



Executive Summary

A Publication of the Association of Proposal Management Professionals (APMP) National Capital Area (NCA) Chapter

Summer 2006

Volume XII, Issue III

Special points of interest:

- As an NCA member you have more opportunities for networking and education than anywhere else in the country!
- Access presentations from previous APMP-NCA Roundtables at www.apmp-nca.org/apmplibrary.html
- Self-update your e-mail address directly on the *NCA Member and Colleague Database* page on NCA's Web site

In this issue:

July 19 EVM Roundtable	2
Address/rebut negative past performance	3
The real cost of losing National Conference	4
Proposal accreditation	5
Join Government contracting leaders	6
Valuable benefits	7
Capture mgmt. recap	
EVM (cont.)	8
New Orleans highlights	9
New Orleans highlights	10
APMP-NCA info	11

President's Corner

Find Out How to Comply With OMB's New EVM Rules at the July 19 Roundtable



Michael Scruggs, MAPMP, APMP NCA President

Imagine you are driving cross-country on vacation. You didn't get the raise and the additional time off you had anticipated, so you are on a fixed budget and a tight schedule. The speedometer, odometer, and fuel gauge provide performance metrics, and several maps guide you to stopping points along the trip. You watch your cash carefully as you have budgeted every available dollar.

Throughout the trip, you determine the automobile's performance (miles per gallon and miles per hour), schedule (planned location verses actual location), and budget (money spent to that budgeted). Each of the metrics associated with time, performance, and budget helps you determine any

EVM is a project management tool that allows project managers to track money spent on a project as measured against planned milestones and deadlines.

variance from your original travel plan. When variances are identified, future corrective actions are taken. You don't want to run out of gas, cash, and vacation time in the middle of East St. Louis.

(Continued on page 8)

Call for Speakers for 2006 APMP Professional Day—October 25

Bob Lohfeld

The 2006 APMP Professional Day scheduled for October 25 will focus on best practices in proposal development and will provide a framework for personal and professional development as well as networking opportunities.

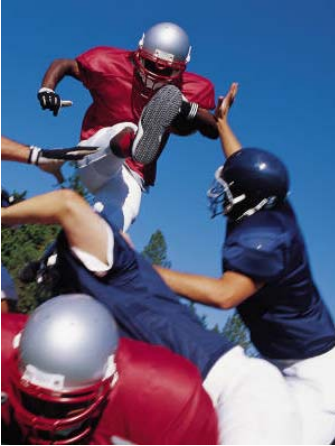
The Planning Committee has created an agenda that addresses topics that we identified as among the most important and often the most perplexing for proposal managers. The Committee now needs your help in identifying dynamic speakers to present on the following:

- Proposal Trends (RFIs, RFPs, turn-around times, evaluation criteria)
- Managing Proposals/Proposal Teams with Input from Multiple Companies



NCA's Professional Day speakers support your personal and professional development.

(Continued on page 8)



Learn how to compete on OMB's changing playing field.

New EVM Rules—How to Compete on OMB's Changing Playing Field

APMP-NCA's July Roundtable July 19, 2006; 5:30–8:30 p.m.

Before you write your next proposal, you need to know what it means to comply with OMB's newest and toughest Earned Value Management (EVM) requirements ever.

OMB's latest Federal Acquisition Regulation clause makes it mandatory to include EVM in all major investment program contracts. Along with the new requirements, OMB is reissuing the Capital Programming Guide, with even more guidance on implementing EVM. So your old understanding of EVM may no longer get your proposal the serious consideration it deserves.

Come to the July 19 Roundtable and find out:

- What EVM is all about and why the Government is sold on it
- What it takes to comply with today's EVM requirements
- Where EVM is likely to go in the future

Our presenter, **Wayne Abba**, is an internationally known speaker on EVM and program management topics and a public-sector EVM expert who heads up ABBA Consulting. Recent clients include the U.S. Navy, FAA, USAID, SAIC, and the Government of Japan. He is an expert advisor to a GAO team that is writing a Guide to Cost Estimating and EVM for auditors and all Agencies.

In 1999, following a distinguished career with the U.S. Government, he received the Project Management Institute's (PMI) Distinguished Contribution Award for advancing project management in the public and private sectors. He is an active member of the National Defense Industrial Association (NDIA) and a principal author of NDIA management guides that are being adopted by OMB for Civil Agencies and their contractors.

Mr. Abba is one of the most sought-after presenters on EVM and related topics, with recent engagements in Japan, India, Portugal, Turkey, and the UK.

Agenda:

- 5:30 p.m. Networking
- 6:15 p.m. Dinner
- 7:15 p.m. Announcements and Program

Registration Fees:

Cost: \$50 (payment received in advance) or \$65 (pay at the door)

Corporate Sponsor Guest Host:

G4i Consulting (<http://www.govg4i.com>)

Location:

Marriott Fairview Park, 3111 Fairview Park Dr., Falls Church, VA 22042-4550 703.849.9400

Register now...space is limited! If you plan to attend...please register and pay online by July 17, 2006 using PayPal at <http://apmp-nca.org/news/> or RSVP via email at rsvp@apmp-nca.org and mail your check to APMP NCA, POB 3063, McLean, VA 22103-3063.



Find out how to lead your team to proposal victory.



Legal Corner

Skeletons in the Closet: Addressing and Rebutting Negative Past Performance Information

Shlomo D. Katz

You have decided to target an opportunity with a new Government client. It is a perfect match for your company, and all indicators are that you are the leading contender. Unfortunately, your most recent contract was a fiasco. The work was completed pretty close to budget, but day-to-day performance was beset with frustrations—minor quality issues that, although corrected, left your customer annoyed and “personality issues” between your program manager and his or her Government counterpart. The bottom line is that the client is unhappy. Will the new customer hear about this negative past performance history?

How can contractors avoid or mitigate negative evaluations? Of course, the first line of defense is good performance. However, at some point every contractor will have real or perceived performance problems. Though good customer relations may help reduce the likelihood that problems will be written-up in a formal negative evaluation, sooner or later, many or most contractors will receive a negative review. Understanding Federal requirements for documenting past performance will help to mitigate unnecessary issues that can arise from negative reviews.

Federal Acquisition Regulation (FAR) 15.305 requires that past performance be an integral part of proposal evaluation. Beginning almost a decade ago, Federal Agencies were directed to institute formal procedures to record the performance of every prime contractor. Though Agencies were initially slow to implement this directive, as of a few years ago all Agencies were in full compliance.

Agencies are required to evaluate contractors at the end of each contract and on an interim basis during the period of performance. The Department of Defense shares a comprehensive database for contractor evaluations, the Contractor Performance Assessment Reporting System (CPARS). Another interagency past performance database is the National Institutes of Health (NIH) Contractor Performance System (CPS). Government Agencies and authorized contractors can also access a multi-Agency database portal called the Past Performance Information Retrieval System (PPIRS). All of these databases can be, and are, accessed by Agencies making award decisions.

FAR requires that Agency evaluations of contractor performance be provided to the contractor as soon as practicable after completion of the evaluation. Contractors are given a minimum of 30 days to submit comments, rebut statements, and provide additional information. Agencies must also provide evaluations to management at a level above the contracting officer for review when considering disagreements. This is your company’s most important right. *To best protect yourself, know your customer’s evaluation schedule, make sure you get a copy of all evaluations, and be certain to provide timely written responses.* While many contractors shy away from arguing with their customers in writing, especially if the Agency gives the contractor a chance to present an oral rebuttal, it is the written record that goes into PPIRS and remains there for three years. You must not miss the chance to get your side of the story told.

Remember not to argue for argument’s sake. If there are legitimate criticisms, demonstrate that you have learned from the experience and have taken meaningful corrective action. Make sure that you are being evaluated against the scope of work detailed in the contract, not what the evaluator would have liked you to have done. The Office of Federal Procurement Policy publication *Best Practices for Collecting and Using Current and Past Performance Information* (May 2000) instructs that the only proper measure of “quality” is “defined in contract standards.” Past performance “ratings should reflect how well (how close) the contractor complied with the specific contract performance requirements.” The Board of Contract Appeals ruled that, “Actions taken by the contracting officer based upon a subjective comparison with an unknown standard of performance cannot be supported.” It is your job to point out if you have been unfairly evaluated.

The annual performance review is not your only opportunity to mitigate negative past performance information. By monitoring your company’s past performance record on each of the databases mentioned above—see the Web sites listed in the endnotes for information on obtaining passwords—you will be able to write proposals that better address customer needs. For the same reason, it is important when receiving a post-award debriefing to ask the Agency if it considered any negative past performance information that you have not had a chance to address. This feedback will help you address the information in future proposals and it may also identify a basis for a bid protest.

(Continued on page 7)



To best protect yourself, know your customer’s evaluation schedule, make sure you get a copy of all evaluations, and be certain to provide timely written responses.



By monitoring your company’s past performance record...you will be able to write proposals that better address customer needs.



There are no unimportant bids, and there can be and often are consequences to silly and stupid bids.

The Real Cost Of Losing

Doug Allston

One of the things we have learned from talking with hundreds of people who have sat on Source Selection Boards is that most bidders should not have bid. I would estimate that at least 60% of the bidders on any procurement just should not have bid. They should not have bid because they did not know and/or understand the Government's situation. They were not aware of decisions made by the Government and/or future plans that precluded certain solutions. Bidding without this knowledge and understanding made the company's technically competent proposal look silly and stupid. It's like the guy going bald who goes to hair transplantation specialists. He doesn't want just hair on his head. He wants hair that blends in with the hair he already has. So, the redheaded guy with straight hair who leaves the operating table with black, curly hair in his bald spot is probably not going to be happy. Not only is he likely to be unhappy, but he is going to tell everyone he knows how stupid and incompetent the doctor was who gave him the black, curly hair.

What we see from many companies is the lack of appreciation that there can be and often are consequences to silly and stupid bids.

"But Doug, we can't win unless we bid."

Everyone has the story about someone winning the contract by responding to an RFP they knew little or nothing about. I have actually hunted down a couple of these stories, and they have turned out to be mostly a story where a lot of relevant information was left out. I don't doubt that about 26 years ago someone wrote

a cold proposal and won, and this story has been retold and retold over and over again. The facts are that for every lucky win, there are hundreds of companies who have written silly proposals. The Government employees laughed and talked about the silly proposal for months, and the company was unofficially branded as a "loser company" in the Government organization. In other words, they were never taken seriously in future bids in that organization. The bottom line is you can't win unless you bid; however, losing can cost you an entire Government organization as a future client. Now this would not be a major problem if the Government branded the business unit within the company the loser, but they don't. A year later when another business unit bids on an entirely different project, they do not realize they have lost before they even started.

"Charlie, that loser Advantage Widget Company wants to meet with me and talk about our XYZ project. You remember how they hosed up their proposal on the ABC project. I will give them a few minutes, be polite, and show them the door. In fact, I will even tell them that our loved incumbent is in trouble, and they will waste their time writing a proposal. Their proposal should be worth a few laughs."

Can you bid when you know you may lose? Certainly, but you should never bid when you do not thoroughly understand the client and their situation. There are no unimportant bids. By the way, I am aware of cases where a company bid and lost, but because they knew and understood the Government's organization, the Source Selection Authority actually branded them a winner and instructed their staff to find work for them.

Doug Allston is President of Advantage Consulting, Inc. For more information, please contact him at (703) 642-5153 or dallston@acibiz.com.

Recap of 17th Annual APMP Conference – New Orleans May 24–26, 2006

APMP held its 17th Annual APMP Conference May 24–26, 2006 in New Orleans. Viewing the still clearly evident Hurricane Katrina destruction gave conference participants a renewed empathy for the hurricane victims and a sincere appreciation for APMP's decision to hold its conference in New Orleans and to support the area's economy and rebuilding efforts.

450 APMP members attended the conference including 85 enthusiastic representatives from APMP-NCA.

Beth Wingate, FAPMP, APMP Board Member and Proposal Center Director for Management Systems Designers, Inc. (MSD), and Michael Scruggs, FAPMP, APMP President and Director of Proposal Management for OnPoint Corporation, shared information about the NCA Chapter during Thursday's luncheon, which was accompanied by a raffle for six "Mardi Gras" gift baskets sponsored by the NCA Chapter.

More pictures of Conference "happenings" appear on pages 9–10 of this newsletter.



Beth Wingate and Michael Scruggs awarded gift baskets to lucky attendees.



APMP is the only independent, international organization endorsing the proposal profession.

New Proposal Accreditation Available

Michael Scruggs, MAPMP, and Beth Wingate, MAPMP

Since 2000, APMP has studied an accreditation program designed for proposal management professionals. At the 2006 Annual Conference in New Orleans, APMP promoted a Proposal Management Accreditation for the proposal development profession.

Most companies invest in their staffs' professional development, recognizing that this provides future benefits to the companies. By sponsoring your accreditation, your organization demonstrates that it acknowledges the proposals-related discipline as "professional" and validates its commitment to investing in its employees. APMP is the only independent, international organization endorsing the professionalism of those developing winning business with proposals.

Accreditation is based on three levels of increasing difficulty:

- **Foundation Level** – Requires an individual to demonstrate knowledge of industry best practices for proposal development through successful completion of a 75-question exam. An individual must also possess a minimum of one year's proposal development experience.

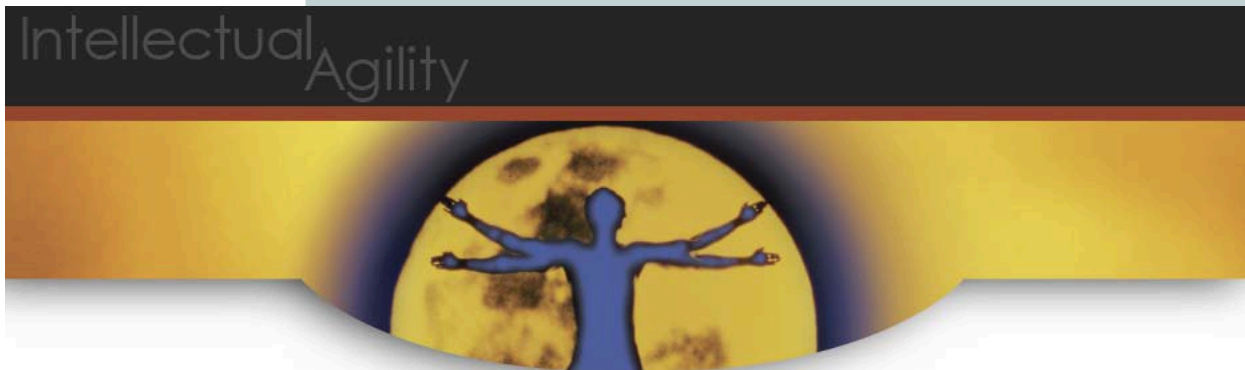
- **Practitioner Level** – Requires a competency self-assessment followed by a review by an APMP-Approved Assessor. The Approved Assessor also verifies that the individual has a minimum of three years' proposal development experience.
- **Professional Level** – Requires a detailed assessment, followed by a personal review by an approved APMP professional. Accreditation at the Professional Level requires at least seven years' verifiable proposal development experience.

You can prepare for the Foundation Level exam using your company's proposal resources as well as:

- APMP's Glossary of Terms at www.apmg-exams.com/web/site/UKPGlossary.asp
- Microsoft Word training available at <http://office.microsoft.com/TRAINING>
- The Shipley Proposal Guide (Author: Larry Newman, Shipley Associates) available at amazon.com or www.shipleywins.com.

Currently, there are over 450 professionals accredited at the Foundation Level. Approximately 30 professionals have completed accreditation at the Professional Level.

APMP designates Approved Training Organizations (ATOs) to facilitate accreditation. Currently, Shipley Associates is the only ATO in the U.S. Visit www.apmp.org or www.shipleywins.com for additional details.



MSD is an employee-owned company that has been providing innovative information technology, business management, and scientific solutions to the Federal Government since 1980.

MSD delivers solutions targeted to meet your challenges, while providing the reliable, secure, and cost-effective tools and technologies needed to support your organization's critical objectives.

Smart people. Smart solutions. Smart technology.



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Join Government Contracting Leaders—Maximize Growth!

Chris Stahl

The Association of Proposal Management Professionals' (APMP) National Capital Area (NCA) Chapter is now identifying Corporate Partners to join its professional organization and to support our 2006 Professional Day. NCA is the largest APMP chapter, and its success is largely due to the massive support extended from its members and the Chapter's 13 corporate partners. Together, the Chapter holds a wide variety of events including its annual Professional Day.

This year's Professional Day is scheduled for October 25. At past Professional Day events, top performers in Government contracting have shared their experiences, tools, and techniques with attendees. This information and advice helps our members stay on the cutting edge!

Joining NCA's Corporate Partners Program and attending Professional Day offers tangible benefits. Email me for a package that explains Corporate Partner program features and benefits and how your corporation or organization benefits by supporting APMP's most successful chapter.

Joining NCA gives you immediate access to:

- The country's largest chapter of proposal management professionals including capture managers, proposal managers, and proposal support professionals

- Key decision makers in a variety of organizations of all sizes and markets
- Numerous networking opportunities to develop teaming, subcontracting, and other relationships
- A strong curriculum of professional development programs

Joining NCA's Corporate Partner Program provides the following benefits:

- Free 2006 APMP membership (a \$95 value)
- Free 2006 Roundtable meetings (a \$150 value)
- Opportunity to display a booth at the October 25, 2006 Professional Day at no cost and one attendee voucher (a \$200 value).

In addition, your Corporate Partner membership entitles you to free advertising including a free subscription to the NCA newsletter, free listing in our Resource Directory, an opportunity as a guest host at one of our Roundtable events, and a certificate of recognition.

To confirm your sponsorship, please e-mail or fax your commitment with point of contact information to:

Christopher Stahl

Chairperson of Corporate Partner Program

cstahl@govg4i.com

Phone: (703) 433-5460

Fax: (877) 286-9645

We look forward to continuing an exciting year of new events and new members making it a rewarding year.



Information and advice gained at Professional Day helps our members stay on the cutting edge!

Who Can Benefit From APMP?

- **Senior management executives** who are leading proposal quality initiatives in their organization
- **Proposal managers** looking for the latest tools, tips, techniques, and other career enhancements
- **BD/marketing professionals** who prepare proposals to win new contracts
- **Corporations and Agencies** who are responsible for proposal development, production, and evaluation
- **Anyone who wants access to the best** state-of-the-art proposal knowledge available in the world and to meet the individuals who are developing it

APMP-NCA Job Bank

Proposal Manager

RTI International

3040 Cornwallis Road, RTP, NC 27709

Attn: Recruiter, mbasile@rti.org

Posted: 5/30/2006

Proposal Writer

Mind & Media, Inc.

15 North Loudoun St., Ste 100, Winchester, VA 22601

Attn: Tammy Corbin, tcorbin@mindandmedia.com

Posted: 6/08/2006

COO

SkillStorm Government Services Division

6540 Lusk Blvd., Ste C155, San Diego, CA 92121

Attn: Vince Virga, vince@skillstorm.com

Posted: 6/08/2006

Proposal Manager

Northrop Grumman Electronic Systems, Defensive

Systems Division, Rolling Meadows, IL 60008

Attn: Patricia Geier, p.geier@ngc.com

Posted: 6/09/2006



Joining APMP-NCA links you directly to the largest chapter of proposal management professionals in the U.S.



Join NCA colleagues at Professional Day—it's a great way to refresh your knowledge and network too!



Effective capture management habits are created through the coalescence of knowledge, skills, and desires.



Failure to address negative past performance info could mean the loss of a lucrative contract award.

APMP Members Rank Networking and Practical Education As Most Valuable Benefits

Jay Schiavo

When asked what's most important among the benefits of APMP membership, NCA Chapter members almost unanimously agree—it's the information, knowledge, and connections with people that motivate them to join and renew each year.

As a member of the National Capital Area (NCA) Chapter, there are more opportunities for networking and education than anywhere else in the country!

Keep up with your competitors with the latest proposal tools and techniques at APMP-NCA Roundtable dinner events.

Mark your calendar for all the upcoming Roundtables and make it a point to be there. It's a great way to stay ahead of the proposal learning curve and a good place to make and renew business relationships.

May 17 Roundtable Explores Capture Management Habits

More than a few laughs accompanied John Picarelli's "The 7 Habits of Highly Effective Capture Managers and the 10 P's to Get There" presentation at NCA's May 17 Roundtable at the Fairview Marriott Hotel.

Mr. Picarelli developed a presentation exclusively for the Roundtable event that focused on three vital areas of capture management—understanding the roles and responsibilities of capture managers, development of effective habits for capture management success, and tips to improve capture management performance and execution.

(Skeletons...Continued from page 3)

Nonetheless, keep in mind that GAO has determined that Agencies are required to advise offerors of only significant past performance problems. Where a contractor's past performance record is generally good, but not excellent, Agency officials are under no obligation to bring a less-than-glowing comment to the contractor's attention.

Contractors expecting to do business with the Government must keep close watch on their past performance ratings. Failure to monitor these reports,

Join us at the Fairview Park Marriott in Falls Church on July 19, September 20, and November 15. Register online at <http://apmp-nca.org/news/>.

Refresh your knowledge of winning practices every fall at APMP-NCA's Professional Day.

Take a day off from work and renew your skills and refresh your knowledge at Professional Day on October 25 at Northrop Grumman in Fairfax. The day is packed with eight back-to-back sessions with plenty of time to network too! Look for details coming up at www.apmp-nca.org.

Stay current and connected with colleagues from around the country at APMP's Annual Conference held every spring.

Make plans for next year's Annual Conference in Savannah, GA, May 29–June 1, 2007. Look for information coming up at www.apmp.org.

Not an APMP member yet?

Join online at www.apmp.org (Click on "About Us").

Mr. Picarelli initiated the presentation by asking two questions: "What are the basics of capture management?" and "What are the focused and disciplined habits needed to be an effective capture manager and how can one get there?" His presentation prompted several questions from the audience including the relationship between capture managers and proposal managers.

Mr. Picarelli is President of Business Development Associates. His presentation materials are available for viewing on the APMP-NCA Web site at www.apmp-nca.org/library/may_17_2006_picarelli/index.htm. For more information, please contact Mr. Picarelli at (202) 413-8990 or jpicarelli@bww.com.

or to include rebuttal information and/or otherwise address negative past performance information, ultimately could mean the loss of a lucrative contract award.

Shlomo D. Katz is Senior Counsel in the Washington, DC office of the national law firm of Epstein Becker & Green, a Corporate Sponsor of APMP-NCA. If you have any questions about these or other proposal issues, please feel free to contact Mr. Katz at (202) 861-1809 or skatz@ebglaw.com.



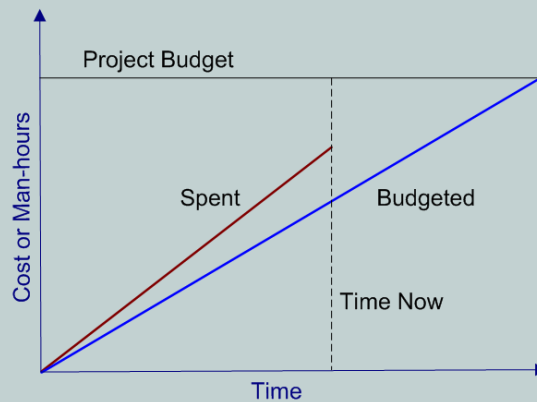
New reporting tools allow almost real-time collection of performance metrics for a better understanding of a project in addition to examining the tasks accomplished.

(President's Corner...Continued from page 1)

This exemplifies Earned Value, a technique for measuring performance by comparing work completed against work planned at a given date in a project schedule. Earned Value Management (EVM) is a project management tool that allows project managers to track money spent on a project as measured against planned milestones and deadlines.

Performance metrics are the core of EVM.

Performance metrics are collected, recorded, and reported at the Work Breakdown Schedule (WBS) element level, with the Budgeted Cost of Work Scheduled and the Actual Cost of Work Performed. At the WBS task level, metrics calculated and reported include the Budgeted Cost of Work Performed, Schedule Variance, Cost Variance, Schedule Performance Index, and Cost Performance Index. New reporting tools now allow for almost real-time collection of performance metrics for a better understanding of the project in addition to examining the tasks accomplished.



EVM provides contractors with a more accurate methodology for real-time tracking of cost and labor against project schedules.

EVM is the newest tool designed to improve information technology (IT) project management in the Federal Government. The Office of Management and Budget's (OMB) latest Federal Acquisition Regulation (FAR) clause makes it mandatory to include EVM in all major investment program contracts. In addition to this requirement, OMB is reissuing the Capital Programming Guide, with even more guidance on implementing EVM.

At APMP-NCA's July 19, 2006 Roundtable, from 5:30–8:30 p.m. at the Fairview Park Marriott in Falls Church, Mr. Wayne Abba will present more information about EVM including:

- What EVM is all about and why the Government is sold on it

- What it takes to comply with today's EVM requirements
- Where EVM is likely to go in future

Mr. Abba is a public-sector EVM expert who heads up ABBA Consulting. He is one of the most sought after presenters on EVM and related topics, with recent engagements in Japan, India, Portugal, Turkey, and the UK. His recent clients include the U.S. Navy, FAA, USAID, SAIC, and the Government of Japan, and he is an expert advisor to a GAO team that is writing a Guide to Cost Estimating and EVM for auditors and all Federal Agencies.

Register early for this "must attend" Roundtable at [http://apmp-nca.org/news/!](http://apmp-nca.org/news/)

(Professional Day...Continued from page 1)

- Metrics for Proposal Management
- Price to Win/Pricing Strategies
- Effective Oral Presentations
- IDIQ Response Management
- Government Perspective on Proposal Evaluation
- Evaluating GWAC Responses (a panel of three or four Government contracting officers with GSA, DoD, etc. participation)
- Government Evaluation of Performance-based Acquisitions (Are PBAs a passing fad and does the Government really intend to partner with contractors?)

Please email your recommendations and referrals to Robert Lohfeld at robert.lohfeld@lohfeldconsulting.com or call (410) 336-6264.



EVM is the newest tool designed to improve IT project management in the Federal Government.

Did You Know?

Presentations from previous APMP-NCA Roundtables and copies of prior newsletters are available for downloading at www.apmp-nca.org/apmplibrary.html

Check out this valuable source of proposal-related hints and tips!

Highlights of the 17th Annual APMP Conference— New Orleans May 24–26, 2006



John Elder (left), Managing Editor of APMP's *Proposal Management Journal* receives APMP's Compatriot's Award from David Winton (right), APMP Executive Director.



Dr. Terry Tarbell (left) presents APMP's Fellows Award to Robert Frey (right).



APMP conference attendees enjoyed the opportunity to visit multiple proposal support vendors in one location.



APMP showcased national and local chapters' publications and support materials.

Highlights of the 17th Annual APMP Conference— New Orleans May 24–26, 2006



SM&A's team enjoyed meeting conference attendees and sharing their capabilities and services.



David Winton shared APMP goals and objectives during lunch.



Smiles abounded between training sessions in New Orleans.



Conference attendees learned multiple tactics to "Lead the Way" in proposal and business development from training sessions and proposal support vendors.



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**APMP-NCA Board of
Directors Meetings
Open to Members**

The Board of Directors for APMP NCA meets the first Tuesday of every month. Every other meeting is a virtual meeting-telephone conference. These meetings are open, and APMP members may attend.

Anyone interested in the topic is invited to attend our meetings. You do not have to be an APMP member or even a proposal specialist to attend an NCA Roundtable. If you are interested in proposals, business development, and professional development, we'd like for you to join us!

**Mark Your Calendar for
2006 APMP-NCA Events**

- July 19** Roundtable (NCA Membership Meeting)
- September 20** Roundtable (NCA Membership Meeting)
- October 25** Professional Day
- November 15** Roundtable (NCA Membership Meeting)

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- Patricia Westlein, Director at Large, Professional Day, patricia.westlein@amti.com