



JUSTIFICATION FOR EXCEPTION TO FAIR OPPORTUNITY

1. Contracting Activity:

Department of Veterans Affairs (VA)
Office of Acquisition Operations
Strategic Acquisition Center- Frederick (SAC-F)
321 Ballenger Center Drive, Suite 125
Frederick, MD 21703

2. Description of Action:

The proposed sole source action is for a modification to Labor-Hour Task Order (TO) VA119A-13-J-0182 issued under Tactical Program Management Support Services (TPMSS) Contract Number VA798-11-D-0121, in order to extend the period of performance. Currently, the TO is executing performance in the second option period which ends on May 26, 2016. The total value of the Task Order is \$5,869,029.68. This action will extend the period of performance through June 26, 2016, for an estimated total of \$164,526.40. The purpose of this modification is to continue to acquire Testing Support Services (TSS) for the Veterans Benefits Management System (VBMS) Program Management Office (PMO) from May 27, 2016 through June 26, 2016. The TO was awarded on September 26, 2013 and included one eight (8) month base period and two (2) twelve (12) month option periods.

This request is for a one time TO modification using FAR 52.217-8 "Option to Extend Services," for a period of performance extension of the PMO testing support services currently being provided in accordance with PWS sections 1.3 and 2.3. The total estimated value of the proposed action is \$164,526.40 with an estimated labor hours total of 2,240. This follow on effort is being conducted under the authority of the indefinite delivery vehicle contract VA798-11-0121, that has an ordering period ending September 26, 2016.

3. Description of Supplies or Services:

The services acquired under this TO provide VBMS a full range of testing support services, to include testing management support, defect management support, user solution acceptance testing and system user support. The testing support services assist the VBMS PMO with integration, deployments, management, operating and maintaining the standardized business processes and services of the Program Office.

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Testing support services includes:

- Supporting the division with analysis, validation, process improvements and lessons learned for the testing management process
- Completing regression testing in various test environments prior to release/patch to ensure that the VBMS system performs as intended prior to deploying to the production environment
- Preparing analyses and comparisons of alternative testing and business acceptance strategies for achieving VBMS objective
- Supporting the development of user acceptance test procedures, documents test cases, test scripts, use case specifications, customer acceptance forms and test completion report.

Testing support also includes testing execution, smoke testing execution (pre and/or post deployment), regression testing execution, integrated testing efforts (cross-trained in multiple applications), and facilitation remote and onsite testing efforts.

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 of this action is Interactive Process Technology, LLC, 17 Bowditch Road, Jamaica Plain, MA 02130-3002. Interactive Process Technology was awarded the original TO on a competitive basis under TMPSS. The services provided under this TO support the VBMS PMO and specifically, the VBMS release user acceptance testing (UAT). Extending the period of performance to June 26, 2016 will ensure continuity of these critical testing support services required for VA to be able to execute its mission.

The period leading up to, during, and after a UAT is a critical time in the VBMS release cycles. VBMS has Release 11.0 UAT scheduled for May 16, 2016 through May 27, 2016. Critical testing occurs both in Washington D.C. and Charleston SC, and dashboard reporting, creation of test accounts, metrics data gathering, identification of defects are a few of the critical elements that take place during the UAT. Additionally, immediately following the UAT hands-on

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testing, significant after-action activities are completed such as close-out reports, quality metrics data collections, lessons learned, and patch testing as needed for the defects identified, to name a few. The UAT is a time-sensitive process that requires the experience of the incumbent contractor more specifically because of the untimely end of the performance period during the UAT for Release 11.0. It is imperative that the current level of knowledge, familiarity with the system and processes remain in place during Release 11.0 UAT cycle to ensure the efficiency, effectiveness, and accuracy of identifying critical defects, anomalies and other critical and/or significant events/issues during testing and the incumbents ability to perform post-release defect testing and other related after-actions to minimize potential production delays.

Therefore, it is in the Government's best interest to extend the contract for 30-days to minimize the risk to the VBMS system and its users nationwide. The Government is not willing to assume the heightened risk of potential VBMS system down-time due to risks of unidentified release defects and critical anomalies that would impact the achievements made in reducing the claims backlog due to a disruption of the systems availability to users nationwide. The contractor, Interactive Process Technology, has been performing these services for the past 41 months to support the VBMS PMO and extending the period of performance to June 26, 2016 will ensure continuity of critical release testing support services required for VA to be able to execute its mission.

Additionally, there will be no travel funds needed during the extension period.

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.

Stanely Monickam

Date: March, 7 2016

Program Analyst -COR

Signature: _____

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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 on an analysis of the contractor's price to continue these services. The contractors priced labor hour rates will be verified to confirm that they do not exceed the established benchmark labor rates in the contractor's base ordering contract. The level of effort and the mix of labor proposed will be evaluated to determinate that the total price is reasonable for the effort. The Contracting Officer will seek additional price discounts of the established hourly labor rates on the base contract.

Tara Flores

Date: _____

Procuring Contracting Officer

Signature: _____

12. Procuring Contracting Officer Certification:

I hereby determine that FAR Subpart 16.505(b)(2)(i)(C) applies to this order as supported by the information found herein.

Robert A. Cody

Date: _____

Procuring Contracting Officer

Signature: _____