

## **Justification for Other Than Full and Open Competition**

In Accordance with Federal Acquisition Regulation (FAR) 6.302-1 and VA Acquisition Regulation (VAAR) 806.3, this justification contains facts and rationale to justify the use of 10.U.S.C. 2304(c)(1) using the following information:

*(1) Identification of the agency and the contracting activity:*

Requiring Activity: Gabriel Duncan <a href="mailto:Gabriel.duncan@va.gov">Gabriel.duncan@va.gov</a> Department of Veterans Affairs Office of Information and Technology Office of Enterprise Risk Management 1100 First Street, NW Washington, DC 20420	Contracting Activity: Department of Veteran Affairs Office of Acquisition SAC-Frederick 321 Ballenger Center Drive STE 125 Frederick, MD 21703
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*(2) Nature and/or description of the action being approved.*

Justification and approval for 1 specific training course for the Enterprise Risk Management staff from the SANS Institute.

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

The proposed action is for purchase of 1 specific training course for an ERM staff member. The training request has been reviewed and approved by the supervisors and appropriate authorities for the designated staff.

The names of the requestor, names of course, medium of the training, and estimated dates of the training (this is a virtual, On Demand course which can begin at any time) course, and the cost of the individual training is listed in the table below. The total estimated dollar value is \$3880.00 to be added to the original SANS purchase order # VA 119A-14-P-0285.

Training Schedule with Estimated Rates:

Description	Deliverables	Start Date	Estimated End Date	Cost
Training for Carol Lawlor	AUD 507- Auditing Networks, Perimeters and Systems	09/01/2014	09/30/2014	\$3880.00

*(4) An identification of the statutory authority permitting other than full and open competition.*

41 U.S.C. 253(c), FAR 6.302-1 Other Than Full and Open Competition, VAAR 806.3 Competition Requirements.

*(5) A demonstration that the proposed contractor's unique qualifications or the nature of the acquisition requires use of the authority cited.*

The Office of Information and Technology, including IT Workforce Development, has been routinely using this vendor to provide quality training and certifications to IT personnel. The SANS Institute class credits are recognized by the various certifying organizations. SANS Institute has been offering Virtual and On Demand courses for years, making them one of the leaders of such training within the IT community.

This vendor also serves to provide not only the most recent information and techniques to use within IT Information Security, but they also provide a large amount of necessary Continued Education Credits (CEU) so that ERM personnel can maintain current certifications in spite of their volume of work and work-related travel.

While the training courses requested are, for the most part, offered in part by alternate sources, research demonstrated that those sources either do not offer virtual, online training, or the training course agenda does not cover the depth of skill offered by the SANS Institute. Courses spanning 70 hours offered by the SANS Institute were offered by other vendors as 48 hour training. Materials and skills left out of the alternative courses are vital in order to improve competencies within ERM. In addition, shorter courses do not provide necessary CEU's to maintain current IT certifications.

The SANS Institute is geared toward providing training to Federal IT Analysts. They provide the relevant information, supplemental documents, and skills that specifically address federal IT security concerns in a complete and comprehensive manner not provided by other training vendors.

*(6) A description of efforts made to ensure that offers are solicited from as many potential sources as is practicable, including whether a notice was or will be publicized as required by Subpart 5.2 and, if not, which exception under 5.202 applies.*

In accordance with FAR 5.2 a notice of intent was posted to FBO on June 16, 2014. Interested vendors were invited to submit a capabilities statement by June 19, 2014. By the closing date and time, two vendors had expressed an interest in the requirement. The capabilities statements and website information of the vendors was provided to Mr. Gabriel Duncan and Mr. Richard Thompson. Mr. Thompson reviewed the two vendors and found that Mile2 and Milli Micro Systems were not equivalent to the SAN Training.

Mr. Thompson stated that Milli Micro Systems did not seem to offer the courses that the ERM personnel required. There was also no schedule available on the vendor's website to determine if ERM personnel schedules would be compatible.

Mr. Thompson stated that Mile2 seems to have similar courses; however, the personnel taking the the course has certifications that require them to take a certain number of training hours with an accredited organization that the certifying organization recognizes. There is no way to determine in the short time frame available if Mile2 credits would be recognized by a certifying organization. Also, according to the Mile2 website, the course kit (books) cost is separate from the course cost. This would increase the cost of each one of Mile2 courses. SANS books are part of the tuition.

*(7) A determination by the contracting officer that the anticipated cost to the Government will be fair and reasonable.*

The SANS Institute pricing is in line with those offered to the public and in accordance with the website's listed prices.

*(8) A description of the market research conducted (see Part 10) and the results or a statement of the reason market research was not conducted.*

IAW FAR Part 10, market research was conducted by posting the Notice of Intent/Sources Sought to FBO. No other training was found that offers the same relevant information, supplemental documents, and skills that specifically address federal IT security concerns in a complete and comprehensive manner.

*(9) Any other facts supporting the use of other than full and open competition.*

No other facts.

*(10) A listing of the sources, if any, that expressed, in writing, an interest in the acquisition.*

Mile2  
Milli Micro Systems

*(11) A statement of the actions, if any, the agency may take to remove or overcome any barriers to competition before any subsequent acquisition for the supplies or services required.*

The Enterprise Risk Management office will continue to monitor the market for additional training vendors for their employees to achieve training and CPE hours. ERM staff will reach out to vendors identified in this sources sought to determine if and how they may be able to meet requirements in the future.

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*(12) Contracting officer certification that the justification is accurate and complete to the best of the contracting officer's knowledge and belief*

I certify this justification is accurate and true to the best of my knowledge.

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