

**THE BUREAU OF INDIAN AFFAIRS
DETERMINATIONS AND FINDINGS**



**JUSTIFICATION OF OTHER THAN FULL AND OPEN COMPETITION
TRUST ASSET ACCOUNTING MANAGEMENT SYSTEM (TAAMS)**

I. FINDINGS

1. Organization:

The United States Department of the Interior, Bureau of Indian Affairs, Division of Acquisition and Property Management, proposes to enter into a contract on a basis of other than full and open competition for the United States Department of the Interior, Bureau of Indian Affairs, Office of Trust Services.

2. Nature/Description of Action:

The Bureau of Indian Affairs intends to award an Indefinite Quantity Indefinite Demand (IDIQ) contract not to exceed November 30, 2018. The contract is estimated at 35 million. The contract shall be awarded to:

CGI
14800 Landmark Blvd, Suite 300
Dallas, TX 75254
Deborah McLeod, Vice President
(972) 383-6072

The contract shall be awarded for the continuance of support services, software updates, and enhancements to the Trust Asset and Accounting Management System (TAAMS), which is

the Bureau of Indian Affairs' (BIA) official system of record used to manage the Indian trust corpus. The BIA has managed the trust corpus using TAAMS for the past 15 years.

3. Description of Services:

The existing contract with CGI ends on November 30, 2013. The follow-on contract provides continuity in support services, software updates, and the following critical and time sensitive enhancements to TAAMS:

- a. Land Buy Back for Tribal Nations Module
- b. TAAMS Mapping Functionality in support of the Fee to Trust Module
- c. Osage Mineral Estates Module
- d. Contract Management Module

4. Statutory Authority:

41 U.S.C. 253(c)(1) as implemented by FAR 6-302-1 only one responsible source and no other supplies or services will satisfy agency requirements.

5. Applicability of Authority:

In FYs 2012/2013, a Sources Sought solicitation was released by the Department in order to conduct market research for capabilities required by the BIA to operate the TAAMS system. The goal of the Sources Sought solicitation action was to determine if there might be a Commercial Off-the-Shelf (COTS) product that could meet the BIA's needs with little or no modification. The BIA has a core requirement to account for fractionalization of Native American lands which often consist of miniscule ownership interests for which the government must distribute income derived to these individual interests. To do this, algorithm capability must divide ownership to "10 places" to the right of the decimal and "43 places" for numerator and denominator. There were five submissions. All submissions, except for that submitted by the incumbent contractor, were unable to meet the BIA's core fractionation requirement. All but the incumbent proposed to sub-contract and utilize various systems that would require major customization and interfaces. It was determined that this course of action would result in the government paying twice for functionality already present in the current system and result in significant cost to the government in dollars, manpower, and down time. After reviewing the Sources Sought submissions it was determined that there was no other system available that could meet the core fractionation requirement and needs of the BIA without significant time, modification and cost to the government. Time is a significant factor due to actions required as part of the Cobell Settlement, the Osage Settlement, the Fee-to-Trust initiatives, and the contract management and regulatory reporting requirement. These initiatives rely on TAAMS in its current and proposed future state. The incumbent is the only demonstrated contractor capable of delivering the functionality required to manage the Indian trust corpus.

6. **Efforts to Obtain Competition:**

Based on information in Section 5, above, competition for this action was not feasible.

7. **Fair and Reasonable Price:**

The new effort will be negotiated and we have several years of data to utilize for evaluating fair and reasonable pricing. Total estimated contract capacity: \$32,500,000.00.

8. **Market Research:**

See Section 5.

9. **Interested Sources:**

Under the Sources Sought the following companies responded: Deloitte Consulting LLP, ESRI, Hitachi Consulting, CGI, and SEI Investments.

10. **Action to Increase Competition:**

The requiring activity is currently undertaking system planning that will support full and open competition anticipated by the end of FY 2018.

TECHNICAL REQUIREMENTS PERSONNEL CERTIFICATION

The technical and requirements personnel certify that any supporting data contained herein, which is their responsibility, is both complete and accurate.

CONTRACTING OFFICER'S CERTIFICATION

The Contracting Officer's signature on this justification Review Document evidences that he/she has determined this document to be both accurate and complete to the best of his/her knowledge and belief.

RECOMMEND:
APPROVAL



Tammy Harris
Trust Reform Liaison Officer
Contracting Officer's Representative


Date

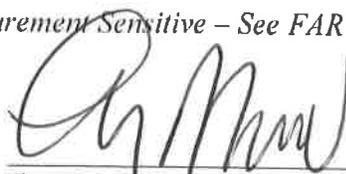
CONCUR:



Bryan Rice
Deputy BIA Director, Trust Services
TAAMS Business Owner

September 19, 2013
Date

APPROVE:

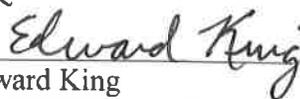


Tom Moomaw
Contracting Officer

9/19/13
Date

Pursuant to 41 U.S.C. 253 (f) (1) (ii), I have reviewed the above Justification of Other Than Full and Open Competition and have approved or disapproved as indicated below:

Approved { } Disapproved



Edward King
Chief Financial Officer (Acting)
Head of Contract Activity

9-19-13
Date