

JUSTIFICATION AND APPROVAL  
FOR AN EXCEPTION TO FAIR OPPORTUNITY

1. Contracting Activity: Department of Veterans Affairs (VA)  
Office of Acquisition Operations  
Technology Acquisition Center  
260 Industrial Way West  
Eatontown, NJ 07724
  
2. Description of Action: The proposed action is for a 12-month Firm-Fixed Price Task Order (TO) for the Recertification Accounting & Tracking System (RATS). This TO is proposed to be awarded against Contract Number VA118-11-D-1005 under the Transformation Twenty-One Total Technology (T4) Contract.
  
3. Description of the Supplies or Services: The proposed action is for software development services for a onetime redesign of the current Microsoft Access 97 Recertification database utilized by the Department of Veterans Affairs (VA) Financial Services Center (FSC) and implementation of a new system, which will be called the Recertification Accounting & Tracking System (RATS). The core functionality of the current database will carry over into the new system, but will be enhanced to include tracking of 13 assignment types completed within the Recertification Division, improve employee accountability, establish audit history for actions taken within the system, and develop standard and ad-hoc user reports. The Contractor will also conduct system testing; conversion of old records to new system, integration of the RATS modules, post-deployment sustainment, and system/user documentation. The total estimated value of the proposed action is \$ [REDACTED]
  
4. Statutory Authority: The statutory authority permitting an exception to fair opportunity is Section 41 U.S.C. 4106(c) as implemented by the Federal Acquisition Regulation (FAR) Subpart 16.505(b)(2)(i)(C), entitled "The order must be issued on a sole-source basis in the interest of economy and efficiency because it is a logical follow-on to an order already issued under the contract, provided that all awardees were given a fair opportunity to be considered for the original order".
  
5. Rationale Supporting Use of Authority Cited Above: The proposed source for this action is Technatomy, Corporation, 3554 Chain Bridge Road, Suite 100, Fairfax, VA 22030. Awarding the proposed action as a logical follow-on provides significant value to the Government. The benefits of this follow-on from the Centralized Administrative Accounting Transaction System (CAATS) task order are; efficiencies leveraged from the software code of the CAATS system and compressed deployment schedule for the RATS deployment. The RATS software is needed by the Government as the current Microsoft Access system no longer meets the Government's requirements and must be replaced to avoid significant impacts on Veteran Benefits delivery.

The Government requires the development of RATS to provide a system that will funnel information to and from the Benefit Delivery Network (BDN) system as it pertains to return of funds from the Treasury. The current database used by the Recertification

## Logical Follow-on Centralized Administrative Accounting System

Division is critical to operations and is the only system utilized to process and reconcile credits and debits from the Treasury and return funds to Veterans and the Department of Veterans Affairs' appropriations. IT Specialists were unable to convert the Access database during the recent Windows 7 upgrade. The temporary solution was to move the database to reside on a virtual XP system so that Veterans Benefits Administration Financial Center (VBAFC) staff may still utilize it. However, the XP environments are currently unsupported and at high risk for failure. If the environment does fail, the VAFSC will need to revert to a manual process to process debits and credits from the Treasury. The development of the RATS is logically aligned with the current CAATS system that is utilized for finance and accounting activities. This system is module based and has functionality very similar to that needed for the reengineering of the RATS.

All the requirements in the RATS Performance Work Statement (PWS) have a coding base already built in CAATS. By awarding the current CAATS vendor this follow-on task order the Government can leverage the experience and system foundations already built within CAATS and modify it for the specific RATS functions. RATS would be deployed as a module to the CAATS system, rather than developing a new system to achieve the RATS functionality. Developing the RATS system as a CAATS module will allow efficiencies within the deployment schedule. Utilizing the CAATS software and contractor personnel allows reduced coding time, which will result in quicker deployment of software iterations. Also, utilizing the current Contractor leverages experience from previously established Veterans Benefits Administration (VBA) finance/accounting specifications designed in CAATS (for example audit trail history requirements). This understanding reduces the amount of rework that will be required to develop software to the unique accounting requirements of this effort. The current Graphical User Interface (GUI) in CAATS meets or exceeds the Government requirements and will not require the retraining of employees as they are familiar with utilizing the current tool's features. Awarding RATS as a logical follow-on to the CAATS effort will allow a new system to be built in less time, will prevent excessive rework and will utilize economies of scale.

6. Efforts to Obtain Competition: Market research was conducted, details of which are in the market research section of this document. In accordance with FAR 5.301 and 16.505(b)(2), this action will be synopsisized at award on the Federal Business Opportunities Page (FBO) and the justification will be made publicly available.

7. Actions to Increase Competition: There are no barriers to future competition. It is anticipated that future efforts for RATS will be issued on a competitive basis.

8. Market Research: The Government's technical experts reviewed sources that provided capabilities for similar work. It was determined that utilizing an already existing TO is the most efficient and suitable method of developing the RATS software. Utilizing the current CAATS software and contract personnel will allow the RATS functionality to be quickly deployed as a module to the current CAATS software build and will significantly reduce the risk to the Government. Based on the market research, only Technatomy Corporation, the incumbent contractor, possesses the technical expertise and experience specific to CAATS, which is necessary to build RATS.

## Logical Follow-on Centralized Administrative Accounting System

9. Other Facts: If the RATS software cannot be quickly deployed and the current database fails, which is highly probable in the current unsupported environment, the VAFSC will have to utilize a manual process. This will result in the Government processing over 11,000 monthly individual actions manually. This manual input would increase the level of effort for the Government, and would cause delays and inaccuracies in the payments delivered to Veterans from the Treasury.

Logical Follow-on Centralized Administrative Accounting System

10. Technical and Requirements Certification: I certify that the supporting data under my cognizance, which are included in this justification, are accurate and complete to the best of my knowledge and belief.

Name

Date: \_\_\_\_\_

Title

Signature: \_\_\_\_\_

11. Fair and Reasonable Cost Determination: I hereby determine that the anticipated price to the Government for this contract action will be fair and reasonable based upon the Independent Government Cost Estimate and Price Analysis.

Name

Date: \_\_\_\_\_

Procuring Contracting Officer

Signature: \_\_\_\_\_

12. Procuring Contracting Officer Certification: I certify that this justification is accurate and complete to the best of my knowledge and belief. As this contract action does not exceed \$650,000, the certification below required by FAR 16.505(b) (2) (ii) (C) (1) serves as approval.

Name

Date: \_\_\_\_\_

Procuring Contracting Officer

Signature: \_\_\_\_\_