



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

FAS Needs to Strengthen its Training and Warranting Programs for Contracting Officers

*Report Number A140008/Q/9/P15002
June 26, 2015*



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

REPORT ABSTRACT

OBJECTIVE

To determine if the Federal Acquisition Service's (FAS's) method and oversight of training and warranting contracting officers is relevant and effective in developing the acquisition workforce, in accordance with GSA's policies and mission.

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FAS Needs to Strengthen its Training and Warranting Programs for Contracting Officers

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WHAT WE FOUND

We identified the following during our audit:

Finding 1 – Specialized training is needed for contracting officers awarding and administering Multiple Award Schedule contracts.

Finding 2 – Contracting officers are taking non acquisition-related courses to maintain their warrants.

Finding 3 – Contracting officers are faced with limited, live instructor-led training options.

Finding 4 – Training coordinators in Central Office are limited in their ability to track the training requirements of contracting officers within the Federal Acquisition Institute Training Application System.

Finding 5 – The database used to track warrant and Federal Acquisition Certification in Contracting information for FAS contracting officers is not current or accurate.

WHAT WE RECOMMEND

Based on our audit findings, we recommend that the FAS Commissioner:

1. Provide specialized training for contracting officers who award and administer Multiple Award Schedule contracts that includes course FCN 401, *Awarding and Administering Multiple Award Schedules*.
2. Ensure all continuous learning supports the competencies associated with the Federal Acquisition Certification in Contracting certification.
3. Encourage the use of acquisition training budgets to procure more live instructor-led training courses, to better develop and engage the acquisition workforce.
4. Grant Central Office portfolio training coordinators system access to generate reports in the Federal Acquisition Institute Training Application System that track Federal Acquisition Certification in Contracting and warrant compliance for their assigned staff.
5. Ensure all warrant information is current and accurate in the Federal Acquisition Institute Training Application System warrant module.
6. Establish a process whereby Bureau Certification Managers and/or training coordinators routinely validate warrant information in the Federal Acquisition Institute Training Application System.

MANAGEMENT COMMENTS


The FAS Commissioner agreed with our findings and recommendations. Management comments are included in their entirety as **Appendix C**.



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

DATE: June 26, 2015

TO: Thomas A. Sharpe
Commissioner, Federal Acquisition Service (Q)



FROM: James B. Draxler
Audit Manager, Pacific Rim Regional Audit Office (JA-9)

SUBJECT: FAS Needs to Strengthen its Training and Warranting Program for Contracting Officers
Report Number A140008/Q/9/P15002

This report presents the results of our audit of FAS's method of training and warranting contracting officers. 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 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:

| | | | |
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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

Federal Acquisition Service (FAS) contracting officers play an integral role in delivering best value in procuring products and services for the government.¹ They are responsible for ensuring that the government's interests are protected and procurements comply with the Federal Acquisition Regulation (FAR) and GSA guidance while providing solutions to GSA customers; which include:

- Managing more than 17,000 Multiple Award Schedule (schedule) contracts, which generated over \$34.8 billion in sales to customer agencies during fiscal year (FY) 2013;
- Administering GSA's Alliant Governmentwide Acquisition Contract, which is used by 46 federal agencies to award \$13.2 billion over the past 4 years; and
- Procuring \$1.3 billion of information technology, network, and professional service solutions through the Federal Systems Integration and Management Center, during FY 2013.

The need to train contracting officers is well documented and critical to achieving the best value for GSA's customer agencies and ultimately, the American taxpayer. To address this training need, the Office of Federal Procurement Policy issued Policy Letter 05-01 (dated April 15, 2005) to align the training, education, and experience requirements of civilian agency acquisition personnel with that of the defense acquisition workforce. Policy Letter 05-01 requires personnel issued new contracting officer warrants after January 1, 2007, be certified at the appropriate Federal Acquisition Certification in Contracting (FAC-C) level I, II, or III. The curriculum for the training classes required for FAC-C is developed by the Federal Acquisition Institute and is consistent across all civilian agencies. GSA issued Acquisition Letter V 06-06, dated October 24, 2006, to outline its training, education, and experience requirements under the Contracting Officer Warrant Program (warrant program).² GSA's warrant program requires all personnel under the GS-1102 contracting job series to have a FAC-C level that corresponds to their warrant level.³ Furthermore, the Head of Contracting Activity for each service, region, or zone is responsible for issuing warrant authority to contracting officers approved by their respective Contracting Officer Warrant Board (warrant board).⁴

¹ Contracting officers, for the purposes of our audit, are defined as contracting personnel that are issued a warrant.

² Acquisition Letter V 06-06 is derived from General Services Administration Acquisition Manual 501.6 – Career Development, Contracting Authority, and Responsibilities.

³ GSA warrants are defined as Certificates of Appointment that authorize the contracting officer to purchase products and/or services at the basic, simplified acquisition, intermediate, or senior level (also known as unlimited). Basic and simplified acquisition warrants require a FAC-C level I, intermediate warrants require a FAC-C level II, and senior warrants require a FAC-C level III.

⁴ Each Head of Contracting Activity can structure the warrant board at their discretion; however, the warrant board is defined as a group of senior level acquisition employees who receive, evaluate, and process requests for selection and nomination of a contracting officer.

FAS's oversight of its training and warranting of contracting officers is decentralized by region and by contracting portfolio.⁵ Regional Bureau Certification Managers are responsible for ensuring compliance with the warrant program for their regional reporting contracting officers.⁶ Conversely, Central Office contracting officers have their warrant requirements tracked by the Acquisition Career Management Division under the Office of Acquisition Management. FAS Regional Commissioners and the Assistant Commissioner of the Office of Acquisition Management serve as the FAS Heads of Contracting Activity under delegation from the Senior Procurement Executive and FAS Commissioner. As for the decentralized training process, regional personnel assist the Bureau Certification Managers in developing and executing training programs specific to the procurements of the region. Similarly, training coordinators in Central Office develop training programs specific to the procurements of each contracting portfolio.

Objective

To determine if FAS's method and oversight of training and warranting contracting officers is relevant and effective in developing the acquisition workforce, in accordance with GSA's policies and mission.

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

⁵ Contracting portfolio refers to the four revenue generating offices under FAS: Assisted Acquisition Services; Travel Motor Vehicles, & Card Services; General Supplies and Services; and Integrated Technology Services.

⁶ For purposes of this audit, regional reporting contracting officers are defined as contracting officers that have their warrant requirements tracked by the regional Bureau Certification Managers.

Results

Finding 1 – Specialized training is needed for contracting officers awarding and administering Multiple Award Schedule contracts.

Contracting officers who administer and award schedule contracts are not receiving specialized training necessary to perform their jobs. These contracting officers represent half of the 540 FAS contracting officers (see **Appendix B**).⁷ The limited availability of schedule-related training puts the government at an increased risk that schedule contracts may be improperly awarded and/or administered.

A well-qualified and trained acquisition workforce is critical to GSA achieving its mission. However, review of the required FAC-C curriculum and GSA course offerings showed that schedule-related training is directed toward customers purchasing from schedule contracts, not contracting officers awarding or administering schedule contracts.

- Course descriptions of the eight courses required for contracting officers under FAS Instructional Letter 2012-10 indicate the courses are intended for customers using schedule contracts.
- Interviews with contracting officers disclosed that the FAC-C curriculum does not adequately address awarding and administering schedule contracts training because schedule contracts are GSA-specific contract vehicles. Since the FAC-C curriculum focuses on training needs for all federal acquisition employees, it does not specifically address training for GSA schedule contracts. Contracting officers indicated a need for more specialized training in this area.

The Multiple Award Schedule Program Division under the Office of Acquisition Management is finalizing course FCN 401, *Awarding and Administering Multiple Award Schedules*. The objective of the course is to provide instruction on awarding and administering schedule contracts. The course was deemed applicable and effective by contracting officers who attended the pilot course. FAS should incorporate FCN 401 into the training curriculum for its contracting officers.

Recommendation 1

1. Provide specialized training for contracting officers who award and administer Multiple Award Schedule contracts that includes course FCN 401, *Awarding and Administering Multiple Award Schedules*.

Management Comments

The FAS Commissioner agreed with our finding and concurred with our recommendation. Management comments are included in their entirety as **Appendix C**.

⁷ We confirmed that 274 contracting officers work on schedule related projects, as of May 2014.

Finding 2 – Contracting officers are taking non acquisition-related courses to maintain their warrants.

Contracting officers are taking courses that are “required for employment” and unrelated to government contracting to maintain their warrants. As a result, contracting officers are receiving credit for non acquisition-related training rather than training that is needed to enhance their competencies and enable them to better procure products or services for the federal government.⁸ The General Services Administration Acquisition Manual (GSAM) requires contracting officers to obtain 80 Continuous Learning Points (CLPs) every 2 years (also known as the contracting officer’s continuous learning period).⁹ In the most recent revision of the GSAM, applicable training is competency-based training, defined by the Defense Acquisition Workforce Improvement Act’s criteria.¹⁰

We determined that the regions and Central Office interpret applicable training differently. Specifically, Region 9 and Central Office restrict granting CLPs only for acquisition-related courses or activities. Conversely, other regions grant CLPs for non acquisition-related courses that are a condition of employment, such as the *No Fear Act*, *Telework Works*, or *Attending a Conference* courses. Based on our review of training and certification history in the Federal Acquisition Institute Training Application System (FAITAS), we identified the following:

- Of the 98 regional contracting officers with complete records in FAITAS, 39 were awarded CLPs for non acquisition-related courses. Moreover, 11 would not have met the 80 CLP requirement if the non acquisition-related courses were excluded.

The Senior Procurement Executive agreed that contracting officers should receive only acquisition-related training to maintain their warrants. Furthermore, the Federal Acquisition Institute provides guidance on the GSAM and Defense Acquisition Workforce Improvement Act competencies. The inconsistent application of policy and guidance has led to contracting officers using non acquisition-related training to maintain their warrants.

Recommendation 2

2. Ensure all continuous learning supports the competencies associated with the Federal Acquisition Certification in Contracting certification.

⁸ The Federal Acquisition Institute identified one professional and ten technical areas of competency needed by a contracting officer to perform their job.

⁹ Requirement is from GSAM 501.603-3(d)(1). One CLP is equal to 1 hour of training experience under responsible, qualified direction and instruction.

¹⁰ GSAM 501.6 was revised on January 13, 2015.

Management Comments

The FAS Commissioner agreed with our finding and concurred with our recommendation. Management comments are included in their entirety as **Appendix C**.

Finding 3 – Contracting officers are faced with limited, live instructor-led training options.

Interviews of both senior contracting officers and recently appointed contracting officers disclosed a shared opinion - more live instructor-led training to supplement on-the-job and online training would be beneficial.¹¹ The limited opportunities for live instructor-led training result in contracting officers taking non acquisition-related courses to meet their CLP requirements. A majority of the contracting officers interviewed said that, due to reduced travel budgets, they are relegated to taking online training provided by the Federal Acquisition Institute. Other comments by the contracting officers included:

- A preference for more live training, especially for courses that teach subject matter that is more open to interpretation. Online training may be more beneficial if the subject matter is related to a policy update.
- A preference for more formal instructor-led training because the courses are typically taught by instructors experienced in the courses' subject matter. In addition, training open to other agencies offers GSA contracting officers' opportunities to interact and collaborate with contracting officers from other agencies on resolving complex procurement scenarios.
- A government contracting course, *The FAR Boot Camp*, and a Price Analysis seminar taught by pricing experts from the Warner Robins Air Force Base were both well received.¹²

Our review of FAS budget information revealed significant unused training budget funds for FY 2013 (see *Figure 1* on page 6).

¹¹ Live instructor-led training pertains to in-classroom training taught by a professional instructor employed by a commercial vendor or a subject matter expert.

¹² The Warner Robins Air Force Base is located in Region 4 and the April 2014 seminar was attended by regional FAS contracting personnel.

**Figure 1 – Budgeted and Actual
Acquisition Training Expenses for FY 2013**

| Location | Budgeted | Actual | Unused |
|-------------------------|---------------------|-------------------|-------------------|
| Central Office | \$ 532,345 | \$ 92,166 | \$ 440,179 |
| Region 6 | 164,739 | 68,348 | 96,391 |
| National Capital Region | 75,428 | 9,190 | 66,238 |
| Region 10 | 151,693 | 91,245 | 60,448 |
| Region 2 | 83,066 | 31,146 | 51,920 |
| Region 5 | 32,039 | 15,523 | 16,516 |
| Region 9 | 28,651 | 20,171 | 8,480 |
| Region 8 | 9,704 | 3,207 | 6,497 |
| Region 4 | 17,844 | 17,065 | 779 |
| Region 7 | 77,734 | 79,450 | (1,716) |
| Region 3 | 39,538 | 44,207 | (4,669) |
| Region 1 | 3,200 | 37,170 | (33,970) |
| Total | \$ 1,215,981 | \$ 508,888 | \$ 707,093 |

Data is based on information for Object Class 25 - Training Acquisition Workforce.¹³

The financial data shows that nearly 60 percent of the training budget was not used. Region 7 supplemented its internal training program by procuring ten instructor-led courses onsite during FY 2013, yet stayed within 2 percent of its training budget. Furthermore, cost information for the course *Developing Performance-Based Statements of Work* indicated that Region 9 saved between \$865 and \$1,530 per student by having the course taught onsite.¹⁴ Central Office and the regions should assess the use of more live and onsite training opportunities to better develop its contracting officers, based on training funds available.

Recommendation 3

3. Encourage the use of acquisition training budgets to procure more live instructor-led training courses, to better develop and engage the acquisition workforce.

Management Comments

The FAS Commissioner agreed with our finding and concurred with our recommendation. Management comments are included in their entirety as **Appendix C**.

¹³ Object Class 25 includes any acquisition training taught by a commercial vendor, GSA, or other federal agency. Travel costs are not included in Object Class 25. The budget amount is based on the percentage of prior year funds actually spent on acquisition training compared to the average salaries for all employees in the region.

¹⁴ The cost savings are based on comparing the average student cost incurred of \$130 for onsite instruction to the per diem rates and flight costs for courses taught in Las Vegas, Nevada, and Washington, D.C.

Finding 4 – Training coordinators in Central Office are limited in their ability to track the training requirements of contracting officers within the Federal Acquisition Institute Training Application System.

Training coordinators in Central Office do not have access to reports in FAITAS to effectively manage the training programs and requirements for their assigned contracting officers. As a result, contracting officers may be awarding and administering contracts while not meeting their training requirements.¹⁵ If a contracting officer's FAC-C is suspended or revoked, the Head of Contracting Activity can terminate their warrant.

The Bureau Certification Managers assist the Agency Career Manager in ensuring contracting officers comply with the FAC-C requirements imposed by the Office of Federal Procurement Policy. Due to the significant number of contracting officers who report to Central Office, each of the four FAS portfolios designates a training coordinator(s) to manage and execute their training programs. The training coordinators are also responsible for assisting the Bureau Certification Managers by providing a first level review to ensure contracting officers meet their FAC-C requirements. However, the coordinators cannot generate reports in FAITAS to track completion of FAC-C requirements by their assigned contracting officers. We identified five contracting officers who did not meet their FAC-C requirements, but still maintained their warrants. If training coordinators had the ability to generate reports in FAITAS, they could have ensured their assigned staff met the minimum training requirements.

Training coordinators must submit a request to the Acquisition Career Management Division to view a current report of their assigned contracting officers, or wait for the next quarterly report to be provided.¹⁶ The audit team ran a report from FAITAS and noted Central Office had the most contracting personnel that did not meet their FAC-C continuous learning period requirements.¹⁷ This report is important to training coordinators because it shows the number of CLPs that a contracting officer needs to meet the FAC-C continuous learning period requirement. Training coordinators need access in FAITAS to better assist the Bureau Certification Managers in ensuring the Central Office reporting contracting officers meet their training requirements.

¹⁵ A contracting officer meets their FAC-C requirement if 80 CLPs are obtained during their continuous learning period. If the requisite CLPs are not achieved by the end of the continuous learning period, their status expires and certification is revoked.

¹⁶ The specific report in FAITAS is titled "CL Status – Current vs. Expired Summary Report." The Agency Career Manager has agency-wide access to this report; Bureau Certification Managers only have access for the contracting officers in their region or service.

¹⁷ A review of the FAITAS report titled "CL Status – Summary" showed that in FY 2013, 70 percent of the revoked FAC-C were Central Office personnel.

Recommendation 4

4. Grant Central Office portfolio training coordinators system access to generate reports in the Federal Acquisition Institute Training Application System that track Federal Acquisition Certification in Contracting and warrant compliance for their assigned staff.

Management Comments

The FAS Commissioner agreed with our finding and concurred with our recommendation. Management comments are included in their entirety as **Appendix C**.

Finding 5 – The database used to track warrant and Federal Acquisition Certification in Contracting information for FAS contracting officers is not current or accurate.

The Master Warrant List (master list) used by the Acquisition Career Management Division to track warrant and FAC-C information for FAS contracting officers contains outdated and incorrect information.¹⁸ The warrant program requires all services, regions, and zones to maintain reports that reflect “consistent and up to date information on the number of contracting officer warrants issued and terminated.”¹⁹ FAS relies on the Bureau Certification Managers and Central Office training coordinators to review and update the master list on a quarterly basis. However, we identified inaccurate records in the master list for five regions and Central Office that include: (1) missing records, (2) incorrect or outdated warrant status, (3) miscategorized reporting region, and (4) duplicate records. These errors comprised 15 percent of all records in the master list. It appears that Bureau Certification Managers are not updating all information for their regional reporting contracting officers on a quarterly basis, as required by the warrant program.

Based on information provided after our exit conference, FAS is no longer relying on the master list to track information for its warranted contracting officers.²⁰ Instead the warrant information is being validated for accuracy prior to being uploaded into FAITAS. After all warrant information has been uploaded, FAITAS will be the single database for contracting officers’ warrant and FAC-C information.

¹⁸ The information identified in the master list includes contracting officer’s warrant level, warrant issuance date, and FAC-C level.

¹⁹ Requirement is from GSAM 501.603-3(f)(3).

²⁰ The results of our audit were discussed with management from the Office of Acquisition Management on September 16, 2014.

Recommendations 5 and 6

5. Ensure all warrant information is current and accurate in the Federal Acquisition Institute Training Application System warrant module.
6. Establish a process whereby Bureau Certification Managers and/or training coordinators routinely validate warrant information in the Federal Acquisition Institute Training Application System.

Management Comments

The FAS Commissioner agreed with our findings and concurred with our recommendations. Management comments are included in their entirety as **Appendix C**.

Other Observation

We noted a selection process used by Region 4 and the National Capital Region that better assesses a warrant applicant's qualifications. These regions require warrant applicants to undergo a formal interview panel that is comprised of members of the regions' warrant board. The applicant is asked questions that assess their knowledge of the FAR and situational-based questions that test their critical thinking skills. After the interview, the participating board members decide whether or not to nominate the applicant to the Head of Contracting Activity for warrant issuance. This selection process is more comprehensive than a typical warrant board that bases its decision to nominate on a review of paper documents. Finally, the use of an interview panel by two regions that vary significantly in size demonstrates how this process can potentially be implemented by any warrant board and/or Central Office contracting portfolio.²¹

²¹ The Office of Acquisition Operations, under the Office of Travel, Motor Vehicle, and Card Services, is in the process of implementing an interview requirement for warrant applicants.

Conclusion

FAS is not providing specialized training needed for awarding and administering Multiple Award Schedule contracts. As a result, GSA customers are at a greater risk of paying higher prices and not achieving best value. Contracting officers are taking non acquisition-related courses to maintain their warrants and individuals responsible for ensuring contracting officers meet their training requirements are limited in their ability to track compliance. Additionally, FAS should analyze its budget for acquisition training to identify opportunities for more live instructor-led training. Finally, FAS is not complying with the warrant program requirements for maintaining a current and accurate database.

Appendix A – Purpose, Scope, and Methodology

Purpose

This audit was included in the GSA Office of Inspector General FY 2014 Audit Plan.

Scope and Methodology

We audited training and warrant information representing 43 percent of the identified 540 FAS contracting officers (***Appendix B***). We conducted our site visits at Regions 4, 7, 9, 10, and the National Capital Region and the four contracting portfolios at Central Office.

To accomplish our objective, we:

- Reviewed Region 6 warrant files in electronic format and obtained warrant information from Regions 2, 3, and 5;
- Interviewed members of each warrant board for the regions visited and Central Office, and officials from the Office of Government-wide Policy, the Multiple Award Schedule Program Division, and the National Aeronautics and Space Administration;
- Held discussions with contracting officers and their management teams;
- Evaluated warrant files and training information in FAITAS for contracting officers;
- Assessed compliance by regional and Central Office Bureau Certification Managers of the requirements for warranting contracting officers imposed by the Office of Management and Budget and GSA;
- Reviewed descriptions for schedule-related courses that contracting officers are required to complete;
- Identified core competencies needed by contracting officers to perform their job;
- Assessed course feedback and content for FCN 401, *Awarding and Administering Multiple Award Schedules*;
- Evaluated the Master Warrant List used by the Acquisition Career Management Division to track warrant and FAC-C information for contracting officers;
- Determined the number of contracting officers that used CLPs from non acquisition-related courses to meet their warrant requirements;
- Identified which reports in FAITAS are needed by training coordinators in Central Office to effectively track the warrant requirements for their assigned staff;
- Obtained information for live onsite courses procured by Regions 4, 7, and 9; and
- Evaluated funding information for acquisition training during FY 2013.

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

We conducted our audit between November 2013 and September 2014 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 objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Internal Controls

The scope of our work was limited to addressing the objective of this audit. Thus, our assessment and evaluation of internal controls was restricted to those issues identified in the Results section of this report.

Report Qualification

We did not review training information in FAITAS for contracting officers that were warranted prior to January 1, 2007. Training information for these contracting officers is not captured in FAITAS and is manually tracked by the Bureau Certification Managers.

Appendix B – Number of Contracting Officers by Location

This appendix summarizes the total number of contracting officers by region or office and those that award schedule contracts.

| Location | Total Number of Contracting Officers | Total Number of Contracting Officers that Award Schedule Contracts |
|-------------------------|---|---|
| Region 1 | 4 | 0 |
| Region 2 | 39 | 23 |
| Region 3 | 45 | 23 |
| Region 4 | 35 | 0 |
| Region 5 | 11 | 0 |
| Region 6 | 42 | 12 |
| Region 7 | 76 | 44 |
| Region 8 | 7 | 0 |
| Region 9 | 15 | 0 |
| Region 10 | 32 | 22 |
| National Capital Region | 12 | 0 |
| Central Office | <u>222</u> | <u>150</u> |
| Total | 540 | 274 |

Appendix C – Management Comments



GSA Federal Acquisition Service

MEMORANDUM FOR PAULA N. DENMAN
REGIONAL INSPECTOR GENERAL FOR AUDITS
GREATER SOUTHWEST REGION AUDIT OFFICE

FROM: THOMAS A. SHARPE
FEDERAL ACQUISITION SERVICE (FAS)
FAS COMMISSIONER

12 5 Jun 2015

SUBJECT: Draft Report A1400008, FAS Needs to Strengthen its Training and Warranting Programs for Contracting Officers

Thank you for the opportunity to provide additional input to Draft Report A1400008. The FAS mission is acquisition in support of our customers, and as such, we take the development of our contracting professionals very seriously. FAS looks forward to receiving the final report on ways to strengthen the training and warrant programs for contracting officers.

Finding 1 – Specialized training is needed for contracting officers awarding and administering Multiple Award Schedule contracts.

Recommendation 1

1. Provide specialized training for contracting officers who award and administer Multiple Award Schedule contracts that include course FCN 401, *Awarding and Administering Multiple Award Schedules*.

Management Comments: Management concurs.

The Office of Acquisition Management in FAS has developed and finalized course FCN 401, *Awarding and Administering Multiple Award Schedules*. FCN 401 is expected to be available in FAITAS or the DAU portal by the end of this fiscal year, and the acquisition workforce will be notified accordingly.

More generally, the core CON classes required for FAC-C certification focus on those foundational basics that apply to Multiple Award Schedules (MAS) contracts— acquisition planning, contract award, contract administration. Acquisition Centers also provide ongoing internal training to their acquisition workforce members.

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Appendix C – Management Comments (cont.)

Finding 2 – Contracting officers are taking non acquisition-related courses to maintain their warrants.

Recommendation 2

2. Ensure all continuous learning supports the competencies associated with the Federal Acquisition Certification in Contracting (FAC-C).

Management Comments: Management concurs.

Based on policy stated in the May 7, 2014 [memorandum from the Office of Federal Procurement Policy \(OFPP\)](#), GSA has identified on the [Acquisition Portal](#) areas in which employees can earn Continuous Learning Points (CLPs). Continuous learning by acquisition workforce members serves to improve the outcome of Federal procurements and benefits the public interest. Regular participation in continuous learning activities and programs enhance the skills of acquisition professionals, affords them opportunities for professional growth, and improves the quality of services rendered. In general, no single activity should be used to accumulate all CLPs required for certification maintenance. Workforce members should make an effort to participate in a variety of acquisition-related activities designed to give the member a well-rounded perspective of his/her acquisition function. CLPs may be earned in a number of ways as shown in the examples below:

- Take a classroom or online course in contracting, business skills, or a technical area related to employee's job, such as IT.
- Participate in government contracting-related professional activities.
- Teach classes in government contracting.
- Publish articles in professional journals or magazines on topics in government contracting.
- Develop, present, or participate in a seminar on government contracting.

More information on earning CLPs may be accessed on the GSA [Acquisition Portal](#) with this link [CLP Requirements Guidance](#).

Finding 3 – Contracting officers are faced with limited, live instructor-led training options.

Recommendation 3 (Revised)

3. Encourage the use of acquisition training budgets to procure more live instructor-led training courses, to better develop and engage the acquisition workforce.

Management Comments: Management concurs.

The FAS portfolios in Central Office and the Regions will be encouraged to more fully utilize their training budgets and, where applicable, share training costs to sponsor in-person acquisition training onsite. In addition, the FAC-C Certification Program offers acquisition professionals both classroom and online training.

Appendix C – Management Comments (cont.)

In Fiscal Years 2012 and 2013, the FAS Office of Acquisition Management contracted for the entire FAC-C curriculum training courses to be given onsite in Central Office. Although the curriculum was initially put in place to assist interns in becoming FAC-C certified, it was eventually opened up to all employees within GSA. The training was originally well received with full participation. Over time, however, lack of advance cancellation and ongoing participation had a negative impact on the training classes. With more stringent participation and cancellation requirements, it may be possible to reinstate such a training program, subject to interest and support from the business portfolios.

Finding 4 – Training coordinators in Central Office are limited in their ability to track the training requirements of contracting officers within the Federal Acquisition Institute Training Application System database.

Recommendation 4

4. Grant Central Office portfolio training coordinators system access to general reports in the Federal Acquisition Institute Training Application System that track Federal Acquisition Certification in Contracting and warrant compliance for their assigned staff.

Management Comments: Management concurs.

Currently, requirements for system enhancements to FAITAS are already being developed by the Office of Acquisition Management in collaboration with the GSA Acquisition Career Manager. Changes are underway to reconfigure the FAS Central Office FAITAS Bureau into organizationally aligned bureaus within FAITAS that will provide the FAS Central Office Bureau Career Managers with the ability to generate reports by portfolio. Implementation is expected to begin no later than the end of fiscal year 2016. The next phase of the enhancement is to provide report access and generation to the training coordinators in the respective portfolios within FAS Central Office.

Finding 5 – The database used to track warrant and Federal Acquisition Certification in Contracting Information for FAS contracting officers is not current or accurate.

Recommendation 5 and 6 (Revised)

5. Ensure all warrant information is current and accurate in the Federal Acquisition Institute Training Application System warrant module.
6. Establish a process whereby Bureau Certification Managers and/or training coordinators routinely validate warrant information in the Federal Acquisition Institute Training Application System.

Appendix C – Management Comments (cont.)

Management Comments: Management concurs.

FAITAS has been the official training record for GSA as of June 2012. This training module is a reliable source of information as it has the capability of producing reports on the status of the workforce's FAC certification, continuous learning points, and expired or revoked certifications. The addition of the warrant module in FAITAS is expected to be operational for FAS Center Office by the end of this fiscal year or sooner and will provide access to accurate reports on warrants for FAS.

As part of the implementation process, warrants that were issued manually are being uploaded in the module. The FAS Bureau Certification Managers in FAS Central Office and in the regions currently collaborate with the GSA Acquisition Certification Manager's office in reviewing and validating the information as the first step in that process.

After completion of the implementation of the warrant module in Central Office and each region, no additional validation will be required as the warrant process for new warrants will be transparent, electronic, and documented from start to finish in FAITAS.

If you have any questions, please contact Linda Smith, Director of the FAS Acquisition Career Management Division at lindal.smith@gsa.gov or (703)-605-2915.

cc: Wayne Williams (H1ABA)
Claudia Davis (H1ABA)

Appendix D – Report Distribution

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