

**Response to Request for Information Response
RFI 1594419 Amended**

Analytics

Submitted to:

**U.S. Dept. of Treasury, Internal Revenue Service (IRS)
Washington DC
Atten: Christopher.Monosiet@irs.gov**

Sue: November 21, 2022 3:00 P.M. EST

Submitted by:

**Bridging Technologies LLC
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Company Overview

Info	BT Details
<i>Company</i>	Bridging Technologies LLC
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<i>Phone number</i>	202-248-5049
<i>Company's socioeconomic status / size classification</i>	Woman-owned (8m), HUBZone certified small business located in Washington, D.C
<i>Company DUNS</i>	_961969677
<i>Contract Vehicles</i>	GSA Schedule, NIH CIO SP3, NASA

Statement of Interest

Bridging Technologies LLC (BT) is interested in supplying BT has, since its inception, been an Information Technology Infrastructure and Managed Service business. BT's name embodies our mission to be the bridge between the government and technological tools to enable mission success. BT, a HUBZone certified small business and GSA-certified woman-owned small disadvantaged business. Our team has an industry reputation for quality, innovation and the demonstrated ability to deliver results. Founded in 2003, BT is a financially stable company with no debt and excellent Dun and Bradstreet Open Ratings that showcase low risk.

With more a substantial team of experts in information technology (IT) and other fields, we are a growing small business. BT provides comprehensive IT infrastructure, architectural and development support for both civilian and non-civilian agencies. In addition to expert consulting, we provide front-line support, as well as back-office infrastructure and services. Our subject matter experts (SMEs), technologists, analysts, and engineers are experienced in performing a wide range of tasks across multiple IT areas, and hold active TS and other clearances.

We understand the IRS seeks support services in developing and testing hypotheses defining short and long-term security, user-experience, capability, tax compliance and service support strategies. BT is well-suited to provide rapid responses addressing emerging issues in areas relevant to the agency, including: Taxpayer Behaviors, Identity Theft, Refund Fraud and Revenue Protection, Filing and Payment Compliance, and Reporting Compliance. BT SMEs can advise the agency on the operational use of artificial intelligence techniques, system security and data privacy enhancement, data strategy and governance, and on the subject of emerging and advanced data analytics.

Summary of credentials/professional experience

BT's customer base includes, but is not limited to, prime and sub-contract awards, with the Department of Defense (DOD); Department of Homeland Security; Department of Labor (DOL); Health and Human Services (HHS) National Institutes of Health (NIH), and the Federal Aviation Administration (FAA), among others. A overview of the strength of the BT team is shown in the following exhibit.

Criteria	Key Strength of the BT team
Key Personnel	We will provide 100% of the technical staff on day one of the contract, owing to our bench support capabilities. The BT team will ensure that all personnel on the contract meet all of the requirements of their assigned labor categories and that they perform all work up to the standard that is expected for their labor category.
Management Approach	A key benefit of our approach and commitment to IRS is the assignment of a very senior and knowledgeable Program/Project Manager (PM) with extensive background in Audio-Visual, IT managed services, and Operations & Management, and system/network administration and engineering.
Understanding the Scope and IRS's Challenges	Our experience with similar contracts and our capabilities speak directly to many of the IRS's needs and expectations, as identified in the RFI.
Subject Matter Expertise	Our expert consultants understand AI's capacity to predict and adapt, so tools can be built to speed making decisions. Our experts design AI based on continual learning models, so the software is reactive and forward-looking.
Relevant/Related Experience	We offer specific expertise, balanced with breadth and depth of experience and understanding on IRS's current mission-critical projects. This enables us to offer extra value that sets us apart from other firms.

Realizing the imperative to think about quality management from a total systems perspective, the Malcolm Baldrige National Quality Improvement Act of 1987 offered a template for implementing a set of high-performance management practices, including customer-orientation, business process management, high levels of employee involvement and fact-based management. This framework reinforces the nomological network perspective by emphasizing the tight interconnections between different elements, including information and analysis, process management, customer and market focus, leadership, strategic planning, human resources management. BT's experience at a dozen agencies supports the validity of the individual dimensions captured within the Baldrige criteria. Of particular significance to IRS, this framework acknowledges that the management of information technology assets and information flows is a critical enabler of an agency's success.

We focus on IT infrastructure capability with a focus on composite components (including hardware, software, data storage and networks) and information, applications, and utilities delivered to business users from that foundation of IT components. Further, BT maintains capabilities and

staff expertise in three significant IT-enabled organizational areas: (a) performance management, or the ability to develop appropriate monitoring, evaluation, and control systems to observe business performance and guide managerial actions; (b) customer relationship management capability, or the ability to develop significant customer relationships and nurture customers both as consumers as well as innovation partners in new solutions development; and (c) process management, or the ability to develop processes with appropriate reach and richness for guiding agency IT operations, OCIO support, financial, and other important IT infrastructure capabilities and activities.

BT suggests IRS consider several critical assumptions, risks, constraints, based on lessons we've learned in our years in this business. We suggest a risk management framework approach, to help IRS to quantify, qualify and manage reputation, transaction, regulatory and other risks associated with outsourcing non-core business operations, applications and services to third-parties. While responsibility for performance and delivery may be contracted to a third party, the agency will benefit from performing their own due diligence to confirm the implementation of required controls and processes by their business associates. Such risk management program ensures that the regulatory and cyber security considerations are met to the extent necessary to protect the agency and its stakeholders.

Further, IRS should consider system-level risk management — which BT sees as predominantly the responsibility of the team working to provide capabilities for a particular IT effort. Within a system-level risk area, the primary responsibility falls to the system program manager and systems engineers for working risk management, and the developers and integrators for helping identify and create approaches to reduce risk. In addition, a key responsibility is with the user community's decision maker on when to accept residual risk after it and its consequences have been identified.

BT has found that thinking of ITSM as a “system-of-systems” is the optimal approach for overseeing the important infrastructure that supports an agency. This system-of-systems is should move towards a Service Oriented Architecture, where services and systems that are related or interconnected provide a given capability that, otherwise, would not be possible. The loss of any part of the supporting systems degrades or, in some cases, eliminates the performance or capabilities of the whole — a major factor when making risk mitigation decisions, in BT's experience. An important lesson we have learned is that lack of clearly defined system boundaries, management lines of responsibility, and accountability further challenge the management of risk in the engineering of systems-of-systems. User and stakeholder acceptance of risk management, and their participation in the process, is essential for success.

Questions About Requirement, Recommendations to Improve

After a complete review of the RFI, BT recommend the government consider:

- Periodic assessments of risk, including the magnitude of harm that could result from the unauthorized access, use, disclosure, disruption, modification, or destruction of information and information systems that support the operations and assets of end users;
- The IRS should consider specific risks around the use of artificial intelligence: Privacy, as data is the lifeblood of any AI model; Security, in that new AI models will continue to have complex, evolving vulnerabilities that create both novel and familiar avenues for attacks by nefarious parties; and, Fairness, managed through transparency and explainability. ...
- Policies and procedures that are based on risk assessments cost-effectively reduce information security risks to an acceptable level and ensure that information security is addressed throughout the lifecycle of each information system;
- Periodic testing and evaluation of the risk motivations around implementation of technical data analytics and processes, particularly when implementing AI for problem solving, issue identification, and decision support.
- BT suggests the agency consider subdivision of the activities envisioned for a procurement so as to ensure the IRS has access to best-of-breed solutions and the right subject matter experts to support this important initiative. It may be difficult to ensure the entirety of the work could be carried out by a single small business or other 8(a)/SDB, given the variety of specialties that the RFI identifies.
- Finally, the IRS should require in a procurement that the respondents address plans to ensure continuity of operations for information systems that support the operations and assets of AI-based data analytics, and procedures for detecting, reporting, and responding to security incidents.

Along with subdivided the workload, the use of Performance-Based Contracting is likely a reasonable approach. Besides federal agencies, several States other entities that have been leaders in performance-based contracting: including Virginia, Texas, Florida, the District of Columbia. PBMC reflects a long-term trend in changing the focus of upper management and maintenance managers to outcomes, especially those that are customer oriented. The use of existing schedules and the IDIQ / Blanket Purchase Agreement will speed responsiveness in the procurement process, as this means pre-qualified vendors can react quickly when the agency makes a decision to move forward.

Past Performances

CLIENT NAME *	POINT OF CONTACT NAME, ADDRESS, TELEPHONE	TYPE OF SERVICES PROVIDED	CONTRACT NUMBER AND VALUE OF CONTRACT	DATE SERVICES PROVIDED	PRINCIPAL PARTNERS/KEY PERSONNEL
HUD Office of Financial Services (OFS)	Isaac Berko, Branch Chief-Multifamily Claims, 451 7th St, SW Washington, DC 20410 202-402-5906	Technical Assistance to public housing agency	86615722C00014 \$1,800,000	9/2022 - Current	Stephanie Johnson Project Manager
Disaster Recovery Services	Dr. Kimberly Adams, Project Manager, 2229 San Felipe St. STE 1200, Houston, Texas 77019 (601) 695-6541	Financial Compliance reviews for funds distributed in the CARES and ARPA Acts	\$875,000	3/2021-Ongoing	Stephanie S Johnson, CPA
CohnReznick LLP	Andrew Yowler, Manager, 816 Congress Street, Austin, Texas 78701 512-822-7929	Compliance Monitoring and tracking of grant program associated with Hurricane Harvey.	\$210,000	2/2018 – 11/2019	Stephanie S Johnson, CPA

* If performance was as a subcontractor, this will be the name of the prime contractor.