



Revised OMB Circular A-76 has some differences from the original circular and also the draft version

Former rules	Draft changes	New guidance
Agencies received minimal guidance on planning for competitions	Increased guidance	Further expansion of planning requirements
No mandatory time frames for conducting competitions	12-month time frame; allows six-month extension with OMB approval	12-month time frame; allows six-month extension with OMB notification
Decisions based on low cost	Integrated source selection process allows consideration of cost and quality, primarily for IT work	Allows agencies to consider cost and quality on IT and other types of work; in most cases, cost must account for 50 percent of source selection decision
Unique procurement process, different from Federal Acquisition Regulation	Integrates some FAR rules	Further incorporates procurement regulations, emphasizes equal application of requirements to public and private bidders; allows directly interested parties to challenge actions taken in connection with a standard competition
Allows direct conversion of 10 or fewer full-time positions to the private sector	Allows direct conversion of 10 or fewer full-time positions	Eliminates direct conversions
Allows streamlined competitions of 65 or fewer full-time positions	Allows direct conversion of 50 or fewer full-time positions based on a business-case-style analysis	Allows streamlined competition process with expanded time frame for 65 or fewer full-time positions; streamlined competitions do not require use of lowest-cost provider; appeals of decisions not allowed
Requires the lesser of 10 percent of the government bidder's personnel cost, or \$10 million, to be added to the nonincumbent bidder's proposal on streamlined and standard competitions	Requires the lesser of 10 percent of the government's personnel costs, or \$10 million, to be added to the nonincumbent's bid on standard competitions	Same as draft
No presumption that activities are commercial	Presumes that all activities are commercial unless proven otherwise	No presumption that activities are commercial; agencies must justify functions they label inherently governmental
No requirement to identify inherently governmental work	Agencies must justify functions they label inherently governmental	Allows challenges to agency-justified public performance of commercial activities; simplifies definition of inherently governmental
Government bidder guaranteed a seat at the table, even if offer is deficient	Right to exclude government bidder in integrated source selection process only	Right to exclude government or private-sector bidder if offer is deficient; if government bid is deficient, agency official must decide if, given additional resources, the agency could submit a better bid
Minimal post-competition performance accountability for government bidder	Creates accountability rules for government bidder	Expanded accountability for public- and private-sector bidders