

**DEPARTMENT OF VETERANS AFFAIRS**

**Justification and Approval (J&A)**

**For**

**Other Than Full and Open Competition (>\$150K)**

**Acquisition Plan Action ID:** 405-16-2-863-0005

1. **Contracting Activity:** Department of Veterans Affairs, NCO1, *Manchester VA Medical Center*; Procurement for White River Junction VA Medical Center, , 2237 No 405-16-2-863-0005 (56,000.00) Total Base Plus 3 Option Years: \$356,702.00
2. **Nature and/or Description of the Action Being Processed:** White River Junction VAMC has been awarded three research grants to analyze mental health quality and safety using retrospective analysis of medical records data. A fourth similar proposal is pending and subsequent proposals are anticipated. Due to the increasing complexity of VAMC data warehousing, specific expertise in creating datasets containing mental health-specific variables is required. These projects require an in-depth knowledge of structured and unstructured variables stored in VA data repositories.
3. **Description of Supplies/Services Required to Meet the Agency's Needs:** The contractor shall implement dataset development plans according to protocols described in funded research proposals and shall assist in the preparation of new funding proposals. This includes researching best practices for representation of each variable using available best practice guidelines, collaborating with programmers at other centers to develop and archive best practice code when none is available, performing validation, and developing analytic datasets. This will involve the application of high level skills in SAS programming and text analysis. The contractor will write concise methods descriptions for medical journal manuscripts.
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):** Only One Responsible Source (FAR 6.302-1) Christine Westgate is a Veteran and data analyst. She is highly experienced in working with medical claims data and medical records data. Over the last four years, she has focused her efforts on the VA. As a VA work study student, she began using VA medical records text for natural language processing tasks. As a contractor of the local research non-profit, she developed high-level skills in using the VA corporate data warehouse (CDW) to develop datasets for industry-sponsored

pharmacoepidemiology studies. She also aided in development of several mental-health focused grant proposals, which are now funded. She helped develop data management plans for these projects by researching structured and unstructured fields of the VA CDW and through extensive review of VA best practice guidelines. Our funded projects require a combination of skills including in-depth knowledge of the VA CDW and tools to access that data (e.g. SAS), in-depth knowledge of related VA datasets (e.g. performance measurement, Department of Defense deployment datasets), and the ability to access and process VA text records on a national scale by efficiently using data management and analysis software. Furthermore, the projects require close collaboration with the PI, which necessitates in-person meetings. There is no other local person with these skills and the required knowledge of the research to be completed.

6. **Description of Efforts Made to ensure that offers are solicited from as many potential sources as deemed practicable:** There is no other local person with these skills and the required knowledge of the research to be completed.

7. **Determination by the Contracting Officer that the Anticipated Cost to the Government will be Fair and Reasonable:** Industry standard rates for VINCI in-house programming are shown below. Ms. Westgate brings additional skills in mental health-specific variables, grant preparation, and manuscript preparation. Given her skills and knowledge of the work to be completed, this contract with Ms. Westgate represents an excellent value for the VA.

Current hourly rates charged by VINCI for in-house programming are as follows:

Junior Analyst - \$52 per hour

Senior Analyst - \$81 per hour

Natural Language Processing - \$174 per hour

This research requires senior-level analyst skills as well as natural language processing skills.

8. **Description of the Market Research Conducted and the Results, or a Statement of the Reasons Market Research Was Not Conducted:** Market research was not completed beyond Ms. Westgate due to the reasons above.

9. **Any Other Facts Supporting the Use of Other than Full and Open Competition:** As Ms. Westgate has developed the data management plans for the studies to be completed and has initiated dataset development activities; it would be extremely difficult to transition over to a new analyst. Ms. Westgate has worked extensively with the PI and research collaborators to develop code to best represent variables needed for the research. Furthermore, she is approved by the local R&D committee and IRB as well as VA national data systems as a member of the research team and has access to all study data. At this point, her continued involvement in research is critical to project completion.

Ms. Westgate played an active role in the development of the work to be accomplished and therefore has thorough knowledge of the background and history of the projects she will be involved with as it relates to maintaining this database.

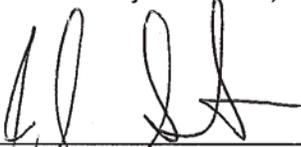
Since completion of her VA work study experience, Ms. Westgate has been doing ad-hoc contract work for the PI in addition to her work for the local research non-profit. Because her portfolio of VA-funded research has grown, it is now expected that her services will be needed on a regular and

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ongoing basis. Therefore, it is necessary to develop a contract that encompasses the planned research activities.

Ms. Westgate was already a highly experienced programmer and analyst when she came to the VA. It has taken three years of working with the PI and collaborator through various training and work experiences to get her up to speed for her current level of performance. Even if we were to find another local contractor of Ms. Westgate's caliber, training that person to work with VA-specific data, familiarizing that person with current research protocols and work accomplished, and transitioning regulatory approvals and programming tasks to that person would cause unacceptable delays.

10. **Listing of Sources that Expressed, in Writing, an Interest in the Acquisition:** No other sources expressed interest in this acquisition.
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:** It is highly recommended that any contracted service personnel have a thorough knowledge of the background and history of this equipment so they can properly address the most likely problems that potentially will occur during the service contract period.
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.

  
\_\_\_\_\_  
Jordan Soncrant  
Administrative Assistant, Chief in quality  
And Safety Program  
White River Junction VAMC

08MAY2016  
\_\_\_\_\_  
Date

13. **Approvals in accordance with the VHAPM, Volume 6, Chapter VI: OFOC SOP.** *This part if filled out by Contracting Staff as part of the Justification*

- a. **Contracting Officer's Certification (required):** I certify that the foregoing justification is accurate and complete to the best of my knowledge and belief.

Lorrie A. Baines  
154610  
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Lorrie Baines  
Branch Chief, Services Team North  
Network Contracting Office 1

Digitally signed by Lorrie A. Baines 154610  
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3/17/2016  
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Date

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- b. **Director of Contracting /Designee (Required \$150K and above):** I certify the justification meets requirements for other than full and open competition.

William A  
Nalls 253622

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William Nalls  
Division Chief  
Network Contracting Office 1

\_\_\_\_\_  
Date

Department of Veterans Affairs

Department of  
Veterans Affairs

MEMORANDUM

Date: May 5, 2016

From: Brian Shiner (151)

Subj: Sole Source Justification additional information

To: Richard Coutermarsh (90)

1. Thank you for the time to speak with us regarding the sole source justification for the Christine Westgate contract. As requested in the phone call, below outlines some additional information that was not available before now.
2. Ms. Westgate has been working with Dr. Shiner on multiple VA research projects. She advised during the development stages of the grant process as well helping with the design. Dr. Shiner and Ms. Westgate have been working together on this dataset for three years to help further the research portfolio. At this point, any interruption in this would result in a lack of successful execution of over \$1.5m. There simply would be nothing to show for this expenditure.
3. As discussed in our conversation, Ms. Westgate has been named in the grants that were reviewed by Central Office. I have attached the budget justification where she is named. In research, many of the grants that an investigator does will often use the same dataset looking at a variety of questions, therefore she is working on a variety of funded research projects where she was not originally named as well as the one she is named in. As she was the one who developed the dataset examining the care delivered to over 800,000 Veterans with PTSD over the recent 10 year period of VA expansion. This dataset incorporates Pharmacy, visits, demographics and natural language processing of note text. Put simply, this is the most complicated data set for PTSD cohort ever developed.
4. As you can see, Ms. Westgate is by far the only qualified to complete the work for these multiple projects. Training another programmer would take several years and would prevent the successful completion of these projects in the timeframe allotted.
5. It is extremely important to remember when looking at the costs of Ms. Westgate that no VA medical care dollars are being expended to support this project. The funds supporting this contract are strictly from special funding. Furthermore, she will not be receiving any benefits, thus it is less expensive than hiring a VA paid FTEE and much less expensive than Advanced Programming and Natural Language processing provided by VINCI services as cited in the sole source justification.
6. Thank you for the opportunity to clarify these issues and please feel free to contact us directly if we can provide anything further to help facilitate this contract execution.



Brian Shiner, MD  
Principal Investigator  
HSR&D CDA Awardee  
Patient Safety Center of Inquiry Director



Diane Rivera  
Acting ACOS/Research