

**LIMITED SOURCES JUSTIFICATION**

**ORDER >\$150,000**

**FAR PART 8.405-6**

**Acquisition Plan Action ID: VA701-16-AP-0141**

This acquisition is conducted under the authority of the Multiple Award Schedule Program. The material or service listed in paragraph 3 below is sole source, therefore, consideration of the number of contractors required by FAR Subpart 8.4 – Federal Supply Schedules, is precluded for the reasons indicated below.

**Restricted to the following source:** Edmond Scientific Company

Manufacturer/Contractor: Edmond Scientific Company

Manufacturer/Contractor POC & phone number: John Pitale (703)-766-3871

Mfgr/Contractor Address: 4000 Legato Road, Suite 1100, Fairfax, VA 22033

Dealer/Rep address/phone number: N/A

☒ The requested material or service represents the minimum requirements of the Government.

**(1) AGENCY AND CONTRACTING ACTIVITY:**

Department of Veterans Affairs

Program Contract Activity Central

6150 Oak Tree Boulevard, Suite 300

Independence, OH 44131

**(2) NATURE AND/OR DESCRIPTION OF ACTION BEING APPROVED:**

In accordance with FAR 8.405-6 (a)(i)(C) "In the interest of economy and efficiency" PCAC requests approval to use other than full and open competition (Sole Source) to award a one year, firm fixed priced, follow-on (previous contract GS35F0402R VA701-BP-0053 VA701-14-J-0043) contract to Edmond Scientific Company for continuous subject matter expert support for a wide range of security and privacy standard related activities both external and internal to VA. Estimated cost for this one year follow-on contract is \$1,039,190.00.

**(3)**

**(a) A DESCRIPTION OF THE SUPPLIES OR SERVICES REQUIRED TO MEET THE AGENCY'S NEED:**

The VHA, Office of Health Information (OHI), Standards & Interoperability (S&I) office requires a contractor to provide services for a wide range of security and privacy standard related activities both external and internal to VA. Core activities include support to VA's engagement with security standards and standards influencing organizations such as the American National Standards Institute (ANSI), ANSI International Committee for Information Technology Standards (INCITS), Health Level Seven (HL7), Internet Engineering Task Force (IETF), Integrating the Healthcare Enterprise (IHE), Liberty Alliance, International Standards Organization (ISO), National Institute of Standards and Technology (NIST), Organization for the Advancement of Structured Information Systems (OASIS), Object Management Group (OMG), and World Wide Web Consortium (W3C). In addition, the VA must integrate standards into its business processes and health information systems. In particular, standards affect the way that information is stored and used, and the protocols that must be observed to achieve interoperability between systems and business

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partners. Accordingly, healthcare standards must be integrated into all aspects of line of business requirements, health informatics and health information system design and engineering. Any award resulting from the solicitation will result in a firm fixed price (FFP) contract in accordance with (IAW) FAR PART 8.405-6.

The contractor shall, in collaboration with VA Office of Information and Technology (OI&T) developers, apply information technology best practices to ensure that security and privacy is harmonized across a broad spectrum of VA business partners, Federal agency and standards development organization engineering and architectural approaches/alternatives. This is to ensure that program development fully meets VHA line-of-business requirements related to security and privacy aspects. The contractor shall provide continuous subject matter expert support for health care line of business security engineering, architecture, requirement specification and other technical information transfer activities within VA for the integration of advanced/emerging security and privacy requirements of major initiative projects as described in Background Information. The contractor shall leverage all designated VA collaboration resources, including previously conducted VA proofs-of-concept, pilots or external Health Information Management Systems Society (HIMSS), RSA, HL7 or OASIS advanced security and privacy demonstrations. The contractor shall leverage all relevant activities under the Standards Development and Participation Service Category portion of this BPA. The contractors shall, as necessary, provide subject matter expertise to VHA supported initiatives/programs external to VA. Such projects include VHA and external organizations including but not limited to DoD, Kaiser Permanente, Department of Health and Human Services, Office of the National Coordinator, Federal Health Architecture, Substance Abuse and Mental Health Services Administration (SAMHSA), Federal Agencies (Departments of Justice, Commerce), Federal Health Information Modeling and Standards, and emerging trust frameworks such as Blue Button +, Direct Trust and the National Association for Trusted Exchange etc.

The contractor shall perform tasks and provide deliverables related to developing and applying technical standards to VA's high-priority projects such as VLER Health, MyHealtheVet, and VistA/VistA Evolution. Technical standards require that the contractor possess detailed engineering knowledge and experience in engineering disciplines including software development, network design, communications systems and protocols as applied to security and privacy technical methods. Participation includes advancing VA/VHA interest by developing, balloting and managing security and privacy standards within relevant Standards Development Organizations (SDO) and Standards Related Organizations (SRO).

The estimated value of this action is \$1,039,190.00. The Period of Performance (PoP) for this requirement is one year from the date of award.

**(b) ESTIMATED DOLLAR VALUE:** \$1,039,190.00

**(c) REQUIRED DELIVERY DATE:** 07/31/2016



**(4) IDENTIFICATION OF THE JUSTIFICATION RATIONALE (SEE FAR 8.405-6), AND IF APPLICABLE, A DEMONSTRATION OF THE PROPOSED CONTRACTOR'S UNIQUE QUALIFICATIONS TO PROVIDE THE REQUIRED SUPPLY OR SERVICE.**

☒ FAR 8.405-6 (a) (i) (C) In the interest of economy and efficiency, the current requirement 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. The original order must not have been previously issued under sole source or limited source procedures.

The logical follow-on is in the interest of economy and efficiency because retooling that would be required and learning curve that would be experienced by a contractor new to the work would result in delays and additional costs as identified in paragraph 5 below compared with having the work performed by the logical follow-on contractor.

Previous Federal Supply Schedule order: GS35F0402R VA701-BP-0053 VA701-14-J-0043

**(5) DESCRIBE WHY YOU BELIEVE THE ORDER REPRESENTS THE BEST VALUE CONSISTENT WITH FAR 8.4 TO AID THE CONTRACTING OFFICER IN MAKING THIS BEST VALUE DETERMINATION:**

This is a continuing requirement. This work was previously covered by a BPA that has expired. Rates for the specific work of this action have already been determined to be fair and reasonable at the BPA level. A logical follow-on for this effort will avoid an unreasonable delay, which would have a substantial impact on development efforts for VA's engagement with security standards and standards influencing organizations such as the American National Standards Institute (ANSI), ANSI International Committee for Information Technology Standards (INCITS), Health Level Seven (HL7), Internet Engineering Task Force (IETF), Integrating the Healthcare Enterprise (IHE), Liberty Alliance, International Standards Organization (ISO), National Institute of Standards and Technology (NIST), Organization for the Advancement of Structured Information Systems (OASIS), Object Management Group (OMG), and World Wide Web Consortium (W3C).

Having a contractor new to the requirement perform the work would result in delays and associated costs due to the following:

- i.

The total estimated delay for procuring an open market competitive action would be 196 days (6.5 months) and does not include any further delays due to clarifications or discussions. The costs associated with this delay would be substantial and include portions of contracting and program staff salaries associated with the contract action, as well as portions of program staff salaries associated with fulfilling the need of the requirement during the duration of the delayed procurement process.
- ii.

A contractor new to the requirement would experience a period of retooling, and a learning curve that the logical follow-on contractor would not. Therefore resulting in higher cost and additional delay than under the proposed logical follow-on task order.
- iii.

The process for onboarding new contractor personnel is approximately ninety (90) days (at a minimum) for employees when all requirements are concluded. This alone accounts for what would be an additional three (3) month delay in performance.

**(6) DESCRIBE THE MARKET RESEARCH CONDUCTED AMONG SCHEDULE HOLDERS AND THE RESULTS OR A STATEMENT OF THE REASON MARKET RESEARCH WAS NOT CONDUCTED:**

This is a continuing requirement. The incumbent contractor, Edmond Scientific Company is a verified Veteran Owned Small Business (VOSB). This VOSB has been providing services under blanket purchase agreement (BPA) VA701-BP-0053, covering the period from 2/19/2014 through 7/31/2016. Request for Quotation (RFQ) VA-701-11-Q-0354 was issued on February 14, 2014. Two quotes were received; One from the incumbent VOSB, and one from an Other Than Small (Large) Business.

VetBiz was queried as part of the market research for this requirement. Nine (9) VOSB contractors and six (6) SDVOSB contractors were identified within the NAICS code of this work, however to avoid delays and additional costs identified in paragraph 5 above, it is in the best interest of the government to use other than full and open competition in accordance with FAR 8.405-6 (a)(i)(C) "In the interest of economy and efficiency" to award a logical follow-on Sole Source contract to the incumbent VOSB for a period of performance of one year.

**(7) ANY OTHER FACTS SUPPORTING THE JUSTIFICATION:**

This limited source logical follow-on is in accordance with the Veteran's First Contracting Authority of VAAR 819.7008, which states in part that sole source contracts may be issued to VOSB concerns when the anticipated price will not exceed \$5,000,000.00. At this time an SDVOSB vendor has not been identified that has also been determined to be capable, responsible, and able to provide the work at a fair and reasonable price due to the costs and delays identified in Paragraph 5 above. This limited source acquisition would cover this continuing requirement for a period of one year. Contracting will pursue a competitively awarded contract action to meet the needs of this requirement after the period of performance of the logical follow-on has expired.

**(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:**

As referenced above, this action will cover this need for a period of one year from the date of award, and a competitive action will be solicited and awarded to cover any future related work.

**(9) REQUIREMENTS CERTIFICATION:** I certify that the requirement outlined in this justification is a Bona Fide Need of the Department of Veterans Affairs and that the supporting data under my cognizance, which are included in the justification, are accurate and complete to the best of my knowledge. I understand that processing of this limited sources justification restricts consideration of Federal Supply Schedule contractors to fewer than the number required by FAR Subpart 8.4. *(This signature is the requestor's supervisor, fund control point official, chief of service or someone with responsibility and accountability.)*

  
SIGNATURE

\_\_\_\_\_  
DATE

\_\_\_\_\_  
NAME

\_\_\_\_\_  
TITLE

\_\_\_\_\_  
SERVICE LINE/SECTION

\_\_\_\_\_  
FACILITY



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**(10) APPROVALS IN ACCORDANCE WITH THE VHAPM, Volume 6, Chapter VI: OFOC SOP:**

a. **CONTRACTING OFFICER'S CERTIFICATION (required):** I certify that the foregoing justification is accurate and complete to the best of my knowledge and belief.

CONTRACTING OFFICER/DESIGNEE'S SIGNATURE

DATE

Andrea Fink  
Contracting Officer  
Program Contract Activity Central

b. **Director of Contracting/DESIGNEE:** I certify that the foregoing justification is accurate and complete to the best of my knowledge and belief.

SIGNATURE

DATE

Richard Dahmen  
Director of Contracting  
Program Contracting Activity Central

c. **VHA SAO HCA REVIEW AND APPROVAL (over \$700,000 to \$13.5 million):** I have reviewed the foregoing justification and find it to be complete and accurate to the best of my knowledge and belief and approve for restricting consideration of the Federal Supply Schedule contractors to fewer than the number required by FAR Subpart 8.4

Linda S. Greaves

DATE

Acting Director, SAO Central Region  
SAO Central Head of Contracting Activity (HCA)

\*\*\*Signatures have been redacted.\*\*\*