

Women Shut Out of U.S. Government's Biggest Contracts

A Report for Women Impacting Public Policy Commissioned from NextWin Services, LLC.

October 2016

Dear Readers,

Women Impacting Public Policy has always sought to achieve parity for women entrepreneurs. The federal market is no exception.

For more than 15 years, WIPP has led the charge to create a women-owned contracting program that possesses the components of other small business contracting programs. Most recently, that entailed lifting dollar caps on WOSB set-asides, the addition of sole source authority, and the expansion of eligible industries in the program.

Strengthening the women's procurement program is only one of the ways WIPP is ensuring women business owners have equal opportunity to compete and win work with the federal government. Effective October, 2016, the Small Business Administration will welcome womenowned small businesses into their Mentor-Protégé Program, an excellent tool that has served other socio-economic communities well. WIPP advocated for legislative and regulatory efforts to bring this to fruition. These achievements are the hallmark of our procurement work over the last decade.

But disparity comes in many forms. The same report that led to the expansion of eligible industries in the WOSB Procurement Program concluded that women-owned firms are 21% less likely to win government contracts – even when controlling for past performance, size, and time in business. That astounding figure drove us to dig deeper into federal contracts and commission this report – the first of its kind – to examine certain types of contracts that reinforce disparity and keep women-owned firms out of the upper tiers of the federal contracting world.

Our findings are straightforward – like the title of the report, *Do Not Enter*. We are not in a position to explain the entirety of the disparity; we simply know it exists. We encourage you to consider both the conclusions and recommendations. WIPP will be bringing both the facts and needed changes to policymakers. We hope you will join us in this effort.

Lisa Firestone Chair, Board of Directors Ann Sullivan Chief Advocate



Table of Contents

Executive Summary	4
Glossary	5
Background	6
Findings	9
Finding #1: Major Contracts Leave WOSB Tracks Out1	0
Finding #2: Existing Disparities Reinforced, Even Exacerbated, on MACs1	1
Finding #3: With Access, WOSB Firms Win Work	3
Additional Findings1	4
Conclusions and Recommendations	4
Ensure Parity When Adding Tracks1	5
Create a WOSB GWACs1	5
Add and Enforce Onboarding Process on Major Contracts1	6
Report Socio-Economic Status of Contract Holders1	7
Looking Forward1	7
Data Sources and Methodology	9
Appendix 1: Contract Data	0
Appendix 2: Women-Owned Small Business Procurement Program Chronology3	0
Appendix 3: Overview of "Tracks" on MACs3	2



DO NOT ENTER: Women Shut Out of U.S. Government's Biggest Contracts

Executive Summary

By almost any metric, women business owners are an empowered and growing force in the American economy. They own more than a third of all businesses and, according to a recent American Express OPEN survey, are more optimistic about creating jobs in the coming year than their male counterparts.

Despite these marked successes and a proven ability to deliver innovative goods and services across the globe, this report has found clear evidence that women continue to have limited opportunities in the federal contracting space.

Over the last decade, federal agencies have favored large umbrella contracts with select vendors supplying unlimited goods or services over a specified period. These multiple-award contracts, or "MACs", have been scrutinized by the small business community as potentially harming small businesses, but never before considered as harming women entrepreneurs specifically.

Women Impacting Public Policy (WIPP) commissioned this report to determine if women entrepreneurs are being utilized in this significant portion of the federal marketplace. The analysis examined nineteen MACs, managed by seven agencies with a total estimated value of over \$253 billion across broad industry segments including information technology, human capital and training, and office supplies.

Importantly, some of these contracts have specific "tracks" reserved for certain types of small businesses, including women-owned, service-disabled veteran-owned, HUBZone, and 8(a). Others simply have large and small business pools. The report's key findings:

- ➤ Major contracts reserved awards for socio-economic groups *except* WOSB
- ➤ Unlike other groups, WOSBs lack an exclusive contract for IT procurements
- ➤ Disparities already identified by the U.S. Department of Commerce were reinforced if not exacerbated on many of the contracts, including one contract that had no WOSBs
- ➤ Once access to these contracts is gained, women-owned firms are successfully winning at the task order level, providing high quality services

While progress has certainly been made with respect to WOSBs in the federal market, barriers continue to exist. WIPP's analysis found that women are excluded from the federal government's most sought after contracts. While this report does not offer reasons as to why WOSBs lag so far behind, this research bears out the U.S. Department of Commerce's conclusion that women do not have equal opportunity in procurement. If women are not included in large, multi-year contracts, they will continue to lose out on the most lucrative opportunities the federal government awards.



GLOSSARY OF TERMS

Terms in the order they appear in the report.

SB Small Business

SBA Small Business Administration

GSA General Services Administration

WOSB Women-Owned Small Business

NAICS North American Industry Classification System (system

used by federal agencies to classify contracts by industry)

EDWOSB Economically Disadvantaged Women-Owned Small

Business

HUBZone Historically Underutilized Business Zone

8(a) The 8(a) or Socially and Economically Disadvantaged

Business Program run by SBA

SDVOSB Service-Disabled Veteran-Owned Small Business

Socio-economic Status References the SBA set-aside programs including WOSB,

EDWOSB, HUBZone, 8(a), and SDVOSB

MAC Multiple Award Contract (serves as an umbrella contract

with multiple vendors supplying goods or services over a

specified period of time)

MAS The Multiple Award Schedules are a type of MAC, set up

by GSA for government-wide use. Also referred to as the

GSA Schedules or Federal Supply Schedules (FSS)

IDIQ Indefinite Delivery, Indefinite Quantity (type of MAC that

allows for the indefinite supply and quantity of goods

and/or services under the umbrella contract)

GWAC Government-wide Acquisition Contract (MAC limited to

Information Technology (IT) goods/services)

DOC U.S. Department of Commerce

RFP Request for Proposal



DO NOT ENTER: Women Shut Out of U.S. Government's Biggest ContractsA New Report from Women Impacting Public Policy

Background

The U.S. Government is the largest buyer of goods and services in the world, spending over \$400 billion annually. Recognition that small businesses should have a place in this process dates back to the early 1950s¹ and was a factor in the creation of the Small Business Administration (SBA) in 1953. In its charter, SBA was charged with assuring that small businesses receive "maximum practicable opportunity" to compete for federal contracts².

In 1988, Congress saw the need to push the government to award significantly more small businesses contracts, and established a government-wide small contract goal for 20% of procurement dollars³. In 1994, Congress established a five percent goal for WOSBs⁴, and in 1997 the government-wide goal for small businesses was increased to 23%⁵.

In 2000, to increase participation by women entrepreneurs, Congress created the WOSB Procurement Program to enable women to compete for contracts in industries where women are underrepresented in federal contracting. Sixteen years later, the government met, for the first time, its five percent goal with women-owned small businesses. At the same time, the U.S. Department of Commerce issued a report detailing systemic disparity for women in federal contracting.

WIPP's Role in Advancing Women in the Federal Market

Since its inception in 2001, Women Impacting Public Policy (WIPP) has led the charge to ensure the women-owned contracting program had the same tools that support other small business contracting programs. WIPP has spent the past 15 years educating and advocating on behalf of the nation's women entrepreneurs, with a laser focus on federal procurement policy. WIPP has successfully advocated for expanding the North American Industry Classification System (NAICS) codes in the WOSB program, removing the caps on the dollar amounts of contracts awarded under the WOSB program as originally written, and most recently, inclusion of sole source contract authority in the program⁶.

⁶ A full timeline of the progression of the WOSB program is included in Appendix 2.



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¹ Def. Prod. Admin., B-103235, 30 Comp. Gen. 441 (1951) *available at* http://www.gao.gov/products/B-103235#mt=e-report.

² Small Business Act of 1953, Pub. L. No 83-163 (as amended) (1953).

³ Business Opportunity Development Act of 1988, Pub. L. No. 100-656, § 502, 102 Stat. 3853, 3881 (1988).

⁴ The Federal Acquisition Streamlining Act of 1994, Pub. L. No. 103-355, § 7106, 108 Stat. 3243, 3374-76 (1994).

⁵ Small Business Reauthorization Act of 1997, Pub. L. 105-135, § 603, 111 Stat. 2592, 2362 (1997) (The goal was increased to reflect the creation of a new set aside program for economically distressed areas, titled HUBZone).

While it took over 10 years for the federal government to implement the program, and over twenty years to reach the statutory five percent goal, female entrepreneurs are more engaged in seeking federal opportunities than ever before.

While 2016 marked a breakthrough for the WOSB program with the government achieving the five percent contract goal set by Congress, a January 2016 report issued by the U.S. Department of Commerce showed that the odds of a WOSB winning a federal contract are 21% lower than for otherwise similar companies, when controlling for past performance, size, time in business, and socio-economic status. The report also found that women-owned businesses have statistically significant lower odds of winning contracts in industries that make up two-thirds of contracted federal dollars⁷.

WOSB vs. EDWOSB

Within the WOSB program, there is an important distinction between Women-Owned Small Businesses (WOSBs) and Economically-Disadvantaged Women-Owned Small Businesses. The latter (EDWOSBs) have income requirements to qualify.

For the purposes of this report, WIPP is only reviewing through the lens of WOSB. While the impact of MACs on EDWOSBs is likely significant, this report focuses solely on the impact of the broader WOSB population.

The Growing Use of Multiple Award Contracts

A few years before SBA was established, Congress created a federal agency to manage the business of the government, and help agencies with their buying requirements⁸. The U.S. General Services Administration (GSA) was tasked with leveraging federal buying power by performing procurement and supply services for agencies. GSA, in turn, created mandatory long-term government-wide contracts called Multiple Award Schedules that provided agencies with access to millions of products and services at volume discount pricing. In the 1990s, these contracts were deemed non-mandatory and individual agencies began creating their own large contracts for both their own and government-wide usage.

For the past several years, as the Women-Owned Small Business (WOSB) program has been implemented, the nature of federal contracting has changed once again. Since the passage of the Budget Control Act of 2011, and the ensuing squeezing of federal spending, many agencies have started favoring longer-term contracts over direct individual awards⁹.

⁹ Sequestration: Small Business Contractors Weathering the Storm in a Climate of Fiscal Uncertainty, S.Comm. on Small Business and Entrepreneurship 113th Cong. 345 (2013)



⁷ David N. Beede, Robert N. Rubinovitz, *Utilization of Women-Owned Businesses in Federal Prime Contracting* U.S. Department of Commerce, Office of the Chief Economist, Economics and Statistics Administration, (December 31, 2015), *available at* https://www.sba.gov/sites/default/files/wosb_study_report.pdf

⁸ Federal Property and Administrative Services Act of 1949, Pub. L. No 81-152 (1949).

These large umbrella contracts, with multiple vendors supplying unlimited goods or services over a specified period, often five to ten years, are growing in popularity. These mega contracts allow agencies to limit competition to a pre-approved list of vendors and issue task orders, or work orders, to a business already on the contract¹⁰. The belief by many in government is that such contracts minimize acquisition burdens while achieving improved economies of scale¹¹.

Over the past several years, as government spending has shrunk, these large multiple award contracts have grown to 21% of federal spend, with a growth rate of over \$100 million between fiscal years 2013 and 2014¹². In fiscal year 2017, 17 of the 20 largest opportunities are MACs¹³.

This trend runs counter to a renewed interest of Congress in the use of a diverse group of small businesses from across the socio-economic spectrum. SBA established the WOSB procurement program, and other set-aside programs including 8(a) Business Development Program, Historically Underutilized Business Zone (HUBZone), and Service-Disabled Veteran-Owned Small Businesses (SDVOSB), to allow agencies to work directly with small, underrepresented businesses. The incorporation of that priority with MACs has left each agency to determine how to best ensure all groups have an opportunity to compete.

Importantly, both the U.S. Department of Justice and Congress have been clear in directing that no individual group have preference over another¹⁴. Although agencies are not required to include socio-economic groups in these large contracts, exclusion of any of these groups, including women owned companies, would represent significant federal spending that is now inaccessible.

The nomenclature for MACs is diverse. Certain industries have unique acronyms (e.g. GWACs serve only IT-industries), while individual agencies use disparate but ultimately synonymic terms. The alphabet soup of IDIQs, BPAs, IDVs, IDCs, MATOCs, etc. all point toward the key idea of two phase contracting: initially awarding one contract to multiple companies, and second,

https://www.justice.gov/sites/default/files/olc/opinions/2009/08/31/sba-hubzone-opinion082109 0.pdf.



¹⁰ National Contract Management Association and Bloomberg Government, *Annual Review of* Government Contracting, (2015 Edition) available at http://www.ncmahq.org/docs/defaultsource/default-document-library/pdfs/exec15---ncma-annual-review-of-government-contracting-2015edition.

¹¹ WIPP has advocated for increased oversight of this trend as it threatens a wide base of contracting firms. That issue, however, is outside the purview of this report.

¹² Annual Review of Government Contracting, supra note 10.

¹³ Bloomberg Government, *Top 20 Opportunities in Fiscal 2017* (September 28, 2016)

¹⁴ United States Department of Justice, PERMISSIBILITY OF SMALL BUSINESS ADMINISTRATION REGULATIONS IMPLEMENTING THE HISTORICALLY UNDERUTILIZED BUSINESS ZONE, 8(A) BUSINESS DEVELOPMENT, AND SERVICE-DISABLED VETERANOWNED SMALL BUSINESS CONCERN PROGRAMS, (August 21, 2009) available at

allowing the pre-selected firms to compete for certain requirements called task orders. It is the impact of this structure, specifically on women business owners, that this report investigates.

Findings

From the outset, WIPP focused on answering three key questions as it relates to MACs and WOSBs:

- 1. Are "tracks" reserved for WOSBs similar to other socio-economic groups?
- 2. To what extent are women-owned firms represented on MACs?
- 3. Are women winning actual work on these contracts?

These three components offer a deep insight into large contracts, with the goal of identifying where barriers exist that require policymakers' attention. The first question examines if WOSBs are guaranteed opportunities to compete on contracts via "tracks" similar to other socioeconomic groups. Senior acquisition personnel at the very beginning of the procurement process make these decisions. These tracks – a relatively new method – are a tool to ensure certain socioeconomic groups have the opportunity to compete for task orders.

The second question gets to the core of acquisition parity. Whether there are tracks or not, are women-owned firms winning spots on these contracts. As detailed below, WIPP compared the percentage of women-owned firms on these contracts with the benchmark percentage found by the U.S. Department of Commerce in their 2016 report. For WOSBs to have an opportunity to win work, they must first have adequate access to the contracts.

Third, it is important to measure the success of WOSBs once awarded these contracts. Are they winning work as task orders are issued? It is at the task order level that the merits of womenowned firms can best be considered.

Additional details on the methodology and data sources can be found at the end of the report and provide context as to why WIPP identified 19 MACs from seven agencies. Of the hundreds of these contracts, these 19 were among the largest, representing over \$250 billion in federal spend, had been raised previously by WIPP members, and represented diverse industries when possible.

Finally, throughout the findings and conclusions WOSB and women-owned are used interchangeably. While many women-owned firms have outgrown their size standards, this report focused on WOSB and as such, at the author's discretion, the terms are used with the same meaning.



Finding #1: Major Contracts Leave WOSBs Out

Of the nineteen contracts examined, twelve provided tracks for certain set-aside groups.¹⁵ Of those twelve, only three (CIO-SP3 SB, ENCORE II, and ENCORE III) had tracks for WOSBs. Conversely, 9 of the 12 (see Figure 1) analyzed, representing more than \$100 billion, maintained tracks for other socio-economic groups but not women.

Figure 1. MAC Contracts with Tracks (contracts appear in chronological order)

Contract	Total Est. Value	WOSB TRACK
STARS	\$15 billion	
SEWP IV	\$5.6 billion	
VETS	\$5 billion	
ENCORE II	\$12.2 billion	✓
STARS II	\$10 billion	
CIO SP3-SB	\$20 billion	✓
EAGLE II	\$22 billion	
SEWP V	\$20 billion	
OS3	\$1.25 billion	
T4NG ¹⁶	\$22.3 billion	
ENCORE III	\$17.5 billion	✓
VETS II	\$5 billion	

While five of these contracts pre-date the implementation of the WOSB program, the two should not be conflated.¹⁷ The authority to set up tracks for each socio-economic group is unrelated and predates the WOSB program as evident in ENCORE II, which had a women's track prior to the WOSB program's final implementation.

As noted earlier, these multi-billion dollar contracts are becoming the major buying sources for all Information Technology (IT) government-wide. On some, there is a clear lack of parity between WOSB and other socio-economic groups.

¹⁶ All contracts at the Department of Veterans Affairs are now expected to provide a preference to veteran-owned small businesses (VOSBs) per the recent *Kingdomware Technologies, Inc. v. United States* decision. For the purposes of this report, that change is not considered a track but does provide an example of additional restrictions at certain agencies. The report does not discuss further this impact.

¹⁷ Alliant Small Business, SEWP IV, Encore II, STARS, and VETS.



¹⁵ The others did not indicate a socio-economic track, but might have had a small business pool.

Within IT acquisition, MACs created for government-wide use are special contracts called Government-wide Acquisition Contracts (GWACs). Fourteen of the contracts analyzed fall into this category created only for IT. Critically, WOSBs are currently left without their own Government-wide Acquisition Contracts (GWACs) like 8(a) STARS and STARS II, VETS, and VETS II.

A Silver Lining

NIH CIO SP3 is made up of thirty percent WOSB, and has obligated over one-third of contract dollars to women-owned firms.

These contracts are populated only by firms that are 8(a) or, in the case of VETS, small businesses owned by service-disabled veterans (SDVOSBs). A contract specific to womenowned companies is left out of the existing GWACs¹⁸. While women are not expressly disqualified from bidding, women who do not fit these additional categories may be excluded from the process. Even if they compete for GWACs under a general small business category, women will not make the necessary inroads without specific GWAC tracks. The spend on these contracts is significant. STARS II has awarded more than \$4 billion and VETS has awarded more than \$1 billion.

Finding #2: Existing Disparities Reinforced, Even Exacerbated, on MACs

Of the 19 contracts, only 13 have been awarded and thus allow for analysis of the types of companies receiving spots¹⁹. Within those 13 contracts that have been awarded, WIPP found a wide variance on the prevalence of women-owned firms. While winning a spot on the contract does not guarantee work, it is a prerequisite to providing goods or services.

To identify whether WOSBs were adequately represented on a given contract, the ratio of WOSBs to the total number of firms on the contract (expressed as a percentage) was compared with the prevalence of women-owned firms in the contracts' primary NAICS code as found in the 2016 Department of Commerce report²⁰. For contracts with Small Business (SB) only pools, WIPP only considered the total number of small business firms. As a benchmark for the expected number of WOSBs, WIPP used the frequency of WOSB firms in the 2016 Department of Commerce report²¹.

²¹ David N. Beede, Robert N. Rubinovitz, *Utilization of Women-Owned Businesses in Federal Prime Contracting*U.S. Department of Commerce, Office of the Chief Economist, Economics and Statistics Administration, (December 31, 2015), *available at* https://www.sba.gov/sites/default/files/wosb_study_report.pdf



¹⁸ The HUBZone socio-economic group is also without a GWAC.

¹⁹ Data from 8(a) STARS I was determined to be unreliable due to age and was removed from this section's analysis.

²⁰ For contracts with more than one primary four digit NAICS code, WIPP selected the NAICS code that is expected to be utilized to the greatest extent on task orders.

Figure 2 (below), illustrates the difference between WOSB representation in the federal market as a whole, as represented by the Department of Commerce Report, and WOSB participation on the examined contracts. It is important to note, that the benchmark itself already represents a disparity for WOSBs (and hence the expansion of the program).

Figure 2. WOSB Representation in the federal market, MAC Contracts by primary NAICS (contracts appear in chronological order)

Contract Title	Agency	Total Est. Value	Firms on Contract	WOSB on Contract	% WOSB firms	DOC Report %	Difference
_						•	
SEWP IV	NASA	\$5.6 billion	38	7	18.42%	24.48%	-6.06%
VETS	GSA	\$5 billion	31	3	9.68%	24.48%	-14.80%
Encore II	DISA	\$12.25 billion	26	4	15.38%	22.06%	-6.68%
Alliant SB	GSA	\$15 billion	68	24	35.29%	24.48%	10.81%
STARS II	GSA	\$10 billion	581	114	19.62%	24.48%	-4.86%
ITSS-IV	DOJ	\$1.1 billion	19	0	0.00%	24.48%	-24.48%
CIO SP3-SB	NIH	\$20 billion	101	31	30.69%	24.48%	6.21%
EAGLE II	DHS	\$22 billion	90	20	22.22%	24.48%	-2.26%
OASIS SB ²²	GSA	\$60 billion	129	19	14.73%	35.53%	-20.80%
OS3	GSA	\$1.25 billion	24	10	41.67%	23.12%	18.55%
SEWP V	NASA	\$20 billion	161	39	24.22%	24.48%	-0.26%
T4NG	VA	\$22.3 billion	21	2	9.52%	24.48%	-14.96%
HCATS SB ²³	GSA	\$5 billion	37	14	37.84%	30.75%	7.09%

Of the 13 contracts, 8 were worse than the benchmark, meaning the disparity was greater than found by DOC government-wide. The remaining 5 were close to the benchmark meaning that while slightly improved, disparity still pervades these contracts and should be addressed. The

²³ HCATS SB Identified two primary NAICS codes. Both were used and averaged for the calculation.



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²² GSA Preliminary marked research indicated NAICS code, 541611, "would best represent the primary services to be provided under task orders" available at https://interact.gsa.gov/blog/selecting-right-naics-code-oasis-seeking-your-feedback

table below shows the 13 contracts and the supporting data – the final column represents the relationship to the DOC disparity (the darker the shade of red, the more disparity).

Finding #3: With Access, WOSB Firms Win Work

Of the 19 contracts, only 11 had complete spending data to allow for analysis of actual dollars received. One of those (ITSS IV) had zero women-owned firms and was thus excluded from research of the amount of work WOSBs performed.

WIPP's analysis showed that the 263 WOSBs on the 10 MACs receive substantial work. Of the \$24.2 billion spent on these contracts, WOSBs received \$4.86 billion – or approximately 20%. Given the government-wide spend with women has only just reached five percent, the 20% on these contracts shows a substantial increase in the ability of WOSBs to win task orders time and again.

These wins were not limited to contracts with WOSB tracks only. For example, NASA's SEWP V contract, which includes large and small businesses, has awarded over 24% of total contract spend to 39 women-owned firms in the last year and a half. Only one contract (VETS) was below the five percent threshold. Figure 3 shows the percentage of dollars on each contract awarded to WOSBs. It includes a marker for the five percent threshold to provide visual context of the goal.

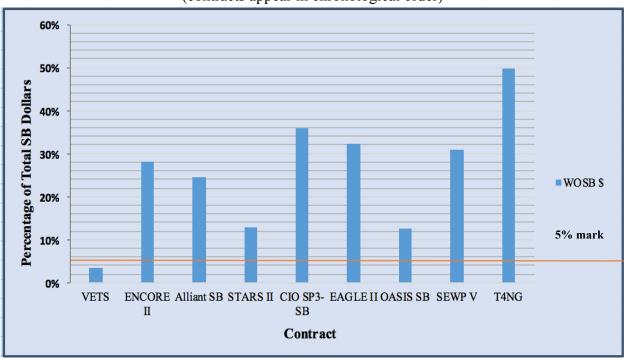


Figure 3. Percent of Spend with WOSB (contracts appear in chronological order)



Additional Findings

Certain MAC RFPs Inherently Create Barriers for Small Firms

In reviewing the Request for Proposals (RFPs) for each of these contracts, WIPP identified concerning requirements that may act as barriers for participation of WOSBs, and small businesses more generally.

Specifically, GSA recently issued an RFP for an Alliant 2 Small Business and an Alliant 2 unrestricted contract, as a follow-on to the popular first generation IT-based Alliant contracts. While the total value for Alliant 2 unrestricted increased, the past performance requirements on both Alliant unrestricted and the small business contract are so burdensome there are few firms that can meet the requirements. The unrestricted contract requirements are burdensome, including DCAA audits, and disproportionate past task order awards; they effectively exclude all but the largest firms from competing. The small business contract will only accept prime contractor experience for past performance requirements. While this is just one example, it shows that barriers women face are not only written in the FAR, but also in individual RFPs.

Disparities Not Limited to WOSBs

In the research, WOSBs were not the only socio-economic group inexplicably excluded from certain contracts. One contract (ENCORE III) had no track for 8(a), while another (SEWP IV) lacked a HUBZone track. As a matter of principle, socio-economic groups under the Small Business Act should experience parity with respect to government contracts. In addition, many WOSBs also qualify for SDVOSB, 8(a) and the HUBZone program; in fact WOSBs are more likely (52%) to report belonging to groups for which the Federal government has contracting goals compared to 38% of other small businesses²⁴.

Conclusions and Recommendations

The federal market is in the midst of a seismic change. Beginning decades ago, new contract types and strategies are developed in efforts to improve the acquisition process and assure the government best value. These changes, however, affect women-owned companies. While there are certainly benefits to MACs, including federal supply schedules, GWACS and IDIQs, they all constrain participation especially for small and midsize companies. Government acquisition experts may consider them necessary for 21st century procurement, but by their very definition,

²⁴David N. Beede, Robert N. Rubinovitz, *Utilization of Women-Owned Businesses in Federal Prime Contracting* U.S. Department of Commerce, Office of the Chief Economist, Economics and Statistics Administration, (December 31, 2015), *available at* https://www.sba.gov/sites/default/files/wosb_study_report.pdf



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they limit competition – inhibiting the ability of small businesses in particular, to pursue certain opportunities.

The initial costs of these contracts are much harder for smaller businesses to bear than their larger counterparts, both in terms of resources and time (e.g. the nearly year-long waiting period to get on certain GSA Schedules). Similarly, it appears that the government's vision of procurement is one that seeks to categorize customized services into narrow categories. However, individual agencies, due to their distinct missions and programs, have unique requirements.

WIPP's research into this changing nature of procurement has found that women business owners continue to face barriers when contracting with the federal market. As contracts become bigger and span longer periods of time, advocates have fewer and fewer opportunities to push for changes that can ensure innovative and competitive women entrepreneurs have a fair chance at awards.

Like all research projects, the universe of MACs was too vast to examine. We chose instead to examine a sample of the largest contracts to see if trends could be identified. Nevertheless, the findings suggest that the deeper research goes, the more contracts with systemic barriers for entry will be found. To combat this, WIPP proposes the following recommendations based on the finding of this report:

1. Ensure Parity When Adding Tracks

MACs that contain a socio-economic set-aside track(s), should have tracks for all groups, including WOSB, HUBZone, 8(a), and SDVOSB. This would align these major contracts with the consistent belief of Congress and agencies that there should be no preference among socio-economic categories. Alternatively, contracts can be made without tracks (e.g. only large and small pools), but efforts to secure a diverse pool of companies should be made.

The WOSBs that successfully gained access to these MACs have received significant work. This shows that given the opportunity, WOSBs can successfully compete for federal work.

2. Create a WOSB GWAC

The most obvious disparity between socio-economic groups is the existence of exclusive contracts for individual groups—i.e. the STARS I & II 8(a) contracts and VETS I & II for SDVOSBs. These contracts guarantee significant work goes to these communities.



8(a) firms have already received over \$8 billion from both STARS contracts and veteran-owned firms have received over \$1.6 billion from VETS, with more expected on the follow-on VETS II. WIPP recognizes the need for agencies to achieve individual socio-economic goals, and is seeking a GSA WOSB GWAC to assist agencies in reaching WOSB goals.

3. Add and Enforce Onboarding Processes on Major Contracts

The growing duration of these contracts – some are 10 years long – presents another barrier for women-owned firms that have been overlooked in the award process. Given the disparity found in this report, it seems appropriate that remedies happen sooner rather than later.

One option is to have a robust onboarding process, which effectively allows more firms to join a contract already in process. This could also alleviate disparities found for other groups (as seen in Appendix 3). This change benefits the government as well. Innovations and new ventures, especially in IT, cannot be added without an onboarding process.

This recommendation is not new, particularly for WIPP, which has advocated for improved onboarding process. Agencies can onboard new businesses to a MAC for a number of reasons including specific business contract expiration, small businesses exceeding small business size standards, and agency interest in additional socio-economic groups on the contract²⁵. In September 2016, GSA announced plans to open Pool 2 of OASIS Small Business, the largest professional services MAC, to ensure there are multiple small businesses for competitive set-asides from each socio-economic group²⁶. The announced steps are a good example of inclusive onboarding, and one GSA should utilize for other contracts where WOSBs are underrepresented.

In the course of research for this report WIPP found a number of women-owned, and other small businesses, were purchased by large businesses. While the acquisition of a business can be optimal for a small business owner, in the cases where the purchase alters the small business size status, agencies should utilize onboarding. In doing so, agencies can ensure a sufficient number of small businesses of all types can perform work on a contract.

More research is necessary to determine the utilization of onboarding authority, however, anecdotal evidence suggests this rarely occurs. WIPP recommends that agencies onboard WOSBs for MAC contracts over \$1 billion that do not have a track for WOSB, and where

https://www.bgov.com/core/news/#!/articles/ODTB5N6JIJUT? Procurement_20160923=&etReferrerLink=Contracting_



²⁵ Aaron Boyd, *NIH wants more veteran, HUBZone small businesses on GWAC*, Federal Times, (March 17, 2016) available at, http://www.federaltimes.com/story/government/it/health/2016/03/17/cio-sp3-ramp-on/81905732/.

²⁶ Daniel Snyder, Look Ahead: OASIS Small Business Begins Open Season, Bloomberg Government (September 20, 2016) available at,

women-owned firms are underrepresented to an even greater degree than defined in the 2016 U.S. Department of Commerce Report.

4. Report Socio-Economic Status of Contract Holders

While some multiple award contracts publish the socio-economic status of vendors alongside vendor name and contract point of contact, not all agencies make this information easily accessible. For example, GSA published a list of OS3 awardees by both size and socio-economic status²⁷. In contrast, GSA did not publish socio-economic status for vendors on the recently awarded HCATS contract²⁸. If federal agencies made socio-economic information available for women-owned firms, it would help contracting agencies identify the WOSBs that can assist the agency in reaching contracting goals as well as make diversity among types of firms obvious.

Looking Forward

Over a third of contracts WIPP analyzed are either draft RFPs, recently issued RFPs, or too new to provide spend data. An emphasis was placed on looking forward because WIPP is committed to making more opportunities available for women entrepreneurs.

More than \$20 billion will be awarded on these contracts in the coming years. Ensuring that WOSBs have adequate access should be paramount to the nation's economy. Agencies are encouraged to review contracts that expect significant spend to find ways to include womenowned firms.

Agencies can correct this inequity by using strategies they already use such as development of separate tracks and onboarding. Ensuring WOSBs have a fair shot at participating in the federal acquisition process will not only bring parity to the 10 million women entrepreneurs currently contributing to the US economy, but will serve to strengthen the small business industrial base this nation depends upon.

In the course of research for this report errors in individual contracts were identified. Agencies were notified and in many cases made the necessary adjustments. For example, DISA's upcoming \$17.5 billion information technology contract, Encore III contained a track for EDWOSB, though the assigned contract NAICS code is for WOSB. DISA was notified of this error, and in September 2016 the Encore III RFP was reissued with the appropriate NAICS code. Given the scale of the federal government's buying – more than \$400 billion each year – these

²⁸ General Services Administration, Human Capital and Training Solutions (HCATS) (2016) available at http://www.gsa.gov/portal/content/124018



²⁷ General Services Administration, Awarded Vendors and solution Portals (FSSI OS3) (2016) available at http://gsa.gov/portal/content/207247

kinds of issues are to be expected. A shrinking contracting workforce and changing technologies require constant focus and attention of thousands of men and women across the country.

WIPP is grateful to the entire acquisition workforce and looks forward to working with procurement personnel to ensure that women business owners have the access, education, and ability to compete for and win government contracts – ultimately providing the federal government with innovative and cost-effective solutions.



Data Sources and Methodology

The aim of this report is to look at federal contracting outcomes for women-owned small businesses on large MAC contracts, in comparison to other small businesses. To do so, WIPP selected nineteen well known, utilized, and anticipated multiple award contracts (MACs) from seven of the largest buying agencies including the U.S. Department of Defense (DOD), the U.S. Department of Health and Human Services (HHS), the U.S. Department of Veterans Affairs (VA), the U.S. Department of Homeland Security (DHS), The U.S. General Services Administration (GSA), the National Aeronautics and Space Administration (NASA), and the U.S. Department of Justice (DOJ).

Contracts were also selected based on their usage by either components of an agency, like Information Technology Support Services IV at DOJ, or government-wide use like NASAs Solutions for Enterprise Government (SEWP) V.

In order to examine MAC contract scope and spend over time and industry, the contracts all have estimated values greater than \$1 billion and span from fiscal year 2004 to 2029. The contracts also cover varied industries including information technology, human capital and training, and office supplies with a total estimated value greater than \$250 billion.

Federal contracting data was compiled using Bloomberg Government, federal agency materials, the System for Award Management (SAM), and SBA's Dynamic Small Business Search (DSBS). To look at the MAC contract landscape beyond fiscal year 2016, Bloomberg Government, Federal Business Opportunities (FBO), and industry publications were utilized.

Appendix 1 includes the details of each contract in this research. The data used to support this analysis can be made available upon request.



Appendix 1: Overview of Contracts Included in Analysis

Spending and award data accurate as of August 18, 2016. Contracts are listed in alphabetical order (by MAC acronym).

ALLIANT SMALL BUSINESS (GSA)

FY2009-FY2019

http://www.gsa.gov/portal/content/104964

Alliant Small Business provides agencies flexible access to customized IT solutions from a large, diverse pool of small businesses. Alliant Small Business also allows for long-term planning of agency large-scale program requirements.

Small business set-aside contract

Track: All Small Business

Dollars Obligated: \$4.365 billion Total Estimated Value: \$15 billion Number of firms on Contract: 68

Small business contract dollars: \$3.25 billion WOSB on contract receiving task orders: 24 WOSB contract dollars: \$795.3 million

Contract Access Fee: 0.75% Primary NAICS: 5415

ALLIANT SMALL BUSINESS II (GSA)

FY2018-FY2028

http://www.gsa.gov/portal/content/183035

Alliant Small Business II, is expected to provide agencies flexible access to customized IT solutions from a large, diverse pool of small businesses. Alliant Small Business will allow for long-term planning of agency large-scale program requirements.

Small business set-aside contract

Track: All Small Business Dollars Obligated: n/a

Total Estimated Value: \$15 billion

Number of firms on Contract: 80 are anticipated

Small business contract dollars: n/a

WOSB on contract receiving task orders: n/a

WOSB contract dollars: n/a Contract Access Fee: 0.75% Primary NAICS: 5415



CHIEF INFORMATION OFFICER- SOLUTIONS AND PARTNERS 3 (CIO SP3 SB) (NIH)²⁹

FY2012-FY2022

https://nitaac.nih.gov/services/cio-sp3-small-business

CIO SP3 SB offers a wide range of labor categories for task order in support of everying IT and offers a wide range of IT services, spanning ten task areas.

Single contact with large and small businesses

Track: HUBZone, SDVOSB, 8(a), WOSB, EDWOSB

Dollars Obligated: \$164 million Total Estimated Value: \$20 billion

Number of firms on Contract: 94 total (87 small business)

Small business contract dollars: \$1.87 billion WOSB on contract receiving task orders: 13 WOSB contract dollars: \$671.7 million

Contract Access Fee: 0.55% with a cap of \$150,000 for any task order base or optional period

(not to exceed 12 months) with funding in excess of \$27 million

Primary NAICS: 5415

ENTERPRISE ACQUISTION GATEWAY FOR LEADING EDGE SOLUTIONS (EAGLE) II (DHS)

FY2013-FY2020

https://www.dhs.gov/eagle-ii

Eagle II is specifically designed as the preferred source of information technology (IT) services for the majority of the Department of Homeland Security's (DHS's) enterprise infrastructure and initiatives

Single contact with large and small businesses Track: 8(a), HUBZone, SDVOSB, all small

Dollars Obligated: \$1.2 billion Total Estimated Value: \$22 billion

Number of firms on Contract: 90 (61 small businesses) Small business contract dollars: \$554.85 million WOSB on contract receiving task orders: 20

WOSB contract dollars: \$179.8 million

Contract Access Fee: no fee for DHS components

Primary NAICS: 5415

²⁹ The Primary NAICS for this contract is 541512 (Computer Systems Design Services) was moved from the EDWOSB program to the WOSB program in March 2016.



ENCORE II (DISA-DOD)

FY2008- FY2018

http://www.disa.mil/mission-support/contracting

Encore II provides technical solutions for DOD in support of migration to an integrated and interoperable DOD Information Network, as well as other federal agency IT hardware/software, migration and integration needs.

Single contact with large and small businesses

Track: At least one award to the following categories: HUBZone, WOSB, and SDVOSB, in

addition to other small businesses. Dollars Obligated: \$4,866,007,468 Total Estimated Value: \$12,225,000,000

Number of firms on Contract: 26 firms (12 small businesses)

Small business contract dollars: \$785,779,355 WOSB on contract receiving task orders: 4 WOSB contract dollars: \$220,447,947

Contract Access Fee: 1% external agency fee

Primary NAICS: 4517

ENCORE III (DISA-DOD)

FY2018- FY2029

 $\underline{\text{https://www.fbo.gov/index?s=opportunity\&mode=form\&id=02f89205a546e6874148234739e9a}}\\ c95\&tab=core\&cview=1$

Encore III is expected to provide technical solutions for DOD in support of migration to an integrated and interoperable DOD Information Network, as well as other federal agency IT hardware/software, migration and integration needs.

Single contact with large and small businesses

Track: Government intends to maintain at least one small business in each set-aside HUBZone,

SDVOSB, and WOSB Dollars Obligated: n/a

Total Estimated Value: \$17.5 billion

Program Duration: tbd

Number of firms on Contract: n/a Small business contract dollars: n/a

WOSB on contract: n/a

WOSB on contract receiving task orders: n/a

WOSB contract dollars: n/a

Contract Access Fee: 1% external agency fee

Primary NAICS: 5415



FLEXIBLE AGILE SUPPORT FOR THE HOMELAND (FLASH) (DHS)

Anticipated FY2017-FY2027

https://fcw.com/articles/2016/06/28/dhs-flash-vehicle.aspx

FLASH is expected to provide DHS with agile design and development support services. The contract will include concepts from the U.S. Digital Services Playbook such as user-centered design, dev-ops, automated testing and agile.

Small Business set-aside contract

Track: all small business Dollars Obligated: n/a

Total Estimated Value: \$1.54 billion

Program Duration: n/a

Number of firms on Contract: n/a Small business contract dollars: n/a

WOSB on contract: n/a

WOSB on contract receiving task orders: n/a

WOSB contract dollars: n/a Contract Access Fee: tbd Primary NAICS: 5415

HUMAN CAPITAL AND TRAINING SOLUTIONS (HCATS) (GSA)

FY2016-FY2022

http://www.gsa.gov/portal/category/100378

HCATS is a partnership between the U.S. Office of Personnel Management (OPM) and the General Services Administration (GSA). The solution is a new government-wide contract to support OPM's Training and Management Assistance (TMA) program, and provides customized human capital management and training services to all agencies.

Small business set-aside contract

Track: all small business Dollars Obligated: n/a

Total Estimated Value: \$5 billion Number of firms on Contract: 37 Small business contract dollars: n/a

WOSB on contract receiving task orders: n/a

WOSB contract dollars: n/a Contract Access Fee: 2% Primary NAICS: 6114



INFORMATION TECHNOLOGY SUPPORT SERVICES (ITSS-IV) (DOJ)

FY2012-FY2017

https://www.justice.gov/business/itss

ITSS-IV is a competitive contract designed to provide IT services to DOJ components.

Single contact with large and small businesses

Track: all small business

Dollars Obligated: \$388 million Total Estimated Value: \$1.1 billion

Number of firms on Contract: 19 (3 small businesses)

Small business contract dollars: \$21.49 million

WOSB on contract: 0

WOSB on contract receiving task orders: n/a

WOSB contract dollars: n/a

Contract Access Fee: \$0-\$1M 3.5%, \$1M-\$10M 2%, >10M 0.5%

Primary NAICS: 5415

INFORMATION TECHNOLOGY SUPPORT SERVICES (ITSS-V) (DOJ)

FY2016-FY2021

https://www.justice.gov/business/itss

Information Technology Support Services (ITSS-5) is expected to be competitive IDIQ contract providing IT services to DOJ components.

Single contact with large and small businesses

Track: all small business Dollars Obligated: n/a

Total Estimated Value: \$1.4 billion Number of firms on Contract: n/a Small business contract dollars: n/a

WOSB on contract: n/a

WOSB on contract receiving task orders: n/a

WOSB contract dollars: n/a

Contract Access Fee: fee-for-service

Primary NAICS: 5415



OASIS SMALL BUSINESS (GSA)

FY2014- FY2024

http://www.gsa.gov/portal/category/104731

OASIS Small business provides agencies with flexible and innovative solutions for complex professional services. The contract spans multiple professional services disciplines, and spans many areas of expertise.

Small business set-aside contract

Track: All Small Business

Dollars Obligated: \$848.1 million Total Estimated Value: \$60 billion Number of firms on Contract: 129

Small business contract dollars: \$848.1 million WOSB on contract receiving task orders: 19

WOSB contract dollars: \$107 million

Contract Access Fee: < 0.75% (0-100M, 0.75%. 100M-250M, 0.5%. 250M-500M, 0.25%. 500M

over, 0.1%)

Primary NAICS: 5416

OFFICE SUPPLIES III (OS3) (GSA) FY2015-FY2020

http://www.gsa.gov/portal/content/195439

OS3 is GSA's government-wide solution for the procurement of office supplies. The solution includes a wide range of products including paper, toner/ink, and features like in-store and express delivery options.

Single contact with large and small businesses

Track: SDVOSB, Partnership Agreement, HUBZone

Dollars Obligated: tbd

Total Estimated Value: \$1.25 billion

Number of firms on Contract: 24 (23 small businesses)

Small business contract dollars:

WOSB on contract receiving task orders: 10

WOSB contract dollars: n/a Contract Access Fee: n/a Primary NAICS: 3399



SOLUTIONS FOR ENTERPRISE-WIDE PROCUREMENT (SEWP IV) (NASA)

FY2007- FY2015

http://www.sewp.nasa.gov/

SEWP (pronounced 'soup') is a multi-award Government-Wide Acquisition Contract (GWAC) vehicle focused on commercial IT products and product based services.

Single contact with large and small businesses

Track: Small Business, SDVOSB, 8(a) non-competitive with limited work up to \$4 million.

Dollars Obligated: \$15.5 billion Total Estimated Value: \$5.6 billion

Number of firms on Contract: 38 total (30 small business)

Small business contract dollars: \$9.09 billion WOSB on contract receiving task orders: 7

WOSB contract dollars: \$1.1 billion

Contract Access Fee: 0.45% for \$0 - \$2,222,222, and \$10,000 cap for \$2,222,222 on up

Primary NAICS: 5415

SOLUTIONS FOR ENTERPRISE-WIDE PROCUREMENT (SEWP V) (NASA)

FY2015- FY2025

http://www.sewp.nasa.gov/

SEWP (pronounced 'soup') is a multi-award Government-Wide Acquisition Contract (GWAC) vehicle focused on commercial IT products and product based services.

Single contact with large and small businesses Track: Small Business, HUBZone, SDVOSB

Dollars Obligated: \$2.6 billion Total Estimated Value: \$20 billion

Number of firms on Contract: 161 total (120 small business)

Small business contract dollars: \$2.2 billion WOSB on contract receiving task orders: 39 WOSB contract dollars: \$667.5 million

Contract Access Fee: 0.39% Primary NAICS: 5415



STARS I (GSA)

FY2004-FY2011

http://www.gsa.gov/portal/content/105243#

8(a) STARS I provided flexible access to customized IT solutions including custom computer programming services, computer systems design services, computer facilities management services; and other computer related services.

Small business set-aside contract

Track: 8(a)

Dollars Obligated: \$4.3 billion Total Estimated Value: \$15 billion Number of firms on Contract: 217

Small business contract dollars: \$4.3 billion WOSB on contract receiving task orders: n/a

WOSB contract dollars: n/a Contract Access Fee: 0.75% Primary NAICS: 5415

STARS II (GSA)

FY2011-FY2021

http://www.gsa.gov/portal/content/105243#

8(a) STARS II provides flexible access to customized IT solutions including custom computer programming services, computer systems design services, computer facilities management services; and other computer related services.

Small business set-aside contract

Track: 8(a)

Dollars Obligated: \$4 billion Total Estimated Value: \$10 billion Number of firms on Contract: 581

Small business contract dollars: \$4 billion WOSB on contract receiving task orders: 114 WOSB contract dollars: \$526.1 million

Contract Access Fee: 0.75%

Primary NAICS: 5415



TOTAL TECHNOLOGY NEXT GENERATION (T4NG) (VA)

FY2016- FY2026

https://www.voa.va.gov/

T4NG is expected to deliver contractor-provided information technology service solutions, including technical support. program management, strategy planning, and systems/software engineering. The T4NG contract supports the Department of Veterans Affairs MyVA transformation effort.

Single contact with large and small businesses

Track: all small business

Dollars Obligated: \$61.6 million Total Estimated Value: \$22.3 billion

Number of firms on Contract: 21 (10 SDVOSB, 2 SB, 9 large business)

Small business contract dollars: \$26.3 million

WOSB on contract: 2

WOSB on contract receiving task orders: 1 WOSB contract dollars: \$13.1 million

Contract Access Fee: n/a Primary NAICS: 5415

VETS (GSA)

FY2007-FY2017

http://www.gsa.gov/portal/content/104996

Veterans Technology Services (VETS), a small business set-aside GWAC, provides flexible access to customized IT solutions from a qualified, diverse pool of service-disabled, veteranowned small businesses.

Small business set-aside contract

Track: SDVOSB

Dollars Obligated: \$1.6 billion Total Estimated Value: \$5 billion Number of firms on Contract: 31

Small business contract dollars: \$1.6 billion WOSB on contract receiving task orders: 3 WOSB contract dollars: \$56.3 million

Contract Access Fee: 0.75%

Primary NAICS: 5415



VETS II (GSA)

FY2017- FY2027

http://www.gsa.gov/portal/content/104996

Veterans Technology Services II (VETS), is expected to be an SDVOSB set-aside GWAC, providing flexible access to customized IT solutions from a qualified and diverse pool of service-disabled, veteran-owned small businesses.

Small business set-aside contract

Track: SDVOSB

Dollars Obligated: n/a

Total Estimated Value: \$5 billion Number of firms on Contract: n/a Small business contract dollars: n/a

WOSB on contract receiving task orders: n/a

WOSB contract dollars: n/a Contract Access Fee: 0.75% Primary NAICS: 5415



Appendix 2: Women-Owned Small Business Procurement Program Chronology

12/21/2000	Enactment of P.L. 106-554, the SBA Reauthorization Act of 2000 including Section 811, adds Section 8(m), the Women Owned Small Business (WOSB) Procurement Program, to the Small Business Act			
9/2001	SBA completes a study identifying industries under-represented by women- owned small businesses			
3/2005	The National Academy of Sciences (NAS) issues an independent evaluation of SBA's study of underrepresented industries, and finds the SBA study to be insufficient			
10/2005	SBA issues a solicitation seeking a contractor to perform a revised study in accordance with the NAS report			
2/2006	SBA awards a contract to Kauffman-Rand Institute for Entrepreneurship Public Policy (RAND) to complete a revised study of the availability and utilization of women-owned business in federal prime contracting			
6/16/2006	SBA issues a proposed rule implementing the WOSB Program			
4/2007	RAND completes the revised study			
12/27/2007	SBA issues a revised proposed rule to implement the WOSB Program			
2/28/2008	SBA reopens comment period for the 12/27/2007 revised proposed rule to make technical corrections			
10/1/2008	SBA seeks comments on data used to asses under representation of WOSBs in federal contracting			
10/1/2008	SBA issues final rule on WOSB Federal Contract Assistance Procedures			
10/16/2008	SBA issues corrected final rule on WOSB Federal Contract Assistance Procedures			
1/12/2009	SBA reopens comment period on the data used for the assessment of under- represented industries			
3/4/2010	SBA withdraws prior proposed rule published in October 2008, and issues new proposed rules			
10/7/2010	SBA issues final rule on WOSB Federal Contract Program, effective February 4, 2011			
2/4/2011	WOSB Federal Contract Program begins			



1/2/2013	Enactment of P.L. 112-239, the National Defense Authorization Act for fiscal year 2012, includes Section 1697, which removed dollar limitations on the size of contracts women are eligible to receive under the WOSB Federal Contract Program
5/7/2013	SBA issues interim final rule removing dollar limitations in accordance with P.L. 112-239
12/19/2014	Enactment of P.L. 113-291, the National Defense Authorization Act for fiscal year 2015, which includes section 825, requiring a new study of industries by January, 2016, authorizing sole source awards, and requiring advanced certification
5/1/2015	SBA issues a proposed rule implementing WOSB sole source authority
9/14/15	SBA issues final rule implementing WOSB sole source authority
12/18/2015	SBA issues Advanced Notice of Proposed Rulemaking on WOSB Certification
12/30/2015	SBA sends Congress a new report on WOSB underrepresentation by NAICS code
2/20/2016	SBA announces the federal government has achieved the five percent WOSB goal for the first time
03/3/2016	SBA issues a WOSB Program update in the Federal Register, announcing new WOSB Program NAICS codes effective immediately, based on the 12/30/2015 report



Appendix 3: Overview of "Tracks" on MACs

The below table includes the list of socio-economic tracks on the MACs reviewed (contracts appear in sequential order):

Contract	Total Est.	SDVOSB	HUBZone	8(a)	WOSB
	Value				
STARS	\$15 billion			X	
SEWP IV	\$5.6 billion	X		X	
VETS	\$5 billion	X			
ENCORE II	\$12.2 billion	X	X		X
STARS II	\$10 billion			X	
CIO SP3-SB	\$20 billion	X	X	X	X
EAGLE II	\$22 billion	X	X	X	
SEWP V	\$20 billion	X	X		
OS3	\$1.25 billion	X	X		
T4NG	\$22.3 billion	X			
Encore III	\$17.5 billion	X	X		X
VETS II	\$5 billion	X			





ABOUT WIPP The Voice for Women in Business in our Nation's Capital, Women Impacting Public Policy, Inc. (WIPP) is a national nonpartisan public policy organization that advocates for and on behalf of women business owners in the legislative processes of our nation, creating economic opportunities and building bridges and alliances to other small business organizations. Through WIPP, our collective voice makes a powerful impact on Capitol Hill and with the Administration.



ABOUT NEXTWIN NextWin Services is a consulting firm specializing in federal government contracting providing support to firms and organizations engaged in procurement and procurement policy. Services provided include business development and business intelligence, data analysis and trend recognition, as well as strategic advisory consulting.

