DEPARTMENT OF VETERANS AFFAIRS

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

Acquisition Plan Action ID: 36C256-26-AP-4276

1. **Contracting Activity:** *Department of Veterans Affairs,*
Network Contracting Office 16 (NCO 16)
5075 Westheimer Rd, Ste 750
Houston, TX 77056

Organizational Activity: Department of Veterans Affairs, VISN 16
2002 Holcombe Boulevard
Houston, TX 77030

Requisition Number: 580-26-3-039-0086

2. **Nature and/or Description of the Action Being Approved:**

The Michael E. DeBakey VA Medical Center (MEDVAMC) at 2002 Holcombe Boulevard, Houston, TX 77030 is requesting an emergency short term contract to maintain contracted Psychiatrist services. This short-term bridge contract is necessary while we await the award of the long-term 5-year contract. The action under review is an urgent bridge procurement to ensure uninterrupted psychiatric care for Veterans until the resolution of a protested competitive solicitation. The requirement will be awarded as a new firm-fixed-price contract to the incumbent contractor, Millbrook Support Services, Inc., who is already credentialed, cleared, and integrated into VA systems.

This procurement is in accordance with FAR Overhaul 12.102(b).

3. **Description of Supplies/Services Required to Meet the Agency's Needs:**

The contractor shall provide licensed Psychiatrist services to support inpatient, outpatient, and residential mental health programs at MEDVAMC and it's Community Based Outpatient Clinics.

This is a sole-source, single award, firm-fixed-price open market contract. The emergency short-term bridge requirement will cover the period from July 18, 2026 through January 17, 2027 to ensure there is no impact on patient safety while the long-term contract is being awarded.

The estimated total value of this bridge requirement is: $1,412,476.00

4. **Statutory Authority Permitting Other than Full and Open Competition:**

(X) (1) Only One Responsible Source and No Other Supplies or Services Will Satisfy Agency Requirements per 41 USC §3304(a)(1) as implemented by RFO 6.103-1;
( ) (2) Unusual and Compelling Urgency per 41 USC §3304(a)(2) as implemented by RFO 6.103-2;
( ) (3) Industrial Mobilization, Engineering, Developmental or Research Capability or Expert Services per 41 USC §3304(a)(3) as implemented by RFO 6.103-3;
( ) (4) International Agreement per 41 USC §3304(a)(4) as implemented by RFO 6.103-4
( ) (5) Authorized or Required by Statute per 41 USC §3304(a)(5) as implemented by RFO 6.103-5;
( ) (6) National Security per 41 USC §3304(a)(6) as implemented by RFO 6.103-6;
( ) (7) Public Interest per 41 USC §3304(a)(7) as implemented by RFO 6.103-7;

5. **Demonstration that the Contractor's Unique Qualifications or Nature of the Acquisition Requires the Use of the Authority Cited Above (applicability of authority):** The long-term contract soliciation has been protested and cannot proceed until the protest is resolved, and competition for the short-term requirement would cause an unacceptable delay in Psychiatric services currently being provided to Veteran patients. The incumbent contractor is the only source capable of providing uninterrupted psychiatric services within the urgent timeframe due to:

- Established Clinical Integration – Fully credentialed, privileged, and cleared to work in VA systems.
- Continuity of Care – Currently managing active treatment plans for high-acuity Veterans.
- Operational Familiarity – Proficient in VA-specific EHR systems and protocols.
- Immediate Availability – Staff already embedded at the facility.

Any other source would require 90–120 days for onboarding, which is incompatible with the urgent need to avoid a lapse in care.

6. **Description of Efforts Made to ensure that offers are solicited from as many potential sources as possible (including whether a notice was or will be publicized as required by RFO Part 5 and, if not, which exception under RFO Part 5 applies):** The current long-term requirement was competed 03-26-2026; under full and open competition prior to the protest. Multiple vendors submitted proposals. Given the urgent need, a short-term bridge contract was determined to be the most viable option to guarantee that services continue seamlessly, ensuring no disruption in care for our veterans. Only the incumbent can meet the immediate need without delay. Additional sources would require onboarding time that would cause a service gap, as identified in #5 above. The justification will be made publicly available within 14 days after the contract award in accordance with RFO 6.301(b).

7. **Determination by the CO that the Anticipated Cost to the Government will be Fair and Reasonable:**
   The anticipated cost will be deemed fair and reasonable. The proposed rates are consistent with the current competitively awarded contract and comparable to recent awards for similar services. No urgency premium is included. Continuity avoids additional costs from onboarding delays and service disruption.

8. **Description of the Market Research Conducted and the Results, or a Statement of the Reasons Market Research Was Not Conducted:**
   Market research was conducted during the competitive solicitation process, including vendor outreach via SAM.gov and review of historical pricing. Multiple capable vendors were identified and were allowed competition opportunities for the long-term solicitation, but all non-incumbents require onboarding time incompatible with the urgent need.

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

   - 24% vacancy rate in Government Psychiatrist positions.
   - High-acuity patient population requiring continuous care.
   - Protest delay preventing timely award.
   - Exhaustion of FAR 52.217-8 extension authority.
   - Onboarding constraints for new vendors.

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

    Only the incumbent can meet the immediate requirement without delay.

    Millbrook Support Services
    36 Maple PL
    Manhasset, NY
    11030

    SAM number: E2UBKGNNGCX7

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**:

    This urgent short-term bridge requirement is critical to prevent a service gap. The

Government will continue to conduct thorough market research to identify any market changes that could facilitate future competitive actions, all while ensuring uninterrupted service.

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.

SARAH BROWNE Digitally signed by SARAH BROWNE Date: 2026.07.09 11:40:57 -05'00'

Sarah Browne — Date
Contracting Officer's Representative (COR)
Michael E DeBakey VA Medical Center

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

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

SHELIAH SAUNDERS Digitally signed by SHELIAH SAUNDERS Date: 2026.07.09 11:45:05 -05'00'

Sheliah Saunders — Date
Contract Specialist (CS)
Network Contracting Office (NCO) 16

STEPHANIE KEO Digitally signed by STEPHANIE KEO Date: 2026.07.09 12:45:01 -05'00'

Stephanie Keo — Date
Contracting Officer (CO)
Network Contracting Office (NCO) 16

b. **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.

COREY LABBE Digitally signed by COREY LABBE Date: 2026.07.10 12:33:48 -05'00'

Corey Labbe — Date
Medical Sharing Brach Chief
Network Contracting Office (NCO) 16

c. **Director of Contracting:** I certify the justification meets requirements for other than full and open competition.

Reuben Zepeda

Digitally signed by Reuben Zepeda
Date: 2026.07.16 14:51:01 -05'00'

Reuben A. Zepeda
Director of Contracting
Network Contracting Office (NCO) 16

Date

d. **VHA RPO 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 (if over $90 million) or approve ($900K to $90 million) for other than full and open competition.

DARYL BERG

Digitally signed by DARYL BERG
Date: 2026.07.17 08:48:29 -05'00'

07/17/2026

Daryl A. Berg
Executive Director, RPO Central
Head of Contracting Activity

Date

Attachment 1: VHA Streamlined Market Research and Acquisition Planning Report

Requirement Title: Michael E DeBakey VA Medical Center
Houston Psychiatry Services – Emergency Sole Source Bridge

In accordance with FAR 7.102, contracting officers and acquisition planners are required to perform acquisition planning and conduct market research. The following information is a summary of the acquisition planning: In submitting this request for procurement, the customer considered available sources within the agency, any government-furnished information/property, and security considerations IAW VA Handbook 6500.6. The contract type for this procurement is Firm Fixed and the milestone schedule will be accomplished and documented in the Electronic Contract Management System (eCMS). The information below summarizes the market research results for this requirement.

1. Objective: Per FAR 10.001(a)(2), VAAR 810.001-70, and VAAM M810.002-70 this report is in support of (check as many as apply):

- ☐ A new requirement
- ☒ An acquisition with an estimated value in excess of the simplified acquisition threshold (see FAR subpart 2.1 for current threshold) (Utilize Attachment 2: Market Research Report Template if action is over the $9 million)
- ☐ An acquisition with an estimated value less than the simplified acquisition threshold where adequate information is not available to develop the requirements package and the circumstances justify the cost of performing the market research. If so, explain
- ☐ An acquisition that could lead to a bundled contract (15 U.S.C. 644(e)(2)(A)) (see FAR subpart 2.1 for bundled contract definition);
- ☐ Other:

2. Background:

a. Description of service/supplies being requested: Psychiatry Services for Michael E DeBakey VA Medical Center (MEDVAMC) and/or its nine (9) Community Based Outpatient Clinics (CBOC(s)) and two (2) future outpatient clinics (illustrated below).

(9) CBOCs:
• Beaumont VA Outpatient Clinic (BOPC) at 3420 Veterans Circle,

Beaumont, Texas 77707 in Jefferson County
• Charles Wilson VA Outpatient Clinic (CWOPC) at 2206 North John Redditt
Drive, Lufkin, Texas 75904 in Angelina County
• Conroe VA Outpatient Clinic (COPC) at 690 S Loop 336 W, Conroe, Texas 77304 in Montgomery County
• Galveston VA Outpatient Clinic (GOPC) at 3828 Avenue N, Galveston, Texas 77550 in Galveston County
• Katy VA Outpatient Clinic (KOPC) at 750 Westgreen Boulevard, Katy, Texas 77450 in Harris County
• Lake Jackson VA Outpatient Clinic (LJOPC) at 208 Oak Drive South, Lake
Jackson, Texas 77566 in Brazoria County
• Richmond VA Outpatient Clinic (ROPC) at 22001 Southwest Freeway, Suite 200, Richmond, Texas 77469 in Fort Bend County
• Texas City VA Outpatient Clinic (TXOPC) at 9300 Emmett F. Lowry Expressway, Suite 206, Texas City, Texas 77591 in Galveston County
• Tomball VA Outpatient Clinic (TOPC) at 1200 W. Main Street, Tomball, Texas 77375 in Harris County

(2) Outpatient Clinics (micro)
• Site A: Future location and address to be determined (Greater Houston Area)
• Site B: Future location and address to be determined (Greater Houston Area)

b. Product or Service Code: Q519 Behavioral and Mental Health

c. NAICS Code: 561320 – Temporary Help Services

d. Size Standard for NAICS: $34.0 Million

e. Estimated contract value (to include any option years): $1,412,476.00 (6 months)

3. Market Research Methods/Techniques/Sources: In accordance with FAR Part 10, VAAR 810, and VAAM M810 market research has been conducted for this acquisition. The following techniques were used and the timeframes/date of the research (check as many as apply):

☒ Used Veteran Small Business Certification (VetCert) database to identify certified capable SDVOSBs and VOSBs. Resulted in 4,484 – See attached. This urgent short-term bridge requirement is critical to prevent a service gap. The Government will continue to conduct thorough market research to identify any market changes that could facilitate future competitive actions, all while ensuring uninterrupted service.

☐ Applying personal knowledge in procuring supplies/services of this type.

☒ Contacting knowledgeable individuals in Government and industry regarding market capabilities to meet requirements. Knowledge from the COR

☒ Reviewing the results of recent market research undertaken to meet similar or identical requirements. Reviewed Market Research from Contract 36C25621C0013

☐ Publishing formal requests for information in appropriate technical or scientific journals or business publications.

☐ Querying the Government-wide database of contracts and other procurement instruments intended for use by multiple agencies available at www.contractdirectory.gov and other Government and commercial databases that provide information relevant to agency acquisitions.

☐ Participating in interactive, on-line communication among industry, acquisition personnel, and customers.

☐ Obtaining source lists of similar items from other contracting activities or agencies, trade associations or other sources.

☐ Reviewing catalogs and other generally available product literature published by manufacturers, distributors, and dealers or available on-line

☐ Conducting interchange meetings or holding pre-solicitation conferences to involve potential offerors early in the acquisition process.

☐ Conducting market survey:

☐ Other:

4. Nonmanufacturer Rule (NMR) Findings (if the acquisition is for manufactured products or other supplies). Nonmanufacturer means a concern, including a supplier, that provides an end item it did not manufacture, process, or produce. (See the Nonmanufacturer Rule Decision Tree to assist with this determination): Not Applicable. This requirement is for healthcare services.

5. Limitations on Subcontracting (LOS): The purpose of the LOS rule is to ensure small businesses do not serve as "pass-throughs" for large entities. LOS is applicable for all contracts awarded on a set-aside or sole source basis under the Veterans First Contracting Program (VFCP) and requires that VA ensure subcontracts are awarded to SDVOSBs/VOSBs. The rule places limits on the amount that can be subcontracted (e.g., 50 percent for services; reference FAR 52.219-14), ensuring that the small business has to perform some amount of meaningful work, so they don't simply serve as pass-throughs. See the list of services/construction projects that are considered VA LOS High-Risk Areas of Concern and state any concerns to consider with this procurement if any: N/A

6. Market Research Findings: The anticipated cost will be deemed fair and reasonable, as Millbrook Support Services has been successfully providing these services under contract 36C25621C0013, where their pricing has already been established as fair and reasonable. Millbrook Support Services has committed to maintaining their current pricing for Psychiatry Services if awarded the sole source bridge contract. This ensures not only continuity of care but also cost efficiency, making this emergency bridge contract both a practical and fiscally responsible solution.

7. Customary Commercial Practices/Standards: N/A

8. Market Price: $271.63 Per Hour

9. Acquisition History: 36C25621C0013

10. Buy American Statute: The Buy American law restricts the purchase of supplies, that are not domestic end products, for use within the United States. Provide the following information on requests for supplies/products: Not Applicable (N/A). This requirement is for healthcare services

    a. Where is the item manufactured: **N/A**

    b. What company manufactures the item: **N/A**

    c. Provide a list of Authorized distributors: **N/A**

d. Are there equivalent domestic end products available from a US manufacturer for the product/supplies: **N/A**

If requesting a product that is not manufactured in the US, visit the Buy American Act (BAA) & Trade Agreements Acts (TAA) SharePoint site for information on the exceptions to the Buy American Act and the process for a Buy American Nonavailability Waiver. The site also has templates, tools and resources to determine the applicability of Buy American Act, Trade Agreements Act, or exception to Buy American Act (i.e., the Buy American Decision Tool Clause and Provision Selection, regulatory references, etc.).

11. Other pertinent information (e.g., certifications/licenses required to perform the work): Current license to practice medicine in any State, Territory, or Commonwealth of the United States or the District of Columbia, currently certified in Basic Life Support (BLS), and Credentialing and privileging is to be done in accordance with the provisions of VHA Handbook 1100.19

The following sources, to include size and socioeconomic status (suggest a minimum of two for open market requirements and three for FSS requirements) appear qualified and interested to fulfill this requirement:

Firm 1: Gilchrist Global Strategies
Firm 2: SolVet Services, LLC
Firm 3: Marquis Solutions, LLC

Only the incumbent can meet the immediate requirement without delay.
Millbrook Support Services
36 Maple PL
Manhasset, NY 11030
SAM number: E2UBKGNNGCX7

Minimal market research was conducted for this action due to the critical need to prevent a break in service. Given the urgent need, a short-term bridge contract was determined to be the most viable option to guarantee that essential Psychiatry services continue seamlessly, ensuring no disruption in care for our veterans.

PREPARED BY: NCO 16 - Medical Sharing

NAME: Sheliah Saunders

DATE: 7/15/2026

12. Contracting Officer Responsibilities:

a. Based on the above information, the basic clauses and provisions prescribed in FAR Part 12:

☒ Are sufficient for use in this acquisition and do not require any tailoring to be consistent with industry's commercial practices.

☐ Require tailoring to be consistent with industry's commercial practices as noted below. All such tailoring will be included in the solicitation issued for the required supplies/services.

- Identify affected clause/provision paragraph and your recommended change(s); and ☐

☐ The item/service requested is non-commercial.

b. When applicable, state if requirement is suitable for Use of Performance-Based Acquisition (PBA) (FAR 37.6)? and if yes, and PBA is not being used, provide rationale for not using PBA: PBA is suitable.

c. Identify any IT involvement. (Note: Requires CIO or Designee review/approval and/or coordination with Information Security Officer.) Describe administrative, technical, and physical safeguards to protect Government data, facilities, and networks. Currently, contractors and their personnel shall be subject to the same Federal laws, regulations, standards, and VA policies as VA personnel, regarding information and Information System Security (see FAR 7.105(b)(18)): N/A

d. Recommendations: Although other potential sources are available, continued use of Millbrook Support Services is necessary to ensure uninterrupted Psychiatry services for MEDVAMC. Millbrook Support Services is already trained, familiar with facility needs, and already integrated into existing operations. The follow-on contract solicitation has been protested and cannot be awarded until the protest is resolved. Transitioning to a new contractor during this period would create unacceptable risk of delays or service gaps. Millbrook Support Services' pricing has been reviewed and determined to be fair and reasonable for the required services. Maintaining Millbrook Support Services is therefore the most practical and beneficial option to ensure continuity and protect patient care. It is recommended to award Millbrook Support Services, a large business contractor, to avoid any gap in services.

Name: STEPHANIE KEO Digitally signed by STEPHANIE KEO Date: 2026.07.15 16:10:37 -05'00' **Date:** _____

Contracting Officer Signature

Back to results

Market Insights

Small business SBA certified as **SDVOSB**, and designated small in NAICS code(s) **561320**.

July 15, 2026 3:55 PM CDT

SBA certifications

Certification type	Number of small businesses
8(a) or 8(a) Joint Venture	97 View list
HUBZone	87 View list
Women-Owned Small Business (WOSB)	229 View list
Economically-Disadvantaged Women-Owned Small Business (EDWOSB)	92 View list
Veteran-Owned Small Business (VOSB)	2240 View list
Service-Disabled Veteran-Owned Small Business (SDVOSB)	2244 View list

Business type and self-certifications

Small businesses attested to these ownership traits when registering with SAM.gov. These attestations are not vetted by SBA.

Economic group	Number of small businesses
Self-Certified Small Disadvantaged Business	1640 View list

Economic group	Number of small businesses
Self-Certified Veteran-Owned Small Business	2169 View list
Self-Certified Woman-Owned Small Business	379 View list
Self-Certified Woman-Owned Small Business Joint Venture	18 View list
Self-Certified HUBZone Joint Venture	7 View list
Community Development Corporation (CDC) Owned Small Business	14 View list
Native American Owned	26 View list
Tribally Owned Small Business	0
American Indian Owned Small Business	27 View list
Alaskan Native Corp (ANC) Owned Small Business	1 View list
Native Hawaiian Org (NHO) Owned Small Business	2 View list

Memorandum

Department of Veterans Affairs

Date: June 25, 2026
Subj: Independent Government Cost Estimate (IGCE) for _On-Site Psychiatric Services
From: Sarah Browne, Mental Health Care Line Administrative Deputy (1116MHCL)
To: Contracting Officer

1. ***Description of Services:*** *The* Contractor shall furnish 5 FTE personnel to provide services necessary to perform onsite Board-Certified/ Board-Eligible Psychiatry Services to eligible beneficiaries of the Department of Veterans Affairs (VA), Michael E. DeBakey Veterans Affairs Medical Center (MEDVAMC) and/or its CBOCs.
2. ***Procurement Type:*** *Emergency Sole Source to Millbrook Support Services*
3. ***Reimbursement Method:*** *Hourly per FTE*
4. ***Estimated Cost:*** *5.0 FTE $271.63 for 6* months. For a 6-month estimate, the total would be $1,412,476.00

Period of Performance (POP)- July 18, 2026 – January 18, 2027	
FTE 1 =26 weeks/40HR per week x rate $271.63= $282,495.20 FTE 2 =26 weeks/40HR per week x rate $271.63= $282,495.20 FTE 3 =26 weeks/40HR per week x rate $271.63= $282,495.20 FTE 4 =26 weeks/40HR per week x rate $271.63= $282,495.20 FTE 5 =26 weeks/40HR per week x rate $271.63= $282,495.20	**Interim contract to cover gap in services** **Please see line-item attachment below** **Total for 5.0 = $1,412,476.00**

5. **Detailed Basis of Estimate:**
*Please include below, or on a separate worksheet, a detailed explanation (**including all calculations)** utilized to develop the IGCE. The IGCE should include all applicable cost elements for each applicable LIN and any escalation applied to estimate the option periods.*

Basis for Quantities:

	Base Quantity
LIN 0001	*5200*

LIN 0001: Estimated Unit Rate: $271.63 /hour x Quantities from above = $1,412,476.00
Basis for Estimated Unit (hourly) rate: The basis of estimate is derived from the current hourly rates being paid to the incumbent contractor for the required specialty services. These rates represent the most accurate and reliable cost information available, as the incumbent is already performing the work under comparable conditions and in the same geographic area. No rate increases have been applied for the emergency requirement. The estimated hours reflect the

operational needs of the position and account for the specialty-specific duties required to maintain continuity of services. *Contract 36C25621C0013 was used for the estimate.*

6. **Market Research:** Market research for the IGCE consisted of evaluating the incumbent contractor's existing contractual rates, which serve as the most relevant benchmark for determining expected costs. During the solicitation phase for a new competitive contract, a protest was filed, preventing award and necessitating a sole-source emergency procurement to avoid a lapse in service. As a result, the emergency action relies on the incumbent's current rates, with no increases applied, ensuring uninterrupted delivery of essential services.

7. I certify that I have conducted the appropriate market research and analysis in developing the Independent Government Cost Estimate (IGCE) for these services and that the IGCE is not based on contractor's cost/price estimate.

SARAH BROWNE Digitally signed by SARAH BROWNE
Date: 2026.07.15 12:34:52 -05'00'

Program Manager/COR Signature Date

(✓) *This IGCE has been reviewed and is found to be adequate to support the procurement.*

( ) *This IGCE has been reviewed and is found NOT to be adequate to support the procurement. The findings are attached and is being returned to program official for revision.*

STEPHANIE KEO Digitally signed by STEPHANIE KEO
Date: 2026.07.15 13:03:36 -05'00'

Contracting Officer Signature DATE