

**Justification
For Other than Full and Open Competition**

1. Contracting Activity: Department of Veterans Affairs (VA)
Office of Acquisition Operations
Strategic Acquisition Center
10300 Spotsylvania Ave, Suite 400
Fredericksburg, VA 22408

2. Description of Action: The Department of Veterans Affairs, VISN 01, VA Boston Healthcare System, National Center for Posttraumatic Stress Disorder (PTSD), Behavioral Science Division proposes to increase the scope of services and add additional work on an other than full and open competition with Education Development Center (EDC), 3 Foundry Ave, Waltham, MA for the development of new functionality to VetChange. VetChange is an online and self-guided online therapeutic program for Veterans who are concerned about their drinking and PTSD symptoms.

3. Description of Supplies or Services: The desired outcome of the project is to develop, implement, and provide operational maintenance and support for a new version of the VetChange website over a 12-month period of performance. This new version, with added functionality, will enable VA clinicians to use it as a provider-facilitated program with Veterans they are treating in person. VetChange presently works as a self-directed experience only. The vendor shall complete planning, development, testing and implementation (launch) within the first six months, and provide maintenance and support in months 7-12 during the operation of the research study.

A Firm-Fixed Price Task Order (GS-10F-0406P; VA241-16-F-0268) was awarded for the initial work on 08/01/2016 for a base and four-twelve month options with period of performance 08/01/2016 thru 07/31/21. The Task Order was awarded for the sum of \$400,000.00. This additional work, if approved, will be implemented in option period one effective 08/01/2017. The total estimated cost of the additional work is \$918,906.75. The total estimate for the initial and additional work is \$1,318,906.75.

4. Statutory Authority: The statutory authority permitting other than full and open competition is 41 U.S.C. 3304(a)(1) as implemented by the Federal Acquisition Regulation (FAR) 6.302-1(c), "Only One Responsible Source and no Other Supplies or Services Will Satisfy Agency Requirements."

5. Rationale Supporting Use of Authority Cited Above: The new project is a direct extension of the VetChange product and it serves the same core purpose as the original work under the first contract, which is giving Veterans Internet-based tools to control their drinking and manage PTSD symptoms. EDC, as the builder of VetChange, is uniquely familiar with both its intricate technology and its subject matter. While VetChange was conceived by VA researchers and clinicians, EDC has been an essential partner in translating these ideas to the development and ongoing deployment of a complex web software application with the potential to improve the lives of Veterans in important ways. EDC, as the prime contractor, provided all software development and implementation of VetChange, plus state-of-the art guidance on adult learning principles, content development, and instructional design. VetChange is a complex, custom-built web software application. It does not utilize existing website publishing or online learning software. It was instead programmed from the ground up (ASP.NET, VB.NET, C#, MS SQL, HTML, CSS, Javascript) by EDC software developers as a completely novel web application that personalizes a unique clinical program to the individual experience of each Veteran using it. No other software team can presently maintain or modify VetChange. Working with any vendor other than the one that built VetChange would incur significant additional project risk, potential delays in fulfilling the agency's requirements, and cost. VetChange is complex, custom-built web software application, we conservatively estimate any other vendor would need at least 2 to 3 additional months to "come up to speed" on the existing VetChange program before they would be ready to begin the modifications required by this project. In addition, such a vendor would necessarily progress with the programming work itself much more slowly because they would be modifying a complex, custom-built product that they did not build. There will be a substantial duplication of costs; the increased project time would substantially increase the cost,

easily adding 35% and likely more. Another vendor would have to subcontract with the original developers (EDC) for assistance in learning the VetChange software code, including meeting time and written documentation. It would not be possible for any other vendor to work on VetChange without this substantial technical information exchange from the original developers, adding still more cost to the project. Beyond the considerations of cost and time, using a different vendor would significantly increase the risk of vendor errors in translating the SOW to product features, or in programming errors, due to lack of previous experience with the VetChange product's front-end functions and the complex back-end technology. Any such errors would add still more time and cost to the project. EDC is deeply experienced in the content areas of PTSD and substance abuse. EDC has for many years developed educational programs and online interventions in these areas for many federal agencies (NIH, DoE, VA and others). EDC has the ability to assign project managers, instructional designers and other key project personnel with substantial experience in the content areas, which speeds the project, increases the quality of Veteran-facing material, and reduces the workload of VA staff. EDC's body of work in relevant topic areas includes several past projects for the VA National Center for PTSD, including [PTSD Coach Online](#), [PTSD Awareness in Healthcare Settings](#), [VetChange](#), [videos for the PTSD Consultation Program](#), and the course [PTSD Overview](#).

6. Efforts to Obtain Competition: This requirement will be synopsisized on Federal Business Opportunities in accordance with FAR 5.201. Any outside submissions received will be reviewed, and evaluated to see if capabilities that are provided can fulfill the government's requirement.

7. Actions to Increase Competition: The Government will continue to conduct market research to ascertain if there are changes in the market place that would enable future actions to be competed; however, all future requirements will be handled on a case-by-case basis to determine any future acquisition strategy.

8. Market Research: Market research was conducted and is in accordance with (IAW) FAR Part 10, which describes the policies and procedures for conducting market research to arrive at the most suitable approach to acquiring, distributing, and supporting supplies and services.

Methods Used to Conduct Market Research:

- a. VetBiz query (IAW FAR10.002(b)(2)(iv)—querying other Government databases relevant to agency acquisitions and VAAR 810.001—Market Research Policy)

The following searches have been conducted within the required source of VetBiz and in the embedded file below:

- (1.) 562 SDVOSB Firms with NAICS 518210 and no keywords;
 - (2.) 134 VOSB Firms with NAICS 518210 and no keywords;
 - (3.) Five (5) SDVOSB Firms with keywords of "Substance Abuse;" and
 - (4.) Zero (0) VOSB Firms with keywords of "Substance Abuse."
- b. A search of AbilityOne was conducted and identified that all the required services were unavailable through SourceAmerica (SourceAmerica is an AbilityOne Authorized Enterprise) (sourceamerica.org) or from Federal Prison Industries (unicor.gov). Additionally, there are no mandatory supply schedules that provide the needed services.
 - c. Review of GSA/FSS, GSA eLibrary (IAW FAR10.002 (b) (2) (IV)—querying other Government databases relevant to agency acquisitions). A search was conducted on GSA, 00Corp Professional Service Schedule 874-4; Training Services, Instructor Led, WebBased, Training and Education. There are 738 vendors on this schedule. However as stated above, the government will not be able to utilize another vendor without substantial duplication of cost to the government that is not expected to be recovered through competition or unacceptable delays in fulfilling the agency's requirement.

9. Any Other Facts Supporting this Justification: The estimate of ~35% increased costs for a vendor that did not build the original VetChange software was derived from projections of the increased effort required if utilizing such a vendor, based on prior experience managing custom software projects by contract vendors, including the original VetChange project. An analogous-projects estimation method was employed to construct a person-hours costs model for the 6-month software build. The two project stages most affected by using a new vendor would be Discovery/Planning and Software Programming, given that a new vendor would have no prior knowledge of the current VetChange program's functionality and content, nor the underlying custom, complex programming code and database structure to be modified and extended. The model increases the discovery/planning stage from 800 to 1200 billable hours and the software programming stage from 1600 to 2600 hours. Holding the estimated hours for the other project stages constant (storyboards/mockup and QA), the model produced a total hours estimate of 5400 for a new vendor and 4000 for EDC as vendor, a 35% increase.

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.

Veronica Thurston, Program Manager

7/13/2017

Date

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:

- a. Comparison of the proposed prices to the historical prices paid, whether by the Government or other than the Government for the same or similar items.
- b. Comparison with competitive published price list, published market prices of commodities, similar indexes, and discount or rebate arrangements.
- c. Comparison of proposed prices with an Independent Government Cost Estimate.

12. Determination of Best Value: I hereby determine that the proposed contract action will represent the best value to the Government consistent with FAR 6.302-1(c).

Brian C. Love, Contracting Officer

Date

Approval

In my role as Local Competition Advocate, based on the foregoing justification, I hereby approve the acquisition of the additional work for VetChange Contract #VA241-16-F-0268 in the estimated total amount of \$918,906.75, on an other than full and open basis, pursuant to the authority cited in FAR 6.302-1(c), Only One Responsible Source and No Other Supplies or Services Will Satisfy Agency Requirements, subject to availability of funds, and provided that the services and commodities herein described have otherwise been authorized for acquisition.

Elegear Primus
Deputy Associate Executive Director
Strategic Acquisition Center
Department of Veterans Affairs

Date