Sole Source Justification (SSJ)

FAR 8.401 & GSAM/R 538.7104-3(b)(1)

1. Acquisition Title: Human Capital Strategic Advisory Support Services
Division: Administration for Children and Families (ACF)
Contracting Activity: Office of Mission Acquisition Solutions (OMAS)
Author: Carolyn C. Taylor

2. Nature and/or Description of the Action being Approved: ACF requests a sole-source task order against the General Services Administration (GSA) Multiple Award Schedule (MAS) contract, 47QTCA22D001A, with the contractor listed in the table below. This acquisition is conducted under the Federal Supply Schedule (FSS) Program using the ordering procedures set forth in GSA Manual/Regulation (GSAM/R) Subpart 538.71. The Government projects an award for July 2026 using Fiscal Year (FY) 2026, Operations and Maintenance Appropriations funds.

Contractor: MPOWER INCORPORATED (mPower)				
Business Size: Small Business Administration (SBA) Certified Women-Owned Small Business (WOSB)				
Schedule Contract Number: 47QTCA22D001A				
Performance Period	**Duration**	**CLIN/Description**	**Contract Type**	**Total**
Base Period	12 months	0001 - Human Capital Services	FFP	[redacted]
Base Period	12 months	0002 - Optional Surge Support	LH	
Option Period 1	12 months	1001- Human Capital Services	FFP	
Option Period 1	12 months	1002 - Optional Surge Support	LH	
Option Period 2	12 months	2001- Human Capital Services	FFP	
Option Period 2	12 months	2002 - Optional Surge Support	LH	
			Estimated Total Dollar Value:	

3. Description of Supplies and/or Services: This requirement provides senior-level Human Capital Strategic Advisory Support Services to the ACF. The contractor will deliver specialized expertise in enterprise workforce planning, human capital strategy, and organizational design to support ACF's ongoing transformation and long-range workforce initiatives. The scope includes high-impact advisory services across strategic workforce planning, talent management, organizational effectiveness, and senior-level human capital governance. Under this requirement, the contractor will furnish a seasoned human capital strategist capable of operating at an executive level and providing technically sophisticated counsel on complex human capital matters aligned to ACF's statutory authorities and operational environment.

- Designing, assessing, and advising on enterprise-level workforce planning and optimization strategies
- Supporting agency-wide human capital initiatives that require advanced federal policy expertise and organizational change leadership

- Providing executive-level advisory support on talent management frameworks, workforce readiness, and strategic human capital integration
- Delivering optional surge support to address high-priority workload demands, emerging issues, or specialized analyses.

The period of performance includes a 12-month base period with two 12-month option periods, structured at approximately 32 hours per week with surge capacity available as needed. To perform these services at the required level, the contractor must demonstrate specialized technical competencies and deep proficiency in federal human capital strategy, including experience advising executive leadership within Department of Health and Human Services (HHS) and ACF's unique organizational environment. The work demands sustained, high-complexity advisory support informed by expert knowledge of ACF's statutory mission, program structures, delegated authorities, and Department-specific human capital frameworks. This is a long-term, highly specialized advisory requirement that necessitates a contractor with advanced strategic capabilities, mastery of HHS/ACF human capital operating models, and a proven record of supporting enterprise-level human capital functions within complex federal environments. These attributes ensure continuity, accuracy, and mission alignment across ACF's workforce strategies and define the minimum qualifications required for successful performance.

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).

GSAM/R 538.7104-3(b)(1)(ii)- Only one source is capable of providing the products, services, or solution required at the level of quality required because the products, services, or solutions are unique or highly specialized.

The Government's minimum requirements for this effort involve a uniquely specialized set of executive-level human capital competencies that are not broadly available among Federal Supply Schedule (FSS) vendors. The effort requires a single senior Human Capital Strategist with demonstrated mastery in enterprise workforce planning, organizational design, and federal human capital governance, specifically within the HHS and the ACF. These requirements reflect a high-complexity, long-term advisory need rather than a standard consulting engagement. To meet the Government's minimum quality threshold, the contractor must provide an SME with the following non-substitutable qualifications:

- Executive-level federal human capital leadership experience, including prior service advising or operating at the Senior Executive Service (SES) level.
- Demonstrated expertise with HHS-specific governance structures, internal workforce policies, and multi-OPDIV operational processes, which directly inform ACF's human capital environment.
- Direct, institutional understanding of ACF's organizational structure, stakeholder environment, and human capital frameworks, necessary to ensure that strategic recommendations align with ACF's statutory authorities and mission execution.
- The ability to autonomously develop SES-level strategic deliverables, without reliance on multi-tiered support teams commonly used in traditional consulting models.

Market research confirms that typical FSS vendors offer segmented or siloed consulting services, such as general organizational development or technical workforce analytics, but do not provide the integrated combination of:

- SES-caliber executive advisory skill;
- HHS- and ACF-specific operational knowledge; and
- Proven ability to function as a single embedded strategist rather than a team-based commercial model.

These structural capability gaps were identified across the Request for Information (RFI) and Notice of Intent (NOI) responses reviewed during market research. Among all sources reviewed, mPower is the only vendor demonstrating the required convergence of qualifications. Their proposed [redacted] This record provides unique, non-replicable familiarity with ACF's governance framework, workforce systems, and enterprise human capital priorities, a level of specialized experience not evidenced in any other capability statements submitted. Based on this analysis, the Government determined that only mPower is capable of meeting the minimum requirements at the required level of quality. This conclusion is grounded exclusively in the specialized nature of the services and the unique qualifications required in accordance with GSAM/R 538.7104-3(b)(1)(ii).

5. Market Research:

Between May and June 2026, the Government conducted comprehensive market research to determine whether any GSA MAS Category 541611 Schedule holders could meet the specialized requirements for senior executive-level Human Capital Strategic Advisory Support Services for ACF. The research included:

- Posting of a Request for Information (RFI 1814709) via GSA eBuy in May 2026.
- Posting of a Notice of Intent (NOI 1817618) to Sole Source via GSA eBuy in June 2026.
- Review of vendor capability statements submitted in response to both actions.
- Assessment of potential teaming, subcontracting, and phased transition scenarios to determine whether any alternative vendor could meet minimum Government requirements.

The RFI and NOI were posted via GSA eBuy, reaching all MAS 541611 Small Business Administration (SBA) Certified Women-Owned Small Business set-aside firms. The RFI and NOI each yielded four capability statements for a total of eight submissions. Each vendor's capability statement was independently reviewed on their ability to meet the requirement. The capability assessment included:

- Senior executive-level federal human capital leadership experience;
- ACF and HHS-specific human capital operational experience;
- Expertise in federal workforce planning, talent management, and personnel policy;
- Ability to provide a single senior-level strategist;
- Demonstrated capability to produce executive-ready strategic deliverables; and
- Familiarity with ACF's organizational structure, workforce systems, and mission-specific human

capital priorities.

The findings were as follows:

- All respondents demonstrated general or adjacent management consulting experience, but none met the full specialized capability required.
- No respondent presented ACF and HHS-specific governance or operational familiarity with ACF and HHS workforce structures.
- No respondent demonstrated prior experience aligned with ACF's human capital environment.

In all, vendors other than mPower possess experience in workforce-related consulting and advisory services, their submissions primarily reflected expertise in adjacent disciplines such as acquisition workforce support, organizational development, leadership facilitation, strategic planning, and change management. This disconnect between general consulting capabilities and the specialized nature of ACF's enterprise-level human capital environment establishes the foundation for significant operational, governance, and data risks should any alternative vendor be engaged. Responding firms did not demonstrate the depth of ACF- and HHS-specific institutional knowledge, nor the executive-level practitioner proficiency required to operate within ACF's complex governance models, interdependent workforce systems, and active enterprise initiatives.

Additionally, all alternative vendors described multiweek discovery periods involving institutional knowledge capture, stakeholder orientation, and baseline organizational assessments. Such activities are characteristic of traditional consulting onboarding rather than the advanced, autonomous executive advisory support the requirement demands. Throughout this readiness curve, such vendors would be unable to provide informed executive counsel, develop or execute integrated workforce models, or support leadership decision-making related to ACF's mission-critical human capital operations. Their initial performance would instead be limited to information-absorption activities such as learning unwritten governance structures, mapping political and organizational relationships, identifying key stakeholders, and diagnosing workforce challenges from a zero-knowledge baseline. Because these capability gaps directly affect core advisory functions and cannot be mitigated through subcontracting or phased transition, engaging a vendor without pre-existing ACF-specific institutional familiarity would result in sustained performance deficits and measurable disruption across interconnected human capital activities. The documented readiness curve and the absence of specialized expertise among alternative vendors clearly demonstrate that only one source can meet the Government's minimum requirements without introducing material operational risk or degrading mission support quality.

As a result of the above findings, no other vendor possesses the full combination of executive-level federal human capital leadership experience, ACF and HHS-specific governance and workforce management expertise, institutional understanding of ACF's structure and mission, and the ability to provide a single senior strategist capable of autonomous, executive-level advisory support. Accordingly, mPower is the only known source capable of meeting the Government's minimum specialized requirements at the level of quality mandated under GSAM/R 538.7104-3(b)(1)(ii).

6. Procurement history:

There is no prior acquisition history associated with this requirement.

7. *Actions to Foster Competition for Future, Similar Requirements:*

The Government recognizes that competition for this requirement was constrained primarily by two factors: the highly specialized nature of the advisory expertise needed and the concentration of institutional knowledge relevant to ACF's human capital environment. While these conditions made a sole-source acquisition appropriate under GSAM/R 538.7104-3(b)(1)(ii), ACF anticipates that future human capital advisory needs may continue to evolve. To ensure that subsequent procurements benefit from a competitive marketplace, the Government will take deliberate steps to reduce these barriers and strengthen the conditions for full competition.

A central part of this effort will be a structured and comprehensive knowledge-transfer process. Throughout the performance period, ACF will ensure that critical institutional knowledge, including frameworks, analytic tools, workforce planning models, governance documentation, and operational insights is captured, refined, and transitioned to Government ownership. This disciplined approach will allow ACF to retain the programmatic and technical context that previously resided with a limited set of experts. By ensuring that core methodologies and historical context are embedded within Government records rather than individual contractor experience, future vendors will be better positioned to compete on equal footing.

In parallel, ACF will engage in forward-looking acquisition planning that is both timely and market-shaping. Rather than suggesting any deficiency in prior planning, this reflects a proactive posture to broaden the competitive landscape. ACF will initiate early market research well in advance of any subsequent requirement, including targeted industry outreach and Requests for Information designed to identify qualified vendors with emerging federal and HHS-specific human capital capabilities. This approach allows the marketplace sufficient time to develop or demonstrate the specialized competencies required for comparable advisory support.

ACF will also evaluate whether future needs are appropriately suited for competed approaches, including multi-award solutions or other mechanisms that encourage broader participation. This assessment will be informed by program trends, anticipated workload, and the level of specialization required, ensuring that procurement strategies reflect both mission needs and competitive best practices. Through disciplined knowledge transfer, proactive acquisition strategy development, and expanded engagement with industry, ACF will meaningfully reduce the institutional and technical barriers that limited competition for this procurement. These actions reflect a sustained commitment to fostering a robust and competitive environment for future, similar requirements.

8. Additional Information or Other Facts:
There are no additional facts or information.

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.

[redacted]

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 a comprehensive analysis of the data herein, market research and extensive discussions with ACF of the nature of their requirement to support executive leaders, organization readiness. Aside from the baseline cost savings [redacted] This approach completely avoids the significant costs and operational disruptions of a paid readiness curve that would be required for any other vendor, guaranteeing an immediate and fully productive return on investment from the first day of performance.

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

[redacted]

ELEVATED REVIEWS & APPROVALS

12. Advocate for Competition Review and Approval: I reviewed this justification and find that it adequately supports a sole source acquisition.

[redacted]