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Decision

Matter of: ICF Incorporated, LLC

File: B-422526; B-422526.2

Date: July 18, 2024

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DIGEST

Protest challenging agency's technical evaluation is denied where the agency evaluated the proposals in accordance with the terms of the solicitation.

DECISION

ICF Incorporated, LLC, of Reston, Virginia, protests the issuance of a task order to General Dynamics Information Technology, Inc. (GDIT), of Falls Church, Virginia, under task order request (TOR) No. 47QFCA23R0073, issued by the General Services Administration (GSA) for Assisted Service Shared Information System (ASSIST) modernization and maintenance services. The protester challenges the agency's evaluation and award decision.

We deny the protest.

BACKGROUND

The agency issued the RFP on November 14, 2023, under the GSA Alliant 2 governmentwide acquisition contract vehicle and pursuant to Federal Acquisition

Regulation (FAR) section 16.505 procedures.¹ Agency Report (AR), Tab 7, TOR at 59, 147.² The TOR seeks modernization and maintenance; development, modernization, and enhancement (DM&E); and operations and maintenance capabilities to enable the continued evolution of GSA's ASSIST. Contracting Officer's Statement (COS) at ¶ 1; TOR at 70-71. According to the TOR, the ASSIST system is a GSA-owned business system that delivers a standardized, compliant, integrated, and streamlined experience to GSA service delivery and management of interagency assisted acquisitions. TOR at 70.

The TOR contemplated the issuance of a cost-plus-award-fee task order with cost-reimbursable contract line item numbers for a period of performance of one year, with six 1-year option periods. TOR at 60, 94. Award was to be made on a best-value tradeoff basis to the vendor "whose proposal is the most advantageous to the Government," considering price and the following four non-price factors, in descending order of importance: technical approach, management approach, key personnel and project staffing, and corporate experience. *Id.* at 147, 149. The solicitation provided that all evaluation factors other than price, when combined, are significantly more important than price. *Id.* at 149.

Proposals were to be submitted in four parts: part I (contractor registration and elements of cost submission information), part II (written cost/price proposal), part III (written technical proposal), and part IV (virtual oral technical proposal presentation). *Id.* at 131. The TOR indicated the agency's intent to combine the results of the written submissions and the oral presentation to arrive at a rating for the technical evaluation factors as a whole. *Id.* at 149.

GSA received timely submitted proposals from four offerors, including ICF and GDIT.³ AR, Tab 18, Award Decision Document at 467. After evaluating the proposals, the agency assigned ICF's and GDIT's proposals the following ratings:⁴

¹ Although the procurement at issue here was a task order competition under a multiple-award indefinite-delivery, indefinite-quantity (IDIQ) contract, the agency issued the solicitation as an RFP, rather than as a request for quotations, and refers to the submission of proposals from offerors instead of quotations from vendors. For consistency and ease of reference to the record, we do the same.

² References to the TOR are to the amendment 3 version provided by the agency at Tab 7. All citations to page numbers for the agency report documents are to the Bates numbering furnished by GSA, unless otherwise paginated.

³ The agency also received a part I proposal from one additional offeror that did not ultimately submit proposal parts II-III or participate in an oral presentation. AR, Tab 18, Award Decision Document at 466-467.

⁴ The agency evaluated proposals under the non-price factors other than corporate experience as: excellent, good, acceptable, or not acceptable. AR, Tab 17, Technical
(continued...)

	ICF	GDIT
Overall Technical	Good	Excellent
Technical Approach	Good	Excellent
Management Approach	Good	Excellent
Key Personnel/Project Staffing	Good	Excellent
Corporate Experience	Relevant	Relevant
Total Proposed Price	\$336,045,456	\$309,828,064

Id. at 468, 518. Of relevance to the protest here, ICF’s proposal received two strengths and one weakness under the technical approach factor; one strength under the management approach factor; and two strengths and one weakness under the key personnel/project staffing factor. AR, Tab 17, TEB Consensus Report at 427-428, 430-435.

The contracting officer reviewed the results of the evaluation and determined that GDIT’s proposal represented the best value because it was higher rated under the technical evaluation factors and offered a lower price. AR, Tab 18, Award Decision Document at 519.

On March 26, 2024, the agency notified ICF that its proposal had not been selected for award. AR, Tab 19, Notice of Award. After requesting and receiving a debriefing that concluded on April 11, 2024, ICF filed this protest with our Office.⁵ AR, Tab 22, Oral Feedback Meeting; Tab 23, Follow-up Questions; COS ¶¶ 16.

DISCUSSION

ICF, the incumbent contractor for the instant requirement, challenges the agency’s evaluation of its technical proposal and the agency’s award decision. In particular, the protester maintains that GSA unreasonably assigned weaknesses to its proposal under the technical approach factor and key personnel/project staffing factor. ICF also claims that the agency failed to assign strengths to its proposal under the technical approach, management approach, and key personnel/project staffing factors. For the reasons discussed below, we find none of the protester’s arguments provide a basis to sustain the protest.⁶

Evaluation Board (TEB) Consensus Report at 410-411. Corporate experience was rated as: relevant or not relevant. *Id.* at 412; TOR at 151.

⁵ The value of the task order at issue here exceeds \$10 million; accordingly, this protest is within our jurisdiction to hear protests of task orders placed under civilian agency IDIQ contracts valued in excess of \$ 10 million. 41 U.S.C. § 4106(f)(2); AR, Tab 19, Notice of Award at 1.

⁶ Although we do not address all of the protester’s arguments in this decision, we have considered all of them, and find no basis to sustain the protest.

The evaluation of proposals in a task order competition, including the determination of the relative merits of proposals, is primarily a matter within the contracting agency's discretion, because the agency is responsible for defining its needs and the best method of accommodating them. *Computer World Servs. Corp.*, B-420777.2, B-420777.3, Feb. 7, 2023, 2023 CPD ¶ 37 at 6. Determinations regarding the magnitude and significance of evaluated strengths and weaknesses are also matters largely within the agency's discretion, and a protester's disagreement with the agency's judgment, without more, does not establish a basis to sustain a protest. *Emagine IT, Inc.*, B-420202, B-420202.2, Dec. 30, 2021, 2022 CPD ¶ 20 at 8.

Evaluation of Weaknesses

ICF challenges the weakness assigned to its proposal under the technical approach factor and the weakness assigned to its proposal under the key personnel/project staffing factor.

Technical Approach

The solicitation provided that offerors' technical proposals were required to describe their technical approach, methodology, and analytical techniques for meeting this requirement. TOR at 144. The solicitation also informed offerors that "the Government is seeking a coherent discussion of how the offeror proposes to meet its requirements, rather than a mere restatement of the requirements or a mere listing of what it proposes to do" and that "[t]he latter will not be deemed to constitute a methodology." *Id.* at 149.

The protester disputes the weakness assigned to its proposal under the technical approach factor, which was for lack of detail in ICF's approach to supporting complex evolving business needs and agility, specifically the ASSIST help function. AR, Tab 17, TEB Consensus Report at 428. ICF argues that GSA's evaluation was unreasonable because the agency overlooked information that was included in its proposal and ignored GSA's "own process for the implementation of new features and services." Protest at 34. The agency asserts that its assessment of the weakness was reasonable because ICF's proposal was too general and lacked specific detail. As discussed below, we find no merit to the protester's arguments.

As explained above, the agency assigned ICF's proposal a weakness for lacking detail on how it would modernize the ASSIST help function, as required by task 2, DM&E Services, subtask 4, supporting complex evolving business needs. AR, Tab 17, TEB Consensus Report at 428. Relevant here, subtask 4 requires that the contractor modernize the help function "to offer convenient access to help documentation" such as "Contextual Help feature, Within-App Tooltips, New Feature Tutorial, New User Onboarding Tutorial and Bot automation for 'How To' help requests."⁷ TOR at 83. It

⁷ The support evolving business needs subtask includes seven activities that the contractor shall perform, one of which is modernization of the ASSIST help function. TOR at 83.

also requires the contractor to “enhance the Help function such that the user is able to find the relevant help documentation in a timely and efficient manner.” *Id.*

ICF’s proposal addressed subtask 4 (support evolving business needs and agility) and its required activities on slides 33 and 34. AR, Tab 11, Technical Proposal Presentation Slides at 341-342. Slide 33 states that ICF’s approach to the ASSIST help function activity is: “[DELETED].” *Id.* at 341.

In evaluating ICF’s proposal, the TEB noted that, although “ICF’s approach to supporting complex evolving business needs and agility with ASSIST identified using [DELETED],” the proposed approach provided insufficient detail on how it will actually modernize the ASSIST help function. AR, Tab 17, TEB Consensus Report at 428 (noting the lack of detail regarding implementation of Contextual help and risks this poses to the program). The TEB found that this failure “could negatively impact the timeliness of the ASSIST Help Function implementation” and was a weakness. *Id.*; AR, Tab 13, TEB Evaluation Workbook at Factor 1.

The protester disagrees with the agency’s assessment of this weakness and contends that its proposal did in fact “identify those services ICF anticipated using in the development of these features.” Protest at 34. In support of this argument, ICF points to slide 42 of its proposal, which it asserts, contains the detail required. *Id.* at 34-35. In particular, the protester states that on slide 42, “ICF noted the state of relevant technologies useful to ASSIST and their lifecycle maturity according to the FAS IT [information technology] Playbook, October 2023.” *Id.* (citing AR, Tab 11, Technical Proposal Presentation Slides at 350). For example, slide 42 provided the following “implementation approach:”

The Cloud Solution Architect leads the creation of a [DELETED]. First, we assess ASSIST technologies in areas such as [DELETED]. Then, we document [DELETED] and present to GSA IT for prioritization. We then collaborate with FCS for MCaaS [multi-tenant container-as-a-service] adoption [in accordance with] the prioritized list. Once the technology is reviewed, approved, and implemented in FCS, we adopt this technology.

AR, Tab 11, Technical Proposal Presentation Slides, Slide 42 at 350.

The protester asserts that “[r]ather than failing to describe its approach, ICF’s proposal clearly outlines both the process and the anticipated services it planned to utilize to implement new features that the evaluators identified as beneficial.” Protest at 35.

In response, the agency points out that slide 42 of ICF’s proposal “discusses using Cloud-Native Solutions in the overall modernization of the ASSIST system.” Memorandum of Law (MOL) at 21 (citing AR, Tab 11, Technical Proposal Presentation Slides at 350). The agency explains that slide 42 “addresses ICF’s approach to Subtask 8, which is a completely separate technical requirement than the ASSIST Help Function activity in Subtask 4.” *Id.* at 21; *Compare* TOR at 83, *with id.* at 86. In this regard, the agency notes that “Subtask 8 addresses leveraging Cloud-Native Solutions

within the ASSIST system, not specifically the ASSIST Help Function.” *Id.* The agency further asserts that “slide 42 of ICF’s proposal provides no detail about how ICF will meet the requirement to modernize the ASSIST Help Function” and that “[a] general statement that ICF will utilize cloud-based technologies in the overarching ASSIST system does not sufficiently outline ICF’s specific process and approach to modernizing the ASSIST Help Function.” *Id.*

Based on our review, we find nothing unreasonable regarding the agency’s evaluation of the weakness. As discussed above, the TEB concluded that ICF’s approach to supporting complex evolving business needs and agility with ASSIST failed to provide sufficient detail on how ICF will modernize the ASSIST help function, as required by the solicitation. AR, Tab 17, TEB Consensus Report at 428. Although ICF argues that slide 42 of its proposal provided information relevant to subtask 4, Protest at 34, as noted above, the record reflects that Slide 42 of ICF’s proposal does not relate to subtask 4 or subtask 4’s requirement to modernize the help function. AR, Tab 11, Technical Proposal Presentation Slides at 350. Rather, slide 42 is in response to subtask 8, which concerns how ICF would use a cloud-native solutions implementation plan to improve technologies used in the ASSIST system. *Id.* To the extent there was information associated with the help function in this subtask, it is not apparent from ICF’s proposal or the protester’s submissions to our Office in connection with this protest, how the cited provisions in the proposal address the agency’s specific concern regarding how ICF will modernize the ASSIST help function.

ICF also alleges that the assessment of the weakness is unreasonable because it ignores “GSA’s own process for the implementation of new features and services,” Protest at 34, which the protester asserts involves “working with GSA to implement services with the FAS IT Playbook rather than proceeding unilaterally.” Comments & Supp. Protest at 25. In addition, the protester claims that slide 42 of its proposal describes ICF’s proposed approach based on GSA’s own process. As noted above, however, it is not apparent from ICF’s proposal or the protester’s submissions to our Office in connection with this protest, how the cited provisions in the proposal address the agency’s specific concern regarding how ICF will modernize the ASSIST help function. To the extent ICF was intending to rely on GSA’s own process as part of its proposed approach, it was incumbent upon the protester to adequately explain this approach in its proposal. As our Office has recognized, vendors are responsible for submitting well-written proposals with adequately detailed information that allows for a meaningful review by the procuring agency. *Riva Solutions, Inc.*, B-417858.2, B-417858.10, Oct. 29, 2020, 2020 CPD ¶ 358 at 8. Here, the protester failed to do so.

Ultimately, the record reflects that the TEB evaluated ICF’s proposal and found that ICF’s proposal failed to provide sufficient detail on how it will modernize the ASSIST help function, and that this failure poses risk to the program, which could negatively impact the timeliness of the ASSIST help function implementation. AR, Tab 17, TEB Consensus Report at 428 (noting the lack of detail regarding implementation of Contextual help and risks this poses to the program). The protester’s disagreement with the agency’s evaluation does not demonstrate that the evaluation was

unreasonable or otherwise provide a basis to sustain the protest. Accordingly, this protest ground is denied.

Key Personnel/Project Staffing

The protester challenges the agency's assignment of a weakness to its proposal under the key personnel/project staffing factor. The weakness was for ICF's failure to include a defined retention plan. AR, Tab 17, TEB Consensus Report at 435. The protester argues that the agency's assignment of the weakness was unreasonable because the agency ignored information in ICF's proposal.⁸ As discussed below, we find no merit to the protester's argument.

Under this factor, the TOR required offerors to address, in their project staffing strategy, their approach to provide adequate staffing and skill sets and to "[d]escribe the methodology for maintaining the technical expertise of personnel." TOR at 145. The TOR informed offerors that their project staffing approach would be evaluated to assess the degree to which it reflects "[a] relevant, comprehensive, efficient, and feasible methodology for hiring, retaining, and replacing appropriately qualified personnel throughout the life of this [task order]." *Id.* at 151. In addition, the agency confirmed in questions and answers incorporated into the solicitation, that an offeror's "methodology for hiring, retaining and replacing" staff should be included in its "methodology for maintaining the technical expertise of personnel." AR, Tab 4, TOR Questions & Answers at 44.

In evaluating ICF's proposal, the TEB assessed a weakness because ICF's proposal included virtually no information about its methods for hiring, retaining and replacing staff. AR, Tab 17, TEB Consensus Report at 431 (noting the proposal "was mostly silent to this topic, with the exception of two sentences [on slide 89 of ICF's proposal], which stated 'Apply ICF benefits from the [DELETED], and other avenues to [DELETED].'"); *id.* at 435 (emphasizing the proposal "lacked any references to a defined retention plan, which increased risk of unsuccessful performance if replacement was necessary during the [task order]" and finding that "[a]bsence of a plan to backfill qualified personnel would impact the ability to fulfill the tasks specified in the TOR, potentially causing challenges in meeting TOR requirements").

The protester disagrees with the agency's evaluation of this weakness and contends that its proposal included an "extensive discussion of its staffing process," which the protester asserts "inherently included its 'comprehensive, efficient, and feasible methodology' for the recruitment and retention of staff." Protest at 67. In support of this

⁸ Initially, ICF also argued that the weakness was unreasonable because it was based on an unstated evaluation criterion. Protest at 58. Although the agency substantively addressed this argument in its agency report, the protester failed to substantively reply to the agency's response. As such, we view this argument as abandoned. 4 C.F.R. § 21.3(i)(3); see *SPATHE Sys. LLC*, B-420463.2, June 13, 2022, 2022 CPD ¶ 146 at 8 n.12.

argument, ICF cites from sections of its proposal, which it asserts, contain the required detail. Protest at 67-69; Comments & Supp. Protest at 26. For example, ICF points to slide 89 of its proposal, which in the protester's view, provides "a detailed five-step methodology in which it continuously identifies gaps and skill needs, hires new personnel and trains existing personnel." Comments & Supp. Protest at 26.

In response, the agency asserts that the TEB looked at the referenced portions of ICF's proposal and found them lacking. MOL at 80. In this regard, the agency notes that the TEB explained that ICF's proposal included only two sentences regarding this aspect, both on Slide 89 of its proposal. AR, Tab 17, Consensus Evaluation at 431; AR Tab 11, Technical Proposal Presentation Slides at 397 (Slide 89). The agency maintains that "[a]lthough Slide 89 includes a headline stating, 'Reskilling, Hiring, and Mentoring,' it lists only general statements of ICF's intent to provide benefits to existing staff and to achieve hands-on knowledge transfer." MOL at 80 (quoting AR, Tab 11, Technical Proposal Presentation Slides at 397 (Slide 89)).

We find nothing unreasonable regarding the agency's assessment of the weakness. Although the protester asserts that ICF's proposal "clearly detailed its methodology" of "how it will retrain and replace staff," Comments & Supp. Protest at 26, it is not apparent from ICF's proposal or the protester's submissions to our Office in connection with this protest, how the cited provisions in the proposal address the agency's specific concern that ICF's proposal lacked a "relevant, comprehensive, efficient, and feasible methodology for hiring, retaining, and replacing appropriately qualified personnel through the life of this [task order]," as required by the solicitation. AR, Tab 17, TEB Consensus Report at 408; TOR at 151. Ultimately, the record reflects that the TEB evaluated ICF's proposal, including the quoted sections, and found that ICF's proposal failed to provide information and details specific to a defined retention plan, and instead used general statements of ICF's intent to provide benefits to existing staff and to achieve hands-on knowledge transfer. AR, Tab 17, TEB Consensus Report at 431. To the extent ICF contends that its proposal was adequate or should have been evaluated differently, the protester's disagreement with the agency's evaluation provides no basis to sustain the protest.

Evaluation of Strengths

ICF argues that its proposal should have been assigned additional strengths under the first three technical factors. Specifically, in its supplemental protest, ICF asserts that under the technical approach factor, its proposal should have been credited with additional strengths for the following aspects of its proposal: (1) its use of artificial intelligence (AI) technologies, (2) its approach to implementing improvements such as [DELETED], (3) its product team alignment, and (4) its proposal addition of 31 service level agreements (SLAs). Comments & Supp. Protest at 10. Under the management approach factor, ICF argues that its proposal should have been credited with additional strengths under each of the four aspects identified in the TOR for evaluation of an

offeror's management approach.⁹ *Id.* at 11-12; TOR at 149. With regard to the key personnel/project staffing factor, ICF contends that its proposal should have been credited with additional strengths relating to ICF's key personnel and project staffing plan. Comments & Supp. Protest at 16-17.

Before addressing these alleged strengths, we note that in its initial protest, ICF argued that its proposal warranted 14 additional strengths under factor 1, technical approach; five additional strengths under factor 2, management approach; and five additional strengths under factor 3, key personnel/project staffing. Protest at 34-35, 47-48, 59-60. In its agency report, GSA substantively responded to each of ICF's allegations in detail; in its comments on the agency report, ICF did not substantively reply to the agency's response. As such, we view these arguments as abandoned. 4 C.F.R. § 21.3(i)(3) ("GAO will dismiss any protest allegation or argument where the agency's report responds to the allegation or argument, but the protester's comments fail to address that response."); see *IPKeys Techs., LLC*, B-416873.2, B-416873.3, Apr. 5, 2019, 2019 CPD ¶ 138 (finding abandonment of 16 alleged missed strengths; initial protest alleged agency failed to assign 19 separate strengths, but protester's comments rebutted only three of the agency's arguments); *By Light Prof'l IT Servs., LLC*, B-417191.3, Dec. 4, 2019, 2019 CPD ¶ 416 at 3 n.4 (protester's comments substantively responded to five out of 17 missed strength allegations; the remaining 12 were deemed abandoned); *Tridentis LLC*, B-417096 *et al.*, Feb. 11, 2019, 2019 CPD ¶ 91 (five out of 11 missed strengths deemed abandoned).

In place of the abandoned arguments, ICF raises new allegations concerning various alleged strengths under the technical factors, as noted above. The protester, however, failed to clearly map the arguments in its comments to those in the initial protest. For example, under the technical approach factor, ICF's initial protest set out 14 purportedly missed strengths, but its comments name only four. These four items, however, do not neatly align with the missed strengths claimed in ICF's initial protest. Compare Comments & Supp. Protest at 10, *with* Protest at 35-46. As the agency points out, while there may be some conceptual overlap between the "new" strengths at issue and the original alleged missed strengths, ICF fails to coherently explain how the "new" missed strengths derive from the original missed strengths. Supp. MOL at 21 n.6. Although we

⁹ These aspects include the following: (1) a sound approach to identifying and applying resources to accomplish the requirements in an appropriate, innovative, and efficient manner; (2) the degree of effectiveness, relevancy, and practicality of the offeror's innovative methodology to ensure clear lines of authority and communication within the offeror's team (including organizational structure) and between the offeror's team and the government, for timely problem identification, mitigation, and resolution; (3) the degree of relevance, comprehensiveness, feasibility, and efficiency of the offeror's risk management methodology during the task order, and the planned actions to mitigate or eliminate risks; and (4) the relevancy and comprehensiveness of the offeror's innovative approach/ability to react to client's requirements and the dynamics of a rapidly changing world and mission environment through dedicated resources, quick responses, and flexibility. Comments & Supp. Protest at 11-12; TOR at 163.

deem the initial arguments regarding the strengths as abandoned, to the extent the old strengths are in any way encompassed in the “new” strengths at issue, they will be considered by our Office.

Relevant to the strengths alleged by ICF in its supplemental protest, the agency report provided in response to the protest included the technical evaluators’ workbook with the evaluators’ individual notes. AR, Tab 13, TEB Evaluation Workbook. ICF’s supplemental allegations largely center around individual notes made by the TEB evaluators that were not captured in the TEB’s final consensus report. In particular, the protester argues that the agency failed to recognize strengths identified by the individual evaluators and that the record fails to explain why these aspects were not considered strengths in the TEB consensus report. The agency responds that it assessed strengths in accordance with the solicitation’s evaluation criteria and that it is not unusual for individual evaluator ratings to differ from one another or from the consensus ratings eventually assigned. Supp. MOL at 5. The agency argues that, in fact, the reconciling of such differences among evaluators’ viewpoints is the ultimate purpose of a consensus evaluation. *Id.*

In response, the protester asserts that the individual “evaluators’ descriptions of strengths . . . clearly meet the definition of strength in the [t]echnical [e]valuation [p]lan,” and thus that GSA should have explained why the individually assessed strengths were no longer considered as such in the TEB Consensus Report. Supp. Comments at 13. The protester maintains that “[u]nder these circumstances, the agency was required to provide further explanation.” *Id.*

In support of its position, ICF cites *Systems Research & Applications Corp.; Booz Allen Hamilton, Inc.*, for the proposition that GAO will sustain a protest where an agency fails to explain why the strengths documented by individual evaluators were not accepted in the consensus evaluation report. Comments & Supp. Protest at 6 (*citing Systems Research & Applications Corp.; Booz Allen Hamilton, Inc.*, B-299818 *et al.*, Sept. 6, 2007, 2008 CPD ¶ 28.). GAO, however, subsequently clarified that its decision in *Systems Research* does “not stand for the proposition that an evaluation record is inadequately documented if it does not provide an explanation for all discrepancies between the findings of the individual evaluators and the consensus findings reflected in the team evaluation report.”¹⁰ *Booz Allen Hamilton, Inc.*, B-409355, B-409355.2, Mar. 19, 2014, 2014 CPD ¶ 100 at 8-9 n.5. We have noted that, to the contrary, “[i]t is not unusual for individual evaluator ratings to differ significantly from one another, or

¹⁰ In any event, *Systems Research* is distinguishable. There, the consensus evaluation documents did not reflect a qualitative assessment of the relative merits of the proposals, and the consensus report and subsequent hearing testimony suggested that the agency evaluated offerors in a manner contrary to the solicitation. By contrast, the record here shows that the TEB conducted a substantive qualitative assessment of proposals in accordance with the terms of the TOR. AR, Tab 17, TEB Consensus Report at 425-436; Tab 18, Award Decision Document at 518-519.

from the consensus ratings eventually assigned; indeed, the reconciling of such differences among evaluators' viewpoints is the ultimate purpose of a consensus evaluation." *Management Sys. Int'l, Inc.*, B-409415, B-409415.2, Apr. 2, 2014, 2014 CPD ¶ 117 at 6-7 (denying protest where "alleged inconsistencies . . . amount to nothing more than quibbling with the minutia of the agency's scoring of proposals"). Indeed, we have consistently emphasized that our "overriding concern" is whether the final ratings are reasonable and consistent with the evaluation criteria, and reasonably reflect the relative merits of proposals--not whether they are consistent with previous individual ratings. *E.g.*, *Computer World Servs. Corp.*, *supra* at 4 n.5 (denying protest alleging inconsistencies between individual and final ratings); *Jacobs Tech., Inc.*, B-413389, B-413389.2, Oct. 18, 2016, 2016 CPD ¶ 312 at 17 (denying protest that agency unequally reconciled individual evaluator findings in favor of awardee).

In response, the agency notes that ICF's argument--that based on the individual evaluators' notes, the agency "viewed ICF's proposal as excellent but unreasonably and systemically failed to credit it for its many strengths"--is "selective and unbalanced." Supp. MOL at 6 (quoting Comments & Supp. Protest at 4). In this regard, the agency explains that "ICF focuses only on alleged 'missing strengths' and makes no attempt to account for duplicative strengths or 'lost weaknesses' also identified by the individual evaluators that were not in the final evaluation consensus report." *Id.*

Based on the record, we find nothing unreasonable regarding the agency's evaluation. The record reflects a routine reconciliation of individual evaluator findings into a final consensus report. As detailed in the TEB chairperson's declaration, GSA convened a team of evaluators comprised of two subject matter experts from GSA IT and three business representatives from the Assisted Acquisition Services Project Management Office to assess proposals. Supp. MOL, TEB Chair Decl. ¶¶ 3-4. The TEB evaluators first conducted individual assessments of ICF's written proposal and oral presentation slides. *Id.* ¶ 6. Then, following an oral presentation in which the evaluators asked ICF clarifying questions, the TEB convened to discuss consensus ratings including "specific strengths and weaknesses." *Id.* at ¶¶ 7-10. Apparently, the business representatives had a "somewhat more positive" impression of ICF's technical proposal, but the subject matter experts concluded that ICF's proposal was merely adequate and could have conveyed "a more thorough understanding of the requirements and modernization efforts." *Id.* ¶¶ 14-15. Ultimately, the TEB members reached consensus that ICF's proposal merited ratings of good across the board. *Id.* ¶ 17; AR, Tab 14, TEB Consensus Ratings. This determination was memorialized in the consensus report, which was reviewed and signed by all voting members. Supp. MOL; TEB Chair Decl. ¶ 19; AR, Tab 17, TEB Consensus Report at 463.

While ICF points to observations made by individual evaluators, as the agency explains and the record reflects, these observations are "simply unreconciled first impressions of the proposal." Supp. MOL at 20. Furthermore, although the contemporaneous record itself does not explain why some strengths or weaknesses were included in the final consensus report while others were not, the record shows that GSA's evaluators engaged in an ordinary evaluation process in which individual evaluation findings were reconciled into a final consensus report. As our Office has previously explained, "[t]here

is no obligation for an agency to document why the consensus rating differs from individual ratings because an agency commonly relies upon multiple evaluators who often perform individual assessments before the evaluation team reaches consensus as to the evaluation finding, and thus, it is not uncommon for the final group evaluation to differ from individual evaluator findings.” *Computer World Servs. Corp.*, *supra*, at 4 n.5; *see also SRA Int’l Inc.*, B-407709.5, B-407709.6, Dec. 3, 2013, 2013 CPD ¶ 281 at 11 (there is no requirement that “every individual evaluator’s scoring sheet track the final evaluation report, or that the evaluation record document the various changes in evaluators’ viewpoints.”); *Jacobs Tech. Inc.*, *supra* at 17 (“The agency’s final evaluation need not explain why it changed or didn’t change from individual evaluator ratings, but rather, that it was reasonable and consistent with the solicitation’s stated evaluation criteria and adequately documented”). Ultimately, the record demonstrates that each of the aspects of ICF’s proposal concerning the alleged missing strengths was reasonably considered in the evaluation of ICF’s proposal. This protest ground is denied.

In addition, based on one isolated note in the evaluators’ workbook notes, the protester contends that the agency changed the definition of a strength after conducting the evaluations. Comments & Supp. Protest at 5-7. Specifically, this note stated:

A strength should be a SLA/KPI [key performance indicator] that we didn’t already ask for in the TOR, for example - committing to quarterly training for clients/contractors. Value add SLAs. Similar to technical approach, offeror did not go above and beyond in this factor - the approach does not necessarily show any weaknesses, but there aren’t any strong points where they give more than what’s required in the TOR to be a strength (AI, business processes). There is more of an [abundance] of observations of meeting requirements and following a status quo.

AR, Tab 13, TEB Evaluation Workbook, Factor 2, line 4. The agency responds that this informal note is “not actually inconsistent with the [technical evaluation plan] definitions,” which defined a strength as “a significant, outstanding, or exceptional aspect of an offeror’s proposal that can be beneficial to the program or increases the probability of successful Task Order performance.” Supp. MOL at 8; AR, Tab 8, Technical Evaluation Plan at 158. The agency maintains that although this definition does not expressly require that an aspect must exceed the solicitation requirements, the words “significant, outstanding, or exceptional” are commonly understood to mean something that is “above and beyond” or “better than normal.” Supp. Comments at 8. Further, the agency notes that the definitions of both the “excellent” and “good” adjectival ratings require consideration of whether the proposal “exceeds” solicitation requirements. AR, Tab 8, Technical Evaluation Plan at 159. In this regard, the agency maintains that when read as a whole, the evaluation criteria clearly contemplate that evaluators will consider whether and to what degree aspects of the proposal exceeded the requirements of the solicitation. Supp. Comments at 8. We agree with the agency and see nothing inconsistent between the individual evaluator’s note and the definition of strength in the technical evaluation plan, nor any indication in the record that the agency failed to adhere to the definition of strength. As such, this protest ground provides no basis to sustain the protest.

Best-Value Determination

Finally, ICF argues that because the underlying evaluation was flawed, the agency's best-value determination was unreasonable. This allegation is derivative of the protester's challenges to the agency's evaluation, all of which we have denied as set forth above. Thus, we dismiss this allegation because derivative allegations do not establish an independent basis of protest. *Advanced Alliant Solutions Team, LLC*, B-417334, Apr. 10, 2019, 2019 CPD ¶ 144 at 6.

The protest is denied.

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