



U.S. Department
of Veterans Affairs

JUSTIFICATION AND APPROVAL FOR LIMITING SOURCES

1. AGENCY AND CONTRACTING ACTIVITY:

The U.S. Department of Veterans Affairs (VA)
Office of Acquisition Operations (OAO)
Strategic Acquisition Center (SAC) Frederick,
321 Ballenger Center Drive, Suite 125
Frederick, MD 21703

2. NATURE AND/OR DESCRIPTION OF THE ACTION BEING APPROVED:

The proposed action is a six (6) month, firm-fixed price task order to provide Dun & Bradstreet, Inc. (DNBi) subscription reports. This effort is being conducted in accordance with the Multiple Award Schedule (MAS) program; the proposed effort will be awarded under the General Service Administration (GSA)/ Federal Supply Schedule (FSS) Financial and Business Solutions Schedule 520 and special item number (SIN) 520-16, GS-22F-9614D to Dun and Bradstreet, Inc. (DNB), 4350 North Fairfax Drive, Suite 650, Arlington, VA 22203.

3. DESCRIPTION OF SUPPLIES OR SERVICES REQUIRED (INCLUDING THE ESTIMATED VALUE):

The Office of Small and Disadvantaged Business Utilization (OSDBU) provides numerous outreach services for Veterans and service-disabled Veterans who seek to open or expand a business. OSDBU is the verification authority, as designated by statute 38 U.S. Code 8127(f) entitled "Database of Veteran-Owned Businesses", with responsibility for investigating and adjudicating the background of applicants to determine their eligibility as a Service-Disabled Veteran-Owned Small Business (SDVOSB) or a Veteran-Owned Small Business (VOSB).

OSDBU must verify that any company claiming Veteran owned status is actually owned and controlled by Veterans. IAW 38 U.S. Code 8127(f)(5), OSDBU is responsible for maintaining a database and the database shall be made available to all Federal departments. In addition, VA contracting offices must ensure, prior to award of any contract, that all companies bidding for VOSB or SDVOSB set-asides are listed in VA's database of verified contractors. The database is known as Vendor Information Pages (VIP) and is a component of the current VetBiz Case Management System (VCMS) which is the phase where the actual verification process is conducted by the Center for Verification and Evaluation (CVE). The VIP/VCMS collects and displays information on all known small businesses that have been verified as SDVOSBs or VOSBs.

This process uses the Data Universal Numbering System (DUNS) to uniquely identify

and link records across acquisition and financial management systems, uncover ownership relationships among companies and can enable the VA to have the most complete and accurate view of an entity.

Such robust company data provides predictive multi-dimensional risk scores to allow insights not only into supplier financial and operational stability, but the authoritativeness of data on which that score is generated. Additionally, aggregate data on federal awards; as made available through all Federal, State and Local government sources is essential. This data provides specific details about business relationships the company may have with the Federal government including Federal Employer Identification Number (FEIN), contracts, grants, loans, and debts owed to the Federal Government. Lastly, in order to aid in this effort, OSDBU requires assurance that the data is complete, accurate and the most current in order to ensure a comprehensive quality assurance process.

VA had access to DNB reports that provided all the necessary information until the contract expired on June 30, 2014. OSDBU has identified a need for continued access to DNB reports. Access to these reports will ensure OSDBU can continue operations without suffering a core mission failure. [REDACTED]

4. STATUTORY AUTHORITY AND RATIONALE SUPPORTING USE OF THE AUTHORITY CITED:

IAW statutory authority 40 U.S.C. § 501(b)(2)(A) "Services for Executive Agencies" which grants direct acquisition authority under the MAS Program and as prescribed in FAR 8.405-6(a)(1)(i)(B) "[o]nly one source is capable of providing the services required at the level of quality required because the services are unique or highly specialized," the requested actions are legally authorized and permissible.

Use of the cited authority is appropriate because DNB is the only source capable of providing these unique reports. Awarding to any other source would result in the following:

- a. An inability to fulfill the agency's requirements since the successor contract does not provide the required report content. The single, comprehensive report provided by the successor contract is not comprehensive enough to verify that a business' executive structure is owned and controlled by a Veteran, nor can it aid in determining the overall composition of a firm.
- b. OSDBU would not have access to an element critical to verification of business status. During the CVE process, verified vendors must be linked to their DUNS number within the VIP portal. The DUNS number has been, and continues to be the U.S. Government standard for company identification, and is integrally linked in Federal Procurement Policy. The successor contract does not have access to the DUNS information as that is proprietary to DNB. OSDBU is under continued reliance on the DUNS and other DNB data elements to ensure continuous monitoring, fraud reduction, risk mitigation and accurate contractor adjudications in

order to sustain mission capabilities.

5. DETERMINATION THAT THE ORDER REPRESENTS BEST VALUE CONSISTENT WITH FAIR & REASONABLE PRICING:

IAW FAR 8.404(d), GSA has already determined prices of supplies and services offered at fixed-prices, as well as services offered at hourly rates, under schedule contract to be fair and reasonable. The procured services are reports from DNB, as outlined in its GSA schedule, with fixed prices. Therefore, the ordering activity is not required to make a separate determination. A discount off published pricing will be pursued.

6. DESCRIPTION OF MARKET RESEARCH CONDUCTED:

IAW FAR Part 10, market research was conducted by the Requesting Service to determine most suitable approach to acquiring the services. A review the successor contract and commercially available products revealed that no other sources have Dun & Bradstreet patented database.

7. OTHER SUPPORTING FACTORS:

Within 14 days after placing an order, a notification of contract action will be placed in accordance with FAR 5.301; and a limited source justification will be posted as required per FAR 8.405-6.

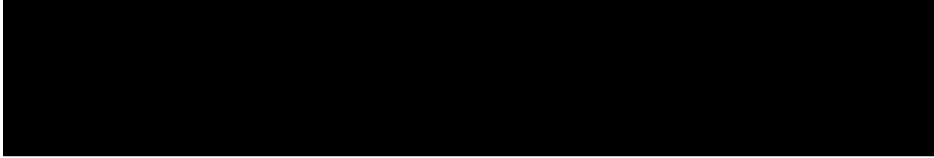
8. ACTIONS NECESSARY TO OVERCOME ANY BARRIERS TO COMPETITION:

Market Research will continue to be conducted to determine if another source is capable of providing the services required by the VA.

CERTIFICATIONS

9. TECHNICAL REQUIREMENTS CERTIFICATION:

I certify that the supporting data under my cognizance, which are included in this justification, are accurate and complete to the best of my knowledge and belief.



10. ORDERING ACTIVITY CONTRACTING OFFICER CERTIFICATION:

I certify that the justification is accurate and complete to the best of my knowledge and belief. As this action does not exceed \$650,000, the certification below required by FAR 8.405-6(d)(1) serves as approval.

