



DEPARTMENT OF VETERANS AFFAIRS
OFFICE OF INSPECTOR GENERAL

Office of Audits and Evaluations

DEPARTMENT OF VETERANS AFFAIRS

Contracting Officer
Warranting Program Meets
Federal Requirements but
Could Be Strengthened

REVIEW

REPORT #20-01910-244

SEPTEMBER 27, 2021



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Executive Summary

VA has one of the largest acquisition functions in the federal government, with its contracting officers obligating approximately \$36.9 billion in fiscal year (FY) 2020 alone. A warrant gives federal contracting officers the authority to obligate taxpayer dollars for procuring goods and services. Contracting officers must be qualified by “experience, training, education, business acumen, judgment, character, and reputation.”¹ VA’s contracting officers help serve our nation’s veterans by procuring the goods and services required for their care and support.

There have been long-standing concerns with the contracting officer warrant program. Since 2015, the VA Office of Inspector General (OIG) has issued multiple reports in which warranted contracting officers exceeded their authority or made decisions that put veterans and VA facilities, resources, and information systems at risk.² In addition, VA’s acquisition management has been included on the Government Accountability Office’s (GAO) high-risk list.³ The OIG conducted this review to determine whether VA had an effective contracting officer warrant program.

What the Review Found

The OIG found that VA’s contracting officer warrant program complied with the Federal Acquisition Regulation (FAR) requirements. However, VA could leverage promising practices in its own offices and other federal agencies to strengthen the program. The review team’s work revealed that VA lacked assurance that all warrants issued to contracting officers were justified and necessary. Also, VA does not have sufficient data to effectively staff and distribute contracting officers’ workload. The OIG also found that additional guidance would be useful in determining when and how to reinstate warrants to individuals with past performance issues. Improved consistency in other areas such as warrant board procedures, officer selection, and warrant transferability would also strengthen the program.

¹ VA, Procurement Policy Memorandum 2020-01, “Contracting Officer Warrant Program,” October 1, 2019; FAR 1.603-2.

² Appendix A provides a summary of prior OIG reports.

³ GAO, *High-Risk Series: Substantial Efforts Needed to Achieve Greater Progress on High-Risk Areas*, GAO-19-157SP, March 2019. The high-risk list identifies government operations with greater vulnerabilities to fraud, waste, abuse, mismanagement, or that are in need of transformation to address economy, efficiency, or effectiveness challenges.

Opportunities Exist to Strengthen VA's Warranting Program

Although VA's warrant program complies with the FAR requirements, the review team identified several opportunities for VA to strengthen its warrant program by

- thoroughly justifying warrants,
- monitoring contracting officer workload,
- establishing procedures for reissuing or reinstating warrants that were rescinded due to contracting officers' performance issues, and
- applying warrant program procedures consistently.

The Office of Acquisition and Logistics' (OAL) executive director is responsible for VA's warrant program.⁴ The executive director has the authority to delegate some of those responsibilities to other VA officials.⁵ VA has 10 heads of contract activities (HCAs) who are the officials charged with managing the procurement program for their assigned offices. In April 2020, OAL's executive director published Procurement Policy Memorandum 2020-01 to officially delegate warranting authority to each HCA official.⁶ The director delegated the authority to issue and terminate warrants to HCAs because of the greater visibility and knowledge those officials have of their specific offices' warranting needs.

According to the executive director, the memorandum delegating authority was not as comprehensive as she wanted. Her initial focus was to delegate authority to the HCAs in accordance with the FAR and establish a baseline. She then planned to establish a working group to further develop and standardize internal policies and procedures for VA. The review team recognizes the executive director's efforts to improve the warrant program and presents this report's findings to help inform her office's additional enhancement efforts. For example, the OIG found that VA's current warrant justifications lack specificity. Without detailed information, such as requiring the officials to explain the impact on the organization if the warrant is denied, VA cannot ensure that all warrants are necessary.

In addition, the memorandum does not specifically address monitoring contracting officers' use of their warrants. By monitoring usage, VA could identify when warrants are no longer needed and address workload challenges by distributing workload more effectively. The executive director informed the review team that she is considering establishing a VA-wide requirement for monitoring contracting officer workload that is consistent with the OIG's recommendation.

⁴ FAR 1.603-1; VA Acquisition Regulation 801.601; VA Acquisition Regulation 801.690-6. VA's senior procurement executive is the executive director of the Office of Acquisition and Logistics.

⁵ VA Acquisition Regulation 801-690-6.

⁶ VA, "Contracting Officer Warrant Program."

The resulting data could help managers make more informed strategic decisions for adjusting the number of warrants to achieve an effective and efficient distribution of the workload.

Although the FAR does not require a formalized reinstatement process for individuals who had their warrants rescinded due to performance issues, VA could mitigate the risk of fraud, waste, and abuse by publishing guidance to address this.

Finally, although the memorandum requires each HCA to establish a contracting officer warrant board and associated procedures, the OIG found implementation inconsistencies across the VA enterprise.⁷ The executive director of OAL has already taken steps to standardize VA's warrant program.

While VA's warrant program meets federal requirements, additional steps can be taken to help address the issues identified by GAO and provide VA leaders with greater assurances that taxpayer dollars are being effectively spent using consistent processes and adequate controls.

What the OIG Recommended

The OIG made three recommendations to the OAL executive director to strengthen VA's warrant program. The recommendations included assessing the warrant justification template and determining whether additional information should be required. In addition, the executive director should determine whether formalized procedures to monitor contracting officer workload should be implemented and required throughout VA. Finally, the OIG recommended identifying updates to the warrant program policy that would promote consistency of standards and practices across VA.

⁷ A warrant board evaluates contracting officers' warrant application packages and recommends issuance of warrants to the HCA.

Management Comments

The principal executive director of the Office of Acquisition, Logistics, and Construction and chief acquisition officer concurred with the finding and all three recommendations. Appendix C provides the full text of the principal executive director's comments.

OIG Response

The principal executive director's planned corrective actions are responsive to all the recommendations and address the issues identified in the report. The OIG will monitor implementation of the recommendations until all proposed actions are complete.

A handwritten signature in dark ink, reading "Larry M. Reinkemeyer". The signature is written in a cursive, flowing style.

LARRY M. REINKEMEYER
Assistant Inspector General
for Audits and Evaluations

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Abbreviations

FAR	Federal Acquisition Regulation
FY	fiscal year
GAO	Government Accountability Office
HCA	head of contracting activity
OAL	Office of Acquisition and Logistics
OIG	Office of Inspector General
RPO	Regional Procurement Office
VHA	Veterans Health Administration



Introduction

VA has one of the largest acquisition functions in the federal government, with contracting officers obligating approximately \$36.9 billion of taxpayer dollars in fiscal year (FY) 2020.⁸ Heads of contract activities (HCAs) are individuals across VA with the authority to issue contracting officer warrants to responsible personnel.⁹ VA has 10 HCAs. An HCA is a senior-level position responsible for managing the procurement program at an assigned office.¹⁰ Officials who hold these positions should have the education, training, and experience necessary to make the decisions required of an HCA.¹¹ A warrant gives contracting officers the distinct authority within the federal government to obligate taxpayer dollars for the procurement of goods and services. VA is responsible for ensuring personnel issued a warrant are qualified by “experience, training, education, business acumen, judgment, character, and reputation.”¹² Figure 1 shows a blank warrant. The VA Office of Inspector General (OIG) conducted this review to determine whether VA had an effective contracting officer warrant program.

Certificate of Appointment

Under authority vested in the undersigned and in conformance with Subpart 1.6 of the Federal Acquisition Regulation

is appointed

Contracting Officer

for the

United States of America

Subject to the limitations contained in the Federal Acquisition Regulation and to the following:

Unless sooner terminated, this appointment is effective as long as the appointee is assigned to:

(Organization)

(Agency/Department)

(Signature and Title)

(Date)

(Number)

STANDARD FORM 1402 (10-83)
Prescribed by GSA - FPMR (41 CFR) 101-11.6

Figure 1. Certificate of appointment.
Source: General Services Administration.

⁸ “Contract Data Reports,” General Services Administration, accessed February 23, 2021, <https://beta.sam.gov/reports/awards/standard>. In FY 2020, VA ranked third for obligating the most taxpayer dollars and ranked second in awarding the most contract actions in the federal government.

⁹ VA Acquisition Regulation 801-690-6; Federal Acquisition Regulation (FAR) 1.602-1. A contracting officer has the authority to enter into, administer, and/or terminate contracts and make related determinations and findings. Contracting officers may bind the government only to the extent of the authority delegated to them. FAR 1.602-2. Contracting officers are responsible for ensuring performance of all necessary actions for effective contracting, ensuring compliance with the terms of the contract, and safeguarding the interests of the United States in its contractual relationships.

¹⁰ VA Acquisition Regulation 801-695-1; VA Acquisition Regulation 801-695-3.

¹¹ VA Acquisition Regulation 801-695.

¹² VA, Procurement Policy Memorandum 2020-01, “Contracting Officer Warrant Program,” October 1, 2019; FAR 1.603-2.

Previously Identified Concerns with VA Acquisition Management

The Government Accountability Office (GAO) noted significant challenges for VA's acquisition management. In 2019, VA's acquisition management was added to GAO's high-risk list, stating that "VA must demonstrate greater leadership commitment and strategic planning to ensure efficient use of its acquisition funding and staffing resources."¹³ GAO's high-risk list provides focused attention on government operations with greater vulnerabilities to fraud, waste, abuse, mismanagement, or that are in need of transformation to address economy, efficiency, or effectiveness challenges. GAO identified several challenges facing VA, including contracting officer workload.

The OIG has also found that VA contracting officers failed to adequately protect taxpayer dollars. For example, the OIG identified that VA contracting officers regularly exceeded their authority by not ensuring they received the proper approval to award sole-source contracts. These actions resulted in approximately \$22 million in questioned costs.¹⁴ The OIG also reported that, prior to entering into a lease of equipment for \$9 million, a VA contracting officer did not perform the required analysis to determine the best value for the government. This occurred because the contracting officer misinterpreted guidance.¹⁵

VA's Warrant Program

The Federal Acquisition Regulation (FAR) requires agency heads to establish and maintain a procurement management program and a system for the selection, appointment, and termination of contracting officers.¹⁶ The VA Acquisition Regulation establishes that the senior procurement executive is responsible for VA's program.¹⁷ The senior procurement executive has the authority, however, to delegate this responsibility to other VA officials.¹⁸

¹³ GAO, *High-Risk Series: Substantial Efforts Needed to Achieve Greater Progress on High-Risk Areas*, GAO-19-157SP, March 2019.

¹⁴ VA OIG, *Problems Were Identified on One Regional Procurement Office Central Ambulance Service Contract*, Report No. 18-018-36-183, September 12, 2019; VA OIG, *Sole-Source Service Contracting at Regional Procurement Office East Needs Improvement*, Report No. 18-01836-185, September 17, 2019; VA OIG, *Sole-Source Service Contracting at Regional Procurement Office West Needs Improvement*, Report No. 18-01836-184, September 17, 2019.

¹⁵ VA OIG, *Review of Alleged Inappropriate Contract Actions Related to VA Lease of Digital Imaging Network—Picture Archival Communication System*, Report No. 15-04351-188, June 7, 2017.

¹⁶ FAR 1.603-1.

¹⁷ VA Acquisition Regulation 801.602; VA Acquisition Regulation 801.690-6. VA's senior procurement executive is the executive director of the Office of Acquisition and Logistics.

¹⁸ VA Acquisition Regulation 801-690-6.

On April 21, 2020, the senior procurement executive issued Procurement Policy Memorandum 2020-01 to replace a previous memorandum.¹⁹ The revised memorandum addressed VA's contracting officer warrant program and had an effective date of October 1, 2019.²⁰ This memorandum formally delegated the authority to issue and terminate contracting officer warrants to each HCA.²¹ The policy also

- clarified roles and responsibilities for warrant management,
- required HCAs to document procedures for requesting and terminating warrants, and
- required each HCA to establish a contracting officer warrant board and procedures for conducting those boards.

According to the memorandum, there are several steps involved in contracting officer warranting. The HCA appoints the warrant board members and chair. The board evaluates contracting officers' warrant application packages and recommends to the HCA when the board believes issuance of warrants is appropriate. The warrant application package details a candidate's experience, training, and education. Before contracting officers may be considered for a warrant, they must have obtained required levels of experience and training. Table 1 summarizes VA's warrant expenditure levels and the associated experience requirements. The HCA approves or disapproves the request after reviewing and considering the warrant application package and the board's recommendation.

Table 1. Warrant Thresholds

Warrant level	Expenditure level	Minimum contracting experience (in years)
Level I limited	<= simplified acquisition threshold*	1
Level II limited	<\$10,000,000	2
Level III limited	<\$500,000,000	4
Level III unlimited	No dollar limitation	6

Source: VA Procurement Policy Memorandum 2020-01, Contracting Officer Warrant Program, Attachment B, October 1, 2019.

**The simplified acquisition threshold is \$250,000.*

¹⁹ VA, Procurement Policy Memorandum 2020-01; VA, Procurement Policy Memorandum 2018-01, "Procedures for Nominating Candidates and Obtaining a Contracting Officer's Warrant," May 10, 2018.

²⁰ VA, Procurement Policy Memorandum 2020-01. According to senior officials in the senior procurement executive's office, the authority to issue and terminate contracting officer warrants was officially delegated to HCAs effective October 1, 2019. However, the official procurement policy memorandum delegating the authority was issued April 21, 2020.

²¹ VA, Procurement Policy Memorandum 2020-01.

Warrants Issuance

Figure 2 summarizes VA's warrant issuance process.

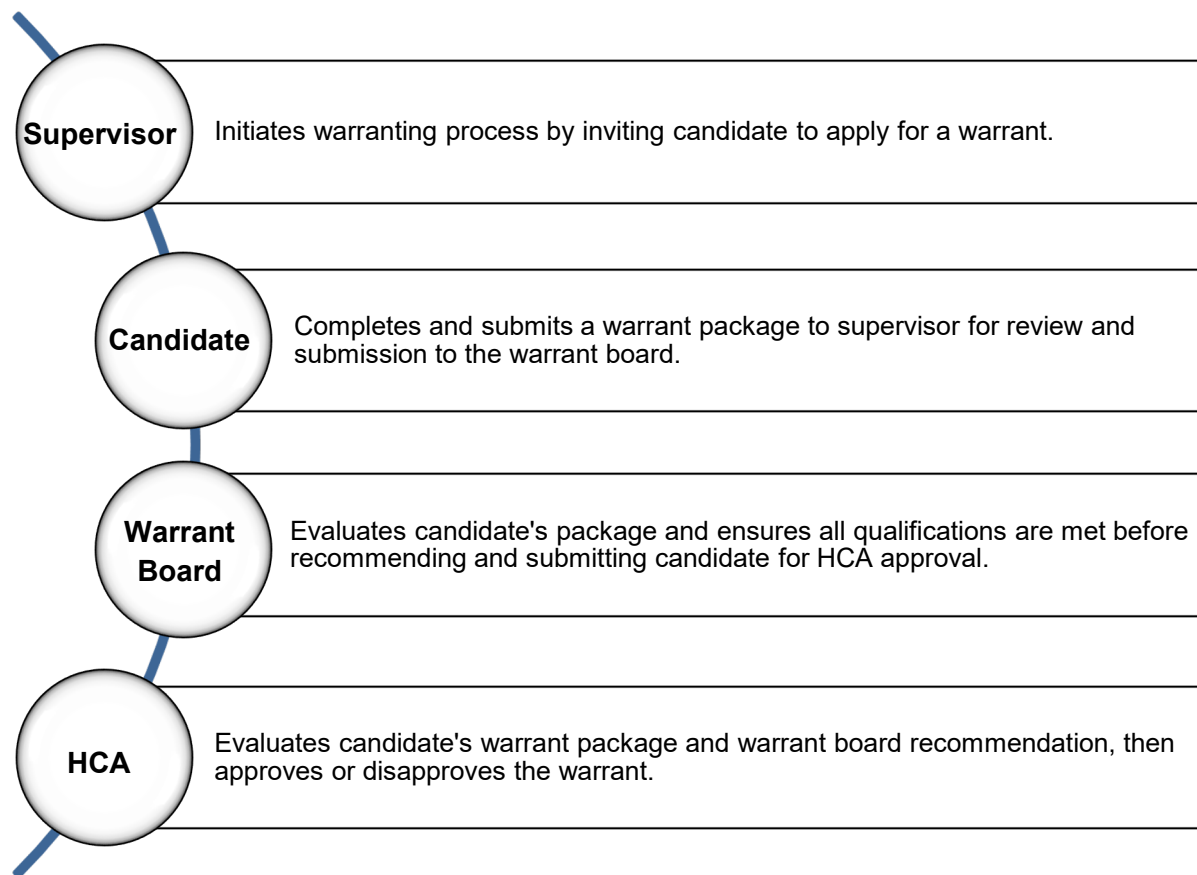


Figure 2. Summary of VA's warrant issuance process.

Source: VA OIG analysis of VA's warrant certification process.

Number of Warrants from 2012 through 2020

In January 2012, VA had 3,151 active warrants. Of these, 1,143 warrants were for contracting personnel and 2,008 were for non-contracting personnel. Non-contracting personnel were issued warrants to allow them to execute contracts and pay for goods or services outside of formal contract payment processes and to order items through existing contracts.

In September 2013, VA began eliminating non-contracting personnel warrants.²² This change was made to ensure all personnel had the required certification, training, and experience prior to being issued a warrant. VA was unable to provide the review team with data for the number of active warrants from 2013 to October 2017. Based on the team's analysis of available data, it

²² VA, Memorandum, "Expiration of VHA Non-1102 Level 1 Warrants," September 19, 2013.

determined the number of active warrants has remained relatively stable since 2017, averaging 1,773 active warrants from November 2017 to November 2020. Figure 3 shows VA's active warrants from January 2012 through November 2020.

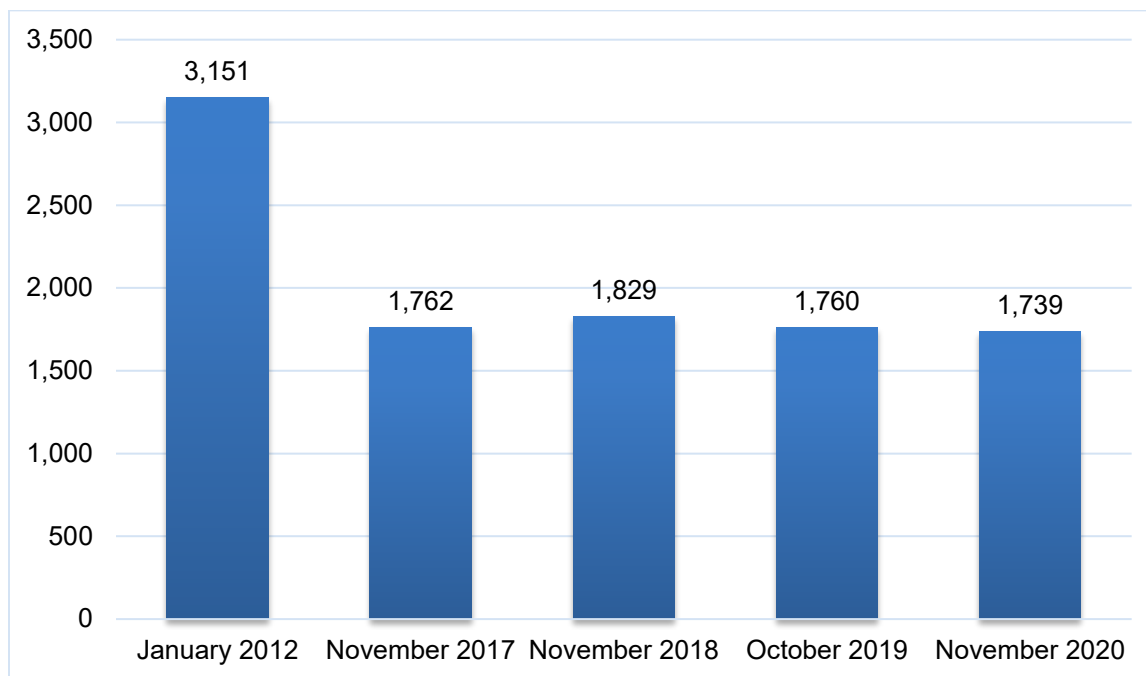


Figure 3. Number of active warrants from January 2012 through November 2020.
Source: VA OIG analysis of VA reports.

Office of Acquisition and Logistics

VA's Office of Acquisition and Logistics (OAL) is responsible for

- developing VA-wide acquisition regulations and policy,
- assessing compliance with procurement policy,
- overseeing procurement internal control and risk management functions,
- overseeing the professional development of the VA acquisition workforce, and
- maintaining the electronic contract management system.²³

²³ Office of Acquisition, Logistics and Construction, accessed April 3, 2020, <https://www.va.gov/oalc/organization.asp>.

VA HCA Activity

As mentioned earlier, HCAs oversaw VA contracting officers who obligated approximately \$36.9 billion of taxpayers' funds in FY 2020. Table 2 shows the amount of money obligated by warranted contracting offices and the number of warrants for each office.

Table 2. VA Procurement Breakout

VA office	Area of responsibility	Active warrants	Approximate amount (billions)
Veterans Health Administration (VHA) Regional Procurement Office (RPO) Central	Supplies and services to support the medical facilities within its region	458	\$9.1
VHA RPO East	Supplies and services to support the medical facilities within its region	574	\$4.6
VHA RPO West	Supplies and services to support the medical facilities within its region	250	\$3.1
Strategic Acquisition Center	Professional service contracts	64	\$12.2
Technology Acquisition Center	Information technology	35	\$6.0
National Acquisition Center	High-tech medical equipment, pharmaceuticals, and federal supply schedules for medical and surgical equipment	145	\$1.1
Other*	Varies by office	213	\$0.8
Totals		1,739	\$36.9

Sources: VA OIG analysis of VA websites, General Service Administration information, and the Federal Acquisition Institute Training Application System as of November 30, 2020.²⁴

** Other includes the Veterans Benefits Administration, the National Cemetery Administration, the Construction and Facilities Management, and the OIG.*

For FY 2020, the three RPOs and the three acquisition centers were responsible for about 98 percent of VA's funds. As of November 30, 2020, these six HCA offices were also responsible for about 88 percent of the VA's 1,739 warranted contracting officers. As the HCAs

²⁴ "About the Strategic Acquisition Center (SAC)," VA Office of Procurement, Acquisition and Logistics (OPAL), accessed April 2, 2020, <https://www.va.gov/opal/about/sac.asp>; "About the Technology Acquisition Center (TAC)," VA OPAL, accessed April 2, 2020, <https://www.va.gov/opal/about/tac.asp>; "About the National Acquisition Center (NAC)," VA OPAL, accessed April 2, 2020, <https://www.va.gov/opal/about/nac.asp>; "Contract Data Reports."

for the Veterans Benefits Administration, the National Cemetery Administration, the Construction and Facilities Management, and the OIG only represented about 2 percent of VA's FY 2020 funds, the review team did not examine them.

Results and Recommendations

Finding: VA's Warrant Program Complies with FAR Requirements but Could Be Strengthened

VA's contracting officer warrant program complies with FAR requirements to establish and maintain a system for the selection, appointment, and termination of appointment of contracting officers. However, opportunities exist for VA to strengthen the program by

- requiring a thorough justification detailing the specific need for each issued warrant within VA, as required by some other federal agencies;
- monitoring contracting officers' activity to ensure warrants are required and being used;
- providing guidance as to when HCAs should reissue warrants to individuals who have had their warrants suspended or terminated for performance issues; and
- applying warrant procedures consistently across HCAs.

According to the executive director of OAL, she identified the need to delegate the authority to issue warrants to the HCAs and standardize the warranting process and did so by issuing the memorandum in April 2020.²⁵ Her initial focus was to delegate authority to the HCAs in accordance with the FAR and establish a baseline warranting process. She also established an OAL policy group that is reviewing other federal agencies' approaches to help develop VA's internal policies and procedures.

While VA's warrant program meets federal requirements, it might not fully mitigate the risks associated with contracting officer warrants. Lack of sufficient controls for managing warrants increases the risk that procurements do not comply with federal or VA regulations. Further, if VA does not provide thorough warrant justifications, it will not have assurance that all warrants are necessary. Until monitoring of contracting officer warrant usage is required, VA may not have the visibility needed to address the workload challenges identified by GAO in the 2019 high-risk list report.

What the OIG Did

The review team examined federal and VA regulations and policies related to contracting officer selection, appointment, and termination. The team also reviewed the HCAs' execution of those requirements to ensure compliance and determine whether procedures were similar among the offices. The team conducted interviews with VA officials to obtain an understanding of each office's execution of the warranting process. Lastly, the team reviewed the warranting policies

²⁵ VA, Procurement Policy Memorandum 2020-01.

for the Department of the Air Force, Department of Energy, and Defense Health Agency to benchmark VA policies and procedures. Appendix B provides information on the review scope and methodology.

VA's Warrant Program Meets FAR Requirements

VA's warrant program complies with the requirements established in the FAR (as stated below) for each agency to establish and maintain a system for the selection, appointment, and termination of appointment of contracting officers:²⁶

- During contracting officer selection, officials will consider the complexity and dollar value of the acquisitions and the candidate's experience, training, education, business acumen, judgment, character, and reputation.²⁷
- Contracting officers shall be appointed in writing, which shall state any limitations on the scope of authority.²⁸
- Termination of a contracting officer appointment will be by letter. Terminations may be for reasons such as reassignment, termination of employment, or unsatisfactory performance.²⁹

VA updated its warrant program through the issuance of VA Procurement Policy Memorandum 2020-01, which delegated the authority to issue and terminate contracting officer warrants to HCAs. Prior to this memorandum, the authority to issue and terminate contracting officer warrants rested with VA's senior procurement executive and their deputy. In addressing VA's warrant program, the executive director of OAL and other leaders must ensure compliance with the FAR while also striking a balance between the need for uniformity and the need for enough flexibility by the HCAs to account for unique circumstances they may face. The updated memorandum also delegated responsibilities to HCAs to establish contracting officer warrant boards, evaluate contracting officer candidates' warrant application packages, and appoint contracting officers in writing.³⁰ As the memorandum addressed the selection, appointment, and termination of appointment of contracting officers, VA's warrant program complies with the minimum requirements established in the FAR.

²⁶ FAR 1.603-1.

²⁷ FAR 1.603-2.

²⁸ FAR 1.603-3.

²⁹ FAR 1.603-4. Termination of contracting officer appointment will be by letter unless the certificate of appointment contains other provisions for automatic termination.

³⁰ VA, Procurement Policy Memorandum 2020-01; FAR 1.603-2. The warrant application package includes the required selection criteria in the FAR.

Opportunities Exist to Strengthen VA's Warranting Program

Although VA's warrant program complies with FAR requirements, based on a comparison to other federal agencies and best practices within VA, the review team identified opportunities for VA to strengthen its warranting program. VA should consider the following:

- Adding more specificity to the warrant justification that describes the need for the warrant
- Implementing a VA-wide tool, such as the one developed by RPO East, for monitoring contracting officer workload
- Adding more detailed guidance and controls for reinstating warrants to individuals who had their warrants rescinded due to performance issues
- Improving consistency for how warrant boards conduct their activities, to include defining experience requirements, selecting warrant officers, and authorizing warrant transferability

After identifying these opportunities, the review team met with the executive director of OAL. She acknowledged that improvements to the warrant program could be made and steps were already being taken to strengthen and standardize VA's warrant program. The executive director explained the current policy was not as comprehensive as desired because the initial focus was to delegate the authority to issue and terminate contracting officer warrants to the HCAs in accordance with the FAR.

VA's Warrant Justifications Lack Specificity

HCAs use a contracting officer nomination memorandum when requesting a contracting officer warrant. This memorandum includes a template for justification language:

*I have nominated the candidate named below based on the complexity and dollar value of the acquisition(s) currently assigned or to be assigned, as well as the nominee's experience, training, education, business acumen, judgment, character, and reputation, and certify the warrant dollar threshold requested is limited to the amount the candidate requires to perform their assigned duties.*³¹

The FAR requires that officials consider the complexity and dollar value of the acquisitions and the candidate's experience, training, education, business acumen, judgment, character, and

³¹ VA, Procurement Policy Memorandum 2020-01.

reputation.³² Although the statement technically complies with the FAR, it does not actually provide specific details justifying VA's need for the warrant.

The review team examined 31 warrant justifications used by six HCAs. As seen in table 3, 14 of 31 justifications relied solely on the templated statement to justify the agency's need for the warrants.

Table 3. HCA Warrant Justifications without Additional Information

HCA	Total number reviewed	Number with only templated statement
VHA RPO Central	5	4
VHA RPO East	5	5
VHA RPO West	5	5
Strategic Acquisition Center	5	0
Technology Acquisition Center	6	0
National Acquisition Center	5	0

Source: VA OIG analysis of VA Memorandum, Request for Contracting Officer Appointment.

The remaining 17 warrant justifications included varying amounts of details, including

- the specific area of work related to the newly issued warrant,
- a dollar range of contracts the contracting officer would be responsible for,
- brief work experience descriptions of candidates, and
- brief job descriptions.

For example, a justification for a level III, \$50-million warrant for a Strategic Acquisition Center official explained that the warrant was necessary due to a workload increase in a specific directorate that had experienced a number of recent personnel transfers. By including this information, the agency clearly provided a basis for the need for the requested warrant. Requiring this type of additional detail in a warrant justification would provide specific information regarding the warrant's purpose and the effect on the organization if the warrant were not issued. In addition, requiring managers to provide a more robust and detailed justification could prevent or deter HCAs from issuing unnecessary warrants.

³² FAR 1.603-2.

Other federal agencies require specific information to more fully explain the agency's need for a warrant. For example, the nominating officials at the Department of the Air Force and the Defense Health Agency typically include information such as

- program or workload to be covered by the appointment of the contracting officer warrant;
- number of warrants assigned to the area the contracting officer will work;
- whether the requested warrant is required due to expanded workload, to include any future projects that are a priority for the organization;
- whether the requested warrant replaces another contracting officer warrant; and
- impact on the organization if the warrant is denied.

Even though there are no federal requirements that agencies justify a contracting officer's warrant in detail, some other federal agencies have implemented this additional internal control within their justification documents. VA could take similar action to strengthen its controls and ensure all issued warrants are necessary.

VA Could Strengthen Monitoring Requirements

As previously mentioned, GAO's 2019 high-risk list initially identified VA contracting officers' workload as an area of concern.³³ Two years later, GAO determined workload challenges were still an issue.³⁴ Although monitoring contracting officer warrant usage is not a requirement in the FAR or VA policies, it could help VA address the workload challenges by generating the data needed for more effective workload distribution. Until VA begins monitoring contracting officer workload, it may not be positioned to allocate its resources to effectively and efficiently meet its mission to procure goods and services for veterans.

In FY 2020, RPO East's HCA implemented a system to monitor contracting officer workload. The system was designed to aid in oversight of the warrant program by defining requirements that trigger a review of contracting officer warrants. Using the tool, managers review any contracting officers who award fewer than 10 actions in a year and determine whether the warrant is still required.

The OAL executive director informed the review team that OAL is considering establishing a VA-wide requirement for monitoring contracting officer workload that could help VA address the challenges identified by GAO. This monitoring could potentially provide managers with the

³³ GAO, *High-Risk Series: Substantial Efforts Needed to Achieve Greater Progress on High-Risk Areas*.

³⁴ GAO, *High-Risk Series: Dedicated Leadership Needed to Address Limited Progress in Most High-Risk Areas*, GAO-21-119SP, March 2021.

data necessary to make strategic decisions to distribute workload more effectively and determine the appropriate number of warrants to accomplish VA's mission.

VA Lacks Specific Requirements for Reinstating Warrants Rescinded Due to Performance Issues

HCAAs may rescind warrants for numerous reasons, including contracting officer reassignment, performance issues, and termination from employment.³⁵ VA's procurement policy memorandum and individual HCAAs' warrant program procedures lacked specific guidance and controls for reinstating warrants to individuals who had their warrants rescinded because of performance issues. These performance matters included not following federal regulations or executing their duties as required—putting VA at risk. Therefore, although the FAR does not require a formalized reinstatement process, VA should consider publishing guidance for warrants rescinded for performance issues.

The review team found that instead of establishing specific reinstatement procedures in these cases, HCAAs followed their standard warrant request procedures. This standard process does not ensure consistency in

- the amount of time necessary to monitor performance between warrant rescission and reissuance,
- training required after rescission due to performance issues, and
- supervisory oversight of improved performance after retraining and reissuance.³⁶

According to the deputy executive director of the Office of Acquisition, Logistics, and Construction, contracting offices needed flexibility regarding the HCAAs' ability to reinstate warrants, not a "cookie cutter" requirement. While the review team recognizes the need for flexibility, VA should consider having a framework to promote consistency in the reinstatement process and ensure warrants are only reinstated for deserving candidates. For example, the Department of Defense established a contracting officer warrant program model to assist its HCAAs in developing and improving its warrant program. This model recommends that warrant programs address reinstatement requirements.³⁷

From July 9, 2013, through March 10, 2020, VA terminated 30 contracting officer warrants for performance issues that included (1) blatant disregard for adhering to regulations, policies, and

³⁵ FAR 1.603-4.

³⁶ When a contracting officer's warrant is rescinded, they may still perform contract specialist duties; however, they are unable to obligate government funds.

³⁷ Department of Defense, "Contracting Officer Warranting Program Model," February 2012.

procedures; (2) unsatisfactory performance; and (3) failure to maintain required certifications.³⁸ VA later reinstated six of these warrants. Examples 1 and 2 illustrate VA's case-by-case approach to reinstating warrants that can be inconsistent for contracting officers who experienced performance problems.

Example 1

VHA terminated a contracting officer's level II warrant on December 19, 2014, because he knowingly signed a contract that was well beyond his warrant limit. However, over a year and a half later, VHA reinstated a level III warrant. According to VHA officials, his warrant was reinstated due to the length of time between the termination and reissuance, the lesson learned, and his improved performance.

Example 2

VHA terminated a contracting officer's level II warrant on December 6, 2018, because of performance issues. However, after about eight months, VHA reinstated her level II warrant. According to VHA officials, the contracting officer developed a training plan in collaboration with her supervisor in an attempt to improve her performance and knowledge. In addition, she spent a significant amount of time doing on-the-job-training with her supervisor and studying at home. She also passed the contracting officer warrant board on her first attempt.

Although VA does not often reinstate warrants that were rescinded due to performance issues, it should consider the benefits of standardizing some procedures to help ensure fairness, consistency, and stringency.

Warranting Program Implementation Inconsistencies across VA

VA's procurement policy memorandum requires each HCA to establish a contracting officer warrant board and procedures for conducting the board's assessments of individuals applying for warrants. The review team found that the six HCAs reviewed complied with this requirement; however, the procedures varied.³⁹ VA could strengthen its warrant program by improving consistency with

- warrant boards,

³⁸ In May 2020, VA provided the team with an internal document recording terminations during this time period.

³⁹ During the course of this review, RPO East, RPO West, and the Technology Acquisition Center issued updated warranting procedures. Specifically, these updates incorporated language detailing certain officials' responsibilities. These updates did not affect the results of the review.

- experience requirements, and
- warrant transferability.

The team also found that the Technology Acquisition Center has a different organizational philosophy (described on page 18) regarding warranting contracting officers that VA may want to further explore with its other HCAs.

VA's Warrant Board Procedures

The HCAs' procedures for how warrant boards conduct their activities were inconsistent. For example, while the RPOs and the Technology Acquisition Center required interviews to recommend warrants be granted, the Strategic Acquisition Center and National Acquisition Center did not. Instead, the National Acquisition Center and Strategic Acquisition Center relied on a review of the candidate's submitted warrant package to make a determination whether to recommend approval. Table 4 provides an overview of the differences among the HCAs' warrant board requirements.

Table 4. Overview of Contract Warrant Board Procedures by HCA

Element	RPO Central	RPO East	RPO West	Strategic Acquisition Center	Technology Acquisition Center	National Acquisition Center
Is an interview required?	Yes	Yes	Yes	No	Yes	No
Are candidate question requirements established?	Yes	Yes	Yes	No	Yes	No
Are the number of questions a candidate must be asked established?	Yes	Yes	Yes	No	No	No
Is there a requirement for the number of correctly answered questions established?	Yes	Yes	Yes	No	No	No
Is there annual or ongoing validation that warrant is still needed?	Yes	Yes	No	Yes	No	No

Source: VA OIG analysis of HCA warrant guides.

Although some HCAs had the same category of warrant board requirements, the review team found differences in implementation. For example, the RPOs and the Technology Acquisition Center required questions be answered during the warrant board process. While each RPO required formatted interview questions for each warrant level, the number of questions varied. Unlike the RPOs, the Technology Acquisition Center did not establish a specific number of questions to be asked at any level. It only required “multiple technical questions” be asked to assess contracting knowledge and ability to research, understand, and apply the FAR. These inconsistencies could result in different standards being applied across VA for issuing contracting officer warrants.

Experience Requirements and Selection

As previously discussed, VA established experience requirements for each warrant level. The review team found HCAs implemented experience requirements that complied with VA requirements. However, RPO West required additional years of experience and further defined level III by dollar range. Table 5 shows the difference between the procurement policy memorandum and RPO West requirements.

Table 5. Years of Experience Required by VA’s Procurement Policy Memorandum and RPO West

Warrant level	Procurement policy memorandum	RPO West
Level I	1 year	2 years
Level II	2 years	3 years
Level III	4 years	Up to \$50 million: 4 years Up to \$500 million: 5 years
Level III unlimited	6 years	Not applicable*

Source: VA Procurement Policy Memorandum 2020-01, Contracting Officer Warrant Program, Attachment B, October 1, 2019; and RPO West’s warrant guide.⁴⁰

Note: All timeframes are the minimum experience required to obtain the specified warrant level.

** RPO West does not address an internal standard for unlimited warrants as its office does not issue unlimited warrants.*

During an interview, the RPO West regional training officer explained it uses a more cautious approach to issuing warrants. The HCA added that he believed an additional year was needed to ensure each candidate had more experience.

⁴⁰ VHA, “RPO West Operations Manual Part 201: Warrants Guide—Board Procedures,” April 2020.

Warrant Transferability

According to VA's procurement policy memorandum, the transfer of contracting officer warrants requires close collaboration between the gaining and losing HCAs and other VA officials.⁴¹ The review team found HCAs have different established procedures regarding warrant transferability, as seen in table 6.

Table 6. Overview of Contracting Officer Warrant Transferability

VA office	Contracting officers who transfer within VA
RPO Central	<i>If from another RPO:</i> <ul style="list-style-type: none"> Retain their warrant and only need to meet with a board if seeking a higher warrant limit <i>If from a non-RPO HCA:</i> <ul style="list-style-type: none"> Not addressed
RPO East	<ul style="list-style-type: none"> Retain their warrant and only need to meet with a board if seeking a higher warrant limit
RPO West	<i>If from another RPO:</i> <ul style="list-style-type: none"> Retain their warrant and only need to meet with a board if seeking a higher warrant limit <i>If from a non-RPO HCA:</i> <ul style="list-style-type: none"> Not allowed to use the existing warrant until their qualifications are properly vetted against RPO West requirements
Strategic Acquisition Center	Not addressed
Technology Acquisition Center	Not addressed
National Acquisition Center	Prior warrant is rescinded and a new warrant must be issued

Source: VA OIG analysis of HCA warrant guides.

When benchmarking VA's transferability procedures against other federal agencies, the review team found the Department of the Air Force allows for warrant transferability across the entire agency. This transferability allows for easier and faster assignment of contracting officers to help address any workload inconsistencies or emergency contracting. As contracting officer workload is a challenge that contributed to VA being placed on GAO's high-risk list, officials should assess controls to promote the ability to transfer contracting officers across the enterprise quickly and efficiently.

⁴¹ Other VA officials include the directors for the Procurement Policy Services and the Acquisition Human Capital Management Services.

The Technology Acquisition Center's Organizational Philosophy

The review team found that the Technology Acquisition Center used a different philosophy for issuing warrants than the other HCAs reviewed. The Technology Acquisition Center is the only HCA that solely issues level III unlimited warrants to contracting officers, allowing them to sign contracts for any dollar amount. Further, the Technology Acquisition Center only confers warrants on individuals in supervisory positions. In the Technology Acquisition Center model, contract specialists prepare the required contract documentation and submit it to a supervisor (contracting officer) to review and award the contract. This organizational philosophy has resulted in fewer warrants at the Technology Acquisition Center when compared to the other HCAs. It is understood that HCAs need flexibility to meet their specific missions, and this philosophy may not be feasible for all offices. However, the review team identified this as an approach that VA may want to explore further.

Table 7 shows the number of active warrants as of November 2020 and the amount of money obligated for FY 2020 at each reviewed HCA office.

Table 7. Active Warrants and Amounts by HCA

	RPO Central	RPO East	RPO West	Strategic Acquisition Center	Technology Acquisition Center	National Acquisition Center
Active warrants	458	574	250	64	35	145
Approximate amount (billions)	\$9.1	\$4.6	\$3.1	\$12.2	\$6.0	\$1.1

Source: VA OIG analysis.

Warrant Program Standardization

In November 2018, VA appointed a new executive director of OAL. At that time, OAL issued all VA warrants. The executive director stated that HCAs have better visibility over and knowledge of the warranting needs of their individual offices. She informed the review team that she identified the need to delegate the authority to issue warrants to the HCAs and standardize the warranting process. As previously stated, the OAL's April 2020 Procurement Policy Memorandum 2020-01 officially delegated warranting authority to each HCA.

According to the executive director, although the initial policy was not as comprehensive as she wanted, she planned to establish a group to further develop and standardize internal policies and procedures for VA. As noted earlier, the effort to shape new guidance must strike a balance between the benefits of uniformity with the need to allow some flexibility to the HCAs to address unique circumstances. In fact, the executive director informed the review team that she does not want overly prescriptive guidance; rather, she wants to standardize approaches while

allowing HCAs the necessary flexibility to accomplish their missions. Any exceptions to the policy will be justified and documented to ensure visibility. Her initial focus was to delegate authority to the HCAs in accordance with the FAR and establish a baseline. The policy group is already reviewing other federal agencies' approaches to help develop VA's internal policies and procedures and is looking at some of the same areas the team identified.

VA Lacks a Formal and Documented Approach for Adjusting the Number of Warrants to Workload

There are no federal or VA regulations that require a single agencywide approach to determine the appropriate number of warrants for an agency. However, GAO's high-risk report identified contracting officer workload as one of VA's acquisition management challenges. As such, VA may want to consider formalizing an approach to ensure it has the appropriate number of warranted contracting officers to support workload demands.

One of the VA HCAs, the Technology Acquisition Center, has a plan that establishes several factors that senior leaders consider when determining the appropriate number of warrants, including current and projected organizational workload.⁴² In addition, due to its organizational philosophy, the Technology Acquisition Center only issues warrants to supervisors as part of the job requirements. Although the other HCAs did not document their approaches, an RPO senior leader asserted that

1. RPO senior leaders assessed each contracting office in regard to workload, mission requirements, and personnel needs to ensure enough contracting officer warrants were issued; and
2. a comprehensive warrant status report was sent to RPO senior leaders to facilitate discussions regarding the appropriate numbers and levels of warrants to meet mission requirements and balance workload effectively and efficiently.

In addition, staff from each HCA informed the review team that workload was one of the driving factors regarding the number of warrants necessary to accomplish the mission. One HCA official explained that determining the appropriate number of warranted contracting officers is an elusive goal, and it is difficult to create a one size-fits-all model because of the complexity of requirements and the changing priorities. For example, priority changes can occur to address

⁴² According to the Technology Acquisition Center's Contracting Officer Manpower Plan, "the appropriate number of contracting officers for the Technology Acquisition Center is determined by applying sound business judgment in the following factors: (1) Human Resource regulations and policy, (2) Current and projected workload of the organization, (3) The level of experience of the requiring activities involved in the procurements to be executed, (4) The experience, Federal Acquisition Certification in Contracting Certification level, and acquisition skills possessed by the individual contract specialist on each contracting officer's team, and (5) A data-driven methodology using a bi-annual analysis to make necessary warranted contracting officer staffing decisions."

pandemics, natural disasters, and other emergency situations to support VA's fourth mission to provide support in the community.⁴³ The review team acknowledges the need for flexibility and responsiveness to changing priorities, but that does not preclude a documented process that could provide VA with more information to right-size the program. Although there is no federal regulation requiring this, by formalizing an approach, VA could demonstrate leaders' commitment to continuous improvement and strategic planning to more efficiently use staffing resources to support workload demands. Progress in this area could assist VA in having this matter removed from GAO's high-risk list.

Conclusion

While VA's warrant program meets federal requirements, it can take additional steps to mitigate the risks associated with contracting officer warrants. As warranted contracting officers procure supplies and services using billions of taxpayer dollars, any lack of controls for managing warrants increases the risk that procurements may not comply with federal or VA regulations. The OIG has reported several instances of VA contracting officers failing to adequately protect taxpayer dollars, which has resulted in at least \$3.9 billion dollars of questioned costs and funds that could have been put to better use.⁴⁴ Further, if VA does not address the issues identified in this report, such as more specific warrant justifications, it will lack assurance of their necessity. In addition, until VA requires monitoring of contracting officer warrant usage, VA may not have the visibility required to address the workload challenges identified in GAO's high-risk list report.

Recommendations

The OIG made three recommendations to the executive director of the Office of Acquisition and Logistics:

1. Assess the warrant justification template and determine whether additional information and guidance should be required.
2. Determine whether any additional formalized procedures to monitor contracting officer workload should be implemented and required throughout VA.
3. Identify updates to warrant program policies that can increase the consistency of standards and practices across VA to promote fairness and stringency of warrant requirements.

⁴³ "About VA," U.S. Department of Veterans Affairs, accessed April 2, 2020, https://www.va.gov/about_va/. VA's "Fourth Mission" is to improve the nation's preparedness for response to war, terrorism, national emergencies, and natural disasters by developing plans and taking actions to ensure continued service to veterans, as well as to support national, state, and local emergency management, public health, safety, and homeland security efforts.

⁴⁴ This total is based on data in prior OIG reports from FY 2015 to FY 2019. Appendix A provides additional information on these reports.

Management Comments

The principal executive director of the Office of Acquisition, Logistics, and Construction and chief acquisition officer concurred with the finding and all three recommendations. For recommendation 1, the principal executive director stated the Office of Acquisition, Logistics, and Construction is currently reviewing the template with key stakeholders and will determine if additional information and guidance is required. For recommendations 2 and 3, the principal executive director stated the office has initiated discussions with the heads of contract activities across the department. The Office of Acquisition, Logistics, and Construction will make determinations as to whether updates to the warrant justification template and warrant program procedures and policies are needed by December 31, 2021. The full text of the responses from the principal executive director is in appendix C.

OIG Response

The OIG determined the principal executive director's planned corrective actions are responsive to the recommendations and address the issues identified in the report. The OIG will monitor implementation of the recommendations until all proposed actions are completed.

Appendix A: Prior OIG Reports

Prior OIG reports identified better use of funds and questioned costs in which warranted contracting officers exceeded their authority or made decisions that put veterans and VA facilities, resources, and information systems at risk. Table A.1 provides an overview of the reports to include monetary impact.

Table A. 1. Overview of Prior OIG Reports

Date published	Title	Better use of funds (in dollars)	Questioned costs (in dollars)
November 19, 2014	Audit of VHA's Support Service Contracts	795,000,000*	0
April 28, 2015	Review of VA's Patient-Centered Community Care (PC3) Contracts' Estimated Cost Savings	0	0
November 12, 2015	Audit of Seismic Safety of VA's Facilities	0	0
August 18, 2016	Review of Alleged Mismanagement of the Ambulette Services at the New York Harbor Healthcare Systems	0	0
September 22, 2016	Review of VA's Award of the Patient-Centered Community Care (PC3) Contracts	16,800,000	0
February 1, 2017	Review of Alleged Improperly Sole-Sourced Ophthalmology Service Contracts at the Phoenix VA Health Care System	0	0
June 7, 2017	Review of Alleged Inappropriate Contract Actions Related to the Lease of a Digital Imaging Network-Picture Archival Communication System	0	0
June 27, 2017	Review of Alleged Mismanagement of the Patient Transportation Service Contract for the Jesse Brown VA Medical Center in Chicago, Illinois	0	0
September 29, 2017	Audit of Purchase Card Use To Procure Prosthetics	2,600,000,000*	520,700,000*
February 8, 2018	Review of Excessive Procurement Costs at the Rural Outreach Clinic, Laughlin, Nevada	290,009	0

Date published	Title	Better use of funds (in dollars)	Questioned costs (in dollars)
March 6, 2018	Audit of Interior Design and Furnishing Contract Mismanagement by the Network Contracting Office 21	0	3,300,000
June 13, 2019	VA'S Administration of the Transformation Twenty-One Total Technology Next Generation Contract	0	37,500,000*
September 12, 2019	Problems Were Identified on One Regional Procurement Office Central Ambulance Service Contract	0	2,227,493
September 17, 2019	Sole-Source Service Contracting at Regional Procurement Office East Needs Improvement	0	14,245,166
September 17, 2019	Sole-Source Service Contracting at Regional Procurement Office West Needs Improvement	0	6,034,026
February 27, 2020	Review of Regional Procurement Office East's Contract Closeout Compliance	6,840,219	0
Total (sum includes projected and estimated amounts)		3,418,930,228	584,006,685

Source: OIG Reports, <https://www.va.gov/oig/apps/info/OversightReports.aspx>.

* Amount is projected or estimated.

Appendix B: Scope and Methodology

Scope

The review team conducted its work from April 2020 through July 2021. The review evaluated whether VA had an effective contracting officer warranting program. To review trends in the number of VA's active warrants, the team also reviewed data from January 2012 through November 2020.

Methodology

The review team identified and reviewed the FAR and VA policies related to contracting officer warrant programs. The team also examined VHA, National Acquisition Center, Strategic Acquisition Center, and Technology Acquisition Center warrant board procedures to ensure compliance with those requirements and determine whether procedures were similar among the HCAs.⁴⁵ The team interviewed VA officials to understand how policies and procedures were implemented and to learn more about what actions VA already has underway. In addition, the team reviewed the warrant policies and procedures for the Department of the Air Force, Department of Energy, and Defense Health Agency to compare to VA policies and procedures.

The review team evaluated HCAs' approaches for determining the appropriate number of contracting officer warrants by measuring them against other federal agencies. The team obtained the number of VA's active warrants from the Federal Acquisition Institute Training Application System.

Internal Controls

The team determined that performing an internal control step was not necessary unless internal control deficiencies were noted during the review. The team did not find any significant internal control deficiencies.

Fraud Assessment

During this review, the team assessed the risk that fraud and noncompliance with provisions of laws, regulations, contracts, and grant agreements, significant within the context of the review objectives, could occur. The OIG did not identify any instances of fraud or potential fraud during this review.

⁴⁵ For FY 2020, the three VHA RPOs and the three acquisition centers were responsible for about 98 percent of VA's funds. As the HCAs for the Veterans Benefits Administration, National Cemetery Administration, Construction and Facilities Management, and OIG only represented about 2 percent of VA's FY 2020 funds, the review team did not examine them.

Data Reliability

The review team obtained data from the Federal Procurement Data System—Next Generation, Federal Acquisition Institute Training Application System, HRSmart, GAO’s Bid Protest System, and a spreadsheet from OAL with the number of warrants rescinded due to performance reasons. The data obtained from these sources were used as background and not as the primary evidence in the OIG’s findings. The OIG determined the data were sufficiently reliable for the review objectives.

Government Standards

The OIG conducted this review in accordance with the Council of the Inspectors General on Integrity and Efficiency’s *Quality Standards for Inspection and Evaluation*.

Appendix C: Management Comments

Department of Veterans Affairs Memorandum

Date: September 14, 2021

From: Principal Executive Director, Office of Acquisition, Logistics, and Construction and Chief Acquisition Officer (003)

Subj: Office of Inspector General (OIG) Draft Report: Contracting Officer Warranting Program Meets Federal Requirements, but Could Be Strengthened, Project Number 2020-01910- AR-0002 (VIEWS 05557976)

To: Assistant Inspector General for Audits and Evaluations (52)

1. The Office of Acquisition, Logistics, and Construction (OALC) responds to OIG's request to provide comments on the subject draft OIG report. OALC concurs with all the findings and recommendations in the report and is working with key stakeholders to determine if additional or revised guidance is needed.

The OIG removed point of contact information prior to publication.

(Original signed by)

Michael D. Parrish

Attachment

Attachment

Department of Veterans Affairs (VA) Comments to
Office of Inspector General (OIG) Draft Report

***Contracting Officer Warranting Program Meets Federal Requirements, but Could Be Strengthened
(Project Number 2020-01910-AR-00)***

OIG made the following three recommendations to the Executive Director of the Office of Acquisition and Logistics:

Recommendation 1: Assess the warrant justification template and determine whether additional information and guidance should be required.

VA Comment: Concur. The Office of Acquisition, Logistics, and Construction (OALC) is currently reviewing the template with key stakeholders and will determine if additional information and guidance is required by December 31, 2021.

Recommendation 2: Determine whether any additional formalized procedures to monitor contracting officer workload should be implemented and required throughout VA.

VA Comment: Concur. OALC has initiated discussions with the Heads of Contracting Activities across the Department and will make this determination by December 31, 2021.

Recommendation 3: Identify updates to warrant program policies that can increase the consistency of standards and practices across VA to promote fairness and stringency of warrant requirements.

VA Comment: Concur. OALC has initiated discussions with the Heads of Contracting Activities across the Department. Potential updates to the warrant program policies will be identified by December 31, 2021.

*For accessibility, the original format of this appendix has been modified
to comply with Section 508 of the Rehabilitation Act of 1973, as amended.*

OIG Contact and Staff Acknowledgments

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