

## **JUSTIFICATION FOR USE OF LIMITED SOURCES UNDER FAR 8.405-6 – LOGICAL FOLLOW-ON**

Upon the basis of the following Justification and Approval, the proposed contract described below may be established through other than full and open competition pursuant to the authority of FAR 8.405-6(a)(1)(i)(C)

**Responsibility for Contracting Action:** The VBA Services Contracting Team is responsible for the contracting action as described herein.

**Purpose of Contracting Action:** Atlas Research LLC, a Large Business, was awarded a contract for the Project Management Support for the implementation of the Harry W. Colmery Veterans Educational Assistance Act of 2017 (Forever GI Bill) on September 28, 2017. At the time of this contract award, Atlas Research LLC was identified as a Service-Disabled Veteran-Owned Business (SDVOB). A search of VetBiz and SAM websites now show that this contractor is no longer listed as an SDVOB under the NAICS 541611, Administrative Management and General Management Consulting Services. This contract provides support to EDU in the areas of Information Technology (IT), Communications, Operations/Training, Policy/Regulation, and VET TEC. Initially the Contractor and VBA identified that the required tasks of this contract could be met and completed within a 12-month period. However, in July of 2018, the Program Office reached out to the Contracting officer, requesting an additional 6 months of extended service. A review of the awarded task order revealed that the FAR Clauses 52.217-8 nor 52.217-9 were not incorporated into the task order. Discussions between the Program Office and Contracting took place and it was determined that a Logical Follow-On would be the best solution to complete the requirements of this procurement.

**Justification:** The new work is a logical follow-on to an original Federal Supply Schedule order which was placed in accordance with the applicable Federal Supply Schedule ordering procedures. Atlas has provided support throughout Fiscal Year 2018, it is prudent to not compete this requirement, but to keep the current contractor for an additional 6 months (Base) along with an option to extend an additional 6 months. The risk surrounding a recompetes and time necessary for a transition would negatively impact the success of implementing the Forever GI Bill provisions. Two of the three outstanding provisions are new programs for VA to administer, and Atlas has provided significant project management support in starting up the programs through the development of new procedures to process applications and claims, communications to support outreach and Veteran engagement efforts, articulating policy interpretations, and building user stories and business requirements to aid IT.

The proposed action is to provide 6 months (Base) with a 6-month option of continued project management support as EDU continues implementation of the Forever GI Bill.

The Contractor shall provide comprehensive project and program management support services to EDU. The project management support approaches employed by the contractor staff should be consistent with project management best practices, notably those specified by Program Management Institute's PM Body of Knowledge (PMBOK) guide.

The contractor shall assist the Government in implementing disciplined, comprehensive, and flexible program and project management processes, including monitoring of project metrics, rigorous risk management, and prompt reporting on Government-approved cost, schedule, performance, and risk baseline.

This determination is made in accordance with FAR 8.405-6(a)(1)(i)(C) which requires a justification for limiting sources over the micro-purchase threshold. The contract will be firm fixed price. The Government estimate of cost of the procurement is as follows:

The total value of this propose action is \$1,250,000.00; the period of performance is from September 30, 2018 through March 30, 2019, with an additional 6-month option from March 31, 2019 through September 29, 2019 for \$1,250,000.00.

Labor support is up to 15 contractors total from the following categories: Project Management, Communications, Information Technology, Operations/Training, Policy/Regulations and VET TEC.

**Posting Requirement:** Public posting of this award action will be synopsisized via the Government Point of Entry (GPE) in accordance with FAR Section 5.301, along with a copy of the Limited Sources Justification and Approval in accordance with FAR 8.405-6(2)(a).

**Certification of Supporting Data:** The Contracting Officer certifies that the supporting data under my cognizance that are included in this Justification and Approval are accurate and complete to the best of his or her knowledge and belief.

**Determination of Fair and Reasonable Price:** The Contracting Officer determines that the anticipated cost for this contract action will be fair and reasonable. Logical Follow-On pricing for this award will remain the same as what was previously awarded. Contractor has agreed to honor all previously awarded discounts on its labor categories which remains as an approximate 3% cost savings off their GSA pricing. Further review of the pricing initially submitted by the previous bidders during the solicitation phase reveal that their costs have remain similar to what was submitted.

The Contracting Officer certifies that this Justification and Approval Document is accurate and complete to the best of my knowledge and belief.

**Rebecca S. Quilhot**  
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Quilhot 195002  
Date: 2018.09.13 14:30:05 -05'00'

09/13/2018

Rebecca S. Quilhot, VBA Services Contracting Team  
Contracting Officer

(Date)

**Alyssa M. Dark**  
457656

Digitally signed by Alyssa M. Dark  
457656  
Date: 2018.09.13 12:42:54 -07'00'

09/13/2018

Alyssa A, Dark  
Senior Supervisory Contract Specialist

(Date)

**Daniel J. Pagone**  
494370

Digitally signed by Daniel J.  
Pagone 494370  
Date: 2018.09.14 06:24:28 -06'00'

9/14/22018

Daniel J. Pagone  
Deputy Director, Office of Acquisition

(Date)

**David C. Eyre**  
231091

Digitally signed by David C. Eyre  
231091  
Date: 2018.09.14 07:52:10 -04'00'

9/14/2018

David C. Eyre  
Director, Office of Acquisition

(Date)

**Robert M.  
Waltemeyer 713715**

Digitally signed by Robert M.  
Waltemeyer 713715  
Date: 2018.09.14 08:53:53 -04'00'

09/14/2018

Robert M. Waltemeyer  
Head of Contracting Activity

(Date)