

QUESTION NUMBER	DRAFT RFP SECTION NUMBER	COMMENTS/QUESTIONS/SUGGESTIONS
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.
		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	<p>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?</p> <p>GSA ALLIANT L.12.2.h...</p>
RESPONSE: We have changed the requirements in this area. Please see the changes blog.		
16	OASIS SB and Unrestricted - Section L.5.3.1 Relevant Experience Minimum Requirements - Pages 80-81 - Clarification to Response #9	<p>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.</p>
RESPONSE: We have changed the requirements in this area. Please see the changes blog.		
17	Section M.5 starting on Page 94	<p>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.</p>
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	<p>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.</p>
RESPONSE: Please see the various responses regarding teaming.		
19	General Question	<p>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.</p>
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	<p>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.</p>
RESPONSE: Thank you for the recommendation. We will take it under advisement.		
21	Section L.5.1.7, page 79	<p>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.</p>
RESPONSE: Please see earlier response regarding teaming.		
22	Section L.5.3.1, page 80	<p>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.</p>
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.
		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 associated 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.
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 references 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.		
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 signifact 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 expereince 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.
		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 Ariel or 9 pt Ariel 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	<p>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.</p> <p>RESPONSE: We have changed the requirements in this area. Please see the changes blog.</p>
69	Section B.2.1; Page 11 and Section J.1, Attachment 1	<p>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.</p> <p>RESPONSE: Thank you for the recommendation. We will take it under advisement.</p>
70	Section G.2.6; Page 30	<p>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</p> <p>RESPONSE: Thank you for the recommendation. We will take it under advisement.</p>
71	Section H.6.4 Forward Pricing Rate Agreements and Approved Billing Rates, Page 44	<p>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.</p> <p>RESPONSE: Thank you for the recommendation. We will take it under advisement.</p>
72	L.5.4.2 PAST Performance, page 86 - 87	<p>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.</p> <p>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.</p>
73	L.5.5.1 Adequate Accounting System, page 87	<p>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.</p> <p>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.</p>

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 <u>Operations Management, Organizational Behavior, Stakeholder Management and Change Management</u> . Noted
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		
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.5.5.1to 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.
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.
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	<u>Section F.4</u> 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. <u>Section F.4.2 Compliances</u> states - "The following table contains compliances required for OASIS". Additionally, for every reference and compliance, it states that the Contractor " shall " maintain, if applicable. <u>Section H.6</u> 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. <u>Section L.5.3 through L.5.5.10</u> 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, " <i>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).</i> " 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 <u>receipt</u> of modification from the customer or within 30 days of the modification being <u>fully executed</u> ? 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 orders5.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.
		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 S 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.
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.
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	<p>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.</p> <p>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.</p> <p>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</p>
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	<p>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).</p>
		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.		

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>
		<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:</p>
		<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>
		<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.</p>
RESPONSE: Thank you for the recommendation. We will take it under consideration.		

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>
		<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.</p>
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>
		<p>RESPONSE: Thank you for the recommendation. We will take it under consideration.</p>
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>
		<p>RESPONSE: We have changed the requirements in this area. Please see the changes blog.</p>
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>
		<p>RESPONSE: Thank you for the recommendation. We will take it under consideration.</p>
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>
		<p>RESPONSE: Thank you for the recommendation. We will take it under consideration.</p>
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>
		<p>RESPONSE: Thank you for the recommendation. We will take it under consideration.</p>

132	C.2, p.17	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). 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. 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.
		RESPONSE: Thank you for the recommendations. We will take it under consideration.
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/Recommendationj	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.
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.
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 <u>only 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. <u>Accordingly, we are unlikely to change this.</u>
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 <u>by imposing these requirements.</u>
		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.
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 burdon 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 Reuirements 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). <i>With 40 contract-holders in each Pool, it is unlikely marketing activities will be insufficient to provide</i>
		RESPONSE: We will take the recommendation under consideration, but are unlikely to change our position on this matter.
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?
		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.
		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: <i>"If Yes above, is it limited to 1 or 2 projects only? (Note: if NO your offeror is ineligible for award)."</i> 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.
195	F.4.1 page 25	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- RESPONSE: The "3" is actually supposed to be "30". We will make the edit.
196	F.4.2 page 26	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." RESPONSE: We are editing the language.
197	G.3.2.3 page 33	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. RESPONSE: We are unlikely to change this requirement, but we will consider the recommendation.
198	G.3.5 page 36	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. RESPONSE: We are editing the language.
199	H.6 page 42-46 and H.7.2 page 49	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.

		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.
200	H.7.5 page 50	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.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
201	L.5.1.7 page 84; L.3 page 75; and H.6 page 42	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.
		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.
202	L.5.3.1 page 85 and M.5 page 100	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.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
203	L.5.4.3 page 87	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.
		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	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.
		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	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.
		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	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 related to OASIS and also issues. 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	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 Points - 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 experience, award RESPONSE: We do not necessarily agree with your opinion regarding education or certifications, but we will take the recommendation under consideration.
208	L.5.5.11.2 page 92 and M.5 page 101	Corporate OASIS Contract Manager (COCM): The duties and requirements as outlined in G.2.6.2 are reasonable and consistent with those for similar positions on GWAC contracts. Section L.5.5.11.2, however, adds language indicating that "it is encouraged" that these COCMs have a Masters Degree and at least one professional acquisition certificate. The scoring under M.5 adds an additional 50 points for the degree and 50 points for at least one certification. This additional language in Section L and scoring in Section M overemphasizes the value of a Masters Degree and certifications as they relate to the ability to manage a vehicle such as OASIS. This may have unintended consequences--taking the focus away from capability and experience. It would be anticipated that in order to gain an additional 100 points, Offerors would seek out individuals to propose for this position solely based on the fact that they have the Masters Degree and at least one certificate. The focus should be on the individual's capabilities and experience in managing vehicles such as OASIS (Alliant, Millennia Lite, ANSWER, etc.). It is believed that GSA is seeking an individual that will be truly engaged in managing this vehicle. It is recommended that GSA allow the substitution of an additional 5 RESPONSE: We do not necessarily agree with your opinion regarding education or certifications, but we will take the recommendation under consideration.
209	L.6.2 page 93	Indirect Rates/Profit: Contractors forward pricing rates typically only go out 3-5 years. In prior RFPs with rates going out 15 years, contractors have been allowed to add risk % to cover indirect rate risk in the out years. Will you consider allowing a risk % added to rates in the out years? RESPONSE: We don't anticipate that these rates will actually be utilized very often, but if you have a specific recommendation for the mechanics of how to implement something like you are referring to, we'll take it under consideration.
210	L.5.3.2.3, p 86	You have answered that GSA has no mechanism for receiving and scoring classified relevant experience. Most Intelligence Community agencies will not allow redacted or unclassified program documentation (SOWs, WBS, Contract). Would GSA consider allowing the government contracting officer (for those contracts with classified contract documentation) to sign the relevant experience template certifying the information in lieu of providing the program documentation in a manner similar to that for past performance that is not in CPARS? RESPONSE: This is an interesting suggestion. We will take this under consideration. New this Week
211	G.2.6.1 OASIS COPM	For the small business, we request that the COPM have 3 years experience instead of 5 RESPONSE: Thank you for the recommendation. We will take it under consideration.
212	H.6.8 CMMI Maturity Level	Along with CMMI - given the scope of work we humbly request that the government include not only CMMI for development but also CMMI for services - CMMI - SVC RESPONSE: Thank you for the recommendation. We will take it under consideration.
213	L.5.3.1 Relevant Experience Minimum Requirements	As a small business that is interested in participating in pool number 1 (which is defined by the NAICS of \$14M), we humbly request that you change the award value of \$2M per year. As a small business, most companies that would have 5 past performances totalling \$2M per year would almost be too large to participate in this pool. We suggest that for the small businesses wishing to participate in pool 1, that you change that to either \$500K or \$1M per year. RESPONSE: Please see the changes and previous responses to similar recommendations.
214	L.5.5 Systems Certifications and Resources	As a small business, we would humbly ask that CMMI SVC also be included. Also, we suggest that give the small businesses interested in participating in pool one that some points be credited for organizations that have gone through expense of an assessment and have achieved a CMMI Level 2 certification. RESPONSE: Thank you for the recommendation. We will take it under consideration.
215	M.5 Scoring System	The scoring template shows separate scores for both ISO 9000:2001 and AS9100 certifications. These two certifications are essentially the same in concept. We believe that the Govt will be better served to delete the AS9100 scoring item and replace it with a rating score for the ISO 20000 standard. This is a fairly new standard and companies who have achieved this are generally working diligently to make sure that their processes are at the highest levels.

		RESPONSE: Thank you for the recommendation. We will take it under consideration.
216	M.5 Scoring System	Recently the minimum threshold for Past Performance was changed to \$750,000 annually. However, the minimum for receiving any evaluation points remains at \$3,000,000 annually. It is very unlikely that small businesses will have projects that exceed the \$3,000,000 threshold. The evaluation scoring plan needs to be reflective of the minimum Past Performance threshold.
		RESPONSE: Please see previous responses to similar recommendations.
217	SECTION M - EVALUATION FACTORS FOR AWARD	It is our understanding that the Government wishes to award to "Best of Breed" contractors as based on their proven past performance. Since most of the points rely on Past Performance and experience while delivering for the Federal Government, we would like to request that the OASIS Team create a separate line item to award points for Government issued award(s) and certification(s) to demonstrate proven Best of Breed companies, (for example Small Business of the year, or Administrators Award for Excellence)
		RESPONSE: Thank you for the recommendation. We will take it under consideration. If you have specific awards or certifications, we would be interested to hear about them.
218	Section L.5.5.11.2	Would the Government consider accepting a 30 credit Certificate (Master's Degree are typically 30 credit hours)in Procurement and Contracts Management from an accredited school (such as the University of Virginia) in lieu of a Master's Degree "in a related field"? Since both require the same amount of work and credit hours to complete.
		RESPONSE: No.
219		- CMMI requirement should not be a universal requirement. The CMMI requirement may not require in Science and Engineering tasks. Again it depends on the task orders in Scientific /engineering with Information technology. We think the CMMI requirement should be taken out from the RFP.
		RESPONSE: Please see previous responses to similar recommendations.
220		- Another issue: The tasks listed in scientific functional area need to look at closely in developing subcategories. For example, Mathematic and statistical/deterministic models should be part of scientific area.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
221	G.2..6 Contractor Key Personnel	Understanding that we are a small business we humbly ask government allow for a letter of signed commitment for the COCM
		RESPONSE: Given the length of time between proposal submission and contract award, we do not feel that letters of commitment will be very effective. We are requiring the Key Personnel proposed to be employees of the Offeror.
222	L.5.4, Past Performance and M.5	There is a heavy emphasis in the scoring criteria on meeting or exceeding small business, HUBZONE, SDB, WOSB, VOSB, and SDVOSB goals. In total, there are 300 points associated per past performance project available on all 5 projects (5 occurrences). Many large, complex contracts that would be most similar to an OASIS type of project do not have goals across each and every category. Would GSA consider limiting the small business, HUBZONE, SDB, WOSB, VOSB, and SDVOSB point values to a maximum of 3 occurrences versus 5 consistent with DCMA's Form 640 criteria of meeting 3 or more socio-economic goals to be evaluated as highly successful.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
223	Section L.5.5.5 Approved Purchasing System	L.5.5.5. awards 500 points for a having an approved purchasing system. Very few, if any, Services Contractors under \$14.5M size standard are able to get our purchasing system approved, because small businesses under \$25M are not required by regulation to have one, thus getting one from ACO (DCMA) is near impossible. Awarding 500 points for this greatly skews the competition; for example, it makes having an approved purchasing system worth more than a Top Secret Facility Clearance and CMMI Level 5 combined. Therefore, we recommend that the government reduce the point value for this from 500 to 100 – we respect that a company with an approved system had to work hard to achieve it, but they should not be rewarded to the level currently set.
		RESPONSE: Please see previous responses to similar recommendations.
224	L.5.5.6. ISO 9001:2008 Certification	The government should consider requiring either CMMI Level III or ISO 9001:2008 as a core requirement to be awarded an OASIS contract. Small businesses under \$14.5M that achieve a level of maturity should be rewarded equally. The two most common corporate certifications are CMMI Level III and ISO 9001:2008. Industry sees these certifications as equal in terms of the commitment and maturity levels required to achieve them. Alternatively, if ISO or CMMI is not made a requirement, then at a minimum, award the same level of points to ISO 9001 as you do for CMMI Level III(Srv). Since OASIS is not an IT/ Software development contract, thus high CMMI maturity should be no more of a factor than registered and audited service based processes.
		RESPONSE: Please see previous responses to similar recommendations.
225	L.5.5.8 CMMI Maturity Level (submitted via TRADE Organization)	CMMI requirements are set such that Level 4 and Level 5 Maturity garner substantially more points that a Level 3 Maturity. CMMI Level 3 demonstrates a mature process, and most agencies do not require more than a Level 3 and would not want the added cost of certifying to a CMMI Level 4 or 5. As the purpose of the initial evaluation process is to establish a large pool of qualified providers, would GSA consider changing CMMI requirements to give one point value for CMMI Level 3 or above? Level 4 and Level 5 maturity could still be applied as distinguishing requirements for specific task orders.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
226	H.4.2.1 NAICs Pools (submitted via TRADE Organization)	The use of multiple NAICs Pools may serve to confuse potential clients of the OASIS contract and may result in more extensive training for agency DPA's, both of which would negatively impact use of the OASIS vehicle. Will GSA consider eliminating or simplifying the 6 NAICs Pools presently projected for use in soliciting Full & Open task order opportunities?
		RESPONSE: No.

227	L.5.3, Relevant Experience at	<p>The draft RFP clarifies that a GWAC or MA-IDIQ contract should not be considered to be a project. Rather, a task order under one of these types of contracts would be considered a project. The draft RFP further clarifies that a single agency IDIQ contract cannot be used for Past Performance.</p> <p>There is great variation as to the nature of single agency IDIQ contracts. A single agency IDIQ contract can be used by a single client and to support only that client's specific mission. In that case, all task orders, in aggregate, represent the 'project'. The contract is operated and managed as a singular project by the contractor and the client views the work under the contract as a singular project.</p> <p>Will GSA consider these more focused types of single agency IDIQ contracts as a project and not limit projects to just the individual task orders under such a contract? Doing so would allow offerors to demonstrate complexity across the core OASIS disciplines that are truly embodied under this type of single agency IDIQ contract.</p>
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
228	Section M.2	<p>We recommend the Government consider Best Value with Tradeoff process as the process for award decision. Best Value with Tradeoff process will maximize the Government's flexibility in making Technical-Price trade-offs. For example, if a scenario were to occur whereby Offeror A, the 40th Offeror in Pool 1, has 1,000 points and (for simplicity) their average Rate in the Section J.8 COST-PRICE TEMPLATE is \$64 and Offeror B, the 41st Offeror in Pool 1, has 999 points and their average Rate in the Section J.8 COST-PRICE TEMPLATE is \$52 the Government would have the flexibility to make the trade-offs that would result in a best value award from the Government's perspective.</p>
		RESPONSE: We respectfully and whole-heartedly disagree with this recommendation. Utilizing pricing for contract award selection that does not accurately reflect price realism for the entire contract is artificial and unrealistic. Accordingly, it is an improper basis for a trade off decision.
229	Section M.2	<p>We recommend that Section M.2 specify whether award will be made using Best Value with Tradeoff process (at FAR 15.101-1) or Best Value with Lowest Price Technically Acceptable process (at FAR 15.101-2).</p>
		RESPONSE: The OASIS source selection strategy will utilize neither approach you mention. The OASIS source selection process shall utilize the highest technically rated approach mentioned at FAR 15.101-1(a).
230	Enter Section Number and Page Number	<p>We would recommend that proposals be required to include some discussion of partnership or sub-contractor management for firms to demonstrate they have the capability to manage complex integrations and/or multi-partner teams beyond what might be presented indirectly through "Past Performance" and "Relevant Experience"</p>
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
231	G3.4 , page 33 and section M, page	<p>The use of CPARs as such a significant portion of the evaluation process, when offerors have so little influence on whether a Contracting Officer provides data, will unnecessarily limit access of small businesses to the vehicle. Arguably, whether a firm has a rating in CPARs may or may not indicative of its past performance on any particular task or more generally across a variety of tasks.</p>
		RESPONSE: Please see previous responses to similar recommendations.
232	M.5. SCORING SYSTEM, page 95	<p>We believe that the points allocated to certifications for small businesses is inconsistent with how small businesses grow and remain profitable. Pursuing such certifications represent a fixed costs, which are difficult for small businesses to incur because their relatively narrow base of revenue makes it difficult to allocate such fixed costs across projects and remain profitable. Similarly, we also recommend that an approved purchasing system for a small business should not be scored at all. Arguably, such requirements might only be met by firms in the unrestricted contract or the largest two pools in the small business.</p>
		RESPONSE: And yet, we receive feedback all the time from small business contractors who do have one or more of these systems and certifications. We have said it before and will continue to say this in response to the principal of "no small business will have ____, so therefore you should remove it from the scoring chart". If no small businesses have a given item, be it a high dollar relevant experience example, a system, a certification, or whatever, then that is an irrelevant factor and it makes zero impact whether the factor was present or not. On the other hand, however, if some small businesses do have these things, then they are effective segregators. We will let the evaluation prove who has what.
233	Section J.1	<p>Offerors should be allowed to use the labor categories they deem appropriate. For small businesses that are growing, they acquire labor categories incrementally as their contracts, task orders and staff grow. Since the requirement is that prime integrate across three core disciplines, but not necessarily deliver across all three, it seems more reasonable that the labor categories will be a relatively narrow set that the prime should be able to propose.</p>
		RESPONSE: Absolutely not. Standardization of labor categories is a primary consideration for these contracts based upon client feedback.
234	J.5, (Attachment (5), C; P. 2	<p>None of the documentation that the Draft RFP or Attachment J-5 requests will have been prepared specifically to support an OASIS proposal effort. As a result, GSA will be required to make subjective decisions as to relevancy based on limited information and documentation prepared for other purposes. This subjective evaluation could result in inappropriate disqualifications. We recommend that the contractor be allowed to write and submit one introductory page for each relevant experience write-up. Each write-Up would address the context or objective of the project along with providing specific evidence. or reference to the six core disciplines. Request that GSA expand the types of documentation that can be attached to include descriptive work products and periodic reports. Also suggest that the contractor be permitted to highlight the specific paragraph or parts of the page relevant to establishing relevance experience as suggested elsewhere in the Q&A's.</p>
		RESPONSE: Please see previous responses to similar recommendations.

235	M.2 Basis for Award; p.89	Draft RFP provision indicates that the Government intends to make 40 awards in each OASIS SB Pool. We recommend that GSA increase this number to 70 awards for each OASIS pool. Alliant Small Business(ASB), one of the most successful small business contracts in the industry operates with 69 primes. On ASB each task order request receives an average of about 4 proposals. With a significantly smaller pool of 40, representing a much wider range of disciplines, the customer is likely to receive only one or two responses. More awardees mean more contractors bringing more professional services work to OASIS SB. This means a more robust program for GSA and more money to cover GSA's OASIS SB administrative costs. We request that GSA reconsider its maximum pool size.
		RESPONSE: Our plan is to start with 40 and closely monitor competition levels. If we need to add more, we shall.
236	L.5.5.6 ISO 9001-:2008 Certification and L.5.5.8 CMMI Maturity Level; p.84-85	Recommend that ISO 9001-2008 certification be combined with CMMI Levels 3,4,and 5, to form a single scored item. In practice, customers rarely seek more than one of these certifications for assurance of quality. Both are applicable to a wide range of requirements and in many cases customers may not wish to pay for higher CMMI levels.
		RESPONSE: Please see previous responses to similar recommendations.
237	H.11.2 Vertical Pool Ramping (to OASIS unrestricted); p.55	Last paragraph in this section says that if a contractor is successful in vertical on-ramping, it will be placed on Dormant Status under the OASIS SB Pools which the contractor is no longer eligible. We recommend that the term, "inactive" be used to express the contractor's status in this case as opposed to "dormant" Everywhere else in the draft RFP the term, "dormant" is used to describe a status where the contractor has not complied with contractual requirements, i.e. the "dormant" term has a pejorative meaning. Companies that "graduate" to another pool should not be labeled with a pejorative status.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
238	G.2.6.1 and G.2.6.2 Corporate OASIS Program Manager and Contract Manager -- requires that these personnel attend off PMR and other OASIS meetings and conferences as scheduled; p.29	Request that Government change the requirement concerning attendance of <u>all</u> PMR and other OASIS meetings to most meetings, particularly as the requirement relates to off-site meetings requiring travel. Just as GSA is experiencing severe travel constraints, many small businesses have similar constraints. Simultaneously, the requirement to send both the OASIS Program Manager and OASIS Contract Manager, two key personnel, out-of-town at the same time could put the OASOS SB contractor's OASIS SB program at risk. We suggest that the requirement be restricted to attendance of only one key personnel and that the requirement allow attendance of substitute personnel.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
239	G.2.4 Industrial Operations Analyst; p.27	We request that the following sentence be added to the end of this paragraph: " The OASIS SB CO or an authorized representative shall have the right to conduct these audits or examinations not more frequently than every two years, except when there is specific evidence of malfeasance. In cases where there is specific evidence of malfeasance the Government retains the right to conduct audits whenever necessary. In cases where there is no malfeasance the Government shall provide the contractor with at least 30 days' advance notice of the audit or examination.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
240	G.3.3.1; p.34	Recommend that GSA align the percentage with its own small business subcontracting goals and/or performance which according to SBA Goaling Reports were at 35.9% (goal) and 30% (achieved) for 2011, the latest records available from the SBA online goaling site.
		RESPONSE: Please see previous responses to similar recommendations.
241	F.4.1 Deliverable and Reporting Requirements; p.24	We request that the Government change the third sentence in the first paragraph to read: The Government maintains the right to request other deliverables or reports not specifically listed in the table below in order to comply with new regulatory or statutory requirements. The Government agrees to provide the contractor with no less than three months' notice prior to the required delivery date of any new contractual requirements.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
242	H-6.1 through H.6.10.1; p.24-25	Reference is made to the "FREQUENCY" column of the Deliverable and Reporting Requirements Table. We request that any item in this column that currently reads, "Within 3 calendar days " be changed to "Within 3 government business days" to allow adequate time to reasonably respond and to allow for weekends and Federal holidays.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
243	F.4.2 Compliances; p.25	Request that the Government change the third sentence in the first paragraph to read: The Government does not waive its right to request other compliances in order to align the OASIS SB contract with new statutory or regulatory requirements. The Government will provide the contractor with at least 90 days' notice of these requirements.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
244	H.7.2H.7.3 Contractor OASIS SB Webpage; p.49	Recommend that government include requirements related to Rehabilitation Act Section 508 compliance
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
245	H.7.5 Minimum Task Order Awards; p.50	This is an unfair requirement and GSA may not be able to implement it uniformly. For example, should companies that are on-ramped be forced to meet the three-task order requirement even though their base period is shorter? Suppose only a few task orders are released under a designated pool and very few companies are able to meet the requirement? Consider that some companies will be participating only in a single pool -- should they be held to the same standard as companies that can participate in multiple pools? If GSA is concerned about the administrative costs associated with companies that are not active participants, consider charging a use fee to those companies that win less than a single task in the past period.
		RESPONSE: Please see previous responses to similar recommendations.

246	F.4 Performance Standards; p.23	We request that the following sentence be added to the end of the cited paragraph: The OASIS SB CO or an authorized representative shall have the right to conduct these audits or examinations when there is specific evidence of malfeasance on the part of the contractor. When there is no evidence of malfeasance the OASIS SB Co or authorized representative shall have the right to conduct audits or examination no more frequently than every two years. In addition where there is no evidence of malfeasance, the government shall provide the contractor with 30 days' advance notice of an impending audit or examination.
RESPONSE: Thank you for the recommendation. We will take it under consideration.		
247	C.2 Scope; p.16	The draft RFP states that "The scope of OASIS SB spans many areas of expertise and includes any and all components required to formulate a total solution . . ." However the pool structure lists only a limited number of NAICS codes which may not reflect the universe of professional services within and outside of the 541 NAICS code category. We recommend that GSA consider adding additional NAICs codes to the Pool Structure. We specifically request that NAICS Code 561210 for "Facilities Support Services" be added to the contract. It is truly an integrated service typically involving the orchestration of multiple disciplines and areas of expertise most of which are professional or executive level services as defined in the FAR Subpart 22.401.
RESPONSE: As defined by the Census Bureau, NAICS code 561210 is not for professional services or professional labor. <i>"This industry comprises establishments primarily engaged in providing operating staff to perform a combination of support services within a client's facilities. Establishments in this industry typically provide a combination of services, such as janitorial; maintenance; trash disposal; guard and security; mail routing reception; laundry; and related services to support operations within facilities. These establishments provide operating staff to carry out these support activities; but, are not involved with or responsible for the core business or activities of the client."</i> We will not be adding this NAICS code to the OASIS contracts. If you have other specific recommendations, please let us know.		
248	L.5.3.1 (Page 80)	A criteria for the Past Performance indicates that it should "3. Have a total award value of at least \$2 Million Per Year". Is \$2 million threshold criteria for each Past Performance or a total for all 5 Past Performances? It would seem that if each project needs to be at least \$2 million and the Government is requesting demonstration of 5 distinct projects, that it will be difficult for an established small business to qualify for OASIS Pool 1 (\$14M Business Size Standard). Five projects of \$2 million or more in total award value will quickly approach the defined NAICS small business size standard. In order to promote small business so that they are given an opportunity to grow and deliver through the OASIS vehicle to the Government, it is our recommendation that the Government consider lowering the Past Performance total award value threshold to \$250,000 per year per Past Performance.
RESPONSE: Please see the changes and previous responses to similar recommendations.		
249	L.5.3.1 (Page 80)	As a Small Business, a number of our Past Performances were performed as a sub-contractor to a large Prime contractor for the Government. Our business was established in 2010, has a MOBIS schedule and has recently begun priming contracts to the Government. For Past Performance, the draft solicitation states it is a requirement that "5. At least One (1) project must be for work performed under a Cost-Reimbursement contract type." We have yet to deliver on a Cost-Reimbursement contract. This requirement would seem to preclude firms like ours from submitting as a Small Business to OASIS. We recommend the Government consider removing this requirement from the Past Performance submission requirements.
RESPONSE: Please see the changes and previous responses to similar recommendations.		
250	M.5 Scoring System (Page 94)	The Point Values identified in Section L.5.3 appear to favor larger projects with more points. This seems to counter the intent of the solicitation by rewarding larger small businesses that may be on the cusp of graduating in size. For instance, if individual projects exceeding \$3, \$4 and \$5 million per year in total award value per project are seen as more valuable in the established Scoring System, it will be difficult for small businesses with a NAICS size standards of \$14M or \$19M to qualify for OASIS Pool 1 or OASIS Pool 2. It is recommended that the Government consider removing or decreasing the project total award values so that the total Maximum Points per Element is advantageous for promoting small businesses with NAICS size standards of \$14M or \$19M.
RESPONSE: Please see the changes and previous responses to similar recommendations.		
251		Revise the past performance evaluation criteria to more closely align the scoring for commercial sector past performance with the scoring for government sector past performance.
The draft solicitation states that the maximum past performance score for federal government work will be worth twice as much as the maximum past performance score for commercial sector work. We urge GSA to reconsider this variation in scoring for commercial and federal government work and to revise the scoring so that evaluations of commercial work are given the same weight as government evaluations. The preference given to federal government work in the scoring criteria is apparently based on GSA's trust in the past performance evaluations for federal work available in the Past Performance Information Retrieval System (PPIRS) and the Contractor Performance Assessment Reporting Systems (CPARS). However, it is widely accepted that the past performance evaluations in such databases are often inaccurate, incomplete or missing. If during the source selection evaluation GSA conducts meaningful market research and exercises due diligence when checking contractors' references, GSA will be able to accurately assess a contractor's performance on commercial sector work. In fact, the federal government has a long record of permitting and evaluating contractor past performance on commercial sector work. Hence, there is little reason for commercial sector past performance to be given any		
RESPONSE: As the client base for the OASIS contracts will be the Federal Government, and contracting with the Federal Government is significantly different than commercial contracting, we do not feel that a commercial contractors first attempt at Federal Government contracting should be performed on the OASIS vehicle. In fact, we feel that is a recipe for disaster for both the Contractor and our clients. As we have stated numerous times, we are looking for proven performers for the OASIS contract, and Government contracting is unique.		

		<p>Now, that's not to say that a Contractor couldn't have experience in Government contracting, but want to submit commercial examples for relevant experience on OASIS. This presents our biggest challenge and the reason commercial past performance is valued so much lower than Government experience. We, as Warranted Contracting Officers, have the responsibility of safeguarding the public trust. Our evaluation schema is most heavily weighted on Past Performance. Accordingly, we have to be able to trust the information we receive. Nobody on the OASIS team will try to defend the Government Past Performance system as perfect, but it is independent and free from financial bias. Contractors also have the right to challenge ratings as part of the vetting process. While certainly not a perfect system, it is the only one we have. No amount of "due diligence" will ever eliminate the possibility that a commercial past performance survey may be biased due to business arrangements and financial interests. We have asked literally dozens of Contractors who have inquired about commercial experience the same question of "how" do we independently validate commercial past performance responses to overcome this potential bias and not a single one of them have been able to provide us with an answer. So I pose the question to you as well... Please tell us how to overcome this. We will not base awards of Government contracts on information that may be biased due to financial interest or business relationship. Until we find a way to overcome this, commercial past performance shall remain worth significantly less than Government past performance.</p>
252		<p>Allow scoring for past performance evaluations for work performed by contractors on state and local government work to be equal to scoring values ascribed to federal work.</p>
		<p>As with the evaluations for commercial work, we encourage GSA to prescribe scoring values for past performance evaluations of state and local government work that are equal to the scoring values for federal government work.</p> <p>Contractors often conduct integrated services work on behalf of state and local entities. Such work is often similar in scope and/or complexity to federal government requirements and even awarded as an authorized purchaser under selected GSA schedules. In addition, a number of state and local entities retain past performance evaluations similar to the evaluations retained by the federal government. Hence, through due diligence and solid market research, GSA can and should be able to get accurate and comprehensive feedback on contractors' past performance from such states or municipalities. As with the question of scoring for commercial past performance, GSA's source selection criteria should be grounded in what will result in the best and most innovative outcomes for future customer agencies. Maximum competition clearly offers the best chance for identifying the best solutions for future requirements.</p>
		<p>RESPONSE: Thank you for the recommendation. We will take it under consideration.</p>
253		<p>Revise the CAS compliance requirement to provide that offerors who do not have CAS-covered systems will not be excluded from the initial award phase but will be ineligible to compete for task orders that require such systems.</p>
		<p>The draft RFP requires all offerors to certify that the firm is in compliance with the Cost Accounting Standards and thus eligible for the award of cost-type contracts. Yet GSA acknowledges that the preponderance of orders likely to be received will be fixed price, not cost reimbursement and will not require companies to accumulate costs or comply with the Cost Accounting Standards for those orders. The current requirement will have a significant adverse competitive effect on smaller firms and companies who engage successfully in the federal market on a fixed price basis, such as many of the firms on the GSA schedules today. While ordering agencies may choose to use (or may need) a cost reimbursement model for future orders, there is no reason to make such a requirement a qualification for award of the base OASIS contract. Should an ordering agency require compliance with the Cost Accounting Standards for any particular order, such a requirement can, and properly would, be a qualification threshold for competing on that particular order and we understand that firms that lack such CAS compliance would be ineligible to bid. But we see that circumstance as far preferable to excluding all such firms from an OASIS award when such CAS compliance is not anticipated to be a significant</p>
		<p>RESPONSE: Our research indicates that Cost Reimbursement is the most utilized contract type for these types of services. If implemented, this recommendation would mean that there would be limited competition for Cost Reimbursement task orders. This is not acceptable to us and we do not share the opinion that it is preferable to include Contractors who cannot compete for Cost Reimbursable work than to exclude them in favor of those who can. If a contract allows for Cost Reimbursement contract type, then it is a perfectly legitimate requirement for the Government to require adequate accounting systems and where applicable, CAS. This has been successfully defended before.</p>
254		<p>Remove certain system, certification, and resource requirements from the initial contract formation evaluation criteria and apply them at the task order level as needed.</p>
		<p>The draft solicitation provides that "adequate price competition at the task order level, in response to an individual requirement, establishes the most accurate, fair, and reasonable pricing for that requirement." This was reiterated in a March 7, 2013 OASIS blog post in which GSA wrote: "When we speak of price savings, the core strategy is based on effective competition at the task order level. This is the single most important factor for establishing the best pricing possible for complex requirements." We concur. It supports our comment above relating to eliminating the mandate for compliance with CAS at the OASIS contract formation level and driving as many of those specialized elements to the ordering level.</p>
		<p>Similarly, if maximum effective competition at the order level is the priority, why are there numerous past performance requirements and scoring point values at the OASIS contract formation level that would have little or no relevance for most of the task orders expected under the contract?</p> <p>For example, one has to prove employees have facilities clearances even though many of the orders will be for unclassified work. Other examples of the incongruity of the basic OASIS requirement include providing additional evaluation points for Earned Value Management System (EVMS) certifications for work in which EVMS is unnecessary or inapplicable to the performance of agency orders and having an AS9100 certification requirements for non-aerospace industry work. We strongly support the goal of not overly burdening the contracting agencies' procurement process or workforce. But that goal can be best met by providing the procuring agencies with information about individual contractor certifications obtained post award. The contracting agencies should consider this information when determining whether to use OASIS or when establishing requirements or a scoring system for task orders.</p>

		<p>Our approach would provide the ordering agencies more flexibility of when (and when not to) establish requirements and developing scoring criteria for orders that are most relevant to the specific order.</p> <p>Furthermore, the draft solicitation unnecessarily requires certifications to be held in the specific name of the offeror, thus limiting contractors' and the government's ability to rely on certifications held by a contractor's affiliate. We understand GSA's objective is to ensure that if a certification is to be scored there must be a reasonable expectation that the certification will benefit performance on OASIS. There is, however, an approach that will inject greater flexibility into the certification requirements while also ensuring GSA's objectives are met. Such an approach would permit certifications to be held by an offeror's affiliate with the technical expertise provided that the affiliate will be fulfilling the specific activity requiring the certification as part of the integrated performance on an OASIS task order. GSA could require meaningful relationship documentation to substantiate why and how the certifications held by affiliates or subsidiaries would be used in OASIS.</p>
		<p>RESPONSE: You are 100% correct that all systems, certifications, and other evaluation elements do not apply to all potential OASIS task orders. They aren't intended to. They are present to allow differing companies with differing core competencies in different fields to be able to compete for an OASIS award. Your recommendation to remove items offers no recommendation of how to distinguish between Offerors. Unlike private industry, we cannot simply choose whatever company we want and move forward. There is no detailed requirement until a task order is present. There is no realistic price or cost until a task order is present. So what do you recommend we do to distinguish between Offerors? We took the approach, based on market research we conducted, that a reasonable approach to this would be to examine past performance, measure the relevance and complexity of an Offerors experience, and examine the systems, certifications, and resources that might be required in performance of task orders. If you looking at Government spending in the professional services area, it indicates that most of our clients, and most of our task orders, will support the Department of Defense. <u>The systems in our evaluation schema are important to them.</u></p>
255		<p>Inject flexibility by clarifying that a specific certification or an equivalent certification is acceptable.</p>
		<p>The draft solicitation encourages contractors to have a myriad of certifications including ISO 9001:2008, AS9100, and Capability Maturity Model Integration (CMMI) Level 3 or higher. PSC recognizes that certain task orders may require such certifications. However, AS9100 and CMMI are not the only widely accepted standards in their respective areas and yet the draft solicitation places the full burden on the offeror to justify how and why an alternative quality standard is adequate. For nearly 20 years the government has sought to avoid placing such certification requirements on contracts, recognizing that no one certification is used universally. As such, it should be incumbent on the GSA source selection team to conduct the necessary market research that will avail them of the necessary insight into and understanding of other equivalent certification standards. Moreover, because few, and certainly not all, orders placed through OASIS will require such standards, we again make the case that any such certifications should only be required at the task order competition level.</p>
		<p>RESPONSE: RFI stands for Request for Information. This is market research. We are asking for equivalent certifications or other certifications we might have missed. Please provide these to us. The certifications we currently have were provided by Industry in our early market research. None of the certifications in our scoring matrix are mandatory or required. They serve to help distinguish between Offerors.</p>
255		<p>Permit third-party audit approval of an acceptable accounting system for an offeror.</p>
		<p>During broadly attended events with industry, GSA has indicated that it is revisiting the requirement that contractors provide verification from the Defense Contract Audit Agency (DCAA), Defense Contract Management Agency (DCMA), or any civilian agency audit authority of an accounting system that has been audited and deemed adequate for the accumulation and reporting of costs. GSA has suggested that it may consider changing the requirement so that approved third-party audits will be considered an acceptable approval of a contractor's accounting system. PSC strongly agrees with such an approach and believes it is essential to include that change in the final RFP.</p> <p>The federal audit agencies play an important and valued role. However, by any measure, they acknowledge that they have been unable to maintain pace with the demand. In fact, DCAA has acknowledged that their current delays in reviewing contractor accounting systems could grow longer. As such, it is imperative that alternative approval methods be allowed and fully recognized. Many civilian agencies have successfully used third-party firms for auditing and validating contractor systems and we believe it is a viable alternative that should be</p>
		<p>RESPONSE: We have already implemented this recommendation.</p>
256	L.5.3.1, Relevant Experience Minimum Requirements, p. 80	<p>L.5.3.1 Relevant Experience Minimum Requirements: The first minimum requirement states that "The primary scope of work must be one of the Six OASIS Core disciplines." The government has stated the purpose of this in the answer to Question 348, Q&A Clarifications "Relevant experience examples must be on a requirement that could have been performed on the OASIS contracts." On large task orders (hypothetically > \$50 Million in total value), work in the any of the Six OASIS core disciplines approaching, for example, 20% (or \$10 Million in OASIS core work) certainly meets the government purpose of ensuring the contractor can perform on OASIS. In these cases, although not primary (>50%), the work can be characterized as substantial for evaluation. This is further illustrated as 20% of a large relevant experience is more work in OASIS core areas than 50% of a small relevant experience. We recommend changing the "Primary Scope of work" to a "significant scope of work." To ensure the significance of the work, the requirement could be 50% of the value in L.5.3.1 item 3, award value.</p>
		<p>RESPONSE: We respectfully disagree with your position, but thank you for the recommendation.</p>
257		<p>1. Reference Section L.5.3.1 - Will the Government consider changing the minimum past performance requirements to allow offerors to demonstrate that they have performed a minimum of 5 projects within the 4 out of the 6 OASIS Core Disciplines, rather than requiring that each of the 5 projects included work within 4 out of the 6 OASIS Core Disciplines? Requiring a minimum of 5 projects within the 4 out of the 6 OASIS Core Disciplines, regardless of contract type, will more clearly demonstrate offerors proficiency and expertise in many or all of the Core OASIS Disciplines. Further, the 6 Core OASIS Disciplines are diverse and it would therefore likely be difficult for potential large and small business offerors to identify 5 projects which cover at least 4 of the 6 OASIS Core Disciplines.</p>
		<p>RESPONSE: We are unlikely to do that, but will take it under consideration.</p>

258		2. Reference Section L.5.3.2 – Suggest the removal of the requirement to provide supporting documentation with Attachment J.5, as non-federal Government contracts often contain proprietary information which the applicable customer will not agree to disclose to 3 rd parties.
		RESPONSE: If we cannot validate information, we shall not give credit for it.
259	Reference page 80, Section L.5.3.1. Relevant Experience Minimum Requirements, Paragraph 1, items 2 and 3:	1. Spanning 3 Core Disciplines is difficult for a small business concern within the size ratings given. Would you reconsider a minimum of 1 Core Discipline as adequate?
		RESPONSE: No. Please see previous responses to similar recommendations.
260	L.5	Since small businesses do not often have substantial prime experience and do not have past performance with large-value contracts, many or most may have trouble meeting this requirement. For Pools 1 and 4, would the Government modify the requirement by: Reducing the number of required Past Performance references to three; and Allowing the Past Performance references to have been performed as a prime or as a principal subcontractor; and For ongoing Past Performance references, reducing the minimum length of performance from one year to six months.
		RESPONSE: Please see previous responses to similar recommendations.
261		We believe that GSA should incorporate a qualitative assessment of the bidders. The qualitative assessment should be more important than the quantitative assessment.
		RESPONSE: We do not understand the recommendation. Please provide specifics.
262		<input type="checkbox"/> The most important criteria for this contract should be innovation and quality. That is what Government customers care about most today, particularly on requirements that have a high level of complexity. There should be a rigorous qualitative evaluation done by the Government to actually assess the contractor's performance relative to the competition in these areas. We recommend using real past performance write-ups, submitted for confirmation to Government clients, for this purpose.
		RESPONSE: We do not understand the recommendation. Please provide specifics.
263		<input type="checkbox"/> Remove all hard requirements (DCAA audited accounting system, past performance size, etc.)
		RESPONSE: Please see previous responses to similar recommendations.
264		<input type="checkbox"/> A possible scoring mix for evaluation purposes might look something like this: 50% qualitative (PP, personnel, etc), 30% quantitative (accounting system, purchasing, etc), and 20% price.
		RESPONSE: Thank you for the recommendation, but we do not score price nor are we conducting a trade off analysis.
265		CMMI ML2 appraisal offers companies improved quality of service for their clients/customers. CMMI ML2 also reduces the chance for project failure. Small businesses invest significant resources to get and sustain this appraisal. Would GSA OASIS be willing to offer evaluation points for CMMI ML2 (as it has indicated it would for CMMI 3, 4, and 5)?
		RESPONSE: Please see previous responses to similar recommendations.
266		The relevant experience minimum requirements in Section L.5.3.1 exclude a fair number of small businesses who possess the ability to provide innovative, cost effective services to the most demanding challenges facing its intended customers from bidding as primes on OASIS. In fact, it seems to give preference to those that have moderately large prime contract efforts when it is likely that a smaller number of inventive, skilled consultants might have been sufficient. Requiring multiple prime contract awards of \$2M/year each, totaling at a minimum of \$10M over the five preceding years and at least one cost reimbursable contract may have the effect of limiting the pool of respondents, but not necessarily yield the broad set of innovative, cost-effective providers that the government is seeking. Would the government reconsider the minimum requirements so that businesses with fewer than 5 distinct prime contracts at \$2M per year over the five year period qualify as Primes?
		RESPONSE: Please see the changes made and previous responses to similar questions.
267	L.5.3.1	Suggest a decrease to the total award value from at least (5) Million per year to (3) Million per year.
		RESPONSE: Thank you for the recommendation, but we are unlikely to incorporate it.
268	L.5.3.1	Suggest a change in the number of projects that are work for the Federal Government from (3) to (1).
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
269	L.5.3.1, p. 85	We recommend further review of the Government's position (Clarification #243) that task orders rather than contracts are considered as individual projects for Relevant Experience and Past Performance. We believe that contracts with multiple, continuous task orders delivered to the same customer and CO demonstrate precisely the kind of complex integration experience across the OASIS core functional areas that GSA has stated repeatedly they want to see as experience. Individual task orders are often focused solely on a single core discipline and it is the Offeror's IDIQ-level program office that integrates tasks across all disciplines. Breaking down the overall contract into individual task orders dilutes the significance of a \$100M professional services contract, making it equivalent with less complex, small contracts that are much less representative of a company's experience. Moreover, many Government customers purchase services using separate task orders as a way to meter out their budget as requirements dictate for a single, complex integrated solution. In essence, companies that handle large, complex efforts that are contracted out in smaller, mission-oriented task orders will be penalized by this current GSA approach. We recommend that IDIQ contracts and other task order-based
		RESPONSE: Please see previous responses to similar recommendations.
270	J.5.	We recommend that GSA reconsider defining Multiple Locations as two or more metropolitan areas. Particularly in the Washington, DC area, but in other major metropolitan areas as well, projects frequently have staff located at multiple government and contractor locations across a single metropolitan area. Distributed operations within a contiguous metropolitan area (e.g., Los Angeles or Washington, DC) involves similar levels of management and technical complexity as having staff and operations in widely separated cities.
		RESPONSE: Thank you for the recommendation, but we are unlikely to incorporate it.
271	C.3.1	Suggest making IT services a Core Discipline area versus only mentioned in the Ancillary Support Services.
		RESPONSE: Please see previous responses to similar recommendations.

272	F.3	Suggest that the contract duration be evergreen with a renewal every (5) years - similar to the Schedule contract vehicles. RESPONSE: Thank you for the recommendation, but we are unlikely to incorporate it.
273	H.11	Suggest that On-Ramping be formalized and scheduled as part of the contract. RESPONSE: Thank you for the recommendation. We will take it under consideration.
274	H.13	Suggest that Off-Ramping be formalized and scheduled as part of the contract. RESPONSE: Thank you for the recommendation, but we are unlikely to incorporate it.
275	L.5.3.1	Suggest a change in the number distinct projects from (5) to (3). RESPONSE: Thank you for the recommendation, but we are unlikely to incorporate it.
276	L.5.3.1	Suggest a change to the number of core discipline area that the work is performed in or integrates from (4) to (2). RESPONSE: Thank you for the recommendation, but we are unlikely to incorporate it.
277	L5.5.11	Will the government entertain the notion of substitutions for the requirements for the Corporate OASIS Contracts Manager (COCM) and the Corporate OASIS Program Manager (COPM). For example, there could be a year's experience equivalency developed (e.g. 4-year's experience) for either degree requirements like we see in many DoD contracts as well as specific Program and/or Contracting experience. Recommend that the government consider inserting equivalencies into the COCM and COPM key personnel position requirements. RESPONSE: We are considering it now.
278	B.1.5	Suggest having a staggered Contract Access Fee depending on the level of effort required by the procuring agency. RESPONSE: Thank you for the recommendation. We will take it under consideration.
279	C.2.1	Suggest mapping the NAICS codes to Core Discipline areas. RESPONSE: The core disciplines span into every NAICS code.
280	L.5.3.1, Page 85	Would the Government consider allowing offerors to submit relevant experience gained as a subcontractor if such experience clearly maps to 4 or more of the 6 OASIS core disciplines and meets the \$5M per year threshold? RESPONSE: Please see previous responses to similar questions.
281	L.5.3 - Relevant Experience (80)	From the perspective of a small business, with less than 500 employees, we find Requirement #5 limiting our ability to participate as a prime. Is there any possibility that this requirement could be eliminated or expanded to include time & materials contracts. Our company has an adequate accounting system which is DCAA approved. RESPONSE: Please see the changes made and previous responses to similar recommendations.
282	Section H.6.9, Page 45	Having an Earned Value Management System be worth 100 points seems like an unfair advantage to existing CTAs (that may include large businesses) because most small businesses under \$25M will not have a formal, certified EVMS. To ensure that highly qualified firms that have yet to be certified because of lack of attention from DCMA are considered for award, we recommend that GSA allow Offerors to self validate their systems for EVM compliance and receive the full 100 point credit. Treasury TIPSS-4 (a large, successful IDIQ Program) successfully did this using the following language in the RFP: "The offeror shall submit self-validation documentation in accordance with the Section K Representation and Certification entitled, "Earned Value Management System Compliance – Self Validation" that their system can apply EVM compliance with American National Standards Institute/Electronics Industries Alliance (ANSI/EIA) Standards in accordance with the Core Criteria in Section J.14 [included 10 criteria derived from ANSI Standard 748]". We recommend that GSA take a similar approach and allow Offerors to self validate for the same amount of points given in the Score Card for an EVMS. RESPONSE: Please see previous responses to similar recommendations.
283	Section L.4, Page 77	Clafication question #37 confirms that GSA wants the Cost/Price Rationale file in Excel format. Since the rationale discussion will be narrative text, we recommend that the Cost/Price Rationale file be submitted as PDF (.pdf) so that Offerors can create it in Microsoft Word (and convert to PDF), allowing for ease of formatting and, ultimately, readability for GSA. RESPONSE: Thank you for the recommendation. We will take it under consideration.
284	Section M.5, Page 95	An approved purchasing system is worth 500 points according to the Scoring System in Section M.5. While Section H.6.5 requirements state that "Contractors are encouraged to have a purchasing system approved by the DCMA..." as opposed to it being required, having the approved system be worth 500 points seems like an unfair advantage for existing CTAs (organized as a Joint Venture that may include large businesses) because most small businesses under \$25M will not have an approved purchasing system. This rationale is consistent with FAR 44.302(a), which states in part, "If a contractor's sales to the Government (excluding competitively awarded firm-fixed-price and competitively awarded fixed-price with economic price adjustment contracts and sales of commercial items pursuant to Part 12) are expected to exceed \$25 million during the next 12 months, perform a review to determine if a CPSR is needed." In order to ensure that purchasing systems are evaluated among small businesses, and to avoid a CTA (that includes a large business) having an unfair advantage that results in a CTA scoring more points than a non-CTA small business, we recommend that the approved purchasing system must be for the small business managing partner in a CTA in order to receive the 500 points. RESPONSE: Please see previous responses to similar recommendations.
285	Section M.5, Page 95	An approved purchasing system is worth 500 points according to the Scoring System in Section M.5. While Section H.6.5 requirements state that "Contractors are encouraged to have a purchasing system approved by the DCMA..." as opposed to it being required, having the approved system be worth 500 points is not relevant for Pools 1 and 2 because most small businesses under \$25M will not have an approved purchasing system. This rationale is consistent with FAR 44.302(a), which states in part "If a contractor's sales to the Government (excluding competitively awarded firm-fixed-price and competitively awarded fixed-price with economic price adjustment contracts and sales of commercial items pursuant to Part 12) are expected to exceed \$25 million during the next 12 months, perform a review to determine if a CPSR is needed." We believe that it is unrealistic to have a CPSR requirement, which is based on \$25M in future sales, apply to Pools 1 and 2 since their revenue amounts are \$14M and \$19M respectively. We believe that companies with revenue approaching \$100M are not considered for CPSR. Therefore, we recommend that the encouragement to have a purchasing system approved by DCMA be removed from Pools 1 and 2 in accordance with FAR 44.302(a) and because of the RESPONSE: Please see previous responses to similar recommendations.

286	Section H.4.2.1, Page 40	<p>Would GSA consider consolidating Pools 1 and 2 so that the Business Size Standard for the "new" Pool 1 would be \$19M instead of \$14M? Making this change would likely result in more experienced companies creating task solutions and yield better task competition for Pool 1. Additionally, the fewer the number of Pools, the more efficient the acquisition task for potential Contracting Officers.</p> <p>RESPONSE: We do not determine size standards and cannot alter size standards.</p>
287	Section L.5.3.1, Page 80	<p>We recommend that GSA allow Offerors to use IDIQ and BPA contracts for Relevant Experience/Past Performance. Limited funds sometimes drive acquisition strategies for complex integrated work efforts where task orders are issued for each person working under the IDIQ or BPA, with periods of performance lasting one year or less. These multiple task orders may also have the same scope, but with performance in various locations. Consecutive task orders may also be issued for the same work with the same client (follow-on task order), but for short durations due to budget uncertainties. Our company has a few of these such contracts, one in particular with GSA.</p> <p>RESPONSE: Thank you for the recommendation. We will take it under consideration.</p>
288	M.5, page 100 L.5.3.1, page 85	<p>Relevant Experience Minimum Requirements: Limiting acceptable examples to either a single funded contract or to a single TO under an IDIQ limits the number of offerors who will meet the dollar thresholds, thus making it more difficult, not less, for the government to achieve its goal of a broad base of a large number of Primes on OASIS.</p> <p>For example, our company operates several competitively-won single-award complex major programs for DOD clients that are structurally IDIQs, but that emphasize performing multiple serial and parallel tasks all geared toward achieving the program goals. The requirements of all of these programs cover multiple disciplines, and contain significant IT components, program management, consulting, logistics, engineering services, and more. We typically analyze and reconcile the needs of multiple stakeholders and integrate the efforts of multiple teammates to achieve overall program goals. All of these directly relate to OASIS requirements.</p> <p>However, none of these tasks qualify for "bonus" points under the current evaluation criteria based on size, even though most involve four or more Core Disciplines and in the aggregate clearly demonstrate not only our expertise in the Core Disciplines but also far exceed the \$50M threshold.</p> <p>We believe that successful execution of such programs clearly indicate high potential for success in executing projects under OASIS.</p> <p>RESPONSE: We are considering the Single Award IDIQ scenario as an acceptable relevant experience example, but have not made a final decision on this yet.</p>
289	M.5, page 100	<p>Relevant Experience Scoring: The current selection of "Top 40" in each Pool seems to us to favor large companies that have large funded awards or large Task Order awards. In order to maximize the breadth of Primes and to "level the playing field," we suggest that selection be based on some "threshold" level of points, set low enough to enable a wider range of Primes to be selected. Alternately, consider scoring only the "top 2" or "top 3" Relevant Experience examples, which would minimize the possibility of large companies that have 5 examples all of which score bonus points from dominating the winning Prime field.</p> <p>RESPONSE: Thank you for the recommendation. We will take it under consideration.</p>
290	M.5 page 100	<p>Classes of Primes: We are a non-profit mid-sized Prime contractor, a status which many of our clients find valuable in that they are assured of unbiased results. Would the Government consider adding a third classification or sub-classification of "Non-Profit Prime" offeror?</p> <p>RESPONSE: Thank you for the recommendation. We will take it under consideration.</p>
291	L.5.3.1, page 85	<p>This section requires that each of the five selected projects must involve the performance and/or integration of at least four of the six OASIS core disciplines. Inasmuch as many of the task orders that will be issued under this multi-award contract will involve only one of the core disciplines, this seems like an unusually burdensome requirement in the RFP. We strongly encourage that this requirement be eliminated.</p> <p>RESPONSE: We respectfully disagree with your position, but thank you for the feedback.</p>
292	H.6.7, page 45	<p>This section encourages that contractors who desire to compete for work within the aerospace industry are encouraged to have the AS9100 certification. It does not seem that the work on the OASIS contract will be associated with the <u>manufacture of aerospace hardware</u> and thus AS9100 is not germane. We strongly encourage this requirement be lifted from the overall OASIS contract and only be used as a differentiator at the task order level when applicable. We also strongly encourage that it be removed from the scoring criteria in section M.5.</p> <p>RESPONSE: Please see previous responses to similar recommendations.</p>
293	H.6.8, page 45	<p>This section encourages the contractor to have a CMMI Maturity Level 3 or higher program in place; however, the vast majority of what is required in the statement of work does not require use of CMMI procedures since the vast majority of the work is to provide "services" to support Government activities - not to deliver a final hardware or software product, which is where the CMMI procedures would be of most value. We strongly encourage them to remove this unnecessary (and costly) requirement from the RFP.</p> <p>RESPONSE: Please see previous responses to similar recommendations.</p>
294	H.6.9, page 45-46	<p>This section encourages a contractor to have an EVMS ANSI/EA Standard-748; however, the vast majority of what is required in the statement of work does not require the application of an EVMS since the vast majority of the work is to provide "services" to support Government activities - not to deliver a final hardware or software product, which is where an EVMS is of use. We strongly encourage them to remove this unnecessary (and costly) requirement from the RFP.</p> <p>RESPONSE: Please see previous responses to similar recommendations.</p>
295	Section M.4.4.1, p. 98-99	<p>Suggest that GSA consider Award Fee scores/ letters as an alternative to CPARs to evaluate past performance when CPARS are unavailable for a specific project.</p> <p>RESPONSE: Thank you for the recommendation. We will take it under consideration.</p>

296	Section M.4.5.3, M.4.5.4 and M.5, p. 100 and 101; L.5.5.11.1 and L5.5.11.2, p. 91 and 92.	The evaluation methodology/criteria for key personnel essentially limits/excludes acquisition management professionals who do not have a masters degree by awarding additional points for such a degree. In order to provide flexibility and access to seasoned professionals across the private sector, we recommend revising the criteria regarding masters degree. In addition, the 15 years experience also further limits access to potential successful/exceptional managers. This is important because the evaluation drives an offeror to achieve maximum points--and as a result, the unintended consequence will be to limit the pool of potential contract managers. In addition, specific certification/accreditation entities are called out, recommend allowing "or equivalent" with supporting documentation.
		RESPONSE: Thank you for the recommendation. We will take it under consideration. However, we must clarify that points is not "exclusion" factor. Only pass/fail criteria can exclude an Offeror from consideration. Points only distinguish between Offerors.
297	Section M.5, p. 100	Are the resumes for the COPM and COCM intended to be the supporting documentation that will substantiate that any PMI and NCMA certifications are held by the candidates? Recommend providing for equivalent certifications to expand the pool of candidates. The current structure unnecessarily limits availability of otherwise qualified professionals.
		RESPONSE: Thank you for the recommendation. We will take it under consideration. Please provide what you consider "equivalent" certifications.
298	Section L.5.5.11.1, p. 91; M.5, p.101	Current scoring emphasizes PMP over experience. Recommend more emphasis on experience. Experience in managing large multiple-agency or agency-wide MA-IDIQ programs is more important than a PMP certification or Masters Degree that might only be a week old. <ul style="list-style-type: none"> • Recommend scoring years of experience significantly higher than other COPM factors or focus COPM rating on years of experience exclusively. • Additionally, recommend that the government consider total years of experience in program/project performance and management of contracts and task orders encompassing at a minimum 2 of the disciplines supported under OASIS, with more points assigned if management experience and past performance covers more than 2. • Recommend that the requirement be modified for the Masters Degree in Program/Project management or Core Discipline under OASIS. These requirements are more appropriately required at the task order level. Suggest that the requirement and scoring be revised to consider years of experience in providing core discipline technical services to the government as a substitute for the Masters Degree. • Recommend that the requirement for a PMP is more appropriate at the task order level, and recommend that it not be a scoring factor for the OASIS master contract vehicle. Successfully managing a government-wide
		RESPONSE: Thank you for the recommendations. We will take them under consideration.
299	Section L6. Volume 6 – Cost/Price, p. 92	Junior, Journeyman and Senior Labor Categories all have years of experience and degree requirements. Junior labor category requires up to 3 years of experience and a BA/BS degree. Journeyman labor category requires 3-10 years of experience and a BA/BS or MA/MS degree. Senior labor category requires over 10 years of experience and a MA/MS degree. Degree requirements are overstated and should include years of experience equivalency for the various degree requirements. Such stringent degree requirements typically impact the hiring of certain groups within the workplace such as veterans with significant experience but no degree. Years of experience requirements for labor categories are typically expressed in terms of the minimum experience required instead of "up-to" or a range.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
300	Section L.5.4.1, p. 86	Recommend including some flexibility in the use of PPIRS and CPARS (including subsystems, such as ACASS) and allow electronic versions of hard copies of finalized assessments that the government staff may not yet have loaded to the system. We recognize that contractors have every opportunity to encourage our government customers to ensure updating CPARS for those past performances and experiences we may cite. Contractors cannot control when a government official uploads evaluations to the CPARS system, which then reports in PPIRS. Additionally, subsystems may not have been integrated into CPARS or PPIRS that contain equivalent objective contractor evaluations completed by DoD, federal and civilian government staff. GSA should consider these subsystems by accommodating submission of electronic versions of hard copies for validation under the source selection. An example of this subsystem is the ACASS system for DISA.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
301	Section L.5.4.3, page 87	We appreciate the fact that the scoring criteria in OASIS Unrestricted rewards those companies that helped small businesses by meeting or exceeding their contracts' small business goals. Recently graduated small businesses, however, may be overly penalized for making the transition from small to large business in the draft solicitation. With the most recent adjustments, the scoring for small business goals and all the socioeconomic subgoals allocates up to 1500 points (22%) for which many graduated small business (now large) bidders often are not eligible to earn. Therefore, we suggest lowering the allocation to 50 points for meeting the Total Small Business Goal on each referenced contract or an additional 10 points for each contract meeting each of the socio-economic categories for a total of 500 (9%) available points related to Small Business Goals.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
302	Section L.5.3.2.3, p. 86	The requirements under this section include the submittal of a Contract Award Form identifying the Contract/Order Number and Offeror's name as the Prime Contract Awardee. The indication at Section L.3 is that GSA will consider affiliates, internal divisions, and subsidiaries of an Offeror, only if the Parent Company is the official legal bidding entity on the SF 33. To remain consistent would recommend revising the language at L.5.3.2.3 to indicate Offeror's name (or affiliates, internal divisions, and subsidiaries of the Offeror) as the Prime Contract Awardee.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.

303	Section L.2.3, M.2, p. 74, 95	<p>This section states that the Government intends to establish a Multiple Award IDIQ Contract that consists of 6 separate Pools of Contractors based upon size standards and 40 contract awards for each Pool. A single Contractor may compete for more than one Pool.</p> <p>This might be interpreted that separate awards to a single contractor for each pool are to be made; whereas, we believe the intent is to make a single award to each contractor with the awarded pool(s) identified within that contract award.</p> <p>This section might also be revised to state that the Pools are only being utilized for the purposes of determining size status. The practical effect being that awardees on the unrestricted solicitation would receive an award with all six pools, and awardees on OASIS SB would only receive those pools for which they qualify as being small.</p>
		RESPONSE: Your understanding of the intent is correct. We will attempt to clarify the language to make it clear that Pools are solely based upon size standard.
304	Section L.3 Instructions, p. 75	<p>Draft indicates that GSA is considering the affiliates, internal divisions and subsidiaries of an Offeror only if the Parent Company is the official bidding entity on the SF 33. Further, for Systems, Certifications and Resources, the proposal submission must be in the legal bidding entities name as identified on the SF 33.</p> <p>Corporate structures can be complex. It is not uncommon for corporate systems to support the legal bidding entity identified on the SF 33 along with other corporate entities. In such a case the legal bidding entity would not be the same as identified on the SF 33. This could have unintended consequences without merit. We understand GSA has stated that it will be revising this section to provide greater flexibility for offerors with differing corporate structures. This should include the experience, projects/past performance and certifications as well. We look forward to the revisions and recommend that GSA provide an opportunity to comment further.</p>
		RESPONSE: Thank you for the feedback. The opportunity to comment continues until the day proposals are due.
305	Section L.3 Instructions, p. 75	<p>In addition, GSA should further explain/address the prohibition on joint ventures and teaming arrangements, especially for OASIS SB. Teaming arrangements and joint ventures are powerful tools to enhance competition, access sophisticated services as well as promotion of small business concerns.</p>
		RESPONSE: Your opinion is shared by some, but it is certainly not a universal position. This is especially true with our clients. Please see the previous responses in this area.
306	Section H.9.3, p. 51	<p>Rather than identifying/highlighting one specific remedial act that a contracting officer may take (requiring the contractor to sign an OCI statement), we recommend emphasizing/reiterating the FAR OCI guidance as a whole in setting the framework for mitigating potential conflicts. In addition, there will often be agency-specific supplemental OCI guidance.</p>
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
307	Section H.12, p. 54	<p>The approach of placing contractors into a "Dormant Status" introduces a new classification which is not currently supported by law and regulation. While the importance of remaining compliant and delivering quality services is incumbent upon any successful contractor, there may be unintended consequences of utilizing a new mechanism such as placing contractors into a dormant status. As an alternative, the use of CPARs to record any performance issues that might be a consideration on receipt of future awards would seem to be an approach for consideration. The dormant process creates an unnecessary level of complexity in the OASIS program. Traditional tools such as the unilateral right to exercise options, or exercise of partial options already exist. The number of awards needed to avoid dormant status, given the number of task orders over the first contract period, appears unrealistic. This is a significant issue as "dormant" status does not appear to be temporary and the criteria/process is subjective. Moreover, the issuance of a final decision imposing "dormant status" on a contractor by the OASIS contracting officer is akin to a termination for default and can be appealed to the civilian board of contract appeals or the Court. The FAR and FAR clauses provide sufficient mechanisms to address the concerns that the "dormant" process seeks to address. We strongly recommend utilizing pre-existing FAR-based mechanisms.</p>
		RESPONSE: Contractors still have the appeals process available to them. Dormant status is not intended to be permanent. It wouldn't be necessary if it were. Actually, we don't ever anticipate actually utilizing Dormant Status, but reserve the right to to if necessary. Dormant status provides a step between "termination" and "nothing". This issue has been extremely popular with our clients. While it may not be specifically authorized by regulation or law, it is also not specifically forbidden by regulation or law. In accordance with FAR 1.102, "if a specific strategy, practice, policy or procedure is in the best interests of the Government and is not addressed in the FAR, nor prohibited by law (statute or case law), Executive order or other regulation, that the strategy, practice, policy or procedure is a permissible exercise of authority". It is simply a term and condition of the contract. If anyone knows of any incidence where something equivalent to Dormant Status is prohibited, please let us know.
308	Section J.1., Attachment 1, p.62	<p>Please clarify the subject matter expert category--is there a category for each of the disciplines? Recommend clearly providing subject matter experts for each of the core disciplines.</p>
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
309	Section H.6.12, p 48	<p>This section should be clarified. Competitive solutions proposed by contractor in response to a government requirement reflect commercially sensitive, proprietary approaches. As such, the technical solutions will be marked as proprietary in almost all instances. Recommend leaving this issue to the holder of the requirement who issues a task order under the contract.</p>
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
310	Section H.6.13, p48	<p>Recommend this requirement be left to the discretion of the ordering activity--can be addressed as a term of a task order if necessary.</p>
		RESPONSE: This may also apply to the master contract itself. We doubt that would ever be necessary, but it could happen.
311	Section H.6.14, p. 48 (Small Business)	<p>In order to meet the spirit of the Government's Small business subcontracting efforts, we recommend that 50% of the cost of the task order performance be incurred for personnel by a small business OASIS SB Prime contractor or a SB subcontractor.</p>
		RESPONSE: Thank you for the recommendation. We will take it under consideration.

312	Section H.4.2.1 NAICs Pools, p. 40 and Section M.2 Basis of Award, p 95.	<p>We strongly recommend eliminating or simplifying the 6 NAICs Pools on OASIS Unrestricted. Under OASIS Unrestricted the "pool" structure articulated in Section H and Section M is unnecessary and confusing. Moreover, in light of communications and statements by GSA representatives indicating the intent to award 40 contracts, plus ties, (contracts that subsequently will compete across all NAICs codes identified within the scope of the contract) the current NAICs code structure is not relevant to the Section M evaluation and award process. The draft solicitation states the following at M.2: "The Government intends to make 40 awards in each OASIS Pool resulting from this solicitation." This statement is clear. It says that GSA intends to award up to 240 contracts, plus ties, across the six pools. However, in discussions with GSA regarding the pools, we have learned that the actual intent is to award only 40 contracts, plus ties and that all 40 contractors would then be able to compete across all the NAICs codes referenced in the contracts/solicitation. As such, the six pools are not relevant to Basis of Award outlined in Section M and should be eliminated in order to clarify the award process. The six pools also are not necessary for the task order process. Under the proposed SBA rule that has been identified as the impetus for the pool structure, contracting officers will assign the appropriate NAICs to each task order based on the predominant task work to be performed. The NAICs pools are not necessary and do not add to the ease of use of the task order process under OASIS Unrestricted. Moreover, the pools send a mixed message regarding the acquisition strategy for OASIS Unrestricted. The pools indicate that task orders will be narrow and segmented functional work rather than integrated, complex total solutions.</p>
RESPONSE: Please see previous responses to similar recommendations.		
313	Section H. 6, p. 42 and Section M.4.5, p. 99.	<p>This section indicates that all Systems, Compliances, and Certifications shall be in the Contractor's official legal name as identified on the OASIS award document. Systems, Compliances, and/or Certifications from a Subsidiary and/or Affiliate of the Contractor will not be considered. The revised language at L.3 indicates that a "meaningful relationship" and "commitment letter" approach will be utilized. Given the changes at L.3 it would seem that associated edits to H.6 would also be required. Further, we would also request that Systems, Compliances, and/or Certifications issued to the parent of an offeror company and which apply to its affiliates and/or subsidiaries also be considered acceptable for the submittal of any supporting documentation. With regard to the Section M evaluation of certifications, the available evaluation credit appears inconsistent with the overall scope of the OASIS acquisition (Unrestricted and SB). Credit is limited to certain specific functional areas which potentially limits competition and may unintentionally limit potential solutions at the task order level. Recommend reviewing the evaluation of certifications to ensure it meets the government's cross-cutting needs. Perhaps extend the potential credit across the various core disciplines. Also request a statement addressing the rationale for evaluating CMMI.</p>
RESPONSE: Please see previous responses to similar recommendations.		
314	Section G.3.1, p. 31	<p>This section states in part that on all task order solicitations, regardless of contract type, the Contractor shall include CAF in their cost or pricing proposals. In addition, 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). Given that CAF is not to be priced on the T&M/LH rates, would recommend addressing how CAF on T&M/LH orders should be addressed. While the OCO may have discretion in this regard, a separate CLIN for all CAF is preferred-- especially if a cap on CAF is part of the final RFP and resulting contract.</p>
RESPONSE: We shall be very specific about the application of CAF in upcoming language.		
315	Sections F.4.2, p. 25 and G.3.5, p. 36	<p>Recommend revising the close out timeframes for cost type contracts and time and materials/labor hour orders--given the great complexity of accounting for costs on such orders, the timeframe should be greater for such orders--which would be consistent with the FAR. In many cases close out is contingent on government action--such as rate settlements for indirect costs by the appropriate audit entity (DCAA). There are often backlogs regarding such settlements.</p>
RESPONSE: We are editing the language in this area.		
316	Sections B.2.1, p.11, B.5.1, p.13 Section J, Attachment 1, p1 and L.6, p. 86	<p>The labor category current structure is inconsistent with standard commercial and federal practice. This is an important ease of use concern for potential customer agencies. The current labor categories generally do not reflect those commonly used for professional services across the federal government. For example, there is no readily identifiable logistician category--which will be of particular concern to DoD customers. It appears that the labor categories are grouped by compensation rather than function. This will be confusing to customer agencies and make data collection and reporting more complex and costly. A more efficient and effective approach for both OASIS customers and contractors would be to group the labor categories by function. In addition, given the broad scope of OASIS, we recommend adding additional labor categories for more comprehensive footprint that better aligns with the core disciplines identified in Section C. Again, we strongly believe that these changes will enhance customer agencies ability to develop sound OASIS statements of work and compete task orders. Finally, it does not appear that the BLS cost index matches up with the occupations/professions included in the scope of OASIS. Recommend utilizing an up to date index that better reflects the professional services to be</p>
RESPONSE: After examining literally thousands of labor categories on Professional Services contracts, we can wholeheartedly state without reservation that there is simply NO standard commercial or federal practice. This is one of the fundamental complaints from our client OCOs. The groupings are only done for industry's benefit to significantly lower the number of single labor categories that would otherwise be priced. The real labor categories are the SOCs, and we feel that these are relatively straightforward and easy to understand. Might we need to tweak, tune, or add? Sure. No system is perfect. With regards to the "cost index" not matching up, please provide us with specific examples of this. As the BLS SOC encompasses all Industries, including Government, we doubt that direct labor pricing associated with OASIS would not be sufficiently considered.		

317	Section B.2.1 Labor Categories and Standard Occupational Classifications, p. 11	The introduction of Service Occupational Classifications into the OASIS contract represents an unprecedented complexity into a contract that was originally touted as easy to use. It is complex for the government and complex for the contractor. The information may be suitable for studies, analysis and trends based on historical data, but it is not suited for determining pricing on current tasks under current market conditions. Ordering Contracting Officers are accustomed to reviewing labor category descriptions and rates on contracts where the rates have been determined to be fair and reasonable without having to understand the background of the underlying methodology or survey data. Defining labor categories as Junior, Journeyman and Senior, all requiring degrees without equivalency in terms of years of experience then requiring any deviations to be clearly identified in proposals, adds to the complexity and unnecessarily reduces competition. Fundamentally, it reduces the flexibility of OASIS contractors to meet customer agency requirements. Further, grouping the labor categories corresponding to groups of SOC Numbers, Titles and Functional Descriptions adds to the complexity even if the multiple SOC numbers within each labor category group have similar salaries based on the BLS data. RESPONSE: We understand that utilization of the BLS SOC is new and there will likely be an adjustment period. However, we do not feel that it's use is any more complex than creating a completely independent labor category list. In fact, after having used it ourselves over the past few months, it is actually quite simple and provides a much stronger estimating tool for OCOs.
318	L.5.5.11.1 Corporate OASIS SB Program Manager & M.5 Scoring System (page 85 and 94)	Appears as if offerors must make a potentially sizeable initial investment in a COPM with "multiple award, multiple agency or agency-wide contract vehicles" experience. Given the OASIS SB minimum guarantee is \$100 and the SB revenue thresholds are \$14M, \$19M, \$35.5M, the requirement appears excessive for Pools 1 - 3. RESPONSE: If assigning a qualified COPM is "sizeable" to an Offeror, they should likely refrain from proposing on either OASIS contract.
319	L.5.5.11.1 Corporate OASIS SB Program Manager & M.5 Scoring System (page 85 and 94)	Please define "multi-agency". Please consider the addition of the term "multi-services" (Army, Navy, Air Force, etc.) RESPONSE: Thank you for the recommendation. We will take it under consideration.
320	Attachment J.4 & age 95)	The COPM and COCM are required to have experience managing multiple-award, multiple-agency or agency-wide MA-IDIQ contracts. Several "installation-wide" MA-IDIQ contracts such as AMCOM EXPRESS support multiple and various customers and should be considered "multiple-agency". Please confirm, AMCOM EXPRESS would be considered a "multiple-agency" vehicle as defined for OASIS SB. Please note, Page 95 of the Evaluation Criteria only provide additional points for multiple-agency or agency-wide. RESPONSE: We will edit the language to include contracts like AMCOM Express.
321	M.5 (page 94 & 95)	OASIS Evaluation Criteria for Relevant Experience and Past Performance does not appear to evaluate offerors who support a diverse and varied customer base. It would be advantageous for GSA to consider evaluation of the diversity of the offerors customer base in making awards. RESPONSE: Thank you for the recommendation. We will take it under consideration.
322	L.5.3.1 Relevant Experience Minimum Requirements & M.5 Scoring System (pages 80 and 94)	Solicitation require five (5) projects each with a award value of at least \$2M per year. \$2M per year appears excessive for Pools 1 and 2 given a small business revenue threshold (average of last 3 completed fiscal years) of \$14M and \$19M. Please note, offerors who do have 5 prime contracts with larger annual revenue \$3M to \$5M may quickly outgrow their small business status, especially under Pools 1 - 4. RESPONSE: Please see previous responses to similar recommendations.
323	L.5.5.3 Acceptable Estimating System & M.5 Scoring System (pages 83 and 95)	DFARS 215.407-5-70 outlines the applicability of Estimating System Reviews for DoD. The threshold for review of large business is typically \$50M. Please review applicable for OASIS SB especially with regards to Pools 1 - 4. RESPONSE: Please see previous responses to similar recommendations.
324	L.5.5.9 Earned Value Management Systems & M.5 Scoring System (page 85 and 95)	DFAR 234.201 outlines DoD requirements for applicable of EVMS systems. Given the contract value thresholds of \$20M and \$50M, a EVMS does not appear applicable for OASIS SB Pools 1 - 4. RESPONSE: Please see previous responses to similar recommendations.
325	L.5.3.1 Relevant Experience Minimum Requirements (page 80)	Solicitation requires five (5) projects each as a Prime Contractor or existing CTA as define by OASIS. Many small businesses may be performing substantial (\$3-5M annually) relevant portions of work as a GSA Team Member or Subcontractor under large DoD vehicles such as AMCOM EXPRESS, Navy SeaPort, etc. Recommend consideration that ALL 5 projects must not be as prime, but modified to allow for current GSA Team Member or Subcontractor work especially with regards to Pools 1 - 4. RESPONSE: Please see previous responses to similar recommendations.
326	Question 318 in Clarifications Document dated 4/26/13.	Question 318 reads, <i>Will the Government allow the use of English-language Canadian federal and provincial government past performance references? Would those references be assigned the same point values as U.S. Federal Government past performance references given that the evaluations were provided by Canadian federal or provincial government personnel?</i> We strongly recommend projects for the Canadian federal or provincial governments be treated the same as projects for any other foreign Federal government with respect to allowability and scoring. "Federal projects" in the context of an OASIS proposal should be restricted to U.S. Federal Government projects. RESPONSE: Thank you for the feedback and thank you for keeping up with our questions and answers.
327	M.4.4 & M.4.4.1, page 98	Paragraph M.4.4. VOLUME 4 – PAST PERFORMANCE, M.4.4.1. Past Performance states: "Each past performance reference that is finalized in CPARS will already have an Adjectival Rating, from the table below, associated to each of the following 6 Criteria: 1. Quality of Service; 2. Schedule; 3. Cost Control; 4. Business Relations; 5. Management of Key Personnel; 6. Utilization of Small Business Paragraph M.4.4. VOLUME 4 – PAST PERFORMANCE, M.4.4.1. Past Performance states: "If any of the 6 criteria were not assigned an adjectival rating, that Criteria will not be averaged into the final score."

		<p>The CPAR rating criteria define a Service sector contract. Many programs under Systems contracts perform professional services in categories listed under the OASIS Core Disciplines (Paragraph C.2.1 Core Disciplines). Sub-functions under each core discipline are performed on Systems contracts in ways that are indistinguishable from those performed on a Service contract. For instance, under Program Management Services, Item 10, Program Management and Item 12, Project Management are performed on both Services and Systems contracts. However, CPAR assessment Criteria on Systems contracts differ from the six (6) listed above. On Systems contracts the criteria are:</p> <p>1. Technical Quality of Product; 2. Schedule; 3. Cost Control ; 4. Management Responsiveness; 5. Program and Other Management; 6. Utilization of Small Business</p> <p>Question: Is it the Government's intention to exclude Past Performance in service areas performed on Systems (as opposed to Service) contracts because those categories are different than those stated for Services Contracts? Recommend that government expand the six categories to include Systems contracts since items in the Core Disciplines are also performed on Systems contracts.</p>
		RESPONSE: We shall.
328	L.5.4.2, page 86	<p>This implies that use of Attachment (6) is only for programs whose ratings have not been finalized in the PPIRS. It should be noted that classified or "proprietary" programs often do not report their CPAR ratings into the CPAR or PPIR systems. Will the government consider submission of unclassified performance data documented on Section J.6., Attachment (6), "PAST PERFORMANCE RATING FORM," for classified programs, which is a different situation than programs that do not enter data into the CPAR or PPIRS systems?</p>
		RESPONSE: Please see previous responses to similar questions.
329	L.5.11.1 & L.5.11.2, page 91-92	<p>GSA will simplify their review of résumés if they provide a résumé format/template. Recommend GSA include a standard resume template for all bidders.</p>
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
330	Section L, First Paragraph	<p>In addition to the revisions indicated in the April 19th Q&A release, allow subsidiaries/affiliates to get credit for certifications held by the parent company if the benefits of those certifications will be available to ordering agencies at the task order level.</p>
		RESPONSE: Please see previous responses to similar recommendations.
331	L.5.5.5.	<p>If the Defense Contract Audit Agency (DCAA) has audited a company's financial processes previously and no unfavorable findings were identified, would GSA consider modifying the OASIS SB evaluation criteria to reflect the use of a proven financial system and processes vice a "certified" system?</p>
		RESPONSE: We would need to see the specifics of what you are referring to in order to consider that recommendation. Please send us more information.
332		<p>1. In Section M.5 scoring system GSA notes that only 2 out of 5 projects may receive additional points if performed OCONUS, no other past performance element contains such a limitation. We recommend the GSA remove this limitation. Performing multiple projects abroad does add a substantial level of complexity that should be accounted for in weighting past performance examples.</p>
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
333		<p>4. GSA has made it very clear that the OASIS contract is not an IT contract. However, amongst the company certifications GSA plans to award additional points to per M.5 Scoring System GSA is offering a potential of 100-200 additional points for organizations with CMMI levels 3-5. The CMMI certifications are largely used in the software development community, which is not a core competency of this vehicle. Thus, providing IT companies with an advantage. We request that GSA not award additional points for this certification as it is not directly applicable to the professional services scope described within the OASIS PWS.</p>
		RESPONSE: Please see previous responses to this recommendation.
334	G.3.3.1 ISR Reporting, page 34	<p>Reference ISR Reporting. Will GSA consider revising the Subcontracting Goals to the GSA's current mandatory goals (which is 30%) + 7 - 10% for a total goal of 37 - 40%? Since OASIS has already created a OASIS SB and following the government's rationale for creating compelling and stringent requirements for small business participation, there is a high probability that mid-tier and large business sub-contractors will be required to meet the complex nature of the professional services work. This compromise would satisfy a significant increase to the current small business subcontracting goals and preserve the large business prime's ability to select the best athlete for each task order based on performance data and experience rather than trying to achieve the aggressive target of 50% of the subcontracted dollars.</p>
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
335	L.6. Volume 6 – Cost/Price, page 92	<p>Reference ceiling rate requirement that excludes Secret/Top Secret/SCI. For companies with FPRR that don't segregate cleared/uncleared rates, will GSA accept one bundled set of rates?</p>
		RESPONSE: We will consider the recommendations, but offer no guarantee of acceptance of fair and reasonable. Please heed the cautions regarding fair and reasonable pricing.
336	L.5.4.1, page 86	<p>Reference "No proposal submission is necessary." To ease evaluation and traceability, recommend that the government consider adding a summary page (outside of page count) detailing which supporting documents are available for each contract and where they can be located within the volumes or attachments.</p>
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
337	L.5.4.1., page 86	<p>Reference CPARS from the PPIRS database. To ease evaluation, recommend that the government allow offerors to submit electronic image copies of the most recent CPARs from PPIRs for cited projects (outside of page count)</p>
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
338	L.4. Proposal Format, page 77	<p>Reference "Pages shall be 8.5 x 11 inches; single-spaced; font type and size shall (12) point Arial; Margins shall be 1 inch." Will the government consider a reduced font size for text in tables, charts and graphics?</p>
		RESPONSE: Thank you for the recommendation. We will take it under consideration.

339	L.5.5.8 p. 90, 101	Reference CMMI requirements. While CMMI is a relatively well-established process standard for software development, it is an emerging and untested measure of successful process administration for executing complex professional services or administration of IDIQ contracts. Recommend that the government consider removing CMMI requirements, as well as the evaluation weighting (associated points) at the IDIQ level and incorporate them, as appropriate, at the TO level. If the government would like confidence that the offeror has successfully attained these certifications (CMMI Level 3 or above) at a program or other relevant level, then recommend requesting evidence of current certifications as an attachment.
		RESPONSE: Please see previous responses to the same or similar recommendations.
340	L.5.5.11, p 91, 101	Reference the Corporate OASIS Contract Manager. The 1994 Federal Acquisition Streamlining Act resulted in significant growth in IDIQ contracting, primarily in the past 10 years. Rather than differentiating between the best IDIQ resources available in industry, the point value for a Masters Degree will have the unintended consequence of forcing industry to propose individuals that have likely moved on to different roles in the company rather than the best candidate (most experienced in the successful day-to-day administration of an IDIQ). Recommend that the government allow years of experience to substitute for education. Further recommend that the government consider the commonly-used formula of 2 years of experience = 1 year of education.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
341	Q/A #20, April 4th, 2013	Reference response #20: "As there is no work performed at the IDIQ level, relevant experience should reference a specific task order or contract where work was actually performed." Recommend making allowances for IDIQ programs that only report CPARs and SB goal progress at the IDIQ level.
		RESPONSE: Please see previous responses to the same or similar recommendations.
342	H.6, pages 44 and 45	For those firms that qualify as a small business under Pool 1 and have 3-year average revenue of less than \$14M, it would be surprising if the Government will find many, if any, firms with a Purchasing System, ISO 9001 certification, AS9100 certification, any level of CMMI certification, and EVM system. We recommend that the Government consider excluding those from the systems, compliances, and certifications required for Pool 1 offerors. Otherwise, the Government can expect that Pool 1 offeror evaluation scores will be lower than larger small businesses from Pools 3 through Pool 6.
		RESPONSE: While it is irrelevant what the scores are in any other Pool, we feel you may be surprised at what some companies have achieved with regards to systems and certifications, even below the \$14M revenue level. If what you say is accurate and no companies in Pool 1 have these items, then leaving the items as scoring factors influences nobody. However, if companies do indeed possess these items, they shall be rewarded for it with points as part of the overall scoring.
343	L.5.3.1, page 80	Please provide Relevant Experience Minimum Requirements that are more realistic with companies relative to the indicated business size standards for each competitive Pool. The current minimum requirements, although they are easily achievable and realistic for firms competing in Pool's 3, 4, 5, and 6; they are extremely unrealistic for companies proposing to bid in Pool's 1 and 2. If the Government decides to use the current Relevant Experience Minimum Requirements and Relevant Experience Scoring System as described in Section M.5, the Government is at risk at not having 40 eligible prime contractors for Pool's 1 and 2 and at risk at having an extremely large number of firms in Pools 4, 5, and 6 who will all achieve the maximum potential points based on the same criteria in Section M.5 and therefore requiring the Government to award significantly more than 40 prime contracts in these Pools... We recommend different standards for each Pool...
		RESPONSE: The requirements have already been relaxed. Furthermore, we have little doubt that we will have robust competition in all Pools and we will be surprised if any company, on either contract, scores a perfect score in the OASIS scoring system.
344	L.5.3, Relevant Experience and L.5.4, Past Performance	As written, the RFP requirements require that any past performance be distributed on a single task order. This approach may be overly restrictive. Considering that OASIS will be an IDIQ contract, demonstrating the ability to effectively manage a high volume IDIQ vehicle and resulting task orders while maintaining high customer satisfaction at the contract and task order levels is highly relevant for an OASIS evaluation. This approach would allow for more mid-tier companies to be competitive against larger companies. Would GSA consider allowing the use of a Single Award IDIQ contract as evidence of necessary past performance as long as at least one Task Order has the depth and breadth to cover at least 4 of the 6 core disciplines?
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
345	L.5.5.11.1 Corporate OASIS Program Manager	As written, the RFP requires the COPM and the COCM show relevant experience managing Multiple Award IDIQ. Performance requirements are typically not substantially different for Single vs Multiple Award arrangements. Will GSA clarify why Multiple Award experience is necessarily distinguished in the requirements? Will GSA consider including experience managing Single Award IDIQ contracts for the COPM's and COCM's relevant years of experience?
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
346	Volumes 3 and 4	Reference Volumes 3 and 4. Request that the Government allow bidders to include a supplement for Volumes 3 and 4 that summarizes all the Past Performance/Experience to augment the data in the requested award documents and tractability matrix (attachment J.5). This summary would enable the offeror to articulate the relevance of the particular performance/experience reference in an abbreviated narrative form and provide an overall summary matrix (limited to five pages per volume).
		RESPONSE: We are considering something of this nature.

347	L.5.4 Past Performance, page 86	Reference objective contractor evaluations. Will the government please consider allowing contractor evaluations to be reported from sub-systems that have not yet been fully integrated into the CPARS or PPIRS system that contain equivalent objective government evaluations for contractor performance such as the ACASS system for DISA?
		RESPONSE: We would need to see the specifics of what you are referring to in order to consider that recommendation. Please send us more information.
348	M.5 Scoring System, Volume 5 - Systems, Certifications, and Resources (Page 101)	COPM and COCM Master's degree scoring criteria. There are many highly qualified program and contract management professional with extensive experience successfully managing MA-IDIQ contracts that do not possess post-graduation degrees. What is the rationale for awarding additional points for key personnel with graduate degrees? Will GSA consider additional years of experience on top of required years of experience in lieu of/equivalent to a master's degree? For example, if the proposed COPM has a 20 years of experience managing MA-IDIQ contracts, they would meet both the 15 years of experience and master's degree scoring requirements for a total of 100 points for the two requirements.
		RESPONSE: We feel, like many others, that there is value in advanced education. We are considering recommendations for "substitutions".
349	M.5 Scoring System, Volume 5 - Systems, Certifications, and Resources (Page 101)	Will GSA consider additional years of experience in lieu of/equivalent to a master's degree for scoring? For example, if the proposed COPM has over 17 years of experience managing MA-IDIQ contracts, they would meet both the 15 years of experience and master's degree scoring requirements for a total of 100 points for the two requirements.
		RESPONSE: Please see the previous responses to this recommendation.
350	L.5.5.11.2 Corporate OASIS Contract Manager (COCM) (Page 91)	Provision L.5.5.11.2 encourages one of a number of industry available certifications from NCMA. Will GSA consider adding DAWIA Level-3 Certification as one of the options given the number of Contracting Professionals that have successfully accomplished Level-3 Certification through the Defense Acquisition University (DAU)?
		RESPONSE: Yes.
351	L.5.5.9 Earned Value Management Systems; Section M.5 Scoring System (Page 90)	Because the contractual requirement for a certified EVMS system is not mandatory for contracts under \$50M, many companies that have numerous cost reimbursement contracts of still fairly significant size have not met this requirement. In addition, the current back log for DCMA EVMS audits is approximately three years. Recommend allowing documentation proving a contractor's system is EMVS ANSI/ EIA Standar-748 compliant or an independent third-party assessment in lieu of a DCMA audit report to meet the scoring requirement in Section M.5.
		RESPONSE: Please provide us with information regarding what kind of company might perform such a 3rd party evaluation and we will consider it.
352	General Question	A number of questions have focused on the evaluation of "Mid-Tier" companies. While there is no such designation within acquisition regulations, the benefit to GSA to ensure that mid-tier companies are available is significant. Mid-tier companies generally have greater flexibility and flatter organizational structures allowing them to be more nimble in the delivery of services than their large-tier counterparts. Likewise, mid-tier companies have accomplished a financial size and stability that makes them reliable sources for mid-sized opportunities. Finally, mid-tier companies tend to have less indirect costs and therefore lower cost to the end user because they have less infrastructure that is required to achieve all of the system approvals and certifications identified in provisions L.5.5.3 through L.5.5.9. Recommend that GSA set-aside half of the large business awards for companies that fit the mid-tier echelon. Definition of mid-tier might be "companies that have 4 or less of the certifications/approvals required by L.5.5.3 through L.5.5.9."
		RESPONSE: We simply cannot do that within the law. While we will not argue the potential value of what many call "mid-sized" companies, this is an issue for decision makers with authority to change law and regulation. We can do nothing at the contract level until something is done at that level.
353	M.5 SCORING SYSTEM (Page 100)	The stated GSA OASIS objectives are to address agencies requirements for integrated services, e.g. the range of lifecycle services needed by a particular agency to meet an operational need. The graphic from section C.2 SCOPE shows these lifecycle services. It would seem that the evaluation criteria and scoring matrix should focus more on the offeror's ability to deliver these integrated lifecycle services, rather than multiple core disciplines, in order to meet the procurement objectives. The focus on core disciplines addresses breadth of business focus, not the ability to deliver integrated services to a GSA customer.
		RESPONSE: We welcome any specific changes you might suggest.
354	L.5.5.11.1 (Page 85) and L.5.5.11.2 (Page 86)	Would GSA consider adding Defense Acquisition University (DAU) Program Management Level III and DAU Contracting Level III to the list of acceptable certifications for the COPM and COCM, respectfully? The curriculum for both is comparable in the areas of study to both the PMP and NCMA Certifications. DAU is also an International Association for Continuing Education & Training (IACET) Authorized Provider. DAU requires hours of course work to complete the certification in addition to the required experience and education requirements.
		RESPONSE: Yes, we will add those.
355	Section M overall, Page 89 Section M.5 Scoring System, Page 94	Comment: We believe that some of the evaluation methods GSA has presented for the small business RFP requirements are more appropriately applied to large business. (Such as the bonus points awarded for reviewed/approved Estimating Systems, Purchasing Systems, and EVM Systems) This creates an imbalance in scoring within certain capabilities when compared to the overall scope of services. (CMMI when this is a non-IT focused GWAC; and using AS9100 Quality Standard which is Aerospace focused vs. the more appropriate ISO 9000/9001). The inclusion of bonus points for Estimating Systems, Purchasing Systems, and EVM Systems requirements add a significant advantage to a very small group of small business contractors in Pools 1-3 since the requirements for such reviewed/approved systems are generally only required from larger businesses. This significantly reduces competition which is contrary to the Competition in Contracting Act (CICA) and President Obama's, March 4, 2009 Memorandum on Government Contracting where the President has reinforced CICA in his statement that, "When awarding Government contracts, the Federal Government must strive for an open and competitive process." While GSA has established an evaluation scoring structure in Section M.5 Certifications that awards "points" based upon relevant experience, past performance and the status and existence of systems, the requirements for certifications disadvantage most small businesses in Pools 1-3 and

		<p>Question: Would the Government consider implementing these suggestions for a revised Section M.5 Scoring System?</p> <ol style="list-style-type: none"> 1. Would the government consider removing scoring requirement for section L.5.5.3. Acceptable Estimating System? 2. Would the government consider removing scoring requirement for section L.5.5.5. Approved Purchasing System? 3. Would the government consider removing scoring requirement for section L.5.5.7. AS9100 Certification? 4. Would the government consider removing scoring requirement for section L.5.5.8. CMMI Maturity Level 3? 5. Would the government consider removing scoring requirement for section L.5.5.8. CMMI Maturity Level 4? 6. Would the government consider removing scoring requirement for section L.5.5.8. CMMI Maturity Level 5? 7. Would the government consider removing scoring requirement for section L.5.5.9. EVMS ANSI/EIA Standard-748?
		<p>RESPONSE: Absolutely not to all. Both us and our clients feel that these systems and certifications are desirable. The majority of Industry feedback has supported this as well.</p>
356	H4.2.1, Page 41	<p>Comment: Under Pool 3, \$35.5M; NAICS 561210 Facilities Support Services includes relevant scope areas consistent with OASIS Core Disciplines to include, at a minimum, Program Management Services (C.2.1.1), Engineering Services (C.2.1.4), and Logistics Services (C.2.1.5). Specifically, within NAICS 561210 maintenance services, services related to operations, and base facilities operations support services are key components of Facilities Support Services. There are currently 13,198 companies registered under NAICS 561210 Facilities Support Services as found on System for Award Management (SAM) which would greatly improve competition for this procurement. Additionally, during the Professional Services Council meeting with GSA OASIS PM, on 18 April 2013, the PM made reference to Base Operating Support Services.</p> <p>Question: Would the government consider adding NAICS 561210 as part of Pool 3?</p>
		<p>RESPONSE: No. Please see the previous responses to this recommendation.</p>
357	L.5.3.1, Page 80	<p>Comment: As a non-IT set of scope requirements, a \$2M per year size for past performance is not common and presents a very restrictive threshold. Additionally, a \$2M per year size threshold for Pools 1 - 3 is counter to the intent of CICA.</p> <p>Question: Would the government consider lowering the past performance size threshold from \$2M/year to \$1M/year or lower?</p>
		<p>RESPONSE: Please see the previous responses to this question.</p>
358	L.5.3.1, Page 80	<p>Comment: The past performance requirements including five (5) prime contracts, integration of three or more core disciplines, and value of \$2M or more per year are very restrictive for small business especially those within Pools 1, 2, and 3 and are counter to the intent of CICA. Additionally, the requirements for preventing "off-ramped" is three awarded task orders. Finally, there are up to 700 points available for OCONUS Work (200 points) and Multiple Locations (500 points). For small businesses within Pools, 1, 2, and 3, OCONUS work and multiple location work is typically performed as a subcontractor especially OCONUS work until such time the small business builds the infrastructure (e.g., human resources, deployment, accounting, and quality control) to enable deploying and managing OCONUS and multiple location work.</p> <p>Question: Would the government consider changing the requirements requiring all five past performance references as a prime contractor to three (3) past performance references performed as a prime contractor and two (2) past performance performed as a subcontractor as long as the references integrate three or more core disciplines which will enable small businesses to maximize its points in OCONUS and multiple locations?</p>
		<p>RESPONSE: No. Please see the previous responses to this recommendation.</p>
359	L.5.5.3, Page 83	<p>Comment: Under Title 48 Federal Acquisition Regulations, the term "Acceptable Estimating System" is defined in Title 48, Chapter 2, Defense Acquisition Regulations System at 252.215-7002 "Cost Estimating System Requirements". The applicability "that all contractors have acceptable estimating systems.." state: A Large Business is subject to the estimating system disclosure, maintenance and review requirements if - i) in its preceding fiscal year, the contractor received DoD prime contracts or subcontracts totaling \$50 million or more for which cost or pricing data were required; or ii) In its preceding fiscal year, the contractor received DoD prime contracts or subcontracts totaling \$10 million or more (but less than \$50 million) for which cost or pricing data were required and the contracting officer, with concurrence or at the request of the ACO, determines it to be in the best interest of the Government (e.g., significant estimating problems are believed to exist or the contractor's sales are predominantly Government). In addition to this requirement being application solely to Large Businesses, DFAR 215.407-5-70 further provides under paragraph (c) (iii) Not apply the disclosure, maintenance, and review requirements to other than large business contractors. Based on this, we believe that the points awarded for providing certification or evidence of and Acceptable Estimating System is inappropriate for Pools 1-3 scoring since such requirements are by regulation not applicable to small business concerns.</p> <p>Question: Would the government consider eliminating cost estimating system requirement from scoring for the</p>
		<p>RESPONSE: If no small businesses have an estimating system, then it won't affect any Offerors.</p>

360	L.5.5.5, Page 83	<p>Comment: FAR 44.302 defines the requirements for Contractors' Purchasing Systems Reviews. The guidance provided states (a) ... "If a contractor's sales to the Government (excluding competitively awarded firm-fixed-price and competitively awarded fixed-price with economic price adjustment contracts and sales of commercial items pursuant to Part 12 [e.g., cost reimbursable contracts) are expected to exceed \$25 million during the next 12 months, perform a review to determine if a CPSR is needed. Sales include those represented by prime contracts, subcontracts under Government prime contracts, and modifications. Generally, a CPSR is not performed for a specific contract. The head of the agency responsible for contract administration may raise or lower the \$25 million review level if it is considered to be in the Government's best interest. There are very few Small Business contractors that would meet this requirement, and the assignment of 500 points for providing an Approved Purchasing System limits competition or at the very least rewards but a few Pool 1-3 contractors to the disadvantage of the majority of qualified Small Business Offerors.</p> <p>Question 1: Would the government consider eliminating contractors' purchasing system requirement from scoring for the evaluation of Small Business Proposals in pools 1-3?</p> <p>Question 2: Would the government consider adding scoring structure for both Certified Systems and</p>
		<p>RESPONSE: Question 1: No. Question 2: What are you considering an "acceptable" system?</p>
361	L.5.5.7, Page 84	<p>Comment: AS9100 is a quality management system for the aerospace industry and fully incorporates the entirety of the current version of ISO 9000/9001. Additionally, aerospace is not an identified area of expertise in the OASIS Scope. We believe it is inappropriate for Pools 1-3 scoring of Small Businesses.</p> <p>Question: Would the government consider eliminating AS9100 as a scored component?</p>
		<p>RESPONSE: Please see the previous responses to this recommendation.</p>
362	L.5.5.8, Page 84	<p>Comment: CMMI is a maturity model focused on driving repeatability, standardization, and optimization of processes associated with software development/systems integration. Given OASIS is a non-IT GWAC, the relevancy of CMMI is not apparent.</p> <p>Question: Would the government consider removing CMMI and its associated maturity levels as a scored requirement?</p>
		<p>RESPONSE: Please see the previous responses to this recommendation.</p>
363	Section L overall, Page 73	<p>Comment: The government has placed a great deal of emphasis in a company's demonstrated ability to manage and deliver a GWAC as evidenced by organizational quality management system (e.g., ISO 9001:2008) scoring requirements and by the detailed personnel requirements of both the Program Manager and the Contracts Manager.</p> <p>Question: Would the government consider adding a requirement asking offerors to demonstrate their approach, track record, and success in Managing and Staffing multiple-award, task order driven IDIQs/GWACs by including a Management and Staffing Approach?</p>
		<p>RESPONSE: No. We will not include subjective evaluation material unless we have no other choice.</p>
364	Section L.5.5.9, page 85	<p>Comment: As provided in FAR 34.2, the government is required to incorporate into Federal contracts EVMS for "major acquisition for development projects" as required in OMB Circular A-11. We acknowledge that the government may also require EVMS for other acquisitions. When the government is making such a requirement part of the resultant contract, it should insert the appropriate clause(s) contained in FAR 52.234 to the proposed contract to inform the potential contractors of the requirement to provide EVMS services. In a review of the OASIS General and Special Conditions, there is no incorporation of the requirement for the implementation of EVMS on contract work. However, the proposal evaluation instructions have established up to 100 points for the verification of a EVMS that meets ANSI/EIA Standard-748.</p> <p>Question: Would the government consider eliminating the points for EVMS or the requirement for EVMS be added to the contract requirements?</p>
		<p>RESPONSE: No.</p>
365	L.5.3.1, page 80	<p>For many small businesses, a majority of their revenue and experience comes from being a subcontractor. For many companies under the \$14 million size standard, this can be as much as \$7 million worth of revenue that may not qualify because it was not obtained as a prime. Therefore, we respectfully request that the projects be expanded to include project experience performed as both a prime or as a subcontractor.</p>
		<p>RESPONSE: Thank you for the recommendation, but are unlikely to change this.</p>
366	L.5.5.8. CMMI Maturity Level, page 90	<p>We find the requirements and points allocated to be clear for the various levels of Capability Maturity Model Integration (CMMI) as outlined in the draft RFP. The model's aim is to improve existing software-development processes, although it can also be applied to other processes. However, it is unclear as to why GSA is awarding points for this requirement, since this model is used primarily in Industry for IT processes and OASIS is not an IT contract. We recommend that the requirement for CMMI certification and the awarding of points, at any level, be removed in its entirety from the solicitation document. Awarding of points to firms for a certification that does not align with the services that will be procured under the GSA OASIS vehicle seems to inadvertently reward firms with this certification and penalize professional service firms who are not CMMI certified because software development is not a core discipline for their business.</p>
		<p>RESPONSE: Please see previous responses related to this recommendation.</p>

367	L.5.5.11.2. Corporate OASIS Contract Manager (COCM), page 91	We believe that the requirements for the COCM is overly restrictive, based on industry practice in the contracts management field. We recommend removing the 50 points allocated for COCMs who have a master's degree in a business-related field. A more acceptable industry practice for a Contracts Manager is to receive a professional acquisition certification from the National Contracts Management Association (NCMA). There is no requirement to have a master's degree to obtain this stringent and rigorous level of certification; therefore, many Contracts Managers do not seek master's degrees in their area of practice since their NCMA certifications has already established their level of excellence and knowledge of acquisition standards. The requirement for a master's degree in a business-related field is limiting and restrictive for Offerors in both the unrestricted and small business pools.
		RESPONSE: First, points are not restrictive, they are a bonus for desirable attributes. We believe that advanced education is desirable in any professional discipline. Accordingly, the points for a master's degree will apply.
368	L.5.5.11. Key Personnel Resumes; L.5.5.11.1. Corporate OASIS Program Manager (COPM), sub paragraphs 2 and 3, pg 91	The requirement states, "The COPM shall have a minimum of 5 years experience, from the date the solicitation closes, in Project Management or Program Management and the following minimum qualifications:..." These requirements in sub paragraphs two and three read like those needed at the task order level, not those required for contract management, marketing and reporting at the Master Agreement level. It is recommended that the Government amend the current language to read as follows: "The Contractor's corporate management structure shall guarantee senior, high-level, program management of the OASIS GWAC Program. The Contractor Program Manager duties include, but are not limited to: (a) Advising and assisting OASIS customers regarding the technical scope of the Basic Contract and the overall attributes of the OASIS GWAC Program; (b) Providing all reporting information required under the Basic Contract accurately, thoroughly and timely; (c) Resolving issues related to Order performance under the Basic Contract; and (d) Attending meetings and conferences as necessary."
		RESPONSE: Thanks for the recommendation. We will take it under consideration.
369	L.5.3.2.3 Contractual and Proposal Documents for Relevant Experience Projects, sub paragraph 3, pg 86	The requirement states, "The Labor Categories listed in the contract document, or if none listed in the actual award document itself, the Contractor's proposal that specifies the Offeror's labor category response to the contract solicitation." It is recommended that the government modify this requirement to request only those specific proposal pages citing the labor categories, as proposals in their entirety can be enormous.
		RESPONSE: We will.
370	L.4. PROPOSAL FORMAT, Table Legend: Note 1, pg. 77	The submission requirements state, "Note 1: Pages shall be 8.5 x 11 inches; single-spaced; font type and size shall (12) point Arial; Margins shall be 1 inch." However, the Section J templates have significantly different fonts and sizes from those called out in Section L.4. It is recommended that newly created proposal materials, such as Subcontracting Plans, Resumes, Cost Price Rationale be in the specified 12 pt font format and maintain the pre-formatted font selection and point sizes already established within the supplied Section J templates.
		RESPONSE: Thanks for the recommendation. We will take it under consideration.
371	L.4. PROPOSAL FORMAT, Table Legend: Note 1, pg. 77	The submission requirements state, "Note 1: Pages shall be 8.5 x 11 inches; single-spaced; font type and size shall (12) point Arial; Margins shall be 1 inch." The Draft RFP calls for the submission of a variety of corporate documents, which cannot be altered for the purpose of submission, but which do not conform to the mandated Arial 12pt font standard. Actual government documents (e.g. Contract awards) and Corporate documents (e.g. articles of incorporation) cannot be altered to meet the font size standard. It is recommended that these types of documents be exempt from the noted page and margin sizes, font size, and standards requirements.
		RESPONSE: Thanks for the recommendation. We will take it under consideration.
372	Section J.5., Attachment (5) Subsection B. Relevant Experience Matrix	As drafted, the Relevant Experience Matrix data fields (e.g. Document Reference Label field) does not provide the space necessary to insert the number of possible references for a specific contract reference. It is possible to have numerous citations that address the Core Disciplines performed. It is recommended that the Government allow contractors to modify Section B. Relevant Experience Matrix, to accommodate multiple document references. This will support the evaluator's task of validating and verifying specific Core Discipline citations proposed by the contractor.
		RESPONSE: We will implement this recommendation.
373	G.3.3.2 SSR Reporting, Sub-paragraph 3, pg. 35	The requirement indicates that "OCONUS subcontracting is not counted on SSRs." It is recommended that the Government confirm that OCONUS subcontracting is not included in the total subcontracted dollars (the denominator) or the applicable small business subcontracting dollars (the numerator)?
		RESPONSE: Answer pending.
374	H.6.4. Forward Pricing Rate Agreements and Approved Billing Rates,pg 44; and, Section J.4. Attachment (4), Section L.5.5. (Volume 5 - Systems, Certifications, and Resources), pg. 2; and L.5.5.4. Forward Pricing Rate Agreements and/or Approved Billing Rates, pg. 89	RFP paragraphs H.6.4 and L.5.5.4, as well as the J.4 checklist, request offerors to provide Forward Pricing Rate Agreements and/or Approved Billing Rates. In many cases, DCMA issues Forward Pricing Rate Recommendations in lieu of Forward Pricing Rate Agreements. In addition, there is a time lag between the time that an offeror submits forward pricing rates to the Government and the time that the Government issues a recommendation or agreement. It is recommended that the language be modified to recognize either Forward Pricing Rate Agreements, or Forward Pricing Rate Recommendations as acceptable in addition to having the Government accept forward pricing rates that are in a "submit" status pending DCMA's recommendation for purposes of GSA conducting its evaluation. This recommendation is strongly requested due to the fact that company's rate structures do change from time-to-time and are dependent on DCAA audit cycles which are not be in synch with this acquisition. Allowing a "submit" status will provide GSA an optimal pool of competitive companies for this acquisition.
		RESPONSE: Thanks for the recommendation. We will take it under consideration.
375	Section J7, Attachment (7), III Goals, pg 2	Section J7 requires offerors to express subcontracting goals as both a percentage of the total subcontracted dollars and as a specific dollar amount. The IDIQ nature of the planned contract eliminates the ability to accurately predict revenue or subcontracted dollars. To retain focus on goal achievement without influence of unknown future revenue, it is recommended that the Government revise the template to require subcontracting goals as a percentage, excluding specific dollar amounts.

		RESPONSE: We are working this issue right now.
376	B.2.1. Labor Categories and Standard Occupational Classifications, pg. 12	The draft RFP 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 recommended that the Government exclude Firm Fixed Price contract types from this requirement.
		RESPONSE: Please see previous response to this recommendation.
377	G.3.1. Contract Access Fee (CAF), pg. 31	The draft RFP states, "On all task order solicitations, regardless of contract type, the Contractor shall include CAF in their cost or 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)." It is strongly recommended that the Government make it mandatory that the CAF is a separate CLIN for all task order solicitations for greater transparency, accurate reporting and remittance, and to facilitate standardized treatment and record's transparency in support of audits.
		RESPONSE: We are working this issue right now.
378	G.3.2.1. Task Order Award Data, pg. 31	The draft RFP states, "Regardless of contract type, all task order award data shall include: 1. OASIS Contract Number 2. Task Order Award Number (NOT the Solicitation Number) 3. Task Order Description (i.e., Type of Professional Services Project) 4. Government-Site or Contractor-Site 5. Predominant Contract Type (e.g., T&M, CPFF, FFP, etc.) 6. Task Order NAICS Code 7. OASIS Pool Number 8. Task Order PSC Code 9. Customer OCO Name, Phone Number, and E-mail Address 10. Customer Agency Name and Full Address 11. Customer Agency Code and Bureau Code 12. Initial Period of Performance 13. Award Date 14. Contract Line Item Numbers (CLINs) of the task order. (If the task order does not establish CLINs, the Contractor shall input CLIN Number 9999 as a single CLIN for all billing) 15. Contract Type for each CLIN 16. An electronic copy of the complete task order awarded by an OCO 17. An electronic copy of the complete task order solicitation issued by the OCO The above requirements are excessive data requirements on the part of the contractor to have to provide to the Government. It is recommended that the Government reduce the amount of data related information to only
		RESPONSE: The reporting requirements shall remain. Most of the feedback we've received from Industry suggests that this level of reporting is not excessive.
379	H.9.3, pg.51	The OASIS focus is on services. We believe it is imperative for the contractors to focus on providing services to Government customers without encumbering Organizational Conflict of Interests (OCIs). The OCI section as currently written is weak. We believe that the present evaluation criteria will lead to many awards to large companies, most of which work heavily on development contracts. Many of these companies will have OCIs with professional services supporting the Government. We recommend that the OCI clause strengthened to indicate that companies that work on development contracts for an agency are prohibited from bidding on professional services from that agency.
		RESPONSE: Please provide recommended language.
380	L.5.5.11.1, pg. 91	We request that the DAWIA PM certification be added as certification for the PM. PMs in the Government or military often receive the DAWIA certification in lieu of the PMI certifications. Not allowing this as an alternative penalizes former Government and military personnel who now work for contractors.
		RESPONSE: We will allow for this.
381	M.5, pg. 100	Requiring all five citations to employ multiple locations is excessive. Some key Federal customers are not geographically dispersed. We suggest that the multiple locations criteria be treated like OCONUS and be limited to no more than 2 items.
		RESPONSE: This is not a requirement, this is a scoring factor.
382	M.5, pg. 101	Under Volume 5, the AS901 certification should be removed. This certification is only relevant to one subset of Federal Government customers (aviation). Leaving it in penalizes the vast majority of companies who have no intention of working for this subset of customers. It should be added at the task order level
		RESPONSE: Given the breadth of the OASIS Scope, we are trying to add more certifications that might apply to given fields of OASIS, not delete them. This allows flexibility in the different companies and their associated core competencies that could end up on the OASIS contracts.
383	M.5, pg. 101	Since this is primarily a professional services contract and not a development contract, we believe that no additional points should be given for CMMI Levels 4 and 5. Doing so, places too great a emphasis on CMMI/development.
		RESPONSE: We will consider the recommendation, but are unlikely to implement it.
384	M.5, pg. 101	Under Past Experience, we recommend that a new criteria be added called "Number of Current Federal Multiple Award IDIQ vehicles" with point awards as follows: >5 =200 points, > 7=400 points, and >10=800 points. We make this recommendation because we believe that managing and successfully executing MA IDIQ contracts is critical to this effort. In fact, we believe that managing past professional service vehicles is a better indicator of integration success than integration of the six disciplines at the task order level. As indicated above, OASIS is the first multiple award IDIQ to integrate these six disciplines. The only way for the Government to obtain such integrated support in the past was to let two or more task orders under an IDIQ vehicle. This makes past experience in managing multiple award IDIQ professional service contracts critically important.
		RESPONSE: Thanks for the recommendation. We will take it under consideration.

385	Section L.5.3.1, pg. 85 and M.5, pg. 100	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 \$3M to \$5M per year value will allow for more competition from mid-size companies.
		RESPONSE: Please see previous responses to similar recommendations.
386	Section L.5.4.3, pg. 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: Thanks for the recommendation. We will take it under consideration.
387	L.5.5.11.1&2, pages 85-86	Will the government consider accepting equivalent military course work/certifications?
		RESPONSE: Please see previous responses to similar recommendations.
388	L.5.3.1, page 80	For the small businesses that want to compete in Pool 1 (\$14 million max revenues), it may be a very restrictive requirement (and consequently reduce competition) to impose the \$2 million annual award requirement for Cost Reimbursement awards, especially in view of the small number of such awards in this category over the past few years. Will the government consider a more reasonable requirement such as \$150,000?
		RESPONSE: Please see previous responses to similar recommendations.
389	C.2.1.4, page 18	Under The Engineering Core Discipline there is no reference to Software Engineering or software sustainment type modifications to systems. Will the government consider adding Software Engineering to section C.2.1.4 Engineering Services?
		RESPONSE: No. That is an IT function.
390	L.6, Volume 6 COST, Paragraph 6, page 87	It appears that the labor categories called out in the solicitation do not adequately address the activities in the logistics field. Would the government consider expanding the labor categories to include such categories as Logisticians, Logistics Analysts, Material Maintenance and Mechanic type slots, as well as Supply Technicians?
		RESPONSE: Thanks for the recommendation. We will take it under consideration.
391	L.5.3.1, page 80	Requiring companies to demonstrate 5 distinct projects as a prime contractor each having a total award value of at least \$2M per year limits the OASIS SB contract vehicle to a small group of companies. Furthermore, for a small company to have 5 \$2M contracts, which equates to <i>at least</i> \$10M in revenue a year, places them on the threshold of a large business in 2 of the NAICS codes pools – Pool 1 and Pool 2. The likelihood of the companies winning prime contracts in these 2 pools growing out of the size standard before the 5 year period of performance is over is very high. Adjusting these requirements would ensure that there are a variety of small businesses, that the competitive pool is large enough, and that those companies who win prime contracts will be more likely to maintain their position and not outgrow their pool.
		RESPONSE: Please see previous responses to similar recommendations.
392	L.5.3.1, page 80	We recommend taking into consideration unique situations where a company primes a large contract that is treated like an IDIQ, but technically is not an IDIQ. The projects under the contract are separate tasks, with separate government CORs/PMs, separate requirements, separate performance measures, and funded by each separate client. Writing the requirements in a way that would allow a company to use a large "IDIQ-like" contract for multiple project citations would be beneficial to those companies responding.
		RESPONSE: Please see previous responses to similar recommendations.
393	L.5.3.1, page 80	Summarizing the above two suggestions and echoing many other companies so far, we believe that the requirements are too difficult for many small businesses to attain. As a small businesses we often have a mixture of prime and sub work, often the majority is sub-contracted work to a large business prime. In this time of Government economic crisis and uncertainty due to the recession and now sequestration, we find large businesses competing against small businesses for contracts they would ignore in better times. We often choose to sub-contract to gain a portion of the revenue rather than get none. Requiring 5 distinct Prime contracts having a value of at least \$2M a year is a challenge for many small businesses. We have two relatively large contracts but many \$500K or lower contracts won as prime where we could compete fairly against only other small businesses. We believe five Prime contracts of at least \$2M a year (plus revenue from sub-contracting) would mean a company likely has outgrown the \$14M NAICS size standard and not qualify for Pool 1. Having five Prime contracts of that size within the scope of OASIS is a high hurdle for any candidates for Pool 1-3. Suggest requiring 1 or 2 contracts of the \$2M or more size standard vs. all 5 Prime contracts with the remainder being at a minimum \$500K/year.
		RESPONSE: Please see previous responses to similar recommendations.
394	L.5.3. Relevant Experience page 80+; also addressed in the Q&As	We have a concern about defining a "project" as a single task order or contract. Often task orders under a single-award IDIQ are interrelated and form a larger integrated program. Certain procurement strategies favor multiple, related, smaller dollar-value task orders rather than large contracts; the current definition of project unfairly disallows referencing contracts with this structure, even though they are directly relevant to OASIS SB and the way OASIS SB customers may want to structure their own task orders. We recommend that GSA redefine "project" to include multiple task orders under a single-award IDIQ. We understand the CPARS entries are not structured to evaluate multiple integrated task orders in this way, so offerors would be encouraged instead to submit Attachment 6.
		RESPONSE: Please see previous responses to similar recommendations.
395	L.5.3. Relevant Experience page 80	Please consider allowing projects that have 6 months of completed performance or more. 6 months is a reasonable amount of time for an Offeror to demonstrate the quality of performance.
		RESPONSE: We will consider this recommendation, but are unlikely to implement it.

396	Blog Post "Changes to the OASIS SB Draft Solicitation"	We recommend adding "experience with at least one cost reimbursable contract type" to the "SYSTEMS, CERTIFICATIONS, AND RESOURCES" section of scoring, so that companies that cite such a contract as one of their relevant experience examples receive credit. We agree that experience with cost reimbursable contracts should not be a pass/fail factor, but since there is a certain level of complexity associated with these contracts, OASIS customers can benefit from contractors who have that experience.
		RESPONSE: We are considering something of this nature.
397	M.5, page 95	OASIS customers will get value from a company that has ISO certification similarly to a company that has CMMI certification. Having both certifications does not necessarily increase the likelihood of success while increasing the maintenance cost for the company and ultimately the Government. We recommend merging ISO and CMMI into one scored line item, and award points for having either (as opposed to both).
		RESPONSE: Please see previous responses to similar recommendations.
398	L.5.3. Relevant Experience page 80+	We believe it will be helpful to evaluators to have information from Offerors that references where in the attached contract and proposal documents certain evaluated criteria have been met, such as what Core Disciplines were performed, whether there were multiple places of performance, etc. Please add language that allows Offerors to attach this supporting information.
		RESPONSE: We are considering something of this nature.
399	B.1., p. 10	Recommend changing "including all organizations within the Department of Defense (DoD)" to "including all organizations within the Department of Defense (DoD) and the National Security Community."
		RESPONSE: Thanks for the recommendation. We will take it under consideration.
400	C.2.1.3., p. 18	Recommend adding: Decision Support Sciences, Modeling & Simulation, Operations Research, Data Analytics, and Data Science.
		RESPONSE: Thanks for the recommendation. We will take it under consideration.
401	C.2.1.5., p. 19	Recommend adding Technology and Industrial Base Analysis.
		RESPONSE: Thanks for the recommendation. We will take it under consideration.
402	C.2.1.5., p. 19	Recommend adding Test Range Support.
		RESPONSE: Thanks for the recommendation. We will take it under consideration.
403	C.2.1.6., p. 20	Recommend adding Economic Analysis and Return on Investment Analysis.
		RESPONSE: Thanks for the recommendation. We will take it under consideration.
404	C.2.1.1, p. 18	Recommend moving Strategic Planning to C.2.1.2 Management Consulting Services.
		RESPONSE: Thanks for the recommendation. We will take it under consideration.
405	C.2.1.2, p. 18	Recommend adding Long-Range Planning, Futures, and Forecasting to C.2.1.2.
		RESPONSE: Thanks for the recommendation. We will take it under consideration.
406	C.3., p. 20	Recommend adding to Ancillary Support Services examples: security, guard services, access control services, call center support.
		RESPONSE: Thanks for the recommendation. We will take it under consideration.
407	F.4.1 H.6.1-H.6.10.1, p. 25	Recommend changing "within 3 calendar days" to "within 3 work days" or "within 5 calendar days."
		RESPONSE: Thanks for the recommendation. We will take it under consideration.
408	F.4.2. H.7.1., p. 26	Recommend rewording as follows: "The Contractor's Key Personnel or their official representatives shall attend and actively participate in all IDIQ program planning and performance meetings." This change addresses two concerns: 1) that either the COPM and COCM may not be available due to illness, vacation, conflicting IDIQ meetings, etc. and 2) the COPM and COCM should not be required to attend all Task Order level meetings.
		RESPONSE: Thanks for the recommendation. We will take it under consideration.
409	G.2.5., p. 29	Recommend rewording as follows: "8. Entering task order performance evaluation in the Contractor Performance Assessment Reporting System (CPARS) or in alternatives mandated by organizations that cannot use open CPARS reports."
		RESPONSE: Thanks for the recommendation. We will take it under consideration.
410	C.2.6.1., p. 30	Recommend rewording as follows: "5. Attending all OASIS Program Management Review (PMR) Meetings and other OASIS IDIQ meetings and conferences as scheduled."
		RESPONSE: Thanks for the recommendation. We will take it under consideration.
411	C.2.6.2, p. 30	Recommend rewording as follows: "7. Attending all OASIS Program Management Review (PMR) Meetings and other OASIS IDIQ meetings and conferences as scheduled."
		RESPONSE: Thanks for the recommendation. We will take it under consideration.
412	G.3.3., p. 34	Many potential Task Order customers in the National Security Community do not use eSRS. There should be alternative processes for these Government customers. Recommend adding: "...or an alternative designated by the Task Order customer."
		RESPONSE: Thanks for the recommendation. We will take it under consideration.
413	G.3.3.1, p. 34	Recommend rewording first sentence: "The ISR report is required for each contract containing an individual subcontract plan unless the Task Order customer has mandated an alternative process."
		RESPONSE: Thanks for the recommendation. We will take it under consideration.
414	G.3.3.1, p. 34; L.5.1.6, pp. 8	The 50% small business goal is too high given the nature and complexity of the work and the OASIS SB set aside. Recommend a 35% goal.
		RESPONSE: Thanks for the recommendation. We will take it under consideration.
415	G.3.3.1, p. 34; L.5.1.6, pp. 8	Task Orders subject to customer-imposed information restrictions may not permit reporting on subcontracting and socio-economic performance. These Task Orders should be set aside when GSA calculates Subcontracting Plan achievement, rather than unfairly including their value and thereby diluting overall Contractor performance.
		RESPONSE: Thanks for the recommendation. We will take it under consideration.
416	G.3.3.1, p. 34	Overall socio-economic performance on the OASIS IDIQ should only be based on completed Task Orders, since the employment of SB teammates may be front-loaded or back-loaded on any particular task, making interim evaluations misleading.
		RESPONSE: Thanks for the recommendation. We will take it under consideration.
417	G.3.3.1, p. 35	Recommend rewording first sentence: "The Contractor shall submit a Summary Subcontract Report (SSR) using eSRS unless the Task Order customer has mandated an alternative process."

		RESPONSE: Thanks for the recommendation. We will take it under consideration.
418	G.3.4., p. 35	Replace COCM with COPM, who has ultimate responsibility for program performance.
		RESPONSE: We want a program official and a contracting official.
419	G.3.4., p. 35; G.3.4.1, p. 35; G.3.4.2., p. 36	Add language allowing for alternatives to CPARS mandated by the Task Order customer.
		RESPONSE: Thanks for the recommendation. We will take it under consideration.
420	L.5.2.1, p. 85; M.5., p. 100	GSA has expressed a strong interest in Contractor experience with Cost Reimbursable contracting experience and organizational contacts. Recommend adding 100 points in the Scoring System for each project included that is Cost Reimbursable up to a maximum 500.
		RESPONSE: Thanks for the recommendation. We will take it under consideration.
421	M.5., p. 100	Over half of the total points awarded in the revised Scoring System for Past Performance are dedicated to socio-economic goal achievement. We believe this ratio does not reflect the relative challenge of performing Quality of Service, Schedule, Cost Control, Business Relations, Management of Key Personnel, and Utilization of Small Business at the Exceptional level compared with subcontracting to a diverse set of small businesses. We recommend that either 1) the points awarded for socio-economic performance under eSRS are eliminated in favor of the rating already provide within the CPAR or PPRF (Utilization fo Small Business) or 2) the subcategories for socio-economic performance (e.g., HUBZONE, SDB, WOSB) are eliminated along with their points. The latter already cause evaluation challenges because many contracts do not require reporting on some or all of these subcategories.
		RESPONSE: We have changed the points allotted for this, but we will take the recommendation under consideration.
422	L.5.4., pp.86	Recommend adding Award Fee Score as an alternative for Past Performance. Award Fee Scores are used by many programs instead of CPARS, particularly in the National Security Community. The FAR has endorsed mapping Award Fee Scores to the adjectival ratings similar to the CPAR rating and offers a straightforward mapping process for contractors and Government evaluators. FAR Subpart 16.4.
		RESPONSE: Thanks for the recommendation. We will take it under consideration.
423	L.5.4.3., p. 87	Recommend adding SF294 as alternative for socio-economic performance. Form SF294 is used by many government programs to capture socio-economic performance rather than eSRS.
		RESPONSE: Thanks for the recommendation. We will take it under consideration.
424	L.5.4.3., p. 87	Recommend adding Government Signed Letter for programs lacking alterative documentation. For those programs that do not use any standard socio-economic performance reporting mechanism, a Government Contracting Officer Signed Letter with scoring information should be acceptable.
		RESPONSE: Thanks for the recommendation. We will take it under consideration.
425	L.5.4.3., p. 87; M.5., p. 100	Recommend eliminating socio-economic subcategory ratings from consideration and instead focus on total level socio-economic performance. Many contracts that track socio-economic performance do not include some or all subcategory goals (e.g., HUBZONE, SDB). Focusing on top-line, aggregate socio-economic performance will enable direct comparison among contracts and not penalize Offerors for a Government customer only requiring a subset of socio-economic categories.
		RESPONSE: Thanks for the recommendation. We will take it under consideration.
426	L.5.4.3., p. 87	Recommend requiring a socio-economic performance score on only two Past Performance. This will eliminate the challenge presented by obtaining scores for contracts subject to information restrictions or exempt from full eSRS reporting requirements.
		RESPONSE: Thanks for the recommendation. We will take it under consideration.
427	L.5.4.3., p. 87	Recommend using CPAR or J.6. PPRF as an alternative for socio-economic performance. Both CPAR and J.6. PPRF provide top-line, aggregate scores for socio-economic performance under Utilization of Small Business. Requiring eSRS scores at this level is redundant.
		RESPONSE: Thanks for the recommendation. We will take it under consideration.
428	New template in Section J; new paragraph in Section L titled Relevant and Past Performance for Contracts Subject to Information Restrictions	Some programs subject to information restrictions, particularly in the National Security Community, are unable to identify many facets of their programs, such as their SOW, precise dollar value, official program name, etc. Recommend the development of a new template that captures both Relevant Experience and Past Performance focusing exclusively on the information necessary for the M.5. Scoring System. This form can be filled out in a manner parallel to the current J.6. PPRF (i.e., the Offeror works with the Government Contracting Officer to validate and in this case sign the form).
		RESPONSE: Thanks for the recommendation. We will take it under consideration.
429	New paragraph in Section L titled Relevant and Past Performance for Contracts Subject to Information Restrictions	Recommend ensuring Offerors have a minimum 6 weeks from the time of the RFP drop to obtain approvals for Government Signed Alternative Templates for contracts subject to information restrictions.Provides sufficient time for most contracts subject to information restrictions to follow an official approval process to release information outside their agency.
		RESPONSE: Thanks for the recommendation. We will take it under consideration.
430	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: Thanks for the recommendation. We will take it under consideration.
431	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: Thanks for the recommendation. We will take it under consideration.
432	L.5.5.11.1, p. 91; M. 5, p. 101	Experience in managing large multiple-agency or agency-wide MA-IDIQ programs is more important than a PMP certification or Masters Degree that might only be a week old. Recommend scoring years of experience significantly higher than other COPM factors or focus COPM rating on years of experience exclusively. Recommend that the government score total years of experience in program/project performance and management of contracts and task orders encompassing at a minimum 2 of the disciplines supported under OASIS. Additionally, recommend that more points be assigned if management experience and past performance covers more than 2.
		RESPONSE: Thanks for the recommendation. We will take it under consideration.

433	L.5.5.11.1, p. 91; M. 5, p. 101	Recommend that the requirement be modified for the Masters Degree in Program/Project management or Core Discipline under OASIS. These requirements are more appropriately required at the task order level. Suggest that the requirement and scoring be revised to consider years of experience in providing core discipline technical services to the government as a substitute for the Masters Degree. RESPONSE: Thanks for the recommendation. We will take it under consideration.
434	L.5.5.11.1, p. 91; M. 5, p. 101	Suggest that the requirement for a PMP is more appropriate at the task order level, and recommend that it not be a scoring factor for the OASIS master contract vehicle. Successfully managing a government-wide IDIQ contract is significantly different than managing a technical services task order, with much of the effort focused on outreach and business development activities. RESPONSE: Thanks for the recommendation. We will take it under consideration.
435	L.5.5.11.2, pp. 91-2; M. 5, p. 101	Experience in administering large multiple-agency or agency-wide MA-IDIQ is more important than a Masters Degree or NCMA certification. Recommend scoring years of experience significantly higher than other COCM factors or focus COCM rating on years of experience exclusively. RESPONSE: Thanks for the recommendation. We will take it under consideration.
436	L.5.5.11.1; p. 85	Current requirements for the Corporate OASIS SB Program Manager (COPM) include a minimum of 5 years of experience, a Master's in Program Management or other OASIS core discipline, and at least one program/project management certification. Given that the core disciplines span a wide range, it is recommended that a PhD in one of those core disciplines is given additional weight and can perhaps account for less years of experience. In addition, it is recommended that the requirement for a certification be dropped, as actual experience managing projects and programs demonstrates more about a person's ability than a certification. There could be the case where someone has a certificate but only 5 years of experience; currently, that person is given the same score as someone with 15 years of experience. RESPONSE: Thanks for the recommendation. We will take it under consideration.
437	L.5.3.1, p. 81	Current requirements for relevant past experience includes that each project has "been completed within the Past Five (5) Years prior to the solicitation closing date or be ongoing with at least One (1) Year of performance completed prior to the solicitation closing date." Recommend adjusting the requirement for one year of performance to be completed for two reasons. First, it seems that ongoing work that is, for example, 8 months into the contract may be more relevant than work that occurred four years ago. Second, given that there is no minimum requirement for the total length of the project, it could be that the contract itself is for only one year in duration. Therefore, consider dropping the "one year completed" requirement or adjusting to require 50% of a contract's period of performance be completed. RESPONSE: Thanks for the recommendation. We will take it under consideration.
438	L.5.4.1, Page 82	GSA seems to prefer CPARS for Past Performance reporting. Pool 4 offerors will most likely come from Research and Development where many of the contracts are funded with 6.1 (Basic Research), 6.2 (Exploratory Research), or 6.3 (Advanced Technology Development) funds, which are typically exempt from CPARS reporting. Additionally, any classified work cannot be reported in CPARS. For this reason, CPARS will not be available for many Pool 4 offerors. Will this be taken into consideration? RESPONSE: Please provide recommendations.
439	B.1.5. Contract Access Fee (CAF), page 11; G.3.1. Contract Access Fee (CAF), page 31	For large task orders, GSA may wish to consider a CAF cap. A CAF cap has been introduced on several other large Federal IDIQs and has proven to encourage greater participation by all agencies, increase the IDIQ's competitiveness with the CAFs of other agencies/vehicles, and overall, enhance the marketability of the IDIQ contract. RESPONSE: Thanks for the recommendation. We will take it under consideration.
440	E.1. Inspection and Acceptance, page 22	Section E.1., Inspection and Acceptance, currently provides the FAR clause for fixed price task orders. We recommend that the master contract include reference to the Inspection and Acceptance clauses for all relevant contract types (Fixed Price, Cost Reimbursement, Time and Materials, and Labor Hour). The inclusion of these clauses will expedite each OCO's preparation of their Task Order solicitations. RESPONSE: The appropriate clauses will be included at the task order level. Additionally, Mandatory and applicable clauses automatically flow down to task orders in accordance with Section I.1.
441	F.4.1. Deliverable and Reporting Requirements, page 24	The Deliverable and Reporting Requirements table specifies a three-calendar day response time for notifying GSA of any updates to system or certification status. In many large companies, systems and certification, such as those required for OASIS, are managed by different groups that are often not co-located with the contracts group. We recommend that the frequency of response be changed to 45 days after an update or change in status. RESPONSE: We are implementing this.
442	G.2.6.2. Corporate OASIS Contract Manager (COCM), page 30	Typically in industry, Contracts Managers conduct negotiations but do not have the authority to contractually commit the company. It would be more in keeping with common business practice in our industry to convey this requirement to the OASIS Program Manager position. Please consider amending the requirement. RESPONSE: That has not been our experience, but we will consider the recommendation.
443	H.4.2.1. NAICs Pools, pages 41-42; H.6.7. AS9100 Certification, page 45; and M.5. Scoring System, page 101	Under M.5. Scoring, Systems, Certifications, and Resources, paragraph L.5.5.7. allocates a maximum of 50 points for AS9100 Certification. However, as noted in H.6.7., AS9100 is a quality management system specific to the aerospace industry and therefore applicable only to the NAICS Codes in Pools 3, 5, and 6. We recommend that points for the AS9100 Certification be scored only for Offerors proposing in Pools 3, 5, and 6. RESPONSE: Please see previous responses to this recommendation.
444	H.6.1. Adequate Accounting System through H.6.9. Earned Value Management System, pages 42-46; H.7.2. GSA OASIS Webpage, page 49	Draft RFP Sections H.6.1. through H.6.9. state that the OASIS website will maintain a record of each OASIS Contractor's systems status. Systems status is almost universally regarded by contractors as proprietary and competition sensitive, and we believe this data should not be made available to other OASIS contract holders, other companies, or the general public. Specifically, the status of a Contractor's DCAA/DCMA-audited systems (Accounting, Estimating, and Purchasing), and CAS compliance are highly proprietary. Please confirm that a list of Contractor's Systems, Compliances, and Certifications will be made available only to the OASIS COs and OCOs. RESPONSE: Please see previous responses to this recommendation.

445	L.5.5.4. Forward Pricing Rate Agreements and/or Approved Billing Rates, page 89	The Forward Pricing Rate Recommendation comes from DCMA and is often used as a Forward Pricing Rate Agreement. Please update the FPRA references to include FPRRs.
		RESPONSE: We shall. Thank you.
446	L.5.5.10. Facility Clearance Level (FCL), page 91	Per NISPOM regulation, FSOs do not grant or determine Facility Clearance Levels. This activity is completed by a Cognizant Security Agency. We request that the requirement be changed to: providing the 381r letter and ISFD form from the Cognizant Security Agency, inclusive of the Facility Clearance Level status, the FSO's name and phone number, as well as the name and contact information for the Cognizant Security Agency representative.
		RESPONSE: Thank you for bringing this to our attention. We shall investigate and edit accordingly.
447	L.5.5.11.2. Corporate OASIS Contract Manager (COCM), pages 91-92	Will GSA accept Certifications for the COCM that are not from NCMA, but from other recognized professional/accredited organizations or institutions? For example, a Defense Acquisition Workforce Improvement Act (DAWIA) certification, a Procurement and Contracts Management Certificate Program from an accredited University or College, or an International Association for Contract and Commercial Management (IACCM) certification.
		RESPONSE: Please see previous responses to this question.
448	N/A	Industry partner commitment is demonstrated to both Small Business and GSA through support of the the Mentor Protégé program. Would GSA consider providing an Offeror points if there is an existing, active GSA Mentor Protégé program in place?
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
449	L.5.3.1m page 85 and L.5.4.2, page 86	Item #6 states "At least Three (3) out of Five (5) projects must be for work that was for the Federal Government under a contract or task order awarded by the Federal Government." Further, L.5.4.2. Past Performance (Proposal Submission, if applicable) states"... If any of the relevant experience projects are Non--Federal projects, Socio--economic past performance will not be considered." Since only 3 of 5 past performances are required to be Federal, Is GSA going to limit Small Business evaluation to 3 of the 5 past performance candidates? Subjecting 3 out of the 5 past performances to SB evaluation would "level the playing field" for offerors who aren't providing services solely to the Federal Government.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
450	M.5, page 100 and L.5.4.3, page 87	According to the FAR, any Federal government contract (over \$650,000) has SB goals. However, not every contract sets specific SB socio-economic goals (for example, some may have a HUBZone requirement but others do not). To encourage Offerors to select their representative past performance to demonstrate their capabilities rather than selecting the past performance to get the higher scoring for SB performance in all socio-economic areas, would GSA consider dropping or reducing the additional 40 points for each individual SB goal and providing a higher grade for the overall, all-inclusive SB performance?
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
451	G.2.6.1. Corporate OASIS Program Manager (COPM) and G.2.6.2. Corporate OASIS Contract Manager (COCM), both page 30.	Recommend to allow education/experience substitution. For example as seen on schedules: GSA Schedule equivalency table *Substitution/Equivalency for all requirements above GED or vocational degree = high school diploma AS/AA degree = two years general experience BS/BA = six years general experience MS/MA = four years general experience PhD = three years general experience Example: MS/MA degree = BS/BA + four years of general experience
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
452	L.5.5.9, p. 90 and M.5, p. 101	An effective EVMS provides increased visibility of project schedule and financial performance to stakeholders, and helps to reduce project risks. Given the expectation that large, complex task orders will be issued through OASIS, the benefits of EVMS are clear. In light of the obvious value that EVMS brings to OASIS, we recommend that a Government-audited EVMS be afforded the same point scoring as a CMMI or ISO certification.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
453	L.5.5.9, p. 90; M. 5, p. 101	Based on the effort being performed, the CMMI Institute has structured CMMI under three models; CMMI-DEV (Development), CMMI-SRV (Services), CMMI-ACQ (Acquisition). As all three models have relevance to OASIS, having established processes in more than one area clearly differentiates one OASIS offerors from another. While CMMI-5 represents a greater level in maturity than CMMI-3, CMMI-3 is the recognized standard to demonstrate a mature process. During this time of fiscal frugality, agencies could find themselves hard pressed to justify the additional costs associated with the higher level certification. Furthermore, it does not necessarily equate to 200% more value to the government, which would suggest a more appropriate weighting be considered. The following points model recognizes coverage in more than one model as well as an appropriate rating for increasing capability from 3 to 5. For EACH Interest Area (DEV, ACQ, SRV) - CMMI 3 = 300 points - CMMI 4 = 350 points - CMMI 5 = 400 points Maximum possible points across all areas = 400 * 3 = 1200
		RESPONSE: Thank you for the recommendation. We will take it under consideration.

454	B.2.1 p.11	(1) Under the SOC system, defining labor categories as Junior, Journeyman and Senior, all requiring degrees without equivalency in terms of years of experience appears unrealistic, particularly for veterans who typically have significant experience, but may not necessarily have a formal education. (2) Many of the labor categories described in the solicitation do not relate easily to the scope of the contract, thereby requiring a crosswalk to more recognizable labor categories associated with the core disciplines in a task order. Requiring any deviations from those in the solicitation to be clearly identified in proposals adds to the complexity. Further, grouping the labor categories corresponding to groups of SOC Numbers, Titles and Functional Descriptions even if the multiple SOC numbers within each labor category group have similar salaries based on the BLS data all add to complexity. We recommend consideration be given to a more straightforward approach. For example, for Logistics, a candidate set of labor categories could include: Logistician, Logistics SME, Inventory Specialist, Warehouseman, RAM Engineer, etc which would be understandable, and usable by customer Government agencies. This would be easier to use for our mutual customers.
		RESPONSE: We are considering equivalencies for degrees. We do not agree with the SOC structure as being complex. We feel that it is just different than what is traditionally done and appears complex as a result. After reviewing thousands of labor categories in the professional services realm, the one consistent observation we have had is that there is no Industry standard. Our clients constantly provide us feedback that vast arrays of labor categories, descriptions, and standards is confusing and problematic. Thank you for the recommendation, however, and we will take it under consideration.
455	B.2.1 (p. 11+), G.3.2.1.1. (p. 32+), L.6. VOLUME 6 – COST/PRICE (p. 92+)	In our experience, the BLS SOC proved to be problematic for work on military bases. For example aerospace or electronic engineer data for Air Force operations at Vandenberg Air Force Base (Lompoc CA) and Whiteman AFB (Knob Knoster MO) are not in counties covered by BLS. The problems were further complicated because we only needed people for less than a year which drove up costs. One of our staff, formerly a Govt employee, also supported offices in four different locations in VA and MD that were basically in four very different wage areas as opposed to the one BLS metropolitan area. For example, the Office closest to Baltimore could hire at lower rates than Virginia offices. Making exceptions for OCONUS and classified work is already included in OASIS, however allowing a comparable exception for short-term work should be added as well.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
456	B.2.5.1, p. 13, L.6, p. 92	Is the Bureau of Labor Statistics reference in this section intended to be to the Employment Cost Index (ECI)? If so, we would recommend that an appropriate index and series be identified as reflective of the occupations covered by OASIS (e.g., ECI for Total Compensation (not seasonally adjusted), private industry workers, service-providing industries).
		RESPONSE: Please provide a recommendation for an index.
457	B.3.6, p. 15	Section B.3.6. In order to avoid any misinterpretation, we would recommend that this section also include a statement that "The Contractor may apply indirect costs to materials and equipment in accordance with the Contractor's usual accounting practices," similarly to what appears in B.3.5 with respect to travel.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
458	C.2.1.1, p. 17; J.1, Attachment 1	In looking at the core disciplines in conjunction with the candidate labor categories, it does not appear that there is a logical mapping between them. For example, e-Business support, social media consulting, knowledge management, integration, among others, do not have associated labor categories that easily fit these skills. Some of the service areas have an "IT flavor" that is used to support the principal disciplines, but there is no apparent equivalent labor category. Similarly there are service areas such as Security, Safeguarding Personal Data, Training and Faciliation which also do not have labor categories that easily map. Using subject matter experts as a catchall would distort the hourly labor rate min and max. We recommend additional categories be added to reflect these services, for example, Information Scientist might cover the first set, whereas Security analyst, and Trainer, might cover the second set.
		RESPONSE: Please bear in mind that the examples provided in Section C do not define scope, but we understand the intent of your recommendation and will take it under consideration.
459	F.4.2, p. 25-37; G.3.5, p.36	There is a requirement in these sections that the Contractor shall submit timely and accurate task order close-out reports and provide the OCO the final invoice, release of claims, and all other required close-out documents within 60 calendar days after task order completion. This 60 day requirement is greatly reduced from the standards noted at FAR 4.804-1 regarding closeout of contracts. While it may be possible to close out a firm fixed price task order within 60 calendar days after task order completion, there are challenges to doing so on T&M/LH and Cost type orders. Primarily, the requirement to have settled on indirect cost rates and the backlog that currently exists at DCAA on those rate settlements. On that basis, we would recommend that this requirement be revised to only apply to firm fixed price task orders, and that closeout of T&M/LH and Cost type orders be revised to occurring subsequent to the settlement of indirect rates, absent the ability to conduct a quick closeout.
		RESPONSE: We are editing the language of this section.
460	G.2.6.1, p. 30 and L.5.5.11.1, p. 91	It is not clear why a Quality assurance qualification for COPM is needed since presumably QA would be critical at the Task Order level. We recommend this qualification be deleted and replaced with Offerors having the necessary infrastructure to support timely, accurate and complete task order reporting.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
461	G.3.1, p. 31	This section states in part that on all task order solicitations, regardless of contract type, the Contractor shall include CAF in their cost or pricing proposals. Further, 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). Given that CAF is not included in the T&M/LH rates, the method for identifying the CAF on T&M/LH orders needs to be addressed. While the OCO may have discretion in this regard, a separate CLIN for all CAF is preferred and especially if a cap on CAF is part of the final RFP and resulting contract.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.

462	H.4.2.1. p.40	<p>(1) The NAICS pools utilized to define the business size standard are not meaningful at the OASIS Unrestricted contract level and lead to confusion. OCOs are familiar with NAICS codes but not with NAICS pools. Requiring OCOs to determine the predominant NAICS code applicable to a TO, along with the Title, Business Size Standard in the task order solicitation and then report the NAICS Code in the Federal Procurement Data System (FPDS) should be sufficient. The pools are unnecessary on the OASIS Unrestricted contract and we recommend their deletion. (2) The NAICS Pools and the establishment of business size for each may frustrate what is intended under Section 1341 of the Small Business Jobs Act (http://www.gpo.gov/fdsys/pkg/PLAW-111publ240/html/PLAW-111publ240.htm). Specifically, the submittal of a bid or proposal would be considered a deemed certification of small business size and status. To avoid a potential conflict with this provision of the Public Law, we recommend the elimination of the NAICS Pools on the OASIS Unrestricted and OASIS SB solicitations and establishing a predominant NAICS Code under each. Then each task order proposal under would include a deemed certification requirement per Section 1341 which ensures that orders are awarded to those primes who are considered small at that time for each task order and the associated NAICS Code for it. This approach would be consistent with the stated purpose in SBA's Proposed Rule 2012-11317 that was cited in establishing the Pools, which is to ensure that agencies receive credit only for awards to small businesses and to ensure that only small businesses receive the benefits afforded to such business concerns.</p>
		<p>RESPONSE: We feel that the Pools are meaningful on the OASIS contract. There are two primary reasons that we have Pools on the unrestricted contract. First, we want to ensure that we have adequate competition for all potential OASIS requirements. OASIS has a very broad scope and we expect that the OASIS contractors will be very savvy regarding the opportunities that they pursue based upon their primary core competencies. For example, some contractors may specialize in R&D work and some may specialize in military engineering but not be interested in R&D work. Some companies simply don't do development work because it causes OCI issues for their corporate structure, while other companies focus specifically on development work. Accordingly, we felt Pools for the OASIS contract would help ensure adequate competition levels for all requirements.</p> <p>Second, we felt that the establishment of Pools may theoretically make it easier for graduating small businesses on OASIS SB to be able to on-ramp to OASIS. Furthermore, we see absolutely no conflict with public law and definitely see absolutely no reason to assign a primary NAICS code to each OASIS SB Pool as that will only create more confusion without adding any additional value or information</p>
463	H.6.1-H.6.9, p. 42-45; H.6.10.1, p. 46	<p>The information regarding system/compliance/certification status identified as being posted on the GSA's OASIS website may be considered company sensitive/proprietary in nature. On that basis, we recommend that any posting of this information on the GSA OASIS website be limited to access by Government personnel only.</p>
		<p>RESPONSE: Please see previous responses to this recommendation.</p>
464	H.6.6 and H.6.7, p. 45	<p>The Govt has specified two quality certifications - ISO9001:2008 and AS9100, the latter of which is applicable only to the aerospace industry. Why is GSA including the latter certification in this solicitation since it has a narrow application? We recommend GSA consider certifications that are explicitly related to the full scope of the core disciplines, e.g., ISO20000.</p>
		<p>RESPONSE: Our intent was to include any and all certifications that would be applicable within the range of services that could be performed under OASIS. We will consider the recommendation.</p>
465	H.6.13	<p>This section identifies the applicability of FAR 52.237-3, Continuity of Services, to all OASIS task orders unless otherwise specified by a customer agency deviation to this clause in an individual task order award. Per FAR, the clause is intended to be utilized when services under the contract are considered vital to the Government and must be continued without interruption and when, upon contract expiration, a successor, either the Government or another contractor, may continue them; and the Government anticipates difficulties during the transition from one contractor to another or to the Government. Some examples provided where use of the clause may be appropriate are services in remote locations or services requiring personnel with special security clearances. Given the significance of requirements within this clause and that determination of applicability is based on task level requirements, we recommend that the approach be revised to require OCO determination of applicability.</p>
		<p>RESPONSE: Thank you for the recommendation. We will take it under consideration.</p>
466	H.9.3, p. 51	<p>This section states that the OCO may require that the Contractor sign an Organizational Conflict of Interest (OCI) Statement in which the Contractor (and any Subcontractors or teaming partners) agree not to submit any proposal or provide any support to any firm which is submitting (as Prime or Subcontractor) any proposal for any solicitation resulting from the work on a specific task order under OASIS. While this language appears to address future procurements resulting from providing systems engineering and technical direction, it is overly broad and may place unnecessary restrictions on competing for future procurements. Given that OCI issues are complex and have the potential to be mitigated, we recommend that the language reference FAR Subpart 9.5 for approach and procedures for addressing OCI.</p>
		<p>RESPONSE: Thank you for the recommendation. We will take it under consideration.</p>
467	H.12, p. 54	<p>The approach of placing contractors into a "Dormant Status" introduces a new classification which is not currently supported by law and regulation. While the importance of remaining compliant and delivering quality services is incumbent upon any successful contractor, there may be unintended consequences of utilizing a new mechanism such as placing contractors into a dormant status. As an alternative, we recommend that the use of CPARs to record any performance issues that might be a consideration on receipt of future awards would seem to be an approach for consideration.</p>
		<p>RESPONSE: We have vetted Dormant Status with our legal department and are confident that we are in good standing regarding this issue.</p>
468	J.1, p.3	<p>There is currently a single Subject Matter Expert category that is intended to cover all of the disciplines in OASIS. Given the range of expertise that a SME for each discipline requires, we recommend including a separate SME category for each discipline. In addition, to provide more flexibility and pricing in skill levels, we suggest having two experience levels for this category. Senior and Master.</p>
		<p>RESPONSE: Thank you for the recommendation. We will take it under consideration.</p>

469	L.5.3.1, p. 85 and M.5, p. 100	In the first OASIS draft solicitation, GSA indicated in Section 5.3.1 that at least on project must be for work performed under a CR contract type, but no points were allotted to this factor in Section M.5. On Friday April 19, GSA announced a change, that this requirement was deleted. Given that one of the initial and fundamental features of OASIS was the capability to use Cost Reimbursable contract, we had expected points to be re-allocated in M.5 to demonstrate relevant experience. All arguments for OASIS from the earliest discussions of Integrations to the present, along with the OASIS Business Case, recognize the need to incorporate the use of Cost Reimbursable contracts, e.g., Seaport-e which has over 2500 awardees. As has been often stated, Relevant Experience along with Past Performance is still one of best predictors of future success. The incorporation of points for at least one example of relevant experience as a cost reimbursable contract types reinforces the importance of this basic feature of the intent of the contract. We recommend GSA emphasize the importance of cost reimbursable contracts with the award of points, e.g., comparable to that for "Projects include Ancillary Support", currently with a point value of 100.
RESPONSE: We will be incorporating this suggestion. Details to follow shortly.		
470	L.5.3.1, p. 85 and M.5, p. 100	Using contract award value based on yearly average is problematic. We recommend the use of total contract value including options with the minimum total award value being at least \$5M/yr for 5 years or \$25M.
RESPONSE: We do not agree.		
471	L.5.5.6 p.89 ; L.5.5.7 p.90; L.5.5.8, p. 90	Since Section L.3 has been modified to remove the language about requiring the Parent Company to be the Offeror and allowing the affiliate, division and/or subsidiary for relevant experience examples and systems based on a meaningful relationship and commitment, certifications should be handled similarly by: a. Describing the "meaningful relationship" between the affiliate, division and/or subsidiary of the Offeror for purposes of OASIS. b. The Offeror provides the Government with a "commitment letter" from the affiliate, division and/or subsidiary of the Offeror which demonstrates the "meaningful relationship" and the resources that will be devoted by the affiliate, division and/or subsidiary to OASIS. Further, we would also request that Systems, Compliances, and/or Certifications issued to the parent of an offeror company and which apply to its affiliates and/or subsidiaries also be considered acceptable for the submittal of any supporting documentation.
RESPONSE: Thank you for the recommendation. We will take it under consideration.		
472	L.5.5.11.1 p.91	The minimum experience requirement of 5 years for the COPM is meaningful with scoring in M.5 reflecting elevated scores for 10 and 15 years of experience. Encouraging the COPM to have a Master's Degree in Program/Project Management or other discipline relevant to the 6 core disciplines under OASIS and at least one professional program or project management certification from the five Project Management Institute (PMI) certification programs listed, would be far less important at the contract level than at the Task Order level and significantly less important than the experience of promoting and managing multiple award, multiple agency or agency-wide contract vehicles, which is the principal responsibility of the COPM. We recommend that equivalent years of experience be substituted for Master's degree and PMI certification and that scoring for years of experience be allotted more points than a Master's degree and PMI certification. In addition, another key element worthy of consideration and scoring is the management infrastructure and systems to support the management and execution of the OASIS contract and Task Orders. The systems and infrastructure along with established processes and procedures are commonly included in an existing Program Management Office and would be critical to managing multiple complex task orders. This established and
RESPONSE: Please see previous responses to this recommendation.		
473	L6., p. 92	Junior, Journeyman and Senior Labor Categories all have years of experience and degree requirements. Junior labor category requires up to 3 years of experience and a BA/BS degree. Journeyman labor category requires 3-10 years of experience and a BA/BS or MA/MS degree. Senior labor category requires over 10 years of experience and a MA/MS degree. Degree requirements are over-emphasized and should include years of experience equivalency for the various degree requirements. Such stringent degree requirements typically impact the hiring of certain groups within the workplace such as veterans with significant experience but no degree. Years of experience requirements for labor categories are typically expressed in terms of the minimum experience required instead of "up-to" or a range.
RESPONSE: Thank you for the recommendation. We will take it under consideration.		
474	L.6.2, p. 93	A company's indirect rates are not fixed and typically are adjusted at least annually in accordance with FPRA (Forward Pricing Rate Agreements). This should be permitted in the template.
RESPONSE: Thank you for the recommendation. We will take it under consideration.		
475	M.5, p. 100-101	Several comments: (1) An estimated 25% of the score is weighted towards Systems, Certifications and Resources, 33% is weighted towards Relevant Experience, and 42% is weighted towards Past Performance. Given the emphasis on Relevant Experience, we would have expected that a greater percentage of points be allocated to that criteria. An alternate ratio might be 45% for Relevant Experience, 35% for Past Performance, and 20% for Systems, Certifications and Resources or some similarly weighted allocation. This has the benefit of relying more on experience and actual performance which seems more aligned with the intent of OASIS. (2) We agree with weighting Federal projects more heavily on Past Performance since all of OASIS' customers will be Federal customers (3) Recommend adding other ISO certifications for best practices, e.g., ISO 20000. (4) Recommend equivalent years of experience be permitted in place of a master's degree for the COPM and the COCM.
RESPONSE: Thank you for the recommendations. We will take them under consideration. However, your recommendation to make relevant experience the number one weighted criteria over Past Performance is contrary to the majority of feedback we have received. We are unlikely to change this.		

476	Page 95, M. 5, Scoring System Table, Volume 5, L.5.5.3, L.5.5.5 and L.5.5.6 through L.5.5.9	The appearance of providing offerors an opportunity to submit a responsive bid without offerors being required to possess the business systems described in the Scoring System Table references L.5.5.3, L.5.5.5 and L.5.5.6 through L.5.5.9 yet at the same time providing offerors who possess these business systems the opportunity to score more points creates an unlevel playing field. Offerors who traditionally provide Professional Services in general do not possess a DCMA/DCAA acceptable Estimating System, Purchasing System nor do they possess the comprehensive CMMI Maturity certifications cited in the draft RFP. We request GSA reexamine the necessity to encourage offerors to possess these business systems. There are 1100 potential points associated with these business systems. Many firms may choose not to bid given the cost of preparing a proposal knowing going into this procurement effort that the most points they may score in the Government's evaluation of Volume 5 is 500 points. We request the business systems referenced herein be removed from the draft RFP to include the Scoring Table.
		RESPONSE: Absolutely not. The large majority of professional services dollars spent by the US Government is spent by the Department of Defense. These systems are valuable to them and represent value to any federal client.
477	G.3.2.3, Page 33	#5. Typically, we bill cost reimbursable by line item/element of cost (i.e. direct labor, fringe, OH, ODC, G&A, etc.), the requirement to invoice using the direct labor rate for each Contractor employee is overly burdensome and does not adhere to the goals of performance based contracting (FAR 37.102) Please consider removing this requirement.
		RESPONSE: We will consider this recommendation, but are unlikely to implement it. Furthermore, this has nothing whatsoever to do with performance based contracting.
478	M.5 (pages 94-95)	The Scoring System table begins listing CMMI Maturity at Level 3. Successful CMMI appraisal denotes maturity *in software and systems integration processes only*, whereas OASIS has a focus mainly on non-IT requirements. Therefore, for OASIS, achievement of any CMMI appraisal level indicates that an organization appreciates the value of continual improvement and process maturity. In addition, the differences between CMMI Levels 2 and 3 are not significant enough in terms of GWAC management or company capabilities to warrant a higher rating for Level 3 or, indeed, no/fewer evaluation points for Level 2. We recommend that all CMMI levels are scored equal to each other for the purposes of OASIS proposal evaluations.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
479	B.2.5.1	As Government required overtime may be a component necessary to accomplish task order requirements, recommend changing sentence to read "Based on the specific task order requirements, the OCO is authorized to exceed the OASIS ceiling rates for those labor categories that include Secret/Top Secret/SCI labor, OCONUS locations, or overtime, if necessary."
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
480	B.3.2	Recommend adding language "OCO is authorized to exceed the OASIS ceiling rates for those labor categories subject to Service Contract Act in order to ensure compliance with applicable wage determinations."
		RESPONSE: This won't be applicable as there are no OASIS labor categories that are subject to SCA.
481	B.3.3	Recommend adding language "OCO is authorized to exceed the OASIS ceiling rates for those labor categories subject to Davis Bacon in order to ensure compliance with applicable general decisions."
		RESPONSE: This won't be applicable as there are no OASIS labor categories that are subject to Davis Bacon.
482	G.2.6.2. page 30	There is a requirement for small businesses to have Contract Managers with a minimum of 5 years experience in negotiating and administering IDIQ, multiple award, multiple agency, or agency-wide contract vehicles including all pricing types and contract life-cycles. We recommend eliminating this requirement for small businesses.
		RESPONSE: Please include a rationale for this recommendation.
483	B.2	Propose to include Performance-Based task orders
		RESPONSE: Performance based task orders are allowed under the OASIS contracts.
484	Section M.5 Scoring System	Based on the current scoring system, the chances for small businesses to get selected seems to be slim to none. Can this be revised to enable the inclusion of real small businesses. For example, under the relevant experience, business with \$50m project experience per year will get more points and they score even higher when the number of such occurrences is more. However, those businesses are less likely to be small businesses.
		RESPONSE: We are establishing an entire contract (OASIS SB) for nothing but Small Businesses.
485	Section L.5.3 Relevant Experience	Even with the Government lowering the Relevant Experience scoring criteria to \$2M, \$4M, and \$6M respectfully, would the Government consider lowering the scoring for different NAICS bid pools?
		RESPONSE: We will consider it, but are unlikely to do so.
486	L.5.1.6	The small business subcontracting goal of 50% is higher than the current SBA requirements. Would the government lower this to meet the SBA standards?
		RESPONSE: We will consider it, but are unlikely to do so.
487	L.5.3.1	The \$5M threshold for past performance qualifications could force offerors to not submit relevant work history that does not meet the dollar limit. Will the government consider lowering this amount or implementing a tiered approach?
		RESPONSE: We will consider it, but are unlikely to do so.

488	Section L.3	<p>Section L.3 – INSTRUCTIONS requires that the “for Systems, Certifications, and Resources, the proposal submission must be in the official legal bidding entities name as identified on the SF 33.”</p> <p>Companies that have established Joint Ventures under other IDIQ vehicles such as the GSA Alliant IDIQ GWAC and the DHS EAGLE IDIQ contracts may not be able to participate as a Joint Venture company on the OASIS IDIQ because the Systems, Certifications and Resources are normally maintained by the holding member companies.</p> <p>Suggest mirroring Systems, Certification and Resource requirements in accordance with the amended Section L language under the GSA Alliant solicitation, or alter the current L.3 language to read as follows: “for Systems, Certifications, and Resources, the proposal submission must be in the official legal bidding entity’ name as identified on the SF 33, or if the award is under a CTA or Joint Venture, each CTA or Joint Venture member company shall provide copies of the Systems, Certifications and Resources with its proposal submission.”</p>
<p>RESPONSE: Please see previous responses to the same or similar recommendations.</p>		
489	Section L.5.1.6	<p>Section L.5.1.6 – Subcontracting Plan states that “There are 2 types of Subcontracting Plans (Individual and Master). GSA strongly encourages Offerors to submit and Individual Plan for OASIS.” In this same section, GSA provides requirements for both individual plans and master plans.</p> <p>This section creates confusion since GSA states its preference yet allows the contractors to submit a master plan.</p> <p>Suggest only requiring contractors to submit an individual plan in order to eliminate confusion.</p>
<p>RESPONSE: We would like to, but we cannot dictate which plan is submitted.</p>		
490	Section L.5.1.7.	<p>Section L.5.1.7. Existing Contractor Team Arrangement (CTA) states “This Section ONLY applies if an Offeror is proposing as an existing CTA Partnership or Joint Venture who has relevant experience, past performance, and systems, certifications, and resources from their existing CTA.”</p> <p>Companies that have established Joint Ventures under other IDIQ vehicles such as the GSA Alliant IDIQ GWAC and the DHS EAGLE IDIQ contracts may not be able to participate as a Joint Venture company on the OASIS IDIQ because the Systems, Certifications and Resources are normally maintained by the holding member companies.</p> <p>Suggest mirroring Systems, Certification and Resource requirements in accordance with the amended Section L language under the GSA Alliant solicitation or alter the current L.5.1.7 language to read as follows: “This Section ONLY applies if an Offeror is proposing as an existing CTA Partnership or Joint Venture who has relevant experience, past performance, and systems, certifications, and resources from their existing CTA or Joint Venture member companies.”</p>
<p>RESPONSE: Thank you for the recommendation. We will take it under consideration.</p>		
491	Section M.4.4.1.	<p>The last sentence in Section M.4.4.1. Past Performance states that “Offerors are strongly cautioned that inability of the Government to contact references, verify information, or receive responses to surveys may result in ineligibility for award.”</p> <p>The Contractor should not be at fault and risk eligibility for award if its Past Performance reference is unavailable to speak with GSA representatives when validating information.</p> <p>We suggest changing the sentence to read as follows: “Offerors are strongly cautioned that inability of the Government to contact references, verify information, or receive responses to surveys may result in <u>the Past Performance not being evaluated when determining ineligibility for an award.</u>”</p>
<p>RESPONSE: Thank you for the recommendation. We will take it under consideration.</p>		
492	Section H.6.	<p>Although related to Section L.3 – INSTRUCTIONS, Section H.6. SYSTEMS, COMPLIANCES, AND CERTIFICATIONS have similar restrictions in which “All other Systems, Compliances, and Certifications must be maintained at the Contractors current level at time of award or higher throughout the period of performance of OASIS. Furthermore, all Systems, Compliances, and Certifications shall be in the Contractor’s official legal name as identified on the OASIS award document. Systems, Compliances, and/or Certifications from a Subsidiary and/or Affiliate of the Contractor will not be considered.”</p> <p>Companies that have established Joint Ventures under other IDIQ vehicles such as the GSA Alliant IDIQ GWAC and the DHS EAGLE IDIQ contracts may not be able to participate as a Joint Venture company on the OASIS IDIQ because the Systems, Certifications and Resources are normally maintained by the holding member companies.</p>
<p>Suggest mirroring Systems, Certification and Resource requirements in accordance with the amended Section L language under the GSA Alliant solicitation or alter the current H.6 language to read as follows: “All other Systems, Compliances, and Certifications must be maintained at the Contractors current level at time of award or higher throughout the period of performance of OASIS. Furthermore, all Systems, Compliances, and Certifications shall be in the CTA or Contractor’s official legal name as identified on the OASIS award document. Systems, Compliances, and/or Certifications from a Subsidiary and/or Affiliate of the Contractor will not be considered. Notwithstanding the foregoing, if the Contractor is a CTA or Joint Venture, the requirements of this Section H.6 shall be met if Systems, Compliances, and/ or Certifications are provided by each CTA or Joint Venture member company.”</p>		
<p>RESPONSE: We will consider it, but are unlikely to do so.</p>		

493	Section H.7.5.	<p>Unlike the GSA Alliant GWAC, Contractors acknowledge that the OASIS IDIQ will have more teeth with its off-ramp clause as there are currently seven (7) different clauses that may allow the Government to remove a Contractor from OASIS.</p> <ul style="list-style-type: none"> • F.4 Performance Standards • G.3 Contract Administration Requirements • H.6 Systems, Compliances and Certifications • H.7 Partnering • H.7.5 Minimum Task Order Awards • H.9 Ethics and Conduct • H.13 Off Ramping failures <p>While we fundamentally agree that the Government should have the ability to remove Contractors for failing to perform or market the contract, Section H.7.5 Minimum Task Order Awards raises concerns with the requirements of this clause. Specifically, the Government states that upon a Notice-to-Proceed, the Contractor must attain a minimum of 5 task order awards prior to the exercise of Option 1.</p>
		<p>The Government anticipates that there will be 40 awards made under the OASIS IDIQ. Assuming that all 40 contractors are awarded access to all 6 pools (40 x 6 = 240) and if the Contractors attempt to maintain access to all 6 pools prior to exercise of Option 1, then that would mean that the Government would have to release 1,200 RFP/Awards prior to Option 1 (240 x 5 = 1,200). This is problematic for the Contractor as there is no assurance from the Government on the number of task order RFPs that will be solicited and awarded under the OASIS IDIQ.</p>
		RESPONSE: We are editing the language of this section.
494	Section L.5.3.1, page 80	<p>Suggest softening the language in Section H.7.5 to read as follows: "Starting from the date of the OASIS Notice-to-Proceed, the Contractor shall attempt to must attain a minimum of 5 task order awards prior to the exercise of Option I.</p>
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
495	L.5.1.7. Existing Contractor Team Arrangement (CTA), if applicable, page 79	<p>Suggest eliminating the CTA DUNS requirement: "The existing CTA is registered in the Central Contractor Registration (CCR) and has a corresponding DUNS Number." The DUNS requirement is for JVs and not applicable to CTAs.</p>
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
496	L.5.4.2. Past Performance (Proposal Submission, if applicable), pg 82	<p>Suggest the Offeror must submit all Past Performance Rating Forms, as applicable, with their proposal submission.</p>
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
497	L.5.5.11.1. Corporate OASIS SB Program Manager (COPM), pg 86	<p>Suggest change in the COPM requirement from only a Master's Degree in Program/Project Management to a PMP Certified or Master Degree in core discipline related degree.</p> <p>As is "It is encouraged that the COPM have a Master's Degree in Program/Project Management or other discipline relevant to the 6 core disciplines under OASIS SB"</p> <p>Suggested Change. "It is encouraged that the COPM have PMI Certification in Program/Project Management and Master degree in Engineering, Logistics, Finance, Scientific or equivalent disciplines"</p>
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
498	M.5. SCORING SYSTEM, pg 94	<p>Evaluation Scoring Criteria design based on Project size and OCONUS work could potentially eliminate quite a few of SBs, that might otherwise have solid experience and past performance. Also, the requested certifications (EVMS, CMMI, AS9100) are expensive and some of them should be optional evaluation criterias. Suggest that Govt. relook at Relevant Experience of Prime Contractor in Core Disciplines areas. Most SB can not deliver such service to the level and extent requested.</p>
		RESPONSE: Please see previous responses to similar recommendations.
499	Section L.3 INSTRUCTIONS, pg 75	<p>Offerors shall address all questions via e-mail to the OASIS SB CO at oasis@gsa.gov.</p> <p>Suggest Govt. develop website for Offerors to post questions and answers, thereby resulting in Offerors being able to frequently post questions and check answers, prior to submission. Also, enable Govt. to answer questions and refer offerer's to Q&As that have already been asked and/or answered.</p>
		RESPONSE: The question and answer process is a very formal one for the actual solicitation. Very specific instructions will be provided.
500	B.3.5, page 15	<p>Please consider requiring a plug number from the OCO on all task order solicitations since they are reimbursed at actual costs in accordance with the limitations set forth in FAR 31.205-46 and JTR.</p>
		RESPONSE: Please clarify what you mean by "plug" number.
501	G.3.1, page 31	<p>The solicitation, and GSA's previous answer to a bidder's question, does not indicate that there is any cap on the CAF. One way of incentivizing agencies to use the vehicle would be to have a sliding scale for the CAF with a cap. Otherwise, the CAP penalizes larger task orders and may disincentivize agencies from using OASIS. We suggest a CAF percentage and cap no higher than that used for the Alliant vehicle (.75% and \$150,000 cap).</p>
		RESPONSE: Please see previous responses to similar recommendations.
502	L.5.4.3, page 87	<p>Many agency-specific BPAs and IDIQs require contractors to achieve subcontracting goals that are computed at the master contract and not at the Task Order level. For example, one TO could use slightly more or fewer subcontractor dollars than others as long as the average utilization achieves the goals across all TOs under the master contract. We recommend that GSA consider allowing bidders to demonstrate their performance on achieving subcontracting goals across a broader period of time than a single TO used as a relevant experience.</p>
		RESPONSE: We have allowed for that when applicable.
503	M.5, Page 100	<p>Is there any proration of scoring for meeting subcontracting goals? For example, if a past performance meets 95% of the WOSB Goal on a project, would the score be 38 out of 40 (i.e. 95% of the 40 possible points), or would a bidder earn zero points for not meeting the WOSB goal? We suggest that GSA consider prorating the scoring to give credit for progress towards goals.</p>
		RESPONSE: Thank you for the recommendation. We will take it under consideration.

504	M.4.4, Page 98	<p>The OASIS Business Case states that "The purpose of OASIS and OASIS SB is to meet the needs of customers with complex integrated professional service based requirements who cannot use the MAS Schedules, Government-wide Acquisition Contracts (GWACs), or other existing vehicles for a solution."</p> <p>If existing vehicles do not provide the scope and flexibility that OASIS does, it seems overly restrictive to require 5 past performance contracts where bidders have already provided the single-contract integration that OASIS can provide. That is, how can bidders provide past performance references for single integration projects if their clients do not have existing vehicles that support the clients' integrated complex services needs?</p> <p>The OASIS Business Case assumes that agencies are currently knitting together multiple procurements, contracts, and tasks orders to achieve mission or program goals, and that OASIS will provide a one-stop vehicle to eliminate these workarounds. Wouldn't it be equally appropriate for the Past Performances to cite instances where the bidder is supporting (and integrating) the Core Disciplines across multiple contracts or task orders to achieve an agency's requirements for a program? For example, if a bidder currently has one Task Order for CONUS services, one Task Order for the same services OCONUS, and a separate Task Order for Ancillary Services, isn't the bidder providing the type of integrated services that OASIS is supposed to streamline and support?</p> <p>The best examples of work that can be brought/migrated to OASIS are instances where agencies are currently unable to issue single procurements today to achieve their complex integrated professional services needs; by definition, these candidate projects need OASIS. It's ironic that these programs cannot currently be used as past performance references for OASIS if they're not done under a single contract today. Please broaden the Past Performance requirements to allow bidders to cite examples of where they're currently supporting the Core Disciplines across multiple contracts at an agency as this is fundamentally one of the main items which OASIS is supposed to address.</p>
		<p>RESPONSE: While this is a logical recommendation and well presented, we feel that there are sufficient examples of where Contractors have actually performed the "knitting" on single examples. If that does not turn out to be the case, we will amend the solicitation accordingly.</p>
505	H.6.6, H.6.7, and h.6.8, Pages 44 & 45	<p>The certification requirements seem onerous for many small businesses. Corporate certifications are extremely expensive, and time-consuming and are probably difficult for many small businesses to obtain.</p>
		<p>RESPONSE: And yet, we have evidence of many Small Businesses who do have these certifications.</p>
506	H.6.7, Page 44	<p>The AS9100 certification applies only to the aerospace industry, a category which includes only a limited number of small businesses, and yet all other small business are penalized by the scoring matrix. This is unfair to the majority of small businesses.</p>
		<p>RESPONSE: Please see previous responses to similar recommendations.</p>
507		<p>The current requirements for Relevant Experience under OASIS Unrestricted appear to create an eligibility gap excluding those firms from priming who have successfully graduated from "small" status recently. These firms, which represent a huge portion of the marketplace, may be completely qualified and possess exceptional past performance ratings from OASIS-like services, are unlikely to have more than a couple of tasks exceeding the \$5 Million annual average, especially when BPA/IDIQ tasks have to be counted separately. We suggest lowering the minimum requirement to at least \$2.5 Million as well as allowing the use of IDIQ/BPA's as a whole.</p>
		<p>RESPONSE: We are not targeting any particular sub-categories of Offerors. We are looking for the Highest Technically Rated Offerors regardless of what category they consider themselves to be. A unique attribute of OASIS compared to other contracts is that while a Contractor may not meet the requirements or receive an award at the beginning, it is 100% transparent what a Contractor needs to obtain and score in order to be on-ramped later! What other competitive, multiple award IDIQ contract can say that? We will take your recommendations under consideration, but are unlikely to implement them.</p>
508	H.6.5 page 44 and M.5 page 95	<p>Related to the DCMA approved purchasing system. Although not required it is heavily weighted in the Section M scoring table. For the POOL 1 \$14M size should this be an evaluation weight? Per DCMA Instruction 109 dated November 2012 " an initial purchasing system review (conducted) when sales to the Government (excluding competitively awarded firm-fixed-price (FFP), fixed price with economic price adjustment (FP w/EPA), and sales of commercial items covered in FAR Part 12 (Reference (h)) will likely exceed \$25 million in the next 12 months". As such it seems a \$14M company would have no access to get a purchasing approval from DCMA.</p>
		<p>RESPONSE: If no small businesses have an estimating system, then it won't affect any Offerors.</p>
509	L.5.3.1 page 81	<p>Requirement for 1 project to be performed under a Cost Reimbursement Contract type. Although we agree with the desire to have a DCAA approved cost system, the additional requirement for a cost type contract is beyond a company's control and does not add to the DCAA requirement. If a DCAA cost system is the desire, that should be the requirement and a cost type contract is only duplicative of the same desire and more difficult for small companies to meet. We understand from current postings that the cost contract requirement has since been removed of which we agree.</p>
		<p>RESPONSE: Please see previous responses to this recommendation.</p>
510	Section L.5.5.4, Page 83	<p>Most small businesses that have grown their businesses supporting civilian agencies have not had the opportunity to perform cost contract work because of the government's decision to move to more T&M and FFP type contracts to contain contractor cost; therefore having to meet the Adequate Accounting system and Forward Pricing Rate requirements would give preference to DoD-centric small businesses. The government is aware that DCAA will not conduct an audit unless the contractor has secured a cost contract, which precludes the small business from needing to have FPRAs.</p> <p>We respectfully ask that the government remove this requirement as it will not create a level playing field for all small businesses or consider allowing the contractor to submit an independent DCAA pre-award audit conducted by an independent accounting firm as part of the proposal and then have the awardee gain the DCAA Approval within 90 days of award?</p>

		RESPONSE: Please see previous responses to similar recommendations.
511	Section L.5.5.3, Page 83. Also modified in the Changes to the OASIS SB Draft Solicitation posted to GSA Blog on April 19, 2013.	Most small businesses that have grown their businesses supporting civilian agencies have not had the opportunity to perform cost contract work because of the government's decision to move to more T&M and FFP type contracts to contain contractor cost; therefore having to meet the Acceptable Estimating System requirements would give preference to DoD-centric small businesses. The government is aware that DCAA will not conduct an audit unless the contractor has secured a cost contract, which precludes the small business from needing to have an Acceptable Estimating System. We respectfully ask that the government remove this requirement as it will not create a level playing field for all small businesses or consider allowing the contractor to submit an independent DCAA pre-award audit conducted by an independent accounting firm as part of the proposal and then have the awardee gain the DCAA Approval within 90 days of award?
		RESPONSE: Please see previous responses to similar recommendations.
512	Section H.7.5, Page 50	Would the government consider modifying the "must attain a minimum of 3 Task Order Awards prior to the exercise of Option 1." To an evaluation of contract participation in responding to RFPs and attaining task orders. As a new vehicle, the learning curve that is often experienced by agencies on how to use new contract vehicles can significantly impact the number of tasks orders released. Therefore, a better indicator of a contractor's desire to secure work through the vehicle would be best determined by the contractor's level of participation in responding to task orders. Establishing a hard number of 3 task orders does not take this into account.
		RESPONSE: Please see previous responses to similar recommendations.
513	Section L.5.3.1, Page 80. Also modified in the Changes to the OASIS SB Draft Solicitation posted to GSA Blog on April 19, 2013	The government is aware that the \$14M size standard, previously \$7M, is relatively new and therefore most small businesses will not have five prime contracts that are at least \$750,000 per year in value. Under the old NAICS size standard of \$7M many of these companies would have more than likely have graduated out of that NAICS and now be considered mid-size companies. Therefore given that the \$14M size standard is less than 2 years old, imposing this requirement would give preference to those companies that are going to be in the \$12-14M range. Therefore the requirement would eliminate competition for small business that are less than \$12M - To support Small Business, would the government change this requirement to 5 past performances, 3 of which must be prime, with a total contract lifecycle value that exceeds \$750,000 or eliminate the value restriction completely?
		RESPONSE: We will consider the recommendation, but are unlikely to implement it.
514	G.3.11, Page 36	We feel that this section is too restrictive. In the natural economic cycle of business, a successful firm is expected to win business, grow and potentially merge with or be bought by another firm. This clause's intent seems to restrict that growth and eject a successful awardee for successfully growing itself. Typically, small business certifications are only made as of the date the proposal is submitted. We recommend that this clause be deleted from the contract so an awardee can serve out their full 5 + 5 years contract after award.
		RESPONSE: This is required by regulation. Please see FAR 19.301-2.
515	Section H.7.5, Page 50	RFP states : "Starting from the date of the OASIS SB Notice-to-Proceed, the Contractor must attain a minimum of 3 task order awards prior to the exercise of Option I. Failure to attain the minimum number of task order awards prior to the exercise of Option I may result in Dormant Status and/or result in a Contractor being Off-Ramped". OASIS is a brand new GWAC and as such may experience a slow start as our experience show. It will be unfair to penalize contracting companies that will be working hard to help GSA in marketing a new vehicle. Suggestion: this policy should be instituted based on OASIS overall use once it reaches certain level when it will be reasonable to institute the policy like this.
		RESPONSE: The citation says "may", not "shall". Please see previous responses to this matter.
516	L.2.3 Page 73	Draft RFP states "40 contract awards for each Pool." And ties at 40 will also be awarded a contract. Selecting such a large base of contractors adds proposal costs for the contractors and increases GSA selection costs per TO. Recommend you limit the awards to 6-18, like DHS's TABBS and USAF's CAAS IV of similar scopes and magnitudes.
		RESPONSE: Absolutely not. Our experience is that this number of contractors results in decreased levels of competition.
517	M.5. Page 94	Scoring Section L.5.3 (Proposal Volume 3-Relavant Experience) include point values for integrating 4 out of 6, 5 out of 6 and 6 out of 6 Core Disciplines. At the same time only Prime contractor Relevant experience can be used. While we understand the value to the government, this scoring can potentially eliminate SBs that are highly qualified in one or two specific core disciplines. Suggestion: replace with 3 out of 6 or allow to use subs experience.
		RESPONSE: This is an unrestricted contract and special consideration is not being given to any group of Contractors. SB Contractors should consider OASIS SB if they do not feel that they can compete for OASIS awards.
518	L.5.3.1. Page 80	Draft RFP states "Have a total award value of at least \$2M Per Year." Referring to the 5 distinct projects combine to exceed \$2M, not individually having to exceed the \$2M Per Year?
		RESPONSE: Please see previous responses to similar recommendations.
519	M.5. Page 94-95	Draft RFP states on Past Performance "Average rating of "5 - Exceptional" on Federal Government Projects" receives 3K points. Past performance is not an indicator for future and even with all 5's on smaller projects, doesn't compare very well to relevancy value. Please indicate why such a significant emphasizes on Federal and Exceptional for a SB. Even if the relevancy is zero, considered unknown, past performance could be significant at 44% of the scoring value.
		RESPONSE: We do not agree with your opinion that past performance does not indicate future performance. The overwhelming feedback we have received from Industry as well as our clients is that Past Performance is the most important evaluation factor. This shall not change.
520	M.5. Page 95	Scoring Section L.5.5 (Proposal Volume 5- Systems, Certifications, and Resources) include point values for certifications that are not as common for SBs that don't have any DOD contracts and will put companies that primarily support civilian agencies at disadvantage. It includes: CMMI levels 3 and higher, EVMS ANSI, Secret and Top Secret Facility Clearances. Suggestion: eliminate from scoring and see if companies will be willing to commit to some or all of these certifications within one year after the contract award.
		RESPONSE: We will consider this recommendation, but are unlikely to implement it.

521	L.5.5.5 page 83/M.5 page 95	As a small business that extensively uses Federal Supply Schedules the majority of our procurement is considered commercial and is excluded from consideration by the ACO during the determination of need for a CPSR. Use of an approved purchasing system as a discriminator appears to bias the selection toward small businesses that have avoided the use of GSA schedules. We recommend reducing the relative point value of the approved purchasing system to 100 points so this discriminator is of equal importance to other systems and certifications.
		RESPONSE: Please see previous responses to similar recommendations.
522	L.4, Page 77	The instructions for Volume 1 in Section L.4 of the RFP provides a 10 page limit for the Subcontracting Plan. Many companies generally have and use approved, master plans which include a specific individual plan to meet these types of requirements, which may exceed the 10-page limit. We recommend that the government consider eliminating the page limits to account for typical, government-approved plans that may exceed the specified limitation.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
523	L.5.1.6, Page 80	Section L.5.1.6 Subcontracting Plan of the RFP indicates that the offeror shall provide a Subcontracting Plan in accordance with Section J.7, Attachment (7), "Subcontracting Plan Template." Additionally, the offeror must adapt this template to fit their subcontracting situation. Many companies have established and government-approved plans and typically use those plans in proposal responses. May a proposal use an altered format of this template provided that all data requested in the Subcontracting Plan Template is provided? If the format cannot be altered would it be acceptable to include a completed template within the body of the proposal and then attach our master plan, approval letter, and other standard components as proposal attachments?
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
524	L.5.3.1, Page 85	Some IDIQs and BPAs are single award contracts that were created to support large complex programs with progressive work streams and incremental funding streams. IDIQs and BPAs of this nature function to deliver a set of services where the specific requirements are defined and funded incrementally during the performance of the effort, using Task Orders to exercise option years and occasionally add a special project to the overall project. Although work is performed over multiple Task Orders, these Task Orders collectively support a single program similar to the types of complex programs envisioned under OASIS. Will the government accept this type of IDIQ or BPA as a valid past performance?
		RESPONSE: Please see previous responses to similar recommendations.
525	G.2.6.2, Page 30	Paragraph G.2.6.2 states that the Corporate OASIS Contract Manager (COCM) have the authority to contractually commit the company on OASIS and task orders under OASIS. In many companies, especially small and mid-size companies, only the owner can commit, but the ability to negotiate is vested in other functions. We recommend that the government either remove this requirement for COCMs or reword to "Having full authority to negotiate on behalf of their company in all contractual agreements, including any modifications to OASIS, if necessary."
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
526	M.5, Page 100	ODCs, large equipment purchases and other reimbursable such as travel have the ability to greatly inflate a contract's value without reflecting any effort in providing professional services in the Core Disciplines. When determining the average value of a contract we recommend that the government exclude any cost associated with ODCs.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
527	L.5.2, Volume 2 - Responsibility, page 84	Would GSA consider accepting an offeror's most recent publicized annual report in lieu of Form 527? If not how would GSA like to see the information presented? For example, the Form 527 requires the names and number of shares held by "principal stockholders". No where is principal stockholder defined; therefore, the potential exists to list every person that owns a share of stock.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
528	L.5.4.1 Past Performance ratings page 86 and M.5 page 100	Past performance rating are assigned to five criteria and unless all past performance criteria are assigned the same score, a past performance average does not result in a whole number. However, the assignment of past performance score is on the basis of whole numbers such as 4-Very Good and 5-Exceptional. Performance that received four 5s and one 4 would be assigned a score of 4 when the average is 4.8. Would the government consider assigning any Federal Government project past performance reference that received 3 or more ratings of 5 with the remaining ratings 4 the maximum 200 point score for exceptional?
		RESPONSE: Please see previous responses to similar recommendations.
529	L.5.5.11.2, OASIS Contract Manager	Please explain GSA's reasoning for awarding excessive points to a contracts manager that has a certification and a Master's degree. We believe these two factors, especially in the scoring, are over emphasized. There are government contracting officers that would not get the points based on this criteria. While we agree that a seasoned and experienced contracts manager are important, these requirements go above and beyond what is required at the corporate level. Would GSA consider allowing for years of experience for these factors?
		RESPONSE: Please see previous responses to similar recommendations.
530	1. Ref: Section L.5.3.1 (Pa	The past performance requirement for all contracts to total at least two million dollars is extremely restrictive for a small business set-aside. Will the government consider changing that requirement to a one million total?
		RESPONSE: Please see previous responses to similar recommendations.
531	1. Ref: Section L.4 (page	The multiple requirements for certifications is also extremely restrictive to most small businesses, particularly CMMI and ISO 9001:2008 and will block viable small businesses that can perform the work from bidding as a prime. These requirements in many ways are contradictory to the goal of small business set-asides. Small businesses must first earn contract awards under set-asides to grow and mature enough to put more sophisticated practices and procedures in place. The draft as stated will only give larger, more established small businesses OASIS SB awards and those firms will grow out of the small business status quickly making the procurement short lived.
		RESPONSE: There is no requirement for certifications. Please see other related questions/recommendations.

532	H.4.2.1., page 40	Would the Government consider adding additional NAICS codes to include 541512, 541513, 541519, which are computer related services categories? RESPONSE: Absolutely not. Those requirements should be performed under Alliant or a similar IT contract.
533	M.5, page 95; L.5.3, page 80	For small businesses bidding Pool 1, would the Government consider past performances that have a total award value of at least 1 million dollars per year? RESPONSE: Please see previous responses to this recommendation.
534	M.5, page 95; L.5.3, page 80	Small business Pool 1 relevant experience requirements should not be the same as the remaining pools. It should be based on size standards. Typically small business awards are 3-5 million dollars over a period of 3-5 years, which averages to about 1 million a year. RESPONSE: Please see previous responses to this recommendation.
535	Page 45, Section H.6.6. ISO 9001:2008 Certification.	ISO 9001:2008 certification is for quality management systems where, according to the International Organization for Standardization, there is a need for an organization "to demonstrate its ability to consistently provide product that meets customer and applicable statutory and regulatory requirements" and where the organization "aims to enhance customer satisfaction through the effective application of the system, including processes for continual improvement of the system and the assurance of conformity to customer and applicable statutory and regulatory requirements." We see that ISO 9001:2008 certification may be helpful for some types of work that falls under the engineering and logistics disciplines, but it is not applicable to many of the other disciplines. However, per the scoring criteria, this certification is the most important of the three certifications mentioned. Please consider reducing the score value to reflect the nature that such certification will be useful for only a fraction of the projects likely to be sourced from OASIS. RESPONSE: Thank you for the recommendation. We will take it under consideration.
536	Page 45, Section H.6.7. AS9100 Certification.	"Contractors who desire to compete for work within the aerospace industry are encouraged to have AS9100 Certification during the entire term of OASIS." For contractors who will not be competing for aerospace work, the current scoring model, which awards 50 points for having AS9100 certification, will have the effect of giving an advantage to aerospace oriented over non-aerospace oriented firms. Please consider making AS9100 certification simply a prerequisite for any firm wishing to do aerospace work on OASIS and award no points in scoring for having the certification. RESPONSE: Thank you for the recommendation. We will take it under consideration.
537	Page 45, Section H.6.8. CMMI Maturity Level.	It appears that CMMI may be misrepresented in the solicitation. CMMI is described as "a 5 level approach to improve processes across projects, divisions, or an entire organization in the areas of acquisition, services, and development." a. Only CMMI-5 offers evidence of deliberate process improvement. If that is the intent of the Government in adding this requirement, then levels 3 and 4 fail to address the requirement. b. The scoring criteria gives firms with CMMI-3 100 points, CMMI-4 150points, and CMMI-5 200 points. This implies that higher levels of CMMI always are more important than lower levels of CMMI for work to be sourced by OASIS. We suggest that this is not always the case for the OASIS disciplines. c. In the scoring section, CMMI-5 has the same value as a firm that has an average rating of "5 - Exceptional" on Federal Government Projects. Thus, all things considered, a firm with exceptional, relevant Federal performance would rate the same as a firm with no performance at all, but has CMMI-5. We suggest that scoring weights of CMMI are too high and suggest a reduction value, or a removal of this certification from the solicitation altogether. d. There are four CMMI model types: CMMI for Acquisition, CMMI for Development, CMMI for Services, and People CMMI. RESPONSE: Thank you for the recommendation. We will take it under consideration. We do need to point out, however, that the 200 points for CMMI Level 5 is less than just one "5" in Past Performance, which is worth 300 points.
538	Page 100,Section M.5. SCORING SYSTEM	The total point value for small business concern subcontracting in the scoring system is 2,000 points. We suggest that this is too high and thus OASIS appears to be another subcontracting vehicle, rather than a vehicle for large firms with demonstrated capabilities. For example, a vendor with less than Very Good Federal experience, but who can demonstrate significant small business subcontracting in their past performance that exceed the stated subcontracting goals, would outscore a vendor who scored Exceptional on executing the multidisciplinary needs of OASIS. RESPONSE: We have lowered the points in this area.
539	Page 85 Section L.5.3.1 Relevant Experience Minimum Requirements	Minimum requirements appear to require at least one relevant experience to be performed under a cost-reimbursement contract. We have just recently implemented an approved accounting system for cost-reimbursable contracts. Please consider allowing bidders with approved accounting systems to substitute another relevant experience since we have not completed cost-reimbursable contracts at this time. RESPONSE: We have removed that requirement.
540	L.5.3.1; page 80	Would GSA consider reducing the number of projects or the revenue for each project? Having 5 contracts each with annual revenues of \$2m + is a considerable workload for a small business. It is quite likely that many quality companies will not be able to bid due to this requirement. RESPONSE: We have already done this.
541	L.5.3.1; page 81	Would GSA consider eliminating the requirement for a Cost-reimbursement contract? Most small businesses have not worked under these types of contracts. RESPONSE: We already have, but an acceptable accounting system is still a requirement.
542	L.5.5.1; page 82	Our company would welcome an audit from DCAA or DCMA, but have not had one yet. Would GSA consider eliminating this requirement or setting up a post-award audit? In general, contractors are unable to influence when an audit is to be performed. RESPONSE: Please see previous responses to similar questions and changes made in this area.
543	B.2.5.1	Revisit the escalation rate every three years to align with the current approach of using a three-year average of the Bureau of Labor Statistics Economic Cost Index. RESPONSE: Thank you for the recommendation. We will take it under consideration.
544	F.4.1	For each deliverable or report that requires delivery within 3 days, allow a more standard delivery timeframe of 45-60 days.

		RESPONSE: We shall.
545	L.5.3.1	Assign each of the core disciplines a point value and give ancillary support the same point value as any one of the core disciplines, or reduce point value of ancillary services to 50.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
546	L.5.5.1	Change the Adequate Accounting System requirement to allow independent third party assessment with modified language as follows: To be eligible for award, offerors must provide evidence from the Defense Contract Audit Agency (DCAA), the Defense Contract Management Agency (DCMA), any federal civilian audit agency, or a third party accounting firm that their accounting system is designed to achieve the criteria set forth in Federal Acquisition Regulation (FAR) Standard Form 1408.
		RESPONSE: Please see previous responses to similar questions and changes made in this area.
547	L.5.5.3	Change the requirement for an Acceptable Estimating System to allow independent third party assessment with modified language as follows: "To be eligible for award, offerors must provide evidence from the Defense Contract Audit Agency (DCAA), the Defense Contract Management Agency (DCMA), any federal civilian audit agency, or a third party accounting firm that their estimating system is designed to achieve the criteria set forth in Defense Federal Acquisition Regulation (DFAR) DFARS 252.215-7002."
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
548	L.5.5.4	Change the requirement as follows: "To be eligible for award, offerors must provide the relevant Forward Pricing Rate Proposals (FPRP) which has been submitted to DCAA and that is applicable for the time period of award."
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
549	L.5.5.8	Give the same number of points (200) to organizations that have achieved CMMI Level 4 or 5.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
550	L.5.5.11.1	Combine the education/certification scoring elements for the COPM and establish a single point value (50) for education and/or certifications.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
551	L.5.5.11.2	Combine the education/certification scoring elements for COCM and establish a single point value (50) for education and/or certifications.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
552	M.3	Add a concise statement on the Pass/Fail criteria.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
553	M.3	Include a brief explanation of the relationship between Core Disciplines, the associated Pool Structure, and its applicability to the unrestricted contract.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
554	G.3.7. Mergers, Acquisitions, Novations, and Change-of-Name Agreements	· Copy of SF 30 and other applicable documents within 45-60 calendar days of finalization
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
555	H.6.1. Adequate Accounting	· Within 45-60 calendar days after the update
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
556	H.6.2. Acceptable	· Within 45-60 calendar days after the update
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
557	H.6.3. Cost Accounting Standards (CAS)	· Within 45-60 calendar days after the update
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
558	H.6.4. Forward Pricing Rate	· Within 45-60 calendar days after the update
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
559	H.6.5. Approved Purchasing System	· Within 45-60 calendar days after the update
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
560	H.6.6. ISO 9001:2008 Certification	· Within 45-60 calendar days after the update
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
561	AS9100 Certification	· Within 45-60 calendar days after the update
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
562	CMMI Maturity Level	· Within 45-60 calendar days after the update
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
563	EVMS ANSI-standard	· Within 45-60 calendar days after the update
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
564	Facility Security Clearance	· Within 45-60 calendar days after the update
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
565	G.2.6.1 (Page 30), J.4 ATTACHMENT (4) (Page 3), L.5.5.11.1 (Page 91-92) & Section M.5 Scoring System (Page 101)	For the Corporate OASIS Program Manager(COPM), it is important that key personnel have experience with managing both complex integrated professional services and multiple award IDIQ contracts. We believe these are two separate evaluation criteria, both of which are significant for OASIS. A minimum requirement of 5 years experience with integrating teams on programs similar in size, scope, and complexity to professional service type requirements within the scope of OASIS is appropriate, with 8 years (25 points) and 12 years (50 points) as the scoring factors. These experience levels have been revised to better reflect the actual levels of experience expected from the offerors and will benefit the GSA by providing better granularity and spread of scoring among the offerors. As a separate factor, we recommend including 2 years minimum MA-IDIQ experience, with 3 years (25 points) and 5 years (50 points) as the scoring factors. Finally, OASIS has the potential to support classified work. We recommend secret (25 points) and top secret (50 points) clearance for COPM be added as scorable factors. In total, we believe these factors provide better granularity for scoring COPM candidates across a full spectrum of bidders and ultimately provide COPMs who will help the GSA and a broad base of customers fully
		RESPONSE: Thank you for the recommendation. We will take it under consideration.

566	G.2.6.1 (Page 30), J.4 ATTACHMENT (4) (Page 3), L.5.5.11.1 (Page 91-92) & Section M.5 Scoring System (Page 101)	For the Corporate OASIS Contract Manager(COCM), it is important that key personnel have experience with managing both complex integrated professional services and multiple award IDIQ contracts. We believe these are two separate evaluation criteria, both of which are significant for OASIS. A minimum requirement of 5 years experience with integrating teams on programs similar in size, scope, and complexity to professional service type requirements within the scope of OASIS is appropriate, with 8 years (25 points) and 12 years (50 points) as the scoring factors. These experience levels have been revised to better reflect the actual levels of experience expected from the offerors and will benefit the GSA by providing better granularity and spread of scoring among the offerors. As a separate factor, we recommend including 2 years minimum MA-IDIQ experience, with 3 years (25 points) and 5 years (50 points) as the scoring factors. Finally, OASIS has the potential to support classified work. We recommend secret (25 points) and top secret (50 points) clearance for COCM be added as scorable factors. In total, we believe these factors provide better granularity for scoring COCM candidates across a full spectrum of bidders and ultimately provide COCMs who will help the GSA and a broad base of customers fully RESPONSE: Thank you for the recommendation. We will take it under consideration.
567	L.5.4.3 (Page 88)	DoD can be expected to be a major user of OASIS. Recommend GSA recognize a DoD Comprehensive Small Business Subcontracting Plan, as well as ISRs and SSRs. DoD programs can use a Comprehensive Small Business Subcontracting Plan for Small Business goals and reporting. Not accounting for this in scoring would penalize some bidders who work with DoD customers. The DoD Comprehensive Small Business Subcontracting Plan is prepared pursuant to Section 834, P.L. 101-189, Section 811, P.L. 104-106, Section 822, P.L. 105-85, Section 817, P.L. 106-65 and the regulations issued by the federal agencies to implement the requirements of these laws, including DFAR 219.702. RESPONSE: Thank you for the recommendation. We will take it under consideration.
568	L.5.3.2.2, M.5, J.5 Attachment (5) (Pages 85-86)	The relevant experience template requires the offeror to submit a program's Annual Dollar Value, Total Award Value, and Total Period of Performance. While each of these factors is important in assessing a program's scale and complexity, only Annual Dollar Value is used for points scoring. GSA should consider awarding additional points for durations longer than 5 years and 10 years, and should also consider awarding points on total program value (\$100M, \$500M, and \$1B). RESPONSE: Thank you for the recommendation. We will take it under consideration.
569	M.5 Scoring System - Volume 4(Pages 100-101)	All else being equal, a \$20M/year program that meets 5 of 5 socioeconomic categories will score higher than a \$200M/year program that meets 4 of 5 categories. To best reflect the capabilities required to execute top-tier, complex programs, GSA should consider awarding additional points for programs over \$100M/year and \$200m/year. RESPONSE: Thank you for the recommendation. We will take it under consideration.
570	M.5 Scoring System - Volume 4(Pages 100-101)	Many federal agencies have goals to increase their usage of cost reimbursable contracts. While this requirement has been removed as a minimum criteria for past performance, GSA should consider awarding additional points to contractors that can demonstrate performance on large scale cost reimbursable contracts. We recommend an additional 100 points for each cost reimbursable contract, up to a maximum of two total contracts (similar to the current OCONUS scoring). RESPONSE: Thank you for the recommendation. We will take it under consideration.
571	M.5 Scoring System - Volume 4(Pages 100-101)	For clear differentiation between offerors in the Multi-site scoring category, GSA should consider a awarding points on a geographic scale continuum. We suggest that a Single site / Single Metropolitan area receives 0 points, Multi-site (2-5 locations) receives 25 points, Regional presences (6-10 locations) receives 50 points, and Nationwide presence (>10 locations) receives the full 75 points. RESPONSE: Thank you for the recommendation. We will take it under consideration.
572	Section M, M.4.4.1 Past Performance, "Offerors are strongly cautioned that inability of the government to contact references, verify information or receive responses to surveys may result in ineligibility for award". (Pages 98-99)	While offerors typically make every effort in advance to inform a reference of the importance of responding to past performance surveys, the offeror really has no control over whether it actual happens or not. Suggest the GSA delete this language. If one or more past performance customers do not respond, the offeror would be penalized by not receiving scoring points for these contracts. RESPONSE: We cannot provide credit for past performance that we cannot verify.
573	L.5.4 (Pages 86-87)	In the current scoring system, 68% of the overall points are allocated to experience and performance on 5 programs. To best differentiate top offerors, we recommend requiring 10 past performance citations and adjust scoring values accordingly. Adding more past performance examples to the scoring system will further differentiate contractors, ensuring that the OASIS contractor family will consistently demonstrate high levels of performance across a broad number of federal agencies. RESPONSE: Thank you for the recommendation. We will take it under consideration.
574	L.5.5. (Pages 87-92)	Because DoD is expected to be a significant customer for OASIS, we recommend addition of a comprehensive DoD Small Business Subcontracting Plan (200 points) as a certifications scoring factor for Volume 5. This program authorizes the use of a companywide, comprehensive plan, instead of individual subcontracting plans for each contract. RESPONSE: Thank you for the recommendation. We will take it under consideration.
575	L5.3 Relevant Experience Page 80	Recommend award consideration be made for an emerging small business with significant relevant experience in most/all OSASIS core disciplines with individual staff members versus as a corporation. RESPONSE: We cannot establish consideration for categories of business that are not authorized by the FAR.
576	B.1.5 Contract Access Fee Page 11	Recommend establishing the fee and entering in the final RFP--Customers always ask what it will cost to use the contract and publishing it early on will help in early marketing campaigns. RESPONSE: The CAF shall be clearly articulated in the final solicitations.

577	L.5.1.5 Uncompensated Overtime Policy Page 80	This paragraph establishes a requirement that is evaluated for a company's Uncompensated Overtime Policy. Company's are not required to implement an Uncompensated Overtime Policy, and may not have an Uncompensated Overtime Policy. Recommend this requirement be eliminated, or changed to read that if a company has an Uncompensated Overtime Policy, submit it. Also, remove it from one of the documents used to determine pass or fail.
		RESPONSE: This is a regulatory requirement.
578	L.5.1.6 Subcontracting Plan Page 81	This section requires that companies express its total estimated subcontracting dollars planned in its subcontracting plan. This seems to be an unreasonable requirement from the perspective that OASIS is a GWAC IDIQ, and the total value each awardee may realize from this contract is unknown. Recommend this requirement be changed to show what percent of total subcontracting dollars will be established as a goal for each small business socio economic category.
		RESPONSE: We agree with you in principal, but it is not within our discretion to delete the dollar amounts. Offerors should make their best estimate as to the dollar values and those can be adjusted as time goes on.
579	L.5.3.1 Relevant Experience Minimum Requirements Page 85	Sub paragraph 3. requires each contract to have an annual value of at least \$5 Million. Must the contract achieve 5 Million each year, or at least 5 Million for one year of the POP? There are IDIQ contracts that fluctuate from year to year, and may be worth less than \$5 Million on a given year. We recomend the requirement be clarified to read , "achieve at least \$5 Million for one year of the POP."
		RESPONSE: The requirement is for \$5M/year.
580		1. Previous recommendations #77 and #182 raise concerns with the certifications and systems lists in Volume 5. As noted, many government agencies do not require or request the audits or certifications listed in Volume 5 of the scoring system (L.5.5.3-L.5.5.9). We agree with GSA that the systems and certifications are very important to certain agencies. However, the weighting seems out of balance for those agencies whose procurement processes do not require these certifications. We suggest an approach that would not overly penalize contractors serving these agencies. This would help ensure that these agencies have access to the broadest possible range of competitive options. One option to consider would be to include these certifications and systems (L.5.5.3-L.5.5.9) at the task order level when required by individual agencies.
		RESPONSE: By limiting these things to the task order level, you potentially shrink competitive pools dramatically. We will keep them at the contract level. If companies do not have these things now, and obtaining them would make them eligible for award, then those companies could go seek those certifications and compete for an on-ramp in the future.
581		2. As noted in recommendation #127, many civilian departments and smaller agencies do not routinely require verification of EVMS. We agree with recommendation #127 and strongly encourage GSA to modify their evaluation criteria to include points for companies that are compliant with ANSI/EIA Standard-748 but do not have an audited EVMS system.
		RESPONSE: How do we verify that you are compliant without an audit?
582		3. Regarding scoring for the COCM NCMA certification (L.5.5.11.2), we would ask GSA to consider that a current contracts- or procurement-related certification from an accredited institution or a relevant business certification be accepted in addition to NCMA certifications.
		RESPONSE: We are doing this.
583	L.5.3.1 page 85, M.5 page 100	Page 85 indicates project must involve 4 of the 6 core disciplines to be relevant. The scoring system should include points for project that meet the 4 of 6 standard. As it stands now points are only awarded for project that involve 5 or 6 of the core disciplines.
		RESPONSE: Please see the previous responses regarding scoring for minimum requirements.
584	L.5.3.1 page 85, M.5 page 100	Page 85 indicates project must have total award value of 5 million per year. The scoring system should include points for projects that meet the 5 million/year standard. As it stands now points are only awarded for projects that exceed 10, 20 and 50 Million
		RESPONSE: Please see the previous responses regarding scoring for minimum requirements.
585	L.5.3.1 page 85, M.5 page 100	Page 85 indicates projects must have total award value of 5 million per year. Requiring revelant projects to meet a dollar value <u>per year</u> unduly restricts revelant project from being used. Many projects are multi-year. We strongly suggest making the requirement project value based not contract value per year based.
		RESPONSE: We will consider your recommendation, but are unlikely to implement it.
586	L.5.5.3 and Section J.4., Attachment (4)	Section L.5.5. Volume 5 - Systems, Certifications, and Resources only requires an adequate accounting system to be eligible for award (L.5.5.1). Section L.5.5.3 states that If available, the Offeror must provide verification of an acceptable estimating system. The checklist (Section J.4., Attachment (4)), however, states under Section L.5.5 for Question 1 in the note that "If NO regarding questions 1 and 2 in this section, your offer is ineligible for award)." Since most small businesses do not have an approved estimating system, the checklist section J.4., Attachment (4) should be amended to reflect what is in Section L.5.5.3.
		RESPONSE: This was a typo. Please see previous responses to this question.
587	H.6.8 (page 45)	In the spirit of rewarding companies for professional certifications and appraisals attainments, would it not be in the best interest of OASIS to reward points for CMMI Levels one (1) and two (2)? Small businesses that have started the CMMI appraisal progression should be rewarded for those efforts versus companies that have not.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.

588	L.5.3.1	With respect to "relevant experience" the Draft RFP identifies that project have to have been completed within the last 5 years. The OASIS SB contract is intended to have a maximum ten year period of performance (15 years, if lingering task orders are included in the calculation). The period of performance is similar to other GSA GWAC-type contracts (FAST, HUBZone, Millennia, Millennia Lite, ANSWER, Alliant, Alliant SB, VETS, STARS, STARS II). Anecdotally, we have found that the majority of task orders released on GSA GWAC-type contract occurs between years two (2) and eight (8) of the contract. It appears by the Draft RFP, given GSA's desire to focus strictly on an offeror's performance as opposed to a team, that success on a GWAC-type contract is desired, yet by limiting the time frame for relevant experience, there is a strict limitation on the measuring an offerors success on alternate GWAC-type contracts because earlier awarded task orders would not be included for consideration? Would GSA consider lengthening the relevant period to ten years to show broader success of task orders on alternate GWAC-type contracts?
		RESPONSE: While we understand the logic behind your suggestion, there is no OASIS previous contract or OASIS-like contract to pull experience examples from. Additionally, completed within the past 5 years could theoretically mean awarded as much as 10 years ago.
589	L.5.3.1 (page 80)	With respect to "relevant experience" the Draft RFP requires that the five project references each have a total award value of at least \$750 thousand per year. Considering the section also requires project references to have occurred within the last 5 years and taking into account the rule for calculating small business size by taking the average gross revenues for a vendor's prior 3 fiscal years, it would seem that many small businesses, given the types of quality offerors that GSA is soliciting, may exceed the size standard for Pool 1 early in the performance of OASIS SB. Though it is understood that on-ramping is possible, it is worth considering that the dollar threshold for the project references be reduced to maximize the opportunity for OASIS SB awardees (specifically in Pool 1).
		RESPONSE: We don't agree with your assessment that many SBs would exceed the Pool 1 size standard. Even if all 5 references had occurred within the past 3 years, at \$750K each, that is still only \$3.75M. The size standard for Pool 1 is \$14M.
590	Section J.4., Page 1	Recommend requirements regarding Section L.5.2. #2 be revised to recognize offerors who keep up-to-date Representations and Certifications utilizing the Online Representations and Certifications Application (ORCA).
		RESPONSE: Please see previous responses related to this recommendation.
591	Section J.4., Page 1	Recommend requirements regarding Section L.5.3. #1 be revised to enable businesses to meet requirements for either a portion of or a minimum number of the five (5) projects. Many businesses, especially small businesses, do not focus on all specified requirements for every project.
		RESPONSE: Please see previous responses related to this recommendation.
592	Section J.4., Page 2	As a standard practice many non-Governmental (commercial) entities do not, and will not, complete the rating forms referred to in Section L.5.4. #1. Therefore, it is recommended a work narrative be a permissible substitution for such entities.
		RESPONSE: We will not provide credit for past performance if we cannot validate it.
593	Section J.4., Page 2	Recommend requirements regarding Section L.5.5. #1 and #2 be revised to permit independently audited financial statements in lieu of verification provided by Defense Contract Audit Agency (DCAA), Defense Contract Management Agency (DCMA), or a Federal Civilian Audit Agency. Unless a business has worked for program requiring a DCAA audit or pre-award audit, it would not have been subject to this requirement thus rendering the business unable to request audit statements from DCAA or DCMA.
		RESPONSE: Please see changes and previous responses related to this recommendation.
594	Section J.4., Page 3	Recommend requirements regarding Section L.5.5. #12 be revised to permit either one of the listed PMI certifications or five (5) minimum years of work experience. The number of certifications offered combined with the number of applicants for each makes it unrealistic to acquire all certifications offered every few years.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
595	Section J.4., Page 3	Recommend requirements regarding Section L.5.5. #15 be revised to permit either a Certified Public Accountant (CPA) certification or one of the listed National Contract Management Association (NCMA) certifications or five (5) minimum years of work experience.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
596	Section J.4., Page 4	Recommend requirements regarding Section L.5.3 #2 be revised to reduce the project total annual award value minimum to \$1M. Small businesses are not realistically awarded projects with total annual award values exceeding \$2M.
		RESPONSE: Please see changes and previous responses related to this recommendation.
597	Section H.7.5., Page 50	Due to current economic conditions, which has seen severe reduction of contracts and funds, recommend this requirement be adjusted to only one (1) task order award from the start of the OASIS SB Notice-to-Proceed and three (3) task order awards by the end of Option I.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
598	Section L.5.3.1., Page 80	Recommend the total award value be reduced to \$500,000. As a small business supporting the Government for more than 20 years, we have never been awarded a \$2M project on an annual basis. Additionally, due to the cost cutting and the reduction of contractor support and contract dollars related to the current economic climate, an award of that size is highly unlikely as we look into the near future.
		RESPONSE: Please see changes and previous responses related to this recommendation.
599	Section L.5.5.1.-5., Page 83	Recommend this be adjusted to permit independently audited financial statements. Unless a business has worked for program requiring a DCAA audit or pre-award audit, it would not have been subject to this requirement thus rendering the business unable to request audit statements from DCAA or DCMA.
		RESPONSE: Please see changes and previous responses related to this recommendation.

600	Section L.5.3.1, page 80.	<p>As a fully qualified and reputable Small Business, the requirement to provide 5 relevant prime project experiences valued at least \$750K per year appears fair and manageable from a dollar threshold, but is somewhat restrictive from a Prime contract perspective. To allow fully qualified straight Small Business concerns without any socio economic designation to fairly compete on OASIS, especially with recent AQ strategies concentrating specifically on Socio Economic SB prime opportunities, many small business have had to subcontract over the 3 years. There have been very few prime SB opportunities that have presented themselves over that period. 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.</p>
<p>RESPONSE: Thank you for the recommendation. We will take it under consideration.</p>		
601	M.5 p.100; Section J.5, p.1	<p>M.5 P.100 VOLUME 4 – RELEVANT EXPERIENCE awards 100 points for each Relevant Experience project in which work was “performed in multiple locations.” However, Section J.5, RELEVANT EXPERIENCE TEMPLATE p.1 under PLACE OF PERFORMANCE, asks for work that was performed in “Multiple CONUS Locations.” We believe this latter phrasing does not adequately capture the experience of offerors who have implemented U.S. Government contracts in multiple locations outside of the continental U.S. As currently written, the scoring criteria award more points to an offeror who has implemented work in Washington, D.C. and Virginia than to an offeror who has implemented work in Baghdad and Erbil in Iraq, although the does represent a complex implementation effort. We therefore recommend that GSA interpret this criteria along the wording in M.5 to allow work performed also in multiple locations in the country of primary implementation as well as for multi-country projects.</p>
<p>RESPONSE: Thank you for the recommendation. We will take it under consideration.</p>		
602	M.5 p.100	<p>L.5.4 VOLUME 4 – PAST PERFORMANCE awards up to 1500 points to offerors for meeting and exceeding subcontracting goals for each small business type as well as total small business subcontracting. This was further clarified in Question and Answer 144 in the Clarifications document published on April 19, 2013 as follows: “Section L.5.4.3, Page 87 and Section M.5 Scoring System, Page 100 . Under L.5.4.3, why are Offerors losing potential points if the projects do not have the specific small business goals listed? Offerors can lose up to 2,000 of the 3,000 points available for Volume 4 if the projects do not have small business goals. The Federal Government determines whether there are small business goals, and the goals are not the Offeror’s choice. Should Offerors be penalized because the Government has chosen not to have small business goals in our relevant projects? RESPONSE: The points have been edited, but the intent of the question is being considered. We wanted to award companies who had actually lived up to small business subcontracting goals. All federal projects above \$650,000 should require a subcontracting plan. Technically speaking, the Government does not set goals, only encourages them.”</p>
		<p>FAR 19.702 (b)(3) states “Subcontracting plans...are not required - For contracts or contract modifications that will be performed entirely outside the United States and its outlying areas.” As a result, contractors that implement US Government programs outside the United States often do not have Subcontracting Goals. This would seem to unfairly advantage contractors who work with USG Agencies domestically vs. those that work with USG Agencies on international programs.</p> <p>Additionally, we are concerned that only awarding points for meeting or not meeting subcontracting goals advantages those contractors that propose minimal, and easily achieved goals, while disadvantaging those contractors that have set higher and more challenging goals. For example, under the current scenario, a contract with a 1% subcontracting goal for small businesses that was met would receive full points, whereas a contract with a 20% goal, that achieved 19% subcontracting with small businesses would receive no points in this category.</p> <p>We therefore respectfully request that GSA consider a point system based on actual utilization of Small Business Subcontractors, and that small business subcontracting points be awarded for only 3 of the 5 contracts, so that contractors implementing programs that do not have small business subcontracting opportunities (such as international programs) not be unduly disadvantaged.</p>
<p>RESPONSE: Thank you for the recommendation. We will take it under consideration.</p>		
603	M.3 pp. 95-96	<p>Section M.3. SCREENING AND EVALUATION PROCESS describes the process whereby offerors will be scored, and then according to their scores, ranked within the pools that they have selected into. We understand from discussions informational sessions that this would be expected to result in something like 40+ awards (since many top scored offerors would be expected to choose multiple pools). A review of the point structure shows that points are awarded for many items that are typically associated with only the very large US Government military/defense/aerospace contractors. These includes points associated with ISO certifications, in one case an aerospace certification, and approved systems. Additional points are awarded for progressively larger past performance examples, placing value on the sheer size of contracts over other factors.</p>
		<p>Many USG agencies rely on smaller contractors that provide integrated services, exactly those described in the 6 core disciplines, but on a smaller scale. By definition therefore, the contractors that provide the most services to the smaller agencies would be automatically penalized because their experience examples will not be as large as those enjoyed in the Defense sector. Particularly in pool 1 which includes a broad range of services, smaller agencies would find themselves essentially shut out from being able to access the services available under OASIS, because the pool of awardees, as currently envisioned, could easily be limited to Defense contractors only.</p>
		<p>We respectfully request that GSA consider expanding the awards in Pool 1 to 80 or more awards or divide OASIS into DOD and non-DOD vehicles in order to allow for a broader array of contractors who could be more responsive to a variety of agencies. This could particularly help to meet the needs of smaller agencies, and to ensure competition for the tasks those agencies would seek to order.</p>

		RESPONSE: The scoring system is designed to permit an array of contractors on the contracts. The most heavily weighted factor is Past Performance, which has no relation to dollar value whatsoever. Our belief is that 80 awardees may be overbearing for OCOs. We will start at 40 and add more contractors if need be based on competition levels.
604	L.5.3.1 Relevant Experience Minimum Requirements	The past performance and contract value requirements will make it virtually impossible for many qualified very small businesses to bid on OASIS SB. Perhaps this is by design but we respectfully request that you reconsider these requirements or allow the inclusion of teams in the mix.
		RESPONSE: We feel that we have to hold the bar at some reasonable standard where we feel we will have sufficient competition or we are doing a disservice to the small business community. Let's think about this. If there are 40 or more SB contractors competing who <u>can</u> meet the current past performance and contract value requirements, and we lower the standards so that everyone can submit a proposal, will that likely change the resultant group of winners? We think likely not. So all we would have accomplished would be to allow a lot of small business to waste their hard earned money putting a proposal together for something they wouldn't likely be competitive for. Would anyone consider that a good thing? We don't. Accordingly, we've made some changes in consideration of Pool 1 and 2, but don't want to set the bar too low. The positive side for Contractors interested in OASIS, but not quite there right now, is that we actually will be able to do on-ramps in the future and potential Offerors know the minimum they have to score in order to be considered.
605	L.5.3.1 Relevant Experience Minimum Requirements	We recommend the following: 1) lower the thresh hold of the contracts to \$500K for past performance of the prime; 2) allow the small business to use the past performance of the prime; 3) allow a small business to use a teammates past performance for 2 of the 3 pp, i.e. allow small businesses to cover the requirements with teammates for two of the five past performances with prime past performance over \$1M. Why? Because it will be hardship for a small business to have integrated past performances at the \$750K level.
		RESPONSE: Please see previous responses to similar recommendations.
606	5. Pg 26, Para F.4.2 Compliances, H.16.14. – Limitations on Subcontracting	The requirement for "50% of the cost of task order performance " conflicts with FAR 52-219-14 which states that "At least 50 percent of the cost of contract performance incurred for personnel shall be expended for employees of the concern". Please revise this to reflect performance across the life of the contract
		RESPONSE: Please see previous responses to this or similar recommendations.
607	9. Pg 45, Para H.6.8	CMMI Level 3 certification is higher than the vast majority of small business can achieve or need. Please consider lowering this to CMMI Level 2.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
608	10. Pg 50, Para H.7.5	Since winning or losing is a subjective outcome, the requirement to attain a minimum of 3 task order awards is very onerous. We recommend changing this to read a requirement to respond to at least 3 task order versus attaining award.
		RESPONSE: Please see previous responses related to this recommendation.
609	11. PG 79, Para L.5.1.7	Please explain the Government rationale for placing the restrictions on Contractor Teaming Agreements? The requirement for allowing ONLY established CTA's subverts the very nature of the FAR. CTA were and are designed to create opportunity not restrict it. This is very counter productive for Small Business. We request this restriction be removed from the Final solicitation.
		RESPONSE: Please see previous responses related to this recommendation.
610	H.11, page 53	Recommend a solution that rewards success through automatic elevation from lower to higher Pools as primes exceed employee or dollar SB thresholds.
		RESPONSE: Please see the on-ramping procedures at Section H.11.
611	G.3.1, Page 30	Recommend a CAF "cap" as currently offered through GSA Alliant.
		RESPONSE: Please see previous responses related to this recommendation.
612	M.2, page 89	Recommend a focus on "best value" as opposed to the popular "low cost/technically acceptable" because OASIS is a more robust contract, offering higher levels of quality and certification and should emphasize that best value is often also lowest overall cost when productivity is weighed against price.
		RESPONSE: OASIS has no "focus" on low priced technically acceptable. Please see Section M.2.
613	Section F.4.1, Pages 24-26, Performance Standards	Would the Government please consider revising the frequency of calendar days to business days in order to ensure consistent management of deliverables?
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
614	Section F.4.1, Pages 24-26, Performance Standards	In consideration of the referenced item that currently reads: "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." Would the government please revise to qualify that failure to meet the above mentioned deliverables on a consistent basis may/will result in a notice to cure, and that failure to resolve noticed issues may then result in a dormant status and/or result in a contractor being Off-ramped? Such clarity on the course of escalation in action taken against dormant/inactive primes will establish a set course to resolve dormancy issues or arrive at a clear off-ramping decision.
		RESPONSE: The introduction to the Section governing Dormancy Status already does this, but we will examine the language.
615	Section G.2.6, Pages 28-30, Contractor Key Personnel.	We request that the government remove the reference for a "minimum term requirement of one (1) calendar year" for the COPM/COCM, as any substitute for these positions will have qualifications equal to or superior to the predecessor.
		RESPONSE: We do not want or expect lots of turnover in OASIS Key Personnel, so we are unlikely to accept this recommendation.
616	Section G.2.6, Pages 28-30, Contractor Key Personnel.	We request the OASIS CO notify the contractor of approval/ disapproval no later than 15 calendar days.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
617	Section G.3.1, Page 30, Contract Access Fee (CAF).	We request bi-lateral modification for any associated CAF changes.

		RESPONSE: That is an administrative function and not subject to bilateral agreement. CAF is not charged to Contractors.
618	Section G.3.1, Page 30, Contract Access Fee (CAF).	Would the government please replace the term "year" with "calendar year" in the context of this clause?
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
619	Section G.3.1, Page 30, Contract Access Fee (CAF).	Would the government please consider language that would require the CAF to be a separate CLIN, as to promote consistency across all Vendor future task order bids received?
		RESPONSE: We are considering this right now and are likely to implement it.
620	Section G.3.1, Page 30, Contract Access Fee (CAF).	We request that "reasonable notice" be stricken and be replaced with a defined period (e.g. 30 calendar days).
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
621	Section G.3.2.1, Pages 30-31. Task Order Award Data.	Would the government please revise the clause in Item 4 to read Government-Site, Contractor-Site or both.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
622	Section G.3.8, Page 35, Responsibility and FAPIIS.	Please replace all reference to CCR with System for Award Management (SAM) as CCR is now obsolete.
		RESPONSE: We shall.
623	Section H.6.2, Acceptable Estimating System; H.6.5 Approved Purchasing System, Pages 43-44; L.5.5.3- L.5.5., Pages 88-89; M.5, page 101	In discussions with DCMA and DCAA personnel, such individuals advised that given limited resources and the number of companies, audits and reviews relative to Estimating Systems and Purchasing Systems involve a waiting period of one and a half years. Further, as the Government knows and understands, such audits and reviews may only be performed by such agencies. Under such circumstances, we recommend that such factors be eliminated for purposes of OASIS evaluation and, instead, allow and evaluate a detailed description of internal processes and procedures in lieu of Audit Report Documents/Letter Verification. Moreover, in reference to the small regional DCMA Purchasing System audit teams, there is no travel until at least the end of the fiscal year 2013, thus further restricting DCMA's ability to perform such audits. To give points to companies that have pre-existing estimating and/or purchasing system reviews in place is to create an unfair playing field given the inability of companies without such reviews to obtain them even when merited and desired by Government buyers and these relevant agencies.
		RESPONSE: Please see changes and previous responses related to this recommendation.
624	Section K.1, Pages 64 - 72	Would the government please replace references to ORCA or CCR with System for Award Management (SAM)?
		RESPONSE: We shall.
625	Section L.5.3.1.1, Page 80, VOLUME 3-Relevant Experience	Since the scope of this contract encompasses a variety of services, and the contractor needs to show experience handling multiple integrated requirements through a single task order, would the Government please consider changing the requirement to: "The scope of work must include at least three (3) of the Six (6) OASIS Core Disciplines," rather than require that the primary scope of work must be one of the six OASIS Core Disciplines? This is particularly appropriate given that, in the absence of OASIS, Government buyers may have de-emphasized or not reflected the OASIS areas in the scope of the work in a manner that would be possible under OASIS. Furthermore, demonstration of integration of integration experience across core OASIS domains rather than a subjective perspective on what is the "primary" scope area would more closely align to the Government's expressed goals in relation to OASIS.
		RESPONSE: Any relevant experience example needs to be a requirement that could have been performed under OASIS.
626	N/A	Q&As - Clarifications - Q&A #104, L.5.3.1 – Would the Government please confirm that this will be modified to reflect "exactly five projects whose total average value is at least \$5 Million each", rather than \$5 Million Per year. We recommend this approach stated by the Government in response to this Q&A, i.e., the requirement value of each of the relevant project experiences must have total value of \$5M. If the Government does not confirm this approach, we recommend reducing the average value to at least \$3M per year for each project so as to provide a more inclusive strategy of mid-tier professional services companies and so as to more closely align to the average task order for services covered by the OASIS contracts.
		RESPONSE: The requirement is for \$5M/year. But thank you for the recommendation. We will take it under consideration.
627	N/A	The clause currently reads " For each project that is identified as a contract, that is ongoing with at least One (1) year of performance completed prior to the solicitation closing date, Offerors must submit the ISR ending March 31st or September 30th, whichever is the preceding reporting period related to the contract." Please consider including language that applies exception such as for instances where the Prime was not required to report or was Small at the time of contract performance. In response to Clarification Q&A #103, it appears that the Government has taken this approach, i.e., "If the project was performed as a small business, the ISR or SSR would not apply." Please confirm how this will impact the scoring system; in other words, such companies would receive no points even if competing under the OASIS Unrestricted Pools and, accordingly, would not be on a level playing field? We recommend that the Government use the Subcontracting Plan submitted rather than the ISR reports in order to treat equally all offerors on the OASIS Unrestricted contract.
		RESPONSE: We cannot create what each prospective Offeror considers a "level playing field" for all situations and all Contractors. This is an unrestricted, full and open contract. There are no considerations for any competitors regardless of current status or former status as a small business. As we have maintained from the start of this process, we are more concerned with proven results than promises of future performance.

628	Section L.5.3, VOLUME 3- Relevant Experience; Pages 80-81; Section M, GWAC/IDIQ Corporate Experience, Scoring System, Pages 89-96	Given the emphasis on and importance of OASIS awardees being willing and able to respond to multiple task orders, as well as manage multiple task orders successfully, we recommend that participation and success on at least one (1) Multi-Award Contract (MAC) be made part of the required Relevant Experience and Evaluation Process and generate points under the Scoring System. Such capability by awardees is critical to the success of OASIS. Currently, single large award task orders are given significant weight and may be inconsistent with the promotion of competition on OASIS as the Government has stated is "fundamental" (Q&As, General, Q&A 5). Evidence of capabilities and success on such MACs is a critical element for success on OASIS. Number of awards won under MACs may be afforded Evaluation Points as follows: 2 MACs - 50 Point Value; 3+ MACs - 100 Point Value; Successful number of MAC Task Orders: 5-10 = 100 Point Value; 11+ MAC Task Orders - 200 Point Value.
RESPONSE: Thank you for the recommendation. We will take it under consideration.		
629	Section M.5, Page 94, Scoring System	Given the degree and complexity of a broad range of services, would the Government please consider adding an additional line for Section L.5.3.1, Element as quoted "Projects integrating 4 out of 6 Core Disciplines" with a point value of 50? Existing valuations would be as follows: projects integrating 5 out of 6 valued at up to 75 and Projects integrating 6 out of 6 valued at 100. In this way, OASIS PMO, is providing a means to reasonably consider those past performances for contractors awarded work that may not have had an OASIS like acquisition vehicle allowing an agency to consolidate fully integrated services due to acquisition conflicts. This would be consistent with OASIS's business case findings for traditional professional service contracting activities giving value to traditionally acquired complex services while retaining value for increasing complex integrated services.
RESPONSE: Please see the previous responses regarding scoring for minimum requirements.		
630	Section M.5., Page 100, Scoring Systems	Please confirm that if a contract does not have any small business subcontracting requirements then the least points a contractor will expect to be awarded is zero (0) points. We note that the points afforded in relation to meeting or exceeding Small Business Goals favors Large Businesses. This may adversely impact the evaluation of capable mid-tier companies whose Relevant Experience and Past Performance may relate to projects on which such companies were Small Business and therefore did not have such goals. We appreciate the Government's re-consideration to eliminate the use of ISRs to afford points and, instead, as part of Relevant Experience, ask offerors to describe how they have furthered the Federal Government's subcontracting goals over the past 5 years, either as a Small Business contractor, mentor, ISRs, etc. We appreciate the Government's comments and consideration as reflected in Clarification Q&A # 144.
RESPONSE: Thank you for the recommendation. We will take it under consideration.		
631	Section M.5, Page 101, J.4., Attachment 4.	The large per year total award value thresholds demonstrate bias against mid-tier companies to receive an adequate amount of Past Performance points as part of the total evaluation. Please consider changing the thresholds to reflect the overall value of the contract (rather than on a per year basis) or to retain per year basis and change to \$3M, \$6M, \$9M, and \$12M.
RESPONSE: Again, there is no such thing as a "mid-tier" company in federal procurement and accordingly, there can be no bias against a thing that does not exist. As we have made very clear in our responses, there shall be no consideration for any group on the OASIS Unrestricted contract. This is full and open competition.		
632	Section J.5., Attachment 5, Relevant Experience Template	To ensure accurate information is placed in the Document Reference Label column, would the Government please provide guidance within the solicitation to confirm if there is a system or method that the Government prefers for citation (e.g. Volume, Section Reference "Attachment Title.")?
RESPONSE: We will make this clear.		
633	Section J.5., Attachment 5, Relevant Experience Template	In order to ensure ease of tracking, identification, and evaluation, would the government please provide a labeling convention as it relates to SOWs and government created documents? (e.g. how should places in the document that have the information in reference to the B. RELEVANT EXPERIENCE MATRIX be identified)?
RESPONSE: We will make this clear.		
634	Section J.5., Attachment 5, Relevant Experience Template	Would the Government consider the inclusion of an indexed table of contents for Section C. documentation and making it a required component?
RESPONSE: No.		
635	Section J.8 Attachment 8, Unrestricted Cost/Price Template	Would the Government please consider updating the template Labor ID#, which currently shows 1C, to read 1G for Government site?
RESPONSE: Yes.		
636	L.5.3.1. Relevant Experience Minimum Requirements	GSA is seeking vendors who have experience delivering complex, integrated services. The requirement to have 3 of the past performance references be for work that was performed for the Federal Government appears to be an unnecessary inhibition on competition; i.e., the focus in on delivering complex, integrated systems and the ability to do this is not impacted by whether the client is governmental or commercial. Government experience enhances the ability to address those unique environmental factors faced by the government, but this ability can be acquired on other types of projects serving the government. Thus, we recommend that the requirement to have 3 government past performance reference relating to delivery of complex, integrated services be modified to delete the specification that they be government-related efforts and to evaluate such projects on an equal basis whether they were performed in a commercial or a governmental environment. We recommend then that GSA include a requirement for Offerors to discuss their experience working with federal government clients. This should address GSA's concerns without unduly inhibiting the ability of well-qualified companies to compete.
RESPONSE: Thank you for the recommendation. We will take it under consideration.		

637	H.7.5. Minimum Task Order Awards, page 50 (OSB)	It is stated "Starting from the date of the OASIS SB Notice-to-Proceed, the Contractor must attain a minimum of 3 task order awards prior to the exercise of Option I." Although the point is taken when the requirement to demonstrate success is for OASIS/OASIS SB contractors to be awarded at a minimum three Task Orders during the base period, most metrics in contracting are usually tied to monetary value. For example, if a subcontracting goal is 20%, then that 20% is a percentage of revenue, not a number of FTEs or number of hours worked on a contract. We suggest that in order to be consistent, GSA OASIS uses a monetary value in lieu of a specific number of TOs won, for example "\$4M in revenue over the 5 year base period." After all, a \$4M task order award is likely of more value to the customer, the contractor, and GSA than three TOs worth \$1M each. Would GSA entertain such a change?
		RESPONSE: No. Please see the previous responses to this subject.
638	Section L, Table, page 75 (OSB)	Suggest referencing System For Award Management (SAM) and its appropriate sections throughout the solicitations, vs CCR and ORCA.
		RESPONSE: We will.
639	Page 75, L.3. Instructions	Strongly recommend retaining the current language that affiliates, internal divisions and subsidiaries of an Offeror will be consider only if the Parent Company is the official bidding entity. This will enable those small businesses who have just graduated from the small business status to compete on more equitable basis with larger companies.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
640	Page 100, M.5. Scoring System	Recommend limiting the number of potential occurrences for OCONUS work to 1 to more accurately reflect the likely ratio of OCONUS and CONUS based task orders.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
641	Page 101, M.5. Scoring Systems	Recommend reducing the importance of the Approved Purchasing System since the currently assigned points constitutes 30% of the total Vol 5 points and can skew the overall results.
		RESPONSE: The relative importance of approved purchasing systems is unlikely to changes.
642	Attachment 4 Offeror's Proposal Checklist Section L.5.3	Pass/fail award value of \$5 million per year for relevant experience is unfairly restrictive to all but very large businesses. Recommend reducing the pass/fail award value for relevant experience. Points can still be offered for higher dollar value projects. However, lowering the pass/fail threshold will allow other offerors to make up points in other ways.
		RESPONSE: We do not share the opinion that \$5M/year is unreasonably high for an unrestricted contract.
643	B.1.3 Contract Type, Page 10 L.5.3.1, Page 85	You state this is a multiple award ID/IQ. Yet in the April 12 Clarifications, clarification #25, you state the an ID/IQ itself can't be used as past performance, only the tasks under the ID/IQ can be used as past performance. It seems reasonable that a company's ability to manage an ID/IQ and bring business to it would be of interest to GSA given awardees are required to bring a minimum amount of business to the vehicle within a year of award. While we understand an ID/IQ by itself does not show a company's ability to perform to the core disciplines, it seems that a company's ability to manage and drive business through an ID/IQ is not adequately weighted.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
644	H.6.8 CMMI Maturity Level	As stated, CMMI Maturity Level status can be attributed to a project, a division, or an entire organization. Shouldn't there be a point distinction for attaining CMMI certification at an organizational level vs. a project level?
		RESPONSE: We are examining that issue right now.
645	M.5 SCORING SYSTEM (Page 100-101)	Section H.9 details the importance of appropriate Ethics and Conduct from contractors and their employees; however, Section M does not provide for evaluating or distinguishing between offerors on this topic. The "Best in Class" contractors GSA seeks for OASIS often receive awards and recognition for their high standards. We recommend that the government consider adding a scored evaluation for Ethics and Conduct; and award up to 500 points to Companies that have received company-wide Industry and/or Government Ethics and Conduct awards. We recommend awarding 50 points for each individual award (up to 5) and rewarding consistent performance with 100 points for each repeat of the same annual award (up to 5).
		RESPONSE: This is an interesting suggestion. Please let us know what specific awards or recognition you would recommend we consider.
646	M.5 SCORING SYSTEM (Page 100-101)	GSA OASIS should consider other factors relevant to quality performance, ethics, workforce stability, and sustainability in the Past Performance evaluation. The OASIS draft RFP demonstrates an interest in these factors. Therefore, GSA should evaluate additional evidence that the contractor can provide to suggest quality performance in these arenas. Certifications and awards exist in each of the categories identified above. We recommend that GSA request evidence of these awards and other metrics such as demonstrating an organization's employee retention rates exceed that of the industry at large. Offers should receive 200 points for successfully demonstrate their successful performance in these areas.
		RESPONSE: Please provide specific examples of the metrics you are suggesting.
647	M.5 SCORING SYSTEM (Page 100-101)	Since this is primarily a professional services contract and Information Technology is a Ancillary Support Service, we believe points should only be given for CMMI level 3 as higher levels are not needed on efforts that are primarily professional services. Additionally, we believe the point value of ISO 9001:2008 should be twice the value awarded to CMMI level 3 because ISO Certification is more directly encompasses professional services
		RESPONSE: Please see previous responses to similar recommendations.

648	M.5 SCORING SYSTEM (Page 100-101)	<p>CMMI Scoring For Different Levels Does Not Currently Achieve Stated Objectives of Building Customer Demand for OASIS. 100 points is awarded to Level 3, 150 to Level 4, and 200 to Level 5. A maximum of 200 points can be earned. No one CMMI level provides more value than another to a customer. All are equally valuable, depending on customer needs and requirements. Thus, for example, a customer in need of CMMI Level 3 processes, would consider CMMI 5 of too burdensome and costly. GSA should consider the following alternatives:</p> <p>(1) provide a single point score for firms that offer CMMI 3, 4, and 5 and no points to those firms that offer less than the complete set of alternatives;</p> <p>(2) provide an equal value of points for each certification, recognizing that no CMMI level is more valuable than another to GSA customers (as a whole, though particular customers may demand 3, 4, or 5), with a cap (currently the cap is 200 points);</p> <p>(3) recalculate the points assigned to each level based on customer demand for the various CMMI levels. Thus, for example, very few customers demand CMMI 5. Thus, few points should be allocated to CMMI 5 as compared to CMMI 3. Maintain a cap (currently the cap is 200 points);</p>
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
649	M.5. Page 101	<p>ISO 9001:2008 Certification can be at the awarded at various organizational levels (whole company, single and multiple business units, or one or more projects/contracts. Since these various levels of certification may not all mean that the offeror will manage and perform OASIS work within the ISO certified entity, we recommend the be awarded to offerors that can demonstrate all OASIS work can and will be managed and conducted by an ISO Certified entity upon contract award.</p>
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
650	M.5. Page 100-101	<p>GSA's OASIS team should seriously reconsider providing different point values to different sized projects in scoring relevant experience. To our understanding, OASIS will not restrict itself to larger projects/task orders to the exclusion of smaller projects/task orders. Customers expect that each project/task order, irrespective of size, will receive the full attention of the contractor. The section M.5 volume scoring factors (L.5.3) incentivize offerors, that can, to only provide GSA with their largest projects which also score well on Past Performance (L.5.4). Bidders should be required to provide five projects from a range of project/task order sizes, and each should be provided equal weight in the scoring. GSA customers would benefit from knowing that GSA evaluated a firm's capability to deliver on projects, irrespective of the dollar value of the project. We suggest that GSA and its customers would be better served by the contractor providing 5 task orders, equally scored, for projects/task orders in the following ranges, with at least one project/task order in each of 3 categories: 1) less than \$5 M annually; 2) \$5-10 M annually; 3) greater than \$10 M annually.</p>
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
651	L.5.5.6 ISO 9001:2008 Certification (Page 89)	<p>GSA's OASIS team should ensure that each project was conducted under the aegis of an ISO 901:2008 certified organization. GSA is concerned with quality performance. ISO 8001:2008 is a quality process applicable to a broad spectrum of operations and domains, as identified in the draft RFP. GSA should ensure that all relevant projects were conducted by ISO 9001:2008 organizations.</p>
		RESPONSE: This would make ISO 9001:2008 a pass/fail requirement. While quality is an area we are trying to consider, we are unlikely to do that.
652	M.5 (page 100-101)	<p>Providing higher scores to projects that touch a greater number of core disciplines may have no real relationship to the contractor's ability to integrate across disciplines. Any project involving 4 or more core disciplines, and conducted under the aegis of ISO 9001:2008 standards, should receive equal points. While one project may "touch" 5 or 6 core disciplines, it may touch one or more of them lightly, with little impact on the contractor's successful performance of the overall effort. A project that involved tight integration of complex requirements in 4 of 6 areas may demonstrate greater integrated skills than a project that exhibited a lighter touch in each of those core disciplines. We recommend that scoring factors L.5.3 be revised to address this reality.</p>
		RESPONSE: We do not necessarily agree with this position, but we will take it under consideration.
653	L.5.3.1 (page 85) and M.5 (page 100-101)	<p>Past Performance should be limited to those projects conducted under an ISO 9001:2008 organization. Many companies receive ISO 9001:2008 for particular segments of the organization. Only those projects performed by 9001:2008 organizations should be included in the past performance review. We recommend that points for ISO 9001:2008 should not be awarded unless the offeror provides five (5) past performances that have been performed by an ISO 9001:2008 certified organization. Additionally, points should not be awarded for CMMI certification unless all five (5) of the past performances provided were performed by a CMMI certified organization. The same should hold true for AS910 certification scoring.</p>
		RESPONSE: Please see previous responses to similar recommendations.
654	M.5 SCORING SYSTEM (Page 100-101)	<p>ISO 9001:2008 Merits a Higher Score than CMMI: A bidder can receive a maximum (cap) of 200 points for CMMI, whereas ISO 9001:2008 certification is valued at 150 points. As noted several times by the GSA OASIS team, this is not an IT contract. Yet, CMMI receives a higher point total than does ISO certification. As ISO is relevant to all lifecycle phases and all core disciplines, as well as mission spaces, areas of expertise, and ancillary support services and products, ISO certification merits a greater point total than does CMMI. In addition OASIS has a global scope. ISO is an internationally recognized standard. Thus, ISO is relatively more important to assuring bidder quality than is CMMI.</p>
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
655	L.5.3.1. Page 80	<p>We believe the requirement for small businesses to have five distinct prime contracts that average \$750,000/year is a prohibitively high threshold for small businesses in SBA's <\$7 million distinction. We recommend reducing the requirement from five (5) prime contracts to three (3) prime contracts to allow more SBA <\$7million distinction small businesses to compete in OASIS SB.</p>
		RESPONSE: Please see previous responses to similar recommendations.
656	L.5.5.11.1 Page 85	<p>We believe the requirement for the COPM to have "demonstrated experience in promoting and managing multiple award, "multiple agency, or **agency-wide contract vehicles" is a prohibitively high threshold for small businesses in SBA's <\$7 million distinction. We recommend removing this requirement to allow more SBA <\$7 million distinction small businesses to compete in OASIS SB.</p>
		RESPONSE: We have no size standard on OASIS of less than \$14M/year.

657	L.5.3.1. [Page 85]	<p>Summary of RFP item [Re: Integration of four of six OASIS core disciplines] The RFP states that, "Offeror must demonstrate Five (5) distinct projects" that meet the following condition: "2. Involve the performance and/or integration of at least Four (4) out of the Six (6) OASIS Core Disciplines."</p>
		<p>Comment [Re: Integration of four of six OASIS core disciplines] For some task orders, integrated past performance in four or more core disciplines may be needed (e.g., the task order requires performance of four core disciplines).</p> <p>However, deeper experience in one specific core discipline may at times be more valuable than past performance in four of the core disciplines. For example, some contracts may require deep expertise in one specific area (e.g., financial services, including financial data quality assessment, improper payment compliance, and credit reform accounting). In the case of financial services (e.g., audit readiness), unless the client's business includes logistics, science, or engineering, our experience is that these four core disciplines typically are not found on the same project.</p>
		<p>Limiting past performance evaluation at the IDIQ level to only projects that demonstrate integration in four or more of the core disciplines could exclude the most relevant past performance projects when evaluating contractors and consequently reduce competition. The core disciplines that are relevant at the task order level may be different than those demonstrated in the past performance citations. Consider two hypothetical examples based on our understanding:</p> <ul style="list-style-type: none"> o A contractor that submitted past performance projects that integrated these four core disciplines: 1. scientific, 2. engineering, 3. logistics, and 4. program management (but not financial) WOULD be eligible to bid on a financial discipline task order; but a contractor recognized for its financial services expertise and that submitted past performance projects that integrated these three core disciplines: 1. financial, 2. management consulting, and 3. program management services WOULD NOT be eligible to bid since they don't meet the IDIQ minimum criteria. o AND all other things being equal, a contractor that submitted past performance projects that integrated these five core disciplines: 1. scientific, 2. engineering, 3. logistics, 4. program management, and 5. management consulting (but not financial) would score higher on the OASIS scoring point system than a contractor known for its financial services expertise and that submitted past performance projects that integrated these four core disciplines: 1. financial, 2. management consulting, 3. engineering, and 4. program management.
		<p>Recommendation [Re: Integration of four of six OASIS core disciplines] We recommend that the requirement for past performance in four or more of the core disciplines become a feature of the IDIQ contract, but not a requirement or evaluation criterion.</p> <p>OASIS contractors could be categorized based on past performance where they have integrated across multiple core disciplines. Doing so would give the client agencies the option and flexibility to write a performance work statement where past performance credentials encompass multiple core disciplines (i.e., two, three, four, or even all six OASIS core disciplines) and specify which of the core disciplines matter the most.</p>
		<p>RESPONSE: You seem to be recommending defacto functional areas. One of the primary advantages (in our opinion) of evaluating the ability to perform integrated work, is that you have the reasonable assurity that companies who can perform the complex can perform the more simplistic whether through their own corporate resources and expertise or through a subcontractor. We also feel that when you have a group of Contractors who have demonstrated that they can cover the spectrum of services, OCOs can drill down to greater expertise or higher relative importance of a given field of a given requirement at the task order level within that pool. However, the reverse is not necessarily true. With a group of Contractors who are more specialized in their expertise, an OCO has no real assurance that they can perform integrated work that may fall outside of the true <u>core competencies</u>.</p>
658	L.5.3.1. [Page 85]	<p>Summary of RFP item [Re: Contract award value of at least \$5M per year] The RFP states that, "Offeror must demonstrate Five (5) distinct projects" that meet the following condition: "3. Have a total award value of at least \$5 Million Per Year."</p>
		<p>Comment [Re: Contract award value of at least \$5M per year] For some task orders, the contracting agency may want to only consider contractors that have at least five (5) past performance credentials where the contract total award value was at least \$5 million per year; and for other task orders, the contracting agencies may only want to consider contractors with past performance credentials where their contract award value met even larger award value thresholds (e.g., \$10 million or \$20 million per year).</p> <p>However, for some task orders, the past performance award value thresholds may be much lower (e.g., because the size of the task order under consideration is much lower). By limiting past performance evaluation at the IDIQ level to only projects that have a total award value of at least \$5 million per year, this could exclude the most relevant past performance projects when evaluating contractors and consequently reduce competition.</p>
		<p>Recommendation [Re: Contract award value of at least \$5M per year] Make the requirement for past performance to be at least \$5 million per year a feature of the IDIQ contract (but not a requirement or evaluation criterion).</p> <p>Instead, categorize OASIS contractors based on the size of their past performance awards (e.g., less than \$1 million; between \$1 million and \$5 million; or between \$5 million and \$10 million).</p>
		<p>RESPONSE: We aren't sure what you mean by "categorize". It seems that you are suggesting to include not only functional areas, but also different levels of contractors within those functional areas based upon the size of their past performance. We are highly unlikely to implement these recommendations for many reasons.</p>

659	OASIS Blog Post 4/19/2013 Change to Section L.5.5.1. [Page 87] M.5. [Page 100-101]	Summary of RFP item [Re: DCAA or DCMA audited accounting systems] [OASIS Blog Post 4/19/2013] "We are removing the requirement to have a DCAA audited accounting system as a Pass/Fail element. However, Offerors must still have an accounting system that meets FAR requirements. While a DCAA audited accounting system is preferable, we will allow companies with accounting systems that have not been audited by DCAA to compete for an OASIS award. In order to meet the minimum requirements, a Non-DCAA audited accounting system must be operational and have been audited by either a cognizant non-DCAA government auditor or an independent, third party accounting firm that has certified the accounting system for compliance with the same standards set forth in SF1408, Preaward Survey of Prospective Contractor Accounting System AND FAR Part 31. Recognition of already having a DCAA audited accounting system is now present in the scoring system as a significant factor." [RFP Section M.5. Page 100-101] The scoring system awards points for acceptable estimating systems and approved purchasing systems: L.5.5.3. Acceptable Estimating System; L.5.5.5. Approved Purchasing System.
		Comment [Re: DCAA or DCMA audited accounting systems] Based on the OASIS 4/19/2013 blog post, GSA has removed the requirement for a DCAA audited accounting system and deleted the requirement for at least one of the Relevant Experience examples to be cost reimbursable contract type. However, similar requirements for certified accounting systems remain; and "Recognition of already having a DCAA audited accounting system is now present in the scoring system as a significant factor."
		There are instances when cost reimbursable contracts are necessary. And 'certified accounting systems' are a critical condition to support these contracts. 'Certified accounting systems' help prevent contractors from billing the government for unallowable costs.
		But there are also challenges with cost reimbursable contracts: o The government incurs additional administrative costs on top of what it is paying the contractor (e.g., cost surveillance of contractors) o Access to the full complement of services offered by contractors may also be constrained. - Large professional services firms have significant 'reach back' to access to a variety of subject matter experts - They work best when they operate as integrated organizations - For example, personnel can more seamlessly serve public and private clients - Some large companies create separate business units to deliver services to Federal agencies in order to make it more feasible to certify 'certified accounting systems' - However, when a company separates their business units and accounting systems, the access to the rest of the company's resources may be significantly constrained
		If the requirement for certified accounting systems reduces the number of qualified contractors for the IDIQ contract, then competition at the task order level may be reduced. It is also likely that a large number of task orders issued under OASIS will be firm fixed price, which would not require an 'certified accounting system.'
		Recommendation [Re: DCAA or DCMA audited accounting systems] We recommend only requiring cost reimbursable contract pricing at the task order level, when necessary. Cost reimbursable contract pricing could become a feature of the IDIQ contract, but not a requirement or evaluation criterion. We recommend that GSA categorize contractors based on cost accounting standards criteria; but do not limit those contractors that don't intend to bid on cost-reimbursable from being eligible for award. This approach will provide contracting agencies the flexibility of when (and when not) to require cost reimbursable contract pricing, while expanding competition.
		RESPONSE: The statistics suggest the following approximate ratios: Cost Reimbursement - 50%; Fixed Price - 35%, Time and Materials - 15%. Accordingly, Cost Reimbursement is our focus and we shall ensure that all OASIS and OASIS SB Offerors can compete for cost reimbursement task orders.
660	L.5.3.1. [Page 85]	Summary of RFP item [Re: Three of five past performance projects must be for Federal government] The RFP states that "Offeror must demonstrate Five (5) distinct projects" that meet the following condition: "6. At least Three (3) out of Five (5) projects must be for work that was for the Federal government"
		Comment [Re: Three of five past performance projects must be for Federal government] Federal government contracting is significantly different from non-Federal contracting. As a result, the nature of Federal project past performance differentiates contractor capabilities in some significant ways (e.g., Federal financial management experience vs. commercial financial management experience). However, if the other requirements outlined in section L.5.3.1. remain (e.g., performance and/or integration of at least four of the OASIS core disciplines; and each project must have a total award value of at least \$5M per year), we believe this could limit competition.
		More specifically, it is possible that the combined RFP past performance requirements create a circular barrier to entry. In order for contractors to demonstrate they have met the past performance requirements, they must be eligible to compete for task orders under IDIQ type contracts (such as OASIS); however, only contractors that meet these significant requirements are eligible to be awarded OASIS contracts, and those contractors that exceed these requirements earn more points per element. This could become problematic if OASIS becomes the 'IDIQ-type contract of choice' for contracting agencies.
		There are circumstances when the merit of non-Federal past performance credentials could be greater than Federal past performance credentials (including relative to those contractors who only have Federal experience). Furthermore our experience is that some Federal agencies want to hire contractors that have commercial experience. However, the draft RFP indicates that GSA will only consider two of these past performance credentials.

		<p>Recommendation [Re: Three of five past performance projects must be for Federal government]</p> <p>We recommend eliminating the requirement that "At least three (3) out of five (5) projects must be for work that was for the Federal government." Contractors should be permitted to use more than two (2) non-Federal past performance to meet the other requirements outlined in section L.5.3.1. (e.g., performance and/or integration of at least four of the OASIS core disciplines; and each project must have a total award of at least \$5 million per year).</p> <p>Contactors could be categorized based on the contracting agency type for each past performance credential submitted (e.g., All five were for Federal agencies; four of the five were for Federal agencies and one was commercial, etc.). This gives the contracting agencies the option and flexibility to write a performance work statement where past performance credentials must be (or need not be) for the Federal government.</p>
		<p>RESPONSE: We are considering the limitation of commercial examples, but have a fundamental problem with those examples. Our evaluation system is most heavily weighted towards past performance. For Government examples, past performance comes from a Government employee(s) who have no financial interest in the company being evaluated. However, on the commercial side, we have no way that we can think of to counter potential financial conflicts of interest when it comes to past performance surveys. As stewards of the taxpayer trust, we simply cannot award Government contracts based primarily on information that may be tainted by financial influence. Furthermore, some of the feedback we have received suggests that commercial firms will not provide past performance survey information at all. We have asked for a solution to this dilemma from literally dozens of businesses and have never received an answer. We will post a blog on this issue soon.</p>
661	<p>M.5. [Page 100-101]</p> <p>Scoring revised in 4/19/2013 blog post</p>	<p>Summary of RFP item [Re: Scoring system]</p> <ul style="list-style-type: none"> o Scoring system point values for Federal past performance are triple that for non-Federal projects. For example: <ul style="list-style-type: none"> - Point value is 100 for average rating of "5 - Exceptional" on Non-Federal Projects - Point value is 300 for average rating of "5 - Exceptional" on Federal Government Projects o Scoring system point values for past performance increase with size of award value. For example: <ul style="list-style-type: none"> - Point value is 50 for projects that exceed \$10 Million per year in total award value - Point value is 75 for projects that exceed \$20 Million per year in total award value o Scoring system points are awarded for specific systems and certifications, such as: <ul style="list-style-type: none"> - ISO 9001:2008 Certification - CMMI maturity level 3, 4, and 5 - Top secret facility clearance
		<p>Comment [Re: Scoring system]</p> <ul style="list-style-type: none"> o Some task orders will benefit from the scoring system thresholds and associated point values outlined in the OASIS draft RFP. For example: <ul style="list-style-type: none"> - A software development project may benefit from a CMMI certification - A project that requires the performance of classified work may benefit from a contractor that has built a top secret facility o However, for other task orders, the point values at the IDIQ level may have little or no bearing on the qualifications of the contractor. For example, all other things being equal: <ul style="list-style-type: none"> - If a task order is issued for an estimated value of \$500K, is the contractor that has past performance citations valued at \$10 million (total per year) any more qualified for that scope of work than another contractor that has a past performance citations valued at \$5 million (total per year)? - If a task order is issued for non-classified work, is the contractor that has a top secret facility security clearance any more qualified for that scope of work than another contractor that does not have a top secret security facility clearance?
		<ul style="list-style-type: none"> o Other factors NOT included in the IDIQ level scoring system might be more valuable for other task orders o To the extent that the scoring systems encourage contractors to acquire specific systems and certifications, this may increase their overhead costs (e.g., cost to build a top secret facility). <p>If qualified contractors are excluded from OASIS contract awards because their point score total was below the top forty for their pool, then competition at the task order level may be hindered.</p>
		<p>Recommendation [Re: Scoring system]</p> <p>We recommend adjusting the IDIQ level scoring system so that it does not award points on factors that are better suited to the task order level. Pre-screened information about contractors should be provided to contracting agencies to help inform the agencies about the contractor's capabilities when establishing a scoring system; however, task order specific scoring systems (e.g., factors and points) should be left at the discretion of the contracting agency in order to match the task order requirements.</p>
		<p>RESPONSE: Thank you for the suggestions and level of effort that you have put into this, but we see significant problem areas with your recommendations.</p>
662	<p>Recommended changes summary</p>	<p>Recommended changes summary</p> <p>This section summarizes the recommendations outlined above. We look forward to an opportunity to discuss these in-person with GSA.</p> <ul style="list-style-type: none"> o Shift several of the requirements and scoring evaluations to the task order level. o Categorize OASIS contractors based on specific criteria rather than requiring them to meet the criteria. The contracting agencies could consider this information when establishing requirements or a scoring system so that only qualified contractors for the specific task order are permitted to bid on a task order. IDIQ awardees can be categorized based on past performance and other criteria gathered through the OASIS procurement, such as: <ul style="list-style-type: none"> - Where they have integrated across multiple core disciplines - Those that have 'certified accounting systems' for cost reimbursable task orders - Achieved CMMI maturity level 3, 4, or 5 - Top secret facility clearance - Minimum of 5 past performance projects that exceed \$5 Million per year in total award value

		<p>o The approach of categorizing contractors achieves the objective of increasing competition without overly burdening the acquisition process.</p> <ul style="list-style-type: none"> - Only bidders that meet that specific criteria would be eligible to bid on specific task orders - However, when the criteria are not relevant to the task order, then the competitive pool is expanded <p>o Leave task order specific requirements and scoring systems (e.g., factors and points) to the discretion of the contracting agency to match the task order requirements. This approach would provide the contracting agency the flexibility of when (and when not to) establish requirements and scoring criteria most relevant to them.</p> <p>We believe these recommendations are in line with goals of the OASIS acquisition.</p>
		<p>RESPONSE: We feel that your primary recommendations of "categorizing" contract awardees will be administratively complex and more importantly, will likely run into severe problems with CICA and Fair Opportunity requirements. Thank you, however, for sharing your thoughts. We will consider everything and glean what we can from the suggestions you have provided.</p>
663	H.4.2.1	<p>The 6 Pools are defined by SB size standards with NAICS codes mapped into those pools based upon the size standard applied to each NAICS code. In doing so, OASIS has essentially defined the work scope (as defined by the NAICS codes themselves) that is allowed within each pool. That construct seems to contradict the OASIS business case founded on the premise that OASIS would provide complex solutions, encompassing a wide array of services (i.e. work scope), not available within existing GSA contracts/schedules. Specifically, this construct creates stovepipes of allowable work within each Pool, effectively prohibiting the delivery of complex solutions. How does OASIS expect to provide Government clients access to complex solutions requiring expertise and services across a wide array of disciplines given this construct?</p>
		<p>RESPONSE: Please see previous responses to similar questions.</p>
664	H.7.5	<p>Minimum Task Order Awards, indicates that an OASIS contract holder must attain 5 task order awards prior to the exercise of Option 1 and that failure to do so will result in being off-ramped from the contract. This requirement implies that contractors can control three things that are wholly outside of their control: 1) the solicitation of task orders for which the company is well-positioned to win, 2) the number of tasks solicited/awarded, and 3) the number of of task orders awarded to the company. While the intent of this clause is undoubtedly to ensure active participation and competitiveness throughout the contract period of performance, defining those elements in terms of quantifiable things wholly outside of the control of any company is inappropriate. For example, a contract holder may actively pursue 100% of the task orders solicited, submitting competitive proposals in each case.</p>
		<p>However, if the Government does not choose to award at least 5 of those task orders to the company, the company will be off-ramped even though that company has been effective in providing competition for every task solicited by the Government. Similarly, the Government would need to guarantee at least 1200 task order awards prior to the exercise of Option 1 to provide fair opportunities for at least 5 task order awards to each contract holder (40 contracts in each of 6 Pools). We recommend the criteria for placing a contractor into Dormant Status or initiating the Off-Ramp clause be changed to reward contract participation and competitiveness as measured in terms that each Contractor can control. Examples could include participation in OASIS program meetings, compliance with OASIS contract marketing requirements, and/or submittal of offers on an appropriate percentage (%) of task order solicitations. While the latter is likely to result in the submittal of "compliant" bids, it is one of the few measures of contractor participation that can be quantitatively measured and is within the control of the Contractor to achieve.</p>
		<p>RESPONSE: Please see responses to similar recommendations. We will look at each and every instance of contract noncompliance to ascertain the reasons for the noncompliance. We shall never implement a requirement that encourages the propagation of "compliant" proposals to satisfy an activity level. In fact, we will question OCOs about the quality of proposals received on OASIS contracts to ensure low-quality proposals are not being provided by our Industry Partner pools. The basic requirement is to be reasonably successful on the OASIS contracts or allow some other company to try. Contractors may not be in complete control of what they win, but they certainly influence it. Regardless, for whatever reasons, if a Contractor isn't having success on OASIS after 5 years, we feel it is probably unlikely that the next 5 years will be much different.</p>
665	F.4.1 Deliverable and Reporting Requirements	<p>Will GSA consider allowing the contractor to provide the update for Accounting System, Purchasing System, various Certifications, etc. to 10 business days after the update (vs. 3 calendar days after the update). This allows the contractor sufficient time to ensure they are compliant with their OASIS Deliverables.</p>
		<p>RESPONSE: We are providing a longer timeframe.</p>
666	F.4.2 Compliances Page 26 G.3.3	<p>Subcontracting Goals and Reporting - We request that the Compliance requirement state: " The contractor shall make a good faith effort to submit time and accurate ISR and SSR subcontract reports and meet or exceed subcontracting goals in accordance with the Contractor's subcontracting plan or adequately document reasonable rationale for not meeting subcontracting goals. (this is consistent with the FAR 19.7)</p>
		<p>RESPONSE: No. The "good faith effort" applies to meeting the goals, not filing the reports in a timely manner.</p>
667	G.3.5 Task Order Close-out	<p>Cost Type Task Orders may not be able to close-out within the 60 day period stipulated in this section. DCAA back log of incurred cost audits is extensive. The back-log is a significant issue. Suggest softening of language for a 60 day closure of the TO allow for this issue.</p>
		<p>RESPONSE: We are editing this.</p>
668	H.6 Systems, Compliances, and Certifications	<p>Will the Government re-consider allowing certifications from a subsidiary and/or affiliate of the contractor. We understand the importance of systems and compliances coming from the official legal name of the company on the award document; however, due to the construct of some businesses within industry, certifications often still reside within an affiliate or subsidiary. This allowance should promote competition from small and medium size companies that do not necessarily have the resources in this area that the very large companies have available.</p>
		<p>RESPONSE: We aren't sure how you "share" a certification, but we are looking into this.</p>

669	H.6.2 Acceptable Estimating System/L.5.5.3 Acceptable Estimating System/M.5 Scoring System	An Acceptable Estimating System that is approved by the DCMA is given 100 points in section M.5. Due to backlog within the DCMA to conduct evaluations of Estimating Systems, contractors are not able to get approval of their estimating systems in a timely manner. Will GSA consider reducing the number of points for an Acceptable Estimating System to 50 points vs. 100. This is more fair than providing a scoring of 100 points for DCMA approval considering the extensive backlog at DCMA for auditing/approving estimating systems.
		RESPONSE: We will consider your recommendation, but are unlikely to implement it.
670	H.6.5 Approved Purchasing System	This section indicates that the OASIS website will maintain a record of each OASIS Contractor's Status of an Approved Purchasing System. Is it the Government's intent that this information will be available to all OASIS awardees? We recommend that GSA only allow OCOs access to this information. This is not information that should be available to other awardees/primes.
		RESPONSE: Please provide the rationale behind this recommendation. We aren't sure we understand what the sensitivity is regarding this.
671	H.6.8 CMMI Maturity Level/M.5 Scoring System	Section M.5 stipulates point totals of 100 for CMMI Level 3; 150 for CMMI Level 4; and 200 points for CMMI Level 5. Giving companies 200 points out of a total 1600 points for Volume 5 is weighted too heavily for this requirement. Recommend the Government consider awarding 100 points to companies that have received CMMI Levels 3, 4, or 5. The existing point grading for CMMI is providing 12% of the Volume 5 point total just for Level 5 Certification. CMMI Level 5 should not be given this amount of weight within this volume. The relationship between being an effective OASIS awardee and achieving CMMI Level 5 is not highly correlated.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
672	H.6.9 Earned Value Management System/M.5 Scoring System	Section M.5 awards 100 points for having an EVMS ANSI/EIA Standard-748. This constitutes 5% of scoring for Volume 5. This appears to be weighted too high given EVMS relevance on OASIS. Will GSA lower the point total to 50 points for the EVMS system?
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
673	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
		RESPONSE: Please see previous responses to similar recommendations.
674	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 offeror's 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: Please see previous responses to similar questions. The core disciplines apply to ALL NAICS code work. The pools simply segregate size standards.
675	L.5.5.11.2 COCM and M.5 scoring System	It is encouraged that the COCM have an MA and at least one Professional Acquisition Certificate to receive 100 points in section M.5. We believe this is too restrictive and suggest that the government make the following changes. Allow experience substitution for MA degree. 15 years experience in Contract Management is equivalent to a MA and should be allowed to have the 50 points awarded. The Certification requirement is too restrictive and does not allow the submission of certification in contract management from accredited colleges or other industry accepted sources. Request that the government allow substitution of other industry certifications in contract management then just NCMA certification.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
676	K.1 Representations and Certifications Page 63 paragraphs 2,3, 4 etc.	Recommend change ORCA references to SAMS
		RESPONSE: We shall.
677	L.4 Proposal Format Page 77 Section L.5.2.2	Recommend change ORCA references to SAMS
		RESPONSE: We shall.
678	L.5.2 Volume 2 Responsibilities Page 84 paragraph 2	EPLS no longer exists as a separate Government Website. Please exclude reference and replace by referencing SAMS and the exclusion listing in company entity records.
		RESPONSE: We shall.
679	L.5.4.3 Socio-economic Past Performance Page 87 Paragraph 2	You are asking for references that may not exist at the TO level. Normally there is no final SSRs submitted in the ESRS for individual task orders under GWACS or GSA Schedules or other agencies vehicles. Please require only the ISR for a task order if available. SSR normally are only provided for and at Agency levels.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.

680	L.5.1.6 Subcontracting Plan	We recommend that the Government make it clear that only one plan is to be submitted.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
681	L.5.4.3	<p>We are committed to utilizing Small Businesses in all of our contract activity even when many contracts that we have in the intelligence community do not have stated goal for Small Business (SB) utilization. We believe that the use of small businesses, when no explicit goal is stated, reflects more highly on support for socio-economic communities than meeting a stated criteria. In the absence of stated Small Business goals, we recommend that GSA OASIS provide credit for SB utilization where the Offeror can demonstrate that it has exceeded the statutory requirements.</p> <p>Typically, even when SB utilization goals exist, classified contracts are not entered into the eSRS System. Therefore, we recommend GSA permit OASIS Offerors to submit Individual Summary data (identical to the types of information that would be provided to the CO for eSRS) certifying to SB utilization directly to GSA OASIS as part of the proposal submission.</p>
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
682		Setting up several "pools" of services (H.4.2.1) seems to violate one of the original objectives of OASIS which is to enable agencies to acquire complex integrated professional services across multiple areas. The RFP (M.2.) states that GSA intends to make 40 awards in each pool. Although offerors may submit a proposal and be awarded a contract in multiple pools, there is a high probability that some companies may qualify for an award in only one or two pools. It seems that only the very largest contractors would have the breadth and depth of experience to be awarded a contract in more than two or perhaps three pools. A government customer with truly complex requirements requiring a solution that cuts across three or four pools would have competition limited to only a relatively small number of offerors that were awarded all of those pools.
		RESPONSE: Please see previous responses to similar comments.
683		Will GSA eliminate the pool concept for OASIS Unrestricted contract and award a larger number of comprehensive contacts (up to 240) with a scope that includes the services of all six pools? Offerors would be required to provide demonstrate corporate experience in at least 3 of the 6 services areas and meet all other provisions of the contract. This would simplify use of the contract by federal agencies and encourage teaming to fulfill the requirements of individual task orders while also facilitating use of small businesses as subcontractors and thus enable the prime contractor to meet their required small business goals. An alternative to eliminating all 6 pools would be to combine pools 1 and 2.
		RESPONSE: No. Please see the previous responses to this subject.
684	G.3.5.1 Task Order Close-out Report / Page 34	GSA has specified a system, OASIS Management Module Reporting System (OMMRS), to capture all task order awards, mods, invoices and CAF payment data. Similar to 8a STARS II, it is recommended that OMMRS also captures task order close-out data in lieu of vendors preparing and submitting annual reports manually.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
685	<p>1) H.6.1. – H.6.5. Adequate Accounting System and Other audits / Page 42 – 44;</p> <p>2) L.5.5.1. Adequate Accounting System / Page 82; and, 3) M.4.5.1 Adequate Accounting System / Page 94</p>	<p>These audit requirements for small businesses to be eligible to compete on OASIS will restrict competition. DCAA, DCMA or other Cognizant Audit Agency audits occur ONLY if requested by a Federal Government agency. With a substantial increase in FFP contracts/task orders, and substantial decrease in T&M/LH and cost type contracts/task orders across all Federal agencies, makes it virtually impossible for a small business to receive or be required to receive an audit. Additionally, audit requests are a cost to Civilian agencies and therefore are minimized, unless absolutely necessary. Suggested Options: (1) Accept third party audit documentation that confirms the vendor's accounting system is DCAA compliant, followed by a GSA requested audit at time of award; (2) GSA request the audit after award is made; or (3) other solution meeting the requirements that will not exclude small businesses from being eligible to propose, such as ineligible to compete on cost type task orders.</p>
		RESPONSE: Please see previous responses to similar recommendations. We have changed the requirement.
686	H.7.5. Minimum Task Order Awards / Page 50	The number of task order awards each small business will receive under OASIS is contingent upon the number of awardees (at least 40 vendors per pool), extent of competition at the task order level, and federal agency use. For GSA to mandate a minimum of 3 task order awards within 5 years may be unattainable even though a vendor is actively competing on task order requests. Suggest changing the language from "must" to "shall" but contingent upon GSA's review of the vendor's proposal activities before determining dormant status or off-ramping.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
687	L.5.3.1 Relevant Experience Minimum Requirements / Page 80	The requirement to demonstrate 5 distinct projects, each as a prime, having a total award value of at least \$2M annually, AND at least one project "must" be for work performed under a cost-reimbursement contract type, AND must include at least 3 of the 6 core disciplines, is restrictive. Again, this requirement will eliminate many small businesses from being eligible to propose. If this requirement does not change, GSA may fail to accomplish its small business goals and set-asides based on the individual socio-economic programs. Recommend reducing the number of projects to 3, at least one total award valued at \$2M annually, and eliminate the cost reimbursement contract type.
		RESPONSE: Please see previous responses to similar recommendations and check for changes.
688	Page 36, G.3.10 FSRS Reports	FAR citation should read 52.204-10 in lieu of 52.304-10.
		RESPONSE: Thank you for the edit.
689	Section H.12, Page 54	Recommend a case-by-case review for contractors under consideration for placement into dormant status. Attaining a minimum of five task order awards is a reasonable number. However, meeting this requirement can be subject to factors beyond the control of the Contractor and there may be a valid reason for a Contractor having less than a minimum number of awards. Therefore a case-by-case review may be merited.
		RESPONSE: All Dormant Status issues are case by case. Please see previous responses on similar recommendations.

690	Section M.5, Page 100	The Scoring System penalizes successful Small Business who recently became ineligible to compete as a Small Business under certain NAICS codes due to their success and growth. As a successful small business, recently transitioned to a Mid-Tier Business, we are competing in the unrestricted category. We do not have a record of meeting or exceeding our socio-economic goals because as a Small Business we were not required to report it. Therefore, we will not gain any points in the objective scoring system. There needs to be an alternative for a transitioning Small Business to get credit for meeting socio-economic goals.
		RESPONSE: Please see previous responses on similar recommendations.
691	Section L.6, Page 92	Pricing – will you allow for geographic rate differentiation? For example, a civil engineer working in New York City would have a higher billing rate than one working in Little Rock, AR.
		RESPONSE: We have. The direct labor ranges we are using for fair and reasonable pricing include the highest in the country.
692	General Comment	OASIS should recognize that firms with \$14.1 million annual revenue will not be able to highlight projects in the \$5 million per year value much less \$50 million per year revenue which exceeds their total annual revenue. The solution is for the federal government to recognize that there are more than two types of businesses. To ensure diversity consider three levels: small, mid-tier, and large. Adding a Mid-Tier level with a project threshold of \$1 million per year and allowing multiple task orders that rollup under one IDIQ that equals \$5 million per year would allow large small businesses or Mid-Tier businesses to successfully compete.
		RESPONSE: Please see previous responses on similar recommendations.
693	C.2.1.5, page 19	In which NAICS code and Pool are these logistics services covered? Recommend adding: NAICS 561621 to cover Security (#18), 484121 for Transportation and Delivery (#5), 561210 to cover Supply Chain Mgmt (#19), Repair & Alteration (#17), and Infrastructure Services (#5).
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
694	H.6, page 42	The Government must know and understand that DCAA have expressed to industry that they do not and will not provide results of systems audit to us. They are only obligated to provide results of their audit to government officials ONLY. So, Task Orders should not require contractors to provide proof of adequate business systems since the report is only provided to the Government Contracting Office. However, the OASIS CO should provide contractor a copy for its own record for file.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
695	L.5.5.11, page 85	Most of our employees are prior/retired/wounded military personnel with tremendous experience, but because of a protracted war they have not been able to obtain certain certifications you require in these paragraphs. Recommend you make allowances (give credit) for a certain number of years experience and also give the military service member a period of time to obtain certifications to include accepting interim security clearances.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
696	L.3 (as to be revised per BLOG postings), L.5.5.3 through L.5.5.9 and M.5 (Scoring System)	As other industry partners have identified, there is a distinction between an ISO9001:2008 certification which addresses overall quality and management and AS9100, CMMI and EVMS certifications which are more project or task performance based. It may be reasonable to require that ISO9001:2008 certifications are held by the Offeror. However, with regard to AS9100, CMMI and EVMS, GSA's objective of ensuring that the certification will be applied to benefit OASIS performance is better served by permitting the certification to be held by the affiliate with the technical expertise that will be fulfilling that activity as part of integrated performance on an OASIS TO. Further, the certifying organizations are focused on the performing, organizational component versus the legal entity with a distinct CAGE code or DUNS number. A certified "organization" may encompass multiple such legal entities.
		In adopting an approach where the certifications could be held at the affiliate and/or subsidiary level (or and "organization" within the entity), the meaningful relationship documentation would be required to substantiate how the certification held by the affiliate or subsidiary would be used in OASIS performance. During contract administration, the Offeror would be required to demonstrate not only that the certification that was scored is still in force but also that the affiliate/subsidiary holding the certification was delivering services/solutions using the certification under the OASIS TOs.
		Based on this rationale, we respectfully request that offerors be permitted to provide evidence of AS9100, CMMI and EVMS certifications at the offeror, affiliate or subsidiary level subject to the provision that the meaningful documentation letter substantiate how GSA's OASIS customers will benefit from the certification in order to be eligible for scoring.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
697	Unrestricted Solicitation M.5	Issue Topic: Relative Weighting of ISO 9001:2008 versus AS9100, CMMI, and EVMS: We understand GSA's desire to use certifications as evidence of offeror excellence and as a predictor of high-quality performance. However, the current relative scoring among ISO 9001:2008, AS9100, CMMI, and EVMS does not accurately reflect the most expected benefit to OASIS customers during performance. We respectfully suggest that based on the current OASIS scope of work and the examples of likely OASIS task orders presented by GSA and potential customers, GSA consider the following scoring as a better alignment of scoring to expected performance benefit at the task level: ISO 9001:2008 – 200 points (versus 150), AS9100 – 75 points (no change), CMMI Level 2 - 50 points (versus 0), CMMI Level 3 - 75 points (versus 100), CMMI Level 4 - 100 points (versus 150), CMMI Level 5 - 125 points (versus 200), (Max Score Available for CMMI = 125)(versus 200)
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
698	Section L.5.3.1. Relevant Experience Minimum Requirements, Page 85	The requirement for the integration of 4 out of the 6 OASIS Core Disciplines in the Unrestricted draft solicitation is overly restrictive. While we understand that the government would like to obtain companies that have performed these complex tasks, the current requirements, which focus on volume, will not necessarily result in the best-qualified companies receiving the highest scores. We suggest reducing this requirement from all 5 Prime contracts to 1 or 2 Prime contracts.
		RESPONSE: We do not feel that this requirement is unreasonable for an unrestricted, full and open competition. Furthermore, we do not feel that 5 examples represents focus on "volume".

699	Section M Evaluation Factors for Award, Pages 95-102	We believe that the evaluation criteria overemphasize certifications and form as opposed to substantive experience and capability. The evaluation criteria, as currently structured, will unnecessarily eliminate many qualified companies and reduce the overall level of competition. We suggest both reducing the relative evaluation of certifications regarding past performance and also eliminating extra points to be awarded for CMMI levels 4 and 5, which do not relate directly to many professional services contracts.
		RESPONSE: As certifications are a part of the lowest weighted evaluation factor, we respectfully disagree with your opinion that they are overemphasized.
700	Section M.5 Scoring System, Pages 100-101	Mid-size companies are heavily disadvantaged based upon the scoring system that awards far greater point values to exceptionally large contracts. We ask that the government please consider a revision of the point scoring to enable mid-size companies to participate in the OASIS contract.
		RESPONSE: Please see previous responses to similar recommendations.
701	Section M.5 Scoring System, Pages 100-101	We ask that the government please consider a revision of the ratings of meeting or exceeding small business goals relative to the specific requirements for the contracts cited. Many of the projects we have performed on were as an SDVOSB, with little or no requirements to meet objectives in all of the other socio-economic categories.
		RESPONSE: Please see previous responses to similar recommendations.
702	Estimating System: Section F.4.1., Page 25; Section H.6.2., Page 43; Section L.4., Section L.5.5.3., Page 76; Section L.5.5.3., Page 83 ; Section M.5., L.5.5.3., Page 95; Section J.4., Attachment (4), Section L.5.5., Question 1, Page 2	Throughout the Sections identified in Column A, the words "if applicable," "Contractors are encouraged," and "if available" are used indicating having an acceptable estimating systems is not mandatory to have. In addition, Section M.5. allows 500 points if a Contractor has an acceptable estimating system. Again indicating not a mandatory requirement. Section J.4., Attachment (4), Section L.5.5., Question 1, Page two states "(Note: If NO regarding questions 1 and 2 in this section, your offer is ineligible for award)." This is in contradiction to the requirements of the Draft RFP. Recommend this Section J, be changed to read "(Note: If NO regarding question 1 in this section, your offer is ineligible for award)."
		RESPONSE: Please see previous responses to similar questions.
703	Section H.10., Page 52	Since there is a potential of Government Property being issued to a Contractor under OASIS SB, would the Government consider : (1) adding requirements to the Draft Solicitation that Contractors are encouraged to have an acceptable Property Management System approved by the Defense Contract Management Agency? (2) adding a Maximum Point Value under Section M.5, Volume 5 - Systems, Certifications and Resources for a Contractor having an acceptable Property Management System?
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
704	Section B.3.4, Page 14 Labor outside the Continental United States (OCONUS)	Since the contract allows for OCONUS work to include work in foreign countries and territories, will the Government help secure legal status for US Citizen (cleared) contractors performing within those foreign countries.(via Technical Expert Status Accreditation (TESA) , Invited Contractor, or comparable status) on the OASIS contract at the task order level? Without such status, contractors may be required to subcontract to foreign companies licensed to perform work in those countries and may need to be required to establish a legal corporate entity in the foreign country and report foreign income and potentially pay taxes in the foreign country. For those Task Orders, suggest the Government help identify those legal implications that apply in those foreign countries the work is to be performed in and allow for reimbursement of costs associated as reasonable costs.
		RESPONSE: This would be an issue for an OCO to consider for their unique task order situation. We shall not perform any such action at the contract level.
705	Section L.4. Proposal Format (table) , Volume 4, Section Ref L.5.4.2 pg 76 Section L.5.4.1 Past Performance (No Proposal Submission), page 82 Section L.5.4.2 Past Performance (Proposal Submission, if applicable), page 82 Section J6. Attachment (6) Pages 1 – 4.	Background: We have several ID/IQ Contracts with the Federal Government entities that we have delivered multiple qualifying projects exceeding \$2M to \$5M per year values covering 3 -6 core disciplines. However some Agencies or Departments aggregate CPAR evaluations at the Contract Level and some provide CPAR evaluations at the Task Order Level. Question/Suggestion: Will the Government allow for multiple qualifying Past Performance Qualifications for task orders from a contract with only 1 annual CPAR? Recommend that the Government allow for contractors to submit multiple qualified but distinctly different task orders and that the Government use the contract CPAR for those task orders submitted for the time periods of those task orders or require the completion of the Past Performance Rating form specific for that Task Order from the Government Rater (COR and CO) to secure a specific Task Order Past Performance Rating?
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
706	Section H.6.4. Forward Pricing Rate Agreements and Approved Billing Rates, page 43 Section L.5.5. VOLUME 5 – Systems, Certifications, and Resources , pages 82 – 86. Section J.4. Attachment (4), pages 2-3 Section M.4 Scoring System, pg 95	There is no mention of requiring a DCAA approved Billing System. Will the government make this a mandatory requirement for bidders or add additional scoring criteria and point value in the M.5. Scoring System for Volume 5 – Systems, Certifications and Resources?
		RESPONSE: Thank you for the recommendation. We will take it under consideration.

707	Section M.5. SCORING SYSTEM Section L.5.3. VOLUME 3 - RELEVANT EXPERIENCE Section L.5.3.1 Page 94	As written, the criteria directs past performances be broken down into three categories for scoring, Projects exceed \$3 \$4 or \$5 Million per year in total award value, including options. This breakdown assumes a reasonably symmetric allocation of award value over the base and options. If a contractor has a situation where the award is not symmetric (e.g. base \$10M, Option 1 \$1.5M and Option 2 \$2M - assuming options here are in years), how could this PP be used and fit into the \$3M, \$4M or \$5M categories? Total award value would be \$13.5M with an annual average of \$4.5M yet the PP would not qualify to be used under the current per year awarded value restriction. Is it the intent of GSA to allow only PPs that meet the awarded per year value or can the criteria be adjusted to include the average per year value to allow for asymmetric awards over the performance periods?
		RESPONSE: Please see previous responses to similar questions.
708	Answer to Question #6, dated April 19, 2013	We understand that the Government has reservations about considering an experience project as "relevant" when it could not be performed under the OASIS or OASIS SB contract. We request that the Government re-consider the answer to Q#6 (dated April 19) provided that the percentage of professional services provided is significant. Under contracts with the primary scope being IT, there can still be a significant amount of professional services provided as ancillary to the core scope of an IT contract.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
709	L.3, Instructions, Page 75	We recommend the Government provide additional clarification re: the language: "This example applies to all Relevant Experience projects and associated Past Performance. However, for Systems, Certifications, and Resources, the proposal submission must be in the official legal bidding entities name as identified on SF 33." Please confirm or clarify our understanding that the guidance provided in this subsection refers to the task order response.
		RESPONSE: Please see previous responses to similar recommendations.
710	L.3, Instructions, Page 76	Without knowing the proposed turn around time for answering questions, it is difficult to determine if the proposed process of answering all questions in one amendment will be an effective and efficient process; we have appreciated the process implemented in the RFI Q&A, and we suggest the Government continue in the RFP phase the practice of releasing answers to questions in a rolling manner.
		RESPONSE: We intend to. We would appreciate it if potential Offerors would read the responses prior to asking duplicative questions.
711	L.4 Proposal Format, Page 77, L.5.1.4, Page 79, L.5.1.5, Page 80	The Uncompensated Overtime Policy is typically included in the Professional Employee Compensation Plan; to promote a more streamlined response, we recommend these requirements be collapsed
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
712	L.4 Proposal Format (reference L.5.3.2 and L.5.5.2), Page 77	The requirement to include scanned documents may result in one or more of the required files being too large to email. We suggest the Government provide an allowance (e.g., alternative file naming convention) in the instance that one file is too large to email and must be broken up into multiple files.
		RESPONSE: We are using electronic submission through the AAS Business Systems Portal, but we will consider the recommendation.
713	L.5.3.1, Relevant Experience Minimum Requirements, Page 85	The functional areas included in this GWAC are broad in nature and includes niche areas of work that may not be the core service provided on contracts that qualify for past performance based on size. As a result, we recommend that the value of the contracts used as past performance be lowered from \$5M/year, as stated in the dRFP, to \$2.5M/year in the final RFP.
		RESPONSE: To clarify, this is not a GWAC. Please see previous responses to similar recommendations.
714	A.1, p. 8	"...that will be used in the upcoming OASIS SB acquisitions for the unrestricted and small business contract." -- Recommend rewording in one of these two ways: "...that will be used in the upcoming OASIS acquisitions for the unrestricted and small business contract" or "...that will be used in the upcoming OASIS SB acquisition."
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
715	B.2.5.1, p13	For clarity, refer ahead to F.3, which explains the details of how a contract with a 5-year base and a 5-year option can have "Years 11 through 15." Nothing is amiss, but a reference to F.3 will be helpful for some readers.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
716	F.3, H.11.1, H.11.2, H.11.3	"period of performance term": the word "term" is redundant with "period" and may be deleted.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
717	H.6.2, p. 43	Recommend paragraph 2 be rewritten as follows (if I have interpreted correctly), using semicolons (or else a bulleted list) to distinguish the breaks in the grammar, since the listed items themselves contain commas: "An acceptable estimating system means an estimating system that: is maintained, reliable, and consistently applied; produces verifiable, supportable, documented, and timely cost estimates that form an acceptable basis for negotiation of fair and reasonable prices; is consistent with and integrated with the Contractor's related management systems; and is subject to applicable financial control systems."
		RESPONSE: Thank you for the suggested edits.

718	H.9.3, p. 51	<p>Paragraph 2: The first sentence reads thus: "Notwithstanding a potential conflict of interest, nothing prohibits an OASIS SB Prime Contractor from being a Subcontractor to another OASIS SB Prime Contractor on task orders solicited and awarded under OASIS SB."</p> <p>There are three issues:</p> <ol style="list-style-type: none"> 1) It's unclear how this sentence relates either to the rest of its paragraph, or to the paragraph before. It may be in the wrong place. 2) "Notwithstanding" means essentially "in spite of some obstacle." In this sentence, either it is used incorrectly, or it is used confusingly. It jives poorly, also, with "potential conflict of interest." A potential COI may not be an obstacle, but it's not clear whether a real COI is an obstacle or not. 3) The words "notwithstanding," "nothing," and "prohibits" cloud the sentence with negatives. Grammatically, it's a viable construction; but syntactically, it works out to something like a "triple negative," which is hard to follow. :) <p>Suggested rewrite: "Assuming no [or "Even assuming a"] real or potential conflict of interest, an OASIS Prime Contractor may be a Subcontractor to another OASIS SB Prime Contractor on task orders solicited and awarded under OASIS SB."</p> <p>RESPONSE: Thank you for the recommendation. We will take it under consideration.</p>
719	L.4, p. 76	<p>Note 1: "...size shall (12) point Arial; Margins shall..." -- change to: "...size shall be 12 point Arial; margins shall..."</p> <p>Table: Instead of blacking out the cells under the volume numbers (column 1), which creates a visually distracting effect, use the "merge cells" command to stretch the numbered cell across all the rows for that volume. (For Vol. 5, which spans two pages, it will be necessary to do this separately for each page.) Recommend also centering all content vertically within the cells, for a cleaner read (as in most cells of the table at M.4.4.1, p. 93).</p> <p>RESPONSE: Thank you for the recommendation. We will take it under consideration.</p>
720	L.5.3.1, p. 80	<p>Revise to clarify that these requirements apply individually to each contract. ("Total award value," in particular, could be misread as applying to the sum total of all five contracts.) Suggestion:</p> <ol style="list-style-type: none"> "2. Each project must involve the performance..." "3. Each project must have a total award value, including option years, of..." "4. Each project must have been completed within..." <p>RESPONSE: Thank you for the recommendation. We will take it under consideration.</p>
721	L.5.4.2.3, p. 81	<p>"In accordance the template's Paragraph C, Attach Contractual and Proposal Documents, for each of the 5 relevant experience projects in order to substantiate the information in Paragraph B, Relevant Experience Matrix." -- This is a fragment. Ending with a comma instead of a period will fix the problem.</p> <p>RESPONSE: Thank you for the recommendation. We will take it under consideration.</p>
722	L.6., p. 86	<p>For clarity, refer back to F.3, which explains the details of how a contract with a 5-year base and a 5-year option can have "Years 2 through 15."</p> <p>RESPONSE: Thank you for the recommendation. We will take it under consideration.</p>
723	Throughout: Formatting	<p>Includes color, consistent paragraph styles, and a font other than Times New Roman. Three cheers!</p> <p>One small strengthening suggestion, though: add the Section title to the header, on the left side, to orient the reader a little better. (As I'm reading H.6.10, for instance, I really don't recall what H.6 was....)</p> <p>Procedure:</p> <ol style="list-style-type: none"> 1. Double-click the header to open it into editable mode. 2. Header & Footer Tools tab > Design tab > Insert Quick Parts dropdown > "Field..." 3. Select "StyleRef" in the first list, and "Heading 1" in the second list (or whichever heading makes the most sense; it could be Heading 2 or something else.) 4. Click "Ok." 5. Put the cursor at the start of the gray title field; repeat steps 2-3, but this time check the box for "Insert paragraph # in full context"; click "Ok"; add a space between the number and the title. These two fields should update automatically to reflect the Level [X] header governing the text which starts the page. 6. Arrange and format the fields as necessary within the header. (If everything is currently right-justified, you may need to add left and right tabs: or insert a 2-column, 1-row, 6.5"-wide table with transparent gridlines, with the <p>RESPONSE: Thank you for the recommendation. We will take it under consideration.</p>
724	Section L.5.3.1, Pages 80 - 81	<p>Please explain the requirement for one project to be performed under a cost-reimbursement contract type. Many small businesses do not operate in the cost reimbursable arena. In addition, the Federal government is looking to reduce their risk, and thus, we are seeing a trend of more contracts coming out as firm fixed price. It may be difficult to find multiple small businesses that can fulfill this requirement, and provide the level of competition the government is seeking. Therefore, we recommend that the cost reimbursable requirement be removed.</p> <p>RESPONSE: Please see the changes made and previous responses to similar recommendations.</p>
725	Drft Solic. H.4.2.1. Page 40	<p>The NAISC Code Pools appear too large to support small businesses. Would GSA consider smaller pools, say at \$1.5, \$3.5, \$5.0, and \$7.5M?</p> <p>RESPONSE: The size standards associated with NAICS codes are established by SBA. We have no control over that.</p>
726	Drft Solic. H.6.14 Page 48	<p>Would the GSA consider allowing the prime to perform less than 50% of the effort, if at least 51% of the effort is performed by other small businesses on the prime's team?</p> <p>RESPONSE: The rule in effect at the time of award will dictate the answer to this question.</p>
727	Drft Solic. H.11.3. Page 55	<p>OASIS can be a 5 to 10 yr contract. Would GSA consider allowing on-ramping of new contractors on a more regular basis? A quarterly or bi-annually on-ramp process would allow more growing small businesses to take full advantage of the OASIS vehicle and would contribute more to its widespread use.</p> <p>RESPONSE: We anticipate on-ramping, but not every 3-6 months. This is not an open solicitation.</p>
728	Drft Solic. H.11.3. Page 65	<p>Would the GSA consider smaller pools that would facilitate smaller businesses, or teams of smaller businesses? Would GSA consider allowing the primes to offer services and products that are exclusively those of the subcontractor or manufactured by someone else?</p> <p>RESPONSE: No to both questions.</p>

729	Drft Solic. K.1.4. Page 68	Would the GSA consider smaller pools that would facilitate smaller businesses, or teams of smaller businesses?
		RESPONSE: No. Please see previous responses to similar recommendations.
730	Drft Solic L.3. Page 74	To support the growth and development of smaller businesses, would the GSA consider allowing prime contractors to use the Relevant Experience projects, and associated Past Performance, as well as Systems, Certifications, and Resources of the entire team. Smaller businesses may not be able to compete with CTAs that are using the capabilities of the members of the CTA.
		RESPONSE: No. Please see previous responses to similar recommendations.
731	Drft Solic L.5.1.7 Page 79	Allowing the use of current CTAs may offer an advantage over a small prime with strong subcontracting relationships. Would the GSA consider allowing primes to share the capabilities of their subcontractors to qualify under the OASIS bid?
		RESPONSE: No. Please see previous responses to similar recommendations.
732	Drft Solic L.5.3.1 Page 80	To support the growth and development of smaller businesses, would the GSA consider allowing prime contractors to use the Relevant Experience projects of the entire team. Smaller businesses may not be able to compete with current CTAs that are using the capabilities of the members of the CTA.
		RESPONSE: No. Please see previous responses to similar recommendations.
733	Drft Solic L.5.4.2 Page 82	To support the growth and development of smaller businesses, would the GSA consider allowing prime contractors to use the Past Performance of the entire team. Smaller businesses may not be able to compete with current CTAs that are using the capabilities of the members of the CTA.
		RESPONSE: No. Please see previous responses to similar recommendations.
734	Drft Solic L.5.5.6. & L.5.5.7 Page 84	To support the growth and development of smaller businesses, would the GSA consider allowing prime contractors to use the Certifications, and Resources of the entire team. Smaller businesses may not be able to compete with current CTAs that are using the capabilities of the members of the CTA.
		RESPONSE: No. Please see previous responses to similar recommendations.
735	Drft Solic M.2. Page 89	Would GSA consider smaller pools, say at \$1.5, \$3.5, \$ 5 and \$7.5M, and making a smaller number of awards in those polls, say 25 to allow the smaller businesses to be able to participate?
		RESPONSE: Please see previous responses to similar recommendations.
736	Drft Solic. I.2.. Page 57	With the smallest award pool at the \$14M level, would GSA consider adding smaller pools and also consider that all Primes and CTAs should be required to meet the Federal standards for 8a, minority, woman, veteran, service disabled veteran, HUB Zone, owned businesses and HBCU/MIs as well.
		RESPONSE: No. Please see previous responses to similar recommendations.
737	Drft Solic. K.1.4. Pages 68-71	With the smallest award pool at the \$14M level, would GSA consider adding additional, smaller pools and also consider that all Primes and CTAs should be required to meet the Federal standards for 8a, minority, woman, EDWOB, veteran, and service disabled veteran, owned businesses, as well as, HUB Zone and HBCU/MIs as well.
		RESPONSE: No. Please see previous responses to similar recommendations.
738	Drft Solic. L.5.5.6.-L.5.5.8. Page 84	To support the growth and development of smaller businesses, would the GSA consider allowing prime contractors to use the Systems, Certifications, and Resources of the entire team rather than just the prime.
		RESPONSE: No. Please see previous responses to similar recommendations.
739	Section C.2.1 Page 17	Section C.2.1 provides a listing of core disciplines. We understand that GSA does not want OASIS to be an "IT" contract, however in order to ensure OASIS is a comprehensive contract that provides total solutions to a customer requirements, we believe Information Technology Solutions should be incorporated into the overall scope of the contract. For example, when assisting a customer with business process enhancement, part of the solution may entail a new system to support the process. We believe that it's in the best interest of the Government to specifically allow this within the scope of OASIS otherwise many agency contracting specialist may preclude these services from being incorporated into individual task orders. This will provide the government a streamlined cost effective solution.
		RESPONSE: While we will take the recommendation under consideration, we are unlikely to implement it.
740	Section H.4 and K.1.2	If the Government were to add Information Technology Solutions to Section C.2.1, they may also want to consider adding a new Pool to the small business size standards. The new Pool should be defined as \$25 Million based on NAICS This addition will provide the government with additional small business concerns to address individual task order needs.
		RESPONSE: While we will take the recommendation under consideration, we are unlikely to implement it.
741	A.1.2 Page 9 Section L.5.1.7 Page 84	Section A.1.2 states: "GSA is committed to assuring that maximum practicable opportunity is provided to small, HUBZone small, small disadvantaged, women-owned, veteran-owned, and service-disabled veteran owned small business concerns to participate in the performance of this contract consistent with its efficient performance." The evaluation factors highlighted in Section M seem to contradict Section A.1.2 favoring large defense and/or Aerospace contractors.
		If the Government really wants to provide maximum opportunities for small business they should: 1) Alter Section M and provide separate evaluation criteria for small business concerns who wish to compete in the full and open contract. This would provide fair opportunity for small businesses to grow with the contract over the life of the program.
		2) Structure the contract vehicle to allow small businesses to compete for initial contract award and/or subsequent task orders under the full and open procurement. As structured, small businesses cannot effectively compete under the full and open procurement.

		3) Considering allowing small and mid-size businesses to submit proposals using Contractor Teaming Agreements (CTA)/Joint Ventures (JV) in the full and open solicitation as long as the CTA/JV is established prior to bid submission. The CTA/JV should be a legal entity registered in CCR. Copies of the CTA/JV Agreement should also be provided so the Government can understand the nature of the Agreement. Since the CTA/JV would be a legal entity, the CTA/JV would have the ability to commit all companies under the CTA/JV Agreement and provide a clear line of responsibility and accountability for the Government. By allowing small and mid-size business to form CTA/JV's and compete for the solicitation, the Government would "level the playing field" for all firms and not favor larger Federal Contractors (especially since many of them have grown via mergers and work was performed by legacy companies).
		4) Combine the full and open and small business solicitations so they are a single contract with awards within Pool classes as stipulated in Section H-4 and K.1.2. By awarding a single contract small business would be provided fair opportunity to compete for task orders. Additionally, when small business are successful and graduate (as a result of size growth or change in ownership), they still are allowed to participate in the program.
		RESPONSE: We have created an entire separate contract as a 100% Small Business Set-aside. We have put the goals for Small Business subcontracting on the OASIS contract at 50% and made meeting small business goals an important part of our evaluation on the OASIS contract. Accordingly, we disagree with your opinion and feel we have gone to great lengths in helping Small Business. With regards to your recommendation to create special considerations on the OASIS unrestricted contract for small business, in addition to having a 100% Small Business Set Aside OASIS contract, shall not be implemented. Additionally, we will not combine the two solicitations. This is based on overwhelming feedback from clients and Industry (both large and small).
742	Section L.5.5.5 Page 89 Section M.5 Page 101	Section L.5.5.5 states: "Approved Purchasing System, if available, the Offeror must provide verification from the Defense Contract Audit Agency (DCAA), or Defense Contract Management Agency (DCMA), or any Federal Civilian Audit Agency of an approved purchasing system for compliance in the efficiency and effectiveness with which the Contractor spends Government funds and compliance with Government policy when subcontracting." However Section M.5 is allotting 500 points to any contractor that does have an approved purchasing system. According to Far 44.302 a company must exceed \$25M in annual purchases in order to reach the threshold for an approved purchasing audit which in turn would mean they are no longer a small business for many categories. We recommend the government either remove or lower the point allocations identified in Section M.5 associated with approved purchasing system for small businesses.
		RESPONSE: Please see previous responses to similar recommendations.
743	L.5.5.2 Page 88 Section M.5 Page 101	Section L.5.5.3 states: Acceptable Estimating System. If available, the Offeror must provide verification from the Defense Contract Audit Agency (DCAA), or Defense Contract Management Agency (DCMA), or any Federal Civilian Audit Agency of an estimating system that has been audited and determined acceptable for budgeting and planning controls, and generating estimates of costs and other data included in proposals submitted to customers in the expectation of receiving contract awards. Verification requirements include a copy of the Offeror's official audit report and audit report number from DCAA, if available and/or official letterhead from DCAA, DCMA, or any Federal Civilian Audit Agency verifying the acceptability of the estimating system, if available. Section M.5 allots an Acceptable Estimating System 100 points. In order to make scoring more fair to small and medium size businesses (who do not normally have an audited Estimating System) we recommend the government either remove or lower the point allocations identified in Section M.5 associated with approved estimating system for small businesses. This will allow small businesses a chance to offset the point distribution and be eligible for award
		RESPONSE: Please see previous responses to similar recommendations.
744	Section L.5.1.7 Page 84	The Government's discussion relating to existing Contractor Team Agreement (CTA)/Join Ventures is a bit confusing. We believe it is in the best interest of the Government to allow Joint Ventures where Companies can form a formal legal entity to submit a bid for OASIS as long as the legal entity is formally established and operating prior to proposal submission. The JV would be the formal legal entity, be registered in CCR and ORCA, and would be the entity for which the Government has contractual authority. The JV should be allowed to submit past performance from each of its participating entities in the same manner a large company would for its various business units. Section L.5.1.7 seems to prohibit the submission of past performance and information from JVs members. We kindly request that the Government review Section L.5.1.7 and allow contractors to propose as JVs as long as the entity is established and operating prior to the bid submission date.
		RESPONSE: We respectfully disagree with your position, but thank you for the feedback. As we have stated many, many times, we are looking for proven performance, not just the promise of future performance.
745	L.3 Instructions, Page 75 and L.5.1.7, Existing CTA if applicable Page 84	Recommend allowing for the use of subcontractor teams to join with the prime in order to more fully respond to the experience requirements. We would request that you look at Prime/sub relationships, or Mentor/Protege relationships for the ability to utilize additional experience examples for a prime contractor
		RESPONSE: Please see previous responses to similar recommendations.

746	F.4.1 on page 24-25	OASIS has become a highly bureaucratic contract with an excessive amount of paperwork (for example, insurance certificates) that other agencies don't require because there is trust between the Government and the Contractors. For example, GSA is asking Contractors to provide information that is in USA Spending and CPARS, thus creating unnecessary costs. The due date for reporting changes in certifications and systems is unreasonably short. Please consider a more efficient process and limit to what is really needed.
		RESPONSE: Thank you for your feedback. Please provide specific recommendations.
747	G.2.5 on page 28 and G.2.6.2 on page 30	What is the purpose of limiting the use of contract vehicle to only CO's delegated authority from GSA? This has the potential to severely limit the use of the vehicle by non-GSA agencies, creating an extra burden for agency contractor staff. It also creates extra work for Contractors [G.2.6.2] to verified the OCO status each time. Recommend reconsideration of requirement.
		RESPONSE: The DPA process is a quality assurance step and it shall remain. GSA has done this with other contracts and it has had no detrimental effect.
748	G.2.6 on page 29	The minimum term requirement discourages competent persons from serving in the role, because it locks them out of advancement opportunities for a full year. Please provide more flexibility for substitutions.
		RESPONSE: We do not want constant turnover within Key Personnel positions. Please provide alternative suggestions if you have any.
749	G.2.6 on page 29 H.6.10 on page 46 H.7.1 on page 48	GSA has placed a number of cost sharing requirements on OASIS contractors that are contrary to the basic Government cost principle - that costs directly associated with a cost objective must be directly charged to that objective. We ask GSA to drop these violating sections: "Costs associated with the COPM and COCM shall be at no direct cost to the Government." "Facility and employee security clearances shall be at the expense of Contractors". Other agencies provide reimbursement for these costs when it is required for the scope. "Any Contractor costs associated to PMR Meetings shall be at no direct costs to the Government". How does burdening Contractors with these costs encourage a "cohesive partnership"? It appears GSA is taking advantage of the Contractor community. If a requirement is important enough to include, then the Government should be willing to pay the resulting costs. Please delete these cost burdens.
		RESPONSE: If these are unacceptable indirect costs of doing business that you don't think you can recoup through task orders won under OASIS, please refrain from proposing.
750	G.3.2.1 on page 31	Recommend that the task order award process be coordinated with USA Spending or FDPS and not be an extra bureaucratic requirement of this contract.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
751	G.3.3.1 on page 34	The small business goal of 50% is excessive. Large projects often have large out sourcing needs that can only be met by companies with large capacity and thus are not small. One instance like that, and the percentage to small business shrinks. The current goal is more than double the SBA's statutory goal for all of the Government. Plus OASIS has an entire set aside companion contract. Please consider cutting the goal in half.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
752	H.7.5 on page 50	In fairness to the requirement of winning 5 task orders in the base period, GSA should promise at least 200 RFTOPs in that period (40*5) for the unrestricted OASIS component.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
753	L.5.3.1, page 85-86	The requirement for the 5 distinct projects as a prime to have award amounts of at least \$ 5 Million per year is too high for businesses that are too large to meet the small business size standards, but do not have the volume of work to to meet this requirement. For example, businesses with annual revenues in the \$20 - 50 million range. This requirement will eliminate many of these businesses that provide high-quality professional services from bidding as a prime on this contract mechanism.
		RESPONSE: Please see the previous responses to similar recommendations.
754	H.6.6., page 45 and M.5, pages 100-101	As a business that primarily provides professional services in the areas of Program Management, Management Consulting, Scientific Services and Financial Management Services, the ISO 9001:2008 Certification is unnecessary. The scoring matrix that provides points for this certification penalizes businesses that can perform work in multiple disciplines, but do not provide services that would require this certification
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
755	H.6.7., page 45 and M.5, pages 100-101	The AS9100 Certification is recommended for businesses working in the aerospace industry. As a business that primarily provides professional services in the areas of Program Management, Management Consulting, Scientific Services and Financial Management Services in the health and human services sector, the AS9100 Certification is unnecessary. The scoring matrix that provides points for this certification penalizes businesses that can perform work in multiple disciplines, but do not provide services that would require this certification.
		RESPONSE: Please see the previous responses to similar recommendations.
756	H.6.8., page 45 and M.5, pages 100-101	As a business that primarily provides professional services in the areas of Program Management, Management Consulting, Scientific Services and Financial Management Services, with little Information Technology services, the CMMI Maturity level is unnecessary. The scoring matrix that provides points for this certification penalizes businesses that can perform work in multiple disciplines, but do not provide services that would require this certification
		RESPONSE: Please see the previous responses to similar recommendations.
757	H.6.10.1, page 46 and M.5, pages 100-101	Will Secret or Top Secret Facility Security Clearance be required on all task orders issued through this contract? If not, the scoring matrix that provides points for this clearance penalizes small businesses that do not currently have this clearance. At one point, we had Secret Facility Clearance when work we performed require it. However, that work as ended and we no longer have the Facility Clearance as you are required to have an active contract that requires the clearance to maintain it. Not having the clearance now does not mean that we would not be able to have it re-instated if the work required such a clearance.
		RESPONSE: Please see the previous responses to similar recommendations.

758	Section H, H.7.2, Page 49.	This section includes information that will be included on the GSA OASIS webpage. In regards to a Contractor's Systems, Compliances, and Certifications, will this information be on a public facing website or a Government only facing website? If it is intended to be placed on a public facing website, we recommend this information be for Government viewing only.
		RESPONSE: Please see the previous responses to similar recommendations.
759	Section I, 1.2, Page 58.	Request that FAR 52.227-17 be removed from the RFP. FAR 52.227-14 would apply (and is already incorporated by reference). It is recommended that, should FAR 52.227-17 apply to any task order for Special Works, the task order incorporate the clause so that it would apply to any sensitive or customer-specific data contained within the customer's databases.
		RESPONSE: Thank you for bringing this to our attention. We shall investigate and edit accordingly.
760	Section F, F.4.1, Pages 24-25.	It is recommended that in lieu of providing documentaton "within 3 calendar days after the update" for reporting on items identified in H.6.1 through H.6.10.1, an annual or semi-annual checklist be submitted similar to the Alliant contract's Cost Accounting Earned Value Management Sytems Checklist. Many companies will find it difficult to obtain updated information within 3 calendar days in order to report on it. If leaving in requirement for updates with a number of calendar days, recommend the calendar days be 15 calendar days.
		RESPONSE: We are editing this.
761	Section L.5.1.6. SubContracting Plan page 80	We believe that the line just prior to 1. Individual plan should read "GSA strongly encourages Offerors to submit an Individual Plan for OASIS.
		RESPONSE: Thank you for the edit.
762	Section L.6 Volue 6 - Cost/Price page 92	Recommend you consider experience equivalencies to education so that the field of available expertiese is not unnecessarily limited.
		RESPONSE: Thank you for the recommendation. We will take it under consideration.
		End of Questions.