor relations management are two important but highly specialized fields for which the best providers are niche players with deep but narrow expertise in these fields. To get the best providers able to provide the full suite of either human capital or training services will require a team of contractors and GSA, OPM, and their government customers would benefit from those teams being assembled prior to contract award and evaluated based on the collective qualifications of the team. Hence, X recommends that GSA change the RFP to allow an offeror to include the relevant experience of a subcontractor, provided that the majority of relevant experience cited is from the prime itself. Further, X believes that this approach only makes sense with the restriction that such experience may be used only if the subcontractor is exclusive as a subcontractor to that offeror AND not bidding as a Prime in that portion of the competition. In other words, a large business could be a (exclusive) teammate to a Prime in both the small business competition and the full and open competition but not submit a proposal as a Prime. Similarly, a small business could be an (exclusive) teammate to another business in the full and open competition and submit a prime proposal in the small business portion but not in the full and open. This restriction will prevent certain companies with compelling relevant experience from using that to bolster the competitive position of multiple offerors and thereby distorting the competition away from a sufficiently large and diverse set of awardees. 	<p>The HCaTS team will amend the RFP to also allow First-Tier Subcontractors to submit experience earned under a Prime Contractor's contract, task order and/or purchase order. All experience performed as a First-Tier Subcontractor will be considered a non-Federal government project.</p> <p>However, when submitting a proposal as a Joint Venture or Contracting Teaming Arrangement (CTA), all Relevant Experience Projects and associated past performance information shall have been awarded under the existing Joint Venture's DUNS Number and not the individual members making up the Joint Venture or CTA. A member of the CTA or Joint Venture may not use a contract or task order awarded to the CTA or Joint Venture on their individual proposal.</p>	<p>Subcontractors</p>
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<p>RFP Section L.4, Proposal Format. The RFP states, “The Offeror’s proposal shall be formatted into one zip file, if possible, with each volume composed as a separate folder within the zip file. If the proposal does not fit in one 25MB zip file, then the Offeror shall create more than one zip file so long as each zip file contains a full volume of the proposal. A volume shall not be split into multiple zip files.” Comment: Based on our experience preparing our proposal for OASIS, we believe that it is likely that Volume II will exceed the 25MB threshold, even after the files are compressed into ZIP files. The number of scanned pages necessary to substantiate bidders’ asserts regarding their relevant experience projects—which could number as many as 12 projects if bidding both pools—will likely exceed that limit. We recommend that GSA permit Offerors to split a volume into multiple clearly named ZIP files if necessary due to file size constraints. Alternatively, GSA could choose to change the delivery approach from email to delivery of a CD or DVD, which would eliminate file size issues related to proposal transmission.</p>	<p>This requirement has been revised and the only accepted method of proposal submission will be via DVD+R. The final RFP will reflect this change.</p>	<p>Submission</p>
<p>RFP Section L.4.1, Proposal Format Table; L.5.2.2, Scoring for the Relevant Experience Projects; L.5.2.3, Points for Relevant Experience Projects. Question: Does GSA anticipate that, like in the OASIS procurement, one of the mandatory forms will enable Offerors to provide a small amount of text (e.g., 200 words) to explain how the provided contractual documentation substantiates each of the scoring elements? While preparing our OASIS proposal, we found that it wasn’t always immediately obvious how the contractual documents substantiating our assertions. We believe that in the case of OASIS, Offerors’ ability to provide a very short explanation of the documents provided and what they showed probably made it easier for the Government to validate Offerors’ self-scores. We recommend that GSA take a similar approach in HCaTS, especially to substantiate individual or multiple KSAs associated with a project.</p>	<p>Yes, the Self-Scoring Sheet (Attachments J.5.1 and J.5.2) has a space for the Offeror to explain how the Relevant Experience Project is within scope of the KSA(s) that the Offeror is claiming. The Offeror will also have to list the supporting contractual documents that demonstrate the scope of the project and state where the Government should look to find this information. It is recommended that the relevant sections be highlighted and the Offeror will just need to state the page numbers and state that the areas that are highlighted demonstrate the scope.</p>	<p>Submission</p>
<p>11. Page 140, please clarify appropriate volume numbers in the table.</p>	<p>The Final RFP will have the appropriate volume numbers identified.</p>	<p>Submission</p>
<p>After issuing notice on or about May 19th, what is the estimated time the response due date due to the large volume of information to compile and transmit.</p>	<p>The Government will provide no less than 30 days. In the event that additional time is needed the RFPs can be amended to allow it.</p>	<p>Submission</p>
<p>L.4. Is there a desired naming convention for the zip file or files containing the entire proposal as there is for the individual files identified in L.4.1?</p>	<p>This requirement has been revised and the only accepted method of proposal submission will be via DVD+R. The final RFP will reflect this change. The zip files or folders shall be named according to Volume number.</p>	<p>Submission</p>
<p>Section L.4, Proposal Format. The transmission of proposal financial data and other sensitive information via unencrypted emailed files seems risky from a cybersecurity standpoint. Allowing proposal files to be password protected and/or encrypted to prevent unauthorized access by external parties (read: by hackers and cybercriminals) seems prudent. We recommend allowing the submission of password protected and/or encrypted files, if email is to be the only form of electronic proposal submission allowed. Zip files can be password protected.</p>	<p>The RFP will be amended requiring all documents to be downloaded onto a DVD+R. Offerors will be allowed to password protect the files and the RFP will be amended.</p>	<p>Submission</p>

Due to technical problems, GSA has been unable to include some contracts in eSRS. Will the government accept paper versions of ISR/SF 294 or SSR/SF 295 if they have been submitted to GSA but are not available in eSRS?	The RFP will be amended requiring all documents to be downloaded onto a DVD+R.	Submission
Will the government accept paper versions of ISR/SF 294 or SSR/SF 295 if the offeror can demonstrate that GSA has been unable to include our contract in eSRS?	The RFP will be amended requiring all documents to be downloaded onto a DVD+R.	Submission
Section G.2.4, paragraph three, line item five, states, "Allowing a reasonable time for fair opportunity proposal submission." Can the government provide an estimate of a typical turnaround time for responses to a task order proposal? How will the government determine which of the IDIQ winners are selected to bid on individual task orders?	The acquisition strategy, evaluation methodology and award criteria are determined by the Ordering Contracting Officer based upon the specific requirements of that acquisition. Since so many different requirements can be awarded at any time throughout the fiscal year from any Federal agency, it is difficult to come up with a typical turnaround time.	Task Order
Section G.3.2.1, paragraph one, line item 14, states, "Contract Type for each CLIN." Is it possible that there could be different CLINs within the same task order that are different contract types?	Yes, that is a possibility.	Task Order
Section G.4, concerns task order closeouts. Will there be guidelines concerning the minimum or maximum amount of time upon completion of the work that a task order must be closed out?	The FAR and agency supplements prescribe when a task order is to be closed out.	Task Order
H.19: Reduce the Minimum Task Order Award Requirement. GSA establishes a minimum of three task order awards or a total task order estimated value of \$1 million prior to the first option year being executed under HCaTS SB. We appreciate the importance of each prime being active in the competitive process, but view this as a very aggressive minimum assuming there are approximately 40 primes in each Pool and both the small and unrestricted HCaTS contracts. We encourage GSA to closely review the task order pipeline to ensure this minimal award requirement is realistic.	The RFP will be amended to include language allowing Contractors to substantiate a good faith effort in responding to solicitations solicited under their respective Pool(s).	Task Order
H.4.2. Does the reference to "set aside" task orders mean that ordering agencies can set-aside task orders on the unrestricted HCaTS contract or does it refer to an order made against the small business HCaTS contract?	An Ordering Contracting Officer will be permitted to set aside a task order in accordance with the FAR and agency supplements.	Task Order
Reference: B.2.3 COST , last sentence, "Cost Reimbursement task orders shall only be used for the acquisition of non-commercial items." Question: What is an example of a non-commercial (a) training and development service, (b) human capital strategy service, and (c) organizational performance improvement service?	The determination whether or not an acquisition meets the definition of commerciality is with the discretion of the Ordering Contracting Officer.	Task Order
Section B.3 (Page 9) notes that HCaTS ceiling rates that are in effect at the time of a task order award shall remain with the task order award during the entire term of the task order, including task orders with options. We interpret this to mean that rates proposed on task orders may be escalated, but that future changes to the HCaTS ceiling rates will not affect escalated rates on task orders that have already been awarded. Can GSA please confirm that task order rates may be escalated consistent with the HCaTS ceiling rates in effect at the time a task order is awarded?	Yes, if the task order solicitation permits escalation rates for future years, this methodology is permitted.	Task Order