

Template DRAFT



2007 Report to Congress
Department of Defense
Panel on
Contracting Integrity

United States Department of Defense
Office of the Under Secretary of Defense for Acquisition,
Technology and Logistics (AT&L)

Executive Summary

Section 813, John Warner National Defense Authorization Act for Fiscal Year 2007 directed the Department of Defense to convene a panel of senior leaders to conduct a Department-wide review of vulnerabilities to fraud, waste, and abuse in contracting integrity, recommend corrective actions, and report to Congress by December 31, 2007. This report is the first of three annual reports to Congress outlining the findings and recommendations of the Panel to foster and monitor contracting integrity across the Department.

Starting in May 2007, the Deputy Under Secretary of Defense (DUSD) for Acquisition Technology and Logistics (AT&L) (Acquisition and Technology) led and facilitated Department-wide efforts. This level of organizational oversight and management provided initial visibility and leadership to focus on key areas of vulnerability and initiate or recommend actions to strengthen contracting integrity.

To date, the Department has established eight DOD-wide subcommittees that support the review of contracting integrity. The subcommittees are: Current Structure of Contract Integrity; Sustained Senior Leadership; Capable Acquisition Workforce; Adequate Pricing; Appropriate Contracting Approaches and Techniques; Sufficient Contract Surveillance; Contracting Integrity in a Combat/Contingent Environment; and Recommendations for Change

Each of the Contracting Integrity Panel subcommittees, at the direction of the leadership, completed a formal report documenting their review of the current status and recommendations to ensure contracting integrity. The Department is taking action to improve the way it ensures contracting integrity. First, organizationally, we have convened the Contracting Integrity Panel and consolidated support for this panel with the development of acquisition and procurement policy. This action will result in a more cohesive and integrated approach.

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Second, strategically, we have set a course to completely reassess the Department's strategic approach to contracting integrity. This involves the examination of the types and kinds of contracting activities and an integrated assessment of how to meet the needs of our warfighters while ensuring that the expenditure of taxpayer funds is wise and effective. The ongoing reassessment includes examination of contracting within the Department or contracts on its behalf by other Federal Agencies, such as GSA and the Department of the Interior.

Upon completion of the reassessment, we will develop an effective plan. We expect the plan to be completed in 2008. The fundamental tenets of our strategy will be straightforward: Ensure that we effectively and efficiently, in terms of both timeliness and cost effectiveness, acquire the services necessary to meet the needs of our warfighters. Underpinning our strategy will be the utilization of contracting tools that ensure competition whenever possible. It is our belief that the use of competition, at all levels, is the most effective tool we have to support contracting integrity.

Third, tactically, we will implement our strategy with straightforward and simple tactical methods: 1) ensure that we clearly identify our requirement, 2) select the most efficient and effective tools, 3) drive consistency and discipline across the Department, and 4) ensure that we have metrics and accountable individuals who will oversee performance.



I. Department of Defense Contracting Integrity Panel

A. Purpose

Section 813, John Warner National Defense Authorization Act for Fiscal Year 2007 directed the Department of Defense to convene a panel of senior leaders representing a cross section of the Department to conduct a Department-wide review of vulnerabilities to fraud, waste, and abuse in contracting integrity, recommend corrective actions, and report to Congress by December 31, 2007 regarding the Panel's findings and actions. This report is the first of three annual reports to Congress outlining the findings and recommendations of the Panel to foster and monitor contracting integrity across the Department.

B. Background

In recent years, the Department of Defense (DOD) has increasingly relied on goods and services provided by the private sector under contract. Since fiscal year 2000, DOD's contracting for goods and services have nearly doubled, and this trend is expected to continue. In fiscal year 2005 alone, DOD obligated nearly \$270 billion on contracts for goods and services to become the largest purchasing organization in the world. Given the magnitude of the dollar amounts involved, it is essential that DOD acquisitions be handled in an efficient, effective, and accountable manner. In other words, DOD needs to ensure that it buys the right things, the right way.

Enacted January 6, 2006, the National Defense Authorization Act for Fiscal Year 2006 required the General Accounting Office (GAO) to review DOD's efforts to identify and assess the vulnerability of its contracts to fraud, waste, and abuse. GAO reviewed the areas of vulnerability that DoD faces with regard to contracting fraud, waste, and abuse, and the recent initiatives that DoD has taken to address these vulnerabilities, including actions DoD has taken in response to a March 2005 Defense Science Board report on management oversight in acquisition organizations.

Starting in May 2007, the Deputy Under Secretary of Defense (DUSD) for Acquisition Technology and Logistics (AT&L) Defense Policy and Procurement led and facilitated Department-wide efforts. This level of organizational oversight and management provided initial visibility and leadership to focus on key areas of vulnerability and initiate or recommend actions to strengthen contracting integrity.

The Director, Defense Procurement and Acquisition Policy (DPAP) in the office of the Deputy Under Secretary of Defense, Acquisition and Technology (DUSD (A&T)) serves as the Panel Executive Director and focal point for procurement policy. This will facilitate the inclusion of policy development, management of the acquisition of services, functional responsibility of procurement systems, and alignment with Military Services and Defense Agencies' senior procurement executive leadership, to integrate principles of integrity within all areas of contracting activity.

C. Current Activities

During 2007, the Contracting Integrity Panel served as the senior governance body within the Department for the review of vulnerabilities to fraud, waste, and abuse in contracting. The dedicated senior-level group conducted a department-wide review of vulnerabilities, previous reviews, and helped to mature the DoD-wide program governance, management, and execution as well.

Section 813, John Warner National Defense Authorization Act for Fiscal Year 2007, specifically called for the establishment of a Panel on Contracting Integrity:



“Establishment-

(1) IN GENERAL- The Secretary of Defense shall establish a panel to be known as the ‘Panel on Contracting Integrity’.

(2) COMPOSITION- The panel shall be composed of the following:

(A) A representative of the Under Secretary of Defense for Acquisition, Technology, and Logistics, who shall be the chairman of the panel.

(B) A representative of the service acquisition executive of each military department.

(C) A representative of the Inspector General of the Department of Defense.

(D) A representative of the Inspector General of each military department.

(E) A representative of each Defense Agency involved with contracting, as determined appropriate by the Secretary of Defense.

(F) Such other representatives as may be determined appropriate by the Secretary of Defense.”

Panel Duties and Functions:

The duties of the panel are set forth in the law as follows:

“(b) Duties- In addition to other matters assigned to it by the Secretary of Defense, the panel shall--

(1) conduct reviews of progress made by the Department of Defense to eliminate areas of vulnerability of the defense contracting system that allow fraud, waste, and abuse to occur;

(2) review the report by the Comptroller General required by section 841 of the National Defense Authorization Act for Fiscal Year 2006 (Public Law 109-163; 119 Stat. 3389), relating to areas of vulnerability of Department of Defense contracts to fraud, waste, and abuse; and

(3) recommend changes in law, regulations, and policy that it determines necessary to eliminate such areas of vulnerability.

(c) Meetings- The panel shall meet as determined necessary by the Secretary of Defense but not less often than once every six months.

(d) Report-

(1) REQUIREMENT- The panel shall prepare and submit to the Secretary of Defense and the congressional defense committees an annual report on its activities. The report shall be submitted not later than December 31 of each year and contain a summary of the panel's findings and recommendations for the year covered by the report.

(2) FIRST REPORT- The first report under this subsection shall be submitted not later than December 31, 2007, and shall contain an examination of the current structure in the Department of Defense for contracting integrity and recommendations for any changes needed to the system of administrative safeguards and disciplinary actions to ensure accountability at the appropriate level for any violations of appropriate standards of behavior in contracting.

(3) INTERIM REPORTS- The panel may submit such interim reports to the congressional defense committees as the Secretary of Defense considers appropriate.

(e) Termination- The panel shall terminate on December 31, 2009.”

The Contracting Integrity Panel leveraged the research and recommendations the recent GAO report, contract Management: DOD Vulnerabilities to Contracting Fraud, Waste, and Abuse” (GAO-838R), and the recommendations of the Report of the Defense Science Board Task Force on Management Oversight in Acquisition Organizations., DODIG findings, and recommendations of the Procurement Fraud Working Group to provide material to focus on its five core objectives and work to align these concepts throughout the Department through improved governance, communication, and policy.

Goals and Objectives

The five core objectives reflect the Department’s commitment to contracting integrity and continued desire to realize cost reductions and process efficiencies while meeting socio-economic goals.

They include correcting the following weaknesses identified by the GAO report in five key areas:

- ▶ Sustained senior leadership



- ▶ Capable contracting workforce
- ▶ Adequate pricing
- ▶ Appropriate contracting approaches and techniques
- ▶ Sufficient contract surveillance

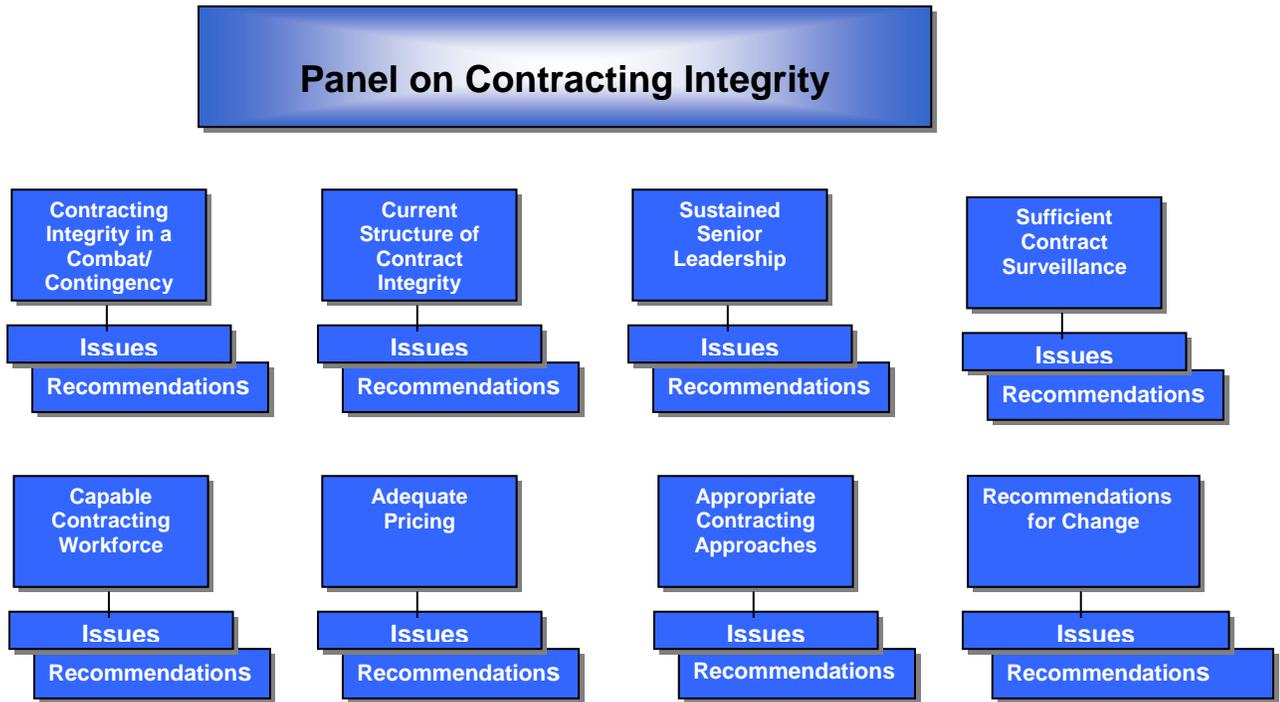
Senior Contracting Leadership Offsite:

On May 10, 2007, the Director, DPAP, conducted an offsite for senior leaders of the contracting community. One of the focal points of the offsite was a discussion to highlight current issues relating to ethics in contracting and ensure that the leadership of the DoD Contracting Community was fully engaged in the activities of the Panel on Contracting Integrity.

Governance

The contracting integrity leaders oversee the DOD contracting policies and initiatives. As depicted in Figure 1, the panel interfaces with other governance bodies as needed to align contracting integrity efforts across the Department.

Figure 1



The Department’s governance structure enables decision-making and oversight through the Contracting Integrity Panel. In addition, panel meetings serve as a forum to align efforts and share successes, experiences and lessons learned. The panel consists of thought leaders from areas critical to contracting such as the Office of the General Counsel and the DOD Inspector General (DODIG). The panel includes representatives from each Military Service (Air Force, Army, Navy, and Marine Corps); combatant commands key to contracting such as US Transportation Command (USTRANSCOM) and US Special Operations Command (SOCOM); along with several key defense agencies: Defense Logistics Agency (DLA), the Defense Contract Audit Agency, Defense Contract Management Agency (DCMA), and. The Contracting Integrity Panel met {three} times in FY2007.



Contracting Integrity Panel Membership

Name	Organization	Email Address
Hon Dr. James Finley, Chair	OUSD (AT&L)	James.Finley@osd.mil
Mr. Shay Assad, Executive Director	OUSD (AT&L)	Shay.Assad@osd.mil
Ms. Tina Ballard	Department of the Army	tina.ballard@us.army.mil
Mr. Michael Jaggard	Department of the Navy	michael.jaggard@navy.mil
Mr. Charlie Williams	Department of the Air Force	charlie.williams@pentagon.af.mil
Mr. William Reed	Defense Contract Audit Agency	william.reed@dcaa.mil
Mr. Frank Anderson, Jr.	Defense Acquisition University	frank.anderson@dau.mil
Ms. Scottie Knott	Defense Logistics Agency	claudia.knott@dla.mil
Mr. Doug Larsen	Office of the General Counsel, DoD	larsend@dodgc.osd.mil
Mr. Richard Ginman	OUSD(AT&L)	richard.ginman@osd.mil
Dr. Dale Uhler	Special Operations Command (SOCOM)	uhlerd@socom.mil
Mr. Steven Shaw	Department of the Air Force	steven.shaw@pentagon.af.mil
Mr. Barney Klehman	Missile Defense Agency (MDA)	barney.klehman@mda.mil
Mr. Mark Wilkoff	Department of the Navy (OGC)	mark.wilkoff@navy.mil
Mr. Nicholas Retson	Defense Contract Management Agency (DCMA)	nicholas.retson@dcma.mil
Mr. Richard Jolliffe	DoD Inspector General (DODIG)	richard.jolliffe@dodig.mil
Mr. Ronald Kurjanowicz	Department of Defense Advanced Research Projects Agency (DARPA)	Ron.Kurjanowicz@darpa.mil
Ms. Tonya M. Crawford	National Geospatial Agency (NGA)	Tonya.M.Crawford@nga.mil
Ms. Lorraine Allison	Department of Defense Education Activity (DODEA)	Lorraine.Allison@hq.dodea.edu
Ms. Gail Jorgenson	US Transportation Command (TRANSCOM)	ustc-tcaq@ustranscom.mil
Mr. Daniel Gilliam	National Security Agency (NSA)	dcgilli@nsa.gov
Ms. Evelyn DePalma	Defense Information Systems Agency (DISA)	evelyn.depalma@disa.mil
Ms. Jean Storck	ASD(HA) TRICARE Management Agency (TMA)	jean.storck@tma.osd.mil



Subcommittees

To date, the Department has established seven DOD-wide subcommittees that support the review of contracting integrity. The subcommittees are:

- Current Structure of Contract Integrity;
- Sustained Senior Leadership;
- Capable Contracting Workforce;
- Adequate Pricing;
- Appropriate Contracting Approaches and Techniques;
- Sufficient Contract Surveillance;
- Contracting Integrity in a Combat/Contingent Environment; and
- Recommendations for Change

AT&L provided oversight during the reporting year and worked with the subcommittees to spur development and formalize reporting of current activities to Congress. The leads of each of the above initiatives currently participate in the Contracting Integrity Panel to exert their leadership in the procurement community, provide insights and lessons learned, and recommend improvements to DOD leadership that will be actionable and significant. The subcommittees' knowledge-sharing activity is a significant factor in the impact and success of future efforts at the Department-wide level.

Each of the Contracting Integrity Panel subcommittees, at the direction of the leadership, will complete a formal report documenting their review of the current status and recommendations to ensure contracting integrity. The reporting templates provide a comprehensive view of the strategic sourcing activities of each of the primary organizations within DOD in a consistent format. These individual reports are located in Section II of this report. Points of contact for subcommittee members include:

Current Structure of Contract Integrity

Subcommittee Lead: Ms Scottie Knott; subcommittee members: Ms Gail Jorgenson, Ms Tonya Crawford
This subcommittee examined how the organizational structure supports contracting integrity and whether that offered opportunities for improvement. Oversight and management of DOD contracting activities is shared among numerous organizations. The primary organizations are the Office of the Under Secretary of Defense for Acquisition, Technology, and Logistics (AT&L), the DOD Office of General Counsel, DOD Inspector General (DOD IG), the Defense Criminal Investigative Service, the Defense Contract Audit Agency, and the audit agencies, criminal investigation services, and offices of general counsel of the military departments.

Sustained Senior Leadership

Subcommittee Lead: Ms Tina Ballard; subcommittee members: Mr. Mark W. Wilkoff, Mr. Ron Kurjanowicz.
This subcommittee reviewed vulnerabilities in aspects of its senior leadership due to certain disconnects, including senior positions that have remained unfilled for long periods of time, the acquisition culture fostered by management's tone at the top, and the management approach used in new industry partnering relationships. This initiative provided several recommendations to prevent an environment presenting opportunities for determined individuals to circumvent established policies and procedures or otherwise fail to act in the government's best interest.

Capable Contracting Workforce

Subcommittee Lead: Mr. Frank Anderson; subcommittee members: Lorraine Allison, Ms Evelyn DePalma
DOD needs to have the right skills in its contracting workforce to implement best practices and properly manage the acquisition of goods and services. Effective workforce skills are essential for ensuring that DOD receives fair and reasonable prices for the goods and services it buys. The size of the contracting workforce has remained relatively constant since fiscal year 2000. However, overall contract obligations and the number of contract actions processed by DOD have increased nearly twofold. The steadily increasing workload of the



contracting workforce limits time for education and training and jeopardizes the currency and development of their skills. The Department established the Workforce Competency Initiative and Capabilities Assessment to ascertain and quantify the skills required in the evolving contracting arena. The Capable Contracting Workforce subcommittee benefited from this research and from the significant work in the DOD plan “Strategic Management of Human Capital of the Acquisition, Technology, and Logistics Workforce.” This group worked in concert with the Defense Acquisition University and the Acquisition community to develop a coordinated approach for training and developing a highly ethical cadre of professionals to conduct and oversee the Department’s contracting.

Adequate Pricing

Subcommittee Lead: Mr. William Reed; subcommittee members: Mr. Shay Assad, Mr. Richard Joliffe
The Federal Acquisition Regulation provides procedures for making price determinations, but DOD faces vulnerabilities because of the unusual range and complexity of its acquisition activities. The Department established the Cost, Price, and Finance policy office to unify policy guidance and strengthen internal management and controls in this area. The Adequate Pricing subcommittee reviewed various risks associated with obtaining adequate contract pricing that can lead to vulnerabilities. These include non-competitive contract actions; delays in setting requirements for undefinitized contracts; failure to use available pricing information for sole source awards; and misclassification of items as commercial items. The subcommittee recommended clarification of waiver procedures and documentation and establishment of approval levels for waivers. They reviewed recommendations with respect to undefinitized contracts and recommended specific policy guidance, training, and reporting requirements to monitor progress. To prevent future failure to use available pricing information for sole source awards, the subcommittee recommended a variety of management controls and execution. Finally, the subcommittee recommended establishment of a dollar threshold for approval of commerciality of an item and a governance body to prevent future misuse.

Appropriate Contracting Approaches and Techniques

Subcommittee Lead: Mr. Charlie Williams; subcommittee members: Mr. Dale Uhler, Mr. Barney Klehman.
The Department recognized that the growth in the dollar value of contracts and the increasing complexity of contracts have created unintended consequences. AT&L issued policy memos on the proper use of non-DoD contracts, and use of award and incentive fees. It has placed greater oversight regarding interagency contracts and signed a memorandum of understanding with the General Services Administration to address concerns of interagency contracting. DOD Acquisition representatives have met with the Department of Interior representatives to implement similar controls on the use of interagency contracts.

Sufficient Contract Surveillance

Subcommittee Lead: Mr. Mike Jaggard; subcommittee members: Mr. Daniel Gilliam, Ms. Jean Storck.
“You get what you inspect” is the watchword of contract surveillance to ensure that contracted goods and services are delivered according to the schedule, cost, quality, and quantity specified. The Department risks paying contractors more than the value of the goods and services provided if surveillance is insufficient, not conducted, or undocumented. Arduous or crisis conditions and increasing workload serve to create contract surveillance vulnerabilities in DOD. This subcommittee explored means to ensure that the government receives everything for which it has contracted.

Contracting Integrity in a Combat/Contingent Environment

Subcommittee Lead: Mr. Shay Assad; Co-lead: Mr. Richard Ginman; subcommittee members: Ms. Tina Ballard, RADM Kathleen Dussault, Mr. Charlie Williams, and Mr. Keith Ernst. Contracting integrity is tested in a combat/contingent environment, and recent contracting for Iraq and Katrina have highlighted the need for improvement. This subcommittee reviewed lessons learned and recommended methods to improve the Department’s ability to maintain contracting integrity and use internal controls while responding to needs in a crisis.



Recommendations for Change

Subcommittee Lead: Mr. Doug Larsen; subcommittee members: Mr. Steve Shaw, Mr. Nicolas Retson.

This subcommittee developed a methodology and conducted an independent review of the recommendations from the other subcommittees. Their recommendations represent a consensus regarding the most actionable and needed recommendations.

Procurement Fraud Working Group

The Department established the DoD-wide Procurement Fraud Working Group in January 2005. The Working Group provides a forum for acquisition professionals to address contracting vulnerabilities. The Working Group began to conduct conferences in March 2005, and has conducted them annually since that time. The conferences provide an opportunity for sharing of best practices among acquisition professionals, and include group discussions, exercises in ethics problem solving and arriving at practical solutions to the contracting ethics problems encountered in the field. Membership and attendance includes primarily DoD attorneys, investigators and auditors. The Working Group meets monthly and attends the Department of Justice Procurement Fraud Task Force meetings. A current goal of the Working Group is to obtain broader participation by the larger acquisition community.

Ethics Regulations and Policy Training

The Department has initiated several changes to the Federal Acquisition Regulation (FAR) to update the acquisition regulations pertaining to ethics in contracting. The Defense Acquisition Regulations (DAR) Council, in concert with Civilian Agency Acquisition Council, proposed an amendment to the FAR to address a Contractor Code of Ethics and Business Conduct and a requirement for contractors, and subcontractors, participating in contracts over a certain dollar threshold to post an Office of the Inspector General Fraud Hotline poster. The Councils published a proposed rule in February to obtain public comments, and the FAR Secretariat anticipates publication of a final rule by November 2007.

In addition, the DAR Council has initiated a proposed FAR revision to require contractors to establish and maintain internal controls to detect and prevent fraud in their contracts, and to notify contracting officers without delay whenever they become aware of contract fraud. This is a proposed revision that is still under consideration and development, and has not been published.

DOD will continue to work with the Office of Federal Procurement Policy to recommend changes to laws, regulations, and policy that would serve to clarify or strengthen issues identified through the work of the Panel on Contracting Integrity.

The DoD Standards of Conduct Office updates the mandatory annual ethics training yearly to ensure that it is always current and relevant. The latest revisions, issued August 24, 2007, modify the curriculum to focus beyond a rote understanding of the law, regulations, and policy so that the updated version now contains presentations by the Office of General Counsel and interactive decision making exercises. The Department also provides on-line the "Employee's Guide to the Standards of Conduct."

Coordination with Federal Activities

The Department of Defense will continue to work with the Office of Federal Procurement Policy to recommend changes to laws, regulations, and policy that would serve to clarify or strengthen issues identified through the work of the Panel on Contracting Integrity.



D. Next Steps – Take Action

The Department is taking action to improve the way it ensures contracting integrity. First, organizationally, we have convened the Contracting Integrity Panel and consolidated support for this panel with the development of acquisition and procurement policy. This action will result in a more cohesive and integrated approach.

Second, strategically, we have set a course to completely reassess the Department's strategic approach to contracting integrity. This involves the examination of the types and kinds of contracting activities and an integrated assessment of how to meet the needs of our warfighters while ensuring that the expenditure of taxpayer funds is wise and effective. The ongoing reassessment includes examination of contracting within the Department or contracts on its behalf by other Federal Agencies to include: NASA, the General Services Administration (GSA), the Department of the Interior, the Department of the Treasury, the National Institute of Health (NIH), and the Veteran's Administration (VA).

Upon completion of the reassessment, we will develop an effective plan. We expect the plan to be completed in 2008. The fundamental tenets of our strategy will be straightforward: Ensure that we effectively and efficiently, in terms of both timeliness and cost effectiveness, acquire the services necessary to meet the needs of our warfighters. Underpinning our strategy will be the utilization of contracting tools that ensure competition whenever possible.

We will balance our goal to find areas where combined buying power will result in savings with our responsibilities to fulfill the socioeconomic goals of the Department. It is our belief that the use of competition, at all levels, is the most effective tool we have to support contracting integrity.

Third, tactically, we will implement our strategy with straightforward and simple tactical methods: 1) ensure that we clearly identify our requirement, 2) select the most efficient and effective tools, 3) drive consistency and discipline across the Department, and 4) ensure that we have metrics and accountable individuals who will oversee performance.

Questions

Direct any questions regarding this report to Mr. Shay Assad at Shay.Assad@osd.mil.





II. Military Service and Agency Strategic Sourcing

A. Current Structure of Contract Integrity

Insert Current Structure of Contract Integrity Submission

B. Sustained Senior Leadership

Insert Sustained Senior Leadership Submission

C. Capable Acquisition Workforce

Insert Capable Acquisition Workforce Submission

D. Adequate Pricing

Insert Adequate Pricing Submission

E. Appropriate Contracting Approaches and Techniques

Insert Appropriate Contracting Approaches and Techniques Submission

F. Sufficient Contract Surveillance

Insert Sufficient Contract Surveillance Submission

G. Recommendations for Change

Insert Recommendations for Change Submission





Current Structure of Contract Integrity Subcommittee

2007 Annual Report on Contract Integrity

Executive Summary

Contracting Vulnerability:

Related GAO or IG Reports

GAO Recommendations

DoD Follow up Actions to Date or Pending Plans

Gaps Identified by Subcommittee

Subcommittee Recommendations

Conclusion





Sustained Senior Leadership Subcommittee

2007 Annual Report on Contract Integrity

(Note: Contracting vulnerabilities are those cited in the GAO report for each issue)

Executive Summary

Contracting Vulnerability: Unfilled Positions

Related GAO or IG Reports

GAO Recommendations

DoD Follow up Actions to Date or Pending Plans

Gaps Identified by Subcommittee

Subcommittee Recommendations

Contracting Vulnerability: Tone at the Top

Related GAO or IG Reports

GAO Recommendations

DoD Follow up Actions to Date or Pending Plans

Gaps Identified by Subcommittee

Subcommittee Recommendations





Contracting Vulnerability: Lead Systems Integrator (LSI)

Related GAO or IG Reports

GAO Recommendations

DoD Follow up Actions to Date or Pending Plans

Gaps Identified by Subcommittee

Subcommittee Recommendations

Conclusion





Capable Acquisition Workforce Subcommittee

2007 Annual Report on Contract Integrity

(Note: Contracting vulnerabilities are those cited in the GAO report for each issue.)

Executive Summary

Contracting Vulnerability: Skill Levels For New Contract Approaches

Related GAO or IG Reports

GAO Recommendations

DoD Follow up Actions to Date or Pending Plans

Gaps Identified by Subcommittee

Subcommittee Recommendations

Contracting Vulnerability: Large Number Of Retirement-Eligible Staff

Related GAO or IG Reports

GAO Recommendations

DoD Follow up Actions to Date or Pending Plans

Gaps Identified by Subcommittee

Subcommittee Recommendations

Conclusion





Adequate Pricing Subcommittee

2007 Annual Report on Contract Integrity

(Note: Contracting vulnerabilities are those cited in the GAO report for each issue.)

Executive Summary

Contracting Vulnerability: Non-competitive Contract Actions

Related GAO or IG Reports

GAO Recommendations

DoD Follow up Actions to Date or Pending Plans

Gaps Identified by Subcommittee

Subcommittee Recommendations

Contracting Vulnerability: Delays in Setting Requirements for Undefined Contracts

Related GAO or IG Reports

GAO Recommendations

DoD Follow up Actions to Date or Pending Plans

Gaps Identified by Subcommittee

Subcommittee Recommendations

Contracting Vulnerability: Failure to Use Available Pricing Information for Sole Source Awards

Related GAO or IG Reports

GAO Recommendations

DoD Follow up Actions to Date or Pending Plans

Gaps Identified by Subcommittee

Subcommittee Recommendations





Contracting Vulnerability: Misclassification of Items as Commercial Items

Related GAO or IG Reports

GAO Recommendations

DoD Follow up Actions to Date or Pending Plans

Gaps Identified by Subcommittee

Subcommittee Recommendations

Conclusion



Appropriate Contracting Approaches

2007 Annual Report on Contract Integrity

(Note: Contracting vulnerabilities are those cited in the GAO report for each issue.)

Executive Summary

Contracting Vulnerability: Interagency Contracting

Related GAO or IG Reports

GAO Recommendations

DoD Follow up Actions to Date or Pending Plans

Gaps Identified by Subcommittee

Subcommittee Recommendations

Contracting Vulnerability: Use of GSA Multiple Award Schedules

Related GAO or IG Reports

GAO Recommendations

DoD Follow up Actions to Date or Pending Plans

Gaps Identified by Subcommittee

Subcommittee Recommendations





Contracting Vulnerability: Structure and Implementation of Award and Incentive Fees

Related GAO or IG Reports

GAO Recommendations

DoD Follow up Actions to Date or Pending Plans

Gaps Identified by Subcommittee

Subcommittee Recommendations





Sufficient Contract Surveillance Subcommittee

2007 Annual Report on Contract Integrity

(Note: Contracting vulnerabilities are those cited in the GAO report for each issue.)

Executive Summary

Contracting Vulnerability: Contract Surveillance Training

Related GAO or IG Reports

GAO Recommendations

DoD Follow up Actions to Date or Pending Plans

Gaps Identified by Subcommittee

Subcommittee Recommendations

Contracting Vulnerability: Assignment of Personnel Before Surveillance Period Begins

Related GAO or IG Reports

GAO Recommendations

DoD Follow up Actions to Date or Pending Plans

Gaps Identified by Subcommittee

Subcommittee Recommendations





Contracting Vulnerability: Accountability for Surveillance Duties

Related GAO or IG Reports

GAO Recommendations

DoD Follow up Actions to Date or Pending Plans

Gaps Identified by Subcommittee

Subcommittee Recommendations

Contracting Vulnerability: Performing And Documenting Surveillance

Related GAO or IG Reports

GAO Recommendations

DoD Follow up Actions to Date or Pending Plans

Gaps Identified by Subcommittee

Subcommittee Recommendations

Conclusion



Contracting Integrity in an Contingency Environment Subcommittee

2007 Annual Report on Contract Integrity

(Note: Contracting vulnerabilities are those cited in the GAO report for each issue.)

Executive Summary

Contracting Vulnerability: Issues in International Contracting

Related GAO or IG Reports

GAO Recommendations

DoD Follow up Actions to Date or Pending Plans

Gaps Identified by Subcommittee

Subcommittee Recommendations

Contracting Vulnerability: Issues in Emergency Contracting

Related GAO or IG Reports

GAO Recommendations

DoD Follow up Actions to Date or Pending Plans

Gaps Identified by Subcommittee

Subcommittee Recommendations



Recommendations for Change Subcommittee

2007 Annual Report on Contract Integrity

Executive Summary

Methodology

Analysis

Prioritized Recommendations: (one from each subcommittee)

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.

