Control Number: 2025-29

JUSTIFICATION REVIEW DOCUMENT
FAR Part 16 Justification for an Exception to Fair Opportunity

Program/Equipment: Medical Center of Excellence (MEDCoE) Instructor/Multimedia Support (IMS) Multiple Award Task Order Contract (MATOC) at Joint Base San Antonio – Fort Sam Houston, TX.

Authority: Title 10 United States Code (U.S.C.) §3406(c)*(2)* as implemented in Federal Acquisition Regulation (FAR) 16.505(b)(2)(i)*(C)* The order must be issued on a sole-source basis in the interest of economy and efficiency because it is a logical follow-on to an order already issued under the contract, provided that all awardees were given a fair opportunity to be considered for the original order.

Amount: $365,956.80

[redacted]

Reviews: I have reviewed this justification and find it adequate to support other than full and open competition.

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1. **Requiring Activity:** Department Of the Army, Headquarters, U.S. Army Medical Center of Excellence, 3630 Stanley Road JBSA, Fort Sam Houston, Texas 78234.

2. **Contracting Activity:** U.S. Army Mission and Installation Contracting Command, JBSA Fort Sam Houston (MICC-FSH), 2205 Infantry Post Road, JBSA Fort SamHouston, Texas 78234-1361.

3. **Description of Action:** The Medical Center of Excellence (MEDCoE) request approval to award the MATOC Indefinite Delivery/Indefinite Quantity (ID/IQ) task order W9124J-25-F-A112 as a Sole Source logical follow on to the incumbent contractor.

4. **Description of Supplies/Services:** This MEDCoE Support Services requirement is necessary to support curriculum delivery review and evaluation, coordination, and execution of course support services for the DOTD, FMTB, training support specialist services, U.S. Army Medical Center of Excellence (MEDCoE).

5. **Authority Cited:** Title 10 U.S.C. §3406(c)(2) as implemented in FAR 16.505(b)(2)(i)*(C),* The order must be issued on a sole-source basis in the interest of economy and efficiency because it is a logical follow-on to an order already issued under the contract, provided that all awardees were given a fair opportunity to be considered for the original order.
6. **Reason for Authority Cited:**

a. Background: The MEDCoE has a requirement to provide instructional design services. DOTD/CTD Force Modernization Branch (FMTB) has the responsibilities for the development of training requirements, strategies and training products for MEDCoE new, improved and displaced systems and devices; provide input in the acquisition process assuring training capabilities and requirements are identified; documents the training strategy for institutional, operational and self-development in the System Training Plan (STRAP); provide input to the material developer in the fielding process; serves as proponent for new equipment training, and sustainment training and force modernization training; participates in the material development program reviews with the capability, training and material developers. FMTB is the capability developer and integrator for MEDCoE Training Aids, Devices, Simulators, and Simulations (TADSS).

Task orders are currently structured as 12-month awards and are subject to annual recompete. While procedurally compliant, this recurring cycle introduces significant risks to both operational continuity and cost efficiency. Each recompete increases the likelihood of performance disruptions, added onboarding delays, and higher long-term costs to the government in terms of risk, time, and resources. If the incumbent company wins the recompete, continuity is maintained, incumbent personnel remain in place, and mission support proceeds without disruption. However, there is no guarantee the incumbent will win each cycle. When a new company is awarded the contract—often through a technically acceptable proposal at a lower price—the award value is frequently below the current performance baseline. This creates immediate challenges in retaining incumbent personnel who hold critical institutional knowledge and technical expertise. Lower salaries or reduced benefits under the new award often led to staff attrition, leaving the contractor unable to field a fully qualified team at the outset of performance.

b. Alternatives: Allowing twelve-month continuation of Period of Performance as an alternative would introduce significant risks to both operational continuity and cost efficiency. Each recompete increases the likelihood of performance disruptions, added onboarding delays, and higher long-term costs to the government in terms of risk, time, and resources. As well, the recurring annual recompete discourages vendor participation. Fewer companies are willing to absorb the risks of inheriting personnel and managing rapid transitions under compressed timelines, which further limits competition and can drive instability in contract performance

c. Impact if not approved: Failure to approve this logical follow-on extension will have immediate and severe consequences for the MEDCoE mission. Disapproval would force the Government to accept one of the untenable alternatives outlined above: either initiate a high-risk recompete or allow a complete gap in service. A recompete would trigger a disruptive transition period, leading to an immediate degradation of instructor quality and the loss of critical

institutional knowledge. The resulting delay in delivering qualified instructors would directly compromise the pipeline of "trained and ready medical personnel" being supplied to worldwide contingency operations. In short, disapproval will directly result in either a severely degraded training capability or a complete cessation of mission-critical instruction, both of which are unacceptable outcomes for Army readiness and the health of the force.

7. **Actions to Increase Competition:** For this specific logical follow-on requirement, no immediate action can be taken to increase competition without incurring unacceptable mission delays and duplication of costs detailed in this justification. However, the Government is fully committed to maximizing competition for the follow-on effort. In preparation for the next competitive action at the conclusion of this extension, the Government will develop a new Performance Work Statement (PWS) that clearly defines the requirements and will allow for an adequate phase-in/transition period. This will ensure all potential offerors are positioned to compete on a level playing field for the subsequent contract award.

8. **Market Research:** Market research was conducted to determine if a source other than the incumbent could satisfy the Government's minimum requirements without causing unacceptable delays and a duplication of cost. This research consisted of a review of the capabilities of the other contractors within the Instructional Multimedia MATOC pool, combined with the Requiring Activity's intimate knowledge of the specific, highly specialized instructor qualifications needed to support the MEDCoE mission. The research confirmed that only the incumbent contractor possesses the fully trained, security-cleared, and site-acclimated personnel currently in place to guarantee uninterrupted instruction. Any other source would require a significant spin-up period to recruit, screen, and train new personnel, which would result in the mission failure outlined in this justification. Therefore, the market research concludes that only the incumbent can continue performance without a break in service.

9. **Other Facts:**

a. Procurement history. As mentioned above, this requirement is a task order under a MATOC ID/IQ which was competed among 8(a) participants in FY23. This requirement was awarded on 29 Sept 2024 to Nisga'a Tek, LLC, expiring on 28 Sept 2025. However, during the re-compete period contractor concerns regarding staffing qualified personnel surfaced. This concern as well as the issues mentioned above, prompted the decision to sole source the requirement for the FY25 period rather than re-compete.

10. **Technical Certification:** I certify that the supporting data under my cognizance, which are included in the justification, are accurate and complete to the best of my knowledge and belief.

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11. **Requirements Certification:** I certify that the supporting data under my cognizance, which are included in the justification, are accurate and complete to the best of my knowledge and belief.

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12. **Fair and Reasonable Cost Determination:** I hereby determine that the anticipated price/cost to the Government for this contract action will be fair and reasonable. This determination will be made using the Independent Government Estimate. As part of the basis, certified cost or pricing data *will not* be required per FAR 15.403-1(b)(3) because the services being acquired have been determined to be commercial in nature.

[redacted]

13. **Contracting Officer Certification:** I certify that this justification is accurate and complete to the best of my knowledge and belief.

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