

GSA Presentation Question and Answers, July 2026

Project Labor Agreements on Large-Scale GSA Construction

New Procedures Under Acquisition Letter [MV-2026-03](#)

Q1. PLA negotiations take time. What happens if an offeror cannot execute a PLA before proposal submission? What terms must be included in the PLA? Does GSA evaluate the PLA for compliance?

A1. GSA does not typically require executed PLAs with proposal submission. Offerors should assess the risk of terms not yet finalized and reflect that risk in the proposed price.

If your proposal is selected for award, the PLA must be executed before construction begins. The contracting officer will not issue the notice to proceed until the executed PLA complies with FAR 22.5 and the contract requirements. If the contractor cannot provide a compliant PLA, the contracting officer will use business judgment to determine next steps.

The Government is not a party to the PLA and does not manage it after award. PLAs are legally binding agreements between the contractor and the signatory unions. Disputes are resolved through arbitration or grievance procedures negotiated by the parties, or through the National Labor Relations Board and federal courts.

Q2. The prior market research process gave contractors who cannot work under a PLA a way to submit feedback and flag competition and pricing impacts. Under the new approach, participation appears to require submitting a PLA price. Is there any way to accommodate contractors who cannot submit a PLA price?

A2. Contracting activities will still conduct standard market research and acquisition planning. Pre-proposal conferences, the GSA forecast, and normal communication with contracting activities remain available to industry.

Q3. Has the new paired proposal procedure been tested to confirm it will reduce protests and litigation time compared to the prior approach?

A3. Multiple solicitations are set for release in the coming weeks that will use the new procedure. GSA is confident this approach is more streamlined than the prior approach and welcomes industry feedback as the procedure is applied to upcoming projects.

Q4. The presentation said non-PLA offers will not be excluded and can compete, but Example 4 showed an offeror disqualified for not submitting a PLA price. When can a non-PLA offer proceed and when can't it?

A4. A PLA price is required on large-scale construction projects; a non-PLA price is optional. Offerors who submit only a non-PLA price have not followed the solicitation and will not be considered for award. Offerors who submit a PLA price may also submit a non-PLA price. If the PLA premium exceeds the cap, the contracting officer may use the offeror's non-PLA price in the best-value trade-off. This structure keeps the procedure consistent with Executive Order 14063 and the OMB memoranda.

Q5. If parts of the technical approach, such as subcontractors, key personnel, staffing, or schedule, would differ between a PLA and non-PLA approach, does the paired proposal procedure require two technical proposals?

A5. No. The offeror submits one technical proposal against one scope of work. The PLA is not a technical evaluation factor. The paired proposal procedure is designed to reduce burden on offerors, not add a second technical submission.

The PLA is only evaluated under the price proposal. If personnel, subcontractors, staffing, or schedule would look different under a PLA versus a non-PLA approach, note those differences briefly in the corresponding price proposal to support the proposed price.