

CLIENT ALERT

Agency Failure to Consider Proposal Differences Invalidates Award

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In *One Largo Metro LLC* (June 20, 2011), GAO sustained three protests to a best value procurement for office space for HHS when GSA evaluated one of the technical subfactors in a manner inconsistent with the solicitation and failed to consider meaningfully the evaluated differences in the proposals. Regarding the latter protest ground, the source selection official, by disregarding the recommendations of the lower-level evaluators without explanation, did not conduct a well documented, meaningful consideration of the identified technical differences between the proposals and instead based her decision on a mechanical comparison of the subfactor ratings assigned by the lower-level evaluators. For more information, please contact the professional(s) listed below, or your regular Crowell & Moring contact.