

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

Acquisition Plan Action ID: 763-18-1-021-0044

1. **Agency and Contracting Activity:** Department of Veterans Affairs, VISN 15,Lancaster TX CMOP

2. **Description of Action:**

Nature: ☒ New Requirement ☐ Follow-on Order
☐ Mod to Existing Order Number Insert task/delivery order no.

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

- A. SET,INFUSION MINIMED #MMT-378
- B. RESERVOIR,MINIMED #MMT-332A
- C. SET,INFUSION INSET 30 ANIMAS #396-00
- D. SET,INFUSION ANIMAS #006-01
- E. SET,INFUSION ANIMAS #182-00

4. **Authority:** Brand specific med-surg items are requested by Doctors and Physicians at the VAMC served by Dallas VA CMOP

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:

Products have been prescribed for patients by a VA Physicians. Pharmacy employees do not have the training and/or authority to countermand physician orders. “Brand Specific” products are the same thing as “dispense as written” on a physician prescription. No NDC substitutions are permitted. In the VA, Pharmacy Benefits Management (PBM) has determined that CMOP IDs in the National Drug File (NDF) will most always identify “brand specific” products in the VA PRINT NAME. This is not always inclusive where a particular NDC has been determined to be “formulation specific” by clinical evaluation performed by the PBM or in the case where only one product in the marketplace has been identified to contain the specific ingredients to match the product code.

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\(b\)\(3\)](#).
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.

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