

**LIMITED SOURCES JUSTIFICATION and APPROVAL
IN ACCORDANCE WITH FAR PART 8.405-6**

**RFQ M11PS00073
COST AND PERFORMANCE MANAGEMENT TOOL SUPPORT**

In accordance with FAR 8.405-6(a)(1)(D)(C), this new procurement to be conducted under Request for Quotations number M11PS00073 is a logical follow-on to an original Federal Supply Schedule (FSS) task order, which was competitively awarded to Grant Thornton LLP as Task Order number M10PD00520. The original order was placed in accordance with the applicable Federal Supply Schedule ordering procedures. This acquisition is being conducted under the authority of the Multiple-Award Schedule Program.

JUSTIFICATION

1. Identification of the Agency and Contracting Activity

The United States Department of the Interior, Bureau of Ocean Energy Management, Regulation and Enforcement (BOEMRE), Procurement Operations Branch, plans to place an order under the Federal Supply Schedule with restricted competition. This document sets forth the Justification and Approval for award on a limited sources basis in accordance with FAR Part 8.405-6.

2. Nature/Description of Action Being Approved

The action being approved is for a Logical Follow-on task order for continuation of services of the project entitled "Activity Based Cost Management and Performance Support" awarded under a previous Federal Supply Schedule task order to Grant Thornton LLP (Task Order No. M10PD00520).

3. Description of Supplies or Services Required to Meet Agency's Needs (Including the Estimated Value)

The services that are required will support the managerial cost accounting and performance measurement information needs of the two agencies resulting from the reorganization of BOEMRE effective 1 October 2011, the Bureau of Ocean Energy Management (BOEM) and the Bureau of Safety and Environmental Enforcement (BSEE), as well as the Office of Natural Resources Revenue (ONRR), which was created as the result of Order 3299 signed by the Secretary of the Interior on 19 May 2010.

The estimated value of the task order is \$553,417.47 for a one year period of performance. This logical follow-on order shall serve as a "bridge" until the requirements for a new competitive three year (base period plus 2 option periods) procurement can be defined and a task order awarded.

4. Authority and Supporting Rationale [see FAR 8.405-6(a)(1)(i) and (b)(1)]

Per FAR 8.405-6(a)(1)(i)(C), the work is a logical follow-on to an original Federal Supply Schedule (FSS) order (Grant Thornton LLP Task Order M10PD00520), placed in accordance with applicable FSS ordering procedures, and was not issued under sole source or limited source procedures. The services to be provided are not "items peculiar to one manufacturer"; therefore, the circumstances addressed in FAR 8.405-6(b)(1) are not applicable to this procurement.

5. Determination by Contracting Officer that the Order Represents Best Value

The logical follow-on task order will be placed with the current contractor, Grant Thornton LLP, performing the same services at GSA schedule rates already determined to be fair and reasonable. Prior to award of the task order, the Contracting Officer will conduct a price evaluation and make a documented best value determination based upon the technical approach and the pricing offered by Grant Thornton LLP.

6. Description of Market Research Conducted and Results or a Statement of the Reason Market Research was not Conducted

Market research was conducted in the original competitive GSA schedule task order with Grant Thornton LLP (Task Order number M10PD00520). Market research conducted for this procurement revealed that issuing this solicitation as a logical follow-on is the most suitable means of fulfilling the Government's requirement.

7. Any Other Facts Supporting the Justification

This procurement will be issued as a logical follow-on order in the interest of economy and efficiency in accordance with FAR 8.405-6(a)(1)(i)(C). Conducting this procurement as a logical follow-on will allow the Government to avoid the risks and delays that would be associated with transitioning this work to a new Contractor at a crucial time during the reorganization of the agency:

The logical follow-on task order will serve as a "bridge" during a period of time within which the Government can better determine the full impact of the reorganization and managerial decisions can be made regarding the long-term requirements of the new bureaus.

As the current task order ends on 30 September 2011, the use of a logical follow-on order will permit BOEMRE to complete the procurement within a shorter time frame than conducting a competitive procurement, allowing the Government to avoid an extended period during which the services are not available.

These circumstances described above contributed significantly to the decision to issue the logical follow-on to M10PD00520.

8. Actions to Be Taken, if any, to Overcome Barriers to Competition Before any Subsequent Acquisition is made

Extensive market research will be conducted to determine potential vendors (including small businesses) that could provide the required services. Recommendations and technical assistance from the Program office in identifying potential vendors will also be requested.

9. Certification and Approval from the Contracting Officer

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

10. Recommendation from Program Office

Supporting technical data which forms the basis for this justification was provided by the technical and requirements personnel (provided as an attachment) and is complete and accurate.

APPROVAL

Based on the above justification, and in accordance with FAR 8.405-6(a)(1)(i)(C) & FAR 8.405-6(c), approval is granted to award a logical follow-on task order to Grant Thornton LLP for the project entitled "Cost and Performance Management Tool Support".

FOIA Exemption (b) (6)

Francis E. Bennett, Contracting Officer
Procurement Operations Branch

9/16/2011
Date

Concur:

Ce FOIA Exemption (b) (6)

Celeste H. Rueffert, Branch Chief
Procurement Operations Branch
Chief of the Contracting Activity

9/16/11
Date

Approve:

FOIA Exemption (b) (6)

Mark E. Eckl, Division Chief
Procurement Division
Competition Advocate

9/16/11
Date