

U.S. Environmental Protection Agency FY 2014 Service Contract Inventory Analysis Plan

U. S. Environmental Protection Agency
Office of Acquisition Management

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The Environmental Protection Agency (EPA) Fiscal Year 2014 analysis will be performed in accordance with the criteria set out in Consolidated Appropriations Act, 2010, (Pub. L. No. 111-117, § 743 (2009)), Appendix D of the November 5, 2010 OMB Memorandum on Service Contract Inventories, and the December 19, 2011 OMB Memorandum on Service Contract Inventories.

For FY 2014 analysis, EPA will review the 12 special interest PSCs that were designated to have the greatest potential for vulnerability. In addition, EPA will select contracts with the greatest obligated contract dollar and the type of work involved as an initial indicator of risk. The 12 special interest PSCs are outlined in the table below:

PSC	Description	Total Value 2014
R499	Other Professional Services	\$197,402,922
C211	A/E Svcs. (incl. landscaping interior)	\$100,340,813
F999	Other Environmental Assessments	\$ 81,535,083
R425	Engineering and Technical Services	\$ 46,379,514
D399	Other ADP & Telecommunications Services	\$ 42,695,876
R408	Program Management/Support Services	\$ 41,022,364
C214	A&E Management Engineering Services	\$ 36,583,474
D308	Program Services	\$ 22,102,281
B510	Study/Environmental Assessments	\$ 18,169,609
R799	Other Management Support Services	\$ 13,305,027
D302	IT and Telecom – Systems Development	\$ 7,450,934
D314	IT and Telecom – Systems Acquisition Support	\$ 3,684,446

EPA will approach its analysis using the following method:

- Step 1: Consolidate the data described above.
- Step 2: Crosswalk the data with EPA's contractor inventory and FPDS data.
- Step 3: Evaluate the data in accordance with Agency and Federal policy and guidance.
- Step 4: Develop criteria to identify individual contracts for in-depth review.

Based on the criteria identified and in accordance with the Consolidated Appropriations Act, EPA will select individual contracts for detailed review in the following order:

- Tier 1: Potential for inherently governmental performance by contractors;
- Tier 2: Contracts providing professional and management services or information technology services;
- Tier 3: Contracts that do *not* include professional and management services or information technology services, but were awarded on a non-competitive basis; and

Tier 4: Contracts that do *not* include professional and management services or information technology services, but meet any one of the remaining designated criteria.

To perform its analysis EPA will contact the cognizant contracting officers and contracting officer representatives to gain access to the contracts and related documents as well as to gather information via survey, in-person interviews, and reviews of task orders, invoices, deliverables, and facilities, as appropriate.

Beginning with FY 2014 inventory, EPA must include a supplement with information collected from contractors on the amounts invoiced and the direct labor hours expended on covered service contracts. The Federal Acquisition Regulation (FAR) Subpart 4.17 addresses the collection of this information. The new requirement for FY15 is not in our FY14 plan because OMB has yet to provide agencies with all the comprehensive changes.

The Senior Agency Management Official who is accountable for the development of agency policies, procedures, and training associated with OFPP Policy Letter 11-01 addressing the performance of inherently governmental and critical functions (this designation is already required by section 5-4(e) of the Policy Letter) is Thomas Dussault, Director of Policy, Training, and Oversight Division.

The Senior Agency Management Official who is responsible for ensuring appropriate internal management attention is given to the development and analysis of service contract inventories is John Bashista, Senior Procurement Executive.

The individual who can serve on the work group is Linear Cherry, Financial Analysis and Oversight Service Center, email: cherry.linear@epa.gov: (202) 564-4403.