



**Office of Audits
Office of Inspector General
U.S. General Services Administration**

IMPLEMENTATION REVIEW OF ACTION PLAN

**Opportunities Exist to Strengthen
the Federal Acquisition Service's
Contracting Officer's Representative
Workforce**

Report Number A130007/Q/A/P14006

September 29, 2014

Assignment Number A160081

August 3, 2016



**Office of Audits
Office of Inspector General
U.S. General Services Administration**

DATE: August 3, 2016

TO: Thomas A. Sharpe Jr.
Commissioner, Federal Acquisition Service (Q)
Susana Bandeira

FROM: Susana Bandeira
Audit Manager, Mid-Atlantic Region Audit Office (JA-3)

SUBJECT: Implementation Review of Action Plan
Opportunities Exist to Strengthen the Federal Acquisition Service's
Contracting Officer's Representative Workforce
Report Number A130007/Q/A/P14006
September 29, 2014
Assignment Number A160081

We have completed an implementation review of the management actions taken in response to the recommendations contained in the subject audit report (see **Appendix A**). The objective of our review was to determine whether the Federal Acquisition Service (FAS) has taken the corrective actions as outlined in the action plan for the audit of *Opportunities Exist to Strengthen the Federal Acquisition Service's Contracting Officer's Representative Workforce*. To accomplish our objective we:

- Examined documentation submitted by FAS supporting completion of the action plan steps;
- Performed limited testing of the implementation of the guidance and procedures contained in these supporting documents; and
- Corresponded with FAS personnel.

Our implementation review found that FAS did not fully implement all of the steps in its action plan, dated May 19, 2015 and partially revised June 15, 2015.¹ As a result, a revised action plan addressing these open recommendations must be submitted within 30 days to this office and the GAO/IG Audit Management Division (H1G).

¹ See *Appendix A, pages 8-9* for FAS's revisions to the original corrective action plan.

If you have any questions regarding this report, please contact me or any member of the audit team at the following:

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On behalf of the audit team, I would like to thank you and your staff for your assistance during this review.

Background

On September 29, 2014, we issued an audit report, *Opportunities Exist to Strengthen the Federal Acquisition Service's Contracting Officer's Representative Workforce*, to FAS. The audit objectives were to determine if: (1) FAS Contracting Officer's Representatives (CORs) are certified, designated, and developed in accordance with the Office of Federal Procurement Policy's Federal Acquisition Certification for Contracting Officer's Representatives program and applicable GSA guidance, and (2) the COR certification program is effectively managed to ensure consistency and transparency.

The audit found:

- FAS is not consistently implementing COR certification program guidance and stated best practices, possibly affecting COR foundational knowledge.
- FAS CORs are not being designated in accordance with COR certification program guidance due to decentralized management and limited system access.
- Lack of training alternatives and sufficient oversight result in underdeveloped CORs.
- Inadequate and unreliable FAS COR data hinders consistency and transparency.

To address the issues identified in the report, we recommended that the FAS Commissioner:

1. Implement a control to ensure that all FAS CORs are accounted for and registered in the Federal Acquisition Institute Tracking Application System (FAITAS).²
2. Develop guidance to ensure the consistent implementation of the Federal Acquisition Certification for Contracting Officer's Representatives program as

² FAITAS is the official system of record for certification and training of all GSA acquisition workforce members (including CORs).

it relates to certifications, to include how regional CORs who report nationally should register in FAITAS.

3. Improve quality, use, and tracking of COR designation letters.
4. Develop a method to quantify and monitor COR workload.
5. Establish: (1) guidelines for evaluating training courses for credit towards Continuous Learning Point achievement requests, and (2) controls to ensure CORs complete FAS-required training courses.
6. Determine if restructuring the Central Office bureau would improve transparency and management of the FAS COR workforce.

The FAS Commissioner agreed with the report recommendations and provided corrective action plans dated May 19, 2015, and June 15, 2015. According to documentation provided by FAS, all corrective action steps were completed by July 14, 2015.

Results

Our implementation review found that FAS did not fully implement 3 of the 13 action steps in its corrective action plan. Specifically, FAS did not complete two action steps requiring all regions and FAS Central Office to complete all of the applicable columns in the consolidated COR Spreadsheet. As a result, there is no assurance that: (1) all contracts assigned to CORs are identified in the COR Spreadsheet; (2) CORs are registered in FAITAS; and (3) the FAS Office of Acquisition Management can properly track and identify all CORs and their contract assignments, contract dollars, and the date of the Delegation Letter. Additionally, FAS did not fully implement an action step to advise the GSA Office of Inspector General “by email of status and of any adjustments in workload assignments 15 days after the end of a quarter.” As a result, a revised action plan addressing these open recommendations must be submitted within 30 days to this office and the GAO/IG Audit Management Division (H1G).

Consolidated COR Spreadsheet

Registration and Identification of CORs in FAITAS

To improve COR management and oversight, the COR certification program requires all CORs to register in FAITAS. The audit found that when COR certification program guidance and best practices are not consistently implemented by FAS bureau managers, certified CORs are at risk of not possessing the appropriate skills, abilities, and competencies necessary to perform their designated duties.

As part of its corrective action for this recommendation, the FAS Office of Acquisition Management provided a consolidated COR Spreadsheet, which would be used to ensure that all CORs are identified and registered in FAITAS, as required by GSA policy.³ The action plan also stated that this spreadsheet will be reviewed quarterly by the FAS Office of Acquisition Management to verify data is maintained by the FAS Central Office bureau manager and the regional bureau managers.

During our implementation review, we requested, and FAS provided, a more recent COR Spreadsheet (dated May 24, 2016) for our examination. Our review of the COR Spreadsheet noted that some regions did not complete all of the applicable columns. For example, we found six instances where the COR was assigned contracts and therefore should have been registered in FAITAS. However, the spreadsheet column indicating whether the CORs were registered was blank. When we questioned FAS officials regarding why the columns were not completed, they stated that they rely on each regional office to provide the information. In addition, they acknowledged that the COR Spreadsheet is not reviewed on a consistent basis by the FAS Office of Acquisition Management. Although we subsequently determined that these six CORs were registered as required, FAS cannot provide assurance that all CORs are identified and/or registered in FAITAS because the spreadsheet is missing key information and not routinely monitored.

COR Workload and Designation Letters

Federal Acquisition Regulation 1.602-2(d) requires CORs be certified in accordance with the COR certification program and designated in writing. CORs serve as the contracting officer's official representative and are granted specific contractual authority. The audit found that the decentralized management of COR workload and limited access to FAITAS information impacts the CORs' ability to assist contracting officers in managing their contracts.

As part of its corrective action plan for this recommendation, FAS implemented Policy and Procedures (PAP) 2015-03, FAS Central Office/Regional BCM/BCLM Guidance, dated May 21, 2015. It contains a COR delegation template and guidance on updating the COR Spreadsheet. According to FAS, the delegation template was developed to improve quality and to ensure consistency by outlining CORs responsibilities. In addition, the COR Spreadsheet "...will be used by Acquisition Management to track and identify all CORs and their contract assignments, contract dollars, and the date of the Delegation Letter...on a quarterly basis."

As previously mentioned, we determined that some regions did not complete all of the applicable columns in the COR Spreadsheet, including "Date of COR Delegation Letter," "Contract Number(s)," and "COR Registered in FAITAS." As such, because COR workload and designation letters are not adequately monitored, it is difficult to determine which CORs are responsible for which contracts. Furthermore, if a COR certificate expires, is revoked, or not obtained within six months of designation, it is

³ GSA Acquisition Letter MV-06-06, Supplement 3

necessary for the bureau manager to know which contract(s) the COR is assigned to in order to notify the appropriate contracting officer. If the contracting officer is unaware of certificate status changes, there is a possibility that uncertified CORs will be responsible for inspection, acceptance, and rejection of contract services.

Email Notification to the Office of Inspector General

The audit determined that FAS's current method of tracking COR workload information was ineffective. The report also concluded that the unreliable and limited data made it difficult to effectively manage the COR program to ensure consistency and transparency within FAS. Management agreed with these findings.

FAS included a column in the COR Spreadsheet requiring bureau managers to list all of the COR's contract assignments. FAS also included a corrective action step to advise the GSA Office of Inspector General "by email of status and of any adjustments in workload assignments 15 days after the end of a quarter" to provide evidence that FAS is monitoring COR workload. However, during our review, we found that FAS did not consistently perform this step.

Conclusion

Our implementation review found that GSA FAS did not fully implement 3 of the 13 action steps in its action plan. As a result, a revised action plan addressing these open recommendations must be submitted within 30 days to this office and the GAO/IG Audit Management Division (H1G).

Appendix A – Action Plan for Report Number A130007/Q/A/P14006

ACTION PLAN

Audit Report Title: Opportunities Exist to Strengthen the Federal Acquisition Service’s Contracting Officer’s Representatives Workforce

**Audit Report Number A130007/Q/A/P14006
September 29, 2014**

Contact Person: [REDACTED]

Audit Report Number/Title	Recommendation Number	Completion Date(s)
A130007	1	November 29, 2015

Recommendation: Implement a control to ensure that all FAS CORs are accounted for and registered in FAITAS.

<u>Step</u>	<u>Action to be Taken Step by Step</u>	<u>Supporting Documentation to be Sent to QB.</u>	<u>Due Date</u>	<u>IG Extended Date</u>	<u>Status</u>
1.	The FAS Office of Acquisition Management will utilize the consolidated Contracting Officer’s Representative Spreadsheet (COR Spreadsheet) to ensure that all CORs are identified. The Spreadsheet will be maintained via Google Docs. The list will identify contracts assigned, contract dollar amounts, date of delegation letters and if the CORs are registered in FAITAS.	Contracting Officer Representative Spreadsheet	March 1, 2015	May 15, 2015	See spreadsheet. Updates done quarterly.
2.	Review and approve 1st completed COR spreadsheet.	Statement from QV	April 1, 2015	June 15, 2015	See spreadsheet. Updates done quarterly.
3.	The FAS Office of Acquisition Management will review the COR Spreadsheet quarterly to verify data is maintained by the FAS Central Office BCM and the Regional BCMS.	Statement from QV	June 1, 2015	August 15, 2015	See spreadsheet. Updates done quarterly.

Appendix A – Action Plan for Report Number A130007/Q/A/P14006 (cont.)

Audit Report Title: Opportunities Exist to Strengthen the Federal Acquisition Service’s Contracting Officer’s Representatives Workforce

**Audit Report Number A130007/Q/A/P14006
September 29, 2014**

Contact Person: [REDACTED]

Audit Report Number/Title	Recommendation Number	Completion Date(s)
A130007	2	November 29, 2015

Recommendation: Develop guidance to ensure the consistent implementation of the Federal Acquisition Certification for Contracting Officer’s Representatives program as it relates to certifications, to include how regional CORs who report nationally should register in FAITAS.

Step	Action to be Taken Step by Step	Supporting Documentation	Due Date	IG Extended Date	Status
1	The FAS Office of Acquisition Management will issue an Instructional Letter (IL) for all FAS BCMs/BCLMs on processing COR certification requests. The IL will also include instructions on how regional CORs who report nationally should register in FAITAS.	Instructional Letter (IL). QV has developed a draft Policy and Procedures (PAP) document instead of an IL.	March 1, 2015	May 15, 2015	See draft PAP.

Appendix A – Action Plan for Report Number A130007/Q/A/P14006 (cont.)

Audit Report Title: Opportunities Exist to Strengthen the Federal Acquisition Service’s Contracting Officer’s Representatives Workforce

**Audit Report Number A130007/Q/A/P14006
September 29, 2014**

Contact Person: [REDACTED]

Audit Report Number/Title	Recommendation Number	Completion Date(s)
A130007	3	November 29, 2015

Recommendation:

Improve quality, use, and tracking of COR designation letters.

Step	Action to be Taken Step by Step	Supporting Documentation	Due Date	IG Extended Date	Status
1	The COR Spreadsheet will be used by Acquisition Management to track and identify all CORs and their contract assignments, contract dollars, and the date of the Delegation Letter (with time period of responsibilities) on a quarterly basis.	Contracting Officer’s Representative Spreadsheet	March 1, 2015	May 15, 2015	Established spreadsheet for IG review
2	The FAS Office of Acquisition Management will develop a CORs delegation template to improve quality and to ensure consistency by outlining CORs responsibilities.	Letter Template QV has included the template in the PAP.	March 1, 2015	May 15, 2015	Established as Appendix B: COR Delegation Template 2015 in PAP
3	An IL is being written to provide the FAS BCMs the guidance on updating the proposed COR Spreadsheet. It will detail who needs to update the spreadsheet, what and how often the information needs to be inputted. QV will send a courtesy copy of the draft IL to the Office of Inspector General for review.	Instructional Letter QV has included the link in the PAP.	March 1, 2015	May 15, 2015	Instructions in draft PAP (attached for IG review).

Appendix A – Action Plan for Report Number A130007/Q/A/P14006 (cont.)

Audit Report Title: Opportunities Exist to Strengthen the Federal Acquisition Service’s Contracting Officer’s Representatives Workforce

**Audit Report Number A130007/Q/A/P14006
September 29, 2014**

Contact Person: [REDACTED]

Audit Report Number/Title	Recommendation Number	Completion Date(s)
A130007	4	November 29, 2015

Recommendation: Develop a method to quantify and monitor COR workload.

	<u>Action to be Taken Step by Step</u>	<u>Supporting Documentation</u>	<u>Due Date</u>	<u>IG Extended Date</u>	<u>Status</u>
1	The FAS Office of Acquisition Management (QV) will monitor the column in the spreadsheet that identifies the number of contracts assigned to a COR (see 4.2) to determine CORs workload assignments and a method to quantify and make appropriate adjustments.	COR workload assignments	March 1, 2015	May 15, 2015	First review is in June
2	A new column in the COR spreadsheet is asking for the BCMs to identify how many contracts a COR has assigned to them. With this new information, the FAS BCM, regional BCMs and the Agency Workforce Division can quantify and monitor COR workload. The FAS BCM will have to rely on the information given to us from the regional BCMs and from contracting officers.	COR Spreadsheet	March 1, 2015	May 15, 2015	See spreadsheet for information. Reviewed quarterly, w/updates.

Appendix A – Action Plan for Report Number A130007/Q/A/P14006 (cont.)

Audit Report Title: Opportunities Exist to Strengthen the Federal Acquisition Service’s Contracting Officer’s Representatives Workforce

**Audit Report Number A130007/Q/A/P14006
September 29, 2014**

Contact Person: [REDACTED]

Audit Report Number/Title	Recommendation Number	Completion Date(s)
A130007	5	November 29, 2015

Recommendation: Establish: (1) guidelines for evaluating training courses for credit towards CLP achievement requests, and (2) controls to ensure CORs complete FAS-required training courses.

	<u>Action to be Taken Step by Step</u>	<u>Supporting Documentation</u>	<u>Due Date</u>	<u>IG Extended Date</u>	<u>Status</u>
1	During FY15, the FAS Office of Acquisition Management will partner with the GSA Acquisition Workforce Division to establish recommended COR continuous learning requirements. The FAS Office of Acquisition Management will also partner with FAS regional BCMs/BCLMs to establish FAS-specific guidelines to strengthen the CORs in the Federal Acquisition Service. These recommended COR training courses will be identified in an instructional letter.	Instructional Letter (IL) QV has developed a draft Policy and Procedures (PAP) document instead of an IL.	February 1, 2015 (OGP confirmed today that they will not have the COR training courses reviewed until the fourth quarter.	October 15, 2015	Partnership has begun. GSA’s ACM has listed courses on the GSA Acquisition Portal under each certification level (different options to be completed). Additional courses being discussed among FAS BCMs/BCLMs that are beneficial to strengthen the FAS AW, and a method to provide the additional training to reach FAS CO as well as FAS regions.

Appendix A – Action Plan for Report Number A130007/Q/A/P14006 (cont.)

2	The FAS Office of Acquisition Management will review the FAITAS system on a quarterly basis to determine and validate COR training information. These reviews will ensure that the appropriate training is being taken and that there is no duplication.	FAITAS Reports	March 1, 2015	May 15, 2015	FAS/QV has begun validating the training for the levels and to ensure consistency throughout FAS.
3	An IL is being written which will provide guidance for evaluating training courses for credit towards CLP achievement requests and controls to ensure that CORS complete FAS training courses.	Instructional Letter QV has developed a draft Policy and Procedures (PAP) document instead of an IL.	March 1, 2014	May 15, 2015	FAS/QV is working with the GSA ACM to place FAS required training into FAITAS to prompt FAS applicants that IL 2014-04 requirements for FAS training in order to certify/recertify. Notification will also be provided in the QV Newsletter, with reminders periodically of the requirement.

Appendix A – Action Plan for Report Number A130007/Q/A/P14006 (cont.)

Audit Report Title: Opportunities Exist to Strengthen the Federal Acquisition Service’s Contracting Officer’s Representatives Workforce

**Audit Report Number A130007/Q/A/P14006
September 29, 2014**

Contact Person: [REDACTED]

Audit Report Number/Title	Recommendation Number	Completion Date(s)
A130007	6	November 29, 2015

Recommendation: Determine if restructuring the Central Office bureau would improve transparency and management of the FAS COR workforce.

	<u>Action to be Taken Step by Step</u>	<u>Supporting Documentation</u>	<u>Due Date</u>	<u>IG Extended Date</u>	<u>Status</u>
1	The FAS Office of Acquisition Management and the GSA Acquisition Workforce Division are currently reviewing the benefits of restructuring the Central Office FAITAS bureau to support the FAS COR workforce.	Written findings from the Management review	February 1, 2015	April 15, 2015	Submitted on 4/15/2015 to the IG’s office. FAS is working with FAS BCMs/BCLMs, portfolios, and regions to provide monthly reports to all parties (BCM/BCLMs, supervisors, training managers for validation and updates on the status of their employees who are certified, registered, CL beginning/end dates, etc.).

Appendix A – Action Plan for Report Number A130007/Q/A/P14006 (cont.)

REVISED ACTION PLAN

Audit Report Title: Opportunities Exist to Strengthen the Federal Acquisition Service’s Contracting Officer’s Representatives Workforce

**Audit Report Number A130007/Q/A/P14006
September 29, 2014**

Contact Person: [REDACTED]

Audit Report Number/Title	Recommendation Number	Completion Date(s)
A130007	4	July 15, 2015

Recommendation:

Develop a method to quantify and monitor COR workload.

	<u>Action to be Taken Step by Step</u>	<u>Supporting Documentation</u>	<u>Documentation will be sent by (date)</u>
1	The FAS Office of Acquisition Management (QV) will monitor the column in the spreadsheet that identifies the number of contracts assigned to a COR (see 4.2). The FAS Central Office and Regional BCMs will determine their respective CORs workload assignments and a method to quantify in each office and make appropriate adjustments.	QV will advise the IG by email of status and of any adjustments in workload assignments 15 days after the end of a quarter.	July 15, 2015

Appendix A – Action Plan for Report Number A130007/Q/A/P14006 (cont.)

Audit Report Title: Opportunities Exist to Strengthen the Federal Acquisition Service’s Contracting Officer’s Representatives Workforce

Audit Report Number A130007/Q/A/P14006
September 29, 2014

Contact Person: [REDACTED]

Audit Report Number/Title	Recommendation Number	Completion Date(s)
A130007	5	October 15, 2015

Recommendation:

Establish: (2) controls to ensure CORs complete FAS-required training courses.

	<u>Action to be Taken Step by Step</u>	<u>Supporting Documentation</u>	<u>Documentation will be sent by (date)</u>
2	The FAS Office of Acquisition Management will review the Central Office FAC-COR certification and Continuous Learning Achievement requests submitted in FAITAS to ensure FAS specific required training courses are completed. In addition, the FAS Office of Acquisition Management will remind and encourage all regional BCMs of the need to complete FAS-required training courses. These reviews will ensure that the appropriate training is being taken and that there is no duplication in either the FAS required or the FAC-COR training courses.	<ol style="list-style-type: none"> 1. Issued an email on May 5, 2015 with the subject line "Compliance with IL 2014-04 as identified in IG Report-A130007/Q/A/P14006" to the portfolios and all Regional BCMs for all FAC certifications regarding the FAS required training 2. In the PAP, the FAS BCMs for FAC-COR will receive instructions for compliance on this same item when applications for re-certification (Continuous Learning Achievements) are received. 3. In the next quarterly QV newsletter, QV will reiterate the need to all of FAS to complete the FAS required training for all the FAC certifications and Continuous Learning Achievements requests. 	<p>May 21, 2015- For documents 1 and 2;</p> <p>September 30, 2015 for the article in the QV newsletter</p>

Appendix B – Report Distribution

Commissioner, Federal Acquisition Service (Q)

Deputy Commissioner, Federal Acquisition Service (Q1)

Chief of Staff, Federal Acquisition Service (Q)

Assistant Commissioner, Office of Acquisition Management (QV)

GAO/IG Audit Management Division (H1G)

Assistant Inspector General for Auditing (JA)

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