SOLE SOURCE JUSTIFICATION
GSAM/R 538.7104-3(b)

This justification aligns with the deviation outlined in the Revolutionary FAR Overhaul (RFO) for FAR 8.4 - Ordering under the Federal Supply Schedule and GSAM/R 538.71, as required by Executive Order (E.O.) 14275, Restoring Common Sense to Federal Procurement, signed April 15, 2025. Deviation effective date: November 3, 2025.

Acquisition Plan Action ID: 36C247-26-AP-4006

1. **Contracting Activity:** The Department of Veterans Affairs Network Contracting Office (NCO) 7, and the Procurement Systems and Informatics Office (PSI).
   Funding: Funding Memo

2. **Description of Action:** This acquisition is conducted under the authority of the Multiple-Award Schedule Program (41 U.S.C. 152(3) and 40 U.S.C. 501).
   This is a new firm-fixed-price requirement. The contractor shall provide program analyst, program management, and acquisition support services throughout the duration of this order. All services provided are for NCO 7 and PSI. The contractor shall deliver non-personal, non-inherently governmental advisory services to support the VA's Contracting Officers (COs), Contract Specialists (CS), and Contracting Officer Representatives (CORs). Under no circumstances will any contractor perform program analyst or consultant functions that are inherently governmental, as outlined in Federal Acquisition Regulation (FAR) part 7.503(c)(12). All contractor services shall comply with applicable public laws, statutes, VA policies, and procedures.

   Order against: ☒ FSS Contract Number: GS-35F-128DA

Name of Proposed Contractor:	VETERANS MANAGEMENT SERVICES, INC.
Street Address:	14 PIDGEON HILL DR STE 500
City, State, Zip:	STERLING, VA 20165-6151
Phone:	703-563-4605

3. **Description of Supplies or Services:**
   The estimated value of the proposed action is $ 4,944,258.50
   The contractor shall provide program analyst, program management, and acquisition support services throughout the duration of this requirement. The contractor shall deliver non-personal, non-inherently governmental advisory services to support the VA's Contracting Officers (COs), Contract Specialists (CS), and Contracting Officer Representatives (CORs). Under no circumstances will any contractor perform inherently governmental functions, as

outlined in RFO 7.503(c). All contractor services shall comply with applicable public laws, statutes, VA policies, and procedures. The period of performance is one year, with an estimated start date of September 22, 2026, and an end date of September 21, 2027.

4. **Identify the Authority and Supporting Rationale** (see below and if applicable, a demonstration of the proposed contractor's unique qualifications to provide the required supply or service.

   ☒ GSAM/R 538.7104-3(b)(1)(v): A law expressly authorizes or requires that the purchase be made from a specified source.
   41 USC §3304(a)(5), 38 U.S. Code § 8127(c), as implemented by RFO 6.103-5 (Authorized or Required by Statute). COs may use the non-competitive (sole source) procedures authorized in VAAR 819.7008 (DEVIATION) up to $5,000,000.

5. **Describe Why You Believe the Order Represents the Best Value** consistent with GSAM/R 538.7102-2(b)(4) to aid the contracting officer in making this best value determination**:**
   Veterans Management Services, Inc. (VMSI) has historically and currently provided similar services across the Department of Veterans Affairs and has consistently performed those services at a level higher than expected, earning an overall CPARS rating of "Exceptional" on their last eight contract evaluations.

   VSMI is currently providing services for NCO 7 and has successfully performed three contracts for the same services over the course of two and a half years at an exceptional performance level. Not utilizing a contractor like VSMI could negatively impact patient care by reducing the amount of contract actions that NCO 7 can process. Their proven track record demonstrates a capability to deliver high-quality services that are essential for maintaining optimal patient outcomes that the contracting office assist in providing with the facilities.

   Additionally, with the expected increase in workload for fiscal year 2027, we need contractor support from a provider like VMSI to effectively manage the work and maintain high-quality services. Moreover, VAAR 819.7008 authority authorizes sole-source awards to SDVOSB/VOSB based on 38 U.S.C. 8127(c), provided that the SDVOSB/VOSB concern has been deemed a responsible source regarding performance.

6. **Describe the market research conducted among schedule holders and the results, or provide a statement explaining why market research was not conducted.**
   Due to the sole-source nature of this requirement, market research was limited to verifying that no mandatory sources were capable of providing these services, nor were there any mandatory existing contracts against which an order could be placed. Purchase orders were previously issued for this requirement on an open-market basis; however, the intended contractor holds an FSS contract under Professional Services - Business Administrative Services, and an order can be placed. VMSI meets the eligibility criteria outlined in VAAR 819.7003 (DEVIATION), is certified by the SBA, and the action is below the $5M threshold.

7. **Any Other Facts Supporting the Justification:** None, sole source authority under VAAR 819.7008

8. **A Statement of the Actions,** if any, the agency may take to remove or overcome any barriers that led to the restricted consideration before any subsequent acquisition for the supplies or services is made**:** The procuring agency will consider establishing a competitive long-term requirement if market research shows there are at least two SDVOSBs capable of providing services at the same performance level as VMSI and a long-term requirement is needed.

9. **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. I understand that processing of this sole source justification restricts consideration of Federal Supply Schedule contractors to fewer than the number required by GSAM/R 538.71 as directed by FAR 8.4. *(This signature is the requestor's supervisor, fund control point official, chief of service or someone with responsibility and accountability.)*

[redacted]

DATE

Deputy Director of Contracting
Network Contracting Office 7

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

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

[redacted]

Chaz D. Bowling
Contracting Officer
Network Contracting Office 7

DATE

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

[redacted]

TE

Division Chief
Network Contracting Office 7

HIGHER LEVEL APPROVAL (Required *for orders over $900,000)*

c. **VHA RPO HCA Review and Approval (over $900,000 to $90 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 restricting consideration of the Federal Supply Schedule contractors to fewer than the number required by GSAM/R 538.71 ordering procedures as directed by FAR 8.4.

[redacted]

DATE

Acting Executive Director
Head of Contracting Activity
Regional Procurement Office – East