OFFICE OF THE SECRETARY

Enterprise Services Needs to Improve Upon Its Contract Management and Oversight of Accenture BPA No. DOCSS130116BU0004 and Subsequent Call Orders

OIG-22-009-A

WHAT WE FOUND

Overall, we found significant weaknesses in ES’ management and oversight of the Accenture BPA. Specifically, we found the following:

I. ES was not effective in enforcing performance requirements to ensure contract quality and timeliness standards were met and did not timely assess or adequately document contractor performance in the Contractor Performance Assessment Reporting System (CPARS).

II. ES contracting officers (COs) and the assigned contracting officer’s representatives (CORs) did not properly maintain invoices or supporting documentation to demonstrate that invoices were reviewed and work was performed prior to approving invoices for payment.

WHAT WE RECOMMEND

We recommend that the Deputy Secretary of Commerce ensure that the Enterprise Services Executive Director does the following:

1. Develop and implement procedures necessary for current and future contracts to reduce vendor PP&B processing errors to include, at a minimum, enforcing the contractual requirements outlined in the (1) service-level agreement on the timely resolution of incidents and service requests and assessing financial penalties for unsatisfactory vendor performance, and (2) the statement of work that require the vendor to provide qualified and trained staff to timely and adequately process PP&B.

2. Utilize an issue tracking system that accurately tracks and monitors service and support tickets issued in response to delays and errors with the processing of PP&B.

3. Revise the quality assurance surveillance plan (QASP) for current and future contracts to require documentation of performance for PP&B processing at the bureau/order level in order to provide a true depiction of vendor performance as well as develop quality metrics to track customer satisfaction.

4. Reevaluate the contractor appraisal process for call order 7 and assess and report on whether it allows contracting officials to capture an accurate portrayal of vendor performance.

5. Develop a contingency plan to ensure continuity of operations to minimize the risk to employees’ PP&B as a result of ES’ efforts to redress vendor performance issues.

6. Develop internal policies to reinforce the Federal Acquisition Regulation (FAR) requirement for documenting contractor performance, and implement procedures to ensure that contractor performance is accurately assessed at the proper level and is properly documented and reported in CPARS in a timely manner.

7. Develop and implement contract management procedures to ensure COs comply with the requirements in the QASP and the FAR for performing contract monitoring and oversight.

8. Assess acquisitions workload to determine staffing levels needed for properly overseeing contractor performance.

9. Locate and file documentation reflecting invoice support and COR review for the $4,219,570.92 in unsupported costs.

10. Develop controls to ensure that CORs are following the FAR requirements for reviewing and approving invoices for payment.

11. Provide training, guidance, or other reinforcements to COs and CORs on contract management and oversight responsibilities including, but not limited to, maintaining complete contract documentation, monitoring funds, reviewing and approving invoices, and documenting contractor performance.