

| QUESTION NUMBER | DRAFT RFP SECTION NUMBER | COMMENTS/QUESTIONS/SUGGESTIONS |
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| RECOMMENDATIONS: | | |
| 1 | H.3.1, Page 39 | We recommend that the Government consider reducing or eliminating set-asides for specific socio-economic groups, as it may reduce competition and otherwise eliminate companies that may be able to offer the best value to the Government for a particular task order. Should the government decide to keep these set-asides, then we suggest that the Government include other specific socio-economic groups, such as Minority-Owned, Small Disadvantaged Businesses. |
| | | RESPONSE: Thank you for the input, but we disagree with the recommendation. The OASIS Program fully supports the small business community as a whole, including all socio-economic groups specifically identified and authorized for set-asides in the FAR. Taking the position that conducting set-asides reduces competition is akin to saying that there should be no OASIS SB, as that is a 100% set-aside. We simply disagree with that position. With regards to what groups are eligible for set-aside, that is an issue determined by regulation and law, not by our choice. We are allowing all set-asides authorized by the FAR. |
| 2 | H.7.5, Page 50 | We suggest that the Government remove the requirement of attaining a minimum of three task order awards for the exercise of Option 1. While we understand the necessity of having active and involved contractors within the OASIS pools, individual contractors do not have control over the number or type of opportunities that will be offered to each pool. It is possible that three or more appropriate opportunities for a contractor's skill set may not materialize over the first five-year period, yet that contractor may still offer services or solutions that would provide value to the government for emerging needs during the option period. |
| | | RESPONSE: There are two issues to address here. 1. We do not feel that winning 3 task orders within a 5 year period is overly burdensome for OASIS SB contract holders. Where applicable and within scope, we expect OASIS and OASIS SB contract holders to bring their existing business to the OASIS contracts and a five year time frame is ample time to do so. If a SB contractor cannot win 3 task orders within a 5 year window, then we feel that OASIS SB may not be a good fit for that contractor and we may attempt to find a different contractor who might be more successful. 2. Simply because we reserve the right to do something in the contract, doesn't mean that we have to. Regarding any contract performance issue, the OASIS team plans to collaborate extensively with the Contractor prior to invoking Dormant Status, Off-Ramping, and/or not exercising an option. We will be fair and reasonable with all OASIS and OASIS SB Contractors after award and want nothing more than the shared success of all members of our extended OASIS family. |
| 3 | H.11.1 and H.11.2, Pages 53-55 | We recommend that the Government remove the requirement that the contractor "demonstrate successful performance under the OASIS SB contract" in order to be eligible for lateral or vertical pool ramping. While it makes sense to require successful performance should a contractor be awarded a task order, it is possible that a contractor's organic growth independent of OASIS may occur prior to receiving a task order award, thereby making the contractor ineligible to bid on future task orders. Under the draft requirements, this contractor would essentially be "locked in" without the ability to move to a new pool because they do not have a track record with OASIS and will not have the opportunity to achieve that track record due to their growth. This situation may create a disincentive for contractors to seek inclusion in a particular pool if there is not sufficient flexibility for growth and success. |
| | | RESPONSE: OASIS SB contractors will not recertify size standard until the 5 year point. A contractor will be required to win at least 3 task orders by this point. Accordingly, we feel that the suggestion is moot. |
| 4 | L.2.3, Page 73 | We recommend that the Government increase the number of awards in each pool. We believe a larger pool of qualified companies will provide greater competition and better potential value to the Government. |
| | | RESPONSE: We selected 40 contractors based on our historic IDIQ experience. We will closely monitor competition levels at the task order level and on-ramp additional contractors when and if that becomes necessary. |
| 5 | L.3, Page 74 | We recommend that the Government allow proposals for teaming arrangements (including prime and subcontractor arrangements) for OASIS. As the Government is seeking business-based solutions through OASIS, rather than technology-specific solutions, offerors may be able to provide more comprehensive solutions through a teaming arrangement. This is especially true for small businesses, as small businesses by necessity tend to be more specialized entities than larger, full-service firms. |
| | | RESPONSE: Please see a number of responses to questions for the OASIS team opinion regarding teaming. |
| 6 | L.5.3.1, Page 80 | We recommend that the Government remove the requirement that the primary scope of the relevant experience projects be within one of the six OASIS Core Disciplines (Minimum Condition 1). Our rationale is that the six core disciplines are fundamental components of numerous government contracts, but are not always framed as such within the RFQ or contract documentation. For example, a contract may have a stated primary scope such as "implementing an IT system". This hypothetical contract may include Program Management, Management Consulting, Engineering, and Logistics as fundamental aspects/tasks, but they are not defined as such within the statement of scope. We suggest that should the Government wish to retain the requirement, the contractor should be allowed to demonstrate that the relevant project incorporated these core disciplines even if they were not specifically designated as the "primary scope". |
| | | RESPONSE: While we understand the rationale for your recommendation, we have reservations about considering an experience project as "relevant" when it could not be performed under the OASIS or OASIS SB contract. |
| 7 | Section M, M.5, Pages 89-96 | As a general matter, we believe that the evaluation criteria overemphasize certifications and form as opposed to substantive experience and capability. For example, several of the evaluation criteria award a considerable amount of points for items such as past performance contract size and various certifications. This criteria may not be the most appropriate for the OASIS Small Business vehicle, as many small businesses have not yet had the opportunity to service large contracts or pursue official certifications due to financial and business reasons, even though the company may incorporate standards and industry best practices (such as ISO 9001 and CMMI) into its management and technical processes. We believe the evaluation criteria, as currently structured, may unnecessarily eliminate many qualified companies and reduce the overall level of competition. We believe that more emphasis should be placed on the substantive nature of past experience and current capabilities to provide a high level of service, rather than contract value and formal certification. |

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| | | RESPONSE: The scoring system places the highest amount of points on Past Performance. The second highest amount of points rests with Relevant Experience. Finally, Systems, Certifications, and Resources account for the lowest amount of potential points. We are not looking for all businesses to receive an OASIS or OASIS SB award. We are looking for companies who have actual relevant experience, actual successful performance, and existing systems, certifications, and resources. An Offeror who claims to incorporate the standards of ISO 9001 is not the equivalent of an Offeror who has been certified for doing so. Finally, the scoring system does not eliminate any Offeror, it only distinguishes between Offerors, which is what the source selection process is all about. We are looking for the Highest Technically Rated Offerors in these solicitations. We feel this evaluation approach will be successful in finding those Offerors. | |
| 8 | OASIS SB - Section L.5.3.1 Relevant Experience Minimum Requirements - Pages 80-81 | I think the requirements are too difficult for many small businesses to attain. Small businesses often have a balance of prime and sub work, where subcontracting is the starting point and usually the larger portion of work as you need the past performance prior to bidding prime work. Requiring 5 distinct Prime contracts having a value of at least \$2M a year is a challenge for many small businesses. First, 5 Prime contracts of at least \$2M a year would mean you have most likely already outgrown the \$14M NAICS size standard (assuming subcontracting work too), which would eliminate participants in Pool 1. Additionally, having 5 Prime contracts of that size within the scope of OASIS is a high hurdle for any potential Pool 1-3 candidates. Suggest requiring 1 or 2 contracts of the \$2M size standard vs. all 5 Prime contracts. | |
| | | RESPONSE: We have revised the minimum requirements. Please see the changes blog. | |
| 9 | OASIS SB and Unrestricted - Section L.5.3.1 Relevant Experience Minimum Requirements - Pages 80-81 | Cost-Reimbursement requirement is a high hurdle for businesses of any size. This is out of the control of the contractor. If the acquisition departments within the agencies we support prefer Labor Hours or Firm Fixed Price, we can't possibly obtain Cost-Reimbursement Contracts. If the scope of OASIS is to determine contractors who have the past performance and personnel who can perform the work, the mode of the contract shouldn't be considered. If the firm has a DCAA approved financial system, then Cost-Reimbursable contracts are feasible. Suggest lifting this requirement on both OASIS SB and OASIS Unrestricted. | |
| | | RESPONSE: Cost Reimbursement work is dominant in the field of professional services. Approximately half the dollars spent in professional services Government-wide was spent on a cost reimbursable basis. Audited accounting systems are required to perform this kind of work and having an audited accounting system is a firm requirement of this contract and the clients it will serve. EDIT: We have changed the Acceptable Accounting System requirements. | |
| 10 | OASIS SB and Unrestricted - Section L.5.3.1 - pages 80-81 SB, 85 Unrestricted | The requirement for involvement and / or integration of 4 out of the 6 OASIS Core Disciplines in the Unrestricted and 3 out of the 6 in the OASIS SB is very restricted. How will the government evaluate as this is dependent upon how the statement of work is worded, how the acquisition office awards tasks (i.e., they may separate the work streams), and assume the timing of all work streams aligns. Understanding the government would like to obtain companies that have performed these complex tasks, the current requirements are very restrictive and do not necessarily relate to the most qualified companies. Suggest removing this requirement from all 5 Prime contracts to 1 Prime Contract. This would provide the government with the past performance demonstrating the integration of the OASIS disciplines has occurred. | |
| | | RESPONSE: We have allowed for not only the Statement of Work to be provided to validate performance of core disciplines, but also contractor proposals as well. Additionally, you can provide Performance Work Statements, Statements of Objectives, and/or Work Breakdown Structures for validation. There should be some indication of the core disciplines you have performed within one or more of these documents. | |
| 11 | L.5.3.1 | It is noted that small businesses must have five distinct past performances as a prime contractor. Can this be modified to be five distinct past performances as either a prime contractor or a subcontractor? | |
| | | RESPONSE: We are in the draft mode right now, so anything is possible, but we asked for Prime experience because we wanted contractors with the ability to win requirements, put together teams, and be responsible for the outcomes. This is very important to us and our clients as well. | |
| 12 | L.5.3.1 Page 80 | The relevant experience is requiring FIVE projects as a PRIME contractor that are over \$2M per year. This requirement is very restrictive for a SB and will reduce competition. Suggest decreasing the number of cites to be THREE, allowing SUB contracts, and reducing the value to over \$1M per year. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under advisement. EDIT: We have lowered the requirements in this area. Please see the changes blog. | |
| 13 | L.5.3.1 Page 80 | The relevant experience instructions (#1) state the projects must have the "primary scope of work in 1 of the 6 OASIS Core Disciplines". Suggest rewording to clarify that the "primary scope of work in one or more service areas within at least 1 of the 6 OASIS Core Disciplines". | |
| | | RESPONSE: Thank you for the recommendation. We will take it under advisement. | |
| 14 | L.5.3.1 Page 80 | The relevant experience instructions (#2) state the projects must "involve the performance and/or integration of at least 3 out of the 6 OASIS Core Disciplines". Suggest rewording to clarify that the projects must "involve the performance and/or integration in one or more service areas within at least 3 of the 6 OASIS Core Disciplines". | |
| | | RESPONSE: Thank you for the recommendation. We will take it under advisement. | |
| 15 | Section L.3, Page 75 | Section L.3 prohibits competition for those large businesses structured by subsidiaries, and legal entities. To not limit competition, and allow such structured companies to compete for contract award on the OASIS Solicitation, we request GSA replace the restrictive language in the Draft OASIS Section L.3 with the language from the GSA Alliant Contract Section L.12.2.h (listed below). The current requirements within the Draft OASIS Solicitation are written in such a manner as to indicate that a large business, if prohibited from utilizing its subsidiaries and legal entities, can proceed to bid within the six pools as long as the Company's entities fall within those size standards. Is this the intent on GSA's part to allow for a large business not structured in such a way as to bid as large business to be able to bid within as many of the six pools as feasible? GSA ALLIANT L.12.2.h... | |
| | | RESPONSE: We have changed the requirements in this area. Please see the changes blog. | |

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| 16 | OASIS SB and Unrestricted - Section L.5.3.1 Relevant Experience Minimum Requirements - Pages 80-81 - Clarification to Response #9 | Clarification Request: The government requests "At least One project must be for work performed under a Cost-Reimbursement contract type". As a professional services small business, we have not performed any Cost-Reimbursement Contracts since the acquisition departments within the agencies we support prefer Labor Hours or Firm Fixed Price contracts. We have a DCAA approved financial system, and therefore are able to comply with a Cost-Reimbursable Contract, but have not performed one. Since the audited financial system allows for Cost-Reimbursable, we request lifting the requirement on both OASIS SB and OASIS Unrestricted that one of the five projects must be Cost-Reimbursable. | |
| | | RESPONSE: We have changed the requirements in this area. Please see the changes blog. | |
| 17 | Section M.5 starting on Page 94 | The scoring system includes a scored item for AS9100 certification. We do not understand how this certification applies or brings value to several of the pools and request that it be removed from scoring across all pools. | |
| | | RESPONSE: Scoring is not tailored to individual Pools. Scoring is universal across all Pools. The AS9100 certification is of relatively low scoring impact, but we will take this recommendation under advisement. | |
| 18 | Section L.5.1.7 on Page 79 | Page 79 includes requirements for CTA arrangements. These restrictions appear to be overly stringent for small businesses. Unless a small business has been fortunate enough to be included in a prior CTA for a reason other than for OASIS, they are not allowed to form a CTA for the purpose of an OASIS bid. In addition to the CTA restrictions, a small business cannot include subcontractors in their proposal or use their qualifications or past performance. We believe that the CTA requirement is overly restrictive. While we understand that OASIS is a long term arrangement, it appears that these restrictions will greatly limit GSA from receiving strong bids from good companies. In addition, we believe that this restriction provides unfair advantage to certain companies that have, for reasons unrelated to OASIS, are members of a CTA. We request that GSA remove the CTA restriction, so that small businesses can actually form a CTA for the purpose of competing for an OASIS award. | |
| | | RESPONSE: Please see the various responses regarding teaming. | |
| 19 | General Question | We see no difference between the unrestricted OASIS and OASIS SB drafts except for subcontracting plans, accounting systems and changes in limits and points within the scoring sheets. We believe that there is not enough consideration of the limitations that small business have in relationship to large businesses and that the criteria for small businesses is overly restrictive. Examples include points allocated for multiple certifications which many small businesses do not have and cannot afford to obtain, limitations of forming CTAs, revenue limitations within the scoring sheet for small businesses that start at \$3 million annually which is a substantial contract award for small companies, much less the larger revenue amounts of \$4 Million and \$5 million in the score sheet. We recognize that GSA is trying to allow for ranges in scoring, but even the lowest ranges are ominous for many small businesses that could otherwise perform OASIS work. Request that GSA review the small business criteria and revise it so it is more reasonable for small businesses. | |
| | | RESPONSE: Only Pass/Fail factors can be restrictive. Scoring systems do not prevent a company from submitting a proposal and are not restrictive by definition. Points and scoring only serve to distinguish between contractors. If no SBs within a given pool score within a point category, then the category has no bearing on the outcome of the Top Rated Offerors. However, if some SBs do obtain those points when most do not, then that is an effective segregating factor. We feel that we will obtain a very highly qualified group of Contractors for both OASIS and OASIS SB with the current approach, but we are also listening and considering all feedback received. We are currently working on edits to both contracts that we will share as soon as they are vetted and decided upon, which should be soon. | |
| 20 | Section F.4.1; page 24; Table Section G.3.4.1 | Recommend deleting this deliverable, since the Government is responsible for entering CPARS data. The contractor's CPARS responsibility to review their ratings/comments is covered in para F.4.2, Section G.3.4. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under advisement. | |
| 21 | Section L.5.1.7, page 79 | Small Business concerns generally team to integrate strengths needed to fulfill the requirements of a specific solicitation. The OASIS requirement to limit CTAs to an existing CTA Partnership or Joint Venture appears to seriously limit SB opportunity to propose to the OASIS solicitation. Recommend removing the requirement that CTAs be existing to promote competition and provide best value to the Government. | |
| | | RESPONSE: Please see earlier response regarding teaming. | |
| 22 | Section L.5.3.1, page 80 | The requirement to provide 5 relevant project experiences valued at least \$2M per year appears to be unduly stringent for SB concerns that intend to propose under Pool 1 with a \$14M threshold. To provide best value to the Government, out of the 5 projects required, recommend reducing the required number of relevant projects to 2 that have a total value of \$1M per year for Pool 1 offerors. By reducing the number of contracts and reducing the contract value, the Government will open competition to a larger number of SB offerors, allowing the Government to attain its 40 awardee goal. | |
| | | RESPONSE: We have changed the requirements in this area. Please see the changes blog. | |
| 23 | L.5.3.1 Relevant Experience Minimum Requirements; Page 80 | We suggest maintaining the 5 Relevant Experience Citations, but requiring only 2 to be as a prime. We understand and greatly respect the desire of OASIS to only award to the best possible prime companies. With this in mind, perhaps only lessen the prime requirement for offerors submitting in the \$14 Million Pool. | |
| | | RESPONSE: We will consider your recommendation, but we sincerely feel that there is a large difference between sub experience and prime experience. | |
| 24 | L.5.3.1 Relevant Experience Minimum Requirements; Page 80 | We suggest that for the \$14 Million Set-Aside Pool, that the \$2M/year size requirement be eliminated, as it will preclude companies from demonstrating many of their relevant experiences. | |
| | | RESPONSE: We have changed the requirements in this area. Please see the changes blog. | |
| 25 | L.5.4.2. Past Performance (Proposal Submission, if applicable), Page 82 | Regarding the requirement for the Government to pull all federal project past performance information from the Past Performance Information Retrieval System (PPIRS) database that links to the Contractor Performance Assessment Reporting System (CPARS), this will not be effective if the OASIS team allows for offerors to submit relevant experience information for previous/current work as a subcontractor. For example, we have strong past performance with exceptional ratings from our PRIME contractor, and our prime contractor gets excellent ratings for their subcontractor performance on their CPAR evaluations, but this information will not directly specify our company. For these contracts - all though they do support the federal government - we will need to be allowed to submit a Past Performance Rating Form to our prime contractor for evaluation. Currently, these forms are only allowed for non-federal contracts, or contracts where evaluations have not been completed. | |

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| | | RESPONSE: Thank you for the recommendation. We will take it under advisement. | |
| 26 | M.5 | We recommend increasing the point thresholds on the OASIS SB contract for Relevant Experience to \$3M, \$6M, and \$9M. Although these higher thresholds may seem too large for the Small Business tract, there would be a much less chance for a contractor to be awarded additional evaluation points for performing the exact same work within a higher priced labor market due to performance location requirements. This is also true for professional service contracts that bundle Other Direct Costs such as significant Information Technology hardware and software into a single contract instead of using a separate contract to acquire those items. | |
| | | RESPONSE: Thank you for the recommendation. There was quite a bit of analysis provided with this suggestion and we are very appreciative of that. We will take it under advisement. | |
| 27 | Section L.5.4.3, page 87 | Section L.5.4.3, Socio-economic Past Performance, requires that eSRS reports be provided for the 5 Relevant Experience contracts provided in L.5.3.2. What if a Relevant Experience reference meets the size criteria, but does not have a Small Business Subcontracting Plan associated with the contract? We suggest allowing offerors the opportunity to show their total corporate performance in meeting Small Business Goals for all contracts that have a Small Business Subcontracting Plan and can be verified in the eSRS system. This will allow mid-sized and small companies the opportunity to show their full performance on small business subcontracting. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under advisement. | |
| 28 | M.2 / 95 | On the unrestricted contract, how does a contractor qualify for one of the pools? Is it by simply stating they are interested? Or do they have to have one of the NAICS codes associate with that pool? Having a NAICS code is not a discriminator. Every large company will have one of the NAICS codes associated with all the pools. Therefore, we believe all the large companies will qualify for all the pools. This means that the same 40 large companies will win each of the six pools. Is this the Government's intent? | |
| | | RESPONSE: Offerors will be evaluated in the Pools that they indicate that they desire to be considered for. NAICS codes associated with their Relevant Experience will not be examined. | |
| 29 | M.5, page 101 | Since this is primarily a professional services contract and not a primarily a development contract, we believe that points should only be given for CMM Level 3. Higher CMMI levels are not needed on efforts that are primarily professional services | |
| | | RESPONSE: Thank you for the recommendation. We will take it under advisement. | |
| 30 | M.5, page 100 and Section L.5.3.1, page 85 | The solicitation requires offerors to provide a minimum of 5 Relevant Experience references with a minimum value of \$5 million per year. However, Section M.5 gives 0 points for contracts with a \$5 million per year value, effectively making the minimum \$10 million per year. We believe the requirements of the Relevant Experience and Past Performance significantly advantage the very large contractors. Mid-size companies in the services market generally only have a few contracts with a \$10 million per year or more value, especially in the Program Management, Management Consulting, Logistics, and Financial work areas. A requirement which allows for points at the \$5M per year value will allow for more competition from mid-size companies. | |
| | | RESPONSE: Relevant Experience is provided additional points based upon dollar value because this is a sign of complexity. Past Performance, however, has no basis in dollar value at all. | |
| 31 | Section M.5, page 100 | The scoring system allocates significant points for the execution of larger programs as measured by total dollar value. Since larger programs are not necessarily more complex to manage, do not necessarily represent more work brought to a vehicle, or necessarily have anything to do with delivery performance, we would like to understand why extra points are awarded for deal size. This metric has the potential to favor larger companies without an apparent benefit to a GSA client. As such, we suggest the extra points for large deals be eliminated. | |
| | | RESPONSE: Larger programs at very least require more resources. While they may not always be more complex to perform and manage, they generally are. The scoring system does not favor one type of contractor over another. What the scoring system does is reward Past Performance, reward complex experience, and reward having systems, certifications, and resources necessary to perform complex work. | |
| 32 | Page 11 - B.1.5. Contract Access Fee (CAF) | Ref Govt Feedback Topic 4 – The lower the GSA the more attractive OASIS will be to clients. | |
| | | RESPONSE: Thank you for your feedback. | |
| 33 | Page 29 – G.2.6. | Recommend changing this to, "Any proposed COPM/COCM substitute shall meet or exceed the qualifications listed in G.2.6.1 or G.2.6.2, as appropriate." Rationale: Minimum skills are a better way to gain acceptable substitutes. Using the resume of the incumbent results in a constantly growing skill requirement that eventually greatly exceeds the needed level of experience and education. | |
| | | RESPONSE: Thank you for the recommendation. The intent here was to ensure that Offerors maintained the level of qualifications considered and scored in receiving their contract awards. We will edit accordingly. | |
| 34 | Page 83 - L.5.1.6.2.b. | "It is anticipated that an acceptable subcontracting plan will contain at least the following goals: 50% Small Business..." Bidding OASIS is a major investment for a mid-sized company, and the federal market is in a period of contraction. To make this investment while essentially committing to providing at least half of the business to other companies is a significant burden, restrains trade, and places an unfair burden on capable companies who exceed an arbitrary size standard based on the selected NAICS codes... | |
| | | RESPONSE: You seem to be misinterpreting the 50% subcontracting goal. This goal applies to dollars subcontracted, not total award amount. | |
| 35 | Page 85 - L.5.3.1. | The Relevant Experience Minimum Requirements effectively excludes businesses who have recently outgrown their small business size. While our average revenue has exceeded the \$35.5M of Pool 3 in OASIS SB, and we have been the prime on several IDIQs with total revenue exceeding \$5M annually, individual Task Orders typically do not. We recommend that you reduce the minimum annual revenue to \$3M OR allow companies to group all Task Orders awarded under an IDIQ as one of the Relevant Minimum Experience projects. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under advisement. | |

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| 36 | Page 100 - M.5. | Grading Criteria for L.5.3. Why do you provide additional points for merely having a greater total revenue over the last five years? Quantity is not the same thing as quality. This approach puts companies that have recently outgrown their small business size at a distinct disadvantage. For example, a mid-sized company may have doubled their revenue in the five year period and still not exceed \$50M per year in total award value, while a large business may have lost half of their total revenue and still exceed the \$50M per year. The grading doesn't reflect the company growth or business trend. Recommend you simply have the revenue minimum as a pass/fail and use other quality markers for the points value. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under advisement. | |
| 37 | | I understand the logic behind requiring your small business prime contractors to demonstrate their maturity and capability by providing 5 prime contract reference that each are more than \$2M per year in award value. I like the idea of separating the wheat from the chaff and understand the benefits to GSA... However, relative to the \$14M sized pool I think the requirement will greatly limit the number of firms that can propose on the contract. In my experience, the vast majority of firms that can fit under the \$14M standard do not have 5 ongoing task orders that each generate more than \$2M in revenue per year. For your \$14M pool, I suggest you make some adjustments to the requirement, but still keep the bar fairly high. For example, perhaps for the \$14M pool should continue to require 2 references at the \$2M dollar level, and 3 additional references each at the \$1M dollar level? | |
| | | RESPONSE: We have changed the requirements in this area. Please see the changes blog. | |
| 38 | OASIS SB Draft RFI, L.5.3.1, page 80 | The OASIS SB Draft RFI requires that a minimum total award value of \$2 Million per year apply to work cited for experience. Five (5) such examples are required. It is unlikely that there will be many contractors who meet this requirement while satisfying a size standard associated with Pool 1 and Pool 2 (e.g., \$14M, \$19M). In Pool 1 and 2 this has the practical effect of limiting competition to companies who within the past five (5) years had contracts satisfying the requirement and who no longer have them. Additionally, contractors with five (5) active contracts of such a size would presumably exceed the size standard within the next five (5) years and be subject to being off-ramped from Pools 1 and 2. As such, my suggestion would be to reduce the requirement to \$1M in annual award value for Pool 1 and Pool 2 OASIS small business contractors. | |
| | | RESPONSE: We have changed the requirements in this area. Please see the changes blog. | |
| 39 | OASIS SB Draft RFI, L.5.3.1, page 81 | The OASIS SB Draft RFI requires that projects be completed within the past five (5) years or be ongoing with at least one (1) year of performance prior to solicitation closing date. Believing that a new project on its eighth month of performance is a better barometer the current capabilities of a small business than a project completed 4 years and 11 months ago, I would suggest that the requirement of one (1) year of performance completed prior to the closing date be removed. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under advisement. | |
| 40 | OASIS SB Draft RFI, L.5.3.1, page 81 | The OASIS SB Draft RFI requires that at least one (1) project must be for work performed under a cost-reimbursement contract type. Small businesses are Cost Accounting Standards (CAS) exempt per CFR 9903.201-1(b)(3) and are able to perform on non-fixed price contracts under FAR 16.104(h) which only requires CO approval of the contractor's accounting system. As such, many small businesses (particularly those who will qualify for Pool 1 and Pool 2) have not undergone DCAA, DCMA, etc. audits. For these reasons, I suggest the removal of the requirement of including one (1) project that was performed under a cost reimbursement contract type for Pool 1 and Pool 2. | |
| | | RESPONSE: We have changed the requirements in this area. Please see the changes blog. | |
| 41 | OASIS SB Draft RFI, L.5.5.1, page 82 | The draft RFI requires that written verification of audit by DCAA, DCMA, or a Federal Civilian Agency. Given that a contractor cannot request an audit by DCAA, DCMA, etc., would OASIS CO's request a pre-award audit by a cognizant audit board? Then, accept positive results as satisfaction of this requirement. Alternatively, I would suggest that this requirement be removed altogether or that audited financial returns be accepted in satisfaction of this requirement. | |
| | | RESPONSE: We have changed the requirements in this area. Please see the changes blog. | |
| 42 | OASIS SB Draft RFI, L.5.1.7, page 79 | This comment is provided to note that I support OASIS's requirement that Contracting Teaming Agreement (CTAs) must have been established in advance of this solicitation. Waiver of this requirement would effectively allow savvy contractors to subvert solicitation requirements that experience belong to the prime contractor. | |
| | | RESPONSE: Thank you for your feedback. | |
| 43 | L.5.5.1 - Pg 82 | Adequate Accounting System - If the offeror does not have audit verification of an adequate accounting system but is certain that its accounting system has been found adequate in accordance with FAR 16.301-3(a)(1), will GSA accept a letter from a cognizant audit representative verifying the adequacy of the contractor's accounting system. Most small businesses under the \$14mil threshold have adequate accounting systems that are just not DCAA verified either due to 48 CFR 9903.201-1 CAS exception for small businesses or have a monetary exemption for not receiving contracts subject to CAS totalling \$50 million or more in the cost accounting period. It would therefore be prejudiced to exclude small businesses from bidding on OASIS even if they have adequate accounting systems and controls. A similar approach has been used across other large acquisitions like NIH CIOSP3 SB and DHS EAGLE II and we recommend that GSA re-evaluate this requirement. | |
| | | RESPONSE: We have changed the requirements in this area. Please see the changes blog. | |
| 44 | L.5.3.1 - Pg 80 | Relevant Experience Minimum Requirements - The requirements for past performance especially for Pool 1 are discouraging. We don't think the government should mandate minimum award value or type of contract (T&M, Cost Reimbursement etc). Most small businesses start off small with the government by getting onto small programs and doing good work to get recognized for other award. For example, just because an award to the small business was less than \$500K does not mean the work was less valuable or critical than a contract worth \$2 mil. In addition, the restriction of 3/5 contracts to be with the Federal Government is unwarranted. We believe that most commercial best practices are slowly being adopted by the Government. So if at all, GSA is looking for contractors with innovative solutions and ideas then they should accept commercial past performances more openly than published. For example if a contractor has done logistics work for Fedex or UPS does not mean their logistics experience is second to work in the government. In fact it would be to the contrary. We therefore encourage GSA to revisit this criteria. | |
| | | RESPONSE: We have changed the requirements in this area. Please see the changes blog. | |

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| 45 | L.5.5.3/4/5 - Pg 83 | Is GSA being un-realistic by having a Pool 1 contractor have an Audited Estimating System , approved Forward Price Rate Agreements and an approved Purchasing System for \$14 million companies. Even though GSA states "if available" there are still points allocated for all these requirements. These systems cost a lot to own and maintain and quite frankly beyond the bounds of most companies in the \$14 million threshold. GSA should therefore provide a grading point system based on the level of the Pools rather than a "one size fits all" approach. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under advisement. | |
| 46 | L5.5.6/7/8 - Pg 84 | Most small business can afford to have Quality Certification for the organization. Getting appraised for a certification and its continuous implementation and recertification is an expense that a small business undertakes. However, expecting a \$14 mil company to show all three is would require signifcant expense. We therefore request GSA to change this to allow a contractor to show one of the certifications and assign points to the overall quality certification rather than all three individually. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under advisement. | |
| 47 | L.5.5.9 - Pg 85 | Earned Value Management System. - Small businesses are exempt for the whole EVMS life-cycle and are allowed to implement the 10 Core EVM reporting requirements and need not be audited. GSA should therefore look at a different approach for Pool1 and Pool 2 offerors, like an EVMS implementation plan to meet the Core EVM requirements. | |
| | | RESPONSE: Please provide a reference that indicates that small businesses are exempt from EVMS. If what you say is accurate, however, then no small business would have an EVMS and accordingly, the points associated with EVMS would be irrelevant in the evaluation of those Pools. | |
| 48 | F.3, p. 23 | Should read "with 1 (5-year) option..." | |
| | | RESPONSE: Thank you for the edit. | |
| 49 | H.3, p. 38 | End of first paragraph should read "...and, comply with the ordering procedures..." | |
| | | RESPONSE: Thank you for the edit. | |
| 50 | H.4.2, p. 40 | Second paragraph should read "...reporting system ensures in that the appropriate..." | |
| | | RESPONSE: Thank you for the edit. | |
| 51 | H.6.6 - H.6.9, p. 44-45 | Maintaining quality control and management control certifications can be costly. In the case of many small businesses, they are cost prohibitive (it is worth noting that the cost to acquire and maintain these "certifications" are often passed onto customers through higher rates and baked-in quality control measures in FFP tasking). Would the GSA consider some appropriate mix of certifications and incorporation of industry standard best practices as a realistic demonstration of infrastructure control and process maturity? | |
| | | RESPONSE: No. While we understand that certifications can be expensive, the objective of the evaluation system is to distinguish between Offerors. Those companies who have invested the time, money, and effort to obtain these certifications will be rated higher than those who have not. Furthermore, there is no way that we know of to objectively measure "best practices". What is considered "best" usually varies greatly from contractor to contractor, which is why we have placed more value on certifications. | |
| 52 | H.7.1, p. 48 | Second paragraph should read "Follow-up meetings may be held..." | |
| | | RESPONSE: Thank you for the edit. | |
| 53 | H.8, p. 50 | First paragraph, second sentence is a little confusing. Perhaps instead - "The contractor shall train Contractor personnel..." | |
| | | RESPONSE: Thank you for the edit. | |
| 54 | L.5.3.1, p. 81 | In our experience, it is very unusual for an IDIQ vehicle to issue a small business set-aside, cost-reimbursable task order. So, having a cost-reimbursement contract type under Relevant Experience as a pass/fail criterion is far too great an obstacle for small businesses. You will have very few proposals pass Acceptability Review. Please reconsider this as a pass/fail requirement. | |
| | | RESPONSE: We have changed the requirements in this area. Please see the changes blog. | |
| 55 | G.3.1 on page 30 | How, if any effect, would a CAF adjustment impact pre-adjustment Awards including all Options? Recommend adding "CAF adjustments will not effect previously awarded Task Orders". | |
| | | RESPONSE: Thank you for the recommendation. We will take it under advisement. | |
| 56 | L.4 on page 76 | font type and size shall (12) point Arial. Recommend allowing larger and smaller font in graphics, figures, and tables. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under advisement. | |
| 57 | L.5.3.1 on page 80 | Five (5) distinct projects, each as a Prime Contractor.... Recommend deleting this requirement as it precludes many Small Businesses from competition. Evaluation Criteria allows compnaies with more Prime Contracts to score higher. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under advisement. | |
| 58 | M.5 on page 94 | Annual values are very high for most Small Businesses in Pool 1. Evaluation Criteria will result in less competition in Pool 1. Recommend reducing dollar value for 50 pts to \$1M allowing the smaller businesses to score under criteria. | |
| | | RESPONSE: We have changed the requirements in this area. Please see the changes blog. | |
| 59 | M.5 on page 95 | COPM years experinece is high for Small Buisnesses. Recommend changing 10 years to 5 and 15 years to 10 to increase competition among Small Businesses. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under advisement. | |
| 60 | Section L.5.3.1 Relevant Experience Minimum Requirements | Will GSA consider lowering the threshold requirements for past performances, in particular the requirement that each relevant experience must include 4 out of the 6 core disciplines, and that projects have a minimum award value of at least \$5 million per year. Keeping the thresholds at these levels may unintentionally constrain the number of highly qualified mid-tier companies (those companies with annual revenues between \$10 million and \$1 billion) that can prime and potentially provide innovative solutions on OASIS. In many cases, mid-tier companies have greater capabilities than small businesses, and are highly motivated, less bureaucratic, and more agile than large businesses, but just as stable. In addition to increasing the diversity of industry partners, lowering these thresholds may have the added benefit of making OASIS attractive to a wider range of government agencies. | |
| | | RESPONSE: It is unlikely that we will lower the requirements on the OASIS solicitation as we feel that there is an ample supply of vendors (both "mid-sized" and "large") that will be able to meet these standards. | |
| 61 | Section L.5.3.1 Relevant Experience Minimum Requirements | Will GSA consider eliminating the requirement that at least one of the relevant experience projects include work performed under a cost-reimbursement contract type?. We believe this is unnecessary, since any accounting system certified by DCAA or DCMA must have the capability of tracking and reporting cost reimbursement contracts. | |

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| | | RESPONSE: We have changed the requirements in this area. Please see the changes blog. | |
| 62 | Section L.5.3.1 Relevant Experience Minimum Requirements | Will GSA consider allowing offerors to cite single or multiple award IDIQs or BPAs and describe task orders worked under those vehicles that demonstrate capabilities across the core disciplines and collectively exceed the dollar thresholds? This approach is similar to the one used for the Alliant proposals and demonstrates a strong IDIQ/BPA management capability. | |
| | | RESPONSE: No. We are focused on demonstrated experience in integrating core disciplines on single requirements. | |
| 63 | Section M.5 Scoring System | Will GSA consider lowering the thresholds to receive points in the OASIS scoring system? Keeping the thresholds so high will reduce competition and constrain the number of highly qualified mid-tier companies that could otherwise prime on the OASIS Master contract and result in only very large firms receiving awards. | |
| | | RESPONSE: No. Lowering the point thresholds does absolutely nothing to change the Top rated Offerors. This is similar to giving points for minimum requirements, if everyone gets them, they are not worthwhile segregators. | |
| 64 | Section L.3, Instructions; page 75 | Section L.3 states, "GSA will consider affiliates, internal divisions, and subsidiaries of an Offeror, only if the Parent Company is the official legal bidding entity on the SF33. For example, ABC Enterprises submits a proposal for an OASIS contract. The proposal identifies relevant experience by ABC Company, a wholly-owned subsidiary of ABC Enterprises. This would be acceptable. However, if ABC Company, a wholly-owned subsidiary of ABC Enterprises submitted a proposal for an OASIS contract and identified relevant experience by ABC Enterprises, that would not be acceptable and the proposal would be rejected." This offeror requests the Government to refine this section to allow past performance and experience from all company affiliates, provided that a firm can demonstrate an organizational structure in which the personnel performing the highlighted work can and will be made available to perform under the OASIS contract... | |
| | | RESPONSE: We have changed the requirements in this area. Please see the changes blog. | |
| 65 | L | To ease readability, we recommend that font size within graphics be 8 pt Arial or 9 pt Arial Narrow. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under advisement. | |
| 66 | L | The RFP states: Using the relevant experience template in accordance with the instructions in Section L.5.3.2., the Offeror must demonstrate Five (5) distinct projects, each as a Prime Contractor or (Existing CTA in accordance with Section L.5.1.7 only)." Small businesses may certainly have contracts that meet the requirements specified in Section 5.3.1, however it is highly unlikely that a small business has five prime contracts that meet the requirements. We believe this requirement will severely limit the number of companies that can submit a bid for GSA OASIS. Respectfully request the Government reduce the total required references for small businesses to no more than 3 or, alternatively, remove the requirement for the scope of the contract to include three out of six Core Disciplines. | |
| | | RESPONSE: We have changed the requirements in this area. Please see the changes blog. | |
| 67 | L | The RFP states that the SB offeror must provide references that "2. Involve the performance and/or integration of at least Three (3) out of the Six (6) OASIS SB Core Disciplines. The OASIS SB Core Disciplines are described in Section C and include Program Management Services, Management Consulting Services, Scientific Services, Engineering Services, Logistics Services, and Financial Management Services." It is highly unlikely that a small business has five prime contracts that meet the requirements. We believe this requirement will severely limit the number of companies that can submit a bid for GSA OASIS. Respectfully request the Government remove the requirement for the scope of the contract to include three out of six Core Disciplines | |
| | | RESPONSE: Thank you for the recommendation. We will take it under advisement. | |
| 68 | Attachment J2 | The RFP states that the SB offeror must provide references that "3. Have a total award value of at least \$2 Million Per Year". Many small businesses have one contract that satisfies this requirement. However, it is very uncommon to have multiple contracts as a prime contractor that satisfies this size standard in addition to the specific scope and recency. The combined value of the five references, plus the additional amount of business that they may be performing on would mean that many small businesses would not meet this specific size standard, whereas if the amount was lowered to \$1M, GSA would foster more competition with a larger pool of small businesses. Therefore, Respectfully request the Government reduce the required annual value to no more than \$1 Million Per Year. | |
| | | RESPONSE: We have changed the requirements in this area. Please see the changes blog. | |
| 69 | Section B.2.1; Page 11 and Section J.1, Attachment 1 | It is common practice in commercial and Government contracts to allow years of experience to be substituted for education, allowing the most qualified personnel to perform a service. It is suggested that the Government include a substitution of years of experience for education allowance and state the substitution criteria. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under advisement. | |
| 70 | Section G.2.6; Page 30 | The last sentence of G.2.6 states, "All costs associated with the COPM and COCM shall be at no direct cost to the Government." Some contractors have DCAA disclosure statements that require those contractors to charge these costs directly instead of indirectly as this section implies. The current version of the RFI could possibly put these contractors in violation of their disclosure statements. We suggest that the RFP allow contractors to negotiate this allowable cost in task order proposals, in accordance with their disclosed practices | |
| | | RESPONSE: Thank you for the recommendation. We will take it under advisement. | |
| 71 | Section H.6.4 Forward Pricing Rate Agreements and Approved Billing Rates, Page 44 | Contractors who do not do exclusive work with DOD normally do not have an FPRA. These contractors would submit Forward Pricing Indirect Rate proposals to the DCAA and DCMA. After review, if DCAA or DCMA has a concern about the proposed indirect rate, the contractor is notified. Otherwise the submitted Forward Pricing Rates (FPRs) are used by the contractor for proposals. When requested for verification, DCAA concurs with the submitted rates to the requesting agency. Please revise this section to permit the use of FPRs submitted to DCAA with supporting documentation providing GSA with a copy of the FPR submission. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under advisement. | |

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| 72 | L.5.4.2 PAST Performance, page 86 - 87 | Reference L.4.2 Past Performance, specifically: "CAUTION, At least three (3) out of five (5) past performance projects must be for work that was for the Federal Government under a contract or task order awarded by the Federal Government..." Challenge: The DRFP is restrictive by excluding firms from award consideration that have not worked with the US federal government. Support: Per Jim Ghiloni in a meeting on April 10, 2013, past performance will be a primary indicator of the ability of a contractor to perform the work outlined in OASIS. What better experience is there than from firms supporting commercial clients or public service institutions other than the US federal government? These organizations have collectively contracted for OASIS-similar professional services on an order of magnitude hundreds of times more than contracts seeking professional services offered by the US federal government. This experience is invaluable as many functions performed by the federal government are also performed by commercial firms and other governmental organizations. No doubt the US federal government is different and managing a contract for the federal government is different, but one should not categorically believe a firm having not worked with the US federal government before cannot successfully perform work in the federal environment. If this statement were taken literally, there would be no firms supporting the federal government today as each of today's federal contractors had at one time no federal government experience. If GSA is to evaluate an organization's ability to work with the federal government, let them fairly and correctly evaluate the bidder under Volumes 1, 2, 3, 5 and 6. | |
| | | RESPONSE: While we understand the rationale of this suggestion, we disagree with the value/importance of having experience working for and dealing with the Federal Government. Government contracting is a world apart from commercial business practice. Terms and conditions, regulations, clause interpretation, disclosure, etc, etc, etc. As we have stated many times over, OASIS and OASIS SB are looking for proven entities. Accordingly, these contracts should not be a company's first attempt at Federal Government contracting. Other vehicles like the GSA Schedules program are more appropriate for that. Of course, a company could go get that experience with the Federal Government and be considered for an on-ramp at a future date. | |
| 73 | L.5.5.1 Adequate Accounting System, page 87 | Reference L.5.5.1 Adequate Accounting System, page 87, specifically, "To be eligible for award, the Offeror must [have] an accounting system that has been audited and determined adequate for the accumulation and reporting of costs." In short, bidders must be able to perform cost plus contract type task orders. Challenge: The DRFP is restrictive by excluding firms from award consideration which cannot execute against cost plus contract types. Support: Per Jim Ghiloni on April 10, 2013, GSA estimates that 50 percent of likely OASIS work will not be cost plus contract types. Further, the Administration has openly stated that fixed price contract types are preferred over cost plus contract types. Firms that can perform fixed price contract types and other types other than cost plus, should not be excluded from contract awards. Per the DRFP, GSA has made it clear in Section H.13 Off-Ramping, that it will off-ramp contractors that have no active task orders under OASIS. GSA should use this criteria, the language detailed in the DRFP, to exclude organizations from performing on OASIS rather than excluding from contract award organizations that have proven successful performing on contract types making up at least 50 percent of total estimated task orders. | |
| | | RESPONSE: Adequate Accounting Systems are a requirement of the Federal Government for contracts that allow cost reimbursable contracting. This has been defended successfully in court. We have relaxed the minimum requirements regarding accounting systems, but they are still required and will stay required. | |
| 74 | B.1 Background, page 10 and C.2.1 SOW, Core Disciplines, page 17 | Reference Section B.1 Background, page 10, which states "services ...are intended to meet the professional service mission requirements." Further, Section C – Description/Specification/Statement of Work, specifically C.2.1 Core Disciplines, page 17, which include Program Management, Management Consulting, Scientific, Engineering, Logistics and Financial. Challenge: The DRFP statement of work mixes professional services with business areas, confusing the scope of the full array of professional services that could be performed under the OASIS contract. Support: Professional services such as program management and management consulting represent a partial list of a wide range of services that could support the improvement of government business operations in such business areas as Scientific, Engineering, Logistics and Financial performed by the US federal government. The government should include additional professional services in the SOW to provide requesting government organizations a wider range of professional service offerings that will be needed to address the myriad of challenges facing the government today. These services include, but are not limited to Operations Management, Organizational Behavior, Stakeholder Management and Change Management. | |
| | | RESPONSE: We feel this depends on the vocabulary and structure a company is used to, but please feel free to provide specific, suggested edits to the draft documents and we will certainly consider them. | |
| 75 | Section L.3, Page 75 | Section L.3 as written overly restricts the ability companies with capabilities highly responsive to OASIS from bringing their full, integrated capability set to the OASIS offer. As has been identified by other questioners, such industry-leading corporations may be comprised of multiple legal entities for business, tax, and other reasons. We fully understand and respect GSA's desire to ensure that those attributes of the Offeror that were scored during the evaluation will be brought to bear during performance. This relates to both experience/past performance as well as certifications. | |
| | L.3. INSTRUCTIONS | We understand that GSA is revisiting the language in L.3 and respectfully suggest that GSA leverage the Alliant model permitting the aggregation of affiliates' past performance as long as the Offeror can establish a meaningful relationship with the specific affiliate that is bidding. Similarly, the desired certifications for performance excellence should be focused not on the legal bidding entity but the part of the affiliated organization that will be delivering services under OASIS. The description of the meaningful relationship should identify the certifications that the affiliate will bring to bear during performance on OASIS thus providing GSA with an assurance that the certifications are not hollow accolades without any actual applicability to OASIS performance. The Program Manager and the Contracts Manager would be required to be employees of the bidding legal entity. In these roles, they would be responsible for ensuring that the affiliate commitments are being fulfilled and that the Offeror's affiliates were participating meaningfully in performance. To ensure this to be the case, GSA could require Offerors to provide quarterly or annual reports on the extent of actual participation by the affiliates on the OASIS effort. Review of actual performance versus that represented in the offer could be a factor for GSA to consider in exercising OASIS options. We offer that the following language that would seem to meet both GSA's and your industry partners' objectives: | |
| | | L.3. INSTRUCTIONS | |

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| | | GSA is only accepting proposal submissions that represent the Prime Contractor only , except for existing Contractor Team Arrangements (CTAs) in accordance with Section L.5.1.7. GSA will consider the Experience, Past Performance and Systems, Certifications, and Resources of affiliates, internal divisions, and subsidiaries of an Offeror, only if the legal bidding entity on the SF 33 provides substantiation that there is a "meaningful relationship" between the affiliate, division and/or subsidiary of the Offeror for purposes of performance under OASIS. | |
| | | NOTE: To establish a meaningful relationship, the Offeror shall provide the Government, as required under Sections L.5.3 (VOLUME 3 – Relevant Experience) and L.5.5. (VOLUME 5 – Systems, Certifications, and Resources), a "commitment letter" from the affiliate, division or subsidiary of the Offeror. The commitment letter must demonstrate the specific nature of the "meaningful relationship," the resources that the affiliate, division or subsidiary of the Offeror will devote to OASIS, and the applicability of any cited Systems and Certifications to performance under OASIS. If the above-referenced conditions are not met, the Government may determine that the Experience, Past Performance, Systems, Certifications, and Resources information submitted for the Offeror's affiliates, subsidiaries, and/or division is not relevant for the Government's evaluation of the Offeror's Experience, Past Performance, Systems, Certifications, and Resources. | |
| | | RESPONSE: We have changed the requirements in this area. Please see the changes blog. | |
| 76 | Section L.5.5.1 Adequate Accounting System/ Section M.4.5.1 Adequate Accounting System Pass/Fail evaluation | Due to the considerable backlog of DCAA Cost Accounting System reviews and the increased time for a final audit report to be finished and negotiated, we request that the government consider allowing the submission of an outside Public Independent (i.e., PwC, KPMG, Ernst and Young, Deloitte) adequate accounting system certification/report. These independent audit reports mirror DCAA SF 1408 criteria for adequacy. This 3 rd party solution allows the contractors to receive an independent accounting system and CAS adequacy review. Additional options include: • The Government consider revising the language in section L.5.5.1 to include: "If an Offeror does not have audit verification of an adequate accounting system to submit, but is certain its accounting system has been determined adequate in accordance with FAR 16.301-3(a)(1), GSA will contact the cognizant auditing representative office that was provided to verify." • Employing other provisions / authority the PCO may have at his/her disposal to grant an award without having a copy of the report from the cognizant DCAA office stating that the offeror's accounting system is adequate at the time of award." | |
| | | RESPONSE: We have changed the requirements in this area. Please see the changes blog. | |
| 77 | H.6.5 Approved Purchasing System/L.5.5.5 Approved Purchasing System/M.5 Scoring System | In the Unrestricted Draft RFI, contractors are encouraged to have an approved purchasing system but are not required to have an approved purchasing system. The number of points being awarded in Section M.5 for an approved purchasing system appears to be non-proportional to the points awarded for other systems detailed in Section M. Section M allows 500 Points for having an approved purchasing system (a non mandatory system) and we believe that this is weighted too high as it equals 31% of total scoring for that section. The points currently available unnecessarily penalize contractors that have not been able to schedule and complete their DCMA contractor purchasing system review (CPSR). DCMA has a back log of 12+ months for current approval and review of the contractor's systems. Contractors cannot control scheduling or completion of the scheduled CPSR and must rely upon of the DCMA. We understand the importance of having a purchasing system, but believe GSA should reduce the number of points and still show the importance of this system. We are requesting that the government consider reducing the number of points from 500 to 150. We believe this will be an equitable adjustment for those companies that are currently undergoing a CPSR or are expecting a review in the next 6 months to one year. | |
| | | RESPONSE: An approved purchasing system is very important to our clients and is weighted accordingly. Approved purchasing systems save our client OCOs a tremendous amount of time and effort. If companies are in line to receive one, then an on-ramp could be done once that happens if the point difference that would cause would be sufficient to be considered. | |
| 78 | Core Disciplines (Section C.2.1 Core Disciplines page 17) and relation to NAICS Pools (Section M.2. Basis of Award page 95) | In the Draft RFI it is unclear what the correlation is between the 6 Core Disciplines addressed in the Relevant Experience and past Performance and the 6 NAICS Pools which will be used for award purposes. Currently contractors will be providing Relevant Experience and Past Performance based on the 6 core disciplines. There does not appear to be a strong correlation in the RFI between what the contractor is proposing and what the Basis of Award criteria are to receive an award in specific NAICS-based Pools. The RFI details that 5200 points of the total 6800 are to be scored on Relevant Experience and Past Performance (see M.5 Scoring System). Both Relevant Experience and Past Performance are based on the offerors demonstrated expertise in integrating the 6 core disciplines and there is no linkage between the core disciplines and the NAICS pools. We request that the NAICS Pools be removed from the contract. If removal is not an option, can GSA provide clarification on the nexus between the 6 core disciplines and the NAICS Pools to improve the contractor community's understanding of this requirement? | |
| | | RESPONSE: There is no correlation between the Core Disciplines and the Pools. The core disciplines are universal to all Pools. The Pools are based simply on Size Standards and have been included in response to the pending rule changes by SBA to ensure that the size standard applicable to a task order is the actual size standard used in determining what is a small business and what is a large business. | |
| 79 | L.5.5.9, p. 90; M. 5, p. 101 | Recommend removing EVMS from the scoring criteria. EVMS will be specified at the task order level if needed. This is not a typical requirement of professional services contracts. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 80 | B.1. , p.10 | Recommend adding National Security Community to specifically call out a set of Federal agencies that would be incentivized to use OASIS: The services to be provided under the OASIS master contract are intended to meet the professional service mission requirements of all Federal agencies, including Civil, Department of Defense (DoD), and National Security Community agencies. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 81 | Page 17 Figure | Consider adding "Deployment" to "Implementation" and adding "Retirement" to "Operations and Maintenance." | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 82 | C.2.1.2. , p.18 | Consider adding Strategic Planning and Strategic Forecasting to fill out the examples list. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 83 | C.2.1.4 , pp. 18-19 | Consider adding Mission Assurance and Data Analytics to fill out the examples list. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |

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| 84 | H.7.4, p. 50. | Current wording implies active GSA intervention on corporate websites. Suggest rewrite: "GSA reserves the right to approve marketing, promotional materials, or news releases by a Contractor that is OASIS related, including information on the Contractor's OASIS webpage." | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 85 | M.5. SCORING SYSTEM, L.5.5.8 | Recommend CMMI Level 5 be awarded 300 points. It is a significant achievement to attain Level 5. CMMI Level 5 clearly distinguishes the Best of the Best. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 86 | L.5.4.3., p. 87; M. 5, p. 101 | For companies that work primarily with the National Security Community and on Cost Reimbursable Contracts, small business subcontracting reporting is not required through eSRS and therefore not done. Small business contracting is reported directly to the customer using Standard Form 294, when required. Recommend adding an allowance to submit a customer-signed Standard Form 294 as an alternative to eSRS data. This approach is comparable to the allowance for alternative submission for CPAR data. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 87 | Solicitation, B.2.1. Labor Categories and Standard Occupational Classifications, pg 11/96 and Attachment J.1, Attachment (1) OASIS SB Labor Categories, Business and Financial Operations Specialists Group 2, pg 4/13 | The SOC category Logisticians (13-1081) is included in this group. While Logisticians may "have similar salaries based upon the BLS data" to the other SOC categories listed in this group, the type of work performed is not consistent with the other categories. The other categories are predominately "desk jobs" in which incumbents perform processing of claims and other paper or automated documents. Logisticians (based on the description) provided are more likely to perform physical labor for which workers' compensation rates are significantly higher along with other related private industry insurance and equipment costs to provide these services. Salary should not be the only basis upon which jobs are combined within labor categories. The other costs incurred by industry for providing the described services should be factored in when providing a list of labor categories against which industry will provide rates, especially for labor hour and T&M rate proposals. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 88 | Solicitation, B.2.1. Labor Categories and Standard Occupational Classifications, pg 11/96 and Attachment J.1, Attachment (1) OASIS SB Labor Categories, Business and Financial Operations Specialists Group 3, pg 5/13 | The SOC categories related to Human Resources (13-1078 and 13-1141) and Training (13-1151) appear to be out of place in this Group. These HR categories, especially when expertise is required in federal government HR and labor practices, is very specialized and is typically more expensive to procure. Similar concerns apply to the training categories. Development of training curricula, products and systems for many federal agencies, especially DoD, require expertise not required for training staff in private industry. While we understand the desire to limit the number of labor categories on the contract vehicle to manageable number, given that the salary information reported by BLS is related to private industry requirements, recommend these categories get separated from the Business and Financial Operations Specialists and provided with their own Group. As collected, the requirements are too broad for industry to reasonably ascertain/predict a single rate structure. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 89 | Solicitation, B.2.1. Labor Categories and Standard Occupational Classifications, pg 11/96 and Attachment J.1, Attachment (1) OASIS SB Labor Categories, Business and Financial Operations Specialists Group 4, pg 5/13 | The SOC categories collected in Group 4 are broadly varying and, at least for 13-1032, bears no resemblance to something reasonably expected to be procured on task orders under this contract vehicle. This applies to some of the SOC categories in other Groups/Labor Categories as well. If these categories were put together merely to represent a level of salary GSA anticipates would be appropriate for a specific Group, recommend an alternative approach for proposal purposes only which uses references to federal wage grade equivalents for each Group/Labor Category. This approach communicates the expected experience, education and compensation level while not incorporating confusing and possibly irrelevant references to unrelated SOC categories. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 90 | Solicitation, F.4.1. Deliverable and Reporting Requirements, G.3.4.1. OASIS SB Contractor Performance Assessment Reporting System (CPARS), pg 24/96 | Should the "Frequency" of this deliverable be related to the publication of the CPARS report by the CO versus a specific number of days following the end of the reporting period? The contractor has no control over when the CPARS report is published and can't respond to the report until it is published/provided by the CO. The language in G.3.4.1 refers to 30 days after receipt of the CO prepared CPARS not to 30 days following the end of the reporting period. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 91 | Solicitation, F.4.2. Compliances, G.3.4 Contractor Performance Assessment Reporting System (CPARS) and CPARS Reporting, pg 26/96 | Should the "Frequency" of this compliance item be related to the publication of the CPARS report by the CO versus a specific number of days following the end of the reporting period? The contractor has no control over when the CPARS report is published and can't respond to the report until it is published/provided by the CO. The language in G.3.4.1 refers to 30 days after receipt of the CO prepared CPARS not to 30 days following the end of the reporting period. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 92 | Solicitation, G.3 Contract Administration Requirements, G.3.12. Option Determination, pg 36/96 | There referenced section states: "The option determination for each Contractor will be based on...attaining a minimum of 3 task order awards." The contractor has no control over award to task orders. While unlikely, an OASIS SB prime contractor could bid on every TO RFP/Q issued and still not be awarded 3 task orders. Recommend the use of some standard over which the contractor has control. Penalizing a contractor for not being awarded task orders, despite active participation in the contract, is neither fair nor necessarily in the best interest of GSA's customers. | |
| | | RESPONSE: If a Contractor has been active, but unsuccessful, we will take that into consideration and examine all performance considerations in the decision to exercise an option, so it's not "firm" that not winning three task orders would disqualify you from getting your option exercised. However, the flip side to this is that we feel winning 3 task orders over a 5 year period is not a tremendous burden. We expect OASIS SB contractors to be successful in capturing business. We expect OASIS SB contractors to bring their in-scope work to the OASIS SB contract over this initial 5 year period. We will attempt to assist all OASIS SB contractors in being successful. | |

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| 93 | Solicitation, M.3 Screening and Evaluation Process, pg 90/96 and Solicitation, H.3.1 Ordering Procedures, H.3.1 Set-Asides Based on Socio-Economic Group, pg 39/96 | While both GSA and the potential awardees would hope that there will be more than 3 awardees in each socio-economic group using the system described in M.3, for assessing the set-aside policy under OASIS SB one must assume there will be only 3 in one or more of the categories. If that is true and the threshold for a set-aside is 3 companies as stated in H.3.1 then no set-asides would ever occur under OASIS SB for that socio-economic category. Given that the SBA standard for all but FSS contracts is TWO qualified companies and given a reasonable assumption that in one or more socio-economic categories under OASIS SB there will be only 3 qualified awardees, request that GSA modify the requirement for a set-aside to be only 2 qualified awardees. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 94 | Solicitation, L.4 Proposal Format , L.5.1.4, pg 76/96 | Request that the supporting information required in the Professional Employee Compensation Plan ("Supporting information shall include supporting rationale, such as recognized national and regional compensation surveys or studies of professional, public and private organizations, used in establishing the total compensation structure.") be excluded from the page limitation (5 pages) and the font limitations (font type and size shall (12) point Arial). Given the large number of labor categories to be evaluated and priced, the compensation survey/study data alone will exceed the page limitation. In addition, supporting material will likely be reproductions of published reports so the bidder will have no control over font size/type. | |
| | | RESPONSE: We will be editing the language to remove page limits for these items. | |
| 95 | F.4 PERFORMANCE STANDARDS, Page 23; F.4.2 Compliances, Page 16; Section H.6 SYSTEMS, COMPLIANCES, AND CERTIFICATIONS, Page 42; L.5.5.3 through L.5.5.10, Pages 88-90 | Section F.4 states -"Failure to meet any one of the following deliverables, reports, or compliance standards may result in Dormant Status and/or result in a Contractor being Off-Ramped. Section F.4.2 Compliances states - "The following table contains compliances required for OASIS". Additionally, for every reference and compliance, it states that the Contractor "shall" maintain, if applicable. Section H.6 states - The adequacy of the Contractor's accounting system is mandatory throughout the period of performance of OASIS. All other Systems, Compliances, and Certifications must be maintained at the Contractor's current level at time of award or higher throughout the period of OASIS. Section L.5.3 through L.5.5.10 states - "if available", Contractor must provide the applicable System and Certification. In order to be clear, it is recommended that identical language be included in all sections related to Systems, Compliances and Certifications that states: "Adequate Accounting Systems are mandatory for all companies bidding OASIS. Cost Accounting Standards (CAS) are mandatory; UNLESS covered by exemption under 48 CR 9903.201-1 and 48 CFR 9903.201-2. All other systems and certifications are optional. Contractors are, however, encouraged to have these systems and certifications. | |
| | | RESPONSE: We will be editing the language here to clarify. | |
| 96 | G.3.1 Contract Access Fee (CAF), Page 31 | This section states, "Total CAF Remittance is calculated as follows: Total Paid Invoice(s) multiplied by the CAF Percentage. On all task order solicitations, regardless of contract type, the Contractor shall include CAF in their cost pricing proposals. The Contractor may be required to identify the CAF as a separate line item in their proposal and the task order award may identify the CAF as a separate Contract Line Item Number (CLIN)." We would like to suggest that for consistency and transparency, all task order proposals and awards should identify the CAF as a separate Contract Line Item regardless of the contract type. By mandating that the CAF be proposed and billed as a separate CLIN, the Contractors would use a single CAF calculation formula and both the Contractor and the Government would be able to easily identify and track the CAF. This section would read, "The CAF Remittance is calculated as follows: CAF= (Total Invoiced amount - CAF CLIN) * CAF Percentage. On all task order solicitations, regardless of contract type, the Contractor shall include CAF in their cost pricing proposals. The Contractor is required to identify the CAF as a separate line item in their proposal and the task order award must identify the CAF as a separate Contract Line Item Number (CLIN)." If it is not an option to mandate that all task orders identify the CAF as a separate CLIN, we ask that the contract provide two CAF formulas that should be used when calculating the CAF payments. One formula that applies to orders in which the CAF is embedded in the rate and one formula that applies to orders in which the CAF is billed as a separate CLIN. The contract should state, "When calculating the CAF for orders in which the CAF is embedded in the rate the following formula applies: CAF= Amount of Invoice*(0.0075/1.0075). When calculating CAF for orders in which the CAF is billed as a separate line item the following formula applies: CAF= (Total Invoiced amount - CAF CLIN) * CAF Percentage. | |
| | | RESPONSE: Thank you for the recommendation. We are examining this issue currently. | |
| 97 | G.3.2.1 (16) and (17) Task Order Award Data, Page 32 | Respectfully request the requirement to provide the complete task order awarded by the OCO and complete task order solicitation issued by the OCO be provided to GSA by the OCO. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 98 | G.3.2.2 Task Order Modification Data, Page 32 | RFP states, "The Contractor shall report all task order modification data within 30 calendar days of the modification, excluding modifications issued through the GSA AAS Business System Portal." Can you please clarify if the modification data should be entered within 30 days of receipt of modification from the customer or within 30 days of the modification being fully executed? We would suggest that this section be changed to read, "The Contractor shall report all task order modification data within 30 calendar days of the modification being fully executed, excluding modifications issued through the GSA AAS Business System Portal." | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 99 | G.3.2.3(5) Invoice Data , Page 33 | "Total Amount Paid (Lump Sum) for Fixed-Price, T&M or L-H type task orders only or, Labor Categories, SOC Number, and Direct Labor Rate for each Contractor employee performing on a Cost-Reimbursement task order only." It is not clear what level of reporting is required for each task order type. Suggest each task order type have its own line. For example 5.a Fixed-price orders total amount paid; 5.b T&M or L-H task orders ...5.c Cost-Reimbursement task orders. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 100 | H.9.3 Conflicts of Interest, Page 51 | Request that GSA require all OCOs to make it clear in each RFP if an OCI or potential OCI will occur as a result of being awarded a task order. This is especially important since Advisory and Assistance Services might be procured under OASIS. | |
| | | RESPONSE: That is part of our OCO training and will be included in the OASIS contracts ordering guides. | |
| 101 | I.4.7 GSAR 52.232-99 Providing Accelerated Payment to Small Business Subcontractors, Page 61 | Respectfully request GSAR 52.232-99 be removed from the solicitation, since DoD has suspended implementing this clause due to the sequester. | |

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| | | RESPONSE: OCOs will have the authority to remove the clause if not applicable for their respective agency. | |
| 102 | J.1 OASIS LABOR CATEGORIES, Page 1 | RFP states, "Contractors may deviate from the definitions above when responding to task order solicitations so long as the deviations are clearly identified in their task order proposal." Commercial best practices allow for education/experience substitutions to allow for flexibility in staffing a job. Experience, education, and description of duties for the service categories are only guidelines to the typical background for staff to be provided under individual task orders. Each task order opportunity is reviewed to determine the best candidate available, while considering all aspects of the work requirements. As a best practice, we respectfully request the following education/experience substitution table be included for all OASIS labor categories: | |
| Degree | Related Work Experience | Related Degree and Experience Substitution | |
| Associate's | 2 years work experience may be substituted for an Associate's Degree | 2 years work experience may be substituted for an Associate's Degree | |
| Bachelor's | 4 years work experience may be substituted for an Bachelor's Degree | Associate's Degree plus 2 years work experience may be substituted for a Bachelor's Degree | |
| Master's | 6 years work experience may be substituted for an Master's Degree | Bachelor's Degree plus 2 years work experience may be substituted for a Master's Degree | |
| Doctorate's | 10 years work experience may be substituted for a Doctorate's Degree | Bachelor's Degree plus 6 years work experience, or a Master's Degree plus 4 years work experience may be substituted for a Doctorate's Degree | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 103 | L.3 INSTRUCTIONS, page 76 | "Offerors are hereby instructed to register in the AAS Business Systems Portal at least one month prior to submitting proposal documents." Contractors will need to review the final language on bidding entity in the final RFP to determine which entity to bid. Once the bidding entity is determined, the AAS Business Systems Portal account can be created (if needed) to meet the 30 day pre-submission requirement. Request the proposal response time be 45 days to accommodate this requirement. | |
| | | RESPONSE: We plan to issue an updated draft document that presents the changes we have stated that we will make. We feel this should provide sufficient time for your concerns to be addressed. The 30 day requirement is actually more of a suggestion to ensure there are no last minute complications with submitting proposal information. | |
| 104 | Section C.2.1, Pages 17 - 21 and Section H.4.2.1, Pages 40 - 42 | Many small businesses offer specific and deliberate services based on their core competencies, such as a focus on engineering or scientific research as a core service offering. Not all small businesses can demonstrate coverage across all of the Core Disciplines listed in Section C.2.1 without partnering with another small or large business. GSA states that it created the "Pools" under OASIS and OASIS SB solely to establish size standards. Would GSA reconsider its Pool structure to align with the Core Disciplines with an accompanying or average size standard for small businesses? We recommend that GSA create a different pool for each Core Discipline with NAICS codes and size standards commiserate with the historical work effort. This would promote the following benefits to GSA: 1) Stimulate competition and acquisition of the "best and brightest" within a specific discipline, 2) Create parity when assessing past performance and relevant experience within a core discipline, 3) Enable the application of specific certifications by pool, e.g. ISO9001 is relevant for engineering, but not necessarily relevant for management consulting or financial services, 4) Promote contractor usage and referral of existing clients to the OASIS SB contract, and 5) Direct requirements to OASIS Unrestricted versus OASIS SB based upon requirement complexity and need, i.e., a client with a \$5B program management requirement with CMMI Level 3 and ISO9001 certifications should not be directed to a small business under the \$14M threshold. | |
| | | RESPONSE: One of the key components of OASIS SB is integration. Accordingly, we don't feel that it makes sense to establish functional areas based on core disciplines for a contract designed for integration of those core disciplines. We feel confident that we will find ample competition amongst small businesses who have experience delivering integrated solutions to clients. | |
| 105 | Section J.4, pages 4, 5, 6, 7, and 8 | Item 2 requires each project to exceed at least \$2M per year in total award value or the offeror is ineligible for an award. We request that GSA consider lowering this requirement to \$1.5M for SB Pools 1 and 2 in light of the various contract reduction initiatives across the Federal Government related to Professional and Management Services. That is, in July 2009, the Office of Management and Budget (OMB) instructed agencies to reduce contract spending on management support services by 15% by the end of fiscal year 2012. This initiative became the predecessor to OMB's acquisition savings and high-risk contract reduction initiative. In November 2011, OMB issued a memorandum to the chief financial officers, chief acquisition officers, and senior procurement executives of federal agencies outlining the steps that should be taken to ensure that the goals for spending reductions on management support services are clear, and the methodologies used to determine baseline spending data and savings are consistent and measurable. Since 2009, we have experienced reductions in our contract values by as much as 30% based upon these directives. Additionally, with size standards of \$14M and \$19M for Pools 1 and 2, it is nearly impossible for Small Businesses to have five Past Performance Projects of that value using the definition of each Task Order within a BPA or IDIQ being a separate Project and also to stay within the size standard. We believe the \$2M Relevant Experience requirement and definition of a Project would not provide a sufficient pool of contractors to compete for the 40 spots within Pools 1 and 2 of OASIS SB. | |
| | | RESPONSE: We have changed the requirements in this area. Please see the changes blog. | |

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| 106 | Section L.5.3.1, Page 81, item 5 | Our experience over the past two to three years is that the federal government has been required to utilize more Firm Fixed Price (FFP) contracts. As such, we have seen less Cost Reimbursable (CR) contracts for Small Businesses. As an example, we are a Prime on a Large Task Order based IDIQ that can have FFP, T&M, and CR type contracts. We were required to have our accounting system audited by DCAA for proper segregation, identification, accumulation, and allocation for direct and indirect costs. Although we have won a Task Order on this IDIQ and have a DCAA approved and audited Accounting System, our Task Order is FFP. When have proven that our systems and processes are in place for managing CR contracts. We also know that there are many other Small Businesses in the same situation as us. Thus, we suggest that GSA eliminate the requirement to have one of the five Past Performances be performed under a Cost-Reimbursement contract type, as this would severely limit the contractors available to compete for the 40 spots within Pools 1 and 2 of OASIS SB and may not provide enough respondents to reach that metric. | |
| | | RESPONSE: We have changed the requirements in this area. Please see the changes blog. | |
| 107 | Section L.5.3.1, Pages 80-82 | Since most Small Businesses start by obtaining subcontract work from larger organizations, much of the revenue for organizations in Small Business Pools 1 and 2 comes from subcontract revenue. Much of the time, this due to the Small Business not having their own contract vehicle for the federal government to utilize, but almost the entire work is completed by the small business. We suggest that the government allow 1 out of the 5 past performances to be subcontract work, still utilizing the definition of Past Performances being individual Task Orders within a BPA or IDIQ and abiding by all other requirements of that section. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 108 | Section L.5.5.8 CMMI Maturity Level, Pages 84-85 | Since OASIS and OASIS SB are non Information Technology (IT) contracts, the additional points for CMMI certification provides an unfair advantage to contractors who are focused on Engineering and IT Development. It's an unnecessary and a very costly requirement for professional services firms that concentrate on three of the Core Disciplines required under OASIS; Program Management Services, Management Consulting Services, and Financial Management Services. Leaving this evaluation criteria and extra points within the solicitation would sway the evaluators to those firms that are more focused on Engineering and Development, leaving a much smaller pool of firms that provide Program Management, Management Consulting, and Financial Management Services. GSA would not have the best of breed contractors within those three core disciplines. | |
| | | RESPONSE: While CMMI started in software development, it is not limited to that field and has evolved toward process improvement applicable to all service providers. | |
| 109 | Section M.5, Pages 89-96 | Many professional services companies, especially small businesses, have not been required to apply CMMI, ISO 9001, and AS9100, EVMS, and Facility Clearance Level certifications as the nature of our work is neither 1) systems development or integration related, 2) applicable to civilian agency security requirements (e.g., FCL), or 3) large enough to warrant the application of EVMS requirements. Additionally, EVMS has typically not been used within a few of the Core Disciplines of OASIS including Management Consulting and Financial Management Services. Providing extra points for EVMS systems will reduce the pool of firms with expertise in Management Consulting and Financial Management Services. Would GSA consider applying these extra points by pool or size standard (e.g., Pools 3 and above) or eliminate this from the scoring? For example, the IRS determined that the application of CMMI and EVMS certifications would be cost prohibitive to small businesses providing non-application development services and therefore limit competition on the TIPSS-4 contract vehicle. For this reason, only CMMI and EVMS requirements were applied to the unrestricted portion of the TIPSS-4 contract for large businesses and the restricted portion for Cybersecurity. | |
| | | RESPONSE: The only system or certification required for OASIS SB awards is an acceptable accounting system. Beyond that, points are awarded to those who have these various systems and certifications. If no small businesses have these systems or certifications, then it does not matter if points exist for them because nobody would get those points and the evaluation would come down to the other things in the scoring matrix like past performance and relevant experience. However, we feel that some small businesses do indeed have some of these systems and certifications and this evaluation system will recognize that as part of the overall scoring methodology. | |
| 110 | Section L.5.4.1, Page 82 | CPARS is a great method to obtain unbiased feedback on contractors. Would GSA consider providing additional points for contractors whose CPARS rating for the Relevant Experience Projects were the rating of "Exceptional" would result in 500 extra points for each Project? This will help the governments scoring system discern between "good" contractors and "great" contractors. | |
| | | RESPONSE: The scoring system already provides tremendous weight to past performance and we feel this is appropriately weighted as it is. | |
| 111 | Initial Q&A | We recommend that multiple projects being completed for the same customer, under the same IDIQ contract be counted as a single contract for dollar value determination. While awarded separately, these projects are managed, staffed, and coordinated as if they were a single entity, requiring the integration of unique but related services. We believe this accurately reflects the vision of the OASIS contract for integrated services. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 112 | L.5.3.1, page 80 | We recommend keeping the requirement that all five (5) experiences be prime contracts. If vendors are competing for prime contract awards, it is logical that they must show their experience managing related prime contracts to demonstrate their competence leading, liaising, and accomplish work independent of leadership/guidance from another company. | |
| | | RESPONSE: Thank you for the feedback. | |
| 113 | L.5.3.1, page 81 | Due to the need for similar requirements and understanding, we recommend that all five (5) experience projects be work completed for the Federal government. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 114 | M.5 page 94 | Point thresholds for Volume 3 - Relevant Experience should be changed to \$1.5M, \$3M, and \$5M. This will help more small businesses be eligible for consideration, but will also allow recognition of best in class contractors by maintaining a higher threshold that not all vendors will be able to achieve. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |

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| 115 | M.5 page 95 | Recommend ISO 9001:2008 receive 300 points. ISO 9001:2008 is a process standardization certification that can be applied to a wide range of professional services. While several of the other certifications proposed are also good measures of process control, ISO 9001 is likely to be the most common certification available to the range of vendors interested in OASIS. As such, it is the most beneficial and cost-effective for professional services firms. Therefore, the possession of ISO 9001 shows the vendors dedication to strong process controls in the professional services sector. | |
| RESPONSE: Thank you for the recommendation. We will take it under consideration. | | | |
| 116 | M.5 page 95 | Recommend CMMI Maturity Level 3 receive 500 points, Level 4 receive 550, and Level 5 receive 600. CMMI is a real commitment to quality for a Small Business. While the value to customers is truly significant for Level 3, there is not much more gained by levels 4 and 5 that can be translated to greater value to the Government. | |
| RESPONSE: Thank you for the recommendation. We will take it under consideration. | | | |
| 117 | L5.3.1, bullet 3, page 80 and bullet 5, page 81 | Our government customers work in an environment where Task Orders exceeding a certain level (substantially less than the OASIS \$2M/yr requirement) require multi-level organizational review prior to award. We are a small business with ~\$24M/year revenue stream; we prime 3 BPAs and sub on another \$6M BPAs. For example, we process ~100 task order invoices per month servicing a single BPA via a DCAA compliant accounting system certified to the highest (Cost) type level. HOWEVER, of those ~100 task orders, given our customer's organizational environment, no single task order exceeds \$2M/year, nor are any Cost-Type task orders that exceed \$2M/year. Would the government consider adjusting the Relevant Experience Minimum Requirement stated in L.5.3.1 bullet # 3 to read: "3. Have a total award value for the underlying contract vehicle (BPA, IDIQ etc.) in excess of \$2 Million per Year." And bullet #5 to read: "5. Provide evidence of an adequate accounting system as required by L.5.5.1."? Making this slight adjustment would open the field to high performing small businesses that may not meet OASIS requirements due to government policy and practices. | |
| RESPONSE: We have changed the requirements in this area. Please see the changes blog. | | | |
| 118 | L5.3.1, bullet 3, page 80 | Hypothetically, agencies may have a practice of splitting similar work over several parallel task orders to prevent any single task order from reaching the single-task-order dollar threshold that requires higher level approvals. For example, the agency wants \$2M worth of the same service performed during one year, but issues 13 task orders for \$150k each and one task order for \$50k to avoid higher-level approval requirements. If those task orders are performed in parallel during the same year and have Statements of Work that read almost exactly the same, we recommend the allowance of adding such task orders to one another to reach the \$2M requirement. | |
| RESPONSE: Thank you for the recommendation. We will take it under consideration. | | | |
| 119 | H.6, p. 42 and L.3, p. 75 | Past Performance and Systems/Certification Documentation Requirements for Bidding Entities Significantly Restricts Competition. Sections L.3 and H.6 significantly limit and/or prohibit competition for large businesses structured using subsidiaries and affiliates. For example, a large company that performs large complex projects by tapping and integrating the resources across several of its subsidiaries, affiliates, and/or parent companies may not be able to bid (e.g., due to limits on the size and number of past performances for a single entity) or will not receive enough points to compete, resulting in a no-bid decision. A method that some might suggest -- using a TIN or EIN to identify the bidding entity and for documentation purposes -- is also problematic for large companies that make acquisitions. It takes time to fully integrate an acquired company into a corporate structure, even if the functional integration is complete. Such companies should not be blocked from bidding OASIS because of due to administrative restrictions on past performance documentation and other documentation. To not limit competition, and to enable such companies to compete on OASIS, we request that GSA replace the restrictive language in Section L.3 with the language from the GSA Alliant Contract, Section L.12.2.h: (h) Affiliates – The Offeror shall identify the number of affiliates projected to participate on the Alliant Contract. Commitment letters from affiliates shall be provided with the Offeror's proposal. (1) Such information conforms to the requirements as set-forth herein; (2) There is a "meaningful relationship" between the affiliate, division and/or subsidiary of the Offeror for purposes of performance under Alliant; and | |
| RESPONSE: We have changed the requirements in this area. Please see the changes blog. | | | |
| 120 | L.5.3.2.2, pp. 85-6 and J.5.B, p. 2 | Preventing Protests Related to Relevant Experience Evaluation. GSA is to be commended for designing an evaluation format that is fact-based and that can be completed in a timely fashion. A key part of this strategy is using actual contract and proposal documents to substantiate claims about Relevant Experience. <u>A risk with this approach, however, is that these documents were not written for this purpose and may not contain sufficient clarity for GSA to substantiate the bidder's claims.</u> Frequently, government contracts are written to maintain flexibility rather than provide detailed specificity. Modern procurement practices, such as use of a broad Statement of Objectives or a Performance Work Statement vs. a traditional Statement of Work, exacerbate this issue. In some contracts, even Place of Performance may not be crystal clear (e.g. the contract may indicate the possibility of work in multiple locations but may deliberately not specify them). GSA will be left with the difficult task of substantiating claims for Type of Core Disciplines Performed, Ancillary Service Performed, Ancillary Products Provided, and Places of Performance using documents that were not intended for proposal evaluation purposes. Even the use of Offeror proposals may not resolve this issue; page constraints for proposals often require bidders to write general approaches (e.g., a 25-page proposal discussing how to implement a 50-page SOW is not likely to include the detail that GSA requires to validate Offeror claims). | |
| | | As written, Attachment J.5 does not provide Offerors an opportunity to provide even a small amount of context or background to assist GSA in substantiating claims. Our concern is that Offerors will disagree with the results of GSA's interpretation of contract documents and will seek redress via the GAO protest process or other legal avenues. We recommend that GSA modify Section J.5 to provide Offerors with a limited space (e.g. 500 characters) to provide fact-based context to the contractual or proposal document sections they are referencing to substantiate each claim. The table in J.5 Section B could be easily modified to accommodate by providing a row for context beneath each reference line (e.g. a separate table row for context under each core discipline, each ancillary service, each place of performance citation, etc.). This approach will allow Offerors the opportunity to provide context to government documentation and reduce Offerors' potential grounds for protest. | |
| RESPONSE: Thank you for the recommendation. We will take it under consideration. | | | |

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| 121 | L.5.4.1, p.86; L5.4.2, pp. 86-7; L.5.4.3, p. 87; and M.5, p. 100 | <p>State and Local Agency Projects are Heavily Penalized in the Proposed Evaluation Process. Projects performed for state governments and local governments do not have the opportunity to receive as high a score for past performance as federal projects do. Offerors that choose to show state and local government projects receive half as many points for past performance and no points for small business performance; consequently, they effectively forfeit up to 500 points per project, which will likely guarantee a losing bid. These projects, often partially or fully funded by federal dollars, can be highly relevant to OASIS in their size, scope and complexity. The state or local government official who takes the time to complete a past performance form for their project should be assumed to have the same ethics, character, and dedication to the job as a federal official completing an evaluation for a federal project. Like federal employees, state and local officials are public servants who are dedicated to public service; they possess the same level of objectivity in dealing with their contractors as federal evaluators do.</p> | |
| | | Non-federal projects, especially those for state governments and large local governments, can offer the same complexity, challenges, size, and multi-disciplinary focus as federal projects. We suggest that GSA introduce more equity into the evaluation of past performance projects from state and local agencies. GSA can accomplish this by: | |
| | | <ul style="list-style-type: none"> • Instead of making a distinction between federal projects and those for state and local agencies, make a distinction between government sector projects and commercial sector projects. That would enable GSA to assign point values to past performance scores of 4 or 5 for state and local agency projects the same way point values are assigned for federal projects; | |
| | L.5.4.3, p. 87; and M.5, p. 100 | <ul style="list-style-type: none"> • Instead of giving points to individual projects regarding meeting SB goals, averaging the results for each scored SB element across all of the federal projects submitted, and use that average score to allocate the points. In this way, non-federal projects become a neutral factor in SB goal evaluation rather than a very negative one. Or, choose to score only three of the five projects for SB goals, allowing the bidder to determine which three apply (similar to OCONUS scoring). | |
| | | RESPONSE: Thank you for the recommendations. We will take it under consideration. | |
| 122 | M.5, p. 100 | <p>Points for Meeting Small Business Goals are Too High Given the Other Point Values. The 2,000 possible points allocated to projects meeting/exceeding the small business category goals weights that factor much too heavily compared to project performance. It currently accounts for twice the possible score allocated to project performance, and alone, accounts for nearly 30% of available points. We recommend that GSA reduce the number of points allocated to meeting/exceeding small business goals to no more than 500 (half that of regular past performance points).</p> | |
| | | RESPONSE: We have changed the requirements in this area. Please see the changes blog. | |
| 123 | Q&A #1, Released 4/5 | <p>Definition of a Valid Past Performance Example. In the 4/5 Q&A 4/5, GSA says that IDIQ contracts should not be used as past performance for OASIS. We concur that multiple award IDIQ contracts are not appropriate. However, we strongly recommend that GSA allow Offerors to use single award BPAs and IDIQs (as in the Alliant RFP). Legitimate integrated complex projects are frequently structured as single award BPAs and IDIQs with multiple interrelated and integrated tasks. While the individual tasks may not meet the \$5M minimum threshold, the overall integrated project would. Excluding such projects may make it difficult for companies to present some of their best past performances for OASIS. To ensure that GSA has access to <u>technical</u> past performance information (not just contract management performance), GSA can require that bidders submit Past Performance Forms and accompanying SOWs for 1 or more task orders that in combination demonstrate the claimed OASIS disciplines and ancillary services for that contract.</p> | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 124 | L.5.5.11.1, p. 91 | <p>COPM Masters Degree Requirement Clarification. Very few Masters degrees are specifically in "Program Management" or "Project Management", which the draft RFP specifies. To ensure that well qualified candidates are not excluded due to the specific name of their degree, we recommend that GSA modify the RFP wording to encourage bidders to present a COPM candidate with a Masters degree in a program management- or project management-related field or other discipline relevant to the core OASIS disciplines.</p> | |
| | | RESPONSE: The current draft solicitation, as written, allows for a Master's Degree in Program/Project Management or other discipline relevant to the 6 core disciplines under OASIS SB. | |
| 125 | H.6, p. 42; H.6.8, p. 45; L.3, p. 75; and L.5.5.8, p. 90 | <p>Preventing Protests Related to CMMI and Official Legal Bidding Entity Name. Section L.3 requires that Systems, Certifications, and Resources be in the official legal bidding entity name. However, the CMMI appraisal process is not conducted in a legal contractual context and is not designed to appraise legal entities. For this reason many appraisals will not cite a legal bidding entity name at all. In fact, per the CMMI Institute, the scope of a CMMI appraisal is designed to focus on a specific function within a company rather than a legal entity – the function may span several legal entities. The Draft RFP recognizes this fact on page 45 (H.6.8) by stating that CMMI may focus on "projects, divisions, or an entire organization" or "business units or sites and geographic locations."</p> <p>The Draft RFP--specifically the bidding entity name requirement in L.3--is not consistent with the reality of the CMMI appraisal process as implemented by the CMMI institute. Our concern is that Offerors will not receive points for CMMI even though it is in use by the bidding entity for their Federal projects and that they will seek redress through post-award protest or other legal avenues.</p> | |
| | | We recommend that, for CMMI, GSA provide a different structure for tying the CMMI appraisal to the bidding entity or Federal projects. We recommend that GSA allow as substantiation one of the following: (1) Evidence that the legal bidding entity sponsored the appraisal – e.g. invoice from the appraiser to the legal bidding entity, check from the bidding entity paying for the appraisal; OR (2) Evidence that the CMMI appraisal included appraisal of U.S. Federal projects. A CMMI Appraisal Disclosure Statement cites a small number of appraised projects. Offerors would indicate which projects included in the CMMI appraisal are Federal and provide contract documentation to substantiate. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |

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| 126 | H.6, p. 42; L.5.5.6 - 8, pp. 89-90; and M.5, p. 101 | <p>Quality Certification Duplication and Aerospace Bias. Since there is not a single recognized industry standard quality certification for the wide domains included in OASIS, it is not meaningful for the OASIS evaluation criteria to distinguish between them or apply more points for having more than one certification. To do so prioritizes some Federal clients and types of work (e.g., aerospace) over the others, which will result in a vehicle that is tilted towards some agencies and not as useful for others.</p> <ul style="list-style-type: none"> • For example the AS9100 certification includes all elements of the ISO 9001:2008 certification plus some extra items specific to aerospace. It is unclear why for a vehicle spanning all Federal agencies and their varied mission spaces that an aerospace specific certification would merit extra points but not one for other domains such as environmental management or energy management. Requirement L.5.5.7 prioritizes one mission space (from section C.2) over the others. • Likewise the extra points for additional CMMI levels of certification is out of balance with the other evaluation areas. 100 points for CMMI Level 5 vs. Level 3 (a relatively minor distinction) is equal to 100 points for major elements like having a Secret facility clearance. <p>Our recommendation is that GSA include one evaluation area for "Quality Certifications" for 500 points (same points as Approved Purchasing System) given for having any one of the certifications listed: CMMI (any level), ISO 9001, AS9100. This approach will address the issue of favoring some mission areas and clients over the others.</p> |
| | | RESPONSE: While we do not agree that variances of less than 100 points in a pool of 6,800 points favors any mission or client, but we will take the recommendation under consideration. |
| 127 | L.5.5.9, p. 90 and M.5, p. 101 | <p>Evaluation of EVMSs. Civilian departments, component agencies, and smaller agencies have always had limited desire, resources, and staff to audit vendors' EVMS. The budget issues of the last several years have only exacerbated this imbalance. It is routine for civilian contracts to require EVMS and to include clauses that discuss the government's option to audit the vendors' system, but it is far more rare that civilian agencies actually decide to conduct an audit. As a result, for civilian contracts, companies that routinely provide EVMS may not have any resulting verification of EVMS. To ensure a level playing field for companies whose cognizant agency is a civilian agency, we recommend that bidders be permitted to demonstrate EVMS via: (1) Audit documentation as described in the current draft RFP; or (2) Evidence of three contracts requiring EVM, substantiated with contract documentation.</p> |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. |
| 128 | H.6, p. 42 and L.3, p. 75 | <p>System and Certification Documentation Restrictions. Documentation from a parent company (e.g., adequate accounting system, estimating system, approved purchasing system) should be able to apply for a subsidiary/legal entity that is bidding OASIS. It's not practical to expect that individual subsidiaries/legal entities will have such approvals at the subsidiary/legal entity level. If this restriction remains, many otherwise eligible companies will decide not to bid OASIS because they don't believe they can accrue enough points to compete.</p> |
| | | RESPONSE: We have changed the requirements in this area. Please see the changes blog. |
| 129 | L.6, p. 93 and Attachment J.1, p. 1 | <p>Substitution of Experience for MA/MS Degree Requirement in Senior Labor Categories. We suggest that contractors be allowed substitute additional years of experience for the MA/MS degree requirement for staff in SENIOR labor categories. This is a common practice in federal contracts, and permits us to staff projects with well-qualified employees with extensive work experience who do not have the specified degree. We recommend that an extra two years of relevant work experience (beyond the minimum required for the labor category) be a sufficient substitute for an MA/MS degree.</p> |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. |
| 130 | C.2.1.6, p. 20 | <p>Financial Management Scope Areas. We suggest that loan and grants management be included as service areas under Financial Management Services. Loan and grant programs are an important significant area of government spending and require specialized grants financial management services – for example this scope is specifically represented in the FABS contract with a SIN. We suggest that the OASIS scope will be more complete and the scope determinations more clear for GSA to make if loan and grant management is explicitly included in section C.2.1.6.</p> |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. |
| 131 | C.2, p. 17 | <p>Scoring for Mission Spaces. OASIS is established to provide a strategic sourcing vehicle to serve complex integrated requirements across government and across the 12 mission areas listed in the RFP. However the draft RFP does not currently measure one of the key predictors of future success—bidders' ability to serve multiple mission areas and clients across the spectrum of GSA's customer base. In order to achieve its Strategic Sourcing goals, OASIS needs to be attractive to customers across government. To achieve this objective, we recommend that GSA incorporate some scoring elements into the evaluation criteria that evaluate bidders' ability to serve a wide range of mission spaces. We suggest that GSA adopt the modified list of mission spaces suggested in our next comment, and that GSA grant points to companies whose five past performance projects address multiple mission spaces. For example, GSA can ask Offerors to indicate a single primary mission space for each of their five projects they included in their proposals, and substantiate it via contract documentation in that the same way they substantiate which disciplines apply. If an Offeror's five projects address three or more mission spaces, the evaluation would provide 500 points.</p> |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. |
| 132 | C.2, p.17 | <p>Modifications to the List of Mission Spaces. The list of mission spaces in the OASIS Program Architecture is missing some areas, and contains some elements that are actually functional areas and ancillary services. We recommend adding (1) Community Development and Social Services, (2) Commerce and Economic Growth, and (3) Education to the list of mission areas – each of these items is core to the mission of one or more federal agencies (e.g., HUD, Agriculture, Social Security Administration, Treasury, Commerce, and Education).</p> <p>We also recommend moving "communications" and adding it to the ancillary services list; strategic communications is often an ancillary element of complex projects (e.g., communicating to staff within an organization, or communicating with the general public). Finally, we recommend removing accounting, budget, and compliance as mission areas. Accounting and budget are business functions within the financial services discipline. Compliance is a business function associated with almost every mission area, and according to the draft RFP, is an aspect of program management.</p> <p>Therefore, we recommend that the modified list of mission spaces include: Commerce and Economic Growth, Community Development and Social Services, Defense, Disaster, Education, Energy, Environment, Health, Intelligence, Security, and Transportation.</p> |
| | | RESPONSE: Thank you for the recommendations. We will take it under consideration. |

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| 133 | DRFP/RFI, Paragraph A.1.1(c), Page 8 and https://interact.gsa.gov/blog/white-papers-industry-one-one-sessions-due-may-1 | Paragraph (c) requests specific details and rationale for 6 questions/recommendations. The Interact Blog provides info regarding a white paper for submittal before the One-on-One Meetings. There are significant similarities between the 2 data requests. In order to stream-line GSA reviews and Industry preparation, we suggest that Paragraph (c) be provided only by companies that do not attend one-on-one meetings and not by those attending the one-on-ones because they are providing white papers. | |
| | | RESPONSE: The White Papers serve as the framework for the discussion during the One on Ones. We have limited time during the sessions and this is necessary. We encourage all interested parties to submit white papers. | |
| 134 | Attachment 6 Unrestricted Past Performance Rating Form, and L.5.3.1 | Suggest Adding an "Overall Rating" Score. The scoring shows that the "Average rating" will be used. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 135 | C.2.1.3. Scientific Services (Pg 18) and L.5.3. VOLUME 3 – Relevant Experience (Pg 85) | Through the review of our projects, we have noticed that most of those in which scientific services are primary involve program management and often engineering. However, there seems to be a consistent absence of financial and consulting services and logistics is usually ancillary to the overall effort. Due to the nature of this discipline, we suggest GSA review/research the requirement for four core disciplines within scientific discipline. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 136 | L.4. Proposal Format Table Legend, p. 77 | Recommend allowing 8 point Arial for any contractor created figures and tables. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 137 | M.5., p. 101; L.5.5.10, p. 91 | Recommend adding another element: Top Secret SCI Facility with a value of 300 points. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 138 | B.2.3, p. 12 | The majority of professional service contracts for complex integration are Cost Reimbursable and Cost Plus Award Fee contract types. Our experience is that in certain Government communities there are less than 5% of contracts that require CPARS. We suggest a better measure for these types of contracts are the documented Award Fee scores. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 139 | L.5.1.6, p81 | Requiring eSRS reports to demonstrate socio-economic performance success on only the 5 Relevant Experience contracts, which may not require eSRS submission or may require information about only a subset of socio-economic categories (e.g., WOSB, but not HUBZone), is a very narrow measure of a company's commitment to support socio-economic goals. A better measure of overall performance would be a company's Summary Subcontract Report submitted to DCMA showing percentage of SB dollars spent by agency, and by SB category, or a similar certifiable document. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 140 | Comment/Recommendation j | We support qualification of a company at the parent level. It is a reasonable requirement. | |
| | | RESPONSE: Thank you for the feedback. | |
| 141 | Section L.5.4.2 pg 82 and Section L.5.3.1 pg 85 | Understand the Government's distinction regarding past performance that a BPA or MA/IDIQ is not a project, especially if the IDIQ spans an entire agency or is a GWAC. However, please consider those cases where the IDIQ serves only a single technical office in a single agency, and is limited to between 2-5 awardees who vie for the task orders. In this case, we have a single team of direct labor, subcontractors and consultants who are working across multiple task orders, where each task order is a single program for a single government program manager, and the programs are interrelated, with the program manager and project managers of the IDIQ also performing direct work and managing all the tasks and subtasks. In this case, the work is technically and managerially complex, requiring detailed planning, scheduling, cost accounting, reporting, etc., but the individual task orders do not meet the \$5M/year requirement, but the contract does. In cases such as this, where a single team of individuals is working across multiple interrelated programs in a single technology office of one agency, would this work qualify as a single project for the purposes of OASIS past performance/relevant experience? | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 142 | M.5 page 94 | Number of potential occurrences for projects performed at multiple locations should be limited to 2 for scoring purposes. | |
| | | RESPONSE: Please provide rationale as to why you are recommending this. | |
| | | New this Week | |
| 143 | Section G.3.2.1.1, T&M Labor Hour Award Data; page 32 | The rates requested in Item 4 of this clause only apply to non-competitive task orders per L.6. Please clarify you want is this data only for T&M/Labor Hour Awards that comply with L.6. If not, suggest you clarify this requirement in the Draft RFI. | |
| | | RESPONSE: That Section is for task order reporting requirements. Awarded labor rates for T&M task orders shall be reported in the OASIS Management Module for all Time and Material task orders regardless if competed or not. | |
| 144 | Section L.5.4.3, Socio-economic Past Performance; page 87 | <i>If an Offeror submits a project as Relevant Experience that is a Federal project, but was completed entirely OCONUS and therefore was not required to submit or be evaluated against any SB subcontracting requirements, how will the project be scored in this category?</i> There could be a potential conflict or underscoring of the experience given that no points would be awarded since no documentation is available. <i>Will there be different criteria, or simply be "not considered" as with the Non-Federal projects?</i> By limiting or penalizing these types of projects, GSA may limit competition given the international projects that have come into play. <i>Additionally, if you choose to clarify this, suggest you add a corresponding clarification check-box in Attachment J.4.</i> | |
| | | RESPONSE: As it currently stands, any project that did not have SB subcontracting requirements would not be eligible to receive the points assigned in the scoring matrix. We will take the recommendation under consideration. | |
| 145 | Section L.6.1, Direct Labor Rates; page 93 | GSA states, " Caution , Offereors are strongly advised to provide clear and convincing rationale to support the lower or higher direct labor rate, otherwise the proposed direct labor rate will not be considered fair and reasonable and the Offeror would not be eligible for award regardless of technical score." <i>Why not incorporate the rates in J.2 Attachment 2, into the J.8 spreadsheet and add a delta and explanation column so the GSA has all the rate date and deviations in one location?</i> | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |

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| 146 | Sections L.3, Instructions (page 75) and L.5.3.1, Relevant Experience Minimum Requirements (page 85) | Sections L.3, page 75 and L.3.1, page 85 provide instructions for Relevant Experience requirements with the directive that GSA will accept proposal submissions that represent the Prime Contractor only <u>and</u> where the Parent Company of the Prime is the official legal bidding entity on the SF33. Our understanding is that this requirement prevents consideration of qualifications and work performed by a firm in a joint venture because the joint venture is a separate legal entity. To exclude these project qualifications will result in many large offerors being unable to highlight directly relevant experience to OASIS, and may ultimately eliminate highly qualified firms from participating in the acquisition. Industry recognizes the value in partnering and routinely establishes these unique joint ventures to deliver complex customer program requirements. There are numerous large, integrated international and federal programs, similar to what we expect will be needed for OASIS that are being delivered through Joint Ventures. These examples are definitive demonstrations of the large firms' ability to deliver integrated, large and complex programs worldwide, including for the US Federal Government. It is our understanding that the OASIS team is presently editing Section L.3 and request that projects and programs delivered under a joint venture where the Prime can clearly demonstrate performance of the OASIS services in the required project documentation be considered eligible for consideration. | |
| | | RESPONSE: We will take the recommendation under consideration, but are unlikely to change our position on this matter. | |
| 147 | B.1.3, page 10 | We request and strongly recommend that cost reimbursable contracts be deleted from section B.1.3, page 10. The requirements for cost reimbursable contracts preclude a significant number otherwise qualified small business from participating in the OASIS small business procurement. Section B.1.3 should be limited to Fixed Price, T&M, and Labor Hour type contracts for the OASIS small business procurement | |
| | | RESPONSE: We will not consider this recommendation. Cost reimbursement contracting will be authorized under the OASIS contracts as it is necessary to our clients. | |
| 148 | B.2.1, page 11 | With regard to section B.2.1, the Government should allow contractors to use the labor categories from their GSA schedule contracts that GSA has already reviewed and approved. We believe that the costs associated with implementing OASIS labor categories (for both the Government and contractors) would far outweigh any benefit. This is especially burdensome for small businesses who would have to maintain two labor category systems -- one for OASIS and one for their other GSA schedule contracts. If the Government desires a standard set of labor categories for OASIS, then the solicitation should request that bidders cross-walk their existing labor categories to the OASIS labor categories. | |
| | | RESPONSE: One of the driving factors behind the OASIS contracts is establishing a universal language so that contracting officers can better understand what is being offered and conduct "apples to apples" comparisons of proposals. Not all Offerors will likely have a GSA schedule and many have multiple schedule contracts. Accordingly, we are unlikely to change this. | |
| 149 | H.6, page 42 | We suggest that the Government delete or revise section H.6 and base evaluation of contractor capability on the contractor's demonstrated past performance. There are hundreds of mature, successful small businesses that have outstanding track records of contract performance on FFP, T&M, labor hour contracts that do not have the systems, compliances, and certifications specified in section H.6. Adding these clauses precludes a significant number of otherwise qualified small businesses from participating in the OASIS small business procurement as prime contractors. For example, it is not realistic for a small business to go out and request a DCMA or DCAA review/approval if their existing Federal contracts have not required these reviews/approvals in the past. A similar comment applies to the ISO 9001:2008, AS9100, and CMMI maturity level certifications and EVMS requirements. Some small businesses have 15 to 20 years of absolutely stellar performance on multi-million dollar Federal contracts (\$50M+) and have not had the systems, compliances, and certifications specified in section H.6. The Government is effectively eliminating access to a very large number of qualified small businesses by imposing these requirements. | |
| | | RESPONSE: Section H.6 does not apply to evaluation. Furthermore, these are not required elements. The requirements in Section H.6 only apply if the Offeror claimed those systems and certifications as part of their proposal. | |
| 150 | H.7.3, page 49 | With regard to section H.7.3, will the Government consider deleting this requirement and replacing it with a requirement to use existing GSA mechanisms to promote OASIS such as listing in contractor catalogs posted on the GSA website and use of GSA Advantage! and e-Library? | |
| | | RESPONSE: No. | |
| 151 | H.7.5, page 50 | With regard to section H.7.5, page 50, we suggest this provision be modified to specify that contractors' bidding activity will be reviewed as a criteria for exercise of Option 1. If a minimum number of task order awards is desired prior to exercise of Option 1, then we suggest a minimum of 1 task order award, especially for new vendors to establish a track record. Since that government is specifying the number of contract awards per pool, the government may want to consider if it anticipates a sufficient number of task order awards during each contract year to justify offramping or placing contractors into dormant status, especially in light of federal budget constraints; otherwise, both the government and contractors may spend substantial resources on this procurement, without a reasonable return on investment. The government should consider the number of contract awards per pool such that all awardees would have a reasonable chance of winning task order awards. | |
| | | RESPONSE: We are editing the language. | |
| 152 | L.4, page 76 | In section L.4, page 76, Table Legend, Note 1, please indicate: 1) whether headers and footers can be placed within the 1-inch margin; 2) any exclusions to the page limits such as Table of Contents, section divider pages, etc.; 3) If font size on tables, figures, and graphics may be smaller than 12 point. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 153 | L.5.1.4 and L.5.1.5, page 78 and page 79 | We recommend that the Government delete the sections L.5.1.4 and L.5.1.5. GSA already evaluated and accepted the contractor's practices in these areas as part of the initial evaluation and award of a contractor's GSA schedule contract(s). Adding these sections makes the contractors and the Government spend resources again to describe, review, and evaluate practices that GSA has already evaluated and accepted. | |
| | | RESPONSE: The OASIS Contracts are not GSA Schedule Contracts. The OASIS contracts are being conducted through FAR 15 procedures and have absolutely nothing to do with the Schedules program. These are regulatory required items. | |
| 154 | L.5.2.1, page 80 | We suggest that the Government delete or revise section L.5.2.1 and base evaluation of contractor capability on the contractor's demonstrated past performance in managing contracts of similar size and scope to OASIS. | |
| | | RESPONSE: A determination of financial responsibility is required by regulation and law. | |

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| 155 | L.5.3.1.3, page 80 | Will the Government consider revising section L.5.3.1.3 to allow bidders for Pool 1 to show five contracts that each have a total value of \$2 million? Based on the size standards for Pool 1, the Government will exclude a significant number of otherwise qualified bidders by requiring five contracts valued at \$2 million per year. This is also result in awards to companies that are well over \$10 million per year in revenue and that will likely outgrow the \$14.0 million size standard within the first year of OASIS contract performance. | |
| RESPONSE: We have changed the requirements. | | | |
| 156 | M.5, page 94 | The scoring criteria for relevant experience in section M.5, should be revised since the maximum score for relevant experience would preclude a significant number of otherwise qualified bidders in Pool 1, since the size standard for that pool is \$14 million. Having five contracts exceeding \$5 million per year as the highest score would cause many qualified small businesses in Pool 1 to rate lower in this criteria just because they qualify as small under the relevant size standard. | |
| RESPONSE: The scoring system is not designed for companies to achieve a perfect score. | | | |
| 157 | G.2.6.2., Page 30 | Included among the duties of the Corporate OASIS Contract Manager (COCM) is to verify that the Ordering Contracting Officer (OCO) - a government representative, who is soliciting or awarding a task order solicitation under OASIS has an OASIS Delegation of Procurement Authority. The requirement further states "Verification can be provided by the OASIS CO or OASIS PM" (both government representatives). This requirement appears to establish a process, whereby the contractors desiring to respond to a solicitation must contact the OASIS CO or OASIS PM to validate that the OCO has the authority to solicit under OASIS. It can be envisioned that this requirement will burden the OASIS CO and PM with a number of calls and emails from contractors and places contractors in the position of validating the authority of the government officials releasing/awarding the solicitations. Recommend that OASIS establish a government-to-government verification of authority prior to the release of a solicitation to reduce the burden on the OASIS CO and PM, and eliminate the need for the COCM to validate the OCO's authority. | |
| RESPONSE: Thank you for the recommendation. We will take it under consideration. | | | |
| 158 | M.5 Scoring pg 100 | Because experience in projects exceeding \$50M is required to score points sufficient to receive an award, the scoring system is disproportionately skewed toward very large companies. The Task Order profile for multi-award, GWAC vehicles does not support such a bias. For example, in the Mission Oriented Business Integrated Services (MOBIS) program, with a \$42M average Task Order Value, half of the task orders were written for \$9.9M or less, with \$5M being the most common task order award value. Such a profile would support a much more robust representation from mid-tier companies with portfolios of projects in the \$5M-10M range. Our suggested change is to allow companies with relevant experience in the \$5M-10M range to score 500 points and to de-emphasize the size of projects for relevant experience until such time as a very large Task Order Proposal is requested. | |
| RESPONSE: We find it intriguing that you feel you know what number of points will be required to receive OASIS awards. The flip side to performing large dollar contracts is that is much more difficult to receive the highest past performance ratings. We feel the scoring system is balanced to an extent that companies of any size can manage to win an OASIS award. | | | |
| 159 | L.5.3.1 Relevant Experience Minimum Requirements page 85 | While it is desirable that each citation for relevant experience have primary scope from within one of the six core disciplines, and have a minimum value of \$5M, it is not likely -- nor even desirable -- that the projects integrate activities from four of the six categories. The existing Relevant Experience minimums require that a project supplying Business Intelligence Support also be delivering Business Case Development Support, Environmental Sciences, Human Factors Engineering and Inventory Management. All of that breadth of experience is required by GSA in a project likely to be in the \$5-10M range. Our suggested change is to require integration of three or four different activities from within a single core discipline area, thereby assuring breadth across the discipline without requiring a scope in the task order SOW that may only be found in the largest of projects. | |
| RESPONSE: Thank you for the recommendation. We will take it under consideration. | | | |
| 160 | G2.6.1 (29) | Identifies as a minimum qualification for the COPM, "Demonstrated experience in promoting and managing multiple award, multiple agency, or agency-wide contract vehicles." Does this mean that it is a requirement that the COPM have experience as a program manager on another MAC GWAC or IDIQ contract? Considering a small business is unlikely to hire a dedicated OASIS PM, which would not be a direct charge to the contract and would be cost prohibitive, recommend this requirement be deleted. | |
| RESPONSE: Thank you for the recommendation. We will take it under consideration. | | | |
| 161 | G.2.6.2 (29-30) | States, "The COCM shall have a minimum of 5 years experience in negotiating and administering Indefinite Delivery, Indefinite Quantity (IDIQ), multiple award, multiple agency, or agency-wide contract vehicles including all contract pricing types and contract life-cycles." Does this mean the COCM must have experience as a COCM on another MAC GWAC or IDIQ contract? Considering a small business is unlikely to hire a dedicated OASIS COCM, which would not be a direct charge to the contract and would be cost prohibitive, recommend this requirement be deleted. | |
| RESPONSE: Thank you for the recommendation. We will take it under consideration. | | | |
| 162 | H.7 (48) | The marketing requirements seem onerous for very small businesses. It is understandable that the Government wishes for small business concerns to market OASIS, and larger small businesses are likely to have the resources to invest significantly in marketing the contract, but small businesses under the \$35.5M size standard will have to commit a very large percentage of their marketing capital to meet all requirements, such as Contractor attendance at all meetings (H.7.1.), company-specific OASIS SB brochures to be distributed at various trade shows and conferences (H.7.4), conference and trade show participation (H.7.4), a COPM and COCM (G.2.6), etc. Such requirements, which will require a significant yearly outlay of capital to the detriment of other marketing activities, will limit competition to the larger small businesses. We recommend that the Government either establish a different set of marketing requirements for those businesses competing in Pools 1 through 3 than for those competing in Pools 4 through 6 or that the Government give greater latitude to marketing requirements across all Pools (that is, "encourage" rather than "require" expensive marketing activities). With 40 contract-holders in each Pool, it is unlikely marketing activities will be insufficient to provide | |
| RESPONSE: We will take the recommendation under consideration, but are unlikely to change our position on this matter. | | | |

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| 163 | Att. 3, Background and Pool Identification (3) | States, "By submitting this proposal, we grant the CO and authorized representative(s) the right to examine, at any time before award, those records, which include books, documents, accounting procedures and practices, and other data, regardless of type and form or whether such supporting information is specifically referenced or included in the proposal as the basis for pricing, that will permit an adequate evaluation of the proposed price in accordance with FAR 15.403-3." This requirement seems to go beyond the language of FAR 15.403-3. We recommend that the Government revise this language to conform more strictly with FAR 15.403-3: "By submitting this proposal, we grant the CO and authorized representative(s) the right to examine, at any time before award, those data other than certified cost or pricing data to the extent necessary to determine a fair and reasonable price (10 U.S.C. 2306a(d)(1) and 41 U.S.C. 254b(d)(1)). The data may include, at a minimum, appropriate data on the prices at which the same item or similar items have previously been sold, adequate for determining the reasonableness of the price unless an exception under 15.403-1(b)(1) or (2) applies." | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 164 | I.4.3 Order Limitations, pg 61 | Does the OASIS SB program office see a need to complete subparagraph (b) (1)(2), "Maximum Order Limitations"? It would be unusual for the FAR provision not to contain a Maximum Order Limitation, especially under a small business set-aside. If there are no limitations, as the program office suggests by the use of "N/A," we would suggest the removal of the clause. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 165 | L.2.1 Cost or Pricing Data | We would submit to the program office that this provision is not required. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 166 | L.5.5.7 AS9100 Certification, pg 84 | We object to the evaluation criteria for AS9100 Certification when the preponderance of the work is not aircraft-related. | |
| | | RESPONSE: We included points for all certifications we could in all areas that might be supported by OASIS. | |
| 167 | L.5.5.8 CMMI Maturity Level, pg 84 | We object to the evaluation criteria for CMMI Maturity Levels when the preponderance of the work is not for IT. | |
| | | RESPONSE: Please see earlier answer regarding CMMI and IT. | |
| 168 | L.5.5.11.2 Contract Manager, pg 86 | We object to the evaluation criteria to provide an NCMA-certified COCM under OASIS SB. | |
| | | RESPONSE: Please provide rationale for your objections. | |
| 169 | M.4.5.4 Corporate OASIS SB Contract Manager, pg 94 | We object to the pass/fail evaluation criteria under OASIS SB. | |
| | | RESPONSE: Please provide rationale for your objections. | |
| 170 | | We fully understand the objectives that GSA is seeking in awarding contracts to only the best in the industry. However, as the very purpose of Professional Services contracts is to acquire resources "as needed", it is our experience that many Task Orders issued under the ID/IQ contracts are short term and valued at less than \$2M/year required for consideration of award under OASIS. We believe that the GSA objectives can be met while increasing competition among the Small Business community with the following change to the past performance requirements. From: CAUTION: At least Three (3) out of Five (5) past performance projects must be for work that was for the Federal Government under a contract or task order awarded by the Federal Government AND must be the past performance for the same Five (5) relevant experience projects under Section L.5.3.2. To: CAUTION: At least Three (3) out of Five (5) past performance projects must be for work that was for the Federal Government under a contract or task order awarded by the Federal Government AND must be the past performance for the same Five (5) relevant experience projects under Section L.5.3.2. Offerors may use Task Orders awarded under an IDIQ contract with a value of \$2M or more for each TO. The Offeror may also use the base IDIQ contract provided that the Offeror has been awarded at least three Task Orders and has attained revenues of at least \$6M under the IDIQ contract in the past five years. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 171 | Reference: OASIS SB RFP – Section L.5.3.1, Relevant Experience Minimum Requirements, Pages 80 and 81. | Several questions previously submitted by prospective Small Business Offerors disclosed a concern about the fact that Cost-Reimbursement contracts are rare in the Small Business sector. In fact, based on an analysis of the FPDS data from the years 2011 through 2013 YTD, we have found that although cost-reimbursement (cost plus) might be widely used for large business contracts in the "Professional Services" category, it only represents 14% of the contracted value for these services for Small Business and SDVOSB businesses. Therefore, the mandatory requirement of at least one past performance being a cost reimbursable contract greatly restricts the number of small businesses able to compete for an OASIS award. Also as set forth in several previous questions, the ability on the part of small businesses to properly execute in a cost-reimbursable environment is indicated by their possession of a DCAA audited and certified accounting system. | |
| | | RESPONSE: We have eliminated that requirement. | |
| 172 | | Question: Rather than having one cost-reimbursable past performance be a mandatory requirement for acceptability, would the Government consider, instead, the inclusion of a cost-reimbursable contract in one's past performance being awarded a (bonus) score—for example, 25 points—under Section L.5.3.1? | |
| | | RESPONSE: We have eliminated that requirement. | |
| 173 | Reference: OASIS SB RFI – Section L.5.3.2, Relevant Experience Template, Page 81; and Attachment J.5, Relevant Experience Template | Previous questions discussed the fact that, often, a project's true scope is not clearly delineated in the final contract. Accordingly, the Government expanded the useable "body of proof" to include various RFP documents (including SOWs, SOOs, etc.) and Offeror proposals. Expansions in scope in a contract (perhaps relevant to any of the six OASIS task areas), however, would not be evident in any RFP documents, corresponding Offeror proposals, and potentially, not even in contract modification documents—especially, if the scope changes do not require additional resources or consume additional workhours. | |
| | | RESPONSE: Offerors may provide any contractual document to validate performance of a core discipline. If the activity does not exist in a solicitation, proposal, modification, invoice, monthly status report, or other contract document, then it doesn't exist and will not be evaluated. | |
| 174 | | Question: For this reason, would the Government consider expanding the roster of documents that present verification of OASIS task relevancy to include deliverable reports—such as monthly status reports—and/or briefing papers or formal memos from the Offeror to the Government POC (or vice versa) that furnish evidence that work was performed in the prospective OASIS major task areas? | |

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| | | RESPONSE: We have expanded it to include all contractual documents, which would include deliverable reports. Memos, oral statements, and/or communications are not acceptable. | |
| 175 | H.6.6, Page 44 and H.6.8, Page 45 | Recommend combining ISO and CMMI Requirements for scoring purposes. It is rare that both would be required in the same task order procurement. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 176 | H.4.2.1, Pages 40 & 41 | Recommend additional NAICS assignments to SB pools that can provide sufficient support, i.e. allowing bids from OASIS SB primes across all NAICS if socioeconomic credits are not required by the purchasing agency. | |
| | | RESPONSE: We fail to understand why an OCO would use a set-aside contract if socioeconomic credit was not required. However, doing this suggestion would not be legal. | |
| 177 | M.5, Page 95 | A CMMI Level 3, 4, 5 certification :Development, Services, or Acquisition is a high threshold for Professional Services Companies. Would GSA consider eliminating this optional requirement as part of the scoring evaluation? | |
| | | RESPONSE: No. We will reward those companies who have invested in these certifications as part of an overall scoring methodology. | |
| 178 | M.5, Page 94 | The past performance for this contract is of the utmost importance. Would GSA consider altering the point system to reflect the importance (higher point system)? | |
| | | RESPONSE: Past performance is currently the highest scored portion of the scoring mechanism. | |
| 179 | L.5.4.3, page 87 | As a former SB, we appreciate the fact that the scoring criteria for LBs rewards those companies that helped SBs by meeting or exceeding their contracts' SB goals. As a recently graduated SB, however, we feel that we are overly penalized while making the transition from SB to LB. The current scoring allocates up to 1500 points (22%) to Small Business Goals, twice the points available for scoring "Exceptional" on all contracts, which appears to be out of balance. We suggest that allocating 50 points for meeting the Total SB Goal on each referenced contract and an additional 10 points for each contract meeting each of the socio-economic categories for a total of 500 (9%) available points related to SB Goals. | |
| | | RESPONSE: The point amounts have been adjusted and are now equal between past performance and socio-economic past performance. | |
| 180 | Section L.3 (page 75) | GSA has specifically restricted bidders from creating a new CTA or JV for the purpose of bidding OASIS. We recognize the value of this restriction, and would support similarly restricting the use of such integrating subsidiaries. We recommend the GSA consider changing paragraph L.3 to permit the evaluation of relevant experience from the parent company when a subsidiary is the OASIS prime. Only if it is an existing subsidiary that is used to integrate efforts from other divisions, and this is demonstrated by providing at least one relevant experience program that demonstrates this approach with the subsidiary as prime, and other divisions providing support | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 181 | Section L.6 (page 92) | Offeror's ceiling rates will be based entirely on the first year rates provided in response to the OASIS RFP. While paragraph B.2.5.1 does allow that the escalation rate applied by GSA could change in the future, future pricing will be based on estimates that are up to 10 years old. We believe that the differences between labor category direct labor rates will increase over time to reflect actual market conditions and job skill supply and demand. Applying the same escalation factor to all labor categories makes no consideration for this likelihood. We recommend that the GSA permit offeror's to resubmit or otherwise adjust their pricing by labor category at the end of a 5 year period. The GSA will have visibility into the components of the initial OASIS pricing, and will be able to evaluate these future rates for reasonableness. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 182 | L.5.3.1 (page 85) | The scoring matrix gives no additional points for offerors whose relevant experience crosses multiple mission spaces or market areas. If GSAs objective is to select prime contractors on OASIS who can bring work to the vehicle, then they should value a company with demonstrated experience across a variety of customers and mission areas. Recommend GSA add a criteria for relevant experience that requires a minimum number of mission areas/customers to be supported, and award additional points for programs from a more diverse customer base. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 183 | G.2.6.1 Page 30 | Would GSA consider giving extra points to the contractor who invests in more than two key personnel? | |
| | | RESPONSE: We will consider it, but it is not likely. Detailed suggestions would be more helpful in determining this. | |
| 184 | G Page 28 | There is no language in the contract on how Fair Opportunity is supposed to work. This could be confusing to OCOs especially with all of the different pools. Recommend GSA add Fair Opportunity language into the contract. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 185 | L.5.3.1 (page 85) | We would suggest in Relevant Experience GSA consider an additional measure to show the success in managing IDIQ contracts. We have seen in many cases where a company has the qualifications to be on an IDIQ contract but does nothing with it after award as they do not know how to market work to the vehicle or prepare proposals in a task order environment. We believe that this is just as if not more important than having experience in doing work. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 186 | | The past performance threshold requirements whereby relevant experience must include 4 out of the 6 core disciplines and projects with a minimum award value of at least \$5M per year effectively excludes mid-tier businesses. Keeping the thresholds at these levels may have the unintended result of limiting the number of highly qualified mid-tier companies from submitting a proposal. Mid-tier companies are proven (evidenced by their growth from a small business to a mid-size business), are highly motivated, have less management layers and are therefore more nimble than large businesses, but are as stable. Our average revenue is approximately \$40M per year, we have been a prime contractor on multiple IDIQs with total revenue exceeding \$5M annually, however, individual Task Orders are not typically in the \$5M range. We recommend that you reduce the minimum annual revenue of the unrestricted procurement to \$1M or consider allowing firms to group Task Orders awarded under an IDIQ as one of the Relevant Minimum Experience projects which would allow mid-tier firms to effectively compete. | |

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| | | RESPONSE: We are looking to award to the highest technically rated companies. We are not designing the contract for any specific "tier" or size company. There is no universal definition of "mid-tier" or "mid-sized" company, but we typically hear descriptions ranging from \$50M - \$500M. In either case, \$5M task orders or contracts do not seem to be prohibitive. | |
| 187 | J.4 Checklist, Section L.5.4 | Regarding the checklist for Section L.5.4, the form notes: "If Yes above, is it limited to 1 or 2 projects only? (Note: if NO your offeror is ineligible for award)." We request that Offerors not be prohibited from submitting more than 2 Past Performance Ratings forms (J.5) for federal projects that have not completed CPARS. Some agencies do not/have not completed CPARS, but will be willing to provide a J.5 form. | |
| | | RESPONSE: We have edited this language. All federal projects may either utilize CPARS or J.5. | |
| 188 | H.4.2, page 40 | Regarding GSA's prior response to Q: 115, we would like to support a "cross-pooling" option across pools to encourage competition. Our company performs in multiple NAICS codes listed, but happens to be a SB under the 1,000 and 1,500 employee bucket which is limited to only 1 NAICS code. We strongly encourage GSA to consider that SBs may be able to provide GSA and its customers with a wider range of services if SB awardees are allowed to bid on other NAICS codes TOs. We also suggest that awardees could have access to see the TOs released under other pools, so as to encourage teaming/subbing opportunities, since teams are not defined at IDIQ level. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 189 | L.5.3.1, page 80 | Regarding GSA's prior response to Q:120, we kindly ask you to reconsider allowing Offeror's to combine TOs that are performed for the same customer for the same project/program office, doing the same work, year over year. As GSA is familiar with, due to the nature of federal budgets, many multi-year projects are funded on a year-by-year TO basis, even though the work is continuous, uninterrupted and demonstrates longevity, size, and the complexity that comes with multi-year and larger dollar value projects. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 190 | L.5.5.3 Acceptable Estimating System, L.5.5.5 Approved Purchasing System and L.5.5.9 Earned Value Management System; M.5 Scoring System | With the backlog of DCAA or DCMA audits, would GSA accept verification of requirements from an independent/third audit agency for our Acceptable Estimating System, Approved Purchasing System and Earned Value Management System? | |
| | | RESPONSE: We know of no private organizations who could conduct such an audit. We are open to suggestion. | |
| 191 | M.5., p. 100 | Ancillary Support is scored as many points as Integrating 6 Core Disciplines. Recommend reducing the points awarded for Ancillary Support to 20 points per contract to reflect the relative ease of integrating this Ancillary Support compared with 6 technical functions. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 192 | M.5., p. 100 | Both the CPARS rating and the alternative Past Performance Rating Form include a rating for Utilization of Small Business based on meeting or exceeding Government established goals. This score is the equivalent to a rollup of the score provided by the eSRS report requirement. Recommend simplifying the evaluation process by eliminating the eSRS requirement, which is not available from many contracts, and instead using the CPARS/PPRF to address socio-economic performance success. | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 193 | B.2.1. Labor Categories and Standard Occupational Classifications Section J.1., Attachment (1) | Since OASIS calls for solutions that cross over multiple disciplines, including Information Technology (IT) ancillary support, is it possible to add Labor Categories to support IT Business Process Consulting to the base contract? These services would be fully integrated in support for the Core Discipline initiatives (blending both business and IT expertise). Some suggested labor categories in support for NAICS 541611 Administrative Management and General Management Consulting Services would be: SOC # 15-1111 - Computer and Information Research Scientists SOC # 15-1121 - Computer Systems Analysts SOC # 15-1122 - Information Security Analysts SOC # 15-1141 - Database Administrators (Analysts) SOC # 15-1151 - Computer User Support Specialists SOC # 15-1152 - Computer Network Support Specialists | |
| | | RESPONSE: This is an issue that we are considering. The OASIS contracts are not IT contracts, but we do expect ancillary IT support to be provided on many requirements. For now, the plan is to not include them originally and monitor their inclusion at the task order level and potentially add labor categories at the contract level as necessary. Again, we are considering this. | |
| 194 | B.2.1 page 12 | Labor Categories and Standard Occupational Classifications: Para. 6 states, "Except for ancillary labor as defined under Section B.3., when responding to a request for proposal under task order solicitations, regardless of contract type, the Contractor shall identify both Prime and Subcontractor labor using the Labor ID Numbers, OASIS Labor Categories, as well as, the corresponding SOC Number that applies." It is requested that GSA revisit this requirement as it relates to Fixed Price task orders. Para. B.2.2 does not reflect any requirement for labor breakdowns for the pricing of Fixed Price orders. It is also assumed that invoicing would be based on established milestones. In addition, the award data and invoicing data submittals into the OASIS Management Module (OMM) do not require detail to the labor category level. | |
| | | RESPONSE: That is absolutely correct. Labor category information will not be reported on fixed price task orders. Furthermore, fixed price orders should be designed around deliverables. However, most, if not all, task order solicitations will request a breakdown of the labor that contractors plan to provide or are proposing would be required for their requirement. The labor category/SOC system serves as the universal language of OASIS in describing labor so that OCOs better understand what is being offered. Accordingly, we are requiring that descriptions of labor utilize this language. | |

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| 195 | F.4.1 page 25 | <p>Deliverable and Reporting Requirements: For Deliverable References H.6.1 through H.6.10 the "Frequency" of updates is specified as "Within 3 calendar days after the update". Please note that this 3 day response is not reasonable given the fact that the correspondence and audit reports are sent to the attention of different individuals (typically at a high level) within a company. The review and ultimate distribution down to others within an organization would take more than 3 days - particularly in a very large corporation. For changes to systems it is recommended that OASIS adopt language similar to that used in the current Alliant contract under H.16 Cost Accounting System which states: "The contractor shall notify the ACO and designated OCOs for ongoing orders, in writing, if there are any changes in the status of their approved cost accounting systems and provide the reason(s) for the change." The Alliant language requires reporting a change to "deficient" within 30 days, otherwise, it does not dictate a specific suspense on the reporting of changes. For changes to certifications, it is recommended that OASIS consider including ISO, CMMI, etc, certification changes in an annual report like the one relating to systems in the current Alliant Contract under sections H16 and J.</p> <p>RESPONSE: The "3" is actually supposed to be "30". We will make the edit.</p> | |
| 196 | F.4.2 page 26 | <p>OASIS and Task Order Close-Outs: Section G.3.5 requires the final invoice, release of claims, and all other required close-out documents within 60 calendar days after task completion. As the award of Cost Reimbursable contracts are anticipated under OASIS, companies would be unable to comply with this requirement until the final indirect rates are determined. In addition, large, complex, multiple location task orders, possibly requiring the use of many subcontractors, are anticipated. As such, a 60-day requirement would be difficult, if not impossible, to comply with. It is recommended that OASIS adopt the language used in the Alliant Contract under G.9.8 Order Close-Out which states that the "The contractor agrees to cooperate with the OCO to close-out Orders as soon as practical after expiration.... within the guidelines set forth in: FAR part 4... and FAR Part 42."</p> <p>RESPONSE: We are editing the language.</p> | |
| 197 | G.3.2.3 page 33 | <p>Invoice Data: Request this requirement be amended to be consistent with Alliant requirements for Cost Reimbursable Orders - Direct Labor as a lump sum amount. The request for a Direct Labor Rate for each employee performing is not consistent with the invoicing requirements for most cost reimbursable orders.</p> <p>RESPONSE: We are unlikely to change this requirement, but we will consider the recommendation.</p> | |
| 198 | G.3.5 page 36 | <p>OASIS and Task Order Close-Outs: The 4th paragraph requires the final invoice, release of claims, and all other required close-out documents within 60 calendar days after task completion. As the award of Cost Reimbursable contracts are anticipated under OASIS, companies would be unable to comply with this requirement until the final indirect rates are determined. In addition, large, complex task orders, possibly requiring the use of many subcontractors, are anticipated. As such, a 60-day requirement would be difficult, if not impossible, to comply with. It is requested that GSA reconsider this language and require that the Contractor would agree to close-out task orders as soon as practical after expiration, cancellation, or termination of the order. This language is consistent with the Order Close-Out provisions of Alliant.</p> <p>RESPONSE: We are editing the language.</p> | |
| 199 | H.6 page 42-46 and H.7.2 page 49 | <p>Systems, Compliances, and Certifications: Subparagraphs within Section H.6 specify that for the OCO the OASIS website will maintain a record of each OASIS Contractor's status of - an adequate accounting system, acceptable estimating system, CAS compliance, FPRA or approved billing rates, status of an approved purchasing system, ISO certifications, CMMI certifications, EVMS standards, and Facility Clearance levels. Based on the GSA OASIS website listing on H.7.2, it is clear that GSA intends to publicly publish what all companies consider sensitive and proprietary information relating to their systems and certifications. GSA should reconsider this action, especially in light of the fact that many companies have complex systems. Contractors should be allowed to address system compliance with OCO's in their proposal submittals.</p> <p>RESPONSE: The OASIS program office will never post proprietary information. We don't consider the fact that a company has these systems and certifications as proprietary or sensitive. Actually, we thought it would be an effective marketing tool. For example, "73% of OASIS contract holders have an approved purchasing system" or "68% of OASIS contract holders are CMMI Level 3 or higher." However, we are very open to listening to more specific concerns. We are simply trying to do what is best in promoting the contracts for our Industry Partners and GSA.</p> | |
| 200 | H.7.5 page 50 | <p>Minimum Task Order Awards: We recommend lowering the number of minimum task order awards to three. Rationale: The number of task orders to be awarded under OASIS is unknown, and awards are not within the complete control of the vendors. We note that one firm may have three large task orders worth \$600,000,000, while another may have five with a value of \$100,000. This requirements does not take into consideration the size of task orders awarded.</p> <p>RESPONSE: Thank you for the recommendation. We will take it under consideration.</p> | |
| 201 | L.5.1.7 page 84; L.3 page 75; and H.6 page 42 | <p>Existing CTA: The requirements outlined by GSA for an existing CTA do not contemplate an unpopulated Joint Venture (JV). The requirements in this section, and references in other sections, including H.6 and L.3, specify all relevant experience, past performance, systems, certifications, and resources must all be in the name of the legal bidding entity. In an unpopulated JV, the work is accomplished by the JV member companies within their system/structure vs. developing additional systems specific to the JV. Unpopulated JVs (in particular intra-company unpopulated JVs) offer a great value to the Government. They allow the Government access to all member companies with no additional indirect burdens. It is requested that GSA consider amending the language to allow for unpopulated JVs - utilizing the member companies' past performance/relevant experience, systems, etc., further deleting references to the requirement that all systems, certifications, and past performance be only in the name of the Offeror.</p> <p>RESPONSE: If a joint venture has proven themselves as an entity and meets the pass/fail requirements, they may apply. We are only interested in proven performers for the OASIS contracts. We feel very strongly about this.</p> | |

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| 202 | L.5.3.1 page 85 and M.5 page 100 | <p>Relevant Experience: The current relevant experience requirements do not consider whether a bidder has any experience in the successful management of an MA-IDIQ or governmentwide contract. We recommend that at least one relevant experience must be an IDIQ with a primary scope in one of the OASIS core disciplines and that a governmentwide IDIQ should be worth up to an additional 200 points. RATIONALE: The risk to the government in ignoring this type of experience is that awardees may be unable to successfully manage the unique task order environment and consequently underperform after award. Governmentwide experience is even more important to the government because bidders who have successfully managed governmentwide vehicles have learned to implement effective means of engaging a broad segment of Federal clients with their entire enterprise. This ability is important for the success of OASIS. The process of learning this ability can take years and could limit the value of the inexperience awardees to the OASIS program in the base period. Some awardees may never develop the ability.</p> | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 203 | L.5.4.3 page 87 | <p>Socio-economic Past Performance: It is requested that GSA reconsider it's requirements outlined in this section. It is referring to a Summary Subcontracting Report (SSR), however, these are submitted to an agency inclusive of all subcontracting activity for that agency and not specific to an individual task order. It is assumed that GSA would want to review the Individual Summary Report (ISR) that would be prepared for a specific task order, or absent that, would be submitted for the Prime under which that task order was awarded. Paragraphs 2 and 3 refer to a Final SSR relating to an IDIQ Contract, however, it is the ISR that is specifically submitted relating to a specific contract. We recommend that language for this requirement be confined to the ISR and all references to the SSR be removed.</p> | |
| | | RESPONSE: We are absolutely more interested in obtaining an ISR directly related to the requirement. However, many task orders do not provide this. We are open to suggestion in this area of how to provide credit on task orders in this area. | |
| 204 | L.5.5.2 page 88 and Attachment J.9 | <p>Cost Accounting Standards: This section outlines the requirement to complete J.9, CAS TEMPLATE, for this submittal. Attachment J.9 requires the submittal of audit reports/documentation regarding all CAS compliance or non-compliance issues. It further requires the identification of page and paragraph numbers of audit reports or any other documentation validating any explanation provided. Please note that many very large companies could have numerous Disclosure Statements (possibly greater than 10 or 15). The documentation requested could result in hundreds of pages, inclusive of the reports and the Contractor's responses to the issues raised. In addition, there could be correspondence relating to the possibility of a non-compliance, when there is no certainty there is a non-compliance. Change pages are submitted and subject to audit. It is requested that GSA delete the requirement for Section 6 of the J.9 CAS TEMPLATE requiring the audit reports and documentation. GSA should be able to determine the adequacy based on the completion of Sections 1-5. In general, we have never reviewed an RFP that contained requests for such copious amounts of documentation, including the requirement for updates under F.4.1.</p> | |
| | | RESPONSE: We are responsible for examining the issues associated with any Offeror. We also need this information for proper administration of the contracts after award. This requirement will not likely change. | |
| 205 | L.5.5.3 page 88 and M.5 page 100 | <p>Acceptable Estimating System: An acceptable Estimating System is not a contractual requirement, however, in Section M.5 GSA is assessing an additional 100 points for an acceptable system. An unintended consequence of this is that those Offerors who have not had an audit of their Estimating System would be penalized under this scoring system. Companies have been waiting for years to have DCAA assess their business systems. It is requested that GSA consider amending Section M to eliminate the 100 point assessment for an acceptable Estimating System.</p> | |
| | | RESPONSE: While we understand the basic premise of the recommendation, we feel that when all other things are equal, that companies who have approved systems should be rated higher than those companies who do not. 100 points in a scoring mechanism of 6,800 points is not insurmountable. Accordingly, we are unlikely to take this recommendation. | |
| 206 | L.5.5.11.1 page 91 and G.2.6.1 page 30 | <p>COPM Requirements: L.5.5.11.1 states that the COPM resume must meet or exceed the 5 duties of the COPM cited in G.2.6.1. The five duties cited in G.2.6.1 indicate a strong preference for a COPM who has experience running large GWAC and IDIQ contracts like Alliant or DHS EAGLE. None of these five duties indicate a requirement for skills or experience required in the first two minimum qualifications in L.5.5.11.1, which describe experience required for a project manager who is responsible for successfully delivering a high quality large integrated professional services project to the customer on time and within budget. These requirements define two different types of managers. GSA should be advised that offerors like our company will not propose the most qualified to manage the IDIQ Contract if they score 75-80%. We aim to win with 100% and will bid in accordance with GSA standards and the result may not be what is best for the contract. We encourage GSA to re-evaluate their requirements in terms of genuine value to the overall OASIS program. We recommend that GSA eliminate the first two minimum experience requirements cited in G.2.6.1 and L.5.5.11.1 and change the 4th duty of the COPM cited in G.2.6.1 to read: "Resolving performance issues</p> | |
| | | RESPONSE: Thank you for the recommendation. We will take it under consideration. | |
| 207 | L.5.5.11.1 page 91 and M.5 page 101 | <p>Scoring System: Based on the stated duties of the COPM in G.2.6.1, we recommend that GSA change the L.5.5.11.1 paragraph 3 and M.5 Scoring System table as it applies to the COPM as follows: COPM: 6-10 years experience managing multiple-agency or agency-wide MA-IDIQ contracts - 100 points COPM: 11-15 or more years experience managing multiple-agency or agency-wide MA-IDIQ contracts - 150 points COPM: Master's Degree in management or a technical/scientific/engineering field or additional 5 years experience - 50 points. We further recommend deleting the requirement for PMI certifications Rationale: The primary determinate of future success in the COPM position is experience in similar positions. Thus, a significant predominance of the points relative to this position should be allocated to experience. A master's degree in almost any field is an indication of extra effort and discipline on the part of the person and may have some bearing on their ability to perform well in the position. However, a master's degree in engineering, finance or science (OASIS core disciplines), such as biology, is no more an indicator of potential success as a COPM than an MBA or degree in a technology field. In terms of its relative importance compared to</p> | |
| | | RESPONSE: We do not necessarily agree with your opinion regarding education or certifications, but we will take the recommendation under consideration. | |

