MEMORANDUM FOR: SEE DISTRIBUTION

SUBJECT: Past Performance Assessment Reporting

Recent hearings conducted by congressional committees and the Commission on Wartime Contracting, audits by the Government Accountability Office, and reviews by the Department of Defense Inspector General’s office have identified the importance of past performance information.

The Federal Acquisition Regulation (FAR) states that contracts shall be awarded to responsible prospective contractors only; past performance information is critical to that determination. The Department of Defense (DoD) relies on past performance assessment data in the Past Performance Information Retrieval System (PPIRS), reported via the Contractor Performance Assessment Reporting System (CPARS), when determining if contractors are responsible. It is critical that the Department have accurate and up-to-date assessment information about contractors.

CPARS reporting is the shared responsibility of program/requirements offices and contracting personnel. Program or requirements offices are required to complete performance assessments within 120 days of the end of an evaluation period. Not only is it important to complete assessments, they should be done in a timely manner and with quality narratives for each rated element, to include schedule and cost considerations. Each rating must include supporting narrative in sufficient detail to assist future source selection officials in determining relevance to the new procurement action. It is important to address the complexity of the contract effort and the overall technical risk as these are significant factors and must be considered by source selection officials. Assessments must be supported by objective data or subjective observations on the contractor’s conformance to contract requirements, specifications, and standards of good workmanship, and must always include an assessment of the contractor’s efforts in controlling cost.

A recent Office of Federal Procurement Policy review of all Federal agencies identified the Department as having completed performance assessments for only 50 percent of the contracts meeting the reporting thresholds in FY 2009. We can do better. Due to the volume of DoD contracts, the Department issued class deviation 2011-00014 and established thresholds (see Table 1 in the CPARS guide) for input of contractor performance assessments that are higher than the simplified acquisition threshold identified in the FAR. Assessments must be completed for 100 percent of those contracts meeting or exceeding the DoD threshold.

A review of the compliance metrics in PPIRS as of October 3, 2011, is attached. It identifies the Department’s statistics in percentage of completed performance assessments for CPARS, to include data from the two CPARS modules: the Construction Contractor Appraisal
Support System and the Architect-Engineer Contract Administration Support System. The overall average for 2008-2010 in the Department is 56 percent.

To prevent lapses in CPARS reporting due to personnel turnover, the Government official responsible for input of contractor performance assessments must initiate a report in CPARS prior to leaving the position. Information can be left in a draft status for the person that will be subsequently responsible for the action. Performance appraisals of persons responsible for preparing contractor performance assessments in CPARS should note compliance with timely input of the assessments with meaningful information.

Training for all persons responsible for the preparation and review of performance assessments is available online (www.cpars.csd.disa.mil). Students may register for online or onsite training. Information on past performance is also available in Defense Acquisition University course CLC 028.

Component Focal Points must apprise their respective senior acquisition command officials on the organization’s performance in complying with the requirement for timely and quality contractor performance assessments. Program management review teams and the procurement performance management assessment program must include verification that contractor performance assessments are being completed. The Director, Defense Procurement and Acquisition Policy (DPAP), will monitor and communicate compliance information to the senior procurement executives on a quarterly basis. My point of contact is Ms. Sandra Ross, DPAP, at 703-695-9774.

Frank Kendall
Acting

Attachment:
As stated
DISTRIBUTION:
SECRETARIES OF THE MILITARY DEPARTMENTS
CHAIRMAN OF THE JOINT CHIEFS OF STAFF
UNDER SECRETARIES OF DEFENSE
DEPUTY CHIEF MANAGEMENT OFFICER
COMMANDERS OF THE COMBATANT COMMANDS
DIRECTOR, COST ASSESSMENT AND PROGRAM EVALUATION
DIRECTOR, OPERATIONAL TEST AND EVALUATION
GENERAL COUNSEL OF THE DEPARTMENT OF DEFENSE
INSPECTOR GENERAL OF THE DEPARTMENT OF DEFENSE
ASSISTANT SECRETARIES OF DEFENSE
DEPARTMENT OF DEFENSE CHIEF INFORMATION OFFICER
ASSISTANTS TO THE SECRETARY OF DEFENSE
DIRECTOR, ADMINISTRATION AND MANAGEMENT
DIRECTOR, NET ASSESSMENT
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| Total       | 13890               | 9155                   | 66%             | 21489                | 11346                 | 53%             | 4684                 | 1940                 | 41%             | 40050               | 22440                 | 56%                |

As of 3 October 2011
* Contract Count = Contracts meeting the CPARS Thresholds
** Completed Count = Assessments Reports Completed