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March 9, 2023

Office of Professional Services and Human Capital Categories  
GSA, Federal Acquisition Service  
1800 F Street NW  
Washington DC 20405

Sent via email to:

Chelsey Hayes, Acquisition Program Manager, Program Management Office  
[chelsey.hayes@gsa.gov](mailto:chelsey.hayes@gsa.gov)

Paul Szymanski, OASIS+ Small Business Contracting Operations Branch Chief  
[paul.szymanski@gsa.gov](mailto:paul.szymanski@gsa.gov)

Josh Houseworth, OASIS+ Small Business Contracting Officer  
[joshua.houseworth@gsa.gov](mailto:joshua.houseworth@gsa.gov)

**Subject: GSA OASIS+ MAC Program, Small Business, Research & Development Domain, under North American Industry Classification System (NAICS) codes 541713; 541714; 541715, including Exceptions 1, 2, and 3; and 541720**

Dear Ms. Hayes, Mr. Szymanski and Mr. Houseworth:

Thank you in advance for review of this letter. I am writing to you on behalf of the members of the Small Environmental Business Action Coalition, Inc. (SEBAC), [www.sebac.org](http://www.sebac.org). SEBAC serves as a voice for the small business community providing environmental engineering, remediation and related support to the U.S. Department of Defense (DOD) and other Federal agencies throughout the country. A key part of our mission is to support and promote opportunities for small businesses by monitoring the federal government's goals, policies, and regulations regarding small business participation.

The U.S. General Services Administration (GSA) released the One Acquisition Solution for Integrated Services (OASIS)+ Multi-Agency Contract (MAC) Draft Request for Proposals (RFP) dated 6 March 2023. We are writing this letter to express our concern over the minimum qualifications required for small businesses (SBs) and socioeconomic SBs seeking to compete in the Research and Development (R&D) domain.

The Draft RFP has set the minimum annual value required for Qualifying Projects (QPs) in the R&D SB domain at \$1 million, which is the highest annual value GSA is requesting for any of the SB domains. Of the six other SB domains, two require a minimum annual value of \$250,000 and four require a minimum annual value of \$500,000.

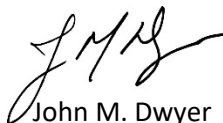
Requesting a minimum annual value of \$1 million for QPs from SBs and socioeconomic SBs wishing to compete in the R&D SB category will limit competition. The \$1 million annual value requirement is two to four times higher than the other GSA SB domains and is significantly higher than the current OASIS SB Pool

4 contract or similar federal environmental R&D projects. The current OASIS SB Pool 4 contract states that the “minimum dollar limitation for an individual task order must exceed the Simplified Acquisition Threshold as defined in FAR Subpart 2.101, as amended.” The current Simplified Acquisition Threshold is \$250,000. The Department of Defense (DoD), through the Strategic Environmental Research and Development Program (SERDP) and the Environmental Security Technology Certification Program (ESTCP), typically funds individual projects at \$200,000 to \$600,000 per year for all businesses, large and small.

We respectfully request that GSA re-evaluate the minimum annual value for QPs submitted to the R&D SB domain and adjust this value to align with the other GSA SB domain minimum annual values and typical industry funding. We suggest lowering the R&D SB QP minimum annual value to \$250,000, which is more consistent with the current OASIS SB Pool 4 contract and with industry practices. This will promote competition from SBs and socioeconomic SBs in this domain and provide the government buyers with access to a qualified pool of contractors to support the comprehensive R&D opportunities for the OASIS+ MAC Program.

I would kindly ask that you provide an acknowledgement of this letter. Please do not hesitate to contact the undersigned if we can be of any further service or provide additional information in support of our position on this matter: we can be reached at [jdwyer@sebac.org](mailto:jdwyer@sebac.org) and [soflaherty@sebac.org](mailto:soflaherty@sebac.org). We look forward to engaging you in a dialogue, and we thank you for your consideration.

Respectfully,



John M. Dwyer  
President  
SEBAC