



November 15, 2016

TO: David S. Ferriero  
Archivist of the United States

FROM: James Springs *James Springs*  
Inspector General

SUBJECT: OIG Audit Report No. 17-AUD-06, *Audit of NARA's Procurement Program*

Attached for your action is our final report, *Audit of NARA's Procurement Program*. NARA verbally concurred with all of the recommendations. Although we gave consideration to year-end work, and work associated with the presidential transition, to date we have not been provided a response to the draft report submitted to the agency on August 26, 2016. It is customary that the reporting process occurs within 45 days.

The report contains 26 recommendations aimed at improving NARA's Procurement Program. We consider all recommendations unresolved and open until management decision is reached, and the OIG receives NARA's formal written response. We look forward to receiving your written action plan and estimated completion dates for implementing the recommendations.

As with all OIG products, we will determine what information is publicly posted on our website from the attached report. Should you or management have any redaction suggestions based on FOIA exemptions, please submit them to my counsel within one week from the date of this letter. Should we receive no response from you or management by this timeframe, we will interpret that as confirmation NARA does not desire any redactions to the posted report.

Consistent with our responsibility under the *Inspector General Act, as amended*, we may provide copies of our report to congressional committees with oversight responsibility over the National Archives and Records Administration.

Please call me with any questions, or your staff may contact Jewel Butler, Assistant Inspector General of Audits, at (301) 837-3000.



Audit of NARA's Procurement Program

November 15, 2016

OIG Audit Report No. 17-AUD-06

# Table of Contents

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<b>Executive Summary</b> .....	4
<b>Background</b> .....	5
<b>Objectives, Scope, Methodology</b> .....	7
<b>Audit Results</b> .....	9
Finding 1. NARA Lacks Strategic Approach to Its Procurement Program.....	9
Recommendations.....	14
Finding 2. NARA’s Acquisition Oversight and Management Needs Improvement .	15
Recommendations.....	24
Finding 3. NARA Lacks Controls over Acquisition Workforce Training and Certifications.....	27
Recommendations.....	34
<b>Appendix A – Future Procurement Audits</b> .....	37
<b>Appendix B – Related Prior Year Recommendations</b> .....	38
<b>Appendix C – Key Responsibilities of CAOs</b> .....	40
<b>Appendix D – Contracting Officer Warrant Limits and</b> .....	41
<b>Appendix E – NARA Acquisitions Deadlines</b> .....	42
<b>Appendix F – Acronyms and Abbreviations</b> .....	44
<b>Appendix G – Management Response</b> .....	45
<b>Appendix H – Report Distribution List</b> .....	46

# Executive Summary

## *Audit of NARA's Procurement Program*

OIG Report No. 17-AUD-06

November 15, 2016

### **Why Did We Conduct This Audit?**

Effective organizational alignment, coupled with strong leadership, enables organizations to implement a coordinated and strategically oriented approach to acquisition activities. The quality and effectiveness of the federal acquisition process depends on developing a capable and competent workforce, and implementing strong internal controls. We performed this audit to assess the effectiveness and efficiency of National Archives and Records Administration's (NARA) procurement program in acquiring goods and services.

### **What Did We Recommend?**

NARA needs to give critical attention to strengthening internal controls over acquisition functions and provide better oversight and management of its procurement activities to ensure effective and efficient processes and procedures that adhere to Federal and internal guidance. This report includes 26 recommendations intended to strengthen the management, accountability, and oversight of NARA's Procurement Program. We intend to conduct follow-on reviews of procurement areas identified during this audit.

### **What Did We Find?**

NARA's Procurement Program did not have the proper management support and visibility within the organization to adequately align acquisition functions with NARA's mission and needs. NARA's acquisition function is not adequately aligned with leadership, key procurement executives are not designated, and required duties and responsibilities are not carried out. NARA has not made procurement a strategic priority and has not assigned its acquisition functions the proper degree of responsibility and authority for strategic planning. Without effective organizational alignment and strong leadership, NARA cannot implement a coordinated and strategically oriented approach to its acquisition activities to ensure mission needs are met.

NARA lacks effective oversight and management of its acquisition activities. NARA's contract oversight office is not staffed, evaluations of internal controls are ineffective and inconsistent, policies and procedures are not up to date, contract files are missing key documents, contracts are not awarded in a timely manner, and the acquisition workload is not proportionate to staff levels. We attribute these conditions to ineffective management decisions and inadequate monitoring of internal controls. When monitoring is not designed and implemented appropriately, organizations are less likely to identify and correct internal control problems on a timely basis.

In addition, NARA lacks effective controls over its acquisition workforce training and certifications. Contracting personnel are not trained commensurate with warrant authority or Contracting Officer Representative oversight levels, training is not adequately tracked, and program and project management certifications are not properly approved. NARA management is not providing the level of oversight required to ensure appropriate training is occurring. Without adequate training and oversight, NARA cannot ensure its acquisition workforce has the competencies necessary to adequately identify needs, develop requirements, perform contracting and purchasing, and oversee contracts for the agency.



**James Springs**

*Inspector General*

## Background

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An acquisition is the procurement by contract of supplies or services by and for the use of the Federal Government through purchase or lease, whether the supplies or services are already in existence or must be created, developed, demonstrated, and evaluated. Acquisition begins at the point when agency needs are established and includes the description of requirements to satisfy agency needs, solicitation and selection of sources, awards of contracts, contract financing, contract performance, contract administration, and those technical and management functions directly related to the process of fulfilling agency needs by contract.

The National Archives and Records Administration's (NARA) Executive for Business Support Services:

- Ensures the development and execution of all financial and acquisition planning and management.
- Provides executive guidance regarding facility repairs and restoration; facility management of the National Archives Building and the National Archives at College Park, including operations, maintenance, repair, improvement, preservation, and restoration; and improvement, preservation, and restoration of Presidential libraries and other NARA-owned facilities.
- Provides executive guidance on the acquisition of land and space planning and utilization; acquisition and consolidation of NARA-leased and owned space, and GSA-owned/leased space; and requirements development, and design and construction of NARA facilities.
- Provides executive guidance to NARA's nationwide acquisition program, and serves as NARA's Chief Acquisition Officer.
- Serves as the Director of Small and Disadvantage Business Utilization.
- Appoints procurement officials with authority to approve warrants over \$100,000,000 and all construction and architectural-engineering services contracting officer authority.

NARA's Acquisition Branch (BCN) supports the nationwide procurement program to acquire the supplies and services needed by NARA units, develops agency procurement policy, oversees the training of all procurement officials and ensures effective and efficient NARA use of the Federal Acquisition Regulations. The Director of Acquisitions appoints all contracting officer authority up to \$100,000,000 except construction and architectural-engineering services contracting officers.

NARA's Space, Planning and Projects Branch (BFS) administers the NARA nationwide space-planning program. BFS conducts or evaluates contractor-prepared facility condition reports and

advises NARA officials on possible consolidation or acquisition of space. BFS evaluates and makes recommendations concerning requests for new space and as a contracting officer, prepares or approves contractor-prepared acquisition documents, solicits bids and proposals, and awards contracts. The Director of BFS is also a contracting officer with an unlimited warrant to purchase.

During fiscal years (FY) 2014 the total value of active contract actions including option years totaled \$1,093,892,169.05; obligation amounts totaled \$196,875,869.51 and consisted of 1,891 contract actions.

### **Federal Acquisition Regulation**

The Federal Acquisition Regulation (FAR) is the primary regulation for use by all Federal Executive agencies in their acquisition of supplies and services with appropriated funds. It became effective on April 1, 1984, and is issued within applicable laws under the joint authorities of the Administrator of General Services, the Secretary of Defense, and the Administrator for the National Aeronautics and Space Administration, under the broad policy guidelines of the Administrator, Office of Federal Procurement Policy (OFPP), Office of Management and Budget (OMB). The FAR precludes agency acquisition regulations that unnecessarily repeat, paraphrase, or otherwise restate the FAR, limits agency acquisition regulations to those necessary to implement FAR policies and procedures within an agency, and provides for coordination, simplicity, and uniformity in the Federal acquisition process. It also provides for agency and public participation in developing the FAR and agency acquisition regulation.

### **The Office of Federal Procurement Policy**

The Office of Federal Procurement Policy in the Office of Management and Budget plays a central role in shaping the policies and practices federal agencies use to acquire the goods and services they need to carry out their responsibilities. OFPP was established by Congress in 1974 to provide overall direction for government-wide procurement policies, regulations and procedures and to promote economy, efficiency, and effectiveness in acquisition processes. OFPP is headed by an Administrator who is appointed by the President and confirmed by the Senate.

### **General Limitations on Procurement Activity**

Only an authorized contracting officer, acting within the scope of their warrant may place an order, make a purchase, award a contract or modification; and make changes to specifications, terms and conditions, cost/price, or delivery schedule of a contract. No NARA employee may obligate the government under a procurement action unless funds are available for the obligation and the employee has the appropriate authority.

## Objectives, Scope, Methodology

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The objectives of this audit are to determine whether NARA's procurement program is efficient and effective for acquiring goods and services. We also followed-up on open recommendations from previous audit reports relating to the procurement program (See Appendix B for Open and Closed Recommendations).

To accomplish our objective, we reviewed internal controls over NARA's Procurement Program and performed certain tests of those controls. We performed the following:

- Examined the (1) Federal Acquisition Regulation (FAR); (2) Federal Manager's Financial Integrity Act of 1982 (FMFIA); (3) OMB Circular A-123, *Management's Responsibility for Internal Control*; (4) Guidelines for Conducting Acquisition Assessments under OMB Circular A-123; (5) Services Acquisition Reform Act (SARA) of 2003; and (6) OMB Office of Federal Procurement Policy guidance;
- Reviewed prior Office of Inspector General (OIG) Audit Reports related to acquisitions with open recommendations;
- Examined the following NARA guidance: (1) NARA's Procurement Guide; (2) NARA Interim Guidance 506-1, *FAC-C Program for Acquisitions Professionals*; (3) NARA 161, *Internal Control Program*; (4) NARA 101, *NARA Organization and Delegation of Authority*; (5) NARA 501, *NARA Procurement*; and (6) NARA organizational charts;
- Interviewed and held discussions with NARA employees and management in Acquisition Branch (BCN), Office of Chief Financial Officer (BC); Business Support Services (B); Space Planning and Projects (BFS); Office of Human Capital (H); Exhibits Division (LX), and Information Services (I);
- Analyzed BCN and BFS Acquisitions for FY 2009-2014 from NARA's procurement system;
- Reviewed Contracting Officers (COs) certificate of appointment (SF 1402) and appointment letters;
- Reviewed contract files for documentation supporting the timeliness of the acquisition process; and
- Surveyed 13 program offices.<sup>1</sup>

We used FY 2014 acquisition data from NARA's procurement system, PRISM, to select a sample of contracts. Out of 1,891 total acquisition actions, we judgmentally selected 32 BCN

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<sup>1</sup> We surveyed 13 key program offices or positions. Not all responded and some key programs sent in more than one response.

and 10 BFS contracts and determined if key documentation existed in the contract file and whether the contract was awarded in a timely manner. We considered contract amounts and contract description when selecting the sample. We did not select contracts done by field office CO's since those were previously audited.<sup>2</sup> We selected at least five contracts from CO's with unlimited warrants and other contracts from CO's with limited warrants. The results of the non-statistical sample cannot be projected to the intended population.

We obtained data from Federal Procurement Data System Next Generation (FPDS) to assess spending by product service codes which describe products, services, and research and development purchased by the federal government. FPDS data excludes purchase cards, freight, interagency agreements, grants, and trust fund transactions.

We also obtained CO's, Contracting Officer Representatives' (COR) and Project/Program Managers' (P/PM) certifications, applications and/or training documentation to determine if the employees were in compliance with the Federal Acquisition Certification-Contracting (FAC-C), FAC-COR and FAC-P/PM which was implemented by the Office of Federal Procurement Policy and Office of Management and Policy.

We did not review grant agreements, purchase cards, and travel cards which are not managed by the Acquisitions Branch. We did not review transportation orders which are regulated by Federal Management Regulations and are not managed by the Acquisitions Branch.

This performance audit was conducted in accordance with generally accepted government auditing standards between January 2015 and September 2016. The generally accepted government auditing standards require we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

The audit was conducted by Carol Seubert, Auditor.

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<sup>2</sup> NARA OIG Audit No. 14-05, Audit of NARA's Field Offices Acquisition Activity.



## Audit Results

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### **Finding 1. NARA Lacks Strategic Approach to Its Procurement Program**

NARA's acquisition function is not adequately aligned with leadership, key procurement executives are not designated, and required duties and responsibilities are not carried out. NARA has not structured its acquisition function to operate strategically, and has not assigned the acquisition function the proper degree of responsibility and authority for strategic planning. An acquisition function needs proper management support and visibility within the organization to align acquisitions with mission and needs. Effective organizational alignment, coupled with strong leadership, enables organizations to implement a coordinated and strategically oriented approach to acquisition activities.

#### A. Chief Acquisition Officer, Senior Procurement Executive, and Contracting Officers

NARA established the Chief Acquisition Officer (CAO) position and the Archivist of the United States (Archivist) delegated the CAO function to the Executive for Business Support Services in 2012. However, the former Executive for Business Support Services, in their role as CAO,<sup>3</sup> did not monitor the performance of NARA acquisition activities, evaluate the performance of those programs using appropriate performance measurements, or ensure the appropriate strategic planning and evaluation of NARA acquisition resources as required. The CAO also did not use the authority given to formally designate someone to the Senior Procurement Executive (SPE) position, nor did they assume the role and responsibilities of the SPE, which is allowed. The CAO verbally delegated the Director of Acquisitions as the SPE, however the Director of Acquisitions does not report directly to the CAO. Without a documented delegation, no one was accountable for the SPE duties.

NARA 101 Part 11.12 describes the CAO's responsibilities as advising and assisting the Archivist in establishing appropriate business strategies to achieve the NARA mission. In addition, NARA 101 Part 11.12 outlines seven acquisition management functions<sup>4</sup> that align with the Services Acquisition Reform Act of 2003 (Title XIV of Public Law 108-136, 41 United States Code (U.S.C.) 1702). NARA 101 Part 11 states the CAO is

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<sup>3</sup> The CAO retired on July 25, 2015. The NARA Chief Facilities Engineer and Operations Manager is acting as Executive for Business Support Services.

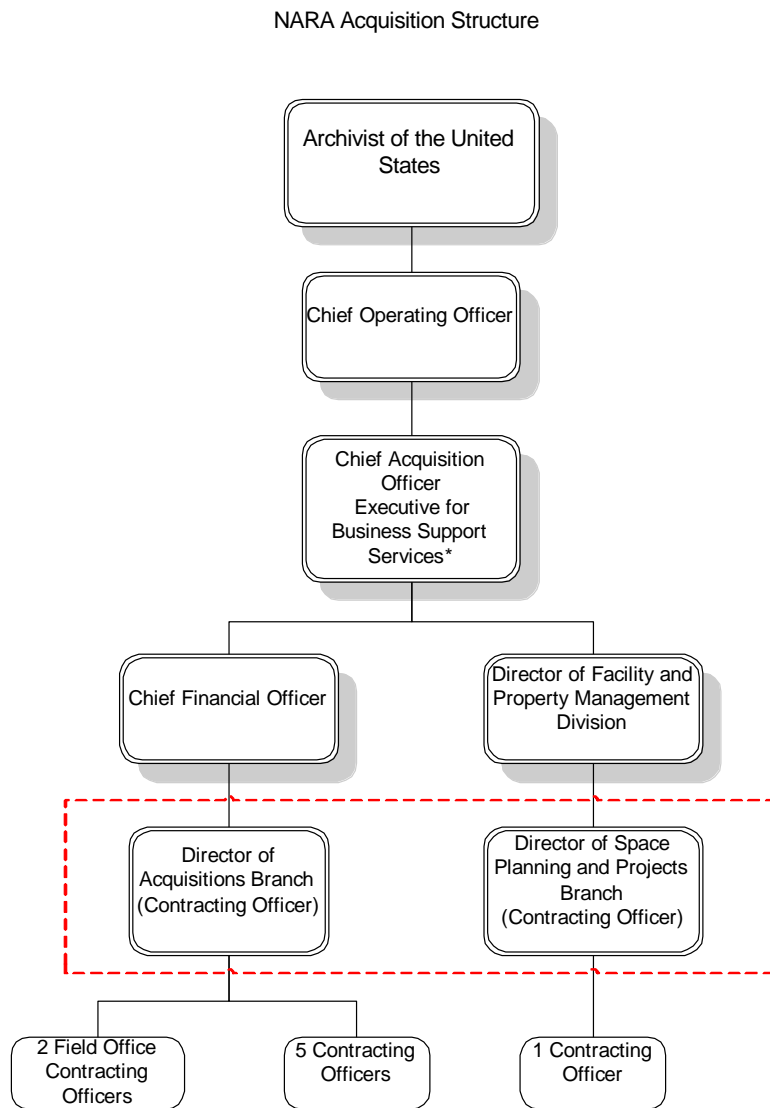
<sup>4</sup> Monitoring and evaluating agency acquisition activities; Increasing the use of full and open competition; Increasing performance-based contracting; Making acquisition decisions; Managing agency acquisition policy; Acquisition career management; and Acquisition resources planning (See Appendix C).

authorized to designate the NARA SPE, who will report directly to the CAO without any intervening authority.

According to NARA 101 Part 11, the SPE is responsible for management direction of NARA’s procurement system, including implementation of NARA procurement policies, regulations, and standards and also serves as NARA’s Head of Contracting Activity. NARA 101 states BCN authorizes, executes, and administers all procurement contracts for property and services required by NARA.

The following figure represents NARA’s structure.

Figure 1.



----- Indicates extra layer of management with no acquisition responsibilities

\*Senior Procurement Executive (SPE) has not been formally delegated by the CAO

OMB Memorandum, *Conducting Acquisition Assessments under OMB Circular A-123*<sup>5</sup> states, “Organizational alignment is the appropriate placement of the acquisition function in the organization, with stakeholders having clearly defined roles and responsibilities.”

The former Executive for Business Support Services acknowledged they were not performing the role of the CAO as OMB intended and did not directly manage the Director of Acquisitions or the Director of Space Planning and Projects. They acknowledged that the Executive for Business Support Services has other significant responsibilities and the functions and duties of the CAO should be separate from the Executive for Business Support Services. This official retired in July 2015 and NARA’s Chief Facilities Engineer and Operations Manager is serving as the Acting Executive for Business Support Services, and by default is the Acting CAO. The Acting Executive did not make any significant changes to the Procurement Program and is not fulfilling the CAO role.

Without an effective CAO who is working closely with managers and Executives, including the SPE, performance improvement staff, Chief Financial Officer (CFO), Chief Information Officer (CIO), Chief Human Capital Officer, and program and project managers, NARA is unable to effectively plan and strategize agency-wide procurement activity. Without a dedicated and effective SPE that reports directly to an effective CAO, NARA lacks the resource necessary to develop and sustain an efficient, effective, and accountable agency acquisition function.

As an example, three BCN COs were authorized warrants with unlimited funds by an official other than the CAO. According to NARA 501 the Executive for Business Support Services can appoint procurement officials with authority to approve warrants over \$100,000,000 and the Director of Acquisitions may appoint CO authority up to \$100,000,000. The Director of Acquisitions forwarded unlimited warrants to the CAO for signature. The former CAO did not sign the unlimited warrants and instead returned them to the Director of Acquisitions for signature. This occurred because of lack of oversight and accountability of the CAO in exercising their responsibilities by not formally delegating authorities and making acquisition policy clear on who may authorize warrants over \$100,000,000. As a result of poor decisions in exercising CAO

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<sup>5</sup> OMB Memorandum, *Conducting Acquisition Assessments under OMB Circular A-123* is not mandatory for NARA as a non-Chief Financial Officers Act agency however; agencies not identified in the CFO Act are strongly encouraged to incorporate the template, as appropriate, into their acquisition and program management review process. This integration will contribute to a more holistic assessment of agency acquisition activities and minimize duplication of effort. Use of the template will also help CAOs in carrying out their responsibilities to monitor the performance of acquisition activities and acquisition programs.

responsibilities, the warrants were authorized in a manner that was not in accordance with NARA policy.

Also, as currently structured, COs are not appropriately aligned with key acquisition executives such as the Director of Acquisitions. The Acquisition Branch reports to the Chief Financial Officer who has no responsibilities over the acquisition process. We found the Architecture/Engineering COs operate independently of the Acquisition Branch. Architecture/Engineering COs are co-located within the Space Planning and Projects Branch. However, they do not report to the Director of Acquisitions and are not overseen by anyone in the Acquisitions chain of command. Architecture/Engineering CO's report to the Executive for Facility and Property Management, who has no responsibilities over the acquisition process. The Executive for Facility and Property Management reports to the Executive for Business Services/Chief Acquisition Officer who, as reported above, is not performing the responsibilities of the CAO position. Without more direct access to the Archivist or an appropriate chain of command, the Director of Acquisitions may not be able to effectively fulfill their responsibility to provide advice and assistance in establishing appropriate business strategies to achieve NARA's mission. Further, acquisition issues may not be receiving the high-level management attention needed without such access.

#### B. Competition Advocate Duties and Responsibilities Not Completed

Competition is a cornerstone of the acquisition system and a critical tool for achieving the best possible return on investment for taxpayers. The benefits of competition in acquiring goods and services from the private sector are well established. Competition saves money for the taxpayer, improves contractor performance, curbs fraud, and promotes accountability for results. Without an effective competition advocate, NARA lacks assurance its procurement practices are conducive to competition and in accordance with FAR requirements.

NARA's competition advocate position is established in NARA guidance. However, the Competition Advocate did not adequately perform some required duties. NARA 501 states the Competition Advocate is the Deputy Executive for Business Support Services who promotes full and open competition in NARA procurements (promoting the acquisition of commercial items) and provides approval and concurrence for acquisition on all justification and approvals. In January 2015, a management and program analyst in Business Support Services was assigned as the acting Competition Advocate. Later in October 2015, the Acting Executive for Business Support Services was delegated the Competition Advocate responsibility.

The Competition Advocate reviews acquisition plans and justification and approval documents for non-competitive procurements. Other than being the approval authority on all justifications and approvals, there is no evidence the Competition Advocate is doing more to promote full and open competition in NARA procurements, and promoting the acquisition of commercial items. In addition, there is no evidence the Competition Advocate prepares a required annual report describing new initiatives to increase competition, increase the acquisition of commercial items, or ensure the requirements are stated in terms of functions to be performed or essential physical characteristics with a performance-based statement of work whenever practicable.

FAR 6.502(b) outlines roles and responsibilities for agency competition advocates.<sup>6</sup> In addition, Part 1 of NARA's General Acquisition Policy states the competition advocate's authority and responsibilities include: providing counsel to NARA regarding competition issues; promoting full and open competition in NARA procurements; promoting the acquisition of commercial items; submitting an annual report to NARA describing new initiatives to increase competition, increase the acquisition of commercial items, and ensure requirements are stated in terms of functions to be performed or essential physical characteristics with a performance-based statement of work whenever practicable; and approving all Justification and Approvals for acquisitions between \$100,000 and \$1,000,000 and concurring on all Justification and Approvals exceeding \$1,000,000.

In 2007, OMB asked CAOs and SPEs to reinvigorate the role of the competition advocate and provided several questions to help agency competition advocates identify if their agency's practices are conducive to competition. Agencies were also instructed to provide a written report with appropriate analysis, including a trend analysis, and recommendations. However, NARA did not prepare these reports.

The Executive for Business Support Services/CAO said the agency did not have a SPE or CAO prior to the reorganization in 2011 so the competition advocate did not prepare the reports. Further, the Acting Competition Advocate was only told by the previous Competition Advocate, Deputy Executive for Business Support Services, to log each Justification and Approval reviewed. According to the former CAO, the Competition Advocate may not have been aware of the requirements in FAR Subpart 6.5 or believed it was not applicable to NARA since it was not a CFO Act Agency.

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<sup>6</sup> FAR 6.502(b) states agency competition advocates shall: (1) Review the contracting operations of the agency and identify and report to the agency senior procurement executive and the chief acquisition officer; (2) Prepare and submit an annual report to the agency senior procurement executive and the chief acquisition officer in accordance with agency procedures; (3) Recommend goals and plans for increasing competition on a fiscal year basis to the agency senior procurement executive and the chief acquisition officer; and (4) Recommend to the agency senior procurement executive and the chief acquisition officer a system of personal and organizational accountability for competition, which may include the use of recognition and awards to motivate program managers, contracting officers, and others in authority to promote competition in acquisition.

## **Recommendations**

We recommend the following to improve NARA's Acquisition structure and process.

**Recommendation 1:** CAO and SPE are structured to ensure alignment with NARA leadership and used by leadership as a business partner in supporting mission needs.

### Management Response

NARA verbally concurs with this recommendation.

### OIG Analysis

Until management decision is reached and the OIG receives NARA's formal written response, we consider this recommendation unresolved and open.

**Recommendation 2:** Archivist ensures the CAO responsibilities and title are assigned or delegated to an official who performs the duties of a CAO, including establishing an effective control environment, identifying acquisition objectives, and assessing the risks facing NARA as it seeks to achieve acquisition objectives.

### Management Response

NARA verbally concurs with this recommendation.

### OIG Analysis

Until management decision is reached and the OIG receives NARA's formal written response, we consider this recommendation unresolved and open.

**Recommendation 3:** CAO formally appoint a SPE and procurement officials who are authorized to approve warrants over \$100,000,000 and approve warrant for construction and architectural-engineering services contracting officers.

### Management Response

NARA verbally concurs with this recommendation.

### OIG Analysis

Until management decision is reached and the OIG receives NARA's formal written response, we consider this recommendation unresolved and open.

**Recommendation 4:** Competition Advocate, in collaboration with the CAO, completes an evaluation and report on the overall strength of NARA's competition practice in accordance with the FAR and OMB guidance.

### Management Response

NARA verbally concurs with this recommendation.

OIG Analysis

Until management decision is reached and the OIG receives NARA's formal written response, we consider this recommendation unresolved and open.

**Recommendation 5:** Competition Advocate, in collaboration with the CAO, develop and implement procedures to promote the acquisition of commercial items and report annually new initiatives to the CAO and SPE.

Management Response

NARA verbally concurs with this recommendation.

OIG Analysis

Until management decision is reached and the OIG receives NARA's formal written response, we consider this recommendation unresolved and open.

**Recommendation 6:** The CAO develop and implement procedures to ensure contracting offices in BCN and BFS report all contract related activity to the SPE.

Management Response

NARA verbally concurs with this recommendation.

OIG Analysis

Until management decision is reached and the OIG receives NARA's formal written response, we consider this recommendation unresolved and open.

**Recommendation 7:** CAO ensure NARA 501 NARA Procurement policy and NARA's General Acquisition Policy addresses procurements related to Architecture/Engineering and Construction.

Management Response

NARA verbally concurs with this recommendation.

OIG Analysis

Until management decision is reached and the OIG receives NARA's formal written response, we consider this recommendation unresolved and open.

**Finding 2. NARA's Acquisition Oversight and Management Needs Improvement**

NARA lacks effective management and has inadequate oversight/monitoring of internal controls of its procurement program. Specifically, the contract oversight office is not staffed, evaluations of internal controls are ineffective and inconsistent, policies and procedures are not up to date,

contract files are missing key documents, contracts are not awarded timely, and the acquisition workload is not proportionate to staff levels. This occurred because of ineffective management decisions and inadequate monitoring of internal controls. Monitoring, as defined in the Committee of Sponsoring Organization of the Treadway Commission (COSO) Framework, is implemented to help ensure “internal control continues to operate effectively.” When monitoring is designed and implemented appropriately, organizations benefit because they are more likely to identify and correct internal control problems on a timely basis; produce more accurate and reliable information for use in decision-making; prepare accurate and timely financial statements, and; be in a position to provide periodic certifications or assertions on the effectiveness of internal control. Without effective management and monitoring of controls, managers are less likely to identify and correct internal control problems on a timely basis.

#### A. Contract Oversight Office

NARA’s Contract Oversight Branch was established in 2011 during NARA’s transformation. However the office has been vacant since inception. NARA 101 describes the role of the Contract Oversight Branch as to: (1) work with NARA program offices to ensure any cost center that receives a budget allocation prepares an acquisition plan for that allocation; and (2) evaluate contract performance to identify contracts that are wasteful, inefficient, or unlikely to meet NARA needs; and partner with Acquisitions to use the results of the evaluations to make future award decisions. NARA has not made staffing the Contract Oversight Branch a priority. According to the CFO, the Contract Oversight Branch has not been staffed because its stated purpose is redundant with responsibilities assigned to the agency CAO. Also according to the CFO, NARA does not intend to staff this branch and may remove it in the next revision of the NARA 101.

Not staffing the Contract Oversight Branch and having a CAO who is not fully fulfilling the roles and responsibilities as required increases the risk program offices will not adequately prepare and plan for acquisition needs to meet NARA’s mission. Additionally, allocation of funds and contracts will not be evaluated to identify waste, inefficiency, or whether contracts meet NARA needs. Not staffing the Contract Oversight Branch is also contrary to NARA 101 policy.

#### B. Internal Control Reviews

NARA’s overall evaluation of internal controls is not effective or consistent because NARA does not have a well-defined and developed Internal Control Program and therefore NARA has not seen the benefits of such a program, such as: (1) improved decision making; (2) risk identification, management, and mitigation; (3) opportunities for process improvement; (4) effective use of budgeted resources; and (5) strategic



planning.<sup>7</sup> NARA's Procurement Program has not been adequately risk rated. Although NARA has a documented Test and Monitoring Plan related to acquisitions, the tests are limited, inconsistently performed to all contracts, and documentation of test results are not maintained.

We reviewed BCN and BFS's Internal Control Test and Monitoring Plans. BCN's Internal Control Test and Monitoring Plan include tests to: (1) perform a comprehensive review of all purchase activity; (2) ensure all General Schedule -1102's, contracting series, are actively and consistently registering for and successfully completed all mandatory contracting courses; and, (3) perform random review of contract files to ensure accuracy, timeliness, and superior quality of work product. BCN internal control reviews of contract files are limited to contract file content using a checklist. In addition, it excludes reviews of BFS Architecture/Engineering and Construction contracts which made up 18 percent of NARA procurement funds awarded in FY 2014.

BFS has a separate plan. BFS's Internal Control Test and Monitoring Plan includes the following:

1. Building Condition Report: Subject to Repairs and Restoration Funding, performed at least two facilities for Building Condition Reports.
2. Federal Real Property Profile Report input online in the General Services Administration's Federal Real Property Profile online system in December of each year.
3. NARA Federal Record Center Inspections are conducted as facilities are completed and commercial record centers are randomly conducted from selected approved facilities.

BFS's Internal Control Tests and Monitoring plan does not include review of contract files to ensure accuracy, timeliness, and quality of work product as is the case for BCN. The Director of BFS stated the Building Condition Report drives the work of the contracts, and is one of their key functions. The Director of BFS also stated all items/functions of BFS operations are not reviewed during internal control testing and monitoring, and are not listed in the Internal Control Test and Monitoring Plan.

Part of BCN's internal control review process is conducted utilizing a checklist to review randomly selected contracts. The Director of Acquisitions goes over the results of the checklist with the CO in order for the CO to correct or add information in the contract file. The Director of Acquisitions stated they are overwhelmed with other priorities in managing the nationwide procurement program.

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<sup>7</sup> OIG Audit Report No. 13-01, Audit of NARA's Internal Control Program

OMB Circular A-123 states management should have a clear, organized strategy with well-defined documentation processes that contain an audit trail, verifiable results, and specify document retention periods so that someone not connected with the procedures can understand the assessment process. No specific NARA guidance exists to maintain documentation supporting tests and monitoring results, however, NARA 161.7 a. (3) states all data and records in the Internal Control Program Tool is unscheduled.

We found checklists supporting the reviews of BCN contracts were not maintained.<sup>8</sup> The Director of Acquisitions was not aware of the requirement to maintain documentation supporting the reviews. Without a consistent process in place and supporting documentation, NARA cannot ensure adequate controls are in place to provide reasonable assurance program activities are operating efficiently and effectively; and reliable and timely information is obtained, maintained, recorded, and reported for decision-making.

### C. Policies, Procedures, and Training Requirements Not Up to Date

NARA's procurement policies and procedures are not current and have gaps based on OMB guidance. NARA's Procurement Guide and the Interim Guidance 506 –1 have not been updated for 9 and 14 years, respectively.

BCN management stated the policies and procedures have not been updated because the staff has been overloaded with acquisition responsibilities and was unable to update policies accordingly. NARA acquisition managers are aware the procurement guidance has not been updated since 2007 and 2001 respectively. In addition, there is no specific NARA guidance for Repairs and Restoration fund procurements or for developing the acquisition management skills of the Architectural and Engineering Workforce. BFS CO's stated they do not follow the NARA procurement guide, follow certain chapters of the FAR, and do not fall under the Director of Acquisitions.

Although program offices are a key stakeholder and primary customer in the acquisition process, no specific guidance exists on the program offices role and responsibility during the acquisition process. Without up-to-date policies and procedures, NARA management cannot ensure acquisitions and procurement functions are performed properly and in alignment with federal guidance.

Government Accountability Office (GAO) Standards for Internal Control in the Federal Government requires management to periodically review policies, procedures, and

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<sup>8</sup> BFS did not include acquisition control reviews in their Internal Control Tests and Monitoring Plan.

related control activities for continued relevance and effectiveness in achieving the entity's objectives or addressing related risks. GAO added, if there is a significant change in an entity's process, management reviews this process in a timely manner after the change to determine that the control activities are designed and implemented appropriately.

#### D. Contract Files Do Not Contain All Required Documentation

Not all documentation necessary to fully detail all aspects of each procurement was included in the contract files. This occurred because NARA did not have policies and procedures in place to sufficiently document all aspects of its procurements, nor to sufficiently monitor and review contract file documentation.

We judgmentally selected 42 of 1891 contract actions, 32 from BCN and 10 from BFS.<sup>9</sup> For each contract, we obtained the contract file from the applicable office to determine if it contained appropriate documentation. We considered contract amounts and contract description when selecting the sample. We did not select contracts done by field office CO's since those were recently audited. We selected at least five contracts from CO's with unlimited warrants and other contracts from CO's with limited warrants.

The following table shows the results of our testing for BCN:

<b>Contract File Documentation Test Results-BCN Contracts</b>	
Element of Contract File	Missing Documents
Purchase Requisition (PR)	2 of 32
Milestones or Acquisition Plan	7 of 32
Solicitation Document with Start and End Dates	1 of 32
Vendor Selection Report, Signed and Dated	3 of 32
Legal sign off on award or J&A over \$100,000	5 of 32
Award Document, Signed and Dated	0 of 32
Evidence of Capital Planning and Investment Control (CPIC) process for Information Technology (IT) investments	2 of 17 <sup>10</sup>
COR Nomination Letter	9 of 32
COR Appointment Letter	5 of 32

For BFS, we tested each contract file for appropriate documentation for 10 judgmentally selected contracts. For three of the record types, BFS did not have documentation for any

<sup>9</sup> Sample cannot be projected.

<sup>10</sup> 17 of the 32 contracts sampled were IT related.

of the 10 contracts tested. The following table shows the missing contract file documentation for all contracts tested.

<b>Contract File Documentation Test Results-BFS Contracts</b>	
Element of Contract File	Missing Documents
Purchase Requisition (PR)	0 of 10
Milestones or Acquisition Plan	10 of 10
Solicitation Document with Start and End Dates	0 of 10
Vendor Selection Report, Signed and Dated	0 of 10
Legal sign off on award or J&A over \$100,000	0 of 10
Award Document, Signed and Dated	0 of 10
Evidence of CPIC process for IT investments	Not Applicable
COR Nomination Letter	10 of 10
COR Appointment Letter	10 of 10

FAR Subpart 4.802(c) states files must be maintained at organizational levels that ensure effective documentation of contract actions; ready accessibility to principal users; minimal establishment of duplicate and working files; safeguarding of classified documents; and conformance with agency regulations for file location and maintenance. As a result of missing documents, NARA lacks an audit trail, and has no assurance its contracts were properly carried out in accordance with procurement rules and regulations. Without adequate documentation, NARA also cannot ensure its General Counsel concurs with all awards over \$100,000 as required, and its COs and Competition Advocate promoted full and open competition.

#### E. Contracts Not Awarded Timely

Based on testing of selected contracts, we also found contracts were not awarded within established timeframes. According to NARA management, multiple reasons exist for contracts not being awarded in a timely manner including short staffing in BCN, and incomplete or insufficient information provided by the program office. We determined there was also insufficient tracking of acquisition timeliness and unclear guidance and information on acquisition steps to program offices. Untimely procurement actions result in agency procurement needs not being met, or being significantly delayed, and negative impact on performance of mission-critical work.

A major objective of the acquisition process is to obtain goods and services meeting customer needs in a timely manner. Timeliness is of particular concern because it directly affects NARA's ability to meet its mission. NARA established timeframes for procurements in NARA's General Acquisition Policy, Chapter 7. According to this

policy, to ensure procurements are accomplished in a timely manner the following should occur:

- Coordinate draft key procurement request package items in conjunction with the contracting officer or assigned contract specialist before submitting the final procurement request package to the contracting officer.
- Key procurement items such as the acquisition plan, performance based statement of work, independent government cost estimate, justification and approval, and technical evaluation plan must be coordinated with the contracting officer or assigned contract specialist as early as possible in the planning cycle, preferably as they are being developed.

NARA’s procurement lead times are broken down by size of contract and type of contract, as the following table shows.

<b>Size of Contract</b>	<b>Sealed Bids</b>	<b>Competitive Negotiations</b>	<b>Sole Source</b>
\$50,000 to \$100,000	60 to 90 Days	90 to 120 Days	60 to 90 Days
\$100,000 to \$1,000,000	90 to 120 Days	120 to 145 Days	90 to 120 Days
Over \$1,000,000	120 to 145 Days	120 to 200 Days	120 to 145 Days

Simplified acquisitions have separate time frames, as established in Part II, Chapter 4, Section 4 of NARA’s Procurement Guide, as indicated below.

<b>Size</b>	<b>Contract Signed</b>
Purchases less than \$2,500	3-7 calendar days
Simple Purchases from Federal Supply Schedule	3-7 calendar days
Purchase between \$2,500 and \$25,000	3-15 calendar days
Purchase between \$25,000 and \$100,000 (requires synopsis)	15-90 calendar days

Procurement lead times<sup>11</sup> outlines expected procurement time frames and is also used by the Director of Acquisitions for monitoring CO performance. Although NARA’s Director of Acquisitions stated they used procurement lead times as performance measures, performance measures have not been established or defined to adequately track timeliness of the acquisition process.

<sup>11</sup> While procurement lead times are part of policy, the dates do not have to be met under certain circumstances described above.

We tested the procurement lead times for a sample of thirty-two BCN contracts and noted the following:

- Twenty-two met the required lead times.
- Nine<sup>12</sup> exceeded the required lead times by 27-162 calendar days.
- One did not have sufficient contract file data to determine if the contracts met the required lead times.

The procurements exceeding the lead times were awarded an average of 77 calendar days after the established deadlines. Although delayed, for various unknown reasons, the contracts were eventually awarded.<sup>13</sup>

NARA establishes deadlines for procurement actions for the end of a fiscal year and the first quarter of the following fiscal year. All Purchase Requests (PRs) and supporting documents should be submitted to BCN by the deadlines. Procurement deadlines are provided to ensure timely obligation of funds and a smooth and effective year-end close. Procurement packages received after the deadlines may not be awarded and obligated within the fiscal year (See Appendix E for deadlines). We found NARA's year end acquisition deadline notice is not enough to ensure program offices and leadership adequately plan investments so contracting professionals have enough time to follow acquisition requirements. In effect, this guidance allows programs to wait until the due date to record purchase requests. As a result, 4th quarter transactions increased 393 percent from the average of the first three quarters for FY 2012 through FY 2014.

In addition to timeliness testing above, we surveyed NARA staff to determine if the participant had experienced any issues or problems, or if there were any concerns, with the procurement process (e.g. delays). Ten of the 13 respondents described at least some experience with procurement delays.<sup>14</sup>

As an example, in 2014, a NARA program office sought to purchase an off-the-shelf commercial product. The price of the product fell into the simplified acquisitions procedures (SAP) threshold, and funds for the purchase were available. Based on the type and price of the procurement, the contract should have been signed between three

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<sup>12</sup> Of the nine contracts not awarded timely, seven were competitive negotiations (at least one in all three contract size thresholds), one was Trust Fund Not Competed and one was Other than Full and Open Competition.

<sup>13</sup> We did not assess the quality of each contract or procurement action in this audit. Reasons for delay could be related to poorly written requirements, complete procurement request package not submitted, lack of funding, or workload of COs.

<sup>14</sup> We surveyed 13 key program offices or positions. Not all responded and three key programs sent in more than one response.

and fifteen calendar days from the receipt of the purchase request. However, the contract was not signed and awarded within the threshold established. The purchase requisition was submitted to program office management, where the document was delayed in its approval. Once approved, the program office submitted the purchase requisition to BCN, and based on the SAP threshold for contract signature, should have been signed within fifteen days by a CO. However, delays in BCN caused the contract to be signed and awarded after the required date. Further, incorrect administrative information was entered on the signed contract, which required a contract modification further delaying the procurement. The product was received and ready for use five months after completion of the original purchase requisition. Timely and accurate procurement would have significantly reduced the amount of time it took the program office to receive the needed product.

In reference to the example above, the Director of Acquisitions indicated the PRs are assigned to the CO. Program Offices are not submitting complete packages to BCN, therefore BCN COs are working more and more with the program office staff to complete the necessary requirements. As previously mentioned, NARA Policy does not describe program offices role and responsibilities.

During our audit, BCN provided a list of 1,172 contract actions to be closed from contracts established between 1999 and 2015. Between February 2015 and December 2015, BCN closed 1,125 contract actions.<sup>15</sup> NARA made significant progress in closing out contract actions. However, 193 contract actions remain to be closed including 146 contract actions added to the list as of December 2015. The 193 contract actions to be closed are from contracts established between 2000 and 2012. The Director of Acquisitions has appointed a staff member to close out contracts on the list. There is an increased risk of funds remaining idle on contracts that are not closed timely. Idle funds, if de-obligated, could have been used for other projects, or to pay expenditures on other applicable contracts.

F. Acquisition Workload Not Proportionate to Staff Levels.

The Director of Acquisitions does not have a deputy or other assigned staff to fulfill key duties. Currently, the Director of Acquisitions is supervising COs, contract specialists, management analyst and procurement clerks (16 people), conducting workshops, conducting weekly meetings with COs, advising on each contract, doing administrative and personnel tasks, procurement reporting, internal control reporting, researching laws, writing policy, reviewing new clauses, and ratifying contracts. In addition, the Director of Acquisitions is also acting as the Acquisition Career Manager (ACM), working on

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<sup>15</sup> We did not assess the quality of each contract or procurement action.

PRISM issues, running purchase request and commitment reports, tracking cancelled and closed PRs, and reviewing compliance reports. Attempting to fulfill all of these other responsibilities in conjunction with fulfilling required duties leaves less time for collaborating and improving the effectiveness of NARA's procurement program. As a result NARA cannot ensure contracts are being adequately processed, awarded, monitored, and closed in a timely manner to meet agency needs.

According to the Director of Acquisitions, BCN currently has 16 filled positions, and a need exists to fill other valuable positions due to recent vacancies. A hiring freeze was instituted NARA-wide in November 2011 to prepare for impending sequestration. Also according to the Director of Acquisitions, there have been positive responses from management on exception requests, however positions remain vacant. As the Director of Acquisitions attempts to fulfill multiple roles, NARA cannot ensure the Director of Acquisitions is performing at the fullest potential and managing the acquisition branch as intended by NARA's leadership and the FAR.

We reviewed NARA's acquisitions for FY 2014 to determine the dollar value and number of contracts assigned to each CO within BCN. During FY 2014 the total value of active contract actions including option years totaled \$1,093,892,169.05, obligation amounts totaled \$196,875,869.51 consisting of 1,891 contract actions. There were instances in which BCN COs were assigned over 200 contract actions.

As an example, we found a contracting officer with an unlimited warrant is responsible for most of NARA's IT contracts. This CO awarded over 220 contracts, with active contract actions totaling over \$400 million, in FY 2014. The volume of contracts assigned to one individual may potentially leave little time to ensure performance of all necessary actions for effective contracting, ensure compliance with the terms of the contract, and safeguard the interests of the United States in its contractual relationships as required by FAR 1.602-2.

GAO Standards for Internal Control in the Federal Government states management is responsible for evaluating pressure on personnel to help personnel fulfill their assigned responsibilities in accordance with the entity's standards of conduct. Management can adjust excessive pressures using many different tools, such as rebalancing workloads or increasing resource levels.

## **Recommendations**

We recommend the following to improve NARA's Acquisition structure and process.

**Recommendation 8:** CAO, in collaboration with CFO, Director of Acquisitions, and program managers, develop and implement procedures for proper planning of new contracts with NARA funds.



Management Response

NARA verbally concurs with this recommendation.

OIG Analysis

Until management decision is reached and the OIG receives NARA's formal written response, we consider this recommendation unresolved and open.

**Recommendation 9:** CAO develop and implement procedures to ensure contracts are evaluated to identify contracts that are wasteful, inefficient, or unlikely to meet NARA needs.

Management Response

NARA verbally concurs with this recommendation.

OIG Analysis

Until management decision is reached and the OIG receives NARA's formal written response, we consider this recommendation unresolved and open.

**Recommendation 10:** CAO and SPE develop and implement test plans and procedures to assess internal control over acquisition activities and programs using OMB Memorandum, *Conducting Acquisition Assessments*.

Management Response

NARA verbally concurs with this recommendation.

OIG Analysis

Until management decision is reached and the OIG receives NARA's formal written response, we consider this recommendation unresolved and open.

**Recommendation 11:** CAO modify procedures to ensure all contracting activity, including Architecture/ Engineering, construction services are included in random selections for internal control reviews.

Management Response

NARA verbally concurs with this recommendation.

OIG Analysis

Until management decision is reached and the OIG receives NARA's formal written response, we consider this recommendation unresolved and open.

**Recommendation 12:** CAO establish standards for retaining documentation supporting the evaluation of internal controls.

Management Response

NARA verbally concurs with this recommendation.

OIG Analysis

Until management decision is reached and the OIG receives NARA's formal written response, we consider this recommendation unresolved and open.

**Recommendation 13:** CAO include CO's who are not GS1102's, COR's and P/PM's in the internal control program test plan.

Management Response

NARA verbally concurs with this recommendation.

OIG Analysis

Until management decision is reached and the OIG receives NARA's formal written response, we consider this recommendation unresolved and open.

**Recommendation 14:** CAO include CO's who are not GS1102's, COR's and P/PM's in the internal control program test plan.

Management Response

NARA verbally concurs with this recommendation.

OIG Analysis

Until management decision is reached and the OIG receives NARA's formal written response, we consider this recommendation unresolved and open.

**Recommendation 15:** CAO develop and implement meaningful and measurable performance metrics to continually assess the performance of the acquisition function in supporting NARA's mission and achieving acquisition goals.

Management Response

NARA verbally concurs with this recommendation.

OIG Analysis

Until management decision is reached and the OIG receives NARA's formal written response, we consider this recommendation unresolved and open.

**Recommendation 16:** CAO ensure NARA 501 NARA Procurement policy include guidance to program offices on their responsibilities in the procurement process.

Management Response

NARA verbally concurs with this recommendation.

OIG Analysis

Until management decision is reached and the OIG receives NARA's formal written response, we consider this recommendation unresolved and open.

**Recommendation 17:** CAO ensure program offices are routinely trained in NARA procurement policy and procedures, specifically procurements requisition packages and procurement lead times.

Management Response

NARA verbally concurs with this recommendation.

OIG Analysis

Until management decision is reached and the OIG receives NARA's formal written response, we consider this recommendation unresolved and open.

**Recommendation 18:** CAO assess staffing needs for NARA's Procurement Program to ensure the procurement program has sufficient staff to maintain effective, efficient operations and adhere to Federal and internal guidance.

Management Response

NARA verbally concurs with this recommendation.

OIG Analysis

Until management decision is reached and the OIG receives NARA's formal written response, we consider this recommendation unresolved and open.

**Recommendation 19:** CAO develop a process to monitor the close-out of contracts process to ensure contracts are closed in a timely manner and identify reasons contracts are not closed out in a timely manner.

Management Response

NARA verbally concurs with this recommendation.

OIG Analysis

Until management decision is reached and the OIG receives NARA's formal written response, we consider this recommendation unresolved and open.

**Finding 3. NARA Lacks Controls over Acquisition Workforce Training and Certifications**

NARA's Contracting personnel are not trained commensurate with their warrant authority or COR oversight levels; training is not adequately tracked; and Program and Project Management certifications are not properly approved. NARA's management is not providing the level of oversight required to ensure appropriate training is occurring. Federal Acquisition Certification is founded on core competencies considered essential for successful contracting, education, and experience requirements. The quality and effectiveness of the federal acquisition process depends on the development of a capable and competent workforce. Without adequate training and oversight, NARA cannot ensure its acquisition workforce has the competencies necessary to adequately identify needs, develop requirements, perform contracting and purchasing, and oversee contracts for the agency.

A. Contracting Personnel Not Trained Commensurate with Warrant/Oversight levels

*BCN CO's*

We reviewed warrants, appointment letters, FAC-C certifications, and training certificates for eight BCN CO's and found three were not FAC-C certified as required by the Office of Federal Procurement Policy (OFPP) and/or NARA policy based on their warrant levels; four did not receive 80 hours of continuous learning hours as required in OMB's FAC-C Program, including one who has not had training since December 2008 and another who has not had training since April 2011 (See Appendix D). This occurred because NARA policy related to CO training requirements has not been updated to reflect OMB guidance since 2011. Without the appropriate levels of training and certification, NARA lacks assurance their CO's are proficient, up to date with new regulations and best practices, and remain qualified to carry out duties and responsibilities.

OMB issued requirements for the Federal Acquisition Certification in Contracting (FAC-C), Contracting Officer's Representative (FAC-COR) and Program and Project Managers (FAC-P/PM). OMB also states these selections and appointments shall be consistent with OFPP's standards for skill-based training in performing contracting and purchasing duties as published in OFPP Policy Letter No. 05-01, Developing and Managing the Acquisition Workforce, April 15, 2005. Agencies and individuals are responsible for maintaining certification supporting documentation for quality assurance purposes. All contracting professionals were required to be registered in Federal Acquisition Institute Training Application System (FAITAS)<sup>16</sup> by January 1, 2014. To maintain a FAC-C,

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<sup>16</sup> FAITAS is an integrated and Government-wide acquisition workforce career management system for all civilian agencies and will support the FAC-COR program. CORs are responsible for maintaining certification documentation for quality assurance purposes. FAI is responsible for managing FAITAS and will continue to issue guidance, as necessary, to support FAITAS implementation. More information regarding FAITAS can be found at [www.fai.gov](http://www.fai.gov).

acquisition professionals are required to earn 80 continuous learning points (CLPs) of skills currency training every two years beginning October 1, 2007.

OMB Memorandum, The Federal Acquisition Certification in Contracting Program, dated January 20, 2006, states members of the workforce issued new Contracting Officer (CO) warrants on or after January 1, 2007, regardless of GS series, must be certified at an appropriate level to support their warrant obligations, pursuant to agency policy. However agencies are encouraged to require a senior level certification for any employee issued an unlimited Contracting Officer's warrant on or after January 1, 2007. The certification process, including verification and assessment of applications, will be managed by each agency. Authority for overseeing the agency FAC-C program, resolving disputes, and granting certifications shall be at the Senior Procurement Executive level. The SPE may delegate, in writing, certain functions to a level no lower than the Acquisition Career Manager, as needed, to ensure effective and efficient management of the program. OMB Memorandum, Revisions to the Federal Acquisition Certification in Contracting (FAC-C), dated May 7, 2014, requires contracting officers, regardless of their series, and other contracting professionals in the 1102 job series must be certified at an appropriate level as of October 1, 2014.

Since the CAO left in July 2015, the FAC certification form has not been updated with another authorizing signature. The position title under the CAO's signature line is SPE. However a SPE has not been formally designated as previously mentioned. The CAO and ACM are not providing the level of oversight required for FAC-C implementation.

As an example, management established expectations of competence for a particular CO with significant procurement authority, dated May 2011. However, one CO did not complete required training and was not FAC-C level certified as of March 2015 during our testing of training files. Previously, in September 2011, the Director of Acquisitions denied the contracting officers request for FAC-C level I or II Certification due to the CO not completing required courses. Although the same CO did not meet all the mandatory training requirements the Director of Acquisitions determined they possessed significant potential for advancement to levels of greater responsibility and authority, based on their education, experience, work performance, and other criteria, and approved a conditional 24 month waiver of the FAC-C Level I and Level II training requirements so that the CO's warrant may be issued. The Director of Acquisitions also established and provided expectations of competencies needed for the CO to receive FAC-C certification. The CO still did not complete the required courses during the conditional 24-month period due to workload priorities and training being cancelled by the supervisor.

Although the CO did not complete the required courses initially, or during the conditional period, the Director of Acquisitions increased the contracting officer's warrant with

unlimited procurement authority in January 2014. However, because the contingencies to obtain required training were not met, the discretion to issue warrants pending FAC-C certification should not have been waived repeatedly. The CO did not complete the last course to meet FAC-C Level 1 requirements until May 2014 (3 years later) and received their FAC-C Level 1 certification on November 2, 2015. Prior to receiving their certification, the CO awarded contracts obligating over \$75 million in FY 2014.

OMB Memorandum, the Federal Acquisition Certification in Contracting Program, dated January 20, 2006, stated members of the workforce issued new Contracting Officer warrants on or after January 1, 2007, regardless of GS series, must be certified at an appropriate level to support their warrant obligations, pursuant to agency policy. In addition OMB states the SPE of a civilian agency may waive the requirements for obtaining a certification for warranting purposes in writing, on a case-by-case basis, if granting a waiver is in the best interest of the agency. This authority may not be delegated, and the use of this authority shall be adequately documented.

NARA Interim Guidance 506, dated August 2011, states CO's and GS- 13 or above with a warrant up to \$50,000,000 should be FAC-C Level III certified. Employees who do not hold current FAC-C certificates must complete the 80 CLP requirements prior to issuance of a warrant at the discretion of BA [now BCN]; warrants may be issued pending FAC-C Certification at the discretion of BA [now BCN].

OMB Memorandum, Revisions to the Federal Acquisition Certification in Contracting (FAC-C), dated May 7, 2014, requires contracting officers, regardless of their series, and other contracting professionals in the 1102 job series to be certified at an appropriate level as of October 1, 2014. Those CO's not required to be certified under the previous policy shall be given a period of two years to complete their certification requirements. The intent of OMB guidance is not to continue waiving requirements for certification or continuous training if requirements have not been met.

#### *Architecture/Engineering and Construction COs*

We found NARA does not have existing policy to ensure Architecture/Engineering and Construction COs are FAC-C certified by October 1, 2016. This occurred because the CAO did not effectively support the ACM in managing NARA's acquisition workforce, including establishing policies and procedures for education, training, and career development. Without the appropriate levels of leadership and CO training and certification, NARA lacks assurance their COs are proficient and remain qualified to carry out their duties and responsibilities.

OMB Memorandum, Revisions to the Federal Acquisition Certification in Contracting (FAC-C), dated May 7, 2014, states contracting officers, regardless of their series, must be certified at an appropriate level as of October 1, 2014. Those COs not required to be certified under the previous policy shall be given a period of two years to complete their certification requirements.

We reviewed the warrants, appointment letters and training certificates for two BFS CO's. One CO was previously grandfathered in under OMB Policy Letter 05-01 which states members of the workforce issued new CO warrants on or after January 1, 2007 must be certified at an appropriate level to support their warrant obligations. This CO's warrant was originally issued prior to 2007. However, under OMB's May 7, 2014 Memo, by October 1, 2016 the Architecture/Engineering and Construction COs should be FAC-C certified based on their warrant level. A senior NARA official, who was also a BFS CO with unlimited procurement authority, was not aware of the OMB requirements from May 2014 for all CO's not required to be certified under the previous policy to be given a period of two years to complete their certification requirements.

#### *Information Technology COs*

Although NARA awarded at least \$69.8 million related to IT<sup>17</sup> acquisitions in FY 2014, BCN does not have any CO's who are considered technology acquisition cadre members. Appropriate management and oversight controls were not in place to ensure CO's working significantly on IT contracts received adequate IT acquisition training consistent with OMB guidance. OMB Memorandum, Guidance for Specialized Information Technology Cadres, dated July 13, 2011, states because contracting professionals, PMs, and CORs have continuous learning requirements to keep their core certifications current, there are many opportunities for technology acquisition cadre members to gain these specialized skills and knowledge through training, experience, and developmental assignments.

Generally, cadre members must be certified first in their core functional area, such as the FAC programs; and can then pursue additional training, experience, or developmental activities in a specialized area as part of their continuous learning efforts. OMB recommends IT acquisition cadre members spend a minimum of 50% of their CLP requirements getting trained or developed in the IT specialized area (after achieving the minimum level of functional expertise or certification required for their position). Without specialized IT contracting officers, NARA lacks assurance sound agency-

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<sup>17</sup> Based on data from FPDS which excludes purchase cards, freight, interagency agreements, grants and trust fund transactions, some of which may be IT related.

specific requirements and established acquisition strategies exist to achieve the best value for tax payer dollars.

*Contracting Officer's Representative (CORs) Certification Program*

NARA does not have a FAC-COR certification program in place in accordance with OMB policy. Current NARA guidance refers CORs to outdated mandatory refresher course requirements. OMB Memorandum, *Revisions to the Federal Acquisition Certification for Contracting Officer's Representatives* (FAC-COR), dated September 6, 2011, requires CORs to meet minimum training and experience requirements, and maintain their skills through continuous learning. FAC-COR certification is recognized as evidence an employee meets core training and experience requirements to perform COR functions. The CAO, in consultation with the SPE and other appropriate agency officials, is responsible for developing and maintaining an acquisition career management program to ensure an adequate professional workforce. As such, the certification process shall be managed by each agency. The agency ACM<sup>18</sup> is responsible for administering the agency FAC-COR certification program. However, NARA's CAO has not implemented a FAC-COR certification program. NARA's CORs are not FAC-COR certified, and may not meet current OMB policy announced nearly five years ago.

This occurred because the CAO did not effectively support the ACM in providing adequate oversight to ensure COR training guidance is up to date. For example, there is a discrepancy between NARA guidance and OMB FAC-COR guidance. NARA's current procurement guide, Chapter 10, Section 3.15 states CORs must complete mandatory refresher courses every three years, whereas OMB guidance requires FAC-CORs to complete CLPs every two years. The Director of Acquisitions is aware the Procurement Guide is outdated and has developed a draft FAC-COR handbook which was provided to the CFO for review in March 2015. However, to date, the guidance has not been approved. Without an approved policy, the Director of Acquisitions will not authorize the use of FAITAS for CORs which will impact the ACM's ability to communicate with CORs, and tracking CORs training and certifications to ensure CORs maintain professional proficiency and remain qualified to perform their duties.

B. Acquisition Training Not Adequately Tracked and Documented

NARA is not effectively tracking its CO and COR workforce and their continuous learning requirements. NARA has not developed appropriate guidance and oversight for the acquisition workforce training and certifications. Without accurate knowledge of completed and documented training or continuous learning activities, NARA lacks

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<sup>18</sup> NARA's ACM is the Director of Acquisitions.



assurance contracting personnel maintain professional proficiency and remain qualified in conducting their contracting duties.

OMB Memorandum, Revisions to the Federal Acquisition Certification in Contracting (FAC-C), dated May 7, 2014, states accounting for and documenting continuous learning activities are mutual responsibilities between the acquisition workforce member, supervisor and ACM. Further, OMB Memorandum, Revisions to the Federal Acquisition Certification for Contracting Officer's Representatives, dated September 6, 2011, states agencies and individuals are responsible for maintaining certification documentation for quality assurance purposes.

### *Contracting Personnel Training*

We found the CO training files kept by the ACM were not complete. The Director of Acquisitions stated training certifications are not tracked due to the implementation of FAITAS in 2014 at NARA, other contract related priorities, and lack of staff to assist in managing training data. According to the Director, six vacancies in the Acquisitions Branch make it difficult to ensure all training and certifications are up-to-date. As an example, the previous Deputy Director of Acquisitions who assisted with monitoring the training of COs and CORs left NARA and the Deputy Director position remains unfilled due in part to a hiring freeze from November 2011 to February 2015. The associated responsibilities have not been reassigned. The Director also stated they cannot view training and certification data in FAITAS for NARA COs, making it more difficult to oversee training. COs print their record of training from FAITAS for the Director of Acquisitions to review.

We also found the ACM's process of tracking FAC-COR certifications and training taken by all CORs is not efficient or effective. The Director of Acquisitions was unable to provide a complete list of CORs, COR level, or COR training. Communication to CORs is not centralized by the ACM, rather individual COs work with CORs to ensure training is met. By not ensuring training is adequately documented, NARA cannot show all contracting personnel maintain professional proficiency and remain qualified to carry out their duties.

OMB Memorandum, Revisions to the Federal Acquisition Certification in Contracting (FAC-C), dated May 7, 2014, states accounting for and documenting continuous learning activities are mutual responsibilities between the acquisition workforce member, supervisor and ACM. Further, OMB Memorandum, Revisions to the Federal Acquisition Certification for Contracting Officer's Representatives, dated September 6, 2011, states agencies and individuals are responsible for maintaining certification documentation for

quality assurance purposes. Agencies are responsible for tracking their COR workforce, including its continuous learning requirements. ACMs shall monitor the continuous learning requirements for employees holding FAC-COR certifications to ensure they meet these requirements. OMB Memorandum, Increasing Efficiencies in the Training, Development, and Management of the Acquisition Workforce, September 3, 2013 encourages small agencies to use FAITAS to manage their acquisition workforce members.

BCN, BFS, and Exhibits Program Office provided names of twenty-one known CORs.<sup>19</sup> Our review of NARA's contracting officer representative (CORs) documentation for their COR positions determined three CORs have no record of initial COR training, and seven CORs were not in compliance with NARA's requirement for a refresher course every three years, let alone OMB's requirement for a refresher course every two years.

### C. Program and Project Managers Certification Not Approved

We found Program and Project Management certifications are not properly approved in accordance with NARA policy. Three of six NARA Certification for Program and Project Managers Applications reviewed did not have the signature of the Deputy Archivist, who is the final approver. Although NARA's guidance for approval of Program and Project Managers certification exists, NARA did not follow its requirements. According to management, this was most likely an oversight as the Deputy Archivist has never declined to sign any FAC-P/PM applications for certification. Management contends that the applications were likely not sent to the Deputy Archivist or the signed copies were not filed. Without the required approving official signature, NARA's Program and Project Managers may not be FAC-P/PM certified which jeopardizes NARA's ability to perform contract work.

NARA's Interim Guidance 810-2, Implementation of Federal Acquisition Certification for Program and Project Managers (FAC-P/PM) established a control whereby the Deputy Archivist is to approve certification packages or issue waivers, with recommendations by the Chief Information Officer and the Director of Acquisitions. The Project Assistance Division Director stated the ACM's signature makes the person FAC-P/PM certified, not the Deputy Archivist's signature.

## **Recommendations**

We recommend the following to improve NARA's Acquisition structure and process.

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<sup>19</sup> The Director of Acquisitions was unable to provide a complete list of COR's, COR level, or COR training.

**Recommendation 20:** ACM verify all contracting officers, contracting officer representatives, program and project managers, and other contracting professionals set up an account in FAITAS for tracking certifications and continuous training.

Management Response

NARA verbally concurs with this recommendation.

OIG Analysis

Until management decision is reached and the OIG receives NARA's formal written response, we consider this recommendation unresolved and open.

**Recommendation 21:** ACM continue to work with the Federal Acquisition Institute to get access to all NARA staff accounts in FAITAS. If the ACM is unable to obtain direct access to NARA staff accounts, the ACM should develop and implement a tracking system to document and monitor training for all contracting officers, contracting officer representatives, program and project managers, and other contracting professionals ensuring compliance with the Federal Acquisition Certification.

Management Response

NARA verbally concurs with this recommendation.

OIG Analysis

Until management decision is reached and the OIG receives NARA's formal written response, we consider this recommendation unresolved and open.

**Recommendation 22:** CAO work with the CIO to determine and document how best to support IT acquisition, such as through the development of specialized IT acquisition cadres, specifically contracting officers, and staff.

Management Response

NARA verbally concurs with this recommendation.

OIG Analysis

Until management decision is reached and the OIG receives NARA's formal written response, we consider this recommendation unresolved and open.

**Recommendation 23:** ACM ensure NARA Certification for Program and Project Managers Applications are signed by the Deputy Archivist in accordance with NARA policy and maintained.

Management Response

NARA verbally concurs with this recommendation.

OIG Analysis

Until management decision is reached and the OIG receives NARA's formal written response, we consider this recommendation unresolved and open.

**Recommendation 24:** CAO ensure all contracting officers, regardless of their government series, be certified at an appropriate level; and any contracting professional issued an unlimited warrant be level III certified.

Management Response

NARA verbally concurs with this recommendation.

OIG Analysis

Until management decision is reached and the OIG receives NARA's formal written response, we consider this recommendation unresolved and open.

**Recommendation 25:** CAO establish and implement procedures for potential administrative or disciplinary actions for contracting officers, and contracting officer representatives, and other contracting professionals that do not have their FAC certifications or continuous trainings required by OMB guidance. For example, if after one year from notice the contracting professional still does not have appropriate certificates and/or training, disciplinary action, removal of warrant or removal from the position may occur.

Management Response

NARA verbally concurs with this recommendation.

OIG Analysis

Until management decision is reached and the OIG receives NARA's formal written response, we consider this recommendation unresolved and open.

**Recommendation 26:** CAO ensure there is more IT training for CO's that do a significant amount of work in IT in accordance with OMB technology acquisition cadre guidance.

Management Response

NARA verbally concurs with this recommendation.

OIG Analysis

Until management decision is reached and the OIG receives NARA's formal written response, we consider this recommendation unresolved and open.

## **Appendix A – Future Procurement Audits**

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Based upon the findings of this report and an assessment of risk, we plan to conduct future audits in the following procurement-related areas:

- Contract Modifications
- Contracts Awarded through other than full and open competition
- Contract Closeout Processes
- Use of GSA products, services and initiatives such as Cloud IT Services, Agile BPA's on digital services
- Emergency Acquisitions
- IDIQ work
- Temporary Contracts
- Verification of External Procurement Reporting
- COR Activities
- PRISM Functions and Use

## Appendix B – Related Prior Year Recommendations

<b>Audit and Recommendation Number</b>	
<b>14-05 Audit of NARA’s Field Offices Acquisition Activity</b>	<b>Closed Subsumed in recommendation 21 of this report</b>
1. (a) Establish and implement a tracking system to document and monitor training for all contracting officers ensuring compliance with the Federal Acquisition Certification in contracting policy memorandum; and (b) consider terminating field office contracting officer’s warrants until all initial training requirements are met.	<b>Closed Subsumed in recommendation 19 of this report</b>
2. Ensure all field COs and buyers are adequately trained on how and when to close out NARA contracts. Additionally, periodic monitoring and testing of closeout procedures should be conducted to ensure contracts are closed out timely.	<b>Open</b>
3. Establish and implement a formal, documented process for informing the field office support team of field office contracts requiring review prior to award.	<b>Open</b>
4. Update NARA policies to ensure the guidance for approval of small disadvantaged business utilization exceptions is consistent.	
<b>14-08 Audit of NARA’s Capital Planning and Investment Control (CPIC) Process</b>	<b>Open</b>
1. Ensure NARA’s documented CPIC policy is updated and formalized to reflect the current processes in use by NARA. This includes: <ul style="list-style-type: none"> <li>a. Ensuring any changes to NARA’s CPIC policy are promulgated in the form of a NARA notice and published on the NARA@Work intranet site.</li> <li>b. Ensuring all required CPIC related documentation is completed for all NARA IT investments going through the CPIC process.</li> <li>c. Requiring the creation and use of a checklist outlining the IT governance related documentation required to be completed for all IT investments going through the CPIC process.</li> </ul>	<b>Open</b>
2. Require NARA’s updated CPIC policies and procedures meet the CPIC process requirements detailed in the Clinger Cohen Act.	<b>Open</b>
3. We recommend NARA’s Chief Operating Officer (COO) ensure	<b>Closed</b>

NARA IT investments do not bypass NARA's CPIC process.	
4. NARA's Chief Operating Officer to ensure that I-P's approval process in PRISM is updated to include business object code 257102.	<b>Open</b>
5. NARA's Chief Operating Officer ensure that I-P maintain documentation of its approval of IT investments in PRISM and I-P's PRISM approval of IT investments is tested on an annual basis with all documentation of this testing sent to NARA's internal controls group.	<b>Open</b>
6. NARA's Chief Operating Officer ensure the training guide for purchase card holders is updated to include a discussion of the requirements of NARA's CPIC process.	<b>Closed</b>
7. NARA's Chief Information Officer distributes a NARA Notice annually to remind employees of their CPIC responsibilities related to the acquisition of IT investments.	<b>Open</b>
8. We recommend NARA's Chief Information Officer ensure NARA's IT governance process, which includes CPIC, incorporates the lessons learned when Directive 801 was followed to create a more user-friendly, streamlined and transparent policy where CPIC requirements align closely with the costs of IT investments.	<b>Open</b>
9. We recommend NARA's Chief Operating Officer consider including an enforcement mechanism in any updates to NARA's CPIC policy.	
<b>10-05 Audit of NARA's Contract for Information Technology and Telecommunications Support Services</b>	<b>Closed</b>
2. The Director, Acquisitions Services Division (NAA) should, for future procurements involving a T&M contract, ensure that contracting personnel comply with the FAR requirement that a "Determination and Findings" be prepared. The D&F should: (a) include a description of the market research conducted; (b) establish that it is not possible at the time of placing the contract or order to accurately estimate the extent or duration of the work or to anticipate costs with any reasonable degree of certainty; (c) establish that the requirement has been structured to maximize the use of FFP contracts on future acquisitions for the same or similar requirements; and (d) describe actions planned to maximize the use of FFP or fixed-price with economic price adjustment contracts on future acquisitions for the same requirements.	

## Appendix C – Key Responsibilities of CAOs

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### **NARA 101, Section 12. Chief Acquisition Officer**

a. Execute the duties enumerated for agency Chief Acquisition Officers in the Services Acquisition Reform Act of 2003 (Title XIV of Public Law 108-136, 41 U.S.C. 1702). This authority is delegated from the Archivist of the United States to the Chief Acquisition Officer.

- (1) Advise and assist the Archivist of the United States in establishing the appropriate business strategies to achieve the NARA mission.
- (2) Monitor the performance of NARA acquisition activities and programs, and evaluate the performance of those programs using appropriate performance measurements;
- (3) Establish policies, procedures, and practices that increase the use of full and open competition in the acquisition of property and services by NARA;
- (4) Increase appropriate use of performance-based contracting and performance specifications in NARA acquisition activities;
- (5) Make acquisition decisions, consistent with all applicable laws and establish clear lines of authority, accountability, and establish clear lines of responsibility for acquisition decision-making within NARA;
- (6) Manage NARA acquisition policy, including implementation of any unique acquisition policies, regulations, and standards applicable to NARA.
- (7) Develop and maintain a NARA acquisition career management program to ensure that NARA has an adequate professional workforce; and
- (8) Ensure the appropriate and strategic planning and evaluation of NARA acquisition resources, including:
  - (a) Assessing the requirements established for agency personnel regarding knowledge and skill in acquisition resources management and the adequacy of those requirements for facilitating the achievement of the performance goals established for acquisition management;
  - (b) If necessary, developing strategies and specific plans for hiring, training, and professional development to rectify a deficiency in meeting those requirements; and
  - (c) Reporting to the Archivist of the United States on the progress made in improving acquisition management capability.
- (9) Perform any additional duties that are assigned to agency Chief Acquisition Officers by law or regulation.

b. In addition to the above responsibilities, the following delegations of authority are made by the Archivist of the United States to the Chief Acquisition Officer:

- (1) Designate the NARA Senior Procurement Executive, who will report directly to the Chief Acquisition Officer without any intervening authority (41 U.S.C. 1702(c)).
- (2) Designate the NARA Competition Advocate, who will be responsible for promoting full and open competition, promoting the acquisition of commercial items, and challenging barriers to such acquisitions (41 U.S.C. 1705).
- (3) Exercise all duties, responsibilities, and powers related to the procurement of property or services and assigned to the Archivist of the United States or the “executive agency” in Division C of Title 41, U.S.C. These authorities are delegated pursuant to 41 U.S.C. 3102.
- (4) Carry out all powers, functions, and duties of the Archivist of the United States regarding the establishment of an acquisition and contracting training program and succession planning activities for the NARA acquisition workforce (41 U.S.C. 1704).



## Appendix D – Contracting Officer Warrant Limits and FAC-C Certification Levels

BCN COs	Warrant Limit and Effective Date	FAC-C Certification Level	Continuous Training Met
1	Unlimited warrant for purchase of supplies, services and equipment, 2011	FAC-C III, 2011 and 2015	Yes
2	Unlimited, 2014	FAC-C I, 2015 *	Yes
3	Unlimited warrant for purchase of supplies, services and equipment, 2013	FAC-C III, 2008	Yes
4	Unlimited warrant for purchase of supplies, services and equipment, 2013	FAC-C III, 2014	Yes
5	\$1,000,000 for all purchases of supplies, services, and equipment, 2011	Not FAC-C Certified **	No
6	\$250,000 for all purchases of supplies, services, and equipment, 2011	FAC-C II, 2015 ***	Yes
7	\$15,000,000 for full procurement authority, 2008	Not FAC-C Certified **	No
8	\$100,000,000 for the purchase of supplies, services, and equipment, 2014	FAC-C II, 2015	Yes
BFS COs	Warrant Limit and Effective Date	FAC-C Certification Level	Continuous Training Met
9	Unlimited procurement authority for construction, renovation and architect/engineering services, 2002	Not FAC-C certified - has until September 30, 2016 to become FAC-C level III certified	Yes
10	\$25,000 for open market commercial item purchases and GSA Federal Supply Delivery orders of supplies, equipment and services, 2010	Not FAC-C Certified (however has training to satisfy FAC-C level I)	Yes

\* CO should be FAC-C level III based on unlimited warrant.

\*\* CO should be FAC-C level II based on warrant amount and at time of warrant.

\*\*\* CO should have been FAC-C certified at time of warrant in 2011

## Appendix E – NARA Acquisitions Deadlines

### FY 2014 and FY 2015 Acquisitions Deadlines Deadlines for FY 2014 Acquisition Packages

Deadline	Acquisition Type
May 30	For any acquisition requirements not addressed below, please submit a complete procurement package, including a PRISM Purchase Request (PR).
	<b>Services, Open Market Competition (greater than \$25,000):</b> Please submit a complete procurement package for all open market purchases for services exceeding \$25,000.
June 20	<b>Services, Open Market Competition (less than or equal to \$25,000):</b> Please submit a complete procurement package for all open market purchases for services up \$25,000.
	<b>Services, using GSA Schedule (FSS) or GWAC:</b> Please submit a complete procurement package for all GSA FSS and Government-Wide Acquisition Contract (GWAC) purchases requiring source selection.
June 27	<b>Products or Services, using Interagency Agreements (IAAs):</b> Please submit a complete procurement package for all IAAs, including options and new agreements.
July 25	<b>Products, using GSA Schedule (FSS) or Open Market Competition:</b> Please submit a complete procurement package for all other acquisitions, including equipment and supply purchases off GSA Schedules.
	<b>All Other Acquisitions between \$3,000 and \$25,000:</b> Please submit a complete procurement package for all acquisitions greater than \$3,000 and less than or equal to \$25,000. Only forward requisitions after making advance arrangements with the Acquisition Services.

### Appendix E, NARA Acquisitions Deadlines, continued

#### Additional Guidance for FY 2014 Acquisition Packages:

1. All PRISM PRs for new awards, adding funds to existing awards, and all other PR packages must be submitted to the Acquisitions Branch (BCN) by the deadlines above.
2. PRs that add funds to an existing award or request a new award must be submitted as a new PRISM PR, not a Request for Modification.

3. All PRs must be routed through the Office of Budget (BCB).
4. All PRs for IT hardware and software must be approved by Information Services. The IT product/project plan or business case and IT Checklist must be attached to the PR and submitted through PRISM by the appropriate deadline.

**Deadlines for first quarter FY 2015 Acquisition Packages**

Deadline	Acquisition Type
July 18	<b>FY 2015 Exercise of Options:</b> Please submit a complete procurement package for all contract options that must be exercised in the first quarter FY 2015 (October 1 – December 31, 2014).
July 25	<b>Utility Awards:</b> Please submit a complete procurement package for all FY 2015 utility awards that start in October 2014.

**Additional Guidance for FY 2015 Acquisition Packages:**

1. FY 2015 PRs cannot be entered into PRISM until June. Requesting offices are encouraged to submit packages for complex procurements to BCN before June and then follow-up with an FY 2015 PRISM PR after June.
2. All FY 2015 PRs adding funds to an existing award must be submitted as a new PRISM PR, not a Request for Modification.

## Appendix F – Acronyms and Abbreviations

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ACM	Acquisition Career Manager
BCN	Acquisitions Branch
BFS	Space Planning and Projects Branch
CAO	Chief Acquisition Officer
CFO	Chief Financial Officer
CIO	Chief Information Officer
CLP	Continuous Learning Points
CO	Contracting Officer
COR	Contracting Officer Representative
COSO	Committee of Sponsoring Organization of the Treadway Commission
CPIC	Capital Planning and Investment Control
FAC-C	Federal Acquisition Certification in Contracting
FAC-COR	Federal Acquisition Certification for Contracting Officer's Representative
FAC-P/PM	Federal Acquisition Certification for Program and Project Managers
FAITAS	Federal Acquisition Institute Training Application System
FAR	Federal Acquisition Regulations
FY	Fiscal Year
GAO	Government Accountability Office
IT	Information Technology
NARA	National Archives and Records Administration
OFPP	Office of Federal Procurement Policy
OIG	Office of Inspector General
OMB	Office of Management and Budget
PR	Purchase Request
PRISM	Procurement System used by NARA
SAP	Simplified Acquisition Procedures
SPE	Senior Procurement Executive
U.S.C.	United States Code

## **Appendix G – Management Response**

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As of the date of this report, we had not received Management’s formal response. Upon receipt, we will work with the agency to resolve the recommendations.

## **Appendix H – Report Distribution List**

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Archivist of the United States  
Deputy Archivist of the United States  
Chief Operating Officer  
Deputy Chief Operating Officer  
Executive for Business Support Services  
Chief Financial Officer  
Director of Acquisitions Branch  
Director of Facility and Property Management Division  
Director of Space Planning and Projects Branch  
Audit Liaison

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Mail: IG Hotline  
NARA  
P.O. Box 1821  
Hyattsville, MD 20788-0821