JUSTIFICATION FOR AN EXCEPTION TO FAIR OPPORTUNITY

UNDER INDEFINITE DELIVERY/INDEFINITE QUANTITY (IDIQ) CONTRACTS

Solicitation 47QFMA22R0004 ***(Award PIID: 47QFMA22F0011)***

My DOD Identity Solutions (MYDIS)

in support of:

Defense Manpower Data Center (DMDC)

United States (U.S.) General Services Administration (GSA)
Federal Acquisition Service
Assisted Acquisition Services (AAS) Army

Interagency Agreement Number 47QFMA10S0001

Controlled by AAS Contracting Officer ***(David Roberts)*****:** ***(david.a.roberts@gsa.gov)***

The General Services Administration (GSA) Assisted Acquisition Services (AAS) makes this Justification for the issuance of an Exception to Fair Opportunity order pursuant to Federal Acquisition Regulation (FAR) 16.5 (GSA Class Deviation Revolutionary FAR Overhaul (RFO)-2025-16).

1. **Identification of Agency and Contracting Activity:**

   Agency:

   GSA AAS acting in support of Defense Manpower Data Center

   Contracting Activity:

   GSA AAS Contracting Office (QFAC)
   1800 F Street, NW
   Washington, D.C. 20405

2. **Nature and/or Description of Action Being Approved:**

   The action being approved is a modification to increase the overall ceiling amount of My DoD Identity Solution (MyDIS) Task Order (TO) 47QFMA22F0011, issued against the Alliant 2 GWAC, from [redacted]. This ceiling increase is the result of increases to the level of effort for Time & Materials (T&M) CLIN 0001 - Labor (Tasks 0-6) in Option Periods three through five. As explained in further detail below, this increase is necessary for the contractor to achieve timely Initial Operating Capacity (IOC) of its identity and credentialing solution as well as to respond to changes in client requirements.

3. **Description of Supplies/Services and Estimated Value:**

   MyDIS TO 47QFMA22F0011 was awarded to Guidehouse Digital, LLC (Guidehouse) on 27 September 2022 for a twelve-month base period and five one-year option periods. MyDIS[1] is an innovative enterprise solution that supports identity, affiliation, and credential management. It will replace critical and major business processes that are currently supported by the legacy Real-time Automated Personnel Identification System (RAPIDS). DMDC mandates IOC of MyDIS by February 2027.

   In January 2026, the Defense Human Resources Activity (DHRA) transitioned its enterprise service management platform from ServiceNow to Salesforce as a part of an ongoing modernization effort and digital transformation across the United States (U.S.) Army and other Department of Defense (DoD) components. This strategic shift requires Guidehouse to undertake the critical integration of MyDIS with the new Salesforce environment. Integration is essential to developing and implementing a comprehensive

[1] Originally known as ICEs2.

[redacted]

inventory management system and an appointment scheduler within Salesforce. These functionalities are vital to the successful deployment and operation of MyDIS by the mandated IOC date.

As a result of this modification, the overall potential Task Order ceiling is anticipated to increase from [redacted] over Option Periods three through five.

4. **Identification of the Exception to Fair Opportunity and Rationale:**

This TO justification is being prepared as required by FAR 16.601-5(c)(3) (GSA Class Deviation RFO-2025-16) and FAR 16.507-6(b)(2) (GSA Class Deviation RFO-2025-16) - only one awardee is capable of providing the supplies or services required at the level of quality required because the supplies or services ordered are unique or highly specialized.

MyDIS is a partially-developed solution and pivoting its integration into the new Salesforce platform will require additional effort to ensure conformity to Salesforce features. For example, ServiceNow is primarily structured around Information Technology (IT)-centric tasks while Salesforce is more focused on Customer Relationship Management (CRM) objects. This means that ServiceNow focuses on the lifecycle and governance of an identity as it moves through internal systems. It treats an identity like an IT asset that must be provisioned, tracked, and secured according to strict compliance standards. By contrast, Salesforce will focus on a “360 view” of the identity through the aggregation of the identities' data collected via multiple DoD systems resulting in a "Single Source of Truth." ServiceNow features customizations like approval processes which do not directly map to Salesforce automation. Additionally, replicating role-based access, profiles, and permissions between these platforms can pose challenges. For example, both platforms use Role Based Access Control, but they define “roles” and “permissions” using different architectural layers. Finally, the migration of large amounts of data from ServiceNow to Salesforce requires additional effort to safeguard against data loss. While this transition would be much more complex if MyDIS was at Full Operational Capability (FOC), it still poses many challenges at this point in the development process and additional effort is necessary to navigate them.

The Government approximates a need for additional contractor Full-Time Employees (FTEs) who possess highly specialized skills in order to provide Project Management and Planning, System Design, Implementation and Integration, Sustainment and Maintenance of the System, and Enhancements services to the Developed Capability (Tasks 00, 02, 03, 04, and 06). These services will support the aforementioned development and implementation of a worldwide inventory management system, a worldwide Identification Card Office On-Line (IDCO), a site maintenance tool (SMT) within Salesforce, and then the eventual integration of those systems with MyDIS. This increased effort is critical in order to complete these tasks while simultaneously

progressing the MyDIS platform to Initial Operating Capability (IOC) no later than February 2027. The expanded effort will include augmenting existing roles such as Systems Architects, Requirements Managers, various IT Discipline Engineers, and Cyber Security Specialists.

Guidehouse is uniquely capable of providing the highly specialized services required, at the level of quality required, and within the timeframe required. Only Guidehouse offers the functional and technical expertise to effectively perform this work within the timeframe required. Over the last two years, Guidehouse and their partner Intercede have been developing the MyDIS Identity, Credential, and Access Management (ICAM) solution incorporating Intercede's proprietary MyID credential management product. MyID is a credential management system (CMS) that enables organizations to issue, manage, and revoke secure digital identities for employees. As discussed, MyDIS will provide DoD with an enterprise solution to support identity, affiliation, and credential management and will replace all critical and major business processes currently supported by the legacy Real-time Automated Personnel Identification (RAPIDS). As the incumbent contractor for this task order for two years, Guidehouse possesses a thorough understanding of the MyDIS environment and is the only contractor that can provide the critical knowledge, skills, and experience to support this action within the required timeframe.

Competing this additional effort would severely jeopardize the attainment of IOC by February 2027. Another contractor would need to spend significant time becoming familiar with Guidehouse's MyDIS solution in order to complete integration of MyDIS with Salesforce.

Failure to achieve IOC by February 2027 would result in a significant loss of value from the current task order and would also delay the entire development project timeline for MyDIS. As a result, DMDC would be forced to incur the additional cost of maintaining the legacy system RAPIDS.

Therefore, based on the information provided, Guidehouse Digital, LLC is currently the only source capable of satisfying this requirement.

5. **Determination That the Anticipated Cost is Fair and Reasonable:**

For the proposed additional tasks, the contractor is expected to utilize the existing task order labor rates, or similar rates, which were previously analyzed and found fair and reasonable as part of the original determination. This determination was based on comparisons of the proposed prices (both the proposed labor rates and the total proposed price) against the Independent Government Cost Estimate (IGCE) and relevant market research data for similar items, consistent with FAR 15.404-1(b)(5) (GSA Class Deviation RFO-2025-15) and 15.404-1(b)(4)(GSA Class Deviation RFO-2025-15). The

Contracting Officer will make a new fair and reasonable price determination in accordance with the techniques identified in FAR 15.404 (GSA Class Deviation RFO-2025-15) for the revised total price before awarding the modification. This subsequent determination for the new tasks is anticipated to rely primarily on a comparison with the client developed IGCE specifically for the revised requirements.

Other Facts Supporting the Justification:

No other facts are available at this time.

7. **Statement of Actions:**

The Government will increase the ceiling of the MyDIS task order 47QFMA22F0011 to enable the fulfillment of the increased level of effort under PWS Tasks 0-6 for Option Periods three (3) to five (5). No other contractorcan provide the necessary services at the requisite level of expertise within the timeframe required. Ongoing market research will be conducted and will be utilized to promote competition if the MyDIS requirements are to be re-solicited at the end of this task order's full period of performance in 2028.

8. **Certification by Technical or Requirements Personnel:**

I hereby certify that the supporting data is accurate and complete.

[redacted] 4/1/2026 | 14:39:01 BST

[redacted] Date

Project Manager, [redacted]

9. **Signature of Authorized Officials:**

I hereby certify that the Justification is accurate and complete to the best of my knowledge and belief, and I determine on the basis of the findings above that the exception to fair opportunity is in accordance with the requirements and is in the best interest of the Government.

DocuSigned by:
David Roberts
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David A. Roberts Date

Contracting Officer, AAS Army
Assisted Acquisition Services

I hereby certify that the Justification is accurate and complete to the best of my knowledge and belief, and I determine on the basis of the findings above that the exception to fair opportunity is in accordance with the requirements and is in the best interest of the Government.

4/1/2026 | 14:46:07 BST

Date

Client Executive,