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AN ANALYSIS OF ARMY CONTRACT ADMINISTRATION WITH REGARD TO CONTRACTING OFFICER'S REPRESENTATIVES

September 2016

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TO CONTRACTING OFFICER'S REPRESENTATIVES**

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ABSTRACT

This research project examines Army contract administration procedures in the Continental United States (CONUS) and Outside Continental United States (OCONUS) performed by Contracting Officer's Representatives (CORs) for service contracts. We analyze COR roles, responsibilities, education/training, communication, staff levels, oversight, and leadership support by comparing and contrasting Army COR contract administration processes from a CONUS and OCONUS perspective. The results inform Army Contracting leadership about differences and discrepancies that exist in the training of CORs and in the processes followed.

Using regulatory documents, audit reports, and interviews with CONUS and OCONUS CORs and supervisors, leaders, and commanders of CORs, we found gaps and challenges that affect the completion of COR duties relating to Army service contracts. We identified five common COR issues that need to be addressed: education/training, communication, staff levels, oversight, and leadership support. We found that COR training differs in CONUS and OCONUS environments. Additionally, lessons learned revealed that COR training remains inadequate, communication among contracting personnel and CORs requires improvement, staff levels need to be increased to support contract administration, managers nominate CORs who lack technical knowledge and experience, and commanders and leaders neither understand the requirements needed to support contract administration requirements nor COR roles and responsibilities.

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LIST OF ACRONYMS AND ABBREVIATIONS

AFARS	Army Federal Acquisition Regulation Supplement
ALU	Army Logistics University
ASA ALT	Assistant Secretary of the Army for Acquisition Logistics & Technology
ATP	Army Techniques Publication
CAR	Contract Action Report
CCAS	Contingency Contract Administration Services
CDR	Contract Deficiency Report
CDRL	Contract Data Requirement List
CENTCOM	Central Command
COA	Course of Action
CONUS	Continental United States
COR	Contracting Officer's Representative
CORT	Contracting Officer's Representative Tracking Tool
CPARS	Contractor Performance Assessment Reporting System
CMRA	Contractor Manpower Reporting Application
CTIP	Combating Trafficking In Persons
DAU	Defense Acquisition University
DCAA	Defense Contract Audit Agency
DCMA	Defense Contract Management Agency
DFARS	Defense Federal Acquisition Regulation Supplement
DA	Department of the Army
DAWIA	Defense Acquisition Workforce Improvement Act
DOD	Department of Defense
DoDD	DOD Directive
DoDI	DOD Instruction
DPAP	Defense Procurement Acquisition Policy
EDA	Electronic Document Access
FAR	Federal Acquisition Regulation
GAO	Government Accountability Office

GSA	Government Services Administration
LOA	Letter of Authorization
NATO	North Atlantic Treaty Organization
NDAA	National Defense Authorization Act
OCONUS	Outside Continental United States
OCS	Operational Contract Support
OPSEC	Operations Security
OUSD(AT&L)	Office of the Under Secretary of Defense (Acquisition, Technology, and Logistics)
PCO	Procuring Contracting Officer
PGI	DFARS Procedures, Guidance, and Information
POC	Point of Contact
PWS	Performance Work Statement
QAR	Quality Assurance Representative
QASP	Quality Assurance Surveillance Plan
SOFA	Status of Forces Agreement
SOW	Statement of Work
SPOT	Synchronized Pre-deployment and Operational Tracker
TBC	Theater Business Clearance
U.S.	United States
USC	United States Code
WAWF	Wide Area Work Flow

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I. INTRODUCTION

Inadequate surveillance of contracts has left [the Department] vulnerable to the potential that we are paying full price for less than full value.

—Ashton B. Carter (Acquisition Reform, 2011)

During the last decade, the Department of Defense (DOD) has increasingly used and relied on contractors to support operations in both the Continental United States (CONUS) and Outside Continental United States (OCONUS) environments due to the shortages of personnel in certain civilian and military occupational specialties (Government Accountability Office [GAO], 2008). Not only has the number of contracts increased, but also the requirements on those contracts have become increasingly complex. The DOD allows contractors to perform tasks that service members used to perform, so the monitoring of operational contract performance has become more necessary and more difficult. This increased use of contracted support requires more government personnel to perform contract administration and oversight responsibilities. Until recently, the Defense Contract Management Agency (DCMA) had performed the majority of contract administration and surveillance for large-dollar complex CONUS service contracts as well as Contingency Contract Administration Services (CCAS) for OCONUS service contracts. In April 2014, DCMA relinquished CCAS support, leaving each of the military services to provide oversight and administration of their own OCONUS contracts (Department of Defense, Defense Contract Management Agency [DOD DCMA], 2014). The change in contract administration support for OCONUS service contracts left a large performance-monitoring gap for the military services (heretofore called “services”) to fill in a short time. The services received a six-month notice of the impending CCAS change when notified in October 2013. The services were not trained—and thus were unprepared—to handle the responsibility of performing CCAS tasks. Specific CCAS training was necessary in order to perform unique tasks associated with the CCAS mission (Adrian, 2014). “CCAS tasks involve non-commercial, complex, cost-type contracts,” which is different from typical contingency type contracts (Adrian, 2014, p. 3). In November 2014, the Army Contracting Command,

in conjunction with DCMA-Kuwait representatives, provided Army Contingency Contracting personnel with a two-week CCAS training session (Adrian, 2014).

Contract administration requires continuous monitoring of contractor performance, which includes analysis and verification of services rendered. As the “on the ground” administrators of the contract, Contracting Officer’s Representatives (CORs) (1) verify goods and services meet the contract requirements, (2) monitor and collaborate the technical aspects of contractor performance with key stakeholders, (3) provide contract oversight and physical surveillance; and (4) perform administrative duties such as monitoring and approving invoices for payment (Defense Acquisition University [DAU], 2016).

Contracting Officers designate CORs in writing based on the Defense Federal Acquisition Regulation Supplement (DFARS) guidelines to perform contract surveillance from an administrative and technical perspective (DAU, 2016). CORs play a vital role in surveying, communicating, and documenting overall status of the contract to the contractor and the Contracting Officer.

A. PROBLEM IDENTIFICATION

Current acquisition news bulletins and numerous Department of Defense Inspector General (DOD IG) and GAO reports identify continuing issues in Army Contract Administration processes. The problems exist in both CONUS and OCONUS contingency environments. In May 2012, DOD IG personnel performed an audit and prepared a report that identified that U.S. Army Corps of Engineers officials “did not provide adequate oversight [on] the construction of a detention facility [in Afghanistan, nor] did they comply with internal [control] policies regarding oversight of the contractor’s warranty” (Department of Defense Inspector General [DOD IG], 2012, p. 4). In December 2015, DOD IG personnel performed an audit and prepared a report on Hurricane Sandy CONUS service contracts that identified that U.S. Army Corps of Engineers CORs did not effectively oversee and monitor contractor performance (DOD IG, 2015a).

Furthermore, a March 2015 *Contingency Contracting Framework Update* report noted that DOD IG personnel had issued 40 reports from 2012 to 2014 that identified systemic contracting problems in OCONUS environments. Twenty-seven out of the 40, or 68% of these reports, identified inadequate contract oversight and surveillance as major problem areas because CORs did not develop adequate oversight strategies and Quality Assurance Surveillance Plans (QASPs) (DOD IG, 2015b, p. 6). The DOD IG report (2015b) pointed out that insufficient staffing and training/certification prevented COR personnel from effectively performing contract surveillance (p. 12). These contract administration deficiencies are a recurring theme in both CONUS and OCONUS environments. This research aims to find solutions to these problems and improve Army contract administration processes in both CONUS and OCONUS by answering the following primary and secondary research questions:

1. Primary Research Question

- Are COR processes and training different or the same in CONUS and OCONUS environments?

2. Secondary Research Questions

- What are the lessons learned/best practices in overseeing Army CONUS and OCONUS service contracts?
- What are the relative advantages and disadvantages of CORs performing administration on Army contracts in CONUS and OCONUS?

B. PURPOSE AND BENEFIT

This Joint Applied Project evaluates current Army contract administration procedures, as related to the COR function, to identify improvement areas and best practices. We use interviews to validate current contract administration practices and gain expert insight into the effectiveness of COR training. We develop recommendations to improve COR education, staffing, and leadership support, and summarize best practices to streamline the Army's COR contracting administration duties in both CONUS and OCONUS environments. The intended audience for this research is Army leadership, Defense Acquisition University (DAU) educators, Army contracting personnel, and

Army personnel performing contract administration functions. Although we focus on the Army for our analyses, the results are likely to be useful across the Department of Defense.

C. METHODOLOGY/SCOPE

1. Methodology

To perform this research, we conducted (1) literature reviews from secondary sources and (2) interviews from primary sources. Literature was analyzed from GAO reports, DOD and Army publications, DOD IG reports, theses from the Naval Postgraduate School (NPS), and other applicable documents. Data gathered from these secondary sources proved beneficial in identifying contract administration problems in both CONUS and OCONUS environments. We conducted interviews with military and civilian personnel with real-world contract administration experience to determine the root causes of the problems identified in the literature reviews. We asked Army experts for recommended solutions to the contract administration issues in order to comprehensively understand how to fix these problems. We compared literature findings, government reports, and interviews to identify common themes.

2. Project Organization

This project includes five chapters that are organized as follows. Chapter I introduces the purpose of the research and identifies the main problem we aim to solve. Chapter II presents the literature on COR roles and responsibilities; DOD and Army COR regulations, policies, and training; and published reports from the GAO, DOD IG, and NPS. Chapter III describes the methodology for data collection; including interview questions and processes; and the analysis performed. Chapter IV discusses the results as they relate to five key improvement issues for Army contract administration. Chapter V details conclusions, recommendations, and areas for further research.

II. LITERATURE REVIEW

Chapter I provided an introduction to this research by explaining the importance of contract administration and outlining an overall approach to meeting the research's objectives. This chapter focuses on current literature surrounding CONUS and OCONUS CORs. First, we explain what a COR is, how he or she is appointed, and describe the COR's roles and responsibilities. Next, we highlight DOD and Army COR regulations, policies, and training requirements for CONUS and OCONUS CORs. Finally, we provide a narrative review of what other researchers have written about this subject.

A. DESCRIPTION OF COR ROLES AND RESPONSIBILITIES

The DOD defines a COR as “an agent of the Government that acts as the eyes and ears of the Contracting Officer and as a liaison between the Government and the contractor when executing surveillance responsibilities” (Director, Defense Procurement Acquisition Policy, Office of the Under Secretary of Defense (Acquisition, Technology, and Logistics) (DPAP, OUSD[AT&L]), 2012a, p. 9). The Defense Federal Acquisition Regulation Supplement (DFARS) 252.201-7000 also defines a COR as “an individual designated in accordance with subsection 201.602-2 of the DFARS and authorized in writing by the Contracting Officer to perform specific technical and administrative functions” (Defense Federal Acquisition Regulation Supplement [DFARS], 2016, section 252.2-7). Ultimately, the customer organization nominates a COR based on the complexity of the requirement, and the technical experience and training of the individual.

The contracting process involves three phases: (1) pre-award and solicitation; (2) evaluation and contract award; and (3) post-award and contract administration (DPAP, OUSD[AT&L], 2012a, p. 52). CORs primarily carry out their responsibilities during the contract administration phase; however, CORs do perform some pre-award duties. General duties that a COR is involved in during pre-award include: conducting market research, preparing the statement of work or performance work statement, developing the quality assurance surveillance plan (QASP), preparing the independent government cost

estimate (IGCE), and developing a government furnished property list. Because the primary focus of this research is on Army contract administration, we focus the discussion on that phase of the contracting process. The final and typically longest phase, Contract Administration, is an extremely important phase for a COR to perform his or her duties, as this phase often determines contract success or failure. A COR serves as a key representative to the Contracting Officer as he or she performs contract administration duties. Contract administration duties can be quite extensive and involve several elements—post-award kick-off meetings; contract compliance measures; contract performance monitoring; contract modification actions; invoice and payment processes; and contract completion and closeout procedures (DPAP, OUSD[AT&L], 2012a)—all of which the COR is involved in to ensure that DOD receives what they paid for. The main focus of CORs performing contract administration duties is for the United States Government to obtain goods and services that are of the specified quality and within the agreed-to cost and schedule parameters (DPAP, OUSD[AT&L], 2012a).

CORs perform important surveillance functions in ensuring the DOD receives quality goods and services within cost, schedule, and performance parameters. CORs are critical participants in the contract administration process given the complexity of organizational requirements and on-going tasks required to ensure successful contract performance.

CORs should clearly understand their roles and limitations when performing contract administration duties. COR roles include serving as the technical representative who performs some pre-award tasks, such as developing the statement of work or performance work statement, along with post-award tasks, such as contract surveillance for the Contracting Officer. Since the COR is the eyes and ears of the Contracting Officer, he or she monitors the technical and administrative performance of the contract by reporting any issues to the Contracting Officer; as well as evaluating contractor performance and responding to contractor questions or issues.

COR responsibilities are listed in their official COR letter of appointment from the Contracting Officer. COR post-award contract administration duties vary from contract to contract; however, some common duties include:

- Understanding the contract and knowing COR limitations
- Maintaining regular communications with the contractor, contracting officer, and the COR's supervisor
- Participating in contract related meetings and filing meeting minutes in the contract file
- Establishing and maintaining accurate and complete contract files
- Preparing monthly contract status reports for Contracting Officer review
- Managing correspondence and responses
- Maintaining correspondence with the contractor
- Preparing correspondence to the Contracting Officer
- Inspecting and accepting or rejecting contract deliverables from a quality perspective based on the Quality Assurance Surveillance Plan (QASP)
- Reviewing and approving monthly contractor invoices for payment
- Managing and safeguarding proprietary and sensitive contract information
- Coordinating with contractor and contracting officer to resolve contract problems
- Managing unsatisfactory contract performance issues
- Tracking and understanding contract modification impacts
- Providing technical knowledge to oversee the contract
- Maintaining COR certification and completing necessary training
- Concluding COR appointment as necessary per guidelines. (DPAP, OUSD[AT&L], 2012a, p. 30–31).

Appendix A provides a more comprehensive list of COR responsibilities during the contract administration phase.

B. FEDERAL AND DOD COR REGULATIONS, POLICIES, AND TRAINING

The DOD maintains several regulatory guidelines and policies relating to CORs. We provide an overview of those documents as well as required COR training requirements for CONUS and OCONUS CORs.

1. Federal and DOD COR Regulations

At the federal level, the Federal Acquisition Regulation (FAR) codifies the laws pertaining to soliciting, awarding, and administering contracts on behalf of the federal government. It also provides guidance to members of the acquisition team (particularly Contracting Officers) to ensure uniform application of contracting procedures across all federal entities. FAR 1.602-2, paragraph (d) discusses the responsibilities of Contracting Officers.

Contracting Officers shall designate and authorize, in writing and in accordance with agency procedures, a contracting officer's representative (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 contracting officer retains and executes the COR duties. [The paragraph also mandates that] the COR shall be a government employee (unless other agency regulations permit non-governmental employees to conduct COR duties)¹; [the COR] shall be certified and maintain certification in accordance with [federal acquisition certification guidelines]; [the COR] shall be qualified by training and experience commensurate with the [COR] responsibilities; [the COR] may not be delegated responsibility to perform functions that have been delegated under FAR 42.202 to a contract administration office; [the COR] has no authority to make any commitments or changes that affect price, quality, quantity, delivery, or other terms and conditions of the contract nor in any way direct the contractor or its subcontractors to operate in conflict with the contract terms and conditions; [the COR] shall be nominated either by the requiring activity or in accordance with agency procedures; and [the COR] shall be designated in writing, with copies furnished to the contractor and the contract administration office [which outlines] the COR's authority to act on behalf of the contracting officer [during the

¹ The Defense supplement to the FAR, known as the DFARS, explicitly states that, for defense contracts, CORs shall be "an employee, military or civilian, of the U.S. Government, a foreign government, or a North Atlantic Treaty Organization/coalition partner. In no case shall contractor personnel serve as CORs" (DFARS 201.602-2).

specified] period covered by the designation. (Federal Acquisition Regulation [FAR], 2016, section 1.602-2(d)(1-7iii))

The FAR has a selective process in place to designate a COR.

At the DOD level, DFARS, subpart 201.602-2, current edition, is the DOD supplemental regulation to the FAR that is used to officially appoint CORs. For the DOD, when a Contracting Officer intends to appoint a COR to a contract, he or she must insert clause DFARS 252.201-7000, Contracting Officer's Representative (DEC 1991), into the solicitation and resulting contract. This clause:

defines a COR as an individual designated in accordance with [DFARS] subsection 201.602-2 and authorized in writing by the Contracting Officer to perform specific technical or administrative functions. [This clause also states that] if the Contracting Officer designates a COR, the contractor will receive a copy of the written designation; the designation will specify the extent of the COR's authority to act on behalf of the Contracting Officer; the COR is not authorized to make any commitments or changes that will affect price, quality, quantity, delivery, or any other term or condition of the contract. (DFARS, 2016, clause 252.201-7000)

In addition to the FAR and DFARS, DOD agencies are also subject to DOD Instruction 5000.72, dated 26 March 2015, which establishes uniform DOD policies for identifying, developing, certifying, and managing CORs. This document standardizes the way the service components and defense support agencies assign, train, certify, and manage their CORs. It is a key document for DOD agencies, Contracting Officers, Combatant Commanders, CORs, requiring activities, and supervisors of CORs. This DOD Instruction has several enclosures outlining contract administration responsibilities, procedures for designating a COR, COR nomination process, qualification requirements for CORs, and examples of COR responsibilities and COR certification requirements.

2. DOD COR Guides and Policies

The primary guides utilized by Army CORs are the *DOD COR Handbook* and the *Defense Contingency COR Handbook*. The *DOD COR Handbook*, dated 22 March 2012, is the overarching resource that addresses contract surveillance, roles and responsibilities of key stakeholders such as the Contracting Officer, the COR, and the COR's supervisor. This document serves as a supplement to COR surveillance from a training and

performance perspective. Equally important is the *Defense Contingency COR Handbook*, version 2, dated September 2012, which serves as a comprehensive guide for stakeholders involved in COR related functions in contingency environments. It covers topics such as the importance of contract surveillance, ethics and integrity, and monitoring service contracts in a contingency environment. This *Contingency* handbook also addresses OCONUS COR specific roles, responsibilities, and training.

Beyond these guides, the DOD also issues policy and guidance notices, which are produced whenever the existing COR policy changes. These notices provide detailed descriptions of the changes as well as implementation instructions.

DFARS Procedures, Guidance, and Information (PGI) 201.602-2(d)(i)(A), dated 30 October 2015, requires that:

Contracting Officers designate a COR for all service contracts, including both firm-fixed-price and other than firm-fixed-price contracts, awarded by a DOD component or by any other Federal agency on behalf of [the] DOD. The surveillance activities performed by CORs should be tailored to the dollar value/complexity of the specific contract for which they are designated. For geographically dispersed large contracts with multiple task orders, contracting officers should consider appointing multiple or alternate CORs to assist with surveillance duties. These CORs should have specific duties based on criteria, such as geographic region or distinct task areas, to avoid conflicting or duplicative direction. Contracting officers, [however], may exempt service contracts from this requirement when the following three conditions are met: (1) the contract will be awarded using simplified acquisition procedures; (2) the requirement is not complex; and (3) the Contracting Officer documents the file, in writing, with the specific reasons why the appointment of a COR is unnecessary. (DFARS, 2015, subsection 201.602-2(d)(i)(A))

DOD COR policy outlined in the DOD Instruction 5000.72, dated 26 March 2015 consists of the following main COR points:

(1) all CORs must be employees, military or civilian, of the U.S. Government, a foreign government, or North Atlantic Treaty Organization partner; (2) Contracting Officers will designate a COR for all service contracts unless the Contracting Officer retains and executes oversight duties of the contract; (3) a qualified COR is appointed for all contracts or orders placed for DOD requirements; (4) [contract] surveillance activities, performed by CORs, are [based on] the dollar value, complexity, and risk

of the procurement; (5) minimum COR competencies, experience, and training are based on the dollar value, complexity, [and risk of] the requirement;² and (6) Contracting Officers shall determine if COR duties meet the criteria for filing a Confidential Financial Disclosure Report [and if so], the Contracting Officer will instruct the COR to complete OGE Form 450. (Department of Defense [DOD], 2015, pp. 2–3)

In addition to guides and policy, Defense memorandums are produced as necessary to address specific topics and changes in requirements for CORs. To illustrate how they are used, we discuss two recent memorandums that have a COR focus. The Office of the Secretary of Defense Memorandum, “Update to the Department of Defense Contracting Officer’s Representative Tracking (CORT) Tool,” dated 10 February 2014, is a policy document that mandates all Military and DOD activities to utilize the CORT Tool when designating a COR. The DOD CORT Tool is a web-based system for appointing DOD CORs. Another important memorandum is the Deputy Secretary of Defense Memorandum, “Monitoring Contract Performance in Contracts for Services,” dated 22 August 2008. This policy document mandates the involvement of the requiring organization and COR supervisor in the COR nomination process and requires them to provide the COR with the necessary resources (e.g., funding, time, training, people, or equipment) to perform COR duties.

3. DOD COR Training

The “DOD Standard for COR Service Acquisitions is the standard which defines the minimum competencies, experience, and training type required for a qualified COR to be appointed,” including refresher training guidelines (DPAP, OUSD[AT&L], 2012a, p. 148). This Standard is based on the complexity and type of requirement being procured, as well as the overall contract performance risk. The DOD COR Training standard is geared toward establishing structure and uniformity to COR responsibilities, training certifications, and performance expectations. The three types are:

Type A is for fixed priced contracts that have no incentives and have a low performance risk level. The required COR training is (1) COR with a

² There are three types of COR appointments: Type A, Type B, and Type C. We discuss the competencies, experience, and training for each type of appointment later in this chapter.

Mission Focus (DAU CLC 106) unless Contracting Officer's Representative (DAU CLC 222) training has been completed; (2) Ethics for AT&L Workforce (DAU CLM-003) or agency equivalent; (3) Combatting Trafficking in Persons (CTIP) Awareness; (4) Invoicing, Receipt, Acceptance, and Property Transfer (IRAPT) formally known as Wide Area Work Flow (WAWF); and (5) DOD CORT Tool Overview. Additional training is required if the COR is, or is going to be, deployed: CORs in the Contingency Environment (DAU CLC 206) and Synchronized Pre-deployment and Operational Tracker (SPOT) system training. (DOD, 2015, p. 27)

Type B is for all other than fixed priced contracts that have a performance risk level other than low. The required COR training is (1) Contracting Officer's Representative (DAU CLC 222) on-line training, or an equivalent 36+ hour in-person COR course, or the Army Logistics University (ALU) 40 hour COR course; (2) Ethics for AT&L Workforce (DAU CLM-003) or agency equivalent; (3) Combatting Trafficking in Persons (CTIP) Awareness; (4) Invoicing, Receipt, Acceptance, and Property Transfer (IRAPT) formally known as Wide Area Work Flow (WAWF); and (5) DOD CORT Tool Overview. Additional training is required if the COR is, or is going to be, deployed: CORs in the Contingency Environment (DAU CLC 206) and SPOT system training. (DOD, 2015, p. 28)

Type C is for unique requirements that require a professional license, higher education, or some form of specialized training. The required COR training is (1) Contracting Officer's Representative (DAU CLC 222) on-line training, or an equivalent 36+ hour in-person COR course, or the Army Logistics University (ALU) 40 hour COR course; (2) Ethics for AT&L Workforce (DAU CLM-003) or agency equivalent; (3) Combatting Trafficking in Persons (CTIP) Awareness; (4) Invoicing, Receipt, Acceptance, and Property Transfer (IRAPT) formally known as Wide Area Work Flow (WAWF); and (5) DOD CORT Tool Overview. Additional training is required if the COR is, or is going to be, deployed: CORs in the Contingency Environment (DAU CLC 206) and SPOT system training. (DOD, 2015, p. 29)

Appendix B briefly describes these DOD COR training courses.

4. DOD COR Experience

Agency experience is another element of the DOD Standard for CORs. For Type A CORs, the standard experience required is six months. Type B and C CORs shall have at least 12 months of agency-specific experience (DOD, 2015). The Contracting Officer

does have the authority to waive such required experience, if requested and justified by COR management.

5. DOD COR Competencies

Possessing certain competencies and performance attributes are required elements of the DOD Standard for CORs. Such competencies are acquired through experience, formal education, and/or training. Those competencies vary based on the type of COR appointment. Competencies for Type A appointments include: attention to detail; making decisions while remaining flexible; communicating orally and in writing; solving problems through reasoning; teamwork; self-management initiative; business ethics; and effective COR and contract performance.

Competencies for Type B and C appointments include: analytical, project management, and strategic skills; knowledge of the contract type and overall marketplace; planning and evaluation skills; and effective interpersonal skills such as being influential and persuasive (DOD, 2015). It is important to remember that the DOD Standard is based on the complexity and type of requirement being procured along with the overall contract performance risk; therefore each type of COR appointment is unique and is not based on progression from a Type A to a Type C.

Detailed descriptions of COR required competencies, experience, and training are outlined in Tables 1, 2, and 3.

Table 1. DOD Standard for Certification of CORs—Type A.
Source: DOD (2015, p. 27).

NATURE OF TYPE A: WORK OR REQUIREMENT	REQUIRED COMPETENCY TOPICS	REQUIRED COMPETENCIES	EXPERIENCE AND TRAINING REQUIREMENTS
Fixed-price contracts without incentives and low performance risk. Attributes of such requirements might include: • Lack of technical or administrative complexity • No identifiable risk factors • Limited requirement for technical expertise • Low likelihood of modification • Effort is a follow-on to an existing contract COR responsibilities are generally limited to minimal technical and administrative contract surveillance.	<u>General:</u> • Attention to detail • Decision making • Flexibility • Oral and written communication • Problem solving and reasoning • Self-management and initiative • Teamwork <u>Technical:</u> • Business ethics • Effective communication of contract requirements • Effective contract performance management • Effective COR performance	On completion of mandatory training, the COR should be able to perform at least these competencies in a manner consistent with the nature of Type A work or requirements: • Assist in acquisition planning. • Assist in contract award process. • Establish and maintain a COR file with all required documentation. • Identify and prevent unethical conduct and instances of fraud, waste and abuse. • Perform technical and administrative contract surveillance and reporting responsibilities in accordance with the letter of designation and surveillance plan. • Recommend contract changes when necessary and monitor contract performance as modified. • Monitor contract expenditures and payments. • Monitor contract schedule compliance. • Perform liaison responsibilities between the contracting officer, the requiring activity, and the contractor for management of the contract. • Inspect and accept or reject deliverables during contract performance and at close-out in conformance with contract terms and conditions. • Monitor the control and disposition of U.S. Government furnished assets. • Perform surveillance in a contingency environment, when applicable.	<u>Experience:</u> • Agency experience: Minimum of 6 months unless waived. The waiver must be addressed in the nomination package. • Relevant technical experience: As determined by the requiring activity and COR Management for the contracting officer's consideration. • General competencies: As determined by the nominating supervisor for the contracting officer's consideration. <u>Training:</u> • DAU course, "Contracting Officer's Representative with a Mission Focus" (online). • DAU course, "COR in a Contingency Environment," when applicable (classroom or online). • WAWF training (online). • DoD Component provided ethics (designated OGE Form 450 filers only) & CTIP training. • Additional training mandated by the contracting activity or agency (e.g., security, etc.). <u>Refresher Training:</u> • Minimum of 8 hours COR specific training: ◦ Every 3 years, OR ◦ Before assuming COR responsibilities, if the individual has not served as a COR within the previous 24 months. • Annual DoD Component provided ethics (designated OGE Form 450 filers only) & CTIP training. • Any additional training mandated by the contracting activity or agency.

Table 2. DOD Standard for Certification of CORs—Type B.
Source: DOD (2015, p. 28).

NATURE OF TYPE B: WORK OR REQUIREMENT	REQUIRED COMPETENCY TOPICS	REQUIRED COMPETENCIES	EXPERIENCE AND TRAINING REQUIREMENTS
Fixed-price contracts with incentives; fixed-price contracts with other than low performance risk; and other than fixed-price contracts. This includes everything other than Types A and C. Attributes of such requirements might include: - Contract complexity or performance risk - Effort will be performed in multiple regions or remote geographic locations - The need for increased surveillance - Magnitude of the requirement - The contract contains incentive arrangements or cost sharing provisions - The contract is cost-type of T&M or LH type, or FP LOE COR responsibilities are of increased complexity.	<u>General:</u> - Attention to detail - Decision making - Flexibility - Influencing and persuasive interpersonal skills - Oral and written communication - Planning and evaluating - Problem solving - Reasoning - Self-management and initiative - Teamwork <u>Technical:</u> - Business ethics - Defining government requirements - Understanding and knowledge of contract type - Effective analytic skills - Effective communication of contract requirements - Effective contract performance management - Effective COR performance - Project management - Strategic planning - Understanding the marketplace	On completion of mandatory training, the COR should be able to perform at least these competencies in a manner consistent with the nature of Type B work or requirements: - Assist in acquisition planning. - Assist in contract award process. - Establish and maintain COR file with all required documentation. - Identify and prevent unethical conduct and instances of fraud, waste and abuse. - Review technical deliverables and ensure compliance with Statement of Work or Statement of Objectives (e.g., perform technical monitoring and reporting in accordance with a quality assurance surveillance plan or other quality surveillance plan). - Perform administrative monitoring and reporting responsibilities (e.g., handle security issues, attend meetings, etc.). - Recommend contract changes when necessary and monitor contract performance as modified. - Monitor contract expenditures and payments. - Monitor contract schedule compliance. - Perform liaison responsibilities between the contracting officer and the contractor for management of the contract. - Inspect, and accept or reject deliverables during contract performance and at close-out in conformance with contract terms and conditions. - Review and validate that contractor payment requests are commensurate with performance. - Monitor control and disposition of U.S. Government furnished assets. - Perform surveillance in a contingency environment, when applicable.	<u>Experience:</u> - Agency experience: Minimum of 12 months unless waived. The waiver must be addressed in the nomination package. - Relevant technical experience: As determined by the requiring activity or COR management for the contracting officer's consideration. - General competencies: As determined by the nominating supervisor for the contracting officer's consideration. <u>Training:</u> - DAU course, "Contracting Officer's Representative" (classroom or on-line) or ALU-CL or equivalent course. - DAU course, "COR in a Contingency Environment," when applicable (classroom or online). - WAWF training (online). - DoD Component provided ethics (designated OGE Form 450 filers only) & CTIP training. - Additional training mandated by the contracting activity or agency (e.g., security, etc.). <u>Refresher Training:</u> - Minimum of 16 hours COR specific training: - Every 3 years, OR - Before assuming COR responsibilities, if the individual has not served as a COR within the previous 24 months. - Annual DoD Component provided ethics (designated OGE Form 450 filers only) & CTIP training. - Any additional training mandated by the contracting activity or agency.

Table 3. DOD Standard for Certification of CORs—Type C.
Source: DOD (2015, p. 29).

NATURE OF TYPE C: WORK OR REQUIREMENT	REQUIRED COMPETENCY TOPICS	REQUIRED COMPETENCIES	EXPERIENCE AND TRAINING REQUIREMENTS
Unique contract requirements that necessitate the COR have a higher education or specialized training beyond the Type B requirements. Attributes of such requirements might include: • Environmental remediation • Major weapons systems • Medical or dental or veterinarian services, etc. COR responsibilities are of increased complexity.	<u>General:</u> • Attention to detail • Decision making • Flexibility • Influencing and persuasive interpersonal skills • Oral and written communication • Planning and evaluating • Problem solving • Reasoning • Self-management and initiative • Teamwork <u>Technical:</u> • Business ethics • Defining government requirements • Understanding and knowledge of contract type • Effective analytic skills • Effective communication of contract requirements • Effective contract performance management • Effective COR performance • Project management • Strategic planning • Understanding the marketplace	On completion of mandatory training, COR should be able to perform at least these competencies in a manner consistent with the nature of Type C work or requirements: • Assist in acquisition planning. • Assist in contract award process. • Establish and maintain COR file with all required documentation. • Identify and prevent unethical conduct and instances of fraud, waste and abuse. • Review technical deliverables and ensure compliance with Statement of Work or Statement of Objectives (e.g., perform technical monitoring and reporting in accordance with a quality assurance surveillance plan or other quality surveillance plan). • Perform administrative monitoring and reporting responsibilities (e.g., handle security issues, attend meetings, etc.). • Recommend contract changes when necessary and monitor contract performance as modified. • Monitor contract expenditures. • Monitor contract schedule compliance. • Perform liaison responsibilities between the contracting officer and the contractor for management of the contract. • Inspect, accept or reject deliverables during contract performance and at close-out in conformance with contract terms and conditions. • Review and validate that contractor payment requests are commensurate with performance. • Monitor and control disposition of government furnished assets. • Perform surveillance in a contingency environment, when applicable. • Other specific functions consistent with the objectives of the activity's mandatory specialized or technical training.	<u>Experience:</u> • Agency experience: Minimum of 12 months unless waived. The waiver must be addressed in nomination package. • Relevant technical experience: As determined by the requiring activity or COR management for the contracting officer's consideration. • General competencies: As determined by the nominating supervisor for the contracting officer's consideration. <u>Training:</u> • DAU course, "Contracting Officer's Representative" (classroom or on-line) or ALU-CL or equivalent course. • DAU course "COR in a Contingency Environment," when applicable (classroom or online). • WAWF training (online). • DoD Component provided ethics (designated OGE Form 450 filers only) & CTIP training. • Additional training mandated by the contracting activity or agency (e.g., security, etc.). <u>Refresher Training:</u> • Minimum of 16 hours COR specific training: ◦ Every 3 years, OR ◦ Before assuming COR responsibilities, if the individual has not served as a COR within the previous 24 months. • Annual DoD Component provided ethics (designated OGE Form 450 filers only) & CTIP training. • Any additional training mandated by the contracting activity or agency. • Any necessary for maintenance of license or certification, etc.

C. ARMY COR REGULATIONS, POLICIES, AND TRAINING

This section outlines the Department of the Army's regulatory guidelines and policies relating to CORs. The Department of the Army utilizes the DOD's COR training standards as outlined in the preceding section. Additional Army-specific COR training requirements for CONUS or OCONUS CORs are provided in this section.

1. Army COR Regulation

“The Army Federal Acquisition Regulation Supplement (AFARS) implements and supplements the Federal Acquisition Regulation (FAR), the Defense FAR Supplement (DFARS) and the DFARS Procedures, Guidance, and Information (PGI) to establish uniform policies for Army acquisitions” (Army Federal Acquisition Regulation System [AFARS], 2016, subpart 5101.101). AFARS, part 5101.602-2-91, current edition, is the Army supplemental regulation that provides direct information about COR appointments at the Army level. Paragraph (a) permits Contracting Officers to “designate a properly trained COR prior to contract award consistent with DFARS 201.602-2.” Paragraph (b) strictly directs the Contracting Officers to “allow 45 calendar days after receipt of the procurement package for the requiring activity to satisfy all COR requirements and if, after 45 days, a COR has not been properly trained and nominated, the Contracting Officer will cease further action and return the procurement package to the requiring activity.” Paragraph (c) directs Contracting Officers to “validate COR and ordering records every 12 months in accordance with DFARS PGI, as well as document the review in the contract file” (AFARS, 2016, subpart 5101.602-2-91).

2. Army COR Policies and Guides

The Army has developed specific guidance and policy guides that support federal and DOD policy of CONUS and OCONUS COR functions to better explain the broad policy down to the Army level. Because the DOD policy, guidance, and instructions are broad, and thus open for interpretation, the Army generated supporting guidance and documentation so that Army CORs can better understand what is expected of them at the Army level. For example, in the *Army Contracting Command (ACC) COR Handbook*, which fully supports the *DOD COR Handbook*, Army templates are provided concerning COR Monthly reports, COR Appointment Letters, COR Termination Letters, and Annual COR File Review Checklist. Next, we identify and discuss Army COR financial contingency guidance, policy guides, and handbooks.

The Department of the Army Financial Management Guidance for Contingency Operations, dated 12 November 2015, addresses an important program called the

Commander's Emergency Response Program (CERP). "The Army is the executive agent for appropriated CERP funding executed by U.S. Forces Afghanistan" (Department of the Army [DA], 2015, p. 14). CERP provides critical funding capability for ground commanders while conducting stability, economic development, and urgent humanitarian assistance operations in support of contingency operations. In contingency environments, CORs can expect to administer and survey projects relating to "(1) water and sanitation; (2) food production and distribution; (3) agriculture and irrigation; (4) electricity production/distribution [such as purchasing generators]; (5) telecommunications; (6) repair of civic/cultural facilities; (7) education [to reconstruct schools and purchase school supplies]; (8) health care; (9) transportation [such as purchasing or leasing vehicles to support efforts]; and (10) repair battle damage for losses incurred as a result of U.S., coalition or supporting military operations" (DA, 2015, p. 21).

The ACC has developed two Contracting Officer's Representative Policy Guides that Army CORs use frequently. The Interim ACC Contracting Officer's Representative Policy Guide, ACC Pamphlet 70-1, dated 26 March 2010, provides guidance to CORs and describes the training and management strategy for CORs to ensure ethical behavior and continuity of standards across the ACC. This document is applicable to Contracting Officers, CORs, COR Supervisors, and Army Analysts tracking COR training.

The Army Contracting Command-Aberdeen Proving Ground (ACC-APG) Contracting Officer's Representative Handbook, dated August 2011 provides Army CORs with information on training and qualifications, an automated nomination process, duties for specific commodity areas, responsibilities, contract documentation, reporting requirements, and Quality Assurance Surveillance Plan development. This Army COR Handbook is consistent with the DOD COR Handbook. It serves as an additional guide for CORs appointed by the ACC-APG to better assist CORs in performing contract oversight functions from a broad perspective, as well as a local perspective. This handbook is applicable to Contracting Officers, CORs, COR Supervisors, and Army Policy Analysts.

3. Army COR Training

Army COR Training utilizes the DOD COR training standards as cited in the “DOD COR Training” section for Type A, Type B, and Type C CORs. Additionally, Contracting Officers may determine that an Army COR requires additional contract specific training such as: Operations Security (OPSEC); Contractor Performance Assessment Reporting System (CPARS); Contractor Manpower Reporting Application (CMRA); Electronic Document Access (EDA), Local Vendor Base; Survival Evasion Resistance and Escape (SERE); Country specific pre-deployment; Language/dialect; Status of Forces Agreement (SOFA); and Theater Business Clearance (TBC). Additional training is specific to the requirements of the contract or functions assigned to the COR by the contracting officer. Appendix C provides a more detailed description of these courses/applications.

D. PUBLISHED COR-RELATED REPORTS (GAO/IG/NPS)

The authors analyzed Government Accountability Office (GAO) reports, DOD and Army publications, Department of Defense Inspector General (DOD IG) reports, theses from the Naval Postgraduate School, and other documents in order to determine commonalities and trends associated with Army contract administration in regard to CORs. The authors identified four common trends: (1) insufficient number of CORs, (2) systemic lack of training, (3) inadequate technical experience, and (4) inadequate QASPs to measure contractor performance.

1. Insufficient Number of CORs

On multiple occasions, the GAO and the DOD IG identified the problem of an insufficient number of CORs monitoring and administering both CONUS and OCONUS contracts. The thousands of contracts in Afghanistan and Iraq had too few CORs for proper oversight (GAO, 2012).

Additionally, the DOD IG (2015b) identified that the “Army Field Support Battalion—Kuwait did not provide appropriate [personnel to perform] contract oversight to validate” the necessity of repair orders and to verify the accuracy of labor hours billed

on many construction contracts (p. 12). Because an insufficient number of CORs performed oversight, many CORs became overloaded with construction contracts to oversee in theater, making it impossible for a COR to be present at each construction site when major milestones took place. As a result, problems were not identified until buildings were already completed. This resulted in significant safety risks and considerable rework for the DOD, the cost of which ultimately fell on the U.S. taxpayer (GAO, 2011).

Another example involved an insufficient number of CORs providing oversight of dining facilities in Afghanistan (GAO, 2012). Army guidance requires CORs to “check food for sanitation and safety at all dining facilities at every meal period” (GAO, 2012, p. 25). With a limited number of CORs available to verify food preparation procedures, the health and safety of military and civilian personnel were put at risk, which could ultimately impact combat effectiveness.

In a CONUS contingency example, the GAO (2008) found that “in the aftermath of Hurricanes Katrina and Rita, the number of government personnel monitoring contracts was not always sufficient or effectively deployed to provide adequate oversight” (p. 9). This resulted in a state of flux, and oversight personnel had difficulty confirming what goods and services were supplied during a major crisis within the CONUS.

The general theme from these secondary sources is that the DOD acquisition workforce’s workload and the complexity of contract requirements to be surveyed continues to grow; however, the DOD has not provided an adequate number of oversight personnel on CONUS and OCONUS contracts, which increases the risk to DOD missions and personnel and reduces the DOD’s ability to be sure it received what it paid for. Moreover, since 2011, the DOD has been drawing down U.S. forces in contingency environments. Current legislation limiting the number of boots on the ground in OCONUS environments exacerbates the problem, as even fewer CORs are available to perform contract oversight.

2. Systemic Lack of Training

On multiple occasions, GAO and DOD IG officials identified a systemic lack of training for CONUS and OCONUS CORs. GAO investigators identified that CORs are not prepared to perform their duties overseeing contracts because the mandatory COR training does not teach CORs how to generate statements of work and how to function in a contingency environment (GAO, 2011). Additionally, GAO and Army investigators found that the insufficient number and lack of training among CORs responsible for overseeing contractors performing prisoner interrogation services at Abu Ghraib prison in Iraq left the Army unable to properly measure contractor performance and attend to contractor personnel conduct issues at the prison (GAO, 2008).

In Afghanistan, the DOD IG identified that the Defense Contract Management Agency (DCMA) and the International Security Assistance Force Joint Command (ISAFJC) personnel did not always provide contract-specific Field Mentorship training to CORs that were responsible for oversight of the Afghan National Police contract, which left the DOD vulnerable in safety and security measures. As a result, DCMA and ISAFJC leaders could not verify that the Army received the fielded mentoring services purchased by contract (DOD IG, 2015b).

The GAO (2012) also identified gaps in the COR training curriculum. For instance, the training focused on low-risk contracts and did not fully address real-world high-risk contract arrangements, leaving CORs unable to understand the full scope of their responsibilities and unable to fully ensure that contract requirements were met in both CONUS and OCONUS environments. As a result of CORs not understanding the full scope of their responsibilities, “items such as portable toilets, security gates, water, and other items or services were not available when needed, and [raised] concerns about security, military readiness, hygiene, and morale” (p. 11).

The DOD is still working on providing resolutions to all of the findings; however, they did develop a new contingency-focused COR training course to improve COR skills in providing contract administration and oversight support. Additionally, “DOD took steps to institutionalize operational contract support by including some COR related

training in professional military education programs and by emphasizing the need for qualified CORs by discussing their responsibilities in joint doctrine” (GAO, 2012, p. 10). Although the DOD has taken steps in the past few years to improve existing COR training, inadequacies remain in the program. A large number of CORs are still not fully prepared to perform their contract administration duties. Having inadequately trained CORs performing contract oversight can lead to fraud and waste in both CONUS and OCONUS environments.

3. Inadequate Technical Experience

On multiple occasions, the GAO identified that CORs have inadequate technical experience to perform their contract oversight duties in both CONUS and OCONUS environments. The GAO (2012) identified that “CORs do not always have the necessary technical knowledge or reach back capabilities to subject matter experts possessing those technical skills to effectively oversee technical and complex contracts in Afghanistan” (p. 18). Specifically, CORs appointed to provide oversight to construction contracts often lacked any engineering or construction experience. That lack of technical experience required the “newly constructed buildings to be repaired or rebuilt before service members could use the facilities” since the CORs could not ensure the safety of the buildings (GAO, 2012, p.18). In this case, inadequate technical experience wasted time and money, caused low service member morale, and increased risk to the safety of personnel who used these buildings.

The increasing complexity of Army contracts requires well trained and technically skilled personnel in order to perform effective contract surveillance and oversight. The GAO report (2012) identified an occurrence where

a COR prepared a statement of work for a contract to build floors and install tents but failed to include any power requirements which is necessary to run air conditioners, heaters, and lights because the COR did not possess any electrical technical expertise to properly and safely specify the correct power converter package. (p. 19)

As a result of the COR’s lack of technical experience, the contractor set up tents that were unusable until the contractor installed the correct power converters at an additional

cost to the taxpayer. The GAO stated that the issue of CORs not possessing the necessary technical expertise has been a longstanding problem and remains a problem within DOD CONUS and OCONUS environments.

4. Inadequate QASPs to Measure Contractor Performance

On multiple occasions, DOD IG officials identified inadequate QASPs to measure contractor performance in both CONUS and OCONUS environments. A fully developed and appropriate QASP is vital to ensuring contractors perform according to the contract's schedule, meet the contract's requirements, and employ adequately skilled personnel to perform required tasks.

DOD IG investigators identified that PEO Aviation personnel responsible for the Mi-17 aircraft overhaul did not develop a QASP, nor designate a COR to perform contract surveillance and oversight (DOD IG, 2013).

Another DOD IG investigation revealed that CORs from the U.S. Army Corps of Engineers New York District office, who were responsible for monitoring contractor performance for a Hurricane Sandy contract, made minimal visits to the site of contract performance. Instead, the COR relied on program representatives to monitor quality assurance controls and overall contract progress (DOD IG, 2015a). In this case, the COR did not verify contractor performance against the QASP. In both DOD IG cases, the CORs did not use QASPs to measure contractor performance.

In another report, DOD IG investigators identified that PEO STRI officials did not prepare an adequate QASP to be used in measuring contractor performance for the Joint Multinational Readiness Center contract. The COR developed the QASP for the PEO STRI effort using a generic template but did not include specific metrics for monitoring the performance of major portions of the performance work statement (PWS), such as assessing how well the contractor maintained the exportable instrumentation system (DOD IG, 2014). As a result of having an inadequate QASP, PEO STRI did not fully use the instrumentation system as intended and outlined in the PWS and PEO STRI ended up paying for an underused system (DOD IG, 2014). The DOD IG recommended that PEO STRI update and revise the QASP in accordance with FAR 46.4 guidelines. The

Deputy Assistant Secretary of the Army for Procurement commented that “the revised QASP will include specific methods of surveillance; frequency of surveillance; a checklist providing detailed surveillance information specific to each effort for the CORs and Quality Assurance Representatives; and a matrix tying performance measures back to the PWS” (DOD IG, 2014, p. 16).

In another report, DOD IG (2015b) investigators discovered that:

CORs for the Afghan National Police contract did not conduct effective contractor surveillance. The CORs failed to complete the required audit checklists based on assigned risk levels. Audit checklists had not always been completed and even when they were, certain items had not been completed. In addition, CORs had inconsistent information when communicating oversight results. Investigators reviewed 166 audit checklists and found that 147 audit checklists generated by CORs did not properly document contractor noncompliance. As a result of CORs not adequately performing surveillance against a QASP, DCMA personnel could not verify that the Army fully received approximately \$20.9 million per month of services paid under the Afghan National Police contract. (p. 9)

Investigators recommended ACC-Rock Island Contracting coordinate with key stakeholders by updating the audit checklists and the QASP as necessary every time there is a modification to the contract SOW in order to be able to adequately verify services were rendered on the Afghan National Police contract (DOD IG, 2015b).

A final DOD IG audit identified that the Army’s Ebola Fight contract failed to have an acceptable QASP in place to ensure proper oversight, and that Contracting Officers appointed untrained CORs to the contract. As a result, CORs were not able to ensure how the contractor spent \$33.8 million intended for basic life support services, which was partially due to the lack of COR training and not using an adequate QASP to properly measure contractor performance (Sege, 2015). Although the Army was functioning at a high tempo to combat the Ebola epidemic, fully trained and knowledgeable CORs should have developed adequate QASPs in order to measure contractor performance.

Based upon review and analysis of published COR-related literature, we found four key trends that must be addressed, as they affect the Army’s ability to efficiently and

effectively perform contract administration. The four key areas are (1) insufficient number of CORs, (2) systemic lack of training, (3) inadequate technical experience, and (4) inadequate QASPs to measure contractor performance. These four improvement areas are vital to proper contract oversight and surveillance to ensure the Army receives full value for the price paid. The interviews we conducted (see Chapter IV) validate these trends.

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III. METHODOLOGY

The primary objective of this research project is to examine and analyze Army contract administration procedures in CONUS and OCONUS performed by CORs for service contracts. By analyzing COR roles, responsibilities, training, surveillance trends and interview results, we provide Army Contracting leadership with recommendations to improve Army COR contract administration in CONUS and OCONUS by leveraging lessons learned and best practices.

Data gathered from the literature review proved beneficial to developing interview questions that further examine COR-related contract administration procedures. In order to examine how COR roles, responsibilities, training, and surveillance differed between CONUS and OCONUS, we used structured interviews to uncover the nuances of each role in different locations.

A. INTERVIEW QUESTIONS AND THE INTERVIEW PROCESS

We used three types of interview questions based on the role of the individual being interviewed (COR, Leader/Supervisor, Commander). A total of eight structured interviews took place from 4 May to 3 June 2016. Interviews were performed at the authors' offices, primarily face-to-face (one telephone interview occurred).

Each interview aimed to identify problems within the Army's contract administration process by identifying gaps in current CONUS and OCONUS COR activities. A full version of the interview questions can be found in Appendices D through F; however, three sample questions provided later in this section demonstrate how the questions relate to the objective of the research. Information obtained during the interviews has been secured and no personally identifiable information was collected, as all the information provided during the interviews was analyzed and aggregated into common areas of focus.

Sample interview questions used during the interviews are provided next. The interviews validated systemic problems within the Army's contract administration procedures as they relate to CORs in both CONUS and OCONUS environments and

helped determine how contract administration could be improved so that CORs can provide more efficient and effective contract administration support.

1. COR Sample Question

Did you receive adequate COR training to perform COR duties either in a CONUS or OCONUS environment? This question determines whether the required COR training successfully prepared CORs to perform the variety of contract administration duties expected of them.

2. Leaders/Supervisors of CORs Sample Question

Do you review and approve Quality Assurance Surveillance Plans (QASPs) within your organization? If so, what key aspects of the QASP do you look for to ensure sound surveillance practices are conducted? This question determines whether leaders and supervisors of CORs are knowledgeable about QASPs and surveillance requirements, and gives insight into whether QASPs are being developed and used correctly to monitor contractor performance in accordance with the contract.

3. Commanders of CORs Sample Question

Are you familiar with the roles and responsibilities of CORs in a CONUS or OCONUS environment? This question seeks to understand whether or not commanders of CORs have the fundamental knowledge and understanding of the magnitude of duties expected of CORs that they are overseeing in order to determine whether realistic expectations are being set.

B. SAMPLE

Interview candidates had real world experience either as an Army COR or managing Army CORs overseeing contracts. Additionally, the OCONUS CORs and the commanders, leaders, and supervisors of CORs had recent and relevant experience of the OCONUS contract administration processes, as they had recently been deployed to Kuwait, Afghanistan, and/or Iraq. We interviewed two Commanders overseeing CORs, two Leaders/Supervisors overseeing CORs, two CONUS CORs and two OCONUS

CORs. Of the eight Army participants, two were military contracting professionals (25%) and six were civilian personnel (75%).

The interview participants had a moderate amount of contracting and COR experience throughout their careers. CONUS CORs oversaw an average of eight active contracts and had a little over four years of contracting experience. OCONUS CORs oversaw an average of ten active contracts with three years of contracting experience and an average of nine months of deployment experience. Leaders/Supervisors of CORs managed an average of thirteen active contracts and had approximately four years of contracting experience. Commanders of CORs managed an average of 51 active contracts and had an average of six years contracting experience and an average of 12 months of deployment experience.

C. ANALYSIS

To consolidate the results of the interviews, we highlighted words, phrases, and sentences of relevant information from each interview while capturing candid COR experiences. Information was deemed relevant when interviewees repeated information, or the interviewee explicitly stated that it was important, or similar contract administration issues appeared in previously published reports (e.g., DOD IG or GAO reports). After consolidation of relevant information, we identified commonalities between the literature findings, government reports, and the interviews.

Identification of gaps in the contract administration processes occurred across the command, leadership/supervisor, and COR levels. Detailed results from the interviews and an understanding of how contract administration issues affect operations in both CONUS and OCONUS environments are presented in Chapter IV.

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IV. RESULTS

This chapter provides results from the interviews and previously published reports grouped based on the following five common COR issues that need to be addressed: education/training, communication, staff levels, oversight, and leadership support. The effects these issues have on contract administration operations in both CONUS and OCONUS environments will be discussed.

A. EDUCATION /TRAINING

The interview results suggested a need for further COR education/training on the following topics: (1) OCONUS operations; (2) Quality Assurance Surveillance Plan (QASP) development and use; and (3) understanding contract financing.

1. OCONUS Operations

The primary difference in education and training among CONUS CORs and OCONUS CORs is that OCONUS CORs require additional training. CONUS and OCONUS CORs must take the DOD Standard training as outlined in Chapter II; however, OCONUS CORs have to also take additional theater-specific training, such as DAU CLC 206 Contingency COR course, Synchronized Pre-deployment and Operational Tracker (SPOT) system training, and learning how to generate Letters of Authorization (LOAs) and Theater Business Clearances (TBCs).

Even though the DOD enhanced some of the COR course material, the current DOD Standard for COR training remains inadequate. The GAO (2012) “found that CORs are not prepared to oversee contracts because the required training does not include specifics on how to complete written statements of work and how to operate in Afghanistan’s unique contracting environment” (p. 2). The GAO (2011) provided a specific example of how the DAU COR Contingency course is lacking, saying that “the required training does not provide CORs with information regarding important issue areas like the Afghan First Program, which encourages an increased use of local personnel and vendors for goods and services as part of the U.S. counterinsurgency

strategy” (p. 5). The interviews validate that the COR training remains inadequate, with six out of the eight respondents citing this problem. When asked whether he had received adequate COR training to perform COR duties, one CONUS COR indicated that the DAU on-line COR training is inadequate and insufficient to prepare CORs for realistic execution of COR duties. Another COR responded that “the 40-hour COR course just teaches you the basics of surveillance concerning a *best case* scenario firm-fixed price contract and was not realistic considering I oversee cost-plus fixed fee contracts.”

Additional COR training deficiencies noted during the interviews include: (1) OCONUS CORs require training in adjudicating contractor personnel in-country privileges and security measures within the SPOT system; (2) OCONUS CORs require training in cultural heritage and customary practices in Afghanistan and Iraq, particularly as it relates to accepting gifts; and (3) OCONUS senior leadership needs to be educated about the support and commitment required during the post-award contracting phase. The GAO (2012) validated the lack of senior leadership post-award contract training by stating that “Not all oversight personnel such as commanders and senior leaders receive training to perform contract oversight and management of duties in Afghanistan because such training is not required of them” (p. 2).

2. QASP Training

A second education/training problem concerns the lack of in-depth training on QASPs. A common theme in all the interviews was that CORs (in both CONUS and OCONUS) do not know how to develop meaningful and measurable QASPs, nor do they know how to use the QASP when performing contract oversight. When CORs were asked whether they had ever developed a QASP, and to name key elements of the QASP, three out of four (75%) CORs interviewed said they had not developed a QASP nor could they name the key elements of a QASP. One CONUS COR said, “we use generic statements in the QASP, but the QASPs are not being used because we don’t have the time to do all the inspections to the multiple contracts given the hours available in a day.”

When CORs were asked whether they performed on-site surveillance as prescribed in the QASP, one OCONUS COR responded, “No, I performed surveillance

based on experience of knowing what proper quality assurance is because the contract QASP was generic and did not relate to the task being performed in theater.” Moreover, a recent DOD IG report (2014) discussed how “PEO STRI officials did not adequately monitor and assess contractor performance because contracting officials did not develop an adequate QASP describing methods for on-site quality assurance representatives to assess performance of specific services” (p. 9).

Results of the interviews showed that CORs would like to have COR training on how to develop a detailed QASP that measures performance and they would also like to have a training class that shows CORs how to actually use the QASP in performing contract surveillance. This is certainly an area that the DOD needs to research and expand upon in future COR training offerings.

3. Financial Training

During the interviews, several leaders and commanders of CORs mentioned that CORs are not properly trained in tracking contract financials, such as reviewing contractor invoices and verifying against contractor performance, and tracking contract burn rates. For example, Type B CORs need to be trained in financial management in order to accurately track contract finances. The financial management expertise among Army CORs is often inadequate—one interviewee mentioned that quite often Cost and Price Analysts assist CORs in tracking expenditures and overall contract burn rates.

4. Summary of Results

The effects of Army CONUS and OCONUS CORs not being properly educated and trained makes the Army vulnerable to possibly paying full price without receiving full value for goods and services received. When Army CORs lack the proper training and technical expertise to oversee contracting efforts, it allows contractors to deviate from the contract specifications by cutting corners and using sub-standard materials, which can increase safety and security risks for service members and civilian personnel. Inadequate quality assurance surveillance practices and inadequate technical experience of CORs undermines the entire contracting process and puts Army personnel at risk.

B. COMMUNICATION

Effective communication is essential in the business world and absolutely vital in the Army, given the high risk associated with Army operations. Communication includes verbal, written, and listening skills. Both CONUS and OCONUS CORs must communicate with contracting, quality assurance, legal, contractor, logistics, and other functional area personnel in order for contract administration to be successful. Interview results and previously published reports suggest a need for improved communication on the following topics: (1) transition time between outgoing and incoming CORs; (2) Contracting Officers and CORs; and (3) OCONUS language barriers for CORs.

1. Transition Time

Transitioning between CONUS and OCONUS CORs duties is a challenge that five out of eight interviewees commented on. The main problem is that outgoing CORs are not communicating with the Contracting Officer or the incoming COR. As Army CORs change, they should be communicating pertinent information about the contract administration history, financial and invoicing details, existing oversight and surveillance aspects, and sharing the COR contract file. In order to have a proper transition, communication needs to take place well in advance of the actual turnover. One Commander of OCONUS CORs mentioned that “better transition among OCONUS CORs is necessary, especially if a COR has issues on a high priority service contract as there should be at least two to four weeks of overlap so the new COR can get a better overview of the effort.”

2. Contracting Officer—COR Communication

Inadequate communication between Contracting Officers and CORs continues to be an issue for OCONUS CORs. Both OCONUS CORs commented about the inadequate and untimely communications they experienced with CONUS Contracting Officers. When asked if Contracting Officers provided timely and accurate responses to COR related questions, one OCONUS COR said, “No” while another OCONUS COR said, “the Contracting Officer was not helpful nor available when I needed to talk due to the time difference.” Additionally, an OCONUS COR mentioned that “CONUS Contracting

Officers did not know what was going on in theater nor could they relate to those types of unusual situations.”

Contrary to poor communication between CONUS Contracting Officers and OCONUS CORs, the communication between CONUS Contracting Officers and CONUS CORs is adequate, timely, and accurate information is exchanged. Collaboration between Contracting Officers and CORs is essential to providing effective oversight and surveillance of Army contracts. It is evident that distance matters; and OCONUS CORs are looking for more effective and efficient reach back capabilities from CONUS contracting personnel.

3. OCONUS Language Barriers

Communication challenges exist between NATO service members and CORs in the joint OCONUS environment primarily due to language barriers. NATO service members and foreign nationals work together in theater and although there were some translators, communication remained challenging. One OCONUS Leader said that the language barrier among the Danish soldiers, as well as their misunderstanding or inability to follow regulations, constantly caused issues that prevented them from assisting in contract administration functions.

The effects of communication issues within the Army network can be devastating from a contract administration perspective, especially if CORs are not provided efficient responses to contract and legal questions. Furthermore, if language barriers exist within the network, misunderstandings and accidents can occur that increase the likelihood of security breaches and safety incidents.

C. STAFF LEVELS

To perform proper contract oversight and surveillance, the Army needs sufficient contract administration resources. CONUS and OCONUS CORs are the primary resource; therefore, it is vital that senior leaders and commanders provide adequate personnel to perform contract oversight and surveillance.

Inadequate post-award staff levels of CORs and Quality Assurance Specialists in both CONUS and OCONUS environments were noted during the interviews and in multiple published reports. The GAO (2012) “discovered a significant factor that might contribute to a shortage of CORs is that contract oversight is often assigned a lower priority for units than tasks associated with their primary missions,” likely because “Commanders, particularly those in combat units, do not perceive contract management and oversight as a warfighter task and question the idea that units should be responsible for contract oversight” (p. 25).

During the interviews, both CORs and Leaders and Commanders of CORs cited the problem of inadequate contract oversight staff levels. When asked if CORs were provided adequate time to perform duties, an OCONUS COR responded, “I didn’t have adequate time to do all the CORs duties, I ended up working 14–16 hour days, seven days a week. I was overwhelmed with my priorities. There should have been a COR in country for each of the contracts that I was managing.” Moreover, a military leader of an Army Contract Support Brigade that left Iraq in March 2016 mentioned that “there were a total of 52 service contracts being managed by the brigade; however, only 7 CORs were available to perform oversight,” which equates to each COR overseeing almost 8 contracts.

Inadequate post-award staff levels for contract oversight is prevalent in both CONUS and OCONUS environments. For example, a Leader of CORs also commented during the interview that the Army Contracting Command has a limited number of Quality Assurance (QA) Specialists. QA Specialists assist CORs in QASP development and overall contract surveillance. One CONUS COR with COR responsibilities that are deemed *other duties as assigned* mentioned that he spends approximately 70% of his time doing COR duties instead of his primary position duties because of inadequate time to perform all his duties. A Leader of CORs mentioned that “the majority of sub-par COR performance came from those CORs who performed COR duties *as other duties as assigned* because they were burdened with other job tasks and didn’t have proper time to devote to the COR duties.” These candid statements validate how significant the inadequacy of the contract oversight staff level is within the Army.

The effects of inadequate post-award staff levels are prevalent in both CONUS and OCONUS environments. Insufficient resources to support contract administration functions leads to sub-par goods and services being received, which may present safety and security risks to the Army. Many of the interviewees are hoping that Army leaders will see the value in increasing staff levels in support of contract administration functions so that proper surveillance can be conducted to protect Army interests. After all, the DOD procures the majority of its goods and services through contracted requirements.

D. OVERSIGHT

The processes and contract oversight functions performed by CORs are different in CONUS versus OCONUS environments. CONUS CORs serve as the primary COR, and they handle the bulk of the contract administration (e.g., submitting monthly COR reports; reviewing and approving contractor invoices; tracking Contract Data Requirement Lists (CDRLs); providing annual input to CPARS for contractor performance; and seeking resolutions to contracting issues from the Contracting Officer and relaying that information to the OCONUS COR). Contract oversight and surveillance (e.g., performing physical on-site inspections of contractor performance and quality of product or service against the QASP; inventorying government furnished equipment; and conducting unannounced site-visits to validate personnel levels, security, environmental, safety, and testing procedures) among CONUS CORs tends to not be performed nor supported by leadership as a priority.

On the other hand, OCONUS CORs tend to focus on safety, contract surveillance, and quality assurance, relying on the primary CONUS COR to perform most administrative functions. The administrative duties that OCONUS CORs perform include maintaining the SPOT database, issuing Letters of Authorization (LOAs) to contractors, validating Theater Business Clearances (TBCs), and providing monthly personnel reporting to Central Command (CENTCOM) and higher headquarters. OCONUS CORs also ensure that contractors process through CONUS replacement centers as part of pre- and post-deployment.

Contract oversight is absolutely vital to the DOD and the Army, especially with the high degree of complexity related to the products and services being procured.

CONUS and OCONUS CORs provide contract oversight and surveillance to ensure that the Army is receiving the quality of product or service required by the contract. Figure 1 depicts the three service groups (Knowledge-based; Research and Development; and Facility-related) where the DOD obligated over half of its FY14 contracted service dollars. Notably, during FY14, the DOD obligated more funds to services than it did to products such as aircraft, ships, vehicles, and missiles. Overseeing contracted services requires a tremendous amount of continual quality assurance and surveillance practices in order for the DOD to validate it received the level of service required by contract.

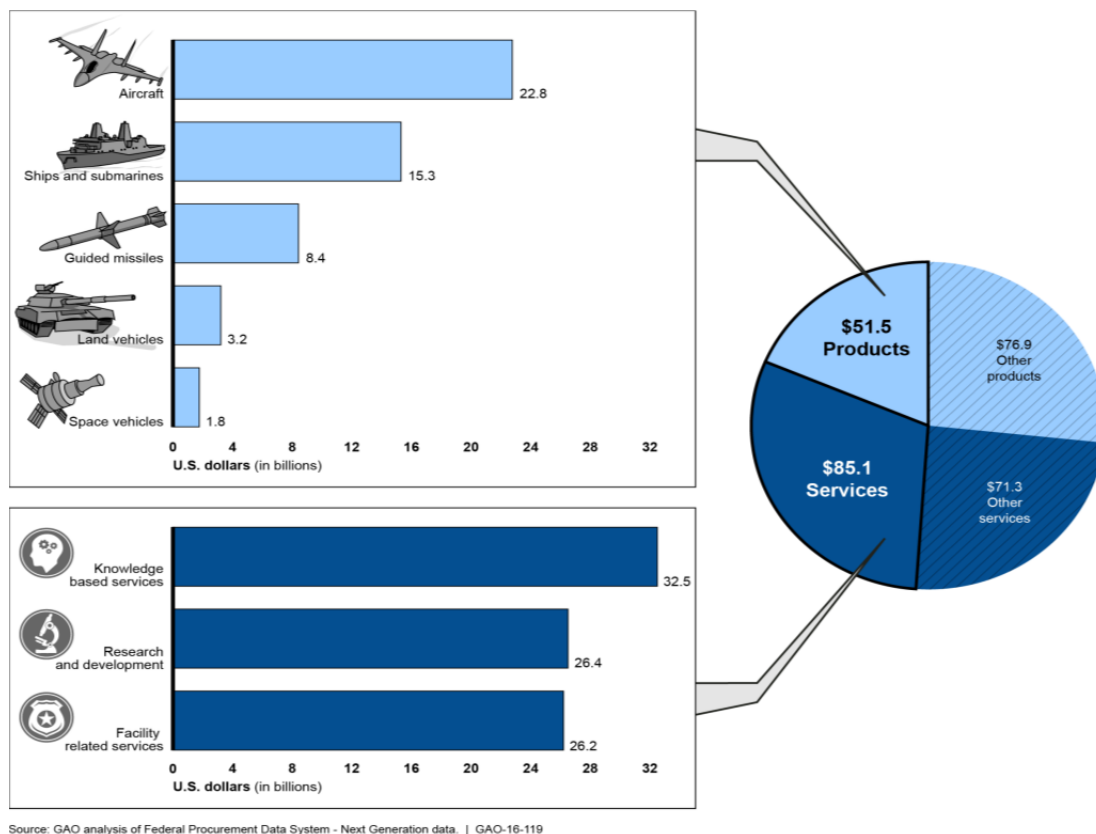


Figure 1. Comparison of DOD Obligations on Contracts for Selected Products and Top Three Portfolio Groups of Services in Fiscal Year 2014. Source: GAO (2016, p. 15).

Contract surveillance is a fundamental duty for CORs and all of the interviews echoed its importance. We asked CORs whether they performed on-site surveillance as prescribed in the QASP, one CONUS COR commented that she did not perform on-site

surveillance as much as she needed to and that most often she relied on other government personnel located at the site of contract performance to assist her in conducting surveillance. Another CONUS COR said that he had not gone out to do surveillance as much as he needed to because of travel funding and authorization issues—leadership priorities do not support contract surveillance. Unfortunately, his response was reaffirmed by other interviewees.

A DOD IG report (2015a) validated the lack of contract oversight among Army contracts, finding that a U.S. Army Corps of Engineers COR for a 2013 services contract “did not effectively monitor contractor performance, specifically the COR only made minimal visits to the project site even though it was visited by quality assurance officials on a regular basis” (p. 1). In addition, a 2015 defense audit found “gaps in Army oversight of the Ebola Fight contract [in which the contract] failed to [have an] acceptable Quality Assurance Surveillance Plan as required by federal regulations [and that] the Army appointed four CORs who had not undergone required training to oversee the contract” (Sege, 2015, p. 1).

Leaders and Commanders of CORs cited a major issue with CORs performing contract oversight in both CONUS and OCONUS environments in which CORs did not always have the technical knowledge needed to oversee contracts. Some Army organizations have OCONUS CORs in theater who oversee technical specifications and report results back to the primary CONUS COR. During the interview, one Commander said, “some of the OCONUS CORs who were appointed to oversee and survey service contracts really didn’t have the technical knowledge to perform surveillance properly.” Many published reports validate this issue. In GAO report (2012), contracting officials noted “that guard towers at a forward operating base [in Afghanistan] were poorly constructed and unsafe to occupy [as] the staircase was unstable and not strong enough for climbing; [whereby], the COR’s inadequate subject area related technical expertise or access to subject matter experts prevented the early identification of the defective welding on the staircase” (p. 19). Unfortunately, officials also mentioned that similar situations occur frequently because of the shortage of CORs with appropriate construction knowledge.

It should be noted that the DOD COR handbook specifically mentions that CORs being nominated to oversee contracts shall have “technical expertise relating to the requirements within the contract, and that [managers] should consider individual skill set and [required technical] experience when identifying a COR” (DPAP, OUSD[AT&L], 2012a, p. 17). Several factors have led to managers overlooking the requirements for CORs to have certain technical qualifications and required experience: (1) the culture within Army leadership has not fully embraced the importance of having technically skilled CORs survey contracts to ensure the USG gets full value; (2) Operational Contract Support (OCS) has not been properly institutionalized within the Army; and (3) the limited number of technically-qualified CORs forced managers to nominate personnel who do not have the appropriate experience and technical knowledge.

The effects of inadequate COR oversight are alarming to DOD and Army officials. Additional funding and rework is necessary to fix defective deliverables so that Army can obtain a functional finished product. The Army becomes vulnerable from a health, safety and security perspective when proper oversight is not conducted, and the potential for fraud, waste, and abuse increases as well. Overall, in instances of inadequate contract oversight, the Army ends up not getting full value for the price paid.

E. LEADERSHIP SUPPORT

All the interviewees agreed that commanders and leaders need to better understand and support contract administration functions. In the GAO report (2011) the Secretary of Defense tried to change the culture and institutionalize OCS. He instructed joint commanders and senior leaders to identify resources to improve OCS in hopes of solving contract oversight issues. The report found that “commanders do not always understand their units’ role and responsibilities to provide contract management and oversight and even question why units should be responsible for contract oversight” (2011, p. 10). Our interview with a Leader of CORs attached to an Army Contract Support Brigade mirrored these results, with the Leader stating, “we constantly experienced combat units struggling to provide CORs to perform contract administration and surveillance duties in Iraq.”

We asked whether they had adequate support and time from their organization to perform COR duties, a CONUS COR responded “my leadership never asked about the status of the duties I was performing, nor did my supervisor understand what I was doing as a COR, so leadership did not support or help me.” Another CONUS COR said, “No, because leadership priorities do not support contract surveillance.” An OCONUS COR responded, “Yes,” primarily because of the Liaison Officer duties he was performing in addition to COR duties, but he further explained that his CONUS leader neither had a clue about his responsibilities as a COR nor his duties in theater. Several CORs made similar comments, contending that managers who have never been a COR do not understand the roles and responsibilities of CORs and therefore cannot relate. We asked Leaders and Commanders of CORs whether they had served as a COR—only one out of four had. So the majority of Leaders and Commanders of CORs have never been a COR, which validates the comments we heard from the CORs.

Commanders and leaders certainly have influence over their personnel. Commanders and leaders expect CORs to perform duties outside of their normal chain of command at different locations and sometimes senior leaders pressure CORs into performing unauthorized and potentially unethical duties. A GAO report (2008) found that “contracting personnel, including CORs, are sometimes placed in positions where their direct supervisor is not in the contracting chain-of-command, thus possibly injecting risk into the integrity of the contracting process” (p. 10). In a follow-up interview question about controlling fraud, a Leader of CORs talked about how the lines of authority need to be better defined, especially if a commander or leader uses their position and ultimate authority to get a COR to do what they want (above and beyond the requirements in the contract). The interviews revealed that a lot of CORs suffer from command influence, where senior leaders tell CORs to get the job done. This form of influence and pressure affects both CONUS and OCONUS CORs.

A final leadership area that has been problematic for contract administration involves a 2013 DOD Instruction 5010.40 entitled “Managers’ Internal Control Program Procedures.” This instruction requires DOD organizations to develop internal controls to verify that programs are functioning as intended. The DOD IG (2014) cited PEO STRI for

having “internal control weaknesses in contract administration and oversight” and further stated that “PEO STRI contracting personnel did not have controls [in place] to adequately monitor and assess the contractor’s performance” (p. 3). Monitoring and assessing contractor performance is a duty of contract oversight and surveillance which is performed by CORs. Although this finding involves inadequate oversight, DOD IG made a precedent in this case by finding the PEO STRI leadership ultimately responsible. During the interviews, the interviewees were evidently aware of this DOD Instruction, as they made comments about processes and procedures they used: procedures for controlling fraud; procedures for invoice review and contractor payment, etc.

Commanders and leaders can have both positive and negative effects on the contract administration process. Commanders and leaders who use their influence in a positive way by reinforcing high ethical standards can help to reduce fraud and make the contract administration process run more efficiently. However, when commanders and leaders do not communicate to CORs and provide the necessary support, they can ultimately weaken the integrity of contract oversight and surveillance practices.

F. SUMMARY

Our analysis found five common COR issues that must be addressed. First, education/training should focus on appropriate training of CORs for OCONUS operations and ensuring all CORs understand how to write and use a QASP. Second, Contracting Officers and CORs need to properly communicate; and transition time between incoming and outgoing CORs needs to be lengthened. Third, adequate staff levels need to be established and maintained for CORs and Quality Assurance Specialists. Fourth, adequate contract oversight practices need to be identified and supported by leadership; and leadership needs to thoughtfully nominate CORs, validating that they possess the required technical expertise. Finally, leadership needs to communicate and provide adequate support to CORs to ensure positive outcomes during the contract administration process. Each of these trends are areas for improvement. The implications of these findings will be discussed in Chapter V.

V. CONCLUSIONS AND RECOMMENDATIONS

This Joint Applied Project analyzed Army contract administration procedures in CONUS and OCONUS environments performed by CORs overseeing service contracts. The project explored COR roles, responsibilities, education/training, communication, contract administration staff levels, oversight, and leadership support. The initial chapters explored Army contract administration procedures relating to the COR functions by exploring federal, DOD, and Army regulations, policies, guides, and training. We analyzed published COR-related reports and we identified COR trends. Later chapters validated those trends by using interviews to identify five common areas of contract administration issues: education/training, communication, staff levels, oversight, and leadership support.

An overarching conclusion to this research is that Army contract administration practices are different in CONUS and OCONUS environments. The COR's roles, responsibilities, training, and communication practices are different depending on whether the COR is functioning in a CONUS or OCONUS environment. Additionally, contract administration staff levels, oversight, and leadership involvement are different depending on the COR's environment. This chapter summarizes answers to the research questions posed in Chapter I. We provide specific and attainable recommendations to improve Army contract administration procedures in CONUS and OCONUS environments. Finally, we identify potential areas for further research.

A. ANSWERS TO RESEARCH QUESTIONS

1. Are COR Processes and Training Different or the Same in CONUS and OCONUS Environments?

We found that COR training is different in CONUS and OCONUS environments. Education and training requirements are different primarily because OCONUS CORs are required to take additional training. Better contract quality assurance outcomes require CORs to be fully knowledgeable in their functional area and be good communicators. Currently, to ensure that OCONUS CORs get sufficient operational knowledge of

contracting, Army Contracting Command-Kuwait provides theater-specific COR training which augments the mandatory COR training.

The processes and contract oversight functions performed by CORs are also different in CONUS and OCONUS environments. CONUS CORs perform the administrative functions of being a COR quite well, while OCONUS CORs tend to focus on safety, technical oversight, contract surveillance, and quality assurance. Improvement of the functions not being routinely performed by CONUS and OCONUS CORs is recommended. CONUS CORs should be performing technical oversight and contract surveillance in addition to the administrative functions they already perform. The current model being used for contracts that require COR oversight in CONUS and OCONUS environments should become the standard where OCONUS CORs and CONUS CORs perform specific contract administration duties. Leadership support in increasing COR staff levels will help fulfill this recommendation.

2. What Are the Lessons Learned/Best Practices in Overseeing Army CONUS and OCONUS Service Contracts?

First, inadequate COR training may be detrimental to the Army's mission, as CORs provide oversight to important CONUS and OCONUS service contracts (i.e., troop support contracts). Second, communication problems exist between CONUS contracting staff and OCONUS CORs, which requires improvement so that OCONUS CORs have accurate and timely advice to perform their duties.

Third, staff levels to support the contract administration function of CORs providing contract oversight in CONUS and OCONUS environments are inadequate. Although there is no specific guidance published that outlines the number of contracts a COR can be responsible for, the COR handbook advises that the requiring organization must allow adequate resources for the COR to perform duties. Adequate resources include people, time, equipment, training, funding, and opportunity. Without the proper staff levels to perform contract administration, it will be difficult for the government to determine whether the contractor was properly executing the contract requirements.

Fourth, managers are nominating CORs who do not possess the required technical knowledge and experience to perform proper contract surveillance and oversight. The success or failure of a contract can be dependent on having technically skilled and knowledgeable CORs ensuring that contractors are performing to the terms and conditions of the contract. Finally, the fifth lesson learned involves commanders and leaders not understanding the requirements needed to support the contract administration phase, not understanding COR roles and responsibilities, and not wanting to commit resources to support contract administration. Support for contracting must come from top leaders who understand the contracting phases and functions and can relay that support down to lower levels.

3. What Are the Relative Advantages and Disadvantages of CORs Performing Administration on Army Contracts in CONUS and OCONUS?

Several relative advantages of CORs performing administration on Army contracts in both CONUS and OCONUS environments exist. CORs add value to the contract administration process because they perform contract oversight to ensure the contractor is performing effectively based on the terms and conditions of the contract. In performing contract surveillance, CORs provide valuable feedback to the Contracting Officer so that contract cost, schedule, and performance can be managed to ensure positive outcomes.

The primary disadvantages of CORs performing administration on Army contracts in both CONUS and OCONUS environments comes from inadequate resources (people, time, equipment, training, funding, and opportunity) to perform contract surveillance, an insufficient number of CORs performing oversight, and CORs lacking technical experience. Other disadvantages include a lack of operational chain-of-command support for CORs to perform contract surveillance and commanders/senior leaders failing to understand COR roles and responsibilities.

B. RECOMMENDATIONS

The COR is the technical representative who must communicate with the contracting officer and contract personnel to ensure satisfactory performance and timely delivery of goods and services as set forth in contracts. The COR's role has never been as challenging as it is today, highlighting the need for the most up-to-date and realistic training prior to appointment. The acquisition environment in which CORs function is complex—being trained, technically skilled, and resourced appropriately leads to positive contract outcomes. Further, proper management and support for CORs is critical—it can make the difference between contract success and failure. As a result of our research, we recommend several improvements to contract administration procedures in CONUS and OCONUS environments.

First, we recommend all CORs read and use the following materials:

- The COR Dos and Don'ts—Contract Administration and Remedies Checklist: (DPAP, OUSD[AT&L], 2012a, p. 184). The checklist is provided at Appendix G.
- DOD Best Practice Checklist for COR Surveillance Checklist: (DPAP, OUSD[AT&L], 2012b, p. 195). The checklist is provided at Appendix H.
- DOD Contracting Officer Representative Tracking (CORT) application. CORs can access this application through Wide Area Work Flow (WAWF) at <https://wawf.eb.mil>.

Second, we recommend the following changes identified in the five common areas of concern:

(1) Education/Training

COR training needs to be standardized. Currently, if you ask an OCONUS representative the COR training requirements, you will get an answer that differs from a CONUS representative. Senior leaders from all services need to understand post-award contracting requirements as part of their pre-deployment preparation training. This training is available through the Army Logistics University at Ft. Belvoir, VA. The course is informally known as the "3C" course; however, its proper name is the

Operational Contract Support (OCS) course. Leaders need to know about contract administration and COR roles and responsibilities. OCS should be mandatory training for all service leaders, especially with the amount of contracting occurring in theater.

Further, the DOD should update COR training material by expanding upon the following areas: QASP development and usage; Contingency COR course; Financial Management for CORs; and SPOT adjudicating and security measures. The current DAU Ethics training needs to be updated to include a scenario that educates OCONUS CORs about cultural heritage and customary practices in Afghanistan and Iraq, particularly as it relates to accepting gifts. Army Contracting needs to educate and train senior leadership about the support and commitment required during the post-award contracting phase in both CONUS and OCONUS environments.

(2) Communication

The COR should constantly communicate and interact with the contractor to troubleshoot and resolve issues to keep contracts on schedule with good performance. The Army should establish an Army COR Transition Plan for all CORs. The outgoing and incoming COR should have at least 2–4 weeks of overlap so that the incoming COR can be briefed on the contract status, problem areas, and meet the contractor staff for each contract. For better transition among OCONUS CORs, incoming CORs should be assigned a sponsor, provided a pre-deployment checklist, provided a required training list, and the outgoing COR should be communicating and providing the PWSs and QASPs for transitioning contracts to allow for proper transition of contract administration functions and for better overall understanding of the contracts under the COR's purview.

(3) Staff Levels

The Army should increase the number of CORs and Quality Assurance Specialists in both CONUS and OCONUS environments to allow for proper contract oversight and surveillance. Quality Assurance Specialists assist CORs in QASP development and overall contract surveillance practices. We recommend that a COR be assigned to no more than four contract efforts at any given time. This 1:4 ratio will provide CORs the time needed to thoroughly understand each contract they oversee, and

to be able to keep up with the demanding inspection requirements. This ratio will also allow CORs to perform their duties under realistic expectations, which could create more positive outcomes.

(4) Oversight

For contracts that require COR oversight in CONUS and OCONUS environments, two CORs should be appointed on the contract: one to perform OCONUS technical oversight, surveillance, and Government Furnished Equipment (GFE) tracking in theater, and another to perform CONUS oversight and administrative tasks. Quality Assurance Specialists should be embedded throughout all Army contracting offices to assist CORs in QASP development and contract surveillance.

(5) Leadership Support

First, commanders, leaders, and supervisors need to better understand and support COR-related contract administration functions. Second, commanders and leaders should provide proper funding on the contracts so that CORs can travel to perform proper contract oversight and surveillance. Third, the DAU or the Army should establish a 24x7 COR hotline where CORs can get immediate answers to contracting or legal questions. Fourth, more emphasis needs to be placed on COR duties and accountability, especially since COR duties are assigned as secondary duties to civilian and military members. Fifth, the contract administration support CORs provide needs to be a part of both military and civilian annual performance ratings.

(6) Summary

These recommendations are specific and can be accomplished in a time-phased approach, but they do require Army Headquarters level support.

C. AREAS FOR FURTHER RESEARCH

Through the process of performing this research, we found three potential areas for further research. First, future researchers should explore the processes used by the Assistant Secretary of the Army for Acquisition Logistics and Technology (ASA ALT) in Afghanistan on becoming a COR in theater, as there is a dedicated group of trainees who

require different training and theater-specific qualifications than provided in the DOD Standard training for CORs.

Second, future researchers should examine the current status of controlling fraud in contingency operations. DOD has placed great emphasis on this area through continued education and vigilance—it would be useful to compare our current fraud status (e.g., number of cases, severity of cases, etc.) to our past fraud status. Army Contracting Command has taken the approach of constantly communicating and interacting with CORs, reminding them they should operate by the highest ethical standards, and to avoid doing something that feels improper.

Third, future researchers should perform an analysis of why some Army organizations appoint CORs as a full-time position while others appoint CORs as part-time, or “other duties as assigned.” The analysis can determine whether the full-time CORs performed better (e.g., better performance monitoring, more successful contract outcomes, better control of fraud and waste, etc.) than their part-time counterparts, providing rationale for keeping the status quo or moving toward more full-time positions.

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APPENDIX A. COR RESPONSIBILITIES

Table 4. Examples of COR Responsibilities. Source: DOD (2015, pp. 23–26)

1. Complete the OGE Form 450 (if designated as a filer by the contracting officer) and other DOD Component directed documentation. The contracting officer will accept the certification of the COR management stating that there are no personal conflicts of interest unless DOD Component procedures require additional documentation.
2. Participate, as appropriate, in pre-award requirements definition, acquisition planning, and contract formation processes (i.e., market research, independent government cost estimate, justification and approval documentation).
3. Establish and maintain a COR contract file in accordance with agency or DOD Component procedures. The COR file will, at a minimum and as applicable based on responsibilities designated, include copies of: (a) COR letter of designation from the contracting officer. (b) Signed contract and modifications. (c) Quality assurance surveillance plan or other performance surveillance plan. (d) Written communications with the contractor and the contracting officer. (e) Trip reports. (f) Documentation of telephone conversations and meetings with the contractor and the contracting officer. (g) Surveillance documents. (h) Invoice and payment documentation. (i) Documentation required to record, evaluate, and report contractor's performance.
4. Ensure the necessary requirements are met for contractor background checks and all other required security clearances (if applicable).
5. Maintain liaison and direct communications with the contractor, contracting officer, COR management and other authorized representatives related to the contract or project.
6. Participate in meetings and discussions as requested by the contracting officer (e.g., post-award orientation conferences, negotiations).
7. Assure the changes in work under a contract are not implemented before written authorization or a contract modification is issued by the contracting officer.
8. If authorized, recommend changes in scope or technical provisions of the contract, order, or agreement with written justification for the proposed action to the contracting officer.
9. Provide clarification of technical requirements to the contractor, as necessary, without making changes or agreeing to make changes to the contract, task or delivery order, or agreement.
10. Coordinate with the contractor and contracting officer to resolve issues and monitor corrective actions.
11. Do not direct or supervise contractor employees, interfere with the manner in which the contractor assigns work, or interfere with the contractor's relations with organized labor.
12. Assist the contracting officer with close-out of contracts, orders, or agreements, especially with the orderly transition or completion of work as contractor work effort is phased out.
13. Ensure COR files are provided to the contracting officer during contract close-out.

14. Serve as the central point of contact to assure that any government obligations stated in the solicitation are completed (e.g., government furnished property is in place, submittals are reviewed for approval, plans or procedures required by the performance work statement are obtained).
15. If COR designation is terminated before the contract is completed, ensure that all relevant information for the contract is turned over to the new COR, once he or she is designated.
16. Refer any request from a contractor for the release of information to the contracting officer.
17. Review contractor quality control plans and recommend changes or acceptance to the contracting officer.
18. Ensure contractors comply with procedures on making restrictive markings on data, if applicable.
19. Recognize and report organizational conflicts of interest to the contracting officer.
20. Monitor contractor compliance with safety (i.e., Occupational Safety & Health Administration), security, labor (i.e., 351–357 of Title 41, United States Code, also known as “Service Contract Act of 1965” (Reference (I))), and environmental law and regulatory requirements, as applicable.
21. Ensure all contractors that were Sensitive Compartmented Information indoctrinated are debriefed and reported to the cognizant security office.
22. Assist the contracting officer in negotiating any proposed increases or decreases in scope of work by providing independent cost estimates and technical evaluations on request.
23. Monitor contractor performance and ensure that the contractor performs the requirements of the contract or order or agreement in accordance with the terms, conditions, and specifications. This includes ensuring that all required items, documentation, data, and reports are properly and timely submitted as contractually required.
24. For a performance-based services contract, order, or agreement, perform on-site surveillance in accordance with the QASP or performance assessment plan, as applicable. Assure technical proficiency and compliance with the technical provisions of the contract or order or agreement by reviewing and verifying the performance of work accomplished by the contractor.
25. Notify the contractor of deficiencies observed during surveillance (e.g., anticipated performance failures, late deliveries, non-conforming work, security violations, hazardous working conditions, improper use of government material) and recommend appropriate action to the contracting officer to effect correction, as applicable.
26. Review contractor requests for travel, overtime, government assets, or subcontracting, in a timely manner, and forward to the contracting officer for approval.
27. Review and analyze the contractor’s deliverables, service, and management reports.
28. Monitor and track contract obligations and expenditures per accounting classification reference number and contract line item numbers for each contract or order or agreement.
29. Monitor fund limitations and expenditures on cost reimbursement, time and materials (T&M) and labor-hour (LH) contracts. Only the contracting officer can make changes to the contract or order or agreement.
30. Under T&M and LH contracts, assure that the contractor uses the appropriate level of qualified personnel as specified in the contract, order, or agreement.
31. Provide input on contractor performance to the award fee board.
32. Ensure contracting officer is notified by the contractor of any anticipated cost overruns or under runs for cost reimbursement contracts.

33. Inspect deliverables and monitor services for conformance with terms and conditions. Accept or reject the deliverables or services. Ensure compliance and completion by the contractor of all required operations, including the preparation of the DD Forms 250 (250-1) "Material Inspection and Receiving Reports," or equivalent, which will be authenticated and certified by the COR that the services and supplies have been received and are acceptable. Process inspection report through the WAWF as supporting documentation for payment.
34. Document inspections performed including disposition of the results.
35. Report to the contracting officer on contract completion or final delivery.
36. Adhere to the invoice and payment clause in the contract.
37. Review interim invoices (e.g., cost reimbursement, T&M and LH contracts) to make sure charges are commensurate with observed performance (i.e., travel was necessary and actually occurred, labor hours charged are commensurate with level of work performed). Pursuant to section 242.803(b) of Reference (f), the contract auditor (Defense Contract Audit Agency (DCAA)) is the authorized representative of the contracting officer for approving interim vouchers for payment under DOD cost-reimbursement, T&M and LH contracts. Coordinate issues of cost with DCAA (through contracting officer) who is authorized to approve these invoices.
38. Report any discrepancies in invoices to the contracting officer and provide documentation to support the representation.
39. Review and approve invoices for fixed-price deliverables.
40. Process payment requests in a timely manner in accordance with chapter 39 of Title 31, United States Code, also known as "The Prompt Payment Act" (Reference (m)).
41. Coordinate and provide any government-owned (or leased) assets or use of U.S. Government space to the contractor as required by the contract.
42. Monitor the control and disposition of any government-furnished assets. Ensure the completion of all required documentation for the acceptance, use, and return of government-furnished assets, including unique identification tracking.
43. Provide to the contracting officer an assessment of any loss, damage, or destruction of U.S. Government property.
44. Perform joint equipment inventories with the contractor at award, annually, and at close-out.
45. Monitor contractor's performance measurement program, ensuring compliance with earned value management and cost performance reporting.
46. Evaluate, for adequacy, the contractor's engineering efforts and management systems that relate to design, development, production, engineering changes, subcontractors, tests, management of engineering resources, reliability and maintainability, data control systems, configuration management, and independent research and development. Evaluation of configuration management processes is the duty of the cognizant configuration manager.
47. Conduct reviews of value engineering change proposals.
48. Discuss and coordinate with the contractor's representatives concerning clarification of drawings, specifications and performance parameters.
49. Understand local culture, operating environment, and how it may affect behavior, perspective and the ability to function as a COR.
50. Be aware of and report potential instances of bribery, kickbacks, and other illegal acts to the contracting officer and the appropriate investigative office.
51. Understand rules of engagement within deployed area of responsibility.
52. Determine the items to be included (i.e., government equipment and facilities) in the letters of authorization for contracting officer approval.

53. Develop and update a continuity file for turnover to a new COR.
54. Participate in any specialized contingency training before or during mobilization.
55. Ensure the contractor complies with all notification requirements and safety procedures at the occurrence of a hazardous event.
56. For any hazardous event, immediately notify the appropriate officials, and then notify the contracting officer.
57. Complete all required hazardous material handling training.
58. Document contractor performance in the CPARS.
59. Maintain surveillance over contractor compliance with CTIP requirements.

APPENDIX B. DESCRIPTIONS OF REQUIRED COR TRAINING.

COR with a Mission Focus (DAU CLC 106) provides the student with general knowledge of being a COR by explaining the duties CORs perform in the DOD acquisition environment; **Contracting Officer's Representative (DAU CLC 222)** training provides students the knowledge relating to COR roles and responsibilities in performing the technical surveillance of contractor performance; **Ethics for AT&L Workforce (DAU CLM-003)** provides students with knowledge of legal ethical standards concerning communications between government personnel and contractors; **Combatting Trafficking in Persons (CTIP) Awareness** training covers the frank and candid realities of trafficking in persons (TIP) around the world; **Invoicing, Receipt, Acceptance, and Property Transfer (IRAPT)** training provides knowledge about the web-based system used by contractors and CORs for electronic invoicing, receipt and acceptance; and **DOD CORT Tool** training provides knowledge on the web-based system for the appointment of CORs allowing "prospective CORs, COR Supervisors and Contracting Officers to electronically process the nomination and appointment of CORs for one or multiple contracts" (DPAP, OUSD[AT&L], 2012b, p. 31). Optional training descriptions are provided: **Contingency Environment (DAU CLC 206)** provides knowledge of "the basics of contracting, along with the ethical situations and cultural differences a COR may experience while deployed in a contingency environment" (Nguyen, 2011, p. 32); and **Synchronized Pre-deployment and Operational Tracker (SPOT)** is a joint web application designed for the management of contract efforts and personnel who accompany U.S. forces in theater. SPOT training provides CORs with the knowledge to "verify [contracted personnel's] identity for use of DOD's facilities, track contractor personnel movements, and determine eligibility of DOD support services" (DPAP, OUSD[AT&L], 2012b, pp. 30–31).

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APPENDIX C. ADDITIONAL ARMY COR TRAINING

Operations Security (OPSEC) provides information about protecting unclassified information relating to operations and personal information to ensure safe and successful military missions. CORs need to possess operational security knowledge in order to protect contract information so that military operations are not compromised. **Contractor Performance Assessment Reporting System (CPARS)** training provides CORs with knowledge to create, review, and submit annual contractor performance assessments and evaluations per FAR 42. The CPARS system is the mandatory web based application where CORs enter annual contractor performance information. **Contractor Manpower Reporting Application (CMRA)** training provides CORs with the knowledge to review and confirm contractor information within the CMRA web based application. CORs are required to annually validate that the contractor has completed information such as funding, contract, labor hours, costs, organization supported, and function performed which are known as National Defense Authorization Act (NDAA) elements. **Electronic Document Access (EDA)** knowledge allows CORs to access this web-based application 24/7 by providing “view-only” access and retrieval of contracts and vendor payment information, as well as, creating Contract Deficiency Reports. **Local Vendor Base** training provides CORs with knowledge of vendor capacity and skill sets for a given region. This training is provided in theater and is beneficial to CORs in order to know region specific vendor capabilities especially for unique procurements. **Survival Evasion Resistance and Escape (SERE)** training provides OCONUS CORs with the knowledge and tactics to survive, evade, resist, and escape if taken captive while serving in a contingency environment. **Country specific pre-deployment** training provides OCONUS CORs with up-to-date information such as on-going threats, customs, culture, and acceptable practices for the country they will be serving in. Language/dialect training provides COR with the skill to understand and communicate based on the country they will be serving in. CORs must be able to verbally communicate with local vendors in a given country. **Status of Forces Agreement (SOFA)** knowledge is vital to an OCONUS COR because status protections must be in

place with a host nation to define, account for, and protect procedural rights of U.S. DOD personnel supporting mission requirements. The DOD (2011) requires “planners, requiring activities, [and] contracting officers [to] review applicable SOFAs and related agreements to determine their effect on the status and use of contractors in support of applicable contingency operations” (p.11). **Theater Business Clearance (TBC)** knowledge is essential for OCONUS CORs as they need to be able to verify contract personnel arriving in theater against actual contract personnel authorizations for services being performed. Additionally, CORs need to review the contract to ensure that mandatory CENTCOM clauses are included for in theater contract administration provisions.

APPENDIX D. INTERVIEW QUESTIONS—CORs.

1. What role and responsibilities do you perform being a COR?
2. How were you officially appointed to be a COR?
3. As a COR, how did you help facilitate the surveillance of Army service and developmental contracts in CONUS or OCONUS?
4. Are you aware of COR processes being different or the same in CONUS or OCONUS environments?
5. Did you receive adequate COR training to perform COR duties either in a CONUS or OCONUS environment?
6. If you have served as an OCONUS COR, did you receive COR OCONUS specific training prior to deployment?
7. What contract administration and surveillance duties for CONUS or OCONUS efforts did perform?
8. Were you provided adequate time to perform your COR duties?
9. Do you approve invoices as a COR for CONUS or OCONUS actions? If so, do you find the automated COR invoicing system adequate?
10. Did you submit timely COR monthly reports to the Contracting Officer? If so, did you note any issues and were those issues acted upon by leadership? Did you submit monthly reports into an on-line database or did you email reports to the Contracting Officer?
11. Have you ever developed a Quality Assurance Surveillance Plan (QASP)? If so, what were the key elements of that document?
12. For delivery or task order contracts that you provide contract administration on, do you use a standard or specific QASP for each task/deliver order?
13. Did you perform on-site surveillance as prescribed in the QASP?
14. Did your organization allow you to travel to perform on-site contract surveillance?
15. As a COR, have you been involved in any contract disputes or cases of fraud? If so, explain.

16. Were the COR duties you were appointed to perform viewed within your organization as “other duties as assigned” or were your COR duties listed in your annual performance objectives?
17. Did Contracting Officers provide timely and accurate responses to any COR related questions you might have had?
18. Did you receive adequate support and time from your organization to perform COR duties?
19. Do you receive system reminders or is it the COR’s responsibility to keep training certifications up to date?
20. What COR reference document or policy do you refer to quite often for COR guidance?
21. Were you provided a conformed (fully signed) copy of your official COR appointment letter?
22. Were you provided a copy of the contract you provided COR support to?
23. As a COR, how many simultaneously active contracts (task orders) were you responsible for in performing contract administration duties?
24. As a COR, have you ever had any Technical Monitors assigned to the same contract?

APPENDIX E. INTERVIEW QUESTIONS—LEADERS OF CORs.

1. What are the lessons learned in overseeing Army service and developmental contracts in CONUS or OCONUS?
2. What are the relative advantages and disadvantages of CORs performing administration on Army contracts in CONUS or OCONUS?
3. Are you familiar with the roles and responsibilities of CORs in a CONUS or OCONUS environment?
4. Are you familiar with the required COR training differences in a CONUS or OCONUS environment?
5. Have you ever officially served as a COR? If so, was it in a CONUS or OCONUS environment?
6. Was it mandatory for you to be COR trained prior to overseeing CORs in CONUS or OCONUS?
7. In providing oversight and leadership to the CORs performing contract administration duties within your organization, was there any fraud committed? If so, please explain further.
8. How does your organization control fraud with regards to CORs performing contract administration and surveillance?
9. Have you ever approved CONUS or OCONUS contractor invoices for payment? If so, how did you confirm that the goods or services were received?
10. Do you review and approved Quality Assurance Surveillance Plans (QASPs) within your organization?
11. What key aspects of the QASP do you look for to ensure sound surveillance practices are conducted?
12. Within your organization, are COR duties viewed as “other duties as assigned” or do you ensure that COR duties are listed in their annual performance objectives?

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APPENDIX F. INTERVIEW QUESTIONS—COMMANDERS OF CORs.

1. What are the lessons learned in overseeing Army service and developmental contracts in CONUS and OCONUS?
2. What are the relative advantages and disadvantages of CORs performing administration on Army contracts in CONUS or OCONUS?
3. Are you familiar with the roles and responsibilities of CORs in a CONUS or OCONUS environment?
4. Have you ever officially served as a COR? If so, was it in a CONUS or OCONUS environment?
5. Was it mandatory for you to be COR trained prior to overseeing Army service and developmental contracts in CONUS or OCONUS?
6. Was there any fraud committed with regards to CORs performing contract administration duties under your command? If so, please explain further.
7. How did your unit control fraud with regards to CORs performing contract administration and surveillance?
8. What do you foresee being the most concerning challenge of CORs providing contract administration and surveillance in CONUS and OCONUS environments?

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APPENDIX G. CHECKLIST FOR CONTRACT ADMINISTRATION AND REMEDIES

Table 5. DOS and DON'Ts of Contract Administration and Remedies.
Source: DPAP, OUSD(AT&L) (2012a, p. 184)

CONTRACT ADMINISTRATION	
DO	DON'T
Remember that the COR is an agent of the U.S. Government, with only the authority delegated by the Contracting Officer.	Accept less than what is required by the contract.
Get the names of contractor personnel authorized to represent the contractor.	Assume an interpretation of ambiguous contract language, which would be favorable to the Government. Remember: if the contractor's interpretation is reasonable, it will prevail.
Find out the specific authority of contractor personnel. Does the person you are dealing with have the authority to obligate the contractor?	Hold up payment unless performance is deficient or defective.
See that all Government approvals or consents are timely.	Accept supplies or services without complete inspection.
	Make any change, modification, deletions, or additions to the contract requirements. Work through the Contracting Officer.
	Automatically consider all contractor claims unreasonable. Be fair and impartial.

REMEDIES	
DO	DON'T
Exercise Government rights, such as warranties. Make sure to deal with any problems before the warranty period runs out.	Act without consulting the contracting officer. Work through the contract administration team.
Work with the contracting personnel to prevent problems before they arise.	Allow interim or final delivery dates to be waived.
Take actions to protect Government rights before delivery is due.	

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APPENDIX H. CHECKLIST FOR COR SURVEILLANCE

Table 6. Checklist. Source: DPAP, OUSD(AT&L) (2012b, p. 195)

	Is the COR maintaining a separate file for each contract?
	Is the file clearly indexed to enable ready access to pertinent records?
	Has the COR been trained within the past 3 years, and is the certificate present?
	Is a copy of the COR's letter of appointment/designation in the file?
	• Does the COR file include the following items? • Copy of the contract • All modifications • All invoices • All DD 250s • Deficiency reports • Copy of QASP • Copy of required regulations • Memoranda for the record and other correspondence and e-mails • Surveillance checklist • Surveillance schedule • Environmental Plan • Maintenance Plan • Work Plan • GFP inventory • Safety Plan • Test reports • GFP validation
	Has the COR reported contractor full-time equivalents (CFTEs) or validated the contractor's input? ⁴⁵
	If the COR is responsible for contractor performance reporting, has the COR completed CPARS report inputs?
	Has the COR performed contractor surveillance and site visits?
	Are the results of the surveillance and inspections documented?
	Does the COR complete a periodic contract performance report and forward it to the contracting officer?

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