

SOLE-SOURCE DETERMINATION MEMO FOR SUPPLIES AND SERVICES

Date: July 8, 2026 **Sole source number:** S-10000-00017359 (6284-0)

To: Kirk N. Rhoades, Designated Procurement Officer
ODHS Office of Contracts & Procurement

Requestor: Amy Shaddon for Heather Lindsey
Agency/division: Vocational Rehabilitation Services ("VR")
Program/office: VR Office of the Director
Contract specialist: Louie Thomas

Agency	Sole source rule:	Sole source authority:
ODHS	ODHS OAR 125-247-0275	OAR 125-246-0170(2) DAS Delegation ODHS Tiered, as amended

Estimated total contract value: \$70,000.00

Description of goods or services:

Data collection, analysis, and final evaluation and performance reports.

VR was originally awarded a grant from the federal Department of Education ("DOE") in October 2021, and "pass-through" Grant 173438 was issued to Cornell University by OCP.

VR has since received an anticipated supplemental from DOE for an additional two year period to support activities in closing out the Project funded by the federal grant. When the amendment request was received, OCP determined that the Work as written into the original Grant Agreement was an incorrect interpretation of the granting requirements. The Work of the final two-years of the Project is being transitioned to a Personal Services Contract.

This sole source seeks to continue the Work of the Grantee as a Contractor through the final two-year completion phase of the Project as was VR's intent since the Project's inception.

1. Background: This sole source justification applies to the purchase of:

VR received Grant Award notice H421C210026 from the US Department of Education on October 1, 2021. Grant agreement 173438 was issued by OCP on November 15, 2021, to Cornell University, and written as a "pass-through" grant.

The Agreement was amended on May 16, 2023 to add language to the "Program Description," fine-tuning the Project work requirements funded by the Grant.

VR has now received an anticipated supplemental from DOE for the additional two year period to support the close-out activities of the Project, including data collection and analysis, and completion of the Project's final evaluation report and final performance report.

The intent has always been for VR to continue with the Project's original Grantee through to its completion, and Program submitted the appropriate amendment request to OCP. Through no fault of the Grantee, it was determined by OCP that the Work as written into the original Grant Agreement did not fit the legal requirements of being "pass-through," nor did it meet any granting requirements in general. The Work of the final two-year close-out period of the Project is now being correctly transitioned to a Personal Services Contract.

This sole source request seeks to continue the Work of the Grantee through the Project's completion phase, to provide data collection, analysis, and to complete the grant's final evaluation report and final performance report.

2. Prospective contractor/vendor:

Legal entity name:	Cornell University, and its Office of Sponsored Programs
Address:	373 Pine Tree Road, Ithaca, New York 14850
Contact person:	Wahiahawi ("Hawi") Fitch
Phone:	(607) 254-3115
Email:	wch46@cornell.edu

Protests are due by 3:00 PM within seven calendar days after the first date the notice is posted on OregonBuys. Protests must be sent via mail to the following address. No other method of receipt will be accepted. Protests via telephone will not be accepted.

Oregon Department of Human Services

Office of Contracts and Procurement

ATTN:	Louie Thomas, Senior Procurement and Contract Specialist		
Address:	500 Summer Street NE E03, Salem, Oregon 97301		
Phone:	(971) 283-4755 (email preferred)	Fax:	(503) 378-4324
Email:	louie.thomas@odhs.oregon.gov		

Agency reserves the right to purchase additional services based on the unanticipated needs of the Project's final close-out activities.

3. Written findings of fact (market research):

The findings below must include factual information supporting the determination that meet the sole source requirement in statute.

Pursuant to ORS 279B.075, Agency must conduct market research that supports the assertion that there is only one source that can provide the goods or services. Market research includes utilization of the internet, trade journals, agency vendor lists, professional organizations, studies, catalogs/industrial periodicals, vendor sources, yellow pages, etc.

Agency must select at least one of the findings and prepare the determination as it specifically relates to the good or service being procured. More than one finding can be addressed. The findings are as follows:

- Pursuant to ORS 279B.075 (2)(c): Provide findings supporting the determination that the goods or services are for use in a pilot or an experimental project.

Oregon's Inclusive Career Advancement Program ("ICAP)," the project supported by the underlying federal grant, is a Career Advancement Initiative Model Demonstration Project that meets the priority requirement to provide access to existing career pathways in Oregon for VR clients. The Project interconnects the supports and services of 17 urban, suburban, and rural community colleges in Oregon, VR, and ODHS' Self-Sufficiency programs.

The Project leverages Oregon's current statewide success in utilizing career pathways for other populations, including integrated education and wraparound support, to advance educational and economic equity for people with disabilities, including those from marginalized populations

- Pursuant to ORS 279B.075 (2)(d): Any other findings that support the conclusion that the goods or services are available from only one source.

At the point in the Project's life-cycle, based on the accumulated knowledge and experience from the Projects inception in 2021, it's both unreasonable – most likely impossible – and fiscally irresponsible for ODHS not to continue with the originating Vendor to provide the Project's close-out activities.

APPROVED:

By:

Signed by DPO electronically via OregonBuys

Kirk N. Rhoades or acting DPO