

DEPARTMENT OF VETERANS AFFAIRS

Justification and Approval (J&A)

For

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

Acquisition Plan Action ID: VA251-16-AP-4218

1. **Contracting Activity:** Department of Veterans Affairs, VISN 10, Battle Creek VA Medical Center, 5500 Armstrong Road, Battle Creek, MI 49037.
2. **Nature and/or Description of the Action Being Processed:** FAR13.5 Simplified Procedures for Certain Commercial Items: This procurement is for a base plus four (4) option year firm fixed price contract for Readjustment Counseling Services located in the Big Rapids, MI catchment area in accordance with FAR 13.5 Simplified Procedures for Certain Commercial Items and specifically FAR 13.501 Special Documentation Requirements, where acquisitions conducted under Simplified Acquisition Procedures are exempt from the requirements of FAR Part 6, but still requires a justification using the format of FAR 6.303-2.
3. **Description of Supplies/Services Required to Meet the Agency's Needs:**
Contractor shall have relevant training in counseling for symptoms related to Post Traumatic Stress Disorder (PTSD), offer individual counseling to Veterans, as well as offer group counseling services. Veterans initially receive three (3) counseling sessions to complete an intake assessment and to complete a treatment plan specifying what the Veteran needs to enable them to readjust to civilian life. Counseling sessions will take place based on that assessment through the use of a limited licensed Psychologist, Licensed Mental Health Professional, and /or Licensed Social Worker (depending on Veteran's need). The base period of performance is April 1, 2017 through September 30, 2017 and the Independent Government Estimate for this base plus four (4) option year contract is \$1,154,192.59 (\$120,000.00 base year).
4. **Statutory Authority Permitting Other than Full and Open Competition:**
FAR 13.5 Simplified Procedures for Certain Commercial Items: The authority for applying the Simplified Procedures for Commercial Items of FAR 13.5 is 41 U.S.C. 1901 and is implemented by for restricting competition on this procurement via FAR 13.106-1(b)(2).

() (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;
(X) (8) FAR 13.5 in accordance with 41 USC 1901;

5. Demonstration that the Contractor's Unique Qualifications or Nature of the Acquisition Requires the Use of the Authority Cited Above (applicability of authority):

Riverview Counseling Wellness Center is the incumbent for these services. The Veterans receiving treatment for these services need to remain in Riverview Counseling Wellness Center psychologist care in order to maintain their continuity of care. The Veterans currently receiving counseling at Riverview Counseling Wellness Center trusts this provider and has established rapport with the Veterans that has helped gain successes in their treatment; a change in providers will be detrimental to their overall progress of readjusting to civilian life.

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

Market research was conducted and found that other providers in the area do not offer group counseling for the population served by the Vet Center Program, which is imperative to their mental health and wellbeing. Charges for the providers ranged from \$55 –120 per session.

In addition, a Request for Information (RFI) was sent to all vendors listed below and posted to www.fbo.gov under VA250-17-N-0022 for 10 days in which only the incumbent responded. Providers contacted were:

- 1) Riverview Counseling / Wellness Center (Incumbent)- Only provider to offer Individual and Group Counseling and response to RFI.
15495 Old Mill Pond Road
Big Rapids, MI 49307-9502
(231) 796-9188
- 2) Dr. Omar Mangrum
Human Resources Associates
128 N Warren Ave # B
Big Rapids, MI 49307
(231) 796-2522
- 3) Totten Psychological Services
211 Maple Street
Big Rapids, MI 49307
(231) 796-8881
- 4) Nova Counseling Associate
1724 N State Street
Big Rapids, MI 49307
(231) 796-4637

7. Determination by the Contracting Officer that the Anticipated Cost to the Government will be Fair and Reasonable: The Contracting Officer will ensure the prices being offered are fair and reasonable through use of reviewing past procurement history of these services (VA251-13-V-0046 awarded on 4/1/13 for \$499,710.00- base +2 option years), comparing the IGE, and the offerors quote.

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

Several providers in the area were contacted (see section 6) and none of them have the capability to offer Group Counseling services. Riverview Counseling is the only provider in the area that offers both Individual and Group Counseling services. Riverview Counseling is the only provider who has extensive experience in readjustment counseling of Veterans. An RFI was issued to the vendors listed above as well as posting to www.fbo.gov; VA250-17-N-0022 was posted on 10/18/16 for 10 days and returned one (1) response which was from the incumbent, Riverview Wellness and Counseling Center.

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

Veterans currently receiving services by Riverview Counseling must maintain their continuity of care in order to continue to achieve success in their ability to transition from military life to civilian life. The Veterans receiving services have a strong rapport with the counselors located at Riverview Counseling. The ability to trust the providers is essential to the Veteran feeling comfortable and safe enough to discuss their Post-Traumatic Stress from serving in the military. Rand Corporation conducted research and in article Improving Mental Health Care for Returning Veterans stated, "The mental health specialty workforce lacks sufficient training in evidence based practices." Moreover, the authors noted that "many are familiar with military culture or combat-related trauma disorder." (http://www.rand.org/content/dam/rand/pubs/research_briefs/2009/RAND_RB9451.pdf) Veterans who work with Riverview Counseling Psychology are given the expertise of five (5) providers with history of treating Veterans with issues related to PTSD, and also able to conduct group sessions multiple times per month. It has been proven that Veterans from all conflicts can have problems disclosing their combat trauma. These problems can be exacerbated if the veterans are required to change providers in the midst of disclosing their experiences and issues. The Vet Center Program services are specific to combat Veterans and their families.

Riverview Counseling Wellness Center is the only contractor able to offer Veterans the services that the Vet Center Program requires.

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

Riverview Counseling / Wellness Center
15495 Old Mill Pond Road
Big Rapids, MI 49307-9502
(231) 796-9188

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:

In the future, market research will be conducted to determine if there are any new providers in the area who have experience in the care of our Veterans with PTSD that offer both Individual and Group Counseling Sessions.

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.

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

Darryl P. Plunkett
243032

Digitally signed by Darryl P. Plunkett 243032
DN: dc=gov, dc=va, o=internal, ou=people,
0.9.2342.19200300.100.1.1=darryl.plunkett@va.gov,
cn=Darryl P. Plunkett 243032
Date: 2016.11.08 16:41:37 -05'00'

11/08/2016

Darryl P. Plunkett, PhD.
Team Leader
Grand Rapids Veterans Center

Date

13. **Approvals in accordance with the [VHAPM, Volume 6, Chapter VI: OFOC SOP](#).**

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

Lisa D.
Frymier
320908

Digitally signed by Lisa D. Frymier
320908
DN: dc=gov, dc=va, o=internal,
ou=people,
0.9.2342.19200300.100.1.1=lisa.fry
mier@va.gov, cn=Lisa D. Frymier
320908
Date: 2016.11.09 07:53:44 -05'00'

11/09/2016

Lisa Frymier
Contracting Officer
Network Contracting Office 10

Date

- b. **Branch Chief (Required if over \$150k)**: I certify the justification meets requirements for other than full and open competition.

Toni D.
Waggoner-Boykin
393105

Digitally signed by Toni D. Waggoner-Boykin
393105
DN: dc=gov, dc=va, o=internal, ou=people,
0.9.2342.19200300.100.1.1=toni.waggoner-
boykin@va.gov, cn=Toni D. Waggoner-
Boykin 393105
Date: 2016.11.17 16:26:41 -05'00'

11/17/2016

Toni D. Waggoner-Boykin
Branch Chief
Network Contracting Office 10

Date

- c. **Division Chief (Required if over \$700k)**: I certify that the foregoing justification is accurate and complete to the best of my knowledge and belief.

Monae D.
Heath 199291

Digitally signed by Monae D. Heath 199291
DN: dc=gov, dc=va, o=internal, ou=people,
0.9.2342.19200300.100.1.1=monae.heath@
va.gov, cn=Monae D. Heath 199291
Date: 2016.11.29 13:09:59 -05'00'

11/29/2016

Monae Heath
Division Chief, Healthcare and Services
Network Contracting Office 10

Date

- d. **Director of Contracting /Designee (Required if over \$700k)**: I certify the justification meets requirements for other than full and open competition.

TERRY L.
SPITZMILLER
394683

Digitally signed by TERRY L. SPITZMILLER
394683
DN: dc=gov, dc=va, o=internal, ou=people,
0.9.2342.19200300.100.1.1=terry.spitzmiller
@va.gov, cn=TERRY L. SPITZMILLER 394683
Date: 2016.12.09 09:01:20 -05'00'

12/09/2016

Terry L. Spitzmiller
Director of Contracting
Network Contracting Office 10

Date

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

- e. **VHA SAO 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 \$13.5 million) or approve (\$700K to 13.5 million) for other than full and open competition.

Linda S. Greaves
404790

Digitally signed by Linda S. Greaves 404790
DN: dc=gov, dc=va, o=internal, ou=people,
0.9.2342.19200300.100.1.1=linda.greaves@va.
gov, cn=Linda S. Greaves 404790
Date: 2016.12.15 17:37:55 -06'00'

Linda S. Greaves
Acting Director, SAO Central Region
SAO Central Head of Contracting (HCA)

12/15/2016

Date