



June 26, 2018

TO: Gina Cross
Acting Director, AmeriCorps NCCC

Robert McCarty
Chief Financial Officer

FROM: Stuart Axenfeld /s/
Assistant Inspector General for Audit

SUBJECT: Final Management Alert: Serious Weaknesses in National Civilian Community Corps Recruiting Contract May Jeopardize Program Success

Attached is the Office of Inspector General Final Management Alert, entitled Serious Weaknesses in National Civilian Community Corps Recruiting Contract May Jeopardize Program Success.

Under the Corporation's audit resolution policy, a final management decision on the findings and recommendations in this report is due by December 26, 2018. Notice of final action is due by June 26, 2019.

If you have questions about this letter, please contact Carol Bates, Audit Manager, at (202) 579-7900 or c.bates@cncsoig.gov.

cc: Barbara Stewart, Chief Executive Officer
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MANAGEMENT ALERT: Serious Weaknesses in National Civilian Community Corps Recruiting Contract May Jeopardize Program Success

Executive Summary

Successful, cost-effective operation of the AmeriCorps National Civilian Community Corps (NCCC) requires full enrollment and strong retention of members: 1,200 for Traditional NCCC and 1,000 for Federal Emergency Management Agency (FEMA) Corps. In addition to standard eligibility criteria, NCCC is required by law to recruit 50 percent of its members from disadvantaged backgrounds. Because NCCC has been unable to meet these crucial goals, it eliminated its internal recruitment operation and outsourced recruiting, awarding a \$2.6 million five-year fixed-price contract to Drannek Consulting (Drannek).

Why We Did This Review

We conducted our review to determine whether the \$2.6 million NCCC recruitment contract is structured to meet the crucial goal of annually filling the 1,200 Traditional NCCC and 1,000 FEMA Corps vacancies with members likely to successfully complete their terms of service.

What We Found

1. The NCCC recruitment contract places up to \$2.6 million at risk because the contract rewards level of effort and outputs and does not compensate the contractors based upon enrollment and retention of successful members.
2. Although the contract requires Drannek to create and maintain a database of prospective applicants that complies with the Corporation for National and Community Service (CNCS) cybersecurity and privacy policies and procedures, there is no assurance that the database in fact meets Federal and CNCS standards. NCCC did not provide the cybersecurity and privacy requirements the vendor must meet to safeguard applicants' Personally Identifiable Information (PII). NCCC did not engage CNCS's Chief Information Security Officer (CISO) in the procurement, and the database and the transmission of its contents are not subject to review, acceptance and oversight by the CISO.
3. Drannek failed to demonstrate that it possesses the experience and proof of success specified in the solicitation and necessary for satisfactory performance.
4. The CNCS Contracting Officer's Representative (COR) lacks the requisite recruiting experience and is not exercising sufficient oversight to ensure the contractor's compliance with the contract requirements.

Recommendations

Based upon our findings, we recommend that NCCC take the following actions:

1. Decline to exercise the recruitment contract options;
2. Promptly undertake a new procurement, with clear objectives, statement of work, experience and professional attributes and deliverables which is structured as a performance-based contract, with metrics tied to recruitment of applicants who meet the program criteria, meet the diversity requirements and successfully complete their terms;
3. Assign a COR who has strong recruitment knowledge and experience to effectively manage and oversee this contract;
4. Ensure that the selected contractor demonstrates the requisite past performance, meets all the technically acceptable evaluation criteria and has qualified personnel who all meet the Statement of Work (SOW) requirements; and
5. Provide bidders with the CNCS detailed cybersecurity requirements, policies and procedures, and have the CNCS CISO review the bidder's cybersecurity safeguards to ensure that it has the systems in place to maintain secure databases that meet applicable cybersecurity mandates and protect PII.

CNCS Response

In response to our draft management alert, CNCS and NCCC advised that they would not extend the current recruiting contract and would undertake a new procurement, perhaps including a performance-based element. We continue to believe that such a contract should include among the metrics selection, enrollment, completion of service and progress in meeting diversity goals. A recruiting contract that fails to improve NCCC's performance in these metrics would add little value. The contract should be structured to align the contractor's success with NCCC's success, which is an important advantage of a performance-based award.

We agree that NCCC will benefit from greater procurement support, to help ensure that the Statement of Work is complete and correctly drafted and the bids properly evaluated. Further, we are pleased that CNCS's in-house information security professionals will play a significant role in ensuring that any database created or maintained by the contractor will meet Federal requirements.

The positive response to many of our recommendations should eliminate many of the significant risks identified by CNCS-OIG and strengthen NCCC's operations. This decision will help to ensure that Federal funds are used to their maximum benefit. The full response submitted by NCCC is attached.

Background

For years, NCCC has struggled to recruit and retain members in both the traditional NCCC program and the newer FEMA Corps.¹ NCCC acknowledges that full enrollment is critical to its success, but under-enrollment and high attrition have impeded efficient operations.² The requirement that NCCC recruit 50 percent of its members from disadvantaged backgrounds, 42 U.S.C. § 12613(c) *Diverse backgrounds of participants*, has increased the enrollment and retention challenges. Because NCCC recruitment personnel were unable to meet these crucial goals, NCCC decided to outsource the recruiting function and eliminate the internal positions.

In July 2017, CNCS's Office of Procurement Services (OPS) awarded a fixed-price contract (Recruitment Contract) to Drannek. Its stated goal is to recruit sufficient members to fill the 1,200 traditional NCCC and 1,000 FEMA Corps vacancies. The contract is for an initial period of one year at \$475,000, followed by four one-year options at escalating prices. Because the Recruitment Contract rewards effort and outputs, rather than outcomes, and because the selected contractor did not meet key requirements in the SOW and/or Technical Acceptability Evaluation Criteria, continued reliance on this contract may jeopardize successful operation of NCCC and waste millions of dollars without meeting enrollment and retention goals.

Findings

- 1. The Recruitment Contract does not measure or reward critical outcomes, such as the recruitment, selection and enrollment of superior applicants or the successful completion of their service terms.**

The purpose of the NCCC Recruitment Contract is to recruit acceptable members to fill the 2,200 NCCC member slots per year.³ The SOW⁴ specifies the tasks that the contractor is to complete, such as working with NCCC to develop recruiting plans, presentations and marketing materials, interviewing and evaluating applicants, conducting outreach to schools and other organizations where potential applicants may be found, creating a database of potential applicants and providing regular progress reports to NCCC.⁵ Contract staff are to travel 42

¹ AmeriCorps Traditional NCCC partners with local and federal organizations to complete hands-on service projects throughout the United States. Projects address natural and other disasters, infrastructure improvement, environmental stewardship and conservation, energy conservation, and urban and rural development. In an effort to strengthen the federal government's disaster preparedness and response, AmeriCorps NCCC and the Federal Emergency Management Agency (FEMA) partnered to create FEMA Corps.

² CNCS OIG Report No. 17-05, *Evaluation of the National Civilian Community Corps (NCCC) Program*, available at <https://www.cncsoig.gov/news-entry/17-05>. Although this report focused on traditional NCCC, FEMA Corps has also faced enrollment challenges.

³ Statement of Work, Member Recruitment System (SOW), Section 3.0, *Scope of Work*, at 3.

⁴ The Statement of Work was included in the solicitation documents and is incorporated into the resulting contract.

⁵ See generally SOW, Section 2.0, *Objective*, and Section 3.0, *Scope of Work*, at 1-4.

weeks per year to places identified in the annual recruitment plan and to conduct at least 16 program presentations per week.⁶

The SOW requires the contractor to work with NCCC to develop an annual plan that includes performance goals for each type of recruitment activity. However, payment under this contract is not based on success in attaining full enrollment and high retention of members. Rather than including outcomes to evaluate the contractor's success, payments are based on hours worked by the contractor. The contract includes no outcome-based incentive payments to align the contractor's interests with those of NCCC. The contractor's compensation is not tied to whether:

- Drannek recruits highly qualified applicants;
- NCCC actually selects Drannek's recruits;
- The selectees enroll in NCCC;
- Enrollment of disadvantaged members increases;
- Drannek-recruited members pose disciplinary problems; or
- Members recruited by Drannek successfully complete their ten months of service.

As long as it registers enough acceptable applicants⁷ to fill the class, Drannek can be indifferent to the quality of those applicants and their ultimate success in NCCC. The contract provides Drannek no financial incentive to invest the effort necessary to produce program success. Given the challenges that NCCC has experienced with disciplinary problems and high attrition, a recruitment contract should be structured to address and minimize those problems. Indeed, the contract does not specify the attributes of an acceptable member, to inform Drannek's recruiting efforts.

The Office of Management and Budget has long encouraged agencies that contract for professional services to use performance-based (sometimes called "outcome-based") contracting, a results-oriented procurement approach that focuses on outputs, quality or outcomes and ties at least a portion of a contractor's payment, contract extensions or renewals to meeting specific, measurable performance standards and requirements. Successful use of performance-based contracts involves:

- Describing the requirements in terms of results rather than methods of performance;
- Including in the contract carefully determined measurable performance standards addressing quality, quantity and timeliness;

⁶ *Id.*, Section 2.0.

⁷ *Id.*, Section 2.0, at 3. Although the SOW refers to "acceptable applicants," *id.*, it does not define the term; it is not clear whether this is intended to signify some quality in addition to the eligibility criteria. The SOW does not identify the eligibility criteria for Traditional NCCC or the more restrictive admission criteria for FEMA Corps. NCCC eligibility requirements are at 42 U.S.C. § 12613(b), (c) and the Joint NCCC-FEMA Corps Implementation Plan, Annex A, IV B 7 requires that FEMA Corps members be U.S. Citizens.

- Establishing as part of the contract a quality assurance plan for measuring the contractor's performance; and
- Specifying appropriate positive and/or negative incentives.⁸

Federal Acquisition Regulation (FAR) Subpart 37.6 contains the rules for performance-based service contracts. Other Federal agencies have amassed toolkits for these contracts.⁹ CNCS's own acquisition policy directs the staff to consider performance-based contracts for service contracts totaling \$1 million or more.¹⁰ It directs that "Contracting Officers should incorporate PBA [performance-based acquisition] methods when appropriate to encourage contractor innovation and efficiency, and to help ensure that contractors provide timely, cost-effective, and quality performance with measurable outcomes."¹¹

Instead of performance-based contracting, NCCC's Recruitment Contract specifies the effort to be expended rather than the outcomes to be achieved. The SOW prescribes actions that will, NCCC hopes, reach the desired results—number of trips, number of presentations and relationships developed, outreach materials and efforts—rather than recruitment of a specified number of successful members.

Whether performance-based or otherwise, sound management principles require that CNCS have a plan for evaluating contract performance. The CNCS Acquisition Policy specifically requires that service-based contracts include a quality assurance plan to monitor contractor performance.¹² Neither the COR nor NCCC's Director of Operations could explain how NCCC will determine or measure the success of this contract, beyond citing the required number of site visits and the number of potential recruits identified. Although the contract is more than halfway through its first year, NCCC has yet to decide how and when to evaluate it. Moreover, neither the COR nor the Director of Operations could describe a fallback plan in the event that Drannek's recruiting is inadequate.¹³

Ensuring that NCCC gets full value for its money will also be difficult because certain of the tasks required by the contract are not included among the deliverables. For example:

- *Employment and career opportunities:* Multiple items among the contract's Objectives relate to identifying employment opportunities for program alumni. These include:

⁸ See GAO-02-1049 (2002), *Guidance Needed for Using Performance-Based Service Contracting*.

⁹ See, e.g., <https://www.energy.gov/management/office-management/operational-management/procurement-and-acquisition/guidance-procurement-2>.

¹⁰ CNCS Policy 350, *Acquisition*, Section 4.1.

¹¹ *Id.*

¹² CNCS Policy 350, 4.404, *Control*, (2).

¹³ NCCC stated that it has other recruitment avenues, such as word of mouth, but could not quantify, even approximately, the percentage of applicants it will enroll from those sources. The Recruitment Contract itself contemplates that Drannek will supply all of NCCC's enrollment.

- Meeting with service organizations about career opportunities for program graduates;
- Building relationships with potential employers;
- Identifying the skillsets and experiences that would make alumni attractive to employers; and
- Identifying program candidates with the skills sought by employers who could enhance their attractiveness by means of NCCC participation.¹⁴

The only deliverable associated with these tasks is a monthly report that includes potential job opportunities.¹⁵ There is no requirement to quantify the referrals of alumni, the interviews granted or the number of program graduates hired as a result.

- *Interests of potential members:* The Objectives section of the contract tasks Drannek to examine how NCCC meets the career goals, skills improvement and personal interests of target members.¹⁶ However, the contract contains no further specifications or requirements for this examination, and no report on the results appears as a deliverable.¹⁷
- *Success algorithm:* The contract tasks Drannek with “develop[ing] an algorithm of the characteristics of successful members,” to be used to identify candidates from online sources.¹⁸ Surely it is for the longtime leadership of NCCC, and not the new contractor, to define what constitutes a successful member. No such definition of success appears in the contract, and Drannek cannot develop its algorithm without it. The algorithm itself is not shown as a deliverable.

The absence of deliverables associated with these required tasks will make it difficult for NCCC to know whether Drannek is fulfilling the contract requirements and to hold the contractor accountable if it fails to do so.

In sum, the structure of the NCCC recruitment contract leaves CNCS vulnerable to paying out \$2.6 million dollars to a contractor for effort, even if the contractor fails to achieve the crucial recruitment purpose and goals of the program.

2. NCCC did not require the contractor to demonstrate that the database that stores recruits’ Personally Identifiable Information complies with applicable cybersecurity and privacy requirements.

The Recruitment Contract requires Drannek to develop and maintain a database of potential NCCC applicants that includes such PII as their contact information (names, addresses, phone

¹⁴ SOW, Section 2.0, at 2.

¹⁵ SOW, Section 5.0 (*Deliverables*), at 6.

¹⁶ SOW, Section 2.0, at 2.

¹⁷ SOW, Section 5.0, at 6.

¹⁸ SOW, Section 3.0, at 4.

numbers and email addresses), as well as their demographic and educational information. The SOW requires that this data be maintained in compliance with various government-wide standards and CNCS cybersecurity and privacy policies and procedures, but describes them inconsistently:

- The Objective section mandates that the contractor will “[e]stablish[] and maintain[] a contractor-provided electronic portfolio that complies with CNCS cybersecurity and privacy policies.”¹⁹
- The Scope of Work provisions reiterate the point, albeit somewhat differently: “The contractor will provide and maintain a secure recruitment tracking and data management database that meets the CNCS FISMA standards.”²⁰
- The deliverables include “an electronic portfolio for AmeriCorps NCCC that complies with CNCS cybersecurity and privacy policies.”²¹

Despite CNCS’s obligation to oversee its contractors’ information security and privacy practices, neither the SOW nor the Request for Proposal included the “CNCS FISMA standards,” applicable Federal requirements or the specific cybersecurity policies and procedures that NCCC expected the contractor to follow. The authorities governing information security are multi-sourced and multilayered,²² and they change frequently. A contractor with limited exposure to them cannot be expected to identify or understand them without meaningful guidance. Drannek’s proposal included only general information on its information technology security (physical security, access security and virus protection), but did not explain how it intended to manage a database full of PII in a manner that would comply with the intricacies of Federal standards and CNCS policies.

Neither the CISO nor anyone else with a background or expertise in cybersecurity and privacy helped to develop the procurement requirements in this area or assisted in reviewing the proposals. Thus, the determination that Drannek’s proposal met the Technical Acceptability Evaluation Criteria related to cybersecurity and privacy was made by individuals who lacked expertise in those highly technical areas.

After we questioned Drannek’s capability to protect PII, the COR wrote to Drannek, seeking information about its safeguards. Again, Drannek responded with general descriptions of its network and physical security, without addressing the Federal standards or the CNCS requirements for PII applicable to the NCCC database. As result, to date, Drannek has not

¹⁹ SOW, Section 2.0, at 2.

²⁰ SOW, Section 3.0, at 4.

²¹ SOW, Section 5.0, at 6.

²² Federal Information Security Modernization Act of 2014 (Public Law 113-283; December 18, 2014). The original FISMA was the Federal Information Security Management Act of 2002 (Public Law 107-347 (Title III); December 17, 2002), in the E-Government Act of 2002. The National Institute of Standards and Technology is charged with developing and maintaining standards, guidelines, recommendations and research on the security and privacy of information and information systems.

provided evidence that it has the resources, capacity and management support infrastructure in place to protect PII contained in the database consistent with Federal standards and CNCS's requirements.

CNCS's Office of Inspector General (OIG) annual evaluations of information security at CNCS have repeatedly found deficiencies in the Corporation's oversight of its contractor-managed systems and databases.²³ To meet Federal information security requirements, as well as its own policies, the Office of Information Technology and the CISO should be involved from the inception whenever CNCS or one of its programs proposes to engage a contractor to develop and maintain information technology systems and databases, particularly those containing PII. This includes not only the initial development but also ongoing monitoring of information security and privacy.

Without oversight by the CISO, neither CNCS nor the thousands of potential applicants from whom Drannek is collecting PII have assurance that their information is secure. The seriousness of incursions into such information, in the public and in the private sector, can hardly be overstated. Should a breach occur, the costs of remedial action may be prohibitive. Until the CISO or another competent expert can review the security and privacy protections for the Drannek database, NCCC applicants and CNCS remain unnecessarily at risk.

3. NCCC's irregular proposal evaluation resulted in selection of an unqualified contractor; CNCS awarded the contract without any information about Drannek's past performance.

The solicitation for the Recruitment Contract set forth criteria for the evaluation of proposals. These criteria fell into three categories (referred to in the evaluation documents as "factors"): (1) the experience and skill of staff members performing similar tasks for other service programs, including an explanation of the contractor's technical approach and how those staff would fulfill the tasks in the SOW; (2) a promise that key staff would remain available for at least six months; and (3) the quality and extent of the bidder's past performance of similar tasks. To be deemed technically acceptable, a proposal would have to satisfy each of the stated criteria.²⁴

Only two companies responded to the solicitation for the Recruitment Contract, Drannek and a second bidder. The Contracting Officer's Representative (COR), an NCCC employee, determined

²³ See, e.g., [Report 18-03](#), p. 17 (need for consistent enterprise-wide information security, including for external systems); [Report 17-03](#), Exhibit 5 (controls over contractor systems ineffective in FYs 2015, 2016).

²⁴ The Technical Evaluation Memorandum states:

To be determined technically acceptable, all factors must be acceptable to obtain a passing rating for the technical quote. Any technical quote that does not receive acceptable assessment for all factors will receive a failing rating for the technical quote. Award will be made to the lowest-priced, technically acceptable, responsible quoter, with satisfactory past performance.

June 22, 2017 COR Technical Evaluation Memoranda addressed to the Contract Specialist.

that the second bidder met the technical criteria, but its bid exceeded NCCC's budget for the contract. Drannek, the COR determined, met none of the criteria; it submitted only a single resume and a Talent Recruiter & Diversity Specialist job description, which was insufficient. Drannek's submission did not describe its technical approach or how its personnel would perform the required tasks, and it contained no promise regarding the availability of staff and no past performance information. The COR therefore determined that Drannek's proposal was unacceptable.

At NCCC's request, however, OPS agreed to open "clarification" discussions with Drannek, relaying questions on May 25, 2017. Essentially, this gave Drannek a second opportunity to describe how it would perform the SOW requirements and its proposed staffing.²⁵ By June 5, the Contracting Officer expressed concerns about the extent of the discussions and suggested rebidding the contract.²⁶ Despite that inquiry, Drannek, the previously unacceptable bidder, was allowed to submit a revised proposal.

The COR rated the revised proposal as acceptable, although on its face it failed to satisfy the technical evaluation criteria in important respects:

- *No description of Drannek's technical approach:* The criteria required "a description of the vendor's technical approach to meet the objectives outlined in the SOW,"²⁷ and to break out "how staff members will perform the individual tasks." The revised proposal, however, did little more than restate the information in CNCS's SOW.
- *Proposed staff lacked relevant experience:* The criteria specify nine kinds of experience or capabilities required of the key personnel assigned to the project. These included "at least three years of experience in identifying, interviewing and evaluating applicants for a service program," as well as other specific skills and qualifications.²⁸ Drannek's revised proposal attached five resumes and a job description. None of the five resumes met all nine requirements, and some met none of them. ***None of the resumes reflected experience recruiting for a service program, as required in the solicitation.***²⁹ Instead, they included recruiting airline and defense professionals, senior business leadership, engineers and other highly educated/skilled technical staff. The proposal did not identify which of these

²⁵ Email dated May 25, 2017, from OPS to Drannek, transmitting/repeating the SOW requirements and requesting Drannek's response. OPS also entered into discussions with the other bidder to refine its pricing, but those discussions were unsuccessful.

²⁶ See email dated June 5, 2017, from Contracting Officer, OPS, to COR, NCCC, asking, "What are we asking the vendors to do? Why is there so much back-and-forth? Is this a requirement that needs to be cancelled and re-solicited?"

²⁷ Technical Acceptability Evaluation Criteria, Factor 1, Items A.a-b, attached as Exhibit A (hereafter TAEC).

²⁸ TAEC, Item B.a-h, plus unnumbered item on next page.

²⁹ See attachment B, comparison of resumes submitted by Drannek with personnel qualifications established by NCCC for Recruitment Contract.

were “key personnel.”

- *No assurance of staff availability:* The solicitation required each bidder to submit a “statement of understanding” that the key employees would remain available for at least six months.³⁰ Drannek’s proposal did not include any such assurance. When CNCS OIG requested the assurance statement, the COR, who signed the rating of the evaluation criteria, responded that he “assumed” the Contract Specialist had this information.³¹
 - *Contract awarded without any references or quality assessment of Drannek’s prior work.* The solicitation stated that bidders would be rated on their past performance of similar projects, based on (a) information in the government’s Past Performance Information Retrieval System database or (b) references from past or current clients. Drannek submitted no past performance information, and the COR accordingly found insufficient evidence to assure that Drannek’s past performance was of high or acceptable quality.³² When supplementing its proposal, Drannek submitted no additional past performance information. Yet the COR inexplicably found Drannek’s supplemental proposal to reflect acceptable past performance.
- 4. Experienced NCCC recruiting staff did not participate in the contract award or the ongoing contract oversight.**

Two key NCCC employees, the Director of Outreach and the Assistant Director for Recruitment and Partnerships, who had extensive member recruitment experience, had limited roles in developing the SOW for the contract. Instead, the SOW was formulated by a former CNCS budget employee, now an NCCC contractor, without recruiting experience. CNCS-OIG confirmed with former NCCC recruiting staff that they were aware of the solicitation, but they neither reviewed the final SOW before its publication, nor did they review the incoming proposals. Instead, the NCCC contractor and an NCCC program manager with no recruiting experience evaluated the proposals. Assigning staff without recruitment experience to evaluate the technical and past performance aspects of bidders’ capabilities may have contributed to the defects that we have identified.

³⁰ TAEC, Factor 2 (“Vendor must provide a statement of understanding and agreement that employee(s) selected to support the work requirements of the SOW will be expected to be dedicated to the requirement for a period of no less than six months. At such time when a replacement employee is necessary, the personnel change will be approved by the COR prior to commencement of work.”)

³¹ In fact, Drannek substituted personnel within weeks of winning the award.

³² The criteria mandate a rating of “neutral,” rather than “pass,” if no recent or relevant information past performance information is available “or that the offeror’s performance record is so sparse that no meaningful confidence assessment rating can be reasonably assigned.” TAEC, Factor 3, Past Performance (definitions of “pass,” “fail” and “neutral”).

The COR likewise has no experience with recruitment and was assigned to oversee this contract only because no other NCCC employee was certified to act in this capacity.³³ Moreover, the COR has since been detailed to another CNCS department, which further erodes oversight.

5. Drannek was allowed to change its staffing without COR approval.

The Recruitment Contract required that Drannek maintain its original staffing for six months, with any changes subject to advance approval by the COR.³⁴ One month after receiving the award, Drannek unilaterally changed two of the employees devoted to this project, without seeking approval from NCCC. On August 9, 2017, Drannek identified for the COR four employees who would need laptops to work on the contract. Two of these individuals had not been included in Drannek's proposal.

The COR never approved the substitution or the qualifications/resumes of the two replacements. Our review of their resumes indicates that neither meets the Technical Acceptability Evaluation Criteria for experience. Yet these individuals, who lack the experience prescribed by the SOW, continue to work on the contract, and CNCS is paying for their services.

Recommendations

To address the weaknesses identified, CNCS-OIG makes the recommendations set forth at the conclusion of the Executive Summary.

³³ The combination of an inexperienced contractor, a poorly structured contract and a COR without experience in the underlying purpose of the contract heighten the risks associated with this undertaking.

³⁴ TAEC, Factor 2

Attachment A: Technical Acceptability Evaluation Criteria

Factor 1. Experience

- A. Evidence that the vendor has the resources, capacity and management support infrastructure to ensure the delivery of the service outlined in the statement of work.
 - a. A description of the vendor's technical approach to meet the objectives and tasks outlined in the SOW.
 - b. Provide a break-out of how staff members will perform the individual tasks listed in the SOW.
- B. The resumes of the vendor's key personnel who will support the statement of work.
 - a. Resumes must document at least three years of experience in identifying interviewing and evaluating applicants for a service program.
 - b. Resumes must document performing follow-up activities after initial meetings with potential applicants including providing additional information or providing support during the application process.
 - c. Resumes must document experience in creating, entering and maintaining electronic applicant portfolios containing contact demographic and personal interest information.
 - d. Resumes must document experience in developing and presenting presentations to different types of audiences, collecting contact information from attendees, and providing follow-up information.
 - e. Resumes must document experience in building relationships with different organizations, agencies, programs and their alumni and stakeholders to generate applicants.
 - f. Resumes must document developing and presenting program status reports accompanied by statistical analysis, charts and graphs.
 - g. Resumes must document the vendor's experience in developing a marketing program to a targeted audience.
 - h. Resumes must document the vendor's experience in identifying potential applicants via social media, electronic job boards, search engines and

traditional media and determining the best way to interest them in participating in a program. Resumes must document the vendor's experience in developing marketing materials and distributing them in hard copy, electronically or posted on social [sic].

Factor 2. Statement of understanding

Vendor must provide a statement of understanding and agreement that employee(s) selected to support the work requirements of the SOW will be expected to be dedicated to the requirement for a period of no less than six months. At such time when a replacement employee is necessary, the personnel change will be approved by the COR prior to commencement of work.

Factor 3. Past performance

Past performance: Quoters' past performance information will be evaluated based on information obtained from the Government database called Past Performance Information Retrieval System (PPIRS). Vendors can provide references from past or current clients.

PASS (P): Based on the offeror's recent/relevant performance record, the Government has a high expectation that the offeror will successfully perform the required effort.

FAIL (F): Based on the offeror's recent/relevant performance record, the Government has no expectation that the offeror will be able to successfully perform the required effort.

NEUTRAL (N): No recent/relevant performance record is available or the offeror's performance record is so sparse that no meaningful confidence assessment rating can be reasonably assigned.

Factor 4. Price

The contractors' price quotations will be evaluated by CLIN level and award will go to the contractor whose technically acceptable quote has the lowest price.

Attachment B: Review of Proposal Resumes to TAEC Requirements

Requirements from Technical Acceptability Evaluation Criteria	Resume 1	Resume 2	Resume 3	Resume 4	Resume 5
Resumes must document at least three years of experience in identifying interviewing and evaluating applicants for a service program.	Yes for a summer youth program.	Yes but not for a service program.	Yes but not for a service program.	Yes but not for a service program.	No
Resumes must document performing follow-up activities after initial meetings with potential applicants including providing additional information or providing support during the application process.	No	Yes	No	No	No
Resumes must document experience in creating, entering and maintaining electronic applicant portfolios containing contact demographic and personal interest information.	No	No	No	No	No
Resumes must document experience in developing and presenting presentations to different types of audiences, collecting contact information from attendees, and providing follow-up information.	No	No	No	No	No
Resumes must document experience in building relationships with different organizations, agencies, programs and their alumni and stakeholders to generate applicants.	No	No	Yes	No	No
Resumes must document developing and presenting program status reports accompanied by statistical analysis, charts and graphs.	No	No	Yes	No	No
Resumes must document the vendor's experience in developing a marketing program to a targeted audience.	Yes, not clear but gave credit	Yes, credit for "extensive recruiting"	Yes	Yes	No
Resumes must document the vendor's experience in identifying potential applicants via social media, electronic job boards, search engines and traditional media and determining the best way to interest them in participating in a program.	No	No	No	No	No
Resumes must document the vendor's experience in developing marketing materials and distributing them in hard copy, electronically or posted on social	No	No	Yes	Yes	No

Corporation for National and Community Service

NationalService.gov



FROM: Gina Cross, Acting Director, AmeriCorps NCCC

THROUGH: Kim Mansaray, Chief of Program Operations

TO: Stuart Axenfeld, Assistant Inspector General for Audit

Date: June 22, 2018

SUBJECT: Agency Response to the s OIG's Revised Draft Management Alert of June 14, 2018

CNCS and AmeriCorps National Civilian Community Corps (NCCC) appreciate the independent review and concerns that the Office of Inspector General (OIG) identified in the revised Draft Management Alert of June 14, 2018: *Serious Weaknesses in National Civilian Community Corps Recruiting Contract May Jeopardize Program Success*. Ongoing and external reviews help strengthen CNCS operations.

The Management Alert was originally issued on April 12, 2018. CNCS responded on May 14, 2018. On May 16, 2018, the OIG issued the Management Alert as "Final." Because the original issuance did not denote that the Management Alert was a draft or was to be resolved according to the procedure established for audits, CNCS and the OIG met on June 1, 2018 to discuss the alert and clarify the procedure. Subsequently, the OIG reissued the Management Alert without substantive change, labeling the reissued Management Alert as "Draft." The reissued "Draft Management Alert" of June 14, 2018 failed to acknowledge the actions that CNCS has taken since April 12, 2018.

CNCS has begun the process of recompeting NCCC's recruitment contract in order to eliminate areas of risk associated with the procurement and will explore pursuing a performance-based contract. In the time since CNCS developed and competed this requirement, the Office of Procurement Services has strengthened its practices around the review of requirements that include deliverables with possible IT and cyber security considerations.

A recruitment contract is not a panacea for addressing all programmatic challenges. Generating applicant leads is a targeted element of a broader member recruitment strategy. Simply put: growing the pipeline of applicant leads will generate more members. CNCS will clearly define what an applicant lead is so that the connection to the broader programmatic strategy is clear. Generating leads is a strategy used by many recruiting offices, including similarly situated US Government agencies like Peace Corps. CNCS has determined that focusing the contract on applicant leads, will increase the number of applications and CNCS will maintain its alignment with best practices in the field of recruitment. We hope that the OIG will give due consideration to the differences in corporate recruiting and member recruiting as explained during the June 1, 2018 meeting and consider updating the recommendation on the relevant metrics before issuing its final management alert.

CNCS decided to engage an outside recruiter in order to supplement ongoing NCCC recruitment activities. The management alert incorrectly states that "[b]ecause NCCC recruitment personnel were unable to meet these crucial [recruitment] goals, NCCC decided to outsource the recruiting function and eliminate the internal positions." The decision to eliminate the recruitment positions was part of a larger overall strategic plan for improving NCCC operations. The recruitment staff substantially contributed to the statement of work by providing input during the drafting process, and by reviewing and editing subsequent drafts. And, as discussed during the June 1, 2018 meeting, NCCC staff with

recruitment experience did participate in the development of the statement of work.

By recompeting the contract, four of the OIG's recommendations will be substantively resolved. However, CNCS will maintain the current Contracting Officer's Representative (COR) for the new acquisition because, as discussed in the meeting, he is experienced, trained and well-suited for the job. The specific recommendations are addressed below:

1. Decline to exercise the recruitment contract options;

CNCS will decline to exercise option years on the recruitment contract and recompile the contract. **[Action Complete]**

2. Promptly undertake a new procurement, with clear objectives, statement of work, experience and professional attributes and deliverables which is structured as a performance-based contract, with metrics tied to recruitment of applicants who meet the program criteria, meet the diversity requirements and successfully complete their terms;

CNCS will undertake a new procurement and explore the use of a performance based contract. As discussed with the OIG on June 1, 2018, the specific metrics proposed in the recommendation are not appropriate for the recruitment of AmeriCorps NCCC members. The metrics will remain tied to applicant leads, consistent with best practices. Selection, placement, and successful completion of the program are separate processes, and not the purview of the recruitment contractor. **[In Process]**

3. Assign a COR who has strong recruitment knowledge and experience to effectively manage and oversee this contract;

The current COR is a successful and proven manager of many different types of contracts. His expertise in contract management, and his coordination with NCCC staff with recruitment experience, will continue to provide the strongest blend of skills for the maximum oversight of this award. **[Action Complete]**

4. Ensure that the selected contractor demonstrates the requisite past performance, meets all the technically acceptable evaluation criteria and has qualified personnel who all meet the Statement of Work (SOW) requirements; and

CNCS is in the process of recompeting the contract consistent with this recommendation. **[In Process]**

5. Provide bidders with the CNCS detailed cybersecurity requirements, policies and procedures, and have the CNCS CISO review the bidder's cybersecurity safeguards to ensure that it has the systems in place to maintain secure databases that meet applicable cybersecurity mandates and protect PII.

CNCS is in the process of recompeting the contract consistent with this recommendation. **[In Process]**