U.S. GOVERNMENT ACCOUNTABILITY OFFICE

441 G St. N.W.
Washington, DC 20548

Comptroller General
of the United States

Decision

Matter of: Absolute Strategic Technologies, LLC

File: B-424321.2; B-424321.3

Date: June 18, 2026

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Col. Justin A. Silverman, Michael J. Farr, Esq., Matney E. Rolfe, Esq., Geoffrey R. Townsend, Esq., Lindsey A. Rasmussen, Esq., and Erika Whelan Retta, Esq., Department of the Air Force, for the agency.
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DIGEST

1. Protest challenging agency's evaluation of protester's proposal under the technical subfactors is denied where the evaluation was reasonable and consistent with the terms of the solicitation.

2. Protest that agency was required to perform a price realism evaluation fails to state a valid basis for protest where solicitation made no reference to price realism and did not advise offerors that their proposals could be rejected for offering prices that were too low.

3. Protest challenging various aspects of agency's evaluation of awardee's proposal is denied where the agency reasonably evaluated awardee's proposed costs as realistic; reasonably evaluated awardee's technical proposal as outstanding under the staffing approach evaluation subfactor; and did not treat offerors unequally.

4. Protest is denied where agency's best value determination was based on the agency's reasonable consideration of the relative merits and costs/prices of the competing proposals.

DECISION

Absolute Strategic Technologies, LLC (AST), of Southlake, Texas, protests the Department of the Air Force's issuance of a task order to Concept Plus, LLC (CPL), of Fairfax, Virginia, pursuant to fair opportunity proposal request (FOPR) No. FA8770-25-R-B006, to provide support services for the Air Force's "Reliability and Maintainability Information System" (REMIS). Protest at 3-19.[1] AST protests that the agency improperly evaluated AST's and CPL's proposals and failed to perform a reasonable best-value tradeoff.

We deny the protest in part and dismiss it in part.

BACKGROUND

In March 2025, pursuant to section 16.505 of the Federal Acquisition Regulation (FAR), the agency issued the solicitation to contractors holding indefinite-delivery, indefinite-quantity (IDIQ) contracts under the Small Business Enterprise Applications Solutions (SBEAS) program; the solicitation sought proposals to provide various support services for REMIS.[2] The solicitation's SOO included section 3.1, titled "Operations Support," and section 3.2, titled "Agile Capability Support," which reflected virtually all of the work contemplated by the solicitation.[3] In this context, each offeror was required to draft and submit a portion of the solicitation's performance work statement (PWS), describing its approach to meeting the specific requirements identified in SOO sections 3.1 and 3.2. *See* AR, Tab 3e, PWS at 4.

The solicitation provided that issuance of the task order would be based on a best-value tradeoff between technical and cost/price evaluation factors,[4] and established three

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[1] The page numbers referenced in this decision are the Adobe PDF page numbers in the documents submitted.

[2] The agency describes REMIS as "a web-based data system for collecting, validating, editing, processing, integrating, standardizing and reporting equipment maintenance data," and states that it is "the system of record for organizational, intermediate, and depot level operational and authoritative information for all USAF [United States Air Force] weapon systems." Agency Report (AR), Tab 3f, Statement of Objectives (SOO) at 1.

[3] By way of an overview, section 3.1 of the SOO requires the contractor to "maintain operation of the REMIS system"; section 3.2 of the SOO requires the contractor to "implement[] new capability and software corrections," which "will include all aspects of the software development process." *See* AR, Tab 3d, Instructions to Offerors at 6; AR, Tab 3f, SOO at 2.

[4] The solicitation provided that the technical factor was significantly more important than cost/price. AR, Tab 3d, Instructions to Offerors at 9.

equally weighted technical subfactors: operations support;[5] agile capability support;[6] and staffing approach.[7] AR, Tab 3d, Instructions to Offerors at 6. The solicitation provided that technical proposals would be assigned ratings of unacceptable, acceptable, or outstanding under each of the technical subfactors based on the degree to which the proposal addressed, and demonstrated an understanding of, the SOO requirements. *Id.* at 9-11. Finally, the solicitation provided that, to obtain a rating of outstanding, a proposal must "contain[] at least one strength," and defined a strength 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.* at 10-11.

With regard to cost/price, the solicitation contained four contract line item numbers (CLINs) for each performance period[8] for which offerors were required to submit proposed costs/prices.[9] Specifically, CLINs 0001 and 0004 reflect operational support and data requirements and were designated as "FFP" CLINs, that is, firm-fixed-price.[10] AR, Tab 3c, Pricing Template. In contrast, CLINs 0002 and 0003 reflect agile capability support requirements and were designated as "CPFF-LOE" CLINs, that is, cost-plus-fixed-fee--level of effort.[11] *Id.* With regard to offerors' cost/price proposal submissions,

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[5] Under this technical subfactor, the solicitation provided that the agency would assess the degree to which a proposal addressed, and demonstrated understanding of, the objectives identified in SOO section 3.1, titled "Operations Support." *Id.* at 9-10.

[6] Under this technical subfactor, the solicitation provided that the agency would assess the degree to which a proposal addressed, and demonstrated understanding of, the objectives identified in SOO section 3.2, titled "Agile Capability Support." *Id.*

[7] Under this technical subfactor, offerors were permitted to propose varying labor categories and levels of effort, and the solicitation provided that the agency would assess the extent to which the proposal demonstrated a thorough approach and an understanding of the staffing required to perform the task order requirements. *Id.* at 11.

[8] The solicitation contemplated a 12-month base performance period and four 12-month option periods. AR, Tab 3d, Instructions to Offerors at 3.

[9] The solicitation also contained CLINs for other direct costs and travel, but provided values for these CLINs that would be used in evaluating each offeror's proposal and offerors were directed not to change those values. AR, Tab 3c, Pricing Template.

[10] The agency explains that "firm-fixed price is suitable for the operational support for REMIS, as the requirement is well-defined, is not complex, and is low risk." AR, Tab 12, Fair Opportunity Decision Document (FODD) at 2.

[11] The agency explains that CPFF-LOE CLINs were used for these agile capability support requirements due to "frequent release of capability," noting that "[e]ach release shall include requirement analysis, design, configuration or coding, testing, quality assurance, training (as applicable), and documentation." *Id.*

the solicitation reminded offerors that "[t]his effort will have CPFF-LOE CLINs, so a Cost Realism analysis will need to be accomplished," and required offerors to submit a breakdown of the costs they proposed under the CPFF CLINs; no price breakdown was required for the FFP CLINs. AR, Tab 3d, Instructions to Offerors at 7-8.

With regard to evaluation under the cost/price factor, the solicitation stated:

> Cost/Price proposals will support the proposed technical approach and will be evaluated for (1) Completeness, (2) Unbalanced pricing, (3) Total Evaluated Price (TEP), (4) Cost realism,[12] and (5) Reasonableness. Offerors whose price is determined to be incomplete or unreasonable will not be considered for award. A price that is determined to be unbalanced will not be considered for award if the PCO [procurement contracting officer] determines that the lack of balance poses an unacceptable risk to the Government. If a proposal is determined to lack cost realism, it may not be considered for award. If the PCO determines that the lack of cost realism poses an unacceptable risk to the Government, that proposal will not be eligible.

Id. at 11.

On or before May 1, 2025, proposals were submitted by eight offerors, including AST and CPL.[13] Overall, the two proposals were rated as follows:

	Operations Support	Agile Capability Support	Staffing Approach	Cost/Price
AST	Acceptable	Acceptable	Outstanding	$62.5 million
CPL	Acceptable	Acceptable	Outstanding	$54.4 million

AR, Tab 12, FODD at 12.

In evaluating AST's and CPL's proposals under the first two technical subfactors--operations support and agile capability support---the agency concluded that both proposals met the solicitation requirements, but did not reflect proposed approaches that exceeded the requirements in a way advantageous to the agency; accordingly, no strengths were assessed in either offeror's proposals under these subfactors and both proposals were assigned ratings of acceptable under these subfactors. *Id.* at 12-13.

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[12] The solicitation noted that "Cost Realism analysis is the process of independently reviewing and evaluating specific elements of each offeror's proposed cost estimate." AR, Tab 3d, Instructions to Offerors at 12.

[13] The other offerors' proposals, and the agency's evaluation thereof, are not relevant to this protest and are not further discussed.

In evaluating AST's proposal under the third technical subfactor, staffing approach, the agency noted that a significant portion of AST's proposed staffing was comprised of very senior personnel, stating: "AST's combined SME [subject matter expert]/Senior labor category experience levels for Operations Support and the Capability Support Agile development teams is [redacted]." *Id.* at 13. Accordingly, the agency assessed a strength in AST's staffing approach and assigned a rating of outstanding under the staffing approach subfactor. *Id.*

In evaluating CPL's proposal under the staffing approach subfactor, the agency noted that, in addition to "a thorough staffing approach," CPL offered a "Platform/Tech[nical] Debt Team," with a "heavy emphasis on addressing technical debt."[14] AR, Tab 10, CPL Technical Evaluation Report at 4; AR, Tab 12, FODD at 13. The agency further noted that "[t]his team will be staffed with a dedicated [redacted] whose function will be to look at [redacted] affecting REMIS," which will [redacted]. AR, Tab 12, FODD at 13. The agency concluded that "having dedicated technical debt focused resources" constituted a strength in CPL's proposal, and assigned the proposal a rating of outstanding under the staffing approach subfactor. *Id.*

In evaluating proposals under the cost/price factor, the agency evaluated each proposal for completeness, unbalanced pricing, total evaluated price, cost realism for the CPFF-LOE CLINs, and reasonableness, concluding that both proposals "satisfied the Cost/Price criteria." *Id.* at 13.

Thereafter, the source selection authority performed a comparative analysis of AST's and CPL's proposals and concluded that "[CPL's] total evaluated price of $54.4 million is justified in that the Government found the performance stated in their proposal plus their approach to addressing technical debt was the best value to the Government" and "outweighed the higher cost" of AST's proposal. *Id.* at 14. Accordingly, the agency selected CPL for award.

On March 2, 2026, the agency notified AST of its source selection decision. After a debriefing, this protest followed.[15]

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[14] The agency defines "technical debt" as "deferred maintenance of, or delayed updates to Code, Architecture, Hardware, Software, Operating System, or DBMS [database management system]," and notes that Congress has discussed "technical debt" in the context of "software intensive systems," defining that term as "an element of design or implementation that is expedient in the short term, but that would result in a technical context that can make a future change costlier or impossible." Resp. to GAO Req. for Definition at 1; *see* National Defense Authorization Act for Fiscal Year 2022, Pub. L. No. 117-81, § 835, 135 Stat. 1541, 1836-37 (2021).

[15] The task order has an expected value exceeding $35 million and is therefore within our jurisdiction to review protests related to the issuance of orders under multiple-award

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DISCUSSION

In its protest,[16] AST asserts that the agency unreasonably evaluated AST's technical proposal by failing to assess additional strengths. AST also challenges various aspects of the agency's evaluation of CPL's proposal; asserts that the agency engaged in unequal treatment of the offerors; and maintains that the agency failed to perform a reasonable best-value tradeoff analysis. As discussed below, we find no basis to sustain any of AST's protest allegations.

Evaluation of AST's Proposal

First, AST complains that the agency "failed to credit AST with numerous strengths" under the technical factor, operations support and agile capability support subfactors. Protest at 10-14. In this context, AST asserts that, because its team "includes the incumbent contractor, [redacted],[17] who has extensive and detailed knowledge regarding the REMIS technical requirements" and "significant experience leveraging Agile methodologies," AST's proposal was entitled to strength assessments "due to its subcontractor's incumbency." *Id.* at 11-14. In addition to strengths based on its subcontractor's "extensive" knowledge and "significant" experience, AST asserts that its proposal should have received strength assessments for proposing to "integrate[] automation and future-ready solutions" and "employ[] a Human-Centered Design approach that actively engages stakeholders and end users throughout the development process." *Id.* at 12-13.

The agency first responds that the solicitation's evaluation criteria did not provide for evaluation of either experience or incumbency under the operations support and agile capability support subfactors. Contracting Officer's Statement (COS) at 18-24; AR, Tab 18, Decl. of Technical Lead at 7-15.[18] Accordingly, it would have been improper to

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IDIQ contracts issued under the authority of title 10 of the United States Code. 10 U.S.C. § 3406(f)(1)(B).

[16] AST filed its initial protest on March 17 and, following receipt of the agency's report responding to that protest, filed a supplemental protest on April 27. Our decision here responds to the allegations raised in both the initial and supplemental protests.

[17] AST states that [redacted] is "a subcontractor for this effort." AR, Tab 5, AST Technical Proposal at 6.

[18] AST asserts that GAO should give "little, if any, weight" to the technical lead's post-protest declaration. Comments and Supp. Protest at 6. However, we have repeatedly stated that an agency's contemporaneous evaluation record is not required to explain why a proposal did not receive a strength, weakness, or deficiency for a particular item. *See, e.g.*, *Allied Tech. Grp., Inc.*, B-412434, B-412434.2, Feb. 10, 2016, at 13; *By Light Prof'l IT Servs., LLC,* B-417191.3, Dec. 4, 2019, at 4 n.5; *Building*
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assess strengths in AST's proposal based on these factors. With regard to AST's additional complaints, the agency notes that: the solicitation stated that offerors were expected to employ automation in their proposals, *see* AR, Tab 3f, SOO at 2-5; the agency currently utilizes the automation AST proposed; AST failed to provide details regarding its approach to integrate automation; and employing an approach that actively engages stakeholders and end users through the development process is "standard methodology." AR, Tab 18, Decl. of Technical Lead, at 7-15. In short, the agency maintains that nothing in AST's proposal warranted assessment of a strength under the operations support and agile capability support evaluation subfactors.

The evaluation of proposals in a task order competition conducted under FAR section 16.505, including the determination of the relative merits of proposals, is primarily a matter within the agency's discretion. *DirectViz Sols., LLC*, B-421598, B-421598.4, July 19, 2023, at 8; *Logistics Mgmt. Inst.*, B-417601 *et al.*, Aug. 30, 2019, at 4. In reviewing a protest of a task order competition, we do not reevaluate proposals but examine the record to determine whether the evaluation and source selection decision are reasonable and consistent with the solicitation's evaluation criteria and applicable procurement laws and regulations. *Gunnison Consulting Grp., Inc.*, B-418876 *et al.*, Oct. 5, 2020, at 10. A protester's disagreement with the agency's judgment, without more, is not sufficient to establish that the agency acted unreasonably. *Id.* Moreover, we have consistently stated that there is no requirement for an incumbent to be given extra credit for its status as an incumbent. *See*, *e.g.*, *FYI-For Your Info., Inc.*, B-423774, B-423774.2, Dec. 19, 2025, at 6; *Tuknik Gov't. Servs., LLC*, B-422862.2, Dec. 30, 2024, at 4; *Integral Consulting Servs., Inc.*, B-415292.2, B-415292.3, May 7, 2018, at 7.

Here, based on our review of the record, we reject AST's assertion that it was entitled to strength assessments under the operations support and agile capability support subfactors. As noted above, AST's reliance on the incumbent as a subcontractor does not form a basis for a strength assessment. Similarly, AST's various assertions regarding its subcontractor's experience and knowledge--without detailing specific enhancements flowing from such experience and knowledge--fails to establish that strength assessments were warranted. Finally, we find nothing unreasonable in the agency's determination that the general references in AST's proposal to automation and a "human-centered" approach did not warrant strength assessments. Accordingly, AST's protest challenging the agency's evaluation of its technical proposal is denied.

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Operations Support Servs., LLC, B-407711, B-407711.2, Jan. 28, 2013, at 5. Accordingly, we will consider an agency's post-protest declaration that explains the agency's basis for concluding an offeror's proposal met, but did not exceed the solicitation requirements in a manner advantageous to the agency.

Evaluation of CPL's Proposal

Next, AST challenges the agency's evaluation of CPL's proposal, complaining about various aspects of the cost/price and technical evaluations. Specifically, AST asserts that the agency: failed to perform a price realism evaluation of the FFP CLINs; unreasonably evaluated CPL's proposed costs under the CPFF-LOE CLINs; unreasonably assigned a rating of outstanding to CPL's technical proposal under the staffing approach subfactor; and engaged in unequal treatment of the offerors by assessing a strength in CPL's proposal for its approach to technical debt. As discussed in the representative examples below, AST's various assertions are without merit.

Price Realism

First, AST asserts that, in performing its cost/price evaluation, the agency improperly failed to perform a price realism analysis on the FFP CLINs. Comments and Supp. Protest at 9, 14-16. AST asserts that the solicitation's various references to "cost realism" effectively "committed" the agency to perform a price realism analysis.[19] *Id.* at 14.

The agency responds that the solicitation provided only for a realism analysis regarding the costs proposed under CPFF-LOE CLINs. Supp. Contracting Officer's Statement and Memorandum of Law (COS/MOL) at 3-9. In this context, the agency notes that the solicitation specifically stated that "[t]his effort will have CPFF-LOE CLINs, so a Cost Realism analysis will need to be accomplished for each vendor," and required offerors to submit cost data only for the CPFF-LOE CLINs. *See* AR, Tab 3d, Instructions to Offerors at 7-8. Further, the agency notes that the solicitation made no reference to a price realism analysis, and did not instruct offerors that their proposals would be rejected for offering prices that were too low. Supp. COS/MOL at 3-9. In short, the agency maintains that the terms of the solicitation did not contemplate performance of a price realism analysis.

While it is within an agency's discretion to provide for a price realism analysis in evaluating fixed-price proposals, *see* FAR 15.404-1(d)(3), offerors must be given reasonable notice that submission of low pricing may reflect negatively on the agency's assessment of their understanding of the contract requirements or the risk associated with their proposals. *Emergint Techs., Inc.*, B-407006, Oct. 18, 2012, at 5-6. In this context, absent a solicitation's express price realism provision, we will conclude that a solicitation contemplates a price realism evaluation only where: the solicitation expressly states that the agency will review prices to determine whether they are so low as to reflect a lack of technical understanding; and the solicitation states that a proposal can be rejected for offering low prices. *DynCorp Int'l LLC,* B-407762.3, June 7, 2013,

[19] Remarkably, the record indicates--and AST does not dispute--that AST's proposed prices under the FFP CLINs were *lower* than CPL's proposed prices under those CLINs. AST Resp. to GAO Req., May 27, 2026, at 1-3.

at 9. Further, where a solicitation does not meet these requirements, agencies are neither required nor permitted to conduct a price realism analysis in evaluating fixed-price proposals. *IBM U.S. Fed., a div. of IBM Corp.; Presidio Networked Sols., Inc.*, B-409806 *et al.*, Aug. 15, 2014, at 17.

Further, we note that our Bid Protest Regulations require that protests include a detailed statement of the legal and factual grounds of protest and that the grounds stated be legally sufficient. 4 C.F.R. § 21.1(c)(4), (f). This requirement contemplates that protesters will provide, at a minimum, credible allegations that are supported by evidence and are sufficient, if uncontradicted, to establish the likelihood of the protester's claim of improper agency action. *Warfighter Focused Logistics, Inc.*, B-423546, B-423546.2, Aug. 5, 2025, at 4.

Here, we reject AST's assertion that the solicitation contemplated a price realism analysis regarding the FFP CLINs. As noted above, the solicitation referred only to a "cost realism" analysis, made no reference to price realism, and expressly referenced the CPFF-LOE CLINs in stating that cost realism would be performed. Further, the solicitation required offerors to submit cost data only for the CPFF-LOE CLINs. Finally, the solicitation did not instruct offerors that the agency would review prices to determine whether they were so low as to reflect a lack of technical understanding, and that their proposals could be rejected for offering prices that were too low. On this record, AST's assertion that the agency was required to perform a price realism analysis regarding FFP CLINs, where no such analysis was required or permitted, does not state a valid basis of protest. Accordingly, this protest ground is dismissed.

Cost Realism

Next, AST protests that the costs CPL proposed for the CPFF-LOE CLINs were unrealistic. Protest at 14-16. More specifically, AST asserts that its own proposal reflected the "minimum" cost/price at which the task order could be successfully performed and, therefore, maintains that CPL's proposal reflected staffing levels and labor costs that were unrealistically low. *Id.*

The agency first responds that, in performing its cost realism analysis, it did not rely on the incumbent contractor's labor costs or levels of effort as benchmarks for its evaluation since the solicitation directed offerors to propose their own approaches to accomplishing the task order requirements. COS at 27-28; *see* AR, Tab 3d, Instructions to Offerors at 12. More specifically, in its cost realism analysis of CPL's proposed costs, the agency states that it applied CPL's proposed indirect rates to direct labor rates obtained from the Economic Research Institute (ERI) to calculate a government estimate of most probable cost (GEMPC), and then compared CPL's fully burdened rates to the GEMPC rates for the CPFF-LOE CLINs, leading to the following comparison:

	GEMPC	CPL Proposed Cost
CLIN 0002	$3,440,549	$3,285,224
CLIN 0003	$1,582,631	$1,483,320

AR, Tab 11, CPL Cost/Price Evaluation Report at 12-13.

Based on this comparison, the agency concluded that CPL's proposed labor rates were realistic. Additionally, the cost/price evaluation team consulted the technical evaluation team to determine whether the proposed levels of effort for each CLIN were realistic for the work to be performed, reflected a clear understanding of the requirements, and were consistent with CPL's methods of performance described in its technical proposal. *Id.* The technical team responded that: "The offeror's proposal met the objectives identified in SOO sections 3.1 and 3.2 and the proposed hours/FTEs[full-time equivalent]/experience levels provided in the cost proposal are consistent with the offeror's staffing approach." *Id.* at 13. Based on this analysis, the agency concluded that "the proposed offer is realistic." *Id.*

When an agency evaluates an offeror's proposal for cost realism, the proposed estimated costs are not dispositive, and the agency must determine the extent to which an offeror's proposed costs represent what the contract should cost, assuming reasonable economy and efficiency. *See*, *e.g.*, *ENSCO, Inc.*, B-414844.4 *et al.*, July 5, 2018, at 4-5. A cost realism analysis involves independently reviewing and evaluating specific elements of each offeror's cost estimate to determine whether the estimated proposed cost elements are realistic for the work to be performed, reflect a clear understanding of the requirements, and are consistent with the unique methods of performance and materials described in the offeror's proposal. FAR 15.404-1(d)(1); *Advanced Commc'n Sys., Inc.*, B-283650 *et al.*, Dec. 16, 1999, at 5. An agency's cost realism analysis need not achieve scientific certainty; rather, the methodology employed must be reasonably adequate and provide some measure of confidence that the level of effort and rates proposed are realistic. *See*, *e.g.*, *Highmark Medicare Servs., Inc., et al.*, B-401062.5 *et al.*, Oct. 29, 2010, at 23.

Here, our review of the record establishes that the agency considered the labor rates and staffing levels proposed by CPL, compared the proposed rates to the GEMPC it calculated based on ERI data, obtained input from the technical evaluation team, and--based on all such calculations, comparisons, and input--concluded that CPL's proposed costs under the CPFF-LOE CLINs were realistic. On this record, we find no basis to question the reasonableness of the agency's evaluation or its cost realism determination, and this protest ground is denied.

Technical Evaluation Under Staffing Approach Subfactor

Next, AST asserts that "it was impossible" for CPL to have merited a technical rating of outstanding under the staffing approach subfactor. Protest at 16. AST's assertion is, again, based on the proposition that AST's proposed staffing approach reflected the minimum staffing levels and labor costs that are necessary to successfully perform the contract. *Id.*

The agency responds that its evaluation of CPL's staffing approach did not reflect a comparison to AST's proposed approach; rather, its evaluation was based on the agency's review of CPL's proposed approach. In this regard, the agency notes that, in addition to offering "a thorough staffing approach to meet the [solicitation] requirements," CPL offered a "Platform/Tech[nical] Debt Team" with a "heavy emphasis on addressing technical debt." AR, Tab 10, CPL Technical Evaluation Report at 4; AR, Tab 12, FODD at 13. The agency further noted that "[t]his team will be staffed with a dedicated [redacted] whose function will be to look at [redacted] affecting REMIS," which will [redacted]. AR, Tab 12, FODD at 13. The agency concluded that "having dedicated technical debt focused resources" constituted a strength in CPL's proposal and, consistent with the solicitation's ratings definitions, assigned the proposal a rating of outstanding under the staffing approach subfactor. *Id.* In short, the agency responds that the strength assessed under the staffing approach subfactor reflected CPL's unique approach to addressing technical debt, along with having proposed a "thorough approach" to staffing. Accordingly, the agency maintains that it properly assigned a rating of outstanding to CPL's proposal under the staffing approach subfactor.

As noted above, the evaluation of proposals in a task order competition conducted under FAR section 16.505, including the determination of the relative merits of proposals, is primarily a matter within the agency's discretion. *DirectViz Sols., LLC*, *supra*; *Logistics Mgmt. Inst.*, *supra*. As also noted above, in reviewing a protest of a task order competition, we do not reevaluate proposals but limit our review to determining whether the evaluation and source selection decision were reasonable and in accord with the solicitation's evaluation criteria and applicable procurement laws and regulations. *Gunnison Consulting Grp., Inc.*, *supra*. A protester's disagreement with the agency's judgment, without more, is not sufficient to establish that the agency acted unreasonably. *Id.*

Here, we find no basis to question the agency's evaluation of CPL's proposal under the technical evaluation factor. First, AST's reliance on its own staffing approach as a benchmark for evaluation reflects a fundamental misunderstanding of the terms of the solicitation--which directed each offeror to propose its own approach to task order performance. Further, the solicitation provided that a rating of outstanding was appropriate under the staffing approach subfactor where a proposal demonstrated a thorough staffing approach and contained at least one strength. AR, Tab 3d, Instructions to Offerors at 11. CPL's proposal met those requirements. Accordingly, we find no merit in AST's protest challenging the agency's assignment of an outstanding rating to CPL's proposal under the staffing approach subfactor.

In a related argument, AST asserts that the assignment of a strength to CPL's proposal based on its approach to technical debt reflects disparate treatment because "AST proposed the same approach." Comments and Supp. Protest at 16. More specifically, AST asserts that its proposal "likewise provided for a separate team, primarily focused on reduction of technical debt." *Id.* at 17.

In response, the agency states: "[CPL's] and AST's proposed staffing approach[es] to addressing technical debt are not the same." Supp. COS/MOL at 10. Specifically, the agency explains that, while CPL proposed its technical debt team pursuant to performance of the operations support requirements--which will [redacted]--AST's proposal stated that one of its agile development teams will "concentrate[] on reducing technical debt and addressing other PMO [program management office]-defined priorities." *Id.* at 9-13; *see* AR, Tab 5, AST Technical Proposal at 18. The agency elaborates that CPL's approach of providing a "[redacted] technical debt team" ensures that "technical debt analysis does not need to compete with other Air Force/warfighter Agile Development Team priorities"; in contrast, AST's proposed approach "is not dedicated to technical debt and is dependent on PMO-defined backlog priorities." Supp. COS/MOL at 11. Accordingly, the agency concluded that CPL's proposal warranted a strength assessment, while AST's did not.

When a protester alleges disparate treatment in a technical evaluation, it must show that the differences in the evaluation did not stem from differences between the offerors' proposals. *See, e.g., Science Applications Int'l Corp.*, B-421660, B-421660.2, Aug. 8, 2023, at 11. Accordingly, 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 other proposals. *Id.*; *see also Cognosante MVH, LLC,* B-418986 *et al.*, Nov. 13, 2020, at 5.

Based on our review of the record here, it is clear that the agency determined that CPL's and AST's proposed approaches to technical debt were not the same. More specifically, in our view, the agency has provided a reasonable explanation as to why it did not view the two proposed approaches as "substantively indistinguishable" or "nearly identical." While AST disagrees with the agency's assessment, it has failed to demonstrate that the agency's judgment was unreasonable. Accordingly, AST's allegation of disparate treatment is denied.

Best-Value Tradeoff

Finally, AST asserts that the agency "performed an unreasonable tradeoff determination" because the determination was based on the alleged errors discussed above, and "because [the determination] focused solely on the adjectival ratings." Protest at 16-18.

Source selection officials have broad discretion in making a tradeoff between price and non-price factors, and the extent to which one may be sacrificed for the other is governed only by the tests of rationality and consistency with the solicitation's stated evaluation criteria. *DarkStar Intelligence, LLC*, B-423966, Jan. 26, 2026, at 5. Further, an agency's documentation supporting its tradeoff need only establish that the agency was aware of the relative merits and costs of the competing proposals and that the source selection decision was reasonably based. *Ironclad Tech. Servs., LLC*, B-419976.2, May 2, 2022, at 5.

Here, we reject AST's complaints regarding the best-value determination. First, as discussed above, we have considered and rejected AST's various complaints regarding alleged errors in the evaluation process. Accordingly, AST's challenge to the best-value award decision based on those alleged errors fails to state a basis for protest and is dismissed. *See*, *e.g.*, *DirectViz Sols., LLC,* B-417565.3, B-417565.4, Oct. 25, 2019, at 9.

With regard to AST's assertion that the best-value determination was based "solely on the adjectival ratings," the record is to the contrary. Rather, the FODD includes a detailed discussion regarding the evaluation of both CPL's and AST's proposals, specifically describing the basis for the strengths assessed to each. AR, Tab 12, FODD at 12-14. The FODD further contains a comparative analysis of the two proposals, culminating in the following:

> AST's total evaluated price of $62.5 million was not justified through their proposal, even in view of their evaluated strength. [CPL's] total evaluated price of $54.4 million is justified in that the Government found the performance stated in their proposal plus their approach to addressing technical debt was the best value to the Government, and worth their total evaluated price. [CPL's] overall technical approach outweighed the higher cost of AST's acceptable proposal.

Id. at 14.

On this record, AST's assertion that the best-value tradeoff determination was based solely on the adjectival ratings is without merit, and this protest ground is denied.

The protest is denied in part and dismissed in part.

Edda Emmanuelli Perez
General Counsel