

LIMITED-SOURCES JUSTIFICATION

1. Contracting Activity: Department of Veterans Affairs (VA)
Office of Acquisition Operations
Technology Acquisition Center
23 Christopher Way
Eatontown, NJ 07724

2. Description of Action: The proposed action is for a firm-fixed price Task Order to be issued under the General Services Administration (GSA) Federal Supply Schedule (FSS) Information Technology (IT) 70 contract number GS-35F-0485N to Document Storage Systems (DSS) Inc., for brand name Dental Record Manager Plus (DRMPlus) software maintenance.

3. Description of the Supplies or Services: The proposed action is for DRMPlus software maintenance inclusive of software updates, bug fixes, training, workflow optimization, software modification, technical support services, and help desk support for VA's 225 deployed instances of DRMPlus software. DRMPlus is a software suite utilized by all Veterans Health Administration (VHA) sites hosting dental facilities. DRMPlus software is utilized by VA dental staff to electronically capture meaningful data for dental patient encounters as part of the normal examination and treatment workflow. Under this effort, the contractor shall provide software maintenance for VA's instances of DRMPlus. The contractor shall provide DRMPlus software maintenance and support inclusive of software updates, bug fixes, training, workflow optimization, software modification, technical support services, and help desk support. The contractor shall provide software maintenance and support for the current DRMPlus system via help desk from 8:00 am to 7:00 pm Eastern Time, Monday through Friday. DRMPlus software maintenance and support shall include bug fixes, patch preparation and release, correction of display inaccuracies, maintenance of integration agreements, and code versioning. The contractor shall also provide off-hours support after normal help desk operating hours. The contractor shall provide a call-in number for an after-hours call and call back within four hours. The contractor shall monitor the VA Service Desk system in addition to providing telephone and e-mail support. This proposed action is for services only, no software will be procured. The period of performance shall include a 12-month base period with two 12-month option periods for continued maintenance. VA anticipates utilizing this software for a minimum of three years and therefore requires the ability to ensure it remains operational in that time with this software maintenance and support. There is also an optional task for additional training, which may be exercised up to 12 times annually, at the Government's discretion. The total estimated price of the proposed action, inclusive of options, is [REDACTED]

4. Authority: This acquisition is conducted under the authority of the Multiple-Award Schedule Program. The specific authority providing for a limited source award is Federal Acquisition Regulation (FAR) Part 8.405-6(a)(1)(i)(B), "Only one source is capable of providing the supplies or services required at the level of quality required because the supplies or services are unique or highly specialized."
5. Rationale Supporting Use of Authority Cited Above: The proposed source for this action is DSS Inc., 12575 US Highway 1 Suite 200, Juno Beach, Florida, 33408. DSS, Inc. Based on extensive market research, as described in section 8 of this justification, it was determined that competition is not viable, as DSS, Inc. developed the customized software interface utilized by the DRMPlus software interface with Veterans Health Information Systems and Technology Architecture (VistA)/ Computerized Patient Record System (CPRS). DSS, Inc. owns the proprietary source code for the DRMPlus software interface with CPRS. Any other source providing software maintenance for DRMPlus would need access to the inner workings of the source code to provide updates, modifications, and patches to the software. DSS Inc. has developed the DRMPlus CPRS interface and Graphical User Interface (GUI) and maintains the proprietary rights to the software. VA previously approached DSS in 2014 and again in July 2017 about the possibility of purchasing the DRMPlus source code. DSS declined to sell the VA the source code. Due to its high level of technical complexity, the Government does not possess the capability to develop an adequate competitive technical data package.

The VHA Office of Dentistry implemented the DSS Dental Record Manager (DRM) software product throughout the VA in 2001. In 2003 and 2004 DRM was significantly enhanced and thus, renamed DRMPlus. At that time, it was reclassified as a VistA Class I software product. VistA Class I software products are considered essential components of the VistA suite of applications and are nationally deployed. Class I software is subject to a standardized rigorous development, testing, and deployment processes. Since Class I software suites are an essential component of the VistA suite, they must be maintained and remain current with all other software in production VistA systems. DRMPlus, as currently deployed throughout VA, is an adaptation of the Discus Dental Clinical Vision Commercial off-the-shelf (COTS) software and has been highly customized and modified for use in the VA healthcare environment. It is installed in all VHA sites hosting dental facilities and used in over 7000 dental patient encounters daily.

DRMPlus does not replace CPRS, but serves as an adjunctive GUI application to collect and maintain dental specific information over and above the information collected through CPRS. This additional information collected is critical to the care of VA dental patients. DRMPlus purposely does not

duplicate functions already existing in the suite of VistA/CPRS applications, but exposes these functions in a manner to most efficiently support the dental encounter workflow. This "single-entry" process simultaneously records dental diagnostic data, and dental treatment planning data, imprints data to both the VistA Patient Care Encounter and VA Corporate Data Warehouse (CDW) databases, thereby eliminating duplicate entries into multiple systems. This single entry process creates a more accurate, inclusive, efficient, and less costly data storage process. Since it is fully integrated with the regional VistA host system, DRMPlus transfers data to the CDW for national aggregation utilizing the common VistA extraction routines employed by the CDW. This capability allows for the establishment of a second tier data warehouse based on the CDW dental domain which serves as the business intelligence repository for the Dental Reporting and Analytics System.

Further, only DRMPlus software maintenance and support meets the Government's requirements for interfacing with VistA/CPRS. DSS ensures compatibility with VistA and the CPRS by maintaining both the VistA dental package namespace (specific application where the program code resides and executes) and the DRM executable (instructions file that allows DRMplus to run on the operating system). The DRMPlus software was customized specifically and uniquely for VA to be used and integrated with VistA/CPRS. DRMPlus is the only known dental records software with the ability to push and pull information from VistA/CPRS. Utilizing any other software product other than DRMPlus would require significant recoding, retesting, and recertification to establish a VistA/CPRS interface. Based on historical experience, establishing a new interface would require a multi-year development timeframe. During this development timeframe, dental specific diagnostic findings, standardized examinations, and care plans would not be available and would very negatively impact both patient care quantity and quality. Additionally, utilizing any other software may result in a disruption to clinical operation, interoperability issues, and a loss of patient records. Dental provider productivity would be reduced and essential dental-specific operational reporting would not be possible.

As a mandated, fully deployed, and essential application at all sites, proper maintenance of DRMPlus is critical to VA clinical patient care and national dental operations. Maintenance and support of the DRMPlus software is essential, as changes are made to VistA/CPRS, and as data structures are modified to support CPRS and ancillary VistA packages, the DRMPlus product must be synchronized with these changes. If DRMPlus and CPRS/VistA are not kept synchronized, access to dental specific diagnostic findings, standardized examinations, and care plans may not be available. Additionally, software updates, bug fixes, help desk support, training, workflow optimization, software modification, and technical support services are required. These services are required to ensure operational availability of

the DRMPlus software, resolve end user technical issues, and ensure efficient operation of the software in the VA Healthcare Setting. Technical support services are required to provide technical information to leadership and IT professionals regarding VistA interface implications. DRMPlus software maintenance can only be provided by DSS Inc. Only DSS, Inc. can provide the required software maintenance and support because the software communicates through a source code that is based on DSS, Inc. proprietary data and access to their proprietary source code is required in order to develop and implement the software updates for proper configuration. No other contractor would be allowed to modify the software or software code without access to this proprietary source code.

6. Efforts to Obtain Competition: Market research was conducted, details of which are in the market research section of this document. This effort did not yield any additional sources that can meet the Government's requirements. All GSA FSS orders are placed under existing schedules and thus are not required to be synopsisized pursuant to FAR subpart 8.405-6(a); however in accordance with FAR 8.405-6(b)(3) this Limited-Sources Justification shall be posted on the GSA eBuy website to fully notify all parties. In accordance with FAR 5.301 and 8.405-6(a)(2), this action will be synopsisized on the Federal Business Opportunities Page and the Justification will be made publicly available within 14 days of award.
7. Actions to Increase Competition: In order to remove or overcome barriers to competition in future acquisitions for this requirement, the program office will continue to perform market research to ascertain if there are any changes in the marketplace that would enable future actions to be competed. The Government will also perform market research prior to the exercise of each option period to determine if it is the most advantageous method of fulfilling the Government's need. Should such opportunities become available, VA will consider them for future requirements.
8. Market Research: VA technical experts conducted market research through an internet search in March 2017 of products and services similar to DRMPlus including Carestream Dental CS R4, MicroMD/Dentrix, and NextGen EDR. The research concluded that although other dental record products exist, none have the proprietary interface that would be required to glean and imprint information on VA patient records in CPRS nor would they be able to support the capacity required by the vast VA Healthcare Network. As noted above, integration with VistA/CPRS is a significant requirement for VA dental records, and acquiring the necessary coding, testing and approval to integrate a new product to VistA/CPRS is anticipated to take multiple years. During this time, dental specific diagnostic findings, standardized examinations, and care plans would not be available and would very negatively impact both patient care quantity and quality. Dental provider

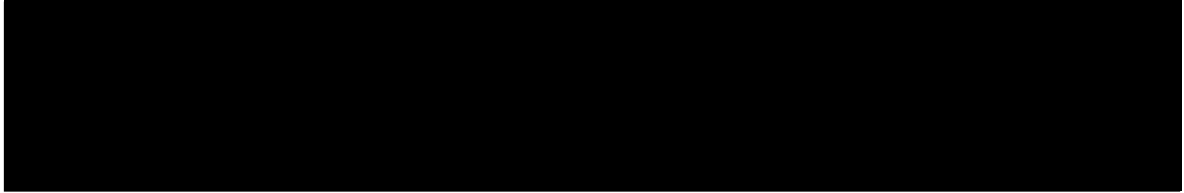
productivity would be reduced and essential dental-specific operational reporting would not be possible. Additionally, the technical experts reviewed the maintenance services provided by the aforementioned software providers. None of the vendors reviewed have the ability to provide the maintenance services for the customized capabilities and CPRS interface of the DRMPlus application.

In addition, a Request for Information (RFI) was issued on June 28, 2017 via the Federal Business Opportunities website, the GSA eBuy website and the National Aeronautics and Space Administration (NASA) Solutions for Enterprise-Wide Procurement (SEWP) V website to ascertain if there were any other sources that could meet the Government's requirement for brand name DRMPlus software maintenance. Responses were received from DSS, Inc., the incumbent contractor, and Minburn Technology Group, LLC (Minburn), an authorized reseller of DSS products. Minburn reached out to VA shortly after submitting their RFI submission and stated that DSS, Inc. contacted them and based on those discussions, resellers are not available.

Based on the extensive market research set forth above, the Government's technical experts have determined that only DSS, Inc.'s DRMPlus software maintenance and support can meet all of the Government's technical requirements and that DSS, Inc. is the only responsible source as it is the developer and sole provider of the DRMPlus software and associated maintenance and support services.

9. Other Facts: The award of this order will ensure the ongoing operation of critical patient care software utilized daily at all VHA sites. Failure to maintain and support DRMPlus will significantly disrupt clinical operations where dental care is provided, resulting in compromised dental patient care and diminished provider productivity.

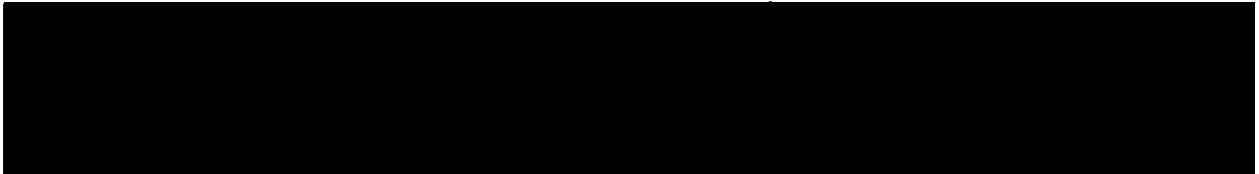
10. Technical and Requirements Certification: I certify that the supporting data under my cognizance, which are included in this justification, are accurate and complete to the best of my knowledge and belief.



11. Determination of Best Value: I hereby determine that the proposed contract action will represent the best value to the Government consistent with FAR 8.404(d). GSA has already determined that the prices on the FSS contract are fair and reasonable. Additionally, price discounts will be sought. Finally, the quote will be compared to the Independent Government Cost Estimate.



12. Procuring Contracting Officer Certification: I certify that this justification is accurate and complete to the best of my knowledge and belief.



Approval

In my role as procuring activity Advocate for Competition, based on the foregoing justification, I hereby approve the acquisition of DRMPlus Software Maintenance on an other than fair opportunity basis pursuant to the authority cited in paragraph 4 above, subject to availability of funds, and provided that the services herein described have otherwise been authorized for acquisition.

