DEPARTMENT OF VETERANS AFFAIRS

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

Acquisition Plan Action ID: 36C262-26-AP-6401

1. **Contracting Activity:** The Department of Veterans Affairs (VA), Veterans Integrated Services Network (VISN) 22, New Mexico VA Health Care System (NMVAHCS) is the requiring activity. This acquisition is executed by the Network Contracting Office (NCO) 22. The Purchase Requisition (PR) numbers are 501-26-3-081-0182.

2. **Nature and/or Description of the Action Being Approved:** This procurement is for teleradiology interpretation services and is conducted in accordance with Revolutionary Federal Acquisition Regulation Overhaul (RFO) 12 Acquisition of Commercial Products and Commercial Services. In accordance with RFO 12.102, Restricting Competition for the acquisition of Commercial Products and Commercial Services requires justification using the format as described in RFO 6.104-1.

   This bridge action is necessary to maintain continuity of operations and patient care during the transition to the VISN-wide long-term acquisition strategy. Any interruption in services would adversely impact NMVAHCS ability to provide timely diagnostic imaging and healthcare support to Veterans.

   NMVAHCS requires a contractor to provide board certified and/or board eligible Radiologists to perform teleradiology interpretation services. These services are necessary to ensure the continued availability of critical healthcare support, including diagnostics imaging coverages for Veterans, while the VISN-wide long-term acquisition remains development and procurement. This action represents a continuation of essential teleradiology services necessary to maintain uninterrupted diagnostic imaging support and continuity of care until the follow-on acquisition is awarded and implemented.

3. **Description of Supplies/Services Required to Meet the Agency's Needs:** The Government requires contracted teleradiology interpretation services to provide STAT, emergent, and routine diagnostic imaging coverage for NMVAHCS. Services include after-hours, weekend and all federal holiday coverage, as well as overflow support during normal business hours when on-site radiologist capacity is exceeded.

   The contract physician(s) shall be responsible for providing, including, but not limited to; General Radiologic Procedures (Plain Film, X-ray), Computed Tomography Scans/ Computerized Axial Tomography (CT/CTA Scan), Magnetic Resonance Imaging/Magnetic Resonance Imaging (MRI/MRA), Nuclear Medicine (NM) and Ultrasound (US) including Vascular Ultrasound (Doppler/Duplex) Exams. The NMVAHCS Radiology Department follows the standards and guidelines set forth by American College of Radiology (ACR).

Therefore, the contractor providing teleradiology services shall provide services consistent with The Joint Commission (TJC) and that meet or exceed VA and the ACR guidelines.

NMVAHCS continues to experience significant radiologist staffing shortages and reliance on supplemental National Teleradiology Program (NTP) that is no longer able to meet the facility's demand. Existing staffing constraints have reduced available interpretive capacity and increased the risk of delayed report turnaround times for urgent, emergency, and routine diagnostic imaging examinations. Continued contractor support is necessary to maintain timely access to radiology interpretation services and ensure uninterrupted healthcare operations.

These services are authorized under Title 38 United States Code (USC) 8153 and VA Directive 1663. The extended period of performance is June 01, 2026 through November 30, 2026 for an estimated total of $896,312.50.

4. **Statutory Authority Permitting Other than Full and Open Competition:** RFO 12 Procedures for Acquisition of Commercial Products and Services. The statutory authority for applying the Simplified Procedures for Acquisition of Commercial Products and Services of RFO 12.201-1 is 41 U.S.C. § 1901 and is implemented by RFO 12.102(b) for restricting competition on this procurement. **Competition is restricted on this procurement for the reasons below**:
   - (X) Only One Responsible Source and No Other Supplies or Services Will Satisfy Agency Requirements
   - ( ) Unusual and Compelling Urgency
   - ( ) Industrial Mobilization, Engineering, Developmental or Research Capability or Expert Services
   - ( ) International Agreement
   - ( ) Authorized or Required by Statute
   - ( ) National Security
   - ( ) Public Interest

5. **Demonstration that the Contractor's Unique Qualifications or Nature of the Acquisition Requires the Use of the Authority Cited Above (applicability of authority):** VetMed Group, a Service-Disabled Veteran-Owned Small Business (SDVOSB), has an extensive experience, proven experience delivering nationwide teleradiology support for multiple VA Medical Center (VAMC). Their established performance history with VA facilities, combined with demonstrated familiarity with VA-specific workflows, credentialing, and technical compliance requirements, makes VetMed uniquely qualified to continue providing uninterrupted teleradiology services during the extended period of performance.

   VetMed currently processes approximately 1,900 studies per day across their VA portfolio, with roughly half being emergency-level cases. Their ability to manage high-volume and high-acuity caseloads while maintaining reliable turnaround times has been demonstrated repeatedly in demanding environments. They utilize secure and VA complaint technology including Intel PACS, Mirth, and Fluency for Imaging, which fully align with VA data protection standards. In addition, VetMed has a VA-approved National IT Memorandum of Understanding (MOU) in place, further ensuring that their technology and security measures align with federal

standards. This compliance is critical to maintain patient data integrity and minimizing service disruptions. VetMed guarantees 100% uptime capability, and rapid response to technical issues through their National IT Control Desk. These established capabilities are already operational within the VA environment and support uninterrupted continuation of services during the extended period of performance.

VetMed employs roughly 50 radiologists who are already credentialed with multiple VA sites. This established workforce enables continuity of operations without delays typically associated with transitioning to a new contractor, including credentialing, privileging, onboarding, and system-access requirements. Their radiologists are highly specialized in areas such as neuro, breast, and thoracic imaging, and their familiarity with VA hospitals further supports their qualifications. Most of contractor's radiologists anticipated performing teleradiology services for NMVAHCS will already be credentialed with other VAMC. Therefore, credentialing will be efficient. The company has been accredited by The Joint Commission since 2020 and has maintained strict adherence to HIPAA and VA-specific regulations. Their strong compliance record and internal peer review processes meet or exceed ACR guidelines, which further ensure quality and accountability in their service delivery.

Based on its demonstrated performance, established infrastructure, credentialed workforce, and existing operational integration within the VA environment, VetMed remains the only responsible source capable of providing uninterrupted services during the extended period of performance while transition-related delays and performance risk.

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):** Since award of the initial bridge action, the VISN-wide acquisition has continued to progress through and is currently anticipated [redacted].

   This extension is intended solely to maintain continuity of critical teleradiology services until the follow-on acquisition is awarded and transitioned into performance. The requested period of performance is limited to the minimum duration necessary to support continuity of operations and patient care during completion of the long-term procurement.

   The Government's long-term strategy remains the VISN-wide acquisition. This action does not replace that acquisition effort and is not intended to satisfy the requirement beyond the period necessary to complete award and transition activities associated with the follow-on contract.

7. **Determination by the CO that the Anticipated Cost to the Government will be Fair and Reasonable:** In accordance with RFO 12.204 (a), the Contracting Officer (CO) determined that the price for this requirement is fair and reasonable. This determination is based on a review of the proposed rates, historical pricing for similar services, the Independent Government Cost Estimates (IGCE), and available market information for comparable healthcare services. The proposed pricing reflects rates previously determined fair and reasonable and remains consistent with current market conditions.

8. **Description of the Market Research Conducted and the Results, or a Statement of the Reasons Market Research Was Not Conducted:** As described in Section 6 above, market research was conducted in accordance with RFO 10. This action represents a temporary continuation of services necessary to maintain continuity of operations and patient care while the VISN-wide acquisition is completed. The long-term requirement remains subject to a acquisition strategy, and industry has been notified of the pending procurement through appropriate acquisition planning and market research activities.

   This acquisition does not apply to Buy American Act (BAA) and Trade Agreements Act (TAA) because NMVAHCS is not requesting for products or materials subject to BAA or TAA requirements. This acquisition is for acquiring qualified Radiologists providing teleradiology services.

9. **Any Other Facts Supporting the Use of Other than Full and Open Competition:** None.

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

    Name: VetMed Group LLC
    Address: 393 NE 5th Avenue, Unit B
    DelRay Beach, FL 33483

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**: The long-term strategy for this requirement is currently under development and anticipated [redacted]. To enhance competition for future requirements, the Government will continue to conduct market research, engaging industry through public notices and acquisition planning activities, and identifying qualified sources capable of meeting VA credentialing, privileging, cybersecurity, and operational requirements. The Government will also continue evaluating opportunities to expand vendor participation in future competitive acquisitions while maintaining continuity of critical healthcare services for Veterans.

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 included in the justification, are accurate and complete to the best of my knowledge and belief.

    Signature: [redacted] 5 -06'00' ___
    [redacted]
    Radiology Department, NMVAHCS

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.

Signature: [redacted] _____ -07'00' ____
[redacted]
Contracting Officer
Network Contracting Office - 22

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.

Signature: [redacted] _____ ____
[redacted]
Contracting Officer, [redacted]
Network Contracting Office - 22