



Review of Contracts and Grants Workforce Staffing and Qualifications in Agencies Overseeing Recovery Act Funds

*Compiled and presented by the
Office of Inspector General,
Department of Commerce*



March 2010



From the Inspector General

On behalf of the Recovery Accountability and Transparency Board, the Department of Commerce Office of Inspector General is pleased to present the findings of the Board's review of contracts and grants workforce staffing and qualifications. The goal of the survey was to review, as directed by the American Recovery and Reinvestment Act of 2009 (ARRA), whether those offices awarding and administering ARRA-funded contracts and grants have the proper staffing, qualifications, and training.

A survey document was distributed to the 29 offices of Inspector General responsible for oversight of the Recovery Act. It was completed in coordination with agencies' senior accountable officials for ARRA and acquisitions and grants officials. We received over 500 responses from 26 agencies, completed by one or more contracts and grants offices within those agencies.

This report summarizes the responses to the survey and provides an overview of the staffing, qualifications, and training of the acquisitions and grants workforce awarding and administering ARRA funds. This is our final report to the Board.

We appreciate this opportunity to serve the Board as it works to ensure transparency in the use of ARRA funding.

Sincerely,

A handwritten signature in black ink that reads "Todd J. Zinser". The signature is written in a cursive, flowing style.

Todd J. Zinser, Inspector General
Department of Commerce

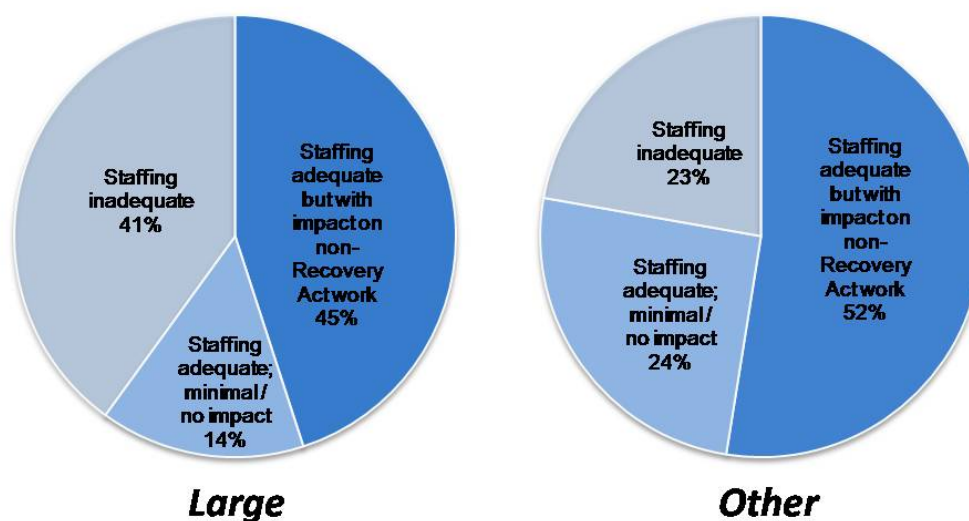
RESULTS IN BRIEF

Staffing Sufficiency of Contracts and Grants Workforce

Additional Workload from the Recovery Act Has Put a Strain on a Significant Portion of the Contract and Grants Workforce

Twenty-nine federal agencies receiving Recovery Act funds were surveyed as to the adequacy of contracting and grants Recovery Act staffing. Responses indicated whether staffing was viewed as **adequate**, **adequate but with impact on non-Recovery Act work**, or **inadequate** to award and administer Recovery Act funds. We divided our analysis into two groups: those from *Large* agencies (Department of Defense, Health and Human Services, and Department of the Interior, the three largest agencies based on the level of effort expended by its staff on the Recovery Act), and those from all *Other* responding agencies.

Figure 1. Contracts and Grants Recovery Act Staffing Generally Viewed as Inadequate, Adequate, or Adequate But with Impact on Non-Recovery Act Work



Note: Percentages do not always add to 100 due to rounding or the exclusion of minimal nonresponse rates. The two figures above represent the total responses from the contracts and grants workforces.

As shown in Figure 1, the Large agency respondents reported that their staffing was inadequate at a much higher rate than respondents from the Other agencies. The overall staffing sufficiency of the acquisition and grants workforces at the Large agencies was

approximately 60 percent, while the Other agencies reported a 77-percent staffing adequacy.

Reported impacts on both Recovery Act and non-Recovery Act work included (1) award delays, (2) decreased post-award monitoring, (3) increased staff hours, and (4) use of supplemental staff.

To ensure timely completion of Recovery Act work, agencies are prioritizing their Recovery Act workload, hiring additional personnel, and shifting and/or reassigning staff. Likewise, to meet the increased workload, agencies are devoting more full-time equivalents (FTE) to Recovery Act contracts and grants. Such personnel are projected to increase by over 125 percent from the summer of 2009 to the summer of 2010, growing from approximately 1,800 to more than 4,100.

Qualifications of Contracts and Grants Workforce

Compliance with Requirements Varies by Position for Contracting Workforce

Federal requirements exist in civilian agencies for the certification and training of contracting officers, contracting officer's (technical) representatives (COTRs/CORs), and contract program managers (but not for contracting support personnel). The Department of Defense has established certification programs for its contracting officers and contract program managers.¹

Almost all (approximately 97 percent) of the contracting officers assigned to Recovery Act acquisitions at civilian agencies are certified; however, about 75 percent of COTRs/CORs are certified. Employees in these positions perform critical technical and acquisition functions, and their lack of certification is an area that agencies need to assess and, if necessary, take appropriate action to correct.

For contract program managers at civilian agencies, certification requirements apply only to those working on major acquisitions²—about one-third of this group of employees. Approximately one-third of all civilian contract program managers are certified. However, given the diversity of program offices at the various agencies, agencies should determine whether those program managers working on major acquisitions under the Recovery Act are certified, and take corrective action as necessary.

¹ The requirements are established by the Defense Acquisition Workforce Improvement Act of 1990 (10 U.S.C. § 1701-1764, Pub. L. 101-510, Div. A, Title XII, November 5, 1990, 104 STAT. 1638) and the Office of Federal Procurement Policy (OFPP) (for civilian agencies).

² A major acquisition is defined as a system requiring special management attention because of its importance to the mission, function of the agency, obligation of more than \$500,000 annually, high executive visibility, or other similar elements.

The Department of Defense also expects nearly all (94 percent) of its contracting officers assigned to Recovery Act contracts to be certified; however, it has no Department-wide certification program for its COTRs/CORs, 800 of whom are assigned to manage Recovery Act contracts.³

No Government-wide Qualifications Requirements Exist for Grants Workforce

The grants workforce has no government-wide qualification or training requirements, although some agency-specific requirements exist. Most employees work for agencies that do not have structured competency-based requirements for developing their grants workforce. Only about 8 percent of the grants officers, 50 percent of grants program managers, and 29 percent of grants specialists work in agencies that will have implemented agency-specific training and continuous learning requirements by June 2010.

The Recovery Act will ultimately award approximately \$275 billion in contract, grant, and loan funds,⁴ and this is but a fraction of the total contract and award funds that the federal government oversees. Without a common certification and continuous learning program—which does exist for the acquisition workforce—it is difficult to determine whether the qualification requirements and training of the grants workforce are adequate. Establishing standard qualifications and training requirements similar to those of the acquisition workforce to ensure well-trained grants personnel is a best practice that would strengthen quality controls and reduce risk in the award and administration of grants government-wide.

RECOMMENDATIONS

Based on our survey results, we have formulated several specific recommendations. We recommend that agencies continue to closely monitor their staffing of both Recovery Act and non-ARRA work, and make adjustments as necessary to ensure that all contracts and grants are properly awarded and monitored.

We also recommend that agencies assess training and certification issues for their contracting personnel. In particular, agencies should:

³ Defense components have various individual COTR/COR certification requirements. A Defense working group has prepared a draft Defense-wide instruction to set minimum qualifications requirements, which include training, experience, and general competencies.

⁴ See <http://www.recovery.gov/Pages/home.aspx>.

- Ensure that contracting officers meet continuous learning requirements to maintain their certifications,
- Identify COTRs/CORs working on Recovery Act contracts who lack certification and/or continuous learning requirements, and take corrective action, and
- Determine whether program managers working on major acquisitions under the Recovery Act are certified, and take appropriate steps to certify those who are not.

Further, absent government-wide standards for grants management personnel, agencies have established their own requirements. We see this as a best practice.

INTRODUCTION

The American Recovery and Reinvestment Act of 2009 (ARRA) directs the Recovery Accountability and Transparency Board to review (1) “whether there are sufficient qualified acquisition and grant personnel overseeing covered funds” and (2) “whether personnel whose duties involve acquisitions or grants made with covered funds receive adequate training.”⁵

At the request of, and in consultation with, the Board, the Department of Commerce Office of Inspector General (OIG) developed this survey. It divides the pertinent federal workforce into two components, one for contracts and the other for grants. The survey also attempts to capture projected workforce staffing and qualifications data through June 2010 as Recovery Act funds continue to be disbursed.

The survey was divided into seven discrete sections, each focusing on a specific segment of the contracts and grants workforce.⁶ See Appendix B, *Objectives, Scope, and Methodology*, for our specific definitions of certain terms as used in this report, and for the Office of Federal Procurement Policy’s (OFPP) definitions⁷ of the following four acquisition workforce positions:

CONTRACTS

- ***Contracting Officer (CO)***
- ***Contracting Officer’s Technical Representative/Contracting Officer’s Representative (COTR/COR)***
- ***Contract Program Manager/Contract Project Manager (CPM)***
- ***Contracting Support Personnel (CSP)***

⁵ Pub. L. 111-5, § 1523(a)(2)(D) & (E), 123 STAT. 290.

⁶ This review is distinct from recent projects undertaken by the Office of Personnel Management (OPM) and OFPP. OPM issued a survey in June 2009 “to better understand grants management work in the Federal Government,” and OFPP—working with the Department of Defense and the Federal Acquisition Institute—last year completed and published, on October 27, 2009 (as mandated by the Duncan Hunter National Defense Authorization Act for Fiscal Year 2009 [Pub. L. No. 110-417]), the *Acquisition Workforce Development Strategic Plan for Civilian Agencies for FY2010-2014*, which can be found at http://www.whitehouse.gov/omb/assets/procurement_workforce/AWF_Plan_10272009.pdf. Additionally, the Federal Acquisition Institute issues an annual demographic report on the federal acquisition workforce, which is separate from this review (e.g., *FY2008 Annual Report on the Federal Acquisition Workforce*, available at <http://www.fai.gov/sturep.asp>).

⁷ *Developing and Managing the Acquisition Workforce*, OFPP Policy Letter 05-01, April 15, 2005.

These four contracting positions reflect OFPP's guidelines for the acquisition workforce; it has established three distinct certification and continuous learning programs for contracting officers, contracting officers' (technical) representatives, and contract program (project) managers. Specific General Schedule (federal) job series exist for contracting officers and grants management specialists.

GRANTS

Unlike the contracts workforce, there is no standardized structure for the grants workforce. As a result, the grants workforce is structured differently from agency to agency across the federal government. This survey attempts to provide comprehensive definitions in order to capture the authorizing management, policy, oversight, and support personnel who award and administer grants. See Appendix B, *Objectives, Scope, and Methodology*, for definitions of the grants workforce.

- ***Grants Officer (GO)***
- ***Grants Program Manager/Grants Project Manager (GPM)***
- ***Grants Specialist/Grants Support Personnel (GS)***

METHODOLOGY

The survey was transmitted to the 29 agency OIGs responsible for oversight of the Recovery Act. The survey was designed to be a set of self-administered questionnaires that captured information on the sufficiency of acquisition and grants personnel overseeing Recovery Act funds, and whether these personnel had received adequate training. The survey's questions were to be answered at the contracting or grant-making activity level of each agency. Since there was limited opportunity for the OIG offices to validate those data, we structured the survey to assist the respondents in reporting valid and consistent information over three separate time frames. However, answers to the survey depended on the respondent's honesty and ability to respond.

To facilitate completion of the survey, Board Chairman Earl Devaney requested that the senior accountable Recovery Act official at each agency provide whatever assistance was requested by OIG.

Twenty-six agencies responded; these 26 agencies include 140 responding entities, which, for the purposes of this review, are called "subagencies." This term captures a wide range of entities that reside within departments or other organizations that were the survey's primary points of contact. Each subagency provided one *or more* responses to the survey

based on how their organization uses staff to award and administer contracts and grants. Therefore, although 140 entities are represented, the actual total of individual responses was substantially higher—542 (317 responses to the contracts survey and 225 responses to the grants survey).

More specifically, agencies packaged survey responses in various ways. Some sent one consolidated survey, while others sent separate responses by subagency. For example, the Department of State sent one survey response, while the Department of Transportation sent five, one each from the Federal Aviation Administration, Federal Highway Administration, Federal Railroad Administration, Federal Transit Administration, and the Maritime Administration. Further, not every subagency responded to all seven sections of the survey, presumably answering only relevant sections. Errors or distortions due to non-response may exist.

The results of the completed surveys were used to create this consolidated report, which was distributed in draft form to OIGs. Comments to the draft were received from 11 of the 26 agencies, along with the Recovery Accountability and Transparency Board staff and OFPP; changes have been made to the report, as appropriate, based on these comments. A more complete discussion can be found in Appendix B.

OBSERVATIONS

Recovery Act funding has substantially increased the workload of most agencies receiving these funds, as agencies were expected to make additional awards as quickly as possible while adhering to regulations and procedures that would ensure a fair and competitive process. Federal agencies receiving Recovery Act funds are also subject to the reporting requirements outlined in Office of Management and Budget (OMB) guidance to track and monitor all Recovery Act dollars in a manner that provides transparency and accountability for taxpayers.

Agencies have devoted substantial resources to awarding Recovery Act contracts and grants, and will assign additional staff to this effort during FY 2010. The responses to this survey indicate, however, that the additional workload has put a strain on a significant portion of the contracts and grants workforce charged with making Recovery Act awards. Although agencies are prioritizing Recovery Act work and, in many instances, are hiring additional staff or realigning work to provide assistance, the added workload has exacted a price. The awarding of contracts and grants is being delayed—as is other work; employees are working overtime; and the oversight and monitoring of awards—especially non-Recovery Act contracts and grants—are expected to decline, as many agencies attempt to implement Recovery Act requirements while carrying out their ongoing programs and operations.

As to qualifications, agencies are generally assigning a qualified acquisitions and grants workforce to the Recovery Act, but some concern exists that training may be delayed over the coming year as agencies continue to address their increased workloads. The compliance of the contracting workforce with the certification and training requirements established by the Office of Federal Procurement Policy (OFPP) varies considerably, although nearly all contracting officers—those charged with making Recovery Act awards—are certified. And, while no equivalent government-wide standard exists for certification or training within the grants community, about one-third of the subagencies responding to the grants survey have established agency-specific requirements for their grants workforce.

The Recovery Act Workforce

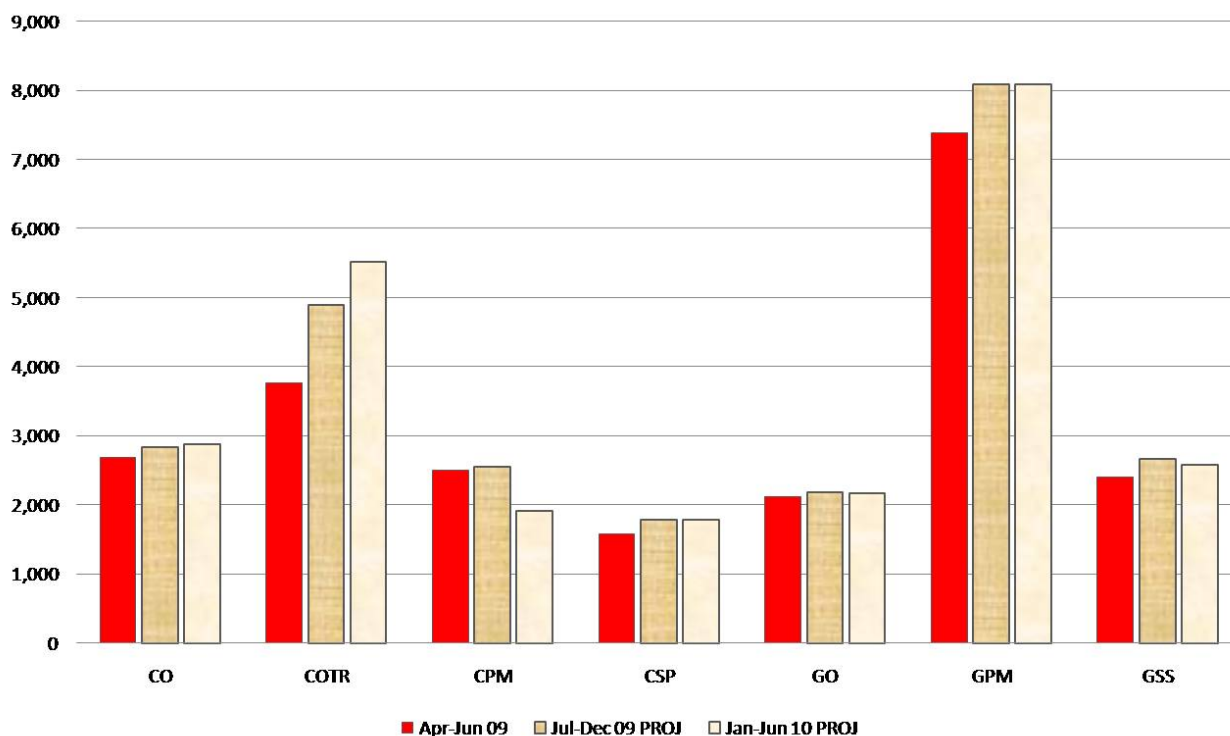
As the results of the survey indicate, agencies government-wide have been staffing up to meet the demands of the Recovery Act. Agencies receiving Recovery Act funding reported that from April through June⁸ 2009, they assigned more than 22,000 professional staff to their Recovery Act contracts and grants work (out of a total of nearly 99,000 such personnel). Staffing levels in the acquisitions and grants workforce are expected to

⁸ Throughout this report, April through June means April 1 through June 30. Likewise, January through June means January 1 through June 30, and July through December means July 1 through December 31.

increase to just under 25,000, and remain at that level through June 2010. A breakdown of staffing levels among the contracts and grants positions follows:

[Note: Tables containing underlying and additional data for the following figures can be found in Appendixes D and E.]

Figure 2. Employees, by Position, Assigned to Recovery Act Contracts and Grants, Actual and Projected, April 2009–June 2010^a



CO—Contracting Officer; COTR—Contracting Officer’s Technical Representative; CPM—Contract Program Manager; CSP—Contracting Support Personnel; GO—Grants Officer; GPM—Grants Program Manager; GS—Grants Specialist

^a For Figures 2–4, the numbers of grants program managers (GPM) are significantly greater than for the other positions. Three subagencies (Interior’s Office of Indian Affairs, HHS’ Office of Community Services, and DOT’s Federal Highway Administration) account for over half of these positions.

Level of Effort on Recovery Act Contracts and Grants: *Large and Other Agencies*

The more than 22,000 contracts and grants professionals initially assigned to agencies’ Recovery Act workload devoted more than 3.7 million hours to this effort from April through June 2009. This equates to approximately 30 percent of the employees’ full-time schedules, or over 1,800 annual FTEs expended during the 3-month period.

Agencies projected that the time worked on Recovery Act contracts and grants for the 12-month period from July 2009 through June 2010 would exceed 17.5 million hours. This level of effort represents nearly 8,600 FTEs.

In order to provide additional perspective to the cumulative data reported by respondents for the acquisition and grants workforces, especially with respect to the level of effort their personnel are devoting to implementing the Recovery Act, agencies were categorized as *Large* and *Other*. Agencies reported the number of personnel assigned or expected to be assigned to the award and administration of Recovery Act contracts and grants and the percentage of time those employees would spend on Recovery Act-related duties. From these data, the number of hours and full-time-equivalent positions were determined for each agency, and agencies were categorized as *Large* or *Other* based on a statistical analysis of the information each provided. When responses for the combined Recovery Act contracts and grants workforce are totaled, three agencies are considered to be *Large*: the Department of Defense, the Department of the Interior, and the Department of Health and Human Services (HHS). For this analysis of the combined workforces, the remaining 23 agencies are aggregated as *Other*.

Large Agencies

The three large agencies administering Recovery Act contracts and grants within the combined acquisition and grants workforce, Defense, HHS, and Interior, assigned about 1,100 full-time-equivalent acquisition and grants professionals to their agencies' Recovery Act workload from April through June 2009. At the time the survey was administered, the Large agencies projected a total of just over 4,800 FTEs devoted to Recovery Act work for the 12 months ending June 2010.

Other Agencies

In the remaining group of responding agencies, about 700 FTEs were assigned to Recovery Act work from April through June 2009. These agencies projected slightly fewer than 3,800 FTEs devoted to Recovery Act work for the 12 months ending June 2010.

Figure 3. Full-Time-Equivalent (FTE) Employees Assigned to Large Agency Recovery Act Contracts and Grants, Actual and Projected, April 2009–June 2010

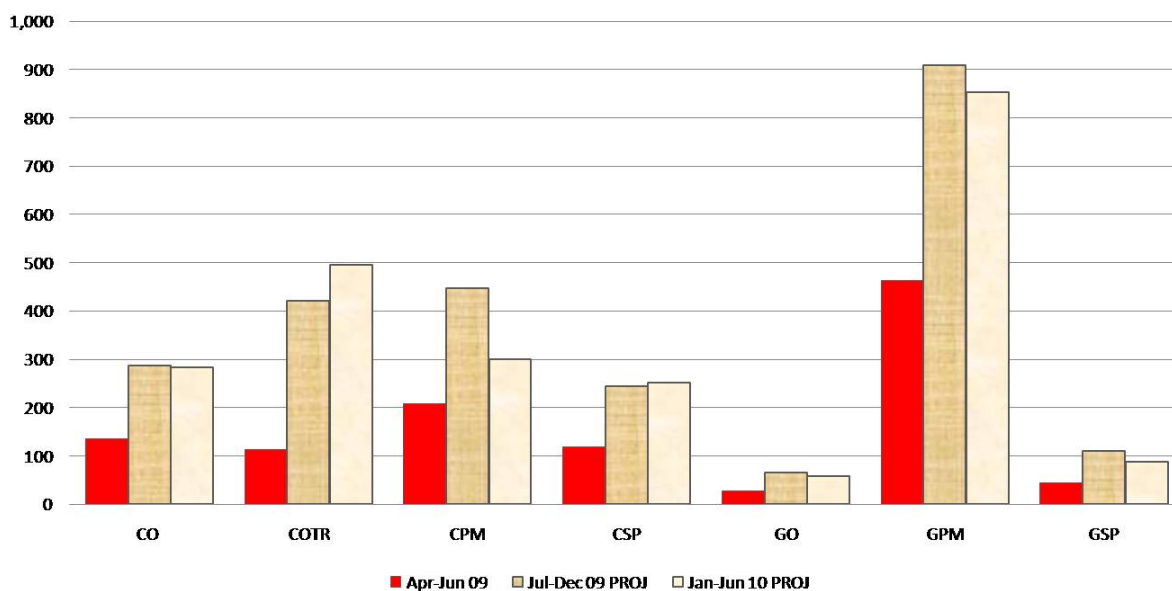
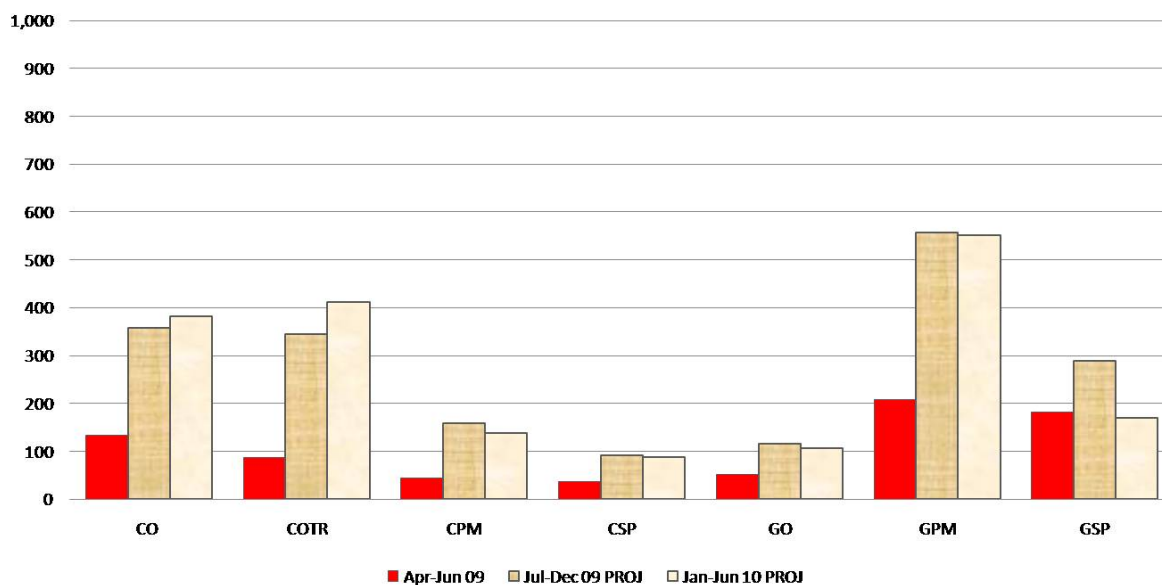


Figure 4. Full-Time-Equivalent (FTE) Employees Assigned to Other Agency Recovery Act Contracts and Grants, Actual and Projected, April 2009–June 2010



CO—Contracting Officer; COTR—Contracting Officer’s Technical Representative; CPM—Contract Program Manager; CSP—Contracting Support Personnel

Sufficiency of Federal Contracts and Grants Workforce

Most contracts respondents said that the numbers of personnel on hand were sufficient to accomplish their Recovery Act work, but the sufficiency of staffing was viewed less consistently in the grants community. A respondent's view of staffing sufficiency does not, however, provide a complete view of the Recovery Act's impact on federal acquisition and grants operations. Many respondents in both the contracts and grants career fields who reported having sufficient staff for their Recovery Act work did indicate, however, that they are experiencing a number of impacts on their non-Recovery Act workload.

Further, where numbers of acquisition or grants personnel were judged to be insufficient, the major expected impact was not on Recovery Act work—which is receiving high priority—but on non-Recovery Act work. Regardless of their views on the sufficiency of personnel, though, respondents in both the acquisitions and grants workforces reported prioritizing their Recovery Act workload, and shifting and/or reassigning staff to ensure completion of Recovery Act work in a timely manner.

CONTRACTS

Sufficiency of Staff to Award and Administer Recovery Act Contracts

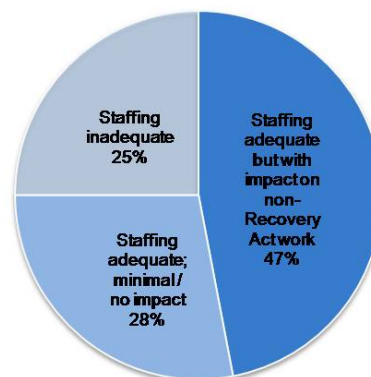
Overall, the acquisition workforce reported that they have sufficient staff to accomplish their Recovery Act work.

As seen in Figure 5, 28 percent of all contracts respondents stated that the additional Recovery Act work was having little or no impact on their contracting operations, while 47 percent reported that they have sufficient staff to accomplish their Recovery Act acquisitions but are experiencing impacts to their non-Recovery Act work. The remaining 25 percent of contracts respondents indicated that their staffing is not sufficient for their Recovery Act workload.

Agencies were subsequently divided into subgroups in order to establish whether their views of the sufficiency of their staffing varied according to their assessments of the level of effort required to address their Recovery Act workload.

A total of 317 responses were received from the acquisition workforce, representing contracting officers, COTRs/CORs, contract program managers, and contracting support personnel at agencies overseeing Recovery Act contracts. Of these respondents, 33 are from Defense and Interior, the agencies that reported

**Figure 5: Contracts—
Sufficiency of ARRA Staffing**



devoting significantly greater level of effort to Recovery Act acquisitions.⁹ The remaining 284 respondents constitute Other agencies, who reported fewer FTEs needed to complete their Recovery Act work.

There is a noticeable difference in the assessment of the sufficiency of their workforces between the respondents from Large and Other agencies (see Figures 6 and 7). Fifty-four percent of the Large agency respondents reported that they have adequate staff for their Recovery Act work with either little or no impact, or with impact only on their non-ARRA workload. Nearly 46 percent of respondents from Large agencies stated that their staffing was inadequate for the Recovery Act workload.

Slightly more than three-quarters of the 284 respondents from the Other agencies stated that they have sufficient staff to award and administer Recovery Act contracts with little or no impact, or with impact only to their non-Recovery Act work. Of the 29 percent of these respondents who expect little or no impact

on their non-Recovery Act acquisition workload, some reported the Recovery Act workload to be minimal, while others indicated that Recovery Act funding was being applied to ongoing contracts or programs and did not significantly increase the respondent's work. Twenty-two percent of respondents from Other agencies reported that they are not adequately staffed for their ARRA work.

No one segment of the acquisition workforce reported being significantly more understaffed than any other. In both Large and Other agencies, staffing for Recovery Act work was considered to be sufficient or inadequate across the four acquisition career fields in roughly the same proportion as was reported overall.

Figure 6: Contracts—Sufficiency of ARRA Staffing (Large Agencies)

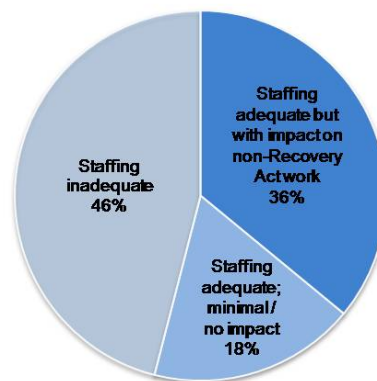
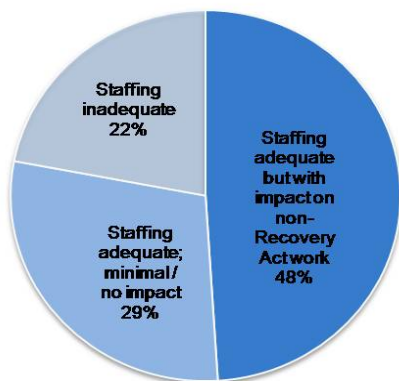


Figure 7: Contracts—Sufficiency of ARRA Staffing (Other Agencies)



⁹ The same statistical analysis that was conducted on the combined contracts and grants data was also applied separately to each set of data. The results differed for the contracting agencies. For the combined contracts and grants analysis, three agencies awarding ARRA funds were determined to be Large (Defense, HHS, and Interior). Only two of these, Defense and Interior, are categorized as Large when just the contracting data are analyzed, with the remaining 24 agencies being categorized as Other. Two agencies, HHS and Interior, are categorized as Large for the analysis of grants data. Defense did not report any Recovery Act grants.

Impact on Agencies Awarding and Administering Recovery Act Contracts

Respondents in each of the acquisition career fields were asked to report on the impacts, if any, that they are experiencing or expect to experience as a result of the additional Recovery Act workload. Regardless of whether these respondents stated that they have or do not have sufficient staff to accomplish their Recovery Act work, the impacts they reported were noticeably similar.

Across the acquisition workforce, delays to non-ARRA work, including awarding and administering non-ARRA contracts, was the most frequently predicted effect resulting from the added Recovery Act workload. Respondents indicated that acquisition delays will range from longer lead times in initiating awards and not completing projects on time, to rescheduling projects or even postponing them indefinitely. Additionally, several respondents reported that timely obligation of all fiscal year funds, policy development, and other programmatic initiatives, along with training, might not be completed over the next year. Although many respondents reported that work and personnel were being realigned to prioritize Recovery Act acquisitions and reporting, the non-Recovery Act work—including policy initiatives, reporting, and oversight, in addition to contracting—is expected to experience diminished quality and timeliness.

The respondents who indicated they did not have sufficient personnel to address the additional Recovery Act workload also reported that they expect to experience delays to ARRA acquisitions. Among this subset of respondents within the acquisition workforce, this impact was noted by most respondents in the Large agencies, but by fewer than half of those in the Other agencies. These respondents also expressed concern about their ability to adequately administer and monitor their ARRA acquisitions once the awards are made.

CONTRACTS

Most frequent impacts noted:

- Delays in non-ARRA work
- Necessity of supplemental staff
- Increased staff hours and overtime
- Decreased post-award monitoring of non-ARRA awards

Respondents in the acquisition workforce, especially those in Other agencies, reported that they are supplementing their staffs in a variety of ways in order to address the Recovery Act work in addition to their ongoing responsibilities. Contracts respondents report that they are taking one or more steps to augment their staff, ranging from hiring additional temporary, term,¹⁰ or permanent employees (including reemployed annuitants), procuring contract support staff from government contractors, cross-training additional employees to become COTRs or contract program managers, to redirecting resources from other programs and adjusting workloads within their offices or agencies.

¹⁰ Under term employment, the employing agency hires the term appointee for a limited period of time, lasting for more than 1 year but not exceeding 4 years.

Decreased attention to the administration and monitoring of non-ARRA contracts is another significant impact that many respondents reported they expect to see as they focus on meeting Recovery Act milestones and deadlines. As several explained, without additional resources, their staffs will not be able to devote the same attention to processing modifications, updating contract management plans, monitoring contractor systems, or tracking deliverables for their non-Recovery Act contracts. One respondent characterized this qualitative decrease in the oversight of non-ARRA awards as “reactionary” contract administration.

Finally, acquisition personnel are working longer hours, including overtime, credit hours, and compensatory time, to meet the requirements of the Recovery Act. Respondents expressed concern not only about the increased costs of these premium hours, in dollars and/or compensatory time off for critical personnel, but also of the toll that prolonged extended hours can have on employees, citing burnout and decreased morale and productivity.

GRANTS

Sufficiency of Staff to Award and Administer Recovery Act Grants

Most grants respondents said that the numbers of personnel on hand were sufficient to accomplish their Recovery Act work. As shown in Figure 8, 71 percent of all 225 respondents indicated that the staffing for the Recovery Act was sufficient with minimal or no impact on Recovery Act awards, or with impact on other non-Recovery Act work. However, the remaining 28 percent said that their staffing was inadequate, similar to the results of the

analysis of staffing sufficiency performed for contracts.¹¹

We further analyzed the respondents by grouping them into two categories: respondents from *Large* agencies and respondents from *Other* agencies.

Figure 8: Grants—Sufficiency of ARRA Staffing

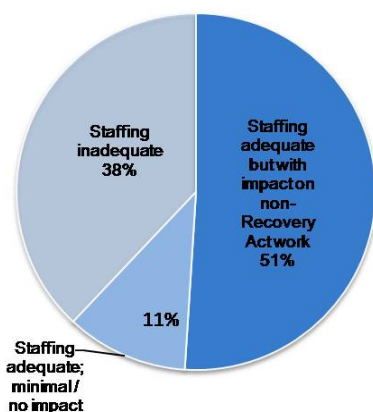
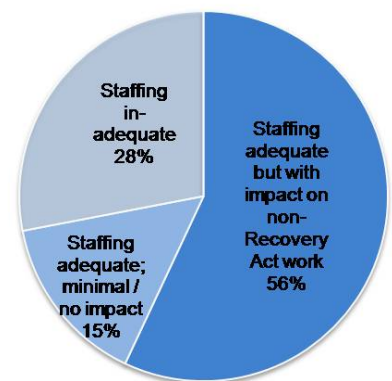


Figure 9: Grants—Sufficiency of ARRA Staffing (Large Agencies)

¹¹ Percentages do not always add to 100 due to rounding or the exclusion of minimal nonresponse rates.

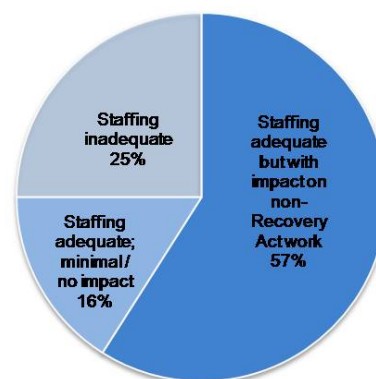
The 225 responses described the sufficiency of the Recovery Act workforce for the three categories of personnel responsible for the award and administration of grants: the grants officer, the grants program manager, and the grants specialist. Of these respondents, 47 belong to HHS and Interior—the two agencies considered Large—and 178 belong to the remaining, Other agencies.

Figures 9 and 10 highlight the difference in the staffing sufficiency percentages when the responses are tabulated by Large and Other agency respondents. Sixty-two percent of the Large agency respondents called staffing adequate, with minimal or no impact on Recovery Act work or with impact on non-Recovery Act work. About 38 percent indicated their staffing to be inadequate.

For Large agencies, over 80 percent of those responding reported having enough grants officers to address their Recovery Act financial assistance workload. However, over one-third said that they did not have sufficient grants program managers, while almost two-thirds said that they did not have sufficient staffing of grants specialists.

For the Other agencies, almost 75 percent felt that staffing was adequate, with minimal or no impact on Recovery Act work or impact that primarily affected non-Recovery Act work. Approximately 25 percent indicated that their staffing was inadequate. However, in this Other agency category, the personnel grouping in the greatest need of staff is the grants program manager. Over one-third of the respondents said that they did not have sufficient grants program managers, with one-fifth reporting that they needed additional grants officers and grant specialists.

Figure 10: Grants—Sufficiency of ARRA Staffing (Other Agencies)



Impacts on Agencies Awarding and Administering Recovery Act Grants

As with contracting, grants respondents expected a significant impact on non-Recovery Act work. Respondents consistently stated that the Recovery Act work is a priority resulting in non-Recovery Act awards being delayed, rescheduled, or postponed indefinitely. Additionally, many respondents who are focused on Recovery Act activities do not have sufficient time to spend on the oversight of non-ARRA awards, without additional staff or the payment of overtime.

GRANTS

Most frequent impacts noted:

- Delays in non-ARRA work
- Necessity of supplemental staff
- Decreased post-award monitoring of non-ARRA awards
- Increased staff hours and overtime

The impacts noted were very much the same, whether the respondents said that they did not have sufficient staff to award and administer Recovery Act grants, or that they

did but provided the impacts that Recovery Act workload is having on the agency. Both groups indicated that the additional workload is being accommodated, in part, by streamlining work processes and realigning priorities.

The Recovery Act has resulted in non-Recovery Act work being delayed. Agency officials said that the non-Recovery Act awards are being postponed and in some instances the funding and workload are being carried over to subsequent fiscal years. Further, these delays include the performance of routine grants management tasks such as the review of applications in discretionary grants competitions, resolution of audit findings, and delays in the closeout of non-ARRA awards.

The priority being placed on the Recovery Act work also affects the grants staffs' ability to spend adequate time on the post-award monitoring of non-ARRA projects. Respondents reported that they face the likelihood of not being able to provide adequate monitoring and oversight of non-Recovery Act awards. Specifically, respondents said that they will have less time to respond to recipient inquiries and review reports, along with the likelihood that the quality of the data reviews performed would be reduced.

In order to meet the requirements of the Recovery Act, respondents noted that their grants staff is working overtime and earning compensatory time to absorb the additional workload. In addition, agencies are delaying annual leave and training for employees. However, several respondents questioned whether these compensatory actions exacerbate the workload problems in the near future and affect the administration of Recovery Act awards as well. As grants staff begin to use their leave and take needed training, fewer personnel will be available to manage both non-Recovery Act and Recovery Act awards.

Finally, many agencies are hiring or trying to hire additional qualified staff, including interns, temporary employees, and, to a lesser degree, contractors. In addition, agencies reported that they were trying to mitigate some of the negative impacts caused by the additional Recovery Act responsibilities by workload sharing across offices and redirecting resources to help with the additional post-award monitoring.

Qualifications and Training of Contracts and Grants Workforce

Professional development within the acquisition workforce differs from that in the grants workforce, with more structured requirements for contracts personnel.¹²

CONTRACTS

Certification and Training

Developing, managing and overseeing successful acquisitions is a cooperative endeavor requiring a well-qualified and trained workforce, including contracting officers, COTRs/CORs, contract program managers, and contracting support personnel. Toward this end, qualification standards have been developed to professionalize the acquisition career fields in both the Department of Defense and civilian agencies. Pursuant to the Defense Acquisition Workforce Improvement Act of 1990, as amended (DAWIA), Defense created separate certification programs for contracting officers and contract program managers. Modeled after DAWIA's education, training, and experience requirements, OFPP established three certification programs for the civilian agencies—one each for contracting officers, contract program managers, and COTRs/CORs.¹³ OFPP cedes administration to individual agencies, including authority to supplement or waive requirements. Due to the distinct certification requirements for acquisition professionals at Defense and civilian agencies, the following discussion segregates the contracting workforce accordingly.

The OFPP certification programs, instituted in 2006 and 2007 for civilian agencies, differ by career field as to required education, training levels, experience, and continuous learning. Table 1, following, details these requirements:

¹² The reported data on certification and training focuses on the number of employees who are subject to competency-based requirements. Consequently, agencies were not categorized by Large and Other.

¹³ In 2005, OFPP tasked the Federal Acquisition Institute and Chief Acquisition Officers Council with creating a certification program for contracting professionals in civilian agencies; these programs are the result of those efforts.

Table 1. Acquisition Personnel Certification Requirements^a (Civilian)

	Education	Training	Experience	Continuous Learning (2-year cycles)
CO	24 semester hours of business-related education or a baccalaureate degree (for levels I&II); <i>both</i> (for level III)	<i>Level I</i> : 5 defined business courses and 1 elective	<i>Level I</i> : 1 year	80 hours of continuous learning
		<i>Level II</i> : Level I plus 3 defined 200-level courses and 2 electives	<i>Level II</i> : 2 years	
		<i>Level III</i> : Level II plus <i>Advanced Business Solutions for Mission Support</i> and 2 electives	<i>Level III</i> : 4 years	
COTR/COR	No specific requirements	40 hours minimum	None	40 hours of continuous learning
CPM	No specific requirements	<i>Entry Level</i> : 112 hours	<i>Entry Level</i> : 1 year	80 hours of continuous learning
		<i>Mid-Level/Journeyman</i> : 88 hours	<i>Mid-Level/Journeyman</i> : 2 years	
		<i>Expert Level</i> : 112 hours	<i>Senior/Expert</i> : 4 years	

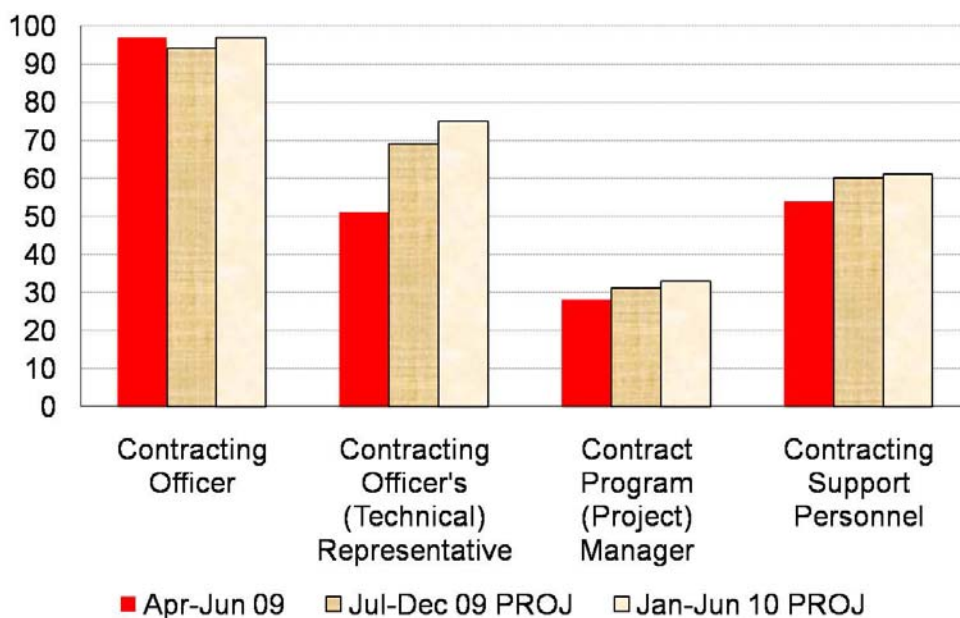
^aAn agency procurement executive may waive certification requirements on a case-by-case basis if he or she determines that doing so is in the best interest of the agency.

Sources: *Developing and Managing the Acquisition Workforce*, OFPP Policy Letter 05-01 (April 15, 2005); OFPP Federal Acquisition Certification in Contracting Program (January 20, 2006); OFPP Federal Acquisition Certification for Contracting Officer’s Technical Representatives (November 26, 2007); OFPP Federal Acquisition Certification for Program and Project Managers (April 25, 2007).

CO—Contracting Officer; COTR—Contracting Officer’s Technical Representative; CPM—Contract Program Manager

Program managers assigned to a major acquisition for the first time have 12 months to complete all requirements for certification, while COTRs/CORs are given 6 months from their first assignment to a contract to become certified. Among the three acquisition career fields that require certification in civilian agencies, the certification rates vary. While a very high percentage of contracting officers are certified, the certification rates are significantly lower for COTRs/CORs and contract program managers, even though they perform critical technical and acquisition functions. (See Figure 11.) Contract program managers only require certification if they are assigned to major acquisitions.

Figure 11. Certification of Employees Assigned to Recovery Act Contracts in Civilian Agencies, by Career Field, Actual and Projected, April 2009–June 2010 (%)



Note: Contracting support personnel are not required by OFPP to be certified.

- **Contracting Officers**

Defense and civilian subagencies reported that they have overwhelmingly assigned certified contracting officers to Recovery Act acquisitions. Civilian agencies reported that they will assign over 2,300 contracting officers to Recovery Act contracts for the period January through June 2010. The certification rate for these contracting officers was expected to be 97 percent. Defense, with nearly 600 contracting officers to be assigned to the Recovery Act through the same period, reported a certification rate of 94 percent for these professionals.

The percentage of contracting officers at Defense and civilian agencies current on their 2-year continuous learning requirements is not as high. Eighty-five percent of Defense contracting officers assigned to Recovery Act contracts are in full compliance with continuous learning requirements, while 62 percent of contracting officers at civilian agencies are current. Although the high certification rate is positive, the continuous learning necessary for contracting officers to retain these certifications is likewise important. Agencies must therefore ensure that these personnel stay current with their required hours of continuous learning.

- ***Contracting Officer's Technical Representatives/Contracting Officer's Representatives***

Civilian subagencies reported that just over 4700 COTRs/CORs would be assigned to Recovery Act contracts for the period ending June 2010. Of these, 75 percent were to be certified as of this date. The lower certification rate, compared with that of contracting officers, is explained in part by one subagency with a substantial number of the personnel in this category—30 percent of the total—reporting that it had not yet implemented the COTR/COR certification program at the time of the survey; however, it stated that its COTRs had completed appropriate training. As previously noted, Defense has not established certification standards for COTRs/CORs. Its individual components do, however, have various COTR/COR certification requirements, and a Defense working group has prepared draft qualifications requirements, which include training, experience, and general competencies. Further, Defense reported that it expected to assign 800 COTRs/CORs to Recovery Act contracts from January through June 2010.

Civilian subagencies also reported that 62 percent of the COTRs/CORs working on Recovery Act acquisitions have met their continuous learning requirements. This compliance rate increases to 88 percent if the one subagency that has not implemented the certification program is excluded. Given the significance of agency contracting, it is essential that COTRs/CORs be certified and stay current with necessary educational requirements.

- ***Contract Program Managers***

Certification programs for contract program managers have been established for both Defense and civilian agencies. The separate programs are similar in that their requirements apply only to contract program managers assigned to major acquisitions. Within the civilian subagencies, over 900 program managers were to be assigned to Recovery Act contracts from January through June 2010, with almost 300 of them working on major acquisitions. For this period, 33 percent of the contract program managers assigned to Recovery Act contracts will be certified and 22 percent will satisfy their continuous learning requirements. It will be important for agencies to determine which of their acquisitions are considered major, and ensure that contract program managers doing this important work are certified and enhancing their knowledge and skills through continuous learning.

Defense reported that Recovery Act funds were not committed to major defense acquisition programs; as such, the program managers assigned to Recovery Act contracts are not subject to DAWIA's program manager certification requirements.

- ***Contracting Support Personnel***

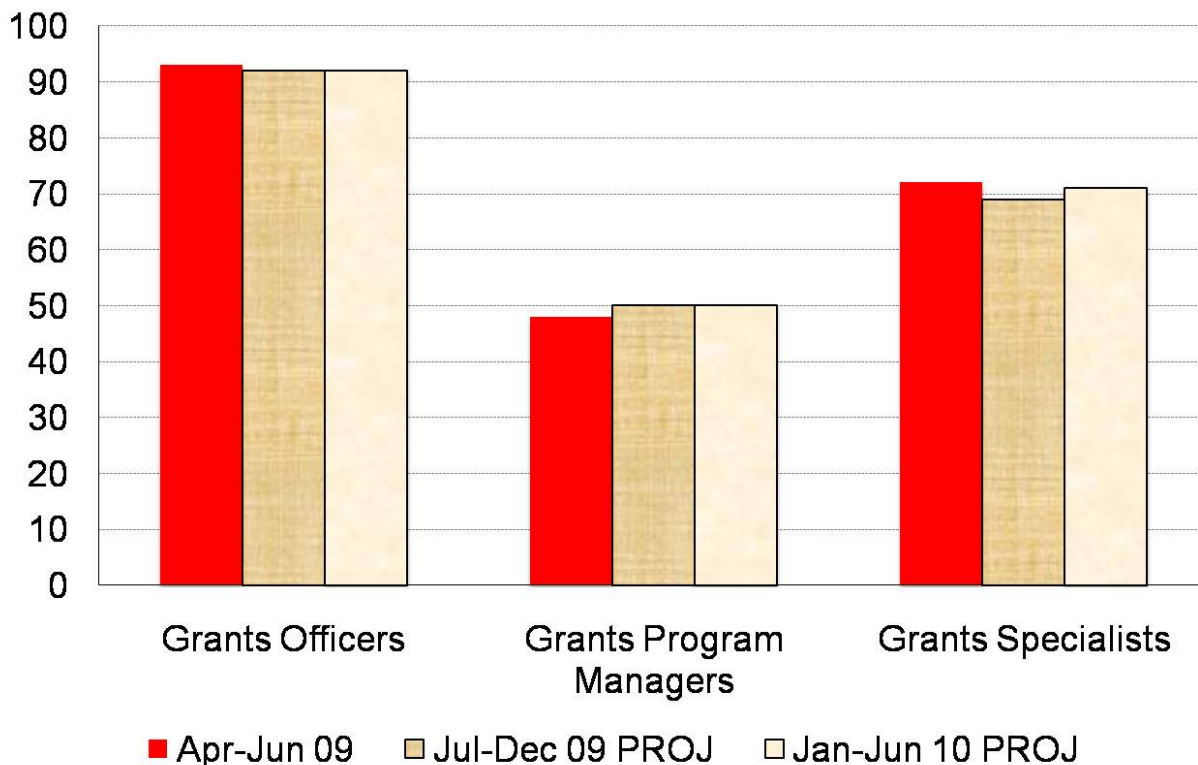
For the purpose of this review, “contracting support personnel” refers to a variety of positions within an agency, other than contracting officers, COTRs/CORs, and contract program managers, that support the acquisition function. No certification program applies specifically to individuals in these positions, yet some civilian subagencies reported that they require their contracting support personnel to pursue certification in an established acquisition career field, while a small number specifically stated that certification is not required. Civilian agencies expected to assign 950 contracting support personnel to the Recovery Act from January to June 2010, and reported that 61 percent will be certified. For the same period, Defense reported that 89 percent of its 833 contracting support personnel assigned to Recovery Act acquisitions will be certified.

GRANTS

Certification and Training

Managing Recovery Act grants is a cooperative effort involving three groups of employees: grants officers, grants program/project managers, and grants support specialists. Unlike the acquisition workforce that has specific certification and continuous learning requirements, there is no government-wide standard for the grants workforce. Without a common standard, a comparative analysis across agencies was not possible. However, in the absence of specific certification and continuous learning requirements, subagencies have developed their own requirements and methods by which to determine needed competencies.

Figure 12. Grants Personnel Working on Recovery Act Awards in Agencies That Do Not Have Agency-Specific Requirements, Actual and Projected, April 2009–June 2010 (%)



Agency-specific Requirements

As shown in Figure 12, most employees work for agencies that do not have structured competency-based requirements for developing their grants workforce. Approximately 8 percent of the grants officers, 50 percent of grants program managers, and 29 percent of grants specialists work in agencies that will have implemented agency-specific training and continuous learning requirements as of June 2010.

- ***Grants Officers***

The overwhelming majority of grants officers—92 percent—are not subject to certification requirements. Twenty-five of 70 subagency respondents reported that they have some combination of experience, specific education, training, and continuous learning requirements for their grants officers. These 25 subagencies account for the 8 percent of the grants officers responsible for awarding and administering Recovery Act funds.

Respondents reported that grants officers must have years of working experience in the financial assistance area, with some equating a grade level of General Schedule 15 or Senior Executive Service to the grants officer position. Educational requirements are being met by several different training venues, including private certification programs, the National Grants Management Association's training sessions and conferences, and online training courses in core competencies identified by the individual respondents. Additionally, a few respondents require that once such coursework is completed, grants officers must be recertified every 3 years. Several respondents commented that grants officers must have sound business and legal judgment; strong communications skills (both written and oral); excellent organizational skills; leadership skills; and a clear understanding of pertinent laws (including appropriations law), regulations (OMB Circulars), and agency-specific policies.

While almost two-thirds of respondents indicated that they have no specific requirements for their grants officers, many did comment that grants officers are senior agency officials who are responsible for and actively involved in the day-to-day management of grants programs and development of financial assistance policies. They also reported that experience in grants management and programmatic and analytical skills are essential to these positions.

- ***Grants Program Managers***

One-half of the grants program manager workforce are not subject to agency-specific requirements. Twenty-seven of 82 subagency respondents reported having specific certification or continuous learning requirements. These 27 subagencies account for half of the grants program managers overseeing Recovery Act awards.

Frequently, subagencies require that their grants program managers take training to develop a set of core competencies established by the agencies or subagencies themselves. These competencies include knowledge of competition, cost and budget reviews, and post-award monitoring. Additionally, due to the technical nature of the grants program manager's position, several respondents indicated that their specific training addresses both the specialized nature of the work and training in grants administration. Many of the subagencies that have implemented specific requirements also have recertification requirements (every 3–5 years) for their grants program managers.

Of the 55 respondents reporting having no specific requirements for these personnel, many cited the extensive experience required for them to be hired into these highly specialized positions (such as engineers, scientists, and health specialists). This experience includes minimum educational requirements, degrees in specific scientific fields, and related work experience.

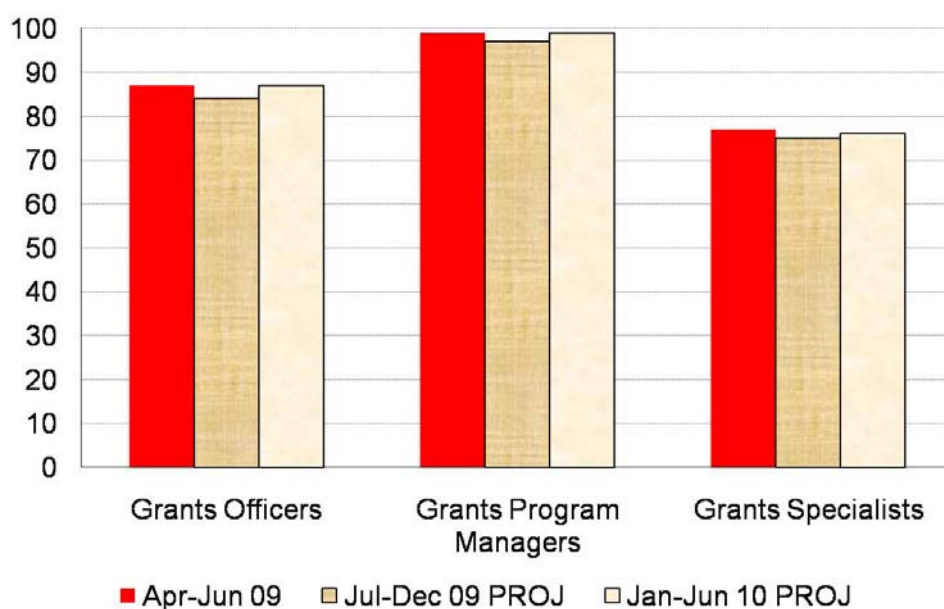
- **Grants Specialists**

Almost three-quarters of grants specialists—71 percent—are not subject to agency-specific certification or continuous learning requirements. Thirty-one of 73 subagency respondents reported having some combination of experience, training, or continuous learning requirements for their grants specialists. These 31 subagencies account for the 29 percent of grants specialists responsible for administering Recovery Act funds.

As with grant program managers, requirements for grant specialists are frequently based on core competencies identified by the agencies or subagencies. The coursework to certify grants specialists is often tied to the grade level of the employee. Among the 42 subagencies that do not presently have specific requirements for their grants specialists, grants’ training has been encouraged—and paid for. Several respondents reported that they pay for their staff to take a grants management certificate program from a private company. Others indicated that they use a mentoring or on-the-job training program, with oversight by more senior personnel.

Respondents reporting that their subagencies had specific requirements for grants workforce positions indicated a relatively high level of compliance with specific education, training, and continuous learning requirements. Figure 13 shows the rate of compliance with those requirements for each position in the grants workforce.

Figure 13. Grants Personnel Working on Recovery Act Awards Who Have Satisfied or Are Expected to Satisfy Agency-Specific Requirements, Actual and Projected, April 2009–June 2010 (%)



RECOMMENDATIONS

On the basis of our survey work, we have formulated the following recommendations:

We recommend that agencies continue to closely monitor their staffing of both Recovery Act and non-ARRA work, and make adjustments as necessary to ensure that all contracts and grants are properly awarded and monitored.

We also recommend that agencies assess training and certification issues for their contracting personnel. In particular, agencies should:

- Ensure that contracting officers meet continuous learning requirements to maintain their certifications,
- Identify COTRs/CORs working on Recovery Act contracts who lack certification and/or continuous learning requirements, and take corrective action, and
- Determine whether program managers working on major acquisitions under the Recovery Act are certified, and take appropriate steps to certify those who are not.

Further, absent government-wide standards for grants management personnel, agencies have established their own requirements. We see this as a best practice.

APPENDIX A: AGENCIES/SUBAGENCIES REPRESENTED IN THIS REPORT¹⁴

Corporation for National and Community Service

*Field Financial Management Center
Office of Grants Management
Office of the Inspector General
Office of Procurement Services*

Department of Agriculture

*Agricultural Marketing Service, Commodity Procurement
Agricultural Research Service
Departmental Management, Procurement Operations Division
Farm Service Agency, Commodity and Non-Commodity Offices
Food and Nutrition Service
Forest Service
National Institute of Food and Agriculture
Natural Resources Conservation Service
Office of the Inspector General
Rural Development*

Department of Commerce

*Census Bureau
Economic Development Agency
National Institute of Standards and Technology
National Oceanic and Atmospheric Administration
Office of the Secretary*

Department of Defense

Department of Education

*Federal Student Aid
Institute of Education Sciences
Office of the Chief Financial Officer
Office of Elementary and Secondary Education
Office of Innovation and Improvement
Office of Special Education and Rehabilitation Services*

¹⁴ Only 26 agencies are represented in this report. One agency did not respond; one lacked material data; and one recalled its surveys.

Department of Energy

*Golden Field Office
Idaho Operations Office
National Energy Technology Laboratory
National Nuclear Security Administration
Office of Civilian Radioactive Waste Management
Office of Environmental Management
Consolidated Business Center
Office of River Protection
Richland Operations Office
Savannah River Operations Office
Office of Headquarters, Procurement Services
Office of Science
Headquarters
Chicago Office
Oak Ridge Office
Western Area Power Administration*

Department of Health and Human Services

*Administration on Aging
Office of Administrative and Technology Services
Administration for Children and Families
Child Care Bureau
Office of Community Service
Office of Grants Management
Office of Head Start
Agency for Healthcare Research and Quality
Center for Medicare & Medicaid Services
Centers for Disease Control and Prevention
Child Care Bureau
Health Resources and Services Administration
Indian Health Service
National Institutes of Health
Office of Community Service
Office of Grants Management
Office of Head Start
Office of Public Health and Science
Office of the National Coordinator for Health Information Technology
Office of the Assistant Secretary for Resources and Technology
Program Support Center*

Department of Homeland Security

*Federal Emergency Management Agency, Grant Programs Directorate
Assistance to Firefighter Grants
Emergency Food and Shelter Grants*

*Operations
Program Management Office
Transit Security Grant Program
Immigration and Customs Enforcement
Office of the Undersecretary for Management
Transportation Security Administration
U.S. Coast Guard
U.S. Customs and Border Protection*

Department of the Interior

*Bureau of Indian Affairs
Bureau of Land Management
Bureau of Reclamation
Central Utah Project Completion Act
Fish and Wildlife Service
National Business Center
National Park Service
Office of the Inspector General
US Geological Service*

Department of Justice

*Bureau of Alcohol, Tobacco, Firearms, and Explosives
Justice Management Division, Procurement Services Staff
Office of Community Oriented Policing Services
Office of Justice Programs
Office on Violence Against Women*

Department of Labor

Department of State

Department of Transportation

*Federal Aviation Administration
Federal Highway Administration
Federal Railroad Administration
Federal Transit Administration
Maritime Administration*

Department of the Treasury

*Bureau of the Public Debt
Community Development Financial Institutions Fund
Financial Management Service
Office of the Fiscal Assistant Secretary
Office of the Procurement Executive
Procurement Services Division*

Department of Veterans Affairs

*National Cemetery Administration
Centralized Contracting Division
Construction Support Division
Memorial Service Networks I-V
Veterans Health Administration
Veterans Health Administration Geriatrics and Extended Care Service*

Environmental Protection Agency

*Cincinnati Procurement Operations Division
Office of Acquisition Management, Headquarters Procurement Operations Division
Office of Acquisition Management, Immediate Office
Office of Acquisition and Resource Management, Office of Grants and Debarment
Office of Acquisition Management; Policy, Training, and Oversight Division
Office of Acquisition Management, Superfund Regional Procurement Operations
Office of Air and Radiation
Office of Administration and Resources Management
Office of Grants and Debarment
Grants and Interagency Agreements Management
National Policy, Training, and Compliance Division
Office of Human Resources, Senior Environmental Employment Program
Office of Solid Waste and Emergency Response
Office of Water
Regions 1-10*

General Services Administration

*Federal Acquisition Service
Public Buildings Service*

National Aeronautics and Space Administration

National Endowment for the Arts

National Science Foundation

*Office of Budget, Finance, and Award Management
Office of the Inspector General*

Railroad Retirement Board

Small Business Administration

Smithsonian Institution

Social Security Administration

Treasury Inspector General for Tax Administration

U.S. Agency for International Development

APPENDIX B: OBJECTIVES, SCOPE, AND METHODOLOGY

The Recovery Act charged the Recovery Accountability and Transparency Board to review the sufficiency, qualifications, and training of contracts and grants staff overseeing Recovery Act funds. In May 2009, the Board asked the Department of Commerce OIG to develop a survey to obtain a snapshot of the Recovery Act acquisitions and grants workforce during the initial implementation of the Act. The survey document created is divided into seven discrete sections, each of which correlates to a specific segment of the acquisitions and grants workforce as set forth below.

A word about terminology: While the language of this report will generally be familiar to all readers, certain particular terms are unavoidably used—some with specific meanings related to how the survey was conducted and its results reported. These are explained in the following definitions:

TERM	REPORT USAGE
Acquisition	Synonymous with “contract.”
Agency	One of the federal departments or independent agencies, such as the Department of Labor or the Small Business Administration.
Contract	A mutually binding legal agreement obligating the seller to furnish supplies or services and the buyer to pay for them. For example, the government purchases satellite components through a contract.
FTEs (full-time equivalents)	The total number of regular hours worked by employees, divided by the number of compensable hours applicable to each fiscal year. All approved leave categories are considered hours worked.
Grant (financial assistance)	A distinct legal instrument used by the federal government to provide funding to nonfederal recipients to carry out a public purpose authorized by federal law. An example would be a grant to a school system to hire teachers.
Personnel	Individual employees.
Position	The seven categories of employees in the contracts and grants workforce.
Respondent	The particular entity (usually a subagency) answering the survey questions, by position, such as the response for grants specialists at the National Institutes of Health within the Department of Health and Human Services.
Subagency	An institutional entity within an agency, such as the Federal Aviation Administration (FAA) within the Department of Transportation. In most instances, responses to survey questions were submitted by subagencies, responding in terms of numbers of positions within their control.

In accordance with the Office of Federal Procurement Policy (OFPP), the following definitions of the positions that constitute the contracting workforce were used:

- *Contracting Officer (CO)*: A government employee authorized to enter into, modify, or terminate contracts on behalf of the federal government. Their responsibilities include acquisition planning, managing the evaluation of offers, and ensuring performance of the contract.
- *Contracting Officer's Technical Representative/Contracting Officer's Representative (COTR/COR)*: A government employee authorized to perform administrative and/or technical functions associated with contract performance by virtue of a delegation of authority from the contracting officer.
- *Contract Program Manager/Contract Project Manager (CPM)*: A government employee who manages the program or project that a particular contract is supporting.
- *Contracting Support Personnel (CSP)*: All other government employees whose primary responsibilities involve government contracting, from contracting specialists without warrants (authority to award contracts), to agency policy and procurement executives and their staffs.

Unlike the contracts workforce, there is no standardized structure for the grants workforce. As a result, the grants workforce is structured differently from agency to agency across the federal government. This survey attempts to provide comprehensive definitions in order to capture the authorizing management, policy, oversight, and support personnel who award and administer grants as described below.

- *Grants Officer (GO)*: A government employee with authority to approve awards and amendments that obligate or deobligate funds and to oversee the business management and administrative aspects of grants or cooperative agreements.
- *Grants Program Manager/Grants Project Manager (GPM)*: Government employees who manage the programmatic aspects of grants or cooperative agreements, including tracking the recipient's progress and comparing actual accomplishments with goals and objectives established in the award.
- *Grants Specialist/Grants Support Personnel (GS)*: The government employees who support the Grants Officer in the business management of grants and cooperative agreements, including oversight personnel who create policy and guidance.

Through the Board's committee and working group structure,¹⁵ the survey was provided to the 29 OIG offices responsible for the oversight of the Recovery Act¹⁶ for review and comment during June 2009. The survey was revised, as appropriate, based on input received from this vetting process. The survey instrument was then tested in July by four OIG offices and their agencies, each of which were with provided with a set of instructions, definitions, and assumptions for implementing the survey. The results of this test allowed us to make improvements to the survey instrument, providing additional structure and a more detailed set of instructions to assist the respondents in providing accurate information.

The survey was transmitted to the 29 OIGs on July 24, 2009. It was left to the discretion of the OIG of each agency to determine the method for completing the survey, taking into consideration recent or ongoing audit work of the acquisitions and grants workforce and the agency's handling of Recovery Act funds for contracts and grants. The surveys were designed to be a set of self-administered questionnaires that captured information on the sufficiency of acquisitions and grants personnel overseeing Recovery Act funds, whether they were certified according to standards established by OFPP, and whether they are receiving adequate training.

On the basis of discussions with the OIG community during preparation of the survey, it was anticipated that the survey would, in most instances, be completed at the contracting or grant-making activity level of each agency. Since there was limited opportunity for the OIG offices to validate those data, we structured the survey to assist the respondent in reporting valid and consistent information over three separate timeframes. If a methodology other than a self-administered questionnaire was used by any of the OIGs, they were instructed to provide an explanation of the steps taken with the agency to complete the questionnaire. We were not advised of any other methodologies used.

To facilitate completion of the survey, the Board's Chairman requested that each agency's senior accountable Recovery Act official provide whatever assistance was requested by OIG, including, if required, that he or she oversee completion of the survey by agency procurement and grants officials.

Agencies packaged survey responses in various ways. Some sent one consolidated survey, while others sent separate responses by subagency. For example, the Department of State sent one survey response, while the Department of Transportation sent five, one each from the Federal Aviation Administration, Federal Highway Administration, Federal Railroad Administration, Federal Transit Administration, and the Maritime Administration. Further, not every subagency responded to all seven sections of the survey, presumably answering

¹⁵ The Recovery Funds Working Group Committee oversaw this review and the survey was vetted by the Committee's Recovery Spending Working Group of which all 29 OIGs are members.

¹⁶ Only 26 agencies are represented in this report. One agency did not respond; one lacked material data; and one recalled its surveys.

only relevant sections. Some agencies or subagencies enter into contracts, but do not award grants. A complete list of agencies and subagencies appears in Appendix A.

The organization of the survey and certain questions directed to the acquisitions workforce are based on requirements in the following memoranda from OFPP, and they can be found at www.whitehouse.gov/omb/procurement_index_workforce/:

- Federal Acquisition Certification in Contracting Program (FAC-C) (January 20, 2006)
- Federal Acquisition Certification for Contracting Officer's Technical Representatives (FAC-COTR) (November 26, 2007)
- Federal Acquisition Certification for Program and Project Managers (FAC-P/PM) (April 25, 2007)
- OFPP Policy Letter 05-01 (April 15, 2005)

Since there were no corresponding requirements for the grants workforce, the surveys and certain questions directed to them are similar in design to the acquisitions workforce but the questions about training and specific certifications are not based on requirements from any oversight body.

Completed surveys were returned electronically to Commerce OIG in September 2009. The completed surveys were quality checked through an analysis of outliers, and minor edits were made to insure consistency amongst the responses. Additionally, in a few instances when there was questionable data found in the responses, we contacted the respondent to clarify the data where the inconsistency would have a material impact on the survey results. In these circumstances, the data were revised, as appropriate, based on discussions with the respondents.

Agencies reported the number of personnel assigned or expected to be assigned to the award and administration of Recovery Act contracts and grants and the percentage of time those employees would spend on Recovery Act-related duties. From these data, the number of hours and full-time-equivalent positions were determined for each agency, and agencies were categorized as *Large* or *Other* based on a statistical analysis of the information each provided. When responses for the combined Recovery Act contracts and grants workforce are totaled, three agencies are considered to be *Large*: the Department of Defense, the Department of the Interior, and the Department of Health and Human Services (HHS). For this review, the remaining 23 agencies are aggregated as *Other*.

In this analysis, we measured a positively skewed distribution, meaning that a few cases present a very large proportion of the total for a characteristic. In order to provide a more meaningful analysis, we segmented our universes into two categories: *Large* and *Other* agencies. We calculated these segments by selecting all cases with characteristic values

greater than one standard deviation from the mean on the positive side of the distribution and identified them as Large.

The results of the completed surveys were used to create this consolidated report, which was distributed in draft form to OIGs. We received comments to the draft from 11 of the 26 agencies, along with the Recovery Act Transparency Board staff and the Office of Federal Procurement Policy. We have made changes to the report as appropriate based on these comments.

We conducted the survey at the request of the Recovery Accountability and Transparency Board. We performed this review in response to a statutory requirement in the American Recovery and Reinvestment Act of 2009 that directs the Board to review the sufficiency and qualifications of the acquisition and grants personnel working on the Recovery Act. This work does not constitute an audit under generally accepted government auditing standards.

APPENDIX C. SURVEY DISCLAIMERS

- The survey was dependent on the Inspectors General of the 29 recipient agencies to distribute and oversee in their respective agencies.
- Errors or distortions due to non-response may exist. There was no defined list of potential respondents.
- Answers to the survey depended on respondents' honesty, and ability to respond.
- Critical survey questions required yes/no answers, restricting respondent choice in answering.
- Some answers are not supported by or are inconsistent with accompanying comments.
- Some survey questions required respondents to conduct research in order to answer. This can lower response rates and introduce error.

APPENDIX D. TABLES RELATING TO FIGURES IN THE REPORT TEXT

Table for Figure 1. *Contracts and Grants Recovery Act Staffing Generally Viewed as Inadequate, Adequate, or Adequate But with Impact on Non-Recovery Act Work*

Large Agencies	Contracts Responses	Grants Responses	Total Responses	Percentages
Staffing adequate, no impact	6	5	11	14%
Staffing adequate, but impact on non-Recovery Act work	12	24	36	45%
Staffing inadequate	15	18	33	41%
Total	33	47	80	100%

Other Agencies	Contracts Responses	Grants Responses	Total Responses	Percentages
Staffing adequate, no impact	82	28	110	24%
Staffing adequate, but impact on non-Recovery Act work	137	102	239	52%
Staffing inadequate	63	44	107	23%
No response	2	4	6	1%
Total	284	178	462	100%

Table for Figure 2. *Employees, by Position, Assigned to Recovery Act Contracts and Grants, Actual and Projected, April 2009–June 2010*

	April-June 2009	July-December 2009	January-June 2010
CO	2,686	2,837	2,881
COTR	3,763	4,890	5,520
CPM	2,498	2,544	1,910
CSP	1,580	1,785	1,783
Total	10,527	12,056	12,094
GO	2,112	2,183	2,171
GPM	7,383	8,092	8,086
GS	2,405	2,662	2,579
Total	11,900	12,937	12,836
Grand Total	22,427	24,993	24,930

Contracts and Grants Workforce Staffing and Qualifications Review

Table for Figure 3. *Full-Time-Equivalent (FTE) Employees Assigned to Large Agency Recovery Act Contracts and Grants, Actual and Projected, April 2009–June 2010*

	April-June 2009	July-December 2009	January-June 2010
CO	135	287	284
COTR	112	421	496
CPM	209	447	299
CSP	118	245	251
Total	574	1,400	1,330
GO	26	65	58
GPM	462	908	854
GS	43	109	87
Total	531	1,082	999
Grand Total	1,105	2,482	2,329

Table for Figure 4. *Full-Time-Equivalent (FTE) Employees Assigned to Other Agency Recovery Act Contracts and Grants, Actual and Projected, April 2009–June 2010*

	April-June 2009	July-December 2009	January-June 2010
CO	133	358	382
COTR	87	345	412
CPM	43	159	138
CSP	36	91	88
Total	299	953	1,020
GO	52	115	106
GPM	208	557	552
GS	182	289	170
Total	442	961	828
Grand Total	741	1,914	1,848

Contracts and Grants Workforce Staffing and Qualifications Review

Table for Figures 5, 6, and 7. *Contracts—Sufficiency of ARRA Staffing Overall, for Large Agencies, and for Other Agencies*

	Large		Other		Total	
	Response	Percentage	Response	Percentage	Response	Percentage
Staffing adequate, little/no impact	6	18%	82	29%	88	28%
Staffing adequate, but impact on non-Recovery Act work	12	36%	137	48%	149	47%
Staffing inadequate	15	46%	63	22%	78	25%
No Response	0	—	2	1%	2	1%
Total	33	100%	284	100%	317	101%^a

^a Percentages do not always add to 100 due to rounding or the exclusion of minimal non-response rates.

Table for Figures 8, 9, and 10. *Grants—Sufficiency of ARRA Staffing Overall, for Large Agencies, and for Other Agencies*

	Large		Other		Total	
	Response	Percentage	Response	Percentage	Response	Percentage
Staffing adequate, little/no impact	5	11%	28	16%	33	15%
Staffing adequate, but impact on non-Recovery Act work	24	51%	102	57%	126	56%
Staffing inadequate	18	38%	44	25%	62	28%
No Response	0	—	4	2%	4	2%
Total	47	100%	178	100%	225	101%^a

^a Percentages do not always add to 100 due to rounding or the exclusion of minimal non-response rates.

Tables A–D for Figure 11. *Certification of Employees Assigned to Recovery Act Contracts, by Position, Actual and Projected, April 2009–June 2010 (%)*

A. Certification of Contracting Officers Assigned to Recovery Act Contracts, Department of Defense and Civilian Agencies

	April–June 2009		July–December 2009		January–June 2010	
	Civilian Agencies	Department of Defense	Civilian Agencies	Department of Defense	Civilian Agencies	Department of Defense
Total Assigned	1,913	773	2,223	614	2,319	562
Total Certified ^a	1,862	766	2,096	578	2,238	526
Percentage Certified	97%	99%	94%	94%	97%	94%

^a Includes waivers

B. Certification of COTRs/CORs Assigned to Recovery Act Contracts at Civilian Agencies^a

	April–June 2009	July–December 2009	January–June 2010
Total Assigned	3,161	4,140	4,719
Total Certified ^b	1,610	2,870	3,521
Percentage Certified	51%	69%	75%

^a Department of Defense has not established a certification program for its COTRs/CORs.

^b Includes waivers

C. Certification of Contract Program Managers Assigned to Recovery Act Contracts at Civilian Agencies^a

	April–June 2009	July–December 2009	January–June 2010
Total Assigned	719	816	904
Total Certified ^b	202	255	297
Percentage Certified	28%	31%	33%

^a Department of Defense reported that none of its Recovery Act contracts are major acquisitions; therefore, CPM certification is not required.

^b Includes waivers

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D. Certification of Contracting Support Personnel Assigned to Recovery Act Contracts, Department of Defense and Civilian Agencies

	April–June 2009		July–December 2009		January–June 2010	
	Civilian Agencies	Department of Defense	Civilian Agencies	Department of Defense	Civilian Agencies	Department of Defense
Total Assigned	741	839	928	857	950	833
Total Certified	398	742	555	760	583	745
Percentage Certified	54%	88%	60%	89%	61%	89%

Table for Figure 12. *Grants Personnel Working on Recovery Act Awards in Agencies that Do/Do Not Have Agency-Specific Requirements, April 2009–June 2010*

	April–June 2009		July–December 2009		January–June 2010	
	No Agency-specific Requirements	Agencies Have Requirements	No Agency-specific Requirements	Agencies Have Requirements	No Agency-specific Requirements	Agencies Have Requirements
Grants Officers	1,959	153	2,003	181	1,991	181
Grants Program Managers	3,549	3,834	4,026	4,066	4,025	4,061
Grants Specialists	1,721	685	1,844	819	1,832	747
Total	7,229	4,672	7,873	5,066	7,848	4,989

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Table for Figure 13. *Grants Personnel Working on Recovery Act Awards Who Have Satisfied or are Expected to Satisfy Agency-Specific Requirements, April 2009–June 2010*

	April–June 2009		July–December 2009		January–June 2010	
	Satisfied or Expected to Satisfy	Agencies Have Requirements	Satisfied or Expected to Satisfy	Agencies Have Requirements	Satisfied or Expected to Satisfy	Agencies Have Requirements
Grants Officers	133	153	152	181	157	181
Grants Program Managers	3,790	3,834	3,943	4,066	4,039	4,061
Grants Specialists	526	685	617	819	564	747
<i>Total</i>	4,449	4,672	4,712	5,066	4,760	4,989

**APPENDIX E. TABLES CONTAINING ADDITIONAL DETAIL
ON DATA COLLECTED**

Table E-1. *Contracts and Grants Employees, by Position, Working at Subagencies that Received Recovery Act Funds, Actual and Projected, April 2009–June 2010*

	April-June 2009	July-December 2009	January-June 2010
CO	10,924	11,252	11,624
COTR	38,908	39,253	40,424
CPM	11,503	11,734	12,128
CSP	10,567	11,269	11,482
Total	71,909	73,508	75,658
GO	2,456	2,489	2,499
GPM	20,841	21,509	21,699
GS	3,519	3,703	3,727
Total	26,816	27,701	27,925
Grand Total	98,725	101,209	103,583

Table E-2. *Total Hours Available for Employees, by Position, Assigned to Recovery Act Contracts and Grants, Actual and Projected, April 2009–June 2010^a*

	April-June 2009	July-December 2009	January-June 2010
CO	1,396,720	2,950,480	2,996,240
COTR	1,956,760	5,085,600	5,740,800
CPM	1,298,960	2,645,760	1,986,400
CSP	821,600	1,856,400	1,854,320
Total	5,474,040	12,538,240	12,577,760
GO	1,098,240	2,270,320	2,257,840
GPM	3,839,160	8,415,680	8,409,440
GS	1,250,600	2,768,480	2,682,160
Total	6,188,000	13,454,480	13,349,440
Grand Total	11,662,040	25,992,720	25,927,200

^a Agencies reported on the number of employees assigned and percentage of time worked or expected to work on Recovery Act acquisitions and grants for each of the three time periods from April 2009 through June 2010. These percentages were converted to FTEs and hours using the standard measurement of 2,080 hours per calendar year for 1 FTE. Thus, to calculate the number of hours in employees' full time schedules for the 3-month period April-June 2009, the total number of employees assigned to the Recovery Act for that period was multiplied by 520 hours (25 percent of 2,080 hours). For the 6-month periods, the number of employees assigned to Recovery Act work was multiplied by 1,040 to determine full-time schedules. A further calculation (see table E-3) was computed using the percentages reported to determine the number of hours that each responding entity was devoting to the Recovery Act during each period.

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Table E-3. *Hours Reported Worked by Employees on Recovery Act Contracts and Grants, by Position, Actual and Projected, April 2009–June 2010*

	April-June 2009	July-December 2009	January-June 2010
CO	556,542	1,338,389	1,381,837
COTR	412,764	1,592,397	1,889,597
CPM	628,031	1,259,034	1,014,166
CSP	331,650	698,476	696,529
Total	1,928,986	4,888,296	4,982,129
GO	162,449	375,821	341,744
GPM	1,394,684	3,041,826	2,917,677
GS	260,464	619,333	535,444
Total	1,817,597	4,036,980	3,794,865
Grand Total	3,746,583	8,925,276	8,776,994

Table E-4. *Impacts Reported on Acquisition Workforce as a Result of Recovery Act Workload, Actual and Projected, April 2009–June 2010.*

	Insufficient Staff for ARRA Work		Sufficient Staff, but with Impact on Non-ARRA Work^a		TOTAL
	Large Agencies	Other	Large Agencies	Other	
<i>on Recovery Act Work:</i>					
Delays ^b	14	24			38
Decreased post-award monitoring	6	23			29
Increased staff time	2	7			9
Supplemental staff	2	26			28
<i>on Non-Recovery Act Work</i>					
Delays	13	43	11	76	143
Decreased post-award monitoring	7	31	6	21	65
Increased staff time	2	8	7	42	59
Supplemental staff	2	7	2	53	64

^a Respondents who had indicated they had sufficient staff for Recovery Act work were asked to specify only whether there had been any impact on their non-Recovery Act work.

^b With regard to Recovery Act work, “delays” refers primarily to awards.

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Table E-5. *Impacts Reported on Grants Workforce as a Result of Recovery Act Workload, Actual and Projected, April 2009–June 2010*

	Insufficient Staff for ARRA Work		Sufficient Staff, but with Impact on Non-ARRA Work ^a		TOTAL
	Large Agencies	Other	Large Agencies	Other	
<i>on Recovery Act Work:</i>					
Delays ^b	9	20			29
Decreased post-award monitoring	4	24			28
Increased staff time	0	13			13
Supplemental staff	13	6			19
<i>on Non-Recovery Act Work</i>					
Delays	7	25	20	56	108
Decreased post-award monitoring	2	25	11	22	60
Increased staff time	0	5	11	42	58
Supplemental staff	6	2	7	66	81

^a Respondents who had indicated they had sufficient staff for Recovery Act work were asked to specify only whether there had been any impact on their non-Recovery Act work.

^b With regard to Recovery Act work, “delays” refers primarily to awards.

Table E-6. *Numbers of Subagencies Reporting Sufficient Contracts and Grants Personnel to Award and Administer Recovery Act Contracts and Grants*

	Subagencies			Responses
	YES	NO	No answer	
CO	70	19	1	89
COTR	70	23	0	93
CPM	41	13	1	54
CSP	56	23	0	79
GO	58	12	0	70
GPM	53	29	0	82
GS	48	21	4	69

Table E-7. *Compliance by Employees Assigned to Recovery Act Contracts, by Position, with Continuous Learning Requirements, Actual and Projected, April 2009–June 2010*

	Current on Continuous Learning Requirements	Assigned^a	Percentage Current on Continuous Learning Requirements
Civilian Contract Officers	1,427	2,319	62%
Defense Contract Officers	653	773	85%
Civilian COTRs/CORs ^b	2,934	4,719	62%
Contract Program Managers ^c	196	904	22%

^a Civilian agency information is for the period ending June 2010. Information from the Department of Defense is for the 3-month period ending June 2009.

^b One agency representing 30% of all COTRs/CORs assigned to the Recovery Act has not implemented certification requirements for its COTRs/CORs and thus did not report any staff current on continuous learning requirements. By removing this agency's data from the calculation, the resulting percentage of COTRs/CORs working on Recovery Act contracts that are current on the continuous learning requirements is 88%.

^c Defense reported that it has not assigned any CPMs to Recovery Act acquisitions that require certification.

Table E-8. *Grants Respondents Working on the Recovery Act That Have Specific Education/Training Requirements*

Position	Yes	Respondents Reporting	Percentage of Respondents Having Specific Requirements
Grants Officer	25	70	36%
Grants Program Manager	27	82	33%
Grants Specialist	31	73	42%