

December 31, 2022

Tiffany Hixson

Assistant Commissioner, Office of Professional Services & Human Capital Categories (PSHC)
General Services Administration
1800 F St NW Room 428 - PSHC
Washington, DC 20405

Dear Tiffany,

The Coalition for Government Procurement (“the Coalition”) would like to thank the General Services Administration (GSA) for the opportunity to submit comments on the first draft of the OASIS+ request for proposal (RFP).

As you know, 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 \$115 billion in spending through Government contracts, including more than \$23 billion dollars of professional services spending. The Coalition is proud to have worked with Government officials for more than 40 years towards the mutual goal of common-sense acquisition.

[Commitment to the Dialogue with GSA on the Future of OASIS +](#)

The Coalition’s members applaud GSA for the ongoing dialogue with its customer agencies and industry throughout the development of the acquisition strategy for the follow-on OASIS contract. We also sincerely appreciate GSA for its commitment to issuing a second draft OASIS+ RFP before the release of the final solicitation. We believe that GSA’s continued commitment to transparency and engagement with key stakeholders will lead to the creation of a next generation OASIS contract vehicle that will deliver efficient, effective best value solutions that meet mission critical customer agency requirements.

[Support for “OASIS+”](#)

Our members commend GSA for naming the next generation contract for the OASIS program, OASIS+, which builds upon the success of the initial program and signals GSA’s continued commitment to delivering best in class acquisition solutions for professional services that meet customer agency needs. Additionally, the Coalition commends GSA for the decision to maintain the best value construct and the small business construct which will be critical to the future success of the program. This structure will support small business opportunities through the future OASIS + program while streamlining contract administration and task order planning.

[The Enterprise Domain](#)

In addition, the Coalition endorses the concept of the Enterprise Domain as critical to providing solutions capable of delivering customer driven, high dollar, highly complex service solutions while also providing a comprehensive suite of domains that can support a broad spectrum of requirements across government. While the Coalition strongly supports the Enterprise domain, individual companies may

have differing views on the criteria/thresholds for evaluation. Those individual comments have been included in our spreadsheet. As a threshold matter, the Coalition supports a higher criterion as key to establishing an Enterprise Domain.

Transactional Data Reporting

Transactional Data Reporting (TDR) should be consistent with the task order contract type and customer agency invoicing. For example, OASIS+ contractors should not be required to report hours and labor rates under a firm-fixed price task order. Such an approach is inconsistent with the Federal Acquisition Regulation (FAR), as it would essentially serve to convert all firm-fixed price orders to a time-and-materials basis. The result would be to elevate time-and material orders to a preferred contracting type over firm-fixed price, a fundamentally inconsistent outcome given that ~~that~~ time-and-materials is the least preferred contract type.

Benefits of Increasing the Contract Term to 20 Years

The Coalition supports the 10-year contract term and recommends GSA consider adopting a 20-year contract term mirroring the MAS program. A 20-year contract, combined with a continuous on-ramp capability would provide a sound balance in terms of stability for customers and contractors while still providing an opportunity for companies to submit offers and join the program over a 20-year period. A 20-year period will also save both government and industry bid and proposal costs over the long term.

Thank you again for considering the Coalition's comments in response to the draft OASIS+ RFP. The attached spreadsheet includes individual comments regarding the evaluation criterion from our member companies for GSA's consideration. We look forward to the opportunity to continue to engage with you and your team in the New Year. If there are any questions, I may be reached at rwaldron@thecgp.org or (202) 315-0975.

Best regards,

Roger Waldron
President