



**Contracting Officer's Representative
Certification Implementation
Strategy for Fire and Aviation
Contracts Task Group**

Final Report



COR Task Group

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Executive Summary

In order to meet agency policy regarding certification requirements for a Contracting Officer Representative (COR), the National Fire and Aviation Contracting program is facing the challenge of upgrading training for thousands of personnel currently used for contract administration. These personnel include the Administratively Determined (AD) and seasonal workforce as well as our interagency partners. The problem is compounded by differences in the way the national fire and aviation contracts, blanket purchase agreements, and Emergency Equipment Rental Agreements deal with the designation and use of CORs. To address this issue, and to assist Fire and Aviation Management and Acquisition Management leadership in determining the technical and program needs for the National Fire and Aviation contract program, a group was chartered in June of 2006. The following is a brief summary of their findings and recommendations:

The current model for managing National Fire and Aviation Contracts is inconsistent, lacks dedicated program management and support, places an undue burden on the National Contracting Officers, and does not meet current policy and training requirements. To bring all aspects of the National Contracts into compliance would require significant investments in training (estimated costs exceed \$5mm annually) and would fail to address other program management issues. Continuing in the same direction, but with the required training would preclude some of the interagency workforce from participating. At the same time, it does not guarantee the investment in training will ensure availability of personnel when needed.

Consequently, the team recommends a change in the organizational model currently being used to administer Fire and Aviation Management contracts by urging the National Office to adopt one of the proposed alternatives. The Task Groups preferred alternative is Alternative V, referred to as the ICS Alternative. Re-organizing as specified under the alternative provides for:

- 1) Program management and technical support to the National Contracting Officers (NCOs);
- 2) An efficient and effective group of CORs from each geographic area to provide direct technical support to the Project Inspectors, Program Managers, and NCOs;
- 3) The elimination of designating CORs by virtue of their position;
- 4) Meeting all certification and training requirements in an efficient, cost effective manner; and
- 5) A robust workforce of Project Inspectors to meet day to day contractual responsibilities.



Introduction

In June of 2006, the National Directors of Fire and Aviation Management (FAM), and Acquisition Management (AQM), formed a Task Group to address management issues associated with National Fire and Aviation Contracts. Specifically, the Task Group was asked to:

- Describe the current situation;
- Develop alternative strategies to implement an appropriate COR (Contracting Officer Representative) certification and administration program for National FAM contracts;
- Develop a risk analysis of the alternatives as they relate to policy;
- Provide a description of program management roles and responsibilities, and alternatives to fulfill those roles;
- Produce a report as a result of the Task Group's work. This is that report.



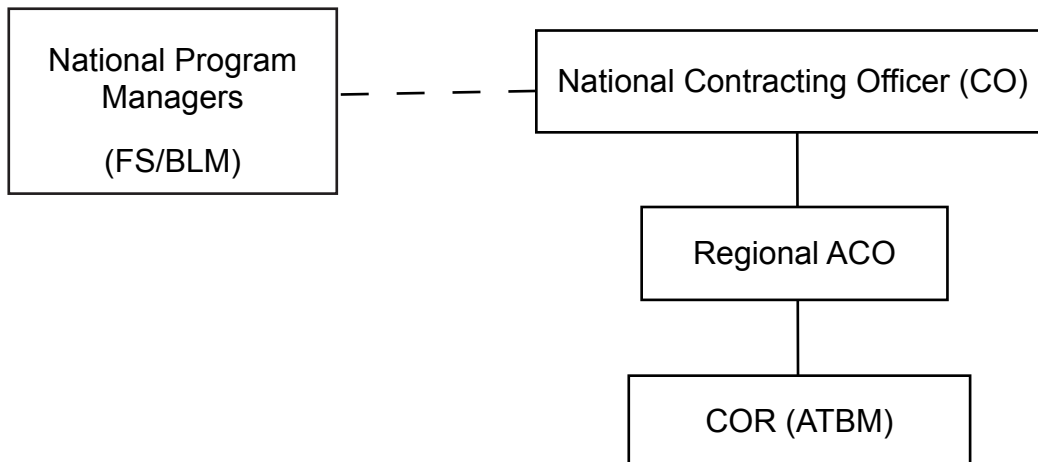
Current Situation

The current situation is best described as organizationally inconsistent. Some contract areas, most notably retardant, are well supported with dedicated program managers and a highly trained workforce of contract inspectors and representatives, while others, such as the catering contracts, are on the other end of the spectrum. The following is a description of the current situation for each contract area displaying these inconsistencies.



Aviation:

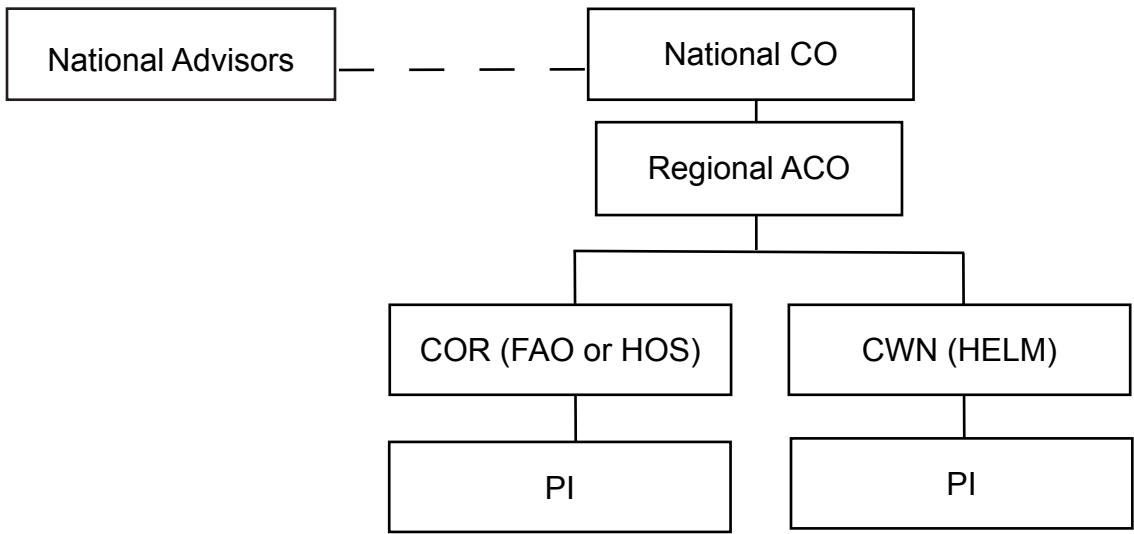
Air Tankers



Each Airtanker has a dedicated COR assigned for the season. If the assigned Airtanker is shifted to another Geographic Area (GA), the COR continues to receive flight and other information from the tanker base personnel. The COR is responsible for tracking the Airtanker and completing the flight invoice as well as forwarding payment to the Payment Center for their assigned aircraft. CORs for Airtankers are designated through a memo from the National CO. CORs typically attend training, presented by a Federal Acquisition Institute (FAI) certified contractor. Upon completion of training, a copy of their certificate is forwarded to the CO, for future information. There are designations of Contracting Officer's Technical Representatives (COTR) which are issued by the National CO. COTRs typically have program oversight responsibilities.

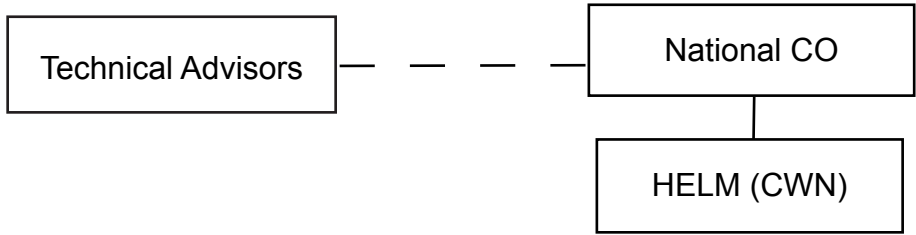


Exclusive Use Aircraft:



As illustrated, the exclusive use aircraft contract is well supported from both Fire and Aviation and Acquisition Management. Technical advice and support is provided from the National Office (though no one is specifically designated as the program manager) and in the GA through experts designated as CORs (by the ACO) that may also be helicopter managers, unit aviation officers, or helicopter operations specialists. Since no single person has been designated as the program manager, the National Contracting Officer (CO) has undertaken these responsibilities. To date this model has worked, but concerns over the future have arisen as numbers of qualified personnel have declined, and requirements for maintaining COR certification have escalated.

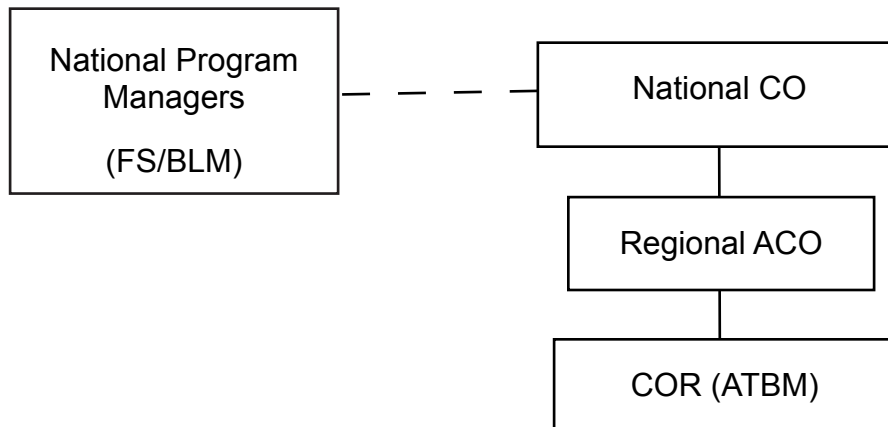
Call-When-Needed (CWN) Aircraft:



The CWN aircraft program is predicated on mobilization of a helicopter manager who, when dispatched by the National Interagency Coordination Center, becomes the COR. The Helicopter Manager ‘duties’ are outlined as an attachment in the National Contract requirement. Technical advice/program management is generally provided at the local unit level, or by the Incident Management Team (IMT) in the GA where the helicopter is located. There is no mechanism for assuring that the Helicopter Manager (HELM) is a technically qualified COR.

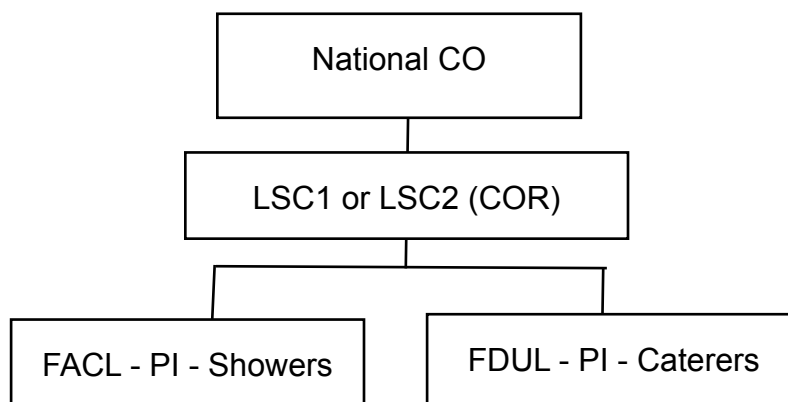


Retardant:



By far the most robust of the National Contract programs in that there are dedicated technical experts (Program Managers) who are designated as a COTR by the National CO. Designation of COR is via letter from the designated ACO. However, the same cannot be said for Mobile Retardant Plants. Since Mobile Retardant Plants are hired through the use of EERAs there are no CORs assigned even though the retardant utilized is under a National Contract. Responsibilities for project inspection often fall to a helicopter crewmember who may or may not have any training in contract administration.

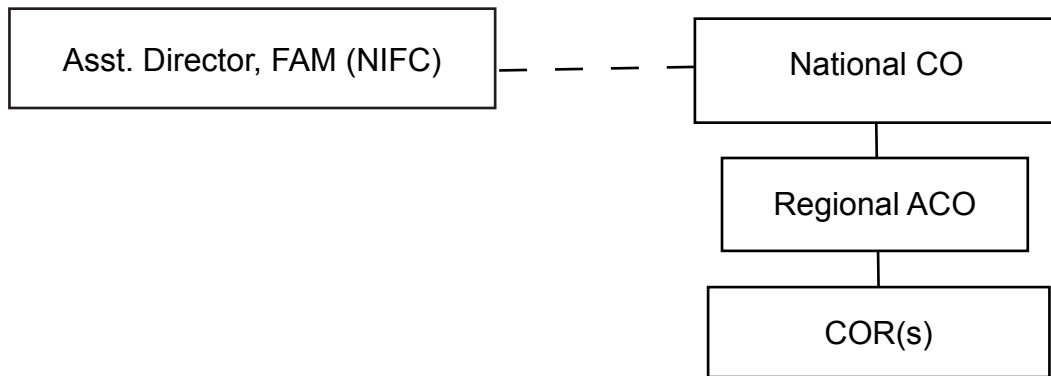
Catering and Shower Units:



The National Caterer and Shower contracts lack consistent technical oversight and support. All technical responsibility is placed on the National Contracting Officer. This structure makes assumptions regarding COR training that are not necessarily true. Not all Logistics Chiefs meet current criteria for being a COR. Rather, they are designated as a COR due to their position, but not designated as CORs by the CO as directed by agency policies and law.

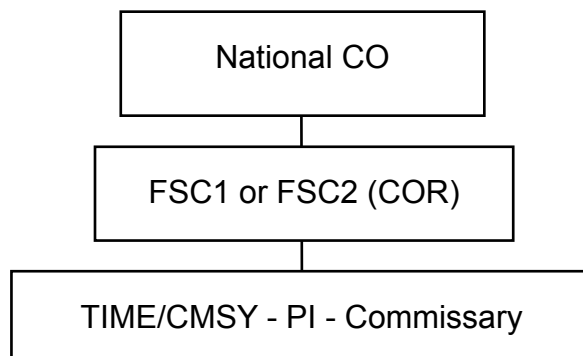


Crews:



The National Crew Contract has good support from AQM, but relies heavily on program management and technical advice from the field. While the organization chart shows the Assistant Director as the program manager, it is in reality an added duty without a formal designation. There is a heavy reliance on the Pacific NW Region for much of the Crew Contract technical support.

Commissary Units:



The National Commissary contracts lack consistent technical oversight and support. All technical responsibility is placed on the National Contracting Officer. This structure makes assumptions regarding COR training that are not necessarily true. Not all Finance Chiefs meet current criteria for being a COR. Rather, they are designated as a COR due to their position, but not designated as CORs by the CO as directed by agency policies and law.



Summary of the Current Situation:

National Fire and Aviation Contracts are being administered and managed in an inconsistent manner, often without benefit of designated technical advisors and program managers. In some instances, National Contracting Officers are placed in an untenable situation without benefit of any contracting support from the Regions, or technical support from the National Office. This is compounded by the fact that the CORs for the program may be designated by position and may or may not have the requisite qualifying training.

A variety of mechanisms have been designed to alleviate some of the problems that have been encountered with management of the national caterer and shower contracts. This includes the development the Contracting Officer Technical Representative (COTR). The approach was never completely adopted because it created confusion between the roles and responsibilities of COR vs. COTR with significant overlap between the two. Because of this, it is the recommendation of this Task Group that the COTR position be eliminated. This may increase capacity by freeing up people to fill other positions for which they are qualified.

The current capacity of qualified Level III Service CORs in the Forest Service is estimated at 1,000 (there are about 5,000 qualified CORs in the agency, 1,000 in construction and the remainder on the service side). The majority of these CORs are at the local unit level and may not be available for National Fire and Aviation contract administration. Meeting current and future agency requirements for COR training and certification for currently identified CORs will require an investment of approximately \$10 million dollars every 2 years. These figures are based on a \$2,000/person for 40 hours of training. And, there is no guarantee that the workforce needed to maintain this infrastructure would be available. Due to the cost of training, and the cumbersome nature of the current structure, the Task Group believes it is time to look at other organizational models with the goal of a more efficient and effective administration and management of FAM contracts.



Alternative Strategies

Alternative I - Minimal Change

Maintain existing models, but implement all current and future training requirements as identified by regulations and policy. This alternative requires considerable investment in training, certification, and recertification. It maintains the status quo, with inconsistent models being applied to different contracts. This leaves many of the National Contracting Officers without clear direction, program management, or technical expertise.

Pros

- None

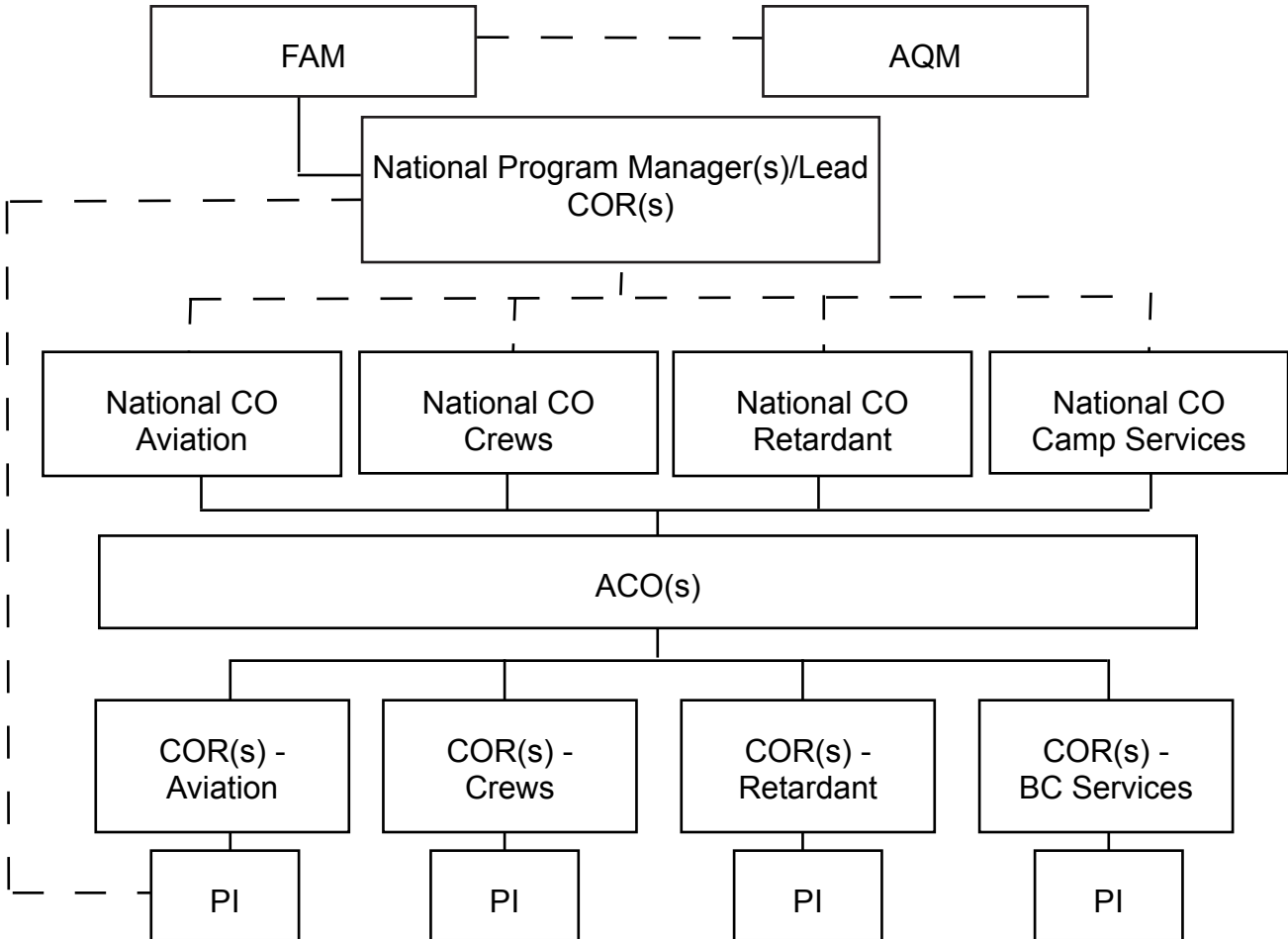
Cons

- To meet all legal and regulatory requirements will prohibit non-federal LSCs and FSCs from being CORs.
- Requires a significant investment in training, certification and recertification
- No relief for the National Caterer and Shower CO
- Inefficient use of CORs
- Continued reliance on militia CORs with inconsistent availability
- Requires the highest number of CORs in order to be successful
- Inconsistent management



Alternative II - National Retardant Template

Use the National Retardant Program as a model to be applied to all Fire and Aviation Management contracts.



This alternative adds program management responsibility to the National level by funding a Program Manager/Lead COR, and places greater responsibility on GA ACOs (may require more than one due to an increased workload). AQM and FAM in each GA would analyze the COR workload for each contract area, identify CORs by name, and ensure currency, training and certification requirements are realized. We anticipate a need for 1-3 CORs per contract, with the potential for some CORs to administer more than one contract. Each of the CORs would have a cadre of PIs. For example, Food Unit Leaders and Facility Unit Leaders would be Project Inspectors for the Base Camp Services. This model improves efficiency and cost effectiveness from the current situation because fewer CORs are required. This significantly reduces training and associated costs. We estimate that the number required nationally would be no more than 75 = \$150,000 every 2 years. Program management responsibilities would be realized, and the burden on National COs reduced.

Pros

- Consistency in application of same model for all FAM Contracts
- Improves program oversight
- ACOs ensure consistent administration and contract compliance.
- Provides program management for each contract with defined roles
- Meets all requirements for contract administration
- Decreased quantity of CORs (= less training/costs)

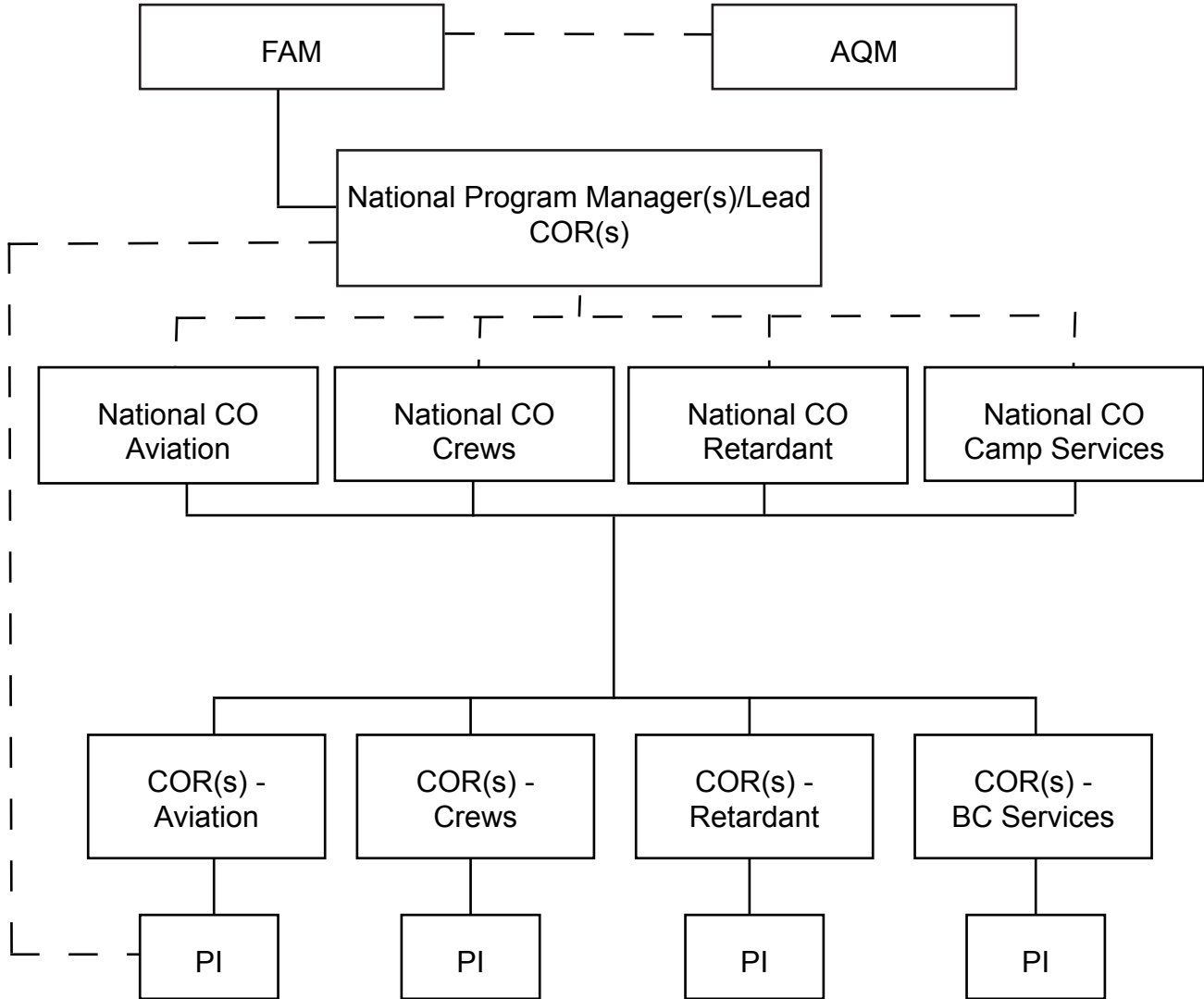
Cons

- Increased responsibilities/workload on GA ACOs, would more than likely require additional staffing
- May require additional staffing for National Program Managers (collateral duties)
- Additional training required for Program Managers to become CORs



Alternative III - Modified Retardant Template

The organization for Alternative III is identical to Alternative II with one exception: GA ACO is eliminated from the hierarchy. Consequently, GA CORs are linked directly to the National Contracting Officer in their respective area of responsibility.



Pros

- Consistency in application of same models for all FAM Contracts
- Better program oversight than in current situation
- Provides program management responsibility for each contract with defined roles
- Meets all requirements for contract administration
- Decreased quantity of CORs (=less training/costs)
- Decreased workload of ACOs

Cons

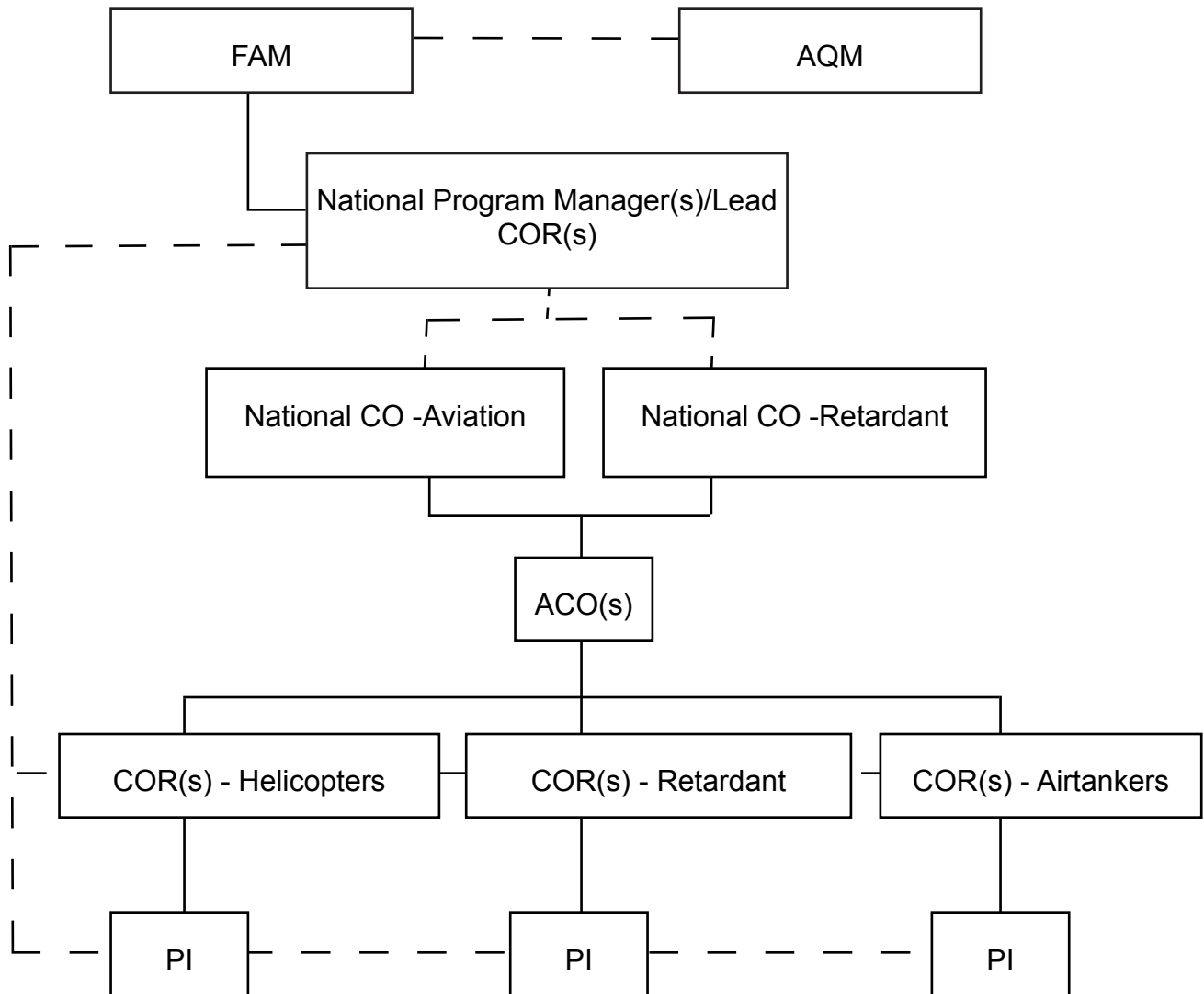
- Increased workload for some National Contracting Officer (Aviation and Retardant)
- May require additional staffing for National Program Manager
- Additional training required for Program Manager and CORs
- Less efficient feedback mechanism - only one Contracting Officer looking at contract
- ACOs no longer available for consultation on contract issues



Alternative IV - The 2 Model Alternative

Aviation Model

Alternative IV retains much of the current model for aviation resources, and places all other National Contracts under a “Services” Model.

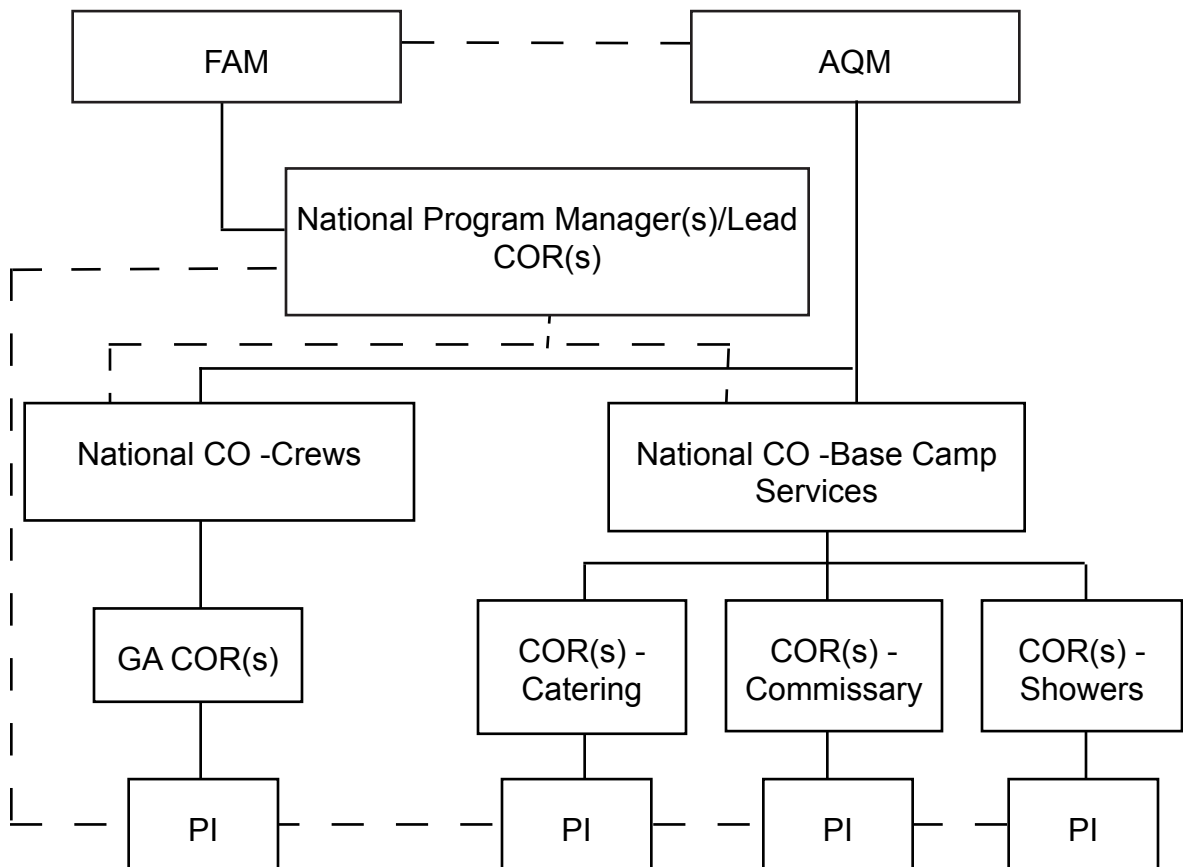


Each COR also has the full complement of Project Inspectors (i.e., Helicopter Managers, Tanker Base Managers, etc.)



Services

It's important to note that the only real difference in the two models is the GA ACOs role is retained as it currently exists in the Aviation Model. Other than that difference, it is the same as the modified retardant model.



Pros

- Maintains current aviation model
- Least intrusive of alternatives (least change)
- Improved oversight from existing situation
- Provides program responsibility for each FAM contract with defined roles
- Doesn't affect workload of ACO
- Decreased quantity of CORs (= less training/ costs)

Cons

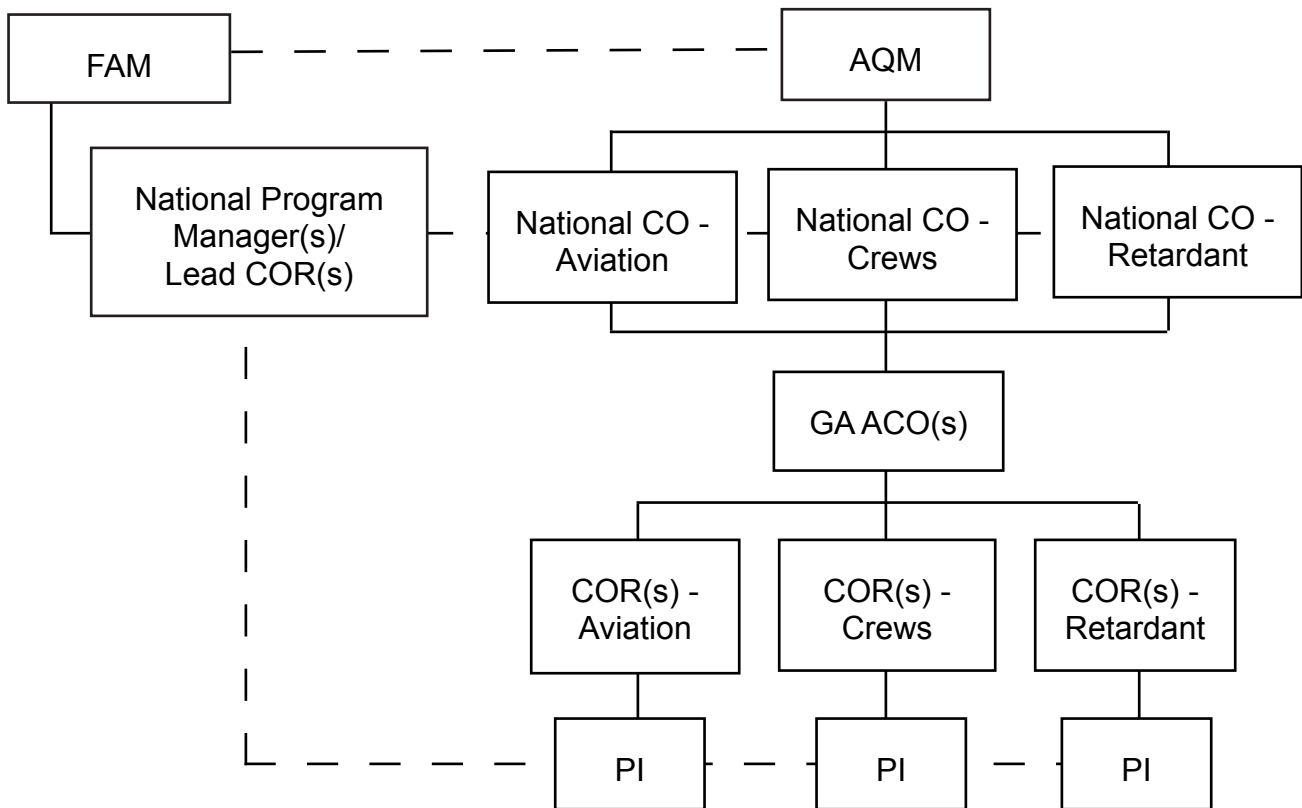
- Additional training required for Program Managers to become CORs
- Inconsistent organization (two different models)



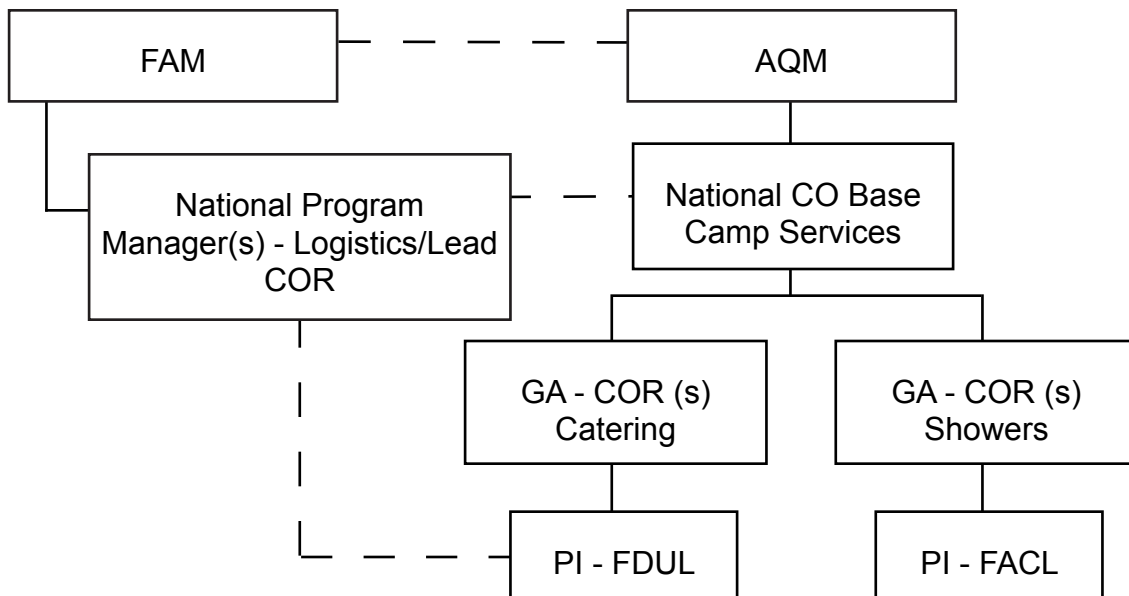
Alternative V - The ICS Alternative

Operations

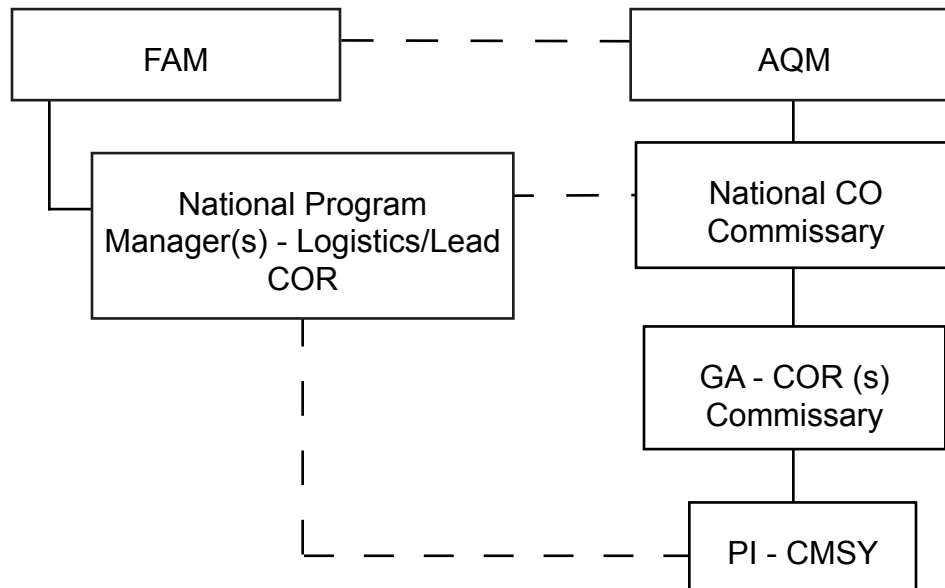
Alternative V follows the ICS model by placing National Contracts under ICS functional program areas.



Logistics



Finance



In addition, each COR continues to have the number of trained and qualified Project Inspectors to meet contractual obligations. The number of CORs required in a GA would be determined by the anticipated annual workload.

Pros

- Follows existing ICS Model
- Combines all operations resources under one Program Manager
- Combines all logistical resources under one Program Manager
- Consistent application of the way resources are delivered to the field
- Requires fewest number of Program Managers
- Consistent application of same model for all FAM Contracts
- Meets all requirements for contract administration
- Decreased quantity of CORs (= less training/costs)

Cons

- Would require some re-organization, and may require additional positions both Nationally and Geographically
- Additional training required for Program Managers to become CORs



Risk Analysis

The risks associated with maintaining the current organization are as follows:

We are in non-compliance with agency policy and direction concerning COR training and qualifications.

Already high and increasing, costs associated with training, certifying, recertifying, and maintaining currency for the number of CORs who are now responsible for dealing with fire and aviation contracts would continue to increase. It would be extremely difficult and costly to certify the large number of qualified ICS personnel who now have the responsibility for contract administration, which, due to the interagency nature of the work, includes both federal, and non-federal employees. The magnitude of the job would not only be financially irresponsible, but many of these non-federal personnel are prohibited from being designated as federal CORs.

Inadequate oversight and the lack of COR contract knowledge, skills and abilities, as well as more specific guidance on qualifications as determined by policy will likely create an increase in the number of claims brought against the government, and consequently increase the associated costs. The number of incorrect pay documents and associated claims will likely increase.

By being in non-compliance, we are putting the government at high risk from a liability perspective. The current organization places our national contracting officers at potential risk for losing warrant authority which puts our program at risk. The lack of trained and qualified CORs and PIs put our contractors at risk as well.

By redeeming our program management and COR responsibilities through adoption of any of the proposed alternatives, (with exception of Alternative I), will result in:

- Reduced costs for training and certification
- Increased payment accuracy and timeliness
- Reduced claims
- Reduced Congressional inquiries
- Compliance with agency policy and direction
- Redistributing workload to its appropriate level
- Protecting our financial interests as well as the public trust.

Costs associated with risks for maintaining current direction:

The costs associated with doing nothing far outweigh the cost of adopting any of the proposed alternatives with the exception of Alternative I. Many of these costs are intuitive and cannot be quantified without devoting larger resources to a study. The long term costs of continuing to train the militia workforce will increase. The dedicated workforce to accomplish our objectives and program responsibilities will decrease.

Reduced capacity will occur since non-federal employees can not be delegated the authority to act as a COR, further reducing the ability to fill positions on Incident Management Teams. Due to the lack of properly qualified personnel, the government may not be receiving the goods and services we are paying for. We may also be paying for more goods and services than we truly need.

With the emphasis on reducing large fire costs, we can no longer afford improperly administered contracts.

Costs associated with implementing one of the proposed alternatives:

Past studies have shown that a properly trained and qualified CO/COR workforce is more cost effective.

The adoption of any of the alternatives (with the exception of Alternative I), will have associated costs which will include development of training for project inspectors, and may require significant staffing changes. These costs may be mitigated by careful planning and implementation. There will be costs associated with ensuring the size of workforce necessary to redeem these contract administration responsibilities.



Preferred Alternative

Recommendation:

The group's preferred alternative is the ICS Alternative V, however, all of the alternatives were designed to succeed. All alternatives can be successful if properly staffed and managed. The group did not strongly believe that any one of the alternatives was much stronger than any of the others with exception of Alternative I, which we do not recommend at all.

The elements common to all alternatives and deemed by the task group to be of great importance include the following:

- Program Manager/Lead COR
- Provides “one-stop shopping”
- Lead shall coordinate all other program CORs
- Provides technical expertise
- Provides a qualified cadre of CORs
- Provides for a qualified cadre of Project Inspectors
- LSCs and FSCs shall no longer be required to perform as CORs
- Elimination of the COTR position

Implementation of the Selected Alternative:

- Identify the number of CORs needed to administer the contracts.
- Identify the ICS positions with project inspector responsibilities.
- Development of an Implementation Plan that would include a workload analysis
- Review training curriculum for PIs, and coordinate with National Wildfire Coordinating Group's Training Working Team to integrate any additional necessary training, or eliminate unnecessary training. This should include the identification of refresher training requirements.
- Develop and implement a periodic review of national contract management to ensure cost effective and efficient management



Roles and Responsibilities

Program manager shall be COR qualified and function as a coordinator and liaison to the AQM, COs, CORs, and PIs. This position(s) should be the conduit for all information, training and qualifications for all of the CORs. The Program manager would be the subject matter expert, technical specialist, and would provide support and work necessary to ensure the contracting officer has everything they need.

This position would also secure funding, provides technical information for determining type and level of competition. This person would also ensure training qualifications are met and tracked and would serve on technical evaluation committees.

Program Manager/ Lead COR	Contracting Officer's Rep. (COR)	Project Inspector	Administrative CO	Contracting Officer (C)
SME - Technical Expert				
Determines need for service				
Secures funding				
Provides advanced acquisition plan info.				
Analyze tech. requirements of services				
Conduct market research to establish tech. requirements & identify potential contractors				Conduct market research to establish tech. requirements and identify potential contractors
Provide tech. info for determining contract type & level of competition				
Establish solicitation tech. terms / conditions				
Prepares statement of work				
Secures funding and provides Commitment of Funds/Request for Contract Action				Prepares contract package
				Solicits requirement
Assist w/pre-proposal conference	Assist w/pre-proposal conference		Assists CO with conducting pre-proposal conference	Conducts pre-proposal conference

Program Manager/ Lead COR	Contracting Officer's Rep. (COR)	Project Inspector	Administrative CO	Contracting Officer (C)
Recommends COR				
Ensures training quals are met	Ensures training quals are met	Ensures training quals are met		
Serves on Tech. Evaluation Committees	Serves on tech. evaluation boards			
				Awards contracts
			Advise CO of issues/concerns	Designates ACO
			Designates CORs	Designates COR
	Assists in pre-work meetings		Conducts pre-work meetings	Conducts pre-work meetings
	Designates PI			
	Monitors and documents performance	Monitors and documents performance	Monitors and documents performance	Monitors and documents performance
	Advise CO/PM of work that has been accepted/rejected	Advise COR of work that is accepted/rejected		
	Ensures contractor enforces all health/safety requirements	Ensures contractor exhibits required posters		
	Ensures contractor assigns qualified experienced employees			
	Advise CO/PM of needs for change orders/equitable adjustment estimates		Issues contract modifications	Issues contract modifications
	Assists in evaluating claims	Document receipt of pay items	Settles claims	Settles claims
	Reviews payments docs & submits		Approves payments	Approves payments
	Issues work orders, stop work orders, & non-compliance			
	Labor compliance			
	Contract close-out	Contract close-out	Contract close-out	Contract close-out



Appendices

Charter

Answers to Charter Questions

Definitions

Charter

Contracting Officer's Representative Certification Implementation Strategy for Fire and Aviation Contracts Task Group

1. Task Overview

1.1 Background

The Forest Service, Acquisition Management Branch located at NIFC currently is responsible for the majority of the contracts used by all federal agencies on incidents for helicopters, large air tankers, retardants, mobile food and shower services, commissary, aircraft maintenance, and crews.

This program has grown over the past 30 years and the demands on the agency have continued to grow in terms of service and expectations. Fire and Aviation is responsible to provide program management and technical expertise to work in partnership with Acquisition Management to ensure the most effective and cost efficient contracting requirements, methods and procedures are being developed, implemented and managed. Unfortunately this support has not existed at an appropriate level.

The Contracting Officer relies on technical experts in order to facilitate the development, solicitation and award of a contract. In the fire community, this expertise is often not readily available or identifiable.

1.2 Purpose/Business Need

The purpose of this task group is to assist Fire and Aviation Management and Acquisition Management leadership in determining the technical and program needs required to develop a program of work that will address the issues surrounding this topic.

1.3 Scope

A number of questions, concerns and issues have been identified by various groups and individuals. The specific items the task group should analyze are listed below; as work continues there may be additional issues that arise.

Program Management:

- What are the program management roles and responsibilities (i.e., determining requirements, developing statements of work/specifications, developing criteria for source selection evaluations, securing funding, etc.)
- What type(s) of technical expertise is needed?

COR Certification:

- How many CORs are required to adequately administer FAM contracts?
- Who is appropriate to be a COR (ie skill, ICS position etc.)?
- What should be the appropriate mix of CORs vs. inspectors?
- Do CORs need to be on site for every type of contracted item?
- Are the DOI and USDA certification requirements close enough to be interchangeable?
- How should CORs be nominated, selected and certified, and who has responsibility for maintaining database of certified CORs?

Training:

- How should training be delivered – initial training and refresher?
- How should training be tracked?
- What are the various types of training required and/or available – ie. Inspector, COR, technical training, NWCG, etc.

Capacity:

- Assess available capacity, and how it is maintained when seasonal employees are not working
- How many CORs and inspectors are needed (by type and kind of contracts)?
- How can we ensure the appropriate skill type is dispatched? (for example an expert on shower contracts may not be on crew contracts)
- How many trainees should we have; how should they be dispatched?

Administration:

- Who should approve invoices for payments?
- How can claims be managed better & proactively?
- How should performance evaluations be conducted and reported?

1.1 Objectives

The primary objective of this task group is to 1) identify and clarify program management roles, responsibilities, and recommend alternatives for fulfilling those roles and responsibilities; and 2) provide alternatives on the various options available for implementation of the COR certification and contract administration program.

1.2 Sponsorship

This task group is chartered by Acquisition Management and Fire and Aviation Management.

2. Approach

The task group will collect data, perform analysis and develop recommendations based on new and existing data available. If specific analysis or information collection will be required that is beyond the ability of the group to accomplish due to time constraints or other factors, AQM or FAM personnel will be made available to assist.

2.1 Project Deliverables

The primary deliverables of the task group are:

1. Description of the “as is” situation – include number of existing certified and qualified CORs, inspectors etc. as well as a general description of the processes used today for certification and administration of FAM contracts.
2. More than one alternative for a strategy to implement an appropriate COR certification and administration program for FAM contracts addressing the issues in the “scope” section of this charter. The group may identify a preferred alternative.
3. A risk analysis on each of the developed alternatives.
4. Description of the program management roles and responsibilities, and alternatives to fulfill those roles.

2.1 Funding

Funding will be available for travel, and if necessary salary of task group members. Salary of task group members who are funded by WFPR will not be covered.

2.2 Oversight

Representatives from FAM and AQM will be available to answer questions, provide assistance and monitor timeline of the task. FAM and AQM will provide available reference materials and background information.

2.3 Task Group Membership

Representatives from:

IMT functions of Command, Logistics, Operations, Finance and Aviation.

Program areas of Acquisition Management, Incident Business, FAM

The group will select a Leader who will be the primary spokesperson and conduit to the Oversight representatives.

2.4 Timeline

Deliverables listed in Section 2.1 are requested by the end of calendar year 2006 (amended to March/2007). The task group may schedule meetings, conference calls etc. as necessary to accomplish the task.

3. Approvals

Prepared & Submitted By:

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5/23/2006
Date

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Recommended by:

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Acting Ass't Director for Operations
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5/31/2006
Date

Ronald R. Wester
Ass't Director for Operations
Acquisition Management

Date

Approved by:

/s/ Tom Harbour
Tom Harbour, Director
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6/9/2006
Date

/s/ Ronald Hooper
Ronald Hooper, Director
Acquisition Management
USDA Forest Service

6/6/2006
Date



Answers to Charter Questions

Program Management:

What are the program management roles and responsibilities (i.e., determining requirements, developing statements of work/specifications, developing criteria for source selection evaluations, securing funding, etc.)

This is addressed under “Roles and Responsibilities” section of this document

What type(s) of technical expertise is needed?

The Program Management/Lead COR function should have the following experience or qualities:

- Program management skills.
- The ability to become a high functioning COR
- Ability to work with CO's, CORs and PI's
- Good organizational skills
- Good problem solving skills
- Ability to work with contractors and deal with complex contract issues
- Must have a comprehensive understanding of the Incident Management structure and large complex incidents.
- Ability to read and comprehend complex contracts

COR Certification:

How many CORs are required to adequately administer FAM contracts?

The implementation plan and workforce analysis should address this question, but, the answer will depend on the following:

- The type of contract being administered, i.e. catering, showers, crews, retardant, aircraft etc.
- The complexity of the contract
- Volume of business
- The knowledge and skill level of the administering agency personnel/inspectors.
- Comfort level of the Contracting Officer – CO discretion

Who is appropriate to be a COR (i.e. skill, ICS positions etc.)?

Selection of a COR should be based on both their technical skills and contract administration background.

- Have an understanding and knowledge of the assigned project/type of work.
- COR training and prior contract administration for the complexity of the assigned project. Prior experience could be gained through assignments as an Inspector or COR. Training could be graduated, i.e. 24 hours of approved contract administration training and then serving as an inspector. Additional training then serving as a COR.
- It is not recommended to assign an individual as a COR just because they are COR qualified.

What should be the appropriate mix of CORs vs. Inspectors?

Based on the proposed alternatives and a proposal to dramatically change the way we've been doing business, the mix of CORs has been streamlined to a great extent. An evaluation needs to be made based on the question: At peak times, how many PIs are needed for the units that are being used? The complexity and type of contract and the volume of work/use will have some impact on the numbers needed to administer.

Do CORs need to be on site for every type of contracted item?

No, however a competent designated/agency representative with an understanding of the contract and basic contracting background should be on site to administer the contract or the sense to involve the COR or Contracting Officer. We have identified this on-site administrator to be the PI. When the contractor or government are not following the terms of the contract, the COR will become involved.

Are the DOI and USDA certification requirements close enough to be interchangeable?

Yes. Currently both the DOI and USDA are in the process of meeting new training requirements. Both the BLM and FS recognize project inspectors. How each Agency approaches these requirements may differ. Currently AMD/OAS has removed Project Inspectors and functions with assigned CORs and Alternate CORs

How should CORs be nominated, selected and certified, and who has responsibility for maintaining data base of certified CORs.

Both the BLM and FS Acquisition Organizations have a process in place for the selection and certification of CORs. Both Agencies also maintain a data base of Certified CORs.

The FS data base is at the Regional level and lists individual CORs by project type (service/construction), by complexity (I, II, III), and by Forest. How current the data base is depends if the information has been provided to the Regional Coordinator, (i.e., Did the supervisor/program manager submit the nomination documentation; and has the candidate provided all of their credited training documentation?).

Training:

How should training be delivered – initial training and refresher?

To be developed as part of the Implementation Plan

How should training be tracked?

To be developed as part of the Implementation Plan, however the Program Manager/Lead COR would be expected to oversee the CORs within his/her area of responsibility.

What are the various types of training required and/or available – i.e., Inspector, COR, technical training, NWCG, etc.

This remains to be evaluated and addressed as part of the Implementation Plan under the title of Training. Training standards must be identified and coordinated between AQM and FAM.

Training Analysis

Adoption of one of the alternatives is likely to result in the following implications for training:

- Less CORs at the field level means a significant decrease in training workload
- More Project Inspectors at the field level means a modest increase in training workload

Capacity:

Assess available capacity, and how it is maintained when seasonal employees are not working

We believe there are approximately 5,000 CORs with U.S. Forest Service. DOI numbers were not available. Management will have to determine whether or not they want to invest training into seasonal, temporary and casual employees.

How many CORs and inspectors are needed (by type and kind of contracts)?

The answer to this question should be identified by the Implementation Plan. Alternative options have changed the organizational infrastructure which affects the answer to this question. A workforce analysis should be performed as a part of the Implementation Plan.

How can we ensure the appropriate skill type is dispatched? (for example an expert on shower contracts may not be on crew contracts)

If one of the proposed alternatives is adopted, CORs will not be an ICS position. The dispatching of a COR to an incident will be organized and coordinated by the office of the Program Manager/Lead COR. The Program Manager/Lead COR function will be responsible, in coordination with the appropriate CO, for ensuring CORs are qualified and certified for their position as well as providing oversight for designations.

How many trainees should we have; how should they be dispatched?

Recruiting and arranging for COR training will be a function of the National Program Manager/Lead COR in concert with the appropriate CO. Dispatches to incidents will be coordinated by the Program Manager/Lead COR. A system for determining when a COR is dispatched to the field and how the dispatch is integrated into the established dispatch system should be addressed by the Implementation Plan and a workforce analysis.

Administration:

Who should approve invoices for payments?

The AQM policy group has indicated that due to the standard procedures for review of invoices at fire camp, the designated COR will not be required to sign invoices. The Facilities Unit Leader, the Food Unit Leader, Logistics Chief and helicopter manager will continue to provide review and signature for the approval of invoices and the acceptance of services. This will be stated in the specifications for invoice procedures.

How can claims be managed better & proactively?

We recommend that the national contracts include a statement which indicates that any warranted contracting officer working within the scope of their warrant may settle claims arising under the contract. The PIs should assist the CO in resolving requests for adjustments at camp before the contractor is demobed. A COR may be used to help facilitate this process.

How should performance evaluations be conducted and reported?

Electronic contractor performance evaluations are included in a new system called VIPR (Virtual Incident Procurement System) the Forest Service Fire Equipment, Service, & Supply Acquisition Analysis Team has under construction. The system should go on-line in 2009.



Definitions

ACO - Administrative Contracting Officer - Assignment of contract administration.

Administrative contracting officers (ACOs) may be assigned to carry out contract administration responsibilities in limited situations by the contracting officer with the concurrence of the cognizant chief of the contracting office. ACOs may not be designated in the same office as the contracting officer, unless there are extenuating circumstances and the justification is provided in the contract file. ACOs must have been able to enter into the contract in the first place or be approved by the head of contracting activity (HCA). This designation shall be made in writing to the designee, shall cite any needed limitations, and shall be distributed the same as the original contract.

~ Definition from the Federal Acquisition Regulations

CO - Contracting Officer

A federal employee delegated authority pursuant to FAR 1.6 and the Department of the Interior Contracting Officers Appointment Program to: award, administer, and terminate contracts, purchase orders, delivery orders, task orders and modifications; obligate Government funds; and make determinations and findings subject to the limitations of their written Certification of Appointment. Contracting Officer Technical Representative (COTR) are interchangeable.

~ Definition from the DOI Contracting Officer's Representative Program

GA - Geographic Area

References to GA were addressed in a rather generic sense. GAs in this document refer to the areas as defined in the National Interagency Mobilization Guide, however, depending on the workload analysis, some GAs may not require a COR staff while others may require several CORs who would perform duties on multiple contracts.

PI - Project Inspector

Inspector – A designated individual who has limited quality assurance responsibility either to:

- Examine and test contractors' manufactured supplies or services (including, when appropriate, raw materials, components, and intermediate assemblies);
- Determine whether supplies, services, or construction conform to contract requirements and legal requirements;
- Prepare correspondence, reports of inspections or investigations;
- Make recommendations for administrative or legal authorities, as needed; and
- Inspect government-owned equipment and materials in the hands of private contractors to prevent waste, damage, theft and other irregularities.

~ Definition from the DOI Contracting Officer's Representative Program