

**Justification and Approval  
For Other than Full and Open Competition**

**POINT-IN-TIME (PIT) COUNT FOR THE ENUMERATION OF HOMELESS  
VETERANS**

1. **Contracting Activity:** Department of Veterans Affairs (VA)  
Office of Acquisition Operations  
Strategic Acquisition Center  
10300 Spotsylvania Avenue, Suite 400  
Fredericksburg, VA 22408
2. The Department of Veterans Affairs (VA) intends to award a sole source purchase order using simplified acquisition procedures as authorized by FAR 13.501(a). This requirement is for a firm-fixed price (FFP) purchase order to procure services in support of statistical sampling for the enumeration of homeless Veterans. This requirement is for the procurement of specialized services to be performed by Montana Statewide Continuum of Care (CoC); representing an area of the United States where the numbers of homeless Veterans are disproportionately high.

3. **Description of Supplies or Services.**

In 2009, President Barack Obama and then VA Secretary Eric K. Shinseki announced the goal of ending Veteran homelessness by the end of 2015. Together with partners and supporters nationwide, VA is determined to meet that challenge through the Homeless Veterans Outreach Initiative, an unprecedented commitment to those who served the nation but lack safe, secure housing. As of March 2015, Veteran homelessness has gone down 33.2% since 2010. Nationwide homelessness (all individuals) has gone down 9.7% since 2010. To further bolster this decrease, VA has increased programs and funding to help Veterans who are homeless or at risk of becoming homeless.

The Department of Housing and Urban Development (HUD) provides funding to eligible recipients that submit applications through a local Continuum of Care (CoC), which is a group of stakeholders committed to working towards preventing and ending homelessness within their community. A primary responsibility of a CoC is to organize and deliver housing and services to homeless populations living in the service area of the CoC. HUD requires CoCs to undertake a community-wide effort to collect information on the number and characteristics of individuals and families experiencing homelessness on a single night. These one-night counts, called point-in-time counts (PIT), must be conducted at least every two years (planning and funding in odd calendar years) during the last ten days in January or as approved by HUD, according to HUD's standards. The PIT count also includes estimates of particular homeless subpopulations, including Veterans. The current PIT count has limitations regarding the reliability and accuracy of the data. In past years, data on the number of Veterans

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experiencing homelessness often differed across sources. This is largely because of different methodologies used to collect the information. In 2011, HUD and VA - agreed to use the HUD PIT count as the definitive federal estimate of Veteran homelessness. Although the present enumeration is not perfect, the PIT count has become more rigorous over the years, and continues to provide a reliable and worthwhile estimate.

For many years, VA provided annual counts of homeless Veterans through a report called CHALENG (Community Homelessness Assessment, Local Education and Networking Groups for Veterans). At the same time, HUD was continuing to count all homeless persons, including homeless Veterans, during the annual PIT Count. In 2008, staff from VA and HUD refined the methodology for enumerating homeless Veterans during the PIT count and agreed that beginning in 2009, the PIT count would serve official count of homeless Veterans in the US.

Since then, the PIT estimate has become one of the primary resources for monitoring the status of VA's efforts to end homelessness among Veterans by the end of 2015. It is one of many metrics used by VA to inform the development and refinement of policies and programs that target homeless and at-risk Veterans. While important methodology changes were made prior to the January 2009 PIT Count, a recent analysis revealed that more can be done to improve the accuracy of PIT Count data. Specifically, due to insufficient resources in even numbered years, many HUD continuums of care carry forward data from the prior year rather than count unsheltered homeless persons in those years. This results in data reliability issues in even numbered years.

Counting homeless Veterans in even-numbered years in every CoC is not currently possible with existing resources, nor is it practical or necessary, since nearly 70 percent of homeless Veterans in the US are located in approximately 30 cities (identified as "priority" cities). Ensuring both sheltered and unsheltered Veterans are counted in those cities every year will enable models to be developed that can be used to extrapolate statistically reliable estimates for the remainder of the US. Previously conducted PIT count data has identified Montana Statewide as a priority city requiring an even year PIT count.

VA, therefore, intends to contract with Montana Statewide CoC to augment the existing efforts of HUD to overcome the challenges of collecting and reporting data on unsheltered homeless Veterans to ensure every homeless Veteran is counted in Montana Statewide and surrounding areas. This particular CoC was selected because it represents one of the priority cities where over 70 percent of homeless Veterans are living in the US. VA will contract with Montana Statewide CoC to supplement the current efforts and ensure there are sufficient resources for the accurate enumeration of unsheltered homeless Veterans.

Collecting accurate data on the numbers and characteristics of individuals and families experiencing homelessness is a critical part of VA planning and program

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development to end veteran homelessness. Accurate data on homeless Veteran populations will assist VA to:

- Understand changes in trends among homeless populations;
- Adjust the types of programs and services available according to need and use resources as efficiently as possible;
- Justify requests for additional resources and/or programming modifications;
- Comply with reporting requirements for HUD, the VA, other funders, and local stakeholders;
- Raise public awareness about the issue of homelessness; and
- Measure the progress of VA towards preventing and ending homelessness.

Prior to VA's 2010 directive instructing VA providers to partner with CoCs to ensure all client data is entered into the CoCs Homeless Management Information System (HMIS) database, data collection methodology, analysis and reporting efforts differed across data sources. This requirement will ensure continuance of a systematic collaborative and methodological approach to collecting required homeless Veteran data between HUD, VA, and Montana Statewide CoC.

Period of Performance: (estimated) Sept 2015 through June 2016

Estimated total cost: \$32,500.00 (no options)

#### **4. Authority Cited.**

The statutory authority permitting other than full and open competition is FAR 13.106-1(b).

#### **5. Reason for Authority Cited.**

The proposed acquisition is for services in support of statistical sampling for the enumeration of homeless Veterans in the community of Montana Statewide. This effort is in support of the President's goal of ending Veteran Homelessness by 2015. In order to achieve this goal, VA requires accurate and timely data regarding the prevalence of homelessness among Veterans. The United States Interagency Council on Homelessness (USICH), of which VA is a member, developed a performance management plan to monitor and report the progress of all Federal partners and communities in achieving the goal of zero homelessness. A critical component of the performance and management plan is the use of the local -HMIS to collect and report data. HMIS is a web based software application that records and stores both program and client information at the local CoC level. Each CoC uses an HMIS software product to store and report their data to the Department of Housing and Urban Development (HUD).

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HMIS has been implemented in 450 CoCs to collect data, report on trends, and service utilization. In 2010, VA set forth a Directive entitled, “VA Participation in the Homeless Management Information System (HMIS),” instructing VA providers to partner with CoCs to ensure all client data is entered into the CoCs HMIS database.

The proposed services are needed to upgrade and enhance the current capabilities of the existing Point-in-Time count effort currently being planned and executed by Montana Statewide CoC. By partnering with HUD and piggybacking on existing resources and efforts, this requirement helps VA reduce costs by optimizing data collection resources and boosting both the productivity and capacity of Montana Statewide. This solution will improve data utilization, responsiveness, availability, security and data integrity.

Because Montana Statewide already performs PIT counts, their personnel already have the training, skills, and organization in place to conduct the enumeration of homeless persons in their community. This requirement will provide additional resources to enable Montana Statewide to take any/all additional steps necessary to ensure every homeless Veteran is counted. The procurement of these services is mandatory because VA depends on PIT data to identify and address the diverse needs of homeless Veterans. This procurement allows VA to continue operations while ensuring delivery of the required data collection, analysis, and data reporting services.

VA requires a solution that is compatible with the existing PIT count data collection methodology, analysis and reporting efforts of the currently trained staff of the Montana Statewide CoC and HUD’s national data collection guidance. Montana Statewide CoC is the only entity that meets the Government’s requirements. In addition, Montana Statewide, in collaboration with HUD, has made substantial investments in the existing infrastructure to ensure a systematic, reliable and uniform approach and methodology for conducting the PIT count. Continued services by Montana Statewide are required to prevent unreliable data analysis and problems caused by using multiple methodologies in data collection. Using any other source for data collection and reporting provides no demonstrable value as it would cause unacceptable delays in sustaining VA’s critical mission; to locate and identify homeless Veterans. Additional training and duplication of effort would be necessary in order to bring staff up to Montana Statewide present level of operational proficiency thus duplicating costs already expended in arriving at the current level of effort.

The proposed source for this action is:

Montana Continuum of Care  
321 E. Main St., Suite 316  
Bozeman, MT 59715  
(406) 586-1572

**6. Efforts to Obtain Competition.**

There is only one responsible source for this particular effort. Efforts made to locate additional sources are described under the “Market Research” paragraph of this document demonstrate Montana Statewide CoC is uniquely positioned to provide the required services. As the requirement may change, future efforts will be made to ensure that offers are solicited from as many potential sources as is practicable.

Additionally, IAW FAR 13.105, this Justification will be made available for public inspection and will be posted to <http://www.fbo.gov> within 14 days of contract award in order to increase possibility of future competition.

**7. Fair and Reasonable Determination.**

The contracting officer will make a fair and reasonable determination based on industry pricing, subject matter experts’ knowledge of the market and required effort to support the objectives, and in accordance with allowable and allocable costs per the FAR.

**8. Market Research.**

Market research efforts to identify a provider for aforementioned services included a review of VetBiz, GSA and VA federal supply schedules, and Ability One. No viable sources were identified. Additionally, VA Directive entitled, “VA Participation in the Homeless Management Information System (HMIS),” directs VA providers to partner with local CoCs to ensure all client data is entered into the HMIS database. No other CoC exists in the Montana Statewide region.

Market Research concluded that Montana Statewide CoC is uniquely positioned to provide the required services. As the requirement may change, future efforts will be made to ensure that offers are solicited from as many potential sources as is practicable. Additionally, IAW FAR 13.105, this Justification will be made available for public inspection and will be posted to <http://www.fbo.gov>.

**9. Other supporting facts.**

None.

**10. Interested Sources.**

Montana Continuum of Care  
321 E. Main St., Suite 316  
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**11. Actions to Increase Competition.**

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VA will continually conduct market research to assess the best solutions. Future requirements will be evaluated to determine and provide for the Government's best interest.

VA will continue to monitor the usefulness, reliability and the agency's satisfaction with Montana Statewide CoC performance of services in support of statistical sampling. Should the current support services fail to meet the Government's requirements, competition will be sought in future acquisitions of this product.

**APPROVED**

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