

Attachment B: Request for Sole Source Memo Format

DEPARTMENT OF VETERANS AFFAIRS

Justification and Approval

For

Other Than Full and Open Competition

1. **Contracting Activity:** Department of Veterans Affairs, VISN 11, Battle Creek Medical Center Grand Rapids Veterans Counseling services is seeking to use of "Justification for Other Than Full and Open Competition" for its Counseling services located in the Big Rapids, MI area. The 2237 transaction number to be used is 515-13-1-5644-0001.
2. **Nature and/or Description of the Action Being Processed:** The action to be approved would be counseling services that would be modified from a current contract in place (VA251-V-0318). This will be for a firm fixed price as negotiated with the vendor.

The proposed vendor(s) will provide individual and group counseling for combat Veterans. This is being submitted for Justification and Approval. Through this service the Veterans work towards skills that help them readjust to civilian life from their combat experiences. Riverview Counseling and Wellness Center, P.C., is the current vendor for this service in the Big Rapids, MI area. Anticipated value of this contract is approximately \$130,200.00 per contract year, with three option years. Estimated award date would be for beginning Fiscal Year 2013, October 1, 2012, with completion of contract September 30, 2015, if all three option years are exercised.

3. **Description of Supplies/Services Required to Meet the Agency's Needs:** Vendor should have relevant training in counseling for symptoms related to Post Traumatic Stress Disorder. The vendor will offer individual counseling to Veterans, as well as offer group counseling services. The vendor will schedule Veteran for three visits to complete an intake assessment and complete a treatment plan specifying what Veterans needs will be. Vendor will have on staff a current licensed Psychologist, Licensed Mental Health Professional, and/or Licensed Social Worker.
4. **Statutory Authority Permitting Other than Full and Open Competition:** *41 USC §253(g), as implemented by FAR 6.302.*

- (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):**

To sole source this contract is in the best interest of all parties involved. The availability of providers in the area is limited and do not necessarily "specialize" in the treatment of veterans that have been involved in combat. The veteran feels so strongly about this current provider that congressional contacts have been made from the veterans in regards to the provider about the knowledge and expertise that is brought to the veteran when he/she is seen for a session. The other providers in the area do not currently have established rapport with the veterans. To try and change the veterans in mid-stream of their counseling would/could hinder their readjustment from military to civilian life. Trust of other providers may make it a difficult transition causing even further issues. The veteran may decide to not seek counseling services whatsoever.

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

When conducting our market research it became evident that providers in the area are scarce. Although we were able to obtain information from three different providers, of those three sources none were able to meet our agency's needs. Group counseling is a requirement for the Vet Center Program; two of the providers, Northern MI Counseling Services, and Dr. Omar Mangrum, indicated that they would have to sub-contract out in order to meet this requirement. The third vendor indicated he was not interested in meeting the requirement for providing group counseling. Moreover, even though the charges for individual counseling sessions, \$100/hour and \$120/hour for Northern, MI and Dr. Mangrum, respectfully, are comparable to the current vendor, their inability to meet all of the provisions of the Statement of Work, i.e., group counseling, nullifies the issue of cost with these potential sources. Furthermore, while Nova Counseling Associate's fee for individual counseling is only \$55/hour, this potential source has indicated that they would be unable to meet the demands of the high number of veterans currently being served in the contract fee catchment area.

7. **Determination by the Contracting Officer that the Anticipated Cost to the Government will be Fair and Reasonable:** *Include a statement by the contracting officer that the anticipated cost will be considered fair and reasonable and provide the basis for this determination. The steps that will be taken to ensure the final contract price will be fair and reasonable are also described here. Describe the extent of cost or price analysis anticipated including the requirements for certified cost or pricing data, technical evaluations, and audits (FAR 6.303-2(a)(7)).*

A determination will be made at the time of award by the Contracting Officer. The Contracting Officer intends to compare other NCO 11 Readjustment Counseling Contracted rates and make a determination at that time if the prices proposed are within an acceptable range for these services.

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

Three contacts were made by telephone with providers in the area of interest for our Veterans. Each provider responded to questions asked in regards to services that they could provide to our Veterans for readjustment counseling. As stated above, two of the providers would have to sub-contract group services, and the third did not have interest in providing group counseling. Group visits are a requirement and will remain in the Statement of Work.

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

Veterans are currently seen by Riverview Counseling and Wellness Center PC. One of the reasons we have chosen to sole source is because of continuity of care for our Veterans. Rand Corporation conducted research and in an article *Improving Mental Health Care for Returning Veterans* it states "The mental health specialty workforce lacks sufficient training in evidence based practices." It also goes on to say "many are unfamiliar with military culture or combat-related trauma disorders." Veterans who work with Riverview Wellness are given the expertise of Dr. Kane, the provider there. Veterans have stated that if Dr. Kane cannot give them services they would contact their congressman. Dr. Kane has the proper training for seeing our Veterans. It has been proven that Veterans from all conflicts can have issues disclosing their combat trauma due to various issues. It could be made considerably more difficult if they would need to change providers while in the midst of revealing their issues.

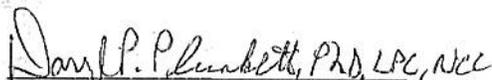
10. **Listing of Sources that Expressed, in Writing, an Interest in the Acquisition:**

See Section VI above

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 only actions, at this point, that could be taken would be to periodically (bi-yearly) to investigate for new providers in the area who have experience in the care of our Veterans, and assisting with their issues. There would actually be no concrete way in which to overcome the barriers, unless when doing the next posting, to state in the marketing research, who specializes in issues related to combat.

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.



Darryl P. Plunkett, PhD, LPC, NCC

Team Leader

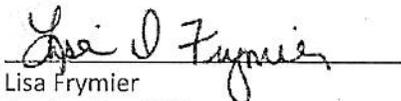
Grand Rapids Veterans Center

July 30, 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.



Lisa Frymier

Contracting Officer

Network 11 Contracting Office

July 30, 2012

Date

- b. **VISN/PCA QA:** I certify that the foregoing justification is accurate and complete to the best of my knowledge and belief.

Name
Title
Facility

Date

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

Jani Waggoner Boy

Name
Network Contract Manager
VISN/PCA X

2 Aug 12

Date

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

Name
Director
Service Area Office, East

Date

- e. **VHA HCA Review and Approval:** I have reviewed the foregoing justification and find it to be complete and accurate to the best of my knowledge and belief and recommend approval (over \$50 million), approve (up to \$ 50 million) for other than full and open competition.

Frederick Downs, Jr.
Chief Procurement and Logistics Officer
VHA Head of Contracting Activity (HCA)

Date

- f. **VA Deputy Senior Procurement Executive Approval (over \$10 not exceeding \$50 million):** 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.

Iris B. Cooper
Deputy Senior Procurement Executive (DSPE)
Office of Acquisition and Logistics
Department of Veterans Affairs

Date

- g. **VHA Senior Procurement Executive Approval (over \$50 million):** 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.

Jan R. Frye
Deputy Assistant Secretary for Acquisition and Logistics
Senior Procurement Executive (SPE)
Department of Veterans Affairs

Date