Sole Source Justification (SSJ)
FAR 8.401 & GSAM/R 538.7104-3(b)(1)

1. Acquisition Title:	National Human Trafficking Training and Technical Assistance Center (NHTTAC)
Division:	Administration for Children and Families (ACF), Office on Trafficking in Persons (OTIP)
Contracting Activity:	Department of Health and Human Services (HHS), Office of the Assistant Secretary for Financial Resources (ASFR), Office of Mission Acquisition Solutions (OMAS)
Author:	Chelsea Dean, Contracting Officer, HHS/ASFR/OMAS Christopher Capers, Contract Specialist, HHS/ASFR/OMAS

2. Nature and/or Description of the Action being Approved: The ACF requests approval of a non-competitive, out-of-scope bilateral modification to General Services Administration (GSA), Multiple Award Schedule (MAS) Task Order 75ACF121F80049 with ICF Incorporated, L.L.C. Conducted in accordance with GSA's modernized Federal Supply Schedule (FSS) ordering procedures under GSAM/R 538.7104-3(b)(1)(i), this SSJ is predicated on unusual and compelling urgency this critical bridge action will extend the period of performance by six months, from September 30, 2026, to March 29, 2027, utilizing fiscal year 2026 funds. To remain aligned with the ACF governance framework, it is critical to meet the program's operational demands and milestone award execution target of June 2026. Because the original competitively awarded task order did not evaluate or price a six-month extension option under its RFO FAR 52.217-8, this proposed action represents a new, out-of-scope sole-source modification subject to Competition in Contracting Act (CICA) standards. Proceeding under any other acquisition strategy is highly impracticable; any disruption in these specialized program services would result in immediate, severe operational failure and compromise ACF's regulatory mission. This six-month sole-source bridge represents the absolute minimum duration required to safeguard business continuity and mitigate material risk to the Government while the agency executes the active, competitive transition of these services.

3. Description of Supplies and/or Services:
The proposed action will extend Task Order 75ACF121F80049 by six months to guarantee the uninterrupted administration of the NHTTAC. OTIP, this contract fulfills critical statutory mandates to strengthen the nation's health and human services response to human trafficking. The contractor delivers highly specialized training and

technical assistance to healthcare providers, social services professionals, and federal, state, and local officials, ensuring direct compliance with federal anti-trafficking laws.

4. Authority Cited and Rationale: Authority of the FSS Program, Title III of the Federal Property and Administrative Services Act of 1949 (41 U.S.C. 251, et seq.); Title 40 U.S.C. 501, Services for Executive Agencies, as implemented at RFO FAR 8.401 and GSAM/R 538.7104-3(b)(1).

a. GSAM/R 538.7104-3(b)(1)(i)- The need is of such unusual urgency that following the procedures would result in unacceptable delays in fulfilling that need.

The NHTTAC is the primary operational vehicle used by the OTIP to execute federal anti-trafficking laws. A lapse in these services would directly violate the following statutory mandates:

- 22 U.S.C. 7105(c)(4): Mandating that HHS train personnel and state/local officials to identify and protect victims of severe forms of trafficking.
- 22 U.S.C. 7104(b): Requiring HHS to support public awareness activities for potential victims of human trafficking.
- 42 U.S.C. 300d-54: Directing HHS to establish and operate the SOAR to Health and Wellness Training Program to train health care and social service providers.

The urgency driving this action is rooted entirely in the critical nature of OTIP's programmatic mission, the severe operational injury that would result from a service lapse, and high-level leadership directives. Reflecting the critical nature of this requirement, this extension was formally established within the ACF organizational structure on March 25, 2026, based on pressing operational needs and the urgency of the mission. NHTTAC is currently executing a large-scale, highly complex redesign of core training modules and technical assistance content. These specific updates are urgently required to meet the directives of the Executive Order on Fostering the Future for American Children and Families and ACF's Wildly Important Goal (A Home for Every Child). This redesign directly equips child welfare agencies with the immediate tactical ability to identify and respond to human trafficking within the foster care system. Any disruption to the current period of performance would abandon this in-flight redesign mid-cycle, fragment training delivery, and instantly sever vital technical assistance to healthcare and social service professionals nationwide. This six-month bridge is urgently required to finalize this deployment, secure an orderly transition, and prevent a catastrophic gap in legally mandated anti-trafficking operations.

Executing this six-month extension yields a profound secondary benefit to the agency's mission. By locking in this extension bridge by June 30, 2026, OTIP will be able to immediately redirect approximately [redacted] in previously allocated procurement funds directly into direct service grant programs. Securing this bridge is therefore critical not only for maintaining training operations, but for ensuring these vital funds are rapidly reallocated to programs directly serving survivors of human trafficking before the end of the fiscal year.

5. Market Research: As part of the acquisition strategy for this action, market research was completed and assessed the commercial marketplace's ability to fulfill this specific six-month bridge extension. While multiple vendors possess general capabilities in training and technical assistance, the market research concluded that no alternative vendor can viably assume these highly specialized duties for a strictly six-month duration in such an urgent timeline. Specifically, the market research revealed that the required administrative lead times for onboarding, combined with the complexities of inheriting an in-flight redesign project, mean any new vendor would consume the entire six-month period simply trying to transition. Consequently, the incumbent is the only source capable of executing this extension without causing serious operational injury to ACF and its mandatory mission alignment.

Further, the market research findings are firmly supported by the principles of the CICA and Government Accountability Office (GAO) jurisprudence regarding urgency-based bridge contracts. GAO precedent consistently recognizes that when competing a short-term requirement results in a "substantial duplication of cost to the Government that is not expected to be recovered through competition" or "unacceptable delays in fulfilling the agency's statutory requirements," a sole-source bridge to the incumbent is legally justified. Pursuant to GSAM/R 538.7104-3(b)(1)(i), the market research confirms that attempting to compete this interim requirement contradicts federal procurement best practices and exposes the Government to unacceptable operational risk. To quantify the findings of this market research, the following comprehensive risk assessment was assessed. As detailed in the matrix below, utilizing any vendor other than the incumbent for this six-month period introduces severe technical, financial, and administrative vulnerabilities that cannot be mitigated through competition.

Risk Domain	Risk Event & Description	Inherent Risk *(If Competed)*	Mitigation Strategy *(Sole-Source Extension)*	Residual Risk

Mission & Operational	A service gap halts required anti-trafficking training for child welfare agencies, directly violating 22 U.S.C. 7105 and ACF Wildly Important Goals.	SEVERE	Retain incumbent to maintain continuous, uninterrupted operations, ensuring zero downtime for federal/state stakeholders.	LOW
Financial & Cost	Duplication of costs incurred; loss of timeline required to reallocate [redacted] to direct survivor services.	HIGH	Eliminates redundant transition costs and secures the immediate contractual mechanism required to execute the [redacted] programmatic reallocation.	LOW
Schedule & Administration	Administrative lead time for a new vendor to achieve [redacted] requirements, and system accesses consumes majority of the period.	SEVERE	Incumbent staff already possess all required credentials, knowledge, and system accesses, ensuring 100% productive labor from day one.	LOW

Based on current market research and the quantified risks outlined above, the incumbent is the sole capable entity positioned to execute this six-month performance period. Forcing competition for this brief bridge would paralyze statutory anti-trafficking operations, incur unrecoverable redundant costs, and represent an irresponsible stewardship of taxpayer resources.

6. Procurement history:

Procurement Field	Iteration 1 (NHTTAC I)	Iteration 2 (NHTTAC II - Current)
Contractor	ICF International, Inc.	ICF Incorporated, LLC *(formerly ICF International, Inc.)*
Contract or Order Number	HHSP233201500071I	GS00F010CA/75ACF121F80049
Award Date & Period of Performance	September 30, 2016 - September 29, 2021	September 30, 2021 - September 29, 2026
Value (Including All Options)	$500,000,000.00	$14,158,285.91
Competitive Status	Competed Under FSS Procedures	Competed Under FSS Procedures (One Quote Received)
Contract Type	INDEFINITE DELIVERY / INDEFINITE QUANTITY	Time and Materials (T&M)

7. <u>Actions to Foster Competition for Future, Similar Requirements:</u>

OTIP, in direct coordination with the OMAS, has proactively structured and initiated the competitive long-term acquisition strategy for the third iteration of NHTTAC. The follow-on procurement is actively in the pre-solicitation phase. This six-month extension is not a substitute for competition, but rather a deliberate, strategic bridge designed to secure a mandatory operational overlap and finalize urgent, in-flight training redesigns prior to the onboarding of the competitive awardee. To ensure maximum market participation and foster robust competition for the follow-on award, OTIP conducted a comprehensive, forward-looking review of the program's

requirements. As a result, OTIP strategically descoped the upcoming Statement of Work (SOW) by completely decoupling the legacy Information Technology (IT) component from the core mission requirements. By isolating the new solicitation purely to highly specialized anti-trafficking training and technical assistance, the Government has intentionally lowered the barrier to entry. This proactive optimization invites a significantly broader vendor base to compete, specifically entities that possess human trafficking expertise but may have been previously precluded by complex IT infrastructure requirements.

The Government remains fully committed to leveraging the competitive marketplace. By executing this short-term bridge, ACF ensures the competitive awardee will inherit a stable, fully updated technical architecture, setting the conditions for immediate success upon transition. For all future iterations of this statutory requirement, the Government will continue to conduct rigorous market research and employ full competitive procedures to the maximum extent practicable.

8. Additional Information or Other Facts: To safeguard operational continuity and ensure the uninterrupted execution of statutory mandates, this requirement was officially integrated into the ACF governance framework [redacted] to satisfy critical operational timelines, allow for a secure transition period, and prevent an imminent, unacceptable gap in vital anti-trafficking services.

Due strictly to unforeseen, offline procurement system outages and technical processing delays encountered in June 2026, the bilateral modification and final award execution was shifted to early July 2026. This minor administrative adjustment does not alter the underlying urgency of the requirement, nor does it impact the target transition timeline leading up to the proposed extended September 29, 2026, period of performance expiration.

9. Technical or Requirements Program Management Certification: I certify that the supporting data under my cognizance which are included in the justification are accurate and complete to the best of my knowledge and belief.

10. Best Value Determination: As the contracting officer, I hereby determine that the anticipated price to the Government for this contract action represents the best value for the Government.

This determination is based on ACF's programmatic review and a separate price analysis, which confirmed that the contractor's proposed By retaining the incumbent, the Government avoids the substantial, unrecoverable duplication of transition costs while ensuring the uninterrupted execution of statutory, urgent, anti-trafficking training mandates and the deployment of the in-flight training module redesign. From a pricing perspective, Furthermore, in strict accordance with FSS ordering procedures and Contracting Officer support of Executive Order 13589 (*Promoting Efficient Spending*), the Government actively sought further price reductions for this specific bridge requirement. In response, the contractor submitted a quote that incorporates a highly favorable in total discounts . Therefore, based on the validated technical sufficiency and the overall operational risk mitigation achieved, the price is determined to be fair, reasonable, and best value to the Government.

11. Contracting Officer (CO) Certification and Approval: I hereby certify that this justification is accurate and complete to the best of my knowledge.