

Limited-Sources Justification (LSJ)

For orders or BPAs exceeding the Simplified Acquisition Threshold

This acquisition is conducted under the authority of the Multiple-Award Schedule Program, 41 U.S.C. § 152(3), Competitive Procedures, and 40 U.S.C. § 501, Services for Executive Agencies.

1. Agency and Contracting Activity

The Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), Office of Acquisition Management (OAQ) is the procuring activity for this requirement.

2. Nature and/or Description of the Action Being Approved

DHS ICE Office of the Chief Information Officer (OCIO) Solutions Delivery Division (SDD) is modifying Contract No. HSCECT-14-F-00041 pursuant to FAR part 8.405-6(a) to increase the value and period of performance of the previously awarded task order for the procurement of services to provide support for continued, uninterrupted data warehouse and TECS Modernization Technical Assistance activities in support of the ICE TECS Modernization Program for an additional twelve (12) months [base period of eight (8) months and a four (4) month option], from 1 June 2018 through 31 May 2019. The task order is due to expire on 31 May 2018. All option periods, including the full use of FAR 52.217-8, have been exhausted. The proposed action will provide continued support while the Government finalizes necessary stabilization efforts, competes the follow-on requirement on GSA IT Schedule 70, and transitions the work under the new task order. This extension will ensure there are no unacceptable delays in fulfilling the Government's requirement while a new effort is competed on GSA IT Schedule 70.

ICE has the following needs:

- Continued support for Cross-System Integration
- Stabilization of the Investigative Case Management (ICM) solution with Department of Homeland Security (DHS) Customs and Border Patrol (CBP) Seized Currency and Asset Tracking System (SEACATS)
- Migration of ICE TECS MOD components to Amazon GOV CLOUD on-target for completion by the end of FY2018
- Effective O&M support of ICE's TECS MOD Final Operational Capacity (FOC) functionality

Pending approval of this justification, the Government intends to extend the task order for continuity of support during these final system integration and hosting relocation activities to the current vendor, Booz Allen Hamilton Inc. (BAH), 8283 Greensboro Dr., McLean, Virginia 22102-3830. In addition to insuring continuity of support, the task order will allow time for adequate transition (90 days) from this current vendor to a new Operations and Support (O&S) contract planned for award in early CY 2019.

3. Description of Supplies/Services

The proposed action will provide continued support while the government achieves the integration and stabilization of ICM with SEACATS MOD's initial operating capability (IOC). The extension will ensure there are no unacceptable delays in fulfilling the government's integration requirement during the time SEACATS MOD's IOC is being achieved and while the follow-on O&S effort is competed on GSA IT Schedule 70. The anticipated period of performance is for an eight (8) month base period from 1 June 2018 through 31 January 2019, and a four (4) month option period from 1 February 2019 through 31 May 2019.

The Government determined 12 months of continued performance on the current contract to be in the Government's best interest to ensure continuity through full completion and stabilization of ICM's integration with CBP SEACATS Modernization's IOC, insuring completion of the DHS DC1/DC2 migration of ICE TECS MOD to the Amazon GOV CLOUD, and providing adequate time to compete and transition to a new O&S vendor.

The total estimated value for this requirement, including an option is detailed below:

Period of Performance	Estimated Price
June 1, 2018 through January 31, 2019 (base period)	\$3,019,563
February 1, 2019 through May 31, 2019 (4-month option)	\$1,509,781
Total estimated price for 12 months	\$4,529,344

Services will include the following:

- Continued planning, execution and stabilization of the initiative to migrate all ICE TECS MOD components at DC1 and DC2 to the Amazon GOV CLOUD environment
- Program Management Support System Engineering Support to include:
 - Infrastructure Engineering
 - Security Engineering
 - Business Process Engineering
 - System Integration Infrastructure activities including new SEACATS MOD Production connectivity
 - Requirements Management Support
 - Development, Testing, and Deployment of the Homeland Security Investigation (HSI) Data Warehouse (DW)
 - Disaster Recovery Support
 - Support for the Office of Professional Responsibility (OPR)
 - Analysis of audit data collected by the various TECS Mod components
 - Tailoring the standard Kibana user interface to meet the Government's expectations

- Migration of ICE TECS MOD components from DC1/DC2 to the Amazon Web Services Cloud infrastructure
- Transition-Out support services

4. Authority and Supporting Rationale.

FAR 8.405-6(a)(1)(i)(B) Only one source is capable of providing the supplies or services required at the level of quality required because the supplies or services are unique or highly specialized.

BAH is currently performing the services and is the only responsible source who can continue to provide the necessary labor skill sets and uninterrupted services, cost effectively and in timely manner, until the follow-on O&S task order under GSA is awarded. It is not realistic to expect another contractor to perform the services for a short-term /interim period of performance at the same level of quality and competitive cost, nor is in the best interest of the Government to compete this effort when an existing contractor has experience and existing resources to perform these services for this interim period. Furthermore, it would be inefficient for the Government to transition the current work while simultaneous planning to compete and transition to a new O&S contract.

In early CY 2019 ICE intends to pursue a competitive task order on GSA IT Schedule 70 for the operation and maintenance services required by the ICE TECS MOD Program that includes the scope and services currently being provided in part by BAH. This proposed action will enable the Government to provide the time to re-stabilize the Program due to extenuating circumstances caused by continuing CBP SEACATS Modernization IOC delays, complete a major hosting transition, and allow for the necessary transition in support services to the vendor coming in to operate and maintain the fully operational ICM system.

The ICE TECS Modernization program has aggressively pursued completion of the coding, testing and go-live preparations for its integration with CBP's SEACATS MOD's IOC for well over 3 years. Unfortunately, that IOC delivery of SEACATS MOD has been delayed (by CBP) for over 9 months,. Due to the highly integrated nature of ICE TECS Modernization and the current legacy SEACATS, an extensive development effort was mounted to minimize disruption caused by the pending SEACATS Modernization deployment. From the date of CBP's go-live, whenever that might be, ICE has the potential to experience critical mission disruption for every day that integration activities are not complete or operating as designed. TECS is a system used for immigration enforcement case management and is therefore critical to ICE's law enforcement mission. Any delays after CBP's go-live would negatively impact that mission. Because of this, all ICE TECS MOD contract vendors are presently and will remain fully committed to completing integration activities with SEACATS.

In addition, a significant portion of the ICE TECS MOD Program is currently planning and executing a coordinated hosting Migration from the current DHS Data Centers (DC1 and DC2) to the Amazon Gov. Cloud. This effort is also consuming considerable resource attention from the existing support teams identified herein. As a result of these ongoing efforts and the

continuing O&M responsibilities of all Program resources, there will be no program resources available to support transition activities that would need to occur if the current contract is not extended.

5. Determination by the Contracting Officer that the Anticipated Cost to the Government Will be represents the best value consistent with FAR 8.404(d).

The contracting officer has determined that issuing the proposed Task Order to BAH for maintenance and transition of TECS MOD represents the best value and will result in the lowest overall cost, considering price and administrative costs, to meet the Government's needs. This order will be placed in accordance with FAR 8.404, "Use of Federal Supply Schedules." The General Services Administration (GSA) has already negotiated fair and reasonable pricing rates. Discounts to these GSA schedule rates will be requested. Additionally, prior to issuance of the task order, the ordering activity will consider the level of effort and the mix of labor proposed to perform the specific task being ordered to determine that the total price is reasonable. The contractor's labor mix and level of effort will also be compared to the Independent Government Cost Estimate and vendors GSA published schedule price to determine price fair and reasonable.

6. A description of market research conducted among schedule holders and the results, or a statement of the reason market research was not conducted.

DHS ICE/OCIO and ICE/OAQ conducted market research through a review of multiple websites of GSA Schedule vendors as well as issued an RFI for follow-on O&S contract. The research shows there are at least twelve interested vendors who could compete for the pending O&S task order. Although ICE found multiple vendors on GSA who can provide these types of services, the current vendor is the only one with the inherent knowledge, gained through years of supporting the program, who is positioned to provide the required services in the most efficient and least disruptive manner without critical mission impact. Therefore, based on the rationale stated above, it would be in the best interest of the Government to extend the current task order with Booz Allen Hamilton to allow for the completion of the current efforts and for ICE to award and transition to a new O&S contractor

7. Any other facts supporting limited sources justification. Additional facts may be stated in this section. If there are no additional fact, you must state here.

In early 2019 ICE intends to pursue a competitive task order on GSA IT Schedule 70 for the operation and maintenance services required by the ICE TECS MOD Program that includes the scope and services described herein. This proposed action will provide the time to re-stabilize the Program due to extenuating circumstances caused by continuing CBP SEACATS Modernization IOC delays, facilitate a major hosting transition, and provide the necessary transition in support services to the vendor coming in to operate and maintain the fully operational ICM system.

8. A statement of actions, if any, the agency may take to remove or overcome any barriers that led to restricted consideration (i.e., limited-sources) before any subsequent acquisition for the supplies or services is made.

The continued performance of the current support services for the period of performance previously stated in this document is in the best interest of ICE to maintain services at the required levels of performance through the integration with CBP SEACATS Modernization IOC and hosting transition. Thereafter, it is the intention of ICE to compete operations and maintenance services on GSA IT Schedule 70. GSA IT Schedule 70 provides a versatile pool of contractors with the ability to perform the required services. The follow-on requirement will be competed among GSA IT Schedule 70 small business vendors. The proposed action will provide the specialized services required, and provide the necessary transition of support services to the vendor coming in to operate and maintain the fully operational ICM system.

9. DHS intends to post this requirement on FedBizOpps pursuant to FAR 8.405-6(a)(2)(i).

10. Technical Requirement and Personnel Certification

Pursuant to FAR 8.405-6(c)(2)(x), I certify that this requirement meets the Government's minimum need and that the supporting data, which form a basis for the Limited-Sources Justification, are accurate and complete.

Technical Representative/COR

May 15, 2018
Date

11. Contracting Officer Certification

Pursuant to FAR 8.405-6(c)(2)(ix), I certify that the Limited-Sources Justification is accurate and complete to the best of my knowledge and belief:

Contracting Officer

15 May 2018
Date

APPROVAL:

This justification is hereby approved.

Competition Advocate

15 May 2018
Date