DEPARTMENT OF VETERANS AFFAIRS
Justification and Approval for
Other Than Full and Open Competition

Acquisition Plan Action ID: 36C776-26-AP-0742

1. **Contracting Activity:**
Veterans Health Administration (VHA), Program Contracting Activity Central (PCAC) is preparing a Deign-Bid-Build procurement for the construction of the Electronic Health Record Modernization (EHRM) Infrastructure Upgrades at the Togus Veterans Affairs (VA) Medical Center (VAMC) in Augusta, Maine (Project #402-22-700).

2. **Nature and/or Description of the Action Being Processed:**
This justification is to support the EHRM Infrastructure Upgrades construction project at the Togus VAMC that will be awarded as a Firm-Fixed-Price contract. This justification is for other than full and open competition for the procurement of certain construction materials. The use of a particular brand name for the items listed below accommodates standardization of these items throughout the facility. All items are subject to Buy American clauses and provisions in the RFP.

   a. Security System
      Security Cameras - Axis M3057-PLVE MKII,
      Physical Access Controls - HID pivCLASS RP40-H Wall Switch Reader

   b. Door Hardware
      Sargent Locksets and Sargent 6300 keying system

3. **Description of Supplies/Services Required to Meet the Agency's Needs:**
This procurement is to construct the EHRM Infrastructure Upgrades construction project at the Togus VAMC. The scope includes everything necessary to migrate from the existing Computerized Patient Record System (CPRS) to a new Electronic Health Records Modernization (EHRM) platform and will meet the requirements of the Department of Veterans Affairs. There are three brand name items listed for which the VA is not able to accept equal or alternate items. The value of these items is listed below and the VAAR construction magnitude for the entire project is between $50,000,000 and $100,000,000.

   a. Security System – Security Cameras
      i. Axis M3057-PLVE MKII
      ii. Value: [redacted]
      iii. Description: Complete installation and integration of indoor/outdoor fixed mini dome camera system to maintain proper operation of existing security system.

   b. Security System – Physical Access Controls
      i. HID pivCLASS RP40-H Wall Switch Reader
      ii. Value: [redacted]
      iii. Description: Complete installation and integration of card reader keypad combo to match existing to ensure and maintain proper operation of the existing physical access control system thereby safeguarding access to all areas of the VAMC to authorized personnel.

   c. Door Hardware
      i. Sargent Locksets with Sargent 6300 LFIC keying system
      ii. Value: [redacted]
      iii. Description: Complete installation of door hardware and locksets to match the existing to ensure and maintain proper compatibility of the existing door hardware and locksets.

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 41 USC §3304(a)(1), and as implemented by RFO 6.103-1.
( ) (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):

These items have been standardized throughout the Togus VAMC. Installing a different manufacturers' system will create significant duplication in costs and/or disruption in services for the facility, and in most cases the equipment will not function properly. The use of these items is essential to the Government's requirements, thereby precluding consideration of products manufactured by other companies. The specific impact for not using the brand name items is listed below:

a. Security System – Security Cameras
    i. Axis M3057-PLVE MKII cameras
    ii. Impact: Axis video surveillance cameras integrate with the existing security system already in use at Togus VAMC. Market research has been conducted periodically over the years (most recent fall 2018), and Axis cameras have been found to be the clearest, most reliable cameras at a reasonable cost making them the best value for the VA. As a result, Togus VAMC has standardized use of these cameras. The Axis cameras match existing and will keep maintenance and replacement consistent. Using another product would require significant changes to the existing system for integration and compatibility, thereby increasing project costs and risks of potential system downtime, loss of operability, and security gaps during transition.

b. Security System – Physical Access Controls
    i. HID pivCLASS RP40-H Wall Switch Reader
    ii. Impact: HID physical access controls are required for functionality and security. HID is required for consistency and continuity related to facility security as the current system uses HID. Using another provider would mean a second front end security system which again would have to be installed in several locations including dispatch which cannot accommodate another system without a major renovation. This would be duplicative and not cost effective.

c. Door Hardware
    i. Sargent Locksets with Sargent 6300 LFIC keying system
    ii. Impact: Togus VAMC currently uses Sargent door hardware to match the existing hardware in use at the facility. Replacing the existing Sargent locksets would have a direct and measurable impact on security operations, project cost, and schedule. Introducing a new lockset manufacturer would require reconfiguration of the existing access control system, campus-wide re-keying, and potential replacement of associated hardware and software components to achieve compatibility. These actions would increase installation complexity, extend construction and commissioning timelines, and elevate the risk of system failures during cutover. From an operational standpoint, replacement would disrupt established maintenance practices and require additional training for facilities and security staff, increasing long-term operational burden. Furthermore, during construction and transition, the presence of mixed or temporary locking systems would create vulnerabilities in access control, increasing the risk of unauthorized access to patient care and support areas. Collectively, these impacts introduce unnecessary security exposure,

lifecycle cost increases, and schedule risk without providing a corresponding improvement in performance or functionality.

6. **Description of Efforts Made to ensure that offers are solicited from as many potential sources as deemed practicable:**
In accordance with the Competition in Contracting Act (CICA), the components listed above are identified as brand name; however, the overall procurement will be competed as an unrestricted full and open competition. This Justification for Other Than Full and Open Competition will be posted to www.sam.gov with the solicitation.

7. **Determination by the Contracting Officer (CO) that the Anticipated Cost to the Government will be Fair and Reasonable:**
The Government estimate was prepared and provided by the Contracting Officer's Representative (COR). The anticipated price to the Government for the items requested to be brand name is approximately [redacted].

The items for which brand name approval is being requested are subsequent components to the overall construction project. This procurement will be competed and based on competition; the CO will make a determination of fair and reasonable pricing prior to award.

8. **Description of the Market Research Conducted and the Results, or a Statement of the Reasons Market Research Was Not Conducted:**
The market research for the required brand name items was conducted and prepared by the COR and A/E. This information was then shared with the CO for further review. The CO is in concurrence with information provided that supports these brand name items. Approval of the items as brand name only is critical for the overall efficiency of the completed project and the Togus VAMC facility as a whole.

The market research concerning the required brand name items was previously conducted when these items were originally purchased and updated recently as appropriate. The manufacturers and products are exclusively acceptable for reasons outlined in this J&A.

An additional purpose of the market research was to ensure requirements of the Buy American Act (BAA) have been met for each of the brand name items identified. The contracting team reviewed each of the compliance standards for the BAA and compared it with the components in each of the brand name items. After their thorough review, they have concluded that each item is in compliance with the BAA. See an overview below for each item:

a. Security System – Security Cameras
    i. Axis M3057-PLVE MKII
    ii. Based on information obtained from the GSA Advantage website, this item's country of origin is the United States so there are no concerns regarding "Buy American" compliance.

b. Security System – Physical Access Controls
    i. HID pivCLASS RP40-H Wall Switch Reader
    ii. Based on information obtained from the GSA Advantage website, this item's country of origin is the United States so there are no concerns regarding "Buy American" compliance.

c. Door Hardware
    i. Sargent Locksets with Sargent 6300 LFIC keying system
    ii. Based on information obtained from the GSA Advantage website, Sargent brand items' country of origin is the United States so there are no concerns regarding "Buy American" compliance.

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

New components must be able to tie into or function with an existing and operational system including the use of proprietary software. At this time, there are no competing vendors whose products that we are aware of that have the programming rights to the systems and products that are fully compatible with the existing systems being used at Togus VAMC.

10. **Listing of Sources that Expressed, in Writing, an Interest in the Acquisition:**
Not applicable. It is the responsibility of the offerors, and the general contractor awarded the project to locate suppliers and obtain pricing for all materials and components, including the items listed in this justification.

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**:
There will be competition for the overall procurement. It will be the responsibility of the offerors to obtain pricing from the suppliers of the items and to submit a competitive proposal for the project.

12. **Requirements Certification:** I certify that the requirements outlined in this justification are Bona Fide needs 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.

ABIGAIL CAMPBELL
Digitally signed by ABIGAIL CAMPBELL
Date: 2026.03.24 07:40:19 -04'00'

Abigail Campbell
General Engineer/Project Manager/COR
Togus VAMC

Date

13. **Approvals in accordance with the VHAPM Part 806.3 OFOC SOP:**

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

JOELLE MASCARENAS
Digitally signed by JOELLE MASCARENAS
Date: 2026.03.24 06:19:29 -10'00'

Joelle Mascarenas
Contracting Officer
Program Contracting Activity Central

Date