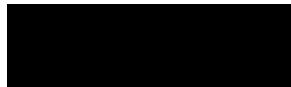


United States Special Operations Command (USSOCOM)



Justification and Approval (J&A)



Justification for Other Than Full and Open Competition (J&A)

Authority: (10 U.S.C. 3204(a)(1), as implemented by RFO 6.103-1)

Project/Program Name: Joint Human Dimension Integration Training Program

Component/PEO/Other: 95th Civil Affairs Brigade, Special Operations (Airborne) (95th CA BDE (SO) (A)), Fort Bragg, NC

J&A Basic Value: Type J&A: (Individual ☒ or Class ☐)

(1) Identification of the agency and the contracting activity: (RFO 6.104-1(a)(1))

95th Civil Affairs Brigade, Special Operations (Airborne) (95th CA BDE (SO) (A)), a subordinate command of the 1st Special Forces Command (Airborne) (1st SFC (A))

The contracting activity responsible for this action is:

US Army Special Operations Command (USASOC) Headquarters (HQ) Contracting Office, E. 2929 Desert Storm Dr, Fort Bragg, NC 28310

(2) Nature and/or description of the action being approved: (RFO 6.104-1(a)(2)) Bridge Action (Yes ☐ or No ☒)

Description of Action: The U.S. Army Special Operations Command (USASOC) requires the acquisition of specialized instructional services, scenario development, and curriculum delivery for the Joint Human Domain Integration (JHDI) Training Program in support of the 95th Civil Affairs Brigade, Special Operations (Airborne) (95th CA BDE (SO) (A)). This action will result in the award of a new, firm-fixed-price (FFP) Blanket Purchase Agreement (BPA) to provide critical pre-deployment and collective unit training, including the Basics of Applied Fundamentals to Open-Source Research (BAF-OSR) and the Joint Network Design Course (J-NDC).

(3) A description of the supplies or services required to meet the agency's needs (including the estimated value): (RFO 6.104-1(a)(3))

Requirement Overview: The Government requires specialized, contractor-led instructional services, curriculum maintenance, and scenario development for the Joint Human Domain Integration (JHDI) Training Program. These services are critical for the operational readiness and pre-deployment certification of personnel from the 95th Civil Affairs Brigade, Special Operations (Airborne) (95th CA BDE (SO) (A)) and other USASOC units. The contractor shall provide all personnel, materials, and supervision necessary to deliver the full suite of courses identified in the Performance Work Statement (PWS), including but not limited to:

- Joint Network Analysis and Targeting (JNAT) - Leaders Course

- Joint Network Design Course (J-NDC)
- Joint Critical Infrastructure Analysis and Reporting (JCIA/JCIR)
- Basics to Applied Fundamentals to Open-Source Research (BAF-OSR)
- Culture and Language Support to Exercises

Period of Performance [REDACTED] This action will establish a single-award Blanket Purchase Agreement (BPA). Due to the total estimated value, this BPA will be established in accordance with FAR Part 15 procedures, providing a streamlined ordering process for Firm-Fixed-Price (FFP) calls. The Period of Performance will consist of five (5) one-year ordering periods, plus a 6-month Option to Extend Services IAW RFO 52.217-8

(4) An identification of the statutory authority: (RFO 6.104-1(a)(4))

☒ 10 U.S.C. 3204(a)(1), as implemented by the Revolutionary FAR Overhaul (RFO) 6.302-1, Only one responsible source and no other supplies or services will satisfy agency requirements.

(5) A demonstration that the proposed contractor's unique qualifications or the nature of the acquisition requires using the authority cited: (RFO 6.104-1(a)(5))

1. Mandatory Pre-Award Curriculum Validation: The Joint Human Domain Integration (JHDI) Training Program requires a contractor to deliver a Basics of Applied Fundamentals to Open-Source Research (BAF-OSR) course that is compliant with USSOCOM and 1st SFC policies. Upon detailed coordination with the 1st SFC G9, the certifying authority for this training, the requirement was clarified: to be considered for award, a vendor must possess a pre-existing, formal validation memorandum confirming their curriculum meets these standards. This is not a post-award deliverable but a mandatory prerequisite for award. The PWS has been updated to reflect this explicit requirement. This validation is critical because the resulting individual certification is what authorizes personnel to access and utilize specific, secure Publicly Available Information (PAI) reporting systems.

2. Sole-Source Demonstration via Market Research: Market research confirms that Obsidian Solutions Group, LLC (OSG) is the only source capable of meeting the Government's requirements. This was determined through a multi-phased process involving a SAM.gov Sources Sought notice, direct vendor engagement, and internal Government verification.

Following the initial notice, the Contracting Officer directly engaged with interested vendors to clarify the mandatory requirement for a pre-existing curriculum validation. In response, OSG provided documentation of an exclusive teaming agreement with The Hetherington Group (a certified WOSB). The Government subsequently coordinated with the 1st SFC G9 (certifying authority), who verified via secure-network records that The Hetherington Group possesses the active, signed validation memorandum for the required BAF-OSR course. As part of this verification process, the Government confirmed that The Hetherington Group is exclusively partnered with OSG for this DoD requirement and is not available to act as a prime contractor or partner with other offerors. The other interested vendor, Valens Global, confirmed they do not possess this mandatory prerequisite.

Therefore, this comprehensive market research confirms that access to the only validated curriculum is exclusively through OSG, making them the only responsible source that can meet the Government's requirements without causing unacceptable mission-critical delays.

3. Unacceptable Latency & Duplication of Cost: To have another vendor, such as Valens Global, develop and certify a new curriculum would require a formal 1st SFC G9 audit process. This would involve a significant investment of Government time and resources from SME and technical experts and would result in an unacceptable delay of 6-12 months. The 95th CA BDE has an immediate and urgent need for this training to meet pre-deployment certification timelines. Awaiting the validation of a new curriculum would cause serious injury to the Government's mission.

(6) A description of efforts made to ensure that offers are solicited from as many potential sources as possible, including whether a notice was or will be publicized as required by Part 5 and, if not, which exception under Part 5 applied: (RFO 6.104-1(a)(6))

In accordance with RFO Part 10 and Part 5, the Government published a combined Sources Sought / Request for Information (RFI) / Notice of Intent to Sole Source on SAM.gov under Notice ID H92239-26-R-E010.

This notice was posted on May 22, 2026, and invited all interested vendors to respond to assist in the final market research determination. The market research was conducted using a deliberate, two-phased approach. Following the review of initial responses, the Contracting Officer engaged directly via email with all responding vendors. This follow-on communication provided the clarified and complete requirement, including the mandatory pre-requisite for a pre-existing, command-signed validation memorandum for the BAF-OSR course.

This two-phased approach—a broad public notice followed by direct engagement and clarification with interested parties—ensured that offers were solicited from as many potential sources as practicable. As detailed in Section 8, this process confirmed that only one source possessed the unique and mandatory qualifications required for award.

(7) A determination by the contracting officer that the anticipated cost to the Government will be fair and reasonable: (RFO 6.104-1(a)(7))

Fair and Reasonable Determination Strategy: I hereby determine that the anticipated cost to the Government for this contract action will be fair and reasonable. The Contracting Officer will establish price reasonableness in accordance with RFO Part 12 and Part 15, as this is an acquisition for commercial services exceeding the threshold for simplified procedures.

Price Analysis Techniques: Because this action will result in a sole-source award, the Contracting Officer will conduct a comprehensive price analysis to ensure a fair and reasonable price, utilizing one or more of the following techniques:

1. Comparison to the Independent Government Cost Estimate (IGCE): Comparison of the proposed prices to the detailed IGCE developed by the requiring activity.
2. Comparison with Existing GSA Schedule Contracts: Comparison of the proposed labor rates to the rates established for similar labor categories on the awardee's existing General Services Administration (GSA) Federal Supply Schedule (FSS) contracts.
3. Historical Comparison: Comparison of the proposed prices to historical prices previously paid by the Government for similar specialized instructional services.

CONTRACTING OFFICER SIGNATURE IN SECTION 12 BELOW ALSO SERVES AS THE PRICE FAIR AND REASONABLENESS DETERMINATION IN THIS SECTION.

(8) The market research conducted (see part 10) and the results or a statement of the reason market research was not conducted: (RFO 6.104-1(a)(8))

Market Research Methodology: In accordance with RFO Part 10, the Government conducted multi-phased market research from May to July 2026 to identify all potential sources capable of meeting the requirements under NAICS code 611699. The specific methodology was as follows:

1. Public Notice: A combined Sources Sought / RFI / Notice of Intent to Sole Source was published on SAM.gov (Notice ID: H92239-26-R-E010).
2. Follow-on Industry Engagement: Upon review of the initial responses, the Contracting Officer engaged directly via email with all interested vendors (Obsidian Solutions Group and Valens Global) to clarify the complete requirement. This included explicitly stating the mandatory pre-requisite for a pre-existing, command-signed validation memorandum for the BAF-OSR course.
3. Technical Verification: The Contracting Officer coordinated directly with the 1st Special Forces Command (1SFC) G9, the authoritative certifying body. The G9 PAI Program Manager verified via secure-network records which commercial entities, if any, held the required active validation memorandum.
4. Internal Capability Analysis: The Government deconflicted the requirement with the [REDACTED] to confirm that internal Government courses [REDACTED] could not meet the 95th CA BDE's immediate training needs.

Results of Market Research: This multi-phased research conclusively determined that only one responsible source can satisfy the agency's requirements.

- Obsidian Solutions Group, LLC (OSG): Responded to the direct engagement by providing an exclusive teaming agreement with The Hetherington Group. The Government's technical verification with the 1st SFC G9 confirmed that The Hetherington Group possesses the active, signed validation memorandum required to teach the BAF-OSR course.
- Other Interested Sources (Valens Global): When engaged directly by the Contracting Officer, Valens Global confirmed they do not possess the mandatory pre-existing validation memorandum. While they stated they could develop a compliant course, this would require a 6-12 month validation process, which is an unacceptable delay.
- Internal Government Capabilities: [REDACTED]

Therefore, market research demonstrates that competition is not feasible. OSG, through its exclusive partnership with the only command-validated curriculum holder, is the only source that can meet the Government's mission-critical training schedule.

(9) Any other facts supporting use other than full and open competition, such as: (i) When 6.103-1 is cited for follow-on acquisitions as described in 6.103-1(c)(2), an estimate of the cost to the Government that would be duplicated and how the estimate was derived: (RFO 6.104-1(a)(9))

In addition to the vendor possessing the sole mandatory validation, the following facts support awarding this contract to Obsidian Solutions Group, LLC (OSG) on a sole-source basis:

1. Proprietary Curriculum and Intellectual Property: The required BAF-OSR curriculum, validated by the 1st SFC G9, is the proprietary intellectual property of OSG's exclusive subcontractor, The Hetherington Group. This validated courseware was developed at private expense. While other vendors offer training in similar subjects, no other source has the data rights or authorization to deliver this specific, command-recognized curriculum. Awarding to another source would require the Government to fund the development and validation of a new, duplicative course.
2. Risk of Inconsistent Training and Mission Failure: The PWS requires a contractor to provide a full, integrated suite of courses. Market research confirmed that OSG is capable of delivering all required courses, while other interested vendors, such as Valens Global, did not demonstrate capability across the full spectrum of requirements. Awarding separate contracts would introduce significant risk and administrative burden. Only a single, integrated provider can ensure a standardized, cohesive training pipeline for deploying personnel.
3. Unacceptable Duplication of Cost and Time: To have another vendor develop a new, equivalent curriculum for the BAF-OSR course would require a significant

investment of Government time and resources. The process would involve a formal audit by the 1st SFC G9, attendance and validation of the course by Government SMEs, and a lengthy administrative approval cycle. The unacceptable delay of 6-12 months would prevent the 95th CA BDE from meeting critical pre-deployment training deadlines, thereby causing serious injury to the Government's mission.

(10) A listing of the sources, if any, that expressed an interest in the acquisition in writing: (RFO 6.104-1(a)(10))

The following sources responded to the Sources Sought / RFI notice (H92239-26-R-E010) or otherwise expressed interest in this acquisition in writing:

1. Obsidian Solutions Group, LLC
2. Valens Global

(11) A statement of the actions, if any, the agency may take to remove or overcome any barriers to competition before any subsequent acquisition for the supplies or services required: (RFO 6.104-1(a)(11))

Analysis of Barriers to Competition: The primary barrier to competition is not a lack of interested vendors, but the mandatory requirement that the contractor's curriculum possess a pre-existing, formal validation memorandum from the 1st Special Forces Command (1SFC) G9. Due to the direct link between this training and sensitive SOF activities, the governing policies and the official roster of pre-validated courses are maintained on secure government networks. Currently, only one commercial entity, The Hetherington Group (the proposed subcontractor to Obsidian Solutions Group), has completed this formal audit and validation process.

However, the Government does not restrict this certification to a single vendor and is actively working to develop additional sources. The Contracting Officer has facilitated direct engagement between another interested vendor, Valens Global, and the 1st SFC G9 to initiate the formal curriculum audit and validation process. While this 6-12 month process cannot be completed in time to meet the critical pre-deployment deadlines of this current requirement, this ongoing effort demonstrates the Government's commitment to fostering a competitive environment for future acquisitions.

Actions to Increase Future Competition: To overcome this barrier for future acquisitions, the Government will take the following actions:

1. Facilitate Vendor Engagement with the Certifying Authority: During the market research for the current action, the Contracting Officer actively coordinated between an interested vendor (Valens Global) and the 1st SFC G9 to explore the possibility of validating their curriculum. For future requirements, the Government will continue to act as a facilitator by providing the official points of contact at the 1st SFC G9 to any interested vendors, enabling them to initiate the formal curriculum audit process.
2. Publicize Future Requirements: For any subsequent acquisitions, the Government will issue a Sources Sought Notice on SAM.gov well in advance of the contract expiration date. This notice will explicitly state the mandatory validation

requirement and encourage any newly validated vendors to submit their qualifications.

3. Ongoing Market Monitoring: The Contracting Officer and the COR will continue to conduct market research to identify any additional vendors who successfully complete the 1SFC G9 validation process, with the goal of fostering a competitive environment for the follow-on contract.

NOTICE 1

Prior to approval, J&As will be screened to identify proprietary data and information exempted from disclosure by 5 U.S.C. 552, Freedom of Information Act, so that the final J&A may be prepared for required posting to SAM.gov Contract Opportunities. J&As shall be posted within 14 days unless 10 U.S.C. 3204(a)(2), Unusual and Compelling Urgency is cited. In that particular case the J&A will be posted within 30 days. Information selected for removal will be highlighted in yellow much like this statement so that signature authorities will know what information will be removed after approval, before posting.



