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CHALLENGE CORPORATION

UNITED STATES OF AMERICA

Millennium Challenge Corporation – CPARS Implementation

Challenges to Improving Contractor Past Performance Information in a Small Agency

Challenges of CPARS

- Difficulty of workload and priority balancing
  - Given the extensive workload of standard pre-award and post-award duties
- All small agency CORs perform the role as one of many collateral duties
- Extensive timeline makes rapidly completing a CPAR difficult
  - Including 30 day contractor response time
- Access/workflow – Complete documentation inside or outside of CPARS?
- Differences for A&E contracts – ACASS use

MCC's Situation - Background

- Contracts and Grants Management Division (CGM) has 20 Staff
  - Half the staff are contractors
- Contractors not allowed to access CPARS
  - Additional burden for MCC Federal employees
- Inability of Focal Point, Reviewing Official and Assessing Official to serve multiple roles
  - Difficulty in assigning responsibilities without causing overlap
- Assigning CORs as AORs in the system poses its own problem
  - Passwords/logins hard to remember given collateral duty nature of the task

MCC Plan of Action

- All contracting officers are Feds, so assignment of duties was as follows:
  - Focal Point – CGM Procurement Analyst, runs auto-register once per month and assigns contracts
  - Assessing Official – CGM Contracting Officer
    - Based on standard workload assignment of customer base and practice area
  - Reviewing Official – MCC Senior Procurement Executive
- Implementation required extensive outreach

MCC Outreach

- Modified existing DoD CPARS training
  - Truncated and removed DoD-specific issues or other issues and topics not relevant to MCC (e.g., major systems type CPARS evaluations)

- Gave nine two-hour training sessions
  - Open to anyone in the agency
  - Targeted toward CORs and PMs (equivalent to FAC-COR Level I)

- Made available forms, quick guide, and training briefing on agency SharePoint sites

Implementation Process

- Monthly report run for auto-registering contracts
  - Assigned to the applicable Assessing Official
- CPAR coupled with Option Exercises
  - Makes more simple to track
- Program office develops a draft CPAR before the option exercise, continue to work in-process CPAR from there
- Periodic reports using existing CPARS reporting tools provide status on due and overdue assessments
- Continue to encourage CORs to utilize CPARS as opposed to other in-house form so that notification emails are received

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Challenges Remain

- New and more robust password requirements introduced in FY12 have been immense source of frustration.
  - Many users reset their passwords every time they use the system because passwords are too difficult to remember
- Working CPAR into option exercise has helped
  - Not optimal as extended timeline (30 days for contractor response) means that it takes longer than the option exercise modification
- Inability to rate subcontractors another source of frustration
  - Many program office personnel wish to file separate evaluations on subcontractors despite the Government's lack of privity and CPAR rules against it.
- Limited CPARS resources
  - Contract Specialists that are contractors cannot access the system

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Future Plans

- Develop SharePoint workflow using InfoPath
  - Allows program office personnel to submit the evaluations for review and approval by CGM Assessing Officials
- Make MCC-specific versions of FAQs
  - Modified versions of those posted on CPARS websites
  - MCC specific issues
- Continue to track and reconcile backlog of due and overdue evaluations

Lessons Learned

- **PRIORITIZE:** Focus on most recent actions and high dollar value actions first
  - They have the bigger and more important impact on providing valuable information to future source selections
- Be realistic – given limited staff of small agencies, seek to continually improve process
  - 100% compliance is not likely to be achievable, but improving compliance is
- Access is biggest challenge
  - Inability to use MCC CGM's mixed workforce
  - Inability to keep up with difficult password requirements
  - Because of access issues, doing the work within CPARS' may not be feasible, so alternatives such as SharePoint workflows may be worth exploring

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