GSA Acquisition Policy Federal Advisory Committee (GAP FAC)

RECOMMENDATIONS 2023-1

Spring 2023

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LETTER OF TRANSMITTAL

GAP FAC

General Services Administration (GSA) Acquisition Policy Federal Advisory Committee

May 19, 2023

The Honorable Robin Carnahan
Administrator
General Services Administration
1800 F St. NW
Washington, D.C. 20405

Dear Administrator Carnahan:

On behalf of the General Services Administration (GSA) Acquisition Policy Federal Advisory Committee (GAP FAC), we are pleased to present the Committee's initial recommendations. As you know, the GAP FAC's charter established the Committee to advise GSA on how the agency can use its acquisition tools and authorities to target the highest priority acquisition challenges. Consistent with our charter, we initially focus on embedding climate and sustainability considerations in federal acquisitions.

Our recommendations will better enable the federal government to tap into innovative and efficient products and services, spur economic growth and job creation, and protect our environment.

Since standing up last fall, GAP FAC has embarked on an aggressive schedule to deliver this first set of recommendations. We have held three full committee public meetings, and each subcommittee has held nine public meetings. In total, GAP FAC has heard from 48 presenters at these public meetings who have informed the Committee on climate and sustainability efforts at the federal, state and local levels of government and in the private sector.

The Committee's deliberations have been guided by the vision set out in the mission statements crafted by each subcommittee, and the GAP FAC's initial recommendations span the scope of all three subcommittees.

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Acquisition Workforce:

Mission: To empower and equip the federal acquisition workforce to prioritize environmental outcomes and promote sustainability throughout the acquisition lifecycle.

Recommendations:

1: Implement a change acceleration strategy

2: Make sustainability a core, foundational capability across the federal acquisition workforce

3: Create acquisition sustainability experts through a new sustainability certification

Industry Partnerships:

Mission: To identify, engage and equip a broader and more diverse supplier base to achieve the government's goals of sustainability, environmental justice, economic equity, and a resilient domestic supply chain. Efforts will center towards small, midsize, underutilized, underrepresented businesses as well as innovative and new entrants.

Recommendations:

4: Identify, engage and onboard innovative new entrants

5: Sponsor a maturity model for embedding sustainability and climate risk management

Policy and Practice:

Mission: To recommend actionable changes to GSA procurement policies and practices that encourage innovation and streamline the acquisition process to accelerate the demand for and utilization of goods and services from a diverse supplier base to achieve measurable progress on climate and sustainability goals.

Recommendation:

6: Reduce single-use plastics and packaging

A full description of these six overarching recommendations adopted by the Committee on May 4, 2023 is attached, with appendices containing supporting materials.

In conducting discovery that has led to these initial six recommendations, the Committee has been impressed with ongoing initiatives at GSA and elsewhere across the government to incorporate sustainability and climate considerations in federal

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procurement. While each of our recommendations will require sustained attention to be successful, GSA should be able to build on existing efforts to launch implementation of each recommendation.

We also want to extend profound gratitude to GSA for support in this effort, starting with the vision laid out for the Committee by you, Associate Administrator Krystal Brumfield, and Senior Procurement Executive Jeff Koses. The Designated Federal Officer team of Boris Arratia and Stephanie Hardison has provided superb organizational support and insight into acquisition activities within GSA and across the federal government. We are also appreciative of the expertise on the Federal Advisory Committee Act housed within GSA. The Committee could not have gotten so far so fast without this outstanding expertise and support from GSA.

The GAP FAC looks forward to further developing these recommendations and their objectives, as needed by GSA, and to helping to develop performance metrics to assess success. And as discussed at our May 4 meeting, we are eager to move on to identifying a next round of recommendations.

Sincerely,

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Chair, GSA Acquisition Policy federal Advisory Committee

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EXECUTIVE SUMMARY

The General Services Administration (GSA) Acquisition Policy Federal Advisory Committee (GAP FAC) serves as an advisory body to GSA's Administrator on how GSA can use its acquisition tools and authorities to target the highest priority federal acquisition challenges. The GAP FAC advises the GSA's Administrator on emerging acquisition issues, challenges, and opportunities to support its role as America's buyer.

This summary outlines the recommendations put forth by the GAP FAC on May 4, 2023 to support GSA in its mission to create a modern, accessible, and streamlined acquisition ecosystem. The GAP FAC was chartered in July 2022, with its initial focus on driving regulatory, policy, and process changes required to embed climate and sustainability considerations in federal acquisition, in line with Executive Order 14057: *Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability*.

The Committee's deliberations have been guided by the vision set out by our three subcommittees: Acquisition Workforce, Industry Partnerships, and Policy and Practice. The recommendation presented are summarized as follows:

1. **Change Acceleration Strategy:** Establish a strategy to accelerate organizational change within the acquisition workforce by communicating shared expectations, creating a sense of urgency, building a guiding coalition, and fostering a common mission and vision.
2. **Sustainability as a Core Capability:** Make sustainability a foundational core competency for the acquisition workforce in the Federal Acquisition Certification in Contracting (FAC-C) professional requirements.
3. **Sustainability Acquisition Certification Program:** Create a team of sustainability experts through a new GSA-led Sustainability Acquisition Certification program. This program will utilize a cohort-based approach, assess the current state and gaps to create a competency framework and provide real-world experiential learning.
4. **Fast-tracking New Entrants:** Identify, engage and onboard new entrants into the federal marketplace through targeted procurement initiatives. This will accelerate the availability of sustainable alternatives to federal agencies.
5. **Maturity Model for Sustainability:** Sponsor a maturity model that enables the embedding of sustainability and climate risk mitigation in federal acquisition. A maturity model will equip the federal supplier base with accurate and actionable information, proven methods, standard terminology, and consistent educational tools around federal acquisition requirements for sustainability.
6. **Reducing Single-use plastics and packaging:** Adopt a rule to reduce use of single-use plastics and packaging; implement pilots promoting environmentally friendly alternatives.

Acquisition Workforce: Initial recommendations related to the acquisition workforce focus on identifying the essential pathways needed to make environmental and sustainability considerations a core competency in federal acquisition.

Recommendation 1: Implement a change acceleration strategy. To accelerate organizational change within the acquisition workforce, GSA should establish an overall change management strategy which communicates shared expectations, creates a sense of urgency, builds a guiding coalition and creates a common mission and vision. GSA, starting with the Administrator and other senior leaders, has already done much to establish a sense of urgency and create a vision. As efforts related to climate and sustainability mature, a change management strategy will require active engagement with the acquisition workforce to help them understand why change is needed. GSA's vision should be communicated clearly and often across the agency. Other key elements of a change acceleration strategy include: building a coalition of champions within the agency who will inspire and empower the acquisition workforce; upskilling the acquisition workforce; tracking and communicating initiatives and success; and reinforcing organizational change through performance and recognition structures.

Recommendation 2: Make sustainability a core, foundational capability across the acquisition workforce. Training and development of acquisition professionals are critical to the success of advancing sustainability throughout the acquisition lifecycle. The committee recommends three key actions to create a core, foundational sustainability program:

(a) Embed sustainability into Federal Acquisition Certification in Contracting (FAC-C) modernization, moving sustainability from being a special skill outside the foundational training of the acquisition workforce to become a core competency within the new professional requirements. In doing so, GSA will be able to leverage efforts already underway to create a new lifelong learning model through modernization of FAC-C, which will better engage professionals and allow them to keep pace with rapid changes in the sustainability landscape. We also recommend, as part of this new foundational training, that GSA consider creating a centralized website for all sustainability training across the government, which today is located across multiple locations and agencies.

(b) Curate learning to be relevant to acquisition roles. Feedback provided to the committee from frontline acquisition professionals suggests that sustainability training is often abstract and not tied to day-to-day activities. We recommend that GSA curate core sustainability to acquisition roles, recognizing that roles and responsibilities vary across the workforce and the acquisition lifecycle. We also recommend that GSA focus early efforts on launching core training to program managers and contract officers, especially to embed sustainability considerations in the earliest acquisition planning stages.

(c) Leverage third-party training. Acquisition professionals have shared with the

Committee that they sometimes turn to training from third parties (either nonprofit- or industry-sponsored) to keep pace with the rapidly changing landscape of sustainability knowledge and to tie training more specifically to their role. We recommend that GSA leverage and fund expert third-party training. GSA should create a curated and approved list of third-party sustainability training to ensure the workforce receives quality training from best-in-class organizations.

Recommendation 3: Create acquisition sustainability experts through a new sustainability certification. We recommend GSA, in addition to establishing core sustainability training, create a team of sustainability experts who will be trained and certified through a new GSA-led Sustainability Acquisition Certification program. These highly trained experts can be deployed to support peer-to-peer engagement across teams and therefore will promote sustainability across all stages of the acquisition lifecycle. We recommend GSA model a new Sustainability Acquisition Certification program on the successful IT Acquisition Certification (ITAC) program, with three key components:

(a) Build a cohort-based certification program. Skills and training required will differ across the acquisition lifecycle and will vary across types of procurement. The first step in building a certification program will be to ensure that sustainability certification is aligned to distinct roles, purchasing experience and needed outcomes.

(b) Assess the current state and gaps to create a competency framework. In building the ITAC, GSA established a model that prioritized competencies that are distinct to IT buying, including competencies not in the existing FAC-C model. We suggest that GSA take a similar approach with sustainability, beginning with a clear understanding of the competencies required for the acquisition workforce to apply sustainability best practices, the gaps in those competencies, and a curriculum that closes the gaps.

(c) Provide real-world, experiential learning. Frontline acquisition professionals we have spoken to – as well as senior officials responsible for acquisition training – have emphasized the importance of hands-on, experiential learning to facilitate specialized training. Individuals learn by doing, discovering, reflecting and applying, rather than training almost exclusively with instructor-centered experiences. Experiential learning experiences will better equip acquisition professionals to solve real-world problems.

Industry Partnerships: The Industry Partnerships subcommittee has identified two initial priorities for improved industry engagement: first, broadening the pool of viable suppliers; and, second, focusing on metrics, motivations and methods to validate meaningful progress, inspire action beyond mere compliance, and share lessons learned and best practices across the federal supplier base. The Committee's initial recommendations in this area are:

Recommendation 4: Identify, engage and onboard new entrants. Many companies specializing in leading edge sustainable products and services may have little to no experience working with the federal government. The Committee recommends that GSA leverage, develop and deploy targeted procurement initiatives to fast track new entrants into the federal marketplace to accelerate the climate/sustainability curve in federal acquisitions. GSA already has a variety of methods for interacting with industry and educating potential vendors, both as part of GSA's own operations and in partnership with other agencies, including SBA and EPA. Another promising model is GSA's new memorandum of understanding with the Department of Defense, aimed at using DOD's information on performance and pricing to streamline the acquisition process and make sustainable alternatives more readily available to federal agencies. We recommend that GSA conduct a focused survey of mechanisms that may be used to deploy targeted efforts for expanding the supplier base by identifying and attracting new entrants.

Recommendation 5: Sponsor a maturity model for embedding sustainability and climate risk mitigation. Awareness, capabilities and knowledge in the vendor community around federal acquisition requirements for sustainability and climate risk are not universally understood, nor are the pathways to progress clear. The government needs a mechanism to quickly increase knowledge, competencies and commitment across the federal supplier base, including by reaching small and innovative new entrants. The Committee therefore recommends that GSA create, deploy and support an industry-facing maturity model which will help suppliers drive, and be compliant with, delivery of sustainable goods and services and why and how to mitigate climate risk in their own businesses. There are many examples of maturity models across the federal government, including the NIST Cybersecurity Framework. A maturity model will equip the massive federal supplier base with accurate and actionable information, proven methods, standard terminology, and consistent educational tools to drive acknowledgement and awareness. The maturity model will also establish consistent metrics for measuring progress and will create a mechanism for updating information, regulations and best practices over time. GSA also might want to consider developing the foundation of a maturity model through a pilot focused on a selected common spend category.

Policy and Practice: The Committee's initial recommendation in the policy and practice area focuses on reducing the government's reliance on, and consumption and use of, single-use plastics that are used and then immediately disposed of. Last year, GSA began an advance notice of proposed rulemaking to seek public feedback regarding use of plastic contained in bulk packaging and shipping, as well as other single-use plastics for which the agency contracts.

Recommendation 6: Reduce single-use plastics and packaging; The Committee recommends that GSA promptly promulgate a single-use packaging rule. The Committee also recommends a series of pilots, including facility-specific pilots, that GSA could undertake to demonstrate the viability of strategies to mitigate single-use plastic and packaging waste. These materials are used for a very short period of time and often involve redundant packaging that is not necessary for the product being shipped. In addition, GSA and other agencies in GSA owned or leased facilities have to pay for disposal or recycling of such materials. Many single-use plastics are difficult to recycle or compost and end up in landfills, often located in disadvantaged communities. The Committee, in a detailed roadmap, suggests strategies organized by: food services/consumer goods and delivery/packaging materials. Areas of emphasis include: context evaluation and roadmap development; reduction; reuse; recyclability and compostable materials.

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ACKNOWLEDGMENTS

The GSA Acquisition Policy Federal Advisory Committee would like to express our heartfelt gratitude and appreciation to all the individuals who have contributed their time, effort, and expertise to the success of this Committee. We would like to express our deep appreciation to Designated Federal Officers Boris Arratia and Stephanie Hardison for their exceptional leadership and to the support team, David Cochennic, Skylar Holloway, and Adam Sheldrick. We are also deeply grateful to the GSA members, presenters, speakers, and panelists who have generously contributed and shared their knowledge and expertise. Thank you all for your unwavering support and for being a part of a remarkable journey.

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RECOMMENDATIONS

ACQUISITION WORKFORCE

In an era of increasing environmental concerns, the acquisition workforce recommendations stand as powerful tools to empower and equip the federal acquisition workforce to prioritize environmental outcomes and promote sustainability throughout the acquisition lifecycle. We have identified two initial priority areas for the acquisition workforce, with the first focused on identifying the essential pathways needed to make environmental and sustainability considerations a core competency in federal acquisition. The second priority is to identify the critical levers needed to empower the acquisition workforce to prioritize environmental outcomes and promote sustainability with the least amount of effort.

For this first set of recommendations, the focus is on recommendations specific to Priority 1. The Committee offers three initial recommendations, which are elaborated in the sections that follow: 1) implement a change acceleration strategy, 2) make sustainability a core, foundational capability across the acquisition workforce, and 3) create acquisition sustainability experts.

PRIORITY: Identifying the essential pathways needed to make environmental and sustainability considerations a core competency in federal acquisition.

Recommendation 1: Implement a Change Acceleration Strategy

Embedding environmental and sustainability considerations across the federal acquisition lifecycle will involve organizational change. As change is underway, we focus on how to accelerate the pace of change by emphasizing the importance of GSA communicating shared expectations, creating a sense of urgency, building a guiding coalition, and creating a common vision and mission for a desired future state.[1] See Appendix A for an example of a roadmap.

GSA has already begun its change acceleration process by **establishing a sense of urgency and creating a vision**, starting with messaging to the public and GSA employees from the Administrator and senior GSA leaders. GSA has a key role in the National Climate Task Force, formed by Executive Order 14008, which charts progress on administration initiatives and goals focusing on tackling climate change. Other examples of creating a vision include the agency's

[1] The organizational change phase model is based on Hoffman, A. (2019) Note on Climate Change as Organization Change (WDI Publishing); Hoffman, A. (2000) Competitive Environmental Strategy: A Guide to the Changing Business Landscape, (Washington DC: Island Press). The model is adapted from Lewin, K. (1947) Group decision and social change, in T.M. Newcomb & E. L. Hartley (Eds.) *Readings in Social Psychology*. (New York: Holt, Rinehart, & Winston);
Kotter, J. (1995) "Why transformation efforts fail," Harvard Business Review. March-April: 60-67; Spector, B. 2009. Implementing Organizational Change: Theory into Practice 2nd Edition. Prentice Hall.

commitments to net zero operations[2] by 2045 and zero emission vehicle acquisitions for the federal fleet by 2035. Going a step further, the acquisition workforce will need to be actively engaged and clearly understand "why" the change is needed, in addition to their role in achieving those goals. Clarity and frequency of communications encompassing the why, the who, and the how are vital to ensuring that GSA's sense of urgency is maintained and to overcome organizational inertia.

We suggest that this vision be articulated as part of **agency-wide communications** to reinforce the commitment of GSA's executive leadership and obtain buy-in across the acquisition workforce and should communicate GSA's vision for embedding sustainability considerations into federal acquisition and the vision for GSA's overall mission and public value. This vision should be articulated clearly and often and integrated into multiple communications tools throughout the agency. In communicating its overall vision, as recommended by several environmental experts that we heard from, GSA should also establish and **communicate interim goals**, as workers tend to associate interim goals more closely to their day-to-day work tasks.

As part of Phase 1, and based on our discussions with front-line acquisition professionals, we recommend that GSA **form a powerful guiding coalition of champions** to help build momentum both across GSA and across the different functions of the federal acquisition lifecycle. Champions must have significant legitimacy among their peers and have a proven ability to influence others around them. Champions should be able to translate GSA's vision in actions, words and commitments to inspire and empower the acquisition workforce and also cultivate and share success stories through peer to peer learning. These activities complement the acquisition workforce's formal training (see Recommendations #2, #3). One approach to consider, which was punctuated by our discussions with GSA front-line professionals, relates to GSA's Sustainability Council and establishing Sustainability Specialists:

- Reinvigorate GSA's National Sustainability Council – composed of individuals from each region. Select members based on their expertise, but also their influence within the regions.

- Create Regional Sustainability Councils – composed of individuals within the region who can accelerate change within the region. Select members based on their expertise, but also their degree of influence within each region. Encourage council members to think innovatively about creative ways to foster sustainability success.

- Establish Sustainability Specialists – Specialists should be tasked with solving high-priority sustainable acquisition problems within each region (or across regions). They

[2] These commitments relate to GSA's building portfolio. Other GSA climate action and sustainability commitments can be found here: https://www.gsa.gov/governmentwide-initiatives/climate-action-and-sustainability#climate.

should engage at the early stages of the acquisition lifecycle process (especially pre-award). This idea connects strongly with Recommendation #3.

In order to **empower the acquisition workforce to act**, GSA should focus on upskilling its workforce with training (see Recommendations #2, #3) and have champions who can lead sustainability initiatives and be a source for answering questions (see above). Other areas of focus relate to creating a centralized repository for sustainability information and tools. This should be a one-stop place for the acquisition professionals to obtain sustainability information related to their day-to-day tasks. This last point, and other ways to accelerate change, will be explored further as part of future recommendations related to Priority 2.

Since visible success builds momentum, GSA should **track and communicate its action initiatives and short-term wins** to show the acquisition workforce that it is making progress towards realizing its vision and mission. These agency-wide achievements must be unambiguous and initially should focus on quick gains (e.g., establishing training, reporting on the numbers of individuals who complete the training, etc. – see Recommendations #2, #3).

Later stages of change acceleration involve the process of institutionalizing the GSA's new changes. **Continued communications** are an important part of this phase. GSA should communicate how its new changes have helped the agency meet its sustainability goal. This point was made especially strongly by the state and local government environmental procurement leaders who we interviewed. Metrics to consider include the percent of contracts that include sustainability criteria, total carbon equivalent reductions related to spend, etc. This internal communication should be just as prominent as the communication efforts during the start of GSA's change acceleration process.

Performance and recognition structures should also reinforce institutional change . For example, the undertaking of specialized training should be favorably reflected in the performance review process. GSA should establish highly publicized regional and national sustainability awards and other recognitions that reward innovation and success. One possible example to follow is the White House's Presidential federal Sustainability Awards, which has 10 award categories that recognize sustainability leadership across the federal government.

Moreover, **managers should be accountable** for reporting on how many of their staff complete the training identified in Recommendations #2 and #3 (below) in addition to achieving other aspects of GSA's environmental and sustainability goals. For higher-level managerial roles, GSA should **align its sustainability acquisition goals with performance reviews**.

Recommendation 2: Make Sustainability A Core, Foundational Capability Across the Acquisition Workforce

Training and development of acquisition professionals are critical to the success of advancing sustainability throughout the acquisition lifecycle. Feedback from frontline acquisition professionals is that sustainability training and development, including basic information and resources, at present is: 1) outside of their core training, 2) not always focused early enough in the acquisition life-cycle, 3) not always relevant to their actual role, and 4) unable to keep pace with the rapid changes in the sustainability landscape. Based on this feedback, and that from acquisition and government sustainability experts, we recommend that sustainability become a core, foundational capability across the acquisition workforce. We recommend three key actions to create a core, foundational sustainability program:

Embed sustainability into FAC-C Modernization

Move sustainability from a special skill outside of the foundational training of the acquisition workforce, to become a core competency within new Federal Acquisition Certification in Contracting (FAC-C) professional requirements. By doing so, GSA will embed sustainability into one of the federal government's foundational certification and training programs, and leverage the work underway by the Office of federal Procurement Policy (OFPP) to create a new lifelong learning model through its FAC-C Modernization program. This addresses key feedback from acquisition professionals, who told us sustainability training and development is treated as a special skill outside of their core training, thus making sustainability knowledge difficult to find.

In addition, a focus on traditional classroom training, prior to FAC-C Modernization, did not reflect the different ways that people learn or want to learn (e.g., highly engaged settings, dynamic role playing, and case study assessments). FAC-C Modernization's current focus on modern learning, training agility, and continuous professional growth will better engage professionals and allow them to keep pace with the rapid changes in the sustainability landscape. We also recommend, as part of this new foundational training, that GSA consider creating a centralized website for acquisition workforce professionals to access all the current sustainability training across the federal government, which today is located across multiple locations and agencies.

Curate Learning to Be Relevant to Acquisition Roles

Ensure that core sustainability training is curated to acquisition roles, recognizing that roles and responsibilities vary across the workforce and the acquisition lifecycle. We heard from GSA's frontline acquisition professionals that sustainability training and development is not always relevant to their day-to-day role and activities. One contracting officer shared, "formal training is so abstract and removed from what I do each day it's almost entirely irrelevant." To empower

learners to develop practical skills that can be applied to their day-to-day jobs, curated learning should be tied to their roles. In considering where GSA should first initiate its training, we recommend that GSA focus its early efforts on launching core training specific to Program Managers and Contracting Officers, and especially those who impact the acquisition in the earliest planning stages. The former Chief Procurement Officer for King County, WA, who launched the County's procurement sustainability program, shared that it was critical to "get as far upstream in the acquisition process as possible," by involving Program Managers early in the acquisition cycle to build sustainability considerations into specifications.

Leverage Industry Expertise

Empower professionals to leverage third-party training to further their core sustainability training. Acquisition professionals told us they sometimes leverage third-party training (either nonprofit or industry sponsored) to keep pace with the rapidly changing landscape of sustainability knowledge and to secure training tied more specifically to their role. One GSA program manager within the facilities leasing team reported that he leverages sustainability training offered by the U.S. Green Building Council to ensure he is up to date in the application of sustainability best practices related to buildings. While his unit pays for his training, he pays out of pocket for the Leadership in Energy and Environmental Design (LEED) certification exam. We recommend that GSA leverage and fund expert, third-party training to ensure that the acquisition workforce receives the most up-to-date expert training. We recommend as part of this effort that GSA create a curated and approved list of third-party sustainability training to ensure that the workforce receives quality training from best-in-class industry organizations.

Recommendation 3: Create Acquisition Sustainability Experts through a New Sustainability Certification

While we recommend the acquisition workforce be upskilled through core sustainability training, we also recommend GSA create a team of sustainability experts, who will be trained and certified through a new GSA-led Sustainability Acquisition Certification program. By embracing practices to create certified sustainability acquisition experts, GSA will benefit from highly trained acquisition experts, or coaches, who can be deployed to support peer-to-peer engagement across their own and other acquisition teams. As a result, GSA can accelerate the promotion of sustainability best practices across stages of the acquisition lifecycle and amplify the overall success of sustainable acquisition outcomes. Because of its proven success, we recommend GSA model its Sustainability Acquisition Certification program after its IT Acquisition Certification (ITAC) program. ITAC represents GSA's first user-driven, competency based, metric informed certification, and we believe is an ideal model on which to base the new proposed Sustainability

Certification. We recommend three key components to building a new team of certified, sustainability experts modeled after GSA's ITAC program:

Build a Cohort-Based Certification Program

The skills and training required to successfully implement environmental and sustainability considerations across the acquisition lifecycle will vary across different types of procurement. The first step in building a certification program is to ensure that sustainability certification is aligned to distinct roles, purchasing experience, and desired outcomes. Doing so will also further help to identify groups of acquisition professionals who share similar acquisition work experiences or focus, and thus tailor sustainability certifications to these professionals. For example, the Defense Acquisition University (DAU) within the Department of Defense has begun to offer smaller, more job-specific credentials to move beyond a one-size fits all framework. This theme of more tailored and specialized training was reiterated by multiple acquisition experts and frontline professionals, who recommended that a sustainability credential should be differentiated by job-specific functions and different purchasing experiences to ensure relevance to their job.

Assess the Current State and Gaps to Create a Competency Framework

In building the ITAC, GSA established a model that prioritized competencies that are unique and distinct to IT buying, including competencies not in the existing FAC-C model. GSA categorized its competency model into three areas covering all phases of the acquisition lifecycle: professional, foundational technical, and lifecycle technical. Example competencies that GSA identified as being essential to each of these three areas included critical-thinking and decision-making, business and technical acumen, and negotiation skills. GSA then developed an IT skills assessment based on its competency model to identify gaps in existing competencies. GSA used this information to create a framework for the new ITAC program, thus closing the gaps within these key competencies. Using this model as a guide, we recommend that GSA develop a sustainability certification competency model. This model should begin with a clear understanding of the key competencies required for the acquisition workforce to apply sustainability best practices, the gaps in those competencies, and a curriculum that closes those gaps.

Provide Real-World, Experiential Learning

Several frontline acquisition professionals cited the importance of hands-on, experiential learning to facilitate specialized sustainability training. Individuals learn by doing, discovering, reflecting, and applying, rather than training almost exclusively focused on instructor-centered experiences. Through experiential learnings, acquisition professionals will be more equipped to apply their newly honed competencies by responding to and solving real-world acquisition

problems and experiences. Several acquisition professionals suggested that specialized training should be an "intensive experience," over multiple days and weeks, highly engaged, scenario-based, and peer-to-peer.[3]

NEXT STEPS AND FUTURE RECOMMENDATIONS

Structural Changes

As GSA implements its change acceleration model, other important structural changes that will need to be considered involve assessing relevant job descriptions to include expectations about the specialized sustainability training described in Recommendation #2. Additionally, the criteria by which new acquisition professionals are hired may need to reflect new sustainability criteria.

Learning Objectives

Related to Recommendation # 2 - Make Sustainability A Core, Foundational Capability Across the Acquisition Workforce, a next step for GSA is to consider which learning objectives are needed as part of a sustainable acquisition competency. GSA could then assess the learning assets that have already been developed and consider additional needs to meet the goal of creating a "sustainability mindset" in GSA.

Training/Credential Pilot Testing

As a first step to implementing the training outlined in Recommendations #2 and #3, we suggest that GSA pilot the training in a way that includes performance metrics to assess training success. After the pilot testing is completed, GSA should evaluate the training against the rubrics for success, adjust the training (and rubrics) if needed, before implementing the training agency-wide.

Explore Priority 2

In the weeks that follow, the Committee will explore its second priority – to identify the critical levers needed to empower the acquisition workforce to prioritize outcomes and promote sustainability with the least amount of effort. This priority connects directly with Phase 2 of the Change Acceleration recommendation (Recommendation #1). We have already begun investigating these levers, as well as performance metrics and monitoring approaches to assess progress towards realizing GSA's vision to embed sustainability considerations into federal acquisition.

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[3] This could involve a developmental assignment (30-80 hrs) with a pre-built, facilitated, custom, or cross-government experiential learning opportunity that enable the participant to scope and lead a project that develops their skills, furthers the agency's mission, and identifies mentor and project advisor support. Project advisors would be incentivized by receiving continuous learning points (CLPs).

INDUSTRY PARTNERSHIPS

As the urgency to address environmental challenges grows, the Committee has focused on how GSA can best identify, engage and equip a broader and more diverse supplier base to achieve the government's goals of sustainability, environmental justice, economic equity, and a resilient domestic supply chain. Specifically we have centered our efforts towards small, midsize, underutilized, and underrepresented businesses, as well as innovative and new entrants. In exploring and offering recommendations to strengthen government-industry partnerships, the Committee has identified two top priorities for maximizing mission impact. First, recommendations will focus on impactful engagements that address the target market and broaden the pool of viable suppliers. Second, recommendations will focus on metrics, motivations and methods that can be developed and deployed to validate meaningful progress, inspire action beyond mere compliance, and share lessons learned and best practices across the federal supplier base.

The Committee's initial recommendations for industry partnerships specifically target identifying and recruiting new innovative entrants in the supplier base (Recommendation #4), while also equipping the supplier base to drive sustainability and climate risk efforts in federal acquisitions (Recommendation #5).

Recommendation 4: Identify, Engage and Onboard Innovative New Entrants

Through exploration and discovery, the Committee has learned that it is difficult to expand the federal supplier base with innovative new entrants specializing in leading edge sustainable products and services. Many of these companies are not part of the familiar targeted pools and may have little to no experience working with the federal government. This challenge, along with the need for greater climate risk mitigation efforts, signals that expanded and different approaches are necessary.

The Committee recommends that GSA leverage, develop and deploy targeted procurement initiatives under the climate change/sustainability portfolio/umbrella designed to fast track new entrants that can accelerate the current climate progress curve in federal acquisitions. The objective is to identify and expand the participation of small and midsized, innovative firms that can bring game-changing technologies, products or services directly tied to measurable climate change and sustainability progress. Speed and impact are critical to this effort, and we encourage GSA to find creative avenues to take on existing programs and contract vehicles or, if necessary, create new avenues.

Targeted procurement vehicles for innovation are not new to the government. The federal government has a range of procurement and acquisition options available to fast track the purchasing of goods and services from the private sector to address critical needs.

CHALLENGE.GOV, "where innovators are inspired to meet challenges big and small" is an existing mechanism that the Committee strongly encourages GSA to use.[4] By creating a series of challenges to target new and innovative entrants and invite them to help solve some of governments' tougher climate challenges, GSA can send a strong demand signal that there is an important place in the federal supply pool and the government is looking for, and is willing to work with, new entrants.

While our discovery identified challenges, it also revealed that GSA has a variety of methods for interacting with industry and educating potential vendors. GSA continues to identify new and innovative methods for outreach and engagement. The key will be how to best identify, attract and onboard those businesses not yet known to GSA. GSA's efforts include the Green Procurement Compilation (providing information on federal policies impacting greenhouse gasses (GHG) management and other resources on sustainable procurement), the Sustainable Facilities Tool, or SFTool (providing resources on requirements and best practices for sustainability relating to buildings and facility management), and the GSA Environmental Aisle on GSA Advantage (providing a way for federal buyers to more easily identify sustainable goods and services).

GSA has other promising means for interacting with industry on sustainability and climate requirements. Notably, GSA has an Ombudsman, whose responsibilities include fostering healthy relationships with industry and providing plain language explanations of new requirements impacting federal contractors. Another example is GSA Interact, a means of providing forums for the government and industries to form communities of interest around particular topics (although there is not yet a community centered on sustainability).

GSA also has ample opportunity to build on existing partnerships with other federal agencies. The Small Business Administration (SBA) has mature offerings for expanding the supplier pool through engagement, education, and onboarding new small businesses,[5] and at the Environmental Protection Agency (EPA), efforts on innovation in the supplier base relative to sustainability are also underway.[6] The Committee recommends GSA continue its current work under GSA's Federal Acquisition Service (FAS), to harness the power of both these efforts as it develops targeted acquisition strategies for identifying and fast tracking innovative new entrants that support objectives of both inclusivity and innovation.

In another promising initiative, in March 2023, GSA signed a memorandum of understanding (MOU) with the U.S. Department of Defense (DoD) to help expedite bringing environmental innovations into the federal marketplace. GSA will use DoD's Sustainable Technology Evaluation and Demonstration (STED) Program information on product performance and pricing

[4] https://www.challenge.gov/
[5] Industry Partnership Subcommittee Public Meeting Discussion, SBA, February 14, 2023
[6] Industry Partnership Subcommittee Public Meeting Discussion, EPA and FAS, February 1, 2023

to streamline the acquisition process and make sustainable technology alternatives more readily available to federal agencies.[7] This is a great example of partnering, leveraging existing tools, sharing established programs, and creating new avenues for bringing speed and impact to sustainability and climate challenges.

Through our discussions, we also questioned whether the government has fully tapped the potential for innovation that academic institutions can bring to the table. While we have not delved deeply into this avenue, we do believe there is untapped potential for GSA to explore and potentially leverage targeted procurement vehicles to reach academic institutions, particularly Historically Black Colleges and Universities (HBCU).[8]

The Committee also recommends GSA conduct a focused survey of these and other mechanisms to deploy targeted efforts for expanding the supplier base by identifying and attracting innovative new entrants.

Specialized procurement vehicles can present challenges such as perceived lack of competition, lack of transparency, and potentially lack of expertise in evaluating offerors and awarding contracts. Many of these challenges can be addressed by leveraging existing tools/services and implementing coordinating policy requirements for interagency cooperation and transparency.

As GSA builds out this recommendation, the agency can use competitions to support ongoing innovative strategies for climate risk and incentives and credits used to build a strong pipeline. It is important to welcome companies to expand the supplier pool who bring sustainability and climate risk mitigation technologies, products and services. Companies can be given access to pitch their products and services, sharing their company goals in order to gain visibility and exposure to GSA.[9] Creating this opportunity presents a mechanism of intertwining the robust entrepreneurship community in our country with the goods and services needs of our government to advance protecting the planet. Our recommendation is about taking a high-touch approach, making the connections that count to maximize speed and positive impact.

Recommendation 5: Sponsor a Maturity Model for Embedding Sustainability and Climate Risk Mitigation

Through exploration and discovery, we have learned that awareness, knowledge and capabilities around federal acquisition requirements for sustainability and climate risk are not universally understood, nor are the pathways to progress clear. Experts from GSA and across the government have shared concerns regarding the ability of the federal government to effectively

[7] https://www.gsa.gov/about-us/newsroom/news-releases/gsa-dod-sign-mou-to-bring-more-environmental-innovators-to-federal-marketplace-03212023

[8] Industry Partnership Subcommittee Public Meeting Discussion, March 31, 2023

[9] Industry Partnership Subcommittee Public Meeting Discussion, SBA, February 14, 2023

reach the full domain of suppliers, especially the small and innovative new entrants. Sustainability and climate risk expectations continue to increase through executive orders, administrative agendas, and the need to do more for the planet sooner; therefore, it is clear that a mechanism is needed to quickly increase knowledge, competencies, and commitment across the federal supplier base.

The Committee recommends that GSA create, deploy and support an industry-facing maturity model for embedding sustainability and climate risk considerations into federal acquisitions. The faster that more suppliers can better understand how to drive, and be compliant with, delivery of sustainable goods and services and understand why and how to mitigate climate risk in their own businesses, the sooner GSA can meet its goals of maximizing sustainable acquisitions in the shortest period possible, while strengthening the resilience of the government's supply chain.

In many instances the terms maturity model, roadmap, and framework can all describe similar approaches to providing measurable pathways to progress against an established domain, such as cybersecurity or data analytics. To enhance sustainability and reduce climate risk in federal acquisition, the targeted audience for the maturity model is the federal supplier base. The targeted outcome is to increase knowledge and capability of the supplier base to drive more sustainable goods and services and support the government goal of maximizing sustainable acquisitions, while minimizing supply chain climate risk in the shortest amount of time possible.

There are many examples of maturity models deployed across government, with the NIST Cybersecurity Framework (NIST CSF), being one of the most commonly known and widely adopted.[10] In support of this recommendation, the Committee has developed a maturity model white paper, which provides a higher level of detail and several examples and is included as an Appendix B to this report.

For GSA, sponsoring a maturity model for sustainability and climate risk would be an effective method of engaging and equipping the massive federal supplier base with accurate and actionable information, proven methods, standard terminology, and consistent educational tools and resources to drive knowledge and awareness. The maturity model will establish consistent metrics and benchmarks for measuring progress and create a mechanism for updating information, regulations, and best practices over time. Because the maturity model provides a roadmap, businesses can look ahead and advance their efforts to move beyond compliance and into a forward leaning position. Additionally, the use of a maturity model will allow GSA to reach the most suppliers with consistent information, while allowing resources elsewhere to be directed towards more customized efforts and engagements (such as the types of initiatives described in recommendation 4).

[10] GAP FAC Industry Partnership Subcommittee Maturity Model White Paper

In implementing this recommendation, GSA should give careful consideration to defining the different levels or phases of maturity against GSA's goals and objectives and the key attributes or capabilities expected for each level of maturity. The PwC Sustainability curve is a useful framework for consideration.[11]

Partnering can be a powerful accelerant in developing a domain-specific maturity model. GSA might consider partnering with agencies with domain expertise such as EPA. GSA might also consider developing the foundation of the maturity model (phases and capabilities) through a pilot program potentially focused on a selected common spend category. GSA also can choose to leverage third party resources to assist in the development of the maturity model. We recommend GSA conduct Requests for Information (RFI) and market research sessions to develop specific requirements and determine best fits. GSA would benefit from continued discovery from conducting lessons learned discussions with successful large scale maturity model implementations such as the NIST CSF. Also, GSA and the GAP FAC could continue to explore how best to connect the federal supplier base to drive awareness and adoption, as this is a critical element to achieving sustainability and climate goals.

With any large initiative there are challenges. In developing a new maturity model, a focus on the domain and the need to drive progress are critical. GSA will want to avoid the model becoming overly prescriptive and theoretical. GSA also should focus on speed to deploy, ensuring short term wins, and driving acceptance and adoption of the model across the supplier base.

A thoughtful and broadly communicated maturity model will allow GSA to reach the broadest audience of the supplier pool and level set expectations and methods for driving sustainability goals. The incremental or phased approach to using a maturity model will help GSA focus on achievable improvements, build momentum, and ultimately achieve higher levels of maturity overtime.

NEXT STEPS AND FUTURE RECOMMENDATIONS

Moving forward, the Committee would like to work with GSA on further consideration or implementation of these two recommendations as needed. Recommendations for future consideration on industry partnerships include that GSA:

- Sponsor the creation and deployment of an industry networking group directory exchange
- Accelerate capacity building by creating a digital marketplace of best practices
- Leverage the power of the large suppliers to drive expansion and capacity by creating incentives for them to partner with small businesses and new entrants

[11] GAP FAC Industry Partnership Subcommittee Maturity Model White Paper

- Provide a higher level of data access, fidelity and transparency on climate progress
- Develop collaboration/performance metrics for measuring effectiveness of engagement

POLICY AND PRACTICE

Aiming to forge a path towards a sustainable future, the Committee's initial policy and practice recommendation urge GSA to promptly promulgate a single-use plastics and packaging rule. More broadly, the Committee implores GSA to assume an aggressive leadership role in crafting and implementing comprehensive action to reduce the U.S. Government's reliance on, and consumption and use of, single-use plastics (i.e., plastic materials that are used and then immediately disposed of).

Consistent with our mandate to recommend actionable changes that encourage innovation and accelerate the demand and utilization of goods and services to achieve measurable progress on climate and sustainability goals, this recommendation derives from, among other things, the critical need for leadership on this issue, the timeliness of GSA's ongoing efforts to address single-use plastics, a concurrent grass-roots petition, and deep public support for action addressing this pressing issue. In addition to a call to action, the Committee here briefly summarizes the problems with reliance on single-use plastics, offers recommendations, articulates specific areas for policymaking and experimentation, and highlights specific items or topics that require special attention from GSA in crafting any future rule.

The Problems with Single-Use Plastics and Packaging

- Shipping materials are used for very short periods of time and often include redundant packaging that can be reduced without sacrificing protection of the product(s) within the packaging.
- Federal agencies, often housed in GSA-owned buildings, pay for the cost of disposal of product packaging and shipping materials that cannot be recycled. In some cases, federal agencies may pay as well for the recycling of such materials, as part of a contract providing for both disposal and recycling.
- Many single-use plastics and packaging are difficult or impossible to recycle and/or compost and therefore end up in landfills or other materials processing facilities which are often located in or near disadvantaged communities.

Purpose of the Recommendation

- As the largest purchaser in the world, spending close to $650 billion annually on goods and services, the U.S. Government has a tremendous opportunity to reduce single-use plastics and packaging through federal procurement.

- The U.S. government has recognized plastic pollution as a human health and environmental issue and is currently engaged in negotiations on an international legally binding instrument on plastic pollution.

- Approximately 36% of all plastics produced are used in packaging, including single-use plastic products for food and beverage containers, and less than 9% of plastic has been recycled.

- In July 2022, GSA published an advance notice of proposed rulemaking (ANPR) to seek public feedback pertaining to the use of plastic consumed in bulk packaging and shipping, as well as other single-use plastics for which the agency contracts. GSA received over 60,000 comments on the ANPR, with the majority of comments in support of GSA moving forward with a rulemaking. GSA has asked the GAP FAC for its recommendations.

Overview of Current Practices Used by the Federal Government to Procure "Green" Goods and Services:

- Federal purchasers are directed to procure sustainable products and services per Executive Order 14057, OMB Memo 22-06 and the Federal Sustainability Plan. Purchasers must meet all applicable statutory mandates and to the maximum extent practicable, purchase sustainable products and services identified or recommended by EPA.

- EPA's Comprehensive Procurement Guideline (CPG) Program designates recycled-content levels for various products and procuring agencies are required to purchase with the highest recovered material content level practicable.

- In addition to achieving evolving sustainable purchasing requirements, the federal acquisition workforce is historically and currently understaffed and burdened with innumerable (often competing) legislative and regulatory policy mandates, including many social and economic considerations.

Recommendation 6: Reducing Single-use Plastics and Packaging

GSA should move forward with a rulemaking process to reduce single-use plastics and packaging through government procurement. In the short-term, GSA should also develop procurement pilots and facility-specific pilots to demonstrate the viability of strategies to mitigate single-use plastic and packaging waste. In taking action to reduce single-use plastics and packaging, GSA should follow EPA's materials management hierarchy, which ranks management strategies from most to least environmentally preferred - reduce, reuse, then recycle. In doing so, the GSA should take the following considerations into account.

- A set of priority strategies to address single-use plastics and packaging is provided in Appendix C, organized into the following categories:
    - Existing Context Evaluation & Roadmap Development
    - Source Reduction
    - Increase Reuse
    - Improve Recyclability
    - Compostable Materials
- Strategies are organized by the following product categories
    - Food service / consumer goods
    - Delivery / packaging material
- In order to spur action at GSA, the following intervention points for next steps have been provided:
    - Policy development
    - Pilots by contracting officers
    - Facility-specific system pilots

FUTURE CONSIDERATIONS FOR GSA

- Engage with USDA staff working on research & market development programs about latest innovations in biobased materials that support the goals of waste management and BioPreferred procurement.
- Avoid unintended consequences, such as regrettable substitutions.
- When considering actions that relate to product substitution rather than reduction, consider the full lifecycle of the product to ensure the biggest environmental impacts are also being addressed.
- When considering substitutes that are marketed as compostable for single-use plastic packaging and food service items, make sure that such items are accepted in local industrial composting services or programs. Also consider end-of-life implications for items marketed as biodegradable (e.g., their effect on recycling).
- Exemptions should be considered for disaster recovery, disability accommodations, medical use, and personal protective equipment.
- Rising global production and use of plastic is a high-priority global problem with well-documented negative environmental, human health, and climate impacts.

- The Federal Sustainability Plan includes a net-zero procurement goal by 2050 and has also advocated for a global goal of no additional plastic pollution by 2040 in the context of the global negotiation. Moving forward with a proposed rulemaking on single-use plastics and packaging will help achieve each of these goals. Many of the recommendations may be implementable in the near term, independent of the rulemaking process.

- The U.S. government should seize this opportunity to leverage the power of federal procurement spending to reduce the amount of plastic demand – primarily through reduction and reuse – and serve as a catalyst for private industry to address plastic pollution. Reducing landfill disposal and incineration through improved recyclability of single-use plastics and packaging can support sustainability goals where reduction and reuse are not practicable.

Illustrative Examples of Efforts to Reduce Single-Use Plastics

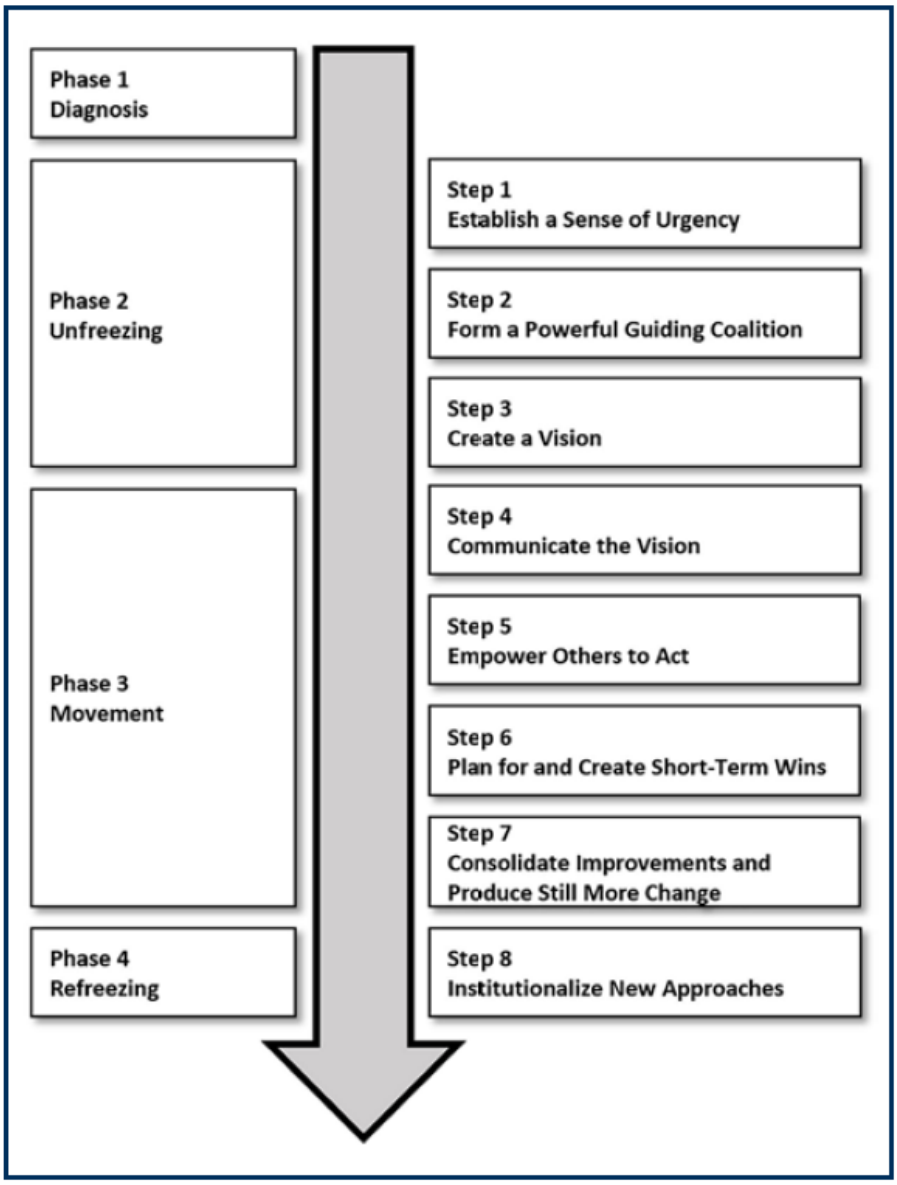
- U.S. Department of the Interior Secretary's Order number 3407 outlines a department-wide approach to reducing plastic pollution with a goal of phasing out single-use plastic products, including at National Parks, by 2032.

- The City and County of San Francisco has implemented policies that restrict the sale or distribution of single-use plastic water bottles on City property, increase the availability of drinking water in public areas, and bar the use of City funds to purchase bottled water.

- Amazon offers incentives to vendors to identify and ship items that can be shipped without additional packaging.

APPENDIX A

Figure 1
A Roadmap for Organizational Change



Source: Hoffman, A. (2000) Competitive Environmental Strategy: A Guide to the Changing Business Landscape, (Washington DC: Island Press); Lewin, K. (1947). "Group decision and social change." In T. M. Newcomb & E. L. Hartley (Eds.) Readings in Social Psychology. (New York: Holt, Rinehart, & Winston); Kotter, J. (1995) "Why transformation efforts fail," Harvard Business Review. March-April: 60-67; Spector, B. (2009). Implementing Organizational Change: Theory into Practice 2nd Edition. Prentice Hall.

APPENDIX B

MATURITY MODEL WHITE PAPER

Introduction

The GSA Acquisition Policy Federal Advisory Committee (GAP FAC) serves as an advisory body to GSA on how it can use its acquisition tools and authorities to target the highest priority Federal acquisition challenges. The initial focus for the GAP FAC will be on driving regulatory, policy, and process changes required to embed climate and sustainability considerations in Federal acquisition and enabling the acquisition workforce to effectively use sustainability as a critical element in the evaluation and source selection process.

The mission of the Industry Partnership Subcommittee (IPS) is to provide the full GAPFAC and in turn GSA with recommendations on how best to identify, engage and equip a broader and more diverse supplier base to achieve the government's goals of sustainability, environmental justice, economic equity, and a resilient domestic supply chain. Specifically we have centered our efforts towards small, midsize, underutilized, underrepresented businesses as well as innovative and new entrants.

The subcommittee has identified two top priorities for maximizing mission impact of recommendations explored and ultimately offered for consideration and implementation.

Priority 1: Engage To Expand
Recommendations focused on impactful engagement that addresses target market and broadens the pool of viable suppliers while curating, compiling and communicating best practices for success.

Priority 2: Measure, Methods and Motivations
Recommendations focusing on ensuring:

- metrics are meaningful, achievable and impactful for the full spectrum of suppliers,
- methods are curated into best practices and shared across the supplier base, and
- incentives are relevant across the supplier pool.

Through exploration and discovery the subcommittee has learned that awareness, knowledge and capabilities around Federal Acquisition Regulation (FAR) requirements for sustainability and climate risk are not universally understood nor are the pathways to progress clear. Additionally, the government (GSA and other agencies) have shared concerns with the

ability to effectively reach the full domain of suppliers, especially the micro, small and innovative new entrant section. As sustainability and climate risk expectations increase through executive orders, administrative agendas and the need to do more for the planet sooner, it is clear that a mechanism is needed to quickly and broadly increase knowledge, competency and commitment across the federal supplier base.

One of the initial recommendations adopted by GAP FAC, as put forward by the Industry Partnerships Subcommittee, is for GSA to sponsor the creation, deployment and ongoing support for an industry partnerships maturity model for embedding sustainability and climate risk considerations into federal acquisitions. The faster more suppliers can better understand how to drive and be compliant with the delivery of sustainable goods and services and understand why and how to mitigate climate risk in their own businesses, the sooner the government can meet its goals of maximizing sustainable acquisitions in the shortest period possible while strengthening the resilience of the supply chain depended on by government and all those it serves.

Recommendation: GSA sponsor, develop and implement an industry-facing maturity model for embedding sustainability and climate risk considerations into federal acquisitions.

Why a maturity model

A maturity model standardizes terminology, requirements, metrics and capability benchmarks against a common domain. It becomes the reference architecture for various and diverse organizations to build consistent disciplines around the domain. For our objective:

- The targeted domain is sustainability and climate risk in federal acquisition
- The targeted audience is the federal supplier base
- The targeted outcome is to increase knowledge and capability of the supplier base so that the government can maximize sustainable acquisitions and minimize supply chain climate risk in the shortest amount of time possible

For GSA, sponsoring a maturity model for sustainability and climate risk, is an effective method of engaging and equipping the massive federal supplier base with accurate and actionable information and methods needed to achieve the agency's goals in driving sustainability and reducing climate risk in the federal supply chain. GSA will be able to:

- Provide standard terminology and requirements across the supplier base
- Provide consistent educational tools and resources to drive knowledge and awareness

- Clearly articulate expectations and requirements and provide resources for organizations to build capabilities addressing these requirements
- Provide consistent metrics and benchmarks for measuring progress
- Create a mechanism for updating information, regulations and best practices over time
- Reach the most suppliers with consistent information, allowing resources to be directed towards customized efforts and engagements.

Maturity models provide consistent guidance on tools, processes and resources for improving maturity in the targeted domain. Maturity models can also provide centralized repositories for standards, regulatory requirements, and best practices. Individual organizations can leverage the published maturity model for:

- benchmarking internal performance and identifying gaps to reach the next level of maturity
- developing action plans for performance improvement or risk reduction
- leveraging consistent metrics for measuring progress against itself and and against the domain standards
- accessing or contributing to industry best practices

Examples of maturity models:

There are many types of maturity models available and in use across business and government today. While names and domain specifics vary, there are consistent elements such as:

- Defined steps of maturity
- Consistent and clear metrics for measurement
- Access to resources and best practices for improvement
- Key capabilities or categories of performance for each step in the maturity process; many common capabilities are organized around people, culture, process, technology and investments

There are several distinct types of maturity models that can be deployed to address different types of domains and business objectives. The chart below highlights some of the key types and elements.

Maturity Model Examples	
Business Capability Models	Capability Maturity Model Integrated - CMMI Institute
Enterprise Risk Management	Risk Maturity Model - RMM
CYBER Security	NIST Cybersecurity Framework - CSF NIST CSF
Data & Analytics	Data management - DMM CMMI
Climate & Sustainability	Sustainability Path (PwC) AIDASH :ECOCHAIN

Table 1

Maturity Models Deployed In Government:

In many instances the terms maturity model, roadmap and framework can all describe similar approaches to providing measurable pathways to progress for organizations or businesses to follow to increase capability against an established domain such as cyber security or data analytics.

Determined from online research the following examples provide information on how and where maturity models and similar tools have been deployed across government.

Agency	Maturity Model Applications	Reference
National Institute of Standards and Technology	Cyber Security	**Cybersecurity Framework | NIST**
Department of Defense	Cyber Security Certification	**CMMC**
Department of Labor	Data Management	**DOL DATA MANAGEMENT**
Social Security Administration	Analytics Center of Excellence	**A2CM2**
Environmental Protection Agency	Identity & Access Management	**Identity Management Roadmap and**

		Maturity Levels
Federal CIO/ACT IAC	IT Spending	IT SPENDING

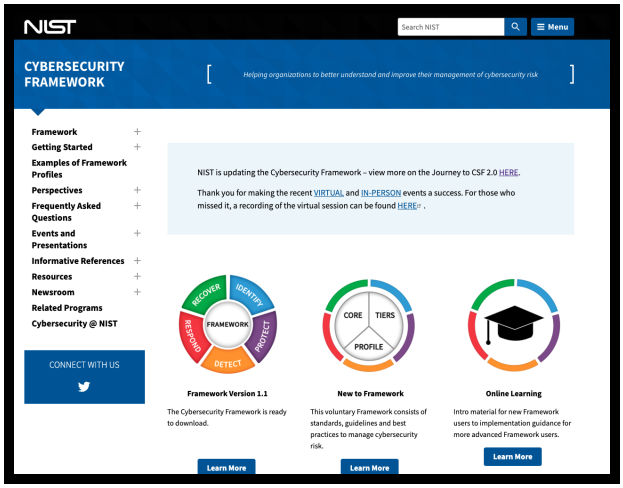
Table 2

NIST CyberSecurity Framework - NIST CSF

In response to Executive Order 13636 the National Institute of Standards and Technology (NIST) was tasked with creating the framework that standardized the approach for organizations to improve their cyber security risk posture. In 2014 cybersecurity was a rapidly evolving domain and national security depended on organizations rapidly developing cybersecurity capabilities and advancing the maturity of the government and its broad base of contractors and suppliers.

"The NIST Cybersecurity Framework is reported to be the most widely adopted security framework in the United States. More than 56% of healthcare organizations that have adopted a security framework have chosen to use the NIST CSF."

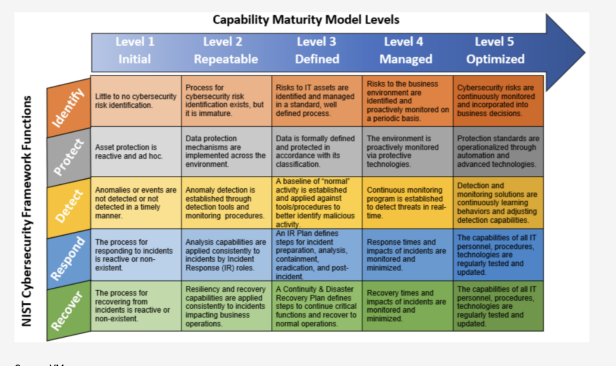
Exhibit: A



Adoption of the NIST CSF is supported through engagement, communications and available resources. The NIST CSF website is an all encompassing repository for organizations to access the most updated information. with ongoing information, resources and communications.

The NIST CSF is a great example of how a maturity model can organize vast complex domain information into an easy to understand actionable plan for driving progress, increasing capability and tracking the maturity of an organization against the domain.

Exhibit: B



In Exhibit B, the benchmarks of domain maturity are articulated across the top of the maturity model and the key capabilities or functions required to master the domain are listed down the side of the model. The heart of the model contains descriptions of what

maturity is for each key capability or function across all levels of maturity. Each cell of maturity includes resources on what the requirement is, how to build that capability through resources and practices, how that maturity level is measured and how measurement is to be conducted (either through self assessment or required third party assessment). The model helps level set all participating in the domain to assess where they are, how they can improve from their current state, and what next steps will be necessary for improving to even higher maturity levels.

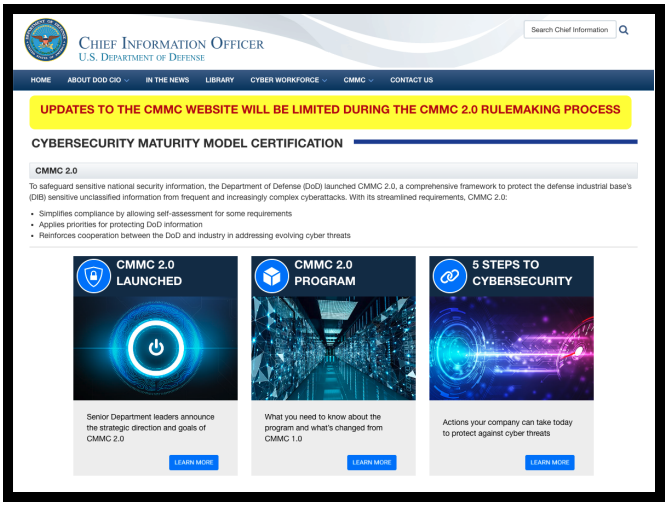
Department of Defence - Cybersecurity Maturity Model Certification CMMC 2.0 - CMMC

The Cybersecurity Maturity Model Certification (CMMC) program is aligned to DoD's information security requirements for Defense Industry Base (DIB) partners. It is designed to enforce protection of sensitive unclassified information that is shared by the Department with its contractors and subcontractors. The program provides the Department increased assurance that contractors and subcontractors are meeting the cybersecurity requirements that apply to acquisition programs and systems that process controlled unclassified information.

The CMMC 2.0 program has three key features that are common across maturity models:

- Tiered Model: requires implementation of progressively advanced measures based on the level of sensitivity of data being shared
- Assessment Requirement: requires assessments based on prescribed audit measure (self or third party) for verifying implementation
- Implementation through Contracts: Once fully implemented certain contracts will require CMMC certification and validation to be successfully awarded

Exhibit: C



Department of Labor Data Management Maturity Model - <u>DOL DATA MANAGEMENT - A2CM2</u>

The Department of Labor (DOL) met requirements of the Federal Data strategy by developing a

Management Maturity are categorized into five key areas of capability:

A. People
B. Technology
C. Analytic
D. Culture
E. Data

Exhibit: D

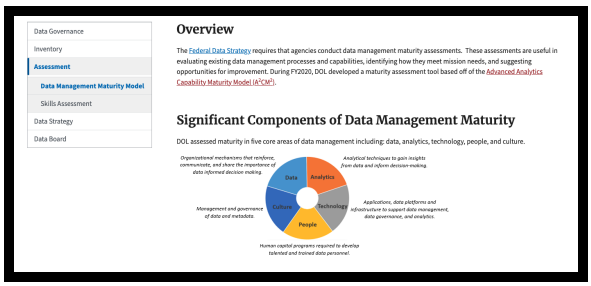
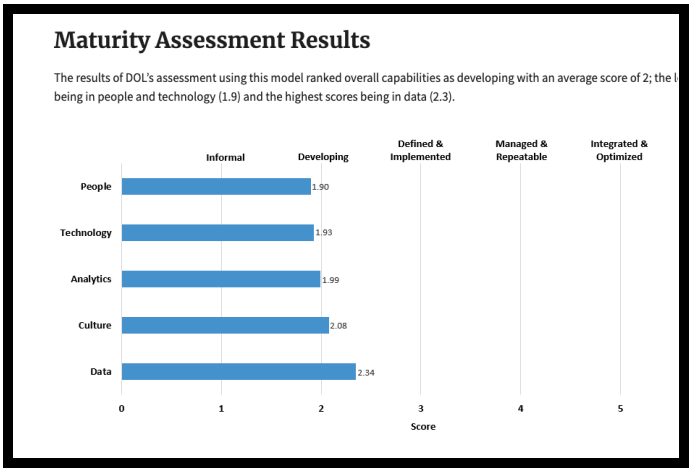


Exhibit: E

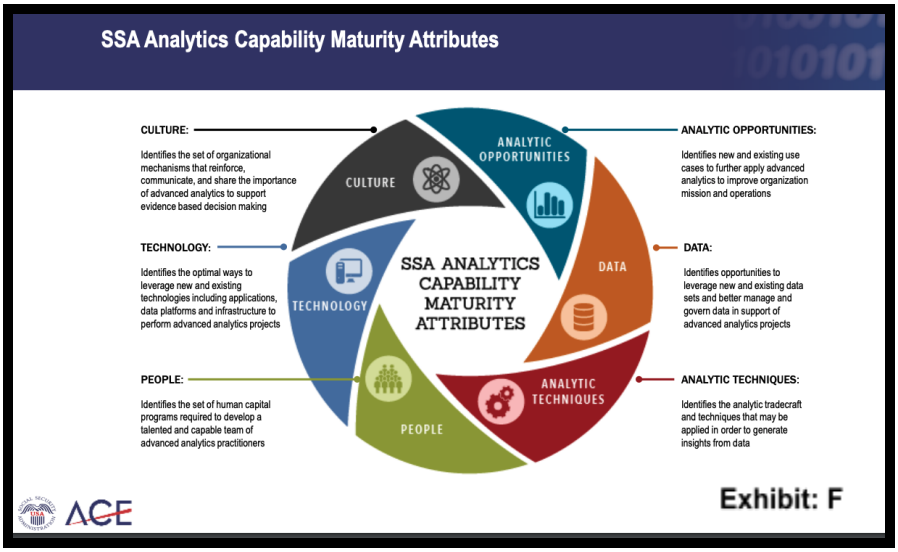
Benchmarks for maturity are defined as:

1. Informal
2. Developing
3. Defined & Implemented
4. Managed & Repeatable
5. Integrated & Optimized



As you can see in exhibit E, the model allows for assessment and measurement of each key capability against the five benchmarks for maturity.

A noteworthy item on this model is that DOL borrowed tenants and nomenclature from the Social Security Administration (SSA) Advanced Analytics Capability Maturity Model A2CM. This is one of the more positive attributes of maturity models, in that there are principles of consistency relative to benchmarks, capabilities, and measurements, but how the model is assembled, the depth and complexity of its content, and how it is visualized and shared can all be customized to the domain and the needs of the organization championing the model and its use.



("Social Security Administration Analytics Center of Excellence")
https://www.ssa.gov/data/data_governance_board/ACE_A2CM2_for%20DGB.pptx.pdf

United States Environmental Protection Agency (EPA)

The Environmental Protection Agency (EPA) leverages a maturity model for Identity and Access Management (ICAM). The model includes a clear roadmap of maturity levels against core components of all ICAM programs. This is another positive output from maturity models, the ability to generate and communicate simple, clear actionable roadmaps to define progress and how to achieve it.

https://www.epa.gov/sites/default/files/2021-01/documents/epa_icam_roadmap-20201029.pdf

Roadmap: Overview

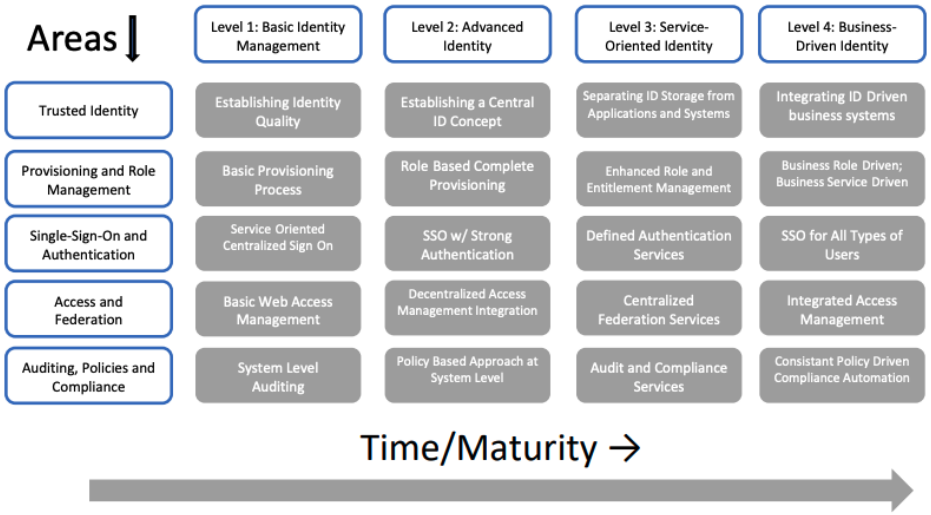
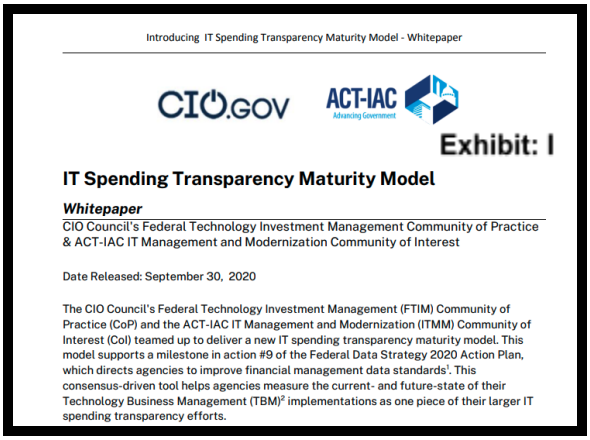


Exhibit: H

CIO Council - Introducing IT Spending Transparency Maturity Model - Whitepaper

Stakeholder Considerations:


Introducing IT Spending Transparency Maturity Model - Whitepaper

CIO.GOV ACT-IAC Advancing Government

Exhibit: I

IT Spending Transparency Maturity Model

Whitepaper

CIO Council's Federal Technology Investment Management Community of Practice & ACT-IAC IT Management and Modernization Community of Interest

Date Released: September 30, 2020

The CIO Council's Federal Technology Investment Management (FTIM) Community of Practice (CoP) and the ACT-IAC IT Management and Modernization (ITMM) Community of Interest (CoI) teamed up to deliver a new IT spending transparency maturity model. This model supports a milestone in action #9 of the Federal Data Strategy 2020 Action Plan, which directs agencies to improve financial management data standards[1]. This consensus-driven tool helps agencies measure the current- and future-state of their Technology Business Management (TBM)[2] implementations as one piece of their larger IT spending transparency efforts.

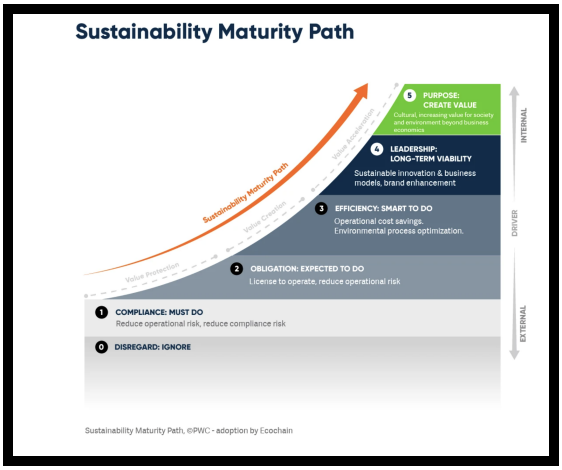
In some instances organizations can partner on the creation of maturity models and roadmaps to drive common desired outcomes. The Federal CIO Council and ACT IAC partnered on the creation of an IT spend maturity model. Partnering can be most useful for emerging domains where core capabilities and levels of maturity may not yet be well defined.

("IT Spending Transparency Maturity Model - Whitepaper")
https://www.cio.gov/assets/files/IT-Spending-Transparency-Maturity-Model-Whitepaper.pdf

Implementation Considerations (Pathways and Challenges)

In sponsoring the creation, deployment and ongoing support for an Industry Partnerships maturity model for embedding sustainability and climate risk considerations into federal acquisitions we offer the following pathway and challenges considerations.

Exhibit: J



Considerations

In building out this recommendation, careful consideration should be given to defining the different levels or phases of maturity against GSA goals and objectives and to the key attributes or capabilities being built out against each level of maturity.

The PwC Sustainability curve is a useful framework for consideration and key attributes for the recommended maturity model might be categorized into:

- Awareness/Knowledge

- Metrics/Measures
- Capability/Compliance
- Transparency/Leadership

While building out this recommendation, careful consideration should be given to defining the different levels or phases of maturity against GSA goals and objectives and the key attributes or capabilities being built out against each level of maturity. The PwC Sustainability curve is a useful framework for consideration and key attributes for the recommended maturity model might be categorized by; awareness/knowledge, metrics/measure, capability/compliance, and transparency/leadership.

Partnering can be a powerful accelerant in developing a domain specific maturity model and GSA might consider partnering with agencies with domain expertise such as EPA. Piloting might also be a good place to start this effort, and GSA might consider developing the foundation of the maturity model (phases and capabilities) through a pilot program, potentially selecting a unique category to focus on. GSA will want to leverage third party resources to assist in the development and deployment of the maturity model.

GSA might consider conducting RFIs and market research sessions to develop specific requirements and determine the best fit. We also recommend GSA continue with discovery from conducting lessons learned discussions with successful large scale maturity model implementations such as NIST CSF. Lastly, GSA and the GAP FAC's Industry Partnerships Subcommittee could continue to explore how best to connect the federal supplier base to drive awareness and adoption as this is a critical element to achieving sustainability and climate goals.

With any large initiative there are challenges. In developing a new maturity model, focus on the domain and the need to drive progress are critical. GAS will want to avoid the model becoming overly prescriptive and theoretical and focus on speed to deploy, ensuring short term wins and driving acceptance and adoption of the model across the supplier base.

Conclusion

A thoughtful, strong architecture and broadly communicated maturity model will allow GSA to reach the broadest audience of the supplier pool and level set expectations and methods for driving sustainability goals. The incremental or phased approach to using a maturity model also helps GSA to focus on achievable improvements, build momentum, and ultimately achieve higher levels of maturity overtime.

APPENDIX C

Reducing Single-use Plastics Roadmap

Existing Context Evaluation & Roadmap Development			
No.	*Category*	*Next step*	*Strategy*
1	Food service / consumer goods AND delivery / packaging material	Policy development	In coordination with EPA, identify existing sustainability standards or ecolabels already being used in federal purchasing that incentivize plastic waste reduction in their certified products
2	Food service / consumer goods AND Delivery / packaging material	Policy development	In coordination with EPA, identify gaps and opportunities for additional standards and ecolabels to address reduction of plastic, as well as reduction of overall material, for packaging with a focus on and/or shipping materials
3	Food service / consumer goods	Policy development	Develop and implement a strategy with numerical goals and timelines to phase out single-use plastic products across GSA. This strategy should be based on current funding, but also include an estimation of funding needed for any new capital costs for further implementation, such as installing dishwashing equipment and water fountains.

Source Reduction			
No.	*Category*	*Next step*	*Strategy*
4	Delivery / packaging material	Pilots by procurement officers	Improve scheduling and bulk ordering processes to consolidate packaging from single vendors or delivery service providers
5	Delivery / packaging material	Pilots by procurement officers	Develop pre-award incentives and/or post-award rewards to suppliers for reducing unnecessary plastic packaging in shipping materials, demonstrated through waste reduction plans or third-party ecolabels
6	Delivery / packaging material	Pilots by procurement officers	Priority evaluation criteria or incentive for delivery vendors that provide dual use packaging, with returns processed with same packaging
7	Food service / consumer goods	Facility specific pilots	Restrict the sale and distribution of single-use plastic water bottles in GSA-owned buildings where clean and safe drinking water is available, similar to the Secretary's Order being implemented by U.S. Department of the Interior
8	Food service / consumer goods	Facility specific pilots	For GSA-operated lodging, replace small containers of bathing products for bulk dispensers.

Increase Reuse			
No.	*Category*	*Next step*	*Strategy*
9	Delivery / packaging material	Pilots by procurement officers	Develop priority evaluation criteria or incentive for delivery vendors to provide reusable shipping materials and reverse logistics, such as collection of delivery packaging
10	Food service / consumer goods	Pilots by procurement officers	Develop priority evaluation criteria or incentive for vendors to reusable and refillable packaging when feasible. For example, concentrated or refillable cleaning products
11	Food service / consumer goods	Facility-specific pilots	Encourage the use of reusable water bottles and beverage cups in GSA-owned buildings by ensuring that clean and safe drinking water is available and creating signage and PR campaigns encouraging refill and reuse
12	Food service / consumer goods	Facility-specific pilots	Require that reusable foodware be available for dine-in meals at cafeterias and other foodservice establishments where feasible. Require or incentivize the provision of reusable cups for large events at GSA-owned buildings
13	Food service / consumer goods	Facility-specific pilots	Replace soda bottle vending machines with automated soda fountains where feasible and encourage the use of reusable cups. Also consider requiring or incentivizing the provision of reusable cups for large events at GSA-owned buildings.
14	Food service / consumer goods	Facility-specific pilots	Conduct pilots at GSA-owned office buildings to reduce single-use foodware by equipping break rooms with dishwashers, cups, and utensils, in addition to drinking water
15	Food service / consumer goods	Facility-specific pilots	For food concessions on GSA property, restrict single-use plastic bags and foodware (cups, plates, utensils, straws). Requiring that reusable foodware be available for dine-in meals is an effective way to reduce single-use foodware consumption and related waste where resources for washing reusable foodware are available. Providing single-use utensils upon request only, rather than automatically, can serve as an incremental step towards a prohibition on such items. Also consider replacing small pouches of condiments in cafeterias with larger refillable containers at stations or tables.

Improve Recycling			
No.	*Category*	*Next step*	*Strategy*
16	Food service / consumer goods AND delivery / packaging material	Pilots by procurement officers	Develop inclusion of priority evaluation criteria or incentives for highly recyclable items (e.g., aluminum single-use beverage packaging, paper shipping materials)
17	Food service / consumer goods	Pilots by procurement officers	Purchase products with maximum levels of recycled-content levels as designated by EPA's CPG program.
18	Food service / consumer goods	Pilots by procurement officers	Eliminate non-recyclable materials, including expanded polystyrene foam foodware and packing materials, where alternatives are readily available

Compostable Materials			
No.	*Category*	*Next step*	*Strategy*
19	Delivery / packaging material AND Food service / consumer goods	Policy development	Conduct mapping exercise for GSA-operated facilities to identify regions with industrial composting service that accept compostable packaging. Industrial composting service is a key determining factor to ensure successful implementation of a compostable materials program
20	Food service	Facility-specific pilot	Conduct pilots in GSA-owned facilities in regions with industrial composting service to replace single-use plastic packaging and flatware for food service with BPI certified compostable products. Pilots should include full life-cycle auditing to ensure appropriate end-of-life disposal for procured compostable products and accurate assessment of environmental benefits. Use of single-use compostable materials should only be considered after source reduction measures have been exhausted.