Limited Scope Evaluation: GSA Office of Administration Services Contracting Officer Warrants and FAC-C Certifications

Report Number
JE15-007
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Introduction

The Office of Inspections and Forensic Auditing conducted a limited scope evaluation of contracting officer (CO) warrants and Federal Acquisition Certifications in Contracting (FAC-C) designations held by acquisition personnel within the GSA Office of Administrative Services (OAS). The objective of this limited scope evaluation was to assess whether OAS contracting officers holding a FAC-C Level III certification complied with the core requirements for education, training, and experience under the FAC-C Program applicable to all executive Federal agencies with warranted contracting officers, except Department of Defense.

The evaluation was initiated as a result of an Agency management alert memorandum dated October 29, 2013 regarding OAS contracting officers' certifications, and compliance with the requirements of the FAC-C Certification Program.

Results in Brief

Our evaluation found a weakness in the Federal Acquisition Institute Tracking Application System (FAITAS) that permits acquisition professionals to improperly select and designate their approving supervisor. We also identified instances where there was either no record or insufficient documentation supporting evidence of a contracting officer's training.

What the OIG Recommends

The OIG recommends that OAS ensure all CO training requirements are met and accurately recorded in FAITAS in a timely manner and establish adequate controls to prevent COs from having unlimited discretion in selecting a supervisor for approving their actions. The Chief Administrative Services Officer concurred with our recommendations. Management's comments can be found in their entirety in the Appendix.

Background

The Federal Acquisition Institute (FAI) designated FAITAS, an online centralized database, as the required acquisition career management system for federal civilian agencies to manage CO training and career development and to monitor acquisition workforce certification requirements.[1] Each civilian agency must collect and maintain standardized information to ensure effective management of the acquisition workforce. The purpose of FAITAS is to reduce duplication of workforce management systems and leverage training resources across agencies.

The FAI is also required by the Office of Management and Budget (OMB) to conduct periodic agency audits to validate whether the standards for certification are being met.[2] The certification process, including verification and assessment of applications, is managed by each agency. OMB memorandum, *Increasing Efficiencies in the Training, Development, and Management in the Acquisition Workforce* (September 3, 2013), states that as of January 1, 2014, each civilian agency should have accurate and complete records in FAITAS for all designated acquisition officials. This memorandum further requires all

civilian agencies to register their acquisition workforce for agency-provided acquisition training by October 1, 2014.

The FAC-C program established core requirements for education, training, experience, and continuous learning for COs in Federal civilian agencies. The FAC-C program is governed by an OMB memorandum, *The Federal Acquisition Certification in Contracting Program*, (revised May 7, 2014). The FAC-C Level III certification has similar requirements to the GSA senior/unlimited warrant requirements, but also requires a core training curriculum, continuous learning points (CLPs), and at least 4 years of current contracting experience (within the last 10 years). Effective October 1, 2007, Level III certified contracting officers must complete at least 80 hours of CLPs every two years.[3] If the required 80 hours of CLPs are not completed, the FAC-C certification expires and the appropriate warranting authority may modify or revoke the warrant. Holding a FAC-C is a function of maintaining the required CLPs. Agencies and individuals are responsible for maintaining and supporting certification documentation for quality assurance purposes.

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1. The Office of Federal Procurement Policy issued a memorandum on September 3, 2013, *Increasing Efficiencies in the Training, Development, and Management of the Acquisition Workforce*, that tasked FAI with acquisition workforce initiatives.
2. Audit checks may include:
   • Verifying that the agency maintains FAC-C applications;
   • Auditing an individual's records for documentation that they attended the training reported on the FAC-C application;
   • Verifying that a rigorous fulfillment process is being followed by the agency and that this process is aligned with the Department of Defense (DoD) DAWIA fulfillment process; and
   • After January 1, 2007, verifying that new warrant holders are appropriately certified in accordance with agency-specific policy.
3. Office of Management and Budget memorandum issued on January 20, 2006, *The Federal Acquisition Certification in Contracting Programs*.

1 Federal Acquisition Institute Tracking Application System (FAITAS) Control Weakness

Our evaluation found a weakness in the FAITAS system that permits acquisition professionals to improperly select and designate their approving supervisor from those registered within the system, regardless of whether the CO actually works for the designated supervisor or works in the same agency as the supervisor.

GSA has 40 bureaus, each assigned a Bureau Career Manager (BCM). The BCM has oversight responsibility for reviewing certifications, training, and CLPs for those COs within their assigned bureau. The BCM is able to generate and review reports within FAITAS to ensure that a CO's FAC-C certification data is current and accurate. This monitoring control is compromised when the CO has the discretion to select a supervisor that is not in the CO's bureau.

Our review identified one of the six COs interviewed had selected a supervisor in FAITAS, a former GSA employee currently working at the Department of Housing and Urban Development Office of Inspector General (HUD OIG), to approve the CO's CLPs, training, and requests for achievement status. Because FAITAS is a database used by multiple federal civilian agencies' acquisition officials, the GSA CO could, and did, designate an outside approver.

If the current BCM oversight process were working, this matter should have been flagged by the Internal Acquisition Division's BCM or GSA's Acquisition Career Manager (ACM). However, it was not corrected until brought to the attention of the Director of Internal Acquisition Division during the evaluation.

2 Continuous Learning Point (CLP) Training Documentation Deficiencies

We found deficiencies in the recording and documenting of CLP training. In one instance there was no record of a CO's required training from January 2011 to January 2013 in either FAITAS or retained by the CO, although the CO had awarded contracts between November 2012 and January 2013.

In a second instance, a CO had reported completing 81 hours of CLPs in FAITAS for the August 13, 2011 to August 12, 2013 continuous learning period, which was approved by his/her supervisor on July 24, 2013. The CO subsequently admitted that 79 of the reported 81 CLPs had in fact been completed online by his/her spouse and not by the CO. In November 2013, the CO's warrant was suspended and the employee was transferred to a non-warranted position in another division within OAS on February 9, 2014. During the August 13, 2011 to November 2013 timeframe when the CO was not properly warranted, the CO had awarded five contract actions totaling over $13 million.

In a third instance, although a CO's CLP hours had been completed in August 2012, his/her warrant was not reinstated until nine months later on May 3, 2013. OAS management stated that this likely occurred due to the deployment of the FAITAS FAC-C and Continuous Learning modules during this timeframe causing a delay in the updating of completed training in FAITAS.

As such, FAITAS incorrectly indicated that the CO was not eligible to award contracts despite his/her CLP hours in fact being current.

We were advised that at the time these instances occurred GSA had not fully implemented the FAITAS Continuous Learning modules. As such, a CO during this time would need to submit his/her recertification package for someone else to manually enter the training into FAITAS, thereby causing delays between the CO's completed training and the FAC-C recertification. In late 2013, FAITAS was fully implemented and now allows a CO to directly enter his/her training into FAITAS. In turn, FAITAS will automatically recertify the CO's FAC-C once the required CLP hours are met or will notify the CO and his/her supervisor that the required 80 CLP hours for a 2-year period have not been met. We were also informed that the BCM and ACM now provide oversight of this process by ensuring that the 80 CLP hours are met and that proper credit is given. Additionally, the Internal Acquisition Division has since reportedly established a dedicated Acquisition Workforce Training branch in October 2014. Its purpose is to provide greater assurance that the required training is taken before a CO is given FAC-C certification.

OAS's recently established Acquisition Workforce Training Branch will remediate most of these concerns through direct monitoring of a CO's continuous learning and training requirements and periodic checks of a CO's warrant authority and FAC-C designations as well as verifying that data entered into the FAITAS system is current, accurate, and complete. However, the FAITAS weakness that permits acquisition professionals to improperly select and designate their approving supervisor necessitates a system fix. To enhance effective oversight of CO compliance with FAC-C program certification requirements, OAS may consider requesting an independent FAI audit of all OAS acquisition professionals to validate the standards for FAC-C certification are being met.

Recommendation 1: GSA should establish FAITAS system controls to ensure that contracting officers no longer have unlimited discretion in selecting a supervisor for approving their actions.

Recommendation 2: OAS should ensure that their contracting officers' training CLPs have been properly updated in FAITAS in order to maintain their FAC-C certifications without lapse.

We conducted interviews of six of the 11 OAS central office contracting officers holding an unlimited warrant and FAC-C III certification to verify their adherence to these programs' requirements. We did not interview the other five OAS contracting officers because they started working at GSA in 2010 or later which was outside the targeted time period of the evaluation. We verified the accuracy and completeness of the supporting documentation for the six contracting officer's warrant and FAC-C certifications for CLPs earned, core curriculum courses completed, and educational transcripts that were required to maintain their current acquisition designations. Specifically, we judgmentally sampled 162 training certificates from the 235 provided by the six contracting officers to verify the accuracy of the CLP hours reportedly earned, and to ensure the courses had in fact been completed by the contracting officers.

This evaluation was conducted in accordance with the *Quality Standards for Inspection and Evaluation*, issued by the Council of the Inspectors General on Integrity and Efficiency.

If you have any questions, please contact Scott Kamens, Deputy Director of the Office of Inspections and Forensic Auditing, at scott.kamens@gsaig.gov or 202-501-0163, or Patricia Sheehan, Director of the Office of Inspections and Forensic Auditing, at Patricia.Sheehan@gsaig.gov or 202-273-4989.

GSA

Office of Administrative Services

September 2, 2015

MEMORANDUM FOR   PATRICIA D. SHEEHAN
DIRECTOR
OFFICE OF INSPECTIONS AND FORENSIC AUDITING (JE)

FROM   CYNTHIA A. METZLER
HEAD OF CONTRACTING ACTIVITY
CHIEF ADMINISTRATION SERVICES OFFICER (H)

SUBJECT   Draft Report Limited Scope Evaluation – GSA Office of
Administrative Services Contracting Officer Warrants and FAC-C
Certifications

Thank you for the opportunity to provide additional comments to the Draft Audit Report JEF14-001-000 regarding the "Limited Scope Evaluation - GSA Office of Administrative Services Contracting Officer Warrants and FAC-C Certifications". We appreciate this evaluation and the opportunity to continue to work together to improve our operations.

I note that the subject of this limited scope evaluation is the Office of Administrative Services (OAS), but that the first finding and recommendation involves the Federal Acquisition Institute Tracking Application System (FAITAS) which is under the jurisdiction of the Office of Governmentwide Policy (OGP).

"Recommendation No.1 GSA should establish FAITAS system controls to ensure that contracting officers no longer have unlimited discretion in selecting a supervisor for approving their actions."

OAS will share this recommendation with the Associate Administrator of OGP and with the Senior Procurement Executive (SPE) who is located in OGP. OGP is the "system owner" for FAITAS and is responsible for maintaining FAITAS.

As to the second recommendation,

"Recommendation No. 2 OAS should ensure that their contracting officers' training CLP's have been properly updated in FAITAS in order to maintain their FAC-C certifications without lapse."

OAS has already taken steps to implement this recommendation.

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OAS looks forward to receiving the final audit report and to continue implementing ways to strengthen the process of recording and documenting CLP training for its acquisition professionals.

If you have any questions, please contact me or Ernesto Martinez, Director of the Internal Acquisition Division, at (703) 605-9223 or via e-mail at ernesto.martinez@gsa.gov.

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       Christine Harada
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