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GSA Office of Governmentwide Policy

MEMORANDUM FOR MARY A. DAVIE

**ASSISTANT COMMISSIONER
INTEGRATED TECHNOLOGY SERVICES (ITS)**

FROM:

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SUBJECT: Class Deviation to Federal Acquisition Regulation (FAR) Subpart 17.5, Interagency Acquisitions for Salesforce-certified implementation, integration and support services (SISS) Blanket Purchase Agreement (BPA)

1. **Purpose.** This class deviation exempts the multiple-award, multiple-agency BPA for SISS from the business-case analysis requirement at FAR 17.502-1(c).
2. **Background.** On September 29, 2011, the Office of Federal Procurement Policy (OFPP) issued memorandum *Development, Review, and Approval of Business Cases for Certain Interagency and Agency-Specific Acquisitions* to prevent agencies from establishing overlapping and duplicative contracts for supplies or services. The memorandum outlined required elements of business case analysis and a process for developing, reviewing, and approving business cases to support the establishment and renewal of GWACs, multi-agency contracts, BPAs, and agency-specific contracts¹. On January 3, 2012, a final FAR rule was issued to amend FAR subpart 17.5 to expand the requirement for business-case analysis when creating multi-agency contracts (MACs) to include Government-wide acquisition contracts (GWACs). In addition, the final rule incorporated the OFPP business case guidance into FAR 17.502-1(c).

On February 11, 2011, the White House released the Federal Cloud Computing Strategy that instituted Cloud First policy and mandated agencies take full advantage of cloud computing benefits to maximize capacity utilization, improve IT flexibility and responsiveness and minimize cost. The Executive Office of the

¹ OFPP Memorandum, *Development, Review, and Approval of Business Cases for Certain Interagency and Agency-Specific Acquisitions* (<http://www.whitehouse.gov/sites/default/files/omb/procurement/memo/development-review-and-approval-of-business-cases-for-certain-interagency-and-agency-specific-acquisitions-memo.pdf>)

President (EOP) and the General Services Administration (GSA) co-chair the Interagency Cloud Working Group (ICWG) to further Cloud First policy and exchange best practices. The ICWG has heavily focused on Salesforce.com because of the significant cross-government investment on the platform, and allows Government Product Owners, Technology Leadership, and Team Leaders for agile/cloud/Customer Relationship Management (CRM) to share information about each agency's pursuit of licenses and services, exchange best practices, and gain economies of scale by partnering across the government to implement and expand upon cloud technologies.

Based on the ICWG findings and OMB's directives, GSA FAS Office of Integrated Technology Services has been requested by both these two entities to establish the multi-agency consolidated BPA for SISS that will maximize the collective buying power of the Federal Government and fulfill important mandates such as the Federal Information Technology Acquisition Reform Act (FITARA) and the OFPP memorandum *Transforming the Marketplace: Simplifying Federal Procurement to Improve Performance, Drive Innovation, and Increase Savings*. Consequently, GSA FAS Office of Integrated Technology Services is requesting a deviation to the business case requirement for the SISS BPA as this contract vehicle is being established at the direct request of OMB.

3. References.

- OFPP Memorandum, Development, Review, and Approval of Business Cases for Certain Interagency and Agency-Specific Acquisitions, dated September 29, 2011.
(<http://www.whitehouse.gov/sites/default/files/omb/procurement/memo/development-review-and-approval-of-business-cases-for-certain-interagency-and-agency-specific-acquisitions-memo.pdf>)
- The White House, Federal Cloud Computing Strategy, dated February 11, 2011.
(https://www.whitehouse.gov/sites/default/files/omb/assets/egov_docs/federal-cloud-computing-strategy.pdf)
- OFPP Memorandum, Transforming the Marketplace, Simplifying Federal Procurement to Improve Performance, Drive Innovation, and Increase Savings, dated December 4, 2014.
(<https://www.whitehouse.gov/blog/2014/12/04/transforming-marketplace-simplifying-federal-procurement-improve-performance-drive-i>)
- FAR 17.502-1(c)
(https://acquisition.gov/far/current/html/Subpart%2017_5.html#wp1076801)

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