



**DETERMINATION AND FINDINGS  
FOR A  
SOLE SOURCE CONTRACT**

**CAPTION:** Records and Data Management Services  
**SERVICE PROVIDER:** Iron Mountain  
**AGENCY DIVISION/ PROGRAM:** Benefits Department

**FINDINGS**

**1. AUTHORIZATION:**

7 DCMR §1608

**2. MINIMUM NEED:**

The District of Columbia Retirement Board (DCRB) seeks a Contractor to provide document storage, filing, digital image on demand and daily electronic data tape back-up services to support DCRB's records and data management mission requirements.

**3. ESTIMATED REASONABLE PRICE:**

The estimated base period price of the sole source contract is not to exceed \$99,800.00.

**4. BACKGROUND**

The District of Columbia Retirement Board (DCRB) is an independent District of Columbia government agency pursuant to the District of Columbia Retirement Reform Act, as amended (Reform Act). In accordance with the Reform Act and the Police Officers, Fire Fighters and Teachers Retirement Benefit Replacement Plan Act (Replacement Plan Act), the Board is responsible for managing the investments of the Retirement Funds. DCRB also manages retirement and post-employment benefit programs for participants and beneficiaries of those Funds.

**5. FACTS WHICH JUSTIFY SOLE SOURCE PROCUREMENT:**

- a. DCRB is required to comply with Federal and District laws and guidelines that require historical financial records of contributions, purchases of service, benefit payments, refunds, investment earnings, investment expenses and administrative expenses to be maintained, accessible, and secured for extended periods of time. Similarly, the information, documents and records must be accessible and retrieved when auditors, attorneys, actuaries, members, other interested parties have a need to review physical or digital files and data. Furthermore, DCRB is required to ensure that Personally Identifiable Information (PII) is maintained, housed, and archived in a safe and

secure environment that is located off-site from DCRB's main office but accessible in a timely manner.

- b. DCRB has maintained Iron Mountain for records and data management services since 2007. Currently, Iron Mountain is storing and protecting the DCRB member records in their secure repository. As of 1/1/2021, the following record count and request for files for the last 4 years is listed below:

<b>Iron Mountain Report 2022</b>	
<b>Box Count</b>	997 Boxes
<b>File Count</b>	19,689 File Records
<b>Requests Per Year</b>	
<b>2022</b>	4 Requests (Digital)
<b>2021</b>	4 Requests (Digital)
<b>2020</b>	12 Requests (Digital)
<b>2019</b>	17 Requests (Digital)

- c. Although discussions with the District's Records Management authorities have taken place within the last couple years, there is no funding, plan, risk analysis, or agreement to transfer custody of historical and new DCRB records to a new facility.
- d. Departments including Benefits, Investments, Business Operations, Information Technology, Benefits staff frequently is requesting historical physical files for legal matters, recalculation and review of benefit cases, processing of survivor annuities requiring access to historical records, of the original annuitant, confirmation of employee contributions and refunds, and adherence to multiple required audits per year.
- e. DCRB has made significant human resource acquisitions and changes in the last 2-3 years at the trustee, executive, department leadership, and staff levels. As the agency navigates change and transition management, it is necessary to train, plan and meet with the agency's primary stakeholders and operational staff to review, recommended, and establish updated procedures to inventory, maintain and prepare for any potential transfer the records to a new vendor. Likewise, transitioning records management to another Contractor will require vendors and DCRB staff to schedule site visits for transitional project management meetings, physical and electronic records removal and new housing, and project oversight that was not feasible during to the COVID 19 health crisis. Last, there is valid concern regarding Contractor responsiveness as DCRB and the business community work to reestablishes normal business operations and support after the COVID-19 disruptions.
- f. Open competition is not practical or reasonable for this service currently. Market research did not reveal enough Contractors with the infrastructure, capacity, or proximity to DCRB to efficiently and cost effectively assume control of DCRB records and data management infrastructure to include storing, retrieving, refilling, transporting, and accounting for DCRB

files at its facilities. There is not a sufficient number of vendors to promote competition or invite to participate in a solicitation.

- g. Maintaining document storage and filing are crucial components of DCRB's daily business and financial operations solution set and ensures that employees have rapid access to the records and data required to perform their job functions. There is therefore significant risk to DCRB operations if Iron Mountain is not maintained. DCRB Iron Mountain will therefore be awarded a sole source contract to provide document storage, filing, digital image on demand and daily electronic data tape back-up services to support DCRB's records and data management mission requirements.

**5. CERTIFICATION BY DIVISION HEAD/REPRESENTATIVE:**

I hereby certify that the above findings are true, correct, and complete.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Daniel Hernandez  
Pension Administrator  
Benefits Department

**6. CERTIFICATION BY THE DCRB PROCUREMENT OFFICE**

I have reviewed the above findings and certify that they are sufficient to justify the 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 7 DCMR §1608.3 and that no response was received. I therefore recommend that the Chief Contracting Officer approve the use of the sole source procurement method for this proposed

\_\_\_\_\_  
Date

\_\_\_\_\_  
Munetsi Musara  
Chief Financial Officer  
Finance Department

**7. DETERMINATION BY DCRB CHIEF CONTRACTING OFFICER**

Based on the above findings, and in accordance with the cited authority, I hereby determine that it is not feasible or practical to initiate a Competitive Sealed Proposal or Invitation for Bid solicitation process under either 7 DCMR §§1605 and 1606 respectively. Accordingly, I determine that DCRB is justified in using the sole source method of procurement and a notice of intent shall be published in accordance with 7 DCMR §1608.5.

\_\_\_\_\_  
Date

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Gianpiero JP Balestrieri  
Executive Director  
Chief Contracting Officer