NATIONAL AERONAUTICS AND SPACE ADMINISTRATION
GLENN RESEARCH CENTER (GRC)
CLEVELAND, OHIO

Limiting Sources Justification; FAR 8.405-6, Limiting Sources

PR4200463953

I. Description of Requirement

This acquisition will be conducted under the authority of the Multiple-Award Schedule (MAS) Program FAR 8.405-6(a)(1)(C) Limiting Sources.

I recommend that GRC negotiate only with Jefferson Solutions to establish a BPA against their existing GSA MOBIS contract, GS-23F-8050H, to conduct specialized training courses, provide quarterly reviews of a previously developed strategic plan, and for possible revisions to said plan and/or training courses.

A previously competed MAS Federal Supply Schedule (FSS) award, NNC11DC82D, to Jefferson Solutions resulted in the development of a Center Strategic Plan for identifying and attracting non-NASA Business. The contract also led to the development of a three day training course for Business Development, External Partnering, and Communication and Engagement Skills for Business Development. At this time, the center desires to provide two additional sessions of the training course and to assess the implementation of the plan on a quarterly basis as well as, if necessary, to revise the plan and/or training based on said assessment. The Government estimates, but does not guarantee, that the volume of purchases through this agreement will be $400,000.

II. Statutory Basis for Other Than Full and Open Competition

This acquisition is conducted under the authority of the Multiple-Award Schedule Program. FAR 8.405-6, Limiting Sources "Orders placed or BPAs established under Federal Supply Schedules are exempt from the requirements in part 6. .

III. Rationale In Support of Statutory Authority

As prescribed by FAR 8.405-6(a)(1)(C), this new work is a logical follow-on to an original FSS order, NNC11DC82D, which was competed. The training course and analysis of the strategic plan developed under the previous order by Jefferson Consulting Group cannot be provided by another contractor without incurring all costs to recreate those items. Training must be provided by the contractor who developed the training. Evaluation of the Strategic Plan must be performed by the contractor who developed the plan. Revisions to the training course and/or strategic plan must be performed by the contractor which developed the course and plan.

IV. Description and Results of Market Research

Market Research was not deemed necessary as the services being acquired are very specific to the training course and strategic plan developed for NASA GRC under the

previous order. A description of this requirement will not be posted to the NASA Acquisition Internet Service/FedBizOpps per FAR 38.101(e) and FAR 8.404(a),

> **8.404 Use of Federal Supply Schedules.**
> (a) *General.* Parts 13 (except 13.303-2(c)(3)), 14, 15, and 19 (except for the requirement at 19.202-1(e)(1)(iii)) do not apply to BPAs or orders placed against Federal Supply Schedules contracts (but see 8.405-5). BPAs and orders placed against a MAS, using the procedures in this subpart, are considered to be issued using full and open competition (see 6.102(d)(3)). Therefore, when establishing a BPA (as authorized by 13.303-2(c)(3)), or placing orders under Federal Supply Schedule contracts using the procedures of 8.405, ordering activities shall not seek competition outside of the Federal Supply Schedules or synopsize the requirement.

V. Determination of Fair and Reasonable Cost

The proposed hours are very much aligned with the Government's estimate; ultimately reducing the number of hours being contracted. The hourly prices for the required services are negotiated contract prices. Notwithstanding, as a result of a reduction in prices on the previous order, resulting from competition, a similar reduction in pricing was negotiated. Therefore, the prices are considered fair and reasonable.

VI. Actions to Remove or Overcome Barriers to Competition

Being that the original action, order NNC11DC82D, resulted in a very specific to GRC unique training course and strategic plan; it is difficult to overcome the limited sourcing of this follow on action. The work being acquired directly relates to work performed under the previous order. All work performed under this BPA will be related to the previous order. All new work requirements not related to the previous order will be subject to competition.

Certification		**Date**
Contract Specialist:		2/13/13
Review		
Branch Chief:		2/13/13
Approval		
Procurement Officer:		2/17/2013