FEDERAL GROWTH

Before the RFI: What 60 Historical Cases Suggest About Federal Growth Left of Capture

How boutique technology integrators can capitalize on the new federal acquisition environment before the RFI appears.

An evidence-based growth architecture for boutique technology integrators: testing whether public signals reveal government pain before the market sees the opportunity, and what the RFO may make possible when they do.

> **THE CENTRAL IDEA**
>
> The historical data suggests there is something worth seeing before the RFI. The strategic question is which signals deserve belief—and what a contractor chooses to do with those that survive scrutiny. The RFO is the accelerant. The bounded first transaction is the bridge. Evidence is what crosses it.

GLORIA GUNN

gloria@gloriagunn.com
gloriagunn.com
linkedin.com/in/gloriagunn

Published September 2026

TABLE OF CONTENTS

SECTIONS

1 THE RULES HAVE ALREADY CHANGED 3

2 THE RFI IS NOT WHERE THE PROBLEM BEGINS 4

3 TESTING THE THESIS: A 60-CASE LOOK-BACK 7

4 A QUALIFICATION STAGE BEFORE THE OPPORTUNITY EXISTS 12

5 THE RFO ACCELERANT 14

6 PLAY FOR THE FIRST PAID STEP 19

7 WHAT THE HISTORICAL TEST SUGGESTS 22

FIGURES

1. Symptoms Accumulate Before the Purchase 6

2. What the 60 Cases Produced 8

3. The Left-of-RFI Funnel 10

4. The Qualification Progression 13

5. The FAR Continuum, Part 7 to Part 15 18

6. Stage, Question, and RFO Relevance 18

7. The Growth Equation Across a Portfolio 21

8. Two Models, Two Starting Points 21

CLOSING MATTER

Notes and Sources 23

1 THE RULES HAVE ALREADY CHANGED: CAN EARLY SIGNALS HELP CONTRACTORS ACT EARLIER?

Federal acquisition is in the midst of structural change.

In April 2025, Executive Order 14275 launched a comprehensive overhaul of the Federal Acquisition Regulation, which Acquisition.gov describes as the most significant update to the FAR in more than 40 years. OMB followed with Memorandum M-25-26, directing agencies subject to the FAR to implement the FAR Council's model deviation text through agency-specific deviations, generally within 30 days of release. The FAR Council describes this interim period as a testing period in which contracting officers are expected to use the revised text and buying guidance before formal rulemaking is complete.[1]

As of August 25, 2026, the government's RFO tracker listed 38 agency deviations for Part 10 governing market research, 35 for Part 12 governing commercial products and services, 31 for Part 13 governing simplified noncommercial acquisitions, and 30 for Part 15 governing negotiated acquisitions. Twenty-two of the 24 CFO Act agencies had adopted the Part 12 model deviation.[2]

But the more consequential change is not the number of pages removed from the FAR. It is what acquisition professionals are being encouraged to do with the discretion that remains.

The new framework places greater emphasis on commercial solutions, streamlined acquisition, early industry exchanges, oral presentations, phased acquisitions, and flexible evaluation approaches. Current FAR authorities allow simplified procedures for qualifying commercial acquisitions up to $9 million; the RFO Part 12 model text consolidates those procedures in Part 12.[3]

That does not mean every agency will suddenly buy differently. It does mean the regulatory environment is becoming more hospitable to commercial approaches, earlier engagement, and streamlined buying. Those conditions can matter to contractors capable of identifying a real government problem before it matures into a traditional competed requirement.

And that can change the economics of federal growth.

2 THE RFI IS NOT WHERE THE PROBLEM BEGINS. IT IS OFTEN WHERE THE BROADER MARKET BEGINS TO SEE IT CLEARLY.

By the time an agency issues an RFI, Sources Sought notice, or other formal market-research artifact, the underlying problem has often existed for months or years. The program has experienced symptoms, attempted interim fixes, accumulated operational consequences, and reached the point where it can begin describing the need to industry.

Traditional capture often becomes much more structured at this point. In some cases, an incumbent, existing technology provider, or contractor with established program access may already have been working with the customer as the problem developed. That company may have helped the government understand the technical environment, evaluate alternatives, or learn what a viable solution would require through legitimate customer engagement and existing work.

For contractors without that customer proximity, the RFI can represent the first time the problem becomes clearly visible. Once the RFI is public, the information-timing advantage begins to narrow.

The agency has now told the market that a problem exists. Competitors can organize around it. Capture resources are assigned. Teaming begins. Solution concepts form. Business development teams begin calling the same stakeholders. Industry starts converging on the same requirement. **The RFI does not create the opportunity. It democratizes awareness of the problem.**

That creates a very different competitive position for the company that understood the problem before the RFI. It may already understand the operating environment, failed or incomplete fixes, mission consequences, technical constraints, and affected stakeholders. If it has a relevant commercial capability, it may also have had an opportunity through lawful market engagement or an appropriately acquired bounded engagement to demonstrate whether that capability creates measurable improvement. **Many competitors begin with the document. The earlier company may begin with accumulated context and evidence.**

EARLY CAPTURE IS NOT NEW. ACCESS TO IT HAS NEVER BEEN EVENLY DISTRIBUTED.

Large incumbents and mature federal contractors have long benefited from customer proximity. Delivery personnel, program managers, account executives, technical leaders, and capture teams can observe emerging needs well before those needs become formal procurements.

That capability is far less consistent across the broader GovCon market. In the 2023 GAUGE benchmark, 65% of firms reported having a formal capture or gate process for federal proposals, but only 46% of firms with less than $10 million in annual revenue did. The 2024 benchmark found formal capture processes at 61% of firms overall and again identified smaller contractors as the group most likely to operate without one.[4]

Those statistics measure traditional capture, not the earlier practice examined here. There is currently no established industry benchmark for the percentage of contractors that systematically identify emerging government problems before an RFI or other formal market-research signal exists.

The industry has spent decades improving its ability to move left of the RFP. For smaller technology contractors, a growth advantage may come from making disciplined left-of-RFI sensing practical without requiring the scale, incumbency, and account infrastructure of a major prime.

> **THE PRACTICAL STANDARD**
>
> You do not need to recreate the account infrastructure of a billion-dollar prime. You need a repeatable way to see enough of the customer's developing problem to know where deeper human engagement is warranted.

A SIMPLE ANALOGY: THE $12,000 AC REPLACEMENT

Consider a homeowner who ultimately needs a new air-conditioning system. The $12,000 replacement may feel like the beginning of the buying decision, but the underlying problem probably began months or years earlier.

I HAVE LIVED THIS ONE PERSONALLY

First, the drain pan starts filling with water. A technician comes out, fixes the immediate problem, leaves an invoice, and moves on. Months later, the lines freeze. Another service call. Later, cool air stops reaching the vents. Another technician, another repair, another invoice. Each event can be treated as an isolated maintenance problem until someone connects the pattern and says the unit itself is failing and replacement is warranted.

The need for a new system did not suddenly appear on the day that diagnosis was made. The signals had been accumulating for years. The challenge was separating signal from noise, connecting events that appeared unrelated, and recognizing that multiple symptoms were manifestations of the same underlying condition.

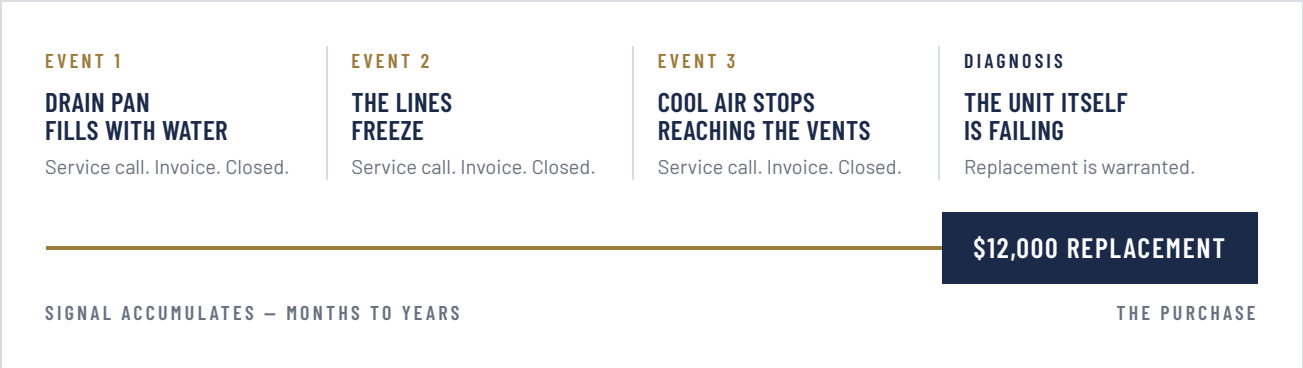

FIGURE 1. Symptoms Accumulate Before the Purchase

Each service call was explainable on its own. The buying decision only became visible once the pattern was connected.

ORGANIZATIONAL PAIN DEVELOPS THE SAME WAY

A program may experience a performance shortfall. An audit identifies a deficiency. An incumbent receives an extension. Users complain about a recurring operational limitation. Sustainment costs rise. Leadership discusses modernization. Funding language shifts. Another temporary solution is implemented. Each event can be explained independently.

A GAO finding does not automatically mean a procurement is coming. A bridge contract does not automatically mean the program is ready to replace the incumbent. A budget increase does not automatically mean money is available for your solution. A leadership statement does not automatically create an acquisition.

But neither did a frozen AC line, standing alone, mean that I needed a new $12,000 system.

A single material change may be enough to warrant investigation; convergence strengthens the case but is not required. The signal is the starting point, not the diagnosis.

3 TESTING THE THESIS: A 60-CASE HISTORICAL LOOK-BACK

The AC analogy raises an obvious question: does federal organizational pain really leave observable traces early enough to matter, or is this simply easy to see in hindsight? A bounded historical look-back was conducted to test that premise.[5]

Rather than begin with a known procurement and work backward looking for convenient clues, the study established historical snapshot dates and restricted the evidence to information that would have been publicly available at that point in time. This helped control for hindsight bias. It is much easier to recognize a pattern once the eventual outcome is known, so later reports, solicitations, and outcome information were quarantined from the initial evaluation. The study then looked forward 18 to 24 months to determine whether each case subsequently produced qualifying market-research or acquisition activity.

The test covered 60 historical cases across four snapshot periods: 2012, 2015, 2018, and 2021. The evidence examined included observable conditions such as documented operational or program problems, budget movement, recurring incumbent strain, executive attention, available acquisition pathways, and evidence that the organization was institutionally prepared to act.

The analytical posture is closer to signal analysis than lead generation: establish prior state, preserve provenance, test whether evidence is independent, seek contradictory evidence, and promote only what earns further attention.

The results supported further examination of the thesis.

Of the cases surfaced for further attention, 14 later developed qualifying acquisition activity within the observation window, while five did not. Three qualifying developments were missed, and 38 cases correctly remained inactive. Put differently, 73.7% of the cases flagged for deeper investigation later developed qualifying acquisition activity, and the framework surfaced 82.4% of all cases that eventually did. The average interval from the historical signal point to the later market event was 15.2 months.[5]

60 HISTORICAL CASES	LATER DEVELOPED QUALIFYING ACTIVITY	REMAINED INACTIVE
PROMOTED FOR INVESTIGATION 19 cases	**14** Correctly surfaced	**5** Surfaced, no activity
NOT PROMOTED 41 cases	**3** Missed developments	**38** Correctly filtered out
73.7% OF PROMOTED CASES LATER DEVELOPED ACTIVITY	**82.4%** OF ALL EVENTUAL ACTIVITY WAS SURFACED	**15.2 mo** AVERAGE SIGNAL-TO-MARKET INTERVAL

FIGURE 2. What the 60 Cases Produced

Outcomes across four snapshot periods (2012, 2015, 2018, 2021), each evaluated on information publicly available at the time. Source: author's retrospective 60-case look-back, 2026.

That does not mean a promoted signal predicts qualifying acquisition activity with 73.7% certainty. Nor does a retrospective look-back prove that the same performance will hold prospectively. At first glance, 14 qualifying developments from a 60-case study can sound modest. But that misreads the purpose of the exercise.

The look-back used later qualifying acquisition activity as a measurable external outcome. It was not intended to define the only commercially useful result. A bounded paid engagement, a justified WATCH decision, or an early decision not to commit capture resources can also create value.

The model was not intended to turn 60 observable situations into 60 capture pursuits. It was intended to function as an upstream qualification system: distinguish the relatively small number of situations that warranted deeper human investigation from the much larger number that did not.

Of the 60 historical cases examined, 41 were not promoted for further attention. Thirty-eight of those correctly remained inactive within the observation period. Only three later developed qualifying activity that the framework failed to surface.

Conversely, 19 cases were promoted for further investigation. Fourteen of those 19 (73.7%) subsequently developed qualifying acquisition activity within the observation window.

That distinction matters. The value of an upstream intelligence capability is in helping an organization determine where scarce human attention is worth spending before expensive capture resources are committed. GovCon organizations already understand this principle downstream. Pipeline reviews, opportunity scoring, gate reviews, PWin assessments, and bid/no-bid decisions exist because not every identifiable opportunity deserves capture investment. The same logic can be applied further upstream. **The difference is that the object being qualified is not yet an opportunity. It is an observed change and a developing problem hypothesis.** Promotion is permission to investigate, not confirmation that pain exists.

Under a traditional qualification model, the starting point is already an identifiable opportunity: Here are 60 opportunities. Which are worth pursuing? A left-of-RFI model begins one stage earlier. The starting point is not an opportunity, but evidence that a problem may be developing:

> **Here are 60 possible indications of emerging organizational pain. Which ones warrant enough human attention to determine whether a real problem exists?**

The purpose is not to turn those 60 signals into 60 pursuits. It is to narrow the field before expensive capture resources are committed. Human investigation narrows the field further. Capability fit narrows it again. Access, buyability, and funding narrow it further still. Only then does something become worthy of real capture investment.

The funnel could eventually look like:



FIGURE 3. The Left-of-RFI Funnel

Each stage exists to justify the cost of moving to the next one. Capture sits at the narrow end, not the wide one.

DISQUALIFY EARLY

The fact that 41 of 60 cases were not promoted is economically important. First-pass qualification performed cheaply with public evidence and technology can prevent expensive human attention from being committed too early.

The expensive asset in capture is not the data itself. It is human attention: the VP of Growth, capture manager, CTO, solution architect, SMEs, pricing team, travel, site visits, capture planning, solution development, and early pricing work that begin accumulating once an organization decides something deserves serious pursuit.

> **WHAT THE INTELLIGENCE LAYER SAYS**
>
> You do not want those resources investigating all 60 possible situations. You want an intelligence layer capable of saying: "Most of this does not yet warrant your attention. These 19 do."

Only then does the human enter more deeply into the equation: Is there real program pain? Is it persistent or consequential enough to matter? Do we understand who owns it? Does our capability actually address it? Is there a legitimate way to engage the customer and learn more? What evidence would falsify our interpretation? Is the government already spending or otherwise acting around the condition?

This is not very different from a modern commercial sales organization. A marketing-qualified lead is not automatically an opportunity. A sales-qualified lead is not automatically a proposal. A proposal is not automatically a win. Each stage exists to justify the cost of moving to the next one.

Federal growth already applies this logic once an opportunity enters the pipeline. The more interesting question is whether the same discipline should begin earlier.

Does federal growth need another qualification stage upstream of the conventional opportunity pipeline, particularly as the RFO expands acquisition discretion and agencies adopt the revised FAR framework?

4 A QUALIFICATION STAGE BEFORE THE OPPORTUNITY EXISTS

The object being qualified is not yet an opportunity. It is an observed change and a developing problem hypothesis.

Promotion is permission to investigate, not confirmation that pain exists.

The historical look-back suggests that this upstream stage can materially narrow where expensive human attention is directed. The point is not that an early signal should immediately become a capture pursuit. Quite the opposite. The purpose is to determine whether enough evidence exists to justify deeper resources and attention before traditional capture costs begin accumulating.

Traditional capture generally begins with an identifiable opportunity and asks: Is this opportunity worth pursuing, and can we win it? A left-of-RFI growth model begins earlier. The first question becomes: Is there a real problem here worth understanding?

Some signals are local. Others are broader demand vectors—a policy, funding, technology, regulatory, or organizational change that can create different pressures across multiple programs. The broader change is not itself proof of pain; each program-level condition still has to be validated on its own.

If the answer is yes, the next question shifts from problem identification to capability relevance:

> *Can our capability materially improve the condition?*

That is a materially different question from "Can we bid this?" A company may understand a genuine government problem and still have no meaningful capability to solve it. That should stop the process before substantial pursuit resources are committed. If meaningful capability fit exists, another qualification question follows:

> *Is there a lawful, commercially sensible way to prove it?*

That might mean an appropriately acquired assessment, demonstration, prototype, limited deployment, proof-of-value effort, or another bounded engagement suited to the requirement and acquisition environment. Only after those questions have survived scrutiny does the familiar capture question become appropriate:

> *Is the larger opportunity worth pursuing, and how do we win it?*

The progression then becomes:



FIGURE 4. The Qualification Progression

Three gates sit ahead of the familiar capture question. Failing any one of them should stop the spend.

The objective is not to push more things into Capture. It is to make Capture the place where only the strongest things arrive. For a forward-thinking technology contractor with a productized capability, that raises the next question: can the evolving acquisition environment make it easier to act on a well-qualified signal? The contractor does not control the acquisition method; the government does. But the RFO can change the set of practical options available to the acquisition team.

5 THE RFO ACCELERANT: TURNING EARLY INSIGHT INTO A BUYABLE FIRST STEP

The RFO did not create this growth model. It may shorten the distance between identified pain and a legitimate, commercially sensible way to test whether a solution works.

The RFO did not invent early industry engagement, commercial acquisition, prototypes, demonstrations, or simplified buying procedures. Many of those authorities and practices existed before the overhaul, and contractors have used them successfully for years.

What the RFO is doing is pulling several of those ideas together, seeking to reduce procedural friction, emphasizing commercial solutions, and placing more judgment back in the hands of acquisition professionals. Several rewritten FAR parts are particularly relevant to a left-of-RFI growth model.

FAR PART 7: START WHEN THE NEED IS IDENTIFIED

The RFO Part 7 model text directs agencies to start acquisition planning "as soon as an agency need is identified." It also requires acquisition planning to promote commercial products and services whenever feasible and directs market research to help define requirements and align them with needed outcomes.[6]

For a contractor operating left of the RFI, the strategic question is not simply, "What acquisitions are forecast?" It is, "Where is pain developing that we may be capable of materially improving?" Part 7 matters because acquisition planning begins around an identified need, not around an RFP.

A left-of-RFI growth model looks for accumulating evidence of need before the government has formally surfaced that need to industry through an RFI, Sources Sought notice, forecast, or other market-facing signal. The contractor is not attempting to predict a solicitation. It is trying to recognize when multiple observable symptoms may point to an underlying government need worth investigating before that need is broadly visible to industry.

The conversation is not, "We saw your forecast and would like to tell you about our company." It is something different: "We think we understand a problem you are experiencing. We already have a capability that may address part of it. Would it be useful to explore whether it actually fits your environment?" That is a stronger starting position, and the acquisition environment is becoming more receptive to that posture.

FAR PART 10: ENGAGE THE MARKET BEFORE THE REQUIREMENT IS WRITTEN

Part 10 may be even more important to this growth model. The RFO Part 10 model text requires market research before agencies develop new requirements documents, encourages responsible and constructive exchanges with industry, and establishes a priority for determining whether commercial products or services can satisfy the government's need, including whether requirements could be modified to make commercial solutions viable.[7]

For a productized technology company, this creates a fundamentally different posture from waiting for an RFI to appear and then responding to it. The contractor wants to have done enough homework beforehand to recognize the pain and engage before the problem becomes common market knowledge. That is very different from arriving with a generic capability deck looking for somewhere to sell a product.

Early signal creates a reason to engage

If the company has already detected a credible program-problem pattern, Part 10 is where that upstream intelligence can become legitimate market dialogue. The company is not arriving cold with the typical posture of, "Here is our capability deck. What do you have for us?" Instead, it arrives with a hypothesis grounded in the customer's environment.

> THE DISTINCTION
>
> Early intelligence does not replace the conversation. It makes the conversation worth having. That is a materially stronger position for a small technology-based government contractor.

FAR PART 11: HELP INFORM THE OUTCOME BEFORE THE MARKET ARRIVES

The RFO Part 11 model text directs agencies, to the maximum extent practicable, to describe needs in terms of functions, required performance, or essential physical characteristics rather than prematurely prescribing a detailed technical solution. It also requires requirements to enable and encourage commercial solutions and limits restrictive provisions to those necessary to satisfy the government's legitimate needs.[8]

If a contractor has already surfaced credible evidence of a developing mission problem, investigated it, and concluded that an existing capability may materially improve the outcome, it is in a much stronger position than a company arriving later to ask, "We sell X. Do you have anywhere we can use it?"

If that early work also helps inform how the government ultimately describes the required outcome, the contractor may be even better positioned when the need is eventually made public.

> **THE BOUNDARY MATTERS**
>
> Part 11 still requires agencies to promote competition and limits restrictive requirements to those necessary to satisfy the government's need. Writing a requirement around one manufacturer's peculiar feature requires specific support and justification. That does not eliminate shaping. It defines the legitimate version of it and the opening for a smart contractor to engage early before the need is broadly visible to the market.

FAR PART 12: A MORE DIRECT COMMERCIAL BUYING PATH

The RFO Part 12 model text consolidates commercial acquisition procedures and provides simplified procedures for qualifying commercial acquisitions up to $9 million in ordinary circumstances. It also expressly prioritizes commercial products and services when they are available to meet agency needs.[9] Part 12 does not create demand or funding; it can increase buying flexibility once a real need, capacity to act, and a suitable commercial approach already exist.

The significance is that a meaningful commercial engagement does not necessarily have to wait for a massive Part 15 procurement to become economically worthwhile. The first objective need not be to win the $50 million modernization contract. It may be to get paid to solve a bounded piece of the problem and generate credible evidence that tells both parties whether something larger is warranted.

FAR PART 15: THE RFI IS NOT THE BEGINNING OF THE CONVERSATION

The RFO Part 15 model text encourages exchanges between government and industry from the identification of a requirement through receipt of proposals. It expressly contemplates early exchanges, draft RFPs, RFIs, phased acquisitions, and oral presentations as part of the negotiated-acquisition framework.[10]

For a left-of-RFI growth model, the RFI is simply one formal market-research tool. By the time an RFI appears, the government has identified enough of a need to describe some portion of the problem publicly and ask industry for information.

Part 15 explicitly recognizes an engagement period before that point.

For a contractor that has already surfaced credible evidence of a developing problem, the objective is not to wait for the RFI and discover what everyone else has just learned. The early signal provides a reason to determine whether deeper human engagement is warranted while the government is still understanding the requirement. The conversation might begin with:

> *We think we understand a problem you are experiencing. We already have a capability that may address part of it. We would like to understand whether our interpretation is correct and whether our solution is relevant to your environment.*

If the hypothesis is wrong, the contractor learns early and moves on before significant capture resources are committed. If it is right, the contractor has entered the conversation before the RFI makes the problem broadly visible to the market.

A contractor that identified the problem early may already have spent months understanding the operating environment, testing assumptions, learning the customer's constraints, demonstrating relevant capability, and contributing legitimate market knowledge while the government was still determining what it needed and how that need should be expressed. When the RFI eventually appears, competitors may receive the same document. They do not necessarily possess the same accumulated understanding.

This is where the practical value of shaping enters the equation. The objective is not privileged access to a future solicitation. It is to participate early enough that legitimate market engagement, technical evidence, and customer learning can help inform how the government understands the problem while the contractor still possesses an information-timing advantage over the broader market.

Part 15's unsolicited-proposal provisions reinforce the broader point. The FAR expressly contemplates contractor-originated innovative ideas before a known competitive requirement exists and permits preliminary agency contact in appropriate circumstances. A left-of-RFI growth model does not depend on unsolicited proposals, but their existence demonstrates that legitimate contractor-originated engagement can occur before a requirement has been publicly packaged as a procurement.[11]

The left-of-RFI advantage occurs at the front end of that continuum. In practical terms:

- Part 7: The need exists before the procurement; this is where early planning can begin.
- Part 10: The government investigates what the market can provide and whether commercial capability can satisfy the need.
- Part 11: The requirement can still be informed by legitimate market knowledge and performance outcomes.
- Part 12: A relevant commercial capability may have a bounded path to purchase and proof.
- Part 15: Legitimate industry engagement can begin well before formal competition.



FIGURE 5. The FAR Continuum, Part 7 to Part 15

The left-of-RFI advantage occurs at the front end of the continuum, before the requirement is publicly packaged as a procurement.

STAGE	LEFT-OF-RFI QUESTION	RFO
NEED	*Is a real problem developing?*	PART 7
MARKET UNDERSTANDING	*Is our interpretation correct, and does commercial capability exist?*	PART 10
OUTCOME FIT	*Can our capability materially improve the condition?*	PART 11
PAID PROOF	*Is government acting, and is there a bounded commercial way to test it?*	PART 12
LARGER PURSUIT	*Has enough formed to justify Capture?*	PART 15

FIGURE 6. Stage, Question, and RFO Relevance

Each upstream stage has its own question and a particularly relevant RFO FAR part.

6 PLAY FOR THE FIRST PAID STEP, NOT THE FINAL CONTRACT

How boutique integrators can turn early intelligence into a bounded, buyable first step that generates evidence before the larger requirement matures.

Identifying a problem early creates an information advantage. But that advantage only becomes commercially meaningful if the contractor has a capability that can credibly address the problem. Even then, capability fit alone does not create a contract. The next challenge is determining whether there is a practical way for the government to buy enough of that capability to test it. This is where the RFO becomes part of the growth equation.

ACQUISITION READINESS IS PART OF BUYABILITY

For a smaller technology GovCon, acquisition access should be treated as part of the growth strategy rather than as an administrative afterthought. GSA schedules, governmentwide acquisition contracts (GWACs), agency IDIQs, BPAs, and other established purchasing channels—along with teaming arrangements that can provide access through partners—can give the contractor multiple legitimate routes to market. The point is to build acquisition access around the agencies, problems, and capabilities the company intends to pursue.[12]

Acquisition readiness is best judged from both available authority and observed buying behavior: what the customer has actually purchased, through which channels, from whom, and at what scale.

A company that identifies the right problem but is difficult to buy from may still be poorly positioned. The objective is to shorten the distance between "This appears relevant" and "There is a practical way to buy enough of it to find out."

If agencies are being encouraged to engage industry earlier, consider commercial solutions first, describe requirements around outcomes rather than prematurely prescribing designs, and use streamlined acquisition approaches where appropriate, the contractor has another question to ask:

What is the smallest commercially sensible piece of this problem we can solve now that would produce meaningful evidence for both sides?

That first step does not have to resemble the eventual enterprise acquisition. It might be a bounded assessment, a limited deployment, a technical integration, a proof-of-value effort, a demonstration with measurable outcomes, or another appropriately acquired piece of work. The exact vehicle and acquisition method remain the government's decision.

The point is to make the first engagement small enough to be buyable, meaningful enough to matter, and useful enough to answer questions the larger pursuit would otherwise spend months trying to answer.

A bounded paid engagement can also be a successful outcome in its own right. It does not require a later enterprise procurement to justify the work.

For a smaller, growing GovCon technology company, the objective need not be to identify a $50 million opportunity and immediately begin spending toward the eventual win. That is a familiar opportunity-led model, and it can become expensive quickly.

A LEFT-OF-RFI FEDERAL GROWTH MODEL SUGGESTS A DIFFERENT POSTURE

> **THE POSTURE**
>
> Do not begin by asking how to win the largest contract. Begin by asking what is the smallest meaningful piece of the problem the government can legitimately buy that allows you to prove you belong there—or learn early that you do not.

If that first transaction works, it does more than generate revenue. It produces customer understanding, operating experience, technical evidence, implementation knowledge, and proof of mission effect that the contractor would otherwise spend scarce capture resources trying to develop before award.

Across a portfolio, that creates a different growth equation:



FIGURE 7. The Growth Equation Across a Portfolio

Filter earlier, spend human attention later, create revenue sooner where possible, and reinvest what is learned into the strongest expansion opportunities.

For a smaller modernization-focused contractor, the objective is not to recreate the breadth of a billion-dollar prime. It is to go narrow: identify the handful of problems where the company has a genuine right to play, establish enough acquisition access to be buyable, prove value through the smallest meaningful first step, and expand from evidence.

Consider the difference:

OPPORTUNITY-LED MODEL

Begin with an identifiable opportunity and determine whether/how to pursue it.

STARTS WITH

An identifiable opportunity or formal market-facing signal already visible to the broader market.

SPENDS FIRST ON

Opportunity qualification and Capture resources as the pursuit develops.

EVIDENCE BUILDS

Through customer engagement, Capture, solution development, competitive analysis, and the pursuit itself.

FEDERAL GROWTH MODEL

Find the right problem early enough to earn the first piece of work, use that work to prove the case, and let the evidence determine how far the opportunity deserves to grow.

STARTS WITH

An observed change and a developing problem hypothesis, before the market can see an opportunity.

SPENDS FIRST ON

Cheap upstream qualification, then a bounded paid step where warranted.

EVIDENCE BUILDS

Before the larger requirement matures.

FIGURE 8. Two Models, Two Starting Points

The difference is where the process begins, where early resources are spent, and when evidence starts to accumulate.

7 WHAT THE HISTORICAL TEST SUGGESTS

This paper began with a simple question: does government pain become visible before the government formally tells industry that the problem exists?

In the historical test, 60 cases were examined using only information that would have been publicly available at the time. Nineteen survived the early qualification filters. Fourteen later developed qualifying acquisition activity, while 38 of the 41 situations filtered out remained inactive during the observation period. The average interval from the historical signal point to the later market event was 15.2 months.

A retrospective study does not establish future performance or prove that every early signal will become an opportunity. What it does suggest is that the information window exists early enough to matter and can be narrowed enough to make selective human investigation economically plausible.

The practical live-use test is therefore broader than whether an RFI eventually appears: does the evidence support real pain, visible government action, and a plausible bounded way for the right contractor to create value?

For a smaller technology GovCon, that creates a choice. Growth can begin when a need becomes broadly visible to the market, or it can begin earlier: identify the right problem, determine whether the company has a genuine right to play, make sure it is positioned to be bought, seek the smallest meaningful paid step that can prove value, and let the evidence determine what deserves to grow.

THE POINT

The historical data suggests there is something worth seeing before the RFI. The strategic question is which signals deserve belief and what a contractor chooses to do with those that survive scrutiny. The RFO is the accelerant. The bounded first transaction is the bridge. Evidence is what crosses it.

© 2026 Gloria Gunn. All rights reserved.
This publication may be shared in its complete, unaltered form with attribution. Excerpts may be quoted with attribution. Commercial reproduction or adaptation requires written permission.

NOTES AND SOURCES

Web sources were verified on August 25, 2026, unless otherwise noted.

1 Executive Order 14275, 'Restoring Common Sense to Federal Procurement,' Apr. 15, 2025, whitehouse.gov/presidential-actions/2025/04/restoring-common-sense-to-federal-procurement; Office of Management and Budget, Memorandum M-25-26, 'Overhauling the Federal Acquisition Regulation,' May 2, 2025, whitehouse.gov/wp-content/uploads/2025/02/M-25-26-Overhauling-the-Federal-Acquisition-Regulation-002.pdf; Acquisition.gov, 'RFO — Frequently Asked Questions,' acquisition.gov/far-overhaul/faqs.

2 Acquisition.gov, 'FAR Parts and Agency Deviations,' Revolutionary FAR Overhaul, acquisition.gov/far-overhaul/far-part-deviation-guide (accessed Aug. 25, 2026). Agency counts in the text are based on the tracker as of that date; the Part 12 count includes 22 of the 24 CFO Act agencies.

3 Acquisition.gov, 'FAR Overhaul — Part 12,' §§ 12.001 and 12.201-1, acquisition.gov/far-overhaul/far-part-deviation-guide/far-overhaul-part-12; Acquisition.gov, 'FAR Overhaul — Part 15,' §§ 15.103-4 and 15.105-1, acquisition.gov/far-overhaul/far-part-deviation-guide/far-overhaul-part-15.

4 CohnReznick and Unanet, 2023 GAUGE Report, Growth section, p. 36, info.unanet.com/gauge-report-2023; CohnReznick and Unanet, 2024 GAUGE Report, Growth section, p. 44, info.unanet.com/2024-gauge-report.

5 Author's retrospective 60-case historical look-back, conducted in 2026. Cases were evaluated at fixed historical snapshot dates using only information publicly available at the time; later solicitation and outcome information was quarantined during initial classification.

6 Acquisition.gov, 'FAR Overhaul — Part 7,' §§ 7.102-7.104, acquisition.gov/far-overhaul/far-part-deviation-guide/far-overhaul-part-7.

7 Acquisition.gov, 'FAR Overhaul — Part 10,' § 10.001, acquisition.gov/far-overhaul/far-part-deviation-guide/far-overhaul-part-10.

8 Acquisition.gov, 'FAR Overhaul — Part 11,' §§ 11.102 and 11.204, acquisition.gov/far-overhaul/far-part-deviation-guide/far-overhaul-part-11.

9 Acquisition.gov, 'FAR Overhaul — Part 12,' §§ 12.000-12.201, acquisition.gov/far-overhaul/far-part-deviation-guide/far-overhaul-part-12.

Notes and Sources — continued.

10 Acquisition.gov, 'FAR Overhaul — Part 15,' §§ 15.101, 15.103-4, and 15.105-1, acquisition.gov/far-overhaul/far-part-deviation-guide/far-overhaul-part-15.

11 Acquisition.gov, 'FAR Overhaul — Part 15,' subpart 15.5, especially §§ 15.502-15.506, acquisition.gov/far-overhaul/far-part-deviation-guide/far-overhaul-part-15.

12 Acquisition.gov, 'FAR Overhaul — Part 7,' § 7.102(b)(4)(use of existing contracts), acquisition.gov/far-overhaul/far-part-deviation-guide/far-overhaul-part-7; Acquisition.gov, 'FAR Overhaul — Part 12,' § 12.200(a)(including Federal Supply Schedules and Governmentwide acquisition contracts), acquisition.gov/far-overhaul/far-part-deviation-guide/far-overhaul-part-12; FAR 13.303, 'Blanket Purchase Agreements (BPAs),' acquisition.gov/far/13.303.

PRACTITIONER NOTE

This paper is a point of view on federal growth strategy. It is not legal or contracting advice. Acquisition method, vehicle selection, and the terms of any engagement remain the government's decision.