NATIONAL AERONAUTICS AND SPACE ADMINISTRATION
Langley Research Center (LaRC)
JUSTIFICATION FOR OTHER THAN FULL AND OPEN COMPETITION (JOFOC)
for Center Maintenance, Operations, and Engineering Contract NNL13AA14C

1. **Federal Acquisition Regulation (FAR) 6.104-1(a)(1) – Identification of the agency and the contracting activity, and specific identification of the document as a "Justification for other than full and open competition."**

   This document is a justification for other than full and open competition (JOFOC) prepared by National Aeronautics and Space Administration (NASA) Langley Research Center (LaRC).

   The procuring agency is NASA, and the contracting activity is LaRC.

2. **FAR 6.104-1(a)(2) – The nature and/or description of the action being approved:**

   This justification provides the rationale for contracting by other than full and open competition to award an extension to the Center Maintenance, Operations, and Engineering (CMOE) contract number NNL13AA14C for an additional two months, extending the period of performance (PoP) end date to September 30, 2026.

   The current CMOE period of performance is February 1, 2014 through July 31, 2026, inclusive of a 6-month extension previously exercised pursuant to Option to Extend Services (FAR 52.217-8) and previously approved JOFOCs for up to an additional twelve months. It is necessary for LaRC to extend the period of performance during the phase-in period of CMOE II which occurs from July 1, 2026 through September 30, 2026 and to align with anticipated effective date of October 1, 2026 as CMOE II will absorb critical ongoing work currently performed under CMOE. In addition, the two-month extension will allow Amentum to establish its new Business Systems (i.e., accounting, timecard, and contract management) and coordinate/test synchronization of multiple systems since CMOE contract was awarded using Jacobs' Business Systems and CMOE II contract has been awarded using Amentum's Business Systems as a result of its corporate reorganization.

   LaRC does not believe it is reasonable, nor cost effective, to conduct another Source Evaluation Board (SEB) separate from the ongoing CMOE II procurement to issue a new contract for the existing CMOE requirements. Therefore, LaRC is issuing this JOFOC to extend the current contract to cover the gap in services from August 1, 2026 until the effective date of October 1, 2026 for the CMOE II contract occurs and will serve to reduce the administrative burdens of submitting another JOFOC if unforeseen delays arise. Additionally, market research conducted by the LaRC CMOE II Requirements Development Team (RDT) and CMOE II SEB concluded there is no other existing enterprise contract with

the specialized contractor expertise to accomplish the CMOE work. This is even further evident by other NASA Centers requesting end-of-year support through CMOE.

3. **FAR 6.104-1(a)(3) – A description of the supplies or services required, to meet the Agency's needs (including the estimated value):**

The CMOE contract was initially a single-award cost-plus-award-fee (CPAF) contract with a base/core and an Indefinite-Delivery Indefinite-Quantity (IDIQ) component to issue CPAF, cost-plus-fixed fee (CPFF) or firm fixed price (FFP) task orders (TOs) with Jacobs Technology, Inc. (Jacobs). On September 27, 2024 Jacobs experienced a corporate reorganization and is now known as Amentum Technology, Inc. (Amentum). Pursuant to FAR clause 52.243-2, both parties agreed on a decision to modify the CMOE contract from CPAF to cost-plus-fixed-fee (CPFF) for Option Year 9 (starting October 1, 2023) and any contract extensions until the start of the subject contract's follow-on contract (CMOE II). The current maximum contract value is $1.017B with a PoP end date of July 31, 2026. The CMOE contract provides core support services in the areas of research operations, maintenance, and engineering. These technical services include:

- Research facilities operations for highly specialized wind tunnels, laboratories, test stands, instrumentation calibration/repair;
- Central utilities operations (e.g., steam, compressed air, electrical power distribution, potable water);
- Technology development and administration for Facility Automation Systems (FAS) and Data Acquisition Systems (DAS);
- Research and institutional facility maintenance including preventive maintenance, trouble calls, Reliability Centered Maintenance (RCM), and Integrated Operations Center (IOC) maintenance; and
- Facility engineering (e.g., design, construction, configuration management, tactical engineering, pressure system recertification, project management/planning support).

The value of the additional 2-month PoP is approximately $34M, increasing the contract value from $1.017B to $1.051B; consisting of $2M for the 2-month extension through September 30, 2026. Also, $32M is included to cover any additional IDIQ task orders necessary to meet NASA's mission. Upon approval of the JOFOC, a contract modification will be executed to extend the contract as described in this paragraph.

The proposed extension will allow CMOE to continue providing these specialized support services supporting vital NASA missions until the work can be transitioned to CMOE II.

4. **FAR 6.104-1(a)(4) – An identification of the statutory authority permitting other than full and open competition:**

The statutory authority permitting other than full and open competition is 10 U.S.C. 3204(a)(1), as implemented by FAR 6.302-1, Only one responsible source and no other supplies or services will satisfy agency requirements.

5. **<u>FAR 6.104-1(a)(5) – A demonstration that the proposed contractor's unique qualifications or the nature of the acquisition requires use of the authority cited:</u>**

The rationale supporting the use of 10 U.S.C. 3204(c)(1) is that the services needed are available only from one responsible source and no other type of service will satisfy the needs of the Agency as described below.

In accordance with FAR 6.302-1(a)(2)(iii), services may be deemed to be available from only the original source in the case of follow-on contracts for the continued provision of highly specialized services when it is likely that award to any other source would result in substantial duplication of cost to the Government that is not expected to be recovered through competition or unacceptable delays in fulfilling the Agency's requirements.

In considering the diverse and specialized requirements as described in paragraph 3 above, the CMOE prime contractor, Amentum, is the only contractor that can provide uninterrupted services without substantial duplication of effort or costs that would otherwise be incurred if NASA LaRC were to attempt to procure a brand-new contract for these services. The two additional months will also allow ample time to comply and execute the Agency's Procurement Directive decisions involving the efforts under CMOE II contract moving forward. The cost of competing, awarding, and administering a brand-new bridge contract would create a substantial duplication of cost to the Government that is not expected to be recovered through competition.

Not being able to extend the CMOE contract up to additional two months will result in a lapse of services between the CMOE contract which ends on July 31, 2026 and CMOE II contract which begins on October 1, 2026. Failure to approve this 2-month extension would severely impact NASA LaRC's capability to maintain highly specialized laboratory, test, and research operations that are crucial for mission support, space flight milestones, flight hardware assembly, and test analysis for NASA and its partners. In addition, not being able to extend will result in contract uncertainty. This uncertainty provides high risks with the retention of high-quality workforce under the CMOE contract. It is difficult for the contractor to hire new applicants since potential candidates may be hesitant to accept a position that appears temporary or unstable, especially if there is a lapse in contract performance between the two contracts. The workers that are qualified for work in NASA Langley's state-of-the-art wind tunnels often prioritize long-term job security. A role tied to contract uncertainty may deter interest by new hires and may prompt incumbent workforce to proactively seek more stable opportunities elsewhere. Replacing skilled workers is expensive, both in terms of hiring costs and loss of institutional knowledge. These risks could be mitigated with an extension that ensures continuity of services and will allow the Government to proactively plan for more complex tasks that support the Agency's mission which are currently sidelined due to the soon-ending contract.

Further, transitioning specialized research operations and institutional facility-related maintenance and engineering support services in an ad-hoc manner and shortened period with potential lapse in service would be highly disruptive to current mission workflows. The CMOE contract supports the following LaRC organizations: Center Operations Directorate

(COD), Research Directorate (RD), Engineering Directorate (ED), Science Directorate (SD), Safety and Mission Assurance Officer (SMAO), and Research Services Directorate (RSD), along with other NASA Centers and government agencies. Without a contract extension, the consequences would result in capability gaps and major impacts to LaRC infrastructure and its unique research facilities including:

- LaRC is home to several wind tunnels and aeroscience facilities, including the National Transonic Facility (NTF), Transonic Dynamics Tunnel (TDT), 8-Foot-High Temperature Tunnel (HTT), 14-by 22-Foot Subsonic Tunnel and the Langley Aerothermodynamics Laboratory (LAL). These facilities have a rich history of significant design contributions for many commercial transports, launch vehicles, military aircraft, and spacecraft. They also play a critical role in the development of future aircraft, the Orion Crew Exploration Vehicle, and advanced subsonic, supersonic, and hypersonic vehicles.
- City Environment for Range Testing of Autonomous Integrated Navigation (CERTAIN) is an FAA-approved urban environment drone test range that allows researchers to reduce the risk of integrating unmanned aircraft systems into our national airspace.
- The Air Traffic Operations Laboratory (ATOL) is used to test technologies to help improve air traffic management.
- Scientific missions that collect data on Earth's atmosphere and answer vital questions about our planet are facilitated through the Aerospace Flight Hardware Assembly and Integration facility, as well as the Flight Research Facility.
- The Measurement Systems Laboratory, Building-2104, provides a 175,000-square-feet of world-class facility for research and development (R&D) of new measurement concepts, technologies, and systems. It houses 40 modular labs, including a state-of-the-art laser/lidar and electromagnetics lab.
- The Katherine G. Johnson Computational Research Facility, Building-2103, improves data center efficiency and effectiveness by consolidating data centers, server rooms, and personnel into a 40,000-square-foot building.

In addition, the CMOE contract employs a highly specialized workforce that has unique knowledge of LaRC's research facilities. Due to the age of the facilities, this specialized knowledge is essential for maintenance and particularly when complex repairs are necessary.

The CMOE II SEB has recently implemented a corrective action plan, which NASA initiated resolving the General Accountability Office protest received associated with the contract award. The CMOE II SEB also has reviewed the offerors' revised proposals in response to the Amendment 00006 that NASA LaRC issued on January 30, 2025 associated with CMOE II Solicitation 80LARC23R0001, which removed the evaluation sub-factor MGMT 3 - Approach to Advance Diversity, Equity, Inclusion, and Accessibility (DEIA), Exhibit O - DEIA Plan, and the related Exhibit B – Data Requirements Document (DRD) C.29 because of the Executive Order (E.O.) titled, "Initial Rescissions of Harmful Executive Orders and Actions", which repeals Executive Order 14035, Diversity, Equity, Inclusion and Accessibility in the Federal Workforce" that was signed by the President of the United States of America on January 20, 2025. Based on CMOE II SEB's corrective action plan and review of the offerors' revised proposal, the CMOE II SEB presented their assessment to the CMOE II Source Selection Authority (SSA) which resulted in the SSA selecting Amentum

for contract award on April 11, 2026. On April 28, 2026 the Contracting Officer notified all offerors the SSA's decision. No protest was filed, and Amentum was officially awarded the CMOE II contract with a 90-day phase-in period starting July 1, 2026 and effective date of October 1, 2026.

6. **FAR 6.104-1(a)(6) – A description of the efforts made to ensure that offers are solicited from as many potential sources as practicable, including whether a notice was or will be publicized as required by Subpart 5.1 and, if not, which exception under 5.101 applies:**

   A notice to the Government Point of Entry (GPE) website (SAM.gov) will be published in accordance with FAR Subpart 5.2. This posting will inform potential sources of NASA's intent to award a sole-source extension to Amentum.

7. **FAR 6.104-1(a)(7) – A determination by the contracting officer that the anticipated cost to the Government will be fair and reasonable:**

   The Contracting Officer's signature on this document indicates that the Contracting Officer has determined that the anticipated cost to the Government will be fair and reasonable. Each contract year, the Contractor submits an Annual Service Plan proposal that is based on O&M requirements (core support services) for each fiscal year starting on October 1st for LaRC. In addition, Amentum submits proposals for all IDIQ tasks. Price and cost analyses, as appropriate, and negotiations will be performed on each proposal to ensure the final agreed-to price for each contract action is fair and reasonable. In addition, LaRC will leverage cost data available from the prior ten years of performance under the CMOE contract to support the Contractor's cost and pricing for both core support services and IDIQ tasks.

8. **FAR 6.104-1(a)(8) – Description of the market research conducted, and the results, or a statement of the reasons market research was not conducted (e.g., urgent, and compelling requirement):**

   NASA recognizes that market research would produce offerors capable of providing the necessary research operations, maintenance, and engineering support services. However, as discussed in detail in paragraph 5, it is not practical, feasible, or cost effective to conduct a competition at this time to onboard a brand-new contractor, and satisfactorily ensure performance of a bridge contract for two months without great risk of disruption or degradation of the mission. The costs and disruptions are greatly exacerbated since the new CMOE II contract will absorb these requirements pursuant to the CMOE II procurement strategy. Additionally, extensive market research was conducted by the LaRC CMOE II RDT and it determined that none of the existing or forecasted General Services Administration (GSA) schedule offerings or the contracts listed on the Acquisition Gateway are suitable to fulfill the requirements of the CMOE because a portion of the agency's requirements fall outside the scope of the existing Best-in-Class (BIC) or other Government-wide contracts. In addition, the CMOE contract provides LaRC the ability to demonstrate that highly specialized operational, laboratory, test and research facilities support critical mission operations, mission objectives and milestones such as space flight, flight hardware assembly and test analysis in support of NASA and partner missions. Given the specialized scope,

mission urgency, and the need for tight integration of critical utility infrastructure, test equipment, industrial control systems, and building automation systems with NASA-managed systems, retaining the contract and contract administration within NASA ensures continuity, technical oversight, and cost efficiency. Transitioning the contract and contract administration to another government agency (i.e., GSA) would introduce delays, increase coordination complexity, and risk misalignment with critical milestones tied to numerous wind tunnel tests and mission support of the administration's objectives.

9. **FAR 6.104-1(a)(9) – Any other facts supporting the use of other than full and open competition:**

   None. The requirements of FAR 6.303-2(b)(9)(iii) are detailed in paragraph 5 above.

10. **FAR 6.104-1(a)(10) – A listing of the sources, if any, that expressed an interest in writing in the acquisition:**

    A notice of NASA's intent to award this sole-source action will be synopsized on the GPE website (SAM.gov), per FAR Subpart 5.2 (see Section 6 above). The synopsis will provide instructions for how interested organizations can submit their capabilities and qualifications to perform the required effort. The synopsis will be posted in accordance with FAR Subpart 5.2. The synopsis notice of intent will not be a request for competitive proposals, nor a determination by the Government not to compete the subject procurement action on a full and open competition basis, will be solely within the discretion of the Government.

11. **FAR 6.104-1(a)(11) – A statement of actions, if any, the agency may take to remove or overcome any barriers to competition before any subsequent acquisition for the supplies or services required:**

    Following the transition of the work being conducted under CMOE to the CMOE II contract, NASA will continue to examine the market in the future for alternative solutions or new sources before executing any subsequent acquisitions for the same requirements.

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SIGNATURE PAGE

Technical Representative: I certify that the facts presented in this justification are accurate and complete.

Timothy Hall Digitally signed by Timothy Hall
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Timothy J. Hall
Technical Representative

Contracting Officer: I hereby certify that the above justification is accurate and complete to the best of my knowledge and belief.

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Daphne G. Darden
Contracting Officer

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APPROVAL:

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