

**DEPARTMENT OF VETERANS AFFAIRS**

**Justification and Approval  
For  
Other Than Full and Open Competition**

**1. Contracting Activity:**

Department of Veterans Affairs, Network Contracting Office (NCO20), for Puget Sound Health Care System (VAPSHSC), 1660 S Columbian Way, Seattle, Washington 98108-1587.

**2. Nature and/or Description of the Action Being Processed:**

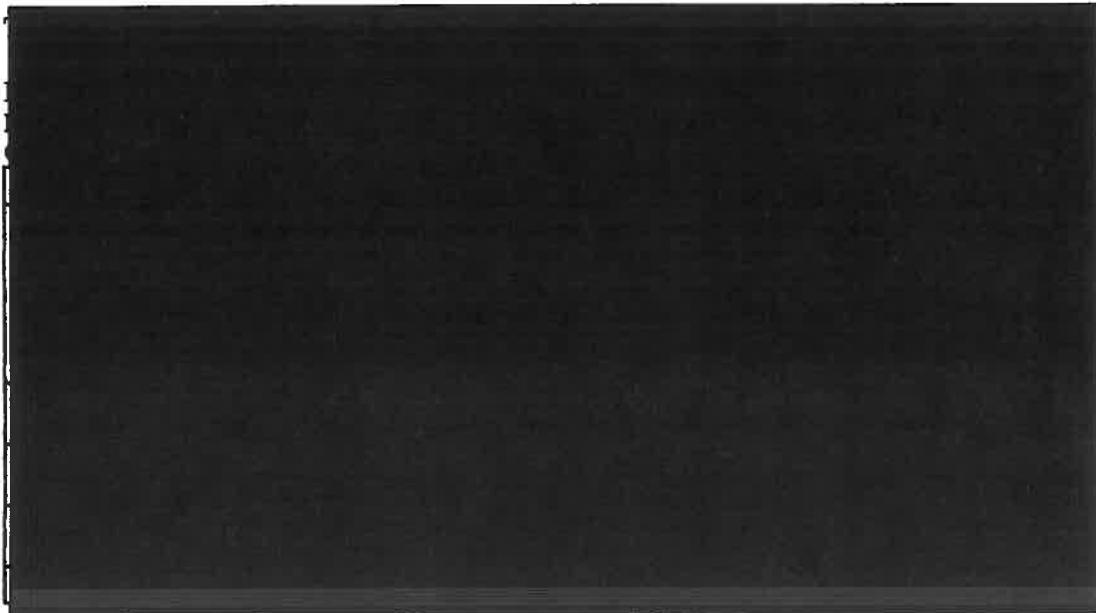
This is a Firm-Fixed Price new procurement under PR #663-14-1-4141-0065 for the research project, entitled VETPALS. This project was "grandfathered" by a previous (FY2007 – FY 2009) contract executed by Spectrum Research (663-D-767063/663-D-76089), which began researching the physical and psychosocial effects of Veteran amputees. This ongoing research will be funded by the Rehabilitation Research and Development Grant, application number 1101RX001143-01A1.

**3. Description of Supplies or Services Required to Meet the Agency's Needs:**

Spectrum Research, 705 S. 9<sup>th</sup> Street, Ste. 203, Tacoma, WA, 98405 will provide services to the VAPSHCS Rehabilitation Research and Development Center of Excellence for Limb Loss Prevention and Prosthetic Engineering.

**Phase 1:** The purpose of Spectrum Research Inc. is to provide development, daily data query, and data management of the Electronic Data Capture (EDC) system, randomization web site, and screening and enrollment website for the VETPALS clinical study for a period of approximately 48 months. This includes daily oversight and interaction with study coordinators to ensure a smooth flow of subject recruitment, data entry, and data quality and integrity.

**Phase 2:** This study is a two-arm randomized controlled trial (RCT) to determine the efficacy of a group-based self-management intervention for Veterans with limb loss (VETPALS). The following aims will be assessed: (1) determine the impact of VETPALS upon physical and psychosocial functioning; (2) determine the impact of VETPALS upon self-efficacy, patient activation, problem solving, quality of life, and positive affect; (3) evaluate the implementation of the VETPALS intervention into the VA health care system.



The period of performance is May 1, 2014 – April 30, 2018.

**4. Statutory Authority Permitting Other than Full and Open Competition:**

**Statutory Authority: 41 U.S.C. 253(c), or 38 U.S.C. 8153 as implemented by FAR 6.302.**

- (1) Only One Responsible Source and No Other Supplies or Services Will Satisfy Agency Requirements per FAR 6.302-1;
- (2) Unusual and Compelling Urgency per FAR 6.302-2;
- (3) Industrial Mobilization, Engineering, Developmental or Research Capability or Expert Services per FAR 6.302-3;
- (4) International Agreement per FAR 6.302-4
- (5) Authorized or Required by Statute FAR 6.302-5;
- (6) National Security per FAR 6.302-6;
- (7) Public Interest per FAR 6.302-7;

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

Spectrum Research is the only vendor with the requisite unique knowledge, specific to this patient population and the operations of this trial, to design a website for data collection and a randomization scheme. Spectrum also has a unique understanding of the questionnaires used to measure VETPALS success, thus, it is critical that this vendor reviews the data entered on these measures to ensure data quality and integrity.

Dr. Dan Norvell (VP of Spectrum Research) is both a former military physical therapist and doctoral-level trained clinical epidemiologist with extensive experience in the assessment of bio-psychosocial risk factors for poor outcome following limb loss and the functional assessment of outcomes following limb loss.

He has worked extensively on the VETPALS team for an on-going program of research examining risk factors for functional outcome (AMPREDICT I), validation risk factors for functional outcome (AMPREDICT II), and now brief interventions improving functional outcome following limb loss (VETPALS). His consistent support of the team in the following capacities that will continue into this project:

- 1) Methodological consultation on study design;
- 2) Selection of outcome measures;
- 3) Process of measuring outcomes;
- 4) Consultation on data analysis and on the production of scientific manuscripts.

In addition, he and the team at Spectrum will work to produce an Electronic Data Management process that includes:

- 1) All the elements listed on the original application;
- 2) Ongoing troubleshooting of data quality
- 3) Consultation on study process and flow based upon incoming data that provides meaningful feedback about:
  - a. Recruitment, retention, quality of data from our participants.

Finally, it is important to apply data obtained from this proposed research project within the parameters already created by the grant-funded program. This will avoid duplicate Government funding allocation toward services provided by another external vendor.

**6. Description of Efforts Made to Ensure that Offers are Solicited from As Many Potential Sources as Deemed Practicable IAW FAR 13.104:**

In accordance with FAR 5.202, this requirement is not required to be publicized as it was accepted as an unsolicited research proposal under the Department of Veterans Affairs, Research and Development approved grant "Self-Management to Improve Function Following Amputation." However, 3 vendors were approached to determine interest regarding Phase 1 of the project (Electronic Data Capture system development) which was initially considered a severable service.

The SOW was subsequently expanded to include Phase 2 of the study, as the Project Officer and the Contracting Officer determined that the integrity of the grant-funded study required follow-on capabilities of the current vendor conducting the research.

**7. Determination by the Contracting Officer that the Anticipated Cost to the Government will be Fair and Reasonable – IAW FAR 13.106-3:**

Vendor hourly wages for the specific job titles listed within the grant application were researched via the Department of Labor website, OnSite.com, and indeed.com. Prices were verified as, albeit some above average, comparable to the salaries of those in industry in the Seattle, WA area.

The price is in accordance with the established price schedule agreed upon between the contractor and the Government grants application number 1101RX001143-01A1.

**8. Description of the Market Research Conducted and the Results, or Statement of Reasons Market Research was not Conducted (FAR 10):**

As discussed in Paragraph 6, market research, via telephone and email inquiry, was conducted based on an initial SOW covering the scope of work in Phase 1 (development of the Electronic Data Capture system), only. Two parties, Battelle Institute and Research Triangle Institute, expressed written interest, but the scope of the project was subsequently expanded.

**9. Any Other Facts Supporting the Restriction of Competition:**

Utilizing an organization other than Spectrum Research could cause faulty analysis and corrupt the integrity of the study.

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

Battelle Institute, Research Triangle Institute International (RTI), and Applied Research Associates were initially contacted regarding Phase 1 of the acquisition, only. Battelle Institute and RTI International expressed interest in writing. However, after further deliberation with the Project Officer, Contracting Officer and the Grant Program Coordinator, it was determined that the inclusion of Phase 2 would be a more appropriate acquisition, given the need to maintain the services and study integrity that Spectrum Research already provides under this grant-funded research project.

**11. Statement of 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:**

None.

**12. Requirements Certification:**

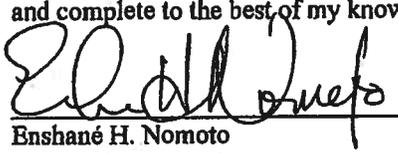
I certify that the requirement outlined in this justification is a Bona Fide Need of the Department of Veterans Affairs and that the supporting data under my cognizance, which are included in the justification, are accurate and complete to the best of my knowledge and belief.

  
Name: Wesley Edmundson  
Administrative Officer

4/4/2014  
Date

**13. Approvals in accordance with FAR 6.304**

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

  
Enshané H. Nomoto  
Contracting Specialist  
Network Contracting Office 20 (NCO20)

4/4/2014  
Date

- b. **NCO Director:** I certify the justification meets requirements for other than full and open competition.

  
Digitally signed by  
nicholas.jenkins@va.gov  
DN: cn=nicholas.jenkins@va.gov  
Date: 2014.04.16 15:57:21 -07'00'  
Nicholas M. Jenkins  
Director of Contracting  
Network Contracting Office 20 (NCO 20)

4/16/2014  
Date