[redacted]

JUSTIFICATION FOR AN EXCEPTION TO FAIR OPPORTUNITY
Instructional Development and Delivery

1. **Agency and contracting activity:**
The Defense Counterintelligence and Security Agency (DCSA), Procurement Solutions (PRS) Directorate, is the procuring activity for this action. The PRS Directorate proposes to enter into a contract action for one-month on a basis of other than full and open competition for Instructional Development and Delivery (IDD) support services.

2. **Description of Action:**
This action is to modify the existing IDD task order HS002124FE006 by exercising the Option to Extend Services clauses (Revolutionary Federal Acquisition Regulation (FAR) Overhaul (RFO) 52.217-8) for a period of one-month. The clause was included in the task order but pricing for the option was not evaluated prior to award. As a result, the exercise of this option legally constitutes a new, out-of-scope procurement requiring this justification. This modification will be funded with [redacted].

3. **Description of Supplies/Services:**
The contractor shall provide broad range of IDD training products and support services for the Security Training Directorate (ST), and the Entity Vetting Division within the Industrial Security Directorate (IS EVD), to ensure the preparedness and readiness of the security workforce in a continuously changing security environment. The purpose of this requirement is for the analysis, design, development, implementation, evaluation (ADDIE), and maintenance of security related training products and to provide support services in IDD, which includes Instructional Systems Design, Security Discipline, SMEs/Instructors, Editing/Writing, Website Development and Programming, Courseware Development and Programming, and Technical Quality Assurance. The DCSA intends to issue a one-month extension pursuant to RFO FAR 52.217-8 (15 June through 14 July 2026) in the amount of [redacted] to the incumbent contractor, Team Carney, Inc., on a sole-source basis to prevent a lapse in mission-critical IDD services while finalizing award of a competitively solicited follow-on task order.

4. **Exception to Fair Opportunity Authority and Supporting Rationale:**
The statutory authority which permits not providing each awardee a fair opportunity to be considered for each order exceeding the micro-purchase issued under a multiple award contract is 41 U.S.C. 4106(c) as implemented by RFO FAR 16.507-6(b)(3), The order must be issued on a sole-source basis in the interest of economy and efficiency because it is a logical follow-on to an order already issued under the contract, provided that all awardees were given a fair opportunity to be considered for the original order. Awarding a one-month bridge contract to a new vendor would result in unacceptable duplicated transition-in costs and a ramp-up period that would consume the entire period of performance. Retaining the incumbent, Team Carney, Inc., is the only economical and efficient choice for a 30-day requirement.

[redacted]

This requirement was previously competed as a small-business set-aside against the General Administration Services (GSA)'s Human Capital and Training Systems (HCaTS) Government-wide acquisition contract. A follow-on requirement is currently being competed as a small business set-aside under HCaTS however, additional time is required to allow for the competition to occur.

If there is lapse in service, ST will be unable to complete the following in direct support of its mission:

- Develop and maintain about 750 active security-related training products across 13 security disciplines;
- Train civilian and military personnel within the Department of War (DoW) and across the Federal Government, cleared Industry employees, and authorized employees of foreign governments on how to perform their national security responsibilities; and
- Sustain the ST mission, risking national security by being unable to provide security training to DoW security professionals and practitioners, DCSA employees, and cleared Industry.

5. **Other Facts:**

   a) Market Research: Market research was performed in February 2026 for the ongoing competitive solicitation, and it revealed that there are two or more small businesses capable and interested in performing these commercial services.

6. **Interested Sources:**
   To date, no other sources have written to express an interest in this specific contract action, however as previously stated, there is an ongoing competitive solicitation occurring of which there have been multiple interested sources.

7. **Actions to Increase Competition:**
   The follow-on requirement has already been competitively solicited under the GSA HCATS contract vehicle. DCSA does not anticipate any subsequent noncompetitive acquisitions beyond this modification. This action is limited to one month to allow sufficient time to finalize the competitive acquisition. A one-month extension to the existing task order is the only acquisition strategy that provides continuity of the IDD services and mitigates harm to the Government.

8. **Fair and Reasonable Cost Determination:**
   The anticipated dollar value of the one-month extension is [redacted]. The Contracting Officer will ensure that the anticipated price is fair and reasonable based on the results of a detailed price analysis using a combination of the techniques at RFO FAR 15.404-1. The established labor rates being used were already determined fair and reasonable through adequate price competition during the initial award of the HCaTS task order, and the anticipated amount of [redacted] represents a strict prorated 1-month burn rate of

the current period of performance. This determination will be documented in the contract file.

9. **Technical or Requirements Personnel's Certification:**
I certify that the facts and representations under my cognizance, which are included in this justification, and which form a basis for this justification, are complete and accurate to the best of my knowledge and belief.

[redacted]

Reviews and Approval

Contracting Officer's Certification:
I certify that this justification is accurate and complete to the best of my knowledge and belief.

[redacted]