

First glance: Breakdown of the Alliant 3 draft solicitation

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The highly anticipated and closely watched second draft of the Alliant 3 [solicitation](#) is finally here! After nearly a year since the release of the amended version of the first draft request for proposal (RFP), on December 8th, 2023, the General Services Agency (GSA) released the second draft RFP for the “Best-In-Class” (BIC) Governmentwide Acquisition Contract (GWAC).

As a continuation of flagship vehicles Alliant and Alliant 2, Alliant 3 will provide government agencies with integrated information technology (IT) solution services for evolving needs. The focus of the contract vehicle is to solicit existing and future leading-edge technologies.

There are several changes when compared to the first draft RFP – some of which address technical proposal structure, self-scoring and teaming. For more background on the initial draft RFP, Baker Tilly published an article that is available [here](#).

Key Takeaways

Contemplated number of awards

According to the second draft RFP, GSA still intends to make at least 60 awards while also considering the possibility of tied scores. In the event of a tie at the 60th award, all offerors with equal scores will receive an award. Additionally, if a tied score occurs before the 60th award, the two offerors will also receive awards.

Master Contract labor categories

The Alliant 3 Master Contract will provide for three (3) standard IT Service Labor Categories (LCATs) to enhance the consistency of labor and service cost/price offers and reporting. The three (3) LCATs are:

- Standard IT Service LCATs
- Non-Standard IT Service LCATs
- Ancillary Service LCATs

Maximum rates at the senior skill level for the 31 “Standard IT Services LCATs” will only apply to Time & Material (T&M) and Labor Hour (LH) contract type Task Orders and to any T&M and LH contract type CLINS in Task Orders with multiple contract types. Maximum Rates will not apply to any other contract types, including Cost-Reimbursement and Fixed-price Task Orders or Cost-Reimbursement and Fixed-price CLINS. Non-Standard and Ancillary LCAT pricing will be determined at the Task Order level.

Meaningful relationship commitment letters (MRCLs)

In the second draft RFP, the utilization of resources from a Parent Company, Affiliate, Division, and/or Subsidiary will only allow Offerors to take credit for scoring elements involving contractor business systems. Previously, GSA allowed offerors with an MRCL to take credit for relevant project experience, certifications, and systems. This also departs from GSA’s historic treatment of offers under other major acquisition programs like the [OASIS+ contract vehicle](#).

In addition to only allowing credit to be taken for MRCL member’s business systems, GSA will allow the Ordering Contracting Officer to have discretion to accept or reject the meaningful relationship for any resulting task order procurement(s) during the term of the Master Contract. Offerors will be required to prepare an MRCL for each affiliated entity unless the offeror is the Parent Company and the Offeror, in which case the offeror will only need to prepare one MRCL. GSA is no longer treating MRCLs on a “pass/fail” rated basis, but instead will be treated as contractual promises that will be incorporated by reference or attached to any resulting Master Contract.

Contractor teaming arrangements (CTAs)

GSA revised the language for “Existing Joint Ventures or Partnerships” to remove “partnerships” entirely from the second draft RFP. According to the updated draft RFP, “Partnerships Agreements or Partnerships are not considered a CTA since they do not have an established UEI Number or single legal entity for the Government to establish privity with a single source, and therefore is not allowed as an Offeror.”

For existing Joint Ventures (JVs), offerors will need to show proven experience and performance on all relevant experience and emerging technology projects as an existing CTA, or all members of the JV performing together exclusively, to receive the Organizational Risk Assessment credit.

Similarly, GSA also revised the language to remove “partnerships” from the alternate section for “Small Business Contractor Teaming Arrangements”. GSA now only allows Small Business CTAs to consist of small business joint ventures (new or existing) or small business prime contractor with one or more proposed small business subcontractors.

Additionally, clarity is needed from GSA on FAR Part 8 CTAs under the MAS program. Under FAR Part 8 CTAs, each member technically has privity of contract, which raises questions on whether GSA would consider a project awarded to the CTA as prime contracts for each member. Per the GSA [website](#), FAR Part 9 CTAs do not apply to the GSA schedule program. The Alliant 3 RFP provides instructions relevant to FAR 9.6 JVs and CTAs where the JV or CTA is a separate entity with its own SAM record and UEI. However, the RFP does not address FAR 8.403 MAS teaming.

“Relevant Project” experience definition

For Alliant 3 scoring, over 50% of the total maximum points derive from relevant NAICS or Emerging Technology experience projects. Previously under Section L.5.2.1 (Relevant Experience Projects), GSA included language to allow offerors to submit “any combination of Federal and Non-Federal projects”. However, that language was removed from the second draft RFP. This appears to be a clerical error by GSA as references to non-federal projects related to Relevant Experience Projects appear in several subsequent sections of the RFP. For example, Section L.5.2.2 (NAICS Group Relevant Experience) references “Federal and Commercial projects” when describing the calculation of project value for subcontractor projects. We believe commercial projects will be allowed and GSA will correct this revision in the final solicitation.

Scorecard and scoring updates

GSA made several updates to the minimum scoring requirements within the second draft RFP. Notably, GSA reduced the Project Value Size thresholds for offerors to score points for their seven (7) NAICS Relevant Projects under Section L.5.2.3.3 as follows:

- 500 points (was greater than or equal to \$35 Million but less than \$100 Million, now greater than or equal to \$7.5 Million but less than \$34.9 Million)
- 1,000 points (was greater than or equal to \$100 Million but less than \$275 Million, now greater than or equal to \$35 Million but less than \$99.99 Million)
- 1,500 points (was greater than or equal to \$275 Million, now greater than or equal to \$100 Million)

By reducing the project value size thresholds, GSA increased the competitive point scoring potential to a larger group of potential offerors. GSA also updated the scoring criteria in Section L.5.4.9 for the ISO/IEC 27001 certification to now include the ISO/IEC 27001:2022 standard in addition to the ISO/IEC 27001:2013.

According to the second draft RFP, GSA will allow for potential offerors who do not have Government approved business systems to score points for Cognizant Federal Agency (CFA) or Certified Public Accountant (CPA) approved systems. While GSA is allowing for CFA or CPA approved systems in lieu of a government approved systems, it is important to note that points scored for CFA or CPA systems are lower than points scored for a DCAA or DCMA approved system. GSA is not offering this alternative scoring on all systems, rather this new scoring alternative is only applicable to the following systems:

- Adequate Cost Accounting System
- Approve Purchasing System

- Acceptable Estimating System

It is unclear why points for CFA approval would yield less points than a DCAA or DCMA approved system. Baker Tilly believes this is likely an area ripe for revision when the final solicitation is released, so industry should be mindful of changes here.

While the maximum point total has remained relatively the same between the first draft RFP and the second draft RFP (was 94,200, now 92,200 points), several minor updates were made to the following point scoring areas:

Volume 2 – Relevant Experience
<ul style="list-style-type: none"> • Removed scoring section for “NAICS Relevant Experience Project - Fair Opportunity Task Order Award Against a MA/IDIQ Contract” (was 3,000 points, now N/A) <ul style="list-style-type: none"> ○ Note: GSA did not remove and renumber Section L.5.2.3.6, but instead left as a “Reserved” placeholder so a new scoring area could be added to the final solicitation.
Volume 4 – Systems, Certifications, And Clearances
<ul style="list-style-type: none"> • Increased points for DCMA / DCAA certified Adequate Accounting System (was 5,500 points, now 6,000 points) • Added in scoring alternative for a CFA / CPA certified Adequate Cost Accounting System (was previously not allowed, now 3,000 points) • Added in scoring alternative for a CFA / CPA certified Approved Purchasing System (was previously not allowed, now 750 points) • Added in scoring alternative for a CFA / CPA certified Acceptable Estimating System (was previously not allowed, now 200 points)
Volume 7 – Sustainability Related Disclosures
<ul style="list-style-type: none"> • Increased points for Scope 1 and Scope 2 Greenhouse Gas (GHG) Disclosure (was 1,500 points, now 1,750 points) • Increased points for Scope 3 Greenhouse Gas (GHG) Disclosure (was 1,500 points, now 1,750 points)

Below is a summary breakdown of the maximum points by Scoring Volume for the Alliant 3 Draft RFP 2:

Alliant 3 Draft RFP 2 Self Scoring Worksheet			
Section	Element	Max Point Value	Percent
L.5.2	VOLUME 2 – RELEVANT EXPERIENCE		
L.5.2.2	NAICS Relevant Experience Projects / Primary Relevant Experience Projects at \$7.5 Million Minimum Value	17,500	50%
L.5.2.3.3	NAICS Relevant Experience Project Size & Complexity	10,500	
L.5.2.3.4	NAICS Relevant Experience Project - Multiple Agency Awards	3,500	
L.5.2.3.5	NAICS Relevant Experience Project - Cost-Reimbursement	4,000	
L.5.2.3.7	NAICS Relevant Experience Project in a Foreign Location	1,500	
L.5.2.4	Emerging Technology (ET) Relevant Experience	6,600	
L.5.2.4.3	Breadth of Emerging Technology Relevant Experience	1,500	
L.5.2.4.4	Engaging Small Business w/ Emerging Technology Experience	1,000	
L.5.3	VOLUME 3 – PAST PERFORMANCE		19%
L.5.3	Past Performance for Relevant Experience Projects	17,500	
L.5.4	VOLUME 4 – SYSTEMS, CERTIFICATIONS, AND CLEARANCES		19%
L.5.4.1 - L.5.4.5	Systems	8,100	
L.5.4.6 - L.5.4.9	Industry Certifications	6,000	
L.5.4.10	Government Facility Clearances	3,500	

L.5.6	VOLUME 6 – ORGANIZATIONAL RISK ASSESSMENT		8%
L.5.6.1	Organizational Risk Assessment	7,500	
L.5.7	VOLUME 7 – SUSTAINABILITY RELATED DISCLOSURES		4%
L.5.7.1	Scope 1 and Scope 2 GHG Disclosure Completed	1,750	
L.5.7.2	Scope 3 GHG Disclosure Completed	1,750	

MAXIMUM POINTS 92,200

Contractor business systems

Each of the key contractor business systems included in the Alliant 3 second draft RFP has varying degrees of detail, trigger words with specific meaning, and acceptable forms of documentation to meet the solicitation scoring criteria. Be sure to read these sections in detail and do not paint with a broad brush for all contractor business systems. Please note, Baker Tilly will be supporting Alliant 3 offerors seeking third-party CPA review of contractor business systems.

- **Adequate Cost Accounting System:** Documentation from DCAA, DCMA, CFA, or a third-party CPA that the offerors accounting system has been audited and determined adequate is acceptable for verification.
- **Approved Purchasing System:** Documentation from DCMA, CFA, or a third-party CPA is acceptable for verification. Must provide either the CPSR Report (if available) or the official letterhead from DCMA, CFA or CPA verifying the approval of the purchasing system in accordance with the CPSR Guidebook.
- **Acceptable Estimating System:** Documentation from DCAA, DCMA, CFA, or a third-party CPA that the offerors estimating system has been audited and determined acceptable is acceptable for verification.
- **Earned Value Management System (EVMS):** Contractor must provide documentation to verify that their EVMS is compliant with Electronic Industries Alliance (EIA) Standard-748.

Cybersecurity Supply Chain Risk Management (C-SCRM) requirements

The Alliant 3 second draft RFP requires offerors to complete a C-SCRM Responsibility Assessment (Attachment J.P-11) with their proposal submission. If an offeror is awarded a contract, then **within 60 days** of contract award the contractor must complete and submit a C-SCRM Plan in accordance with the C-SCRM Plan Template (Attachment J.P-13). Interestingly, Alliant 3 has four (4) C-SCRM Maturity Levels – the first time we’ve observed such a structure articulated in such a fashion on any major GWAC/MAC program.

GSA deems an “acceptable” C-SCRM Plan as having a minimum of the 40 pre-identified NIST Controls (i.e., the Baseline level). While not required to exceed the 40 pre-identified Baseline NIST Controls, contract awardees are “encouraged” to adopt as many NIST Controls as possible to achieve a higher maturity rating level. Contractors should consider adopting as many NIST controls as possible to avoid limiting their ability to bid on Task Orders. Ordering Contracting Officers have the option to select a minimum C-SCRM Posture/Tier level when developing their Task Order requirements.

GSA is actively seeking industry input on the feasibility for offerors to meet the 40 pre-identified NIST controls via the RFI that came out with the Alliant 3 second draft RFP. Below is the summary table provided by GSA on the C-SCRM maturity levels, which can also be found in C-SCRM Control Selections (Attachment J.P-14).

TIER	MATURITY	NIST 800-161, Rev. 1 CONTROLS (see Attachment J.P-14)	TOTAL CONTROLS
1	Baseline	40 pre-identified NIST Controls	40
2	Basic	Baseline plus 57 adopted NIST Controls	97
3	Intermediate	Basic plus 41 adopted NIST Controls	138
4	Advanced	Intermediate plus 23 and above NIST Controls	161

Offerors should keep in mind that the NIST standard referenced is NIST Special Publication (SP) 800-161 – NIST’s flagship supply chain risk framework. While there is some overlap between control families in NIST SP 800-161 and NIST SP 800-171 (the foundation for DoD’s Cybersecurity Maturity Model Certification), offerors should evaluate how efforts toward CMMC could provide coverage for a NIST SP 800-161 Internal Controls gap assessment. The frameworks are different and require focused attention, especially if GSA is encouraging adherence as part of being an approved Alliant 3 vendor.

General volume items

While there were no omissions within General Volume items from the first draft RFP to the second draft RFP, there were three (3) additions:

- 1. Cybersecurity Supply Chain Risk Management (C-SCRM) Compliance Form**
 - a. C-SCRM Compliance Form attesting to their adherence of federal law and regulation governing cybersecurity supply chain risk management.
- 2. Organizational Conflict of Interest (OCI) Form**
 - a. OCI form prescribes responsibilities, general rules, and procedures for identifying, evaluating, and resolving organizational conflicts of interest.
- 3. Price Proposal**
 - a. To establish maximum ceiling rates at the Master Contract Level for the time-and-material (T&M), labor hour (LH) contract types.

GSA noted that the Price Proposal requirements are still being developed and are anticipated to change in the final RFP to include the evaluation of fully burdened rates for each of the 31 labor categories listed in Attachment J-3 at the senior skill level for T&M and LH contract types. The Government anticipates making a fair and reasonable price determination based on Total Evaluated Price and does not anticipate requiring certified cost and pricing data at the Master Contract level.

Proposal submission portal

Similar to the recent OASIS+ GWAC solicitation, GSA will utilize Symphony as the official electronic proposal submission portal. Upon release of the final solicitation, offerors are instructed to submit all questions via Symphony. Offerors should register and gain familiarity with the portal before the final solicitation is released.

Upcoming important dates/deadlines

Public comments can be submitted to GSA and must be received by January 16, 2024, at 5:00 p.m. Eastern Standard Time (EST). All comments must be submitted to A3draftRFP@gsa.gov in the formats provided in the following links:

- [Questions on Specific Areas of Interest](#)
- [General Comments by Section, Subsection](#)

The draft RFP indicates GSA does not intend to provide direct responses to public comments or suggestions. Any changes resulting from public comments will be included in the final version of the RFP. While there is no official release date for the final Alliant 3 RFP, offerors would be wise to start preparing now as GSA has hinted that they are still on track for **a final RFP release in Spring (Late April/May) 2024**. Offerors can track Alliant 3 updates via the [GSA Alliant 3 GWAC Community Interact](#) site.

How can Baker Tilly help?

With the final solicitation expected to be released in the Spring 2024, many companies are working diligently to understand the RFP requirements and how to prepare qualified, high-scoring proposals within the allotted timeframe. Timely, accurate and responsive proposals will be critical to moving through the phased evaluation process set forth by GSA in the RFP.

Baker Tilly stands ready to assist in the following areas:

- Third party review/validation of RFP specified business systems
- Scorecard/RFP readiness
- Proposal support and preparation
- Proposal compliance assessment

- Cybersecurity Supply Chain Risk Management (C-SCRM) Plan Development

Baker Tilly has a well-established methodology for third party review of business systems. Our reports have been included in client proposals as evidence of client system acceptability for many years. We are business system specialists.

Baker Tilly is familiar with the self-scoring methodology employed for complex GWAC vehicles like Alliant 2, HCaTS, ASTRO, CIO-SP4, OASIS, and OASIS+. These types of acquisitions place maximum burden on the offeror to prove that they have the requisite experience and capabilities to meet government requirements.

Baker Tilly has assisted leading government contractors through the relevant experience review process, facilitating the successful selection of the right combination of projects to achieve an organization's maximum score. Baker Tilly has also advised during the pre-proposal stage on teaming and partnering arrangements should it appear an offeror's ability to achieve a successful award is in doubt. Whether an offeror is seeking support in making a bid/no-bid decision or would like assistance with 'soup-to-nuts' proposal preparation, we offer tailor-made assistance to address your unique needs.