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Decision

Matter of: Arcticom LLC

File: B-421639.4

Date: March 13, 2024

Kenneth A. Martin, Esq., The Martin Law Firm, PLLC, for the protester.
Robert K. Palmer, Esq., Defense Logistics Agency, for the agency.
Uri R. Yoo, Esq., and Alexander O. Levine, Esq., Office of the General Counsel, GAO, participated in the preparation of the decision.

DIGEST

1. Protest challenging evaluation of the relevancy of awardee's past performance is denied where the evaluation was reasonable and conducted in accordance with the terms of the solicitation.
 2. Protest challenging best-value tradeoff determination is denied where the record reflects that the agency reasonably found that protester's slightly superior technical proposal was not worth its higher price.
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DECISION

Arcticom, LLC, a small disadvantaged business of Anchorage, Alaska, protests the award of a contract to Lakota Solutions, LLC, a small disadvantaged business of Sitka, Alaska, under request for proposals (RFP) No. SP3300-22-R-5006, issued by the Defense Logistics Agency (DLA) for labor and logistics support services. Arcticom challenges both the evaluation of the awardee's past performance and the agency's best-value tradeoff.

We deny the protest.

BACKGROUND

The agency issued the RFP on August 16, 2022, seeking labor and logistics support services at DLA Distribution Norfolk and DLA Land & Maritime at Norfolk Naval Shipyard, both located in Portsmouth, Virginia. Contracting Officer's Statement and Memorandum of Law (COS/MOL) at 3; Agency Report (AR), Exh. 1, RFP at 7. The solicitation, issued as a set-aside under the Small Business Administration's (SBA)

8(a) program, contemplated the award of a hybrid fixed-price and cost-reimbursement indefinite-delivery, indefinite-quantity contract with a 5-year ordering period.¹ RFP at 7, 14. The solicitation required the contractor to provide warehousing and distribution operations and supply management services, including all necessary management, personnel, supervision, materials, tools, and equipment. AR, Supp. Exh. 5, RFP attach. J.1, Performance Work Statement at 2.

The RFP established that award would be made using a best-value tradeoff assessment, considering the following five factors, listed in descending order of importance: (1) management approach; (2) staffing approach; (3) performance confidence assessment; (4) transition and sustainment of operations approach; and (5) cost/price. RFP at 75-76. The non-price factors, when combined, were significantly more important than cost/price. *Id.* at 76. The RFP advised that the “degree of importance of cost/price [would] increase with the degree of equality of the proposals in relation to other factors on which selection is based.” *Id.*

The management approach factor was comprised of three equally important subfactors: (a) operations approach; (b) quality control; and (c) equipment efficiency. *Id.* The staffing approach factor was also comprised of three equally important subfactors: (a) key personnel; (b) staffing and organizational approach; and (c) risk management and employee retention. *Id.* Last, the transition and sustainment factor comprised two equally important subfactors: (a) transition approach; and (b) continuation of essential contractor services. *Id.* at 77

Although the solicitation did not identify subfactors for the performance confidence assessment factor, it provided that the agency would consider the recency, relevancy, and quality of offerors’ past performance references to assess each offeror’s ability to perform the required effort. *Id.* To determine relevancy, the agency would consider the “similarity of scope, magnitude of effort, and the complexities this solicitation requires.” *Id.* The agency would then assign an overall performance confidence assessment rating based on the recent and relevant past performance record, considering available performance quality information.² *Id.*

¹ Section 8(a) of the Small Business Act, 15 U.S.C. § 637(a), authorizes the SBA to enter into contracts with government agencies and to arrange for performance through subcontracts with socially and economically disadvantaged small businesses. Federal Acquisition Regulation subpart 19.8. This program is commonly referred to as the “8(a) program.”

² The agency used the following ratings for the performance confidence assessment factor: substantial confidence, satisfactory confidence, limited confidence, no confidence, and unknown confidence. AR, Exh. 15, Past Performance Evaluation Board (PPEB) Report Addendum at 5. As relevant here, the rating of substantial confidence was described as, “[b]ased on the offeror’s recent/relevant performance record, the Government has a high expectation that the offeror will successfully perform the required effort.” *Id.*

The agency received seven proposals in response to the solicitation and established a competitive range of three offerors, including Arcticom and Lakota. COS/MOL at 8. Following the evaluation of final proposal revisions, the agency awarded the contract to Lakota. *Id.* at 10.

On April 26, 2023, Arcticom filed a protest of the award with our Office, alleging that the agency unreasonably evaluated Lakota’s cost/price proposal, disparately evaluated proposals, and made an unreasonable best-value tradeoff decision. *Arcticom, LLC*, B-421639; B-421639.3, June 13, 2023 (unpublished decision) at 1. In a supplemental protest, Arcticom also challenged the agency’s evaluation of Lakota’s past performance. *Id.* In response to Arcticom’s supplemental protest, the agency submitted a notice of corrective action, and we dismissed the protest as academic. *Id.*

Subsequent to our dismissal of Arcticom’s first protest, the agency reevaluated proposals, conducted a new best-value tradeoff analysis, and made a new source selection decision. COS/MOL at 11-13. The agency assigned the following final evaluation ratings to the proposals of Arcticom and Lakota:

	ARCTICOM	LAKOTA
Management Approach	Acceptable	Acceptable
Operations Approach	Acceptable	Acceptable
Quality Control	Acceptable	Acceptable
Equipment Efficiency	Acceptable	Acceptable
Staffing Approach	Acceptable	Acceptable
Key Personnel	Acceptable	Acceptable
Staffing and Organizational Approach	Acceptable	Acceptable
Risk Management and Employee Retention	Good	Acceptable
Performance Confidence Assessment	Substantial Confidence	Substantial Confidence
Transition and Sustainment of Operations Approach	Good	Acceptable
Transition Approach	Acceptable	Acceptable
Continuation of Essential Contractor Services	Good	Acceptable
Cost/Price	\$31,331,256	\$27,000,781

AR, Exh. 18, Source Selection Decision (SSD) at 5.

After considering the results of the reevaluation, the source selection authority (SSA) again selected Lakota’s proposal as offering the best overall value to the agency. AR, Exh. 18, SSD at 1. Noting that Arcticom and Lakota were “technically equivalent” under the first three factors, the SSA concluded that Arcticom’s strength in the fourth and the least important factor (transition and sustainment of operations approach) did not warrant the payment of the \$4,330,475--approximately 16 percent--price premium over Lakota’s lower-priced proposal. *Id.* at 18.

The agency notified Arcticom of the award on October 31, 2023. Protest at 2. After receiving a debriefing, Arcticom filed this protest with our Office.

DISCUSSION

The protester challenges the agency's evaluation of the awardee's proposal under the performance confidence assessment factor. In particular, the protester argues that the awardee's past performance references did not demonstrate scope, magnitude, and complexity similar to the current requirements, and therefore the agency erred in finding the references to be relevant and in assigning the awardee a "substantial confidence" rating. Arcticom also contends that the agency's best-value tradeoff was improper. For the reasons discussed below, we find that none of the protester's arguments provide a basis to sustain the protest.³

The evaluation of an offeror's proposal is a matter within the agency's discretion. *National Gov't Servs., Inc.*, B-401063.2 *et al.*, Jan. 30, 2012, 2012 CPD ¶ 59 at 5. In reviewing protests challenging an agency's evaluation of proposals, our Office does not reevaluate proposals or substitute our judgment for that of the agency, but rather examines the record to determine whether the agency's judgment was reasonable and in accord with the stated evaluation criteria and applicable procurement laws and regulations. *MicroTechnologies, LLC*, B-413091, B-413091.2, Aug. 11, 2016, 2016 CPD ¶ 219 at 4-5. A protester's disagreement with the agency's judgment in evaluating proposals or in its determination of the relative merit of competing proposals, without more, does not establish that the evaluation was unreasonable. *Veterans Evaluation Servs., Inc. et al.*, B-412940 *et al.*, July 13, 2016, 2016 CPD ¶ 185 at 8-9.

Performance Confidence Assessment

The protester challenges the agency's evaluation of every past performance reference submitted by the awardee. In this regard, Arcticom contends that the agency unreasonably evaluated the similarity in scope, magnitude, and complexity of the

³ While we do not address every argument raised by the protester, we have considered each one and find that none of the arguments present a basis to sustain the protest. For example, in its initial protest, Arcticom asserted that the agency's price evaluation was flawed because the awardee failed to propose wage rates consistent with the collective bargaining agreement as required by the solicitation. Protest at 3-14, 18-19. The agency substantively addressed this allegation in its report. See COS/MOL at 15-17. Rather than rebutting the agency's response in its comments, Arcticom raised new challenges to the agency's price evaluation. Comments at 1-9. The protester's failure to comment on the agency's response to the protest argument renders that argument abandoned, and we will not consider it further. *Booz Allen Hamilton, Inc.*, B-414283, B-414283.2, Apr. 27, 2017, 2017 CPD ¶ 159 at 5 n.9. Arcticom subsequently withdrew its new challenges to the agency's price evaluation. Supp. Comments at 2.

awardee’s references to the current requirement. Comments at 9-15. Arcticom also asserts that the agency failed to properly weigh the past performance references submitted for work performed by Lakota’s major subcontractor. Protest at 14-16; Comments at 16.

As noted, the solicitation provided that the agency’s relevancy assessment will consider the similarity of scope, magnitude of effort, and the complexities this solicitation requires. RFP at 77. Based on demonstrated similarity in these three aspects, the agency assessed each past performance reference as very relevant, relevant, somewhat relevant, or not relevant. See AR, Exh. 15, PPEB Report Addendum at 17, 40-41. The solicitation also informed offerors that, “[w]ith respect to relevancy, more relevant past performance will typically be a stronger predictor of future success and have more influence on the performance confidence assessment than past performance of lesser relevance.” RFP at 77.

The record shows that Lakota’s proposal included five past performance references, three for work performed by Lakota and two for work performed by its major subcontractor. AR, Supp. Exh. 3, Lakota Performance Confidence Assessment Proposal at 5-14. The evaluators found two of Lakota’s references to be very relevant, two to be relevant, and one to be somewhat relevant, as follows:

Ref. #	Contractor	Recency	Scope	Magnitude	Complexity	Overall Relevancy
1	Lakota	Recent	Similar	Not Similar	Similar	Relevant
2	Lakota	Recent	Similar	Very Similar	Similar	Very Relevant
3	Lakota	Recent	Similar	Not Similar	Similar	Relevant
4	Subcontractor	Recent	Very Similar	Very Similar	Very Similar	Very Relevant
5	Subcontractor	Recent	Somewhat Similar	Somewhat Similar	Similar	Somewhat Relevant

AR, Exh. 15, PPEB Report Addendum at 40-41. Overall, the evaluators found that all five of Lakota’s past performance references “demonstrated . . . specific knowledge and experience in the performance of receipt, storage, physical inventory, issue, local delivery, and packaging of a wide variety of commodities using [Department of Safety and Security] or a different [warehouse management system] to accomplish the mission.” *Id.* at 41. The evaluators also noted that the references “demonstrated knowledge and experience in the performance of distribution services as required by this solicitation.” *Id.*

The evaluation of the relative merit or relevance of past performance references is generally a matter within the agency’s discretion, which our Office will not disturb unless

it is shown to be unreasonable or inconsistent with the solicitation's evaluation criteria. *Sayres & Assocs. Corp.*, B-418382, Mar. 31, 2020, 2020 CPD ¶ 134 at 5. The evaluation of past performance, by its very nature, is subjective; an offeror's disagreement with the agency's evaluation judgments, without more, does not demonstrate that those judgments are unreasonable. *Noble Supply & Logistics, Inc.*, B-417494.3, Aug. 7, 2020, 2020 CPD ¶ 267 at 4-5. Minor differences in offerors' past performance are insufficient to call into question the reasonableness of the source selection authority's conclusion that two offerors were "essentially equal" with regard to past performance. *Information International Associates, Inc.*, B-416826.2, *et al.*, May 28, 2019, 2019 CPD ¶ 200 at 7.

Based on our review of the record, we conclude that the agency's evaluation of the awardee's past performance references was unobjectionable. While we do not discuss every argument the protester raises, we discuss a few representative examples below.

The protester contends, for example, that the agency erroneously found Lakota's first past performance reference (for the supply support activity for the 543rd quartermaster company's 10th mountain division's unit maintained equipment (UME) program) to be relevant because the magnitude and complexity of the work performed under the reference was not similar to the current requirement.⁴ Comments at 11-13. In this regard, the protester argues that this reference did not include enough of the specific tasks enumerated in the solicitation to be considered similar in complexity to the solicited effort. *Id.*; Supp. Comments at 3-8. The protester also argues that this reference could not be considered relevant because it was not similar in magnitude to the current effort.⁵ *Id.*

⁴ The RFP described the scope of the current requirement as "manag[ing] and execut[ing] warehousing and distribution operations and supply management requirements in support of shipyard customers," with functions to include "material issue, stow of material, inventory, [c]are of [s]upplies in [s]torage (COSIS), requisition processing and technical support of shipyard customers." RFP at 63. The magnitude of the solicited effort was described as "services for a total period [of] performance of five years" and an "anticipated full performance level of approximately 78 [c]ontractor [f]ull [t]ime equivalents [(FTEs)]." *Id.* For complexity, the solicitation stated that similar work would "include[] but [] not [be] limited to demonstrating performance history" of seven specific task areas: (1) successful outcomes in participating in live process audits; (2) experience using standard operating procedures, manuals, and applications used to perform distribution functions; (3) obtaining and maintaining key performance indicators, such as acceptable performance levels (APL); (4) efficient and effective workload planning; (5) coordinating with the government on hand-offs of functions; (6) processing hazardous materials (HAZMAT) in accordance with applicable laws and regulations; and (7) support to local customers. *Id.*

⁵ The protester initially also challenged the agency's findings with respect to the scope of this reference. Comments at 9-12. The agency responded to this aspect of the protester's arguments, see Supp. COS/MOL at 11-12, but the protester did not further

(continued...)

With respect to complexity, the agency noted in its evaluation that this reference described some similar aspects (e.g., use of APLs, inventories, accuracy verification, workload planning, transfer of materials through warehouse processing, and HAZMAT operations), while it did not mention others (e.g., audits, handoffs, and HAZMAT certifications). *Id.* at 31-32; see AR, Supp. Exh. 3, Lakota Performance Confidence Assessment Proposal at 15-18. Based on this consideration of the information in the awardee's proposal, the PPEB concluded that the work under this reference was similar in complexity to the requirements of the solicitation. AR, Exh. 15, PPEB Report Addendum at 31-32. The record also shows that, while the agency found this reference to be not similar in magnitude because it involved performance with 22 FTEs as compared to the 78 FTEs required by the solicitation, the agency nonetheless found it to be relevant based on its similarity in scope and complexity to the required effort. AR, Exh. 15, PPEB Report Addendum at 31-32, 40.

On this record, we find no basis to question the agency's evaluative judgment. First, while the protester contends that the agency's complexity assessment was based solely on the stated use of APLs, see Supp. Comments at 3-8, the agency noted multiple areas of similar work as well as the aspects of work that were dissimilar to the requirement. See AR, Exh. 15, PPEB Report Addendum at 31-32. Moreover, we do not agree that the agency's complexity assessment was arbitrary simply because the work under the reference did not include all of the tasks listed in the solicitation. See Supp. Comments at 4-7. We find that the agency's evaluation sufficiently detailed those aspects of the work performed under the reference found to be similar in complexity to the solicited work. AR, Exh. 15, PPEB Report Addendum at 31-32.

With respect to the agency's determination that the reference was relevant notwithstanding its dissimilar magnitude, we find this to be consistent with the solicitation, which contemplated that relevancy would be determined by considering all three aspects--scope, magnitude of effort, and complexity--together. RFP at 77; see *LinTech Global, Inc.*, B-419107, Dec. 10, 2020, 2020 CPD ¶ 5 at 9 (finding that the agency reasonably determined a past performance reference to be relevant--despite its smaller magnitude--based on its similar scope, where the solicitation clearly contemplated that relevancy would be determined in the aggregate, considering both scope and magnitude together). As noted, the evaluation of the relative merit or relevance of past performance references is generally a matter within the agency's discretion, which our Office will not disturb unless it is shown to be unreasonable or inconsistent with the solicitation's evaluation criteria. *Sayres & Assocs. Corp.*, B-418382, Mar. 31, 2020, 2020 CPD ¶ 134 at 5. Here, we find that the protester's

address scope in its comments, other than to repeat its general contention that this reference is "not at all similar to the current effort in terms of scope, magnitude or complexity." Supp. Comments at 7-8. Arcticom's failure to comment on the agency's substantive response to its arguments related to scope renders this argument abandoned and we will not consider it further. *Booz Allen Hamilton, Inc.*, B-414283, B-414283.2, Apr. 27, 2017, 2017 CPD ¶ 159 at 5 n.9.

challenge to the “similar” complexity assessment, as well as to the overall relevancy determination for this reference, amounts to disagreement with the agency’s reasonable evaluative judgment, which does not establish a basis to sustain the protest.⁶ See *Noble Supply & Logistics, Inc., supra*.

Next, the protester contends that the agency’s assessment of relevancy for Lakota’s second past performance reference (program support for the 10th mountain division’s UME program) was likewise flawed. In this regard, Arcticom asserts that the reference was arbitrarily found to be very similar in magnitude, even though the number of contractor FTEs involved in the reference was significantly less than the solicited effort. Comments at 12-13. The agency responds that the PPEB reasonably found that this reference demonstrated a very similar magnitude. Supp. COS/MOL at 12-13.

The record shows that the agency found this reference to be very relevant overall, based on its very similar magnitude, as well as similar scope and complexity, to the solicited work. AR, Exh. 15, PPEB Report Addendum at 33-34. Regarding magnitude, the PPEB found that the contractor FTEs for the reference ranged from 40 to 102, which was very similar to the 78 FTEs estimated under this solicitation. *Id.* at 33. The PPEB based this finding on the information in Lakota’s proposal stating that, while the requirement under the reference contract is 40 FTEs, the contracted effort was supported by a “series of contracts/task orders” in which 104 of Lakota’s FTEs “move from one contract to the other depending on the deployment status” of organizations within the program. *Id.*; see AR, Supp. Exh. 3, Lakota Performance Confidence Assessment Proposal at 20.

While the protester objects to the agency’s reliance on the awardee’s description of the associated series of contracts and task orders, we find that the agency reasonably relied on this proposal information, which included a list of ten contracts and purchase orders for the referenced contract. See Supp. COS/MOL at 12; AR, Supp. Exh. 3, Lakota Performance Confidence Assessment Proposal at 6. The solicitation provided that similarity in magnitude would be considered in view of the anticipated performance level of approximately 78 contractor FTEs. See RFP at 63. We find no basis to object to the agency’s judgment that Lakota’s reference, involving 40 to 102 FTEs on a flexible staffing arrangement, was very similar in magnitude to the solicited effort. See *Sayres & Assocs. Corp., supra* (the evaluation of the relative merit or relevance of past performance references is generally a matter within the agency’s discretion).

⁶ The protester similarly challenges the scope and complexity determinations for Lakota’s other past performance references, asserting that those references also failed to demonstrate enough of the solicitation’s enumerated tasks to be found similar in scope and complexity to the solicited effort. Comments at 13-15; Supp. Comments at 8-9. Similar to the supply support activity reference, the agency found that each of Lakota’s other references demonstrated a significant portion, but not all, of the tasks enumerated in the solicitation. See AR, Exh. 15, PPEB Report Addendum at 33-36. On this record, we find no basis to object to the agency’s conclusion that these references were similar in scope and complexity.

As a final example, the protester alleges that the agency failed to properly weigh the awardee's fourth reference (for logistics and support services for DLA's Distribution Norfolk Naval Shipyard), which was performed by Lakota's major subcontractor. Comments at 16; Supp. Comments at 10. The protester does not contest the agency's assessment of this reference as very relevant. Comments at 16; Supp. Comments at 10. Instead, the protester contends that, because the past performance was that of a major subcontractor instead of the prime contractor, the reference should have been given less weight than the awardee's other references. *Id.* The protester argues that it was unreasonable for the agency to assign an overall performance confidence assessment rating of substantial confidence to Lakota's proposal based only on the strength of one very relevant subcontractor reference when the remaining references, especially those Lakota performed, were allegedly not relevant. *Id.* The agency responds that the rating was reasonably assigned based on the quality of Lakota's relevant performance record, including the very relevant contract performed by Lakota's major subcontractor. Supp. COS/MOL at 14.

The RFP provided that the agency would consider past performance data of the offeror and its major subcontractors--defined as a subcontractor providing twenty percent of the total dollar threshold or twenty-five percent of the total man-hour effort. RFP at 77. The solicitation also advised that a major subcontractor's past performance reference would "be given weight relative to the percentage of effort being provided by that particular subcontractor in the offer submitted," and that the prime offeror's past performance will be given more weight than major subcontractors' past performance. *Id.*

Here, the agency found the reference performed by Lakota's major subcontractor to be very relevant based on the agency's finding that the contract was very similar in scope, magnitude, and complexity to the solicited work. AR, Exh. 15, PPEB Report Addendum at 37-39. In considering the weight of this reference, the PPEB specifically noted that "Lakota Solutions is the prime contractor and therefore performance under the three (3) prime references provided in the proposal receive more weight than major subcontractor performance." *Id.* at 41. Noting that Lakota's major subcontractor would be "performing approximately 44.44 [percent] of the labor hours and 39.98 [percent] of the total cost," the PPEB found that "[o]ne (1) major subcontractor reference was determined to be very relevant, and one (1) was determined to be somewhat relevant." *Id.* After considering these past performance references, the PPEB concluded that, "[b]ased on the combined recency, relevancy, and quality of the five (5) past performance references evaluated, the Government has a high expectation that the Offeror will successfully perform the required effort." *Id.* On the basis of this conclusion, the PPEB assigned an overall confidence assessment rating of substantial confidence to Lakota's proposal. *Id.*

We find the agency's evaluation here to be reasonable, consistent with the stated evaluation criteria, and well documented. Contrary to the protester's assertion, the contemporaneous record is clear that the agency considered the percentage of work proposed to be performed by Lakota's major subcontractor, mindful that the references

for work performed by Lakota as the prime contractor should “receive more weight than major subcontractor performance.” See *id.* After considering each reference, the evaluators noted that all five of Lakota’s past performance references demonstrated “specific knowledge and experience in the performance of receipt, storage, physical inventory, issue, local delivery, and packaging of a wide variety of commodities using [Department of Safety and Security] or a different [warehouse management system] to accomplish the mission.” *Id.* The evaluators also noted that the contractor performance assessment reporting system ratings for Lakota’s references ranged from satisfactory through exceptional. *Id.* In assigning the overall rating of substantial confidence, the evaluators concluded that they have a high expectation that Lakota will successfully perform the required effort based on the combined recency, relevancy, and quality of the five past performance references. *Id.* To the extent that Arcticom disagrees with the agency’s conclusion after weighing those considerations, such disagreement does not provide a basis to object to the agency’s evaluation. See *Horizon Strategies, LLC*, B-419419.5, B-419419.6, Mar. 15, 2023, 2023 CPD ¶ 71 at 19.

In sum, the record shows that the agency reasonably considered the relevancy of each of Lakota’s past performance references based on their demonstrated similarity in scope, magnitude, and complexity to the solicited effort. The record also shows that the agency considered the quality of each past performance reference submitted by Lakota, as well as whether the reference contract was performed by Lakota or its subcontractor. Accordingly, we deny the protester’s challenge to the agency’s evaluation under the performance confidence assessment factor.⁷

Best-Value Tradeoff

Finally, the protester challenges the agency’s best-value tradeoff analysis. Arcticom first argues that the tradeoff was flawed because it was based on a flawed evaluation. Protest at 52; Supp. Comments at 13. Because, as discussed above, we do not find that the agency erred in its evaluation, we see no merit to this challenge to the agency’s best-value tradeoff decision.

In addition, the protester asserts that the agency’s tradeoff decision was flawed because the SSA failed to consider an “important strength in Arcticom’s proposal” under the staffing approach factor. Protest at 16-19; Comments at 20-24; Supp. Comments

⁷ The protester also alleges that the agency treated offerors disparately in its performance confidence assessment evaluation. Protest at 19-20, 51-52; Comments at 17-19; Supp. Comments at 13. Specifically, the protester argues that, because the awardee’s past performance references were not relevant, the agency treated offerors disparately when it assessed the same performance confidence assessment rating of substantial confidence to both offerors. Comments at 17-19; Supp. Comments at 13. Because, as discussed above, we find the agency reasonably assessed Lakota’s past performance references as meriting a rating of substantial confidence, we see no basis to find that the agency treated offerors disparately by assigning both offerors the same substantial confidence rating.

at 13. In this regard, the protester argues that the SSA improperly ignored Arcticom's "vital" staffing approach strength, when the SSA concluded that "Arcticom's single strength in [the transition and sustainment of operations approach factor], the least important factor," did not warrant paying the price premium. Comments at 20; see AR, Exh. 18, SSD at 18. The protester contends that this erroneous conclusion arbitrarily equalized the offerors' technical merit and resulted in an award being made on a lowest-price, technically acceptable basis. Protest at 19; Comments at 23-24. The agency responds that the SSD clearly shows that the SSA did consider Arcticom's strength under the staffing approach factor, and the agency was not required to discuss that strength in the particular sentence identified by the protester. COS/MOL at 18-19. We agree with the agency.

Where a solicitation provides for award on a best-value tradeoff basis, it is the function of the SSA to perform a price/technical tradeoff, that is, to determine whether one proposal's technical superiority is worth the higher price; the extent to which one is sacrificed for the other is governed only by the test of rationality and consistency with the stated evaluation criteria. *SBG Tech. Solutions, Inc.*, B-410898.9, B-410898.12, June 21, 2016, 2016 CPD ¶ 199 at 5. Where, as here, technical merit is significantly more important than price, an agency may properly select a lower-price, lower-rated proposal if it reasonably decides that the price premium involved in selecting a higher-rated, higher-price proposal is not justified. *Optum Worker's Comp. Servs.*, B-421366, B-421366.2, Apr. 11, 2023, 2023 CPD ¶ 89 at 18. Furthermore, a source selection decision need not address and discuss every evaluated strength and weakness of the competing proposals; rather, the decision must sufficiently document the rationale for business judgments and tradeoffs made by the SSA, and the benefits associated with additional costs. *ManTech TSG-1, J.V.*, B-411253.7, B-411253.8, Mar. 1, 2017, 2017 CPD ¶ 81 at 11. A protester's disagreement with the agency's determination, without more, does not establish that the source selection was unreasonable. *CACI, Inc.-Federal*, B-420441.3, Nov. 5, 2022, 2022 CPD ¶ 278 at 12-13.

The record shows that the SSA reviewed and summarized the findings of the technical evaluation board (TEB) in the SSD and noted her concurrence with each finding. See *generally*, AR, Exh. 18, SSD. As relevant here, the SSA weighed the strength assessed in Arcticom's proposal under the risk management and employee retention subfactor, one of three subfactors under the staffing approach factor. *Id.* at 9. Specifically, the SSA noted that "Arcticom's proposed retention approach [was] advantageous to the Government since a lower turnover rate plays a vital role in retaining key employees and maintaining a skilled, experienced, and capable workforce." *Id.* While concurring with the assessment of this strength and the resulting rating of good for the subfactor, the SSA also agreed with the TEB's finding that "this subfactor rating did not elevate the overall factor rating" above acceptable. *Id.* at 8. As a result, the SSA concluded that "the offerors were considered technically equivalent" under the staffing approach factor. *Id.*

Similarly, under the transition and sustainment of operations approach factor, the SSA again concurred with the TEB's rating of good, which was based on one strength assessed under the continuation of essential contractor services subfactor. *Id.* at 16. The strength was assessed for Arcticom's "ability to exceed workforce recall times [which] will improve response time in moments of crisis and . . . increase mission readiness capability and customer support," benefiting the government "in emergency or workload surge situations." *Id.*

The protester's primary allegation here is based entirely on the SSA's articulation of the tradeoff conclusion that "Arcticom's *single* strength in [the transition and sustainment of operations approach factor]" did not warrant the price premium. Comments at 20, *citing* AR, Exh. 18, SSD at 18 (emphasis added). The protester argues that, because this sentence does not mention the strength Arcticom received under the staffing approach factor, the SSA improperly failed to consider that strength in the tradeoff. *Id.* The record here, however, contradicts the protester's allegation. As noted above, the SSD included a detailed discussion of the TEB's evaluation of proposals under each factor and subfactor, including the assessment of a strength in Arcticom's staffing approach. AR, Exh. 18, SSD at 8-9. Moreover, on the very same page and just two paragraphs above the allegedly problematic language, the SSA noted that "Arcticom is rated 'Good' in subfactor (c): Risk Management and Employee Retention, due to one (1) identified strength," but that the SSEB "determined the strength is not strong enough to elevate the overall [staffing approach factor] rating above" acceptable. *Id.* at 18.

Based in part on this analysis of Arcticom's staffing approach strength, the SSA concluded that "Lakota and Arcticom are rated technically equivalent in [the management approach factor], [staffing approach factor], and [performance confidence assessment factor]." *Id.* at 18. In this context, the SSA's tradeoff conclusion provided as follows:

While Lakota and Arcticom are rated technically equivalent in [management approach factor], [staffing approach factor], and [performance confidence assessment factor], Arcticom is rated "Good" in [the transition and sustainment of operations approach factor], and Lakota is rated "Acceptable." However, Arcticom's price is \$4,330,475.13 (16 [percent]) higher than Lakota's. *Arcticom's single strength in [transition and sustainment of operations approach factor], the least important factor, does not warrant paying a significantly higher price for these services.* While the SSEB found Arcticom's ability to recall and staff the workforce in as little as 4 hours ([vis-à-vis] the requirement of 12 hours) to be a strength, I agree that this does not warrant the additional cost. The workforce would only need recalled in an emergency or workload surge situation where response time is of vital importance[,] these situations would rarely happen.

Id. at 18 (emphasis added).

On this record, we find no support in the record for the protester's contention that the tradeoff improperly failed to consider Arcticom's strength under the staffing approach factor. Instead, the record shows that the SSA duly considered that strength, and reasonably concluded that it was "not strong enough" to raise the rating for the overall factor. Based on this record, we find it reasonable for the SSA to focus her tradeoff on Arcticom's strength under the transition and sustainment of operations approach factor, which did raise that factor rating to good. Moreover, having documented her conclusion that Arcticom's staffing approach strength was "not strong enough," the SSA was not obligated to then discuss it again in her tradeoff consideration. See *ManTech TSG-1, J.V., supra*. To the extent the protester disagrees with the agency's conclusion that Arcticom's technical strengths did not warrant the payment of the higher price, such disagreement with the agency's reasoned judgment does not form a basis to sustain the protest. See *CACI, Inc.-Federal, supra*.

The protest is denied.

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General Counsel