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OPERATIONAL SERVICES DIVISION POLICY GUIDANCE 26-01:

Update on Quality Assurance, COMMBUYS CLM, Mandatory Training Requirements, the Use of Other Agency Departmental Contracts, and the Agency Certification Process

To: Secretariat and Agency Chief Procurement Officers, Chief Fiscal Officers, and General Counsels

From: Mark S. Fine, Assistant Secretary for Operational Services, Operational Service Division

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Purpose

The purpose of this policy guidance is to update the Operational Service Division's (OSD) requirements with respect to Quality Assurance, COMMBUYS Contract Lifecycle Management (CLM), mandatory training, the agency certification process, and use of other agencies' departmental contracts. These efforts are a key part of the revised framework for procurement oversight and engagement that will make procurement easier for state agencies and offer better support.

Quality Assurance

OSD is committed to ensuring adherence to fair, open, and competitive procurement practices across state government to obtain best value and procurement integrity for agencies and the people they serve. OSD will continue to oversee Executive Department procurement functions by way of its annual certification process, conducting quality assurance reviews, and procurement practice evaluations, focusing on core procurement activities rather than on contract and financial management.

In consideration of this shift in OSD's oversight activities, the OSD Compliance Unit is being renamed the Quality Assurance (QA) Unit. This change reflects OSD's focus on maintaining high quality procurements, including well-drafted solicitations and evaluation criteria and the use of Statewide Contracts whenever available to obtain best value. For example, Executive Departments are required to ask for OSD approval when seeking a departmental contract when a Statewide Contract is available, but data suggests that this practice is not followed consistently or understood – leading to duplication and inefficiencies. Executive Departments will continue to receive real-time support and recommendations for improvement from QA Unit staff members, who may be reached at OSD.QA@mass.gov.

Reduced COMMBUYS CLM Requirements

Effective December 8, 2025, Executive Departments no longer are required to use COMMBUYS Contract Lifecycle Management (CLM) for the following activities:

- Creating Requests for Response (RFR) and Bid Amendments
- Creating Evaluation Criteria
- Executing the Standard Contract Form and Contract Amendments
- Creating Contract Package Documents (Form W-9, Contractor Authorized Signatory Listing (CASL) Form, Prompt Payment Discount (PPD) Form, Electronic Funds Transfer (EFT) Form)

Maintaining Procurement Files

In accordance with this change in mandatory use of CLM, OSD no longer will require departments to have a fully populated electronic "Contract Folder" in COMMBUYS CLM. However, while a Contract Folder no longer needs to be maintained in CLM, Executive Departments are **required to maintain a Procurement File** (pursuant to 801 CMR 21.06(1)), which must include the solicitation, bid amendments, bidder questions and answers, evaluation criteria, and data or other information relevant to a procurement and selection of a contractor(s), the executed contract form(s), correspondence with the contractor(s) related to the selection of a contractor(s), and applicable approvals or justifications.

To demonstrate that procurements are carried out consistently with fair, open, and competitive principles, the solicitation, bid amendments, evaluation criteria, and data or other information relevant to a procurement and selection of a contractor must be made publicly available on the core public COMMBUYS platform. This will ensure transparency and access to core procurement documents by interested parties. OSD's QA Unit will review Executive Department's practices relating to providing core procurement information on the public COMMBUYS platform. Contract Package Documents (Form W-9, CASL Form, PPD Form, and EFT Form) should not be uploaded to COMMBUYS, as these documents may contain security sensitive information.

Requesting Policy Waivers in COMMBUYS CLM

Executive Departments are still required to maintain a COMMBUYS CLM account for the following processes:

- Requests for approval to post Due Diligence Notices of Intent (NOIs)
- Requests for waivers from the mandatory use of Statewide Contracts
- Requests for approval to enter into Interim Contracts
- Requests to join or make purchases from other Cooperative Contracts
- Requests to make purchases from State Agency Departmental Contracts
- Other procurement exceptions requiring OSD approval

Revisions to OSD Mandatory Training Requirements

Effective December 8, 2025, mandatory training requirements will be changed. Procurement personnel who have completed OSD training courses no longer are required to retake them. Refresher and advanced training will be introduced for experienced procurement personnel at a later date. Changes to the mandatory training requirements are outlined below. For information about OSD training courses, please visit OSD's [Buyer Training website](#).

Given the reduced CLM requirements outlined above, COMMBUYS CLM training will no longer be mandatory, and current offerings will be suspended. OSD will develop refined CLM training and support for agency staff using CLM to submit required waiver and exception requests. In the interim, please reach out to OSD's Help Desk team at OSDHelpDesk@mass.gov for assistance with using the system for such requests. You also may contact OSD Legal at OSDLegal@mass.gov and the QA Unit at OSD.QA@mass.gov for questions or additional support.

COMMBUYS Procurement Purchaser

- COMMBUYS Purchasing (No retake required);
- Essentials of State Procurement (No retake required);
- COMMBUYS CLM (No longer mandatory – no longer offered);
- Strategic Sourcing Certificate Program (SSCP) required for Chief Procurement Officers (CPOs) (No retake required)

COMMBUYS Organization Administrator (OA)

- COMMBUYS Organization Administrator (No retake required)

COMMBUYS CLM Organization Administrator for Executive Department Procurement Staff

- COMMBUYS CLM OA (No longer mandatory – no longer offered)

COMMBUYS Basic Purchaser

- COMMBUYS Purchasing (No retake required);
- Essentials of State Procurement (No retake required)

Agency General Counsel (GC)

- Agency GC training is conducted by OSD Legal. OSD Legal will notify Agency GCs in upcoming months to schedule office hours and procurement training for agency procurement attorneys.

Use of Other State Agency Departmental Contracts

Effective December 8, 2025, Executive Departments may use the COMMBUYS CLM Exception Request process to request to use or “piggyback” another state agency’s departmental contract. This process should be used in accordance with best value principles of procurement of goods and services and is subject to OSD review and approval.

At the beginning of the procurement process, contracting agencies should assess whether to allow other agencies to utilize or “piggyback” their departmental contracts and, if so, the RFR should include language that expressly notifies bidders that other agencies may utilize the contract and identify those agencies to the extent possible. If the Executive Department is specifically identified in the RFR as a user of the departmental contract, the Executive Department does not need to submit an Exception Request. This new process should be used after the contract has been awarded when Executive Departments not specifically identified in the RFR seek to utilize the contract.

Before proceeding with this Exception Request, Executive Departments seeking to “piggyback” on a state agency’s departmental contract should obtain and include with the exception request written authorization from the contracting agency to utilize the contract, and written consent of the vendor to utilize the contract. The consent should be from an individual listed on the vendor’s CASL Form for the contract.

Additionally, Exception Requests should include information that is sufficient to address the following issues:

- Availability of the Good or Service on Statewide Contract: The contracting department should provide information regarding whether the procuring department reviewed OSD’s statewide contracts to determine whether the good or service sought is available on statewide contract and/or submitted a Request for Quotation (RFQ) on the statewide contract.
- Size and Scope of the Acquisition: The size and scope of the acquisition should be evaluated and compared to the original contract and awarding method to determine whether a new procurement or

different procurement method or increased bidder pool is preferable to further the principles of fair, open, and competitive procurement.

- **Subject Matter Comparison:** The contracting department should provide information whether the good or service sought is the same or substantially equivalent to that on the original contract and information whether the anticipated price, quality, nature of deliverables, and information about whether it changes the scope or value of the original procurement.
- **Contract Amendment or Other Negotiations:** The contracting department should indicate whether the original contract requires amendment or additional negotiations of price or other terms to accommodate the use of the contract. The contracting department also should outline the proposed process requirements it intends to undertake to utilize the original contract, (e.g. Statement of Work negotiation and execution, updates to COMMBUYS Master Blanket Purchase Orders (MBPOs), recording purchase orders, changes to the Master Agreement record, etc.)
- **Best Value Justification:** The contracting department should provide information establishing why this procurement method is preferable to other contracting alternatives (pricing, timing, nature of the procurement). The department should state whether there are exigent or emergency circumstances, whether market conditions support the exception request, and whether pricing concessions have been requested and obtained from the contractor based upon the increased volume of purchases.

Annual Agency Certification Process

All Executive Departments must complete an Annual Agency Certification. This process, launched in FY2025, significantly improved communication and responsiveness across departments. The process requires Secretaries and Agency Heads to appoint Chief Procurement Officers (CPOs) and enables key contacts in Executive Departments to certify their understanding of OSD's Quality Assurance programs, training requirements, and maintenance of up-to-date COMMBUYS organization accounts and related procurement staff accounts. This two-step process includes updating Key Contacts and signing off on a Certification Document. Procurement staff with a mass.gov email address may access [the Annual Certification page](#), which includes additional information about the process.

Updated Policy and Authority

This Policy Guidance updates OSD Policy Guidance 19-01 and rescinds in total OSD Policy Guidance 23-01 and the OSD Legal Compliance Executive Summary of April 6, 2023. The OSD Compliance Advisory of December 21, 2022, and the Compliance Advisory of June 16, 2021, are updated with this guidance and both are rescinded in part. OSD's *Conducting Best Value Procurements Handbook* also will be revised shortly to reflect these changes.

OSD oversight authority over the procurement of commodities and services by Executive Departments is found in M.G.L. c. 7, § 4A(a), M.G.L. c. 7, § 22, M.G.L. c. 30, § 51, and M.G.L. c. 30, § 52. These statutes form the basis of OSD's procurement regulation, 801 CMR 21.00, which provides all Executive Departments with uniform rules and standards governing the procurement of commodities or services, including human and social services for clients. OSD has delegated certain procurement authority to Executive Departments, meaning that Departments have been granted authority and responsibility to process procurement and contract transactions under the oversight of OSD.