



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

IMPLEMENTATION REVIEW OF ACTION PLAN

Audit of GSA's Acquisition of Vehicles  
Report Number A110105/Q/A/P12001  
December 14, 2011

*Assignment Number A150148  
November 9, 2015*



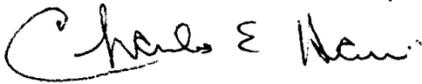
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**Office of Audits  
Office of Inspector General  
U.S. General Services Administration**

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DATE: November 9, 2015

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



FROM: Charles E. Harris  
Audit Manager, Greater Southwest Region Audit Office (JA-7)

SUBJECT: Implementation Review of Action Plan  
Audit of GSA's Acquisition of Vehicles  
A110105/Q/A/P12001  
December 14, 2011  
*Assignment Number A150148*

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 FAS has taken the corrective actions as outlined in the action plan for our Audit of GSA's Acquisition of Vehicles. To accomplish our objective we:

- Reviewed the original report and recommendations;
- Reviewed FAS's corrective action plan and supporting documentation showing that corrective actions were taken; and
- Performed limited testing to verify that corrective action plan items were implemented.

Our implementation review found that FAS addressed the audit recommendations in the action plan, dated February 2, 2012.

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

Charles Harris      Audit Manager      [Charles.Harris@gsaig.gov](mailto:Charles.Harris@gsaig.gov)      (817) 978-4850  
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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 December 14, 2011, we issued an audit report, Audit of GSA's Acquisition of Vehicles to the Commissioner of FAS. The objective of the audit was to evaluate procurement practices within FAS's Office of Travel, Motor Vehicle, and Card Services to determine if vehicle acquisitions were awarded and administered in accordance with applicable laws, regulations, policies, and procedures.

Our audit found:

- The required approval was not obtained for acquisition plans, which puts the acquisitions at risk.
- The lack of coordination with the Office of General Counsel on high dollar acquisition plans affects the integrity of the planning process and puts the award at risk.
- Pre-Negotiation Clearance Panels were not conducted when required, which compromises the quality of negotiations.
- Contracting officers did not maintain a complete record of all acquisition steps and actions executed in contract files leading to inadequate contract file documentation.

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

- Increase supervisory oversight during acquisition planning to ensure all acquisition plans are approved by the appropriate officials prior to issuing the solicitation.
- Implement a procedure to ensure all applicable acquisition plans are coordinated with the Office of General Counsel prior to approval of the acquisition plan.
- Strengthen management controls over the pre-negotiation process to ensure Pre-Negotiation Clearance Panels are properly conducted and documented when required.
- Improve and standardize the contract file documentation process to ensure:
  - Contract file documents are complete and accurate.
  - All completed actions and steps have supporting documentation.
  - Each file is organized according to a completed index or checklist.
  - The transfer of files between contracting officers is clearly documented and an inventory of contract file documents is recorded.

The Commissioner of FAS agreed with the report recommendations.

## Results

Our implementation review found that FAS has taken appropriate corrective actions to address the recommendations. We determined that no further action is necessary.

# Appendix A – Action Plan for Report Number A110105/Q/A/P12001

## ACTION PLAN

Contact Person: [REDACTED]  
 Telephone: [REDACTED]  
 Date: February 2, 2012

Audit Report Number/Title	Recommendation Number	Completion Date
A110105/Q/A/P12001	1	May 15, 2012

### Recommendation

Increase supervisory oversight during acquisition planning to ensure all acquisition plans are approved by the appropriate official prior to issuing the solicitation.

Step	Action to be Taken Step by Step	Supporting Documentation to be Sent to BEI	Documentation will be sent by (date)
1	Management will take the appropriate steps to train, instruct and require all contracting personnel to utilize the Acquisition Planning Wizard (APW) and, when a Microsoft Word acquisition plan is utilized, to ensure the plan is forwarded to the appropriate offices as required.	<ol style="list-style-type: none"> <li>Copy of internal QMA guidance newsletter, Acquisition @ a Glance, Issue 1, Acquisition Plans and transmittal notice to workforce. In addition, document has been posted in QMA's Google docs and will be posted in QMA's Chatter group site.</li> <li>Copy of related training materials and attendance record(s).</li> </ol>	<ol style="list-style-type: none"> <li>March 15, 2012</li> <li>May 15, 2012</li> </ol>
2	Management requires the review of all acquisition plans prior to the submission to the appropriate level of approval to ensure that all requisite FAR and GSAM are complete. This review is conducted by the first line supervisor, the contracting officer and contract specialist to the procurement, and at least one additional contracting professional to ensure accuracy.	<ol style="list-style-type: none"> <li>Copy of internal QMA guidance newsletter, Acquisition @ a Glance, Issue 1, Acquisition Plans and transmittal notice to workforce. In addition, document has been posted in QMA's Google docs and will be posted in QMA's Chatter group site.</li> <li>Milestone tracking document.</li> </ol>	Items 1 & 2: March 15, 2012
3	Divisional management will require the contracting staff to review the (APW) on-line tutorial as well as internal GSA subject matter experts, as well as external training sources, to draw upon for course material, including FAR and GSAM sources, pertaining to the roles, responsibilities and rationale for the appropriate utilization of acquisition planning techniques. This training will be on an ongoing basis as these Divisions routinely sponsor rotational interns and newly appointed full time federal employees.	Copy of related training materials and attendance record(s).	May 15, 2012

## Appendix A – Action Plan for Report Number A110105/Q/A/P12001 (cont.)

### ACTION PLAN

Contact Person: [REDACTED]  
 Telephone: [REDACTED]  
 Date: February 2, 2012

Audit Report Number/Title	Recommendation Number	Completion Date
A110105/Q/A/P12001	2	May 15, 2012

#### Recommendation

Implement a procedure to ensure all applicable acquisition plans are coordinated with the Office of General Counsel prior to approval of the acquisition plan.

Step	Action to be Taken Step by Step	Supporting Documentation to be Sent to BEI.	Documentation will be sent by (date)
1	Divisional management will instruct all contracting personnel to seek and ensure written documentation of communications with OGC when appropriate, especially in high dollar value, international, as well as complex acquisitions.	<ol style="list-style-type: none"> <li>1. Copy of internal QMA guidance newsletter, Acquisition @ a Glance, Issue 1, Acquisition Plans and transmittal notice to workforce. In addition, document has been posted in QMA's Google docs and will be posted in QMA's Chatter group site.</li> <li>2. Copy of related training materials and attendance record(s).</li> </ol>	<ol style="list-style-type: none"> <li>1. March 15, 2012</li> <li>2. May 15, 2012</li> </ol>
2	Management will utilize internal GSA and OGC subject matter experts, as well as external training sources, to draw upon for course material, including FAR and GSAM sources, pertaining to the roles, responsibilities and rationale for the appropriate level of OGC participation in the acquisition. This training will be on an ongoing basis as these Divisions routinely sponsor rotational interns and newly appointed full time federal employees.	<ol style="list-style-type: none"> <li>1. Copy of internal QMA guidance newsletter, Acquisition @ a Glance, Issue 1, Acquisition Plans and transmittal notice to workforce. In addition, document has been posted in QMA's Google docs and will be posted in QMA's Chatter group site.</li> <li>2. Copy of related training materials and attendance record(s).</li> </ol>	<ol style="list-style-type: none"> <li>1. March 15, 2012</li> <li>2. May 15, 2012</li> </ol>

## Appendix A – Action Plan for Report Number A110105/Q/A/P12001 (cont.)

### ACTION PLAN

Contact Person: [REDACTED]  
 Telephone: [REDACTED]  
 Date: February 2, 2012

Audit Report Number/Title	Recommendation Number	Completion Date
A110105/Q/A/P12001	3	March 15, 2012

#### Recommendation

**Strengthen management controls over the pre-negotiation process to ensure Pre-Negotiation Clearance Panels are properly conducted and documented when required.**

Step	Action to be Taken Step by Step	Supporting Documentation to be Sent to BEI.	Documentation will be sent by (date)
1	Management will instruct all contracting staff to review the appropriate FAR and GSAM requirements as to when to conduct a PNCP, and to require the appropriate level of written documentation for the contract file. (Electronic or paper file).	<ol style="list-style-type: none"> <li>1. TMVCS Operational Notice AO-12-001, Clearance Panel Procedures.</li> <li>2. QMA PNCP Report Template Instructions.</li> <li>3. FAS Instructional Letter (IL) 2011-15, Revision of the Acquisition Quality Measurement and Improvement Program.</li> </ol>	All items: March 15, 2012.

## Appendix A – Action Plan for Report Number A110105/Q/A/P12001 (cont.)

### ACTION PLAN

Contact Person: [REDACTED]  
 Telephone: [REDACTED]  
 Date: February 2, 2012

Audit Report Number/Title	Recommendation Number	Completion Date
A110105/Q/A/P12001	4	January 15, 2013

#### Recommendation

Improve and standardize the contract file documentation process to ensure (1) contract file documents are complete and accurate, (2) all completed actions and steps have supporting documentation, (3) each file is organized according to a completed index or checklist, and (4) the transfer of files between contracting officers is clearly documented and an inventory of contract file documents is recorded.

Step	Action to be Taken Step by Step	Supporting Documentation to be Sent to BEI.	Documentation will be sent by (date)
1	Management requires that all contracting personnel follow the Tab Advisory Guide as required by the FAR and GSAM.	<ol style="list-style-type: none"> <li>1. QMA will transition to the Electronic Contracting File (eCF) system.</li> <li>2. Training will be conducted through eCAT training with related training materials and attendance record(s).</li> </ol>	<ol style="list-style-type: none"> <li>1. January 15, 2013</li> <li>2. May 15, 2012</li> </ol>
2	Contracting personnel have been trained and instructed to follow the Tab Advisory Guide.	Training will be conducted through eCAT training with related training materials and attendance record(s).	May 15, 2012
3	Contracting personnel are required to timely input all transactions into the FSS-Online and other electronic contract system to ensure timely recordation of transactions.	Training will be conducted through eCAT training with related training materials and attendance record(s).	May 15, 2012
4	Management will instruct all contracting personnel to update a contract file in the event there is a change in the contracting personnel (POC) during the period of performance of the contract, and to utilize established contract action logs sheets that document which contracting personnel were involved in all activity to the file. GSA is migrating from an "all paper" to full electronic contract system which will ensure a complete record of the acquisition.	<ol style="list-style-type: none"> <li>1. QMA will transition to the Electronic Contracting File (eCF) system.</li> <li>2. Training will be conducted through eCAT training with related training materials and attendance record(s).</li> <li>3. Copy of internal QMA guidance newsletter, Acquisition @ a Glance, Issue 2, Contract Files and transmittal notice to workforce. In addition, document has been posted in QMA's Google docs and will be posted in QMA's Chatter group site.</li> </ol>	<ol style="list-style-type: none"> <li>1. January 15, 2013</li> <li>2. May 15, 2012</li> <li>3. March 15, 2012</li> </ol>

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## ***Appendix B – Report Distribution***

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Commissioner, Federal Acquisition Service (Q)

Deputy Commissioner, Federal Acquisition Service (Q1)

Chief of Staff, Federal Acquisition Service (QOA)

Assistant Commissioner, Office of Travel, Motor Vehicle, and Card Services (QM)

Director, Office of Acquisition Operations (QMA)

Director, Internal Control Division (BCB)

Branch Chief, GAO/IG Audit Response Branch (BCBB)

Director, Business Analytics and Consulting Division (QBOA)

Assistant Inspector General for Auditing (JA)

Deputy Assistant Inspector General for Investigations (JID)

Director, Audit Planning, Policy, and Operations Staff (JAO)