

- 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.

  
\_\_\_\_\_  
Name  
Network Contract Manager  
VISN/PCA X

  
\_\_\_\_\_  
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

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. The Grand Rapids Vet Center is seeking to use "Justification for Other Than Full and Open Competition" for its counseling services located in the Kalamazoo, MI area. The 2237 transaction number to be used is 515-13-1-5644-0002.
2. **Nature and/or Description of the Action Being Processed:** The action to be approved would be Readjustment Counseling services that would be modified from a current contract in place (VA251-V-0319). 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. Through these services the Veterans work towards skills that help them readjust to civilian life from their combat experiences. Kalamazoo Psychology, P.C, is the current vendor for this service in the Kalamazoo, MI area. Anticipated value of this contract is approximately \$87000.00 per contract year, with <sup>three</sup> ~~four~~ option years. Estimated award date would be for beginning Fiscal Year 2013, October 1, 2012, with completion of contract September 30, 201<sup>5</sup>~~6~~ if all option years are applied.

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 Veterans for three visits to complete an intake assessment and complete a treatment plan specifying what the Veterans needs are. Vendor will have on staff qualified mental health providers that specialize in treatment of combat Veterans and their related issues.
4. **Statutory Authority Permitting Other than Full and Open Competition:** 41 USC §253(g), as implemented by FAR 6.302.

- (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):**

To sole source this contract is in the best interest of all parties involved. The availability of providers in the area is limited and those identified do not necessarily "specialize" in the treatment of Veterans who have been involved in combat, nor do they offer group counseling. The current Veterans feel so strongly about this current provider that congressional contacts have been made from the Veterans in regards to the providers of this practice 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 change the Veterans in mid-stream of their counseling would/could hinder their readjustment from military to civilian life. Mistrust of other providers may make it a difficult transition causing even further distress and 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:**

Three contacts were made by telephone with providers in the area of interest for our Veterans. Dr. Irene Mann, CM Psychotherapy, LLC, and Bruce A Heustis and CM Psychotherapy, LLC. Each provider responded to questions in regards to services that they could provide to Veterans for readjustment counseling. While conducting research for services available in the Kalamazoo and surrounding areas, it was discovered that group services are very limited. Group counseling is required per the Statement of Work, however, each provider contacted conducted individual therapy, but they would not be able to provide group counseling. There were no other vendors identified who could provide both individual and group counseling for the population served by the Vet Center Program. Charges for the providers ranged from \$80 – 90 per session to \$110 – 130 per session.

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:**

Contacts were made by phone for providers in the Kalamazoo Area. Three providers in the area were contacted and all three providers only conduct individual therapy. None of the providers are able to offer group counseling for the Veterans. Costs ranged from \$80 – 90 per session for the Licensed Professional Counselors, to \$110 – 130 for Psychologists.

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

Veterans are currently seen by Kalamazoo Psychology, P.C. One reason for opting to sole source is because of continuity of care for the Veterans. They are able to offer Veterans the services that the Vet Center Program requires. Rand Corporation conducted research and in an article *Improving Mental Health Care for Returning Veterans* stated, "The mental health specialty workforce lacks sufficient training in evidence based practices." Moreover, the authors noted that "many are unfamiliar with military culture or combat-related

trauma disorders." Veterans who work with Kalamazoo Psychology are given the expertise of four providers with history of treating Veterans with issues related to PTSD, and are also able to conduct group sessions multiple times per month. It has been proven that Veterans from all conflicts can have problems disclosing their combat trauma. These problems can be exacerbated if the veterans are required to change providers in the midst of disclosing their experiences and issues. The Vet Center Program services are specific to combat Veterans and their families.

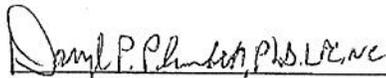
**10. Listing of Sources that Expressed, in Writing, an Interest in the Acquisition:**

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) communicate with current and new providers in that demographic area, see if their counseling services are geared more to the veteran, and their ability to conduct not only individual, but also group sessions on a regular basis.

**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, Ph.D., LPC, NCC  
Team Leader  
Grand Rapids Veterans Center

July 30, 2013  
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  
Contract Specialist  
NCO 11 Contract Service Center

July 25, 2012  
Date