



December 8, 2023

Andrea Ross
Senior Contracting Officer
SEWP Procurement Team Lead
NASA
300 E Street, SW
Washington, DC 20024-3210

Dear Ms. Ross,

The Coalition for Government Procurement (“the Coalition”) would like to thank the National Aeronautics and Space Administration (NASA) for the opportunity to submit comments on the SEWP VI Draft Request for Proposal (RFP).

The Coalition is a non-profit association of firms selling commercial services and products to the Federal Government. Coalition members include small, medium, and large business concerns, and collectively account for more than \$145 billion in spending through Government contracts. The Coalition is proud to have worked with Government officials for more than 40 years towards the mutual goal of common-sense acquisition.

[Release of a 2nd Draft RFP](#)

The Coalition and its member companies applaud NASA for the ongoing dialogue with industry throughout the development of the acquisition strategy for the SEWP VI contract vehicle. Given the high volume of feedback on the first draft submitted through the SEWP VI Portal, we strongly recommend that NASA issue a second draft RFP for the following reasons:

- To allow NASA the opportunity to incorporate feedback and address questions and concerns raised by prospective offerors.
- To provide potential offerors with the opportunity to better understand the contract's conditions.
- To clarify the requirements needed for bid preparation.
- To enhance competition and transparency.
- To benefit and incent participation by small business stakeholders.
- To improve the efficacy and efficiency of the SEWP VI vehicle’s overall procurement process.
- To confirm and incorporate verbal changes discussed at SEWP PMO Industry Days ahead of the final RFP.
- To pave the way to a higher quality final RFP, which would result in fewer questions and better proposals from industry.

The Coalition recognizes and appreciates the acquisition schedule NASA is pursuing, and this recommendation is not intended to delay or slow that schedule. Rather, this step could be added 2-4 weeks prior to NASA's planned RFP release date and in parallel to NASA's internal quality and/or legal reviews. If a second draft is not issued, however, we request that the SEWP PMO consider allowing and answering additional questions.

[Addition of Cost-Type Contracts](#)

The Coalition recommends that NASA add FAR 16.3 Cost Reimbursement Contracts for task order contract types permitted under SEWP VI for Categories B: Enterprise-wide IT Solutions and C: IT Professional Services (ICT and AV Services). Coalition members have noted that, in their experiences with other governmentwide acquisition contracts (GWACs), a significant percentage of the enterprise-wide market with a strong services element is awarded under a cost-reimbursement basis. We believe that this is an important option for end-user customers because it affords the government greater flexibility in contending with more complex technical requirements. Firm Fixed Price (FFP) contracts are excellent, low risk vehicles for procuring commercial IT products and services. FFP contracts can and should be applied to Category B and C acquisitions. However, some SEWP VI users may have inherently ambiguous requirements, especially concerning quantification of technical / performance outcomes for Agency-wide solutions. This ambiguity and the attendant execution risks to government and the financial risks to industry can be mitigated by offering contract type choice. Limiting these categories to price-type contracts may result in technical and financial risks for the government and awardees, while also deterring potential offerors from participating in the solicitation.

[Establishing Surcharge Cap for Enterprise Solutions](#)

The NASA SEWP surcharge of 0.34% is an excellent value for the average SEWP V order. This value, however, does not scale competitively for enterprise task orders that exceed \$100 million. The Coalition recommends that for Category B orders of more than \$50 million/year, NASA consider establishing a surcharge cap that satisfies the SEWP PMO's cost recovery objectives (e.g., \$170k/year per order, or a similar figure).

[Increasing the Ceiling](#)

The Coalition urges NASA to consider raising the ceiling from \$20 billion to \$50 billion or more due to the introduction of broader services/total solutions scope in SEWP VI. The need to raise the ceiling is supported by the increase in SEWP V awards in fiscal year 2023, which exceeded \$12 billion in total.

[Clarifying Scope to Categories](#)

The Coalition asks that NASA consider adding clarifying scope to the categories. Specifically, the addition of 'ordering scenarios' would help to distinguish between how NASA and SEWP users may be prohibited from using a certain category given its service or solutions requirements. The addition of ordering scenarios may provide clarity and address overlap found between Sections B and C.

Thank you again for your consideration of our recommendations herein response to the SEWP VI Draft RFP. In addition, comprehensive member comments have been submitted through the Portal for NASA's review. We look forward to continuing the engagement with NASA on the SEWP VI

procurement. If there are any questions, I may be reached at rwaldron@thecgp.org or (202) 315-0975.

Best regards,

A handwritten signature in black ink, appearing to read 'RWaldron', is positioned above a rectangular grey shaded area.

Roger Waldron
President

CC: Joanne Woytek, SEWP Program Director, NASA