

Collection and Reporting of Contractor Past Performance Information

April 2012





Agenda

- Why Collect and Report Contractor Past Performance Information (CPPI)?
- New TMA Acquisition Policy
- Thresholds for Past Performance Data Collection
- Principles for Data Collection
- Guidance on Reporting
- General and TMA-specific Assessment Areas
- Best Practices
- Contractor Performance Assessment Reporting System (CPARS)
- Tools and References
- Questions

Why Collect and Report CPPI?

Regulatory Requirements

Collect:

FAR 42.1502 – Directs all Federal Agencies to collect contractor past performance information on eligible contracts

Report:

FAR 15.304 – Evaluate past performance information for negotiated competitive procurements

TMA Policy Requirements

TRICARE Acquisition Directive 42-01, (Contractor Past Performance Information (CPPI))

New TMA Acquisition Policy

- TMA Acquisition Management & Support (AM&S) has developed a new policy for Contractor Past Performance Information (CPPI).
- TAD 42-01 features some key local direction:
 - A TMA CO must serve as the Assessing Official for all awards issued by TMA.
 - When an external contracting activity is involved, the AO will be the external contracting activity CO responsible for the acquisition.
 - Contracting offices should document contractor performance during the course of the year to assist with development of annual CPARS assessments. COD-A uses the PAT tool, for example, to provide this functionality, but any number of other approaches would suffice.
- TMA developed Procedures, Guidance, and Instructions (PGI) <u>242.15-90</u> to provide additional detail.

TAD 42-02, "Monitoring Contractor Performance," provides direction on the real-time collection of performance information and the use of the PAT.

Thresholds for CPPI Collection

 Past performance assessments must be completed for contracts above these thresholds:

Business Sector	Dollar Threshold*
- Systems	> \$5,000,000
- Operations Support	> \$5,000,000
- Services	> \$1,000,000
- Information Technology	> \$1,000,000
- Health Care	> \$150,000

Source: <u>DoD CPARS Policy Guide</u>

^{*} Dollar thresholds apply to "as-modified" face value of contract & includes unexercised options

Principles for CPPI Collection

- CPPI is collected in Contractor Performance Assessment Reports (CPAR)
- Annual and final CPAR assessments are required
- Contractors granted a minimum of 30 days to comment
- Contractors entitled to independent level of Government review on disagreements (Reviewing Official)
- CPARs must be completed within 120 days of end of assessment period
- Support Contractors may access administrative info only (CPAR Blocks 1-15)
- Assessments are treated as Source Selection Information IAW the DoD CPARS Policy Guide and FAR 3.104 and 42.1503
 - Pre-Decisional in Nature
 - Protected During Collection and Throughout Entire Time Retained for Use
- Past Performance Information retained for 3 years after contract completion

Guidance on Reporting

- Integrity and uniformity of the assessment process is essential
- Employ consistent evaluation methodology
 - Across wide array of contractors and suppliers
 - Throughout the contract period of performance
 - Using consistent elements and ratings
- Substantiating narratives are required to establish that the ratings are credible and justifiable

General Assessment Areas and Questions

- Quality of Product or Service: Did services meet requirements of contract?
- **Schedule**: Was delivery schedule met? Were technical problems encountered and were they resolved in a timely fashion?
- Cost Control: Did contractor manage costs in an appropriate manner?
- **Business Relations:** Was contractor cooperative in working with Government to solve problems? Did contractor effectively recommend solutions? Was contractor responsive to administrative issues? Did contractor exhibit propensity to submit unnecessary contract change proposals with cost or price increases?
- Management of Key Personnel: How long did key personnel stay on contract and how well did they manage their portion of the contract?
- <u>Utilization of Small Business:</u> Did the contractor provided maximum practicable opportunity for Small Business to participate in contract performance consistent with efficient performance of the contract?

TMA-specific Assessment Areas

Rating Category	Mandatory sub-category	Optional sub-category (as applicable)
Quality of Product or Service	 Statement of Overall Performance Quality Assurance Activities Customer Service Other Specific Contract Requirements 	 Claims Processing Enrollment Medical Management Provider Networks Marketing
Schedule	 Submission of Contract Deliverables Timeliness of establishing/updating interfaces with DoD systems Schedule of Phase In/Out of Specific Programs 	Customer Service standards exceeded/met/not met
Cost Control	Change Order CostsCost ContainmentBusiness Systems	Optimize the MTF
Business Relations	 Partnership with Government Identification/Solution of Contract Issues Action on Contract Deficiencies Responsiveness to Government Inquiries Timeliness of Change Order Proposals Responsiveness to TMA Requests Oversight of Subcontractors 	Partnership with Government (TMA, TRO, MTF)
Management of Key Personnel	No identified sub-categories.	
Utilization of Small Business	No identified sub-categories.	

Best Practices

- Include performance expectations in the initial postaward meeting
- Provide feedback to contractors through recurring discussions and reviews
- Capture past performance regularly throughout the assessment period
- Complete assessments in a timely fashion upon the conclusion of the assessment period

What is CPARS?

- CPARS is the Contractors Performance Assessment Reporting System
- CPARS is a web-enabled application that collects, manages, and reports contractor performance information in the form of CPARs
- CPARS is one of several tools TMA is using to meet DoD's paperless contracting mandate
- The CPARS process includes checks and balances to facilitate the objective and consistent evaluation of contractor performance
- CPARS is intended for unclassified use only

Why Use CPARS?

- Automated collection and retrieval of Past Performance Information required by DoD
- CPARS is widely used within DoD
- CPARS feeds into the Federal Past Performance Information Retrieval System (PPIRS)
- Comprehensive web-site
- Extensive on-line training
- Help Desk services
- No cost to TMA

CPARS enables evaluators to repeatedly create reports that are:

- Accurate
- Fair
- Relevant
- Comprehensive
- Timely
- Consistent

CPARS Roles and Responsibilities

	Definition	Role	Responsibilities
•	TMA employee. Designated by HCA. Local resource for CPARS. TMA CPARS focal point is Acquisition Information Systems Manager (AISM).	CPARS Focal Point	 Register eligible contracts in CPARS within 30 calendar days of award. Provide CPARS training to TMA offices. Authorize access for Gov. and contractor personnel. Manage and maintain TMA CPARS accounts, and control and monitor reports.
	Government employee. For TMA-issued awards, the TMA Contracting Officer (CO) will serve as the AO unless otherwise designated by the TMA HCA. For external awards, TMA will specify in the applicable Acquisition Support Agreement that the AO will be the external contracting activity CO responsible for the acquisition.	Assessing Official (AO)	 Completion of the CPAR. Prepare, review, sign, and process the CPAR. Coordinate with all appropriate contractor performance monitoring sources of input prior to finalizing the CPAR.
	TMA employee with programmatic, technical, or other subject matter expertise and responsibility for monitoring contractor performance. The COR, Program Manager, or other Subject Matter Expert (SME), at the AO's discretion. Depending on the dollar value and complexity of the contract there may be multiple AORs.	Assessing Official Representative (AOR)	Provide technical, functional, quality assurance, specialty, or other subject matter expertise to assist the AO with the assignment of ratings, preparation of written narratives, and overall completion of the CPAR.
•	Individual designated by a contractor to represent the contractor in matters such as the review of CPARs.	Contractor Representative (CR)	Review the draft CPAR and provide comments.
•	Government employee. At least one level above the AO in same supervisory chain.	Reviewing Official (RO)	Reviews, provides comments, and ultimately approves the CPAR when there is a disagreement between the AO and the contractor.

CPARS System Access

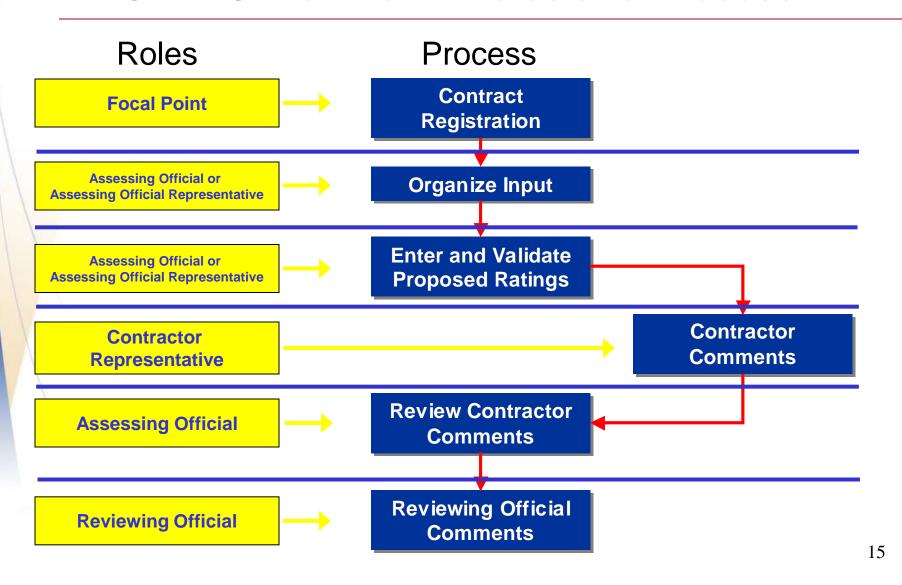
- CPARS Web Site: http://www.cpars.gov/
- 128 Bit encryption on Browser
- Valid user ID/password
- List of contract numbers
- Adobe Acrobat Reader

Send questions or comments about the website to:

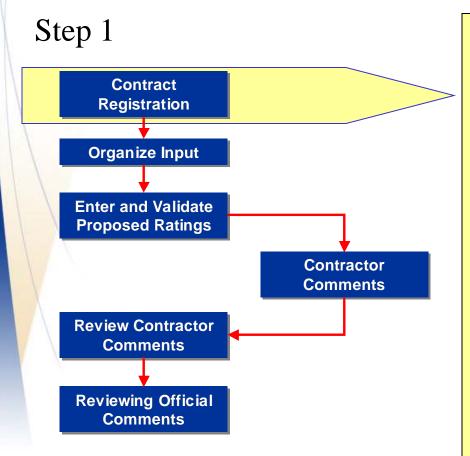
Customer Support Desk

Voice Phone: (603) 431-9460, extension 486 or email: webptsmh@navsea.navy.mil

CPARS Workflow - Roles and Process



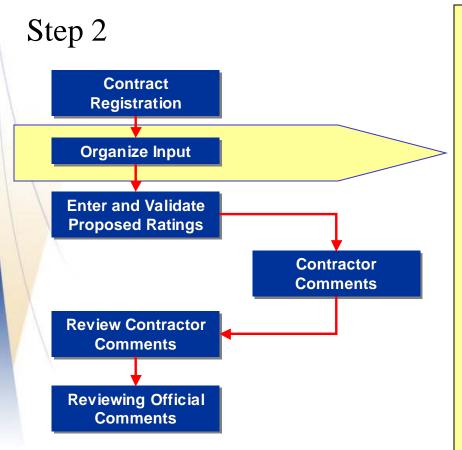
CPARS Workflow - Contract Registration



Contract Registration

- Performed by Focal Point and AM&S Contract Data Entry personnel
- Blocks 1-15 admin information registered shortly after contract award
- Many fields automatically populated after entering Cage code, etc.
- Assessing Official (AO) notified once contract is registered
- All fields subject to review and editing by AO

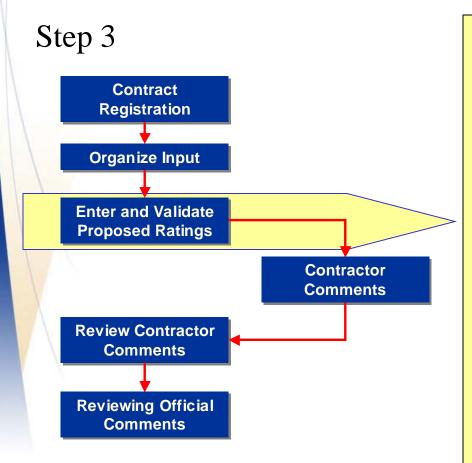
CPARS Workflow - Organize Input



Organize Input

- Document contract performance off-line as a text file (.txt format) and copy/paste into CPARS
- Start off-line documentation early
- Use MS Word spell check and thesaurus
- Use comments from existing Contract
 Status Reports and Progress Reviews
- Request input from experts and other Government officials with first hand knowledge of contractor performance
- All CPARS information is treated as "For Official Use Only/Source Selection Information"

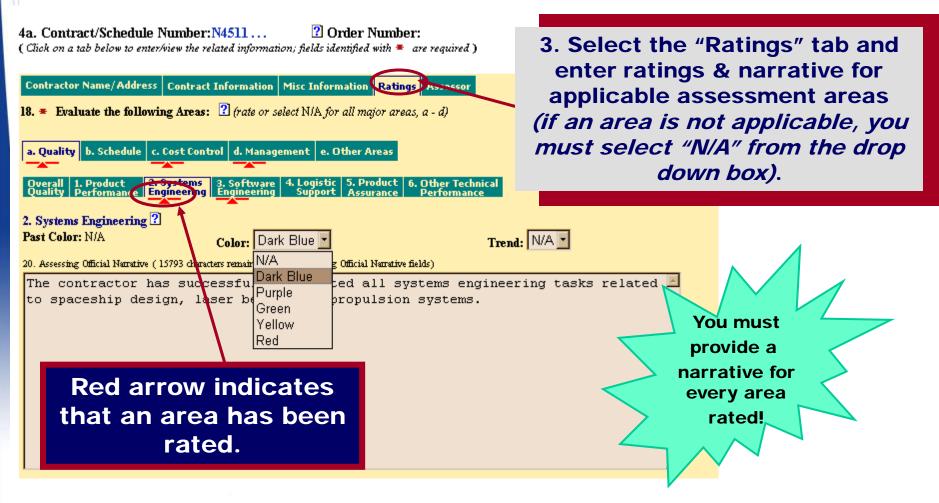
CPARS Workflow – Enter/Validate Ratings



Enter and Validate Proposed Ratings

- Upon first log in, check user profile and complete/update your profile as necessary
- Tell the whole story problems and successes
- Use <u>Quality Checklist</u> on CPARS web page as template to ensure narrative description matches performance assessment rating
- Pre-coordinate proposed rating with Reviewing Official (RO)
- Remember to <u>save work frequently!</u>

CPARS – Assessing Official



CPARS – Ratings

Rating	Definition (See DoD CPARS Guide for details)	
Exceptional (Dark Blue)	Meets contractual requirements and exceeds many, to Government's benefit; few minor problems	
Very Good (Purple)	Meets contractual requirements and exceeds some, to Government's benefit; some minor problems	
Satisfactory (Green)	Meets contractual requirements; some minor problems	
Marginal (Yellow)	Does not meet some contractual requirements; serious problems with no corrective actions	
Unsatisfactory (Red)	Does not meet most contractual requirements and recovery not likely in a timely manner	

CPARS – Assessing Official

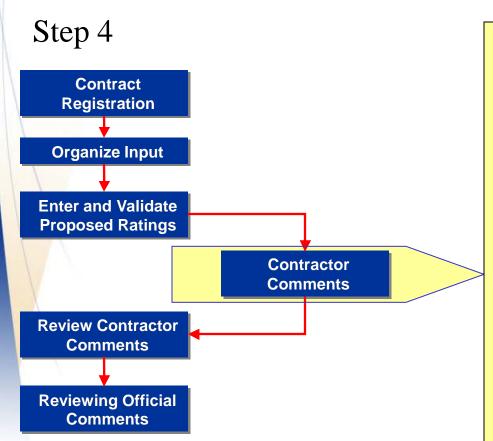
4. Complete the "Assessor" tab.

5. Select "Validate and Send to the Contractor".

An automatic email notification is provided to the Defense Contractor Rep when the CPAR is sent ... your Contractor Rep must have a valid email address in CPARS in order for you to send the CPAR.



CPARS Workflow Contractor Comments

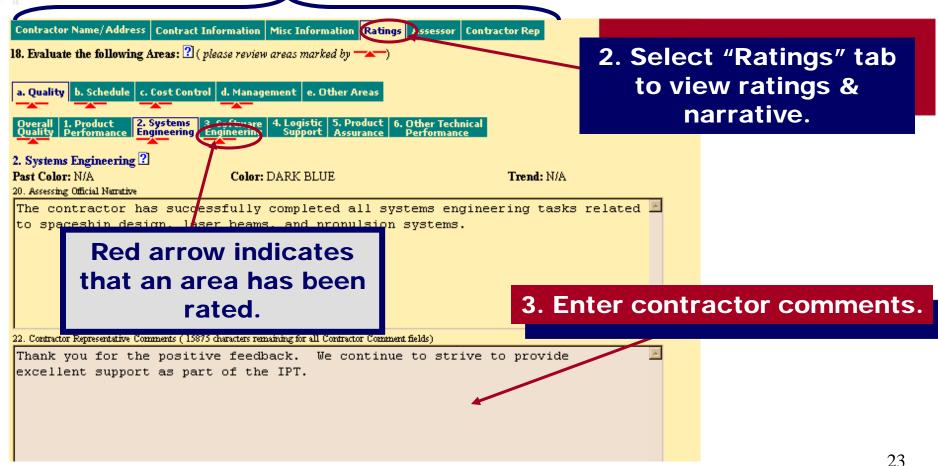


Contractor Representative Comments

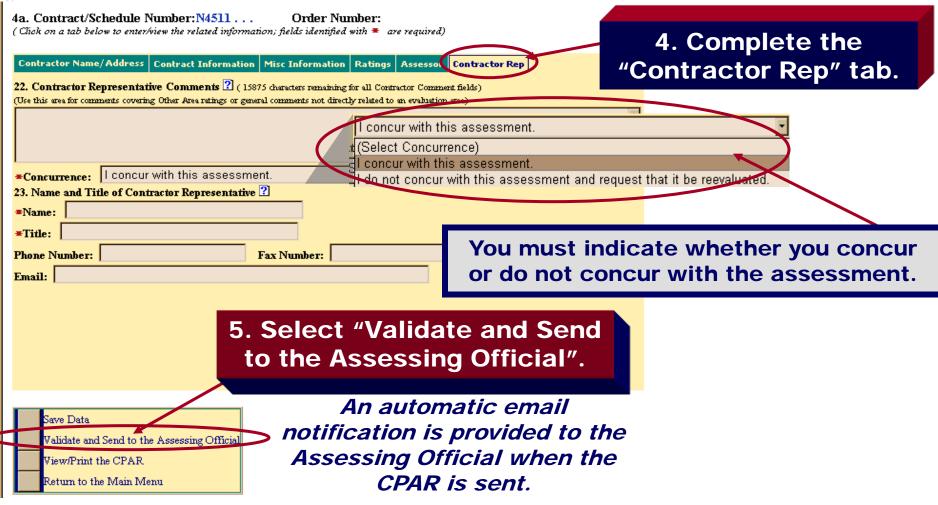
- If the Contractor Representative's (CR) e-mail address is correct, they will be notified when CPAR is ready for their review
- CR has 30 days to review, comment, and return the CPAR
- The CR must indicate "concur" or "do not concur" (with optional comment)
- CR narrative comments are optional
- If the CR fails to respond within 30 days, the AO gets an automatic email notification

CPARS – Contractor Rep

Defense Contractor Rep may view information on all tabs.



CPARS – Contractor Rep



CPARS Workflow Review Contractor's Comments

Step 5

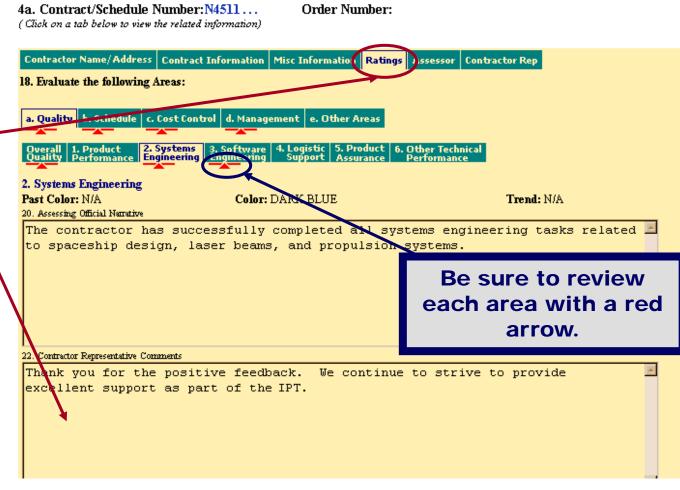


Review Contractor's Comments

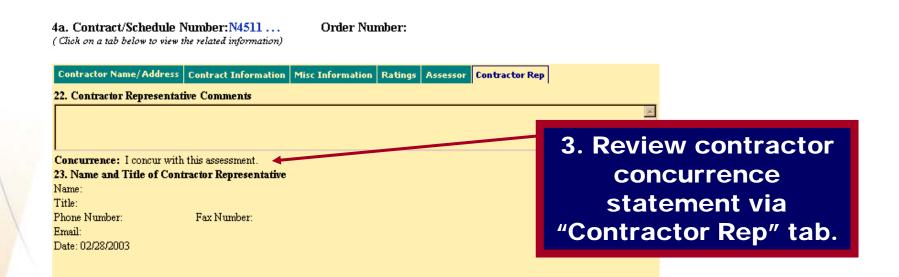
- CPAR is sent to the AO after CR action
- If the CR concurs, the AO will close the CPAR
- If the CR does not concur, the CPAR must go to RO
- If the CR fails to respond in 30 days the CPARS may be closed, and the AO comments become the official rating

CPARS – Assessing Official

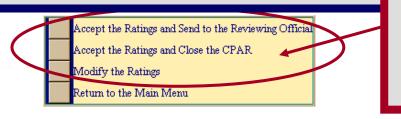
2. Review contractor comments via the "Ratings" tab.



CPARS – Assessing Official



4a. If the contractor concurred, accept the ratings and close the CPAR or send to a Reviewing Official if desired.



4b. If the contractor did not concur, you may modify the ratings & narrative if desired. You must send the CPAR to a Reviewing Official.

CPARS Workflow – RO Comments

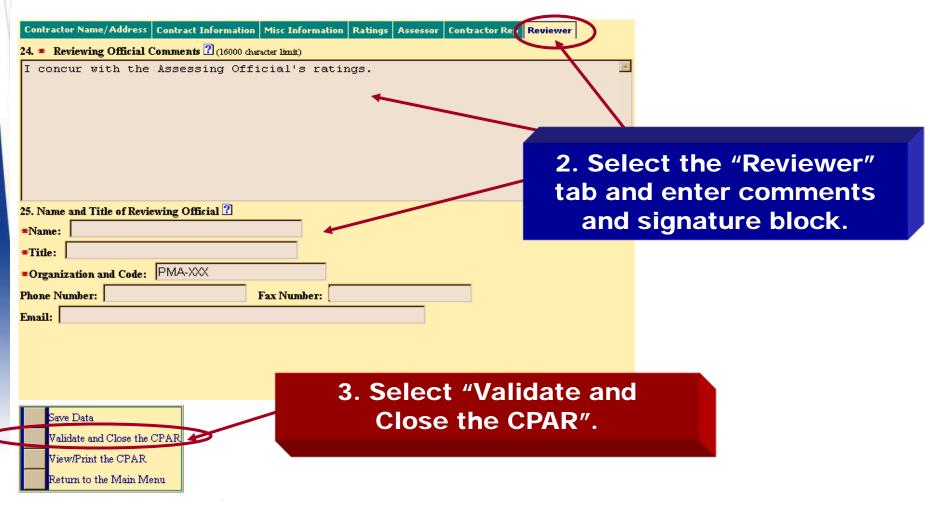
Step 6



Reviewing Official Comments

- RO is at least one level above AO and in their chain of command
- If the CR does not concur, the RO must enter a comment
- After commenting, a final rating is issued by the RO and the CPAR is closed
- After a CPAR is closed, the data is automatically uploaded to federal Past Performance Information Retrieval System (PPIRS)

CPARS – Reviewing Official



Keys to CPARS Success

- Collaborate, Communicate, and Coordinate!
 - Post-Award kick-off meeting
 - Guidance from Reviewing Official
 - Continuous off-line documentation and coordination (PAT system, for example)
- Keep E-Mail addresses up to date
- Involve TMA Contracting Officers and the TMA CPARS Focal Point if any questions or issues arise

CPPI/CPARS Tools and References

- CPARS Home Page (http://www.cpars.csd.disa.mil/cparsmain.htm)
- CPARS Users Manual (http://www.cpars.gov/cparsfiles/pdfs/CPARS_User_Manual.pdf)
- DoD CPARS Policy Guide
 (http://www.cpars.csd.disa.mil/cparsfiles/pdfs/DoD-CPARS-Guide.pdf)
- DoD Guide to Collection and Use of Past Performance Information (http://www.acq.osd.mil/dpap/docs/PPI_Guide_2003_final.pdf)
- Office of Federal Procurement Policy Best Practices for Collecting and Using Current and Past Performance Information (http://www.cpars.csd.disa.mil/cparsmain.htm)

Questions

 For questions related to policy on collection and reporting of contractor past performance information please contact the TMA AM&S Contract Policy and Pricing Branch:

By phone: (303) 676-3453

By email: policyweb@tma.osd.mil

