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Decision

Matter of: Strategic Alliance Business Group, LLC

File: B-423306.19

Date: July 2, 2026

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DIGEST

Protest is denied where agency reasonably eliminated protester’s proposal from award consideration because the proposal failed to include information required by solicitation.

DECISION

Strategic Alliance Business Group, LLC, a small business of Fairfax, Virginia, protests the elimination of its proposal from the competition under request for proposals (RFP) No. 80TECH24R0001, issued by the National Aeronautics and Space Administration (NASA), for information technology (IT) products, cloud solutions, cybersecurity, and related services. The protester contends that the agency unreasonably eliminated its proposal from the competition.

We deny the protest.

BACKGROUND

NASA issued the solicitation on May 23, 2024, in accordance with Federal Acquisition Regulation (FAR) part 15, seeking to award the sixth generation of the solutions for enterprise-wide procurement (SEWP VI) government-wide acquisition contract vehicle

for IT products and services.¹ The solicitation will result in multiple government-wide indefinite-delivery, indefinite-quantity contracts under which fixed-price, time-and-materials, labor-hour, fixed-price award fee, fixed-price incentive fee, and fixed-price economic price adjustment task orders can be issued. RFP at 40. The solicitation contemplates awarding contracts without discussions to all qualifying offerors for an ordering period of 10 years. *Id.* at 40, 117. The maximum ordering value is \$20 billion. *Id.* at 44.

The solicitation advised that contracts will be awarded for three categories;² each category is self-contained with its own separate fulfillment requirements, proposal submission requirements, and evaluation criteria. *Id.* at 25-39. This protest concerns category B, enterprise-wide ITC/AV service solutions, and category C, ITC/AV mission-based services. Protest at 8. The due date for receipt of category B and C proposals was February 24, 2025. COS at 2.

NASA is conducting this procurement in three phases. RFP at 117. Upon the completion of each phase of the evaluation, the agency will notify the offeror whether its proposal was selected to proceed to the next phase or eliminated from the competition. *Id.* at 118. Offerors were required to submit their proposals in the following three volumes: offer volume, past performance volume, and mission suitability volume. *Id.* at 96. As relevant here, the mission suitability volume, which was evaluated during phase three, consisted of the technical approach subfactor and the management approach subfactor.³ *Id.* at 114-115.

Pertinent to this protest, for the management approach subfactor, offerors were to provide a narrative describing their corporate processes and resources regarding the corporate risks associated with cybersecurity supply chain risk management (C-SCRM) and IT security of contractor acquired property. *Id.* at 115. In the narrative, offerors also were to provide information related to how the offeror is participating in SCRM and/or IT security activities, or at a minimum provide details regarding how the offeror is kept abreast of and is addressing key SCRM and/or IT security practices. *Id.*

¹ The solicitation was amended 14 times and citations to the RFP are to the conformed version in amendment 14. Contracting Officer's Statement (COS) at 1; Agency Report (AR), Tab 1, Exh. 15A, RFP amend. 14. Citations to the record use the Adobe PDF pagination of the documents produced.

² SEWP VI consists of three categories of IT services: (1) category A, IT, communication, and audio visual (ITC/AV) solutions; (2) category B, enterprise-wide ITC/AV service solutions; and (3) category C, ITC/AV mission-based services. RFP at 25-39.

³ For the technical approach subfactor, the RFP provided that offerors were to describe the technical scalability and extensibility of their proposed products, solution, and services, as well as how the offeror's IT communication/AV-based services would provide technological leadership to current and future requirements. *Id.* at 114.

Additionally, the solicitation specified that offerors “shall either fill out . . . [a] C-SCRM [a]ttestation [f]orm,” attached as exhibit 5 to the RFP, or “provide a copy of a valid active [o]pen [t]rusted [t]echnology [p]rovider™ [s]tandard (O-TTPS) [c]ertification to attest to meeting the ISO 20243 standard.” *Id.*

As relevant here, the solicitation provided that the agency would evaluate the management approach subfactor of the mission suitability factor to assess the offeror’s understanding and demonstration of its ability to successfully perform the management requirements as specified in the RFP. *Id.* at 123. The RFP provided that the agency would evaluate proposals under the mission suitability factor and subfactors on a pass/fail basis, with proposals receiving a rating of either satisfactory confidence or no confidence. *Id.* The solicitation specified that an offeror must receive an overall confidence rating of satisfactory under the mission suitability factor to receive an award, RFP at 117, and explained that “[r]eceiving a ‘[n]o [c]onfidence’ rating in either [m]ission [s]uitability subfactors ([t]echnical [a]pproach or [m]anagement [a]pproach) . . . will result in a ‘[n]o [c]onfidence’ rating” and that the offeror “must receive a rating of ‘[s]atisfactory [c]onfidence’ in both subfactors to have an overall [m]ission [s]uitability [r]ating of ‘[s]atisfactory [c]onfidence.’” *Id.* at 123. The RFP also provided that “[o]fferors must respond to all factors, sub-factors, and points of the [m]ission [s]uitability [v]olume” and that a “non-response by an [o]fferor to any part of this [s]ection will result in the [o]fferor being no longer eligible for award.” RFP at 114. In addition, the solicitation provided that any proposal that deviated from, or took exception to, any of the instructions of the solicitation would be eliminated from the competition. *Id.* at 117.

Strategic timely submitted two proposals, one for category B and one for category C. COS at 6. In evaluating both of Strategic’s proposals, the agency noted that the submissions failed to include either the C-SCRM attestation form or a copy of an O-TTPS certification. AR, Tab 22, Category B Down-Select Notice at 1-2; AR, Tab 23, Category C Down-Select Notice at 1-2. The agency explained that, given Strategic’s failure to submit either the C-SCRM attestation form or the O-TTPS certification, it assigned both of Strategic’s proposals ratings of no confidence. AR, Tab 22, Category B Down-Select Notice at 1-2; AR, Tab 23, Category C Down-Select Notice at 1-2. Because the solicitation required proposals to receive a rating of satisfactory confidence to be eligible for award, RFP at 117, the agency eliminated Strategic’s proposals from the competition. AR, Tab 22, Category B Down-Select Notice at 2; AR, Tab 23, Category C Down-Select Notice at 2.

The agency informed Strategic of the elimination of its proposals from categories B and C on March 20, 2026, and stated that the notice constituted the agency’s written debriefing in accordance with FAR part 15. AR, Tab 22, Category B Down-Select Notice at 1; AR, Tab 23, Category C Down-Select Notice at 1. This protest followed.

DISCUSSION

Strategic contends that the agency’s decision to eliminate its proposals from the competition due to its failure to submit either a C-SCRM attestation form or provide a

copy of an O-TTPS certification under the management approach subfactor was unreasonable because other areas of its proposals sufficiently demonstrated its C-SCRM capability. Protest at 8-11. Strategic also argues that the agency's decision not to seek clarifications regarding the missing C-SCRM attestation form and O-TTPS certification was unreasonable. *Id.* at 11. For reasons discussed below, we find no merit to the protester's arguments and deny the protest.⁴

Agency's Evaluation

In reviewing a protest challenging an agency's evaluation, our Office will not reevaluate proposals or substitute our judgment for that of the agency, as the evaluation of proposals is a matter within the agency's discretion. See *SDS Int'l, Inc.*, B-291183.4, B-291183.5, Apr. 28, 2003, at 5-6. Rather, we will review the record to determine whether the agency's evaluation was reasonable and consistent with the stated evaluation criteria and applicable procurement statutes and regulations. *MVM, Inc.*, B-407779, B-407779.2, Feb. 21, 2013, at 6. In a negotiated procurement, a proposal that fails to conform to the material terms and conditions of the solicitation is considered unacceptable and may not form the basis for award. *Wolverine Servs. LLC*, B-409906.3, B-409906.5, Oct. 14, 2014, at 3-4. An offeror bears the burden of submitting an adequately written proposal that contains all the information required under a solicitation. *Business Integra, Inc.*, B-407273.22, Feb. 27, 2014, at 3. Where a proposal omits, inadequately addresses, or fails to clearly convey required information, the offeror runs the risk of an adverse agency evaluation. *Distributed Sols., Inc.*, B-416394, Aug. 13, 2018, at 4. A protester's disagreement with the agency's judgment, without more, is insufficient to establish that an evaluation was unreasonable. *MVM, Inc.*, *supra* at 5.

Based on our review of the record, we find nothing unreasonable regarding the agency's evaluation of the protester's proposal as failing to meet the RFP requirement to provide either the C-SCRM attestation form or O-TTPS certification. As noted above, the solicitation required offerors to submit either a C-SCRM attestation form or a copy of an O-TTPS certification to attest to meeting the ISO 20243 standard. RFP at 117. The solicitation also specified that any proposal that did not meet all of the solicitation requirements or that deviated from, or took exception to, any of the instructions of the solicitation would not be eligible for award and removed from the competition. *Id.* at 118-19; see also *id.* at 114 ("Offerors must respond to all factors, sub-factors, and points of the [m]ission [s]uitability [v]olume. A "non-response by an [o]fferor to any part of this [s]ection will result in the [o]fferor being no longer eligible for award.").

⁴ Although we do not address every argument raised by the protester, we have considered all of them and find that none provide a basis upon which to sustain the protest.

There is no dispute that Strategic's proposals failed to include the C-SCRM attestation form or a copy of an O-TTPS certification.⁵ While the protester asserts that NASA should have been able to ascertain its C-SCRM capability based on information in the management approach narrative of its proposal, as the agency notes, the protester has failed to provide any explanation as to how its management approach narrative addressed any of the information required by the C-SCRM attestation form, which requested that offerors attest to fifteen specific substantive items concerning SCRM and IT security.⁶ MOL at 8-9, *citing* Resp. to Dismissal Req. at 4 (asserting that although Strategic "does not explicitly allege in the body of its protest how [the] passages [of its narrative] address its commitment to supply chain management and IT security," it "need not do so, [because] the passages themselves are a part of the protest, and are self-explanatory.").

As the contracting officer explains in response to the protest, "Strategic's [m]anagement [a]pproach provided a discussion of their corporate processes as required by [the RFP], but did not satisfy the requirements [] requiring an attestation that the fifteen specific C-SCRM controls listed in Exhibit 5 are being met." COS at 7. As referenced above, an offeror bears the burden of submitting an adequately written proposal that contains all of the information required under a solicitation. *Business Integra, Inc., supra* at 3. Here, the RFP expressly required offerors' to provide either a C-SCRM attestation form or a copy of an O-TTPS certification, and Strategic's proposals included neither. In addition, the protester has failed to demonstrate that its proposals otherwise included information sufficient to establish that it met the solicitation requirements. Without such information, the agency reasonably assessed Strategic's proposals with a rating of no confidence under the mission suitability factor, and as a result, properly eliminated the proposals from the competition. Accordingly, we find nothing improper regarding the agency's evaluation. This protest ground is denied.

Clarifications

Strategic argues that the agency should have sought clarifications regarding Strategic's failure to include the C-SCRM attestation form. Protest at 11. In this regard, Strategic maintains that the agency abused its discretion by failing to conduct clarifications because, according to the protester, the omission of the C-SCRM attestation form was a minor clerical error that "falls squarely within the category of issues" that an agency could address by clarifications. *Id.* The agency disagrees that the omission of the

⁵ While the protester's proposal stated that it was submitting the C-SCRM attestation form, the protester acknowledges that it inadvertently failed to do so. Protest at 7.

⁶ For example, the form asked offerors to respond to questions, such as: "Does your organization control information posted or processed on publicly accessible information systems?" or "Does your organization authenticate (or verify) the identities of those users, processes, or devices, as a prerequisite to allowing access to organizational information systems?" See Protest, Exh. 7, C-SCRM Attestation Form.

C-SCRM attestation form was merely a clerical error. MOL at 10. Instead, the agency argues that allowing Strategic to revise its proposals to provide the missing C-SCRM form would have constituted a material revision, thereby constituting discussions. *Id.* at 10-11. For the reasons discussed below, we find nothing unreasonable regarding the agency's decision not to seek clarifications from Strategic.

The provisions at FAR section 15.306 describe a spectrum of exchanges that may take place between a contracting agency and an offeror during a negotiated procurement. Clarifications are limited exchanges between the government and offerors that may occur when award without discussions is contemplated; an agency may, but is not required to, engage in clarifications that give offerors an opportunity to clarify certain aspects of proposals or to resolve minor or clerical errors. FAR 15.306; *Satellite Servs., Inc.*, B-295866, B-295866.2, Apr. 20, 2005, at 2-3 n.2. Clarifications, however, cannot be used to cure proposal deficiencies or material omissions, materially alter the technical or cost elements of a proposal, or otherwise revise the proposal. *CJW-Desbuild JV, LLC*, B-414219, Mar. 17, 2017, at 3. In contrast, discussions occur when an agency communicates with an offeror for the purpose of obtaining information essential to determine the acceptability of a proposal or provides the offeror with an opportunity to revise or modify its proposal in some material respect. *ADNET Sys., Inc. et al.*, B-408685.3 *et al.*, June 9, 2014, at 16.

Here, Strategic failed to provide information that was expressly required by the solicitation and necessary to for the agency to evaluate whether its proposal met C-SCRM guidelines. To the extent the agency could have resolved the matter through clarifications as the protester contends, it was not required to do so. As we have explained, agencies have broad discretion as to whether to seek clarifications from offerors, and offerors have no right to clarifications regarding proposals. *J&J Contractors, Inc.*, B-421370, Mar. 30, 2023, at 11-12. Accordingly, Strategic has not established that the agency's actions were improper.

The protest is denied.

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General Counsel