



November 16, 2017

General Services Administration,
Regulatory Secretariat Division (MVCB)
ATTN: Mr. Poe/IC 9000-0157
1800 F Street NW.,
Washington, DC 20405

Dear Mr. Poe:

The following comments are submitted on behalf of the American Council of Engineering Companies (ACEC), the association of the nation's engineering industry. Representing over 5,000 engineering firms of all sizes, the Council is pleased to provide comments on the Submission for OMB Review; Architect-Engineer Qualifications (Standard Form 330) as published in the *Federal Register* Volume 82, Number 194 (Tuesday, October 10, 2017).

I. Introduction

The SF330 allows engineering companies to present information that enables federal contracting officers to discern and judge the firm's competencies and prior experience—no matter the type of contracting vehicle. It is a standard document that allows for generally consistent questions across all government agencies which should allow for firms to be selected on their qualifications. At the same time, it must be understood that every infrastructure request is different – from a barracks or military airfield to a national park project or an embassy – demanding varying requirements, disciplines and other relevant points needed to identify the most highly qualified service provider.

It is essential that the SF 330 be structured and worded to offer competing firms an effective and flexible platform with which to compete for a single, small project or for larger multi-year contracts covering the needs of federal clients and the range of services this industry provides. In addition, it is important to note that completing an SF 330 is rarely a matter of a single person filling out a form. Instead, the endeavor frequently requires teams of people who plan, draft, and finalize careful responses to the government's highly detailed requirements.

The Council appreciates the opportunity to engage in this process to make the form less burdensome and more efficient for both the engineering firms competing and the contracting officers they work with. The three sections below outline the opportunities for improvement in the form.

II. Estimate of Hours

The assumption listed on the current SF 330, of twenty-nine hours per response under Annual Reporting Burden is unrealistic. Member firms estimate that responding to a simple Qualifications-Based-Selection synopsis requires at least eighty hours, while complex competitions may require twice as many hours. It is not unusual for the “Selection Criteria” and “Submission Requirements” portions of an architect-engineer services synopsis to contain dozens of separate requirements and instructions, some requiring a custom response that may include a data collection effort and composing a narrative of hundreds of words. Moreover, the estimate does not reflect the amount of input and consultation that will occur between the prime and subcontractors to create a complete response to the solicitation.

III. Data Consistency and Clarity

Firms have raised a broader issue regarding how data is reported on the SF 330. There is a concern that reporting current projects that are already reported in the Federal Procurement Data System (FPDS) creates a duplicative reporting burden on the firms. In some Brooks Act procurements (especially for Department of Defense agencies), it is typical for the selection criteria to include the “...volume of work previously awarded to the firm with the object of effecting an equitable distribution of architect-engineer contracts.” Because previous awards data may be obtained from the FPDS, the government should use that objective source and should not allow respondent firms to self-report their previous awards. This change would ensure consistency of data across competitors and would remove the information collection burden associated with self-reporting.

IV. Consistency of Data and Submission of Material

Member firms have commented that there are places within the form that need either additional clarification or potential restructuring. Those items are as follows:

- a. Add to Part I, Section B, a field for the Data Universal Numbering System (DUNS) number (or other unique identifier) of the responding entity and allow for additional DUNS numbers to be provided optionally.

Many agencies require the respondent’s DUNS number in Section B, so it would be logical to standardize the requirement. DUNS numbers enable government selection officials to search the Past Performance Information Retrieval System (PPIRS) for the respondent’s past performance information. Because a single firm may have past performance information stored under multiple DUNS numbers, respondents should be encouraged, but not required to list multiple DUNS numbers that will enable the government to find additional relevant information in the PPIRS. In some cases, larger firms have multiple office locations with

multiple DUNS numbers and it can be inefficient for a contracting officer to look through the DUNS numbers of firms that are unconnected to the project.

- b. In Section E, member firms commented on ambiguous language in the request. There was a recommendation to remove the parenthetical instruction from Part I Section E.19(3) – “(Brief scope, size, cost, etc.).” Here, the term “scope” is redundant with the main instruction to provide a “Brief description” while the term “size” is ambiguous or inapplicable in many cases. In some cases, it can be overly burdensome to provide cost information on the Section E.19 “Relevant Projects.”
- c. Section F.25 (3) also has an ambiguous use of “scope” that needs to be further clarified. Is this term meant to define the firm or does it describe the prime or subconsultant’s work? The lack of clarity regarding the nature of the requirement forces firms to submit extraneous information that adds a burden on the submitter, while also increasing contracting officer’s review of extraneous information that firms submit in an effort to “cover their bases.”
- d. The Section G instructions should be changed to allow respondents to exclude subconsultant staff from the required table. Some member firms believe that Section G incentivizes respondents to propose the same staff who worked on the projects cited in Section F. This incentive motivates prime respondents to avoid new team partners, thus reducing available opportunities for emerging small and disadvantaged businesses to team with strong primes.
- e. In Part II, firms request that codes be expanded past the current twenty-one line limit. The limit creates difficulty for firms to accurately reflect capabilities when business systems are organized around a broader set of discipline codes.

The Council appreciates the opportunity to submit comments on the Guidance and we stand ready to work with the DOL and the FAR Council on implementing these changes to their proposal.

Sincerely,



Jessica Salmoiraghi
Director of Federal Agencies and International Programs
American Council of Engineering Companies