



OFFICE OF THE UNDER SECRETARY OF DEFENSE

3000 DEFENSE PENTAGON
WASHINGTON, DC 20301-3000

JUL 26 2007

ACQUISITION,
TECHNOLOGY
AND LOGISTICS

DPAP

MEMORANDUM FOR DIRECTORS DEFENSE AGENCIES
DEPUTY ASSISTANT SECRETARY OF THE ARMY
(POLICY AND PROCUREMENT), ASA(ALT)
DEPUTY ASSISTANT SECRETARY OF THE NAVY
(ACQUISITION & LOGISTICS MANAGEMENT),
ASN(RDA)
DEPUTY ASSISTANT SECRETARY OF THE AIR FORCE
(CONTRACTING), SAF/AQC

SUBJECT: Enhancing Competition in Defense Acquisition

By memorandum of May 31, 2007 (attached), the Administrator, Office of Federal Procurement Policy (OFPP), reemphasized that competition is the cornerstone of our acquisition system and that the benefits of competition are well established. However, the Administrator noted that we are not receiving full advantage of competition, especially in the placement of orders under multiple-award contracts.

OFPP used Federal Procurement Data System (FPDS) data to assess competition achieved by each Executive Agency in FY 2006. I have requested the Defense Manpower Data Center to provide me monthly reports for each DoD Component on competitive contracts and fair opportunity for orders placed against multiple award contracts which I will share with you.

OFPP addressed the annual competition report, required by FAR Subpart 6.5, suggesting additional areas for consideration; and requested that the report for Fiscal Year 2007 be submitted by December 20, 2007. Within DoD, individual Component reports will be consolidated into a single DoD report that will be submitted to OFPP. As such, please submit your Component competition report by December 10, 2007.

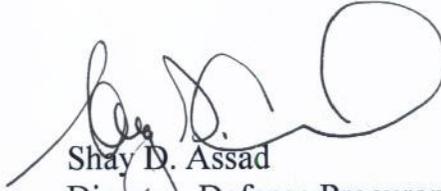
Finally, OFPP indicated it will pursue changes to the Federal Acquisition Regulation to strengthen competition policies and will explore new standard reports to better differentiate competitive actions.



Given the importance of competition to our business, we need to dedicate greater emphasis toward promoting competition—including placement or orders against multiple award contracts—to the maximum extent practicable. Timely and accurate contract action reporting in FPDS is one of the most effective tools to better understanding our competition efforts.

At Attachment 2 is a discussion of the key fields associated with reporting competition in FPDS to assist in accurate reporting. The FPDS derives the Extent Competed for DoD contracts based on the Contracting Officer's entries for Solicitation Procedures, Type of Set-Aside, and Reason Not Competed. Attachment 3 explains the basis for the FPDS derivation of Extent Competed. We are working with OFPP and the Civilian agencies to standardize and improve procedures for reporting competition related information.

Please identify your agency point of contact for competition to Ms. Teresa Brooks by August 3, 2007, so this individual can be consulted on evolving competition matters. Ms. Brooks may be reached at teresa.brooks@osd.mil or 703-697-6710. Annual Component competition reports shall be submitted directly to Ms. Brooks.



Shay D. Assad
Director, Defense Procurement and
Acquisition Policy

Attachments
As stated



EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
WASHINGTON, D.C. 20503

OFFICE OF FEDERAL
PROCUREMENT POLICY

May 31, 2007

MEMORANDUM FOR CHIEF ACQUISITION OFFICERS
SENIOR PROCUREMENT EXECUTIVES

FROM:

Paul A. Denett
Administrator

SUBJECT:

Enhancing Competition in Federal Acquisition

Competition is the cornerstone of our acquisition system. The benefits of competition are well established. Competition saves money for the taxpayer, improves contractor performance, curbs fraud, and promotes accountability for results. The acquisition workforce has a number of tools to facilitate the efficient and effective use of competition. I am concerned that we are not taking full advantage of these tools, especially in the placement of task and delivery orders under indefinite-delivery vehicles. The purpose of this memorandum is to request your help and leadership in reinforcing the use of competition and related practices for achieving a competitive environment.

Data from the Federal Procurement Data System (FPDS) shows that the overall percentage of dollars competed has remained relatively constant since FY 1990 (see Attachment 1). However, agency reviews, reviews by the Government Accountability Office (GAO), and audits by the Inspectors General have found that the government frequently misses opportunities to take full advantage of competition when placing orders. Inadequate planning, insufficient market research, and poor coordination among program and acquisition offices lead to ill-defined requirements, lack of head-to-head competition for task-specific solutions and pricing, and the absence of meaningful performance standards to measure results. Many of these weaknesses were cited in the report by the Acquisition Advisory Panel, established under the Services Acquisition Reform Act (the "SARA Panel").

The lack of meaningful competition for orders has taken on increased significance in recent years with the growth of obligations through task and delivery orders. Although preliminary analysis suggests new contracts are down, FPDS shows that agency expenditures through orders under contracts have grown significantly, from approximately 14 percent of total dollars obligated in FY 1990 to about 52 percent of total dollars obligated in FY 2005 (see Attachment 2). A substantial amount of these obligations have been made through modifications.

We must reinvigorate the role of the competition advocate. As you know, the Office of Federal Procurement Policy Act requires each agency to designate a competition advocate to promote competition and challenge barriers to competition in agency acquisitions. The competition advocate's responsibilities, which are described in FAR Subpart 6.5, include preparing an annual report. To ensure that we are getting the best value for the taxpayer, I ask

that you work closely with your competition advocate to evaluate the overall strength of your agency's competition practices. In particular, the advocate should review the level of competition at your agency (see Attachment 3) and develop plans and goals for maximizing competition. Several questions are provided at Attachment 4 to help the advocate identify if your agency's practices are conducive to competition. Your competition advocate should provide a written report to you with appropriate analysis, including a trend analysis, and recommendations. The report should be completed by December 20, 2007, and annually thereafter. A copy of the first annual report should be provided to the Office of Federal Procurement Policy (OFPP).

In addition, I will be asking the Federal Acquisition Regulatory Council (FAR Council) to strengthen competition policies in the Federal Acquisition Regulation (FAR), including associated transparency and management practices. Some proposals include:

- Requiring that annual reviews by the competition advocate be provided in writing to both the Chief Acquisition Officer (CAO) and Senior Procurement Executive and specifically address the quality of planning, executing, and managing task and delivery orders over \$1 million;
- Limiting the length of contracts awarded noncompetitively under urgent and compelling circumstances to the minimum contract period necessary to meet requirements, and no longer than one year unless approved by the head of the contracting activity;
- Providing notice in FedBizOpps of awards of sole source orders;
- Strengthening competition rules for the Multiple Award Schedules (MAS) to generally ensure the receipt of three proposals and for other multiple award contracts to ensure fair notice is being provided to contract holders; and
- Identifying evaluation factors and significant subfactors for large task and delivery orders that have statements of work to support meaningful comparison and discrimination between and among competing proposals.

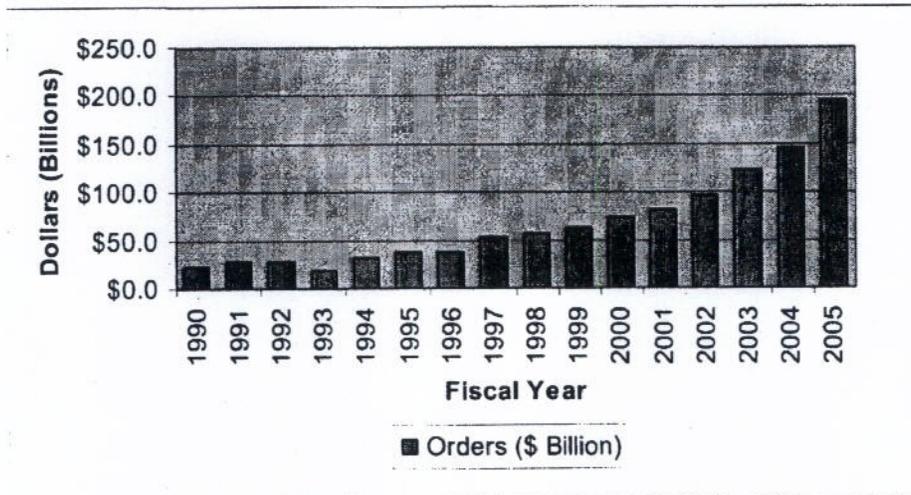
OFPP will also ask the General Services Administration (GSA) to centralize market research information related to products and services acquisitions and make it available for government-wide use. The SARA Panel included many of these recommendations in its report.

Finally, OFPP has requested that GSA develop new standard FPDS reports on contract actions. These efforts complement agency actions to verify and validate the accuracy of data entered in FPDS (see OFPP Memorandum to CAOs dated March 9, 2007). FPDS collects data on different types of actions, such as new contracts, new task and delivery orders, and modifications to contracts. The implications for competition and workload vary depending on the type of action. For example, a new contract action may have significant implications for competition and workload, whereas the issuance of a modification to change the contractor's address has no bearing on competition and the substantive workload of the contracting officer. The new standard reports will more clearly differentiate types of actions, which will enable better trend analysis of competed contract actions and a clearer understanding of the relative impact of recent years' activity on our acquisition workforce.

We must work together to maximize the meaningful use of competition and achieve the best return on investment possible for our taxpayers. The initiatives described in this memorandum will require additional effort by our workforce. However, with your continued help, we will be well positioned to meet this challenge. According to statistics compiled by the Office of Personnel Management, the number of contract specialists in the 1102 series has grown from approximately 26,600 to 27,900 between 2001 and 2006. In the last three years alone, we have added more than 1,000 contract specialists. Civilian agencies' responses to the 2007 contracting workforce competencies survey (see OFPP Memorandum to CAOs dated March 7, 2007), and the Department of Defense's competency modeling, will facilitate the timely closure of remaining skills and competency gaps, including those associated with planning and conducting competitions.

Please ensure broad dissemination of this memorandum among agency personnel who have responsibilities for the effective planning, execution, and management of your acquisitions. Questions may be referred to Pat Corrigan at (202) 395-6805 or pcorrigan@omb.eop.gov or to Mathew Blum at (202) 395-4953 or mblum@omb.eop.gov.

Agency Expenditures through Task and Delivery Orders Under Existing Contracts



Source: FPDS (as of 4/19/07). Reflects dollars obligated under task and delivery order contracts.

Agency Use of Competition¹
From Greatest Use to Least Use
FY 2006

Agency ²	Competition Base ³ (in billions) FY 2006	Dollars Competed ⁴ (in billions) FY 2006	Percentage Competed FY 2006	Percentage Competed FY 2005 Ranking
1. LABOR	\$1.6	\$1.4	86	1
2. HEALTH AND HUMAN SERVICES	\$12.1	\$9.8	81	4
3. ENVIRONMENTAL PROTECTION AGENCY	\$1.1	\$0.9	80	7
4. AGRICULTURE	\$3.5	\$2.7	78	2
5. INTERIOR	\$4.0	\$3.0	75	8
6. TREASURY	\$2.1	\$1.5	74	8
7. COMMERCE	\$1.7	\$1.3	73	6
8. ENERGY	\$21.8	\$15.3	70	8
8. EDUCATION	\$1.2	\$0.9	70	3
8. GENERAL SERVICES ADMINISTRATION	\$7.9	\$5.5	70	5
8. JUSTICE	\$2.1	\$1.4	70	8
12. HOUSING AND URBAN DEVELOPMENT	\$1.0	\$0.7	69	13
13. DEFENSE	\$296.6	\$188.1	63	12
14. TRANSPORTATION	\$1.1	\$0.7	61	16
15. STATE	\$4.0	\$2.3	58	15
16. VETERANS AFFAIRS	\$4.6	\$2.3	51	17
17. NATIONAL AERONAUTICS AND SPACE ADMINISTRATION	\$13.0	\$6.5	50	18
18. HOMELAND SECURITY	\$12.5	\$6.1	49	14
Total⁵	\$392	\$250.4	64	64

Source: FPDS (as of 2/7/07)

1. FPDS Standard Competition Report by Agency.
2. Listed agencies have competition base of \$1 billion or greater in FY 2006.
3. These figures include dollars obligated on actions that are not available for competition, such as awards made to a mandatory source. These dollars represent a small portion of the total dollars obligated.
4. These figures include dollars obligated on actions coded as full and open competition (including those competed after exclusion of sources), competed under the Simplified Acquisition Threshold, and competitive orders.
5. Total includes expenditures by listed agencies only. Agencies with competition bases less than \$1 billion in FY 2006 cumulatively competed 75 percent of their competition base, or \$1.8 billion of \$2.4 billion.

Assessment of Competition Practices

The following illustrative questions are designed to assist competition advocates in assessing the quality of competition practices and policies at their agencies. Reviews should give special attention to work awarded through orders, especially orders above \$1 million.

As part of their reviews, advocates should evaluate the quality of acquisition planning and contract management practices, as these steps are critical to reaping the benefits of competition. Advocates are encouraged to supplement their reviews with additional considerations, as appropriate.

A. Ensuring sufficient attention to the manner in which acquisitions are planned

1. Are cross-functional teams, including end-users and acquisition officials used to develop project acquisition plans and strategies and requirements documents?
2. Do acquisition plans explain how competition will be sought, promoted, and sustained throughout the course of the acquisition?
3. Do acquisition plans for large requirements consider, as appropriate, the comparative benefits of awarding a new contract versus placing an order under an existing contract?
4. Do program officials expressly concur on requirements documents?
5. Are the market research techniques outlined in FAR 10.002(b)(2) being used, such as:
 - a. publishing formal requests for information in appropriate technical or scientific journals or business publications;
 - b. querying government and commercial databases that provide information relevant to the acquisition; and
 - c. participating in interactive, on-line communication among industry, acquisition, personnel, and customers.
6. Are plans in place to provide maximum practicable opportunities for small businesses both in prime contracting and subcontracting?
7. If acquisition plans anticipate contract bundling, or contract consolidation in the case of the Department of Defense, have written justifications for these actions and appropriate analyses been developed?

B. Using competition in an effective manner

1. Do statements of work, including those in task and delivery orders, have:
 - a. sufficient information, stated clearly, so that offerors may make informed business decisions on whether to respond and perform the due diligence necessary to propose the best solutions possible?
 - b. clear performance measures and expectations related to quality, responsiveness, timeliness, and cost?
2. Does the agency consider complexity, commerciality, availability, and urgency in establishing offeror response times? Has sufficient time been built into the acquisition schedule to maximize competition and encourage contractors to provide quality proposals that would allow for a best value award based on initial offers?
3. Is the agency taking recent and relevant past performance into account, including quality, timeliness, and cost control? Is the agency using the Past Performance Information Retrieval System?
4. Does the documentation for source selection decisions include the rationale for any tradeoffs made or relied on by the source selection authority, including the benefits associated with additional costs?
5. Are orders under indefinite-delivery vehicles reported to FPDS as non-competitive when competition is not used?

C. Emphasizing sound contract management and oversight

1. Are properly trained contracting officer representatives and contracting officer technical representatives designated for contracts (including indefinite delivery contracts and task orders) before contract performance begins?
2. Does the agency have appropriate processes in place to ensure that proposed modifications are within the scope of the contract or order?
3. Are quality assurance surveillance plans included in the contracts?

KEY FIELDS ASSOCIATED WITH COMPETITION

Multiple or Single Award IDC (FPDS Element 6E)

Multiple Award - Select multiple award when the contract is: (1) one of several indefinite-delivery indefinite-quantity (IDIQ) contracts awarded under a single solicitation in accordance with FAR 16.504(c); or (2) one of several Blanket Purchase Agreements awarded against a Federal Supply Schedule in accordance with FAR 8.405-3(b); or (3) any other IDIQ contract that an agency enters into with two or more sources under the same solicitation when contracting officers are required to compare or compete their requirements among several vendors.

Single Award – Select single award when the contract does not satisfy the above criteria for a multiple award.

Solicitation Procedures (FPDS Element 10M) – When only one source is solicited enter Single Source Solicited. Otherwise, select the appropriate entry from the list below.

Single Source Solicited – Report this code if no solicitation procedure was used or only one source is solicited for the action, to include orders placed against multiple award contracts where only a single source was solicited.

Negotiated Proposal/Quote – Report this code for contact actions that use negotiated procedures (FAR 12, 13, or 15).

Sealed Bid – Report this code for contact actions using sealed bid procedures (FAR 14).

Two Step – Report this code for contact actions that use a combination of sealed bids and negotiated procedures (FAR 6.102).

Architect-Engineer FAR 6.102 – Report this code if the action resulted from selection of sources for architect-engineer contracts pursuant to FAR 6.102(d)(1).

Basic Research – Report this code if the action resulted from a competitive selection of basic research proposals pursuant to FAR 6.102(d)(2).

Alternative Sources – Report this code if the action resulted from use of procedures that provided for full and open competition after exclusion of sources to establish or maintain alternative sources pursuant to FAR 6.202.

Multiple Award Fair Opportunity – Report this code for orders placed against multiple award contracts that provided for fair opportunity pursuant to DFARS 208.405-70 and FAR/DFARS 16.505/216.505-70.

Extent Competed (FPDS Element 10A) – This field is a system derived field for DoD. FPDS derives a value for Extent Competed based upon the Contracting Officer entries in the FPDS fields: Type of Solicitation Procedures, Type of Set-Aside, and Reason Not Competed. The entries for Type of Set-Aside and Reason Not Competed must track to the acquisition documents for the contract action. The basis for the derivation of Extent Competed is explained in Attachment 3 and the options DoD uses for Extent Competed are identified below. At this time, Extent Competed for orders placed by DoD pulls from the basic contract.

KEY FIELDS ASSOCIATED WITH COMPETITION

<p>Full and Open Competition (F&OC) – The system will derive this code for the action if it resulted from an award pursuant to FAR 6.102(a) – sealed bid, FAR 6.102(b) – competitive proposal, FAR 6.102(c) – combination, or any other competitive method that did not exclude sources of any type.</p>
<p>Not Available for Competition – The system will derive this code if the action is not available for competition (e.g., single source actions authorized by statute, international agreement, for utilities, or for resale).</p>
<p>Not Competed – The system will derive this code when the action is not competed.</p>
<p>F&OC after exclusion of sources – this code is derived when sources are excluded before competition. (NOTE: This terminology is broader than FAR 6.2 (which includes set-aside actions and actions to establish or maintain alternate sources) in that it also includes actions justified by a J&A that provided for competition.)</p>
<p>NOTE: DoD does not currently use any other of the FPDS Extent Competed codes, to include Follow-on to Competed Action (which is captured in the Reason Not Competed field in FPDS).</p>

Statutory Exception to Fair Opportunity (FPDS Element 10R) – This field is the basis for determining whether competition is provided for on orders placed against multiple award contracts. Accordingly, this field must be entered for orders against IDIQ contracts coded multiple award (to include DoD contracts, FSS contracts and Government-wide contracts). If you find that FSS contracts or multiple award Government-wide contracts do not reflect that they are multiple award contracts (and thus you are not able to complete this field), please advise your Agency FPDS POC so the contracting office for the multiple award contract can be notified and pursue correction.

<p>Urgency – report this code if the action was justified pursuant to FAR 16.505(B)(2)(i)</p>
<p>Only One Source – Other – report this code if the action was justified pursuant to FAR 16.505(B)(2)(ii).</p>
<p>Follow-on Delivery Order Following Competitive Initial Order – report this code if the action was justified pursuant to FAR 16.505(B)(2)(iii)</p>
<p>Minimum Guarantee – report this code when it was necessary to place an order to satisfy minimum amount guaranteed to the contractor. See FAR 16.505(b)(2)(iv).</p>
<p>Other Statutory Authority – report this code when statute expressly authorizes or requires that the purchase made by the action be made from a specified source (DFARS 208.405-70(b)(1)).</p>
<p>No Exception – Fair Opportunity Given – report this code when fair opportunity has been given pursuant to DFARS 208.405-70 or DFARS 216.505-70.</p>

Derivation of Extent Competed
(Updated June 2007)

For the Type of Set Aside column (Column no. 2):

Set Asides Used includes the following values: HUB Zone Set Aside, SDVOSB Set Aside, Small Business Set Aside – Partial, Small Business Set Aside – Total, 8a Competed, 8(a) with HUB Zone Preference, Emerging Small Business, HBCU MI Set Aside – Partial and HBCU MI Set Aside – Total

Sole Sources include the following values: HUB Zone Sole Source, SDVOSB Sole Source, 8(a) Sole Source

This table Shows Derivation of Extent Competed For Definitive Contract Actions, Purchase Orders and Indefinite Delivery Vehicles

Solicitation Procedures	Type of Set Aside	Reason Not Competed	Extent Competed	Examples
Single Source Solicited	Sole Sources No Set Aside Used	Authorized by Statute	Not Available for Competition	If Single Source Solicited and Directed Sole Source (e.g., 8(a)) and Authorized by Statute [then Not Available for Competition is the derivation]
	Sole Sources	Other than "Authorized by Statute"	No derivation Note: Rule ensures that this combination is not selected.	Invalid Combination
	Sole Sources	blank	No derivation Note: Rule ensures that this combination is not selected.	Invalid Combination

Solicitation Procedures	Type of Set Aside No Set Aside Used	Reason Not Competed International Agreement, Utilities, Authorized for Resale.	Extent Competed Not Available for Competition	Examples If Single Source Solicited and No Set Aside Used and One of the 3 Authorities (e.g., Resale) [then Not Available for Competition is the derivation]
	No Set Aside Used	Unique Source, Follow-on Contract, Unsolicited Research Proposal, Patent/Data Rights, Standardization, Only One Source- Other, Urgency Mobilization, Essential R&D, National Security or Public Interest, Authorized By Statute	Not Competed	If Single Source Solicited and No Set Aside Used and One of the cited Authorities (e.g., Data Rights) [then Not Competed is the derivation]
	No Set Aside Used	blank	No derivation Note: Rule ensures that this combination is not selected.	Invalid Combination
	Any Set Asides	-	No derivation Note: Rule ensures that this combination is not selected.	Invalid Combination

Solicitation Procedures	Type of Set Aside	Reason Not Competed	Extent Competed	Examples
Negotiated Proposal/ Quote, Sealed Bid or Two step	No Set Aside Used	Blank	Full and Open Competition	If Negotiated Proposal/ Quote, Sealed Bid or Two step and No Set Aside Used and Reason Not Competed is BLANK [then Full and Open Competition is the derivation]
	No Set Aside Used	Unique Source, Follow On Contract, Patent / Data Rights, Standardization, Urgency, Mobilization, Essential R&D, National Security and Public Interest.	Full and Open After Exclusion of Sources*	If Negotiated Proposal/ Quote, Sealed Bid or Two step and No Set Aside Used and Reason Not Competed is one of the cited reasons (e.g., Public Interest [then Full and Open Competition After Exclusion of Sources is the derivation]
	No Set Aside Used	International Agreement, Authorized for resale	No derivation Note: Rule ensures that this combination is not selected.	Invalid Combination
	No Set Aside Used	Authorized by Statute	No derivation Note: Rule ensures that this combination is not selected.	Invalid Combination
	No Set Aside Used	Unsolicited Research Proposal, Only one source – other	No derivation Note: Rule ensures that this combination is not selected.	Invalid Combination

* NOTE: For FPDS purposes, F&OC After Exclusion of Sources is broader than FAR 6.2 (which includes set-aside actions and actions to establish or maintain alternate sources) and also includes actions justified by a J&A that provide for competition.

Solicitation Procedures	Type of Set Aside Set Asides Used	Reason Not Competed	Extent Competed Full and Open After Exclusion of Sources*	Examples
		Blank		If Negotiated Proposal/ Quote, Sealed Bid or Two step and One of the Set Asides Used (e.g., SB Set Aside) and Reason Not Competed is BLANK
	Set Asides Used	International Agreement, Authorized by Statute, Authorized for resale, Utilities, Unique Source, Follow On Contract, Patent / Data Rights, Standardization, Urgency, Mobilization & Essential R&D, National Security, Public Interest, Unsolicited Research Proposal, Only one source - other	No derivation Note: Rule ensures that this combination is not selected.	[then Full and Open Competition After Exclusion of Sources is the derivation] Invalid Combination
	Sole Sources	-	No derivation Note: Rule ensures that this combination is not selected.	Invalid Combination

* NOTE: For FPDS purposes, F&OC After Exclusion of Sources is broader than FAR 6.2 (which includes set-aside actions and actions to establish or maintain alternate sources) and also includes actions justified by a J&A that provide for competition.

Solicitation Procedures	Type of Set Aside	Reason Not Competed	Extent Competed	Examples
Architect- Engineer	No Set Aside Used	Blank	Full and Open Competition	If Architect Engineer Procedure and No Set Aside Used and Reason Not Competed is BLANK [then Full and Open Competition is the derivation] Invalid Combination
	No Set Aside Used	Other than Blank	No derivation Note: Rule ensures that this combination is not selected.	
	Set Aside Used	Blank	Full and Open After Exclusion of Sources*	If Architect Engineer Procedure and One of the Set Asides Used (e.g., SB Set Aside) and Reason Not Competed is BLANK [then Full and Open Competition After Exclusion of Sources is the derivation] Invalid Combination
	Set Aside Used	Other than Blank	No derivation Note: Rule ensures that this combination is not selected.	
	Sole Sources	-	No derivation Note: Rule ensures that this combination is not selected.	Invalid Combination

* NOTE: For FPDS purposes, F&OC After Exclusion of Sources is broader than FAR 6.2 (which includes set-aside actions and actions to establish or maintain alternate sources) and also includes actions justified by a J&A that provide for competition.

Solicitation Procedures	Type of Set Aside	Reason Not Competed	Extent Competed	Examples
Basic Research	No Set Aside Used	Blank	Full and Open Competition	If Basic Research Procedure and No Set Aside Used and Reason Not Competed is BLANK [then Full and Open Competition is the derivation] Invalid Combination
	No Set Aside Used	Other than Blank	No derivation Note: Rule ensures that this combination is not selected.	
	Set Aside Used	Blank	Full and Open After Exclusion of Sources.*	If Basic Research Procedure and One of the Set Asides Used (e.g., SB Set Aside) and Reason Not Competed is BLANK [then Full and Open Competition After Exclusion of Sources is the derivation] Invalid Combination
	Set Aside Used	Other than Blank	No derivation Note: Rule ensures that this combination is not selected.	
	Sole Sources	-	No derivation Note: Rule ensures that this combination is not selected.	Invalid Combination

* NOTE: For FPDS purposes, F&OC After Exclusion of Sources is broader than FAR 6.2 (which includes set-aside actions and actions to establish or maintain alternate sources) and also includes actions justified by a J&A that provide for competition.

Solicitation Procedures	Type of Set Aside	Reason Not Competed	Extent Competed	Examples
Alternate Sources	No set aside used	Blank	Full and Open After Exclusion of Sources*	If Alternate Sources Procedure and No Set Aside Used and Reason Not Competed is BLANK [then Full and Open Competition After Exclusion of Sources is the derivation] Invalid Combination
	No Set Aside Used	Other than Blank	No derivation Note: Rule ensures that this combination is not selected.	
	Set Asides used	blank	Full and Open After Exclusion of Sources*	If Alternate Sources Procedure and One of the Set Asides Used (e.g., SB Set Aside) and Reason Not Competed is BLANK [then Full and Open Competition After Exclusion of Sources is the derivation] Invalid Combination
	Set Asides used	Other than blank	No derivation Note: Rule ensures that this combination is not selected.	
	Sole Sources	-	No derivation Note: Rule ensures that this combination is not selected.	Invalid Combination

* NOTE: For FPDS purposes, F&OC After Exclusion of Sources is broader than FAR 6.2 (which includes set-aside actions and actions to establish or maintain alternate sources) and also includes actions justified by a J&A that provide for competition.