Federal Supply Schedule FAR 8.4

Sole Source Justification

SECTION I: Introduction

In this document, citations to Revolutionary FAR Overhaul Part 8 are citations specifically to Federal Acquisition Regulation (FAR) Class Deviation 25-20 for FAR Part 8, which was issued as part of the Revolutionary FAR Overhaul (RFO), which was implemented in response to Executive Order 14275, *Restoring Common Sense to Federal Procurement*, signed April 15, 2025.

The Transportation Security Administration (TSA), Office of Trusted Traveler Credentialing (TTC) and Contracting and Procurement (C&P) propose to issue a delivery order that restricts the number of sources considered (FAR 8.4

The procurement request number is PR267503A038 and Contracting and Procurement's J&A tracking number is JA-2026-04-1353.

Per FAR 8.4, this acquisition is conducted under the authority of the GSA Federal Supply Schedule Program.

SECTION II: Description of Action Being Approved

(a) RELI Group, Inc.
(b) Type of action: Firm Fixed Price Modification
(c) [redacted]
(d) Year of funding: FY2026
(d) Period of Performance: Three months if all options are exercised
(f) The incumbent contractor is the only responsible source capable of providing uninterrupted support for Enrollment Services and Vetting Programs (ESVP) and Vetting Analysis Division (VAD)/Security Threat Assessment Division (STAD) during the transition to the new contract. RELI Group, Inc. currently provides the full spectrum of program management, analytic, training, forensic, reporting, and Quality Control (QC)/Quality Assurance (QA) services under contract 70T02025F7503N002 and has built detailed ,working knowledge of TSA's vetting and credentialing mission, systems, workflows, and stakeholder environment. The contractor's staff are already cleared, fully onboarded, and embedded across ESVP and VAD/STAD operations, including seven-day forensic support, complex encounter management workflows, and integrated reporting and analytics that directly support operational decision-making. Replacing this support, even temporarily, would require a new contractor to recruit and clear staff, learn TSA's mission, tools, and procedures, and rebuild the existing reporting, analytic, and program management cadence – all for a very short bridge period, which is neither practicable nor cost-effective.

A lapse in support, or a hurried change of contractor for only a brief interim, would pose significant risk to TSA operations. It would disrupt mission-critical vetting, encounter management, and reporting activities; cause loss of continuity in ongoing initiatives and performance monitoring; and drive additional cost for transition, onboarding, and re-establishing processes. It would also divert Government away from completing the competitive follow-on actions. Extending the incumbent's bridge contract for a short, defined period is therefore the only practical means to ensure continuous, stable support for ESVP and VAD/STAD while TSA completes and awards the new competitive IPMSS task orders.

SECTION III: Description of Supplies or Services

Under this modification, the contractor will continue to provide non-personal professional services that include, but are not limited to:

- General Program/Project Management Support – maintaining and updating project plans, schedules, risk and issue logs, status reporting, and governance forums needed to manage cost, schedule, and performance across TTC/ESVP, VAD, and STAD portfolios.
- Strategic Planning and Business Process Analysis/Re-Engineering Support – supporting strategic planning, conducting "as-is" and "to-be" process analysis, identifying efficiencies, and developing implementation plans for improvements to vetting, adjudication, and enrollment operations.
- Policy Development Support – assisting with the drafting, review, and maintenance of policies, SOPs, and related documentation (including privacy and governance artifacts) necessary for compliant execution of vetting and credentialing programs.

- Knowledge Management Support – maintaining SharePoint/iShare sites, knowledge repositories, and job aids to ensure consistent, documented procedures and ready access to current guidance and reference materials for government and contractor staff.
- Training Support – developing, updating, and delivering new-hire, refresher, and system-specific training for vetting, encounter management, and analytic functions, including training logistics and maintenance of training libraries.
- Reporting and Analytics Support – producing and maintaining operational and management reports, dashboards, Key Performance Indicators (KPIs), and ad hoc analyses that support decision-making for vetting, call center, forensic, and adjudication operations, and that meet oversight and audit requirements.
- Quality Control and Quality Assurance (QC/QA)– collecting and analyzing quality metrics, supporting QC/QA reviews, and providing dashboards and trend analysis to ensure vetting and adjudication processes meet established performance and accuracy standards.
- Technical and Scientific Support – providing subject matter expertise in data analysis, modeling, and other technical areas necessary to support mission needs, including support for optimization, requirements, and system-related initiatives as directed by the government.

These services are essential to maintaining continuous, compliant operation of TSA's vetting and credentialing programs and to ensuring that existing initiatives, performance monitoring, and governance processes remain stable during the transition to the new VAD/STAD and ESVP task orders.

SECTION IV: Identification of the Sole Source Consideration Rationale

GSAR 538.7104-3 (b) Exceptions:

☐ (i) The need is of such unusual urgency that following the procedures would result in unacceptable delays in fulfilling that need,

☒ (ii) Only one source is capable of providing the products, services, or solution required at the level of quality required because the products, services, or solutions are unique or highly specialized. * Note: if using "brand name", clearly explain why brand name or equal is not a viable solution.

☐ (iii) The order should be issued on a sole source basis in the interest of economy and efficiency because it is a logical follow-on to an FSS order already issued on a competitive basis. .

- Original Order Number: _____

☐ (iv) It is necessary to place the order with a particular Federal Supply Service (FSS) contractor to satisfy a minimum guarantee established in the FSS BPA

☐ (v) A law expressly authorizes or requires that the purchase be made from a specified source.

SECTION V: Description of Sole Source Rationale

The incumbent contractor is the only responsible source capable of providing uninterrupted support for ESVP and VAD/STAD during the transition to the new contract. RELI Group, Inc. currently provides the full spectrum of program management, analytic, training, forensic, reporting, and QC/QA services under contract 70T02025F7503N002 and has built detailed, working knowledge of TSA's vetting and credentialing mission, systems, workflows, and stakeholder environment. The contractor's staff are already cleared, fully onboarded, and embedded across ESVP and VAD/STAD operations, including seven-day forensic support, complex encounter management workflows, and integrated reporting and analytics that directly support operational decision-making. Replacing this support, even temporarily, would require a new contractor to recruit and clear staff, learn TSA's mission, tools, and procedures, and rebuild the existing reporting, analytic, and program management cadence – all for a very short bridge period, which is neither practicable nor cost-effective.

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SECTION VI: Contracting Officer's Determination that the Order Represents the Best Value

The extension will be priced at the existing contract rates (as applicable within the BPA/GSA MAS structure), which were previously determined to be fair and reasonable through competition and price analysis at award.

The cost for the three-month extension is based on:

- The current bridge order's labor mix and FTE levels.
- The IPMSS BPA labor categories and discounted ceiling rates; and
- The same level of effort is necessary to sustain operations for an additional two months.

Because no significant changes to the level of effort, labor categories, or scope are anticipated for the extension, and because the duration is strictly limited, the Contracting Officer will determine that the anticipated cost to the Government is fair and reasonable.

SECTION VII: Market Research Description

Market Research for the follow-on requirements referenced above is that the requirement is a commercial services effort under NAICS 541611 (Administrative Management and General Management Consulting) and PSC R408 (Program Management/Support Services). Second, Market Research further confirms that TSA's enterprise IPMSS BPAs with Hive Group and RELI Group (under GSA MAS 541611) are appropriate vehicles and are designated DHS/TSA strategic sourcing solutions for program and project management support. Finally, Market Research identifies multiple capable small and large business sources under GSA MAS and the TSA IPMSS BPAs, and notes that labor rates and pricing structures are transparent and can be benchmarked against GSA MAS and BPA rate schedules.

Collectively, this market research supports treating the follow-on requirements as competitive commercial services orders under the IPMSS BPAs and confirms that this J&A is limited to a short-term, extension solely to maintain continuity of support until those competitive orders are awarded.

SECTION VIII: Other Facts Supporting the Sole Sources Justification

None.

SECTION IX: Actions Taken to Remove Barriers to Competition

No barriers to competition have been identified for the long-term requirement. TSA will compete the follow-on IPMSS orders under its IPMSS BPAs (Hive Group and RELI Group) as commercial services acquisitions under FAR Part 12 and the applicable BPA ordering procedures. The approved PRs (PR267503A018 and PR267554A027), together with the ESVP and VAD IPMSS PWSs and the associated Market Research Reports, will form the basis for those competitions.

Given the very short duration of this bridge extension, soliciting offers from additional sources for interim support would not be practicable or cost-effective and would introduce transition risks disproportionate to any potential benefit.

SECTION X: Contracting Officer Certification

I certify that this justification is accurate and complete to the best of my knowledge and belief.

[redacted]	[redacted]	
Name (Printed)	Signature	Date

SECTION XI: Technical or Requirements Personnel Certification

I certify that this requirement meets the Government's minimum need and that the supporting data, which forms a basis for this justification, is complete and accurate.

[redacted]	[redacted]	
Name (Printed)	Signature	Date

SECTION XII: Concurrence and Approval

The required levels of concurrence and approval of this Sole Source Justification depend on the estimated total value of the procurement. Concurrence and approval must be obtained for that level and each previous level.

Estimated Procurement Value: [redacted]

Concurrence:

Program Manager: [redacted]

Name (Printed)	Signature	Date
[redacted]		

Contracting Officer: [redacted]

Name (Printed)	Signature	Date
[redacted]		

Division Director: [redacted]

Name (Printed)	Signature	Date
[redacted]		

Estimated Procurement Value: [redacted]

TSA Competition Advocate: [redacted]

Name (Printed)	Signature	Date
[redacted]		