JUSTIFICATION FOR AN EXCEPTION TO FAIR OPPORTUNITY
FAR Part 16.505

1. IDENTIFICATION OF THE AGENCY AND CONTRACTING ACTIVITY

Contracting Activity
U.S. Department of Labor
OASAM/Job Corps Acquisition Services
200 Constitution Avenue, NW Room N4643
Washington, DC 20210
ATTN: Jillian Matz

Customer Agency
U.S. Department of Labor
ETA/Office of Job Corps
200 Constitution Avenue, NW Room N4464
Washington, DC 20210
ATTN: Erin McGee

2. NATURE AND DESRIPTION OF THE ACTION BEING APPROVED:

This action is to obtain approval to award a sole-source, short-term, fixed price task order to LifeSkills Connection, Inc. for the continued operation of the Cascades Job Corps Center (JCC). It is anticipated that this requirement will be awarded as a task order issued against an existing indefinite delivery indefinite quantity (IDIQ) multiple award contract.

3. A DESCRIPTION OF THE SUPPLIES OR SERVICES REQUIRED TO MEET THE AGENCY'S NEEDS (Including the Estimated Value):

Operation of Cascades Job Corps Center

The Cascades Job Corps Center is a 24-hour, 7 days per week operation that provides essential residential (including food and shelter), medical, education, training, and career transition support to the students participating in the Job Corps program. The proposed short-term task order will enable the provision of these critical services through the continued operation of the Cascades Job Corps Center.

b. Estimated value including the base and any options:

Contractor	Title of Requirement	Period of Performance	Total Amount
LifeSkills Connection, Inc.	Cascades Job Corps Center	6/1/2026 - 5/31/2026	$12,459,775.00

4. IDENTIFICATION OF THE EXCEPTION AND RATIONALE:

FAR 16.505(b)(2)(B) – Only one awardee is capable of providing the services required at the level of quality required because the services ordered are unique or highly specialized.

This is an order placed against a task order issued against an existing indefinite delivery indefinite quantity (IDIQ) multiple award contract. There are seven (7) other contracts awarded

under the applicable multiple award. At this time, it is determined that the services required are unique given the nature of what is needed in order to ensure that there is no disruption to the Cascades Job Corps Center.

The purpose of this short-term task order is to permit the Government sufficient time to initiate and complete an open market competitive procurement for a five-year contract. The Employment and Training Administration (ETA) recognizes the importance of completing competitive procurements. However, there is a need for this short-term, sole-source task order to ensure continuity of services while ETA completes the competitive procurement and contract award process.

The contractor is the incumbent operator of the associated Job Corps center. Thus, the contractor is the only responsible source that can provide immediate services without disruption for the Job Corps center students. No other source can satisfy the agency's requirements. As the current operator, the contractor is well established in the community and has been the operator of the Job Corps center for approximately three (3) years. The contractor has established linkages and partnerships with various educational, civic, and employer partners in the surrounding communities, which facilitate the transition of a student from the Job Corps center into a full-time job, higher education, or the Armed Forces.

The incumbent contractor has a contract that is expiring on May 31, 2026. The Job Corps program requires an operator that can continue operating the Cascades Job Corps Center without disruption while it initiates and completes a competitive procurement process for the successor contract. The incumbent contractor is the only contractor who would be able to continue providing services to the Cascades Job Corps Center without disruption of services, which could include closure of the center. If the Cascades Job Corps Center were to close, each student would have to be provided transportation to return to their home of record or relocate to another center. Re-entry into the program for students who were transported home would be problematic and very costly. Students' academic and career technical training would be interrupted and irreparably affected while the student waits at home for the center to reopen. Training could also be interrupted adversely affected as the student establishes a good working relationship at another center. Moreover, the U.S. Department of Labor would incur additional expenses for a caretaker contract, which would be required to safeguard Government-owned facilities while the center is closed.

In addition to hiring, training, and retraining staff, there are many subcontract arrangements under an existing Job Corps center operator's contract. The contractor is required to provide services including food, clothing, security, transportation, janitorial, and ground maintenance. Awarding a short-term task order to other than the incumbent contractor would require the new contractor to quickly enter into many new subcontracts, which could result in additional disruption of services provided to the students of the identified Job Corps center.

Uninterrupted operation of the Center by the contractor during the procurement process would ensure that the young adults currently housed at the Cascades Job Corps Center could depend on

the center to provide for their comprehensive needs (including shelter and food) while they progress toward obtaining academic and career technical skills to secure employment.

5. DETERMINATION BY THE CONTRACTING OFFICER THAT THE ANTICIPATED COST TO THE GOVERNMENT WILL BE FAIR AND REASONABLE:

The estimated cost for operating the Center was developed by the Employment and Training Administration's Office of Job Corps and was compared to the average monthly contract costs for the most recent Center operations, outreach/admissions, and career transition services contract performance period, to ensure fair and reasonable costs. The proposed short-term task order will have almost the same terms and conditions for servicing the Job Corps Center as the current contract/expiring contract. In addition, the Contracting Officer will require the contractor to submit a cost proposal for the intended sole-source task order. The Contracting Officer anticipates that the contractor will submit a proposal commensurate with the rates that are in the current, incumbent contract. However, the Contracting Officer will conduct a cost analysis of the proposal and will negotiate the costs, to include a fixed fee.

6. ANY OTHER FACTS SUPPORTING THE JUSTIFICATION:

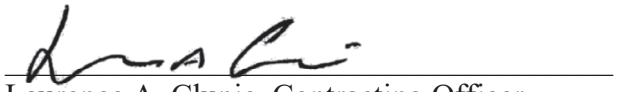
No additional facts.

7. A STATEMENT OF ACTIONS, IF ANY, THE AGENCY MAY TAKE TO REMOVE OR OVERCOME ANY BARRIERS THAT LED TO THE EXCEPTION TO FAIR OPPORTUNITY:

The Job Corps Acquisition Services (JCAS) will continue to work with the Office of Job Corps to competitively procure the new long-term succeeding contract for the Cascades Job Corps Center. The solicitation will be issued in the fourth quarter of Fiscal Year 2026, and JCAS anticipates making an award prior to the expiration of the task order (May 31, 2027).

8. CONTRACTING OFFICER'S CERTIFICATION:

I certify this justification is accurate and complete to the best of my knowledge and belief.



5/27/2026

Laurence A. Clunie, Contracting Officer — Date

9. TECHNICAL CERTIFICATION:

The program/technical official further certifies that no conflict of interest exists in awarding a sole source contract to the contractor identified herein.

I hereby certify that the supporting data, which is the responsibility of the technical personnel and forms the basis for this justification, is complete and accurate.

MILAGROS STEELE Digitally signed by MILAGROS STEELE Date: 2026.05.28 09:19:31 -07'00'

5/28/2026

Milagros Steele, Job Corps Regional Director — Date

10. WRITTEN DETERMINATION BY THE APPROVING OFFICIAL THAT ONE OF THE CIRCUMSTANCES APPLIES TO THE ORDER

Amanda Woodard Digitally signed by Amanda Woodard Date: 2026.05.29 11:39:31 -04'00'

Ryan Chandler — Date
Advocate for Competition
(for actions over $900,000 but not exceeding $20 million)