

# NASA

National Aeronautics and Space Administration

Office of Inspector General

Office of Audits

# NASA'S MANAGEMENT OF ITS ACQUISITION WORKFORCE

October 27, 2020

Report No. IG-21-002





## **Office of Inspector General**

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NASA Office of Inspector General  
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# RESULTS IN BRIEF

## NASA's Management of Its Acquisition Workforce

October 27, 2020

IG-21-002 (A-20-004-00)

### WHY WE PERFORMED THIS AUDIT

NASA uses contracts, cooperative agreements, and grants to fund research and development and purchase services, supplies, and equipment to support every facet of its operations. In fiscal year 2019, NASA spent approximately \$19.5 billion or 91 percent of its \$21.5 billion in available resources on procurements. This amount is expected to increase in fiscal year 2021 given the Agency's request for additional resources to support the Administration's mandate to return astronauts to the Moon by 2024—4 years ahead of NASA's original schedule. The accelerated timetable will likely result in accelerated acquisition decisions, increasing the risk of inefficient and ineffective contracting practices as well as the potential for fraud.

NASA's challenges with contracting and acquisition oversight are long-standing. The Government Accountability Office (GAO) first designated NASA's acquisition management as high risk in 1990 due to the Agency's history of persistent cost growth and schedule delays in most of its major projects. Similarly, for the past 13 years the NASA Office of Inspector General has consistently reported on a variety of acquisition issues in our annual report to Congress on the top management and performance challenges facing the Agency. Moreover, in November 2019, we designated "attracting and retaining a highly skilled workforce" as a new top management challenge facing NASA. Given the tens of billions of dollars devoted to procuring goods and services and the recent decision to accelerate plans for a Lunar landing, it is essential that NASA maintain a highly skilled acquisition workforce. This workforce must be capable of efficiently and effectively utilizing taxpayer funds, as well as responsive and agile enough to achieve NASA's ambitious portfolio of missions in creative yet appropriate ways.

Our objective in this audit was to examine the readiness of NASA's acquisition workforce to respond to current and future contracting needs. Specifically, we examined the extent to which NASA's acquisition workforce is (1) aligned with current and future contracting needs and (2) trained and certified in accordance with federal and NASA requirements. To conduct this work, we spoke with relevant Agency personnel about strategic workforce planning, training, and certification requirements. We also interviewed a selection of contracting personnel and program/project managers to obtain their viewpoints on the acquisition process, its strengths, and areas for improvement. Further, we reviewed key documents addressing the restructuring of the Office of Procurement and analyzed its training and policy handbooks.

### WHAT WE FOUND

NASA is working to develop an agile and mission-driven acquisition workforce to address major mission needs in the coming years, including the plan to return astronauts to the Moon 4 years ahead of the Agency's original schedule. In October 2019, NASA's Office of Procurement began implementing its enterprise-wide workforce transition—referred to as the Mission Support Future Architecture Program (MAP)—and developed its Strategic Workforce Plan to anticipate and meet future acquisition needs, mitigate the risks of a changing workforce, and more efficiently manage the acquisition workload. Overall, while these plans appear to follow the GAO's best practices for acquisition management,

additional data and performance metrics could improve data validity, help the Office of Procurement accurately assess capabilities of their staff and resources, increase visibility of workforce staffing needs and skill gaps, and inform management reporting.

We also found that NASA policy generally aligns with federal requirements for certification and training of the acquisition workforce. In addition, 95 percent of NASA's certified acquisition workforce met continuous learning requirements needed to maintain their certification in the reporting periods we evaluated. However, the Agency's migration to the Federal Acquisition Institute Training Application System (FAITAS), the official system of record for acquisition programs, is incomplete. As such, NASA relies on multiple systems and stakeholders to manage these certification programs, reducing the Agency's ability to fully validate the accuracy and completeness of workforce certification and training data. As a result, NASA failed to detect about 200 Contracting Officer's Representatives (COR)—the individuals responsible for monitoring and administering contracts—who did not meet their required training in the reporting period, 24 of whom continued to work on contract actions during the time of our review.

## WHAT WE RECOMMENDED

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To help ensure the success of the MAP transformation, we recommended the Assistant Administrator for Procurement (1) finalize and implement the performance metrics dashboard to measure acquisition performance, and (2) document contract assignments in a centralized system. To comply with federal requirements to manage acquisition related training and certifications and to streamline the process of monitoring and reporting learning for Federal Acquisition Certificate holders, we recommended the Chief Financial Officer (3) ensure all certified contracting and COR program participants utilize FAITAS to record their certifications and continuous learning requirements by an established deadline. To ensure that CORs performing on contracts have active certifications, we recommended the Assistant Administrator for Procurement (4) take action to ensure that active CORs who have not met continuous learning requirements are removed from their COR positions in a timely manner.

We provided a draft of this report to NASA management, who concurred or partially concurred with our recommendations. We consider management's comments responsive to Recommendations 1, 3, and 4; therefore, those recommendations are resolved and will be closed upon verification and completion of the proposed corrective actions. Management partially concurred with Recommendation 2, stating that it cannot link program/project managers to their contract assignments because the Office of Procurement lacks an existing data source. Nonetheless, we believe that the ability to link contract assignments to acquisition workforce personnel is essential to the Office of Procurement's efforts to monitor and measure workforce performance and establish a baseline for operations at an enterprise level. As such, this recommendation will remain unresolved pending further discussions with Agency officials.

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# Acronyms

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CO	Contracting Officer
COR	Contracting Officer’s Representative
FAC	Federal Acquisition Certification
FAITAS	Federal Acquisition Institute Training Application System
GAO	Government Accountability Office
OIG	Office of Inspector General
MAP	Mission Support Future Architecture Program
NSSC	NASA Shared Services Center
PSL	Product Service Line

# INTRODUCTION

NASA utilizes procurement vehicles such as contracts, cooperative agreements, and grants to fund research and development and purchase services, supplies, and equipment to support every facet of its operations. In fiscal year 2019, NASA spent approximately \$19.5 billion or 91 percent of its \$21.5 billion in available resources on procurements. This amount is expected to increase in fiscal year 2021 given the Agency's request for additional resources to support the Administration's March 2019 mandate to return astronauts to the Moon by 2024, 4 years ahead of NASA's original schedule.<sup>1</sup> The accelerated timetable will likely result in accelerated acquisition decisions, increasing the risk of inefficient and ineffective contracting practices as well as the potential for fraud. Compounding this risk in the near term is NASA's implementation of a provision in the Coronavirus Aid, Relief, and Economic Security Act that allows NASA and other federal agencies to modify the terms and conditions of a contract to pay contractors who are not able to work through no fault of their own due to the pandemic.<sup>2</sup>

NASA's challenges with contracting and acquisition oversight are long-standing. The Government Accountability Office (GAO) first designated NASA's acquisition management as high risk in 1990 due to the Agency's history of persistent cost growth and schedule delays in the majority of its major projects. Similarly, for the past 13 years the NASA Office of Inspector General (OIG) has consistently reported on a variety of acquisition issues in our annual report to Congress on the top management and performance challenges facing the Agency. Moreover, in November 2019, we designated "attracting and retaining a highly skilled workforce" as a new top management challenge facing NASA.<sup>3</sup> Given the tens of billions of dollars devoted to procuring goods and services and the recent decision to accelerate plans for a Lunar landing, it is essential that NASA maintain a highly skilled acquisition workforce that is both capable of efficiently and effectively utilizing taxpayer funds and responsive and agile enough to achieve NASA's ambitious portfolio of missions in creative but appropriate ways.

Our objective in this audit was to examine the readiness of NASA's acquisition workforce to respond to current and future contracting needs. Specifically, we examined the extent to which NASA's acquisition workforce is (1) aligned with current and future contracting needs and (2) trained and certified in accordance with federal and NASA requirements. See Appendix A for details of the audit's scope and methodology.

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<sup>1</sup> Vice President Pence's remarks at the fifth meeting of the National Space Council, Huntsville, Alabama (March 26, 2019).

<sup>2</sup> The Coronavirus Aid, Relief, and Economic Security Act or the CARES Act, Pub. L. No. 116-136 (2020) responds to the coronavirus disease outbreak and its impact on the economy, public health, state and local governments, individuals, and businesses. Section 3610 permits federal agencies to reimburse contractors for their inability to work due to facility closures or other restrictions as a result of the public-health emergency declared on January 31, 2020, using either regular agency appropriations or CARES Act supplemental funding.

<sup>3</sup> NASA OIG, *2019 Report on NASA's Top Management and Performance Challenges* (November 13, 2019).

## Background

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NASA’s acquisition workforce encompasses more than 4,000 employees working at every NASA Center and Agency facilities both within the Agency’s Office of Procurement and the mission directorates.<sup>4</sup> These personnel are required to hold certifications specific to their acquisition duties and maintain continuous learning to ensure they are knowledgeable about the acquisition functions that they perform. Historically, acquisition activity has been performed predominantly in a decentralized fashion at each of the NASA Centers, and contracting personnel have operated primarily within their individual location to meet Center-specific requirements; however, the Office of Procurement is currently undergoing a transformation effort due to be fully implemented by 2024, to enable its workforce to be more agile and mission-driven to respond to the Agency’s mission by implementing an enterprise architecture and operating model while optimizing efficiencies and reducing duplication.

### Defining the Acquisition Workforce

NASA’s acquisition workforce includes contracting officers (CO), contracting officer’s representatives (COR), and program/project managers who are tasked with overseeing the award and administration of contracts. In addition, administrative support personnel, contract specialists, and cost analysts also support NASA’s acquisition functions. While the COs, contract specialists, cost analysts, and administrative support personnel are aligned within the Office of Procurement, the CORs and program/project managers work directly within NASA’s mission directorates that rely on acquisitions to accomplish their mission. Table 1 provides an overview of the roles and responsibilities of the acquisition workforce and the organization where each role resides.

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<sup>4</sup> NASA has four mission directorates—Aeronautics Research, Human Exploration and Operations, Science, and Space Technology.

**Table 1: Acquisition Workforce Roles and Responsibilities**

Position Title	Roles and Responsibilities	Organization
Contracting Officer (CO)	<p>Person with the authority to enter into, administer, and/or terminate contracts and make related determinations and findings. Responsible for ensuring performance of all necessary actions for effective contracting, ensuring compliance with the terms of the contract, and safeguarding the interests of the United States in its contractual relationships.</p> <ul style="list-style-type: none"> <li>• Ensure requirements of law, executive orders, regulations, and all other applicable procedures, including clearances and approvals, have been met and that funds are available for obligation.</li> <li>• Ensure that contractors receive impartial, fair, and equitable treatment.</li> <li>• Request and consider the advice of specialists in audit, law, engineering, information security, transportation, and other fields, as appropriate.</li> <li>• Designate and authorize, in writing and in accordance with Agency procedures, a COR on all contracts and orders other than those that are firm-fixed price, and for firm-fixed price contracts and orders as appropriate, unless the CO retains and executes the COR duties.</li> </ul>	Office of Procurement
Contracting Officer's Representative (COR)	<p>Person within a mission directorate who plays a critical role in ensuring that contractors meet the commitment of their contracts. CORs facilitate proper development of requirements and assist COs in developing and managing their contracts. Mission directorates with a requirement for supplies or services nominate individuals that will serve as the COR. The CO considers the nomination, then designates and authorizes the individual to perform specific technical or administrative functions.</p> <ul style="list-style-type: none"> <li>• Assist in the technical monitoring or administration of a contract.</li> <li>• Maintain a file for each assigned contract.</li> </ul>	Mission Directorate
Program/Project Manager	<p>Person within a mission directorate who leads projects by coordinating with Agency officials, outside contractors, and internal and external oversight entities.</p> <ul style="list-style-type: none"> <li>• Assess the risks, feasibility, and technical requirements of their projects.</li> <li>• Develop operations and acquisition strategies.</li> <li>• Establish high-level requirements and success criteria.</li> <li>• Prepare plans, budgets, and schedules.</li> </ul>	Mission Directorate
Other administrative support personnel	<ul style="list-style-type: none"> <li>• Contract specialists perform similar duties as the CO, except the contract specialist does not have authority to enter into or terminate contracts.</li> <li>• Cost analysts perform a cost analysis review to evaluate any separate cost elements and profit or fee in a contractor's proposal to determine a fair and reasonable price or to determine cost realism.</li> <li>• Administrative support personnel perform data analysis, policy analysis, and acquisition support services.</li> </ul>	Office of Procurement

Source: NASA OIG presentation of Federal Acquisition Regulation and Agency information.

NASA's acquisition workforce operates from 15 offices located at NASA Centers and Agency facilities. The salaries of Office of Procurement personnel are paid through a combination of Office of Procurement funds, direct program/project funding, working capital funds for services rendered by the NASA Shared Services Center (NSSC), and reimbursable work funds for other governmental and

commercial services.<sup>5</sup> As of August 2019, approximately 70 percent of Office of Procurement personnel were funded by the Office and 30 percent through other sources—primarily program/project funds.<sup>6</sup> In addition, Office of Procurement staff consist of a combination of civil service employees (79 percent) who perform inherently governmental functions and contractors (21 percent) who offer a variety of support services.

## Training and Certifications

In 2005, the Office of Management and Budget's Office of Federal Procurement Policy established a requirement for Federal Acquisition Certification (FAC) programs for COs, CORs, program/project managers, and other contracting personnel at all civilian executive agencies.<sup>7</sup> The FAC is founded on five core competencies—education, training, experience, continuous learning, and development—that are considered essential for successful contracting. For all civilian executive agencies, the Federal Acquisition Institute Training Application System (FAITAS) is the official system of record for FAC programs. Agencies and individuals are responsible for maintaining certification supporting documentation for quality assurance purposes. All contracting professionals were required to be registered in FAITAS by January 1, 2014.<sup>8</sup> At NASA, the Chief Acquisition Officer is responsible for ensuring that the Agency's acquisition workforce is appropriately trained and certified to support its procurements and programs.<sup>9</sup> NASA's Acquisition Career Manager oversees the acquisition workforce training and certification programs on behalf of the Chief Acquisition Officer. Table 2 identifies NASA's requirements for its acquisition workforce to obtain FAC and the basic experience and continuous learning requirements. If continuous learning requirements are not met, the employee's certification will expire, and their appointment may be suspended or revoked until the requirement is met.

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<sup>5</sup> The NASA Shared Services Center performs financial management, human resources, information technology, procurement, and business support for NASA Centers. Congress established the NASA Working Capital Fund in February 2003 with the enactment of the fiscal year 2003 appropriations act (Pub. L. No. 108-7). The NASA Working Capital Fund is used to finance activities, services, equipment, information, and facilities for customers internal and external to NASA. A working capital fund is not a physical entity or organization, but rather a funding mechanism, such as a revolving fund, that finances certain organizations within NASA that operate like commercial businesses.

<sup>6</sup> The proportion of personnel funded by the Office of Procurement and other sources includes both Office of Procurement and Office of Small Business Programs personnel. The Office of Small Business Programs provides integration, policy, initiatives, and oversight to ensure compliance with laws and regulations to increase the Agency's small business industry base.

<sup>7</sup> The Office of Federal Procurement Policy in the Office of Management and Budget plays a central role in shaping the policies and practices federal agencies use to acquire goods and services they need to carry out their responsibilities. The Office was established by Congress in 1974 to provide overall direction for government-wide procurement policies, regulations, and procedures and to promote economy, efficiency, and effectiveness in acquisition processes. Office of Federal Procurement Policy, *Developing and Managing the Acquisition Workforce* (April 15, 2005). The Department of Defense is exempt from this requirement and has its own acquisition workforce certification program.

<sup>8</sup> Office of Federal Procurement Policy Memorandum, *Increasing Efficiencies in the Training, Development, and Management of the Acquisition Workforce* (September 3, 2013) required all contracting professionals to be registered in FAITAS by January 1, 2014. Extensions to implementation dates and exceptions to full utilization of FAITAS may be granted for unique agency circumstances and must be approved by the Office of Federal Procurement Policy in writing.

<sup>9</sup> The Services Acquisition Reform Act of 2003 (Pub. L. No. 108-136 § 1421) established the role of the Chief Acquisition Officer. At NASA, the Chief Acquisition Officer (the Chief Financial Officer) and the Deputy Chief Acquisition Officer (the Assistant Administrator for Procurement) work cooperatively to oversee NASA's acquisition workforce. The NASA Acquisition Career Manager is an appointed position that resides within the Office of Procurement.

**Table 2: Acquisition Workforce Certification Requirements Within a 2-year Period**

FAC Certification Type	Required Participants	Certification Level	Experience Requirement	Continuous Learning Requirement (in hours)
Contracting	<ul style="list-style-type: none"> <li>All warranted contracting officers regardless of series</li> <li>All General Schedule-1102 series employees<sup>a</sup></li> <li>Any contracting professional issued an unlimited warrant after October 1, 2014</li> </ul>	Level I	1 year	80
		Level II	3 years	80
		Level III	7 years	80
Contracting Officer's Representative	All CORs	Level II	1 year	40
Program/Project Manager	All program/project managers actively managing programs/projects that are deemed by their Center as highly visible or with life-cycle costs greater than \$250 million	Senior-level	4 years	80

Source: NASA OIG presentation of Federal Acquisition Institute and Agency information.

<sup>a</sup> The General Schedule classification and pay system, administered by the U.S. Office of Personnel Management, covers the majority of civilian, white-collar federal employees. The General Schedule-1102 series includes positions that manage, supervise, perform, or develop policies and procedures for professional work involving the procurement of supplies, services, construction, or research and development using formal advertising or negotiation procedures; the evaluation of contract price proposals; and the administration or termination and close out of contracts. The work requires knowledge of the legislation, regulations, and methods used in contracting and knowledge of business and industry practices, sources of supply, cost factors, and requirements characteristics.

## Acquisition Workforce Challenges

NASA has identified a variety of challenges to managing its acquisition workforce. In addition to factors largely outside of NASA’s control such as future budget levels and changes in program and mission priorities, NASA’s own mission-driven challenges such as unknown or emerging requirements and aggressive mission schedules carry over to the acquisition workforce. For example, the President’s directive to land humans on the moon by 2024—4 years ahead of NASA’s original plans—has led the Agency to procure key systems even as requirements are still evolving. This has resulted in an increased workload on the acquisition workforce and challenges adhering to the cost and schedule goals of system development. In addition, many acquisition challenges stem from the long-standing practice of Center procurement offices functioning autonomously. These practices have resulted in institutionalized inefficiencies such as redundant capabilities and contracts, inconsistent monetary thresholds for review by legal and policy offices, and lack of workforce flexibility. Furthermore, these inefficiencies contribute to long lead-times and low cooperation and collaboration of procurement and stakeholder leadership in acquisition decision making. Lastly, NASA faces an aging acquisition workforce where knowledge loss due to attrition is difficult to address given that there is an acquisition workforce shortage in the federal government.

## Realignment of Acquisition Workforce

In order to address these challenges, NASA has conducted a series of internal reviews and initiatives to move towards a more agile, mission-driven acquisition workforce. A 2015 Agency-wide Business Services Assessment found that the Office of Procurement received strong, positive customer feedback; however, high demand for acquisitions in combination with a low supply of contracting personnel supporting Center-specific contracts have resulted in long lead-times, under-utilized flexibilities, and redundant capabilities and contracts.<sup>10</sup> The Business Services Assessment also identified inconsistent monetary thresholds for review by legal and policy offices, low cooperation and collaboration of procurement and stakeholder leadership, and a lack of workforce flexibility as areas for improvement.

In 2017, in response to the Business Services Assessment, the Office of Procurement created the Acquisition Portfolio Assessment Team to assess all Agency contracts and identify redundant, recurring institutional- and program/project-specific contracts previously managed at the Center level. The team categorized recurring needs into Product Service Lines (PSL) so that the procurement process can move from a decentralized buying process to a centralized buying process under the direction of a buying team.<sup>11</sup> For example, PSLs used to maintain and operate the Centers include construction services, environmental compliance services, grounds maintenance services, and facility maintenance services, while program/project-specific PSLs include aircraft operations, engineering services, propellants, and safety and mission assurance services. Instead of each center and program/project issuing individual contracts to support their needs, the buying office will utilize their expertise in the PSL to determine the best strategy to streamline the procurement process to support the Agency's needs at a localized, regionalized, or centralized level.<sup>12</sup>

Following the Business Services Assessment and Acquisition Portfolio Assessment Team's findings, NASA leadership instructed the Office of Procurement to find opportunities to increase efficiencies. The Office of Procurement began efforts in 2017 to move toward a more interdependent model allowing the Agency to share capabilities among Centers and foster agility and flexibility with an enterprise-wide approach to procurement through the Mission Support Future Architecture Program (MAP). This transformation is expected to allow the Office of Procurement to leverage employees' skills for use across the Agency, creating an enterprise-wide workforce to meet evolving mission needs. Implementation of the initial phase of the MAP transformation began on October 1, 2019. The long-term goal is for the Office of Procurement to be a mixture of decentralized to fully centralized procurement support with each Center managing several PSLs for the entire Agency—a goal that will span multiple phases and is estimated to be fully operational by 2024. Figure 1 shows the PSL categories and the options for how a contract will be assigned for management by the Office of Procurement.

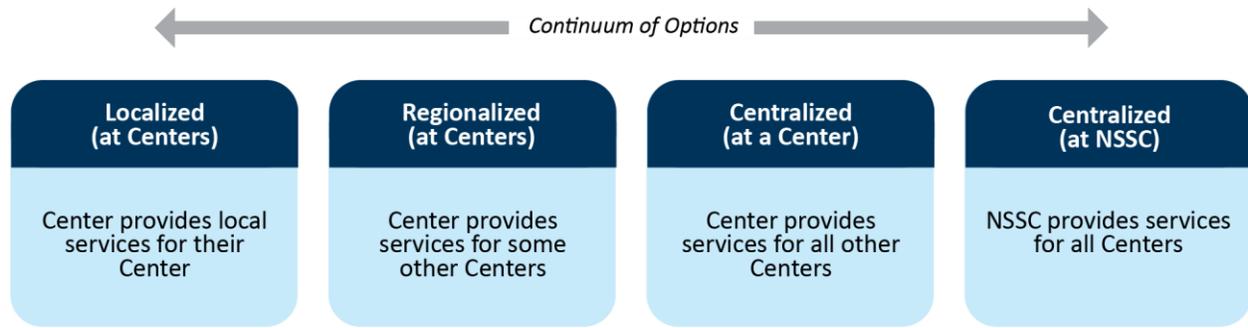
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<sup>10</sup> The Office of Procurement completed a Business Services Assessment in 2015, specifically reviewing: strategic sourcing; acquisition assignments; contract administration; evaluation process, policy and guidance; knowledge management; project management; and leadership. The foundational work under the Assessment transferred to MAP and the creation of product service lines.

<sup>11</sup> Each buying office in the Office of Procurement will be responsible for delivering procurement services for their assigned PSL per the chosen delivery model. In addition, each buying office will continue to procure items/services for the unique programs at their respective Center.

<sup>12</sup> In addition to the localized, regionalized, and centralized approach to PSLs, NASA also intends to outsource to contractors, partner with other federal agencies, and divest in certain PSLs.

**Figure 1: Buying Approaches for Product Service Lines**



**PRODUCT SERVICE LINES**

*Institutional*

- Architect and engineering services
- Acquisition support services/ audit support services
- Administrative services
- Communication services
- Construction
- Cooperative agreements
- Custodial services
- Environmental compliance and remediation
- Facilities operations and maintenance
- Financial support services
- Grounds maintenance

- Human capital support
- Information technology services
- Logistics
- Occupational health
- Office of Diversity and Equal Opportunity
- Project planning and control
- Protective services
- Small business innovation research/ small business technology transfer
- Subscriptions
- Utilities

*Program/project specific*

- Aircraft operations
- Engineering
- Propellants
- Safety and mission assurance

Source: NASA OIG presentation of NASA Office of Procurement information.

To address the need to modernize the NASA workforce and account for dynamic mission demands like landing humans on the Moon by 2024 and Mars in the 2030s, NASA’s Office of Chief Human Capital Officer established a protocol for implementing a new Agency-wide Strategic Workforce Plan in late 2018. NASA developed planning principles, as identified in Figure 2, for the 5-year Strategic Workforce Plan expected to be implemented in fiscal years 2021 through 2025. The Office of Procurement responded by developing its own Strategic Workforce Plan in accordance with Agency guidance.

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**Figure 2: NASA Strategic Workforce Planning Principles**



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Source: NASA OIG presentation of Office of Chief Human Capital Officer information.

The Office of Procurement intends to maximize resource capabilities through the MAP enterprise delivery model and use its new Strategic Workforce Plan to enable more effective and efficient acquisition of business solutions; prioritize recruitment/hiring, training and development; and promote retention initiatives.

# NASA'S PLANS TO REALIGN ITS ACQUISITION WORKFORCE ARE PROMISING BUT LACK KEY DATA TO ASSESS PROGRESS

To address major mission needs in the coming years, NASA is working to develop an agile acquisition workforce. In October 2019, NASA's Office of Procurement began implementing its enterprise-wide workforce transition and developed a Strategic Workforce Plan to meet future acquisition needs, mitigate the risks of a changing workforce, and more efficiently manage the acquisition workload. Overall, these plans appear to follow GAO best practices for acquisition management; however, additional data and performance metrics could improve data validity, help the Office of Procurement accurately assess capabilities of their staff and resources, increase visibility of workforce staffing needs and skill gaps, and inform management reporting.

## NASA's Strategic Approach Toward an Agile, Mission-Driven Acquisition Workforce Is in Line with Best Practices, but Implementation Is in Its Infancy

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### Realignment Follows GAO Best and Leading Practices in Acquisition Management

Historically, all NASA procurement actions and award decisions were made at the Center level, which resulted in every Center supporting redundant and duplicative contracts and instruments for similar purposes and increased administrative actions, number of personnel, and cost. To address this challenge, the Office of Procurement designed the MAP transformation plan and developed a Strategic Workforce Plan to realign the acquisition workforce to meet current and future contracting needs.<sup>13</sup> These initiatives are in line with best and leading practices in acquisition management identified by the GAO.<sup>14</sup> According to the GAO, federal agencies need to value and invest in their acquisition workforce, thinking strategically about recruiting, developing, and retaining talent. Specifically, agencies should (1) include acquisition officials in their human capital strategic planning process; (2) identify acquisition needs in their human capital plan; (3) conduct an acquisition workforce assessment to clearly define roles and responsibilities, performance measures, and appropriate workload and training; and (4) establish performance expectations and metrics for officials and managers. Based on the design of

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<sup>13</sup> The Office of Procurement and Office of Small Business Programs developed a project plan outlining the MAP transformation process. The plan was approved by NASA's Mission Support Council on August 6, 2019.

<sup>14</sup> GAO's best and leading practices in acquisition management is one of GAO's key issues, which provides information about GAO's work on a range of issues facing the nation and highlights some of its most relevant reports.

its strategic initiatives, NASA is well-positioned to accomplish its goal of moving toward an agile, mission-driven workforce.

By including the Office of Procurement in the strategic workforce planning process, NASA succeeded in incorporating acquisition officials in the Agency-wide Strategic Workforce Plan. NASA addressed the need to identify acquisition needs and conduct an acquisition workforce assessment through an in-depth questionnaire to Office of Procurement leadership that highlighted the Agency's workforce risks. These risks include an aging workforce, knowledge loss due to attrition, acquisition workforce shortage at the federal level, unknown future budget levels, unknown and/or emerging requirements, aggressive mission schedules, and administration and priority changes.

Once the risks were identified, the Office of Procurement developed strategies for recruiting, retaining, and developing acquisition staff as well as defining the necessary roles and responsibilities, performance measures, and appropriate workload. The Office of Procurement's Strategic Workforce Plan details its intentions over a 5-year period to divest permanent employees who do not perform CO or contract specialist functions, invest in contractor and project-based employees, employ recruitment and retention initiatives to maintain a mission-critical workforce, realign the existing workforce into PSLs, and implement standardized processes and procedures as an enterprise for increased efficiencies. To hire and maintain needed support, the Office of Procurement intends to utilize the Agency's Direct Hire Authority, the internship or the federal Pathways Program, and other incentives like skill development, mentoring, on the job training, and certification training.<sup>15</sup> Finally, NASA plans to use a performance metrics dashboard for Headquarters to establish performance expectations and metrics for acquisition officials.

## **Realignment of NASA's Acquisition Workforce to Better Meet Mission Needs Is in Its Infancy and Faces Challenges**

While NASA's acquisition workforce realignment plans conform to GAO's best practices and appear to better position the Agency to accomplish its goal of moving toward an agile, mission-driven workforce, the Agency's efforts are too early in their implementation to assess their success. Office of Procurement officials estimate that full implementation will take 5 years. The development phase of MAP was approved in late September 2019, and implementation began on October 1, 2019. However, the overall MAP strategy is not expected to be fully implemented until June 2021, and the PSLs are not anticipated to be fully operational until mid-2022, with the transition of the remaining open contracts to their streamlined PSL contracts not occurring until 2024. In recent years, however, NASA has had limited success implementing similar efforts to reorganize Agency-wide operations. For example, in March 2017 we reported that after 4 years NASA still had not made concrete decisions about its technical capabilities following the results of NASA's Technical Capabilities Assessment Team and the Capability Leadership Model that reviewed the investment, consolidation, and elimination of Agency technical capabilities.<sup>16</sup> Likewise, in October 2017 we reported that after over 3 years the Chief Information Officer had not made sufficient progress completing the IT Business Services Assessment due to the

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<sup>15</sup> Title 5 U.S.C. 3304, Direct Hire Authority, provides federal agencies with the authority to appoint candidates directly, without use of standard hiring procedures to jobs with a severe shortage of candidates or critical hiring needs. The Pathways Program allows for hiring of Presidential Management Fellows, recent graduates from college or vocational schools, and interns.

<sup>16</sup> NASA OIG, *NASA's Efforts to "Rightsize" its Workforce, Facilities, and Other Supporting Assets* (IG-17-015, March 21, 2017).

decentralized management structure, lack of insight into Agency-wide IT spending, and limited authority of the Chief Information Officer.<sup>17</sup>

As the Office of Procurement moves forward with implementation, it faces several challenges. For example, according to Office of Procurement officials, for those PSLs with complex technical requirements, such as engineering services, it will be difficult to move current work under a Center-specific contract to a contract managed by a centralized, regionalized, or localized buying office servicing multiple Centers. These services are often performed by staff with substantial technical and institutional expertise that is based on the unique needs of the individual Centers. Shifting work from local contracts to enterprise or regional contracts risks the loss of critical expertise. More broadly, another challenge will be the ability of the Office of Procurement to adapt to the significant cultural change with the transformation from a decentralized, Center-centric focus to an enterprise-wide acquisition workforce. There is a risk that staff will not embrace the enterprise-wide approach at the same pace as leadership, which may result in the old processes continuing or higher attrition rates at some Centers. Streamlining institutional procurement actions will be an adjustment for procurement staff, and early resistance to the plan has already surfaced. For example, the Office of Procurement surveyed their staff following the conclusion of a MAP transition training session in July 2019, and staff expressed concerns about contract processing delays caused by the additional reviews needed to award contracts, supporting work for other Centers geographically distanced, and too much change taking place at once. The Office of Procurement has attempted to mitigate these concerns by conducting an education campaign to inform the staff of the benefits of change and engage them in the design and implementation.

## **NASA Lacks Enterprise Workforce Data and Performance Metrics**

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Currently, NASA does not collect enterprise-wide acquisition workforce workload or performance data. Since the Centers have historically operated autonomously, each Center had its own unique practices of managing workload and measuring performance. Without enterprise acquisition workforce performance metrics and a system of records linking the assignment of personnel to contracts, the Office of Procurement is limited in its ability to monitor workforce realignment efforts.

In our review of acquisition data across the Agency, we found that acquisition workforce performance metrics are gathered inconsistently and are collected using different processes across each Center. The Office of Procurement identified 45 different performance metrics collected at the Centers together with a mix of system-generated and manually collected performance data. Wide variances in the types of data and processes used to gather the metrics results in the Office of Procurement's inability to measure workforce performance consistently across the entire Agency. For example, Centers are inconsistent in their collection of metrics on procurement action lead times and contract closeout time. One reason for the inconsistencies is that some metrics are unique to a single Center, such as voucher processing timeliness related to purchase cards, which is overseen by the NASA Shared Services Center for the entire Agency.

The Office of Procurement has acknowledged its data limitations and has taken steps to develop an enterprise-wide system for measuring workload and performance. Specifically, MAP includes an effort

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<sup>17</sup> NASA OIG, *NASA's Efforts to Improve the Agency's Information Technology Governance* (IG-18-002, October 19, 2017).

to develop a performance metrics dashboard used by Headquarters and all the Centers, allowing consistent measurement of procurement workload data in the areas of personnel, procurement, process, policy, and customer satisfaction. These metrics are streamlined in comparison to the 45 different metrics currently collected at the Centers to focus on key areas applicable to the Office of Procurement as a whole. To this end, the dashboard is designed to manage workforce challenges by monitoring, for example, procurement lead-times by contract type and dollar value, the number of personnel performing contract work at a Center, and the rate at which procurement assignments are aligned into PSLs. The dashboard will be comprised of data pulled from the Federal Procurement Data System-Next Generation, Procurement for Public Sector, and other data systems.<sup>18</sup>

The dashboard will be implemented using a three-tiered approach, with the first iteration including a subset of procurement data. The second iteration will be expanded to include policy and process data, while the third and final iteration will include personnel data. The Office of Procurement initially planned for the dashboard to be fully operational by October 2020; however, this date will likely slip due to a reduction in contractor support for the development team, which resulted in a temporary work stoppage and an undetermined delay in schedule as of July 2020.

While still early in its implementation, the development of the performance metrics dashboard appears to better position the Agency to collect the enterprise-wide data needed to make strategic decisions regarding its acquisition workforce and monitor the progress of workforce realignment efforts. However, in our judgment, one key set of data is missing from the performance metrics dashboard—the ability to see at an enterprise level what contracts individual members of the acquisition workforce are working on at any point in time. A major challenge to gathering this data is that the CORs and program/project managers administratively reside outside of the Office of Procurement. As such, assignment of CORs and program/project managers to contracts would require manual collection of data at the Center level with continuous updates as assignments change. Without tracking the assignment of each contract to a CO, COR, and program/project manager, it will be difficult for the Office of Procurement to monitor workload, labor hours, and the skill level of the staff managing the contracts. In addition, the Office of Procurement does not have an accurate picture of who comprises the acquisition workforce and whether they are certified as required without tracking contract assignments. We believe that the ability to link the acquisition workforce to specific contract assignments is essential to the Office of Procurement's efforts to monitor and measure workforce performance and establish a baseline for operations at an enterprise level.

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<sup>18</sup> Federal Procurement Data System-Next Generation is the source for government contract data reports with an estimated value over \$10,000. Procurement for Public Sector is a NASA enterprise contract writing system. We did not assess the reliability of these data systems as part of our review.

# NASA'S ACQUISITION WORKFORCE MET TRAINING REQUIREMENTS BUT RECORD KEEPING SYSTEMS COULD BE IMPROVED

We found that NASA policy generally aligns with federal requirements for certification and training of the acquisition workforce. Further, 95 percent of NASA's certified acquisition workforce met continuous learning requirements needed to maintain their certification in the reporting periods we evaluated. However, NASA relies on multiple systems and stakeholders to manage these certification programs, reducing their ability to fully validate the accuracy and completeness of acquisition workforce certification and training. This resulted in NASA failing to identify about 200 CORs who did not meet their required training in the reporting period, 24 of whom were continuing to work on contract actions.

## NASA's Acquisition Workforce Complies with Federal Training and Certifications Requirements

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### NASA's Training and Certification Policies for Key Acquisition Positions Align with Federal Requirements

The Office of Procurement maintains the NASA Procurement Career Development and Training Program Policy Handbook that provides general roles and responsibilities for NASA's acquisition workforce.<sup>19</sup> Specific guidance for training and certification is limited to contracting certification program participants, including all COs, the GS-1102 acquisition workforce, and any contracting professional issued an unlimited warrant after October 1, 2014. The handbook complies with acquisition reforms and requirements directed by the Office of Federal Procurement Policy. To support these requirements, the handbook includes specific education, training, and experience requirements needed to obtain a certification in contracting. Further, requirements for warrant holders are outlined for those with warrant authority.

To address the requirements for certified CORs, NSSC and the NASA Federal Acquisition Regulation Supplement provide COR training and certification guidance. NSSC guidance includes frequently asked questions and answers sections on its official website. The information provided is comprehensive, allowing a user to determine requirements for becoming a COR and obtaining and maintaining certification. The NASA Federal Acquisition Regulation Supplement concisely summarizes these

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<sup>19</sup> Office of Procurement, *NASA Procurement Career Development and Training Program Policy Handbook* (October 18, 2019).

requirements.<sup>20</sup> Combined, these resources meet the intent of Office of Federal Procurement Policy requirements.

Lastly, the requirements for certified program/project managers are addressed by NASA's Academy of Program/Project & Engineering Leadership Knowledge Services. The Academy is a long-standing internal research organization designed as a knowledge resource for NASA's technical workforce. Prior to program/project manager certification implementation at NASA, the Academy developed and administered a project management competency model to develop NASA project managers. In 2009, NASA submitted a request to the Federal Acquisition Institute to utilize this existing competency model to meet certification requirements.<sup>21</sup> NASA provided an implementation plan, and the Federal Acquisition Institute endorsed the plan as meeting requirements. As a result, the Office of Chief Engineer is responsible for oversight and management of developing program/project manager participants and managing their certification and training while the Office of Procurement serves as the certifying official. Centers nominate individuals actively managing programs/projects that are deemed highly visible or with life-cycle costs greater than \$250 million for certification, and the Office of Procurement works with the Office of Chief Engineer to ensure all program/project managers are certified in accordance with NASA requirements.

## Most of NASA's Acquisition Workforce Met Training Requirements

We found that 95 percent of the acquisition workforce recorded the required number of continuous learning hours to maintain their federal acquisition certifications during the reporting periods we evaluated. We reviewed data provided by the Office of Procurement to determine whether the certified acquisition workforce met the continuous learning requirements needed to maintain their certification. NASA had 667 employees certified in contracting, 3,571 certified CORs, and 151 certified program/project managers.<sup>22</sup> Based on training completion records self-certified by these certification holders, 203 CORs, or approximately 6 percent, did not meet continuous learning requirements needed to maintain their certification for the 2-year period ending October 2019 that resulted in their certifications expiring. All employees certified in contracting and certified program/project managers met their learning requirements.

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<sup>20</sup> NASA Federal Acquisition Regulation Supplement 1801.604-70, *Federal Acquisition Certification for Contracting Officer's Representatives Requirements*.

<sup>21</sup> Established in 1976 under the Office of Federal Procurement Policy Act, the Federal Acquisition Institute has been charged with fostering and promoting the development of a federal acquisition workforce. The Institute facilitates and promotes career development and strategic human capital management for the acquisition workforce.

<sup>22</sup> These numbers are based on the FAC-certified acquisition workforce at the time of the 2-year continuous learning point reporting cycles ending in October 2019 and April 2020. For certification in contracting employees and CORs, this was October 31, 2019. For program/project managers, participants are split between two reporting cycles. We reviewed only certification holders from the cycle ending April 30, 2020, which included 84 of the 151 participants.

# Record Keeping System Deficiencies Led to CORs Performing Work Despite Lapsed Certifications

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## Migration to FAITAS Not Complete

Office of Federal Procurement Policy guidance required each civilian executive agency's acquisition workforce to register in FAITAS by January 2014. FAITAS is a government-wide system that manages workforce certification requirements, provides access to training, and allows users to input continuous learning courses taken outside of FAITAS.

In July 2015, NASA obtained a waiver from the Office of Federal Procurement Policy to continue using its own learning management system because of initial concerns over information security given the limited control the Agency would have over a non-NASA system and concerns over FAITAS' ability to provide mandatory reporting requirements for acquisition workforce data to the Office of Personnel Management. The Office of the Chief Information Officer identified risk mitigation plans and provided approval to use the FAITAS platform in January 2018. In November 2019, NASA began the transition to FAITAS specifically for its certification in contracting workforce and will use FAITAS to manage the 2019-2021 continuous learning cycle. However, the much larger population of certified CORs continue to use NASA's learning management system due to resistance from CORs and their supervisors, who generally reside outside of the Office of Procurement, to create profiles in FAITAS and document their training in two separate systems. The Office of Procurement plans to move CORs to FAITAS by the end of calendar year 2020. According to Office of Procurement officials, this date may slip due to the size of NASA's COR workforce and the requirement for all CORs and their supervisors to create FAITAS user profiles prior to implementation.

## NASA's Learning Management System Did Not Accurately Reflect COR Certifications

The Office of Procurement's current reliance on NSSC's management of the Agency's internal learning management systems hinders its ability to provide effective oversight and ensure compliance with training requirements. During closeout of the certification in contracting and COR 2-year continuous learning period ending in October 2019, the Office of Procurement relied on the NSSC to compile learning hour reports summarizing total hours earned by each certification holder and modify certification holder profiles to update FAC eligibility. Certification holders tracked completion of their training hours by registering and completing courses in NASA's learning management system. For courses completed outside of the learning management system, employees, training coordinators, and the NSSC worked together to manually record training completion in the system. The NSSC combined the hours from the learning management system and the external courses in their regular summary reports sent to FAC program stakeholders. In the end, we found that 203 CORs did not meet their required continuous learning hours for the 2-year reporting period ending October 2019; however, NSSC failed to indicate in its system that 178 of the 203 CORs were no longer certified. The Office of Procurement was not aware of this deficiency until notified by the Office of Inspector General in June 2020 as part of this audit. After confirming our analysis, the Office of Procurement identified the cause as the NSSC's failure to unselect a box marking the employees as certified CORs and implemented immediate corrective action by removing certification status for the additional 178 of 203 CORs who did not meet learning requirements.

## **Acquisition Personnel Who Did Not Complete Required Training Continued Performing Acquisition Functions**

Despite the requirement for all NASA CORs to maintain certification, at least 24 of 203 CORs continued to work on contracts after their certifications expired. We asked the Office of Procurement to identify contracts assigned to CORs after their lapse in certification in October 2019. Because the Office of Procurement does not maintain a system that tracks CORs to assigned contracts, officials sent a survey to the 203 CORs to ask them if they worked on any contracts after their certification lapsed. Of the 203 CORs surveyed, 118 submitted a response with 24 indicating that they continued to work on contracts after their certification lapsed.<sup>23</sup> Even after the Office of Procurement became aware of CORs working on contracts without maintaining certification requirements, at least 24 remained in their roles due to the time it would take to find a suitable replacement COR with the required experience to provide effective contractor oversight. In total, at least 27 contracts with current obligations of almost \$11 billion had an assigned COR whose certification had lapsed but who continued performing COR functions. This represents a significant breakdown in an internal control to ensure that certified contracting officials support NASA's procurement process.

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<sup>23</sup> The Office of Procurement surveyed the 203 CORs whose certification lapsed in October 2019 to identify whether they continued to work on contracts. Of the surveyed CORs, 118 responded, 60 did not respond, and 25 no longer have active NASA email accounts. The number of CORs assigned to contracts after their lapse in certification is likely understated due to the survey response rate.

# CONCLUSION

NASA's acquisition workforce plays a key role in ensuring the Agency's success in accomplishing its mission, including returning astronauts to the Moon by 2024. A key to that success is the Agency's plans to realign its acquisition workforce under MAP to reduce redundancies and gain efficiencies. The Office of Procurement's new Strategic Workforce Plan is well designed to address challenges in maintaining a workforce capable of responding to current and future contracting needs. However, implementation of the MAP and the Strategic Workforce Plan are in their infancy, and one of the key efforts to realign acquisition functions into PSLs is not expected to be complete until 2024. Furthermore, plans to develop a performance metrics dashboard under the MAP transformation to measure enterprise workforce performance and capabilities lacks data linking assignments of COs, CORs, and program/project managers to their contracts, hindering the Agency's ability to monitor the acquisition workload, labor hours, and the skill level of the staff managing the contracts.

Standardized training and certification requirements allow for flexibility of the acquisition workforce to work cross-functionally across multiple Centers as designed with the MAP transformation efforts. Although NASA's acquisition workforce meets federal requirements for certification and training, the Agency has been slow to transition to the use of FAITAS for documenting training and certification requirements. Instead, NASA has relied on multiple systems and stakeholders to manage the certification programs, hindering effective oversight of training and certification completion.

# RECOMMENDATIONS, MANAGEMENT'S RESPONSE, AND OUR EVALUATION

To help ensure the success of the MAP transformation, we recommend NASA's Assistant Administrator for Procurement undertake the following actions:

1. Finalize and fully implement the performance metrics dashboard to measure acquisition performance.
2. Document contract assignments to COs, CORs, and program/project managers in a centralized system for inclusion in the performance metrics dashboard.

To comply with the Office of Federal Procurement Policy requirement to utilize FAITAS to manage acquisition related training and certifications and to streamline the process of monitoring and reporting continuous learning for FAC holders, we recommend NASA's Acting Chief Financial Officer undertake the following action:

3. Ensure all certified contracting and COR program participants utilize FAITAS to record their certifications and continuous learning requirements by an established deadline.

To ensure that CORs performing on contracts have active certifications, we recommend NASA's Assistant Administrator for Procurement undertake the following action:

4. Take action to ensure that active CORs that have not met continuous learning requirements are removed from their COR position in a timely manner.

We provided a draft of this report to NASA management, who concurred or partially concurred with our recommendations. We consider management's comments responsive to Recommendations 1, 3, and 4; therefore, those recommendations are resolved and will be closed upon verification and completion of the proposed corrective actions. Management partially concurred with Recommendation 2, stating that it cannot link program/project managers to their contract assignments because the Office of Procurement lacks an existing data source. Nonetheless, we believe that the ability to link contract assignments to acquisition workforce personnel is essential to the Office of Procurement's efforts to monitor and measure workforce performance and establish a baseline for operations at an enterprise level. As such, this recommendation will remain unresolved pending further discussions with Agency officials.

Management's comments are reproduced in Appendix B. Technical comments provided by management and revisions to address them have been incorporated as appropriate.

Major contributors to this report include Ridge Bowman, Space Operations Director; Deanna Lee, Project Manager; Daniel Fenzau; Rachel Pierre; Emily Bond; Sarah McGrath; Shari Bergstein; and Cody Bryant.

If you have questions about this report or wish to comment on the quality or usefulness of this report, contact Laurence Hawkins, Audit Operations and Quality Assurance Director, at 202-358-1543 or [laurence.b.hawkins@nasa.gov](mailto:laurence.b.hawkins@nasa.gov).

Paul K. Martin  
Inspector General

# APPENDIX A: SCOPE AND METHODOLOGY

We performed this audit from March 2020 through October 2020 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 objectives.

Our overall objective was to examine the readiness of NASA's acquisition workforce to respond to current and future contracting needs. The scope of this audit was strategic workforce planning, training, and certification of NASA's acquisition workforce. To answer our objective and gain an understanding of the Agency's management of its acquisition workforce, we interviewed Office of Procurement personnel responsible for strategic workforce planning, MAP restructuring, and training policy and oversight. We also interviewed personnel from the Office of the Chief Human Capital Officer to better understand the Agency's strategic workforce planning efforts and Office of the General Counsel's Contracts and Acquisition Integrity Law Practice Group to identify acquisition risk areas. We interviewed personnel from the NSSC and training coordinators from Headquarters and Centers regarding the NASA FAC program. Lastly, we interviewed a selection of Center Procurement Officers, COs, CORs, and program/project managers to obtain their viewpoints on the acquisition process, strengths, and areas for improvement.

In addition, we reviewed and analyzed key documents addressing the restructuring of the Office of Procurement, including its 2015 Business Services Assessment, 2019 MAP Transformation Project Plan, and 5-year Strategic Workforce Plan for fiscal years 2021 through 2025. To assess the controls around training and certifications, we analyzed the NASA Procurement Career Development and Training Program Policy Handbook as well as training and certification guidance obtained from the NSSC and NASA's Academy of Program/Project & Engineering Leadership Knowledge Services websites.

## Assessment of Data Reliability

We relied upon computer-processed data as part of performing this audit. We reviewed and analyzed training data from NASA's learning management system for the period October 1, 2017, through October 31, 2019. We assessed the reliability of the data by (1) performing testing to identify incomplete, duplicate, and inaccurate records and (2) interviewing Agency officials knowledgeable about the data. We compared summarized FAC training data provided by the Office of Procurement to a sample of FAC learning reports provided by the NSSC. Based on interviews with the data owners and the results of our comparison, we determined the data were sufficiently reliable for the purposes of this report.

## Review of Internal Controls

We performed an assessment of internal controls associated with NASA's acquisition workforce. The control weaknesses we identified are discussed in this report. Our recommendations, if implemented, should correct the identified control weaknesses. We specifically reviewed the following documentation:

- NASA Federal Acquisition Regulation Supplement 1801.604-70, *Federal Acquisition Certification for Contracting Officer's Representatives Requirements* (September 28, 2015)
- NASA Policy Directive 1000.5B, *Policy for NASA Acquisition* (February 1, 2017)
- NASA Procurement Information Circular 18-01F, *Strategic Approach to Acquisition Strategies by Institutional Product Service Lines* (October 1, 2019)
- *NASA Procurement Career Development and Training Program Handbook* (October 18, 2019)

## Prior Coverage

During the last 5 years, the NASA Office of Inspector General and the GAO have issued 13 reports of significant relevance to the subject of this report. Unrestricted reports can be accessed at <http://oig.nasa.gov/audits/reports> and <http://www.gao.gov>, respectively.

### ***NASA Office of Inspector General***

*2019 Report on NASA's Top Management and Performance Challenges* (November 13, 2019)

*NASA's Engineering and Technical Services Contracts* (IG-19-014, March 26, 2019)

*2018 Report on NASA's Top Management and Performance Challenges* (November 15, 2018)

*NASA's 2017 Top Management and Performance Challenges* (November 6, 2017)

*NASA's Efforts to Improve the Agency's Information Technology Governance* (IG-18-002, October 19, 2017)

*NASA's Efforts to "Rightsize" its Workforce, Facilities, and Other Supporting Assets* (IG-17-015, March 21, 2017)

*2016 Report on NASA's Top Management and Performance Challenges* (November 15, 2016)

*2015 Report on NASA's Top Management and Performance Challenges* (November 5, 2015)

### ***Government Accountability Office***

*Defense Acquisition Workforce: DOD Increased Use of Human Capital Flexibilities but Could Improve Monitoring* (GAO-19-509, August 15, 2019)

*High-Risk Series: Substantial Efforts Needed to Achieve Greater Progress on High-Risk Areas* (GAO-19-157SP, March 6, 2019)

*NASA Information Technology: Urgent Action Needed to Address Significant Management and Cybersecurity Weaknesses* (GAO-18-337, May 22, 2018)

*High-Risk Series: Progress on Many High-Risk Areas, While Substantial Efforts Needed on Others* (GAO-17-317, February 15, 2017)

*High-Risk Series: Key Actions to Make Progress Addressing High-Risk Issues* (GAO-16-480R, April 25, 2016)

# APPENDIX B: MANAGEMENT'S COMMENTS

National Aeronautics and  
Space Administration

**Headquarters**  
Washington, DC 20546-0001



Reply to Attn of: Office of Procurement

October 16, 2020

TO: Assistant Inspector General for Audits  
FROM: Assistant Administrator for Procurement  
SUBJECT: Agency Response to OIG Draft Report, "NASA's Management of its Acquisition Workforce" (A-20-004-00)

NASA appreciates the opportunity to review and comment on the Office of Inspector General (OIG) draft report entitled, "NASA's Management of its Acquisition Workforce" (A-20-004-00), dated September 23, 2020.

In the draft report, the OIG makes three recommendations to the Office of Procurement (OP) and one recommendation to the Chief Financial Officer intended to help ensure the readiness of NASA's acquisition workforce to respond to current and future contracting needs.

Specifically, the OIG recommends the following:

To help ensure the success of the MAP transformation, the OIG recommend NASA's Assistant Administrator for Procurement:

**Recommendation 1:** Finalize and fully implement the performance metrics dashboard to measure acquisition performance.

**Management's Response:** NASA concurs with this recommendation.

In October 2020, NASA will roll out Phase 1 of the Metrics Dashboard. This phase will include procurement metrics. Phase 2 roll out is planned for the 2<sup>nd</sup> quarter of FY 2021 and will include process and policy metrics. Phase 3 is planned for the 4<sup>th</sup> quarter of FY 2021 and will include people/workforce metrics.

**Estimated Completion Date:** October 15, 2021.

**Recommendation 2:** Document contract assignments to COs, CORs, and program/project managers in a centralized system for inclusion in the performance metrics dashboard.

**Management's Response:** NASA partially concurs with this recommendation.

Contract assignments for Contracting Officers (COs) and Contracting Officer Representatives (CORs) can be centralized on the OP performance metrics dashboard; program/project manager assignments cannot.

CO assignments are currently captured in other systems such as the Federal Procurement Data System (FPDS) and System Applications and Products (SAP), NASA's financial system of record. This data will be incorporated in the performance metrics dashboard during phase 3.

COR contract assignments will transition from a form maintained in individual contract files to a SharePoint environment to assist with tracking. COR information will be incorporated into the performance metrics dashboard in FY22.

The Office of the Chief Engineer tracks all Federal Acquisition Certification in Program and Project Management (FAC P/PM) for the Agency and, with the assistance of the Centers, associates each certified program and project manager to the project/program they lead. PPMs are not captured at the contract level in any system of record at the Agency. There is no PPM data source for the OP performance metrics dashboard.

**Estimated Completion Date:** December 1, 2022.

To comply with the Office of Federal Procurement Policy requirement to utilize the Federal Acquisition Institute Training Application System (FAITAS) to manage acquisition related training and certifications and to streamline the process of monitoring and reporting continuous learning for FAC holders, the OIG recommends NASA's Chief Financial Officer:

**Recommendation 3:** Ensure all certified contracting and COR program participants utilize FAITAS to record their certifications and continuous learning requirements by an established deadline.

**Management's Response:** NASA concurs with this recommendation.

NASA has transitioned the contracting workforce to FAITAS which will serve as the system of record for acquisition training and certification. Certified CORs and their supervisors, who must approve training and continuous learning in the system, have been invited to voluntarily create FAITAS accounts.

NASA's Chief Financial Officer (and Chief Acquisition Officer) and the NASA Assistant Administrator for Procurement will immediately issue a joint memo requiring all remaining certified CORs to create FAITAS accounts in order to serve as a NASA COR. FAITAS utilization will be mandatory by February 1, 2021.

The NASA Acquisition Career Manager will utilize Office of Procurement SharePoint for COR tracking information that will be developed by the 2<sup>nd</sup> quarter of FY22 in conjunction with FAITAS reports to ensure that all active CORs and contracting workforce members have FAITAS accounts.

**Estimated Completion Date:** February 1, 2021.

To ensure that the COR is performing on contracts have active certifications, the OIG recommends NASA's Assistant Administrator for Procurement:

**Recommendation 4:** Take action to ensure that active CORs that have not met continuous learning requirements are removed from their COR position in a timely manner.

**Management's Response:** NASA concurs with this recommendation.

A COR Handbook will be developed that will detail FAC COR processes to include continuous learning, maintaining certification currency, and timelines for replacement when required.

**Estimated Completion Date:** January 31, 2022.

We have reviewed the draft report for information that should not be publicly released. As a result of this review, we have not identified any information that should not be publicly released.

Once again, thank you for the opportunity to review and comment on the subject draft report. If you have any questions or require additional information regarding this response, please contact Cheryl Robertson on (202) 358-0067.

WILLIAM  
ROETS

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for  
Monica Y. Manning  
Assistant Administrator  
Office of Procurement

STEPHEN  
SHINN

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Date: 2020.10.16  
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Steve Shinn  
Chief Financial Officer (Acting)

# APPENDIX C: REPORT DISTRIBUTION

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## National Aeronautics and Space Administration

Administrator  
Deputy Administrator  
Associate Administrator  
Chief of Staff  
Acting Chief Financial Officer  
Associate Administrator for Mission Support Directorate  
Assistant Administrator for Procurement

## Non-NASA Organizations and Individuals

Office of Management and Budget  
Deputy Associate Director, Energy and Space Programs Division  
Government Accountability Office  
Managing Director, Contracting and National Security Acquisitions

## Congressional Committees and Subcommittees, Chairman and Ranking Member

Senate Committee on Appropriations  
Subcommittee on Commerce, Justice, Science, and Related Agencies  
Senate Committee on Commerce, Science, and Transportation  
Subcommittee on Aviation and Space  
Senate Committee on Homeland Security and Governmental Affairs  
House Committee on Appropriations  
Subcommittee on Commerce, Justice, Science, and Related Agencies  
House Committee on Oversight and Reform  
Subcommittee on Government Operations  
House Committee on Science, Space, and Technology  
Subcommittee on Investigations and Oversight  
Subcommittee on Space and Aeronautics

(Assignment No. A-20-004-00)