J&A-26-0090

This justification is in accordance with Federal Acquisition Regulation (FAR) **16.507-7 (Class Deviation 26-04**, REV 1[1]**)**.

1. Agency and Contracting Activity.

The Department of Homeland Security (DHS), U.S. Immigration and Customs Enforcement (ICE), Office of Acquisition Management (OAQ) proposes to award a new delivery order on behalf of the Office of the Chief Information Officer (OCIO)/ Chief Data Officer (CDO) resulting from a solicitation containing a brand-name specification.

2. Nature and/or description of the action being approved.

(a) Name of the ICE, DHS, or Multiple-Agency Multiple Award Contract that the delivery/task order or modification is being placed under: National Aeronautics and Space Administration (NASA) Solutions for Enterprise-Wide Procurement (SEWP) V

(b) If applicable, identify the functional category, size category, or other sub-section of awardees which will be provided with a fair opportunity to be considered: Small Businesses Resellers

(c) Contract Type: Firm-Fixed Price

(d) Identify whether **new** action or **modification** to an existing action: New Action

(e) Dollar amount for this justification: [redacted]

(f) Title of the required brand-name manufacturer and product: Collibra Inc., Collibra Data Intelligence Software

(g) Type of Funding: One Big Beautiful Bill (OBBB)

(h) Year of Funding: Multi-Year 2025-2029

(i) Solicitation Number: 70CTD026Q00000029

[1] FAR Class Deviation 26-04 REV 1 is implemented as a result of Revolutionary FAR Overhaul, referred to as RFO, following Executive Order 14275, ***Restoring Common Sense to Federal Procurement***. All citations in this document follow applicable DHS RFO Deviations therefore are referred to as RFO.

(j) Background information about the requirement:

ICE relies on Collibra Data Intelligence software as the central enterprise platform for managing and governing mission-critical data used in investigative, enforcement, intelligence, and mission-support programs. The platform catalogs and classifies high-value data assets; maintains standardized business glossaries and shared definitions so that programs use consistent terms and metrics; documents data lineage for key data flows so reports and decisions can be traced back to their sources; and enables governed workflows for data stewardship, issue management, and access approvals. With the addition of data quality and artificial intelligence governance capabilities, the platform also provides continuous measurement and remediation of data quality issues and centralized registration, and oversight of artificial intelligence use cases. These capabilities are foundational to ICE's data governance framework and are needed to demonstrate compliance with Department of Homeland Security policy and federal requirements for data management and responsible use of artificial intelligence.

3. Description of Supplies/Services.

(a) ICE requires an enterprise data governance and management software platform that enables ICE programs to efficiently catalog, organize, and control data assets. Such a platform supports improved data integrity, transparency, and usability across ICE, directly affecting the quality of information used for investigations, enforcement actions, intelligence products, and mission-support activities. Continued access to this platform enables consistent metrics, trusted dashboards, and reliable data for operational and leadership decisions. By centralizing metadata and automating workflows, the software will support ICE in maintaining data integrity, facilitating secure information sharing, and enabling informed decision-making across operational and analytical functions. This enhances ICE's ability to manage large volumes of sensitive data, meet reporting requirements, and uphold data privacy and security standards critical to its mission.

(b) The period of performance will consist of one 12-month Base period and four 12-month option periods.

(c) Table: Period of Performance, Months, and Price

Period	Month	Total
Base	12 mos.	[redacted]
Option 1	12 mos.	
Option 2	12 mos.	
Option 3	12 mos.	
Option 4	12 mos.	
Total Original Value		

4. Statutory Exception and Rationale.

Exception:
The specific exception for providing for brand-name awards under multiple award contracts is RFO FAR Subpart 16.507-7(a). 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, even if available on more than one contract, is an item peculiar to one manufacturer. Brand-name specifications must not be used unless the particular brand-name, product, or feature is essential to the Government's requirements and market research indicates other companies' similar products, or products lacking the particular feature, do not meet, or cannot be modified to meet, the agency's needs.

Rationale:
(a) Describe the Government's requirement.
ICE has a requirement for a product that enables organization, governance, and improvement of data used to inform operations and decision-making. Without such a platform, ICE will lose a central capability for cataloging and classifying high-value data assets, standardizing definitions, documenting data lineage, monitoring data quality, and governing artificial intelligence use cases. This increases the risk of inconsistent reporting, reduced data quality, unmanaged artificial intelligence risks, and difficulty demonstrating compliance with departmental and federal data requirements.

(b) List the particular brand-name product, or feature and how it is essential to the Government's requirements.

Collibra Data Intelligence Platform is an industry leader in data governance, and its uniqueness lies in the comprehensive,approach to data governance, robust workflow and automation capabilities, broad integration options, and focus on enabling data intelligence and collaboration across the enterprise.

(c) Describe the recent market research that was conducted to support the brand-name requirement. Include the dates the market research was conducted.

Market research was conducted on January 2-6, 2026, by comparing the various data governance tools on the market to ICE's requirements.

Comparison of ICE Requirements to Collibra and Other Products

ICE Requirement	Collibra	IBM	Alation	Informatica	Can Other Products Be Modified to Meet Requirement?
Out-of-the-box workflows for data stewardship, policy approvals, access requests	Yes	NO	NO	NO	Requires custom development; may not be feasible
Catalog, glossary, policies, workflows in single interface	Yes	NO	NO	NO	Requires multiple modules; increases complexity
Standard connectors/APIs for federal data sources and identity systems	Yes	NO	NO	NO	Requires custom integration; increases risk
Fine-grained permissions, unified audit trails	Yes	NO	NO	NO	Requires additional components; increases complexity
Multi-domain, multi-organization enterprise deployment	Yes	NO	NO	NO	Requires multiple tools; not feasible
Leverage existing DHS investments, patterns, expertise	Yes	NO	NO	NO	No DHS experience; increases risk and cost
Minimize custom development, integration, sustainment burden	Yes	NO	NO	NO	Higher cost and schedule due to customization

During the research and evaluation process, multiple data governance platforms were considered for ICE's enterprise needs. ICE's requirements encompass a comprehensive set of standards, including functional capabilities, technical compatibility, security compliance, seamless integration with existing systems, scalability to support future growth, and total cost of ownership. These requirements are essential to ensure operational continuity, data consistency, and effective support across ICE's mission-critical functions.

Collibra is the only solution that fully satisfies all of ICE's requirements and standards without the need for extensive customization or acceptance of material capability gaps. In contrast, other platforms reviewed during the analysis either lacked critical features, failed to meet ICE's stringent security and integration requirements, or would require significant modifications to attempt compliance. Such modifications are not feasible, as they would introduce unacceptable risks, increase costs, and potentially compromise operational effectiveness.

Additionally, products that do not natively meet ICE's standards cannot be reasonably adapted or modified to bridge these gaps. Attempting to modify these products to meet ICE's requirements would undermine the integrity of ICE's data governance framework and jeopardize the agency's ability to maintain consistent, reliable, and secure data management practices. The technical limitations, security concerns, and operational risks associated with modifying alternative platforms make them unsuitable for ICE's enterprise environment.

Therefore, specifying Collibra as the enterprise data governance platform is necessary to ensure ICE's requirements are fully met and to maintain the high standards required for supporting ICE's mission-critical operations. Collibra's ability to deliver comprehensive functionality, seamless integration, robust security, and scalability—without the need for risky or costly modifications—makes it the only viable solution for ICE's enterprise data governance needs.

5. Determination by the contracting officer that the anticipated cost to the Government will be fair and reasonable.

Multiple NASA SEWP V, Small Business vendors provide brand name products. The Government has a reasonable expectation that at least two quotes will be received so the contracting officer will determine that price(s) will be fair and reasonable based on adequate price competition. The SEWP V contract achieves fair opportunity and competitive pricing by allowing all eligible contract holders to respond to delivery orders and quotes issued through the SEWP portal. The program requires agencies to solicit quotes from multiple vendors, ensuring that all contractors have an equal chance to compete for each requirement. SEWP V is fully compliant with Federal Acquisition Regulation (FAR) 16.505, which mandates fair opportunity for all contractors under multiple-award contracts.

6. Any other facts supporting the justification. None

7. A statement of the actions, if any, the agency may take to remove or overcome any barriers that led to the exception to fair opportunity before any subsequent acquisition for supplies or services is made.

ICE will continuously monitor the market and update its market research to identify any new products or vendors that may offer the required features. Prior to any subsequent acquisition, ICE will reassess available solutions to ensure that no unnecessary barriers exist and that all potential competitors are considered. If new products emerge that meet ICE's requirements, ICE will evaluate their suitability and adjust acquisition strategies accordingly. This approach ensures that ICE remains open to competition and removes any barriers to fair opportunity in future procurements.

8. OAQ intends to**:**

☒ Provide the justification and supporting documentation along with the solicitation to all Small Business resellers (contract awardees under the NASA SEWP V category in accordance with RFO FAR 16.507-7(c)(1)(ii).

9. Technical/Requirements Personnel Certification.

I certify that this requirement meets the Government's minimum need and that the supporting data, which form a basis for the Brand-Name Justification, are accurate and complete.

[redacted]

10. Contracting Officer Certification.

I hereby certify that the Brand-Name Justification is accurate and complete to the best of my knowledge and belief.

[redacted]

Contracting Officer

11. Approval: [redacted]

Procuring Activity Advocate for Competition Date