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# Decision

**Matter of:** SOS International, LLC

**File:** B-423516; B-423516.2

**Date:** July 29, 2025

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Wade L. Brown, Esq., and Paula S. Klotzbach, Esq., Department of the Army, for the agency.  
Todd C. Culliton, Esq., and Tania Calhoun, Esq., Office of the General Counsel, GAO, participated in the preparation of the decision.

## DIGEST

1. Protest that the agency unreasonably evaluated proposals is denied where the record shows that the evaluation was consistent with the proposals' contents and terms of the solicitation.
2. Protest that the agency unreasonably conducted the best-value tradeoff analysis is denied where the record shows that the agency compared proposals and considered their relative merit in accordance with the terms of the solicitation.

## DECISION

SOS International, LLC (SOSi), of Reston, Virginia, protests the issuance of a task order to Peraton, Inc., of Herndon, Virginia, under request for proposals (RFP) No. W900KK-25-R-A005, issued by the Department of the Army, Army Material Command for information technology (IT) services. SOSi argues that the agency unreasonably evaluated proposals and improperly conducted the tradeoff analysis.

We deny the protest.

## BACKGROUND

On December 17, 2024, the Army issued the RFP against the General Services Administration's Alliant 2 governmentwide acquisition contract to procure IT and

computing support services for the Army Intelligence Center of Excellence (*i.e.*, Military Intelligence Information Technology Support (MIITS)). Agency Report (AR), Tab 4, RFP at 1-2; AR, Tab 5, RFP, Performance Work Statement (PWS) at 5-6; Combined Contracting Officer's Statement and Memorandum of Law (COS/MOL) at 2.<sup>1</sup> The RFP was conducted using the procedures set forth under Federal Acquisition Regulation (FAR) section 16.505. COS/MOL at 2. The selected contractor would be required to provide numerous IT services, such as systems and database administration; field support engineering; cyber security, information assurance, and data governance; and modeling, simulation, and exercise support. PWS at 6. Amongst others, annual support requirements include supporting 10,500 workstations, 4,500 simultaneous users, 7,000 virtual desktops, 2,000 supporting servers, 9,000 thin clients, 4,500 training laptops, 5 closed networks, and 4 data centers. *Id.* at 6-7.

The RFP contemplated the award of a hybrid contract containing fixed-price and cost-reimbursable contract line items. RFP at 3-14. The contract is to be performed over a 10.5-month base period and four 12-month option periods. *Id.*

Award would be made on a best-value tradeoff basis considering technical and price factors. AR, Tab 23, RFP, Evaluation Criteria at 1. Technical factors, listed in descending order of importance, were program management, technical approach, and corporate experience. *Id.* Each technical factor was more important than the price factor and, when combined, the technical factors were significantly more important than the price factor. *Id.*

Prior to the January 17, 2025, close of the solicitation period, four offerors, including SOSi and Peraton, submitted proposals. AR, Tab 61, Source Selection Decision (SSD) at 2. The Army's evaluation produced the following relevant results:

|                       | SOSi             | Peraton          |
|-----------------------|------------------|------------------|
| Program Management    | Purple/Good      | Blue/Outstanding |
| Technical Approach    | Blue/Outstanding | Blue/Outstanding |
| Corporate Experience  | Purple/Good      | Purple/Good      |
| Total Evaluated Price | \$186,269,331    | \$206,523,543    |

*Id.* at 4.<sup>2</sup> When comparing proposals, the source selection authority (SSA) concluded that Peraton's proposal was the most advantageous. *Id.* at 54. The SSA determined that Peraton offered significant advantages under the program management factor. *Id.*

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<sup>1</sup> The Army Intelligence Center of Excellence, located at Fort Huachuca, Arizona, trains and educates military intelligence soldiers. AR, Tab 5, PWS at 5.

<sup>2</sup> In evaluating proposals, the agency used a combined color/adjectival rating scheme consisting of the following: blue/outstanding; purple/good; green/acceptable; yellow/marginal; and, red/unacceptable. AR, Tab 23, RFP, Evaluation Criteria at 4.

at 49-50. While SOSi was lower priced, the SSA determined the advantages and innovations included in Peraton's proposal were worth the \$3.6 million per year (\$20.25 million total) price premium. *Id.* at 54.

On April 23, the Army issued the task order to Peraton and notified SOSi that the firm's proposal was unsuccessful. COS/MOL at 9. AR, Tab 50, SOSi Notice of Unsuccessful Offeror at 1. Following receipt of its debriefing, SOSi filed this protest with our Office.<sup>3</sup>

## DISCUSSION

SOSi raises multiple allegations challenging the agency's conduct of the acquisition. Principally, SOSi argues that the agency unreasonably evaluated both its and Peraton's proposals under the program management factor. SOSi also argues that the agency unreasonably conducted the tradeoff analysis.

We have reviewed all of SOSi's allegations, and do not find that any provide us with a basis to sustain the protest. We discuss illustrative examples below, but first, we note at the outset, that in reviewing an agency's evaluation of proposals and source selection decision, it is not our role to reevaluate submissions; rather, we examine the supporting record to determine whether the evaluation and decision were reasonable, consistent with the stated evaluation criteria, and adequately documented. *Innovative Mgmt. Concepts, Inc.*, B-408070.2, Dec. 4, 2013, 2014 CPD ¶ 49 at 3. A protester's disagreement as to the relative merits of the competing proposals does not establish that the evaluation or selection decision were unreasonable. *Id.*

### Program Management Evaluation

By way of additional background, under the program management factor, the RFP instructed each offeror to submit a project management plan (PMP), a small business participation plan, and a transition phase-in plan. AR, Tab 20, RFP, Instructions at 18-20. The PMP should detail the offeror's approach for assuming overall project management, contract management, and administrative responsibilities for the contract. *Id.* at 18. It should include a management description, which identifies key personnel and provides clear lines of authority between personnel. *Id.* Each offeror was instructed to provide letters of commitment and resumes for all identified key personnel. *Id.* Each offeror should also explain how it will maintain an adequate workforce for weekdays, as well as extended hours. *Id.* at 19.

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<sup>3</sup> This protest is within our jurisdiction to hear protests of task orders valued in excess of \$10 million placed under civilian agency IDIQ contracts. 41 U.S.C. § 4106(f)(1)(B); *NCI Info. Sys., Inc.*, B-417685, B-417685.2, Sept. 23, 2019, 2019 CPD ¶ 344 at 5 n.6. The authority under which we exercise our task order jurisdiction is determined by the agency that awarded the underlying IDIQ task order contract, which in this instance is the General Services Administration. *NCI Info. Sys., Inc.*, *supra*.

For the small business participation plan, the RFP instructed offerors to demonstrate a viable plan for meeting or exceeding the small business participation plan goal of no less than 25 percent of the contract value. AR, Tab 20, RFP, Instructions at 19. The solicitation advised that offerors must identify all members of its subcontracting team and then provide the estimated percentage of work to be performed by each subcontractor. *Id.* For the transition phase-in plan, offerors were required to articulate their plans for assuming responsibility of the PWS functions during a 45-day phase-in period. *Id.* at 20.

When evaluating each offeror's proposal under the program management factor, the RFP advised that the agency would consider the "comprehensiveness, feasibility, and innovativeness" of the PMP as a whole. AR, Tab 23, RFP, Evaluation Criteria at 7. The agency would examine whether the entire PMP demonstrated the ability to recruit and retain an effective workforce, provide total coverage of all PWS requirements, and minimal risk of unsuccessful performance. *Id.*

In addition to general consideration of the PMP, the RFP also advised that the agency would evaluate three areas. First, the RFP advised that the agency would evaluate the qualifications, and applicable certifications of proposed key personnel. RFP, Evaluation Criteria at 7. Resumes for key personnel indicating historical experience with key technical areas and leadership skills would be considered more favorably. *Id.*

Second, the RFP advised that the agency would evaluate each offeror's small business participation plan. AR, Tab 23, Evaluation Criteria at 7. In evaluating each offeror's small business participation plan, the RFP advised that the agency would consider the extent to which the offeror's plan met or exceeds the 25 percent requirement. *Id.* Additionally, the agency would evaluate whether the small business firms are specifically identified, if the commitments from the small businesses were enforceable, the complexity and variety of the tasks to be performed by the small businesses, the probability that the offeror will achieve the requisite small business participation, and the extent of small business participation in terms of value of the total acquisition. *Id.* at 7-8.

For the transition phase-in plan, the RFP advised that the agency would consider the feasibility and acceptability of each plan in relation to meeting the 45-day phase-in requirement. AR, Tab 23, Evaluation Criteria at 8. The transition phase-in plan would be evaluated for feasibility and acceptability with consideration paid to whether the offeror demonstrated a detailed and feasible approach, how the offeror will assume PWS requirements, and plan to mitigate unscheduled maintenance or emergencies. *Id.*

Additionally, to guide the agency's evaluation, the RFP contained "key evaluation definitions," which included definitions for "significant strength" and "strength." AR, Tab 23, RFP, Evaluation Criteria at 3.<sup>4</sup> A "significant strength" was defined as:

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<sup>4</sup> The "key evaluation definitions" included significant strength, strength, weakness, significant weakness, and deficiency. AR, Tab 23, RFP, Evaluation Criteria at 3.

An aspect of an [Offeror's] proposal that has appreciable merit or appreciably exceeds specified performance or capability requirements in a way that will be appreciably advantageous to the Government during contract performance.

*Id.* A “strength” was defined as:

An aspect of an Offeror's proposal that has merit or exceeds specified performance or capability requirements in a way that will be advantageous to the Government during contract performance.

*Id.*

#### SOSi's Program Management Evaluation

SOSi argues that it should have received two significant strengths for its proposed program management approach. Comments and Supp. Protest at 5-9. SOSi also argues that the agency unreasonably failed to follow the solicitation's evaluation methodology because it did not assign a strength, weakness, or deficiency when evaluating the firm's small business utilization plan and transition phase-in approach; instead, SOSi argues that the agency unreasonably used an “M” designation, even though that term was not defined in the solicitation. Protest at 26; *see also* Comments and Supp. Protest at 10-13. To this end, SOSi contends that the agency effectively converted the evaluation of these requirements from a qualitative appraisal to a consideration of technical acceptability. Protest at 26.

The agency counters that it reasonably evaluated SOSi's proposal under the program management factor, and that the protester's arguments simply disagree with its evaluation judgments. COS/MOL at 12-25.

The agency evaluated SOSi's proposal as warranting a rating of purple/good for the program management factor. AR, Tab 60, Source Selection Evaluation Board (SSEB) Report at 14. In arriving at this rating, the Army found that SOSi's PMP demonstrated two strengths. *Id.* at 37-38. The Army assigned one strength because SOSi demonstrated a strong approach to assuming overall program management and then subsequently maintaining full coverage of contractor responsibilities by demonstrating comprehensive plans for recruiting, cross-training, certifying, and retaining personnel. *Id.* at 37. The Army assigned the second strength because the firm's proposed key personnel exceeded the personnel qualifications. *Id.* at 38. The agency noted that the experience, qualifications, and certifications of the proposed key personnel “have substantial merit relative to the key technical areas of the [requirement] in a way that is advantageous to the Government[.]” *Id.*

The Army evaluated SOSi's small business participation plan as meeting the solicitation requirements. AR, Tab 60, SSEB Report at 39. The agency noted that SOSi's small business participation plan demonstrated a small business participation rate of [DELETED] percent, which exceeded the 25 percent requirement. *Id.* Similarly, the

Army evaluated SOSi's transition phase-in plan as meeting the requirement. *Id.* at 40-41. The agency noted that the plan included an "acceptable and feasible phase-in approach" because it demonstrated a milestone-based approach, collaboration with the outgoing contractor, and maximized retention of incumbent personnel. *Id.* at 40. The agency also noted that the firm's plan incorporated three key features detailing how the firm would transition effectively. *Id.* at 41.

As explained above, SOSi challenges the agency's evaluation of its program management approach. We discuss its allegations to the evaluation of its PMP, small business participation and transition phase-in plans, and overall rating separately.

#### Evaluation of SOSi's PMP

SOSi argues that the "strengths" it received for its PMP should have been "significant strengths." First, SOSi argues that the agency evaluated its key personnel as demonstrating "substantial merit," and such judgment is more consistent with the definition of a "significant strength" rather than just a "strength" per the definitions of the solicitation. Comments and Supp. Protest at 5-7; Supp. Comments at 16. Second, SOSi argues that its program management approach merited a "significant strength" because the agency evaluators "praised" its overall approach. Comments and Supp. Protest at 7; *see also* Supp. Comments at 16.

The agency counters that it reasonably evaluated SOSi's key personnel as a strength. COS/MOL at 11. The Army explains that it examined the experiences, qualifications, and certifications of SOSi's key personnel, and determined that they demonstrated substantial merit but did not warrant the highest rating. *Id.* at 12-13. Likewise, the Army argues that it reasonably considered SOSi's program management approach as demonstrating merit but not as being particularly advantageous. *Id.* at 17.

The evaluation of technical proposals and the determination of their relative merit are generally matters within the agency's discretion, which our Office will not disturb unless they are shown to be unreasonable or inconsistent with the solicitation's evaluation criteria. *Navarro Research and Eng'g, Inc.*, B-418602.2, B-418602.5, June 10, 2020, 2020 CPD ¶ 193 at 4. Adjectival descriptions and ratings serve only as a guide to, and not a substitute for, intelligent decision-making. *Id.* The essence of the evaluation is reflected in the evaluation record itself--the actual evaluation findings--and not the adjectival descriptions. *Id.*

We do not find that the agency unreasonably failed to assign "significant strengths" to SOSi's proposal for its key personnel and overall program management approach. As to SOSi's key personnel, the record shows that the agency fully considered the proposed individuals' experiences, qualifications, and certifications as required by the solicitation. AR, Tab 23, RFP, Evaluation Criteria at 7; AR, Tab 5, RFP, PWS at 15; AR,

Tab 5f, RFP, App'x G, Personnel Qualifications at 1.<sup>5</sup> Indeed, the agency noted that SOSi's program manager was a proven leader with experience directing over [DELETED] persons, the chief technology architect exceeded the certifications requirements, and that the battle simulations lead had [DELETED] years' experience with battle simulations systems. AR, Tab 47, SSEB Report at 38. Despite those offerings, and as noted above, the agency concluded that they were "advantageous," as opposed to "appreciably advantageous" to the government's requirement. *Id.*

While SOSi argues that the RFP required the agency to assign a "significant strength" because the Army determined that its key personnel demonstrated "substantial merit" and the adjectives "substantial" and "appreciable" are synonymous, we are unpersuaded. See Comments at 6; Protest at 22. Consistent with the agency's position, we read the definitions of "strength" and "significant strength" as having two parts; first, the agency must determine that the aspect under examination exceeds performance requirements, and second, the agency must determine how advantageous that aspect will be to the government's requirement. See COS/MOL at 16-17; AR, Tab 23, RFP, Evaluation Criteria at 3.

The record shows that the agency considered SOSi's key personnel as greatly exceeding the performance requirements but nevertheless simply viewed that combination of experience, qualifications, and certifications as just "advantageous." AR, Tab 60, SSEB Report at 38. To the extent the protester argues that its combination of experience, qualifications, and certifications exceeded performance requirements demonstrates an "appreciably advantageous" proposal, Protest at 22, such argument merely disagrees with the agency's evaluation judgment and does not provide us with a basis to sustain the protest. *Cf. Navarro Research and Eng'g, Inc., supra* at 6 (protest allegation that the firm deserved a significant strength because one of its proposed key personnel had received a Presidential award was denied where the record showed that the agency had fully considered the individual's background as part of its evaluation, and any dispute as to the worth of the Presidential award represented disagreement with the agency's judgment). Thus, we do not find that the agency unreasonably evaluated the protester's proposal because we disagree that a finding that the proposed key personnel's qualifications had "substantial merit" necessitated a finding that the key

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<sup>5</sup> The RFP identified three individuals as key personnel: the program manager, chief technology architect, and the battle simulations lead. AR, Tab 5, RFP, PWS at 15. The program manager required 10 years' experience managing similarly sized organizations; experience with relevant IT systems; a qualifying bachelor's degree or substituted experience; and an IT security certification. AR, Tab 5f, RFP, App'x G, Key Personnel Qualifications at 1. The chief technology architect required a bachelor's degree; 10 years' experience with relevant IT systems; and multiple certifications, such as Cisco Certified Network Assistant. *Id.* The battle simulations lead required 10 years' experience battle simulations environments; extensive experience with modern and legacy battle simulations systems; a qualifying bachelor's degree; and an IT certification. *Id.*

personnel were “appreciably advantageous” to the government’s requirement. Accordingly, we deny the protest allegation.

Likewise, we do not find that the agency unreasonably evaluated the firm’s overall program management approach. The record shows that the agency fully considered the firm’s overall program management approach, and noted several beneficial aspects, such as plans to have all personnel hold baseline certifications, cross-train personnel, and emergency and unscheduled support. AR, Tab 60, SSEB Report at 37. The agency concluded that these features were comprehensive, feasible, and innovative, and reduced the risk of unsuccessful performance. *Id.*

SOSi argues that the agency’s characterization of the firm’s overall program management approach as “‘comprehensive,’ ‘highly feasible,’ and having sufficient innovative characteristics to reduce performance risk” means that its approach must have been evaluated as “appreciably advantageous.” See Protest at 24. The record does not support this argument. Consistent with the definitions of “strength” and “significant strength” set forth in the RFP, we view the record as showing that the agency considered the firm’s approach as including some highly favorable components that were advantageous, but that these components and the overall approach simply were not “appreciably advantageous” to the government. Thus, we do not find that the agency unreasonably failed to assign a “significant strength” because, while the record shows that the agency considered the program management approach to contain beneficial features, the agency still evaluated the features as not being “appreciably advantageous.” Accordingly, we deny the protest allegation.<sup>6</sup>

#### Small Business Participation Plan and Transition Phase-In

SOSi contends that the agency unreasonably used an “M” designation when evaluating the firm’s small business utilization plan and transition phase-in approach, as opposed to assigning strengths and weaknesses. Comments and Supp. Protest at 10-11; Supp. Comments at 16. SOSi argues that the RFP did not define “M” as one of the key evaluation definitions, and thus, the agency’s use of this evaluation tool was

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<sup>6</sup> The protester also argues that its program management approach should have received individual strengths for each feature, as opposed to a collective strength, and that the agency restricted proposals from receiving more than four strengths. Comments at 7-9. The agency responds that it considered all features of the firm’s plan and ultimately concluded that the totality of the firm’s plan merited a single strength. COS/MOL at 19. The agency also responds that the record contains no evidence that the agency restricted its proposal to receiving only four strengths. *Id.*

We have no basis to question the reasonableness of the evaluation because the record shows that the agency fully considered the features and concluded that they collectively amounted to a strength. Additionally, we agree with the agency that the record contains no evidence that the agency artificially restricted the protester’s proposal to receiving four strengths.



inconsistent with the solicitation. Comments and Supp. Protest at 10-11. The agency responds that it considered the firm's small business utilization plan and transition phase-in approach as "meeting" the agency's requirement and assigned an "M" rating to denote such conclusions. COS/MOL at 21. The agency argues that this rating was consistent with the solicitation's terms, which provided that the government would evaluate each offeror's ability to meet or exceed expectations. *Id.*

For ease of reference, the RFP advised that the agency would assess each offeror's small business utilization plan and transition phase-in approach under the program management factor. AR, Tab 23, RFP, Evaluation Criteria at 7-8. The agency would assess the small business utilization plan for the following:

[E]valuating the extent to which the offeror meets or exceeds the Government's [small business] [p]articipation requirement/objective of no less than 25 [percent] of the offeror's [total proposed price]. Proposals not meeting the required [small business] [p]articipation percentage requirement of no less than 25 [percent] of the [total proposed price] for each 12-month period . . . will be evaluated less favorably.

*Id.* at 7. When evaluating each plan, the agency would examine several features, such as whether the firms were identified, the extent of the commitment of the small businesses, and the complexity of the work to be performed by the committed small businesses. *Id.* at 8.

The agency would assess the transition phase-in approach for the following:

[E]valuating the feasibility and acceptability of the Offeror's phase-in approach to assume full performance of the requirements of this contract [in accordance with] PWS paragraph 2.7 & 2.7.1.

AR, Tab 23, RFP, Evaluation Criteria at 8. The RFP advised that the agency would assess several features, such as how each offeror would assume full responsibility duties and whether the offeror could satisfy the 45-day transition-in requirement, for feasibility and acceptability. *Id.*

The agency evaluated both SOSi's small business utilization plan and transition phase-in approach as meeting requirements and assigned an "M" rating. AR, Tab 60, SSEB Report at 38-41. For the small business utilization plan, the agency noted the following:

The Offeror has sufficiently met solicitation requirements through the identification of at least 25 [percent] of work volume directed to [small business] firms as they are defined in FAR Part 19, has provided enforceable commitments and teaming agreements, identified the [small businesses] by name, and sufficiently defined the complexity and variety of work to which its [small business] teammates will be assigned and/or

will perform. The Offeror's approach to [small business] participation is comprehensive, feasible, and sufficiently innovative to meet the Government's [small business] participation objectives outlined in the solicitation and the Government finds no relative impact on performance risk as a result of the Offeror's approach.

*Id.* at 39. For the transition phase-in approach, the agency's evaluation was as follows:

[The Offeror's PMP] sufficiently addresses the requirements of the Government's phase-in requirements and articulates an approach that is likely to ensure a stable transition and the assumption of full performance of the requirements of this contract [in accordance with] PWS paragraph 2.7 & 2.7.1. The Offeror's PMP describes an acceptable and feasible phase-in approach that is comprehensive, feasible, and sufficiently innovative to meet the Government's requirements outlined in the solicitation . . . and the Government finds no relative impact to performance risk as a result of the Offeror's approach.

*Id.* at 40-41.

We find nothing unreasonable about the agency's evaluation and use of an "M" rating. The RFP advised that the agency would evaluate both the small business utilization plan and transition phase-in approach for whether these aspects can meet or exceed expectations. Our review confirms that the agency evaluated these features in this manner because the evaluation notes explicitly describe as much. The assignment of an "M" rating is unobjectionable because the record shows that the agency used it as a shorthand designation for a proposal that lacked strengths, weaknesses, or deficiencies of any kind.<sup>7</sup>

While SOSi argues that the agency was limited to assigning the ratings outlined in the list of "key evaluation definitions," we do not find that argument credible. The RFP did not restrict the agency to using the "key evaluation definitions," and we see nothing objectionable in the use of another adjective to identify a situation where the offeror's proposal did not warrant strengths, weaknesses, or any other of the defined terms. See AR, Tab 23, RFP, Evaluation Criteria at 3.

In any event, our decisions have long recognized that agencies may apply evaluation considerations that are not expressly outlined in the RFP where those concerns are logically and reasonably encompassed within the stated evaluation criteria. See *Picturae, Inc.*, B-419233, Dec. 30, 2020, 2021 CPD ¶ 13 at 4. Here, the use of an "M" rating is logically and reasonably encompassed by the solicitation because the evaluation criteria explicitly provides that the agency would assess both the small

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<sup>7</sup> The agency submitted a declaration from the SSEB chairperson confirming the SSEB used the "M" designation to denote a proposal meeting the RFP's terms but not offering any advantages or demonstrating any flaws. AR, Tab 61, Decl. of SSEB Chair at 1.

business utilization plan and the transition phase-in approach based on whether they meet or exceed expectations. Accordingly, we deny the protest allegation.

#### Overall “Good” Rating

SOSi argues that the agency unreasonably assigned a “good” rating to the firm’s program management approach because the evaluation more closely aligned with the definition of an “outstanding” rating. Comments and Supp. Protest at 12. SOSi asserts that the agency characterized its approach as having substantial merit and “‘comprehensive,’ ‘highly feasible,’” as well as containing “‘innovative approaches.’” *Id.* SOSi further asserts that the agency characterized its proposal’s risk of unsuccessful performance as anything other than low. *Id.* at 13. The agency responds that SOSi’s proposal did not warrant an “outstanding” rating because it did not receive a “significant strength.” COS/MOL at 25. The agency also responds that the agency reasonably considered the underlying merit of the proposal, and therefore, any dispute regarding the adjectival rating assigned is inconsequential. *Id.*

As additional background, the RFP defined an “outstanding” rating as follows:

Proposal demonstrates an exceptional approach and understanding of the requirements and contains multiple strengths and/or at least one significant strength, and risk of unsuccessful performance is low.

AR, Tab 23, RFP, Evaluation Criteria at 4. The RFP defined a “good” rating as:

Proposal indicates a thorough approach and understanding of the requirements and contains at least one strength or significant strength, and risk of unsuccessful performance is low to moderate.

*Id.*

We have no basis to object to the agency’s assignment of a “good” rating. Again, the agency assigned two strengths to the firm’s proposal. Thus, the firm’s proposal was ineligible for an “outstanding” rating because that rating required the assignment of at least one significant strength. Accordingly, the protest allegation is denied.

Moreover, even if we were to agree that the characterization of the beneficial features of SOSi’s proposal more closely aligned with the definition of a “significant strength,” we would not sustain the protest on this basis. Again, adjectival descriptions and ratings serve only as a guide to, and not a substitute for, intelligent decision-making. *Navarro Research and Eng’g, Inc., supra.* at 4. The essence of the evaluation is reflected in the evaluation record itself--the actual evaluation findings--and not the adjectival descriptions. *Id.* Thus, whether the agency ultimately assigned an “outstanding,” “excellent,” or other adjectival rating is, as the agency puts it, utterly inconsequential;

the only thing that matters is whether the agency reasonably recognized and considered the underlying technical merit, and it did so here.<sup>8</sup>

### Peraton's Program Management Evaluation

SOSi argues that the agency unreasonably evaluated Peraton's proposal under the program management factor. First, SOSi argues that the agency unreasonably evaluated aspects of Peraton's technical approach (*i.e.*, the [DELETED] program and the [DELETED]) as beneficial features because these were technical solutions unrelated to program management. Supp. Comments at 5-10. Second, SOSi argues that the agency unreasonably found Peraton's higher than average manpower levels as beneficial, and alternatively, SOSi challenges the agency's determination that Peraton proposed manpower levels that exceeded the historical averages. *Id.* at 10-12; Comments and Supp. Protest at 24.

The agency responds that it reasonably evaluated Peraton's [DELETED] and [DELETED] as beneficial features of the firm's program management plan because they enhance the firm's workflow, communication, and ability to adapt to new technologies. Supp. COS/MOL at 4-5. The agency also explains that it reasonably determined that Peraton's manpower levels represented a beneficial feature because it calculated the levels as exceeding the historical averages. Resp. to GAO Req. for Briefing at 2-5.

Again, the agency assigned Peraton an "outstanding" rating, concluding that the firm's program management approach demonstrated one significant strength and three strengths. AR, Tab 61, SSD at 28-32. The agency assigned the significant strength because it concluded that six features, including the [DELETED] and increased

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<sup>8</sup> SOSi raises a host of arguments asserting that the agency unequally evaluated its program management approach. Comments and Supp. Protest at 19-21, 23-24; Supp. Comments at 16-17. None provide us with a basis to sustain the protest because none allege that the agency evaluated identical features disparately. *Tiber Creek Consulting, Inc.*, B-422925, B-422925.2, Dec. 18, 2024, 2024 CPD ¶ 8 at 8 ("To prevail on an allegation of disparate treatment, a protester must show that the agency unreasonably assessed weaknesses or failed to assess strengths for aspects of its proposal that were substantively indistinguishable from, or nearly identical to, those contained in another proposal.").

As an example, SOSi argues that the agency unequally assigned multiple strengths to Peraton's proposal but combined all of SOSi's beneficial features into a single strength. Comments and Supp. Protest at 20. This allegation is factually insufficient because it does not show that both offerors proposed substantively indistinguishable features that were treated differently; rather, it only shows that the agency did not consider the features contained in SOSi's proposal as individually advantageous as those proposed by Peraton. Without some showing that the features were substantively indistinguishable, we have no basis to conclude that the agency unequally evaluated proposals.

manpower collectively demonstrated appreciable merit in terms of Peraton's organizational structure, workforce distribution, workflow alignment and synchronization, integration of new and innovative technologies, procurement and property management, and capacity to reduce risk in meeting modernization requirements. *Id.* at 28; *see also* Supp. COS/MOL at 10 ("Peraton's Significant Strength was not due to the [DELETED], [three other features], increased manpower, or [DELETED] as lone individual elements. It was the combination of these elements in support of providing a comprehensive approach to meeting the objectives of the PWS that resulted in distinguishing Peraton's proposal for this Factor.").

Regarding the firm's [DELETED] feature, the agency noted that it, and others, enhance the firm's corporate "reachback" and workforce efficiency and distribution. AR, Tab 60, SSEB Report at 70. The agency noted that the [DELETED] allowed the firm to better integrate emerging technologies to ensure that workflow was uninterrupted. *Id.* As for the [DELETED], the agency explained that this feature would reduce risk to performance and schedule by allowing the firm to more effectively utilize staff. *Id.* at 71. As for the manpower hours, the agency noted that Peraton proposed hours exceeding the historical averages. *Id.* at 70-71.

Turning to SOSi's argument that the agency unreasonably evaluated Peraton's [DELETED] and [DELETED] as features of the firm's PMP because these were technical solutions, we disagree. The RFP advised that a PMP demonstrating effective program management would be evaluated favorably. AR, Tab 23, RFP, Evaluation Criteria at 7 ("An Offeror's PMP that is comprehensive and that clearly meets the objectives set forth under [the RFP's instructions] with minimal risk and well-articulated innovative techniques, will be rated more favorably."); AR, Tab 20, RFP, Instructions at 18 ("The Offeror shall provide a [PMP] that details its approach for assuming the overall program management, contract management, and administrative responsibilities for the MIITS contract."). Similarly, the RFP advised that a PMP conveying total coverage for PWS functions would also be evaluated favorably. AR, Tab 23, RFP, Evaluation Criteria at 7 ("The Government will evaluate the [PMP] to ensure it clearly conveys total coverage while meeting the objectives of the MIITS PWS.").

Given these advisements, we find that both features were reasonably evaluated. As for the [DELETED], Peraton's proposal explains this feature is part of its management organization that, along with other components, provides "corporate reachback." AR, Tab 59, Peraton Program Management Proposal at 9-10. The [DELETED] supports Peraton's program managers by developing customized, modern technologies to support the agency's requirement, as well as providing deep technical support. *Id.* Further, this entity supports the program managers by participating in quarterly meetings to facilitate IT upgrades and respond to customer (*i.e.*, the agency's) needs. *Id.*

Regarding the [DELETED], this feature provides program situational awareness, transparency, and real-time communication through a platform facilitating intraorganizational reporting and status updates. AR, Tab 59, Peraton Program

Management Proposal at 12. The [DELETED] allows program staff to view detailed project status data. *Id.* Peraton explains this will increase overall program productivity because it will free staff for other tasks. *Id.* Thus, we find that the agency reasonably evaluated both features because the benefits offered were directly related to the evaluation criteria identified above.

Next, we discuss SOSi's challenge to the agency's evaluation of Peraton's manpower levels as beneficial. In its supplemental protest, SOSi argues that the RFP instructed offerors to demonstrate that they would maintain an adequate workforce to cover normal operations, and therefore, the agency unreasonably concluded that higher than average manpower levels were beneficial. Comments and Supp. Protest at 23. In its supplemental comments, SOSi argues that the agency unreasonably calculated Peraton's manpower levels as exceeding the historical averages by [DELETED] percent. Supp. Comments at 10-12. We do not find either argument persuasive.

First, the RFP did not preclude the agency from evaluating favorably Peraton's plan to staff the contract with more workers than the historical average. Critically, as noted above, the RFP advised that each offeror's ability to convey total coverage would be evaluated more favorably. Thus, an approach that increased an offeror's ability to provide total coverage for the work requirements could be viewed as advantageous. AR, Tab 23, RFP, Evaluation Criteria at 7. As a result, it was not unreasonable for the agency to conclude that proposing to perform the work requirements with staffing levels higher than the historical levels would increase Peraton's ability to perform the agency's requirements since more staff logically translates to a greater capacity to perform work.

Further, when providing the historical manpower levels, the RFP provided the following specific instruction:

The Government encourages each Offeror to develop their own unique approaches to satisfying future mission requirements that best demonstrates each company's unique skills, abilities, competencies, and experience and how their unique approach will innovatively leverage these skills, abilities, competencies, and experience to advantageously impact the future mission interests of the Government.

AR, Tab 12, RFP, Questions from Industry, Encl. 1. Thus, we disagree that the RFP limited offerors to proposing manpower levels at the historical averages because the RFP encouraged offerors to develop their own solutions for covering all PWS functions.

Second, we disagree that the agency unreasonably calculated Peraton's PMP as including [DELETED] percent more manpower hours. The agency explains, and our review confirms, that Peraton's proposed manpower levels exceed the historical average by at least [DELETED] percent. Agency Resp. to GAO Req. for Briefing at 3-4; see also AR, Tab 67, Peraton Price Proposal. Indeed, Peraton's price proposal and PMP shows that the firm proposed manpower levels totaling [DELETED] hours compared to the historical average of 200,196 hours. AR, Tab 67, Peraton Price

Proposal; AR, Tab 12, RFP, Answers to Industry Questions, Encl. 1; *see also* AR, Tab 59, Peraton Program Management Proposal at 11-12 (proposing 115.9 full-time equivalents (FTE)). Accordingly, we deny this protest allegation.<sup>9</sup>

### Selection Decision

As a final matter, SOSi contends that the agency improperly conducted the tradeoff analysis. SOSi argues that the SSA unreasonably determined that Peraton offered unique technical solutions. Supp. Comments at 14-15; *see also* Resp. to GAO Req. for Briefing at 5-7. SOSi claims that, like Peraton, it proposed a [DELETED], as well as advanced and innovative technologies. Supp. Comments at 14-15. Additionally, SOSi argues that the agency incorrectly determined that Peraton offered more overall manpower. *Id.*

The agency responds that it reasonably conducted the tradeoff analysis. Resp. to GAO Req. for Briefing at 5-9. The agency explains that it reasonably determined that Peraton offered unique solutions because SOSi's [DELETED] does not demonstrate the same benefits, the firm's technical solutions are not equivalent to Peraton's program management approach, and Peraton proposed more manpower hours than SOSi. *Id.*

As additional background, the SSA started the tradeoff analysis by comparing proposed program management approaches because that factor was the most important. AR, Tab 61, SSD at 49. The SSA noted that Peraton's program management approach was

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<sup>9</sup> SOSi's argument appears to be based on an RFP enclosure showing that the contract historically spread employees over seven general task areas. *See* Supp. Comments at 12; *see also* AR, Tab 12, RFP, Answers to Industry Questions, Encl. 1. Peraton proposed to organize staff over eight task areas, which did not correspond to the seven general task areas. AR, Tab 59, Peraton Program Management Proposal at 11-12. SOSi argues that the agency's evaluation should have only considered manpower levels associated with the seven general task areas, and as a result, it argues that the agency should not have considered all of Peraton's proposed manpower levels. Supp. Comments at 11-12; Resp. to GAO Req. for Briefing at 2-3. SOSi's argument amounts to reducing Peraton's proposed manpower levels by approximately [DELETED] FTEs. Supp. Comments at 12.

We see no reason why the agency should have excluded any of Peraton's proposed employees or manpower levels because the RFP advised that historical staffing data was provided for informational purposes only and that each offeror was encouraged to develop its own approach to satisfying the mission requirements. AR, Tab 12, RFP, Answer to Industry Questions, Encl. 1. Further, to the extent SOSi argues that the agency should have downgraded Peraton for not proposing sufficient manpower levels for a particular task area, *see* Resp. to GAO Req. for Briefing at 3-4, the agency explains, and we agree, that SOSi misinterprets Peraton's proposed organizational structure. *See* Agency Resp. to GAO Req. for Briefing at 4.

superior due to the [DELETED] and higher manpower levels. *Id.* at 49-50. For the technical approach corporate experience factors, the SSA determined that Peraton's and SOSi's proposals were relatively equal, but that Peraton's technical approach offered tools that will better improve the agency's prevailing training standard. *Id.* at 50-53. The SSA noted that Peraton's proposal had a \$20.2 million price premium when compared with SOSi; however, the agency noted that Peraton's proposed price was a better value since the firm offered [DELETED] percent more manpower, the additional manpower would better adapt the agency to emerging technologies, and superior modernization of agency IT architecture. *Id.* at 53-54.

Source selection officials have broad discretion in determining the manner and extent to which they will use the evaluation results: price and technical tradeoffs may be made, and the extent to which one will be sacrificed for another is governed only by the test of rationality and consistency with the solicitation's evaluation criteria. *Rigid Security Grp., Inc.*, B-421409.2, Aug. 14, 2023, 2023 CPD ¶ 200 at 11. In reviewing protests of an agency's selection decision, even in a task order competition as here, we do not conduct our own tradeoff analysis, but rather we examine the record to ensure that the selection official's judgments and determinations were reasonable and consistent with the solicitation and any applicable statutes and regulations. *Id.*

Here, we have no basis to object to the agency's tradeoff decision. The record shows that the agency compared the proposals and determined that the [DELETED] and increased manpower levels were distinguishing features between Peraton's and SOSi's proposals. Agency Resp. to GAO Req. for Briefing at 8-9. Further, consistent with the tradeoff analysis, the agency explains that, even though SOSi proposed a [DELETED], the firm's proposal was not as advantageous as Peraton's proposal because Peraton articulated how it would integrate its [DELETED] capabilities into its organizational structure and workflow distribution. *Id.* at 7-8.<sup>10</sup>; see also AR, Tab 61, SSD at 52-53. While SOSi may argue that its [DELETED] and other technical features were similar to Peraton's features, such argument merely disagrees with the SSA's judgment and does not provide us with a basis to sustain the protest. See *Innovative Mgmt. Concepts, Inc.*, *supra*.

Additionally, the agency reasonably concluded that Peraton's proposed manpower levels were higher than SOSi's proposed manpower levels. To arrive at this conclusion,

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<sup>10</sup> SOSi contends that the SSD did not compare its [DELETED] to Peraton's [DELETED] as part of the contemporaneous record and only offers a post-protest explanation supporting the tradeoff analysis. Resp. to GAO Req. for Briefing at 5. While our Office generally accords greater weight to contemporaneous evidence, we will consider post-protest explanations that provide a rationale for contemporaneous conclusions, so long as those explanations are credible and consistent with the contemporaneous record. *Engility Servs., LLC*, B-416588.3, B-416588.4, Mar. 20, 2020, 2020 CPD ¶ 110 at 5 n.2. Here, we find nothing objectionable about the agency's post-protest explanation because it is consistent with the judgments made in the tradeoff analysis and merely provides additional rationale.



the agency calculated the manpower levels using the labor hours proposed in each offeror's price proposal. Agency Resp. to GAO. Req. for Briefing at 5. Ultimately, the agency determined, and the record confirms, that SOSi proposed a total of [DELETED] labor hours, which was about [DELETED] percent less than the [DELETED] labor hours proposed by Peraton. *Id.* Thus, we do not find that the tradeoff analysis was unreasonable because the agency compared proposals, determined that Peraton's proposal offered more beneficial features, and then concluded that those features were worth the price premium. Accordingly, we deny the protest allegation.

The protest is denied.

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General Counsel