

Chapter VI: Other Than Full and Open Competition (OFOC) SOP
Attachment 1: Justification for Limiting Sources \$3K up to \$150K

FAR 8 - JUSTIFICATION FOR LIMITING SOURCES <\$150K

Requirement or RFQ Number: 667-15-2-348-0070

1. Description of Action:

Nature: ☒ New Requirement ☐ Follow-on Order
☐ Mod to Existing Order Number Insert task/delivery order no.

Order against: ☒ FSS Contract Number: GS-23F-0042R

Name of Proposed Contractor: PEAK GOVERNMENT SERVICES, INC.
Street Address: 6920 Miramar Road, STE 305
City, State, Zip: San Diego, CA 92121
Phone: 1-888-440-2144

< Description of Supplies or Services:

The estimated value of the proposed action is \$ 59,150.00

Outpatient Coding Services are required to ensure compliance with VHA Directives and policies in the assignment of appropriate ICD-9-CM and CPT/HCPCS codes at a 95% accuracy rate and write the codes on the individual health record (or enter into the system if coding online) in accordance with the documentation and the provider's scope of practice.

2. Authority:

ORDER AGAINST FSS: Authority of the Multiple Award Schedule Program, Title III of the Federal Property and Administrative Services Act of 1949 (41 USC 251, et seq.); Title 40 USC 501, Services for Executive Agencies; and Section 803 of the National Defense Authorization Act of 2002 (PL 107-107) and implemented by FAR 8.405-6. Mark the applicable exception:

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

☐ Only one source is capable of providing the supplies or services required at the level of quality required because the supplies or services are unique or highly specialized; (FAR 8.405-6(a)(1)(i)(B)) or


☐ In the interest of economy and efficiency, the new work is a logical follow-on to an original Federal Supply Schedule order and the original order was placed in accordance with the applicable Federal Supply Schedule ordering procedures. **The original order was not previously issued under sole-source or limited-sources procedures.** (FAR 8.405-6(a)(1)(i)(C))


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3. Rational/explanation to support cited authority:

Overton Brooks VA Medical Center, is seeking a full service bridge (interim) contract for continued Coding Services. These services shall be rendered while the facility completes the requirement to seek a permanent contract. These services are currently being provided by the current contract holder; however, if the current requirement expires before a new requirement is put into place the medical center will be at risk. An award of an Interim Sole Source contract will ensure service continuity is maintained and will prevent interruption in service to the medical center. An Interim Sole Source contract will aid in continuous use of staff that has completed extensive training to acquire and access to the medical center network. Any lapse in service would cause the Government an undue hardship and will negatively impact quality care. Utilization of an Interim Sole Source vendor will eliminate and avoid a backlog of outpatient encounters which negatively impact VISN assigned Performance Measures.

4. BRAND NAME ONLY: This buy is estimated to exceed \$25,000 and this documentation will be posted along with the RFQ on e-Buy, as required by FAR 8.405-6(b) (3).
5. Note that this determination satisfies the requirements of FAR 8.405-6. The requirement to prepare a written justification IAW FAR 6.303 does not apply to Federal Supply Schedules.


Peggy Roberts
Coding Supervisor


Frederick Wilson
Contracting Officer
Date: 7 APR 15