

**DEPARTMENT OF THE TREASURY
LIMITED-SOURCES JUSTIFICATION**

Acquisition Title: Debt Program Accounting System (DPAS) Support Services

This acquisition is conducted under the authority of the Multiple Award Schedule Program (see FAR 8.401)

1. Identification of the agency and the contracting activity:

The requiring activity is the Bureau of the Fiscal Service (Fiscal Service), Disbursing and Debt Management (DDM), and the contracting activity is Treasury Common Services Center (TCSC), Division of Procurement Services.

2.a Nature and/or description of the action being approved:

The purpose of this limited-sources justification is to obtain approval to award a logical follow on Time and Materials (T&M) Task Order to Creol Consulting, LLC (GSA MAS # GS-35F-0480X). This logical follow-on is of Blanket Purchase Agreement (BPA) Order # 2033H624F00107. BPA # 2033H620A00013 expired on 01/29/2026 and can no longer be used. The purpose of this limited sources justification is to purchase Debt Program Accounting System (DPAS) professional services in support of DDM, as described in section 3.a below. The Period of Performance (POP) is inclusive of one (1) 12-month period. The need by date is 04/29/2026.

2.b Name of the vendor: Creol Consulting, LLC (OTSB) Z4Y8L2REYWN3

2.c Requisition No.: FSA-481-40400-26-027

2.d Bridge contract: Yes No

2.e Brand name: Yes No

3.a A description of the supplies or services required to meet the agency's needs:

The proposed acquisition is for mission critical DPAS Support Services. DDM requires immediate specialized support for the DPAS cloud environment to assist with troubleshooting, testing, analyzing, and mediating causes of and solutions to system issues affecting the DPAS System.

It is anticipated that this requirement will utilize the following labor categories and labor rates established on Creol Consulting, LLC's GSA Schedule:

Labor Category	# of Personnel	Hourly Rate	Estimate of Hours for POP	Labor Cost
Program Manager	1	\$210.00	52	\$10,920.00
Industry Leader Subject Matter Experts (SMEs)	2	\$220.00	2080	\$915,200.00
TOTALS	3	\$430.00	2132	\$926,120.00

3.b Includes IT: Yes No NAICS: 541511 - Custom Computer Programming Services
PSC: DF01 - IT and TELECOM – IT Management Support Services (Labor)

3.c IGCE/Estimated dollar value:

The IGCE is \$ 951,120.00 inclusive of one (1) 12-month period, and the NTE CLIN for Travel costs as shown in the chart below:

POP: 04/30/2026 – 04/29/2027	\$926,120.00
NTE CLIN for Travel Costs	\$25,000.00
TOTAL	\$951,120.00

4.a Identification of the authority being used (Check the appropriate box that applies).

- FAR 8.405-6(a)(1)(i)(A) – An urgent and compelling need exists, and following the procedures would result in unacceptable delays.
- FAR 8.405-6(a)(1)(i)(B) – Only one source is capable of providing the supplies or services required at the level of quality required because the supplies or services are unique or highly specialized.
- FAR 8.405-6(a)(1)(i)(C) – In the interest of economy and efficiency, the new work is a logical follow-on to an original Federal Supply Schedule order or BPA provided that the

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original order or BPA was placed in accordance with FSS procedures in accordance with the applicable Federal Supply Schedule ordering procedures. The original order or BPA must not have been previously issued under sole-source or limited-sources procedures.

FAR 8.405-6(b) – Items peculiar to one manufacturer. (i.e., Brand Name specifications)

4.b Supporting Rationale:

The proposed support services provide the following salient functional, performance characteristics, and level of quality that will satisfy the Government's needs the use of the authority cited in 4.a:

DPAS has been transitioned from the Fiscal Service mainframe to a cloud environment as part of the Platform Evolution Program (PEP). PEP is a joint effort between Fiscal Service and the Treasury Relations and Support Office (TRSO) of the Federal Reserve System (FRS) to manage the existing FRS/Treasury applications to the cloud as well as the completion of modifications to address security requirements and mitigate issues in its daily operations. DPAS Cloud Services also include testing, solutions, troubleshooting, and operational support. Creol Consulting, LLC postured DPAS for its transition which required extensive time and knowledge for the development and strategic planning to take DPAS from the Bureau mainframe platform, which they designed and modified to meet DDM's standards and mission needs. The loss of Creol Consulting, LLC would mean the loss of institutional knowledge, time, and money that it took to develop DPAS to the transitioned cloud environment that it is today with more modifications needed as the program is developed.

i. The proposed contractor is the only source that has sufficient technical and historical knowledge of all the relevant DPAS inputs, outputs, and interfaces with source systems including but not limited to ARC's Oracle environment and the FRB-KC. Creol Consulting, LLC completed the DPAS transition from Fiscal Service mainframe to a cloud environment as part of the PEP. Creol Consulting LLC has cumulative knowledge and experience with DPAS mainframe that spans from its origin to its present that no other contractor has, and the established knowledge to provide the support services needed to allow DDM to continue in its mission.

ii. DPAS is a mission critical system that has undergone a transition to the cloud environment. Creol Consulting, LLC has SMEs that are uniquely qualified to understand all the requirements, interfaces, and DPAS design which allows them to support Fiscal Service, FRB-KC, and OCIO of the Departmental Offices with the development and implementation of the DPAS cloud environment.

iii. Creol Consulting, LLC, has specialized knowledge and experience regarding previous DPAS issues and resolutions which makes them uniquely capable to provide efficient troubleshooting and operational support for the upcoming transition which is not available from any other source.

iv. At this time, the Government is not in a position to inquire after, approve, or orient another contractor's personnel to the required systems or interfaces, or to evaluate another contractor's proposed solution. Such an effort is not in the best interest of the Government.

5. A determination by the ordering activity Contracting Officer that the order or BPA represents the best value consistent with FAR 8.404(d):

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The Contracting Officer has determined that the anticipated task order represents the best value consistent with FAR 8.404(d) and lowest overall cost alternative (considering price, special features, administrative costs) to meet the Government's needs based on prior acquisition history, the sole source nature of the required services, current Creal Consulting, LLC GSA Schedule Pricing, and market research performed by the Contracting Activity.

6. A description of the market research conducted among schedule holders and the results or a statement why market research was not conducted:

Market research was conducted by the Contracting Officer and Program Office between March 2026 through April 2026. The results of the market research support the Government's determination to obtain these services under a sole source basis. Mandatory sources of supply, Personal Property Management System (PPMS), Quality Service Management Office (QSMO), UNICOR, AbilityOne, and Acquisition Gateway were reviewed and no other potential sources were identified. Market research continued by searching Government wide acquisition contracts (GWACs). This search resulted in GSA Advantage producing 2,999 potential sources and GSA eLibrary produced 364 potential sources under NAICS Code 541511. The program office requested that a new BPA Order from BPA # 2033H620A00013 be established but due to the expiration of the BPA on 01/29/2026, another call was not possible. Given all the above, a logical follow-on is the best course of action available to obtain Creal Consulting, LCC services. Creal Consulting, LLC has a GSA MAS under contract # GS-35F-0480X. The current option end date for the contractor's GSA MAS contract is 07/04/2026 and the ultimate contract end date is 07/04/2031.

7.a Any other facts supporting this justification:

Fiscal Service has previously acquired similar support services for DDM's DPAS from Creal Consulting, LLC through the following awards:

2033H620A00013 / 2033H621F00077 DMS OM Support. This was a time and material BPA Order to Creal against their OSSS BPA. This requirement was competed as a small business set-aside among the six (6) small business OSSS BPA holders. POP: 01/02/2020 through 01/01/2022. TCV: \$966,988.96.

2033H620A00013 / 2033H623F00113. This was a time and materials BPA order to Creal against their OSSS BPA.

2033H620A00013 / 2033H624F00107. This was a time and materials BPA Order to Creal Consulting, LLC against their OSSS BPA. POP: 04/30/2024 through 04/29/2026. TCV: \$821,339.57.

7.b Attachments: Yes No

8. A statement of the actions, if any, the Requiring Activity and Contracting Activity may take to remove or overcome any barriers that led to restricted consideration before any subsequent acquisition for the supplies and services is made:

The Requiring Activity will continue to conduct market research to consider other possible sources for this requirement in the future.

9. Certifications and Approvals:

9.a Program Office Certification (Requiring Activity). I hereby certify that any supporting information and data provided (e.g., the Government's minimum needs or requirements, or other rationale for the limited sources) and which form the basis for this justification for an

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exception to fair opportunity, are accurate and complete to the best of my knowledge and belief.

Name: _____ Date: _____

Signature: _____

9.b Contracting Officer Certification and Approval. I hereby determine the circumstances of this acquisition support the justification to acquire these supplies or services on a limited source basis. I also certify this limited-sources justification is accurate and complete to the best of my knowledge and belief. Therefore, unless additional approvals are required as prescribed below, as the authorized contracting officer for this acquisition, I hereby approve the processing of this requirement on a limited-source basis.

Name: _____ Date: _____

Signature: _____

10. Additional Reviews and Approvals (As applicable):

10.a Bureau Chief Information Officer or Authorized Designee (for IT requirements that are over \$5 million, but not exceeding \$75 million) (Contracting Activity). I have reviewed this justification and find it to be accurate and complete to the best of my knowledge and belief, and representative of the Government's need. Therefore, I hereby consent to the approval of this justification. (Note: The Bureau CIO may delegate their authority for proposed contracts over \$5 million, but not exceeding \$15 million to the Associate Bureau CIO(s).)

Name: _____ **N/A** _____ Date: _____

Signature: _____

10.b Advocate for Competition (if over \$750,000, but not exceeding \$15 million) (Contracting Activity). I have reviewed this limited-sources justification and find it to be accurate and complete to the best of my knowledge and belief. Therefore, unless additional approvals are required as prescribed below, as the ordering activity's Advocate for competition, I hereby approve this limited-sources justification.

Name: _____ Date: _____

Signature: _____

10.c Head of the Procuring Activity or Authorized Designee (if over \$15 million, but not exceeding \$75 million) (Contracting Activity). I have reviewed this limited-sources justification and find it to be accurate and complete to the best of my knowledge and belief. Therefore, unless additional approvals are required as prescribed below, as the head of the procuring activity or authorized designee, I hereby approve this limited-sources justification.

Name: _____ **N/A** _____ Date: _____

Signature: _____

10.d Treasury Chief Information Officer (for IT requirements that are over \$75 million). I have reviewed this justification and find it to be accurate and complete to the best of my

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knowledge and belief, and representative of the Government's need. Therefore, I hereby consent to the approval of this justification.

Name: _____ **N/A** _____ **Date:** _____

Signature: _____

10.e Senior Procurement Executive (if over \$75 million) (Contracting Activity). I have reviewed this limited-sources justification and find it to be accurate and complete to the best of my knowledge and belief. Therefore, I hereby approve this limited-sources justification.

Name: _____ **N/A** _____ **Date:** _____

Signature: _____

