



**LIMITED SOURCE JUSTIFICATION
FOR A LIMITED SOURCE AWARD UNDER A FEDERAL SUPPLY SCHEDULE**

- 1. Contracting Activity:** Department of Veterans Affairs (VA)
Office of Acquisition Operations (OAO)
Strategic Acquisition Center-Frederick (SAC-F)
321 Ballenger Center Drive, Suite 125
Frederick, MD 21703
- 2. Description of Action:** The proposed action is for a limited source, six (6) month General Services Administration (GSA) task order. The proposed contract type is a firm-fixed price task order with the option for two one (1) month option periods. This effort is being conducted under the authority of the Multiple Award Schedule Program; the proposed effort will be awarded under the General Services Administration (GSA) Federal Supply Schedule (FSS) Contract Number GS-00F-0005W, to DOMA Technologies, LLC., 2875 Sabre Street, Suite 500, Virginia Beach, VA 23452-7385.
- 3. Description of the Services:** The proposed action is to provide private medical record retrieval and scanning services to the Department of Veterans Affairs (VA) through the Veterans Benefits Administration (VBA) which administers the Compensation Service (CS) and Pension and Fiduciary Service (P&F) to reduce the amount of time spent waiting for a physician to send the medical records to VBA from 40 days to 7-10 days. The secondary purpose of this requirement is to determine if the VA pilot sites participating in the study have an increase in time available for other VA claim work. The contractor shall first receive signed and dated VA release forms to send to Private Health Providers (PHPs). The contractor shall follow up with the PHPs until copies of medical records from the PHP's offices are received; notification has been provided that the PHP will not be sending records for various reasons; or verification has been received that the PHP no longer exists. The contractor will also upload the electronic documents via a secure batch file import to the Veterans Benefits Administration (VBA) Virtual VA database system and make the electronic copies of the medical records available for VBA employees, on a secure contractor website for download into a VBA database system.
- 4. Authority:** Federal Acquisition Regulation (FAR) Part 8.405-6(a)(1)(i)(C). In the interest of economy and efficiency, the new work is a logical follow-on to an original Federal Supply Schedule order that was placed in accordance with the applicable Federal Supply Schedule ordering procedures. The original Blanket Purchase Agreement (BPA) order, Number VA798-11-BP-0019, for the retrieval and scanning of private medical records was awarded to DOMA Technologies,

LLC. A Federal Supply Schedule competitive solicitation, Request for Quote (RFQ) Number VA798-11-RQ-0174, was issued for full and open competition on July 21, 2011.

5. Rationale Supporting Use of Authority Cited Above: The original Blanket Purchase Agreement (BPA) order, Number VA798-11-BP-0019, for the retrieval and scanning of private medical records was awarded to DOMA Technologies .

The period of performance was September 02, 2011 through September 01, 2012, with two six (6) month option periods, for an ultimate completion date of September 01, 2013. A modification (IAW FAR 52. 217-8) to extend the period of performance from September 02, 2013 to March 01, 2014 was executed in order to continue current services. The proposed source is DOMA Technologies, LLC. 2875 Sabre Street, Suite 500, Virginia Beach, VA 23452-7385.

The Department of Veterans Affairs (VA) through the Veterans Benefits Administration (VBA) administers the Compensation Service (CS) and Pension and Fiduciary Service (P&F) for benefits to Veterans, their dependents, and their survivors. Entitlement determinations for disability compensations claims and disability pension claims are made by VBA Rating Veterans Service Representatives (RVSRs) working in VA Regional Offices (VAROs) across the country. In order to warrant a VA examination, private medical records are needed to establish continuity or sometimes can be used to make a final determination. DOMA Technologies has been under contract with the VA for the medical record retrieval from PHPs and scanning of these medical records since 2011. They have worked very closely with the technical and functional resources in the VA and gained significant knowledge of the VBA Virtual VA system. DOMA has also established electronic copies of the medical records available for VBA employees on a secure website for download into the VBA database system.

As a result of market research (see paragraph 8. Below), there may be other vendors that possibly could perform the tasks in the statement of work (SOW), although none of them are currently capable to immediately start performance due to unfamiliarity with VA processes/VBA database systems and not having the infrastructure already in place to perform the requirement. DOMA Technologies, LLC. is currently performing (on BPA No. VA798-11-BP-0019) and can continue to effectively perform for VBA through the end of the solicitation for the national PMR contract. The national PMR contract will be competitively awarded (reference paragraph 6). If another vendor is selected, additional risk would be incurred as the new contractor's staff may not fully understand the intent and context of the VBA VA database system, which will cause VBA to train both the new contractor for this short effort and potentially a new contractor for the national contract in a short period of time. Such a series of events will delay operations and negatively impact the processing of Veteran's claims, which are already at a significant backlog. If the above should occur, this would be an

unacceptable delay, as well as if the Contracting Officer should fail to execute this sole source procurement. Furthermore, another source would require a steep learning curve in addition to trying to provide support to VBA in reducing the amount of time spent waiting for PHP's to send the medical records.

6. Efforts to Obtain Competition: This action is a bridge contract to allow SAC-F to solicit a larger contract that will cover national needs. In accordance with FAR 5.301 and 8.405-6(a)(2), this action will be synopsisized at award on the Federal Business Opportunities (FBO) website and the justification will be made publicly available. Market research was conducted, details of which are in the market research section of this document. This effort did not yield any additional sources that can meet the Government's requirements. As mentioned above, any delay in service will delay operations and negatively impact the processing of Veteran's claims, which are already at a significant backlog, and if backlog should occur, this would result in an unacceptable delay. There is no competition anticipated for this acquisition, although competition is anticipated for the larger contract that is currently underway. The National PMR requirement will be competitively solicited.

7. Actions to Increase Competition: No barriers to future competition are anticipated. A competitive contract vehicle is anticipated to be awarded by September 01, 2014 and future acquisitions will be awarded on a competitive basis. Moreover, any source other than DOMA Technologies would still require time to learn what is required for this effort before they could provide support. Is it in the Agency's best interest to proceed with the proposed acquisition strategy.

8. Market Research: Market research efforts were conducted via General Services Administration (GSA) eLibrary search to determine if competition was viable for this action. The search included Category 36-The Office, Imaging and Document Solution, Special Item Number (SIN) 51 504, Records Management Services, limited to Veteran Owned Small Businesses. As a result of this search, nineteen (19) vendors were found (including DOMA Technologies). While other sources had the general capabilities needed to perform the proposed effort, only DOMA Technologies possesses the technical expertise and experience to ensure VBA's requirements will be met without interruption while the SAC-F contracting office establishes a competitive new contract vehicle for the retrieval and scanning of private medical records. Any interruption, or break in service would result in an unacceptable delay from failure to use DOMA Technologies.

Additional market research was conducted on December 17, 2013 and January 8, 2014, via a FPDS search. The keywords searched included the phrases "Retrieval of Private Medical Records, Medical Records Retrieval,

and Claims Processing". Five or more results were found for each keyword - including results for DOMA Technologies.

9. Other Facts: None

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: Hanna Buchan

Date: January 29, 2014

Title: Project Manager/COR

Signature: Hanna Buchan

11. Determination of Best Value: I hereby determine that the proposed contract action will represent the best value to the Government. GSA has already determined that the prices on the FSS contract are fair and reasonable. Further price analysis, to include an analysis of proposed level of effort and mix of labor, will be conducted and subsequent negotiations held as necessary. Additionally, price discounts will be sought. I certify that this justification is accurate and complete to the best of my knowledge.

Name: Thomas Brick

Date: 01/29/2014

Title: Contracting Officer

THOMAS J BRICK
Signature: 684857
Digitally signed by THOMAS J BRICK
DN: cn=THOMAS J BRICK, o=GSA
Date: 2014.01.29 13:21:08 -0700

12. Legal Sufficiency Certification: I have reviewed this justification and find it adequate to support a limited source award and deem it legally sufficient.

Name: Krishon Gill-Edmond

Date: Concur w/ Comment February 3, 2014

Title: Staff Attorney

Signature: Krishon Gill-Edmond

Subject: Retrieval & Scanning of Private Medical Records
Bridge (6mo base + 2 (1 month) options)

Approval

In my role as Contracting Activity Competition Advocate, based on the foregoing justification, I hereby approve the acquisition of (**see description from paragraph 2**), pursuant to the authority cited in paragraph 4 above, subject to availability of funds, and provided that the services herein described have otherwise been authorized for acquisition.

Date: 2/28/2014 Signature:

Michele Foster
Michele Foster
Competition Advocate
Head of the Contracting Activity