

**DEPARTMENT OF THE TREASURY
SF 1014 - JUSTIFICATION FOR AN EXCEPTION
TO FAIR OPPORTUNITY**

ACQUISITION TITLE: “Firewall Security Management Tool - Tuffin Support”

1. Identification of the requiring activity and the contracting activity:

The requiring activity is the Internal Revenue Service (IRS) / Office of the Chief Procurement Officer (OCPO), Information Technology Operation Division, Enterprise Operations Branch (EOps).

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

The purpose of this JEFO is to obtain approval to award a Firm Fixed Price to procure approval for brand name acquisition, purchase, and update of commercially available proprietary. This acquisition will provide an enterprise-grade solution for managing and automating network security policies across firewalls, routers, cloud platforms, and distributed network architectures. Competition will be limited to authorized resellers of brand name specific items via NASA SEWP on a Lowest Price Technically Acceptable (LPTA) basis.

Tufin Enterprise software is a network security policy management platform used to automate, manage, and monitor network security policies and firewall configurations across complex IT environments. It helps organizations improve security, maintain compliance, reduce configuration risk, and automate network access changes. This product will replace the existing FireMon Security Policy Management (SPM) platform currently in use within the agency's network security environment.

The Tufin Enterprise Suite will deliver enhanced capabilities in security policy automation, change tracking, configuration compliance, network mapping and visualization, segmentation governance, and audit support. This includes full integration with the agency's ServiceNow IT Service Management (ITSM) platform to support standardized, automated, and auditable change workflows. This procurement will support ongoing modernization efforts by enabling automated risk assessment, rule lifecycle management, network path analysis, and continuous compliance across hybrid environments.

This acquisition is necessary to modernize and improve the agency's security policy management processes, reduce operational risk, enhance visibility across complex networks, and align with Zero Trust, federal cybersecurity, and audit-readiness requirements.

2.b Name of the vendor. *TBD*

2.c Requisition No.: 5000222195

2.d Bridge contract: ☐ Yes ☒ No

2.e Brand name: ☒ Yes ☐ No

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3.a A description of the supplies or services required to meet the agency's needs:

This is a bona fide FY2026 requirement to procure Security Policy Management software that provides centralized management, automation, and visibility across the IRS enterprise network security infrastructure.

The required solution must provide capabilities including:

- Security policy management and lifecycle administration.
- Change tracking and automated policy analysis.
- Security policy optimization and rule cleanup.
- Device configuration compliance monitoring and audit reporting.
- Network segmentation analysis and validation.
- Network topology visualization and path analysis to support troubleshooting and impact assessments.
- Integration with IT Service Management (ITSM) tools to support automated change management workflows.
- Automation capabilities for proactive risk assessment, change request verification, change design validation, path identification, and target device selection.
- Enterprise reporting and audit capabilities to support operational, security, and regulatory compliance requirements.

These capabilities are required to improve the efficiency, accuracy, and security of firewall policy administration, strengthen compliance with IRS cybersecurity requirements, reduce operational risk associated with manual processes, and support enterprise-wide network security operations.

As discussed in Section 4b, market research determined that Tufin Enterprise Suite is the only solution capable of meeting all of the IRS's technical, operational, integration, and interoperability requirements without introducing unacceptable mission or operational risk.

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Base Period				
OEM Part	CI	HW/SW	Description	QTY
Number				
TF-T1220	3172A/ 31CO	HW	T-1220 Appliance with 1-Year Support and Warranty	3
TF-T820	3172A/ 31CO	HW	T-820 Appliance with 1-Year Support and Warranty	1
TS-ENTPRS-FW-UNIT	3156A	SW License	Tufin Enterprise per Firewall Unit. (Enterprise Licensing)	85
TF-PS-CUSTOM	2518	Prof Service	Professional Services for a Tufin solution as defined in a customized and agreed-upon SOW	1
TF-PS-DEPLOY-ENTPRS	3157	SW	Deployment Base Package for a new Enterprise Deployment.	1
TF-PS-DEPLOY-ST-ADD-FWUNIT-20	3157	SW	Deployment Package Option for 20 TOS Monitored Firewall Units.	4
TF-PS-INTEGRATE-SNOW	3157	SW	Deployment Package – Workflow Integrator (WFI) Integration with ServiceNow (up to 5 integration points).	1
TF-PS-EXTENSION-APP	3157	SW	Deployment Package Option for One (1) Extension and Integration Application	1
Option Year Period 1				
TF-HW-WTY-1YR (T1220)	2575	HW Maintenance	Appliance Support and Warranty 1-Year for T800, T1200, T820, T1220	3
TF-HW-WTY-1YR (T820)	2575	HW Maintenance	Appliance Support and Warranty 1-Year for T800, T1200, T820, T1220	1
TS-ENTPRS-FW-UNIT	3156A	SW License	Tufin Enterprise per Firewall Unit. (Enterprise Licensing)	85
Option Year Period 2				
TF-HW-WTY-1YR (T1220)	2575	HW Maintenance	Appliance Support and Warranty 1-Year for T800, T1200, T820, T1220	3
TF-HW-WTY-1YR (T820)	2575	HW Maintenance	Appliance Support and Warranty 1-Year for T800, T1200, T820, T1220	1
TS-ENTPRS-FW-UNIT	3156A	SW License	Tufin Enterprise per Firewall Unit. (Enterprise Licensing)	85
Option Year Period 3				
TF-HW-WTY-1YR (T1220)	2575	HW Maintenance	Appliance Support and Warranty 1-Year for T800, T1200, T820, T1220	3
TF-HW-WTY-1YR (T820)	2575	HW Maintenance	Appliance Support and Warranty 1-Year for T800, T1200, T820, T1220	1
TS-ENTPRS-FW-UNIT	3156A	SW License	Tufin Enterprise per Firewall Unit. (Enterprise Licensing)	85

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Option Year Period 4				
TF-HW-WTY-1YR (T1220)	2575	HW Maintenance	Appliance Support and Warranty 1-Year for T800, T1200, T820, T1220	3
TF-HW-WTY-1YR (T820)	2575	HW Maintenance	Appliance Support and Warranty 1-Year for T800, T1200, T820, T1220	1

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TS-ENTPRS-FW-UNIT	3156A	SW License	Tufin Enterprise per Firewall Unit. (Enterprise Licensing)	85
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3.b Includes IT: ☒ Yes ☐ No NAICS: *541519 and PSC 7J20*

3.c IGCE/Estimated dollar value:

The IGCE contains a 12-month base period and three 12-month option periods. The total amount of \$1,944,315.79. See breakdown:

Base Period: 9/30/2026-9/29/2027	\$799,261.11
Option Period 1: 9/30/2027-9/29/2028	\$354,634.21
Option Period 2: 9/30/2028-9/29/2029	\$381,684.61
Option Period 3: 9/30/2029-9/29/2030	\$408,735.86

4.a Identification of the exception to fair opportunity being used:

☐ FAR 16.505(b)(2)(i)(A) – The agency need for the supplies or services is so urgent that providing a fair opportunity would result in unacceptable delays.

☐ FAR 16.505(b)(2)(i)(B) – 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.

☐ FAR 16.505(b)(2)(i)(C) – The order must be issued on a sole-source basis in the interest of economy and efficiency because it is a logical follow-on to an order already issued under the contract, provided that all awardees were given a fair opportunity to be considered for the original order.

☐ FAR 16.505(b)(2)(i)(D) – It is necessary to place an order to satisfy a minimum guarantee.

☐ FAR 16.505(b)(2)(i)(E) – For orders exceeding the simplified acquisition threshold, a statute expressly authorizes or requires that the purchase be made from a specified source.

☒ FAR 16.505(a)(4) – The requirement is for an item peculiar to one manufacturer. (i.e., Brand Name specifications)

4.b Supporting rationale:

Brand name specification FAR 16.505 (a) (4) Tufin Maintenances Services and Consultant Support is a significant factor in supporting the Tufin infrastructure with efficiencies and experience by adjusting to new models which include similar components functionality. From a user perspective, efficiencies are realized through familiarity and training with system equipment and functionality, less disruptive.

The IRS has identified Tufin Enterprise to replace the FireMon Firewall Management Security Manager tool. With the agency's extensive network of on-premises and cloud-based firewalls, Tufin delivers continuous, real-time network visibility through dynamic topology mapping. The platform integrates with enforcement points—including firewalls, routers, cloud accounts, and Secure Access Secure Edge (SASE) services—via Application Programming Interface (API) and Command Line Interface (CLI) access to retrieve live configurations and routing data. This capability enables Tufin to generate an interactive, unified map that consolidates traffic flows, endpoints, and connectivity paths across hybrid environments.

Tufin provides comprehensive Security Policy Management capabilities, including change tracking, policy optimization and cleanup, device configuration compliance and audit, and network segmentation management. It enhances network visibility through detailed mapping, visualization, and path analysis to support efficient troubleshooting and operational insight.

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Additionally, Tufin integrates with ServiceNow to support ITSM change management processes. This integration enables automation of key functions such as proactive risk assessment, change request verification, change design and path identification, and target selection, streamlining workflow efficiency and reducing manual intervention.

Tufin will manage all Layer 3 network devices, enabling dynamic generation of comprehensive network device audit reports and facilitating rule cleanup for unused, redundant, overlapping, shadowed, or overly permissive firewall rules. This capability allows teams to quickly fulfill audit requests across all devices in real time and to regularly validate and remove unnecessary rules, thereby reducing the overall attack surface. Through automation, Tufin also standardizes the process of policy creation, modification, and retirement across all enforcement points. Each change, cleanup, and update is executed safely, consistently, and in full compliance with established standards—ensuring faster operations without increasing risk.

Internal review:

Requirement	Product A	Tufin	Product B
Centralized review of firewall policies	Meets	Meets	Meets
Policy recommendations based on environment (reordering, redundant, shadowed, etc.	Meets	Meets	Meets
Rule implementation automation features	Meets	Meets	Meets
Ability for centralized management and logging	Meets	Meets	Meets
Support for IRS PIV Implementation, TACACS, or SAML	Meets	Meets	Meets
Direct Vendor Supported ServiceNow Integration (new)	Partially Meets	Meets	Meets
Must be a US based company	Meets	Meets	Meets
IPv6 Compliant	Meets	Meets	Does not meet
508 Compliant	Meets	Does not meet	Does not meet
Audit logging	Meets	Meets	Meets

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API that does not require username/password authentication to use and is well documented	Does not meet	Meets	Partially meets
Customizable rule auditing reports	Meets	Meets	Meets
Centralized rule change tracking (who what when where)	Meets	Meets	Meets
Customizable compliance reporting	Meets	Meets	Meets
Support for custom SSL Certs	Meets	Meets	Meets
Role Based Access Controls	Meets	Meets	Meets
Active Directory Support for user level access	Meets	Meets	Meets
Must support Cisco (including VRF's), F5, Palo Alto, Fortinet for path analysis	Does not meet	Meets	Meets
Hardware and virtual appliances available	Meets	Meets	Meets
Partial policy shadowing review	Does not meet	Meets	Does not meet
Object based search of firewall policy	Does not meet	Meets	Does not meet
Real Time detailed analysis of policy utilization	Does not meet	Meets	Does not meet

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Infoblox IPAM integration	Does not meet	Meets	Does not meet
Qualys Scan result integration	Meets	Meets	Meets
Supports SASE Solutions	Meets	Meets	Meets
Supports AWS Govcloud Security Groups	Meets	Meets	Does not meet
User defined workflows	Meets	Meets	Meets
Multi-Site High Availability	Meets	Meets	Meets

Tufin is fully compliant with IRS IPv6 requirements and satisfies the enterprise's technical, security, and operational needs. In contrast, Products A and B contain multiple critical deficiencies—including the lack of Virtual Routing and Forwarding (VRF) support, missing mandatory integrations, outdated API authentication methods, and incomplete compliance with IRS security and operational requirements—that cannot be mitigated or accepted within the IRS enterprise environment. As a result, Tufin is the only solution that meets the comprehensive technical, cybersecurity, integration, and future-state network architecture requirements necessary for deployment across the IRS enterprise.

5. A determination that the anticipated cost to the Government will be fair and reasonable:

This requirement will be competed among Tufin resellers under the NASA SEWP V GWAC holders. All contractors responding to the notice of fair opportunity can submit a quote and have that quote fairly considered. Total evaluated price shall be the basis for evaluating price for award. Discounts offered by each quoter to its NASA SEWP V Contract price list will be evaluated. The Contract Specialist will determine fair and reasonable prices at the outset of adequate price competition in NASA SEWP GWAC (Government-Wide Acquisition Contract).

6.a Any other facts supporting this justification:

This investment aligns with and supports Cybersecurity and Infrastructure initiatives. The Tufin Firewall solution will provide developers, internal service providers, end users, and external IRS customers with a secure, stable, and seamlessly connected environment. Tufin ensures the security and reliability of network data transfers, reinforcing the IRS's commitment to maintaining a resilient and compliant infrastructure.

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6.b Attachments: ☒ Yes ☐ No IGCE, SOW and Acq Plan

7. A statement of the actions, if any, the Requiring Activity and Contracting Activity may take to remove or overcome any barriers that led to the exception to fair opportunity before any subsequent acquisition for the supplies and services is made:

IRS will continue to pursue market research, issue Request for Information requesting new solutions and the feasibility of utilizing other technologies. Also, IRS management will plan an acquisition strategy that complies with the requirements to obtain maximum competition in the future.

Failure to fully fund the Tufin acquisition will prevent the IRS from deploying a modern, integrated solution capable of enhancing firewall ticketing, policy management, and IRM compliance for policy synchronization and recertification across multiple IRS agencies. This shortfall will significantly impair the agency's ability to meet Trusted Internet Connections (TIC) 3.0 and IRM compliance requirements, resulting in a degradation of policy consistency and weakening of overall cybersecurity posture. Without an operational firewall policy management tool, essential functions such as policy auditing, monitoring, recertification, incident response, and forensic analysis will be severely limited—heightening the risk of undetected cyber threats and delaying recovery during security incidents.

In addition, the absence of an effective policy monitoring capability increases the likelihood of audit findings, operational downtime (particularly during Filing Season), and potential exposure of taxpayer data. These operational and compliance gaps would elevate security, reputational, and mission risks during periods of peak network and data activity. I

8. Certifications and Approvals:

8.a Program Office Certification (Requiring Activity). I hereby certify that any supporting information and data provided (e.g., the Government's minimum needs or requirements, or other rationale for the limited sources) and which form the basis for this justification for an exception to fair opportunity, are accurate and complete to the best of my knowledge and belief.

Name: Lisa Connor

Date: _____

Signature: Lisa McVay Connor Digitally signed by Lisa McVay Connor
Date: 2026.09.02 12:42:05 -04'00'

8.b Contracting Officer Certification and Approval. I certify this justification for an exception to fair opportunity is accurate and complete to the best of my knowledge and belief. Therefore, unless additional approvals are required as prescribed below, as the authorized contracting officer for this acquisition, I hereby approve the processing of this requirement based on the authority specified in 4.a above.

Name: Fatima Paen

Date: _____

Signature: Fatima A. Paen Digitally signed by Fatima A. Paen
Date: 2026.09.02 13:38:24 -04'00'

9. Additional Reviews and Approvals (As applicable):

9.a Bureau Chief Information Officer or Authorized Designee (for IT requirements that are over \$5 million, but not exceeding \$90 million) (Contracting Activity). I have reviewed

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this justification and find it to be accurate and complete to the best of my knowledge and belief, and representative of the Government's need. Therefore, I hereby consent to the approval of this justification. (Note: The Bureau CIO may delegate their authority for proposed contracts over \$5 million, but not exceeding \$15 million to the Associate Bureau CIO(s).)

Name: _____ **Date:** _____

Signature: _____

9.b Advocate for Competition (if over \$900,000, but not exceeding \$20 million) (Contracting Activity). I have reviewed this justification for an exception to fair opportunity and find it to be accurate and complete to the best of my knowledge and belief. Therefore, unless additional approvals are required as prescribed below, as the ordering activity's Advocate for competition, I hereby approve this justification based on the authority specified in 4.a above.

Name: Julius Bradshaw **Date:** 9/10/2026

Signature: Julius S. Bradshaw Digitally signed by Julius S. Bradshaw
Date: 2026.09.10 15:27:15 -04'00'

9.c Head of the Procuring Activity or Authorized Designee (if over \$20 million, but not exceeding \$90 million) (Contracting Activity). I have reviewed this justification for an exception to fair opportunity and find it to be accurate and complete to the best of my knowledge and belief. Therefore, unless additional approvals are required as prescribed below, as the head of the procuring activity or authorized designee, I hereby approve this justification based on the authority specified in 4.a above.

Name: _____ **Date:** _____

Signature: _____

9.d Treasury Chief Information Officer (for IT requirements that are over \$90 million). I have reviewed this justification and find it to be accurate and complete to the best of my knowledge and belief, and representative of the Government's need. Therefore, I hereby consent to the approval of this justification.

Name: _____ **Date:** _____

Signature: _____

9.e Senior Procurement Executive (if over \$90 million) (Contracting Activity). I have reviewed this justification for an exception to fair opportunity and find it to be accurate and complete to the best of my knowledge and belief. Therefore, as the senior procurement executive, I hereby approve this justification based on the authority specified in 4.a above.

Name: _____ **Date:** _____

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Signature: _____