Justification for a Sole Source Acquisition
FAR Subpart 13.501

1. **Identification of the agency and contracting activity.**

   a. **Federal agency and contracting activity.** Department of Health and Human Services, Assistant Secretary for Administration, Office of Acquisition Management Services

   b. **Requiring activity.** Office of the National Coordinator for Health IT, Data Analysis Branch

2. **Nature and/or description of the action being approved**

   This action is to award a sole source, firm fixed price, non-severable task order for analytic support services to clean, analyze, evaluate, and disseminate findings from the 2025 National Survey of U.S. Digital Health Companies, and to support longitudinal assessment of interoperability and API adoption aligned with federal health IT policy priorities.

3. **Description of the supplies or services required to meet the agency's needs (including the estimated value).**

   a. **Project title.** National Survey of U.S. Digital Health Companies

   b. **Project description.**

   The contractor will provide end to end analytic and dissemination support for the 2025 national survey of digital health companies, including data cleaning, preparation of analytic datasets, statistical analysis, development of tables and figures, and production of policy relevant outputs. The work includes longitudinal comparison to prior survey waves, evaluation of survey instrument performance, and development of dissemination materials to inform ONC policy priorities related to interoperability, APIs, and implementation of the 21st Century Cures Act. The contractor will also support stakeholder engagement through presentations and collaborative development of dissemination products.

   c. **Proposed contract/order type.**

   Firm fixed price, non-severable services

   d. **Total estimated dollar value and performance/delivery period.**

   Total Estimated Dollar Value: [redacted]

   Period of Performance: 12-month base period

   e. **Name and address of the proposed contractor.**

University of California, San Francisco (UCSF)
School of Medicine
10 Koret Way, #325
San Francisco, CA 94117

4. Identification of the statutory authority permitting a sole source.

This sole source acquisition is being conducted using the procedures of FAR Part 12 and FAR Subpart 13.5 in accordance with 41.U.S.C 1901 for a commercial item not exceeding $7.5 million. Acquisitions conducted under simplified acquisition procedures are exempt from the requirements in Part 6. In accordance with FAR 13.106-1(b) and FAR 13.501(a) contracting officers may conduct sole source acquisitions if the need to do so is justified in writing.

This sole source justification is prepared using the format at RFO 6.103-1 modified to reflect the procedures in FAR subpart 13.5 were used.

5. Proposed contractor's unique qualifications or nature of the acquisition requires use of the authority cited.

The COR has determined that only one source is reasonably available because UCSF has non-duplicable experience directly tied to this requirement. UCSF designed and fielded the 2022 and 2025 waves of the National Survey of US Digital Health Companies. To do so, UCSF developed the underlying survey instrument, analytic framework, variable construction, and longitudinal measures used for this effort. These efforts have been critical to ONC to assess digital health companies' experiences with APIs and interoperability.

Continuity with prior survey waves is critical to ensure methodological consistency, valid longitudinal comparisons, and accurate interpretation of trends over time. UCSF possesses institutional knowledge of survey design, variable construction, and analytic decisions that cannot be replicated without significant duplication of effort, increased cost, and risk to data integrity. UCSF's prior involvement includes knowledge of survey design decisions, item construction, variable derivation, data cleaning decision rules, and other analytic assumptions that cannot be fully captured in documentation and cannot be replicated without substantial reverse engineering.

In addition, UCSF has demonstrated a track record of producing peer reviewed and policy relevant outputs using these data, including publication in leading informatics journals, and has established expertise in analyzing national digital health and interoperability data aligned with ONC priorities. These capabilities and UCSF's direct role in developing and fielding the survey make it uniquely qualified to perform this work. Completing this work with another contractor would result in unacceptable risk to data integrity, analytic validity and continuity, and timely delivery of policy-relevant findings.

6. **Description of efforts made to ensure that offers are solicited from as many potential sources as is practicable, including whether a notice was or will be publicized as required by FAR subpart 5.2 and, if not, which exception under 5.202 applies.**

   Market research was conducted to identify potential sources capable of performing this requirement, including review of prior contractors, academic institutions, research organizations, and other contractors with demonstrated experience in health IT, interoperability, and digital health survey analysis. While multiple entities have general analytic capabilities, no other source was identified with the specific combination of experience required, including direct involvement in prior waves of this survey, knowledge of the survey instrument and data structure, and demonstrated ability to produce longitudinal analyses aligned with ONC policy priorities.

   Given the need to maintain methodological consistency and ensure valid longitudinal comparisons, soliciting additional sources would result in duplication of effort, increased resources and costs, and potential risks to data integrity and output inconsistencies.

7. **Determination by the Contracting Officer that the anticipated cost/price to the Government will be fair and reasonable.**

   The anticipated price was determined fair and reasonable based on a review of the proposed contractor's detailed cost breakdown, comparison to historical pricing for similar analytic and survey support efforts, and an assessment of the level of effort required to complete the tasks outlined in the statement of work. The Government has also evaluated the proposed price in relation to the technical approach, personnel qualifications, and deliverables to ensure alignment with the scope and complexity of the requirement.

8. **Description of the market research conducted (see FAR Part 10) and the results, or a statement of the reasons market research was not conducted.**

   Market research included a review of organizations with experience in health IT and digital health survey analysis, including academic institutions, research organizations, and contractors with prior experience supporting ONC and related federal efforts. Attention was given to entities with experience analyzing interoperability, API adoption, and EHR integration. This research confirmed that while multiple organizations have general analytic capabilities, UCSF is the only entity with direct experience designing, fielding, and analyzing this specific national survey across multiple waves. Their prior work, including development of the survey instrument and published analyses, positions them uniquely to ensure continuity, comparability, and methodological rigor. No alternative source was identified that could meet these requirements without substantial duplication of effort or risk to the validity of longitudinal findings.

9. **Any other facts supporting the justification.**

This requirement is directly tied to ONC's statutory and policy responsibilities to monitor and evaluate the implementation and impact of the 21st Century Cures Act and related health IT policies. The ability to produce valid longitudinal insights on digital health companies' experiences with interoperability and APIs is critical to informing federal policy, rulemaking, and stakeholder engagement.

This effort depends on maintaining consistency in measurement and analytic approach across survey waves. A new contractor would require redevelopment of analytic frameworks, re-interpretation of survey variables, and potential reprocessing of data, introducing a high risk of inconsistency in findings and reduced comparability over time.

This would also result in duplication of prior effort, increased costs, and delays in producing timely, policy-relevant outputs. Continued use of UCSF ensures continuity, preserves the integrity of longitudinal analyses, and enables efficient delivery of high-quality results aligned with ONC priorities. Disruption to this continuity would undermine the ability to produce reliable, comparable evidence to support ongoing policy decisions

10. **Listing of sources, if any, that expressed, in writing, an interest in the acquisition.**

No other sources have expressed interest in writing in response to this requirement at this time.

11. **Statement of the actions, if any, the agency may take to remove or overcome any barriers to competition before any subsequent acquisition for the required supplies or services.**

ONC will continue to document survey methodology, data structures, and analytic approaches developed under this effort. Where feasible, de-identified datasets, codebooks, and documentation will be prepared to support broader use and potential transition to other contractors in future acquisitions.

12. **Requiring Activity certification.**

This is to certify that the portions of this justification that 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 for other than full and open competition, are accurate and complete.

Official	Name & Title	Signature	Date
Requiring Activity POC	Wendy Kilgore, COR	WENDY L. KILGORE -S Digitally signed by WENDY L. KILGORE -S Date: 2026.05.20 15:24:00 -04'00'	5/1/2026

POC Immediate Supervisor	Wesley Barker, Branch Chief	PHILIP W. BARKER -S Digitally signed by PHILIP W. BARKER -S Date: 2026.05.20 15:09:23 -04'00'	5/1/2026
Head of the Sponsoring Program Office			

13. Contracting Officer certification and approval.

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.

Official	Name & Title	Signature	Date
Contracting Officer	Chris Poulos Contracting Officer	Christopher W. Poulos -S Digitally signed by Christopher W. Poulos -S Date: 2026.07.07 17:12:55 -04'00'	7/7/2026

14. Competition Advocate approval.

Official	Name & Title	Signature	Date
OPDIV Competition Advocate			