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Decision

Matter of: Guidehouse Inc.

File: B-423156.2

Date: May 22, 2025

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DIGEST

1. Protest challenging the evaluation of the protester's and awardee's past performance is denied where the agency's evaluation was reasonable and consistent with the terms of the solicitation.
 2. Protest that the agency performed a flawed best-value determination is denied where the agency's tradeoff was reasonable and consistent with the terms of the solicitation.
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DECISION

Guidehouse Inc., of McLean, Virginia, protests the issuance of an order to BDO Public Sector, LLC, (BDO) of McLean, Virginia, under request for quotations (RFQ) No. 70RCSJ24Q00000072, issued by the Department of Homeland Security, Cybersecurity & Infrastructure Agency (CISA), for internal control assessment and remediation management support services. The protester contends that the agency's evaluation of the protester's and awardee's quotations was unreasonable, and resulted in a flawed best-value decision.

We deny the protest.

BACKGROUND

On July 19, 2024, the agency issued the RFQ for the placement of an order under the General Services Administration Multiple Award Schedule, Special Item Number 541219 (Budget and Financial Management Services), for internal control support services for the CISA Office of Chief Financial Officer Internal Control Subdivision. Agency Report (AR), Tab 3.a, Statement of Work (SOW) at 1-2. The RFQ, which the agency amended once, contemplated issuance of a hybrid fixed-price/time-and-materials task order with an anticipated task order term of one base year, and two, 1-year options. *Id.* at 2; Contracting Officer's Statement at 2.

The RFQ provided that award would be made on a best-value tradeoff basis considering price and three non-price factors (which are listed in descending order of importance): management and staffing approach; past performance; and price. AR, Tab 4.h, RFQ, amend. No. 1, Updated RFQ Provisions, at 9-10. When the non-price evaluation factors were combined, they were more important than the price factor. *Id.* at 10. The RFQ, however, further advised vendors that the agency would not issue an award to a vendor "who presents a considerably higher overall price to achieve only slightly better performance capabilities. Consequently, as non-price evaluations become more equal, price may be of greater significance in the trade-off consideration." *Id.* Only the past performance factor is relevant to the issues presented in this protest.

As to past performance, vendors were to provide up to three past performance references that demonstrated at least two years of experience performing the type of work described in the statement of work (SOW). *Id.* at 8. The past performance references needed to include work similar in nature to the requirement and be drawn from work ongoing or completed within the previous five years from the date of RFQ release. *Id.*

For the past performance factor, the agency would evaluate the relevance of past performance and how well the vendor performed. *Id.* at 10. The agency would consider past performance relevant if it was like the solicitation's requirement in both size (dollar value and number of staff supporting the requirement) and scope (work that is like the SOW). *Id.* The more relevant the past performance, the stronger predictor of future success and, thus, more influence on the past performance risk assessment. *Id.* The agency would provide one rating under this factor according to the following scale:

Confidence Level Rating	Definition
Low Risk	The Quoter's record of past performance indicates there is very little risk associated with receiving timely services of the highest quality. The Quoter's past performance shows a pattern of consistency in successful performance of quality, schedule, cost control and management, indicating the Quoter will likely meet or possibly exceed the requirements of the task order.
Medium Risk	The Quoter's record of past performance indicates that there is some potential risk associated with receiving timely services of the highest quality. The Quoter's past performance reflects instances of inconsistency in successful performance of quality, schedule, cost control and management, indicating the Quoter may not meet the requirements of the task order.
High Risk	The Quoter's record of past performance shows a pattern of poor past performance, including quality, schedule, cost control and management, indicating a high likelihood that the Quoter will consistently fail to meet the requirements of the task order.
Neutral	Quoter has no relevant or recent past performance, or there is no record of past performance of Quoter available for evaluation.

Id. at 11-12.

The agency received six quotations, including one from the protester and BDO. See AR, Tab 14, Corrective Action Award Decision, at 4. On October 25, 2024, following evaluations, the agency notified the protester that it had issued the subject order to BDO. AR, Tab 8, Notice of Award. In response to Guidehouse's request for a brief explanation, the agency disclosed the following evaluation results for BDO and Guidehouse:

Contractor	Factor 1 (Management & Staffing Approach)	Factor 2 (Past Performance)	Factor 3 (Price)	Quoted Price
BDO	High Confidence	Low Risk	Reasonable	\$10,196,570.06
Guidehouse	High Confidence	Low Risk	Reasonable	\$13,345,430.25

AR, Tab 9, Brief Explanation, at 1.

On November 4, Guidehouse filed a protest with our Office, which we docketed as B-423156. AR, Tab 12, Corrective Action Tech. Eval. Rep. at 2. On November 27, the agency filed a request to dismiss the protest as academic based on the agency's proposed corrective action to reevaluate quotations and conduct a new best-value determination. AR, Tab 10, Notice of Corrective Action & Req. to Dismiss. We subsequently dismissed the protest as academic. See *Guidehouse, Inc.*, B-423156 (Dec. 3, 2024) (unpublished decision).

As part of the corrective action, both the technical evaluation team (TET) and business evaluation committee (BEC) met to reevaluate Guidehouse's and BDO's quotations under the non-price evaluation factors. The TET completed its reevaluation and issued an updated technical evaluation report for the management and staffing approach; the ratings for this factor did not change. AR, Tab 12, Corrective Action Tech. Eval. Rep. at 2.

As to past performance, the BEC confirmed the prior low risk ratings assigned to both vendors, but also provided a detailed analysis of the recency, relevance, and quality for each past performance reference for each vendor. In terms of relevance, the BEC first considered the dollar value of the reference, the percentage of work completed by the performing entity (either the prime vendor itself or one of its proposed subcontractors), as well as the number of full-time equivalents employed by the performing entity. See, e.g., AR, Tab 13, Corrective Action Past Perf. Eval. Rep. at 5. Based on this initial relevance analysis, the BEC determined that two of BDO's past performance references, one for itself and one for a proposed subcontractor, were relevant, and all three of Guidehouse's references, two for itself and one for a proposed subcontractor, were relevant. See *id.* at 10-11, 28.

For each relevant reference, the BEC next considered the percentage of tasks performed under the past performance reference as compared to the tasks required by the SOW for the instant requirement. A summary of the BEC's analysis is as follows:

SOW Task	Relevance	
	Relevant	Not Relevant
BDO Reference #1		
Task 1	X (76% of tasks)	
Task 2	X (44% of tasks)	
Task 3	X (100% of tasks)	
Task 4	X (100% of tasks)	
Task 5		X (0% of tasks)
BDO Reference #3 (for subcontractor)		
Task 1	X (70%)	
Task 2	X (33%)	
Task 3	X (100%)	
Task 4	X (100%)	
Task 5	X (75%)	

Id. at 4-5, 8-10.

SOW Task	Relevance	
	Relevant	Not Relevant
Guidehouse Reference #1		
Task 1	X (100% of tasks)	
Task 2	X (88% of tasks)	
Task 3	X (100% of tasks)	
Task 4	X (100% of tasks)	
Task 5	X (100% of tasks)	
Guidehouse Reference #2		
Task 1	X (82%)	
Task 2	X (55%)	
Task 3	X (100%)	
Task 4	X (100%)	
Task 5		X (0%)
Guidehouse Reference #3 (for subcontractor)		
Task 1	X (94%)	
Task 2	X (44%)	
Task 3	X (100%)	
Task 4	X (100%)	
Task 5	X (75%)	

Id. at 23-28.

In assigning BDO an overall low risk rating, the BEC recognized that, between both of its references, BDO demonstrated relevant experience with the type of work required by the SOW, “though relevance to Task 2 and Task 5 [were] on the lighter side as a whole.” *Id.* at 10. The BEC, however, explained that the lack of relevant experience with some subtasks, while noted, did “not present a genuine concern about ability to perform them,” and that both BDO and its subcontractor had both demonstrated their ability to lead performance related to at least tasks 1 through 4, and BDO’s proposed subcontractor had relevant experience performing task 5. *Id.* at 10-11.

The source selection official’s subsequent award decision reaffirmed the award to BDO. AR, Tab 14, Corrective Action Award Decision Document at 10. The contracting officer, who was the source selection official, expressly agreed with the BEC’s past performance evaluation findings. *Id.* at 3. In his tradeoff analysis, the contracting officer expressly recognized that Guidehouse, the incumbent, had more relevant past performance and other non-price advantages based on its incumbency, but those benefits were not worth a \$3.1 million (or 23.6 percent) price premium. Specifically, the contracting officer explained that:

While Guidehouse Inc. does show both strong institutional knowledge of CISA’s Internal Controls program (and is the incumbent, automatically presenting less transition risk) and provided more references of performing similar work as a prime contractor, I do not believe this is worth an extra \$3.1 [million]. The CISA Internal Controls program has matured, and the

risk of stoppage or complete failure due to transitioning to a new team is minimal. While BDO does not have the same depth of experience with this requirement as Guidehouse, their experience was enough to garner a Low Risk rating and the Government has no concerns that BDO has the experience to provide quality work. Therefore, Guidehouse Inc.'s solution is not worth the 23.60 [percent] price premium compared to BDO Public Sector LLC's Quote.

AR, Tab 14, Corrective Action Award Decision, at 9.

On February 10, 2025, the agency notified Guidehouse that it had confirmed award to BDO. AR, Tab 15, Second Notice of Award, at 1. On February 10, the agency provided the protester a brief explanation. AR, Tab 16, Brief Explanation to Guidehouse at 1. This protest followed.

DISCUSSION

Guidehouse raises two primary protest grounds.¹ First, the protester challenges the reasonableness of the agency's past performance evaluation. Comments at 2. Second, the protester argues that the agency's best-value tradeoff is flawed, contending that the agency unreasonably found the awardee to be low risk under the past performance factor and that the agency unreasonably elevated the importance of price in making its selection decision. *Id.* at 9. We find no basis to sustain the protest.

Past Performance Evaluation

Guidehouse argues that the agency's past performance evaluation of both the awardee's and protester's past performance references was unreasonable.² Regarding

¹ Guidehouse also initially alleged that (i) the agency misevaluated its proposal under the staffing and management approach factor, and (ii) BDO should have received a lower past performance rating based on alleged adverse performance about BDO's corporate parent, but the protester subsequently withdrew those allegations. See Comments at 1 n.1.

² The protester raises other collateral arguments. While this decision does not specifically address all of the protester's arguments, we find that none provides a basis on which to sustain the protest. As one example, the protester argues that the agency, in assigning the awardee a low risk past performance rating, ignored BDO's lack of past performance references involving work for the Department of Homeland Security (DHS), which Guidehouse argues was required by the RFQ. Comments at 7. We find no merit to this argument. First, the relevant past performance evaluation criteria did not specifically limit relevance only to prior work performed for DHS. In this regard, the RFQ only required offerors to demonstrate past performance that included work "similar in nature to this requirement." AR, Tab 4.h, RFQ, amend. No. 1, Updated RFQ Provisions, at 8. As discussed herein, the agency reasonably evaluated past

(continued...)

the awardee's quotation, the protester asserts that the agency unreasonably evaluated the relevance of BDO's past performance references and the agency overlooked the risks of BDO's allegedly limited past performance record. Comments at 2-9. The protester also contends that the agency's evaluation of the protester's quotation was unreasonable because the agency failed to properly consider the qualitative differences between itself and the awardee's past performance. *Id.* at 9-11. The agency maintains that its past performance evaluation of both quotations was reasonable and in accordance with the terms of the RFQ, and that the protester's allegations reflect nothing more than Guidehouse's disagreement with the agency's evaluation. Memorandum of Law at 3. As addressed below, we find no basis on which to sustain the protest.

When a protester challenges an agency's past performance evaluation, we will review the evaluation to determine if it was reasonable and consistent with the solicitation's evaluation criteria, and procurement statutes and regulations, and to ensure that the agency's rationale is adequately documented. *D&G Support Services, LLC*, B-419245, B-419245.3, Jan. 6, 2021, 2021 CPD ¶15 at 8. An agency's evaluation of past performance, including its consideration of the relevance, scope, and significance of a vendor's performance history, is a matter of discretion, which we will not disturb unless the agency's assessments are unreasonable or inconsistent with the solicitation criteria. See *Sterling Medical Associates, Inc.*, B-418674, B-418674.2, July 23, 2020, 2020 CPD ¶ 255 at 8. A protester's disagreement with the agency's judgment, without more, does not establish that an evaluation was unreasonable. *FN Mfg., LLC*, B-402059.4, B-402059.5, Mar. 22, 2010, 2010 CPD ¶104 at 7.

performance references for relevance considering size, scope, and complexity as compared to the requirements of the SOW.

Second, we also find no basis for the protester's intimation that the SOW imposed additional past performance relevance requirements beyond the solicitation's stated evaluation criteria. Specifically, the protester argues that the agency was required to evaluate specific demonstrated knowledge with each of the multitude of federal laws and policies enumerated in the SOW, most namely the DHS Financial Accountability Act (DHS FAA). In support of this position, the protester highlights the section of the SOW, which explained that the contractor must possess a comprehensive and working knowledge of federal laws and policies with respect to internal controls, including the DHS FAA. AR, Tab 4.c, RFQ, amend. 1, Updated SOW, at 1-2. We do not agree. Rather, the agency reasonably considered relevance on the basis of a vendor's demonstrated experience with federal internal control laws and policies generally, absent a specific solicitation requirement for vendors to demonstrate specific experience with each enumerated law or policy. Additionally, we note that the agency specifically credited Guidehouse in the tradeoff with its "strong institutional knowledge of CISA's Internal Controls program" and depth of experience garnered as the incumbent. AR, Tab 14, Corrective Action Award Decision, at 9.

The RFQ instructed vendors to submit up to three past performance references “drawn from work ongoing or completed within the previous five (5) years from the date of solicitation release.” AR, Tab 4.h, RFQ, amend. No. 1, Updated RFQ Provisions, at 8. The RFQ required the references to include work similar in nature to the requirement. *Id.* Past performance would be considered relevant if it was “like the requirement in both size (dollar value and number of staff supporting the requirement) and scope (work that is like the SOW).” *Id.*

The RFQ explained that the agency would assess each past performance reference to determine the likelihood of the vendor successfully performing the prospective task order. *Id.* at 10. The agency’s assessment would consider whether the past performance reference was relevant as well as the reference’s history of quality, schedule, cost control, and management. *Id.* To evaluate relevance, the BEC assessed each past performance reference to determine if it demonstrated performance of five of the eight tasks required by the RFQ.³ *Id.* In addition to the information provided, the agency’s evaluation would also consider information provided through electronic government databases including, but not limited to, the Contractor Performance Assessment Reporting System (CPARS).⁴ *Id.* The agency would then determine the level of risk for a vendor’s potential performance based on the vendor’s overall relevant past performance. *Id.*

As discussed above, BDO submitted three past performance references in its quotation, two of which the agency found to be recent and relevant in scope and size. AR, Tab 13, Past Performance Report at 10. The BEC, after reviewing the quality information available for these two recent and relevant references, ultimately concluded that BDO’s past performance presented low risk to the government. Specifically, the BEC determined that:

The past performance references were all found to be recent. Reference [No.] 1 and [No.] 3 were found to be relevant in size, but reference [No.] 2 had too few FTE’s [full-time equivalents] to be considered relevant in size. Between all references, relevance in scope to CISA’s requirement was

³ The SOW includes eight tasks: (1) internal control assessment, corrective action planning, and remediation support; (2) data analytics and automation technical support; (3) technical support; (4) project management; (5) audit liaison (optional); (6) surge internal control assessments and remediation special projections (optional); (7) software licenses; and (8) travel. AR, Tab 4.c, RFQ, amend. No. 1, Updated SOW, at 2-8. Because task six was identical in scope to tasks one and four, and tasks seven and eight were not to be evaluated under the past performance factor, only the first five tasks were assessed for relevance. AR, Tab 13, Corrective Action Past Performance Report, at 4 n.1.

⁴ The CPARS evaluation consisted of six evaluative areas: quality; schedule; cost control; management; small business subcontracting; regulatory compliance; and other: product/service delivery. *Id.* at 6; Federal Acquisition Regulation (FAR) 42.1503(b)(2).

demonstrated, though relevance to Task 2 and Task 5 are on the lighter side as a whole. The lacking relevance in some sub-tasks is noted, but does not present a genuine concern about ability to perform them as written in the SOW. The quality of each reference was found to be positive, with each rated factor being given a “Very Good” or “Exceptional” rating. . . . Of the two references relevant in size, one was led by BDO as the prime and one was led by their proposed subcontractor [] as the prime. While [BDO’s subcontractor] is the only reference that showed performance related to Task 5, both BDO and [BDO’s subcontractor] demonstrated leading performance related to tasks 1 – 4. Due to all factors discussed above, we have rated BDO PUBLIC SECTOR, LLC as LOW RISK for this past performance evaluation.

Id. at 10-11. The contracting officer expressly concurred with the BEC’s past performance evaluation. AR, Tab 14, Corrective Action Award Decision Document at 3.

Guidehouse also submitted three past performance references, all three of which the agency found to be relevant in scope and size. AR, Tab 13 Corrective Action Past Performance Report at 28. With respect to Guidehouse’s past performance references, the evaluators found the following:

The past performance references were found to be recent, relevant in size, and relevant in scope to CISA’s requirement though relevance to Task 5 is on the lighter side as a whole. The lacking relevance in some sub-tasks is noted, but does not present a genuine concern about ability to perform them as written in the SOW. Guidehouse led all work as prime in the submitted references. The quality of each reference was found to be positive, with each rated factor being given an “Exceptional” rating. Therefore, we have rated GUIDEHOUSE LLP as LOW RISK for this past performance evaluation.

Id. Based on its review, the agency assigned an overall past performance risk rating of “low risk” for Guidehouse. *Id.* The contracting officer expressly concurred with the BEC’s evaluation of Guidehouse’s past performance. AR, Tab 14, Corrective Action Award Decision Document at 3.

The contracting officer in conducting his tradeoff analysis also expressly recognized that Guidehouse’s past performance was superior to BDO’s past performance. Specifically, the contracting officer explained that “BDO does not have the same depth of experience with this requirement as Guidehouse,” and Guidehouse demonstrated a “strong institutional knowledge of CISA’s Internal Controls program.” *Id.* at 9.

In challenging the evaluation of the awardee’s past performance references, the protester first argues that the agency unreasonably evaluated the relevance of each of BDO’s past performance references and that the awardee should have at best, received

an overall rating of “neutral.”⁵ Comments at 6. In support of its contention, the protester asserts that the awardee’s first reference should not have been evaluated as relevant in terms of scope because, by the agency’s own account, BDO did not demonstrate relevant work for a majority of the sub-tasks under tasks two and five. *Id.* at 3-5. The protester also argues that BDO’s third reference should not have been considered because it was noncompliant with the RFQ’s instructions--the reference consisted of two separate task orders and, thus, exceeded the maximum limit of submittable past performance references. *Id.* at 5-6.

The agency responds that its evaluation of BDO’s past performance was reasonable, referencing multiple ways in which the contemporaneous evaluation record shows that BDO’s references exhibited work relevant to the five measured tasks, and argues that the protester’s assertions amount to disagreement with its conclusions. Agency Supp. Briefing at 4-7. The agency further contends that it reasonably considered the totality of past performance information when assessing risk, as opposed to requiring each reference to independently demonstrate experience with all five SOW tasks. For example, the agency similarly found Guidehouse’s second reference relevant even though it did not reflect experience relevant to task 5 and only demonstrated relevant experience with some subtasks under tasks 1 and 2. See AR, Tab 13, Corrective Action Past Performance Report, at 7-8. The agency also argues that it found the awardee’s third past performance reference compliant with the terms of the RFQ and reasonably considered the reference during the agency’s past performance evaluation. Agency Supp. Briefing at 9-11.

We find no basis to question the agency’s evaluation of BDO’s first past performance reference. In accordance with the RFQ, the agency considered the reference’s relevance in terms of the size and number of FTEs employed, and the scope of the tasks and subtasks required under the RFQ. Regarding the scope analysis, the agency found the reference reflected work that was relevant to four of the five measured tasks. AR, Tab 13 Corrective Action Past Performance Report at 4. More specifically, the agency acknowledged the reference’s lack of relevance to certain aspects of tasks 2 and 5, but overall assessed the reference to be relevant in size and scope. *Id.* at 10-11; See *PricewaterhouseCoopers LLP; IBM U.S. Federal*, B-409885 *et al.*, Sept. 5, 2014, 2014 CPD ¶ 289 at 10 (agency reasonably considered identified contracts similar in either size, scope, or complexity, and the solicitation did not require that each past performance reference meet all of the relevance criteria in order to be considered). On

⁵ The protester, in addition to its arguments regarding the awardee’s first and third references, argues that the agency improperly considered BDO’s second reference. As noted above, however, the past performance report and award decision document make clear that the agency did not consider BDO’s second reference to be relevant in size and did not consider the reference in its evaluation. See, e.g., AR, Tab 13, Corrective Action Past Performance Report, at 10 (“Reference [No.] 1 and [No.] 3 were found to be relevant in size, but reference [No.] 2 had too few FTE’s to be considered relevant in size.”). Because this argument is based on a factual inaccuracy inconsistent with the contemporaneous evaluation record, we do not address it further.

this record, the agency reasonably considered the relevance of the reference, concluding that it demonstrated a substantially similar scope to warrant a rating of relevant. The protester's argument that the reference should not be considered relevant because of the agency's findings regarding tasks 2 and 5 is no more than disagreement with the agency's judgment.

The protester argues that BDO submitted more than three past performance references, in contravention of the RFQ. Specifically, Guidehouse argues that BDO's third past performance reference consists of two separate past performance references, which, when counted with the other two past performance references, exceeded the three reference limit set forth in the RFQ. Supp. Briefing at 4. To support its argument, the protester notes that the third reference consists of two separate task orders placed under an indefinite-delivery indefinite-quantity (IDIQ) contract with each separate order involving different scopes of work, periods of performance, and numbers of FTEs. *Id.* at 5. We are not persuaded by the protester's argument. Nothing in the RFQ establishes that a single reference for an IDIQ contract would be evaluated with respect to individual orders placed under the IDIQ contract. Absent such a provision, the record reflects the agency reasonably concluded that the second order was a logical "follow-on" effort for the same scope of the work performed under the first order, and thus reflected a singular effort across the period of both orders. AR, Tab 13, Corrective Action Past Performance Report, at 10-11. Because the terms of the RFQ did not require the agency to classify the protester's third reference as two separate references, this protest ground is denied.⁶

The protester also argues that the agency failed to properly consider the qualitative differences between the protester's and awardee's past performance records. Supp. Briefing at 8. In this regard, the protester argues that it should have received a higher rating than the awardee because the protester's references were more relevant, showed DHS-specific experience as a prime contractor, and were for a larger dollar value which required more FTEs to perform. *Id.* at 8-9.

⁶ Even assuming for the sake of argument that the agency should only have considered one of the two related, sequential orders, we cannot discern any reasonable possibility of competitive prejudice where either order, standing alone, would arguably be relevant in terms of the size and number of FTEs employed as compared to the requirements of this procurement. Competitive prejudice is an essential element of any viable protest, and where none is shown or otherwise evidence, we will not sustain a protest, even where a protester may have shown that an agency's actions were arguably improper. *Interfor US, Inc.*, B-410622, Dec. 30, 2014, 2015 CPD ¶ 19 at 7. Here, the number of FTEs and the size of the effort, when adjusting for the different periods of performance of this requirement and the challenged reference, would be comparable to this requirement for either of the orders at issue. See AR, Tab 13, Corrective Action Past Performance Report, at 8. Thus, on this record, we can discern no reasonable possibility of prejudice even if we were to accept the protester's argument, and therefore, find no basis on which to sustain the protest.

We find Guidehouse's assertion that the agency's evaluation of its past performance was unreasonable to be unsupported by the record. As noted above, the agency established "low risk" as the highest rating for past performance. AR, Tab 4.h, RFQ, amend. No. 1, Updated RFQ Provisions, at 11-12. Where, as here, a protester complains that its quotation should have been assigned a higher rating than the highest rating available under the terms of the RFQ, its fails to state a valid basis of protest. See, e.g., *Hendall, Inc.*, B-417513.3, B-417513.4, Feb. 24, 2020, 2020 CPD ¶ 87 at 9-10 (where a solicitation defines the highest possible past performance rating and the protester receives that rating, the protester's assertion that it should have received greater credit than the solicitation contemplated fails to state a valid basis of protest); *22nd Century Techs., Inc.--Recon.*, B-416669.7, Nov. 14, 2019, 2019 CPD ¶ 385 at 4 (same). Beyond its disagreement as to the adjectival ratings assigned to the quotations, the protester's argument also ignores the contemporaneous record, which reflects that the BEC and contracting officer expressly recognized Guidehouse's superior past performance. As noted, the contracting officer's award decision expressly recognized that "BDO does not have the same depth of experience with this requirement as Guidehouse." AR, Tab 14, Corrective Action Award Decision, at 9. Thus, the protester's argument that the agency failed to consider qualitative differences between the vendors' past performance selectively ignores the contemporaneous record.

In sum, we find the agency's past performance evaluation of both vendors to be both well-reasoned and thoroughly documented. Accordingly, we find no reason to question the agency's evaluation judgments as to the relevance and quality of either vendor's past performance. See *D&G Support Services, LLC*, *supra* at 9 (an agency's evaluation of past performance is, by its nature, subjective, and that evaluation, including the agency's assessments of relevance, scope, and significance, are matters of discretion that we will not disturb absent a clear demonstration that the assessments are unreasonable or inconsistent with the solicitation criteria); see also *FN Mfg., LLC*, *supra* at 7 (a protester's disagreement with the agency's judgment, without more, does not establish that an evaluation was unreasonable).

Best-Value Determination

The protester also contends that the agency conducted a flawed best-value determination because it was based on the allegedly unreasonable underlying past performance evaluation. The protester also contends that a reasonable tradeoff would have considered Guidehouse's superior past performance worth the associated price premium in light of the solicitation's evaluation scheme where the non-price factors were more important than price. Supp. Briefing at 10. We find no basis on which to sustain the protest.

Source selection officials in best-value procurements have broad discretion in making price/technical tradeoffs, and the extent to which one may be sacrificed for the other is governed only by the tests of rationality and consistency with the solicitation's evaluation criteria. *Booz Allen Hamilton, Inc.*, B-422823, B-422823.2, Nov. 18, 2024,

2024 CPD ¶ 272 at 8. An agency may properly select a lower-rated, lower-priced quotation or proposal where it reasonably concludes that the price premium involved in selecting a higher-rated quotation or proposal is not justified in light of the acceptable level of technical competence available at a lower price, even where price is the least important factor. *Id.*; *Angel Menedez Env't'l Servs., Inc.*, B-310340.2, Apr. 11, 2008, 2008 CPD ¶ 73 at 3 n.1.

As addressed above, the agency reasonably evaluated the vendors' past performance, and the contracting officer expressly considered the unique strengths offered by Guidehouse's quotation. Specifically, the tradeoff expressly recognized that Guidehouse demonstrated strong institutional knowledge, presented less transition risk as the incumbent, and had more in-depth past performance than BDO. AR, Tab 14, Corrective Action Award Decision, at 9. Ultimately, however, the contracting officer did not believe the protester's evaluated advantages warranted a \$3.1 million (or more than 26 percent) price premium because the risk of stoppage or complete failure during transition was low, and the agency had no concerns about whether BDO had the experience necessary to provide quality work. *Id.* In short, the record disproves the protester's assertion that the agency did not look behind the adjectival ratings and credit Guidehouse for its superior past performance. The protester's disagreement with the source selection official's subjective business judgment as to the competing merits of the quotations and ultimate price/technical tradeoff, without more, does not render the tradeoff decision unreasonable. *Preferred Sys. Solutions*, B-291750, Feb. 24, 2003, 2003 CPD ¶ 56 at 5. Because the agency's determination was reasonable, consistent with the RFQ and applicable procurement laws and regulations, we find no basis to sustain the protest.

The protest is denied.

Edda Emmanuelli Perez
General Counsel