JUSTIFICATION AND APPROVAL
FOR OTHER THAN FULL AND OPEN COMPETITION
41 U.S.C. 3304(a)(1)

FY26-0142

Pursuant to the requirements of the Competition in Contracting Act (CICA) as implemented by the Federal Acquisition Regulation (FAR) 6.103 (FAR Class Deviation 25-11[1]) and in accordance with the requirements of RFO 6.104, the justification for the use of the statutory authority under RFO 6.103 is justified by the following facts and rationale required under RFO 6.104-1 as follows:

1. Agency and Contracting Activity

The Department of Homeland Security (DHS) Office of Procurement Operations (OPO) Science and Technology Acquisition Division (S&TAD) proposes to enter into a task order modification on the basis of other than full and open competition.

2. Nature and/or Description of the Action being Approved

(a) Nature of action.

The purpose of this action is to issue a modification to an existing task order 70RSAT23FR0000019 for Systems Engineering and Technical Assistance (SETA) III Support Services Indefinite Delivery/Indefinite Quantity (ID/IQ) contract 70RSAT19D00000002 with ManTech SRS Technologies, Inc. for a five-month extension on a non-competitive basis. ManTech has the capability and the required resources to continue to perform these in-scope services as identified below.

The DHS Science and Technology Directorate (S&T) Office of Science and Engineering (OSE) Systems Engineering and Standards (SES) Division requires an extension of this support in order to ensure continuity services and delivery of critical activities and to mitigate risks to the mission particularly, SES's ongoing and anticipated specialized Systems Engineering (SE) activities., an extension is essential to maintaining continuity, adapting to changing mission requirements, and ensuring robust stakeholder participation. Full and open competition at this time would introduce unacceptable risks to mission delivery, financial compliance, and U.S. strategic interests. The requested extension is the only viable approach to ensure uninterrupted, expert support for SES's critical SE programs.

(b) Name and address of the contractor.

[1] In this document, citations to RFO Parts 6, 10, 15, 25 are citations specifically to FAR Class Deviation 25-11 for FAR Part 6, FAR Class Deviation 25-06 for FAR Part 10, FAR Class Deviation 26-08 R1 for FAR Part 15, and FAR Class Deviation 25-09 R1 for FAR Part 25, which were issued as part of the Revolutionary FAR Overhaul (RFO), implemented in response to Executive Order 14275, ***Restoring Common Sense to Federal Procurement***, signed April 15, 2025.

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(c) Contract type(s).

Hybrid of Firm Fixed Price (FFP) and Time and Material (T&M).

(d) Summary of the extension.

Extension Period (Duration)	Dates
Extension (5.5 Months)	06/19/2026 to 11/30/2026

(e) Type of Funding.

The type of funding is Operations and Support (O&S) as part of Acquisitions and Operation Analysis (AOA).

(f) Year of funding.

2-year FY25 A5 funds.

(g) Solicitation number.

Not applicable. This action will be a modification to an existing task order.

(h) Background information about the requirement.

S&T partners and customers include the operating Components of the Department, other Government agencies, State, local, tribal, and territorial emergency responders and officials. S&T, established by the Homeland Security Act of 2002 (P.L. 107-296), has the primary responsibility for research, development, test, and evaluation (RDT&E) efforts in support of the DHS's mission.

SES directly supports S&T's goals to drive innovation within the Department, engage with science and technology communities on behalf of DHS, provide S&T expertise and solutions to the components, and build DHS' S&T workforce and expertise for the future.

SES provides matrixed Systems Engineering (SE) support to Research and Development (R&D) and Acquisition Programs (including Human Systems Integration (HSI), Standards and Enterprise Architecture (EA) support), and key Department wide support functions. The SES Division Director acts as the Principal Technical Advisor to S&T Leadership in areas related to SE and represents S&T on the DHS Enterprise Investment Board, providing technical risk information on major acquisition programs. SES is also

responsible for performing Technical Assessments on DHS Acquisition Programs, as required under DHS Instruction 102-01-001; as well as acting as the DHS Standards Executive. SES serves as the S&T Requirements Gatekeeper for all artifact reviews previously managed under the JRC Joint Requirements Integration and Management System (JRIMS); provides SE advisory support to DHS Acquisition Oversight Offices; provides SE, HSI, Standards, and EA support to DHS Acquisition Programs and manages SE Policy and Guidance for the Department. In addition, SES leads DHS SE, HSI, and standards workforce development for the Department as well as the DHS HSI Community of Practice (CoP), the Systems Engineering Center of Excellence and the DHS Standards Council and implements provisions of the Invention Secrecy Act. SES also plays a significant role in the developing discussions of EA framework applications in the acquisition process.

The period of performance of this competitively awarded task order began on 04/03/2023 and, unless extended, will expire on 06/18/2026.

This extension will enable SES to continue to utilize the highly specialized contractor support needed while continuing acquisition planning (including market research) for a new competitively awarded task order.

The market research report for the competitive recompete of 70RSAT23FR0000019 is under development.

3. Description of Supplies/Services

The SES SETA III project requires an extension of five months from 06/19/2026 to 11/30/2026.

Through SES's SETA III project, ManTech has assembled a team that provides expert–level technical services that are not available within the Government. This specialized contractor support is crucial to provide the Government with critical engineering expertise in specialized areas such as cybersecurity, artificial intelligence, shipbuilding, chemical/biological detection, biometrics, and counter-unmanned aerial systems, essential for the technical development and risk management of major acquisition programs within DHS Operating components.

Through task order 70RSAT23FR0000019, ManTech provides both broad and deep SES support through the following 12 tasks:

Task 1 - Program Business Office (PBO);
Task 2 - Systems Engineering Policy Development and Outreach Support;
Task 3 - S&T Program Support and Assessment Support;
Task 4 - Acquisition Program Support and Assessment;
Task 5 - Program Management Support;
Task 6 - Application Support Services (SharePoint);
Task 7 - Technical Editor;

Task 8 - Human Systems Integration Support;
Task 9 - Standards Branch;
Task 10 - Systems Engineering Classroom Instruction;
Task 11 - Invention Secrecy Act (ISA) Support; and
Task 12 - Systems Engineering and Standards Surge Support.

In addition, ManTech provides engineering analysis support for the acquisition and deployment of counter-unmanned aerial systems for upcoming high-profile events like the Fédération Internationale de Football Association (FIFA) (International Association Football Federation) World Cup. Any cessation of these engineering expertise and services would result in significant system development and delivery delays, substantial cost overruns, increased risk of system performance failures, and widespread operator dissatisfaction.

Without this extension, unacceptable risk to ongoing work at SES would be introduced and would result in a significant loss of continuity of services. Anything other than an extension of the existing task order would seriously and materially compromise the work of SES and the mission of DHS.

This five-month extension allows the critical services to continue during the development of the market research report. The Federal Government shutdowns in FY26 have drastically impacted the Government's ability to conduct market research for the recompete.

4. Identification of Statutory Authority Permitting Other Than Full and Open Competition

The statutory authority permitting other than full and open competition is 41 U.S.C. 3304(a)(1) implemented by the FAR Subpart 6.103-1 (FAR Class Deviation 25-11) entitled "Only One Responsible Source and No Other Supplies or Services Will Satisfy Agency Requirements.".

5. Demonstration that the proposed contractor's unique qualifications or the nature of the acquisition requires use of the authority cited

(a) Rationale for using the authority cited in Section 4 of the J&A;

ManTech possesses unique and specialized knowledge of DHS's SE requirements, activities, and stakeholders. This SETA team has built key relationships to enable navigating differing technical, policy, and acquisition nuances. Market research conducted in 2022 showed that it would not be feasible to assemble a new contractor team that could achieve the level of knowledge and expertise within the period of this proposed extension. Any efforts to conduct a competitive procurement and then potentially transition to a new vendor prior to the end of the current period of performance would introduce unacceptable risk to ongoing SE activities and implementation, potential delays, misalignment with stakeholder and partner expectations, and significant loss of continuity in acquisition execution. Anything other than an extension of the existing task order would seriously and materially compromise

the work of SES and the mission of DHS.

Based on the limited contemporary market research in 2026, ManTech is the only responsible source, and no other supplies or services will satisfy agency requirements because of the timing as a result of recent appropriations interruptions and the contractor's institution knowledge and niche services regarding highly specialized expertise regarding: Program Business Office (PBO); Systems Engineering Policy Development and Outreach Support; S&T Program Support and Assessment Support; Acquisition Program Support and Assessment; Program Management Support; Application Support Services (SharePoint); Technical Editing; Human Systems Integration Support; Standards Branch; Systems Engineering Classroom Instruction; Invention Secrecy Act (ISA) Support; and Systems Engineering and Standards Surge Support.

Attempting to the compete this this extension and awarding a contract to any other source would result in an unacceptable risk of service interruption and mission degradation.

(b) Details covering what events lead to the situation requiring use of other than full and open competition procedures including whether any portion of the work can be segregated to allow for competition.

The Government shutdowns between October 1, 2025 and April 30, 2026 were a significant cause of delays that impacted the acquisition strategy and milestone schedule for the next iteration and updated description of this requirement. S&T's partners continued to pursue their roles under pre-existing arrangements necessitating rapid efforts when S&T personnel and support contractors were recalled from furlough. The contractor will support the SE team to meet obligations and deliverable milestones outlined in this task order, such as, but not limited to:

ACQUISITION ACTIVITIES

- Support ICE Acquisition (Summer 2026)
    - Conduct technology assessment and architecture modeling of preferred solution approaches
    - Support execution of Cyber Table Top Exercise to refine requirements and identify attack surfaces and potential vulnerabilities for solutions.

- Conduct a Technical Assessment of the CBP Biometric Entry-Exit Land System for biometric verification of travelers arriving via personally-owned vehicles (POV). (Summer 2026)
    - Identify sources of technical risk that could impact the deployment and operation
    - Provide recommendations to address sources of technical risk and improve program success.
    - Provide direct support to the program as requested to implement recommendations and manage technical risk.

- Conduct planning for the Technical Assessment of the Financial Systems Modernization (FSM) Cube Program. (Summer / Fall 2026)
    - Support the Joint Program Management Office (JPMO) to identify sources of technical risk that could impact the development and deployment of the FSM solutions as they are restructured.
    - Provide recommendations to address sources of technical risk, implement and use model-based systems engineering tools, and improve program success.
    - Provide direct support to the program as requested to implement recommendations and manage technical risk.

- Deliver Technical Assessment Report for USCG Homeland Security Cutter – Light and Medium (Summer 2026)
    - Identify sources of technical risk for the design, development, and deployment
    - Provide recommended courses of action to manage sources of risk and improve likelihood of program success.
    - Continue to support program in execution of recommended activities and ongoing risk identification and management of technical risks in support of technical reviews.

- Provide systems engineering and requirements development support to U.S. Customs and Border Protection program (Summer, Winter 2026)
    - Support development and reviews of fundamental and complete solution architecture artifacts to effect increased automation and efficient cloud migration objectives.
    - Assist the program in adjusting prioritization and development plans impacted by new legislation, executive orders, policy changes, and changing tariffs and regulations.
    - Advise program technical staff in planning technical activities as directed by the acquisition decision memorandum that dictated a tailored approach to development, test and evaluation, and deployment

- Provide systems engineering and requirements development support to U.S. Customs and Border Protection Non-Intrusive Inspection – Integration (NII-I) program (Summer / Winter 2026)
    - Support development and reviews of fundamental and complete solution architecture artifacts to effect integration of stand-alone imaging systems into a networked cargo screening and inspection system of systems and support successful completion of the Enterprise Architecture Board #4 review.
    - Advise program technical staff during development of acquisition and requirements artifacts that will inform the ADE-2B decision.

POLICY AND WORKFORCE DEVELOPMENT ACTIVITIES

- Support Classes required for certification (July, August, and October 2026)
    - Courses to be taught:
        - FSE 201 – July 27-31
        - FQN 491 – August 17-21
        - FQN 491 – October 19-23
        - Digital Engineering "Show Me DE Series" (Once Per Month)
    - Coordinate with Homeland Security Acquisition Institute (HSAI) for the logistics of the class (registration, participant size, loading briefing materials, administration of quizzes, and final grades).
    - In coordination with other Subject Matter Experts (SME's) in both the Government and industry, Develop briefing materials for these classes as well as defined learning objectives and topics for discussion in each class.

- Coordinate the transition of classes from HSAI lead to FAI instructions (Summer 2026)
    - Coordinate with HSAI personnel concerning what classes and topics will not be covered in the certification pathways, and determine how these topics will be addressed in SE specific classes
    - Review the current curriculum to identify the prerequisite material and learning objectives for SE and TM certification and areas of opportunity.

- Support updates to Acquisition Policy and subsequent Acquisition Pathway Instructions and Guidance. (Summer, Fall, Winter 2026)
    - Provide reviews and recommendations to inform new policy development specifically as it relates to the responsibilities and authorities of the USST and Director of Systems Engineering and Standards.
    - Provide feedback and guidance to Components and MGMT regarding the implementation and oversight of Systems Engineering and Requirements Development activities in alignment with Acquisition Policy.

- Assist with preparation of updated Systems Engineering Policies and supporting Guidance to align with revised Acquisition Directive and Instructions. (Summer, Fall, Winter 2026)
    - Provide Templates for Required Artifacts, to include a Systems Engineering Plan (SEP) Annotated Template
    - Assist with revision of current Systems Engineering Policies to improve alignment with revised Acquisition Directive (102-01) and Pathway Instructions (102-01-XXX).
        - Systems Engineering Instruction (102-01-103)
        - Technical Assessment Directive (102-05)
        - Technical Assessment Instruction (102-05-001)
    - Assist with making updates to supplemental guidance to align with revised policies
        - Significant updates to the Systems Engineering Guidebook

        - Revisions to the Technical Review Guide
        - Revisions to the Technology Readiness Assessment / Manufacturing Readiness Assessment Guidebook
        - Significant revisions to the Systems Engineering Security Guide
        - Development of Program Protection Plan Guidance and Template
    - Host Systems Engineering Center of Excellence (prior to October 2026) to discuss policy changes and impacts to SE activities.

HUMAN SYSTEMS INTEGRATION ACTIVITIES

- Plan and support the HSI Community of Practice meeting(s) to include training materials and inform policy development for the incorporation of human systems integration requirements and capabilities across the DHS Enterprise. (June, August, September, and November 2026)
    - Develop topics relating to existing HSI issues to present that are relevant to the DHS component HSI Professionals
    - Coordinate with DHS Components to ensure that the topics are relevant and of interest to the DHS Enterprise HSI professionals and in alignment with emerging guidance for the updated acquisition efforts.
    - After completion of the meeting provide minutes, to include releasable briefing material and action items, to the CoP members.

RESEARCH AND DEVELOPMENT ACTIVITIES

- Cryptocurrency Capability Roadmap. Support execution of cryptocurrency development efforts led by MCS PM. (Summer 2026)
    - Meet with and adjudicate comments received from CBP National Targeting Center
    - Further refine and add a suite of R&D projects through collaboration with MCS PM, NTC, HSI and other Federal Partner development efforts.
    - Support (and influence) standards development for law enforcement cryptocurrency software.
    - Support project(s) SOW development or technical review, BAA technical support, performer proposal technical evaluations, CDR/PDR, Analysis of Alternatives, project risk register management and Technical Readiness Assessments.

- CBP Non-Intrusive Inspection Capability Roadmap Support. Work requested by CBP NII PM. (Summer / Fall 2026)

- Support analysis of system development pathways for RDT&E Need Detection Technologies to Track Underwater Vehicles (BPF0002460). Develop and execute courses of action to support identification of preferred solution approaches to

reduce development costs and transition operational capabilities to improve security and reduce risk. (Summer, Fall, Winter 2026)

- Support RDT&E needs at they progress through the S&T BPF. USCG PfM indicated that she would be requesting support from SES for several USCG needs in coming weeks. (Summer, Fall, Winter 2026)

- Support S&T Counter Unmanned Aircraft System (CUAS) PEO Capability Development and Spend Plan Analysis and subsequent acquisition. (Summer, Fall, Winter 2026)
    - Perform operational readiness assessment on DHS CUAS missions to inform capability development courses of action
    - Develop Courses of Action (CoA) for CUAS capability development to inform the spend plan
    - Plan and execute requirement engineering activities to deliver capabilities to DHS and its components in accordance with the approved spend plan
    - Plan and execute systems engineering activities to support the acquisition of an all-domain Counter Unmanned Aircraft System test facility

- First Responder Resource Group Support (Potentially PEO within S&T) (Summer, Fall, Winter 2026)
    - Support Annual First Responder Requirements conference (Summer 2026) – support breakout groups, provide technical support, requirements SME guidance, follow-on support to MCS PM.
    - Assist MCS Program Managers by providing technical support for the following: SOW development, BAA development, Identification of relevant standards for BAA and/or SOW, performer proposal technical evaluations, project risk register management and support to test events.
    - Provide the following systems engineering evaluations and products when requested: CDR/PDR, Analysis of Alternatives, Technical Readiness Assessments, Manufacturing Readiness Assessments, Identification of relevant standards, Identification and/or evaluation of human factors considerations within technology designs.
    - Attend and serve at technical SMEs at critical law enforcement test events including Coastal Trident (June through October 2026) and National Robot Rodeo (August 2026).

- Contactless Vehicle Stopping Capability (CVSC) Program (Summer / Winter 2026)
    - Execute PDR, TRA and MRA to support transition partners as project prepares to enter the next phase of systems development.
    - Support major test event in December 2026, including advance work such as test readiness review and test planning.
    - General systems engineering support to aid project design including diagramming and tracking configuration management of functions to sub-systems and interfaces.

- Develop a battery of human systems integration tasks, primarily for safety and training functions.

(c) Summarize alternatives considered and why they will not work.

A comprehensive review considered several other alternatives such as the use of Federal employees and other contractors (For and Not-For Profit); however, these alternatives were not capable of providing DHS with the necessary specialized services to meet SES's specialized needs during the required period of performance.

(d) Impact to the mission that would result if the J&A is not approved and, consequently, the product or service not provided.

The mission would be impacted negatively in many ways if this justification were not to be approved, namely in that:

- A lapse in analytic support would jeopardize S&T's SES mission objectives;
- Working relationships and operational credibility would need to be established anew with completely different individuals with their own respective experiences, backgrounds, and communication styles;
- Transitioning performance to another source at this time would impose a steep learning curve and require substantial time for knowledge transfer, relationship development, and process familiarization, introducing unacceptable risk to ongoing SE activities, acquisition schedules, and continuity of operations; and
- The accuracy, speed ,and compliance of daily, weekly, and monthly sophisticated communications encompassing internal and external stakeholders as well as time sensitive deliverables would suffer greatly during an abrupt and abbreviated transition and onboarding period.

(e) Rationale for use of the nonavailability exception to the Buy American statute, including detailed information explaining why the particular articles, materials, or supplies of the class or kind to be acquired, either as end items or components, are not mined, produced, or manufactured in the United States in sufficient and reasonably available commercial quantities and of a satisfactory quality.

The Buy American Statue is not applicable to this acquisition.

6. Description of Efforts Made to Ensure that Offers are Solicited from as Many Potential Sources as is Practicable

A synopsis was posted on SAM.gov on June 8, 2026. All responses will be addressed accordingly.

7. Determination by the Contracting Officer that the Anticipated Cost to the Government will be Fair and Reasonable

The Contracting Officer determines that the anticipated price will be fair and reasonable based on task order history past performance, and similar existing contracts as held throughout DHS S&T.

8. Description of Market Research

(a) S&T continues to analyze the market research that it initiated in Fall 2025 for the recompete of SETA support services. While no separate RFI was specifically issued for this extension, the program has used the market knowledge obtained thus far to identify five-and-a-half months as the time required for the Government to conduct a recompetition of SETA requirements and for competing teams to assemble. The eight-month period provides adequate time for the Government to prepare its strategy and for interested parties of all types (including small businesses) to respond fully to the government's needs. No company, other than ManTech, has the ability to seamlessly support the ongoing programs and projects of SES in June 2026 without a significant gap for transition, onboarding, and overcoming the very steep learning curve.

(b) No patents, copyrights, and/or intellectual property are applicable to this extension.

9. Any Other Facts Supporting the Use of Other Than Full and Open Competition

There are no other facts supporting the Use of Other Than Full and Open Competition.

10. A Listing of the Sources, if Any That Expressed, in Writing, an Interest in the Acquisition

None.

11. A Statement of the Actions, if Any, the Agency May Take to Remove or Overcome Any Barriers to Competition Before Any Subsequent Acquisition for Supplies or Services Required

(a) The Government does not have any overly technical specifications or acquired data rights.

(b) Comprehensive market research is underway for the recompete, and the acquisition strategy will require HCA approval. Detailed analysis of Request for Information (RFI) results will aid in finalizing the acquisition strategy and identifying potential offerors.

Market research is expected to be finalized by early June 2026 and award of the recompete is expected by November 2026.

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13. **Contracting Officer's Certification**. I certify that the data supporting the recommended use of other than full and open competition is accurate and complete to the best of my knowledge and belief.

    /s/ Contracting Officer

14. **Technical/Requirements Personnel Certification.** I certify this requirement meets the Government's minimum need and that the supporting data, which forms a basis for this justification, is complete and accurate.

    /s/ Technical Representative

    APPROVAL:

    /s/ Procuring Activity Advocate for Competition