

**DEPARTMENT OF VETERANS AFFAIRS**

**Justification and Approval**

**For**

**Other Than Full and Open Competition**

1. **Contracting Activity:** Department of Veterans Affairs, VISN 11, 515 Medical Center  
515-14-4-583-0092
2. **Nature and/or Description of the Action Being Processed:** *Diagnostic X-Ray Systems Training – two weeks. Radiology staff is required to take RSTI training for X-ray certification. It is the training required for the type of purchased equipment we have purchased. August 4-15, 2014*
3. **Description of Supplies/Services Required to Meet the Agency's Needs:** *Required training. To be more proficient in training on and maintaining radiology related medical equipment within the facility and to have a better baseline understanding of the theory of maintaining this equipment prior to more advanced CT equipment training at a later date. August 4-15. Total \$4,225.50. Radiological Service Training Inst., 30745 Solon Road, Solon, OH 44139.*
4. **Statutory Authority Permitting Other than Full and Open Competition:** *41 U.S.C. 3304, as implemented by FAR 6.302-1.*
  - ( X ) (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):**
  - a. **Only One Responsible Source (FAR 6.302-1)** – *This radiology equipment is “highly specialized.” This training must be provided by this vendor. Only one company provides this specialist training for this specific equipment. They are the only firm capable of providing the services described in Section III above without the Veteran's Health Administration experiencing unacceptable delays in fulfilling its requirements.*
6. **Description of Efforts Made to ensure that offers are solicited from as many potential sources as deemed practicable:**

Sources Sought Synopsis: *We currently do not have a backup imaging person to service the Radiology Department. In addition, the primary Biomedical Technician responsible for these activities will be retirement eligible within a couple of years, making this training part of FMS's succession plan. This training will give the technician the basic's of imaging equipment repair such as terminology and x-ray production. As a result, research was done to see if other options were available, but have proved fruitless.*

Other Actions: *All other research to provide this training including market research proved unsuccessful, as there is no other company providing this training.*

7. **Determination by the Contracting Officer that the Anticipated Cost to the Government will be Fair and Reasonable:** *The cost is considered to be fair and reasonable based on the rates they provide to the general public. \$4,225.50.*
8. **Description of the Market Research Conducted and the Results, or a Statement of the Reasons Market Research Was Not Conducted:** *FAR Part 10 We have researched this training for this equipment with the results giving us a high level of confidence that no other qualified sources exist.*
9. **Any Other Facts Supporting the Use of Other than Full and Open Competition:** *No other vendor is available for full and open competition, thus no others are available. (see FAR 6.302-1(b)(2) and 6.303-2(a)(9)(i)).*
10. **Listing of Sources that Expressed, in Writing, an Interest in the Acquisition:** *See Section VI above.*
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:** *As this is the vendor used for the equipment, there is no plans for changes in the future for additional acquisitions of the services being acquired. There are no further actions planned (N/A).*
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: David Irvine  
Title: Chief, Learning Resources (142)  
Facility: Battle Creek VA Medical Center

7/14/2014  
Date

**13. Approvals in accordance with FAR 6.304** *This part is filled out by Contracting Staff as part of the Justification*

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

\_\_\_\_\_  
Name  
Title  
Network 11 Contracting Office

\_\_\_\_\_  
Date

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

\_\_\_\_\_  
Name  
Director of Contracting/Supervisory Contract Specialist (as appropriate)  
Network 11 Contracting Office

\_\_\_\_\_  
Date

- c. **SAO(If over \$650K)**: I certify the justification meets requirements for other than full and open competition.

\_\_\_\_\_  
Ricky L. Lemmon  
SAO Director  
Central Region

\_\_\_\_\_  
Date

- d. **VHA HCA Review and Approval**: I have reviewed the foregoing justification and find it to be complete and accurate to the best of my knowledge and belief and recommend approval (if over \$12.5 million) or approve (\$650K to \$12.5 million) for other than full and open competition.

NORBERT S. DOYLE  
Chief of Procurement and Logistics Officer  
VHA, Head of Contracting Activity (HCA)

\_\_\_\_\_  
Date

- e. **VA Deputy Senior Procurement Executive Approval (over \$12.5 million but not exceeding \$50 million):** I have reviewed the foregoing justification and find it to be complete and accurate to the best of my knowledge and belief and approve for other than full and open competition.

\_\_\_\_\_  
C. FORD HEARD  
Deputy Senior Procurement Executive (DSPE)  
Assistant Secretary for Acquisition and Logistics  
Department of Veterans Affairs

\_\_\_\_\_  
Date

- f. **VHA Senior Procurement Executive Approval (over \$50 million):** I have reviewed the foregoing justification and find it to be complete and accurate to the best of my knowledge and belief and approve for other than full and open competition.

\_\_\_\_\_  
JAN R. FRYE  
Deputy Assistant Secretary for Acquisition and Logistics  
Senior Procurement Executive (SPE)  
Department of Veterans Affairs

\_\_\_\_\_  
Date