[redacted]

Control Number: [redacted]

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

Program/Equipment: The United States Army Corps of Engineers, Huntsville Center (CEHNC) is the Assigned Responsible Agency (ARA) for providing operation and maintenance support to the Remedial Action Cost Engineering and Requirements (RACER) software. The RACER software is a Windows-based environmental remediation/corrective action cost-estimating system.

Authority: Title 10 United States Code (U.S.C.) §3204(a)(1) as implemented by Revolutionary Federal Acquisition Regulation (FAR) Overhaul (RFO) Part 6.103-1 – Only one responsible source and no other supplies or services will satisfy agency requirements.

Period of Performance (POP): 6 March 2026 – 1 September 2026

Amount: [redacted]

Prepared by:	[redacted] Contract Specialist, FTI-GEN Email: [redacted]	[redacted]
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Technical:	[redacted] Engineer, EMCX Email: [redacted]	[redacted]
Requirement:	[redacted] Project Manager, FTI-GEN Email: [redacted]	[redacted]

[redacted]
POC: Robert Marsh, 256-895-1049

[redacted]

Center/District Reviews

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

Project Manager:

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Program Manager E-mail: [redacted]
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Small Business:

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Legal Counsel:

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

1. **Requiring Activity:** U.S. Army Corps of Engineers (USACE), Huntsville Engineering and Support Center (CEHNC); located at 300 Secure Gateway SW, Redstone Arsenal, AL 35898.

2. **Contracting Activity:** U.S. Army Corps of Engineers (USACE), Huntsville Engineering and Support Center (CEHNC); located at 300 Secure Gateway SW, Redstone Arsenal, AL 35898.

3. **Description of Action:** Approval is requested for a sole source stand-alone contract with AECOM Technical Service, Inc. (AECOM) located at 1300 S Grand AVE FL 9 Los Angeles, CA 90071, to perform a SOC 1 Type II examination of the Remedial Action Cost Engineering and Requirements (RACER) software and the Estimate Documentation Report (EDR)/Post Processor (PP) Utility following all American Institute of Certified Public Accountants (AICPA) standards and mandates. The Government will award a single Firm-Fixed-Price (FFP) service contract from 6 March 2026 – 1 September 2026 valued at [redacted]. The contract will be funded with FY26 Operations and Maintenance (O&M) funding. The North American Industry Classification System (NAICS) code will be 541511 – Custom Computer Programming Services.

4. **Description of Supplies/Services:** The RACER software is a windows-based environmental remediation/corrective action parametric cost estimating system. RACER was developed by the Air Force to support environmental sustainment, management, and remediation efforts. RACER has been developed for over 30 years by multiple Department of War (DoW) entities and companies. The RACER software is copyrighted by AECOM who is the most recent owner after purchasing the company that previously developed the software in partnership with the Air Force. The Government requires expert services to continue to develop RACER. The services to be provided include software development, ensuring cost models are up to date with the latest Cost Book, HNC cost data, area cost factors, escalation rates, per diem rates, and Equipment and Labor libraries. The continued use of RACER throughout the DoW for environmental remediation efforts as the estimating tool makes the software development services vital to the DoW to ensure accurate and complete estimates for correctly budgeting and executing these efforts. The SOC 1 Type II report shall be in accordance with AICPA Attestation Standards.

5. **Authority Cited:** Title 10 U.S.C. §3204(a)(1) as implemented in RFO 6.103-1, Only one responsible source and no other supplies or services will satisfy agency requirements.

6. **Reason for Authority Cited:** In accordance with FAR 6.103-1, it has been deemed that only one responsible source and no other supplies or services will satisfy agency requirements.

   a. Background: RACER was developed using both Government and contractor funds. Some software enhancements were the result of Government requests and others were from AECOM's decisions to independently enhance the software systems. The Government successfully negotiated and retained Government Purpose Rights (GPR) to the core system source code under the previous and current contracts and asserts the same rights for this procurement.

      The core system source code is the portion of source code for RACER that was not developed solely at the expense of AECOM and is also referred to as the "vanilla system." Access to the "core system source code" was a deliverable under the previous and current contracts. The core system source code would be necessary to increase competition and allow other vendors to develop a similar system. In order to obtain the "core system source code', the Government or a contractor would have to dismantle the current software version to remove the proprietary portions

independently developed. The core system would then be used and re-engineered and new software using the vanilla system and its non-proprietary components along with new enhancements could be delivered by a new contractor. The Government estimates that it would take 24-36 months for the current system to be dismantled, proprietary code removed, and software be re-engineered to reach current level of functionality by another vendor, making it unfeasible to deliver this requirement within the allotted period of performance.

The Government is currently working a follow-on effort to the current indefinite delivery indefinite quantity (IDIQ) contract for a permanent solution. This effort is to ensure continued development of the RACER software while a follow-on to the IDIQ is put in place. Given the above information, no other vendor can provide the services necessary with this stand-alone development action in the period of performance identified.

b. Alternatives: The only feasible alternative to this justification would be a suspension of development until the next iteration of the IDIQ is put in place. Suspension of development would also be detrimental given the number of DoW components that use RACER. A delay in services would result in inaccurate and incomplete estimations due to lack of current and up to date cost-book information included in the RACER software.

c. Impact if not approved: The PoP is set to complete 01 September 2026, which will assist in the material weakness downgrade. If not approved, no further progress will be made during FY26 and RACER will continue to contribute to the EDL material weakness and the goal of a clean FY26 audit will not be met.

7. **Efforts to Obtain Competition:** A sources sought announcement was published on SAM.gov on 13 March 2025 with a cutoff date of 14 April 2025. The announcement stated CEHNC was requesting information in order to determine the existence of viable commercial sources capable of providing the described software maintenance services. CEHNC requested sources that were interested and had the capability of providing parametric models for building construction, remedial action cleanup, and site work construction with rights to use the existing/current technology/software. Seven responses were received as a result of the announcement, with only one having a capability statement showing experience with parametric cost estimating systems.

A Request for Information (RFI) (Reference No: 528853) was posted on CHESS to all contractors in the ITES-SW2 program from 11 April 2025 to 22 April 2025. The RFI yielded 20 no bids and four no responses. Furthermore, CHESS determined it to be out of scope of its contract and stated a statement of non-availability (SONA) is not required.

a. Effective competition: Because this is a sole source action, effective competition is not applicable. The Contracting Officer published the notice required by RFO 5.101 on 11 Febraury 2026 and one response was received and was considered. Further, the Government will comply with the posting requirements of RFO 6.301 – availability of the justification within 14 days of award.

b. Subcontracting competition: Subcontracting opportunities do not exist for this requirement. Historically, the RACER software sustainment has been performed only by the prime contractor.

8. **Actions to Increase Competition:** The previous J&A for this requirement, Control No. CEHNC-19-1334, states the Government identified several possibilities to increase competition or transition to the Government performing this requirement. The Government successfully negotiated and received Government Purpose rights for the core system source code. The source code is being used to assess

the viability of Government performance or a competitive acquisition for the follow-on IDIQ currently being worked. However, since this is a short-term stand-alone action to ensure sustainment services are provided while the full follow-on acquisition is conducted and a permanent replacement is implemented, the Government is taking no specific actions under this acquisition to further increase competition. This action is a temporary solution to ensure continued services while the Government fully assesses its acquisition strategy for a future long-term contract.

9. **Market Research:** In accordance with (IAW) Army FAR Supplement (AFARS) 5139.101-90(a), the Computer Hardware Enterprise Software and Solutions (CHESS) program is the mandatory source for commercial IT purchases and IT services. These contracts are available to the Army, Department of Defense, and other Federal Agencies and are the first source considered for IT acqusitions. The Government wide point of entry, www.SAM.gov was also used for market research purposes as the next possible source to gain as much interest as possible.

   Market research was conducted from 13 March 2025 – 16 May 2025, which resulted in 1 potential source for this acquisition. This market research was validated and augmented in February 2026 with the positng of a notice of intent to sole source on 11 February 2026.

   a. A sources sought announcement was published on SAM.gov on 13 March 2025 with a cutoff date of 14 April 2025 resulting in seven responses. Six of the seven respondents were determined to be not capable of providing the requirements based on their responses. A capabilities brief was scheduled with [redacted], who provided a response that the Government could not fully determine capability from. After the capability briefing it was determined they too were not capable as they had no relevant environmental experience or construction estimating experience, no experience dealing with Government Purpose rights, and no direct experience with either RACER or PACES. As they had no direct experience with any of the specialized aspects of RACER, [redacted] was also determined to not be capable of providing the required services. Additionally a notice of intent to sole source was posted on 11 February 2026 with one response being received. The single response was form a consulting company that manages audits. Should ta third party audit manager be considered, AECOM and and independt auditor would still be required and agree to this strategy. Additionally, this third party audit manager would have costs associated with their effort making it a less cost effective approach.

   b. An RFI was posted on CHESS on 11 April 2025 and closed on 25 April 2025, Ref No. 528853, which resulted in 0 responses. CHESS stated the services were out of scope of the contract and a SONA was not provided.

   c. Internet searches of Required Sources of Supplies/Services were conducted February 2026, which resulted in 0 potential sources from listed sources. Screenshots are available in the Market Research in Paperless Contract File (PCF) system.

      1) Abilityone.gov
      2) UNICOR.gov
      3) Computer Hardware, Enterprise Software and Solutions (CHESS)
      4) DOW ESI OEM Search

   d. The incumbent, AECOM, was consulted and provided a draft solicitation to which they agreed to respond to in support of this requirement.

   Based on the above current market research, the most effective and only path to complete this acquisition is to solict a sole source FFP contract with AECOM for the required services as no other firm is capable of providing the required services.

10. Interested Sources:

As stated above, seven separate vendors provided written responses of interest in this acquisition. Of these seven responses, the Government assessed one as having the potential to provide the necessary services. The other responses provided no indication of experience with the same or similar services required to support RACER. The one potentially capable source is not considered for this acquisition as it is for the delivery of RACER software examination reports, for which the controls put in place and used by the current developer of the software are examined and tested, making AECOM, as the current and only developer of RACER, the only source of this requirement. Since this acquisition is not for a long-term replacement, it is determined no other source can reasonably provide the required services to deliver an American Institute of Certified Public Accountants (AICPA) System and Organization Controls (SOC) 1 Type II report.

11. Other Facts:

a. Procurement history:

This is not a new requirement.

Contract Number	Contractor	Procurement Method	Amount (est.)	Period of Performance
W912DY-07-D-0003	EarthTech	Sole Source FAR 6.302-1	[redacted]	28 August 2007 – 27 August 2012
W912DY-13-D-0115	AECOM	Sole Source FAR 6.302-1	[redacted]	28 September 2013 – 29 September 2019
W912DY-20-D-0082	AECOM	Sole Source FAR 6.302-1	[redacted]	31 August 2020 – 30 August 2025
W912DY-25-F-0122	AECOM	Sole Source FAR 6.302-1	[redacted]	1 April 2025 – 31 August 2025
W912DY-25-C-0020	AECOM	Sole Source FAR 6.302-1	[redacted]	30 September 2025 – 29 September 2026
W912DY-25-C-0025	AECOM	Sole Source FAR 6.302-1	[redacted]	30 September 2025 – 29 September 2026
W912DY-25-F-0431	AECOM	Sole Source FAR 6.302-1	[redacted]	30 September 2025 – 29 September 2026

c. Due to the sole source nature of this requirement, full and open competition is not possible, and this requirement has never been competed.

d. There have been no signification changes in this requirement from previous procurements and justifications.

e. There are no unusual patterns. This is the first time a stand-alone sole source contract has been used to fulfill the agency's needs outside of the long-term IDIQs

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.

[redacted]

[redacted]
Engineer

13. **Requirements Certification:** I certify that the supporting data under my cognizance, which are included in the justification, is accurate and complete to the best of my knowledge and belief.

[redacted]

[redacted]
Project Manager

14. **Fair and Reasonable Price Determination:** I hereby determine that the anticipated contract action will be fair and reasonable. Basis for fair and reasonable price determination will be conducted through historical prices, a cost/price analysis comparison of commercially available prices and the independent government estimate. In accordance with FAR 15.403-1(c)(3) certified cost and pricing data will not be required as a commercial item is being acquired.

[redacted]

Robert Marsh
Contracting Officer

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

[redacted]

Robert Marsh
Contracting Officer

Based on the foregoing justification, I hereby approve the procurement of SOC 1 Type II audit services on an other than full and open competition basis pursuant to the authority of 10 U.S.C. 3204(a)(1), as implemented in RFO 6.103-1, “Only One Responsible Source and No Other Supplies or Services Will Satisfy Agency Requirements.” The estimated value of the new contract is $855,784.83 with a PoP of 06 March 2026 – 01 September 2026. The approval is subject to the availability of funds and provided that the supplies and/or service herein described have otherwise been authorized for this acquisition.

[redacted]

ROBERT MARSH
Contracting Officer