

**DEPARTMENT OF VETERANS AFFAIRS**  
**Justification and Approval**  
**For**  
**Other Than Full and Open Competition**

1. **Contracting Activity:** Department of Veterans Affairs, NCO 16 Division I Services Team. This is the justification for the Other Full and Open Competition for Valet Parking Services at the Michael E. DeBakey VAMC (MEDVAMC) in Houston, TX. 2237 Request No - 580-14-3-4090-0048. The duration of this requirement would be 6 mths (7/1/2014 – 12/31/2014) for an estimated amount of \$324,000.
2. **Nature and/or Description of the Action Being Processed:**  
The MEDVAMC has a requirement for providing Valet Parking services to its Veterans. This requirement will run from 7/1/2014 – 12/31/2014, and does not include any options. This requirement is to be procured from a SDVOSB. The estimated value of this 6 month service is \$324,000 (\$54,000 per month X 6 months). This will be a firm fixed price for a monthly rate to provide Valet Parking services in accordance with the SOW.
3. **Description of Supplies/Services Required to Meet the Agency's Needs:**  
This requirement is for Valet Parking services for Veterans at the MEDVAMC. The estimated value is \$325,000 for this requirement to park an estimated 1,300 vehicles per day for the 6 month period of performance from 7/1/2014 – 12/31/2014.
4. **Statutory Authority Permitting Other than Full and Open Competition:**  
☐ (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)**  
It is recommended that a sole source Service Disabled Veteran Owned Small Business (SDVOSB) award be made to SLF Parking Services Corp, Spring, TX 77389-2601. In accordance with FAR 6.302 "Circumstances Permitting Other than Full and Open Competition" the following statutory authority is cited as justification to award a sole source Veteran Owned Small Business contract valued more than \$150,000 (simplified acquisition threshold) and less than \$5,000,000 (authority ceiling limit)

Far 6-302-5 "Authorized or Required by Statute"

Authority.

Citations: 10 U.S.C 2034(c)(5)

Full and Open Competition need not be provided for when –

A statute expressly authorizes

Statute: P.L 109-461 Sec. 502 as codified in 38 U.S.C. § 8127(c)

Sole Source Contracts for Contracts Above Simplified Acquisition Threshold- For purposes of meeting the goals under subsection (a), and in accordance with this

section, a contracting officer of the Department may award a contract to a small business concern owned and controlled by veterans using procedures other than competitive procedures if--

such concern is determined to be a responsible source with respect to performance of such contract opportunity;

the anticipated award price of the contract (including options) will exceed the simplified acquisition threshold (as defined in section 4 of the Office of Federal Procurement Policy Act (41 U.S.C. 403)) but will not exceed \$5,000,000; and in the estimation of the contracting officer, the contract award can be made at a fair and reasonable price that offers best value to the United States.

**6. Description of Efforts Made to ensure that offers are solicited from as many potential sources as deemed practicable:**

This 6 month contract will be sole sourced to SLF Parking Services. No other SDVOSBs were considered for this temporary contract. SLF Parking is currently providing these services for the MEDVAMC facility.

**7. Determination by the Contracting Officer that the Anticipated Cost to the Government will be Fair and Reasonable:**

The current price of \$54,000 per month for an estimated 1,200 cars per day has an estimated cost of \$45 per car parked. In response to an email sent out to all ECMS Users I received the following information on other Valet Parking contracts from around the VA:

VA Location	Contract#	Estimated # of cars parked per day	monthly \$	\$ per car parked
Muskogee, OK	VA256-12-C-0274	75	14,016.84	186.89
Biloxi, LA	VA256-14-C-0272	130	20,450.00	157.31
Sioux Falls, SD	VA263-13-C-0230	85	19,450.00	228.82
Columbia, SC	VA247-14-C-0283	150	11,250.00	75.00
San Francisco, CA	VA261-14-P-1612	650	26,700.00	41.08
Palo Alto, CA	VA261-14-C-0220	200	45,000.00	225.00
Columbus, OH	VA250-12-C-0084	200	17000.00	85.00
			Average Cost	142.73

As shown above the estimated pricing for the Houston service of \$45 is below the above shown average cost (\$) per car parked. Even if the pricing increases slightly, it will still be well below the average price paid by other VA's for Valet Parking services.

**8. Description of the Market Research Conducted and the Results, or a Statement of the Reasons Market Research Was Not Conducted:**

In accordance with the Veterans First Public Law 109-461 the procurement may be sole sourced to a SDVOB company. This is a temporary contract to be put in place to allow for advertisement of a base and 4 option year long-term contract that will be competitively solicited.

**9. Any Other Facts Supporting the Use of Other than Full and Open Competition:**

This is a temporary contract to be put in place to allow for advertisement of a base and 4 option year long-term contract that will be competitively solicited.



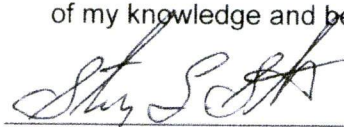
10. **Listing of Sources that Expressed, in Writing, an Interest in the Acquisition:**

This is being sole sourced in accordance with Veterans First Public Law 109-461.

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:**

This is a temporary contract to be put in place to allow for advertisement of a base and 4 option year long-term contract that will be competitively solicited.

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.

  
Stanley Staton  
Chief of Police  
MEDVAMC

6/12/14  
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.

jared.cariker@va.gov

Digitally signed by jared.cariker@va.gov

DN: cn=jared.cariker@va.gov

Date: 2014.06.12 15:20:40 -05'00'

Jared L. Cariker  
Contracting Officer  
NCO 16 Division I Services

Date

- b. **P&C:** I certify that the foregoing justification is accurate and complete to the best of my knowledge and belief.

judy.chambers  
2@va.gov

Digitally signed by judy.chambers2@va.gov  
DN: cn=judy.chambers2@va.gov  
Date: 2014.06.12 15:37:58 -05'00'

Jeff Farley  
CHIEF, Division I Services Team  
Network Contracting Office 16

Date

- c. **NCM/PCM (Required \$3K and above):** I certify the justification meets requirements for other than full and open competition.

  
Aaron Villalpando  
Director of Contracting  
Network Contracting Office 16

6/17/2014  
Date

## Market Research Report - Contracting

1. Purchase Request #: 580-14-3-4090-0048
2. Title: Valet Parking Services
3. Product or Service Code (NAICS): 812930
4. Estimated Contract Value (including options): \$ 324,000.00
5. In accordance with Federal Acquisition Regulation (FAR) Part 10, market research has been conducted for this acquisition. The following techniques were used (**check all that apply and provide a narrative of the nature of the information obtained and the contact information identified for each reference checked below**):

- ☒ Historical acquisition information (review of recent market research results for similar or identical supplies/services).
- ☒ Personal knowledge/experience in procuring supplies/services of this type.
- ☒ Contact with the requester and/or other knowledgeable people in Government and industry regarding the commercial nature of this requirement and standard industry practices in this area of supply/service.
- ☐ Publication of a formal request for information through the Government-wide point of entry.
- ☐ Publication in appropriate technical journals.
- ☒ Review of Government and/or commercial databases for relevant information:
  - Sources Checked: ☐ GSA Advantage ☐ VetBiz Registry ☐ SBA Dynamic Small Business Search ☒ Other
- ☐ Review of Internet resources.
- ☐ Use of source lists for identical or similar items obtained from Government, professional, and/or industry sources.
- ☐ Review of catalogs and other generally available product literature (online and/or in hard copy).
- ☐ Interchange meetings or presolicitation conferences with potential offerors.

Comments/Narrative (**response required**): This is being sole sourced in accordance with Veterans First Public Law 109-461. SLF Parking Services Corp is currently providing these services for the Michael E. DeBakey VAMC.

6. On the basis of the results of the above research, it is determined that this requirement:

☒ *Can* be met by commercial items, commercial items with customary or minor modifications, or nondevelopmental items.

OR

☐ *Cannot* be met by commercial items, commercial items with modifications, or nondevelopmental items. Further, a reevaluation has been made in accordance with FAR 10.002(b), and the Government requirement cannot be modified in a way that will allow a commercial item to meet the need. *Note:* Any presolicitation synopsis of this requirement must include Numbered Note 26.



## Market Research Report - Contracting

Summarize the reasons for this determination: This service is available and used by private business.

(Example: Market research may reveal that a combination of commercial/noncommercial items can meet the Government's needs.)

7. On the basis of the results of the above research, it is determined that this requirement:

☒ *Can* ☐ *Cannot* be set-aside for Service Disabled Veteran Owned Small Business or Veteran Owned Small Business because **(response required)**: This is being sole sourced in accordance with Veterans First Public Law 109-461.

8. Based on the following, it has been determined by the CO that this requirement: ☐ *Can*

☒ *Cannot* be set-aside for Small Business because **(response required)**: This is being sole sourced in accordance with Veterans First Public Law 109-461.

(Example: A review of the SBA Dynamic Small Business search shows no small businesses available (explain); please include specific information related to results of 8(a) / WOSB / HUBZone / etc.:)

9. Pricing factors (e.g., pricing history, competitive conditions, overall level of demand, trends in supply and demand, pattern of demand, other impacting market forces, pricing strategies, sources of supplies) **(response required)**: There are no pricing factors that would impact this requirement.

10. Standard industry terms and conditions (e.g., warranty, maintenance, discounts, liability, delivery, acceptance/rejection) under which commercial sales of the required supplies/services are made (respond as applicable): None, all insurance requirements will be included in the solicitation.

11. Laws or regulations unique to the required supplies/services (respond as applicable): None, the Commercial clauses are sufficient for this requirement.

12. On the basis of the above information, the basic clauses and provisions prescribed in FAR Part 12:

☒ are sufficient for use in this acquisition and do not require any substantial tailoring to be consistent with industry's commercial practices.

OR

☐ require tailoring to be consistent with industry's commercial practices. All such tailoring will be included in the solicitation issued for the required supplies/services.

13. Based on the above market research, it is determined to be in the best interest of the Government to **(response required)** (Identify here a summary of the acquisition strategy being used): This is being sole sourced in accordance with Veterans First Public Law 109-461. This is a temporary

## Market Research Report - Contracting

contract to be put in place to allow for advertisement of a base and 4 option year long-term contract that will be competitively solicited.

Signed: \_\_\_\_\_ (Service / End User)

Date: \_\_\_\_\_

Signed: jared.cariker@ Digitally signed by  
jared.cariker@va.gov (Contracting Officer)

Date: va.gov DN: cn=jared.cariker@va.gov  
Date: 2014.06.12 14:17:52 -05'00'