

February 2000

# ACQUISITION REFORM

## GSA and VA Efforts to Improve Training of Their Acquisition Workforces



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B-282359

February 18, 2000

The Honorable Stephen Horn  
Chairman  
The Honorable James Turner  
Ranking Minority Member  
Subcommittee on Government Management,  
Information and Technology  
Committee on Government Reform  
House of Representatives

This report responds to your request for a review of the training of the acquisition workforce in certain federal civilian departments and agencies. You were concerned that civilian departments' and agencies' acquisition personnel may lack the necessary training to perform their acquisition responsibilities. These personnel are responsible for billions of dollars of procurement expenditures each year.

Specifically, as agreed with your office, we determined whether (1) the General Services Administration (GSA) and the Department of Veterans Affairs (VA) had assurance that their acquisition workforces met training requirements as defined by the Office of Federal Procurement Policy (OFPP) and whether contracting officers at one GSA and one VA field location met each agency's training requirements; (2) OFPP had taken action to ensure that civilian departments and agencies collected and maintained standardized acquisition workforce information, as required by the 1996 Clinger-Cohen Act; and (3) GSA and VA were taking actions to comply with Clinger-Cohen Act funding requirements.

To accomplish these objectives, we examined records and interviewed officials at GSA and VA headquarters, the Office of Management and Budget's OFPP, the Federal Acquisition Institute, the Office of Personnel Management (OPM), GSA's Greater Southwest Regional Office in Fort Worth, Texas, and VA's medical center in Dallas, Texas. We concentrated our efforts on GSA and VA, in part, because they had large numbers of contract specialists and had large volumes of contracting activity relative to other federal civilian agencies. In fiscal year 1997, GSA and VA contract specialists constituted 23 percent of the 8,320 contract specialists in all federal civilian executive departments and agencies. They had 1,224 and 727 specialists, respectively, making GSA and VA the top two federal civilian agencies in terms of numbers of contract specialists employed. In

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addition, in fiscal year 1997, GSA and VA spent 18 percent of the \$63.1 billion in federal contracting dollars (\$7 billion and \$4.5 billion, respectively) for civilian executive departments and agencies in the federal government. We conducted our review between March 1999 and February 2000 in accordance with generally accepted government auditing standards. A detailed discussion of our scope and methodology is presented in appendix I. We requested comments on a draft of this report from the Administrator of GSA, the Secretary of Veterans Affairs, and the Directors of the Office of Management and Budget and OPM. The comments are addressed at the end of this letter.

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## Results in Brief

Both GSA and VA have efforts under way to train their acquisition workforces. However, neither had assurance that all members of their acquisition workforces had received core training<sup>1</sup> and continuing education, as required by OFPP's policy. Neither agency had complete, readily accessible information on the overall extent to which their acquisition workforces had received required training. Training records maintained at one GSA and one VA field location we visited were incomplete. About a third of the files we reviewed at each field location lacked information on whether contracting officers met their core training and continuing education requirements.

Contrary to OFPP's policy, neither GSA nor VA had established core training requirements for some segments of their acquisition workforces—contracting officer representatives and contracting officer technical representatives who do not have authority to award contracts. These representatives comprised 14 percent of GSA's and 54 percent of VA's acquisition workforce, respectively. In addition, GSA's requirement for 16 hours of continuing education every 2 years for contracting officers having authority to award lower-dollar level contracts is not consistent with OFPP policy, which stipulates at least 40 hours every 2 years.

Furthermore, by reviewing agency training records and obtaining documentation directly from GSA's Greater Southwest Regional Office and VA's medical center in Dallas, we determined that 99 percent of GSA and 72 percent of VA contracting officers at these two locations met core training requirements that GSA and VA had established for such personnel. However, only about half of GSA's and VA's contracting officers in these locations who were to have continuing education requirements completed by December 1999 had met those requirements by the due date. To help

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<sup>1</sup>Training required before a contracting officer could award, administer, or terminate contracts on a permanent basis.

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explain why some officers had not completed the required training, agency officials cited (1) conflicts in scheduling the training and (2) a lack of awareness of training requirements.

OFFP has not yet ensured that civilian departments and agencies were collecting and maintaining standardized information, including training data, on their acquisition workforces, as required by Clinger-Cohen. In September 1997, OFPP tasked the Federal Acquisition Institute to work with departments and agencies and OPM to develop a governmentwide management information system, including specifications for the data elements to be captured, to assist departments and agencies in collecting and maintaining standardized data. System development was significantly delayed because the Institute and OPM had not reached agreement on final system requirements and specifications.

Neither GSA nor VA identified all the funds it planned to use for acquisition workforce training in its congressional budget justification documents as required by Clinger-Cohen. While VA had reported some of its acquisition training funding requirements in its budget documents for fiscal years 1998 through 2000 pursuant to Clinger-Cohen, GSA had only done so for fiscal year 2000 due to what GSA officials described as an administrative oversight. In addition, neither agency tracked all of its acquisition training expenditures. GSA plans to begin tracking training expenditures sometime during fiscal year 2000. In commenting on a draft of this report, VA said that it would explore the feasibility of doing this.

Clinger-Cohen provides that agencies may not obligate funds specifically appropriated for acquisition workforce education and training under the act for any other purpose. Appropriations acts we reviewed for GSA and VA did not specify a funding level for acquisition workforce education and training.

We are making recommendations to the Administrator of GSA, Secretary of VA, and Administrator of OFPP concerning observance of statutory and policy requirements.

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## Background

For fiscal year 1998, the Federal Procurement Data Center reported that federal agencies had contract obligations of about \$200 billion. Acquisition refers to the process of obtaining goods, services, and space for use by the government. The acquisition process begins with a determination of a need for goods or services and includes deciding on solicitation and selection of sources; award of contracts; and contract administration, completion, and closeout. Personnel in many different occupations perform these

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acquisition tasks, including those who are in the acquisition profession and those who are in other professions but who become involved in the acquisition process by performing such activities as determining requirements or monitoring contractor performance.

Congress, recognizing that billions of dollars are spent each year on federal procurement, the acquisition process is highly complex, and the caliber of the workforce is critical to the efficiency and effectiveness of the acquisition process, has expressed concern over the years about the expertise of the federal acquisition workforce. Every major congressional acquisition reform initiative since 1972 has included steps toward improving the acquisition workforce. Steps taken have included such measures as designating a central agency to provide leadership for acquisition workforce development, establishing minimum qualification requirements, requiring enhanced performance incentives, and giving greater visibility to funding for training the acquisition workforce.

The December 1972 report of the Commission on Government Procurement recommended improvements in the efficiency and effectiveness of the procurement process through various measures, including improving the caliber of the acquisition workforce. Since then, Congress and the executive branch have taken actions designed to improve the acquisition workforce. In 1974, Congress passed legislation establishing OFPP and, over the years, assigned it responsibility to provide direction of procurement policy and leadership in the development of executive agency procurement systems, including the professional development of acquisition personnel. Through legislation, Congress directed that the Federal Acquisition Institute, under the direction of OFPP, promote governmentwide career management programs for a professional acquisition workforce. The Institute carries out this role by such means as periodically analyzing acquisition career fields, developing competencies for acquisition positions, and developing acquisition training courses.

In February 1996, Congress enacted the Clinger-Cohen Act (P.L. 104-106). Section 4307 of Clinger-Cohen, entitled "Acquisition Workforce," amended the OFPP Act and requires OFPP to, among other things, (1) establish minimum acquisition workforce qualification requirements, (2) promote uniform implementation of acquisition education and training requirements among agencies to the extent this is consistent with their missions, (3) ensure that agencies collect and maintain standardized information on the acquisition workforce related to Clinger-Cohen's

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implementation, and (4) evaluate agencies' implementation of Clinger-Cohen.

In addition, Clinger-Cohen requires civilian agencies to establish, in consultation with OFPP, policies and procedures for effective management, including education and training requirements, for their acquisition workforces, and to ensure uniform implementation of policies and procedures among components to the maximum extent practicable. Clinger-Cohen further requires civilian agencies to separately identify the funding levels requested for acquisition workforce education and training in their congressional budget justification documents submitted in support of the President's budget and provides that agencies may not obligate funds appropriated for acquisition workforce education and training under the act for any other purpose.

In September 1997, after consulting with agency procurement executives, OFPP issued Policy Letter 97-01 that set forth governmentwide policies and approaches for implementing Clinger-Cohen's acquisition workforce provisions. Among other things, OFPP directed agencies to establish

- core training for contract specialists (GS-1102), contracting officers, purchasing agents (GS-1105), contracting officer representatives, and contracting officer technical representatives, and
- at least 40 hours of continuing education or training every 2 years for contract specialists and contracting officers.

There is one main occupational series that federal employees involved in acquisition work fall into—GS-1102. Contract specialists are defined as a broad category of employees whose positions are in the GS-1102 occupational series. This series includes those who perform the duties of contracting officers. Contracting officers are federal employees with the authority to bind the government legally by signing a contractual instrument. Purchasing agents, who by definition are in the GS-1105 occupational series, are federal employees who generally issue delivery orders against established contracts. Contracting officer representatives and contracting officer technical representatives are federal employees who have been designated by a contracting officer to perform certain contract administration activities, some of which relate to program or technical issues; these categories of acquisition personnel can be in a variety of OPM occupational series.

In Policy Letter 97-01, OFPP delegated to the Federal Acquisition Institute the responsibility for developing a governmentwide management information system that would allow departments and agencies to collect

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and maintain standardized acquisition workforce information, including training data, and that would conform to standards established by OPM for its Central Personnel Data File.<sup>2</sup>

Although OPM has data on the total number of federal employees in the GS-1102 and GS-1105 series, it does not have data on the numbers of acquisition personnel, such as contracting officers or contracting officer technical representatives who are in other job series. Therefore, because agencies have acquisition personnel in job series other than the GS-1102 and GS-1105 series, it is not possible to determine the total number of acquisition personnel governmentwide at this time. GSA and VA, however, have estimated the number of contracting officer representatives, contracting officer technical representatives, and other acquisition personnel they employ. Most recent OPM data show that as of March 1999, there were a total of about 31,400 acquisition personnel in the GS-1102 and GS-1105 job series, of whom about 20,900 were in the Department of Defense and about 10,500 were in civilian agencies.

According to GSA, as of December 1999, it had 3,146 acquisition personnel, including 1,319 in the GS-1102 and GS-1105 job series, 1,383 contracting officers who were not in the GS-1102 or GS-1105 job series, and 444 contracting officer representatives or contracting officer technical representatives, who were not contracting officers. In addition, GSA also reported that 253 of the 1,383 contracting officers were contracting officer representatives or contracting officer technical representatives.

According to VA, during 1999, it had 4,357 acquisition personnel, including 1,724 contracting officers in the 1102, 1105, or other job series, such as program analysts (GS-345), general engineering (GS-801), reality specialist (GS-1170), and prosthetic representative (GS-672); 2,355 contracting officer representatives or contracting officer technical representatives who were not contracting officers; and 278 others, such as supply management specialist (GS-2003) personnel and procurement, clerical, and technical (GS-1106) personnel. In addition, VA also reported that 21 of the 1,724 contracting officers were contracting officer representatives or contracting officer technical representatives.

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<sup>2</sup>This file, created and maintained by OPM, contains data on the federal civilian workforce. The standards cover such topics as classification series, grade level, service computation date, education level, and number and kind of personnel actions.



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## Neither GSA Nor VA Has Organizationwide Training Data, But Some Training Is Being Provided

Neither GSA nor VA has comprehensive organizationwide data showing the extent to which its acquisition workforce has received required training. Further, although both agencies have efforts under way to provide training, training records for acquisition personnel we reviewed at locations for each agency were incomplete; some acquisition personnel at each location had not met all of their training requirements; and contrary to OFPP's policy, neither agency had established core training requirements for all categories of acquisition personnel.

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## Automated Systems and Manual Records

Both GSA and VA lacked organizationwide data on the status of training provided to the organizations' acquisition workforce. Without such information, neither agency, nor OFPP, can be assured that Clinger-Cohen Act requirements relating to the training of the acquisition workforce are being met.

GSA and VA each have both automated information systems and manual records that have some information on their acquisition workforces. For example, GSA's automated personnel information system contains demographic information, such as an employee's name, job series and grade, location, and education. We found that the education level on 7 of 19 (37 percent) newly hired contract specialists was erroneous and had to be corrected to reconcile with the records located in the field. Furthermore, a GSA official told us that this automated system does not contain centralized data on the extent to which GSA's acquisition workforce meets core training and continuing education requirements. Instead, training records of this nature are maintained at the local level. With respect to VA, its Office of Acquisition and Materiel Management centrally collects and maintains training information on contracting officers with intermediate- and senior-level warrants.<sup>3</sup> The information includes the employee's name, title and grade, facility, core training completed, education level, and warrant level, but does not include core training information for contracting officers with basic-level warrants and contracting officer technical representatives. According to VA, its field offices are to maintain training information on contracting officers with basic-level warrants. VA officials told us that their headquarters' database does not contain up-to-date information on contracting officer's training for any warrant level because they suspended maintenance of their existing database in anticipation of the implementation of the governmentwide management information system in 1999.

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<sup>3</sup> A warrant is the certificate that authorizes a contracting officer to enter into, administer, or terminate contracts on behalf of the department or agency. Departments and agencies have various warrant levels with specified dollar thresholds.

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During our review of training records at VA's Dallas medical center, we found that 10 out of 11 intermediate- and senior-level contracting officers' headquarters database files were incomplete. In addition, each agency also maintains hard copy personnel files for its employees that, according to each agency, are supposed to contain a variety of data, including warrant level and training received. However, about one-third of the files we reviewed at the two agencies' field locations we visited were incomplete. Files were incomplete for

- 25 of the 70 (36 percent) files we reviewed at GSA's Greater Southwest Regional Office and
- 8 of the 25 (32 percent) files we reviewed at VA's Dallas medical center.

In these instances, files frequently lacked documentation that contracting officers met core training and continuing education requirements. We had to request additional information from the individual contracting officers or agency officials regarding warrants, core training, or continuing education for these 33 individuals. The contracting officers and agency officials provided us with the additional information.

In January 1998, GSA's Inspector General also found that training records were incomplete at GSA's Greater Southwest Regional Office.<sup>4</sup> Specifically, 48 of the 86 (56 percent) contracting officer files that the Inspector General reviewed lacked sufficient documentation to support the assertion that these individuals had completed all the required training for their type of appointment or warrant level. Although the Regional Administrator agreed with the Inspector General's recommendation to fully document all pertinent training, a July 1999 Inspector General report concluded that the Regional Administrator's action plan was not yet fully or satisfactorily implemented.<sup>5</sup>

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## Core Training

OFPP Policy Letter 97-01 directs executive agency heads to establish core training for acquisition personnel. GSA and VA have established core training for acquisition personnel who need a warrant. Table 1 shows the

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<sup>4</sup>Audit of Contracting Officer Warrant Program-Region 7, A72126/O/7/F98001, Jan. 22, 1998.

<sup>5</sup>Implementation Review of the Audit of Contracting Officer Warrant Program-Region 7, A72126/O/7/F98001, Jan. 22, 1998, A995243, July 9, 1999.

GSA and VA contracting officer warrant levels, contracting authority,<sup>6</sup> and number of core training courses required to obtain a warrant.

**Table 1: Contracting Officer Warrant Levels, Contracting Authority, and Core Training Courses Required to Obtain Warrants**

Warrant level	Contracting authority	Number of acquisition courses required to obtain warrants <sup>a</sup>
<b>GSA</b>		
Basic	\$25,000	2
Simplified acquisition	\$100,000	5
Intermediate	\$1,000,000	11
Senior	Unlimited	14
<b>VA</b>		
Basic	\$100,000	1
Intermediate	(Negotiated) \$500,000 (Sealed Bid) \$1,500,000	6
Senior	Unlimited	6

<sup>a</sup>One course generally consists of 40 hours of training.

Source: GSA Acquisition Letter MV-97-4, VA Handbook 7401.2 (draft), and Veterans Health Administration Directive 99-008.

GSA and VA issue permanent warrants to contracting officers who have completed the core training and who have the necessary work experience and formal education when there is a need for a warrant at a location. In addition, the agencies issue interim warrants when the need arises to contracting officers at all warrant levels, except basic, for a specified period to permit the completion of core training for a permanent warrant. Interim warrants are valid usually for up to 3 years for GSA and for up to 6 months for VA.

While GSA and VA have established core training requirements for contracting officers, neither has established such requirements for contracting officer representatives and contracting officer technical representatives who did not hold a warrant.<sup>7</sup> For GSA, these two groups represented 14 percent (about 444) of its 3,146 acquisition personnel, and for VA, they represented 54 percent (about 2,355) of its 4,357 acquisition personnel.

GSA officials told us that they had not provided acquisition-related training to contracting officer representatives and contracting officer technical

<sup>6</sup>Contracting authority is the dollar amount a contracting officer is authorized to obligate the government for purchasing goods and services. This dollar amount is for individual transactions (e.g., initial awards, contract modifications, supplemental agreements) and not the aggregate contract value.

<sup>7</sup>VA only uses the term contracting officer technical representative, but the term includes contracting officer representatives.

representatives who are not warranted because they performed limited acquisition tasks. However, a GSA official told us they now plan to include all contracting officer representatives and contracting officer technical representatives who are not warranted as part of the acquisition workforce. In this regard, GSA planned to prescribe computer on-line training for contracting officer representatives and contracting officer technical representatives who are not warranted in the near future.

VA did not require training for contracting officer technical representatives until November 1999, but according to a VA official, VA strongly encouraged and supported this training. Since 1997, VA had trained more than 340 contracting officer technical representatives and had spent approximately \$46,000 in fiscal years 1998 and 1999 on contracting officer technical representative training, according to a VA official. In addition, this official told us that VA had electronically distributed the Federal Acquisition Institute's contracting officer representative workbook and VA's contracting officer technical representative handbook to its acquisition workforce. Further, VA has made available to its acquisition workforce the Federal Acquisition Institute's on-line contracting officer representative mentoring course. In November 1999, VA issued a policy letter requiring contracting officer technical representatives to receive training that covers the competencies contained in the Federal Acquisition Institute's contracting officer technical representative workbook.

Our review of contracting officer training records in the two field locations we visited showed that 69 out of 70 (99 percent) of GSA's contracting officers had completed the core training, and 18 out of 25 (72 percent) of VA's contracting officers had completed the training (see table 2).

**Table 2: Status of Core Training Taken by Contracting Officers Whose Records We Reviewed in GSA's Greater Southwest Regional Office and VA's Dallas Medical Center**

<b>Warrant level</b>	<b>Completed training</b>	<b>Did not complete training</b>
<b>GSA</b>		
Basic	11	0
Simplified acquisition	9	0
Intermediate	2	0
Senior	36	0
Combination	11	1
<b>Subtotal</b>	<b>69</b>	<b>1</b>
<b>VA</b>		
Basic	7	7
Intermediate	5	0
Senior	6	0
<b>Subtotal</b>	<b>18</b>	<b>7</b>
<b>Total</b>	<b>87</b>	<b>8</b>

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Source: GAO analysis of GSA Greater Southwest Regional Office and VA Dallas medical center contracting officer training records.

According to a GSA Greater Southwest Regional Office official, the one contracting officer who had not completed the training did not need the warrant, and the warrant was suspended for this individual. VA's Dallas medical center officials told us that two of the seven contracting officers who had not completed the required training had not done so because VA headquarters had not scheduled it. The official told us that they plan to schedule the two contracting officers for the basic procurement class; however, they have not set a specific date for this training. Until we brought it to their attention, these officials were not aware that the other five contracting officers had not completed the core training. The officials told us they planned to address the training deficiencies by having the five contracting officers read acquisition training materials and take a test.

As a result of our findings, VA officials told us that they plan to incorporate reviews of acquisition workforce training in periodic reviews VA recently began doing of its acquisition operations. Since July 1999, VA's Office of Acquisition and Materiel Management has conducted four of these reviews, but the reviews have focused primarily on reviewing contract files for compliance with procurement regulations.

Since September 1997, GSA's Inspector General issued reports in which he stated that some acquisition personnel at various locations had adequate training whereas other personnel lacked sufficient training to do their jobs, including not completing the core training and not having specified training.<sup>8</sup> For example, the Inspector General reported that GSA's Helena Field Office (Helena, Montana) granted contracting officers simplified acquisition warrants without having satisfied specified training requirements.

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## Continuing Education

Both agencies have established policies mandating continuing education for contracting officers who have completed core training, but GSA's policies are not consistent with OFPP policy. OFPP requires 40 hours of continuing education every 2 years; GSA requires 16 hours every 2 years for contracting officers with basic and simplified acquisition-level

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<sup>8</sup>Review of Operations of Federal Supply Service's Hardware and Appliances Center, A995191/F/6V99517, Aug. 26, 1999; Audit of Procurements in the Helena Montana Field Office, A82453/P/R99503, Nov. 18, 1998; Advisory Review of Performance-Based Service Contracting Practices, A81502/P/5/R98027, Sept. 25, 1998; Follow-Up Review of the Contract Workload Management, A83007/F/W/V98009, Mar. 30, 1998; Audit of Contracting Officer Warrant Program Region 7, A72126/O/7/F98001, Jan. 22, 1998; and Audit of the Decentralization of Contracting Functions in the National Capital Region, A73010/P/W/R97037, Sept. 29, 1997.

warrants, and 40 hours every 2 years for intermediate- and senior-level warrants. According to GSA’s Director of Acquisition Policy, contracting officers with basic and simplified acquisition-level warrants do not require 40 hours of training because they perform less complex work than that of contracting officers with intermediate- and senior-level warrants.

We reviewed the training records for the 46 GSA and 8 VA contracting officers at the two field locations we visited, who were required by OFPP policy to meet continuing education requirements by December 1999,<sup>9</sup> and found that 22 out of 46 (48 percent) of GSA’s and 4 out of 8 (50 percent) of VA’s contracting officers had not met the OFPP requirements. Table 3 presents continuing education results by agency.

**Table 3: Status of Continuing Education Taken by Contracting Officers Whose Records We Reviewed in GSA’s Greater Southwest Regional Office and VA’s Dallas Medical Center**

Continuing education status	Number of contracting officers	
	GSA	VA
Completed all required continuing education	24	4
Completed no continuing education	14	0
Completed some required continuing education	8 <sup>a</sup>	4
<b>Total</b>	<b>46</b>	<b>8</b>

Note: All contracting officers in sample were expected to complete continuing education requirements by December 1999.

<sup>a</sup>Of the eight contracting officers, three met GSA’s criteria of 16 hours of continuing education for basic and simplified acquisition-level warrants but not OFPP’s requirements.

Source: GAO analysis of GSA Greater Southwest Regional Office and VA Dallas medical center contracting officer training records.

GSA regional officials told us that the contracting officers did not complete their required continuing education by the December 1999 time frame because a 40-hour class in October 1999 was cancelled due to a scheduling conflict. These officials told us that they have scheduled training by the spring of 2000 to help ensure that the region’s contracting officers meet their requirements. The VA Dallas medical center’s Chief of Acquisition and Materiel Management Service told us that he was unaware of the continuing education requirement; thus, he did not have a training plan for the four individuals who did not receive the required training.

The GSA Regional Administrator said that his policy is to terminate warrants of those contracting officers who do not meet continuing education requirements after a 90-day grace period. Similarly, VA has a

<sup>9</sup>Of the remaining (70 minus 46) contracting officers at GSA, 23 had their continuing education requirements due January 2000 or later and one had not completed the core training and therefore did not have a continuing education requirement. Of the remaining (25 minus 8) contracting officers at VA, 10 had their continuing education requirements due January 2000 or later and seven had not completed the core training and therefore did not have a continuing education requirement.

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draft policy that states contracting officers' warrants may be terminated at the discretion of the appointing official if they do not meet continuing education requirements.

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## OFFPP Has Not Ensured That Federal Civilian Agencies Collect and Maintain Acquisition Workforce Information

OFFPP has not complied with the Clinger-Cohen Act of 1996, which requires OFFPP to ensure that civilian departments and agencies collect and maintain standardized information on their acquisition workforces. Although in September 1997 OFFPP tasked the Federal Acquisition Institute with developing a management information system to assist departments and agencies in collecting and maintaining standardized data, the system has not yet been developed. In the meantime, GSA and VA rely on automated systems that provide limited information and on decentralized, manual files that, according to agency officials, greatly impede their ability to oversee and plan training for their acquisition workforces.

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## System Delayed for Maintaining Acquisition Workforce Information

Although Clinger-Cohen was enacted in February 1996, OFFPP did not issue a policy implementing the act's acquisition workforce provisions until September 1997, when it issued Policy Letter 97-01. According to OFFPP officials, the reason for the delay in issuing Policy Letter 97-01 was that members of the Section 37 Steering Committee did not agree on education requirements for contract specialists until May 1997.<sup>10</sup> OFFPP's Policy Letter 97-01 tasked the Federal Acquisition Institute to work with agencies and OPM to develop a governmentwide management information system that would allow departments and agencies to collect and maintain standardized acquisition workforce information, including training data. This system is to conform to OPM's Central Personnel Data File standards. These standards require that workforce data include such information as job classification series, grade level, service computation date, and education level. The Federal Acquisition Institute, after several consultations with the Section 37 Steering Committee, envisioned that the system would collect information on a contracting officer's name, social security number, grade and job series, formal education, agency, core training, continuing education, and warrant level.

In July 1998, the Federal Acquisition Institute requested OPM's assistance in implementing this governmentwide management information system, and provided OPM with initial data elements that it believed were needed to be included in the system. In August 1998, OPM submitted to the Federal Acquisition Institute a concept paper that outlined its ideas for the system's specifications. In this concept paper, OPM stated that it would

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<sup>10</sup>The Section 37 Steering Committee is comprised of civilian agency Senior Procurement Executives who make recommendations to OFFPP in implementing Clinger-Cohen Act provisions.

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build or oversee the construction of an Internet-based system, which would be linked to the Central Personnel Data File, and agreed that the system would contain, at a minimum, the data elements presented by the Institute.

In September 1998, GSA, (on behalf of the Federal Acquisition Institute), and OPM entered into a memorandum of understanding through which OPM agreed to develop the management information system for approximately \$60,000 and deliver the new system in approximately 16 weeks. The Federal Acquisition Institute selected OPM to develop this system because of its expertise in developing, delivering, and maintaining automated personnel systems. However, OPM chose not to develop this system in-house, but instead, selected a private firm—Lexitech.

In November 1998, the Federal Acquisition Institute, OPM, Lexitech, and other government officials met to discuss the system's goals, site design, flowchart, storyboards, development, and population to be covered. In addition, this group decided on actions to take so the project could move forward. However, project records we reviewed indicate that little progress has been made since that November 1998 meeting due to the lack of agreement between the Institute and OPM on final system requirements and specifications. Although project records do not document substantial action taking place between November 1998 and May 1999 to resolve the situation, Federal Acquisition Institute and OPM officials told us they had taken action during this time period to continue developing the system. In May 1999, the Institute increased efforts to get the project moving, but as of December 1999, agreement had still not been reached and the system had still not been developed; however, OPM had spent about \$30,000. Although an OPM official told us these funds were used to pay for OPM staff hours devoted to this project and for an approved contractor payment for original storyboard development, travel, and draft Internet web page development, he was unable to provide us with full documentation.

OPM's project manager told us that once the Federal Acquisition Institute and OPM agree on the requirements, Lexitech would need only a few weeks to develop the system. In December 1999, the Director of the Federal Acquisition Institute told us that she had asked OPM to provide her with a management plan by January 2000, which would provide her with the actions and time frames for completing project events. She stated that she wanted to begin testing the system by February 2000.

In January 2000, OPM provided the Federal Acquisition Institute with a project plan that estimated the system's completion by the end of April



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2000. Subsequently, the Federal Acquisition Institute requested that a new project manager and a new firm to develop the system be identified, according to an OPM official. This official told us that OPM assigned a new project manager and has initiated the process for selecting a new firm to develop the system. This official also told us that the project plan would be revised and approved by the Federal Acquisition Institute and OPM once a new firm has been selected. This official further stated that it is unlikely that system testing will begin in February 2000, since a new firm is being sought to develop the system. However, he stated that OPM has provided the proposed new firms the April 2000 target date for completion.

In February 2000, an OFPP official told us that OFPP, the Federal Acquisition Institute, and OPM have now reached agreement on how to move the project forward. This official also told us that OFPP has engaged senior OPM management personnel to ensure that both organizations focus on completing the project. In addition, OFPP expects that project development will be under way by the end of February 2000, according to this same official.

GSA and VA officials told us that they have held off developing their own agency management information systems to comply with Clinger-Cohen because they were made aware that a system was being developed. According to GSA and VA officials, however, the limited information their present systems provide greatly impedes their managers' ability to oversee and plan training for their acquisition workforces. Because it has a critical need for immediate access to timely and accurate acquisition workforce data, VA plans to design and implement a database on its own and deal with compatibility issues as the need arises, according to VA officials.

In June 1992, OFPP issued Policy Letter 92-3 that required heads of executive departments and agencies to provide for a system for certifying and reporting the completion of all required training. In October 1998, the Federal Acquisition Institute provided senior procurement executives with guidance on the data to be collected to meet Clinger-Cohen requirements. Although OFPP and the Federal Acquisition Institute had provided agencies guidance and instructions on what data to collect, GSA and VA have relied on automated systems that provide limited information and on decentralized, manual files, which have resulted in a lack of complete, readily accessible information on workforce training. For example, in responding to our requests for information on training and certification (such as the number of agency personnel holding contracting officer warrants), both GSA and VA had to send queries to widespread field offices, resulting in weeks of delay in getting responses.

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## GSA and VA Efforts to Comply With Clinger-Cohen Funding Provisions

Both GSA and VA reported that they primarily used revolving funds to finance the education and training of their acquisition workforces.<sup>11</sup> While VA had reported some of its education and training funding requirements in its congressional budget justification documents for fiscal years 1998 through 2000, pursuant to Clinger-Cohen, GSA had only done so for fiscal year 2000 due to what GSA officials described as an administrative oversight.

Although GSA identified acquisition workforce education and training funding in its fiscal year 2000 congressional budget justification documents, GSA officials told us they do not apply the limitation in Clinger-Cohen, which governs funds specifically appropriated for such training, to the revolving funds that are the primary source of financing this training at GSA. VA officials told us they were restricting the obligation of most of the funding amounts identified in the budget justification documents for acquisition workforce education and training, even though VA mainly used revolving funds to finance these activities. Neither VA's nor GSA's appropriations acts for fiscal years 1998, 1999, or 2000, nor the committee reports accompanying those acts, designated any specific amount of funds for the purpose of acquisition workforce education and training.

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## GSA and VA Budget Estimates Understated

Although both GSA and VA identified funding planned to be used for training their acquisition workforces for fiscal year 2000 in their budget documents, both appear to have understated the amounts they planned to use for this purpose. GSA identified about \$2.8 million to educate and train its acquisition workforce in its fiscal year 2000 congressional budget justification documents. Only \$27,000 of this amount was to come from annually appropriated funds, while revolving funds were identified as the source for the remainder of this funding. However, GSA documents indicate that it plans to use more than \$2.8 million to educate and train its acquisition workforce. For example, GSA plans to use other funds to educate and train segments of its acquisition workforce that have already met their qualification requirements. We also found that some of GSA's regional components did not provide an estimate to headquarters of the funding needed to educate and train their acquisition workforces. In addition, we noted that the funding estimates that GSA's regions submitted to GSA headquarters did not consider the training needs of all their contracting officers. For example, according to a GSA official, the Public

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<sup>11</sup>Revolving funds are accounts established by law to finance a continuing cycle of operations. The receipts derived from such operations may be available in their entirety for use by the fund without further action by Congress.

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Buildings Service at GSA's Southeast Sunbelt Regional Office (Atlanta, Georgia) only submitted budgeted amounts for contracting officers in the GS-1102 job series, even though it had contracting officers in other job series, because they considered only GS-1102s as part of the acquisition workforce.

For fiscal years 1998, 1999, and 2000, VA estimated that it would use about \$2.2 million, \$2.3 million, and \$2.3 million, respectively, for Office of Acquisition and Materiel Management sponsored acquisition workforce education and training. VA officials told us this budgeted amount would come from the "Supply Fund," which is a revolving fund. VA officials told us they used money from the Supply Fund to provide (1) mandatory contracting officer training and continuing education for Office of Acquisition and Materiel Management personnel, (2) mandatory contracting officer training for all warranted personnel throughout the department, and (3) Office of Acquisition and Materiel Management sponsored continuing education for all acquisition personnel departmentwide. However, VA officials said that the Office of Acquisition and Materiel Management did not use the Supply Fund to provide continuing education for acquisition personnel in other units unless they sponsored the training. Instead, the VA officials said that other units, such as the Veterans Health Administration, used local facility appropriated funds for contracting officer noncore training and continuing education for their acquisition workforce personnel. Thus, funding for this training was not included in the amounts VA has identified for training its acquisition workforce in its budget documents.

In addition, VA officials told us that their budget requests had not included enough funding to cover VA's entire acquisition workforce. VA officials also said they were unaware of acquisition workforce personnel who were not receiving training, particularly those with basic-level warrants. Thus, they said that they had not previously asked for additional funding to educate and train these personnel; however, based on our findings, they said that they would be asking for additional funds for fiscal year 2001.

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## All Training Funds Not Tracked

Neither GSA nor VA tracked all acquisition education and training expenditures. However, according to GSA officials, GSA planned to implement sometime in fiscal year 2000 a mechanism that would allow tracking of such expenditures. For example, GSA's Budget Office officials told us that GSA had planned, at the start of fiscal year 2000, to begin tracking all funding used for educating and training its acquisition workforce by using a special function code in GSA's accounting system. However, GSA was delaying the implementation of this tracking

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mechanism until at least the second quarter of fiscal year 2000 because of Year 2000 (Y2K) computer concerns, according to the official. A VA official told us that as of December 1999, VA had no plans to implement a mechanism for identifying all funding used to educate and train its acquisition workforce. Although VA said that it had restricted the obligation of the revolving fund amounts identified in the budget justification documents for educating and training its acquisition workforce, a VA official told us that VA was unable to determine all of the actual expenditures used for this purpose.

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## Conclusions

Due to the lack of data, neither GSA nor VA knows the extent to which its acquisition workforce meets training requirements, and neither is in a position to see that minimum training requirements are uniformly met throughout the agencies, as required by the Clinger-Cohen Act. GSA and VA have been working toward training their acquisition workforces, but neither has fully complied with applicable training requirements. As a result of our review, these agencies said that they would revise their acquisition core training programs to encompass personnel initially excluded—nonwarranted contracting officer representatives and contracting officer technical representatives. However, GSA was still not following OFPP policy on continuing education. In our opinion, adherence to OFPP's continuing education policy would better equip GSA's acquisition personnel to stay abreast of acquisition reforms and increase their acquisition knowledge and skills.

Four years after the Clinger-Cohen Act's passage requiring OFPP to ensure that agencies collect and maintain standardized information on their acquisition workforces, OFPP has not done so. Consequently, OFPP is not in a good position to evaluate the way agencies are implementing these provisions, as it is required to do.

Both GSA and VA identified in their fiscal year 2000 congressional budget justification documents amounts for the education and training funding requirements for their acquisition workforces, as Clinger-Cohen requires them to do. Neither agency, however, provided complete information on the amounts it planned to use to educate and train its acquisition workforces, nor did either identify and track the actual amounts it expended for this purpose for fiscal years 1998 and 1999. GSA plans to implement a mechanism sometime in fiscal year 2000 that would allow tracking of such expenditures, and VA plans to determine the feasibility of tracking these types of expenditures. In our opinion, the lack of complete information on funding planned and used for educating and training the acquisition workforces at GSA and VA makes it more difficult for Congress

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to make well-informed decisions relative to the knowledge and skill levels of acquisition personnel at these two agencies.

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## Recommendations

To ensure that the skills of their acquisition workforces are current, we recommend that the Administrator of GSA and the Secretary of Veterans Affairs fully adhere to OFPP's policy associated with Clinger-Cohen's training provisions by (1) establishing core training requirements for all contracting officer representatives and contracting officer technical representatives; (2) ensuring that all acquisition personnel receive the required core training and continuing education, consistent with OFPP's policy; (3) directing appropriate agency personnel to collect and maintain accurate and up-to-date data showing the extent to which acquisition personnel meet training requirements; and (4) seeing that all funding that agencies plan to use for educating and training their acquisition workforces is identified in appropriate budget documents and that all related expenditures for such education and training are tracked.

In addition, for OFPP to ensure that civilian departments and agencies collect and maintain standardized acquisition workforce information, we recommend that the Administrator of OFPP take action necessary to ensure that the Federal Acquisition Institute and OPM complete and implement the governmentwide management information system being developed to implement Clinger-Cohen's requirements for standardized acquisition workforce information.

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## Agency Comments and Our Evaluation

We provided a draft of this report to the Administrator of GSA, the Secretary of Veterans Affairs, and the Directors of the Office of Management and Budget and Office of Personnel Management for their review and comment. On February 15, 2000, we received written comments from the Administrator of GSA. He agreed with our recommendations and outlined the actions GSA plans to take to implement them (see app. II).

On February 9, 2000, we received written comments from the Department of Veterans Affairs' Assistant Secretary for Planning and Analysis. He agreed that the VA could improve its managing of acquisition workforce training requirements. He also concurred with our recommendations and outlined the steps under way and planned for VA to conform with statutory and policy requirements (see app. III). In responding to our recommendation for seeing that all funding that agencies plan to use for educating and training their acquisition workforces is identified in appropriate budget documents and that all related expenditures for such education and training are tracked, VA said that it planned to ask OFFP for

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clarification of the Clinger-Cohen Act's funding requirements. In discussions with an official from VA's Office of Acquisition and Materiel Management about this issue, it became clear that there was some confusion concerning VA's interpretation of our recommendation. After we explained that our recommendation only applied to all funding for acquisition workforce education and training associated with Clinger-Cohen's funding provision and not other education and training acquisition workforce members receive, this official told us that VA no longer needed to clarify the interpretation of Clinger-Cohen's funding provision with OFPP.

On February 4, 2000, OFPP's Procurement Innovation Branch Chief and his staff provided oral comments on our draft report. They said that OFPP concurred with our recommendation to the Administrator and provided technical comments. We modified our report, where appropriate, to reflect their comments.

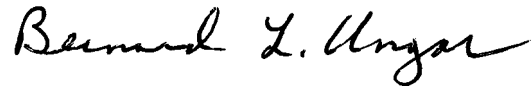
On February 4, 2000, OPM's Deputy Chief of Staff provided oral comments, saying that OPM is working diligently to move development of the data system forward. He also provided technical comments, which we have included in this report, as appropriate. Program officials at GSA and VA also provided technical comments, which we have reflected in this report, as appropriate.

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We are sending copies of this report to Senator Fred Thompson, Chairman, and Senator Joseph Lieberman, Ranking Minority Member, Senate Committee on Governmental Affairs; the Honorable David L. Barram, Administrator of GSA; Togo D. West, Jr., Secretary of Veterans Affairs; Jacob Lew, Director of the Office of Management and Budget; Deidre A. Lee, Administrator of the Office of Federal Procurement Policy; and Janice R. Lachance, Director of the Office of Personnel Management. We will make copies available to others upon request.

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Key contributors to this assignment are acknowledged in appendix IV. If you have any questions regarding this report, please contact me on (202) 512-8387 or Hilary Sullivan on (214) 777-5600.



Bernard L. Ungar  
Director, Government Business  
Operations Issues

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**Contents**

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**Abbreviations**

GSA	General Services Administration
OFPP	Office of Federal Procurement Policy
OPM	Office of Personnel Management
VA	Department of Veterans Affairs

# Objectives, Scope, and Methodology

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Our objectives were to determine whether (1) the General Services Administration (GSA) and the Department of Veterans Affairs (VA) had assurance that their acquisition workforces met training requirements as defined by the Office of Federal Procurement Policy (OFPP) and whether contracting officers at one GSA and one VA field location met each agency's training requirements; (2) OFPP had ensured that federal civilian departments and agencies collected and maintained standardized acquisition workforce information, as required by the 1996 Clinger-Cohen Act; and (3) GSA and VA were taking actions to comply with the Clinger-Cohen Act's funding requirements.

To determine the actions GSA and VA had taken in ensuring that their acquisition workforce met training requirements, we researched and analyzed the Clinger-Cohen Act and OFPP policy letters to identify the relevant provisions and policies. We then interviewed GSA headquarters officials in Washington, D.C., and regional officials in Fort Worth, Texas, to determine their actions in implementing the acts' training requirements and OFPP policies. We also interviewed VA headquarters officials in Washington, D.C., and VA medical center officials in Dallas, Texas, for the same purpose.

To assess whether GSA and VA contracting officers met training requirements, as set out by each agency's headquarters office (associated with relevant Clinger-Cohen requirements and OFPP Policy Letter 97-01), we examined data maintained at their headquarters for acquisition workforce training and discussed this issue with acquisition officials at each agency. In addition, we randomly selected a sample of 75 out of 324 contracting officer training records at GSA's Greater Southwest Regional Office in Fort Worth, Texas, and all 26 records at VA's medical center in Dallas, Texas. We adjusted our original sample size of 75 contracting officers to 70 at GSA's Greater Southwest Regional Office because the list provided was inaccurate.<sup>1</sup> We eliminated one individual's name from the list of 26 contracting officers at VA's Dallas medical center because this individual did not have a warrant. We examined the selected training records to assess whether contracting officers met training requirements, and we discussed training and documentation issues with acquisition officials at each agency's field location.

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<sup>1</sup> For example, one contracting officer relocated to another GSA region, one contracting officer was listed twice, two contracting officers were not warranted, and one contracting officer was unknown to GSA Greater Southwest Regional Office management.

We reviewed GSA Inspector General reports related to the education and training of GSA's acquisition workforce. For the reports associated with GSA's Greater Southwest Regional Office, we discussed the audit findings with Inspector General staff. VA's Office of Inspector General had not completed audits on these issues at the VA since the enactment of Clinger-Cohen.

We selected GSA and VA for review because they have large numbers of contract specialists (GS-1102), handle large amounts of contracting dollars, and engage in decentralized activities. In fiscal year 1997, GSA and VA contract specialists constituted 23 percent of the 8,320 contract specialists in all federal civilian executive departments and agencies. They had 1,224 and 727 specialists, respectively, making GSA and VA the top two federal civilian agencies in terms of numbers of contract specialists employed. In addition, in fiscal year 1997, GSA and VA spent 18 percent of the \$63.1 billion in federal contracting dollars (\$7 billion and \$4.5 billion, respectively) for civilian executive departments and agencies in the federal government. GSA and VA's decentralized procurement activities also provided us the opportunity to review both headquarters' and field activities' efforts at educating and training their acquisition workforces.

We conducted our review at GSA's Greater Southwest Regional Office because, out of GSA's 11 regional offices, the Greater Southwest Regional Office had the highest number of contract specialists and had contract specialists assigned to all of the region's three services (Federal Supply Service, Federal Technology Service, and Public Buildings Service). We conducted our review at the VA Dallas medical center because it was the fifth largest VA facility in terms of the number of acquisition personnel and the largest VA facility within the state of Texas.

We researched and analyzed the Clinger-Cohen Act to identify the provisions and policies related to OFPP's requirement to ensure that agencies collect and maintain standardized acquisition workforce information, including training data. We interviewed OFPP officials in Washington, D.C., to obtain their views on these provisions and policies to identify their actions for ensuring that departments and agencies implement this requirement. We reviewed documents such as the project agreement, scope of work, cost reports, and electronic communications between OFPP, the Federal Acquisition Institute, Office of Personnel Management (OPM), and Lexitech (the private firm) to determine the status of the development of a governmentwide management information system that would allow departments and agencies to collect and maintain standardized information on the acquisition workforce, including training

data, that conform to standards established by OPM for the Central Personnel Data File. We also interviewed the Federal Acquisition Institute and OPM officials in Washington, D.C., and an OPM official in Macon, Georgia, to determine the actions they had taken to develop a governmentwide management information system. In addition, we interviewed GSA and VA officials in Washington, D.C., to determine the actions taken to collect and maintain standardized information on their acquisition workforces.

To determine the actions GSA and VA had taken to fund and track the cost of educating and training their workforces, we reviewed agency budget development and congressional budget justification documents, and we interviewed GSA and VA officials at both Washington, D.C., headquarters and Fort Worth and Dallas, Texas, field locations. Also, we interviewed GSA and VA officials at both headquarters and field locations to obtain their views on Clinger-Cohen's funding provisions and to identify any barriers to implementing the act's requirements. We did not verify data in agencies' automated information systems.

We requested comments on a draft of this report from the Administrator of the General Services Administration, the Secretary of Veterans Affairs, and the Directors of the Office of Management and Budget and the Office of Personnel Management and made changes to the final report as appropriate.

# Comments From the General Services Administration



U.S. GENERAL SERVICES ADMINISTRATION  
Administrator

February 15, 2000

Mr. Bernard L. Ungar  
Director, Government  
Business Operations Issues  
General Accounting Office  
Washington, DC 20548

Dear Mr. Ungar:

Thank you for the opportunity to review and comment on your draft report to the General Services Administration (GSA) and congressional committees entitled ACQUISITION REFORM: GSA and VA Efforts to Improve Training of Their Acquisition Workforces.

Your report contains four recommendations to ensure that GSA's acquisition workforce is fully prepared to perform the necessary duties and tasks of Government acquisition professionals. GSA agrees with your recommendations and will take the following actions necessary to implement them. GSA's Federal Acquisition Institute and the Office of Federal Procurement Policy will jointly respond to the Report in a separate letter. Several other specific comments have been electronically provided to GAO's Dallas office.

Recommendation (1):

GSA has already prescribed the COR Mentor on-line course as the core training for all warranted CORs/COTRs within the agency. This requirement will be expanded to include the completion of the COR Mentor by all non-warranted CORs/COTRs as well. As was previously noted, though the COR Mentor provides training in 18 COR/COTR duties, not all of GSA's CORs/COTRs are assigned to perform the full range of duties covered in the COR Mentor. Therefore, anyone designated as a GSA COR/COTR will be required to complete only those portions of the COR Mentor that relate to the duties to which they have been assigned.

Recommendations (2) and (3):

These recommendations are interrelated. GSA's Office of Acquisition Policy and our Office of the Chief People Officer will work together to determine how best to establish a database or other system that will enable GSA to continuously track the training received by all of the agency's acquisition personnel. The Office of Acquisition Policy will periodically monitor the database or system to ensure that acquisition personnel are completing the required core training and fulfilling the continuing education requirements. GSA will examine its current policy

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concerning continuing educational requirements to determine if changes are warranted.

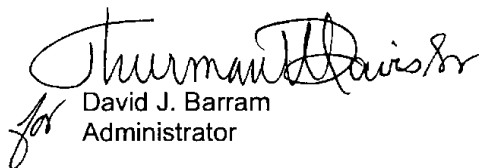
Recommendation (4):

GSA will continue to identify all funding for educating and training the GSA acquisition workforce in the GSA Congressional budget. GSA will also track related obligations for such education and training through the appropriate GSA accounting system. This funding will be indicated on allowances of funds documents as appropriate.

GSA is pleased that your review of the records at GSA's Greater Southwest Regional office in Ft. Worth, Texas found that 99 percent of GSA's contracting officers had completed the required core training. GSA is also proud of the efforts undertaken by GSA's Services to support the training and education of the acquisition workforce, such as the Federal Supply Service's Education and Training Plan for 1102's, various awards programs which recognize excellence in the contracting profession, and ongoing programs in each Region and Central Office contracting activity to financially assist employees to complete college courses relevant to the acquisition field.

There can be no question that the GSA acquisition workforce is critical to our ability to provide quality and cost-effective goods and services to the Federal Government. This Agency will continue to seek ways to expand the training and educational opportunities available to those personnel, and to ensure that they fulfill or surpass their training obligations. If you have any questions, you may contact Al Matera, Director, GSA Acquisition Policy on (202) 501-1224.

Sincerely,

  
for David J. Barram  
Administrator

# Comments From the Department of Veterans Affairs



DEPARTMENT OF VETERANS AFFAIRS  
WASHINGTON DC 20420

FEB 9 2000

Mr. Bernard L. Ungar  
Director, Government Business  
Operations Issues  
General Government Division  
U. S. General Accounting Office  
441 G Street, NW  
Washington, DC 20548

Dear Mr. Ungar,

We have reviewed your draft report, **ACQUISITION REFORM: GSA and VA Efforts to Improve Training of Their Acquisition Workforces** (GAO/GGD-00-nn) and agree that the Department of Veterans Affairs (VA) can improve its managing of our acquisition workforce training requirements. VA concurs in GAO's recommendations; the enclosure provides steps underway and planned for VA to conform with statutory and policy requirements.

GAO's review has been helpful in identifying VA's acquisition workforce education and training needs both at the policy oversight level in VA Central Office as well as the individual contracting officer level in our many facilities around the country. We appreciate the opportunity to comment on your draft report.

Sincerely,

A handwritten signature in black ink, appearing to read "Duffy".

Dennis Duffy  
Assistant Secretary for  
Planning and Analysis

Enclosures

Enclosure (1)

DEPARTMENT OF VETERANS AFFAIRS  
COMMENTS TO GAO DRAFT REPORT,  
***ACQUISITION REFORM: GSA and VA Efforts to Improve  
Training of Their Acquisition Workforces***  
(GAO/GGD-00-nn)

**To ensure that the skills of their acquisition workforces are current, GAO recommends that the Administrator of GSA and the Secretary of VA fully adhere to OFPP's policy associated with Clinger-Cohen's training provisions by:**

- (1) establishing core training requirements for all contracting officer representatives and contracting officer technical representatives;**

Concur - VA's Office of Acquisition and Materiel Management (OA&MM) strongly supports training Contracting Officer Technical Representatives (COTRs). As stated in its September 24, 1999, response to GAO's Dallas Regional Office, OA&MM electronically distributed VA's COTR Handbook and the Federal Acquisition Institute's (FAI's) Contracting Officer Representative (COR) Workbook to its acquisition work force. OA&MM also announced and aggressively promotes FAI's on-line COR Mentoring course. Information Letter 90-99-5 (Enclosure 2), states VA COTRs must receive training that covers the competencies identified in FAI's COR Workbook. The Information Letter also reminds VA contracting officers of their responsibility to ensure COTRs receive training. OA&MM will continue to emphasize this requirement and will require each contracting officer to maintain records reflecting COTRs' training. Further, OA&MM will review these records when conducting on-site reviews.

- (2) ensuring that all acquisition personnel receive the required core training and continuing education, consistent with OFPP's policy;**

Concur - As stated in VA Policy MP-5, Part 1, Chapter 410 (Enclosure 3) supervisors are responsible for identifying training needs of their employees. Historically, OA&MM has relied on acquisition work force members' supervisors to ensure employees receive required core training and continuing education. However, GAO's review disclosed this duty is not consistently performed. Consequently, OA&MM is enhancing its oversight of acquisition work force members' nominations to training and continuing education sessions. OA&MM has also begun reviewing acquisition work force members' training and



Enclosure (1)

DEPARTMENT OF VETERANS AFFAIRS  
COMMENTS TO GAO DRAFT REPORT,  
***ACQUISITION REFORM: GSA and VA Efforts to Improve  
Training of Their Acquisition Workforces***  
(GAO/GGD-00-nn)  
(Continued)

continuing education as part of its business review function. In addition, OA&MM is working aggressively to implement a comprehensive acquisition work force database. Once implemented, the database will enable OA&MM to more closely monitor currency of training for all members of VA's acquisition work force. OA&MM staff will note and address instances of insufficient training.

**(3) directing appropriate agency personnel to collect and maintain accurate and up-to-date data showing the extent to which acquisition personnel meet training requirements; and**

Concur - In accordance with VA Policy MP-5, Part 1, Chapter 410, Human Resources Management Officers are responsible for maintaining training records. However, presently, there is no system within VA that exclusively collects and maintains accurate and up-to-date data on acquisition personnel training. OA&MM is expanding and updating its acquisition work force database and will work with the Administrations and other appropriate VA personnel to ensure training is included in the database and information is updated as needed.

**(4) seeing that all funding that agencies plan to use for educating and training their acquisition workforces is identified in appropriate budget documents and that all related expenditures for such education and training are tracked.**

Concur - Within VA, OA&MM is the primary funding source for the acquisition training and continuing education that the Clinger-Cohen Act requires. OA&MM funds acquisition training and education through the revolving Supply Fund it manages. Heretofore, VA has not interpreted the Act to preclude Administrations from also providing education and training to their employees, if the employees are members of VA's acquisition work force. The acquisition training and education required by the Clinger-Cohen Act is funded as a line item in the revolving Supply Fund. VA has not interpreted the Clinger-Cohen Act to mean other training and education acquisition work force members receive must also be set forth separately as a line item in the Department's appropriated budget. As documented in the information provided to GAO-Dallas in July 1999, VA Administrations do provide their employees, who are also members of VA's acquisition work force, training and education that is beyond the training and

Enclosure (1)

DEPARTMENT OF VETERANS AFFAIRS  
COMMENTS TO GAO DRAFT REPORT,  
***ACQUISITION REFORM: GSA and VA Efforts to Improve  
Training of Their Acquisition Workforces***  
(GAO/GGD-00-*nn*)  
(Continued)

education required by the Clinger-Cohen Act. OA&MM will clarify our interpretation of the Funding Levels provision of the Clinger-Cohen Act (Enclosure 4) with the Office of Federal Procurement Policy. We will also work with the appropriate VA Administrations to determine the feasibility of consolidating and tracking all appropriated and revolving funds expended for acquisition work force members' education and training.

At GAO's request, OA&MM staff provided informal comments to GAO's draft report via e-mail on February 3, 2000 (Enclosure 5).

# GAO Contacts and Staff Acknowledgments

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## GAO Contacts

Bernard L. Ungar (202) 512-4232

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## Acknowledgments

Steve D. Boyles, John E. Clary, Luis Escalante, Jr., Raimondo Occhipinti, Elliott C. Smith, and Joel Smith made key contributions to this report.

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