

**DETERMINATIONS AND FINDINGS
FOR
A SOLE SOURCE PROCUREMENT**

CAPTION: Reserved Parking Spaces
PROGRAM AGENCY: Office of the Attorney General
Child Support Services Division
PROPOSED CONTRACTOR: U Street Parking

1. Authorization:

D.C. Official Code §2-354.04; 27 DCMR 1304, 1700, and 1701

2. MINIMUM NEED:

The Office of the Attorney General Child Support Services Division of the District of Columbia (OAG/CSSD) has a need to continue procuring parking at the garage owned by U Street Parking, located at 441 4th Street, NW, Washington, DC 20001.

3. ESTIMATED REASONABLE PRICE:

The estimated reasonable price to procure six (6) reserved parking spaces is \$1,800.00 per month (\$300.00 per vehicle) which equals \$21,600.00 for the entire fiscal year.

4. FACTS WHICH JUSTIFY THE PROCUREMENT:

OAG/CSSD is the entity within the District of Columbia government that administers the District's federally funded child support program. A child support program is referred to as a "IV-D" program because federal child support regulations are referenced in Sec. IV Part D of the Social Security Act (42 U.S.C. § 601 et seq.). Child support programs are administered by the Department of Health and Human Services, Administration of Children and Families, Office of Child Support Enforcement (OCSE). As a requirement to receive federal funding, every child support agency in the country must meet OCSE mandated performance measures. There are five (5) performance measures OCSE measures annually based on the caseload of each IV-D program: paternity establishment, percentage of cases under order, current collections, arrearage collections, and cost effectiveness. Successful service of process, which involves the delivery of writs, summons, and notices of hearings to persons being compelled to appear for a legal proceeding, plays a major role in the agency's ability to meet these performance measures.

OAG/CSSD is presently in possession of six (6) government issued vehicles which OAG/CSSD's staff utilizes on a daily basis to execute OAG/CSSD's responsibilities. These vehicles are primarily used by OAG/CSSD's investigators to perform service of process. For the past several years, these vehicles have been housed in reserved parking spaces in the garage at 441 4th Street, NW, Washington, DC 20001, which is the location of OAG/CSSD's office. Prior to parking the vehicles at this location, they were parked overnight at St Elizabeth's in Southeast DC, which meant that OAG/CSSD's investigators had to retrieve their vehicles in the mornings before reporting to OAG/CSSD's office to sign in and get assignments, and then return them to this location at the end of their shifts each day. This process proved to be very cumbersome and counterproductive to the operations and efficiency of OAG/CSSD's Locate Unit for the reasons set forth below.

First, investigators constantly complained about the parking situation around the building where OAG/CSSD's office is located. Like most District employees, the investigators are expected to work during core business hours, and they are required to report to the office in the mornings before serving their notices. The investigators only spend approximately 30 minutes in the office before leaving to serve notices, but when the vehicles were housed offsite, they typically spent long periods of time trying to find parking. We found that this was hindering their progress by decreasing the amount of time that they actually spent performing their core function of serving people. This also impeded their ability to return to the office during the day when the need arose.

Second, some of the investigators were abusing their use of the vehicles by failing to adhere to the policy and returning their vehicles to St. Elizabeth's at the end of their shifts. The government issued vehicles are to be used by the investigators solely for work related matters. The vehicles are not to be housed overnight at personal residences or driven during hours when the investigators are not performing their child support related responsibilities. In the event of investigators' absences from work due to scheduled leave or unexpected occurrences, their vehicles have to be accessible to other investigative staff to ensure that OAG/CSSD's operations are not hindered due to their absences.

Since OAG/CSSD started to utilize the garage in its building to park its vehicles, the Locate Unit manager has been able to more closely monitor the improper use of vehicles and to ensure that OAG/CSSD's operations are not negatively impacted by the lack of readily available vehicles during emergencies or unforeseen absences. This parking arrangement has also improved workers' efficiency and productivity, as they have been able to spend more time focusing on locating intended recipients and serving them, and thereby assisting OAG/CSSD to establish more paternities and to establish and enforce more support orders. Such increases in paternity and support order establishments have enabled OAG/CSSD to avoid significant penalties which OAG/CSSD incurred in the past, as well as to receive much needed incentive dollars from the federal government.

5. CERTIFICATION BY AGENCY HEAD:

I hereby certify that the findings set forth above are true, correct, and complete to the best of my knowledge and that the proposed contract extension is in the best interest of the District of Columbia.

Karl A. Racine
Attorney General
Office of the Attorney General for the District of Columbia

Date

6. CERTIFICATION BY CONTRACTING OFFICER:

I have reviewed the above findings and certify that they are sufficient to justify the use of the sole source method of procurement under the cited authority. I certify that the notice of intent to award a sole source contract was published in accordance with 27 DCMR 1304 and that [no response was received] [the response received was rejected because _____]. Based on the above findings and in accordance with the cited authority, I hereby determine that it is not feasible or practical to invoke the competitive solicitation process under either Section 402 or 403 of the District of Columbia Procurement Practices Reform Act of 2010 (D.C. Law 18-371; D.C. Official Code § 2-354.02 or 2-354.03). Accordingly, I determine that the District is justified in using the sole source method of procurement.

Date

Emma Clark
Agency Contracting Officer