

**Limited Sources Justification**  
**FAR 8.405-6**

**1. Identification of the agency and the contracting activity.**

This requirement is an assisted acquisition conducted by the General Services Administration (GSA) for procurement of Travel Management Center (TMC) services in support of the Department of Defense (DoD) Defense Travel Management Office.

*Contracting Activity:* General Services Administration (GSA)  
Federal Acquisition Service (FAS)  
Travel Acquisition Support Branch (QMACB)  
1800 F Street, NW, 3<sup>rd</sup> Floor, Hub 3400  
Washington, D.C. 20405

**2. Nature and/or description of the action being approved.**

The purpose of this limited sources justification is to support the award of a sole source bridge task order to CW Government Travel, Inc. for continued support in providing official TMC services for U.S. Army CONUS Defense Travel Area 4 (DTA 4). The Department of Human Health Services (HHS) Program Support Center (PSC) originally awarded contract HHSP233201700016I on March 17, 2017, to CW Government Travel, Inc. for a period of performance from April 1, 2017 – March 31, 2020, to provide all personnel, equipment, material, supervision and other items or services necessary to perform TMC services for DTA 4 U.S. Army CONUS.

On June 14, 2019, HHS/PSC officially notified the DTMO by memorandum and email that it would be terminating its assisted acquisition program for non-HHS agencies. As a result, effective October 31, 2019, HHS PSC executed its termination of contract HHSP233201700016I. On November 1, 2019, the General Services Administration (GSA) executed a bridge task order that continued services to the Army CONUS DTA 4, with a base period from November 1, 2019 to April 30, 2020. On April 28, 2020, the GSA Travel Acquisition Support Branch modified the task order to exercise the option to extend services to expire on September 15, 2020, to expire on October 29, 2020, under the authority of FAR 52.217-8; Option to Extend Services. Subsequently on October 29, 2020, the GSA modified the task order once more exercising the option to extend services to expire on January 29, 2021. On January 29, 2021, the GSA awarded as a sole source bridge contract to CW Government Travel, Inc. to ensure a continuation of support services between old and new contract award. The sole source contract for TMC services under DTA-4 was awarded on January 30, 2021, to expire on 8 March 2021. On March 8, 2021, GSA Travel Acquisition Support Branch modified the task order to exercise the option to extend services to expire on June 30, 2021. On June 30, 2021, GSA further extended services to expire on July 13, 2021. On July 13, 2021, GSA further extended the task order to expire on September 8, 2021, under the authority of FAR 52.217-8; Option to Extend Services.

The current limited sole source contracting action is pursuing a waiver from placing an order on a competitive basis pursuant to FAR 8.405-6(a)(1)(i)(A) which states that an urgent and compelling need exists and following the procedures would result in unacceptable delays. There is no alternative source that can meet the need for immediate uninterrupted travel services and mission readiness.

**3. A complete description of the supplies and/or services required to meet the agency's needs (including an estimated value).**

The required travel management company services are highly specialized and require familiarity with specific travel regulations and laws, including, the Joint Travel Regulations (JTR), the Defense Travel Regulation (DTR), and local Business Rules developed by each site, as well as interfacing with DoD's travel management system for end-to-end travel. Therefore, immediately during contract implementation, the TMC must have detailed knowledge of travel regulations and business rules to ensure traveler reservations are accurate, timely, and IAW with numerous policies and regulations. This requirement does not lend itself to a quick transition for a new contractor. The transition period including implementation for a new contractor is 60 days for CONUS and 90 days for OCONUS locations and with a contract end date of September 8, 2021, it does not allow sufficient time for the required implementation period.

In addition, DoD travelers often use a centrally billed account (CBA) to pay for travel. The Contractor provides assistance in reconciling these accounts monthly. The procedures for reconciling vary by service and also require knowledge of the procedures in place by the Defense Finance and Accounting Service (DFAS). This is a unique requirement to DoD that is not part of the travel requirements for the rest of the Federal Government. DoD travelers are mandated to use the Defense Travel System (DTS) to book all Temporary Duty (TDY) travel, which also requires familiarity by the Contractor. Further, the Contractor must be prepared to ramp up and support DoD's requirements immediately upon Government notification to support surge requirements. Surge support is somewhat specific to DoD and responds to contingencies including, but not limited to, national emergencies, accident investigations, aircraft recovery teams, evacuations, rescue operations, EXODUS travel, civil disturbances, disasters, military peacetime and wartime contingency operations, exercises, personal emergencies, holiday travel and mass casualties (human remains). The current incumbent contractor, CW Government Travel has provided satisfactory support in this area with immediate response and the ability to continue consistent services to all activities under the contract. This further validates that they have the resources needed to maintain continuity of services to both the event at hand and normal day-to-day- operations at all sites on contracts.

It is imperative that these TMC services be continued with the incumbent contractor. Awarding to any source other than the incumbent contractor will severely jeopardize the continued provision of DoD's highly specialized, mission-critical services. At this time, acquiring these services through award to any other contractors would result in unacceptable delays in fulfilling the agency's requirements. The incumbent has successfully provided these services to date and any lapse of travel services will cause serious disruption to DoD's ability to support its travel requirements. To ensure that TMC services for the U.S. Army CONUS locations are uninterrupted, these services must be obtained from the incumbent contractor until such time as the re-compete utilizing full and open competition is completed. The incumbent contractor has successfully provided these services to date and is the only vendor that can meet the requirement without significant disruption and delays to DoD travel needs.

The requirement exceeds the simplified acquisition threshold and the estimated value is \$ [REDACTED]. The period of performance for this sole source bridge effort will be from September 9, 2021 – March 8, 2022, with two (2), two-month option periods.

**4. The authority and supporting rationale (see FAR 8.405-6 (a)(1)(i)(A) - An urgent and compelling need exists, and following the procedures would result in unacceptable delays.**

Due to the circumstances noted above, it is imperative that the TMC services are continued with the incumbent contractor. The contractor is qualified to provide immediate TMC support services; therefore, ensuring uninterrupted travel services necessary to meet the needs of the U.S. Army CONUS requirements. The incumbent has the required skilled staff with detailed knowledge of the customer's mission, JTR, DTR, and other travel related policies; established DTS Passenger Name Record (PNR) validation; established centrally billed accounts and reconciliation processes specific to the customer; and customer centric Global Distribution System (GDS) agreements and profiles for CONUS which require 60 days (CONUS) for implementation. The established profiles afford the incumbent contractor to support each individual customer's needs based on travel preferences and contains business rule requirements unique to U.S. Army CONUS DTA 4. The incumbent's unique qualifications and previously established business processes, allows for immediate continuity of services and continued mission capability, and avoids a gap in mission critical services that could impact National Security.

The potential loss or disruption of these services and required time for transition to a new contractor can cause significant harm; thereby severely hampering DoD's ability to travel in order to successfully meet its travel requirements which may directly impact National Security.

The Government awarded a competitive task order on December 30, 2020, for the services required under this effort. As a result of the ruling by the U.S. Court of Federal Claims on a bid protest of that award, this effort is required to maintain continuity of services and provide official travel management services for the U.S. Army while the Government continues efforts to re-compete this requirement.

Therefore, in accordance with **FAR 8.405.6 (a)(1)(i)(A)**, an urgent and compelling need exists, and delay may result in unacceptable and sequential delays for DoD travelers.

**5. A determination by the ordering activity- Contracting Officer- that the order represents the best value consistent with FAR 8.404(d).**

The CO has determined that the expected outcome of this acquisition, in the Government's estimation, provides the greatest overall benefit in response to the requirement and therefore the best value to the Government consistent with FAR 8.404(d), based on all factors considered above.

IAW FAR 8.404 (d), GSA has already determined that prices are fair and reasonable. In addition, the Contracting Officer will seek additional discounts for this contract action.

**6. A description of the market research conducted among schedule holders, and the results of the research, or a statement why market research was not conducted.**

CW Government Travel Inc. is not the only company capable of providing Travel Management Services under GSA Multiple Award Schedule (MAS), Travel-Travel Agent and Misc. Services Category 561510. However, our market research confirms that they are the only source capable of providing continued provision of the entire scope of highly specialized services within the condensed time frames in order to ensure mission-critical quality levels are achieved. GSA has also conducted

Requests for Information (RFI) for similar services and received very limited feedback from industry, during the RFI process. Based upon the market research results, it is our determination that no other vendor would be able to start-up and perform the services required by the contract start date of September 9, 2021, without grossly impacting and hampering the U.S. Army CONUS travel services.

**7. Any other facts supporting the limited source justification.**

The cost of losing the incumbent contractor to provide the services at the current time would be detrimental to U.S. Army CONUS DTA 4 meeting its mission requirements. In addition, these services are in the preliminary process of a full and open competition, and this short-term bridge task order will provide the necessary continuity of services necessary until the full and open re-competition is officially completed. This is a viable option which will allow DoD to continue its mission while the re-procurement is ongoing.

**8. A statement of the actions, if any, the agency may take to remove or overcome any barriers that led to the restricted consideration before any subsequent acquisition for the supplies or services is made.**

On behalf of DTMO, GSA is re-competing these highly critical services utilizing full and open competition procedures under the GSA Multiple Award Schedule (MAS) Program, Travel Category, Special Item Number (SIN) 561510 Travel Agent Services. However, the contract has not been awarded. The planned period of performance for the new task order will be five (5) years. Industry will be provided a fair opportunity to compete for the award of the required TMC services and GSA will be moving forward with the award of this procurement.

**9. Certifications and Approvals**

**Requisitioner: (*Contractor Employee or Federal Employee*)**

I hereby certify and accept the responsibility that any and all supporting data provided above or used to justify the above requested limited source procurement (e.g., verifying the Government's minimum needs, schedule requirements, and/or other rationale for other than full and open competition) is accurate and complete to the best of my personal knowledge and belief.

\_\_\_\_\_  
Signature Date

**Contracting Officer:**

I certify and approve that the information contained in this Limited Source Justification is accurate and complete to the best of my knowledge and belief.

\_\_\_\_\_  
Signature Date

**Competition Advocate:**

Upon the basis of the following justification, I, hereby approve the use of other than full and open competition of the proposed contractual action pursuant to the authority of 41 U.S.C. 2304).

[REDACTED]

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Signature

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Date