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Decision

Matter of: SOC LLC

File: B-420806

Date: August 30, 2022

Robert J. Sneckenberg, Esq., Cherie Owen, Esq., James Peyster, Esq., and Amanda H. McDowell, Esq., Crowell & Moring LLP, for the protester.

Gary J. Campbell, Esq., Kelly Doran, Esq., Suzanne Boehm, Esq., and Miles McCann, Esq., Perkins Coie LLP, for Aegis Defense Services, LLC d/b/a GardaWorld Federal Services, the intervenor.

Kathleen D. Martin, Esq., Department of State, for the agency.

Todd C. Culliton, Esq., and Tania Calhoun, Esq., Office of the General Counsel, GAO, participated in the preparation of the decision.

DIGEST

Protest that the agency unreasonably evaluated protester’s technical proposal is denied where the record shows that the evaluation was consistent with the stated evaluation criteria.

DECISION

SOC LLC, of Chantilly, Virginia, protests the issuance of a task order to Aegis Defense Services, LLC d/b/a GardaWorld Federal Services, of McLean, Virginia, under task order request for proposals (TORFP) No. 19AQMM21R0370, issued by the Department of State (DOS) for security services. SOC argues that the agency unreasonably evaluated its proposal, and improperly made the selection decision.

We deny the protest.

BACKGROUND

On December 9, 2021, DOS issued the task order against the DOS Worldwide Protective Services (WPS) III indefinite-delivery, indefinite-quantity (IDIQ) contract for guard, specialized security, and logistical support services at the U.S. Embassy in Baghdad, Iraq. Contracting Officer’s Statement (COS) at 1; Agency Report (AR), Tab 1, TORFP at 1-2; AR, Tab 2, TORFP, Performance Work Statement (PWS) at 3. The

TORFP contemplated the issuance of a task order to be performed over a 1-year base period, nine 1-year option periods, and one 6-month extension period. TORFP at 1-2.

The task order contract would be issued on a best-value tradeoff basis considering technical approach, management strategy, past performance, and price factors. AR, Tab 4, TORFP, Evaluation Criteria at 1. The TORFP advised that the technical and past performance factors were the most important factors, and were equivalent. *Id.* The next most important factor was the management approach factor. *Id.* The least important factor was the price factor. *Id.* at 3.

Both the technical approach and management strategy factors contained subfactors. The technical approach factor contained four subfactors: staffing plan; training management plan; mobilization and transition plan; and, logistics and property management and accountability plan. TORFP, Evaluation Criteria at 2. The management strategy contained three subfactors: management approach; quality control plan; and, key personnel. *Id.*

DOS received four proposals prior to the February 4, 2022, close of the solicitation period. AR, Tab 11, Source Selection Decision Memorandum (SSDM) at 3. The agency's evaluation produced the following relevant results:

	SOC	GardaWorld
Technical Approach	Acceptable	Outstanding
Management Strategy	Marginal	Good
Past Performance	Satisfactory Confidence	Satisfactory Confidence
Price	\$1,259,826,530	\$1,182,295,174

Id. at 10-11. When evaluating SOC's technical approach, the agency identified numerous weaknesses associated with the firm's staffing approach. *Id.* at 13-14. The agency also identified several weaknesses present in the firm's proposed management strategy, primarily involving the firm's proposed key personnel not meeting the position requirements. *Id.* at 15.

When making the best-value tradeoff determination, the agency identified GardaWorld's proposal as offering the best value. AR, Tab 11, SSDM at 21. DOS compared SOC's and GardaWorld's proposals, and noted that GardaWorld's proposal was technically superior and lower-priced. *Id.* at 16. Ultimately, the agency issued a task order contract to GardaWorld in the amount of \$1,182,295,174. *Id.* at 21. After SOC learned that its proposal was unsuccessful, it filed this protest with our Office.¹

¹ Our Office has jurisdiction to review the protest of this task order pursuant to our authority to hear protests related to task and delivery orders placed under civilian agency multiple-award IDIQ contracts valued in excess of \$10 million. 41 U.S.C. § 4106(f)(1)(B).

DISCUSSION

SOC challenges multiple aspects of the agency's evaluation. Generally, SOC argues that the agency unreasonably assigned multiple weaknesses to its technical approach and management strategy, and that the agency improperly made the selection decision. We have reviewed all of the firm's challenges, and conclude that none provide us with a basis to sustain the protest.

We discuss the principal challenges below, but note, at the outset that, 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; rather, we review the record to determine whether the agency's evaluation was reasonable and consistent with the solicitation's evaluation criteria, as well as applicable statutes and regulations. *TeleCommunication Sys., Inc.*, B-419323.2, Jan. 19, 2021, 2021 CPD ¶ 28 at 3. Further, a protester's disagreement with the agency's judgment, without more, does not establish that the evaluation was unreasonable. *Pioneer Corporate Servs., Inc.*, Aug. 31, 2021, B-418678.5, 2021 CPD ¶ 312 at 3.

Technical Approach

SOC asserts that the agency unreasonably assigned multiple weaknesses to its technical approach. The agency responds that it reasonably evaluated the firm's proposal, and that SOC's arguments simply constitute disagreement with the agency's evaluation. Memorandum of Law (MOL) at 10.

By way of background, the TORFP instructed offerors to organize their technical approach proposals by addressing each of the four subfactors and all of the PWS requirements. AR, Tab 3, TORFP, Instructions at 7. Specifically, the TORFP instructed offerors to provide a complete staffing plan, training management plan, mobilization and transition plan, and logistics and property management and accountability plan. *Id.* As part of the evaluation criteria, the TORFP advised that the agency would assess each proposal to determine whether the offeror demonstrated a full understanding of the requirement as outlined in the IDIQ and the PWS. TORFP, Evaluation Criteria at 2. The TORFP also advised that the agency would evaluate the extent to which each proposal demonstrated the ability to perform the requirement. *Id.*

As noted above, DOS evaluated SOC's technical approach as demonstrating an adequate approach and understanding of the requirement, and as a result, DOS assigned an adjectival rating of "acceptable." AR, Tab 10, Tech. Evaluation Report (TER) at 1. The agency identified four weaknesses associated with the firm's staffing plan, one weakness regarding its training management plan, and two weaknesses for its mobilization and transition plan. *Id.* at 2. We discuss the subfactors and the principal allegations in turn.

Staffing Plan

DOS evaluated SOC's staffing plan as containing four weaknesses. AR, Tab 10, TER at 3-5. SOC challenges each of the assigned weaknesses, and we address the challenges successively.

As background, the TORFP instructed each offeror to provide a complete staffing plan in accordance with the task order management plan (TOMP) requirements of the WPS III IDIQ. TORFP, Instructions at 7. The TOMP provided that the selected contractor's staffing plan should describe the methodology for meeting any task order staffing requirements, and specifically address the number of applicants needed to fill each position, how the contractor would ensure staffing requirements are continuously met, the proposed staffing-reserve capacity, and contingency plans. WPS III IDIQ, attach. 9, TOMP requirements at 8.

When evaluating SOC's staffing plan, DOS assigned the first weakness because it determined that the plan failed to forecast correctly the number of third country nationals (TCN) needed to provide senior guard and armed guard services. AR, Tab 10, TER at 3-5. DOS noted that SOC's proposal included both a particular staffing ratio for TCNs, and an accompanying table identifying the number of required personnel and the proposed total staffing. *Id.* DOS then noted that the presented ratio was inconsistent with the specific proposed staffing figure. *Id.* In other words, DOS concluded that SOC proposed a lower number of total staff than what would otherwise be required when applying the proposed ratio. *Id.*

SOC argues that this weakness was unreasonable because it proposed more than the total number of required personnel, and the staffing ratio had a minor clerical error. Protest at 6-7. According to SOC, the agency cannot reasonably penalize SOC for a clerical error because the error did not affect the actual number of personnel proposed. *Id.* at 7. The agency responds that SOC's proposal included erroneous figures that cast doubt on the firm's ability to forecast the number of personnel necessary to perform the requirement. COS at 26-28.

On this record, we have no basis to object to the agency's evaluation. SOC's staffing plan proposed a [DELETED] staffing ratio to meet the requirement. AR, Tab 8, SOC Tech. Proposal at 30-31.² Despite that ratio, SOC's proposal showed that it would provide total staffing figures of [DELETED] senior guards to meet the 92 senior guard requirement, and [DELETED] armed guards to meet the 592 armed guard requirement. Based on these figures, SOC proposed a [DELETED] staffing ratio for both positions. *Id.*; see also Protest at 6 n.5 (computing the intended staffing ratio as [DELETED]). Thus, we agree with the agency that the firm's staffing plan identified a particular ratio as needed to perform the requirement but confusingly provided a lower total number of proposed staff. As a result, we deny the protest allegation because we agree that the

² When referencing the firm's technical proposal, we cite to the Adobe PDF page numbers.

agency could reasonably be concerned with SOC's ability to forecast or provide the number of necessary personnel given the inconsistency in the firm's proposal. See COS at 28.

To the extent SOC asserts that the agency should have ignored the error because it still proposed more than the number of required personnel, we do not find that argument persuasive. The agency explains, and our review confirms, that the PWS specifically required offerors to propose more than the required personnel since the selected contractor must ensure that staffing requirements are continuously met despite attrition, retirement, leave, and other employee absences. WPS III, attach. 9, TOMP requirements at 8; see also COS at 27. Similarly, we do not find persuasive SOC's argument that the agency should have ignored the erroneous ratio as an obvious clerical error because an offeror is required to submit a well-written proposal, and if it fails to do so, it runs the risk that its proposal will be evaluated poorly. See *Interactive Gov't Holdings, Inc.*, B-414071, B-414071.2, Feb. 2, 2017, 2017 CPD ¶ 131 at 6 ("it is an offeror's responsibility to submit a well-written proposal with adequately-detailed information, or risk an unfavorable evaluation").

The second and third weaknesses were assigned to SOC's [DELETED] strategies for [DELETED]--that is, strategies to fill unforeseen vacancies. AR, Tab 10, TER at 4; AR, Tab 8, SOC Tech. Proposal at 33. SOC identified three [DELETED] strategies, [DELETED]. AR, Tab 8, SOC Tech. Proposal at 33. Under [DELETED], SOC would [DELETED]. *Id.* Under [DELETED], SOC would [DELETED]. *Id.* Under [DELETED]. *Id.*

When reviewing the [DELETED] features, the agency concluded that [DELETED] presented a risk of unsuccessful performance, noting [DELETED]. AR, Tab 10, TER at 4. DOS also noted that [DELETED] would increase the agency's costs because it would be responsible for the [DELETED]. *Id.* Regarding [DELETED], DOS concluded that this feature likewise presented a risk of unsuccessful performance because SOC did not unequivocally demonstrate that it would comply with all applicable requirements for [DELETED]. *Id.* at 5.

SOC argues that these weaknesses were unreasonable because [DELETED] and [DELETED] were optional features. Protest at 9; Comments at 7. According to SOC, the agency could still utilize [DELETED], and that approach would also exceed PWS requirements. Protest at 10. In response, the agency argues that the weaknesses were reasonably assigned. MOL at 17

Here, we have no basis to object to the agency's assignment of these two weaknesses. Although the protester argues that the features were optional, we think the agency reasonably could evaluate and assess all of the [DELETED] strategies since each formed part of the firm's staffing plan. AR, Tab 8, SOC Tech. Proposal at 33. Further, the agency points out that if SOC was selected for award, then all three [DELETED] strategies would be incorporated into the initial task order management plan, and that SOC included costs associated with [DELETED] and [DELETED] in its price proposal.

COS at 30. Thus, even though [DELETED] may qualify as an acceptable approach to staff unforeseen vacancies, we do not object to the agency assigning weaknesses to [DELETED] and [DELETED] since those strategies constituted preferred aspects of the firm's staffing plan and would have formed part of the task order management plan. *Id.* Accordingly, we deny the protest allegation.

Finally, the fourth weakness was assigned because SOC proposed a non-compliant TCN rotation schedule. AR, Tab 10, TER at 5. Specifically, DOS noted that the PWS required the selected contractor to use a 180/35-day rotation schedule (*i.e.*, 180 consecutive days of service followed by 35 days of rest and recuperation (R&R)), but that SOC proposed to use a 180/30-day rotation schedule in one part of its proposal. *Id.*

Like its prior challenge, SOC argues that this weakness is unreasonable because it also proposed the correct 180/35-day rotation schedule in another part of its proposal. Protest at 11. According to SOC, the agency is "making a mountain out of a molehill by exaggerating a clerical error." *Id.* at 12. DOS responds that SOC's technical proposal includes the incorrect rotation schedule, and that therefore, the evaluation was reasonable. COS at 33-34.

On this record, we have no basis to object the agency's assignment of this weakness. The IDIQ PWS required 180/35-day rotation schedules. AR, Tab 14, WPS III, IDIQ, Section C, PWS at 14. Despite that requirement, SOC's technical proposed referenced that the firm used a 180/30-day rotation schedule to support TCN retention. AR, Tab 8, SOC Tech. Proposal at 49. Thus, the agency reasonably assigned the weakness because SOC's proposal did not demonstrate absolute understanding or compliance with the requirement. While the reference may constitute a clerical error, SOC bore the burden to submit a well-written proposal demonstrating that it understood and could perform the requirement. *See Consolidated Safety Servs., Inc.*, B-418221, Dec. 30, 2019, 2019 CPD ¶ 433 at 5. Accordingly, we deny the protest allegation.

Training Management Plan

SOC also challenges a weakness the agency assigned to its training management plan. The PWS required the selected contractor to provide various training services (including initial training to local nationals), and the TORFP required each offeror to submit a training management plan in accordance with Section 6 of the WPS III IDIQ TOMP requirements. TORFP, PWS at 11; TORFP, Instructions at 7. Section 6 of the TOMP required the selected contractor to maintain a training management plan addressing several elements, including how the firm would manage contractor-provided training, and place of performance training. WPS III IDIQ, attach. 9, TOMP at 12-13.

Section 6.2 of the TOMP requirements provides that the selected contractor's training management plan must address several components when required to provide pre-deployment training services, including: identification of all required training prior to deployment in-service and recertification; number and type of instructional personnel

required; plan for recruitment, screening, clearance processing, and certification of training staff; and, identification of training facilities. WPS III IDIQ, attach. 9 at 12. Similarly, section 6.3 of the TOMP requirements provides that the selected contractor's training management plan must address several components when required to provide place of performance training, including: identification of all training requirements; identification of primary and back-up training facilities; types and frequency of courses; and, curriculum compliance with WPS training requirements. *Id.*

As noted above, the agency assigned one weakness to SOC's training management plan because the plan did not address all of the contractor-provided training requirements. AR, Tab 10, TER at 6-8. For example, the agency explains that SOC's proposal did not identify any required pre-deployment training, or identify the number and type of instructional personnel. COS at 37.

SOC complains that the agency unreasonably assigned this weakness. Comments at 6. According to SOC, its training management plan simultaneously addressed the contractor-provided training and the place of performance training requirements. *Id.* Thus, SOC argues that DOS unreasonably ignored information in the firm's proposal when assigning the weakness. *Id.* The agency responds that SOC did not expressly address the requirements for contractor-provided training, and that the agency was under no obligation to search through other parts of the firm's proposal for the information. MOL at 26-28.

On this record, we have no basis to object to the agency's evaluation. First, we agree with the agency that SOC was required to address the contractor-provided training components as part of the firm's training management plan because the PWS specifically requires the selected contractor to provide initial training to local nationals. TORFP, PWS at 11; MOL at 28.

Second, our review confirms that SOC's training management plan did not directly address each requirement for contractor-provided training. See AR, Tab 8, SOC Tech. Proposal at 53-68. Indeed, the section titled "Management of Contractor-Provided Training (Place of Performance Training)" discusses how the firm provides exceptional place of performance training and contains subsections corresponding to the components listed under section 6.3, but does not directly address the components listed under section 6.2 of the TOMP requirements. *Id.* at 63-68; see also COS at 36-38. To illustrate, the agency explains, and our review confirms, that the part of SOC's training management plan discussing place of performance training requirements (*i.e.*, firearms requalification, annual refresher, sustainment, in-service supervisor training, and initial orientation courses) does not correspond to the section 6.2 requirement to identify all required pre-deployment training courses. COS at 37.

Additionally, even if the firm intended to discuss the sections 6.2 and 6.3 components simultaneously, the agency explains that most of the components are distinct; therefore, SOC's responses to the section 6.3 components do not cover the section 6.2

components by extension. COS at 38. Finally, to the extent SOC argues that it indirectly discussed the section 6.2 components in other parts of its proposal (e.g., as part of the firm's staffing plan), DOS explains, and we agree, that the agency was under no obligation to infer critical aspects of the firm's training management plan from tangential references, or otherwise excuse SOC's failure to demonstrate affirmatively the merits of its proposal. *Id.* at 36; see *Merrill Aviation & Defense*, B-416837, B-416837.2, Dec. 11, 2018, 2018 CPD ¶ 421 at 4 (agency reasonably assigned a weakness to a firm's technical proposal where the firm did not directly describe one process of its technical approach, and the agency was under no obligation to infer that process from other aspects of the firm's approach); *Raytheon Co.*, B-416578, B-416578.2, Oct. 22, 2018, 2018 CPD ¶ 376 at 12 ("An offeror that does not affirmatively demonstrate the merits of its proposal risks rejection of its proposal or risks that its proposal will be evaluated unfavorably where it fails to do so."). Accordingly, we deny the protest allegation.

Mobilization and Transition Plan

SOC challenges two weaknesses the agency assigned the firm's mobilization and transition plan. In this regard, the TORFP required each offeror to submit a complete mobilization and transition plan in accordance with TOMP requirements. TORFP, Instructions at 3. As relevant here, the transition plan was required to address multiple tasks, including new hire deployment and training execution. WPS III IDIQ, attach. 9, TOMP requirements at 6. Additionally, each offeror was required to provide a demobilization plan. *Id.* at 7.

As stated above, when evaluating SOC's mobilization and transition plan, the agency assigned two weaknesses to the firm's proposal. AR, Tab 10, TER at 9-10. The first weakness was assigned because the agency identified a problematic feature of SOC's transition plan. *Id.* Specifically, the agency noted that SOC planned to schedule incumbent staff for required training when redeploying, or during their R&R periods. *Id.* The agency determined that this feature was problematic because the solicitation prohibits personnel from completing training during R&R periods. *Id.* Additionally, the agency noted that this feature demonstrated poor understanding of the requirement because incumbent personnel are eligible to complete any required training during the 120-day transition period and therefore would not need to complete any training during the R&R period. *Id.* at 10.

SOC argues that DOS unreasonably assigned this weakness because its transition plan proposed to recalibrate rotation schedules in order to accommodate additional training, rather than propose to conduct training during R&R periods. Protest at 19-20. SOC also argues that its proposal did not evidence any failure to recognize that incumbent personnel could complete the training in the 120-day transition period. *Id.* at 20. Instead, SOC asserts that it proposed a detailed plan in accordance with contract requirements. *Id.* The agency responds that it reasonably evaluated SOC's transition plan. MOL at 29-30.

Here, we agree that the agency reasonably evaluated SOC's transition plan. Our review of the firm's proposal confirms that SOC potentially planned to have incumbent personnel complete training during R&R periods in contravention of the TORFP. AR, Tab 8, SOC Tech. Proposal at 79 ("As a contingency, we may send personnel to training during R&R if needed to meet [full operational capacity]."). Although SOC argues that its transition plan proposed to "recalibrate" rotation schedules to ensure that training is not conducted during R&R periods, see Comments at 12, we do not find that argument persuasive; rather, consistent with DOS's position, we note that the firm's proposal did not provide that training would be completed around R&R periods, but instead stated that training would potentially be completed "during" R&R periods. AR, Tab 8, SOC Tech. Proposal at 79. Accordingly, we deny the protest allegation.

The second weakness was assigned because DOS concluded that SOC's demobilization plan lacked details. AR, Tab 10, TER at 10-11. While DOS noted that SOC included additional information in another part of its proposal (*i.e.*, Volume IV), the agency determined that the firm's failure to include this information as part of its technical proposal (*i.e.*, Volume I) was inconsistent with the solicitation's requirements.³ *Id.* at 11.

SOC argues that the weakness was unreasonable because the TORFP permitted offerors to submit detailed aspects of their plans as Volume IV, and did not require them to include all of the information in Volume I. Protest at 21. Additionally, SOC argues that the agency unreasonably ignored the additional detail contained in Volume IV. *Id.* The agency responds that it reasonably assigned this weakness because SOC's proposal did not conform to the solicitation's instructions and requirements.

On this record, we have no basis to object to the agency's assignment of this weakness. First, our review of the solicitation confirms the agency's position that details about the firm's demobilization plan needed to be included in the firm's technical proposal. Indeed, when preparing their technical proposals, the TORFP specifically instructed that "[p]lans with details, in-depth analysis and discussions in support of subfactors in [Volume I] are to be placed in Volume IV. However, each subfactor must be adequately address[ed] in Volume I to meet requirements." TORFP, Instructions at 7. In addition, the TORFP instructed that Volume I will serve as the initial task order management plan, and that evaluators would consider whether offerors fully address PWS requirements as part of that volume. *Id.* Also, the TORFP advised, as part of the evaluation criteria, that the technical proposals must provide the information requested in the solicitation's instructions. TORFP, Evaluation Criteria at 2.

³ The TORFP instructed offerors to submit their proposals in four volumes. TORFP, Instructions at 4. Offerors were to provide their technical and management approaches in Volume I; their referenced past performance in Volume II; price proposals in Volume III; and administrative items (*e.g.*, certifications and acknowledgments of solicitation amendments) and detailed plans supporting the technical subfactors in Volume IV. *Id.* Significantly, Volumes I and III contained 100-page limits. *Id.*

Second, our review confirms that SOC's technical proposal (*i.e.*, Volume I) did not provide any operative information about its demobilization plan, but rather directed the agency to Volume IV for such information. AR, Tab 8, SOC Tech. Proposal at 90 ("SOC developed this demobilization plan, and updates it as directed, to guide and track activities in the event of [task order] termination. Our detailed Demobilization Plan is presented in Volume IV[.]"). Further, the PWS required the selected contractor to develop a demobilization plan for potential task order termination. WPS III IDIQ, attach. 9, TOMP requirements at 7. Thus, we agree that the agency reasonably assigned this weakness because SOC's technical proposal (*i.e.*, Volume I) omitted details required by the solicitation. COS at 45-46. Accordingly, we deny the protest allegation.

Management Strategy

SOC asserts that the agency unreasonably evaluated its management strategy as "marginal." Protest at 22. SOC argues that the agency unreasonably assigned multiple weaknesses due to its proposed key personnel allegedly not meeting requisite qualifications. *Id.* Indeed, SOC argues that the agency either misread the firm's proposal, or failed to credit its key personnel with work experience. *Id.* DOS responds that it reasonably evaluated SOC's proposed key personnel. MOL at 34.

The TORFP instructed each offeror to submit its management strategy proposal in three sections, including: management approach; quality control plan; and, key personnel. TORFP, Instructions at 8. As relevant here, when discussing key personnel, the TORFP instructed each offeror to submit resumes for all proposed key personnel, and that key personnel must meet all position requirements set forth in the WPS III IDIQ. *Id.*

The PWS identified 12 positions as key personnel, including a project manager and guard force commander. TORFP, PWS at 17. Of significance here, the proposed project manager was required to possess a bachelor's degree with eight years of applicable work experience. WPS III IDIQ, attach. 1, Personnel Qualifications at 14. Additionally, the proposed candidate must possess a minimum of seven years planning, evaluating, analyzing, and implementing government-security type programs. *Id.* Also, as relevant here, the proposed guard force commander was required to possess a minimum of ten years of experience as a non-commissioned officer at an enlisted grade of six (E-6) or above, or as an equivalent law enforcement/armed commercial guard force supervisor. *Id.* at 31.

When evaluating SOC's proposal, the agency determined that multiple proposed candidates lacked the requisite qualifications. As an example, the agency noted that the proposed project manager's resume demonstrated 13.5 years of applicable experience, but only 4.77 years planning, evaluating, analyzing, and implementing government-security type programs. AR, Tab 10, TER at 20. As another example, the agency noted that one of the proposed guard force commander's resume did not clearly specify the period of time spent at the E-6 level, and therefore the agency could not verify that the candidate possessed the requisite experience. *Id.* at 22.

SOC contends that the agency unreasonably evaluated its proposed personnel as not demonstrating the requisite qualifications. Protest at 23. We have reviewed all of the challenges, and find that none provides us with a basis to sustain the protest. As illustrative examples, we discuss SOC's challenges regarding its proposed project manager, and one of its proposed guard force commanders.

The protester argues that the proposed project manager's prior experience as a shift leader demonstrated the balance of the relevant experience. Protest at 23. Additionally, SOC argues that the proposed guard force commander's resume plainly demonstrated that he possessed the requisite ten years of supervisory experience where the resume indicated that he had 7 years of experience as an E-6 and 9 years as a commercial guard supervisor. *Id.* at 29-30.

The agency responds that it reasonably evaluated the firm's proposal consistent with the position requirements. MOL at 37-38. Regarding the proposed project manager's experience, the agency explains that the candidate's resume did not demonstrate the requisite seven years of experience planning, evaluating, analyzing, and implementing government-security type programs. *Id.* at 42. As for the proposed guard force commander, the agency explains that the candidate's resume did not specify the actual period of time that the candidate served as an E-6 or above. *Id.* at 46-47.

Here, we have no basis to object to the agency's evaluation that the proposed project manager lacked the requisite experience. Our review shows that the candidate has slightly less than five years of experience serving as either an operations manager or deputy operations manager where he ensured effectiveness of policies, developed policies, and managed security contracts. AR, Tab 8, SOC Tech. Proposal at 137-38. The candidate's remaining experience involves serving as a security or team leader, where the candidate was responsible for managing small security teams, conducting local vulnerability assessments, performing extended driving missions, conducted site visits, and other similar functions. *Id.*

Further, the agency explains that the candidate's shift leader experience does not meet the project manager experience qualification because a shift leader manages and directs protective security operations, while a program manager plans, evaluates, analyzes, and implements an entire government-security program. COS at 50. To the extent that the protester argues that the shift leader experience qualifies the candidate as meeting the experience requirement, we note that such an argument represents nothing more than disagreement with the agency's judgment regarding the applicability of the shift leader experience and does not provide a valid basis for protest. See *Pioneer Corp. Servs., Inc., supra*. Accordingly, we deny the protest allegation.

Similarly, we have no basis to object to the agency's determination that one of the proposed guard force commanders lacked the requisite experience. The candidate's resume includes three sections: one section highlights particular experience, another section provides his qualifications, and the last section identifies job positions with

service dates. AR, Tab 8, SOC Tech. Proposal at 152-53. While the qualifications section describes the candidate as possessing 16 years of combined supervisory guard experience (*i.e.*, seven years as an E-6 and nine years as an armed commercial guard force supervisor), the section detailing job duties does not provide the precise date range for when the candidate served as an E-6. *Id.*

Instead, the job duties section simply describes the candidate as being employed by the U.S. Navy for 26 years. AR, Tab 8, SOC Tech. Proposal at 152-53. Without a specific date range, the agency explains that it could not assess whether the candidate performed qualifying duties for the requisite period of time. COS at 54. Based on the record, we find that the candidate's resume omitted a particular date range showing when he served as an E-6, and therefore, we do not object the evaluation. See TORFP, Instructions at 8 ("Resumes must demonstrate that the individual meets all position requirements specified for the labor position in WPS III IDIQ, Attachment 1.").⁴

Source Selection Decision

Finally, SOC alleges that the agency unreasonably made its source selection decision because the evaluation of the firm's technical approach and management strategy was flawed. Protest at 32. This allegation is derivative of the protester's challenges to the agency's evaluation of its technical proposal. Thus, we dismiss this allegation because derivative allegations do not establish independent bases of protest. *DirectViz Sols., LLC*, B-417565.3, B-417565.4, Oct. 25, 2019, 2019 CPD ¶ 372 at 9.

The protest is denied.

Edda Emmanuelli Perez
General Counsel

⁴ To the extent the protester complains that the evaluation was unreasonable because the agency previously approved its candidates for these roles during performance of the incumbent contract, we do not find that position persuasive. See Comments at 17. An agency's actions during a prior procurement are irrelevant to the legal propriety of actions taken in connection to a subsequent procurement because each procurement stands on its own. See *Emjay Eng'g & Constr. Co., Inc.*, B-243060, June 21, 1991, 91-1 CPD ¶ 590 at 3. Additionally, we note that the agency explains that the incumbent contract was performed under a different IDIQ contract (*i.e.*, WPS II). COS at 54.