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

FY26-0108

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 an extension to task order 70RSAT23FR0000022 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 70RSAT23FR0000022 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

[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.

(d) Type of funding. Research, Development and Innovation (RD&I) Funding

(e) Year of funding. FY24 and FY25 three (3) year RD&I Funds (J4 and J5)

(f) Solicitation number. 70RSAT23R00000011

(g) 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) Office of Mission and Capability Support (MCS) and Program Executive Office for Drones and Countering Unmanned Aerial Systems (PEO CUAS).

3. **Description of Supplies/Services.**

The task order provides critical scientific and technical expertise, analysis, program coordination and execution to support the diverse scientific mission areas of MCS. The services support the efficient and effective execution of a matrixed portfolio of Research, Development, Test and Evaluation (RDT&E) in support of S&T customers and enables S&T-developed technology transitions to its customers and drive operational success across the Department and larger Homeland Security Enterprise to include facilitation of the deployment of prototypes, technologies, and support to the 2026 FIFA World Cup and America 250 celebrations.

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 J&A.
S&T MCS requires an eight-month extension of the period of performance (POP) for SETA support task order 70RSAT23FR0000022 through February 2, 2027. This eight-month extension allows the mission critical services to continue during the development of the Market Research Report, analysis of Request for Information results, Head of Contracting Activity (HCA) approval of the acquisition strategy, solicitation, evaluation of proposals, and award of the recompete. There are critical ongoing projects which cannot be successfully coordinated, implemented, or completed without the support under this task order. The scientific and technical experts providing support to MCS programs provided by Noblis cannot be replicated by another contractor without significant mission impact, particularly in support of high priority and time-sensitive projects in summer 2026, including the FIFA World Cup and America 250 celebrations.

MCS programs are currently developing and transitioning technology solutions to DHS operators across the Department's missions, with strong engagement in administration priorities such as border security and immigration enforcement. The contractor provides critical expertise that's integral to understanding how technology systems are built, how they're performing, and providing assistance to the government on ensuring that systems meet operational requirements. This expertise spans traditional scientific (chemical, biological, nuclear, physics) and technical (electrical engineering, autonomous systems, software development, test and evaluation, data science, artificial intelligence/machine learning) domains and applies across DHS mission areas (non intrusive inspections, baggage/cargo/people screening, counter-drone, cybersecurity, maritime domain awareness) in ways that cannot be replicated by Federal staff or commercial sources without a significant and time-intensive learning curve.

This extension is a change to the period of performance and total obligation only.

(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.
Due to the nature of the work, no portion of this requirement can be segregated to allow for competition at this juncture. S&T has been diligently pursuing competition of the follow-on to this existing task order through full and open competition under GSA's OASIS+ strategic sourcing vehicle. The original timeline would have enabled award and transition to the new performer well in advance of the completion of this existing task order period of performance. Due to unforeseen delays owing to the Federal Government Shutdowns in FY2026, S&T lost approximately 22 weeks of productive engagement between October 1, 2025 and April 30, 2026 and as a result the recompete is not yet awarded.

(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 continuation of mission critical scientific and technological support while the recompete is implemented and the new contract 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.
The lapse in support to S&T's programmatic portfolio would lead to extreme detriment to S&T's ability to provide the technology solutions being developed and transitioned to DHS operational components and interagency partners?, and would markedly increase the risk to the safety of the general public and the protection of property due to the inability to fully support 2026 FIFA World Cup and America 250 celebration events.

- Details on the specific requirements.
  Critical scientific and technical expertise is required; this includes analysis, program coordination and execution to support the diverse scientific mission areas of S&T's Office of Mission and Capability Support. The services support the

efficient and effective execution of a matrixed portfolio of Research, Development, Test and Evaluation in support of S&T customers and enables S&T-developed technology transitions to its customers and drive operational success across the Department and larger Homeland Security Enterprise to include facilitation of the deployment of prototypes, technologies, and support to the 2026 FIFA World Cup and America 250 celebrations.

- Information on why only one contractor is capable of fulfilling the requirements.
  The existing task order needs to be extended to allow for the award and transition to a new vendor under the recompeted task order being pursued through GSA OASIS+. There is no viable competitive mechanism to assemble a team (including recruitment of talented individuals and business partners) to fulfill critical SETA support service requirement in the next 8 months. The current Noblis team is comprised of many dozens of individual SMEs across the broad array of scientific and engineering and technology support disciplines listed herein. These individuals fulfill requirements in carefully organized project and task teams involving many professional labor categories 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. As explained in the market research section below it is not possible for another commercial source to assemble a team capable of meeting the government's needs over the next eight months at the level of organization, knowledge and skill that Noblis possesses, Noblis provides critical scientific and technical programmatic support to MCS RDT&E projects and activities. S&T would undertake significant risk in deploying technology solutions to DHS operational components if MCS had to shift to a new contractor at this juncture.

- Why other proposed contractors are unable to meet the requirements.
  The requirement will be competed openly through GSA OASIS+, and this task order extension will enable award and transition to that new contract and performer. The contractor provides a vast range of scientific and technical support across communications and network systems; cybersecurity; software development and quality assurance; computer and information analysis; network architecture; programming; database design; information science research; data science and analytics; quantum computing; biometrics; identity access and management; modeling and simulation; artificial intelligence; machine learning; autonomous systems; explosives; engineering; physics; biology; virology; chemistry; geoscience; mathematics; and civil engineering. The contractors supporting MCS programs 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 readily supply the volume of personnel with the range of expertise and experience necessary to support MCS programs without significant programmatic risk of failure to develop and deliver solutions to DHS components.

  MCS programs have the following activities, among others, requiring Noblis subject matter expertise and contractor support for successful completion between June 2026 and January

2027:

- Test and evaluation on canine detection of shoe bombs for TSA pre-check taking place in June 2026.
- World Cup Levi's Stadium VANTAGE deployment (June-July 2026 to support FIFA) with plans to remain installed thereafter to serve as a testbed. Algorithm updates in July 2026 – beyond based on feedback from both operational deployments.
- Finalizing the development and transition of a search and rescue-oriented counter-UAS technology for use by DHS components and first responders in June 2026.
- VANTAGE (video analytics) deployment to Ronald Reagan Building beginning in June 2026 which will require ongoing support and maintenance through December 2026.
- Border security-aligned projects, including unmanned systems integration in October 2026, advanced surveillance technology deployments in September 2026, and persistent Intelligence, Surveillance, and Reconnaissance enhancements in December 2026 are scheduled for completion and transition to component customers.
- Final developmental testing & evaluation (DT&E) for Bruker trace-detection systems at TSL in June 2026 to be supported by SETA personnel.
- Test & evaluation on canine detection capabilities of non-declared lithium-ion batteries for TSA, DOT, and FAA in July 2026.
- Millimeter Wave Wand demo and evaluation at the Transportation Security Lab scheduled for June-July 2026.
- Data from a May biometric collection field testing event will be analyzed for identification effectiveness capabilities. Conclusions will be presented to CBP to enable informed procurement of biometric technologies at pedestrian exits at ports of entry once analysis is complete, in late summer 2026.
- Support FIFA CUAS setup, operations, and stand down, including CONOPS refinement, technical support to sensors/effectors/C2, and an after action report to inform future S&T CUAS investments between June and August 2026.
- Test and evaluation of breathing-zone air purifier technology to protect vehicular occupants from airborne contagions between June and August 2026.
- Data collection for a new, next-generation RF sensor type for screening through bags at TSL between June and December to be supported by SETA personnel.
- 5 exercises in coordination with FBI, ATF, and other stakeholders, (1) downed UAS for bomb technicians and tactical teams, (2) portable x-ray evaluations, (3) mesh networking systems, (4) technology evaluation for ICE/HIS special response teams. (5) Armored vehicles evaluation, (6) chemical agent delivery systems, (7) bomb tech/SWAT integration experimentation scheduled between June 2026 and January 2027.
- Region of Responsibility (ROR) stakeholders meeting bringing performers and partners to one location to review the current and future of ROR work, which provides the technical underpinning for x-ray detection standards at TSA and numerous other organizations. Scheduled between August and September 2026.
- Evaluations on canine detection capabilities for nitro-methane (jet fuel) for TSA. Between September and October 2026.
- Design, execute, and analyze the December Kinetic 4 test (objectives, scenarios, MOP/MOE, instrumentation, data collection, and reporting) and integrate results into CUAS roadmaps and acquisition/decision support products scheduled between September and December 2026.

- Conduct operational planning for Olympics 2028 by converting FIFA lessons learned into CUAS requirements, playbooks, venue specific threat/coverage analyses, and a planning package for operational partners between October and December 2026.
- Finalizing development and conducting test and evaluation of novel fentanyl vapor and particle detection technology that will enable near real-time, standoff detection of fentanyl and related compounds between November and December 2026.

- Unique capabilities or qualifications of the contractor that form the basis for the justification; and
  The contractor has been supporting MCS programs consistently for the last six years and has all the necessary scientific and technical expertise, mission experience, and 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 new recompeted contract. 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 S&T's programmatic portfolio would lead to extreme detriment to S&T's ability to provide the technology solutions being developed and transitioned to DHS operational components and the interagency, and would markedly increase the risk to the safety of the general public and the protection of property due to the inability to fully support operational security at the 16 host cities of the 2026 FIFA World Cup and the national special security events (NSSE) related to the America 250 celebration in DC and other sites. Replacing contractor support to MCS 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 significant slippage in support to critical events in summer 2026 and delay critical operational planning for the LA Olympics in 2028. With MCS 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.

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 on May 12, 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) For the award of the base task order, the program office conducted a comprehensive review of recent prior task orders issued under the SETA III IDIQ. This included analysis of the most current task orders to gain a detailed understanding of the individual components' needs, which informed the conceptualization of the size, scope, magnitude, and complexity required for the MCS task order. Additionally, historical knowledge regarding the efficacy of previous contract vehicles was gathered from former S&T Contracting Officers familiar with SETA II and SETA III. Comparative analysis was performed between SETA I's single award BPA methodology and the multiple award contract methodologies of SETA II and SETA III. Discussions with various S&T components were also held to identify lessons learned and evolving program requirements.

The market research provided valuable insights into component-specific requirements, historical contract performance, and administrative efficiencies. It highlighted the need for a flexible and scalable contract solution to address evolving program needs. The research also identified lessons learned from previous contract vehicles, which informed the development of the MCS requirement.

(b) 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.

(c) MCS 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 Request for Information (RFI) results, Head of Contracting Activity (HCA) approval of the acquisition strategy, solicitation, evaluation, award and transition to the new vehicle for these services. 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

(d) 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.**

   There are no other facts supporting the Use of Other Than Full and Open Competition.

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 12 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