Federal Supply Schedule Limited-Sources Justification

Acquisition Title: ClaimsCore Program Management Office (PMO) Support Services

Agency: Centers for Medicare & Medicaid Services (CMS), Office of Information Technology (OIT)

Acquisition Year: Fiscal Year (FY) 2026

Author: [redacted]

1. Description of Action

This is a Limited Source Justification authorizing the award for ClaimsCore Program Management Office (PMO) Support Services issued under the Federal Supply Schedule (FSS) / General Services Administration (GSA) Multiple Award Schedule (MAS) program during the ClaimsCore Proof of Concept (POC) phase and implementation period, without providing fair opportunity to all schedule contractors, pursuant to GSAM 538.7104-3 and FAR 8.405-6(a)(1)(i)(B).

Nature

☒New Requirement
☐Follow-On Order
☐Modification of Existing Purchase Order / Contract Number

Contract Type

☒Firm-Fixed Price
☐Time and Materials
☐Cost Plus Fixed Fee (CPFF)
☐Term
☐Completion
☐Cost Plus Award Fee (CPAF)
☐Other:

Total Projected Cost / Price (Aggregate Estimated Value): Base Period - $1,437,500, Option Period 1 - $11,500,000, Option Period 2 - $14,375,000 = $27,312,500 (inclusive of base period and all option periods)

Funding Source(s): [redacted]

Name of Proposed Contractor: Deloitte Consulting LLP
GSA MAS Contract Number: 47QRAA18D001P
Street Address: 1919 North Lynn Street, Arlington, VA 22209
City, State, Zip: Arlington, VA 22209

2. Description of Supplies or Services

CMS requires a fully operational Program Management Office (PMO) to support the ClaimsCore Proof of Concept (POC) and initial implementation phases. ClaimsCore is CMS's initiative to modernize the Medicare Fee-for-Service (FFS) claims processing infrastructure, a mission-critical system that processes approximately 1.2 billion claims per year and administers over $460 billion in annual Medicare

payments. The current infrastructure relies on COBOL-based legacy mainframe systems that present significant operational, financial, and programmatic risk.

This order will cover the following five (5) task areas:

1. **Program Governance and Oversight** — Establishing and maintaining governance frameworks, decision-support structures, and program controls for the ClaimsCore POC and implementation phases.
2. **Vendor Artifact and Commitment Tracking (D-03)** — Initializing and maintaining the vendor artifact and commitment tracker within 10 business days of each order's period of performance commencement; ongoing tracking throughout the POC.
3. **Governance, Stakeholder, and Engagement Mapping (D-02)** — Publishing and maintaining the initial governance, stakeholder, and engagement map within 10 business days of each order's period of performance commencement.
4. **Integrated Master Plan/Schedule (IMP/S) Validation** — Reviewing and validating vendor-submitted IMP/S materials from day one of the POC to ensure alignment with CMS program objectives and milestones.
5. **Program Management Support and Reporting** — Providing ongoing PMO support, status reporting, risk management, and executive-level briefings throughout the POC and initial implementation phases.

Authority

ORDER AGAINST FSS: ORDER AGAINST FSS: Authority of the Multiple Award Schedule Program, Title III of the Federal Property and Administrative Services Act of 1949 (41 U.S.C. 251, et seq.); Title 40 U.S.C. 501, Services for Executive Agencies; and Section 803 of the National Defense Authorization Act of 2002 (PL 107-107) and implemented by GSAM 538.7104-3. Mark the applicable exception and for each discuss how the cited authority applies in accordance with GSAM 538.7104-3.

Basis for Limiting Competition: 538.7104-3 (b)(1)(i) - The need is of such unusual urgency that following the procedures would result in unacceptable delays in fulfilling that need.

Basis for Determination

A. Unusual and Compelling Urgency

The ClaimsCore POC is scheduled to begin **June 2026**, with full operational capability of the PMO required within **10 business days** of contract award:

- The PMO must be in place at POC kickoff to establish governance infrastructure.
- The Vendor Artifact and Commitment Tracker (D-03) must be initialized within 10 business days of each order's period of performance commencement.
- The Governance, Stakeholder, and Engagement Map (D-02) must be published within 10 business days of each order's period of performance commencement.
- IMP/S validation must begin from day one of the POC.

A competitive acquisition on a standard timeline — even an expedited one — cannot be completed in time to meet these requirements for this order. The Government's interest would be seriously damaged if competition were pursued, as it would result in either a delayed POC kickoff or an ungoverned POC phase without adequate program management infrastructure.

B. Qualifications of Proposed Contractor

Deloitte Consulting LLP possesses a combination of qualifications that no other identified source can match within the required timeframe:

a) **Medicare Claims Modernization Domain Expertise:** Deloitte has demonstrated, specialized expertise in Medicare FFS claims processing modernization, including deep knowledge of COBOL/IBM mainframe legacy systems and the technical and programmatic complexities of large-scale claims system transformation.

6. **Active CMS Security Clearances:** Deloitte personnel supporting this requirement hold active CMS security clearances and HSPD-12 credentials. Obtaining equivalent clearances for personnel from an alternative source would require months and cannot be accomplished within the 10-business-day mobilization window.

b) **Established CMS Contractual Vehicles and Negotiated Rates:** Deloitte holds existing CMS contracts with established labor categories, ceiling rates, and negotiated terms, enabling rapid order placement and price reasonableness determination without the delays associated with establishing a new contractual relationship.

c) **Integrated PMO Team Availability:** Deloitte has an available, qualified team of approximately 10 FTEs with the specific skill sets required — program management, Medicare claims domain expertise, governance framework development, and IMP/S validation — who can mobilize within 10 business days.

3. Market Research Summary

Market research was conducted in accordance with FAR Part 10 and documented in the FY26 Streamlined Market Research Report – ClaimsCore PMO Support Services (dated June 2026). The research evaluated the following three (3) firms:

Firm	GSA MAS Schedule	Medicare Claims Expertise	Active CMS Clearances	10-BD Mobilization Capable	PMO Team Available
Deloitte Consulting LLP	Yes	Yes — Demonstrated	Yes	Yes	Yes
Accenture Federal Services	Yes	Partial	Partial	No	No
Boston Consulting Group (BCG)	Yes	Limited	No	No	No

Research Methodology: Review of GSA MAS schedules; analysis of existing CMS contract vehicles; interviews with CMS program personnel; review of prior performance records.

Finding: Market research conclusively demonstrates that Deloitte Consulting LLP is the only source capable of providing the required ClaimsCore PMO Support Services within the required timeframe and at the required level of quality. No other GSA MAS schedule holder — large or small business — was identified as capable of meeting the full scope of requirements within the 10-business-day mobilization window.

Price Reasonableness

The Contracting Officer will determine that the price is fair and reasonable based on:

1. **Comparison to Existing GSA MAS Rates:** Deloitte's GSA MAS contract 47QRAA18D001P establishes pre-negotiated labor category rates. Order pricing will be compared against these established rates.
2. **Comparison to Existing CMS Contracts:** Deloitte holds existing CMS contracts with established labor categories and ceiling rates. Order pricing will be benchmarked against rates on comparable CMS program management contracts.
3. **Fixed-Price Structure:** The order will be Firm-Fixed Price, providing the Government with cost certainty and eliminating cost overrun risk.
4. **Independent Government Cost Estimate (IGCE):** An IGCE will be prepared prior to award, providing an independent basis for price reasonableness determination.

4. Actions to Increase Competition:

Per the ClaimsCore PWS (Section VII, Key Assumptions), this order is explicitly identified as a bridge acquisition. CMS intends to award a competitive follow-on PMO support contract upon completion of the POC phase. The sole source determination is limited to the period necessary to support the POC and initial implementation phases while a competitive follow-on is developed and awarded.

This limitation appropriately restricts the scope and duration of the determination while protecting the Government's long-term competitive interests.

5. Any other facts supporting the justification: Not Applicable (N/A)

Approvals:

1. **Program Office Certification:** This is to certify that portions of this justification have been developed by the undersigned program office personnel, including supporting information and/or data verifying the Government's minimum needs, schedule requirements and other rationale, which form the basis for this Limited Source Justification.

   [redacted]
   Contracting Officer Representative (COR) / Date

   [redacted]
   Program/Project Manager (P/PM) / Date

2. **Contracting Officer Certification and Best Value Determination:**
   This is to certify that the justification for the proposed acquisition has been reviewed and that to the best of my knowledge and belief, the information and/or data provided to support the rationale and recommendation for approval is accurate and complete.

   By my signature below, after review of the relevant documents, I have determined that the order subject to this Limited-Sources Justification represents the best value for the Government as set forth in FAR 8.404(d) and constitutes a fair and reasonable price. The basis for my determination is as follows:
   [redacted]
   Contracting Officer / Date

3. **CMS Competition Advocate Approval**
   I hereby confirm the circumstances described above apply and approve the Limited Source Justification.

   [redacted]
   Name / Date

4. **Head of Contracting Activity (HCA) Approval**
   I hereby confirm the circumstances described above apply and approve the Limited Source Justification.

   [redacted]
   Name / Date

5. **Office of Small and Disadvantaged Business Utilization**

   _____N/A_____
   Name / Date

6. **OGC Legal Review**

_____N/A_____
Name / Date

7. **HHS Competition Advocate Approval**

_____N/A_____
Name / Date

8. **Senior Procurement Executive (SPE) Approval**
Based on the foregoing justification, I hereby confirm the circumstances described above apply and approve the Limited Source Justification.

_____N/A_____
Name / Date