USAID PROCUREMENT EXECUTIVE

PROCUREMENT EXECUTIVE’S BULLETIN NO. 2022-01

SUBJECT: Including Grants Under Contract (GUCs) in Task Orders (TOs) under GSA’s OASIS vehicles

1. **Scope:** This Bulletin applies only to USAID Contracting Officers (COs) who have the Delegation of Procurement Authority (DPA) as Ordering Contracting Officer (OCO) for Task Orders under GSA’s Best-in-Class OASIS contract vehicles.

2. **Purpose:** The purpose of the PEB is to inform COs of the limited use of Grants-under Contracts (GUCs) in Task Orders under GSA’s Best-in-Class OASIS contract vehicles.

3. **Responsibilities and Requirements:** USAID COs must ensure that USAID policy and procedures for approving the use of GUCs, as stated in Automated Directives System (ADS) 302 USAID Direct Contracting, are met before including GUCs in an OASIS TO. Additionally, the specific requirements in ADS 302 must be incorporated into the TOs. ADS sections 302.3.4.13 and 302.3.5.6 are the specific sections containing USAID GUC policies and required procedures. Note that GUCs are not authorized under any other GSA mechanisms.

4. **Discussion:** GSA has determined that Task Orders awarded under their Best-in-Class OASIS contract vehicles may include GUCs only in accordance with the policies, procedures, and approval requirements provided in ADS 302 as well as in compliance with applicable federal regulations and authorities. See the attached letter from GSA stating these conditions.

5. **Background:** For several years, USAID has been in discussions with GSA regarding whether GUCs may be included in task orders under GSA Schedules (also referred to as Multiple Award Schedules (MAS) and Federal Supply Schedules). While GUCs are a mechanism specific to USAID, GSA says that their OASIS contract vehicles, unlike the Schedules, were specifically designed “to be very flexible to allow our customer agencies to meet their mission requirements.” The attached letter confirms that this flexibility applies to including GUCs in OASIS TOs.

6. **Inquiries:** Questions may be addressed to Brooke Hopper bhopper@usaid.gov

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7. **Effective Date:** This Bulletin is effective immediately and will remain in effect until canceled by the Senior Procurement Executive.

ATTACHMENT: [GSA Letter (Meadema/Walther) dated January 6, 2022](#)