

JUSTIFICATION 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
2. Description of Action: The proposed action is for a one-year firm-fixed price (FFP) contract for brand name Vocera Communications, Inc. (Vocera) expansion solution including, hardware, software, maintenance, implementation, and support services.
3. Description of Supplies or Services: VA Veterans Health Administration (VHA) has a requirement to expand its existing Voice over Internet Protocol (VoIP) with Vocera infrastructure at the VA Medical Center (VAMC) in Salem, VA. The Salem VAMC's existing VoIP solution includes Extension HealthCare (now owned by Vocera) Engage integration infrastructure which integrates calls to the existing Jeron Electronics Systems, Inc. (Jeron) nurse call system. The Vocera solution shall expand the existing VoIP solution to include wireless system wearable communication badges for hand's free and voice-controlled communication. The Vocera solution expansion shall provide 200 communication badges, infrastructure for a badge configuration workstation, associated software licenses, and maintenance support. These badges enable hospital staff to wear a device that allows them to communicate with one another, and with patients, wirelessly without the need of a nurse call station or an anchored communication device. This wireless communication device operates hands-free using voice prompts through naturally spoken words. This is critical to the VAMC as it allows medical personnel greatly increased mobility, practicality, and productivity in its service to Veterans. The Vocera expansion shall be integrated with the existing Salem VAMC Jeron nurse call system for two-way communication between nurses, patient, and physicians. The solution shall enable voice calls to individuals, roles, and teams/groups without having to know who is on shift or what number to call. Calls are capable of automatic escalation to a pre-designed call flow path leading to no calls going unanswered. The Vocera expansion solution shall also integrate with Veterans Information Systems and Technology Architecture (VistA)/Computerized Patient Record System (CPRS) for one-way communication from VistA to wireless devices. This one-way communication will notify medical staff of critical lab and urgent orders that are entered into VistA/CPRS immediately which will decrease incidents of missed or delayed response to critical lab results and urgent orders. This expansion shall enable staff to have hands free, voice activated calling allowing medical staff to answer urgent calls while performing other tasks or are encumbered in decontamination clothing in an isolation room. Additionally, having hands free and voice activated communication devices greatly decreases the risk of infection and contamination through physical contact with devices. The Vocera expansion will expedite and streamline critical medical services to Veterans as the expansion will integrate with the existing Jeron nurse call system, IV pump alarms, patient calls, and bed exit alarms and routed to the correct provider for immediate attention. This will result in less nursing time wasted waiting for providers to call back to the nursing

station as the physician can call directly back to the nurse. In accordance with VA Directive 6512, effective October 12, 2017, VA sensitive information transmitted via wireless technologies must have Federal Information Processing Standards (FIPS) 140-2 compliance encryption approved and validated. This ensures that VA sensitive information is appropriately protected and secure when using wireless devices. As the Vocera expansion shall allow for wireless communication of sensitive medical information, it is required that the solution have FIPS 140-2 compliance. The contractor shall provide implementation and support services to develop proper workflows, database maintenance, end user training, and administrative training of the solution. All delivery, installation, configuration, testing, go-live, and training shall be completed within nine months from contract award. Maintenance support shall be for 12 months from date of go-live.

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: Based upon market research, as described in section 8 of this justification, it was determined that limited competition is viable among resellers of Vocera products. Brand name Vocera Exchange VoIP infrastructure is currently installed and operational at the Salem VAMC. Only the Vocera solution can expand on the existing infrastructure due to proprietary software and firmware source code. Vocera owns the proprietary rights to its software and firmware, including that from the existing Extension HealthCare products, and only Vocera has the required access to the source code and other proprietary data of its solution. The use of another brand name solution would require a complete replacement of the existing VoIP solution due to the proprietary nature of the Vocera Engage infrastructure. This would require the Government to replace the Engage integration infrastructure, which includes a call manager integrator server and associated hardware/software, resulting in up to two years delay and approximate duplicated costs of \$600,000, based on historical information, that would not be recovered through competition. Additionally, no other solution can meet VA's functional requirements. Specifically, only Vocera's solution provides wearable wireless hands-free voice activated communication badges. This functionality is critical to the improvement of medical staff services to Veterans. Furthermore, only the Vocera wearable communication badges have FIPS 140-2 certification for the wireless voice activation which is one of a kind for voice activated communication badges. Without FIPS 140-2 certification the Information Systems Security Officer (ISSO) will not allow this communication system to be installed on the VA Intranet. Instead it will need to be installed on a separate infrastructure network, which will require cabling throughout the entire hospital covering 1,200,000 square feet. This will increase cost of the communication system by several million dollars and cause a delay in installation. Finally, Vocera software is a proprietary product. Therefore, only Vocera or its resellers can provide maintenance and

support on its software product. The proprietary code is required to ensure all Vocera software updates and patches are properly pushed through the fielded software and to ensure the software is properly configured. Access to this code is also required to ensure all services provided on the Vocera software is properly configured. Only Vocera and its resellers can provide the associated knowledge base specific implementation and support services for the Vocera expansion solution as both require access to required proprietary code and technical data.

If the Vocera expansion is not procured, VA's existing VoIP system will continue to degrade until it is virtually unusable. Salem VAMC will continue to face difficulties in its ability to maintain acceptable levels of communication and patient care and vital patient information would be further compromised due to human error and delays. Additionally, the lack of a wearable, hands-free, and voice activated communication badge will increase risk of contamination within the hospital and response times to medical emergencies such as cardiopulmonary arrest, inclement weather, bomb threats, or active shooter scenarios will be delayed causing unnecessary loss of life.

6. Efforts to Obtain Competition: Market research was conducted, details of which are in section 8 of this justification. This effort did not yield any additional sources that can meet the Government's requirements. However, the undersigned VA technical representative determined that limited competition is available among authorized resellers for brand name licenses, as well as software maintenance and support. In accordance with FAR 6.302-1(c)(1)(ii)(c) and 5.106(a)(6) this justification shall be posted with the solicitation. Furthermore, the proposed action will be synopsized on the Federal Business Opportunities Page in accordance with FAR 5.201. Any proposals that are received shall be evaluated.

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.

8. Market Research: Market research was conducted by Government technical experts during June 2019 to ascertain the ability of any other source besides Vocera to expand the existing VA VoIP solution. Government technical experts conducted thorough reviews of product information via web searches for similar solutions from Cisco Systems, MINITOR, Honeywell, and RMS Omega Healthcare Technologies. Through this market research, the Government technical experts determined that due to the unique patented design, only the Vocera solution can provide FIPS 140-2 compliant wearable wireless hands-free voice activated communication devices which are critical to the Salem VAMC for increasing patient care and safety. Furthermore, only the Vocera solution can integrate with the existing Extension HealthCare infrastructure at the Salem VAMC. Therefore, only Vocera can expand the current solution and meet the Government's requirements. On June 26, 2019 the Government directly contacted Vocera representatives and confirmed that Vocera's source code is proprietary and not sold to outside parties.

9. Other Facts: None.

10. Technical and Requirements Certification: I certify that the supporting data under my cognizance, which are included in this justification, are accurate and complete to the best of my knowledge and belief.

11. Fair and Reasonable Cost Determination: I hereby determine that the anticipated price to the Government for this contract action will be fair and reasonable based on based on analysis of the quotes against the Independent Government Cost Estimate and commercial catalog pricing.

12. Procuring Contracting Officer Certification: I certify that this justification is accurate and complete to the best of my knowledge and belief.

Approval

In my role as procuring activity Advocate for Competition, based on the foregoing justification, I hereby approve the acquisition of Vocera expansion solution including, hardware, software, maintenance, implementation, and support services on an other than full and open competition basis pursuant to the statutory authority cited in paragraph 4 above, subject to availability of funds, and provided that the property and services herein described have otherwise been authorized for acquisition.