

## **FEDERAL SUPPLY SCHEDULE LIMITED SOURCE JUSTIFICATION**

**TO:** Shannon White-Benson, United States Agency for International Development,  
Office of Acquisition Termination (USAID/OAT) Supervisory Contracting Officer

**FROM:** Christopher Colbow, United States Agency for International Development,  
Operations Team (USAID/OPS), FOIA Public Liaison

**SUBJECT:** Federal Supply Schedule Sole Source Justification - FOIAXpress Licenses and  
Technical Support services to Opexus dba Casepoint

**(1) This document sets forth the facts and rationale justifying the use of Federal Supply Schedule Sole Source Justification, in accordance with Revolutionary Federal Acquisition Regulation (RFO FAR) Overhaul Part 8.401(b), General Services Administration Acquisition Manual (GSAM) 538.7104-3.**

This document sets forth the facts and rationale for a sole source justification to purchase FOIAXpress Licenses and Technical Support, in accordance with **GSAM 538.7104-3**. This procurement supports key operational functions within the USAID Operations Team (OPS).

**(2) The nature and/or description of the action being approved and the rationale for a sole source:**

This request is to approve a sole source Task Order for FOIAXpress Licenses and Technical Support services to Opexus dba Casepoint (UEI: NEFMH93JD5J6). The Task Order will have a base period of performance of the date of award through September 30, 2027, and (3) three 6-month option periods (2 option periods, plus the priced 52.217-8 extension) are anticipated. The total estimated price for base and all options is: \$1,301,478.45. FOIAXpress is a Commercial Off-the-Shelf (COTS) technology product built by Casepoint and is patent-protected and proprietary. There are no authorized resellers of FOIAXpress and the maintenance support services can only be provided by Casepoint.

The current contract (7200AA24C00107 which is a Federal Supply Schedule award [subject to RFO FAR Part 8.4](#)) for enterprise license and product customizations was initially awarded in September 2024 and was subsequently extended for six months in September 2025 to March 29, 2026. In June, 2026, a justification was done, allowing the contract to be extended by 6 months to September 28, 2026, and the TEC was increased from \$795,293.75 to \$1,055,293.75. In sum, the contract has completed its lifecycle and will end on September 29, 2026. The agency

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has a continued need for FOIA services, hence the need for a new Task Order to prevent any lapse in services.

As documented below, changes in Agency needs and the specialized software and technical support required from the contractor necessitates this sole source justification.

A sole source justification is necessary for FOIAXpress Licenses and Technical Support due to several critical factors. The Agency's system has been extensively customized and integrated with collaboration tools essential for processing FOIA requests. Transitioning to a new system would demand significant time and resources for implementation and staff retraining, and would risk operational disruptions. These challenges, coupled with limited fully-trained FOIA staff, would prevent the Agency from meeting FOIA regulatory deadlines and other requirements, jeopardizing compliance and efficiency. Given these considerations, extending the current sole source task order ensures continuity, leverages existing investments, and supports the Agency's mission to effectively manage FOIA requests.

Additionally, as USAID continues its closeout and transition process, this new Task Order represents the minimum period necessary to ensure an orderly transition of FOIA operation to a successor entity. If approved, this will ensure oversight and program management continuity during the transition.

Further, switching to a new FOIA processing system would introduce significant risks, including a learning curve that could impede our FOIA operations during a critical period of high-request volume and backlogs. FOIAXpress has been tailored to our specific needs over the years, and the extensive, specialized training and ongoing support provided by Casepoint ensure minimal disruption and continued efficiency in our FOIA processing.

Maintaining FOIAXpress avoids the substantial costs of procuring, implementing, and transitioning to a new system. These costs include not only financial outlays but also the time and resources required for staff retraining and process re-engineering. By continuing with FOIAXpress, we leverage our existing investment and ensure the optimal use of agency resources for FOIA compliance and service delivery.

FOIAXpress also serves as the official repository for all of USAID's FOIA and Privacy Act (PA) requests, as well as some Mandatory Declassification Reviews and Congressional records. Operating from the same system is essential to maintain the integrity of our annual FOIA report to the Department of Justice.

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Given FOIAXpress's proven track record, comprehensive features, integration capabilities, and the risks associated with transitioning to a new system, we firmly believe that continuing our partnership with Casepoint through a sole source mechanism is in the best interest of the Agency. This approach will ensure continuity, efficiency, and compliance in our FOIA operations, ultimately serving the public more effectively.

**(3) Description of supplies or services required to meet the Agency's needs and estimated value:**

FOIAXpress, developed and supported by Casepoint, is a Software-as-a-Service (SaaS) cloud web-based application that has been USAID's case management system since 2007. This system is currently in use by over 150 public institutions and more than 100,000 government users across the United States, showcasing its reliability and effectiveness. Its widespread adoption by numerous federal agencies indicates its proven capability to meet the unique needs of government operations at scale.

FOIAXpress is a comprehensive, cloud-ready, and FedRAMP certified system, ensuring robust security measures compliant with government standards. It integrates seamlessly with existing USAID databases and document management systems, which is crucial for efficiently accessing and managing large volumes of FOIA data. The system also supports integration with third-party sites and applications such as the National FOIA portal, Pay.gov, and Login.gov, fulfilling key agency requirements.

FOIAXpress offers a suite of specialized features tailored to FOIA processing, including electronic document management, advanced redaction capabilities, automated deduplication, and detailed reporting tools. These features significantly enhance USAID's ability to handle a high volume of FOIA requests while maintaining compliance with legal deadlines. The system's Public Access Link (PAL) web portal provides a secure interface for public interaction, further streamlining the FOIA process.

FOIAXpress provides the following required services that enable efficient processing of FOIA and PA requests, in addition to facilitating the reduction of backlogged FOIA requests:

- The system manages the entire lifecycle of a FOIA and/or PA request—to include FOIA appeals, consultations, and litigation—from the initial request to the final delivery of records. The system includes components such as auto-generated case number tracking, correspondence management, document management, fee/payment management, document review and redaction, and reporting.

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- The system includes a public-facing web portal that provides efficient and secure communication between USAID and the public. It also allows individuals to submit and track the status of FOIA and PA requests electronically. The system is Fed-RAMP approved for cloud-hosting to ensure timely software upgrades and patches, integrity of reporting and data reliability, improved functionality, easier and more efficient access, and committed technical support. With regard to reporting, the Department of Justice establishes statistical and reporting mandates to ensure FOIA compliance and the system meets all compliance requirements to ensure accurate reporting.
- The system has full interoperability with the requirements outlined in the Executive Office of the President's Office of Management and Budget (OMB) memorandum M-19-10, Guidance for Achieving Interoperability with the National Freedom of Information Act Portal on FOIA.gov, to connect to the National FOIA Portal. This portal is a requirement of the FOIA Improvement Act of 2016. It is a central, online request portal that allows a member of the public to submit a request for records under the FOIA to any federal agency from a single website.
- The system has the requisite technology to ensure quick file filtering, clustering, deduplication, ranking and categorizing of responsive content in large volumes of emails, attachments, and various file types.

This request is to proceed with a sole source Task Order under GSA MAS No. [GS-35F-576GA](#) with a period of performance of the date of award through September 30, 2027 and (3) three 6-month option periods (2 option periods, plus the priced 52.217-8 extension). The total estimated price of the base and all options is estimated at \$1,301,478.45. All services to be provided and prices to be provided will be under the contractor's awarded GSA MAS contract.

**(4) Statutory authority permitting other than full and open competition:**

The action is accomplished under GSAM 538.71— Federal Supply Schedule Ordering Procedures, specifically GSAM 538.7104-3, Sole Source Justifications, provides the relevant authority for this J&A. 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.

FOIAXpress is a COTS technology product built by Casepoint and is patent-protected and proprietary. There are no authorized resellers of the FOIAXpress and the maintenance support services can only be provided by Casepoint.

**(5) A determination by the ordering activity contracting officer that the order represents the best value consistent with GSAM 538.71:**

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The new work will be priced using Firm-Fixed-Price (FFP). USAID will seek additional discounts during negotiations and the Contracting Officer will make a determination that the total price is fair and reasonable and that the order represents the best value consistent with GSAM 538.71 prior to proceeding to award.

**(6) A description of the market research conducted among schedule holders and the results, or a statement of the reason market research was not conducted:**

The FOIAXpress software is proprietary, and maintenance for this software is only available from Casepoint. OPS confirmed that there are no resellers in the market for either the software or maintenance services. Casepoint is the only source available that can meet this requirement. Proceeding with this award is in the best interest of the U.S. government. While alternatives to FOIAXpress were identified through market research, none offer the combination of extensive features and FedRAMP certification that FOIAXpress provides, along with the ability to seamlessly transfer current and legacy FOIA requests. FOIAXpress ensures compliance with rigorous federal security standards through its FedRAMP certification. It offers comprehensive case management that covers every step of the FOIA request lifecycle, including automation for receipt, tracking, redaction, and response, significantly streamlining processes and reducing administrative workload. Its advanced redaction capabilities, featuring AI-assisted tools, quickly and accurately identify sensitive information, minimizing manual effort and errors. The built-in Public Access Link (PAL) enhances transparency and user experience by allowing requesters to submit and track requests online and make payments directly through the portal. Additionally, robust reporting and analytics provide automated reports that help agencies monitor performance and ensure compliance with reporting requirements. FOIAXpress also integrates with third-party applications such as the national FOIA portal and Pay.gov. Moreover, agency staff benefit from over a decade of experience with FOIAXpress-specific processes and systems.

**(7) Any other facts supporting the justification:**

FOIAXpress was chosen as the corporate solution for processing FOIA requests and has been in use at USAID for approximately 19 years and it meets USAID's requirements. FOIAXpress is also the sole system in use by other federal entities such as the Department of State, which facilitates progress on FOIA requests that cover both portfolios.

USAID is extremely reliant on FOIAXpress to meet its FOIA processing requirements, which currently consists of the intake and full processing of more than 900 FOIA requests annually and a repository of more than 8,500 completed FOIA requests—including associated documents

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pertaining to PII, sensitive procurement information, and/or litigation—for records management purposes. FOIAXpress is fully integrated with USAID systems, and it provides the necessary data for annual Department of Justice reporting requirements. A decision to move to a different FOIA processing tool would be very disruptive to USAID's mission and it would not be cost effective to taxpayers. Deploying a new system would require a significant investment as described and incur additional resources and time to incorporate and train staff on a new system.

The Agency is currently in the process of winding down its FOIA operations, which limits its capacity to process FOIA requests. This means that any transition to a new system would further strain limited resources, leading to potential delays in training, reduced processing capacity, and an increased risk of missing regulatory deadlines, ultimately compromising the Agency's ability to fulfill its FOIA obligations effectively.

Little to no risk of unsuccessful performance is anticipated for this award as Casepoint has a positive past performance record.

A new procurement would require extensive onboarding and clearance processing for dozens of staff, which is infeasible within the timeline of the Agency's transition. Only the incumbent can maintain seamless continuity of services under the current circumstances.

It is also important to note that The Guide for Exceptions to Competition Requiring a J&A (the J&A Guide) requires consultation with the Agency Competition Advocate. This position is currently vacant. Per [ADS 101.3.1.14 Bureau for Management \(M Bureau\) \(c\)\(1\)](#),

"The Director performs the functions of the Agency's Chief Acquisition Officer (CAO) and serves as the Senior Procurement Executive (SPE).... Specifically, the Director.....Ensures the use of full and open competition by establishing and updating as necessary policies, procedures, and practices to ensure that the Agency receives a sufficient number of sealed bids or competitive proposals from responsible sources to fulfill requirements at the lowest cost or best value."

Given the delegation of responsibilities described above, and because the ACA role is currently vacant, it is appropriate to seek SPE and CAO clearance on this J&A. The CAO clearance will serve as the ACA clearance required by the J&A Guide.

**(8) A statement of the actions, if any, the Agency may take to remove or overcome any barriers that led to the restricted consideration before any subsequent acquisition for the supplies or services is made:**

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As the Agency is undergoing an Administration-directed closeout, no subsequent actions are necessary following this award. It is anticipated that once awarded, administration of the Task Order will be handled by a successor entity.

**(9) Technical Certification:**

I certify that the technical statements included above, and which form a basis for the justification, are complete and accurate.

**CHRISTOPHER ALLEN  
COLBOW**

Digitally signed by CHRISTOPHER  
ALLEN COLBOW  
Date: 2026.08.20 13:53:14 -04'00'

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Christopher Colbow  
Technical Office Representative

Date

**(10) Contracting Officer Certification**

I have determined that, as described above, appropriately applies to this order and approve by signing below.

**Shannon MICHELLE White-  
Benson**

Digitally signed by Shannon MICHELLE  
White-Benson  
Date: 2026.08.20 15:31:03 -04'00'

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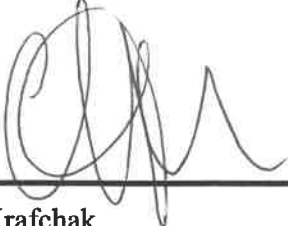
Shannon White-Benson  
Approving Official, Contracting Officer

Date

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**Internal Agency Clearances**

**1. GC Clearance**

  
\_\_\_\_\_  
Chris Krafchak  
General Counsel (GC)

  
\_\_\_\_\_  
Date

**Approving Official Determination:**

I have determined that, as described above, appropriately applies to this order and approve by signing below.

**2. Chief Acquisition Officer (CAO), Director of OAA, Agency Competition Advocate**

  
\_\_\_\_\_  
Matt Dickinson, Chief Acquisition Officer (CAO) and Director of OAA  
Date

  
\_\_\_\_\_  
Date

**Attachments:**

1. [Most Recent CPARS](#)
2. [Market Research](#)