
Review of the Selection and Award Process
of Metaformers Contract FQ-12208

Final Report



Information Technology No. 13-003
June 18, 2013

Washington Metropolitan Area Transit Authority
Office of Inspector General

M E M O R A N D U M



FINAL AUDIT REPORT WITH RECOMENDATIONS

Information Technology No. 13-003

SUBJECT: Review of the Selection and
Award Process of Metaformers
Contract FQ-12208

DATE: June 18, 2013

FROM: OIG – Helen Lew /S/

TO: DGMA/CFO – Carol Kissal

This **Final Audit Report**, entitled *Review of the Selection and Award Process of Metaformers Contract FQ-12208*, presents the results of our audit. The objective of the audit was to determine whether adequate controls were in place to ensure the Washington Metropolitan Area Transit Authority (WMATA) was following policies and procedures during the vendor selection/award process for contract FQ-12208. The audit focused on Contract FQ-12208 during the period June 2012 through November 2012.

Background

In June 2012, WMATA awarded a contract (FQ-12208) to Metaformers for about \$2.5 million for additional information technology (IT) support and services for the PeopleSoft Financials System. According to the contract statement of work (SOW), the objective was "... to ensure that the users of the PeopleSoft Financials System have the necessary support to complete time-sensitive year-end close activities and audits beginning in July 2012. The larger goal is to provide the users with additional knowledge to improve their uses of the eProcurement/Purchasing, General Ledger, Project Costing, and Contract, Asset Management and Inventory modules. This will promote an overall improvement in Metro's financial business processes as well as valuable support for Metro's BUS and Rail operations." The contract was funded with mostly federal funds.

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Previous Contracts with Metaformers - In 2009, WMATA contracted with Metaformers under contract ES-9204 to conduct an assessment of the current state of the PeopleSoft Financial and Supply Chain Management System. In July 2010, WMATA awarded Metaformers a \$9,147,466, firm fixed-price, 24-month base period contract (ES-10158) for PeopleSoft implementation services (PeopleSoft Integrated Finance Organization (IFO) Project).

The IFO project consisted of integrating WMATA's existing financial systems and functional business processes to accomplish WMATA's strategic objective of establishing a single enterprise-wide information system. It was an upgrade of the legacy financial system, PeopleSoft 8.8 to 9.1. This upgrade created major business process changes in all areas within the Finance organization, specifically, in Accounting, Procurement, Budget, and Treasury, as well as within the projects, and re-defined how staff in those areas performed their job functions using the system. New functionality was introduced in the areas of Customer Grants and Project Costing; and automation was implemented in previously manual functions, such as Asset Management, the interfaces to MAXIMO,¹ and inventory management at the Metro Supply Facility in the main warehouse. WMATA modified the base contract (ES-10158) seven times to either amend a contract provision or exercise a contract task. The cost of this contract was about \$14 million.

Previous Audit Reports issued on Metaformers contracts - The Office of Inspector General (OIG) issued two previous audit reports, entitled *Review of Selection and Award Process of Metaformers Contracts* (IT No. 13-001) in September 2012, and *Review of the Integrated Finance Organization Project* (IT No. 13-002) in November 2012. Both audit reports identified issues relating to the failure to follow applicable WMATA procurement policies and procedures,

¹ MAXIMO is WMATA's maintenance and inventory tracking system that is being integrated with PeopleSoft's 9.1 Inventory Module.

guidance, and regulations in the selection and award process. In addition, OIG found that Metaformers did not adequately meet some key terms and conditions of the contract, and WMATA did not adequately follow systems development life cycle and project management methodologies.

Audit Results

WMATA did not properly follow its Procurement Procedures Manual (PPM) and Policy Memorandum in the selection and award process for contract FQ-12208 to Metaformers and lacks policy for time periods for publicizing a request for proposal (RFP). Specifically, WMATA did not (1) justify the use of a labor-hour contract, (2) provide sufficient time for potential offerors to respond to the request for RFP, and (3) properly document the procurement record after removing an evaluation factor.

To address the findings, we made three recommendations to the Deputy General Manager Administration/Chief Financial Officer (DGMA/CFO) to (1) Direct the Chief Procurement Officer (CPO) to ensure the Office of Procurement and Materials (PRMT) personnel adhere to WMATA's policy memorandum for time and labor contracts, (2) Direct the CPO to define the time period for publicizing the solicitation for RFP and include the time period in the PPM, and (3) Direct the CPO to ensure PRMT personnel adhere to the PPM in the vendor selection and award process as it relates to changes in Authority Requirements.

We provided a draft of this report to the DGMA/CFO for review and comment on June 5, 2013. In the DGMA/CFO's June 12, 2013, response, to a draft of this report, Management agreed with Findings 1 and 3 and the associated recommendations. Management also provided information on corrective actions taken or planned.

Management disagreed with Finding 2. Management stated the procurement was a GSA only procurement which had previously gone through a competitive procurement process as per the GSA Schedule Contracts instructions. The GSA is silent as to the required amount of time to publish for response from proposers on the GSA schedules, and there is no written time frame required by GSA or WMATA's PPM for GSA offerors to respond to the RFP solicitation. However, based on the recommendation from OIG, the CPO will consider the time frame allocated for response on all GSA RFPs in the future in order to ensure reasonableness in the response requirements for the solicitation. The complete text of the DGMA/CFO response is included as Attachment 1 to this report.

The corrective actions taken or planned by Management should address OIG's recommendations, if properly implemented.

Finding – 1 WMATA did not justify the use of a labor-hour contract

WMATA did not follow the PPM in awarding a labor-hour contract (FQ-12208) to Metaformers. The Office of Procurement and Materials (PRMT) awarded a "labor-hour contract" without ensuring the Contracting Officer (CO) determined in writing that no other contracting vehicle was suitable for the award.

According to PPM, § 1212.1 *Time-and-Materials (T&M) Contracts*² and PPM § 1213 *Labor-Hour Contracts*,³ a time-and-materials contract may be used only after the CO determines in writing that no other type of contract is suitable, and only if the contract includes a ceiling price that the contractor exceeds at its own risk. PPM § 1213.1 states when materials are not required, the CO may use a labor-hour contract, a variation of the time-and-materials contract. However, PPM

² Time-and-materials contract - a type of contract that provides for the procurement of supplies or services on the basis of direct labor hours at specified fixed hourly rates (which include wages, overhead general and administrative expenses, and profit) and material at cost.

³ Labor-hour contract - a contract that is a variant of the time-and-materials type contract differing only in that materials are not supplied by the contractor.

§ 1213.2 states the use of a labor-hour contract shall be in accordance with the provisions of PPM §1212.

According to WMATA Policy Memorandum 09-08 under the Policy section, it states, "T&M and Labor Hour contracts are valid contracting vehicles which may be used only under the following circumstances: (1) when there is a provision in the contract; (2) when it is not possible at the time of executing the contract to define the scope of work or duration of the work or to anticipate costs with any reasonable degree of confidence; and (3) only after the Contracting Officer determines in writing that no other type of contract is suitable, and establishes a not to exceed amount and only if the contract includes a ceiling price that the contractor exceeds at its own risk." For the Labor Hour contracts, the Program Office shall prepare a Determination and Findings⁴ (D&F) that no other type of contract is suitable for this procurement action. This D&F shall be signed by the Contract Administrator, approved one level above the Contract Administrator, and reviewed by the General Counsel.

The CO did not determine in writing, that no other type of contracting vehicle was suitable. The Contract Administrator (CA) did not ensure a D&F was prepared and included in the contract file.

The COs we interviewed for this contract confirmed they did not document or justify why a "labor-hour" contracting vehicle was chosen for the award. The COs indicated the contract was a General Services Administration (GSA) competitive agreement with labor-hour rates for additional IT services and support for the new financial management system (IFO project implementation). They assumed they were following WMATA's policies by using the GSA schedule. The COs did not know a labor-hour contract was awarded until OIG had brought this to their

⁴ Determinations and Findings (D & F) - a document created for the contract file to record all the facts that form the basis for an important decision affecting procurement or contract action.

attention. Afterwards, both agreed a written justification was required. The Program Office did not complete the D&F because they thought it was not required.

We discussed the lack of a written justification for a labor-hour contract with the CPO. The CPO agreed PRMT staff did not properly follow policies and procedures, and better controls should have been in place.

Labor-hour contracts are used when it is not possible to accurately define the scope of work, estimate the duration of the work, or anticipate costs with any reasonable degree of confidence, and when no other contract type is suitable. A labor-hour contract provides no incentive to the contractor to control costs or work efficiently. Therefore, it is critical that the Program Office monitors contractor performance and ensures proper controls are in place on this type of contract.

Finding – 2 WMATA did not provide sufficient time for potential offerors to respond to the RFP solicitation

WMATA did not provide potential offerors sufficient time to prepare and submit a proposal. In our analysis of the Request for Proposal (RFP) for FQ-12208, PRMT issued the RFP via email to 10 potential offerors on Thursday, June 7, 2012, at 12:56 PM. The instructions stated all proposals must be received by WMATA no later than Wednesday, June 13, 2012, at 11:00 AM. The RFP was open for six calendar days, including the weekend.

Two of the 10 potential offerors - Metaformers and one other offeror - responded to the RFP. One potential offeror, who decided not to submit a proposal, responded to PRMT that “there was not enough time to prepare a quality response for this requirement.” The two offerors that responded to the RFP were already working in some capacity at WMATA at the time the solicitation was made.

The PPM does not define the time period for publicizing a RFP, although it provides time periods for other types of solicitations (i.e. invitation for bids (IFBs)/ sealed bids). PRMT staff stated there is an unwritten PRMT practice that procurements should be publicized between 21 to 30 days, or a minimum of 10 days. This unwritten practice was not followed for contract FQ-12208. The contract file contained a notation from WMATA's Office of General Counsel (COUN) that the short time period of the solicitation gave the appearance WMATA may have restricted competition.

Although not applicable for RFP's, PPM, § 504.1, states "The CO shall provide a reasonable time for prospective offerors to prepare and submit bids in all IFBs consistent with the needs of the Authority. As a general rule the bidding time for an IFB will be no less than 30 calendar days from the first day of publication. The rule may be waived by the CO responsible for the procurement action where the requesting office demonstrates that there is an urgent need for the supplies, construction, or services, and the file is documented to support the urgency; provided, that the publication is made at least 10 calendar days before bids are due."

It would be beneficial for WMATA to define the time period for publicizing the solicitation for RFP and include the time period in the PPM. Insufficient time allotted to potential offerors may have limited the number of offerors from responding to the RFP solicitation.

Finding – 3 WMATA did not properly document the procurement record after removing an evaluation factor

WMATA did not properly document the procurement record for contract FQ-12208 after removing the evaluation factor regarding the Budgeting/Commitment Control and Enterprise Performance Management (EPM) Functional Resource. This factor was one of nine the Technical Evaluation Team (TET) considered during

the evaluation process. See Appendix 1 for a full listing of the evaluation factors used in the RFP.

The RFP requested offerors to submit resumes to support the two Functional Groupings. The resumes were the evaluation factors. Offerors were informed they could bid for one or both groupings; multiple awards would be entertained.

Functional Grouping #1 consisted of five factors – Accounting Functional Resource; Budgeting/Commitment Control and EPM Functional Resource; Asset Management Functional Resource; Project Costing, Project Management, & Grants Functional Resource; and Customer Contracts and Grants Functional Resource. Functional Grouping #2 consisted of four factors – eProcurement/Purchasing Functional Resource, eProcurement/Purchasing Technical Resource, Inventory Functional Resource, and Inventory Technical Resource.

During our review of the TET evaluation package, we noted the Consensus Report⁵ showed the Budgeting/Commitment Control and EPM Functional Resource factor was removed after the evaluations had been conducted by the TET. The TET Chairperson initially indicated to OIG the evaluation factor was not removed. OIG provided the Chairperson their evaluation report, showing the evaluation factor was removed. The TET Chairperson's report indicated the evaluation factor was removed because "... the team decided to pursue a different strategy for fulfilling this requirement." The CO said this was a modification or out-of-scope change to the solicitation.

PPM, §615 – §615.3, Changes in Authority Requirements states, when either before or after receipt of proposals, the Authority increases, decreases, or otherwise changes its requirements, the Contracting Officer shall issue a written

⁵ A summary of the consensus results of the TET.

amendment to the solicitation. In deciding which firms to notify of a change, the Contracting Officer shall consider the stage in the procurement cycle at which the change occurs and the magnitude of the change, as follows:

- (a) If proposals are not yet due, the amendment shall be sent to all firms that have received a solicitation;
- (b) If the time for receipt of proposals has passed but proposals have not yet been evaluated, the amendment shall be sent only to the responding offerors; and
- (c) If the competitive range has been established, the amendment shall be sent only to those offerors within the competitive range.

According to the PPM §615.3, if a change is so substantial that it warrants complete revision of a solicitation, the Contracting Officer shall cancel the original solicitation and issue a new one, regardless of the state of the procurement. The new solicitation shall be issued to all firms originally solicited and to any firms added to the original list, and shall be advertised in accordance with the requirements of Chapter 4.

We did not see documentation in the contract file indicating the Contracting Officer considered the above policy for changes in the procurement requirements.

By removing an evaluation factor (i.e. Functional Resource) without properly documenting the change, a reviewer of the contract file is not able to determine the firms that should have been notified of a change, and whether the Contracting Officer considered the stage in the procurement cycle at which the change occurred, and the magnitude of the change.

Recommendations

We recommend that the Deputy General Manager Administration/Chief Financial Officer direct the CPO to:

1. Ensure PRMT personnel adhere to WMATA's policy memorandum for time and labor contracts.
2. Define the time period for publicizing the solicitation for RFP and include the time period in the PPM.
3. Ensure PRMT personnel adhere to the PPM in the vendor selection and award process as it relates to changes in Authority Requirements.

Management Comments

Management concurred that the procurement file did not contain the requisite documentation justifying the use of a labor-hour contract at the time that the OIG audit was initiated and the file was reviewed (Finding 1). PRMT initiated its own compliance review of this file and found the same deficiency. Corrective action was taken in January to correct the finding. The CPO has issued a newly revised PPM and has ensured that procurement personnel are fully trained and well versed in the contents of the new PPM. This includes all FTA Guidance.

Management disagreed that WMATA did not allow sufficient time for potential offerors to respond to the RFP solicitation for contract FQ-12208 (Finding 2). Management stated the procurement was a GSA only procurement which had previously gone through a competitive procurement process as per the GSA Schedule Contracts instructions. The GSA is silent as to the required amount of time to publish for response from proposers on the GSA schedules, and there is no written time frame required for GSA offerors to respond to the RFP solicitation. There is also no written time frame in WMATA's PPM for GSA RFPs since the

nature of the work requested is not static and Contracting Officers need judgment and flexibility to determine the market and its availability to respond to the specific offering. However, based on the OIG recommendation, the CPO will consider the time frame allocated for response on all GSA RFPs in the future in order to ensure reasonableness in the response requirements for the solicitation.

Management agreed with Finding 3. The CPO will review with the management staff the process for making changes to Authority Requirements and adherence to the PPM for vendor selection by July 8, 2013.

OIG Response

The corrective actions taken or planned by Management should address OIG's recommendations, if properly implemented.

Objective, Scope and Methodology

The objective of the audit was to determine whether adequate controls are in place to ensure WMATA is following policies and procedures during the vendor selection and award process. To accomplish our audit objective, we interviewed management personnel in the Office of Procurement and Materials, Contract Officers, a Contract Administrator, a Contract Officer Technical Representative, personnel on the Technical Evaluation Team and vendor representatives regarding contract FQ-12208. We also reviewed the WMATA Procurement Procedures Manual, Tenth Addition 2004, PRMT Policy Memorandums, the Source Selection Handbook, and U.S. Department of Transportation, Federal Transit Administration, Circular 4220.1F (Revision Changes 3, dated February 15, 2011), and FTA's Best Practices Procurement Manuals. We reviewed the Metaformers' contract files, evaluation documents, and other documents as needed. The scope of our audit focused on contract FQ-12208, and the audit was conducted during the period of October 2012 to January 2013.

We held an exit conference on March 18, 2013, to discuss the findings and recommendations derived from the audit with management personnel. We conducted our audit in accordance with *Government Auditing Standards* appropriate to our scope. Those standards require that we plan and perform the audit to afford a reasonable basis for our judgments and conclusions regarding the organization, program activity or function under audit. An audit includes assessment of applicable internal controls and compliance requirement of laws and regulations when necessary to satisfy our audit objective. We believe that our audit provides a reasonable basis for our conclusions.

Administrative Matters

Corrective actions proposed (resolution phase) and implemented (closure phase) by the affected Departments/Offices will be monitored and tracked through the Office of the Inspector General's Audit Accountability and Resolution Tracking System. Department policy requires that you develop a final corrective action plan (CAP) for our review in the automated system within 30 days of the issuance of this report. The CAP should set forth specific action items and targeted completion dates necessary to implement final corrective actions on the finding and recommendations contained in this report.

We appreciate the cooperation and assistance extended by your staff during the audit. Should you or your staff have any questions, please contact Andrew Clemmons, Assistant Inspector General for Audits on (202) 962-1014, or me on (202) 962-2515.

Attachment

cc: CHOS – B. Richardson
COUN – C. O'Keeffe
PRMT – H. Obora

Appendix 1

Evaluation Criteria

The vendors were evaluated using the evaluation criteria listed below.

Functional Grouping #1
<p>1. Accounting Functional Resource</p> <ul style="list-style-type: none">A. At least three years experience with implementing and supporting public sector financials using PeopleSoft General Ledger and subsystemsB. At least five years of experience working closely with the organization's comptroller and the accounting department to produce analytical reports and support financial audits
<p>2. Budgeting/Commitment Control and EPM Functional Resource⁶</p> <ul style="list-style-type: none">A. At least three years experience with commitment accounting in a public sector environment using PeopleSoft Commitment ControlB. At least five years of experience of working closely with the Budget department and demonstrated skills on how to implement multi-year operating and capital budgets using PeopleSoft Commitment ControlC. At least three years experience with federal, local/jurisdictional capital funding agreements and their implementation through Commitment ControlD. At least three years of experience with the EPM module (Enterprise Performance Management)

⁶ Item 2 was later removed from consideration by the TET.

3. Asset Management Functional Resource

- A. At least three years experience with fixed asset accounting.
- B. At least five years of experience of working closely with the Accounting department, developing WIP reports, asset transfers and disposals using PeopleSoft.

4. Project Costing, Project Management, & Grants Functional Resource

- A. At least five years experience with Project Costing with designing and configuring the system to generate complex cost collection and funds distribution routines in compliance with accounting standards
- B. At least three years of experience with FTA grants and Project Costing module integrations with General Ledger, Commitment Control and Asset Management modules.

5. Customer Contracts and Grants Functional Resource

- A. At least three years of experience with designing, configuring or implementing PeopleSoft Customer Contracts and Grants
- B. At least three years of experience with FTA grant set up, providing grantor drawdown support, grant mapping and grant adjustments, and knowledge of various types of federal and local/jurisdictional grants.

Functional Grouping #2

6. eProcurement/Purchasing Functional Resource

- A. At least five years of experience with PeopleSoft Procurement, Strategic Sourcing in a functional role
- B. At least three years of experience with Punch-outs and catalogs implementation

7. eProcurement/Purchasing Technical Resource

- A. At least five years of experience with PeopleSoft Procurement, Strategic Sourcing in a technical role, developing technical solutions using PeopleTools, SQRs, and SQL with thorough knowledge of the Procurement related table structures and dependencies.
- B. At least three years experience with EDI and backend interfaces to external vendors.

8. Inventory Functional Resource

- A. At least five years of experience with PeopleSoft Inventory, in a functional role.
- B. At least three years experience with warehousing functions including cycle counting.

9. Inventory Technical Resource

- A. At least five years of experience with PeopleSoft Inventory in a technical role, developing technical solutions using PeopleTools, SQRs, and SQL with thorough knowledge of the Inventory related table structures and dependencies.
- B. At least three years of experience with developing or supporting the data and process interfaces to an asset management system such as Maximo

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SUBJECT: IT No. 13-003: Review of the
Selection and Award Process of
Metaformers Contract FQ-12208

DATE: June 12, 2013

FROM: DGMA/CFO – Carol Dillon Kissal

A handwritten signature in black ink, appearing to read 'Carol Dillon Kissal', written over the printed name.

TO: OIG – Helen Lew

The subject draft report, IT No. 13-003: Review of the Selection and Award Process of Metaformers Contract FQ-12208, was issued on June 5, 2013. Below is management's response.

OIG Recommendations

Finding 1 – WMATA did not justify the use of a labor-hour contract

Management Response:

WMATA management agrees with this finding. The procurement file did not contain the requisite documentation justifying the use of a labor-hour contract at the time that the OIG audit was initiated and the file was reviewed. PRMT initiated its own compliance review of this file and found the same deficiency. Corrective action was taken in January to correct the finding. The procurement file currently contains two records that specifically address the justification for use of a labor-hour contract. By justifying the use of the labor hour contract, it was determined that no other type of contract is suitable based on said justification.

Finding 2 – WMATA did not provide sufficient time for potential offerors to respond to the RFP solicitation

Management Response:

WMATA management disagrees with this finding. This was a GSA only procurement, which had previously gone through a competitive procurement process as per the GSA Schedule Contracts instructions. The contractors under the GSA schedule were established as firms that are specifically geared towards providing personnel to support the nature of work specified under this particular schedule. The nature of the WMATA scope of work in this solicitation was "generic" PeopleSoft support which was fully covered under the GSA schedule.

The following is directly from the GSA website regarding use of GSA schedules:

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How do GSA Schedules Simplify Procurement?

Acquisitions through GSA Schedules are issued using full and open competition. Prices have already been deemed fair and reasonable, and Contracts are in compliance with all applicable laws and regulations, reducing evaluation cycles. Purchases can be made directly from a contractor's GSA Schedule Contract, eliminating time-consuming responses to complex RFP's and lengthy negotiations.

- **Blanket Purchase Agreements (BPAs)** between agencies and contractors under the GSA Schedule are established to meet recurring product/service needs. BPA's reduce administrative costs by eliminating repetitive ordering procedures.
- **Contractor Team Arrangements (CTAs)** are agreements between two or more GSA Schedule Contract holders to work together in order to provide a complete solution to an agency's need.
- **GSA Advantage!**, is an online shopping mall for federal government agencies to view, compare, and directly purchase products and services available through GSA Schedule Contracts.

GSA Schedule Quick Facts

- GSA Schedule Contracts contain pre-negotiated pricing, terms, and conditions
- Pricing has already been deemed "fair and reasonable"
- FedBizOpps Synopsis is not required
- Products can be purchased directly through GSA Advantage! (www.gsaadvantage.gov)
- Agencies can issue RFQ's directly to relevant GSA Schedule holders through GSA eBuy (www.ebuy.gsa.gov) which eliminates the need to receive three quotes
- Search for GSA Schedule Contracts by Contractor Name or Contract Number on GSA eLibrary (www.gsaelibrary.gsa.gov)

The GSA is silent as to the required amount of time to publish for response from proposers on the GSA schedules. Further, in speaking with procurement staff from Department of Defense, Department of Energy and Department of Education, they have indicated that the amount of time for advertisement in a GSA or RFP scenario vary based on the nature of the work contained in the procurement.

The Contracting Officer made a decision on the time frame required for the GSA offerors to respond to the RFP solicitation. There is no written time frame recommended by the GSA or in the Procurement Procedure Manual (PPM) for GSA RFPs since the nature of the work requested is not static and Contracting Officer's need judgment and flexibility to determine the market and its availability to respond to the specific offering. This solicitation required proposers to have both bench strength and immediate availability of personnel to perform the work in the solicitation in the time frame required by the scope of work to support WMATA finance operations. WMATA needed to have support personnel on board to assist in the drawdown of the PRIIA Grant. Based on the urgency of need by the Accounting department, the Contracting Officer decided that the time

frame specified in the solicitation for response was adequate and reasonable and the offerors under the GSA schedule would be able to submit resumes of proposed personnel quickly based on the nature of the work requested. Competition was realized in that more than one proposer submitted a response to this solicitation.

This solicitation was an RFP and any statement made in the Draft Report referring to IFBs or bids is inapplicable in this regard and should be removed.

Finding 3 – WMATA did not properly document the procurement record after removing an evaluation factor

Management Response: Management agrees with this finding and that the Contracting Officer failed to follow the Procurement Procedure Manual (PPM) under Chapter 615 providing procedures in Change in Authority Requirements after receipt of proposals and the Authority decreased its requirement.

Recommendation:

We recommend that the Deputy General Manager of Administration/Chief Financial Officer:

1. Direct the CPO to ensure PRMT personnel adhere to WMATA's PPM and policy memorandums, as well as comply with FTA Guidance, in the vendor selection and award process, when applicable.
2. Direct the CPO to define the time period for publicizing the solicitation for RFP and include the time period of the PPM.
3. Ensure PRMT personnel adhere to the PPM in the vendor selection and award process as it relates to changes in Authority Requirements.

Management Response:

1. The CPO has issued a newly revised PPM and has ensured that procurement personnel are fully trained and well versed in the contents of the new PPM. This includes all FTA Guidance as stipulated in the FTA Circular 4220.1F as well. The PRMT staff is constantly trained through internal and external means to reinforce and ensure compliance with procurement procedures and best practices.

2. The CPO provides guidance to contracting officers with respect to time periods for publicizing solicitations. The amount of time allocated for response in RFPs is purely subjective as to the nature of the scope of work. It is solely a professional judgment exercised by the Contracting Officer and to limit that judgment would be detrimental to the overall procurement process. Based on the recommendation from the OIG, the CPO will consider the time frame allocated for response on all GSA RFPs in the future in order to ensure reasonableness in the response requirement for the solicitation.
3. The CPO will review with the management staff the process for making changes to Authority Requirements and adherence to the PPM for vendor selection by July 8, 2013.