

## General Services Administration (GSA) Fiscal Year 2023 Agency Report

**1. Please provide a summary of your agency's activities undertaken to carry out the provisions of OMB Circular A-119, "Federal Participation in the Development and Use of Voluntary Consensus Standards and in Conformity Assessment Activities" and the National Technology Transfer and Advance Act (NTTAA). The summary should contain a link to the agency's standards-specific website(s) where information about your agency's standards and conformity assessment related activities are available.**

OMB Circular A-119 assists our Agency to review our standards use on a recurring basis, and continuously assess the potential to expand use of non-government standards/ voluntary consensus standards when practical for the Government. This leads to increased efficiency in our work processes and contributes to greater reliability on product quality.

Standards play a significant role in the Federal Supply program. They are used to establish baselines for product quality, performance and features; allow competitive procurement of functionally equivalent products and; when necessary ensure interchangeability of products produced under different contracts and across different contract periods. The most significant aspect of our use of standards is to ensure the safety and durability of the products purchased for government use.

GSA maintains a Standards website: <https://www.gsa.gov/buy-through-us/purchasing-programs/requisition-programs/gsa-global-supply/supply-standards/index-of-federal-specifications>

**2. Please record any government-unique standards (GUS) your agency began using in lieu of voluntary consensus standards (VCS) during FY 2023. Please note, GUS which are still in effect from previous years should continue to be listed, and you do not need to report your agency's use of a GUS where no similar VCS exists.**

**Current total GUS: 3**

### **(1) Government Unique Standard**

Federal Specification KKK-A-1822E - Federal Specification for Ambulances [Incorporated: 2003]

### **Voluntary Standard**

ASTM F2020 - Standard Practice for Design, Construction, and Procurement of Emergency Medical Services Ambulances

### **Rationale**

The ASTM Standard Practice for Design, Construction, and Procurement of Emergency Medical Services (EMSS) Ambulances (ASTM F2020) is not practical for use, and therefore GSA uses the Federal Specification for Ambulances (KKK-A-1822E). GSA has determined the ASTM document is not practical for use for the following reasons:

- 1) GSA has determined that ASTM F2020 contains specific practices that are technically and economically impractical to use for the acquisition of commercial based vehicles because the

document is financially burdensome and technically ineffective. Specifically at issue is the ASTM Standard Specification for Medical Oxygen Delivery Systems for EMS Ground Vehicles, F1949-99 which is inclusive to ASTM F2020.

2) GSA has determined that ASTM F2020 is impractical because it is defined as a standard practice which is ambiguous and an ineffective substitution for specifications or requirements for use in GSA contract documents. ASTM F1949-99, a Standard Specification for Medical Oxygen Delivery Systems for EMS Ground Vehicles is included in ASTM F2020. ASTM F1949-99 is defined as a “standard specification”.

3) GSA has determined that ASTM F2020 is impractical because ASTM International does not provide interpretations and written guidance to their publications which is inadequate and less useful. ASTM members may only offer personal opinions. ASTM offers no mechanism to support timely resolution of conflicts between contractor and procurement organizations on technical subject matter. GSA provides interpretations, clarifications and engineering determinations when required. This is one of the most important concerns presented by the Ambulance Manufacturers Division (AMD).

4) The AMD has determined through consensus that it is impractical to replace the Federal Specification for Ambulances, KKK-A-1822E with the ASTM Standard Practice, F2020. GSA initiated a survey to collect public responses from a wide range of constituent users of the Federal Ambulance Specification. The National Association of Emergency Medical Technicians (NAEMT), the International Association of Fire Chiefs (IAFC), the National Association of State EMS Directors (NASEMSD) and the National Association of EMS Physicians universally accept and support the continued use of the Federal Specification. The AMD and constituent users have determined that it is impractical to replace the Federal Specification for Ambulances, KKK-A-1822E with the ASTM Standard Practice, F2020 because rule promulgation is complex and costly. Staff and administration resources would need to be diverted in each state EMS office to implement the change in statutes, public health codes, rules and regulations.

5) GSA has determined that ASTM F2020 is impractical because it is complex to GSA procurement efforts. While the current ASTM document recites many of the requirements from the Federal Specification, a future ASTM document would likely have diverging requirements unacceptable to the Government. This was verified by a member of the ASTM F2020 subcommittee at the September 4, 2003 meeting of the Federal Interagency Committee on Emergency Medical Services.

## **(2) Government Unique Standard**

FF-L-2937 [Incorporated: 2006]

### **Voluntary Standard**

UL 768

### **Rationale**

Federal Specification FF-L-2937 – Combination Lock, Mechanical used in lieu of UL 768 Combination Locks. The lock covered by the GUS is used for the protection of classified information and weapons. The UL specification did not meet identified government needs for dialing tolerance and bolt end pressure.

### **(3) Government Unique Standard**

MIL-G-9954 - Glass Beads for Cleaning and Peening [Incorporated: 2000]

### **Voluntary Standard**

SAE/AMS 2431 - Peening Media, General Requirements

### **Rationale**

This government-unique standard contains specific size & performance required for Air Force critical applications that are not present in the voluntary standards.