DEPARTMENT OF VETERANS AFFAIRS

SOLE SOURCE JUSTIFICATION UNDER SIMPLIFIED PROCEDURES FOR CERTAIN COMMERCIAL ITEMS IN ACCORDANCE WITH FAR 13.5

Acquisition Plan Action ID: 36C262-26-AP-6957

1. **Contracting Activity:** Department of Veterans Affairs, VISN 22, Loma Linda VA Medical Center PR-IFCAP# 605-26-3-077-0457.

2. **Nature and/or Description of the Action Being Processed:** This procurement is for the acquisition and implementation of a sole source, proprietary PriMega/PIPX paging system upgrade for the Loma Linda VA Medical Center's existing Prism Code Blue notification infrastructure. The award will be executed as a new firm-fixed-price. This action is necessary to restore and ensure reliable operation of life-safety, business-critical code blue notifications following the progressive failure of the current system. The action will not be issued as a modification to an existing contract. The total estimated value of the acquisition is $512,737.00.

3. **Description of Supplies/Services Required to Meet the Agency's Needs:** The required supplies/services consist of all proprietary compatible software, hardware (including PriMega message gateway, base station controllers, VHF transmitters), advanced code blue dispatcher interface upgrades, configuration, installation, and support necessary to transition the legacy Prism Code Blue system to the PriMega/PIPX architecture (latest version, e.g., v11). This platform is essential for regulatory compliance with VHA Directive 1177 (Cardiopulmonary Resuscitation) and NFPA 101 Life Safety Code.

4. **Statutory Authority Permitting Restricted Competition:**
FAR 13.5 Simplified Procedures for Certain Commercial Items. The statutory authority for applying the Simplified Procedures for Commercial Items of FAR 13.5 is 41 U.S.C. § 1901 and is implemented by FAR 13.106-1(b)(2) 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
   ( ) Unusual and Compelling Urgency
   ( ) Industrial Mobilization, Engineering, Developmental or Research Capability or Expert Services
   ( ) International Agreement
   ( ) Authorized or Required by Statute
   ( ) National Security
   ( ) Public Interest

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 Prism Code Blue infrastructure at Loma Linda VA Medical Center is a proprietary, integrated communications and paging system manufactured, licensed, and solely supported by Prism-IPX Systems, LLC. The system relies on proprietary software, protocols, and hardware architecture exclusively available through

Prism-IPX. Only the original equipment manufacturer can deliver the required upgrade to the PriMega/PIPX platform, ensuring continued compliance with VA and life safety regulations and direct compatibility with existing system components.

No other supplier can provide the necessary software/hardware due to proprietary controls, intellectual property rights, and unique integration requirements. Attempting to replace or bypass the system would result in excessive downtime, unacceptable risk to patient safety, loss of compliance, and duplication of costs that cannot be recovered. RCAs have documented that system failures have already delayed Code Blue activations, endangering Veteran patient lives. Immediate replacement/upgrade by the proprietary source is essential to prevent further life safety risks.

Accordingly, Prism-IPX Systems LLC is the only firm capable of providing the supplies and services described in Section III above without the Veteran's 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:** Limited efforts were made due to the fact that the requirement has been deemed to be available only from the original source as continuation of the services is necessary as described in Section 5 above.
Notice of intent to sole source was posted on 6/17/2026 to 7/9/2026 on SAM.gov in which no responses were received.

7. **Determination by the CO that the Anticipated Cost to the Government will be Fair and Reasonable:** The Contracting Officer will conduct a fair and reasonable price determination by:
Comparing the vendor's proposal to historical prices paid by VA and other agencies for similar upgrades.
Reviewing the vendor's submitted pricing for consistency with commercial price lists for similar proprietary systems.
Analyzing labor, equipment, and support costs, and, if necessary, performing a technical evaluation or audit.

8. **Description of the Market Research Conducted and the Results, or a Statement of the Reasons Market Research Was Not Conducted:** Market research was conducted in accordance with FAR Part 10, VAAR Part 810, and PPM 2016-05. The VA Rule of Two was applied via a search of the Vendor Information Pages (VIP) database for SDVOSBs/VOSBs in the relevant NAICS code. No SDVOSB/VOSB vendors were found who have the legal ability or proprietary access to perform the required upgrade for the Prism system. Open-source and commercial market research further confirmed that no alternative suppliers, resellers, or integrators can supply proprietary PriMega/PIPX upgrades or components. As described in Section 6, no alternate sources can meet requirements.

9. **Any Other Facts Supporting the Use of Other than Full and Open Competition:**
Additional facts supporting this sole source procurement include the following:
Integration/Compatibility Requirements: The Prism Code Blue system is an actively used, mission-critical, life-safety platform. The system's proprietary software, hardware interfaces, and communication protocols (TAP, TNPP, SMTP, WCTPS, SIP) do not allow for integration with

substitute components, third-party upgrades, or generic replacements without risking total system failure or significant downtime. Any attempt at hybridization or non-OEM intervention will void existing warranties, support, and certifications, jeopardizing compliance with NFPA 101 and VHA Directive 1177.

Adverse Patient Safety Impact: Multiple documented Root Cause Analyses (RCAs) show that current system degradation and failures have already resulted in delayed Code Blue activations, directly impacting patient outcomes and representing a clear and ongoing risk to life safety. Continuing with the current partially failed infrastructure creates unacceptable risk, and time is of the essence.

Timeliness and Continuity of Operations: Transitioning to an entirely new system from another vendor would require extensive planning, acquisition, and implementation timelines (potentially 12–24 months), leading to prolonged periods of suboptimal or inoperable emergency communications. Only the proprietary upgrade path allows for a rapid restoration of compliant, fully functional code blue alerting without prolonged outages.

Duplication of Cost: Replacement with a non-proprietary or third-party solution would require significant re-investment in entirely new infrastructure (hardware, software, training, installation, and certifications), resulting in substantial duplication of cost that would far exceed the cost of the targeted upgrade and cannot be recouped through competition.

Brand Name Only Requirement: The urgent need for restoration, assurance of performance, and regulatory compliance necessitate a brand name only procurement of the Prism-IPX upgrade. There is no alternate product or "equal" solution that satisfies the VA's operational, technical, or regulatory requirements for this critical life-safety application.

No Suitable Specifications for Open Competition: Due to the proprietary design, development of specifications or a statement of work suitable for open competition is not feasible or available. Only Prism-IPX is authorized and technically able to provide the necessary components and support without risking functionality, safety, and compliance.

For all these reasons, limiting consideration to the proprietary supplier, Prism-IPX Systems, LLC, is essential for continuity of operations, patient safety, regulatory compliance, and to prevent unnecessary duplication of cost and risk.

10. **Listing of Sources that Expressed, in Writing, an Interest in the Acquisition:** There are no other sources that have expressed interest.

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 VA will continue to review emerging technologies and consult with industry experts during regular system lifecycle assessments. Upon system end-of-life, the agency will conduct an open competition for potential replacement with non-proprietary or open-architecture code blue platforms, provided they meet VA/NFPA regulatory requirements and operational needs. For the current procurement, no actions can be taken to afford competition due to the proprietary nature of the upgrade and risk to patient care.

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]

Chief Biomedical Engineer

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Date

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]

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Date

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]

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Date

c. **VHA Advocate for Competition and RPO HCA Review and Approval:** I have reviewed the foregoing justification and find it to be complete and accurate to the best of my knowledge and belief and approve $900K to $90 million for other than full and open competition.

_____
Name
VHA Head of Contracting Activity (HCA)

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Date