



**VA ELECTRONIC HEALTH RECORD MODERNIZATION
(EHRM) SYSTEM
PERFORMANCE WORK STATEMENT (PWS)
DEPARTMENT OF VETERANS AFFAIRS**

Office of Electronic Health Record Modernization (OEHRM)

Revenue Cycle Development for IOC

Date: July 18, 2019

TAC- <19-56383>

Task Order PWS Version Number: 1.0

Revenue Cycle Development for IOC

TAC Number: <TAC-19-56383>

Contents

1.0	BACKGROUND.....	3
2.0	APPLICABLE DOCUMENTS.....	3
3.0	SCOPE OF WORK.....	3
3.1	APPLICABILITY.....	4
3.2	ORDER TYPE.....	4
4.0	PERFORMANCE DETAILS.....	4
4.1	PERFORMANCE PERIOD.....	4
4.2	PLACE OF PERFORMANCE.....	4
4.3	TRAVEL OR SPECIAL REQUIREMENTS.....	4
4.4	CONTRACT MANAGEMENT.....	4
4.5	GOVERNMENT FURNISHED PROPERTY.....	4
4.6	SECURITY AND PRIVACY.....	4
4.6.1	POSITION/TASK RISK DESIGNATION LEVEL(S).....	5
5.0	SPECIFIC TASKS AND DELIVERABLES.....	5
5.1	PROJECT MANAGEMENT.....	5
5.1.1	CONTRACTOR PROJECT MANAGEMENT PLAN.....	5
5.1.2	REPORTING REQUIREMENTS.....	6
5.1.3	TECHNICAL KICKOFF MEETING.....	6
5.2	VA-SPECIFIC REVENUE CYCLE DEVELOPMENT.....	6
5.3	DEVELOPMENT OF TRAINING AND CHANGE MANAGEMENT CONTENT.....	10
5.4	TESTING AND USER ACCEPTANCE.....	10
5.5	ADDITIONAL TECHNICAL SUPPORT (OPTIONAL TASK).....	10
6.0	GENERAL REQUIREMENTS.....	11
6.1	PERFORMANCE METRICS.....	11
6.2	SECTION 508 –INFORMATION AND COMMUNICATION TECHNOLOGY (ICT) STANDARDS.....	12
6.2.1	REPRESENTATION OF CONFORMANCE.....	12
6.2.2	ACCEPTANCE AND ACCEPTANCE TESTING.....	13
6.3	DELIVERABLES.....	13

Revenue Cycle Development for IOC

TAC Number: <TAC-19-56383>

1.0 BACKGROUND

The mission of the Department of Veterans Affairs (VA) is to provide benefits and services to Veterans of the United States. In meeting these goals, VA strives to provide high quality, effective, and efficient Information Technology (IT) services to those responsible for providing care to the Veterans at the point-of-care as well as throughout all the points of the Veterans' health care in an effective, timely and compassionate manner. VA depends on Information Management/Information Technology (IM/IT) systems to meet mission goals.

On May 17, 2018, VA entered into a ten-year indefinite-delivery, indefinite-quantity (ID/IQ) sole-source contract with Cerner Government Services, Inc. (Cerner) to acquire the Electronic Health Record (EHR) system being deployed by the Department of Defense (DoD) and related services for deployment and transition across the VA enterprise in a manner that meets VA needs, and which will enable seamless healthcare to Veterans and qualified beneficiaries. Procurement of a single common system across VA and DoD shall achieve VA's goal of seamless care for Veterans by facilitating the transition of active duty military members to VA and improving their timely access to the highest quality of care.

Cerner's EHR solution shall provide VA with a single system that can store and retrieve administrative, clinical, laboratory, radiology, pharmacy and scheduling data, and can interact with other internal and external systems. Modernization of VA's EHR will support a Veteran-centric, team-based care model, with modern decision support tools; clinical information content services; identification, communication and standardization of care paths; and resource provisioning. This will improve interoperability, performance, and user experience for the majority of the health care delivery and ancillary teams responsible for directly or indirectly providing health care services; and in turn will improve quality, safety, and timeliness of health care services delivered to Veterans.

Cerner shall provide a comprehensive EHR solution and services as specifically defined in the EHRM Basic contract. This task order requires software development, configuration, testing and deployment in support of revenue cycle for IOC.

2.0 APPLICABLE DOCUMENTS

There are no Applicable Documents in addition to the documents in Paragraph 3.0 in the EHRM Basic Performance Work Statement (PWS).

3.0 SCOPE OF WORK

The Contractor shall develop, test and deploy additional revenue cycle functionality in support of VA revenue cycle requirements for IOC. The Contractor shall support:

- Project management
- VA-specific revenue cycle development
- Development of training and change management content

Revenue Cycle Development for IOC

TAC Number: <TAC-19-56383>

- Testing and user acceptance
- Additional technical support

3.1 APPLICABILITY

This Task Order (TO) effort PWS is within the scope of paragraph 5.5, “VA Enterprise EHRM Baseline Preparation,” of the EHRM Basic PWS.

3.2 ORDER TYPE

The effort shall be proposed on a Firm Fixed Price (FFP) basis.

4.0 PERFORMANCE DETAILS

4.1 PERFORMANCE PERIOD

The period of performance (PoP) shall be 12 months from date of award with one optional task.

4.2 PLACE OF PERFORMANCE

Efforts under this TO shall be performed at Contractor facilities. The Contractor shall identify the Contractor’s place of performance in their Task Execution Plan submission.

4.3 TRAVEL OR SPECIAL REQUIREMENTS

The Government anticipates travel to perform the tasks associated with the effort, as well as to attend program-related meetings or conferences throughout the PoP. Include all estimated travel costs in your firm-fixed price line items. These costs will not be directly reimbursed by the Government.

4.4 CONTRACT MANAGEMENT

All requirements of Section 9.0 of the EHRM Basic PWS apply to this effort. This TO shall be addressed in the Contractor’s Monthly Progress Report as set forth in the EHRM Basic contract.

4.5 GOVERNMENT FURNISHED PROPERTY

Not applicable.

4.6 SECURITY AND PRIVACY

All requirements in Section 7.0 of the EHRM Basic PWS apply to this effort.

Revenue Cycle Development for IOC

TAC Number: <TAC-19-56383>

It has been determined that protected health information may be disclosed or accessed and a signed Business Associate Agreement (BAA) shall be required. The Contractor shall adhere to the requirements of the BAA executed between OEHRM and Cerner Corporation; and shall comply with VA Directive 6066 and VHA Handbook 1605.05.

4.6.1 POSITION/TASK RISK DESIGNATION LEVEL(S)

The position sensitivity and the level of background investigation commensurate with the required level of access for all PWS tasks is Tier3/Non-Critical Sensitive in accordance with Section 8.7 of the EHRM Basic PWS.

The Tier3/ Non-Critical Sensitive Position Sensitivity and Background Investigation requirements identify, in effect, the Background Investigation requirements for Contractor individuals, based upon the tasks the particular Contractor individual will be working. The submitted Contractor Staff Roster must indicate the required Background Investigation Level for each Contractor individual based upon the tasks the Contractor individual will be working, in accordance with their submitted proposal.

5.0 SPECIFIC TASKS AND DELIVERABLES

The Contractor shall perform the following:

5.1 PROJECT MANAGEMENT

The Contractor shall provide a single Point of Contact for management of all project tasks, with individual subject matter experts assigned to each individual task. The Contractor shall include a Communications Plan in the Contractor Project Management Plan (CPMP) to cover overall and individual point of contact (POC) communications as well as issue escalation procedures.

5.1.1 CONTRACTOR PROJECT MANAGEMENT PLAN

The Contractor shall deliver a Contractor Project Management Plan (CPMP) that lays out the Contractor's approach, timeline and tools to be used in execution of this TO effort. The CPMP should take the form of both a narrative and graphic format that displays the schedule, milestones, risks and resource support. The CPMP shall also include how the Contractor shall coordinate and execute planned, routine, and ad hoc data collection reporting requests as identified within the PWS. The initial baseline CPMP shall be concurred upon and updated in accordance with Section B of the TO. The Contractor shall update and maintain the VA Program Manager (PM) approved CPMP throughout the PoP.

Deliverable:

Revenue Cycle Development for IOC

TAC Number: <TAC-19-56383>

A. Contractor Project Management Plan

5.1.2 REPORTING REQUIREMENTS

The Contractor shall provide a Monthly Progress Report in accordance with Section 9.6.1.1 of the EHRM Basic PWS. For each major work element described in this TO, Cerner will provide/update applicable architectures/documentation as part of the VIP Technical Documentation required by PWS paragraph 5.2. These updates may include requirements, architecture (updates to existing OV-1, SvcV-1, SV-1), development views, data models, data flow diagram, and decision package for EHRM governance approval.

Deliverable:

A. Monthly Progress Report

5.1.3 TECHNICAL KICKOFF MEETING

The Contractor shall hold a technical kickoff meeting within 10 days after TO award. The Contractor shall present, for review and approval by the Government, the details of the intended approach, work plan, and project schedule for each effort. The Contractor shall specify dates, locations (can be virtual), agenda (shall be provided to all attendees at least five calendar days prior to the meeting), and meeting minutes (shall be provided to all attendees within three calendar days after the meeting). The Contractor shall invite the Contracting Officer (CO), Contract Specialist (CS), COR, and the VA PM.

5.1.4 IOC GO-LIVE COORDINATION

The Contractor shall coordinate scheduling and go-live activities with the EHRM IOC deployment team to ensure all stakeholders are informed of risks, timelines, and go-live tasks required. The Contractor shall provide monthly status updates to the deployment team focused on IOC deployment go-live activities to ensure effective communication between the relevant TO teams. These status updates shall be documented in the Monthly Progress Report.

5.2 VA-SPECIFIC REVENUE CYCLE DEVELOPMENT

The Contractor shall develop, test and deploy VA-specific revenue cycle functionality as required for IOC. The Contractor shall provide technical documentation. The Contractor shall provide revenue cycle development teams to develop and test revenue cycle functionality required for IOC. The technical skill sets comprising each development team shall evolve to match the requirements of the tasks. Each team shall work on the revenue cycle product development backlog as prioritized by the VA and Cerner revenue cycle team. Items in the product backlog may be added, deleted or reprioritized to reflect evolving revenue cycle requirements. Additional development

Revenue Cycle Development for IOC

TAC Number: [<TAC-19-56383>](#)

teams required to accommodate revenue cycle product backlog requirements can be acquired through exercise of the optional task in PWS task 5.5.

The Contractor shall design, develop, test and deploy custom code to address revenue cycle requirements for IOC as illustrated in the current product backlog by functional areas below. Appendix A - VBA Requirements Traceability Matrix and Appendix B – Community Care Requirements Traceability Matrix include additional key requirements for IOC for which development is anticipated to be added to the product backlog.

Table 1 - Patient Access Custom Coding Language Development Product Backlog

Description	Long Description	Solution/ Area	Type of Request	IOC
Lifetime Pharmacy Eligibility (LPE)/DEERS checking	Evaluate person level data with encounter level data to determine if there are any modifications	Registration	Program	Increment 1
Coverage Discovery CCL Job that generates a file transferred to HDX	IP does not have a complete solution. Consulting has concerns around the ability to identify the appropriate population to enable a retrieve. Commercially you can trigger the retrieve off the patient self-pay plan information. For Federal, the primary profiles used will include Federal plan information (not self-pay). Regardless of the federal benefit plan a user still may have private insurance (OHI). Need extract to HDX/Experian used to qualify patients for coverage discovery	Registration	Extracts	Increment 1
Lifetime Pharmacy Encounter (LPE) Creation	When person is added to Millennium, automate creation of LPE; need to align the single pharmacy profile with the LPE	Registration	Program	Increment 1
Custom Scripting for Cleaning UP Past Due Encounters	Custom Cleanup/program of encounters	Registration	Program	Increment 1

Table 2 - Medical Management Custom Coding Language Development Product Backlog

Description	Long Description	Solution/ Area	Type of Request	IOC
3M 360 Professional Encoder Integration	Need process for 3M Profsee encoder to send charge updates. Additionally, need mechanism to create waiting for coding hold on Profsee encounters and allow for an inbound update from 3M to apply action code to resolve work item/billing hold	HIM	Program	Increment 1

Revenue Cycle Development for IOC

TAC Number: <TAC-19-56383>

Table 3 - Patient Accounting Custom Coding Language Development Product Backlog

Description	Long Description	Solution/ Area	Type of Request	IOC
USVA_DC Medicare Deductible Alert	Need mechanism (work item API) to allow for a work item to be created whenever a VA patient with Medicare went to an outside facility. Medicare sends a file (MDA) to Vista today to inform Vista that these patients need to be reviewed to have their payments reviewed for refund	CPA	Program	Increment 1
Interest & Admin Fee	Need CCL programs to calculate interest and admin fees to 1st party balances for VA. Need posting logic to post to admin and interest first, followed by principle using FIFO logic. Additional requirement to ensure that Vista and Cerner aren't both charging patient admin fee since only one can exist at a time	CPA	Program	Increment 1
FMS/General Ledger Extracts	Need CCL extracts to send to the Financial Management System to support General Ledger for VA	CPA	Report	Increment 1
Pharmacy Accept, Deny, Reject Claims Status	Need a way to bring in additional pharmacy claim statuses (faux claims?) or reportable answer for reporting on all statuses in addition to the accepted claims that IP has committed to.	CPA	Tool	Increment 1
Dental Claims	Need potential CDI's to incorporate missing 837d values into 837P	CPA	CDI's	Increment 1
837 inbounds and process community care billing and payments	Ability to accept 837's from CC providers, read the charges on the 837 and create a VA encounter to recreate that claim in EHRM	CPA	Tool	Increment 1
First Party Statement Cycle Mapping w/ GPO (Gov't Printing Office). Scanline or acceptance of Cerner Statement ID for Lockbox Payments.	Need scanline to include statement number or need ability for lockbox to accept payments at MRN level	CPA	Extracts	Increment 1

Revenue Cycle Development for IOC

TAC Number: [<TAC-19-56383>](#)

Description	Long Description	Solution/ Area	Type of Request	IOC
Charge transfers across encounters	Requesting automation to copy charges from a DoD encounter to a VA encounter (or vice versa) to accomplish 3rd party OHI rebill. The service would only be applicable when both VA and DOD facilities engaged are on Millennium.	CPA	Program	Increment 1
Dental claims for Pre-Determination	Need ability to send predetermination dental claims which are essentially an 837D with a modified header segment, but we don't want to create charges in order to create these claim	CPA	Program	Increment 1
Paper Remittance – Pharmacy	IP is enabling the faux Rx claim to be actionable with will allow the use to manually post a remittance against the claim (if not electronically sent). Consulting has reservations that the tool will be inefficient. CCL request would allow the end user to confirm remittances by payor at a much larger and more efficient scale.	CPA	Program	Increment 1
Huron Workflow Tool	Huron workflow tool is not in scope for interfacing/extracts and has been messaged as expected to be replaced by Revenue Cycle work queues. The tool incorporates non-Millennium data from ~10 other source systems for both work queues and over 200 reports, and replacement would warrant thousands more hours of development time and effort than integration from Millennium. The tool has a precedent for use with AHSW in conjunction with Millennium Revenue Cycle and has for 7+ years.	CPA	Extracts	Increment 1
Assessment CMS NPI	CMS Extract of NPIs	Financial Reporting	Report	Increment 1
VERA	Extract to VERA - Veteran's Equitable Resource Allocation	Financial Reporting	Extracts	Increment 1
Cost Accounting (MCA)	Extract to MCA - Managerial Cost Accounting – Workload	Financial Reporting	Extracts	Increment 1
Line of Business sub- grouping for Revenue reporting	Need the ability to report on Sub Line of Business	Financial Reporting	Report	Increment 1
Dental G/L and A/R routed into Millennium	Need ability to report on Dental transactions in Millennium	Financial Reporting	Report	Increment 1

Revenue Cycle Development for IOC

TAC Number: <TAC-19-56383>

The Contractor shall provide a Demonstration of Functionality as completed to obtain VA user acceptance.

5.3 DEVELOPMENT OF TRAINING AND CHANGE MANAGEMENT CONTENT

The Contractor shall tailor revenue cycle training and change management content to reflect updated functionality.

5.4 TESTING AND USER ACCEPTANCE

The Contractor shall:

- a. Develop a Revenue Cycle Test Plan and approach tailored to the scope of this TO. The Revenue Cycle Test Plan shall be integrated into the overall Contractor Master Test Plan with input and concurrence from the VA EHRM Test Lead.
- b. Develop Testing Artifacts such as test scenarios, test cases, test data, and test results to execute and report on data migration testing activities. The Contractor Test Report of Findings/Test Analysis Report shall serve as the key test artifact for the formal deliverable process. Other test artifacts such as test cases, test results, etc. shall be entered and maintained in tools as outlined in Contractor Master Test Plan and OEHRM Test Evaluation Master Plan as the work is being executed. The Contractor shall coordinate with VA Test & Evaluation team to define methodology to test the integrity of each development item.
- c. Provide support for execution of VA Test & Evaluation acceptance, data integrity, and validation testing including defect/issue process, assistance in troubleshooting/triaging, jointly troubleshooting issues, and responding to findings from test activities.
- d. Conduct system performance monitoring to ensure scalability, reliability and availability of the system.
- e. Test and validate production environment with Revenue Cycle code deployed.
- f. Develop the Revenue Cycle Deployment Guide Including back-out and rollback procedures.
- g. Provide rev cycle updates to the Master Test Plan including:
 - a. Contractor Test Report of Findings/Test Analysis Report
 - b. Testing Artifacts (such as test scenarios, test cases, test data, and test results)

5.5 ADDITIONAL TECHNICAL SUPPORT (OPTIONAL TASK)

Revenue cycle business requirements continue to evolve to meet VA priorities and may require completion of additional projects throughout the PoP of this Task Order. VA may exercise this optional task for additional revenue cycle technical support. This optional task may be exercised multiple times during the base period up to the established CLIN

Revenue Cycle Development for IOC

TAC Number: <TAC-19-56383>

ceiling, which will consist of negotiated labor categories and hours established at the Task Order level. Optional tasks executed through the below process will exercise labor categories and hours from the established ceiling.

VA may exercise the optional task upon written notification from the Contracting Officer. This optional task may be utilized to obtain additional support as described in PWS sections 5.2 through 5.4. VA will provide a description of the required functionality. The Contractor shall provide VA with a written proposal detailing the approach and resources utilizing the negotiated ID/IQ labor categories and rates. VA will perform an analysis to determine if the technical approach and price proposed are reasonable. The price for each optional task shall be negotiated on a FFP basis prior to each exercise of the optional task.

6.0 GENERAL REQUIREMENTS

6.1 PERFORMANCE METRICS

The table below defines the Performance Standards and Acceptable Levels of Performance associated with this effort. The Government may also utilize the commercially available and VA-specific Key Performance Indicators (KPIs) and Service Level Agreements (SLAs) defined at the ID/IQ level to measure performance under this TO, as applicable.

Performance Objective	Performance Standard	Acceptable Levels of Performance
A. Technical / Quality of Product or Service	<ol style="list-style-type: none"> 1. Shows understanding of requirements 2. Efficient and effective in meeting requirements 3. Meets technical needs and mission requirements 4. Provides quality services/products 5. Meets performance thresholds/metrics defined in applicable Service Level Agreements 	Satisfactory or higher
B. Project Milestones and Schedule	<ol style="list-style-type: none"> 1. Quick response capability 2. Products completed, reviewed, delivered in accordance with the established schedule 	Satisfactory or higher

Revenue Cycle Development for IOC

TAC Number: <TAC-19-56383>

Performance Objective	Performance Standard	Acceptable Levels of Performance
	3. Notifies customer in advance of potential problems	
C. Staffing	1. Currency of expertise and staffing levels appropriate 2. Personnel possess necessary knowledge, skills and abilities to perform tasks	Satisfactory or higher
D. Invoicing	1. Invoices are current, accurate, and complete.	Satisfactory or higher
E. Management	1. Integration and coordination of all activities to execute effort	Satisfactory or higher

The COR will utilize a QASP throughout the life of the TO to ensure that the Contractor is performing the services required by this PWS in an acceptable level of performance. The Government reserves the right to alter or change the QASP at its own discretion. A Performance Based Service Assessment will be used by the COR in accordance with the QASP to assess Contractor performance.

6.2 SECTION 508 –INFORMATION AND COMMUNICATION TECHNOLOGY (ICT) STANDARDS

All requirements in Sections 8.10, including subparagraphs, of the EHRM Basic PWS apply to this effort. Deliverable requirements are further defined in the following subparagraphs. The Contractor shall comply with the technical standards at: <https://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-ict-refresh/final-rule/single-file-version>

6.2.1 REPRESENTATION OF CONFORMANCE

The Contractor shall provide a Section 508 Subject Matter Expert lead for VA EHRM 508 resources to work with. The Contractor shall adhere to the VA-approved Section 508 Test and Delivery Plan and Section 508 Accessibility Roadmap delivered under TO 0001. The Contractor shall update the Government Product Accessibility Template (GPAT) and/or Voluntary Product Accessibility Template (VPAT) delivered under TO 0001 to indicate the level of Section 508 conformance as updates are made to its products and/or services to ensure and sustain 508 compliance.

The Contractor shall work closely with VA Section 508 representatives to verify Section 508 conformance of its products and/or services.

Revenue Cycle Development for IOC

TAC Number: <TAC-19-56383>

6.2.2 ACCEPTANCE AND ACCEPTANCE TESTING

The Contractor shall provide Final Section 508 Compliance Test Results. The Section 508 Test Results shall include a GPAT/VPAT Conformance Statement validating conformance to Section 508 Refresh Success Criteria and Conformance Requirements for already-developed ICT deliverables.

The Final Section 508 Test Results shall be reviewed and approved by VA Section 508 representatives to validate conformance to Section 508 Refresh Success Criteria and Conformance Requirements for ICT deliverables.

For software development for VA interfaces/systems, the Contractor shall prepare and submit a Section 508 Conformance Validation Package with content as outlined in VA Process Asset Library, Software Development Product Build process map.

The Section 508 Conformance Validation Package shall be reviewed and approved by VA Section 508 representatives to validate conformance to Section 508 Refresh Success Criteria and Conformance Requirements for ICT deliverables.

Automated test tools, manual techniques, and checklists are used in the VA Section 508 compliance assessment.

Deliverable:

- A. Final Section 508 Compliance Test Results for ICT Deliverables
- B. Section 508 Compliance Validation Package for ICT Deliverables

6.3 DELIVERABLES

The Contractor shall provide deliverables for Government review and acceptance IAW with Section B.2 of the Task Order. The Contractor shall incorporate Government feedback provided via the OEHRM Deliverables review process into Task Order deliverables as applicable. Feedback shall be incorporated in either the resubmission or next required submission of the deliverable based upon the timeframe in which it is provided by the Government. For Government feedback requiring additional discussion and/or clarification, the Contractor shall coordinate language updates with VA to resolve and finalize revisions to the affected deliverable. The Contractor shall appropriately mark and date deliverables to maintain version control using the following format: TO Number – CLIN Number Formal Deliverable Title – Deliverable Due Date IAW Section B.2– Version X.X. The Contractor shall annotate major (initial submission) and minor (resubmission) deliverable releases using a numerical system (e.g. Initial submission: TO 0001 – 0001AA Contractor Project Management Plan - August 2018 – Version 1.0; Resubmission: TO 0001 – 0001AA Contractor Project Management Plan – August 2018 – Version 1.1). Resubmitted deliverables shall maintain the original due date defined in Section B.2 of the TO. The Contractor shall provide discrete deliverables in separate

Revenue Cycle Development for IOC

TAC Number: <[TAC-19-56383](#)>

email submissions. Email submissions shall include the Contract/Task Order numbers and corresponding deliverable CLIN number. The Contractor shall track updates in both major and minor deliverable releases in an agreed upon format, such that the Government can identify and review language revisions for acceptance.

Revenue Cycle Development for IOC

TAC Number: <TAC-19-56383>

CONTRACTOR EMPLOYEE PERSONAL FINANCIAL INTEREST/PROTECTION OF SENSITIVE INFORMATION AGREEMENT

This Agreement refers to Contract/Order _____ entered into between the Department of Veterans Affairs and _____ (Contractor).

As an employee of the aforementioned Contractor, I understand that in connection with my involvement in the support of the above-referenced Contract/Order, I may receive or have access to certain "sensitive information" relating to said Contract/Order, and/or may be called upon to perform services which could have a potential impact on the financial interests of other companies, businesses or corporate entities. I hereby agree that I will not discuss or otherwise disclose (except as may be legally or contractually required) any such "sensitive information" maintained by the Department of Veterans Affairs or by others on behalf of the Department of Veterans Affairs, to any person, including personnel in my own organization, not authorized to receive such information.

"Sensitive information" includes:

- (a) Information provided to the Contractor or the Government that would be competitively useful on current or future related procurements; or
- (b) Is considered source selection information or bid and proposal information as defined in FAR 2.101, and FAR 3.104-4; or
- (c) Contains (1) information about a Contractor's pricing, rates, costs, schedule, or contract performance; or (2) the Government's analysis of that information; or
- (d) Program information relating to current or estimated budgets, schedules or other financial information relating to the program office; or
- (e) Is properly marked as source selection information or any similar markings.

Should "sensitive information" be provided to me under this Contract/Order, I agree not to discuss or disclose such information with/to any individual not authorized to receive such information. If there is any uncertainty as to whether the disclosed information comprises "sensitive information", I will request my employer to request a determination in writing from the Department of Veterans Affairs Contracting Officer as to the need to protect this information from disclosure.

I will promptly notify my employer if, during my participation in the subject Contract/Order, I am assigned any duties that could affect the interests of a company, business or corporate entity in which either I, my spouse or minor children, or any member of my immediate family/household has a personal financial interest. "Financial

