



5/6/2022

Class Justification CD-2022-06

MEMORANDUM FOR THE PBS LEASING ACQUISITION WORKFORCE

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SUBJECT: Class Justification - Lowest Price Technically Acceptable Source Selection Process for Lease Acquisitions utilizing the AAAP Platform

1. Purpose.

This memorandum approves an updated temporary class justification providing Public Buildings Service (PBS) limited authority to use the lowest price technically acceptable (LPTA) source selection process for lease procurements utilizing the Automated Advanced Acquisition Platform (AAAP).

2. Background.

Federal Acquisition Regulation (FAR) 15.101-2(c)(6) requires that the contracting officer (CO) documents the contract file describing the circumstances that justify the use of the LPTA source selection process.

On March 24, 2021, GSA issued CD-2021-08 to provide Public Buildings Service (PBS) limited authority to use the lowest price technically acceptable (LPTA) source selection process for specific lease actions for one year.

On March 17, 2022, PBS National Office of Leasing (NOL) requested an extension of CD-2021-08 citing challenges obtaining data due to the length of time involved in completing a GSA lease procurement¹.

¹ See Attachment A

Recognizing these challenges, this class justification extends the class justification for three years while also limiting the scope to only apply to lease procurements using AAAP. PBS must also provide more analysis that tests the effectiveness of LPTA over a trade-off evaluation on obtaining the best value for the taxpayer prior to increasing the scope of the justification.

The data requested below aims to better understand the number of lease procurements competed, the impacts the evaluation methodology has on the lease competitions, whether or not GSA is competing with the tenant agency's total requirements, and any efficiencies gained by using LPTA.

3. Automated Advanced Acquisition Platform (AAAP).

The **Automated Advanced Acquisition Program (AAAP)** is a multiple award lease procurement tool. The AAAP allows the market to compete for multiple federal leases by submitting a single offer through a simple online platform. The AAAP Platform collects best and final offers, for generic office space needs, that remain in a secure database throughout the fiscal year (Oct 1–Sept 30).² AAAP is generally not used for new construction, projects with complex build-out requirements, or projects over the prospectus threshold.

4. Authority.

This class justification is issued in accordance with GSAM 501.404 and 501.707. This action is requested by PBS in accordance with FAR 1.703, 1.704 and 15.101-2.

5. Applicability.

This class justification applies to lease procurements utilizing the Automated Advanced Acquisition Platform (AAAP).³

For the lease procurements not covered, if LPTA is to be used, the CO must document the file with a separate determination as described in FAR 15.101-2(c)(6).

² AAAP Frequently Asked Questions: https://lop.gsa.gov/resource/1616000694000/AAAP_FAQ

³ AAAP Login page: <https://lop.gsa.gov/AAAP/LoginPage>

6. Requirements.

For each proposed lease contracting action taken pursuant to this class justification, as a reminder, contracting officers should ensure the contract file includes documentation of the below details. These details could be captured in the acquisition plan, price negotiation memorandum, or other acquisition document.

- a. Determination that the requirement falls within the scope and applicability of this class justification (see FAR 15.101-2).
- b. Determination that the proposed contractor is responsible for performing the work (see GSAM 570.108, and FAR 9.104).
- c. Determination that the proposed contract pricing is fair and reasonable consistent with market conditions and the Government's requirements (see GSAM 570.203-4(d), GSAM 570.306(b), and FAR 15.404-1).

7. Reporting.

PBS Office of Leasing (PR) will report results, progress, lessons learned, and challenges to the Office of Acquisition Policy (MV) to determine the need to continue or revise the class justification. **Reports shall be provided** to the SPE on a **quarterly basis**.

As a means of reflecting on whether LPTA is a more effective means of obtaining the best value for the Government, PBS must provide, at a minimum –

- a. Total number of lease awards during the evaluation period -
 - i. Number of full and open competition leases
 - ii. Number of superseding leases
 - iii. Number of succeeding leases
- b. Of the lease awards fully competed, identify -
 - i. Number of leases that used LPTA evaluation methodology (i.e., lease procurements using AAAP)
 1. Average number of offers received
 2. Average dollars spent on above standard improvements
 3. Average procurement lead time (from solicitation to award)

- ii. Number of leases that used Trade-Off evaluation methodology (i.e., lease procurements not using AAAP)
 - 1. Average number of offers received
 - 2. Average dollars spent on above standard improvements
 - 3. Average procurement lead time (from solicitation to award)

8. Effective Date.

This class justification is effective immediately and remains in effect for three (3) years until May 31, 2025.

9. Point of Contact.

Questions regarding this class justification may be directed to Marten Wallace at GSARPolicy@gsa.gov.

Attachment

Attachment A - PBS NOL Request to Extend LPTA Class Justification