FEDERAL SUPPLY SCHEDULE LIMITED-SOURCES JUSTIFICATION

Acquisition Title: Cloud Onboarding, Migration, Engineering, and Training (COMET)
Agency: Centers for Medicare & Medicaid Services
Acquisition Year: 2026
Author: [redacted]

1. Description of Action:

Nature

☐ New Requirement
☒ Follow-On Order
☐ Modification of Existing Purchase Order / Contract Number

Contract Type

☐ Firm-Fixed Price
☒ Time and Materials
☐ Cost Plus Fixed Fee (CPFF)
☐ Term
☐ Completion
☐ Cost Plus Award Fee (CPAF)
☐ Other:

Total Projected Cost / Price: $30,746,596.00
Funding Source (s): IUSG - 000031
[redacted]

Name of Proposed Contractor(s): Samtek, Inc
Street Address: 24288 Lilys Nes Lane
City, State, Zip: Aldie, VA 20105

2. Description of Supplies or Services:

The Cloud Onboarding, Migration, Engineering, and Training (COMET) program serves as the primary accelerator for migrating and onboarding applications into the CMS Cloud. COMET provides technical support, guidance, and upskilling to CMS Business Owners and Application Development Organizations (ADOs), supporting CMS's Data Center Consolidation and Modernization initiative.

The current contract is a GSA Federal Supply Schedule task order (47QTCA21D00C5/75FCMC22F0062) awarded to Samtek, Inc., with a total period of performance from June 1, 2022, to May 31, 2026, with total financial obligations to date of [redacted]. This justification seeks a 12-month extension with two parts as shown below.

Extension phases:

- **Phase 1:** June 1, 2026 - August 31, 2026 (3 months)
- **Phase 2:** September 1, 2026 - May 31, 2027 (9 months)
- **Total Extension:** June 1, 2026 - May 31, 2027 (12 months)

Authority:

☒:ORDER AGAINST FSS: Authority of the Multiple Award Schedule Program, Title III of the Federal Property and Administrative Services Act of 1949 (41 U.S.C. 251, *et seq*.); Title 40 U.S.C. 501, Services for Executive Agencies; and Section 803 of the National Defense Authorization Act of 2002 (PL 107-107) and implemented by GSAM 538.7104-3. Mark the applicable exception and for each discuss how the cited authority applies in accordance with GSAM 538.7104-3.

☐ An urgent and compelling need exists, and following the procedures would result in unacceptable delays (GSAM 538.7104-3(b)(i)));

☐ Only one source is capable of providing the supplies or services required at the level or quality required because the supplies or services are unique or highly specialized (GSAM 538.7104-3(b)(ii)));

or

☒ In the interest of economy and efficiency, the new work is a logical follow-on to an original Federal Supply Schedule order provided that the original order was placed in accordance with the applicable Federal Supply Schedule ordering procedures. The original order or BPA must not have been previously issued under sole-source or limited sources procedures (GSAM 538.7104-3(b)(iii));

A 12-month extension is required to ensure continuity of hybrid cloud engineering operations while CMS finalizes requirements development for a follow-on contract that will support CMS' needs in this context. CMS is executing a multi-cloud diversification initiative spanning AWS Outpost, Azure Commercial, Google Cloud Platform (GCP), and Oracle Cloud Infrastructure (OCI). Samtek possesses specialized expertise in CMS's cloud architecture, security requirements, and integration protocols that cannot be immediately replicated by a new contractor without significant risk of service disruption, increased costs, and delays to mission-critical systems. Introducing a new contractor at this stage would jeopardize the stability of CMS's hybrid cloud environment and require additional Government and contractor resources to manage the transition. While Samtek's expertise in this context is not unique, the experience they have gained as the contract incumbent makes them best situated to provide the needed services while these non-recurring efforts are completed. The planners anticipate a follow on contract will be in place and work transitioned by the end of the one-year period of extension contemplated herein.

or

☐ An item peculiar to one manufacturer can be a particular brand name, product, or a feature of a product, peculiar to one manufacturer). A brand name item, whether available on one or more schedule contracts, is an item peculiar to one manufacturer. (GSAM 538.7104-4);

3. **Market Research:**

Market research was conducted through analysis of current contract performance and transition risk assessment. Samtek, Inc. is performing at a very good to exceptional level, demonstrating unique expertise in CMS's cloud architecture, security requirements, and integration. Formal additional market research would not alter the determination that extending the current contract is the most economical and efficient approach.

4. **Actions to Increase Competition:**

This follow-on order was originally awarded through fair opportunity procedures and was not previously issued under sole-source or limited-source procedures, satisfying GSAM 538.7104-3(b)(iii)). Upon completion of this extension, CMS anticipates a competitive award to provide future services of the sort described herein.

5. **Any other facts supporting the justification:** Not Applicable (N/A)

Approvals:

1. **Program Office Certification:** This is to certify that portions of this justification have been developed by the undersigned program office personnel, including supporting information and/or data verifying the Government's minimum needs, schedule requirements and other rationale, which form the basis for this Limited Source Justification.

[redacted] -S
Date: [redacted]

Contracting Officer Representative (COR) / Date

[redacted]

Program/Project Manager (P/PM) / Date

2. **Contracting Officer Certification and Best Value Determination:**
This is to certify that the justification for the proposed acquisition has been reviewed and that, to the best of my knowledge and belief, the information and/or data provided to support the rationale and recommendation for approval is accurate and complete.

By my signature below, after reviewing the relevant documents, I have determined that the order subject to this Limited-Sources Justification represents the best value for the Government as set forth in GSAM 538.7104-3, and constitutes a fair and reasonable price. The basis for my determination is as follows:

[redacted]
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r / Date

3. **CMS Competition Advocate Approval**
I hereby confirm the circumstances described above apply and approve the Limited Source Justification.

[redacted]

Name / Date

4. **Head of Contracting Activity (HCA) Approval**
I hereby confirm the circumstances described above apply and approve the Limited Source Justification.

[redacted]

Name / Date

5. **Office of Small and Disadvantaged Business Utilization**

N/A

Name / Date

6. **OGC Legal Review**

N/A

Name / Date

7. **HHS Competition Advocate Approval**
N/A

Name / Date

8. **Senior Procurement Executive (SPE) Approval**
Based on the foregoing justification, I hereby confirm the circumstances described above apply and approve the Limited Source Justification.

N/A

Name / Date