

**MULTI-ASSOCIATION COMMENTS ON  
THE RECOMMENDATIONS OF THE SECTION 1423  
ACQUISITION ADVISORY PANEL'S  
INTERAGENCY CONTRACTING WORKING GROUP**

The Multi-Association has reviewed the Preliminary Working Group's Draft dated February 22, 2006 of the Acquisition Advisory Panel's Interagency Contracting recommendations. Overall, we applaud the work of the Panel and the need to provide formal guidance on these vehicles across the entire federal sector. We believe the recommendations, when implemented will provide effective oversight as well as improve acquisition planning and industry's response to government needs.

We offer the following comments:

- a. Recommendation #1 **"Increase transparency through identification of vehicles (e.g. GWACs, MAC, enterprise wide) and Assisting Entities."**
  1. We encourage you to keep separate the identification of vehicles and the identification of assisting entities. They are not inherently related. Some vehicles are established by assisting entities, but it is not uncommon for assisting activities to use contracts established by other activities.
  2. Greater consideration should be given to current OMB efforts to collect information concerning both interagency/assisted services acquisitions and GWAC/MAC contract vehicles.
  3. Encourage the OMB to separately identify enterprise wide acquisitions in its survey efforts.
  
- b. Recommendation #2 **"Make available the vehicle and assisting entity data for three distinct purposes."**
  1. In issue #2 (relating to three purposes of data), the first sub-bullet under the second purpose addresses "fee calculations." We recommend you move this item out of the second purpose (addressing oversight) to the first purpose (features to meet agency needs). In addition, while we concur that the fees (and other expenses) charged by another federal agency/contract is an appropriate element of the analysis for an agency when determining whether to use another contract vehicle, we recommend adding an additional sub-bullet so that agencies look at the INTERNAL COSTS to the agency of replicating the opportunity. This is the other side of the balance sheet that an agency must take into account before being able to determine whether it is cost-effective to use another agency contract. PSC made this same recommendation to DoD in response to the Mike Wynne October 2004 memo on DoD's use of other agency contracts.

- c. In your Recommendation #4 “**OMB direct a review and revision, as appropriate, of the current procedures for the creation and continuation/reauthorization of GWACs and Franchise Funds**”, We believe there would be greater clarity around the recommendations if this item were divided into three separate sub-bullets.
1. The first would cover the first sentence where OMB directs a review of the current procedures.
  2. The second bullet should cover the second sentence relating to GSA’s review of the Schedules.
  3. The final bullet should address the last sentence, but be revised to be clear that “Each review [not just procedures] should address the entire landscape of existing vehicles...”
- d. Recommendation #9---“**OMB sponsor a detailed analysis of the effectiveness of Panel recommendations and agency actions in addressing the finding and deficiencies identified in the Acquisition Advisory Panel Report**”
1. We urge the Panel to mandate OMB aggressively implement these recommendations. Timely action, not protracted analysis on these requirements is needed. Swift implementation of these recommendations will slow down unnecessary proliferation of additional Interagency Contracts, reduce the workload of government acquisition workforce, as well as reduce industry’s bid and proposal costs from responding to potentially redundant vehicles that may not offer a viable return on investment.
  2. We recommend OMB be requested to provide an implementation timeline, with the identified agencies responsible for implementation, to the panel’s recommendations within 180 days after final approval.