Control Number: [redacted]

JUSTIFICATION REVIEW DOCUMENT
FAR Part 6 Justification and Approval
for Other than Full and Open Competition - Federal Acquisition Regulation (FAR) Part 6.302-1 Program: Army National Guard (ARNG) Mission Command Training Support Program (MCTSP) Mission Training Complex Capabilities Support (MTCCS) II

Program/Equipment: This is a non-personal services contract to provide individual, leader, small unit, battle staff, and simulation-driven collective Mission Command (MC) training, technical, exercise, simulation, and organizational support for the ARNG MCTSP. The ARNG MCTSP currently operates six MTCs, each having its own designated region: MTC-Atterbury, IN, MTC-Chaffee, AR, MTC-Dodge, IA, MTC-Fort Indiantown Gap, PA, MTC-Gowen, ID and MTC-Leavenworth, KS.

Authority: 10 United States Code 3204(b)(B) as implemented in FAR Part 6.302-1, "Only one responsible source and no other supplies or services will satisfy agency requirements."

Amount: The estimated amount of this proposed action is $[redacted] for a seven (7) month period of performance.

Prepared by: [redacted]

Contracting Officer: [redacted]

Technical: [redacted]

Requirements: [redacted]

Controlled by: US Army
Controlled by: ACC-Orlando
CUI Category: Source Selection
Distribution/Limited Dissemination Control: FEDCON
POC: [redacted]

Control Number: [redacted]

Reviews: I have reviewed this justification and find it adequate to support other than full and open competition.

Program Manager/Program Executive Officer:

[redacted]

Signature: [redacted]

Legal Counsel:

[redacted]

Signature: [redacted]

Advocate for Competition:

[redacted]

Signature: [redacted]

Senior Contracting Official:

[redacted]

Signature: [redacted]

Control Number: [redacted]

FAR Part 6 Justification and Approval
for Other than Full and Open Competition

1. Requiring Activity: Army National Guard (ARNG) Mission Command Training Support Program (MCTSP)

2. Contracting Activity: Army Contracting Command – Orlando (ACC-ORL) 12211 Science Drive, Orlando, FL 32826-3224

3. Description of Action: The current ARNG MCTSP bridge contract, W900KK-25-C-0004, with Valiant Integrated Services, LLC (later renamed Valiant Global Defense Services, Inc). expires 21January 2026. This bridge contract followed the initial W900KK-22-F-0013 task order. Such initial task order was awarded to provide mission critical training to units to meet the National Guard's Mission Training Complex (MTC) requirements under Mission Training Complex Capabilities Support (MTCCS) I. Two (2) protests were filed in response to the following task order under MTCCS II, W900KK-25-F-A121. A stop-work order was issued to the awardee General Dynamics Information Technology on 2 September 2025. This bridge contract will establish a new C-type contract. The type of contract will be Cost Plus Fixed Fee and utilize FY26 OMA type of funds. The period of performance is not to exceed seven (7) months with one (1) base month and six (6) option months.

4. Description of Supplies/Services: The seven-month bridge with an estimated value of $[redacted], will provide critical MC Training Support Services (TSS) for the ARNG MCTSP effort. The ARNG MCTSP delivers individual and collective MC system training in Live, Virtual, and Constructive environments to Battalions (BNs), Brigades (BDEs), and Divisions (DIVs) throughout the 54 states, territories, and District of Columbia to aid Commanders in achieving their MC readiness objectives.

The ARNG MCTSP currently operates six MTCs, each having its own designated region: MTC-Atterbury, IN, MTC-Chaffee, AR, MTC-Dodge, IA, MTC-Fort Indiantown Gap, PA, MTC-Gowen, ID and MTC-Leavenworth, KS. The 6 Regions collectively incorporate the 50 states, 3 territories and 1 district. During the timeframe of the bridge, the MTCs will conduct over 2500 training events utilizing contractors. Without the bridge, it will impact Division and Brigade Combat Teams ability to achieve required readiness objectives prior to capstone training events, CTC rotations and Warfighters.

Period	***Period of Performance (POP)***	***Estimated Value***
Base	*22 January 2026 through 21 February 2026*	$[redacted]
Option 1	*22 February 2026 through 21 March 2026*	$[redacted]
Option 2	*22 March 2026 through 21 April 2026*	$[redacted]
Option 3	*22 April 2026 through 21 May 2026*	$[redacted]
Option 4	*22 May 2026 through 21June 2026*	$[redacted]
Option 5	*22 June 2026 through 21 July 2026*	$[redacted]

Option 6	*22 July 2026 through 21 August 2026*	*$[redacted]*

5. Authority Cited: 10 United States Code 3204(b)(B) as implemented in Federal Acquisition Regulation Part 6.302-1, "Only one responsible source and no other supplies or services will satisfy agency requirements."

6. Reason for Authority Cited:

a. Background: In response to the protests filed on the competitive order for follow-on services to the ARNG, it was determined that corrective action was necessary in the form of a reevaluation of proposals. In response to the proposed corrective action, the protests were dismissed on 30 September 2025. Re-evaluations, however, could not begin immediately. A lapse of appropriations resulted in the furlough of most government employees, including ones necessary to support the re-evaluation. The furlough did not end until 13 November 2025. Services must continue during the course of the re-evaluation. Only the incumbent contractor, Valiant Global Defense Services, Inc., can provide the services without incurring substantial transition costs and without unacceptable delays resulting in a break in service for the ARNG MCTSP effort. A seven-month bridge contract is required to ensure continuity of critical services for the ARNG MCTSP effort whilst the re-evaluations are performed, a new award is made and any follow-on protests are resolved. Options will be exercised only as needed.

b. Alternatives: The following are substitutionary courses of actions:

1) Allowing the Contract to expire. This is not a feasible option (see impact if not approved below).

2) Proceed with the award of the contested task order. This is not feasible due to the corrective action plan which resulted in dismissal of the protests.

3) Re-compete the requirement or award a sole source contract to a new contractor. This is also not feasible within the current, rapidly diminishing time frame. Initiating an entirely new competition for these complex and specialized services would be a lengthy process, easily extending beyond the current contract expiration date. Furthermore, identifying, soliciting, and awarding a sole source contract to a new contractor would still necessitate significant time for market research, justification approval, and contract execution. More critically, a new contractor would require substantial time to mobilize, establish operations, hire and on-board personnel with the highly specialized and often security-sensitive skill sets required for ARNG MCTSP mission command training, and become fully operational. This complex transition cannot be accomplished before the current contract expires, resulting in an unavoidable and detrimental gap in service and substantial duplication of costs.

c. Impact if not approved: This is a regular and recurring requirement for the Army, by which thousands of soldiers are trained throughout the year, at ARNG MCTSP MTCs. A lapse in services would immediately halt essential training activities across multiple locations, directly impacting soldier readiness and unit preparedness.

7. Efforts to Obtain Competition:

a. In July 2024, ACC-ORL published the draft Request for Task Order Proposal (RTOP) W900KK-25-R-ARNG, which provided detailed guidance on the submission requirements and technical criteria that potential bidders needed to meet for the ARNG MCTSP competition. Award was made in August 2025 and followed by two timely protests.

b. A formal Synopsis of Notice of Intent (NOI) to Issue a Sole Source Contract was published on SAM.Gov on 26 September 2025, with the contract award going to the incumbent, Valiant for ARNG MCTSP on a bridge. To date, no responses to the NOI were received; however, any bids, proposals, quotations or capability statements will be considered.

c. FAR clause 52.244-5, Competition in Subcontracting will be incorporated into the C-type contract. The same subcontracting opportunities within the current task order are projected for this seven-month contract.

8. Actions to Increase Competition: The MTCCs II task order W900KK-25-F-A121 was awarded on 21 August 2025. The incumbent filed a protest on 2 September 2025 and another vendor filed a secondary protest on 22 September 2025. This bridge will provide requirement coverage of continued performance during corrective action for the new award. As this extension is necessary to complete the competition process, no additional efforts were identified to increase competition.

9. Market Research: Market research for the original task order competition was previously performed as follows: On 6 December 2023, the ACC-ORL awarded the base contracts for the MTCCS II MATOC to support TSS operations of the Army's MTCs worldwide. Fourteen Contractors, of which six are Large Businesses and eight are Small Businesses, were awarded a contract on the MTCCS II MATOC and are authorized to participate in acquisitions for operations of Army MTC's. The MATOC is comprised of two Pools, an Unrestricted Pool which is comprised of the six Large Businesses and a Restricted Pool which is comprised of the eight Small Businesses.

A Site Visit/Industry Day and Request for Information was held at Fort Indiantown Gap, PA on 9 July 2024, with all six vendors of the Unrestricted Lot in attendance. Due to the size, geographical disbursement of the training sites for the ARNG, and the contract performance risk requires the use of the Unrestricted Pool and all the vendors in the Unrestricted Lot of the MTCCS II Contract showed interest in competing for the task order under protest.

In December 2024, an additional Request for Information (RFI) was issued to both the Restricted and Unrestricted Lots. This RFI aimed to assess the Restricted Lot's capability to meet the specified requirements and to validate the ongoing strategy of solely utilizing the Unrestricted Lot.

No additional market research has been performed because the reason for the extension of the contract is to allow for completion of the competition that began following the original market research.

10. Interested Sources: The current bridge contract ends 21 January 2026. Due to the protest filled under the newly awarded task order services the requirement under MTCCS II, continuation of performance with the current ARNG MCTSP contractor is necessary to avoid a break in service and ensure the customer can execute planned training and throughput requirements.

11. Other Facts:

a. Procurement history.

The support requirements currently being provided for the ARNG MCTSP Effort is on the MTCCS task order W900KK-22-F-0013, which was competed on the Unrestricted Lot of the MTCCS MATOC. The task order was awarded to Valiant Global Defense Services on 04 February 2022. The previous ARNG MCTSP Effort was also a task order competed on the MTCCS MATOC, W9000KK-18-D-0003 0002. The task order was awarded to Cubic Global Defense on 28 August 2018.

Two (2) protests were filed in response to the following task order under MTCCS II, W900KK-25-F-A121. A stop-work order was issued to the awardee General Dynamics Information Technology on 2 September 2025. Corrective action has been approved to be taken towards both protests and thus were dismissed by GAO pending follow through.

In October 2025, under Mutual Agreement of Parties, the current bridge contract was extended by 30 days through 21 November 2025 to allow continuation of services whilst the protest corrective action is being completed, and due to lapse of appropriation of FY26 funds. Another 60 day extension is currently being executed under the same authority through 21 January 2026.

b. Other facts. Not applicable.

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12. Technical 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.

Signature [redacted]
[redacted]
Contracting Officer's Representative

13. Requirements 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.

Signature [redacted]
[redacted]
Division Chief of Training

14. Fair and Reasonable Cost Determination: I hereby determine that the anticipated cost to the Government for this contract action will be fair and reasonable. This requested contract action is a continuation of an award that was adequately competed prior, and the Independent Government Estimate is in line and based on established pricing. However, since this bridge action will be awarded on a sole source basis, and exceed the certified cost and pricing threshold, the Government will conduct a cost analysis and require submission of certified cost or pricing data in the format indicated in Table 15-2 of FAR 15.408.

Signature: [redacted]
[redacted]
Contracting Officer

15. Contracting Officer Certification: I certify that this justification is accurate and complete to the best of my knowledge and belief.

Signature: [redacted]
[redacted]
Contracting Officer

Control Number: [redacted]

Approval

Based on the foregoing justification, I hereby approve the procurement of the Army National Guard Mission Command Training Support Program Mission Training Complex Capabilities Support Effort on an other than full and open competition basis pursuant to the authority of 10 United States Code 3204(b)(B) as implemented in Federal Acquisition Regulation Part 6.302-1 "Only one responsible source and no other supplies or services will satisfy agency requirements.", subject to availability of funds, and provided that the services and property herein described have otherwise been authorized for this acquisition.

Signature: [redacted]

[redacted]

Senior Contracting Official