

**DEPARTMENT OF VETERANS AFFAIRS
JUSTIFICATION AND APPROVAL
For
Other than Full and Open Competition**

1. **Contracting Activity:** Department of Veterans Affairs, VISN/NCO 19 Oklahoma City Veterans Health Care System, providing Primary Care Services for Veteran patients in the Altus, Jackson County, Oklahoma catchment area, via a Community Based Outpatient Clinic.
2. **Nature and/or Description of the Action Being Processed:** Interim contracting authority being requested from the Medical Sharing Office for a 6 month period, April 1, 2016 through September 30, 2016, during which the long-term solicitation will continue to be processed through contract award.
3. **Description of Supplies/Services Required to Meet the Agency's Needs:** Primary Care Patient Services via a Community Based Outpatient Clinic for approximately 650 patients in Altus, Jackson County, Oklahoma Catchment area. See Cost Estimate below.

PRICE / COSTS spreadsheet inserted below.

SECTION B - SUPPLIES OR SERVICES AND PRICE COSTS as covered in contract VA256-P-0641 with exceptions noted*			
CAPITATED RATES	Monthly Rate	Total Months	Total
650 patients at \$48.62 per member/per month	\$31,603	6	\$189,618
(based on recent patient trends for calendar year 2016)			
MENTAL HEALTH SERVICES			
TELEHEALTH SERVICES			
Telehealth Services space	\$1,600	6	\$9,600
MONTHLY TOTALS	\$33,203	6	\$199,218
6 MONTH GRAND TOTAL	\$199,218		

4. **Statutory Authority Permitting Other than Full and Open Competition:**

- () (1) Only one Responsible Source and no other supplies or services will satisfy Agency Requirements per FAR 6.302-1;
- (X) (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):**

To ensure continuity of care to Veteran patients enrolled in the Altus, OK CBOC, it is imperative that interim contracting authority is requested and an interim contract awarded to the current contractor until the long-term competitive contract can be completed. The current contractor is fully trained in the usage of VA software and equipment for documentation of patient medical information into the CPRS (Computerized Patient Record System), VISTA for scheduling patient appointments and extracting necessary daily reports and has adequate staff to cover the needs of Veterans seeking medical care. This approach will ensure the urgent need for continued care can be met.

Unusual and Compelling Urgency: The current contract for the Altus, OK CBOC expires March 31, 2016. A follow-on competitive solicitation has received MSO and VHA Patient Care Services technical and legal review and will be posted to FBO; however, completion of the long term contract cannot be accomplished prior to the expiration of the current contract. The clinic patients would incur significant delays in health care services and subject to potentially serious harm if a sole source interim contract is not put into place.

6. Description of Efforts Made to ensure that offers are solicited from as many potential sources as deemed practicable: Due to the emergent nature of the requirement, services and care to the Veterans cannot be interrupted. This **six** month interim contract is a temporary measure during which time the competitive long-term contract will be completed and awarded.

7. Determination by the Contracting Officer that the Anticipated Cost to the Government will be Fair and Reasonable: Current pricing is comparable with other CBOC's of this size and nature, current pricing will remain the same during the transition period.

8. Description of the Market Research Conducted and the Results, or a Statement of the Reasons Market Research Was Not Conducted: No market research was conducted to the extension to contract. This is an established CBOC and documentation has been provided for the full and open competitive contract. However, due to the emergent nature of this requirement,

and the necessity to have uninterrupted service, the contractor must be familiar with the Oklahoma City VAMC requirements and be able to immediately provide the required services.

9. Any Other Facts Supporting the Use of Other than Full and Open Competition: As stated in above paragraph 8, due to the emergent nature of the requirement and the ability of Integris Family Clinic to continue service, it is in the best interest of the Government to implement this interim contract until the Government can complete the long-term competitive contract.

10. Listing of Sources that Expressed, in Writing, and Interest in the Acquisition: N/A

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: Due to the emergent nature of this action there is not time to promote competition. It is the Government's intention to continue processing the competitive requirement for a new contract for the Altus CBOC.

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.

Teresa M. Harmon
Program Manager
Oklahoma City VAMC

Date

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

Fredrick Wilson
Contract Specialist
Network Contracting Office 16

Date

- b. **P&C:** I certify that the foregoing justification is accurate and complete to the best of my knowledge and belief.

David Miller

Date

Division 1 Chief, Purchasing and Contracting
Network Contracting Office 16

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

Aaron Villalpando

Date

Director of Contracting
Network Contracting Office 16