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JUSTIFICATION REVIEW DOCUMENT
FAR 13.5 SIMPLIFIED PROCEDURES FOR CERTAIN COMMERCIAL ITEMS
SOLE SOURCE JUSTIFICATION AND APPROVAL

Program/Equipment: The program being procured through Human Resource Certification Institute is independent study materials for personnel in either hardcopy or digital (electronic) format, as well as exam voucher for the student to complete the required certification exam. The materials being purchased are Exam Vouchers and Study Guides (Digital Copy and Hard Copy).

Authority: Simplified Procedures for Certain Commercial Items, Title 41 U.S.C. 1901 as implemented by FAR 13.5.

Amount: \$1,264,374.00

Prepared by:

[REDACTED]
[REDACTED]
Email: [REDACTED]

[REDACTED]
Date: 17 August 2023

Contracting Officer:

[REDACTED]
[REDACTED]
Email: [REDACTED]

DSN: [REDACTED]
Date: 31 August 2023

Technical:

[REDACTED]
[REDACTED]
Email: [REDACTED]

[REDACTED]
Date: 31 August 2023

Requirements:

[REDACTED]
[REDACTED]
Email: [REDACTED]

[REDACTED]
Date: 31 August 2023

[Redacted]

[Redacted]

Reviews: I have reviewed this justification and find it adequate to support other than full and open competition.

[Redacted]

DSN: [Redacted]

Date: [Redacted]

[Redacted]

DSN: [Redacted]

Date: [Redacted]

[Redacted]

DSN: [Redacted]

Date: [Redacted]

[Redacted]

DSN: [Redacted]

Date: [Redacted]

[Redacted]

**FAR 13.5 Simplified Procedures for Certain Commercial Items
Sole Source Justification and Approval**

1. Contracting Activity: U.S. Army Mission and Installation Contracting Command (MICC)-Fort Jackson, 4340 Magruder Avenue, Fort Jackson, South Carolina 29207.

2. Description of Action: The U.S. Army, Soldier Support Institute, requests approval for one (1) new Blanket Purchase Agreement (BPA) with Human Resource Certification Institute (HRCI). This is a Non-Funded Agreement. The Soldier Support Institute will use the Government Purchase Card as the method of payment for the individual calls issued under the BPA.

3. Description of Supplies/Services: The Human Resource Certification Institute (HRCI), is a comprehensive certification preparation program that includes modules and online study tools. HRCI certification provides individuals with competency based professionally relevant credentials that are highly valued in human resource communities. The products are accredited and meet the National Commission for Certifying Agencies rigorous standards. HRCI is the only program that provides Associate Professional in Human Resource (aPHR) certification, which is available and applicable for junior Solders.

Period of Performance:

Base Year:	29 SEPT 2023 to 28 SEPT 2024	Value: \$421,458.00
Option Year 1:	29 SEPT 2024 to 28 SEPT 2025	Value: \$421,458.00
Option Year 2:	29 SEPT 2025 to 28 SEPT 2026	Value: \$421,458.00

Total Value: \$1,264,374.00

4. Authority Cited: Simplified Procedures for Certain Commercial Items, Title 41 U.S.C. 1901 as implemented by FAR Subpart 13.5 for sole source.

5. Reason for Authority Cited:

a. Market research was conducted by the end user to locate a company that could provide junior, mid, and senior level Human Resource certifications. The only company that was able to provide all three was the Human Resource Certification Institute (HRCI). These certifications are also the industry standard certifications required for Army Human Resource (HR) professionals. Those certifications are as follows: Associate Professional in Human Resources (aPHR), Professional in Human Resources (PHR), and Senior Professional in Human Resources (SPHR). HRCI has developed the preparatory materials and exams for these certifications. The information for the HR Credentialing Certifications is registered, trademarked, proprietary, and determined commercial in nature. A letter certifying proprietary rights and authorization has been provided by HRCI. Market research has shown that there are potential

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companies that could provide some of the materials required for the HR Credentialing Program. However, further market research found HRCI is the only company that provides the final exams to complete the certifications for the United States Military HR Credentialing Program.

b. Alternatives. At least three (3) other companies or institutions offer the same HR Credentialing Program. However, each of these companies relies upon HRCI as the source to supply the required training material. After the completion of a course, these vendors report back to HRCI to administer the exams for the certification. An additional lead time of 30 days that would be needed by going through a third-party vendor to respond to an unscheduled change in the amount of training materials required, could affect the funding and resources provided if the materials were not received in a timely manner as Soldiers need them to prepare for the testing requirements.

c. Impact if justification not approved. Failure to approve this justification would increase lead times to an unacceptable level. The increased lead time for the delivery of materials from a third party would negatively impact the soldier's ability and likelihood of successfully completing the credentialing program. Without obtaining these qualifications, the Soldier's level of readiness suffers and further progress in the HR career field is impeded. This would result in preventing Soldiers from gaining additional operational experience in a timely manner so they can be most effective in the fast-changing operational environment.

6. Efforts to Obtain Competition: As part of market research, a sources sought notice was posted on <<https://sam.gov/>> on 12 June 2023 to determine the availability, and capability of interested small business sources. Three vendors responded to the notice: PTG International; Rapier Solutions Inc.; and Southern Force Educational Services, LLC. They all failed to provide any supporting documents to demonstrate their capability to perform this requirement. As such, competition is not likely to be obtained.

a. Effective competition Based on market research; the Government does not anticipate effective competition.

b. Subcontracting competition. A subcontracting plan is not required for Blanket Purchase Agreements (BPA).

7. Actions to Increase Competition: The Government will continue to conduct market research to determine whether viable sources capable of providing the full requirement become available to the public, thus providing better value to the Government.

8. Market Research: Market Research has indicated that this requirement meets the definition of a commercial item as defined in FAR 2.101, therefore FAR Part 12, Acquisition of Commercial Items and FAR Part 13, Acquisition for Supplies and Services will be applied. IAW FAR Part 19.203(c) for acquisitions of supplies and services that have an anticipated dollar value exceeding the simplified acquisition

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threshold, the contracting officer shall first consider an acquisition for the small business socioeconomic contracting programs (i.e., 8(a), HUBZone, SDVOSB, or WOSB programs), before considering a small business set aside. However, if a requirement has been accepted by the SBA under the 8(a) Program, it must remain in the 8(a) Program unless the SBA agrees to its release in accordance with 13 CFR parts 124, 125, and 126. As found in Paragraph 9 below through the sources sought notice, the Government has found three (3) small business that could have the potential to support Soldier Support Institute's (SSI) Adjutant General's School's (AGS) Credentialing Program. However, after an evaluation of the capability statements by SSI, all three (3) were found incapable of supporting this requirement (See results in Paragraph 9). Further research was performed to support FAR 8.002, Priorities for use of Mandatory Government Sources. The results from the research have found all four mandatory sources with no capabilities to supply the required materials to support SSI's Credentialing Program.

9. Interested Sources: A sources sought for solicitation W9124C23R0017 AGS, HR Credentialing was posted on SAM.gov from 12 June 2023 until 30 June 2023. The table below shows the potential vendors that responded to the notice. The Soldier Support Institute performed an evaluation of capability statements submitted by these three (3) vendors on 10 July 2023. The results from the evaluation found two of the capability statements with no confidence and the last vendor's capability statement was evaluated with satisfactory confidence to support the customer's requirement. However, the last respondent's statement did not display the capabilities that the Soldier Support Institute was looking for to support the requirement when compared to the Army Universities ACCESS program that is aligned with supporting the General's Credentialing Program. Therefore, all three (3) vendors were found incapable of supporting the SSI/AGS's Human Resource Credentialing Program.

Offeror	Socioeconomic	Cage Code	SAM Registered	Active Exclusions	Bonding Capacity (Single/Aggregate)
PTG International, Inc	8(a) Certified	46E33	Yes	No	Zero Dollar for Single and Zero Dollar for Aggregate--100% Service
Rapier Solutions, Inc	Minority Owned, Self Certified Small Disadvantaged, Veteran Owned, Black American Owned, and Service-Disabled Veteran Owned Small Business	34QV9	Yes	No	Zero Dollar for Single and Zero Dollar for Aggregate--100% Service
Southern Force Educational Services, LLC	Self Certified Small Disadvantaged, Woman, Veteran Owned, Service-Disabled Veteran Owned and Hispanic Owned Small Business	9E7N3	Yes	No	Zero Dollar for Single and Zero Dollar for Aggregate--100% Service

10. Other Facts:

a. Procurement history. The Government reviewed previous awarded contracts that were similar or the same to the Soldier Support Institute Adjutant General's School's new requirement and they are captured in the following table.

Contractor	Contract Number	Award Amount	Small Business	Competitive Status	Award Date	Description
Human Resource Certification Institute (HRCI)	W9124C22A0002	\$197,745.00	Non-Profit	Sole Source	12-May-22	Human Resource Credentialing Program
Enrichment Bookstore & Art Center (HRCI)	W9124C22A0001	\$250,000.00	EDWOSB	Full and Open	11-Jan-22	Finance and Comptroller Certification
Association of Government Accountants (AGA)	W9124C18A0004	\$166,000.00	Large Business	Full and Open	16-Jul-18	Certified Government Financial Manager Certification

b. other facts. The Government gathered other facts to support the justification for limiting competition.

Human Resource Certification Institute (HRCI) supports the Military Human Resource (HR) Personnel with their Certifications and Recertifications. It is mandatory for Military Personnel to receive their HR Certifications to support their career. HRCI's Credentialing Program is the main source to execute and finalize the exams for HR Certification. HRCI helps bridge the Gap between Military and Civilian HR Leadership by easing the transition from Military to Civilian with training and certification for Associate Professional in Human Resources (aPHR), Professional in Human Resources (PHR), and Senior Professional in Human Resources (SPHR). HRCI is the only institute that offers exams for aPHR, PHR, and SPHR for certification and recertifications.

HRCI submitted a letter on 2 May 2022, to the Mission Installation Contracting Command located at Fort Jackson to validate they are the only supplier that supplies the materials for the aPHR, PHR, and SPHR Certifications. HRCI's comment in their letter stated "Yes, HRCI is the only company authorized to administer the exams and provide the certifications for these programs. HRCI has contracted with an external vendor, Pearson Vue, to provide the test delivery".

As a result, from the aforementioned information above, it is in the Government's best interest to award one (1) Blanket Purchase Agreement to Human Resource Credentialing Institute as the sole supplier of SSI's Adjutant General School's (AGS) material for the Human Resource Credentialing Program.

[REDACTED]

[REDACTED]

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

[REDACTED]

Date: [REDACTED]

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

[REDACTED]

Date: [REDACTED]

13. Fair and Reasonable Cost Determination: As contracting officer, I hereby determine that the anticipated cost to the Government for this contract action will be determined fair and reasonable. Based upon this determination from comparing historical prices paid, whether by the Government's Independent Government Cost Estimate (IGCE) or other Affiliates, for the same or similar items in accordance with FAR 15.404-1(b)(2)(ii). However, even though SSL's new requirement does exceed the threshold for Certified Cost or Pricing data, it will not be obtained as the result of market pricing. In accordance with FAR 15.403-4(a)(1) this requirement is below the \$2 million threshold for obtaining certified cost or pricing data.

[REDACTED]

Date: [REDACTED]

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

[REDACTED]

Date: [REDACTED]

[REDACTED]



Approval

Based on the foregoing justification, I hereby approve the procurement of the Human Resource Credentialing Program on a sole source basis pursuant to the authority of the Simplified Procedures for Certain Commercial Items, Title 41 United States Code Section 1901 as implemented by Federal Acquisition Regulation 13.5. The estimated ceiling value of the blanket purchase agreement is \$1.26 million for a 3-year period of performance consisting of a base year and two option years, from approximately September 2023 through approximately August 2026. The approval is subject to availability of funds, and provided that the services or supplies herein described have otherwise been authorized for acquisition.



SCOTT D. KUKES

Alternate Advocate for Competition

U.S. Army Mission and Installation Contracting Command, JBSA Fort Sam Houston, TX