United States Department of Agriculture
Determination and Findings (D&F)
Authority to Consolidate Contract Requirements
Solicitation Number: 12314426Q0100

This D&F is prepared in accordance with Federal Acquisition Regulation (FAR) 7.107-2 (a) to support a consolidated acquisition over $2M.

FINDINGS

1. Mission Area and Contracting Activity.

   Requesting Activity Agency: FPAC

   Contracting Activity: OCP-POD

2. Acquisition Information:

Solicitation/Contract/Order Number	12314426Q0100
Period of Performance	07/01/2026-06/30/2031
Estimated Total Amount	$44,065,708.98

3. Description of the Requirement: The requirement consolidates the ongoing requirement for AWS cloud operational support services that currently sustain approximately 400 business applications. Historically, the network services were fulfilled using four separate contracts. These contracts contained overlapping and related requirements. Market research determines that the consolidation of these commercially available services would result in significant cost savings, reducing administrative burden, and improved mission support.

   The proposed consolidation includes the following scope of work:

Contractor	Contract Number	Base Year Value	Base Year + 4 Option Periods	Business Size
Tista Science & Technology (Fig)	12314422F0363	$8,003,038.98	$62,741,538.98	Large
AT-Impact LLC (Cypress)	12314422F0720	$7,355,821.05	$52,353,567.94	Large
Alpha Omega Integration LLC (Rowan)	12314422F0596	$3,222,720.16	$25,414,090.35	Large
Centennial Technologies	12314423F0695	$2,660,496.00	$10,195,509.60	Small, 8a, Hubzone
		$21,242,076.19	$160,877,095.17	

4. Selection of Acquisition Strategy

   a. Market Research Summary: Market research included a review of multiple federal and USDA acquisition channels, including the GSA Polaris Governmentwide Acquisition Contract (GWAC), the USDA Sustainment Operations of Applications Blanket Purchase Agreement (BPA), the USDA STRATUS Pool 2 Basic Ordering Agreement (BOA)

vendors, and the NIH Information Technology Acquisition and Assessment Center (NITAAC). STRATUS Pool 2 includes a broad base of qualified vendors, with 21 small and 15 other-than-small businesses responding, demonstrating robust competition consistent with USDA cloud procurement policy requirements. USDA Departmental Regulation DR-3650-001 requires mandatory consideration of STRATUS cloud acquisition vehicles. The STRATUS program is further characterized as a preferred and modernized cloud acquisition platform designed to support federal agencies with scalable cloud solutions, per USDA cloud policy and vendor program descriptions. STRATUS's competitive structure and wide vendor base are documented benefits, including rapid access to cloud capabilities and maximized contractor competition. Compared with other acquisition pathways reviewed, specifically GSA POLARIS, USDA's Sustainment Operations of Applications BPA, and NITAAC, the STRATUS BOA offers the most targeted alignment with USDA's cloud governance framework, providing cost optimization, streamlined ordering, and defined compliance with USDA IT policy. STRATUS is consistently identified as the preferred next-in-priority solution when internal BPA options either do not apply or do not provide equivalent technical breadth or capacity. Given the documented vendor diversity within STRATUS Pools, especially Pool 2, which includes dozens of awardees across the small business track as demonstrated in publicly posted award information, this acquisition vehicle ensures ample competitive opportunity for small businesses, aligning with USDA small-business utilization goals. Based on these findings, the contracting officer can be assured that utilizing STRATUS will provide a highly competitive environment with meaningful small business participation and represents the most efficient and policy-aligned acquisition strategy for this requirement.

b. Alternative Contracting Approaches: If the projected efficiencies and cost savings are not realized, the USDA could transition to individual contracts to cover the requirement. This alternative may be less advantageous as it results in increased administrative burden, firewall and network security risks, higher costs and reduced efficiency.

c. Coordination: The determination has been coordinated with the Office of Small Disadvantaged Business Utilization Office.

d. Impact on Small Business: This acquisition will be set aside for small businesses, ensuring continued opportunities for small business participation, mitigating the risk that consolidation could otherwise concentrate work among larger contractors. The USDA has taken significant steps to ensure minimal disruption to small businesses while achieving substantial cost savings through consolidation. This approach balances the need for efficiency with the commitment to supporting small businesses. By leveraging the STRATUS Pool 2 small business track, the USDA creates a competitive environment that encourages innovation and cost-effectiveness among participating vendors. This strategy underscores the importance of a collaborative relationship between the government and small businesses, fostering growth and maintaining high-quality service delivery.

5. Benefits of Consolidations
   a. The consolidation was justified in accordance with FAR 7.107-1 and FAR 7.107-2. By consolidating these requirements, the Government anticipates projected efficiencies. Consolidation reduces duplicative efforts, eliminates technical debt, strengthens security, and ensures consistent best-practice implementation across all Mission Areas. The approach improves management efficiency, operational reliability, and accountability by using a single contractor coordination framework.

      Pricing will be firm-fixed price under a level-of-effort task order structure. Labor categories and planned staffing levels (e.g., 1,920 hours per FTE per year) are used to assess the technical approach; however, invoicing will be based solely on fixed monthly CLIN prices, which represent the agreed-upon level of effort and defined outcomes. Payments will not be tied to hours expended but to the contractor's delivery of the specified effort, outcomes, and service levels.

   b. Cost Savings or Price Reductions:

IGCE for Proposed Consolidated Effort

Base 07/01/2026-06/30/2027:	$8,300,560.00
OP1 07/01/2027-06/30/2028:	$8,549,276.80
OP2 07/01/2028-06/30/2029:	$8,805,455.10
OP3 07/01/2029-06/30/2030:	$9,069,318.76
OP4 07/01/2030-06/30/2031:	$9,341,098.32
Base + 4 OPs:	$44,065,708.98

Historical Pricing (Annual Total Four Contracts):

Base	$21,242,076.19
OP1	$37,082,594.08
OP2	$36,295,793.73
OP3	$27,605,111.41
OP4	$12,827,620.22
Base + 4Ops	$160,877,095.17

The costs across all four contracts were compared to the consolidated effort IGCE of $44,065,708.98 for a base plus four option periods resulting in a total quantifiable savings of $116,811,386.19 (72.6%).

The IGCE was developed using historical pricing and General Services Administration (GSA) labor rates mapped to the requirement outlined in the consolidated Performance Work Statement (PWS).

6. Quality Improvements that will save time or enhance performance or efficiency: A single consolidated procurement reduces workload and administrative duplication compared to four separate contracts. A single procurement cycle produces a single

award structure and standardized tasking framework, reducing future ordering lead time.

7. Reduction in acquisition lead time: A single consolidate procurement aligns the period of performance and offers an opportunity to use an established basic BOA with defined compliance with USDA IT policy, standardized tasking framework and reduced future ordering lead time.

8. Terms and Conditions: Consolidation allows USDA to apply a single, consistent set of security, SLAs, governance, and reporting requirements across all 400 applications, aligning with enterprise needs. Reduced variance in contractor performance with a single prime to meet consistent obligations rather than different vendors operating under different clauses

9. Other Benefits: Consolidation improves mission support by removing duplication and strengthening operational continuity. By consolidating under an acquisition vehicle that maintains competitive vendor pools the USDA ensures multiple small businesses can propose and participate. One contract requires one set of reviews, COR oversight structures, performance tracking, and reporting cycles rather than four.

10. The total benefits quantified in dollar amounts are: a savings of $106,638,997.89 for the aggregate contract value.

11. Substantial Financial Benefit Determination

☒ The estimated value of the contract is $94 million or less and the anticipated financial benefits are equivalent to 10% or more of the total contract value, including options.

☐ The estimated value of the contract, including all options, exceeds $94 million, and the anticipated financial benefits are the greater of either 5% of the estimated contract value or $9.4 million.

☐ The financial benefits do not meet the thresholds in FAR7.107-3(d). However, they are critical to the agency's mission success.

12. The draft notification to the public required in FAR 7.107-3 (b) is attached for review and approval. The Contracting Officer will post the approved notification to the Government Point of Entry no less than seven (7) days after approval of this D&F. All other required notifications in FAR 7.103-3 will be issued within the required timelines and no solicitation will be issued until the approved timeframe after required notifications.

DETERMINATION

Based on the above facts, I determine that in accordance with FAR 7.107-2 consolidation of the above referenced requirements provides measurably substantial benefits and is necessary and justified.

Submitted by:

Mary Woodin
Contracting Officer

Reviewed by:

1. The required review has been completed. Resulting comments, if any, have been satisfactorily addressed. The package may be forwarded to the Branch Chief/Procurement Analyst for further review.

RYAN SCRIVNER Digitally signed by RYAN SCRIVNER Date: 2026.05.06 10:11:03 -06'00'

Ryan Scrivner
Level Above Contracting Officer

2. The required review has been completed. Resulting comments, if any, have been satisfactorily addressed. The package may be forwarded to the Chief of the Contracting Office (COCO) for further review.

VICTORIA BACA Digitally signed by VICTORIA BACA Date: 2026.05.07 15:54:21 -06'00'

Victoria Baca
Deputy Chief

3. The required review has been completed. Resulting comments, if any, have been satisfactorily addressed. The package may be forwarded to the Head of the Contracting Activity (HCA) for further review.

JOSHUA TAFOYA Digitally signed by JOSHUA TAFOYA Date: 2026.05.07 15:56:30 -06'00'

Joshua Tafoya
COCO

4. The required review has been completed. Resulting comments, if any, have been satisfactorily addressed. The package may be forwarded to the Senior Procurement Executive (SPE) for further review and approval.

CRAIG HARPER Digitally signed by CRAIG HARPER Date: 2026.06.22 07:57:13 -05'00'

Craig Harper
Head of Contracting Activity (HCA) (acting)

Approved by:

HILARY ERICKSON Digitally signed by HILARY ERICKSON Date: 2026.06.22 08:24:21 -05'00'

Hilary Erickson
Senior Procurement Executive