JUSTIFICATION AND APPROVAL FOR OTHER THAN FULL AND OPEN COMPETITION

(41 U.S.C. 3304(a)(1))

FY26-0107

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, 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 70RSAT23FR0000088 by nine months on a sole source basis.

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

   (c) Contract type. Time and Materials

   (d) Estimated total value (including options).

Period	Period of Performance		Unit Price	Total
Base	09/012023 - 08/31/2024	12 mo.		$1,331,981.86
Option Year 1	09/01/2024 - 09/14/2025	12.5 mo.		$2,583,923.94
Option Year2	09/15/2025 - 06/02/2026	8.5 mo.		$1,990,201.20
Extension	06/03/2026 - 03/02/2027	9 mo.	$864,163.80	$864,163.80
Total Obligation				$4,254,716.94
Total Task Order Value				$5,906,107.00

[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. Research, Development and Innovation (RD&I) Funding

(f) Year of funding. FY25 three (3)-year RD&I Funds (J5)

(g) Solicitation number. 70RSAT23R00000029

(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 for the Science and Technology Directorate's (S&T) collaboration with Transportation Security Administration (TSA) efforts to improve security at airports and other venues as well as to significantly improve the overall travelling public experience with security screening.

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

The required services include technical and management support services around artificial intelligence/machine learning (AI/ML) efforts under Screening at Speed and partner programs including subject matter expertise, project and algorithm evaluation, and certification readiness support. This work supports the S&T Program's collaboration with TSA efforts to improve security at airports and other venues including World Cup and the Summer Olympics as well as significantly improving the overall travelling public experience with security screening. The work includes delivering essential tools, data and analyses of security screening systems and methods at various stages of the developmental lifecycle, including those in development and more advanced prototypes undergoing rigorous test and evaluation. Without this extension progress towards delivering tools, analyses and prototypes for TSA will end, and resurrection of the work will require significant re-work and long delays.

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

The authority permitting other than full and open competition is 41 U.S.C. § 3304(a)(1), as implemented by RFO FAR 6.103-1(c)(2)(ii), "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.
The Screening at Speed program requires a nine-month extension of the period of performance for SETA support task order 70RSAT23FR0000088 through March 2, 2027. This nine-month extension allows the critical services to continue during the development of the Market Research Report, analysis of Request for Information (RFI) results, and approval of the acquisition strategy. There are critical ongoing projects which cannot be successfully coordinated, implemented, or completed

without the support under this task order. Noblis is currently supporting S&T on this task order and is uniquely qualified to continue performing this work uninterrupted. Noblis has the depth of knowledge and the hands-on experience with screening security systems and their operation to complete the work and support needed under this extension as shown in the deliverables listed, including operational support of planned deployments in June and July of two immersive video systems at two World Cup events and one deployment of a radio frequency (RF) scanning system at a 250th event National Mall. Noblis has demonstrated expertise to do this work without interruption including 1) supporting and creating algorithm training, validation and testing, and assurance tools, 2) doing independent evaluations of data sets collected by Program performers and 3) interpreting architecture data, and 4) developing algorithm metadata standards. Noblis provides the data science expertise needed along with chemists, physicists, system engineers, and statistical data analysis experts and analysts who bring an understanding of the underlying physics, chemistry, and transition strategies associated with the many different sensors applicable in a variety of ways to support development and transition of specific screening technologies for delivering new technology through the Screening at Speed program to meet TSA's demanding screening requirements. The people Noblis provides to do this work have many years of hands-on experience with TSA security applications including 1) developing, testing, validating of AIML and data science techniques to algorithm development, and 2) development, testing, and evaluation of advanced passenger and baggage screening technologies. And all Noblis's personnel being tapped for this work have DHS fitness clearance, and many have Top Secret (or higher) clearance.

Noblis has deep technical expertise providing strategic data science support to the Screening at Speed program and specifically their work with unusual technologies such as X-ray diffraction and transmission systems, synthetic data generators, millimeter wave, RF, and terahertz systems**.** During this extension deployments are underway with S&T and TSA as joint stakeholders to increase the security posture at the respective event locations leveraging the respective systems' current capabilities. The Noblis work is supporting those deployments include monitoring algorithm performance and making corrections as needed in real time and ensuring the data collection is following collection standards. Several other systems are in the middle of data collection, algorithm testing, and validation at the Transportation Security Laboratory (TSL) and at the TSA Systems Integration Faculty (TSIF) including a walk-by millimeter wave on-person screening system, an RF based personal bag screening system, a miniature X-ray computed tomography (CT) baggage screening system, and a hybrid CT/X-ray diffraction scanning system. All of these efforts will improve the public experience and safety at checkpoints and event venues in preparation for deployment at the 2028 Summer Olympics, and for acquisition readiness of new systems that will meet TSAs demanding requirements in time for TSA's FY28-30 recapitalization plan, and support the Department's efforts to promote public safety. This extension will ensure the Program will continue receiving these critical scientific, technical and engineering support services needed to avoid schedule and equipment storage cost impacts and avoid a significant and time-sensitive learning curve while a new single award contract completes acquisition planning, including market research, for a competitive recompete of these services.

This extension is a change to the period of performance and total obligation only, the total task order value of $5,906,107.00 will remain unchanged. The total obligation will increase to $5,118,880.74.

(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.

S&T has been pursuing a competition of the follow-on to this existing Task Order, through full and open competition, potentially under GSA's OASIS+ strategic sourcing vehicle. The original timeline would have enabled award and transition to the new contractor well in advance of the completion of this existing contract's period of performance. Due to unforeseen delays owing to the Federal Government Shutdowns in FY2026, S&T lost approximately 22 weeks of productive engagement and as a result the acquisition planning is not yet complete.

(c) Summarize alternatives considered and why they will not work.

S&T considered obtaining temporary support, to have the work covered by other S&T personnel, other S&T SETA, and from TSA, but the specialized expertise for these security developments, let alone available labor hours and necessary skills and labor categories, were virtually non-existent under other awards. As such, an extension of the existing award is most prudent action 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.

The lapse in support to S&T's programmatic portfolio would significantly impact TSA's expectations, with whom S&T is collaborating on these AI/ML efforts, and will lead to significant delays of test results, validations, and progress on these various systems and we will not be able to support the deployment of a two different security systems with monitoring algorithm performance and making corrections as needed in real time and ensuring the data collection is following collection standards which risks the effectiveness of those respective deployments. Costs will significantly rise due to having to move and store equipment, and labor costs associated with a significant learning curve on multiple systems deploying different sensing modalities and the associated algorithms.

- Details on the specific requirements.

Critical security-based artificial intelligence and machine learning as applied to security screening, algorithm development, test, evaluation, validation and systems analysis to support the S&T collaboration with TSA to bring solutions to TSA's screening and security needs are required. The services support enables S&T to collaborate successfully with TSA and to meet TSA's expectations for developing new solutions to meet their requirements including facilitation of the deployment and testing of capable working prototypes at 2026 FIFA World Cup venues, America 250 celebrations, and the 2028 Summer Olympics.

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

The current staff have developed extensive expertise in these specialized domains specific to

security screening systems across a variety of sensor modalities. The existing contract needs to be extended to allow for the award and transition to a new contractor under the recompete being pursued. Noblis provides critical AI/ML-based technical support to this S&T/TSA collaboration to develop screening solutions for TSA. S&T would endure significant risk in meeting TSA's expectations due to work stoppage right in the middle of critical testing on many different solutions undergoing test and validation and would lead to significant delays and cost impacts.

- Why other proposed contractors are unable to meet the requirements.

Noblis provides specific AI/ML experience and expertise in applying AI/ML methods to security screening technologies and their associated algorithms across all aspects of security solutions including data analysis, algorithm validation, synthetic image training sets, systems analysis, science of explosives detection for developing and prototyping security and screening solutions in collaboration with TSA. Other contractors could not readily supply personnel with this specialized expertise to be able to understand and work on the existing work without a significant learning curve and without significant programmatic risk of failure to develop and deliver to TSA's expectations.

- Unique capabilities or qualifications of the contractor that form the basis for the justification.

The contractor has been supporting the S&T/TSA collaboration with specific AI/ML expertise across many sensor modalities and scanning system configurations and use cases consistently for the last six years, and has all of the necessary AI/ML expertise and experience with the TSA security mission space 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. Replacing contractor support in the middle of the RDT&E work they are doing for the S&T/TSA collaboration,, 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 most likely interrupt the many different prototype solutions, testing, and validation work already underway, and cause significant cost and schedule overruns due to moving and storing equipment and learning curve delays, impacting TSA's expectations significantly.

- 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.

A gap in support to this S&T/TSA collaboration to bring security screening solutions across many modalities and a variety of security needs would lead to extreme detriment to S&T's to meet TSA's expectations from this collaboration. It would also impact ability to reduce risk to the safety of the general public and the protection of property due to the inability to make use of the security systems being fielded at two 2026 FIFA World Cup venues to increase the security posture of those locations at the World Cup soccer games in June and July and to screen people's carry bags for explosives faster and more effectively at an America 250 celebration near the National Mall that is being planned..

6. **Description of Efforts Made to Ensure that Offers are Solicited from as Many Potential**

Sources as is Practicable.

A synopsis was posted to 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) The program has used the market knowledge obtained thus far to identify nine months as the time required for the government to conduct a recompetition of SETA requirements and for competing teams to assemble. The nine-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.

The Screening at Speed program is currently finalizing market research for a competitive recompete of these support services. A Request for Information (RFI) closed on May 12, 2026 with robust responses from industry. This nine-month extension allows the critical services to continue during the development of the Market Research Report, analysis of RFI results, 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. An RFI was posted on 4/27/26 and closed on 5/13/26. 73 responses were received to the RFI and have been preliminarily reviewed. Four were not located in OCONUS or included so little information as to be effectively unresponsive. Some showed direct experience with supporting AI/ML efforts for prototype and emerging checkpoint screening solutions that are sponsored by the S&T Program but their staff would not be able to get up to speed and vetted to be able to execute the work in the timeframe needed. Many responders acknowledged having no experience in the aviation screening domain but offered in-house platforms or enterprise-wise AI/ML solutions that do not meet this requirement. Hence the market study concluded that the current contractor, Noblis, is the only contractor who can perform the work on this extension on June 3, 2026 without a significant gap for transition, onboarding, and overcoming the very steep learning curve.

(b) 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.

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 and the acquisition strategy will require approval. Detailed analysis of Request For Information (RFI) results will aid in finalizing the acquisition strategy.

Market research is expected to be finalized by late June 2026 and award of the recompete is expected by the end of 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/ Contracting Officer