

LIMITED SOURCES JUSTIFICATION
FOR FEDERAL SUPPLY SCHEDULE
ICE OFFICE OF ASSET AND FACILITY MANAGEMENT

In accordance with the requirements of Federal Acquisition Regulation (FAR) Subpart 8.405-6(a), this "Limited Source Justification" supports the exception specified in FAR 8.405-6(a)(1)(i)(C), that the award must be issued on a sole-source basis, the work is a logical follow-on to an originally competed Federal Supply Schedule award.

1. Identification of the agency and the contracting activity, and specific identification of the document as a "Limited Source Justification".

The Department of Homeland Security (DHS), U.S. Immigration and Customs Enforcement (ICE), Office of Acquisition Management (OAM), proposes to issue a GSA Schedule Task Order, single award, under the authority of a logical follow-on award, as the basis for restricting competition.

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

ICE has a requirement on a sole source basis to contract for a 12 month base period with two 12 month option periods for Management and Support services at ICE Headquarters located at 500 12th Street S.W., Washington, DC 20536. The Department of Homeland Security (DHS), U.S. Immigration and Customs Enforcement (ICE) Headquarters, Office of Assets and Facilities Management (OAFM) is required to maintain a financial management and portfolio management structure that ensures continuity of important organizational support services across its Real Property Portfolio. Real Property management includes activities for facilities planning, design, construction, leasing, and operations. To achieve its mission, OAFM requires contractor management and support services that will maintain and improve OAFM's ability to plan, communicate, and measure the performance of real property portfolio management at ICE Headquarters, to program offices, and its customers throughout the agency and DHS Headquarters.

The name of the proposed contractor is:

Deloitte & Touche LLP
1919 N. Lynn Street
Arlington, VA 22209-1742

The ICE OCFO BPA HSCEMS-12-A-00017 was one of five GSA Federal Supply Schedule BPAs awarded. The existing BPA Call HSCEMR-13-F-00045 under Blanket Purchase Agreement (BPA) HSCEMS-12-A-00017 is set to expire 02/26/2017. The current BPA call (HSCEMR-13-F-00045) was competed. A three year BPA Call is being requested in order to fully compete the requirement with the current vendor.

3. A description of the supplies or services required to meet the agency's needs (including the estimated value):

The incumbent Contractor, Deloitte & Touche LLP, will provide services related to support the implementation and maintenance of the Real Property Management System (RPMS) to maintain data integrity of the ICE facility portfolio in accordance with the RPMS Data Management Plan to align OFA's goals and performance targets with those of the Department of Homeland Security (DHS) and the OCFO to achieve its performance objectives with clarity and understanding for its customers. Additionally, the contractor shall perform advanced enterprise

level portfolio analysis and obtain metrics like facility utilization, space allocation, resource deployment, funds allotment and execution, etc. that utilizes data from all modules in TRIRIGA.

The total estimated value of the requirement is \$3,921,182.16. This includes a one-year base period and two (2), twelve (12) month options.

Period		Quantity	Total Price
Base Year	April 27, 2017-April 26, 2018	12 months	\$1,275,287.88
Option Period 1	April 27, 2018-April 26, 2019	12 months	\$1,306,791.24
Option Period 2	April 27, 2019-April 26, 2020	12 months	\$1,339,103.04
		Total	\$3,921,182.16

4. *The authority and supporting rationale and, if applicable, a demonstration of the proposed contractor's unique qualifications to provide the required supply or service.*

This order is being issued under the authority of FAR 8.405-6(a)(1)(i)(C) "In the interest of economy and efficiency"; with the new work issued as a logical follow-on.

The justification of FAR 8.405-6(a)(1)(i)(C) is due to OAFM's business processes maturing and RPMS adoption as the system of record for OAFM. There is a critical and urgent need to implement additional capabilities in the TRIRIGA software for Lease Administration; Owned Portfolio Projects, Operations and Maintenance; Space Management, and Energy and Environmental Sustainability with configurations and customizations as needed. Additionally, due to the RPMS system continuing to evolve, there will continually be a requirement to upgrade and add additional capabilities during the life of the system, which will require continuity of effort.

RPMS is currently in a critical development phase that requires consistency in design, management and knowledge of the project. Any changes at this time would seriously impact both the operational aspect and project schedule. At this point, RPMS will require an estimated 9- 12 months to develop and establish the functionality of the Owned Property Module, which is currently in the middle of design, testing and deployment, followed by an additional 6 months for the Space Management Module, 6 months for the Environmental Module, and an additional 7 months to meet the DHS Reports, Compliance, Customer Review Board items. As the above requirements evolve it may be required to extend the estimated timeline due to disruptions by new business requirements, changes in process due to new directives/policies and audit defensibility measures.

The current contractor plays a critical role in designing control measures, as well as preparing for and responding to DHS OIG, Financial and other audit requests along with other Government stakeholder's data requests and develop near and long term corrective action plans. The knowledge gained through these tasks is used in the development of enhanced performance metrics and measurement. Continuity of Deloitte operations without loss of institutional and program knowledge is crucial to establishing performance standards based on benchmarking and historic performance trends.

The current contractor is uniquely positioned in the market with the complete set of skills required to successfully implement to deployment, including expert Tririga implementation and configuration experience, federal real estate market expertise, business process change

management and audit defensibility development background. This unique mix of skills will continue to allow ICE to successfully implement, configure and integrate Tririga into ICE's current business model. Without this teams continued support, ICE will lose capability to establish the integrated root cause analysis procedures into the performance variances of critical rent and lease data analysis.

New priorities, changes in business processes and mandatory compliance and regulations have made build out and deployment of RPMS functionality critical and deployment of new capabilities is being rolled out on an extremely tight schedule. The modules and the associated reports overlap with many data sets being mapped to various locations. Subsequent enhancements build upon prior work and position developers to make future planned changes to configurations. There is not a 'clean' stop point until all of the basic modules are deployed. Disruption of the current critical path will cost the government significant time and money, will result in compliance failure. The DHS CFO has mandated that certain IT audit mitigation measures and controls be in place on an extremely tight deadline. Halting current work would result in missing these critical due dates and potentially expose ICE to external hacking and security breaches. Historically, the RPMS system has 4-6 IT Management Action Plans (MAP's) for audit remediation a fiscal year.

For FY16, RPMS MAP's were:

ICE-IT-16-03 Audit Logging

ICE-IT-16-06 RPMS Security Management

ICE-IT-16-07 Audit Log Implementation Review

ICE-IT-16-09 RPMS Lack of Controls Changes in

Production ICE-IT-16-10 RPMS Privileged Users

ICE-IT-16-25 Factual Accuracy Review

MAP remediation takes approximately 9 months providing no interruptions or redirection of effort that may delay the resolution. To have another contractor come in mid-cycle would significantly delay completion of the control efforts resulting in potential Notice of Findings from ICE's FY17 Financial Statement Audit currently being conducted. It is critical ICE continue to deploy RPMS functionality on the current schedule with the incumbent contractor team with no disruption.

5. A determination by the Ordering Activity Contracting Officer that the order represents the best value:

As the proposed action is a logical follow-on GSA Schedule BPA Call, the Contractor's prices were determined to be fair and reasonable, based on superior discounts provided through competition, at the time of the initial BPA award via GSA.

The Contracting Officer hereby determines that this action represents the best value to the Government in accordance with FAR 8.404(d) in that the current incumbent, Deloitte & Touche LLP provides three (3) significant cost savings advantages to consider as follows: (1) avoidance of the transition costs or delay in services, (2) a staff with complete knowledge of the system and processes and (3) cleared employees already on site.

The services being acquired are available on GSA Federal Supply Schedule Financial and Business Solutions (FABS) Schedule 520, special item numbers (SIN) 520-7 (Financial & Performance Audits), 520-8 (Complementary Audit Services), 520-11 (Accounting), 520-12 (Budgeting) and 520-13 (Complementary Financial Management Services). In accordance with FAR 8.002, the use of Federal Supply Schedules satisfies the requirements for obtaining supplies

and services at a higher priority than the use of commercial services. In addition to the pre-existing GSA discounting, ICE will negotiate additional cost savings, where applicable.

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

Market research was not conducted.

7. Any other factors supporting the justification:

For this particular procurement, based on the rationale stated above, it is determined to be in the best interest of the Government to utilize Deloitte & Touche LLP. No other contractor has the institutional knowledge of ICE and OFA to meet the requirements as stated in paragraph 4.

8. A 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/or the supplies or services are made:

The Department of Homeland Security plans to award a department wide contract to support this requirement (financial management and portfolio management structure that ensures continuity of important organizational support services across its Facilities).

See Attachment 1. One base year and 2 option years will allow for the completion of the module deployments. The sustainment, modification and enhancements are planned following the competed contract period.

9. The Ordering Activity Contracting Offer's certification that the justification is accurate and complete to the best of the Contracting Officer's knowledge and belief

The Contracting Officer's signature below certified that the justification is accurate and complete to the best of the Contracting Officer's knowledge and belief.

10. Evidence that any supporting data that is the responsibility of technical or requirements personnel (e.g. verifying the Government's minimum needs or requirements or other rationale for limited sources) and which form a basis for the justification have been certified as complete and accurate by the technical or requirements personnel:

The Technical Representative's signature below will serve as justification certification.

11. Certifications

I certify that the facts and representations under my cognizance, which are included in this justification, meet the Government's minimum need and that the supporting data, which forms a basis for this justification, is complete and accurate.

Requirements/Technical Personnel:

**GARRY L
BRANCH**

Digitally signed by GARRY L BRANCH
DN: c=US, o=U.S. Government, ou=Department of
Homeland Security, ou=ICE, ou=People, cn=GARRY
L BRANCH
0.9.2342.19200300.100.1.1=0230606911 ICE
Date: 2017.07.25 15:05:45 -0400

Garry L. Branch
Technical Representative

Contracting Officer:

I certify that the justification is accurate and complete to the best of my knowledge and belief.

ROBERT V ROBERTS

Digitally signed by ROBERT V ROBERTS
DN: c=US, o=U.S. Government, ou=Department of Homeland Security, ou=ICE,
ou=People, cn=ROBERT V ROBERTS
Date: 2017.07.27 09:16:37 -0400

Robert V. Roberts
Contracting Officer

Date

12. Concurrence

It is determined that the basis for the use of other than full and competition procedures is:

One level above approval (DAD)

TONY P ROSS

Digitally signed by TONY P ROSS
DN: c=US, o=U.S. Government, ou=Department of Homeland
Security, ou=ICE, ou=People, cn=TONY P ROSS,
0.9.2342.19200300.100.1.1=0301318171 ICE
Date: 2017.07.27 09:16:37 -0400

Tony Ross
Deputy Assistant Director

Date

APPROVAL:

This justification is hereby approved.



Albert Dainton
Deputy HCA
ICE Competition Advocate


Date

Attachment I

Current FY17 Priorities Status

The current release schedule and status for FY17.

Release	Status	Timing	Benefits	Training Date
2.3 – Capital Project Changes and RWA Enhancements	✓	Complete	<ul style="list-style-type: none"> Updated RWA functionality for multiple fund codes on single RWA and accounting strings Updated RWA term version Inclusion of IAA checklist into form User system enhancements to fix identified user issue for creation of budgets and budget summaries for project records Updated SF-91 cover letter 	11 January
2.4 – RWA Phase B (change orders)	✓	Complete	<ul style="list-style-type: none"> RWA change order capability and updated accounting strings functionality 	14 February 2017
2.6.1 – Oracle 12C and VAS 8.3.3.3	✓	Complete	<ul style="list-style-type: none"> Oracle 12c upgrade Updated VAS to version 8.3.3.3 	N/A
2.6.2 – Move to Additional VMs	●	12 May 2017	<ul style="list-style-type: none"> Additional VM to support expanded system footprint, improve response time 	N/A
2.8 – Single Sign On (SSO) & 3.3.1 Platform upgrade	●	12 May 2017	<ul style="list-style-type: none"> SSO solution TRIRIGA platform upgrade to 3.3.1 	May 2017
2.9 – RWA Routing and Owned Projects Updates	●	11 June 2017	<ul style="list-style-type: none"> Incorporate RWA routing and automation Revise owned projects schedule template Automate owned projects routing Incorporate O-514 form for use in owned projects 	June 2017
2.a – Owned Maintenance and Reporting		May – September 2017	<ul style="list-style-type: none"> Automate maintenance work order tracking Deploy at pilot site, Krome, for maintenance Automate maintenance related reporting 	TBD

Notes:

- Releases attempt to balance OIG mandated updates, current user base enhancements and new expansion items
- These priorities were established based on feedback from leadership to balance current CRB items and expansion priorities
- Schedule assumes a dual-workstream approach for both functional and technical aspects
- These priorities can be adjusted based on leadership direction