

**DEPARTMENT OF VETERANS AFFAIRS**

**Justification and Approval (J&A)  
For  
Other Than Full and Open Competition (>\$150K)**

**Acquisition Plan Action ID: VA701-18-AP-0155**

- 1. Contracting Activity:** Department of Veterans Affairs  
Contracting Agency: PCAC  
Organizational Activity: Office of Health and Informatics  
Purchase Request: Moodle Hosting  
2237: 776-18-3-3147-0147
- 2. Nature and/or Description of the Action Being Processed:** The proposed action is for a one-year firm-fixed-price (FFP) contract with three option years for a continuing requirement to provide ongoing and extended Moodle hosting and professional services in support of existing and upcoming VA educational content, including Health Informatics certification courses such as the American Medical Informatics Association (AMIA) 10x10 certificate course (a course sponsored by AMIA which provides a significant professional credential for Health Informatics) and Health Informatics survey courses that are anticipated to have an interagency audience, including Veterans Health Administration (VHA), Dept. of Defense (DOD), and Indian Health Service (IHS).
- 3. Description of Supplies/Services Required to Meet the Agency's Needs:** The contractor shall provide hosting and managed support services compatible with open source Moodle e-learning software for health informatics training courses for VHA staff. The hosting service shall be capable of supporting active users in excess of 10,000 annually for multiple courses with 30-1500 enrollees per session and features services such as Secure Sockets Layer (SSL) Certificate (necessary for VA Talent Management System (TMS) approval) and Integration Point (software to manage enrollment, add users, and create courses in batch mode format). The professional services (also referred to as eLearning administrator services), shall include Moodle Configuration, System Deployment (authentication, course shell deployment, enrollment, etc.), System Management (add/drop user accounts/user enrollments, daily operational testing and concurrency tracking), Planning Activities (demand forecasting, planning for upgrades and system outages), Cycle Management (end of course archival plan, develop and deploy start of cycle processes), and Ongoing Operational Support (non-emergent trouble resolution). The total value of the proposed action inclusive of the option periods is \$428,857.
- 4. Statutory Authority Permitting Other than Full and Open Competition:**  
( X ) (1) Only One Responsible Source and No Other Supplies or Services Will Satisfy Agency Requirements per FAR 6.302-1;  
( ) (2) Unusual and Compelling Urgency per FAR 6.302-2;  
( ) (3) Industrial Mobilization, Engineering, Developmental or Research Capability or Expert Services per FAR 6.302-3;  
( ) (4) International Agreement per FAR 6.302-4  
( ) (5) Authorized or Required by Statute FAR 6.302-5;  
( ) (6) National Security per FAR 6.302-6;

( ) (7) Public Interest per FAR 6.302-7;

5. **Demonstration that the Contractor's Unique Qualifications or Nature of the Acquisition Requires the Use of the Authority Cited Above (applicability of authority):** The proposed source for this action is Remote-Learner, 201 Osage Lane, Suite 2, Waynesboro, VA, 22980. This acquisition is highly specialized in that the Moodle-based Learning Management System (LMS) content is currently hosted by Remote-Learner and professional certification courses are currently in progress that must not be disrupted by a change in the hosting service vendor. Although there are other Moodle-certified Partner vendors capable of hosting Moodle-based LMS content (Moodlerooms, Inc., A2 Hosting, iPage.com, InMotion Hosting and Siteground.com), the process of transitioning ongoing, live course content requires numerous, complex actions and entails unacceptable risks (qualified hosting vendor, disruption of service, transfer of content and connectivity, etc.). Market research demonstrated that accomplishing such a transfer would be estimated to cost an additional \$466,000.00 and will unavoidably entail disruption of the ongoing courses and student access. Only Remote-Learner has the capability of continuing and expanding the currently hosted content without imposing undue risk and unreasonable cost.

6. **Description of Efforts Made to ensure that offers are solicited from as many potential sources as deemed practicable:**  
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. Additionally, the proposed action will be synopsisized on the Federal Business Opportunities Page in accordance with FAR 5.201. Any proposals that are received will be evaluated.

7. **Determination by the CO that the Anticipated Cost to the Government will be Fair and Reasonable:**  
All pricing will be determined fair and reasonable prior to award.

8. **Description of the Market Research Conducted and the Results:**  
On May 9, 2018 [www.vip.vet.biz.gov](http://www.vip.vet.biz.gov) (VIP) was queried to identify possible Veteran-Owned Small Business (VOSB) and Service-Disabled Veteran Owned Small Business (SDBOSB) concerns capable of completing the requirements for the subject procurement. The search criteria utilized was NAICS code "519130 – Internet Publishing, Broadcasting and Web Search Portals". The search of this NAICS code identified 153 matches. (Attachment A: VIP Search NAICS 519130 Results)

On May 9, 2018 A System for Award Management (SAM) search was conducted utilizing search records with business name Remote-Learner US Inc. The entity registration summary revealed that their registration status was Active with DUNS: 786937396 and CAGE Code: 5PC2 (Attachment B: SAM Search Results)

On May 9, 2018, a Special Notice was posted to FedBizOps (FBO) to maximize competition for the subject requirement. An email blast was sent out to the 153 VIP matches with a link to the FBO posting. The notice closed on May 18, 2018 at 10:00am. There was only one (1) response received. (Attachment C: Email sent to vendors of NAICS - 519130 VIP Search)

The Program Manager determined that the vendor (Premier Mechanical Group) was not capable of meeting the necessary requirements of the Moodle Hosting and Support. There was no evidence found that PMG has a record of providing hosting and consultative support for Moodle. In addition, there was no indication that they (PMG) are already in the business of providing Moodle hosting based on the information available on their site relative to their company and services. The program

manager determined that only Remote Learner was capable of meeting the needs of the government for this requirement.

**9. Any Other Facts Supporting the Use of Other than Full and Open Competition:**

None

**10. Listing of Sources that Expressed, in Writing, an Interest in the Acquisition:**

See Section 6 above.

**11. A Statement of the Actions, if any, the Agency May Take to Remove or Overcome any Barriers to Competition before Making subsequent acquisitions for the supplies or services required:**

**12. 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 and belief.

Elizabeth S.

Chapman

321373

Elizabeth Chapman

Program Manager

Office of Health Information

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Chapman 321373  
Date: 2018.06.05 10:56:00 -04'00'

\_\_\_\_\_  
Date

**13. Approvals in accordance with the [VHAPM Part 806.3 OFOC SOP](#):**

- a. **Contracting Officer or Designee's Certification (required):** I certify that the foregoing justification is accurate and complete to the best of my knowledge and belief.

Kaylan M. Grove 1489779

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Date: 2018.06.05 09:01:17 -04'00'

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Kaylan Grove

Contracting Officer

Program Contracting Activity Central (PCAC)

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Date

- b. **One Level Above the Contracting Officer (Required over \$150K but not exceeding \$700K):** I certify the justification meets requirements for other than full and open competition.

Shon J. Johnson 198386

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Date: 2018.06.06 14:47:04 -04'00'

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Shon Johnson

Supervisory Contract Specialist

Program Contracting Activity Central (PCAC)

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Date