



April 29, 2013

Jim Ghiloni
Director of the OASIS Program Management Office
General Services Administration
2200 Crystal Drive 11104
Arlington, VA 22202

Re: OASIS Unrestricted Draft Solicitation

Dear Jim:

Thank you for the opportunity to provide comments on the draft solicitation for the One Acquisition Solution for Integrated Services ("OASIS") Unrestricted contract vehicle for complex professional services.

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 approximately 70% of the sales generated through the GSA Multiple Award Schedules (MAS) program and about half of the commercial item solutions purchased annually by the Federal Government. Coalition members include small, medium and large business concerns across the spectrum of professional services that are included within the scope of OASIS. The Coalition is proud to have worked with Government officials over the past 30 years towards the mutual goal of common sense acquisition.

The Coalition supports GSA's efforts to create a contract vehicle that meets the needs of customer agencies seeking multi-disciplinary professional services and that can accommodate all contract types at the task order level. In order for the OASIS Unrestricted vehicle to be successful, it will need to be easy for customers to use and offer cost-effective creative solutions that meet agency specific requirements. In response to the OASIS Request for Information (RFI), our general recommendations are that GSA further enhance the ease of use of OASIS and

remove the NAICS Pools in the final solicitation. More detailed suggestions and questions are provided in the attached RFI template.

Ease of Use

A primary objective of OASIS is to offer an easy to use complex professional services contract to customer agencies who cannot use the Multiple Award Schedules or Government-wide Acquisition Contracts for a total solution. In order for OASIS to be the contract vehicle of choice for these customers, it is critical that it be efficient and easy to use. From the draft solicitation, it is clear that GSA has sought to make OASIS as flexible as possible by allowing for Other Direct Costs (ODCs) and multiple contract types at the task order level.

However, there are additional areas where ease of use could be improved by aligning more with commercial practice, rather than creating complex systems that are unfamiliar to both Government and industry. For example, as outlined in the attached comments, the inclusion of the Standard Occupational Classification (SOC) system into OASIS will add an unintended level of complexity to the contract for customer agencies and contractors. Moreover, in our view the current structure differs from commercial and Federal practice regarding the categorization and contract structure for professional services. Labor category information in the OASIS contract should be consistent with what is already familiar to ordering contracting officers. A more efficient and effective approach for both OASIS customers and contractors would be to group the labor categories by function in alignment with standard commercial practices for professional services.

NAICS Pools

The Coalition strongly recommends eliminating or simplifying the six NAICS Pools in OASIS Unrestricted. The inclusion of the NAICS Pools introduces an unnecessary level of complexity for both customer agencies and contractors. Based on recent discussions, we understand that GSA intends to award 40 contracts, plus ties, and that these contractors would be able to compete across all NAICS codes referenced at the task order level. As such, the six pools are not relevant to the Basis of Award process outlined in Section M. Further, the inclusion of the six NAICS Pools gives the impression that task orders will be segmented functional work rather than integrated complex professional services that are the hallmark of OASIS. The NAICS Pools overshadow the six core disciplines (Financial, Logistics,

Engineering, Scientific, Management Consulting, and Program Management) that are the foundation of the OASIS Program Architecture. In order to clarify the award process for contractors and streamline the ordering process for Federal agencies, we recommend that GSA remove the six NAICS Pools from OASIS Unrestricted.

Again, the Coalition appreciates GSA's openness to industry feedback during the development of the OASIS contract vehicle and the opportunity to comment on the draft solicitation. If there are any questions, please contact me at (202) 331-0975 or rwaldron@thecgp.org.

Sincerely,

A handwritten signature in black ink, appearing to read 'Roger Waldron', with a long horizontal flourish extending to the right.

Roger Waldron

President

REQUEST FOR INFORMATION TEMPLATE

Instructions: Interested parties are encouraged to ask questions and/or identify elements of the solicitation that seem unclear or require editing. Interested parties are also encouraged to suggest recommended changes and/or identify elements of the solicitation that seem very strong and should remain. Interested parties may submit feedback using the template any number of times prior to the due date. Please identify the Section Number and Page Number in Column A that corresponds to your feedback in Column B. Add or Delete Rows as necessary. E-mail Responses to oasis@gsa.gov

POINT OF CONTACT	
Name:	Roger Waldron
Title:	President
Agency/Company:	The Coalition for Government Procurement
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DRAFT RFP SECTION NUMBER	COMMENTS/QUESTIONS/SUGGESTIONS
Section B.2.1, p. 11	This section identifies that OASIS provides standardized labor categories that correspond to the Office of Management and Budget's (OMB) Standard Occupational Classification (SOC) for which the Bureau of Labor Statistics (BLS) maintains compensation data. Given that each Professional Employee Compensation Plan is required to include supporting rationale, such as recognized national and regional compensation surveys or studies of professional, public and private organizations used in establishing the total compensation structure, the BLS SOC may be in conflict with what is considered acceptable under these Compensation Plans. How will GSA evaluate/determine the acceptability of a proposed Compensation Plan? (e.g. What factors will be considered?)
Section B.2.1 Labor Categories and Standard Occupational Classifications, p. 11	The introduction of Service Occupational Classifications into the OASIS contract represents an unprecedented complexity into a contract that was originally touted as easy to use. It is complex for the government and complex for the contractor. The information may be suitable for studies, analysis and trends based on historical data, but it is not suited for determining pricing on current tasks under current market conditions. Ordering Contracting Officers are accustomed to reviewing labor category descriptions and rates on contracts where the rates have been determined to be fair and reasonable without having to understand the background of the underlying methodology or survey data. Defining labor categories as Junior, Journeyman and Senior, all requiring degrees without equivalency in terms of years of experience then requiring any deviations to be clearly identified in proposals, adds to the complexity and unnecessarily reduces competition. Fundamentally, it reduces the flexibility of OASIS contractors to meet customer agency requirements. Further, grouping the labor categories corresponding to groups of SOC Numbers, Titles and Functional Descriptions adds to the complexity even if the multiple SOC numbers within each labor category group have similar salaries based on the BLS data.
Sections B.2.1, p.11, B.5.1, p.13 Section J, Attachment 1, p1 and L.6, p. 86	The labor category current structure is inconsistent with standard commercial and federal practice. This is an important ease of use concern for potential customer agencies. The current labor categories generally do not reflect those commonly used for professional services across the federal government. For example, there is no readily identifiable logistician category--which will be of particular concern to DoD customers. It appears that the labor categories are grouped by compensation rather than function. This will be confusing to customer agencies and make data collection and reporting more complex and costly. A more efficient and effective approach for both OASIS customers and contractors would be to group the labor categories by function. In addition, given the broad scope of OASIS, we recommend adding additional labor categories for more comprehensive footprint that better aligns with the core disciplines identified in Section C. Again, we strongly believe that these changes will enhance customer agencies ability to develop sound OASIS statements of work and compete task orders. Finally, it does not appear that the BLS cost index matches up with the occupations/professions included in the scope of OASIS. Recommend utilizing an up to date index that better reflects the professional services to be provided under OASIS.
Sections B.2.5.1, L.6, p.13	The Draft RFP states that in accordance with Section B.2.5.1, OASIS will only establish ceiling rates for T&M/L-H task orders/CLINs placed on a sole source basis or when adequate price competition is not anticipated, therefore, the proposed ceiling rates do not apply to fixed-price, cost-reimbursement, or T&M/LH task orders when adequate price competition is anticipated. When the provision FAR 52.216-30, Time-and-Materials/Labor-Hour Proposal Requirements--Non Commercial Item Acquisitions Without Adequate Price Competition is selected or; FAR 52.216-31, Time-and-Materials/Labor-Hour Proposal Requirements--Commercial Item Acquisition is selected and there is an exception to fair opportunity, OASIS establishes maximum allowable labor rates in the form of fully burdened ceiling rates for all professional, non-ancillary, CONUS, T&M/L-H labor for both Government and Contractor Sites. Please confirm.
Section B.3.1, p. 14.	Please clarify the process for adding specialized professional services labor categories. Will the rational additions be based on a single contractor's experience regarding specialized professional services categories or must it involve multiple contractors experiences on various task orders? When a new specialized professional services labor category is identified for addition to the contract, we assume modifications and pricing would be negotiated separately with all OASIS contractors--please confirm. Additionally, please confirm whether specialized professional services labor categories can only be included in a task order when such services are considered ancillary support. Many specialized professional labor categories may fall within the very heart of the six core disciplines identified in Section C.

Section B.3.6	Please clarify the relationship between travel costs and indirect costs. Contractors should be able to apply indirect rates to travel consistent with the contractor's accounting practices.
Sections F.4.2, p. 25 and G.3.5, p. 36	Recommend revising the close out timeframes for cost type contracts and time and materials/labor hour orders--given the great complexity of accounting for costs on such orders, the timeframe should be greater for such orders--which would be consistent with the FAR. In many cases close out is contingent on government action--such as rate settlements for indirect costs by the appropriate audit entity (DCAA). There are often backlogs regarding such settlements.
Sections B.3.2 and B.3.3 p. 14 and C.4, p.21.	Please confirm whether services subject to the Service Contract Act and the Davis Bacon Act are outside the scope of OASIS. As currently structured Section B.3.2 and C.4 appear somewhat inconsistent. If such services can be included on an order, then they are within scope. Recommend clarifying the language regarding the services subject to the Service Contract Act and/or the Davis Bacon Act.
Section G.3.1, p. 31	This section states in part that on all task order solicitations, regardless of contract type, the Contractor shall include CAF in their cost or pricing proposals. In addition, the Contractor may be required to identify the CAF as a separate line item in their proposal and the task order award may identify the CAF as a separate Contract Line Item Number (CLIN). Given that CAF is not to be priced on the T&M/LH rates, would recommend addressing how CAF on T&M/LH orders should be addressed. While the OCO may have discretion in this regard, a separate CLIN for all CAF is preferred-- especially if a cap on CAF is part of the final RFP and resulting contract.
Section H.4.2.1 NAICS Pools, p. 40 and Section M.2 Basis of Award, p 95.	We strongly recommend eliminating or simplifying the 6 NAICS Pools on OASIS Unrestricted. Under OASIS Unrestricted the "pool" structure articulated in Section H and Section M is unnecessary and confusing. Moreover, in light of communications and statements by GSA representatives indicating the intent to award 40 contracts, plus ties, (contracts that subsequently will compete across all NAICS codes identified within the scope of the contract) the current NAICS code structure is not relevant to the Section M evaluation and award process. The draft solicitation states the following at M.2: "The Government intends to make 40 awards in each OASIS Pool resulting from this solicitation." This statement is clear. It says that GSA intends to award up to 240 contracts, plus ties, across the six pools. However, in discussions with GSA regarding the pools, we have learned that the actual intent is to award only 40 contracts, plus ties and that all 40 contractors would then be able to compete across all the NAICS codes referenced in the contracts/solicitation. As such, the six pools are not relevant to Basis of Award outlined in Section M and should be eliminated in order to clarify the award process. The six pools also are not necessary for the task order process. Under the proposed SBA rule that has been identified as the impetus for the pool structure, contracting officers will assign the appropriate NAICS to each task order based on the predominant task work to be performed. The NAICS pools are not necessary and do not add to the ease of use of the task order process under OASIS Unrestricted. Moreover, the pools send a mixed message regarding the acquisition strategy for OASIS Unrestricted. The pools indicate that task orders will be narrow and segmented functional work rather than integrated, complex total solutions.
Section H. 6, p. 42 and Section M.4.5, p. 99.	This section indicates that all Systems, Compliances, and Certifications shall be in the Contractor's official legal name as identified on the OASIS award document. Systems, Compliances, and/or Certifications from a Subsidiary and/or Affiliate of the Contractor will not be considered. The revised language at L.3 indicates that a "meaningful relationship" and "commitment letter" approach will be utilized. Given the changes at L.3 it would seem that associated edits to H.6 would also be required. Further, we would also request that Systems, Compliances, and/or Certifications issued to the parent of an offeror company and which apply to its affiliates and/or subsidiaries also be considered acceptable for the submittal of any supporting documentation. With regard to the Section M evaluation of certifications, the available evaluation credit appears inconsistent with the overall scope of the OASIS acquisition (Unrestricted and SB). Credit is limited to certain specific functional areas which potentially limits competition and may unintentionally limit potential solutions at the task order level. Recommend reviewing the evaluation of certifications to ensure it meets the government's cross-cutting needs. Perhaps extend the potential credit across the various core disciplines. Also request a statement addressing the rationale for evaluating CMMI.
Sections H.6.1 through H.6.9 and H.6.10.1, p. 42-45, 46	Please address how the Government will be managing the information submitted by companies--will it be protected as proprietary if identified as such by the submitter?
Section H.6.12, p 48	This section should be clarified. Competitive solutions proposed by contractor in response to a government requirement reflect commercially sensitive, proprietary approaches. As such, the technical solutions will be marked as proprietary in almost all instances. Recommend leaving this issue to the holder of the requirement who issues a task order under the contract.
Section H.6.13, p48	Recommend this requirement be left to the discretion of the ordering activity--can be addressed as a term of a task order if necessary.
Section H.6.14, p. 48 (Small Business)	In order to meet the spirit of the Government's Small business subcontracting efforts, we recommend that 50% of the cost of the task order performance be incurred for personnel by a small business OASIS SB Prime contractor <u>or a SB subcontractor.</u>
Section H.9.3, p. 51	Rather than identifying/highlighting one specific remedial act that a contracting officer may take (requiring the contractor to sign an OCI statement), we recommend emphasizing/reiterating the FAR OCI guidance as a whole in setting the framework for mitigating potential conflicts. In addition, there will often be agency-specific supplemental OCI guidance.

Section H.12, p. 54	The approach of placing contractors into a "Dormant Status" introduces a new classification which is not currently supported by law and regulation. While the importance of remaining compliant and delivering quality services is incumbent upon any successful contractor, there may be unintended consequences of utilizing a new mechanism such as placing contractors into a dormant status. As an alternative, the use of CPARs to record any performance issues that might be a consideration on receipt of future awards would seem to be an approach for consideration. The dormant process creates an unnecessary level of complexity in the OASIS program. Traditional tools such as the unilateral right to exercise options, or exercise of partial options already exist. The number of awards needed to avoid dormant status, given the number of task orders over the first contract period, appears unrealistic. This is a significant issue as "dormant" status does not appear to be temporary and the criteria/process is subjective. Moreover, the issuance of a final decision imposing "dormant status" on a contractor by the OASIS contracting officer is akin to a termination for default and can be appealed to the civilian board of contract appeals or the Court. The FAR and FAR clauses provide sufficient mechanisms to address the concerns that the "dormant" process seeks to address. We strongly recommend utilizing pre-existing FAR-based mechanisms.
Section J.1., Attachment 1, p.62	Please clarify the subject matter expert category—is there a category for each of the disciplines? Recommend clearly providing subject matter experts for each of the core disciplines.
Section L.2.3, M.2, p. 74, 95	This section states that the Government intends to establish a Multiple Award IDIQ Contract that consists of 6 separate Pools of Contractors based upon size standards and 40 contract awards for each Pool. A single Contractor may compete for more than one Pool. This might be interpreted that separate awards to a single contractor for each pool are to be made; whereas, we believe the intent is to make a single award to each contractor with the awarded pool(s) identified within that contract award. This section might also be revised to state that the Pools are only being utilized for the purposes of determining size status. The practical effect being that awardees on the unrestricted solicitation would receive an award with all six pools, and awardees on OASIS SB would only receive those pools for which they qualify as being small.
Section L.3 Instructions, p. 75	Draft indicates that GSA is considering the affiliates, internal divisions and subsidiaries of an Offeror only if the Parent Company is the official bidding entity on the SF 33. Further, for Systems, Certifications and Resources, the proposal submission must be in the legal bidding entities name as identified on the SF 33. Corporate structures can be complex. It is not uncommon for corporate systems to support the legal bidding entity identified on the SF 33 along with other corporate entities. In such a case the legal bidding entity would not be the same as identified on the SF 33. This could have unintended consequences without merit. We understand GSA has stated that it will be revising this section to provide greater flexibility for offerors with differing corporate structures. This should include the experience, projects/past performance and certifications as well. We look forward to the revisions and recommend that GSA provide an opportunity to comment further.
Section L.3 Instructions, p. 75	In addition, GSA should further explain/address the prohibition on joint ventures and teaming arrangements, especially for OASIS SB. Teaming arrangements and joint ventures are powerful tools to enhance competition, access sophisticated services as well as promotion of small business concerns.
Section L.5.3.1, p. 85 and M.5, Scoring, p. 100	We'd like GSA to define "Involve" in the following sentence, "Involve the performance and/or integration of at least Four (4) out of the Six (6) OASIS Core Disciplines. The OASIS Core Disciplines are described in Section C and include Program Management Services, Management Consulting Services, Scientific Services, Engineering Services, Logistics Services, and Financial Management Services." For example, if a single project involves performance of four of the six core disciplines, but are through more than one task order or modification to an existing task order--will that receive credit? If not, why not?
Section L.5.3.1, p. 85 and M.5, Scoring, p. 100	It is our understanding that the average task order size under Alliant is significantly less than \$50 million. Since OASIS is most often compared to Alliant, it would be helpful to provide an explanation as to how the project dollar levels for evaluation credit were developed. When read together, it appears that L.5.3.1 and M.5 require each project to exceed \$50 million per year in total value, including options, in order to receive the maximum point score. Is this level relevant/consistent with potential OASIS task orders?
Section L.5.3.2.3, p. 86	The requirements under this section include the submittal of a Contract Award Form identifying the Contract/Order Number and Offeror's name as the Prime Contract Awardee. The indication at Section L.3 is that GSA will consider affiliates, internal divisions, and subsidiaries of an Offeror, only if the Parent Company is the official legal bidding entity on the SF 33. To remain consistent would recommend revising the language at L.5.3.2.3 to indicate Offeror's name (or affiliates, internal divisions, and subsidiaries of the Offeror) as the Prime Contract Awardee.
Section L.5.4.3, p. 87	This section requires in part that for each of the Five (5) Relevant Experience projects submitted under Section L.5.3.2., the Offerors shall submit a copy of the Individual Summary Report (ISR) or Summary Subcontract Report (SSR) that was finalized in the eSRS system. Another requirement is that for each project that is identified as a task order awarded under an IDIQ Contract or GSA Schedule, that has been completed within the past five (5) years prior to the solicitation closing date, Offerors must submit the Final SSR related to IDIQ Contract or GSA Schedule if the task order did not have a Subcontracting Plan requirement at the task order level. Given that the SSR is an agency level report that potentially includes reporting across multiple contracts issued by the agency, isn't the ISR for the contract the more appropriate report?
Section L.5.4.1, p. 86	Please confirm that CPAR's "preceding interim" refers to the most recent annual CPAR submitted by the customer and not the average of all the previous CPARs submitted for that task order.

Section L.5.4.1, p. 86	Please confirm a CPAR's performance period may not always be the most recent performance period of the task (if a customer did not complete a CPAR for the past year, however they did one in a prior year). In a previous industry meeting, the OASIS team indicated that a CPAR would be accepted if it was finalized but not uploaded into the system by the agency. Please confirm and clarify this section accordingly.
Section L.5.4.1, p. 86	Recommend including some flexibility in the use of PPIRS and CPARS (including subsystems, such as ACASS) and allow electronic versions of hard copies of finalized assessments that the government staff may not yet have loaded to the system. We recognize that contractors have every opportunity to encourage our government customers to ensure updating CPARS for those past performances and experiences we may cite. Contractors cannot control when a government official uploads evaluations to the CPARS system, which then reports in PPIRS. Additionally, subsystems may not have been integrated into CPARS or PPIRS that contain equivalent objective contractor evaluations completed by DoD, federal and civilian government staff. GSA should consider these subsystems by accommodating submission of electronic versions of hard copies for validation under the source selection. An example of this subsystem is the ACASS system for DISA.
Section L.5.4.3, page 87	We appreciate the fact that the scoring criteria in OASIS Unrestricted rewards those companies that helped small businesses by meeting or exceeding their contracts' small business goals. Recently graduated small businesses, however, may be overly penalized for making the transition from small to large business in the draft solicitation. With the most recent adjustments, the scoring for small business goals and all the socioeconomic subgoals allocates up to 1500 points (22%) for which many graduated small business (now large) bidders often are not eligible to earn. Therefore, we suggest lowering the allocation to 50 points for meeting the Total Small Business Goal on each referenced contract or an additional 10 points for each contract meeting each of the socio-economic categories for a total of 500 (9%) available points related to Small Business Goals.
Section L.5.5.11.1, p. 91; M.5, p.101	<p>Current scoring emphasizes PMP over experience. Recommend more emphasis on experience. Experience in managing large multiple-agency or agency-wide MA-IDIQ programs is more important than a PMP certification or Masters Degree that might only be a week old.</p> <ul style="list-style-type: none"> • Recommend scoring years of experience significantly higher than other COPM factors or focus COPM rating on years of experience exclusively. • Additionally, recommend that the government consider total years of experience in program/project performance and management of contracts and task orders encompassing at a minimum 2 of the disciplines supported under OASIS, with more points assigned if management experience and past performance covers more than 2. • Recommend that the requirement be modified for the Masters Degree in Program/Project management or Core Discipline under OASIS. These requirements are more appropriately required at the task order level. Suggest that the requirement and scoring be revised to consider years of experience in providing core discipline technical services to the government as a substitute for the Masters Degree. • Recommend that the requirement for a PMP is more appropriate at the task order level, and recommend that it not be a scoring factor for the OASIS master contract vehicle. Successfully managing a government-wide IDIQ contract is significantly different than managing a technical services task order, with much of the effort focused on outreach and business development activities.
Section L6. Volume 6 – Cost/Price, p. 92	<p>Junior, Journeyman and Senior Labor Categories all have years of experience and degree requirements. Junior labor category requires up to 3 years of experience and a BA/BS degree. Journeyman labor category requires 3-10 years of experience and a BA/BS or MA/MS degree. Senior labor category requires over 10 years of experience and a MA/MS degree. Degree requirements are overstated and should include years of experience equivalency for the various degree requirements. Such stringent degree requirements typically impact the hiring of certain groups within the workplace such as veterans with significant experience but no degree. Years of experience requirements for labor categories are typically expressed in terms of the minimum experience required instead of "up-to" or a range.</p>
Section M.2 Basis of Award, p.95	Please clarify the number of awardees. Section M.2 currently states that "The Government intends to make 40 awards in each OASIS Pooling resulting from this solicitation." This computes to at least 240 awardees. Based on comments from GSA the actual intent is to award 40 contracts, plus ties for OASIS. Please confirm our understanding and revise the RFP accordingly. Similar language regarding the 40 per pool appears throughout Section M--see, for example Section M.3.
Section M.3, p. 95	This section states that once the screening process is complete, the OASIS evaluation team will assign preliminary score (in accordance with the Scoring System in Section M.5. of the OASIS solicitation) for all offers based upon the Offeror's proposal checklist. Then the OASIS evaluation team will then verify that the Top 40 Offerors (based upon score) in each OASIS Pool has successfully passed all of the Acceptability Review requirements in Section M.4. of the solicitation. Will this assignment of a preliminary score and Acceptability Review include those offerors who are tied at the position of number 40?
Section M.4.4.1, p. 98-99	Some customers add criteria/considerations to the 6 mandatory/default criteria identified in Section M. Please confirm that GSA will only use the ratings on the 6 criteria listed in Section M and not any additional criteria/considerations added by customers agencies.
Section M.4.4.1, p. 98-99	Suggest that GSA consider Award Fee scores/ letters as an alternative to CPARs to evaluate past performance when CPARS are unavailable for a specific project.

<p>Section M.4.5.3, M.4.5.4 and M.5, p. 100 and 101; L.5.5.11.1 and L5.5.11.2, p. 91 and 92.</p>	<p>The evaluation methodology/criteria for key personnel essentially limits/excludes acquisition management professionals who do not have a masters degree by awarding additional points for such a degree. In order to provide flexibility and access to seasoned professionals across the private sector, we recommend revising the criteria regarding masters degree. In addition, the 15 years experience also further limits access to potential successful/exceptional managers. This is important because the evaluation drives an offeror to achieve maximum points--and as a result, the unintended consequence will be to limit the pool of potential contract managers. In addition, specific certification/accreditation entities are called out, recommend allowing "or equivalent" with supporting documentation.</p>
<p>Section M.5, p. 100</p>	<p>Are the resumes for the COPM and COCM intended to be the supporting documentation that will substantiate that any PMI and NCMA certifications are held by the candidates? Recommend providing for equivalent certifications to expand the pool of candidates. The current structure unnecessarily limits availability of otherwise qualified professionals.</p>
<p>Section M.5, p. 100</p>	<p>Can GSA clarify the evaluation methodology--will it include narrative explanations/documenting the rationale for the points awarded under each of the criteria and sub-criteria?</p>