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Washington, DC 20548**

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Decision

Matter of: ManTech International Corporation

File: B-311074

Date: April 15, 2008

Paul F. Khoury, Esq., William J. Grimaldi, Esq., John R. Prairie, Esq., and Brian G. Walsh, Esq., Wiley Rein, for the protester.

Anne Perry, Esq., Jonathan Aronie, Esq., and Daniel Marcinak, Esq., Sheppard Mullin, for Analex Corporation, the intervenor.

Vincent A. Salgado, Esq., Daniel Hymer, Esq., and Laura M. Giza, Esq., National Aeronautics & Space Administration, for the agency.

David A. Ashen, Esq., and John M. Melody, Esq., Office of the General Counsel, GAO, participated in the preparation of the decision.

DIGEST

Protest by incumbent contractor that evaluation of offerors' proposed approaches to phase-in at start of contract failed to account for incumbency advantage is denied where agency recognized that incumbent protester's policies and incentives, reflected in 95 percent employee retention rate, had a high probability of maintaining incumbent workforce, thereby significantly reducing transition risk and warranting a significant strength, and also reasonably determined that awardee offered an exceptional strategy, with many incentives for incumbent employee retention, in support of plan to recruit [REDACTED] percent of incumbent workforce, thereby also warranting a significant strength.

DECISION

ManTech International Corporation protests the National Aeronautics and Space Administration's (NASA) award of a contract to Analex Corporation, under request for proposals (RFP) No. NNG06160944R, for Environmental Test and Integration Services (ETIS) at Goddard Space Flight Center (GSFC) in Greenbelt, Maryland. ManTech challenges the evaluation of proposals.

We deny the protest.

BACKGROUND

GSFC functions as an end-to-end research and development laboratory for the development and operation of scientific instruments, spacecraft, space shuttle payloads, sounding rockets, balloons, satellite servicing, and supporting ground systems. RFP Statement of Work (SOW) § I. The solicitation contemplated award of a cost-plus-award-fee indefinite-delivery/indefinite-quantity contract, with a 5-year ordering period, to furnish environmental test and integration services, including structural dynamics testing; electromagnetic testing; space simulation testing; optical fabrication, assembly and testing; mechanical integration of space flight components into spacecraft; thermal blankets; and facility maintenance.

Award was to be made to the offeror whose proposal represented the “best value” to the government, RFP § M.2; Federal Acquisition Regulation § 15.303(b)(6), based on three evaluation factors: (1) a numerically-scored mission suitability factor, which included subfactors for response to a representative task order (RTO)/understanding the requirements of the SOW (500 of 1,000 available points), management plan (300 points), safety and health plan (150 points), and small disadvantaged business participation (50 points); (2) cost; and (3) past performance. Overall, mission suitability was more important than cost, which was more important than past performance; cost was significantly less important than mission suitability and past performance combined. RFP § M.2.

The solicitation RTO response requirement was of particular importance in the evaluation. In this regard, the solicitation as amended required offerors to furnish a written task plan responding to generic sample problems organized into 14 subtasks to be performed over a 6-month period; the response to the RTO was to “serve as a basis for the evaluation of how the offeror will carry out the tasks associated with the SOW,” with the offeror being evaluated on “how it will implement and staff the RTO.” RFP, Amend. 005, § M.3. The 14 subtasks were organized as follows: (1) environmental test of a spacecraft bus; (2) mechanical integration operations; (3) certification of an overhead crane; (4) optical integration support; (5) procurement of a thermal vacuum chamber; (6) advanced manufacturing tasks; (7) electrical cable harness fabrication; (8) design, fabrication and installation of thermal blankets; (9) ensuring safety requirements are satisfied for the subtasks; (10) facility maintenance; (11) contamination control and cleanroom operations; (12) information systems support for the test of a spacecraft; (13) integration and test engineering support; and (14) quality assurance and management support required for the other subtasks. The solicitation further provided that offerors’ responses to subtasks (1) environmental test, (2) mechanical integration, (10) facility maintenance, (11) contamination control, (13) integration and test engineering support, and (14) quality assurance and management support, should include a “narrative response demonstrating the offeror’s understanding of all referenced SOW [Work Breakdown Structure] content.” RFP, Amend. 005, § L.12. In addition, a cost realism analysis was to be performed with respect to the overall proposed cost for

the RTO; in the event that the proposed cost was adjusted upward or downward for cost realism by at least 10 percent, the solicitation provided for a downward point adjustment to be made to the offeror’s mission suitability score. RFP §§ M.3, M.4.

Analex, Mantech (the incumbent contractor), and Jacobs Technology, Inc. submitted proposals in response to the RFP. NASA included all three proposals in the competitive range; after discussions with offerors, the agency requested final proposal revisions (FPR). FPRs were evaluated as follows:

	Analex	ManTech	Jacobs
Mission Suitability	Very Good (894.5 points)	Very Good (845.5)	Very Good (900)
RTO/SOW Understanding	Excellent (485)	Very Good (430)	Excellent (455)
Management Plan	Excellent (279)	Excellent (276)	Excellent (297)
Safety and Health	Good (97.5)	Very Good (109.5)	Good (105)
Small Disadvantaged Business	Good (33)	Good (30)	Very Good (43)
Past Performance	Excellent	Excellent	Excellent
Evaluated Contract Cost	\$151,193,104	\$152,763,941	[\$REDACTED]

Integrated Evaluation Panel Revised Final report at 10, 23, 55.

Although each proposal received the same overall mission suitability rating of very good, NASA evaluated Analex’s (as well as Jacobs’) mission suitability proposal as superior to ManTech’s. In this regard, Analex’s mission suitability proposal received an overall excellent rating for RTO response/SOW understanding, the most important subfactor, on the basis of seven significant strengths, four strengths, and only one weakness. The significant strengths received by Analex’s proposal in this area included: (1) an exceptionally thorough response to the thermal blankets subtask; (2) an exemplary and thorough response to the optical integration support subtask, with a thorough discussion of such considerations as gravity effects, structural deformation, cleanliness and contamination, and temperature and pressure effects; (3) an exceptionally thorough response to the certification of the crane subtask which demonstrated a superior technical approach; (4) a highly comprehensive technical approach to advanced manufacturing planning and fabrication; (5) demonstrating a superior understanding of the electrical cable harness fabrication subtask; (6) an extremely thorough and accurate response to the mechanical integration subtask which demonstrated an excellent understanding of the various tasks encompassed by the subtask and identified relevant technical

challenges and associated resolutions; and (7) an exemplary, very thorough response to the integration and test engineering support subtask. Source Selection Decision (SSD) at 3-4; Integrated Evaluation Panel Revised Final Report at 23-41.

In contrast, ManTech's mission suitability proposal received an overall very good rating for RTO response/SOW understanding on the basis of four significant strengths, three strengths, three weaknesses and one significant weakness. The significant strengths received by ManTech's proposal in this area included: (1) a superior response to the thermal blanket fabrication subtask, which demonstrated an innovative and detailed approach; (2) an exceptionally thorough response to the certification of the crane subtask which demonstrated a superior technical approach; (3) demonstrating an excellent understanding of the mechanical integration subtask; and (4) an excellent approach to the test and engineering support subtask. The three weaknesses included: (1) failing to provide adequate staffing for custodial property management of optical equipment; (2) an inadequate staffing skill mix for management of the crane certification and advanced manufacturing tasks; and (3) of particular significance here, inadequate staffing of many key positions (including finance manager, configuration management and cost control) required to manage the RTO. In addition, ManTech's mission suitability proposal also received a significant weakness in this area for failing to provide staffing for management of safety operations for the RTO, contract management and administrative support to management. SSD at 6-7; Integrated Evaluation Panel Revised Final Report at 80-104.

All three proposals were rated excellent for past performance based on "excellent and highly relevant past performance." SSD at 9. As for the cost evaluation, the cost realism analysis of the proposed RTO costs did not result in an adjustment to the mission suitability score for any of the proposals. Regarding the separate calculation of overall contract cost, which was based on each offeror's total composite contract loaded rate for each government-designated direct labor category as applied to the government direct labor hour pricing model (which assumed a total of 2,248,610 contract hours), Analex's evaluated cost (\$151,193,104) was slightly lower than ManTech's (\$152,763,941).

The source selection authority (SSA) determined that Analex's and Jacobs' proposals were competitive, while ManTech's proposal overall was less competitive given its less competitive mission suitability proposal and slightly less competitive cost. As between Analex's and Jacobs' proposals, notwithstanding both having received an excellent rating under the RTO/SOW understanding subfactor, the SSA found a "compelling discriminator" in favor of Analex's proposal due to a "far superior understanding of the requirements in the [SOW]," as reflected in its technical response to the RTO, which "excelled in multiple areas critical to the contract." SSD at 9. Having determined that the cost difference between Analex's and Jacobs' proposals did not represent a meaningful discriminator, and noting that the firms'

past performance ratings were both excellent, the SSA concluded that Analex's proposal represented the best value to the government.

After learning of the resulting award to Analex and being debriefed, ManTech filed this protest. ManTech generally asserts that NASA did not reasonably evaluate its approach to the RTO, and otherwise failed to account for ManTech's relative advantages as the incumbent contractor with respect to contract phase-in and past performance.

In reviewing protests against allegedly improper evaluations, it is not our role to reevaluate proposals. Rather, we will examine the record to determine whether the agency's judgment was reasonable and in accord with the evaluation factors set forth in the RFP and applicable procurement statutes and regulations. The protester's mere disagreement with the agency's judgment does not establish that an evaluation was unreasonable. Hanford Env'tl. Health Found., B-292858.2; B-292858.5, Apr. 7, 2004, 2004 CPD ¶ 164 at 4. Here, we have reviewed all of ManTech's arguments and find no basis for questioning the award decision. We discuss ManTech's primary arguments below.

RTO

ManTech challenges the agency's assessment of a weakness and a significant weakness with respect to its response to subtask 14, for quality assurance and management support required to perform the RTO. In this regard, offerors were required to respond to subtask 14 by describing "their approach to providing Quality Assurance support for Subtasks 1 to 13, excluding Subtask 9, to ensure that the GSFC Quality Management System . . . is followed," and "their approach to the management support necessary for Subtasks 1 through 13." RFP, Amend. 005, RTO. Generally, offerors were required to identify in their RTO response the "technical approach, labor categories, projected hours, Government interface, the flow of activities . . . and any other information required to determine the adequacy and reasonableness of the offeror's plan"; the plan was to be "specific, detailed, and complete to demonstrate a clear and full understanding of the objectives," and should "demonstrate the techniques and procedures necessary to satisfy the requirements in a timely and cost effective manner." RFP, Amend. 5, § L.12. In addition, offerors were required to furnish as part of their cost proposals the basis for estimates for the RTO, giving the government "insight at the Subtask Level . . . into the cost estimating thought processes and methodologies used by the offeror in estimating the quantities of labor hours/costs, other direct costs, etc. required for successful performance of the RTO." RFP, Amend. 009, § L.13(i). As part of this requirement, offerors were specifically required to "[e]xplain in detail how Program Management and Administrative Support (purchasing, property, human relations, secretarial, etc.) are costed," including an explanation of the estimating assumptions used for direct costs and the cost pool for indirect costs. Id.

As noted above, ManTech's mission suitability proposal was assessed a significant weakness under the RTO/SOW understanding subfactor with respect to its response to subtask 14 on the basis that it failed to provide any staffing for management of safety operations for the RTO, contract management, and administrative support to management. In this regard, ManTech proposed no hours under the RTO for a safety operations manager, which the agency evaluated as "greatly increas[ing] the risk of harm to both personnel and critical equipment and infrastructure." Integrated Evaluation Panel Revised Final Report at 99-100. Further, although ManTech's proposed contract effort relied on subcontractors, its RTO proposal also did not include any hours for its contracts manager position, whose responsibilities under ManTech's overall proposal extended to both contract and subcontract management, as follows:

[REDACTED].

ManTech FPR Cost Proposal at 34. The agency determined that the absence of contracts manager hours "significantly increases the risk to schedule performance and constitutes a proposed flaw that appreciably increases the risk of unsuccessful contract performance." Integrated Evaluation Panel Revised Final Report at 99. Nor did ManTech propose any hours for administrative support to management in the performance of the RTO. While ManTech has not rebutted the agency's determination that ManTech's RTO proposal should have included hours for a safety operations manager, as discussed below, it has challenged the agency's determination that 166 contracts manager hours were necessary for performance of the RTO.

In addition, ManTech's mission suitability proposal was assessed a weakness under the RTO/SOW understanding subfactor for failing to include any configuration manager hours for several subtasks and for underestimating hours for other subtasks, thereby "significantly increas[ing] technical risk"; failing to provide staffing to perform cost control for four of the subtasks, thereby resulting in a "significant increase in cost and schedule risk"; and providing only [REDACTED] of the 441 finance manager hours considered necessary by the agency for ManTech's RTO performance. Integrated Evaluation Panel Revised Final Report at 92-98. Regarding the inadequacy of the finance manager hours, the only part of the evaluation in this area that ManTech has rebutted, ManTech's proposal described the responsibilities of the position as follows:

[REDACTED]

ManTech FPR Cost Proposal at 34. The agency determined that ManTech's inadequate finance manager RTO hours resulted in "high cost and schedule risk." Integrated Evaluation Panel Revised Final Report at 95.

ManTech challenges the agency's determination regarding the contracts manager and finance manager on several grounds. First, ManTech asserts that the

downgrading of its proposal for inadequate or no staffing in these areas unreasonably failed to take into account ManTech's specific approach to performing the RTO. In this regard, ManTech points to the explanation in its cost proposal that costs for "contract administration and financial support . . . are not included in the RTO price based on the low scope of work being priced." ManTech FPR Cost Proposal at 8.¹

ManTech's position is unpersuasive. The RTO comprised 13 subtasks in addition to the quality assurance/management support subtask 14, to be performed over a period of approximately 6 months commencing on or about the expected date of award. See, RFP, Amend. 006, RTO (RTO of 6 months commencing October 2007); RFP, Amend. 009, § L.13(1) (contract commencing October 2007); cf. NASA Requests for FPRs, Sept. 5, 2007 (expected date of award December 2007). ManTech estimated the total direct labor staffing of its RTO effort as [REDACTED] direct prime and subcontractor labor hours ([REDACTED] of which were subcontractor hours), at a total cost (without fee, but including overhead, other direct costs, materials, and general and administrative costs) of \$[REDACTED]. ManTech FPR Cost Proposal at 121-22. NASA determined that, given the effort required to perform the RTO, successful performance would require some effort by ManTech's proposed contracts manager, who, again, was described in ManTech's proposal as responsible for contract and subcontract management, supporting the program manager in contract administration (including interfacing with the contracting officer and tracking contract deliverables), and monitoring company performance for conformance to the original proposal. ManTech FPR Cost Proposal at 34; ManTech FPR Mission Suitability Proposal at 99. ManTech has not shown that the agency's conclusion was unreasonable; that is, it has not shown that there would be no need for contract administration and monitoring of contract performance, the described responsibility of ManTech's proposed contracts manager. It follows that it was reasonable for the agency to downgrade ManTech's proposal for failing to include any hours for this position.

¹ ManTech asserts that since both offerors treated certain managerial and administrative positions in whole or in part as indirect costs, with ManTech proposing [REDACTED] percent of its contract and finance managers and [REDACTED] percent of its administrative assistant positions as indirect costs, and Analex proposing its financial analyst and administrative assistant positions as [REDACTED], the offerors proposed similar staffing approaches. As discussed below, however, ManTech proposed [REDACTED] contract manager and administrative assistant hours and inadequate finance manager hours as part of its RTO effort, while Analex proposed adequate staffing for comparable positions in those areas as part of its RTO effort. ManTech FPR Total Compensation Plan at 3; ManTech FPR Cost Plan at 6, 8, 188; ManTech FPR Mission Suitability Proposal at 74; Analex FPR Cost Proposal at 46, 48; Analex Basis of Estimate at 45-48.

NASA further determined that successful performance of the RTO would require more than the proposed [REDACTED] hours of effort by ManTech's proposed finance manager. Again, the finance manger was described in ManTech's proposal as having extensive responsibilities, including being responsible for [REDACTED]. ManTech has not shown that, given the very extensive responsibilities assigned its proposed finance manager, the agency unreasonably determined that more than [REDACTED] hours of effort would be required.²

Second, ManTech asserts that there was "simply no meaningful methodology for estimating the precise benefit certain overhead or contract-level positions would provide for these thirteen sample tasks." ManTech Comments, Mar. 20, 2008, at 8. However, NASA estimated the time required to perform each of the functions that ManTech's proposed contracts manager, finance manager, and administrative assistant would be required to perform with respect to the RTO, and ManTech has not shown this approach to be unreasonable. While ManTech has specifically challenged several of the calculations, the material issue here is whether significant required effort was not proposed.³ In this regard, given the extensive responsibilities for contract performance assigned to ManTech's proposed contracts manager and finance manger, we find no basis to question the agency's determination that the deficits in proposed staffing for these positions were sufficiently significant to pose a risk to successful RTO performance. Given the above significant deficits in its proposed RTO staffing, as well as the fact that ManTech has not rebutted the agency's determination that it also failed to propose the requisite configuration manager, cost control and safety operations manager effort, we conclude that NASA reasonably downgraded ManTech's proposal for failing to propose adequate RTO effort in key areas.

Third, ManTech asserts that NASA failed to subject Analex's RTO proposal to a similarly rigorous review. This argument is without merit. NASA states that it reviewed each offeror's proposal to determine whether the proposed RTO hours were within a reasonable range; according to the agency, where the proposed hours for a subtask or a particular position under a subtask were outside the reasonable

² ManTech, which proposed [REDACTED] administrative assistant hours, also challenges the agency determination that 70 administrative assistant hours were necessary for performance of the RTO. ManTech, however, has not shown that the agency was unreasonable in determining that, given the magnitude of the proposed RTO effort, successful contract performance would require [REDACTED] support from an administrative assistant.

³ The precise level of the missing RTO effort was not material to the cost evaluation because the calculated probable cost of the RTO was not included in the overall evaluated contract cost, and the variance of the probable cost from the proposed RTO cost was insufficient to require an adjustment to the mission suitability score.

range, the evaluators then conducted an in-depth analysis to determine what cost realism adjustment should be made. Agency Supplemental Report, Mar. 17, 2008, at 20; Contracting Officer's Supplemental Statement of Facts, Mar. 17, 2008, at 4. The contemporaneous documentation of the evaluation furnished by the agency confirms that the evaluators in fact reviewed the labor hours proposed by Analex for the various subtasks and adjusted them where they were deemed unreasonable for the required work. Integrated Evaluation Panel Revised Final Report at 31-40, 132; Agency Supplemental Report, Mar. 17, 2008, Attach. 1.

The record also supports NASA's position that Analex included hours for performance of the contract management function and financial management function (as well as administrative support) in its RTO effort. In this regard, the agency cites to language in Analex's proposal indicating that the responsibilities of Analex's program manager include such tasks as [REDACTED], while Analex's business manager is generally responsible for [REDACTED]. Analex included hours for both positions in its RTO effort. Analex FPR Mission Suitability Proposal at B-80 to B-83, C-8 to C-13; Analex FPR Cost Proposal, Basis of Estimate, at 45-47. In addition, NASA cites to language in Analex's proposal indicating that both Analex's business manager and its financial analyst (also included in the RTO effort) are responsible for [REDACTED]. Id.⁴

We recognize that not all of the specific activities considered in NASA's calculation of required staff hours during its in-depth reviews of ManTech's proposal (resulting from ManTech's failure to include any hours, or its apparent inclusion of very few hours, for a required function) can be discerned from Analex's proposal. The record, however, indicates that neither offeror described the expected activities of its proposed management and support positions in the exacting detail that NASA used in calculating the probable hours required for a particular required function when an offeror failed to propose hours for, or proposed a clearly inadequate number of hours, for the function. Analex FPR Mission Suitability Proposal at B-74 to B-89; ManTech Mission Suitability Proposal at 67-74.

We further recognize that Analex proposed fewer RTO hours for its business manager ([REDACTED] hours) and its financial analyst ([REDACTED] indirect hours) than were calculated by the agency for ManTech's contracts manager

⁴ Although ManTech has suggested that the portion of Analex's business manager's RTO effort allotted to [REDACTED] is irrelevant to contract management, we agree with the agency that the [REDACTED] reference appears to be a reference to Analex's proposed [REDACTED], for which its business manager is responsible and for which Analex's proposal received an evaluation strength, and thus in fact is relevant to performance of the contract management function. Analex FPR Mission Suitability Proposal at C-14 to C-15; Analex Phase-In Plan at C-6; Analex FPR Cost Proposal, Basis of Estimate, at 47.

(166 hours) and finance manager (441 hours). However, as noted by the agency, the offerors' approaches to performing the RTO were different, with the responsibilities of the offerors' management positions not necessarily corresponding. Thus, for example, a number of other Analex positions (including its program manager) were described in Analex's proposal as contributing to contract management, while the responsibilities assigned by ManTech to its finance manager were very extensive and would appear to encompass work performed by other Analex positions, including its program manager and section managers. ManTech FPR Cost Proposal at 34; Analex FPR Mission Suitability Proposal at B-80 to B-83, C-8 to C-12; Analex FPR Cost Proposal, Basis of Estimate, at 45-48. Furthermore, Analex's proposed overall RTO quality assurance/management support staffing ([REDACTED] hours under subtask 14) substantially exceeded ManTech's staffing in this area ([REDACTED] hours), including, for example, more than [REDACTED] times as many proposed hours for Analex's program manager as proposed for ManTech's ([REDACTED] hours versus [REDACTED] hours). Analex FPR Cost Proposal, Basis of Estimate, at 45-47; ManTech FPR Cost Proposal at 182. NASA concluded that Analex, unlike ManTech, had proposed sufficient overall staffing to perform the management functions necessary for successful RTO performance. ManTech has not shown NASA's conclusion to be unreasonable.

Neither has ManTech furnished any basis to question NASA's assessment of weaknesses on account of ManTech's failure to staff or sufficiently staff some overall management responsibilities required for successful RTO performance, as well as its failure to staff or sufficiently staff management support required for several subtasks. In these circumstances, given Analex's evaluated seven significant strengths, four strengths, and only one weakness under the RTO response/SOW understanding subfactor, versus ManTech's evaluated four significant strengths, three strengths, three weaknesses and one significant weakness, we conclude that NASA reasonably found Analex's proposal to be more advantageous (with an excellent rating) than ManTech's (with a very good rating) under this subfactor.

PHASE-IN

ManTech challenges NASA's evaluation of offerors' approaches to phase-in at the start of the contract. In this regard, the RFP, which included a 30-day phase-in period, provided that the government would evaluate under the management plan subfactor (under the mission suitability factor) each offeror's phase-in approach

for continuity and a smooth transition with the incumbent Contractor during the 30-day phase-in period. The Government will evaluate how clearly the phase-in plan demonstrates an ability to assume full contract responsibility on the effective date of the contract. The Government will evaluate how the phase-in plan specifically address[es] . . . the proposed . . . staffing plan. . . .

RFP § M.3. ManTech asserts that the agency failed to recognize its advantage as the incumbent contractor.

Analex's proposal was rated overall excellent under the management plan subfactor. This rating was based in part on two evaluated significant strengths, one for proposing (1) an "extremely well-planned, comprehensive and detailed phase-in plan that provides for a smooth transition and demonstrates a superb ability to assume full contract responsibility," and the other one for a superior approach to using bonuses tied to the award fees earned by Analex and other bonuses as an incentive to maximize overall employee morale and performance. SSD at 4; Integrated Evaluation Panel Revised Final Report at 41-53. In addition, Analex's proposal received four strengths under the management plan subfactor, for (1) proposing a good system (its online task order management system discussed above) to process task orders and manage multiple ongoing tasks, (2) a good approach for mitigating performance risks and for interfacing with government personnel, (3) a robust fringe benefits package, which would aid in recruiting and retaining employees, and (4) a thorough, comprehensive Mission Assurance Plan which demonstrated Analex's knowledge of and compliance with GSFC's Mission Assurance Guidelines. Analex's only evaluated weakness under this subfactor was an inadequate location allowance and severance pay policy. Integrated Evaluation Panel Revised Final Report at 41-53.

ManTech's proposal likewise was rated overall excellent under the management plan subfactor. ManTech's rating was based in part on a single evaluated significant strength for a superior approach to phase-in, involving no major changeover of personnel, processes or procedures, which would significantly reduce the risk of phase-in. In addition, ManTech's proposal received six strengths under the management plan subfactor, for proposing (1) policies and incentives that have a high probability of retaining employees, maintaining high morale and increasing productivity in a union environment, (2) a good task order and property management system, (3) a good approach to managing workload variability, (4) desirable benefits for part-time workers, (5) an Integrated Knowledge Environment portal that demonstrated a good approach to managing contract work, and (6) a robust total compensation plan. In addition, ManTech's proposal received a weakness on the basis that, in contrast to Analex's thorough, comprehensive mission assurance plan, ManTech's significantly less detailed mission assurance plan was inadequate, failing to demonstrate compliance with GSFC's Mission Assurance Guidelines. SSD at 7; Integrated Evaluation Panel Revised Final Report at 104-18.

Thus, the record indicates that NASA in fact recognized, and assigned ManTech's proposal a significant strength under the management plan subfactor on account of its superior approach to phase-in. NASA specifically recognized that, given ManTech's policies and incentives, reflected in a 95 percent employee retention rate over the past 5 years, ManTech had a high probability of maintaining its incumbent workforce, thereby significantly reducing transition risk. Integrated Evaluation Panel Revised Final Report at 104-06.

However, NASA also recognized that Analex had proposed an “exceptional strategy,” warranting a significant strength, in support of its proposal to hire [REDACTED] percent of the incumbent employees. In this regard, the agency noted that Analex had proposed a very attractive package for recruiting incumbent employees, including: [REDACTED]. In addition, NASA concluded that Analex’s proposed superior approach to bonuses (for which it earned a second significant strength) would likewise increase the likelihood of recruiting incumbent employees. In this regard, the agency noted that Analex had proposed bonuses [REDACTED], in a total amount of up to approximately [REDACTED] percent of salaries, with the bonuses commencing when Analex earned an award fee of at least [REDACTED] percent. (In contrast, in ManTech’s proposed approach of offering bonuses tied to the earned award fee, Mantech commenced the bonuses only when ManTech earned an award fee above [REDACTED] percent, and it only encouraged, but did not require, participation by its subcontractors.) NASA also determined that Analex’s robust fringe benefits package would aid in recruiting employees. Finally, the agency determined that Analex’s plan for [REDACTED], would greatly improve the likelihood of a successful transition. Integrated Evaluation Panel Revised Final Report at 41-45; Agency Supplemental Report, Mar. 17, 2008, at 4-11; ManTech FPR Mission Suitability Proposal at 113, 118; Analex FPR Mission Suitability Proposal at C-26.⁵

We conclude that NASA reasonably determined that Analex offered an exceptional transition approach, with many incentives for incumbent employee retention, which warranted a significant strength under the management plan subfactor. Furthermore, ManTech has not shown that, given Analex’s overall two significant strengths and four strengths under the management plan subfactor, it was unreasonable for the agency to rate Analex’s proposal as excellent in this area. Certainly the fact that ManTech was the incumbent contractor here did not automatically entitle it to a higher rating under the management plan subfactor. See Karrar Sys. Corp., B-310661, B-310661.2, Mar. 3, 2008, 2008 CPD ¶ 51 at 4-5.

PAST PERFORMANCE

ManTech challenges the evaluation of Analex’s past performance. In this regard, the RFP provided for evaluation of each offeror’s record (as well as the record of any significant subcontractor and/or teaming partner) “performing services or delivering

⁵ Analex also proposed that in the event that the level-of-effort required for performance exceeded the available incumbent workforce, the Analex team could call upon [REDACTED] pre-cleared engineers and technicians in the Washington metropolitan area (where GSFC is located), as well as over [REDACTED] ETIS-qualified engineers and technicians at other Department of Defense and NASA locations. Analex FPR Management Plan at C-27 to C-28.

products that are similar in size, content, and complexity to the requirements of this solicitation,” and indicated that “[i]n assessing relevance, the Government will consider the degree of similarity in size, content, and complexity to the requirements in this solicitation.” RFP § M.5. The solicitation provided for six possible past performance ratings (excellent, very good, good, fair, poor, and neutral), each (other than the neutral rating) having both a performance and relevance aspect. Offerors were required to furnish information regarding their (or their significant subcontractors’ and/or teaming partners) completed and ongoing contracts for similar efforts over \$5 million within the last 3 years. In addition, the solicitation included a past performance questionnaire to be completed by the references for each of the listed prior contracts.

As discussed above, both ManTech’s and Analex’s proposals were rated excellent for past performance based on “excellent and highly relevant past performance.” SSD at 9. ManTech essentially asserts that Analex’s experience with spaceflight hardware and support (as included in ManTech’s incumbent contract) was of a sufficiently lesser magnitude than ManTech’s as to preclude Analex and ManTech receiving the same past performance rating.

The evaluation of an offeror’s past performance, including the agency’s determination of the relevance and scope of an offeror’s performance history, is a matter of agency discretion that we will not find improper unless unreasonable, inconsistent with the solicitation criteria, undocumented, or inconsistent with applicable statutes or regulations. Family Entm’t Servs., Inc., d/b/a/ IMC, B-291997.4, June 10, 2004, 2004 CPD ¶ 128 at 5.

Here, NASA’s past performance evaluation was consistent with the solicitation and otherwise reasonable. In this regard, the past performance questionnaire included in the RFP described in some detail the broad range of the work to be performed at GSFC under the SOW. Among other information, the questionnaire requested the reference to complete an SOW Survey, that is, a chart organized by SOW element, including specific SOW services elements (structural test, electromagnetic test, space simulation test, mechanical integration, recertification, optical integration, and facility acquisition or modification), goods elements (electrical cable harness and thermal blankets), functional support elements (safety, facility maintenance, engineering, cleanroom operations and contamination control, logistics, quality assurance, and computer systems management), and management elements (senior management, project management, line management, and configuration management). For each SOW element, the reference was to rate the relevance of the contractor’s performance (either “significant experience,” “moderate experience” or “minimal/did not perform”) and assign a performance rating (excellent, very good, good, fair, poor, and neutral). RFP Past Performance Questionnaire.

Analex cited eight contracts in its past performance proposal, including three of its own and five performed by its teaming partners. NASA considered Analex’s

performance on the Glenn Engineering and Scientific Support (GESS) contract at NASA's Glenn Research Center to have "highly significant relevance" to the work under the SOW here. Presentation to SSA, Dec. 20, 2007, at 101. In this regard, the record indicates that the GESS contract included such work as engineering and conducting low-noise design and acoustic emissions verification for an International Space Station-based microgravity space experiment facility; operation of a structural dynamics laboratory, including design, set-up and performance of structural dynamics testing for space flight program hardware; electromagnetic testing of space experiment packages; space simulation testing, including developing thermal vacuum testing programs for advanced solar concentrators and dynamic power conversion systems; engineering services to integrate space-qualified experiment components in connection with Spacelab, SPACEHAB and the International Space Station's Fluids and Combustion facility; development of optical and electro-optical systems for use in microgravity space experiments; conducting safety reviews for flight hardware development and operation; and assembling and testing flight hardware in NASA cleanrooms. Analex Past Performance Proposal at 9-24. The completed past performance questionnaire returned for the GESS contract, which was signed by the GESS program manager, indicated that Analex had significant experience with six of the above seven specific SOW services elements (including structural test, electromagnetic test, space simulation test, mechanical integration, optical integration, and facility acquisition or modification); moderate experience with one of the two SOW goods elements (electrical cable harness); significant experience with four and moderate experience with another of the seven SOW functional support elements; and significant experience with three and moderate experience with another of the four SOW management elements. The GESS program manager rated Analex's performance excellent overall and excellent in each of the above areas in which it had experience. According to the program manager, "Analex was a key contributor to the success of the GESS Contract. Their technical, cost and schedule performance on a variety of engineering tasks was outstanding." GESS Past Performance Questionnaire.

Analex also listed its performance of the Microgravity Research, Development and Operations Contract (MRDOC) at NASA's Glenn Research Center. In this regard, the past performance questionnaire from the deputy chief for development (who served as the contracting officer's technical representative) generally described Analex's role as developing the Fluids and Combustion Facility, a space station microgravity experiment facility, and designing, developing, testing and integrating spaceflight hardware and software. In its proposal, Analex offered more specific examples of its work under the contract, noting such tasks as operating and conducting tests at the electromagnetic compatibility laboratory; designing and fabricating cables and test fixtures, and supporting vibration testing of flight hardware; designing, fabricating and integrating complex mechanical assemblies of flight hardware and ground support equipment; designing, fabricating and assembling imaging systems to observe combustion events inside the Combustion Integrated Rack combustion chamber for the International Space Station; coordinating efforts with the

International Space Station authorities to ensure that hardware would work seamlessly with mechanical interfaces on the station; and designing, fabricating and testing power and data bus cables for flight hardware and ground support equipment. Analex Past Performance Proposal at 9-24. The completed past performance questionnaire for the MRDOC contract indicated that Analex had significant experience with four of the above seven specific SOW services elements (including structural test, electromagnetic test, mechanical integration, and optical integration), with two excellent and two very good ratings; significant experience with one of the two SOW goods elements (electrical cable harness), with an excellent rating; significant experience with one and moderate experience with two of the functional support service elements, with excellent ratings for two and a very good rating for the third element; and moderate experience with one of the management elements, with an excellent rating. The deputy chief for development at Glenn Research Center rated Analex's contract performance excellent overall.

In addition to these two contracts, Analex listed its performance of the Expendable Launch Vehicle Integrated Service Contract at NASA's Kennedy Space Center, under which it furnished integrated safety, mission assurance, communications and telemetry, engineering services, and facility operations services in support of Expendable Launch Vehicle planning, processing and launch. Past Performance Database, Contract NAS1002026. The contracting officer's entry in the interim, June 2003 Past Performance Database listing for this contract described Analex's performance as "[o]verall very effective performance," with the contractor having "[m]et or exceeded all deliverable requirements"; Analex's performance received very good quality and timeliness ratings, and an excellent rating for cost control, in this interim evaluation. *Id.* In the subsequent (December 2006) past performance questionnaire for the procurement here, Analex's performance under this contract received excellent ratings for each applicable SOW element, including one of the SOW services elements (in which there was significant experience), six of the functional support elements (in which there was significant experience), and four of the management elements (in which there was significant experience). Overall, the questionnaire rated Analex's performance excellent, and described Analex as an "outstanding contractor" that was "extremely strong technically, & cost controls." Expendable Launch Vehicle Integrated Service Contract Past Performance Questionnaire.

In addition to its own three contracts, Analex also listed five contracts performed by its team members. This included three contracts performed by its team member Jackson and Tull (J&T): a contract in which J&T designed, built and tested flight and non-flight hardware and ground support equipment for spacecraft subsystems and instruments, for which an overall excellent performance rating was received; another contract for design, building and testing of flight and non-flight hardware and ground support equipment, in which J&T had difficulty in recruiting personnel for performance in New Mexico and received an overall very good/good rating; and an overall, very much larger contract with one effort for flight servicing and support

and another for mission operations, engineering and software, for which an overall, combined excellent performance rating was received. Past Performance Questionnaires, J&T Contracts NAS5-01090, F29601-01-D-0078/F29601-01-D-0077, HB80E4480N/HB80E4960N. Analex also listed team member Wyle Laboratories' performance on two contracts, including one in which the reference rated its performance as good, but indicated that there could have been better definition of requirements by the customer, and another much larger contract involving significant experience in the SOW areas of functional support and management, for which Wyle's overall performance received an excellent rating. Past Performance Questionnaires, Wyle Contracts 4400119123/4400110481, FA8601-04-D-0005.

In summary, the record available to the agency indicated overall excellent performance by Analex itself on three contracts, and favorable performance by its team members, with excellent overall performance ratings for three of the five listed contracts. In addition, the record indicated that the Analex team had significant relevant experience for every SOW element other than the thermal blankets element, for which the team had moderate relevant experience.

ManTech essentially asserts that only the SOW elements and work most directly tied to space flight hardware are fully relevant. However, its position is inconsistent with the scope of the past performance evaluation provided for under the solicitation. In this regard, as indicated by the past performance questionnaire specified in the RFP, which requested ratings of the relevance and quality of performance under a total of 20 SOW elements, the past performance evaluation was not intended to be limited to only a few of the SOW elements or a particular type of work; rather, the past performance questionnaire evidenced the agency's determination that prior performance of a number of functions and types of work were relevant to the likelihood of successful performance of the contemplated contract here.

In these circumstances, given the overall excellent past performance of Analex and the predominantly excellent past performance of its team members, and the fact that the Analex team had significant relevant experience in all but 1 of the 20 specified SOW elements (as well as moderate relevant experience in the 20th element), we find that NASA reasonably rated Analex's past performance excellent.

In summary, we conclude that NASA reasonably determined that Analex's proposal represented the best value to the government.

The protest is denied.

Gary L. Kepplinger
General Counsel