DEPARTMENT OF VETERANS AFFAIRS

Justification and Approval (J&A)
For
Other Than Full and Open Competition

Acquisition Plan Action ID: 36C261-26-AP-2326
JOFOC Tracker: FY26-NCO 21 - 1527

1. **Contracting Activity:** Department of Veterans Affairs, Veterans Integrated Service Network (VISN) 21, Network Contracting Office (NCO) 21, on behalf of VA Northern California Health Care System (VANCHCS). 2237: 612-26-3-6133-0035

2. **Nature and/or Description of the Action Being Approved:** De-Ionized/Reverse Osmosis (DI/RO) – Water System Maintenance for the VA Northern California Health Care System (VANCHCS). Plan to award a new firm fixed price contract for a one (1) year period of performance, with no option periods, aside from 52.217-8, option to extend services.

3. **Description of Supplies/Services Required to Meet the Agency's Needs:** Processing Service (SPS) departments and research department in the Veterans Affairs Northern California Healthcare System. Contractor shall ensure the water filtration systems operate efficiently and remain compliant with ANSI/AAMI ST108 standards (for SPS RO/DI's only) and the manufacturer's instructions for use (all units).

   EWA Direction Inc., which has successfully performed different types of maintenance services throughout facilities within NCO 21.

   Independent Government Cost Estimate (IGCE): $191,104.24

4. **Statutory Authority Permitting Other than Full and Open Competition:** 41 USC §3304(a)(5), 38 U.S. Code § 8127(c), as implemented by FAR 6.302-5 (Authorized or Required by Statute). COs may use the non-competitive (sole source) procedures authorized in VAAR 819.7008 (DEVIATION) or VAAR 819.7009 (DEVIATION) up to $5,000,000. Check the specific VAAR clause used below:

   (X) 819.7008 Sole source awards to a certified service-disabled veteran-owned small business; or
   ( ) 819.7009 Sole source awards to a certified veteran-owned small business

5. **Demonstration that the Contractor's Unique Qualifications and/or Nature of the Acquisition Requires the Use of the Authority Cited Above (applicability of authority):**

   VAAR 819.7008 authority allows sole source awards to a SDVOSB based on 38 U.S.C. 8127(c) if the following conditions are met:

   a. The proposed contractor is a small business concern under the North American Industry Classification System (NAICS) code assigned to the acquisition and determined to be a responsible source with respect to performance of such contract opportunity. EWA Direction Inc. maintains an active registration in SAM.gov, is not on the Excluded Parties List, has an active SBA VetCert certification and is interested in providing these services.

b. In the estimation of the contracting officer, the contract award can be made at a fair and reasonable price that offers best value to the United States. EWA Direction Inc. has provided competitive rates.

c. To be eligible, contractors must be verified as Service-Disabled Veteran-Owned Small Businesses (SDVOSB) in the SBA VetCert database. The contractor, EWA Direction Inc., is SBA VetCert verified since 2021 with an expiration date of 4/19/2027.

d. The statutory limitation of a sole source acquisition is $5,000,000.00, and the total procurement value of this action will be $191,104.24 and has been determined to be a responsible source with respect to performance.

6. **Description of Efforts Made to ensure that offers are solicited from as many potential sources as deemed practicable, including whether a notice was or will be publicized as required by FAR Subpart 5.2 and, if not, which exception under FAR 5.202 applies:**

   Statutory Authority VAAR 819-7008 sole source award to a verified service-disabled veteran owned small business (SDVOSB), EWA Direction Inc., because we have been given the authority, is in the best interest of the Government. A sources sought notice posted to GSA yielded no capable or interested respondents, as well as a notice of intent to sole source via SAM.gov. Based on these results and the Government's knowledge of the marketplace, the identified contractor has demonstrated the capability and experience to successfully fulfil the requirement. Proceeding with a competitive solicitation is not expected to result in additional qualified responses and would unnecessarily delay fulfillment of the Government's needs.

7. **Determination by the CO that the Anticipated Cost to the Government will be Fair and Reasonable:** The Contracting Officer will review and determine if the anticipated price is fair and reasonable. FAR Part 13 Open Market Award Decision Documentation Form shall detail how the Government will determine that the anticipated cost is fair and reasonable.

8. **Description of the Market Research Conducted and the Results, or a Statement of the Reasons Market Research Was Not Conducted:** EWA Direction Inc., met the eligibility criteria outlined in VAAR 819.7003(DEVIATION), they are certified in VetCert and the action is below the $5M threshold. Reviewed all the Contractor Performance Assessment Reporting System (CPARs) for EWA Direction Inc., and all ratings were satisfactory or higher.

9. **Any Other Facts Supporting the Use of Other than Full and Open Competition:** None. Statutory Authority VAAR 819-7008 sole source award to a verified service-disabled veteran owned small business (SDVOSB).

10. **Listing of Sources that Expressed, in Writing, an Interest in the Acquisition:**
    EWA Direction Inc. (SDVOSB)
    2211 Ala Wai Blvd.
    Honolulu, HI 96815

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**: Due to the specialized nature of this requirement and the absence of additional capable sources identified

through market research, no immediate actions are planned to increase competition. The Government will continue to conduct market research to identify potential new sources. Additionally, the requirement will be reevaluated prior to any follow-on acquisitions to determine if competitive conditions have improved.

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.

13. **Approvals in accordance with the VHAPM Part 806.3 OFOC SOP:**

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

DURELL SALAZ Digitally signed by DURELL SALAZ
Date: 2026.06.16 10:29:41 -07'00'

Durell Salaz Contracting Officer Network Contracting Office (NCO) 21	Date