
X NATIONAL

- NORTHERN ROCKIES CHAPTER
- PNW CHAPTER
- REGION 5 CHAPTER
- NATIONAL CONTRACT RESOURCES CHAPTER
- GREAT BASIN CHAPTER
- TIMBER FALLER CHAPTER



National Wildfire Suppression Association Concerns with Cascading Set-Aside Procedure 2010 Templates for Fire Equipment

The National Wildfire Suppression Association has advocated for decades to ensure that private fire resources are professional, well-trained and can be a long-term, sustainable employer in rural communities in which its members live and work. As created, the Cascading Set-Aside procedure in the 2010 templates for fire equipment puts this in jeopardy.

The 2010 fire equipment templates are the first time the U.S. Forest Service has used the Cascading Set-Aside procedure in determining awards and preparing the Dispatch Priority List (DPL)ⁱ. This two-step procedure first awards Blanket Purchase Agreements (BPA) to HUBZone certified small business concerns and/or Service Disabled Veteran Owned Small Business (SDVOSB) concerns. If insufficient awards are made to meet the anticipated need, further awards are made to small business concerns.

The second step is to construct the DPL by prioritizing orders. In this case, the highest priority for fulfilling orders (the top of the list) will be HUBZone and/or SDVOSB concerns. If more resources are required, then orders will be placed with responsible small business concerns on the listⁱⁱ.

In the past, the awards and DPL have been made based on price and advantage points (the latter being technical points based on equipment characteristics). There were no HUBZone or SDVOSB preferences prior to these 2010 templates. We have always felt this was a better form of competition and resulted in the best value for the government.

Our concern with the Cascading Set-Aside procedure is that the companies at the top of DPL are not necessarily the best value to the government based on price, equipment, or experience. Instead they are ranked highest simply because of their HUBZone or SDVOSB status. (A select set of DPLs are attached to exemplify how these awards and dispatch priorities are being made.)

This system does not take into account the years of experience of the contractor or prior performance, which raises serious concerns about the quality of service and safety of the firefighters.

Another concern is the added incentive for contractors to game the system. Audits by the Government Accountability Office (GAO) over the past several yearsⁱⁱⁱ have clearly demonstrated fraud and abuse in the

HUBZone and SDVOSB programs and we are concerned the cascade award system will incentivize more of this behavior.

Requested Remedy: NWSA would like to see the Cascading Set-Aside Procedure rescinded and replaced with a system that gives HUBZone and SDVOSB concerns preference points that are factored in with price, equipment, and experience in determining awards and dispatch priority.

ⁱ To see the templates, direct your web browser to: <http://www.fs.fed.us/business/incident/solicitations.php>

ⁱⁱ This process is found in the templates under Section B “Basis of Award”..

ⁱⁱⁱ See for example:

<http://www.gao.gov/new.items/d09519t.pdf>

<http://www.gao.gov/new.items/d09440.pdf>

<http://www.gao.gov/new.items/d09532t.pdf>

<http://www.gao.gov/new.items/d08964t.pdf>

<http://www.gao.gov/new.items/d08975t.pdf>

<http://www.gao.gov/new.items/d10458.pdf>

<http://www.gao.gov/new.items/d10740t.pdf>

<http://www.gao.gov/new.items/d10306t.pdf>

<http://www.gao.gov/new.items/d10255t.pdf>

<http://www.gao.gov/new.items/d10108.pdf>

Mailing : P.O. Box 330
Lyons,OR 97358
Physical: 1203 1st St.
Stayton,OR 97383

PHONE (877) 676-6972
FAX (866) 854-8186
E-MAIL info@nwsa.us
WEB SITE <http://www.nwsa.us>