

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, NJ 07724
2. Description of Action: The proposed action is for a firm-fixed price delivery order (DO) issued under the National Aeronautics and Space Administration (NASA) Solutions for Enterprise-Wide Procurement (SEWP) V Government-wide Acquisition Contract (GWAC) for renewal of enterprise-wide software maintenance and support services for brand name CA Technologies, Inc. (CA) Identity and Access Management (IAM) software product licenses.
3. Description of the Supplies or Services: VA, Office of Information and Technology, Enterprise Project Management Office (EPMO), has a requirement for the renewal of enterprise-wide maintenance and support services of eighteen existing brand name CA Technologies IAM software licenses used by VA for its IAM software solution and Personal Identity Verification (PIV) services. VA uses customized unlimited user CA Technologies IAM software for identity administration and real-time authentication enforcement. This IAM software solution addresses VA's requirements for create, modify, and delete functions in the administration of network user accounts, user profiles, and access policies across the heterogeneous VA information technology environment via a combination of user roles and business rules. Furthermore, this IAM software provides for the capability to abstractly and automatically correlate data and support centralized management of user identities, where administrative roles and user roles can selectively adjust identity relationships and identity trails for entities or groups. In addition, this software supports monitoring of decentralized events that relate to network user identities, where end points are monitored for identity related adjustments and those monitored events are then reported to the centralized component of the software as an input to determine any subsequent changes that may be required in the scope of network user identity lifecycle management. The required software maintenance consists of all standard upgrades, patches, fixes, updates, and security resolutions developed by CA. Support services provide analysis, troubleshooting, and resolution of any software product-related problems or questions encountered by Government users. Overall, these maintenance and support services will ensure the current software is continually updated and remains fully operational. The period of performance for this effort will consist of one 12 month base period with two 12-month option periods. The total estimated price of the proposed action, inclusive of options is \$ [REDACTED]
4. Statutory Authority: The statutory authority permitting an exception to fair opportunity is Section 41 U.S.C. 4106(c)(2) as implemented by the Federal Acquisition Regulation (FAR) Subpart 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 of highly specialized."

5. Rationale Supporting Use of Authority Cited Above: Based upon market research as described in section eight below, it has been determined that limited competition is available among authorized resellers of the required brand name CA Technologies software maintenance and support services. Only CA Technologies, Inc. or an authorized reseller can perform the software maintenance and support services for the existing proprietary CA Technologies software licenses in use across the VA enterprise. More specifically, access to the code is required to ensure the services provided on these items are properly configured and no other contractors are able to perform required upgrades, patches, fixes, updates, or security solutions. Without renewal of the required software maintenance and support services, the existing CA Technologies software performance would rapidly degrade and would eventually be unusable by VA as its IAM software solution. Additionally, VA would not receive needed security updates, which would compromise VA's network security posture. Further, since the CA software is proprietary, no third party source exists that provides integration, analysis, troubleshooting, and resolution of any software product-related problems other than CA Technologies, Inc. or an authorized reseller. The use of any other IAM software product would severely degrade VA's ability to support and manage the existing IAM capability which would result in interoperability and compatibility issues. IAM software solutions from any other vendors would require an extensive and complex redesign, development, and integration of a new VA enterprise-wide IAM software solution. The impact would be a complete redesign of the VA IAM and PIV solution which would take at least a year to complete and require substantial investment in new software that wouldn't be recovered through competition. Additionally, the current IAM software would still need to be operational and available while redesigning the new system resulting in unnecessary cost duplication, potential system downtime, and/or loss or degradation of data during system migration. In addition, any alternate system would also likely be proprietary requiring source code(s) for maintenance and support and not result in any operational improvements or cost avoidance.

6. Efforts to Obtain Competition: Market Research was conducted, details of which are in section eight of this justification. This effort did not yield any additional sources that can meet the Government's requirements. It was determined however that limited competition is viable among authorized resellers for the required brand name CA software maintenance and support who are NASA SEWP V GWAC holders. In accordance with FAR 5.301 and 16.505(b)(2), notice of award for this action will be synopsisized on the Federal Business Opportunities Page (FBO) within 14 days of award along with a copy of this justification. Additionally, this justification will also be posted with the solicitation on the NASA SEWP V website for review by prospective offerors.

7. Actions to Increase Competition: The Government will continue to conduct market research, review, and revalidate its requirements as IAM software solution systems continue to evolve. The Requiring Activity will continue to monitor whether

alternate software licenses and software maintenance support services emerge that can meet VA's needs.

8. Market Research: Market research was conducted by Government technical experts in February 2017 via internet research and review of industry publications to ascertain the ability of any source other than CA Technologies or CA Technologies' authorized resellers that could provide the required software maintenance and support services. This market research revealed that while [REDACTED]

[REDACTED], and [REDACTED] all offer similar IAM software solutions, none could meet VA's requirement because these contractors cannot access the source code(s) and technical data of the VA's current proprietary CA Technologies IAM solution. Further, CA Technologies only provides their software source keys to their designated authorized resellers. Unauthorized software providers and non-approved CA Technologies vendors do not have access to the proprietary data and required source codes of the software in order to provide CA Technologies software maintenance and support. Only CA Technologies or authorized resellers have access to the proprietary source code specific to the maintenance for this particular software.

Further market research was conducted from February 2 through 22, 2017 using the Market Research Tool on the NASA SEWP V GWAC website [REDACTED] under North American Industry Classification Code (NAICS) 541519 for the required CA Technologies software maintenance and support. Four GWAC holders responded including one from Group A (Original Equipment Manufacturers and Value Added Resellers (VARs)); one from Group C (Small Business VARs); and two from Group B(2) (Service-Disabled Veteran-Owned Small Business (SDVOSB) VARs). The Contract Specialist conducted additional market research by utilizing the Provider Lookup tool on the SEWP website on March 20, 2017. The results revealed 14 SDVOSBs under Group B(2) who are authorized resellers of CA Technologies software and associated maintenance and support. The Contract Specialist searched the Vendor Information Pages (VIP) database (www.vip.vetbiz.gov), and 12 of the 14 Group B(2) GWAC holders are verified SDVOSBs. Therefore, limited competition is anticipated among the NASA SEWP V GWAC holders in Group B(2) for the requirements described herein.

9. Other Facts: None.

10. Technical and 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.

[Redacted]

Project Manager

Date: 3/29/2017

Signature: [Redacted]

3/29/2017

11. Fair and Reasonable Cost Determination: I hereby determine that the anticipated price to the Government for this contract action will be fair and reasonable based on anticipated competition and discounts among NASA SEWP V GWAC resellers of the required brand name CA Technologies software maintenance and support renewals. Additionally, catalog pricing for SEWP V GWAC holders has already been determined by NASA to be fair and reasonable. Finally, price analysis shall be conducted by comparing the successful quotation with the independent government cost estimate.

[Redacted]

Procuring Contracting Officer

Date: 3/29/2017

Signature: [Redacted]

12. Procuring Contracting Officer Certification: I certify that this justification is accurate and complete to the best of my knowledge and belief.

[Redacted]

Procuring Contracting Officer

Date: 3/29/2017

Signature: [Redacted]

13. Legal Sufficiency Certification: I have reviewed this justification and find it adequate to support other than full and open competition and deem it legally sufficient.

[Redacted]

Legal Counsel

Date: 3/29/2017

Signature: [Redacted]

Approval

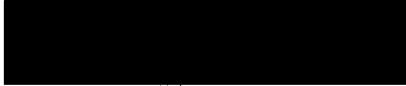
In my role as the Advocate for Competition, based upon the foregoing justification, I hereby approve the acquisition of CA Technologies Identity Access Management software maintenance and support services on an other than fair opportunity basis pursuant to the statutory authority cited in section four herein, subject to availability of funds, and provided that the services herein described have otherwise been authorized for acquisition.

Date: 3-30-17

Signature:



Advocate for Competition



CA Technologies Software Maintenance & Support Services - Control Number TAC-17-39020

Justification for an Exception to Fair Opportunity
Coordination Matrix

<i>Kevin R. Loesch</i>	<i>3/29/2017</i>	<u>Concur/Non-Concur</u>
Kevin R. Loesch	Date	
Director, Procurement Services B		
Technology Acquisition Center (003B2B)		
Office of Acquisition Operations		
Department of Veterans Affairs		