

**LIMITED SOURCES JUSTIFICATION  
FOR OTHER THAN FULL AND OPEN COMPETITION**

Upon the basis of the following justification, I hereby approve the issuance of the contractual action described below using other than full and open competition, pursuant to the authority cited herein.

**1. Contracting Activity:**

Department of Veterans Affairs  
Veterans Benefits Administration  
Office of Acquisition (20MA)  
Washington, DC 20006

**2. Nature of Action Being Approved:** This justification and approval sets forth the facts and request approval for the issuance of a contract with Duty First Consulting, LLC, 2650 Park Tower Drive, Suite 100, Vienna, VA 22180, pursuant to procedures IAW FAR 8.405-6 (a)(1)(i)(C). The intention is to award a logical follow-on Task Order to Duty First Consulting, LLC. The proposed contract base year is estimated at \$1,648,659.00; plus two option years. Total estimated contract value: \$4,991,673.00.

**3. Description of Service:** The contractor shall provide all resources necessary to expand and continue established marketing activities and current establish relationships with community over the past four years for the Veterans Benefits Administration (VBA), Benefits Assistance Service (BAS) to meet the Congressional mandate of 38 U.S.C. § 6301: "To proactively provide information to eligible veterans and dependents and providing them with timely and appropriate assistance in order to assist them in understanding benefits and services so that they may achieve a rapid social and economic readjustment to civilian life and obtain a higher standard of living for themselves and their dependents."

In order to ensure continuity and efficiency the marketing focus will continue and expand the work on said established external partnerships including NASCAR, United States Postal Service and Library Association. The contractor will also be required to update existing marketing products including videos and print materials that they have created and maintained that focus on eClaims and Fully Developed Claims and build on those established campaigns. The contractor is also required to expand on work already started for Veteran facing VA Breakthrough Initiative, Improve the Veteran Experience with the C&P Exam process and to expand to appeals. In addition, the contractor will be required to create new PSA's and complementary products for new, complementary VA campaigns including DBQ's, VA ID card that has a large Congressional focus and dependency claims.

**4. Statutory Authority:** The statutory authority of this justification is 41 U.S.C. Section 4106(c)(3). FAR 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 provided that the original order was placed in accordance with the applicable Federal Supply Schedule ordering procedures.

5. **Rationale Supporting Use of Authority Cited Above:** Any gap in the existing contract or failure to extend services with Duty First Consulting, LLC will result in delay or stoppage of work already started and loss of continuity costing the Government resources including time and money. In addition, choosing another vendor would result in duplication of effort, delay in deliverable of products in a timely manner and a significant learning curve. Based on these reasons it is more efficient and logical to continue work with Duty First. With constant negative press VA is rapidly trying to implement positive changes to meet the needs of our customers and any time lost to getting a new vendor acclimated will more than likely than not lead to increased scrutiny from Stakeholders for not fulfilling our duty to meet the Congressional mandate of 38 U.S.C. § 6301 to proactively provide information to eligible veterans and dependents and providing them with timely and appropriate assistance in order to assist them in understanding benefits and services so that they may achieve a rapid social and economic readjustment to civilian life and obtain a higher standard of living for themselves and their dependents.

Duty First Consulting, LLC, a SDVOSB, has provided this service to the Veterans Benefits Administration (VBA) for almost 4 years and has created progressive campaigns building a coordinated marketing approach for VBA. Specifically, because of the multi-layered internal and external communications campaigns included the development and implementation of the following materials and strategies:

- Creation of a new FDC and eClaims brand logo and tagline, along with a brand Style Guide
- More than 24 new marketing materials including an electronic and print partner toolkit (including English and Spanish versions of newsletter articles, promotional posters, fact sheets, a brochure, FAQs, advertisements, web banners, social media content, an FDC Web badge, and more)
- Radio and television PSAs and external partner messages featuring Veteran celebrity JR Martinez and NASCAR Champion Kurt Busch, who both donated time for the campaign
- A comprehensive internal and external FDC education series including 60 VA self-directed learning modules and training video products that required to work closely with multiple internal and external partners
- An FDC testimonial video featuring Veteran success stories about the FDC Program
- Partnership outreach to more than 300 VSOs and State Departments of Veterans Affairs (SDVA)
- Web and social media outreach
- Direct email messages to Veterans within VA's databases
- Direct outreach via a new partnership with NASCAR and affiliated race tracks

Their four years of working closely with VBA has resulted in an increase in FDC and electronic claims as well as eBenefits accounts. As a direct result of their work and despite no paid media, the campaign generated a 209 percent increase in Premium eBenefits account users during its first eight months. That campaign led to historic enrollment increases, monthly high visits to the site, and an overall site traffic increase of 38%. The PSA campaign generated more than \$11.3 million in earned media since its launch in 2013. More specifically, since the launch of the radio PSAs, spots have aired nearly 90,000 times across the country with total verified gross impressions of 151,748,150 and an estimated value of over \$8.9 million dollars in earned media as of September 2014. The television PSA has played over 17,650 times as of November 2014, resulting in 267,507,956 impressions and an earned media value of approximately \$2.4 million. Since the campaign's launch, the eBenefits promotional page has logged 1,000 page views every month and it has led to an increase in account users from 846,440 in 2011 to more than 5 million users today.

BAS worked with DFC to implement a multi-layered internal and external communications campaign that included the creation of more than 90 marketing materials including VSO and Congressional toolkits, PSA's, and a comprehensive informational video series. They also conducted partnership outreach to more than 300 VSOs and State Department of Veterans Affairs (SDVA) and created a three-pronged eBenefits training series targeted to stakeholders' needs, used to educate more than 650 key staff and partners. As a direct result of the FDC and eClaim ongoing campaigns they created VBA has seen a behavior and culture change in how claims are submitted from the Veteran. VA realized a 62% increase in FDCs filed from FY2014 to FY2015. VA has also seen a major shift in the percentage of Veterans choosing to file FDCs compared to traditional claims, as FDCs increased from accounting for only 2% of claims in FY2012 to over 55% in FY2015. More than 980,000 claims were filed as FDCs in 2015, and nearly half of all eClaims filed are now FDCs. The increase in FDC's has significantly impacted the goal of reducing the claim backlog. In addition, as more Veterans choose to file their FDC for disability compensation online through eBenefits, the number of eBenefits users has grown by more than 2 million users since the campaign began and is now at over 5.5 million. There have been nearly 275,000 video views on 32 FDC-related videos, hosted on VA's and VBA's YouTube channels. The PSAs have earned over \$7.2 million in earned media with over 55,942,566 and 298,886,900 TV and radio impressions, respectively.

Duty First is now currently creating and implementing a unique digital and web campaign in support of VA Secretary's Breakthrough Initiative, Improve the Veteran Experience with the C&P Exam process and they are needed to provide continuity and ensure there is no time lost or gaps in work. Any gaps in the campaign will cause the VA to lose momentum in improving the Veteran C&P exam experience.

Duty First has an expanded and unique relationship with stakeholders through VA that enables them to be collaborative where others would have to start from the beginning to build relationships. Acquiring a new contractor would require building new relationships and a real risk of losing existing long term external relationships necessary for VBA and VA to reach Veterans where they live and work. Duty First is required to continue with the charged mission and to ensure continuity of current activities that are currently tracked by the most Senior VA and VBA Leadership as well as Congress.

VBA has had a cooperative and professional relationship with the contractor for four years and their outcomes and the positive impact on VA and those we serve cannot be ignored. Requests for deliverables are done in a timely manner and this contractor has proved to be agile in a constantly changing environment meeting all requirements on time and exceed expectations with their work product.

In order to ensure continuity and efficiency over the next several years, the marketing focus will need to continue being provided by Duty First Consulting, LLC. They'll continue the work, as well as, maintain and expand their established external partnerships including: NASCAR, United States Postal Service, and the Library Association.

Duty First Consulting, LLC will be required to update existing marketing products including: videos and print materials that they've already created and maintained established campaigns on eClaims and Fully Developed Claims.

Duty First Consulting, LLC is also required to expand on work already started for Veteran facing VA Breakthrough Initiative, Improve the Veteran Experience with the C&P Exam process, which will expand to appeals. Due to the high profile nature of the marketing work and profound relationships already in place regarding this work, any gap in the existing contract, or failure to extend services, will result in delay or stoppage of work already started and loss of continuity costing the Government resources including time and money. In addition, choosing another vendor would result in duplication of effort, delay in deliverable of products in a timely manner and a significant learning curve.

6. **Description of Market Research:** Market research was conducted and the results are as follows:

GSA eLibrary: 13 SDVOSBs. 11 of the 13 SDVOSBs are CVE verified through VIP.

However any other contractor will have a large learning curve before they can be productive resulting in current work being delayed or cancelled, therefore it is more efficient and logical for Duty First to continue the work (See Section 5 above for more details). The proposed vendor is a certified Service Disabled, Veteran Owned Small Business on GSA schedule.

7. **Determination of Fair and Reasonable.** Reference FAR 8.401MAS, "GSA has already determined the prices of items under schedule contracts to be fair and reasonable." However, given the further direction of 8.401MAS the Government will negotiate for final pricing. We intend to issue a firm fixed priced document.
8. **Other Supporting Data:** None
9. **Other Interested Source:** None
10. **Future Barriers to Competition:** None

I certify that this justification is complete and accurate to the best of my knowledge and belief.

#### TECHNICAL/REQUIREMENTS COGNIZANCE

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Nancy Lansing,  
BAS Deputy Director/COR

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Date

**CONCUR**/Non-concur

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Vernon Mario Quilici  
VBA, Contract Specialist

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Date

**CONCUR**/Non-concur

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Megan Helm  
VBA, Supervisory Contracting Officer

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Date