ATTACHMENT VAAM M807-C and VAAM M807-D
Consolidation, Bundling, and Substantial Bundling Determination and Findings

EBSCO – CINAHL, Medline, and PBSC
36C776-26-AP-1112

FINDINGS

I. INTRODUCTION.

The Program Contracting Activity Central (PCAC) intends to award a national, enterprise-wide, firm-fixed-price contract to EBSCO Information Services for licensed electronic access to three proprietary databases: (1) CINAHL Ultimate, (2) Medline Complete, and (3) the Psychology & Behavioral Sciences Collection (PBSC). Market research supports that consolidation, bundling, and substantial bundling of these subscriptions into a single, sole-source award is necessary and justified to meet Veterans Health Administration (VHA) mission needs.

II. BACKGROUND.

A. This procurement action is for the purchase of a VA enterprise-wide license for electronic access to the three EBSCO products listed above, with EBSCO as a sole source vendor: the Cumulative Index to Nursing and Allied Health Literature with Full Text database (CINAHL Ultimate), Medline Complete, and the Psychology and Behavioral Sciences Collection (PBSC). The titles provided by the subscription to CINAHL are heavily relied on by VA librarians, clinicians, researchers, and educators; they provide knowledge-based information that covers journal literature in the field of nursing and allied health professions, as well as related books, dissertations, and conference proceedings. The content included in Medline Complete provides access to an extensive collection of full-text biomedical and health sciences journals that are critical to support physician clinical decision-making. In addition, this database includes full-text access to journals that are not available through other vendors, which contain important scientific knowledge needed to provide high-quality care. The Psychology & Behavioral Sciences Collection from EBSCO is a searchable database and access to full-text scientific journals centered on psychology, behavioral sciences, and related disciplines.

The current contract with EBSCO (Contract No. 36C77623P0062) provides subscription access solely to CINAHL Complete. Medline Complete and PBSC are not included under this agreement. The contract consists of a base period and two option years, with a total value of $5.5 million. Although the period of performance is currently scheduled to conclude on September 17, 2026, EBSCO and the Department of Veterans Affairs have reached an agreement to modify the contract to shorten the period of performance to May 31, 2026. This modification will include the deobligation of excess funds resulting from the reduced period of performance.

In addition, there are five active contracts related to Medline Complete and CINAHL Complete; however, these awards were issued at the individual facility level and do not constitute VISN-wide or enterprise-wide coverage. The facilities holding these contracts are:

1. Bay Pines Healthcare System (CINAHL Complete and Medline Complete)
2. Cleveland Medical Center (Medline Complete with Full Text)
3. Memphis VA Medical Center (Medline Complete)
4. North Texas Healthcare System (Medline Complete)
5. Richard L. Roudebush VA Medical Center (CINAHL Complete)

These five facility-level contracts were awarded to two SDVOSB vendors. Graham Advisory Network, Inc. (GAN) received four of the awards, while J.E. Federal Enterprises, LLC received one. The combined value of these contracts is $1.3 million. There were no contracts found for the PBSC requirement.

This is a new requirement.

Type of contract: Firm Fixed Price.

Estimated value: $[redacted] in the base year and including 4 Option years for a total of [redacted]

Period of Performance:
Base Year: 06/1/2026 – 05/31/2027
Option Year 1: 06/1/2027 – 05/31/2028
Option Year 2: 06/1/2028 – 05/31/2029
Option Year 3: 06/1/2029 – 05/31/2030
Option Year 4: 06/1/2030 – 05/31/2031

B. Applicable Statutes/ Regulations.

Authority	Key Focus
15 U.S.C. § 644(e)	Procurement strategies; contract bundling
15 U.S.C. § 657q	Consolidation of contract requirements
RFO 2.101	Definitions of words and terms

Authority	Key Focus
RFO 7.104	General procedures
RFO 7.107	Additional requirements for acquisitions involving consolidation, bundling, or substantial bundling
VAAR 819.201 and 819.202	General policy and specific policies
13 C.F.R. § 125.2	Small business definitions in teaming/bundling

C. **Market Research.** Market research has been conducted in accordance with RFO 10.001 and has demonstrated that—

☒ Consolidation and Bundling is necessary and justified (see RFO 7.107-1 and RFO 7.107-2).

☒ Substantial bundling is necessary and justified (see RFO 7.107-2(c)(6)).

[redacted]

[redacted]

III. CONSOLIDATION AND BUNDLING.

A1. Benefits.

The consolidation and bundling of these subscriptions under a single national contract supports the Department of Veterans Affairs' mission to deliver high-quality care by ensuring equitable and consistent access to evidence-based clinical and research resources across all VA medical facilities. Under prior decentralized purchasing, only 33 percent of facilities subscribed to Medline Complete at a combined cost of approximately $1 million. Through a consolidated national procurement, 100 percent of VA facilities will receive access—tripling coverage—for a total cost of $1.9 million. This approach increases availability of critical clinical information while freeing approximately $1 million in facility-level funds that can be redirected to direct Veteran care and other mission-critical priorities.

A2. Mission success

The consolidation and bundling directly advances VA's mission to deliver high-quality care for Veterans by ensuring every medical facility has equitable access to critical, evidence-based clinical and research resources. Under prior decentralized purchasing, only about 33 percent of facilities subscribed to Medline Complete at a combined annual cost of approximately $1 million. Through a single national contract, all VA facilities—tripling the scope of access—will receive Medline Complete coverage for roughly $1.9 million. This enterprise approach not only expands reach and standardizes access across the system, but also frees an estimated $1 million in local funds that can be redirected toward direct Veteran care and higher-priority clinical needs.

Bundling CINAHL Ultimate with Medline Complete and PBSC yields benefits that can only be achieved through a single, bundled and consolidated acquisition and therefore supports the justification required for substantial bundling and consolidation. The upgrade from CINAHL Full Text to CINAHL

Ultimate expands access from approximately 320 journals to roughly 1,837 journals—providing more than a sixfold increase in nursing and allied health literature. This significant expansion of content materially enhances VA's national clinical knowledge infrastructure and directly strengthens evidence-based practice, clinical decision-making, and workforce education across all VA medical centers.

Cost Comparison Table: Bundled vs. Separate Subscriptions

Category	Cost	Notes
Estimated cost if awarded separately	[redacted]	Base year; individual VA facility subscriptions
Cost under a single bundled contract	[redacted]	Base year; enterprise-wide scope
Total cost	[redacted]	Difference between separate vs. bundled
Percentage savings	Approximately 76%	Driven by economies of scale, reduced overhead, centralized management

Managing these proprietary EBSCO resources under a unified, enterprise-wide contract also delivers substantial efficiencies: it stabilizes subscription costs by reducing exposure to annual price escalations, ensures consistent coverage across all facilities, and consolidates oversight into a single management framework appropriate for a high-dollar, nationally scoped requirement. These benefits—improved mission support, cost control, reduced administrative burden, and strengthened program oversight—cannot be achieved through separate or decentralized procurements, thereby satisfying the statutory and regulatory thresholds for substantial bundling and consolidation.

Regional or Agency-wide contract implications:

The proposed consolidation and bundling yields enterprise-level benefits that enhance acquisition efficiency, standardization, and oversight in accordance with Federal and VA procurement policy. The national contract replaces an estimated 70–80 decentralized local or regional procurements previously executed by individual VA medical facilities and Veterans Integrated Service Networks (VISNs). Eliminating this fragmented procurement approach reduces administrative burden, establishes uniform terms and pricing, and ensures consistent access, performance expectations, and support across all Veterans Health Administration (VHA) locations.

Centralized administration under a single contractual vehicle improves end-to-end visibility, enables effective application of economies of scale, and facilitates oversight commensurate with a nationally scoped, high-dollar sole-source requirement. This structure is aligned with regulatory expectations for appropriate internal controls and documentation. Additionally, the consolidation significantly reduces the volume of required procurement actions and associated staff hours, thereby optimizing acquisition workforce resources at both the national and field levels.

B. Procurement Strategy.

This consolidation does not adversely affect Small Business participation or set-aside opportunities. All three products—CINAHL Ultimate, Medline Complete, and PBSC—are proprietary to EBSCO Information Services and are available exclusively from the original developer. Small Business resellers cannot satisfy the required 50 percent performance requirement because they neither create nor control the licensed content and serve only as pass-through intermediaries. Their involvement adds an average fee of approximately 3 percent without altering scope, capabilities, or deliverables.

At the national level and associated contract value, introducing a Small Business intermediary would be cost-inefficient and would not provide a substantive benefit to the Government. VA will continue to engage Small Business partners on other open-market and competitive procurements where their participation is feasible, compliant, and value-added.

Additionally, PBSC has been deliberately separated from a prior bundled arrangement in which it was paired with a non-sole-source resource. Transitioning PBSC to this sole-source EBSCO contract enables the companion product to be competed independently on the open market. This action increases competition for that product and preserves future opportunities for both Small and Large Business vendors.

The applicable NAICS code for this requirement is 519290 (Web Search Portals and All Other Information Services).

C. Alternative Approaches.

Issue independent solicitations for each major function. Each function would be awarded to separate contractors, with the Government managing integration across contracts.

Benefits (Lesser Consolidation):

- Enables specialized small businesses to compete for discrete service lines (supports small business participation consistent with FAR 7.107 bundling considerations).
- Potentially sharper technical focus and niche expertise for each function.

Rationale for Not Selecting:

- **Loss of Economies of Scale:** Market research indicated volume pricing and cross-functional staffing efficiencies would be reduced, with a high probability of increasing the contract price(s) over the consolidated baseline.
- **Integration & Interoperability Risk:** Multiple contractors would complicate coordination of clinical operations, device uptime, and change management, resulting in higher schedule risk.
- **Increased Administrative Burden:** Government would assume system integration responsibility across multiple contracts, increasing COR oversight, monitoring, and invoice reconciliation workload.
- **Continuity of Care Impacts:** Fragmentation of services could delay incident response, creating potential mission risk to patient care.
- **Proprietary Source:** EBSCO is the exclusive provider of enterprise-level contracts for these database subscriptions. Access is delivered through EBSCOhost, EBSCO's proprietary flagship search platform, which is not available to resellers.

D. Negative impact.

Although the consolidated, sole-source approach does limit the number of potential small business prime contracting opportunities, these impacts do not outweigh the agency's need to award to the proprietary source that is uniquely capable of meeting the full requirement. Market research confirms that the essential components, technical data, and interoperability necessary for successful performance are proprietary to the identified source, and no small business possesses the rights or capabilities required to perform the work independently. As a result, separating the requirement into smaller acquisitions would introduce significant performance, compatibility, and cost risks without creating meaningful opportunities for small business participation. To the extent practicable, the agency will require small business subcontracting, participation goals, and related measures to ensure that small firms are still meaningfully engaged. In balance, the proprietary nature of the requirement, the operational risks associated with fragmentation, and the sole-source justification collectively outweigh the limited negative impacts on small business contracting.

E. Inclusion of small business concerns.

Because the requirement is proprietary and can only be fulfilled by a single responsible source, there are no meaningful subcontracting opportunities available for small business participation. The Government will engage the VA Small Business Specialists and OSDBU to ensure full visibility of the requirement and to verify that no SDVOSB or VOSB could meet the proprietary technical needs.

IV. SUBSTANTIAL BUNDLING.

A. Specific benefits anticipated from substantial bundling.

This consolidation provides agency-wide benefits by improving acquisition efficiency, consistency, and oversight. The national contract replaces approximately 70 to 80 separate local and regional purchases previously executed by individual VA medical facilities and Veterans Integrated Service Networks (VISNs). Eliminating this fragmented approach reduces administrative burden, standardizes terms and pricing, and ensures uniform access and support for all VHA facilities.

B. Assessment of impediments to small business participation resulting from substantial bundling.

This consolidation does not create barriers for Small Business participation nor eliminate any viable set-aside opportunities. All three required products— CINAHL Ultimate, Medline Complete, and the Psychology & Behavioral Science Collection (PBSC) - are proprietary to EBSCO Information Services and can only be obtained directly from the original publisher. Small Business resellers cannot meet

the required 50 percent performance standard because they do not produce or control the licensed content; they function solely as pass-through intermediaries, typically adding an average 3 percent fee without providing additional value or altering the scope of work. As a result, substantial bundling does not reduce competition among Small Businesses, as no Small Business entities are capable of performing the requirement.

C. Actions designed to maximize small business participation as contractors, including provisions that encourage small business teaming.

To maximize opportunities for Small Business participation, the VA conducted outreach through a Sources Sought/Request for Information posted on SAM.gov and distributed an additional RFI directly to verified SDVOSB/VOSB vendors under NAICS 519290. These actions were intended to identify any Small Business entities capable of providing the required subscription services or participating as part of a teaming arrangement. However, because all required products are proprietary to EBSCO Information Services and can only be obtained from the original publisher, there is no viable opportunity for Small Business prime contractors or teams to perform the requirement. Small Business resellers do not produce or control the licensed content and therefore cannot meet performance requirements under a set-aside or teaming structure. As a result, while the VA took meaningful steps to assess Small Business capability, no feasible Small Business contracting or teaming opportunities exist for this requirement.

D. Actions designed to maximize small business participation as subcontractors (including suppliers) at any tier under the contract, or order, that may be awarded to meet the requirements.

Opportunities for small business participation as subcontractors were evaluated; however, none exist due to the proprietary nature of the required products. CINAHL Ultimate, Medline Complete, and the Psychology & Behavioral Science Collection (PBSC) are exclusively produced, licensed, and distributed by EBSCO Information Services. As the sole owner and publisher of the content, EBSCO does not utilize subcontractors or third-party suppliers for any portion of this subscription service. There are no ancillary service components (installation, configuration, maintenance, or support) that could be subcontracted to small businesses. Because the performance requirements consist solely of delivering licensed digital content controlled by a single source, no viable subcontracting or supplier roles are available for small business participation at any tier.

E. Determination that the anticipated benefits of the proposed bundled contract or order justify its use.

Centralized management under a single contract provides better contract visibility and leverages economies of scale, while also ensuring appropriate scrutiny

consistent with higher-dollar, nationally scoped sole-source agreements. The arrangement will also result in fewer procurement actions and related staff hours, optimizing acquisition resources at both national and field levels.

F. Alternate strategies that would reduce or minimize the scope of the bundling, and the rationale for not choosing those alternatives.

Several alternative approaches were evaluated, including (1) maintaining decentralized local or VISN-level purchasing, (2) awarding separate contracts for each individual product line, and (3) attempting a partial set-aside for small business intermediaries. These alternatives were not selected for the following reasons:

- Decentralized purchasing would continue current inefficiencies, including inconsistent pricing, duplicate actions, and variable access across VA facilities.
- Awarding separate contracts for each product line would not reduce cost or administrative effort, as all three products are still proprietary to the same source and would require three separate sole-source actions with no increase in competition.
- A small business set-aside or reseller approach is not feasible because resellers lack the ability to meet the required performance standards and add cost without providing additional value.

For these reasons, bundling the requirement under a single national contract is the most efficient, cost-effective, and mission-aligned strategy to meet VHA's needs.

V. DETERMINATION.

Based on the above, I hereby determine that in accordance with RFO 7.107, that consolidation, bundling, and substantial bundling are necessary and justified.

PREPARED BY: I hereby certify that the supporting information and data used to complete this determination is accurate and complete to the best of my knowledge and belief.

[redacted]

REVIEWED BY: I have reviewed this determination and find it to be accurate and complete to the best of my knowledge and belief.

[redacted]

Concur:

[redacted]

[redacted]