



December 10, 2018

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Director, Office of Acquisition Operations
General Services Administration
1800 F Street N.W., 2nd Floor
Washington, D.C. 20405

Subject: The Future of GSA Contract Writing Systems

Dear Becky,

Thank you for the opportunity to provide industry input concerning the future of GSA's Contract Writing Systems.

As you know, the Coalition for Government Procurement ("the Coalition") is a non-profit association of firms selling commercial services and products to the Federal Government. Our members collectively account for a significant percentage of the sales generated through the General Services Administration's ("GSA") contracts, including the Multiple Award Schedule ("MAS") program. Coalition members include small, medium, and large business concerns that account for more than \$145 billion in Federal Government contracts. The Coalition is proud to have worked with Government officials for more than 35 years towards the mutual goal of common-sense acquisition.

The Coalition appreciates the Federal Acquisition Service's (FAS's) efforts to make it easier to do business with the Federal government and its focus on reducing the number of its electronic systems. In coordination with the industry day on the future of GSA's contract writing systems, we have asked our members for their input on what works well today with GSA's existing vendor-facing systems, the challenges they experience, their recommendations to improve the existing systems and their suggestions for a future contract writing system. The following is a list of recommendations and observations from our member companies. We hope that this information will be helpful as GSA works to improve its systems for GSA's acquisition workforce, their customer agencies and business partners.

What Works Well Today

In response to GSA's question about what works well today, members provided several examples.

1. eBuy

eBuy is one example of a system that works well for the following reasons:

- Simplicity and usability in design

- Government wide usage (which may be due to its simplicity and usability)
- Applicability to multiple contracts
- Automated alerts to specific contract holders

II. eLibrary

Schedules eLibrary includes pertinent and relevant information related to GSA Schedules. It has some challenges with the GWACS and OASIS information especially around being able to maintain vendor email addresses which get overwritten by their other company GSA schedules related email addresses.

III. ASSIST/ITSS

The ITSS help desk is extremely helpful and far more successful at resolving issues that one typically experiences when working thru a help desk. We presume the help desk somehow categorizes calls and issues. We recommend looking into that data to identify common topics / challenges faced by industry (which may be even more effective in identifying common widespread areas of concern than thru vendor feedback alone).

Challenges with Existing Systems

I. In General

Members report challenges with the number of unique systems and the fact that these systems do not share data. They have also observed that compared to other GWAC tools, GSA systems are down more often for maintenance during the evening and weekends.

II. ASSIST/ITSS

There should be just one name to refer to this system. The use of multiple names causes contractors some confusion (e.g., ASSIST, ITSS, RBA). Also, there is a great deal of manual entry of data that the government already has via other contract systems (e.g., FPDS). We recommend that GSA seek to utilize the data that already exists to the maximum extent practicable rather than having contractors re-entering the data on a regular basis.

ASSIST System Enhancements

1. GSA has been rolling out incremental enhancements to the system with regular frequency. The number and degree of frequency has made it challenging to keep abreast of what is necessary to know. Consolidating upgrades to reduce frequency will help users remain current. Perhaps target accounts that are utilizing impacted capabilities with enhancement notifications to reduce update fatigue.
2. “Post Award Collaboration” has made the system more cumbersome. Past iterations were less cumbersome as users could upload whatever documentation was necessary. The system now requires vendors to answer ~5 mandatory questions. Those questions are not always relevant to what is being addressed. Some actions also require comments to be added to

support the action. Comments are frequently required in support of obvious actions. Removing these additional steps or enhancing the triggers to make these requirements applicable when relevant will help system user friendliness.

3. The screens available to contractor and government users are significantly different. These differences contribute to challenges when trying to resolve issues with clients. Modifications de-obligating funding are a good example – the government interface provides color of money data which is not available on the contractor side. There is no reason for this information to be withheld from industry and insight would also facilitate de-obligation actions because contractors would not have to research the topic first.

ASSIST's System Limitations

1. Please increase the number of login errors before the system locks out contractors.
2. The system time out clock is short. Extending the amount of time before timeout will help reduce the amount of time spent repeating steps due to regular workplace interruptions.
3. Please have the system generate password update notifications as 90-day password expiration date approaches.
4. ITSS limits contractors to 6 attachments when uploading proposals. It appears to be an arbitrary number that can be an issue given some agency proposal volume requirements. Since file size seems not to be an issue, why limit the number of attachments?
5. System generated notifications provide little detail. A notification received because of a POC change doesn't look a lot different from an award, mod, RFP. You frequently need to go into the system to determine exactly what has happened. This can be particularly challenging when many people are using or have access to the system.
 - a. Identify what IDIQ or stand-alone contract notification is tied to will be useful for those contractors with multiple IDIQ, BPA, stand-alone contracts using ITSS
6. The system is difficult to access because of the notification email containing new orders. The email does not note which contract is being solicited, so its difficult for industry to log in with the correct contract password.

ASSIST RFP & Contract Files

1. Improve the ability to identify and segregate RFP's from award documentation
 - a. RFP and contract award files look the same – numbering and title conventions are the primary segregator. Would nice if there was an obvious visual differentiator or segregated into different sections within the system
2. SBSA RFPs – would be useful if large businesses could have read only access to SBSA RFP's. Will improve teaming efforts.
3. Obtaining contract modification documents requires excessive navigation. Executed modification documents and supporting files submitted by the contractor are located at different levels. Would be best if they were all at the same level so it's easier to keep track of everything.

4. The overly burdensome CLIN response requirements can cause contractors to move their whole pricing file into the system.

ASSIST Contract & User Account Registrations

1. Account registrations require too many steps – All new accounts are approved at the company level. And then you need to move a level down to associate the account request with a specific IDIQ, order, etc. Requesting accounts and tying them to specific vehicles, orders, etc. should be accomplished in one step.
2. Why is there no master admin account? The main account gives a contractor the ability to add new contracts, approve new user account requests, etc. But it cannot see all things that are approved under it. Where it has been associated with any IDIQ, order, etc. it can be removed by any user that also has access to that level. A contractor's primary account should have access to everything by default and should not be allowed to be removed at any level.

III. SIP

SIP, which is used for uploading GSA Schedule contractors GSA Authorized Price lists, is not user-friendly. The interface is far too complex and the manual is difficult to locate. Vendors often need to resort to calling the VSC which is time consuming and costly for GSA. This occurs even for frequent users of the system. It would be helpful if the new solution had the ability to manipulate the data in a logical way facilitating data entry for GSA's Schedule program.

IV. eOffer

The system oscillates between entering data into a field, picking from a drop down to uploading an attachment. This becomes cumbersome and clunky. Additionally, the system mandates that all required data elements on a screen be entered before allowing the user to progress to the next screen and does not allow the user to move from one screen to others as desired throughout the data entry process. Once the proposal is submitted, the submitter cannot review what was entered for either review or for historical purposes.

For both eOffer and eMod, the Schedule solicitations do not align with the requirements/screen entries.

V. eMod

1. The solicitation does not include instructions on what is required to be entered related to the contract action. While some centers have drafted a modification instructions document, these too do not necessarily align with the eMod system requirements. For example, the Commercial Sales Practice (CSP) form contained in the solicitations does not match what has to be entered into the eOffer/eMod.
2. Modifying a schedule is cumbersome in that the information/status from the current state (last mod) to the next does not pull information forward. There is no central repository of the

awarded items to easily modify in the system. All of the current negotiated items for a schedule holder are not contained within the system. They are separate excel, word, pdf, etc. attachments which tend to sometimes get lost or overlooked in finalizing a future mod's documentation. It varies from center to center and CO to CO.

3. There is no ability to see the historical record of submissions, nor the full contract information, including the original award and all modifications.
4. The system allows certain documents and information to be attached to the eMod submission, however, occasionally the contractor's documents appear to be attached but then are missing for the CO's review.

Recommendations for Existing Systems

The following are our member recommendations for GSA's existing vendor-facing systems.

I. In General

1. Currently the same data must be re-entered into multiple systems. It would be helpful for the vendors to know which system data is coming from. For instance, if there's an incorrect email displayed in the Schedules eLibrary, it would help if the vendor knows where the wrong data is pulling from, so it can be corrected there.
2. Allow for user ids to be assigned on an individual user basis (instead of one user id for a specific company account) and have the individual user ids associated with their corresponding company account so users assigned to a particular company account can access all data associated with that account based on their security permissions. This would minimize the need for vendors to contact GSA to transfer work from one user to another in GSA's systems if needed. Additionally, allow for the user to have single sign on to use one id for the entire process instead of having separate user ids and passwords/logins for multiple systems.
3. There should be fewer systems that should be able to share data.
4. Make usability a top priority as it is key to the important goal of government-wide usage.
5. Avoid using multiple names and/or labels for the same systems.
6. Have one system for all MACs and Schedules.
7. Provide automated alerts to prime contract holders with links into the appropriate system record.
8. Allow for traceability of solicitation number into the order number.
9. Have one record and record number for one requirement. (Members have seen as many as four RFIs plus and RFP for the same requirement—each one with a new number.)

II. GSA Schedule Awards & Administration

1. Include the ability to retain/store the base award and all executed modifications for historical purposes. This would be helpful to both GSA and Industry. Currently, after the award or modification is executed, it's no longer available for the vendors to see after certain time period.
2. Include a "Status" of the submission with more than just "pending" as exists today. It would be helpful if there was a status provided to the offeror/schedule holder that denotes where

the submission is in GSA's queue and/or where it is in the process (e.g., in review, under 2nd level review, etc.).

Recommendations for a Future Enterprise Contract Writing System

Members also provided some "must haves" for FAS's future enterprise contract writing system and some considerations as GSA goes through the discovery process for the new tool.

I. "Must Haves"

1. An ability for the contract writing system to be a consolidated and integrated end-to-end solution (proposal to award), capturing and sharing data within the solution to minimize the need for duplicative data entry and multiple logins.
2. The data accessed, posted, and created by GSA should be aligned with the data accessed or submitted by contractors.

II. Additional Considerations for a Future Contract Writing System

1. An ability to view historical contract actions in one place.
2. Have a consolidated access point - (single sign on with the ability to have various "modules" if needed). For example, once awarded a schedule, the system should have the ability to enter IFF sales reporting into the same system/sign-on.
3. Cover multiple purposes/modules by function in the solution (e.g., new offers, modifications, 72a reporting).
4. Allow for a method to submit and track electronic communication between GSA and its contractors (and vice versa) to handle questions and concerns. This could be similar to email, but have the communication tracked in the system and accessible by other users who have access to the vendor account so information is not lost in emails.

Thank you again for the opportunity to submit recommendations for GSA's existing vendor-facing tools and a future contract writing system. We look forward to future opportunities to provide input as FAS identifies requirements and capabilities for the new system. If there are any questions, please contact me at (202) 331-0975 or rwaldron@thecgp.org.

Sincerely,



Roger Waldron
President