United States Department of Agriculture
Office of Inspector General

Research, Education, and Economics' Compliance with Contractor Past Performance Reporting Requirements

Audit Report 50601-0001-12
March 2016

Research, Education, and Economics' Compliance with Contractor Past Performance Reporting Requirements
Audit Report 50601-0001-12

What Were OIG's Objectives

Our objective was to determine whether the REE mission area was recording past performance evaluations in CPARS.

What OIG Reviewed

We compared all of the applicable contract actions (192 contract actions, totaling approximately $64 million) from the Integrated Acquisition System to the contractor reports in CPARS for fiscal year (FY) 2013 contract actions. We analyzed data, conducted interviews with applicable personnel, and reviewed relevant documentation.

What OIG Recommends

We recommend REE identify what is needed to achieve and maintain compliance with current CPARS requirements, incorporate the corrective actions into its processes, and develop a notification structure for follow-up between the HCAD and the three BSCs.

OIG Reviewed Whether the REE Mission Area was Recording Contractor Past Performance Information in the Contractor Performance Assessment Reporting System.

What OIG Found

In September 2010, the Office of Procurement and Property Management (OPPM) released a procurement advisory officially establishing the Contractor Performance Assessment Reporting System (CPARS) as the system used to collect, maintain, and disseminate contractor performance evaluations. We found that the Research, Education, and Economics (REE) mission area did not always enter or complete contractor past performance evaluations in CPARS, as required. This occurred because the REE Head of the Contracting Activity Designee (HCAD) office did not follow an aspect of an APD alert that requires the HCAD to receive explanations and corrective actions for overdue CPARS and because of staffing issues faced by REE's Business Service Center (BSC) Acquisition Branch while working through the CPARS' backlog. As a result, contracting officials do not have complete, timely, and accurate information on contractor performance to make informed decisions when awarding new Federal contracts. Thus, the Federal Government cannot be assured it is doing business with companies that deliver quality goods and services on time and within budget.

Although REE agreed with our recommendations, we were not able to reach management decision on the two recommendations.

United States Department of Agriculture
Office of Inspector General
Washington, D.C. 20250

DATE: March 23, 2016

AUDIT NUMBER: 50601-0001-12

TO:

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SUBJECT: Research, Education, and Economics' Compliance of Contractor Past Performance Reporting Requirements

This report presents the results of the subject audit. Your written response, dated March 10, 2016, is included in its entirety at the end of the report. Excerpts from your response and the Office of Inspector General's (OIG) position are incorporated in the relevant sections of the report.

Based on your written response, management decision has not been reached on Recommendations 1 and 2. The action needed to reach management decision on these recommendations is described under the relevant OIG Position section in the audit report.

In accordance with Departmental Regulation 1720-1, please furnish a reply within 60 days describing the corrective actions taken or planned, and timeframes for implementing the recommendations for which management decisions have not been reached. Please note that the regulation requires management decision to be reached on all recommendations within 6 months

from report issuance, and final action to be taken within 1 year of each management decision to prevent being listed in the Department's annual Agency Financial Report. Please follow your internal agency procedures in forwarding final action correspondence to the Office of the Chief Financial Officer.

We appreciate the courtesies and cooperation extended to us by members of your staff during our audit fieldwork and subsequent discussions. This report contains publically available information and will be posted in its entirety to our website (http://www.usda.gov/oig) in the near future.

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Background and Objectives

Background

This audit is one in a series of reports on the Department of Agriculture's (USDA) mission areas to determine USDA's compliance with contractor past performance reporting requirements. For this audit, we selected the Research, Education, and Economics (REE) mission area, which has the responsibility for advancing scientific knowledge related to agriculture through research, extension,[1] and education. In FY 2013, the REE mission area issued contract actions, totaling over $162 million, which were documented in USDA's Integrated Acquisition System (IAS).[2]

The Federal Acquisition Regulation (FAR) establishes the Head of the Contracting Activity (HCA) as the official who has overall responsibility for managing the contracting activity.[3] Based on FAR, USDA's Agriculture Acquisition Regulation allows the HCA to designate an individual from each of USDA's various contracting activities to carry out the functions of the HCA—the Head of the Contracting Activity Designee (HCAD)—and allows the HCAD to exercise all authority delegated to the HCA.[4]

Agricultural Research Service's (ARS) Administrative & Financial Management (AFM) component is responsible for procurements for ARS, the National Institute of Food and Agriculture, the Economic Research Service (ERS), and the National Agricultural Statistics Service, which all make up the REE mission area. The director of ARS' Acquisition & Property Division (APD) in ARS' AFM is REE's HCAD and is responsible for ensuring REE's contract evaluations are recorded in the Contractor Performance Assessment Reporting System (CPARS). CPARS is a web-enabled application containing contractor past performance reports and has been designated as the Government-wide reporting system for all applicable contract and order past performance evaluations.[5]

Within ARS' AFM, there are three Business Service Centers (BSC)—Eastern, Western, and National Capital Region. AFM and its BSCs are responsible for working with REE agencies, their customers and partners, and the public to meet administrative and financial management needs through the delivery of business services. There is an acquisition branch within each BSC that provides procurement services for its respective regions. The REE HCAD is responsible for ensuring all procurement requirements are met, which includes compliance with CPARS guidelines. However, in the REE mission area, the HCAD does not provide oversight for the BSCs. ARS' Associate Deputy Administrator for Administrative Management provides

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[1] The Cooperative Extension System is a nationwide, non-credit educational network.

[2] Contract modifications can increase or decrease the value of the contract. The $162 million is a net total, including all contract increases and decreases for FY 2013.

[3] Contracting activity is an element of an agency designated by the agency head and delegated broad authority regarding acquisition functions. 48 CFR 2.101 (May 29, 2014). USDA has 10 contracting activities.

[4] The HCA has the overall responsibility for managing the contracting activity. 48 CFR 2.101 (May 29, 2014).

[5] A web application is a program stored on a remote server and accessed over the Internet via a browser.

oversight for the BSCs, as they are responsible for multiple functions, one of which is to complete CPARS entries.

The Office of Procurement and Property Management (OPPM) released Procurement Advisory 96 in September 2010, which established specific CPARS procedures that each USDA HCAD was required to implement. Although CPARS is the Government-wide past performance reporting system, the procurement advisory officially adopted CPARS as the single USDA system used to collect, maintain, and disseminate contractor performance evaluations. It also includes procedures and responsibilities with regards to CPARS compliance. In addition to OPPM requirements, ARS provided further CPARS guidance by issuing APD Alert 2012-04, which requires that the BSC Acquisition Branch Chiefs monitor performance reviews and provide to the HCAD an explanation and corrective action for those evaluations that have not been completed.

Past performance evaluations are required to be prepared at least annually, and at the time the work under a contract or order is completed.[6] They provide an assessment of a contractor's performance and provide a record, both positive and negative, on a given contract or order for a specific period of time. Each report should be based on objective facts and be supported by program and contract management data. These reports reflect the degree to which contractors have demonstrated their ability to meet cost, schedule, and performance expectations on a specific contract or order.[7] The evaluations also reflect the contractor's record of customer satisfaction, integrity, business ethics, and other important information to help Federal acquisition officials make a more fully informed source selection.[8] The use of CPARS promotes report consistency, increases data integrity, and motivates improved contractor performance. On a weekly basis, completed CPARS reports are transferred to the Past Performance Information Retrieval System, making the reports accessible to contracting officials across the Federal Government for contract award decisions.

Following the implementation of CPARS, the Office of Management and Budget's (OMB) Office of Federal Procurement Policy (OFPP) found performance evaluations across the Government to be incomplete, of poor quality, and lacking sufficient information. Subsequently, OFPP issued memoranda in July 2009 and January 2011 calling for improvements in past performance reporting, stating that source selection officials rely on clear and timely assessments of contractor past performance to make informed business decisions when awarding Federal contracts. Meaningful past performance assessments are critical to ensure that the Government does business with companies that deliver quality goods and services on time and within budget. In March 2013, OFPP issued a memorandum requiring that all Federal agencies gradually implement contractor past performance reporting. By September 30, 2015, agencies were

[6] Past performance evaluations are required for all contracts and orders above the simplified acquisition threshold of $150,000; construction contracts totaling $650,000 or more; and architect-engineer services contracts totaling $30,000 or more, as well as for any construction or architect-engineer services contract that is terminated for default regardless of contract value, FAR 42.15 FAC 2005-74 (July 1, 2014).

[7] FAR 42.15 FAC 2005-74 (July 1, 2014).

[8] This is the process of evaluating a bid or proposal to select the option that represents the best value.

required to report all past performance information for applicable contracts and orders in CPARS.

Prior Office of Inspector General (OIG) reports identified CPARS compliance issues within USDA that indicated the usefulness of further audit work.[9] Also, the Government Accountability Office (GAO) completed a review of agency past performance reporting compliance.[10] Specifically, in August 2014, GAO reported that agencies have generally improved their level of compliance with past performance reporting requirements; however, the rate of compliance varies widely by agency and most have not met the reporting targets. Regarding USDA's compliance levels, GAO reported a compliance rate of 13 percent as of April 2013, and 27 percent as of April 2014. GAO made no recommendations for corrective actions directly to USDA.

Objective

The objective of this audit was to determine whether the REE mission area and its respective agencies and offices were recording contractor past performance information in CPARS for applicable contract actions entered into during FY 2013.

[9] Audit Report 02703-0001-12, *Agricultural Research Service's Contract Closeout Process (Recovery Act)* (Aug. 2013) and Report 50099-0002-12, *Assessment of USDA's Contracting Officer's Representatives (*Mar. 2015).

[10] Audit Report GAO-14-707, *Contractor Performance, Actions Taken to Improve Reporting of Past Performance Information* (Aug. 2014).

Section 1: Compliance with CPARS Reporting Requirements

Finding 1: REE Did Not Always Enter or Complete Contractor Past Performance Evaluations in CPARS

We found that the REE mission area did not always enter or complete contractor past performance evaluations in CPARS, as required. Specifically, REE did not complete 96 of its 192 (50 percent) contract actions requiring contractor past performance evaluations in CPARS for applicable actions entered into during FY 2013. This occurred because the REE HCAD did not follow an aspect of the APD alert that requires them to receive explanations and corrective actions on overdue CPARS evaluations and because of staffing issues faced by REE's BSC Acquisition Branch while working through the CPARS' backlog. As a result, contracting officials do not have complete, timely, and accurate information on contractor performance to make informed decisions when awarding new Federal contracts. Thus, the Federal Government cannot be assured it is doing business with companies that deliver quality goods and services on time and within budget.

OPPM released a procurement advisory in September 2010, which establishes specific CPARS procedures that each USDA HCAD should implement. The procurement advisory established CPARS as the single system used by USDA to collect, maintain, and disseminate contractor performance evaluations. It also includes procedures and responsibilities in regards to CPARS compliance, such as specifying the individuals related to the contract who are responsible for entering the evaluations, as well as the required timeframes for completing certain tasks. For example, it specifies all contracts must be registered in CPARS by agency officials within 30 days of the contract award. In addition to FAR, OPPM, and agency guidance, OMB issued a memorandum in March 2013, requiring Federal agencies to reach 100 percent CPARS reporting compliance by the end of FY 2015.[11]

We found REE did not complete 96 of its 192 (50 percent) contract actions requiring contractor past performance evaluations in CPARS for applicable contract actions entered into during FY 2013. Of the 96 incomplete contract actions requiring an evaluation, 15 (15.6 percent) were not entered in CPARS and 81 (84.4 percent) were incomplete in CPARS. The 192 contract actions totaled approximately $64 million.[12] This occurred due to a combination of challenges faced by the BSC acquisition staff while working through the CPARS' backlog and because the REE HCAD did not follow an aspect of the APD alert. Although the HCAD has taken a number of steps to increase CPARS awareness, including incorporating CPARS metrics into routine meetings in order to communicate REE CPARS compliance levels to REE management, additional improvements are necessary. The alert established that the HCAD is to receive an explanation and corrective action from the BSC Acquisition Branch Chiefs regarding CPARS performance reviews that were not completed. Although the HCAD indicated discussions

[11] OMB's OFPP Memorandum, *Improving the Collection and Use of Information about Contractor Performance and Integrity* (Mar. 6, 2013).

[12] Although REE had over $162 million in contract actions in IAS, only $64 million met the criteria which required them to be entered into CPARS.

pertaining to overdue CPARS evaluations were held at routine meetings, it could not provide sufficient evidence that the BSC's provided explanations and corrective actions as required.

The BSCs faced challenges completing CPARS evaluations and they took measures to address the issue. For FY 2015, the BSCs incorporated CPARS compliance metrics in staff performance plans and the HCAD reiterated requirements to the BSCs during monthly meetings. Despite these measures, the overdue CPARS rate for REE increased during the time of our fieldwork from approximately 52 percent on April 30, 2015, to approximately 56 percent on September 30, 2015. When asked about the backlog of overdue CPARS evaluations, REE responded that approximately 78 percent of the overdue CPARS evaluations within the scope of our review were incomplete due to staffing issues, while the remaining 22 percent were the result of technical errors with the system, such as the need to update the system when a contracting officer for a contract changed.

According to REE officials, the staffing issues noted were due to a combination of factors. For example, ARS, the contracting activity for REE, underwent a reorganization in FY 2012 that prompted some acquisition workforce employees to seek alternate employment, rather than remain with ARS. Also, REE noted it had a large cut in its budget due to sequestration, which further reduced REE's acquisition workforce. REE stated it was able to recoup about 40 percent of these positions; however, many positions remain vacant and REE officials are actively recruiting to ensure these open positions are filled.

REE officials stated that when they are able to achieve a full staffing level, they will be in a better position to achieve 100 percent compliance. As of December 2015, REE was moving forward with job announcements to increase its acquisition staff. Additionally, in an effort to increase CPARS compliance, REE has inserted CPARS compliance metrics into the FY 2016 performance plans of all BSC Directors. A prior OIG audit report recommended ARS establish contract closeout guidance that included a process to resolve the backlog of existing CPARS evaluations.[13] Although final action was achieved, the actions taken did not achieve the compliance level FAR and OMB require.

As a result of REE's noncompliance, contracting officials Government-wide do not have complete, timely, and accurate information on REE contractor performance when awarding new Federal contracts. CPARS also includes data on the contractor's record of customer satisfaction, integrity, business ethics, and other important information to help Federal acquisition officials make a more fully informed contract selection. Ultimately, this lack of information has the potential to cost the Government additional time and money due to contractual inefficiencies. Given the amount of money spent annually on contracts, it is essential that contractors' past performance information be reported to ensure USDA funds are not spent on poor performing contractors. This finding demonstrates that REE is not in compliance with Federal, Departmental, and Agency CPARS reporting requirements. REE needs to take action to ensure reporting in CPARS is completed timely and accurately for the benefit of any entity awarding a contract.

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[13] Audit Report 02703-0001-12, *Agricultural Research Service's Contract Closeout Process (Recovery Act)* (Aug. 2013).

Recommendation 1

Identify what is needed to achieve and maintain compliance with current Contractor Performance Assessment Reporting System (CPARS) requirements and then incorporate the corrective actions into REE's processes.

Agency Response

In its March 10, 2016 response, REE stated:

> Agricultural Research Service (ARS) intends to continue filling 1102 vacancies. In the interim, ARS intends to actively address the overdue assessment backlog by augmenting staffing levels with detail assignments and/or acquisition contractor support and/or having "branch stand-downs" where a segment of a day is solely devoted to this task. Additionally, we will explore shifting workloads across the 1102 workforce to allow more focus on recording CPARS assessments.

REE also stated that it has implemented corrective action.

OIG Position

We are unable to reach management decision based on REE's response. Although the response outlines intended corrective actions, it is unclear as to what has been actually implemented. In order to reach management decision, REE needs to identify a plan of corrective actions including implementation dates and state how these solutions will be incorporated into REE's proceeses.

Recommendation 2

Develop and implement a process for a notification structure for follow-up between the Head of the Contracting Activity Designee's (HCAD) office and the Business Service Centers (BSC) to continually monitor CPARS compliance.

Agency Response

In its March 10, 2016, response, REE stated:

> ARS will require detailed CPARS quarterly reports. These reports will contain explanations as to why specific overdue assessments have not been completed, where they currently are in the process and expected completion dates. These reports will be submitted directly by the BSC Directors to the HCAD with a cc [carbon copy] to the DAAFM's [Deputy Administator, Administrative and Financial Management] office to ensure full visibility of outstanding issues and progress. This new process will continue until REE has fully addressed its CPARS backlog.

REE provided a completion date of July 1, 2016.

OIG Position

We are unable to reach management decision based on REE's response. Because the response described only a temporary process, it does not fully address the recommendation. Although we concur with REE's corrective action, REE states that the new process will continue until REE fully addressees the CPARS backlog. We recommended that REE develop and implement a process to continually monitor CPARS compliance. Therefore, in order to reach management decision, REE's corrective action should be incorporated into its policies and procedures on a long-term basis. OIG also needs to receive a timetable when REE anticipates incorporating the corrective action into its policies and procedures.

Scope and Methodology

We conducted this audit to determine whether the REE mission area (and its respective agencies) was recording contractor past performance information in CPARS for contract actions entered into during FY 2013. Fieldwork was conducted at USDA offices located in Washington, D.C., from April 2015 through February 2016.

We chose our scope period based on CPARS reporting requirements. Contractor past performance evaluations are required at least annually and when the contract or order is completed. Therefore, once a contract is awarded, it is possible a CPARS evaluation will not be completed for up to 485 days. The 485-day calculation is based on the number of days in a typical calendar year (365), plus the maximum number of days allowable for completing an evaluation in CPARS (120). Based on this timeframe, we reviewed contract actions for the REE mission area and its agencies that were issued in FY 2013, since it was the most recent, complete fiscal year that should have had completed CPARS evaluations for all applicable contract actions (485 days from September 30, 2013, is January 28, 2015).

We also assessed whether ARS had achieved final action for a prior OIG audit recommendation that pertained to CPARS and the contract closeout process and if corrective action was effective.[14]

We requested FY 2013 contract action information from OPPM contained in two databases: CPARS and the Integrated Acquisition System (IAS). IAS is a procurement system USDA uses to track acquisition activities for USDA from the initial requisition through award. It is also used for contract management. All data were requested in order to determine the universe of contract actions that required CPARS evaluations. In total, REE had 12,619 contract actions in FY 2013, totaling over $162 million. From this information, we were able to perform testing to identify 100 percent of the CPARS eligible contract actions for the REE mission area and its agencies. This resulted in the identification of 192 contract actions, totaling approximately $64 million, which included all REE contract actions over the simplified acquisition threshold, all construction contracts of $650,000 or more, and all architect-engineer services contracts of $30,000 or more, as well as any construction or architect-engineer services contracts that were terminated for default regardless of contract value.

To determine if REE was complying with current CPARS requirements, we compared 100 percent of the applicable contract actions from IAS to the contractor performance reports from CPARS using computer assisted auditing techniques, specifically the software program ACL Analytics. In addition to analyzing the data, we conducted interviews with appropriate REE and OPPM personnel and reviewed applicable guidance and supporting documentation.

We did not evaluate the accuracy of past performance evaluations or look for supporting documentation regarding the content of the evaluation. Instead, we looked for the compliance level of past performance evaluations reported in CPARS. Additionally, we only relied on data

[14] Audit Report 02703-0001-12, *Agricultural Research Service's Contract Closeout Process (Recovery Act)* (Aug. 2013).

contained within IAS. Although IAS is the procurement system of record for USDA, USDA has other procurement systems that are used for specialized purchases, such as Web Based Supply Chain Management and a Forest Service fire management system. Additionally, we did not perform tests to verify all applicable contract actions were contained within IAS. Therefore, we only conducted an analysis of CPARS compliance with known contract actions contained within IAS.

We conducted this 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 objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Abbreviations

AFM .....Administrative & Financial Management
APD.....Acquisition & Property Division
ARS .....Agricultural Research Service
BSC .....Business Service Center
CPARS .....Contractor Performance Assessment Reporting System
ERS .....Economic Research Service
FAR .....Federal Acquisition Regulation
FY.....Fiscal Year
GAO .....Government Accountability Office
HCA .....Head of the Contracting Activity
HCAD.....Head of the Contracting Activity Designee
IAS .....Integrated Acquisition System
OFPP .....Office of Federal Procurement Policy
OIG.....Office of Inspector General
OMB.....Office of Management and Budget
OPPM.....Office of Procurement and Property Management
REE .....Research, Education, and Economics
USDA.....Department of Agriculture

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USDA'S
INSERT AGENCY'S NAME
RESPONSE TO AUDIT REPORT

United States Department of Agriculture
Research, Education, and Economics
Agricultural Research Service

March 10, 2016

SUBJECT: Management's Response to Recommendations in Audit 50601-0001-12 Research, Education, and Economics' Compliance of Contractor Past Performance Reporting Requirements

TO: Rod DeSmet
Deputy Assistant Inspector General for Audit

FROM: Lisa A. Baldus /s/
Associate Deputy Administrator

Background

In September 2010, the Office of Procurement and Property Management (OPPM) released a procurement advisory officially establishing the Contractor Performance Assessment Reporting System (CPARS) as the system used to collect, maintain, and disseminate contractor performance evaluations. The draft audit report issued by The Office of the Inspector General (OGC) indicates that OIG found that the Research, Education, and Economics (REE) mission area did not always enter or complete contractor past performance evaluations in CPARS, as required. OIG's premise is that this occurred because the REE Head of the Contracting Activity Designee (HCAD) office did not require detailed explanations and corrective actions for past due CPARS evaluations and because of staffing issues faced by REE's Business Service Center (BSC) Acquisition Branches (AB) while working through the CPARS' backlog. As a result, contracting officials do not have complete, timely, and accurate information on contractor performance to make informed decisions when awarding new Federal contracts. Thus, the Federal Government cannot be assured it is doing business with companies that deliver quality goods and services on time and within budget. REE concurs that CPARS compliance needs to be improved: however, there is disagreement on some aspects of the report. Below is a discussion of aspects of disagreement as well as proposed corrective actions in response to OIG's recommendations.

Disagreement with the draft audit report

The statement regarding the cause of REE's lack of CPARS compliance being "because the REE HCAD office did not require detailed explanations and corrective actions for past due CPARS evaluations and because of staffing issues faced by REE's BSC AB while working through the CPARS' backlog." misrepresents the underlying issues. The HCAD's office provided significant oversight regarding adherence to CPARS policies. While increasing those oversight activities can result in added improvements, the fact that detailed status explanations had not been required did not lead to the lack of compliance. The main contributor to REE's lack of compliance was

staffing issues such as high attrition rates due to the recent reorganization and the abolition of positions in response to budget constraints faced due to sequestration.
The draft report also states that "The HCAD was not following all aspects of an Acquisition and Property Division (APD) alert, which established that the HCAD is to receive an explanation and corrective action from the BSC Acquisition Branch Chiefs regarding CPARS performance reviews that were not completed. Specifically, the implemented methods did not include holding detailed discussions about the specific overdue evaluations, documenting the delays specific to each overdue evaluation, or documenting the proposed corrective action for the overdue evaluations". APD Alert 2012-04 states "If performance reviews are not performed, as prescribed in AGAR Advisory 96, the BSC AB Chief must provide an explanation and corrective actions to the REE HCAD." It does not require "holding detailed discussions about the specific overdue evaluations, documenting the delays specific to each overdue evaluation, or documenting the proposed corrective action for the overdue evaluations". As expressed to OIG, regular meetings were held between the BSC AB Chiefs, and Leadership, the HCAD and his office, as well as the Office of the Deputy Administrator, Administrative and Financial Management (DAAFM), where corrective actions were discussed. These discussions satisfy the requirements of the alert. As mentioned above, requiring additional detail may be beneficial. However, it is a misstatement to say that all aspects of the alert were not followed.

Recommendations and Proposed Corrective Actions

OIG Recommendation 1

Identify what is needed to achieve and maintain compliance with current CPARS requirements and then incorporate the corrective actions into REE's processes.

Agency Response

Agricultural Research Service (ARS) intends to continue actively and aggressively work to fill 1102 vacancies. In the interim, ARS intends to actively address the overdue assessment backlog by augmenting staffing levels with detail assignments and/or acquisition contractor support and/or having "branch stand-downs" where a segment of a day is solely devoted to this task. Additionally, we will explore shifting workload across the 1102 workforce to allow more focus on recording CPARS assessments. **Completion date:** Implemented.

OIG Recommendation 2

Develop and implement a process for a notification structure for follow-up between the HCAD office and the BSC to continually monitor CPARS compliance.

Agency Response

ARS will require detailed CPARS quarterly reports. These reports will contain explanations as to why specific overdue assessments have not been completed, where they currently are in the process and expected completion dates. These reports will be submitted directly by the BSC Directors to the HCAD with a cc to the DAAFM's office to ensure full visibility of outstanding

issues and progress. This new process will continue until REE has fully addressed its CPARS backlog. **Completion date:** July 01, 2016.

Questions regarding this memorandum can be directed to Michael Barnes, Director, Acquisition and Property Division, Head of the Contracting Activity Designee, REE on 301-504-1734 or via e-mail at Michael.Barnes@ars.usda.gov .

cc:
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