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PBS Needs to Strengthen Its Training and Warranting Programs for Contracting Officers

Report Number A210053/P/2/R23002
December 30, 2022

Executive Summary

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Why We Performed This Audit

This audit was included in our *Fiscal Year 2021 Audit Plan* because of contract management deficiencies identified in prior GSA Office of Inspector General audit reports. Our audit objective was to determine if the GSA Public Buildings Service's (PBS's) method and oversight of training and warranting contracting officers are effective in developing a qualified acquisition workforce that meets GSA's contracting needs, policy, and mission.

What We Found

While GSA has an acquisition career management program in place to meet its acquisition training needs, we identified a number of opportunities to improve its effectiveness. We found that PBS is not providing its contracting officers with adequate specialized training necessary to perform their jobs. We also found that PBS does not have a standardized process for qualifying and appointing contracting officers. Additionally, we found that PBS is not effectively managing warrant authority risk, warrant records for some contracting personnel are missing, and acquisition career managers are not properly designated.

What We Recommend

We recommend that the PBS Commissioner takes appropriate action to address the deficiencies described in this report by:

1. Ensuring that the training and development needs of contracting officers at the GS-12 level and above are adequately addressed to foster PBS's operational success in achieving GSA's mission.
2. Implementing a national policy to establish a standardized process for evaluating and verifying the contracting experience and qualifications of warrant applicants.
3. Implementing controls to mitigate warrant authority risks created by the limitations of the Federal Acquisition Institute Cornerstone OnDemand system.
4. Ensuring that:
 - a. Key warranting records for the PBS acquisition workforce are properly maintained; and
 - b. Heads of Contracting Activity formally appoint acquisition career managers via delegation appointment memos and communicate their duties and responsibilities.

The PBS Commissioner agreed with our recommendations. PBS's written comments are included in their entirety in **Appendix F**.

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Introduction

We performed an audit of the GSA Public Buildings Service's (PBS's) acquisition career management program to determine if it develops a qualified acquisition workforce.

Purpose

This audit was included in our *Fiscal Year 2021 Audit Plan* because of contract management deficiencies identified in prior GSA Office of Inspector General audit reports.

Objective

The objective of this audit was to determine if PBS's method and oversight of training and warranting contracting officers are effective in developing a qualified acquisition workforce that meets GSA's contracting needs, policy, and mission.

See **Appendix A** – Objective, Scope, and Methodology for additional details.

Background

The GSA acquisition workforce plays a critical role in the success of GSA's mission and its effect on successful acquisition outcomes for other federal government agencies. The acquisition environment requires highly trained and skilled contracting professionals who are equipped to exercise keen business judgment to help agencies become more efficient and deliver successful outcomes, all while safeguarding the interests of the American taxpayer.

During Fiscal Year 2021, PBS employed 634 contracting officers, 566 of which held a warrant. Collectively, these contracting officers awarded contracts totaling over \$4.8 billion. Because these contracting officers have the authority to obligate significant amounts of taxpayer dollars, they must possess a demonstrated understanding of federal and GSA acquisition regulations and policies. They must also possess knowledge and competencies across the broad spectrum of contracting in PBS, including contracts for construction, repairs and alterations, and operations and maintenance (O&M).

In recent years, the GSA Office of Inspector General has issued numerous reports identifying deficiencies in PBS's award and administration of contracts, including noncompliance with Federal Acquisition Regulation (FAR) and General Services Administration Acquisition Manual (GSAM) requirements, as well as inadequate contract solicitation, award, administration, and oversight.¹

¹ See **Appendix B** for summaries of recent audit reports identifying deficiencies in the award and administration of PBS contracts.

As a result of these findings, we performed this audit of the PBS acquisition training and warranting programs for contracting officers in the GS-1102 job series.²

Federal Acquisition Certification in Contracting

The U.S. Office of Management and Budget’s (OMB’s) Office of Federal Procurement Policy Letter 05-01, *Developing and Managing the Acquisition Workforce* (OMB Acquisition Workforce Policy), tasks acquisition career managers with managing the development of the acquisition workforce, including identifying staffing needs, training requirements, and other workforce development strategies.

The OMB Acquisition Workforce Policy requires contracting officers to be certified under the Federal Acquisition Certification in Contracting (FAC-C) program. The FAC-C program has three levels. As shown in *Figure 1* below, each program level has specific education, training, and experience requirements.

Figure 1 – FAC-C Program Levels and Requirements

	Level I	Level II	Level III
Experience	1 year of contracting work based on the GS-1102 Qualification Standard	FAC-C Level I AND 2 years of contracting work based on the GS-1102 Qualification Standard	FAC-C Level II AND 4 years of contracting work based on the GS-1102 Qualification Standard
Education	Baccalaureate degree from an accredited institution OR 24 semester hours of business-related college credits.	Baccalaureate degree from an accredited institution OR 24 semester hours of business-related college credits.	Baccalaureate degree from an accredited institution AND 24 semester hours of business-related college credits.
Training	(1) CON 100 Shaping Smart Business Arrangements or FCN 101 Contracting Basics (5 Continuous Learning Points [CLPs])	(1) CON 200 Business Decisions for Contracting (25 CLPs)	(1) CON 360 Contracting for Decision Makers (64 CLPs)
	(2) CON 091 Contract Fundamentals (104 CLPs)	(2) CON 216 Legal Considerations in Contracting (23 CLPs)	(2) Select an HBS module <i>other than</i> HBS 428
	(3) CON 121 Contract Planning (11 CLPs)	(3) CON 0510 Managing Government Property in the Possession of Contractors (2 CLPs)	(3) Develop your own plan choosing from a list of courses or opting to take 32 hours of electives. The options and guidelines for both are detailed below.
	(4) CON 124 Contract Execution (9 CLPs)	(4) HBS 428 Negotiating (2 CLPs)	Choose 1 of the following: - ACQ 265 Mission-Focused Services Acquisition (23 CLPs) - ACQ 315 Understanding Industry (37 CLPs) - ACQ 370 Contract Law (51 CLPs) - CON 244 Construction Contracting (32 CLPs) - CON 252 Fundamentals of Cost Accounting Standards (52 CLPs) - CON 370 Advanced Contract Pricing (74 CLPs) OR - 32 hours of electives related to acquisition
	(5) CON 127 Contract Management (8 CLPs)	(5) CON 280 (FED) Source Selection and Administration of Service Contracts (97 CLPs)	
	(6) FAC 023 Basic Contracting for GSA Schedules (4 CLPs)	(6) CON 290 (FED) Contract Administration & Negotiation Techniques in a Supply Environment (96 CLPs)	
	(7) FAC 031 Small Business Programs (2.5 CLPs)		
	(8) CLC 056 Analyzing Contract Costs (11 CLPs)		
	(9) CLC 057 Performance-Based Payment & Planning for Cash Flow (5 CLPs)		
	(10) CLC 058 Introduction to Contract Pricing (3 CLPs)		
	(11) CON 170 Fundamentals of Cost and Price Analysis (64 CLPs)		
	(12) FCL-CM-2500 Category Management 101 (1 CLP)		

² GS-1102 is the federal government’s job classification series for contracting officers. As of May 14, 2021, PBS had 634 contracting officers in the GS-1102 job classification series. 566 of 634 contracting officers held a warrant.

The curriculum for the training classes required for a FAC-C certification is developed by the Federal Acquisition Institute and is consistent across all federal civilian agencies.

In addition, regardless of their FAC-C level, contracting officers must complete 80 hours of continuous learning every 2 years to maintain their FAC-C certification.³ Continuous learning points can be achieved through activities such as formal and informal training, seminars and conferences, higher education courses, and professional licensing or certifications.

GSA Contracting Officer Warrant Program

Contracting officers who hold a warrant have the authority to negotiate on behalf of the U.S. government and may bind the government only to the extent of the authority delegated to them. Accordingly, GSA's Contracting Officer Warrant Program is meant to ensure that GSA organizations have qualified individuals as contracting officers who meet the organizations' needs for contracting authority. The needs of GSA dictate the types and levels of warrants issued. Factors considered when evaluating the need for warrants include volume of actions, work complexity, organizational structure, and capacity.

The GSA Contracting Officer Warrant Program is executed and administered in accordance with FAR 1.603, *Selection, appointment, and termination of appointment for contracting officers*; and GSAM 501.603, *Selection, appointment, and termination of appointment for contracting officers*. GSA's Senior Procurement Executive establishes the policies, procedures, and requirements that govern the GSA Contracting Officer Warrant Program. Each GSA Head of Contracting Activity is, among other tasks, required to establish controls to ensure compliance with laws, regulations, procedures, and good management practices with respect to warrant use by contracting officers.

All PBS warrant candidates, regardless of job series or warrant level (e.g., basic, simplified, intermediate, and senior), must meet experience, education, and any additional training requirements.⁴ This includes a FAC-C level corresponding to the appropriate type and level of warrant requested, and, in accordance with PBS Procurement Instructional Bulletin 16-04, Amendment 01, *Implementation of PBS Specific COWP [Contracting Officer Warrant Program] Acquisition Warrant Training Requirements*, additional training requirements for acquisition architect/engineer (A/E) and construction warrants.

Contracting Officer Regional Training

OMB Acquisition Workforce Policy states that an agency may require its acquisition workforce to obtain agency-specific competencies, in addition to the core competencies to fulfill its

³ In March 2020, in response to the COVID-19 pandemic, OMB's Office of Federal Procurement Policy paused the continuous learning requirement for all federal acquisition certifications. It reinstated the requirement on April 30, 2022.

⁴ A detailed listing of warranting requirements and authorities is included in **Appendix C**.

mission. While PBS offers training for its contracting officers, the responsibility for specific training requirements is decentralized by region. The regional acquisition career management point of contact serves as the liaison with the Acquisition Career Management Division. The acquisition career management points of contact are responsible for evaluating regional training needs and implementing strategies to ensure consistent professional growth across PBS's acquisition organization. This includes assessing and tracking the training needs of the PBS acquisition workforce, including: (1) certification and warrant training requirements and (2) ensuring the availability and timely completion of learning materials.

The regional acquisition career management point of contact also recommends strategic planning strategies to the regional Head of Contracting Activity and PBS leadership based upon organizational training needs, identified skill gaps, onboarding trends, and other data points. Regional contracting personnel assist the acquisition career management points of contact in developing and executing training programs specific to the procurements of the region. Similarly, training coordinators in PBS Central Office develop training programs specific to the procurements of each contracting activity.

Results

While GSA has an acquisition career management program in place to meet its acquisition training needs, we identified a number of opportunities to improve its effectiveness. We found that PBS is not providing its contracting officers with adequate specialized training necessary to perform their jobs. We also found that PBS does not have a standardized process for qualifying and appointing contracting officers. Additionally, we found that PBS is not effectively managing warrant authority risk, warrant records for some contracting personnel are missing, and acquisition career managers are not properly designated.

Finding 1 – PBS contracting officers are not receiving adequate specialized training.

Each year, PBS contracting officers are responsible for awarding contracts worth billions of dollars. However, PBS contracting officers are not receiving adequate specialized training and development necessary to perform their jobs. We found that contracting officers are in need of additional training that specifically addresses PBS's acquisitions. We also found that PBS has not developed training plans for its contracting staff at the GS-12 level and above—who make up 79 percent of PBS's acquisition workforce.

PBS Is Not Providing Its Contracting Officers with Adequate Specialized Training on PBS Acquisitions

PBS uses the FAC-C training and certification program to train its contracting officers. While this program provides a commonly used core training curriculum for the GS-1102 contracting job series across the federal government, the training primarily focuses on services used by the U.S. Department of Defense. FAC-C training does not cater to the specific needs of PBS or other agencies' contracting officers. Agency Chief Acquisition Officers are responsible for developing and maintaining an acquisition career management program that ensures an adequate professional workforce.⁵

OMB Acquisition Workforce Policy tasks acquisition career managers with managing the development of an agency's acquisition workforce, including identifying staffing needs, training requirements, and other workforce development strategies. The policy also states that an agency may require its acquisition workforce to obtain agency-specific competencies, in addition to the core competencies to fulfill its mission. Consistent with this policy, PBS requires that contracting officers who hold an intermediate- or senior-level warrant complete the A/E and construction contract training courses available through the FAC-C program.⁶

⁵ 41 U.S.C. 1702(b)(3)(G), *Chief Acquisition Officers and senior procurement executives*.

⁶ PBS Procurement Instructional Bulletin 16-04, Amendment 01.

During our audit, we reviewed training records to verify that PBS contracting officers completed the training required to address applicable federal requirements (i.e., FAC-C) and PBS policy. While we found that PBS contracting officers completed their required training, we interviewed 50 contracting officers, and they expressed a desire for more PBS-specific training. This would make their training programs more effective.

The majority of the contracting officers we interviewed stated that the contract award process for PBS-specific acquisitions is the most essential and important area for additional training. The award process includes the procurement request, acquisition planning, solicitation phase, evaluation, and award of the contract.

The contracting officers also identified additional training areas that would help improve the quality and delivery of their work products. These specific training topics included contracting for:

- Construction;
- A/E services; and
- Services contracts, including contracts for O&M, mechanical, and janitorial services.⁷

PBS contracting officers also sought training on the information technology systems commonly used by PBS contracting officers to perform their jobs. **Appendix D** presents a detailed list of the identified training topics.

Overall, the contracting officers stated that providing training on these topics would help address existing knowledge gaps for situations and scenarios they regularly encounter during the course of their daily work. The contracting officers and supervisors we interviewed also stated that PBS could improve training by developing PBS training through subject matter experts and incorporating other PBS programs or divisions, establishing in-house training provided by experienced PBS contracting officers, and sharing knowledge across regions.

It is important that PBS develop and provide effective training to ensure that its contracting officers acquire the knowledge and understanding they need to properly perform their roles in administering and overseeing PBS's unique construction, A/E, and services contracts. Doing so will help PBS prevent deficiencies in contract award and administration and contractor performance. Accordingly, PBS should consider this information and determine the best course of action to improve training. PBS should ensure that contracting officers who manage acquisitions requiring specialized knowledge, skills, and abilities receive the necessary training to successfully perform their jobs.

⁷ We have identified deficiencies in the award and administration of PBS's O&M contracts in recent audit reports. See for example, *PBS's Northeast and Caribbean Region is Not Effectively Overseeing its Operations and Maintenance Contracts* (Report Number A201046/P/2/R21007, September 24, 2021); and *Audit of a Hotline Complaint: PBS Greater Southwest Region's Operations and Maintenance Contracts* (Report Number A190054/P/4/R22001, December 16, 2021).

PBS Lacks Individual Development Plans for Contracting Staff at the GS-12 Level and Above

An individual development plan (IDP) is a tool to assist employees in career and personal development. Its primary purpose is to help employees reach short- and long-term career goals, as well as improve current job performance. In an effort to address training gaps, PBS introduced IDPs on October 1, 2021. These IDPs include standardized training courses for PBS's contracting staff at pay grades GS-7 through GS-11. The IDPs include courses on a variety of topics, including simplified acquisition procedures, independent government cost estimates, negotiating techniques, and construction contracting. This was done to standardize the development of PBS's contracting staff across all regions.

PBS stated that a standardized IDP for contracting staff at the GS-12 level and above will be planned for a future date. However, as noted previously, these contracting officers comprise 79 percent of PBS's contracting workforce and are responsible for the most complex contracting actions associated with PBS's unique real property activities. Accordingly, PBS should expedite its IDP development efforts for its contracting officers at the GS-12 level and above. This is especially important considering the recent passage of the Infrastructure Investment and Jobs Act and the Inflation Reduction Act, which provide a total of approximately \$6.8 billion to PBS for a variety of construction, modernization, and sustainability projects.

Overall, the issues described in this finding show that PBS contracting officers are not receiving enough of the specialized training they want, and likely need, to successfully perform their jobs. To have a more effective training program, PBS should provide PBS-specific, standardized training initiatives for contracting staff at the GS-12 level and above.

Finding 2 – PBS lacks a standardized process for qualifying and appointing contracting officers.

According to GSAM 501.601(a), *Definitions*, the GSA Contracting Officer Warrant Program:

Establishes the criteria for the appointment and termination of GSA contracting officers. This ensures that GSA follows a standardized process for qualifying and appointing individuals as contracting officers based on the organization's needs for contracting authority.

The Contracting Officer Warrant Board is a group of senior-level acquisition employees within a contracting activity who receive, evaluate, and process requests for selection and nomination of contracting officers at the basic, simplified, intermediate, and senior levels. Regional Heads of Contracting Activity are responsible for establishing written procedures for the Contracting Officer Warrant Board, according to GSAM 501.603-1(c), *Contracting Officer Warrant Program (COWP)*.

However, we found that some regions lacked written Contracting Officer Warrant Board procedures. We also found differences among regional Contracting Officer Warrant Board

procedures and evaluation processes for warranting contracting officers. Taken together, these deficiencies demonstrate that PBS lacks a standardized process for qualifying and appointing contracting officers.

Lack of Written Procedures

The GSAM requires regional Heads of Contracting Activity to appoint Contracting Officer Warrant Boards and establish written procedures for them.⁸ However, we found that the following four PBS regions did not have written Contracting Officer Warrant Board procedures:

- PBS's Northeast and Caribbean Region (PBS Region 2) did not have written Contracting Officer Warrant Board procedures until after our audit started. The region provided its policy, *Regional Contracting Officer Warrant Program*, on May 23, 2022. The policy was dated March 22, 2022 (4 months after our initial request).
- PBS's Mid-Atlantic Region (PBS Region 3) provided a Contracting Officer Warrant Program policy, but it did not include the Contracting Officer Warrant Board members and procedures.
- PBS's Great Lakes Region (PBS Region 5) provided a Contracting Officer Warrant Program policy, *AMD [Acquisition Management Division] Warrant Policy for New Hires from Other Agencies*, dated June 4, 2018. The policy did not include any information related to the Contracting Officer Warrant Board members and process.

In addition, the acquisition career management point of contact from PBS Region 5 stated that their Contracting Officer Warrant Board only consists of one person—the Acquisition Management Division Director/Competition Advocate. According to GSAM 501.603-2, *Selection*, the Contracting Officer Warrant Board should include a Contracting Officer Warrant Board Chair, senior leadership representing each type of warrant issued by the contracting activity, and any other designee with knowledge and experience in the warrant procedures.

- PBS's Rocky Mountain Region (PBS Region 8) did not have a formal written policy. In addition, it did not have a formally identified Contracting Officer Warrant Board.

Process Inconsistencies

In accordance with the GSAM, agencies must evaluate the warrant applicant's relevant experience as part of the approval process.⁹ However, as shown in **Appendix E**, we found that

⁸ GSAM 501.603-1(c)(3)(ii), *Responsibilities*.

⁹ GSAM 501.603-2(c)(1), *Evaluation of candidates for contracting officer warrants*.

PBS regions are evaluating candidates’ relevant experience differently. For example, some PBS regions require their warrant applicants to undergo a formal interview panel to assess a candidate’s competency, whereas other regions do not require formal interviews. We also found that some PBS regions did not have any specific processes in place.

Without written policy and procedures, the Contracting Officer Warrant Board members and their roles and responsibilities are not formally defined, and the regional warrant process could be unclear. In addition, the regional differences in the evaluation process create the appearance of inequity among warrant candidates, as some may be subject to a more rigorous approval process than others. Accordingly, PBS should develop a standardized process for qualifying and appointing contracting officers.

Finding 3 – PBS is not effectively managing warrant authority risk.

PBS regions have not updated their regional Contracting Officer Warrant Program policies to reflect the changes in the warrant process and levels resulting from the transition to the new official acquisition career management system of record (i.e., Federal Acquisition Institute Cornerstone OnDemand [FAI CSOD]). As a result, PBS is not effectively managing warrant authority risk.

Federal agencies are required to use a government-wide career management system containing education, experience, training, and other data about their acquisition workforce.¹⁰ In 2021, the Federal Acquisition Institute changed the official system of record for the federal civilian agency acquisition workforce from the Federal Acquisition Institute Training Application System (FAITAS) to FAI CSOD. The transition to FAI CSOD imposes limitations and risks to PBS management, and most PBS regions have not addressed those limitations and risks.

GSA made revisions to the GSAM to incorporate policy changes for the transition from FAITAS to FAI CSOD.¹¹ The revision removed the “up to” language on the warrant level “threshold” or ceiling level table in GSAM 501.603-1(c)(5)(iv), *Warrant level thresholds*, and the statement that “HCAs [Heads of Contracting Activity] may further limit warrant authorities and dollar values.” The revised warrant ceiling levels are shown in *Figure 2* below.

Figure 2 – Warrant Ceiling Levels

Warrant Level	Threshold (Ceiling Level)
Basic	\$25,000
Simplified	\$250,000*
Intermediate	\$10 million
Senior	Unlimited
*This is the Simplified Acquisition Threshold as of the report date.	

¹⁰ National Defense Authorization Act for Fiscal Year 1996, Public Law 104-106, Section 4307.

¹¹ GSA Order ADM 2800.12B, Change 126, issued June 14, 2021.

GSA made these revisions because FAI CSOD does not support the warrant structure flexibility previously available under FAITAS.

This is significant because with FAITAS, regional Heads of Contracting Activity were able to further restrict a contracting officer's warrant authority within specific warrant ceiling levels based on the contracting officer's experience and regional warranting needs. This flexibility provided a control to mitigate warranting risk and permitted the Head of Contracting Activity to establish good management practices with regard to warrant use.

FAI CSOD does not allow for this control. Therefore, as of the system's June 2021 deployment, PBS contracting officers' warrant authorities directly correspond to their designated warrant ceiling levels. Although significant differences exist between warrant ceiling levels, as shown in *Figure 2* on the previous page, PBS cannot further restrict these levels in FAI CSOD to mitigate warranting risk.

During our audit, we noted that most PBS regions have not updated their GSA Contracting Officer Warrant Program policies to reflect the changes in the warrant process and warrant levels after GSA's transition to FAI CSOD. This is problematic because the lack of guidance can create uncertainty among contracting officers and can be risky for PBS management if the changes are not properly addressed.

However, one PBS region has taken steps to address these issues. PBS's New England Region (PBS Region 1) uses the controls within the Electronic Acquisition System Integration (EASi) system to set appropriate warranting authority based on the contracting officer's experience and regional warranting needs. As an example, a \$10 million warranting authority is likely too high and too risky for a contracting officer who is a first-time warrant holder. PBS Region 1's practice is to set a lower maximum award amount for the contracting officer in the EASi system. Contracting officers must use EASi when requesting, soliciting, awarding, and administering contracts. This best practice enables contracting officers to build on their experience until they are better positioned to award contracts at their full warrant level.

The transition to FAI CSOD is a significant change because of the limitations and risks it imposes on PBS management. Therefore, PBS should develop controls to effectively manage its warrant authority risk associated with FAI CSOD.

Finding 4 – Warranting records are missing.

Warranting records are important to acquisition workforce management because they provide the information used to determine a contracting officer's eligibility to hold a warrant. However, in some cases, neither PBS nor its contracting officers retained those records.

PBS requires warrant applicants to prepare application packages that include GSA Form 3409, *Personal Qualifications Statement for Appointment as Contracting Officer* (personal qualifications form); GSA Form 3410, *Request for Appointment* (appointment request form);

transcripts; training certificates; resume; and any other documents to support that they meet the training, experience, and education requirements for the level and type of warrant being requested.

In accordance with GSAM 501.603-3, *Appointment*, these records must be kept and maintained in the career management system of record. GSAM 501.603-3 also provides that contracting officers are responsible for maintaining a copy of their acquisition training history and source documents used for certification requests.

However, in some cases, the records to support the warrants for PBS's contracting personnel and ensure their eligibility are missing. We selected a sample of 82 warrant application packages from PBS's 11 regional offices and found that 3 of the application packages were incomplete, as discussed below:

- For one employee from PBS's Northwest Arctic Region (PBS Region 10), the personal qualifications form was missing;
- For two employees (one each from PBS Regions 8 and 10), the appointment request forms were missing; and
- For one employee from PBS's Pacific Rim Region (PBS Region 9), all warranting records were missing.

While we found problems with only 3 of the 82 warrant application packages that we sampled, this may indicate a broader issue. This is because when GSA transitioned its career management system from FAITAS to FAI CSOD in June 2021, it did not migrate or retain all the warrant records that were housed in FAITAS.

Although contracting staff were initially instructed to download their records, these instructions were subsequently rescinded. Specifically, on February 2, 2021, an email from the GSA Acquisition Portal instructed the acquisition workforce to download copies of their certifications, warrants, and any other data stored in FAITAS (e.g., application packages, training certificates, etc.). However, on March 23, 2021, the Federal Acquisition Institute issued conflicting guidance, which instructed the acquisition workforce not to download the files from FAITAS. According to the email, the download of large files was resource-intensive, a strain on the FAITAS infrastructure, and could have jeopardized the system's availability during the last several months of planned use. As a result, the warrant records for some contracting staff that were housed in the system are now missing. In fact, the employee from PBS Region 9 who could not provide any warranting records stated that their information was stored in FAITAS, but was no longer available due to the transition to FAI CSOD. We were able to obtain some warrant records from some PBS regional offices that had retained the warrant applications; however, not all regional offices retained the records.

The warranting records are important to acquisition workforce management because they include information used by supervisors, the Contracting Officer Warrant Board, and regional Heads of Contracting Activity to determine eligibility to hold a warrant. Without access to these records, PBS cannot verify or prove that the process for qualifying and warranting contracting officers was followed.

Finding 5 – PBS acquisition career managers do not have official delegation appointment memos.

The acquisition career management point of contact is the GSA official identified by the regional Head of Contracting Activity to lead the implementation of acquisition certification, warrant, training, and career development programs for their organization. According to GSAM 501.601, *General*, the Head of Contracting Activity is responsible for establishing an infrastructure to support acquisition career management through delegation memos.

However, we found that the acquisition career managers in PBS Regions 3, 8, 9, and PBS's National Capital Region (PBS NCR) did not have the required delegation appointment memos. Without these delegation memos, the acquisition career managers' roles and responsibilities may not be clearly communicated and understood, resulting in a potentially ineffective acquisition career management infrastructure.

PBS should ensure that the regional Heads of Contracting Activity formally appoint the acquisition career managers via delegation memos and communicate their duties and responsibilities.

Conclusion

While GSA has an acquisition career management program in place to meet its acquisition training needs, we identified a number of opportunities to improve its effectiveness. We found that PBS is not providing its contracting officers with adequate specialized training necessary to perform their jobs. We also found that PBS does not have a standardized process for qualifying and appointing contracting officers. Additionally, we found that PBS is not effectively managing warrant authority risk, warrant records for some contracting personnel are missing, and acquisition career managers are not properly designated.

The GSA acquisition workforce plays a critical role in the success of GSA's mission and its effect on successful acquisition outcomes for other federal government agencies. Accordingly, PBS should take appropriate measures to ensure that it is meeting the training and development needs of its contracting officers. In addition, PBS should implement a national policy establishing a standardized process for evaluating and appointing warrant applicants and controls to mitigate warrant authority risks. Finally, PBS should ensure that key warranting records are properly maintained, and that the regional Heads of Contracting Activity formally appoint the acquisition career managers via delegation memos and communicate their duties and responsibilities.

Recommendations

We recommend that the PBS Commissioner takes appropriate action to address the deficiencies described in this report by:

1. Ensuring that the training and development needs of contracting officers at the GS-12 level and above are adequately addressed to foster PBS's operational success in achieving GSA's mission.
2. Implementing a national policy to establish a standardized process for evaluating and verifying the contracting experience and qualifications of warrant applicants.
3. Implementing controls to mitigate warrant authority risks created by the limitations of the FAI CSOD system.
4. Ensuring that:
 - a. Key warranting records for the PBS acquisition workforce are properly maintained; and
 - b. Heads of Contracting Activity formally appoint acquisition career managers via delegation appointment memos and communicate their duties and responsibilities.

GSA Comments

The PBS Commissioner agreed with our recommendations. PBS's written comments are included in their entirety in **Appendix F**.

Audit Team

This audit was managed out of the Northeast and Caribbean Region Audit Office and conducted by the individuals listed below:

Arthur Maisano	Regional Inspector General for Auditing
Yajaira Torres	Audit Manager
Anna Naumova	Auditor-In-Charge

Appendix A – Objective, Scope, and Methodology

Objective

This audit was included in our *Fiscal Year 2021 Audit Plan* because of contract management deficiencies identified in prior GSA Office of Inspector General audit reports. Our audit objective was to determine if PBS's method and oversight of training and warranting contracting officers are effective in developing a qualified acquisition workforce that meets GSA's contracting needs, policy, and mission.

Scope and Methodology

We assessed PBS's acquisition career management program to determine if it develops a qualified acquisition workforce. Our audit scope included interviewing a judgmental sample of 50 contracting officers in the GS-1102 job series as of May 14, 2021. It also included a judgmental sample of 82 warrant files from warranted contracting officers from PBS's 11 regions. All fieldwork was conducted virtually from January through April 2022.

To accomplish our objective, we:

- Reviewed prior GSA Office of Inspector General audit reports that were significant to the audit objective;
- Reviewed the U.S. Government Accountability Office's *Standards for Internal Control in the Federal Government* (GAO-14-704G);
- Reviewed relevant criteria, including the FAR, GSAM, and GSA and PBS guidance and procedures;
- Reviewed OMB's Office of Federal Procurement Policy Letter 05-01, *Developing and Managing the Acquisition Workforce*;
- Obtained and reviewed regional warrant program policy from PBS's 11 regions;
- Reviewed descriptions for courses that contracting officers are required to complete;
- Held meetings and corresponded with PBS Central Office and GSA Office of Government-wide Policy to gain an understanding of PBS's policies and procedures related to the FAC-C program, IDPs, the FAI CSOD migration, acquisition training, the warranting process, and changes to the GSAM due to the transition from FAITAS to FAI CSOD;
- Interviewed 11 acquisition career management points of contact from PBS's 11 regional offices to gain an understanding of the supplemental training PBS offers to its contracting officers;
- Interviewed PBS contracting personnel;
- Interviewed PBS officials to gain an understanding of PBS policies pertinent to our audit objective; and
- Reviewed contracting officers' training, warrants, and certification records.

Data Reliability

During our audit, GSA was in the process of transitioning from FAITAS to FAI CSOD. We could not fully ascertain all aspects of data reliability because: (1) we did not have access to FAITAS due to system migration and (2) FAI CSOD did not contain all training and warrant information available during our fieldwork.

To obtain reasonable assurance that we had complete and accurate data, we compared all data sets from FAITAS, FAI CSOD, and the data sets obtained from PBS's 11 regions and PBS Central Office to identify and investigate differences. In addition, we conducted interviews and reviewed a judgmental sample of contracting officers' training, warrants, and certification records to confirm the accuracy of the data. We determined that these data were sufficiently reliable for the purposes of this audit.

Sampling

We selected a judgmental sample of 50 out of 634 PBS contracting officers in the GS-1102 job series as of May 14, 2021. Our sample included 44 contracting officers and 6 supervisory contracting officers, 45 of whom (90 percent) were a GS-12 or above from PBS's 11 regions. We interviewed the sampled contracting officers to determine if PBS contracting personnel are receiving appropriate training that relates to their work.

We also judgmentally sampled 82 warrant files from 566 warranted contracting officers from PBS's 11 regions. Our sample included all warrant types, such as basic, simplified acquisition, intermediate, and senior unlimited. We reviewed the warrant files to verify the contracting officers training, warrants, and certification records.

Internal Controls

We assessed internal controls significant within the context of our audit objective against GAO-14-704G, *Standards for Internal Control in the Federal Government*. The methodology above describes the scope of our assessment and the report findings include any internal control deficiencies we identified. Our assessment is not intended to provide assurance on GSA's internal control structure as a whole. GSA management is responsible for establishing and maintaining internal controls.

Compliance Statement

We conducted the audit between May 2021 and April 2022 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Appendix B – Prior GSA Office of Inspector General Audit Reports – Oversight of PBS Contracts

This appendix presents summaries of GSA Office of Inspector General audit reports that identified deficiencies in the oversight of PBS contracts. These deficiencies include noncompliance with FAR and GSAM requirements, as well as inadequate contract solicitation, award, and administration.

- ***Audit of a Hotline Complaint: PBS Greater Southwest Region’s Operations and Maintenance Contracts (Report Number A190054/P/4/R22001, December 16, 2021)***

We determined that PBS’s Greater Southwest Region (PBS Region 7) awarded O&M contracts with pricing based on flawed independent government estimates and faulty price reasonableness determinations. PBS Region 7 also failed to properly administer the O&M contracts. Specifically, PBS inconsistently applied the shared liability clause. Additionally, PBS paid the O&M contractor for unallowable costs for additional services, failed to enforce staffing requirements, and did not verify that the O&M contractor performed required services.

- ***PBS’s Northeast and Caribbean Region is Not Effectively Overseeing its Operations and Maintenance Contracts (Report Number A201046/P/2/R21007, September 24, 2021)***

We found that PBS Region 2 did not effectively oversee contractor performance on its O&M contracts. As a result, PBS Region 2 lacked assurance that O&M contractors are providing the services required under their contracts. Inspections are required to oversee O&M contractors and ensure they are performing their responsibilities under the contract. However, we found that PBS contracting personnel either did not inspect the contractors’ work or did not perform the inspections properly. We also found that PBS preventative maintenance records did not always include required information necessary to oversee the O&M contractors’ performance.

- ***Audit of PBS Basic Repairs and Alterations Project: United States Court of International Trade Building (Report Number A200976/P/2/R21004, June 17, 2021)***

We found that PBS Region 2 did not award and administer the contract to upgrade three passenger elevators at the United States Court of International Trade building in accordance with applicable regulations and GSA policies. We found that PBS Region 2 did not obtain a Conflict of Interest Acknowledgment and Nondisclosure Agreement form from each member of the Source Selection Evaluation Board. We also found that PBS allowed a project manager to act as a contracting officer’s representative for over a year without the proper written delegation of authority. Additionally, PBS did not maintain necessary contract file documentation and inaccurately reported data on the contract in the Federal Procurement Data System-Next Generation.

- ***PBS’s National Capital Region is Failing to Adequately Manage and Oversee the Building Services Contracts at the FDA’s White Oak Campus (Report Number A190021/P/5/R21003, May 17, 2021)***

We found multiple issues with PBS NCR’s management and oversight of the U.S. Food and Drug Administration’s White Oak campus, especially with its oversight of the Energy Savings Performance Contract (ESPC) task order that provides O&M building services on the campus. We found that:

1. PBS NCR did not enforce requirements of the ESPC task order. As a result, PBS NCR has no assurance that the contract is achieving the guaranteed cost savings needed to fund the \$1.2 billion contract and is planning to pay for repairs that are the contractor’s responsibility.
2. Due to mismanagement and lack of oversight of the after-hours O&M services, PBS NCR charged the U.S. Food and Drug Administration for overpriced services that are not being provided.
3. Security at the White Oak campus was impaired because PBS NCR did not ensure that security protocols were followed.
4. PBS NCR mismanaged fire, life, and safety services for the White Oak campus, placing the facilities and personnel at risk.
5. PBS NCR allowed employees to perform contracting officer’s representative duties although they lacked the required certification.
6. PBS NCR improperly provided the contractor with the “right of first refusal” for all O&M work on the campus, undermining competition and pricing.
7. PBS NCR improperly destroyed contract file documentation, violating the Federal Records Act, the FAR, and GSA policy.
8. PBS NCR did not provide a clean, sanitary, safe, and healthy space at the child care center due to unresolved performance issues with the custodial contractor.

- ***Audit of PBS Basic Repairs and Alterations Project: Federal Bureau of Prisons Headquarters (Report Number A200976/P/R/R21002, issued April 21, 2021)***

We found that PBS NCR did not award and administer the contract to replace the three cooling towers at the Federal Bureau of Prisons headquarters building in accordance with the FAR and GSA policies. We found that PBS NCR did not meet the requirement of defining a viable period of performance for the contract. PBS also did not maintain required contract documentation, did not follow internal policy related to staff transition, and inaccurately reported data on the contract in the Federal Procurement Data System-Next Generation.

Appendix C – Acquisition and Acquisition Architect/Engineering and Construction Warrant Requirements and Authorities

Warrant Type and Warrant Authority	Warrant Level	Dollar Amount	Certification Requirement	Experience Requirement	Education Requirement	Additional Training Requirements
Acquisition¹²	Basic – I	\$25,000	FAC-C Level I	1 year of contracting experience within the last 3 years	For Basic – I, Simplified – II, and Intermediate – III: Baccalaureate degree or 24 semester hours of business-related college courses	CON 237: Simplified Acquisition
	Simplified – II	\$250,000	FAC-C Level I	2 years of contracting experience within the last 5 years		
	Intermediate – III	\$10 million	FAC-C Level II	3 years of contracting experience within the last 7 years		FAC 043: Ethics & Procurement Integrity for the Acquisition Workforce
	Senior – IV	Unlimited	FAC-C Level III	4 years of contracting experience within the last 10 years	For Senior – IV: Baccalaureate degree and 24 semester hours of business-related college courses	Performance-Based Acquisition course (23 hour minimum) – Required for Simplified-, Intermediate-, and Senior-level warrants
Acquisition Architect/Engineering and Construction¹³	Intermediate – III	\$10 million	FAC-C Level II	3 years of contracting experience within the last 7 years	For Intermediate – III: Baccalaureate degree or 24 semester hours of business-related college courses	CON 237: Simplified Acquisition; FAC 043: Ethics and Procurement Integrity for the Acquisition Workforce; Performance-Based Acquisition course (23 hour minimum); and CON 243: Architect and Engineering Services
	Senior – IV	Unlimited	FAC-C Level III	4 years of contracting experience within the last 10 years	For Senior – IV: Baccalaureate degree and 24 semester hours of business-related college courses	CON 244: Construction Contracting

¹² Acquisition warrants allow contracting officers to: (1) make and administer purchases and contracts for supplies and services; and (2) place and administer orders against contracts established by GSA or another federal agency when the contract authorizes or requires GSA to place orders.

¹³ Acquisition Architect/Engineering and Construction warrants allow contracting officers to: (1) award and administer contracts, to include A/E and construction services; and (2) place and administer orders against contracts established by GSA or another federal agency when the contract authorizes or requires GSA to place orders.

Appendix D – Additional Training Topics Identified by PBS Contracting Officers

Construction Contracting – Contracting for construction comes with its own set of policies and procedures. PBS contracting officers must understand the process of construction acquisition and contracting phases to successfully obtain goods and services. This includes an understanding of unique construction contracting, such as acquisition planning, market research, construction contract language, construction solicitation, firm-fixed price construction, and condition changes on a construction contract. PBS training would also include training for specific project delivery methods, including construction manager as constructor, design-build contracts, design-bid-build contracts, and two-phase design-build selection procedures.

Contracting for Architect-Engineer Services – PBS procures A/E services that include the production and delivery of designs, plans, drawings, and specifications. Procurement of A/E services is governed by the Brooks Act (Public Law 92-582) and FAR 36, *Construction and Architect-Engineer Contracts*. It is important that PBS contracting officers gain the knowledge and skills to contract for A/E services to ensure they can successfully meet PBS’s mission. In addition, the GSA Acquisition Workforce Division within the Office of Government-wide Policy informed us that it has identified A/E services as a specialty acquisition that requires a formal training program.

Services Contracts – Services contracts include O&M, mechanical, and custodial and related services contracts. The PBS facilities O&M services contracts intertwine with construction efforts, such as electrical systems and equipment; mechanical equipment; plumbing; heating, ventilation, and air conditioning systems; fire protection; and life safety systems and equipment. Therefore, the majority of PBS contracts fall under facilities maintenance and repair. The PBS contracting officers we interviewed described services contracts as an umbrella of different areas. They stated that receiving PBS-specific training in these areas is crucial because in their day-to-day work they manage contracts with combined services (e.g., janitorial, snow removal, mechanical maintenance, and landscaping) that are interrelated in scope.

U.S. Small Business Administration’s 8(a) Business Development Program – The 8(a) Business Development Program (8(a) Program) is a business assistance program for small disadvantaged businesses. The 8(a) Program is administered by the U.S. Small Business Administration. To streamline the process, the U.S. Small Business Administration delegates authority to contract with 8(a) Program participants through a partnership agreement with GSA. The partnership agreement provides for the award of contracts, modifications, options, and purchase orders. It is important that PBS contracting officers understand and comply with 8(a) Program regulations that govern contract awards and administration of such contracts.

AbilityOne Program – In accordance with the Javits-Wagner O’Day Act (41 U.S.C. 8501-8506), federal agencies are required to procure supplies and services from nonprofit agencies employing persons who are blind or have other significant disabilities. In October 2020, OMB’s Office of Federal Procurement Policy asked federal agencies to commit to a pledge of at least 1 percent of their Fiscal Year 2021 total spending to the AbilityOne Program, with an additional increase of 0.5 percent for Fiscal Year 2022. GSA increased its pledge to 2.5 percent for Fiscal Year 2022. Through strategic alliance agreements, GSA has developed over 300 AbilityOne Program contracts worth greater than \$500 million combined.¹⁴ It is necessary that contracting officers have an understanding of AbilityOne Program requirements in order to ensure the Agency’s contracting goals are met or exceeded.

Source Selection – Source selection is a critical phase of the preaward procurement process. It involves evaluating a competitive bid or proposal to award a contract. FAR 15.3, *Source Selection*, prescribes policies and procedures for selection of a source or sources in competitive negotiated acquisitions. This area requires analytical skills to perform a preaward evaluation, establish criteria, and evaluate proposals based on the established criteria in a source selection plan. PBS contracting officers are often responsible for evaluating and making award determinations in multimillion dollar contract proposals. It is imperative that PBS contracting staff attain the skills necessary to successfully perform this task.

Federal Supply Schedule – FAR 38, *Federal Supply Schedule Contracting*.

Simplified Acquisition Procedures/Micro-Purchase – FAR 13, *Simplified Acquisition Procedures*.

Soft Skills Training – This includes critical thinking, business writing, communication, negotiation, time management, leadership skills, and problem-solving skills.

Technical Systems Training:

- **Contractor Performance Assessment Reporting System (CPARS)** – CPARS is the federal government-wide system used to document and report contractor performance.
- **FAI Cornerstone OnDemand (FAI CSOD)** – FAI CSOD is the official acquisition career management system of record as of June 1, 2021.
- **Electronic Acquisition System Integration (EASi)** – Contracting officers use EASi when requesting, soliciting for, awarding, and administering contracts. The use of EASi ensures there is a clear record of PBS’s contractual actions.

¹⁴ GSA’s overview of AbilityOne, <https://www.gsa.gov/resources-for-%E2%80%A6/federal-customers/strategic-programs/abilityone>.

Appendix E – Regional Warrant Applicant Evaluation Process Inconsistencies

PBS Region 1	PBS Region 2	PBS Region 3	PBS Region 4	PBS Region 5	PBS Region 6	PBS Region 7	PBS Region 8	PBS Region 9	PBS Region 10	PBS NCR
<ul style="list-style-type: none"> Reviewing contract files is optional. Bureau Career Manager may elect to review a random sampling of the applicant's contract files. If satisfied, the Bureau Career Manager will schedule the warrant interview. The responsible Branch Chief may review contracts of all warrant holders in their business line at any time. The policy includes a candidate interview. 	<ul style="list-style-type: none"> The policy only states that the Contracting Officer Warrant Board is responsible for ensuring that candidates meet the experience and training requirements. The policy does not establish or include any specific evaluation criteria for a candidate's relevant experience. The policy includes a candidate interview. 	<ul style="list-style-type: none"> The policy does not establish or include any specific evaluation criteria for a candidate's relevant experience. The policy does not call for a candidate interview. 	<ul style="list-style-type: none"> No less than three of a candidate's recent contract files will be reviewed. Findings of best practices or areas of concern will be compiled. The policy includes a candidate interview. 	<ul style="list-style-type: none"> The policy is for new hire employees who have transferred from other agencies. Candidate must meet minimum services requirements and management must review three procurement actions. Actions reviewed shall consist of one base award and two other actions. Actions reviewed must be at the same level or higher as the anticipated warrant. Senior warrant requests should use actions at the intermediate level. The policy does not call for a candidate interview. 	<ul style="list-style-type: none"> The Contracting Officer Warrant Board will verify a candidate's relevant experience by considering the quality of past contracts and leases and the results of any independent review(s) the contracting activity has conducted. The Region has a process guide for warrant applications and a checklist for acquisition warrants. Supervisors must conduct an independent review of recent contracts on which the candidate has worked. These contracts should have been awarded in the past 6 months, if possible. The policy does not call for a candidate interview. 	<ul style="list-style-type: none"> A sampling of no less than three recent files will be reviewed by the candidate's supervisor and the Regional ACM [acquisition career manager]. The findings will be compiled, noting best practices or areas of concern. The policy does not establish or include any specific evaluation criteria for a candidate's relevant experience. The policy does not call for a candidate interview. 	<ul style="list-style-type: none"> The policy does not establish or include any specific evaluation criteria for a candidate's relevant experience. The policy does not call for a candidate interview. 	<ul style="list-style-type: none"> Contracting Officer Warrant Board's review includes consideration of the candidate's relevant experience, quality of past contracts, leases, and contract files, and adherence to policy. The policy does not call for a candidate interview. 	<ul style="list-style-type: none"> Review of at least two of the candidate's procurement actions is required. Supervisor or Branch Chief conducts at least one independent contract review. The policy does not call for a candidate interview. 	<ul style="list-style-type: none"> The policy does not establish or include any specific evaluation criteria for a candidate's relevant experience. The policy includes a candidate interview.

Appendix F – GSA Comments


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Public Buildings Service

December 16, 2022

MEMORANDUM FOR: ARTHUR MAISANO
REGIONAL INSPECTOR GENERAL FOR AUDITING
NORTHEAST AND CARIBBEAN REGION
OFFICE OF INSPECTOR GENERAL
U.S. GENERAL SERVICES ADMINISTRATION (JA-5)

FROM: NINA M. ALBERT
COMMISSIONER 
PUBLIC BUILDINGS SERVICE (P)

SUBJECT: Response to the Office of Inspector General Draft Audit
Report, *PBS Needs to Strengthen Its Training and Warranting
Programs for Contracting Officers*, Report Number A210053

The Public Buildings Service (PBS) thanks the GSA Office of Inspector General (OIG) for the opportunity to review and comment on the subject draft audit report. We take this issue very seriously and appreciate and agree with OIG's recommendations. PBS will improve specialized training necessary for contracting officers to perform their jobs, develop a standardized process for qualifying and appointing contracting officers, and ensure contracting personnel records are updated and acquisition career managers are properly designated.

PBS is working toward those goals. While PBS also agrees with OIG's recommendation to implement controls to mitigate warrant authority risks, we note that the issues identified in Finding 3 of the draft audit report were the result of the transition to a new official acquisition career management system, which affected most of the Federal Government. However, PBS is actively working to implement appropriate controls to effectively manage warranting authority risk, as noted in the draft audit report for Region 1. Additionally, PBS is committed to providing contracting officers the required Federal Acquisition Certification in Contracting (FAC-C) program training and additional specialized training that ensures they have the skills and knowledge to contract for PBS requirements.

Thank you again for the opportunity to review and comment on the draft report. If you have any questions, please contact Tracy Marcinowski, Assistant Commissioner, Office of Acquisition Management, Public Buildings Service, at (202) 676-7477.

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Appendix G – Report Distribution

GSA Administrator (A)

GSA Deputy Administrator (AD)

Commissioner (P)

Deputy Commissioner (PD)

Chief of Staff (PB)

Deputy Chief of Staff (PB)

Assistant Commissioner for Strategy & Engagement (PS)

Chief Financial Officer (B)

Deputy Chief Financial Officer (B)

Office of Audit Management and Accountability (BA)

Assistant Inspector General for Auditing (JA)

Deputy Assistant Inspector General for Acquisition Program Audits (JA)

Deputy Assistant Inspector General for Real Property Audits (JA)

Director, Audit Planning, Policy, and Operations Staff (JAO)