

Department of Veterans Affairs
Justification and Approval
For
Other Than Full and Open Competition
Other Than Full and Open Competition (>SAT)

1. **Contracting Activity:** The Contracting Activity responsible for this procurement is the Department of Veterans Affairs (VA), Office of Procurement Acquisition and Logistics (OPAL), Strategic Acquisition Center –Frederick (SAC-F), located at 321 Ballenger Center Drive, Suite 125, Frederick, MD 21703.
2. **Nature and/or Description of the Action Being Processed:** The Agency requires a firm-fixed price Blanket Purchase Agreement (BPA) for use by all VA Medical Centers in procuring yearly membership to the Council of Teaching Hospitals and Health Systems (COTH) through the Association of American Medical Colleges (AAMC). The ordering period for this firm-fixed price BPA will be 60-months from the date of award.
3. **Description of Supplies/Services Required to Meet the Agency’s Needs:** Membership in COTH is required by 48 VA medical facilities and 19 Veterans Integrated Service Networks (VISN).
4. **Statutory Authority Permitting Other than Full and Open Competition:** Pursuant to Federal Acquisition Regulation (FAR) 13.501(2)(ii), for a proposed contract exceeding [REDACTED] but not exceeding [REDACTED] the advocate for competition for the procuring activity, designated pursuant to FAR 6.501; or an official described in FAR 6.304(a)(3) or (a)(4) must approve the justification and approval. This authority is not delegable.
5. **Validity of Use of Statutory Authority:**
Only One Responsible Source and No Other Supplies or Services Will Satisfy Agency Requirement – the services requested are “highly specialized.”
AAMC and the American Medical Association (AMA) jointly sponsor the Liaison Committee on Medical Education (LCME), the U.S. Department of Education’s only recognized accrediting body for programs leading to M.D. degrees. As outlined in Veterans Health Administration (VHA) Handbook 1400.03, there is an affiliation agreement between VHA and LCME. COTH membership through AAMC provides the VHA with the tools necessary to maintain the accreditation of VA’s 64 teaching hospitals and interact with AAMC’s 151 accredited U.S. and 17 accredited Canadian medical schools; nearly 400 major teaching hospitals and health systems and more than 80 academic societies.

COTH enables VA to help direct the future of medical education by enabling VA to name facility representatives to various professional development groups, such as the following:

- Group on Resident Affairs, which provides information and professional development programs to help members meet their responsibilities as Graduate Medical Education (GME) leaders at the institutional level in the AAMC member medical schools, hospitals, and academic societies.

- Groups on Business Affairs that focus on financial management.
- Institutional planning that focus on strategic planning for research and infrastructure.
- Educational Affairs that focus on undergraduate, graduate, and continuing education from the program perspective.

Membership to COTH provides VHA with the tools specific to VA's affiliations with LCME and teaching hospitals Nationwide. Specifically, COTH provides the following tools:

- **ADVISOR INFORMATION SYSTEM (AIS):** The AIS is an online reporting tool providing advisors with AMCAS application and MCAT data about their advisees.
- **CAREER CONNECT:** Free job seekers, CareerConnect provides access to the best employers and jobs at medical schools and teaching hospitals.
- **Careers in Medicine® (CiM):** Wondering how to choose a specialty and select and apply to a residency program to meet your career objectives? Careers in Medicine® guides you through the process of career assessment, exploration, and decision-making.
- **CurrMIT (Curriculum Management & Information Tool):** CurrMIT is a password-protected, online database that offers a full array of support services designed to help medical schools manage and report on the curriculum.
- **Electronic Residency Application Service (ERAS®):** ERAS transmits a standardized application, letters of recommendation, the Medical Student Performance Evaluation (MSPE), transcripts, and other supporting credentials from applicants and designated dean's offices to program directors.
- **Faculty Forward:** Faculty Forward is a collaborative partnership among the AAMC, medical schools, and teaching hospitals to make academic medical centers great places to work.
- **FindAResident®:** A powerful, Web-based search tool to help you find open residency and fellowship positions.
- **GME Track®:** GME Track® is a resident database and tracking system that assists GME administrators and program directors in the collection and management of GME data.
- **Identity Verification Service:** The AAMC's Identity Verification Service allows registered users at each U.S. Medical school to verify the identity of matriculates using data collected at the Medical College Admission Test® (MCAT®).
- **Liaison Committee on Medical Education (LCME):** The AAMC and the American Medical Association are cosponsors of the LCME, the national accrediting body for M.D. degree programs in U.S. and Canadian medical schools.

- **MedEdPORTAL®:** A free online database that facilitates sharing of peer-reviewed educational material.
- **Student Records System (SRS):** The SRS is a secure online application that contains a record for every student currently enrolled in an LCME-accredited U.S. allopathic medical school.
- **Visiting Student Application Service (VSAS®):** The Visiting Student Application Service (VSAS®) is an AAMC application designed to make it easier for medical students to apply for senior electives at U.S. LCME medical schools and independent academic medical centers.

Other benefits of COTH membership include the following:

- Legislative and regulatory monitoring of federal health issues impacting hospital and physician payment, biomedical research, technology, medical education, and the physician workforce.
- Access to information and conferences on healthcare workforce planning issues and research.
- Access to password protected, online databases and comparative reports (e.g., annual faculty salary data, resident salary data, medical student enrollment data, etc.), which allows comparisons of VA Teaching Hospitals against the private sector.
- Subscriptions to Academic Medicine, and AAMC Reporter, including online access to these and other publications, which are highly relevant to the Department of Veterans Affairs education mission.

The Government researched other medical associations to determine whether similar benefits could be obtained elsewhere. The search revealed the following:

- [American Association of Healthcare Administrative Management \(AAHAM\)](#)
- [American College of Healthcare Executives \(ACHE\)](#)
- [American Health and Information Management Association \(AHIMA\)](#)
- [Healthcare Administrators Association \(HCAA\)](#)
- [The Healthcare Financial Management Association \(HFMA\)](#)
- [The National Association of Healthcare Access Management \(NAHAM\)](#)

A review of the benefits provided by each of the associations listed above revealed that each association offers networking opportunities, newsletters, certifications, training resources and conferences, but none are directed towards the unique needs of Teaching Hospitals. AAMC is the only organization that represents all U.S. medical schools and teaching hospitals. Furthermore, only COTH provides the specific tools and services required by 64 VA Teaching Hospitals and their VISNs.

6. **Description of Efforts Made to ensure that offers are solicited from as many potential sources as deemed practicable:** In accordance with FAR 5.203(a), the Government will publish a Notice of Intent to Sole Source to www.FedBizOps.gov 15 days prior to entering into an award for these services.
7. **Determination by the Contracting Officer that the Anticipated Cost to the Government will be Fair and Reasonable:** The total dollar value of the proposed acquisition is [REDACTED]. There is adequate price history for analysis. The Contracting Officer determines that the anticipated price will be fair and reasonable based on historic cost analysis and examination of the current and future needs of the VA. The anticipated price to the Government for membership covering the period October 1, 2018 through September 30, 2023, is [REDACTED]. Price is determined reasonable by the contracting officer based on historical pricing paid by VA and other Government Agencies. Furthermore, AAMC will be providing VA with a [REDACTED] discount on membership throughout the 60-month period of performance.
8. **Description of the Market Research Conducted and the Results, or a Statement of the Reasons Market Research Was Not Conducted:** FAR Part 10 directs that market research be conducted on each acquisition appropriate to the circumstances. There are limited competitive opportunities available for resources related to academic medicine, faculty training and administrative professional development as it pertains to academic medicine and affiliation relationships.

The Government reviewed the Office of Small & Disadvantaged Business Utilization's (OSDBU) Vendor Information Pages (VIP). Searches were conducted using NAICS Code 813920, plus keywords AAMC, COTH, Teaching, and Council. These searches displayed zero results. Based on the information obtained from VIP, the Government did not identify any potential Service-Disabled Veteran-Owned Small Business (SDVOSB) or Veteran-Owned Small Business (VOSB) sources capable of providing the required membership.

The Government searched the Procurement List maintained by the Committee for Purchase From People Who Are Blind or Severely Disabled (AbilityOne) and found that AbilityOne does provide the required membership.

The Government searched the Small Businesses Administration's (SBA) Dynamic Small Business Search (DSBS) tool. Searches were conducted using NAICS Code 813920 plus keywords AAMC, COTH, Teaching, and Council. These searches displayed zero results. Based on the information obtained from VIP, the Government did not identify any potential small businesses that are capable of providing the required membership.

The Government conducted a search on General Services Administration (GSA) e-Library and determined that the required membership is not available from the Federal Supply Schedule. The Government searched the Open Market for sources capable of providing membership to COTH, which resulted in a single source, The Association of American Medical Colleges.

The Government reviewed Market Research that was conducted by Lyn Williams, a Contracting Officer in NCO 20, which concluded that COTH AAMC was the only source for the required membership and no similar sources.

13. Approvals in accordance with FAR 13.501(2)(ii):

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

[REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED]
SAC -F

- b. **One Level Above the Contracting Officer:** I certify that the foregoing justification is accurate and complete to the best of my knowledge and belief.

[REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED]
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- c. **Advocate for Competition:** I have reviewed the foregoing justification and find it to be complete and accurate to the best of my knowledge and belief and approve for other than full and open competition

[REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED]