

Special GSA Presentation on OASIS SB On-Ramp

On July 12, GSA provided a half-day presentation to Colorado small businesses on OASIS SB and the upcoming on-ramp activities. GSA provided a copy of the [Presentation](#) and "[Cheat Sheet](#)" handed out to the attendees. I also encourage you to read the [OASIS Position Paper](#) that details the impacts on the small business community for background.

1. Upcoming Schedule

- In accordance with paragraph H15 of the OASIS SB contract, there will be an on-ramp of various pools in early 2019 with an anticipated award date of April 20, 2019. The full schedule is on slide 7 of the presentation.
- Pools 1, 3 & 4 will definitely be competed.
 - GSA anticipates many companies in Pools 1, 3 & 4 will graduate (significantly more than half).
 - They are still assessing the other pools.

2. OASIS SB Competition Goals

- The goal is to have 3-5 companies competing for each task order. They want at least 3 for adequate competition while evaluating 10 proposals is unmanageable.
- Small businesses with current OASIS SB contracts are being assessed to determine if they will still qualify as small. All contract holders must re-certify their size status for the next 5-year ordering period.
 - If too large, then they may vertically transfer to the OASIS full and open
 - If still small, they may be eligible to laterally transfer to other pools if now eligible.

3. OASIS SB History and Purpose

- OASIS SB was created to help our customers and they love the flexibility provided by OASIS SB.
 - There is a definite tension between the needs of the USG acquisition process and the impact on the number of opportunities available to Small Businesses.
 - While GSA correctly pointed out the large amount of dollars going to small businesses, the concern is that the number of small businesses receiving contracts is significantly less.
- OASIS is unique in that it can support a wide range of services and contract types (including time-and-material and cost reimbursement)
- GSA created 7 pools because the government contract system only allows one size standard per contract. Each pool reflects a specific size standard for

the related services. If one contract has requirements across multiple pools, then CO picks the one most suited with that size standard.

- GSA created the “Highest Technically Rated with Fair and Reasonable Prices” as the evaluation criteria. This is not a best value trade off. Despite the uniqueness of the evaluation criteria, GSA survived 38 protests against the first evaluation.
- Limitation of subcontracting is managed at the overall contract level and not at the task order level. So, an individual task order can be subcontracted in its entirety. This grants the customer significant flexibility.

4. On Ramp Evaluation Criteria

- Same as the first OASIS SB competition:
 - Highest Technically Rated with Fair and Reasonable Prices
 - Discussions are not anticipated (while allowed, GSA warned repeatedly that they did not have discussions in round 1 and not to anticipate discussions in round 2).
 - Be clear and complete in proposals
 - Apply same requirements as first OASIS SB consistent with terms of OASIS SB contract. See Slides 24-29
 - 2 Prime Federal contracts in same NAICS code with at least a past performance record of 3.
 - Approved Accounting System
 - GSA is assessing if it will allow third party audits and will announce soon.
 - Relevant Experience. See Slide 31
 - Past Performance
 - JVs add complexity. If a JV is the offeror, then only the JVs past performance can be evaluated and not the past performance of the individual members. If the FAR implements the SBA regulations mandating consideration of individual members before the proposal is released, then GSA will follow the new rules.
 - ID/IQ contracts – only include the individual task orders and not the overarching ID/IQ. May count task orders individually or group to meet dollar thresholds.
 - Companies may rely past performance history upon JV (if they were a member) or ANC corporate company if there is a “meaningful commitment letter”
 - Teaming Arrangements – only JVs will be considered and not Prime/Sub teams.
 - They are seeking HUBZones. See Slide 22.
 - GSA also referred to protest that was sustained when an agency relaxed competition requirements as rationale for why it will not

change eligibility criteria for this on-ramp. *National Air Cargo Group, Inc. v. United States*, 126 Fed. Cl. 281 (Apr. 28, 2016).

- Ask your questions!!! They encouraged us to re-ask questions on past performance and eligibility.

5. OASIS II

- GSA recognizes difficulties created by some of the eligibility criteria and may make changes for OASIS II but not for this on-ramp.
- GSA will not create OASIS II for 2019 and use in lieu of this on-ramp.
- Considering OASIS II for 2024 but not guaranteed.

6. What Can You Do

- If eligible, compete with a well-written proposal and highly competitive rates.
- If not eligible, market to the various prime contractors.
 - Be ready to negotiate
 - Consider potential strategies in advance to leverage any unique technologies or services
- Reach out to your Congressional representatives to let them know about the impact of OASIS SB on your local small business community. Provide them with the facts showing how much business is being lost and who is receiving it.
 - Connect with other small businesses in your community
 - Obtain data from GSA
 - Colorado's Senators Bennett and Gardner have been great advocates and can work with your state's representatives
 - PatchPlus has a wonderful [presentation](#) with good data.
- Specific Points to Push
 - OASIS and similar multiple award contracts have a negative impact on the opportunities for small businesses. While agencies meet or exceed small business goals in regard to the amount of dollars, the dollars are being funneled to fewer small businesses.
 - For OASIS, push GSA to replace with an improved OASIS SB and not allow more on ramps after 2019.

Side Notes: GSA dispelled the rumor that the Professional Services contracts are going away. It is not going away.