U.S. Immigration and Customs Enforcement

J&A-26-0082

Pursuant to the requirements of the Competition in Contracting Act (CICA) as implemented by the Federal Acquisition Regulation (FAR) 6.103 (FAR Class Deviation 25-11.[1]) and in accordance with the requirements of RFO 6.104, the justification for the use of the statutory authority under RFO 6.103 is justified by the following facts and rationale required under RFO 6.104-1 as follows:

1. **Agency and Contracting Activity.**

The Department of Homeland Security, U.S. Immigration and Customs Enforcement, Office of Acquisition Management, proposes to enter into a contract on behalf of The Office of Training and Development (OTD), on a basis of other than full and open competition.

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

(a) Nature of action: OAQ intends to procure, on a sole source basis, **LinkedIn Learning Licenses** for access to a commercial training content library. The contract shall consist of a base year plus four (4) options for a total of five (5) years. The vendor listed below, Carahsoft, is the only Authorized company that can provide the basic LinkedIn Learning licenses required to the Government.

(b) Name and address of the Contractor:

Carahsoft Technology Corp.
11493 Sunset Hills Road
Reston, VA 20190

(c) Contract Type: Firm-Fixed Price (FFP) Purchase Order (PO).

(d) Estimated Total Value (including options):

Period	Quantity	Price	Total
Base Year	12 mo. 5000	[redacted]	[redacted]
Option Year 1	12 mo. 5000		
Option Year 2	12 mo. 5000		
Option Year 3	12 mo. 5000		
Option Year 4	12 mo. 5000		

[1] FAR Class Deviation 25-11 is implemented as a result of Revolutionary FAR Overhaul, referred 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 as RFO.

Total [redacted]

Note: If the products or services under the justification were previously awarded under another contract, also provide the period of performance end date for that contract(s).

(e) Type of funding: Operations and Support.

(f) Year of funding: Fiscal Year 2026.

(g) Solicitation Number: 192125LDC2022028

(h) Background information about the requirement: This requirement was for the same LinkedIn Learning Licenses for the POP of August 26, 2025, through April 25, 2026.

3. Description of Supplies/Services.

This requirement is to procure LinkedIn Learning Licenses for access to the LinkedIn Learning commercial content library of over 18,000 high quality instructionally sound courses.

4. Identification of statutory authority permitting other than full and open competition.

The statutory authority permitting other than full and open competition is 41 U.S.C. §3304 as implemented by:

☒ RFO 6.103-1: Only one responsible source and no other supplies or services will satisfy agency requirements.

☐ RFO 6.103-2: Unusual and compelling urgency.

☐ RFO 6.103-3: Industrial mobilization; engineering, development, or research capability; or expert services.

☐ RFO 6.103-4: International agreement.

☐ RFO 6.103-5: Authorized or required by statute.

☐ RFO 6.103-6: National security.

☐ RFO 6.103-7: Public interest.

5. Identification of Exception to the Buy American Statute

N/A

6. Demonstration that the proposed contractor's unique qualifications or the nature of the acquisition requires use of the authority cited.

This requirement is justified to improve workforce efficiency, reduce costs, and ensure compliance with 2025 Executive Orders while providing skills-based training and professional development as mandated under 5 CFR 410.201, subpart B.

Pursuant to Executive Order (EO) 1420 Eliminating waste and saving taxpayer dollars by consolidating procurement, March 20, 2025. OTD stopped current task orders on our contracts for experiential learning including Gettysburg, Mt. Vernon, and Museum of Tolerance (MOT) for an approximate total savings of [redacted]. April 22, 2025, DHS requested cancellation of the contract vehicles. Experiential learning is used to fulfill mandated career development opportunities (5 CFR 410.201, subpart B) as well as continuing supervisory training as mandated by 5 CFR 412.202, and Federal Workforce Flexibility Act of 2004 (P.L. 108-411). A replacement for experiential learning is required to maintain compliance with federal statutes.

Percipio was a learning platform produced by SkillSoft that provides a library of self-paced online courses on a variety of topics and was previously provided by DHS for the components. OTD used this content access as the content for training paths offered by ICE operational programs and for OTD programs such as Team Member Leadership Development (TMLD). DHS provided umbrella licenses to the participants until last year. DHS could not fully fund Percipio. To reactivate OTD was informed that the cost for next year of access would be [redacted] per year for ICE participation. A more cost-effective replacement for this content is required, or critical programs will be negatively impacted.

By providing LiL access, ICE can increase operational efficiency, lower training costs, align with 2025 Executive Orders, and maintain compliance with federal law regarding supervisory training and career development while continuing to ensure a highly skilled and adaptable workforce.
Accordingly, this requirement directly supports workforce development, operational effectiveness, and long-term talent management objectives for ICE.

LinkedIn Learning is the only vendor that provides 24/7 access to over 19,000 courses, and more than 250 professional certificate programs in highly requested subjects including agile project management, statistics, cybersecurity, change management, business communication, negotiation, finance, and many more in partnership with industry leaders. No other commercial content library offers professional certifications making this vendor unique. This feature also provides a substantial cost savings as comparable professional certificate programs cost thousands of dollars for each user. These certifications are at no additional cost.

LinkedIn Learning delivers over 5,000 continuing education units (CEUs) from respected industry leading groups such as the project management institute (PMI), HR certification Institute (HRCI), International Institute of Business analysis (IIBA), the Society for Human Resource Management (SHRM), and Computing Technology Industry Association (CompTIA). A CEU costs from [redacted] for each CEU if earned directly from colleges, industry groups, or certification providers. This is an additional cost savings to the government. No other commercial content library offers recognized CEUs making this vendor uniquely qualified to meet our requirements.

LinkedIn Learning Includes access to thousands of professional exams and exam preparation programs including PMI's, ISC2, Microsoft, Oracle, Leed, and CompTIA exams. Comparable exam preparation costs [redacted] per user. No other commercial content library offers exam preparation courses and full practice examinations making this vendor unique and providing another cost savings to the government.

LinkedIn Learning also allows for unlimited individualized professional development that is high choice and created by educational experts. Other commercial content libraries do not fully vette or produce all of the content provided. This results in variable quality and low confidence in the accuracy of the competing products. Only this vendor provides content exclusively developed by instructional designers and professionally produced. Further, their partnership with the leading industry experts and companies allows them to provide training and education that is fully vetted and accepted in the public and private sectors. This is another unique feature of this specific product.

- **If using "Only One Responsible Source and No Other Supplies or Services Will Satisfy Agency Requirements"**

The Government requires access to LinkedIn Learning licenses to increase operational efficiency, lower training costs and meet critical program objectives, which align with EO 14240, and Executive Order 14275, *Restoring Common Sense to Federal Procurement,* signed April 15, 2025 maintain compliance with federal law regarding supervisory training and career development while continuing to ensure a highly skilled and adaptable workforce.

No other vendor has the depth and breadth of the training content available in LinkedIn Learning. No other vendor has the quality of training content created in partnership with the leading authorities on subjects including IT modernization, cybersecurity, and data analytics that this product has, nor do they have the accreditations and recognition to offer continuing education units leveraging this course content to help reduce the cost to maintain various professional credentials.

If this requirement is not acquired, the Government risks non-compliance with federal law. The Government would also risk workforce skill gaps, misaligned training investments, and reduced readiness in critical mission areas such as IT modernization, cybersecurity, and data analytics. Additionally, transitioning to multiple vendors to replicate partial capabilities would increase administrative burden, create inefficiencies, and potentially result in higher

overall lifecycle costs. Continued access to LinkedIn Learning ensures standardized, scalable, and market-aligned professional development across the workforce.

7. Description of efforts made to ensure that offers are solicited from as many potential sources as is practicable.

A Request for Information (RFI) was issued to GSA on January 8, 2026. In response, Seven (7) vendors applied. Four (4) small and three (3) large. Vendor Names: Skill-soft, Kambrian Corporation, New Tech Solutions, INC, Carahsoft Technology Corp, Cornerstone On demand Essnova solutions, INC., Core value tec, INC.

OAQ intends to make this justification publicly available pursuant to RFO 6.301(b) on sam.gov within 14 days after award.

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

The contracting officer has determined that the anticipated total price of [redacted] for a 5-year period is fair and reasonable. This determination is based on the review of the vendor's quote, compression with previous LinkedIn license purchases, and the Independent Government Cost Estimate (IGCE). Market research and historical pricing data further support the reasonableness of the proposed price. The contractor previously provided the same services at a cost of [redacted] for a 3-year period. The current five-year price reflects a reasonable escalation over time, demonstrates pricing stability and is consistent with industry practices, in accordance with RFO 15.407(b).

9. Description of Market Research.

Market research was conducted through GSA's Market Research as a Service (MRAS) for LinkedIn Learning licenses indicates that Carahsoft Technology Corp. is the only company capable of performing the specific government requirement for these services. Following the standard MRAS process, which includes a comprehensive RFI to identify available industry solutions and contract information, in response to the RFI Seven (7) vendors provided their capabilities. Four (4) small and three (3) large businesses. [redacted]
After the evaluations of the capabilities, it was determined that only the LinkedIn platform provided by the Carahsoft technologies meet the Government's need. Carahsoft serves as the primary provider for LinkedIn Learning's full suite of products to the public sector. This determination aligns with previous government findings, such as those by the Consumer Financial Protection Bureau, which identified Carahsoft as the sole source capable of providing these licenses at the required level of quality and uninterrupted access.

10. Any other facts supporting the use of other than full and open competition.

N/A

11. A statement of the actions, if any, the agency may take to remove or overcome any barriers to competition before any subsequent acquisition for supplies or services required.

For the current requirement, full market research was conducted by OTD. OTD will continue to conduct market research efforts to determine if any other vendors have developed comparable databases that would allow for competition in any subsequent acquisition in the future.

13. Contracting Officer's Certification.

I certify that the data supporting the recommended use of other than full and open competition is accurate and complete to the best of my knowledge and belief.

_____ _____
Contracting Officer Date

The Contracting Officer is the final approving official when the action is less than or equal to $900K and must also sign the justification when the contract is awarded under RFO 6.103-7, Public Interest, regardless of dollar amount.

14. Technical/Requirements Personnel Certification.

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

_____ _____
Technical Representative/COR Date