

JUSTIFICATION AND APPROVAL  
FOR OTHER THAN FULL AND OPEN COMPETITION

1. Contracting Activity: Department of Veterans Affairs (VA)  
Office of Procurement Acquisition and Logistics  
Technology Acquisition Center  
23 Christopher Way  
Eatontown, NJ 07724
2. Description of Action: The proposed sole source action is for a 90-day modification to contract 36C10B18C2756 to AO JV I, LLC, 5389 Playa Vista Drive, Playa Vista, California, 90094, for Lighthouse VA Application Programming Interface (API) Platform Management services.
3. Description of the Supplies or Services: The proposed action is a modification to existing contract, 36C10B18C2756, to extend the period of performance by a total of 90 days consisting of a 60-day extension and one, 30-day optional task for transition services to the existing 12-month period of performance. The contractor shall provide services and support to design, develop, and maintain various aspects of the Lighthouse VA API Platform, including but not limited to platform design, API development and maintenance, developer documentation, and product management best practices to work with teams internal and external to VA, using modern software development methods and tools. This will provide increased, improved, and timely access to benefits and healthcare to Veterans via Decision Support Tool, VA online scheduling (VAOS), and other VA applications (i.e. Benefits Intake API, Claims API, Health API). As a result, Veterans have access and control over their data that has a meaningful impact on their lives and the lives of their families. The Lighthouse VA API Platform Management services are required to ensure the Lighthouse VA API environments remain operational. The period of performance is 60 days, plus one, 30-day optional task.
4. Statutory Authority: The statutory authority permitting other than full and open competition is 41 U.S.C.3304(a)(1) as implemented by the Federal Acquisition Regulation (FAR) Subpart 6.302-1 entitled, "Only One Responsible Source and No Other Supplies or Services Will Satisfy Agency Requirements."
5. Rationale Supporting Use of Authority Cited Above: The proposed source is AO JV I, LLC, 5389 Playa Vista Drive, Playa Vista, California, 90094. The original contract was awarded to AO JV I, LLC on September 21, 2018, as a result of a competitive action on the Federal Business Opportunities webpage. AO JV I, LLC is currently providing the services for the Lighthouse VA API Platform and is currently meeting the requirements of the contract. AO JV I, LLC has worked closely with VA over the past 11 months and has obtained and demonstrated significant knowledge of VA's current Lighthouse VA API environments, integrations, services and applications. Only AO JV I, LLC can provide the aforementioned Lighthouse VA API Platform services and support without any disruptions. VA anticipates award of a competitive task order (TO) under the Transformation Twenty-One Total Technology Next Generation (T4NG) contract vehicle on October 25, 2019, which would encompass the services detailed in Section 3. There

were unanticipated delays that occurred in August 2019 that delayed award of this competitive TO. The integrity of the procurement of the anticipated competitive TO was compromised which resulted in several organizational conflicts of interest (OCI). As a result, the competitive TO is delayed as the Government is required to review each OCI and make a determination and document the file accordingly.

VA's current contract with AO JV I, LLC is scheduled to expire on September 20, 2019. As previously stated, VA is in the process of competitively awarding a TO to replace the services covered by AO JV I, LLC. Due to the aforementioned issues with the competitive acquisition, the current acquisition is delayed. Loss of AO JV I, LLC support during this gap would significantly inhibit the Lighthouse VA API Platform and would severely impact VA's ability to complete its mission. Therefore, VA requires continued support of AO JV I, LLC to ensure there is no impact to VA's mission, Veterans or their families.

As a result of the Mission Act, which was signed into legislation by the President in June 2018 to streamline VA's community care programs, the Lighthouse VA API Platform teams are currently providing critical APIs to provide eligibility and facility information to the Decision Support Tool, VAOS, and other VA applications (i.e. Benefits Intake API, Claims API, Health API). This enables Veterans to receive community care for improved healthcare while also satisfying the legislative requirements of the Mission Act. Any lapse in development and support of these APIs would add serious risk to VA upholding the commitments and requirements of the Mission Act. In addition, the Benefits Intake API portfolio enables VA to better serve Veterans by enabling digital submission of claims to VA. The Benefits Intake API allows Veteran Service Officers working at Veteran Service Organizations to work more efficiently, allowing them to assist more Veterans. Any disruption in support would severely impact the Benefits Intake API portfolio by delaying benefit claims. The Claims API enables digital submission of disability compensation claims directly to the Veterans Benefits Management System, skipping the entire Central Mail process and moving the Veterans Benefits Administration to its mail-zero goal. Any downtime of the Benefits Intake API would severely impact VA. In the event of disrupted support, Veteran Service Officers would no longer be able to digitally submit claims or check the status in an automated fashion, re-introducing a significant amount of manual work, Central Mail would see an increase in manual processing effort and time, and there would be a delay in Veterans receiving claims decisions. The Health API program enables VA to provide better healthcare services to our Veterans. The Health API helps Veterans manage their health, view their medical records, schedule an appointment, find a specialty facility, and securely share their information with caregivers and providers. Any lapse in support would impact Veterans: Veterans would not be able to share their medical records with their caregiver and providers, Veterans access to basic health services would be more difficult and less timely, researchers would lose the ability to study healthcare data and provide innovative solutions, the ability to do procedure-specific research, and cost analysis would be severely impeded and would prevent any procedure specific research or cost-based analysis.

Only AO JV I, LLC can meet VA's requirements to support the Lighthouse VA API Platform management due to the complexity of the requirements. In addition to the lead time to award a new contract of approximately 60-90 days, any other source other than AO JV I, LLC would require significant ramp up time of approximately 30-60 days inclusive of system access in accordance with the Personal Identification Verification security requirements and elevated access privileges. These elevated privileges are required for multiple environments. Failure to continue to provide support for the Lighthouse VA API Platform would have a severe impact to VA and Veterans.

VA is requiring a 60-day extension to account for the anticipated award date of October 25, 2019. In addition, the Government is including one, 30-day optional task for transition support services as a new vendor will require at least 30 days to successfully onboard and receive access privileges to effectively sustain this system. Without the 30-day transition, the Lighthouse VA API Platform would be without support while a new contractor is onboarded leading to the critical failures.

6. Efforts to Obtain Competition: There is no competition anticipated for this acquisition which would satisfy the Government's requirements. Additionally, the proposed action will be synopsisized on the Federal Business Opportunities Page in accordance with FAR 5.201.

7. Actions to Increase Competition: VA anticipates awarding a competitive TO on October 25, 2019 under the T4NG contract vehicle.

8. Market Research: Market research was performed in June 2019 and eight vendors were identified on the T4NG contract vehicle that are able to provide the Lighthouse VA API Platform services. However, while these vendors have the requisite capabilities, the program office determined that none could transition immediately without a degradation or disruption of support. Any new vendor would require 30-60 days to onboard and undertake transition activities as discussed previously. As a result, there is no feasible manner for another vendor to provide the Lighthouse VA API Platform services without disrupted support.

9. Other Facts: None.