



U.S. General Services Administration

# Federal Acquisition Service

## The GSA MAS Program: Buying Services Through GSA Schedules

## Course Sponsor Slide

# This course is sponsored by the **GSA Federal Acquisition Service**

in association with the Federal Acquisition Institute





## Agenda

- Introduction
- TOPIC 1: What is MAS all about?
- TOPIC 2: What can MAS do for your organization?
- TOPIC 3: What can I buy?
- TOPIC 4: How do I acquire services through MAS?
- TOPIC 5: What are the benefits of BPAs and CTAs?
- TOPIC 6: Other Considerations for Service Acquisitions
- Additional Resources
- Interact Blogs
- Webinars & Online Training
- Questions & Answers



## Course Objectives

By the end of this course, you should be able to:

- ❑ Describe the purpose and benefits of the Multiple Awards Schedule (MAS) program
- ❑ Describe the MAS program and its applicable FAR guidance
- ❑ Describe processes used by ordering activities prior to placing an order for Schedule services
- ❑ Recognize procedures and requirements related to ordering Schedule services
- ❑ Identify how to use Blanket Purchase Agreements (BPAs) and Contractor Team Arrangements (CTAs) in ordering Schedule services
- ❑ Identify additional considerations for ordering Schedule services



**Topic 1:**  
*Introduction to the MAS Program*

# What is MAS all about?



## What Is a Multiple Award Schedule?

- ❑ Governmentwide contract vehicle for **commercial** products, services, and solutions
- ❑ Also known as “Federal Supply Schedule (FSS),” “GSA Schedules” or “MAS”
- ❑ Standing solicitation posted on FedBizOpps on beta.SAM.gov
- ❑ Awarded using FAR Part 12 procedures



## MAS Contract Characteristics

- ❑ Multiple Award IDIQ (5 year base, three 5 year options)
- ❑ Fixed Price Economic Price Adjustment (EPA)
- ❑ Fair and reasonable pricing
  - Price reductions can be requested and may be applied at the order level.
- ❑ Performance requirements established at the order level to meet the customer's specific needs

# The Federal Acquisition Regulation (FAR)

FAR	Provides	Applicability
Subpart 8.4	Ordering procedures for GSA Schedules	Federal Government Ordering Activities
Part 12	Acquisition of Commercial Items	GSA awards Schedule contracts under Part 12
Subpart 6.102(d)(3)	Defines orders placed against Schedules as a competitive procedure	All

## FAR Parts Applicable to Schedules Orders

FAR	Title	Applicable
Part 7	Acquisition Planning	YES
Part 10	Market Research	YES
Subpart 17.5	Interagency Acquisitions	YES
Subpart 33.1	Protests	YES
Subpart 37.6	Performance Based Acquisition	YES
Part 39	Acquisition of Information Technology	YES



## FAR Parts Not Applicable to Schedules Orders

FAR	Title	Applicable
Part 13	Simplified Acquisition Procedures	NO (except allows for MAS BPAs)
Part 14	Sealed Bidding	NO
Part 15	Contracting by Negotiation	NO
Part 19	Small Business Programs	NO (except Bundling)
Part 36	Construction and A&E	NO



## Topic 2: *Benefits of the MAS Program*

# What can MAS do for your organization?



## FAR Subpart 8.4 Simplifies the Acquisition Process

In contrast to FAR Part 15, *Contracting by Negotiation*, Schedule orders do not require:

- ❑ Conducting a formal “negotiated procurement” (Source Selection Evaluation Board (SSEB))
- ❑ Issuing a “solicitation” for thirty days (or any other pre-determined time)
- ❑ Conducting a “competition” by seeking contractors outside the Schedules program
- ❑ Synopsizing the requirement on FedBizOpps, unless it’s a limited sources acquisition over the SAT
- ❑ Conducting “discussions”
- ❑ Conducting formal “debriefings” or “competitive range determinations”
- ❑ Using FAR Subpart 15.3 concepts and procedures



## GSA Schedules Conform with Competitive Contracting

Schedule users shall not:

- ⊘ Seek further competition outside of the MAS program
- ⊘ Synopsise the requirement (unless Sole-Source greater than SAT with an LSJ – See 8.404(g))

# Ordering Procedures – FAR 8.405-1

When ordering supplies or fixed-price services w/out SOW

**Exceeds SAT**

- Develop RFQ
- Receive  $\geq 3$  quotes - use of eBuy meets fair notice
- Limited Sources Justification if applicable
- Seek price reduction
- May not place orders orally
- Best value determination

**Micro – SAT**

- Survey  $\geq 3$  contractors
- Limited Sources Justification if applicable
- Determine if a price reduction should be sought
- Best value determination

**Below Micro**

- Place order with contractor
- Distribute orders among contractors

# Ordering Procedures – FAR 8.405-2

When ordering services requiring an SOW

**Exceeds SAT**

- Prepare SOW and establish evaluation criteria
- Receive  $\geq 3$  quotes – use of eBuy meets fair notice
- Limited Sources Justification if applicable
- Seek price reduction
- Best value determination
- Overall price reasonableness determination (consider mix of labor and level of effort)
- May not place orders orally

**Micro – SAT**

- Create SOW and evaluation criteria
- Issue RFQ to  $\geq 3$  contractors
- Limited Sources Justification if applicable
- Distribute orders among contractors
- Best value determination
- May not place orders orally

**Below Micro**

- Place order with contractor
- Distribute orders among contractors
- May not place orders orally



**Topic 3:**  
***Types of Schedules and  
Characteristics***

**What can I buy?**

# Did you know...

- ❑ GSA offers over 40 million supplies and services on one Consolidated GSA Schedule
- ❑ 10 open and standing solicitations published on FedBizOpps (including 9 managed by VA)
- ❑ Over 17,000 Schedule contracts
  - 80% are small businesses.
  - Orders and BPAs may be set aside for small businesses.
- ❑ \$48.2 billion total in annual spending (including VA) for FY19

## Services Available on Schedules

The GSA MAS program provides access to a vast range of commercial services. ***Did you know, for example, that Schedule services can be used for...?***

- Recycling computer monitors
- Food service for soldiers in Afghanistan
- Agency reorganizations, even GSA's
- Aircraft electronic maintenance
- Acquisition support
- Sign language
- Redesigning avionics for Army helicopters



## Services Available on Schedules, Cont.

GSA Consolidated Schedule is now Organized by Large Category, Sub Category and NAICS Based SINs

Large Categories (Based on Category Management):

<b>Facilities</b>	<b>Office Management</b>
<b>Furniture and Furnishings</b>	<b>Professional Services</b>
<b>Human Capital</b>	<b>Scientific Management and Solutions</b>
<b>Information Technology</b>	<b>Security and Protection</b>
<b>Industrial Products and Services</b>	<b>Transportation and Logistics Services</b>
<b>Miscellaneous</b>	<b>Travel</b>

Within each large category are subcategories:

<b>Professional Services</b>	<b>Business Administrative Services</b>
	<b>Environmental Services</b>
	<b>Financial Services</b>
	<b>Identity Protection Services</b>
	<b>Marketing and Public Relations</b>
	<b>Technical and Engineering Services</b>



## Services Available on Schedules, Cont.

GSA Consolidated Schedule is now Organized by Large Category, Sub Category and NAICS Based SINS

Within each subcategory are the new NAICS Based SINS:

Large Category	SubCategory	SIN	SIN Title
<b>Professional Services</b>	Environmental Services	562112	Hazardous Waste Disposal Services
		562910REM	Environmental Remediation Services



## Services Available on Schedules, Cont.

GSA Services include:

<b>Professional Engineering Services (PES)</b>	<b>Financial and Business Solutions (FABS)</b>
<b>Logistics (LOGWORLD) Worldwide Services</b>	<b>Advertising and Integrated Marketing Services</b>
<b>Language Services</b>	<b>Information Technology Services</b>
<b>Environmental Services</b>	<b>Security Solutions</b>
<b>Management and Consulting Services</b>	<b>Disaster Relief Services</b>
<b>Business Integrated Services</b>	<b>Temporary Administrative and Professional Services</b>
<b>Facilities Maintenance and Management</b>	<b>Professional and Allied Healthcare Staffing Services</b>

- Services can be found in each of the 12 Large Categories
- For a comprehensive list of services, please visit [GSA eLibrary](#).



**Topic 4:**  
*The Basics of Buying*

**How do I acquire services  
through MAS?**



## Pricing and Limitations on Schedule Services

Under the Schedules program, two types of pricing for services are used:

- Fixed Price
- Hourly Rate

The following are not accommodated under the Schedules program:

- Architect/Engineer Contracts (FAR 36.601-4)
- Cost-Reimbursement Type Contracts (FAR 16.3)
- Construction Contracts (FAR 2.101), except for Ancillary Repair and Alteration under limited conditions

# FAR 8.002 - Priorities for Use of Mandatory Government Sources

*\*In descending order*

Supplies*	Services
Agency Inventory	Services that are on the Procurement List maintained by the Committee for Purchase From People Who Are Blind or Severely Disabled (Ability One)
Excess from other agencies	
Federal Prison Industries	
Supplies that are on the Procurement List maintained by the Committee for Purchase From People Who Are Blind or Severely Disabled (Ability One)	
Wholesale Supply Sources (GSA / DLA)	



## FAR 8.004 – Use of other sources

If Agencies are unable to satisfy requirements through mandatory sources they are encouraged to consider satisfying requirements through the following non-mandatory sources before considering commercial sources in the open market.

Supplies*	Services*
Federal Supply Schedules	Federal Supply Schedules
Governmentwide Acquisition Contracts	Governmentwide Acquisition Contracts
Multi-Agency Contracts	Multi-Agency Contracts
Other contracts or BPAs intended for Governmentwide use, i.e. Federal Strategic Sourcing Initiative (FSSI)	Other contracts or BPAs intended for Governmentwide use, i.e. Federal Strategic Sourcing Initiative (FSSI)
Wholesale Supply Sources	Wholesale Supply Sources
	Federal Prison Industries

**\*Not listed in any order of priority**



## Acquisition Process for MAS Services

When using MAS to acquire services, these are the milestones for each acquisition cycle:

- Acquisition Planning as required by FAR Part 7.105
- Market Research as required by FAR Part 10.001; market research can help identify:
  - ❖ The most advantageous (“best”) procurement vehicle consistent with FAR 8.404
  - ❖ The Schedule contractors who are capable of performing the required service
  - ❖ The number of Schedule contractors interested in the opportunity
  - ❖ GSA eTools provide access to valuable resources for performing market research.



## Acquisition Process for MAS Services, Cont.

When using MAS to acquire services, these are the milestones for each acquisition cycle:

- Communicating the Need for Services; i.e. the RFQ
- Describe the Work:
  - ❖ Performance Work Statement (PWS)
  - ❖ Statement of Objectives (SOO)
  - ❖ Statement of Work (SOW)

But how do we determine when to use a SOW/PWS/SOO or not?

## Basic Question #1: Whether an PWS/SOW Is Used

Ask: What type of service is being acquired?

- Fixed price services do not require the use of an PWS/SOW as part of the RFQ
- An PWS/SOW is required if an agency is acquiring hourly rate services



*Note: The term SOW encompasses a traditional SOW as well as performance-based documents (PWS and SOO)*

## Basic Question #2: The Dollar Amount of the Order

There are three “thresholds” related to the dollar amount of the order:



- Below the micro-purchase threshold, currently \$10,000\*\*
- Above the micro-purchase threshold but below the simplified acquisition threshold (SAT), currently \$250,000
- Above the SAT



## Documentation When an PWS Is NOT Required

When ordering without an PWS, the following documentation is required:

- Identification of the Schedule contracts considered and the contractor chosen
- Description of the service purchased and the order amount paid
- When exceeding the SAT, evidence of compliance with ordering procedures
- The basis for the award decision
- When exceeding \$550,000, determination that the use of the Schedule constitutes the best approach



## Documentation When an PWS IS Required

For orders requiring an PWS, the following documentation is required:

- Identification of the Schedule contracts considered and the contractor chosen
- Description of the service purchased and the order amount paid
- The evaluation methodology used to select the contractor that received the order
- The rationale for any tradeoffs in making the selection
- Determination of overall price reasonableness
- Rationale for using other than firm fixed-price or PBA, if applicable
- When exceeding the SAT, evidence of compliance with ordering procedures
- When exceeding \$600,000, determination that use of the Schedule constitutes the best approach (reference FAR 8.404(b)(2))



## Advisory and Assistance Services

A final consideration when planning the acquisition is usage of Advisory and Assistance Services. These are classified in one of the following definitional subdivisions:

1. Management and professional support services
2. Studies, analyses and evaluations. Included are studies in support of R&D activities
3. Engineering and technical services



## Advisory and Assistance Services, Cont.

FAR 37.2 states that agencies may contract for advisory and assistance services to:

- ❖ Obtain outside points of view, advice, opinions, or special knowledge or skills
- ❖ Enhance the understanding of, and develop alternative solutions to, complex issues
- ❖ Support and improve the operation of organizations or systems (managerial or hardware)

The FAR part also outlines **circumstances** in which advisory and assistance services cannot be acquired and used.



## Limited Sources Justification and Approval

- ❑ FAR 8.405-6
  
- ❑ Schedule orders are exempt from FAR Part 6.
  
- ❑ Ordering activities must justify restricting consideration when:
  - Restricting to fewer contractors than required per 8.405-1 and 8.405-2
  
  - Limiting to brand name



## Limited Sources Justifications

- An urgent and compelling need exists, and following the procedures would result in unacceptable delays.
- Only one source is capable of providing the supplies or services required at the level of quality required because the supplies or services are unique or highly specialized.
- The new work is a logical follow-on to an original MAS order, provided that the original order was a competitive Schedule order.
- See FAR 8.405-6(d) for monetary thresholds and approval requirements.

# Limited Sources Justification (LSJ) Requirements

## Limited Source Order/BPA (8.405-6(a))

Threshold	LSJ Required	Posting Required
Exceeds SAT	Yes	Yes
Micro – SAT	Document Circumstances – not a full blown LSJ	No
Below Micro-Purchase	No	No

Posting requirements: Within 14 days after placing an order or establishing a BPA exceeding the simplified acquisition threshold that is supported by a limited-sources justification the ordering activity shall:

- Publish a notice in accordance with FAR Subpart 5.301 and
- Post the justification:
  - At [www.fedbizopps.gov](http://www.fedbizopps.gov) and
  - On the Web site of the ordering activity agency, which may provide
  - access to the justification by linking to FedBizOpps and
  - For a minimum of 30 days.

## Limited Sources Justification (LSJ) Requirements, Cont.

### Brand Name (8.405-6(b))

Threshold	LSJ Required	Posting Required
Exceeds SAT	Yes	Yes - eBuy
\$25k – SAT	Document Circumstances – not a full blown LSJ	Yes - eBuy
Micro - \$25k	Document Circumstances – not a full blown LSJ	No
Below Micro-purchase	No	No

Posting requirements: The ordering activity shall post the following information along with the Request for Quotation (RFQ) to e-Buy:

- For proposed orders or BPAs with an estimated value exceeding \$25,000, but not exceeding the simplified acquisition threshold, Contracting Officer shall document the file.
- For proposed orders or BPAs with an estimated value exceeding the simplified acquisition threshold, Limited Sources Justification.
- Example: AINS Inc Award for FOIA Software and Support (SEC)

# Limited Source Justification Approval Requirements

Exceeding \$75 Million  
(\$100M NASA, DOD, USCG)

- Approval of Agency senior procurement executive

\$15 Million - \$75 Million  
(\$100M NASA, DOD, USCG)

- Head of the ordering activity
- (or his designee above the grade of GS-15 or a military flag officer)

\$750,000 - \$15 Million

- Approval of OA competition advocate or head of the ordering activity
- (or his designee above the grade of GS-15 or a military flag officer)

Up to \$750,000

- Ordering activity (OA) contracting officer certification that justification is accurate and complete to best of their knowledge and belief.

# Acquisition Planning Packages



GSA has recently published Acquisition Planning Packages for products and services such as:

- Facilities
  - Building Maintenance and Operations
  - Facilities Maintenance and Repair
  - Prefabricated Building
- Office Management
  - Furniture
  - Office Supplies
  - Print Management
- Security and Protection
  - Guard Services
  - Alarm & Signal Systems
- Information Technology
  - Hardware
  - Security
  - Services
  - Software (including Cloud)
  - Telecommunications
- Professional Services
  - Business Administration Services
  - Financial Services
  - Legal Services
  - Management & Advisory Services
  - Marketing & Public Relations
  - Research and Development
  - Social Services
  - Technical and Engineering Services



## Acquisition Planning Packages

Acquisition Planning Packages includes resources such as

- Buyers Guides
- Market Research Tools & Templates
- Sample Requests for Information (RFI)
- RFQ Task Order Template
- RFQ BPA Template
- Sample RFQ Evaluation Factors
- Sample Performance Work Statements / Statements of Work

<https://www.gsa.gov/buying-selling/new-to-gsa-acquisitions/how-to-buy-through-gsa/acquisition-planning-package-overview>

## Awarding Task Orders for Schedule Services

A number of factors can be considered when awarding a task order. The three major areas are:

- ❖ Past Performance/Experience of a Contractor
- ❖ Reasonable Pricing
- ❖ Best Value Factors





## Administering Task Orders for Schedule Services

- ❑ Inspection and Acceptance of Schedule Orders
  - Quality Assurance Surveillance Plan (QASP) or the Inspection of Services
  - See FAR 8.406-2 for more information
  
- ❑ Terminations of Schedule Orders; there are two types of terminations that may be applied to individual orders for services:
  - Terminating for Cause
  - Terminating for the Government's Convenience



## Options

Options and Schedule Orders; may be exercised on Schedule contract orders, provided that:

- FAR clause 52.217-9 is completed and provided in the RFQ.
- Funds are available.
- The requirement covered by the option fulfills an existing Government need.
- Prior to exercising an option, the ordering activity ensures that it is still in the Government's best interest, with price and other factors considered.
- The period of performance for order options does not go beyond 60 months past the expiration date of the MAS Contract ordering period (reference FAR 52.216-22(d) in the MAS Contract).



**Topic 5:**  
*Using BPAs and CTAs for  
Service Acquisitions*

**What are the benefits of BPAs and CTAs?**

# Contract Flexibilities



**Contractor Team Arrangement (CTA)**

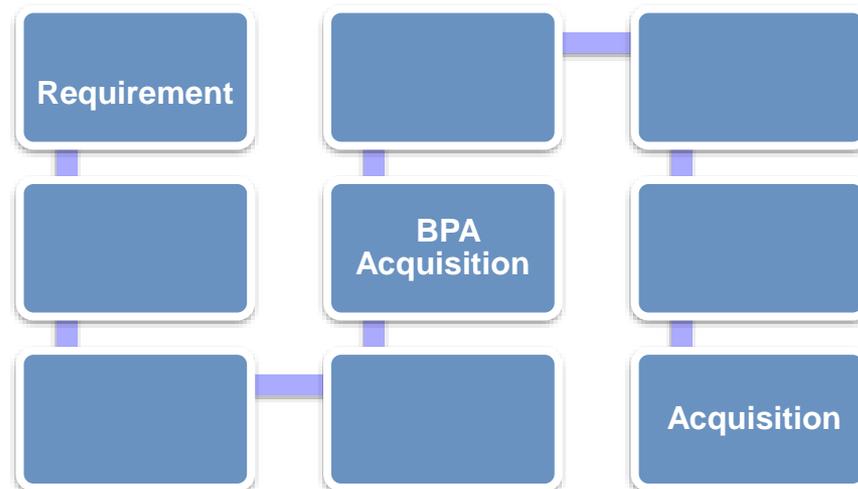


**Blanket Purchase Agreement (BPA)**

## BPA Streamline the Acquisition Process

### MAS Blanket Purchase Agreement (BPA):

- ❑ Enables strategic sourcing of agency and multi-agency requirements
- ❑ Eliminates need for immediate funding requirements
- ❑ No ceiling only an estimated value



## Blanket Purchase Agreements Benefits

- ❑ Opportunity to negotiate improved discounts
- ❑ Satisfy recurring requirements
- ❑ Leverage agency requirements
- ❑ Quicker turnaround on orders
- ❑ Funding isn't required until a BPA order is initiated.
- ❑ Can use small business set-aside procedures in BPA awards to help meet socioeconomic goals



## Single- and Multiple-Award BPAs

There are two kinds of BPAs that an ordering activity can establish:

- ❖ A Single-Award BPA is awarded to a single vendor. When a service (or item) is needed, the authorized user contacts that BPA holder and places an order.
- ❖ Multiple-Award BPAs are awarded to multiple contractors. When an order is placed, each contractor must be given the opportunity to submit a quote. This is very much like the “fair opportunity” process used in FAR Part 16 for multiple-award IDIQ contracts.



## Single-Award BPAs

- ❑ FAR stated preference for multiple awards
- ❑ Single-Award BPA limited to 1 year, no more than 4 option years; documented justification and approvals required
  - Initial award >\$100M must be approved by the head of the agency (See 8.405-3(a)(3))
- ❑ Benefits:
  - Simplified ordering process
  - Improved pricing and terms





## Multiple-Award BPAs

- ❑ All purchases are competed among a prequalified pool of contractors.
- ❑ Duration generally does not exceed 5 years, but may do so to meet program requirements.
- ❑ For orders over the micro-purchase threshold all BPA holders must be given fair opportunity to be considered.
- ❑ For orders over the SAT provide RFQ to all BPA holders.
- ❑ Benefits:
  - Simplified ordering process
  - Improved pricing and terms
  - Ability to search and negotiate for best value





## The “Multi-Agency” BPA

- The ordering activity may set up a Schedule BPA so that the multiple agencies may order against the BPA directly with the Schedule contractor(s).
- The ordering activities eligible to use the BPA(s) should be clearly identified in the original BPA document, and each should define and consolidate its estimated requirements to obtain greater discounts.
- For “Best Value,” the BPA must reflect the requirements of all users with an estimate of the total quantity.
- Continuous competition benefits the Government.

## Basis for Establishment

- ❑ BPAs are established considering price and non-price factors, always best value
  
- ❑ Typical best value factors for services:
  - Technical Approach
  - Experience
  - Past performance





## Number of BPAs to Establish in a Multiple-Award Environment

### Factors to consider:

- Scope and complexity
  - Benefits of ongoing competition
  - Administrative costs
  - Technical qualifications
- Document the rationale in the acquisition plan or file.



## Establishing a Schedule BPA: Basic Information

- Statement that it is a Schedule BPA
- Statement that it is issued IAW FAR 8.405-3
- Identification of the issuing organization
- Identification of the contractor
- BPA award period shall not exceed the period of the Schedule contract including option year period(s)

# MAS BPA Establishment Procedures – FAR Subpart 8.405-3(b)(1)

When Establishing BPAs for supplies or fixed-price services w/out PWS



**Exceeds SAT**

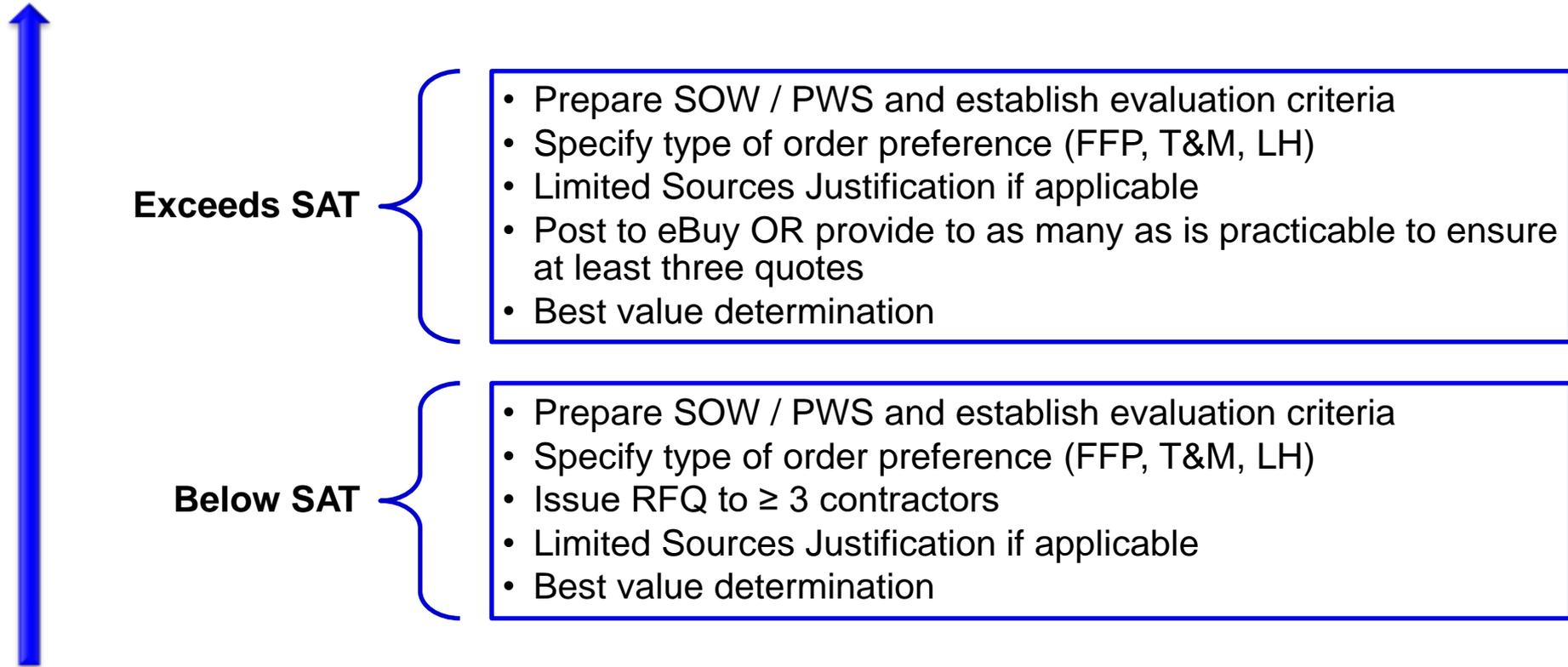
- Develop RFQ, including basis of award
- Post to eBuy OR provide to as many as is practicable to ensure at least three quotes
- Limited Sources Justification if applicable
- Best value determination

**Below SAT**

- Survey  $\geq 3$  contractors (GSA Advantage, catalogs, etc.)
- Limited Sources Justification if applicable
- Determine if a price reduction should be sought
- Best value determination

# MAS BPA Establishment Procedures – FAR Subpart 8.405-3(b)(2)

When Establishing BPAs for services requiring an PWS



## BPA's and Small Business

- ❑ Set-asides may be conducted at the BPA or order level.
- ❑ Must establish ordering procedures at the BPA level; do not conduct order level set-asides without prior notice.
- ❑ When establishing and ordering against BPAs, ordering activities may consider socioeconomic status.



## Contractor Team Arrangement (CTAs)

CTAs were created as a result of Federal customers seeking Schedule solutions to large, complex requirements.

Often, agencies require a mix of services (and/or supplies) that are not offered under one Schedule or by one single contractor. Using CTAs is a way to address these needs, incorporating services into a single, total solution.



**Contractor Team  
Arrangement (CTA)**



## Benefits of CTAs

CTAs offer substantial benefits for the ordering activity:

- Facilitate meeting their needs with a single, total solution
- Extend their ability to fulfill multifaceted requirements
- Reduce the number of separate buys and contracts they must manage
- May reduce the need for open market items
- Promote satisfying their socioeconomic procurement goals
- Increase competition, which can lead to better solutions and pricing
- Overall, minimize acquisition costs

## Key Differences between CTAs and Subcontractor Arrangements

Key Questions	CTA	Prime/Sub Arrangement
Who must hold the Schedule contract?	Each member	Only prime contractor
Who is considered a party to the task order? (privity)	Each member	Only prime contractor
Who has ultimate responsibility for contract duties?	Each member	Only prime contractor
What rates can be charged?	Up to the MAS rate for member providing the services	Up to the MAS rate for the prime contractor
FPDS reporting	Member with the greatest revenue on the order	Only prime contractor



## Ordering Activities' Responsibilities in the Use of CTAs

Ordering activities have a responsibility to review a CTA document so they have a clear understanding of how the arrangement will work. Remember, the ordering activity is buying the services of the team, not a prime-subcontractor relationship.

In reviewing the CTA document, ordering activities should examine:

- Team member responsibilities; which team member is responsible at each phase of the project (to ensure proper coordination and cooperation)
- Deficiencies in the CTA (to enhance the probability of successful performance)
- Proposed fixed prices/hourly rates and terms and conditions (for consistency with MAS contracts)
- Conditions as specified in the RFQ



**Topic 6:**  
*Other Considerations for  
Service Acquisitions*



## Determining Price Reasonableness

When buying services, IAW FAR 8.405-2, the ordering activity is required to conduct an overall price reasonableness determination which includes:

- Consideration of proposed mix of labor and level of effort to ensure that the overall price provides the best value to the Government
- IGE: the ordering activity should also examine the contractor's proposed amounts against the Independent Government Estimate (IGE)
- Travel Costs
- Other Direct Costs

# Other Direct Costs Categories



Ancillary Supplies and Services

- Commercial items on Schedule
- Items included in the task order
- Items support and are not the primary purpose of the order

- Travel in the performance of a task order
- Reimbursable according to agency and Federal regulations



Travel Reimbursable Items



Open Market Items

- Open Market Items (OMI) are commercial items not priced on the Schedule Contract
- OMI are subject to FAR 8.402(f)
  - FAR parts 5, 6, and 19 procedures applicable
  - Additional clauses may be applicable
  - Must determine prices fair and reasonable
  - OMI must be within scope of the Schedule





## Inherently Governmental Functions

When acquiring services, it is important to consider “inherently governmental functions” that must be performed by the Government (FAR Subpart 7.5). Some examples of functions considered to be inherently governmental are:

- Determining what supplies or services are to be acquired by the Government
- Participating as a voting member on any source selection boards or performance evaluation boards
- Approving any contractual documents, such as requirements, incentive plans and evaluation criteria
- Awarding and administering contracts
- Terminating contracts
- Determining whether contract costs are reasonable, allocable, and allowable



## Small Businesses and Schedule Orders

GSA strongly supports the participation of small business concerns in the GSA Schedules program. As such, GSA supports orders to small business Schedule contractors in these categories:

- Small business
- Veteran-owned small business
- Service-disabled veteran-owned small business
- HUBZone small business
- Women-owned small business
- Economically disadvantaged women-owned small business
- Small disadvantaged business



## Small Businesses in Schedule Orders, Cont.

Under FAR Subpart 8.4, acquisitions, including those for services, may be set aside for small businesses solely at the Contracting Officer's discretion.

In addition to set-asides, Contracting Officers have two other means to promote small businesses under FAR Subpart 8.4:

- When the value is under the simplified acquisition threshold, they can choose to solicit only small businesses (or sub-categories of small businesses).
- They can choose to make socioeconomic status a best value evaluation factor.

*\*Ordering activities should utilize GSA eLibrary and GSA eBuy to identify small businesses*

## Meeting Agency Goals: Environmental Sustainability

- ❑ “Sustainable acquisition” refers to purchasing products with specific environmental or energy attributes.
- ❑ Federal agencies are required by statutes and executive orders to purchase certain products with these attributes.
- ❑ It includes the purchase of services under which “sustainable” products will be supplied or used.
  - Janitorial services contracts usually require the contractor to supply paper towels, toilet paper, and plastic trash can liners, from recycled materials.



## Environmental Program Scope, Cont.

Examples of “green” services are:

- Janitorial Services
- Materials and Waste Recycling & Disposal
- Energy audits
- Green meetings

Visit

[www.gsa.gov/gogreen](http://www.gsa.gov/gogreen)

for a list of products and services.

### GSA: Strategically Sustainable

GSA will eliminate its impact on the natural environment and use its government-wide influence to reduce the environmental impact of the federal government. – GSA Sustainability Plan

The agency unveils ambitious plan to reduce the environmental impact of the federal government and work to eliminate its own carbon footprint. [Read the plan](#)



#### SUSTAINABLE SOLUTIONS

Opportunities for change available now:

► [Business Solutions for Sustainable Acquisition](#)



#### A PROVING GROUND FOR INNOVATION

Learn how GSA is developing and evaluating green technologies and practices:



#### FULFILLING THE PROMISE

Leadership by example: GSA initiatives are catalysts for change:

[News](#)



## Interagency Acquisitions

- ❑ Interagency acquisitions are commonly conducted through indefinite-delivery contracts, such as task and delivery order contracts
- ❑ Most frequently used are Federal Supply Schedules (FSS), Governmentwide Acquisition Contracts (GWACs) and Multi-Agency Contracts (MACs)
- ❑ FAR 17.502-1(a)(2) requirement for Best Procurement Determination no longer applies per Section 875 of the National Defense Authorization Act for FY 2019

Until the FAR requirement is removed via implementation of FAR Case 2018-015, for Civilian Agencies, reference CAAC Class Deviation Letter 2018-04



## DoD Requirements for Using Schedules

- ❑ DoD controls interagency acquisitions, including Schedule orders, at even lower dollar amounts
- ❑ When an order exceeds the SAT, DFARS 217.770 provides for special review and approval. This includes:
  - ❖ Evaluating whether using a non-DoD contract for the acquisition is in the best interest of DoD
  - ❖ Determining that the tasks or supplies are within the scope of the contract used
  - ❖ Reviewing funding to ensure it is used in accordance with appropriation limitations
  - ❖ For assisted acquisitions providing unique terms, conditions and requirements to the assisting agency for incorporation into the order or contract to comply with all applicable DoD-unique statutes, regulations, directives and other requirements
  - ❖ Collecting and reporting data on the use of assisted acquisition for analysis



## DoD Requirements for Using Schedules, Cont.

DFARS 208.404, states that if only one offer is received to a competitive solicitation and the order exceeds the SAT, the Contracting Officer must provide special consideration to:

- Potentially re-soliciting to allow for a 30-day response period if fewer than 30 days was initially allowed; and
- Providing additional analysis regarding price reasonableness

See DoD Class Deviation 2014-O011 to FAR 8.404(d) which requires a fair and reasonable price determination for individual orders, BPAs and order under BPAs.

See July 31, 2015 DPAP Memorandum “Proper Use of GSA Federal Supply Schedule Contracts-A Reminder”

In addition to DFARS guidance on Schedule use in DoD, each Service/Department issues their own implementing guidance.

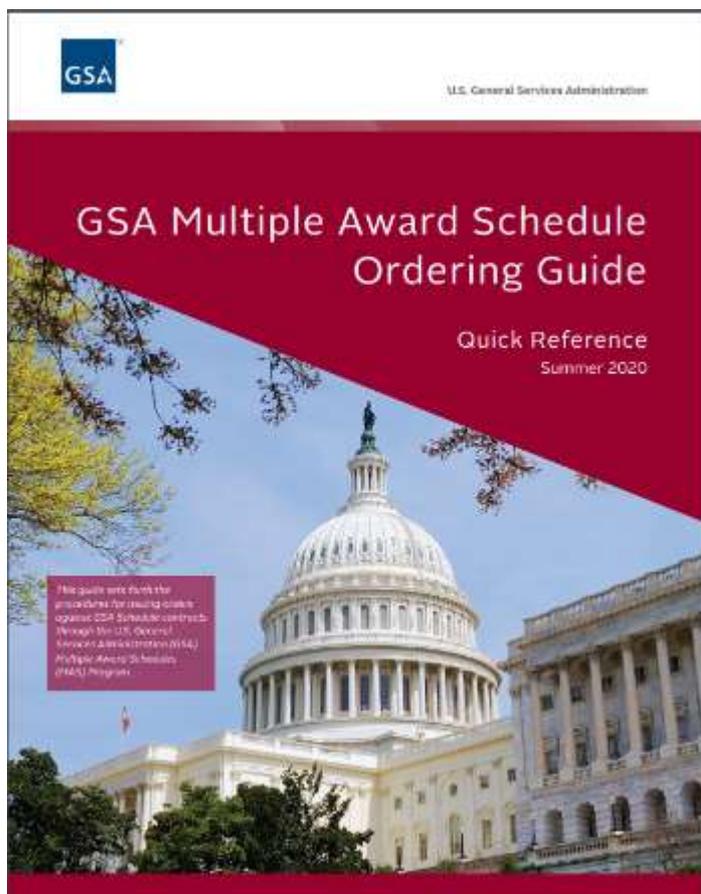


## Lesson Summary

You should now be able to:

- ✔ Describe the MAS program and its applicable FAR guidance
- ✔ Describe processes used by ordering activities prior to placing an order for Schedule services
- ✔ Recognize procedures and requirements related to ordering Schedule services
- ✔ Identify how to use Blanket Purchase Agreements (BPAs) and Contractor Team Arrangements (CTAs) in ordering Schedule services
- ✔ Identify additional considerations for ordering Schedule services

# MAS Desk Reference



## MAS Desk Reference

Available through CMLS

[www.gsa.gov/cmls](http://www.gsa.gov/cmls)

# MAS – PS Ordering Guides

## PSS Ordering Guides & Other Guidance

Access these ordering guides and guidance to help with your acquisition.

SIN	NAICS	Document Name	SIN Name
8207	541111	Ordering Guide for Contract Audit Related Services [PDF - 475 KB] Under the Professional Services Schedule [PDF - 920 KB]	Financial & Performance Audits
84140	561300	Guidance when using Other Direct Costs in support of Conference Events or Trade Shows [PDF - 242 KB]	Conferences, Events, and Trade Show Planning Services
8746	541611	Acquisition Support Services Ordering Guide	Acquisition Management Support
8746	541611	Notice regarding prohibition of Inherently governmental services	Acquisition Management Support
8746	541611	Importance of Training for Acquisition Personnel	Acquisition Management Support
8746	541611	Sample non-disclosure Statement	Acquisition Management Support
8746	541611	Sample Request for Quote Template	Acquisition Management Support
8748	611430	Acquisition Workforce Training Ordering Guide	DAU and FBI Certified DAWIA and FAC Acquisition Workforce Training
8712	541330 54711 54712	Space Launch Services Integrated Services [PDF - 475 KB] Implementation Guide [PDF - 475 KB]	Concept Development
8717	236220 541330	Implementation Guide	Construction Management and Engineering Consulting Services Related to Real Property

## MAS-PS Ordering Guides

Available at

<https://www.gsa.gov/buying-selling/products-services/professional-services/acquisition-support#PSS%20Ordering%20Guides>

## Additional Web Resources

- Acquisition Gateway <https://hallways.cap.gsa.gov/login-information>
- Multiple Award Schedules [www.gsa.gov/schedules](http://www.gsa.gov/schedules)
- CALC Pricing Tool <https://calc.gsa.gov>
- eLibrary [www.gsaelibrary.gsa.gov](http://www.gsaelibrary.gsa.gov)
- GSA *Advantage!* [www.gsaadvantage.gov](http://www.gsaadvantage.gov)
- eBuy [www.ebuy.gsa.gov](http://www.ebuy.gsa.gov)
- MAS News [www.gsa.gov/masnews](http://www.gsa.gov/masnews)
- Interagency Contract Directory  
<https://contractdirectory.gov/contractdirectory/>
- PSC Interact Community  
<https://interact.gsa.gov/groups/professionalservicescategory>



## Interact Blog Post Highlights

- Services Ordering Solutions-Table of Contents  
<https://interact.gsa.gov/blog/services-ordering-solutions-table-contents>
- Catalogue of Sample Terminology for RFQs/Orders  
<https://interact.gsa.gov/blog/catalogue-sample-terminology-rfqorders>
- RFQ not RFP for FSS orders <https://interact.gsa.gov/wiki/its-rfq-quote-rather-rfp-offer-when-talking-about-orders-against-schedules-far-84>
- Avoid using FAR 15 Terminology <https://interact.gsa.gov/blog/avoid-far-part-15-terminology-just-say-no-%E2%80%9Cdiscussions%E2%80%9D-and-follow-suggested-rfq-language>
- FAR 12 Vs FAR Subpart 8.4. Who wins? <https://interact.gsa.gov/node/454788>
- MAS-PS Order NAICS codes and set-asides  
<https://interact.gsa.gov/document/pss-order-naics-codes-and-set-asides>



## Webinars and Online Training

- Monthly Webinars sponsored by the MAS Program Office <http://www.gsa.gov/masnews>
- Training Videos - <http://www.gsa.gov/portal/content/210517>
- Continuous Learning Modules
  - Federal Acquisition Institute <https://www.fai.gov/drupal/>
  - Defense Acquisition University



<http://icatalog.dau.mil/> Search for continuous learning modules with FAC prefix



