

**DEPARTMENT OF VETERANS AFFAIRS**

**Justification and Approval (J&A)  
For  
Other Than Full and Open Competition (>\$150K)**

**Purchase Request (VA2237) – 580-16-1-7729-0011**

1. **Contracting Activity:** This document constitutes justification and approval for other than full and open competition for the acquisition described herein, under the authority of FAR 6.302-2. It is executed on behalf of Department of Veterans Affairs, VISN 16, 580 Michael E. DeBakey Medical Center- Houston, TX 77030 to:

Directions of Recovery, Inc.  
513 Thornton St.  
Houston, TX 77018  
Office: 713-695-5242

Purchase Order Number: 580-C50200

2. **Nature and/or Description of the Action Being Processed:**

The Michael E. DeBakey Medical Center proposes to procure by means of other than full and open competition services for homeless veterans in need of transitional housing and rehabilitative services with same vendor, Directions of Recovery, Inc. (VA256-15-C-0133) for the period of July 1, 2016 – November 30, 2016 until such time as a long term contract can be solicited and awarded.

3. **Description of Supplies/Services Required to Meet the Agency's Needs:**

*Through the Michael E. DeBakey HCHV program, VA provides case management services to Veterans and facilitates their access to a broad range of medical, mental health, and rehabilitative services. The work to be performed is substance abuse residential treatment services for homeless veterans to include 30 male veterans for a two month period. The total estimated values of the acquisition is \$229,500. Directions of Recover, Inc. is the current contractor who can provide emergency transitional housing, substance abuse treatment, case management, life skills development, and transportation to homeless Veterans suffering from mental illness (MI), substance use disorders (SUD), and/or physical disabilities. Contractor shall offer a safe, secure, and therapeutic environment that supports Veterans' rehabilitation goals. The Contractor will not be required to provide detoxification or other hospital level treatment – those services will be provided by the VA at the VA facilities.*

*Homeless Veterans served shall include:*

1. *Male veterans with MI, SUD, and/or physical disabilities.*
2. *Residential treatment for male veterans with co-occurring disorders (MI and SUD).*

*The Contractor may provide services and accommodations to 30 men as long as those services provide safety and appropriate protection of the individuals. Contractor shall ensure appropriate safety precautions are in place to reduce the risk of harm.*

**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;
- (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):**

The statutory authority cited in FAR 6.302-1, Only One Responsible Source, is necessary as the array services requested by the VAMC and provided at Directions of Recovery are considered highly specialized. Accordingly, Directions of Recovery, Inc. was identified as the only program capable of providing the services described in Section III above without the Veteran's Health Administration experiencing unacceptable delays in fulfilling its requirements of providing the above mentioned services to Veterans.

Additionally, the statutory authority cited in FAR 6.302-2, Unusual and Compelling Urgency, is also necessary as a delay in award of this contract would result in serious injury, financial and/or other, to the government as this is for the continued housing and residential treatment for 30 homeless veterans, who have been diagnosed with comorbid medical, mental health, and substance abuse addictions. These veterans are presently receiving care at this facility. A discontinuation of this contract would result in immediate homelessness of the 30 veterans and serious risk of substance abuse relapse. Substance Abuse relapse and homelessness are both high risk indicators which would post significant barriers to re-engaging veterans for future services and preventing potential harm to veterans. The continuation of the services provided by Directions of Recovery is vital to preclude impairment of the Michael E. DeBaakey's healthcare delivery capabilities and mission performance.

**6. Description of Efforts Made to ensure that offers are solicited from as many potential sources as deemed practicable:**

A competitive solicitation was posted to the Federal Business Opportunities website in February of 2014 and May of 2014 as a small business set aside. 10 contractors were identified through market research that may be a capable of providing the services. It was anticipated adequate competition would be achieved in this procurement. Additionally market research was conducted in 11/2015, to identify providers who could meet the requested need.

**7. Determination by the Contracting Officer that the Anticipated Cost to the Government will be Fair and Reasonable:**

No change in price from previously awarded contract, which was determined fair and reasonable, is anticipated. Based on current and past rate paid to vendor, the anticipated cost is a rate of \$50 per day.

Chapter VI: Other Than Full and Open Competition (OFOC) SOP  
Attachment 3: Request for Sole Source Justification Format >\$150K

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

*Market research was conducted in 11/2015. As a result of the market research conducted at this time, it was concluded Directions of Recovery, Inc. was the sole provider who could provide the array of highly specialized requested services with Directions of Recovery is the current contractor in place and has the resources necessary to maintain continuity of care during the final contract underwriting phase.*

*Both the COR and CO have knowledge these services are a commercial item.*

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

N/A

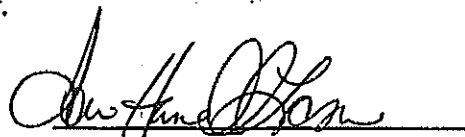
10. **Listing of Sources that Expressed, in Writing, an Interest in the Acquisition:**

Directions of Recovery, Inc. (Incumbent Contractor)  
513 Thornton St.  
Houston, TX 77018  
Office: 713-695-5242

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:**

A competitive solicitation was posted to the Federal Business Opportunities website in February of 2014 and May of 2014 as a small business set aside. 10 contractors were identified through market research that may be capable of providing the services. It was anticipated adequate competition would be achieved in this procurement. Additionally market research was conducted in 11/2015, to identify providers who could meet the requested need.

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.



Luis Paulino  
Program Director/HCHV  
Michael E. DeBakey VAMC

06-28-16  
Date

13. **Approvals in accordance with the VHAPM, Volume 6, Chapter VI: OFOC SOP.**

Chapter VI: Other Than Full and Open Competition (OFOC) SOP  
Attachment 3: Request for Sole Source Justification Format >\$150K

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

Orelia Parker

Name

Title

Date

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

Calvin Q. Ma 630986

Aaron Villalpando

NCO 16 Director of Contracting or Designee

Date

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

Name

Director, Service Area Office, \_\_\_\_\_

Date

- 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

VHA Head of Contracting Activity (HCA)

Date

- 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.