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Subject: Comments

1. The 12-month time to complete the A-76 process should start on the effective date of the revised circular for acquisitions in process on that date (where solicitations have not been issued). The clock on acquisitions in process should NOT go back to the date of public announcement. Abruptly shortening the schedule for acquisitions in progress will not be beneficial to the outcome of the process. A look within DOD acquisition reform history will show that acquisitions pursued in haste are continually trying to recover.

2. A-76 competitions should follow the same acquisition processes used for traditional procurements, even if use of these processes cause timelines longer than 12 months. To rush through the acquisition process is unfair to MEO teams who, unlike their commercial counterparts, are not savvy in the ways of proposal preparation.

3. Creation of the acquisition strategy, preparation of the RFP, and conduct of the source selection should be done in a thoughtful manner without pressure for speed. Traditional procurements where schedule to get on-contract outweighs quality of the acquisition lead to performance by contractors ill-equipped to perform and expensive changes to the work after contract award. Thoughtful development and understanding of the requirements will do more to achieve desired performance and low cost than rush to award.

4. Attachment 2 - C.3 - One of the more common source selection techniques used to determine the successful offeror in current traditional competitions is Price-Performance Trade-Off (PPT). In PPT technical acceptability may or may not be assessed, but if assessed, those considered acceptable are then evaluated for quality of past performance and price. The selection turns on the monetary worth of the best performance. In contracting with commercial contractors for effort exceeding \$100,000/yr, the DOD assesses contractor performance at least annually and develops a report which is kept in a central repository for future purposes of evaluating contractors past performance during source selections. To make the proposed A-76 process viable, a similar means of assessing and documenting MEO performance needs to be instituted. At present, I do not see how an MEO can fairly compete in a PPT competition as they have no or inadequate past performance documentation.

5. A means of speeding up the A-76 process is to keep reviews of MEO documents and solicitation documents local to the acquisition and set reviews to no more than one or two weeks for turn-around. Example, giving the Independent Review Official 30 days to review the MEO tender unnecessarily elongates the process. If the MEO and acquisition teams are rushing to meet deadlines, the review people in the process need to perform reviews in much shorter time frames. In addition, the process makers need to ensure that reviews result in value added to the process. In any acquisition, the more senior level and bureaucratically removed the reviewer, the less value-added the comments. Most acquisition organizations have adequate local review capability for any type acquisition. The HR

office in conjunction with the legal and contracting functions should be able to protect the integrity of the A-76 process given sufficient training.