



United States Department of the Interior
Office of the Secretary



LIMITED SOURCES JUSTIFICATION
In Accordance With FAR 8.405-6
Task Order D13PD01125
Modification P00025

This acquisition is conducted under the authority of the Multiple Award Schedule Program.

1. Identification of the agency and the contracting activity, and specific identification of the document as a Limited Sources Justification.

This document is a Limited Sources Justification for the Department of the Interior (DOI), Interior Business Center (IBC), Acquisition Services Directorate (AQD), Division II Branch II on behalf of the Department of Health and Human Services (HHS), National Institutes of Health (NIH), National Cancer Institute (NCI).

2. Nature and/or description of the action being approved.

This proposed action is to extend the period of performance in accordance with FAR Clause 52.212-4, *Contract Terms and Conditions – Commercial Items, (c) Changes*, for Task Order D13PD01125 with SRA International, Inc. under General Services Administration (GSA) Contract No. GS-35F-088AA. This extension will be for a six (6) month period of performance from May 1, 2019 to October 31, 2019 for Task 2.4.7.2 *Security Assessment Support* only.

3. A description of the supplies or services required to meet the agency's needs (including the estimated value).

NCI has an ongoing requirement for Security Assessment Support. NCI requires qualified professional staff to provide SA&A Support (formerly known as Certification and Accreditation) of NCI systems in consultation with the NCI Information Systems Security Officers (ISSO) and the NCI/Center for Biomedical Informatics and Information Technology (CBIIT)/Director of Information Security. Support in this area shall include:

- System security categorization;
- Definition of system baseline security requirements ;
- Performance of system test and evaluation (ST&E);
- Performance of annual security controls testing;
- Development of risk assessments;
- Development of system security plan;
- Development of system plan of action and milestones (POA&M);
- Development of self-assessments;
- Preparation of documents such as system owner letters, certification memos, and accreditation letters; and

- Input of all data into the NIH Certification and Accreditation Tool (NCAT) and maintenance of that data.

This six month extension is being requested to avoid any interruption in service while AQD competes a new task order for these services on behalf of NCI. The intended award date for the new task order is by the end of Fiscal Year 2019 (FY19). The extension will be incrementally funded so the Government will be able to transition services and remaining current-year funds to the new task order once awarded.

The current POP expires on April 30, 2019. The estimated value for these services is \$623,570.00 for six months until October 31, 2019. This increases the total ceiling of the task order from \$185,503,882.60 by \$623,570.00 to \$186,127,452.60 (an increase 0.34%). Travel is not anticipated during this extension.

4. The authority and supporting rational (see [8.405-6\(a\)\(1\)\(i\)](#) and [\(b\)\(1\)](#)) and, if applicable, a demonstration of the proposed contractor's unique qualifications to provide the required supply or service.

FAR 8.405-6(a)(1)(i)(B) - Only one source is capable of providing the supplies or services required at the level of quality required because the supplies or services are unique or highly specialized.

The current contract expires on April 30, 2019 and efforts are currently underway to compete this requirement as part of a new contract vehicle. To ensure that the client's needs are met during this time, it is necessary to award an extension pursuant to the current contract. As NCI requires continuous support during this time, it is not feasible for another Contractor to continue to provide these services. The extension will provide the necessary time it will take for NCI to compete and award the replacement vehicle for these services. Therefore, the task order is being extended for an additional six months to accommodate the re-compete timeline.

The contractor, SRA International, Inc. is uniquely qualified to continue to provide services as it has been involved with the services required by the contract for over 5 years and has successfully provided the services throughout the life of the award. No other vendor can provide the services at the same level of quality or timeliness during the extension period considering price, lead time, and administrative burden, and meet the client's needs. The labor rates shall remain the same as in Option Period 5 of the contract in accordance with the Contractor's revised price quote.

5. A determination by the ordering activity contracting officer that the order represents the best value consistent with FAR 8.404(d).

Prices for the base and all option periods were discounted from the GSA Schedule rates and determined to be fair and reasonable at the time of the task order award. Even though FAR 8.404(d) indicates that the rates for services offered at hourly rates under schedule contracts are

fair and reasonable, AQD conducted an informal analysis that compared SRA International's rates to the average rates for these labor categories by using GSA's CALC tool:

Labor Category	SRA's Current Rate	GSA CALC Average Rate*
Program Manager		\$181.00
Senior IT Specialist		\$139.00**
IT Specialist		\$122.00
Tech Writer/Admin Support		\$74.00

*Average rates are generated from current GSA Schedule 70 contract holders, including both small and other than small businesses and both contractor and Government work site.

**The Senior IT Specialist Labor Category did not yield enough data using these search parameters, so the parameters were widened to include all GSA Schedules.

The Federal Supply Schedule rates were already deemed fair and reasonable by GSA and the Contracting Officer determined the task order rates fair and reasonable at the time of award. The extension price was based upon the current Option Period 5 rates and the historical hours required for Task 2.4.7.2. Additionally, the contractor has not increased their labor rates since the task order was awarded in 2013. As a result, it has been determined by the Contracting Officer that the extension represents the best value to the Government.

6. A description of the market research conducted among schedule holders and the results or a statement of the reason market research was not conducted.

With the exception of the market research regarding rates noted in Section 5, market research for sources was not conducted at this time as this is an extension of a current award. SRA International's GSA Schedule Contract is still current.

7. Any other facts supporting the justification.

This is a modification to a task order under a GSA Schedule Contract. This modification would have been necessary for any Contractor to ensure that NCI receives the continuous support required. Only support required to maintain current NCI program needs will be provided under this extension.

8. A statement of the actions, if any, the agency may take to remove or overcome any barriers that led to the restricted consideration before any subsequent acquisition of supplies and services is made.

AQD is currently re-competing these services as part of a new contract vehicle. This extension under FAR 52.212-4(c) will only be utilized until the support can be transitioned to the new contract vehicle. A delay in modifying this requirement to extend the POP would be detrimental to the mission of NCI and would result in a gap in service.

9. Contracting Officer's Certification.

I certify that this justification is accurate and complete to the best of my knowledge and belief.

VIRGINIA TAYLOR

Digitally signed by VIRGINIA
TAYLOR
Date: 2019.04.16 10:05:04 -04'00'

4/16/2019

Jenny Taylor
Contracting Officer

Date

10. Evidence that any supporting data that is the responsibility of technical or requirements personnel (e.g., verifying the Government's minimum needs or requirements or other rationale for limited sources) and which form a basis for the justification have been certified as complete and accurate by the technical or requirement personnel.

I certify that the technical data which forms a basis for this justification is complete and accurate and meets the Government's minimum needs.

Donald E. Hall II -S

Digitally signed by Donald E. Hall II
-S
Date: 2019.04.16 10:47:10 -04'00'

4/16/2019

Donald Hall
Contracting Officer's Representative

Date

11. A written determination by the approving official identifying the circumstance that applies to the order.

FAR 8.405-6(a)(1)(i)(B) - Only one source is capable of providing the supplies or services required at the level of quality required because the supplies or services are unique or highly specialized.

12. Reviews and Approvals

Concur

ROBERT BROWN Digitally signed by ROBERT
BROWN
Date: 2019.04.16 13:13:38 -04'00'

Melissa Onyszko
Branch Chief

4/16/2019

Date

Approve

HEIDI HERRON Digitally signed by HEIDI HERRON
Date: 2019.04.19 11:51:28 -04'00'

Heidi Herron
Division Chief

4/19/2019

Date