



OFFICE OF INSPECTOR GENERAL

Catalyst for Improving the Environment

Followup Audit Report

Progress Made in Improving Use of Federal Supply Schedule Orders, but More Action Needed

Report No. 2007-P-00037

September 20, 2007

Report Contributors:

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Abbreviations

CMM	Contracts Management Manual
FAR	Federal Acquisition Regulation
FSS	Federal Supply Schedule
EPA	U.S. Environmental Protection Agency
GSA	General Services Administration
IGCE	Independent Government Cost Estimate
OAM	Office of Acquisition Management
OIG	Office of Inspector General



At a Glance

Catalyst for Improving the Environment

Why We Did This Review

The objectives of our audit were to determine whether the U.S. Environmental Protection Agency (EPA) implemented the agreed-upon corrective actions from a previous Office of Inspector General (OIG) report on Federal Supply Schedule (FSS) orders. We also sought to determine whether EPA is following established procedures in awarding FSS orders.

Background

In September 2003, we issued Audit Report No. 2003-P-00015, *EPA Can Improve Use of Federal Supply Schedules When Procuring Services*. EPA was in general agreement with the report, and agreed to implement several recommendations to improve the process for ordering from the FSS. Ordering agencies, such as EPA, can issue orders directly to contractors that are on the schedules approved by the General Services Administration.

For further information, contact our Office of Congressional and Public Liaison at (202) 566-2391.

To view the full report, click on the following link:
www.epa.gov/oig/reports/2007/20070920-2007-P-00037.pdf

Progress Made in Improving Use of Federal Supply Schedule Orders, but More Action Needed

What We Found

EPA implemented all but one of the recommendations in our original report. As a result of this previous report, EPA:

- Published guidance in its Contract Management Manual for issuing orders against the FSS.
- Provided training to its contracting officers on the use of the General Services Administration's Schedule, market research, and Performance-Based Service Acquisitions.
- Is acquiring a new, commercial off-the-shelf Federal acquisition system for Agency-wide use over the Internet that will replace the Agency's current systems.

Regarding the one recommendation not implemented, EPA did not provide samples of sole source justifications to program offices as agreed. Agency officials said this occurred due technology challenges in sharing files. However, posting justifications on EPA's intranet should resolve the issue.

During our review, we noted other areas that require attention. By ensuring that adequate market research is conducted, EPA can increase competition. Also, Independent Government Cost Estimates need improvement to ensure EPA does not overpay for services and supplies acquired via the FSS.

What We Recommend

We recommend that the Assistant Administrator for Administration and Resources Management provide examples on EPA's intranet of adequate justifications for limiting competition. We also recommend that the Assistant Administrator emphasize Quality Assessment Plan requirements for evaluating: the effectiveness of market research, justifications for limiting competition, development of Independent Government Cost Estimates, and the use of the FSS order checklist. Further, we recommend that Office of Acquisition Management market the benefits of online procurement tools to contracting staff. EPA agreed with all of our recommendations and plans to implement the corrective measures we proposed.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
INSPECTOR GENERAL

September 20, 2007

MEMORANDUM

SUBJECT: Progress Made in Improving Use of Federal Supply Schedule
Orders, but More Action Needed
Report No. 2007-P-00037

FROM: Melissa M. Heist *Melissa M. Heist*
Assistant Inspector General for Audit

TO: Luis A. Luna
Assistant Administrator
Office of Administration and Resources Management

This is our final report on the subject audit conducted by the Office of Inspector General (OIG) of the U.S. Environmental Protection Agency (EPA). This audit report contains findings that describe the problems the OIG has identified and corrective actions the OIG recommends. This audit report represents the opinion of the OIG and the findings contained in this report do not necessarily represent the final EPA position. Final determinations on matters in this audit report will be made by EPA managers in accordance with established audit resolution procedures.

Action Required

In accordance with EPA Manual 2750, you are required to provide a written response to this report within 90 calendar days of the date of this report. You should include a corrective action plan for agreed upon actions, including milestone dates.

The estimated cost of this report – calculated by multiplying the project's staff days by the applicable daily full cost billing rates in effect at the time – is \$181,758.

If you or your staff have any questions regarding this report, please contact me at 202-566-0899 or heist.melissa@epa.gov, or Carl Jannetti at 215-814-2350 or jannetti.carl@epa.gov.

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Purpose

The objectives of our audit were to determine whether the U.S. Environmental Protection Agency (EPA) implemented the agreed-upon corrective actions from a previous Office of Inspector General (OIG) report on Federal Supply Schedule (FSS) orders. We also sought to determine whether the Agency is following established procedures in awarding FSS orders.

Background

The FSS program, directed and managed by the General Services Administration (GSA), provides Federal agencies with a simplified process for obtaining commonly used commercial supplies and services at prices associated with volume buying. GSA issues FSSs with the information necessary for placing orders with contractors. Ordering agencies issue orders directly to these contractors for supplies and services.

On September 29, 2003, we issued Audit Report No. 2003-P-00015, *EPA Can Improve Use of Federal Supply Schedules When Procuring Services*. This report discussed the need to improve EPA's procedures for initiating FSS orders. Specifically, we noted that:

- EPA staff could increase competition for FSS awards by seeking and obtaining competitive quotes. Lack of sufficient quotes was attributed to insufficient sole source justifications, ineffective planning, rushed procurements, insufficient market research, and limited time offered to potential sources to submit quotes.
- EPA awarded FSS orders without always complying with established policies, procedures, and regulations. For example, Statements of Work were not always performance-based, requests for quote lacked required evaluation factors, Independent Government Cost Estimates lacked necessary information, and price reductions were not sought from contractors.

EPA was in general agreement with the report and agreed to implement many of the recommendations. Those recommendations and a discussion of corrective actions taken are in Appendix A.

Federal Acquisition Regulation (FAR) Subpart 8.4 describes Government policy for FSS orders. Since our report, FAR Subpart 8.4 has been amended twice regarding competition. In June 2004, the FAR was amended to incorporate revised ordering procedures for orders against the FSS, including new documentation requirements for justifying sole source orders. In July 2005, the FAR was amended again to clarify competition requirements for FSS orders.

EPA's Office of Administration and Resources Management, which includes the Office of Acquisition Management (OAM), is responsible for policies, procedures, operations, and support of the Agency's procurement and contracts management program. For the cases we reviewed, EPA project officers submitted requests for FSS orders to Office of Administration and Resources Management contracting officers, who issued the orders.

Noteworthy Achievements

EPA implemented all but one of the recommendations in our original report. As a result of this previous report:

- In September 2005, EPA published procedures in its Contracts Management Manual for issuing orders against the FSS. A new chapter in the manual addresses both project officer and contracting officer responsibilities for acquisition planning, conducting market research, competing FSS orders, requiring the use of an FSS order checklist, and preparing sole source justifications.
- EPA has provided training to its contracting officers on GSA schedule training, market research, and Performance-Based Service Acquisitions.
- EPA is in the process of acquiring a new commercial off-the-shelf Federal acquisition system for Agency-wide use over the Internet to replace the Agency's current systems.

We noted a best practice regarding EPA's use of an online marketplace to streamline the purchase of simple commodities. On September 20, 2006, EPA awarded a \$15,300 FSS order (EP06H002856) for laser printers, scanners, and associated maintenance agreements. EPA used FedBid for this purchase – an online marketplace for the Federal Government acquisition of commercial items. Using FedBid, EPA notified 1,584 sellers of its needs. Three sellers submitted bids. EPA awarded the order to the lowest bidder, and saved almost \$2,200, or 12 percent. The Office of Management and Budget encourages agencies to use online procurement services for acquisition of commercial items. Use of these services could also result in administrative savings.

Scope and Methodology

We performed this audit from May to July 2007 in accordance with generally accepted government auditing standards. From April 1 through September 30, 2006, EPA initiated 517 GSA orders, valued at about \$89 million. From these orders, we selected a random sample of 10 FSS orders, valued at \$680,000, for this review. We visited EPA Headquarters in Washington, DC, and reviewed the contract files for the orders sampled. We also interviewed contracting and project officers, as well as the EPA Competition Advocate.

In planning and performing our audit, we reviewed EPA's implementation of recommendations from our previous audit. We also reviewed management controls related to our objectives, including the Agency's guidance for awarding FSS orders. Further, we reviewed the Office of Administration and Resources Management's Fiscal Year 2006 Assurance Letter and Integrity Act Report. In addition, we reviewed Quality Assessment Plans

Table 1: Sampled FSS Orders
EP06H001923
EP06W000379
EP06H002856
EP06H001419
EP07H000622 *
EP06H001489
EP06H001665
EP06H002266
EP06H002848
EP06H001429
Source: EPA's OAM
* Although this order was included in the universe awarded between April 1 and September 30, 2006, upon further review we determined it was awarded in January 2007. However, we kept it in our sample.

and the results of the Quality Assessment Plan Oversight Reviews for both the Headquarters Procurement Operations Division and Superfund/Resource Conservation and Recovery Act Regional Procurement Operations Division.

We examined FAR Part 5 - *Publicizing Contract Actions*, Part 7 - *Acquisition Planning*, Subpart 8.4 - *Federal Supply Schedules*, Part 10 - *Market Research*, and Part 11 - *Describing Agency Needs*. We also examined the GSA Ordering Procedures for FSS Orders, Federal Acquisition Circular Number 2005-05, and other policy documents related to our review.

Results of Review

EPA implemented all but one recommendation from our previous report. For the recommendation not implemented, EPA had agreed to provide samples of sole source justifications to program offices. EPA officials informed us they were going to provide examples of those justifications on OAM's e-library. However, this initiative did not occur because of technology challenges – the Agency was unable to share files across OAM locations. We recommend these justifications be posted on EPA's intranet.

In addition, during our review, we noted a few areas that require more attention. Details follow.

Improved Market Research Provides More Competition

In its simplest form, market research is information gathering. FAR Part 10 provides that agencies must conduct market research before developing new requirements, to determine if there are sources capable of satisfying the agency's requirements and if commercial items are available. FAR Subpart 8.4 allows restricted competition when only one source is available because of the unique or specialized nature of the work, or when an urgent and compelling need exists. Of the four FSS orders in our sample where competition was limited, we found that market research for two was insufficient.

- One order was to purchase additional furniture and to disassemble, transport, and reassemble existing furniture at a new location. The furniture was "systems" furniture that needed to be purchased and installed by one of the manufacturer's dealerships. This manufacturer had authorized dealerships throughout the country. The project officer told us she called the manufacturer and asked for a dealership that could work with the Federal Government. She said she did not recall asking for more than one dealer, and stated her standard practice is to contact only one potential vendor. Our own market research identified seven dealers (similar to the vendor selected) authorized to work with the Federal Government within 50 miles; four were within 13 miles of the new location. However, the justification for limiting competition had stated that the awardee was the only vendor qualified to provide the services needed. The contracting specialist stated he had accepted the project officer's justification at face value.
- Another order was to hire a firm to help EPA obtain a summer intern. The only indication of market research in the contract file was the project officer's statements regarding positive experiences with the vendor in the past. The justification for limiting

competition stated that the vendor's unique internship program added value to EPA's program office through its ability to identify interns with strong academic skills and interest in the environmental field. However, before the program office created the purchase request and the contracting officer awarded the order, the project officer instructed the contractor to extend an offer for an internship to a named individual. Therefore, the project officer was inappropriately involved in pre-award decisions, since such decisions are only the contracting officer's responsibility. As a result, the Office of Acquisition Management will need to have this unauthorized commitment ratified.

IGCEs Need Improvement

Three of the 10 orders in our sample were for complex services requiring an Independent Government Cost Estimate (IGCE). The IGCE is to consider the level of effort and labor categories needed to perform the specific task ordered, and determine whether the total price proposed by a vendor is reasonable. The Government should use IGCEs to determine the best value for dollars expended; without such estimates, the Government runs the risk of overpaying. However, for one of the three orders in our sample, the IGCE was significantly underestimated, while for a second the IGCE matched the vendor's estimate almost exactly.

- For one order, the program office's cost estimate was \$270,000. EPA received two proposals in response to its request for quote, at \$286,000 and \$498,500. EPA selected the firm with the higher price. The Government's evaluation of the technical aspects of the two proposals indicated that the higher bid contained a superior approach. With respect to cost, the Government's evaluation and comparison of the two offers stated: "On the matter of cost, the government's estimate of resources required to meet the terms of expertise was underestimated. However, EPA feels the added cost of the [vendor's name redacted] proposal is justified based on the proposed excellent technical approach and expertise that this company will bring to the project." Both the contracting officer and project officer said the understatement occurred because the program office was not familiar with the cost and rate of the highly sought after contractor staff. They also cited the inexperience of EPA staff in developing an IGCE for the type of service acquired.
- For another order, the program office identified 10 labor categories (Senior Executive Consultant, Executive Consultant, Principal Consultant, etc.) in its undated IGCE with corresponding hours required to complete the tasks identified in the order. The only proposal received was from the incumbent, which included the same number of labor hours as EPA's IGCE for 9 of the 10 labor categories. The difference for the tenth category was negligible. The EPA and vendor estimates for travel were also identical. A contracting officer told us that, in general, IGCEs tend to be recycled and cursory in nature.

Other Matters

None of the 10 orders in our sample contained an FSS order checklist. Such a checklist is required by EPA procedures. These procedures state that the checklist will be included in the official file as documentation of the award, and that it should be supplemented by narratives to

support decisions made during the award process of an FSS order. Several contracting staff were unaware of the checklist. Six of the contract files did contain a Simplified Acquisition Worksheet instead of the FSS order checklist designed for FSS orders.

One order for complex services was only open for 2 business days and issued late on a Friday afternoon. EPA's revised procedures recognize that competition can be enhanced when solicitations are open to quotes for an adequate period. These procedures prescribe 10 business days as the norm for solicitation periods, although simple quotes for standard supplies may require less time while complex quotes may require more. One vendor provided the request for quote stated it would not submit a proposal in part because of the short timeframe for responses. The contracting officer told us the program office had an existing FSS order in place with the vendor, and wanted to award this vendor additional work under a sole source justification. The contracting officer said she convinced the program office to compete the new requirement, but because the program office needed the services quickly the solicitation was kept open only 2 days.

Recommendations

While improvements were made, a few areas require more attention. We recommend that the Assistant Administrator for the Office of Administration and Resources Management:

1. Provide examples on EPA's intranet of adequate justifications for limiting competition.
2. Emphasize Quality Assessment Plan requirements for evaluating: the effectiveness of market research, justifications for limiting competition, development of IGCEs, and the use of the FSS order checklist.
3. For the order to obtain an intern, ensure the unauthorized commitment entered into by the program office is ratified.
4. Require OAM to market the benefits of online procurement tools such as FedBid.

Agency Response and OIG Evaluation

OAM concurred with all four recommendations and indicated it would post good examples of justifications for limiting competition on its Web site. OAM also indicated it will emphasize, in a report to be issued by September 30, 2007, Quality Assessment Plan requirements for effective market research, justifications for limiting competition, developing IGCEs, and using the FSS checklist. OAM plans to ratify the unauthorized commitment by October 2007, and conducted several training sessions on Fedbid. Moreover, it will continue to promote procurement tools such as Fedbid and e-Buy through various means. OAM's actions taken and planned meet the intent of our recommendations and should improve the Agency's use of FSS orders. The Agency's full response is in Appendix B.

Status of Recommendations and Potential Monetary Benefits

RECOMMENDATIONS						POTENTIAL MONETARY BENEFITS (in \$000s)	
Rec. No.	Page No.	Subject	Status ¹	Action Official	Planned Completion Date	Claimed Amount	Agreed To Amount
1	5	Provide examples on EPA's intranet of adequate justifications for limiting competition.	O	Assistant Administrator, Office of Administration and Resources Management	12/31/07		
2	5	Emphasize Quality Assessment Plan requirements for evaluating: the effectiveness of market research, justifications for limiting competition, development of IGCEs, and the use of the FSS order checklist.	O	Assistant Administrator, Office of Administration and Resources Management	09/30/07		
3	5	For the order to obtain an intern, ensure the unauthorized commitment entered into by the program office is ratified.	O	Assistant Administrator, Office of Administration and Resources Management	10/31/07		
4	5	Require OAM to market the benefits of online procurement tools such as FedBid.	O	Assistant Administrator, Office of Administration and Resources Management	12/31/07		

¹ O = recommendation is open with agreed-to corrective actions pending
 C = recommendation is closed with all agreed-to actions completed
 U = recommendation is undecided with resolution efforts in progress

OIG Prior Recommendations and Office of Acquisition Management Corrective Actions¹

OIG Recommendation		Corrective Actions Taken
2-1	Develop and implement policies or guidelines to assure FSS awards are competed to the maximum extent practicable.	<ul style="list-style-type: none"> • Updated its Contracts Management Manual (CMM) policies and procedures to address FSS awards, project officer and contracting officer responsibilities regarding market research and Requests for Quote, and acquisition planning requirements for FSS orders. • Developed/provided additional outreach and training on the use of FSSs and market research to the Agency's acquisition staff. • Mandated that all acquisition staff take GSA on-line training on recent revisions to FAR Part 8.4. • Had divisions and regional contracting officers review FSS awards as part of their annual Quality Assurance Plan.
2-2	Develop and implement a coordinated program office procurement planning strategy with Senior Resource Officials to avoid rushed FSS awards and allow more contractors to bid for requested services.	<ul style="list-style-type: none"> • Revised CMM policies/procedures to (a) reflect the increased emphasis on market research, and (b) provide general guideline for soliciting more than three quotes where practicable and determining appropriate time frames for receipt of quotes. • Trained acquisition staff on the use of FSS. • Addressed acquisition planning requirements for FSS orders by including all known/upcoming GSA FSS awards over \$100,000 in acquisition plan and EPA's annual acquisition forecast to the maximum extent possible. • Required that each OAM Division and Regional Contracting Office shall include an activity in their Quality Assurance Plan to ensure quality control of FSS orders.
2-3	Develop and enforce policies and procedures to (a) ensure that FSS sole source awards are adequately justified and (b) provide a format for program offices to use in documenting sole source justifications.	<ul style="list-style-type: none"> • Updated CMM policies/procedures to address the required contract file documentation of sole source justifications and require that a copy of all sole source justifications for FSS orders be provided to the Agency Competition Advocate for trend analysis purposes. • OAM agreed that the quality of file documentation can be improved and planned to post samples of quality documents, such as sole source justifications, on OAM's e-library. However, this initiative did not occur because of technology challenges (i.e., inability to share files across OAM locations). • OAM ensured that its Quality Assurance Plans address reviews of the quality of file documentation for FSS orders and other acquisitions.
3-1	Provide training to emphasize FAR requirements and GSA special ordering procedures.	<ul style="list-style-type: none"> • Provided acquisition guidance on Performance-Based Service Acquisition and Other Alternative Contract Vehicles on OAM's policy Web page, http://intranet.epa.gov/oamintra/policy/index.htm. • Continued to provide training on use of FSS orders and Performance-Based Service Acquisition at its Acquisition Training Conferences.

¹ From September 29, 2003, report, *EPA Can Improve Use of Federal Supply Schedules When Procuring Services*

OIG Recommendation		Corrective Actions Taken
3-2	Periodically provide Senior Resource Officials, contracting officers, and project officers with information/actions taken in response to systemic or significant problems, and best practices identified from prior and current oversight reviews of individual Quality Assurance Plan implemented.	<ul style="list-style-type: none"> Modified CMM policies/procedures requiring that each Division and Regional Contracting Office shall include an activity in their Quality Assurance Plan to ensure quality control of orders against FSS contracts. Prepared a consolidated list of all best practices identified in Quality Assurance Plan reviews (that were published in Flash Notice and/or the quarterly Hot Tips publication on OAM intranet Web site).
3-3	Develop and distribute checklists for managing the processing of FSS task orders that ensure all FAR requirements and GSA special ordering procedures are followed.	<ul style="list-style-type: none"> Updated CMM policy/procedure to include a FSS Order Checklist in the guidance on the use of FSS.
3-4	Enter contractor's past performance appraisals for FSS orders over \$100,000 in the National Institutes of Health system.	<ul style="list-style-type: none"> Amended CMM policy/procedure to require the contracting office and project officer to evaluate and document the contractor's performance in the National Institutes of Health's Contractor Performance System following completion of an FSS order. Included OAM intranet links in training Web sites and the guide on using National Institutes of Health's Contractor Performance System.
4-1	Convene a high level workgroup of EPA procurement and information technology personnel to review the databases used to record FSS information, and develop a plan for bringing a consolidated system online that permits all users to accurately record information for FSS orders.	<ul style="list-style-type: none"> OAM's Information Technology Service Center investigated the feasibility of expanding existing coverage to require Integrated Contract Management System entry for all FSS orders. Conducted a Sources Sought for information purposes only in search of a commercial-off-the-shelf Federal acquisition system to replace its current automated procurement systems.
4-2	Provide training on FSS data entry, and provide contracting officers and program office personnel with user guides, checklists, and best practice examples to re-emphasize the importance of complete and reliable FSS data entry.	<ul style="list-style-type: none"> Revised CMM policy/procedure to address the importance of timely and accurate FSS data entry in the Agency's automated systems. Continued to provide system training, including data entry (such training for data entry in the Agency's automated systems is now captured as part of on-the-job training). The operational divisions performed periodic reviews and validation of data on contract actions.
4-3	Periodically reconcile FSS data to the Integrated Financial Management System and source documents.	<ul style="list-style-type: none"> Updated CMM policy/procedure to reflect the data entry requirement of all FSS orders into the Agency's automated data systems. Conducted periodic exercises to ensure that automated data is reconciled to Integrated Financial Management System data/source documents; future exercises will emphasize verification of FSS data.

Agency Response to Draft Report

September 12, 2007

MEMORANDUM

SUBJECT: Response to Draft Follow-up Audit Report: Progress Made in Improving Use of Federal Supply Schedule Orders, but More Action Needed

FROM: Luis A. Luna
Assistant Administrator

TO: Carl A. Jannetti
Director, Contact Audits

Thank you for the opportunity to submit comments on the draft report entitled, “Progress Made in Improving Use of Federal Supply Schedule Orders, but More Action Needed,” dated August 16, 2007. As you note in your draft report, EPA has successfully implemented 3 of the 4 recommendations made in your September 2003 report. We concur with your further recommendations in this report, and offer the following comments:

Recommendation 1 – Provide examples on EPA’s intranet of adequate justifications for limiting competition.

Response: We concur. OAM will work with its program and Regional customers to find good examples of justifications for limiting competition, and will post them on OAM’s intranet website by December 31, 2007.

Recommendation 2 – Emphasize Quality Assessment Plan requirements for evaluating: The effectiveness of market research, justifications for limiting competition, development of independent Government cost estimates (IGCEs), and the use of the Federal Supply Schedule (FSS) order checklist.

Response: We concur, and will address and emphasize these requirements in an upcoming report on best practices and lessons learned from QAP reviews performed to-date by OAM. We expect this report to be issued by September 30, 2007.

Recommendation 3 – For the order to obtain an intern, ensure the unauthorized commitment entered into by the program office is ratified.

Response: We concur, and will ratify this unauthorized action by October 31, 2007. We will also list this action in our upcoming annual report to the Office of the Chief Financial Officer (OCFO) on FY 2007 contract ratification actions.

Recommendation 4 – Require the Office of Acquisition Management to market the benefits of online procurement tools such as FedBid.

Response: We concur, and note that training sessions on FedBid have been recently conducted in Headquarters, several Regions, RTP, and Cincinnati. We will continue to promote tools such as FedBid and e-Buy within the organization through various other means, such as a Policy Hot Tip notice (the next one due by the end of October 2007), and putting an on-line banner on OAM's intranet home page which promotes such acquisition tools. We expect to have this banner in place in Headquarters, and discuss its potential use in the Regions, RTP, and Cincinnati, by December 31, 2007.

OAM will continue to improve its use of Federal Supply Schedule Orders. We look forward to receiving your final report. Should you have any questions, please contact Kerrie O'Hagan, Director, Policy, Training, & Oversight Division in the Office of Acquisition Management, at (202) 564-4315.

cc: Denise Benjamin Sirmons
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