



U.S. ENVIRONMENTAL PROTECTION AGENCY

OFFICE OF INSPECTOR GENERAL

***Hotline Report:
Operating efficiently and effectively***

EPA Needs to Improve Oversight of Invoice Reviews and Contractor Performance Evaluation

Report No. 21-E-0031

December 1, 2020



Report Contributors:

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Abbreviations

C.F.R.	Code of Federal Regulations
CO	Contracting Officer
COR	Contracting Officer's Representative
CPARS	Contractor Performance Assessment Reporting System
EPA	U.S. Environmental Protection Agency
ITSSS	Information Technology System Security Staff
OIG	Office of Inspector General

Cover Image: Improvements are needed in invoice reviews and contractor performance evaluation. (EPA OIG graphic)

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At a Glance

Why We Did This Evaluation

The U.S. Environmental Protection Agency's Office of Inspector General received a hotline complaint in September 2019 regarding a \$12 million contract for information technology support services performed by Attain, the Agency's contractor for information technology support.

The objective of this evaluation was to determine whether the EPA paid Attain for services that were either not performed or performed by other EPA contractors.

This evaluation addresses the following:

- *Operating efficiently and effectively.*

This evaluation addresses a top EPA [management challenge](#):

- *Complying with key internal control requirements (policies and procedures).*

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List of [OIG reports](#).

EPA Needs to Improve Oversight of Invoice Reviews and Contractor Performance Evaluation

What We Found

We did not find evidence that the EPA paid Attain for information security services that were either not performed or performed by other EPA contractors. We found, however, that the EPA did not perform certain contract management duties for the Attain contract. In particular, the multiple contracting officers overseeing the Attain contract did not complete (1) the required invoice review during the task order's base year period and (2) the contractor performance evaluation. EPA directives prescribe the requirements for performing these key management oversight activities. These activities were not completed because the outgoing contracting officers did not complete the contract transition checklist and transition memorandum, which would have notified the incoming contracting officer about critical contract monitoring tasks that needed to be completed. Further, the EPA lacked processes to notify contract management when contracting officers did not review invoices periodically or initiate the contractor performance evaluation in the Contractor Performance Assessment Reporting System.

Effective contract management practices safeguard the EPA from remitting costs that are not allowable, allocable, and reasonable.

Recommendations and Planned Agency Corrective Actions

We recommend that the assistant administrator for Mission Support (1) implement controls to alert the Office of Acquisition Solutions management when required annual invoice reviews are not completed and contractor performance evaluations are not initiated; (2) review all Attain task order invoices commencing with the base year and recoup any overpayments; (3) remind contracting officers to complete contract transition checklists and transition memorandums when transferring task orders, including contracts, between contracting officers; and (4) require the contracting officer to complete the base year performance evaluation.

The Agency concurred with all recommendations and provided acceptable corrective actions and estimated milestone dates. The Agency completed corrective actions for one of the recommendations. The remaining four recommendations are resolved with corrective actions pending.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

THE INSPECTOR GENERAL

December 1, 2020

MEMORANDUM

SUBJECT: EPA Needs to Improve Oversight of Invoice Reviews and Contractor Performance Evaluation
Report No. 21-E-0031

FROM: Sean W. O'Donnell 

TO: Donna Vizian, Principal Deputy Assistant Administrator
Office of Mission Support

This is our report on the subject evaluation conducted by the Office of Inspector General of the U.S. Environmental Protection Agency. The project number for this evaluation was OA&E-FY20-0107. This report contains findings that describe the problems the OIG has identified and corrective actions the OIG recommends. Final determinations on matters in this report will be made by EPA managers in accordance with established audit resolution procedures.

The Office of Acquisition Solutions within the Office of Mission Support is primarily responsible for the issues discussed in this report.

In accordance with EPA Manual 2750, your office completed the corrective actions for Recommendation 3 and provided acceptable corrective actions and estimated milestone dates in response to the remaining OIG recommendations. All recommendations are resolved, and no final response to this report is required. However, if you submit a response, it will be posted on the OIG's website, along with our memorandum commenting on your response. Your response should be provided as an Adobe PDF file that complies with the accessibility requirements of Section 508 of the Rehabilitation Act of 1973, as amended. The final response should not contain data that you do not want to be released to the public; if your response contains such data, you should identify the data for redaction or removal along with corresponding justification.

We will post this report to our website at www.epa.gov/oig.

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Purpose

This evaluation is the result of an anonymous hotline complaint sent on September 17, 2019, to the U.S. Environmental Protection Agency's Office of Inspector General regarding information security support services performed by Attain, the Agency's contractor for information security

support. The objective was to determine whether the EPA paid Attain for services that were either not performed or performed by other EPA contractors.

Top Management Challenge

This evaluation addresses the following top management challenge for the Agency, as identified in OIG Report No. [20-N-0231](#), *EPA's FYs 2020–2021 Top Management Challenges*, issued July 21, 2020:

- Complying with key internal control requirements (policies and procedures).

Background

The hotline complaint stated that there is significant fraud, waste, and abuse concerning the Office of Information Technology Systems Security Staff, known as ITSSS, and its director. The hotline complaint alleged that the EPA paid Attain millions of taxpayer dollars for work not completed or completed by other contractors.

Snapshot of Task Order

On August 27, 2018, the EPA awarded Attain Task Order No. 68HE0H18F1516 under Contract No. GS-35F-0534W, valued at \$12,527,900. The task order has a one-year base period that started on August 28, 2018, and four one-year options ending August 27, 2023. The task order is for information security support for Agency systems and applications, as well as:

- Baseline compliance with the Agency's information security directives.
- Risk management framework evaluations.
- Plan of Action and Milestones reviews.

Relevant Invoice Review and Performance Evaluation Requirements

The EPA Acquisition Guide, dated December 2019, states:

- Under section 32.9.1.5(b)(4), the responsibility for invoice review and approval is first vested with the contracting officer, but with the CO's approval, may be delegated to the contracting officer's representative. A CO's periodic monitoring must include at least one detailed review of a contract invoice for each contract year.

- Under section 32.9.1.5(b)(4)(xv), “COs perform periodic monitoring of a COR/Invoice/Voucher Approving Official’s invoice review.”

The Office of Acquisition Management’s *Invoice Review & Approval Desk Guide*, dated March 13, 2015, states:

It is EPA’s policy to review invoices thoroughly to ensure that adequate information, proper rationale, and documentation exists to support payment of contractor invoices in a timely manner.

The following Federal Acquisition Regulation provisions pertain to this evaluation:

- 48 C.F.R. § 42.1502(a) requires that past performance evaluations be prepared at least annually and at the time the work under a contract or order is completed.
- 48 C.F.R. § 42.1503(e) requires agencies to conduct frequent evaluations for compliance with the reporting requirements in 48 C.F.R. § 42.1502 so that agencies can promptly identify delinquent past performance reports.
- 48 C.F.R. § 42.1503(f) requires agencies to prepare and submit performance evaluations in the Contractor Performance Assessment Reporting System.

EPA Acquisition Guide sections 42.15.1.5.1 and 42.15.1.5.3 require contractor performance evaluations to be completed in CPARS within 120 days from contract completion for contracts less than one year or within 485 days from the contract award date for multiyear contracts and every 365 days thereafter. When transferring a contract to another contracting officer, section 42.15.1.5.1(e) of the Guide requires the CO to prepare a transition memorandum summarizing the contractor’s performance to date and to include the memorandum in the contract file.

Responsible Office

The EPA’s Office of Acquisition Solutions, within the Office of Mission Support, is responsible for planning, awarding, and administering contracts. COs in the Office of Acquisition Solutions are responsible for awarding and administering contracts, reviewing invoices periodically, and submitting the contractor’s past performance evaluations into CPARS.

Scope and Methodology

We conducted this evaluation from February through September 2020 in accordance with the *Quality Standards for Inspection and Evaluation* published in January 2012 by the Council of the Inspectors General on Integrity and Efficiency. Those standards require that we plan and perform the evaluation to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings, conclusions, and recommendations based on our objectives. We believe that the evidence obtained provides a reasonable basis for our findings, conclusions, and recommendations based on our review.

To understand contractual and acquisition requirements, we reviewed the following documentation:

- Task Order No. 68HE0H18F1516 under Contract No. GS-35F-0534W, as well as modifications associated with information technology support services.
- Federal Acquisition Regulation provisions 48 C.F.R. § 42.1502(a), 48 C.F.R. § 42.1503(e), and 48 C.F.R. § 42.1503(f).
- EPA Acquisition Guide.
- Office of Acquisition Management's *Invoice Review & Approval Desk Guide*.

We also performed the following activities related to the EPA's contract administration of this task order:

- Selected seven information technology systems with the highest labor hours charged from June through September 2019 to evaluate Attain's work performance. Those sample systems included:
 - Drupal Web Content Management System for one EPA Web.
 - Email & Collaboration Services.
 - Enterprise Voice System.
 - EPA Acquisitions System.
 - Headquarters Physical Access Control System.
 - National Advanced Utility Metering System.
 - System of Registries.
- Interviewed the COs and the contracting officer's representative to understand their responsibilities under the task order.

- Interviewed the current COR about the invoice review and approval process. We did not interview the former COR who left the EPA in December 2019 before we started the evaluation.
- Interviewed the ITSSS director to obtain an overview of processes used to monitor the contractor's work performance.
- Interviewed the information security officer and information system security officers associated with the sample systems to obtain feedback on the quality of the contractor's work performance.
- Reviewed invoices from June through September 2019 to determine whether the COR maintained documentation to support review and approval of invoices for payments.
- Reviewed [CPARS.gov](https://www.cpars.gov) to determine whether Attain's performance evaluation was reported for the task order's base year, which was from August 28, 2018, through August 27, 2019.
- Interviewed the EPA's information technology security official and reviewed other information technology security contracts to determine whether there were contract services duplicative of the Attain task order.

We obtained a copy of the unsigned contract transition checklist prepared by the previous CO, which identified outstanding actions requiring the next CO's attention, such as completing the CPARS evaluation for the base year. We noted that the unsigned checklist had erroneous contractor personnel information. We could not verify the validity of the checklist because the CO at the time of this evaluation stated that the official signed copy of the transition checklist is located in the office. The EPA was under mandatory telework during the evaluation process for this report because of the coronavirus pandemic and therefore, we were not able to review it.

Actions Taken by the Agency

During the evaluation, we found that the ITSSS did not have controls in place to maintain records to validate that billed costs for the reviewed monthly invoices were allowable, allocable, and reasonable as required by the Federal Acquisition Regulation and EPA contract management directives. The former ITSSS COR, who reviewed the sampled invoices, used Attain's monthly status reports to validate billed invoice amounts. However, the reports' totals did not match the sampled invoice amounts for June, July, August, and September 2019.

We issued a discussion document on May 14, 2020, and subsequently met with management in the Office of Mission Support to discuss these issues. The ITSSS director provided us with additional internal control documents used to monitor

Attain's progress on completing contract deliverables, which were not included in the former COR's invoice review file. Additionally, we met with the current COR who provided sufficient evidence that the COR (1) reviewed monthly invoices starting with the January 2020 invoice; and (2) maintained documentation to support that invoice costs were allowable, allocable, and reasonable. Since the current COR followed the internal control procedures established by the ITSSS director, we did not make recommendations for ITSSS to implement controls to maintain records to validate billed costs.

Results of Evaluation

We did not find evidence to support the hotline allegation that the EPA paid Attain for information security services that were either not performed or performed by other EPA contractors. The EPA did not, however, perform certain, required contract management duties for the Attain contract. Throughout the task order's base year, there were four COs overseeing the Attain contract at different times. These COs did not complete the required invoice review or the contractor performance evaluation because the outgoing COs did not complete the contract transition checklist and transition memorandum, which would have notified the incoming CO about critical contract monitoring tasks that needed to be completed. Further, the EPA lacked processes to notify contract management when COs did not review invoices periodically or initiate the contractor performance evaluation in CPARS.

The EPA reviewed the January 2019 invoice, valued at \$22,533, after we brought the lack of periodic invoice reviews to the CO's attention. The EPA's invoice review indicated that Attain submitted inaccurate labor rates on the invoice. Since this was the only invoice review conducted by the CO, the EPA could have overpaid Attain for the entire 2019 calendar year. Additionally, when contractor performance evaluations are not conducted, the EPA lacks the performance-based information required to make an informed decision about whether it should continue a business relationship with the contractor.

COs Did Not Perform Required Periodic Invoice Reviews

The EPA COs did not perform the required invoice reviews for the task order's base year as required by EPA's Acquisition Guide. Per the Acquisition Guide section:

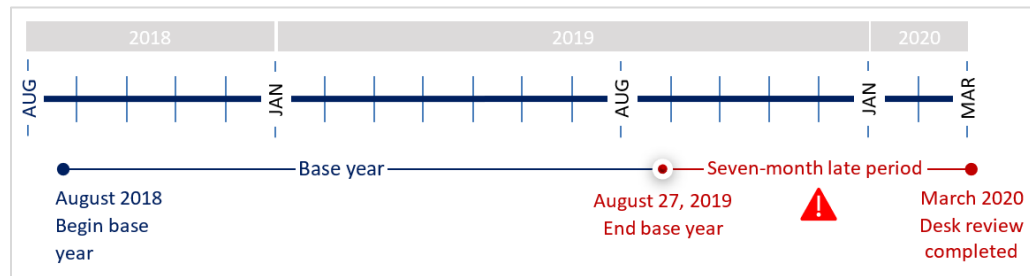
- 32.9.1.5(b)(4), "The responsibility for invoice review and approval is first vested with the CO, but with the CO's approval, may be delegated to the COR. A CO's periodic monitoring must include at least one detailed review of a contract invoice for each contract year."

- 32.9.1.5(b)(4)(xv), “COs perform periodic monitoring of a COR/Invoice/Voucher Approving Official’s invoice review.”

The EPA lacks a process to alert contract management when COs do not perform the required invoice reviews, required by EPA policy, for each contract year. We noted that multiple COs oversaw the task order during the base year, and each provided various reasons why they did not complete the invoice review.

In response to our March 2020 inquiry regarding the lack of a periodic invoice review, one of the previous COs reviewed the January 2019 invoice in March 2020, seven months after the August 27, 2019 end date of the task order’s base year, which was the latest date the CO should conduct an invoice review (Figure 1). The CO who completed the invoice review discovered that some of the labor rates on the January 2019 invoice, totaling \$22,533, did not match the hourly labor rates in the contractor’s price submission. That CO requested that the existing CO coordinate with the COR to ask the contractor to submit a revised invoice with the correct hourly rates for the January 2019 invoice. However, the existing CO at the time of this evaluation had not taken action necessary to have the contractor submit an updated invoice or conduct subsequent invoice reviews for the remaining months of the base year through the first option year to identify any irregularities in billing cost.

Figure 1: Timeline of CO periodic invoice review for task order’s base year



Source: OIG analysis. (EPA OIG graphic)

The COs would have been aware of the incorrect labor rates and prevented overcharges prior to our evaluation if the periodic invoice review had been completed on time. Therefore, the EPA does not know if it overpaid for services. As of the date of this report, the invoice reviews for the base year were still unresolved.

COs Did Not Perform Required Performance Evaluation

The EPA COs did not complete the required contractor performance evaluation in CPARS for the Attain task order’s base year that ended on August 27, 2019. The Federal Acquisition Regulation and the EPA Acquisition Guide require past performance evaluations to be prepared at least annually and submitted in CPARS.

We noted that multiple COs managed the task order during the base year but none of them prepared the required contract transition checklist and transition memorandum to document the status of the CPARS evaluation and the contractor’s performance before transitioning the task order to the next CO.

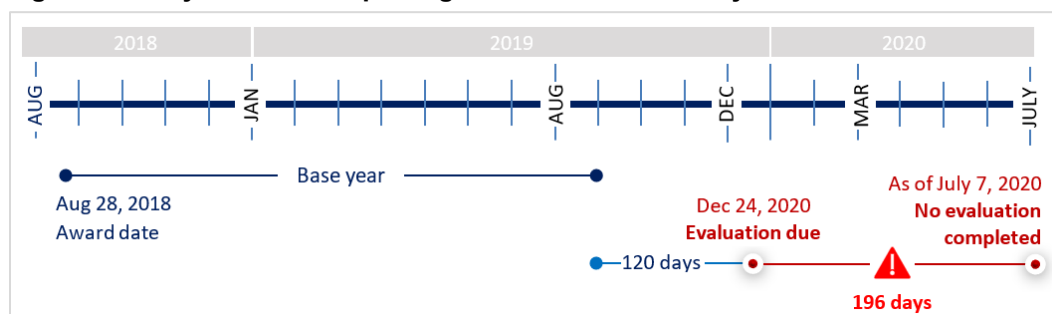
One CO stated that the procedures do not require a CO to complete CPARS evaluations prior to transferring the contract to the next CO. Although the procedures do not mandate completing the evaluation, the procedures require the CO to complete the checklist and include it in the contract file. The checklist includes a line item on the status of the CPARS evaluation and an area to include notes or instructions to inform the next CO of necessary actions to take. The EPA has not established a process to alert contract management personnel when the required annual evaluation has not been initiated in CPARS.

Office of Acquisition Solutions’ Workload Realignment Contract File Transition Procedures require a contract transition checklist to be completed by the CO when transferring contract files.

EPA Acquisition Guide section 42.15.1.5.1(e)(4) requires the CO to include a transition memorandum summarizing the contractor’s performance when transferring a contract to another CO in the official contract file.

It is incumbent upon contract management to ensure that COs are aware of their responsibilities to complete the required contract transition documents and have a process in place to ensure contractor performance evaluations are completed in a timely manner. As a result, as of July 7, 2020, the noted contractor performance evaluation had not been completed and was overdue by 196 days (Figure 2).

Figure 2: Delayed CPARS reporting for task order’s base year



Source: OIG analysis. (EPA OIG graphic)

Conclusions

When the CO does not periodically monitor the COR’s invoice reviews, the EPA does not have reasonable assurance that invoiced costs were properly approved for payments to prevent fraud, waste, and abuse. Similarly, when contractor performance evaluations are not conducted, the EPA lacks the information to facilitate the Agency’s decisions to invest taxpayer dollars in contractual services and products that add value to the Agency’s environmental mission and goals.

Recommendations

We recommend that the assistant administrator for Mission Support:

1. Develop and implement internal controls to alert the Office of Acquisition Solutions management, contracting officers' supervisors, and regional acquisition managers when contracting officers have not conducted the required invoice review in accordance with EPA Acquisition Guide 32.9.1.5(b)(4) and Office of Acquisition Management's *Invoice Review & Approval Desk Guide*.
2. Require the EPA's contracting officer, in coordination with the contracting officer's representative, to review all invoices for Contract No. GS-35F-0534W, Task Order No. 68HE0H18F1516, commencing with the base year to validate labor rates, billed costs, and recoup any overpayments from the contractor.
3. Develop and implement internal controls to alert Office of Acquisition Solutions management, contracting officers' supervisors, and regional acquisition managers when contractor performance evaluations have not been initiated in the Contractor Performance Assessment Reporting System within the required time frame.
4. Issue a memorandum to remind Office of Acquisition Solutions contracting officers, contracting officers' supervisors, and regional acquisition managers to complete the EPA's contract transition checklist and transition memorandum when transferring task orders, including contracts between contracting officers.
5. Require the contracting officer for Task Order No. 68HE0H18F1516, under Contract No. GS-35F-0534W, to prepare and submit the required performance evaluations in the Contractor Performance Assessment Reporting System for the base year and all option years, if exercised by the EPA, as required by federal directives.

Agency Response and OIG Assessment

The Agency concurred with all the recommendations and provided acceptable planned corrective actions and estimated milestone dates. We consider Recommendations 1, 2, 4, and 5 resolved with corrective actions pending. Recommendation 3 is completed as the Office of Mission Support provided documentation of completed corrective actions. We revised the language in Recommendations 1, 3, and 4 to include the COs' supervisors and regional acquisition managers. The Agency concurred with the revisions. The Agency's response to our draft report is in Appendix A.

Status of Recommendations and Potential Monetary Benefits

RECOMMENDATIONS

Rec. No.	Page No.	Subject	Status ¹	Action Official	Planned Completion Date	Potential Monetary Benefits (in \$000s)
1	8	Develop and implement internal controls to alert the Office of Acquisition Solutions management, contracting officers' supervisors, and regional acquisition managers when contracting officers have not conducted the required invoice review in accordance with EPA Acquisition Guide 32.9.1.5(b)(4) and Office of Acquisition Management's <i>Invoice Review & Approval Desk Guide</i> .	R	Assistant Administrator for Mission Support	1/30/21	
2	8	Require the EPA's contracting officer, in coordination with the contracting officer's representative, to review all invoices for Contract No. GS-35F-0534W, Task Order No. 68HE0H18F1516, commencing with the base year to validate labor rates, billed costs, and recoup any overpayments from the contractor.	R	Assistant Administrator for Mission Support	1/30/21	
3	8	Develop and implement internal controls to alert Office of Acquisition Solutions management, contracting officers' supervisors, and regional acquisition managers when contractor performance evaluations have not been initiated in the Contractor Performance Assessment Reporting System within the required time frame.	C	Assistant Administrator for Mission Support	9/30/20	
4	8	Issue a memorandum to remind Office of Acquisition Solutions contracting officers, contracting officers' supervisors, and regional acquisition managers to complete the EPA's contract transition checklist and transition memorandum when transferring task orders, including contracts between contracting officers.	R	Assistant Administrator for Mission Support	11/30/20	
5	8	Require the contracting officer for Task Order No. 68HE0H18F1516, under Contract No. GS-35F-0534W, to prepare and submit the required performance evaluations in the Contractor Performance Assessment Reporting System for the base year and all option years, if exercised by the EPA, as required by federal directives.	R	Assistant Administrator for Mission Support	1/30/21	

¹ C = Corrective action completed.

R = Recommendation resolved with corrective action pending.

U = Recommendation unresolved with resolution efforts in progress.

Agency Response to Draft Report



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

September 29, 2020

OFFICE OF MISSION SUPPORT

MEMORANDUM

SUBJECT: Response to Office of Inspector General Draft Report Project No. OA&E-FY20- 0107, "*EPA Needs to Improve Oversight of Invoice Reviews and Contractor Performance Evaluation*," dated September 2, 2020

FROM: Donna J. Vizian, Principal Deputy Assistant Administrator **Donna Vizian,**

TO: Rudy Brevard, Director
Information Resources Management Directorate
Office of Audit and Evaluation
Office of Inspector General

Digitally signed by Vizian,
Donna
Date: 2020.09.30
10:22:54 -04'00'

Thank you for the opportunity to respond to the issues and recommendations in the subject audit report. The Office of Mission Support is providing high-level intended corrective actions and estimated completion dates for each recommendation in the report.

AGENCY'S OVERALL POSITION

The agency concurs with the recommendations of this report and has included a summary response with high-level corrective actions and estimated completion dates in the table below.

OMS RESPONSE TO REPORT RECOMMENDATIONS

No.	Recommendation	High-Level Intended Corrective Actions	Estimated Completion Date
1	<p>Develop and implement internal controls to alert the Office of Acquisition Solutions management when contracting officers have not conducted the required invoice review in accordance with EPA Acquisition Guide 32.9.1.5(b)(4) and Office of Acquisition Management Invoice Review & Approval Desk Guide.</p>	<p>OMS concurs with the recommendation to develop and implement internal controls to alert the Office of Acquisition Solutions management when contracting officers have not conducted the required invoice review in accordance with EPA Acquisition Guide 32.9.1.5(b)(4) and Office of Acquisition Management Invoice Review & Approval Desk Guide.</p> <p>The Office of Acquisition Solutions (OAS) will send out a communication to operational OAS division directors and regional acquisition managers to strengthen each acquisition office’s emphasis on contract management and administration. Procedural enhancements should include implementation of a calendar alert or similar mechanism to help assure management’s awareness of the status of key administrative milestones on active contracts under its purview, particularly, the completion and documentation of the contracting officers’ periodic monitoring of contracting officers’ representatives invoice approving official duties.</p> <p>Furthermore, OAS will utilize its existing primary internal control mechanism, OAS’ Balance Scorecard, Acquisition System Performance Measurement and Management Program Guide, Part 6 - Contract Management Assessment Program, to require contract administration and oversight enhancements to Internal Control Plans including the implementation of key milestones calendar alert as described above. OAS will also require in the submission of the annual assessment report for a minimum duration of the next two calendar years, the specific reporting of COs’ periodic invoice review completion as a special interest item.</p>	January 30, 2021

No.	Recommendation	High-Level Intended Corrective Actions	Estimated Completion Date
2	<p>Require the EPA’s contracting officer, in coordination with the contracting officer’s representative, to review all invoices for Contract No. GS-35F-0534W, Task Order No. 68HE0H18F1516, commencing with the base year to validate labor rates, billed costs, and recoup any overpayments from the contractor.</p>	<p>OMS concurs with the recommendation to require the EPA’s CO, in coordination with the COR, to review all invoices for Contract No. GS-35F-0534W, Task Order No. 68HE0H18F1516, commencing with the base year to validate labor rates, billed costs, and recoup any overpayments from the contractor.</p>	<p>January 30, 2021</p>
3	<p>Develop and implement internal controls to alert Office of Acquisition Solutions management when contractor performance evaluations have not been initiated in the Contractor Performance Assessment Reporting System within the required time frame.</p>	<p>OMS concurs with the recommendation to develop and implement internal controls to alert OAS management when contractor performance evaluations have not been initiated in the Contractor Performance Assessment Reporting System within the required time frame.</p> <p>The Policy, Training and Oversight Division in OAS currently has in place an assigned point of contact who provides OAS acquisition offices a monthly status of their respective CPARS reporting. The POC ensures that managers and division directors are provided with said reports to alert them on the status of performance evaluations completion for procurement actions that exceed the simplified acquisition threshold.</p> <p>In addition, to further assist the acquisition community, OAS/PTOD has posted training material on the Knowledge Management SharePoint site: https://usepa.sharepoint.com/sites/OARM_Community/oam.kms/Toolkits/CPARS.aspx.</p> <p>The Toolkit was developed to consolidate into one location internal training material related to CPARS and CPARS reporting and lists CPARS POCs.</p>	<p>September 30, 2020</p>

No.	Recommendation	High-Level Intended Corrective Actions	Estimated Completion Date
4	Issue a memo to remind Office of Acquisition Solutions contracting officers to complete the EPA's contract transition checklist and transition memo when transferring task orders, including contracts between contracting officers.	OMS concurs with the recommendation to issue a memo to remind OAS COs to complete the EPA's contract transition checklist and transition memo when transferring task orders, including contracts between COs.	November 30, 2020
5	Require the contracting officer for Task Order No. 68HE0H18F1516 under Contract No. GS-35F-0534W to prepare and submit the required performance evaluations in the Contractor Performance Assessment Reporting System for the base year and all option years, if exercised by the EPA, as required by federal directives.	OMS concurs with the recommendation to require the CO for Task Order No. 68HE0H18F1516 under Contract No. GS-35F-0534W to prepare and submit the required performance evaluations in the Contractor Performance Assessment Reporting System for the base year and all option years, if exercised by the EPA, as required by federal directives.	January 30, 2021

If you have questions, please have your staff contact Mitchell Hauser, audit follow-up coordinator, Administrative Operations Division, at (202) 564-7636 or hauser.mitchell@epa.gov.

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