SOLICITATION QUESTIONS & ANSWERS (Q&A)

SAM.gov Notice ID 70B03C26R00000053

CBP Caregivers Services

Question #	Question	Answer
1	Reference SOW Section 4.C.i.4 & Section 8: The SOW mandates at least one Caregiver position for each holding pod or cell in which minor children are held. To accurately calculate the baseline 24/7 staffing requirements for our proposal, will the Government provide the total number of active holding pods/cells designated for minors at each of the identified Juvenile Priority Facilities and associated Sector locations?	The estimated annual position requirements for each sector listed within SOW section 8 should be used as the baseline 24/7 staffing requirement. These estimated number of positions also align with the number of positions indicated within solicitation Attachment 3 (Proposal Pricing Schedule).
2	Reference SOW Section 4.C.i.4 & Section 10.f.i: The SOW states caregivers must perform at a level commensurate with state-licensed daycare facilities, yet it mandates only one Caregiver per pod. To ensure we provide adequate staffing for safety and compliance, what is the maximum permitted capacity of children within a single standard holding pod/cell? Additionally, in the event of a surge, does the Government enforce a maximum caregiver-to-child ratio inside these pods?	The estimated annual position requirements for each sector listed within SOW section 8 should be used as reference for ensuring "adequate staffing" per the question. These estimated number of positions also align with the number of positions indicated within solicitation Attachment 3 (Proposal Pricing Schedule).
3	Reference SOW Section 4.C.i.5: The SOW requires 'enough additional Caregiver positions' to assist with showers, meals, and recreation without depleting pod staffing. To mathematically project the required number of these auxiliary/floater positions, will the Government provide the Average Daily Population (ADP) or historical daily intake volume of minors for the locations listed in Section 8 over the past 12 to 24 months?	The additional caregiver positions referred to in SOW section 4.C.i.5 will be accounted for within the issuance of task orders by CBP. Offerors shall project total position needs based on the estimated annual position requirements listed within SOW section 8 as well as solicitation Attachment 3 (Proposal Pricing Schedule)
4	Reference SOW Section 2 & Section 4. B: The SOW notes that Task Orders will be awarded based on fluctuating location requirements and that the CBP Background Investigation (BI) process can take up to 90 days. When a new Task Order is issued to activate a previously inactive location, how many days of advance Notice to proceed (NTP) will the Government provide the Contractor to ensure fully cleared, 24/7 staff are mobilized and ready for deployment?	CBP will provide as much advance notice as possible when issuing task orders (TOs). While CBP's expectation is that a TO will be fully staffed upon the TO's period of performance start date, CBP understands that there may be mobilization delays given CBP's background investigation process. The firm-fixed-unit-price structure of the IDIQ and resultant TOs accounts for this potential partial staffing until full staffing levels are reached.
5	Reference SOW Section 10.j: The SOW outlines mandatory orientation and annual training requirements (e.g., TEDS, Flores Settlement, PREA, Trauma-Informed Care). Are the hours spent by Contractor personnel completing these mandatory Government trainings billable to the Government, or must the Contractor absorb these hours into their fully burdened overhead rate?	Any contractor costs related to the time spent/materials used/developed by contractor personnel completing mandatory Government trainings shall be incorporated into the fully burdened hourly rates reflected in solicitation Attachment 3. There shall be no separate pricing submitted outside of solicitation Attachment 3.
6	Reference SOW Section 4.C.i.6 and Section 6.c: Section 6 lists Government-Furnished Equipment (GFE), specifically noting 'latex gloves.' However, Section 4.C.i.6 requires Caregivers to monitor children in quarantine/isolation pods for communicable diseases. Will the Government provide all advanced Personal Protective Equipment (PPE) required for these quarantine assignments (e.g., N95 respirators, gowns, face shields), or is the Contractor financially responsible for procuring and stocking specialized medical PPE?	At this time CBP OCMO does not forsee any requirement for use of specialized medical PPE. Any future need will be discussed with Program Office, COR, CO and contractor for implementation via contract modification
7	Reference SOW Section 4. B (Staffing Plan): The SOW notes that the entire CBP BI process could take up to 90 days. Does CBP allow for a provisional or preliminary 'Entry on Duty' (EOD) waiver, allowing Contractor personnel to begin working and billing under escort or limited access while the final full Background Investigation is pending?	The BI Process is controlled by CBP's Office of Professional Responsibility (OPR). Onboarding will not be permitted to any employee who does not have at a minimum a limited BI clearance. Any determination for limited clearance will be granted by OPR.
8	Reference SOW Section 3.0 & Section 4. B: The Contractor is required to submit personnel for the CBP BI. Are there any Government-assessed fees, fingerprinting costs, or NBIS processing charges that the Contractor must pay out-of-pocket for each BI submission, or are all federal processing costs borne by the Government?	The Government bears the cost of BI investigations.
9	Reference SOW Section 4. B: To ensure our Staffing Plan and 'Bench Model' remain viable, does the Government impose a maximum cap on the number of BI applications the Contractor can submit per month or have pending in the pipeline at any one time?	Contractor may retain a "pool" of prospective employees to cover any SOW staffing requirements. Any potential maximum cap can be addressed during the kick-off meeting after contract award.

10	Is there any incumbent/recompete or this is a brand-new project? If yes, could you please provide us with their award number or even if the customer bought similar services in the past.	CBP has procured similar services in the past. However, historical contract numbers will not be provided; prospective offerors shall formulate their proposals based upon all requirements as defined in the current solicitation.
11	For Volume I, please confirm whether resumes for key personnel are required and, if so, whether they count toward the 15-page limitation.	Resumes are not required. However, see Q&A #36 and #43 regarding this topic.
12	Please confirm whether Attachment 3 Pricing Schedule must be completed for every sector and every potential location, including locations that may not be immediately active at time of award.	Yes, solicitation Attachment 3 (Proposal Pricing Schedule) must be completed for every sector and every potential location, including locations that may not be immediately active at time of award.
13	Please confirm whether offerors should price only fully burdened labor rates in Attachment 3, or whether any separate assumptions for transition, surge, or other direct costs should also be reflected.	The fully burdened hourly rate reflected in solicitation Attachment 3 shall encompass all personnel and costs required to provide the caregiver or supervisor position availability on a 24/7/365 basis. There shall be no separate pricing submitted outside of solicitation Attachment 3.
14	For Volume II Past Performance, please confirm whether subcontractor past performance may be submitted and considered if a teamed approach is proposed.	Yes, subcontractor past performance may be submitted and will be considered.
15	Please confirm whether CPARS may be submitted in lieu of completed Past Performance Questionnaires, or only as supplemental information.	Yes, this is acceptable. Offerors shall submit relevant past performance information for projects similar in size/scope to this requirement for Federal, State, and local government, and private clients.
16	Please confirm the expected response time for staffing task orders and whether the Government anticipates any minimum mobilization period after task order issuance.	See answer #4 above.
17	Please clarify whether mixed-gender staffing is required at all times at each active location where more than one caregiver position is ordered, including all shifts.	The Contractor shall provide a mixed gender staff (Male/Female) of employees fulfilling the Caregiver position, at each active location as designated, when more than a single Caregiver position is required.
18	Please confirm whether Juvenile Priority Facility supervisor coverage must be continuously onsite 24/7, or whether certain periods may be covered through on-call supervision.	The Contractor shall provide for at least one Supervisor position at each active location as designated. The number of Caregiver positions shall be dependent on the requirements of each active location.
19	Please clarify whether the applicable wage determination attachment maps directly to caregiver and supervisor positions, or whether offerors are expected to make their own labor-category mapping.	CBP anticipates that contract performance involves applicable classes of services employees already included within the wage determinations provided. See RFO 52.222-41(c) for further details.
20	Please confirm whether there are any anticipated onboarding constraints or processing timelines beyond the background investigation requirements identified in the solicitation.	There are currently no anticipated onboarding constraints or processing timelines beyond the background investigation requirements.
21	Please advise whether the Government expects offerors to include a transition approach only at the IDIQ level, or also for individual task order activations.	The Transition Management Plan required by SOW Section 4.E. (Task #5) is applicable only at the IDIQ contract level.
22	Will CBP permit offerors to submit key personnel past performance in line with FAR 15.305(b)(iii)?	Pursuant to Revolutionary FAR Overhaul (RFO) 15.202(c)(3)(iii), past performance evaluations will consider any information regarding key personnel who have relevant experience when such information is relevant to this acquisition.
23	SOW section 10(b) refers to computer network access, but 4(C)(i)(8) states that no government furnished equipment or workstations will be provided to the Contractor. Does that statement refer to an inventory management system, or will there be no GFE provided? If there will be no GFE, is CBP's expectation that the Contractor will furnish all IT equipment necessary for its personnel to perform contract work, including maintaining shift logs, emailing Government personnel, etc.? If so, will CBP provide internet connectivity for Contractor IT?	If access to CBP systems is required, the appropriate GFE will be furnished.

24	Please confirm whether it is CBP's expectation that the Contractor will maintain a system to track documentation of rights electronically utilizing Contractor-provided IT (SOW C(iii)(19)?	In regards to section 4.C.iii.19, it will be at the Contractor's discretion whether the system will be electronically or hard copy, and made available to the COR upon request. No GFE will be provided for this requirement.
25	What is the current population of minors, by station?	Population frequently changes. The estimated annual position requirements for each sector listed within SOW section 8 should be used as the baseline 24/7 staffing requirement. These estimated number of positions also align with the number of positions indicated within solicitation Attachment 3 (Proposal Pricing Schedule).
26	Are the training materials in SOW 10(j) standard curricula maintained by CBP and, if so, is training delivered in person or via an online learning management system? Roughly how many hours do the mandatory trainings during orientation take personnel to complete?	Training material shall be provided by CBP for modification by Contractor to create targeted curricula specific to the responsibilities of each requirement. Training hours will be dependent upon Contractor-created training materials based on the provided curricula.
27	How frequently are orientation trainings provided, if on a regular schedule?	It is CBP's expectation that the Contractor will be responsible for orientation based on provided training material.
28	RFP Language: A completed copy of the SF-1449 (solicitation Attachment 1, pg. 1). Complete Blocks 17a, 17b (if applicable), 30a, 30b and 30c. Offerors must also provide their System for Award Management (SAM) Unique Entity Identification (UEI) number. At least one main business point of contact including name, email address, and phone number shall also be provided. Additionally, the vendor shall acknowledge all solicitation amendments issued. Question: Would the Government clarify if the above-mentioned will be considered a stand-alone Volume with no page limitation? If so, what would be the title of this volume (i.e., General or Administrative)?	The completion and submittal of the SF-1449 is separate from the requirements of Volumes I through III.
29	Would the Government allow a Title Page, a Table of Contents, and a List of Acronyms and Definitions to be excluded from page count for Volume I?	Yes, this is acceptable.
30	Please deconflict the requirement for mixed-gender staff for a designated Juvenile Priority Facility with only 1 Caregiver position allocated (e.g., El Centro Station) as 2.0 Scope of Work and 8.0 Place of Performance contradict each other (i.e., Scope states “always” and Place of Performance states “…when there is more than one (1) Caregiver position…”	For locations with only 1 estimated annual Caregiver position (i.e., El Centro Sector), the mixed gender staffing shall include the supervisor (for example: male caregiver with female supervisor). SOW sections 2 and 4.C.i.3 have been revised to clarify mixed-gender staffing requirements.
31	The Government states “The current list of Juvenile Priority Facilities (JPFs) is listed below in SOW Section 8. CBP may add or remove certain Juvenile Priority Facilities, as needed, through formal bilateral modification action.” Would the Government confirm that, should a surge be required within existing locations, the Government will allow bilateral modification action to increase staffing to meet temporary operational requirements?	Any increase in staffing (i.e., increase in the number of positions required by CBP) will either be accomplished through bilateral modification of existing task orders or through the issuance of a new task order.
32	SOW section 4.C.i.2 states the contractor shall utilize emergency movements of staff within a Sector as required. Question: For non-local directed or emergency staff movements, will the Government reimburse travel, lodging, and per diem costs, or should these costs be included within the firm-fixed unit pricing?	Any potential contractor costs as outlined in this question shall be incorporated into the fully burdened hourly rates reflected in solicitation Attachment 3. There shall be no separate pricing submitted outside of solicitation Attachment 3.
33	SOW section 4.C.i.1 states that Staffing is required at each “active location” as designated by the Government. Question: Would the Government clarify how an “active location” is defined and what advance notice will be provided prior to activation beyond the stated 48-hour movement requirement?	An "active location" is a location that requires caregiver and supervisor positions. CBP will provide as much advance notice as possible when issuing new task orders or directing position "reassignments". The Contractor will be given no less than 48-hours notification; in the event of extraordinary circumstances with regards to a geographical location move within a Sector, CBP understands that the movement of Caregivers may require additional time for which CBP will coordinate an acceptable schedule with the contractor at that time.

34	Are historical and anticipated quarantine/isolation pod(s) staffing already included in the sector-level Caregiver allocated positions within SOW section 8. Place of Performance? If not, will the required number of additional positions to properly meet this requirement be added to the authorized number of Caregiver positions with or without a bilateral contract modification?	Yes, these positions are already included/accounted for in the estimated total annual position requirements for all locations within each sector.
35	RFP p.44, Section II.10, Instructions, asks for Offerors to submit completed Past Performance Questionnaires (PPQs). To reduce administrative burden to essential Government personnel pending finalization of FY26 budgets, would the Government allow for previously completed and signed PPQs by Government clients within the last 24 months?	Yes.
36	In reference to RFP p.45, Section II.11(a)(1)(iii) evaluation of Factor 1, Element 1.3, Key Management Personnel, would the Government allow for resumes (not to exceed 2 pages in length) to be submitted outside of the 15-page volume restriction?	Yes, this is acceptable.
37	In reference to the SOW, p.18, Section 10.g, Key Personnel, the solicitation defines three Key Personnel positions. Within Attachment 3, Proposal Pricing Schedule, Offerors are asked only for the Supervisor and Caregiver rates. Would the Government clarify whether the Key Personnel are billable to this program and if so, what are the hours associated with each?	Key Personnel are not separately billable. Any and all contractor costs related to fulfilling SOW requirements shall be incorporated into the fully burdened caregiver and supervisor hourly rates reflected in solicitation Attachment 3. There shall be no separate pricing submitted outside of solicitation Attachment 3.
38	To reduce the administrative burden on Government references, will the Government accept finalized CPARS reports in lieu of requiring Past Performance Questionnaires (PPQs) for submitted reference contracts?	See answer #15 above.
39	To ensure offerors develop realistic transition and staffing schedules, can the Government provide the historical average processing times for CBP Background Investigations (BI) for Caregivers and Supervisors on this contract?	The timeline for completion of a background investigation varies widely depending on the history of the applicant and other available prior background information. While no specific timeline can be provided, offerors should anticipate the adjudication process to take no less than 120 days.
40	Will the Government grant clearance reciprocity for contractor personnel who currently hold active clearances on other DHS contracts? If so, can the Government provide an estimated timeframe for processing clearance reciprocity?	Candidates who possess favorably adjudicated T4 or T5 background investigations that meet federal investigation standards will be considered for “reciprocity” as applicable. No timeline can be provided for the processing of reciprocity requests.
41	Can the Government clarify if the "estimated annual positions" by sector are intended to establish a maximum ceiling, a minimum guaranteed requirement, or simply a baseline for evaluation purposes?	"Estimated annual positions" by sector reflect currently expected position requirements and will be used by CBP as a baseline for proposal evaluation purposes. See RFO 52.216-19 within solicitation Attachment 1 for contract order limitations.
42	Is there a defined, mandatory caregiver-to-juvenile ratio by facility type (e.g., Juvenile Priority Facilities vs. standard facilities)?	Any potential "ratio" requirements will be addressed by CBP through the issuance of task orders defining the exact number of positions required.
43	Please confirm that Key Personnel resumes and Letters of Commitment are exempt from the page limitations, provided offerors restrict resumes to a maximum of two pages per candidate.	Yes, this is acceptable.
44	Will the Government evaluate the past performance of Subcontractors as well as the prime?	Pursuant to RFO 15.202(c)(3)(iii), past performance evaluations will consider any information regarding subcontractors that will perform major or critical aspects of the requirement when such information is relevant to this acquisition.
45	Will CBP consider granting reciprocity for contractor employees who previously held a favorably adjudicated T4 or T5 suitability determination under a prior CBP caregiver services contract, provided the determination remains within the applicable reinvestigation period? If so, what is the process for submitting candidates for reciprocity consideration at or immediately following award?	Candidates who possess favorably adjudicated T4 or T5 background investigations that meet federal investigation standards will be considered for “reciprocity” as applicable. Per SOW section 5, CBP Background Investigation documentation shall be submitted within 5 days after contract award.

46	With respect to Element 1.1 (Staffing Plan), will the Government evaluate an offeror's approach to staffing sustainability under conditions of fluctuating task order volume, including the offeror's financial and operational capacity to maintain a pre-screened candidate pipeline during periods when task orders are reduced or temporarily suspended?	Yes, the prospective offeror's approach to staffing sustainability is part of this element (i.e., "how the prospective offeror shall recruit, screen, incentivize and retain personnel").
47	The SOW states that the Project/Program Manager shall have experience in a supervisory or leadership role within a childcare center, healthcare staffing agency, or related field. Will CBP consider federal law enforcement or border operations experience in managing UAC and juvenile detainee populations — including direct management of CBP-contracted childcare facilities — as satisfying the related field requirement for this position?	Yes, this is an acceptable "related" field.
48	Please confirm if the Government will provide PPE equipment. It is not listed under GFE provided.	At this time CBP OCMO does not forsee any requirement for use of PPE. Any future need will be discussed with Program Office, COR, CO and contractor for implementation via contract modification
49	For the inventory tracking system that the Offeror is required to develop and maintain, and for which no Government-Furnished Equipment (GFE) or workstation will be provided, please confirm whether the Offeror will be responsible for supplying all necessary computer equipment should the system be electronic.	If the Contractor decides to implement an electronic tracking system, it will be the onus of the Contractor to provide any required equipment to create and maintain said tracking system. Any changes to this requirement shall be implemented via contract modification.
50	For the tracking system used to document that rights have been communicated, and for which no Government-Furnished Equipment (GFE) will be provided, please confirm whether the Offeror will be responsible for supplying all necessary computer equipment should the system be electronic.	See answer #49 above.
51	For the data entry required to support the metrics identified in this section, please confirm whether the Offeror will be responsible for providing its own equipment for this requirement; paper if via paper or computer equipment should the data entry be by electronic means.	See answer #49 above.
52	In reference to RFO 52.223-23, SUSTAINABLE PRODUCTS AND SERVICES (OCT 2025) (DEVIATION 26-12) (effective November 28, 2025): The clause indicates that applicable sustainable products and services, including the purchasing program and product or service types, and any exclusions, will be delineated in the Statement of Work (SOW) or other sections of the contract. Please identify the applicable sections that addresses this, or confirm that the clause should be removed if it does not apply to this procurement.	The Government has not identified at this time any sustainable products that are required during the performance of this contract. However, pursuant to the clause prescription, the clause will remain incorporated within the contract. Coordination between the Contractor and Government will be made after award to further identify any sustainable products and services as necessary.
53	This solicitation references processes for both suitability and processes for clearances & classified information. 1. confirm if this program is/is not a classified program? 2. What is the position sensitivity designation for this program?	This contract is unclassified. The position sensitivity designation is anticipated to be T4 - High Risk.
54	Will the Government please clarify the intended meaning of "# of Positions" in Column C of Attachment 3, as well as the Sector descriptions identified in the Statement of Work (SOW)? Additionally, please consider adding a column in Attachment 3 that allows Offerors to input their estimated productive full-time equivalents (FTEs) to assist evaluators in better understanding each Offeror's proposed workforce approach against the estimated hours provided in the RFP.	The "# of Positions" in Column C of solicitation Attachment 3 are the estimated annual position requirements for each sector listed within SOW section 8. "Estimated annual positions" by sector reflect currently expected position requirements and will be used by CBP as a baseline for proposal evaluation purposes. Solicitation Attachment 3 will not be revised to add an additional column; an offeror's workforce approach/staffing plan shall be submitted as part of Volume I – Technical and Management Approach.
55	What are the immunization requirements for caregivers?	No requirements for caregivers.

56	The link to the DHS Information Security Policy, identified in MD 4300.1 is not functional. Will CBP provide a link to the referenced document?	https://www.dhs.gov/sites/default/files/2023-05/V2.508%20Working%20file_DHS_4300A%20ITSSP%20SS%20Policy%20Directive%20FINAL%202023.02.13_kwb.pdf
57	The PPQ states 'To: Contracting Officer at government agency or commercial organization with knowledge of contractor's past performance.' As Government Contracting Officers move and change programs over time, confirm offerors may send PPQ to the CO or another government representative with direct knowledge of the offeror's performance on the program?	Yes, this is acceptable.
58	Confirm offerors are to submit a past performance narrative (in addition to requesting completion of PPQs) addresing the requirement "Offerors shall also submit relevant past performance information for projects similar in size/scope to this requirement for Federal, State, and local government, and private clients." Please provide page limit for Past Performance narrative.	Yes, offerors shall submit both relevant past performance information for projects similar in size/scope to this requirement as well as requesting that a maximum of three (3) references complete Solicitation Attachment 4 (Past Performance Questionnaire). There is no page limit for the "narrative" portion of the submittal.
59	The Pricing Schedule lists estimated position quantities per sector. Are these guaranteed minimums for task order issuance, or purely illustrative estimates with the only binding minimum being the $15,000 contract minimum stated in clause I.39?	The "# of Positions" in Column C of solicitation Attachment 3 are the estimated annual position requirements for each sector listed within SOW section 8. "Estimated annual positions" by sector reflect currently expected position requirements and will be used by CBP as a baseline for proposal evaluation purposes. Clause I.39, (RFO) 52.216-19, is indeed the correct clause reflecting order limitations.
60	Are training costs (TEDS, Flores, PREA, Trauma-Informed Recognition) expected to be embedded in the fully burdened hourly labor rate, or will there be a separate CLIN or cost reimbursement mechanism for onboarding and recurring training expenses?	See answer #5 above.
61	Contractor is responsible for paying the Government for PIV card replacements. Is there a government-established replacement cost per card that offerors should use for pricing purposes, or should offerors estimate based on current GSA/DHS pricing?	CBP does not anticipate any cost for replacement PIV cards at this time.
62	Should pricing be provided for all five ordering periods in Attachment 3? Will SCA wage determination adjustments per FAR 52.222-43 be applied at each ordering period anniversary, or must offerors lock rates across all five years?	Pricing must be provided for all 5 ordering periods outlined in solicitation Attachment 3. RFO 52.222-43 is applicable to this contract and will be applied as appropriate.
63	The SOW requires full transition within 30 days of NTP, but CBP BI processing can take up to 90 days. Will CBP allow awardee personnel to operate under a temporary suitability determination or escorted access while full BIs are pending during the transition window? If so, what are the specific conditions and limitations?	See answer #7 above.
64	Will CBP facilitate reciprocity for awardee personnel who currently hold favorably adjudicated T4/T5 investigations from other DHS or federal contracts? If so, what is the expected processing timeline for reciprocity determinations via CBP Form 78 (BIRD)?	See answers #40 and #45 above.
65	The first ordering period is stated as September 1, 2026. What is the Government's current anticipated award date, and how many weeks between contract award and September 1 should offerors plan for BI pipeline development in their Staffing Plan and Transition Management Plan?	The current anticipated award date for this requirement is late July or August 2026. See answer #4 above as well as multiple answers above regarding background investigations/timeline for staffing/transition management plan formulation purposes.
66	Will the incumbent contractor be required to provide a roster of currently cleared personnel to support awardee transition planning? Will CBP facilitate direct coordination between the outgoing and incoming contractors during the transition window?	Yes; in the event that the incumbent is not awarded the new contract, the incumbent - with assistance from CBP - shall provide all necessary effort and assistance to the new Contractor in supporting the Transition In to the incoming contractor / Out from the outgoing contractor. The incumbent shall also provide all necessary guidance and instruction to the new Contractor on processes of all functions to ensure restoration of all services in this transition.

67	The SOW requires mixed-gender staffing whenever more than one Caregiver position is active at a location. If a location activates with a single-position task order, is a sole male or sole female Caregiver compliant, or must the contractor still provide mixed-gender coverage at single-position locations?	See answer #30 above.
68	The SOW specifies 48-hour notification for intra-sector movement of Caregivers between active locations. What is the expected notification timeline for initial task order issuance activating a location from zero to fully operational? Is there a standard lead time offerors should plan for in their surge response protocols?	See answer #33 above.
69	Each sector listing includes 'Temporary soft-sided structures as may later be designated.' Are these structures included within the estimated position counts in Section 8, or should offerors treat them as potential surge locations outside the base position estimates when developing their Staffing Plan?	Temporary soft-sided structures as may later be designated' should be treated as potential surge locations outside the base position estimates when developing the Staffing Plan.
70	The solicitation requires past performance similar in size and scope. What is the Government's threshold for relevance? Specifically, will a contract for 24/7 staffing of direct-care workers under a DHS, HHS, or international humanitarian operations context be considered analogous to NAICS 624410 child caregiver services, even if the NAICS code on the referenced contract differs?	Offerors shall provide clear and concise documentation/metrics supporting that the prior contract being used for past performance purposes is similar in size and scope. A contract can be considered similar in size and scope even if the NAICS code differs.
71	The PPQ submission deadline for references is April 30, 2026 — concurrent with the proposal deadline. If a reference submits a completed PPQ after the proposal deadline but prior to award, will the Government consider it as part of the past performance evaluation?	See paragraph (c) of clause II.9 {52.212-1 INSTRUCTIONS TO OFFERORS—COMMERCIAL PRODUCTS AND COMMERCIAL SERVICES (AUG 2025) (DEVIATION 25-21) (effective November 28, 2025)}
72	Clause I.45(k) prohibits non-U.S. citizens from accessing or assisting in the development, operation, management, or maintenance of DHS IT systems without a Head of Component waiver. Does this prohibition extend to Caregiver or Supervisor positions performing non-IT functions on-site at CBP facilities, or is it limited strictly to personnel with access to DHS information technology systems?	Paragraph (K) of HSAR 3052.240-71 CONTRACTOR EMPLOYEE ACCESS (JUL 2023), ALTERNATE I (JUL 2023) (effective November 3, 2025) applies to Non-U.S. citizens who require "access or assist in the development, operation, management, or maintenance of Department IT systems under the contract".
73	FAR 52.229-11 requires foreign persons to submit IRS Form W-14. If an offeror's parent company is foreign-owned but the contracting entity is a U.S.-incorporated subsidiary with a separate UEI and CAGE code, does CBP consider the offeror a 'foreign person' for purposes of this provision and the associated 2% withholding requirement?	Offerors shall consult their own legal counsel and/or tax advisor for the proper completion of RFO 52.229-11.
74	Factor 1 (Technical and Management Approach) contains three elements: Element 1.1 (Staffing Plan), Element 1.2 (SOW Compliance), and Element 1.3 (Key Personnel). Are these elements evaluated with equal weight within Factor 1, or does Element 1.1 (Staffing Plan) carry greater importance, as the SOW language suggests it is the 'key element' of the proposal?	The elements listed within Factor 1 are not weighted; these elements will be used to determine one overall rating for Factor 1 (i.e., the contractor-provided approach formulated to meet the requirements of the SOW).
75	Will the Government accept and evaluate past performance citations from proposed subcontractors, flowing up to the prime offeror's evaluation? If so, will subcontractor past performance carry the same evaluative weight as prime contractor past performance under Factor 2?	Yes and yes.