DEPARTMENT OF VETERANS AFFAIRS

Justification for Single Source Awards IAW FAR 13.106-1
For
Over Micro-Purchase Threshold but Not Exceeding the Simplified Acquisition Threshold

Acquisition Plan Action ID: 36C247-26-AP-0619

1. **Contracting Activity:** Department of Veterans Affairs, VISN 07, Charlie Norwood VA Medical Center. 2237: **509-26-1-5934-0004**

2. **Brief Description of Supplies/ Services required and the intended use/Estimated Amount:** The requirement is for the Architect/Engineer of Record to provide Construction Period Services (CPS) and conduct periodic site visits throughout the construction phase. These services include providing written submittal review comments and issuing approvals or rejections; offering interpretations and clarifications of the construction documents, including preparation of supplemental drawings and specifications as needed; reviewing and responding to RFIs; analyzing proposed change orders and cost adjustments; and documenting site visits with reports detailing observations, deviations, and recommended corrective actions. The A/E will also prepare and submit final signed and sealed Record Drawings in both AutoCAD and PDF formats to reflect the completed construction. These services are necessary to ensure the work is completed in accordance with the approved design, technical requirements, and applicable codes. The estimated value of this requirement is $48,000.00.

3. **Unique characteristics that limit availability to only one source, with the reason no other supplies or services can be used:** Pursuant to 38 U.S.C. 8127(b), the Government may award to a verified SDVOSB/VOSB using other than full and open competition for procurements under the SAT. In accordance with FAR 6.302-5(c)(2)(ii), 6.303, 6.304, and VHAPG Part 819.7008/7009, this justification documents the need to limit competition to a single SDVOSB A/E firm. The proposed A/E firm is the Architect/Engineer of Record (AOR/EOR) responsible for the 100% design documents and holds the associated professional liability, design intent, and sealed life-safety/code compliance determinations. This firm also controls the native design models, calculations, and proprietary project data necessary for construction-phase design support. Substituting another A/E would require revalidation of sealed design elements, risk inconsistencies in code interpretation, disrupt coordination with Authorities Having Jurisdiction (AHJs), and introduce significant schedule and cost risks. Due to the technical complexity of the healthcare environment, and the need to maintain continuity with the original design professional, only the A/E of Record can provide the required services without compromising safety, compliance, or mission execution.

4. **Description of market research conducted and results or statement why it was not conducted:** Market research was not conducted for this requirement because the action is being processed under the statutory authority of 38 U.S.C. 8127(b), which permits the use of other than full and open competition for awards to verified SDVOSB/VOSB firms under the Simplified Acquisition Threshold (SAT). In accordance with FAR 6.302-5(c)(2)(ii) and VA policy in VHAPG 819.7008/7009, competition is not required when awarding a sole source contract to an eligible SDVOSB/VOSB under this authority. Additionally, the requirement can only be met by a single SDVOSB A/E firm—the Architect/Engineer of Record responsible for the 100% design documents—due to their unique technical knowledge, design ownership, and professional responsibility for the sealed documents. Because the availability is lawfully limited to a single eligible source under the SDVOSB sole source authority and only the A/E of Record can provide the required services, further market research would not yield additional qualified or viable alternatives.

5. **Contracting Officer's Certification:** Purchase is approved in accordance with FAR 13.106-1(b). I certify that the foregoing justification is accurate and complete to the best of my knowledge and belief.

KENYON DULANEY
Digitally signed by KENYON DULANEY
Date: 2026.06.25 11:58:08 -04'00'

Name _____ Date _____
Title