

**LIMITED SOURCES JUSTIFICATION**

**ORDER >\$150,000**

**FAR PART 8.405-6**

**Acquisition Plan Action ID: 612-17-3-5713-0026 / VA261-17-AP-4109**

This acquisition is conducted under the authority of the Multiple Award Schedule Program. The material or service listed in par. 3 below is sole source, therefore, consideration of the number of contractors required by FAR Subpart 8.4 – Federal Supply Schedules, is precluded for the reasons indicated below.

**Restricted to the following source:** Provide *original manufacturer's* name for material or contractor's name for service. (If a sole source manufacturer distributes via dealers, *ALSO* provide dealer information.)

Manufacturer/Contractor: Sourcecorp Bps Inc. (Sourcecorp)

Manufacturer/Contractor POC & phone number: Andrea Bushnell, 408-436-1701 x-105

Mfgr/Contractor Address: 2701 E Grauwylar Rd, Irving, TX 75061-3414

Dealer/Rep address/phone number: Andrea Bushnell, andreabushnell@srcp.com, 408-436-1701 x-105

The requested material or service represents the minimum requirements of the Government.

**(1) AGENCY AND CONTRACTING ACTIVITY:**

Department of Veterans Affairs

Network Contracting Office (NCO)21

VA Northern California HealthCare System

150 Muir Road, Bldg: AB7; Rm: AB701

Martinez CA 94553-4668

**VISN: VISN 21**

**(2) NATURE AND/OR DESCRIPTION OF ACTION BEING APPROVED:**

This requirement is for Record Management Services to include records storage, retrieval, and disposition services.

**(3) (a) A DESCRIPTION OF THE SUPPLIES OR SERVICES REQUIRED TO MEET THE AGENCY'S NEED:**

The Northern California Veteran Affairs Healthcare System requires records storage, retrieval, and disposition services from a National Archives and Records Administration (NARA) approved Commercial Records Storage Facility. This facility must be and maintain all NARA standards in accordance with 36 CFR 1220 and 36 CFR 1234, as well as be in compliance with all other Federal Records and Privacy Acts.

**(b) ESTIMATED DOLLAR VALUE:** [REDACTED]

**(c) REQUIRED DELIVERY DATE:** 04/01/2017

**(4) IDENTIFICATION OF THE JUSTIFICATION RATIONALE (SEE FAR 8.405-6), AND IF APPLICABLE, A DEMONSTRATION OF THE PROPOSED CONTRACTOR'S UNIQUE QUALIFICATIONS TO PROVIDE THE REQUIRED SUPPLY OR SERVICE. (CHECK ALL THAT APPLY AND COMPLETE)**

Specific characteristics of the material or service that limit the availability to a sole source (unique features, function of the item, etc.). Describe in detail why only this suggested source can furnish the requirements to the exclusion of other sources.

Maintaining services with Sourcecorp is the most reasonable determination based on: 1) the legal requirements aforementioned within 36 CFR 1220 and 36 CFR 1234 for National Archives and Records Administration (NARA) approval of Commercial Records Storage Facilities for storage of Federal Agency Records, 2) the time required to search out, certify and submit vendors for NARA approval is not feasible to realistically procure the required services in a timely and efficient manner, 3) Sourcecorp currently stores approximately 10,000 sqft. of documents with the VA under the previous contract moving the records from the Sourcecorp facility to another NARA approved facility would cost an estimated \$12,000.00 excluding any shipping costs. 4) the Soucecorp CRSF location is less than 100 miles from the Records Pick-up points for the Northern California Veteran Affairs Healthcare System with the only in state other option for NARA approved storage is over 450 miles away (Iron Mountain, Redlands CA) which would require excessive travel costs for minor records retrievals tasks. This justification supports the authority to limit sources under FAR 8.405-6(a)(1)(i)(B)

---

---

A patent, copyright or proprietary data limits competition. The proprietary data is: \_\_\_\_\_  
(If FAR 8.405-6(a)(2)iii before posting. Do not include specific proprietary data. Only mention the type of equipment, procedure, etc. to show that proprietary supplies or services are being procured.)

---

---

---

---

These are "direct replacements" parts/components for existing equipment.

---

---

The material/service must be compatible in all aspects (form, fit and function) with existing systems presently installed/performing. Describe the equipment/function you have now and how the new item/service must coordinate, connect, or interface with the existing system.

---

---

---

---

The new work is a logical follow-on to an original Federal Supply Schedule order provided that the original order was placed in accordance with the applicable Federal Supply Schedule ordering procedures. The original order must not have been previously issued under sole source or limited source procedures.

---

---

---

---

---

An urgent and compelling need exists, and following the ordering procedures would result in unacceptable delays.

---

---

---

---

---

---

---

---

**(5) DESCRIBE WHY YOU BELIEVE THE ORDER REPRESENTS THE BEST VALUE CONSISTENT WITH FAR 8.4 TO AID THE CONTRACTING OFFICER IN MAKING THIS BEST VALUE DETERMINATION:**

Pricing is similar to previous prices in this location with the previous FY 12 contract VA261-12-F-1057 which was awarded at \$1,033,639.85 annually, and a total of \$4,134,559.40 for a base year plus 3 option years contract. Additionally, this contract is based on pre-published price list in accordance with the GSA Contract GS-25F-0054L.

---

---

---

---

---

---

---

---

**(6) DESCRIBE THE MARKET RESEARCH CONDUCTED AMONG SCHEDULE HOLDERS AND THE RESULTS OR A STATEMENT OF THE REASON MARKET RESEARCH WAS NOT CONDUCTED:**

The VA patient medical records are required to be stored at a NARA certified facility in compliance with 36 CFR 1234. Only National Archives and Records Administration (NARA) approved Commercial Records Storage Facilities (CRSF) can legally store Federal Agency Records, NARA produces a list of current NARA approved facilities and as these facilities become approved they are added to this list (see attached email from NARA POC). There are no small businesses available on the NARA approved CRSF list. NARA approved CRSFs must provide records storage, retrieval, and disposition services to be considered a CRSF in accordance with 36 CFR 1220. Additionally, in accordance with 36 CFR 1220 General Services Administration (GSA) is responsible for overseeing economy and efficiency in records management. The Archivist of the United States and the Administrator of GSA issue regulations and provide guidance and assistance to Federal agencies on records management programs. SourceCorp is currently listed as NARA approved and has a GSA established contract Sourcecorp to provide Records Management Services as a CRSF. While there are many companies listed under the GSA 51 504 Records Management GSA clearly states that, "The National Archives and Records Administration (NARA) issued standards in 36 CFR 1228 Subpart K pertaining to facilities that store Federal records. The numbering for the

standards was changed in November 2009 to 36 CFR 1234, but references to the old numbering (36 CFR 1228 subpart K) still appear. Federal agencies must certify to NARA that a facility meets the 36 CFR 1234 standards before Federal records are placed in a records storage facility or, if not already approved by NARA, for those facilities where they are already storing their records. Vendors have the option to become NARA approved through the GSA contract process, this process according to NARA's Guidance on Records Storage Facility Required Actions requires a minimum of 45 days for review however may take longer based on the amount of inquires that may be required dependent of the state of the vendors facilities and inquiry responses. Therefore, the process could potentially take up to 3 months to clear a facility to be NARA approved. It is not feasible that this agency utilized scarce resources to travel to various vendors to conduct the NARA inspections to "potentially" be a NARA approved vendor. This has been the responsibility of GSA based on 36 CFR 1220 which is why GSA contracted CRSFs have been utilized. The time required to search out, certify and submit vendors for NARA approval is not feasible to realistically procure the required services in a timely and efficient manner. Currently under contract VA261-12-F-1057 Sourcecorp stores and maintains approximately 10,000 sqft. of documents for the Northern California Veteran Affairs Healthcare System. The VA has received an estimate from the vendor for approximate cost to transfer documents to another facility in the amount of approximately \$12,000.00 excluding shipping costs. The location of the current Sourcesorp storage facility is in San Jose, CA which is less than 100 miles from the furthest records pickup point. The next nearest NARA approved storage site is the Iron Mountain facility located in Redlands CA which is over 450 miles away. Traveling to this site would require overnight travel for VA personnel or excessive costs contractually. The results of this market research suggest maintaining services with Sourcecorp is the most reasonable determination based on the information available.

---

**(7) ANY OTHER FACTS SUPPORTING THE JUSTIFICATION:**

---

**(8) A STATEMENT OF THE ACTIONS, IF ANY, THE AGENCY MAY TAKE TO REMOVE OR OVERCOME ANY BARRIERS THAT LED TO THE RESTRICTED CONSIDERATION BEFORE ANY SUBSEQUENT ACQUISITION FOR THE SUPPLIES OR SERVICES IS MADE:**

The VA will continue to monitor the Federal Record keeping laws and regulations as well as the NARA process and approved list of Commercial Records Storage Facilities (CRSF)s for updates and changes.

---

**(9) 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. I understand that processing of this limited sources justification restricts consideration of Federal Supply Schedule contractors to fewer than the number required by FAR Subpart 8.4. *(This signature is the requestor's supervisor, fund control point official, chief of service or someone with responsibility and accountability.)*

---

SIGNATURE

---

DATE

Chapter VI: Other Than Full and Open Competition (OFOC) SOP  
Attachment 2: Request for Limited Sources Justification Format >\$150K

\_\_\_\_\_  
NAME TITLE SERVICE LINE/SECTION

\_\_\_\_\_  
FACILITY

**(10) 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.

\_\_\_\_\_  
CONTRACTING OFFICER/DESIGNEE'S SIGNATURE DATE

Jason T. Hill  
NAME AND TITLE NCO 21  
FACILITY

**b. Director of Contracting/DESIGNEE:** I certify that the foregoing justification is accurate and complete to the best of my knowledge and belief.

\_\_\_\_\_  
SIGNATURE DATE

\_\_\_\_\_  
NAME  
NCO 21 Director of Contracting / Designee