

**National Aeronautics and Space Administration  
Ames Research Center  
Moffett Field, California 94035-0001**

**Justification for Other than Full and Open Competition**  
[FAR 6.303-2(b)(1)]

**Summary Information:**

Initiating Office: NASA Ames Research Center  
Office of the Chief Financial Officer, Code C

Purchase Request: TBD

Procurement File: Financial Support Services

Total Estimated Value: **FOIA Ex 5.**

Period of Performance: 1 NOV 2014 – 31 MAR 2015

Statutory Authority: 10 USC 2304(c)(1), *Only One Responsible Source and No  
[FAR 6.303-2(b)(4)] Supplies or Services Will Satisfy Agency Requirements.*

This Justification for other than full and open competition has been prepared in accordance with the requirements of Federal Acquisition Regulation (FAR) 6.303 and NASA FAR Supplement (NFS) 1806.303.

**Detailed Information:**

**A. Nature and/or description of the action being approved.** [FAR 6.303-2(b)(2)]

NASA Ames Research Center (ARC) proposes to negotiate a sole source contract modification with Al-Razaq Computing Services to extend the period of performance for the current Financial Support Services (FSS) contract (GS-23F-0337P/NNA08BB30T) for up to five (5) additional months, consisting of a one two-month base period (November 1, 2014 through December 31, 2015) and three one-month Options (January 1, 2015 through March 31, 2015, if exercised). The total contract performance period, including this extension, will be six (6) years and six (6) months in the event that all option periods are exercised. The purpose of this extension is to provide on-going critical financial support services to NASA ARC while the Government Accountability Office (GAO) protest of the follow-on FSS contract award is adjudicated. In addition, this extension is intended to coincide with the 45-day phase-in period of the FSS contract award.

**B. Description of the supplies or services required to meet the agency's needs (including estimated value).** [FAR 6.303-2(b)(3)]

NASA ARC requires continued financial support services for critical administrative and programmatic organizations pending adjudication of the GAO protest.

The FSS contract provides a variety of specialized support services to NASA ARC. Specifically, the critical areas supported under the contract include, but are not limited to:

Resources Management: Assistance with the development and submission of ARC's full cost budget requirements, as well as oversight and management of Center funding including Center organization, programs and projects.

Financial Management: Support of the control of appropriations and funds received at the Center, including fiduciary responsibilities over appropriation integrity and compliance with Agency and other federal policies and regulations. Initial overview for accuracy and consistency of financial information reflected in ARC books of account, for adhering to internal controls for financial accounting activities, and for supporting external audits.

Travel Services: Review of travel authorizations, assistance to travelers, submission of travel orders and expense reports subject to review in a timely manner.

Cost Estimating and Earned Value Management (EVM) Services: Review of program cost, schedule and performance, cost estimating services such as developing, testing, maintaining and updating of cost models.

On September 10, 2014, the follow-on FSS contract was awarded. Post-award debriefings were held with each offeror. ARC was notified of a timely protest received by the GAO on September 29, 2014. The contract extension associates with this JOFOC will allow for continued performance of existing critical financial support services (including a 45-day phase-in on the newly awarded contract) while the GAO protest is adjudicated. The continued financial support services for ARC is essential pending resolution of the GAO protest.

If the current NNA08BB30T FSS contract is not extended and support ceases, the Center will be severely impacted. The result of a separate competition and award for this remaining period of time would endanger the continuity of services, which are critical to support ARC and NASA's mission. In addition, there would be a substantial duplication of cost to the Government that could not be recovered. This includes those costs associated directly with a re-procurement and those learning-curve costs associated with the abrupt and unplanned transition to a new contractor. Therefore, this potential five (5) month contract extension is necessary to provide coverage of critical requirements pending adjudication of the GAO protest.

FSS is intended to provide support for mission operations, science, space, and exploration requirements for various ARC supported programs and projects. The contractor support provided is critical to the success of the various mission operations, programs and projects supported at ARC and interruption could adversely impact these schedules. The existing contract will require an increase in scope, i.e., sufficient additional funding to accommodate this extension.

NNA08BB30T is a Firm Fixed Price (FFP hybrid contract consisting of a Core requirement, Indefinite Delivery/Indefinite Quantity (IDIQ) with FFP task order and one Time & Materials (T&M) task. The current maximum value of the Core requirements for the entire contract is **FOIA Ex 5.** The maximum value of the IDIQ is currently **FOIA Ex 5.** The Independent

Government Cost Estimate (IGCE) for the potential five (5) month extension is **FOIA Ex 5**. For Core requirements and **FOIA Ex 5**. for IDIQ requirements, which is based on historical costs from the performance of requirements on the current contract over the last several months. The IGCE for this extension includes consideration for continuing the requirement support of the Core requirements and the remaining amount available in the IDIQ contract value.

**C. An identification of the statutory authority permitting other than full and open competition.** [FAR 6.303-2(b)(4)]

The statutory authority for this procurement is 10 USC 2304(c)(1), *Only One Responsible Source and No Other Supplies or Services Will Satisfy Agency Requirements*.

**D. Demonstration of the proposed contractor's unique qualification or the nature of the acquisition requires use of the authority cited.** [FAR 6.303-2(b)(5)]

In accordance with FAR 6.302-1(a)(2), when the supplies or services required by the agency are available from only one responsible source, or for DoD, NASA, and the Coast Guard, from only one or a limited number of responsible sources and no other type of supplies or services will satisfy agency requirements, full and open competition need not be provided for. For the reasons set forth below, the incumbent contractor is the only responsible source that can reasonably satisfy the requirements pending award of the follow-on contract.

The proposed extension to the current period of performance of the FSS contract is necessary for ARC to obtain services pending phase-in of the follow-on FSS procurement. A separate competition and award to a different contractor for up to a five (5) month period is neither feasible nor reasonable given the ongoing FSS follow-on procurement. A separate competition would result in substantial duplication of costs, disruption of services and unacceptable delays that would adversely impact the seamless continuity of services necessary to support the financial support requirements for ARC. This duplication of costs would include not only those costs associated with the competition of a separate procurement for the extension period, but also the costs associated with phase-in activities for the separate five (5) month contract. A separate phase-in would be necessary for the five (5) month extension to ensure that the new, possibly different, contractor has proper knowledge of work requirements necessary to support the ongoing FSS requirements. Hence a five (5) month extension of the current contract, rather than a new procurement for a five (5) month contract, is the only cost-effective and reasonable approach for NASA to take in the present situation.

The extension of the FSS contract will allow sufficient time for the continuation of specialized financial support services, pending adjudication of the GAO protest. Without the proposed contract extension, ARC would suffer unacceptable delays and a catastrophic gap in support for its financial services currently performed throughout the entire Center. Without extending the current contract, the financial support services used by the Center in support of all of its personnel, programs, and projects would be severely impacted.

**E. Description of efforts made to ensure that offers are solicited from as many potential sources as is practicable, including whether a notice was or will be publicized as required by FAR Subpart 5.2 and, if not, which exception under 5.202 applies.** [FAR 6.303-2(b)(6)]

Pursuant to NASA FAR Supplement 1804.5j70, this proposed action will be published on the NASA Acquisition Internet Services (NAIS) website. Additionally, and pursuant to FAR 5.201, this

proposed contract action will be synopsisized on the Federal Business Opportunities (FBO) website. Any responses received as a result of these publications on NAIS and FBO will be appropriately dispositioned and documented in an addendum to this document. As described herein, the FSS acquisition is in process and a phase-in of the follow-on to the FSS contract is forecasted to occur within the period of time of the extension sought in this justification.

**F. A determination by the Contracting Officer that the anticipated cost to the Government will be fair and reasonable.** [FAR 6.303-2(b)(7)]

The Contracting Officer's signature on this document indicates that the Contracting Officer (CO) has determined that the anticipated cost to the Government will be fair and reasonable. Prior to the award of any Core requirement, task order or task order modification under NNA08BB30T, the CO and Contracting Officers's Representative (COR) will perform an analysis in accordance with FAR 15.404, using price evaluation techniques, to assure that the proposed price is fair and reasonable. Pre-negotiation objectives will be prepared prior to the initiation of negotiations and will be approved in accordance with FAR 15.406 prior to the conduct of negotiations.

**G. Description of the market research conducted and the results or a statement of the reason market research was not conducted.** [FAR 6.303-2(b)(8)]

Limited market research was conducted in support of the decision to award this extension to Al-Razaq Computing Services. Based on the COR's technical knowledge of the current FSS requirements, and for all of the other reasons stated herein, Al-Razaq Computing Services is the sole responsible source able to fulfill the critical FSS requirements pending adjudication of the GAO protest. Based on the knowledge of the market place, formal market survey activities will not be pursued to provide the required support services.

**H. Any other facts supporting the use of other than full and open competition.** [FAR 6.303-2(b)(9)]

The COR has determined that Al-Razaq Computing Services is qualified to perform the proposed contract extension at ARC through March 2015 – and is the only responsible source reasonably capable of continuing to provide the services required to support critical programs and projects while the FSS follow-on procurement is being completed without unacceptable delays or substantial duplication of costs to the Government. It is clear that Al-Razaq Computing Services can continue to provide seamless support services for the current critical mission support, programs and projects conducted at ARC without unacceptable delays or substantial duplication of cost to the Government.

**I. Listing of the sources, if any, that expressed, in writing, an interest in the acquisition.** [FAR 6.303-2(b)(10)]

See response in Section G.

**J. Statement of the actions, if any, the agency may take to remove or overcome any barriers to competition before any subsequent acquisition for the supplies or services required.** [FAR 6.303-2(b)(11)]

Since the number of qualified and interested contractors has always been adequate for the

competition of the FSS requirement, there are no actions that agency needs to take to remove or overcome any barriers to competition before any subsequent acquisition for these services.

ARC has awarded the follow-on competitive procurement for FSS and additional time is needed to adjudicate the GAO protest and complete the procurement process. This sole source award of up to a five (5) month extension to the FSS contract is necessary to provide additional time needed to complete the FSS follow-on procurement, adjudicate the GAO protest, and support critical financial support services requirements throughout the Center. Phase-in of the follow-on contract is expected to occur within the time period of the extension authorized herein.

For the foregoing reasons and to prevent unacceptable delays and substantial duplication of costs in fulfilling the Agency's requirements, Al-Razaq Computing Services is the only responsible source to support the current FSS requirement for the proposed five (5) month contract extension while the GAO protest is adjudicated.

**Signature Page**

**Requirement Initiator:**  
*Diana Chan*

I certify that the facts presented in this justification are accurate and complete.

*Diana Chan*  
Signature

9 Oct 2014  
Date

**Contracting Officer:**  
*Norman P. Julien*

I hereby determine that the anticipated cost to the Government will be fair and reasonable and certify that this justification is accurate and complete to the best of my knowledge and belief. [FAR 6.303-2(b)(12)]

*Norman P. Julien*  
Signature

9 Oct 2014  
Date

**CONCURRENCE:**

**Chief Financial Officer:**  
*Paul Agnew*

*Paul Agnew*  
Signature

10/9/14  
Date

**Procurement Officer:**  
*Kelly G. Kaplan*

*Kelly G. Kaplan*  
Signature

9 Oct 14  
Date

**APPROVAL:**

**Center Competition Advocate:**  
*Lewis S.G. Braxton III*  
ARC Deputy Director

*Lewis S.G. Braxton III*  
Signature

10/10/2014  
Date

cc (after approval):  
JAC Admin Asst: 241-1