

August 23, 2021

Jeffrey A. Koses – M1V
Senior Procurement Executive
U.S. General Services Administration
1800 F St., NW
Washington, DC 20405

Dear Mr. Koses:

During the last year of the previous Administration, the Federal Acquisition Service (FAS) issued a notice to proceed with the development of a follow-on contract vehicle to the One Acquisition Solution for Integrated Services other than small (OASIS) contract vehicle and the companion small business set-aside contract vehicle (OASIS SB). Initially, the follow-on effort was named the Best-in-Class Multi-Agency Contract, or “BIC MAC,” and now, it is called the “Services MAC.” By any name, however, the acquisition strategy raises significant concerns regarding its impact on strategic customer agency mission support, small business opportunities, including small, disadvantaged businesses, and contract duplication.

The unintended consequences of the current strategy are significant. The follow-on acquisition strategy eliminates the highly successful dual contract vehicle structure, eliminating OASIS SB and OASIS in favor of a single, overarching contract vehicle for professional services. The follow-on strategy also eliminates the best value evaluation methodology for contract award that has been foundational to the success of OASIS SB and OASIS in delivering strategic mission support to customer agencies. Finally, the follow-on strategy essentially duplicates GSA’s Multiple Award Schedule (MAS) program, increasing operational costs and complexity for customer agencies, the General Services Administration (GSA), and its industry partners.

THE CURRENT ACQUISITION STRATEGY ABANDONS THE SUCCESSFUL DUAL CONTRACT MODEL

In 2013, GSA launched the 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. As evidenced by Chart 1 in the attachment hereto, the contracts accounted for \$30 billion in customer agency mission support, with over \$10 billion of acquisitions in 2020 alone. The biggest customers of OASIS SB and OASIS are the Department of Defense and FEDSIM in FAS’s Office of Assisted Services, accounting for over 70 percent of OASIS and OASIS SB. Today, OASIS SB and OASIS stand as the most successful government-wide contracting programs for complex, integrated professional services.

The OASIS SB-OASIS 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 and small disadvantaged 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 Biden Administration's goal of increasing opportunities for small, disadvantaged concerns and other small businesses.

To GSA's credit, the result has been impressive. OASIS SB accounts for just over 40 percent of the cumulative obligations under the program, well above the governmentwide goal of 23 percent of contract spend going to small businesses. Additionally, throughout the lifespan of the OASIS program, small, disadvantaged businesses have accounted for 12 percent of total obligations, totaling \$3.8 billion via OASIS SB. Just last year, OASIS SB accounted for over \$800 million in obligations to small disadvantaged small businesses. Chart 2 sets forth the success story of OASIS SB in meeting customer agency mission support through highly qualified small businesses across multiple socio-economic categories. This high market demand for this small business vehicle is the paramount measure of its success.

Given the success of OASIS SB and OASIS in meeting customer agency needs while promoting opportunities for small businesses, GSA's industry partners are perplexed by FAS's apparent decision to abandon the OASIS SB-OASIS model in favor of a single contract vehicle that essentially duplicates the Multiple Award Schedule (MAS) program. This decision has been made despite the fact that, as FAS announced during an industry day presentation on July 22, 2021, the business case for the follow-on strategy has yet to be completed to support its plan for the Services MAC. Under these circumstances, the credibility and utility of the business plan may be perceived, not as a discipline to identify the best contracting approach, but as a shield to defend a pre-determined contracting approach.

Significantly, the current acquisition strategy for the OASIS SB-OASIS follow-on is inconsistent with the FAS IT Category's current strategy for its IT GWACs. The IT Category is seeking to establish its POLARIS IT GWAC as a standalone small business contract vehicle to compliment the MAS program and Alliant. That the OASIS follow-on strategy is a 180-degree departure from the IT Category approach raises significant questions regarding FAS's overall market strategy and its continuing support of small business opportunities. It is difficult, from an industry partner perspective, to see how FAS reconciles the two diametrically opposed approaches. Finally, as noted, the planned elimination of a specific channel for small and disadvantaged businesses, and the associated increase in difficulty of use for agency customers and those businesses, appears to run contrary to the express goals of this Administration.

THE CURRENT ACQUISITION STRATEGY UNNECESSARILY DUPLICATES THE MAS PROGRAM

FAS's current acquisition strategy for the OASIS follow-on would establish a single, open-ended contract vehicle that essentially duplicates the MAS program. Chart 3 of the attachment identifies this program convergence, leaving few key features that differentiate between the two programs. With continuous open seasons, thousands of contractors, and IOA visits, from a structural perspective, there is little difference between the proposed Services MAC and the MAS program. Moreover, regarding the task ordering procedures and small businesses, FAS acknowledged the convergence at its industry day, stating, in part, that the procedures would operate just like the MAS program.

During that industry day, FAS also indicated that it would rely on a dedicated team of contracting officers, including those with MAS experience. To the extent this management approach shifts Services MAC workload to MAS contracting officers or otherwise diverts contracting staff from the MAS program, it raises questions about the allocation of resources and contracting support for GSA's government-wide contracting programs. A plan that utilizes MAS contracting officers to help administer the OASIS follow-on contracts prompts concerns about the overall impact on contracting operations and the support and development of the contracting officers. Coalition members are very concerned that already overtaxed MAS contracting officers will now be faced with additional workload,¹ as this additional work could impact the integrity of the Schedules program. This risk of harm is not speculative. Though unquestionably successful and the single largest source of overall small business contracting, there are current workload challenges in the MAS program to be addressed. For example, concerns have been raised about the time it takes for vendors to receive a contract award or secure contract modifications.

In sum, the OASIS follow-on, as currently designed, will result in a parallel agency organization with associated infrastructure and administrative costs of a magnitude consistent with the current MAS program. At the same time the overlap between the MAS program and the Services MAC risks creating increases in complexity across contracts and administrative processes for customer agencies and contractors. In so doing, it eliminates a separate, designated small business channel into which agencies can identify and feed their targeted small and small disadvantaged business orders, allowing those businesses to identify and compete for business with ease. Finally, the current duplicative acquisition strategy for the OASIS follow-on is inconsistent with Category Management's goal of reducing unnecessary contract duplication.

Based on the foregoing, the Coalition would like to invite you, in your role as Senior Procurement Executive, to meet with our members to understand your perspective on the significant issues impacting the acquisition strategy for the OASIS follow-on. I will reach out to schedule a virtual meeting at your convenience. I am also including the following links to further discussions of the issues surrounding the acquisition strategy for the OASIS follow-on:

- [Part 1: Duplication in GSA's BIC MAC and MAS Programs](#)
- [Part 2: Cost Reimbursement Capability for the MAS Program](#)
- [Part 3: OASIS Is Built to Last](#)
- [OASIS Follow-on: The 10 Billion-Dollar Question](#)

¹ Interestingly, in its recent report of the Commercial E-commerce Pilot, GSA stated that one of the reasons for not conducting a pilot of the e-procurement and e-commerce models was that "GSA would need to implement a program on a similar magnitude than the current GSA Multiple Award Schedules (MAS) program. Here again, GSA's position appears inconsistent in this regard when compared to the follow-on strategy for the "Services MAC." It appears GSA is embarking on building a program that is similar in magnitude to the MAS program.

Thank you, in advance, for your attention to this matter. Any input you provide to industry will be appreciated greatly.

Sincerely,

A handwritten signature in black ink, appearing to read "Roger D. Waldron", written over a light gray rectangular background.

Roger D. Waldron

cc: Robin Carnahan, Administrator, GSA

Sonny Hashmi, FAS Commissioner, GSA

Attachments

Chart 1:

OASIS and OASIS SB

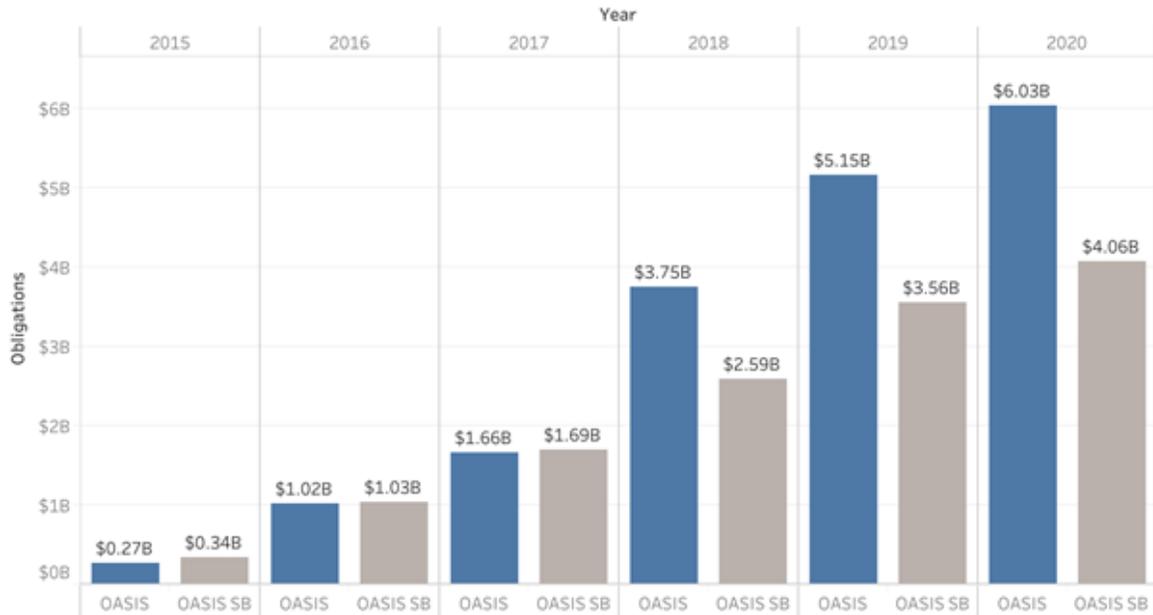
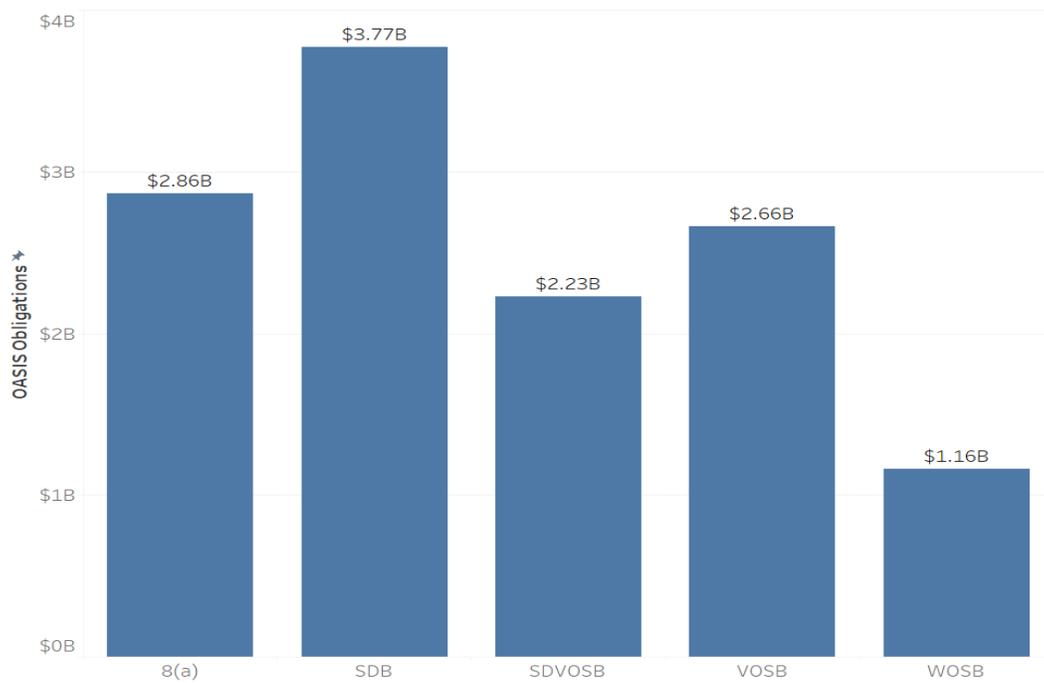


Chart 2:



2015-2020

Chart 3:

Features	MAS	Services MAC
Continuous open seasons	√	√
Large pool of qualified contractors	√	√
Simplified, lower evaluation criteria, lower threshold for entry	√	√
Use of the Section 876 authority to increase task order competition*	√	√
Professional and complex professional services	√	√
Commercial Items	√	√
Solutions buying	√	√
Small and large businesses in a single contract	√	√
Competitive ordering procedures	√	√
Flexibility to set-aside orders	√	√
Order Types	√	√
Firm fixed price	√	√

Labor hour	√	√
Time & material**	√	√
Cost reimbursement, non-commercial services	***	√

* GSA is examining implementing this authority for the MAS program as well as potentially using it for the Services MAC.

** GSA implemented Order Level Materials on MAS contracts.

*** Cost reimbursement was addressed in a recent Coalition blog [here](#).