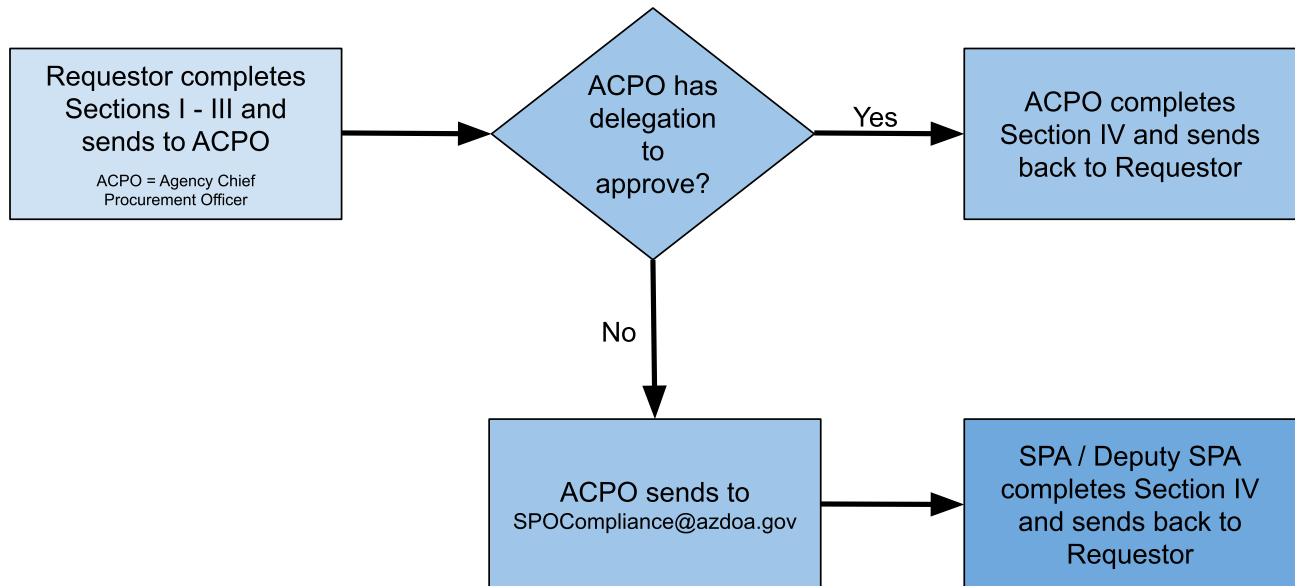


Standard Work

Owner	State Procurement Office, Compliance Unit		
Form Number	SPO Form 101 - Competition Impracticable Authorization	Version	Revised 10/17/23

Process	Standard Work/Instructions for completion and submittal of the SPO 101 form. The form is available on the SPO website: For Agencies > Resources > Standard Forms and Documents .
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Form Completion Process



No.	Action	Action Detail/Key Points
Sections I through III to be completed by the requesting State Governmental Unit:		
SECTION I - State Governmental Unit Request		
1	State Governmental Unit	Name of the requesting State Governmental Unit (SGU; agency, board, or commission)
2	Requestor	Name of the requestor
3	Email	Email of the requestor
4	Title	Job title of the requestor
5	Telephone	Telephone number of the requestor
SECTION II - Background		
6	Service(s)/Material(s)	Description of service(s)/material(s) or Contract title (eProcurement Label)
7	Supplier	Name of supplier(s)
8	Contract ID	eProcurement contract number (if available)
9	CI Type	Select applicable option:
		- Authorization Request for a new CI
		- Modification pursuant to R2-7-E303(E) for a CI modification

10	Requesting Term	Specify contract term or extension period, as applicable, based on the CI
11	Estimated Cost	Forecasted expenditures for the duration of the CI term
SECTION III - Justification		
12	Rationale	Select applicable option in accordance with A.A.C R2-7-E303(A): - Compliance with A.R.S. §§ 41-2533, 41-2534, 41-2538, or 41-2578 is impracticable - Compliance with A.R.S. §§ 41-2533, 41-2534, 41-2538, or 41-2578 is unnecessary - Compliance with A.R.S. §§ 41-2533, 41-2534, 41-2538, or 41-2578 is contrary to public interest - Documented lack of suppliers - Procurement requires an open and continuous availability of offerors
13	Provide details of the procurement need, reason for the competition impracticable, and how the proposed procurement is advantageous to the State	Detail information regarding the rationale selected in the previous section; State Governmental Unit use of the material(s) or service(s); if mandatory state contracts were explored; the limitation which led to the competition impracticable, and how the State would benefit from the procurement. If there is previous contract which requires modification pursuant to R2-7-E303(E) or contract that reached beyond the maximum 5-year term, provide the contract number and copy of that CI.
14	Describe the procurement process, strategy to promote competition, and determination that the price is fair and reasonable	Detail strategy for the proposed procurement, considered competition, reason for selecting specific supplier, and negotiations strategy.
15	I have conducted research and determined that no mandatory state contract is available for the service(s)/material(s)	Check the box confirming research was conducted. If the CI pertains to a modification pursuant to R2-7-E303(E), leave field empty.
16	If needed, I have attached additional documents/clarifications/explanations to the request	Check the box to indicate that there are additional documents attached to the request. Either as separate documents in the original email request or attached directly to the PDF submitted.
17	Signature	Signature of the authorized requestor
18	Date of Request	Specify the date of request
Section IV to be completed by the Procurement Authority:		
SECTION IV - Approval		
19	Determination	Select applicable option in accordance with A.A.C. R2-7-E303(D): - Request Authorized Pursuant to R2-7-E303 - Request Authorized with Conditions/Restrictions R2-7-E303 - Request Returned for Additional Information - Request Denied
20	Approved Expiration Date	Specify the date or term of expiration
21	Comments, conditions, or restrictions (as applicable)	Complete as needed
22	Print Name	Printed name of the approver
23	Title	Job title of the approver
24	Signature	Signature of the approving authority
25	Date of Approval	Specify the date of approval
"STATE GOVERNMENTAL UNIT NOTICE: This is an official written determination in response to a procurement authorization request. A copy of the form shall be maintained by the State Governmental Unit and the State Procurement Office. Upon completion, Requestor shall forward the signed form to the Contract Owner. Contract Owner shall upload the signed approval version of this form in the eProcurement system. If anticipated expenditure is above State Governmental Unit's delegation, forward document to SPOCompliance@azdoa.gov."		
26	Use section as necessary (or attach additional information and check box 16)	Used by any party in case the fields within the form were insufficient

Procurement Determination:
Competition Impracticable Authorization
A.A.C. R2-7-E303

SECTIONS I THROUGH III MUST BE COMPLETED BY THE REQUESTOR
USE ADDITIONAL PAGE AS NECESSARY

SECTION I - State Governmental Unit Request

1. State Governmental Unit

AHCCCS

2. Requestor

Meggan LaPorte

3. Email

meggan.laporte@azahcccs.gov

4. Title

CPO

5. Telephone

602-417-4000

SECTION II - Background

6. Service(s)/Material(s)

Outside Legal Counsel Services

7. Supplier

Coppersmith Brockelman PLC
IV0000045813

8. Contract ID

CTR078912

9. CI Type

- Authorization Request for a new CI

10. Requesting Term

9/30/2025 - 9/30/2026

11. Estimated Cost

\$100,000.00

SECTION III - Justification

12. Rationale

- Compliance with A.R.S. §§ 41-2533, 41-2534, 41-2538, or 41-2578 is impracticable

13. Provide details of the procurement need, reason for the competition impracticable, and how the proposed procurement is advantageous to the State

Provide outside legal representation to AHCCCS.

The list of outside legal counsel contracts has been reviewed. None have been determined to be appropriate due to a lack of specialized expertise in the practice area, and/or conflicts of interest that would preclude representation.

This firm is urgently needed for specific legal counsel and has specialized expertise in state and federal due process, the ADA, and the Administrative Procure Act.

14. Describe the procurement process, strategy to promote competition, and determination that the price is fair and reasonable

All current Contractors for legal counsel have been reviewed for the needed specialized expertise in the required practice area. None have been determined to be appropriate due to a lack of specialized expertise in the practice area, and/or conflicts of interest that would preclude representation.

The pricing is determined to be fair and reasonable in comparison to the fees for firms on State contract and in comparison to the rates for services in the specialized field.

15. I have conducted research and determined that no mandatory state contract is available for the service(s)/material(s) ☒

16. If needed, I have attached additional documents/clarifications/explanations to the request ☐

17. Signature



18. Date of Request

9/30/2025

In accordance with the Procurement Rules, the Arizona Uniform Terms and Conditions must be made a part of all Contracts. If you will be required to sign a software licensing agreement or sign any other agreement containing terms and conditions, these will need additional review to ensure that the terms and conditions do not invalidate the Arizona Uniform Terms and Conditions. Approval of this request does not allow for agencies to exceed their dollar acquisition amount of delegated authority.

TO BE COMPLETED BY PROCUREMENT AUTHORITY

SECTION IV - Approval

19. Determination

- Request Authorized Pursuant to R2-7-E303

20. Approved Expiration Date

9/30/2026 with option to extend as needed

21. Comments, conditions, or restrictions (as applicable)

22. Print Name

David Steuber

23. Title

State Procurement Administrator

24. Signature



25. Date of Approval

09/30/2025

David Steuber (Sep 30, 2025 17:18:02 CDT)

STATE GOVERNMENTAL UNIT NOTICE: *This is an official written determination in response to a procurement authorization request.*

A copy of the form shall be maintained by the State Governmental Unit and the State Procurement Office.

Upon completion, Requestor shall forward the signed form to the Contract Owner.

Contract Owner shall upload the signed approval version of this form in the eProcurement system.

If anticipated expenditure is above State Governmental Unit's delegation, forward document to SPOCompliance@azdoa.gov.

26. Use section as necessary (or attach additional information and check box 16)