



February 24, 2016

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Contract Specialist, Procurement Division C3
Strategic Acquisition Center (SAC)
U.S. Department of Veterans Affairs (VA)
10300 Spotsylvania Avenue, Suite 400
Fredericksburg, VA 22408

Re: VA Medical/Surgical Prime Vendor (MSPV) Catalogue Item Detail Questionnaire

Ms. Lera:

The Coalition for Government Procurement (“the Coalition”) appreciates the opportunity to provide comments on the VA Strategic Acquisition Center (SAC) MSPV Catalogue Item Detail Questionnaire.

The Coalition is a non-profit association of firms selling commercial services and products to the Federal Government. Our members collectively account for a significant percentage of the sales generated through the Federal Supply Schedules (FSS) program, including the medical equipment, supply, pharmaceutical, and service Schedule contracts managed by the VA. Members include small, medium and large business concerns. The Coalition is proud to have worked with Government officials for more than 35 years towards the mutual goal of common sense acquisition.

We appreciate the VA’s outreach to industry on the appropriate categories for products to be included in the MSPV and MSPV-NG Program catalogue. Our members are providing specific feedback on the proposed categories in their RFI survey responses directly to the VA SAC. The following comments represent the consolidated input from our member companies.

Utilizing Existing SIN Structure

The Coalition recommends that the categories created for the MSPV and MSPV-NG programs follow the existing Special Item Number (SIN) structure under the FSS program. Contractors that offer medical equipment, supply, and service contracts for the VA are already familiar with the SIN categorizations and covered products for Schedules 65 II A, 65 II C, 65 II F, 65 V A and 65 VII. Rather than developing entirely new categories that both government and industry will

need to learn and will have to be adjusted over time, it would be much more efficient and effective to use the SIN categories already provided by the FSS program. This approach would address two general observations the Coalition had in reviewing the sample categories in the RFI, 1) duplication and overlap between the proposed categories, and 2) a need for more clarification for some of the categories.

Duplication and Overlap

There are a number of categories that seem to overlap or duplicate other categories. The products within these categories may also be arbitrarily assigned. For example, Equipment Biomedical includes IV hangers and stands and patient procedure and exam furniture, while Equipment Non-Biomedical includes beds, chairs and stools, equipment and accessories, and furniture and fixtures, and IV and Irrigation Supplies includes IV infusion pumps and accessories. Similarly, Equipment Biomedical includes whirlpool and bath therapy, which seems more related to the category OT/Rehabilitation/Aids for Daily Living, which includes OT exercise equipment and bath products, and the separate category, Physical Therapy, which includes PT exercise equipment. Critical Care with its coverage of monitoring catheters seems to overlap with Physiological and Psychological Testing and Monitoring, which includes vital signs monitoring.

Need for Clarification

Other categories need further clarification as to what products they include. For example, for the “Disaster Preparedness & Survival Supplies & Equipment” category, a definition of *disaster preparedness supplies* is needed that explains how these products differ from emergency medical services supplies and equipment. In addition, clarification as to what “optometry” covers and whether the category is limited to diagnostic tools and instruments would be helpful.

Scope

The Coalition recommends that the MSPV and MSPV-NG catalogue items be limited to commodities not covered by other VA contract programs. For example, the sample list of categories in the RFI includes a “Pharmacy” category for pharmacy drugs and supplies. We recommend that this category not be included in the MSPV program given the availability of these products through the already existing VA Pharmaceutical Prime Vendor program. Further, some of the products included in the category sample are already offered under other National Requirements Contracts such as electric hospital beds for home use and patient lifts and slings. Most government mandatory users of these contracts are not permitted to purchase the same or similar items from FSS contracts without a waiver. It is unclear what the added value would be to VA customers if these products were also included in the MSPV program. It is likely more cost effective for the VA if orders for these products go through these already existing contracts.

We also suggest that the scope of items in the MSPV and MSPV-NG Catalogue be limited to consumable commodities that do not require installation or maintenance services. Some

“medical equipment” examples from the Home Medical Equipment (HME) industry include acute care beds and electric beds. Based on the initial installation and periodic maintenance services required to ensure patient safety, the Coalition does not recommend that they be included in the catalogue.

Proprietary items that can only be used with a particular manufacturer’s equipment, if included in the catalog, should indicate that these items can only be used with the manufacturer’s equipment associated with those items and should not be grouped with similar items.

Increased Role of Clinicians

The Coalition recommends that the MSPV program establish a clinically led process with full time clinicians on staff to develop the requirements for the MSPV categories and the program overall. We believe this is critical to ensuring that the program is able to meet the needs of MSPV and MSPV-NG users.

Program Objective

A more general recommendation for the MSPV-NG program is for greater clarification of the program’s purpose; specifically, whether the objective is to create a catalogue of FSS commodities or if the intent is standardization. Also, an explanation as to how the MSPV and MSPV-NG programs differ from the VA Schedules program would be helpful for contractors.

The Coalition sincerely appreciates the opportunity to share our comments in response to the MSPV Catalogue Item Detail Questionnaire. If you have any questions, please contact me anytime at (202) 331-0975 or rwaldron@thecgp.org.

Sincerely,



Roger Waldron
President