

DEPARTMENT OF HOMELAND SECURITY
Office of Inspector General

**Acquisition Workforce Training
and Qualifications**



OIG-08-56

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Homeland Security

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Preface

The Department of Homeland Security (DHS) Office of Inspector General (OIG) was established by the Homeland Security Act of 2002 (*Public Law 107-296*) by amendment to the Inspector General Act of 1978. This is one of a series of audit, inspection, and special reports prepared as part of our oversight responsibilities to promote economy, efficiency, and effectiveness within the department.

This report addresses the strengths and weaknesses of the Department of Homeland Security's oversight of acquisition workforce training and qualifications. We reviewed relevant policies and procedures, files, and applicable documents, and interviewed employees and officials.

The recommendations herein have been developed to the best knowledge available to our office and have been discussed in draft with those responsible for implementation. It is our hope that this report will result in more effective, efficient, and economical operations. We express our appreciation to all of those who contributed to the preparation of this report.

A handwritten signature in black ink that reads "Richard L. Skinner".

Richard L. Skinner
Inspector General

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Abbreviations

ACMIS	Acquisition Career Management Information System
AWF	DHS Acquisition Workforce Development Office within the Office of the Chief Procurement Officer
CBP	U.S. Customs and Border Protection
CO	Contracting Officer
COTR	Contracting Officer's Technical Representative
DHS	Department of Homeland Security
FAC-C	Federal Acquisition Certification in Contracting
FAC-P/PM	Federal Acquisition Certification for Program and Project Managers
OMB	Office of Management and Budget
PM	Program Manager
TSA	Transportation Security Administration

OIG

***Department of Homeland Security
Office of Inspector General***

Executive Summary

This report addresses the Department of Homeland Security's acquisition management challenges for ensuring that contracting officers, program managers, and contracting officer's technical representatives, herein referred to as acquisition personnel, meet the training and qualifications requirements for the size and complexity of the acquisitions to which they are assigned.

Federal policy requires each agency to collect, maintain, and utilize information to ensure effective management of the acquisition workforce. However, the Department of Homeland Security, U.S. Coast Guard, Transportation Security Administration, and U.S. Customs and Border Protection do not have complete, reliable information and related supporting documentation about their acquisition personnel and their assignments. Without such information, the Department of Homeland Security has no assurance that qualified staff are managing its acquisitions.

Moreover, several management directives relate to the acquisition workforce and the training and qualifications they need to manage major acquisitions. Some of these directives do not reflect current federal policy and are inconsistent with each other, creating confusion about which acquisitions require which levels of acquisition workforce certification.

We are making 3 recommendations to improve the department's ability to manage its acquisition workforce. Management generally concurred with our recommendations and we consider them resolved.

Background

With DHS spending about 39% of its budget annually through contracts, a high-performing acquisition workforce is fundamental to DHS' ability to accomplish its missions. For example, skilled program managers are critical in developing accurate government requirements, defining measurable performance standards, and managing contractor activities to ensure that intended outcomes are achieved. DHS' *Acquisition Oversight Program Guidebook* further emphasizes this connection.

“A good human capital management approach ensures that an agency has the right staff, in the right number, with the right skills, in the right places, to accomplish its mission effectively. This approach requires that an agency devote adequate resources to provide its acquisition workforce with the training and knowledge necessary to perform their jobs. It also requires long-range planning, including succession planning, to ensure the workforce has the necessary skills and qualifications to perform the acquisition function into the future.”

The *National Defense Authorization Act for Fiscal Year 1996* requires agencies to manage effectively and uniformly their acquisition workforces, including accession, education, training, career development, and performance incentives. The Office of Management and Budget (OMB) refined this requirement “to establish the government-wide framework for creating a federal acquisition workforce with the skills necessary to deliver best value supplies and services, find the best business solutions, and provide strategic business advice to accomplish agency missions.”¹

The OMB framework, formalized as the federal acquisition certification in contracting (FAC-C) and the federal acquisition certification for program and project managers (FAC-P/PM), specifies the education, training, and experience necessary to achieve three certification levels: I, II, or III for FAC-C and entry level/apprentice, mid-level/j journeyman, and senior level/expert for FAC-P/PM. The higher the certification level an individual

¹ OMB, *Developing and Managing the Acquisition Workforce*, Policy Letter 05-01, April 15, 2005; The *Federal Acquisition Certification in Contracting Program*, January 20, 2006; *The Federal Acquisition Certification for Program and Project Managers*, April 25, 2007.

attains, the larger the contract or program the individual can manage. For example, a DHS contracting officer must have a level III certification to sign procurement actions with total contract costs of more than \$25 million, including options, award fees, and total potential contract ceilings. In contrast, a contracting officer with a level I certification can sign procurement actions up to the simplified acquisition threshold, which is currently \$100,000. Table 1 shows another example of the distinctions between FAC-P/PM certification levels. Each certified individual must meet the previous level certification requirements before becoming eligible for a higher certification level.

Table 1: Program/Project Manager Certification Levels and Roles and Responsibilities	
<i>Certification</i>	<i>Roles and Responsibilities</i>
Entry Level / Apprentice	Perform as a project team member and manage low risk and relatively simple projects or manage more complex projects under direct supervision of a more experienced manager.
Mid-Level / Journeyman	Manage projects or program segments of low to moderate risks with little or no supervision.
Senior Level / Expert	Manage and evaluate moderate to high-risk programs that require significant acquisition investment and agency knowledge and experience.

Source: OMB, *The Federal Acquisition Certification for Program and Project Managers*, April 25, 2007.

The FAC-P/PM is not mandatory for all program managers, defined in the applicable DHS management directive as “the agency customer uniquely empowered to make final scope of work, capital investment, and performance acceptability decisions, and who is responsible for accomplishing program objectives . . . through the acquisition of . . . in-house, contract, or reimbursable support resources.” However, program managers assigned to major acquisitions must be certified at the senior level, unless an authorized official waives requirements in writing, on a case-by-case basis.²

According to FAC-P/PM, to maintain a valid certification, each individual must earn at least 80 continuous learning points every

² OMB defines major acquisitions, in part, as “a system or project requiring special management attention because of its importance to the mission or function of the agency” (OMB, *Planning, Budgeting, Acquisition, and Management of Capital Assets*, Circular No. A-11, Part 7, July 2007). Agencies have discretion to expand the definition. DHS guidance is unclear on this point, as discussed in this report.

2 years. Individuals earn points for training activities, such as teaching, self-directed study, and mentoring; courses completed to achieve higher certification; professional activities, such as attending, speaking, or presenting at professional seminars, publishing, and attending workshops; or educational activities, such as formal training and academic programs. FAC-P/PMs also earn points for developmental or rotational assignments.

Results of Audit

DHS, Coast Guard, TSA, and CBP do not have complete, reliable information and related supporting documentation about their contracting officers, program managers, and COTRs and their assignments. Without such information, DHS has no assurance that qualified staff are managing its acquisitions. Moreover, some management directives related to the acquisition workforce do not reflect current federal policy and are inconsistent with each other, creating confusion about which acquisitions require which levels of acquisition workforce certification. Some components are taking steps to improve oversight of their contracting officers', program managers', and COTRs' training and qualifications. When fully implemented, these initiatives should improve DHS' compliance with applicable requirements and its ability to manage efficiently its major acquisition workload.

DHS and Component Databases

Federal policy requires each executive agency to collect, maintain, and utilize information to ensure effective management of the acquisition workforce.³ DHS and its components need complete, accurate, and reliable data on its contracting officers, program managers, and COTRs to ensure that the appropriate number and mix of certified acquisition personnel are overseeing DHS' numerous mission-critical acquisitions. Moreover, DHS and its components also need accurate data so they can manage the workloads and training of their acquisition workforce.

DHS and its components maintain databases of information on their contracting officers, program managers, and COTRs. Based on the purpose of the DHS Acquisition Workforce Development Office (DHS AWF) database, it should contain the same total number and same individual names as the 3 component databases.

³ OMB, *Developing and Managing the Acquisition Workforce*, Policy Letter 05-01, April 15, 2005.

Instead, there were large differences in the number and names of acquisition personnel listed in the DHS AWF and component databases, as detailed in the tables below.⁴

The DHS AWF database contained 1,506 names of contracting officers, program managers, and COTRs for the Coast Guard, TSA, and CBP. By comparison, component databases contained 2,136 names, 42% more than the DHS AWF database.

1,322 of the 1,506 names (88%) in the DHS AWF database appeared in the component databases. However, the other 184 names (12%) in the DHS AWF did not appear in the component databases. In addition, 814 names (38%) in the component databases were not in the DHS AWF database.

Table 2: Database Comparison

Names	DHS AWF	Components
Listed in Both	1,322	1,322
Unique	184	814
Total	1,506	2,136

Source: OIG analysis of agency data.

We analyzed these results by acquisition role and component (Appendix C). Data on program managers had the highest match rate, with 90% overlap between the DHS AWF database and the components. The average match rate for contracting officers was 85% and 88% for CBP and TSA COTRs. By component, CBP had the highest match rate with the DHS AWF database at 91%. By contrast, Coast Guard had 82% and TSA had 87%.

We also compared the databases to the acquisition personnel assigned to the contracts we selected for the audit. The DHS components identified for us the acquisition personnel assigned to each contract during our review time frame, January 2006 to April 2007. We then checked whether the names were in the component databases. The 3 component databases together contained between 64% and 75% of the assigned personnel (Table 3). For example, the Coast Guard database contained 20 names of the 35 COTRs (57%) that Coast Guard officials told us were working on the contracts we selected. The TSA database contained 8 names of the 12 contracting officers (67%) TSA officials told us were working on the contracts we selected. For each component reviewed, at least 1 individual assigned to the contract was not in the database.

⁴ We excluded Coast Guard COTRs from our analysis due to data compatibility problems.

Table 3: Personnel Assigned to Selected Contracts Compared to Component Databases			
<i>Component</i>	<i>Contracting Officers</i>	<i>Program Managers</i>	<i>COTRs</i>
<i>Component Coast Guard, CBP, and TSA</i>			
Component Databases	50	9	46
OIG Selected Contracts	66	14	66
Match Rate	76%	64%	70%
<i>Coast Guard</i>			
Component Databases	28	1	20
OIG Selected Contracts	38	2	35
Match Rate	74%	50%	57%
<i>CBP</i>			
Component Databases	14	3	13
OIG Selected Contracts	16	7	16
Match Rate	88%	43%	81%
<i>TSA</i>			
Component Databases	8	5	13
OIG Selected Contracts	12	5	15
Match Rate	67%	100%	87%
Source: OIG analysis of agency data.			

These discrepancies indicate that DHS and the 3 components do not have effective internal controls to ensure that they maintain complete and reliable data on their acquisition workforce. DHS is likely not complying with federal policies that require each executive agency to collect, maintain, and utilize information to ensure effective management of the acquisition workforce. At the same time, DHS and the 3 components probably do not have all the information they need, such as a current inventory of certified personnel and the acquisitions to which they are assigned, for sound acquisition workforce management decisions.

Component Supporting Documentation

Federal policy and DHS management directives for acquisition workforce certification require agencies to maintain supporting

documentation for the certification process.⁵ For the most part, the acquisition personnel files that we reviewed did not have supporting documentation, such as applications, DHS certifications, training certificates, transcripts, and waivers. None of the components had complete training, warrant, and certification files for their contracting officers, program managers, and COTRs readily available.

Coast Guard: Of the 75 Coast Guard contracting officers', program managers', and COTRs' files we reviewed, 32 files (43%) had no documentation showing compliance with required basic skills training and 54 files (72%) had no evidence of skills currency (Table 4). Further, 13 of 35 COTR files (37%) had no evidence of procurement ethics training, a requirement that does not apply to contracting officers and program managers.

Supporting Documentation	Files Reviewed That Did Not Contain Sufficient Evidence			
	Total (Percent of 75 Total)	Contracting Officers (Percent of 38 COs)	Program Managers (Percent of 2 PMs)	COTRs (Percent of 35 COTRs)
DHS Certification	16 (21%)	2 (5%)	1 (50%)	13 (37%)
Skills Currency	54 (72%)	24 (63%)	2 (100%)	28 (80%)
Basic Skills Training	32 (43%)	19 (50%)	2 (100%)	12 (34%)
Application for DHS Certification	41 (55%)	30 (79%)	2 (100%)	10 (29%)
Procurement Ethics Training	n.a.	n.a.	n.a.	13 (37%)
n.a. Not applicable to this role.				
Source: OIG analysis of Coast Guard files.				

⁵ DHS, *Contracting Officer Warrant Program*, Management Directive 0740.2, March 12, 2004; COTR Certification, Appointment & Responsibilities, Management Directive 0780.1, December 20, 2004; Contracting Professional (GS-1102) Career Information, Management Directive 0781.1; February 22, 2005; and Acquisition Certification Requirements for Program Manager, Management Directive 0782, May 26, 2004; OMB, *Developing and Managing the Acquisition Workforce*, Policy Letter 05-01, April 15, 2005.

We also examined the expiration dates of the contracting officer's certifications. When a contracting officer's certification expires, the contracting officer no longer meets required qualifications. For the 36 contracting officers whose files contained a DHS certification, 11 (31%) had expired as of July 31, 2007. The lapsed DHS certifications we reviewed had been expired for about 6 months, on average, with the longest expired for 22 months.

Only those employees with specific contracting officer authority known as a *warrant* may execute contracts on behalf of DHS. Coast Guard files we reviewed for active contracts contained expired warrants. Documentation the Coast Guard provided us indicated that 13% of the contracting officers assigned to contracts in our audit sample might be working with lapsed warrants. Compared to August 31, 2007, one contracting officer's warrant had been expired for 20 months, 2 other contracting officers' warrants had been expired for 5 months, and 2 others' warrants had been expired for 3 months.

As of October 15, 2007, Coast Guard had not provided us with all evidence of certification or warrant renewals or evidence of transferring these individuals' responsibilities. Moreover, Coast Guard did not fully explain why the warrants have been allowed to expire or have not been renewed. Coast Guard officials told us that supervisors are responsible for ensuring that the contracting officers working for them have current warrants. While this is a reasonable first level of oversight, agencies need additional internal control measures to ensure that the supervisors fulfill this responsibility.

TSA: The TSA files we reviewed were more organized and tended to contain more information than the Coast Guard files. Nevertheless, some files did not comply with applicable management directives and did not have supporting documentation to verify certification, skills currency, and basic skills training (Table 5). For example, 3 files of the 32 files (9%) we reviewed did not contain DHS certifications; 19 files (59%) did not contain evidence that the individual complied with skills currency requirements; 7 files (22%) did not indicate that the individual completed basic skills training (core courses).

Table 5: Supporting Documentation for TSA Acquisition Personnel Assigned to Sample Contracts between January 2006 and April 2007				
<i>Supporting Documentation</i>	<i>Files Reviewed That Did Not Contain Sufficient Evidence</i>			
	<i>Total</i> (Percent of 32 Total)	<i>Contracting Officers</i> (Percent of 12 COs)	<i>Program Managers</i> (Percent of 5 PMs)	<i>COTRs</i> (Percent of 15 COTRs)
DHS Certification	3 (9%)	0 (0%)	0 (0%)	3 (20%)
Skills Currency	19 (59%)	6 (50%)	2 (40%)	11 (73%)
Basic Skills Training	7 (22%)	4 (33%)	2 (40%)	1 (7%)
Application for DHS Certification	5 (16%)	2 (17%)	0 (0%)	3 (20%)
Procurement Ethics Training	n.a.	n.a.	n.a.	7 (47%)
n.a. Not applicable to this role.				
Source: OIG analysis of TSA files.				

CBP: CBP was in the process of gathering additional information from its human resources department when we discontinued our audit work. Consequently, our analysis of CBP was limited. We reviewed the documentation CBP provided us initially and determined that some files did not contain certifications or contained expired certifications; many of the files did not contain evidence that the individuals completed ethics training (Table 6). For example, 12 of 40 personnel (30%) had no documentation of their DHS certifications in their files.

Table 6: Supporting Documentation for CBP Acquisition Personnel Assigned to Sample Contracts between January 2006 and April 2007				
<i>Supporting Documentation</i>	<i>Files Reviewed That Did Not Contain Sufficient Evidence</i>			
	<i>Total</i> (Percent of 40 Total)	<i>Contracting Officers</i> (Percent of 17 COs)	<i>Program Managers</i> (Percent of 7 PMs)	<i>COTRs</i> (Percent of 16 COTRs)
DHS Certification	10 (25%)	0 (0%)	6 (86%)	4 (25%)
Procurement Ethics Training	n.a.	n.a.	n.a.	6 (38%)
n.a. Not applicable to this role.				
Source: OIG analysis of CBP files.				

Government-wide Acquisition Career Management Information System

By July 1, 2007, all civilian agencies were required to maintain complete and current acquisition workforce certification records in the Acquisition Career Management Information System (ACMIS).⁶ DHS did not meet the deadline. DHS planned to populate its own learning management system, DHScovery, and enable it to interface with ACMIS. Schedule problems and technical issues prevented implementation of this plan. DHS delayed entering its data into ACMIS because it wanted to eliminate entry of certification and training information into multiple systems, according to the DHS official we interviewed.

On June 28, 2007, the DHS Chief Procurement Officer notified the Office of Management and Budget that DHS would not meet the July 1, 2007, deadline and that DHS suspended its effort to integrate DHScovery and ACMIS. DHS estimated it would finish entering the requisite data into ACMIS by March 21, 2008. In April 2008, the responsible DHS official told us that the department did not meet the estimate. System problems and transition to a new support contractor delayed data entry.

Not using ACMIS hindered the Federal Acquisition Institute's ability to provide training curriculum support and oversight of the federal acquisition certification programs. The Federal Acquisition Institute is responsible for reviews of agency compliance with certification standards and providing enough on-line and classroom training for contracting officers, program managers, and COTRs government-wide.

DHS Management Directives

Several DHS management directives apply to such acquisition personnel as contracting officers, program managers, and COTRs. Some directives were not revised timely to reflect current federal requirements; others did not establish necessary policies; and others were inconsistent with one another. Consequently, their usefulness to the affected offices and staff was limited.

OMB issued the certification program for contracting officers in January 2006; DHS did not issue an interim management directive

⁶ OMB, *Developing and Managing the Acquisition Workforce*, Policy Letter 05-01, April 15, 2005.

to reflect the changes until April 2007, more than one year later. DHS officials told us that the differences between DHS management directives and FAC/C were not significant, so updating the directives was not urgent.

OMB issued the new FAC-P/PM program requirements in April 2007; as of October 2007, DHS had not revised its program management directive to reflect the new requirements. Significant differences exist between the FAC-P/PM program and the DHS program management directive. For example, the FAC-P/PM program requires entry level/apprentice certificate holders to have a minimum of 24 hours in earned value management; the DHS program management directive does not require any training in earned value management for level I certificate holders. Furthermore, some components have delayed implementing the new federal certification requirements because DHS delayed revising an existing management directive or issuing a new directive. DHS officials told us they planned to issue a revised directive by the end of calendar year 2007, but had not done so as of April 2008.

DHS has not established policy on the development, selection, assignment, and management of program managers. According to the existing management directive, DHS will issue such guidance in its forthcoming acquisition workforce development program manual.⁷ Until then, components are directed to use discretion in developing procedures for selection, assignment, and management of program managers.

The absence of up-to-date guidance creates a challenge for DHS components to track program manager selections, assignments, skills currency, and certifications, and thereby ensure that only qualified employees have significant acquisition responsibilities. Some components have multiple, geographically dispersed program offices, increasing the complexity of tracking and managing program managers. According to one DHS official, some program offices cannot identify their assigned program managers.

DHS does not follow its program manager management directive with regard to cost definitions and certification levels; instead, it uses the investment review process management directive.⁸ The

⁷ DHS, *Acquisition Certification Requirements for Program Managers*, Management Directive 0782.

⁸ DHS, *Investment Review Process*, Management Directive 1400, May 2003.

investment review process management directive requires that a program manager for a single contract with contract costs exceeding \$50 million⁹ have a level III certification (senior level/expert in FAC-P/PM), the highest level with the most education, training, and experience. By contrast, the DHS program manager directive¹⁰ stipulates that the program manager of a non-information technology acquisition with program acquisition costs between \$50 million and \$100 million¹¹ must have a level II certification (mid-level/j journeyman in FAC-P/PM). The level II certification requires less education, training, and experience than the level III. Consequently, the inconsistencies in DHS directives might allow a level II program manager to be assigned to a larger acquisition than a level III program manager.

DHS and Component Initiatives

Some components are taking steps to improve oversight of their contracting officers', program managers', and COTRs' training and qualifications. When fully implemented, these initiatives should improve DHS' compliance with applicable requirements and its ability to manage efficiently its major acquisition workload. For example, TSA has a certification and management database that shows program managers' current certifications and assignments. A TSA official told us they periodically reconcile their program manager certification management database to the DHS AWF database. TSA is developing a COTR certification and management system and has established a COTR support office in TSA's Acquisition Office that will focus exclusively on COTR management and the certification program. Recently, Coast Guard implemented a contracting officer warrant management system, a system TSA uses, that will automate the warrant certification process. It will enforce DHS warrant guidelines, separation of duties, and internal controls. It will also generate reports on pending warrants and warrants by issuing authority. It will have a tickler feature to alert when warrants are about to expire and skills currency is due.

⁹ Contract cost, also known as total contract value, includes options, award terms, and total potential contract ceilings.

¹⁰ DHS, *Acquisition Certification Requirements for Program Manager*, Management Directive 0782.

¹¹ Program acquisition costs are program initiation, concept and technology development, capability development and demonstration, and production and deployment costs.

Conclusions

The absence of complete, accurate, and reliable data on contracting officers, program managers, and COTRs likely impedes DHS' effective management of its acquisition workforce. Moreover, not providing high-quality information to the Federal Acquisition Institute complicates planning for recruiting, hiring, training, and budgeting. Finally, DHS' untimely and inconsistent management directives add confusion to the already-complicated major acquisition process.

The capabilities of DHS' acquisition workforce will determine, to a great extent, whether major acquisitions fulfill DHS' urgent and complex mission needs. Contracting officers, program managers, and COTRs make critical decisions on a nearly daily basis that increase or decrease an acquisition's likelihood of success. DHS must devote adequate resources to ensure that it has "the right staff, in the right number, with the right skills, in the right places, to accomplish its mission effectively."¹²

Recommendations

We recommend that the Under Secretary for Management, together with component acquisition officials,

Recommendation #1: Develop policies, procedures, and practices to maintain and regularly reconcile an accurate, current, and reliable inventory of contracting officers, program managers, and COTRs and their assignments that fully complies with government-wide requirements.

Recommendation #2: Establish quality control policies, procedures, and practices to ensure that the requisite data are entered into ACMIS and agency officials have access to evidence that certified contracting officers, program managers, and COTRs meet education, training, and experience requirements.

Recommendation #3: Revise DHS acquisition workforce related management directives to resolve inconsistencies and to reflect current federal training and qualifications requirements for contracting officers, program managers, and contracting officer's technical representatives.

¹² DHS, *Acquisition Oversight Program Guidebook*, 0784 Publication, July 2005.

Management Comments and OIG Analysis

DHS did not fully concur with our findings, but generally concurred with our recommendations. DHS disagreed with our sampling methodology, asserting that it resulted in statistically insignificant samples. In addition, DHS maintained that differences between the components' databases and that of DHS AWF are due, in part, to the lag between data entry into their respective databases. DHS also commented that these differences are expected because the components' historical files contain more records than the DHS database that has existed for a few years. With respect to expired warrants, DHS stated that we did not prove contracting officers executed actions without proper authority.

With respect to our methodology, the components were unable to provide us lists of current acquisition workforce personnel by position, i.e., contracting officer, program manager, and COTR. Consequently, we focused on the areas that would create risk for DHS mission accomplishment, that is, large, recent contracts. We then audited the records for the personnel involved in those contracts. We relied on the components to identify the individuals assigned to our sample contracts. We did not verify the accuracy and completeness of these lists the components provided us.

The significant differences between the DHS and components' databases indicate that periodic reconciliations have not been conducted. While the data entry lag time might explain some differences, it is unlikely the cause of the large number of differences. In addition, we disagree with DHS' assertion that historical files account for the significant discrepancies. The components provided us lists of currently certified individuals that would reflect data that at most would be 4 years old, given the duration of a valid certification. With respect to expired warrants, it is up to the components to demonstrate that they have policies and procedures in place to ensure that only contracting officers with proper authority can execute contractual actions.

DHS concurred with our recommendations and has initiated or is planning actions to improve the tracking of acquisition personnel and documentation of their qualifications and assignments. These actions are responsive to our recommendations, and, when fully implemented, will likely improve the situation. We consider these recommendations resolved, but open, until DHS fully implements the corrective actions.

Appendix A

Purpose, Scope, and Methodology

Our audit objective was to determine the adequacy of internal controls to ensure compliance with applicable training and qualifications requirements for DHS' acquisition workforce.

Our audit scope included the DHS Acquisition Workforce Development Office (DHS AWF) within the Office of the Chief Procurement Officer, Coast Guard, TSA, and CBP. We analyzed policies and procedures, conducted interviews with knowledgeable officials, and reviewed relevant files. We reviewed DHS AWF and component workforce data and assessed internal controls over the certification process. We selected a judgmental sample of non-information technology contracts worth more than \$5 million. The DHS components identified for us the acquisition personnel assigned to each selected contract. We did not independently verify the accuracy and completeness of the lists of acquisition workforce personnel the components provided us.

We reviewed training, warrant, and certification records for the contracting officers, program managers, and contracting officer's technical representatives (COTRs) who worked on our selected sample contracts between January 2006 and April 2007. We evaluated the files based on the DHS management directives in effect at the time. We completed our file review for all active Coast Guard and TSA contracts with values, including options, of \$50 million or more. We also examined some CBP workforce files. We conducted our fieldwork for this audit between April 2007 and September 2007, under the authority of the Inspector General Act of 1978, as amended, and according to generally accepted government auditing standards.

Appendix B

Management Comments on the Draft Report

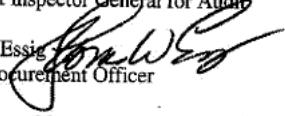
U.S. Department of Homeland
Security
Washington, DC 20528

JAN 31 2008



Homeland
Security

MEMORANDUM FOR: Anne L Richards
Assistant Inspector General for Audit

FROM: Thomas Essig
Chief Procurement Officer


SUBJECT: *Response to Management Advisory Concerning Acquisition Workforce Training and Qualifications*

This is our response to draft report, "Management Advisory Concerning Acquisition Workforce Training and qualifications." The first attachment provides our concurrence, in general, with the specific recommendations contained in the draft report and outlines our planned actions. While the focus of your review, namely the tracking of the acquisition workforce and documentation of their qualifications, is important, our recent efforts have focused on the following strategic initiatives with our limited resources: developing and launching the centralized acquisition intern program; centralizing acquisition recruitment efforts; centralizing acquisition training and development; partnering with other Federal Agencies such as the Federal Acquisition Institute and Defense Acquisition University on various workforce and training efforts; and identifying and implementing succession planning tools, such as direct hire authority and re-employed annuitants.

Additionally, we have significant concerns with the methodology utilized during your review. First, the use of Federal Procurement Data Systems, New Generation (FPDS-NG) to ascertain a statistically significant sample of assigned program managers is not possible since program managers are not assigned to contracts. Second, a sampling methodology was used although many of the samples were not statistically significant (e.g., for USCG, only 2 program manager files were reviewed out of about 60). Third, a pull from all databases represents a snapshot in time which can explain some variances found since there is a lag period between the Component and Headquarters entering data into their respective databases. Also, a person may be acting in the capacity of a Contracting Officer with warrant and appropriate certification but moves to a position not requiring such credentials. Signature authority is only relevant at the time of contract execution and your advisory provides no indication that individuals executed contractual actions without proper authority. Additionally, Components such as the Coast Guard have long maintained certification programs prior to becoming part of the Department. So, it is expected that their historical files show a greater number of records than a headquarters database that has been in existence for only a few years. Finally, some of the Components were not given an opportunity to reconcile some of the discrepancies in the databases.

The report inter-mingles the various certification programs and levels, which is confusing and could stand some clarification. For instance, the report discusses the Federal Acquisition Certification in Contracting (FAC-C), and then goes in depth to discuss the Federal Acquisition Certification in Project / Program Management (FAC-PPM), during which time DHS was issuing DHS PM certifications under Management Directive 0782, "Acquisition Certification Requirements for Program Manager."

I've also attached input we received from the USCG. Should you have any questions, my point of contact is Donna Jenkins, Director, Acquisition Workforce, at (202) 447-5257.

Attachments

Appendix B

Management Comments on the Draft Report

ACMIS Policy and Deployment Plan

As of 1 November 2007

Deployment Plan

A three phased deployment plan is proposed:

Phase I:

- All 1102s, 1105s, and Contracting Officers with warrants over the micro-purchase threshold;
- Program Managers assigned to Level I programs; and
- COTRs of contracts that support Level I programs

By November 9, 2007:

Must obtain a password and register in ACMIS. To complete this step go to www.acmis.gov. This step is essential in order for FAI's data migration initiative to be successful. Data from the OCPO access data base can only be migrated to ACMIS if a person is registered in the system.

Between November 16 and November 30, 2007:

For those individuals listed above that hold a DHS and/or federal acquisition certification, they must enter the system and validate the information that was migrated from the DHS Access database; correct any incorrect information; and enter all incomplete information following the guidance in the User Notes. Information expected to migrate from Access to ACMIS includes name, component, grade and series (if provided on the certification application), degree (for GS-1102s and PMs), CON training completed/completion date, and certification issued and date of issuance).

By November 30, 2007:

For individuals listed above that do not hold a DHS and/or federal certification (for example, some Program Managers, 1105s, and individuals with warrants under the simplified acquisition threshold), they must enter all required information into ACMIS (see attached User Notes for guidelines on entering information into ACMIS).

By December 15, 2007:

For those individuals listed above, Approving officials (see below for details on proposed Approving officials) must verify and acknowledge approval of the information in ACMIS.

Effective November 15, 2007:

Anyone seeking certification must enter their information into ACMIS before submitting their application and supporting documentation to the HCA (or designee). The Approving official shall verify and approve all information in ACMIS before submitting an application for certification to OCPO.

Phase II:

By December 15, 2007:

- All Program Managers of Level II and III programs and

NOTE: The implementation of ACMIS does not change documentation or routing requirements for acquisition certification. All records in ACMIS must be supported by the appropriate documentation as outlined in the applicable Management Directive for acquisition certification (or interim policy document for F/A-C certification). (Attachment 2)

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- All COTRs of Level II and III programs.

Must register in ACMIS, obtain a user name and password, and then log into the system and under the "Edit Acquisition Position and Responsibilities" check the workforce position(s) (e.g., PM, COTR) to which they belong.

By December 31, 2007:

For those individuals listed above that hold a DHS and/or federal acquisition certification, they must enter the system and validate the information that was migrated from the DHS Access database; correct any incorrect information; and enter all incomplete information following the guidance in the attached User Notes. Information expected to migrate from Access to ACMIS includes name, component, grade and series (if provided on the certification application), degree (for PMs), CON training completed/date completed, and certification issued and date issued).

By December 31, 2007:

For individuals listed above that do not have a DHS and/or federal acquisition certification, they must enter all required information into ACMIS (see User Notes for guidelines on entering information into ACMIS).

By January 15, 2007:

For those individuals listed above, Approving officials must verify and approve the information in ACMIS (see below for details on proposed Approving officials).

Phase III:

By January 15, 2008:

- All COTRs not previously identified;
- Individuals possessing a DHS "ordering official" certification; and
- Any individual possessing a DHS or federal acquisition certification (but **not** a member of the DHS acquisition workforce).

Must register in ACMIS, obtain a user name and password, and for employees performing as COTRs (not simply individuals seeking certification), they must log into the system and under the "Edit Acquisition Position and Responsibilities" check the COTR block.

By January 31, 2008:

For those individuals listed above that hold a DHS and/or federal acquisition certification, they must enter the system and validate the information that was migrated from the DHS Access database; correct any incorrect information; and enter all incomplete information following the guidance in the User Notes. Information expected to migrate from Access to ACMIS includes name, component, grade and series (if provided on the certification application), degree (for PMs), CON training completed/date completed, and certification issued and date issued).

By January 31, 2008:

For COTRs that do not hold a COTR certification, they must enter all required information into ACMIS (see User Notes for guidelines on entering information into ACMIS).

NOTE: The implementation of ACMIS does not change documentation or routing requirements for acquisition certification. All records in ACMIS must be supported by the appropriate documentation as outlined in the applicable Management Directive for acquisition certification (or interim policy document for FAC-C certification). (Attachment 2)

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By February 15, 2008:

For those individuals listed above, Approving officials (see below for details on proposed Approving officials) must verify and approve the information in ACMIS.

Approving Officials:

For quality control purposes, HCAs must designate an individual(s) to serve as the Approving official(s). Approving officials are responsible for verifying information in ACMIS as accurate and complete before forwarding the application package to OCPO. This designation shall be in writing and a copy of that designation shall be provided to OCPO, Acquisition Workforce.

NOTE: The implementation of ACMIS does not change documentation or routing requirements for acquisition certification. All records in ACMIS must be supported by the appropriate documentation as outlined in the applicable Management Directive for acquisition certification (or interim policy document for FAC-C certification). (Attachment 2)

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Proposed ACMIS Policy and Deployment Plan

As of January 23, 2008

Phase I:

- All 1102s, 1105s, and Contracting Officers with warrants over the micro-purchase threshold;
- Program Managers assigned to Level I programs; and
- COTRs of contracts that support Level 1 programs

By February 8, 2008:

All individuals listed above must obtain a password and register in ACMIS; to complete this step go to www.acmis.gov. They must thereafter enter the system and validate any information migrated from the DHS Access database, correct any incorrect information; and enter all incomplete information following the guidance in the User Notes.

By February 22, 2008:

For those individuals listed above, Approving officials (see below for details on proposed Approving officials) must verify and acknowledge approval of the information in ACMIS.

Phase II:

By February 29, 2008:

- All Program Managers of Level II and III programs and
- All COTRs of Level II and III programs.

All individuals listed above must obtain a password and register in ACMIS; to complete this step go to www.acmis.gov. They must thereafter enter the system and validate any information migrated from the DHS Access database, correct any incorrect information; and enter all incomplete information following the guidance in the User Notes.

By March 14, 2008:

For those individuals listed above, Approving officials must verify and approve the information in ACMIS (see below for details on proposed Approving officials).

Phase III:

By March 21, 2008:

- All COTRs not previously identified;
- Individuals possessing a DHS "ordering official" certification; and
- Any individual possessing a DHS or federal acquisition certification (but **not** a member of the DHS acquisition workforce).

All individuals listed above must obtain a password and register in ACMIS; to complete this step go to www.acmis.gov. They must thereafter enter the system and validate any information migrated from the DHS Access database, correct any incorrect information; and enter all incomplete information following the guidance in the User Notes.

NOTE: The implementation of ACMIS does not change documentation or routing requirements for acquisition certification. All records in ACMIS must be supported by the appropriate documentation as outlined in the applicable Management Directive for acquisition certification (or interim policy document for FAC-C certification). (Attachment 3)

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By April 4, 2008:

For those individuals listed above, Approving officials (see below for details on proposed Approving officials) must verify and approve the information in ACMIS.

Approving Officials:

For quality control purposes, HCAs must designate an individual(s) to serve as the Approving official(s). Approving officials are responsible for verifying information in ACMIS as accurate and complete before forwarding the application package to OCPO. This designation shall be in writing and a copy of that designation shall be provided to OCPO, Acquisition Workforce.

Effective November 15, 2007:

Anyone seeking certification must enter their information into ACMIS before submitting their application and supporting documentation to the HCA (or designee). The Approving official shall verify and approve all information in ACMIS before submitting an application for certification to OCPO.

NOTE: The implementation of ACMIS does not change documentation or routing requirements for acquisition certification. All records in ACMIS must be supported by the appropriate documentation as outlined in the applicable Management Directive for acquisition certification (or interim policy document for FAC-C certification). (Attachment 3)

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USCG DRAFT RESPONSE TO DHS IG MANAGEMENT ADVISORY

MEMORANDUM FOR: Thomas Essig
Chief Procurement Officer

FROM: Claire Grady
Head of the Contracting Activity, United States Coast Guard

SUBJ: U.S. Department of Homeland Security Office of Inspector General Draft Management Advisory Concerning Acquisitions Workforce Training and Qualifications.

Thank you for the opportunity to respond to the subject draft management advisory. The following are the U.S. Coast Guard's responses to each of the separate recommendations and clarifying remarks to specific statements in the narrative section of the draft management advisory.

Recommendations

1. *Develop policies, procedures, and practices to maintain and regularly reconcile an accurate, current, and reliable inventory of contracting officers, program managers, and COTRs and their assignments that fully complies with government-wide requirements.*

USCG Comments on Report Narrative: As previously discussed with the IG, the Coast Guard does not believe the DHS AWF database should contain the same number and same individual names as the three component databases. While it is difficult to comment on specific inconsistencies as there is limited insight into how the numbers were generated or what caused the dramatic change in the numbers from the earlier draft report, the Coast Guard would not expect the number of records in the two databases to perfectly correlate. Due to the fact that the data in our databases for contracting personnel and for contracting officer's technical representatives (COTRs) predates the DHS AWF database and contains legacy information, the number of records in our databases should exceed that of the DHS AWF. The Coast Guard database contains historical records for individuals no longer performing acquisition functions. During the transition to the DHS acquisition workforce standards, only individuals who have a current need to perform acquisition functions were submitted to the department. Another factor that would contribute to the discrepancy is the four to six week lag between when an acquisition certification is submitted by the Coast Guard and when it is approved and entered into the DHS AWF database. At any given point in time, particularly with the push to ensure our workforce is certified at the appropriate level, a substantial number of applications for certification are in process and would be reflected in the Coast Guard database, but not yet in the DHS AWF database.

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USCG Response: Concur. The USCG agrees that policies, procedures and practices must be in place to ensure that contracting officers, program managers and COTRs fully comply with government-wide requirements. The Coast Guard has made significant progress in this area including:

- In July 2007, the USCG implemented the Warrant Management System as the official inventory of authorized contracting officers. COCO ALERT 07-47, Implementation of Warrant Management System (WMS), announced the implementation of WMS, and established policy and procedures for processing a warrant, and record keeping. WMS is linked to the User Management System which ensures that a warrant is issued to a valid USCG employee.
- In May 2007, the USCG implemented the COTR Database to be the official inventory of authorized COTRs. Existing COTR appointment records (including training) are being migrated and reconciled in the system. An enhancement is currently being implemented to capture COTR contract assignments. In accordance with a Blueprint for Acquisition Reform action item, USCG will pilot the database on all COTRs in the Acquisition Directorate. The test will be completed by the end of second quarter, Fiscal Year 2008. The pilot will help identify any requirements gaps before rolling it out CG-wide.
- The USCG's Acquisition Directorate maintains an inventory of major systems program managers and has undertaken an aggressive program to get all major systems program managers certified at the appropriate level. Currently, 54% of positions requiring Program Manager Level III certification are staffed with personnel meeting the DHS requirement. CG is on track to meet 100% of DHS Level III certification requirements by the end of the fiscal year.

2. *Establish quality control policies, procedures, and practices to ensure that agency officials have access to evidence that certified contracting officers, program managers, and COTRs meet education, training, and experience requirements.*

USCG Comments on Report Narrative: As was previously discussed with the DHS IG, the audit sample covered a defined timeframe from January 2006 through April 2007, so it is to be expected that a review of the current status of the files would reveal that some of those contracting officer warrants may have since lapsed. What is relevant is whether the individual was warranted at the appropriate level at the time he or she executed a contractual action. Transfer to another component or agency, retirement, or reassignment to a position that no longer required a contracting officer's warrant would result in that individual's warrant not being renewed. There is no indication that any individuals continued to execute contractual actions without appropriate authority.

As was also discussed with the DHS IG, Coast Guard contracting professionals have been subject to certification standards and documentation requirements which have changed substantially over the years, particularly with respect to

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individuals who have occupied positions for a certain period of time and were "grandfathered in" and not necessarily required to comply with revised certification standards. With the advent of FAC-C, standards and documentation requirements have been clarified to allow for consistency across federal civilian agencies. However, those standards were implemented by DHS on April 16, 2007, only two weeks before the end of the audit sample period.

USCG Response: Concur

- Within the Coast Guard, the Chief of the Contracting Office is delegated responsibility for managing 1102 workload and warrants; the warranted/certified individual has personal responsibility for maintaining certification and skills currency. When warrants expire without being renewed, the COCO is responsible for assigning the individual duties that do not involve obligation of funds. Furthermore, as part of its oversight program, the USCG reviews warrants to ensure warrants are active and purchases are within procurement thresholds.
- To ensure contracting officers have valid warrants at the time of execution of a contract action, the USCG implemented the Warrant Management System in July 2007. It captures warrant thresholds, certification levels, expiration dates, and training. A system update planned for early spring 2008 will validate awards against purchase thresholds and/or commodities – thus prohibiting a contracting officer from making a purchase without a valid warrant. A future enhancement will notify contracting officers of impending requirements to complete skills currency training and renew warrants/certification.
- The USCG implemented the COTR Database in May 2007 to capture all COTR appointments. The database captures training, certification and expiration dates, and recertification dates. The database identifies individuals requiring skills currency within 90 days of their annual recertification date. The COTR Program Manager is in the process of developing a procedure to notify COTRs to complete skills currency training or have certification expire. In accordance with a Blueprint for Acquisition Reform action item, USCG will pilot notification procedures on all COTRs in the Acquisition Directorate by the end of second quarter, Fiscal Year 2008. Upon successful completion of the pilot, notification procedures will be rolled out CG-wide.
- The Coast Guard convenes an Acquisition Workforce Certification Board (AWCB) on a monthly basis to verify that applicants meet the DHS standards (experience, education, and training) established for certification in program management. Members of the Coast Guard AWCB certify that all Coast Guard applicants satisfy DHS standards in Management Directive #0782 "Acquisition Certifications for Program manager." Complete applications are forwarded to DHS for approval. The Coast Guard Office of Acquisition Workforce Management (CG-921) maintains a database of all workforce certifications and tracks annual skills currency completion for maintaining certification.

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3. Expedited completion of ACMIS data entry

USCG Response: Concur. The Coast Guard is pleased that civilian agencies will be provided a central repository to track qualifications, experience and training, but is concerned about the need for acquisition personnel to maintain duplicate records in overlapping systems and the reliance on manual entry of data. Varying standards for file maintenance and documentation since implementation of certification standards appear to have contributed significantly to the DHS IG findings that some of the USCG's certification records appeared to be inadequate. Upon successful migration of DHS workforce data into ACMIS, the USCG will promptly direct users to review and complete their records.

4. Promptly revise DHS acquisition workforce related management directives to resolve inconsistencies and to reflect current federal training and qualifications requirements for contracting officers, program managers, and contracting officer's technical representatives.

- The USCG is committed to promptly and completely implementing acquisition workforce related management directives issued by DHS.

Finally, the USCG has no concerns about publicly releasing any information in the report.

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DHS Response to the DHS Office of Inspector General Draft Management Advisory Concerning Acquisition Workforce Training and Qualifications

Recommendation 1: Develop policies, procedures, and practices to maintain and regularly reconcile an accurate, current and reliable inventory of contracting officers, program managers, and COTRs and their assignments that fully complies with the government-wide requirements.

DHS Reply: Concur with comment. The Office of the Chief Procurement Officer (OCPO) is proceeding with the following initiatives to achieve this result:

The Certification and Career Development Branch of the Acquisition Workforce is proceeding with the implementation of the Acquisition Career Management Information System (ACMIS). ACMIS will be the training and certification system of record for contracting specialists, program managers and contracting officer's technical representatives across the Department in accordance with the Office of Personnel Policy (OFPP) Letter 05-1.

Additionally, in tracking contracting officers, program managers, and contracting officer's technical representatives, OCPO is working closely with the Office of the Chief Human Capital Officer (OCHCO) to pilot the use of "acquisition coding" of billets. One of the problems with tracking acquisition professionals is that there is no existing personnel database that identifies whether an individual is within the acquisition workforce (the exception is that the 1102 series is used for contracting specialists and contracting officers, all of whom are in the acquisition workforce). The pilot currently being prepared for test utilizes two, alpha numeric, four digit fields in the national finance center database to "tag" a position description and billet as an acquisition position with specific certification requirements. Once the mechanics are proven to work, DHS will proceed in working with the Components and appropriate parties to identify and "tag" acquisition billets, allowing the tracking of assignments and comparing the incumbents' certification level to the required certification level. This will provide an additional internal control to keep track of those in the acquisition workforce.

Lastly, DHS is in the process of revising and reissuing Management Directive, 0003 – Acquisition Line of Business Integration and Management which will identify the need for a Component Acquisition Executive (CAE), this is in addition to Head of Contracting Activity position. Each major line of business or Component will assign a CAE who will be responsible for the overall acquisition process in their area with the exception of the contracting/procurement function. This single point of contact will be responsible for ensuring that all program managers, contracting officer's technical representatives and any other acquisition career field developed other than contracting will meet the established required minimum level of certification for the position they occupy.

For the purpose of reconciliation, DHS has implemented MD 0784, Acquisition Oversight Program which incorporates the review of the component's acquisition workforce during the on-site reviews. During such reviews, workforce data will be reconciled, using sampling when appropriate.

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Recommendation 2: Establish quality control policies, procedures, and practices to ensure that agency officials have access to evidence that certified contracting offers, program managers and COTRs meet education, training, and experience requirements.

DHS Reply: Concur with comment. OCPO is proceeding with the implementation of the Acquisition Career Management Information System (ACMIS). ACMIS will be the training and certification system of record for contracting specialists, program managers and contracting officer's technical representatives across the Department. ACMIS is designed to and will contain supporting evidence that individuals meet education, training, and experience requirements. Heads of Contracting Activities and Component Acquisition Executives, and their designated representatives, will be given access to their representative Components data.

Recommendation 3: Expediently complete ACMIS data entry.

DHS Reply: Concur. DHS is proceeding with the implementation of the Acquisition Career Management Information System (ACMIS). ACMIS will be the training and certification system of record for contracting specialists, program managers and contracting officer's technical representatives across the Department. The initial deployment plan dated November 2007 is attached (Attachment 2). Due to delays resulting from unsuccessful data migration efforts from DHS's current database to ACMIS, there is approximately a ten week delay. The estimate is that all 1102s, 1105s, and PMs and COTRs assigned to Level I programs will complete their data entry between February 5th and 10th (Attachment 3).

We note that the OMB mandate to use ACMIS increases the burden on all acquisition workforce personnel by having to manually enter historical data and current training completion data into both ACMIS and the Department's Learning Management System (LMS). The Office of Personnel Management's (OPM) mandate of the President's Management Agenda, e-Learning initiative is for each Department to transmit all training data to OPM's Enterprise Human Resources Integration (EHRI) data repository system. Since both systems plan to feed the EHRI system not only is duplicative entry a burden but it increases the possibility that acquisition personnel will end up with duplicative training records at OPM. Such duplicate entry significantly increases the likelihood of errors of the type that the OIG found in this review.

Recommendation 4: Promptly revise DHS acquisition workforce related management directives to resolve inconsistencies and to reflect current federal training and qualifications requirements for contracting officers, program managers, and contracting officer's technical representatives.

DHS Reply: Concur. Management Directive 064 – 04, Acquisition Professional Career Information, which establishes the overarching policies for acquisition certification is in the final coordination stage and should be signed within 90 days. Once approved, follow on instructions would be issued from the Office of the Chief Procurement Officer for each of the acquisition career field certification requirements. The follow-on instruction for contracting will comply with the OFPP Federal Acquisition Certification (FAC) guidelines for the contracting career field and DHS will issue FAC-C certifications. DHS intends to comply with the OFPP FAC guidelines for Program Managers and impose more stringent certification standards in order to

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more closely align with the Defense Acquisition Workforce Improvement Act (DAWIA) Level III requirements. As a result, we plan to issue DHS Program Manager certifications. The draft DHS PM certification requirements have already been socialized throughout the department and with the Federal Acquisition Institute. DHS is currently in the process of evaluating the FAC – Contracting Officer's Technical Representatives (COTR) policy issued November 26, 2007, and anticipates meeting the six month implementation requirement. Until such time, DHS will continue issuing the DHS COTR certifications.

Attachment 1

Appendix C

Acquisition Personnel Database Comparison, by Component

COAST GUARD, CBP, AND TSA COMBINED	Total		Contracting Officers		Program Managers		COTRs*	
	DHS AWF	Coast Guard, CBP and TSA	DHS AWF	Coast Guard, CBP, and TSA	DHS AWF	Coast Guard, CBP, and TSA	DHS AWF	CBP and TSA
Listed in Both	1,322	1,322	348	348	309	309	665	665
Unique	184	814	60	150	36	33	88	631
Total	1,506	2,136	408	498	345	342	753	1,296
COAST GUARD	DHS AWF	Coast Guard	DHS AWF	Coast Guard	DHS AWF	Coast Guard		
Listed in Both	266	266	218	218	48	48		
Unique	57	98	44	91	13	7		
Total	323	364	262	309	61	55		
CBP	DHS AWF	CBP	DHS AWF	CBP	DHS AWF	CBP	DHS AWF	CBP
Listed in Both	599	599	73	73	26	26	500	500
Unique	56	348	1	22	2	2	53	324
Total	655	947	74	95	28	28	553	824
TSA	DHS AWF	TSA	DHS AWF	TSA	DHS AWF	TSA	DHS AWF	TSA
Listed in Both	457	457	57	57	235	235	165	165
Unique	71	368	15	37	21	24	35	307
Total	528	825	72	94	256	259	200	472

* We excluded Coast Guard COTRs from our analysis due to data compatibility problems.

Source: OIG analysis of agency data.

Appendix D

Major Contributors to this Report

Rosalyn G. Millman, Director
Ruth Blevins, Audit Manager
Sharon Trodden, Auditor-in-Charge
Melissa Jones, Analyst
Andre Marseille, Analyst
Matthew Noll, Analyst

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