

JUSTIFICATION AND APPROVAL  
FOR OTHER THAN FULL AND OPEN COMPETITION

1. Contracting Activity: Department of Veterans Affairs (VA)  
Office of Acquisition and Logistics  
Technology Acquisition Center  
260 Industrial Way West  
Eatontown, NJ 07724
2. Description of Action: The proposed action is for a Firm-Fixed-Price (FFP) new work modification to contract VA118-11-P-0032, awarded on March 22, 2011, for additional Independent Verification and Validation services (IV&V) that will be incorporated into the current six (6) month option Period of Performance (PoP), which was exercised on February 2, 2012. The PoP for this modification will be extended by three (3) months from September 22, 2012 through December 21, 2012 in order to accommodate schedule delays in the Department of Veterans Affairs Time and Attendance System (VATAS) project development effort. The additional support services required are identical to the current IV&V evaluation, testing, and review support services being provided in support of the VATAS project development effort.
3. Description of the Supplies or Services: Additional IV&V testing, evaluation, and test results review support services are necessary to support the VATAS project. As the system has been further developed, otherwise unknown complexities have arisen that could not have been determined without the fit gap analyses currently being conducted under the development contract. These additional testing, evaluation, and test results review services have extended the VATAS development efforts as new required functionality is developed and implemented. It is imperative that the IV&V testing services are extended to provide an adequate and efficient level of support which includes verification that the VATAS software is functioning properly; meeting user needs, and is making appropriate use of the technology available. Seven (7) additional trips will also be necessary to attend additional program-related meetings and conferences throughout the option PoP; however only one (1) individual will be required to attend each meeting as opposed to the originally proposed three (3) individuals per trip. The seven (7) additional trips will be utilized for an off-site RDTs employee located in Florida to travel to DC to attend program related meetings, which is in the best interest of the Government. Furthermore, the work will be performed using the existing VA ProPath tools on the International Business Machines (IBM) Rational Suite. This action supports the Integrated Operating Model (IOM) major initiative that will implement a management structure to integrate VA's major corporate functions to enhance information-sharing and improve the effectiveness of the Department's mission and its delivery of service to Veterans. The total estimated price of this action is \$346,016.00.
4. Statutory Authority: The statutory authority permitting other than full and open

competition for this acquisition is 38 U.S.C. 8127(c), the Veterans First Contracting Program. Contracts awarded using this authority shall be supported by written justifications as required by Federal Acquisition Regulation (FAR) 6.302-5, "Authorized or required by statute".

5. Use of Authority Cited: The proposed source for this action is RightDirection Technology Solutions (RDTS), LLC, 300 E. Lombard St. Suite 840, Baltimore, MD 21202. RDTS is a registered and verified Service-Disabled Veteran-Owned Small Business (SDVOSB) in the Center for Veteran Enterprise (CVE) Vendor Information Pages (VIP.) RDTS is the incumbent contractor currently performing the IV&V evaluation, testing, and test results review services described above and has extensive knowledge of the VATAS program and the IOM major initiative concept of operations. Accordingly, RDTS's team possesses the requisite capabilities, knowledge and expertise to provide the support services required. RDTS is currently providing exceptional support for the IOM product delivery team to include verification that the VATAS software is functioning properly, meeting user needs, and is making appropriate use of the technology available. RDTS has a Quality Assurance (QA) and IV&V process to store IV&V plans, processes, templates, checklists, examples, and industry best practice standards. This will enable RDTS to provide a more efficient process by minimizing project start-up time and establishing a sound foundation for QA and IV&V services. Additionally, RDTS has conducted end-to-end testing on IT systems to evaluate compliance with approved requirements. RDTS also has performed an objective assessment, analysis, evaluation, review, inspection, and testing of software products and processes, by validating that development products conform to the requirements and that the software will satisfy the users' needs. RDTS has also established critical working relationships with IOM business owners and stakeholders and understands the culture of VA and the needs of IOM which is critical to the successful implementation of evolving processes critical to the IOM initiative. RDTS's current successful experience with IOM IV&V services will be a benefit to VA by eliminating the time required to understand VA culture, develop key relationships and understand the needs of the VATAS program under IOM such they will be able to continue its performance and provide the additional resources described herein without delay and provide immediate results.
6. Efforts to Obtain Competition: Market research was conducted and the details are contained in the market research section below.
7. Actions to Increase Competition: All future requirements will be handled on a case-by-case basis to determine any future acquisition strategy, however the IV&V services described herein are in support of the VATAS program only and will cease once the VATAS program has been fully tested and put into production on the VA network.


8. Market Research: Market research was conducted by searching the VetBiz.gov VIP database on February 13, 2012 to determine if RDTS is a SDVOSB. This search concluded that RDTS is registered and verified in the VetBiz.gov VIP database and qualifies as a SDVOSB in accordance with federal small business size standards for the applicable North American Industry Classification System code 541511. Additionally, a search in the Central Contractor Registration (CCR) performed on February 13, 2012 showed that RDTS is registered under CCR. Based on this market research, the Government's technical experts have determined RDTS is a SDVOSB and can meet the Government's requirements. Additionally, the proposed award will be synopsisized on the Federal Business Opportunities Page in accordance with FAR 5.301 (a)(2)(i).
9. Other Facts: The Contracting Officer has determined that this action meets all the requirements of 38 U.S.C. 8127 (c). The total value of the twelve (12) month base period is \$3,741,652.68 and the total value of the six (6) month option period, which was exercised on February 2, 2012, is \$910,081.68 under the current RDTS contract. Given the estimated value of \$346,016.00 for the three (3) month extension of IV&V support services provided in this modification, the resulting total estimated contract value is \$4,997,750.36; below the \$5,000,000 threshold under the Veterans First Contracting Program.

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.

Andre Hardeman

Date: 02/21/2012

Project Manager

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 on the Independent Government Cost Estimate and price analysis.

Debra G. Clayton

Date: 2/29/2012

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. Given this proposed contract action does not exceed \$650,000 this certification also serves as approval of this justification.

Debra G. Clayton

Date: 2/29/2012

Procuring Contracting Officer Signature: 