U.S. GOVERNMENT ACCOUNTABILITY OFFICE

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

Comptroller General
of the United States

Decision

Matter of: Integrity Management Consulting, Inc.

File: B-424490

Date: August 13, 2026

Thomas K. David, Esq., Kenneth D. Brody, Esq., Lewis P. Rhodes, Esq., and Katherine A. David, Esq., Reston Law Group, LLP, for the protester.
Daniel J. Strouse, Esq., and Anna Dichter, Esq., Cordatis LLP, for ASET Partners Corporation, the intervenor.
Victoria R. Roth, Esq., and Peter G. Hartman, Esq., Department of Homeland Security, for the agency.
Janis R. Millete, Esq., and John Sorrenti, Esq., Office of the General Counsel, GAO, participated in the preparation of the decision.

DIGEST

1. Protest alleging the agency disparately evaluated the protester's and awardee's quotations under certain factors is dismissed as untimely where the information underpinning such arguments was previously available, and the protester failed to raise these arguments in a timely manner.

2. Protest that agency failed to assess additional strengths or the evaluation reflected disparate treatment is denied where the record shows that the evaluation was reasonable and consistent with the solicitation criteria.

3. Protest challenging agency's award decision is denied where the record reflects that the selection official reasonably found the quotations of the awardee and the protester to be relatively equal under the non-price factors and selected the lower-priced quotation for award.
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DECISION

Integrity Management Consulting, Inc., of McLean, Virginia, protests the issuance of a call order to ASET Partners Corporation, of Alexandria, Virginia, under request for quotations (RFQ) No. 70RTAC25Q00000042, issued by the Department of Homeland Security (DHS) for geospatial information and technology reservices. The protester argues that the agency unreasonably failed to assess additional strengths to the protester's quotation, disparately evaluated quotations, and conducted a flawed best-value decision.

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

BACKGROUND

On August 12, 2025, the agency issued the RFQ to holders of the DHS multiple-award geospatial technical support services 3.0 blanket purchase agreement (BPA), using the Federal Supply Schedule (FSS) procedures of Federal Acquisition Regulation (FAR) subpart 8.4. Memorandum of Law (MOL) at 1; *see* Agency Report (AR), Tab 11, RFQ at 1.[1] The solicitation contemplated the issuance of a hybrid fixed-price and time and material call order for "comprehensive geospatial enterprise technical expertise and contractor support services" for a base year period and a one-year option period. AR, Tab 10, RFQ, Statement of Work (SOW) at 7; *see* MOL at 1.

The RFQ contemplated that award would be made to the vendor whose quotation represented the best value, and further advised that the agency may award to "other than the highest technically rated quotation or other than the lowest-priced vendor." RFQ at 41. The RFQ established the following evaluation factors: (1) technical approach; (2) management and staffing plan; (3) experience; and (4) price. *Id.* at 39. Technical approach was the most important factor, with the management and staffing plan and experience factors considered equal but less important than technical approach. The non-price factors, when combined, were significantly more important than price for the purpose of the best-value tradeoff decision. *Id.*

The RFQ advised that for each non-price factor, DHS would assess a confidence rating. Each non-price factor received a rating of no confidence, some confidence, or high confidence based on the vendor's understanding of the requirement, whether the quotation provides sufficient information, and how successful the vendor would perform the call order requirements. AR, Tab 19, Technical Evaluation Report at 1-8. With respect to the price factor, vendors were required to provide a price schedule with their proposed labor category mix and labor rates (or any labor rate discounts) from their FSS contracts. *See* RFQ at 38-39*; see also* AR, Tab 33, RFQ, Schedule of Prices. Price was to be evaluated in accordance with FAR 8.405-2(d) to consider the level of effort and proposed labor category mix to determine price reasonableness. *Id.* at 40. Furthermore, the RFQ advised that the total evaluated price, which consisted of the base year, option year, and the six-month extension authorized by FAR 52.217-8, would be evaluated for reasonableness. *See id.*

The agency initially issued the call order to Integrity on September 29, 2025, and ASET filed a bid protest at the U.S. Court of Federal Claims (COFC) challenging the award on October 13, 2025. MOL at 4-5. In response to that protest, the agency took corrective action, amended the solicitation, and sought revised quotations. *Id.* at 2, 4-5.

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[1] All citations are to the Adobe PDF page numbers.

Specifically, the agency amended the solicitation with regard to the price factor and the management and staffing plan factor. *Id.* at 4-5; AR, Tab 25, RFQ amend. 2 at 1-2. The amended solicitation gave vendors the opportunity to submit revisions to their price quotations and technical quotations under the management and staffing plan factor. AR, Tab 25, RFQ amend. 2 at 1. The agency would evaluate only the information contained in the revised parts of the quotations; no other parts of the quotation would be reevaluated. *See* AR, Tab 31, Evaluation Plan Addendum at 2. Revised price quotations would also be reevaluated for reasonableness and, if necessary, for price realism. *Id.* at 3.

DHS received revised quotations from three of the BPA vendors, including Integrity and ASET. MOL at 3-4. After exchanges, the technical evaluation team (TET) provided the final evaluation:

	Integrity	**ASET**
Technical Approach	High Confidence	High Confidence
Management and Staffing Plan	High Confidence	High Confidence
Experience	High Confidence	High Confidence
Price[2]	$19,903,560.13	$19,868,757.39

AR, Tab 46, Best-Value Recommendation Memorandum at 4, 6-8. The selection official concurred with the TET's recommendation and concluded that both quotations were technically equal under the non-price factors. AR, Tab 47, Award Decision Memorandum at 1. Accordingly, the selection official concluded that ASET's lower-priced quotation represented the best value. *Id.* This protest followed.

DISCUSSION

Integrity argues that the agency disparately evaluated quotations and otherwise failed to assess additional strengths to Integrity's quotation. Comments at 8-18. Furthermore, Integrity alleges that DHS' best-value determination was flawed because the selection official failed to look behind the adjectival ratings to consider the underlying merits of the quotations and instead improperly adopted verbatim the conclusions of the technical evaluation team and the contracting officer. Protest at 14-19; Comments at 6-18. Although we do not address every argument made by Integrity, we have considered them all and conclude that none provides a basis to sustain the protest.[3]

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[2] Integrity's quoted price was $16,003,355.40, and ASET's quoted price was $15,994,138.80. AR, Tab 46, Best-Value Recommendation Memorandum at 6-7. As noted, the agency evaluated for reasonableness the total evaluated price, which consisted of the base year, option year, and the six-month extension authorized by FAR 52.217-8. *See* RFQ at 40.

[3] Prior to submission of the agency report, we dismissed the protester's allegations that the agency failed to evaluate what the agency "would actually pay the respective

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Timeliness

As a preliminary matter, the agency argues that our Office should dismiss as untimely Integrity's allegations of disparate treatment in the evaluation of the technical approach factor and the experience factor. Agency Briefing at 4. The agency asserts that the protester was aware of the evaluation of these factors from the prior COFC protest and furthermore, the protester was granted permission on May 13, 2026, to use certain protected material from that protest in this matter. *See id*. at 4-5; AR, Tab 55, COFC Order at 2. Yet, Integrity did not challenge the evaluation of quotations under these factors until it filed its comments on June 18, 2026.

As noted above, the agency initially issued the order to Integrity on September 29, 2025, and ASET challenged that decision in a bid protest filed at COFC on October 13, 2025. MOL at 4. As part of the COFC protest, Integrity had access to the agency's evaluation of quotations--including its evaluation of the technical approach and experience factors--that led to its initial decision to select Integrity for award. In response to that protest, the agency took corrective action, accepted quotations with limited revisions to the price and management and staffing plan factors, reevaluated

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vendors[,]" failed to assess strengths to its quotation given its incumbent status, and that the agency unreasonably evaluated the awardee's personnel and technical capabilities. Protest at 14-16. The agency requested that we dismiss Integrity's allegation that the agency unreasonably assessed the awardee's personnel and technical capabilities because its protest lacked a detailed statement of the legal and factual grounds of protest and for failure to state a basis. Agency Req. for Dismissal at 1. The intervenor, likewise, filed a request for dismissal of all protest grounds. Intervenor Req. for Dismissal. Our Bid Protest Regulations require that a protest include a detailed statement of the legal and factual grounds for the protest, and that the grounds stated be legally sufficient. 4 C.F.R. §§ 21.1(c)(4), (f). These requirements contemplate 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 action. *Warfighter Focused Logistics, Inc.*, B-423546; B-423546.2, Aug. 5, 2025, at 4. Protesters must provide more than a bare allegation; the allegation must be supported by some explanation that establishes the likelihood that the protester will prevail in its claim of improper agency action. *Id.*

Here, the protester failed to provide credible allegations to support the assertion that the agency failed to conduct a reasonable price evaluation or assess the protester strengths based on its incumbent status in accordance with the solicitation. The protester also insufficiently pled that the agency failed to reasonably evaluate the awardee's quotation with respect to the personnel and technical capabilities. 4 C.F.R. § 21.5; *see also* Electronic Protest Docketing System No. 23. Accordingly, these protest allegations were dismissed.

those revised quotations, and selected ASET for award on May 1, 2026. *Id.* at 5. Following award, Integrity filed the instant bid protest on May 8, 2026. *Id*. Integrity requested and was granted permission by the COFC on May 13, 2026 to use certain COFC protected materials in the instant protest. AR, Tab 55, COFC Order at 2.

Our regulations contain strict rules for the timely submission of protests. These timeliness rules reflect the dual requirements of giving parties a fair opportunity to present their cases and resolving protests expeditiously without disrupting or delaying the procurement process. *Gulf Master General Trading, LLC*, B-420682.2, B-420682.3, Sept. 26, 2022, at 3. Under these rules, a protest based on other than alleged improprieties in a solicitation must generally be filed no later than 10 days after the protester knew or should have known of the basis for protest. 4 C.F.R. § 21.2(a)(2). Where a protester initially files a timely protest, and later supplements it with independent grounds of protest, the later-raised allegations must independently satisfy the timeliness requirements, since our regulations do not contemplate the unwarranted piecemeal presentation or development of protest issues. *Savvee Consulting, Inc.*, B-408416.3, Mar. 5, 2014, at 5. Additionally, protest arguments raised after corrective action and re-award are untimely when the information underpinning such arguments was previously available, and the protester failed to raise these arguments in a timely manner. *See Gulf Master General Trading, LLC*, *supra* at 4.

Here, the record confirms that Integrity had access to all the materials necessary to raise its evaluation challenges under the technical approach and experience factors when it received the record in the COFC protest. Integrity then received permission from the COFC to use those materials in its GAO protest on May 13, 2026 before it filed its comments. The agency explains that the protester had copies of the original technical evaluation report, best-value recommendation, and award decision memorandum, which included the agency's final evaluation of the technical approach and experience factors. Agency Briefing at 5-6. The agency maintains that this provided the protester with the necessary information to file supplemental allegations within 10 days from May 13, 2026.[4] *See id.* at 7.

Moreover, the agency's corrective action called for the reevaluation of quotations only under the management and staffing plan and price factors; it did not allow for the submission or reevaluation of revised quotations under any other evaluation factors. AR, Tab 25, RFQ amend. 2 at 1. Thus, the protester should have known that the record of the vendors' quotations and the agency's evaluation of those quotations under the technical approach and experience factors would not have changed from the record in the COFC protest. Nevertheless, Integrity waited to raise these challenges in its comments filed on June 18, 2026, well after the 10 days it was required to file these

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[4] When the last day of the 10-day period is a Saturday, Sunday or Federal holiday, the period extends to the next day that is not a Saturday, Sunday, or Federal holiday. 4 C.F.R. § 21.0(d). Here, the last day of the period fell on Saturday, May 23, 2026. The supplemental challenges were therefore due on Tuesday, May 26, 2026 to also account for the federal holiday on Monday, May 25, 2026.

supplemental challenges. *See* Comments at 11-16. As a result, the allegations that the agency disparately evaluated quotations under the technical approach and experience factors are dismissed as untimely.[5] *Savvee Consulting, Inc., supra.*

Evaluation Under the Management and Staffing Plan Factor

The protester alleges that under the management and staffing plan factor the agency conducted an "uneven evaluation" between quotations where Integrity's quotation was rated "on the same level" as ASET. Comments at 17-18. Integrity contends that the awardee's proposed key personnel are novices with less experience, while Integrity's proposed key personnel were incumbent staff performing "identical work" for the agency, and either met or "far more often exceeded[]" the requirements in the SOW.[6] *Id.* at 17. In support of this argument, Integrity relies on information obtained from the contractor performance assessment reporting system (CPARS) to show the agency positively evaluated Integrity's key personnel where Integrity "went above and beyond" the agency's expectations under the current contract. Integrity further explains its proposed project manager has worked for the agency's global spatial management office for eight years and this should have merited a higher rating than the awardee received. *Id*. at 18.

DHS contends that it treated the quotations equally under the management and staffing plan because it did not provide either vendor "extra credit" for personnel who exceeded requirements or based on incumbent status. Agency Briefing at 22, 25.

In reviewing protests of an agency's evaluation and source selection decision in procurements conducted under the FSS procedures of FAR subpart 8.4, we do not

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[5] The protester asserts that it did raise concerns with the agency's disparate treatment in its protest but later supplemented these same concerns in its comments because it "had not yet obtained all relevant information." Integrity Resp. to Agency Briefing at 5. In support of this argument, the protester points to excerpts from its protest where it cited general propositions that "[a]n uneven evaluation process will not be endorsed by GAO" and that "a competition must be conducted on an equal basis." *Id.* at 7. These references to our caselaw without any application to the facts of this case do not establish that Integrity raised these issues in its protest. Nor do they relieve the protester from its obligation to timely raise any actual disparate treatment allegations supported by the relevant facts, which it did not do here. Moreover, our decisions repeatedly conclude that a protester need not await perfect knowledge before filing a protest. *See e.g., Peraton Inc.*, B-416916.11, Feb. 8, 2021, at 6. In this case, the protester should have raised its allegation that the agency disparately evaluated quotations under the technical approach and experience factors no later than May 26, 2026. Integrity's general citations in its protest to GAO caselaw stressing the need for an equal evaluation do not otherwise timely raise these issues.

[6] While not explicitly stated, it appears the protester also argues that it deserved an additional strength under this factor. *See* Comments at 17-18.

conduct a new evaluation or substitute our judgement for that of the agency. *Washington Business Dynamics, LLC,* B-421953, B-421953.2, Dec. 18, 2023, at 13. The evaluation of technical quotations is generally a matter within the agency's discretion, which our Office will not disturb unless it is shown to be unreasonable or inconsistent with the solicitation's evaluation criteria. *The Brewer-Garrett Co*., B-420764, Aug. 10, 2022, at 3. Furthermore, an agency's judgment that the features identified in a quotation do not significantly exceed the requirements of the solicitation or provide advantages to the government--and thus do no warrant the assessment of unique strengths--is generally a matter within the agency's discretion and one that we will not disturb where the protester has failed to demonstrate that the evaluation was unreasonable. *The Brewer-Garrett Co*., *supra* at 4. Moreover, we have consistently stated that there is no requirement that an incumbent be given extra credit for its status as an incumbent, or that an agency assign or reserve the highest rating for the incumbent contractor. *Id.*

In our view, the record demonstrates that the selection official considered the vendors' proposed key personnel and made a reasonable judgment that both Integrity and ASET either met or exceeded the requirements, but that neither quotation merited additional strengths.[7] AR, Tab 43, Technical Evaluation Report Addendum at 1-2, 4-5; *see Federal Mgmt. Sys., Inc.*, B-422222, B-422222.2, Mar. 6, 2024, at 4 (GAO generally will not disturb an agency's exercise of discretion in evaluating whether a feature of a vendor's quotation so exceeds the solicitation's requirements as to warrant the assignment of a strength, absent evidence that an agency's evaluation was unreasonable or disparate). While Integrity points to CPARS reports as support that it deserves additional strengths, the record demonstrates that the selection official properly considered the attributes of the vendors' management and staffing plan and not evaluations of the vendors' prior performance.[8] AR, Tab 47, Award Decision Memorandum at 5-6. With respect to why the agency did not discuss strengths or weaknesses attributed to the experience levels of certain proposed key personnel, the agency explains that because "key personnel often change once contracts begin[]" the agency did not find that a key personnel's resume that exceeded requirements was necessarily worth "extra credit." *See* Agency Briefing at 22-23. On this record, Integrity fails to demonstrate that the agency's decision not to assess additional strengths reflected disparate treatment or was otherwise unreasonable.[9] *See Federal Mgmt.*

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[7] The agency refers to strengths as "strong points" in its evaluation documents.

[8] In this regard, we note that Integrity improperly relies on CPARS past performance records to support its argument that it deserved additional strengths under this evaluation factor where the RFQ did not contemplate past performance as a consideration under the management and staffing plan factor.

[9] Furthermore, the agency found that several features of the protester's management and staffing plan warranted a "slightly superior" rating over the awardee's under this factor. AR, Tab 47, Award Decision Memorandum at 6.

Sys., Inc., *supra*; *see also The Brewer-Garrett Co*., *supra*. As a result, this protest ground is denied.[10]

Best-Value Determination

Integrity challenges the agency's award decision and argues that the selection official failed to look behind the adjectival ratings to compare the merits of the quotations, which resulted in a flawed determination that the protester's and awardee's quotations were considered "technically equal." Comments at 5, 8. The protester also alleges that the selection official failed to conduct an "independent determination" and instead adopted the technical evaluation team and contracting officer's statements in a "mechanical manner." *Id.*at 11. The agency contends that the best-value determination was reasonable, consistent with the solicitation, and adequately documented. MOL at 3.

Procurements conducted using FSS procedures provide for a streamlined procurement process with minimal documentation requirements. *22nd Century Techs., Inc.,* B-422659.5, B-422659.6, Jan. 14, 2025, at 4. While the documentation requirements for these types of procurements are minimal, our Office has also consistently explained that agencies may not base their selection decisions on adjectival ratings alone, as such ratings serve only as guides to intelligent decision-making; source selection officials are required to consider the underlying bases for ratings, including the advantages and disadvantages associated with the specific content of competing quotations. *See id.* Furthermore, agencies may find that vendors' quotations are essentially equivalent; however, the selection official must explain the basis for why quotations are considered technically equivalent. *Sparksoft Corp.*, B-421458.8, Mar. 15, 2024, at 9.

Here, the record demonstrates that DHS' best-value determination and selection decision were reasonable and adequately documented. In this regard, the agency's documentation of its best-value determination, and the subsequent award decision included consideration of various aspects of vendors' quotations that served the underlying basis of the assigned confidence ratings under each of the non-price factors. Specifically, the award decision documented the agency's consideration of the merits of the vendors' competing approaches. With respect to the technical approach factor, the

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[10] In its response to the agency briefing filed on July 30, 2026, the protester argued for the first time that the agency did not properly evaluate the experience and qualifications of the awardee's key personnel because the awardee failed to include resumes in its revised quotation. Integrity Resp. to Agency Briefing at 2-3. Integrity had access to the awardee's quotation as of June 8, 2026 when the agency filed its agency report in response to the protest. As noted, the timeliness requirements of our regulations do not contemplate the piecemeal presentation or development of protest issues. *Savvee Consulting, Inc.*, *supra.* Thus, we dismiss this challenge as untimely because Integrity could have raised this issue in its comments but failed to do so. 4 C.F.R. § 21.2(a)(2).

agency described specific aspects of the vendors' approaches and noted, for example, that "ASET outlined a nine-step methodology for the implementation of Geospatial Information Infrastructure (GII)-Native (Commercial-Off-The-Shelf) COTS products consistent with Systems Engineering Life Cycle (SELC) principles" while Integrity "demonstrated experience with the GMO Enterprise Management System (GEMS) which is a robust unified data management and stakeholder engagement system that consolidates and automates processes for registration, requirements capture, acquisition decisions and data review." AR, Tab 47, Award Decision Memorandum at 4. Under this factor, the agency found the protester's and awardee's approaches as relatively equal and assigned a high confidence rating. *Id*. at 5.

With respect to the agency's evaluation of vendors' management and staffing plans, the record shows that the selection official considered several features of the protester's quotation that warranted a "slightly superior" rating over the awardee's quotation. *Id.* at 6. Here, the agency noted that the protester's quotation received more strengths than ASET's quotation because Integrity proposed to "provide uninterrupted service delivery by maintaining proven staff and operational readiness throughout the transition… . [for] seamless, continuous services…" which increased the agency's confidence in Integrity's ability to "ensure a smooth and timely transition." *Id.* at 6 (quoting AR, Tab 17, Integrity's quotation at 24).

Under the experience factor, the agency found the awardee's quotation to be "slightly superior." AR, Tab 47, Award Decision Memorandum at 6. The agency stated that ASET's quotation contained two strengths while Integrity's quotation contained one strength and explained each of these points. The agency determined that ASET and Integrity similarly had strengths with respect to successfully negotiating cost reductions and that these two strengths were "relatively equal." *Id.* The agency concluded that the awardee had an "additional benefit related to the vendor's experience in stakeholder engagements" which the agency considered a "plus." *Id.*

In sum, the record demonstrates that the agency was aware of and considered the relative merits of the competing quotations. A finding that quotations are technically equal means that overall, there is no meaningful difference in what they offer, it does not mean that the quotations are identical in every respect. *Sparksoft Corp., supra* at 9-10. Here, the record shows that the selection official understood the advantages associated with the quotations under the non-price factors and found that neither was superior to the other. Specifically, after evaluation and consideration of the weighting of non-price factors, the selection official determined that the protester's and awardee's quotations were "relatively equal." The agency then reasonably determined that the awardee's quotation was "considered slightly superior to [Integrity's] when both technical and price factors are considered, due to ASET's slightly lower price." AR, Tab 47, Award Decision Memorandum at 6-7.

With respect to protester's challenge that the decision merely adopted verbatim the contracting officer and TET's analysis, the record demonstrates that the selection official's decision was reasonable. Our Office has consistently recognized that agency selection officials have broad discretion in determining the manner and extent to which it will make use of the technical and price evaluation reports in making an award decision. The fact that a selection official based a decision on the recommendation of the agency evaluators, without performing an independent review of all documentation, such as vendor quotations, is not sufficient to show that the decision did not represent their own independent judgment. *MSN Services, LLC,* B-414900 *et al.,* Oct. 4, 2017, at 8-9.

The record here shows, however, that the selection official reviewed and concurred with the assessments assigned by the TET as well as the recommendations from the contracting officer. AR, Tab 47, Award Decision Memorandum, at 1, 3-7, 10-11. As noted, after determining that the quotations were essentially equal under the non-price factors, the selection official considered price as the determining factor because there were no non-price tradeoffs to consider. *See id.* at 7. In sum, we find the agency's selection of ASET's quotation as the best-value vendor was reasonable and consistent with the solicitation. *See The Brewer-Garrett Co.*, *supra*. Accordingly, we have no basis to conclude that the selection official failed to adequately document the rationale to support their source selection decision.

The protest is dismissed in part and denied in part.

Edda Emmanuelli Perez
General Counsel