



January 29, 2020

Keith Nakasone  
Deputy Assistant Commissioner for Acquisition  
General Services Administration  
1800 F Street, NW  
Washington, DC 20405

Dear Keith,

The Coalition for Government Procurement (The Coalition) appreciates the opportunity to submit feedback on the draft request for proposal (RFP) for the Polaris Government-wide Acquisition Contract (GWAC).

The Coalition is a non-profit association of firms selling commercial services, products, and solutions to the Federal Government. Our members collectively account for tens of billions of dollars of the sales generated through the GSA Multiple Award Schedules (MAS) program and IT GWAC's. Coalition members include small, medium, and large businesses that account for 40 percent of Federal IT spending, more than \$24 billion in Federal IT contracts, and more than \$145 billion in Federal Government contracts. The Coalition is proud to have worked with Government officials for over 40 years towards the mutual goal of common-sense acquisition.

The Coalition supports GSA's efforts to compete a new small business GWAC. The GWAC contracts are strategic assets to GSA and creating a small business program supports this important sector of our economy.

Section G.17.2 of the Polaris draft RFP contemplates a Vendor Risk Assessment Program (VRAP) that would assess and monitor supply chain risks for contractors. Once the VRAP is complete, the Government may audit contractors. The Coalition generally supports GSA's efforts to increase supply chain security in the Federal market. Prior to the release of the VRAP, the Coalition would sincerely appreciate the opportunity to engage with GSA about the VRAP to ensure that industry is educated about the new program and prepared for any potential contractor audits.

The Coalition has collected member feedback on the Polaris draft RFP which is included in the attached table. We appreciate GSA's consideration of this feedback and look forward to continued engagement on Polaris. If you need additional information or would like to discuss this feedback further, please feel free to contact me at [RWaldron@thecgp.org](mailto:RWaldron@thecgp.org).

Regards,

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

Roger Waldron  
President

Draft RFP Page Number	Draft RFP Section Number	Comments/Questions/Suggestions
9	C3 Innovative Solutions	<p>- Suggest expanding the list of innovative solution categories. Although innovative technologies are an important element of the Federal IT landscape, innovative IT Delivery methodologies are equally important. Recommend adding a subcategory in the innovative solutions area to include delivery methods such as cost-sharing; rapid certifications (e.g. ATOs), etc.</p> <p>- Current innovations for Polaris have a focus on data management and expansion of IT service delivery (distributed, automated, edge, etc.), with the Advanced and Quantum Computing category being the only one with an emphasis on Cybersecurity. President Biden’s American Rescue Plan contains over \$10 billion in cyber, IT related funding. The federal government and GSA will need to evaluate vendors that are demonstrating capabilities and services leveraging modern cybersecurity support services and technologies. There is a significant gap between current cybersecurity practices and the emerging technologies in POLARIS. Without such a differentiator, GSA will miss the opportunity to align this acquisition with the real federal cybersecurity needs as addressed by OMB and CISA. Innovative cybersecurity services include: Modern authentication, identity proofing and credentialing protocols, Behavioral threat analytics, Zero-trust implementations, Risk and fraud analytics, Zero knowledge proofs, Privacy enhancing, consent based shared services. We would recommend these categories replace or be added to the current list of Emerging Technologies as they better represent the actual needs of our customer.</p>
42	J	<p>-Please provide copy of draft Self Scoring Worksheet with values prior to final RFP release.</p> <p>- Will Task Order RFPs be advertised across the awarded pools, or will customers have to select one?</p>
49	L 5.1.3.1 Partnership or Joint Venture	The evaluation criteria should be structured to maximize competition among the most qualified firms.
50	L 5.1.3.1 Partnership or Joint Venture	<p>"Volume 4 - Offerors submitting as a joint venture must provide evidence of the system, certification, or clearance being in the name of the joint venture itself or in the name of every member of the joint venture. This applies to all systems, certifications, and clearances within section L.5.4. For certifications and clearances with varying levels (e.g. CMMI Levels 2 and 3), scoring will only be awarded for the levels that are in the name of the joint venture itself or have been met/exceeded by all members."</p> <p>This contradicts the October 16, 2020 SBA ruling 13 CFR 125.8 ( e ) stating "When evaluating the capabilities, past performance, experience, business systems and certifications of an entity submitting an offer for a contract set aside or reserved for small business as a joint</p>

		venture established pursuant to this section, a procuring activity must consider work done and qualifications held individually by each partner to the joint venture as well as any work done by the joint venture itself previously. A procuring activity may not require the protegee' firm to individually meet the same evaluation or responsibility criteria as that required of other offerors generally. The partners to the joint venture in the aggregate must demonstrate the past performance, experience, business systems and certifications necessary to perform the contract."
51	L 5.1.3.2 Proposed Subcontractors #3	-We recommend that both Relevant Experiences and Past Performances only come from the Prime Contractor. This way, the Prime is more fairly evaluated on their ability to support and deliver the quality of the proposed solutions. Adding multiple subcontractors increases the risk to the government.
52	Section L.5.1.4	GSA will allow an Offeror to take credit from an affiliate for any evaluation element. This is a best practice for Small Business (SB) IDIQs as it will result in more and higher quality bids from SBs. Unfortunately, many successful bidders, having leveraged affiliate credit at the GWAC-level will find themselves unable to bid at the task order level because task order Ordering Contracting Officers (OCOs) do not allow credit for affiliate evaluation elements. We understand that GSA is generally reluctant to restrict OCOs. However, we recommend that GSA consider requiring (or strongly recommending) in the Polaris contract (perhaps Section G.11) that OCOs accept affiliate credit in task order bids. We further suggest that GSA emphasize this requirement (or strong recommendation) in the Delegation of Procurement Authority training referenced in section G.2.2. If GSA accepts this suggestion the benefits to the Polaris program will include: <ol style="list-style-type: none"> <li>1) More SB bids at the task order level</li> <li>2) Higher quality SB bids at the task order level</li> <li>3) Fewer Polaris primes who bid rarely, if at all, after being awarded the GWAC</li> <li>4) More incentive for primes to bring work to Polaris</li> <li>5) Little to no additional risk compared to accepting credit from other third parties since affiliates are controlled by a single entity</li> </ol>
59	L.5.2.2.2 Primary Relevant Experience Project Size and Complexity	Suggest differentiating experience through sole source awards awarded through the 8(a) program versus opportunities awarded on competition by using \$4 Million as the first cap rather than \$5 Million.
61	L.5.2.2.8 Primary Relevant Experience Project including Cloud Services	The definition of cloud services should not only reference cloud computing but also cloud-related IT professional services that are focused on providing the types of services that support the Government's adoption of migration to or governance/management of Cloud computing. This would include support activities associated

		with assessing Cloud solutions, refactoring workloads for Cloud solutions, migrating legacy or other systems to Cloud solutions, providing management/governance of Cloud solutions, DevOps, developing cloud native applications or other Cloud oriented activities.
78	Attachment J-2 - Labor Category Descriptions.	"Labor categories are further subdivided by knowledge/skill level." The descriptions as provided are vague and not well defined with any details for education level, years of experience, etc. Is this information provided somewhere else? If there are hard requirements for education / years of experience, can degrees be substituted for years of experience, can certs count to years of experience, etc.?