

DEPARTMENT OF VETERANS AFFAIRS

FAR 8 – Justification for Limiting Sources (LSJ)

For  
Limiting Sources

Acquisition Plan Action ID: [REDACTED]

1. **Contracting Activity:** Department of Veterans Affairs, VISN 06, Hampton VA Medical Center, 100 Emancipation Drive, Hampton, VA 23667. Purchase request number [REDACTED].
2. **Description of Action:** This is a Brand Name Only requirement for the acquisition of additional Omnicell Flexlock devices for Richmond VAMC.

Order against: ☒ FSS Contract Number: V797P-30111

Name of Proposed Contractor: Omnicell, Inc.  
Street Address: 590 E. Middlefield Rd.  
City, State, Zip: Mountain View, CA 94043  
Phone: (650)251-6100

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

The estimated value of the proposed action is [REDACTED]

The requiring activity is currently in need of additional Flexlock devices required for locking medication refrigerators and linking them to the nearby Omnicell automated dispensing cabinet for medication at the Richmond VAMC.

4. **Authority:**

**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));

☐ 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)); or**

☐ **Items peculiar to one manufacturer.** An item peculiar to one manufacturer can be a particular brand name, product, or a feature of a product, peculiar to one manufacturer). A brand name item, whether available on one or more schedule contracts, is an item peculiar to one manufacturer (FAR 8.405-6(b)).

**5. Rational/explanation to support cited authority:**

The Richmond VAMC had previously standardized upon the Omni-cell platform. This requirement is to provide additional equipment to the existing Omnicell cabinets and refrigerators. Linking the medication cabinet and medication refrigerators improves medication distribution and medication security. The Flexlocks must be from Omnicell as the facility's automated dispensing cabinets are also from Omnicell. These locks will seamlessly integrate into the existing Omnicell infrastructure in place at the Richmond VAMC. This is in support of the initiative that was employed to restore Controlled Substance Pharmacy Stock compliance at the Richmond VA Medical Center conforming to the perpetual electronic inventory of all controlled substances as outlined in the VHA Handbook 1108.01. The procurement of any other device would undermine the previous standardization effort executed to comply with the SOP established for Safe Patient Handling resulting in additional costs not expected to be recovered through competition. Before any other equipment can be utilized by the facility, an SOP would have to be developed, approved, implemented and medical center staff would be required to be trained on the new equipment resulting in unacceptable delays in fulfilling the agency's requirement.

Omni-cell has asserted that due to its distributorship terms they are unable to fit any resellers into their business model and therefore no third-party distributorships exist. Accordingly, Omni-cell has affirmed their status as a commercially available Sole Source vendor and have provided a letter to that effect.

6. 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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