Control Number:

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: $259,764.24

[redacted]

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

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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 Sam Houston, 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-A102** 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 services for Noncommissioned Officers Academy (NCOA) Advance Leader Course (ALC) and Senior Leader Course (SLC) at Fort Sam Houston, Texas, in support of the U.S. Army Medical Center of Excellence (MEDCoE), Noncommissioned Officers Academy (NCOA) Virtual Instructor Services, 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.

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6. Reason for Authority Cited:.

a. Background: The Medical Noncommissioned Officers Academy has a requirement for an increase in Professional Military Education (PME) training, services, and products to support military leadership and emerging force structure training requirements throughout the US Army. NCOA is responsible for training and educating Sergeants, Staff Sergeants, and Sergeant First Class with the technical, tactical, and leadership/trainer skills necessary to be successful in Army operations as squad/platoon sergeants and First Sergeants in career management field (CMF) 68. To accomplish this mission, must provide trained and ready personnel and provide the leadership foundation upon which the Army bases its future NCOs and is essential to growing a highly trained and effective fighting force.

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 full-year extensions will result in heightened mission risk, repeated performance disruptions, and increased costs associated with onboarding and oversight. Each annual recompete introduces uncertainty that directly affects workforce stability, vendor participation, and the government's ability to maintain uninterrupted operations. By extending contracts,

the government safeguards continuity, ensures cost-effective performance, and avoids the cumulative impacts of recurring transition risk.

7. **Actions to Increase Competition:** None. The current contracts comprising the MATOC were competed as an 8(a) set-aside and awards were made to multiple offerors under the Instructor Multimedia MATOCs.

8. **Market Research:** This requirement is being solicited on a sole source basis as a logical follow-on under the Instructional Multimedia (IM) Multiple Award Task Order Contract (NATOC) awarded March 2023. This is a follow on.

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 **19 Sept 2024 to Aktarius, LLC**, Dawson AKT expiring **on 28 Aug 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 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.

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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 **Virtual Instructor 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 **$259,764.24** for a 12-month period of performance **from 29 Aug 2025 to 28 Aug 2026**. The approval is subject to the supplies and/or services herein described otherwise authorized for this acquisition.