LIMITED-SOURCES JUSTIFICATION

1. <u>Contracting Activity:</u> Department of Veterans Affairs (VA)
   Office of Procurement, Acquisition, and Logistics
   Technology Acquisition Center
   23 Christopher Way
   Eatontown, NJ 07724

2. <u>Description of Action:</u> The proposed action is for a Firm-Fixed-Price order to provide continued Enterprise Testing Service (ETS) Support Services (ETSSS). This effort is being conducted under the authority of the Multiple Award Schedule Program; the proposed effort will be awarded under General Services Administration (GSA) Federal Supply Schedule (FSS), Contract Number GS-35F-598GA to Planned Systems International, Inc. (PSI).

3. <u>Description of the Supplies or Services:</u> ETS services support the Secretary, Veterans Affairs (SECVA) priorities including the Electronic Health Record Modernization (EHRM) program and current VA legacy systems that are foundational to the Office of Electronic Health Record Modernization (OEHRM). EHRM is listed as the third overall VA priority for 2019 in the VA FY 2018-2024 Strategic Plan. The OEHRM is the program executive office charged with the preparation, deployment, and transition to a new electronic health record (EHR) within VA. The OEHRM program will ensure that deployment of the new EHR is done in a manner that meets VA needs and supports seamless healthcare to Veterans and qualified beneficiaries. The modernized health record directly supports improved customer service to Veterans. The Test and Evaluation (TE) program within OEHRM manages and oversees the execution of TE activities across the EHRM program and products. The TE community is comprised of TE resources, Chief Medical Office Test (CMOT) resources, Initial Operating Capability (IOC) site users, and the Cerner Testing and Quality Assurance (T&QA) team, all of whom are involved at various points across the testing lifecycle. The resources delivering these services include EHRM TE VA resources, Office of Information and Technology (OIT) ETS Government resources and ETSSS resources from PSI under GSA contract GS-35F-598GA. PSI currently provides 95 percent of the testing support services for ETS and 100 percent of testing support services for OEHRM TE.

   A Limited Sources Justification was signed and approved on September 4, 2018 for 12 months of continued testing support with PSI. Due to the complexities of the testing support and the amount of capabilities and workflows required, this support is still ongoing, and its completion is necessary to reach the IOC deployment (referred to as Block 1) in March 2020. The ETSSS services PSI currently provides are: test program management; TE support; test systems engineering and implementation; and test process and quality management for OEHRM TE, EHRM-OIT System Integrations, and OIT Enterprise Program Management Office portfolios/programs. Currently, the majority of the ETSSS testing support PSI provides is for OEHRM TE services and the EHRM-OIT System Integrations services which are required for successful implementation of the EHRM solution at the IOC sites: Mann-Grandstaff Medical Center and Puget Sound Health Care Systems. Majority of the continued

testing services support the IOC Block 1 deployment with testing beyond March 2020 supporting a more limited set of EHR functionality. VA is currently competing a contract for continued testing following Block 1 deployment.

The Block 1 deployment covers a variety of technically complex topics covering numerous clinical, technical and functional workstreams, projects and system interfaces within and external to Cerner and to VA. OEHRM testing supported by PSI includes Data Migration, Image Migration, Simulation Center/Test Center Connectivity, Health Information Exchange, Identity Management, Access Management, Cerner Millennium EHR (consisting of 236 capabilities and 1084 workflows), HealtheIntent, HealtheRecord and HealtheAnalytics, HealtheLife, Cerner Scheduling Solution, 73 Block 1 System Integration workstreams for VA Systems and third party/commercial (non-OIT) system integrations/interfaces, as well as 30 integrations with legacy VistA components. These test services are foundational to the success of OEHRM IOC Block 1 deployment. PSI is the only source to ensure continuity of these complex testing services required to meet the critical IOC schedule and EHRM implementation deadlines. Currently, PSI works closely and collaboratively across all OEHRM pillar organizations and the Cerner T&QA and CMOT teams to ensure an integrated approach and schedule for the OEHRM TE lifecycle. This current bridge effort will enable VA to retain the testing support services and expertise provided by PSI to meet the critical IOC Block 1 timeframes for delivery of an enhanced EHR. The period of performance is from September 15, 2019 through June 14, 2020, which includes an optional task for transition support. The total estimated value of the proposed effort, including the optional task, is ███████████.

4. Statutory Authority: This acquisition will be conducted under the authority of the Multiple-Award Schedule Program. The specific authority providing for a limited source award is Federal Acquisition Regulation (FAR) 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 is PSI, 10632 Little Patuxent Parkway, Suite 200, Columbia, Maryland 21044-6250. PSI is the only capable source to ensure continuity of these complex services, considering the critical need for EHRM IOC implementation deadlines to be met. PSI resources are integrated into the OEHRM workshop processes where workflows are designed and approved. PSI test systems engineering resources are tightly integrated into the System Integration Tiger teams across OEHRM, OIT, Chief Medical Office, and Cerner pillars. PSI project management resources are integrated into the OEHRM program control creation and maintenance of the Integrated Master Schedule.

IOC Block 1 is scheduled to be deployed in March 2020. The bulk of testing services that PSI is providing will support the IOC Block 1 deployment. Block 1 testing is intensive, complex, and covers multiple workstreams/projects/interfaces. Timelines are compressed for Block 1 testing due to the Cerner test environment not becoming fully available until July 2019. While a considerable amount of work

preparing test plans, cases, and workflow scenarios was completed by PSI, the full testing timeframes in the test environment were both pushed back and compressed to meet the IOC Block 1 deployment date. Given the compressed timeframe and extensive scope of testing to be done, it is essential to maintain the current testing expertise while planning for any transition required to occur after the Block 1 deployment.

Additionally, the testing of approved workflows and processes has become more complex than originally anticipated due to the large number of workflows associated with the EHRM solution, and the effort involved in obtaining clinical and functional consensus on VA enterprise-wide workflow configurations. Each workflow requires the testing team to develop a Criticality Analysis and Risk Assessment (CARA) execution. The OEHRM-specific knowledge gained by PSI to date from their integration into the workshops/workflow processes is essential to the CARA analysis of the approved workflows. CARA services are highly specialized and define the scope of workflows to be formally tested. Continued PSI presence during this process is critical since over 690 of the total 1,084 workflow reviews and approvals remain for analysis, approval and CARA execution in the next few months. Each workflow requires PSI CARA services to determine the risk-based evaluation scope. PSI has established an in-depth knowledge of both the approved workflows and the remaining 690 workflows that must be reviewed in a compressed timeframe. The Workflow Risk Assessment/CARA activity being completed is a predecessor that must conclude before any test cases can be written and executed. Educating another vendor in the complexities of EHRM workflows and the supporting CARA processes across every clinical function comprising the Cerner solution is not feasible in the timeframe required to support IOC Block 1 deployment. That transition process would require a duplication of work already performed by PSI for the remaining workflows required to be completed prior to Block 1 deployment.

Bringing on a new vendor as VA approaches the crucial IOC Block 1 deployment would introduce an unacceptable amount of risk to the OEHRM schedule and program due to a new vendor's inexperience in VA-specific risk assessment processes unique to VA CARA scoring algorithms; thus, jeopardizing the deployment of the expanded health care capabilities for both VA and Department of Defense (DoD) personnel. For a new vendor to provide these services, a significant transition time of approximately five months is needed to achieve full operating capability considering there are over 217 Enterprise Testing Services processes required for the new vendor to obtain the necessary expertise. This also includes knowledge transition for 73 system integrations, which includes reviewing the system integration surveys, "as is" interface control documentation and other key documents. The system integration work includes analysis of all IOC Interface Control Documents to identify test environment requirements, gap analysis of test environment requirements, and creation of test harnesses/virtualized services to address the gaps.

PSI is the only vendor with the CARA expertise, the insight into EHRM workflows, the knowledge to support system integration testing with VistA legacy components

and third-party systems required to support the current Block 1 deployment schedule. PSI has processes, environments and teams in place with the necessary expertise to perform and complete the required CARAs and formal testing on schedule. The test systems engineering services for systems integration require highly specialized knowledge of both the Cerner solution domains and existing VA legacy system domains. As noted, these testing activities are further compressed due to the long lead time for interface development, and the delayed provision of a complete testing environment based on the complexity of the work to date. There is no remaining time in the schedule for IOC Block 1 deployment to accommodate transition and education of a new test support vendor.

Based on the information presented above, PSI is the only source that can meet the current IOC Block 1 deployment requirements. PSI is the only vendor who can provide the required testing services, without adversely impacting EHRM implementation deadlines. PSI has resources with the required skillsets in teams organized to meet ETS mission requirements already in place, can ensure continuity, and can provide services required for EHRM implementation deadlines to be met. Failure or delay in meeting the Block 1 deployment represents a direct negative impact to the ability to seamlessly share DoD and VA health records in order to realize an improvement in care through modernization of VA systems, as directed by the SECVA and the President.

6. <u>Efforts to Obtain Competition:</u> Market research was conducted, details of which are in Section 8 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. The ordering activity will post this justification along with the solicitation to the GSA E-Buy website in accordance with FAR 8.405-6(b)(3). Additionally, in accordance with FAR 5.301 and FAR 8.405-6(a)(2), notice of award for this action will be synopsized on the Federal Business Opportunities (FBO) website and this justification will be made publicly available within 14 days of award.

7. <u>Actions to Increase Competition:</u> No barriers to future competition are anticipated. ETS is working a full ETSSS recompete simultaneously with this follow-on action. VA anticipates issuing a competitive solicitation for the ETSSS recompete, which is scheduled to be released on or about September 14, 2019. VA is anticipating an award of the competitive acquisition in the first quarter of Fiscal Year 2020. This will allow a smooth transition to onboard and methodically subsume all the future ETS testing activities which will occur after Block 1 deployment, if a vendor other than PSI is awarded the competitive effort.

8. <u>Market Research:</u> Market Research was conducted in July 2019 by issuing a Request for Information (RFI) on the FBO website. There was a total of nine responses to the RFI and draft Performance Work Statement. All nine responses were assessed, and six, including PSI, were deemed capable of meeting the government's requirements. However, of those six deemed capable, all vendors other than PSI would require an elongated transition period before reaching full

service delivery capability and would be required to duplicate work already performed by PSI. This lengthy transition period and duplication of work would negatively impact the Block 1 deployment schedule. Therefore, this sole source bridge effort is being done concurrently with the long-term competitive effort so that any potential transition can take place without negatively impacting the EHRM schedule. Only PSI has the ability to meet VA's existing requirements related to the critical path activities of the EHRM IOC phase. Introducing a new vendor prior to Block 1 deployment would pose significant risk to ETS operations and to the EHRM program. Therefore, PSI is the only source that can meet the Government's requirements.

9. Other Facts: None