



Decision

Matter of: Change Agents 360, LLC--Reconsideration

File: B-424114.2

Date: April 7, 2026

Erik Reynolds, for the requester.
Danielle K. S. Lindermuth, Esq., Department of State, for the agency.
Christopher Alwood, Esq., and Alexander O. Levine, Esq., Office of the General Counsel, GAO, participated in the preparation of the decision.

DIGEST

Request for reconsideration is denied where the requester has not shown that our prior decision contained an error of fact or law warranting reversal or modification.

DECISION

Change Agents 360, LLC, a small business of Atlanta, Georgia, requests reconsideration of our decision in *Change Agents 360, LLC*, B-424114, Dec. 23, 2025 (unpublished decision), in which we dismissed its protest of the award of a contract to Oready LLC, of Las Vegas, Nevada, under request for quotations (RFQ) No. 19M03025Q0022. The RFQ was issued by the Department of State for commercial training services to prepare consulate staff for the planned relocation of the United States Consulate in Casablanca, Morocco. Change Agents argues that our decision contained errors of fact that warrant reconsideration.

We deny the request for reconsideration.

BACKGROUND

The Department of State issued the RFQ on September 16, 2025, seeking quotations for the development and delivery of a “condensed change management training program for all staff” at the United States Consulate in Casablanca. RFQ No. 19M03025Q0022 at 1, 5. The solicitation provided that award would be made on a lowest-price, technically acceptable basis. *Id.* at 1. Change Agents submitted a quotation in response to the RFQ and, on September 30, State notified Change Agents that its quotation was not selected for award. Protest attach., “Bid and Post Award Emails.pdf” at 3-4.

On October 3, Change Agents requested a debriefing. *Id.* The agency did not provide a debriefing to Change Agents; however, on November 17, State notified Change Agents that the contract award and solicitation had been canceled due to a lack of funding. Protest attach., “Intent to Protest and Cancellation Emails.pdf” at 1. The agency stated that if “funding becomes available again and the requirement is reopened, we will make sure it is re-announced through [] SAM.gov.”¹ *Id.*

On November 24, Change Agents filed a protest with our Office, arguing in part that the award was improper because the agency had abandoned the RFQ’s lowest-priced, technically acceptable award criteria to award the contract to a higher priced firm based on a best-value tradeoff.² *Change Agents 360, supra* at 2. We dismissed these challenges to the agency’s award decision as academic based on the agency’s cancellation of the solicitation and contract. *Id.* at 2. Our decision explained that the “cancel[]ation of a solicitation renders a protest of the award of a contract under that solicitation academic.” *Id.* (citing *Ferris Optical*, B-403012.2, B-403012.3, Oct. 21, 2010, at 2). Change Agents separately contended that the agency improperly canceled the solicitation because the cancellation occurred in response to the protest. *Id.* at 3. Our Office found that the agency’s stated lack of funding provided a reasonable basis for cancellation. *Id.* (citing *James M. Carroll--Recon.*, B-221502.3, Mar. 24, 1986, at 3).

This request for reconsideration followed.

DISCUSSION

Change Agents requests reconsideration of our decision dismissing its protest and contends that the decision contained errors of fact. Req. for Recon. at 1-2. In this regard, the requester asserts that the agency has not canceled the contract award and therefore the agency’s actions did not meet our standard to dismiss Change Agents’s protest as academic. *Id.* The requester also argues that the agency improperly canceled the solicitation without a reasonable basis to avoid any resolution of the merits of the protest. *Id.* at 3-4. For the reasons discussed below, we find no basis to reconsider our decision.

Under our regulations, to obtain reconsideration, the requesting party must set out the factual and legal grounds upon which reversal or modification of the decision is deemed

¹ The System for Award Management (SAM), accessible at www.SAM.gov, is the current governmentwide point of entry (GPE) and serves as the single point where government business opportunities greater than \$25,000, including synopses of proposed contract actions, solicitations, and associated information, can be accessed electronically by the public. FAR 2.101.

² Change Agents’s protest also challenged the terms of the RFQ, however, we dismissed these protest grounds as untimely filed. *Change Agents 360, supra* at 1. Change Agents did not request reconsideration of this aspect of the decision

warranted, specifying any errors of law made or information not previously considered. 4 C.F.R. § 21.14(a). We will reverse a decision upon reconsideration only where the requesting party demonstrates that the decision contains a material error of law or fact. *AeroSage, LLC--Recon.*, B-417529.3, Oct. 4, 2019, at 2 n.2; *Department of Justice; Hope Village, Inc.--Recon.*, B-414342.5, B-414342.6, May 21, 2019, at 4. The repetition of arguments made during our consideration of the original protest and disagreement with our decision do not meet this standard. *Alion Sci. & Tech. Corp.--Recon.*, B-420778.3, Dec. 27, 2022, at 5-7.

First, the requester contends that our decision erred in dismissing the protest as academic based on the agency's representation that it would cancel the award. Req. for Recon. at 1-2. Change Agents argues that the SAM.gov records for the contract awarded to Oready do not reflect that the agency has actually canceled the contract. *Id.*

Change Agents has not provided a factual basis to reconsider our decision. As an initial matter, the SAM.gov posting for the award to Oready does not establish that the agency failed to cancel the award. While our Office charges firms with constructive notice of the contents of procurement actions posted to the GPE, it does not necessarily follow that the absence of information in the GPE means procurement actions have not occurred.³ See *ITility, LLC*, B-419167, Dec. 23, 2020, at 8 (finding that a firm did not have constructive notice of procurement actions taken by the agency that were not published on the GPE). Other than the lack of a SAM.gov update, the requester has not identified any indicia that the agency failed to terminate the award to Oready.

Further, subsequent to the filing of the request for reconsideration, the agency issued a new RFQ for change management training at the United States Consulate in Casablanca. B-424114.2 Electronic Protest Docketing System (Dkt.) No. 4, RFQ No. 19M03026Q0017. While not identical, both solicitations stated that they were for a "condensed change management training program . . . to support the Consulate's physical move from the Gauthier neighborhood to the New Consulate Compound in Casa Finance City in early 2026." Compare RFQ No. 19M03025Q0022 at 5, with RFQ No. 19M03026Q0017 at 5. The requester acknowledges that the new solicitation matches the "title, timing, and services" of both the canceled solicitation and the contract at issue. Dkt. No. 4; Amended Req. for Resolution, Feb. 25, 2026, at 1. On March 27, 2026, the agency awarded a new contract under the new solicitation to a different firm than Oready. Dkt. No. 8, Mar. 27 Contract Award.⁴ The requester does

³ To the extent the requester's arguments are meant to challenge the agency's failure to update a terminated contract's information in SAM.gov, we view such arguments as a matter of contract administration, which our Office will not review. 4 C.F.R. § 21.5(a).

⁴ The requester describes the new contract award as "resultant of the protested contract award." Dkt. No. 8. We informed Change Agents that if it objects to the new contract award, it could file a protest in accordance with our Bid Protest Regulations. *Id.* 4 C.F.R. part 21.

not explain why the agency would maintain its initial award then resolicit the same requirement and make award to a new contractor.

On this record, we see no basis to conclude that State failed to terminate the contract awarded to Oready under RFQ No. 19M03025Q0022. Beyond the absence of a SAM.gov update, the requester does not point to any information that demonstrates Oready is performing the contract or that the agency otherwise has not canceled the award along with the solicitation.⁵ Without more, the requester's disagreement with our reliance on the agency's representations does not provide a basis for reconsideration. *Alion Sci. & Tech. Corp.--Recon.*, *supra* at 7.

Second, Change Agents argues that the agency lacked a reasonable basis for canceling the solicitation. *Req. for Recon.* at 2-3. The requester maintains that the timing of the cancellation suggests it was done solely to avoid the protest. *Id.* at 3. Change Agents specifically contends that the agency's stated rationale for cancellation--a lack of funding--is belied by SAM.gov records that show funding still obligated to the solicitation. *Id.* at 2-3.

We note that the requester raised these same general arguments during the underlying protest. *Compare* *Req. for Recon.* at 2-4 *with* *Protest* at 6. Our Office specifically considered these arguments and concluded that Change Agents had not demonstrated that the cancellation was for any reason other than the unavailability of funds, which we concluded was a reasonable basis for cancellation. *Change Agents 360, LLC*, *supra* at 3. Neither the requester's repetition of its previous arguments, nor its disagreement with our conclusion, provides a basis for reconsideration, and we therefore dismiss these arguments. *Alion Sci. & Tech. Corp.--Recon.*, *supra*.

To the extent Change Agents argues that our decision erred in relying on the agency's representations regarding the lack of funds because the agency has not recorded any de-obligation of the contract funding on SAM.gov, we note, as above, that the absence of information in the GPE does not demonstrate that procurement or funding actions have not taken place. In any event, our Office generally does not question an agency's representations concerning the availability of funds, or require an agency to provide detailed information concerning its budget. *Vinculum Sols., Inc.--Recon*, B-408337.3, Dec. 3, 2013, at 4. In this regard, the management of an agency's funds generally depends on the agency's judgement concerning which projects and activities should receive increased or reduced funding and a contracting agency has the right to cancel a solicitation when, as a result of its allocation determinations, sufficient funds are not available. *Id.* We conclude that no material error has been shown. The requester's disagreement with our conclusions does not provide a basis for reconsideration. *Alion Sci. & Tech. Corp.--Recon.*, *supra*.

⁵ The requester acknowledges that the agency canceled RFQ No. 19M03025Q0022. *Req. for Recon.* at 1; see also *Change Management Training for Consulate Staff*, <https://sam.gov/workspace/contract/opp/17a166756363440789bf5e49a3f7237d/view> (last visited April 3, 2026).

The request is denied.

Edda Emmanuelli Perez
General Counsel