



January 31, 2025

Stacy Watson
Enterprise Solutions Division Director
U.S. Army PEO EIS
Department of the Army
HQ CECOM Contracting Center 6565 Surveillance Loop
Aberdeen Proving Ground, MD

Dear Ms. Watson,

On behalf of our small, medium, and larger information technology member firms, The Coalition for Common Sense in Government Procurement (the Coalition) is providing additional feedback regarding the Department of the Army's (Army) acquisition strategy concerning the draft Marketplace for the Acquisition of Professional Services (MAPS) Request for Proposal (RFP). The Army's MAPS RFP is intended to be the Army's default multiple-award contract (MAC) for the acquisition of professional and information technology services.

By way of background, the Coalition is a non-profit association of firms selling commercial services and products to the Federal Government. Its members collectively account for a significant percentage of the sales generated through General Services Administration (GSA) contracts, including the Multiple Award Schedule (MAS) program. Coalition members also are responsible for many of the commercial item solutions purchased annually by the Federal Government. These members include small, medium, and large business concerns. The Coalition is proud to have collaborated with Government officials for 45 years in promoting the mutual goal of common-sense acquisition.

The Coalition appreciates the Army's engagement and willingness to consider comments on the draft RFP. Our members' primary consensus concern relates to the Army's acquisition strategy to make 100 awards in total, 20 awards in 5 domains with an unknown number of small business "reserves" in each domain. The unintended consequences of the current strategy will likely lead to increased complexity at the order level, impacting customer agency support, and limiting small business opportunities. Moreover, the acquisition strategy ignores the highly successful dual contract vehicle structure that has been utilized by GSA and other agencies to establish MACs for professional services.

As an example, in 2013, GSA launched the One Acquisition Solution for Integrated Services (OASIS) program with the goal of establishing two separate contract vehicles, small (OASIS SB) and other-than-small business (OASIS), for complex, integrated professional services. The program's outstanding performance over the last six years has made it a strategic procurement tool in meeting customer agency mission needs. The OASIS contracts accounted for \$30 billion in customer agency mission support, with over \$10 billion of acquisitions in 2020 alone. Today, OASIS SB and OASIS stand as the most successful government-wide contracting programs for complex, integrated professional services.

The OASIS dual contract construct has yielded a pool of highly capable contractors, delivering best value mission support to customer agencies. The creation of two contract vehicles has streamlined decision-making regarding small business opportunities and meeting overall small business goals. OASIS SB enhances acquisition planning and reduces administrative barriers regarding setting aside task orders, thereby reducing costs and complexity for both customer agencies and small business contractors. The establishment of a separate, standalone contract for small businesses is more than a powerful market and policy statement demonstrating GSA's and the Federal Government's commitment to small business opportunities. It is a model of administrative efficiency, establishing up front a small business channel into which agencies can identify and feed their targeted small business orders, allowing those firms to identify and compete for business with ease. Indeed, the OASIS SB contract vehicle, as currently structured, is consistent with and supports the statutory goal of maximizing small business opportunities.

In addition, in light of recent Small Business Administration (SBA) and Federal Acquisition Regulation proposed rules directing agencies to apply the rule of two to orders, the Army's strategy will result in no, or extremely limited, small business competition in each domain. Moreover, SBA's recent recertification rule changes with respect to mergers and acquisitions could leave the Army without any small businesses in any domain. Finally, the small businesses in each domain may waste significant resources attempting to compete for unrestricted orders in their domains.

Ultimately, the dual contract structure better supports customer agencies, promotes competition, and enhances access for small, medium, and large businesses, creating a more effective approach that benefits everyone. Based on the foregoing, we urge the Army to reconsider its current small business "reserve" approach, in favor of dual unrestricted and small business set-aside MACs. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Roger D. Waldron". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Roger D. Waldron
President