



Office of Audits  
Office of Inspector General  
U.S. General Services Administration

# Audit of the Infrastructure as a Service Blanket Purchase Agreements

*Report Number A110172/Q/A/P12008  
June 4, 2012*



Office of Audits  
Office of Inspector General  
U.S. General Services Administration

## REPORT ABSTRACT

### OBJECTIVE

The objective of this audit was to determine if the Federal Acquisition Service's Office of Integrated Technology Services planned, awarded, and documented the Infrastructure as a Service Blanket Purchase Agreements in accordance with the Federal Acquisition Regulation, the General Services Administration Acquisition Manual, and other applicable policies. If not, identify improvements the Office of Integrated Technology Services can make to assist in planning, awarding, and documenting future blanket purchase agreements.

**Acquisition Programs  
Audit Office (JA-A)  
241 18<sup>th</sup> Street South  
Suite 607  
Arlington, VA 22202  
(703) 603-0189**

### Audit of the Infrastructure as a Service Blanket Purchase Agreements

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### WHAT WE FOUND

We identified the following during our audit:

Finding 1 – The lack of a strategy to determine the number of Blanket Purchase Agreements to award reduced the effectiveness of the Blanket Purchase Agreements.

Finding 2 – A Blanket Purchase Agreement was awarded to an offeror that did not meet the technical requirements of the solicitation.

Finding 3 – The absence of collaboration between evaluation teams reduced the Government's ability to realize maximum cost savings of cloud-based solutions.

Finding 4 – The contract file documentation did not support award decisions and did not provide a complete history of the acquisition.

### WHAT WE RECOMMEND

We recommend the Commissioner of the Federal Acquisition Service:

1. Strengthen the Integrated Technology Services' Contract Review Board process for high dollar, complex, and/or highly visible acquisitions. Specifically, the Contract Review Board should:
  - a. Verify that acquisition personnel adequately address special considerations associated with the contract vehicle chosen in the acquisition strategy;
  - b. Confirm that award decisions are supported by the results of evaluation determinations; and
  - c. Review the contract file to verify a complete history of the acquisition is established in the official file of record.
2. Review the BPA award to the offeror that did not meet the technical requirements of the solicitation and take action to ensure compliance with applicable procurement regulations.
3. Structure future acquisition teams to encourage collaboration and leverage the expertise of all team members.

### MANAGEMENT COMMENTS

The Commissioner of the Federal Acquisition Service concurred with the report recommendations. See **Appendix B** for management's full response.



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**Office of Audits  
Office of Inspector General  
U.S. General Services Administration**

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DATE: June 4, 2012

TO: Steven J. Kempf  
Commissioner, Federal Acquisition Service (Q)

FROM: Lindsay S. Mough *Lindsay S Mough*  
Audit Manager, Acquisition Programs Audit Office (JA-A)

SUBJECT: Audit of the Infrastructure as a Service Blanket Purchase Agreements  
Report Number A110172/Q/A/P12008

This report presents the results of our audit of the Infrastructure as a Service Blanket Purchase Agreements. Our findings and recommendations are summarized in the Report Abstract. Instructions regarding the audit resolution process can be found in the email that transmitted this report.

Your written comments to the draft report are included in **Appendix B** of this report.

If you have any questions regarding this report, please contact me or any member of the audit team at the following:

Lindsay Mough	Audit Manager	<a href="mailto:lindsay.mough@gsaig.gov">lindsay.mough@gsaig.gov</a>	703-603-0269
Susan Myers	Auditor-In-Charge	<a href="mailto:susan.myers@gsaig.gov">susan.myers@gsaig.gov</a>	703-603-0222
Jeremy Martin	Auditor	<a href="mailto:jeremy.martin@gsaig.gov">jeremy.martin@gsaig.gov</a>	703-603-0227

On behalf of the audit team, I would like to thank you and your staff for your assistance during this audit.

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## ***Introduction***

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Cloud computing is a major component of both the President's initiative to modernize information technology and the Office of Management and Budget's Cloud First Policy. Cloud computing allows agencies to reduce information technology costs by using commercially available technology based on virtualization of servers, databases, and applications. The federal cloud computing initiative promotes sharing and reusing common infrastructure, information, and solutions across the Government. The overall goal of the transition to cloud-based services is to create a more agile federal enterprise using on-demand services to meet the Government's needs.

To help achieve this goal, GSA created and launched a portfolio of cloud computing service offerings including cloud-based Infrastructure as a Service, Software as a Service, and Platform as a Service. Infrastructure as a Service provides storage, computing power, and web hosting without the need to expand existing infrastructure. As part of its efforts to bring cloud solutions to the federal marketplace, GSA developed a charter to create the Cloud Computing Services Program Management Office (cloud PMO). This charter outlined the roles and responsibilities for cloud services offerings within GSA. Under this charter, the Federal Acquisition Service is responsible for all cloud offerings while the Office of Citizen Services and Innovative Technologies is responsible for ensuring cloud services meet customer requirements.

In May 2010, the Federal Acquisition Service issued a solicitation to Schedule 70 contractors for the Infrastructure as a Service Blanket Purchase Agreements (BPAs). In October and November 2010, BPAs were awarded to 12 contractors. The BPAs offer customers three service categories or lots:<sup>1</sup> cloud storage services, virtual machines, and cloud web hosting. These service offerings are provided to ordering agencies at or below the contractors' Schedule 70 prices.

Our objective was to determine if the Federal Acquisition Service's Office of Integrated Technology Services planned, awarded, and documented the Infrastructure as a Service BPAs in accordance with the Federal Acquisition Regulation (FAR), the General Services Administration Acquisition Manual (GSAM), and other applicable policies. If not, identify improvements the Office of Integrated Technology Services can make to assist in planning, awarding, and documenting future BPAs.

See **Appendix A** – Purpose, Scope, and Methodology for additional details.

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<sup>1</sup> There are eighteen Contract Line Item Numbers (CLINs) between the three lots. Within each CLIN, there are subCLINs that are priced individually.

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## Results

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The Office of Integrated Technology Services did not fully plan, award, and document the BPAs in accordance with the FAR and GSAM. In addition, the BPAs were not reviewed by an Integrated Technology Services Contract Review as required by Acquisition Notice QTA-2008-07 Revision 4. A Contract Review Board is established to determine if specific contractual actions comply with applicable laws and regulations and reflect sound business judgment. Instead of convening a formal Contract Review Board, certain documents related to the BPAs were evaluated independently by various individuals within the Federal Acquisition Service and the Office of Citizen Services and Innovative Technologies.

While we recognize that GSA views bringing cloud solutions to the federal marketplace as a priority, this should not come at the expense of sound contracting practices. Overall, we identified improvements the Office of Integrated Technology Services can make in planning, awarding, and documenting future BPAs.

### **Finding 1 – The lack of a strategy to determine the number of Blanket Purchase Agreements to award reduced the effectiveness of the Blanket Purchase Agreements.**

The contracting officer did not base the number of BPAs to award on a strategy to maximize the effectiveness of the Infrastructure as a Service BPAs. Instead, the contracting officer planned to award to any offerors able to meet the requirements cited in the solicitation.

FAR 8.405-3(a)(1) outlines four factors to consider when determining the number of BPAs to award: (1) scope and complexity of the requirement(s), (2) the need to periodically compare multiple technical approaches or prices, (3) the administrative costs of BPAs, and (4) the technical qualifications of the schedule contractor(s). The contracting officer did not take these factors into account and thereby diminished the value of non-technical evaluation factors. This, in turn, affected the contracting officer's ability to obtain the best value for the Government.

In this case, a formal Contract Review Board was not convened to evaluate these awards. Even if it had been, it may not have identified that a strategy to determine the number of BPAs to award was not developed. The FAR cite referenced above is specific to BPAs, and the Contract Review Board policy does not account for special considerations specific to certain contracting vehicles. Changing the policy in this regard could strengthen future Contract Review Board evaluations.

## **Finding 2 – A Blanket Purchase Agreement was awarded to an offeror that did not meet the technical requirements of the solicitation.**

The contracting officer awarded a BPA to an offeror that did not meet the technical requirements of the solicitation. The contracting officer made this decision based on the premise that prior to doing business under the BPA, the offeror would undergo an Assessment and Authorization process that would ensure the offeror met technical requirements. However, shifting the determination of compliance with technical requirements to the Assessment and Authorization process and awarding this BPA was not a sound decision.

FAR 8.405-2(d) states that all responses received shall be evaluated using the criteria provided to the schedule contractors. The solicitation outlined four non-price factors<sup>2</sup> to be evaluated using a Pass/Fail methodology. The technical evaluation team failed one offeror for not meeting all technical requirements of the Infrastructure as a Service technical evaluation factor. Specifically, the offeror was unable to affirm that a specific requirement necessary to obtain a security authorization through the Assessment and Authorization process<sup>3</sup> would be available at time of award. Awardees are responsible for obtaining and maintaining a valid authorization in order to hold a BPA.

Although the technical evaluation team identified an offeror as not meeting the technical requirements of the solicitation, the contracting officer awarded a BPA to this offeror. The contracting officer stated that the Assessment and Authorization process would serve as a final control to ensure awardees are technically acceptable. However, the solicitation outlines that BPAs awards would be made to responsible offerors determined to be technically acceptable with fair and reasonable prices. Based on the evaluation criteria in the solicitation, a BPA should not have been awarded to this offeror. FAS should review this award and take action, as appropriate.

To help prevent unsound award decisions in the future, the Contract Review Board process should be strengthened. While the Contract Review Board is responsible for reviewing source selection decisions to ensure sound business judgment is reflected, the policy does not specify what documentation should be examined in reviewing source selection decisions. In this case, the offeror was documented as technically acceptable in the Source Selection Decision Document, but not in the technical team's consensus evaluation documentation. Therefore, a Contract Review Board may not have identified this discrepancy. While we do not expect the Contract Review Board to reconstruct the entire award or question the contracting officer's award decisions, confirming that source selection decisions are adequately supported could strengthen the review process.

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<sup>2</sup> The four non-price factors include: Cloud Technical Requirements, Infrastructure as a Service Technical Requirements, Lot Specific Technical Requirements, and Past Performance.

<sup>3</sup> GSA conducts an Assessment and Authorization process to ensure awardees' information security practices are functionally equivalent to those outlined in the National Institute of Standards and Technology Special Publication 800-53, Recommended Security Controls for Federal Information Systems, for moderate impact systems.

### **Finding 3 – The absence of collaboration between evaluation teams reduced the Government’s ability to realize maximum cost savings of cloud-based solutions.**

The price evaluation team did not perform a reliable price analysis and did not work effectively with the technical evaluation team to ensure the awards represented the best value for the customer. FAR 8.4 states that a BPA established with a schedule contractor should represent the best value, resulting in the lowest overall cost alternative considering price, special features, and administrative costs.

To determine best value, the acquisition team should evaluate prices in conjunction with other factors, such as technical terms and conditions. However, the acquisition team was structured in a manner that did not promote collaboration between the two evaluation teams. Specifically, the pricing evaluation team was comprised of individuals from the Office of Integrated Technology Services, while the technical evaluation team was primarily comprised of individuals from the Office of Citizen Services and Innovative Technologies. This structure made it difficult to leverage the expertise of both teams because they were in different geographical locations and organizations. Ultimately, the price evaluation team placed too large of an emphasis on the proposed discounts and did not conduct a more comprehensive analysis of prices. Therefore, the awards did not necessarily represent the best value for the Government. For example:

- An offeror proposed a 90 percent discount from its Schedule 70 contract prices, while another offeror proposed no discount. Even with a 90 percent discount, the price was higher than the non-discounted price. Although an offeror may propose a large discount, its price may not be competitive when compared to the price of another offeror.
- Two offerors, acting as resellers for the same third-party partner, were awarded identical subCLINs. However, one offeror’s average quoted price was approximately 55 percent higher than the other. As a result, customer agencies may pay different prices for identical items depending on which BPA they use in placing their order.
- The price evaluation team identified one subCLIN in which the highest price quoted was \$75.00 and the lowest was \$0.00018 but did not determine the reason for this discrepancy in pricing. We reviewed a sample of 56 subCLINs and found that the highest price offered ranged from 61 percent to 42 million percent above the lowest price offered. These large pricing variances may indicate that offerors do not understand the requirements in the solicitation.

The price evaluation team stated that differences in terms and conditions could be the reason for these offerors’ higher prices. However, there is no evidence that terms and conditions were analyzed in conjunction with pricing. Meeting with the technical evaluation team to discuss the price variances in relation to terms and conditions could have ensured that the BPAs represented the best value for the Government. Without collaboration between the two teams, the maximum cost savings that are a touted benefit of using cloud-based solutions may not have been realized.



#### **Finding 4 – The contract file documentation did not support award decisions and did not provide a complete history of the acquisition.**

The contract file was not documented in accordance with the requirements of FAR 4.801(b). Some key contract documents could not be found while others were located outside the contract file. As such, the contract file was incomplete and certain contracting actions were not adequately supported.

Documents related to the evaluation of offerors were missing from the contract file; therefore, a complete background for award decisions was not available. FAR 4.801(b) states that contract files should constitute a complete history of the transaction in order to support actions taken. Two of the twelve summary worksheets supporting the source selection recommendations could not be found. Without these key documents, the award decisions are not fully supported.

Documentation supporting the evaluation of the offerors and the legal review were not in the contract file and it took 5 weeks to locate technical evaluation documentation. In addition, we had to request the pricing evaluation documentation multiple times because two individuals maintained their respective analyses outside the contract file. Further, evidence of legal review was not in the contract file and the contracting officer could only provide email correspondence from legal counsel. Although these records were eventually located, looking for them delayed our audit. More importantly, this situation raises concerns about safeguarding proprietary information.

#### **Other Observations**

- The BPAs do not offer a total solution to assist ordering agencies in the transition from a traditional to a cloud-based information technology structure. According to the acquisition plan, the BPAs would fulfill the Government's requirement for easy access to cloud computing. Despite this goal, the cloud PMO did not ensure professional services required for migration to the cloud were included under the BPAs. The PMO charter does not outline specific responsibilities for planning the BPAs, could have contributed to not planning for these necessary services. Ultimately, ordering agencies may need to use an additional contract vehicle to procure a complete cloud solution, which does not support FAS's goal of easy access to cloud computing. FAS personnel informed us that they recognized this and included professional services in a subsequent cloud-based BPA solicitation.
- The contracting officer did not evaluate a diverse set of contractor performance reports. For one offeror, the contracting officer sampled 3 of 23 available reports. All three reports were completed by the same assessor and two rated the same contract. For another offeror, the contracting officer sampled 3 of 13 available reports; the same assessor completed two of these reports. While we do not expect the contracting officer to sample all past performance information, there should be some effort to obtain a more diverse set of past performance

information. By not sampling a more diverse set of reports, the contracting officer may not obtain a thorough representation of the offeror's past performance.

- The price evaluation team created a competitive price range based on initial price offerings but did not update the range to reflect the final prices submitted. We compared the initial and final price quotations for 5 of the 12 awardees<sup>4</sup> and identified discounts from the initial prices ranging from 0 to 50 percent. One offeror increased its final quoted price for eight subCLINs by 13 percent. As a result, the competitive price range shifted, affecting the competitiveness of the prices offered. Evaluation of future BPAs should be performed on the prices offered in the final quotation revisions.

## Recommendations

We recommend that the Commissioner of the Federal Acquisition Service:

1. Strengthen the Integrated Technology Services' Contract Review Board process for high dollar, complex, and/or highly visible acquisitions. Specifically, the Contract Review Board should:
  - a. Verify that acquisition personnel adequately address special considerations associated with the contract vehicle chosen in the acquisition strategy;
  - b. Confirm that award decisions are supported by the results of evaluation determinations; and
  - c. Review the contract file to verify a complete history of the acquisition is established in the official file of record.
2. Review the BPA award to the offeror that did not meet the technical requirements of the solicitation and take action to ensure compliance with applicable procurement regulations.
3. Structure future acquisition teams to encourage collaboration and leverage the expertise of all team members.

## Management Comments

The Commissioner of the Federal Acquisition Service concurred with the report recommendations. Management's written comments to the draft report are included in their entirety as **Appendix B**.

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<sup>4</sup> Our initial sample included six awardees; however, only five were analyzed because we could not determine if the industrial funding fee was included in the initial price quote for one of the awardees.

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## ***Conclusion***

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The Office of Integrated Technology Services did not fully plan, award, and document the BPAs in accordance with the FAR and GSAM. In addition, the BPAs were not reviewed by an Integrated Technology Services Contract Review Board in accordance with Acquisition Notice QTA-2008-07 Revision 4. Specifically we found the following: (1) a strategy to determine the number of BPAs to award was not developed, (2) a BPA was awarded to an offeror that did not meet the technical requirements of the solicitation, and (3) collaboration between evaluation teams did not occur. We also identified that the contract file documentation does not support award decisions and does not provided a complete history of the acquisition. These issues reduced the overall effectiveness of the BPAs and affected the Government's ability to leverage the benefits of using BPAs.

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## **Appendix A – Purpose, Scope, and Methodology**

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Report Number A110172/Q/A/P12008

### **Purpose**

The General Services Administration (GSA) Office of Inspector General included this audit in its Fiscal Year 2011 Audit Plan.

### **Scope**

The audit's scope was limited to the award and administration of the Infrastructure as a Service Blanket Purchase Agreements (BPAs).

### **Methodology**

To accomplish our objective, we:

- Reviewed relevant criteria from the Federal Acquisition Regulation, General Services Administration Acquisition Manual, GSA Orders, and Office of Integrated Technology Services Acquisition Notices.
- Analyzed documents contained in the BPA master contract file.
- Sampled 6 of the 12 awardees to review the individual technical evaluations, clarification letters, and past performance evaluations. This was a risk-based judgmental sample based on the preliminary results of the survey phase of this audit.
- Performed an in-depth analysis of the price evaluation for all awardees.
- Reviewed all available consensus technical evaluation documentation for the awardees.
- Verified the annual review of all the BPAs, and the modifications necessary to schedule contracts to be eligible for BPA award.
- Interviewed personnel from the Federal Acquisition Service and the Office of Citizens Services and Innovative Technologies and obtained responses to questions and observations from our analysis of the contract files.

We conducted the audit between June 2011 and December 2011 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 that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

### **Internal Controls**

The examination of internal controls was limited to the blanket purchase agreements reviewed during this audit. Thus, our evaluation of internal controls was limited to items discussed in the Results section of this report.

## Appendix B – Management Comments


Report Number A110172/Q/A/P12008



GSA Federal Acquisition Service

May 24, 2012

MEMORANDUM FOR KENNETH CROMPTON  
DEPUTY ASSISTANT INSPECTOR GENERAL  
FOR ACQUISITION AUDITS (JA-A)

FROM: *For:* STEVEN J. KEMPF   
COMMISSIONER  
FEDERAL ACQUISITION SERVICE (Q)

SUBJECT: GSA Draft Report, "Audit of the Infrastructure as a Service  
Blanket Purchase Agreements"  
Report #A110172

Thank you for the opportunity to provide management comments to the above report. We concur with the report recommendations to strengthen our acquisition processes and procedures and have taken and will take actions to address them, as detailed in the attached document. Additionally, our review of specific findings and facts in your report leads us to conclude that the Infrastructure as a Service BPAs continue to provide valuable and pioneering support to public sector agencies implementing the government's Shared First and Cloud First strategies.

Please call me at (703) 605-5400 if you have any questions. Your staff may contact Michael McFarland at (703) 306-6370 or [michael.mcfarland@gsa.gov](mailto:michael.mcfarland@gsa.gov) for additional information.

cc: Lindsay Mough (JA-A)

Attachments

U.S. General Services Administration  
2200 Crystal Drive  
Arlington, VA 20406-0003  
[www.gsa.gov](http://www.gsa.gov)

Audit of the Infrastructure as a Service Blanket Purchase Agreements  
Report Number A110172

### FAS Comments

FAS management has reviewed the GSA Inspector General's Review of the Infrastructure as a Service Blanket Purchase Agreements (BPA) and concurs with each of the recommendations. In response to your specific recommendations, FAS has taken or is taking the following actions:

#### Recommendations

**Recommendation 1 - Strengthen the Integrated Technology Services' Contract Review Board process for high dollar, complex, and/or highly visible acquisitions. Specifically, the Contract Review Board should:**

- a. *Verify that acquisition personnel adequately address special considerations associated with the contract vehicle chosen in the acquisition strategy;*
- b. *Confirm that award decisions are supported by the results of evaluation determinations; and*
- c. *Review the contract file to verify a complete history of the acquisition is established in the official file of record.*

FAS concurs with this recommendation.

Recognizing the inconsistencies and lack of clarity in its legacy contract review process, under which this IaaS BPA award was made, FAS Integrated Technology Services (ITS) Office of Acquisition Operations (QTA), in February 2011, completely revised and reissued its Contract Review Board (CRB) process guidance with the purpose to promote sound and efficient acquisition operations/documentation practices with attention to strategy, quality, and compliance with law, regulations, and policy. The process institutionalized both i) use of the Integrated Project Team (IPT) to promote effective up-front collaboration among all members of the acquisition team, and ii) independent document review by experienced procurement analysts and by the board that consists of senior contracting managers. This interim CRB process also conformed to the FAS Instruction Letter 2011-15, issued by FAS Office of Acquisition Management in June 2011, requiring all FAS Office of Acquisition Operations to have approved written procedures in place for conducting clearance panels or board reviews.

Under this interim CRB guidance, between February 2011 and April 2012, ITS Office of Acquisition Operations performed more than 45 successful CRB reviews. All significant acquisitions meeting the applicable review thresholds followed the CRB process with no exceptions. It is also noteworthy that the CRB, in more than a few occasions, rejected the CO submissions based on non-compliance or insufficient analysis or support rationale. Based on this experience and the IaaS IG audit recommendations, ITS Acquisition Operations issued the final CRB guidance in May 2012 with further enhancements.

## Appendix B – Management Comments (cont.)

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Specifically, the final CRB guidance requires the acquisition plan review verify that "the documents adequately address special considerations associated with the contract vehicle chosen in the acquisition strategy" and that the pre-award review "confirm that award decisions are supported by the results of evaluation determinations." Please see attached Acquisition Notice: QTA-2012-03.

With respect to the associated audit finding regarding the lack of strategy to determine the number of BPAs, in addition to the CRB process improvements made to address future acquisitions, ITS Acquisition Operations and the cloud program office jointly reviewed the existing number of IaaS BPA awardees (Please see below list of current awardees and their Authorization to Operate (ATO) status). Based on our review and the current challenges involving the ATO process, we have determined that the current number of awardees are appropriate to offer effective cloud IaaS BPA solutions to the government customers.

IaaS BPA Holders		
Lot 1 – Cloud Storage	Lot 2 – Virtual Machines	Lot 3 – Cloud Web Hosting
Eyak Tek CLW Apptis* AT&T CTC Insight	Eyak Tek CLW Apptis* Carahsoft GDIT Autonomic Resources* Verizon* AT&T CTC Savvis CGI*	CGI Federal* Eyak Tek CLW CTC Savvis
6	11	5

\*ATO received

In addition to the CRB review of major acquisitions, ITS Acquisition Operations also reinstated Quarterly Acquisition Management Reviews (AMR) to ensure that contract documentation is complete and consistent across its contracting activities. Contract files will not only be reviewed by the CO and his or her supervisors but randomly selected contract files, regardless of their dollar values, will also be independently reviewed by procurement analysts on a quarterly basis to verify that a complete history of the acquisition is established in the official file of record. Please see attached "Acquisition Notice: QTA-2011-02," dated September 30, 2011.

**Recommendation 2** - Review the Blanket Purchase Agreement award to the offeror that did not meet the technical requirements of the solicitation and take action to ensure compliance with applicable procurement regulations.

FAS concurs with this recommendation.

## Appendix B – Management Comments (cont.)

Report Number A110172/Q/A/P12008

ITS Acquisition Operations and the cloud program office will jointly review the BPAs in accordance with Federal Acquisition Regulation (FAR) 8.405-3(e) to determine appropriate action. The BPA awarded to the offeror that did not meet the technical requirements can be cancelled by the Government unilaterally if the CO determines it appropriate. Prices can be revised or BPAs cancelled if the CO's review indicates the prices are unreasonable.

As for the audit Finding 3 addressing the price variances among the various vendors, it is worth noting that the prices under the Multiple Award Schedules (MAS) BPAs are predicated upon the underlying MAS contract prices that have already been determined to be fair and reasonable. Discounts off of the MAS pricing are encouraged at the time of BPA award and further discounts are typically obtained at time of competitive issuance of task orders under this multiple award BPAs in accordance with its BPA Ordering Procedures. In the cited example of one subCLIN offered at \$0.00018 creating tremendous mathematical price variance, our preliminary review revealed that the offeror may have tactically under-bid the particular subCLIN to receive favorable overall evaluation. In accordance with the FAR, our COs do not discourage such competitive pricing practice as long as it is advantageous to the government and does not pose significant performance risks.

**Recommendation 3** - Structure future acquisition teams to encourage collaboration and leverage the expertise of all team members.

FAS concurs with this recommendation.

Under the revised CRB guidance, acquisition teams now involve a formal Integrated Project Team (IPT) composed of the Program/Project Manager, Contracting Officer, Contract Specialist, Procurement Analyst, Acquisition Division and Branch supervisors to facilitate effective collaboration and leverage available expertise. Each member's specific role is defined in the CRB policy. Prior to when the CRB convenes, the IPT, working together, must agree that the acquisition documents being submitted for CRB review are complete and conform to the required quality standards.

In particular, the newly-added Acquisition Strategy CRB session promotes up-front collaboration by requiring formation of IPT as soon as the notional acquisition strategy has been developed by the CO and Program Office. Under the policy, the team must promptly schedule an oral presentation to the CRB outlining why the proposed acquisition strategy is being recommended and the rationale behind that strategy. This mandatory team discussion, at the very early stage of acquisition planning, serves as a kick-off session among acquisition teams to encourage collaboration and leverage the expertise of all team members throughout the entire acquisition process.



## Appendix B – Management Comments (cont.)

Report Number A110172/Q/A/P12008

May 9, 2012

Acquisition Notice: QTA-2012-03  
Integrated Technology Services (ITS)  
Office of Acquisition Operations (QTA)

**Subject: ITS Non-Multiple Award Schedules (MAS) Contract Review Board (CRB) Process**

This Acquisition Notice supersedes Acquisition Notice QTA-2011-01, QTA-2008-07, and all its revisions.

### 1.0 STANDARD OPERATING PROCEDURES

The Contract Review Board (CRB) will be responsible for conducting effective and efficient reviews of designated Integrated Technology Services (ITS) acquisitions for acquisition strategy, acquisition quality, and compliance with acquisition law, regulations, and policy. The CRB is not a substitute for required supervisory review of contract actions, nor is it a substitute for a requirements review done by the program office. The CRB review process is intended to ensure compliance and not be a venue for editorializing.

### 2.0 MEMBERSHIP AND ATTENDANCE

#### 2.1 INTEGRATED PROJECT TEAM (IPT)

Prior to when the CRB convenes, the Integrated Project Team (IPT), working together, will agree that the acquisition package being submitted for CRB is complete and is ready for review. All non-advisory IPT members will sign the IPT Review Form ([Attachment 1](#)) thereby acknowledging their review of the documents.

##### 2.1.1 IPT COMPOSITION

- Program/Project Manager (PM)
- Contract Specialist (CS)
- Contracting Officer (CO) – “Lead CO”
- Acquisition Division Branch Chief
- Acquisition Division Director
- Procurement Analyst (PA) – Advisory Capacity

#### 2.2 CRB MEMBERSHIP

The CRB shall be comprised of:

- Chair – Director of Office of Acquisition Operations (QTA) (delegable to the Division Director level). A Division Director cannot chair a CRB session if the

QTA-2012-03 CRB

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acquisition is in his/her division.

- Two (2) Board Members – General Acquisition Support Division (QTAB) Director and a member (must be either Acquisition Division Director or Branch Chief level) designated by the QTA Director. If the QTAB Division Director is not available, acting QTAB Division Director may serve. One may not serve as a Board Member for an acquisition conducted by the CO in his/her division or for an acquisition s/he reviewed as a PA.
- PA - Advisory Capacity
- Legal Counsel - Advisory Capacity (optional)

### 2.3 CRB SESSION ATTENDANCE

The Lead CO, the Program/Project Manager (or designee), the CRB Chair, and two Board members must attend, either physically or virtually, the entire duration of the CRB sessions (in case the Lead CO is unavailable, the Chair may permit a substitute). While it is desirable for the CRB membership to remain the same for the entire duration of the acquisition process, it is not required. Those who served in the IPT or assisted in document development are encouraged to attend and participate in CRB discussion.

The Lead CO is encouraged to bring a note taker so that the Lead CO can focus on presenting the information and answer CRB questions.

A GSA associate outside the IPT or CRB may attend specific CRB sessions as an observer with prior consent by the Chair. An observer may not participate in the discussion unless allowed by the Chair.

As a matter of internal operational policy, non-GSA personnel (e.g., contractors or customer agency personnel) shall not be in attendance unless previously approved by the Chair in writing (e.g., email). If contractor attendance is approved, the Chair will notify the legal counsel.

The Lead CO must ensure that all non-1102 participants other than legal counsel have signed Non-Disclosure Agreements (NDA) prior to receiving any documents or attending the CRB session. Before each session, the Chair shall emphasize that an unauthorized dissemination of procurement sensitive information is strictly prohibited.

### 3.0 ROLES AND RESPONSIBILITIES

The role of each CRB member and attendees is outlined below:

3.1 THE QTA DIRECTOR shall designate the Chair and Board Member(s) for each CRB session. S/he shall ensure the CRB Coordinator maintains records of CRB dates, attendees, and decisions.

3.2 THE CHAIR shall ensure the orderly, efficient, and effective administration of all reviews,

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and resolution of all issues before the Board. The Chair shall assure that the Board keeps to the schedule and manages all issues including ruling on the input of Board members when there is disagreement.

- 3.3 **THE BOARD MEMBERS** shall participate in the CRB by providing independent reviews and comments in accordance with standards outlined in subsections 1.0 and 6.1.
- 3.4 **THE GENERAL ACQUISITION SUPPORT DIVISION (QTAB) DIRECTOR** shall serve as a permanent Board member. S/he will advise the Board regarding compliance with standard operating procedures, procurement statute and regulation, and availability of best practices.
- 3.5 **PROGRAM/PROJECT MANAGER (PM)** shall advise the CRB on all operational, technical, and program issues such as interagency agreements, funding, client commitments, and operational impacts. The PM shall ensure that the Lead CO has all the program office input/information needed to address the PA comments and the issues identified by the Board.
- 3.6 **LEGAL COUNSEL** will advise the Board on issues of legal sufficiency. To maintain necessary attorney-client privilege, legal counsel will not participate in CRBs when contractors are present.
- 3.7 **PROCUREMENT ANALYSTS (PA)** shall assist the CRB in two phases. Prior to the CRB, a PA, designated by the QTAB Division Director, shall participate in the IPT and provide informal reviews and advice upon request. After “initial submission” of the acquisition package to the CRB, a PA, designated by the QTAB Division Director (may be the same or different from the PA who participated in the IPT), shall review the package and provide formal written comments to the Lead CO. The comments shall address compliance with standard operating procedures/acquisition regulations, appropriate use of templates (if applicable), best practices, clarity of document, soundness of acquisition business judgment, identification of any risk areas, and verification that the documents adequately address special considerations associated with the contract vehicle chosen in the acquisition strategy.
- 3.8 **CRB COORDINATOR** is the official record keeper of the CRB. S/he assists the Chair in scheduling and coordinating CRB meetings, receives and disseminates documents, assigns case numbers, keeps records of the Board's decisions and recommendations, and files documents, in electronic form, as directed by the QTA Director. The CRB Coordinator role should be rotated among the QTA divisions every six (6) months.
- 3.9 **THE LEAD CO** is the primary acquisition case manager. S/he submits applicable documents to the CRB for review, addresses all comments before and after the CRB, and updates acquisition milestones (see [Attachment 3](#)). The Lead CO shall update and distribute this acquisition milestone timeline to the IPT *monthly* until award.

#### 4.0 **CRB SESSIONS**

QTA-2012-03 CRB

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### 4.0.1 ACQUISITION VALUE FOR DETERMINING CRB APPLICABILITY

In this section, the acquisition value refers to the cumulative maximum potential (estimated or not to exceed (NTE)) value, including options, regardless of the actual cost to the federal government (i.e., in cases of no-cost contracts or contracts with alternate billing methods, the value is the amount of potential business revenue (ceiling) the contractor(s) would expect to receive from the contract).

“\$650,000” refers to the threshold at Federal Acquisition Regulation (FAR) 6.304(a)(1) and shall be automatically updated in accordance with changes in the FAR (under “Approval of the justification”).

“\$5.5 million” refers to the threshold at General Services Administration Acquisition Manual (GSAM) 507.105(c)(1) and shall be automatically updated in accordance with changes in the GSAM (under “Contents of acquisition plans”).

### 4.0.2 OTHER ACTIONS REQUIRING CRB REVIEW AND APPROVAL

The QTA Director may designate contract actions not specifically addressed in this section as subject to the CRB Process. The QTA Director’s designation of these contract actions will be via email to the cognizant Division Director with cc to the QTAB Division Director and CRB Coordinator and shall be maintained in the official CRB record.

### 4.0.3 DURATION OF CRB SESSIONS

Each CRB session should last no more than one (1) hour. The Chair shall exercise discretion to keep unnecessary debate to a minimum and limit non-Board member comments to avoid an extended CRB session.

### 4.1 ACQUISITION STRATEGY SESSION

Once the notional acquisition strategy has been developed by the CO and Program Office, the Lead CO shall promptly schedule an oral presentation to the CRB for the following types of acquisitions:

- Noncompetitive (including socio-economic sole-source), cost-reimbursement, or time-and-materials (T&M)/labor-hour (LH) procurements (e.g., contracts, blanket purchase agreements (BPA), or task/delivery orders) over \$650,000; and/or
- All procurements over \$5.5 million

#### 4.1.1 DOCUMENTS TO BE SUBMITTED FOR THE ACQUISITION STRATEGY SESSION

The Lead CO shall submit the following documents, via email, to the CRB Coordinator,

## Appendix B – Management Comments (cont.)

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with cc to the IPT:

- A signed IPT Review Form (see [Attachment 1](#))
- A CRB Acquisition Strategy Brief (see [Attachment 2](#)) providing a brief description of the acquisition strategy; and
- An Acquisition Milestone Timeline (see [Attachment 3](#)).

### 4.1.2 NON-BINDING COMMENTS

After a brief oral presentation, the Board shall provide non-binding feedback on the proposed acquisition strategy. The Board shall focus on maximizing the effective use of competition and choosing the most appropriate contract type for the requirement as described in the Office of Federal Procurement Policy (OFPP) Memorandum titled "Increasing Competition and Structuring Contracts for the Best Results" (dated October 27, 2009; [http://www.whitehouse.gov/omb/procurement\\_index\\_memo/](http://www.whitehouse.gov/omb/procurement_index_memo/)). The Lead CO shall take the Board's comments under advisement in finalizing the acquisition strategy.

### 4.2 ACQUISITION PLAN (AP) SESSION

The CRB shall review the following Acquisition Planning documents:

- Acquisition Plans for requirements over \$5.5 million;
- Justifications for Other Than Full and Open Competition (FAR Subpart 6.3), Limited Sources Justifications (LSJ) (FAR Subpart 8.4), or Exceptions to the Fair Opportunity process (FAR Subpart 16.5) over \$650,000; and/or
- Determinations for socio-economic sole-source (e.g., FAR 19.1306, 19.1406) other than 8(a) sole-source or the use of Time and Materials (T&M) procurements over \$650,000; and
- The Acquisition Milestone Timeline (see [Attachment 3](#)).

### 4.3 PRE-SOLICITATION SESSION

The CRB shall review the following pre-solicitation documents for all procurements over \$5.5 million:

- The Solicitation (Request for Proposal (RFP) / Request for Quotation (RFQ) / Invitation for Bid (IFB));
- The Evaluation Plan or Source Selection Plan;
- The AP, as approved (for reference purposes and consistency checks only); and

## Appendix B – Management Comments (cont.)

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- The Acquisition Milestone Timeline (see [Attachment 3](#)).

#### 4.4 PRE-AWARD SESSION

The CRB shall review the following pre-award documents for all procurements over \$5.5 million:

- Price Negotiation Memoranda (PNM);
- Technical Evaluation Panel (TEP) Consensus Reports;
- Source Selection Decision Memoranda (if applicable); and
- The Acquisition Milestone Timeline (see [Attachment 3](#)).

Documents for the Pre-Award session will be reviewed for clarity, legal sufficiency, and adequacy of analysis only to confirm that award decisions are supported by the results of evaluation determinations. This CRB session is *not* for approving/disapproving the source selection decision.

#### 4.5 POST-AWARD SESSION

The CRB shall review the following post-award documents:

- Determination and Finding (D&F) and PNM supporting modifications with cumulative total adjustment of the contract ceiling of more than 10 percent *and* more than \$650,000 (e.g., a \$200,000 modification resulting from a reduction of \$300,000 and an increase of \$500,000 is a pricing adjustment exceeding \$650,000; this is same principle as in cost or pricing data threshold at FAR 15.403-4(a)(1)(iii); this does not include incremental funding actions);
- D&F and PNM supporting modifications extending the period of performance by more than 90 days, other than by exercise of pre-existing options (e.g., FAR 52.217-8, Option to Extend Services; 52.217-9, Option to Extend the Term of the Contract);
- CO decision memorandum supporting Claims or Requests for Equitable Adjustments over \$650,000;
- Ratification packages, regardless of monetary value; or
- Proposed contract termination decision memoranda.

#### 5.0 SUBMISSION OF CRB PACKAGE / SCHEDULING OF CRB SESSIONS

All CRB packages, with the exception of those for Acquisition Strategy Sessions, require

a review by the QTAB PA prior to the Board session in accordance with the procedure below.

### 5.1 INITIAL SUBMISSION

The Lead CO shall coordinate with the entire IPT and submit proper, complete, and well-written documentation to the Board for review (see Attachment 1 “IPT Review Form”). Prior to submission, the IPT Review Form must be signed by all necessary parties, including the Program/Project Manager.

The Lead CO shall submit the CRB package, including the signed IPT Review Form, via email, with the subject line “Initial CRB Submission: [Project Name],” to the QTAB Division Director with cc to the CRB Coordinator and the CO’s cognizant Branch Chief and Division Director.

The CRB Coordinator shall record the date of receipt in the official CRB record (“*Initial Submission Date*”).

### 5.2 PROCUREMENT ANALYST (PA) REVIEW

The QTAB Division Director shall promptly assign a PA and notify the Lead CO, and the CO’s cognizant Branch Chief and Division Director of the expected response date. The QTAB Division Director must ensure that the PA is afforded sufficient time to review the documents considering the size and complexity.

The PA shall submit written comments, via email, with the subject line “PA Comments: [Project Name],” to the Lead CO with cc to the CRB Coordinator, the QTAB Division Director, and the CO’s cognizant Branch Chief and Division Director. Each of the PA’s comments shall be numbered for ease of reference.

The CRB Coordinator shall record the date of receipt in the official CRB record (“*Comments Provided Date*”).

### 5.3 FINAL SUBMISSION

The Lead CO, in coordination with the IPT, shall address each of the PA’s comments. The Lead CO shall make judgment of whether to accept or reject comments as appropriate. For each PA comment, the Lead CO shall identify whether it was “Accepted” or “Not accepted.” No further written explanation is required.

The Lead CO will then submit the revised package, along with the PA’s comments and their disposition, to the CRB Coordinator. Submission shall be by email, with the subject line “Final CRB Submission: [Project Name],” with cc to the IPT, QTAB Division Director, PA, and QTA Director.

The CRB Coordinator shall record the date of receipt in the official CRB record (“*Final*

*Submission Date*”).

### 5.4 TIMES AND VENUE

The CRB will convene between two (2) and seven (7) business days after the final submission is made (e.g., if the Lead CO submits the package at 10 a.m. Monday, the CRB will be scheduled anytime between 10 a.m. Wednesday and 10 a.m. the following Wednesday).

At the direction of the QTA Director, the CRB Coordinator will send out calendar invitations and the documents to the Chair, Board members, and IPT.

The CRB review shall be conducted face-to-face or by teleconference.

### 6.0 BOARD'S ACTIONS

Each Board member, prior to the date of the review, shall have read the package. The Board shall have three options: Approve, Approve with Changes, or Reject. In cases where the two Board members disagree, the Chair will have the deciding vote.

### 6.1 CRB DECISIONS

**Approve:** The Board shall review the document and grant approval if it finds the submission complete, compliant with applicable regulations and policies, and in accordance with ITS and GSA business practices. The Board may offer suggestions to the Lead CO and the IPT which may be applied as appropriate.

**Approve with Changes:** If the Board finds sufficient issues with the package, the Board shall discuss and resolve them. The Chair shall facilitate the discussion and identify the changes needed before approval. In addition, the Board may offer suggestions to the Lead CO and the IPT which may be applied as appropriate. The Lead CO and the IPT shall promptly incorporate the required changes and submit the revised package (with changes highlighted) to the Chair and the two Board members, with cc to the CRB Coordinator, for approval.

**Reject:** The Board shall reject insufficient, incomplete, non-compliant packages, or packages of sub-standard quality unsuitable for public records. The CRB will provide reason(s) for rejection, the changes required, and/or issues that must be resolved prior to resubmission for a new CRB session. If a package is rejected, it must go through the Initial Submission and PA Review again before a second CRB session will be scheduled.

The Chair and the members shall provide completed CRB Decision Form (see Attachment 5) to the CRB Coordinator. The CRB Coordinator shall assign a CRB Case Number (consecutively numbered by Fiscal Year, e.g., CRB-12-001), maintain the original for the record, and provide electronic copies to the CRB attendees and the QTA Director. The CRB Decision Form must be completed for the non-decisional Acquisition



Strategy CRBs, as a record of attendance.

### **6.2 DOCUMENT QUALITY REVIEW AND RATING**

Upon conclusion of the CRB session (other than the Acquisition Strategy Sessions), the Chair and the two participating Board members shall individually and anonymously rate the quality of each document reviewed with respect to format, spelling/editing errors, completeness, and overall quality using the CRB Document Quality Review Form (see Attachment 4).

The CRB Coordinator shall promptly collect the ratings and create a combined rating by averaging the scores in each criterion. The combined rating shall be provided by email to the Lead CO with cc to the CO's Branch Chief, Division Director, Chair, and the QTA Director.

The CRB Coordinator shall also indicate in the CRB Document Quality Review form the three (3) submission dates for the subject CRB ("initial submission date," "comments provided date," and "final submission date").

### **7.0 URGENT REQUIREMENTS**

#### **7.1 SPECIAL CRB SESSION**

From time to time, there will be a requirement for the CRB to meet on an expedited basis to manage urgent requirements. These may be handled through a special meeting called by the QTA Director or a virtual review by the CRB.

#### **7.2 INTERIM APPROVAL TO PROCEED IN EXIGENT CIRCUMSTANCES**

On a case-by-case basis, the QTA Director may grant interim approval to proceed for actions for which s/he solely and independently deems it necessary (e.g., an unacceptable delay in the award of a contract caused by unforeseen circumstances; or exigent circumstances requiring immediate action to avoid significant harm to the Government) and delay CRB review until after the contract action is taken. Interim approval to proceed will be requested in writing by the cognizant QTA Division Director via email to the QTA Director.

The request must provide a complete and accurate justification of the need for the interim approval to proceed, including an explanation for any lack of advance planning, and identification of the repercussions expected to be experienced if the approval is not granted. The QTA Director's approval will be in writing via email with cc to the CRB Coordinator and shall be maintained in the official CRB record. Once necessary contract action is taken, the Lead CO shall promptly proceed with the CRB process with the goal of identifying necessary amendment or modification actions and ensuring proper documentation.

## Appendix B – Management Comments (cont.)

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The QTA Director may provide a blanket approval to proceed for actions needed to respond to a National Emergency.

### 8.0 OFFICIAL CRB RECORDS RETENTION

Official CRB decisions shall be maintained in electronic format for two (2) years.

The Lead CO shall ensure that the completed and signed CRB approvals are incorporated into the official contract file.

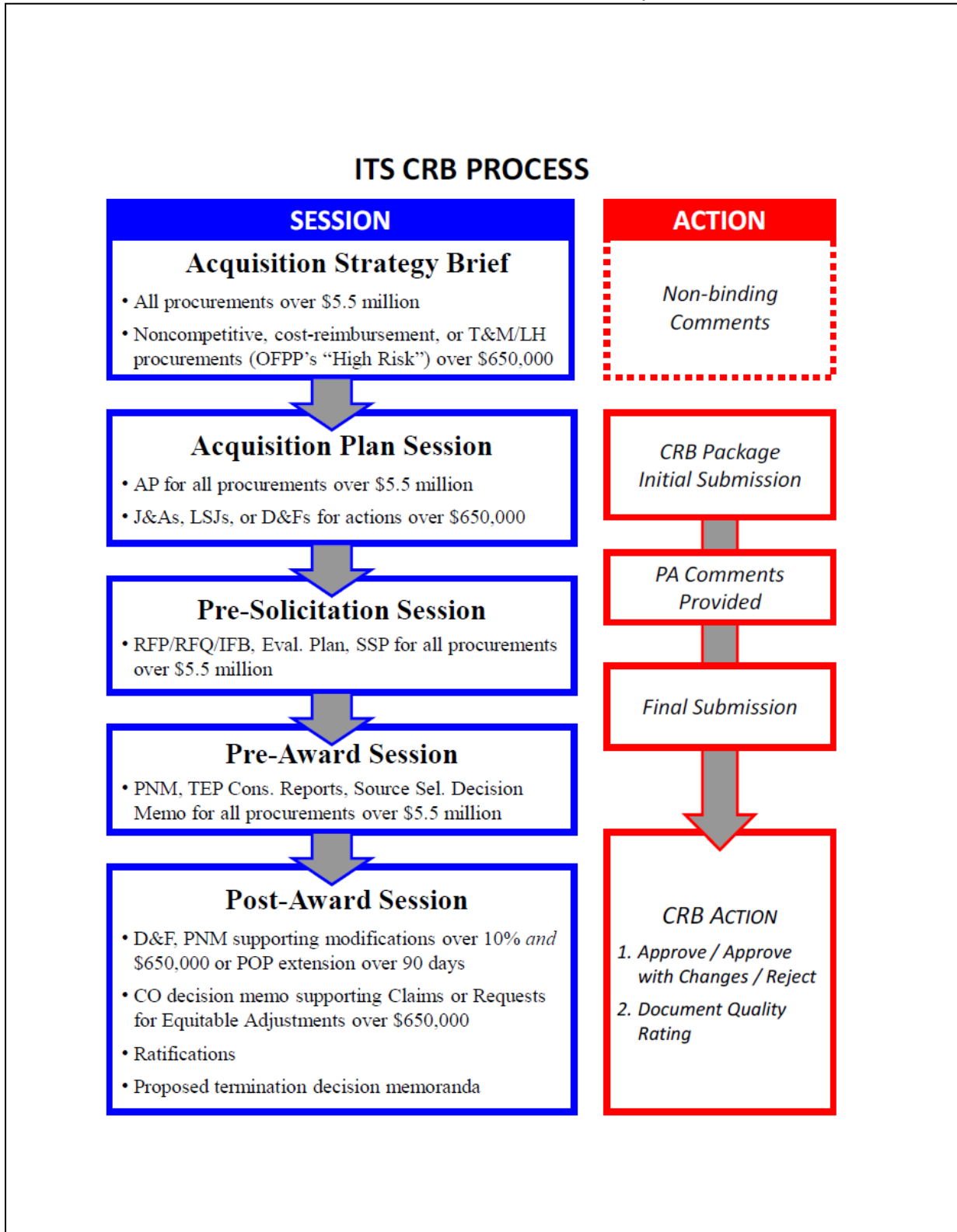
### 9.0 LESSONS LEARNED

The QTAB Division Director shall ensure that the lessons learned, best practices, and successful precedents in the CRB sessions are documented and periodically disseminated throughout QTA.

#### *ISSUED BY:*

Eric B. Cho   
Director  
Office of Acquisition Operations (QTA)

Digitally signed by ERIC CHO  
DN: c=US, o=U.S. Government,  
ou=General Services Administration,  
ou=ERIC CHO,  
ou=2012-05-08 09:47:04-0500  
Date: 2012.05.08 09:47:04-0500



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## ATTACHMENT 1

### IPT REVIEW FORM

Project Title:

Lead CO:

PM:

Document(s):  Acquisition Strategy Brief  AP  J&A/LSJ  
 D&F  RFP/RFQ/IFB  EP/SSP  
 PNM  CO Decision Memo  
 TEP Consensus Report/SSA Decision Memoranda  
 Ratification Package  Other: \_\_\_\_\_

*The Integrated Project Team (IPT) has reviewed the document(s) being submitted and agrees that the package is complete and ready for review.*

**Submitted:**

\_\_\_\_\_  
Contracting Officer (Signature) (Printed Name) Date

\_\_\_\_\_  
Contract Specialist (Signature) (Printed Name) Date

\_\_\_\_\_  
Program/Project Manager (Signature) (Printed Name) Date

**Concur:**

\_\_\_\_\_  
Supervisory Branch Chief (Signature) (Printed Name) Date

\_\_\_\_\_  
Supervisory Div. Director (Signature) (Printed Name) Date

ATTACHMENT 2

**CRB ACQUISITION STRATEGY BRIEF**

Project Title:

Lead CO:

**INTRODUCTION:**

Provide a brief synopsis of the requirements and the proposed acquisition strategy addressing the following—

- Business line for which the action is conducted
- Description of the goods and services to be acquired
- List of IPT members
- Estimated total value
- Acquisition method
- Contract type
- Length of contract
- Competition / Evaluation Scheme

**RATIONALE FOR PROPOSED ACTION:**

Describe why the proposed acquisition strategy is being recommended and the rationale behind that strategy as opposed to another acquisition strategy (i.e., what goes into the AP acquisition alternative section).

## Appendix B – Management Comments (cont.)

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### ATTACHMENT 3

#### ACQUISITION MILESTONE TIMELINE

Project Title:  
Lead CO:  
PM:

ACTION*	TARGET	ACTUAL	RESPONSIBILITY
Requirements (SOW) Completed			PM
Acquisition Strategy Briefing Held			CO
Acquisition Plan (AP) Provided to the CO			PM
Acquisition Plan (AP) Submitted for CRB Review (Initial Submission)			CO
AP Approved by CRB			CO
Solicitation / Evaluation Plan Submitted for CRB Review (Initial Submission)			CO
Pre-solicitation CRB Held			CO
Solicitation OUT			CO
Offers/Quotes IN			CO
Initial Acceptability Determined			CO
Technical Evaluation Complete			PM
Discussions Complete			CO
Final Revised Proposal IN			CO
Final Evaluation Complete			CO
Award Submitted for CRB Review (Initial Submission)			CO
Award			CO

\*Additional steps, such as the PA Review, Final Submission, and routing and approval of the AP may be added by the CO.

*The Lead CO shall update and distribute this acquisition milestone timeline to the Integrated Project Team monthly until award.*

# Appendix B – Management Comments (cont.)

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ATTACHMENT 4

**CRB DOCUMENT QUALITY REVIEW FORM**

Project Title: \_\_\_\_\_

Lead CO: \_\_\_\_\_

CRB Date: \_\_\_\_\_

CRB Session:  Acquisition Plan  Pre-Solicitation  
 Pre-Award  Post-Award

Document(s):  AP  J&A/LSJ  RFP/RFQ/IFB  
 EP/SSP  D&F  
 PNM  CO Decision Memo  
 TEP Consensus Report/SSA Decision Memoranda  
 Ratification Package  Other: \_\_\_\_\_

✓ Initial Submission Date: \_\_\_\_\_  
 ✓ Comments Provided Date: \_\_\_\_\_  
 ✓ Final Submission Date: \_\_\_\_\_

CRITERION <i>(Circle 3, 2, or 1)</i>	GOOD <i>(May contain a few minor errors)</i>	ACCEPTABLE	NEED IMPROVEMENT <i>(Indicates carelessness and lack of proper review)</i>	COMBINED RATING <i>(completed by the CRB Coordinator)</i>
Format / Style	3	2	1	
Spelling / Editing Check	3	2	1	
Completeness	3	2	1	
Overall Document Quality	3	2	1	
Presentation	3	2	1	

*Upon conclusion of the CRB session, the Chair and two Board members shall individually and anonymously rate the quality of each document reviewed. The CRB Coordinator shall promptly collect the ratings (may be by email or verbally), and create a combined rating by averaging the scores in each criterion. The combined rating shall be provided by email to the Lead CO with cc to the CO's Branch Chief, Division Director, Chair, and the QTA Director.*

CRB Case Number: \_\_\_\_\_

# Appendix B – Management Comments (cont.)

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ATTACHMENT 5

**CRB DECISION FORM**

Project Title: \_\_\_\_\_

Lead CO: \_\_\_\_\_

PM: \_\_\_\_\_

CRB Session:  Acquisition Strategy       Acquisition Plan       Pre-Solicitation  
 Pre-Award       Post-Award

Document(s):  Acquisition Strategy Brief       AP       J&A/LSJ  
 D&F       RFP/RFQ/IFB       EP/SSP  
 PNM       CO Decision Memo  
 TEP Consensus Report/SSA Decision Memoranda  
 Ratification Package       Other: \_\_\_\_\_

Decision:  *Approved*       *Approved with Changes*       *Rejected*  
 *Not Applicable (Only for an Acquisition Strategy Session)*

Made by: \_\_\_\_\_  
Chairperson's Signature      (Printed Name)      Date

\_\_\_\_\_   
Member's Signature      (Printed Name)      Date

\_\_\_\_\_   
Member's Signature      (Printed Name)      Date

Attendees: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Special Instructions or Conditions of Approval: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

*The CRB Coordinator shall assign a CRB Case Number (consecutively numbered by Fiscal Year, e.g., CRB-12-001) and maintain the original for the record and provide copies to the CRB attendees and the QTA Director.*

CRB Case Number: \_\_\_\_\_



## Appendix B – Management Comments (cont.)

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September 30, 2011

Acquisition Notice: QTA-2011-02  
Integrated Technology Services (ITS)  
Office of Acquisition Operations (QTA)

**Subject: Quarterly Acquisition Management Reviews (AMR)**

*This Acquisition Notice supersedes Acquisition Notice QTA-2009-03 and all revisions.*

**1. Purpose:**

The purpose of this Acquisition Notice is to reinstate quarterly reviews of contract actions awarded and administered by QTA contracting activities. These internal reviews are intended to i) ensure compliance with applicable laws, regulations, policies, and procedures; and ii) ensure that documentation and standards are consistent across QTA contracting activities. The reviews are not a substitute for required due diligence or supervisory review and approval of contract actions. The General Acquisition Support Division (QTAB) will be responsible for conducting these reviews.

**2. Effective Date: October 1, 2011.**

**3. Standard Operating Procedures:**

a. Actions to be Reviewed:

Within ten (10) business days after the end of each quarter, the QTAB Division Director, in consultation with the QTA Director, shall *randomly* select five (5) contract actions (e.g., new contracts, BPAs, task/delivery/service orders, or modifications) from each operational division to be reviewed. Division Directors will be notified of the actions to be reviewed. Selections will be made from the pool of all actions executed during the two (2) previous quarters, above the simplified acquisition threshold (in case of new awards), notwithstanding whether the actions were reviewed by the Contract Review Board.

In addition, the QTAB Division Director, at his/her own discretion, may select up to two (2) designated (high risks; complex, critical to GSA strategic objectives and mission; and highly visible or politically sensitive) contract actions.

Selection of contract actions will be based on the master list of contracts maintained by QTAB, contract numbers utilized, and information provided by QTA contracting divisions.

b. Submission of Contract Files:

QTA-2011-02 AMR

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## Appendix B – Management Comments (cont.)

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Within five (5) business days after the list is provided, each QTA contracting Division Director shall provide QTAB complete contract files, electronically or in hard copy, and notify the QTA Director.

Within two (2) business days after receipt of the complete files, the QTAB Division Director will collaborate with the Procurement Analyst (PA) reviewers to determine the expected completion date(s) of the reviews and will provide written notification(s) to each respective QTA contracting activity. Considering the size and complexity of each acquisition, the QTAB Division Director must allow sufficient time for review of the selected contract files.

c. Contracting Divisions to be Reviewed:

Each quarter, *two* contracting divisions shall be subject to review with the other two divisions reserved for staggered review the following quarter. QTAA and QTAC shall be the first to be reviewed for the first quarter of the fiscal year.

4. Guidelines Which Will Be Utilized by the QTAB PA Reviewer:

- a. The overriding concerns to which the reviewer will devote attention are--
  - i) All required documents (e.g., clearances, determinations, approvals, SSA appointment letters) are contained in the file;
  - ii) The documents are adequate and appropriate to meet policy, regulatory, and statutory requirements.
- b. Each file will be reviewed to ensure that appropriate internal contracting officer and/or supervisory review(s) and approval(s) were accomplished. The file will be reviewed to determine that it is organized consistent with FAR 4.803, as well as GSAM 504.803, and that each of the applicable documents specified are contained in the file.
- c. In addition to conducting the overall review, the reviewer will devote specific attention to, and identify concerns with, *as well as identify exemplary cases of*, documentation of the following (as applicable):
  - i) Acquisition planning -- evidence of its existence, with particular attention to: requirements associated with market research; Section 508 of the Rehabilitation Act of 1973 (as amended 29 U.S.C. § 794 (d)), small business participation, bundling, source selection, performance based acquisition, environmental, acquisition milestones, and approval information;
  - ii) All required D&F's and other determinations;
  - iii) Funding document is contained in the file, was received prior to release of any solicitation for offers/proposals, and is the appropriate type of funding;
  - iv) Solicitation contained all evaluation factors and significant sub-factors, and includes a description of the relative order of importance;

## Appendix B – Management Comments (cont.)

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- v) Competitive range determination;
  - vi) Technical Evaluation report;
  - vii) Price negotiation memorandum and award decision;
  - viii) Unsuccessful offeror letters meet regulatory requirements for content and time of issuance;
  - ix) FPDS-NG reporting was accomplished and timely;
  - x) Option exercise was timely and includes appropriate analysis and determination prior to exercise of the option;
  - xi) All BPAs have adequate documentation of annual review;
  - xii) Modifications are in-scope and timely;
  - xiii) Federal Awardee Performance and Integrity Information System (FAPIIS) information;
  - xiv) Contractor Performance Assessment Reporting System (CPARS);
  - xv) Congressional notification;
  - xvi) Contracting Officer's Representative (COR) designation;
  - xvii) Quality Assurance Surveillance Plan (QASP) monitoring;
  - xviii) Electronic Subcontracting Reporting System (eSRS); and
  - xix) Pre- and post-award Excluded Parties List System verifications.
- d. For any ambiguities or additional review standards, the PA reviewer shall utilize the Procurement Management Review (PMR) Reference Guide, issued by the Office of the Acquisition Policy (MV).

### **5. Discussions:**

At any time, the QTAB Division Director and PA reviewer may contact QTA contracting representatives to facilitate understanding of the rationale behind the contract action, obtain clarification, or determine the accuracy of observations/findings.

### **6. Post Review Briefing:**

Within five (5) business days after the conclusion of the review, the QTAB Division Director and PA reviewer will hold a post review briefing with the respective QTA Contracting Officers, Branch Chiefs, and Division Director to discuss summary findings/observations for all reviewed actions.

### **7. Documenting Findings/Observations:**

For review purposes, it is necessary to explain how the terms "Observation" and "Finding" will be used during the review.

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Observation -- there may be occasional instances where process improvements, inefficient operations, or technical non-compliances are noted; however, the occurrence does not merit being written up as a finding, but should be corrected. These occurrences shall be treated as observations and noted appropriately in the PA reviewer's spreadsheet and not in the draft/final reports. The QTAB Division Director will determine when an observation should be a finding and thus be included in the draft/final reports.

A Finding is a significant/material deficiency that would have an adverse impact on the overall quality of QTA contracting activities or noncompliance with regulatory or statutory requirement. When writing a Finding, it will be associated with a regulatory, statutory, contract provision, or policy and procedure requirement.

### **8. Preparing and Issuing the Report:**

Two reports will be created for each review -- a draft and a final. A draft report will be prepared by the PA reviewer and submitted to the QTAB Division Director within 15 business days after the conclusion of the post review debrief. The QTAB Division Director will issue the draft report to QTA contracting Division Directors for comments on the findings and recommendations. The QTA Division Directors will have 15 business days to respond and submit comments to the QTAB Division Director.

The QTAB Division Director will then prepare a final summary report (covering all actions reviewed) for each contracting division reviewed. This summary report shall include strengths, weaknesses, and specific recommendations which can be implemented.

QTA contracting Division Directors will have 30 business days from the date of receipt of the final report to provide the QTA Director and QTAB Division Director written responses to each recommendation including the corrective actions taken.

### **9. Lessons Learned:**

The QTAB Division Director shall maintain records of the final AMR reports and the responses received. QTAB shall develop and maintain a checklist to assist contracting personnel in future AMRs and incorporate lessons learned in training.

Eric B. Cho  
Director  
Office of Acquisition Operations (QTA)

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## ***Appendix C – Report Distribution***

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*Report Number A110172/Q/A/P12008*

Commissioner, Federal Acquisition Service (Q)

Deputy Commissioner, Federal Acquisition Service (Q1)

Chief of Staff, Federal Acquisition Service (Q0A)

Assistant Commissioner, Office of Integrated Technology Services (QT)

Director, Office of Acquisition Operations (QTA)

Division Director, GAO & IG Audit Response Division (H1C)

Acting Director, Audits and Controls Division (QB0C)

Assistant IG for Auditing (JA)

Deputy Assistant IG for Investigations (JID)

Director, Audit Planning, Policy, and Operations Staff (JAO)