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To: David C. Childs A-76comments/OMB/EOP@EOP

cc:

Subject: Comments to Revisions

Dear OMB,

I am pleased to provide my comments to your revision to Circular A-76 as follows:

First, that all cost proposals include a breakdown of labor that distinguishes direct labor costs such as wages and salary from costs associated with personnel benefits, such as sick time, vacation, retirement, health benefits, etc. Further, the proposals should outline in broad terms the categories of labor (management, front line supervision, and non-supervisory) the costs would be associated with. This would provide valuable comparison information during the best value determination. It will allow visibility into whether the commercial vendors are providing, more, less, or equivalent staffing at each level in comparison to the government activity.

Second, in all competitions, a consistent set of metrics related to the volume (and quality) of work performed should be established in advance of the competition itself. This in turn could be used to establish the true effectiveness of the awardee in comparison to the previously existing government activity. The metric should look back to the government activity's output of the previous three to five years, and establish a baseline of what volume of work they performed and at what cost they performed it. This metric should be coordinated with the PWS development and establishment of contract performance criteria, so as to be able to effectively measure performance post-award. Significant deviations from the baseline metric would provide more information to the contracting officer in making incentive payments, or penalty determinations.

Thank you for your time and consideration,

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