

DEPARTMENT OF VETERANS AFFAIRS

Justification and Approval

For

Other Than Full and Open Competition

1. Contracting Organization:

Department of Veteran Affairs, VISN 18, Phoenix VA Healthcare System

2. Description of Action:

This is a request for other than full and open competition for the procurement of Gastroenterology Physician services for the Amarillo VA Healthcare System in Amarillo, Texas.

Contractor Name: Amit Trehan
Address: 6833 Plum Creek Drive
Phone: 806-467-9820
DUNS: 147893015

It is imperative that adequate staffing coverage be available in order to provide Gastroenterology services to Amarillo VA Healthcare System (AVAHCS) veterans. These services are currently being provided by three physicians; one staff provider and two fee service physicians. The two fee service physicians will soon be reaching their maximum allowable earned income for the year through the fee service program and will no longer be able to see patients until next year. The staff provider will be resigning effective July 27, 2012. This will leave AVAHCS without any providers for veterans needing Gastroenterology services. It is essential that AVAHCS hire at least two physicians to maintain the current workload. Therefore, a short term contract must be put into place to ensure sufficient coverage until such time a long term contract can be solicited and awarded using competitive procedures.

3. Description of Supplies and Services:

The Amarillo VA Healthcare System, located in Amarillo, Texas is seeking a contract for two Gastroenterologist physicians to conduct outpatient clinics, perform procedures, perform consults, and on-call services. On-call services are required 24 hours per day, 7 days per week, and 365 days per year. A portion of the time is to be spent with inpatients and answering inpatient consults from staff hospitalists. Services under this contract are required 52 weeks out of the year. Computer skills are required as the medical records are computerized and all imaging is digital.

4. Statutory Authority:

The agreement shall be issued under the authority of 41 U.S.C. 253 (c) (1) permitting other than full and open competition, and per FAR Subpart 6.3, paragraph 6.302-2, Unusual and Compelling Urgency.

The Amarillo VA Health Care System (AVAHCS) can expect conditions that may be life threatening to Veteran patients needing Gastroenterology Services if the physicians are not acquired in a timely manner.

5. Reason for Authority Cited:

It is essential to maintain adequate staffing to provide Gastroenterology services to AVAHCs veterans. Currently this is being accomplished by three physicians, one staff provider and two fee service physicians. The two fee service physicians will soon be reaching their maximum allowable earned income for the year through the fee service program. The staff provider will be resigning effective July 27, 2012. This will leave AVAHCs without any providers of Gastroenterology services. It is imperative to hire at least two physicians to maintain the workload of the previous three. Therefore, a short term contract must be put into place to ensure sufficient coverage until such time a long term contract can be solicited and awarded using competitive procedures. A long-term contract is being worked concurrently with a projected award date of approximately August 31, 2012. The AVAHCs can expect conditions that may be life threatening to Veterans needing Gastroenterology Services if the physicians are not acquired in a timely manner.

6. Determination of Fair and Reasonable Price:

The total anticipated price to the Government is \$465,000.00; two physicians at \$232,500 each. Price reasonableness can be established for this procurement based on comparison with other firms/facilities providing similar services. Comparison can also be made using market research.

Salary.com lists a full-time Gastroenterologist physician salary range as \$363,811-\$529,980
Locum-Tenens.com lists Locum Physicians with a mean hourly wage of \$293 per hour.

7. Other Considerations:

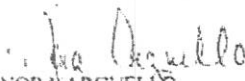
The health and welfare of patients at AVAHCs necessitates awarding a contract for this service as expeditiously as possible. A formal notice publicizing the intent to sole source is not required in accordance with VAAR 873.108(h).

8. Statement of Actions to overcome barriers to competition:

The barrier in this specific situation is time. A six month, short-term contract will allow for the solicitation and award of a long term contract using competitive procedures. This is a temporary solution while a long-term competitive solution is sought.

9. Requirements Certification:


I certify that the requirement outlined in this justification is a bonafide need of the Department of Veterans Affairs and that the supporting data, which are included in the justification, are accurate and complete to the best of my knowledge and belief.


NORA ARGUELLO
AO Medical Service

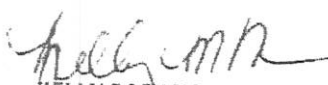
Date: 5/23/12

10. Approvals in accordance with FAR 6.304

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



MARY MICHELE WHITLOCK
Contracting Specialist

5/23/12
Date: 5/23/12


KELLY DODSON
Contracting Officer

5/24/2012
Date: 5/23/12

- b. VISN/PCA QA (Required S3K and above): I certify that the foregoing justification is accurate and complete to the best of my knowledge and belief.


VISN/PCA COMPLIANCE REPRESENTATIVE
PAULETTE PERERIA
Compliance Analyst
VISN 18 QA

REVIEWED
By: [Signature] Date: 5/23/12

Date

QA Notes: Authority cited is based on the fact that failure to provide the required two GI physicians would be life threatening to veteran patients at AVAHCs and would not meet the VA mission of providing exceptional and quality health care

- c. NCM/PCM (Required S3K and above): I certify that the foregoing justification meets requirements for other than full and open competition.


Sabrina Smith
Network Contract Manager
V18 NCO-SAO WEST
SABRINA J. SMITH
Network Contract Manager
VISN/PCA 18

Date

5/28/2012