



NAVAL POSTGRADUATE SCHOOL

MONTEREY, CALIFORNIA

CAPSTONE APPLIED PROJECT REPORT

PROCUREMENT LEAD TIMES: AN ANALYSIS OF THE PARTIAL FORMAL DEFINITION, ACTUAL LEAD TIMES, AND TRACKING MECHANISMS

June 2023

By: Pamela S. Funk

Advisor: Kelley Poree
Co-Advisor: Roderick Matthews,
Army Contracting Command-Redstone Arsenal

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REPORT DOCUMENTATION PAGE			<i>Form Approved OMB No. 0704-0188</i>	
Public reporting burden for this collection of information is estimated to average 1 hour per response, including the time for reviewing instruction, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Washington headquarters Services, Directorate for Information Operations and Reports, 1215 Jefferson Davis Highway, Suite 1204, Arlington, VA 22202-4302, and to the Office of Management and Budget, Paperwork Reduction Project (0704-0188) Washington, DC 20503.				
1. AGENCY USE ONLY (Leave blank)		2. REPORT DATE June 2023	3. REPORT TYPE AND DATES COVERED Capstone Applied Project Report	
4. TITLE AND SUBTITLE PROCUREMENT LEAD TIMES: AN ANALYSIS OF THE PARTIAL FORMAL DEFINITION, ACTUAL LEAD TIMES, AND TRACKING MECHANISMS			5. FUNDING NUMBERS	
6. AUTHOR(S) Pamela S. Funk				
7. PERFORMING ORGANIZATION NAME(S) AND ADDRESS(ES) Naval Postgraduate School Monterey, CA 93943-5000			8. PERFORMING ORGANIZATION REPORT NUMBER	
9. SPONSORING / MONITORING AGENCY NAME(S) AND ADDRESS(ES) N/A			10. SPONSORING / MONITORING AGENCY REPORT NUMBER	
11. SUPPLEMENTARY NOTES The views expressed in this thesis are those of the author and do not reflect the official policy or position of the Department of Defense or the U.S. Government.				
12a. DISTRIBUTION / AVAILABILITY STATEMENT Approved for public release. Distribution is unlimited.			12b. DISTRIBUTION CODE A	
13. ABSTRACT (maximum 200 words) In January 2021, a formal definition of procurement administrative lead time (PALT) was issued. This formal definition includes the beginning and end stages of PALT for various contract actions yet excludes a definition for the full acquisition lead time cycle. The formal definition also includes a proposed PALT tracking mechanism that would report PALT to the public. A review of the delta between the formal PALT definition and how PALT is measured at Army Contracting Command-Redstone Arsenal (ACC-RSA) is conducted. The proposed reporting mechanism is also reviewed for accuracy and viability to achieve the goal of governmental transparency into PALT. An in-depth assessment of a small subset of ACC-RSA data is conducted. The findings of this research indicate that the formal definition of PALT does not capture requisite actions performed by the contracting offices and may be reporting inaccurate information in the proposed tracking mechanism. Recommendations include a review of the formal PALT definition for the applicability of regulations at all levels to which it applies and a review of the proposed tracking mechanism to identify additional options. Finally, it is recommended that the full spectrum of the acquisition cycle, from identification of the requirement through award or delivery, also be investigated and defined to understand the proper placement of PALT within this cycle.				
14. SUBJECT TERMS acquisition requirements lead time, ARLT, procurement administrative lead time, PALT, acquisition lead time, ALT, lead time, federal procurement data system, FPDS, procurement integrated enterprise environment, PIEE, paperless contract files, PCF			15. NUMBER OF PAGES 93	
			16. PRICE CODE	
17. SECURITY CLASSIFICATION OF REPORT Unclassified	18. SECURITY CLASSIFICATION OF THIS PAGE Unclassified	19. SECURITY CLASSIFICATION OF ABSTRACT Unclassified	20. LIMITATION OF ABSTRACT UU	

NSN 7540-01-280-5500

Standard Form 298 (Rev. 2-89)
Prescribed by ANSI Std. Z39-18

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AN ANALYSIS OF THE PARTIAL FORMAL DEFINITION,
ACTUAL LEAD TIMES, AND TRACKING MECHANISMS**

Pamela S. Funk, Civilian, Department of the Army

Submitted in partial fulfillment of the
requirements for the degree of

MASTER OF SCIENCE IN CONTRACT MANAGEMENT

from the

**NAVAL POSTGRADUATE SCHOOL
June 2023**

Approved by: Kelley Poree
Advisor

Roderick Matthews
Co-Advisor

Michael R. Schilling
Academic Associate
Department of Defense Management

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ABSTRACT

In January 2021, a formal definition of procurement administrative lead time (PALT) was issued. This formal definition includes the beginning and end stages of PALT for various contract actions yet excludes a definition for the full acquisition lead time cycle. The formal definition also includes a proposed PALT tracking mechanism that would report PALT to the public. A review of the delta between the formal PALT definition and how PALT is measured at Army Contracting Command-Redstone Arsenal (ACC-RSA) is conducted. The proposed reporting mechanism is also reviewed for accuracy and viability to achieve the goal of governmental transparency into PALT. An in-depth assessment of a small subset of ACC-RSA data is conducted. The findings of this research indicate that the formal definition of PALT does not capture requisite actions performed by the contracting offices and may be reporting inaccurate information in the proposed tracking mechanism. Recommendations include a review of the formal PALT definition for the applicability of regulations at all levels to which it applies and a review of the proposed tracking mechanism to identify additional options. Finally, it is recommended that the full spectrum of the acquisition cycle, from identification of the requirement through award or delivery, also be investigated and defined to understand the proper placement of PALT within this cycle.

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TABLE OF CONTENTS

I.	INTRODUCTION.....	1
A.	BACKGROUND	1
B.	PROBLEM STATEMENT	6
C.	PURPOSE.....	6
D.	SCOPE AND LIMITATIONS.....	7
E.	ASSUMPTIONS.....	8
F.	RESEARCH QUESTIONS.....	9
G.	METHODOLOGY	9
H.	REPORT ORGANIZATION.....	10
I.	SUMMARY: CHAPTER I.....	10
II.	LITERATURE REVIEW	11
A.	BRIEF HISTORY OF ACQUISITION LEAD TIME	11
B.	DEFINING ARLT, PALT, AND ALT	12
C.	ARMY AND ACC-RSA DEFINITIONS.....	15
D.	THE PROPOSED TRACKING MECHANISM, FPDS-NG	17
E.	SUMMARY: CHAPTER II	18
III.	METHODOLOGY	19
A.	RATIONALE	19
B.	GOALS.....	20
C.	RESEARCH QUESTIONS.....	20
D.	SUMMARY: CHAPTER III.....	21
IV.	ANALYSIS	23
A.	INTERVIEW WITH OMB-OFPP	23
B.	SURVEY RESPONSES FROM REQUIRING ACTIVITIES	25
C.	THE GAP BETWEEN ARLT AND PALT AT ACC-RSA FOR BASE CONTRACTS.....	26
	1. DD Form 2579 Timelines.....	30
	2. Synopsis Timelines.....	32
	3. Solicitation Release Timelines.....	32
D.	PRE-PRICED TASK ORDERS AT ACC-RSA.....	35
E.	ACC-RSA PALT GOALS AND EXAMPLE TIMELINES.....	41
F.	REPORTING OF PALT IN FPDS-NG	57

G.	REPORTING OF PALT IN PCF	64
H.	REPORTING OF PALT IN PIEE	65
I.	SUMMARY: CHAPTER IV	66
V.	FINDINGS AND RECOMMENDATIONS	67
A.	PRIMARY RESEARCH	67
1.	Primary Research Question	67
2.	Primary Research Findings	67
3.	Primary Research Recommendations	69
B.	SECONDARY RESEARCH	70
1.	Secondary Research Question	70
2.	Secondary Research Findings	71
3.	Secondary Research Recommendations	72
VI.	CONCLUSION AND AREAS FOR FURTHER RESEARCH	73
	LIST OF REFERENCES	75
	INITIAL DISTRIBUTION LIST	77

LIST OF FIGURES

Figure 1.	Army Acquisition Lead Time. Source: ASA (ALT) (2021).....	16
Figure 2.	FPDS Public Search Website. Source: FPDS (2021).	17

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LIST OF TABLES

Table 1.	Contracting Processes from CRP Receipt to Solicitation Release. Adapted from ACC-RSA (2022).	27
Table 2.	Example of Contracting Efforts Not Accounted for in the PALT Definition. Adapted from Department of the Army (n.d.).	29
Table 3.	DD Form 2579 Process Timeline Anomalies. Adapted from Department of the Army (n.d.).	31
Table 4.	SRB Process Timeline. Adapted from Department of the Army (n.d.).	34
Table 5.	Solicitation Build and Review Timelines without SRB. Adapted from Department of the Army (n.d.).	35
Table 6.	Example of Pre-Priced Task/Delivery Order Timelines. Adapted from Department of the Army (n.d.).	38
Table 7.	Example of Contractor Signature Timelines. Adapted from Department of the Army (n.d.).	40
Table 8.	ACC-RSA PALT Goals. Source: ACC-RSA (2022).	42
Table 9.	ACC-RSA Required Actions for Sole-Sourced, FFP, Negotiated Actions. Source: ACC-RSA (2022).	44
Table 10.	Example of ACC-RSA Actual Award Timelines. Adapted from Department of the Army (n.d.).	45
Table 11.	Example Proposal Receipt Timelines. Adapted from Department of the Army (n.d.).	47
Table 12.	Example Evaluation Timelines. Adapted from Department of the Army (n.d.).	50
Table 13.	Example Negotiation Completion Timelines. Adapted from Department of the Army (n.d.).	53
Table 14.	Example Post Negotiation Timelines. Adapted from Department of the Army (n.d.).	55
Table 15.	Example DD Form 2579 Approval/Solicitation Issuance Gaps. Adapted from Department of the Army (n.d.).	58

Table 16.	Example Solicitation Release Date Gaps – Base Contracts. Adapted from Department of the Army (n.d.).....	60
Table 17.	Example Solicitation Release Date Gaps – Pre-Priced Orders. Adapted from Department of the Army (n.d.).	63

LIST OF ACRONYMS AND ABBREVIATIONS

ACC-RSA	Army Contracting Command-Redstone Arsenal
AFARS	Army Federal Acquisition Regulation Supplement
AL	Alabama
ALT	Acquisition Lead Time
ARLT	Acquisition Requirements Lead Time
ASA (ALT)	Assistant Secretary of the Army (Acquisition, Logistics, and Technology)
BAA	Broad Agency Announcement
CAR	Contract Action Report
CFR	Code of Federal Regulations
COCO	Chief of the Contracting Office
CPFF	Cost Plus Fixed Fee
CRB	Contract Review Board
CRP	Contract Requirements Package
DARS	Defense Acquisition Regulations System
DASA (P)	Deputy Assistant Secretary of the Army (Procurement)
DAU	Defense Acquisition University
DCMA	Defense Contract Management Agency
DFARS	Defense Federal Acquisition Regulation Supplement
DOD	Department of Defense
DPC	Defense Pricing and Contracting
FAR	Federal Acquisition Regulation
FFP	Firm Fixed-Price
FPDS-NG	Federal Procurement Data System-Next Generation
FR	Federal Register
FY	Fiscal Year

GAO	General Accounting Office/Government Accountability Office
IBTF	Integrated Bench Test Facility
IG-DOD	Inspector General, Department of Defense
IRB	Institutional Review Board
LCDR	Lieutenant Commander
N/A	Not Applicable
NDAA	National Defense Authorization Act
NPS	Naval Postgraduate School
OMB-OFFP	Office of Management and Budget, Office of Federal Procurement Policy
PALT	Procurement Administrative Lead Time
PCF	Paperless Contract Files
PCLT	Procurement Lead Time – Merritt Thesis
PIEE	Procurement Integrated Enterprise Environment
PLT	Procurement Lead Time – DAU
PNM	Post-Negotiation Memorandum
POC	Point of Contact
POM	Prenegotiation Objective Memorandum
PSC	Product Service Code
RFP	Request for Proposal
RPA	Requirements Package Assistant
SCO	Senior Contracting Official
SRB	Solicitation Review Board
TALT	Total Acquisition Lead Time
UCA	Undefinitized Contract Action

I. INTRODUCTION

A. BACKGROUND

For decades, the contracting lead times have been a focus of the United States Government and contractors to achieve government procurement efficiency. As far back as 1949, achieving economies and efficiencies in government procurements has been a topic of discussion at the Code of Federal Regulations (CFR) level (Coordinated Procurement, 1949). An example of how contract lead times are related to such economies and efficiencies is provided in a 2011 report by J. Ronald Fox, entitled *Defense Acquisition Reform, 1960-2009 An Elusive Goal*. As quoted by Fox from the January 6, 1969 publication of the *Armed Forces Journal*, the following example is related to the housing industry; however, it does set the stage for how the government may be looking at contract lead times:

Usually a large engineering team is amassed to demonstrate to the military buyers that the company has the capability in place to do the job. *If the contract award is delayed, as is often the case* [emphasis added], this high-cost team can stand virtually idle for months. In the absence of a rigorous determination to keep costs low, costs to the company and to the Government for these programs can be astronomical. (Fox, 2011, p. 8)

While Acquisition Requirements Lead Time (ARLT), Procurement Administrative Lead Time (PALT), or Acquisition Lead Time (ALT) are not specifically mentioned in previous literature, various references to lead times, economy, and efficiency are a common theme for areas of improvement within government procurements. Perhaps part of the reason for lack of reference to ARLT, PALT, or ALT is that there was no consistent or formal definition within the government. For the purposes of this paper, the following Army-level definitions are utilized. The ARLT refers to the time between identification of a requirement and submission of the requirement package to the contracting office. The PALT refers to the time it takes the contracting office from receipt of the requirements package to award of the contract, and ALT denotes the full timeline from identification of the requirement to award of the contract. This results in a simple formula of $ARLT + PALT = ALT$.

The National Defense Authorization Act (NDAA) for Fiscal Year (FY) 2018 sought to formalize a definition of PALT within the Department of Defense (DOD). On February 9, 2018, the Defense Acquisition Regulations System (DARS) published a definition of PALT in the Federal Register (FR), soliciting public comment (Regulations.gov, 2018). This notice mirrored the language in the NDAA, proposing PALT as “the time between the date on which the initial solicitation for a contract or task order of the Department of Defense is issued and the date of the award of the contract or task order” (p. 5762). In addition, the notice included a proposed method for tracking and reporting the PALT in the Federal Procurement Data System-Next Generation (FPDS-NG).

The DARS received six responses to the Opportunity for Public Comment of Proposed Definition of PALT, 2018 posting (Regulations.gov, 2018). Of the six responses, four disagreed with the proposed definition, one from private industry agreed, and the final respondent provided comments beyond the nature of the request. Collectively, the four dissenters disagreed on the PALT start date and provided different PALT start date scenarios. Of the four dissenters:

1. Respondent one provided a long list of reasons why the use of the solicitation release date does not cover internal contracting activities and related timelines before the release of the solicitation.
2. Respondent two recommended the use of the creation of the requirement at the requiring activity level.
3. Respondent three suggested that the PALT include the entire time from requirement development to contract award, and referred to the contracting process as Administrative Lead Time
4. Respondent four stated that the PALT begins upon approval of funding at the Comptroller's level.

Given the limited number of responses, and the vast array of other definitions for PALT and ALT, as well as the introduction of Administrative Lead Time versus Acquisition Lead Time, this initial post was followed by another, more detailed FR post nearly two years later. On January 21, 2020, the Office of Management and Budget, Office

of Federal Procurement Policy (OMB-OFPP), submitted another notice and request for public comment in the FR regarding a proposed formal definition of PALT (Procurement Administrative Lead Time [PALT], 2020). This announcement reiterated the initially proposed definition of PALT for contract actions requiring a solicitation and the tracking mechanism of FPDS-NG. It also enhanced the definition of PALT to include pre-priced task/delivery orders as the date the task/delivery order is issued starts and stops the PALT, unsolicited proposals, and other definitions for various levels of Broad Agency Announcements (BAA).

On January 14, 2021, the OMB-OFPP issued the formal definition for PALT (Wooten, 2021). This memorandum defined PALT as “the time between the date on which an initial solicitation for a contract or order is issued by a federal department or agency and the date of the award of the contract or order” (Wooten, 2021, p. 2). This definition also included the PALT for task/delivery orders, unsolicited proposals, and BAA, as previously mentioned. In addition, the memorandum stated that OMB-OFPP “received three comments in response to the Federal Register notice. All comments were generally supportive of the definition and approach to public reporting” (Wooten, 2021, p. 2). However, the comments are unavailable on the public website to review and verify this statement.

The formal definition provided by the OMB-OFPP also included the tracking mechanism, FPDS-NG, as the solicitation date and award date as the PALT tracker. In addition, this formal definition also came with caveats. Footnote 2 at the bottom of page 2 and the last paragraph of page 3 indicated that if agencies are tracking PALT at more extended levels than formally defined, they should continue to do so (Wooten, 2021, p. 2–3).

One insight into the importance of PALT at the DOD level comes from the 2020 FR post requesting comments to the proposed definition. Specifically, this FR post states,

Establishing a common definition of PALT and a plan for measuring and publicly reporting PALT data are important steps in helping the Federal Government to understand and better address causes of procurement delays. PALT can help to drive continual process improvement and the pursuit of more innovative procurement practices, especially when the data are used

in combination with other inputs for evaluating the overall effectiveness of the acquisition process in delivering value to the taxpayer, such as cost and the quality of the contractor's performance. PALT can also create incentives to drive greater efficiencies in the requirements development process, which has long been recognized as one of the most significant sources of delay in the acquisition lifecycle. (Procurement Administrative Lead Time [PALT], 2020, p. 3429)

Perceptions of ARLT, PALT, and ALT may differ at the individual activity level. For instance, the Army Contracting Command-Redstone Arsenal (ACC-RSA) utilizes PALT to track the progress of each acquisition by monitoring individual milestone steps throughout the acquisition process. These milestones establish timelines for when the end user can expect their requirement to be awarded, while also indicating where delays in the acquisition occur. In addition, the PALT can be used in reverse, such as indicating to the program office the minimum date the contract requirements package (CRP) must be completed to achieve contract award by a specified need date. While the use of PALT may appear to differ between the federal government and ACC-RSA, the goal of achieving timely contract awards remains the same.

The ACC-RSA also utilizes the FPDS-NG system for each contract action. The contract writing system automatically pushes many of the details contained in the contract action to the FPDS-NG Contract Action Report (CAR). Upon award of the action, the final CAR is retrieved and uploaded into the appropriate contract file. The same file retrieved by the contracting officer is available on the public website, as discussed further in Chapter II.

For purposes of this study, data collections will consist of actions awarded by ACC-RSA. The ACC-RSA is the largest of six major Army Contracting Centers for the Army, providing a wide range of products and services from garrison and contingency contracting to aviation and missile defense systems production and support. The following insight to the ACC-RSA structure was derived from the internal SharePoint website (ACC-RSA, n.d.):

- ACC-RSA Mission Statement: Agile and Able Contracting Professionals providing Capabilities to Customers: On Time...Anytime...Anywhere!

- Organization: The ACC-RSA consists of the following six Directorates:
 - Aviation and Missile Command – Maintenance, sustainment, and logistics of major weapons systems and garrison activities.
 - Aviation – Helicopters, fixed-winged aircraft, propulsion, and unmanned aerial systems production and services.
 - Missiles and Space Systems – Missiles and air defense production and services.
 - Mission Support – Post award closeout, pricing support, policy, and information technology support.
 - Modernization – Development of new combat capabilities and upgrades of existing systems.
 - Space, Missile Defense, and Special Programs – Secure environment contracting.
- ACC-RSA Personnel Roles and Responsibilities Summary: The ACC-RSA personnel provide a variety of contracting support for the warfighter. This support includes the procurement of research and development, major weapons systems, sub-systems, and services.

As discussed in detail in this chapter, there have been multiple studies and inferred definitions related to ARLT, PALT, and ALT, or various renditions thereof. Many of the earliest studies reviewed referred to lead times as applying to supplies and/or spares only (Merritt, 1987; Conahan, 1987; Gebicke, 1994). However, the focus of lead times has shifted to include all government procurement levels. Previous research and many concepts of ARLT, PALT, and ALT typically blame the government for such delays at various levels. What may be missing from previous research is that contractors themselves may be a part, if not a significant part, of such delays.

Given the lack of a definitional consensus on ARLT, PALT, and ALT, and for clarification within this paper, ARLT denotes the time from identification of the requirement to submission to the contracting office, PALT refers to the Procurement Administrative Lead Time, and ALT as the full Acquisition Lead Time. Any other references to the same or similar acronyms will be spelled out separately, with the use of the acronym GAO as the only exception. The General Accounting Office (GAO) was renamed the Government Accountability Office (GAO) in July 2004. For purposes of this paper, the acronym GAO will apply to both. In addition, a solicitation may also be referred to as a Request for Proposal (RFP) in various systems during the analysis.

B. PROBLEM STATEMENT

A formal definition of PALT has been implemented by the OMB-OFPP. However, this definition is very broad and allows federal organizations to continue to track PALT at their own internal definition. In addition, the full spectrum of the acquisition cycle, from identification of the requirement through award, has yet to be defined. There may also be regulations or local policies requiring contracting offices perform some functions before the release of a solicitation that cannot be performed by program offices.

Finally, the current FPDS-NG system only tracks two dates: the date the solicitation is issued, and the award date. These dates could potentially be misleading and leaves out an array of other contract actions such as task/delivery orders that do not require a solicitation but can often take long periods of time to award. The FPDS-NG system also does not capture important data points during the acquisition cycle that may assist in identifying causes for excessive lead times.

C. PURPOSE

The purpose of this research is to explore regulatory and ACC-RSA local policy requirements to determine if there are impacts to ARLT, PALT and/or ALT, should this formal definition of PALT become required across the government. Any noted contractor delays will also be reviewed. The research will also investigate the reliability of the data captured by the FPDS-NG for tracking PALT. All research data points, surveys, or interviews will specify the dates in the analysis.

D. SCOPE AND LIMITATIONS

The initial research focuses on how the PALT formal definition was determined. This will include an interview with the point of contact (POC) at the OMB-OFFP as listed in the 2020 FR notice. From there, surveys will be sent to various program offices located at Redstone Arsenal to get their perspective on the definition, and whether there is any effect on their planning processes for contract requirements. Through these interviews and surveys, the study will look at how this definition affects various levels of the procurement cycle.

The program office surveys mentioned will attempt to receive information from each program office within Redstone Arsenal that submits CRPs to the ACC-RSA and will include at least one question related to how, or if, ARLT is tracked. A survey approach was chosen to ensure the questions asked are consistent across the survey pool, and no deviation from the focus of the study occurs. The surveys will be strictly voluntary, and the number of respondents is unknown. While a standard questionnaire will be used, there lies the possibility of changes or expansion of the survey as input is received.

In the process of reviewing actual PALT as utilized at ACC-RSA, contract actions will be reviewed within the Army's Paperless Contract Files (PCF) system. The primary limitation with using this system is the number of contract actions, known as cabinets, this researcher will have access to. The authorization to view individual files is limited to primary and secondary contracting officers and contract specialists, and others, such as legal advisors and fellow team members, in which a cabinet manager grants access. In addition, some personnel are provided access to perform cabinet self-assessment reviews of other organizations within ACC-RSA.

With such known limited access to PCF contract files, the reviews will consist of examples of how long individual milestones within PALT can take, and a summary of what may cause significant delays. As such, these reviews will not be statistically significant of the approximately 10,000 to 15,000 contract actions awarded within ACC-RSA each year. However, the examples are intended to highlight timelines for the processes required, either

by regulation or internal policy, to be completed from receipt of a completed CRP to award of a contract.

All contract actions reviewed will consist of base awards and pre-priced task/delivery orders only. This is to address the formal PALT definition as discussed and potential causes of delays. The vast number of different types of modifications and other types of task/delivery orders that can be awarded are not a topic of this discussion. All attempts will be made to utilize the same base contracts and task/delivery orders throughout the analysis.

A review of the FPDS-NG system for tracking purposes will also be conducted. This tracking mechanism review will also be limited to contract actions awarded by ACC-RSA as mentioned. All attempts will be made to review the same contract actions throughout the analysis, whether via PCF or FPDS-NG. A review of current Army tracking mechanisms, such as the existing Procurement Integrated Enterprise Environment (PIEE) PALT tracker and Army's PCF milestones, will also be conducted for viability of possible replacements or supplements. All attempts will be made to meet the goals of the study; however, obtaining the appropriate access to contract files and related FPDS-NG reports is unknown at this time.

E. ASSUMPTIONS

This research will be based on the following assumptions:

1. The researcher has extensive contracting knowledge.
2. The researcher will be authorized sufficient access to various ACC-RSA systems to conduct the research as planned.
3. The researcher assumes the readers will have a basic knowledge of contracting.
4. All or most requests for interviews and surveys will result in positive responses.
5. The samples obtained from the ACC-RSA databases will be representative of, or can be useful to, further research by other contracting agencies.

F. RESEARCH QUESTIONS

The primary research question is if the formal definition of PALT aligns with the procurement actions required by regulation or policy to be performed by acquisition professionals to achieve award, from the ACC-RSA perspective. The secondary research question is whether the proposed FPDS-NG tracking mechanism provides accurate and/or sufficient data to indicate where delays in the procurement process occur.

The primary research will explore how PALT is used within the ACC-RSA, and the results will then be compared to the formal definition presented by the OMB-OFPP. Any deltas between the formal definition and how acquisition professionals at Redstone Arsenal utilize PALT will be investigated further to determine if the formal definition overlooks any processes, or if existing methods utilized by the ACC-RSA should be changed. Potential contractor effects on procurement lead times may also come to light during this research. Additionally, whether the full acquisition cycle has been formally defined, or used consistently across the government, will be researched. Given the formal definition PALT states that PALT for contracts begins at release of the solicitation, other processes in the acquisition cycle may not be included in this definition.

G. METHODOLOGY

The Naval Postgraduate School (NPS) Institutional Review Board (IRB) reviewed the OMB-OFPP interview and the program office survey questions and determined them to not involve human subject research. In addition, the ACC-RSA leadership reviewed the program office survey questions and authorized this researcher to contact the related program offices. Finally, attempts to review contract files related to the research will individually require authorization of the contracting officers of said contract files.

The data collection methods will consist of interviews with OMB-OFPP and program office surveys, as well as various contract files and FPDS-NG reviews. The contract file reviews will be based on contract type, and kind of action. The contract type may consist of firm fixed price (FFP) or cost reimbursement, or a mix of FFP and cost reimbursement. The kind of action will include base contracts and pre-priced task/delivery orders.

The FPDS-NG reviews will look at how the true PALT of these actions has, or has not, been captured. With only two dates currently reported in the FPDS-NG, the data will be evaluated for how actions that do not include solicitations, such as pre-priced task/delivery orders are being reported and the accuracy of this reporting. Additionally, the Army's PCF system milestones and the PIEE will be reviewed for possible implementation as tracking mechanisms.

H. REPORT ORGANIZATION

Chapter I identifies the background, problem statement, purpose, scope and limitations, assumptions, research questions, and the methodology of this project. Chapter II includes a literature review and historical information related to procurement lead times. This chapter also reviews the current Army and ACC-RSA policies as well as a review of the suggested tracking mechanism, FPDS-NG. Chapter III expands on the methodology of the research, goals, and research questions. The analysis of this research is in Chapter IV, with the findings and suggested areas of further research in Chapter V.

I. SUMMARY: CHAPTER I

This chapter provides an introduction and background to the topic of this research. The PALT is a major topic throughout the government, given the mandate to establish a formal definition and tracking mechanism. While the goal of the definition may be to measure the efficiency of the acquisition process, this research looks at whether the definition, and related tracking mechanism, provide the level of information sought. The research also reviews the importance of ARLT and ALT within the procurement cycle. In the next chapter, the background and source of the data utilized is described.

II. LITERATURE REVIEW

A. BRIEF HISTORY OF ACQUISITION LEAD TIME

As will be discussed in more detail, the ARLT, PALT, and ALT, have been tools used by requiring activities and contracting offices for many years for planning the overall procurement of everything, including spare parts, various services, and major weapons systems. A formal definition of PALT may assist government agencies and industry in their planning. Having a tracking mechanism available to the public may also assist, in that a contractor or government agency can see in real time how long a similar project or program may take. A formal definition of all steps throughout the acquisition process may assist as well. However, there have been few, if any, attempts to formally define ARLT or ALT across the government.

Concerns for efficiency in military procurements have likely been around since military procurements began. According to the Army Contracting Command Historian, Army contracting got its official start during the Revolutionary War (Weitzel, 2011). The first documented mention of economy and efficiency in government procurement was in the 1949 CFR (Coordinated Procurement, 1949). While acquisition lead times are not specifically addressed, it is an indication that concerns for more efficient procurements were prevalent. The emphasis in this regulation was related to joint and collaborative DOD procurements of supplies and services to achieve “economy and more efficient procurement” (Coordinated Procurement, 1949, p. 44).

During the 1950s through the mid-1970s, much of the acquisition focus was on research and development of major weapons systems (Fox, 2011). By the early 1980s, the government found itself paying large sums of money for buying and storing excess spare parts due, in part, to inadequate acquisition lead time estimates (Conahan, 1987, Gebicke, 1994). As a result, the DOD implemented the DOD Initiatives to Improve the Acquisition of Spare Parts (Conahan, 1987). This was followed by additional initiatives for the procurement of spares in 1990. These additional initiatives were largely focused on the acquisition lead time (Gebicke, 1994). While both initiatives, and resultant audits, were

strictly focused on the procurement of spare parts, the ultimate outcome was a spotlight on the acquisition lead time for all procurements across the DOD.

B. DEFINING ARLT, PALT, AND ALT

Until January 14, 2021, there was no formal definition of ARLT, PALT, or ALT. The Federal Acquisition Regulation (FAR) does not address acquisition lead times in Part 2.1 – Definitions (FAR 2.1). This may explain some of the comments received from the initial FR post in 2018. It appears there are many agency- and industry-level perceptions of what PALT, or even ARLT and ALT, really are.

The first step in the procurement process is defined by the Army as ARLT; the time from identification of the requirement through submission of a complete CRP. The research specific to ARLT is limited; however, references to delays in building and submitting contract requirements are quite numerous. In 2011, the GAO provided this insight into possible issues with the CRP process related to their review of the Departments of Health and Human Services and Homeland Security, the National Aeronautics and Space Administration, and the U.S. Agency for International Development:

Most agency components have established expected time frames for the last phase of acquisition planning—beginning when the program and contracting offices finalize a request for contract package. However, none of the agency components have measured and described in guidance the time needed for program offices to develop and obtain approvals of key acquisition planning documents—including statements of work, cost estimates, and written acquisition plans, if required—during the pre-solicitation phase, which serves as the foundation for the acquisition process. Agencies have also not measured the time needed during the procurement request phase to finalize these documents in collaboration with contracting offices. (Hutton, 2011, p. 26)

This was followed in 2016 by an Army Audit Agency audit of Army policies and procedures related to requiring activity roles and responsibilities. Within this quote, DFARS is the Defense Federal Acquisition Regulation Supplement, and AFARS refers to the Army Federal Acquisition Regulation Supplement. This audit concluded the following:

- Contracting policy and guidance has historically focused on contracting professionals and the contract instrument itself rather than all of the other

activities and personnel who are equally critical to the process leading up to and following contract award.

- Overarching contracting policies, such as the FAR, DFARS, and AFARS, are primarily used by members of the contracting community. They don't clearly articulate the responsibilities of requiring activity senior leaders and how they should be held accountable for managing their activity's responsibilities throughout the contracting process, including oversight of contractor performance.
- Army-specific contracting guidance doesn't provide a consistent or clear definition of whom or what constitutes a "requiring activity." Instead, numerous Army policies offer a variety of references to the term requiring activity, which are not clear and can't reliably be used to assign or establish senior leader accountability. (Nelson, 2016, p. 7-8).

A 2021 study by Baran et. al. attempted to make a quantitative measurement of ARLT utilizing the Army PCF system. The initial definition of ARLT in the study followed the Army definition of ARLT as the identification of the need to acceptance of a complete CRP by the contracting office. However, on page 37 of the study, the authors changed the definition of ARLT to "ARLT is the time that has elapsed from the customer's initial submission of its requirement packet to its approval from the local contracting agency" (Baran, et. al., 2021, p. 37). Due to this discrepancy in definitions and the possible impact to the data analysis, this study cannot be utilized in this research.

The earliest definition for PALT that could be found was in a Thesis by Navy Lieutenant Commander (LCDR) Brooks Merritt, Jr. in 1987. In his paper, LCDR Merritt defined PALT "as the time interval between the initiation of a procurement action and the award of a contract" (p. 11). It is further defined as being one part of two lead time elements, with production lead time being the second element. However, the definition also includes procurement lead time (PCLT) as the full process of the two lead time elements combined. In addition, this paper was also focused on the procurement of spares.

Alternatively, the Defense Acquisition University (DAU) Glossary, dated November 2009, defines Procurement Lead Time (PLT) as “The interval in months between the initiation of procurement action and receipt into the supply system of the production model (excluding prototypes) purchased as the result of such actions, and is composed of two elements: production lead time and administrative lead time” (Hagan, p. B-138). However, the referenced administrative lead time is not defined. Also, this is the first definition found so far that uses time intervals in months. In fact, even the formal OMB-OFPP definition does not specify what measurement of time should be used.

To see if DAU had implemented the formal OMB-OFPP definition, a search was conducted of the DAU website on October 9, 2021. The outcome of said search is the same definition of PLT, initially, but with various “Alternate” definitions. One such alternate definition is “Procurement Lead Time is composed of both PALT and Production Lead Time” (DAU, n.d.). The DAU further states, “Procurement Lead Time is a term sometimes used interchangeably with the terms Procurement Action Lead Time, Contract Action Lead Time, and Administrative Lead Time. Precise terminology varies among contracting officers and across agencies” (DAU, n.d.).

However, the DAU continues to define PALT as Procurement Action Lead Time, in lieu of Procurement Administrative Lead Time as defined by the OMB-OFPP. In this definition, DAU is including requiring activity efforts, such as developing the statement of work and technical documents. According to the DAU, the only difference between PALT (as they define it) and PLT is that PALT does not include production lead time.

The GAO defined ALT as a component of two actions; administrative lead time as the “time required to award a contract” and production lead time as “the time for the contractor to deliver an item” (Gebicke, 1994, p. 1). This report also refers to ALT as being “used in inventory management systems to determine the quantity of items needed to meet demand” (Gebicke, 1994, p. 1).

The previous report was followed by an Office of the Inspector General, Department of Defense (IG-DOD) report on November 23, 1998, which further defined ALT as “the time from the identification of an item reorder point to the receipt of the first

significant delivery” (p. 2). While this definition also included two lead time elements, administrative lead time and production lead time, it expanded the definition of administrative lead time to include the period from identification of the requirement. However, both definitions are specific to supplies at inventory control points, and neither appear to be an overarching definition for all supplies and services for ALT. In addition, neither report mentions ARLT or PALT.

In a report dated July 2021, the GAO introduced a new acronym to the mix, Total Acquisition Lead Time (TALT). According to the report, TALT is defined by the Air Force as “the time from the identification of a requirement to the delivery of a capability” (DiNapoli, 2021, p. 31). In addition, the DOD defines PLT as “The interval in time between the initiation of procurement action and receipt of the products or services purchased as the result of such actions” (Office of the Chairman of the Joint Chiefs of Staff, 2021). On the surface, these definitions appear to be similar to the definition ACC-RSA, and other organizations, use for ALT; however, an Army definition of the time span from award of the contract to receipt of the product or service could not be located. This brings to light that ALT, TALT, and/or PLT have never been defined at the level PALT currently is.

The DOD and other government agencies are now required to define PALT as provided by the NDAA of FY 2018 and mirrored in the final OMB-OFPP definition as previously described. While this definition of PALT, starting at issuance of the solicitation and ending at contract award, is not common across the agencies or even individual offices, it may be a steppingstone to a more detailed definition. It may also be a springboard for a consolidated definition for ALT.

C. ARMY AND ACC-RSA DEFINITIONS

The Assistant Secretary of the Army (Acquisition, Logistics, and Technology), also referred to as ASA (ALT), provides on their non-public website two elements for ALT. As shown in Figure 1, the ARLT refers to actions to be conducted by the requiring activity prior to submission of the complete CRPs to the contracting office, PALT as the contracting office activities, and ALT as the full process from identification of the need to award of the contract.

Acquisition Lead Time

Acquisition Lead Time (ALT) = Acquisition Requirements Lead Time (ARLT) +
Procurement Administrative Lead Time (PALT)



Figure 1. Army Acquisition Lead Time. Source: ASA (ALT) (2021).

In a memo to the Army Heads of the Contracting Activity, dated March 12, 2021, the Deputy Assistant Secretary of the Army (Procurement), (DASA [P]), provided the following definitions for ALT and PALT:

ALT: Days from requiring activity identification of need to award.

PALT: Days from acceptance of procurement requirement package to award.

As a part of the Army contracting team, the ACC-RSA follows these same definitions. It is noted that these definitions also specifically state that PALT and ALT are to be recorded by the number of days. This level of tracking PALT is not included in the formal definition.

D. THE PROPOSED TRACKING MECHANISM, FPDS-NG

The OMB-OFPP memorandum directed the FPDS-NG as the official vehicle for tracking PALT across the government. The FPDS-NG system automatically generates a report called a CAR from the various contract writing systems. The FPDS-NG website allows for public searches of completed contract actions, to include modifications and task/delivery orders. The search function is user-friendly, and searches can be narrowed by a variety of options. Figure 2 is a snapshot of the FPDS-NG home page depicting the search function.



Figure 2. FPDS Public Search Website. Source: FPDS (2021).

The type of information that can be retrieved by the public on this website includes contract action dollar value, contractor, funding agency, a summary of what the action is for, and congressional district where the work will be completed. The report is generally three pages in length, and what is viewable on the website is identical to the report the contracting officer sees when awarding a contract action. To see this level of information, a single click on the “(View)” link next to the Award ID number, typically the contract number, is all that is required.

The dates reported in the CAR include the date the contract action was signed, the period of performance start date, the completion date, and the solicitation date. However, the solicitation dates for modifications or task/delivery orders could be misleading, as solicitations are not required for most modifications and pre-priced task/delivery orders.

As will be discussed further in Chapter IV, the singular use of solicitation date as the start of PALT within the FPDS-NG system could result in inaccurate reporting.

E. SUMMARY: CHAPTER II

Chapter II provides a history of acquisition lead time, and various definitions of ALT, PALT, and other terminologies related to acquisition lead time. In addition, a synopsis of the FPDS-NG system is provided. It is obvious there is no consistency across the government as to how ALT or PALT are, or should be, defined. There also may be issues with the suggested reporting mechanism as it is currently reporting. In Chapter III, a more detailed review of the methodology of this research is provided.

III. METHODOLOGY

A. RATIONALE

As discussed, the data collection methods will consist of an interview with the OMB-OFPP and a program office survey, as approved by the NPS IRB. The interviews and surveys will be necessary to retrieve information from the sources most affected. The OMB-OFPP will be contacted to ask how the current definition was determined. In addition, other considerations, such as a potential gap between receipt of a final requirement and issuance of a final solicitation will be asked.

Various program offices will also be contacted to gauge how this new formal definition may or may not affect their acquisition planning processes. This survey will also inquire as to whether there is a formal tracking mechanism for measuring ARLT at the program office level. As the formal definition of PALT begins with issuance of a solicitation, and there is no formal definition of ARLT, how internal Contracting functions being attributable to the program offices is a concern of this study.

The contract file reviews will consider a variety of contract types and dollar values from different ACC-RSA offices. For this study, only base contracts and pre-priced task/delivery orders will be analyzed and no dollar threshold will be established. This data population is directly related to the OMB-OFPP formal definition of PALT and is inclusive of actions accessible to this researcher in the PCF system at the ACC-RSA level. Modifications will be eliminated from the study due to the vast types of modifications that can be issued, from simple administrative modifications to complex definitization of letter contracts. Task/delivery orders outside of pre-priced actions are likewise eliminated, also due to the multiple types of orders that could potentially be put on contract.

The contract file reviews will focus on specific dates and notes within the PCF milestones and may require a review of the contract file itself for further clarification. Specific timelines within the PALT, as defined by ACC-RSA, will be collected in spreadsheet format. Any timelines identified within the PCF system prior to release of a solicitation will also be reviewed. For further analysis, dollar values of the actions will also

be collected to see if contract award amounts have an impact on the PALT timelines. However, the dollar values will be rounded, and the full contract number will not be presented, to provide some anonymity to current or former Contracting personnel.

The spreadsheet format was chosen due to the ease of doing various sorts and calculations. The number of days for various steps within the PALT will be presented, inclusive of contracting actions prior to release of the solicitation not included in the formal PALT definition. Areas of significant delays during the PALT timeline, such as contractor late proposals and lengthy negotiations, will also be provided.

The FPDS-NG reviews will look at how the true PALT of actions has, or has not, been captured. The FPDS-NG data will also be evaluated for how actions that do not require solicitations are being reported and whether such actions should be reported. As mentioned, all government contract actions are available in the FPDS-NG system. For this study, the same actions in the contract file analysis will be reviewed, also in a spreadsheet format. This analysis will compare the solicitation dates reported in PCF versus the solicitation dates reported in FPDS-NG. Additionally, the Army's PCF milestones, as well as the PIEE, will be reviewed for possible implementation or supplementation as tracking mechanisms.

B. GOALS

The goal of this research is to report sufficient information for further research in other agencies to assist the OMB-OFPP to make informed decisions regarding PALT and public reporting mechanisms. This researcher acknowledges that the scope of this paper is limited to processes in place at ACC-RSA and Army contract tracking vehicles; however, other agencies or offices may be able to build on this research to reach a government-level definition and tracking ability acceptable by all parties involved.

C. RESEARCH QUESTIONS

To analyze how PALT affects the acquisition community, an understanding of the full acquisition cycle is necessary to determine where PALT lies within the cycle. In addition, utilizing a tracking mechanism that can capture how or why breakdowns in the

acquisition process, resulting in delayed contract awards, will assist in determining what actions may be required to deter such delays. The primary research questions for this study are as follows.

1. What does the full acquisition cycle consist of and where does PALT fit in it at the Army level?
2. What is the effect of the formal definition on acquisition professionals at ACC-RSA?
3. Does the FPDS-NG report accurate, usable data?
4. If actions reported in FPDS-NG indicate excessive lead times, is there any way to determine the cause of such delays?

Depending on the government agency, PALT can start at various times. Alternate start and stop dates are allowed to continue by the individual agencies, and even encouraged, by the OMB-OFPP. Therefore, this research will investigate the relationship of ARLT and PALT at the ACC-RSA level of procurement.

The FPDS-NG, PIEE, and Army PCF systems will be evaluated as potential tracking mechanisms. The current FPDS-NG system is limited to tracking only those contract actions that require issuance of a solicitation or is dependent on whatever dates are entered into it for actions that do not require a solicitation. Finally, this research will look at various reasons of delay behind ARLT and PALT timelines for similar acquisitions, and how that data may be captured by existing systems outside of FPDS-NG.

D. SUMMARY: CHAPTER III

Chapter III provides the rationale behind the research methodology, the goal of the research, as well as the primary research questions. It is noted that as the research is conducted and new information comes to light, additional research questions may be warranted. In Chapter IV, an analysis is conducted at the ACC-RSA level of ARLT, PALT, and ALT. The analysis also looks at currently available tracking mechanisms and how ARLT, PALT and/or ALT are being recorded.

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IV. ANALYSIS

A. INTERVIEW WITH OMB-OFPP

The POC listed in the FR 2020 announcement, Ms. Curtina Smith, was contacted via email on August 19, 2020, resulting in an interview scheduled for August 25, 2020. Ms. Smith was very pleasant and eager to assist in this researcher's Thesis endeavors. The following is based on the researcher's notes from this interview.

When asked where the PALT definition was determined, and by whom, Ms. Smith responded that the definition was derived from the FY18 NDAA and adopted by the DOD. It was further stated that the OMB-OFPP had a limited amount of time to make a final definition determination, and the responses to the 2018 FR post presented the least controversial definition. By controversial, Ms. Smith was referring to most of the DOD elements were, at a minimum, using this timeline. While most elements use the receipt of CRPs as the starting point, not all did. Overall, the use of the release of the solicitation date for the start of PALT would be least disruptive across the DOD. The issuance of the initial solicitation date was also relatively easy to capture via the FPDS-NG.

Referring to the use of the solicitation date as the official start of PALT, it was asked if the gap between receipt of a complete CRP and issuance of the solicitation had been considered. This researcher also stated that a gap of weeks or even months could occur between receipt of a complete CRP and issuance of the solicitation. Ms. Smith responded that they were aware of the gap and the OMB-OFPP intends to investigate it further once a common data collection source is identified and that the focus was strictly on PALT at the time the formal definition was issued.

The next topic of discussion was the definition of PALT for pre-priced task/delivery orders beginning at the award of the task/delivery order. Based on this definition, the PALT for these efforts would always be zero days. The response from Ms. Smith was that is the intent of the definition. The OMB-OFPP views pre-priced task/delivery orders as relatively simple, and that the program office could issue them. This researcher stated that warrants to obligate the government are not typically issued at the program office level. In addition,

the researcher also mentioned that the contractor can often take weeks to review a task order, only to come back and request changes, and then take days to review that correction, and recommend additional changes. Ms. Smith was not aware of some of the delays caused by contractors, which resulted in a side conversation about the effects contractors have on PALT. This information will be discussed further in the ACC-RSA PALT Goals and Realistic Timelines section.

When asked if there was any consideration of a separate PALT for special actions, such as Foreign Military Sales (FMS), Ms. Smith stated that separate PALT timelines were not considered for the current PALT definition. However, she further stated that the OMB-OFPP was working with the General Services Administration (GSA) on other unique procurements that may need their own PALT. Ms. Smith added that FMS actions would be included in such discussions with the GSA.

The next question was regarding the missing public comments to the 2020 FR post. While the official definition for PALT states that three comments were received and “generally supportive of the definition and approach to public reporting” (Wooten, 2021, p. 2), such comments were not publicly posted. According to Ms. Smith, the OFPP does not administer the FR website, but does have reach back to OMB for specific data. However, as these comments were not publicly posted, she did not have authorization to release them.

The final question asked was for the personal opinion of Ms. Smith as to where she thought the formal definition of PALT will go. Her response indicates future revisions to the current definition will likely be forthcoming. One goal is to have a single POC at each agency for PALT, to assist with the overall management and data collection. Eventually, they would like to have a single definition for all agencies that works for everyone, and they are working on a way to capture pre-solicitation time, but all DOD elements must have buy-in. In addition, they are working with GSA on areas of data that may need special consideration, which may include FMS.

B. SURVEY RESPONSES FROM REQUIRING ACTIVITIES

A standard survey was submitted to all known requiring activities located on Redstone Arsenal, AL. The survey pool consisted of project office personnel, to include Deputy Project Managers, Project Managers, Senior Enlisted Advisors, and Garrison Commander. This survey pool was selected based on limited knowledge of this researcher as to what levels within various commands ARLT, PALT, and/or ALT are tracked at the requiring activity level. The responses from this survey may also capture an unintended revelation as to whom within the requiring activities the subject of PALT is important.

This researcher was careful to not include any personal prejudice while submitting the survey. The survey was submitted via email, and included two attachments, the OMB-OFPP formal definition of PALT, and the survey. The emails included a brief introduction of the researcher, a brief introduction of the study, and a request for honest opinions related to the subject.

Of the ten surveys sent out across the various program offices, only two responses were received. However, the two responses were consistent. Both agreed that utilizing the solicitation release date as the start of PALT would be good from the contracting office perspective, not so much at the program office level. Both responses also agreed that they utilize whatever PALT tracking is passed down to them via the contracting office and do not track either PALT or ARLT separately.

With only two responses received to the initial request, this researcher resubmitted the survey to various administrative and operations personnel. This resubmission requested assistance in contacting the appropriate persons that may be interested in providing a response to the survey. To date, no responses have been received. As such, no full analysis of the program office perception of the new PALT definition, and its effect on these offices, could be conducted. Some theories exist, such as the option from the OMB-OFPP to utilize more stringent PALT start dates, yet many questions remain as to how the requiring activities track their ARLT outside of how the contracting offices track PALT. This may be an option for additional research.

C. THE GAP BETWEEN ARLT AND PALT AT ACC-RSA FOR BASE CONTRACTS

The ACC-RSA follows the same ARLT, PALT, and ALT definitions as provided in Figure 1. While the formal definition of PALT begins at issuance of the solicitation, the ASA (ALT) and DASA (P) definitions provided require the submission of the completed CRP to begin PALT. The timeline between receipt of a complete CRP and issuance of a solicitation is undefined at the OMB-OFPP level.

Table 1 breaks down the processes between acceptance of a completed CRP and the release of a final solicitation as recognized by ACC-RSA. It is important to note that the program offices have no control over the listed actions being performed by the contracting office. It is equally important to note the following processes, performed by the contracting officer, are not included in the formal definition of PALT.

Table 1. Contracting Processes from CRP Receipt to Solicitation Release.
Adapted from ACC-RSA (2022).

ACC-RSA Steps for Solicitation Release	Threshold
CRP Complete and Accepted – Starts PALT	
DD2579 Approved (DFARS 219.201, AFARS 5119.201)	Actions > \$10,000
Synopsis (FAR 5.101, if required)	Actions >\$25,000
Other Processes Prior to Issuance of Solicitation	
Prepare Solicitation	
Team Lead and/or Contracting Officer Reviews	
Legal Review (ACC-RSA policy)	Actions \$550,000 and above
Branch Chief Review (ACC-RSA policy)	Actions <\$25 million
Chief of the Contracting Office (COCO) Review (AFARS 5115.406-1, 5101.170, and ACC-RSA policy)	Actions \$25 million to <\$250 million
Senior Contracting Official (SCO) Peer Review /Solicitation Review Board (SRB) (AFARS 5115.406-1, 5101.170 and ACC-RSA policy)	Actions \$250 million and above
Defense Pricing and Contracting (DPC) Peer Review (DFARS 201.170, AFARS 5101.170, and ACC-RSA policy)	Actions \$1 billion and above

The processes described are not all-inclusive of the documentation required to be completed prior to release of a solicitation. These are steps federally or local policy mandated to complete as shown in Table 1. These steps also cannot be performed by the program offices.

The ACC-RSA issued 12,886 actions with obligations over \$22 billion in FY 2020. Previous and subsequent years are in the same range. As will be discussed further, utilizing some of the milestone input from the Army PCF system may be unreliable or unavailable.

As such, this researcher utilized contract files to which individual documents were accessible to validate the information presented.

Table 2 represents the 30 contract and solicitation actions individually reviewed by the researcher. The contract file reviews originate from various contracting offices. The dollar values are based on the estimated dollar value reported on the approved DD Form 2579, as will be explained further, for consistency in the pre-award reporting of these processes. This information is dependent on the documentation presented in the Army PCF system and this researcher's review of the contract files.

The purpose of this table is to provide some insight as to how long the contracting office actions could potentially take prior to issuance of a solicitation and is not intended to be statistically representative of all contract actions. As presented in Table 1, there are several actions required to be performed by the contract offices. The following tables are a small subset of how long such actions can take to meet the regulatory or internal policy requirements by contracting offices vice the program office. The estimated dollar values are rounded to the nearest billion (B), million (M), or thousand (K).

Table 2. Example of Contracting Efforts Not Accounted for in the PALT Definition. Adapted from Department of the Army (n.d.).

Estimated Dollar Value	Solicitation or Contract Number	DD Form 2579 Submitted	DD Form 2579 Approved	Synopsis Posted, if Applicable	SRB Begin	SRB Complete	Solicitation Issued	Time from DD Form 2579 to Solicitation
\$143M	21-R-0131	10/7/2019	10/10/2019	3/26/2021	5/7/2021	5/19/2021	5/19/2021	590
\$8M	21-C-0050	10/24/2019	10/25/2019	N/A	N/A	N/A	5/18/2021	572
\$70M	16-D-0055	7/9/2014	7/10/2014	N/A	1/12/2015	9/30/2015	10/13/2015	461
\$328M	21-C-0039	2/20/2019	4/23/2019	5/2/2019	6/14/2019	7/29/2019	7/30/2019	160
\$85M	16-D-0050	6/19/2013	7/25/2013	8/19/2013	10/24/2013	11/11/2013	11/7/2013	141
\$28M	21-C-0021	8/1/2019	8/1/2019	8/7/2019	N/A	N/A	12/12/2019	133
\$42M	19-C-0013	8/1/2016	8/2/2016	N/A	N/A	N/A	12/7/2016	128
\$6B	17-C-0009	1/14/2014	1/21/2014	1/14/2014	1/22/2014	4/24/2014	4/25/2014	101
\$6M	17-C-0034	8/8/2016	8/12/2016	10/20/2016	N/A	N/A	11/9/2016	93
\$3M	15-C-0001	12/11/2013	12/11/2013	N/A	N/A	N/A	2/27/2014	78
\$3M	19-R-0391	8/19/2019	9/18/2019	9/19/2019	N/A	N/A	10/17/2019	59
\$78M	21-R-0181	8/30/2021	8/30/2021	N/A	10/1/2021	10/26/2021	10/27/2021	58
\$47M	21-R-0145	5/6/2021	Not Available	N/A	N/A	N/A	7/1/2021	56
\$2M	15-C-0063	7/9/2014	7/9/2014	7/10/2014	N/A	N/A	9/3/2014	56
\$2M	22-R-0047	10/6/2021	10/6/2021	N/A	N/A	N/A	11/29/2021	54
\$91M	19-D-0079	8/23/2017	8/23/2017	N/A	9/22/2017	10/5/2017	10/6/2017	44
\$13M	17-D-0033	6/15/2016	6/20/2016	7/8/2016	N/A	N/A	7/26/2016	41
\$361K	20-D-0028	5/30/2019	6/3/2019	6/3/2019	N/A	N/A	7/3/2019	34
\$182M	18-C-0017	7/17/2017	7/17/2017	N/A	N/A	N/A	8/17/2017	31
\$43M	18-D-0058	8/2/2017	8/3/2017	8/8/2017	N/A	N/A	8/29/2017	27
\$4M	17-C-0054	7/29/2014	7/30/2014	8/7/2014	N/A	N/A	8/25/2014	27
\$1M	16-C-0003	9/18/2014	9/22/2014	N/A	N/A	N/A	10/14/2014	26
\$1M	19-C-0021	6/8/2018	6/11/2018	6/8/2018	N/A	N/A	7/2/2018	24
\$41M	21-C-0029	5/21/2020	5/22/2020	5/28/2020	N/A	N/A	6/12/2020	22
\$16M	19-D-0013	4/11/2018	4/12/2018	N/A	N/A	N/A	5/2/2018	21
\$26M	20-D-0056	7/19/2018	7/24/2018	N/A	N/A	N/A	8/8/2018	20
\$15M	21-C-0065	7/1/2021	7/1/2021	7/6/2021	N/A	N/A	7/20/2021	19
\$5M	21-C-0010	6/30/2020	7/7/2020	N/A	N/A	N/A	7/17/2020	17
\$638K	20-C-0026	6/11/2018	6/18/2018	N/A	N/A	N/A	6/25/2018	14
\$93M	20-C-0032	5/20/2020	5/21/2020	N/A	N/A	N/A	6/3/2020	14

The data in Tables 2 through 5 is limited to the data available to this researcher in which access via the Army PCF system was achieved. For simplicity, this information is related to actions above \$10,000 and is not inclusive of all types of contract actions, such as Other Transaction Authority, modifications, and sealed bid actions. The contracts reviewed consist of base contract awards that were competitive or sole source and are a

mix of service and hardware procurements. This research utilizes a \$10,000 threshold as a beginning point due to DFARS requirements to formally submit a Small Business Coordination Record, DOD document DD Form 2579, for all actions over \$10,000. This DD Form 2579 is typically submitted immediately after receipt of the completed CRP, and dates of submission and approval are easily obtained within the PCF system. The “Not Available” for DD Form 2579 Approval on action 21-R-0145 is due to the DD Form 2579 provided in PCF is signed only by the contracting officer and not formally approved by the Office of Small Business Programs.

1. DD Form 2579 Timelines

At ACC-RSA, once a completed CRP is received, a DD Form 2579 is required to be submitted to the Office of Small Business Programs for all actions above \$10,000 per the DFARS and AFARS mentioned in Table 1. This DD Form 2579 review is inclusive of the entire requirements package and may take a day or longer, depending on the complexity of the requirement, weekends, holidays, and the reviewer's workload.

For consistency, the researcher reviewed the individual DD Form 2579s from Table 2 and utilized the contracting officer's signature date as the date of submission, and the Small Business Procurement Center Concurrence date for all DD Form 2579 approval dates. A majority (57%) of the 30 DD Form 2579s reviewed were processed the same day or the day following submission for approval. Table 3 represents the timeline of the sample anomalies. The estimated dollar values are rounded to the nearest billion (B), million (M), or thousand (K).

Table 3. DD Form 2579 Process Timeline Anomalies. Adapted from Department of the Army (n.d.).

Estimated Dollar Value	Solicitation or Contract Number	DD Form 2579 Submitted	DD Form 2579 Approved	DD Form 2579 Approval Timeline
\$328M	21-C-0039	2/20/2019	4/23/2019	62
\$85M	16-D-0050	6/19/2013	7/25/2013	36
\$3M	19-R-0391	8/19/2019	9/18/2019	30
\$6B	17-C-0009	1/14/2014	1/21/2014	7
\$5M	21-C-0010	6/30/2020	7/7/2020	7
\$638K	20-C-0026	6/11/2018	6/18/2018	7
\$13M	17-D-0033	6/15/2016	6/20/2016	5
\$26M	20-D-0056	7/19/2018	7/24/2018	5
\$6M	17-C-0034	8/8/2016	8/12/2016	4
\$361K	20-D-0028	5/30/2019	6/3/2019	4
\$1M	16-C-0003	9/18/2014	9/22/2014	4
\$143M	22-R-0131	10/7/2019	10/10/2019	3
\$1M	19-C-0021	6/8/2018	6/11/2018	3

A review of the DD Form 2579 delays at 30 or more days was conducted.

- For action 21-C-0039, a Memorandum for Record (MFR) was submitted referencing an approved Justification and Approval (J&A) for a sole source action. This MFR indicates that additional effort was placed on the initial award of the contract. This action would change the status of the completed CRP; thereby, delaying the approval of the DD Form 2579.
- Contract action 16-D-0050 delays appears to be the result of requirements changes during CRP submission. For instance, the original Independent Government Estimate is dated June 14, 2012 at the \$85M reported on the

DD Form 2579. The revised estimate was signed on February 18, 2016, and significantly reduced the action value to \$14M.

- The action 19-R-0391 also appears to have incomplete CRP issues. According to the notes in the PCF milestones, the J&A for a sole source award was pending approval during the same timeframe as the DD Form 2579 processing. The J&A is considered at ACC-RSA as part of a complete CRP.

While the analysis is a very small subset of all actions performed at ACC-RSA, it does bring to light those actions performed by the contracting office after a CRP is initially considered received, do take time. On occasion, such time can be significant.

2. Synopsis Timelines

After approval of the DD Form 2579, a synopsis of proposed actions exceeding \$25,000 is required to be posted to the general public per FAR 5.101. This requirement applies regardless of whether the action is a new contract, modification, or basic ordering agreement, unless an exception applies. In accordance with FAR 5.202, there are 15 such exceptions, such as unusual and compelling urgency, being commercial sole source, combination synopsis/solicitation, FMS source directed, or otherwise approved sole source actions. Both FAR 5.203 and 41 United States Code (USC) §1708(e)(A) state that the solicitation cannot be released prior to 15 days after the synopsis was issued. As this is a standard practice for federal procurements, no specific data was retrieved related to this requirement. It is assumed to be generally known that this 15-day delay is required prior to release of a solicitation.

3. Solicitation Release Timelines

Once the synopsis is posted, the contracting office can begin building the solicitation. Depending on the complexity of the solicitation, this could take one day or several weeks. Once built, the solicitation must go through various levels of review, depending on the estimated dollar value as presented in Table 1. At ACC-RSA, all solicitations under \$25 million require contracting officer, Team Lead, Branch Chief, and

Legal Advisor reviews. Actions estimated to be \$25 million to less than \$250 million include internal reviews, as well as a review and approval process at the COCO level.

For actions at \$50 million and less than \$1 billion, all reviews through the COCO level must be achieved before entering the SRB process. At ACC-RSA, the SRB includes additional reviews by the Compliance Review Liaisons, consisting of two procurement analysts, a price analyst, and a property specialist. Consecutively, a virtual review is conducted by the legal office, program office, Office of Small Business Programs, and, if non-competitive, the Advocate for Competition. The SRB also includes development of additional documentation, such as a presentation memorandum, presentation slides, a SRB toolkit, and a SRB Decision Document. For actions at \$1 billion and above yet another level of reviews is required at the DPC level.

Once these reviews are completed, any comments must be duly addressed, inclusive of potential changes to the solicitation and/or other contract file documentation. Such changes must go through many of the previous reviews again prior to receiving authorization to release the solicitation. Of the 30 contract and solicitation actions reviewed, the following seven processed through the SRB. Most of the actions reviewed are under the \$50 million threshold for requiring an SRB. Two additional actions over \$50 million were exempt due to being undefinitized contract actions (UCAs). Table 4 is not intended to indicate statistical significance of the actions performed at ACC-RSA, but to show how long the regulatory and/or local policies require. The estimated dollar values are rounded to the nearest billion (B) or million (M).

Table 4. SRB Process Timeline. Adapted from Department of the Army (n.d.).

Estimated Dollar Value	Solicitation or Contract Number	SRB Begin	SRB Complete	SRB Process Timeline
\$70M	16-D-0055	1/12/2015	9/30/2015	261
\$6B	17-C-0009	1/22/2014	4/24/2014	92
\$328M	21-C-0039	6/14/2019	7/29/2019	45
\$78M	21-R-0181	10/1/2021	10/26/2021	25
\$85M	16-D-0050	10/24/2013	11/11/2013	18
\$91M	19-D-0079	9/22/2017	10/5/2017	13
\$143M	21-R-0131	5/7/2021	5/19/2021	12

Of the 30 contract and solicitation actions reviewed, 11 actions required a synopsis to be posted but were under the threshold for SRB review and approval process. As shown in Table 5, the process of building the solicitation and obtaining all requisite reviews can be accomplished within the synopsis posting timeline. However, most of the actions take longer than the 15-day synopsis posting limitation even though the SRB processes were not required. The estimated dollar values are rounded to the nearest million (M) or thousand (K).

Table 5. Solicitation Build and Review Timelines without SRB. Adapted from Department of the Army (n.d.).

Estimated Dollar Value	Solicitation or Contract Number	Synopsis Posted	Solicitation Issued	Time from Synopsis Posting to Solicitation
\$28M	21-C-0021	8/7/2019	12/12/2019	127
\$2M	15-C-0063	7/10/2014	9/3/2014	55
\$361K	20-D-0028	6/3/2019	7/3/2019	30
\$3M	19-R-0391	9/19/2019	10/17/2019	28
\$1M	19-C-0021	6/8/2018	7/2/2018	24
\$43M	18-D-0058	8/8/2017	8/29/2017	21
\$6M	17-C-0034	10/20/2016	11/9/2016	20
\$13M	17-D-0033	7/8/2016	7/26/2016	18
\$4M	17-C-0054	8/7/2014	8/25/2014	18
\$41M	21-C-0029	5/28/2020	6/12/2020	15
\$15M	21-C-0065	7/6/2021	7/20/2021	14

D. PRE-PRICED TASK ORDERS AT ACC-RSA

In the case of pre-priced task/delivery orders, the formal definition utilizes the award date of the order as the beginning of PALT. As such, the PALT for these actions will always be zero days. This may be the case for unilateral orders issued by program offices that have warranted ordering officers. However, this PALT would not be applicable for all pre-priced task/delivery orders.

In accordance with AFARS 5101.602-2-92, the appointment of ordering officers is limited to the following:

1. Imprest funds (FAR 13.305)
2. Purchases utilizing Standard Form 44 (FAR 13.306 and DFARS 213.306)
3. Purchases under an IDIQ contract for movement of personal property (FAR 47.2)
4. Orders for certain services for personal property under \$10,000
5. Orders under IDIQ contracts awarded by a contracting officer, when the contract permits the appointment of an ordering officer and sets monetary limits within the contract.

Most of the ordering officer appointment possibilities include significant dollar value confines or are limited to the type of procurement. The final option, in which the contracting officer allows for an ordering officer to be appointed within the contract, is also limited to the terms and monetary value allowed within the contract.

In addition, pre-priced task/delivery orders may be issued either unilaterally or bilaterally, depending on the requirements of the base contract. As previously mentioned, not all orders are issued by ordering officers if the contract does not allow for ordering officers to be appointed, or the dollar value exceeds the above limitations. For orders issued by the contracting office, the task/delivery order is built by the contract specialist, then reviewed by the program office and contracting officer. In addition, many task/delivery orders are issued bilaterally, thereby requiring the contractor to review and sign the order prior to award.

While the number of task/delivery orders available for analysis is numerous, this researcher focused on actions that were unfamiliar. No dollar-value limitations were set in this analysis. The only limitations were that the task/delivery order was issued as a FFP pre-priced task order. In addition, this analysis is not intended to be statistically significant to all actions awarded at ACC-RSA, but to provide indication of PALT timelines and reasons for potential delays for award beyond zero days of pre-priced task/delivery orders.

It is of note that several of the task/delivery orders reviewed were miscoded within the Army PCF system. This researcher reviewed each awarded task/delivery order included

in this analysis to ensure that all were indeed pre-priced, regardless of how the PCF cabinet was coded. In addition, only one action reviewed by this researcher may have been issued unilaterally. This action, 21-F-0134, had a PALT of four days. This researcher was not able to locate any task/delivery orders issued by ordering officers. In addition, no zero-PALT orders were located. While these types of actions may exist within the DOD, they appear to be the anomaly at ACC-RSA.

As shown in Table 6, the PALT for task/delivery orders varies greatly, regardless of dollar value. As a DD Form 2579 is not required for pre-priced task/delivery orders, the CRP acceptance date as entered into the PCF milestones was utilized. To provide accuracy for the CRP acceptance date, each contract file and the PCF milestone notes were reviewed. Some of the deltas between the reported CRP acceptance date and the final CRP documents being received include incorrect dates entered into the PCF milestones, changes to the requirement such as adding or removing quantities, and discussions with the contractor during integrated product team meetings initiating changes to the requirement. In addition, most IDIQ base contracts require a task/delivery order be issued simultaneously with the contract for the minimum amount or quantity stated in the contract. For these task/delivery orders, the receipt of the completed CRP is not the significant influence for issuing the order; award of the base contract is the determining factor.

In addition, all task/delivery orders in Table 6 were individually reviewed to identify if they were issued bilaterally or unilaterally. As indicated in the table, all orders reviewed were issued bilaterally. The reference to “Not Available” in the table for the date sent to the contractor means that after a thorough review of the file, such submission to the contractor could not be found.

Table 6. Example of Pre-Priced Task/Delivery Order Timelines. Adapted from Department of the Army (n.d.).

Dollar Value	TO/DO Number	CRP Accepted	TO/DO Sent to Contractor	TO/DO Signed by Contractor	TO/DO Award	Time CRP to Award
\$1M	21-F-0175	12/10/2020	Not Available	9/16/2021	9/20/2021	284
\$1B	21-F-0147	8/17/2020	Not Available	3/25/2021	3/26/2021	221
\$290K	22-F-0123	11/10/2021	2/17/2022	3/1/2022	3/1/2022	111
\$8K	21-F-0155	11/24/2020	12/23/2020	2/16/2021	2/17/2021	85
\$11K	20-F-0335	1/31/2020	3/18/2020	3/31/2020	4/1/2020	61
\$600K	22-F-0062	10/15/2021	11/23/2021	12/6/2021	12/7/2021	53
\$2M	19-F-0087	10/31/2018	Not Available	12/13/2018	12/17/2018	47
\$2M	20-F-0389	4/6/2020	4/23/2020	5/11/2020	5/11/2020	35
\$11K	21-F-0352	5/19/2021	5/25/2021	6/17/2021	6/22/2021	34
\$213K	22-F-0074	11/4/2021	11/23/2021	12/6/2021	12/7/2021	33
\$495K	21-F-0416	7/19/2021	Not Available	8/20/2021	8/20/2021	32
\$5K	21-F-0163	12/3/2020	12/8/2020	12/23/2020	12/23/2020	20
\$5M	21-F-0358	8/11/2021	Not Available	8/26/2021	8/30/2021	19
\$11K	22-F-0151	1/3/2022	1/6/2022	1/20/2022	1/20/2022	17
\$481K	21-F-0105	10/16/2020	10/27/2020	10/29/2020	11/2/2020	17
\$22K	21-F-0347	5/17/2021	5/20/2021	6/1/2021	6/2/2021	16
\$483K	19-F-0133	8/26/2019	Not Available	9/10/2019	9/11/2019	16
\$470K	21-F-0301	7/22/2021	7/23/2021	8/3/2021	8/4/2021	13
\$9K	21-F-0251	2/16/2021	2/17/2021	2/25/2021	3/1/2021	13
\$1M	19-F-0222	1/17/2019	Not Available	1/28/2019	1/30/2019	13
\$145M	21-F-0188	4/19/2021	Not Available	4/27/2021	4/29/2021	10
\$180K	20-F-0525	8/17/2020	8/21/2020	8/26/2020	8/27/2020	10
\$11K	21-F-0356	5/24/2021	5/25/2021	6/1/2021	6/2/2021	9
\$2M	20-F-0116	11/13/2019	Not Available	11/20/2019	11/21/2019	8
\$28K	21-F-0387	6/24/2021	Not Available	6/28/2021	6/30/2021	6
\$317K	20-F-0061	10/3/2019	10/4/2019	10/9/2019	10/9/2019	6
\$588K	22-F-0120	12/2/2021	11/23/2021	12/6/2021	12/7/2021	5
\$803K	21-F-0134	11/16/2020	Not Available	Unknown	11/20/2020	4
\$35K	22-F-0115	11/15/2021	Not Available	11/18/2021	11/18/2021	3
\$314M	21-F-0024	1/26/2021	Not Available	1/28/2021	1/29/2021	3
\$10M	21-F-0313	4/21/2021	Not Available	4/22/2021	4/23/2021	2
\$10M	21-F-0354	3/31/2020	Not Available	4/2/2020	4/2/2020	2
\$120K	22-F-0146	1/11/2022	1/10/2022	1/12/2022	1/12/2022	1
\$253K	21-F-0327	8/26/2021	8/17/2021	8/24/2021	8/27/2021	1
\$11M	19-F-0144	12/11/2018	Not Available	12/11/2018	12/12/2018	1

An additional review of the three actions over 100 days was conducted. For action 21-F-0175, the PCF notes indicate that receipt of funding was an issue from February 6, 2021 through September 7, 2021. As such, the CRP was not complete as indicated in the PCF milestones. Action 21-F-0147 was to exercise an option no later than March 1, 2021. However, the delay between intended award of March 1, 2021 and actual award of March 26, 2021 also appears to be related to funding issues, according to the PCF notes.

The other action over 100 days of PALT is 22-F-0123. In this instance, the order was for the establishment of a new field service representative in a country the contractor had no previous business relationship with. According to the notes and other information in the PCF file, multiple meetings regarding research into the country's regulatory requirements for establishing a business entity were held, thereby delaying the award of the requirement.

There are various other reasons for pre-priced task/delivery orders to take one day or more to award. Of the examples provided, all were issued bilaterally. For the actions that identified the date the order was sent to the contractor for signature, Table 7 shows that contractor reviews can take a couple of days, weeks, or more.

Table 7. Example of Contractor Signature Timelines. Adapted from Department of the Army (n.d.).

Dollar Value	TO/DO Number	TO/DO Sent to Contractor	TO/DO Signed by Contractor	Time for Contractor Signature
\$7K	21-F-0155	12/23/2020	2/16/2021	55
\$11K	21-F-0352	5/25/2021	6/17/2021	23
\$2M	20-F-0389	4/23/2020	5/11/2020	18
\$5K	21-F-0163	12/8/2020	12/23/2020	15
\$11K	22-F-0151	1/6/2022	1/20/2022	14
\$11K	20-F-0335	3/18/2020	3/31/2020	13
\$574K	22-F-0062	11/23/2021	12/6/2021	13
\$213K	22-F-0074	11/23/2021	12/6/2021	13
\$588K	22-F-0120	11/23/2021	12/6/2021	13
\$291K	22-F-0123	2/17/2022	3/1/2022	12
\$22K	21-F-0347	5/20/2021	6/1/2021	12
\$470K	21-F-0301	7/23/2021	8/3/2021	11
\$9K	21-F-0251	2/17/2021	2/25/2021	8
\$11K	21-F-0356	5/25/2021	6/1/2021	7
\$253K	21-F-0327	8/17/2021	8/24/2021	7
\$180K	20-F-0525	8/21/2020	8/26/2020	5
\$317K	20-F-0061	10/4/2019	10/9/2019	5
\$481K	21-F-0105	10/27/2020	10/29/2020	2
\$120K	22-F-0146	1/10/2022	1/12/2022	2

For actions 21-F-0155 and 21-F-0352 in Table 7, the contractor refused to sign the task/delivery orders until authorized to use the Army integrated bench test facility (IBTF) to verify software loads. These were pre-priced task/delivery orders for software loads on various components, and the IBTF is owned by the Army. Order 20-F-0389 is one that awarded with the base IDIQ contract to obligate the minimum quantity/dollar value; therefore, could not be awarded until the base contract had been issued.

Other instances for award delay may occur as well. The various contract writing systems utilized by the ACC-RSA occasionally become inaccessible, sometimes for days at a time. In addition, network/internet accessibility can also cause delays outside of individual contracting control.

E. ACC-RSA PALT GOALS AND EXAMPLE TIMELINES

Table 8 represents the internal ACC-RSA PALT goals by category and dollar value. While titled as being FY 2019 PALT Goals, they remain effective as of this writing. Of note, the PALT breakout of actions directly aligns with the DOD's expansion to the federal category management initiative related to reporting of Product Service Codes (PSC). While category management is not a subject of this writing, it is interesting that PALT and category management have become blended.

Table 8. ACC-RSA PALT Goals. Source: ACC-RSA (2022).

Fiscal Year (FY) 2019 Procurement Administrative Lead Time (PALT) Goals					
Aircraft & Land Vehicles	Days		Miscellaneous S&E	Days	
	Above \$250M	270		Above \$250M	270
	\$100M to \$250M	270		\$100M to \$250M	270
	\$10M to \$100M	270		\$10M to \$100M	270
	\$250K to \$10M	260		\$250K to \$10M	70
	Below \$250K	70		Below \$250K	30
Clothing, Textiles & Subsistence S&E	Above \$250M	270	Office Management	Above \$250M	270
	\$100M to \$250M	270		\$100M to \$250M	270
	\$10M to \$100M	100		\$10M to \$100M	270
	\$250K to \$10M	60		\$250K to \$10M	75
	Below \$250K	30		Below \$250K	30
Electronic & Communication Equipment	Above \$250M	240	Professional Services	Above \$250M	270
	\$100M to \$250M	270		\$100M to \$250M	270
	\$10M to \$100M	270		\$10M to \$100M	270
	\$250K to \$10M	120		\$250K to \$10M	80
	Below \$250K	50		Below \$250K	40
Electronic & Communication Services	Above \$250M	270	Research and Development	Above \$250M	270
	\$100M to \$250M	270		\$100M to \$250M	270
	\$10M to \$100M	200		\$10M to \$100M	150
	\$250K to \$10M	80		\$250K to \$10M	100
	Below \$250K	30		Below \$250K	60
Equipment Related Services	Above \$250M	270	Security and Protection	Above \$250M	270
	\$100M to \$250M	270		\$100M to \$250M	170
	\$10M to \$100M	270		\$10M to \$100M	270
	\$250K to \$10M	120		\$250K to \$10M	85
	Below \$250K	40		Below \$250K	40
Facilities & Construction	Above \$250M	170	Sustainment S&E	Above \$250M	270
	\$100M to \$250M	270		\$100M to \$250M	270
	\$10M to \$100M	250		\$10M to \$100M	270
	\$250K to \$10M	105		\$250K to \$10M	225
	Below \$250K	50		Below \$250K	45
Human Capital	Above \$250M	270	Transportation and Logistics Services	Above \$250M	170
	\$100M to \$250M	270		\$100M to \$250M	270
	\$10M to \$100M	270		\$10M to \$100M	200
	\$250K to \$10M	90		\$250K to \$10M	100
	Below \$250K	40		Below \$250K	35
Industrial Products & Services	Above \$250M	230	Travel & Lodging	Above \$250M	270
	\$100M to \$250M	230		\$100M to \$250M	270
	\$10M to \$100M	220		\$10M to \$100M	270
	\$250K to \$10M	130		\$250K to \$10M	65
	Below \$250K	50		Below \$250K	30
IT	Above \$250M	270	Weapons & Ammunition	Above \$250M	270
	\$100M to \$250M	270		\$100M to \$250M	270
	\$10M to \$100M	215		\$10M to \$100M	270
	\$250K to \$10M	80		\$250K to \$10M	180
	Below \$250K	40		Below \$250K	60
Medical	Above \$250M	270			
	\$100M to \$250M	270			
	\$10M to \$100M	270			
	\$250K to \$10M	90			
	Below \$250K	35			

The PALT goals do not separate competitive, sole source, or set-aside contract actions, nor does it address if the actions are new starts, modifications, or task/delivery

orders. It is further noted that the PALT goals stated, in most cases, have the same PALT time for all actions greater than \$10 million regardless of what the procurement is for. In some cases, the PALT goal is less for actions above \$250 million than it is for actions at the \$10-million level.

The ACC-RSA further breaks down PALT by specific milestones based on the separate actions required to get from receipt of the CRP to award, to meet the overall PALT goals described. These milestones include building the solicitation, legal reviews, receipt of proposal, etc. and are calculated by days for each milestone. Many of these milestones are required by the FAR, DFARS, AFARS, and/or ACC-RSA policy.

Table 9 represents the steps required at the contracting level, as this researcher knows them, to achieve award for sole-sourced, FFP, negotiated actions above the simplified acquisition threshold. Some of the thresholds mentioned have exceptions and/or waivers available, so are not all encompassing. In addition, many of the steps apply to competitive and set-aside actions as well.

Table 9. ACC-RSA Required Actions for Sole-Sourced, FFP, Negotiated Actions. Source: ACC-RSA (2022).

Steps to Reach Contract Award: Sole Sourced, FFP, Negotiated Actions	Threshold
CRP Complete and Accepted - Starts PALT	
DD2579 Approved (FAR 19.402)	Actions > \$10,000
Synopsis (FAR 5.101)	Actions >\$25,000
Steps to Issue Solicitation	
Prepare Solicitation	
Team Lead and/or Contracting Officer Reviews	
Legal Review (ACC-RSA policy)	Actions \$550,000 and above
Branch Chief Review (ACC-RSA policy)	Actions <\$25M
COCO Review (AFARS 5115.406-1, 5101.170, and ACC-RSA policy)	Actions \$25M to <\$250M
SCO Peer Review/SRB (AFARS 5115.406-1, 5101.170, ACC-RSA policy)	Actions \$250M and above
DPC Peer Review (DFARS 201.170, AFARS 5101.170, and ACC-RSA policy)	Actions \$1B and above
Proposal Receipt	
Contractor Requests for Information or Clarifications	
Contractor Build of Proposal	
Contractor Internal Reviews and Final Approval of Proposal	
Evaluation	
Requiring Office Technical Evaluation	
Defense Contract Audit Agency (DCAA) Audit (DFARS 215.204-2)	FFP actions >\$10M
Defense Contract Management Agency (DCMA) Technical and Pricing Evaluation (DFARS 215.204-2, preferable for actions above the cost or pricing data submission requirement, if available)	Recommended for actions above \$2M
Pre-Negotiation Objective Memorandum (POM)	
Write POM	
Team Lead and/or Contracting Officer Reviews	
Branch Chief Review (ACC-RSA policy)	Actions <\$25M
COCO Review (AFARS 5115.406-1 and ACC-RSA policy)	Actions \$25M to <\$250M
Negotiations	
Additional Requests for Information from Both Parties	
Stalemates and/or Disagreements	
Submission of Contractor Certified Cost or Pricing Data (FAR 15.403-4)	Actions \$2M and above
Post-Negotiation Memorandum (PNM)	
Write PNM	
Team Lead and/or Contracting Officer Reviews	
Branch Chief Review (ACC-RSA policy)	Actions <\$25M
COCO Review (AFARS 5115.406-1 and 5101.170)	Actions \$25M to <\$250M
SCO Peer Review/Contract Review Board (CRB) (AFARS 5101.170)	Actions \$50M and above
Defense Pricing and Contracting (DPC) Peer Review (DFARS 219.201-170) for Major Defense Acquisition Programs (MDAP)	Actions \$1B and above
Build Contract Award	
Write Contract	
Team Lead and/or Contracting Officer Reviews	
Legal Review (ACC-RSA policy)	Actions \$550,000 and above
Branch Chief Review (ACC-RSA policy)	Actions <\$25M
Contractor Review	
Contractor Signature (Required before Announcement of Award)	
Announcement of Award/Congressional Notification (DFARS 205.303)	Actions \$7.5M and above
Award	

As can be seen in Table 9, there are multiple steps, many of which are regulatory or ACC-RSA directed, to reach award. Such steps within the PALT take time to complete,

as shown in Table 10. This table presents the actual PALT timelines for the actions described in Table 5, with the five unawarded solicitations removed. In addition, the Estimated Dollar Value in Table 5 has been updated to reflect the actual Awarded Dollar Value.

Table 10. Example of ACC-RSA Actual Award Timelines. Adapted from Department of the Army (n.d.).

Awarded Dollar Value	Contract Number	DD Form 2579 Approved	Contract Awarded	PALT from DD Form 2579 Approval to Award
\$6B	17-C-0009	1/14/2014	6/22/2017	1255
\$11M	16-D-0050	6/19/2013	7/26/2016	1133
\$4M	17-C-0054	7/29/2014	6/1/2017	1038
\$34M	21-C-0039	4/23/2019	9/21/2021	882
\$59M	19-C-0013	8/1/2016	12/20/2018	871
\$69M	16-D-0055	7/9/2014	9/27/2016	811
\$91M	19-D-0079	8/23/2017	6/25/2019	671
\$3M	20-C-0026	6/11/2018	4/6/2020	665
\$17M	20-D-0056	7/19/2018	5/11/2020	662
\$4M	21-C-0050	10/25/2019	7/12/2021	626
\$1M	16-C-0003	9/18/2014	6/3/2016	624
\$10M	21-C-0021	8/1/2019	11/12/2020	469
\$29M	18-D-0058	8/2/2017	9/27/2018	421
\$4M	15-C-0063	7/9/2014	6/30/2015	356

Awarded Dollar Value	Contract Number	DD Form 2579 Approved	Contract Awarded	PALT from DD Form 2579 Approval to Award
\$24M	17-D-0033	6/15/2016	5/31/2017	350
\$960K	15-C-0001	12/11/2013	11/18/2014	342
\$16M	21-C-0029	5/22/2020	3/23/2021	305
\$600K	20-D-0028	5/30/2019	3/17/2020	292
\$1M	19-C-0021	6/8/2018	2/21/2019	258
\$16M	19-D-0013	4/11/2018	12/11/2018	244
\$147M	18-C-0017	7/17/2017	1/11/2018	178
\$1M	21-C-0010	6/30/2020	12/23/2020	176
\$6M	17-C-0034	8/8/2016	12/22/2016	136
\$60M	20-C-0032	5/20/2020	9/14/2020	117
\$14M	21-C-0065	7/1/2021	9/27/2021	88

Table 10 has the same stipulations as Table 5. There are no dollar value limitations or type of contract award. There is also the same mix of hardware and service type contracts. In order to understand where some of the delays may occur during the award process, the following tables break down some of the award process steps. Note that timelines for SRBs and other pre-solicitation actions have been presented in paragraph C., titled The Gap Between ARLT and PALT at ACC-RSA. As such, the tables represent timelines after release of the solicitation.

The first step after release of the solicitation is receipt of the contractor's proposal. The proposal receipt timelines are predominately from the evaluation start date due to the proposal receipt date not being an option or required milestone within the PCF database at

the time the contract was awarded. In addition, many of the Prenegotiation Objective Memorandums (POMs) and Post-Negotiation Memorandums (PNMs) were reviewed to ensure the proposal receipt/evaluation dates were correct. Every effort was made to reflect accurate dates in this report.

Table 11. Example Proposal Receipt Timelines. Adapted from Department of the Army (n.d.).

Awarded Dollar Value	Contract Number	Solicitation Issued	Proposal Received/ Evaluation Start	Time for Proposal Receipt
\$6B	17-C-0009	4/25/2014	7/21/2016	818
\$11M	16-D-0050	11/7/2013	3/17/2015	495
\$17M	20-D-0056	8/8/2018	7/29/2019	355
\$4M	15-C-0063	9/3/2014	6/30/2015	300
\$59M	19-C-0013	12/7/2016	9/21/2017	288
\$3M	20-C-0026	6/25/2018	3/1/2019	249
\$29M	18-D-0058	8/29/2017	4/10/2018	224
\$91M	19-D-0079	10/6/2017	5/2/2018	208
\$69M	16-D-0055	10/13/2015	4/21/2016	191
\$960K	15-C-0001	2/27/2014	9/2/2014	187
\$24M	17-D-0033	7/26/2016	12/16/2016	143
\$147M	18-C-0017	8/17/2017	1/3/2018	139
\$4M	17-C-0054	8/25/2014	12/19/2014	116
\$10M	21-C-0021	12/12/2019	4/6/2020	116
\$34M	21-C-0039	7/30/2019	11/14/2019	107

Awarded Dollar Value	Contract Number	Solicitation Issued	Proposal Received/ Evaluation Start	Time for Proposal Receipt
\$16M	21-C-0029	6/12/2020	9/2/2020	82
\$1M	16-C-0003	10/14/2014	12/17/2014	64
\$1M	19-C-0021	7/2/2018	8/23/2018	52
\$16M	19-D-0013	5/2/2018	6/18/2018	47
\$600K	20-D-0028	7/3/2019	8/16/2019	44
\$1M	21-C-0010	7/17/2020	8/20/2020	34
\$60M	20-C-0032	6/3/2020	7/6/2020	33
\$6M	17-C-0034	11/9/2016	12/7/2016	28
\$14M	21-C-0065	7/30/2021	8/18/2021	19
\$4M	21-C-0050	5/18/2021	5/28/2021	10

There are several reasons for the proposal delays shown in Table 11. According to the PCF comments and a review of the PCF cabinets, actions that were over 300 days for proposal receipt include 17-C-0009. This contract was issued as a sole sourced multi-year production contract for a major weapons system, awarded at a value estimated to be \$6 billion, including options. Within the PCF milestones, it is noted that the proposal was received; however, it included severe inadequacies and resulted in an adverse audit opinion, which required resubmissions of the proposal.

For action 16-D-0050, the PCF cabinet clearly shows that seven solicitation amendments were issued between February 20, 2014 and July 10, 2014. Most of the amendments were issued to make changes to the spare parts listing of the requirement, after the contractor had received the solicitation. There are no notes indicating if the contractor or the government were instigating such changes.

Contract action 20-D-0056 indicates in the PCF notes that there were contractor pricing errors and revised proposals being submitted by the contractor. In addition, the PNM states that the government removed part of the requirement after reviewing the contractor's proposal, thereby requiring another revised proposal. The initial proposal had been received December 20, 2018, with the revised proposal coming in July 29, 2019.

Of particular interest is 15-C-0063, which was issued as an UCA. Such UCA actions are intended to be awarded in an expedited manner. There are no notes within the PCF database or cabinet files to indicate why the not-to-exceed proposal for an UCA action was significantly delayed. This solicitation was also issued on a sole-source basis.

For negotiated actions, after proposal receipt, the government typically submits the proposal to the program office and DCMA for evaluations, depending on the dollar value. Negotiated actions less than \$2 million, as indicated in Table 9, include the contracting officer doing the price analysis along with program office technical evaluations. After such evaluations are completed, a POM is prepared for all actions requiring a negotiation in accordance with FAR 15.406-1. Table 12 utilizes the same contract actions as Tables 10 and 11, indicating the length of time such evaluations and POM preparations can take.

Table 12. Example Evaluation Timelines. Adapted from Department of the Army (n.d.).

Awarded Dollar Value	Contract Number	Proposal Received/ Evaluation Start	Negotiations Start	Evaluation and POM Approvals
\$4M	17-C-0054	12/19/2014	11/3/2016	685
\$34M	21-C-0039	11/14/2019	6/18/2020	217
\$17M	20-D-0056	7/29/2019	1/4/2020	159
\$69M	16-D-0055	4/21/2016	9/2/2016	134
\$10M	21-C-0021	4/6/2020	8/6/2020	122
\$1M	21-C-0010	8/20/2020	12/14/2020	116
\$600K	20-D-0028	8/16/2019	11/27/2019	103
\$1M	16-C-0003	12/17/2014	3/19/2015	92
\$16M	19-D-0013	6/18/2018	9/12/2018	86
\$91M	19-D-0079	5/2/2018	7/26/2018	85
\$3M	20-C-0026	3/1/2019	5/20/2019	80
\$11M	16-D-0050	3/17/2015	5/14/2015	58
\$59M	19-C-0013	9/21/2017	11/16/2017	56
\$6B	17-C-0009	7/21/2016	9/8/2016	49
\$16M	21-C-0029	9/2/2020	10/20/2020	48
\$1M	19-C-0021	8/23/2018	10/4/2018	42
\$14M	21-C-0065	8/18/2021	9/16/2021	29
\$29M	18-D-0058	4/10/2018	5/3/2018	23
\$960K	15-C-0001	9/2/2014	9/10/2014	8

Awarded Dollar Value	Contract Number	Proposal Received/ Evaluation Start	Negotiations Start	Evaluation and POM Approvals
\$4M	21-C-0050	5/28/2021	N/A	0
\$4M	15-C-0063	6/30/2015	N/A	0
\$24M	17-D-0033	12/16/2016	N/A	0
\$147M	18-C-0017	1/3/2018	N/A	0
\$6M	17-C-0034	12/7/2016	N/A	0
\$60M	20-C-0032	7/6/2020	N/A	0

As can be seen in Table 12, significant delays to reach award can occur during the evaluations. Of the actions indicating N/A in the negotiations start date column, contract 21-C-0050, was a competitive small business set-aside. The remaining five actions with no negotiation start dates were issued as UCAs or letter contracts. Such actions are evaluated and negotiated after award of the UCA or letter contract as a subsequent modification to the contract action.

In contract action 17-C-0054, the PCF file indicates several reasons for the significant delay. These reasons include multiple requests for information being sent to the sole-source contractor for information missing from the proposal, substantial exceptions from the proposal taken in the DCMA and program office evaluations, and changes in the requirements after receipt of the proposal. Also of note is that the POM required multiple resubmissions and rework prior to final approval.

Action 21-C-0039 indicates inadequate subcontractor information provided in the proposal, disagreements with the contractor as to the contract type, and three weeks for the POM to process through reviews before approval to open negotiations. For contract 20-D-0056, delays occurred during the evaluation due to the complexity of the proposal, and nearly three months were required to prepare and approve the POM prior to opening

negotiations. In this case, the POM reviews and approvals occurred during November and December 2019. During this timeframe, many personnel are out of the office due to the holidays and use-or-lose annual leave situations. While not an excuse for such delays, it does relate to other timelines in which the absence of contracting officers and others within the review chain can affect the overall PALT of an action.

Tables 11 and 12 show the timelines between release of a solicitation and proposal receipt, and the time from proposal receipt to opening of negotiations, respectively. Table 13 will look at the time it can take to negotiate a contract action. This table utilizes the same contract actions as previously presented and is sorted by the length of time it took to negotiate. As previously stated, actions with N/A for the negotiation start date are either competitive small business set asides or UCAs. These actions also include N/A as the negotiation completion date as no negotiations were conducted at the time of award of the base contract.

Table 13. Example Negotiation Completion Timelines. Adapted from Department of the Army (n.d.).

Awarded Dollar Value	Contract Number	Negotiations Start	Negotiations Complete	Negotiation Time
\$34M	21-C-0039	6/18/2020	6/28/2021	375
\$59M	19-C-0013	11/16/2017	11/19/2018	368
\$11M	16-D-0050	5/14/2015	5/11/2016	363
\$1M	16-C-0003	3/19/2015	3/8/2016	355
\$3M	20-C-0026	5/20/2019	2/20/2020	276
\$91M	19-D-0079	7/26/2018	4/19/2019	267
\$6B	17-C-0009	9/8/2016	3/16/2017	189
\$4M	17-C-0054	11/3/2016	3/28/2017	145
\$29M	18-D-0058	5/3/2018	9/24/2018	144
\$1M	19-C-0021	10/4/2018	1/31/2019	119
\$17M	20-D-0056	1/4/2020	3/27/2020	83
\$10M	21-C-0021	8/6/2020	10/28/2020	83
\$600K	20-D-0028	11/27/2019	2/6/2020	71
\$960K	15-C-0001	9/10/2014	10/17/2014	37
\$16M	19-D-0013	9/12/2018	10/12/2018	30
\$16M	21-C-0029	10/20/2020	11/16/2020	27
\$1M	21-C-0010	12/14/2020	12/22/2020	8
\$14M	21-C-0065	9/16/2021	9/24/2021	8
\$69M	16-D-0055	9/2/2016	9/9/2016	7
\$4M	21-C-0050	N/A	N/A	0
\$4M	15-C-0063	N/A	N/A	0
\$24M	17-D-0033	N/A	N/A	0
\$147M	18-C-0017	N/A	N/A	0
\$6M	17-C-0034	N/A	N/A	0
\$60M	20-C-0032	N/A	N/A	0

Negotiating the contract type continued to be an issue for 21-C-0039, according to the PCF milestone comments. The government intended to issue an FFP-Incentive Fee firm target type of contract with minor Cost-Plus Fixed Fee (CPFF) elements. However, the contractor refused to accept an incentive fee type of contract and insisted the action be FFP with the minor CPFF elements. According to the PNM, the situation was elevated through ACC-RSA management, and resulted in this sole source contractor obtaining the FFP and CPFF contract requested after nine months of negotiations.

Contract action 19-C-0013 sustained different types of delays. The contractor's first counteroffer was received over seven weeks after the opening of negotiations. Such contractor counteroffer delays appear to be a significant factor throughout this negotiation, according to the PCF comments. In addition, the contractor's second counteroffer included additional effort not initially proposed that required government evaluation. Disagreements about the required materials were also present within the contract file for this FFP long-lead material and spares contract.

Delays in the contractor's counteroffers appears to also be an issue with action 16-D-0050, according to the PCF comments. In this case, the government opened negotiations in May 2015 and the first contractor counteroffer was received in December 2015, more than six months after the opening of negotiations. According to the PNM, multiple issues affected the counteroffer delays, including disagreement of what spares should be included in the requirement, the sale of the of contractor to another parent company, and the resultant updated forward pricing rate proposals.

The last action in Table 13 in which negotiations took over 300 days is 16-C-0003. In this instance, delays appear to be related to the contractor repeatedly changing the make or buy quotas from their original proposal. In one instance, the contractor took nearly four months to submit an acceptable counteroffer. The file also indicates negotiation issues regarding indirect rates and profit.

The next step after negotiation completion is preparation and approval of the PNM, receipt of certified cost or pricing data, if required, CRB/Peer Review, and congressional announcement of award, if required. Table 14 provides an insight into these timelines. As

previously stated, this sample is not intended to be statistically significant to the thousands of contracts issued at ACC-RSA. The purpose of this table is to indicate how long processes within the PALT to award a contract can take, and to identify some of the reasons for such delays.

Table 14. Example Post Negotiation Timelines. Adapted from Department of the Army (n.d.).

Awarded Dollar Value	Contract Number	Negotiations Complete	Certified Cost or Pricing Data Received	CRB/Peer Reviews Completed	PNM Approved	Announcement of Award Posted	Contract Awarded	Post-Negotiation Process Timeline
\$16M	21-C-0029	11/16/2020	11/23/2020	N/A	1/2/2021	Unknown	3/23/2021	127
\$6B	17-C-0009	3/16/2017	4/20/2017	5/15/2017	5/15/2017	5/31/2017	6/22/2017	98
\$1M	16-C-0003	3/8/2016	4/1/2016	N/A	4/21/2016	N/A	6/3/2016	87
\$34M	21-C-0039	6/28/2021	7/7/2021	9/15/2021	9/15/2021	9/27/2021	9/21/2021	85
\$11M	16-D-0050	5/11/2016	5/24/2016	N/A	6/6/2016	7/20/2016	7/26/2016	76
\$91M	19-D-0079	4/19/2019	4/12/2019	6/14/2019	6/14/2019	6/18/2019	6/25/2019	67
\$4M	17-C-0054	3/28/2017	4/28/2017	N/A	5/3/2017	N/A	6/1/2017	65
\$16M	19-D-0013	10/12/2018	10/15/2018	11/6/2018	11/6/2018	12/6/2018	12/11/2018	60
\$3M	20-C-0026	2/20/2020	2/28/2020	N/A	3/9/2020	N/A	4/6/2020	46
\$17M	20-D-0056	3/27/2020	4/8/2020	N/A	4/9/2020	Unknown	5/11/2020	45
\$600K	20-D-0028	2/6/2020	N/A	N/A	2/18/2020	N/A	3/17/2020	40
\$960K	15-C-0001	10/17/2014	11/6/2014	N/A	11/6/2014	N/A	11/18/2014	32
\$59M	19-C-0013	11/19/2018	12/10/2018	12/19/2018	12/19/2018	12/18/2018	12/20/2018	31
\$1M	19-C-0021	1/31/2019	N/A	N/A	2/6/2019	N/A	2/21/2019	21
\$69M	16-D-0055	9/9/2016	9/16/2016	9/26/2016	9/26/2016	9/23/2016	9/27/2016	18
\$10M	21-C-0021	10/28/2020	11/3/2020	N/A	12/7/2020	Unknown	11/12/2020	15
\$29M	18-D-0058	9/24/2018	9/24/2018	N/A	9/26/2018	9/26/2018	9/27/2018	3
\$14M	21-C-0065	9/24/2021	9/24/2021	N/A	9/27/2021	9/27/2021	9/27/2021	3
\$1M	21-C-0010	12/22/2020	N/A	N/A	12/22/2020	N/A	12/23/2020	1
\$4M	15-C-0063	N/A	N/A	N/A	N/A	N/A	6/30/2015	0
\$6M	17-C-0034	N/A	N/A	N/A	N/A	N/A	12/22/2016	0
\$24M	17-D-0033	N/A	N/A	N/A	N/A	5/25/2017	5/31/2017	0
\$147M	18-C-0017	N/A	N/A	N/A	N/A	1/9/2018	1/11/2018	0
\$60M	20-C-0032	N/A	N/A	N/A	N/A	Unknown	9/14/2020	0
\$4M	21-C-0050	N/A	N/A	N/A	N/A	N/A	7/12/2021	0

Five of the actions in Table 14 took over 70 days to award after the completion of negotiations. Of note is 21-C-0029 at 127 days. This action did not require a CRB/Peer Review, yet the PNM took 47 days to complete and approve. There are no notes within the PCF cabinet to explain this delay in PNM approval. However, there are multiple comments within the PCF milestones related to awaiting sufficient funding which prevented the final drafting of the contract. This is due to funding being required to build the contract line-item numbers. As a result, another 80 days of delay are attributed to the funding issues.

For contract 17-C-0009, the first delay was the 35 days it took for the contractor to submit their certified cost or pricing data. Once the data was received, the PNM could be submitted for CRB/Peer Review. This CRB/Peer Review process took another 25 days. Once the internal ACC-RSA CRB/Peer Review was completed, a waiver from conducting a DPC Peer Review was sought and received. The higher-level review would otherwise have been required based on the dollar value of the contract, per Table 9.

The issues with contract 16-C-0003 appear to be contractor related. It took 24 days to receive the certified cost or pricing data. In addition, per the PCF milestone notes, it took another 50 days for the contractor to review and sign the contract due to disagreements with three clauses.

The contract file for 21-C-0039 does not discuss the significant delay in the CRB/Peer Review process for PNM approval. However, there are indications in the CRB folder that the Peer Review process did not start until late August 2021, two months after completion of negotiations. In addition, there are multiple comments regarding delayed funding issues. There are also seven congressional notification documents within the contract file, each changing the award date. The date indicated in Table 14 is the date identified in the final approved notification. Finally, a review of the contract files shows that the contract was awarded in the contract writing system on 21 September 2021; however, the final contractor signature was not received until 27 September 2021.

The last action over 70 days for award after negotiation completion is 16-D-0050. In this case, the contractor requested changes to the delivery schedule and clauses. According to the PCF milestone notes, these changes required coordination with the

program office and legal advisor. One of the contractor's requested clause changes required the contracting office to seek a waiver to a DFARS-required clause.

As indicated, there are multiple reasons for contract award delays and misconceptions as to what point PALT should start. The next section will look at how the OMB-OFPP proposes to capture PALT and other possible options of doing so.

F. REPORTING OF PALT IN FPDS-NG

As previously discussed, the FPDS-NG is the proposed tracking mechanism for PALT. The reported information is publicly available and user friendly. However, the reporting of solicitation issuance date does not align with actions performed by the contracting offices prior to release of the solicitation. This will likely result in inaccurate reporting of PALT to not only the public, but to government officials as well. In addition, the reporting of dates does not tell the story of the circumstances behind delays in contract awards. It only reports that such delays exist.

A consolidation of the PALT timelines is provided in Table 15 and indicates significant deficiencies in the use of the solicitation release date as beginning the PALT. As can be seen, a lag of weeks, months, or even years can occur between receipt of a completed CRP and issuance of the solicitation. Note that issuance of the DD Form 2579 has been utilized as CRP acceptance throughout this discussion.

Table 15. Example DD Form 2579 Approval/Solicitation Issuance Gaps.
Adapted from Department of the Army (n.d.).

Awarded Dollar Value	Contract Number	Contract Awarded	PALT from DD Form 2579 Approval to Award	PALT from Solicitation Issuance to Award	DD Form 2579 Approval / Solicitation Issuance Gap
\$4M	21-C-0050	7/12/2021	626	55	571
\$69M	16-D-0055	9/27/2016	811	350	461
\$11M	16-D-0050	7/26/2016	1133	992	141
\$10M	21-C-0021	11/12/2020	469	336	133
\$59M	19-C-0013	12/20/2018	871	743	128
\$6B	17-C-0009	6/22/2017	1255	1154	101
\$34M	21-C-0039	9/21/2021	882	784	98
\$6M	17-C-0034	12/22/2016	136	43	93
\$960K	15-C-0001	11/18/2014	342	264	78
\$4M	15-C-0063	6/30/2015	356	300	56
\$91M	19-D-0079	6/25/2019	671	627	44
\$24M	17-D-0033	5/31/2017	350	309	41
\$600K	20-D-0028	3/17/2020	292	258	34
\$147M	18-C-0017	1/11/2018	178	147	31
\$14M	21-C-0065	9/27/2021	88	59	29
\$29M	18-D-0058	9/27/2018	421	394	27
\$4M	17-C-0054	6/1/2017	1038	1011	27
\$1M	16-C-0003	6/3/2016	624	598	26

Awarded Dollar Value	Contract Number	Contract Awarded	PALT from DD Form 2579 Approval to Award	PALT from Solicitation Issuance to Award	DD Form 2579 Approval / Solicitation Issuance Gap
\$1M	19-C-0021	2/21/2019	258	234	24
\$16M	21-C-0029	3/23/2021	305	284	21
\$16M	19-D-0013	12/11/2018	244	223	21
\$17M	20-D-0056	5/11/2020	662	642	20
\$1M	21-C-0010	12/23/2020	176	159	17
\$60M	20-C-0032	9/14/2020	117	103	14
\$3M	20-C-0026	4/6/2020	665	651	14

There may also be gaps between what is reported and verifiable in PCF via the official contract file, and what is being reported in the FPDS-NG system. During a review of the FPDS NG reported CARs, it was noted that the solicitation date was not an available field until approximately FY 2017. As mentioned in Chapter I, the FPDS-NG system automatically pulls information, such as the solicitation release date. The PCF contract cabinets are dependent on data input from the contracting personnel working the requirement.

Table 16 provides some indication as to how the two solicitation release dates between PCF and FPDS-NG can potentially vary at the base contract level. The reviewed contracts are the same as the previous analyses. The nine actions reflecting “N/A” are due to being issued prior to the solicitation date being an available field in FPDS-NG. For the one action reflecting a “Not Entered” in the FPDS-NG field, no clear explanation in the file could be found. However, while the field was available, it may not have been required at that time.

Table 16. Example Solicitation Release Date Gaps – Base Contracts.
Adapted from Department of the Army (n.d.).

Awarded Dollar Value	Contract Number	PCF Solicitation Issued	FPDS-NG Solicitation Issued	Delta
\$10M	21-C-0021	12/12/2019	10/21/2020	314
\$600K	20-D-0028	7/3/2019	1/24/2020	205
\$1M	21-C-0010	7/17/2020	12/3/2020	139
\$16M	21-C-0029	6/12/2020	8/19/2020	68
\$14M	21-C-0065	7/30/2021	8/25/2021	26
\$1M	19-C-0021	7/2/2018	7/10/2018	8
\$4M	21-C-0050	5/18/2021	5/18/2021	0
\$60M	20-C-0032	6/3/2020	6/3/2020	0
\$34M	21-C-0039	7/30/2019	7/30/2019	0
\$3M	20-C-0026	6/25/2018	6/25/2018	0
\$16M	19-D-0013	5/2/2018	5/2/2018	0
\$91M	19-D-0079	10/6/2017	10/6/2017	0
\$29M	18-D-0058	8/29/2017	8/29/2017	0
\$59M	19-C-0013	12/7/2016	12/7/2016	0
\$17M	20-D-0056	8/8/2018	7/30/2018	-9
\$147M	18-C-0017	8/17/2017	Not Entered	
\$6M	17-C-0034	11/9/2016	N/A	
\$24M	17-D-0033	7/26/2016	N/A	
\$69M	16-D-0055	10/13/2015	N/A	

Awarded Dollar Value	Contract Number	PCF Solicitation Issued	FPDS-NG Solicitation Issued	Delta
\$1M	16-C-0003	10/14/2014	N/A	
\$4M	15-C-0063	9/3/2014	N/A	
\$4M	17-C-0054	8/25/2014	N/A	
\$6B	17-C-0009	4/25/2014	N/A	
\$960K	15-C-0001	2/27/2014	N/A	
\$11M	16-D-0050	11/7/2013	N/A	

It is equally difficult to decipher the significant differences between the two systems for those actions with four weeks to nearly a year. One possibility is that the solicitation may have been issued to the contractors, but not officially released in the contract writing system. It is known to this researcher that a released solicitation does not require a contracting officer's signature on the document, thereby making a print preview of the draft solicitation identical to the version officially released. For instance, contract action 21-C-0021 has a PCF solicitation release date of December 12, 2019, and the contract was awarded on November 12, 2020. However, the FPDS-NG solicitation date is October 21, 2020. This is a strong indication that the solicitation was not released in the contract writing system until the contracting office was prepared to build the award document.

Even more dramatic issues lie with the solicitation release date for pre-priced task/delivery orders, as can be seen in Table 17. This researcher contacted the ACC-RSA Policy Team via a help ticket requesting a copy of the ACC-RSA policy related to entering solicitation dates for pre-priced task/delivery orders that have no related solicitation. The response was that there is no specific policy related to pre-priced task/delivery orders and solicitations. However, it was stated that contracting officers can use receipt of the CRP as

the solicitation release date, but there is no requirement to use the CRP date. As such, Table 17 utilizes the CRP receipt date, as reported in PCF, as the solicitation release date within the PCF system. The solicitation date for FPDS-NG was verified as being the date reported within the system. Note, as there is no solicitation for pre-priced task/delivery orders, the solicitation field in FPDS-NG is input by the contracting officer at or after award of the order.

Table 17. Example Solicitation Release Date Gaps – Pre-Priced Orders.
Adapted from Department of the Army (n.d.).

Dollar Value	TO/DO Number	PCF CRP Accepted	FPDS-NG Solicitation	Delta
\$495K	21-F-0416	7/19/2021	6/19/2015	2,222
\$588K	22-F-0120	12/2/2021	8/29/2017	1,556
\$290K	22-F-0123	11/10/2021	8/30/2017	1,533
\$317K	20-F-0061	10/3/2019	8/11/2015	1,514
\$600K	22-F-0062	10/15/2021	8/29/2017	1,508
\$314M	21-F-0024	1/26/2021	4/27/2017	1,370
\$803K	21-F-0134	11/16/2020	7/31/2017	1,204
\$481K	21-F-0105	10/16/2020	8/29/2017	1,144
\$10M	21-F-0313	4/21/2021	5/18/2018	1,069
\$145M	21-F-0188	4/19/2021	11/2/2018	899
\$2M	19-F-0087	10/31/2018	6/3/2016	880
\$2M	20-F-0116	11/13/2019	7/31/2017	835
\$483K	19-F-0133	8/26/2019	7/31/2017	756
\$2M	20-F-0389	4/6/2020	7/30/2018	616
\$1M	21-F-0175	12/10/2020	7/2/2019	527
\$1B	21-F-0147	8/17/2020	5/9/2019	466
\$5M	21-F-0358	8/11/2021	8/2/2021	9
\$11K	20-F-0335	1/31/2020	1/24/2020	7
\$253K	21-F-0327	8/26/2021	8/26/2021	0
\$470K	21-F-0301	7/22/2021	7/31/2021	-9
\$11K	22-F-0151	1/3/2022	Not Entered	0
\$120K	22-F-0146	1/11/2022	Not Entered	0
\$35K	22-F-0115	11/15/2021	Not Entered	0
\$213K	22-F-0074	11/4/2021	Not Entered	0
\$28K	21-F-0387	6/24/2021	Not Entered	0
\$11K	21-F-0356	5/24/2021	Not Entered	0
\$10M	20-F-0354	3/31/2020	Not Entered	0
\$11K	21-F-0352	5/19/2021	Not Entered	0
\$22K	21-F-0347	5/17/2021	Not Entered	0
\$9K	21-F-0251	2/16/2021	Not Entered	0
\$5K	21-F-0163	12/3/2020	Not Entered	0
\$8K	21-F-0155	11/24/2020	Not Entered	0
\$180K	20-F-0525	8/17/2020	Not Entered	0
\$1M	19-F-0222	1/17/2019	Not Entered	0
\$11M	19-F-0144	12/11/2018	Not Entered	0

The contract files do not provide specific details as to what date was used in FPDS-NG for the solicitation release date. This is due to no solicitation is directly related to such pre-priced orders. The field in FPDS-NG specifically requires a solicitation date. As such, many contracting officers may be utilizing the base contract solicitation date or inputting a random date. It is also unknown how some actions were allowed to be finalized in the FPDS-NG system without the required solicitation date.

For pre-priced task/delivery orders, the formal definition of PALT is awarding the order and issuance of the solicitation as the same date. Considering a pre-priced task order does not require a solicitation, and many do take one day or more to award, this reporting may also be misleading. As noted in Table 6, pre-priced task/delivery orders can also take upward of weeks or months to award. In the analysis of the FPDS-NG reports, it was clear that required solicitation dates for pre-priced task/delivery orders results in several inconsistent responses.

G. REPORTING OF PALT IN PCF

The PCF system is the official Army contract filing system and is utilized by Army contracting personnel for a variety of reporting such as PALT. The system allows for estimated and actual PALT milestones to be input, as well as notes related to issues encountered during the procurement process. As previously noted, this is the primary system utilized by this researcher for the analyses.

For most contract actions, the program office initiates a PCF cabinet and uploads the CRP documents. Once complete, the cabinet is submitted to the contracting office for review and acceptance. The acceptance is done via a Requirements Package Assistant (RPA) in which the contracting office identifies all documents required for a complete CRP. The contracting office can reject any document back to the program office for rework within the RPA function. Notes can also be made within the RPA to identify delays in the CRP acceptance cycle. However, these notes currently do not transfer to the Acquisition Milestones section of PCF.

It is the Acquisition Milestones section in PCF that receives the most attention from ACC-RSA management and used within the PALT analyses. A weekly report is pulled

from PCF and submitted to the workforce and management with data fields such as Current PALT, PALT Forecasted, and another field for Forecasted PALT Goal (Based on Forecasted PSC). The last field related to PSC is directly related to Table 9 and category management as previously discussed. Most importantly for this report is the inclusion of the last entered note from the Acquisition Milestones to indicate why there are or may be delays. The contract specialists enter a weekly status of the action in the Comment section of the Award milestone for each action, which is pulled into the weekly status report.

One of the obvious issues with using the PCF system governmentwide is that it is currently only utilized by the Army. In addition, as an official contract filing system that includes proprietary information, cost or pricing data, and other sensitive information, public access is not feasible. These issues will likely be troublesome for further expansion into the planned PALT tracking.

H. REPORTING OF PALT IN PIEE

Within the PIEE is a PALT, Protest Tracker, and Request for Equitable Adjustment module. The PIEE is the same system utilized for contractor payments, contracting officer representative appointments and reporting, and various other functions. Upon logging into the PALT tracker, this researcher identified actions for various DOD and other governmental agencies utilizing the database. As such, it appears the PIEE system is widely used throughout the government. On the first page of the PIEE module, the following statement is provided related to PALT:

PALT Tool – Procurement Administrative Lead Time (PALT) is the number of total days from the time of requirement identification to the time of contract award. The PALT Tracker is a web-based tool that will be used by contracting offices to track the major milestones leading up to these awards. This tool allows users to enter the estimated and actual dates of the pre-award process to include PALT milestones. (Procurement Integrated Enterprise Environment, n. d.)

While this definition of PALT does not align with either the OMB-OFPP definition or ACC-RSA's more stringent version thereof, a review of the module was conducted for viability as a tracking mechanism.

The system allows for establishing milestones from the earliest planning of the requirement, such as the Acquisition Plan, to award. It also provides for a Procurement Audit History in which the contracting officer can enter notes as to the problems or issues related to the delay of the procurement. However, the system does not appear to be generally available to the public. According to the registration help page, the system is only available to government account holder personnel and contractors registered in the System for Award Management program authorizing them to enter government contracts. In addition, a majority of the actions reviewed only included the estimated milestone dates and no notes as to if or why any dates had been exceeded or delays encountered.

I. SUMMARY: CHAPTER IV

Chapter IV provides an analysis of multiple visions of this research. First, an interview into the perceptions of OMB-OFPP at the development of the formal definition of PALT was conducted, followed by a limited insight into the program office's perspective. A review is also conducted into what PALT may be at the ACC-RSA contracting level as provided by examples of base contracts and task/delivery orders. Finally, a review into what information can be provided via various reporting systems and to whom this information is available was conducted.

In Chapter V, a summary is provided to pull all of this information together. First, a review of the PALT definition and whether the overarching ALT or subsidiary ARLT has been defined is explored. A review our findings regarding the recommended reporting system and other available options for reporting timelines and the reasons for delays is provided.

V. FINDINGS AND RECOMMENDATIONS

A. PRIMARY RESEARCH

1. Primary Research Question

As stated in Chapter I, the primary research question is if the OMB-OFPP formal definition of PALT aligns with the procurement actions required by regulation or policy to be performed by acquisition professionals to achieve award. The review consisted of current federal, DOD, and Army regulations as well as local policies. A thorough review of a small population of ACC-RSA base contracts and pre-priced task/delivery orders was also conducted. In addition, an interview with a person knowledgeable with the OMB-OFPP final decision for the formal definition was performed.

Additionally, whether the full acquisition cycle has been formally defined, or used consistently across the Government, was researched as related to the formal PALT definition. To analyze how PALT affects the acquisition community, an understanding of the full acquisition cycle is necessary to determine where PALT lies within the process. A literature review was conducted, as well as researching various federal and local definitions.

2. Primary Research Findings

At ACC-RSA, the PALT is utilized to predict contract award by number of days from receipt of a completed CRP to award of the contract. As clearly shown in Table 1, there are multiple steps required between the receipt of a completed CRP and the release of the solicitation. Most of these steps are required at the FAR, DFARS, and/or AFARS level and cannot be performed by the program offices. This indicates a significant gap between receipt of the complete CRP from the program office and release of the solicitation to which only the contracting officer can perform.

As discussed above, the interview with OMB-OFPP identified several reasons for utilizing the solicitation date as the start of PALT. These reasons included:

- The definition was derived from the FY18 NDAA and had been adopted by the DOD.
- The definition was least disruptive or controversial across the DOD elements.
- The solicitation release date was relatively easy to capture in FPDS.

What may be missing from the formal definition is a full understanding of the processes that are regulatorily required to take place at the contracting level prior to the release of a solicitation. The above Table 2 indicates that such processes can take weeks, months, or over a year to complete prior to the release of a solicitation. While a small subset of the ACC-RSA acquisitions was reviewed, the fact that regulations and policy dictate such actions cannot be disputed.

In reference to the PALT for pre-priced task/delivery orders, it has also been shown that not all orders fall within the purview of ordering officers. As discussed with the OMB-OFPP, an assumption was made that most task/delivery orders were issued by ordering officers. The FAR, DFARS, and AFARS have strict restrictions as to when an ordering officer is authorized. The actions reviewed for this research were all awarded by contracting officers, and per Table 6, none of them met the formal definition of PALT. As such, the assumption that pre-priced task/delivery orders can be awarded the same day the requirement is received appears to be inaccurate.

It has further been found that there is no formal definition of the entire acquisition process, from identification of the requirement to award and/or final delivery. As shown in Table 9, there are many steps to be taken by contracting officers between receipt of the completed CRP and award of a contract. While the discussion of the program offices' procedures during the ARLT phase of the overall timeline was not a priority topic in this writing, it has been found that delayed or changed CRP submissions have been identified as a significant factor in contract award delays.

However, as presented in Table 8, most, if not all, policy requirements are only on the contracting offices to award contracts within specified timelines. During that process,

the contracting offices are also required to follow the FAR, DFARS, AFAR and local policy as presented in Table 9. While the 2020 FR post stated “PALT can also create incentives to drive greater efficiencies in the requirements development process, which has long been recognized as one of the most significant sources of delay in the acquisition lifecycle” (Procurement Administrative Lead Time [PALT], 2020, p. 3429), the shorter the PALT is made at the contracting office level, the longer the program offices may take to submit completed CRPs.

There is also very little available research to review regarding contractor delays in the PALT. As the above indicates, contractors can have a significant impact on PALT, yet there are also no repercussions for their delays. The OMB-OFPP interview, as discussed above, also indicated that contractor delays were not considered. However, as indicated in Table 7, contractors can delay award of bilateral task/delivery orders. It is also very clear in Table 11 that the contractor’s proposal submission can be a significant delay in PALT, as well as delayed negotiations as presented in Table 13.

3. Primary Research Recommendations

The first recommendation from this research is for those instilling formal definitions for contracting policy and/or practices first understand the regulatory requirements of the processes required, and more importantly, who is required to perform those requirements. Whether the policy is suggested by congress or may be disruptive/controversial should not override existing regulations. While several of the regulations referenced in Tables 1 and 9 are related to the AFARS or local policy, many others are DOD-level or above. Whether the other DOD agencies follow the same policies as the Army is not the focus of this current research, but it is highly recommended that each, at a minimum, follow the FAR and DFARS prior to releasing a solicitation within their individual PALT timelines. Utilizing the release of the solicitation, even as a draft, does not reflect appropriately to the actions required to be performed by the contracting offices.

It is also highly recommended that the PALT for pre-priced task/delivery orders be reexamined. The current requirement of zero days requires contracting personnel to report

false information in the FPDS-NG system and would be of no assistance to the public or government officials. If such information isn't helpful, it probably shouldn't be reported.

This singular focus on PALT could be viewed as unfair to the contracting offices. There are other entities involved in the PALT process, such as program offices and contractors. As stated above, the Army Audit Agency audit of Army policies and procedures refers to the lack of regulations pertaining to the program offices' timelines. There also appears to be no true consensus if whether ALT ends at contract award or at final delivery, or if ALT even formally exists. As such, it is further recommended that the overarching ALT be identified first before instilling something inappropriate or inaccurate on the contracting offices in the middle of whatever the full process is determined to be.

While not intended to be part of the initial primary research, the fact that contractors have a hand in the overall PALT process came to light. To date, this researcher has been unable to find any way to deter such contractor-instigated delays. There are no known regulations or repercussions for contractors that cause award delays. The only recommendation that can be made at this time is to further research the impact contractors have on PALT and determine a way to make them responsible for such actions.

B. SECONDARY RESEARCH

1. Secondary Research Question

The secondary research question is whether the proposed FPDS-NG tracking mechanism provides accurate and/or sufficient data to indicate where delays in the procurement process occur. The available data for this analysis was limited to the two data points available in the FPDS-NG system, the award date and the solicitation release date. The primary focus of the analysis was on the accuracy of the reported solicitation release dates and the impact on the PALT.

An evaluation of two potential substitutes or supplements for the FPDS-NG database was also conducted. The PCF and PIEE systems were reviewed for the level of data captured and how they are currently used. The intent of this review was to investigate ways to report sufficient information to decipher where delays occur, and where improvements can be made.

2. Secondary Research Findings

As shown in Tables 16 and 17, some significant reporting delays can occur in the FPDS-NG reporting system. While the system may feed from data from the contract writing systems in most cases, even some of that data was found to be unreliable. The solicitation release date can be unintentionally manipulated, or, in the case of pre-priced task/delivery orders, a nonexistent date.

With only two data points reported within the FPDS-NG system, it is also impossible to decipher exactly where delays are occurring throughout the procurement process. A couple of reasons stated for the issuance of a formal definition PALT were:

Establishing a common definition of PALT and a plan for measuring and publicly reporting PALT data are important steps in helping the Federal Government *to understand and better address causes of procurement delays* [emphasis added]. PALT can help to drive continual process improvement and the pursuit of more innovative procurement practices, especially when the data are used in combination with other inputs for evaluating the overall effectiveness of the acquisition process in delivering value to the taxpayer, such as cost and the quality of the contractor's performance. *PALT can also create incentives to drive greater efficiencies in the requirements development process, which has long been recognized as one of the most significant sources of delay in the acquisition lifecycle* [emphasis added]. (Procurement Administrative Lead Time [PALT], 2020, p. 3429).

While the intent of the formal PALT definition is understandable, the reporting of two data points is futile to the concept of understanding where the delays are occurring. Yes, one can see that delays occurred, but the reasoning behind such delays is elusive without reviewing specific contract actions.

Two other existing reporting databases were also reviewed to find a more reliable reporting system. It was found that the PIEE system is capable of reporting at or above the DOD level; however, the reporting is sporadic and not publicly available. The PCF system was utilized throughout this analysis, yet it has even more stringent accessibility requirements, being accessible to Army acquisition professionals only.

3. Secondary Research Recommendations

It is difficult to make a recommendation regarding the tracking mechanism for PALT. This is due to the lack of information provided in the FPDS-NG, and the lack of access to the PIEE and Army PCF systems. However, to meet the goal of understanding where delays in the procurement process exist, it is recommended that further implementation of the PIEE system be investigated. The PIEE system currently allows for government-wide access and contractors already have such access to some aspects of the system, such as Wide Area Workflow for payments. How the public could access such a system is beyond the realm of this research; however, it may be a possibility.

One further observation is the existing Army PCF system. Said system allows for the contracting office to enter specifics as to why the PALT is being delayed. While an Army system is not used across the government, utilizing it as a baseline for a system that can capture such details may be possible. In a perfect world, contracting professionals would enter their data once that is captured not only locally, but as deemed necessary for the federal and public review as well.

VI. CONCLUSION AND AREAS FOR FURTHER RESEARCH

While the analysis consists of a small subset of the total actions performed at ACC-RSA, many issues to the formal definition of PALT came to light. There are specific actions required to be performed by the contracting office prior to release of a solicitation. These actions cannot be performed by the program office. Actions such as the synopsis, DD Form 2579, and peer reviews cannot be performed outside of the contracting office. It is highly recommended that the various FAR, DFARS, and related component regulations be reviewed to ensure consistency and regulatory compliance as is related to PALT. Additional research suggestions include other Army or DOD components to investigate if the ACC-RSA results presented above align with other federal organizations. A full analysis, if possible, may also be warranted to determine the impact of contractor delays in the procurement process.

Another area open for additional research is the finalization of the definitions of ALT and ARLT. Without this full definition, ARLT may continue to be elusive to the program offices, leaving the contracting offices to make up the difference between late CRP submittals, contractor instigated delays, and other unforeseeable delays in the PALT process. While there is, and has been, a significant focus on PALT, the overarching ALT has had little attention, leaving the contracting offices with pressure to make up for delays caused outside of their purview.

As discussed in Chapter IV, it has further been found that the recommended tracking mechanism, FPDS-NG, is unreliable and does not report enough information to make congressional-level decisions regarding acquisition delays. It is recommended that other existing mechanisms be reviewed for possible further implementation. If deemed unlikely, then perhaps a new system can be developed for such purposes. This would be an area of additional research beyond the technical capabilities of this researcher; however, may be of interest to others in their endeavors.

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