

**LIMITED SOURCES JUSTIFICATION**

**ORDER >SAT**

**FAR PART 8.405-6**

**Acquisition Plan Action ID:** 36C263-18-AP-1765

- 1. Contracting Activity:** Department of Veterans Affairs, NCO 23, St. Cloud VA Health Care System, 4801 Veterans Drive, MN 56303. Organization Activity: Minneapolis VA Health Care System (MVAHCS), One Veterans Drive Minneapolis, MN 55417, 618-18-4-040-0362.
- 2. Description of Action:** This acquisition is conducted under the authority of the Multiple-Award Schedule Program ([41 U.S.C. 251](#) and [40 U.S.C. 501](#)).

Firm fixed price sole source delivery order for virtual reality surgical simulation trainer equipment (Simbionix LapMentors, a SpineMentor and a ArthroMentor hip module) for the Minneapolis VA Health Care System from Simbionix USA Corp through their GSA schedule.

Order against: ☒ FSS Contract Number: GS-02F-0049W

Name of Proposed Contractor: Simbionix USA Corp  
Street Address: 5381 Alkire Cir  
City, State, Zip: Littleton, CO 80127  
Phone: 216-401-6414

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

This procurement is for Simbionix virtual reality surgical simulation trainer equipment to support the VISN 23 Simulation program. VISN 23 is replacing seven of their 20 existing trainers and purchasing an additional trainer and an additional software module. VISN 23 is replacing their 7 LapMentor I trainers with LapMentor III trainers to include installation and loading active software modules from old trainers to the new ones. A Hip software module for the Minneapolis VA's ArthroMentor Virtual Reality Arthroscopic Surgical Trainer will expand upon their current knee and shoulder modules allowing Ortho surgeon training on all three procedures. The Minneapolis VA also requires a SpineMentor virtual reality simulation trainer for fluoroscopy spinal medication injection training for the treatment of pain by the Pain Clinic.

The estimated value of the proposed action is [REDACTED]

Period of Performance: 90 days ARO

**(4) IDENTIFY THE AUTHORITY AND SUPPORTING RATIONALE (see [8.405-6\(a\)\(1\)\(i\)\(A\)](#), [\(B\)](#), and [\(C\)](#) or [8.405-6\(b\)](#)), AND IF APPLICABLE, A DEMONSTRATION OF THE PROPOSED CONTRACTOR'S UNIQUE QUALIFICATIONS TO PROVIDE THE REQUIRED SUPPLY OR SERVICE.**

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

☒ 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;

The Minneapolis VA requires a SpineMentor trainer for expanded training capabilities as part of the VISN 23 simulation program. The Symbionix SpineMentor trainer is the only virtual reality trainer that provides fluoroscopic guided injection training. The SpineMentor offers palpable materials for realistic feeling, virtual reality capabilities for performance metrics and virtual fluoroscopy for training on image guided interventions in a safe environment with no radiation. It enables practicing transplanting of electrodes/leads along the spine, which is a unique feature. Symbionix trainers are also compatible with the MentorLearn web based simulator curricula management system utilized by 2 of the current Symbionix trainers and potentially needed by others in the future. The manufacture Symbionix USA Corp, a large business, was contacted and they provided verification that these items are only available directly from them. There are no authorized distributors. They also provided verification that the main components required by VISN 23 are available through their GSA contract, GS-02F-0049W.

☐ In the interest of economy and efficiency, 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.

☒ Items peculiar to one manufacturer:

☐ 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.

Symbionix LapMentor trainers are required as VISN 23 is replacing their 7 original trainers and these new trainers need to be compatible with and utilize the same software training modules currently purchased and used in VISN 23. The Minneapolis VA already owns a ArthroMentor Virtual Reality Arthroscopic Surgical Trainer with the knee

and shoulder software modules. They now require a Hip software module to allow for expanded training. Only the Simbionix Hip module is compatible with their current ArthroMentor trainer. No other manufactures trainers or software are compatible with the existing VISN 23 Simbionix virtual reality trainer systems and these items are required for additional training capability.

**(5) DESCRIBE WHY YOU BELIEVE THE ORDER REPRESENTS THE BEST VALUE CONSISTENT WITH FAR 8.404(d) TO AID THE CONTRACTING OFFICER IN MAKING THIS BEST VALUE**

**DETERMINATION:** The main components for this procurement are available through Simbionix USA Corp's GSA contract, the remaining items will be compared against their list price and additional discounts will be requested.

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

VetBiz was searched under NAICS code 339112 which returned 319 results. The manufacture Simbionix USA Corp, a large business, was contacted and they provided verification that these items are only available directly from them. There are no authorized distributors. They also provided verification that the main components are available through their GSA contract, GS-02F-0049W.

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

**(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:**

For future trainer requirements market research will be conducted to determine if there are other vendors that can provide compatible equipment allowing for competition.

**(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.)*



**(10) APPROVALS IN ACCORDANCE WITH THE [VHAPM Part 806.3 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.

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**b. One Level Above the Contracting Officer (Required over the SAT but not exceeding \$700K):** I certify the justification meets requirements for other than full and open competition.

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