JUSTIFICATION
FOR AN EXCEPTION TO FAIR OPPORTUNITY

1. Contracting Activity: Department of Veterans Affairs (VA)
Office of Procurement, Acquisition, and Logistics
Technology Acquisition Center
23 Christopher Way
Eatontown, NJ 07724

2. Description of Action: The proposed sole source action is for a modification to the Firm-Fixed Price (FFP) Task Order (TO) 36C10B26N10260047, Enterprise Messaging, Collaboration, Authentication and Office (EMCAO) 365 Services Support 24x7, issued under the Transformation Twenty-One Total Technology Next Generation (T4NG) Contract VA118-16-D-1026 with ProSphere Tek, Inc. (ProSphere), 10632 Little Patuxent Parkway, Suite 200, Columbia, MD 21044. The purpose of this modification is to extend the period of performance (PoP) of the EMCAO TO Option Period One for - two months. The current option period is scheduled to end on June 10, 2026. This extension will serve as a bridge of support for critical services due to a protest filed against the competitive follow-on award TO, EMCAO 365 Services Support, awarded on March 5, 2026, which is currently under a mandatory stay pending the results of the protest.

3. Description of the Supplies or Services: On February 10, 2026, an EMCAO bridge TO was awarded to ProSphere on a sole-source basis on the T4NG contract vehicle with a total value of $2,294,617.80 to prevent a lapse in service until the re-compete effort could be awarded. The current extension will provide administrative and operational support for the VA enterprise messaging, collaboration, and authentication services, across all current and future Microsoft 365 (M365) applications. This includes Microsoft Outlook, Teams, SharePoint, OneDrive, and Azure Rights Management Services (RMS), all managed under VA's M365 tenant. The Contractor shall also support Active Directory and related technologies such as Configuration Manager, Intune, and Public Key Infrastructure. These services are critical to VA's operations, as M365 is designated a C100/Bedrock system, which is classified as mission-critical and foundational to VA's ability to deliver services to Veterans. The TO ensures 24x7x365 support for help desk operations, project management, onboarding/offboarding, eDiscovery, endpoint engineering, and inter-agency Business-to-Business (B2B) integration. Requests for support are submitted through ServiceNow or email, and the Contractor is responsible for maintaining standard operating procedures, delivering regular reports, and ensuring compliance with VA security and accessibility standards. VA provides all necessary software, licenses, and government-furnished equipment, while the Contractor supplies accessories and technical expertise to maintain continuity and performance of these essential systems.

The PoP for this proposed action shall be June 11, 2026 through August 10, 2026. The total estimated value of this proposed action is [redacted]

4. Statutory Authority: The statutory authority permitting an exception to fair opportunity is Section 41 U.S.C. 4106(c)(1) as implemented by the Revolutionary Federal Acquisition Regulation (FAR) Overhaul (RFO) VA Deviation 16.507-6(b)(2), entitled "Only one awardee is capable of providing the supplies or services required at the level of quality required because the supplies or services ordered are unique or highly specialized."

5. Rationale Supporting Use of Authority Cited Above: The proposed source for this action is ProSphere, 10632 Little Patuxent Parkway, Suite 200, Columbia, MD 21044. ProSphere was awarded the EMCAO bridge TO on February 10, 2026, on a sole-source basis on the T4NG contract vehicle, and the PoP ends on June 10, 2026. A new recompete TO, EMCAO 365 Services Support, was awarded to replace the EMCAO contract on March 5, 2026; however, the award was subsequently protested, and a mandatory stay of award was issued as a result of the protest. While the protest is under review, performance under the protested award cannot commence. To avoid a lapse in critical EMCAO 365 support services, it is necessary to extend the current EMCAO TO to ensure continuity services until the protest is resolved and the new TO can be executed.

For these reasons, EMCAO requires continued technical support currently being provided by ProSphere. A lapse in service will result in the loss of 24x7x365 support for help desk operations that handle thousands of monthly tickets that have been escalated to our group, for end users across the entire VA, for essential collaboration services such as Microsoft Exchange, OneDrive, RMS, SharePoint, and Teams. A few examples of issues that get escalated are, users being unable to send or receive email, mailboxes reaching capacity, shared mailbox requests, OneDrive sync issues, missing OneDrive files, RMS messages that are unable to be encrypted or decrypted, SharePoint sites needing to be generated, configured, and permissioned accordingly, missing Teams channels, etc. eDiscovery (electronic discovery) is the process of identifying, preserving, collecting, reviewing, and producing electronically stored information for use in legal matters such as lawsuits, investigations, and regulatory proceedings. It focuses on digital data such as email messages, documents, chat messages, databases, and social media that may serve as evidence and must be handled according to legal and procedural rules. In VA, eDiscovery cases increase by the day. A lapse in service leaves the eDiscovery team further understaffed and will cause delays in the processing of these cases – case delays can result in court-imposed fines being leveraged against VA for missing court deadlines. B2B provides secure, structured communication and data exchange between the VA and external entities such as the Department of War, Electronic Health Record systems, and other federal agencies. By enabling real-time collaboration with external partners, B2B tools help streamline the processing of disability claims, pension applications, and other benefits. A lapse in service will cause B2B efforts to come to a halt, thereby negatively impacting services to Veterans. The absence of Contractor support would also impact project management functions, onboarding / offboarding processes, and endpoint engineering.

ProSphere is currently providing and meeting the administrative and operational support requirements described in Section 3 above for EMCAO. Without the approved

extension, VA's ability to maintain secure, efficient, and uninterrupted IT services for its healthcare and administrative operations would be compromised, potentially affecting service delivery to Veterans and internal mission-critical functions. The recompete effort TO, 36C10B26N10350005, is in a stay and cannot move forward until the protest is resolved. The protest is set to resolve in early July 2026 and to account for smooth transition to a new contractor the period of performance is being extended to August 10, 2026.

6. Efforts to Obtain Competition: Market Research was conducted, details of which are in Section 8 of this justification. In accordance with FAR Overhaul RFO VA Deviation 5.301 and 16.507-6(f), the award notice for this action will be synopsized on the Contracting Opportunities website, SAM.gov, and the justification will be made publicly available within 14 days of award.

7. Actions to Increase Competition: No barriers to future competition are anticipated. The requirements under this effort were competed under a competitive acquisition and a TO awarded. The performance of the award is stayed pending the results of a protest. It is anticipated that all future actions will also be competed.

8. Market Research: This requirement is leveraging market research conducted in November 2025 as part of the competitive procurement for the follow-on TO that is currently under protest, which includes support for the same services. On November 12, 2025, the Government posted a Request for Information (RFI) on the Contract opportunities site via SAM.gov, requesting technical information necessary to determine capable vendors of providing the required services. In addition, prime contractors under T4NG were also notified of the RFI on SAM.gov. On November 18, 2025, responses were received from [redacted] vendors to include [redacted] SDVOSBs. All of the capability statements were reviewed and [redacted] of the [redacted] were determined to be capable of performing the effort.

In November 2025, the Government technical experts reviewed the above-mentioned vendors and found that only ProSphere would be able to provide the EMCAO support services on day one. While there were [redacted] vendors deemed capable of meeting the requirements under future conditions, none, aside from ProSphere are positioned to deliver uninterrupted EMCAO support services for these critically needed applications in order to ensure there is a no gap in service until the protest is resolved.

9. Other Facts: None

10. Technical/Requirements Certification: I certify that the supporting data under my cognizance, which are included in this justification, are accurate and complete to the best of my knowledge and belief.

[redacted]

11. Fair and Reasonable Cost Determination: I hereby determine that the anticipated price to the Government for this contract action will be fair and reasonable based on Independent Government Cost Estimate and price analysis.

[redacted]

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

[redacted]

Approval

In my role as procuring activity Advocate for Competition, based on the foregoing justification, I hereby approve the modification of Enterprise Messaging, Collaboration and Authentication and Office 365 Service Support 24x7 on an other than fair opportunity basis pursuant to the authority cited in Section 4 above, subject to availability of funds, and provided that the property and services herein described have otherwise been authorized for acquisition.

[redacted]