Global Acquisitions

U.S. DEPARTMENT *of* STATE

JUSTIFICATION FOR OTHER THAN FULL AND OPEN COMPETITION	
SECTION 1: IDENTIFICATION OF THE AGENCY AND THE CONTRACTING ACTIVITY	
Department of State Contracting Activity	☒ Office of Acquisitions Management
Requiring Activity	Post/Mission Juba, South Sudan
SECTION 2: NATURE AND/OR DESCRIPTION OF THE ACTION BEING APPROVED	

This request seeks approval to proceed with a sole-source modification for contract 19AQMM26C0204 and extension to award a cost-plus-award-fee modification to RA International (RA) for the supplies and services described in Section 3.

RA International's corporate address is Building 41, 3B Street, Al Quoz Industrial Area 1, Dubai, United Arab Emirates.

The extension is required to maintain uninterrupted life support and maintenance services during the drawdown and decommissioning of the Residential Compound (RC)--which includes the Tactical Operations Center--and Embassy Compound (EC), while supporting the transition to the New Embassy Compound (NEC). The NEC is projected to open between December 2028 and February 2029. Upon opening, life support services will shift to the NEC; however, limited services will continue at the RC and EC to ensure orderly decommissioning and facility closeout. This phased approach also allows the Government to plan and implement a full and open competition for long-term LSS at the NEC without operational disruption. The competition for the long-term LSS contract will begin in early-2027.

The current contract period of performance is 1 June 2021 through 31 May 2026. The proposed extension period of performance is 1 June 2026 through 31 December 2028, for an estimated duration of 31 months at largely the full scope of services. If the NEC completion is delayed, the extension could continue through 28 February 2029, for a total of 33 months. Following this period, a reduced level of life support services is anticipated for an additional eight months (March 2029 – October 2029) to complete final transition and facility closeout.

This phased transition requires continuous contractor support across multiple locations, with services gradually reduced at the RC and EC as operations transfer to the NEC. Extending the existing contract provides the flexibility necessary to manage this transition without disruption to mission operations.

Summary of the extension period of performance:

- 1 June 2026 – 31 December 2028 (31 months): Continue services to support ongoing operations and transition.
- 1 January – 28 February 2029 (2 months, if NEC completion is delayed): Continue services until NEC is operational.
- March 2029 – October 2029 (8 months): Limited life support services to support final decommissioning. Most LSS functions will have transitioned to the NEC and will be performed under a newly competed LSS contract.

The estimated cost of this extension until October 31, 2029, is [redacted]

This action is necessary to ensure continuity of critical services during the transition period, prevent disruption to diplomatic and mission operations, and maintain compliance with security, safety, and operational requirements in Juba, South Sudan.

This contract has been formally transferred from USAID systems to DOS systems. The former USAID contract number was 72066821C00004. The current DOS contract number is 19AQMM26C0204. As a result of this transfer, the contract is now fully incorporated into DOS systems, including Ariba and GFMS, for all future actions.

SECTION 3: DESCRIPTION OF SUPPLIES/SERVICES REQUIRED TO MEET THE AGENCY'S NEEDS

This contract provides essential life support and maintenance services necessary for the United States to carry out its mission operations in Juba, South Sudan. The operational environment in Juba is complex and presents significant challenges, including past ordered departures due to civil unrest, inconsistent availability and quality of local supplies, and a difficult labor market. Continuity of these services during both normal operations and the planned transition from the current RC and EC to the NEC is critical to mission success, safety, and security.

RA International has established international supply chains capable of procuring quality goods and supplies, including food, equipment, and other mission-essential materials which are often unavailable, unsafe, or substandard locally. The contractor must provide 24-hour emergency maintenance support. All contractor personnel must undergo background investigations and medical clearance, requiring management to anticipate staffing needs to prevent service disruptions.

Services under this contract are performed within secure compounds, and access is restricted to authorized personnel. Furthermore, during the transition period to the NEC, the contractor must maintain uninterrupted life support services at the RC and EC while gradually shifting operations to the new facility.

Required services include, but are not limited to:

- Customer registration and guest services
- Lodging preparation and make-ready services
- Lodging reservations and occupancy management
- Laundry services
- Food service, including support for representational events and restaurant operations
- Kitchen and dining facility operations
- Building repairs and maintenance
- Grounds maintenance
- Fuel tanks and water tank maintenance

All services must be provided at a level consistent with a three-star U.S. hotel and monitored through a quality control plan to ensure consistent service delivery. The combination of logistical capability, local operational experience, and ability to provide continuous, quality service is essential to meet the agency's mission objectives, particularly during the phased transition to the NEC.

SECTION 4: IDENTIFICATION OF THE STATUTORY AUTHORITY PERMITTING OTHER THAN FULL AND OPEN COMPETITION

This acquisition is conducted under the authority of 41 USC 3304, as implemented by FAR 6.1 and substantiated by the following:

☒ FAR 6.103-2 – Unusual and compelling urgency

Note: FAR 6.103-2(c)(2) limits the total period of performance for actions under unusual and compelling urgency to one year unless the head of the agency determines that exceptional circumstances apply. An exceptional circumstances determination, separate from this J&A, will be documented in the contract file and approved at the appropriate level. The J&A, together with the approved exceptional circumstances determination, constitutes the full basis for this contract extension under FAR 6.103-2.

SECTION 5: DEMONSTRATION THAT THE PROPOSED CONTRACTOR'S UNIQUE QUALIFICATIONS OR THE NATURE OF THE ACQUISITION REQUIRES USE OF THE AUTHORITY CITED

This acquisition is justified under FAR 6.103-2 due to unusual and compelling urgency. [redacted]

The current contract supports housing, food service, maintenance, utilities, emergency response capability, and other essential services necessary for the safe and secure operation of the U.S. mission in Juba. [redacted]

The RC and EC are scheduled for decommissioning as operations transition to the NEC. During this period, services must continue without interruption while facilities are reduced, repurposed, and prepared for eventual disposition. This creates a compressed and sensitive timeframe in which flexibility and uninterrupted support are essential.

The time required to conduct a full and open competition, evaluate proposals, make an award, and allow for contractor mobilization and personnel clearances exceeds the time available to avoid disruption of services. Transitioning to a new contractor in this environment would require recruiting and clearing personnel, obtaining medical approvals, establishing supply chains, and integrating into secure compounds. These actions cannot be completed without creating a significant risk of service gaps. A gap in LSS support would result in serious harm to Government operations.

The NEC represents a separate and distinct requirement. It is a modern facility with infrastructure, systems, and service standards that differ significantly from those of the RC and EC. The NEC LSS requirement must be separately scoped and competed under full and open competition. To meet the projected NEC opening between December 2028 and February 2029, the competition must begin approximately 18 months in advance, by early 2027. This acquisition planning is underway.

The urgency addressed in this J&A is limited to the immediate need to prevent disruption of essential services at the RC and EC during the transition period. This extension does not delay or avoid future competition. Rather, it ensures continuity of mission-critical services while the Government properly plans and executes a full and open competition for the NEC LSS requirement.

[redacted] The need to maintain uninterrupted life support services during the drawdown and transition period constitutes unusual and compelling urgency under FAR 6.103-2.

SECTION 6. DESCRIPTION OF EFFORTS TO ENSURE THAT OFFERS WERE SOLICITED FROM AS MANY POTENTIAL SOURCES AS IS PRACTICABLE, INCLUDING WHETHER A NOTICE WAS OR WILL BE PUBLICIZED AS REQUIRED BY FAR SUBPART 5.1 AND, IF NOT, WHICH EXCEPTION UNDER FAR 5.101 APPLIES

The original LSS contract for the RC and EC was awarded using full and open competition. Multiple sources were solicited, proposals were evaluated, and award was made following a complete competitive process. This reflects the Government's consistent intent to obtain competition when time and circumstances permit.

For the current requirement, the Government is operating under unusual and compelling urgency. The need to prevent disruption of essential life support services during the drawdown of the RC and EC does not allow sufficient time to conduct a full and open competition without risking serious harm to mission operations. The time required to solicit offers, evaluate proposals, make award, and allow for contractor mobilization and personnel clearances exceeds the time available before performance continuity would be affected.

Given the operating environment in Juba, any new contractor would require significant lead time to recruit and clear personnel, obtain medical approvals, establish supply chains, and integrate into secure compounds. Attempting to conduct a competition under these circumstances would likely result in service gaps or operational instability. Under FAR 6.103-2, the Government is permitted to limit competition to the extent necessary to address the urgent requirement.

Accordingly, this extension is limited to the minimum period necessary to avoid disruption of essential services while the Government prepares and conducts a full and open competition for the NEC LSS requirement. This J&A will be posted publicly in accordance with applicable requirements to ensure transparency.

The future LSS requirement for the NEC will be competed using full and open competition procedures. Because the NEC is a modern, newly constructed facility with significantly different systems, staffing requirements, and service expectations compared to the RC and EC, this requirement will be scoped, solicited, and awarded as a separate acquisition. The NEC LSS competition will be conducted under full and open competition and publicized in accordance with FAR Subpart 5.1 to allow the widest practicable participation from qualified sources.

In summary, the Government has promoted competition where conditions allow. The original LSS contract was competed, the NEC LSS requirement will be competed, and this limited extension is justified under unusual and compelling urgency because the time necessary to conduct full and open competition is not available without risking serious harm to mission operations.

SECTION 7. DETERMINATION BY THE CONTRACTING OFFICER THAT THE ANTICIPATED COST TO THE GOVERNMENT IS FAIR AND REASONABLE

The Contracting Officer has determined that the anticipated cost of approximately [redacted] for the supplies and services covered by this J&A is expected to be fair and reasonable. This determination is supported by established historical pricing for life support services in Juba and other similar overseas posts.

The Government has a solid record of prior contract pricing for this requirement and sufficient comparable data from other missions to construct a reliable independent government cost estimate (IGCE).

The IGCE reflects current conditions in Juba, incorporates known cost drivers, and aligns with market trends for life support and maintenance services performed in hardship locations. The pricing associated with this extension is consistent with the scope of services, the labor and logistical demands required in South Sudan, and the continuity needs described in earlier sections of this document.

The original contract was awarded following full and open competition, and a detailed analysis supporting price reasonableness. The anticipated cost for this extension is deemed to be fair and reasonable, and in the best interest for the U.S. Government, based on available market information, historical cost data, and the operational requirements outlined in Sections 2 and 3.

The Government will complete all required price and cost analysis before award and will apply any necessary techniques to support the final determination of price reasonableness.

SECTION 8. DESCRIPTION OF THE MARKET RESEARCH CONDUCTED (SEE PART 10) AND THE RESULTS OR A STATEMENT OF THE REASON MARKET RESEARCH WAS NOT CONDUCTED

The Government has conducted market research focused on planning and scoping the future LSS contract for the NEC. This research is ongoing and is aimed at understanding the specific requirements of a modern facility that will replace the aging RC and EC. The research includes identifying the maintenance standards expected for the new facility, the level of technical skill required to support new building systems, and the adjustments needed in food service, kitchen operations, laundry capability, and other life support functions once operations transition to the NEC.

The Government is reviewing information from similar posts, industry capabilities, and historical data to determine the level and quality of service required at the NEC. The NEC will feature modern systems, updated infrastructure, and higher maintenance expectations than the current compounds. Properly scoping this requirement requires detailed analysis beyond current contract experience, and this ongoing market research will support a full and open competition for the NEC LSS contract.

Market research confirms that qualified firms exist within the broader life support services industry. However, the time required to conduct a full and open competition for the short transition period, including solicitation, evaluation, award, contractor mobilization, personnel security clearances, medical approvals, and operational integration into secure compounds in Juba, exceeds the time available to avoid disruption of essential services. Given the operating environment, security constraints, and compressed drawdown schedule, transitioning to a new contractor during this period would create a substantial risk of service interruption.

The current extension is limited to the minimum period necessary to maintain uninterrupted services during the transition from the RC and EC to the NEC. Based on the market research conducted and the operational realities in Juba, limiting competition for this short-term requirement is necessary to prevent serious harm to mission operations.

The Government will continue to document all market research findings as it finalizes the acquisition strategy for the NEC LSS contract, which will be conducted under full and open competition.

SECTION 9. ANY OTHER FACTS SUPPORTING THE USE OF OTHER THAN FULL AND OPEN COMPETITION

Operational risk is a significant concern. Any disruption in life support services would directly affect housing, food service, post security support, day-to-day Embassy functions, and ultimately the Mission's ability to remain open. Introducing a new contractor for a short and sensitive period would add unnecessary instability to an already complex and high-risk operating environment, creating an urgent need to maintain continuity.

As such, additional factors support the use of other than full and open competition for this short-term extension. Embassy leadership has consistently emphasized the critical importance of maintaining uninterrupted services during the drawdown of the RC and EC and the transition period prior to the opening of the NEC. The urgency of maintaining operations in this period is compounded by the high-threat environment in Juba and the limited time available to safely and effectively transition any contractor.

South Sudan is a one-year tour of duty and represents one of the Department's most difficult assignments. It has been a challenging environment for the past decade. U.S. Government personnel work and reside in secure compounds, which they cannot leave after 7:00 pm. Post is rated critical for crime and political and ethnic violence. Escalating subnational violence and economic shocks associated with inflation and currency devaluation have further exacerbated the effects of poor macroeconomic conditions and protracted political conflicts on household food and income sources.

The Ambassador endorses the extension request of the existing LSS contract given the complex and challenging environment in which Embassy Juba operates. The safety and security of all personnel at post is the Department's highest priority in this high-threat post that has been subject to multiple ordered departures since December 2013 due to civil unrest, including for five months in 2025. Deepening political volatility and economic instability translate into significant limitations on the availability and poor quality of supplies and goods. An intimate understanding of the complex operating environment is needed to safely and efficiently manage the embassy platform in South Sudan, and continuity of services is essential for safeguarding Mission personnel and maintaining critical operations.

The labor market presents substantial limitations, including significant challenges in recruiting, training, and managing skilled staff, many of whom must be recruited from neighboring countries. The challenges of staffing and operating the life support contract for Post are such that any changes to the existing contract would require significant lead time, which, under the current compressed schedule, would introduce operational risk. Extending the existing contract is therefore the most secure, practical, and cost-effective solution to meet urgent mission needs.

Moreover, security constraints in Juba further support this decision. Contractor personnel require both background clearances and medical approvals, which are time-intensive processes. Secure compound access is

limited to cleared personnel, and onboarding a new workforce for a temporary period is not practical under these conditions.

The limited duration of the extension also makes full and open competition impractical. Conducting a competition for a short transition period would require considerable time and resources, while providing minimal benefit and potentially creating gaps in services. Attempting to compete the requirement could, in fact, increase cost, administrative burden, and operational risk—an unacceptable outcome given the urgency of maintaining continuity during the drawdown.

Taken together, these factors demonstrate that a sole-source extension to RA International is the most prudent and responsible approach. The contractor's established capabilities, institutional knowledge, and presence in Juba ensure continuity of critical services, mitigate operational and security risks, and support a smooth transition to the NEC while allowing the Government to properly plan and conduct a future full and open competition for long-term life support services at the new facility.

SECTION 10. LISTING OF THE SOURCES, IF ANY, THAT EXPRESSED, IN WRITING, AN INTEREST IN THE ACQUISITION

At this time, no other sources have expressed written interest in providing life support services for the short-term extension covered by this J&A. Given the urgent and time-sensitive nature of this transition period, it is critical to rely on the current contractor to maintain uninterrupted services at the RC and EC.

The Government recognizes the value of industry input and intends to incorporate opportunities for questions, feedback, and proposals in the upcoming full and open competition for Life Support Services at the NEC. This future solicitation will be publicized in accordance with FAR Subpart 5.1 and will provide qualified vendors the opportunity to participate and submit proposals.

Potential sources will be encouraged to review the forthcoming NEC solicitation and provide feedback to ensure that the requirements are clear, achievable, and aligned with industry capabilities. This approach ensures transparency, promotes competition where practicable, and supports the development of a high-quality contract for the NEC while maintaining continuity of critical services during the transition period.

SECTION 11. STATEMENT OF THE ACTIONS, IF ANY, THE AGENCY MAY TAKE TO REMOVE OR OVERCOME ANY BARRIERS TO COMPETITION BEFORE ANY SUBSEQUENT ACQUISITION FOR THE SUPPLIES OR SERVICES REQUIRED

For the upcoming LSS contract at the NEC, the Government is taking proactive steps to remove or mitigate barriers to competition. The NEC requirement will be scoped as a separate and distinct acquisition from the current short-term extension, reflecting the modern facilities, updated infrastructure, and higher technical and service standards required at the NEC.

The Government is conducting comprehensive market research to identify potential sources, assess industry capabilities, and refine performance requirements. This research covers maintenance standards, food service operations, kitchen and dining capabilities, laundry services, and other life support functions. The goal is to ensure that the NEC solicitation is clear, achievable, and accessible to qualified vendors.

In addition, the NEC solicitation will include structured opportunities for questions, feedback, and industry engagement. All responsible sources will have the opportunity to provide input, clarify requirements, and compete on a level playing field. These measures will help remove or reduce barriers to competition and support a robust, full and open acquisition process.

These actions demonstrate the Government's commitment to promoting competition for future acquisitions while recognizing that the current short-term extension is an urgent, mission-critical requirement. Extending the existing contract ensures uninterrupted life support services at the RC and EC, maintains operational and security continuity during the transition period, and allows sufficient time to properly plan, scope, and conduct a full and open competition for the NEC LSS contract.

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SECTION 12. CERTIFICATIONS

All reviews and approvals should be completed in the order listed unless otherwise authorized or required.

TECHNICAL AND REQUIREMENTS CERTIFICATION (FAR 6.104 (b))
I certify that the facts and representations under my cognizance which are included in this Justification and its supporting acquisition planning documents, except as noted herein, are complete and accurate to the best of my knowledge and belief.

Technical and Requirements Cognizance:
SIGNATURE:

[redacted]

Date

LEGAL SUFFICIENCY REVIEW
This J&A is hereby determined to be legally sufficient.

[redacted]

CONTRACTING OFFICER CERTIFICATION (FAR 6.104-1(a)(12))
I certify that this submission is accurate to the best of my knowledge, and that it contains complete information necessary to enable other officials to make an informed recommendation for approval or disapproval.

[redacted]

Date

CERTIFICATIONS (Continued)

SIGNATURE:

[redacted]

COMPETITION ADVOCATE
SIGNATURE:

[redacted]

SECTION 13. APPROVALS

HEAD OF THE CONTRACTING ACTIVITY
SIGNATURE:

[redacted]