JUSTIFICATION AND APPROVAL FOR OTHER THAN FULL AND OPEN COMPETITION
(41 U.S.C. 3304(a)(1))

FY26-0114

Pursuant to the requirements of the Competition in Contracting Act (CICA) as implemented by the Federal Acquisition Regulation (FAR) 6.103 (FAR Class Deviation 25-11[1]), and in accordance with the requirements of RFO 6.104, the justification for the use of the statutory authority under RFO 6.103 is justified by the following facts and rationale required under RFO 6.104-1 as follows:

1. **Agency and Contracting Activity.**

   The Department of Homeland Security (DHS), Office of Procurement Operations, proposes to extend a task order on a basis other than full and open competition.

2. **Nature and/or Description of the Action being Approved.**

   (a) Nature of action. DHS intends to extend support services under task order 70RSAT23FR0000025 by eight months on a sole source basis.

   (b) Name and address of the contractor. Noblis, Inc.
   2002 Edmund Halley Drive, Reston, VA 20191

   (c) Contract type. Time and Materials

   (d) Estimated total value (including options).

Period	Period of Performance		Unit Price	Total
Base	05/18/2023 – 05/17/2024	12 mo.		$6,158,427.38
Option Year 1	05/18/2024 - 05/17/2025	12 mo.		$5,331,687.28
Option Year2	05/18/2025 - 06/02/2026	12.5 mo.		$5,985,122.84
Extension	06/03/2026 - 02/02/2027	8 mo.	$2,107,776.00	$2,107,776.00
Total Obligation				$8,073,397.94
Total Task Order Value				$17,475,237.50

[1] In this document, citations to RFO Parts 6, 10, 15, 25 are citations specifically to FAR Class Deviation 25-11 for FAR Part 6, FAR Class Deviation 25-06 for FAR Part 10, FAR Class Deviation 26-08 R1 for FAR Part 15, and FAR Class Deviation 25-09 R1 for FAR Part 25, which were issued as part of the Revolutionary FAR Overhaul (RFO), implemented in response to Executive Order 14275, *Restoring Common Sense to Federal Procurement*, signed April 15, 2025.

(e) Type of funding. Infrastructure Investment and Jobs Act funds

(f) Year of funding. FY2022 five (5) Year (I2) Funds

(g) Solicitation number. 70RSAT22R00000043

(h) Background information about the requirement.

This modification to the existing task order includes labor, travel, and supplies necessary to provide scientific and technical expertise, analysis, and program execution support to diverse scientific mission areas of the Science and Technology Directorate's (S&T) Critical Infrastructure Security and Resilience Research (CISRR) program.

3. **Description of Supplies/Services.**
The DHS S&T Critical Infrastructure Security and Resilience Research (CISRR) Program Systems Engineering and Technical Assistance (SETA) support task order provides subject matter experts in the areas of systems engineering, program management, technical analysis, and research and development in the following topic areas:
   - 1) Special Event Risk Assessment Ratings (SEAR) Tools
   - 2) Electromagnetic Pulse (EMP) and Geo- magnetic Disturbance (GMD)
   - 3) Positioning, Navigation, and Timing (PNT)
   - 4B) Soft Target Security
   - 5A) Telecommunications Equipment
   - 5B) Industrial Control Systems (ICS)
   - 5C) Open-source Software (OSS)

These services strengthen CISRR's ability to enhance capabilities that safeguard the American people, our homeland, and our values through the development of best practices and innovative technologies/techniques that secure the Nation's physical and cyber-critical infrastructure systems from a variety of natural and manmade threats.

4. **Identification of Statutory Authority Permitting Other Than Full and Open Competition.**

The statutory authority permitting other than full and open competition is 41 U.S.C. 3304(a)(1) implemented by the FAR Subpart 6.103-1 (FAR Class Deviation 25-11) entitled "Only One Responsible Source and No Other Supplies or Services Will Satisfy Agency Requirements."

5. **Demonstration that the proposed contractor's unique qualifications or the nature of the acquisition requires use of the authority cited**.
   (a) Rationale for using the authority cited in section 4 of the Justification and Approval (J&A). CISRR requires an eight-month extension of the period of performance for SETA support under task order 70RSAT23FR0000025 through February 2, 2027. This eight-month extension allows the critical services to continue during the development of the Market Research

Report, analysis of Request for Information results, and Head of Contracting Activity (HCA) approval of the acquisition strategy The Federal Government shutdowns in FY26 have drastically impacted the Government's ability to recompete the ongoing requirement.

There is no viable mechanism to staff this 8-month requirement competitively. This current contractor team has been supporting the program for the last three years and changing performers now would interrupt progress of ongoing projects and result in loss of situational knowledge without a proper transition. The current performer also has cleared and suitability approved staff onboard and equipped with DHS S&T Government furnished equipment to enable continued support through to the existence of the planned competitive award.

This extension is a change to the period of performance and total obligation only, the total task order ceiling value of $17,475,237.50 will remain unchanged. The total obligation will increase to $10,181,173.94.

(b) Details covering what events lead to the situation requiring use of other than full and open competition procedures including whether any portion of the work can be segregated to allow for competition.
The planned, competitive follow-on vehicle was delayed by the cumulative 22 weeks of lost productive engagement between October 1, 2025 and April 30, 2026 due to DHS budget lapse and furlough and will not be in place prior to the extended expiration date of the task order. This extension will allow DHS S&T to continue to obtain mission critical services while conducting the recompete and award. and will allow for a methodical transition to the new contractor, eliminating risks to programmatic success from loss of resident knowledge or a rushed transition.

(c) Summarize alternatives considered and why they will not work.
S&T considered attempting to cover support through leverage of other S&T-owned scientific and technical support contracts, but the depth and breadth of support needed far surpassed the available labor hours and labor categories held in aggregate through those other contracts and task orders. As such, an extension of the existing award is most prudent to allow the recompete to be awarded and a methodical transition to occur.

(d) Impact to the mission that would result if the J&A is not approved and, consequently, the product or service not provided.
Noblis provides critical scientific and technical programmatic support to CISRR projects and activities. S&T would endure significant risk in deploying technological solutions to DHS operational components if CISRR had to shift to a new contractor at this juncture. Current CISRR projects require ongoing support that would require time to overcome a significant learning curve, and the following projects cannot afford to be interrupted to support a SETA contract transition prior to completion of the planned recompetition.

- FIFA World Cup will run from June 11, 2026, to July 19, 2026, and span eleven (11) US cities. With the first game less than one month away, situational knowledge and continuity of planning efforts is crucial to a safe and successful event. CISRR efforts for this event require the SETA contractor to assist with deploying and monitoring physical security and video analytics technologies.
- Cross-Border communications experiment, with International partner Defence Research

and Development Canada, will take place in winter 2026, less than 9 months away Training guides, fact sheets, use cases, job aids, and instructional materials Formal commitments by both countries to allocate adequate time and resources are in place, and success relies on both countries to execute without incident and on schedule. SETA support for this effort includes experiment planning and collaboration with technical SMEs from all partners to ensure interoperability between the networks and devices leveraged in the experiment. SETA will also provide technical, logistical, and communication support on site during the entire experiment execution period. Losing technical support during this crucial time of planning would likely result in schedule failure and increased costs to execute.

- O-RAN Alliance Working Group Contributions project with US government partner National Institute of Standards and Technology (NIST) has ongoing work through September 2026. By the time new support was to transition-in and the learning curve was overcome, the project would be over. SETA support for this effort includes technical consultation of research, O-RAN Alliance engagement, and contributions specific to DHS' needs.
- Tool is currently in development with a planned completion date of September 2027. SETA support for this effort includes testing the usability, running simulations, extracting screenshots, and capturing notable anomalies within the application. Without this support the project will likely lose traction on efforts to improve the application, and obtain the mission critical technical feedback necessary to ensure the transition product meets the standards of the program and S&T.
- Tool is currently underway with a planned completion date of January 2027. SETA support for this effort includes testing the usability, running simulations, extracting screenshots, and capturing notable anomalies within the application. Without the continuity ensured by the existing SETA team, the execution of bug fixes necessary to ensure a full transition to CISA is impacted. Current SETA understand how to work within the restraints of DHS to ensure effective transition to CISA.
- Quality control test and evaluation will continue between now and September 2027. SETA support for this effort includes testing the usability, as well as, perform quality control evaluations on supporting documentation such as training guides, fact sheets, use cases, job aids, and instructional materials. Without up-to-date planning tools, event planners and first responders cannot safely and effectively plan for large scale events
- Support the Establishment of testbed for real-time alerting and monitoring. A new SETA team would lack the understanding or ability to effectively take over in progress activities necessary to ensure the execution of the deployment and related research and development activities.
- Support the implementation of a PNT resilient pilot, which is currently in the acquisition process and will continue for 24 months once awarded. SETA support for this effort includes providing technical and strategic advisory services; reviewing and providing technical analysis to the government on reports and technology; advising on and supporting contributions to applicable industry standards; and collaborating with other technical SMEs. Without this support, the project would not have the technical expertise to successfully execute the pilot.

- Details on the specific requirements.
  Critical scientific and technical expertise, analysis, program coordination and execution to support the diverse scientific mission areas of S&T's CISRR program and its topic

areas.

Noblis provides a vast range of scientific and technical support across communications and network systems; cybersecurity; software development and quality assurance; position, navigation, and timing; network architecture; systems engineering; industrial control systems; data science and analytics; modeling and simulation; artificial intelligence; machine learning; autonomous systems; explosives; physics; counterterrorism; psychology; electrical engineering; and chemical engineering.

- Information on why only one contractor is capable of fulfilling the requirements.

  The planned competitive award was delayed due to the FY26 government shutdowns and will not be in place prior to the expiration of this task order extension. The existing task order needs to be extended to maintain continuity of critical mission support to current projects during the competitive process and transition to a new contractor. There is no viable competitive mechanism to assemble a team to fulfill critical SETA support service requirement in the next 8 months. The current Noblis team is comprised of 11 individual SMEs across 9 scientific and engineering and technology support disciplines. These individuals fulfill requirements in 5 professional labor categories, many at the highest level of expertise and experience. Most importantly, the members of the existing Noblis team, including its key managers, have the necessary and unique knowledge of the near term S&T project deliverables and objectives to be able to fulfill the project schedules over the next 8 months. Time constraints on mission critical deliverables in the above listed projects require the immediate and continuing services of the existing Noblis team in order for S&T to meet its mission deliverable commitments for events from June 2026 to February 2027 would require other than full and open competition contracting actions, and would include the added need for a transition between performers.

- Why other proposed contractors are unable to meet the requirements.
  The requirement will be competed openly, likely through GSA OASIS+, and this task order extension will enable award and transition to that new contract and contractor. The current performer provides a vast range of scientific and technical support across communications and network systems; cybersecurity; software development and quality assurance; position, navigation, and timing; network architecture; systems engineering; industrial control systems; data science and analytics; modeling and simulation; artificial intelligence; machine learning; autonomous systems; explosives; physics; psychology; counterterrorism; electrical engineering; and chemical engineering. The contractors supporting CISRR projects have extensive experience in the application of these scientific and technical expertise to the broad and specific mission areas DHS operational components engage in. Other contractors could not assemble the personnel with the range of expertise and experience described above that are necessary to support CISRR projects without significant programmatic risk of failure to develop and deliver solutions to DHS components.

- Unique capabilities or qualifications of the contractor that form the basis for the justification.
  The contractor has been supporting CISRR programs consistently for the last three (3) years, and has all of the necessary scientific and technical expertise, mission area

experience, and cleared and suitability-approved staff onboard and equipped with DHS S&T Government furnished equipment (as described above) to enable continued support through to the existence of the new recompeted contract. Replacing contractor support to CISRR programs in the middle of the RDT&E programs they're supporting, without substantial transition periods to ensure all the incumbent program, customer, and technological knowledge is able to be ingested and deployed by the new contractor would lead to programmatic failure - or at the very least significant delay. With CISRR solutions being deployed to DHS operators, this breakdown would result in delayed enhancement to DHS operations at best, and risk to DHS personnel at worst.

- Information on why and description of the extent to which the Government will be harmed if the supply or service is not acquired from that vendor.
  The lapse in support to CISRR's programmatic portfolio would lead to extreme detriment to CISRR's ability to provide the technology solutions being developed and transitioned to DHS operational components and the interagency. Interrupting or removing these services from CISRR would drastically slow analytical production, reduce technical continuity, and increase strain on Federal staff. Without these services, institutional and technical knowledge would be lost, quality control processes weaken, project timelines slip, and surge capacity during emerging threat events would be drastically reduced. Additionally, discontinuing these services without a transition increases the risk of failure to secure national security events, like FIFA World Cup, from June 2026 to February 2027. Although Federal staff retain decision authority, the loss of these services would diminish execution capacity and degrade CISRR's ability to increase the security of critical infrastructure.

6. **Description of Efforts Made to Ensure that Offers are Solicited from as Many Potential Sources as is Practicable.**
   A synopsis was posted on SAM.gov May 13, 2026. Any potential sources will be addressed accordingly.

7. **Determination by the Contracting Officer that the Anticipated Cost to the Government will be Fair and Reasonable.**

   The Contracting Officer determines that the anticipated price will be fair and reasonable based on task order history past performance, and similar existing contracts as held throughout DHS S&T.

8. **Description of Market Research.**

   (a) S&T continues to analyze the market research that it initiated in Fall 2025 for the recompete of SETA support services. While no separate RFI was specifically issued for this extension, the program has used the market knowledge obtained thus far to identify eight months as the time required for the government to conduct a recompetition of SETA requirements and for competing teams to assemble. The eight-month period provides adequate time for the government to prepare its strategy and for interested parties of all types (including small businesses) to respond fully to the government's

needs.

(b) S&T is currently finalizing market research for a competitive recompete of these support services. This eight-month extension allows the critical services to continue during the development of the Market Research Report, analysis of RFI results, and Head of Contracting Activity (HCA) approval of the acquisition strategy. The Federal Government Shutdowns in FY26 have drastically impacted the Government's ability to conduct market research for the recompete. The RFI for the recompete of these services received 115 responses. Of those submissions, four responses were determined to have high potential capability in fulfilling the requirement, all of which were from large businesses, including Noblis. Four additional responses were determined to have some capability and were a mixture of sizes. For the highly capable responses, other than Noblis, no other company has the ability to seamlessly support the ongoing programs and projects of MCS on June 3, 2026 without a significant gap for transition, onboarding, and overcoming the very steep learning curve

(c) No patents, copyrights, and/or intellectual property are applicable to this extension.

9. **Any Other Facts Supporting the Use of Other Than Full and Open Competition.**

No other facts are applicable.

10. **A Listing of the Sources, if Any That Expressed, in Writing, an Interest in the Acquisition.**

No sources other than the proposed sole source contractor have expressed an interest in this acquisition in writing. The May 13 release of the synopsis was the only agency notice of plans for the 8-month extension and no response to the synopsis has been received.

11. **A Statement of the Actions, if Any, the Agency May Take to Remove or Overcome Any Barriers to Competition Before Any Subsequent Acquisition for Supplies or Services Required.**

(a) The Government does not have any overly technical specifications or acquired data rights.

(b) Comprehensive market research is underway for the recompete, and the acquisition strategy will require HCA approval. Detailed analysis of Request for Information (RFI) results will aid in finalizing the acquisition strategy and identifying potential offerors.

Market research is expected to be finalized by early June 2026 and award of the recompete is expected by the end calendar year 2026. This will allow for transition to the new contract to take place in early 2027.

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12. Contracting Officer's Certification. I certify that the data supporting the recommended use of other than full and open competition is accurate and complete to the best of my knowledge and belief.

    /s/ Contracting Officer

13. Technical/Requirements Personnel Certification. I certify this requirement meets the Government's minimum need and that the supporting data, which forms a basis for this justification, is complete and accurate.

    /s/ Technical Representative

    APPROVAL:

    /s/ Procuring Activity Advocate for Competition