CONSOLIDATION OF CONTRACT REQUIREMENTS DETERMINATION
FOR
W912HP26XXXX
Single Award Task Order Contract
for Facility Investment Services Marine Forces
Reserve (MARFORRES) Northeast Region
(As prescribed by RFO 7.107-2 and AFARS 5107.107-2)

RATIONALE

1. Consolidation may provide substantial benefits to the Government. However, because of the potential impact on small business participation, before conducting an acquisition that is a consolidation of requirements with an estimated total dollar value exceeding $2 million, a written determination shall be made that the consolidation is necessary and justified in accordance with 15 U.S.C. 657q, after ensuring that--

   (a) Market research has been conducted;

   (b) Any alternative contracting approaches that would involve a lesser degree of consolidation have been identified;

   (c) The determination is coordinated with the agency's Office of Small Disadvantaged Business Utilization or the Office of Small Business Programs;

   (d) Any negative impact by the acquisition strategy on contracting with small business concerns has been identified; and

   (e) Steps are taken to include small business concerns in the acquisition strategy.

2. **Introduction:**

   The U.S. Army Corps of Engineers (USACE), Charleston District (SAC), proposes to solicit and award one (1) regional Firm Fixed Price (FFP) Single Award Task Order Contract (SATOC) for recurring facility support services, and for additional non-recurring services in the amount of [redacted]. The planned duration for this contract is a total of five (5) years, consisting of a one (1) year base ordering period plus four (4) options for ordering periods of one (1) year each. The FFP contract will consist of (1) regional contract for facility support services, using the North American Industry Classification System (NAICS) code 561210, Facilities Support Services, in support of the Marine Forces Reserves (MARFORRES) Northeast AbilityOne Region facilities. This procurement constitutes consolidation of requirements per RFO 7.107-2 in that a single solicitation will be used to obtain offers for a single contract to satisfy two (2) or more separate requirements for services that have previously been provided and performed under two or more separate contracts and involves services at two or more discrete sites. SAC has conducted an acquisition

history analysis and market research that demonstrates consolidation of requirements in this procurement is both necessary and justified.

3. **Description of the Procurement Action:**

a. Project Description: NAFVAC MIDLANT currently provides facility support services for the 3 listed MARFORRES Marine Corps Reserve Centers (MCRC) using Base Operating Services (BOS) Contracts. These multiple contracts resulted in added costs and inefficiencies because no single contractor operates as the lead for all facility support services at any specific MCRC. SAC will assume responsibility for providing these services for the MARFORRES sites at Perrysburg, Lehigh Valley, and Erie in FY26. To support this requirement, SAC intends to advertise one (1) solicitation, and award one (1) regional Single Award Task Order Contract (SATOC), shown below. This course of action is the most effective, efficient, and least costly means of meeting MARFORRES mission objectives.

Northeast AbilityOne REGION
PERRYSBURG, OH
LEHIGH VALLEY, PA
ERIE, PA

The purpose of this acquisition is to establish a procurement tool that will enable SAC to provide the highly responsive support necessary for MARFORRES to meet its mission needs and improve overall operations for the above-listed Northeast AbilityOne Region sites. The contract will provide performance-based facility support services and minor repair services. Facility support services encompass an array of services such as preventive maintenance, system inspections, testing and certification, custodial, pest control, refuse collection and recycling, grounds maintenance and pavement clearance services. Repair work via service calls/IDIQ task orders will include roof repairs, refinishing of wall surfaces, repairing and replacement of heating and cooling systems, replacing tile and carpeting, and similar types of work.

b. Acquisition Strategy/Procurement Summary: To meet MARFORRES's needs, SAC intends to award one (1) regional FFP SATOC for recurring facility support services. The SATOC will be [redacted] and will have a total ordering period of five (5) years: (1) base year and four (4) one-year options. Task orders issued under these contracts will be FFP. The period of performance for individual task orders may extend beyond the life of the base contract, but in no case will a task order be placed once the ordering period if the base has expired. The contractor shall perform the work in accordance with the scope and delivery schedule negotiated in each task order. Market Research was conducted through a Sources Sought that was advertised, and through additional research. Through this research SAC determined that this acquisition would be 100% set-aside for Small Businesses. This acquisition approach supports the Small

Business Administration's (SBA) Small Business Program and is in the best interest of the Government with respect to timeliness, oversight, and administrative costs.

c. Applicability of Consolidation: Section 21671 of the FY13 NDAA amended the definition of consolidation as set forth in Sec 44 of the Small Business Act, 15 U.S.C. § 657q. In accordance with the definition in the statute, "consolidation of contract requirements," with respect to contract requirements of a Federal agency, means a use of a solicitation to obtain offers for a single contract or a multiple award contract - (A) to satisfy 2 or more requirements of the Federal agency for goods or services that have been provided to or performed for the Federal agency under 2 or more separate contracts lower in cost than the total cost of the contract for which the offers are solicited; or (B) to satisfy requirements of the Federal agency for construction projects to be performed at 2 or more discrete sites. Consolidation applies to this procurement, because a SATOC will be used to provide a variety of facility support services that have previously been provided and performed under 2 or more separate contracts.

d. Requirements Being Consolidated: The requirements being consolidated for the proposed SATOC include all supervision, labor, transportation, tools, materials, supplies, vehicles, and equipment necessary to perform facility support for the following services at the Northeast AbilityOne Region Sites located within the continental United States. Examples of this work include, but are not limited to, the following:

   Facilities Investment (SRM - sustainment, restoration, and modernization)
   Custodial
   Pest Control
   Refuse Collection and Recycling
   Grounds Maintenance
   Pavement Clearance

e. Procurement History: Presently, NAVFAC MIDLANT provides facility support services for the above-listed MARFORRES sites. To support this requirement, SAC will advertise one (1) solicitation, and award one (1) regional SATOC. This acquisition will establish a procurement tool that will enable SAC to provide the highly responsive support necessary for MARFORRES to meet its mission needs and improve overall operations.

f. Rationale for Consolidation: Consolidation provides advantages that substantially exceed the benefits of alternate approaches. It meets MARFORRES's mission objectives, increases efficiency, streamlines processes, ensures operational continuity, decreases costs, and provides faster response times. Using one (1) SATOC in accordance with RFO 19.104-1, that consolidates the requirements for facility investment, custodial, pest control, refuse collection and recycling, grounds maintenance, and pavement clearance, will provide an acquisition tool to enable these services to be cost effectively and efficiently provided. RFO Subpart 16.5 – Indefinite Delivery Contracts establishes a preference for making

multiple awards of indefinite-quantity contracts. The use of awarding multiple award task order contracts combines multiple requirements into one solicitation with multiple awards to several contracts. Use of an ID/IQ contract is appropriate in accordance with RFO 16.504-1, when exact times and/or exact quantities of future deliveries are not known at the time of award. RFO 16.504-2 indicates that the Contracting Officer may use an indefinite-quantity contract when the Government cannot predetermine, above a specified minimum, the precise quantities of supplies and services that the Government will require during the contract period, and it is inadvisable for the Government to commit itself for more than a minimum quantity. Contracting Officers should use an indefinite-quantity only when a recurring need is anticipated. It is anticipated that the proposed SATOC will be used to fulfill customer requirements for facility support services for three (3) locations. Consolidating these requirements into one (1) regional SATOC is advantageous to the Government, and using the preferred method of awarding a MATOC is not advisable for the following reasons:

- The use of a MATOC would not provide a lesser degree of consolidation, as all projected requirements would still be consolidated under the MATOC.
- Consolidation of mission objectives to provide preventive maintenance, service call, ID/IQ task order and municipal services is based on the premise that physical, operational maintenance of each facility is the primary purpose for these contracts, and provision of municipal services is secondary. Separating these requirements into individual regional or site-specific contracts does not provide a betterment over the previous contract structure that was in place through NAVFAC.

- The decision to focus on one (1) SATOC is based on the relative proximity of the sites in the region, allowing the Contractor the opportunity to be able to reasonably access the worksite. Combining the various requirements into a regional contract enables more efficient and cost-effective management, control and direct oversight of the contractor and services being performed.

- Limiting the number of contracts awarded enables the local facility staff to have more effective control over the number of contractors accessing the facility, which minimizes potential security threats.

Limiting the number of prime contractors enables uniformity and conformity with executing contract requirements consistently across all regions.

• Creating a large pool of smaller contracts does not incentivize proven contractors to respond to the acquisitions and increases the risk of quality performance, as evidenced by the procurement and performance history of previous acquisitions for these services.

• Consolidation also meets the Quantitative benefits as required in FAR 7.107- 2 Consolidation. This savings is provided in the Cost Savings Tables 1 through Table 3 found on Pages 11 and 12 of this Consolidation Memo.

4. **Results of Market Research:**

To determine market interest and capability, and the effects the proposed consolidation might have on competition, SAC used various methods in gathering the necessary market information, to include a Request For Information, coordinated through the GSA Market Research Team. A detailed discussion of these efforts and the information gathered is provided in paragraph a. below. The market research clearly demonstrates that the proposed consolidation will have no adverse impact on competition and does not present an additional cost risk to interested parties. Based on the results of the market research, it is determined that adequate competition is feasible and probable. Market research also showed that there would be no adverse impact on competition among small businesses. Market research indicated that there are capable companies willing and able to meet the requirements.

a. A Request for Information (RFI) was issued via the General Services Administration (GSA) on 23 January 2026, with responses received by 5 February 2026. The GSA RFI search identified twenty-nine potential contractors capable of performing the requirement. Of the twenty-nine identified vendors, twenty-five firms submitted responses, all of which were small businesses.

In accordance with RFO 19.104-1(a), “For contracts above the micro-purchase threshold, the contracting officer must set aside for small business if there is a reasonable expectation of obtaining offers (1) From two or more responsible small business concerns; and (2) That are competitive in terms of fair market prices, quality, and delivery.” In accordance with RFO 8.104(a) this acquisition will be a Total Small Business Set-Aside. A minimum of 3 contractors will be solicited; however, to obtain maximum competition throughout the MAS, all Small Business contractors will be given a fair opportunity to compete for this action by issuance of the eBuy RFQ (request for quote).

5. **Alternative Contracting Approaches and Rationale for Rejection:**

To conclude that the award of (1) one small business set aside SATOC contract

is the best solution to satisfy MARFORRES mission requirements for facility support services, SAC analyzed all alternative contracting approaches that would involve a lesser degree of consolidation or no consolidation at all.

a. **Alternative 1, One (1) Single Award Task Order Contract (SATOC) Contract:** A SATOC provides an acquisition vehicle that allows the Government to complete numerous minor repair and maintenance projects with a single, competitively awarded contract at a minimum cost. The benefits of the SATOC approach substantially exceed the disadvantages of consolidation for the reasons outlined below. In addition to minimizing acquisition time, performance and schedule risks, cost risks are minimized through open and thorough discussions of the description of work for each task order.

   Quality: A SATOC allows a single prime contract to facilitate a reduction in efforts related to quality assurance and contract administration for each respective region. One prime contractor performing quality control across its entire enterprise has shown to result in an overall improved quality of service.

   Acquisition Cycle: The use of SATOC will streamline the process by shortening the procurement lead-time by eliminating the pre-award activities required to solicit stand-alone requirements. Furthermore, past experience with this customer indicates that due to the constant tenant changes within the facilities, they routinely have a need for small projects requiring repair. The service call aspect this SATOC offers the customer will be quite valuable in reducing the acquisition cycle and allowing a quicker response to accommodate the needs of the customer. A SATOC will capture most administrative requirements as part of the base contract without reproduction in each task order. Also, at award, Contract Line Item (CLIN) prices are binding for the life of the contract with no further negotiation required, allowing for a streamlined process to execute work. As compared to awarding a stand- alone contract “C” type contract which on average could take up to 6 months, it is estimated that placing task orders under a SATOC reduces acquisition time from 6 months to 30 days on average for each project. This time reduction is crucial because the SATOC contract will be providing public works-type functions meaning much of the work is not known in advance (i.e., storm damage repair, chiller replacement, boiler repairs, etc.) and the ability to repair quickly is critical to keep a facility usable to support the Marines’ training tempo.

   Terms and Conditions: Other than request for proposal (RFP) requirements and proposal submissions, there is essentially no difference between the contractual terms and conditions for construction or repair project executed under a SATOC or a “C” contract. However, in accordance with RFO 16.508(a), no protest under part 33 is authorized in connection with the issuance or proposed issuance of an order under a task order contract or delivery order contract, except (1) A protest on the grounds that the order increases the scope, period, or maximum value of the contract; or (2)(i) For

agencies other than DoD, NASA, and the Coast Guard, a protest of an order valued in excess of $10 million (41 U.S.C 4106(f)); or (ii) For DoD, NASA, or the Coast Guard, a protest of an order valued in excess of $35 million (10 U.S.C 3406(f))." On the other hand, all "C" contracts, regardless of value, are subject to protest for any number of reasons. "C" type contracts may put procurement and award schedules at greater risk of delay than task orders under a SATOC.

Cost: A SATOC offers significant savings opportunities in terms of administrative costs. A comparison of the estimated administrative costs savings is presented in Table 1 below.

b. Alternative 2, Multiple Award Task Order Contract (MATOC):

Quality: A MATOC would facilitate a more competitive environment throughout the life of the contract via task order competitions for individual requirements; however, the ability to work directly with a single contractor, as would be the case with a SATOC, provides significant advantages. For example, using multiple contractors results in varied and inconsistent levels of quality and performance, repetitive learning curves, and creates the potential for access control issues in secure locations, as well as work conflicts and schedule delays.

Acquisition Cycle: Most of these requirements typically do not develop for execution purposes until the last quarter of the fiscal year, some as late as September. A lead time of approximately 90 days is needed to successfully execute a task order under a MATOC; for a SATOC it is 30 days or less, dependent upon the circumstances. Therefore, using a MATOC would place execution of a significant portion of anticipated contract work at risk of failure, the result of which is a loss of funds. This is an unacceptable risk given that a MATOC does not provide for a lesser degree of consolidation.

Terms and Conditions: Other than request for proposal (RFP) requirements and proposal submissions, there is essentially no difference between the contractual terms and conditions for construction or repair project executed under a MATOC. However, in accordance with RFO 16.508(a), "No protest under part 33 is authorized in connection with the issuance or proposed issuance of an order under a task order contract or delivery order contract, except (1) A protest on the grounds that the order increases the scope, period, or maximum value of the contract; or (2)(i) For agencies other than DoD, NASA, and the Coast Guard, a protest of an order valued in excess of $10 million (41 U.S.C 4106(f)); or (ii) For DoD, NASA, or the Coast Guard, a protest of an order valued in excess of $35 million (10 U.S.C 3406(f)).". On the other hand, all "C" contracts, regardless of value, are subject to protest for any number of reasons. "C" type contracts may put procurement and award schedules at greater risk of delay than task orders under a MATOC.

Costs: Additional resources and greater oversight by the Government is also necessary when dealing with multiple contractors versus a single contractor. This translates into a significant increase in time and costs for which there are no discernible benefits. The small dollar value of the proposed procurement also makes using a MATOC impractical. Based on market research, adequate competition exists to award a single contract valued at $5M; however, it is the Contracting Officer's business judgment that a MATOC structure would present a diluted value to industry and is therefore unlikely to attract the same level of meaningful competition when that $5M in capacity must be shared by multiple contractors.

c. Alternative 3, Multiple Stand-Alone 'C' and 'P' Type Contracts:

SAC also considered the award of multiple stand-alone contracts. While this approach varies little to what the customer is currently experiencing, it does provide a lesser degree of consolidation, or no consolidation at all if individual contracts are awarded for single requirements, the benefits of the SATOC approach substantially exceed the disadvantages of consolidation for the reasons outlined below.

Quality: As already noted under Alternative 1, the ability to work with a single contractor directly on a SATOC tool provides significant advantages in comparison to multiple stand-alone contracts. Using multiple contractors under single awards may cause varied standards of contractor performance and managing the performance increases the risk of poor performances thereby increasing oversight and administrative costs.

Acquisition Cycle: Stand-alone contracts are administratively burdensome because they add additional days to the procurement process. Historically, on SAC's preventative maintenance contracts for MARFORRES, a task order can be executed in less than 30 days. Depending on complexity, a stand-alone contract or purchase order takes anywhere from 45-150 days to award.

Terms and Conditions: Other than request for proposal (RFP) requirements and proposal submissions, there is essentially no difference between the contractual terms and conditions for construction or repair project executed under a SATOC or a "C" contract.

Cost: Additional resources and greater oversight by the Government are also necessary when dealing with multiple contractors versus a single contractor. This translates into a significant increase in time and costs for which there are no discernible benefits.

Cost Savings: Pursuant to 15 U.S.C. § 657q(c)(2)(B), "savings in administrative or personnel costs alone do not constitute a sufficient justification for a consolidation of contract requirements" unless the total amount of the cost savings is expected to be substantial in relation to the total cost of the procurement. In this case, cost savings are substantial in relation to

the total cost of the procurement. Table 1 shows the pre-award cost savings between awarding four consolidated contracts vs awarding contracts for individual services (non-consolidation). Table 2 shows the post-award cost savings between awarding four consolidated contracts vs awarding contracts for individual services (non-consolidation). Table 3 adds Tables 1 and 2 together to show total cost savings.

d. Alternative 4, Multiple (2) Single Award Task Order Contract (SATOC) Contracts:

SAC also considered the award of multiple SATOC contracts. While this approach varies little to what the preferred consolidated SATOC, it does provide a lesser degree of consolidation, if individual SATOCs are awarded for individual regions, the benefits of the consolidated SATOC approach substantially exceed the disadvantages of consolidation for the reasons outlined below.

Quality: As already noted under Alternative 1, the ability to work with a single contractor directly on a SATOC tool provides significant advantages in comparison to multiple SATOC contracts. Using multiple contractors under single SATOC awards may cause varied standards of contractor performance and managing the performance increases the risk of poor performances thereby increasing oversight and administrative costs.

Acquisition Cycle: Separate SATOC contracts are administratively burdensome because they duplicate the procurement process, as well as the post award administration.

Terms and Conditions: Other than duplicating request for proposal (RFP) requirements and proposal submissions, there is essentially no difference between the contractual terms and conditions for construction or repair project executed under a consolidated SATOC or multiple SATOCS.

Cost: Additional resources and greater oversight by the Government are also necessary when dealing with multiple contractors versus a single contractor. This translates into a significant increase in time and costs for which there are no discernible benefits.

Cost Savings: Pursuant to 15 U.S.C. § 657q(c)(2)(B), “savings in administrative or personnel costs alone do not constitute a sufficient justification for a consolidation of contract requirements” unless the total amount of the cost savings is expected to be substantial in relation to the total cost of the procurement. In this case, cost savings are substantial in relation to the total cost of the procurement. Table 1 shows the pre-award cost savings between awarding two consolidated contracts vs awarding contracts for individual services (non-consolidation). Table 2 shows the post-award cost savings between awarding four consolidated contracts vs awarding contracts for individual services (non-consolidation). Table 3 sums Tables 1 and 2 together to

show total cost savings.

Table 1- Pre-Award Cost Savings, Consolidation vs Non-consolidation

SAC In-House Cost of Approach Acquisition							
Consolidation			Non-Consolidation			Single SATOC Per Site	
Stand up FFP/SATOC (multi site)			**Award from "C" or "P" type RFP**				
Procurement Action and Associated in-house Labor Effort	Funds Reqd.		Procurement Action and Associated in-house Labor Effort			Procurement Action and Associated in-house Labor Effort	Funds Reqd.
CECT-SAC Labor Funds	[redacted]		CECT-SAC Labor Funds	[redacted]		CECT-SAC Labor Funds	[redacted]
CESAC-PM/CESAC-EN Labor Funds			CESAC-PM/CESAC-EN Labor Funds			CESAC-PM/CESAC-EN Labor Funds	
SSEB Labor Funds (*Note 1)			SSEB Labor Funds			SSEB Labor Funds (*Note 4)	
Other (if discussions/negotionation reqd)			Other (if discussions/negotionation reqd)			Other (if discussions/ negotionation reqd)	
Other (if debriefings are req'd)			Other (if debriefings are req'd)			Other (if debriefings are req'd)	
Subtotal		VS	Subtotal (per RFP)		VS	Subtotal	
IDIQ Task Order			RFP Estimated (*Note 3)			**IDIQ Task Order**	
CECT-SAC Labor Funds						CECT-SAC Labor Funds	
CESAC-PM/CESAC-EN Labor Funds			Program, Total			CESAC-PM/CESAC-EN Labor Funds	
Subtotal (per TO)						Subtotal (per TO)	
TO's Estimate (*Note 2)						TO's Estimate (*Note 5)	
Subtotal						**Subtotal**	
Total Cost of Approach for One Regional Contract						Total Cost of Approach for One Regional Contract	
Program						Program	
Regional Contract (#)						Number of Sites	
Program Total						**Program Total**	

[redacted]

Table 2- Post-Award Cost Savings, Consolidation vs Non- consolidation

SAC In-House Cost of Approach Administrative							
Consolidation			Non-Consolidation			Single SATOC Per Site	
Action	Funds Reqd.		Action	Funds Reqd.		Action	Funds Reqd.
Invoicing (per contract)			Invoicing			Invoicing (per contract)	
CESAC-PM / CESAC-EN Labor Funds	[redacted]		CESAC-PM / CESAC-EN Labor Funds	[redacted]		CESAC-PM / CESAC-EN Labor Funds	[redacted]
TO Estimate (*Note 1)			TO Estimate (*Note 3)			TO Estimate (*Note 5)	
Subtotal			Subtotal			Subtotal	
TO Quality Assurance		VS	TO Quality Assurance		VS	TO Quality Assurance	
CESAC-PM / CESAC-EN Labor Funds			CESAC-PM / CESAC-EN Labor Funds			CESAC-PM / CESAC-EN Labor Funds	
QA Estimate (*Note 2)			QA Estimate (*Note 4)			QA Estimate (*Note 2)	
Subtotal			Subtotal			Subtotal	
Total Cost of Approach for one Regional Contract			Program Total			Total Cost of Approach for one Regional Contract	
Program						Program	
Number of Regional Contracts						Number of SATOC Contracts	
Program, Total						Program, Total	

[redacted]

Table 3- Summary of Cost Savings, Consolidation vs Non-consolidation

SAC In-House Cost of Approach Administrative							
Consolidation (Single Multi Site Contract)			Non-Consolidation			Single SATOC Per Site	
Pre-Award Cost	[redacted]		Pre-Award Cost	[redacted]		Pre-Award Cost	[redacted]
Post-Award Cost		VS.	Post-Award Cost		VS.	Post-Award Cost	
Total:			**Total:**			**Total:**	

Consolidation of the requirements will result in benefits from the closest alternative estimated at [redacted], as well as substantial benefits estimated at [redacted] with approximately [redacted] in savings with the furthest alternative, as demonstrated in Table 3. The benefits meet or exceed the requirements per RFO 7.107-2(c)(3)(i) of 10% of the estimated

contract value, for contracts below $94 million. Although the four (4) alternative contract types listed above clearly possess their respective advantages, this benefit analysis demonstrates that the benefits from consolidating the types of services to be included in the RFP for the subject requirement via the procurement of a single consolidated SATOC substantially exceed the benefits of each of the alternative strategies. A summary of the costs/benefits of each of the alternatives is presented below in Table 4.

Table 4 – Alternatives Analysis Summary

	Alternative1	Alternative 4	Alternatives 2/3
	1 SATOC Award	2 SATOC Awards	Multiple Award Stand Alone
Quality	Average to High	Average to High	Low
Acquisition Cycle *	Base Contract – 140 Days Task orders - 30 days or less	Base Contract – 140 Days Task orders - 30 days or less	90 days or less
Terms and Conditions	No Difference	No Difference	No Difference
Administrative Cost	Lowest	Middle	Highest

6. **Bundling:**

a. Definition of Bundling: RFO 2.101 defines bundling as consolidating two (2) or more requirements for supplies or services, previously provided or performed under separate smaller contracts, into a solicitation for a single contract that is likely to be unsuitable for award to a small business concern due to: (i) The diversity, size or specialized nature of the elements of the performance specified. (ii) The aggregate dollar value of the anticipated award; (iii) The geographical dispersion of the contract performance sites; or (iv) Any combination of the factors described in paragraphs (1)(i) through (iii) of this definition.

b. Applicability of RFO Bundling Definition: Since this acquisition is to be set aside for small business concerns, it does not meet the definition of bundling.

c. Definition of the Competition in Contracting Act (CICA) Bundling Principle: This principle, as developed by GAO case law, focuses on whether the combined requirement (new, old, or otherwise) restricts competition, and whether the agency is consolidating or bundling a new requirement unnecessarily. In order to justify CICA Bundling, the agency must show "a reasonable basis for why the bundling is necessary to meet the agency need." (*Vantex Serv., Inc.*, B-29041 5, Aug. 8, 2002, and *Outdoor Venture Corp.*, B-299675; B-299676, Jul.

19, 2007). The CICA requires solicitations to provide for full and open competition except where restrictions on competition are necessary to satisfy the procuring agency's needs. In such a case, restrictions on competition are allowed but only to the extent necessary to satisfy the agency's needs. Bundled procurements combine separate requirements into one contract; thus, they have the potential to restrict competition in violation of CICA by excluding firms that can provide only one portion of the bundled requirement.

d. Applicability of CICA Bundling Principle: In this procurement, the CICA Bundling Principle is applicable, but necessary in meeting the agency's need to deliver its customer's mission objectives, increase efficiency, streamline processes, ensure operational continuity, decrease costs and provide faster response times. The CICA requires solicitations to provide for full and open competition except where restrictions on competition are necessary to satisfy the procuring agency's needs. In such a case, restrictions on competition are allowed but only to the extent necessary to satisfy the agency's needs. Bundled procurements combine separate requirements into one contract; thus, they have the potential to restrict competition, thus being in violation of CICA by excluding firms that can provide only a portion of the bundled requirement. However, substantial cost savings achieved through the reduction of duplicative efforts and operational efficiency can be a reasonable basis for restricting competition where requirements are bundled. Here, using a single SATOC will consolidate the requirements for facility investment, custodial, pest control, refuse collection and recycling, grounds maintenance, and pavement clearance (snow removal), and will provide an acquisition tool to enable these services to be procured more cost effectively, and services more efficiently provided.

7. **Considerations, Facts, Reasoning Supporting the Determination:** All facts, considerations and rationale have been covered previously in the findings. The DD 2579 has been signed by the Contracting Officer, and Chief for the Office of Small Business Programs. As demonstrated by the signatures below, the Contracting Officer and Chief for the Office of Small Business Programs concur that consolidation of this requirement is both necessary and justified.

8. **Summary:** Based on the market research and analysis of the four (4) alternatives provided herein supports the conclusion that consolidation of the Northeast AbilityOne Region Facility Support Services is justified and necessary based on acquisition regulation and guidance. The SATOC acquisition approach will enhance the contracting tools available to MARFORRES and allow maximum flexibility that provides a means to meet its mission. In accordance with RFO 8.104 this acquisition will be a Total Small Business Set-Aside. A minimum of 3 contractors will be solicited; however, to obtain maximum competition throughout the MAS, all Small Business contractors will be given a fair opportunity to compete for this action by issuance of the eBuy RFQ (request for quote).

CONSOLIDATION OF CONTRACT REQUIREMENTS DETERMINATION
for
W912HP26XXXX
Single Award Task Order Contract
For Facility Investment Services
Marine Forces Reserve (MARFORRES) Northeast AbilityOne Region

COORDINATION:

[redacted]

[redacted]

DETERMINATION

Based on the foregoing rationale, I hereby determine, pursuant to the Federal Acquisition Regulation Supplement 7.107-2 and Army Federal Acquisition Regulation Supplement 5107.107, that the consolidation of the requirements for a Single Award Task Order Contract for Facility Investment Services Marine Forces Reserve (MARFORRES) Northeast AbilityOne Region is both necessary and justified and will serve the best interests of the Government.

[redacted]