



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

# Audit of the Digitization of the Federal Acquisition Service's Multiple Award Schedule Contract Files

*Report Number A120028/Q/A/P12010  
September 26, 2012*



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

**REPORT ABSTRACT**

**OBJECTIVES**

The objectives of the audit were to determine: (1) if the Federal Acquisition Service (FAS) has established a comprehensive plan to digitize Multiple Award Schedule (MAS) contract files in support of its commitment to achieve an end-to-end electronic contracting environment and (2) what the impact is if such a plan is not in place.

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**Audit of the Digitization of the Federal Acquisition Service's Multiple Award Schedule Contract Files**

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**WHAT WE FOUND**

We identified the following during our audit:

Finding 1 – The lack of a comprehensive plan led to delays in the MAS contract file digitization effort.

Finding 2 – Issues with contract digitization within the Office of IT Schedule Programs hindered progress and wasted resources.

Finding 3 – System limitations reduce the functionality of the electronic contract file.

**WHAT WE RECOMMEND**

Given that FAS is scheduled to relocate to Central Office in May 2013 and the digitization effort is due to be completed at the end of fiscal year 2013, FAS would have limited time to implement an action plan to address any recommendations we would make. Therefore, we are not making formal recommendations at this time. Instead, we are offering suggestions which may assist FAS in addressing the findings outlined above.

**MANAGEMENT COMMENTS**

In response to our report, management describes actions FAS has taken and will take to address our findings. See **Appendix C** for management comments.



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

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DATE: September 26, 2012

TO: Mary A. Davie  
Acting Commissioner, Federal Acquisition Service (Q)

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

SUBJECT: Audit of the Digitization of the Federal Acquisition Service's Multiple  
Award Schedule Contract Files  
A120028/Q/A/P12010

This report presents the results of our audit of the digitization of the Federal Acquisition Service's Multiple Award Schedule contract files. Our findings are summarized in the Report Abstract. Given that we are not making any formal recommendations, you are not required to perform audit resolution procedures.

Your written comments to the draft report are included in Appendix C 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 S. Mough	Audit Manager	<a href="mailto:lindsay.mough@gsaig.gov">lindsay.mough@gsaig.gov</a>	(703) 603-0269
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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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As part of its push towards green business practices, the General Services Administration's (GSA) Federal Acquisition Service (FAS) established a goal of achieving an end-to-end electronic contracting environment. This effort includes all contract types, and encompasses various FAS initiatives. One initiative is the digitization of hard copy contract files in the Multiple Award Schedule (MAS) program, which covers close to 20,000 contracts with terms up to 20 years.

FAS's file digitization coincides with the plan to consolidate the majority of GSA functions in the Washington, D.C. metropolitan area into GSA's Central Office building. The consolidation will put space in the building at a premium. FAS's planned move date of May 2013 only expedites the need to digitize given that storage for paper contract files will not be available in the Central Office building.

The FAS digitization process includes the following stages: (1) audit, (2) assembly, (3) scanning, (4) quality control, (5) quality assurance, and (6) acceptance.<sup>1</sup> See ***Appendix B – Digitization Process*** for a detailed flowchart of the digitization process.

To facilitate the digitization of MAS contract files and implement the use of the electronic contract file, FAS's Office of the Chief Information Officer developed the Enterprise Content Management Solution (ECMS) as a repository for the electronic contract files. Contract documents from other GSA internal applications, such as eOffer and eMod, automatically migrate into ECMS. Users can then view the electronic contract files stored in ECMS using the Electronic Contract File Web Interface viewer (ECFv).

The objectives of the audit were to determine: (1) if the Federal Acquisition Service has established a comprehensive plan to digitize Multiple Award Schedule contract files in support of its commitment to achieve an end-to-end electronic contracting environment and (2) what the impact is if such a plan is not in place.

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

Given that FAS is scheduled to relocate to Central Office in May 2013 and the digitization effort is not due to be completed until the end of fiscal year 2013, FAS would have limited time to implement an action plan to address any recommendations we would make. Therefore, we are not making formal recommendations at this time. Instead, we are offering suggestions which may assist FAS in addressing the findings discussed in this report.

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<sup>1</sup> Acceptance refers to the formal action of approving the electronic contract file as the official contract file of record and ensures that the electronic contract file is an accurate, complete, and clear representation of the original.

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## **Results**

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FAS did not establish a comprehensive plan to digitize MAS contract files, contributing to unnecessary delays and wasted resources. This largely impacted the Office of IT Schedule Programs (IT Center) since it manages over 5,000 contracts and is scheduled to move to Central Office in May 2013 where storage for hard copy contract files will not be available. In addition, we noted several issues with the electronic contract file application. Although the audit objectives focus on digitization, these issues warrant the attention of FAS management given the effect on the functionality of the electronic contract file and ultimately, on end-to-end electronic contracting going forward.

### **Finding 1 – The lack of a comprehensive plan led to delays in the MAS contract file digitization effort.**

FAS did not establish a comprehensive plan to digitize MAS contract files, which contributed to delays in deciding on a scanning policy and putting a solution in place. A large scale project such as digitization should ultimately have one group responsible for developing a strategy and overseeing the entire project.

While FAS implemented a pilot for the electronic contract file, there was no clear direction for the effort as a whole. At the beginning of the pilot in March 2010, FAS planned to scan all active MAS contract files. However, because there was not one group dedicated to managing the digitization effort, it took FAS more than a year to identify the challenges associated with trying to scan every document. Ultimately in November 2011, FAS decided to scan only the documents related to the most recent option period. To facilitate this new strategy, and in consideration of the impending move, FAS plans to award a blanket purchase agreement to include document storage and retrieval services for offices affected by the move. However, the award has been stalled several times and as of June 2012 the statement of work was still being developed.

We suggest FAS award this blanket purchase agreement with sufficient time prior to the move and in accordance with the facility standards for records storage facilities outlined in the U.S. Code of Federal Regulations.

### **Finding 2 – Issues with contract digitization within the Office of IT Schedule Programs hindered progress and wasted resources.**

#### **Lack of progress in digitizing contract files**

The IT Center has not made substantial progress in digitizing contract files, negatively affecting its readiness to move. The IT Center is scheduled to move to Central Office in May 2013, where storage space for contract files will not be available.

Despite the involvement of the IT Center in the 2010 digitization pilot, only 489 of its over 5,000<sup>2</sup> contracts have been scanned as of June 2012. The IT Center acknowledged that significant turnover in the portfolio and multiple changes to its scanning policy contributed to delays in digitizing the contract files. Further, the lack of a comprehensive plan for digitization created challenges outside the center's control. The IT Center indicated that several different plans for digitization were communicated by different components within FAS, but that there was not a consistent message. This led to the IT Center further delaying its digitization efforts in anticipation of more definitive plans being provided.

Eventually FAS realized that digitizing all contract file documents is not only time consuming and cost prohibitive, but also unnecessary. Only contract actions for the most recent option period exercised are needed for contract administration; therefore, while documents from the previous option period need to be retained, digitizing them is not necessary. The Office of Acquisition Management issued updated policy on the implementation of the electronic contract file in March 2012. This policy states that, at a maximum, acquisition centers shall only digitize information that is needed to administer the contract; the remainder of paper files can be stored at an off-center site for retrieval. Currently, the IT Center's policy is to scan the entire contract file, which is not in line with this updated policy. However, the IT Center is hesitant to change its scanning policy without a solution in place, such as a blanket purchase agreement for storage and retrieval (see *Finding 1*).

In conjunction with our suggestion for *Finding 1*, we suggest the IT Center update its scanning selection criteria to only digitize contract files in accordance with the updated policy issued by the Office of Acquisition Management.

### **Lack of progress in accepting contract files**

The IT Center's procedures did not enable contracting officers to accept digitized contract files in a timely manner, creating a backlog of work. FAS Instructional Letter 2010-07 requires contracting officers to accept the electronic contract file in ECFv no later than 90 days after the electronic file enters the quality assurance stage.

Despite this requirement, contracting officers in the IT Center had only accepted two digitized contract files as of April 2012. This lack of progress could be attributed to the IT Center's standard operating procedures, which instruct the contractor<sup>3</sup> not to send the contract files to contracting officers for acceptance. When we brought this to management's attention, they began allowing the contracting officers to accept the electronic contract files and as of June 2012 had accepted 146 contract files.

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<sup>2</sup> The IT Center recognized that scanning contracts that were in their last option period or with little or no sales was not a good use of resources. Subsequently, the IT Center implemented a scanning policy to reduce the number of contract files to scan. As of April 2012, the IT Center estimated that 3,400 contracts remain to be scanned under the new policy, although we could not verify this number.

<sup>3</sup> The IT Center awarded a task order to a contractor to perform quality assurance.

While this change in procedure will help increase the number of accepted contract files in the IT Center, there is still a backlog of digitized contract files that need to be accepted prior to the May 2013 move. This backlog is in addition to the files not yet digitized. We recognize it is a challenge for contracting officers to accept the electronic contract file as the official file of record in addition to completing their daily workload. However, we found that other acquisition centers prioritized the acceptance of digitized contract files by creating internal working groups that dedicated a specific time to accepting contract files.

We suggest the IT Center continue to make the acceptance of digitized contracts a priority and identify a process to assist the contracting officers in managing the acceptance of digitized contract files.

### **Duplication of efforts in digitization process**

The IT Center wasted resources by duplicating digitization efforts. FAS Instructional Letter 2010-07 outlines the procedures to follow as part of the digitization process. Two of these procedures are quality control and quality assurance. Quality control is the action taken to ensure that the digitized documents are clear and readable. Quality assurance is the process of validating that the electronic file accurately represents the contents of the paper file and includes steps that a contractor cannot complete.

The IT Center uses a contractor to perform quality control during the scanning process and then the contracting officers perform quality assurance after the contract file is scanned. Despite this, the IT Center awarded a task order<sup>4</sup> to another contractor to perform quality assurance. As of February 2012, the IT Center spent \$355,954 under this task order for a function that should have been completed in-house. In addition, the task order was out of scope since the underlying blanket purchase agreement does not include quality assurance and, in fact, describes this task as a function internal to the government.

While management told us that the task order was for quality control, not quality assurance, the language in the task order and the process outlined in the IT Center's standard operating procedures suggests otherwise. Nevertheless, after bringing this to management's attention, the IT Center issued a modification in June 2012 to change the language in the task order from quality assurance to quality control.

Although the IT Center modified the current task order, we remain concerned that there is a duplication of efforts between the two contractors conducting quality control. We suggest that the IT Center reevaluate its digitization needs and determine whether the current contractor functions are still necessary.

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<sup>4</sup> This task order was awarded against a blanket purchase agreement for digital management support services issued by the Assisted Acquisition Services Division within the Northeast and Caribbean Region in support of the FAS digitization effort.



### **Finding 3 – System limitations reduce the functionality of the electronic contract file.**

There are several issues with the functionality of the electronic contract file application that negatively affect the integrity of the electronic contract file as the official file of record. In accordance with Federal Acquisition Regulation 4.802(c), contract files must be maintained at organizational levels that ensure the effective documentation of contract actions and ready accessibility to principal users. However, the ECFv application does not effectively capture contract actions, and contract actions are not always readily accessible to principal users due to limitations within the ECMS system. Specifically:

- The unfiled tab in the electronic contract file is an unorganized data dump for contract documents, making it difficult to find documents within the application and placing a major burden on contracting officers. Documents that automatically migrate from internal applications populate into the unfiled tab if they are not labeled in accordance with internal guidance. In particular, this is a problem with contractor-uploaded documents as they are often improperly categorized. Due to system limitations, the contracting officer is unable to change the category prior to the documents migrating to the unfiled tab and is therefore required to move each document to the correct tab individually.
- The modification number in ECFv does not always match the modification number on the Standard Form 30,<sup>5</sup> making modifications in the electronic contract file difficult to identify. In some files, the modification number populated in ECFv is an arbitrary number assigned to that modification rather than the number assigned to the modification on the Standard Form 30.
- The electronic contract file may not include all contract actions and therefore is not complete. Documents from GSA's other internal applications do not always transfer to ECFv or are significantly delayed in migrating to ECFv.

Although FAS conducted a digitization pilot, the focus was on scanning and not on the use of an electronic contract file. We found that many contracting officers are not using the ECFv application to view the contract file, as the application does not have the functionality and ease of use of other internal applications. Ultimately, the lack of a comprehensive plan that took into consideration end-to-end electronic contracting, negatively affected contracting officers' ability to effectively use the ECFv application.

We suggest that FAS evaluate ECFv's functionality and make the application's ease of use a priority.

### **Management Comments**

In response to our report, management describes actions FAS has taken and will take to address our findings. See **Appendix C** for management comments.

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<sup>5</sup> The Standard Form 30 is the official document used to modify a contract.

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## ***Conclusion***

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FAS did not establish a comprehensive plan to digitize MAS contract files. Specifically, FAS did not assign one group to be responsible for overseeing and coordinating the digitization effort. Additionally, the IT Center has only digitized and accepted a limited number of contract files despite the impending move to Central Office. Also, due to system limitations, the electronic contract file lacks some functionality and is not easy to use.

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

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### **Purpose**

The General Services Administration's Office of Inspector General included this audit in its Fiscal Year 2012 Audit Plan.

### **Scope**

The scope of the audit is limited to reviewing the digitization efforts associated with Multiple Award Schedule (MAS) contract files within the Federal Acquisition Service (FAS).

### **Methodology**

To accomplish our objectives, we:

- Judgmentally selected the following acquisition centers for site visits:
  - National Administrative Services and Office Supplies Acquisition Center
  - Integrated Workplace Acquisition Center
  - Facilities Maintenance and Hardware Acquisition Center
  - Greater Southwest Acquisition Center
  - Management Services Center
  - Office of IT Schedule Programs;
- Randomly sampled 10 accepted contract files from each of the above acquisition centers' universe of scanned files, except the Office of IT Schedule Programs;<sup>6</sup>
- Met with selected acquisition personnel including, but not limited to, acquisition center directors, branch chiefs, contracting officers, contract specialists, and digitization project managers;
- Conducted a walk-through of scanning centers;
- Reviewed acquisition centers' processes for quality assurance;
- Compared the sampled electronic contract files in the Electronic Contract File viewer (ECFv) to the hardcopy contract files;
- Reviewed the digitization blanket purchase agreement including related task orders and standard operating procedures, where applicable;
- Reviewed criteria from the U.S. Code of Federal Regulations, Federal Acquisition Regulation, General Services Administration Acquisition Manual, National Archives and Records Administration, FAS instructional letters and other directives;
- Reviewed FAS digitization plans, presentations, and the ECFv user guide;
- Held discussions with officials from FAS's Office of Acquisition Management; Office of the Chief Information Officer; Office of Travel, Motor Vehicle and Card

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<sup>6</sup> We only reviewed two accepted contract files within the Office of IT Schedule Programs as only two contract files had been accepted at the time of our audit.

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## ***Appendix A – Purpose, Scope, and Methodology (cont.)***

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Services; Office of General Supplies and Services; and Office of Strategy Management; and

- Evaluated the implications of the 1800 F Transformation on FAS's contract file digitization effort for acquisition centers with MAS contract files in the Washington, D.C. area.

We conducted this performance audit between October 2011 and June 2012 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 digitization of MAS contract files within FAS. Thus, our evaluation of internal controls was limited to items discussed in the Results section of this report.

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## Appendix B – Digitization Process

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### **Audit**

The Audit stage is conducted to produce a list containing the name of each document in the file and note any documents that may be missing.



### **Assembly**

The Assembly stage refers to the use of the Barcode Assisted Document Indexing (BADI), which was developed in accordance with the Contract Tab Advisory Guide. Each paper document in the contract file must be identified using a BADI sheet to ensure that each document is named and filed correctly in the Electronic Contract File viewer (ECFv) after the file is sent through the scanner.



### **Scanning**

The Scanning stage is the physical action of inserting the prepared paper file into the scanner.



### **Quality Control**

Quality Control is the action that is taken to ensure that the digitized documents are clear and readable in accordance with Federal Acquisition Regulation Subpart 4.805(a).



### **Quality Assurance**

Quality Assurance (QA) is a critical stage in the digitization process. QA is the process of validating that the paper file was scanned in its entirety and that the electronic file accurately represents the contents of the paper file. The electronic contract file is not official until QA is complete and acceptance occurs.



### **Acceptance**

Acceptance is the formal action of approving the electronic contract file as the official contract file of record. This is performed in the ECFv and is executed by selecting the "accept" button. The contracting officer is responsible for ensuring that the electronic contract file is an "accurate, complete, and clear" representation of the original file. Only the contracting officer can accept an electronic contract file as the official file of record.

## Appendix C – Management Comments



GSA Federal Acquisition Service

SEP 17 2012

MEMORANDUM FOR BARBARA E. BOULDIN  
ACTING DEPUTY ASSISTANT INSPECTOR GENERAL  
FOR ACQUISITION AUDITS (JA-A)

FROM: MARY A. DAVIE *Mary Davie*  
ACTING COMMISSIONER  
FEDERAL ACQUISITION SERVICE (Q)

SUBJECT: GSA Draft Report, "Audit of the Digitization of the Federal Acquisition Service's Multiple Award Schedule Contract Files", Report #A120028

Thank you for the opportunity to provide management comments to the above report. We appreciate the Office of Inspector General's suggestions to strengthen our digitization processes and procedures. Our response describes actions we have taken, and will take, to address the findings as detailed in the attached document.

Please call me at (703) 605-5400 if you have any questions. Your staff may contact Perryn Ashmore at (571) 305-2807 or [perryn.ashmore@gsa.gov](mailto:perryn.ashmore@gsa.gov) for additional information.

cc: Lindsay Mough (JA-A)

Attachment

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Arlington, VA 20495-0008  
[www.gsa.gov](http://www.gsa.gov)

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## Appendix C – Management Comments (cont.)

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Audit of the Digitization of the Federal Acquisition Service's Multiple Award Schedule  
Contract Files  
Report Number A120028

**FAS Comments**

The Federal Acquisition Service has taken several steps to ensure the successful digitization of the Multiple Award Schedule (MAS) contract files. Our response to each finding is described below.

***Finding 1 -- Lack of a comprehensive plan***

**Planning Efforts**

Scanning efforts in FAS to complete digitization of MAS contracts began in FY10 with the establishment of the Integrated Project Team (IPT), co-sponsored by FAS Office of the Chief Information Officer (FAS CIO) and FAS Office of Acquisition Management. A comprehensive project plan was established and communicated to FAS identifying a timeline for initial scanning capabilities within the regions. Scanning sites were established across the country by FAS OCIO over the past two years while portfolio acquisition centers planned how and when they would accomplish their MAS digitization efforts.

With the decision to move FAS CO to 18th and F, oversight of digitization efforts transferred to the FAS Transformation PMO Document and Technology Track. The PMO Document and Technology Track has assumed responsibility for monitoring the scanning progress for all documents in Crystal City and Willow Wood as well as the remaining MAS contracts. The PMO will also be responsible for the final determination and processing of remaining documents that are not digitized.

MAS contract files remaining to be digitized exist in four regional offices located in GSS, TMVCS, and ITS. Each organization has a plan for completing the digitization of their individual files. Progress against these individual plans will be monitored by the FAS Transformation PMO Document and Technology Transformation Track. Success is defined by completion of scanning 100% of MAS contracts by the end of FY13. As of September 2012, FAS overall is approximately 40% complete. The status of each organization's contract scanning effort is attached.

In addition, FAS Central Office developed an inventory of all documents that need to be addressed before the move to 18th and F streets, along with an analysis of the current state and recommendations on how to move forward. Planning efforts are underway and awaiting funding. A new milestone tracking chart will be developed that aggregates data from across the FAS portfolios to establish milestones for the year.

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## Appendix C – Management Comments (cont.)

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### Contracting Initiatives

As of September 2012 two BPAs are in place to support contract digitization in FAS, but neither support storage of paper in central office or the regions. A third BPA is being developed in Region 7 that would include storage. GSA OCIO also has a general contract for scanning but does not appear to include storage nor does it include expertise on performing Quality Assurance(QA) for contract files. FAS is currently performing an analysis of these contract alternatives to determine how best to support the digitization and storage requirements that also reduces redundancy, improves consistency and reduces costs. This analysis will be completed NLT October 31, 2012 to determine the appropriate number of contracts needed to support all digitization efforts.

Aligning with the direction of the GSA Administrator and Senior Management Team, requests for future digitization tasks will be tracked through the GSA IT Spend Tracker enabling us to capture and report on planned digitization spending, as well as, ensure that requests are aligned to FAS' overall strategy for contract file digitization. We are also coordinating digitization requirements of GSA with the GSA CIO and the GSA Office of Administrative Services.

### ***Finding 2 – Issues with contract digitization within the Office of IT Schedule Programs hindered progress and wasted resources.***

The Office of IT Schedule Programs recognized the need to improve its digitization processes. The Office of IT Schedule Programs has assigned staff to provide oversight and guidance regarding contract file digitization. This guidance, which was updated in 2012, is consistent with FAS Instructional Letter 2010-07, Supplement No. 1, issued by the Office of Acquisition Management. The Office of IT Schedule Programs established criteria to identify which contract files will be digitized, what information should be indexed at either the document level or tab level, and what information shall be digitized in order to administer the contract effectively. See Attachment A for additional details.

As identified in the audit findings, the Office of the IT Schedule Programs has made the acceptance of digitized contracts a priority and has outlined a process to assist contracting officers in managing the acceptance of digitized contract files. To date, the Office of IT Schedule Programs and FAS Office of the Chief Information Officer have conducted more than a dozen training sessions which has improved the contracting staff's understanding of the acceptance process. During these training sessions, the contracting staff was provided hands-on training on the usage of the electronic contracting systems, and implementing quality assurance and acceptance of digitized contracts.

As of September 13, 2012, a total of 787 contracts were in the digitization work flow process which is a 61% increase over the 489 contracts noted on June 1, 2012. The number of contract files accepted increased by 5% from 146 to 154. The Office of the IT Schedule Programs is expected to have all its remaining 2,122 contracts digitized by May 31, 2013.



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## Appendix C – Management Comments (cont.)

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The Office of IT Schedule programs is also standardizing the manner in which contract files are organized, stored, and inventoried. The Office of the IT Schedule Programs has outlined supplementary guidance for the contracting staff to ensure compliance with the appropriate contract file inventory and retention guidelines, and will maintain central contract file locations in Arlington, VA, Ft. Worth, TX; Kansas City, MO, and Atlanta, GA.

The guidance, issued on September 13, 2012, outlines management controls to further prevent lost or misplaced files by limiting access to the hard copy contract files inventory. Controls are in place for contract file checkout enabling management and tracking of contract files and to increase the number complete contracts files that are moved through the scanning process. We believe this action will decrease the amount of rework required during the quality assurance phase of the digitization process. See Attachment B for additional detail.

The FAS CIO staff is training the Office of IT Schedule Programs contracting officers on the electronic contract file system and to manage "acceptance" of digitized contract files. To date, the FAS CIO staff has conducted more than a dozen training sessions since June 2011, either in-person or by WebEx. Training is expected to be completed by the end of fiscal year 2013.

The Office of IT Schedule Programs is consolidating contracting efforts into a single task order for the audit, assemble, scan, and quality control of the remaining 2,122 contract files across the four Schedule 70 acquisition centers. The contracting staff will continue to be responsible for performing quality assurance after the contract files are scanned.

***Finding 3 – System limitations reduce the functionality of the electronic contract file.***

As suggested, FAS will schedule an evaluation of the Electronic Contract File Viewer (ECFv) during FY 13 Q1.

The latest ECMS release (August 11, 2012) lays the groundwork to address ECFv usability issues noted by the IG. This ECMS release also lays the foundation for future ECFv enhancements to search for unawarded and pre-award offer documents and to make the ECFv user aware of the offer status (e.g., Awarded, Withdrawn, Rejected).

Other issues noted will require significant changes to our application business processes (e.g. FSS On-Line, Solicitation Writing System) to specifically address the unfiled document issue. We estimate the cost for implementation to be approximately \$4M. These requirements will be evaluated by the FAS Acquisition Systems Group (ASG) and prioritized based on available funding, risk profile, alternative solutions and other acquisition system needs.

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## Appendix C – Management Comments (cont.)

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**Attachments:**

- A - Office of the IT Schedule Programs General Image Scanning Policy
- B - Office of the IT Schedule Programs Collection Policy  
B2 -(Initial email sent to the Center and the guidance)
- C - FAS Instructional Letter 2010-07, Supplement No. 1
- D - Scan Center Stats
- E - FAS Data Management Assessment-Final Paper Count
- F - FAS Data Management Current State and Recommendations

## Appendix C – Management Comments (cont.)

Last updated 04/2012

Attachment A

Effective: 03.01.2012

### Quality Contract Selection Criteria

#### What contracts get scanned

Contract files from 1999-2009- Scan As-Is

- Tab 1-22 Scan as-is, no corrections, tab level
- Tab 23-Document level
- Tab 24-39 Scan as-is, no corrections, tab level
- Tab 40-Mod level

Contracts in the last option period (15-20 years)- Do not scan

- COR will ensure that these contracts are not in the scanning batch
- (Only contracts in year 1-15 should be scanned)

Contracts with no or low sales-Do not scan

- >less than 25,000 within the first 2 years
- >less than 100,000 within the first 5 years
- COR will ensure that these contracts are not in the scanning batch

Contracts from 2010 & higher-Scan accordingly

- Follow CTAG Q & A
- Tab 1-22-Tab level
- Tab 23-Document level
- Tab 24-39-Tab level
- Tab 40-Mod level

## Appendix C – Management Comments (cont.)

Last updated 04/2012

Attachment A

### GENERAL IMAGE SCANNING POLICY

- ALL IMAGES MUST BE SCANNED IN BLACK AND WHITE
- DO NOT SCAN CATALOGS, BROCHURES AND MARKETING MATERIAL
- ALL RESCAN ATTEMPTS MUST BE NOTATED

Description/Sample	Issue	Solution	Report as Error?
Highlights, Color Block	Some occasion, the scanners will color block the highlighted portion of a given document. Meaning the text is there but not reflecting a shaded area of highlighted text	# of Rescan attempts: 0	NO
Highlights, Darkens over text	Some occasion, the scanners will darken the highlighted portion of a given document. Meaning the highlighted text is not readable.	# of Rescan attempts: 5 Must be attempted in both B&W and Grayscale. The text behind the highlight but be legible, and shall not distort the rest of the document image.	YES, if unreadable.  NO, if # of rescanning attempts are notated
Stamps, Emblems, Logos, in B&W, darken	Some occasions, scanned images of Stamps, Emblems, Logos, etc will darken or distorted and not legible.	# of Rescan attempts: 5 Must be attempted in both B&W and Grayscale. The attempt to accurately capture stamps, emblems, and Logos shall not distort the text of the document image at anytime. Meaning, Logos, Stamps, emblems are not as important as the content of the document	NO, if # of rescanning attempts are notated
Stamps, Emblems, Logos, in COLOR	DO NOT SCAN IN COLOR. Some occasions, scanned images of Stamps, Emblems, Logos, etc will darken or	# of Rescan attempts: 5 Must be attempted in both B&W and Grayscale. The attempt to accurately capture	NO, if # of rescanning attempts are notated

## Appendix C – Management Comments (cont.)

Last updated 04/2012			Attachment A
	distorted and not legible	stamps, emblems, and Logos shall not distort the text of the document image at anytime. Meaning, Logos, Stamps, emblems are not as important as the content of the document	
Date Stamps, too Light	Some occasions, scanned images of Date Stamps will be too light or doesn't no capture image 100%	# of Rescan attempts: 5-7 Must be attempted in both B&W and Grayscale. The attempt to accurately capture date stamps shall not distort the text of the document image at anytime. Furthermore, cannot scan what's not there.	NO, if # of rescanning attempts are notated
Scanning in Color	Some occasions, the scanning Supervisor my approve a document to scan in Color in order to capture a True Image of the document, that may have some distortions in B&W	DO NOT SCAN IN COLOR AT ANYTIME	YES, if scanned in color from the date of this document
watermarks and Embedded seals	Some occasions, scanning of watermarks or embedded seals are not captured as they are impressions and do not reflect color.	# of Rescan attempts: 3 Must be attempted in Grayscale. The attempt to accurately capture watermarks and embedded seals shall not distort the text of the document image at anytime. Furthermore, DO NOT shading or marking of document to capture image. If Unsuccessful, make notation of # attempts	NO, if # of rescanning attempts are notated
Page Numbers	Some occasions, contract documents will have blank pages with a page number. For example, a 1449 may state that there are 39 pages, but Page 16, is blank except for the Page Number. The Question: In order to	The Digitization Team is authorized to make discrete markings in order to capture the Page Number	YES

## Appendix C – Management Comments (cont.)

Last updated 04/2012		Attachment A	
	scan properly, can the digitization Team mark the document to capture the page Number.		
Pictures/Images	DO NOT SCAN IN COLOR. Some occasions, scanned images and pictures will darken or become distorted.	# of Rescan attempts: 3 Must be attempted in Grayscale. The attempt to accurately capture images/pictures shall not distort the text of the document image at anytime. Meaning images/pictures are not as important as the content of the document	NO, if # of rescanning attempts are notated
Black Borders	Some occasions, Black Borders will pop on a document. The Black Borders is not an image quality issue; however it may be viewability issue. Meaning, that the Black and White Borders, will be less the 100% viewability. The CO/CS can always zoom the document to read the content.	# of Rescan attempts: 1  Again a CO/CS can use the zoom feature if not 100%	NO, if # of rescanning attempts are notated
Sticky notes, taped papers,	When dealing with Difficult To Scan documents (sticky notes, taped papers) one technique that is used is to make a copy of the document and substitute it during the scanning process. After the scan is done the DTS document is replaced with the original. The question is - should we keep the copied version and add it to the Do Not Scan contents or discard it?	Discard it. It is not a part of the original file. It's a solution for a unique situation.	n/a
Dun and Bradstreet	D&B's comes with many colors and shading that make it difficult to scan a true	# of Rescan attempts: 3 Must be attempted in Grayscale first. The attempt	

## Appendix C – Management Comments (cont.)

Last updated 04/2012		Attachment A	
	image without distorting the text of the document	to accurately capture images/pictures shall not distort the text of the document image at anytime. Meaning images/pictures are not as important as the content of the document	
Oversized document/catalogs	Documents are too big to scan.	See COR for a signed waiver excluding those documents, and put a note in the file-to see hardcopy version	
Contracts with no sales or low sales. Contracts on last option period.	Contracts may be overlooked that may not need to be scanned.	Do not scan; COR will ensure that these contracts are not in the scanning batch (Only contracts in year 1-15 should be scanned)	
Award docs with no date, signature or contract #		Need to be shown to COR Agency/company will provide solution as to how to file.	
Combined scanning		Documents under tab 14 thru 22 can be BADI at the tab level not document level.	
		Documents under tab 23 and 40 can be BADI at the document level and not the tab level.	
		Documents between 24 thru 39 can be BADI at the tab level.	

## Appendix C – Management Comments (cont.)

Attachment B

### Central Contract File Location, Inventory/Digitization and Retention Guidance

#### Purpose

The purpose of this memorandum is to provide supplementary guidance to the contracting staff to ensure the Center for IT Schedule Programs adhere to and comply with the appropriate contract file inventory and retention guidelines. The Center for IT Schedule Programs shall maintain central contract file locations in Arlington, VA, Ft. Worth, TX; Kansas City, MO, and Atlanta, GA, and standardize the manner which contract files are organized, stored, and inventoried. As a result of this guidance, the Center for IT Schedule Programs will ensure proper management and tracking of contract files.

#### Applicable Regulations

In addition to this memorandum, the Center for IT Schedule Programs shall adhere to the rules and regulations listed below:

1. FAR 4.8 Government Contract Files
2. GSAM 504.8, Government Contract File

#### Inventory Procedures

All active Schedule contract files ("ZF" for Schedule 70 and "BF" for Consolidated MAS contracts) in hard copy format will be collected and provided to a designated point of contact for storage in a central file location. In order to maintain proper tracking, please ensure that all contract files and their accompanying folders are clearly marked with the 1) contractor's name, 2) MAS contract number, and 3) volume or part (i.e. Part 1 of 5 or Volume 3 of 3). The intent of the process is to ensure the the Center for IT Schedule Programs collect and inventory all of its hard copy contract files in a central filing locations. Each branch in the Center for IT Schedule Programs will be designated a time period for file collection,, which is outlined below.

#### Designated Points of Contacts (POC) and Locations

1) Arlington, VA; Central Office

Designated POC: Lisa Williams

Alternate/Contract Closeout: Walter Herald

Collection Location: Various locations per Branch

Storage Location: L108

2) Atlanta, GA; Region 4

POC: Leah Adams

Collection Location: within the current office space

Storage Location: file cabinets within the current office space



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## Appendix C – Management Comments (cont.)

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Attachment B

3) Kansas City, MO; Region 6

POC: Donald Beaudet

Collection Location: Room 14A02

Storage Location: Room 14A02

4) Ft. Worth, TX; Region 7

POC: Tara Wetli

Collection Location: within the office space

Storage Location: File location within the office space

### Milestone Collection Schedule

The CS/CO will be able to drop-off or return contracts files for inventory from Tuesday -Thursday 9am-12pm to the respective designated locations. Contract file collection for the branches shall occur on the following dates:

(QTFABA) Deborah McCray- File collection completed

(QTFABB) Yvonne Jones (vacant)--September 10- 28, 2012

(QTFAAA) Patricia Duncan --September 10-28, 2012

QTFAAB) Sheredia Brown--September 10-28, 2012

(QTF AAC) Diane Taylor--September 10-28, 2012

(QTF AAD) Angela Jones--September 10-28, 2012

September 28, 2012: Complete Inventory Collection for Crystal City location

### File Check Out and Drop Off

To access to the hard contract files inventory will be managed prevent losses or misplacement. In order to check out contract files, the requestor shall send an email to the designated POC listed. Each request shall include the contract number, volume or folder (if applicable) and the reason for the check out. Once received, the designated POC will acknowledge and provide the requestor with the contract file. Once the CO/CS is ready to return, they shall contact the designated POC for pick up and drop off the contract at the designation location. The CO/CS will be allowed to only check out three (3) contract files at a time.

### Contract Closeout

All hard copy contracts that are expired, terminated or have been cancelled shall be provided to Walter Herald for retention preparation. Currently, due to the lack of space to house the inactive, we ask you to first check with Walter Herald to schedule shipment of the contract files. He can be reached at

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**Appendix C – Management Comments (cont.)**


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Attachment B

**walter.herald@gsa.gov**

## Appendix C – Management Comments (cont.)

9/13/12 GSA.gov Mail - Collection Policy of Contract Files: Effective September 10 - 28, 2012 CORRECTION Attachment B2

 Dennis Harrison (QTFAC) <dennis.harrison@gsa.gov>

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**Collection Policy of Contract Files: Effective September 10 - 28, 2012  
CORRECTION**

1 message

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Carmen Calloway (QTFAC) <carmen.calloway@gsa.gov> Thu, Sep 13, 2012 at 12:19 PM  
To: Warren Blankenship <warren.blankenship@gsa.gov>, Cheryl Harris <cheryl.harris@gsa.gov>, "Jill Thomas (QTFAD)" <jill.thomas@gsa.gov>, "Jane Scroggins (QTFADA)" <jane.scroggins@gsa.gov>, "Cathy Nelson (QTFADB)" <cathy.nelson@gsa.gov>, Sandra Upson <sandra.upson@gsa.gov>, "Diane Taylor (QTF AAC)" <diane.taylor@gsa.gov>, Patricia Duncan <patricia.duncan@gsa.gov>, "Angela Jones (QTF AAD)" <angela.jones@gsa.gov>, Sheredia Brown <sheredia.brown@gsa.gov>, Deborah McCray <deborah.mccray@gsa.gov>, Regina Ellis <regina.ellis@gsa.gov>, "Joyce Taylor (QTFABB)" <Joyce.Taylor@gsa.gov>, "Christine Stewart (QTF AAD)" <Christine.Stewart@gsa.gov>, Jacquelin Draughn <jacquelin.draughn@gsa.gov>, "Mona Settle (QTF AAA)" <Mona.Settle@gsa.gov>, "Relinda Brown (QTF AAA)" <Relinda.Brown@gsa.gov>, Cheryl Thornton <cheryl.thornton@gsa.gov>, "Cornelius Cooper (QTF AAC)" <cornelius.cooper@gsa.gov>  
Cc: "Dennis Harrison (QTFAC)" <dennis.harrison@gsa.gov>

All

An update has been made to this memo.

On Thu, Sep 13, 2012 at 10:50 AM, Carmen Calloway (QTFAC) <carmen.calloway@gsa.gov> wrote:  
All

The purpose of this memorandum is to provide supplementary guidance to the contracting staff to ensure the Center for IT Schedule Programs adhere to and comply with the appropriate contract file inventory and retention guidelines. The Center for IT Schedule Programs shall maintain a central contract file location in Arlington, VA, Ft. Worth, TX, Kansas City, MO, and Atlanta, GA, and standardize the manner which contract files are organized, stored, and inventoried. As a result of this guidance, the Center for IT Schedule Programs will ensure proper management and tracking of contract files.

Please pass this information to your staff.

--  
Thanks

Carmen Calloway  
Contract Price/ Cost Analyst, Office of Acquisition Operations (QTFAC)  
IT Schedules Center  
Federal Acquisition Service  
Phone: 703-605-3450  
Email: carmen.calloway@gsa.gov

<https://mail.google.com/mail/u/0/?ui=2&ik=ee5488837fbvlew=pt&search=inbox&th=139c06e0f5732144>

## Appendix C – Management Comments (cont.)

9/13/12 GSA.gov Mail - Collection Policy of Contract Files: Effective September 10 - 28, 2012 CORRECTION

Attachment B2

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Thanks


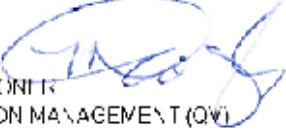
Carmen Calloway  
Contract Price/ Cost Analyst, Office of Acquisition Operations (QTFAC)  
IT Schedules Center  
Federal Acquisition Service  
Phone: 703-605-3450  
Email: [carmen.calloway@gsa.gov](mailto:carmen.calloway@gsa.gov)

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 CollectionPolicySeptember2012.pdf  
66K

<https://mail.google.com/mail/u/0/?ui=2&ik=ee6488837f9vlew=pt&search=Inbox&th=139c06e0f5732144>

## Appendix C – Management Comments (cont.)

9/13/12	Instruction Letter (IL) 2010-07 Supplement No. 1	Attachment C
	GSA Federal Acquisition Service	
March 23, 2012		
<b>FAS INSTRUCTIONAL LETTER 2010-07</b> <b>Supplement No. 1</b>		
<b>MEMORANDUM FOR ALL FAS ACQUISITION ACTIVITIES</b>		
FROM:	HOUSTON W. TAYLOR ASSISTANT COMMISSIONER OFFICE OF ACQUISITION MANAGEMENT (QAM)	
SUBJECT:	Implementation of the Electronic Contract File (ECF)	
1. <b>Purpose:</b>	The purpose of this Instructional Letter (IL) supplement is to update information and guidance on the digitization of paper Federal Acquisition Service (FAS) contract files for purposes of executing the digitization process, as well as the Electronic Contract File (ECF) application.	
	This supplement also implements ECF for the remainder of the GSA Federal Supply Schedules (FSS). An additional supplement will be issued specifically addressing contract types other than FSS.	
2. <b>Background:</b>	On May 20, 2010, FAS received a class deviation and clause revisions to mandate eOffer and eMod. As of October 2011, all GSA Schedules <sup>1</sup> adopted these clauses and mandated that all submissions of FSS offers and modifications be received electronically. In addition, <a href="#">IL 2010-07, Implementation of a Pilot for the Electronic Contract File (ECF)</a> requires all paper that is received or generated internally to be digitized. Therefore, all FSS files from October 2011 forward should be electronic.	
	However, efforts to digitize paper files generated prior to October 2011 have not proceeded as quickly and cheaply as anticipated. Common challenges include the hesitation to work with a hybrid contract file <sup>2</sup> , reluctance to accept the electronic contract file as the official file of record, and the time and costs associated with the physical scanning of contract files.	
3. <b>Effective Date:</b>	Date of signature.	
4. <b>Termination Date:</b>	This is effective until cancelled or incorporated into a handbook.	
5. <b>Applicability:</b>	This IL applies to all FAS activities awarding and administering FSS contracts. This IL does not apply to the Department of Veteran's Affairs activities awarding and administering FSS contracts.	
6. <b>Reference Regulations:</b>	This IL references the following policy and regulations:	
	<a href="https://apps.fas.gsa.gov/newclausemanual/manual/content.cfm?pageName=IL_2010-07_Supplement.h...">https://apps.fas.gsa.gov/newclausemanual/manual/content.cfm?pageName=IL_2010-07_Supplement.h...</a>	

## Appendix C – Management Comments (cont.)

9/13/12

Instruction Letter (IL) 2010-07 Supplement No. 1

Attachment C

- FAR Subpart 4.8, Government Contract Files
- FAR Subpart 4.5, Electronic Commerce in Contracting
- FAR Subpart 4.7, Contractor Records Retention
- GSAM Subpart 504.8, Government Contract File
- [IL 2008-02, Multiple Award Schedules \(MAS\) Program: Modification Receipt Dates and Types.](#)
- [IL 2010-07, Implementation of a Pilot for the Electronic Contract File \(ECF\).](#)
- [IL 2010-09, Mandating the Electronic Submission of Offers and Modifications for the Federal Supply Schedules Program.](#)
- [IL 2011-19, Defining an Official Contract File for FAS Acquisition Programs When Operating in a Paper and Electronic Environment.](#)

### 7. Instructions/Procedures.

#### A. Pilot Program.

The pilot program has concluded. This supplement requires full scale implementation of the digitization initiative to all GSA Schedules. The implementation shall use the same procedures outlined in [IL 2010-07, Implementation of a Pilot for the Electronic Contract File \(ECF\)](#), with the exceptions detailed in this supplement below.

#### B. Streamlined Acceptance Process.

This supplement updates [IL 2010-07, Implementation of a Pilot for the Electronic Contract File \(ECF\)](#) Section (7)(D)(vi), Acceptance, as follows:

##### Acceptance

Acceptance refers to the formal action of approving the electronic contract file as the official contract file of record. Acceptance is performed in the ECF following Quality Assurance (QA) and is executed by selecting the "accept" button.

- 1) Only the CO can accept an electronic contract file as the official file of record.
- 2) The CO is responsible for ensuring that the electronic contract file is an "accurate, complete, and clear" representation of the original file. However, the CO should rely on the Quality Assurance (QA) report provided, and only sample the critical portions of the contract file, as determined by the CO.
- 3) The CO accepting the file is not responsible for contract actions completed by previous COs. Therefore, the CO should not go back to "correct" contract actions.
- 4) Acceptance must take place no later than 90 days after the electronic file enters the QA stage.

#### C. Each acquisition center shall establish a natural cut off point at which the digitization is

[https://apps.fas.gsa.gov/newclausemanual/manual/content.cfm?pageName=IL\\_2010-07\\_Supplement.h...](https://apps.fas.gsa.gov/newclausemanual/manual/content.cfm?pageName=IL_2010-07_Supplement.h...)

## Appendix C – Management Comments (cont.)

9/13/12

Instruction Letter (IL) 2010-07 Supplement No. 1

Attachment C  
required for paper files. At the maximum, acquisition centers shall only digitize the information that is needed to administer the contract (i.e. only scan contract actions executed since the last option period of the contract was exercised). The remainder of the paper files may be stored at an off-site location for retrieval, if necessary.

### D. Storing the remainder of paper files.

This supplement deletes IL 2010-07, Implementation of a Pilot for the Electronic Contract File (ECF) Section 7(E), Retention and Disposition:

~~"Since contract files digitized during the pilot do not constitute official contract files of record, paper contract files must be retained and will continue to serve as the official file of record. Like today, documents that are submitted in eOffer and/or eMod do not need to be printed and will be considered part of the official contract file."~~

Each acquisition center shall determine which files will be stored.

### E. Contract Close Out

The Administrative Contracting Officer shall send the final evaluation of contractor performance, indicating all FSS sales have been reported, to the paper storage facility in addition to the Procurement Contracting Office (PCO). Upon receipt of this memo from the ACO, all paper files kept in storage shall be sent to National Archives and Records Administration (NARA). Concurrently, the PCO shall close out contract file, placing all documentation in tab 42 of the electronic contract file.

<sup>1</sup> This is only applicable to GSA-administered Schedules. Currently, Schedules administered by the VA do not accept eOffer/eMod.

<sup>2</sup> FAR 4.802(f) states that "agencies may retain contract files in any medium (paper, electronic, microfilm, etc.) or any combination of media, as long as the requirements of this subpart are satisfied."

Author: Nicholas West

## Appendix C – Management Comments (cont.)

Attachment D

Region	Scanning Center	Scanning Equipment	Total Scans	MAS Contracts left to Scan	Projected Completion Date for MAS Scans	Notes
R2	New York	(4) Fujitsu F-9000C Scanners	1,577,329	-	Completed	1649 MAS Contract Scanning Completed
R3	Philadelphia	None	N/A	N/A	N/A	R3 using Crystal City for Scanning
R6	Kansas City	(6) Canon DR-9000C Scanners	12,299,437	460	9/6/2013	3 new Fujitsu Scanners ordered approved in IT Tracker 9/10/2012
R7	Fort Worth	(3) Fujitsu F-9000 Scanners	1,489,932	729*	9/30/2013	
R10	Seattle	(2) Fujitsu F-9000C Scanners	4,315,041	900	TBD	
		(2) Canon DR-9000C Scanners	24,242,855	900	5/6/12/013	2 Fujitsu Scanners ordered approved in IT Tracker 9/10/2012
TMACS	Crystal City	(1) Fujitsu F-9000C Scanners	Not begun	915	5/6/12/013	
West Star	Swiring	(1) Fujitsu F-9000C Scanners	2,016,133	N/A	N/A	Testing Environment
		(2) Canon DR-9000C Scanners				

\*Includes 174 Contracts sent from Atlanta ITS site to Ft. Worth for scanning  
 Also doing a major conversion effort of Region 7 Image Now Files to Documentum Platform  
 Completed 1651 conversions out of a total of 4500



# Appendix C – Management Comments (cont.)

Attachment E

PAPER FILES - RETENTION

Name of Office	RECYCLE ESTIMATE	SCAN ESTIMATE	BOX / ARCHIVE ESTIMATE	MOVE TO 185&F ESTIMATE	Comments and Notes
<b>Office of Administration (QA)</b>	0.5	0	0	0	
Human Capital Management Division (QA08)	21	1	6	15	
Mobile Management Division (QA0C)	0	0	9	0	
FAS 1800 Transition (QA0E)	0	0	0	0	
<b>Office of Acquisition Management (QV)</b>					
Management Support Staff	22	45	9	9	06 of the 9 boxes to be archive are expired contract files
Acquisition Career Management Division	8	35	0	0	
Supplier Management Division	25	8.25	2	1	
M&S Program Division	58	31	0	0	2 of 6 boxes to be moved are marketing materials that require space
Policy Implementation Division	15	5	1	0.5	6 of 6 boxes are current year, wait to file at end of each calendar year
Socio-economic Program Division	0	1	0	0	
Program Analysis Division	6.5	16.5	0	0	
<b>Office of Assisted Acquisition Services (JAS)</b>					
Business and Acquisitions Operations Division	0	0	0	0	8 Would like to have one 4 drawer filing cabinet for misc materials for M&S
<b>Center for FEOGMA</b>					
Center for FEOGMA	28.5	5	0	0	98 were all closed out. At that point, they could be boxed and archived.
<b>Office of the Chief Information Officer (CIO)</b>					
Applied Engineering Division	0	0	0	0	NOTE: There were 12 filing cabinets discovered that were OOD materials (after their assessment during the Acquisition Management assessment. The POC, Tricia White, was notified to ascertain contents and status. Still pending response.
Asset and Transportation Management Division	0	0	0	0	
Planning and Architecture Division	0	0	0	0	Kathy Gahl and Nancy Holcomb have old contracting files. They were not sure how much was electronic and which files could be recycled or archived.
Contract Services Management Division	0	0	0	0	
Contract Administration Division	0	0	0	0	
Information Systems Security Division	0	0	0	0	
Business Intelligence and Enterprise Wide Information Management Division	0	0	0	0	
<b>Office of the Controller (QA)</b>					
Business Analytics and Consulting and Audits and Controls Division	16	0	3	0	
	29	0	5	1	

# Appendix C – Management Comments (cont.)

Attachment E						
PAPER FILES - RETENTION						
Systems Division	0	0	0	0	0	0
Budget Division	23.75	0.5	4	2	2	2
Financial Operations Division (W Blaw Wood)	0	0	216			This Branch Chief would like to box/archive all of these financial files and archive for 30 years from the date of boxing them. This is because many of the project files are not closed and are not electronic (2006-1985) and she would like to ensure to full file retention.
Office of the Customer Accounts and Research (CA) - (OC)	2	4	10			Primarily contracting files that are inactive and active paper files that can be archived.
Customer Analysis and Research Division	0	5	0	0	25	Boxes to move to 28th and file active project files used by the staff.
Customer Outreach Division	25	1	0	1	1	
Customer Relationship Management Division	0	0	0	0	0	
Office of Integrated Technology Services (ITS) - (OT)	2	0.25	1	0	0	
Management and Program Support Division	9	0	0	0	15	Much of what is being moved is related to the security materials. These numbers DO NOT include the boxes boxed up by NARA in their file room. These numbers only include the file cabinets and bookshelves in their offices.
Office of Acquisition Operations	22	44	113			Also, if they organized shared drive, may not need to scan all files in an identified.
Office of IT Schedule (OTF) - Crystal City	5	71.25	2	2	19	The attached files to be scanned are all considered active contracting files in the common filing cabinets. The number could be decreased as it appears some of the files could be closed or inactive and may not need to be scanned. However, personnel were not available to make this determination. This count does not take into consideration the 1st floor file storage room and the DOJ file storage room which were not included in the assessment. These two areas have been assessed prior and details provided to the OCO office.
Office of Network Services Programs	52	0	27	1	1	
Office of Planning and Portfolio Management	27.5	5	3	1	2	
Office of Strategic Programs	0	4	0	0	10	
Office of General Supplies and Services (GSS) (OS)	4.5	3.5	2	0	0	
Enterprise Supply Chain Solutions	0	0	0	0	0	
Office of Personal Property Management	18	47	7	2	2	38 of the 85 boxes to be scanned will be done under the National Scanning Contract and not locally. The number listed here is the amount identified that still needs to be scanned. Once data is scanned in there it could be moved/shredded.
Business Management Office (GSA, QASBC, and QASB)	35	3	0	0	0	
Office of Acquisition Operations	66.5	99.5	61	0	0	
Office of Supply Operations	100.75	96.25	37	3.75	3.75	This Division initially had a lot of data marked to be scanned AND archived in the initial assessment in doing the final count that was adjusted based that once that data was scanned it was not needed in paper format.

# Appendix C – Management Comments (cont.)

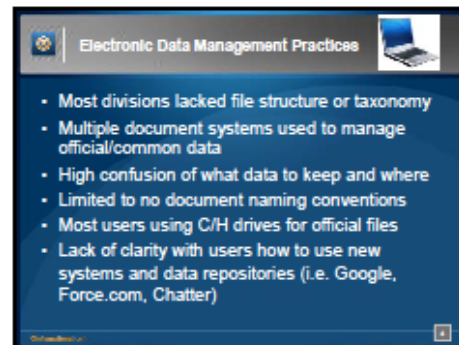
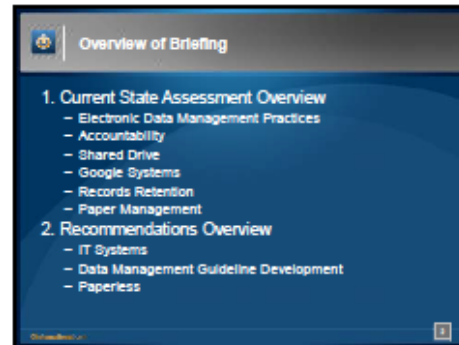
## Attachment E

### PAPER FILES - RETENTION

Office of Travel, Motor Vehicles and Card Services (TMVCS) - (GM)	875	7	3	This Office has a lot of contract files. Need to determine close out date with many of the files to determine retention. Also need to determine "scanning" criteria if closed, inactive, cancelled, and expired contracts need to be scanned in.
Office of Acquisition Operations	52.5	2335	198	This Division initially had a lot of data marked to be scanned AND archived in the initial assessment. In doing the final count that was adjusted based that once that data was scanned it was not needed to archive in paper format. Also need to determine "scanning" criteria if closed, inactive, cancelled, and expired contracts need to be scanned in.
Office of Charge Card Management	56.5	45	3	
Office of Travel and Transportation Services	198.5	10.25	688.5	This Office has a lot of contract files. Need to determine close out date with many of the files to determine retention for archiving.
Office of Motor Vehicle Management	77.5	1	8	18
Committee				
Office of Strategic Management (OSM)	1.5	32.25	2	The paper assessment was done as a whole office and not by Division. 26 of the 32.25 files that were to be scanned could be archived if the files could be guaranteed a less than 48 hour retrieval. If cannot guarantee, files will have to be scanned for easy access.
Continuous Process Improvement Division	0	0	0	
Strategic Planning and Performance Management Division	0	0	0	
Strategic Communications and Congressional Liaison Division	0	0	0	
<b>TOTALS PER STANDARD FILE BOXES</b>	<b>1,228</b>	<b>1,463</b>	<b>1,463</b>	<b>237</b>
Estimate of Pages (2500 per file box)	3,069,375	3,657,500	3,656,250	
Original Estimate of Pages by FAS December 2011	1,500,000	5,000,000	3,500,000	0

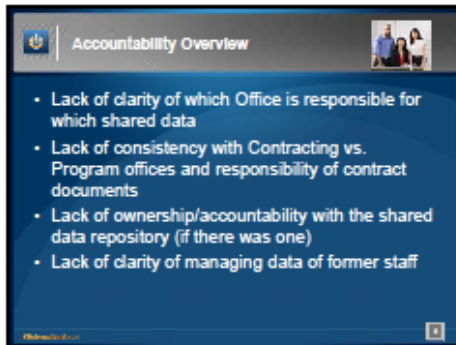
## Appendix C – Management Comments (cont.)

Attachment F



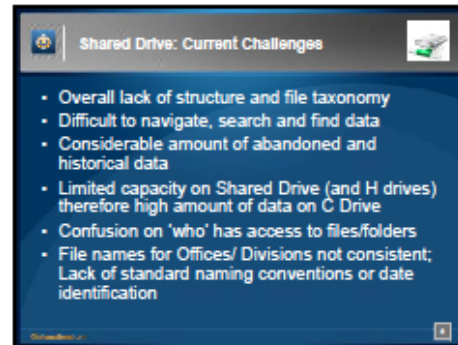
## Appendix C – Management Comments (cont.)

Attachment F



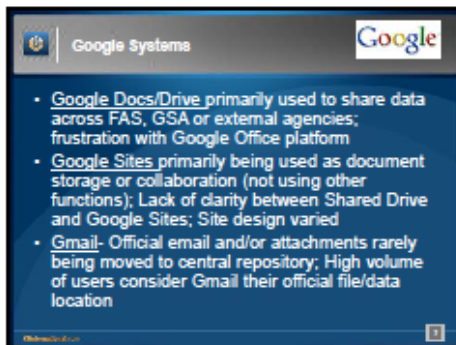
**Accountability Overview**

- Lack of clarity of which Office is responsible for which shared data
- Lack of consistency with Contracting vs. Program offices and responsibility of contract documents
- Lack of ownership/accountability with the shared data repository (if there was one)
- Lack of clarity of managing data of former staff



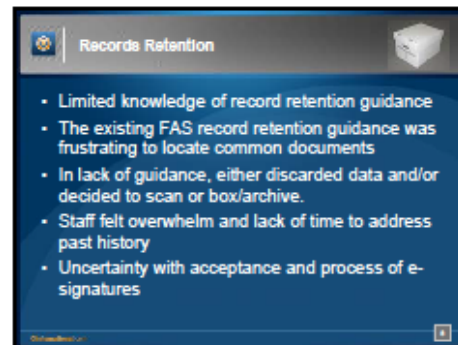
**Shared Drive: Current Challenges**

- Overall lack of structure and file taxonomy
- Difficult to navigate, search and find data
- Considerable amount of abandoned and historical data
- Limited capacity on Shared Drive (and H drives) therefore high amount of data on C Drive
- Confusion on 'who' has access to files/folders
- File names for Offices/ Divisions not consistent; Lack of standard naming conventions or date identification



**Google Systems**

- Google Docs/Drive primarily used to share data across FAS, GSA or external agencies; frustration with Google Office platform
- Google Sites primarily being used as document storage or collaboration (not using other functions); Lack of clarity between Shared Drive and Google Sites; Site design varied
- Gmail- Official email and/or attachments rarely being moved to central repository; High volume of users consider Gmail their official file/data location



**Records Retention**

- Limited knowledge of record retention guidance
- The existing FAS record retention guidance was frustrating to locate common documents
- In lack of guidance, either discarded data and/or decided to scan or box/archive.
- Staff felt overwhelm and lack of time to address past history
- Uncertainty with acceptance and process of e-signatures

## Appendix C – Management Comments (cont.)

Attachment F

**Paper Management: Overview**

- Official paper records ended 2006-2008 (non-acquisition). No central repository for official electronic files for same records.
- Official paper records maintained for acquisition records. Most contracting offices did not have central electronic repository.
- Issues cited with contracting personnel for being paperless in new environment

**Common Filing Cabinet Count**

- Non-acquisition Offices: minimal paper
- Acquisition Offices: High volume of paper
- Common Filing Cabinet Tally
  - Scan= 1463 standard bankers boxes
  - Box/Archive= 1463 standard bankers boxes
  - 18" & F= 237 standard bankers boxes
  - Recycle/Shred= 1228 standard bankers boxes

*See Excel worksheet "FAS Data Mgmt Assessment\_Final Paper Count"*

**Digitizing Paper: Reasons Printing**

Reasons for Paper Printing

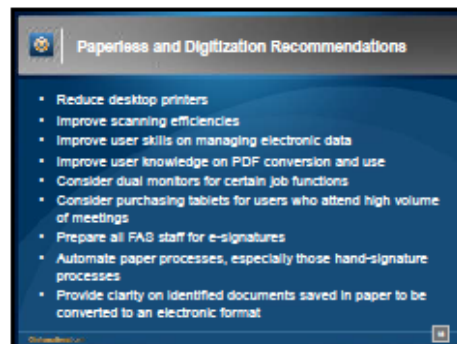
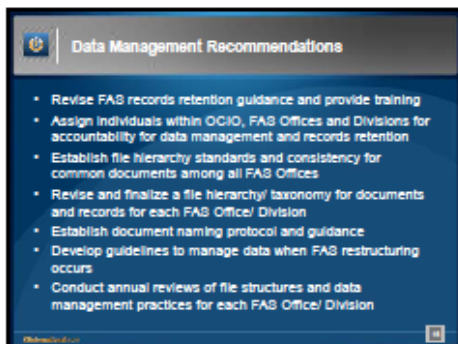
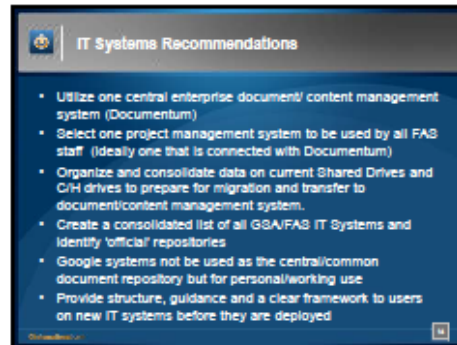
- To read/review
- Meeting materials
- Quick reference
- Data processing
- Habits

**Digitizing Paper: Current Challenges**

- Electronic signatures issues/ concerns
- Lack of understanding of how to use Nuance PDF functions
- Fears of storing data electronically (getting 'lost')
- Records not received electronically (e.g. handwritten signatures, vendor bid/proposals)
- Frustration with office scanners; too time consuming, in-efficiencies with scan process

## Appendix C – Management Comments (cont.)

Attachment F

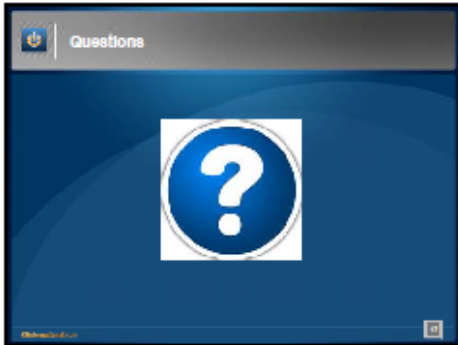


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## Appendix C – Management Comments (cont.)

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Attachment F



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## ***Appendix D – Report Distribution***

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Acting Commissioner, Federal Acquisition Service (Q)

Deputy Commissioner, Federal Acquisition Service (Q1)

Chief of Staff, Federal Acquisition Service (Q0A)

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

Director, Business Analytics and Consulting Division (QB0A)

Assistant IG for Auditing (JA)

Deputy Assistant IG for Investigations (JID)

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