DEPARTMENT OF VETERANS AFFAIRS

Justification and Approval

For

Exception to Fair Opportunity Memo

Acquisition Plan Action ID: 36C255-26-AP-1430

1. **Contracting Activity:** Department of Veterans Affairs (VA), Veterans Integrated Service Networks (VISN 15), Network Contracting Office (NCO) 15, 3450 S 4th Street Trafficway, Leavenworth, KS 66048, in support of Department of Veterans Affairs, Harry S. Truman Memorial Veterans' Hospital, 800 Hospital Drive, Columbia, MO 65201-5275.

   Purchase Request Number: 589-26-2-7311-0098

2. **Description of Action:** The proposed sole source task order against the NASA SEWP V ID/IQ Contract number, NNG15SD34B, is for a one-time purchase, Firm-Fixed-Price (FFP) effort for the Harry S. Truman Memorial Veterans' Hospital for Bar Code Medication Administration (BCMA) Cart equipment, with Minburn Technology Group, LLC an SDVOSB vendor, that is the sole authorized distributor of the original equipment manufacturer (OEM), Howard Med Technology Solutions, LLC.

3. **Description of Supplies or Services:** The proposed action is to provide 37 each, to the Harry S. Truman Memorial Veterans' Hospital, BCMA Carts equipment, which is the replacement fleet of the current, at end of life, BCMA Carts.

   The total estimated value of the proposed action is $565,165.59.

4. **Statutory Authority:** The statutory authority permitting an exception to fair opportunity is Section 41 U.S.C. 4106(c) as implemented by the Federal Acquisition Regulation (FAR) 16.505(b)(2)(i):

   (X) FAR 16.505(b)(2)(i)(E): For orders exceeding the simplified acquisition threshold, a statute expressly authorizes or requires that the purchase be made from a specified source. The statutory authority permitting an exception to fair opportunity for this action is 38 U.S.C. 8127(c), known as the Veterans First Contracting Program which provides the authority to directly contract with a Service-Disabled Veteran-Owned Small Business (SDVOSB) or a Veteran-Owned Small Business (VOSB).

5. **Rationale Supporting Use of Authority Cited Above:** This justification is in support of FAR 16.505(b)(2)(i)(E), For orders exceeding the simplified acquisition threshold, a statute expressly authorizes or requires that the purchase be made from a specified source. This requirement exceeds the Simplified Acquisition Threshold (SAT) and will be ordered against an existing indefinite delivery vehicle to ensure proper application of the NMR "Exception."

6. **Efforts to Obtain Competition:** Market research was conducted, details of which are in the market research section of this document. This effort did not yield any additional sources that can meet the Government's requirements. There is no competition anticipated for this acquisition. In accordance with FAR 5.301 and 16.507-6(f), the award notice for this action will be synopsized on the System for Award Management (SAM) website and the justification will be made publicly available.

7. **Actions to Increase Competition:** The Government will continue to conduct market research to ascertain if there are changes in the marketplace that would enable the completion of future actions.

8. **Market Research:**

A search was conducted using NAICS 541519 and key words "BCMA Cart," on the following sites:

- SBA Small Business database for VET CERT: One VetCert SDVOSB, Minburn Technology Group NASA SEWP V Contract NNG15SD34B.
- SCMC: Minburn Technology Group, LLC Blanket Purchase Agreements (BPA) with VISNs 01 and 10.
- SAM: Sources include the following: Minburn Technology Group, LLC – SDVOSB NASA SEWP V Contract NNG15SD34B; and Hill Laboratories Co. – Small Business.
- GSA: No mandatory sources.

Additionally, a Sources Sought Notice was published 03/18/2026 on www.SAM.Gov and ended 04/02/2026 with responses from the following vendors:

- AB Martin Services, Inc. – SDVOSB; however, Capsa Healthcare Carts offered on VA FSS Contract 36F79724D0069 are Computing Workstation, Emergency and Storage Medical Carts, not a BCMA Cart.
- Aviate Enterprises, Inc. – SDVOSB; however, Capsa Healthcare Carts are offered as open market only.
- I3 Federal, LLC – SDVOSB NX EQ Capsa Medical Carts Contract 36C10G25D0003; however, Capsa M38 Cart offered is a Computing Workstation Medical Cart and not a BCMA Cart.
- Minburn Technology Group, LLC – SDVOSB NASA SEWP V Contract NNG15SD34B. Cart offered is the Hi-Paradigm E 3-Tier Med Dispensing Medical Cart and is a BCMA Cart.
- SouthernBelle Room, LLC – SDVOSB; however, Waterloo 6-Drawer Tall Emergency Cart offered is an Emergency Crash Cart and not a BCMA Cart.

This requirement is above the SAT and the BCMA carts are manufactured by a Large Business. To ensure proper application of the NMR "Exception," it is recommended to order the BCMA carts against the following existing indefinite delivery vehicle: Minburn Technology Group NASA SEWP V Contract NNG15SD34B.

9. **Other Facts:** None known.

10. **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.

JESSICA FURLONG
Digitally signed by JESSICA FURLONG
Date: 2026.05.05 08:18:04 -05'00'

Jessica Furlong
Executive Assistant
Patient Care Services (PCS/ADIR)

11. Determination that Anticipated Cost is Fair and Reasonable: A determination by the contracting officer that the anticipated cost to the Government will be fair and reasonable:

I hereby determine that the anticipated price to the Government for this contract action will be fair and reasonable based on the NASA SEWP Program has already determined the prices to be fair and reasonable.

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

TYWANNA SPARKS
Digitally signed by TYWANNA SPARKS
Date: 2026.05.05 08:21:23 -05'00'

Tywanna Sparks
Contracting Officer
NCO 15

13. Approvals in accordance with VHAPG Part 816.505 Indefinite Delivery Contracts: Ordering.

a. One Level Above the Contracting Officer (Required over SAT but not exceeding $900K): I certify the justification meets requirements for other than full and open competition.

RANDALL COMBS
Digitally signed by RANDALL COMBS
Date: 2026.05.05 15:17:50 -05'00'

Randall Combs
Division Chief
Network Contracting Office (NCO) 15