

General Services Administration
Washington, DC 20405

APD 2800.12B, Change 77
September 30, 2016

GSA ORDER

Subject: General Services Administration Acquisition Manual; GSAM Case 2016-G504, Consolidation and Bundling of Contract Requirements.

1. **Purpose.** This order transmits a revision to the General Services Administration Acquisition Manual (GSAM).
2. **Background.** The Fiscal Year 2013 (FY13) National Defense Authorization Act (NDAA) added statutory requirements for consolidation and bundling procurements. GSA added consolidation and bundling guidance to the GSAM in July 2013 (Case 2013-G505) while the statutory requirements were being incorporated into regulation. In November 2013, the U.S. Government Accountability Office (GAO) issued a report (GAO-14-36) entitled Updated Guidance and Reporting Needed for Consolidated Contracts, which recommended GSA expeditiously update or establish agency guidance for consolidated contracts.

The Small Business Administration (SBA) incorporated the FY13 NDAA requirements through a final rule on October 2, 2013 (78 FR 61113). The Federal Acquisition Regulation (FAR) incorporated the requirements through a final FAR case 2014-015 which published on September 30, 2016, at 81 FR 67763. The GSAM changes in this order address the GAO's recommendation and update the GSAM guidance to align with the SBA and FAR regulation.

Additionally, the FY16 NDAA, specifically section 863(b), added statutory requirements for providing notification to the public and to post justifications for consolidated procurements and procurements involving substantial bundling. The GSAM changes in this order include guidance for the requirements of the FY16 NDAA.

3. **Effective date.** This change is effective on September 30, 2016.
4. **Explanation of changes.**

The GSAM was amended to align policy and guidance with the SBA and FAR regulations. Additional updates and clarifications were included to the subparts impacted by the consolidation and bundling revisions. For full text changes for the GSAM see Attachment A, GSAM Text Line-In/Line-Out. Additionally, GSA Form 2689, Small Business Analysis Record, (Attachment B) was updated to conform to the following summarized GSAM changes:

- 507.104(a)(5) – Updated the FAR reference for Small Business Technical Advisor (SBTA) coordination, and added a GSAM reference for guidance on coordinating with the SBTA.
- 507.105(a)(2) – Updated the FAR 7.107 reference to read “consolidation, bundling, or substantial bundling” to align with the FAR.
- 507.105(c)(1) – Updated the approving official thresholds by replacing \$5.5 million with \$6 million. This change is consistent with the threshold increase to FAR 7.104(d)(2)(i)(B) (75 FR 53132, August 30, 2010). Additionally, the Head of the Contracting Activity (HCA) approval was updated to acquisitions over \$20 million since the delegation of procurement authority does not necessarily flow through regional commissioners as the current table implies; see Senior Procurement Executive (SPE) memorandums [SPE-2014-05-01](#) and [SPE-2014-05-23](#).
- 507.105(c)(2) - Updated subdivision (v) to require HCA approval for acquisition plans on consolidation requirements above \$2 million and bundling requirements at any dollar value.
- 507.107 - Added this section to align with SBA and FAR regulation and provide additional requirements for acquisitions involving consolidation, bundling or substantial bundling.
- 507.107-1 - This subsection clarifies (1) the applicability of the requirements, (2) the thresholds for consolidation and bundling written determinations, (3) the required approvals for determinations and (4) the required contents of determinations for consolidation, bundling or substantial bundling. It also adds the requirement to report realized substantial benefits throughout the acquisition life cycle to the SPE.
- 507.107-5 - This subsection provides guidance on notifications for consolidated, bundled or substantially bundled requirements.
- 508.404 - Added this section to clarify that Part 519 is applicable to orders and Blanket Purchase Agreements (BPA) against Federal Supply Schedule contracts (e.g. GSA Form 2689, Small Business Analysis Record).
- 519.001 - Updated the definition of “Office of Small Business Utilization staff” with the removal of the term “Small Business Utilization Centers.”
- 519.201 - Minor edits with no substantive change (e.g. adding a space between “AA” and “OSBU”) and added instruction for contracting officers to work with designated SBTAs.
- 519.202-1 - This subsection has been revised. All consolidation and bundling guidance has been removed and incorporated into section 507.107 which aligns with the FAR. Additionally, all requirements for submitting a GSA Form 2689, Small Business Analysis

Record, have been moved to 519.502-70. The remaining text was updated to clearly identify when the designated SBTA receives a copy of the acquisition plan, state the responsibilities of the SBTA and provide a reminder to give consideration to small businesses for orders and BPAs against multiple-award contracts.

- 519.202-2 - Revised the text pertaining to available resources for the identification of small business sources and clarified the contracting officer's responsibility to coordinate communications to the SBA Procurement Center Representative (PCR) with the SBTA.
- 519.502-70 - Clarified the requirements for submitting the GSA Form 2689, Small Business Analysis Record by reorganizing the subdivision topics. The tables were simplified to more clearly identify whether the GSA Form 2689 is required and who is required to provide concurrence. The submission of a GSA Form 2689 is now required for consolidated acquisitions. Following is an explanation for each of the subdivisions:
 - Subdivision (a) provides general information about the GSA Form 2689 including what the form is, optional uses for the form, what supporting information to provide with the form and how to record justification and rationale for an acquisition strategy within the form.
 - Subdivision (b) requires the GSA Form 2689 for acquisitions where consolidation, bundling or substantial bundling is contemplated.
 - Subdivision (c) clarifies the requirement for when a GSA Form 2689 is required for Orders and BPAs, including BPA call orders, against Multiple-award contracts (see 2.101).
 - Subdivision (d) clarifies the GSA Form 2689 is not required for acquisitions at or below the SAT, unless the acquisition is consolidation, bundling or substantial bundling, and may be used to document market research.
 - Subdivision (e) clarifies when a GSA Form 2689 is required for acquisitions above the SAT.
 - Subdivision (f) identifies exceptions to providing the GSA Form 2689.
 - Subdivision (g) updates and simplifies the table, GSA Form 2689 Required Conditions, (i.e. placed conditions in descending order to reduce (1) confusion and (2) need to review all conditions) to assist the contracting officer with determining whether or not executing a GSA Form 2689 is necessary.
 - Subdivision (h) revises the table, GSA Form 2689 Concurrence and Timeframe, to identify who needs to provide concurrence and to provide the review timeframes based on acquisition thresholds. This table is meant to be used after the contracting officer has determined a GSA Form 2689 is required. Exceptions to the concurrence requirements are identified. Additionally the subdivision adds responsibilities of the SBTA, recourse for the contracting officer when a response is not received and clarifies review timeframes when a "Non-Concur" is received.
 - Subdivisions (i) and (j) have no substantive changes.

5. Cancellations and Rescissions: None



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**GSAM Case 2016-G504
Consolidation and Bundling of Contract Requirements
Tab A - GSAM Text, Line-In/Line-Out**

GSAM Baseline: Change 73 effective 7/6/2016

- Additions to baseline are indicated by **[bold text in brackets]**
- Deletions to baseline are indicated by ~~strikethroughs~~
- Five asterisks (*****) indicate that there are no revisions between the preceding and following sections
- Three asterisks (***) indicate that there are no revisions between the material shown within a subsection

Part 507 - Acquisition Planning

Subpart 507.1 - Acquisition Plans

* * * * *

507.104 General procedures.

(a) * * *

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(5) Coordinate with the Small Business Technical Advisor (SBTA) as necessary to fulfill the requirements of FAR 7.104(d)~~(4)~~. **[(See 519.202-1)]**

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507.105 Contents of acquisition plans.

(a) * * *

* * * * *

(2) FAR 7.106 (major systems) and FAR 7.107 (**[consolidation,] bundling[, or substantial bundling]**) shall be addressed in the plans, if applicable.

* * * * *

(c) Approval Thresholds.

(1) The following are the dollar value thresholds and the level of the approving official for approving acquisition plans or waiving written plans. For purposes of leasing, the Simplified Leasing Acquisition Threshold (SLAT) is defined in Part 570. The HCA may authorize higher level approving officials for the thresholds set out below.

Threshold	Approving Official

Below the SAT (SLAT for leases)	Contracting Officer
SAT (SLAT for leases) to, and including, \$5-5[6] million	One Level above the Contracting Officer
Over \$5-5[6] million to, and including, \$20 million	Contracting Director
Over \$20 million to, and including, \$50 million	Regional Commissioner or Deputy Regional Commissioner [HCA]
Over \$50 million	HCA

Note: Thresholds shall include all options.

(2) If the acquisition meets one of the following criteria and is greater than the SAT, the planner must obtain HCA approval of the plan:

(i) Complex, critical to agency strategic objectives and mission, highly visible or politically sensitive.

(ii) An acquisition with which GSA has little or no experience that may result in a need for greater oversight or risk management.

(iii) Actions using significantly changed methods (e.g., methods of procurement such as lease versus purchase, or methods of performance such as contractor versus Government personnel).

(iv) New construction or repair, lease prospectus and alteration prospectus budget line items.

(v) Any acquisition that requires [involves —

(A) Consolidation above \$2 million (FAR 7.107-2); or]contract bundling(FAR 7.107)

[(B) Bundling at any dollar value (FAR 7.107-3)].

[507.107 Additional requirements for acquisitions involving consolidation, bundling or substantial bundling.

507.107-1 General.

(a) *Applicability.* The contracting officer must determine if the requirement is considered consolidation, bundling or substantial bundling per the definitions in

FAR 2.101(b) and 7.107-4. Additional guidance on the definitions is available on the GSA Acquisition Portal (<http://insite.gsa.gov/consolidation-bundling>).

(b) *Thresholds for Written Determination.* Notwithstanding exceptions per FAR 7.107-1(b), a written determination is required for-

- (1) Consolidation requirements above \$2 million; and**
- (2) Bundling requirements at any dollar value.**

(c) *Approvals for Written Determination.*

(1) The contracting officer shall obtain approvals as required by the Service prior to the Associate Administrator, Office of Small Business Utilization (AA OSBU) and the Senior Procurement Executive (SPE).

(2) The contracting officer shall coordinate with the GSA Office of Small Business Utilization (OSBU) for AA OSBU's approval prior to the SPE's approval.

(3) Review and approval guidance can be found on the GSA Acquisition Portal (<http://insite.gsa.gov/consolidation-bundling/approvals>).

(d) *Contents of Written Determination for Consolidation.*

(1) The contracting officer must provide the following information, which includes the requirements at FAR 7.107-2:

- (i) Brief description of the acquisition history.**
- (ii) Description of the market research conducted.**
- (iii) Identification of any alternative contracting approaches that involve a lesser degree of consolidation of contract requirements.**
- (iv) Identification of the contracting approach selected.**
- (v) Identification of any negative impacts to small business concerns.**
- (vi) Description of steps taken to include small business concerns in the acquisition strategy.**
- (vii) Explanation of the substantial benefits.**
- (viii) Statement that the consolidation and/or bundling is necessary and justified.**

(2) Additional consolidation and bundling guidance is available on the GSA Acquisition Portal (<http://insite.gsa.gov/consolidation-bundling>).

(e) *Additional Contents of Written Determination for Bundling.*

- (1) The contracting officer must provide the information required by paragraph (e)(2) of this subsection in addition to paragraph (d) of this subsection when the requirement is considered bundling (see FAR 2.101). The additional information listed in this paragraph includes the requirements at FAR 7.107-3.**
- (2) The contracting officer must use market research to determine prices the Government could have been or could be charged by a small business for the work previously performed by other than small business(es) (see FAR 7.107-3(g)).**

(f) Additional Contents of Written Determination for Substantial Bundling.

- (1) The contracting officer must provide the information required by paragraph (f)(2) of this subsection in addition to paragraphs (d) and (e) of this subsection when the requirement is considered substantial bundling (see FAR 7.107-4).**
- (2) The contracting officer must provide the following information, which includes the requirements at FAR 7.107-4(b):**
 - (i) Explain the rationale for not selecting each alternative contracting approach with a lesser degree of consolidation.**
 - (ii) Identify the specific impediments to participation by small business concerns as contractors, including any relevant socioeconomic subcategories.**
 - (iii) Explain any actions designed to maximize small business participation through teaming.**
 - (iv) Explain any actions designed to maximize small business participation through subcontracting, including suppliers.**

(g) Substantial Benefits Reporting.

- (1) The contracting officer must monitor and measure actual savings throughout the acquisition life cycle, and report realized substantial benefits to the SPE.**
- (2) Realized substantial benefits shall be reported:**
 - (i) Within 14 calendar days after award of the contract.**
 - (ii) Within 30 calendar days after completion of the contract.**

(iii) During contract performance as requested by the SPE on a case by case basis.

(3) Reporting guidance is available on the GSA Acquisition Portal (<http://insite.gsa.gov/consolidation-bundling>).

507.107-5 Notifications.

(a) Notification to public of rationale for consolidated, bundled or substantially bundled requirement.

(1) A summary notification of a determination that a consolidated, bundled or substantially bundled requirement is necessary and justified will be published by the SPE on the GSA public website at <http://www.gsa.gov/consolidation-bundling>. The notice will be posted within 7 days of the SPE approved determination.

(2) Any solicitation related to the consolidation, bundled or substantially bundled requirement can only be published after the summary notice from subparagraph (a)(1) of this section has been published for at least 7 days.

(3) The contracting officer is encouraged to provide the summary notification from subparagraph (a)(1) of this section to the Governmentwide Point of Entry (GPE) before issuance of the solicitation.

(4) The contracting officer shall publish the SPE approved determination with the publication of the solicitation, redacted as necessary.

(5) For bundled or substantially bundled requirements, in addition to the requirements of this subsection, the contracting officer must verify compliance with the notification requirements of FAR 7.107-5(b).

(b) Notification to SBA of follow-on consolidated or bundled requirements.

(1) The contracting officer shall coordinate with the designated SBTA (see 519.4) to provide follow-on notification to the SBA PCR in accordance with FAR 7.107-5(c). The designated SBTA will provide notification to the AA OSBU.

(2) The SBTA will submit the notification to SBA PCR within 5 business days of receiving the notification from the contracting officer or request an extension from the contracting officer.]

Part 508 - Required Sources of Supplies and Services

[Subpart 508.4 - Federal Supply Schedules

508.404 Use of Federal Supply Schedules.

- (a) **General.** Although FAR Part 19 (except for the requirement at 19.202-1(e)(1)(iii)) does not apply to BPAs or orders placed against Federal Supply Schedule (FSS) contracts, they are not exempt from Part 519.]

Part 519 - Small Business Programs

519.001 Definitions.

“Office of Small Business Utilization staff” as used in this subpart, means the staff with responsibility for supporting small business activities. In ~~[GSA]Central Office~~, this is the Office of Small Business Utilization, (OSBU) **[with personnel in central office and each region]** and the Small Business Technical Advisors (SBTAs). ~~In the Regions, this staff is a separate office (e.g., Small Business Utilization Centers (SBUCs)).~~

Subpart 519.2- Policies

519.201 General policy.

(a) The Associate Administrator, Office of Small Business Utilization (AA ~~]OSBU~~) is the Director of Small and Disadvantaged Business Utilization in GSA.

(b) The **[AA OSBU delegates duties to]** ~~Office of Small Business Utilization, (OSBU)~~ appoints Small Business Technical Advisors (SBTAs) **[for each region through written appointment]** ~~, in writing.~~ Each ~~Central Office Service and each Region~~ has at least one SBTA. All references to SBTA in this part refer to the SBTA designated to support his/her service or region, whichever is applicable.

[(c) Contracting officers shall work with the designated SBTA for their region or service.]

519.202 Specific policies.

519.202-1 Encouraging small business participation in acquisitions.

[When applicable, the following procedures shall be used to promote small business through acquisition.

(a) For any acquisition that requires a GSA Form 2689 per GSAM 519.502-70, an acquisition plan shall be submitted to the SBTA. The acquisition plan shall be submitted to the SBTA for approval after the 2689 has been approved.

(b) The designated SBTA will provide the copy of the proposed acquisition package to the SBA PCR in accordance with FAR 19.202-1(e) and GSAM 519.4.

(c) When placing orders or establishing BPAs against multiple-award contracts (see FAR 2.101), small businesses should be given consideration prior to large businesses.]

~~(a) The acquisition planner is required to obtain signature of the SBTA or Small Business Specialist (SBS) assigned to the specific region, service or central office staff office on any acquisition plans that:~~

~~(1) Requires submission of a GSA Form 2689, Small Business Analysis Record, under GSAM [519.502-70](#);~~

~~(2) Involves contract bundling (see FAR 19.202-1(e) and paragraph (b)(2) of this section);~~
or

~~(3) Is at or above the dollar threshold identified in FAR 7.104(d)(2).~~

~~(b) Bundled acquisitions:~~

~~(1) If the planner and contracting officer have failed to recognize that the acquisition is bundled, the SBTA or SBS shall notify the AAOSBU.~~

~~(2) When bundling is contemplated (see FAR 7.107), coordination with the SBTA and the AAOSBU is required:~~

~~(i) Use the GSA Form 2689 to obtain signature of the SBTA and the Small Business Administration (SBA) Procurement Center Representative (PCR). The SBTA will coordinate with the AAOSBU (see FAR 19.202-1(e)).~~

~~(ii) When substantial bundling is contemplated the acquisition planner shall use the GSA Form 2689 to also coordinate with the AAOSBU (see FAR 7.107(e) and 19.202-1(e)).~~

~~(c) Consolidated acquisitions:~~

~~(1) All consolidated acquisitions require review and approval from the Head of Contracting Activity (HCA), SBTA, and then Senior Procurement Executive. The SBTA will coordinate for review by the SBA PCR as necessary, and required concurrence of the AAOSBU.~~

~~(2) Consolidated acquisitions require special attention. The contracting officer shall consult with the appropriate Office of Acquisition Management.~~

~~(3) For all consolidated acquisitions, GSA shall conduct market research; identify potential alternative contracting approaches that involve lesser degrees of consolidation; issue a written determination in support of the consolidation; identify negative impacts on small businesses; and ensure that steps will be taken to include small business concerns in the acquisition strategy.~~

519.202-2 Locating small business sources.

(a) ~~[Queries using the “Dynamic Small Business Search,” at <http://dsbs.sba.gov> are encouraged to locate small business sources.~~

~~(b) The designated SBTA may be contacted for assistance with identifying small business sources.~~

~~(c) The contracting officer must coordinate communications through the SBTA (see 519.4) when contacting the SBA Procurement Center Representative (PCR) in accordance with FAR 19.202-1.]~~

~~The contracting officer shall confer with the appropriate SBTA when he or she needs help to identify additional small business, veteran-owned small business, service-disabled veteran-owned small business, Historically Underutilized Business Zone (HUBZone) small business, small disadvantaged business, and women-owned small business concern sources to solicit for a requirement. The SBTA will coordinate with the SBA PCR.~~

~~(b) The SBTA should query “Dynamic Small Business Search,” at <http://dsbs.sba.gov>.~~

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Subpart 519.5 - Set-asides for Small Business

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519.502-70 Review of non-set-aside determinations.

(a) **[General.]** GSA Form 2689, Small Business Analysis Record.

[(1)] The GSA Form 2689 is used to[—

(i) **R]ecord evidence that consideration has been given to small business, service-disabled veteran-owned small business, HUBZone small business, small disadvantaged business, or women-owned small business[**, or **8(a) Business Development Program participants]**; and, ~~for instances of contract bundling (including substantial bundling).~~

[(ii) Document that small businesses received maximum practicable opportunity to participate in a proposed acquisition.]

(b[2]) The GSA Form 2689 may be used in place of a “Memo to File” when documenting the requirement for market research and as a tool to assure maximum practicable small business opportunity.

~~(c) The GSA Form 2689 is not required for acquisitions with mandatory sources such as Federal Prison Industries, Inc. and AbilityOne.~~

[(3) The contracting officer shall include all pertinent documents with the GSA Form 2689 to support the proposed acquisition strategy (i.e., Dynamic Small Business Search results, responses to Federal Business Opportunity sources sought notice, performance work statement, statement of work, sole source justification, consolidation or bundling determination, business case, etc.).

(4) The contracting officer shall record the justification and rationale for the determined acquisition strategy on the GSA Form 2689.

(b) Consolidated or Bundled Acquisitions. The GSA Form 2689 is required for acquisitions when consolidation, bundling or substantial bundling (FAR 2.101 and 7.107-4) is contemplated regardless of estimated total contract value.

(c) Orders.

(1) The GSA Form 2689 is required for orders and Blanket Purchase Agreements (BPAs), including BPA orders, against Multiple-award Contracts (see FAR 2.101) and expected to equal or exceed \$6 million (see FAR 7.104(d)) , unless the contract, order or BPA is set aside for one of the small business programs specified in FAR 19.203 (e.g. 8(a), HUBZone, WOSB, or SDVOSB).

(2) Orders or BPAs against Multiple-award Contracts (see FAR 2.101) that are less than \$6 million do not require a GSA Form 2689, unless the acquisition is consolidation, bundling or substantial bundling.]

~~**Acquisition at or below the Simplified Acquisition Threshold**~~

~~**(d) [Acquisitions at or below the Simplified Acquisition Threshold (SAT).**~~

~~**(1) The GSA Form 2689 is not required for acquisitions at or below the SAT, unless the acquisition is consolidation, bundling or substantial bundling. However, it may be used to document market research. Contracting officers are encouraged to use the GSA Form 2689 to document any determination to not use small business under the SAT in accordance with FAR 19.502-2(a).]**~~ The GSA Form 2689 may also be used in place of a

~~“Memo to File” for unrestricted acquisitions with a dollar value expected to exceed the micro-purchase threshold, but not over the simplified acquisition threshold (SAT), if a determination is made that there is not a reasonable expectation of obtaining offers from two or more responsible small business concerns that have competitive market price, quality, and delivery.~~

[(2)] The GSA Form 2689 does not require SBTA or SBA PCR review or signature **[when documenting market research.]** for these acquisitions:

~~(e) The GSA Form 2689 is not required for acquisitions at or below the Simplified Acquisition Threshold.~~

~~Acquisition expected to exceed the Simplified Acquisition Threshold~~

[(e)f] [Acquisitions expected to exceed the Simplified Acquisition Threshold (SAT).]

The GSA Form 2689 is required for acquisitions expected to exceed the Simplified Acquisition Threshold (SAT) when **[—]**:

(1) A determination is made to **[set aside] set-aside** for small business but not one of the small business programs specified in FAR 19.203 (8(a), HUBZone, WOSB, or SDVOSB); **[or]** (SBA PCR may review; however, signature is not required);

(2) A determination is made to utilize full and open competition **[.]**; or

~~(3) Contract Bundling is contemplated (see FAR 2.101).~~

~~(g) The GSA Form 2689 is required for orders against Multiple Award Schedule contracts (see FAR 38.101(e)), orders placed under Indefinite Delivery Contracts (see FAR 16.5), or Blanket Purchase Agreements under Multiple Award Schedule contracts (see FAR 8.404) when:~~

~~(1) The acquisition is expected to equal or exceed the dollar threshold identified in FAR 7.104(d)(2) and is not set-aside for small business; or~~

~~(2) Contract Bundling is contemplated (see FAR 2.101).~~

~~(h) Include all pertinent documents with the GSA Form 2689 to support the proposed acquisition strategy (i.e., Dynamic Small Business Search results, responses to a sources sought Federal Business Opportunity notice, PWS, SOW, J&A etc).~~

~~(i) Contracting officer shall record his or her decision on GSA Form 2689. Submit the form to the SBTA for review.~~

[(f) Exceptions. The GSA Form 2689 is not required for—

(1) Acquisitions with mandatory sources (see FAR 8.002 and 8.003);

(2) Acquisitions, including contracts, orders, and BPAs, that have been set aside for a small business program specified in FAR 19.203 (e.g. 8(a), HUBZone, WOSB, or SDVOSB) unless consolidated, bundled or substantially bundled; or

(3) Orders or BPAs under \$6 million, unless consolidated, bundled or substantially bundled (see paragraphs (b) and (c) of this subsection).]

(j[g]) *[GSA Form 2689 Requirement Conditions.*

(1) **General.]** The following [table] ~~chart~~ is a reference to determine when the GSA Form 2689 is required for completion and submission.

(2) **[Instructions. The table has an order of precedence.**

(i) Review the “Contract Vehicle Conditions” column in numerical order.

(ii) Once a condition applies to the acquisition, the applicability of the form will be identified in the “GSA Form 2689 Required?” column.

(iii) Once a condition applies to the acquisition, further conditions down the table do not apply.]

Note: Replace existing table with new table. Do not print this text.

Contract Vehicle Conditions	GSA Form 2689 Required?	Rationale
(1) Any acquisition from mandatory sources	Not Required	GSAM 519.502-70(f)(1) Mandatory Sources - FAR 8.002(a)(1)(iv) (Supplies) - FAR 8.002(a)(2)(i) (Services) - FAR 8.003
(2) Acquisitions, including contracts or orders, that meet the definition of consolidation, bundling or substantial bundling (FAR 2.101 and 7.107-4).	Required at any estimated total contract value	GSAM 519.502-70(b)
(3) Acquisitions, including contracts, orders and BPAs, that have been set aside for a small business program as specified in FAR 19.203 (e.g. 8(a), HUBZone, WOSB, or SDVOSB)	Not Required	GSAM 519.502-70(f)(2)

<p>(4) Orders and BPAs, including BPA call orders, against Multiple-Award contracts (see FAR 2.101)</p>	<p>Required if valued at \$6M or more, unless set-aside for small business programs as specified in FAR 19.203 (e.g. 8(a), HUBZone, WOSB, or SDVOSB)</p> <p>Not Required if under \$6M</p>	<p>GSAM 519.502-70(c)</p> <p>Set-aside is discretionary</p> <ul style="list-style-type: none"> - FAR 8.405-5(a) - FAR 16.505(b)(2)(i)(F)
<p>(5) Contracts under the SAT</p>	<p>Not Required but encouraged to use the form as a market research tool</p>	<p>GSAM 519.502-70(d)</p>
<p>(6) Contracts over the SAT and set-aside for 8(a), HUBZone, WOSB, or SDVOSB</p>	<p>Not Required</p>	<p>GSAM 519.502-70(e)(1) FAR 19.203(a)</p>
<p>(7) Contracts over the SAT and set aside for small business, but NOT set-aside for 8(a), HUBZone, WOSB, or SDVOSB</p>	<p>Required</p>	<p>GSAM 519.502-70(e)(1) FAR 19.203(c)</p>
<p>(8) Contracts over the SAT and not set-aside (i.e. full and open competition)</p>	<p>Required</p>	<p>GSAM 519.502-70(e)(2)</p>

<p>Threshold/Contract Vehicle</p>	<p>GSA Form 2689 and Submission to the SBT/SBA</p>		<p>Rationale</p>
<p>(1) Under the simplified acquisition threshold (SAT)</p>		<p>Not Required</p>	<p>GSAM 519.502-70(d)</p> <p>The GSA Form 2689 may be used in place of a "Memo to File" for unrestricted acquisitions to exceed the micro-purchase threshold, but not over SAT. The GSA Form 2689 does not require SBT/SBA PCR review or signature for these acquisitions.</p>
<p>(2) Acquisitions from mandatory sources such as AbilityOne</p>		<p>Not Required</p>	<p>FAR 8.002(a)(1)(iv) (Supplies) and FAR 8.002(a)(2)(i) (Services)</p> <p>FAR 19 set-aside procedures are not applicable.</p>
<p>(3) Order/BPA against Multiple-Award Schedule</p>	<p>Required When Applicable (see 8 and 9 of this chart)</p>		<p>GSAM 519.502-70(g)</p> <p>FAR 8.405-5(a)(1)(i) and FAR 8.405-5(a)(1)(ii)</p> <p>Set-aside is discretionary</p>

(4) Order against Indefinite-Delivery Contract	Required When Applicable (see 8 and 9 of this chart)		FAR 16.505(b)(2)(i)(F) Set aside is discretionary
(5) Over SAT and set aside for 8(a), HUBZone, WOSB, or SDVOSB		Not Required	GSAM 519.502-70(f) and FAR 19.203(a) The GSA Form 2689 not required when an acquisition is set aside for 8(a), HUBZone, WOSB, or SDVOSB. There is no order of precedence among these programs.
(6) Over SAT and set aside for small business, but NOT set aside for 8(a), HUBZone, WOSB, or SDVOSB	Required (SBA PCR may review; however, signature is not required)		FAR 19.501(e) and FAR 19.203(e) For acquisitions above the simplified acquisition threshold, the contracting officer shall first consider an acquisition for the small business socioeconomic contracting programs before considering a small business set aside.
(7) Over SAT and not set aside (full and open competition)	Required		GSAM 519.502-70(f) If not to set aside for small business, socioeconomic programs; or if contract bundling is contemplated.
(8) Acquisition meets established threshold for coordination with the SBS/SBTA and is not set aside.	Required		GSAM 519.202-1 and FAR 7.104 Coordinate with SBTA and SBA for acquisitions expected to equal or exceed the established dollar threshold referenced in FAR 7.104(d)(2).
(9) When contract bundling is contemplated.	Required		GSAM 519.202-1 and FAR 19.202-1

(k[h]) [GSA Form 2689 Concurrence and Timeframes.] ~~Reviews and timeframes.~~

[(1) Use the guidance in paragraphs (c) through (g) to determine if a GSA Form 2689 is required. If a GSA Form 2689 is required, then follow the dollar value thresholds in the table below to determine the level of concurrence for the form.

*****Note: Replace existing table with new table. Do not print this text.*****

Thresholds	SBTA Concurrence	SBA PCR Concurrence	AA OSBU Concurrence	Review Timeframe
Less than SAT	Not Required, unless an exception in	Not Required, unless an exception in	Not Required, unless an exception in	Not Applicable

	519.502-70(h)(2) applies	519.502-70(h)(2) applies	519.502-70(h)(2) applies	
Equal to or greater than SAT and less than \$50M	Required	Required	Not Required, unless an exception in 519.502-70(h)(2) applies	Within 5 business days following the day of receipt
Equal to or greater than \$50M	Required	Required	Required	Within 10 business days following the day of receipt (i.e. 5 business days total for the SBTA and SBA PCR and 5 business days for AA OSBU)

If...	Then...
<p>(1) The acquisition meets any one of the following conditions:</p> <ul style="list-style-type: none"> (i) It will be a Multiple Award Schedule solicitation (see FAR 38.1) or an Indefinite Delivery solicitation (see FAR 16.5); (ii) The estimated value does not exceed \$50 million, including options; (iii) The contract will cover only one region or designated locations in one region (at any dollar value); 	<p>The SBTA provides a copy of the GSA Form 2689 to the SBA representative for review. The SBTA and the SBA representative must complete their review within 5 workdays after the SBTA receives the Form, or request an extension from the contracting officer.</p>
<p>(2) The acquisition, excluding Multiple Award Schedule contracts, meets one of the following conditions:</p> <ul style="list-style-type: none"> (i) The estimated value exceeds \$50 million (including options) and contract performance will occur in two or more regions; (ii) Based on political sensitivity or importance to GSA, the Associate Administrator for the Office of Small Business 	<p>The SBTA provides a copy of the GSA Form 2689 to the AAOSBU for review and comment on the decision. After the AAOSBU review, the SBTA submits the GSA Form 2689 to the SBA representative for review. All reviews and comments must be completed within 10 workdays after the SBTA receives the Form, or the SBTA must request a time extension from the contracting officer.</p>

<p>Utilization designates the acquisition for review: (iii) The acquisition meets the definition of a Bundled Contract FAR 7.107 and FAR 2.101.</p>	
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[(2) If the acquisition meets one of the following criteria, the contracting officer must obtain all concurrences of the GSA Form 2689 regardless of the concurrence threshold:

(i) Complex, critical to agency strategic objectives and mission, highly visible or politically sensitive.

(ii) Acquisitions that will be performed in more than one region.

(3) The SBTA is responsible to follow-up with the SBA PCR and inform the contracting officer.

(4) The SBTA must request from the contracting officer an extension if concurrence will not be met by the established timeframe as defined above in the table.

(5) If a response is not received from the SBA PCR, the SBTA must elevate within OSBU for resolution at osbu_review_concurrence@gsa.gov.

(6) If the contracting officer does not receive a response from the SBTA within the established timeframes and the SBTA has been unresponsive to the contracting officer's inquiries, the contracting officer should elevate within OSBU for resolution at osbu_review_concurrence@gsa.gov.

(7) If a "Non-Concur" is received on the GSA Form 2689, the contracting officer is required to re-submit for concurrence. The timeframe for review is reset when the form is re-submitted.]

(f[i]) [Disagreements.] If a reviewing official disagrees with the contracting officer's decision not to ~~[set aside]~~ set-aside an acquisition, the SBTA must provide the contracting officer the rationale for the disagreement or provide the contracting officer with additional small business sources that are interested in and capable of fulfilling the requirement. Review and consider any information provided by the SBTA before making a decision.

(m[j]) [Resolving disagreements]. The HCA ~~[(see GSAM 502.101)]~~, as-delegated, in the applicable Central Office and/or Regional Service resolves disagreements between the contracting officer and the SBTA. To resolve disagreements with the SBA ~~[PCR]~~ representative, see FAR 19.505.

* * * * *

SMALL BUSINESS ANALYSIS RECORD

Contracting Officer's preferred procurement method

Items 1-9, New Acquisition Details - To be completed by the Contracting Officer

1a. Contracting Officer (Last, First, Middle Initial)	1b. Office Symbol	1c. E-Mail/Telephone Number
2. Office/Organization	3. Project/Requisitioner Name (if applicable)	4. Project(s)/Requisition(s) Number
5. Description of Product(s) or Service(s), including place of performance		
6a. Federal Supply Class/Product Service Code	6b. NAICS Code	7. GSA Funded? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial
8a. Estimated Dollar Value Base Period		
8b. Total Estimated Dollar Value Including Options		
8c. Estimated Dollar Value Set-Aside		
8d. Estimated Dollar Value Not Set-Aside		
9. Period of Performance/Delivery Date Base Period for the contract From _____ To _____ Option Periods _____ From _____ To _____		

Item 10 to be completed by the Contracting Officer. Item 11 to be completed by the Supervisory Official. Item 12 to be completed by the SBTA. Item 13 to be completed by the SBA PCR. Item 14 to be completed by the AA OSBU, as applicable.

10a. Name of Contracting Officer	11a. Name of Supervisory Official
10b. Signature of Contracting Officer and Date	11b. Concurrence by Supervisory Official and Date
12a. Small Business Technical Advisor (SBTA) (Check One) <input type="checkbox"/> Concur <input type="checkbox"/> Non-concur <input type="checkbox"/> Additional Sources	12b. SBTA Reviewer Name
	12c. SBTA Signature
	12d. Date
12e. SBTA's rationale/additional sources provided for the Contracting Officer's consideration	
13a. Small Business Administration (SBA) Procurement Center Representative (PCR) (Check One) <input type="checkbox"/> Concur <input type="checkbox"/> Non-concur <input type="checkbox"/> Additional Sources	13b. SBA PCR Reviewer Name
	13c. SBA PCR Signature
	13d. Date
13e. SBA PCR's rationale/additional sources provided for the Contracting Officer's consideration	
14a. Associate Administrator of the Office of Small Business Utilization (AA OSBU) (Check One) <input type="checkbox"/> Concur <input type="checkbox"/> Non-concur	14b. AA OSBU Reviewer Name
	14c. AA OSBU Signature
	14d. Date
14e. AA OSBU's rationale provided for the Contracting Officer	

Items 15 - 17, Acquisition History - To be completed by the Contracting Officer

15. First Time Buy YES NO *** If YES, skip to 18.

16. Were there multiple previous acquisitions? YES - Attach separate supporting documentation for 17a-i.
(Include up to the 3 most recent award histories.)
 NO - Complete 17a-i on the form.

17a. NAICS Code	17b. Small Business Size Standard (visit www.sba.gov for size standard)
	Number of Employees
	Average Annual Receipts

17c. Previous Contract/Delivery or Task Order Number	17d. Award Date	17e. Total Award Amount
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17f. Contractor Name & Address

17g. Contractor Size/Preference Status at Award

17h. Total Number of Offerors (if known) _____ and Business Size Status (check below)

Other Than Small _____ SB _____ HUBZone _____ SDB _____ 8(a) _____ WOSB _____ EDWOSB _____ SDVOSB _____

17i. Comments

Items 18-27, Proposed Acquisition Method, Justifications and Considerations - To be completed by the Contracting Officer

18a. Is this procurement a sole source or limited source acquisition? (FAR 6.3, 8.4, 16.5) YES NO

Note: If "Yes", attach the approved sole-source or limited source justification, complete item 18b, and submit the form without proceeding further. If "No", proceed to item 19.

18b. Sole source or limited source business information: Other than SB SB 8(a) HUBZone SDVOSB WOSB EDWOSB
(check all that apply)

19. Will this procurement be solicited off of a pre-existing contract vehicle? YES NO

If "Yes," identify the contract name or number: _____

Note: GSA employees are required to use existing acquisition vehicles (unless an exception is applicable) before establishing new contracts for similar products or services (Acquisition Alert 2014-07 and GSA memo dated October 11, 2012).

20. Acquisition Authority: FAR Part _____ 21. Is a synopsis required? YES NO
(FAR 8.4, 13, 14, 15, or 16.5) (Exceptions see FAR Subpart 5.202)

22. Multiple Item Acquisition (product/supplies only) YES NO

Note: If "Yes," complete items 23a-c for each acquisition item as a separate attachment. If "No," complete item 23 on this form.

23. **Prioritized Small Business Consideration:** (reference FAR 19.203)

a. First, will this procurement be considered for a socioeconomic program set-aside? YES NO

If "Yes," identify the type of set-aside: 8(a) HUBZone SDVOSB WOSB EDWOSB

If your procurement is consolidation and you set aside for a socioeconomic program, the GSA 2689 is required and skip to item 27. If your procurement is not consolidation and you set aside for a socioeconomic program, this form is not required but may be used as a memo to the file to document market research.

b. Second, if "No" to 23a, then will this procurement be considered for a small business set aside? YES NO

If "Yes," identify the type of set-aside: Total SB set-aside Partial SB set-aside

c. Third, if "No" to 23b, then the procurement will not be set aside. Correct Incorrect

24. After consideration of the following source selection factors, will any be used in the source selection evaluation plan?

If "No," explain why in the supporting documentation.

a. Socioeconomic Status (See 15 USC 644(g)) YES NO

b. Subcontracting Plan (See GSAM 519.7 for reference) YES NO

c. Mentor Protégé YES NO

d. Small Business Teaming Arrangements or Joint Ventures (See FAR 7.107-6) YES NO

25. Market Research Conducted to Support Selected Method

Attach additional documentation supporting determination in accordance with GSAM 519.502-70, FAR 7.105, and FAR 10.001.

26. Justifications for non-set-aside determination (check all that apply)

No reasonable expectation that offers will be received from at least two responsible 8(a), HUBZone, SDVOSB, WOSB, or EDWOSB that are competitive in terms of fair market prices, quality, and delivery.

No reasonable expectation that offers will be received from two or more responsible small business concerns that are competitive in terms of fair market prices, quality, and delivery.

No reasonable expectation that offers will be received from at least two 8(a), HUBZone, SDVOSB, WOSB, or EDWOSB offering on the product of different small business manufacturers (See FAR 19.102(f) and 19.502).

No reasonable expectation that offers will be received from at least two small business concerns offering on the product of different small business manufacturers (See FAR 19.102(f) and 19.502).

Item on a Qualified Products List (QPL)/Qualified Products Database (QPD) and large businesses are interested in offering (See FAR 19.502-6).

Other (Attach supporting documentation)

27. Contract Consolidation, Bundling, or Substantial Bundling Review

YES NO Does the procurement meet the definition of a consolidated, bundled, or substantially bundled contract? (See FAR 2.101 and 7.107-4) ***If "Yes," attach the approved determination. (See GSAM 507.107-1) If "No," then the form is complete.

YES NO For consolidated, bundled, or substantially bundled contracts, is this form being submitted at least 30 days in advance of your planned solicitation date? (See FAR 19.202-1(e)(1)(iii) and GSAM 519.202-1)

YES NO N/A For bundled or substantially bundled contracts, was the affected small business incumbent notified of the Government's intention to bundle the requirement performed at least 30 days in advance of the solicitation? (See FAR 7.107-5(a))

INSTRUCTIONS FOR GSA 2689, SMALL BUSINESS ANALYSIS RECORD

The General Services Administration Acquisition Manual (GSAM) subsection 519.502-70, *Review of non-set-aside determinations*, prescribes the requirement for when to complete the GSA 2689. Specifically use the table in subsection (h) to help determine whether the form is applicable to the procurement. Execution of the GSA small business program requires coordination and participation from all members of the acquisition team. Therefore, the appropriate acquisition personnel shall complete this form [e.g. Contracting Officer, and the Small Business Technical Advisor (SBTA) and the Small Business Administration Procurement Center Representative (SBA PCR)]. This form is utilized to record evidence that consideration has been given to small business (SB), service-disabled veteran-owned small business (SDVOSB), Historically Underutilized Business Zone (HUBZone) small business, women-owned small business (WOSB), and 8(a) Business Development Program Participants. The form also documents that small businesses received maximum practicable opportunity to participate in a proposed acquisition; including instances of contract consolidation, bundling, and substantial bundling. The form may be used in place of a "Memo to File" when documenting market research if appropriate.

Form Instructions

1. The following instruction prescribes how to complete each item on the GSA 2689 and what additional documentation must be submitted with the form:

Items 1-9: Fill in as required.

Items 10-14: Signatures required before the next level of review.

Items 15-17: Fill in as required.

Item 18: Fill in as required. If sole source or limited source is selected, attach the approved justification required pursuant to FAR 6.302, 8.405-6, or 16.505.

Item 19: Identify if the procurement will be solicited of a pre-existing vehicle. Pre-existing contract vehicles include Multiple Award Schedule (MAS) or MAS Blanket Purchase Agreement (BPA), Multi-Agency Contract (MAC), Government-Wide Acquisition Contract (GWAC), and Multiple Award Indefinite Delivery Indefinite Quantity (IDIQ) Contracts.

Item 20: Enter in the acquisition authority being used for the procurement (i.e. FAR Part 8.4, 13, 14, 15, or 16.5)

Item 21: Identify if a synopsis is required. See FAR 5.2 for exceptions to the synopsis requirement.

Item 22: Multiple item acquisitions, which are not bundling, combine related items under one solicitation and make awards either on an item-by-item basis, or an all-or-none basis, to one or more sources. For multiple item acquisitions, set-aside determinations must be determined on an individual basis if item-by-item award basis and as a whole if under an all-or-none basis. "Items" may be called a National Stock Number (NSN), Contract Line Item Number (CLIN), Special Item Number (SIN), Functional Area (FA), or Pool.

Item 23: After proper market research, indicate if the procurement will be considered for a socioeconomic program set-aside (e.g. 8(a), HUBZone, SDVOSB, WOSB, EDWOSB). If the procurement will not be set aside for a socioeconomic program, indicate if the procurement will be considered for a small business set-aside. A small business set-aside can be a partial set-aside or a full set-aside. If the procurement will not be set aside for small business, then verify by selecting "correct" or "incorrect." Note: if the procurement is a consolidation, the GSA 2689 is required even if the procurement will be set aside for a socioeconomic program.

Item 24: Identify whether consideration was given to the source selection factors listed. Address in your supporting documentation and Acquisition Plan the source selection evaluation factors that will be used and indicate on the form whether consideration was given to Subcontracting Plan and/or Mentor Protégé involvement as an evaluation factor. Also indicate whether socioeconomic status will be considered in order to help achieve/exceed GSA's socioeconomic goals established in accordance with the Small Business Act (15 USC 644(g)).

Item 25: Attach market research conducted to support determination in accordance with GSAM 519.502-70, FAR 7.105, and FAR 10.001 (e.g. Sources sought notice and responses, Dynamic Small Business Search results).

Item 26: Select reason(s) for not setting aside for a socioeconomic program (e.g. 8(a), HUBZone, SDVOSB, WOSB, EDWOSB) or small business (FAR 19.203(c)).

Item 27: Complete Contract Consolidation, Bundling, and Substantial Bundling Review and attach the approved written determination required pursuant to FAR 7.107 and GSAM 507.107.

2. The level of concurrence and standard timeframes for completion are listed at GSAM 519.502-70(h)).

3. The completed and approved GSA 2689 shall be placed in the contract file as required.