



Enterprise Services Office of Acquisition  
1401 Constitution Avenue NW  
Washington, D.C. 20230

## Limited Source Justification

*“Source Selection Information – see FAR 2.101 and 3.104”*

### 1. Identification of the agency and contracting activity.

#### a. Federal agency and contracting activity.

Department of Commerce  
Enterprise Services Office of Acquisition  
1401 Constitution Avenue  
Washington, D.C. 20230

#### b. Sponsoring organization.

Department of Commerce  
Office of Human Capital Strategy/LEARN  
1401 Constitution Avenue  
Washington, D.C. 20230

#### c. Project Officer information.

Lisa Wade  
1401 Constitution Ave. NW  
Washington, DC 20230

### 2. Nature and/or description of the action being approved.

The goal of the Department of Commerce (DOC), Office of Human Capital Strategy (OHCS)/LEARN is to promote career professional and leadership development opportunities throughout the Department of Commerce. OHCS/LEARN, is charged with supporting the strategic growth of employees across the DOC to foster the next generation of leaders. By providing various development opportunities for leaders at all levels, the DOC can grow and enhance leadership competencies corporately. In accordance with Department Administrative Order 202.410, the DOC is charged with offering professional development programs. The DOC’s policy is to maximize employee competence through training and development programs. 5 U.S. Code § 4103 also allows for the establishment of training programs under the Government Employees Training Act.



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**Project background.**

The DOC is seeking to strategically source to augment the mindsets and competencies of up to 26 participants at the GS-14, GS-15, and Commerce Alternative Pay System (CAPS) pay band equivalent levels through a leadership development training inclusive of: one-on-one coaching, facilitated lectures, course materials (e.g., books, articles), personal assessments, creation and support in completion of individualized development plans, participation in group action-learning projects, access to industry expertise and networking activities. Development topic areas must take a concentrated focus on leading people, building coalitions, and navigating change while also incorporating the remaining Office of Personnel Management (OPM) Executive Core Qualifications. In order to accommodate the varying schedules of the participants, training opportunities should be held over several months, not to exceed one year. In order to develop the next cadre of leaders at the DOC, the leadership development program must enable the DOC's participants to engage in an exclusive cohort. The outcome of this investment will result in participants gaining the requisite knowledge, skills, and abilities in the following areas:

- Defining individual leadership style,
- Developing high performing teams,
- Championing a culture of change,
- Results driven decision-making and,
- Developing a strategic mindset.

**3. Description of the supplies or services required to meet the agency's needs**

**a. Project title**

Department of Commerce Leadership Development Fellowship Program

**b. Project description.**

• **Requirement type.**

- Support services (non-research & development)
- Supplies/equipment
- Information technology (IT)
- X Other (specify): Leadership Development Training



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• **Type of action.**

- X New requirement
- Follow-on
- Other (specify): \_\_\_\_\_

• **Proposed contract/order type.**

- X Firm-fixed-price
- Time- and-materials
- Indefinite delivery (specify whether indefinite quantity, definite quantity, or requirements): \_\_\_\_\_
- Other (specify): \_\_\_\_\_

• **Acquisition identification number:** AA-HRM-WC-O-23-01041

**c. Total estimated dollar value and performance/delivery period.**

Period of Performance:

April 18, 2023, through March 7, 2024

Total Order Value:

\$296,400.00

**4. Identification of the justification rationale [see 8.405-6(a) and (b)] and, if applicable, a demonstration of the proposed contractor's unique qualifications to provide the required supply or service.**

**a. Acquisition authority:**

This acquisition is conducted under the authority of the Multiple Award Schedule Program. Consideration of schedule contractors will be restricted to fewer than the number required by Federal Acquisition Regulation (FAR) 8.405-6(a)(1) (B):

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

**d. Demonstration of the proposed contractor(s) unique qualifications to provide the required supply or service.**



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- **Name and address of the proposed contractor(s).**

Contractor: PARTNERSHIP FOR PUBLIC SERVICE, INC.  
Address: 600 14TH ST NW  
STE 600  
WASHINGTON, DC 20005-2028

- **Nature of the acquisition and proposed contractor(s) unique qualifications**

The Cohort of Partnership for Public Service, Excellence in Government Fellows Program (EIG) provided by:

The Partnership for Public Service (PPS) has highly unique qualifications, including the ability to facilitate this training by the required geographic location within the Washington, D.C. Metropolitan area. Further, DOC employees mention they have benefitted greatly by having access to a highly qualified group of coaches provided by this entity.

The trainers will have the ability to directly interact with these coaches regularly over the training period of 11 months. This will enable DOC Cohort members to vastly improve their leadership skills, identify and better formulate their career goals. Evaluation of similar training received by previous DOC participants showed a nearly 100 percent satisfaction rate and they would highly recommend this training to their colleagues. The format of the training, coaching and group projects provided by this entity fully meet the unique DOC Cohort requirements.

**5. Determination by the ordering activity Contracting Officer that the order represents the best value consistent with FAR 8.404(d).**

Title 5 of the U.S. Code, Chapter 41 of Government Employee Training Act (GETA), allows the Government to utilize of all avenues, even those outside of Government to train its employees. Paragraph 3 of Section 2 of the Act clearly states the intent. It states that it is intended to improve public service, provide a more efficient workforce in the areas of expense and employee turnover, and retain a well-educated workforce that is aware of developments in and out of Government. From an administrative side, the intent is to provide uniform training and to ensure that all federal employees are treated equally regarding job improvement.



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It is in the best interest of DOC to maintain a consistent high-quality learning methodology for its leaders. An award to a vendor other than PPS would negate the benefits derived from the preceding sessions of The Leadership Development Program. Contracting for commercially available learning events such as The Leadership Development Program, provides the Government a cost efficient and timely means of providing DOC specific targeted training. Recreating this training provided by other organizations would entail development of extensive instructional design, confirmation of quality of training, evaluation of the qualifications and capabilities of coaches, planning and execution of group projects, designing evaluation criteria and ensuring high quality training. To recreate a leadership development program like the commercial off-the-shelf training (COTS) provided by PPS EIG would take many months to complete, requiring significant time spent by the government, be very expensive and would not guarantee to match the quality and breadth of the training that is provided by PPS.

Since (a) GSA has already determined the prices of the supplies and services under FSS contracts, including rates for services offered at fixed hourly rates, to be fair and reasonable; and (b) by placing an order against a schedule contract using the procedures in FAR 8.405, the ordering activity CO has concluded that the order represents the best value (see FAR 2.101) and results in the lowest overall cost alternative as follows:

The Contracting Officer has determined that the expected outcome of this acquisition, in the Government's estimation, provides the greatest overall benefit in response to the requirement and therefore the best value to the Government consistent with FAR 8.404(d), based on all factors considered within this justification. The Contracting Officer will also solicit further discounts for placement of this order.

This approach provides the greatest overall benefit in response to the requirement and results in the lowest overall cost alternative, namely in the forms of time, cost, risk and opportunity.

**6. Description of the market research conducted among schedule holders and the results, or a statement of the reasons market research was not conducted.**

Market research was conducted via GSA Advantage, Office of Personnel Management and other Government sources. Factors considered included cost, availability, technical capacity, and geographic areas served. Lastly, based on market research, the Government has concluded that due to the unique curriculum, format and location; this training, which cannot be found elsewhere, the PPS EIG is the only source capable of fulfilling the Government's need. here is no competition anticipated for this acquisition.



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**7. Any other facts supporting the justification.**

PPS is the only recognized not-for-profit organization with the stated mission of striving to revitalize the federal Government by inspiring a new generation to serve and by transforming the way it works. The EIG program perfectly aligns with the Public Service Leadership Model that sets the standard for effective federal leadership and Identifies core values. such as becoming self-aware, engaging others. leading change and achieving results. all unique to Government leaders that they must master to achieve the agency mission and desired impact. The model provides direction for addressing current challenges in the federal environment and serves as a guide for federal employees to reach !their full potential. Leaders can use the model as a guide to steer their growth and make decisions within different stages of their careers. The model is a benchmark for building and measuring overall leadership effectiveness. The model also provides clear direction for addressing challenges in the federal environment. By using the model, leaders can evaluate their performance. assess their leadership progress, and chart a course for rigorous self-improvement.

**8. Statement of the actions, if any, the agency may take to remove or overcome any barriers that led to the restricted consideration before any subsequent acquisition for the supplies or services is made.**

**a. Removal of barriers to competition.**

In accordance with FAR 5.301 and 8.405-6{a}(2), this action will be synopsised at award on the System for Award Management {SAM) and the justification will be made publicly available. PPS provides this as proprietary service/materials; there are no other vendors that can provide this COTS service. Lastly, based on market research, the Government has concluded that due to the unique curriculum, format, location of this training, which cannot be found elsewhere, PPS EIG is the only source capable of fulfilling the Governments need. There is no competition anticipated for this acquisition.

**b. Listing of sources, if any, that expressed an interest, in writing, in the acquisition.**

N/A

**9. Program office certification.**

Official	Name & Title	Signature	Date
Project Officer	Lisa Wade, Deputy Chief Learning Officer		3/24/2023



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**10. Contracting Officer certification.**

**This is to certify that the justification for the proposed acquisition has been reviewed and that to the best of my knowledge and belief the information and/or data provided to support the rationale and recommendation for approval is accurate and complete IAW CAM 1306.70, Section 2.6.h. and FAR 8.405-6.**

Official	Name & Title	Signature	Date
Contracting Officer	Raymond J. Meraz	<i>Raymond J Meraz</i>	3/24/2023