DEPARTMENT OF VETERANS AFFAIRS
BRAND NAME JUSTIFICATION UNDER SIMPLIFIED PROCEDURES FOR CERTAIN COMMERCIAL ITEMS IN ACCORDANCE WITH RFO 12.102
Acquisition

Plan Action ID: 36C249-26-AP-1831

1. **Contracting Activity:** Department of Veterans Affairs, VISN 09, TN Valley Medical Center-Nashville Campus, Network Office (NCO) 9
   2237: TBD- NRM Funding
2. **Nature and/or Description of the Action Being Processed:** The TN Valley Healthcare System (TVHS) Video Surveillance and Security System Project requires a single-source justification to limit integration of brand name Avigilon cameras. Avigilon is the brand name of the current installed camera equipment across the hospital campus and necessary to ensure smooth seamless integration of new equipment with already installed security system infrastructure.

3. **Description of Supplies/Services Required to Meet the Agency's Needs:** The Department of Veterans Affairs requires the use of Avigilon brand name security products, software, and associated system components to support the Tennessee Valley Healthcare System (TVHS) security modernization and video surveillance upgrade project. This construction requirement includes the installation, integration, configuration, and connection of new security infrastructure into the existing campus-wide security architecture to enhance overall physical security capabilities and ensure continued compliance with applicable VA security standards and operational requirements.

   The required Avigilon products and software, manufactured by Avigilon Corporation, an original equipment manufacturer operating under Motorola Solutions, are necessary to provide compatibility with the existing installed security environment currently utilized throughout the campus. The project requires advanced video surveillance functionality, including artificial intelligence-enabled video analytics, enhanced, monitoring and detection capabilities, centralized management functions, interoperability with existing security infrastructure, and improved incident response capabilities.

   The construction effort includes associated low-voltage wiring, infrastructure integration, equipment installation, system configuration, testing, and commissioning necessary to incorporate the upgraded system into the existing operational environment without disruption to ongoing medical center operations or degradation to existing security coverage. Use of the required Avigilon brand name products and software is necessary to ensure seamless integration with the current proprietary security systems, maintain interoperability between existing and newly installed components, preserve continuity of operations, and avoid unacceptable operational, technical, and cybersecurity risks associated with incompatible third-party systems.

   Additionally, the required products and software must be capable of integrating with the existing security monitoring framework and maintenance support structure currently utilized at the

facility to ensure system reliability, operational continuity, standardized maintenance support, and long-term sustainment of the security infrastructure across the campus

[redacted]

Estimated Period of Performance is: 270 calendar days after Notice to Proceed: July 15, 2026 – April 11, 2027

4. **Statutory Authority Permitting Restricted Competition:**

RFO 12.201 applying the Simplified Procedures for Commercial Items is 41 U.S.C. § 1901 for restricting competition on this procurement.

Competition is restricted on this procurement for the reason below:

(X) Only One Responsible Source and No Other Supplies or Services Will Satisfy Agency Requirements (**Brand Name**)

5. **Demonstration that the Contractor's Unique Qualifications or Nature of the Acquisition Requires the Use of the Authority Cited Above (applicability of authority):**

The modernization of the TVHS security monitoring system requires a surveillance platform that is fully compatible with the facility's existing Physical Access Control System (PACS), Intrusion Detection System (IDS), communication infrastructure, and VA-mandated cybersecurity and interoperability standards. Based on technical evaluations and system compatibility requirements, the Avigilon platform is the only known solution capable of meeting these essential operational and regulatory needs.

Avigilon provides seamless integration with the current security architecture, supports required communication interfaces, and aligns with VA Office of Information and Technology (OIT) cybersecurity, lifecycle management, and interoperability requirements. Transitioning to a different manufacturer would require extensive reengineering, replacement of existing infrastructure, redevelopment of integrations, and additional cybersecurity authorization activities, resulting in substantial duplication of cost that would not be recovered through competition and unacceptable delays in restoring and maintaining compliant security operations.

Market research confirmed that no alternative system meets the full interoperability, performance, and compliance requirements necessary for this project. Due to the proprietary nature of the Avigilon platform and its unique compatibility with existing systems, only authorized Avigilon vendors can provide the required supplies and services.

Accordingly, Avigilon is the only firm capable of providing the supplies and services described in Section III above without the Veterans Health Administration experiencing substantial duplication of cost that could not be expected to be recovered through competition and unacceptable delays in fulfilling its requirements.

6. **Description of Efforts Made to ensure that offers are solicited from as many potential sources as deemed practicable:**

Small Business Search (SBS) under Small Business Administration (SBA) Certification Search: Utilizing search parameters NAICS code 238210 provided (25) SDVOSB/VOSB results for potential vendors that met the search criteria.

Industry capability market research for Avigilon Brand Name prime vendor considerations was conducted 03/26/2026 with Reese Mitchell responding on 03/30/2026 as a person of contact in response to VA inquiries. Intended review response was anticipated 04/03/26, however a response was not received to inquiry.

System for Award Management (SAM) & (Federal Procurement Data System-FPDS now merged into SAM.gov) Search: Because this procurement primarily consists of electrical wiring and related tasks, the requirement is most appropriately classified under NAICS code 238210, which specifically covers the installation of electrical wiring and equipment for alarm systems.

Utilizing search parameters, NAICS 238210 and key words "Video Surveillance" provided (33) total contract actions with (2) SDVOSB contractors. However, only (3) total contract actions since 2025 and zero (0) identified SDVOSB contractors.

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Utilizing search parameters, NAICS 238210 and key word "Avigilon" provided (3) contracts awarded in 2019 and 2020 with only one contract valued at $1.6 million.

GSA Advantage Search: Utilizing search parameters under services the key words "Avigilon video surveillance" provided (11) total catalogs that met the search criteria. However, while there were various types of small business vendors, (1-WOSB, 2-VOSB, 5-SB), and 3-LB, there were no identified SDVOSB contractors.

A Sources Sought Notice (SSN) was posted to SAM.gov on 04/24/2026 and closed on 05/01/2026 with the following responses:

A total of ten (10) responses were received:
- 5 SDVOSB
- 2 VOSB
- 2 WOSB
- 2 Small Business (SB)
- 1 Large Business (LB)

(Several firms hold multiple socioeconomic statuses; therefore, counts reflect category identification, not a total of 12 respondents.)

Of these respondents, only two (2) SDVOSB, two (2) WOSB, and one (1) SB initially self-identified as authorized to provide the Avigilon brand-name products specified in the SSN. To ensure clarity

and accuracy, all ten respondents were then contacted and requested to confirm Avigilon brand authorization and indicate whether they were interested in the Nashville project, the Alvin C. York project, or both.

A total of six (6) firms provided follow-up confirmation consisting of either written authorization or clear self-certification. Among them:

- 2 SDVOSB
- 1 VOSB
- 2 WOSB
- 1 SB
- 1 LB

7. **Determination by the CO that the Anticipated Cost to the Government will be Fair and Reasonable:** An independent cost analysis was developed by a qualified architectural and engineering (A&E) firm to establish an objective Government estimate for the required work. This estimate will be used as a benchmark in evaluating all proposed pricing to ensure that submitted offers are aligned with expected market conditions and industry standards. This requirement solicited on SAM.gov as an open market, unrestricted competitive procurement, allowing multiple vendors to submit proposals.

   Competition is a primary means of ensuring fair and reasonable pricing. The CO will conduct appropriate price analysis techniques, including comparison of proposed prices to the independent cost estimate, evaluation of historical pricing (if applicable), and assessment of price realism. Certified cost or pricing data is not anticipated unless adequate price competition is not achieved as anticipated. Additionally, technical evaluations to assess the validity of proposed labor, materials, and associated construction elements may be requested. If necessary, further reviews such as audits or clarifications will be conducted to ensure that the final contract price is fair, reasonable, and in the best interest of the Government.

8. **Description of the Market Research Conducted and the Results, or a Statement of the Reasons Market Research Was Not Conducted:** Initial market research indicated that performance of this requirement by a small business prime contractor would necessitate subcontracting substantial portions of work across multiple specialized disciplines. The requirement is predominantly construction in nature and includes brand-name components specifically, Avigilon products and Johnson Controls system-service integration combined with significant multi-disciplinary coordination. These factors initially narrowed the pool of qualified small business prime contractors and reduced the likelihood that a small business could perform the full scope without extensive reliance on subcontractors. Such conditions create a heightened risk of noncompliance with SBA limitations on subcontracting and increase the potential for an impermissible pass-through arrangement, elevating the risk of regulatory violations, performance deficiencies, and substantial contract administration challenges.

Additionally, the brand-name Avigilon requirement limits participation to authorized vendors capable of integrating the system into the current VA infrastructure. Many small businesses identified during early market research lacked the required brand authorization and the technical integration expertise needed to provide a complete and compliant solution. To meet the technical and installation complexity of the project, these firms would need to rely on additional subcontractors, compounding concerns regarding excessive subcontracting and compliance with SBA requirements.

Initial market research identified small business entities capable of performing portions of the effort; however, none demonstrated capability to perform the full scope as a prime contractor. The combination of construction magnitude, brand-name specifications, and multi-disciplinary integration requirements further narrowed the pool of viable small business primes and significantly reduced the likelihood of meeting the requirement without triggering subcontracting and pass-through concerns. These conditions presented unacceptable performance, compliance, and administrative risks if the requirement were pursued solely as a small business set-aside.

Because the project requires coordinated execution across construction trades, electrical infrastructure, low-voltage cabling, and specialized security system installation, the work must be delivered as a unified, fully integrated effort. Structuring the procurement to enable small business participation through segmentation or heavy subcontracting would increase schedule and integration risks, raise the likelihood of interoperability issues, and impose additional administrative burden and cost to the Government.

Following initial market research and internal review, additional collaboration was conducted with key stakeholders, including the local and national SBA liaisons, NCO 9 Procurement Analysts, the Contracting Officer, Contract Specialist, Branch Chief, and Mission Partners.

Given the need for updated information specific to brand authorization, technical capability, and small business participation, the stakeholders collectively determined that issuance of a Sources Sought Notice (SSN) was necessary to finalize the appropriate acquisition strategy. The SSN was posted to SAM.gov on 04/24/2026, with responses due by 05/01/2026.

Based on these updated responses, the additional market research results confirmed that two or more SDVOSB firms can meet the requirement, which included the brand name Avigilon component and the associated construction related effort. This satisfies the criteria under VA Rule of Two, establishing a reasonable expectation of receiving offers from at least two capable SDVOSB firms at fair and reasonable prices.

In accordance with RFO 19.106 2(b) and consistent with the results of the updated market research, it is recommended that this requirement be procured as a 100% SDVOSB set aside and solicited as an open market Request for Proposal (RFP) on SAM.gov under RFO 12.201-1(c)(1) procedures.

9. <u>Any Other Facts Supporting the Use of Other than Full and Open Competition</u>: None

10. **Listing of Sources that Expressed, in Writing, an Interest in the Acquisition:** Non-Applicable

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**: The Department of Veterans Affairs (VA) recognizes the importance of promoting full and open competition to the maximum extent practicable. Although this acquisition is being executed as SDVOSB set-aside with brand name limitations due to the proprietary nature of Avigilon Software, and Johnson Controls Inc, the VA will take proactive measures to reduce barriers and expand competition for future requirements.

    To achieve this, the agency will undertake the following actions:

    a. Engage with the OEM:
       The VA will continue to communicate with Avigilon and Johnson Control Inc. to determine whether additional partners can be trained, certified, and authorized to provide OSCR services. This will encourage a broader competitive base for future procurements.

    b. Monitor Market Developments:
       The Contracting Officer will continue to monitor market conditions and coordinate with the OEM to determine if additional authorized resellers become available in the future, to promote competition in subsequent procurements when practicable. Through conducting market research to identify new vendors, technology updates, or third-party maintenance providers that may obtain OEM certification or equivalent authorization.

12. **Requirements Certification:** I certify that the requirement outlined in this justification is a Bona Fide Need 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.

[redacted]_ _____
Date

Chief of Facilities Management
TVHS Healthcare Medical Center
(TVHS-Nashville)

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

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

[redacted] __ _____

Date

Contracting Officer
Network Contracting Office (NCO) 9

b. **One Level Above the Contracting Officer (Required over $350K but not exceeding $900K):** I certify the justification meets requirements for other than full and open competition.

[redacted] _____

Date

NCO 9 Branch Chief
Network Contracting Office (NCO) 9