



## U.S. SECURITIES AND EXCHANGE COMMISSION FY10 SERVICE CONTRACT ANALYSIS

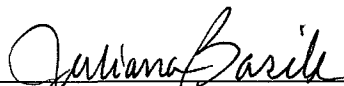
**December 2011**

1. Per OFPP's memorandum of November 5, 2010 concerning FY2010 service contract inventories, we are providing the following information on our FY10 Service Contract Analysis.
2. We studied the following product and service codes (PSCs) depicted in the chart below. Each PSC represents at least 1% of SEC's obligated service dollars. We developed a survey that we sent to the contracting officer representatives appointed to the SEC service contracts identified in the chart, which represents 12 SEC contractors and 53% of the obligated service dollars.

PSC	Description	\$ Obligated
D399	OTHER ADP & TELECOMMUNICATIONS SVCS	\$65,503,458
R424	EXPERT WITNESS	\$18,554,445
R408	PROGRAM MANAGEMENT/SUPPORT SVCS	\$14,478,378
D307	AUTOMATED INFORMATION SYSTEM SVCS	\$ 9,635,885
R799	OTHER MANAGEMENT SUPPORT SVCS	\$ 9,071,720
R499	OTHER PROFESSIONAL SVCS	\$ 8,788,850
R703	ACCOUNTING SVCS	\$ 3,013,687
D306	ADP SYSTEMS ANALYSIS SVCS	\$ 2,530,732
D310	ADP BACKUP AND SECURITY SVCS	\$ 1,862,415

3. Our findings concluded that SEC
  - a. has no personal services contracts;
  - b. is not using contractor employees to perform inherently governmental functions;
  - c. is not using contractors to perform functions closely associated with inherently governmental functions;
  - d. ensures that contracting officers and their representatives have the training and management support to ensure that contractor's work does not change or expand during performance to become inherently governmental;
  - e. does not use contractor employees to perform critical functions in such a way that could affect the ability of the agency to maintain control of its mission and operations; and
  - f. has sufficient internal agency resources to manage and oversee its contracts effectively.
4. Although the SEC did not identify any weaknesses or challenges, we are committed to providing timely and relevant training to our acquisition personnel to ensure the continued effective management and oversight of our service contracts.

**Concurrence:**

  
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Juliana Basile, Senior Procurement Executive  
Office of Acquisitions

12/20/2011  
Date

  
\_\_\_\_\_  
Lacey Dingman, Associate Executive Director,  
Office of Human Resources

12/20/11  
Date

Signature on File  
\_\_\_\_\_  
Thomas Bayer, Director,  
Office of Information Technology

12/29/11  
Date