

DEPARTMENT OF VETERANS AFFAIRS

**Justification and Approval (J&A)
For
Other Than Full and Open Competition (>SAT)**

Acquisition Plan Action ID: 36C249-18-AP-0237

1. **Contracting Activity:** Department of Veterans Affairs, VISN 09, Memphis VA Medical Center (Memphis, Tennessee), Network Contracting Office (NCO) 9. Purchase Requisition 614-18-4-560-0301.
2. **Nature and/or Description of the Action Being Processed:** This is a request for an enterprise-wide contract for the ProVation MD package which is an all-encompassing electronic procedure documentation software allowing a physician (General Surgeon, Gastroenterologist or Pulmonologist) to electronically document their procedure following the care of a patient. The software package is a Multi Care Giver where an element of the features allows for electronic nursing documentation which enables VA nurses to document pre-procedure, intra-procedure and post-procedure patient information. This enterprise-wide software system is will allow for increased quality, a reduction in time and errors, this will increase the validity and reliability of medical care in VISN 09. This project will be justified under a limited source contract action in an effort to standardize the same endoscopy reporting software at all VA medical centers located within VISN 09. Lexington VA Medical center within VISN 09, currently operate under this ProVation MD package and have proven the software greatly contributes to the care of Veterans.

FAR13.5 Simplified Procedures for Certain Commercial Items: This procurement is for a software product in accordance with FAR 13.5 Simplified Procedures for Certain Commercial Items and specifically FAR 13.501 Special Documentation Requirements, where acquisitions conducted under Simplified Acquisition Procedures are exempt from the requirements of FAR Part 6, but still require a justification using the format of FAR 6.303-2. This requirement will be procured as a Firm-Fixed Price contract.

Estimated cost: \$ 395,549.00

3. **Description of Supplies/Services Required to Meet the Agency's Needs:** VISN 09 requires a GI clinical procedure documentation and coding system for 7 physical locations. This document supports standardized reporting of Gastrointestinal (GI) endoscopic procedures in the electronic medical record and to enable the capture of standardized information about GI endoscopic procedures across the Veterans Health Administration (VHA).

This request is consistent with the Eight for Excellence goal to continuously improve the quality and safety of healthcare for Veterans, particularly in those health issues associated

with military service as well as the Under Secretary's VHA Power of Performance goal to put patient care first, and improve access to care.

4. Statutory Authority Permitting Other than Full and Open Competition:

- ☐ (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 unique qualifications of the aforementioned software package foster an overall facility level of integration which is presently non-existent between the VISN facilities. The Lexington VA Medical center has recently acquired ProVation MD for their endoscopy units. The trainees and gastroenterologists at these locations must be able to communicate test result among the whole VISN. If the VA were to acquire a different software system, it would introduce inefficiencies both in terms of training and ongoing clinical care. Moreover, it would introduce additional risk of incomplete or inaccurate documentation in the medical record. Currently we have two different charting programs among the medical centers, this introduces substantial risk to patient care. Use of the same endoscopy reporting software at the VISN 09, in this instance ProVation MD, will further facilitate more efficient care of Veterans.

Provation has exclusive access to the EndoWorks Export Tool. The EndoWorks Export Tool is the only authorized tool which accurately extracts data from EndoWorks into standardized files, so that the data can be correctly imported into the Preferred Vendor's systems, retaining data integrity.

Colorectal cancer is the second leading cause of cancer death in North America. Screening of asymptomatic average risk individuals via colonoscopy has been recommended by the VHA Directive on Colorectal Cancer Screening (1015), the United States (US) Preventive Services Task Force, the American Cancer Society (ACS) and the Multi-Society Task Force on Colorectal Cancer (MSTF-CRC). In 2002, the MSTF-CRC identified key quality indicators that would improve the quality of colonoscopy. The Quality Assurance Task Group of the National Colorectal Cancer Round Table (NCCRT) developed a standardized Colonoscopy Reporting and Data system (CO- RADS), as the consensus data elements that should be considered when colonoscopy is performed. Implementation of a GI endoscopic application based upon CO-RADS, would help VHA to improve the quality of care provided to Veterans.

Standardization of the language of GI endoscopy is becoming increasingly important on account of standardized documentation requirements, and computer-based reporting. The Minimal Standard Terminology (MST) for GI endoscopy is the result of continuous work by the European Society of Gastrointestinal Endoscopy (ESGE), the American Society of Gastrointestinal Endoscopy (ASGE), the World Endoscopy Organization (WEO), and other international collaborators. Incorporation of the MST into the GI endoscopy application will enable structured documentation of endoscopic results, bringing VHA into alignment with international standards.

6. **Description of Efforts Made to ensure that offers are solicited from as many potential sources as deemed practicable:** The contracting officer conducted market research via release of a sources sought synopsis on 20 June 2018 and determined the GI software market had Two respondents to the request. Due to the critical nature of continuity required under this requirement for a singular training program, none of the respondents could offer the ProVation software package to the capacity required for an enterprise-wide solution. Also due to compatability issues considering a new product would create a risk that at this time is not feasible for contunied patient care.
7. **Determination by the CO that the Anticipated Cost to the Government will be Fair and Reasonable:** Commercial pricing is available for this software package and comparison between commercial off the shelf pricing and validation through other VISN pricing packages will be completed.
8. **Description of the Market Research Conducted and the Results, or a Statement of the Reasons Market Research Was Not Conducted:** The contracting officer conducted market research on 20 June 2018 and determined the GI software market had two respondents to the request. None of which could offer the ProVation software package. As this program matures and the technological advances progress, 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 offered competitively.
9. **Any Other Facts Supporting the Use of Other than Full and Open Competition:** Standardization across the Department of Veteran Affairs has been promoted and encourage this action further implements this wanted end state. Standardization across the VISN has shown to reduce training cost and improve overall patient care.
10. **Listing of Sources that Expressed, in Writing, an Interest in the Acquisition:** N/A
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:** The agency will continue to seek out opportunities to compete requirements of this type. Currently it is in the government best interest to utilize the ProVation reporting system.

VHAPM Part 806.3 Other Than Full and Open Competition (OFOC) SOP
Attachment 2: Request for Sole Source Justification Format >SAT

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.

8/24/2018

X B-TW

Brandon T. Weiss
VISN Chief Biomedical Engineer/Healthcare ...
Signed by: Brandon T. Weiss 448860

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.

Cheri Burton-
Crutcher 1593077

Digitally signed by Cheri Burton-
Crutcher 1593077
Date: 2018.08.29 11:03:52 -05'00'

8/29/2018

Cheri Burton-Crutcher
Contracting Officer
NCO 9, Supply Acquisition Team 1

Date

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

Jon E. Doliana, Sr.

Jon E. Doliana, Sr.
Branch Chief
NCO9, Supply Acquisition Team

8/29/18
Date