

LIMITED SOURCES JUSTIFICATION
FAR PART 8.405-6 Order or BPA >\$150,000

2237 Transaction # or Vista Equipment Transaction #: 663-16-2-523-0017

This acquisition is conducted under the authority of the Multiple Award Schedule Program. The material or service listed in par. 3 below is sole source, therefore, consideration of the number of contractors required by FAR Subpart 8.4 – Federal Supply Schedules, is precluded for the reasons indicated below.

Restricted to the following source:

Manufacturer/Contractor: NuWest Group Holdings, LLC
Manufacturer/Contractor POC & phone number: Rochelle Jones: 425-602-5724
Mfgr/Contractor Address: 11820 Northrup Way Ste E310, Bellevue WA 98005-2037
Dealer/Rep address/phone number: Rochelle Jones: 425-602-5724
FSS Contract Number: V797P-7184A

☒ The requested material or service represents the minimum requirements of the Government.

(1) IAW FAR 8.405-6 AGENCY AND CONTRACTING ACTIVITY:

Department of Veterans Affairs
Network Contracting Office 20
1495 Wilmington Dr, Suite 360
DuPont, WA 98327

Network Contracting Office (NCO): 20

(2) IAW FAR 8.405-6 NATURE AND/OR DESCRIPTION OF ACTION BEING APPROVED:

This procurement is for a temporary help agency to supply phlebotomists (PBT) while Puget Sound Health Care System (PSHCS), Seattle, WA, brings on the newly hired civil servant phlebotomists.

(3)(a) IAW FAR 8.405-6 A DESCRIPTION OF THE SUPPLIES OR SERVICES REQUIRED TO MEET THE AGENCY'S NEED:

VA PSHCS has a need for PBT services in support of Pathology and Laboratory Medicine Service (P&LMS). The PBT must be able to provide phlebotomy and basic laboratory processing. The requirement is for each PBT to provide services and technical assistance to the P&LMS Inpatient and Outpatient phlebotomy areas. The P&LMS section can only proceed with a qualified phlebotomy specialist. The PBTs will be assigned to the Client Services section and will increase the efficiency of product output and patient care. The Scope of Work involves the following primary functions:

- Inpatient and outpatient blood collections
- Accessioning and logging in of Veterans in an outpatient setting

- Accessioning, processing of laboratory specimens.

Phlebotomists will be required to work up to 40 hours a week with varying shifts based on VAPSHCS needs. P&LMS is estimating 4 contract phlebotomists (3 for the Seattle campus and 1 for the American Lake campus, totaling 4,160 hours for the initial 6 months (with possible additional 4,160 hours under FAR 52.217-8).

(b) ESTIMATED DOLLAR VALUE: \$216,652.80 (6 months + possible additional 6 months under FAR 52.217-8)

(c) REQUIRED DELIVERY DATE or PERFORMANCE PERIOD: 3/15/2016 – 9/14/2016 (with possible additional 6 months under FAR 52.217-8: 9/15/2016-3/14/2017)

(4) IDENTIFICATION OF THE JUSTIFICATION AUTHORITY AND SUPPORTING RATIONALE (SEE FAR 8.405-6), AND IF APPLICABLE, A DEMONSTRATION OF THE PROPOSED CONTRACTOR'S UNIQUE QUALIFICATIONS TO PROVIDE THE REQUIRED SUPPLY OR SERVICE.

☒ In accordance with FAR 8.405-6(a)(1)(i)(B) and FAR 8.405-6(b) Specific characteristics of the material or service that limit the availability to a sole source (unique features, function of the item, unique qualifications of the proposed source, etc.).

NuWest Group Holdings LLC is the incumbent contractor under V797P-7184A VA260-14-F-0173 which will expire on 3/14/2016. Only this source can provide the needed service because NuWest's phlebotomists have already cleared through the lengthy security process.

☐ In accordance with FAR 8.405-6(a)(1)(i)(B) and FAR 8.405-6(a)(2)(iii) A patent, copyright or proprietary data limits competition. Do not include specific proprietary data. Only mention the type of equipment, procedure, etc. to show that proprietary supplies or services are being procured.

☐ In accordance with FAR 8.405-6(a)(1)(i)(B) and FAR 8.405-6(b) These are "direct replacements" parts/components for existing equipment.

☐ In accordance with FAR 8.405-6(a)(1)(i)(B) and FAR 8.405-6(b) The material/service must be compatible in all aspects (form, fit and function) with existing systems presently installed/performing. Describe the equipment/function you have now and how the new item/service must coordinate, connect, or interface with the existing system.

☐ In accordance with FAR 8.405-6(a)(1)(i)(C) and FAR 8.045-6(b)(2) The new work is a logical follow-on to an original Federal Supply Schedule order provided that the original order was placed in accordance with the applicable Federal Supply Schedule ordering procedures. The original order must not have been previously issued under sole source or limited source procedures.

☒ In accordance with FAR 8.405-6(a)(1)(i)(A) An urgent and compelling need exists, and following the ordering procedures would result in unacceptable delays. The current Task Order expires 3/14/2016. Considering the VA time needed to request quotations, have agreement on qualified candidates, and clear candidates through security, P&LMS would not be able to efficiently service inpatient and outpatient blood collections and accession and process laboratory specimens. This requirement is submitted as an emergency due to an immediate need to address staff shortages until the VA is able to hire for the positions. Currently Human Resources is working to onboard 3 phlebotomists, but the new hires will not be onboard prior to the current contract expiring. The requirement is for 3 phlebotomists for Seattle and 1 for American Lake to provide immediate coverage for current staff shortages. VA PSHCS's need to continue blood collection and processing of laboratory specimens constitutes an urgent, critical need for uninterrupted services while VA PSHCS continues the pursuit of onboarding PBT through Human Resources.

(5) DESCRIBE WHY YOU BELIEVE THE ORDER REPRESENTS THE BEST VALUE CONSISTENT WITH FAR 8.404(d), FAR 8.405-1(c), FAR 8.405-1(f), FAR 8.405-6(c)(2)(v) TO AID THE CONTRACTING OFFICER IN MAKING THIS BEST VALUE DETERMINATION:

VA National Acquisition Center's (NAC) contract prices for PBT services range from \$22.00 - \$46.47 per hour. NuWest has been awarded a Federal Supply Schedule (FSS) and has PBT services listed at \$ [REDACTED] per hour. NuWest is local and has been able to provide PBT services without charging the VA additional money for lodging and per diem.

(6) IN ACCORDANCE WITH FAR 8.405-6(b)(1) and FAR 8.405-6(c)(2)(ii) DESCRIBE THE MARKET RESEARCH CONDUCTED AMONG SCHEDULE HOLDERS AND THE RESULTS OR A STATEMENT OF THE REASON MARKET RESEARCH WAS NOT CONDUCTED:

The Contracting Officer conducted Market Research on 2/5/2016 using VA's MedSurge (eCMS Briefcase P02 for spreadsheet). There are 62 NAC FSS holders. The

incumbent is a Small company. PBT services are commercial; they are performed at non-government locations and for non-government reasons.

(7) IN ACCORDANCE WITH FAR 8.405-6(c)(2)(vii) ANY OTHER FACTS SUPPORTING THE JUSTIFICATION:

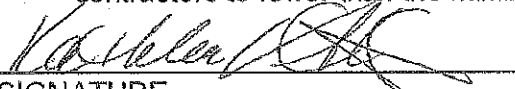
FAR 52.217-8, Option to Extend Services will be included in the Task Order as a safety valve should the VA be unable to finish hiring expeditiously. Additionally, P&LMS just received notice from another phlebotomist who will resign in April. VA PSHCS is having trouble hiring PBTs, and turnover is high in this career field.

(8) IN ACCORDANCE WITH FAR 8.405-6(c)(2)(viii) A STATEMENT OF THE ACTIONS, IF ANY, THE AGENCY MAY TAKE TO REMOVE OR OVERCOME ANY BARRIERS THAT LED TO THE RESTRICTED CONSIDERATION BEFORE ANY SUBSEQUENT ACQUISITION FOR THE SUPPLIES OR SERVICES IS MADE:

The VA intends to finish the onboarding process for civil servant PBTs and to advertise again to replace the PBT that just gave notice.

(9) IN ACCORDANCE WITH FAR 8.405-6(c)(2)(x) 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. I understand that processing of this limited sources justification restricts consideration of Federal Supply Schedule contractors to fewer than the number required by FAR Subpart 8.4.


SIGNATURE

2-5-16
DATE

Kathleen V. Aldridge
NAME

Manager
TITLE

Pathology and Laboratory Medicine
SERVICE LINE/SECTION

VA Puget Sound Health Care System
FACILITY

**(10) APPROVALS IN ACCORDANCE WITH FAR 8.405-6(d) and the VHAPM at:
VHAPM, Volume 6, Chapter VI: OFOC SOP**

a. CONTRACTING OFFICER'S CERTIFICATION (required IAW FAR 8.405-6(c)(2)(ix)): I certify that the foregoing justification is accurate and complete to the best of my knowledge and belief.

Darlene J.
Anderson 462963

Digitally signed by Darlene J. Anderson
462963
DN: dc=gov, dc=va, o=internal, ou=people,
0.9.2342.19200300.100.1.1=darlene.anderson
Alpha.gov.cn=Darlene J. Anderson-462963
Date: 2016.02.17 11:20:34 -0800

2-9-2016

CONTRACTING OFFICER'S SIGNATURE

DATE

Darlene Anderson
Contracting Officer
NAME AND TITLE

Network Contracting Office 20
FACILITY

b. NCO Director/Designee: I certify that the foregoing justification is accurate and complete to the best of my knowledge and belief.

Thomas R. Guyer
901226

Digitally signed by Thomas R. Guyer 901226
DN: dc=gov, dc=va, o=internal, ou=people,
0.9.2342.19200300.100.1.1=tom.guyer@va.gov, cn=Thomas
R. Guyer 901226
Date: 2016.02.19 07:12:48 -0700

19 Feb 2016

Thomas R. Guyer
Chief, Division 1 Contracting
Network Contracting Office 20 (NCO 20)

DATE