Justification & Approval
For Other than Full and Open Competition

As a legislative branch agency, the Library is subject to the competition and advertising requirements of 41 U.S.C. § 6101. Like the Competition in Contracting Act and the FAR, 41 U.S.C. § 6101 does not require competition when a contracting officer certifies that only one source or brand-name item is available, when dictated by public exigency, or when otherwise authorized by law.

This document sets forth the justification and approval for award of a contract or order by means providing for other than full and open competition per 41 U.S.C. § 6101, LCR 7-210, and, as applicable, FAR 6.302, FAR 13.106-1, FAR 8.405, and FAR 16.505. Contracting without competition shall not be justified on the basis of a lack of advance planning or concerns related to availability of funds.

This form shall be used to support instances where competition will be limited to a single source, a limited number of sources, including where a brand name product is required.

Part 1 – Identification

1. Contracting Agency and Activity: Library of Congress, Visitor Engagement Office, CLLE, Office of Librarian

2. Nature of Action Being Approved

☒ Contract (or modification)
☐ LoC or Leg Branch Order (or modification)
☐ GSA Schedule or GWAC: Identify Schedule/Contract
☐ Other: Identify

Plan ID Number: 2026-CLL-0136
Contractor (or Brand Name): VSys One
Estimated Value (Base and all options): [redacted]
Period of Performance: 08/15/26-07/31/31

3. Description of Supplies or Services Required to Meet Library Needs

Describe the supplies or services that are required to meet the Library's minimum needs and the delivery schedule required to meet those needs. Do not focus on a description of the program.

The Library requires the following supplies or services:

The Library of Congress' (LOC or Library) Center for Learning, Literacy, and Engagement (CLLE) focuses on educational and cultural programming, visitor engagement, and partnerships to transform visitors into regular users of services and contributors to the Library mission. CLLE's Visitor Engagement Office (VEO) oversees volunteers who provide hours of service and in-kind donations to help fulfill CLLE's mission. Congress mandated that the Library should not accept over $10,000 in-kind donation from volunteers and enacted rules around the tracking volunteer hours (e.g. volunteer's daily/weekly/annual hours, participation, etc.) and required the Library report this information annually. A library-wide volunteer management system allows CLLE to track and report this important information.

CLLE currently utilizes a customized cloud-based volunteer management system called VSys One by Bespoke Software Inc for the scheduling, training, managing, and tracking volunteers per the Congressional mandate. The existing volunteer management system also facilitates the process of distributing information about volunteering opportunities and assists in acquiring volunteers for opportunities to specific groups of individuals.

Part 2 – Program Office Justification & Approval

4. Authority for Contracting Without Competition Over $350,000

Up to and including $350,000

For this requirement up to $350,000, using simplified acquisition procedures under FAR part 13, the basis for contracting without providing for full and open competition is:

☒ Only one responsible source is reasonably available to meet Library requirements. 41 U.S.C. § 6101(b); FAR 13.106-1.
- ☒ Product or service is reasonably available from only one source.
- ☐ Source controls copyrights, patents or other exclusive licensing arrangements.
- ☐ Urgent circumstances; only one source can reasonably deliver by required date. Option years are not permitted.
- ☐ Source is expressly authorized or required by statute: Identify the authority

☐ Library's needs can only be satisfied by a brand-name product

☐ The Product is listed the Library of Congress Enterprise Architecture Repository (LCEAR) database (Attach applicable IT Standard Data Sheet)

5. Rationale for Contracting Without Competition

In supporting an action not providing for full and open competition, it is not sufficient to demonstrate that the contractor is exceptionally well qualified or even the best qualified, or that the required brand name product is well suited to the Library's needs. The rationale must demonstrate that no one else, or no other competing product, can satisfactorily fulfill the Library's requirement. Do not focus on the importance of the requirement; the issue is the rationale for not competing.

In supporting urgency, address the following: What are the unexpected facts or the unpredictable events that led to this situation? When is the required delivery or performance start date? Why this date? What specific harm to the Government will occur if the delivery is not made or performance not begun as scheduled? (Note that expiration of funds is not sufficient harm to justify not competing.) Demonstrate that the contract is only for items and quantities urgently needed until a competitive procurement action can be developed, or that a separate competitive follow-on is not practical.

In supporting a brand name justification, the brand name or feature must be essential to the Library's requirements, and market research indicates that other company's similar products or products with similar features cannot meet or be modified to meet the Library's needs.

We are authorized to limit competition on the basis of the citation in section 4 because:

Prior to 2022, the Library did not have a designated volunteer management system capable of tracking, managing, and scheduling volunteers. The Visitor Engagement Office, as well as departments across the Library tracked their volunteers very differently or do not track at all. The system currently in use by the Visitor Engagement Office will enable the Library to professionalize the Library's "Volunteer Program," by standardizing reporting of volunteer hours worked to ensure compliance with laws governing donation limits of unpaid volunteer time.

CLLE was approved to use an alternate system (a low-cost subscription service through the LINS program). It was approved for subscription, but prior to implementation, the Library's security/accessibility policies changed and after going through training, the system (Volgistics) was rejected for future use on the grounds of non-compliance with security requirements. After conducting a needs assessment, it was determined that the only solution that meets the Library's very high threshold for security, privacy, and accessibility was VSys One. We initially found VSys through the Smithsonian Institution, and specifically through interviews with representatives from the National Museum of African American History and the National Air and Space Museum who use it to great success. To date, our market research suggests that it is the only system on the marketplace that meets our requirements that will pass the rigorous OCIO security, privacy, and accessibility compliance review under LCR 5-920, 5-410, and Section 508 of the Rehabilitation Act and Section 255 of the Communications Act.

A new contract is needed by the end of the current and final option year, ending 08/15/2026, to ensure the Library remains in compliance with posted limits for volunteer service contributions (no more than $10k in labor per year). The system will allow the Library to successfully track service donations and report those contributions to the Financial Services Division, and Congress. Target acquisition date is 08/16/2026. Non-compliance with volunteer service maximums puts the Library at a high risk for audit. It is impractical to institute a follow-up competitive acquisition, as no other system on the market can meet our security and accessibility requirements.

Additionally, the Library has already invested considerable resources into the procurement of perpetual licenses, system configuration services to adapt the software to the Library's unique needs, and the training of Library staff on VSys One. Even if another system existed which met the Library's technical and security requirements, transitioning to another system would result in significant expenditures to replace the licensing, configuration, and training that the Library has already paid for with the existing system.

In summary, LIBN/CLLE will continue to use the bespoke VSys volunteer management system to avoid disruption to operations and a potential increased risk to data integrity.

6. Actions to Overcome Barriers to Competition Before Subsequent Contract Is Required

State what actions, if any, the program office can take to overcome barriers to competition before a contracting for this requirement again, such as: using action to provide time to develop specifications for a competitive procurement by a certain date; licensing copyrights or patents so other contractors may use the works; or breaking the requirement into parts that may be purchased competitively. If this is a one-time requirement, explain that action to increase future competition is not needed. If the source is expressly required by statute, state "Source is statutory."

To increase competition, we will: Continue to conduct market research to identify potential new vendors/products that align with the existing and future volunteer management needs for Visitor Engagement Office and meet all LOC IT security and accessibility and PII requirements.

7. Program Office Certification

I certify that the description of the Government's minimum needs, schedule requirements, and technical information that provide the basis for this justification are accurate and complete.

[redacted] __07/30/26_____
_____ Date

Name Title Signature

PART 3 – CONTRACTING OFFICER DETERMINATIONS & CERTIFICATION

8. Efforts to Solicit from As Many Potential Sources As Practicable

Unless a justification is based on FAR 6.302-2, Unusual and compelling urgency, contracting officers shall post justifications for other than full and open competition, including brand name justifications, to the Contract Opportunities website on sam.gov (or eBuy for Brand Name Justifications under FAR Part 8) prior to requesting a proposal or otherwise entering into negotiations.

☒ Advance notice will be published in sam.gov for 15 days before a contract is awarded. FAR 5.203(a).
☐ Advance or concurrent notice will be published in sam.gov for a reasonable time for commercial items FAR 5.203(a) and 12.204(b).
☐ Advance notice will not be published because the action meets the following FAR exception:
- ☐ Notice would compromise national security. FAR 5.202(a)(1).
- ☐ Unusual and compelling urgency; notice period would seriously injure Government. FAR 5.202(a)(2).
- ☐ Expressly authorized or required to be made through another Government agency. FAR 5.202(a)(4).
- ☐ Order will be placed against an IDIQ contract awarded under FAR 16.5. FAR 5.202(a)(6).
- ☐ Order will be placed against GSA schedule or other competitively-awarded contract. FAR 5.202(a)(11).
- ☐ Other:

☐ Advance notice will not be published per 41 U.S.C. § 6101; see attached deviation from the FAR per LCR 7-210 § 3.A.

We made the following efforts to interest potential sources in this award: *N/A*

9. Listing of Sources That Expressed Interest in Writing

The following sources expressed interest in this award: N/A

10. Additional Information

The following additional information is relevant to this justification and approval: N/A

11. Contracting Officer Determination that Price Is Fair and Reasonable

As explained in detail below, I have determined that the prices for this contracting action are fair and reasonable based on comparison of the prices to the following (see FAR 15.404-1(b)(2)):

☒ Historical prices paid by the Government
☐ Library's Independent Government Estimate
☐ Other:
☐ Published competitive price lists
☐ Prices obtained through market research
☐ Prices obtained through competitive proposals

The following analysis (based on attached pricing information) supports my determination: Price reasonableness will be determined at time of award

12. Contracting Officer Determination of Responsibility

☒ Checked System for Award Management (or will check in the case of competitive proposals for a brand name product)

13. Contracting Officer Determination of Best Value

I have determined that this action represents the best value to the Government because: only one product, which is not sold through resellers, is reasonably available to meet the Library's needs. For the reasons listed above, the procurement of this product on a sole source basis is in the best interests of the Library.

14. Contracting Officer Certification

I certify that, to the best of my knowledge and belief, this justification is accurate and complete. For those actions up to $900,000, I approve contracting without competition for this requirement.

Name	[redacted]	7/28/2026 Date

Part 4 – Competition Advocate Approval
(Required for actions valued at greater than $900,000)

☐ **Approved.** Based on the information, determinations, and certifications provided by the program office and the contracting officer, and in accordance with the instructions below, I approve contracting without competition for this requirement.

Option periods: ☐ No ☐ Yes, Number through Date

☐ **Not Approved.** As explained below, I do not approve contracting without competition for this requirement.

Comments or instructions:

_____	Assist/Assoc General Counsel	_____	_____
Name	Title	Signature	Date

Part 5 – Senior Procurement Executive
(Required for actions valued at greater than $20,000,000)

17. Head of the Procurement Activity Approval

☐ **Approved.** Based on the information, determinations, and certifications provided by the program office and the contracting officer, and in accordance with the instructions below, I approve contracting without competition for this requirement.

☐ **Not Approved.** As explained below, I do not approve contracting without competition for this requirement.

Comments or instructions:

_____	Director, Contracts and Grants	_____	_____
Name		Signature	Date