

**DEPARTMENT OF THE TREASURY
LIMITED-SOURCES JUSTIFICATION**

This acquisition is conducted under the authority of the Multiple Award Schedule Program (see FAR 8.401)

1. Identification of the agency and the contracting activity:

The requiring activity is the Bureau of the Fiscal Service (Fiscal Service), Office of the Chief Data Officer, and the contracting activity is Fiscal Service, Division of Procurement Services.

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

The Bureau of the Fiscal Service (Fiscal Service), Office of the Chief Data Officer (OCDO), Data Strategy Division requires continued professional support services for data-related modernization efforts, in accordance with mission critical enterprise-wide strategic initiatives. This requirement is entitled "Data Strategy Support." The purpose of this limited-sources justification is to obtain approval to award a Logical Follow-on Blanket Purchase Agreement (BPA) Call under Booz Allen Hamilton's OneARC Strategic Support Services (OSSS) BPA 2033H620A00008 (written against their GSA contracts GS-35F-386DA and GS-00F-008DA) for the purchase of services described in Section 3.a below. The anticipated Period of Performance (POP) is 04/06/2024 - 04/05/2027, inclusive of a 12-month Base Period and two (2) 12-month Option Periods.

2.b Name of the vendor: Booz Allen Hamilton Inc. (BAH)

2.c Requisition No.: FSA-30400200-24-001

2.d Bridge contract: Yes No

2.e Brand name: Yes No

3.a A description of the supplies or services required to meet the agency's needs:

The proposed acquisition is for OCDO to continue to acquire mission critical support services for the modernization of Fiscal Service's enterprise-wide data ecosystem. These support services were originally acquired via 2033H620A00008 / 2033H621F00069 Data Strategy Call, which was awarded to BAH (against their GSA contracts GS-35F-386DA and GS-00F-008DA) following an unrestricted competitive solicitation among the OSSS BPA holders.

The OCDO requires continued support services from BAH for the furtherance of Fiscal Service strategic initiatives in accordance with the Performance Work Statement (PWS), as summarized below:

- **Fiscal Data Hub** – Modernization of Fiscal Service's approach to data management and data analytics. This includes:
 - Expanding the Fiscal Data Hub to include additional use cases.
 - Supporting an expansion of the Fiscal Data Hub's data mesh¹ towards an enterprise solution which can operate within a multi-hybrid virtualized environment.
 - Providing improvements to technical architecture which incorporates data, security, and functional application/user delivery tiers.

- **Data Analytics and Machine Learning** – Establishment of a data analytics program and mentoring framework, while leveraging machine learning within Fiscal Service. This includes (next page):

¹ A data mesh is an architectural framework that solves advanced data security challenges through distributed, decentralized ownership. Organizations have multiple data sources from different lines of business that must be integrated for analytics. A data mesh architecture effectively unites the disparate data sources and links them together through centrally managed data sharing and governance guidelines. Business functions can maintain control over how shared data is accessed, who accesses it, and in what formats it's accessed. A data mesh adds complexities to architecture but also brings efficiency by improving data access, security, and scalability. (Source: <https://aws.amazon.com/what-is/data-mesh/>)

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- Developing and implementing data analytics, strategies, methodologies, and tools to enhance data-driven decision-making processes.
 - Providing mentoring support to employees, enabling them to develop their skills in data analysis, visualization, and interpretation.
 - Designing and deploying scalable infrastructure to handle large-scale data processing and storage, leveraging advanced machine learning algorithms for data analysis.
- **Enterprise-wide Data Management and Communications** – Modernization of data storage, data access, data security, and technical aspects of data management (e.g., metadata management, data asset and exchange inventories, standardization, etc.). This includes:
 - Rationalizing enterprise data storage strategies and devising strategies to harmonize and connect various data stores.
 - Assisting in efforts to align existing and new IT investments to the OCDO’s enterprise-wide conceptual data model as well as internal policies and standards.
 - Supporting development of agency policy to comply with data best practices.
 - Supporting communications and leveraging/researching policies for implementation in Fiscal Data Hub.

Refer to the PWS for more details.

3.b Includes IT: Yes No

4.a Identification of the authority being used (Check the appropriate box that applies).

- FAR 8.405-6(a)(1)(i)(A) – An urgent and compelling need exists, and following the procedures would result in unacceptable delays.
- FAR 8.405-6(a)(1)(i)(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.
- FAR 8.405-6(a)(1)(i)(C) – In the interest of economy and efficiency, the new work is a logical follow-on to an original Federal Supply Schedule order or BPA provided that the original order or BPA was placed in accordance with FSS procedures in accordance with the applicable Federal Supply Schedule ordering procedures. The original order or BPA must not have been previously issued under sole-source or limited-sources procedures.
- FAR 8.405-6(b) – Items peculiar to one manufacturer. (i.e., Brand Name specifications)

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4.b Supporting Rationale:

The proposed contractor's unique qualifications and the nature of the acquisition requires the use of the authority cited as follows:

- I. BAH is uniquely qualified to provide the support services necessary to support OCDO's ongoing enterprise-wide data-related strategic initiatives. Utilization of BAH's support services presents the most efficient use of the Government's resources based on established key relationships, experience, ongoing development work, efficiency, and cost effectiveness.
- II. It is essential to the Government that BAH continue to provide support services for this requirement. Over the past three (3) years, BAH has developed key relationships between the OCDO, Treasury Departmental Offices, and the Federal Reserve Bank, in support of Fiscal Service's enterprise data strategic initiatives. BAH has in-depth knowledge of all aspects, components, and stakeholders related to the ongoing modernization of Fiscal Service's enterprise-wide data ecosystem which a new contractor would not be able to sufficiently replicate in a timely manner. Such a transition would decrease the velocity of team output and potentially disrupt OCDO initiatives while relationships are built with the new contractor. Onboarding another contractor would not represent an efficient use of Government resources.
- III. BAH has elevated and irreplaceable experience and knowledge regarding the core elements of the OCDO's ongoing data modernization efforts. Continuing to utilize BAH services presents the most cost-effective solution, as the required services must continue without interruption. If a new vendor were selected as result of a competitive solicitation, BAH would require additional funding for expedited vendor training in hybrid platform design/development, multiple cloud platform and multi-customer data ecosystems, metadata management and policy/governance, and in-depth cloud design and architecture for data management. Due to the time required to develop the skills necessary to function in the capacities currently assigned to BAH resources, it would be impractical (from a schedule and cost perspective) to onboard a new contractor to provide these services.
- IV. Continuing to utilize BAH support services will achieve significant efficiencies and cost savings for the Government, when compared to onboarding a new contractor:
 - This project would require immediate course corrections if the project team does not perform at the highest levels possible, or if project priorities shift (which happens often in the agile environment). Fiscal Service must minimize the risk of overall project failure in terms of cost, schedule, quality, and value.
 - Development and/or revision of Fiscal Service agency-wide policy to comply with data best practices in the areas of data quality, data management, data storage, access, movement, and security (among other areas) typically takes a year if the resource has previous experience. It would be prohibitively impractical to onboard inexperienced new

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contractor resources to take on these ongoing Fiscal Service policy development efforts.

- BAH has made three (3) years' progress on the expansion of the Fiscal Data Hub's mesh towards an enterprise solution which can operate within a multi-hybrid virtualized environment. Competing to a different contractor's enterprise solution is out of scope and would cost substantially more for planning, development, functional training, licensing, and consulting services, in addition to the vendor training requirements mentioned above. Considering the need-by date, such an endeavor would require a bridge-contract and is not recommended by OCDO or Fiscal Service at this time.
- Transition to a new contractor would include extra cost for Full-Time Equivalent (FTE) supplementary internal oversight on all development, ongoing maintenance, and support services provided by the new contractor.
- OCDO does not have the resources to provide the BAH training which would be necessary to facilitate adequate transition to a new contractor. In addition, internal resources do not maintain the knowledge that BAH has related to hybrid platform, multiple cloud platform and multi-customer data ecosystems.
- Increased costs would have a negative impact on OCDO's customers where budgetary constraints are already being realized.

5. A determination by the ordering activity Contracting Officer that the order or BPA represents the best value consistent with FAR 8.404(d):

The Contracting Officer has determined that the BPA Call represents the best value consistent with FAR 8.404(d) and lowest overall cost alternative (considering price, special features, administrative costs) to meet the Government's needs based on obtaining pricing information from the proposed contractor for the purposes of conducting a price analysis.

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

Due to the nature of the acquisition and the unique qualifications of the proposed contractor as described in section 4 above, Government market research was based on historical data. However, the Government will seek competition for these services if needed in the future.

7.a Any other facts supporting this justification:

Contract History: 2033H620A00008 / 2033H621F00069. The previous award was a T&M BPA Call to BAH under their OSSS BPA to provide data strategy support services for the Office of Fiscal Accounting². This was competed on an unrestricted basis among the twelve (12) OSSS BPA holders. Four (4) quotes were received. TCV: \$12,275,478.66. POP: 01/06/2021 – 01/05/2024. On 12/13/2021, 2033H621F00069 Modification P00001 extended the POP end-date to 04/05/2024.

The requirements in the PWS cannot be modified to enhance competition because the OCDO's requirement can only be fulfilled by a contractor which has demonstrated knowledge and experience providing the ongoing specific services described in section 3.a. and can continue the Fiscal Data Hub enterprise solution currently under development.

² This requirement shifted from the Office of Fiscal Accounting to the newly created Office of the Chief Data Officer during the Fiscal Service Future Readiness reorganization of 2022.