

JUSTIFICATION FOR AN EXCEPTION TO FAIR OPPORTUNITY

1. Contracting Activity: Department of Veterans Affairs (VA)
Office of Procurement Operations
Technology Acquisition Center
23 Christopher Way
Eatontown, NJ 07724
2. Description of Action: The proposed action is for a firm-fixed-price delivery order to be issued under the National Aeronautics and Space Administration (NASA) Solutions for Enterprise-Wide Procurement (SEWP) V Governmentwide Acquisition Contract (GWAC) for brand name Cockroach Database (CRDB) Subscription Licenses and Maintenance.
3. Description of the Supplies or Services: VA, Office of Information and Technology (OIT), Product Delivery Services (PDS), Data, Artificial Intelligence, and Innovation Services (DAIS) Portfolio has a requirement for brand name CRDB Subscription Licenses and Maintenance, inclusive of software updates, fixes, security alerts, patches, and 24/7 customer support, herein referred to as software support. VA's existing Summit Data Platform (SDP) requires CRDB, a cloud-native database supporting multi-cloud and hybrid deployments across diverse environments. The SDP requires a database solution that ensures high elasticity and consistency to support mission-critical workloads. This solution must adhere to ACID (Atomicity, Consistency, Isolation, Durability) principles, ensuring reliable data transactions across multiple environments. The database must support distributed Structured Query Language (SQL), enabling deployment across various physical nodes and cloud regions, offering flexibility in scaling operations. The solution must also include non-intrusive, near real-time Change Data Capture (CDC) capabilities, enabling seamless data updates to the SDP. The solution must support multi-cloud hybrid deployments, allowing integration across Data Centers, On-Premise, VA Enterprise Cloud (VAEC), GovCloud, and Microsoft Azure Government (MAG) environments. Geo-partitioning is required to optimize latency and ensure consistent and responsive performance for VA operations nationwide. The solution must also provide resilience and elastic scaling to handle machines, datacenter, and regional failures, maintaining continuous operation without manual intervention. Together, these capabilities enable VA to accurately capture operational data and deliver near real-time insight and analytics, ensuring decision makers and customer service staff have accurate, current information to better serve Veterans.

The Contractor shall provide up to 300 hours of incidental services support per 12-month period, applicable to the base period and each option period. This support covers technical assistance beyond standard software maintenance, including configuration and troubleshooting.

The period of performance consists of a 12-month base period and two 12-month option periods. The total estimated value of this action, inclusive of options, is [REDACTED].

4. Statutory Authority: The statutory authority permitting an exception to fair opportunity is Section 41 U.S.C.4106(c)(2) as implemented by Revolutionary Federal Acquisition

Regulation Overhaul (RFO) VA Deviation 16.507-6(b)(2) entitled, "Only one awardee is capable of providing the supplies or services required at the level of quality required because the supplies or services ordered are unique or highly specialized."

5. Rationale Supporting Use of Authority Cited Above: Based on market research described in Section 8 of this justification, it has been determined that only brand name CRDB subscription licenses and maintenance, inclusive of support meet VA's requirements. CRDB meets VA's requirements for a transactional database compatible with the SDP's containerized architecture. CRDB can interoperate with the SDP, a key technology enabler that provides interoperability across VA systems. Only Cockroach Labs or an authorized reseller can provide software maintenance, functionality and security patches, and support services for CRDB. Without an active support and maintenance agreement, VA risks operational disruptions caused by unpatched software vulnerabilities, potential exposure of Veteran data, SDP downtime, data integrity failures, and loss of near real-time analytics capability. Without CRDB support, VA would lose the ability to maintain accurate, current, and replicable data across its cloud platforms, directly degrading customer service operations and decision-making capabilities that ultimately affect Veterans.

CRDB satisfies all key requirements for the SDP, to include delivering the elasticity and consistency required for VA's mission-critical workloads and adhering to ACID principles to ensure reliable data transactions. The database supports distributed SQL and deploys across multiple physical nodes within a single data center or across cloud regions, providing the flexibility needed to scale VA operations. CRDB also provides near real-time CDC, seamlessly integrating data updates into the SDP and ensuring VA's data remains current and accessible without disrupting ongoing operations. Additionally, CRDB's multi-cloud hybrid deployment capabilities enable VA to implement the database across Data Centers, On-Premise, VAEC, GovCloud, and MAG environments, supporting VA's diverse infrastructure requirements.

CRDB's geo-partitioning capability optimizes latency and ensures consistent, responsive performance across all VA locations, providing Veterans with a uniform experience regardless of where they receive care. CRDB is also designed for resilience and elastic scaling, handling failures at the machine, datacenter, and regional levels, scaling horizontally with minimal latency and without manual intervention to ensure continuous service for VA operations. No other known commercial database solution offers the same combination of distributed SQL, ACID compliance, near real-time CDC, and multi-cloud hybrid deployment capabilities required to support the SDP without a complete redesign of the platform's data infrastructure. Replicating CRDB's current functionality using an alternative solution would require rebuilding the SDP's database layer from the ground up, as no other solution offers the same pre-engineered integration with VA's existing containerized architecture. If the additional licenses are not acquired, SDP will not be able to support a modernization effort being executed by VA OIT's Lighthouse team. Lighthouse provides secure Application Programming Interface (API) connectivity for health data consumers; the team is moving (modernizing) an on-premises data source to SDP, using CRDB. Without additional licenses the Lighthouse team will not be able to

satisfy high-volume API requests. Implementing an alternative solution is estimated to take approximately 18 months at a cost of approximately [REDACTED], accounting for platform redesign, additional engineering resources, integration testing, validation activities, and operational downtime. These estimates are based on previous acquisition history. These costs would not be recovered through competition.

6. Efforts to Obtain Competition: Market research was conducted, details of which are in Section 8 of this justification. This effort did not yield any additional sources that can meet the Government's requirements. However, the undersigned VA technical representative determined that limited competition is available among authorized resellers for the brand name CRDB Subscription Licenses and Maintenance. In accordance with RFO VA Deviation 16.507-6(f)(1)(i), this justification will be provided with the solicitation to all appropriate NASA SEWP V GWAC holders.

7. Actions to Increase Competition: The Government will continue to conduct market research to ascertain if there are changes in the marketplace that would enable future actions to be competed.

8. Market Research: VA's technical experts conducted market research from May 2026 through July 2026, using web-based research and the NASA SEWP V GWAC Provider Lookup Tool to evaluate alternative database solutions. The alternatives reviewed included PostgreSQL, Google Cloud Spanner, and Amazon Aurora, each of which was found lacking in critical functionality necessary for VA's operations. Specifically, none of these solutions could provide the resilience and elastic scaling required to handle failures at the machine, datacenter, and regional levels — a capability essential to maintaining continuous VA operations. Additionally, none offered the geo-partitioning capability needed to optimize latency and ensure consistent, responsive performance across all VA locations. Further evaluation confirmed that, due to the proprietary nature of CRDB, no other company can provide the critical updates, security patches, and technical support required for VA's operational needs.

The Contract Specialist conducted further market research using the NASA SEWP V Market Research and Provider Lookup Tools, identifying thirteen contract holders as resellers of brand name CRDB by manufacturer name, Cockroach Labs. Of these thirteen resellers, four are verified Service-Disabled Veteran-Owned Small Businesses (SDVOSBs), three are Woman-Owned Small Businesses (WOSBs), three are Historically Underutilized Business Zone (HUBZone) Small Businesses, two are Small Businesses (SBs), and one is Other than Small. The Contract Specialist verified the four SDVOSB contractors in the Small Business Administration (SBA) certification database (<https://search.certifications.sba.gov/>) and confirmed that three of the four hold active SDVOSB certifications.

This requirement has been found to be within scope of NASA SEWP V GWAC. Based on the market research documented above, the Government has a reasonable expectation that competition exists on the NASA SEWP V GWAC among two or more SDVOSBs for brand name CRDB Subscription Licenses and Maintenance, inclusive of support.

9. Other Facts: None.

10. Technical and Requirements Certification: I certify that the supporting data under my cognizance, which are included in this justification, are accurate and complete to the best of my knowledge and belief.

[REDACTED]

[REDACTED]

Signature:

[REDACTED]

11. Fair and Reasonable Cost Determination: I hereby determine that the anticipated price to the Government for this contract action will be fair and reasonable based on the expectation of price competition in addition to the fact that prices on the NASA SEWP V GWAC have already been determined to be fair and reasonable. Additional price analysis will be conducted by comparing the proposed prices to the Independent Government Cost Estimate as well as comparing against the NASA SEWP V established Catalogue CLIN Pricing.

[REDACTED]

[REDACTED]

Signature:

[REDACTED]

12. Procuring Contracting Officer Certification: I certify that this justification is accurate and complete to the best of my knowledge and belief.

[REDACTED]

[REDACTED]

Signature:

[REDACTED]

Advocate for Competition Approval

In my role as procuring activity Advocate for Competition, based on the foregoing justification, I hereby approve the acquisition of brand name CRDB Subscription Licenses and Maintenance on an other than fair opportunity basis pursuant to the authority cited in Section 4 above, subject to availability of funds, and provided that the property and services herein described have otherwise been authorized for acquisition.



8/27/26

Date

Advocate for Competition
Technology Acquisition Center
Department of Veterans Affairs