

**DEPARTMENT OF VETERANS AFFAIRS**

**Justification and Approval**

**For**

**Other Than Full and Open Competition**

1. **Contracting Activity:** Department of Veterans Affairs, VISN 23, and VA Black Hills Health Care System.  
Justification for other than full and open competition for telecommunication services.
2. **Nature and/or Description of the Action Being Processed:**  
Sole source procurement for continued telephone services for Hot Springs VA, Pine Ridge, SD CBOC, and Martin Vet Center from Golden West Companies. A firm fixed price contract is anticipated.
3. **Description of Supplies/Services Required to Meet the Agency's Needs:**  
This request is to continue existing voice communications at the Hot Springs VA Medical Center and CBOC's (Pine Ridge CBOC, and Martin Vet Center) with Golden West Companies. Estimated monthly charges are \$4,500.00 per month. Total for 2016 is \$54,000.00
4. **Statutory Authority Permitting Other than Full and Open Competition:**  
  
  - (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):**  
The telephone services being provided are for very specific rural areas with no other carriers providing telephone service without having to channel through Golden West Communications. Other telephone service providers would "sub-contract" with Golden West Communications creating additional costs to the government. Golden West Communications is the only firm capable of providing the services described in Section III above without the Veteran's Health Administration experiencing substantial duplication of cost that could not be expected to be recovered through competition and 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:**  
Golden West Companies is the only telecommunication provider in the areas where service is needed by the VA BHHCS.
7. **Determination by the Contracting Officer that the Anticipated Cost to the Government will be Fair and Reasonable:**

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

The current market research conducted by contacting telephone carries indicates Golden West Communications is the only carrier that reaches the rural areas needing telephone coverage.

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

Golden West Communications is the only telephone carrier that supports the specific rural area affiliated VA clinics requiring telephone service.

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

No other telephone carriers have expressed in writing an interest in providing services to our rural clinics.

**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:**

The Black Hills Health Care System will contact any new carriers that may move into the area.

**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.

_____	08/17/2015
Name – Jeanine Dodson	_____
Title – Facility CIO	Date
Facility – VA BHHCS	

**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.

_____	_____
Name	Date
Title	
Facility	

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

_____	_____
Name	Date
Network Contract Manager	
VISN/PCA X	
Title	
Facility	

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

_____	_____
Name	Date
Director	
Service Area Office, East	

- 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.

_____	_____
Name	Date
Chief Procurement and Logistics Officer	
VHA Head of Contracting Activity (HCA)	

- 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	Date
Deputy Senior Procurement Executive (DSPE)	
Office of Acquisition and Logistics	
Department of Veterans Affairs	

- 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	Date
Deputy Assistant Secretary for Acquisition and Logistics	
Senior Procurement Executive (SPE)	
Department of Veterans Affairs	