



EXECUTIVE OFFICE OF THE PRESIDENT

OFFICE OF MANAGEMENT AND BUDGET
WASHINGTON, D.C. 20503

OFFICE OF FEDERAL
PROCUREMENT POLICY

September 6, 2011

MEMORANDUM FOR CHIEF ACQUISITION OFFICERS SENIOR PROCUREMENT EXECUTIVES

FROM: Daniel I. Gordon
Administrator

SUBJECT: Revisions to the Federal Acquisition Certification for Contracting Officer's Representatives (FAC-COR)

Strengthening the acquisition workforce is critical to ensuring that the government gets the best value for the more than \$500 billion of goods and services it procures annually. Each member of the acquisition workforce plays a critical role, including Contracting Officer's Representatives (CORs), who ensure that contractors meet the commitments of their contracts. CORs are often the first to recognize when a program or contract is under-performing, and are increasingly being asked to manage high-value, complex contracts that involve varying degrees of risk. To be sure they are trained and developed appropriately, this memorandum revises and replaces the Office of Federal Procurement Policy's (OFPP) requirements for the Federal Acquisition Certification for COTRs (FAC-COTR),¹ originally issued in November 2007, to establish a risk-based, three-tiered certification program for civilian agencies² that better reflects the important role of the COR. The term "COTR" is being changed to "COR" to align with the Federal Acquisition Regulation (FAR) which now incorporates a definition for "Contracting Officer's Representative" and includes designation of a COR as part of a Contracting Officer's responsibilities.³ The new FAC-COR requirements will be effective January 1, 2012, and agencies should begin developing guidance to ensure their CORs are appropriately certified.

As part of OFPP's October 2009 Acquisition Workforce Development Strategic Plan,⁴ a multi-agency Functional Advisory Board (FAB) was established to improve the FAC-COR program and make recommendations to more effectively manage the COR workforce. The attached revisions to the program reflect the recommendations from this board, and input from the Chief Acquisition Officers Council, the Federal Acquisition Institute (FAI), and others. The new program and the additional language in the FAR are designed to strengthen the acquisition workforce to improve program outcomes, consistent with the President's March 2009 Memorandum on Government Contracting,⁵ and reflects the need to improve the management of high-risk contracts, such as those for large information technology contracts, consistent with OMB's "25 Point Implementation Plan to Reform Federal Information Technology

¹ <http://www.whitehouse.gov/sites/default/files/omb/procurement/memo/fac-cotr.pdf>

² The new requirements apply to all executive agencies, except for the Department of Defense.

³ See FAR Parts 1.602-2, "Responsibilities" and 2.101, "Definitions."

⁴ http://www.whitehouse.gov/sites/default/files/omb/assets/procurement_workforce/AWF_Plan_10272009.pdf

⁵ http://www.whitehouse.gov/the_press_office/Memorandum-for-the-Heads-of-Executive-Departments-and-Agencies-Subject-Government/

Management.”⁶ OFPP will work with FAI and the FAB to identify additional classroom training and development opportunities to continuously improve this certification program.

Where the previous FAC-COTR had just one level of certification for all CORs, the new FAC-COR has three levels of certification with varying requirements for training, experience, and continuous learning, depending on the types of contracts being managed. Generally, in accordance with the attached policy and agency guidance, CORs should be developed and assigned as follows:

1. Level I – 8 hours of training and no experience required. This level of COR is generally appropriate for low-risk contract vehicles, such as supply contracts and orders.

2. Level II – 40 hours of training and one (1) year of previous COR experience required. These CORs may be called upon to perform general project management activities and should be trained accordingly. This level of COR is generally appropriate for contract vehicles of moderate to high complexity, including both supply and service contracts.

3. Level III – 60 hours of training and two (2) years of previous COR experience required on contracts of moderate to high complexity that require significant acquisition investment. Level III CORs are the most experienced CORs within an agency and should be assigned to the most complex and mission critical contracts within the agency. These CORs are often called upon to perform significant program management activities and should be trained accordingly. At a minimum, those CORs for major investments, as defined by OMB Circular A-11, shall generally be designated as Level III CORs.

FAI, the Defense Acquisition University (DAU), private vendors, and other government agencies offer a variety of online and classroom courses to satisfy the new training requirements, and sample curricula are provided at the FAI website.⁷ CORs certified under the previous program are considered to have certain equivalencies under the new program, as explained in more detail in the attached.

The FAC-COR is only one component of strengthening the COR function. Equally important is selecting the right individual to be a COR, ensuring that the COR understands the importance of his/her role, providing the individual adequate time and resources to perform the COR function, and building a culture of effective collaboration and communication between the Contracting Officer and COR. If you have questions regarding the FAC-COR program, please contact Joanie Newhart at (202) 395-4821 or jnewhart@omb.eop.gov.

Attachment

cc: Chief Information Officers
Chief Human Capital Officers
Chief Financial Officers
Acquisition Career Managers

⁶ <http://www.cio.gov/documents/25-Point-Implementation-Plan-to-Reform-Federal%20IT.pdf>

⁷ FAC-COR sample curricula are available at www.fai.gov under the Certification tab.

Federal Acquisition Certification for Contracting Officer's Representatives (FAC-COR)

1. Purpose. The purpose of the Federal Acquisition Certification for Contracting Officer's Representatives (FAC-COR) is to establish general training, experience and development requirements for CORs in civilian agencies that reflect the various types of contracts they manage. For the purpose of this policy, the term "COR" refers not only to positions technically designated as CORs, but also to Contracting Officer's Technical Representatives (COTRs), Technical or Task Monitors (TMs) and others who ensure proper development of requirements and assist Contracting Officers (COs) in managing their contracts. This certification program will promote continued development of essential business and technical competencies for CORs.

The revised FAC-COR program is effective January 1, 2012.

2. Authority. The FAC-COR is issued pursuant to the Office of Federal Procurement Policy (OFPP) Act, 41 U.S.C. § 1101 et. seq., and OFPP Policy Letter 05-01, which established a requirement for federal acquisition certification programs.

3. Background. Since the designation of CORs as part of the acquisition workforce in the Services Acquisition Reform Act of 2003 (SARA), the federal government has taken steps to develop and strategically manage this critical portion of the acquisition workforce. In November 2007, OFPP issued the first Federal Acquisition Certification for COTRs (FAC-COTR),¹ and in October 2009, OFPP issued the Acquisition Workforce Development Strategic Plan,² which established a multi-agency Functional Advisory Board (FAB) to improve the FAC-COR program and make recommendations to more effectively manage the COR workforce. This FAC-COR revision, which replaces the original program, is a step toward continuous improvement of the COR function.

4. Applicability. The FAC-COR program applies to all executive agencies, except the Department of Defense (DoD).³ This is a federal certification and, as such, the certification shall be accepted by all civilian agencies as evidence that an employee meets core training and experience requirements to perform COR functions, though authorization to perform COR functions must be in accordance with agency policy.⁴

5. Certification Program Administration.

a. General. In accordance with SARA, the Chief Acquisition Officer (CAO), in consultation with the Senior Procurement Executive (SPE) and other appropriate agency officials, is responsible for developing and maintaining an acquisition career management program to ensure an adequate professional workforce. As such, the certification process shall be managed by each

¹ <http://www.whitehouse.gov/sites/default/files/omb/procurement/memo/fac-COR.pdf>

² http://www.whitehouse.gov/sites/default/files/omb/assets/procurement_workforce/AWF_Plan_10272009.pdf

³ Department of Defense (DoD) will continue to follow DoD policy.

⁴ As necessary, civilian agencies covered by this FAC-COR policy may require additional training and experience, beyond the appropriate FAC-COR requirements.

agency. The CAO may delegate, in writing, to no lower than the Head of the Contracting Activity (HCA), certain functional responsibilities as needed to ensure effective and efficient management of this program. The agency Acquisition Career Manager (ACM) is responsible for administering the agency certification program in accordance with this guidance.

b. Waiver Authority. The agency's CAO may extend in writing, on a case-by-case basis, the date upon which a COR must be certified by an additional six months, if it is in the best interest of the agency. Additionally, the CAO may waive all or part of the FAC-COR requirements in writing, on a case-by-case basis, if granting the waiver is in the best interest of the agency. A written justification shall include the reason for and conditions of the waiver, and the agency's ACM or designee shall maintain all supporting documentation.

c. Oversight and Continuous Improvement. The OFPP Associate Administrator for Acquisition Workforce Programs, in consultation with the Chief Acquisition Officers Council (CAOC), the Federal Acquisition Institute (FAI), the FAI Board of Directors, the Interagency Acquisition Career Management Council (IACMC), the COR FAB and other organizations, as appropriate, shall:

- provide general program oversight and direction,
- periodically revalidate the COR competencies,
- identify additional classroom training and development opportunities, and
- recommend improvements to this FAC-COR policy to the Administrator for Federal Procurement Policy to ensure the program reflects the needs of all civilian agencies.

Changes to the program will be made through an update of this policy document. FAI will issue guidance and other information through its website,⁵ and, periodically, will review existing agency programs against the program's requirements to ensure consistency of implementation across agencies.

6. Certification Requirements for Contracting Officer's Representatives (CORs). The FAC-COR shall consist of: (1) competency-based core training and assignment-specific training to achieve certification, (2) experience requirements for Level II and III certifications, and (3) continuous learning to maintain certification. Obtaining the FAC-COR makes an individual eligible for appointment as a COR, which shall be made in writing by the CO, but does not mandate an individual's appointment as a COR; the CO shall make this determination in accordance with agency need.

a. General. The FAC-COR program contains three levels of certification to allow for appropriate training and experience for CORs managing a range of contract vehicles, from low-risk contracts (such as supplies) to high-risk, complex acquisitions (such as IT systems). New CORs shall be designated within six months of assignment.

b. Transition of Current CORs Absent agency action, current CORs shall be grandfathered in as Level II CORs. At its discretion, and in accordance with agency policy describing the

⁵FAC-COR guidance and other information will be available at www.fai.gov under the Certification tab.

decision process, an agency may decide to: (1) grandfather some current CORs in as Level I CORs; (2) grandfather some current CORs in as Level II CORs; and/or (3) reassign some current CORs who meet the new requirements for Level III CORs at Level III after validating their experience and competency to the ACM or designee (see Section 6.e). Agencies have until the effective date to determine if and how to reassign their current CORs. Upon being grandfathered in or reassigned, CORs will follow the continuous learning requirements for their new COR level. These transition requirements are detailed in Attachment 2.

c. Competencies for CORs. The business and technical competencies for CORs are available at the FAI website⁶ and reflect the results of a 2003 study conducted by FAI and a 2008 review by FAI and a multi-agency working group. The COR FAB will periodically revalidate these competencies and the COR certification policy will be updated as needed. Changes to the competencies will be available on the FAI website.

d. Appointment. The program office shall normally provide a written nomination for a technically qualified, responsible and certified COR to the CO. Determining who is most appropriate to be the COR is the responsibility of the CO and CORs shall be appointed in writing by the CO. It may be reasonable to have a COR for a task or delivery order in addition to the COR for the underlying contract; in that case, the roles and responsibilities of each should be made clear in both the COR delegation letters and the contract terms and conditions.

Best Practice: If an individual is performing pre-award tasks, such as requirements determination and proposal evaluation, it is recommended that (s)he be issued a COR appointment memorandum at that time that addresses both pre-award and post-award responsibilities.

The COR level required for a particular acquisition shall be determined by the CO during acquisition planning. To assist in this determination, the CO may find the COR Appointment Criteria Matrix in Attachment 3 helpful. The matrix identifies risk factors, such as complexity and contract type, for COs to consider when appointing a COR to a contract. Assessing the level of risk for each factor can help COs analyze the overall level of risk for the contract. Use of this matrix will promote consistency across agencies, and agencies are invited to add criteria to the matrix as appropriate for their situation. CORs assigned to various contracts shall be certified at the highest level required by any one contract within their portfolio.

Best Practice: At the time of appointment, the CO should meet with the COR in person, if practical, to ensure the COR understands his/her duties, roles and responsibilities in regard to the contract and in regard to agency specific processes and requirements. CORs should be informed that their duties, responsibilities, and obligations are limited to those articulated in their appointment letter and must be exercised in accordance with agency policies.

e. Training and Experience: CORs must have the minimum training and experience, as described below, and must maintain their skills currency through continuous learning. Agencies

⁶ FAC-COR competencies are available at www.fai.gov under the Certification tab.

may add additional training and experience requirements, but the FAC-COR shall be recognized by all civilian agencies as evidence that an employee meets core training and experience requirements to perform COR functions.

1. Level I – 8 hours of training and no experience required. This level of COR is generally appropriate for low-risk contract vehicles, such as supply contracts and orders.

2. Level II – 40 hours of training and one (1) year of previous COR experience required. These CORs may be called upon to perform general project management activities and should be trained accordingly. This level of COR is generally appropriate for contract vehicles of moderate to high complexity, including both supply and service contracts.

3. Level III – 60 hours of training and two (2) years of previous COR experience required on contracts of moderate to high complexity that require significant acquisition investment. Level III CORs are the most experienced CORs within an agency and should be assigned to the most complex and mission critical contracts within the agency. These CORs are often called upon to perform significant program management activities and should be trained accordingly. At a minimum, those CORs for major investments, as defined by OMB Circular A-11, shall generally be designated as Level III CORs.

COR certification requirements are detailed in the chart below.

**New CORs as of
January 1, 2012**

- **Level I Certification**
8 hours of training, no experience required
Continuous learning: 8 CLPs every 2 years
- **Level II Certification:**
40 hours of training*, one year of experience required
Continuous learning: 40 CLPs every 2 years
- **Level III Certification:**
60 hours of training*, two years of experience required
Continuous learning: 40 CLPs every 2 years

*Training or continuous learning from one level may be applied to training requirements for the next higher certification level. Experience may have been obtained prior to the effective date of this memo.

Levels I and II are not incremental. If a COR meets the requirements of Level II certification, (s)he can be certified at Level II without prior Level I certification. However, in order to be certified at Level III, it is strongly recommended that CORs have prior certification at Level II.

Initial training for new CORs must include, at a minimum, a course covering COR roles and responsibilities as well as fundamental contract rules and regulations. In addition, it is strongly recommended that this training be provided in a classroom setting. For other CORs, any combination of classroom or online training that contributes to learning the competencies is acceptable. Required training should be determined by agency policy and the agency's Acquisition Career Manager (ACM). Individual CORs should consult with their supervisor and the Contracting Officer to determine their specific training needs. Training options to consider – classroom, online, or a mix of both – are provided at FAI's website.⁷

In addition to gaining experience as a COR, experience may be gained by performing acquisition-related activities, such as performing market research; writing specifications, Statements of Work or Statements of Objectives; developing quality assurance surveillance plans; assisting the CO or COR as a technical monitor; and participating as a subject matter expert on a technical evaluation team. Recognizing that COR and other acquisition-related activities are not generally full-time duties for individuals other than contracting professionals, experience may be gained by performing these activities on a part-time basis. As a prerequisite for Level II and Level III certification, the COR nominee shall validate to the agency Acquisition Career Manager (ACM) or designee in accordance with agency procedures that (s)he has gained the required experience and obtained the technical competencies required (see paragraph 6.c, above). Templates to assist agencies in implementing this process will be available on the FAI website no later than October 31, 2011.⁸

f. Continuous Learning: To maintain a FAC-COR, CORs are required to earn the following continuous learning points (CLPs) of skills currency training every two years, either beginning with the date of their certification⁹ or in a standard cycle as determined by their agency. ACMs shall monitor the continuous learning requirements for employees holding FAC-CORs to ensure they meet these requirements. Additional guidance on determining continuous learning points is available on the FAI website¹⁰. It is the COR's responsibility to ensure that his/her continuous learning requirements are met.

Level I – 8 hours of CLPs every 2 years

Level II – 40 hours of CLPs every 2 years

Level III – 40 hours of CLPs every 2 years

It is not intended that CORs retake their original COR training classes for continuous learning. Rather, CORs should take courses relevant to the work they are performing as a COR. For

⁷ FAC-COR training options are available at www.fai.gov under the Certification tab.

⁸ FAC-COR templates will be available at www.fai.gov under the Certification tab.

⁹ Currently required in the Federal Acquisition Institute Training Application System (FAITAS)

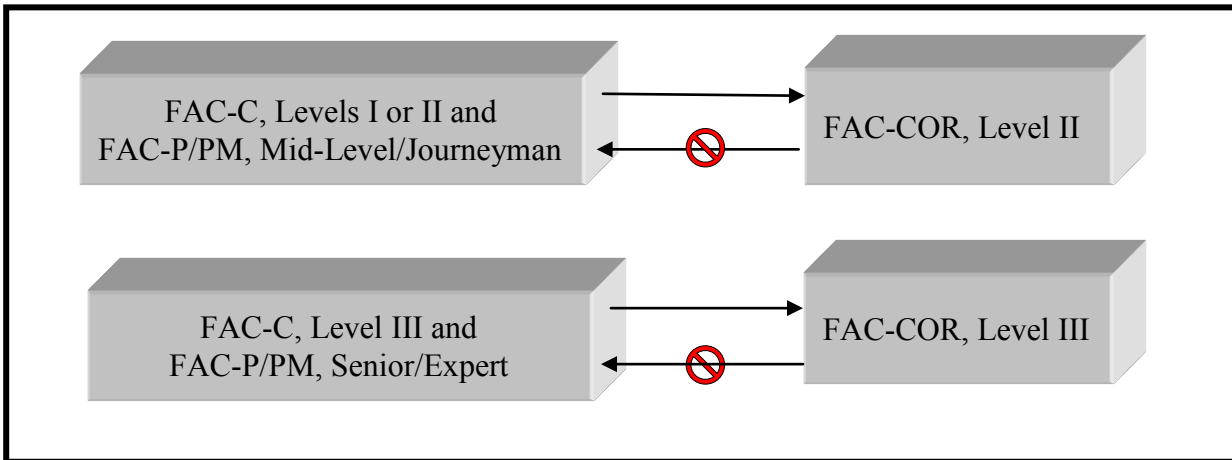
¹⁰ Guidance on continuous learning points is available at www.fai.gov under the Training tab.

example, CORs managing Information Technology (IT) contracts would find a course on IT acquisition helpful. Courses in accounting, program and project management, and contract law are particularly relevant for Level II and Level III CORs. All CORs would benefit from ethics and fraud awareness training. In addition, rotational assignments and attendance at learning seminars and conferences may provide continuous learning points for CORs. It is recommended that CORs discuss their continuous learning plans with their supervisor, the CO, and/or the ACM to ensure maximum benefit.

A FAC-COR will expire if the continuous learning requirements are not met and in this case, the CO may revoke the COR appointment in writing on a case-by-case basis and assign another COR to the contract. A COR who has failed to meet the continuous learning requirements and has had his or her COR appointment revoked must complete the necessary training to be reinstated. The COR, COR’s supervisor, and contractor will be notified in writing in a timely manner of any changes to the COR appointment.

Best Practice: CORs are critical in ensuring successful contract outcomes. As such, CORs must read and understand the contract and work closely with their CO. CORs who are physically located where the contract is being performed can help facilitate effective communication with the contractor.

g. Reciprocity With Other Certifications: As detailed in the chart below, individuals certified as Federal Acquisition Certification in Contracting (FAC-C) Levels I or II or Federal Acquisition Certification for Program and Project Managers (FAC-P/PM) Mid-Level/Journeyman are considered to have met the FAC-COR requirements for Level II. Individuals certified as FAC-C Level III or FAC-P/PM Senior/Expert are considered to have met the FAC-COR requirements for Level III. These individuals must submit their FAC certificates and continuous learning documents¹¹ to their ACMs or designees for FAC-COR certification. However, an individual with FAC-COR certification does not necessarily meet the requirements for FAC-C or FAC-P/PM certification.



¹¹ Or the electronic equivalent of this process, if applicable.

h. COR Performance Management: In order to ensure successful contract management, agencies may consider rating CORs on their performance as part of their annual performance plans.

Best Practices: It is highly encouraged that the COR and his/her supervisor sign the appointment letter acknowledging acceptance of COR responsibilities. It is recommended that COR responsibilities be added as a critical element in their performance plans. The COR's performance management process should allow for CO input into the COR's performance appraisal. It is also a best practice for the COR's supervisor to have a performance standard related to oversight of COR responsibilities.

7. Resources for ACMs and CORs: No later than October 31, 2011, FAI shall develop and maintain a Community of Practice for CORs on its website. This Community of Practice website shall include, at a minimum, best practices, a COR toolkit, a COR handbook, and links to COR areas of interests.

Best Practices: COR mentors are very helpful in acquainting new CORs with specific agency requirements and enhancing the expertise of CORs at all levels. It is also helpful to build the community of CORs within the agency to facilitate collaboration and sharing of best practices.

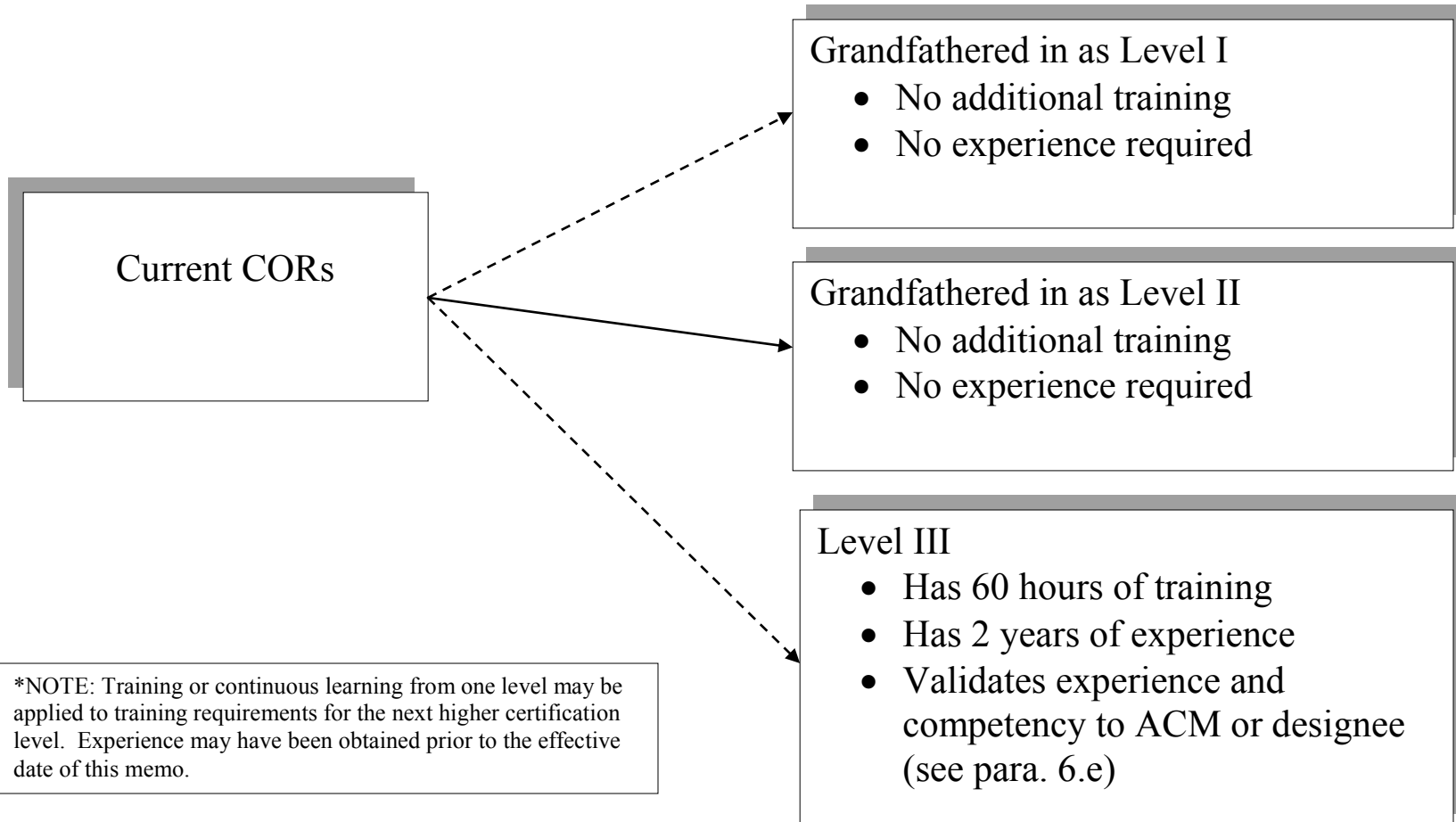
8. Management Information System: Agencies and individuals are responsible for maintaining certification documentation for quality assurance purposes. Agencies are responsible for tracking their COR workforce, including its continuous learning requirements. CORs must ensure their training data is properly entered into the Federal Acquisition Institute Training Application System (FAITAS) or an agency system that feeds into FAITAS. In its fall 2011 release, FAITAS will have career path management functionality which will include a robust reporting tool to process, track and report on certifications and continuous learning requirements. All CORs must be entered into FAITAS no later than February 15, 2012.

Transition of Current CORs

Absent agency action, current CORs shall be grandfathered in as Level II CORs.

At its discretion, and in accordance with agency policy describing the decision process, an agency may decide to:
(1) grandfather some current CORs in as Level I CORs; (2) grandfather some current CORs in as Level II CORs; and/or
(3) reassign some current CORs who meet the new requirements for Level III CORs at Level III after validating their experience and competency to the ACM or designee (see Section 6.e).*

Agencies have until the effective date to determine if and how to reassign their current CORs.



*NOTE: Training or continuous learning from one level may be applied to training requirements for the next higher certification level. Experience may have been obtained prior to the effective date of this memo.

COR Appointment Criteria Matrix

Risk Factor		Little or no risk associated with project	Significant or high risk associated with project
1	Sensitivity or Complexity of What is Being Procured	Oversight confined to basic inspection and acceptance (e.g., COTS or standard supplies)	Highly complex requirements; professional and technical services closely associated with inherently governmental functions; critical function; continuous oversight or technical direction required (e.g., developmental; new or emerging technologies; poor or no performance history)
2	Number and Location of Performance Sites	Non-complex shipping/delivery at a single domestic delivery site	Highly complex shipping/packaging/delivery (e.g., requiring export; staging of shipments; multiple customers with competing requirements; multiple deliverables or sites; foreign performance site(s)) (span of control)
3	Impact of Delay	If project is delayed, no serious impact to mission that cannot be easily alleviated	Serious impact on mission; high degree of impact on follow-on or interdependent projects; time is critical due to urgency, weather, or long-lead time items in critical path (e.g., contingency contract)
4	Visibility	Little or no internal or external interest anticipated	High degree of internal or external interest anticipated (e.g., GAO oversight; congressional engagement; other special interests)
5	Contract Type/Structure	Firm fixed price contracts with basic provisions	Contracts other than firm fixed price (e.g., letter contract; cost-type contract; contract financing provisions required; hybrid contract; incentives; time and materials contract)
6	Special Considerations	No rights in data or government property required; No Personally Identifiable Information (PII) or security concerns	High level of oversight required to assure government/contractor rights in data or government property; Significant security concerns relating to contract classification or PII data