

ATTACHMENT VAAM M807- C
Consolidation Determination and Findings

Grounds Maintenance Services for
Los Angeles National Cemetery
950 S Sepulveda Blvd, Los Angeles, CA 90049

FINDINGS

I. INTRODUCTION.

Department of Veterans Affairs National Cemetery Administration (NCA) plans to solicit offers for Grounds Maintenance Services (GMS) for the Los Angeles National Cemetery and has conducted market research that demonstrates consolidation of this procurement to be both necessary and justified.

II. BACKGROUND.

A. Scope of requirement. Contractor will be responsible for full GMS to include but not limited to headstone maintenance, turf maintenance, mowing, trimming, edging, power washing, irrigation system management/maintenance, drainage system maintenance, tree & shrub pruning, and gravesite maintenance.

B. Procurement history. Full GMS the Los Angeles National Cemetery were performed by two separate contracts for two areas of the Los Angeles National Cemetery (LANC). The reason for two separate contracts was due to the cemetery's past expansion project (i.e. Columbarium Expansion Project), which was completed in 2020 and the timing of its completion, it was prudent then to award a separate contract for that area of the cemetery. The control of the land was realigned to the LANC on April 1, 2015, by the West Los Angeles Healthcare Center (WLAHC). However, as concluded during the acquisition planning, the next base year plus four option years solicitation must include the newly added expansion along with the current area of the cemetery (i.e. Historic cemetery). Contract history demonstrates, Contract no. 36C78622C0050, performed by Severson, covered the Historic cemetery at LANC, which is located at 950 S. Sepulveda Blvd., Los Angeles, CA 90049. Contract no. 36C78620D0018, performed by Moderno Inc., was for GMS services at the Columbarium section at LANC, which is located at Constitution and Davis Avenues, Los Angeles CA 90049. Contract No. 36C78622C0050 expired on 09/29/2023 and Contract No. 36C78620D0018 expired on 03/31/2024. Currently, there is a bridge contract in place for each of the two referenced locations. The current bridge IDIQ contracts are: 36C78625D50333, performed by Severson (SDVOSB), for the LANC (Historic cemetery); and Contract No. 36C78625D50334, performed by Moderno Inc. (SDVOSB) for LANC (Columbarium section).

C. Contract type. NCA is seeking a firm-fixed price indefinite delivery, indefinite quantity (IDIQ) contract for one base year and four (4) one-year options. The Contracting Officer (CO) plans to compete the requirement as a 100% set-aside for SDVOSBs. The independent government cost estimate (IGCE) for all five (5) years is \$8,524,601.10, and the NAICS code for this requirement is 561730, Landscaping Services, with a Small Business Administration (SBA) size standard of \$9.5M.

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D. Applicable Statutes/ Regulations. This determination is issued pursuant to Federal Acquisition Regulation (FAR) 7.107-2(a), that consolidation is necessary and justified for this acquisition.

E. Market Research. Market research has been conducted has demonstrated that Consolidation is necessary and justified. Market research was conducted using the following techniques:

- a. A review of acquisition history
- b. Query of VetCert (<https://veterans.certify.sba.gov/>)
- c. Sources Sought Notice on SAM.gov

The VetCert query resulted in over two thousand (2,056) SDVOSBs/VOSBs who have the NAICS 561730 to provide the required services. A Sources Sought Notice was posted on SAM.gov and seven (7) responses were received: seven (7) SDVOSBs. Based on implementation of VAAR Subpart 819.70, The VA Veterans First Contracting Program, which dictates that if there are two (2) or more SDVOSBs/VOSBs that can fulfill the requirement, then the requirement shall be set-aside. The CO has determined there is a reasonable expectation to receive two or more proposals from capable SDVOSBs.

Notifications.

☒ VA Small Business Specialist and local Small Business Administration (SBA) procurement center representative (PCR) (see [FAR 10.001\(c\)\(1\)](#)). The Contracting Officer contacted NCA's small business specialist and the local SBA PCR.

☐ Affected incumbent small business concerns (see [FAR 10.001\(c\)\(2\)](#)). N/A – this procurement will not involve bundling; however, notification will be made to the public IAW FAR 7.107-5(c).

III. CONSOLIDATION.

A. Benefits/Mission success. The anticipated financial benefits do not meet the dollar thresholds stated in FAR 7.107-2(d)(1). However, the expected benefits not quantifiable in dollar amount are critical to the agency's mission success and this procurement strategy provides for the maximum practicable participation by SDVOSBs.

Cemetery expansions are authorized per NCA Directive 3001 (encl), dated 10/10/2024, and should not be considered separate requirements/locations. Cemetery expansions are a typical occurrence at NCA cemeteries. Consolidating these two requirements would bring the two areas of the cemetery, Historic and Columbarium, under one contract, which would be the natural progression for cemetery expansions.

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Separation of the requirements would be inefficient and increase the risk of interruption to the services provided to our veterans and their families. Multiple contracts would require additional labor coordination beyond existing staffing of this facility and increase the risk of shrine standard violations at the cemetery. COR and contracting staff resources are limited. Multiple contracts are unnecessary since the Columbarium area is part of the Los Angeles cemetery. Cemetery expansions are a normal occurrence at NCA cemeteries. It would be unnecessarily burdensome if each expansion were assigned its own contract. Some expansions can be as little as three acres.

Ultimately, having one solicitation and award will save the Government labor and time. It would reduce the number of hours and effort expended on multiple technical and legal reviews, as well as contract administration. It would also reduce the undue burden on Cemetery staff, namely the COR who has other duties to perform associated with Cemetery's operations.

Therefore, the CO believes awarding a single IDIQ for the two areas of the cemetery allows for proper monitoring of the contract required by acquisitions standards, which is critical to the agency's mission success.

- B. Procurement strategy.** The Contracting Officer has determined to compete the requirement using FAR 15 procedures as a 100% set-aside for SDVOSBs based on market research results.
- C. Alternative approaches.** An alternative approach is to keep the requirements on separate contracts and award a separate contract every time the cemetery experiences a cemetery expansion. As previously stated, proceeding with this approach would increase the risk of multiple contractors on site. Having separate contractors for each area of a cemetery (i.e. an expansion area) has required resources that are beyond the existing staff levels at the cemetery and would increase the risk of not providing seamless service for our Veterans and their families.
- B. Negative impact.** No negative impacts on small business concerns have been identified as the proposed acquisition strategy is for a 100% SDVOSB set-aside. A sources sought notice published to SAM.GOV Contract Opportunities and seven (7) SDVOSBs responses were received. No concerns were received about the planned solicitation combining both areas of the cemetery. Furthermore, the NCA Contracting Services office has the highest SDVOSB participation percentage in the VA as communicated by VA OSDBU.
- C. Inclusion of small business concerns.** IAW VAAR 819.201, it is VA policy that small business concerns owned and controlled by veterans shall have maximum practicable opportunity to participate in VA acquisitions, consistent the priorities and preferences prescribed under the Veterans First Contracting Program.

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Additionally, within the VA hierarchy of small business program preferences, VA must consider preferences for verified SDVOSBs first.

Market research was conducted, and results show there is reasonable expectation to receive multiple quotes from SDVOSBs for this requirement. The proposed action is to post a solicitation to SAM.gov as a 100% set-aside for SDVOSBs.

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IV. DETERMINATION.

Based on the above, I hereby determine that in accordance with FAR 7.107-2 (a) that consolidation is necessary and justified.

PREPARED BY: I hereby certify that the supporting information and data used to complete this determination is accurate and complete to the best of my knowledge and belief.

RALPH CRUM Digitally signed by RALPH CRUM
Date: 2025.09.05 14:12:51 -05'00'

Ralph Crum
Contracting Officer

Date

Concur:

KIM HAYWARD Digitally signed by KIM HAYWARD
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Kim Hayward
NCA Small Business Liaison

Date

Concur:

NIJUA HEARD Digitally signed by NIJUA HEARD
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Nijua Heard
SBA Procurement Center Representative (PCR)

Date

Concur:

JULES TCHOUJAN Digitally signed by JULES
TCHOUJAN
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Jules Tchoujan
Senior Director, Acquisition Support, OSDBU

Date

Concur:

RONALD HIRTLE Digitally signed by RONALD HIRTLE
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Ronald W, Hirtle
Head of Contracting Activity, NCA

Date

**JOSEPH
MALETTA** Digitally signed by
JOSEPH MALETTA
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11:57:21 -05'00'

Joseph Maletta
Acting Senior Procurement Executive

Date