



May 15, 2020

Brian Goodger
Associate Director, Office of Logistics and Acquisition Operations
National Institute of Health
9000 Rockville Pike
Bethesda, MD 20892

Dear Mr. Goodger,

The Coalition for Government Procurement appreciates the opportunity to submit member feedback on the draft RFP for CIO-SP4. The engagements with NITAAC have been productive, and we look forward to the publication of a draft scorecard for the RFP and continuing the dialogue to help develop a best-in-class contract that meets the needs of agency buyers.

As you are aware, 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 \$115 billion in spending through Government contracts, including more than 81 percent of the total sales on CIO-SP3. The Coalition is proud to have worked with Government officials for more than 40 years towards the mutual goal of common-sense acquisition.

The Coalition's comments focus on three areas:

- The contract structure of CIO-SP4, which will include both small businesses and other than small businesses,
- The self-scoring evaluation criteria,
- Feedback and questions from Coalition members on the draft RFP.

The Coalition appreciates NITAAC's consideration of this feedback and looks forward to continuing the dialogue on CIO-SP4.

CIO-SP4 Contract Structure

The draft RFP for CIO-SP4 would establish a single contract vehicle that will include both small businesses and other than small businesses. The draft RFP would combine CIO-SP3 and CIO-SP3 Small Business. NITAAC has noted that the combined contract will create more visibility for small businesses, help improve competition, and be easier for the Government to administer. This approach is a departure from the current program structure consisting of two contract vehicles, one set-aside for small business and open to other than small businesses.

Coalition members, including both small and other than small businesses, are concerned that the unintended consequences of this new structure will be to reduce opportunities for small businesses by increasing the complexity of the initial evaluation of proposals and the

subsequent management and competition for task orders. The increased complexity will likely impact the overall customer interest and demand for CIO-SP4, reducing opportunities to deliver the best value IT services that CIO-SP3 has become known for delivering to customer agencies.

Separate Contract Vehicles Enhance Support for Small Businesses

Coalition members are concerned that the unintended consequence of combining the small business and other than small business contracts into a single vehicle will be a reduction of opportunities for small business. For example, under the CIO-SP3's separate contract vehicle structure, small business accounted for more than 30 percent of spending over the life of the program. In contrast, on the Army's R2-3G and RS3 contracts, where small and other than small were combined on a single contract vehicle, overall spending with small businesses accounted for approximately 23 percent of total dollar volume. As such, small business Coalition members remain concerned that the new contract structure could unintentionally hurt their ability to compete in the market. Further, the administrative complexity of a combined contract could also spill over and potentially impact overall customer agency opportunities coming to the program.

The dual contract vehicle approach (one small contract vehicle and one other than small) simplifies acquisition planning, task order competition, and contract administration. It provides focused pools of similar contractors offering competing services. The decision to set-aside is reflected in the decision on which contract vehicle to use rather than at the time the task order is issued. As a result, acquisition planning is streamlined.

Further, creating separate contract eco-systems for small and other than small businesses allows greater flexibility at the task order level and tailoring of key contract terms. It will also reduce the underlying complexity of the contract by clearly limiting terms to those specific to only those applicable to the appropriate size business. In sum, separate contract vehicles will enhance opportunities for small business by simplifying the acquisition planning process and task order competition and execution.

Complexity of the Evaluation Process under a Single Contract

Based on the draft RFP, it appears that the evaluation of small business will be conducted by comparing small business offers against other small business offers for CIO-SP4 under the single contract vehicle approach. The combined evaluation using different criteria under a single solicitation will increase the complexity and risk associated with the proposal evaluation process. Coalition members are concerned that this increased complexity increases the potential for delays in the procurement process. Delays could impact customer agency interest in the vehicle.

In sum, combining CIO-SP3 and CIO-SP3 Small Business into a single contract vehicle is a landmark change in the program. The significant change in structure, accompanied by the increased complexity in proposal evaluation and task order management will likely have the unintended consequence of diluting the best value "brand" established by CIO-SP3 Small Business and CIO-SP3 and lead agency buyers to select another vehicle.

Self-Scoring

Section M of the draft RFP contemplates a two-phase evaluation. First, a go/no-go phase which will include the self-scoring, followed by a traditional evaluation phase including price and non-price factors. Coalition members support NITAAC's decision to utilize a self-scoring methodology for CIO-SP4. We look forward to release of a draft scorecard in the coming months, which is essential to ensure the scoring is fair and effective.

Traditional and Scoring Methodologies

Coalition members have raised concerns that the contract includes both the scorecard evaluation in addition to the non-price evaluation factors in second phase of evaluation. The unintended consequence of this approach will be to increase the complexity and potential overlap of evaluation factors and scoring. Typically, Coalition members report that in the interests of consistency and simplicity in the evaluation process, agencies pick one or the other approach and do not combine the two evaluation methodologies. Here NIH risks scorecard and narrative evaluation overlap. The use of both a scorecard and a traditional evaluation will have the unintended consequence of creating a significantly higher burden for the Government's proposal evaluation and industry's proposal preparation compared to a contract that exclusively uses either methodology.

The Coalition recommends that NITAAC remove the non-price evaluation factors from the second phase of evaluations.

Draft Scorecard

The Coalition commends the decision to release a draft scorecard prior to the release of the final RFP. Coalition members look forward to engaging with NITAAC once the draft has been published.

Additional Feedback and Questions

We have attached additional feedback and questions from Coalition members for consideration on the draft RFP. The Coalition appreciates NITAAC's engagement with industry and openness to feedback. If you need additional information or would like to discuss this feedback further, please feel free to contact me at RWaldron@thecgp.org.

Sincerely,



Roger Waldron
President

Question	Page	Section	Question
1		General	Can NITAAC elaborate on the decision to utilize one contract vehicle, rather than separate small and other than small vehicles?
2		General	Can NITAAC release a second draft RFP for industry? Additionally, gathering the back-up documentation for a self-scoring sheet is a labor intensive and time-consuming effort for offerors. Would the government consider issuing a draft self-scoring sheet soon in order to get specific industry feedback in time before issuing the final? This will give vendors the understanding and the time they need to make rational bid/no-bid decisions, teaming plans, and to gather back-up documentation.
3		General	Would the government consider removing written content in consideration of an "All Self Scoring" proposal response? Including both a traditional written evaluation and a self-scoring evaluation significantly increases the burden for industry and raises concerns about protests.
4		General	What non-price factors will be included in the scorecard?
5		General	Will the scoring model be based on narrative write-ups or contractual documents (ex. award documents with scoring elements highlighted)?
6		General	Will NITAAC consider one-on-one live feedback sessions with vendors about the draft RFP? Private discussions might benefit the RFP. Given the number of interested vendors, NITAAC could limit participation based on a lottery or some other mechanism to limit the discussions to a manageable number. Alternatively, could NITAAC consider hosting a formal industry day with interested vendors to discuss these issues?
7		General	Will NITAAC consider making explicit allowance for non-labor category IT services (<i>Managed Services, units of cloud purchases</i>) in order to keep CIO-SP4 relevant over the life of the contract?
8		General	Is teaming allowed on CIO SP4? If it is allowed, can references, experience or past performance be submitted from a team member? Can teams be formed to bid on CIO SP4? Can joint ventures be formed to bid on CIO SP4?
9		General	Will NITAAC address their position regarding mergers and acquisitions of an existing CIO-SP4 contract holder by a subsequent CIO-SP4 contract holder?
10		General	Will all CIO-SP4 primes be allowed to bid on unrestricted solicitations and will all the socio-economic categories be allowed to bid on total small business solicitations, similar to how the CMS SPARC IDIQ works? If this is not the case, what are the proposed tracks/categories/lanes that awardees will have to stay in?
11		General	How many Past Performance will be allowed for each sub-contractor being proposed as members of a team?
12		General	Will NITAAC allow for third party reviews of Business Systems to satisfy the related point-scoring requirements found in the solicitation?
13	3	B.1	Can orders issued the last day have option periods themselves, meaning that if a KO cuts a 1-year base TO on the last day of CIO-SP4, can they execute the option a year later on their TO even though CIO-SP4 has since expired?

14	4	B.4.1 Rate Refresher/H.1 Labor Categories	The provisions associated with the renewal of the rates (B.4.1 Rate Refresher) and the labor categories themselves (H.1 Labor Categories) of the CIO-SP4 rate schedule are similar to the language in CIO-SP3. This could lead to a static labor category structure and rate schedule over the 10-year life despite dramatic changes to the IT services marketplace. To facilitate customer agency access to these changing market capabilities, could CIO- SP4 include a mechanism for updating the labor categories and rates on contract at regular intervals?
15	4	B.5	Clarify what is meant by "the remainder of the ten-year PoP of the original GWAC awards". Is this PoP the authorization for GWACs themselves?
16	5	B.7	The labor tables include many positions for which there appear to be no levels (e.g., 0001 AE00 Biostatistiaian is a single qualification, but 0001 AF01-AF03 include three levels for Business Analyst). Would the government consider updating this table to include labor category levels for ALL positions to better-represent career paths/growth?
17	5	B.7	Would the government consider adding a Tier IV (4) to accommodate labor for a firm's most senior experts (PhD, MD, Fellow, Professors, multiple degrees/multiple fields, etc.)
18	5	B.7	Would the government consider adding separate labor categories in support of cloud computing (Cloud Architect, Cloud Engineer, Cloud Administrator, etc.)? Task Area 8 is specific to cloud computing, and separate LCATs should reflect market conditions and the unique qualifications and disciplines reflected in cloud work
19	15	B.8(d)	Does NITAAC anticipate requiring specific small-business goal minimums on large-business CIO-SP4?
20	18	C.2	Is a NITAAC review performed on each TOR for scope completeness or accuracy?
21	20	C.2.4	Does NITAAC anticipate TORs that could require managed services under the scope of outsourcing, where no explicit labor costs are required but are delivered as part of the service itself? Would offerors to such TORs be required to build up their labor costs from CIO-SP4 rates, their commercial rates, or other guidance?
22	25	C.3	What is the intent of a Security Plan at the IDIQ level, given that TO issued under CIO-SP4 may be wildly different in underlying security and/or security plan requirements?
23	30	F.2, F.2.1	For the development of the price schedule labor rates, will the Government provide the estimated start date for Year 1?
24	31	G.3.2 Contractor Personnel - Key Personnel	Since the Contracts Manager is listed as key personnel, what are the official duties of the Contracts Manager?
25	33	G.5.1.c	Would the government clarify whether the primary point of contact for the eGOS may/should/should not/must be the offeror's designated Contract Program Manager or Contractor Contracts Manager key personnel?
26	37	G.5.4 Service Contract Act	As the "preponderance of the GWAC's labor categories are considered bona fide executive, administrative....and generally exempt from the Service Contract Act (SCA)", in the event SCA labor categories are to be used at the task order, will NITAAC clarify NTE percentage of SCA labor to be used at the IDIQ level?

27	38	Article G.6 NIH Contract Access Fee and Fee Remittance	Will NITAAC please clarify if the NIH Contract Access Fee (NCAF) will be the same fixed percentage for both CIO-SP4 unrestricted and small business contract holders?
28	120	L.1.2	L.1.2.d.1 (below) implies offerors are to mark the cover sheet (meaning cover letter). Please clarify if this is intended. In addition, the Offeror must mark each page of data it wishes to restrict with the following statement: "Use or disclosure of data contained on this page is subject to the restriction on the cover sheet of this proposal or quotation."
29	124	L.1.2.e(4)	Contract Award. Please clarify, is there a predetermined, maximum number of proposals the Government plans to evaluate? Also, if not all proposals will be evaluated, then how will the Government determine "the most highly rated proposals"/which proposals will be evaluated?
30	128	L.2.12.a) Organization and Page Limitations and L.3.1 Section 1 (General)	The two (2) referenced sections have differences in the order of material submission. Can NITAAC clarify the desired order of material submission?
31	129	L.2.12 a)1)(a)	The draft RFP says, "Self-Scoring Sheet - (pricing is provided expansion is not allowed). " How does pricing relate to the score sheet?
32	129	L.2.12(a)(5)	Will the government clarify whether Past Performances are to be solely experience in managing IDIQ vehicles similar in size/scope to CIO-SP4 anticipated values, solely TO issues under such type vehicles, or some combination thereof?
33	129	L.2.12(a)(5)	Please clarify the reference to L.3.4(b). Should instead refer to L.3.4(3)(2)(b) which addresses certificates, awards, etc. which should be outside page count?
34	131	L.3.1 (General) b)	NITAAC states that beyond the scoring sheets " [n]o other documentation will be required." Where should offerors include the documentation that verifies the claims made on the score-sheet?
35	131	L.3.1 (General) b)	What type of documentation verifying the claims made on the score-sheet will be considered acceptable for verification purposes?
36	131	L.3.1 (General) f) Contracting Team Arrangements	Will NITAAC consider addressing in the RFP the CIO-SP4 status of a CTA where the 'leading firm' is acquired by "other than small" business?
37	131	L.3.1 (General) f) Contracting Team Arrangements	Will NITAAC address the CIO-SP4 status of a firm SB CTA member that graduates SB status during the life of the GWAC?
38	131	L.3.1 (General) f) Contracting Team Arrangements	Will NITAAC address the CIO-SP4 status of a firm CTA member that is acquired by an "other than small" business during the life of the GWAC?

39	132	L.3.1 (General) f) Contracting Team Arrangements	Will NITAAC address the CIO-SP4 status of a firm CTA member that goes out of business during the life of the GWAC?
40	133	L.3.1 (General) f) Contracting Team Arrangements	Is prior performance as a CTA a requirement for bidding CIO-SP4 as a CTA?
41	134	L.3.1.f, a) Individual SB Subcontracting Plan	In reference to the "Individual Small Business Subcontracting Plan (Required for Other than Small Business Offerors)," can the Government provide the minimum small business goals (as a percentage of total subcontracted dollars) that offerors must commit to?
42	134	L.3.1.f, a) Individual SB Subcontracting Plan	Why is the Individual Small Business Subcontracting Plan addressed in the draft RFP under the CTA section? Does this requirement only apply to offerors proposing as a CTA?
43	134	L.3.1.f, a) Individual SB Subcontracting Plan	Under what criteria will the Government evaluate the Individual Small Business Subcontracting Plan?
44	138	L.3.3 Section 3 - Factor 2 Relevant Corporate Experience	NITAAC is allowing for private sector experience. What standard documents will be used to verify experience claimed? This could present problems with evaluations
45	138	L.3.4 Section 4 - Factor 3 2)1)b	Item b states to "Identify Contract Administrators to effectively and efficiently administer the GWAC with a focus on quality;" Should this be "Contracts Manager"? What are the required items that should be submitted to meet this item?
46	138	L.3.4.1, Subfactor 1 - Domain- Specific Capability in a Health-Related Mission	Please clarify whether Factor 3, Subfactor 1 (Domain-Specific Capability in a Health-Related Mission), is a Go/No-Go Requirement (Phase 1 evaluation) or part of Phase 2 of the evaluation.
47	139	L.3.4(3)	Please clarify whether a Program Management Plan to include organization chart beyond the required PM and Contracts Manager at the IDIQ level? Will the government provide a template or draft to be completed and submitted?
48	140	L.3.5 Section 5 - Factor 4 (Past Performance)	There is no timeframe referenced in L.3.5 as to past performances being active to be allowed for use as a reference. Section M, pg. 152, c. states that "only past performance data regarding IT efforts completed within the last three years, or work that is on-going, will be evaluated." Is the specified timeframe these references must be active within the last 5 years?
49	140	L.3.5 Section 5 - Factor 4 (Past Performance)	Please verify that only a total of three past performances are to be used cumulatively to cover all 10 task areas?
50	140	L.3.5 Section 5 - Factor 4 (Past Performance)	As many of our customers comply with the mandated Contractor Performance Assessment Reporting System (CPARS) regulations and have submitted their contract performance evaluations to the system, they do

			not feel they should be required to fill out an additional survey or questionnaire. In appreciation of their compliance and very busy schedules, and in that the evaluation question areas are basically the same ones as in CPARS, may we submit a copy of their most recent CPARS/PPIRS evaluation in place of the J.4 Customer Survey Questionnaire?
51	140	L.3.5 Section 5 - Factor 4 (Past Performance)	Will the J.4 Questionnaire form be automatically populated with the information from the on-line submitted J.3 form to save the client's time looking up and entering the same information?
52	140	L.3.5 Section 5 - Factor 4 (Past Performance)	How will the offeror be able to view whether the J.4 Questionnaires have been completed/submitted by the clients?
53	143	M.1.1 Source Selection Process	We see reference to multiple Evaluation Methodologies in the Draft Solicitation including Best Value and Highest Rated Technical with Fair and Reasonable Pricing. Based on the information provided we assume the Go/ No Go will be treated as a Pass/Fail requirement in Phase One that will eliminate bidders and a Scoring Model in Phase 2 that will allow NITAAC to rank the bidders and determine a threshold score for award. Please confirm if this is accurate and if there are any additional variations of the Phased and Scoring approach that could be included in the Solicitation.
54	144	M.1.1, (g) and L.2.4 Rejection of Multiple or Alternate Offers	Regarding the statement: "g. Multiple or alternate offers from the same Prime Contractor constitutes a material nonconformity and may result in all of its offers being rejected." Please confirm that a company may submit an offer as a prime contractor for an Other Than Small Business award, while also competing as a member of a Joint Venture that will serve as the prime contractor for a Small Business award.
55	145	M.2.a Phase 1: Go/No-Go Requirements	Are there Go/No-Go Requirements beyond Self-Scoring Sheet and Required Documents (only adequate cost accounting system is listed)?
56	146	M.2 Phase 1: Go/No-Go Requirements 1)	Since the government has labeled the self-scoring sheet as a go/no-go requirement, will the government explain how many "top proposals" of each business category (OTSB, SB, 8(a), etc.) will be accepted?
57	146	M.2 Phase 1: Go/No-Go Requirements 1)	Two great benefits to the government of purely self-scoring sheet proposals are protection against successful protest and easier evaluation of a large number of proposals. The inclusion of subjective evaluation criteria diminishes the first advantage, especially considering that the subjective criteria include many of the criteria usually used to build out the objective scoring criteria. Would the government consider the following alternatives? a) Dropping the subjective portion of the evaluation putting scores on what is to be subjectively evaluated according to the current draft? b) issuing a draft scorecard for industry comment? c) Dropping the self-scoring sheet from the solicitation?
58	147	M.3, b, Phase 2: Non-Price Factors Evaluation Criteria	Table 20 indicates that the Technical Factor will be rated "based on the offeror's performance record..., Sources of information are consistently firm in stating that the Offeror's performance was ...". What will be used as the source for the "performance record" or "sources of information" for the information provided in the Technical Section since only "examples of

			experience" are to be submitted in that section and not client POC information or contract numbers?
59	148	M.3.1(d)(1)	Is Subfactor 1 evaluation intended to be a go/no-go criteria as defined in M.2? If so, to what level is the evaluation performed in both Phase 1 and Phase 2?
60	150	M.2 Phase 1: Go/No-Go Requirements 1)	The draft solicitation says, "During Phase 1, the Government will evaluate proposals using the following four (4) Go/No-Go Requirements:" but only lists two the self-scoring sheet and go/ no go requirements. Can the government clarify that these are the only two go/ no go requirements?
61	150	M.2 Phase 1: Go/No-Go Requirements 1)	For the self-scoring sheet can the government confirm that this will only be relevant to the go/ no go requirements in phase 1?
62	150	M.3.2, Factor 2 - Corporate Experience	There are no evaluation factors shown for this Section. Can you please provide the evaluation factors and if there are any factors that would be viewed/rated more favorably than others?
63	153	M.4 Phase 2 - Factor 5 Price Evaluation	Paragraph M.4.1.a.2) states that the Government may determine reasonableness through the "Comparison of proposed loaded hourly labor rates against an independent Government price estimate." Would the Government please elaborate on specifics of how price will be evaluated?
64	153	M.4.1a	Factor 5 Price Evaluation. This section references Section B. Are Offerors required to complete Section B in their proposal submission? If yes, does it go in Section 6 - Factor 5 (Price), and is it excluded from the page count? Will the Government be providing an editable Section B for Offerors to complete?
65	154	M.7	Will the government provide the list of technical/management advisory firms so as to avoid OCI issues related to this acquisition and firms (and their subsidiaries) which are precluded from bidding or participating on teams?
66	155	M.3.3 Factor 3 - Management Approach 2)a)	Item (a) states "Offerors that propose Contract Administrators with proven expertise in applying the FAR when administering contracts similar to CIO-SP3 Small Business will be evaluated more favorably." Should this be Contracts Manager?

Comment	Page	Section	Comment
1		General	It is recommended that early notice be given to industry on the use of beta.sam.gov rather than FPDS.gov for contract verification data. The FPDS system and data are moving fully to beta.sam.gov in May 2020. There may be companies that are unfamiliar with this system transfer, the familiarity with using beta.sam.gov, and the resulting differences in the data output.
2		General	Please consider creating flexibility around the requirement for experience in all task areas. For example, research & development non-profits and mid-tier companies are considered other than small businesses and would provide benefit to CIO-SP4 customers, but these firms may only have experience for a subset of task areas. As an alternative, please consider a carve out for these types of firms and allow them to apply under a subset of task areas rather than nine required for other than small businesses.
3		General	<p>We recommend that the scoring methodology follow an approach similar to other GWACs, and OASIS. These self-score methodologies include allowing points to be scored for categories such as size of workforce, number of offices, number of different government customers, security clearances held by the company, CMMI certifications, etc. We would also recommend that NITAAC provide numerous opportunities to score points under each task area, with a maximum allowed for each, similar to how the Securities and Exchange Commission (SEC) conducted their SEC OneIT evaluation.</p> <p>For example, NITAAC could include 8 specifics type of corporate experience, each worth 100 points each, under Task Area 1. However, offerors would only be able to score a maximum of 600 points under that Task. This encourages offerors that have a majority of the necessary experience to propose, while ensuring that the requirements are not so restrictive that only companies who can address every single area submit a response. Furthermore, this takes into consideration the intent of the government's objectives, without requiring that very specific language be represented in the Statements of Work we are using to self-score. Finally, this also discourages offerors from "stretching" the definitions of their work to meet overly specific or narrow requirements.</p>
4		General	For a single contract construct, we recommend the government consider providing awardees with guidance and clarity on how set-aside decisions will be made.
5	3	B.4(b)	Recommend clarifying that TOs are based on individual task order-level SOW and not just the work described in Section C.
6	31	G.3.2	Recommend removal of Key personnel email address domain name shall align with the contractor legal business name. Industry does not operate that way as a best practice
7	38	G.6 NIH Contract Access Fee and Fee Remittance	Item d states that NCAF will be invoiced in full on the first invoice based on the obligated amount. Customers in the past have expressed disinterest in using this vehicle, because of this term. We recommend NIH charge NCAF on each invoice, which will result in the customer only paying NCAF on invoiced and paid funding.

8	38	G.6 NIH Contract Access Fee and Fee Remittance	Item e states that NCAF payments are due on or before the 10th calendar day of each month for all payments received in the previous month. We strongly recommend that NITAAC consider changing the remittance from monthly to quarterly to have parity with other vehicles with similar fees. There is a benefit to CIO-SP4 to be consistent with other vehicles since government customers and contractors have choices as to which vehicles to use and may have a preference towards those vehicles that are less administratively burdensome.
9	41	G.10	Meetings or Conference - At a minimum, Contractor Program Managers are required to attend these meetings. Recommend NITAAC allow for a designee/substitute for the PM when the PM is not available
10	120	L.1.1	Where should Electronic Funds Transfer Information be included in the proposal?
11	122	L.1.2.b(3)ii(B)	Submission, Modification of Proposals. We recommend the Government remove this paragraph, as it seems to allow any Offeror to modify their proposal after the specified due date/time in the solicitation. If the paragraph remains, please clarify, does the proposal modification have to be solicited by the Government, or can any Offeror submit a proposal modification at any time (even past the solicitation due date)?
12	129	L.2.12 Section 4 General	Since this section addresses evidence of successful performance towards an EVMS - it should not be a scored item for the self-scoring sheet in Section 1 - General, on this page.
13	129	L.2.12, a), 5) Section 5 - Past Performance	Instructions say to refer to L.3.4(b) - this is the Management Approach section - what is the correct location / information referred to?
14	129	L.2.12 Organizational and Page Limitations	Ten pages are inadequate for the required content to be addressed. It is recommended that the Government increase the page count for the Management Approach Section to 20 pages.
15	130	L.2.12 Organizational and Page Limitations	Would the government please clarify the use of 11x17 pages (typically fold-outs in paper format) for CIO-SP4 submissions, guidance on their use (engineering or technical drawings, process flows, not for excessive text to otherwise exceed page count, etc.), and their effect (if any) on page count/limitations?

			<p>The draft solicitation addresses the use of CTA's however it doesn't consider resources that are shared within a corporate structure. Many offeror's will be excluded from competing for this GWAC due to these resources not being in the Offeror's name. In order to get the best competition, we recommend, NIH incorporate Meaningful Relationship Commitment Letters. Draft language is as follows:</p> <p>Meaningful Relationship Commitment Letters, if applicable: For purposes of the evaluation, proposed Meaningful Relationship Commitment Letters submitted is treated on a pass/fail rated basis and as an offer factor that will result in contractual promises that will be incorporated by reference or attached into any resulting Master Contract. Within a corporate structure, an Offeror may utilize resources from a Parent Company, Affiliate, Division, and/or Subsidiary. GSA will allow an Offeror to take credit for any evaluation element, including relevant experience project(s), system(s), or certification(s) from a Parent Company, Affiliate, Division, and/or Subsidiary so long as there is a meaningful relationship to the Offeror and commitment letters are provided to the Government. Additionally, the Government considers that any Meaningful Relationships committed in the Offeror's proposal to be used for evaluation purposes shall continue and be incorporated to the Master Contract, and made available to the Offeror for any resulting Task Order procurements during the term of any resulting Master Contract.</p>
16	131	L.3 Contents f)	This language is consistent with other GWAC BIC Acquisition RFPs.
17	131	L.3 Contents f)	Use of CTA. The paragraph implies that capabilities offered by team members or partners can only be evaluated as part of the overall prime offeror's CIO-SP4 submission if those teammates are under a formal disclosed CTA. Please clarify.
18	132	L.3.1(1)	First sentence seems misplaced. Please clarify its purpose to this section.
19	134	L.3.1.f, a) Individual Small Business Subcontracting Plan	In reference to the "Individual Small Business Subcontracting Plan (Required for Other than Small Business Offerors)," it is recommended that the Government provide the minimum small business goals (as a percentage of total subcontracted dollars) that Other than Small Business Offerors must commit to. We recommend retaining the current CIO-SP3 goal percentages, including for all the socioeconomic categories.
20	135	L.2.12.a.2 Technical Proposal submission	Technical Proposal submission - we suggest that NITAAC revise this requirement to a mandatory task area (1) and potentially the Cyber Area (7) with an Additional Task Area to be chosen by offeror. The depth of past performance criteria, which is 10 pages per area will provide evidence of ability to perform for the balance of the technical task areas.
21	135	L.3.1 Section 1 (General), d) Verification of an Adequate Accounting System	In evaluating offerors' verification/evidence of having an adequate (approved/audited) cost accounting system (CAS), it is recommended that the Government should not accept DCAA Incurred Cost Proposal (ICP) Letters.
22	138	L.3.4 Factor 3, Subfactor 1	Given the importance of DoD as a client for CIO-SP3, would the Government consider making subfactor 1 optional?
23	138	L.3.4 Factor 3, Subfactor 1	Can subfactor 1 be broadened to include decision support and data analytics?

24	139	L.3.4 Factor 3, Subfactor 3, 2)b.	Offerors quality control process should also include self-scoring points in Section1 General for the following certifications around quality; IT Service Management - ISO 20000, Information Security Management - ISO 27001, Quality Management System, ISO 9001.
25	140	L.3.5 Factor 4 Past Performance	Instruction for large vendors might require up to 30 past performance references at 5 pages per would be a past performance write up of over 150 pages. We suggest that NITAAC re-evaluate to a single Best Match 5-page past performance write up requirement as well as a list of contract numbers/relevance to be used for evaluation through other government past performance databases. This approach will provide NITAAC a more focused evaluation of past performance while also getting an assessment of capability.
26	140	L.3.5 Factor 4 Past Performance	Please clarify or explain the statement - Offerors that do not have past performance overall all proposal score will not be negatively impacted
27	141	L.3.6(a) Factor 5 Price	Contract Clauses. In accordance with L.3.6.a (Factor 5 - Price), Certified Cost or Pricing Data is not applicable to this solicitation. We recommend the Government remove Clauses 52.215-10 and 52.215-12, , or please clarify these Clauses only apply to future Task Orders and not this GWAC solicitation.
28	143	M.1 General	<p>The RFP is being evaluated based on a phased approach. Typically, when such an approach is contemplated, the proposal submission is also submitted in phases. Bid and Proposal (B&P) costs for a large IDIQ such as CIO-SP4 can run into the hundreds of thousands of dollars. Ultimately, the government pays for these costs typically through an indirect cost pool. For that reason, the government would substantially reduce the administrative burden and costs for both parties by re-structuring the proposal submission to be phased.</p> <p>The Phase 1 Proposal Go/No-Go submission could include the following proposal sections based on the draft RFP:</p> <ol style="list-style-type: none"> 1. L.3.1 Section 1 (General) which includes but is not limited to the self-scoring sheet, CTA information, OCI disclosures, and verification of an adequate accounting system. <ol style="list-style-type: none"> a. The Pricing/Cost information for the CTAs would be moved to Phase 2 when the pricing volume is submitted. 2. L.3.2 Section 2 - Factor 1 (Technical Capability and Understanding) 3. L.4.2 Financial Capacity <p>All other volumes including Corporate Experience, Management Approach, Past Performance, and Price would be submitted after the down-select as part of Phase 2.</p> <p>We respectfully request that the government consider the heavy burden, particularly on small businesses, when finalizing the RFP and allow for a phased proposal submission. This is a reasonable request given the large number of proposals anticipated and avoids companies with no hope of winning from wasting substantial amounts of effort and money. It also avoids the Government participating in unnecessary reviews of proposal volumes for companies that will not pass Phase 1.</p>

29	144	M.1.1.e	It appears the Government is creating a tiered evaluation of offers. If so, we recommend the contracting officer establish a tiered or cascading order of precedence for evaluating offers that is specified in the solicitation, which states that if no award can be made at the first tier, it will evaluate offers at the next lower tier, until award can be made. For example, unless the agency has specific statutory authority to do so, an agency is not permitted to state an intention to award one contract to an 8(a) BD Participant and one to a HUBZone SB, but only if no awards are made to 8(a) BD Participants.
30	146	M.2 Phase 1: Go/No-Go Requirements 1)	To ensure NITAAC awards to a set of vendors who are likely to be able to operate a government wide contract or major IDIQs, will NITAAC consider awarding increasing scores to vendors who can demonstrate the performance of 3, 5, and 10 such IDIQs with at least 10 task orders.
31	150	M.3.2	Please elaborate on Factor 2 - Corporate Experience which is currently blank
32	153	M.4 Phase 2 - Factor 5 Price Evaluation	It is recommended that the Government use simple, consistent, transparent, and reproducible evaluation methods for conducting price analysis in order to determine price reasonableness.