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	☒ Acquisition Management ☐ Foreign Service Institute ☐ Office of Foreign Missions ☐ U.S. Mission to the United Nations ☐ Overseas Post
Requiring Activity	The Bureau of Personnel and Training, Talent Acquisitions, Board of Examiners (PERT/TAC/BEX) - Foreign Service Test Administration

SECTION 2: NATURE AND/OR DESCRIPTION OF THE ACTION BEING APPROVED

Approval is requested to solicit and award, on a sole-source basis, a bridge contract to the incumbent contractor, NCS Pearson, Inc. (PearsonVUE), located at 5601 Green Valley DR Minneapolis, Minnesota 55437-1099, to provide continued test administration services described in Section 3 on behalf of the Requiring Activity.

The existing contract was modified through Modification P00026 on December 16, 2025, extending the period of performance through June 09, 2026, in the amount of [redacted] Accordingly, June 09, 2026, is the final date on which authority may be exercised under the current contract.

This bridge action will ensure uninterrupted mission support while the Government completes a full and open competition for the follow-on requirement. The anticipated contract type is firm-fixed-price.

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

The contractor shall provide continuous administering and delivering of validation of legally and professionally validated written examinations used as the initial screening tool in the selection of qualified candidates for Foreign Service employment, including Foreign Service Officers and Foreign Service Specialists.

These services are mission-critical and directly support the requirements of the Foreign Service Act of 1980, as amended, which authorizes the Secretary of State to prescribe written and other examinations for appointment to the U.S. Foreign Service. This acquisition supports the delivery

of secure computer-based testing instruments essential to identifying qualified candidates for diplomatic service worldwide.

Any lapse in services would result in:

- Disruption of scheduled Foreign Service Officer Test (FSOT), Foreign Service Specialists Test (FSST), the Consular Fellows Program Test (CFPT), the Diplomatic Technology Officer Test (DTOT), and Diplomatic Security Test (DST) and assessment cycles
- Delay test scoring and producing reports
- Delays in recruiting and processing qualified candidates for critical positions
- Adverse impacts to staffing pipelines for diplomatic, security, and technical roles
- Reduced mission readiness affecting worldwide diplomatic operations

[redacted]

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 6.103 and substantiated by the following:

☒ FAR 6.103-2 – Unusual and compelling urgency.

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

The incumbent contractor, NCS Pearson, Inc. (PearsonVUE), is uniquely qualified to provide the required services during the bridge period for the following reasons:

1. PearsonVUE possesses the operational capacity, technical infrastructure, and industry expertise necessary to support large-scale Foreign Service testing programs while providing the responsiveness and individualized support required for mission-critical government operations.

[redacted]

[redacted]

[redacted]

6. PearsonVUE maintains established working relationships with the Board of Examiners (BEX) and Department stakeholders, providing ongoing coordination and support for testing operations, program administration, and modernization efforts.

[redacted]

8. Transitioning to a new contractor during the bridge period would present significant operational risks, including disruption to testing schedules, delays in candidate processing, potential impacts to test security, and interruption of mission-critical Foreign Service hiring activities. Immediate continuity of services is required, and no other source could reasonably assume performance within the required timeframe without substantial disruption.

Accordingly, only the incumbent contractor can satisfy the Government's urgent requirement during the bridge period.

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 5.2 AND, IF NOT, WHICH EXCEPTION UNDER FAR 5.201 APPLIES

This bridge action is limited in duration and scope and is intended solely to maintain continuity of services while the competitive follow-on acquisition is completed.

The Government is actively pursuing a full and open competition for the permanent requirement, including development of the acquisition strategy, market research, and preparation of the solicitation documentation.

This bridge contract does not replace or delay competition but enables it.

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

[redacted]

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

Market research for the long-term requirement has been conducted/is ongoing in accordance with Federal Acquisition Regulation (FAR) Parts 10 (Market Research). While other potential sources are expected to compete for the follow-on contract, no one can assume performance within the limited timeframe required for this bridge action without unacceptable risk to mission continuity.

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

The original contract was competed when originally solicited. Failure to award this bridge contract would result in:

- Interruption of critical services
- Potential degradation of mission performance
- Increased cost and risk associated with emergency acquisition actions
- Loss of operational continuity

The bridge period will be kept to the minimum duration necessary to complete the competitive procurement.

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

A Request for Information (RFI) was posted on SAM.gov to acquire a list of potentially capable contractors for Foreign Service Test Administration (FSTA) services against 19AQMM-26-RFI-1001. The Program Office (PO) was asked to review the capability statements from the market research results to further narrow the number of sources to the highest qualified companies that can meet their requirements. Through analysis of the PO's review, the CO has determined to solicit the requirement under North American Industry Classification System (NAICS) 541910 – Marketing Research and Public Opinion Polling.

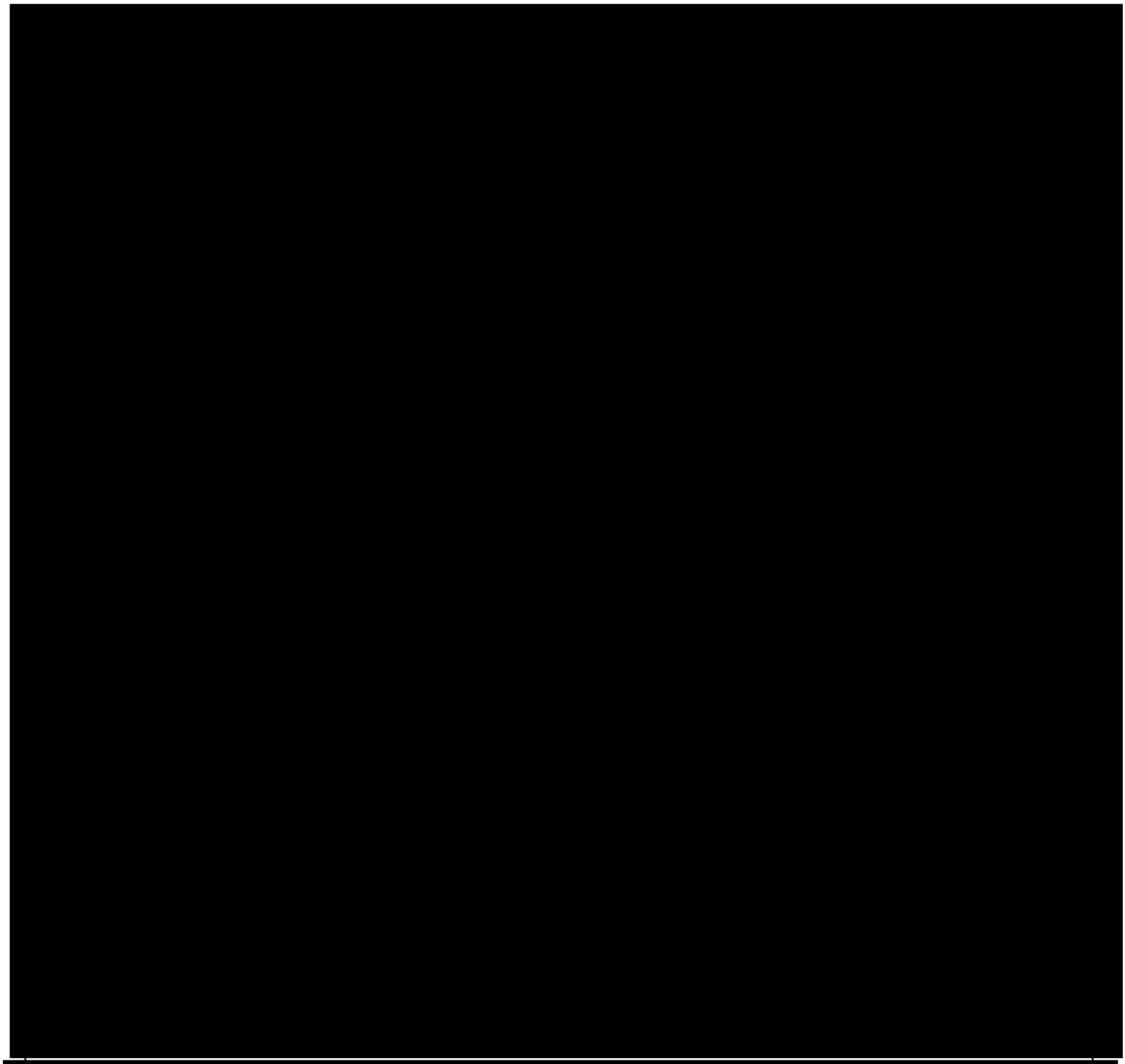
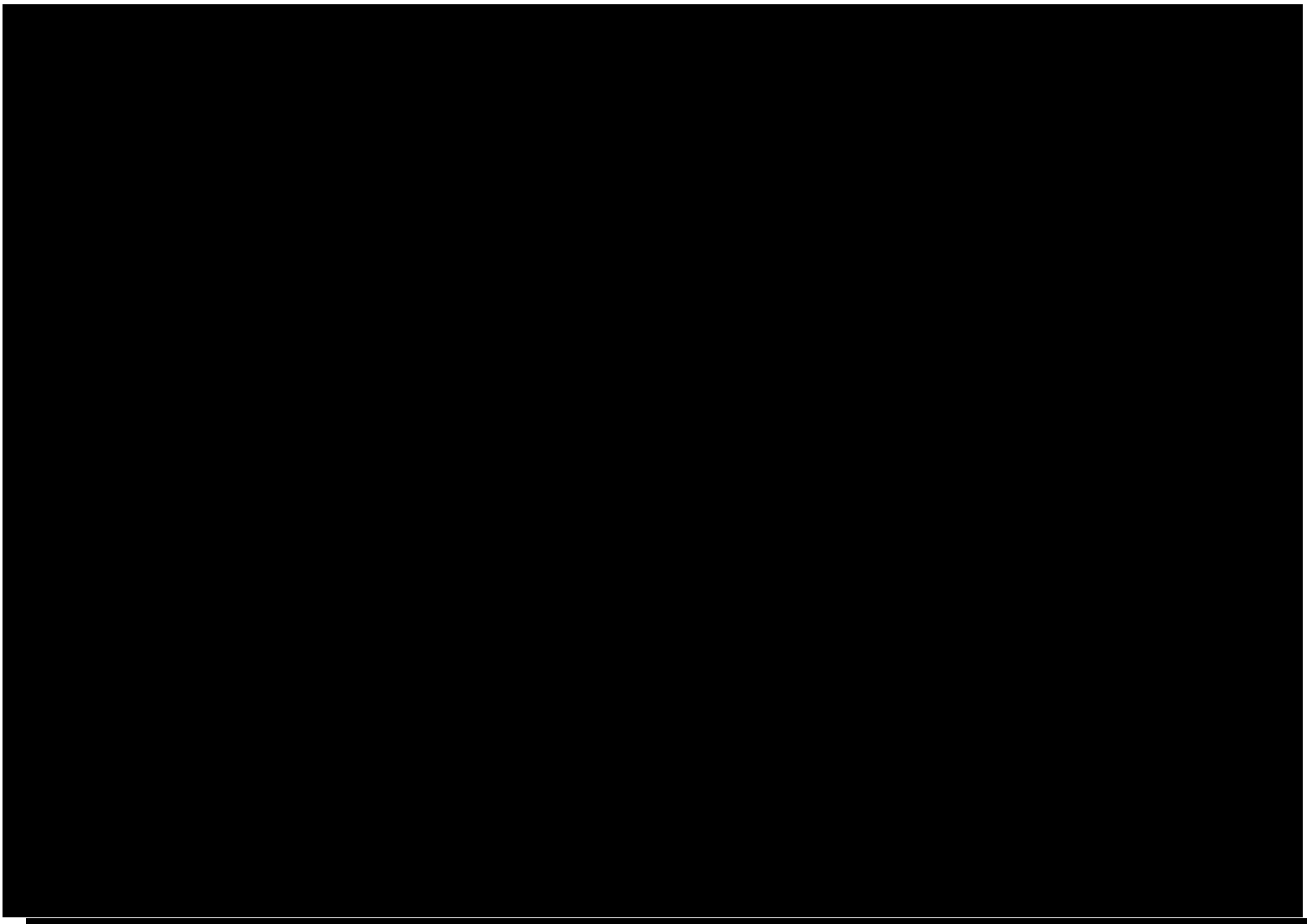
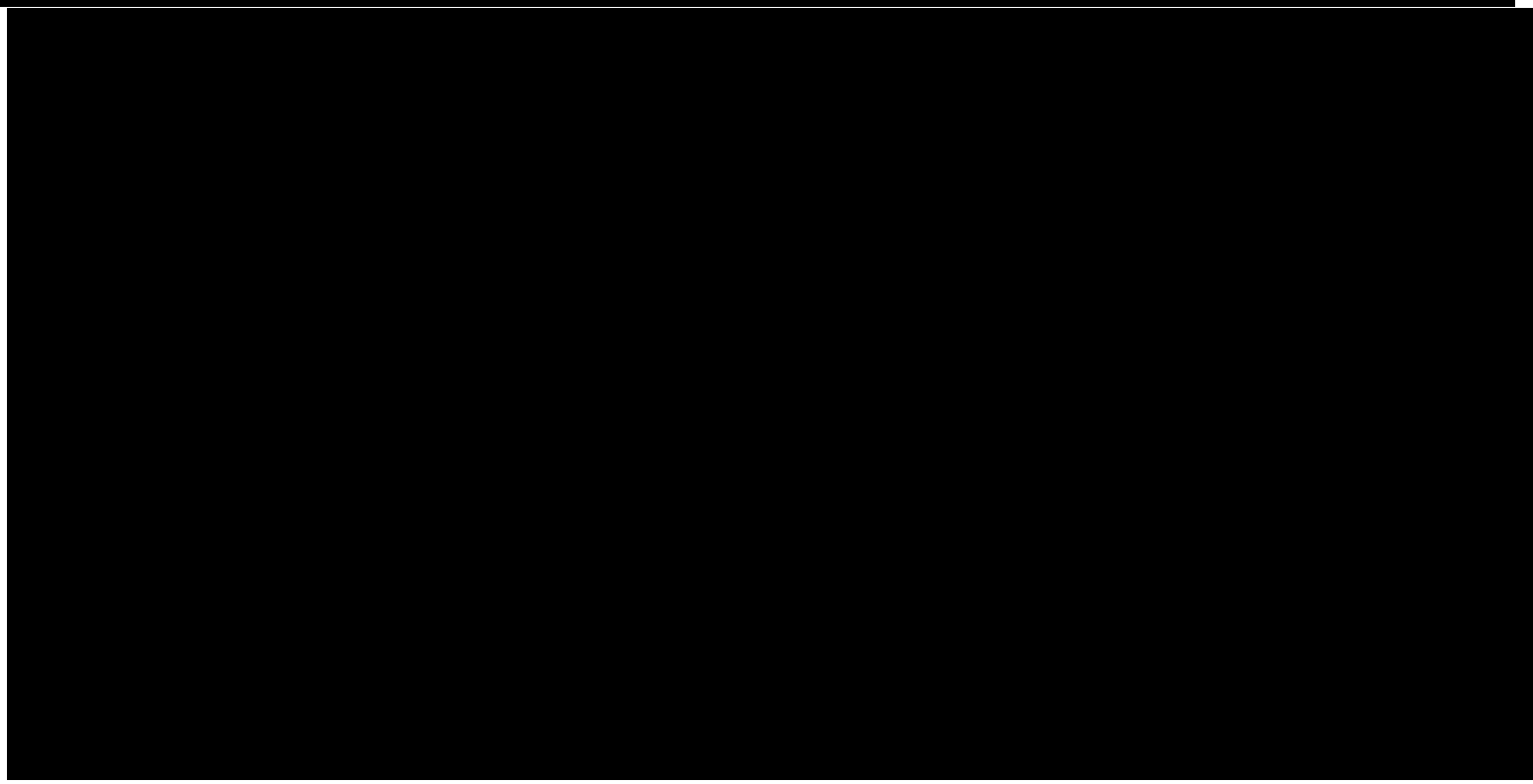
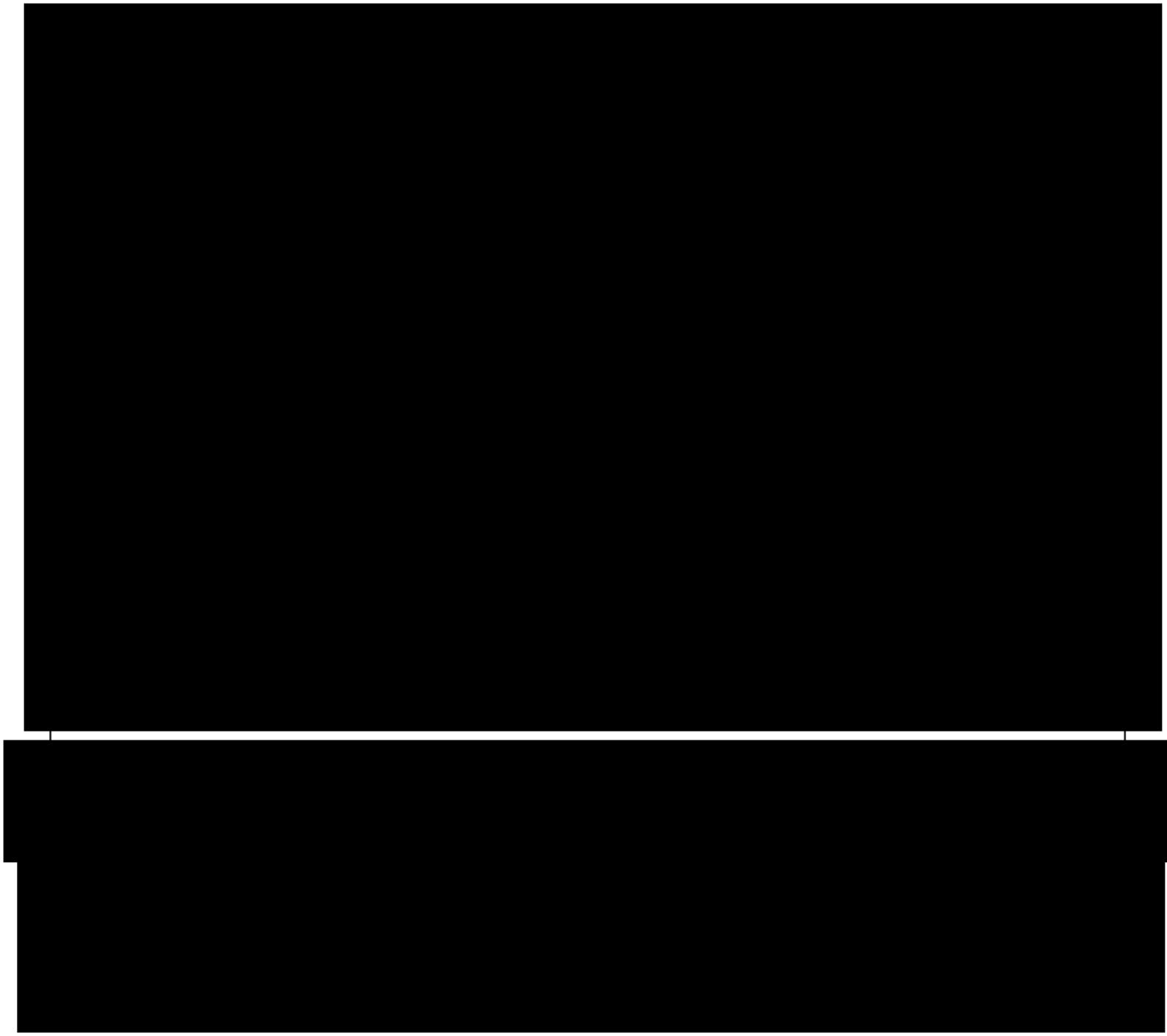
[redacted]

[redacted]

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

The Government is taking the following actions to ensure full and open competition for the follow-on requirement:

- Finalizing acquisition planning and strategy
- Completing market research
- Preparing a competitive solicitation
- Establishing realistic timeliness to prevent future bridge actions

The bridge contract is a one-time, limited action to support competition and not replace it.

The estimated date of the new contract award for the recompete acquisition is June 09, 2027.