

## JUSTIFICATION & APPROVAL FOR OTHER THAN FULL AND OPEN COMPETITION

### 6.302-1 ONLY ONE RESPONSIBLE SOURCE

1. Contracting Activity: Department of Veterans Affairs (VA)  
Office of Procurement and Acquisition Logistics (OPAL)  
Strategic Acquisition Center (SAC)  
10300 Spotsylvania Avenue, Suite 400  
Fredericksburg, VA 22408
2. Description of Action Being Approved: The proposed action is for a sole source firm-fixed-price (FFP) contract with B and F Consulting Inc., a Small Business, for the procurement of Geriatrics and Extended Care (GEC) Support Services for a period of 24 months. The estimated value for this acquisition is \$2.2 Million and the anticipated period of performance for the awarded contract is as follows:

Base Period: September 30, 2019 – September 29, 2020

Option Period: September 30, 2020 – September 29, 2021

3. Description of the supplies or services required to meet the agency's needs:  
The VA Central Office (VACO) of Geriatrics and Extended Care (GEC) is tasked with improving staff engagement, Veteran experience, and person-centered care nationwide, to assist with meeting the agency's goals of Veteran care quality in Community Living Centers (CLCs). To help achieve these goals, VACO GEC launched the CLC Bright Spots Program in all 134 CLCs nationally in FY 17, and in FY18-19 expanded this program into the CLC's Ongoing National Center for Enhancing Resources and Training (CONCERT), and more fully integrated it with other existing VACO GEC CLC programs. GEC also launched and completed multi-month Learning Intensives (LIs) in 39 CLCs identified as struggling due to a CLC Compare quality score of 1 star (out of 5 stars).

CLCs have a documented need to improve the quality of care and person-centeredness of their care. Creating high-functioning, relationship-based teams has been shown to help improve care quality and person-centeredness by supporting staff to work better together and thereby better meet the needs of Veterans in their care. Interactive services to assist nursing / non nursing staff, program staff, and veterans through CLC Bright Spots Program (BSP) in all 134 CLCs nationally with CONCERT, and more fully integrated it with other existing VACO GEC CLC programs.

The purpose of this effort is to build a quality assurance performance improvement (QAPI) infrastructure to support the VACO GEC vision for system-wide improvement in staff engagement, Veteran experience, resident-centered care, and quality outcomes through the CLC's Ongoing National Center for Enhancing Resources and Training (CONCERT). CONCERT seeks to engage and support Community Living Center (CLC, i.e., VA nursing home) staff in successfully implementing CLC-based high-involvement QAPI. The expected results are creation of high-functioning, relationship-based CLC staff teams and team processes to improve staff functioning and morale and resident-

centered care focus and skill, thereby improving the Veteran experience. This work builds upon, supports, maintains, integrates, and extends the BSP/CONCERT work that was begun during FY17 and expanded and continued in FY18-19 by GEC, and provides operational support for VACO GEC's CLC Program Office.

To achieve the QAPI infrastructure objective, BSP/CONCERT must maintain, integrate/coordinate, and expand its operations over the 24 month period; to accomplish this, the Office of GEC has a need for a specialized Consulting Service for the nursing home work of Quality Improvement Organizations using the BSP to move "From Institutional to Individualized Care," with extensive, experience, and on the job training.

In FY 17 GEC achieved a staged rollout of the Bright Spots Program across all VISNs, focusing primarily on nursing staff and nurse leaders, through a train-the-trainer approach. This project used the Leadership Development for Staff Engagement in Individualizing Care and High-involvement Quality Improvement Closest to the Resident methods and techniques (referred to throughout as the "Relational Management" method and techniques) developed by B&F Consulting to roll out the Bright Spots program.

B&F Consulting helped develop and support the implementation of the BSP and CLC's Ongoing CONCERT roll-outs in VA CLCs in FY17-19. Their consulting services included: development of BSP rollout workshops, conduction of rollout site visits (including the preparation, planning, and team training and guidance for these visits); development and revision of BSP materials, including an implementation guide; strategic planning consultation for the development of CONCERT; consultation and coaching of the BSP/CONCERT team; consultation with GEC CLC Program leadership about integration of BSP/CONCERT with other CLC-related programs; development and implementation of two Learning Intensives (LIs) [one for 8 CLCs over 8 months, and a second for 31 CLCs over 5 months].

Having completed the Bright Spots Program national roll-out in FY17 and the CONCERT expansion in FY18-19 of LIs for 39 CLCs, GEC seeks to improve quality and person-centeredness of CLC care by implementing an ambitious 24-month BSP/CONCERT plan to maintain the BSP/CONCERT gains achieved through the first half of FY19, provide LI training to the remaining 90 CLCs, integrate and coordinate the BSP/CONCERT with other existing VACO programs, and extend the reach of BSP/CONCERT services.

**Maintenance** services consist of ongoing CONCERT/BSP staff consultation (mentoring and advising team regarding strategic planning, maintenance material development, and the team's roles as site support personnel for the CLCs).

**Integration/Coordination** services consist of ongoing guidance and support to VACO GEC's CLC Program Office regarding strategic planning and regarding integrating/coordinating the CONCERT/BSP program efforts with: CLC Compare

ratings, CLC surveys, CLC QAPI, MDS, and other field requirements, VACO GEC CLC Program Office technical support site visits, and other CLC-related VACO programs outside VACO GEC CLC Program Office (e.g., those in Office of Mental Health and Office of Nursing).

**Extension** services include:

a) Supporting Rapid Cycle Quality Improvement Learning Intensives to the remaining CLCs which have not yet participated in BSP/CONCERT LIs and to CLCs that previously participated and need a remedial LI.

b) Developing and delivering a workshop for the VISN GEC Leads and VISN Quality Management Officers (QMOs) and;

c) The preparation, planning, and consulting activities necessary to achieve (a-b).

4. Statutory Authority: The statutory authority permitting other than full and open competition is 41.U.S.C. 3304(a)(1) as implemented by the Federal Acquisition Regulation (FAR) Subpart 6.302-1 - Only One Responsible Source and No Other Supplies or Services Will Satisfy Agency Requirements.

5. Rationale Supporting Use of Authority Cited Above: One of GEC's roles in leading the nation's CLCs is to help CLCs improve the quality and person-centeredness of care for Veterans. Research has shown that high-functioning teams are critical to achieving such improvements. BSP/CONCERT was developed and implemented to provide CLCs with help in improving quality and person-centeredness of care through development of high-functioning teams.

BSP was developed specifically in VA CLCs through VA-funded research grants that allowed researchers to partner with B&F Consulting to systematically implement and modify the B&F Consulting-developed Leadership Development for Staff Engagement in Individualizing Care and High-involvement Quality Improvement Closest to the Resident methods and techniques. The BSP program was then expanded into CONCERT, again with careful systematic implementation and modification of the innovative and effective B&F Consulting-developed "Relational Management" methods.

Thus, the BSP/CONCERT approach is built on a multi-year foundation of customizing B&F Relational Management methods for the unique VA CLC environment. No other program exists for CLCs that specifically meets the unique VA CLC needs of patient / Veteran centric care. There are no other known service providers with the expertise, knowledge, internal and external programs, and training workshops / programs developed specifically for CLCs. B&F Consulting are the leaders in co-developers that have been instrumental in BSP, QOIs, veteran centric care. These cannot be imported into VA without substantial adaptation that takes considerable time,

experience, and proprietary programs because CLCs differ in important ways from nursing homes in the private sector than in the VA. (e.g., different staffing contexts and Veteran care responsibilities).

Therefore GEC needs to continue to invest in and expand the VA-customized BSP / CONCERT approach developed upon the foundation of VA research and B&F-developed Relational Management methods as the only existing program that can fulfill GEC's QAPI mission. Having completed the BSP national roll-out in FY17 and the CONCERT expansion in FY18-19 to LIs for 39 CLCs and thus needing to maintain gains, and given that over 90 CLCs remain that need LI training, as well as many other integration/coordination and expansion needs, GEC seeks to improve quality and person-centeredness of CLC care by implementing an ambitious 24-month BSP/CONCERT plan to: **maintain** the BSP/CONCERT gains achieved through FY19, **integrate and coordinate** the BSP/CONCERT with other existing VACO programs , and **extend** the reach of BSP/CONCERT services.

B&F Consulting offers the following unique services:

- a) National experience in the long-term care industry and person-centered care culture transformation in both community nursing homes and VA CLCs
- b) Experience with VA CLCs, as the population and staffing structure, nursing and non-nursing positions, differ from that of nursing homes in the private sector.
- c) An understanding of the unique challenge of VA CLCs operating as part of an integrated federal healthcare system.
- d) The company understands the unique dynamics of an interdisciplinary team and have successful experience in developing and mentoring high-functioning, relationship-based teams.
- e) A thorough expert understanding and implementation of their very own developed "Relational Management" methods and processes (i.e. Leadership Development for Staff Engagement in Individualizing Care and High-involvement Quality Improvement Closest to the Resident methods and techniques), as this is fundamental to BSP/CONCERT.
- f) A thorough understanding of BSP/CONCERT, programs developed specifically to meet the needs of VA CLCs.

B&F Consulting has implemented their method in hundreds of nursing homes throughout the nation, including in VA CLCs (2013-2014; 2017-2019). They co-developed the Holistic Approach to Transformational Change (HATCh) which developed a culture change model called HATCh: Holistic Approach to Transformational Change, and tools to support a quality improvement approach to culture change. It is the theoretical model embraced by VA's GEC. The HATCh model has been officially disseminated and used throughout VHA's CLC system since 2008 to improve and support resident-centered care. These include an Individualized Care

Curriculum, and Change Ideas on Consistent Assignment, Creating Home, Dining, Individual Choice, Pleasant Bathing, and Waking and Sleeping which are also instrumental with the BSP.

Finally, and most critically, they were instrumental in the development, implementation, and sustainment of the Bright Spots Program roll-out in VA CLCs in FY17. B&F co-developed a wide array of leadership training tools for Quality Improvement Organizations QIOs and providers, using proven management practices to help nursing home leaders bring out the leadership in others. No other nursing community care consulting firm has a comparable level of experience and expertise with the method or the specific subject area of implementing the Relational Management method in the nursing home environment and the VA CLC environment, nor of the Bright Spots Program. B&F Consulting are recommended because of their unique expertise, their unique knowledge of how to implement the “Leadership Development for Staff Engagement in Individualizing Care” method, their experience in working successfully with nursing homes that cannot be duplicated, and their familiarity with CLCs through prior work in public, but most importantly the VA CLCs.

B&F Consulting is the logical follow on vendor to complete the program as the only vendor who has already provided the services for the nationwide implementation described above due to the extent of their involvement and guidance in the development and implementation of BSP/CONCERT without any required training and phase in requirements; which if awarded to another vendor would result in a substantial duplication of costs and unacceptable delays.

6. A description of efforts made to ensure that offers are solicited from as many potential sources as is practicable, including whether a notice was or will be publicized as required by Subpart 5.2 and, if not, which exception under 5.202 applies: Two notices were publicized as required by Subpart 5.2.

7. Contracting Officer Determination: The anticipated cost to the Government will be evaluated to determine if it is fair and reasonable. No award shall be made until the Contracting Officer determines the cost to the Government to be fair and reasonable. This determination will be based on the Independent Government Cost Estimate.

8. A description of the market research conducted (see Part 10) and the results or a statement of the reason market research was not conducted: Market Research was conducted at the early stages of this effort to assess the market’s capability to provide nursing care and VA CLC consultation services on the development of high-functioning, relationship-based teams in the CLC environment. In August 2019, market analysis was used to determine the commerciality of the consulting services required. An internet search engine query indicated consulting services are available and offered in the commercial market place, general consulting services are procured by businesses, as well as government agencies alike. This fulfills the definition of a

commercial item as outlined in FAR 2.1. As a result of the commerciality of the services offered, the utilization of FAR Part 12 and the use of commercial clauses, terms, and conditions in the contract are recommended for this procurement.

The following market research methodology was executed:

- a) VetBiz query (IAWFAR 10.002(b)(2)(iv)-querying other Government databases relevant to agency acquisitions and VA Acquisition Regulations (VAAR) 810.001-Market Research Policy; Using NAICS code 623110, 29 results were found. However, in a dynamic search found no vendor with no mention of consulting services in referenced to HATCh, BSP, or CONCERT.
- b) Market research was conducted via a search of AbilityOne and no results found for consulting services.
- c) Market research was conducted via a search of UNICOR and no results found for consulting services.
- d) A Sources Sought was posted on Aug 27, 2019. Only one response was received.
- e) RFI – Special Notice to sole source was posted on August 30, 2019. No responses were received.

9. Any other facts supporting the use of other than full and open competition.

This requirement has been a sole source since the inception due to the expertise and nature of the requirement of the incumbent vendor B&F Consulting.

Only one Service Disabled Veteran Owned Small Business (SDVOSB) responded to the Sources Sought. There were deemed to not have the specialized experience to conduct such a program. No responses were received to the Special Notice to Sole Source. Therefore, the Contracting Officer cannot conclude that two or more SDVOSBs or Veteran Owned Small Business (VOSBs) and there is no confidence that two or more SDVOSBS or VOSBs will provides a response in order to set it aside to an SDVOSB or VOSB.

10. A listing of the sources, if any, that expressed, in writing, an interest in the acquisition.

Healthcare Quality Assistance Group, LLC  
2721 NW Denver Avenue  
Lawton, OK 73606

11. A statement of the actions, if any, the agency may take to remove or overcome any barriers to competition before any subsequent acquisition for the supplies or services required.

This will be the end of the program and there are no further anticipated acquisitions planned for in the future.

12. Certifications:

**Technical Representative Certification:**

Technical and Requirements Certification: I certify that the supporting data under my cognizance, which are included in this justification, are accurate and complete to the best of my knowledge and belief.

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Lisa Minor, RN  
Director, Facility Based Programs  
Geriatrics and Extended Care Operations

\_\_\_\_\_  
Date

**Contracting Officer Certification:**

Pursuant to (FAR 6.303-2(b)(12)), I certify that this justification is accurate and complete to the best of my knowledge and belief.

\_\_\_\_\_  
Mauricio Vazquez  
Chief, Acquisition Services Division 5A  
Contracting Officer

\_\_\_\_\_  
Date

**Competition Advocate Approval:**

Upon the basis of the above justification, I hereby approve, as advocate for competition for the procuring activity, the solicitation of the proposed procurements described herein using other than full and open competition, pursuant to the authority of 41.U.S.C. 3304(a)(1) and FAR Subpart 6.304(a)(2).

\_\_\_\_\_  
Donald J. Jones  
SAC Advocate for Competition  
Strategic Acquisition Center  
Department of Veterans Affairs

\_\_\_\_\_  
Date  
Competition Advocate  
Tracking number DJ015