

**JUSTIFICATION AND APPROVAL FOR OTHER THAN FULL AND OPEN
COMPETITION
41 U.S.C. 3304(a)(2)**

Pursuant to the requirements of the Competition in Contracting Act (CICA) as implemented by the Federal Acquisition Regulation (FAR) 6.103 (FAR Class Deviation 25-11¹) and in accordance with the requirements of FAR/RFO 6.104, the justification for the use of the statutory authority under RFO 6.103 is justified by the following facts and rationale required under RFO 6.104-1 as follows:

1. Agency and Contracting Activity.

The Department of Homeland Security (DHS), Office of Procurement Operations (OPO), on behalf of the Office of the Chief Human Capital Officer, entered into a contract on a basis other than full and open competition.

2. Nature and/or Description of the Action being Approved.

(a) Nature of action: DHS awarded purchase order 70RDA226P00000018 on August 29, 2026, using the unusual and compelling urgency authority after soliciting only one source, to support an urgent requirement for event logistics support including design, rigging, electric, and equipment rentals, for the DHS Career Expo being held on September 1-2, 2026.

(b) Name and address of the contractor: Hale Expo Services, LLC

(c) Contract type: Firm-Fixed Price

(d) Estimated total value: \$655,518.55.

(e) Type of funding: Operations and Support Funds

(f) Year of funding: Fiscal Year 2026

(g) Solicitation number: N/A

(h) Background information about the requirement. The urgent award was required due to a late change to the original venue location on August 27, 2026 and the decision to relocate to a nearby United States Coast Guard facility to prevent cancellation of the event.

¹ In this document, citations to RFO Parts 6, 10, 15, 25 are citations specifically to FAR Class Deviation 25-11 for FAR Part 6, FAR Class Deviation 25-06 for FAR Part 10, FAR Class Deviation 26-08 R1 for FAR Part 15, and FAR Class Deviation 25-09 R1 for FAR Part 25, which were issued as part of the Revolutionary FAR Overhaul (RFO), implemented in response to Executive Order 14275, *Restoring Common Sense to Federal Procurement*, signed April 15, 2025.

3. **Description of Supplies/Services.**

The purpose of this requirement was to procure various logistical services in support of the Career Expo held on September 1-2, 2026. The period of performance was for five days, from August 29, 2026 to September 3, 2026. The main tasks included: 1) rigging and setup, 2) design/layout based on the provided space, 3) setting up electrical connections (such as generators and cables), 4) providing washroom trailers, 5) providing tent pole structures, and 6) providing signage and pamphlets. The services also included dismantling and removing the equipment and materials at the conclusion of the event.

4. **Identification of Statutory Authority Permitting Other Than Full and Open Competition.**

The statutory authority permitting other than full and open competition is 41 U.S.C. 3304(a)(2) implemented by FAR/RFO Subpart 6.103-2 entitled “Unusual and compelling urgency.” The period of performance was five days and so did not exceed the 150-day limitation at HSAR 3006.103-2(c)(70)) (HSAR Class Deviation 25-01).

5. **Demonstration that the proposed contractor’s unique qualifications or the nature of the acquisition requires use of the authority cited.**

The nature of this acquisition required use of the unusual and compelling urgency authority because DHS had fewer than five calendar days, including an intervening weekend, to relocate and prepare the DHS Career Expo after the original venue notified DHS that it could no longer support the event.

The DHS Career Expo serves as a premier, large-scale hiring event designed to recruit talented professionals for mission-critical roles across multiple DHS components and fulfills the following purposes:

- **Accelerate Recruitment:** Fill thousands of high-priority vacancies in law enforcement, border security, cybersecurity, emergency management, and administrative support.
- **Connect Directly:** Provide a centralized venue where prospective candidates can meet face-to-face with recruiters and hiring managers from various DHS agencies (such as CBP, ICE, TSA, FEMA, and the U.S. Secret Service).
- **Simplify Access:** Demystify the complex federal hiring process by offering transparent guidance and direct lines of communication.

There are also benefits for job seekers who participate, including:

- **On-Site Processing:** Expedite applications through in-person resume reviews, interview guidance, and—at select events—completed steps like fingerprinting, drug testing, and fitness evaluations.
- **Tentative Job Offers:** Qualified applicants have the unique opportunity to interview and receive on-the-spot tentative job offers.

- **Career Guidance:** Access tailored advice on navigating USAJOBS, translating military experience into federal competencies, and optimizing federal resumes.

On average, DHS organizes two DHS Career Expos a year in various locations throughout the country. For the September 2026 Expo, DHS selected the Buffalo, NY location for the event. A venue was identified and contracted with on August 4, 2026. Immediately following the purchase order award, DHS began promoting the event to allow time for participants outside the Buffalo, NY region to prepare travel arrangements.

On August 27, 2026 at 4:06 pm, the venue contacted DHS to notify the agency that it would no longer be able to support the event. After considering whether to cancel the event or relocate the Expo, DHS determined that it would relocate to an alternate site to avoid cancelling the Career Expo due to the serious financial and operational injury of a last-minute cancellation to DHS and the financial burden on job seekers, especially those that had incurred expenses to arrange travel to Buffalo, NY for the event. The notice occurred fewer than five calendar days before the Expo was scheduled to begin, creating an urgent need for DHS to identify a replacement location and obtain logistics support capable of preparing the new site before September 1, 2026. Because the event site had to be prepared before September 1, 2026, DHS could not delay award to conduct full and open competition without risking cancellation of the Expo or failure to have the replacement location ready for attendees, recruiters, and hiring personnel.

On August 28, 2026, DHS identified a nearby United States Coast Guard facility that would be suitable for relocating the event. This new location required similar logistics services and rental equipment to those planned for the original venue; however, the change from an indoor to an outdoor location also required additional services and equipment. The compressed timeline required immediate contractor mobilization, including a site walkthrough, revised layout planning, equipment confirmation, delivery, installation, and setup over the intervening weekend. These time-sensitive tasks had to be completed before the Expo opened on September 1, 2026.

Given the limited time between the loss of the original venue and the scheduled start of the Expo, DHS could not conduct full and open competition and solicited only Hale Expo Services, the only known source capable of meeting the required performance timeline. Hale Expo Services had been subcontracted by the original venue to provide event logistics support and was already familiar with the DHS Career Expo's requirements, schedule, anticipated attendance, and equipment requirements. Based on its prior planning and immediate availability, Hale Expo Services was the only company known to DHS to be knowledgeable about the requirements and prepared to adapt to the new location on the short timeline required.

Once the new location was finalized on August 28, 2026, Hale Expo Services was able to be onsite that afternoon to provide a walkthrough of the new requirements, such as the setup of tents and the rental and installation of outdoor washroom trailers, and was ready to implement the setup over the weekend to ensure the space was ready for the event beginning on September 1, 2026. Any delay associated with soliciting, evaluating, and awarding to

additional sources would have jeopardized the event and seriously injured the Government financially and otherwise by risking cancellation of the event, waste of Government travel and planning costs, disruption to registered attendees, and delay in recruitment for critical DHS positions.

Failure to act immediately would have resulted in serious financial injury to the Government and others. Before the original venue notified DHS that it could no longer support the event over 75 DHS recruiters and hiring personnel had made financial arrangements that were outside the cancellation period and would have resulted in wasteful spending. There were also 1200 job seekers registered to attend the event, with approximately 300 traveling from outside the Buffalo, NY region. In addition, cancellation of the DHS Career Expo would have delayed DHS's ability to fill critical DHS vacancies needed to support the DHS mission.

6. Description of Efforts Made to Ensure that Offers are Solicited from as Many Potential Sources as is Practicable.

Due to the late change in venue and the need for immediate mobilization over the intervening weekend, the Contracting Officer determined that soliciting additional sources was not practicable. Hale Expo Services was the only known source with prior knowledge of the requirement, immediate availability, and the ability to conduct a same-day site walkthrough and complete setup before the September 1, 2026, event start date. A SAM.gov presolicitation posting was not required in accordance with FAR 5.101 (b)(2).

7. Determination by the Contracting Officer that the Anticipated Cost to the Government will be Fair and Reasonable.

The Contracting Officer determined the pricing to be fair and reasonable based on pricing for the original venue logistics support task order and similar Career Expo events.

8. Description of Market Research.

There was not sufficient time to conduct additional market research considering the rapid timeframe between the loss of the original venue, identification of the new location, and the scheduled start of the event. Most of these services are typically procured through coordination with the venue selected to hold the event if that venue only allows services to be performed by its own entity or its preferred vendors, which is standard for renting large convention and expo venues.

9. Any Other Facts Supporting the Use of Other Than Full and Open Competition.

There are no additional facts supporting this justification.

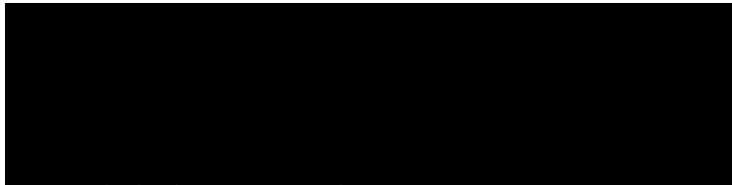
10. A Listing of the Sources, if Any That Expressed, in Writing, an Interest in the Acquisition.

No other sources expressed interest in this acquisition.

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 Supplies or Services Required.

When not required to contract with a specific company associated with a venue, DHS will issue procurements for these services competitively by issuing a combined synopsis/solicitation on SAM.gov.

12. Technical/Requirements Personnel Certification. I certify this requirement meets the Government's minimum need and that the supporting data, which forms a basis for this justification, is complete and accurate.



Technical Representative

Date

APPROVAL:

PAULA K NUSBAUM

Digitally signed by PAULA K NUSBAUM
Date: 2026.09.16 15:48:44 -04'00'

Paula Nusbaum
Contracting Officer

Date