Control Number: 2025-27

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: $460,314.00

[redacted]

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

[redacted]

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[redacted]

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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-A125** as a Sole Source logical follow on to the incumbent contractor.

4. **Description of Supplies/Services:** This MEDCoE Support Services requirement is necessary to perform Biomedical Equipment Technician Instructor and Support Training Services at Fort Sam Houston, Texas, in support of the U.S. Army Medical Center of Excellence (MEDCoE), Department of Clinical Specialties, Fort Sam Houston, Tx.

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 Biomedical Equipment Technician Instructor Support and Training services for Biomedical Technician Program, Department of Clinical Specialties (DCS). The Office of the Commandant (OTC), Department of Clinical Specialties (DCS) is located within the Joint-Base San Antonio (JBSA), U.S. Army Medical Center of Excellence (MEDCoE), Fort Sam Houston, TX. OTC establishes policies, procedures, and metrics to ensure quality of instruction and regularly engages with other branches and partners to pursue collaborative efforts in support of the training mission. OTC consists of the academic support and teaching departments providing initial and advanced enlisted medical skills training, leadership and clinical training for officers, and degree-granting healthcare programs from Associate through Doctorate. OTC consists of the academic support and teaching departments providing initial and advanced enlisted medical skills training, leadership and clinical training for officers, and degree-granting healthcare programs from Associate through Doctorate.

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: The Government considered all viable alternatives to this action and determined no one could meet its minimum needs without causing unacceptable mission risk and delay. Conducting another annual recompete was deemed to pose an unacceptable risk; a new awardee would likely be unable to retain the incumbent's experienced instructors, and the subsequent recruitment and MEDCoE-specific training for new personnel would create an unacceptable delay in training delivery, directly jeopardizing the DoOM's mission to produce "trained and ready medical personnel." Furthermore, performing these instructional services in-house with Government personnel is not a feasible alternative due to the current Government-wide hiring freeze, which prohibits the onboarding of the necessary staff to fill this requirement. Finally, the option to take no action and accept a gap in service is untenable, as it would result in a

complete failure to meet the MEDCoE's congressionally mandated mission and would halt the production of trained medical personnel for the force.

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 initially 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.

[redacted]

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.

[redacted]

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 nt Estimate.

[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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Approval

Based on the foregoing justification, I hereby approve the procurement of **Biomedical Equipment Technician Instructor and Training Services** on an Exception to Fair Opportunity basis pursuant to the authority of 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. The estimated value of the follow-on contract action is **$460,314.00** for a 12-month period of performance **from 29 Sept 2025 to 28 Sept 2026**. The approval is subject to the supplies and/or services herein described otherwise authorized for this acquisition.