

JUSTIFICATION  
FOR AN EXCEPTION TO FAIR OPPORTUNITY

1. Contracting Activity: Department of Veterans Affairs (VA)  
Office of Acquisition Operations  
Technology Acquisition Center  
23 Christopher Way  
Eatontown, New Jersey 07724
2. Description of Action: The proposed action is for a firm-fixed-price delivery order to be issued under the National Aeronautics and Space Administration (NASA) Solutions for Enterprise-Wide Procurement (SEWP) V Governmentwide Acquisition Contract (GWAC) for SafeNet Authentication Manager user licenses, SafeNet MobilePASS One-Time Password (OTP) licenses, and associated SafeNet 1 Year Care.
3. Description of Supplies or Services: VA, Office of Information and Technology, Information Security, Office of Cyber Security (OCS), has a requirement for SafeNet Authentication Manager user licenses, SafeNet MobilePASS OTP licenses, and associated SafeNet 1 Year Care for VA's current authentication infrastructure. SafeNet Authentication Manager user licenses and SafeNet MobilePASS OTP licenses are currently used by VA personnel and contractors to ensure a secure authentication mechanism to log into VA interconnected information systems for administrative functions. These additional licenses are to provide two-factor authentication and secure OTP to VA's Citrix Access Gateway (CAG) users, ensuring that only properly authenticated users are authorized access to critical applications and data. Two-factor authentication is the process by where an end user can either authenticate against the CAG with their Personal Identity Verification card or with their Active Directory username/password plus an OTP authenticator. The SafeNet MobilePASS OTP software provides for secure usage for VA's mobile devices. The SafeNet 1 Year Care shall provide for all Original Equipment Manufacturer upgrades, patches, fixes, updates and security resolutions developed by SafeNet. The period of performance is 12 months for the SafeNet 1 Year Care. The subject software licenses shall be delivered within 30 days of award. The total price of the proposed action is **REDACTED**.
4. Statutory Authority: The statutory authority permitting this exception to fair opportunity is Section 41 U.S.C 4106(c)(2) as implemented by Federal Acquisition Regulation (FAR) 16.505(b)(2)(i)(B) entitled, "Only one awardee is capable of providing the supplies or services required at the level of quality required because the supplies or services ordered are unique or highly specialized."
5. Rationale Supporting Use of Authority Cited: Based on market research, as described in section 8 of this justification, it was determined that limited competition is available among authorized resellers of the required SafeNet brand name

licenses and services. VA requires the procurement of additional SafeNet Authentication Manager licenses and SafeNet MobilePASS OTP licenses due to an increase in the number of end users requiring two-factor authentication and secure OTP. VA's current authentication infrastructure consists of only SafeNet Authentication Manager and SafeNet MobilePASS OTP licenses, and VA has exclusively deployed and is currently exclusively using SafeNet Luna hardware security modules as well as SafeNet Token Pro for Universal Serial Bus smart cards and OTP devices. No other authentication license is compatible or interoperable with VA's existing configured and customized SafeNet authentication infrastructure due to SafeNet's proprietary database structures, protocols, and software application programming interfaces. Specifically, use of a different vendor's software will not communicate with the current SafeNet infrastructure due to proprietary constraints. The Government has made a significant investment in its current SafeNet authentication infrastructure platform. If another authentication platform were to be deployed, it would have to go through a lengthy configuration and customization process, resulting in extensive end user disruptions and delays, would still not be interoperable or compatible with the current infrastructure, and would require a duplication of cost that would not be recovered through competition. VA's SafeNet infrastructure, consisting of SafeNet Authentication Manager licenses and SafeNet MobilePASS OTP licenses, is a proprietary integrated solution that is the only two-factor authentication and secure OTP that meets the Government's requirement to integrate into the existing infrastructure. Additionally, the required SafeNet 1 Year Care must be provided by SafeNet through an authorized reseller. Specifically, without access to SafeNet's proprietary source code, no other source is able to provide software upgrades, patches, fixes, updates or security resolutions which is required as a part of the maintenance.

6. Efforts to Obtain Competition: Market research was conducted, details of which are in section 8 of this justification. This effort did not yield any additional sources that can meet the Government's requirements. It was determined that limited competition is viable among authorized resellers of the required SafeNet Authentication Manager licenses, SafeNet MobilePASS OTP licenses, and associated SafeNet 1 Year Care. In accordance with Federal Acquisition Regulations 5.301 and 16.505(b)(2)(ii)(D), the award notice for this action will be synopsisized and this justification made publically available on the Federal Business Opportunities page within 14 days after award. Additionally, this justification shall be posted with the solicitation on the NASA SEWP V GWAC website to notify interested parties.
7. Actions to Increase Competition: In order to remove or overcome barriers to competition in future acquisitions for this requirement, the Government's technical experts will continue to perform market research to determine if there are emerging products available that will enable future requirements to be competed.
8. Market Research: Market research was conducted by VA's OCS technical experts in August 2015 by searching the websites of the only other two-

factor authentication and secure OTP product manufacturers, HID Global and Envoy Data Corporation. The Government's technical experts determined that neither of these products could meet the interoperability and compatibility requirements with the existing SafeNet infrastructure as stated in paragraph 5 of this justification. Additionally, based on reviews of these companies' products and services offered, the Government's technical experts determined that neither of these sources can meet the Government's requirement to provide the two-factor authentication and secure OTP product licenses without the aforementioned proprietary source code. Each software developer offers a proprietary system and associated services that will only operate with its respective hardware and software. The market research revealed that only SafeNet, or authorized SafeNet resellers, would be capable of meeting VA's requirements. Only SafeNet certified software is compatible and can be integrated into proprietary SafeNet systems. Additionally, the required SafeNet 1 Year Care support must be provided by SafeNet or an authorized reseller.

Additional market research was conducted in September 2015 by utilizing the NASA SEWP V GWAC Quick Request for Information Tool. It was determined that there were several NASA SEWP V GWAC holders that are authorized resellers that can provide the required SafeNet brand name licenses and services.

9. Other Facts: None