

The American Council of Engineering Companies (ACEC), the business association of the U.S. engineering industry, representing nearly 6,000 member firms, provides the following comments on “Information Collection 9000–0157”. ACEC has focused on “ways to enhance the quality, utility, and clarity of the information to be collected; and ways in which we can minimize the burden of the collection of information on those who are to respond.” The comments relate to GSA Standard Form 330, “ARCHITECT-ENGINEER QUALIFICATIONS”.

## OVERALL

1. Considering the varying agency specific instructions and contract specific requirements for each SF 330 Part 1 submittal, the 29 hours per response appears to be low. For large project contracts, with many team members, the submission can involve thousands of person hours.
2. Provide guidance on customizing the forms (adding logos, photos, color, etc.), while keeping the basic layout. Standardize across agencies if possible.
3. Allow emailing of SF 330s in .pdf format as an option. The burden of printing numerous copies of what are often very lengthy documents should gradually give way to a fully electronic system.

## PART I - CONTRACT-SPECIFIC QUALIFICATIONS

1. Section C should be modified to show each team member’s project management office and their project role. Allow additional offices to be listed to at the discretion of the submitter or have a staff cutoff for the offices listed, that is, if an office contributes less than 3 people to the project it need not be listed.
  - a. Listing of every office for which a resume is provided can require a significant entry for large projects (affect page limited submissions). Problems occur for every project of significant size with SF 330 page limitations. Many firms confuse the requirement and list only the major offices supporting the contract. Federal selection committees rarely, if ever, disqualify submissions due to an inconsistency between Section C and Section E resumes.
  - b. Through electronic sharing of work, using personnel from multiple offices is commonplace, usually at negligible or no additional cost.
2. Section E should change the “other professional qualifications” box to a narrative description of the individual’s relative experience.
3. Section F project descriptions should be limited to 2 pages, standardized across all agencies, at the discretion of the submitter.
  - a. Currently, Section F projects are constantly being re-written to fit individual agency page limitations, increasing proposal costs and time.
  - b. Officially, all agencies should accept a task order as a “project” and also a task order contract (IDIQ Multiple Award Task Order Contract) with multiple relevant task orders assigned.
  - c. Often agencies limit projects to those performed in the last 5 years. We would propose allowing all offerors, especially small businesses, to include older projects, for the following reasons:
    - i. Many federal contracts are IDIQ contracts.
    - ii. Often a small business is unlikely to have more than one IDIQ contract with an agency.

- iii. IDIQ contracts are typically 5 years in length.
  - iv. If a small business wins an IDIQ contract and then we are not selected for the follow-on IDIQ contract (including for rotation to keep a resource base), their experience is out of date for the next competition.
  - v. Small firms typically have less turnover of key personnel.
  - vi. Allowing older relevant projects would permit small businesses to better demonstrate experience of the firm and the key personnel.
- 4. Section G should be eliminated altogether. It provides no basis for comparison; there is no threshold for amount of involvement a person must have on a project in order to receive a check. Involvement can vary from minor monitoring to significant design involvement. The Sections E & F should provide the basis for comparing experience of team members. Since Section F has 10 projects, it may be beneficial to allow 10 projects (instead of the current 5) to be reported on each resume for Section E; which would allow for a description of the actual work that each person performed on each project.
  - a. There are many problems associated with the Section E, F and G tie-in. In an era where teaming and joint venturing are common, Section G unfairly favors firms with previous teaming relationships on Section F projects and punishes qualified teams that have not worked together on their 10 most contract relevant projects.
  - b. Due to the movement of personnel across the industry, particularly in this current timeframe and next 5 years, the tie-in between Section E resumes, Section F projects and G is more difficult to show robustly.
  - c. Section G unfairly favors firms that have a “center of excellence” approach to federal work which provides for the same personnel to work on every federal project vs. firms that have distributed staff among many geographic locations that have great personal qualifications but typically only work on Section E projects in their geographic region.
  - d. The Section G matrix can hurt firms who are proposing new staff. A new staff member may have extensive experience on similar projects, but they haven't yet worked on the firm's Section F projects. This doesn't show well on the Section G matrix.
- 5. Section H needs individual clarification regarding what information each agency would really like to see. Section H is the only space for actual narrative, aside from a cover letter. The more explicit RFQ language is regarding Section H, the better.
  - a. Solicitation instructions should be very clear on not repeating Section E (Resumes) information in Section H, and very clear as to what is wanted in the Professional Qualifications selection criteria.
  - b. If Past Performance is going to be rated solely on ACASS, or PPQs when ACASS ratings are not available, or some other known approach and not any additional write-up, the agency should so state that in the solicitation and that criteria not required in Section H.
  - c. Selection criteria need to be as specific as possible in the solicitation, as to what the agency wants to see in each selection criteria write-up.
  - d. Volume of Work should be eliminated as a required write-up, because every firm interprets it differently. Federal agencies use federal sources for the number anyway.

## PART II - GENERAL QUALIFICATIONS

1. Instructions need to clarify which parts are for the whole firm, which are for an office (e.g. annual average revenues).

Mark E. Steiner, P.E.

Senior Policy Director

American Council of Engineering Companies