

SOLE SOURCE JUSTIFICATION

1. Contracting Activity: Department of Veterans Affairs (VA)
Office of Acquisition Operations
Technology Acquisition Center
1701 Director's Blvd.
Austin, TX 78744
2. Description of Action: This proposed action is for a sole-source, firm-fixed price purchase order to the International Association of Privacy Professionals (IAPP) for Level V Group Membership.
3. Description of Supplies or Services: The requirement is for annual IAPP Membership Level V Subscription for up to 500 employees, to include a 12-month base period and four 12-month options periods. IAPP allows for VA employees to maintain their certification in privacy and security related duties, and compliant with federal privacy and security laws. This membership will also provide opportunities for an exchange of best practices between both the Federal and the private sector privacy and security professionals. [REDACTED]
4. Statutory Authority: In accordance with Federal Acquisition Regulation (FAR) 13.106-1(b)(1)(i), "Contracting officers may solicit from one source if the contracting officer determines that the circumstances of the contract action deem only one source reasonably available..." for purchases not exceeding the simplified acquisition threshold.
5. Rationale Supporting Use of Authority Cited Above: The proposed source for this acquisition is IAPP. VA Privacy and Information Security personnel are required to take continuous education in Privacy and Information Security on an annual basis to maintain certifications and compliance with the Federal Information Security Management Act (FISMA). The Certified Information Privacy Professional (CIPP) Professionals Certification Program is the only Certified Privacy Professional program currently offered for Privacy and Information Professionals. IAPP is the only source providing the CIPP accreditation
6. Efforts to Obtain Competition: Recent market research conducted, detailed in paragraph eight of this document, has confirmed that no additional sources have emerged that can meet the Government's requirements without the need for multiple procurements or an undetermined amount of customization to one or more commercial products. There is no competition anticipated for this acquisition. In accordance with FAR 5.301 this action will be synopsisized on the Federal Business Opportunities Page (FBO) and the justification will be made publicly available.
7. Actions to Increase Competition: The Government will continue to conduct market research to ascertain if there are changes in the market place that would enable competition in future actions.

International Association of Privacy Professionals (IAPP) Level V Membership Subscription

8. Market Research: VA technical personnel conducted market research in January 2017. Market research was performed utilizing the internet in search of organizations providing membership and certification in privacy and information security. As a result, Global Knowledge and Association of Records Managers and Administrators (ARMA) provide the CIPP Components of the training program (Jurisdictional laws, regulations and enforcement models/rules and standards in your domain; Essential privacy concepts and principles and Legal requirements for handling and transferring data), but the CIPP certification is offered exclusively by the International Association of Privacy Professionals (IAPP). In addition, Logical Operations Inc. offers the CIPP Training, but the certification is also through IAPP. Searches on Acquisition Contracts and other related websites pertaining to privacy determined that the IAPP Professional Certification Process is the only certification process currently offered for Privacy Professionals and is only offered through this organization. IAPP is responsible for developing the CIPP credentialing program and certification.

In April 2017, the contract specialist conducted market research using web searches, and by searching for resellers on National Aeronautics and Space Administration Solutions for Enterprise Wide Procurement (SEWP) V Government Wide Acquisition Contract, and General Services Administration (GSA) Federal Supply Schedule. Searches for IAPP subscription providers on SEWP and GSA did not yield any results.

9. Interested Sources: NA