

JUSTIFICATION  
FOR AN EXCEPTION TO FAIR OPPORTUNITY

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 sole source task order against Contract Number VA118-16-D-1016 is for a firm-fixed price (FFP) effort for the migration of development efforts for Vets.gov with SRA International, Inc., 4300 Fair Lakes Court, Fairfax, VA 22033. The purpose of this procurement is to continue the migration of functionality from the Enterprise Veteran Self Service (EVSS) Portal/e-Benefits into Vets.gov. These services are vital to improving Veterans access to the VA's services and improving the Veterans' experience while obtaining benefits from the agency.

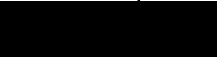
3. Description of the Supplies or Services:  
In 2015, VA performed an inventory of its customer-facing websites and determined it had 42 call centers, 220 databases, 9,561 toll-free (800) numbers, and over 1,000 websites that Veterans had to navigate to access the benefits they earned. Vets.gov was established to create a single online presence for all interactions and to help Veterans easily discover, apply for, track, and manage the benefits they have earned. The unification of these sites will provide a seamless user-experience and improve technical performance while lowering operating and sustainment costs.

The migration and unification of all these sites, centers, and tools into the cloud-based Vets.gov platform began with the initial release in November 2015. The creation of Vets.gov content is an ongoing collaborative effort between Veteran users and the Digital Service VA (DSVA) team. The combined features of Vets.gov allow for easy access and use, and result in reduced calls to VA call centers and better experiences for Veteran users.

Currently this support is obtained through an expiring task order, VA118-15-F-0011, under the IDIQ contract, VA118-11-D-0053 for the second phase of the Veterans Relationship Management EVSS Portal Platform Development which was competitively awarded to SRA on July 17, 2015. This task order will expire on January 12, 2018. Timely transitional activities cannot efficiently or effectively occur without continuous short-term contractual engagement and support by this resource.

The migration services required by the Vets.gov team include services such as knowledge transfer, application integration development, and EVSS application user interface changes. The development will allow for the remaining EVSS functionality to be migrated to the Vets.gov website, thereby allowing VA to decommission EVSS/eBenefits. Services to be included are: Disability compensation services,

including applications for dependent claims, applications for aid and attendance, release of private medical information, and any self-service disability compensation services not completed in 2017; Digital forms related to the Vocational Rehabilitation and Employment program; Digital forms related to the Virtual Lifetime Electronic Record program; Personal Contact Information Update services, including display and, when appropriate, update of compensation disabilities payment history, education and VR&E benefits, dependents, and power of attorney; Services to find or request a power of attorney, either an individual or a Veterans Service Organization; Display of information related to the Federal Individual Recovery Program, Federal Recovery Coordination Program, and/or the Interagency Comprehensive Plan [tentative]; Services for Veterans Service Organizations currently provided in the eBenefits Stakeholder Enterprise Portal. The period of performance will be a one-year base and two six-month option periods. The anticipated start date is January 12, 2018. The total estimated dollar value is



4. Statutory Authority: The statutory authority permitting an exception to fair opportunity is Section 41 U.S.C. 4106(c)(1) as implemented by the Federal Acquisition Regulation (FAR) Subpart 16.505(b)(2)(i)(B), entitled "Only one awardee is capable of providing the supplies or services required at the level of quality required because the supplies or services ordered are unique or highly specialized."

5. Rationale Supporting Use of Authority Cited Above: The agency expected to complete all migration of functionality from eBenefits to Vets.gov by January 12, 2018, however, the project experienced unanticipated delays. Specifically the unanticipated delays were due to redefining and capturing technical and security requirements. Consequently, this delayed SRA's ability to complete the migration to Vets.gov. As of October 2017, VA has captured all of its technical and security requirements to allow for completion of this effort.

Since Vets.gov's initial launch on November 11, 2015, the Vets.gov team has launched more than 50 products and reduced release cycle times from 90 days to 1 day. To-date the SRA and Vets.gov team have been able to migrate about 70% of the desired functionality, however, the remaining 30% is a more complex effort than originally anticipated. While 70% has been accomplished in two years, due to the complexity of the remaining 30%, the VA believes it will take approximately 24 months to complete if the current contractor team is maintained.

The DSVA team is composed of highly skilled technical experts with substantial industry experience. These experts have analyzed the risks and estimate at least a 9 month delay attributable to a substantial duplicated effort if any contractor other than SRA were to perform the work. Any contractor other than SRA, which has already built its own environment, would have to build a new development and testing environment before commencing with any development activities.. Additionally, SRA is the only contractor with familiarity of the current state of the software architecture of eBenefits. Any other contractor would have to restart refactoring eBenefits code (i.e. clarifying and simplifying the design) into micro-services which allow for Vets.gov to migrate needed functionality. Additionally, any other vendor would have to relearn VA backend partner services and

systems of record, which initially required multiple discussions both virtually and in person, requiring further ramp up time. These backend partner services are critical to the successful migration of Veteran-facing tools which rely upon them. A new vendor would also have to orchestrate data coming to/from the various services and implement complex logic to reshape that data into usable information for self-service tools (and VSO-facing tools). SRA has built tools that rely heavily on precisely the same services that Vets.gov will need to rely on, and no other contractor currently has this ability. Furthermore, SRA has the development and testing environments and tools already set up to continue on-going migration activities; all of which would have to be rebuilt, tested, and accepted by VA if a new contractor was on-boarded midstream. All of these activities would require a replication of efforts that SRA has already performed, creating a duplication of costs (████████████████████) to the VA, and result in a significant delay in performance. The DSVa's projections are also supported by historical evidence from multiple government contract engagements

This potential delay is unacceptable because delays in EVSS functionality migration to Vets.gov extends a poor experience for Veterans using eBenefits. As these issues are known by VA leadership, continuing timely migration efforts ensure VA is prioritizing self-servicing tools and modernization as directed in the Secretary's 18 priorities for 2018.

Furthermore, all EVSS functional migration must be completed before VA can turn down eBenefits and eventually EVSS. A delay in migration means eBenefits must continue to be maintained which creates a duplication of infrastructure and sustainment costs to the agency. Additionally, any delay prevents Veterans from easily obtaining the VA benefits owed to them by the VA. While Vets.gov has 99.99% availability, eBenefits has significantly less uptime, including multi-hour outages many weekends when updates are needed. This is primarily due to an alternative authentication method offered on Vets.gov and not utilized on eBenefits. More downtime means Veterans are not able to easily access, register, or review their VA benefits. Additionally, eBenefits is not responsive to the current needs and method for highest utilization by the Veteran community, as eBenefits is not mobile responsive. Vets.gov is mobile responsive, thereby providing self-servicing capability to a larger population of Veterans.

Many aspects of the migration work are mid-migration and completion of this migration will allow VA to provide mission centric services to Veterans. A delay has a severe impact on the Veterans access to services and VA's ability to timely and accurately provide such benefits.

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. There is no competition anticipated for this acquisition. In accordance with FAR 5.301 and 16.505(b)(2)(ii)(D), the award notice for this action will be synopsisized on the Federal Business Opportunities Page (FBO) and the justification will be made publicly available within 14 days of award.

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. The DSVa is fully committed to ensuring that future barriers to competition are overcome by utilizing open source code, iterative development practices for new work, and engaging with vendor outreach. Completing the migration activities will allow for competition to occur with future new development work supporting the Vets.gov team.

8. Market Research: The Government's technical experts conducted market research as recently as October 2017 to ascertain if any other sources could meet VA's requirements. This research included reviews of similar efforts and reviews of other sources' limited capabilities on the Transformation Twenty-One Total Technology Next Generation (T4NG) contract. This research coupled with the expertise of DSVa found no other sources that could meet VA's requirements for the reasons outlined in Section five of this Justification. These Government experts have analyzed the current predicament and estimate that there is significant risk of at least a nine month delay for any other contractor to duplicate the environment and tools that SRA has already created, gain familiarity with the complexity and interdependencies to backend partner services and systems, as well as, ramp-up an understanding and trust of the existing architecture and code base for new development efforts to continue. Furthermore, a comparison with other similar transition efforts was made, the details of which are stated in paragraph 5.

9. Other Facts: Being mid-migration causes multiple ripple effects for the agency and adding new functionality to eBenefits and/or Vets.gov. New development does not have a designated location and is based on where the functionality capability currently lives (e-Benefits vs. Vets.gov, and is a moving target). Therefore, this situation causes the danger to duplicate new development efforts based on an unanticipated priority, sensitivity, or timeline of a needed new action. Example- if VA is mandated to provide a certain functionality but currently the capabilities only lie on eBenefits due to delayed migration to Vets.gov, then the VA will essentially have to build the functionality twice to comply with the mandate – once in eBenefits to serve the immediate need and again when the functionality is ready to be migrated to Vets.gov. Every instance of additional delay in migrating eBenefits fully to Vets.gov makes the agency at risk for having to waste resources duplicating efforts due to mandated or shifting prioritization. The quicker this migration can be completed, the less risk of resource waste.

*Additional points of comparison between eBenefits and Vets.gov:*

Security improvements needed to comply with NIST standards:

- eBenefits only allows users to authenticate with DS Logon, which does not meet NIST LOA3 standards
- vets.gov provides a path for users to authenticate using ID.me which is FICAM-approved up to LOA3

Accessibility/508 compliance improvement needed to comply with 508 requirements:

- eBenefits applications have multiple 508/accessibility violations

- vets.gov deployments include automated end-to-end 508/accessibility tests that require each release to meet WCAG 2.0 AA standards

Enable faster access to care and more timely delivery of services:

- eBenefits often requires a multi-step, complicated way to apply for the benefits earned
- Vets.gov provides users the ability to apply for benefits like education that have resulted in a 50%+ increase in submissions