Acquisition and Procurement:
Company Has Opportunities to More Effectively Ensure That It Awards Contracts in Its Best Interest

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Memorandum

To: Tracie Winbigler
           Executive Vice President, Business Transformation
               and Chief Financial Officer

From: J.J. Marzullo
           Assistant Inspector General, Audits

Date: June 30, 2025

Subject: *Acquisition and Procurement: Company Has Opportunities to More Effectively Ensure That It Awards Contracts in Its Best Interest* (OIG-A-2025-007)

The Infrastructure Investment and Jobs Act[1] gives Amtrak (the company) access to new capital funding, and billions of these dollars will flow to contractors. Maximizing this taxpayer investment requires the company to consistently award contracts in its "best interest"—obtaining the highest quality goods and services at the lowest possible cost. Efforts to accomplish this begin in the first three phases of the procurement process: pre-solicitation, solicitation, and pre-award. During these phases, which we collectively refer to as the "pre-award phase," the company develops its needs and advertises to the market to seek full and open competition. Missteps during this phase can increase costs and the risk of fraud, as our prior work demonstrates.[2]

Our objective was to assess the extent to which the company has effective processes and controls during the pre-award phase to ensure contracts it awards are in its best interest. To accomplish this, we selected and reviewed company files for a sample of 10 contracts valued at $286 million and 10 purchase orders (PO) valued at $122 million. For the purposes of this report, we collectively refer to both as "contracts." We selected contracts the company awarded in fiscal year (FY) 2023 that were more than $250,000

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[1] Infrastructure Investment and Jobs Act, Pub. L. No. 117-58, 135 Stat. 429 (2021).
[2] *Insights on Fraud Risks as the Company Expands Its Mission* (OIG-SP-2023-007), May 15, 2023.

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and assessed their compliance with key provisions of the company's procurement manual.[3]

We also interviewed the 21 contracting officers (CO) associated with these contracts. These COs were responsible for more than two thirds of the value of the company's FY 2023 contract awards within the scope of this audit.[4] We also interviewed 23 contracting official's technical representatives (COTR).[5] To ensure that our work reflected current company practices, we asked these employees about their experiences over the last two years. In addition, we interviewed key stakeholders in the Procurement, Law, Finance, Capital Delivery, and Digital Technology departments. We also analyzed leading practices and internal control guidance from public- and private-sector sources related to pre-award procurement activities.[6] For additional information on our scope and methodology, see Appendix A.

SUMMARY OF RESULTS

The company has opportunities to improve processes to help ensure that it awards contracts in its best interest. Although we found that certain pre-award contracting activities generally worked well, we identified weaknesses in the following two areas that could place the company at greater risk of paying more than it should for goods and services:

- **Adhering to requirements for cost estimates and evaluation committees**. Of the 16 contracts we reviewed that required a cost estimate, 3 did not have one and

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[3] We assessed contract files based on the requirements of the company's procurement manual dated December 8, 2021, which was the version in effect during FY 2023. During our audit, the company updated the manual. We reviewed the revised version and found only minor changes to the sections on the pre-award phase. We compared the company's procurement manual to leading practices in targeted instances, but comparing the entire manual against leading practices was outside the scope of our audit.

[4] In FY 2023, the company awarded $1.42 billion in new procurements of more than $250,000. The COs we interviewed were collectively responsible for $965 million.

[5] During our audit, we learned that the company awarded eight POs in our sample prior to FY 2023; therefore, we replaced these POs. We included their responses in our analysis because we had already interviewed company officials working on these contracts, and their responses are still relevant to our audit objective.

[6] Association of Certified Fraud Examiners (sponsored by The Institute of Internal Auditors and The American Institute of Certified Public Accountants), *Managing the Business Risk of Fraud: A Practical Guide*; Government Accountability Office (GAO), *Cost Estimating and Assessment Guide, Best Practices for Developing and Managing Costs* (GAO-20-195G), March 2020; and GAO, *Fraud Risk Management Framework*, (GAO-15-593SP), July 2015.

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6 did not include details that leading practices suggest.[7] Our interviews with 21 COs revealed similar challenges across contracts they manage. In addition, for a third of the contracts we reviewed that required a committee to evaluate vendor proposals, the COs did not consistently follow company requirements for these committees, such as documenting conflicts of interest and changes in the evaluation committee composition. As a result, the company may not be fully assessing whether bids are fair and reasonable, which could increase costs.

- **Reducing fraud risk during the pre-award phase.** As we reported previously, leading practices in fraud risk management emphasize collecting and analyzing organization-wide procurement data to spot suspicious activity. The company, however, does not collect key data in a structured format that would help it detect common fraud schemes that occur during the pre-award phase, such as suppliers colluding on their bids. In addition, the company provides limited fraud training to employees involved in the pre-award phase. As a result, the company is less likely to detect the types of fraud our office has identified during this phase.

To improve in these areas, we recommend that the Procurement department (1) assess ongoing solicitations to determine their compliance with company requirements, (2) develop additional guidance for COs regarding cost estimate details, (3) collect and review pre-award data to identify fraud indicators, and (4) implement additional fraud training for employees involved in the pre-award phase.

In commenting on a draft of our report, the Executive Vice President, Business Transformation and Chief Financial Officer agreed with our recommendations and identified actions the company plans to take to address them. For management's complete response, see Appendix C.

BACKGROUND

According to the company's procurement manual, the contract procurement process consists of five phases, as Figure 1 shows. The focus of this report is the first three phases—pre-solicitation, solicitation, and pre-award—which we refer to collectively as the "pre-award phase."

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[7] Our assessment includes a review of contract files the company COs provided in response to our documentation requests from January to October 2024.

Figure 1: Contract Procurement Lifecycle
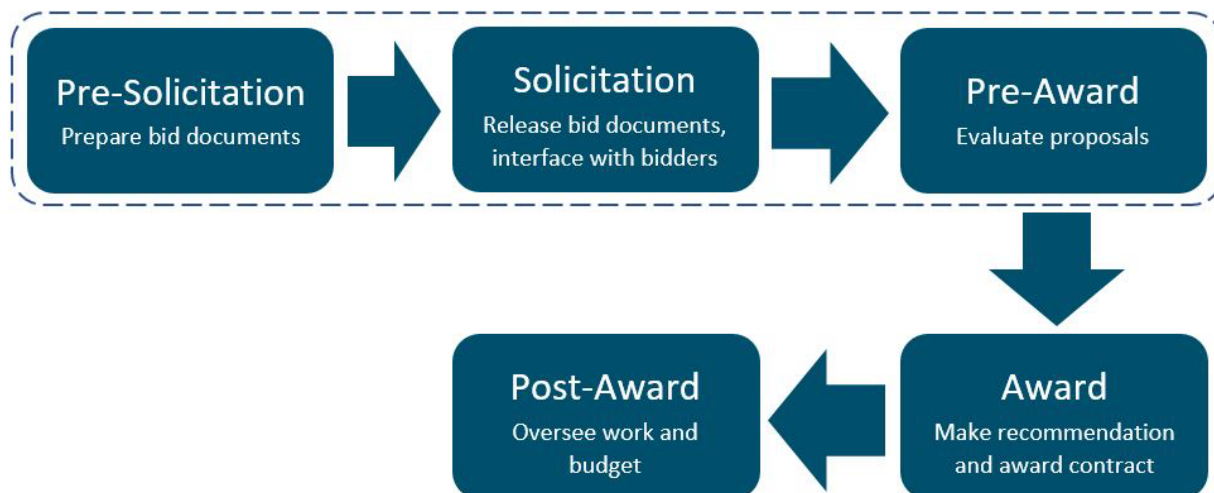
Source: OIG analysis of the company's procurement manual

Note: We analyzed the three phases outlined with the dashed line.

During the pre-award phase, company employees from the Procurement department and end-user departments—those requesting goods or services—have the following roles and responsibilities:

- **COs.** The primary responsibility of COs during the pre-award phase is to identify the highest quality goods or services that meet the company's requirements at the lowest possible cost. They are responsible for leading the solicitation process, including the negotiation, execution, and administration of the resulting contract between the company and its selected supplier. COs are part of the Procurement department, which reports to the Chief Financial Officer.

- **COTRs.** The primary responsibilities of COTRs during the pre-award phase are to develop the company's initial requirements—including detailed statements of work, cost estimates, and purchase requisitions—and submit those requirements to the Procurement department. COTRs are part of the end-user departments and typically have technical expertise in the goods or services the company is seeking.[8]

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[8] Amtrak, *Policy and Instruction Manual,* 11.64.3, Contracting Official's Technical Representative (COTR) Requirements, April 16, 2024.

- **Technical evaluation committees (TEC).** A TEC is a group of Amtrak employees, which sometimes includes contractors, who are responsible for evaluating technical aspects of suppliers' proposals. The company requires a TEC for any formal acquisition where the award criteria is not the lowest price. COTRs serve on the TEC and are responsible for identifying employees from across the company with the technical expertise to review and score suppliers' proposals. COs are responsible for managing these evaluation committees.[9]

The company's procurement manual and other guidance establish requirements for employees to follow throughout the procurement process, including during the pre-award phase.

COMPANY CAN BETTER ENSURE THAT EMPLOYEES ADHERE TO PRE-AWARD REQUIREMENTS

We found that certain aspects of the pre-award phase were generally working well, based on the 20 contracts we reviewed and interviews we conducted. For example, COs generally understood their roles throughout the phase. In addition, the company developed scopes of work with a level of detail in line with its minimum requirements.[10]

Nonetheless, we found that the company can better ensure that its employees adhere to its requirements[11] related to the pre-award phase in two areas—cost estimates and TECs.

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[9] Amtrak, *SOP-1018.01,* allows COs to appoint two tiers of TEC members. Tier 1 members are responsible for scoring and voting on proposals. Tier 2 members are responsible for providing technical expertise but are not permitted to vote. According to company policy, Tier 2 members should add value to the evaluation process and not simply observe for situational awareness.

[10] We did not assess the technical aspects of these scopes of work.

[11] We evaluated and are reporting company requirements that we determined were the areas of highest risk across the pre-award phase. (See Appendix A.)

Cost Estimates Missing or Did Not Follow Leading Practices

Of the 20 contract files we reviewed, 16 required cost estimates.[12] For these 16 contract files, we found the following:

- **Seven had cost estimates with sufficient details.** They included underlying information to facilitate the COs' evaluation of bids to ensure that they were fair and reasonable.

- **Three did not have a cost estimate**. Company policy requires a cost estimate to provide a benchmark from which COs can assess if bids are fair and reasonable.

- **Six had cost estimates of a single number.** Leading practices suggest that reliable estimates include details about the specific work an organization is procuring, including itemized costs for labor, materials, overhead rates, and any other significant cost elements.[13] Although the company's procurement manual allows end users to provide a simple budgetary estimate, it does not provide additional guidance on when this is acceptable or when supporting details are necessary. For these six, we determined that additional details such as labor and materials would have enabled a CO to more effectively evaluate if bids were fair and reasonable.[14]

For our analysis of cost estimates for these 16 contract files, see Figure 2.

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[12] Four contracts were master services agreements, which include the terms and conditions that govern task orders for future work. According to a senior Procurement department official, cost estimates are not required for initial master services agreement awards or for subsequent task order releases.

[13] GAO, *Cost Estimating and Assessment Guide, Best Practices for Developing and Managing Costs* (GAO-20-195G), March 2020.

[14] Leading practices also suggest that organizations reconcile their estimates with independent cost estimates. Independent cost estimates are prepared by a third party to serve as a benchmark for evaluating the internal estimates. (See GAO-20-195G.) At the time of our review, the company required independent cost estimates for each contract but has since changed this requirement. The company's current procurement manual states that COs "may wish to prepare a separate cost/price analysis memorandum analyzing the costs or prices proposed against the independent cost estimate prepared prior to solicitation." When we asked the COs under what circumstances they obtain independent cost estimates, their responses varied: eight COs told OIG they have never obtained one, and two COs said they always obtain one. An in-depth review of the company's cost estimating practices, however, was outside the scope of this review; rather, we focused on procurement manual requirements and basic cost estimate elements to ensure that COs could determine whether bids were fair and reasonable.

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Figure 2. Analysis of Cost Estimates for 16 Contract Files
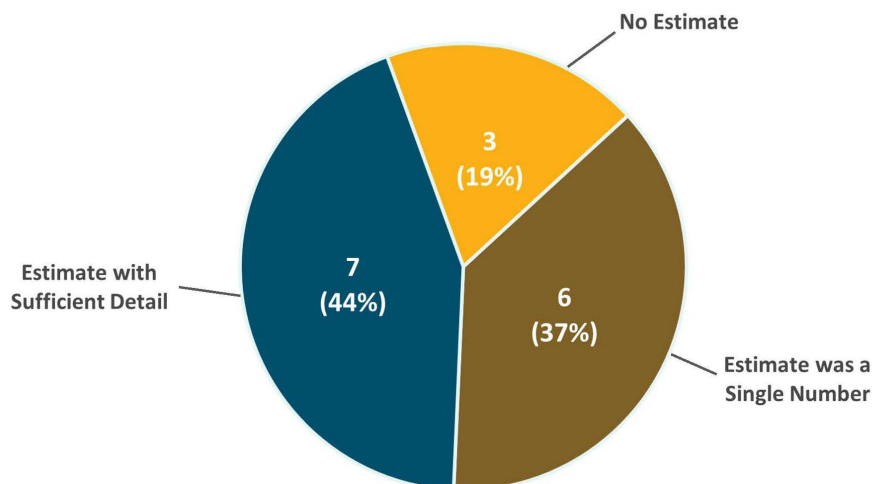
Source: OIG analysis of 20 contract files

Our interviews with Procurement department officials uncovered similar trends. For example, when we asked 21 COs to describe the extent to which the cost estimates of the end-user departments are adequately detailed to determine if the bids are reasonable, 16 responded "little extent" or "no extent."[15] When we asked COs what details are missing from estimates,[16] eight stated that they usually receive only a single number, and two said that they receive only a rough order of magnitude.[17]

> **16 of 21** contracting officers stated that cost estimates are not adequately detailed.

These weaknesses occurred because the Procurement department does not have the following: (1) a process for reviewing ongoing solicitations for compliance with company policy and (2) formal guidance for COs describing when it is acceptable for end-user cost estimates to include less detail than leading practices suggest. Although end-user departments are responsible for creating cost estimates, COs have the

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[15] During our interviews with COs, we asked them to rate their responses on a scale from one to four: a response of one indicated "great extent," two indicated "moderate extent," three indicated "little extent," and four indicated "no extent."

[16] The question we asked was, "What details are most commonly missing from cost estimates?"

[17] A rough order of magnitude is developed when a quick estimate is needed and few details are available. Usually based on historical information, it is typically developed to support what-if analyses and can be developed for a particular phase or portion of an estimate or the entire cost estimate, depending on available data. See GAO-20-195G.

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authority to request revisions. The company, however, has not provided guidance on when to do so. Without such a process and guidance, challenges with cost estimates may continue. As a result, the company is at increased risk of paying more than it should for goods and services, having to reprogram funds to cover increased costs, or having to re-solicit proposals with reduced scopes of work.

COs Did Not Consistently Follow Company Requirements for TEC Activities

The COs for the files we reviewed did not consistently follow company requirements for TEC activities.[18] These requirements help ensure that TEC members make decisions in the company's best interest and that comply with its ethical standards. Senior Procurement department officials similarly identified the TEC process as a high-risk aspect of the pre-award phase.

Of the 15 contract files we reviewed that had a TEC,[19] 5 were missing key documentation necessary to ensure that they operated as intended, as follows.[20]

- **Changing the TEC composition.** In four contracts, we found evidence of a change in the TEC's composition after the solicitation was issued, but the contract files did not document the changes and the reasons for them, as required.[21] The company requires a documented explanation for changes in TEC composition during solicitation to prevent the removal of members who offer

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[18] During our audit, the company twice updated requirements concerning TECs. The first update expanded requirements for Tier 2 members. These requirements were not in place during the scope period of our audit.

[19] Four of the 20 contract files did not require a TEC. For another contract file, only one bid was received. As a result, the company reviewed the technical and commercial components but did not convene a TEC.

[20] In addition to the two areas we describe, we identified risks related to potential direct reporting relationships between TEC members at the time of a solicitation. Company policy discourages the inclusion of members with direct reporting relationships. For five contracts in our sample, we identified direct reporting relationships at the time of our review, but we could not determine whether these relationships existed at the time of the solicitation because the company does not document historic reporting relationships. Accordingly, we are highlighting this as a risk for the company's awareness but are not making a recommendation in this area.

[21] Amtrak, *SOP-1018.00,* states that TEC membership should not change after being established and prior to disbursement of proposals without a documented explanation for the change. We identified changes in TEC composition based on our analysis of the members listed in the initial procurement checklist compared with the members listed in the technical scoring document, or because we found emails describing the changes.

dissenting opinions. Without documentation, we were unable to determine why the changes occurred or whether the company took the appropriate steps to ensure that the changes did not hinder the supplier evaluation process.

- **Documenting conflicts of interest.** In three contracts, the company was not able to provide signed disclosures for one or more of the TEC members in the contract file, as the company requires. These disclosures document the affirmation of committee members that they do not have conflicts of interest in the procurement. They provide the company greater assurance that members gave objective input and assessments in the company's interest. During our review, the company augmented its guidance on documenting conflicts of interest, which is a positive step.[22]

As with cost estimates, inconsistent adherence to company requirements for TECs occurred because the Procurement department does not have a process to assess ongoing solicitations for compliance with the company's procurement manual and other requirements. As a result, this places the company at greater risk of awarding contracts that are not in its best interest.

We have previously reported on inconsistent adherence to company requirements and TEC members acting in their own interest rather than the company's, including the following:

- In March 2025, we found that two senior company employees who were serving as Tier 1 members failed to disclose their familial relationship with an employee of a supplier whose bid they reviewed.[23]

- In December 2023, we reported that a senior management employee who served on a TEC failed to disclose two relationships with the supplier the committee selected as the awardee.[24]

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[22] In April 2025, the company updated its requirements for reviewing conflicts of interest. The company now requires that the CO document their review of TEC members' conflict of interest forms and their assessment as to whether any disclosures prohibit a member from serving on the TEC.

[23] *Two Employees Failed to Disclose a Potential Conflict of Interest* (OIG-WS-2025-326), March 24, 2025.

[24] *Senior Management Official Terminated for Failure to Disclose Relationship* (OIG-WS-2024-301), December 1, 2023.

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- In April 2020, we reported that an employee served on a TEC that evaluated the bid of a friend's company.[25]

More broadly, increasing the general rigor of the implementation of the TEC process in accordance with company requirements could help the company ensure that it obtains adequate competition. For example, in one file we reviewed, an evaluation committee decided to split an award into two contracts after reviewing and scoring the proposals. In fact, some members changed their scoring after the fact to align with this new award method after discussing this with other TEC members, which company requirements prohibit. Instead of issuing new solicitations for each service, however, the TEC considered only the suppliers whose proposals it had already rated as the best. As a result, the company may have missed out on proposals from suppliers that could bid on only one—but not both—bodies of work, potentially limiting competition.

Establishing a process to ensure that ongoing solicitations adhere to pre-award requirements would help the company prevent these types of incidents and reduce the risk that it awards contracts that are not in its best interest.

COMPANY IS MISSING OPPORTUNITIES TO REDUCE FRAUD RISK DURING THE PRE-AWARD PHASE

The company has opportunities to better identify and mitigate fraud risks that can occur during the pre-award phase, in line with leading fraud risk management practices.[26] Specifically, the company (1) is not collecting and analyzing data for its pre-award activities to identify fraud indicators and (2) is not effectively training employees to detect the types of procurement fraud they may encounter during pre-award.

Company Is Not Collecting and Analyzing Pre-award Data to Identify Potential Fraud

In April 2024, we reported on insights from our work and industry practices about the importance of collecting and analyzing data to detect contract and procurement fraud.[27] For example, some fraud schemes we identified that can occur during the pre-award phase involve collusion between two or more suppliers about when and how much to

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[25] *Employee Terminated for Violation of Conflict of Interest Policy* (OIG-WS-2020-323), April 23, 2020.

[26] OIG-SP-2024-005 and OIG-SP-2023-007.

[27] OIG-SP-2024-005.

bid. A July 2024 internal company assessment also identified fraud schemes during the pre-award phase that pose a potential risk.

To detect such schemes, leading organizations collect their procurement data in a structured format and then analyze these data to identify indicators of fraud, particularly those that span multiple solicitations. In our 2024 report, we identified 38 data elements that could be used for this purpose. They include which suppliers bid, the details of their bids, and their history of bidding on other solicitations. For example, to identify whether a group of bidders has a winning and losing pattern across multiple procurements—an indicator of a bid rotation scheme—leading organizations collect information on all bids (including bidders' names, addresses, and bid price details) and analyze these data to identify suspicious patterns across solicitations.

The company, however, is not collecting these data consistently or in a centralized location because it has not established a process for doing so. As a result, it is missing opportunities to analyze these data companywide to identify potential fraud.[28] In September 2024, the company issued a notice to proceed for the development of a contract lifecycle management system, which is a positive step in line with our prior recommendations.[29] This system, however, will not capture most data elements that leading fraud risk management practices suggest. Senior Procurement department officials acknowledged that the new system will not initially capture these data elements and will act more as a repository for contract files. Developing a process to consistently collect and review more of these pre-award data elements would help the company mitigate its fraud risk.

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[28] We previously reported that the company's electronic procurement system did not act as a fully functioning contract repository. In the absence of such a repository, COs were storing contract files and supporting documentation in multiple systems, including SharePoint and on their personal drives. See *Acquisition and Procurement: Company's Electronic Procurement System Limits Effective Contract Oversight* (OIG-MAR-2022-013), August 16, 2022.

[29] *Safety and Security: Company Faces Impediments Identifying and Managing Private Security Contractors* (OIG-MAR-2023-009), June 23, 2023; *Acquisition and Procurement: Company's Electronic Procurement System Limits Effective Contract Oversight* (OIG-MAR-2022-013), August 16, 2022; and *Acquisition and Procurement: Contracts Included Key Provisions to Reduce Risks, but the Company Lacks an Efficient and Effective Contract Management System* (OIG-A-2018-003), February 22, 2018.

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Company Is Not Effectively Training Employees to Detect Fraud in the Pre-award Phase

The company is also missing opportunities to mitigate the risk of fraud because it has not developed mandatory training on all of the fraud schemes and indicators that can occur in the pre-award phase.

Leading fraud risk management practices state that organizations should train their employees on the specific types of fraud schemes they are likely to encounter.[30] Recent research assessed more than 1,900 occupational fraud cases[31] and found that more than 22 percent of these cases were detected as a result of tips from employees, and that tips were twice as likely to come from employees who received fraud awareness training than from employees who did not.[32]

The company, however, does not provide mandatory fraud training covering all schemes in the pre-award phase, which a senior Procurement department official confirmed. Accordingly, when we asked COs what training they receive about fraud in the pre-award phase,[33] they provided the following examples of training that we found to be insufficient:

- **On-the-job.** COs cited receiving on-the-job fraud-related training, such as from a supervisor or the predecessor to their role, but this is not standard practice across the Procurement department.

- **Mandatory.** COs cited the mandatory annual conflict-of-interest or annual fraud trainings that the company provides to all employees. During our audit, the company updated the fraud training with additional information related to the pre-award phase. However, the updated information still did not include all of the fraud schemes and indicators occurring in the pre-award phase. In addition, the conflict-of-interest training does not specifically address fraud schemes.

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[30] GAO, *A Framework for Managing Fraud Risks in Federal Programs*, GAO-15-593SP, July 2015.

[31] The Association of Certified Fraud Examiners defines "occupational fraud" as the use of one's occupation for personal enrichment through the deliberate misuse or misapplication of the employing organization's resources or assets. See Association of Certified Fraud Examiners, *Occupational Fraud 2024: A Report to the Nations*, 2024.

[32] See *Occupational Fraud 2024: A Report to the Nations*, 2024.

[33] We asked, "What training have you received [on fraud]?"

- **Voluntary.** COs cited voluntary sessions such as the "lunch-and-learn" outreach our office provides. The company also offered a more robust fraud course on an ad hoc basis.[34] Participation in these sessions and courses, however, is voluntary and they are offered only intermittently.

Similarly, when we asked COTRs, they said they had not received such training or cited the company's annual fraud or COTR training,[35] neither of which fully addresses the potential for fraud during the pre-award phase. Instead, when staff are aware of such schemes and prevention methods, it is typically a result of their experience at previous employers, according to a senior Finance department official.

Without sufficient training, company employees involved in pre-award phase activities may not have the awareness necessary to detect and identify potential schemes. For example, only 1 of the 21 COs we interviewed cited proactive steps they take to identify potential collusion among bidders. Further, when asked what tools they had to help prevent and detect fraud, one CO said they did not know what kind of schemes could occur in the pre-award phase; and another told us they did not think fraud prevention tools applied to their work—indications of a lack of awareness about these issues.

CONCLUSIONS

The company has opportunities to improve its processes to help ensure that the contracts it awards are in its best interest. Assessing ongoing solicitations for compliance with its requirements and providing additional guidance related to cost estimates would help the company ensure that it is obtaining the highest quality goods and services at the lowest possible cost. Further, collecting and analyzing pre-award data and providing mandatory and recurring fraud training for employees involved in competitive solicitations would help it mitigate the risk of fraud during the pre-award phase.

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[34] For example, in June 2024, the Finance department offered a training session that discussed a case study involving fraud during the pre-award phase. We view this as a positive step, but the session was only a one-time occurrence, and participation was voluntary.

[35] We asked 23 COTRs, "What training, if any, have you received to identify potential fraud during the pre-award phases of a solicitation?" In response, 9 said they had not received any training, and 12 said they had received the fraud prevention or COTR training. In addition to these responses, some of the COTRs generally cited trainings like "Procurement" or "compliance" trainings but did not identify course names.

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RECOMMENDATIONS

To improve the effectiveness of the company's processes and controls during
the pre-award phase, we recommend that the Executive Vice President, Business
Transformation and Chief Financial Officer, in consultation with the Vice President,
Chief Procurement and Supply Chain Officer—and in coordination with leadership of
end-user departments—take the following actions for competitive solicitations:

1. Develop and implement a process to assess ongoing solicitations for compliance
   with the company's procurement manual.

2. Develop and implement additional guidance to help COs determine when to
   require end users to provide more detailed cost estimates, in line with leading
   practices, and consider adjusting its policies accordingly.

3. Implement a companywide process to consistently collect and analyze key
   pre-award data elements, such as those we raised for the company's
   consideration in our April 2024 report, as necessary to identify indicators of
   fraud.

4. Develop and implement mandatory, recurring fraud training for employees
   involved in the pre-award phase. At a minimum, this training should include
   how to detect indicators of the fraud schemes that most commonly occur during
   this phase.

MANAGEMENT COMMENTS AND OIG ANALYSIS

In commenting on a draft of our report, the Executive Vice President, Business
Transformation and Chief Financial Officer, agreed with our recommendations and
identified actions the company plans to take to address them, which we summarize
below:

- **Recommendation 1:** Management agreed with our recommendation to develop
  and implement a process to assess ongoing solicitations for compliance with the
  company's procurement manual. To achieve this, management stated that the
  Procurement department will enhance its solicitation compliance framework,
  conduct regular audits and reviews of ongoing solicitations, and provide training
  and awareness programs to employees. The target completion date is
  December 31, 2026.

- **Recommendation 2:** Management agreed with our recommendation to develop and implement additional guidance to help COs determine when to require more detailed cost estimates, in line with leading practices. Management stated that the Procurement department will strengthen guidance for when more detailed cost estimates are necessary. It plans to achieve this by defining clear thresholds and criteria for cost estimates, introducing standardized cost estimation templates, and using historical pricing data to validate cost estimates. The target completion date is December 31, 2026.

- **Recommendation 3:** Management agreed with our recommendation to implement a companywide process to collect and analyze pre-award data, such as those we raised for the company's consideration in our April 2024 report, to identify indicators of fraud. Management stated that the Procurement department will use its existing software systems to obtain data. Then its analytics team will run regular and ad hoc reporting to identify potential fraud. The target completion date is December 31, 2026.

- **Recommendation 4:** Management agreed with our recommendation to develop and implement mandatory, recurring fraud training for employees involved in the pre-award phase. Management stated that the Procurement department will implement such training for its employees and take additional steps to help them identify fraud, including defining core fraud indicators and adjusting its policies to incorporate fraud risk management requirements. The target completion date is December 31, 2026.

For management's complete response, see Appendix C. Management also provided technical comments that we have incorporated into this report as appropriate.

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APPENDIX A

Objective, Scope, and Methodology

This report provides the results of our audit of the company's pre-award phase. Our objective was to assess the extent to which the company has effective processes and controls during the pre-award phase to ensure contracts it awards are in its best interest. Our scope included contracts and POs the company awarded during FY 2023 above the company's competition threshold of $250,000. We conducted our work from December 2023 through June 2025 in Washington, D.C., and Philadelphia, Pennsylvania.

To assess the effectiveness of the company's pre-award processes and controls to ensure that the contracts it awards are in its best interest, we reviewed and analyzed relevant company requirements, including the company's procurement manual and related standard operating procedures. We also identified and reviewed targeted leading practices related to cost estimating[36] and fraud detection[37] during the pre-award phase. Additionally, we interviewed company stakeholders in the Procurement, Capital Delivery, Finance, Digital Technology, and Law departments to understand their perspectives on pre-award phase processes and controls, including what they identified as areas of risk.

We first identified company contracts and POs[38] awarded in FY 2023 above the competition threshold of $250,000. These totaled approximately $981 million for contracts and approximately $595 million for POs. In our report, we collectively refer to contracts and POs as "contracts." We then judgmentally selected a sample of these contracts to assess their compliance with key provisions of the company's procurement manual during the pre-award phase.

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[36] GAO-20-195G.

[37] Association of Certified Fraud Examiners, *Occupational Fraud 2024: A Report to the Nations*, 2024; and GAO, *A Framework for Managing Fraud Risks in Federal Programs*, GAO-15-593SP, July 2015.

[38] We previously reported on limitations of the company's electronic procurement system, which necessitated development of separate data sets for contracts and POs to develop our audit population. See *Acquisition and Procurement: Company's Electronic Procurement System Limits Effective Contract Oversight* (OIG-MAR-2022-013), August 16, 2022.

Before selecting our sample, we excluded some contracts from this population, including the following:

- We excluded contracts from the following programs because we have prior or ongoing work assessing them: the Gateway Program, New Acela, the Americans with Disabilities Act, the Frederick Douglass Tunnel, and the procurement of new long-distance trainsets.

- We also excluded contracts that are the subject of active investigations by our office, as well as contracts that are not subject to the company's procurement process, such as host railroad agreements and outside counsel services for the Law department.

To assess compliance with key provisions of the company's procurement manual during the pre-award phase, we selected a sample of 20 contracts. To develop a broad companywide sample, we selected a mix of contracts based on the following factors:

- dollar value

- type of contract (construction or services)

- company department

- contracting officer

We initially selected four contracts as an exploratory sample.[39] We then selected and reviewed an additional eight contracts and nine POs to review. While reviewing the associated files, we identified concerns with the reliability of the award date for POs. (For additional detail about computer-processed data, see the discussion below.) Ultimately, to ensure that we selected POs awarded in FY 2023, we created a dataset of POs using company data; we found that eight of our originally selected POs were not issued in FY 2023, and we replaced them.

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[39] After reviewing the files for these contracts and interviewing their COs and COTRs, we removed one because we determined it was not subject to the company's standard process for competitive procurements.

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The following is our final sample:[40]

- 10 contracts valued at about $286 million—35 percent of the $810 million in contracts after the exclusions described above

- 10 POs valued at about $122 million—22 percent of the $556 million in POs after the exclusions described above

Since our sample of contracts was non-generalizable, the results we report may not be reflective of the entire population of contracts from which our sample was selected.

To ensure the consistency of our work, we developed a data collection instrument (DCI) to review contract file contents against company requirements and structured interview questions for COs and COTRs. (For a discussion of development of the DCI and key areas of risk, see below.) We compared the manual's requirements to leading practices for cost estimates, but comparing the entire manual against leading practices was outside the scope of our audit.

Development of a DCI for contract file reviews. To determine the company's compliance with key provisions in its policies throughout the pre-award phase, we reviewed relevant company requirements, including the procurement manual and related procedures. We initially identified 91 key provisions and evaluated the compliance of our exploratory sample contracts against them. We then reassessed areas of risk and narrowed the key provisions to 60. For the full results of our analysis of contract files using this DCI, see Appendix B.

Development of questions for semi-structured interviews. We developed a series of questions for semi-structured interviews with the COs and COTRs associated with the contracts in our sample. We internally pre-tested the questions to verify that they were clear and then revised the questions accordingly. We asked COs and COTRs about their experiences over the past two years related to the pre-award phase and specific questions related to sampled contracts. These interviews allowed us to collect consistent

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[40] We determined that eight POs we initially selected originated prior to FY 2023 and were outside our scope; therefore, we excluded these from our sample. For additional details on how we determined whether these POs were out of scope and the other steps we took to validate our population data, see our discussion below in the section on assessing the reliability of computer-processed data. We also determined that two contracts we initially selected did not go through a full pre-award process because of the nature of the goods or services the company was procuring, as company policy allows; therefore, we removed these from our sample as well.

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information and illustrative examples of what employees thought worked well or could be improved during the pre-award phase. For some questions, we developed a four-point scale for interviewees to use when answering to allow us to better analyze their responses. We used this information to validate observations from our contract file reviews.

Identification of interviewees. Using reports the company generated from Ariba on Demand—its electronic procurement system—we identified the COs and COTRs for our sampled contracts. In some instances, the COs or COTRs had changed between the contract award and our review. In these cases, we interviewed the current CO or COTR because our semi-structured questions focused on their overall experiences during the past two years. During our audit, we learned that the company awarded some of the POs in our sample prior to FY 2023; therefore, we replaced them. We had already interviewed company officials working on these contracts, and their responses related to their overall experiences with the procurement process during the past two years and were relevant to our audit objective, therefore we included them. In total, we conducted interviews with 21 COs and 23 COTRs.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Internal Controls

We reviewed the internal controls for the company's pre-award phase. We assessed the internal control components and underlying principles and determined that the following internal control areas, among others, were significant to our audit objective:

- **Control Environment.** Management should establish an organization structure, assign responsibility, and delegate authority to achieve the entity's objectives.

- **Risk Assessment.** Management should identify, analyze, and respond to risks related to achieving the defined objectives.

- **Control Activities.** Management should design control activities and the entity's information system to achieve objectives and respond to risks.

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- **Monitoring.** Management should remediate identified internal control deficiencies on a timely basis.

- **Information and Communication.** Management should use quality information to achieve the entity's objectives and should communicate the necessary quality information internally.

We performed audit work to ensure that we assessed each of these control areas. Specifically, we identified and reviewed company processes and controls during the pre-award phase. We also identified roles and responsibilities and assessed the extent to which they were clearly defined. We also analyzed contract data for FY 2023 to identify when the company might have split an award of more than $250,000 into multiple smaller transactions to circumvent the company competition requirements. We identified 24 potential contracts and provided them to Procurement department officials. These officials reviewed the files and provided justifications for why each of the contracts were split. We did not take further steps to review the Procurement department's analysis.

Our review was limited to the internal control components and underlying principles that were relevant to our audit objective. We did not review the company's overall system of controls; therefore, our review may not have disclosed all internal control deficiencies that may have existed at the time of this audit.

Computer-processed Data

We used computer-processed data to identify and assess company contracts and POs, and we conducted the following assessments to ensure that the data were reliable.

Assessment of data reliability for the overall population. As we previously reported,[41] the company's electronic procurement system, Ariba on Demand, is not operating as a centralized and automated repository for storing its procurement contracts. Therefore, identifying the full population of the company's contractual commitments required separate reports for contracts and POs. We met with data owners in the Procurement and Supply Chain department who provided two sets of reports from Ariba on

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[41] *Safety and Security: Company Faces Impediments Identifying and Managing Private Security Contractors* (OIG-MAR-2023-009), June 23, 2023; and *Acquisition and Procurement: Company's Electronic Procurement System Limits Effective Contract Oversight* (OIG-MAR-2022-013), August 16, 2022.

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Demand: one for contracts, and one for POs. They told us that these data represented the complete population of new awards in FY 2023.

We took additional steps to confirm the reliability of these data to select the sample for our contract file review, including checking the number of records and key fields for completeness. We found some cases with multiple appearances of contract numbers. We discussed these cases with the data owners and found that the reasons for the multiple appearances were appropriate. After we selected our sample and obtained the associated documentation, we identified information in the contract files related to the issuance date that caused us to question whether the data the company provided represented our target population. Accordingly, we developed a report using data from SAP—the company's financial system of record—to identify the award date and reassess both the contract data and PO data. We took the following steps to determine the reliability of this report.

Assessment of data reliability for contracts. We interviewed the Procurement and Supply Chain department officials who were responsible for the data and reports. In addition, we checked certain elements against the actual underlying documents contained in the company records for each contract in our sample. Based on these steps, we determined that the data we used to select our sample of contracts were sufficiently reliable for this purpose.

Assessment of data reliability for POs. We determined that the reports the company provided did not represent all of the POs awarded in FY 2023, the target population we intended to study. Specifically, we found that the reference to "date" in the data changes upon certain contractual actions, such as the issuance of change orders. As a result, the data did not allow us to identify our target population. We discussed this issue with Procurement and Supply Chain department officials, and they confirmed that this is a known reporting limitation of Ariba on Demand. To mitigate this issue, we combined Ariba on Demand data with SAP data. Using data from both sources, we selected our sample of POs. We provided our methodology to data owners in the Procurement and Supply Chain department, who concurred that our report represented the population of new POs awarded in FY 2023. We also reviewed the solicitation history in Ariba on Demand for POs in our sample and confirmed that they were new awards made in FY 2023. In addition, we verified other data fields by determining that data in the contract files were consistent with data in the PO report we generated. Based

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on these steps, the data we ultimately generated for POs were sufficiently reliable for our purpose of selecting a non-generalizable sample.

Prior Reports

In conducting our analysis, we reviewed and used information from the following OIG reports:

- *Two Employees Failed to Disclose a Potential Conflict of Interest* (OIG-WS-2025-326), March 24, 2025

- *Amtrak: Additional Insights on Fraud Risks as the Company Increases Its Contracts and Procurements* (OIG-SP-2024-005), April 15, 2024

- *Senior Management Official Terminated for Failure to Disclose Relationship* (OIG-WS-2024-301), November 1, 2023

- *Safety and Security: Company Faces Impediments Identifying and Managing Private Security Contractors* (OIG-MAR-2023-009), June 23, 2023

- *Insights on Fraud Risks as the Company Expands Its Mission* (OIG-SP-2023-007), May 15, 2023

- *Acquisition and Procurement: Company's Electronic Procurement System Limits Effective Contract Oversight* (OIG-MAR-2022-013), August 16, 2022

- *Financial Management: Improving Payment Request Controls Could Provide a Better Value for Purchases and Protect the Company's Interests* (OIG-A-2022-010), June 15, 2022

- *Manager Terminated for Discussing Bid Strategies with Vendor* (OIG-WS-2022-319), March 30, 2022

- *Employee Terminated for Violation of Conflict of Interest Policy* (OIG-WS-2020-323), April 23, 2020

- *Amtrak Contracting Officer Sentenced in $7.6M Contract Steering Scheme* (OIG-I-2019-304), January 22, 2019

- *Acquisition and Procurement: Contracts Included Key Provisions to Reduce Risks, but the Company Lacks an Efficient and Effective Contract Management System* (OIG-A-2018-003), February 22, 2018

APPENDIX B

Complete Results of Contract File Reviews

We developed a data collection instrument to review the contract files we selected for our sample. Based on our review of the company's procurement manual and requirements, we identified the requirements in Table 1 as those related to the pre-award phase. We then analyzed whether each component was present in the 20 contract files in our sample. The absence of certain contract file components does not automatically indicate noncompliance with company requirements; rather, we used this analysis to identify areas for additional audit work.

Of the 20 contracts in our non-generalizable sample, 19 were solicitations for services, and 1 was a solicitation for supplies and equipment. The contracts resulted from solicitations for the following:

- five for construction services

- three for management, business professionals, and administrative services

- three for information technology services

- two for busing, shuttle, and ground transportation services

- one for professional engineering services

- one for software maintenance and support

- one for environmental services

- one for power generation and distribution machinery

- one for structures and building construction, materials, and supplies

- one for rolling stock undercarriage systems and components

- one for building and facility maintenance and services

Table 1 summarizes our findings from our review of the files for the 20 contracts in our sample.

Table 1: OIG Assessment of 20 Contract Reviews
for Compliance with Company Requirements

Contract File Component (*Contract file component is not a requirement.)	Count of Applicable Contract Files that Met Requirement	Percent of Applicable Contract Files that Met Requirement
For Suppliers and Equipment		
Statement of Work/Specs/Drawing	1 of 1	100%
Quantity of Units	1 of 1	100%
Deliverables	1 of 1	100%
Requested Delivery Date/Performance Period	1 of 1	100%
Shipping Terms	0 of 1	0%
Cost Estimate	1 of 1	100%
Budget	1 of 1	100%
Justification of Business Need	1 of 1	100%
Account Coding	1 of 1	100%
For Services		
Statement of Work	18 of 19	95%
Period of Performance	18 of 19	95%
Supplier Accountability/Performance Standards	17 of 19	89%
Cost Estimate	12 of 19	63%
Budget	13 of 19	68%
Justification of Business Need	14 of 19	74%
CO Review of Purchase Requisition & Requirements		
Does the Business Unit have a fully developed scope of work?	20 of 20	100%

Contract File Component (*Contract file component is not a requirement.)	Count of Applicable Contract Files that Met Requirement	Percent of Applicable Contract Files that Met Requirement
If any late bids were accepted, is there a waiver signed by the Vice President, Procurement and Supply Chain?	1 of 5	20%
Did the CO build a bidder list?	17 of 20	85%
Does the contract file show evidence that an independent cost estimate was developed?*	2 of 20	10%
Solicitation		
Are all bidder questions and answers compiled into one document?	15 of 20	75%
Are changes to the scope of work, specs, or terms published as an addendum to the solicitation?	10 of 11	91%
TEC		
If acquisition is based on any criteria other than low price, was a TEC convened?	15 of 20	75%
Did the CO determine use of a technical score, pass/fail, or commercial score?	14 of 15	93%
Does the TEC have at least three members?	15 of 15	100%
Is the COTR identified and serving as a TEC member?	11 of 15	73%
If TEC composition changed prior to distribution of proposals, is the change documented?	0 of 4	0%
Are there any direct reporting relationships between TEC members?*	10 of 15	67%
Did each TEC member sign Conflict of Interest and Non-Disclosure Agreement?	12 of 15	80%
Were the forms signed before review of proposals?	9 of 15	60%

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Contract File Component (*Contract file component is not a requirement.)	Count of Applicable Contract Files that Met Requirement	Percent of Applicable Contract Files that Met Requirement
Did any TEC member notify CO of a (potential) conflict they became aware of during the TEC process?*	3 of 15	20%
Did each TEC member receive the solicitation, scope of work, and each technical proposal?	11 of 15	73%
Did the TEC review only the technical qualifications of Proposals?	14 of 15	93%
Instructions to Offerors		
Is there a clear deadline for submittal of proposals?	19 of 20	95%
Are there clearly defined requirements for proposals: technically?	20 of 20	100%
Are there clearly defined requirements for proposals: formatting?	18 of 20	90%

Source: Amtrak OIG analysis of 20 contract files.

Note: The center column shows the count of applicable contract files that contain the component.

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APPENDIX C

Management Comments

Memo

AMTRAK

Date:	June 16, 2025	From:	Tracie Winbigler, EVP Business Transformation & CFO
To:	John Marzullo, Assistant Inspector General, Audits	Department(s):	Finance
		cc	Roger Harris, President
			Kuvesh Ayer, VP CPO & SCO
			Eliot Hamlisch, EVP Marketing & CCO
			William Herrmann, EVP Chief Legal and Human Resources Officer (CLHRO)
			Laura Mason, EVP Capital Delivery
			Jennifer Mitchell, EVP Strategy & Planning
			Steven Predmore, EVP CSO
			Gerhard Williams, EVP Service & Delivery Ops
			Christian Zacariassen, EVP CIO

Subject: Management Response to *Acquisition and Procurement:* Company Has Opportunities to More Effectively Ensure That It Awards Contracts in Its Best Interest (Draft Audit Report for Project No. 005-2024).

This memorandum provides Amtrak's response to the draft interim audit report titled, "Company Has Opportunities to More Effectively Ensure That It Awards Contracts in Its Best Interest". Management agrees with all the noted OIG recommendations below and appreciates the opportunity to provide a response.

To improve the effectiveness of the company's processes and controls during the pre-award phase, the OIG recommends that the Executive Vice President, Business Transformation and Chief Financial Officer, in consultation with the Vice President, Chief Procurement & Supply Chain Officer—and in coordination with leadership of end-user departments—take the following actions for competitive solicitations:

Recommendation #1:

Develop and implement a process to assess ongoing solicitations for compliance with the company's Procurement Manual.

NATIONAL RAILROAD PASSENGER CORPORATION

Management Response/*Action Plan*: Amtrak agrees with this recommendation, as ensuring compliance with our Procurement policies and best practices is essential to maintaining transparency, regulatory adherence, and operational efficiency.

To achieve this, Procurement will implement or enhance the following criteria:
- Enhance our Solicitation Compliance Framework – Define clearer criteria for compliance assessments of solicitations based on key Procurement Manual provisions, outlining checkpoints at critical stages of the solicitation process for both Procurement and requesters.
- Regular Audits & Reviews – Conduct periodic evaluations of ongoing solicitations, ensuring alignment with established policies and identifying areas for improvement.
- Training & Awareness Programs – Equip procurement teams with the necessary guidance to effectively interpret and apply updates to compliance standards, reducing errors and inconsistencies.

Responsible Amtrak Official(s): Kuvesh Ayer, VP Chief Procurement Officer

Target Completion Date: December 31, 2026

Recommendation #2:

Develop and implement additional guidance to help COs determine when to require end users to provide more detailed cost estimates, in line with leading practices, and consider adjusting its policies accordingly.

Management Response/*Action Plan*: Amtrak agrees with this recommendation. Amtrak Procurement will strengthen its guidance for Contracting Officers (COs) and requesters around when more detailed cost estimates are necessary. Aligning these efforts with Procurement best practices can enhance procurement accuracy, promote financial responsibility, and improve decision-making.

To achieve this, Procurement will implement or enhance the following criteria:
- Define Clear Thresholds and Criteria: Establish or redefine specific scenarios where more detailed cost estimates are necessary and provide guidance to ensure both flexibility and consistency across procurement processes.
- Introduce Standardized Cost Estimation Templates: Provide COs and end users with structured templates to capture required details, fostering clarity and uniformity in estimates.
- Leverage Market Research and Benchmarking: Encourage COs to use historical pricing data, industry standards, and comparative analyses to validate cost estimates before approval.

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NATIONAL RAILROAD PASSENGER CORPORATION

Responsible Amtrak Official(s): Kuvesh Ayer, VP Chief Procurement Officer

Target Completion Date: December 31, 2026

Recommendation #3:

Implement a companywide process to consistently collect and analyze key pre-award data elements, such as those we raised for the company's consideration in our April 2024 report, as necessary to identify indicators of fraud.

Management Response/Action Plan: Amtrak agrees with this recommendation. Amtrak Procurement will utilize existing Procurement software systems to obtain fraud indicating data, as identified by Amtrak's OIG April 2024 report, including, but not limited to, Ariba, SAP, Tableau, and iCertis. Amtrak's analytics team will provide regular and/or ad hoc reporting on contract pre-award data to identify potential fraud.

Responsible Amtrak Official(s): Kuvesh Ayer, VP Chief Procurement Officer

Target Completion Date: December 31, 2026

Recommendation #4:

Develop and implement mandatory, recurring fraud training for employees involved in the pre-award phase. At a minimum, this training should include how to detect indicators of the fraud schemes that most commonly occur during this phase.

Management Response/Action Plan: Amtrak agrees with this recommendation. Amtrak will implement mandatory pre-award fraud training for Procurement staff involved in the pre-award phase. This additional training will provide staff with the tools and knowledge to help detect and prevent fraud schemes that commonly arise during the pre-award phase.

To achieve this, Procurement will implement the following criteria:
- Define Core Fraud Indicators: Educate employees on red flags related to bid rigging, collusion, bribery, kickbacks, and misrepresentation, using real-world case studies for better comprehension.
- Leverage Cross-Functional Expertise: Engage compliance officers, legal advisors, and forensic auditors in training sessions to provide diverse perspectives and deeper insights.
- Ensure Policy Alignment: Adjust procurement policies to incorporate fraud risk management requirements, ensuring consistency between training and operational guidelines.

Responsible Amtrak Official(s): Kuvesh Ayer, VP Chief Procurement Officer

Target Completion Date: December 31, 2026

APPENDIX D

Abbreviations

the company	Amtrak
CO	contracting officer
COTR	contracting official's technical representative
DCI	data collection instrument
FY	fiscal year
GAO	Government Accountability Office
PO	purchase order
TEC	technical evaluation committee

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APPENDIX E

OIG Team Members

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Joseph Zammarella, Senior Auditor, Lead

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Alejandra Rodriguez, Senior Manager, Data Analytics

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OIG MISSION AND CONTACT INFORMATION

Mission

The Amtrak OIG's mission is to provide independent, objective oversight of Amtrak's programs and operations through audits and investigations focused on recommending improvements to Amtrak's economy, efficiency, and effectiveness; preventing and detecting fraud, waste, and abuse; and providing Congress, Amtrak management, and Amtrak's Board of Directors with timely information about problems and deficiencies relating to Amtrak's programs and operations.

Obtaining Copies of Reports and Testimony
Available at our website www.amtrakoig.gov

Reporting Fraud, Waste, and Abuse
Report suspicious or illegal activities to the OIG Hotline
www.amtrakoig.gov/hotline

or

800-468-5469

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