[redacted]

SOLE SOURCE JUSTIFICATION
For Placing Orders and Establishing Blanket Purchase Agreements (BPAs) Against Federal Supply Schedule (FSS) Contracts
FAR Part 8.4 and GSAR 538.7104
Personnel Vetting, Adjudications, and Appeals Management System (PVAAMS)

1. **Agency and Contracting Activity:**
   The Defense Counterintelligence and Security Agency (DCSA), Procurement Solutions (PRS) Directorate, is the procuring activity for this action. The PRS Directorate proposes to enter into a contract action on a non-competitive basis with ICF Incorporated, LLC (CAGE Code 5M571) on behalf of the Program Acquisition Executive.

2. **Description of Action:** DCSA intends to award a bridge sole source contract to ICF Incorporated, LLC, the vendor selected for award under the recently competed competitive procurement, Order HS002125AE008/HS002126FE032 that is currently under protest. The contemplated bridge award is limited to the remaining PWS work: Task 1, Conduct Application Assessments, and Task 2, Software Development, Testing, Configuration, Integration, Modernization and Cloud Migration. Task 3, Software Operations and Continual Enhancement, has been removed from this requirement and will remain with the incumbent contractor or be handled under a separate contractual arrangement designated by the Government.
   This action is intended to permit immediate commencement of mission-critical modernization and development work required to avoid schedule harm to Trusted Workforce 2.0 (TW 2.0), while preserving the Government's ability to proceed consistent with the outcome of the protest. The interim action should be structured as a limited-duration, minimum-necessary award and should not include legacy DISS sustainment activities or other removed Task 3 activities.

   a. Type of Action: New Contract
   b. Contract Type: This will be a Firm-Fixed-Price (FFP) - Time and Material (T&M) hybrid contract. The NAICS code is 541519, Other Computer Related Services. The small business size standard associated with this NAICS code is $34M.

   c. GSA Contract: HS002125AE008
   d. Type of Funds: FY26 O&M

3. **Description of the Supply or Service**:
   a. Supply/Service: The required services include performing a comprehensive application assessment identifying components, source code dependencies, technical constraints, and the recommended approach for continued hosting in DCSA's Secure Cloud Landing Zone at DoD Impact Level 5. Additionally, the contractor will execute full-lifecycle sosftware engineering, DevSecOps development, testing, configuration, integration, modernization, cloud migration,

[redacted]

authorization support, and deployment readiness for Personnel Vetting, Adjudications, and Appeals Management System (PVAAMS).

The work includes modernizing and deploying a PVAAMS capability, supporting Risk Management Framework authorization and Authority to Operate activities, implementing DevSecOps and Continuous Integration and Delivery (CI/CD) practices, executing automated quality and security gates, supporting cloud deployment and environment promotion, coordinating with Government and third-party stakeholders, conducting demonstrations, producing documentation and training materials, maintaining source control and architecture artifacts, and ensuring appropriate licensing evidence.

b. Total Dollar Value, including Option: [redacted]
c. Period of Performance:
    i. Base Period: Six (6) months from Date of Award
    ii. Option Period 1: Six (6) months from Date of Option Exercise

4. Authority Cited and Supporting Rationale:

This acquisition is conducted under the authority of the Multiple-Award Schedule Program (41 U.S.C. 152(3), and 40 U.S.C. 501), as implemented by FAR 8.4 and substantiated by the following authority:

(a) **Urgent and Compelling Need (GSAR 538.7104-3(b)(l)(i)):** ICF was originally selected for this work via a competitive procurement awarded on May 27, 2026. However, a GAO protest filed on June 5, 2026 suspended performance. This interim action is strictly limited to foundational requirements—Task 1 (Application Assessments) and Task 2 (Software Development and Cloud Migration)—necessary to replace the obsolete 2010-era Defense Information System for Security (DISS) architecture, which is technically incapable of supporting TW 2.0 workflows.

Following standard ordering procedures or halting work during the protest period would result in unacceptable delays, causing the complete collapse of the TW 2.0 Accelerated Delivery roadmap. DCSA faces critical, time-sensitive milestones in the second half of 2026 that rely entirely on the modernized infrastructure from Tasks 1 and 2:

- July 1, 2026: The first wave of MVP 1 (Intelligent Vetting Management) was scheduled to begin to ensure workload distribution and automated data exchange capabilities are delivered by December 2026.
- July 20, 2026: MVP 2 (Investigative Enterprise Portal) requires immediate modernized integration to meet its PVQ Refactor milestone. Immediate action is required to avoid further delays, which can affect national security.

A time-consuming competitive process is not feasible. ICF is uniquely positioned for this bridge action because the Government has already thoroughly evaluated their technical solution and confirmed their ability to perform under the underlying competitive procurement. Initiating a new procurement (solicitation, evaluation, award, and onboarding) would consume the exact time window required to hit the critical July 2026 milestones, thereby guaranteeing mission failure.

Other facts: On 29 February 2024, DCSA awarded HS00212490001, an Other Transaction Authority (OTA) to iWorks Corp. The objective of this OTA was to provide a prototype solution which satisfies the NBIS requirement for an Agile Software Factory prototype designed to sustain, transform, and transition the SWFT, DISS, and DCII applications. This requirement was a follow-on acquisition that continued the services required to integrate NBIS applications and subordinate systems into the NBIS system of systems. This acquisition executed the Memorandum of Agreement (MOA) between the Defense Information Systems Agency (DISA), the Defense Human Resources Activity (DHRA) / Defense Manpower Data Center (DMDC) and the DCSA, which in turn implemented the Deputy Secretary of Defense (DEPSECDEF) memo of January 18, 2019, directing the consolidation of Defense personnel vetting functions and associated contracts at the DCSA.

The MOA specified that existing contracts shall be transitioned from DISA and DMDC to DCSA, and new contracting actions executed. That acquisition carried out the DEPSECDEF direction by executing a new DCSA contract for NBIS services previously performed under a DMDC General Services Administration (GSA) Alliant Task Order (TO), "Personnel Security / Assurance (PSA) Sustainment Support II" and TO 47QFCA23F0018 "National Background Investigation Services (NBIS) Application and Subsystem Services (NASS) Bridge" Issued by The Federal Systems Integration and Management Center (FEDSIM) under Contract# HHSN316201200026W.

The Other Transaction Authority (OTA), 10 U.S.C. § 4022, allows the Department of Defense (DoD) to "carry out prototype projects that are directly relevant to enhancing the mission effectiveness of military personnel and the supporting platforms, systems, components or materials proposed to be carried out by the DoD, or to improvement of platforms, systems, components, or materials in use by the armed forces."

As the prototype phase neared successful completion, DCSA initiated transition planning to migrate the requirement to a long-term, FAR-based steady-state contract

vehicle to foster competitive, lifecycle operations. This planning culminated in the competitive solicitation, which resulted in the selection of ICF.

The current interim sole-source action is required strictly to bridge the gap created by the active protest of that FAR-based award. This interim action is not an extension of the prototype OTA, but rather a bridge to preserve the continuity of the mission-critical Task 1 and Task 2 capabilities established under the OTA and validated during the subsequent competitive source selection.

5. **Best Value Determination:** Prior to award, the Contracting Officer will make a formal determination that the anticipated cost and price to the Government for this interim action are fair and reasonable, despite the urgent operational timeline. This determination will be supported by a multifaceted cost and price analysis, utilizing established historical data and competitive baselines. This analysis will be further reinforced by an evaluation of the proposed labor mix, individual labor category rates, and direct reviews of all proposed material and Other Direct Cost (ODC) assumptions. ICF will be held to the competitive pricing standards previously established, ensuring that the Government secures high-value mission support at a fair and equitable cost.

6. **Market Research:** Extensive market research was already completed via the recent, highly competitive DISS/PVAAMS procurement, which successfully validated market capabilities and resulted in ICF's selection. Conducting supplementary market research or a secondary competition for this immediate, short-term requirement would fatally delay critical Trusted Workforce (TW) 2.0 milestones, whereas ICF is uniquely positioned to commence work without delay.

   Market research for this interim action is directly informed by the exhaustive source selection process recently concluded for the establishment of the Multiple Award Blanket Purchase Agreement (BPA) that this order will be awarded against. That procurement actively tested the market, confirming both strong industry interest and technical capability.

7. **Actions to Overcome or Remove Barriers to Competition:** The agency has not identified any barriers to competition. As discussed above, the agency competed these services; however, due to protest, this bridge contract is required to ensure no lapse in critical services for the federal government. DCSA will continue to compete these services, provided market research reveals a competitive marketplace.

8. **Technical or Requirements Personnel's Certification:**
   I certify that the facts and representations under my cognizance, which are included in this justification, and which form a basis for this justification, are complete and accurate to the best of my knowledge and belief.

X [redacted] Digitally signed by [redacted]
Date: 2026.08.04 11:11:43 -05'00'

Program Official

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

X [redacted] Digitally signed by [redacted]
Date: 2026.08.11 10:02:18 -04'00'

Contracting Officer

Advocate for Competition (>$10M):
Based on the foregoing justification, I hereby concur in/approve the procurement of services as an exception to fair opportunity pursuant to the authority of 41 U.S.C. § 3204 as implemented by GSAR 538.7104-3(b)(l)(i)), subject to the availability of funds, and provided the supplies/services described herein have otherwise been authorized for acquisition.

X [redacted] Digitally signed by [redacted]
Date: 2026.08.11 10:53:42 -04'00'

Procuring Activity Competition Advocate