

DEPARTMENT OF VETERANS AFFAIRS

**Justification and Approval (J&A)
For
Other Than Full and Open Competition (>\$150K)**

Acquisition Plan Action ID: 518-18-1-425-0003

1. **Contracting Activity:** Department of Veterans Affairs, VISN 1, Edith Nourse Rogers VA Medical Center (ENRM VAMC) in Bedford, MA requests to purchase Walmart gift cards through the purchase request # 518-18-1-425-0003. For the Office of Patient Centered Care and Cultural Transformation (OPCC&CT) funded grant “Evaluating VA Patient-Centered Care: Patient, Provider and Organizational Views” (PEC 13-001), we are requesting 31,500 gift cards at the value of \$5.00 each. With this purchase request number, we are requesting to buy these gift cards from Walmart in order to compensate participants for our approved operations evaluation protocols. This is a sole source justification rather than full or open compensation.
2. **Nature and/or Description of the Action Being Processed:** The action of buying gift cards in order to compensate veteran participants for their time in completing our evaluation survey has been approved through our grant “Evaluating VA Patient-Centered Care: Patient, Provider and Organizational Views” (PEC 13-001). Both the VA’s Central Institutional Review Board (IRB) and the ENRM Bedford local site IRB have determined this to be an evaluation of a VA program for quality assurance purposes and not research as defined by 38 CFR 16.102 (d) and VHA Handbook 1200.05. This will be awarded as a new contract as identified by the purchase request # 518-18-1-425-0003 . This is a materials contract where we are requesting 31,500 Walmart gift cards worth \$5.00 each for a total of \$157,500 for this study.

The total for materials included in this request is \$157,500.

3. **Description of Supplies/Services Required to Meet the Agency’s Needs:** For the grant “Evaluating VA Patient-Centered Care: Patient, Provider and Organizational Views” (PEC 13-001), we are approved to pay veteran participants using \$5.00 Walmart gift cards as compensation for their time for the completion of a survey. Through the purchase request # 518-18-1-425-0003, we are requesting 31,500 Walmart gift cards worth \$5.00 each for a total of \$157,500. The cards will be shipped directly from Wal-Mart Stores Inc. headquarters in Bentonville, AR to the ENRM VAMC in Bedford, MA. Estimated delivery date of these gift cards is 1/5/2018.
4. **Statutory Authority Permitting Other than Full and Open Competition:**
 - (x) (1) Only One Responsible Source and No Other Supplies or Services Will Satisfy Agency Requirements per FAR 6.302-1;
 - (x) (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;

5. **Demonstration that the Contractor's Unique Qualifications or Nature of the Acquisition Requires the Use of the Authority Cited Above (applicability of authority):** FAR 6.302-1 and FAR 6.302-2 apply to this purchase request # 518-18-1-425-0003. For "Evaluating VA Patient-Centered Care: Patient, Provider and Organizational Views" (PCE 13-001), according to FAR 6.302-1, we chose Walmart as the vendor for our gift cards, because they are a national vendor that is easily accessible to our eighteen hospital survey sites (1. Boston, MA; 2. East Orange, New Jersey ; 3. Erie, PA; 4. Beckley, WV; 5. Salisbury, NC; 6. Atlanta, GA; 7. Tampa, FL; 8. Tennessee Valley, TN; 9. Saginaw, MI; 10. Tomah, WV; 11. St. Louis, MO; 12. Little Rock, AR; 13. Houston, TX; 14. Salt Lake City, NV; 15. Portland, WA; 16. Palo Alto, CA; 17. Tucson, AZ; and 18. Omaha, NE.) Walmart has been a major system that we have used for past research studies to provide payments to participants with high success. This vendor is the only one we found that is accessible and local to veterans at every site and it is located throughout the US, should the veterans decide to use it at other sites across the US. Veterans who lack a mode of transportation could easily walk or take public transportation a short distance to several Walmart stores within a small radius of the eighteen hospital sites where we are planning to recruit for the "Evaluating VA Patient-Centered Care: Patient, Provider and Organizational Views" evaluation. These cards can also be used online, for veterans who are immobile or would rather complete their shopping online.

According to FAR 6.302-2, we have a compelling urgency to procure gift cards through Walmart for our evaluation, because we are approved to do so through our grant. We also are planning to administer surveys for this evaluation starting immediately after we receive the gift cards for each site. Because the gift cards will accompany the administered surveys, we cannot move forward with this evaluation task until we have received the gift cards.

6. **Description of Efforts Made to ensure that offers are solicited from as many potential sources as deemed practicable:** A sources sought synopsis was not made; however, we did consider other vendors to pay participants using gift cards. Other stores we considered include CVS and Target. We used the "store locator" function on the corporate websites for each potential vendor and determined that Walmart is the only widely-used retail store that is both approved as a vendor and easily accessible to veteran patients at all of the 18 hospital sites where we are administering surveys for "Evaluating VA Patient-Centered Care: Patient, Provider and Organizational Views." Survey participants need to have reasonable access, within a limited geographical radius, to the store if the gift card is to be of value to them.
7. **Determination by the Contracting Officer that the Anticipated Cost to the Government will be Fair and Reasonable:** The fixed price of \$137,500 was based on the number of gift cards needed at each value. The contracting officer anticipates that this cost to the Government is fair and reasonable.
8. **Description of the Market Research Conducted and the Results, or a Statement of the Reasons Market Research Was Not Conducted:** Beyond the extensive review of gift card vendor options described in #6 above, no market research was conducted.
9. **Any Other Facts Supporting the Use of Other than Full and Open Competition:** Not applicable.
10. **Listing of Sources that Expressed, in Writing, an Interest in the Acquisition:** See Section #6 above

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: At this time, subsequent acquisitions for supplies are not planned for this grant.

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.



12/8/2017

Anna Maria Valentine
Title: Administrative Officer
Facility: CHOIR, ENRM VAMC

Date

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

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

Name- Linda Ward
Title – Supervisory Contracting Officer
Facility – NCO1 Manchester

Date

b. **Director of Contracting /Designee (Required \$150K and above):** I certify the justification meets requirements for other than full and open competition.

Name
NCO/PCO XX Director of Contracting or Designee
Facility

Date