JUSTIFICATION REVIEW DOCUMENT
RFO Part 6 Justification and Approval
for Other than Full and Open Competition -

Program/Equipment: Planning and Programming (P&P) Architect -Engineer (A-E) Generation III (Gen III) multiple-award Indefinite Delivery Contract (IDC) for Master Planning and Real Property A-E Services

Authority: 10 U.S.C. 3204(a)(1) as implemented in Revolutionary FAR Overhaul (RFO) 6.103-1(c)(2), "Only One Responsible Source and No Other Supplies or Services Will Satisfy Agency Requirements."

Ordering Period: The current ordering period is 16 February 2023 to 15 February 2028. This justification request is for additional capacity only.

Amount: The current suite of the P&P IDC is valued at $160,000,000.00 (shared capacity). The request is for an additional $60,000,000.00 that would increase the total contract value to $220,000,000.00.

Prepared by: [redacted]

Contracting Officer: Pamela S. Smith
Procuring Contracting Officer
[redacted]

Technical/Requirements Representative: [redacted]

[redacted]

[redacted]

[redacted]

Control Number: [redacted]

HUNTSVILLE ENGINEERING AND SUPPORT CENTER REVIEWERS

I have reviewed this justification and find it adequate to support other than full and open competition.

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

PAMELA S. SMITH
Procuring Contracting Officer

[redacted]

[redacted]

[redacted]

Control Number: [redacted]

USACE HEADQUARTERS AND SENIOR CONTRACTING OFFICIAL REVIEWERS

I have reviewed this justification and find it adequate to support other than full and open competition.

[redacted]

[redacted]

RFO Part 6 Justification and Approval
for Other Than Full and Open Competition

1. Requiring Activity: United States Army Corps of Engineers (USACE), Huntsville Engineering and Support Center (CEHNC), Regional Planning Support Center (Master Planning and Real Property Support Branch), 300 Secured Gateway, Huntsville, AL 35808.

2. Contracting Activity: USACE, CEHNC, Contracting Directorate, 300 Secured Gateway, Huntsville, AL 35808.

3. Description of Action: Request approval to non-competitively modify the Planning and Programming (P&P) Architect Engineer (A-E) Generation III (Gen III) multiple award Indefinite Delivery Contracts (IDC) to increase the shared contract ceiling by $60 Million (M); from $160M to $220M. The increased ceiling will satisfy Fiscal Year 2026 (FY26) requirements for master planning and real property management needs to support existing and planned Department of Defense (DoD) facilities until the competitive P&P A-E Generation IV (Gen IV) multiple award IDC is awarded (slated for 30 September 2026). The Gen III IDC suite, awarded to nine (9) firms (see Table 1), supports firm fixed price task orders for master planning, programming, and related real property management services. Funding for task orders issued with the increased contract ceiling under this multiple award IDC are Operations and Maintenance (O&M) funds from the different services (Army, Air Force, and Navy) for FY26. Table 1 is a summation of the awarded task orders (TOs) and value (including base TO amount and optional tasks) by MATOC holders against the $160M total capacity as of 30 Sep 2025; totaling 94 task orders valued at $154,639,948.

***Table 1** – Planning and Programming A-E IDC (Gen III) Contractors, $160 Million Ceiling*

Contractor Name	Business Size	CAGE Codes	Base Contract Number	Dollars Obligated	Optional Tasks	# Task Orders Awarded
Parsons	Large	1BVK6	W912DY23D0002	$ 8,513,943	$ 1,571,878	9
HDR	Large	4JC81	W912DY23D0003	$ 16,286,709	$ 2,425,216	13
Michael Baker	Large	0KCH7	W912DY23D0004	$ 39,317,598	$ 3,146,942	14
WSP MOCA JV	Large	993K3	W912DY23D0005	$ 11,288,438	$ 1,768,062	11
Jacobs	Large	64X94	W912DY23D0006	$ 30,190,601	$ 3,809,844	15
Pond Woolpert JV	Large	7RF39	W912DY23D0007	$ 8,848,278	$ 626,803	8
Urban Collaborative	Small	51DG1	W912DY23D0008	$ 10,779,975	$ 12,379,735	14
Alliance	Small	6F2C8	W912DY23D0009	$ 741,626	$ 323,919	3
John Gallup - The Schriefer Group JF	Small	8WEQ1	W912DY23D0010	$ 2,388,261	$ 232,120	7
			Totals	$ 128,355,429	$ 26,284,519	94

Total IDC Capacity	$ 160,000,000
Total Capacity Used To Date	$ 154,639,948
Total Remaining Capacity To Date	$ 5,360,052

The ordering period for the current MATOC is for five years; including a two-year base period and a single three-year optional period. The acquisition was awarded in Feb of 2023 and ends in Feb of 2028. Almost all capacity was consumed by the end of FY25 with only $5,360,052 (rounded to $5.4 Million for the remainder of the document) remaining which will be exhausted by December 2025. It is anticipated that the requested additional $60M capacity is necessary to meet FY26 mission needs while a competitive replacement contract is put in place. The replacement contract is slated for award by September 2026.

4. Description of Supplies/Services: The master planning and real property services requirement is necessary to develop and maintain master planning documents, DD1391 programming documents, and related documented analyses for Military Construction (MILCON) and other facility development and facility management needs by DoD components. Deliverables are created, maintained, and transmitted using automated systems and include planning charrettes, facility utilization studies, land use and land

requirements analyses, real property management, area development plans, geospatial products, as well as energy studies.

***Table 2** – Planning and Programming A-E IDC Ceiling Increase Need*

[redacted]	Item / Category	In Millions
[redacted]	DD1391 / Charette Development Program	$ 7.90
[redacted]	BUILDER SMS System	$ 17.80
[redacted]	Annual Master Planning Requirements	$ 14.90
[redacted]	OASD Audit Compliance Directive Support	$ 24.30
[redacted]	Total Capacity Need until award of Gen IV IDC	**$ 64.90**

Total Capacity Need until award of Gen IV IDC	**$**	**64.90**
Existing Capacity Remaing on Gen III IDC	**$**	**(5.40)**
Capacity Shortfall / Amount Requested	**$**	**59.50**
J&A Amount Requested (rounded)	**$**	**60.00**

***Table 2a** – Planning and Programming A-E IDC FY26 Need*

Branch	Customer	FY26 Need	Project Description	MANDATE
[redacted]				

[redacted]

Total FY26 Capacity Needed	$ 64,900,000
Existing Capacity Available	$ 5,400,000
Total Capacity Request	$ 59,500,000
Rounded Capacity Request	$ 60,000,000

Tables 2 and 2a above presents the calculation of the total amount needed to support work until such time that the follow on, Gen IV contract can be awarded in September of 2026 (rounded to the nearest million). Further information regarding these FY26 needs are detailed in the paragraphs below. An approximate 7% (6.6%) was added to the capacity shortfall to account for economic uncertainties or unknown changes related to the procurement estimates of known requirements.

The following is a list of the enterprise or USACE command level support requirements that are at risk for FY26 execution.

a. **DD 1391 (Fiscal Year Military Construction Project Data form) and Design Charette Program:** CEHNC provides USACE programmatic support to other military services via a Memorandum of Record titled 'Record of Decision of the Military Construction and Army Family Housing DD Forms 1391, ENG Form 3086s and supporting documentation Technical Center of Expertise' signed 12 Apr 24 by HQ USACE. Under the P&P mission, CEHNC provides:

- Annual Army DCS, G-9 [redacted]) Centralized Planning Charrette support that validates aging and dated DD Form 1391s.
- Support to the Energy Resilience and Conservation Investment Program (ERCIP) ([redacted]) for Planning Charrette Requirements on various installations.

In total, the specific CEHNC major acquisitions for DD1391/Charette Development accounts for [redacted] in required command-level services to support the Army/DoD.

b. **BUILDER™ Sustainment Management System (SMS) application support to AMC's Organic Industrial Base (OIB) Program:** CEHNC has a signed agreement with IMCOM titled "Agreement - IMCOM BUILDER Sustainment at Organic Industrial Base Sites' signed 4 Jan 2023 to support AMC. Specifically, to support the AMC Organic Industrial Base (OIB) sustainment effort in BUILDER SMS to maintain accountability of facility conditions for facilities across the entire OIB portfolio. Needed services for this program until the new contract is awarded is approximately [redacted]

c. **Annual regulatory Master Planning Requirements of the military services to comply with 10 U.S.C. 2864, "Master Plans for Major Military Installations":** Annually by law major installations must have a Master Plan, which is a comprehensive long-term strategic document that guides the development and management of installation facilities. DoD Instruction (DoDI) 4165.70, Real Property Management, and Unified Facilities Criteria (UFC) 2-100-01, Installation Master Planning, implements this law. Annually, the Army MACOMs, the U.S Army Reserve, the Air Force and Navy come to HQ USACE, and subsequently to CEHNC (via HQ USACE Installation Readiness Division), to fulfill their annual master planning requirements. The Army MACOMs, and other military services, are estimated to require [redacted] in master planning services from USACE to comply with DoDI 4165.70 and UFC 2-100-01.

d. **Office of the Assistant Secretary of Defense (OASD) Directive for Audit Readiness of Real Property Accountability**: The 2018 National Defense Strategy (NDS) initiated improvements on transparency, accountability, and process improvement to enhance DoD operations. The initiative, called Financial Improvement and Audit Remediation involved several OASD memoranda (October and November 2023, and more in January and February 2024) to improve audit readiness

[redacted]

within DoD, which included real property accountability. Based on these directives, the military services use either existing information systems or must initiate and complete studies within the next 2 years to be compliant with the OASD directive for real property accountability and visibility. The U.S. Marine Corps have come to CEHNC with requirements totaling [redacted] to meet this mandate. The Army has [redacted] in requirements to meet this directive. The Air Force has requested [redacted] in capacity.
In total, the CEHNC Regional Support Center shall provide [redacted] in requirements to allow the military services to comply with the OASD directive.

Based on the above requirements, a ceiling increase of [redacted] of the P&P A-E IDC from the original [redacted] contract award amount to [redacted] is necessary for the CEHNC Regional Planning Support Center to allow the DoD activities to deliver their master planning and real property mission through September 2026, which is the last date CEHNC will execute known requirements under Gen III. Any requirements that come after September 2026 will be under Gen IV, the new IDC.

5. Authority Cited: Title 10 U.S.C. 3204(a)(1), as implemented in RFO 6.103-1(c)(2)(i) (formerly FAR 6.302-1(a)(2)(iii)(A)) and RFO 6.103-1(c)(2)(ii) (formerly FAR 6.302-1(a)(2)(iii)(B)), which provide that for DoD, services may be deemed as available from only one source, when awarding a contract for the continued provision of highly specialized services would result in (i) substantial duplication of cost to the Government that is not expected to be recovered through competition, or (ii) unacceptable delays in fulfilling agency requirements. As discussed below, the duplication of cost is estimated at [redacted] and estimated delays range from 9 to 15 months.

6. Reason for Authority Cited:

a. Background: The USACE CEHNC Regional Planning Support Center is designated as the DD1391 and ENG 3086 Technical Center of Expertise and holds mission assignments for the Organic Industrial Base BUILDER program. The CEHNC Regional Planning Support Center delivers statutory master planning and programming requirements worldwide at the outset of the facility lifecycle, providing the foundational products—requirements analysis, master planning, and DD1391 development—that initiate MILCON and long-term facility strategies. The current Gen III P&P A-E IDC was competitively awarded on 16 March 2023 to nine qualified firms (see Table 1) and a ceiling value of $160 Million, with an anticipated annual capacity usage (i.e., 'burn rate') of $32 million per year. This burn rate was consistent with historic workload trends and based on validated customer demand forecasts. However, actual workload has far exceeded projections due to three major, enterprise-wide surges:

(1) The National Defense Authorization Act (NDAA) for Fiscal Year 2018 (Public Law 115-91) Title X, Subtitle A contains the generalized requirements for audit compliance mandates. Beginning in late FY22, new requests from the Army, Navy/Marine Corps, and Air Force required extensive asset evaluation, data validation, and audit support in accordance with DoD Financial Management Regulation (DoD FMR) 7000.14. These requirements involve detailed on-site condition assessments, reconciliation with systems of record, and multi-installation coordination—often across district boundaries. Because CEHNC is not limited to a geographic region, HQ USACE IRD assigned CEHNC to support these mandates. CEHNC was assigned as the Mission Assignee to support BUILDER requirements within the Organic Industrial Base in August 2022.

(2) Office of the Secretary of Defense (OSD) Barracks Initiative – Following the September 2023 GAO report on military barracks conditions and related FY24 NDAA provisions, OSD directed all services to conduct comprehensive housing and barracks assessments. Congressional attention and safety concerns have created compressed schedules, resulting in dozens of unanticipated task orders. These efforts require rapid deployment of specialized planning teams with established facility assessment protocols.

(3) Electric Vehicle (EV) Charging Station Directive – Executive Order (EO) 14057, Catalyzing America's Clean Energy Economy Through Federal Sustainability, issued on 08 December 2021, mandated transition of the federal vehicle fleet to a zero-emission fleet by 2035. This mandate required assessments and planning for the placement of EV charging stations at Army installations worldwide.

Although EO 14057 was later rescinded by EO 14148, Initial Rescissions of Harmful Executive Orders and Actions, on 20 January 2025, the requirement triggered immediate feasibility studies and integration planning with existing infrastructure, consuming substantial Gen II and Gen III A-E capacity (approximately $13.5M) during FY22–FY24.

These policy-driven surges were not foreseeable at the time of the Gen III award. Further, alternative acquisition approaches to meet these needs were not feasible. Most requests for contract support through our customer base are made during the second and third quarter of the fiscal year. Complying with the aforementioned surges using other contract vehicles was not tenable due to the restricted time to complete the award. Utilizing the Gen III ordering vehicle instead of a stand-alone contract was the only means of executing these customer needs prior to year-end funding expiration and requirement need dates.

P&P Branch performs a routine assessment of contract capacity once a quarter. Results of our contract capacity analysis in the 1st QTR of FY24 indicated that the total amount awarded during FY23 year-end operations exceeded the estimated glide path of $32M by approximately $10M for approximately $42M in total awards for the FY. During January of 2024, our office was approached by several customers, most notably the Marine Corps and IMCOM, requesting expanded support to be awarded by the end of FY24. Based on exceeding the planned burn rate and requests for expanded support, CEHNC initiated Gen IV IDC planning in December 2024 and accelerated acquisition milestones to achieve a projected award timeframe of September 2026. See Section 11, "Other Facts" for additional details on the progress of the recompete efforts.

The remaining Gen III capacity—currently $5.4 Million—will be exhausted by 01 December 2025, leaving a 12-month gap before Gen IV award. AMC has requested all $5.4 Million in remaining capacity to be awarded against a OIB BUILDER maintenance task order. Our office will have no remaining capacity with which to accommodate any additional FY26 requirements. [redacted] The requested $60 million capacity increase is necessary to sustain essential mission support during the gap until Gen IV is awarded. Without it, critical master planning, programming, and real property management services will halt, resulting in statutory non-compliance, MILCON delays, and substantial duplication of cost if requirements are diverted to alternative vehicles.

b. Justification: An increase to the shared contract capacity of the CEHNC P&P Branch IDCs is needed to allow the current P&P A-E IDCs' awardees to continue providing the highly specialized services required to support ongoing operations in master planning, MILCON programming, and real property systems of record until new IDCs can be awarded.

The services provided under the IDCs are considered highly specialized Architect-Engineering (A-E) Services. These services are, by definition, professional services of an architectural or engineering nature. As defined by State law, if applicable, they are required to be performed or approved by a person licensed, registered, or certified to provide those services, and that are associated with research, planning, development, design, construction, alteration, or repair of real property. Most A&E firms engage in and have extensive manpower to support general design, construction of new or repair/maintenance of existing real property assets. An individual A&E firm will have one or more of the required disciplines on staff to provide support, but most will not have all of the skill sets required to support CEHNC P&P Branch's particular mission. Only a small subset of A&E firms employ dedicated branches devoted to the specialized areas of Master Planning, Programming Document Development, Real Property Systems of Record, and Facility Assessments. Support of CEHNC P&P Branch product lines require a diverse team of subject matter experts in such fields as urban planning, BUILDER database experts, various engineering disciplines (electrical, structural, fire protection, industrial and manufacturing engineers), architects, site planners, GIS experts, and other disciplines.

The P&P A-E IDCs' awardees were selected based on evidence of significant institutional knowledge of Master Planning, Programming Document Development, Real Property Systems of Record, and Facility Assessments as documented within their SF330s. All nine (9) current IDC holders had extensive

experience prior to award of the current IDCs. This institutional knowledge has only continued to develop over the three years of the current IDCs. As such, the current IDCs' awardees will be able to continue to support the ongoing missions without having to expend excess additional time assessing the work, forming a competent team to execute the statement of work (SOW), researching reference/guidance documents, developing a schedule for completion, structuring an analysis methodology, and similar such tasks.

The additional cost and time associated with an alternative method of support is not recoverable through competition and will result in an unacceptable delay in fulfilling the Agency's needs as discussed below in Section C, Alternatives. The nominal timeline for award of a task order against the current IDC is 60 days between the point of requirement package submission and award. The nominal timeline for award of a new contract is 180 days between the point of requirement package submission and award.

Further additional costs can be attributed to loss of efficiency, both on the part of the contractors, as well as by the Government. The highly specialized nature of the work will require a learning curve on the part of new contractors. This is minimized with the current IDCs' awardees who already have the specialized skill set and significant institutional knowledge of the requirements. Seasoned contractors will be subject to little to no learning curve impacts, whereas an uninitiated contractor should have significant learning curve impacts. When awarding a task order to any one of the current nine IDC holders, there is very little effort or time expended by either the contractor or the Government in assessing the work, forming a competent team to execute the SOW, researching reference/guidance documents, developing a schedule for completion, structuring an analysis methodology, and similar such tasks. The vast majority of the task orders awarded under the current IDCs require only a minimum of time for initial implementation activities. The current IDC contractors are therefore able to commence technical work within the first two weeks following contract award. This level of efficiency would be reduced if a new or non-IDC awardees were utilized to support CEHNC P&P Branch requirements.

If the Government acquires the required services competitively, there would be both substantial duplication of cost to the Government that could not be recovered through competition, as well as unacceptable delays in fulfilling the agency's requirements. Delay until a competitively sourced contract can be awarded will result in significant impacts to three measures of DoD effectiveness: 1) Health, Life and Safety of the warfighter population, 2) Financial Management, 3) Command and Control.

c. Alternatives: The Government explored several alternatives besides increasing the Gen III IDC capacity. Each was determined to be impractical or detrimental to mission performance:

(1) Use of Other USACE District IDCs – CEHNC coordinated with multiple districts and HQ USACE; all reported no available capacity. Several were themselves at ceiling or in the process of recompeting their own IDCs.

(2) Use of Other CEHNC Contracts – Existing CEHNC contracts do not have the required scope for master planning, real property programming, and global geographic execution. Geographic restrictions and scope limitations would prevent execution of a significant portion of the current workload.

(3) Accelerate Gen IV IDC (the follow-on procurement) – Even with accelerated milestones, the earliest award date is 30 September 2026. CEHNC has accelerated this timeline (was initially in May 2027) by implementing proactive measures such as:

- Early completion of key pre-synopsis documents (synopsis, selection plan, and board appointment letters are completed and currently under HNC review).
- Combining and shortening review times (e.g., reducing the BoB Selection Report review from 20 days to 10 days).
- Conducting telephonic/virtual negotiations within one week, compared to the typical 2-3 weeks required when using written-only negotiation methods.

However, this approach still leaves a 12-month window where no suitable contract vehicle exists to meet mission needs. Therefore, while this accelerated schedule is being implemented, it is not a viable solution to meet FY26 needs.

(4) Stop-gap IDC Contract – A competitive stop-gap multiple-award IDC procurement would still require 7–9 months to award, resulting in an unavoidable interruption to services, preventing projects from utilizing FY26 O&M funding. Staffing resources are currently maximized on accelerating the longer term re-compete effort. Pursuing the stop gap would require leveraging the same resources and therefore duplicate effort related to acquisition planning and pre-award activities.

(5) Standalone "C" Contracts – Using a different acquisition approach and executing the identified projects outside the Gen III IDC as stand-alone A-E contracts also was not a feasible alternative. This approach will not meet mission timelines, would cost more, and leave a majority of the FY26 anticipated projects unawarded by the end of the fiscal year.

(i) Time Impacts: This alternative would require awarding projects as individual "C" type contracts under FAR 36.6 and USACE Engineer Pamphlet (EP) 715-1-7 procedures, and would cause unacceptable delays, or possibly prevent, executing stakeholder's annual O&M funds. Generally, under the best circumstances, the master planning / real property services projects arrive at CEHNC for execution by 2nd Quarter or later, with the earliest solicitations going out late 2nd Quarter / early 3rd Quarter. MILCON and master planning priorities both at the command level and the installation level change rapidly based on administration directives and priorities. Customers will generally respond with a request for contract support only when they have reasonable assurances that a given directive or course of action has been vetted and approved by leadership. This process necessarily results in Government delays to authorizing projects into the late second and third quarter of each fiscal year. Using this alternative, CEHNC Contracting, along with the rest of the PDT to include Engineering, could manage a maximum of six (6) A-E stand-alone procurements concurrently due to staffing and process limitations. Each anticipated stand-alone procurement, assuming an average value of $3.5M, takes approximately 180 days from A-E synopsis to A-E down-select and selection, through solicitation and negotiations, and eventually to award. As a result of this resource and process constraint, stand-alone contracts would have to occur in 'batches': The first six stand-alone A-E projects (initial batch) could successfully get awarded in FY26 (within about 180 days) – assuming a solicitation (A-E synopsis) release date in late 2nd Quarter. [redacted] Therefore, the remaining projects would not get awarded until late 1st Quarter FY27 or until 4th Quarter FY27—well beyond the FY26 fiscal deadline. This would cause later batches of project awards to not occur until 9–15 months after the first batch was solicited, depending on any administrative gaps between later batches—causing stakeholders to lose their FY26 funding. See Table 3 below for graphical representation of the [redacted] projects at risk using this alternative.

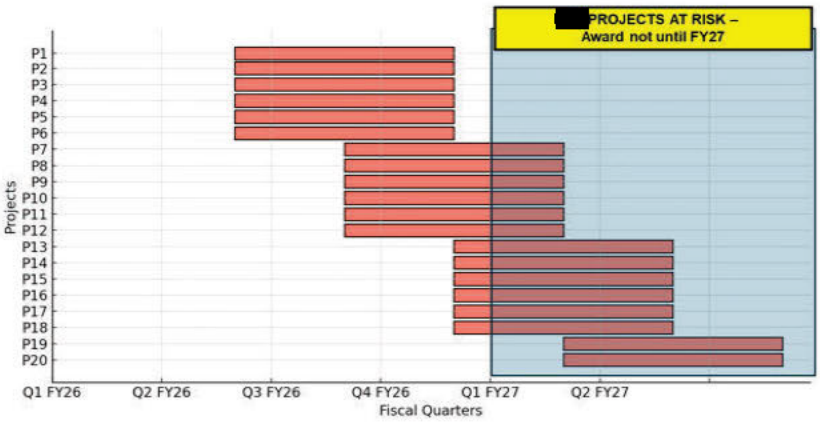
(ii) Cost Impacts: Under this alternative, the labor cost for 20 stand-alone contracts would be an additional $1,010,781 in labor versus performing IDC task orders (see Table 3 below). Therefore, CEHNC would duplicate over $1M or more in labor costs that were already utilized when the Gen III IDC was initially awarded. Additionally, because use of stand-alone contracts would cause delays wherein projects miss critical O&M funding or statutory compliance deadlines, including Program Objective Memorandum (POM) submissions and audit reporting cycles, as discussed above, installations would likely have to defer requirements into future fiscal years, further increasing costs due to inflation and rework. See Table 3 below for an explanation of the cost and time impacts of this alternative.

***Table 3** – Time and Cost Impacts for Use of Stand-Alone Contracts*

Acquisition Type	PALT in calendar days (assumes a $3.5 Million action)	# of PDT Labor Hours per Action	Average PDT Member Wage Rate	Total Labor Cost (Per Action)	Cost [redacted]	Time [redacted]
IDC Task Order	60 Days	115	146.49	$ 16,846.35	$ 336,927.00	can award task orders before end of fiscal year
Stand-Alone Contract	180 Days*	460	146.49	$ 67,385.40	$ 1,347,708.00	Can award 6 Stand-Alone Contracts within the fiscal year
				IMPACTS:	**$ 1,010,781.00**	**Delays of 9-15 months; not within FY26**

***Note** : Although DOD estimates PALT for "C" Contracts at $3.5 Million to take 120 days, A-E stand-alone procurements require two stages of advertisment, with the last stage potentially resulting in several rounds of negotiations when the level of effort is not well-defined, particularly for master planning / DD 1391 charette type requirements. An IDC Task Order leverages the A-E TORN process of pre-qualified contractors

Time Impacts of Stand-Alone Contracts



***Note:** the bars in the graph represent the start (A-E synopsis) and completion (award) times for stand-alone A-E procurements, by project (P1 through P20)*

d. Impact if Not Approved: If this justification is not approved, CEHNC Regional Planning Support Center will be forced to stop issuing task orders once the Gen III ceiling is reached, resulting in the following detrimental impacts:

(1) Mission Disruption – DD1391 development and planning charrettes feeding into the POM process will be halted for FY26, delaying or eliminating over [redacted] in future MILCON projects.

(2) Statutory Non-Compliance – Master planning and audit compliance work mandated under 10 U.S.C. § 2864, the FY18 NDAA, and related DoD policies will stall, risking loss of compliance certifications and Congressional scrutiny.

(3) Substantial Duplication of Cost – Without the Gen III ceiling increase, requirements would have to be shifted to new standalone contracts, creating at least [redacted] in avoidable costs. These costs stem from duplicating acquisition processes with limited acquisition and engineering expertise and does not leverage use of pre-qualified contractors in the Gen III IDC pool.

(4) Unacceptable Delays – Moving to standalone procurements would extend acquisition timelines by 9-15 months for most of the anticipated projects, causing critical deadlines—FY26 fiscal funding deadlines as well as mission deadlines such as submission of audit-ready real property data, POM inputs, and Congressional MILCON justification packages—to be missed. These missed windows are not recoverable in the same fiscal year, meaning installations would lose an entire year in their planning and funding cycles.

In addition, the following paragraphs address the overall impacts

[redacted]

a. ***DD 1391 (Fiscal Year Military Construction Project Data form) and Design Charette Program:*** Huntsville Center – Planning and Programming Branch has a mission assignment and is the Technical Center of Expertise (TCX) for DD1391/ENG3086 and is tasked to complete this work for the Department of the Army, specifically the Army Deputy Chief of Staff for G-4. This work directly supports the process by which DD1391s progress through the review process into military construction projects (MILCON). HNC Planning and Programming is the mechanism by which a DD1391 is validated for both scope and cost when a project progresses from the Future Years Development Plan (FYDP) to the Program Objective Memorandum (POM). The POM is the MILCON budgeting document that is reviewed and approved by Congress and the President for design and construction funding. HNC Planning and Programming is the only branch within USACE that provides this support. Failure to award a task order for DD1391 support will cause the MILCON DD1391 for FY26 and beyond to be delayed a full year and impact over [redacted] in future MILCON projects. Failure to award task orders by the end of the fiscal year in support of this work will result in an immediate break in the one-year delay for the FY26 military construction cycle. Such a delay would directly cause break in the continuity of services and jeopardize the progression of critical MILCON projects; thus, stalling essential infrastructure development and compromising the Army's long-term budgetary objectives as reviewed by Congress and the President. This effort is typically awarded via three or four task orders each fiscal year. Current customer interest indicates the same type of expected contractual execution.

b. ***BUILDER™ Sustainment Management System (SMS) application support to AMC's Organic Industrial Base (OIB) Program:*** Huntsville Center – Planning and Programming Branch has a mission assignment to complete this work for the Department of the Army, specifically in support of the Organic Industrial Base. The National Defense Authorization Act (NDAA) for Fiscal Year 2018 (Public Law 115-91) Title X, Subtitle A contains the generalized requirements for audit compliance mandates with DoD Financial Management Regulation (DoD FMR) 7000.14 containing specific guidance as it pertains to installation facilities and infrastructure. Failure to award a task order for SMS support to the OIB will cause AMC to fail audit compliance for facilities and infrastructure. Thus, failure to award task orders by the end of the fiscal year in support of this work will result in a direct breach of statutory audit compliance requirements. Such failure would leave Army Materiel Command (AMC) unable to certify the financial readiness of its facilities and infrastructure, resulting in a failed audit opinion for the OIB and potentially jeopardizing future funding authorizations for the Army's 23 depots, arsenals, and ammunition plants; and their overall work efforts. This effort is typically awarded via three task orders each fiscal year. Current customer interest indicates the same type of expected contractual execution.

c. **Annual regulatory Master Planning Requirements of the military services to comply with 10 U.S.C. 2864, "Master Plans for Major Military Installations":** Annually by law major installations must have a Master Plan, which is a comprehensive long-term strategic document that guides the development and management of installation facilities. DoD Instruction (DoDI) 4165.70, Real Property Management, and Unified Facilities Criteria (UFC) 2-100-01, Installation Master Planning, implements this law. The focus of this effort is on the annual update of a pre-existing document to account for changes over the previous 12 months. It is a requirement of any MILCON project that it must be sited on a Master Plan to be included into the Program Objective Memorandum (POM) and be eligible for MILCON design and construction funding. Failure to award a task order for Master Planning support will cause the delay of project DD1391s into the POM and that projects design and construction. Thus, failure to award task orders in support of this work will result in an immediate one-year delay for future year military construction cycles. Similar to the impacts of non-award of DD1391 support task orders, such a delay would directly jeopardize the progression of critical MILCON projects; thus, stalling essential infrastructure development and compromising the Army's long-term budgetary objectives as reviewed by

Congress and the President. Master plans are typically awarded by location, and a task order will be awarded for each individual location based on customer need. Based on customer interest, the program is expecting similar work requirements as past years for FY26, as shown in Paragraph 4, Table 2.

d. ***Office of the Assistant Secretary of Defense (OASD) Directive for Audit Readiness of Real Property Accountability***: The 2018 National Defense Strategy (NDS) initiated improvements on transparency, accountability, and process improvement to enhance DoD operations. The initiative, called Financial Improvement and Audit Remediation involved several OASD memoranda (October and November 2023, and more in January and February 2024) to improve audit readiness within DoD, which included real property accountability. Based on these directives, the military services use existing information systems or must initiate and complete studies within the next 2 years to be compliant with the OASD directive for real property accountability and visibility. Failure to award task orders in support of Audit Readiness of Real Property Accountability will result in failure of the Army to meet audit compliance mandates as set out by the OASD. This outcome would leave the service unable to certify the existence and completeness of its real property portfolio, jeopardizing the Army's ability to achieve a clean audit opinion by 2028 and potentially leading to Congressional spending reductions or further audit related reductions. This effort is typically awarded via three to four task orders, but it depends on the type of property being assessed, which will be indicated in the approved performance work plans for the customers.

Overall, without the increase of the IDC ceiling of $60M, the combination of lost time, increased cost, and statutory risk directly undermines the Army's and DoD's ability to manage a $2.2 Trillion real property portfolio, protect the health and safety of service members, and maintain readiness.

7. Efforts to Obtain Competition: The award of any task order against the increased capacity on the P&P A-E Gen III IDC will be subjected to all applicable TORN requirements under USACE Engineer Pamphlet (EP) 715-1-7 procedures. The follow-on P&P A-E Gen IV IDC will likewise be competed amongst multiple contractors. The ceiling increase is necessary only to cover the gap between any remaining capacity on the Gen III IDC and the start of the Gen IV IDC for known requirements. A notice of intent to increase capacity was posted 12 March 2025 on SAM.gov under number PANHES-25-P-0000-001969 and closed on 24 March 2025 (see section 9 Market Research).

a. Effective competition. All task orders awarded under this capacity increase will be competed in accordance with the IDC ordering procedures and FAR 16.505(b)(1), Fair Opportunity.

b. Subcontracting competition. All large business firms under the P&P A-E Gen III IDC were required to submit a Small Business Subcontracting Plan prior to award which, at a minimum, should be consistent with their Small Business Participation Plan. Ample opportunity exists for subcontracting. The following small business participation goals were included in P&P A-E Gen IIII:

- Small Business - 20%
- SDB - 5%
- WOSB - 5%
- HUBZone - 2%
- VOSB - 4%
- SDVOSB - 3%

8. Actions to Increase Competition: HNC will issue the synopsis for the follow-on acquisition, P&P Gen IV AE IDC for $890M in March of 2026. This acquisition is anticipated to be awarded in September of 2026. Any extension of contract capacity because of this J&A are only to be made available during the 12-month window between 01 October 2025 and 30 September of 2026, the anticipated award date of

the Gen IV IDC It is anticipated the current capacity remaining on the Gen III IDC ($5.4M) will be exhausted within first quarter FY26.

9. Market Research: Market research was completed in March 2025 & September 2025 to identify all qualified sources to substantiate the increase of the ceiling for the P&P A-E Gen III IDC.

a. Sources Sought Notice - Increase Capacity: A notice of intent was posted 12 March 2025 on SAM.gov under number PANHES-25-P-0000-001969 and closed on 24 March 2025. As required by DFARS PGI 206.302-1, the notice informed interested parties of the Government's intent to pursue an increase in capacity non-competitively. There were four (4) responses received. See Table 4 below:

***Table 4** – Results of Sources Sought Notice IAW DFARS PGI 206.302-1*

Business Name	UEI	Size	Experience	P&P Capability
[redacted]	[redacted]	Large	[redacted]	Qualified
[redacted]	[redacted]	Small	[redacted]	Minimally Qualified
[redacted]	[redacted]	Small	[redacted]	Minimally Qualified
[redacted]	[redacted]	Large	[redacted]	Qualified

Information submitted by each of the respondents was analyzed and assessed against the aggregated requirements of the contract scope of work in order to arrive at a determination of capability.

[redacted]

Overall, there are only two firms that are potentially qualified; however, doing a stand-alone contract for the two identified above would not be feasible given the reasons in Section 6 of this document. Regardless, all firms will have the opportunity to compete on the Gen IV acquisition.

b. Search of Existing Vehicles: In March 2025, multiple sources were searched for existing contract vehicles able to satisfy this requirement. Mandatory and preferred sources were searched first including Ability One, UNICOR, and GSA's FSSI. While some engineering related services were available, none were capable of providing AE services under the Brooks Act. Further searches were conducted on the Interagency Contract Directory and Federal Procurement Data Systems to identify if other agencies had IDIQs that CEHNC could order from. Although the searches resulted in numerous contract actions performed for the respective NAICS, PSC and acquisition related keywords, no available contract vehicles were identified that support the requirements of the P&P acquisition.

c. IDC Request for Information: A request for information was sent on 11 September 2025 to determine if the current P&P GEN III AE IDC firms were interested and capable of providing increased

[redacted]

support between now and the end of FY26. All firms on the IDC provided confirmation that they are interested and have the capabilities and resources to support the increased capacity.

10. Interested Sources: No additional interested parties other than those discussed above in Section 9 have expressed interest. These parties were not deemed feasible for reasons as stated in Section 9a.

11. Other Facts: The procurement history and additional facts supporting the use of other than full and open competition are described below:

a. Procurement History.

(i) The current P&P AE IDC is the third generation (or iteration) for similar services. This IDC has a capacity of $160M and was awarded on 13 Feb 2023 to nine contractors (six Other than Small Businesses (OTSBs) and three small businesses). Below are the firms and their associated contract numbers:

- Parsons - W912DY23D0002
- HDR - W912DY23D0003
- Michael Baker - W912DY23D0004
- WSP MOCA JV - W912DY23D0005
- Jacobs - W912DY23D0006
- Pond Woolpert JV - W912DY23D0007
- Urban Collaborative - W912DY23D0008
- Alliance - W912DY23D0009
- JG&A – TSG JV - W912DY23D0010

(ii) Prior to this current P&P AE IDC was the 2nd generation IDC for similar services. This competitive IDC had a capacity of $100M and was awarded on 06 Dec 2017 to six contractors (five OTSBs and one small business).

- HDR - W912DY18D0003
- HB&A - W912DY18D0005
- Jacobs - W912DY18D0006
- Parsons - W912DY18D0007
- Pond Woolpert JV - W912DY18D0008
- Urban Collaborative - W912DY18D0009

A capacity increase in the amount of $40M was requested and approved for this MATOC on 17 September 2021 (new ceiling totaling $140M) via the Real Property Planning, Programming, and Management Support Architect-Engineer Indefinite Delivery Contracts, on an other than full and open competition basis, pursuant to the authority of 10 United States Code 2304(c)(1) as implemented in Federal Acquisition Regulation 6.302-1(a)(2)(iii)(B), Only one responsible source and no other supplies or services would satisfy agency requirements. The efforts and actions that were discussed to increase competition at that time with CEHNC Pre-Award Division were congruent with pursuing award of the current P&P IDC which was awarded in March 2023. A qualification-based selection process in accordance with FAR 36.6 and the Brooks Act were sought under the follow-on new P&P IDCs' contract. The new IDCs allowed future awards that continued to assure fair opportunity in accordance with the current A-E acquisition regulatory guidelines.

(iii) The first-generation P&P AE IDC was awarded on 19 Jun 2012 for similar services. This IDC had a capacity of $45M (and was awarded to four OTSBs.

- Atkins MOCA JV - W912DY12D0045
- Gallup – Woolpert JV - W912DY12D0046
- HDR - W912DY12D0047
- Parsons - W912DY12D0048

[redacted]

A capacity increase in the amount of $13M was approved for this MATOC on 01 March 2017 (new ceiling totaling $58M) for the Property Planning and Programming Architect-Engineer Services on an other than full and open competition basis, pursuant to the authority of 10 United States Code 2304(c)(1) as implemented in Federal Acquisition Regulation 6.302-1(a)(2)(iii)(B), Only one responsible source and no other supplies or services would satisfy agency requirements. The efforts and actions that were discussed to increase competition at that time was in the planning phase for replacement A-E contracts in support of the P&P Program. Market research for this requirement showed that there were no other large firms with the expertise qualified and capable of performing the requirements for the P&P Program without initiating a short-term contract to sustain the existing program. In addition, market research showed that the information received from small businesses that submitted information for the acquisition were qualified with the expertise and qualifications required under the existing contract. Thus, the new procurement was competed under the Brooks Act and not be sole-sourced.

Each J&A discussed was implemented when a new IDC was already in the works. However, the subsequent acquisitions were based on full and open competition efforts, as implemented per the market research on those previous acquisitions.,

b. The competitive status of these actions. All the P&P AE IDCs shown above were solicited and awarded full and open competition. However, the Generation I and II IDC's each had non-competitive modifications to increase the contract capacity as detailed in paragraph a, procurement history, above.

c. Authority Previously Used for Other Than Full and Open Competition. The same authority was used for both previous J&As, 10 United States Code 2304(c)(1) as implemented in Federal Acquisition Regulation 6.302-1(a)(2)(iii)(B), Only one responsible source and no other supplies or services will satisfy agency requirements.

d. If a prior contract was accomplished using Full and Open Competition, include details on why sources are being limited. The prior acquisitions were procured using competitive procedures, however, as described above increases to contract capacity were processed to accomplish critical mission needs while competitive replacement acquisitions were finalized.

e. Explanation of unusual patterns in procurement history. There has been a capacity increase for each P&P AE IDC that has been awarded. The level of planning and support for real property systems of record to comply with audit and financial regulations has increased significantly over the last decade. This has resulted in an increase in the amount and number of tasks and projects being requested of Planning and Programming branch. Capacity requested within the original acquisition estimate has failed to sufficiently provide for the level of customer request. This is not just a Huntsville Center problem but a problem that is currently plaguing all such branches across the Corps of Engineers.

f. Additional Facts.

(i) CEHNC officially transferred approximately [redacted] of the total shared capacity of $160M on the current IDC to other USACE Districts. All capacity transfers were completed in support of FY23 year-end operations. At the time of these transfers, the government did not anticipate any capacity shortfalls.

(ii) The planning for the replacement Gen IV IDC began in Dec 2024. Below details the progress of the recompete effort and the planned timeline to meet a September 2026 award date:

Completed Activities

- 09 Dec 2024 - Area of Operations First Right of Refusal documents signed
- 07 Mar 2025 - CSE Memo was signed
- 23 May 2025 – Market Research Report approved
- 11 June 2025 – DD2579 approved
- 3 June 2025 – Prepare AS/AP

[redacted]

- 10 July 2025 – Prepare AS/AP & Incorps. Comts – KO
- 10 July 2025 - Prepare AS/AP & Incorps. Comts – OC
- 6 June 2025 - Prepare AS/AP & Incorps. Comts – SB
- 16 July 2025 - Prepare AS/AP & Incorps. Comts – Level Up
- 19 Sep 2025 - Prepare AS/AP & Incorps. Comts – BOB
- 24 Sep 2025 - Prepare AS/AP & Incorps. Comts – CCC
- 24 Sep 2025 - Prepare AS/AP & Incorps. Comts – LAFC

Milestone Schedule

- 13 Nov 2025 – SCO Approve AS/AP
- 20 Jan 2026 – DASA(P) Approve AS/AP
- 20 Jan 2026 – Approve AS/AP
- 27 Jan 2026 – Review Selection Plan + Synopsis, Incorp, Cmts & Approve – KO
- 27 Jan 2026 – Review Selection Plan + Synopsis, Incorp, Cmts & Approve – OC
- 04 Feb 2026 – Review Selection Plan + Synopsis, Incorp, Cmts & Approve - SB
- 12 Feb 2026 – Review Selection Plan + Synopsis, Incorp, Cmts & Approve - Lvl Up
- 13 Mar 2026 – Review Selection Plan + Synopsis, Incorp, Cmts & Approve - BOB
- 20 Mar 2026 – Review Selection Plan + Synopsis, Incorp, Cmts & Approve - CCC
- 23 Mar 2026 - Post Synopsis to Industry
- 05 May 2026 - Receive SF330s
- 19 May 2026 - Selection Board Interviews
- 02 Jul 2026 - Selection Board Signed by SSA
- 09 Jul 2026 - Issue RFPP
- 05 August 2026 – Evaluate Price Proposals
- 30 Sep 2026 – Award Contracts

The current award date of the Gen IV acquisition is scheduled for 30 September 2026. The original award date for this acquisition was 06 May 2027. The team has already successfully employed some milestone acceleration techniques and will continue these efforts by the KO for this acquisition to collapse the schedule and deliver the award on or before 30 September 2026.

12. Technical Certification: I certify that the supporting data under my cognizance, which are included in the justification, are accurate and complete to the best of my knowledge and belief.

[redacted]

13. Requirements Certification: I certify that the supporting data under my cognizance, which are included in the justification, are accurate and complete to the best of my knowledge and belief.

[redacted]

14. Fair and Reasonable Price Determination: I hereby determine that the anticipated price to the Government for this contract action will be fair and reasonable based on the use of the previously evaluated and negotiated option year rates. All task orders and modification to them, will be held to the IDC rates and evaluated against an Independent Government Estimate, as necessary. Historic Pricing for similar efforts and material under current and past task order as required in accordance with FAR 15.403.

[redacted]

Pamela S. Smith
Procuring Contracting Officer

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

[redacted]

Pamela S. Smith
Procuring Contracting Officer

[redacted]

Control Number: [redacted]

Approval

Based on the foregoing justification, I hereby approve the shared capacity increase of $60,000,000.00 for the Planning and Programming Architect-Engineer (A-E) Generation III multiple-award Indefinite Delivery Contract for Master Planning and Real Property A-E Services on an other than full and open competition basis pursuant to the authority of Title 10 U.S.C. §3204(a)(1) as implemented in FAR 6.302-1(a)(2)(iii)(A), Substantial duplication of cost to the Government that is not expected to be recovered through competition; and as implemented in FAR 6.302-1(a)(2)(iii)(B) Unacceptable delays in fulfilling agency requirements. The modification will result in a new ceiling value of $220,000,000.00. The approval is subject to availability of funds, and provided that the services and property herein described have otherwise been authorized for acquisition.

[redacted]

[redacted]