

Chapter VI: Other Than Full and Open Competition (OFOC) SOP  
Attachment 1: Justification for Limiting Sources \$3.5K up to \$150K

**FAR 8 - JUSTIFICATION FOR LIMITING SOURCES <\$150K**

**Acquisition Plan Action ID: VA255-16-AP-6111**

1. **Agency and Contracting Activity:** Department of Veterans Affairs, VISN 15, Harry S Truman VA Medical Center, Columbia, MO; Kansas City VA Medical Center, Kansas City, MO; and John J Cochran VA Medical Center, St. Louis, MO.

Harry S Truman VAMC (Columbia, MO)  
Kansas City VAMC (Kansas City, MO)  
John J Cochran VAMC ( St. Louis, MO)

**2. Description of Action:**

Nature: ☐ New Requirement ☒ Follow-on Order  
☐ Mod to Existing Order Number

Order against: ☒ FSS Contract Number: V797P-7322A

Name of Proposed Contractor: Abbott Laboratories  
Street Address: 200 Abbott Park Road, 850Q BLDG. AP52  
City, State, Zip: Abbott Park, IL 60064  
Phone: 800-323-9100

**3. Description of Supplies or Services:**

Action to be processed is the award of a bridge price order for Point of Care, Cost per Test, performance using Abbott I-Stat analyzers already in place at VISN 15 Laboratories, including Columbia, Kansas City and St. Louis, to provide testing coverage until a new BPA can be implemented. VISN 15 is requesting a 12 month extension. IGCE has been developed based on projected billing for new VISN 15 contract provided by vendor. Vendor will provide assistance with validation of new analyzers and operators for ACT testing.

The estimated value of the proposed action is \$112,724.00

Facility	Test	Cost per Test	Estimated Quantity 1 year	Total Cost
Columbia	ACT - K	\$7.46	2,200	\$16,412.00
Columbia	CRT	\$7.77	2,500	\$19,425.00
Kansas City	ACT-K	\$6.21	300	\$1,863.00
St. Louis	CG8+	\$16.60	2,600	\$43,160.00
St. Louis	CRT	\$11.38	2,800	\$31,864.00
<b>Totals</b>				<b>\$112,724.00</b>

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Quotes provided by Abbott on 11/7//16.

**Equipment & Service Requirements**

Item	List #	Quantity Columbia	Quantity Kansas City	Quantity St. Louis
I-Stat 1 Analyzer	04P75-01	8	0	11
I-Stat 1 Downloader/Recharger Network	06F56-46	5	0	9
I-Stat 1 Downloader Recharger Kit	04P73-04	3	0	2
I-Stat Electronic Stimulator	06F11-01	2	0	2
RALS Plus/Freedom Instrument Connection Fee	06F27-03	5	3	11
RALS Plus/Freedom Installation Fee	06F27-02	1	1	1
I-STAT 1 Analyzer Service	06F23-01	8	0	11
Existing RALS Rollover		1	1	1
<b>NOTES</b>		Leasing 8 analyzers with connectivity for 5. Will utilize 3 connections from separate RALS agreement	Owns 3 analyzers and requires connectivity for 3 analyzers	Leasing 11 analyzers

**Testing Volumes**

Facility	Test	Number of Anticipated Tests / Year
<b>Columbia</b>	Creatinine	2500
<b>Columbia</b>	Activated Clotting time-K	2200
<b>Kansas City</b>	Activated Clotting Time - K	300
<b>St. Louis</b>	CG8+	2600
<b>St. Louis</b>	Creatinine	2800

Vendor will provide the interface used to provide connectivity between the analyzers and VISTA at all participating VAMC's. This is currently being accomplished by use of RALS middleware solution with the data management software available via a virtual desktop access.

Vendor must supply the following documentation for all analyzers and data management systems provided to VISN 15:

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- MDS2 - Manufacturer Disclosure Statement for Medical Device Security.
- VA Directive 6550 Appendix A- Pre-Procurement Assessment
- ACL Connectivity Document
- MOU/ISA for Data Management systems that will require vendor access.

**4. Authority:**

**ORDER AGAINST FSS:** Authority of the Multiple Award Schedule Program, Title III of the Federal Property and Administrative Services Act of 1949 (41 USC 251, et seq.); Title 40 USC 501, Services for Executive Agencies; and Section 803 of the National Defense Authorization Act of 2002 (PL 107-107) and implemented by [FAR 8.405-6](#). Mark the applicable exception:

☒ An urgent and compelling need exists, and following the procedures would result in unacceptable delays([FAR 8.405-6\(a\)\(1\)\(i\)\(A\)](#));

☐ Only one source is capable of providing the supplies or services required at the level of quality required because the supplies or services are unique or highly specialized; ([FAR 8.405-6\(a\)\(1\)\(i\)\(B\)](#)) or

☐ In the interest of economy and efficiency, the new work is a logical follow-on to an original Federal Supply Schedule order and the original order was placed in accordance with the applicable Federal Supply Schedule ordering procedures. **The original order was not previously issued under sole-source or limited-sources procedures.** ([FAR 8.405-6\(a\)\(1\)\(i\)\(C\)](#))

**5. Rational/explanation to support cited authority:**

VISN 15 is currently in the process of submitting a contracting package for solicitation of a base year and 4 option year multiple vendor award for point of care testing. That package will have an expanded testing menu. Delays have been seen in getting the documentation from eight sites complied and also with getting 6500.6 signatures completed at the VISN level.

In order to provide quality patient care, testing will need to continue at the sites currently using CPT BPA VA255-13-A-0027. Without this testing, cardiac cauterization procedures cannot be performed at Columbia and Kansas City VA's using the Activated Clotting time test. The St. Louis VA's surgical services, including open heart procedures, will be affected by inability to perform current testing. Delays with Radiologic procedures will be seen at multiple sites using the creatinine testing. These delays would be detrimental to patient care.

Once an award is made on the new solicitation, implementation of additional tests or testing at new sites within VISN15 cannot occur prior to completion of CLIA required validation testing. After analyzers are received on station, the validation testing may take 1 to 1.5 months to complete. Training of nursing, radiology, cardiac cath RN's and emergency department RN's will need to occur. This process can take several weeks to a month to complete. Staff on all shifts and at CBOC's may need to be trained.

The VA Kansas City and Columbia do not have an additional source of in house testing for

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ACT testing during the time of the contract solicitation and implementation of the new agreement. Testing cannot be sent out due to the nature of the specimen and requirement to have immediate test results that allow for split second clinical care decisions. To avoid issues with patient care, VISN 15 is requesting the adaption of a bridge agreement.

6. BRAND NAME ONLY: This buy is estimated to exceed \$25,000 and this documentation will be posted along with the RFQ on e-Buy, as required by [FAR 8.405-6\(b\)\(3\)](#). NA
7. Note that this determination satisfies the requirements of [FAR 8.405-6](#). The requirement to prepare a written justification [IAW FAR 6.303](#) does not apply to Federal Supply Schedules.

Penny Capps  
Contracting Officer  
NCO 15  
November 29, 2016