UNITED STATES MARINE CORPS
MARINE CORPS INSTALLATIONS NATIONAL CAPITAL REGION
MARINE CORPS BASE QUANTICO
3250 CATLIN AVENUE
QUANTICO VIRGINIA 22134 5001

IN REPLY REFER TO:
4200
C-21
M00264-26-JA-005

JUSTIFICATION AND APPROVAL FOR USE OF OTHER THAN FULL AND OPEN COMPETITION

1. Contracting Activity

Marine Corps Installations National Capital Region – Regional Contracting Office (MCINCR-RCO), Quantico, VA 22134.

2. Description of Action Being Approved

The action being approved under this J&A is the award of a sole-source contract to extend the contractor support services provided under task order M67854-21-F-3009 for the Marine Corps University (MCU), College of Distance Education and Training (CDET) Distance Professional Military Education (DPME) program. The purpose of this bridge contract is to extend the services currently being provided for a total of 12 months, beginning on 1 July 2026. The contractor for this effort is Davis Defense Group. Inc., (CAGE 3B0Y3) located at 475 Aquia Towne Center Drive, Suite 401, Stafford, VA 22554.

3. Description of Supplies / Services

The MCU CDET DPME program supports 64,000 students per year via in-person and online courses that are essential to improving individual performance and maintaining leadership continuity in the Marine Corps for generations to come. The DPME program supports Marines in their professional development, which has a direct impact on their future promotion competitiveness and assignments across the Marine Corps.

The scope of this effort is to provide program management, instructional services, subject matter expert /curriculum development services, editorial services, multimedia expertise, instructional technology, administrative services, and student support services in support of the MCU CDET DPME program. This support is to be provided at the CDET Headquarters in Quantico, VA and mainly at the seven (7) regional Campus and office locations:

- MCB Quantico, VA,
- MCB Camp Lejeune, NC,
- MCB Camp Pendleton, CA,
- Marine Corps Air Station (MCAS), Miramar, CA,

- Joint Reserve Base (JRB), Fort Worth, TX,
- MCB Kaneohe Bay, HI, and
- MCB Camp Butler, Okinawa, Japan.

The current contract was awarded competitively to Davis Defense Group, Inc. The fourth and final option period has been exercised and will expire on 30 June 2026. This contract will serve as a bridge contract and will extend services currently being provided for a period of twelve months from 30 June 2026 through 29 June 2027. The total estimated value is [redacted]. O&M, MC funding will be used for this requirement.

4. Statutory Authority Permitting Other Than Full and Open Competition

10 U.S.C. § 3204(a)(1), Only one responsible source and no other supplies or services will satisfy agency requirements.

5. Rationale Justifying Use of Cited Statutory Authority

The findings supporting the selection of the cited statutory authority are as follows:

The Government is currently working towards a competitive follow-on procurement for these services. The original Plan of Action and Milestones (POA&M) had a June 2026 award date. However, there have been delays in the execution of the follow-on competitive procurement that have pushed back the estimated award date to April 2027. These delays have resulted from: (1) requirement changes which necessitated a re-write of the performance work statement (PWS) and change of contract type and structure which caused approximately 4 months of delays; (2) an extended market research period due to a high volume of industry responses to the Request for Information (RFI) posted which had to be assessed to determine the set aside strategy, which caused approximately 2 months of delays; (3) the impact of the 43-day Government shutdown which completely halted work on this effort and built up the workload of stakeholders involved in this procurement, which caused approximately 2 months of delays; and (4) staffing shortages due to positions lost to the Deferred Resignation Program (DRP) on both the requirement development and Contracting office sides, without a decrease in workload, impacting the team's ability to work the follow-on procurement and source selection in a timely manner, causing approximately 2 months of delays. All of these delays contributed to a 10-month delay that the current competitive follow-on procurement is experiencing. These delays have necessitated a bridge contract be put in place to prevent a gap in services between when the current contract ends and when the follow-on competitive contract can be awarded, currently expected to be in April 2027. While award is possible by April 2027, the length of this bridge contract also needs to be tied to the MCU academic year. The MCU CDET's academic cycle for the DPME program is from July to June annually and requires all faculty members, which include contractor support staff, to be readily available for the entirety of the academic year in order to provide uninterrupted instructional support to maintain and meet mission. Transitioning contractors mid-academic year would cause significant disruption to student learning and negatively impact mission-critical Professional Military Education for thousands of Marines. This means that a shorter bridge from July 2026 through April 2027 would not meet CDET's mission. The requested 12-month long bridge contract will provide sufficient time to properly execute source

selection evaluation and completion of all documentation and reviews needed to make a competitive follow-on contract award, while aligning with the CDET's academic year, ending in June 2027.

A short-term competitive bridge contract, valued at approximately [redacted], would require an acquisition timeline of at least 9 months to award. With the current contract expiring on 30 June 2026, it is not feasible to award either a short-term competitive bridge contract on time to avoid a gap in service. Awarding this bridge to the incumbent contractor for the continuation of services under the previously competitively awarded contract is the only way to avoid a gap in these vital services for MCU CDET until the agency can award a competitive follow-on contract.

In addition to the timeline required to award a competitive bridge action valued at approximately [redacted] due to the nature of this action being a short-term bridge contract, it is impractical to award a contract of this magnitude and complexity to a new vendor. There are no known sources other than Davis Defense Group, Inc. who can immediately provide the required services without resulting in unacceptable delays in fulfilling the agency's requirements. This contract provides a high volume of services supporting MCU CDET's DPME program to meet its mission requirements. MCU CDET DPME requires these services that support 64,000 students per year via in-person and online courses at the MCU CDET HQ and seven (7) locations CONUS and OCONUS with [redacted]. Awarding this bridge action to other than the incumbent for the period between the end of the current contract and award of the competitive follow-on procurement would require a transition period to allow a potential new contractor to provide sufficient staff in the required places of performance. Staffing efforts would include hiring and onboarding approximately [redacted], which require onboarding actions (e.g., obtain common access cards, complete system access requests, complete background investigations and security clearance requirements and any other applicable hiring actions) and relocation of employees to overseas locations. Additionally, before contracted staff can serve as faculty members, they require vetting and training, including attending a mandatory week-long MCU-led Faculty Workshop. Contractor staff performing as instructors must participate in this event to be vetted as academic instructors for MCU. The time that it would take for a new contractor's staff to reach the proficiency level of the incumbent contractor's staff in performing the actual tasks is significant. Additionally, the learning curve associated with having a staff of approximately [redacted] supporting the various regional Campus and office locations is significant, given the magnitude of courses this contract provides and the vast spread of locations the contractors support. The current contractor, Davis Defense Group, Inc., has provided the necessary services for more than four years and has the immediate structure in place to support the various regional Campus and office locations. In addition, they possess the requisite knowledge and experience performing these DPME academic support services and are familiar with the distinctive requirements of MCU CDET. This expertise is necessary to be able to provide continued performance in a successful manner which is also crucial to aid in transitioning to the follow-on competitive contract. Awarding to a different contractor for this short term bridge would cause unnecessary delays due to the time it would take to transition, as explained above. Continuity in support is key for MCU CDET to retain these vital services that are provided to support mission-essential tasks within MCU CDET, and continuing services with the current contractor for this bridge period is the most logical way to obtain the continuity of service. This bridge contract is being awarded simply to

continue services with the same contractor only for the time needed to competitively award the follow-on five-year contract and transition to a new vendor aligning with the MCU academic year. Based on the foregoing analysis, this bridge contract must be issued on a sole-source basis to Davis Defense Group, Inc., as they are the only responsible source that will satisfy the agency's requirements.

This Contract directly supports the MCU CDET and is essential to mission accomplishment. The support services provided under this contract enable MCU CDET to respond rapidly, operate independently, and integrate effectively with broader military efforts, reinforcing its critical role in national defense. This requirement directly supports the National Defense Strategy, Training and Education 2030, and the TECOM and Education Command (EDCOM) Campaign Plans. In doing so, it enables TECOM to fulfill its mandate to train and educate Marines at their assigned locations, preserve force readiness, and ensure non-resident education achieves parity with resident programs. A delay or a gap in service will negatively impact MCU CDET's ability to support the 64,000 annual student population, which will prevent Marines [redacted]% of officers and [redacted]% of enlisted) from completing the full academic year and thus not complete their professional military education requirements for grade. This negatively affects their eligibility for promotions and future assignments, which in turn impacts Manpower across the Marine Corps. The inability to develop and promote Marines to the next ranks poses a significant risk to the USMC's mission and could become a national security concern, especially in times of global conflict. The services are critical to MCU CDET's operations and it is crucial that services continue until an award is made on the competitive follow-on effort. There are no feasible alternatives to continuing the contracted support in-house, as organic Marine Corps personnel do not have the necessary training and certifications and are not available in sufficient numbers to meet this requirement. Davis Defense Group, Inc., as the incumbent provider of the highly specialized services required, is deemed the only source that can properly fulfill the Government's requirements without unacceptable delays.

Based on the above findings, awarding this bridge contract to Davis Defense Group, Inc. on a sole-source basis pursuant to 10 U.S.C. §3204(a)(1) and FAR 6.103-1 is in the Government's best interest.

6. Description of Efforts Made to Solicit Offers from as Many Offerors as Possible.

The contracting activity is currently working on the follow-on competitive contract for these services via a Service-Disabled Veteran Owned Small Business (SDVOSB) competitive set-aside. As stated above, there are no known sources who can immediately provide the required services without resulting in unacceptable delays in fulfilling the agency's requirement. The ADC I&L (Contracts) issued a blanket waiver of the requirement at DFARS PGI 206.103-170(d) for bridge contracts on 23 December 2020. This memorandum applies to this action and waives the requirement to issue a request for information or sources sought notice when utilizing the authority at FAR 6.103-1. The Government intends to provide notice of the sole source contract action, approved herein, by publishing a synopsis of the action in accordance with FAR 5.101.

7. Determination of Fair and Reasonable Price

The Contracting Officer determines that the anticipated cost of the services covered by this J&A will be fair and reasonable. The Contracting Officer will rely on several pricing sources, which could include information other than certified cost or pricing data to develop a sound negotiation objective by ensuring that the contractor's proposal is compliant with all applicable cost and pricing regulatory standards, industry best practices, and company disclosure statements.

8. Actions Taken to Remove Barriers to Future competition

The Government is in the process of conducting a 100% SDVOSB set aside competitive acquisition for the follow-on requirement. This bridge contract will allow sufficient time for the re-competition and award of a new contract in support of MCU CDET.

CERTIFICATIONS AND APPROVAL

TECHNICAL/REQUIREMENTS CERTIFICATION

I certify that the facts and representations under my cognizance which are included in this Justification and its supporting acquisition planning documents, except as noted herein are complete and accurate to the best of my knowledge and belief.

Technical/Requirements Cognizance:

[redacted]

[redacted]

[redacted]

CONTRACTING OFFICER CERTIFICATION

[redacted]

COMPETITION ADVOCATE APPROVAL

Upon the basis of the above justification, I hereby approve, as the Competition Advocate for MCINCR-RCO, the solicitation of the proposed procurement described herein using other than full and open competition, pursuant to the authority of 10 U.S.C. 3204(a)(1).

[redacted]

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- MCINCR-RCO Personnel
- LB Personnel
- Procurement Team Personnel (to include but not limited to: Legal, Customers/Requirements Owners, Source Selection Personnel, Small Business Representatives)