

DEPARTMENT OF VETERANS AFFAIRS

Limited-Sources Justification

Procurement Policy Services

1. Contracting Activity:

This is a Limited Source Justification. The requiring activity is the Department of Veterans Affairs (VA), Office of Acquisition and Logistics, Procurement Policy and Warrant Management Service (PPS) and the contracting activity is VA's Denver Acquisition and Logistics Center (DALC). PPS's responsibilities are critical to VA's acquisitions efforts and include developing and issuing VA procurement policy and other notices for distribution to contracting professionals, updating VA Acquisition Regulations (VAAR), and the development of a VA Acquisition Manual (VAAM).

2. Nature and/or description of the action:

This limited sources justification is for a four month (labor-hour) interim task order, with a two month option period, to the current incumbent, Markon, Inc. (Markon) (GSA contract GS-00F-0012Y). Markon's existing task order is scheduled to end on April 25, 2014 and the proposed interim task order would provide for services through October 31, 2014. This four month interim task order, with two month option, will allow VA PPS and the DALC to finalize requirements for a follow-on task order and has an estimated value of \$1,343,412.40.

3. Description of supplies/services required to meet the Agency's needs:

PPS has a requirement for contractor support services to assist in research, development and sustainment/updates to procurement policy. The contractor researches and assesses procurement policy, supports ongoing policy standardization efforts throughout the VA, revises and drafts procurement policy and procedural documents for Government review. These services support critical VA procurement policy functions.

4. Authority and supporting rationale:

FAR 8.405-6(a)(1)(i)(A). An urgent and compelling need exists, and following the procedures would result in unacceptable delays.

5. Demonstration that the Contractor's unique qualifications or nature of the acquisition requires the use of the authority cited above:

The current contractor, Markon Inc., has provided the required services beginning 01 November 2013. Since the start of performance, Markon has provided the required policy

support services and established a project plan to complete scheduled updates to various Veterans Affairs Acquisition Regulations (VAAR) parts as well as development efforts for VA Acquisition Manual parts.

Throughout performance, Markon has accomplished the following efforts: revised a total of twenty (20) VAAR parts, six (6) VAAR parts that have been determined actionable and have begun the formal rulemaking process as well as development of the six (6) corresponding VAAM parts consisting of procedures, guidance and instruction. The current milestone schedule reflects the contractor completing the revision and development of three (3) additional VAAR/VAAM parts by the end of April 2014. The contractor continues to work with PPS to frame policy issues and identify other potential cases that will be developed during this contract extension period. The extension period will allow a reasonable path to finish work in progress and to transition existing projects to the new contractor. If the contract is not extended, the PPS mission will suffer unacceptable delays to their overall mission to revise the VA Acquisition Regulation and develop a VA Acquisition Manual as mandated by the Secretary of VA's major program initiatives.

6. Description of efforts made to ensure that offers are solicited from as many potential sources as deemed practicable:

Due to the nature of this action, it is only feasible to solicit offers from the incumbent. The DALC and PPS began the process to issue a follow-on solicitation, but this process will not be completed prior to April 25, 2014.

7. Determination by the Contracting Officer that the order represents the best value:

This order represents the best value considering price and the unacceptable delays that would result in a gap in service. Historical price data will be used to ensure this action will result in a price that is considered fair and reasonable. Labor rates from Markon's FSS contract will be compared to pricing received for this extension in order to make a fair and reasonable price determination.

8. Description of the market research conducted and the results:

The DALC issued an RFI on March 7, 2014 to determine potential sources for the follow-on procurement. No other market research was conducted.

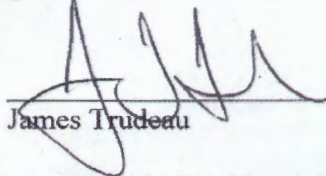
9. Any other facts justifying a limited source task order:

PPS does not currently have the government staff to fill the roles that the current contractor performs. The government staff only accounts for four employees of the fourteen total staff supporting the VAAR/VAAM workload. Any new contractor would need a transition period with the incumbent. This six month extension will allow sufficient time for a competitive action and a reasonable amount of time for a transition period.

10. 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 progress made to transition this contract from a labor-hour contract to a fixed-price contract will streamline the acquisition of these services in the future.

11. 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.


James Trudeau

4/9/14

Date

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


David F. Little
Contracting Officer

4/9/2014

Date