Justification for Other than Full and Open Competition
Sole Source Justification – Actionable Intelligence Technology (AIT), Comprehensive Financial Investigative Solution (CFIS)

(1) Identification of the agency and the contracting activity, and specific identification of the document as a "Justification for other than full and open competition."

Ordering Activity
Department of Veterans Affairs
Office of Inspector General, 51FA
810 Vermont Ave NW
Washington, DC 20420

Contracting Activity
Department of Veterans Affairs
Office of Inspector General, 53P
810 Vermont Ave NW
Washington, DC 20420

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

The Department of Veterans Affairs, Office of Inspector General (VA OIG) has a requirement for CFIS Software License Maintenance Renewal.

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

Deluxe Enterprise maintenance, support, upgrade assurance and library subscription. Annual license renewal for the CFIS Deluxe Enterprise, concurrent users, includes maintenance, support, upgrade assurance and IDA library subscription. Unlimited training and unlimited IDA templates. VA OIG, Forensic Accounting and Analysis Division (51FA) conducts numerous financial investigations of VA systems and programs. As part of those investigations, there is a requirement for software that processes and analyses financial data.

The estimated cost is $47,145.00

This action, over the full Base Period of Date of Award through 04/14/2027 is estimated to cost $47,145.00.

(4) An identification of the statutory authority permitting other than full and open competition.

RFO FAR 6.103-1(b) One responsible source.

(5) A demonstration that the proposed contractor's unique qualifications or the nature of the acquisition requires using the authority cited.

Automated data processing by CFIS offers advanced automation in processing extensive financial records, including bank statements, brokerage accounts, and credit card transactions. This capability significantly enhances the efficiency and accuracy of financial investigations. The software provides built-in tools for flow-of-funds analysis and links supporting documents directly to corresponding transactions, facilitating comprehensive tracking of financial activities. CFIS supports multiple languages and currencies, enabling VA OIG investigators to handle complex cases involving international financial transactions. AIT possesses unique expertise in financial investigative software solutions, ensuring that CFIS meets the specific and technical requirements necessary for complex financial investigations.

VA OIG, 51FA, uses CFIS daily to perform essential financial and non-financial analyses in support of investigations. CFIS possesses a unique mix of features that are not available in any other product, including the ability to extract and convert voluminous bank statements and other information quickly and accurately, which enables efficient performance of complex analyses. Further, CFIS utilizes two optical character recognition programs instead of one for better and faster conversion of paper or pdf documents and images into actionable, structured data with limited errors. CFIS also categorizes individual transactions in the conversion process instead of manual assignment once in Excel, which increases efficiency. Additionally, CFIS has a report generation function to capture specific information, automate the analysis of complex financial records, and link transactions to show flow of funds.

VA OIG has already invested in training personnel on CFIS and integrating it into existing investigative workflows. Procuring a different solution would necessitate additional expenditures on new software acquisition, training programs, and system integration efforts. Transitioning to an alternative product could lead to operational disruptions and delays in ongoing investigations, resulting in potential financial losses and compromised case outcomes. Introducing a new financial investigative tool would require time for personnel to adapt, during which the efficiency of investigations could decline.

VA OIG would suffer injuries without renewing CFIS. Given the current process and software infrastructure in use, failure to renew CFIS would create an immediate work stoppage. VA OIG personnel would have to acquire several alternative products, implement them, revise processes to fit the new software, and train personnel to use the new software and processes. These risks are avoidable and represent potentially significant waste. Renewing the CFIS software tool in its portfolio of systems allows 51FA to maintain its critical capability of providing VA OIG Special Agents and the Department of Justice with needed financial and other data analyses on a timely basis in myriad impactful investigations.

Delays in processing financial data due to the adoption of new software could lead to a backlog of cases, hindering the agency's ability to meet critical investigative deadlines.

(6) A description of efforts made to ensure that offers are solicited from as many potential sources as possible, including whether a notice was or will be publicized as required by part 5 and, if not, which exception under part 5 applies.

No additional offers will be solicited, as only Actionable Intelligence Technologies, Inc. is able to fulfill this requirement. This notice will be posted to SAM.gov as required.

(7) A determination by the contracting officer that the anticipated cost to the Government will be fair and reasonable.

The price is determined to be Fair and Reasonable. It is difficult to directly compare this product to any other product due to the unique nature of the software, but VA OIG is obtaining an identical rate (per license) to the previous year's rate, and identical to the rate of the year before that.

(8) The market research conducted (see part 10) and the results or a statement of the reason market research was not conducted.

Market research was conducted for services similar to CFIS. The results are provided on the market research document for further reference. CFIS is the best option for VA OIG.

(9) Any other facts supporting using other than full and open competition, such as:

N/A

(i) When 6.103-1 is cited for follow-on acquisitions as described in 6.103-1(c)(2), an estimate of the cost to the Government that would be duplicated and how the estimate was derived.

N/A

(ii) When 6.103-2 is cited, data, estimated cost, or other rationale as to whether and how much the Government would be harmed.

N/A

(10) A listing of the sources, if any, that expressed an interest in the acquisition in writing.

No other entities have provided a written interest in this action.

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

No additional actions will be taken at this time, as only Actionable Intelligence Technologies, Inc. is able to fulfill this requirement.

VA OIG will continue to perform Market Research to identify emerging possible sources to fulfill similar requirements in the future.

(12) Contracting officer certification that the justification is accurate and complete to the best of the contracting officer's knowledge and belief.

I certify that the facts are representations under my cognizance, which are included in this justification, are complete and accurate, and the particular brand name, product, or feature described above is essential to the VA OIG's requirements, and market research indicates other companies' similar products, or products lacking the particular feature, do not meet, or cannot be modified to meet, the agency's needs.

JANE MUIR Digitally signed by JANE MUIR
Date: 2026.07.09 11:06:52 -07'00'

Jane Muir Date

Director, VA OIG 51FA

I hereby certify that this justification is accurate and complete to the best of my knowledge and belief.

Brett Pickett 07/09/2026

Brett Pickett Date
Contracting Officer
VA OIG 53P