JUSTIFICATION AND APPROVAL
FOR OTHER THAN FULL AND OPEN COMPETITION

Completion Instructions: The Department of Health and Human Services (HHS) has established a standard template for the preparation of a J&A for Other Than Full and Open Competition. If this is an 8(a) set-aside, please note this form is not required unless the acquisition is valued (including all options) at greater than $22 million. This template is NOT applicable for actions using simplified acquisition procedures (FAR Part 13), Federal Supply Schedule orders (FAR 8.4) or task or delivery orders subject to fair opportunity (FAR 16.505).

Tailor all aspects of this template to the individual acquisition. Consult FAR Subpart 6.3 for guidance. An addendum may be added in case additional space is needed.

When this document is printed, the blue italic instructions are automatically deleted on the printed version.

Acquisition Title:	Chronic Kidney Disease Epidemiology in the Military Health System
Agency:	CDC
Acquisition Year (FY):	2026
Author and Title:	

2. Description of Action:

Nature:	☐ New Requirement	☑ Follow-on Requirement	
	☐ Modification to Existing Purchase Order/Contract Number:		
Pricing:	☑ Firm-Fixed Price	☐ Time & Materials	Cost
	☐ Other:		
Funds:	☐ OMA	☐ Other Funds:	

Name of Proposed Contractor(s): Henry Jackson Foundation for the Advancement of Military Medicine, Inc.

Street Address: 6720-A Rockledge Drive

City, State, Zip: Bethesda, MD 20817

3. Description of Services or Supplies:

Basis for Approval (FAR 6.303-1(d)):	☑ Individual Basis	☐ Class Basis

The total estimated value of the proposed action, including all options is $

As applicable, briefly describe the services or supplies required to meet the agency's needs, including make & model number where appropriate. Include quantities of supplies or period of performance for services. Provide information for any options included. If the action is a modification to an existing contract, distinguish clearly between the work covered by the original contract and the work to be obtained by the proposed modification.

Period of performance: July 31, 2026 - July 30, 2030 (base year +3 option years). Severable services.

This project provides ongoing access to and evaluation of important public health surveillance data from the Department of Defense (DoD) electronic health records system, critical to the U.S. Chronic Kidney Disease (CKD) policy efforts. It also allows for the comparison of DoD CKD metrics with Healthy People 2030 CKD indicators and goals and for delineation of specific objectives which

4. Authority and Rationale: Identify the statutory authority, FAR title and FAR citation permitting other than full and open competition. It may be one of the following most commonly used citations by the operating divisions of the Department of Health and Human Services (HHS), but other exceptions may apply per FAR Subpart 6.3.

Actions other than simplified acquisition procedures (select only one and provide an explanation):

☑ *FAR 6.302-1:* Only one responsible source and no other supplies or services will satisfy agency requirements, 41 U.S.C. 3304(a)(1)

Explain why the intended contractor is the only responsible source who can provide the required supplies or services. Discuss the unique capabilities, expertise, etc. that support the lack of competition/why no other type of supplies or services will satisfy agency requirements. Explain factors/unique qualifications such as proprietary data or exclusive licensing rights, if applicable. When competition is limited to items particular to one manufacturer, this justification must explain why the particular brand name, product, or feature is essential to the Government's requirements, and that market research indicates other companies' similar products, or products lacking the particular feature, do not meet, or cannot be modified to meet the agency's needs in accordance with FAR 11.105. If in connection with a follow-on contract for continued development or production of highly specialized equipment, detail the substantial duplication of cost or unacceptable delays.

Template refers to FAR 6.302-1. FAR RFO updated reference is 6.103-1. HJF is the only responsible source capable of performing this requirement because the effort relies on access to Military Health System (MHS) data maintained under Department of Defense (DoD) authorities and existing inter-agency data-sharing agreements involving HJF and the Uniformed Services University of the Health Sciences (USUHS). Researchers affiliated with USUHS have developed and maintain an established analytic database derived from these data sources

☐ *FAR 6.302-2:* Unusual and compelling urgency, 41 U.S.C. 3304(a)(2)

If unusual and compelling urgency is the basis for the justification, explain the chronological events leading up to the requirement and explain why time constraints cannot permit even a limited competition. Describe the detrimental effects/ serious injury to the mission of the requiring activity or to the government, financial or otherwise, that will result if this justification is not approved. Describe impact of required delivery/performance date. Describe the detrimental effects/ serious injury to the mission of the requiring activity or to the government, financial or otherwise, that will result if this justification is not approved and the product or service cannot be provided by the intended sole source contractor. Failure to plan for expiring funds is not a valid reason for citing this exception. May not exceed one year, including all options, unless the head of the agency determines that exceptional circumstances apply.

Not Applicable

☐ *FAR 6.302-5:* Authorized or Required by Statute, 41 U.S.C. 3304(a)(5)

Provide a citation to the statutory authorization and a brief description of its content, or identify the specified source or other agency.

Not applicable

☐ Other (See FAR Subpart 6.3 for additional authority)

Provide the authority and citation to the applicable section of FAR 6.3.

Not applicable

Provide a full explanation to justify use of the exception.

Not applicable

***5.* Agency Actions to Take or Remove Barriers That Led to Other Than Full and Open Competition (If applicable):**

Describe the actions, if any, the agency may take to remove or overcome any barriers that led to the restricted consideration prior to any subsequent acquisition for the supplies of services is made. If no such actions have been taken, explain why.

The primary barrier to competition is the restricted access to Military Health System (MHS) data controlled under Department of Defense (DoD) authorities and existing data-sharing agreements supporting HJF and USUHS research activities. CDC will coordinate with DoD and program stakeholders to assess future opportunities to expand access mechanisms, standardize data-sharing procedures, and reduce reliance on incumbent-specific access arrangements. To foster future competition, CDC will initiate acquisition planning and coordination activities

6. Bridge Contracts:

For contract extensions or bridge contracts when a competitive follow-on is in the process of being developed, summarize history of current contract and explain the reasons for any delays in the acquisition. Include discussion of the milestones for the follow-on action; the milestones should be as efficient as possible. Discuss why it would be neither cost effective nor realistic to expect another contractor to perform during the brief interim period; include issues such as start-up costs, phase-in, transfer of GFP, recruitment and staffing, etc. If the action is because of a protest, provide a brief discussion of the protest including the date the protest was filed and the basis of the protest. Explain that the action will provide the minimum quantity or performance period.

Not applicable

7. Actions to Increase Competition:

Describe efforts made to compete the action, including whether a notice was or will be publicized as required by FAR Subpart 5.2 or which exception under FAR 5.202 applies. If a notice was publicized, discuss the number of written responses to the synopsis and the results of the assessment of the written responses. List sources, if any, that expressed, in writing, an interest in the acquisition. Provide rationale if interested sources were rejected. If applicable, state that no other sources have expressed interest, but all offers received shall be considered. Describe what actions will be taken to increase competition before subsequent acquisition of the supplies or services is required. You may state that an action is a one-time requirement, but if a similar requirement arises, every effort will be made to compete it to the maximum extent possible. If action is sole source because of proprietary data or licensing rights and there will be a continuing need for the requirement, there must be evidence that advanced planning has been initiated to overcome the barriers to competition, or there should be documentation to support an analysis that replacement costs/licensing purchase costs outweigh the benefits of competition. If the action is a contract extension or bridge, explain actions to compete the follow-on. If action is an urgent new requirement and a competitive follow-on is anticipated, explain that efforts are underway to facilitate a full and open competition.

The Government intends to publicize the proposed contract action in accordance with FAR 5.201 and FAR 6.301. Any capability statements or responses received will be evaluated to determine whether another responsible source can satisfy the Government's requirements. Information received regarding potentially capable vendors will be shared with DoD and relevant stakeholders to assess whether future expansion of MHS data access or related agreements could support broader competition. Future acquisitions will also include additional market research and early acquisition planning to evaluate opportunities for increased competition if DoD expands access to MHS data systems and related agreements.

8. Market Research:

Describe the extent of the market research conducted to identify all qualified sources and the results thereof. "Market Research" is defined as those attempts you made to ascertain whether other qualified sources exist, and can include contact with knowledgeable experts regarding similar or duplicate requirements, contact with industry, results of a sources sought synopsis, or draft solicitations. Research of the marketplace may consist of written, electronic (i.e. email) telephonic, or world wide web inquiries. Lack of advanced planning is not an acceptable reason for the lack of market research, but true urgency may necessitate abbreviated market research that is limited to readily available historical and commercial information. If action is a contract extension or bridge contract, describe the market research efforts underway or completed for the follow-on. See FAR 10.002(b)(2).

Market research was conducted in November 2025 to identify concerns capable of meeting the Government's requirements. Research included review of incumbent performance, assessment of organizations with relevant epidemiological and analytic capabilities, evaluation of existing DoD and USUHS data access arrangements, and analysis of potential vendors' ability to support sustained MHS Data Repository (MDR)-based surveillance activities. The Government evaluated several organizations, including Henry Jackson Foundation (HJF) (incumbent), MITRE, and Battelle. Market research determined that while MITRE and Battelle possess general analytical capabilities, their capabilities are oriented toward discrete analytical efforts rather than sustained MDR-based surveillance activities

9. Procurement History:

Purchase order or contract number:

Was action competed?	☐ Yes	☑ No

If action was not competed, state the cited authority, summarize rationale, and describe the actions that were supposed to be taken to increase competition and the results thereof:

Purchase Order/Contract No. REDACTED was previously awarded to HJF on a sole source basis under FAR 6.302-1, Only One Responsible Source and No Other Supplies or Services Will Satisfy Agency Requirements. The HJF was selected as the venue for the proposed study because of their unique access to the MHS data. Researchers at the Uniformed Services University of the Health Sciences have developed an analytic database that is readily accessible. It is in the government's best interest to take advantage of this data use agreement between HJF and DoD. The effort relies on MHS data controlled under DoD authorities and existing agreements with HJF

10.Additional Information to support the justification:
If applicable, explain why technical packages or specifications to facilitate competition were not developed or available; describe actions taken to remedy the situation.

Not applicable

11. Technical / Requirements Certification: ***By my signature below,*** I certify that the supporting data included in this J&A is accurate and complete.

Program Manager	
Name:	
Position Title:	
Email address:	
Phone:	
Program Manager Supervisor (or one level above Program Manager)	
Name:	
Position Title:	
Email address:	
Signature:	RUI LI -S Digitally signed by RUI LI -S Date: 2026.04.24 10:59:53 -04'00'
Date:	

12. Fair and Reasonable Price/Cost Determination: As Contracting Officer, by my signature below, I hereby determine that the anticipated price/cost to the Government for this contract action will be fair and reasonable.
Provide the basis for this determination, e.g., describe techniques to be used to determine fair and reasonable price (FAR Subpart 15.402), such as price analysis, cost analysis, cost realism. Per FAR Subpart 15.403-4(a)(1), the threshold for obtaining cost or pricing data is $750,000.

Name:		Phone:	
Signature:		Date:	

13. Contracting Officer's Approval (Required for proposed contract not to exceed $700,000 (value calculated including all options)): I hereby certify that this justification is accurate and complete to the best of my knowledge. I approve this justification subject to availability of funds, and provided that the services and supplies herein described have otherwise been authorized for acquisition.

Name:	Ann Bonis	Phone:	770-488-4409
Signature:	ANN BONIS -S Digitally signed by ANN BONIS -S	Date:	05/04/2026

14. Legal Review:

All J&As greater than $68 million must have a legal review from the General Law Division of the Office of the General Counsel prior to sending it to the Department.

15. OPDIV Competition Advocate Approval (Required for proposed contract over $700,000 but not exceeding $13.5 million (value calculated including all options)):

I have reviewed this justification and find that it adequately supports other than full and open competition.

Name:	Terrance Perry	Phone:	770-488-8424
Signature:	Terrance Perry -S Digitally signed by Terrance Perry -S Date: 2026.06.12 15:07:23 -04'00'	Date:	

All J&As greater than $68 million must have a review from the Office of Small & Disadvantaged Business Utilization (OSDBU) prior to sending it to the Department. The OSDBU at their discretion may review any J&A.

16. Office of Small and Disadvantaged Business Utilization Review: (Required for contracts exceeding $68 million (value calculated including all options)):

Concur:	☐	Non-Concur:	☐
Name:		Phone:	
Signature:		Date:	

17. OPDIV HCA Approval (Required for proposed contract over $13.5 million but not exceeding $68 million (value calculated including all options)):

Name:		Phone:	
Signature:		Date:	

18. Department Competition Advocate (Required for contracts exceeding $68 million (value calculated including all options)):

Concur:	☐	Non-Concur:	☐
Name:		Phone:	
Signature:		Date:	

(The below approval paragraph is required if the cumulative contract value, including all options, exceeds $68 million.)

19. HHS Senior Procurement Executive (SPE) Approval:

Based on the foregoing justification, I hereby approve other than full and open competition for the above stated procurement, subject to the availability of funds, and provided that the services herein described have otherwise been authorized for acquisition.

State supplies/services being procured:

State the full statutory authority and FAR cite and title, consistent with paragraph 4, e.g. 41 U.S.C. 3304:

Name:		Phone:	
Signature:		Date:	