

Veterans Health Administration (VHA)
Office of Geriatrics and Extended Care (GEC)
Veteran-Directed Home and Community Based Service (VD-HCBS) Program

JUSTIFICATION AND APPROVAL
OTHER THAN FULL AND OPEN COMPETITION

- 1. CONTRACTING ACTIVITY:** Department of Veterans Affairs (VA)
Office of Acquisition Operations
Strategic Acquisition Center – Frederick
321 Ballenger Creek Drive, Suite 125
Frederick, MD 21703

2. NATURE AND/OR DESCRIPTION OF THE ACTION BEING APPROVED:

This Justification for Other than Full and Open Competition is executed by the Strategic Acquisition Center – Frederick, Frederick, MD for Department of Veterans Affairs (VA) Veterans Health Administration (VHA) Office of Geriatrics and Extended Care (GEC) Veteran Directed Home and Community Based Service (VD-HCBS) Program. This activity proposes to negotiate a non-competitive award (sole source) with the Trustees of Boston College for the procurement of technical assistance, training, and financial readiness review support. Under this procurement, the contractor will provide support services and training to the Veterans Affairs Medical Center (VAMC), Veterans Integrated Service Networks (VISN), and Veterans Affairs Central Office (VACO) staff to establish Veteran-Directed Home and Community Based Services (VD-HCBS) Programs.

The Trustees of Boston College's National Resource Center for Participant-Directed Services (NRCPPDS) has been identified as the sole supplier that can provide all services sought under this requirement. A firm fixed price contract is anticipated to be awarded to the NRCPPDS for a six month period of performance.

3. DESCRIPTION OF THE SUPPLIES OR SERVICES:

The VD-HCBS Program is a major Veterans Health Administration (VHA) home care initiative in collaboration with the Administration for Community Living. The VD-HCBS Program provides an opportunity for the aging and disability network and VAMCs to modernize their approaches to service delivery in order to keep individuals at high risk of nursing home

placement in their homes, with an array of home and community based services. Under the VD-HCBS Program, the veteran and veteran's family caregiver are able to;

- a. Manage a flexible budget;
- b. Decide for themselves what mix of services will best meet their personal care needs;
- c. Hire their own personal care aides, including family or neighbors; and
- d. Purchase items or services to live independently in the community.

Veterans in this program receive an individualized needs assessment, support in developing their personalized care plan, and assistance in paying workers in accordance with local, state and federal laws from a trained case manager and fiscal management services provider.

In order to implement the VD-HCBS Program, the Contractor shall:

- a. Train VACO, VAMC, Region and VISN staff on the concepts and principles of sustainable participant veteran directed services;
- b. Provide program and financial readiness reviews of aging and disability agencies and
- c. Provide VACO, VAMC, Region and VISN staff who are planning to, or currently contracting with VD-HCBS vendors with "as needed" technical assistance.
 - Concepts in participant-direction;
 - Principles for purchasing Veteran-directed services;
 - Research findings of the participant directed model;
 - Business management of a participant-directed mode;
 - Billing and budget reconciliations; and
 - General question response.

The estimated cost for this procurement is [REDACTED]

4. STATUTORY AUTHORITY :

The statutory authority permitting other than full and open competition is 41 U.S.C.3304(a)(1) as implemented by the Federal Acquisition Regulation (FAR) Subpart 6.302-1 entitled, "Only One Responsible Source and No Other Supplies or Services Will Satisfy Agency Requirements."

5. RATIONALE SUPPORTING USE OF AUTHORITY CITED ABOVE:

In accordance with FAR 6.302-1(a)(2), the cited authority is required when

there is only one responsible source that can satisfy the Agency's need and provide the required services.

NRCPDS is recognized as a national leader in the area of home and community based services. The NRCPDS has developed handbooks on program operations and financial management in order to better assist state programs.

NRCPDS staff are leaders in the field of consumer directed care since its inception in 1999. NRCPDS actively partners with the United States Department of Health and Human Services (HHS), Centers for Medicare and Medicaid Services (CMS) pilot program, and the cash and counseling grant program.

NRCPDS has been identified as the sole supplier that can provide all services sought under this requirement. This organization has been performing services needed for this contract since 2010 with good performance. The period of performance for the current contract will end on December 31, 2014.

The Program Office is currently working with SAC-F acquisitions team to compete for a follow-on effort requiring services outlined in the PWS. It is expected the new contract will be in place by July 1, 2015, but this would result in a lapse of performance. This action is needed to prevent a lapse in service that is critical for the VA to ensure continued home health care support to aging and disabled Veterans.

6. EFFORTS TO ENSURE OFFERS ARE SOLICITED FROM AS MANY POTENTIAL SOURCES AS PRACTICABLE:

No market survey was conducted since these services are follow-on requirements to existing services. Market research was conducted at the time of the original award.

7. FAIR AND REASONABLE PRICE/COST DETERMINATION:

The anticipated cost to the Government will be deemed fair and reasonable through application of appropriate price analysis techniques and procedures IAW FAR 15.404-1(b)(2).

8. DESCRIPTION OF MARKET RESEARCH:

As outlined above in 6, Efforts to Obtain Competition, this is a follow-on action and therefore no market research was conducted. Market research will be conducted for the new contract to ensure offers are solicited from as many potential sources as is practicable.

9. OTHER FACTS SUPPORTING THE USE OF OTHER THAN FULL AND OPEN COMPETITION:

The Procuring Contracting Officer has determined that this proposed action meets all the requirements of FAR 6.302-1 Only One Responsible Source and No Other Supplies or Services Will Satisfy Agency Requirements, where a delay in award of the contract would result in an unacceptable delay in fulfilling the agency's requirement.

10.A LISTING OF SOURCES IF ANY, THAT EXPRESSED IN WRITING AN INTEREST IN THE ACQUISITION:

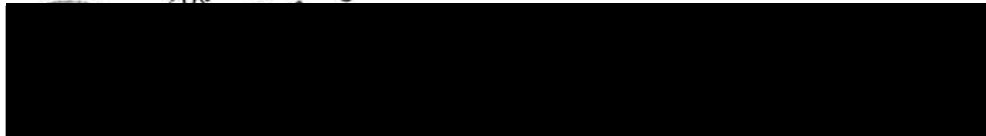
See ¶ 6 above.

11. ACTIONS NECESSARY TO OVERCOME ANY BARRIERS TO COMPETITION:

This requirement will be competed by VHA to the fullest extent possible, given documented market research.

12. TECHNICAL AND REQUIREMENTS CERIFICATIONS

I certify that the foregoing justification is complete and accurate to the best of my knowledge and belief



13. PROCURING CONTRACTING OFFICER CERTIFICATION:

I certify that this justification is accurate and complete to the best of my knowledge and belief. As this contract action does not exceed \$650,000, the certification below required by FAR 6.303-2(b)(12) serves as approval.

