

Limited-Sources Justification (LSJ)

LSJ No.: FY19-0133

This acquisition is conducted under the authority of the Multiple-Award Schedule Program, 41 U.S.C. 152(3), Competitive Procedures, and 40 U.S.C. 501, Services for Executive Agencies.

1. Agency and Contracting Activity.

The Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS), Office of Contracting and Office of Information Technology, propose to extend an order pursuant to FAR 8.405-6(a), Limiting Sources.

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

DHS USCIS intends to extend Task Order # HSSCCG-17-F-00258 by [REDACTED]. The original period of performance of the Task Order was 9/30/17 – 3/29/19. [REDACTED] Pursuant to FAR Part 8.405-6(a), DHS USCIS intends to limit the number of sources solicited for the continuation of Amazon Web Services (AWS); specifically, USCIS will extend the current order to JHC Technology, 401 Post Office Rd., Suite 201, Waldorf, MD 20602-3225.

3. Description of Supplies/Services.

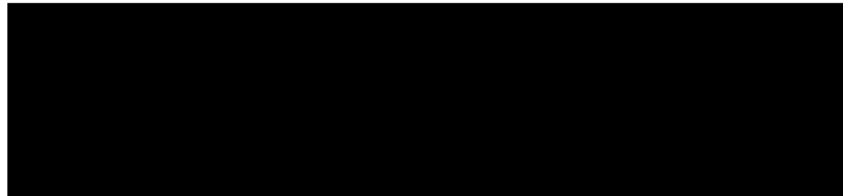
The extension of task order, HSSCCG-17-F-00258, with JHC Technology is for the continuation of AWS cloud hosting. [REDACTED]

The task order currently provides hosting in the AWS cloud environment for the following large and highly visible systems at USCIS:

- Electronic Immigration System 2 (ELIS 2)
- MyUSCIS.GOV
- Verification Information System (VIS)
- Customer Profile Management System (CPMS)
- General Support Services (GSS)
- Data Business Intelligence Systems (DBIS)
- National File Tracking System (NFTS)
- Enterprise Service Bus (ESB)
- National Appointment Scheduling System (NASS)

Limited-Sources Justification (LSJ)
For orders or BPAs exceeding the Simplified Acquisition Threshold

USCIS has utilized AWS for the successful operation of numerous software hosting services for the agency. These hosting services include Amazon accounts and Infrastructures as a Service (IaaS). The USCIS Office of Information Technology (OIT) is utilizing continuous delivery methodologies (DevSecOps pipelines) for building quality software that is developed, built, tested and implemented into production quickly in a rapid succession.



4. Authority and supporting rationale.

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.

This extension is being conducted under the authority of the Multiple-Award Schedule Program, 41 U.S.C. 152(3), Competitive Procedures, and 40 U.S.C. 501, Services for Executive Agencies, in accordance with FAR 8.405-6(a), Limiting Sources. An order extension will be made with AWS reseller, JHC Technology, from the original Federal Supply Schedule order #HSSCCG-17-F-00258 pursuant to FAR 8.405-6(a)(1)(i)(B). The original award was solicited among resellers and awarded using the ordering procedures at FAR 8.405. While there was competition among resellers, it was limited, as this solicitation included an LSJ for brand name for AWS. It is necessary to limit competition for extending the task order described herein because the loss of hosting essential systems on the AWS cloud would directly affect USCIS' ability to perform mission critical functions. Since JHC is the current reseller of AWS, they are the only contractor that can provide the services to USCIS in the short timeframe within which the extension is required. Based on the dollar value of this requirement, several reviews are necessary prior to solicitation and award; there is not time to complete the process for awarding a new task order before the current order expires.

The majority of USCIS critical systems run in the AWS environment. These include ELIS2, CIS2, myUSCIS and E-verify. Additionally, the timeframe in which USCIS needs these services coincides with "CAP Season" for H1B processing. All H1B applications are entered into systems that are running in AWS and would not be able to be processed if AWS was not available. Additionally, Form I-539s are currently being digitized through a system that resides in AWS. This is part of the 2020 eProcessing initiative. Any disruption in service would be mission impacting and have severe financial consequences for the agency.

Limited-Sources Justification (LSJ)
For orders or BPAs exceeding the Simplified Acquisition Threshold

USCIS is actively engaged in a competitive recompete effort for these cloud hosting services. USCIS is currently recompeting this requirement as a competitive BPA off GSA Schedule 70, which will include the AWS requirements as well as other USCIS cloud hosting requirements. Based on the government shutdown and industry questions in response to the solicitation for the new effort, the timeline for the recompete has been extended. During the government shutdown, several reviewers were not available which caused significant delays in the timeline. The recompete solicitation was posted on 2/27/19; this evoked industry questions about the small business set-aside strategy for the recompete. Ultimately, it was determined that the strategy needs to be changed to Unrestricted. Based on this strategy change, the solicitation must be posted for an additional two weeks to allow large businesses time to provide a quote. [REDACTED]

[REDACTED]

[REDACTED] This extension will allow USCIS to continue receiving the required AWS cloud hosting services with no interruptions while the recompete of this effort is finalized.

[REDACTED]

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

The Contracting Officer has determined that extending the current task order to JHC Technology for AWS cloud hosting represents the best value and will result in the lowest overall cost, considering price and administrative costs, to meet the Government's needs [REDACTED] This order was originally placed in accordance with FAR 8.404, "Use of Federal Supply Schedules." The General Services Administration (GSA) has already negotiated fair and reasonable pricing rates. Discounts to these GSA schedule rates were achieved upon task order award, and are expected to continue for the proposed extension. JHC Technology has indicated that, should the task order be extended, they will continue to offer the same discount rate that is currently in the task order. The discount is a percentage off the current market rate. Additionally, the task order specifies that all rates must be lower than the contractor's GSA Schedule rate, which was previously determined to be fair and reasonable.

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.

Limited-Sources Justification (LSJ)
For orders or BPAs exceeding the Simplified Acquisition Threshold

Informal market research was conducted to validate that no other reseller can begin provisioning USCIS accounts within the required timeline to avoid a lapse in service. USCIS OIT and the Office of Contracting conducted market research on AWS cloud hosting with other companies under GSA FSS 70 SIN 132-40 for the recompetes. Based on the dollar value of this requirement and the required reviews for awarding a contract of that size, there is no way the government could award this work to a new reseller in the timeframe required to avoid a lapse in service.

7. Any other facts supporting the limited-sources justification.

There are no additional facts to support this justification.

8. A statement of actions, if any, the agency may take to remove or overcome any barriers that led to restricted consideration (i.e., limited-sources) before any subsequent acquisition for the supplies or services is made.

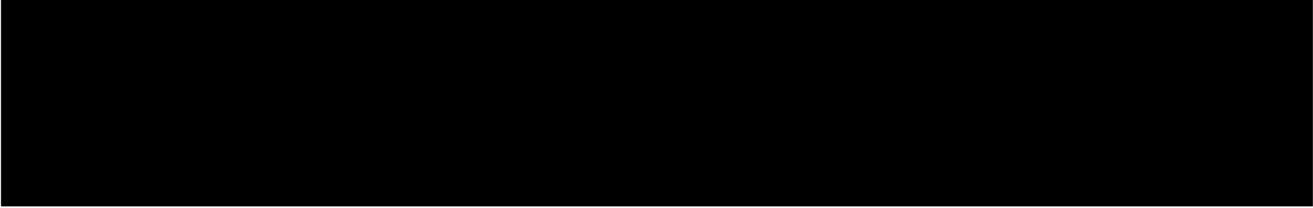
USCIS will try to consider unforeseen circumstances when building future milestones, so they can be accounted for in the timeline. The barrier to competition is already being eliminated by the currently ongoing recompetes for this effort. The recompetes are open to all Schedule 70, SIN 132-40 contract holders, and is for a BPA that will include multiple different cloud hosting environments (in addition to AWS). The BPA will also include multiple different Software as a Service brands. USCIS will continue to explore ways to foster competition for this work in the future.

9. DHS intends to post this requirement on Fedbizopps pursuant to FAR 8.405-6(a)(2)(i).

Limited-Sources Justification (LSJ)
For orders or BPAs exceeding the Simplified Acquisition Threshold

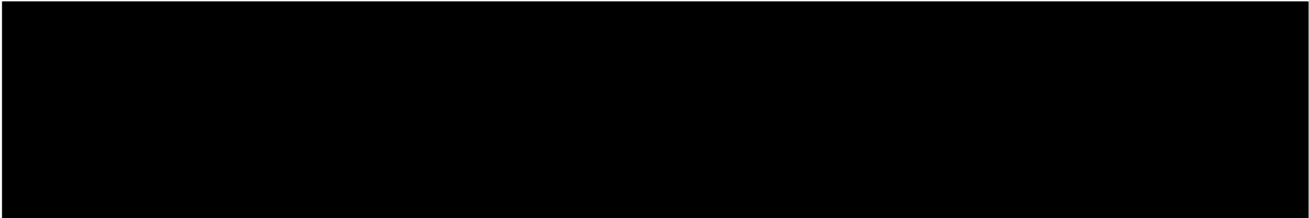
10. Technical/Requirements Personnel Certification.

Pursuant to FAR 8.405-6(c)(2)(x), I certify that this requirement meets the Government's minimum need and that the supporting data, which form a basis for the Limited-Sources Justification, are accurate and complete.



11. Contracting Officer Certification

Pursuant to FAR 8.405-6(c)(2)(ix), I certify that the Limited-Sources Justification is accurate and complete to the best of my knowledge and belief:



12. Approval.

Pursuant to FAR 8.405-6(c)(2)(xi), I hereby determine that the circumstances in FAR 8.405-6(a)(1)(i)(B) apply.

