SOLE SOURCE JUSTIFICATION FOR AN ORDER/BPA EXCEEDING THE SIMPLIFIED ACQUISITION THRESHOLD (AUTHORITY: FAR Subpart 8.4 and GSAR 538.7104-3(b)(ii))

Purchase Request Number: EDOFSA-26-000551

This acquisition is conducted under the authority of the Federal Supply Schedule (FSS) Program. Pursuant to the Revolutionary Federal Acquisition Regulation (FAR) Overhaul (RFO) and Acquisition Alert (AA) 2025-23, procedures for ordering under the Federal Supply Schedules (FSS) are moved from the FAR to the General Service Administration Acquisition Regulation (GSAR) 538.71. This justification is executed in accordance with GSAR 538.7104-3(b)(ii).

1. **Agency and contracting activity.**

   Department of Education, Federal Student Aid (FSA), Contract Operations Division.

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

   Under the General Services Administration (GSA) Multiple Award Schedule (MAS), Contract Number 47QTCA20D000E, FSA is awarding Phoenix Programming Services (PPS) InfoTech, Limited Liability Company (LLC) a firm-fixed-price task order to procure support services for the Person Authentication Service (PAS) system.

3. **Description of the supplies or services required to meet the agency's needs (including the estimated value).**

   The PAS system provides an enterprise-wide solution for user identity and access management for external and internal facing applications to ensure appropriate and secure access to student aid records and protect the identity of system applicants. PAS coordinates with the Department and FSA leadership to set enterprise-wide Information Technology (IT) security policies, standards, and guidelines for managing access to FSA applications, systems, and services. PAS provides an approach promoting mutual trust and interoperability between the PAS solution and integrated FSA applications, systems, services, and customers.

   Objectives:
   1. Strengthen FSA applications and systems security.
   2. Enable information sharing and safeguarding within FSA applications and systems.
   3. Securely deliver mission critical services to FSA applications, systems, and customers.
   4. Support seamlessness and efficiency in the FSA IT ecosystem.

   Services Provided:
   1. Authentication: Verification that an entity is who/what it claims to be.
   2. Authorization: Managing authorization information an entity can access.
   3. Interchange: Exchange of identity information between FSA applications, systems, and Customers. (Technologies: Open Authorization (OAuth) Open Identity Connect (OIDC), Security Assertion Markup Language (SAML), Application Programming Interface (API),

Security Tokens (JavaScript Object Notation (JSON) Web Tokens and SAML Assertions), Secure Lightweight Directory Access Protocol (LDAP)

The PAS system provides mission critical authentication and logon credentials for the services and support to 100+ million students, parents, and borrowers to access public-facing FSA applications.

The PAS system supports Non-Privileged External Users (Non-ED.gov) to include Student Applicants, Parents, and Borrowers applying or will apply for Financial Aid accessing their own Title IV information.

FSA must continue services for operational and maintenance support for ongoing activities for the PAS system to provide a full range of technical and project management services for integrated FSA applications with the PAS system.

The PAS system is unified with the Access and Identity Management System (AIMS), which provides user and system validation for all system-to-system interconnections/communications, ensuring the validity of the user accessing the system. The PAS support applications are also behind the AIMS Single-Sign on (SSO) Portal that authenticates users' access. The underlying technology and infrastructure used to run the AIMS and PAS systems are the same International Business Machines (IBM) Security and Linux operating technologies, allowing the technical support team to support either system quickly. AIMS and PAS interconnections/communications are reliant upon each other for successful operations and services.

Uninterrupted services are critical in supporting FSA's priority for the Federal Student Aid supported Free Application for Federal Student Aid (FAFSA) 2027/2028.

The estimated value of this new task order is $4.98 million.

The estimated period of performance is as follows:

Base Period: July 1, 2026 – September 30, 2026
Option Period One: October 1, 2026 – October 31, 2026
Option Period Two: November 1, 2026 – November 30, 2026
Option Period Three December 1, 2026 – December 31, 2026

The Government will also include FAR 52.217-8, Option to Extend Services, for up to an additional six (6) months, if required to ensure continuity of services.

4. **Authority and supporting rationale.** The following circumstance justifies limiting the source as supported below:

<u>Only one source under the authority of GSAR 538.7104-3(b)(ii)</u>

Currently, only one source, PPS InfoTech, LLC, can continue the current services and support without causing disruption to FSA's PAS System. A lapse in services and support would cause an immediate disruption to all mandatory business operations across FSA systems.

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Following award of the One IAM task order on April 16, 2026, a protest was filed on April 27, 2026, resulting in uncertainty regarding the transition execution timeline and creating immediate continuity risk for mission-critical PAS operations scheduled to transition during the same operational period.

PPS InfoTech is the only Contractor currently operating within the PAS production environment with immediate operational access, in-depth critical institutional knowledge and skills, established integrated support processes, and active responsibility for sustaining the interconnected PAS and AIMS authentication ecosystem supporting enterprise-wide identity validation and access management services. Transitioning these services to another Contractor during an active protest period would introduce substantial operational, cybersecurity, continuity, and production stability risk to mission-critical FSA authentication services supporting more than 100 million external users.

Further, PPS InfoTech has in-depth critical institutional knowledge and skills, specifically within FSA supporting the PAS system, which provides an enterprise-wide solution for user identity and access management for 100+ million external users accessing public facing FSA applications. This ensures appropriate and secure access.

Executing this bridge task order with the current Contractor avoids disruption to current efforts, allows necessary transition-out support activities, and maximizes the success rate of key FSA initiatives to be released into production.

The bridge period of performance is specifically structured to preserve uninterrupted authentication and identity management operations while supporting phased transition-out and operational knowledge transfer activities associated with the delayed One IAM consolidated task order effort. Because PAS and AIMS operate as interconnected production identity services supporting continuously active authentication, authorization, federation, and credential validation processes, transition activities must occur concurrently with ongoing operational support to avoid service degradation, authentication failures, cybersecurity vulnerabilities, or disruption to public-facing FSA systems. The bridge duration reflects the necessary period of performance to sustain secure operations pending resolution of the protest and completion of orderly transition sequencing activities.

5. Determination by the ordering activity contracting officer that the order represents the best value consistent with FAR Subpart 8.4 and GSAR 538.7104-3(b)(ii).

Since (a) GSA has already determined the prices of the supplies and services under FSS contracts, including rates for services offered at fixed hourly rates to be fair and reasonable; and (b) by placing an order against a schedule contract in accordance with FAR Subpart 8.4 and GSAR 538.7104-3(b)(ii), the ordering activity Contracting Officer (CO) has concluded that the order represents the best value (see FAR 2.101) and results in the lowest overall cost alternative as follows:

The Government determined that continuation with the incumbent Contractor represents the lowest operational risk and lowest total continuity cost alternative available during the protest

period. It avoids duplicative transition activities, eliminates unnecessary operational turnover risk, preserves ongoing production support continuity, and minimizes the likelihood of critical service disruption impacting FSA systems and public users.

The CO has determined that the expected outcome of this acquisition provides the greatest overall benefit in response to the requirement and therefore the best value to the Government consistent with FAR Subpart 8.4 and GSAR 538.7104-3(b)(ii), based on all factors considered within this justification.

Further, the CO will determine that the prices are reasonable for this effort to ensure that discounts are solicited, while a reasonable level of effort and labor mix are evaluated under these procedures.

Lastly, this approach provides the greatest overall benefit in response to the requirement and results in the lowest overall cost alternative, namely in the form of time, cost, risk, and opportunity.

6. Market research was conducted among schedule holders (or reason market research was not conducted).

Market research began immediately after the protest was received on April 27, 2026. It was conducted by engaging in discussions with technical and subject matter experts to confirm the incumbent Contractor is the only source capable of providing continued services, and subsequently required transition-out activities, ultimately ensuring mission-critical quality levels are achieved/maintained and a smooth transition is accomplished. The Government considered whether another qualified FSS Contractor could reasonably assume operations within the required timeframe. However, due to the integrated and continuous operational nature of PAS and AIMS services, combined with the active protest posture and immediate continuity requirements, no alternative Contractor could feasibly transition into performance without unacceptable operational and mission risk.

7. Any other facts supporting the justification.

N/A

8. Actions, if any, the agency may take to remove or overcome any barriers that led to the restricted consideration before any subsequent acquisition for supplies and services is made.

N/A

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9. Technical/Requirements Representative Certification.

I certify that this requirement constitutes the Government's minimum needs and the supporting data provided herein is accurate and complete to the best of my knowledge and belief.

VON KRATT Digitally signed by VON KRATT
Date: 2026.06.10 08:33:06 -04'00'

Von Kratt
Identity and Access Management (IAM) Division
Branch Chief

Date

10. Approving Official Determination of Circumstance Applicability.

In accordance with the requirement at FAR 8.4 and GSAR 538.7104-3(b)(ii), the undersigned approving official for this justification hereby determines the circumstance cited above at #4, Authority and supporting rationale, applies to this acquisition.

11. Contracting Officer's Certification and Approval

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

EMMANUEL WILSON Digitally signed by EMMANUEL WILSON
Date: 2026.06.10 09:04:31 -04'00'

Emmanuel Wilson
Contracting Officer

Date

12. Approval for Justifications.

Approve:

MILDRED SHINGLER Digitally signed by MILDRED SHINGLER
Date: 2026.06.12 09:36:31 -04'00'

LaVonne Shingler
FSA Advocate for Competition

Date