

**DEPARTMENT OF VETERANS AFFAIRS**

**Justification and Approval**

**For**

**Other Than Full and Open Competition**

**VA INSTITUTIONAL REVIEW BOARD NUMBER: RR0054**

1. **Contracting Activity:** Department of Veterans Affairs  
Network Contracting Office 1 (NCO 1 – New England)  
650/90C
2. **Nature and/or Description of the Action Being Processed:**  
The contract under consideration is a five year indefinite-delivery (IDC) contract to assist the Veterans Integrated Service Network (VISN) 1 Mental Illness Research Education and Clinical Center (MIRECC) at the Veterans Administration (VA) Connecticut Healthcare Center for the purpose of the development of sophisticated statistical methods to more precisely estimate the benefits of supported employment and supported housing to homeless veterans. This contract will involve the examination of an existing de-identified database to select the variables for examination and in design of the study methodology. The ceiling is approximately \$75,000.00.
3. **Description of Supplies/Services Required to Meet the Agency's Needs:**  
The purpose of this contract will be achieved through a close collaborative effort between the VA Principal Investigator, Dr. Robert A. Rosenheck, Health Services Research, at the VA Connecticut Healthcare System and the contractor, S. Marcus, sole-proprietor, Philadelphia, PA (DUNS: 968038344). Dr. Rosenheck and the contractor will have regular telephone and email communication during the life of the contract. The contractor will identify the variables for analysis and conduct the required instrumental variable analysis. At times the contractor will assist with the writing and construction of new analysis techniques to address the unique situations presented by the research questions. Once the variables have been identified and the analysis performed the contractor will summarize the results of the analyses in tables and assist with the preparation (including writing and revising text) of manuscripts for publications in medical peer-reviewed journals. Additionally, the contractor will address any technical questions relating to the database or how to run the analyses using the data.
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;
  - ( ) (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):**

The contractor is one of two people in the United States (US) to do the kind of instrumental variable analysis required by this work and is the only one of the two who has experience working with homeless people. The contractor is a nationally renowned specialist in causal inference with a Masters in Mathematics from Clark University and a Ph.D. in statistics from the Wharton School at the University of Pennsylvania. The contractor has over sixty publications in statistical areas, specializing in the use of observational data to make causal inferences, especially using instrumental variable techniques of the type required for the proposed analysis. In 2009 the contractor received the award for the Best Statistical Application from the American Statistical Association. The contractor is familiar with the kinds of missing data problems that invariably emerge when doing analyses on homeless people and will be uniquely able to develop methods that address the non-experimental nature of the data using instrumental variable techniques and the missing data problems posed by studies of homeless people. The contractor's sole authored review paper "Causal inference for the new millennium: a discussion of the Joint Statistical Meetings invited session on causal inference in epidemiology" American Statistical Association Proceedings of the Section of Statistics in Epidemiology 2000 summarized the work in the field that has greatest pertinence for the proposed work. The contractor is also quite familiar with the Housing and Urban Development (HUD)-Veterans Affairs Supported Housing (VASH) and Therapeutic Employment and Placement Support (TEPS) programs in the VA. This type of analysis requires a significant amount of time from an expert person to design and execute highly skilled technical work.

6. **Description of Efforts Made to ensure that offers are solicited from as many potential sources as deemed practicable:**

A synopsis and JOFOP will be posted to the Government Point of Entry, FedBizOpps. (FBO).

7. **Determination by the Contracting Officer that the Anticipated Cost to the Government will be Fair and Reasonable:**

The Contracting Officer will make a determination of price reasonableness prior to award.

8. **Description of the Market Research Conducted and the Results, or a Statement of the Reasons Market Research Was Not Conducted:**

In the VA system a Bio-Statistician and or an Economist can be a General Service (GS) 12 or above with a range in salary from \$77,585.00 to \$128,241.00, this is without fringe. Using a 30% fringe rate the salary range would become \$100,860.50 to \$166,713.30. Based upon a VA 40 hour work week the hourly range would be \$48.49 to \$80.15 for entry level.

With the background and expertise held by the contractor it is believed that the contractor would fall into one of the higher GS categories. The contract proposes to compensate the contractor at \$75.00 per hour which is slightly over the midrange value of the hourly rate \$64.32 however it is still consistent with an entry level position for an advanced candidate.

This contract proposes to pay the contractor, who has 32 years of experience as a doctoral level biostatistician and is a leading expert in the instrumental models methods needed for this analysis, \$75.00 per hour. It is proposed that the contractor will work on average approximately 2.5 hours a week or approximately 10 hours a month for the 12 month contract period bringing total costs to approximately

\$9,000, for the initial year task order. Additional year task orders, if any, will be of commensurate scale to the tasks required.

The contractor is uniquely positioned to complete the requirements of this contract because the contractor is one of the few biostatisticians in the country with expertise in instrumental variables methods and the only one with experience in areas of research on homelessness as the biostatistician for the Columbia Homeless Prevention Center associate with Columbia University, New York, New York.

9. **Any Other Facts Supporting the Use of Other than Full and Open Competition:**

The contractor is only one of two people qualified in the US with the capacity to conduct the type of statistical analysis required by this work and is the only qualified person with the background and prior experience in the studies of homeless people. The combination of ability and experience provides the contractor with a high level of academic expertise in this skilled technical ability.

10. **Listing of Sources that Expressed, in Writing, an Interest in the Acquisition:**

A synopsis of this action as well as this JOFOC will be posted to the Government Point of Entry.

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:**

The VA seeks to maximize competition whenever possible. The Investigator, Robert A. Rosenheck, and the AO/COR, Richard P. Carson, continue to monitor and survey this field of data analysis.

*(see attached signature page)*

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.

Richard P. Carson

Richard P. Carson  
Administrative Officer / COR  
VISN 1 MIRECC  
VA Connecticut Healthcare System  
950 Campbell Avenue, 151 D  
West Haven, CT 06159

1/10/2012

Date

13. **Approvals in accordance with FAR 6.304**

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

John A. Young

Digitally signed by John A. Young  
DN: cn=John A. Young, o=U.S. Government, ou=Department of Veterans Affairs,  
email=John.A.Young@va.gov, c=US, 0.9.2342.19200300.100.1.1=John.A.Young@va.gov,  
Date: 2012.01.11 09:18:33 -0500

John Young  
Contracting Officer 650/90C  
Network Contracting Office 1 – New England

Date

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

Kristine Clark

Digitally signed by Kristine Clark  
DN: c=US, o=U.S. Government, ou=Department of  
Veterans Affairs, ou=Internal Staff,  
0.9.2342.19200300.100.1.1=Kristine.Clark@va.gov,  
cn=Kristine Clark,  
Date: 2012.01.18 07:46:54 -0500

Kristine Clark  
Specialty Supervisory Contracting Officer  
Network Contracting Office 1 – New England

Date

- c. **QA:** I certify the justification meets requirements for other than full and open competition.

Mary J  
Connors

Digitally signed by Mary J Connors  
DN: c=US, o=U.S. Government,  
ou=Department of Veterans Affairs,  
ou=Internal Staff,  
0.9.2342.19200300.100.1.1=mary.co  
nnors@va.gov, cn=Mary J Connors  
Date: 2012.01.26 20:11:27 -0500

Mary Connors  
Quality Assurance/Contract Compliance Officer  
Network Contracting Office 1 – New England

Date