

IN THE UNITED STATES COURT OF FEDERAL CLAIMS  
BID PROTEST

CONTINENTAL SERVICE GROUP, INC., )

Plaintiff, )

and )

COLLECTION TECHNOLOGY INC., )

PROGRESSIVE FINANCIAL )

SERVICES, INC., and )

ALLTRAN EDUCATION, INC. )

Plaintiff-Intervenors, )

and )

PIONEER CREDIT RECOVERY, INC., )

Plaintiff, )

v. )

THE UNITED STATES, )

Defendant, )

and )

CBE GROUP, INC., )

FINANCIAL MANANGEMENT )

SYSTEMS, INC., )

GC SERVICES LIMITED )

PARTNERSHIP )

PREMIERE CREDIT OF NORTH )

AMERICA, LLC, )

VALUE RECOVERY HOLDINGS, LLC, )

WINDHAM PROFESSIONALS, INC., )

Defendant-Intervenors. )

No. 17-449C  
No. 17-499C  
(Consolidated)  
Chief Judge Susan G. Braden

**DECLARATION OF DR. PATRICK A. BRADFIELD,**  
**HEAD OF THE CONTRACTING ACTIVITY, FEDERAL STUDENT AID,**  
**UNITED STATES DEPARTMENT OF EDUCATION**

I, Patrick A. Bradfield, Director, FSA Acquisitions and Head of the Contracting Activity, Federal Student Aid (FSA), United States Department of Education, hereby make the following declaration in lieu of an affidavit, as permitted by Section 1746 of Title 28 of the United States Code. I am aware that this declaration will be filed with the United States Court of Federal Claims in connection with the bid protests filed by Continental Services Group, Inc. and Pioneer Credit Recovery, Inc., Fed. Cl. Nos. 17-449C and 17-499C; Account Control Technology, Inc., Fed. Cl. No. 17-493C; Alltran Education, Inc., Fed. Cl. No. 17-517C; Progressive Financial Services, Fed. Cl. No. 17-588C; Collection Technology, Inc., Fed. Cl. No. 17-578C; and Van Ru Credit Corporation, Fed. Cl. No. 17-633C, and any related cases or appeals. I also understand that this declaration is the legal equivalent of a statement under oath. This declaration is provided for the purpose of supporting a status report being filed by defendant. I make this declaration to the best of my knowledge and belief, based on my personal knowledge and information made available to me in my official capacity:

1. On August 2, 2017, the Court ordered the Government to provide a status report in these cases. In that order, the Court referenced the Notice filed by the Government on May 19, 2017, in which the Government indicated that the Department would undertake certain corrective action, and complete that corrective action by August 25, 2017. The corrective action entails the Department soliciting revised proposals, re-evaluating those proposals in accordance with the announced evaluation criteria, conducting a new source selection determination, and announcing any new award or awards, and the termination of previously-awarded contracts, if appropriate.
2. The Department received 37 revised proposals which are being considered in the re-evaluation. As of today, the Department's evaluation teams have completed their review of more than half of those 37 proposals.
3. The Department is still aiming for an announcement on August 25, 2017. However, there are key aspects of the evaluation process in the coming days that may cause a slippage in the schedule, including but not limited to record preparation and various internal reviews. The Department also may decide to establish a competitive range determination and

conduct discussions, which could extend the process by a few weeks. Once prospective offerors are identified, the Contracting Officer will need to conduct a responsibility determination, which may include exchanges with some offerors and the negotiation of subcontracting agreements. The completion of some of these activities will require input from offerors, and from the Small Business Administration in the case of subcontracting plans, and is therefore not entirely under the control of the Department.

4. Another contingency that may impact the schedule is the protest of Automated Collection Services, Inc. (ACSI), Fed. Cl. No. 17-765. That protest, initially filed on or about June 9, 2017, challenges one aspect of the Department's on-going re-evaluation. I understand that briefing on ACSI's protest was completed on July 27, 2017, and we are awaiting a decision from the Court.
5. This re-evaluation process is a top priority of FSA. The Court and the parties to this litigation should rest assured that FSA is proceeding diligently with the re-evaluation, cognizant of the need to finalize the corrective action expeditiously, while also ensuring that all requirements of the law are met and the interests of the Government are protected.
6. As we get closer to August 25, 2017, should the Department determine that this deadline will not be met, the Department will alert the Department of Justice right away so they can provide the Court with an updated schedule.

I declare under penalty of perjury that the foregoing is true and correct; executed this 4<sup>th</sup> day of August, 2017.

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Dr. Patrick A. Bradfield  
Director, FSA Acquisitions & Head of Contracting Activity  
Federal Student Aid  
United States Department of Education