

VA Office of Inspector General

OFFICE OF AUDITS AND EVALUATIONS



# Department of Veterans Affairs

*Review of  
Secure VA-Chief  
Information Security  
Officer Support Services  
Acquisition Process*

December 20, 2011  
11-01508-24

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**Date:** December 5, 2011

**From:** Assistant Inspector General for Audits and Evaluations (52)

**Subj:** Final Report: *Review of Secure VA-Chief Information Security Officer Support Services Acquisition Process*

**To:** Executive Director for Acquisition, Logistics, and Construction (001ALC)  
Assistant Secretary for Information and Technology (005)

1. As a result of our evaluation of the *Secure VA-Chief Information Security Officer Support Services* acquisition process, we determined VA's proposal evaluation and contract award procedures demonstrated a potential bias toward the incumbent, Booz-Allen Hamilton, and did not promote full and open competition in accordance with the Federal Acquisition Regulation. We are sending this memorandum to alert you of issues and to make recommendations for improving future VA acquisitions of information technology products and services.
2. On September 1, 2010, the Department of Veterans Affairs issued the Request for Quotations (RFQ), *Secure VA-Chief Information Security Officer Support Services*, Solicitation Number VA118-10-RQ-0742. The RFQ's objective was to acquire services for improving and supporting VA's information security, privacy, and risk management programs and to support the daily activities and responsibilities of the Office of Information Protection and Risk Management. Three contractors submitted bids in response to the RFQ. VA awarded the contract to Booz-Allen Hamilton for \$133 million on September 28, 2010. VA received no formal protests in awarding this contract. We evaluated the Secure VA acquisition to determine whether the solicitation, proposal evaluation, and contract award processes were conducted in line with full and open competition requirements. To conduct our evaluation, we reviewed the RFQ and related documents, developed a timeline of events related to the acquisition, and identified and interviewed relevant personnel.
3. We concluded VA used knowledge of VA procedures and practices as a significant selection factor without clear disclosure of its relative importance in the RFQ. The technical evaluation process favored awarding the contract to the incumbent, Booz-Allen Hamilton, based on its performance as VA's Information Assurance and Information Technology Security Services contractor for the past two years. This was counter to Federal Acquisition Regulation Section 15.304(b/d), which states that evaluation factors and significant subfactors must represent key areas of importance and emphasis for consideration in the source selection decision. Further, the regulation states that while evaluation factors and subfactors are within the broad discretion of agency acquisition officials, it is required that all factors that will affect contract award and their relative importance be clearly stated in the solicitation.

4. RFQ Section E.5, “*Proposal Submission Instructions*,” stated that knowledge of VA procedures should be included in contractors’ personnel qualifications; however, this passing reference was not a clear disclosure of key evaluation factors in accordance with the Federal Acquisition Regulation. More importantly, the solicitation’s “*Factors To Be Evaluated*” section made no reference to the importance of VA-specific experience during the evaluation and selection process. The four evaluation factors outlined in the RFQ were technical, past performance, cost, and veterans’ involvement—all stated in order of level of importance in the evaluation and selection process. Examination of the Selection Decision Document revealed the technical evaluation of vendors’ proposals focused on three underlying factors: understanding of the problem, feasibility of approach, and completeness.
  
5. Documentation shows that the panel considered knowledge or unfamiliarity of VA procedures and practices as “strengths” or “weaknesses” in assessing the “understanding of the problem” requirement in the RFQ. As a result, the panel assigned nine “significant strengths” to the Booz-Allen Hamilton proposal; six of those “strengths” made specific references to knowledge of VA procedures and practices. No other vendor proposal received more “strengths” based on prior knowledge of VA practices. However, the lack of knowledge of VA procedures and practices was identified as a weakness in the evaluation of other offerors. The strengths and weaknesses associated with knowledge of VA procedures and practices were key factors in the decision to award the contract to Booz-Allen Hamilton.

Table 1 compares the total number of “strengths” and “weaknesses” assigned each offeror and identifies the scores that make specific references to knowledge of VA procedures and practices.

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**Table 1. Technical Knowledge Scores by Bidder**

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| <b>Bidder</b>       | <b>Technical Knowledge Ratings</b>       |                                           |
|---------------------|------------------------------------------|-------------------------------------------|
|                     | <b>Strengths<br/>Total / VA Specific</b> | <b>Weaknesses<br/>Total / VA Specific</b> |
| Booz-Allen Hamilton | 9 / 6                                    | 0                                         |
| Offeror A           | 3 / 1                                    | 5 / 2                                     |
| Offeror B           | 7 / 4                                    | 4 / 1                                     |

6. Organizational knowledge can be a key consideration in evaluating vendor proposals and a deciding factor where multiple bids are indistinguishable. However, as explained in the Federal Acquisition Regulation 15.304, such knowledge should not be a justification for assigning strengths and weaknesses without first identifying the criteria as a significant evaluation factor in the RFQ. As demonstrated in Table 1, knowledge of VA procedures and practices was the most significant evaluation factor in determining the best overall technical proposal. The Department’s failure to disclose knowledge of VA procedures and practices as

a significant evaluation factor prevented all vendors from submitting comparable proposals and placed potential contractors at a disadvantage in the bidding process. In other cases, proposals received a “weakness” because of the following: *“The Offeror did not list the examples of their past VA technical experience.”* and *“...the Offeror’s proposal did not demonstrate a detailed knowledge of VA policies and procedures.”*

7. Inconsistencies among the vendor evaluations and supporting justification statements also appeared to promote the award in favor of the incumbent contractor, Booz-Allen Hamilton. For example, VA penalized offeror B for proposing the use of certain network monitoring tools, but did not penalize Booz-Allen Hamilton for suggesting use of the same tools in its proposal. Further, VA rated another offeror’s experience with the Department’s Certification and Accreditation process as a “significant strength,” while at the same time citing the experience as a “significant weakness” because the offeror did not provide adequate detail about it in its proposal. Assigning the significant weakness cancelled the significant strength for this offeror in the area of VA knowledge and experience and favored the incumbent.
8. VA traded off lower cost in favor of vendors’ technical knowledge of VA procedures and practices in evaluating the offers. The best overall vendor proposal was selected based on the four evaluation factors—technical, past performance, cost, and veterans’ involvement—outlined in the RFQ. As described in Table 2, Booz-Allen Hamilton’s proposal was the highest cost option; however, the weighting of its knowledge and experience with VA procedures and practices was a key factor in Booz-Allen Hamilton winning the technical evaluation and ultimately the contract award decision. According to VA’s selection decision document, the benefits identified in Booz-Allen Hamilton’s proposal justified awarding it the contract at a premium price over the other two offerors.

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**Table 2. VA Contract Bidder Assessments**

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| <b>Bidder</b>       | <b>Technical Evaluation</b> | <b>Past Performance</b> | <b>Veterans Involvement</b> | <b>Cost</b>   |
|---------------------|-----------------------------|-------------------------|-----------------------------|---------------|
| Booz-Allen Hamilton | Outstanding                 | Low Risk                | Some Consideration          | \$133,092,265 |
| Offeror A           | Acceptable                  | Low Risk                | Some Consideration          | \$108,878,856 |
| Offeror B           | Good                        | Low Risk                | Some Consideration          | \$114,965,326 |

If knowledge of VA procedures and practices had not been used as a key evaluation factor, another vendor might have won the contract at lower cost to the Government.

9. We recommend the Executive Director for Acquisition, Logistics, and Construction ensure that Contracting Officers verify that Requests for Quotations clearly identify all significant factors for evaluating vendor proposals. We further recommend that the Executive Director, in coordination with the Assistant Secretary for Information and Technology, institute management oversight controls to ensure future evaluation panels assess vendor proposals based solely on evaluation factors stated in solicitations for information technology products and services.
10. We conducted our review in accordance with *Quality Standards for Inspections* published by the Council of the Inspectors General on Integrity and Efficiency. We planned and performed the review to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our review objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our review objective.
11. Management Comments and OIG Response: The Executive Director of the Office of Acquisition, Logistics, and Construction generally disagreed with our findings. We address Management’s key comments in the discussion below. The Executive Director’s comments in their entirety are located in Appendix A of this report.
  - a) We disagree with Management’s assertion that the technical evaluation panel did not place greater emphasis on “Knowledge of VA procedures” than on any other factors in evaluating the vendors’ proposals, and that seven of the nine “significant strengths” awarded to Booz-Allen Hamilton made limited or no mention of the contractor’s VA experience. As previously discussed, our examination of the Selection Decision Document showed that the technical evaluation panel either specifically or implicitly considered knowledge of VA procedures and practices as “strengths” or “weaknesses” in evaluating the vendors’ proposals. Thus, we concluded the technical evaluation process favored awarding the contract to the incumbent, Booz-Allen Hamilton, determined to have VA-specific strengths addressing all technical requirements.

Additional review of Booz-Allen Hamilton’s Consensus Technical Evaluation Document, which Management provided along with its response to this report, further supports our finding that the technical panel placed greater emphasis on VA experience than any other evaluation factors. Following are excerpts from the Consensus Technical Evaluation Document substantiating that the panel awarded seven significant strengths to Booz-Allen Hamilton based on its VA experience:

- “Offeror was able to articulate its plan based on its extensive experience with VA and provided a highly feasible approach...”
- “Offeror has demonstrated incumbency [VA] expertise and has shown detailed experience with developing VA Information Protection and Risk Management Strategic Plan.”
- “Offeror has demonstrated a comprehensive understanding of [VA] Communication Plans and incumbency knowledge of how to communicate to the field.”

- “Offeror demonstrated a comprehensive understanding of the level of effort required to maintain documentation that will ensure VA security and privacy requirements are incorporating into new and existing systems. They have shown this by reviewing, grading, and providing feedback for [VA] security and privacy documentation...”
- “The offeror’s proposal provided extensive details and demonstrated a thorough understanding of the risk assessment problem. Offeror provided examples of success stories at the Internal Revenue Service (IRS) and within VA, where the offeror completed over 320 risk assessments.”
- “The offeror demonstrated a high level of expertise in Rapid Incident Response with its current involvement with the VA Network Security and Operations Center.”
- “Offeror demonstrated a comprehensive understanding of [VA] Outreach Campaigns. They have shown this with its recent experience with creating and managing the Information Security Officer outreach campaign, the 2010 IP Focus awareness campaign, the Privacy Officer Campaign, and several mass email campaigns.”

Because of its knowledge as the incumbent, Booz-Allen’s proposal received more “strengths” based on prior knowledge of VA practices. Management did not address our related finding that “weaknesses” were awarded to the other offerors because of their lack of specific VA knowledge. Further, contrary to Management’s contention, we considered Booz-Allen Hamilton’s experience with VA as well as other Federal agencies in determining how the strengths and weaknesses were assigned. For example, we acknowledged that the technical panel awarded one “significant strength” to Booz-Allen because of its risk assessment experience with both the IRS and VA. Nonetheless, knowledge of VA’s risk assessment practices was the key factor in awarding the “significant strength” in this area. The other proposals received “strengths” for experience at other Federal agencies, such as Health and Human Services and Department of Defense; however, only VA experience warranted “significant strengths.”

- b) We acknowledge Management’s admission of minor error in rating one offeror’s Certification and Accreditation experience. We agree that the error did not affect the overall technical evaluation results or the contract award decision. Rating this offeror’s experience with VA’s Certification and Accreditation process as a “significant strength” concurrent with citing the same experience as a “significant weakness” had a cancelling effect that could not alter the selection decision.
- c) We disagree with Management’s contention that we incorrectly concluded an offeror was penalized for proposing use of certain network monitoring tools while Booz-Allen Hamilton was not penalized for proposing the same tools. According to the Selection Decision Document, one offeror proposed using Sourcefire, Netwitness, and Arcsite, which were not part of VA’s current software inventory and could therefore pose risks to VA. Although Booz-Allen Hamilton included the same network monitoring tools in its proposal, the technical evaluation panel did not identify these tools as potential risks. We also disagree with Management’s assertion that one offeror’s proposal required VA to purchase a specific network monitoring tool, while Booz-Allen Hamilton did not require

VA to purchase any new hardware or software. To illustrate, we noted the offeror wanted to introduce proprietary network monitoring tools “at no cost” if VA used a certain Security Information and Event Management solution; however, the proposal did not require that VA adopt either the specified tools or the proprietary solution.

- d) We disagree with Management’s contention that Booz-Allen Hamilton’s nine significant strengths justified selecting it for contract award despite the fact that it was the highest bidder. As noted in the Source Selection Decision Document, Booz-Allen Hamilton’s cost of approximately \$133 million reflected a premium of 16 percent (\$18 million) and 22 percent (\$24 million) over the two other offerors. VA justified this premium because of the perceived significant strength and low technical risk from Booz-Allen Hamilton’s extensive knowledge, understanding, experience, and expertise in support of VA’s enterprise-wide information security and risk management program. Further, although it would have been helpful to substantiate the selection decision, Management did not provide a labor-rate cost analysis justifying the premium price paid for the contract award. Such an analysis would have compared the labor rates of all proposals and determined whether Booz-Allen Hamilton’s labor rates were reasonable. As such, we stand by our conclusion that VA traded off lower cost in favor of Booz-Allen Hamilton’s technical knowledge of VA practices. While the award decision may have resulted in a low risk to the Government and a decreased learning curve as Management asserted, VA should not have paid a premium price for the incumbent’s knowledge. In our opinion, favoring the incumbent during the selection process did not promote full and open competition in accordance with the Federal Acquisition Regulation. This practice puts VA at risk of awarding future “de-facto” sole source contracts at greater expense to the Government because of reduced competition.
- e) We take issue with Management’s assertion that the Technical Acquisition Center’s source selection was in strict accordance with the solicitation and relevant GAO case law. Management based its assertion on a GAO ruling<sup>1</sup> that “It is common for an incumbent to possess and receive evaluation credit for unique advantages which the government is not required to neutralize, and this advantage does not constitute an unfair competitive advantage or represent preferential treatment by the agency.” We agree that organizational knowledge can be a key consideration in evaluating offers and a deciding factor when multiple bids are indistinguishable. However, this ruling as well as another GAO decision<sup>2</sup> cited by Management further emphasized the importance of disclosing in the RFQ how relative experience will be evaluated during the selection process and when giving credit to the incumbent. As such, VA should have identified such knowledge as a significant evaluation factor in the RFQ before using it as criteria for rating purposes. We maintain that the Department’s failure to disclose knowledge of VA practices as a significant evaluation factor prevented all vendors from submitting comparable proposals to emphasize their specific VA experience, placing potential contractors at a disadvantage in the bidding process.

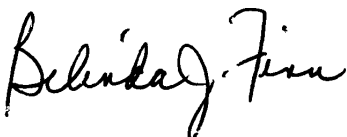
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<sup>1</sup> GAO Decision: *Crofton Diving Corporation*, B-289271, January 30, 2002; [www.gao.gov/products/A02865](http://www.gao.gov/products/A02865).

<sup>2</sup> GAO Decision: *Dr. Carole J. Barry*, B-271248, June 28, 1996; [www.gao.gov/products/476344](http://www.gao.gov/products/476344).



12. In his comments, the Executive Director, Office of Acquisition, Logistics, and Construction, neither concurred nor non-concurred with our recommendations and provided no statement on his intent for future acquisitions. Therefore, we will evaluate VA's contract award decisions in future audits to determine if evaluation panels assess vendor proposals based solely on evaluation factors stated in the solicitations.



BELINDA J. FINN  
Assistant Inspector General  
Office of Audits and Evaluations

## Appendix A Executive Director, Office of Acquisition, Logistics, and Construction Comments

### Department of Veterans Affairs

### Memorandum

**Date:** August 23, 2011

**From:** Executive Director, Office of Acquisition, Logistics, and Construction (001ALC)

**Subj:** Draft Report: Review of Secure VA-Chief Information Security Officer Support Services Acquisition Process (VAIQ 7133724)

**To:** Assistant Inspector General for Audits and Evaluations (52)

1. The Office of Acquisition, Logistics, and Construction (OALC) has reviewed the draft report: Review of Secure VA-Chief Information Security Officer Support Services Acquisition Process (July 2011).

OALC respectfully submits the following general comments and clarifications:

- a. Paragraph 3, notes "By using the knowledge of VA procedures and practices as a significant selection factor without clear disclosure of its relative importance in the RFQ, the technical evaluation process favored awarding the contract to the incumbent, Booz-Allen Hamilton, which has been VA's Information Assurance and Information Technology Security Services contractor for the past two years."

OALC Response: The evaluation reports and the Source Selection Decision Document (SSDD), clearly contradict this statement.

The evaluators' assessment of "strengths" and "weaknesses" contradicts the OIG's determination it raised the level of importance of an offeror's "Knowledge of VA procedures." For example, with respect to Offeror A's (i.e., the incumbent) technical evaluation, the evaluators assessed nine significant strengths.

Seven of those nine significant strengths made limited or no mention of its experience with VA. In those cases where Offeror A's VA experience was mentioned, it was not the main reason underlying the "strength." For example, "Significant Strength" (7) states, "the offeror's proposal provided extensive details and demonstrated a thorough understanding of the RA problem. Offeror provided examples of success stories at IRS and within the VA, where offeror completed over 320 risk assessments over the last two years." (Ref to Attachment 1 – Offeror A Evaluation Reports, pg 2)

While the Agency does reference the offeror's VA "success stories," there is no indication it exaggerated its VA experience or raised the importance of the experience.

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Additionally, where an offeror gave examples of how it used its approach/methodology for other large scale agencies/organizations, the offeror was assessed the very same credit.

b. Paragraph 5, Table 1 - Technical Knowledge Scores by Bidder.

OALC Response: The OIG references the number of Strengths and Weaknesses, and categorizes them as "VA Specific" or not. This is misleading; for example, in numerous instances, an offeror provided an excellent approach/methodology, and part of its proposal referenced the fact it used this approach in support of a large-scale organization/agency. As a result, the strength may reference the offeror's use of the methodology/approach in support of a particular organization/agency (i.e., VA or other agency), but the fact it was used at VA did not drive the strength. In this instance, what drove those strengths, and in certain instances weaknesses, were the proposed approach/methodology and not its work with a particular organization/agency.

The record clearly demonstrates the evaluators did not make VA experience a "key factor" during the evaluation as the evaluation reports make numerous references to an offeror's experience with other non-VA agencies (e.g., IRS, HHS and DoD). In most cases, the reference to VA (or other Federal agencies) only served as further support it applied its methodologies in a similar, verifiable, environment. Such an assessment was wholly reasonable and consistent with VA's evaluation plan and relevant Government Accountability Office (GAO) precedent. The OIG's report does not go beneath the initial "VA" reference (thus the reference to Table 1). Basically, if the word "VA" is mentioned in the strength then it was mistakenly assumed it was the sole basis for the assessment. The OIG ignored the comprehensive and detailed basis for the Strength/Weakness assessments.

c. Paragraph 7, notes "Inconsistencies among the vendor evaluations and supporting justification statements also appeared to promote the award in favor of the incumbent contractor, Booz-Allen Hamilton. For example, VA penalized offeror B for proposing the use of certain network monitoring tools, but did not penalize Booz-Allen Hamilton for suggesting use of the same tools in its proposal. Further, VA rated another offeror's experience with VA's Certification and Accreditation process as a "significant strength," while at the same time citing the experience as a "significant weakness" because the offeror did not provide adequate detail about it in its proposal."

OALC Response: The OIG noted a relatively minor error in the evaluation reports regarding [REDACTED] experience with the Certification and Accreditation (C&A) [REDACTED] showed C&A experience/understanding, but in 2.6.2 it did not show/demonstrate the ability to develop test methodology or training per the task. 5.6.2 of performance work statement (PWS) (offeror 2.6.2). Nevertheless, the

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error was minor and did not impact [REDACTED] overall technical rating or the contract award decision. Moreover, nothing about this error lends any support to the notion an offeror's VA experience was a significant selection factor.

The OIG also states the "VA penalized [REDACTED] for proposing the use of certain network monitoring tools, but did not penalize Booz-Allen Hamilton for suggesting use of the same tools in its proposal." The differences in the two proposals are clear; where [REDACTED] required VA to purchase a specific tool, Booz-Allen Hamilton's proposal did not require VA to purchase any new software/hardware in their solution. Once again, nothing about the determination inflated the importance of VA experience.

- d. Paragraph 8, notes "VA traded-off lower cost in favor of vendors' technical knowledge of VA procedures and practices in evaluating the offers."

OALC Response: The contemporaneous documentation in support of the award decision completely contradicts the IG's determination. The Source Selection Decision Document (SSDD) states: "The benefits of Offeror A's Outstanding rated technical proposal, with nine (9) significant strengths, justifies the 16% and/or 22% price premium over Offeror C and/or Offeror B respectively. The Government is certainly willing to pay the aforementioned premium for an approach which demonstrates extensive knowledge, understanding, experience, and expertise in Security Operations Support, System Initiation Security Implementations, Cyber Security, Privacy Program, and Incident Rapid Response in support of VA enterprise wide information security and risk management program. The significant strength of Offeror A's proposed team skills is impressive and results in low proposal risk to the Government as well as a decrease learning curve. Due to the high value placed on maintaining the confidentiality, integrity, availability, and privacy of Veterans data, it is in the Government's best interest to award to an offeror with a low technical risk. (Refer to Attachment 2 – SSDD, pg 9)

The well-articulated trade-off analysis does not suggest it raised the importance of an offeror's "Knowledge of VA procedures." The contemporaneous documentation irrefutably shows while the Technology Acquisition Center (TAC) considered an offeror's "Knowledge of VA procedures", (IAW the solicitation), it certainly was not, "the deciding factor in the contract award decision" nor was it given more weight than what the GAO has permitted. (Refer to Attachment 3 - *Croffin [Crofton] Diving Corporation*, B-289271, January 30, 2002, and refer to Attachment 4 - *Dr. Carole J. Barry*, B-271248, June 28, 1996).

- e. Paragraph 10, notes "We recommend the Executive Director for Acquisition, Logistics, and Construction ensure that Contracting Officers verify that future Requests for Quotations clearly identify all significant factors for evaluating vendor

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proposals. We further recommend the Executive Director for Acquisition, Logistics, and Construction, in coordination with the Assistant Secretary for Information and Technology, institute management oversight controls to ensure future evaluation panels assess vendor proposals based solely on factors stated in solicitations for information technology products and services."

OALC Response: OALC concludes that the TAC maintains its source selection was in strict accordance with the solicitation and relevant GAO case law. The GAO has established, "It is common for an incumbent to possess and receive evaluation credit for unique advantages which the government is not required to neutralize, and this advantage does not constitute an unfair competitive advantage or represent preferential treatment by the agency" (refer to *Croffin [Crofton] Diving Corporation*, B-289271, January 30, 2002). The GAO further held, "Experience as an incumbent may offer genuine benefits to an agency and may reasonably distinguish the incumbent's proposal (refer to *Dr. Carole J. Barry*, B-271248, June 28, 1996). Here, while the evaluators assessed a small number of "strengths" because of Offeror A's VA experience, nothing in the contemporaneous record suggests that those limited "strengths" drove the Outstanding rating and was the "deciding factor in the contract award decision." While the instant solicitation does state, "The offeror shall address ... Knowledge of VA procedures," nothing in the record indicates the government exaggerated its importance or made it a "significant selection factor." (Refer to Attachment 5 – Sol. pg 74)

The TAC confidently maintains all offerors were properly notified VA knowledge would be considered in the evaluation. The contemporaneous documentation, specifically the SSDD, clearly demonstrates while VA knowledge was appropriately considered during the evaluation, it did not drive the award decision and was not allotted undue evaluation credit. The fact the debriefed offerors decided not to protest (either at the GAO or at the contracting officer level) the award speaks volumes as to the quality of this evaluation and the resultant award decision.

The OIG did not address any of the GAO citations (*Croffin [Crofton] Diving Corporation*, B-289271, January 30, 2002; and *Dr. Carole J. Barry*, B-271248, June 28, 1996) referenced in our initial response to the draft OIG report during a June 7, 2011, teleconference. The OIG also did not consider a number of key facts such as the SSA's rationale for award and the credit assessed for experience with other large scale organizations/agencies.

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2. OALC appreciates the opportunity to comment on your draft report. Should you have questions regarding this submission, please contact Ms. Wendy J. McCutcheon, Executive Director, TAC, 732-578-5402.

*(original signed by:)*

Glenn D. Haggstrom

Attachments\*

*\*Note: The size and confidential nature of the five attachments referenced in the letter provided by the Principal Executive Director for Acquisition, Logistics, and Construction's preclude inclusion in this report. The contractor evaluation materials referenced are largely considered proprietary; the initial solicitation can be obtained through VA's FOIA/Privacy Office. The two GAO rulings are available at the specific Internet addresses provided on page 6 in this report.*

## **Appendix B   OIG Contact and Staff Acknowledgments**

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|-------------|----------------------------------------------------------------------------------------------------------|
| OIG Contact | For more information about this report, please contact the Office of Inspector General at (202) 461-4720 |
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|-----------------|-----------------------------------------------------------|
| Acknowledgments | Michael Bowman, Director<br>Neil Packard<br>George Ibarra |
|-----------------|-----------------------------------------------------------|

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