



DOT Faces Challenges in Meeting Federal CPARS Reporting Guidance

Self-initiated

Office of the Secretary of Transportation | ZA2023022 | March 15, 2023

What We Looked At

The Contractor Performance Assessment Reporting System (CPARS) is the official Governmentwide source for entering information on the past performance of Federal contractors. The assessments reported in CPARS can help provide a balanced view of contractor performance and give source selection officials valuable information to consider when making award decisions. This information is particularly important when officials need to make award decisions quickly, such as when responding during natural disasters or to the COVID-19 global pandemic and implementing new legislative requirements with short suspense dates. However, various reports issued by the Government Accountability Office have highlighted the lack of contractor performance information as an ongoing issue in the Federal Government. In addition, a 2017 Department of Defense (DoD) Office of Inspector General (OIG) audit found significant shortfalls in DoD's contractor performance reporting. Given these issues, we initiated this audit to assess the Department of Transportation's (DOT) compliance with requirements for reporting contractors' past performance information.

What We Found

DOT faces challenges in meeting Federal CPARS reporting guidance for the system's registration and assessment deadlines. Specifically, Operating Administration officials assigned CPARS responsibilities frequently did not register contracts within 30 days of the award or complete contractor performance assessments within 120 days after the period of performance ended, as recommended. Overall, DOT's ability to meet its CPARS timeframes is impacted by insufficient departmental oversight and guidance, other priorities and staffing issues, disagreements over contractor assessments, and inadequate training. Until the Department addresses these issues, DOT cannot ensure it is in compliance with CPARS guidance for reporting contractors' past performance information. Also, source selection officials—looking to initiate new procurement actions—may question the value of or may not have the CPARS assessments they need to make timely award decisions.

Our Recommendations

We made 10 recommendations to improve DOT's compliance with requirements for reporting contractors' past performance information. DOT concurred with all 10 recommendations and provided appropriate planned actions and completion dates. We consider all recommendations as resolved but open pending completion of the planned actions.

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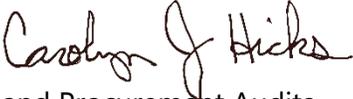
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Memorandum

Date: March 15, 2023

Subject: INFORMATION: DOT Faces Challenges in Meeting Federal CPARS Reporting Guidance | Report No. ZA2023022

From: Carolyn J. Hicks 
Assistant Inspector General for Acquisition and Procurement Audits

To: Senior Procurement Executive, Department of Transportation
Federal Aviation Administrator

The Contractor Performance Assessment Reporting System (CPARS) is the official Governmentwide source¹ for entering information on the past performance of Federal contractors. The assessments² reported in CPARS can help provide a balanced view³ of contractor performance and give source selection officials valuable information to consider when making award decisions. This information is particularly important when officials need to make award decisions quickly, such as when responding during natural disasters or to the COVID-19 global pandemic or implementing new legislative requirements with short suspense dates. With the enactment of the Coronavirus Aid, Relief, and Economic Security Act⁴ and the Infrastructure Investment and Jobs Act,⁵ the Federal Government authorized hundreds of millions of dollars for DOT contractual work that will likely require CPARS assessments. Reliable and complete assessments can play an important role in ensuring contract awards do not go to poorly performing contractors.

¹ Federal Acquisition Regulation (FAR) § 42.1501(b).

² While related Federal guidelines use the terms “assessment” and “evaluation” interchangeably, for the purposes of this report, we will refer primarily to “assessments.”

³ Balanced view refers to assessments that contain both the Government and contractor comments, which allows source selection officials to look beyond a contractor’s references.

⁴ Pub. L. No. 116-136 (2020).

⁵ Pub. L. No. 117-58 (2021).

However, various reports⁶ issued by the Government Accountability Office (GAO) have highlighted the lack of contractor performance information as an ongoing issue in the Federal Government. In addition, a 2017 Department of Defense (DoD) Office of Inspector General (OIG) audit found significant shortfalls in DoD's contractor performance reporting.⁷ Given these issues, we initiated this audit to assess the Department of Transportation's (DOT) compliance with requirements for reporting contractors' past performance information.

We conducted our work in accordance with generally accepted Government auditing standards. Exhibit A details our scope and methodology. Exhibit B lists the organizations we visited or contacted, and exhibit C lists the acronyms used in this report.

We appreciate the courtesies and cooperation of DOT representatives during this audit. If you have any questions concerning this report, please contact me or Darren Murphy, Program Director.

cc: The Secretary
DOT Audit Liaison, M-1
FAA Audit Liaison, AAE-10

⁶ Government Accountability Office (GAO), *Actions Taken to Improve Reporting of Past Performance Information* (GAO-14-707), August 2014; GAO, *Contractor Performance DOD Actions to Improve the Reporting of Past Performance Information* (GAO-13-589), June 2013; and GAO, *Federal Contractors Better Performance Information Needed to Support Agency Contract Award Decisions* (GAO-09-374), April 2009.

⁷ Department of Defense Office of Inspector General (DoD-OIG), *Summary of Audits on Assessing Contractor Performance: Additional Guidance and System Enhancements Needed* (DODIG-2017-081), May 9, 2017.

Background

Federal source selection officials and Contracting Officers (CO) use CPARSi to communicate contractor strengths and weaknesses, ensure that the Government does business with contractors that provide quality products and services, and select the most qualified contractors for future awards. They also rely on CPARS to help them make informed business decisions regarding Government contracts.⁸

DOT and the Federal Aviation Administration (FAA) contracting activities are governed by the Federal Acquisition Regulation (FAR) and the FAA Acquisition Management System (AMS), respectively. Both the FAR and AMS consider a contractor's past performance relevant for future source-selection purposes.⁹ These requirements also specify that the appropriate users must enter past-performance information into CPARS at least annually and at the time the contractor completes the work.¹⁰ In addition, DOT's Transportation Acquisition Manual (TAM) establishes departmental responsibilities—applicable to all Operating Administrations (OA) except FAA—for recording and maintaining contractor performance information in CPARS.¹¹

The *Guidance for the Contractor Performance Assessment Reporting System* (CPARS guide)¹² is a non-regulatory guidance that gives CPARS users useful information and best practices. The guide, which is intended to be read in conjunction with the FAR,¹³ includes processes and procedures for reporting information on contractor past performance. It also instructs each agency to establish key positions to oversee and administer the reporting process. These positions include: Department and Agency Points of Contact (POC), Focal Point (FP), Alternate Focal Point (AFP), Assessing Official (AO), Assessing Official Representative (AOR), and Reviewing Official (RO). Contractors also have a voice in the process by assigning a Contractor Representative (CR).¹⁴ Figure 1 illustrates where each of these positions fit within the overall CPARS registration and assessment process. Also, see exhibit E for descriptions of CPARS roles and responsibilities and exhibit F for details on the CPARS process.

⁸ While the FAR, TAM, AMS, and CPARS guide use the terms “contracts” and “orders,” for the purposes of this report, we will refer primarily to “contracts.”

⁹ FAR § 42.1501(a) and FAA AMS T3.10.1B 9(b).

¹⁰ FAR § 42.1502(a) and AMS T3.10.1B 9(c).

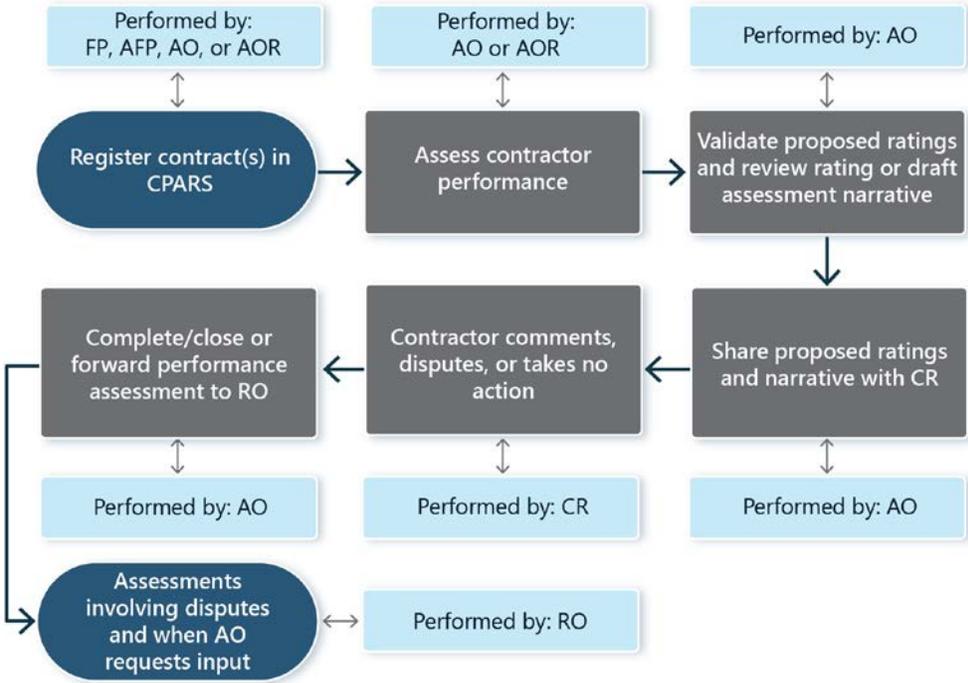
¹¹ TAM § 1242.1502(a).

¹² Although the guide has been updated various times between 2017 and 2022, none of the changes impacted our audit findings.

¹³ The FAA's CPARS Appendix 3 is intended to be read in conjunction with AMS Procurement Guidance T3.10.1B 9.

¹⁴ Not all of the CPARS positions are used by every agency. For example, FAA does not use AFPs or AORs.

Figure 1. CPARS Registration and Assessment Process



Source: CPARS guide

Although not represented in the above figure, the Department’s POC is critical among the key positions, since they oversee the use of CPARS for the Office of the Secretary of Transportation (OST), the Volpe National Transportation Center (Volpe), and the OAs. The Department POC also has the duty to grant system access to an Agency POC for each OA. The latter position is authorized to assign and transfer OA FPs, as well as provide CPARS-related metrics reports to senior management.

Results in Brief

DOT faces challenges in meeting Federal CPARS reporting guidance.

Based on our review, the Department is challenged in meeting recommended CPARS registration and assessment deadlines. Specifically, OA officials assigned CPARS responsibilities frequently did not register contracts within 30 days of the award or complete contractor performance assessments 120 days after the period of performance ended, as recommended by the CPARS guide. According to DOT officials, staffing issues and competing work priorities have prevented OAs from registering contracts within 30 days. When delays in the registration

process are extreme, such as more than a year, it can affect the timely completion of the assessments. Additionally, most OAs did not meet the 120-day timeframe for completing contractor performance assessments for a variety of additional reasons—such as assigned staff not completing assessments before departing or transitioning the contract to a new CO prior to leaving their positions. Overall, the Department’s ability to meet CPARS timeframes is impacted by insufficient departmental oversight and guidance, other priorities and staffing issues, disagreements over contractor assessments, and inadequate training. As a result, DOT frequently produces delayed assessments. Such delays undermine contracting officials’ ability to rely on CPARS when making award decisions—thus creating a risk of making awards to poorly performing contractors. This risk extends beyond DOT because CPARS is used Governmentwide.

We are making recommendations to improve compliance for reporting contractors’ past performance information.

DOT Faces Challenges in Meeting Federal CPARS Reporting Guidance

Departmental officials face a number of challenges in meeting Federal timeframes for registering contracts and assessing contract performance in CPARS. In particular, insufficient departmental oversight and guidance, other priorities and staffing challenges, disagreements over contractor assessments, and the need for more training have made it difficult for DOT to adhere to CPARS timeliness recommendations.

The Department Did Not Fully Meet CPARS Reporting Deadlines

Departmental agencies frequently did not meet CPARS guidelines for registering contracts within 30 days of the award or completing contractor performance assessments 120 days after the period of performance ended. Moreover, the Department, on average, missed these deadlines by more than 12 months.

OAs Frequently Did Not Register Contracts Within 30 Days of the Award

Although the CPARS guide only recommends that a contracting office should register all new contracts no more than 30 calendar days after they are

awarded,¹⁵ both the Department and FAA have made this a requirement.¹⁶ Within each OA's contracting office, the FP or AFP is responsible for performing this duty. Although this process can be done manually, CPARS has an Auto Register function that provides basic contract information from the Federal Procurement Data System–Next Generation (FPDS-NG).¹⁷ However, officials responsible for registering a contract still need to accept this information and check a box in CPARS to finalize the process. The FP and AFP can also elect not to use this function and manually enter contract data into CPARS.¹⁸ Furthermore, CPARS does not send notifications to alert the FP or AFP that a contract is available for registration; therefore, these officials need to monitor CPARS on a regular basis.

However, we found that most OAs did not meet the timeframe for registering their contracts within 30 days of the contract award. Specifically, of the 120 procurement actions in our sample, 89 (74 percent) were not registered timely, and 49 of those 89 were not entered into the system for over a year. Moreover, 30 of these took over 2 years to register. In the most extreme examples:

- FAA was 1,246 days late registering a 7-year \$52 million contract for maintenance on security systems at about 615 FAA facilities.
- The Federal Transit Administration (FTA) was 1,717 days late registering a 5-year \$9.6 million contract seeking technical support.
- The Great Lakes St. Lawrence Seaway Development Corporation (GLS) was 1,202 days late registering a 2-year \$6.3 million contract for concrete demolition.

Overall, we found that the Department took an average of 421 days to register contracts in CPARS, with less than 26 percent of the 120 procurement actions in our sample meeting the 30-day registration requirement (see figure 2). For more details on each OA's contract registration, see exhibit G.

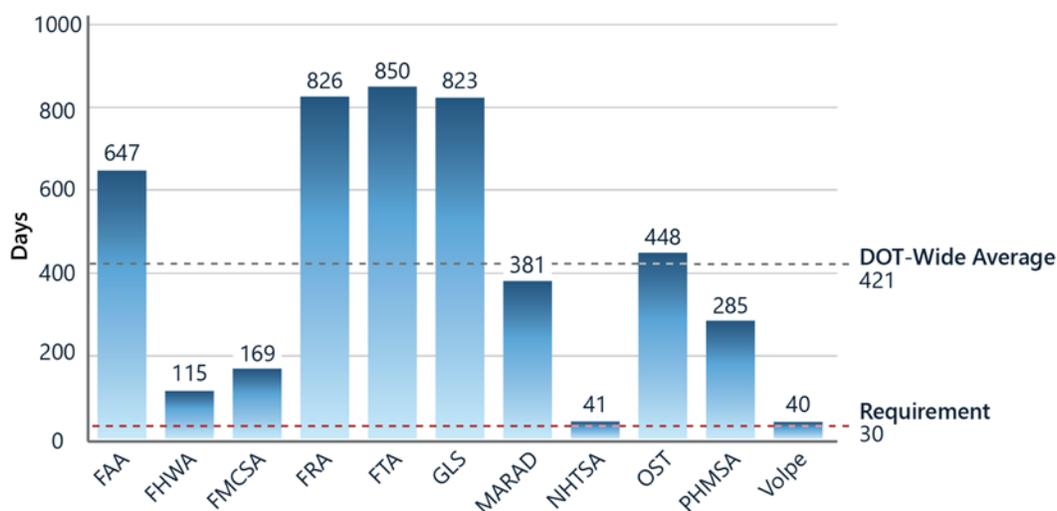
¹⁵ TAM § 1242.1503(a)(2)(1) and FAA Procurement Guidance, appendix-FAA CPARS Guide § 3.0, specifically require contracts to be registered within 30 calendar days.

¹⁶ A contract is considered awarded on the date the CO signs it.

¹⁷ A database for Government contracts with an estimated value over the \$10,000 micro-purchase threshold.

¹⁸ The AO and AOR can also manually register contracts. Moreover, an AO may elect to complete an assessment below the designated FAR thresholds.

Figure 2. Average Timeliness for Contract Registration in CPARS, FY 2017–2020



Source: OIG analysis of sampled procurement actions covering fiscal years 2017–2020

Various factors can contribute to an OA’s inability to register contracts within 30 days. When we asked why the OAs were not meeting the 30-day requirement, DOT officials cited staffing issues—unfilled vacancies, attrition, and turnover of contracting personnel—as well as competing priorities due to a shift in agency workload, mission requirements, and collateral duties. For example, many OAs indicated that workload priorities do not always include their CPARS duties, which impacts the FP’s and AFP’s ability to perform their assigned CPARS roles. An official at another OA stated delays occurred when the Auto Register function was not being used for 5 years.

Based on our review, National Highway Traffic Safety Administration (NHTSA) was relatively successful in meeting the 30-day registration requirement. As noted in exhibit G, the Agency registered 75 percent of its four procurement actions in our sample within 30 days. NHTSA used an automated tool that reminds FPs to check CPARS for contracts available for registration to improve CPARS registration compliance. The system is a best practice that allows NHTSA to ensure contracts are usually registered in CPARS in a timely manner.

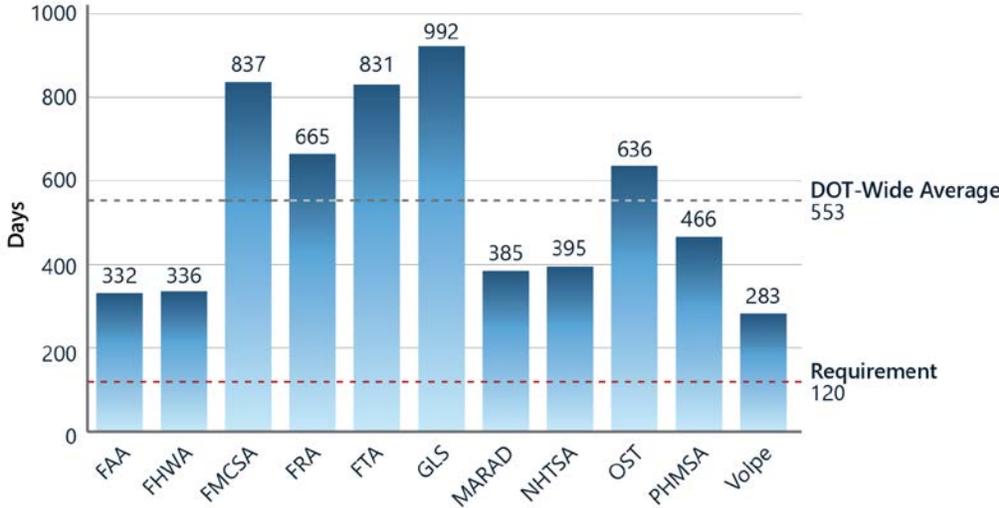
Most OAs Did Not Meet the 120-Day Recommendation for Completing Contractor Assessments

The FAR, AMS, and CPARS guide all require AOs or AORs to prepare contractors’ past-performance assessments at least annually upon contract completion or final delivery. In addition, the CPARS guide states that the AOs should complete these assessments no later than 120 calendar days from contract completion or

final delivery.¹⁹ Once a contract is registered and roles are assigned in CPARS, the system sends weekly email notifications to the FP, AO, and AOR until the assessment process is initiated. The system also delivers an automatic notification to the AO and FP if they do not complete an assessment within 120 days, and continues to notify them weekly until the assessment is completed.²⁰

Even with the various system notifications, most OAs did not complete contractors' past-performance assessments within the recommended 120 days. Specifically, only 33 of the 180 assessments in our sample of procurement actions (18.3 percent) met the 120-day timeframe. On average, AOs and AORs took 553 days to complete the assessments in our sample (see figure 3). For more details on each OA's CPARS assessments, see exhibit H.

Figure 3. Average Timeliness for Contractor CPARS Assessment, FY 2017–2020



Source: OIG analysis of the 180 assessments in our sample covering fiscal years 2017–2020

As an OA cannot initiate a contractor's performance assessment until it has registered the contract in CPARS, delays in the registration process—such as those we found during our review—can impact the timely completion of these assessments. In fact, we found that OAs took more than a year to complete 86 of the 180 assessments in our sample—with 10 of these assessments taking more than 3 years to complete. For example:

¹⁹ Unlike the 30-day registration requirement, DOT has not established the 120-day assessment timeframe in departmental policy. In contrast, FAA set an even more rigorous requirement of completing assessments within 60 days (i.e., AMS T3.10.1(B9)).

²⁰ CPARS Manual, CPARS Email Notifications.

- FTA had a 5-year \$9.6 million contract to provide contract technical support for Federal acquisitions. It took over 4 years for FTA to register the contract and complete the first assessment.
- The Federal Highway Administration (FHWA) had a 2-year contract, valued at \$1.3 million, for pavement repairs along a trail in Death Valley National Park. FHWA did not register the contract in CPARS for 2 years and did not complete the final assessment until over 3 years after the work had been completed.
- The Federal Railroad Administration (FRA) had a 5-year \$136 million contract for operation and maintenance of its track inspection program. FRA took over 2 years to register the contract and over 3 years to complete the first assessment.

When asked, OA officials said staff did not meet the 120-day timeframe for a variety of reasons. These included staff having higher work priorities, leaving an Agency without completing their assessments, and moving to a new job without transitioning the contract to a new CO. Additionally, based on our review, AOs' and AORs' timely completion of an assessment was affected when they did not receive a system notification that an assessment is due. This lack of notification can occur when the FP or AFP does not assign the roles for the AO or AOR in CPARS. Volpe has taken steps to ensure CPARS role assignments are both current and accurate by requiring contract modifications whenever there is a change in COs or Contracting Officer Representatives (CORs)—who may serve as AOs and AORs—assigned to a procurement action. The contract modification triggers CPARS updates to assign new roles. By taking these steps, Volpe ensures that CPARS accurately lists the officials responsible for completing the contract assessments.

Furthermore, based on our survey of OA staff who had CPARS access during our audit, 60 of the 86 survey respondents (70 percent) who answered this question had encountered one or more of the following issues—lack of staff, other priorities, or delays in getting information on contractor performance—which prevented them from completing CPARS assessments in a timely manner.

To reduce the risk of selecting contractors with prior performance issues, Government decision makers benefit from having access to timely CPARS information. To ensure this information is available, DOT relies on an efficient contractor assessment process where new contracts are registered in CPARS within 30 calendar days and contractor performance is assessed annually and no later than 120 calendar days after the period of performance ends. However, the Department faces several key challenges that hamper its CPARS reporting, as we discuss in detail below.

Several Challenges Affected DOT's Ability To Meet Its CPARS Reporting Requirements

The Department faces challenges in meeting CPARS reporting requirements due to four main factors: insufficient departmental oversight and guidance, other priorities and staffing issues, disagreements over contractor assessments, and inadequate training.

DOT Does Not Provide Adequate CPARS Oversight and Guidance to Its OAs

In 2013, the Office of Management and Budget (OMB) issued a memorandum to help Federal agencies improve the collection and use of performance and integrity information. The memorandum established a baseline for reporting compliance—setting aggressive performance targets to monitor and measure reporting compliance and ensure the acquisition workforce is trained to report and use this information.²¹ Although OMB initially established a 100-percent annual performance reporting target for fiscal year 2015, it was eliminated in 2017 as part of a Governmentwide effort to reduce administrative requirements.²²

In 2015, DOT updated the TAM to require OAs to establish internal procedures for implementing CPARS.²³ These procedures included training requirements for FPs, AOs, ROs, and contractors, as well as for administering the CPARS system, monitoring timely completion of reports, and verifying report integrity. The Department also directed the OAs to select appropriate Government personnel to serve as the AORs who provide input into contractor performance assessments and AOs who review, finalize, and sign the assessments. However, the TAM only addresses the 30-day registration timeframe, whereas AMS addresses both registration and assessments (although it sets a more rigorous timeframe of 60 days compared the CPARS 120-day recommendation).

Based on our review, only 5 of the 11 OAs have developed internal CPARS procedures that address training, as well as the 30-day registration and 120-day assessment timeframes (see table 1).

²¹ OMB, *Improving the Collection and Use of Information about Contractor Performance and Integrity*, March 6, 2013.

²² See OMB M-17-26, *Reducing Burden for Federal Agencies by Rescinding and Modifying OMB Memoranda*, June 15, 2017.

²³ TAM § 1242.1503, Procedures. However, this training requirement did not include AFPs.

Table 1. OAs With Internal CPARS Procedures

Operating Administration	Training	30-Day Registration	120-day Assessment
FAA	Yes	Yes	Yes ^a
FHWA	Yes	Yes	Yes
Federal Motor Carrier Safety Administration (FMCSA)	No	No	No
FRA	Yes	Yes	Yes
FTA	Yes	Yes	Yes
GLS	No	No	No
Maritime Administration (MARAD)	No	Yes	Yes
NHTSA ^b	No	No	No
OST	No	No	No
Pipeline Hazardous Material Safety Administration (PHMSA)	No	No	No
Volpe	Yes	Yes	Yes

^a FAA has a 60-day requirement to complete past performance assessments.

^b NHTSA's 2016 draft internal policy addresses the 30-day registration and 120-day assessment requirements. The Agency plans to finalize the policy by March 2023.

Source: OIG analysis

Although OMB eliminated the 100-percent annual performance reporting target in 2017, the Office of the Senior Procurement Officer (OSPE) continued to focus on improving the Department's CPARS reporting. On November 27, 2020, OSPE issued a memorandum²⁴ establishing DOT-wide, quarterly CPARS compliance targets for fiscal year 2021. OSPE's goal was to improve past-performance reporting incrementally by incorporating a series of quarterly goals that would allow OAs to achieve 35, 55, 75, and 90 percent of DOT's reporting requirements. The memorandum also emphasized the OAs' responsibilities for recording and maintaining contractor performance information in accordance with the FAR and

²⁴ DOT DASH 2021-01, November 27, 2020.

the TAM.²⁵ On November 29, 2021, OSPE issued a second memorandum²⁶ that set the target at 90 percent for fiscal year 2022. OSPE plans to issue a fiscal year 2023 DOT DASH to continue its efforts to improve CPARS reporting compliance.

Moreover, during the course of our audit, the Department took a number of other steps in fiscal years 2021 and 2022 to improve the OAs' compliance with CPARS requirements. For example:

- In fiscal year 2021, OSPE required corrective action plans from OAs that did not meet performance reporting targets.
- In fiscal year 2021, OSPE began providing regular CPARS compliance reports to the chiefs of all OA contracting offices, as well as the heads of contracting activities and members of the Strategic Acquisition Council.²⁷
- In fiscal year 2021, OSPE updated the Department's Procurement Management Review Program to include compliance with DOT DASH 2022-01.
- In fiscal year 2022, OSPE required specified acquisition staff (i.e., COs and CORs) holding or pursuing Federal Acquisition Certification (FAC) to take a class developed by the Federal Acquisition Institute (FAI) called Past Performance (FAC-079)²⁸ by June 30, 2022.²⁹

The OAs also took actions to improve the timeliness of their CPARS assessments—some of which could serve as potential best practices for other DOT agencies. For example:

- Volpe included a CPARS compliance requirement in its performance standards for contract specialists and maintains a CPARS email address for responding to user questions.
- The Pipeline and Hazardous Materials Safety Administration (PHMSA) has established weekly and quarterly milestones that include (1) compiling weekly lists of outstanding contracts actions requiring registration, (2) holding weekly CPARS meetings to review outstanding actions, and

²⁵ FAA was exempted from complying with OSPE's 2020 memorandum. However, the Agency chose to follow the quarterly compliance metric targets.

²⁶ DOT DASH 2022-01, November 29, 2021.

²⁷ The Strategic Acquisition Council's mission is to provide a forum for senior acquisition leaders in each OA to address issues affecting DOT's procurement community, facilitate a consistent focus on acquisition improvement throughout the Department, and ensure that acquisitions strategically contribute to DOT's mission.

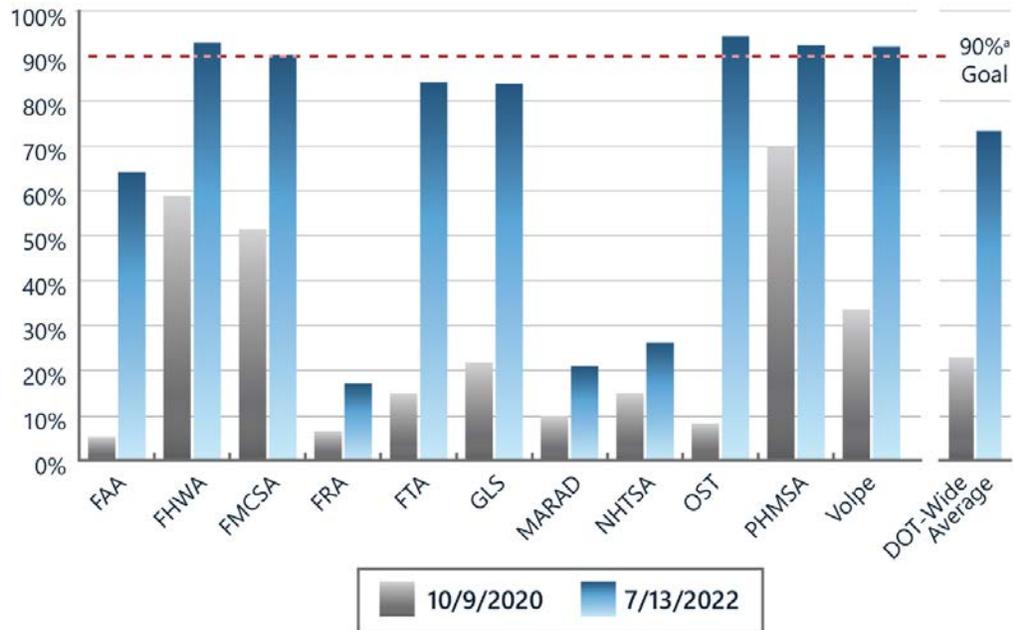
²⁸ FAC-079 provides training for acquisition workforce members on how to prepare past performance assessments, write assessment narratives, rate contractor performance, and use contractor performance information during the award stage.

²⁹ As of July 25, 2022, 18.7 percent of the DOT employees were non-compliant with this requirement.

(3) providing a quarterly update to its management team and senior executives on the status of outstanding CPARS actions.

While the Department has had relative success achieving timelier contractor performance assessments since we began our audit, several of the OAs continue to have difficulty. We compared the 120-day compliance rate of the assessments from a CPARS Compliance Metrics Report to the current DOT compliance rate to assess the effectiveness of the Department’s oversight and guidance. We found that, to some extent, DOT has improved its ability to complete assessments in 120 days. For example, for fiscal years 2017 through 2020, the Department’s overall compliance rate was 18 percent for our sampled contracts (see figure 3). However, our analysis showed, as of July 2022, the Department’s compliance rate was 73 percent with five OAs exceeding 90 percent (see figure 4). For more details on the 120-day comparison, see exhibit I. Nevertheless, three OAs still appear to have significant challenges meeting OSPE’s assessment goals, with compliance rates ranging between 17 and 26 percent.

Figure 4. Changes in 120-Day CPARS Assessment Compliance Rates After DOT Established Targets



^a For fiscal year 2022, OSPE set a 90 percent goal for all OAs.

Source: OIG analysis based on OSPE data

Clearly, OSPE’s efforts have helped improve the Department’s compliance with the 120-day assessment timeframe. However, we see no comparable goals

regarding the 30-day requirement to register contracts in CPARS. Neither the 2020 nor the 2021 memorandum addressed the Department's difficulties in this area. When we asked about DOT's efforts to address the 30-day registration delays, OSPE acknowledged it does not have a metric or standard report that measures compliance with this requirement. Furthermore, Agency officials noted that the Department updated its annual Procurement Management Review process to add the management of past performance information and CPARS compliance as a special focus area for fiscal year 2022. Yet, this review process does not currently cover measuring compliance with the 30-day requirement. As such, given the close connection between registration and assessment, DOT cannot ensure that its contracts are both registered and, in turn, associated contractors assessed in accordance with the CPARS timeframes.

Competing Work Priorities and Staffing Issues Hamper OAs' Ability To Meet CPARS Reporting Guidelines

Based on information provided by DOT officials tasked with CPARS responsibilities, competing work priorities and staffing constraints pose additional challenges for OAs trying to comply with CPARS reporting timeframes. Within the OAs, the responsibility for managing CPARS is typically a collateral duty. Individuals tasked with registering contracts or drafting assessments are also responsible for administering acquisitions. At times, the COs or the CORs who serve as AOs or AORs have responsibilities that take precedence over CPARS. As one survey respondent noted about CORs, "...CPARS is not their priority and COR duties are usually an additional job on top of their normal tasks."

Several OAs stated that competing priorities and staffing constraints—both the lack of available staff and staff turnover—were reasons for their noncompliance with CPARS reporting requirements. One OA stated the primary reason for delays in completing assessments is the reassignment/turnover of COs and CORs. Moreover, in our survey of CPARS users, 59 percent of respondents cited other priorities, while 45 percent pointed to staffing as issues causing delays. A survey respondent told us "Contracting departments throughout the Government are short staffed and overworked." Another respondent pointed out that if staff who leave do not document contractor performance well, the resulting assessments may be untimely and less than meaningful.

To minimize the impact of staff turnover, various CPARS policies cite the need for the departing official (e.g., the AO or AOR) to complete interim assessments of the contractors they have been monitoring. For example, the TAM calls for such individuals to assess contractor performance before leaving their duties. The CPARS guide recommends interim assessments when a significant change occurs, including a change in program or project management responsibilities or before the transfer of AOR or AO duties from one individual to another. Similarly, FAA's

AMS requires an intermediate CPARS assessment upon a change in program management responsibility and prior to a transfer of AO duties from one individual to another. However, with one additional exception,³⁰ the other OAs have not developed procedures for ensuring the timely reassignment of CPARS personnel when staff depart, or addressed the need for departing personnel to complete interim assessments. As a result, OAs lacking such procedures risk assessment delays.

Disagreements Over Contractor Assessments Can Also Cause CPARS Reporting Delays

According to survey respondents, contractors disagreeing with their performance assessments is another reason for CPARS reporting delays. The CPARS guide states that once an AO or AOR completes a CPARS assessment, the AO should forward it to the contractor for review. The contractor has 60 days to provide comments and note any disagreements. If the contractor is unable to resolve its issues with the AO, the RO will make the final determination. Such disagreements, efforts to resolve them, and the final determination are steps that CPARS guidance expects to take place within the 120-day timeframe. Nearly half of our survey respondents noted that they had experienced disagreements with contractors. More importantly, a third of the respondents noted that such disagreements with contractors have led to delays in completing assessments. For example, our sample included two assessments with disagreements that exceeded the 120-day timeframe by 5 months and 19 months, respectively.

Furthermore, rating officials³¹ may feel pressure to avoid contractor disagreements in order to meet the 120-day timeframe. This pressure can be counterproductive because rating officials may not have the time to conduct accurate contractor assessments—a dilemma noted by survey respondents. One stated, “I do not believe our Agency is alone in rating a vendor satisfactory rather than a lower rating because there is not enough staff that can devote the time required when there are disagreements on the evaluations.” Another respondent said, “There is such a negative incentive to provide a poor rating that there are very few of these, making the entire process virtually meaningless.” Due to the issues described, rating officials may feel pressured to avoid contractor disagreements.

Currently, each OA is not required to have guidance to assist OA CPARS officials with managing assessment disagreements with contractors. Yet, as highlighted by the comments above, DOT faces the challenges of balancing the 120-day

³⁰ Volpe has a CPARS compliance requirement in its performance standards aimed at holding contract specialists and managers accountable for ensuring assigned CPARS assessments are completed on time.

³¹ We are using the term rating official to refer the AOR or AO who enter ratings to reflect contractor performance in CPARS.

timeframe with the process and resources needed to resolve contractor disagreements, while also achieving meaningful contractor assessments in CPARS.

CPARS Training and Related Requirements Are Not Sufficient

Lack of CPARS-related user training (e.g., roles and functions) for FPs, AFPs, AOs, ROs, and CRs can also contribute to untimely reporting. According to the TAM, OAs are required to establish internal CPARS procedures that include training requirements for CPARS users. Similarly, AMS³² states the procedures shall include training requirements for FPs, AOs, ROs, and CRs.³³

However, the TAM does not require CPARS training for AFPs and AORs—both of which can play significant roles in the CPARS process. For instance, according to our survey respondents, CORs—who frequently serve as AORs—play an important part in CPARS assessments but may not receive sufficient role- and function-based training to perform the role correctly. They also help with contract administration and technical oversight and work closely with COs and other personnel to complete the CPARS reporting process. However, as one survey respondent wrote, “...acquisition receives terrible COR write-ups as they are untrained (or have little training)...” Another respondent said, “CORs don’t have enough training or awareness that CPARS is a requirement.” Other respondents said some CPARS assessments were not completed in 120 days or less because the CORs did not know it was their responsibility or misunderstood reporting at the order or contract level. Similarly, one FAA official told us, “The COR was unaware that the evaluation had to be completed...prior to the contract obligations exceeding the required dollar threshold.”³⁴ When we asked about the CPARS training FAA provides to CORs, Agency officials told us that “CORs are not required to take a CPARS-specific training class at this time.” However, FAA does have training requirements for FPs, AOs, ROs, and CRs.

There are several resources available to the OAs’ acquisition workforces to improve their working knowledge of CPARS, including how to draft performance assessments. For example, the Defense Acquisition University (DAU) provides online classes on contractor past performance (see table 2).

³² FAA AMS CPARS Guide, appendix 3, April 2022.

³³ FAA does not use the AFP and AOR CPARS positions. As a result, AMS does not require training for these positions.

³⁴ Although FAA does not have AORs, CORs can serve in this capacity along with program managers or other individuals familiar with a contract.

Table 2. Available DAU Training

Training Title	Description
FAC 089 Writing Quality Past Performance Evaluations	The components of writing a good contract effort description ^a and past performance evaluation narrative, and how to rate a contractor's performance.
CLC 028 Past Performance	The rationales for collecting past performance information, why this information should be used, and how its use improves contractor performance.
CPARS Overview	An overview of the policies and regulations governing CPARS, the CPARS workflow, and CPARS application functionality.
FAC-079 Past Performance	An understanding of how to prepare past performance evaluations, write evaluation narratives, rate contractor performance, and use contractor performance information during the award stage.

^a DAU defines contract effort description as a clear, nontechnical description of the principal purpose of the contract or order.

Source: DAU

In addition, the CPARS website offers on-demand classes and tutorials based on user roles and functions (see table 3).

Table 3. Available CPARS Module Training

Training Title	Description
CPARS Overview	Includes an overview of the policies and regulations governing CPARS, the CPARS workflow, and CPARS application functionality.
Access Authorization	Provides FPs and AFPs with a demonstration of how to manage user access in CPARS.
Focal Point Access Process	Demonstrates to the new FPs how to request a Focal Point account.
Report Scheduler ^a	Provides the Department POC and Agency POCs with a demonstration on how to use the Report Scheduler to automatically run and send specific CPARS reports via email as file attachments.

^a The Report Scheduler is a way to monitor the status of evaluations and contracts and allows users to run and email reports automatically.

Source: CPARS website

Some DOT staff who play a role in the CPARS process, i.e., who are not COs or CORs, are not required to take DAU's training on writing quality past performance reviews. As previously noted, this training only applies to CPARS users with CO and COR certifications. Other users are not informed about or encouraged to seek out these additional training options.

While some OAs told us that they have provided additional training; only FHWA provided any documentation to support its claims. In addition, some of our survey respondents indicated that CPARS training is insufficient. For example:

- "Assessing officials and evaluation writers need more training and guidance on FAR 42.1503 table 42-1 and the j[u]stifications need[ed] to support each rating."³⁵
- "It would be ideal if the Department could provide additional training and guidance on at least a quarterly basis."
- CPARS users "need more hands on training...at the Division level."

A number of OAs have recognized the need for additional CPARS training requirements. For example:

- Volpe is "working to establish an internal SOP [standard operating procedure] in accordance with [the] TAM...to include training requirements."
- FTA stated that it had established best practices and increased staff training to ensure CPARS timelines are met.
- FRA officials noted they had made progress in "implementing training and internal controls so as to ensure that contract/order registration and contractor evaluations meet CPARS Guidance timelines."

Notwithstanding these ongoing efforts, the Department's challenges meeting CPARS reporting requirements mean source selection officials—looking to initiate new procurement actions—may question the value of or may not have the CPARS assessments they need to make timely award decisions. Source selection officials' lack of confidence in CPARS could impact their willingness to rely on the contractor assessments when making award decisions.

³⁵ FAR 42.1503 covers procedures for evaluating past performance and includes table 42-1, which details rating definitions.

Conclusion

CPARS is an important tool available for source selection officials and contracting officers seeking to select the best qualified contractors to meet an agency's need and foster good contractor performance. COs and source selection officials regularly rely on clear and timely CPARS reports to make their award decisions with relevant information on contractor past performance. Yet we found gaps in the Department's policies and procedures that hamper its ability to timely register contracts and complete assessments in CPARS. Timely information on contractor performance is helpful to executing large funding efforts requiring rapid selection of contractors such as those that are likely to arise from legislation like the Coronavirus Aid, Relief, and Economic Security Act and Infrastructure Investment and Jobs Act. Implementing the requirements of these acts will lead to the creation of many new transportation-related contracts—most of which will require CPARS registrations, assessments, and reports. Until the Department fully implements all of the steps to increase its overall CPARS compliance rate, it cannot ensure that it is contributing to contractor past performance information for Governmentwide source selection officials.

Recommendations

To improve compliance with requirements for reporting contractors' past performance information, we recommend that the Senior Procurement Executive:

1. Develop and implement procedures to monitor Operating Administrations' (OA) compliance with the 30-day registration requirement in accordance with the Transportation Acquisition Manual (TAM).
2. Update the TAM to require that contractor performance assessments be completed within 120 calendar days in accordance with the Contractor Performance Assessment Reporting System (CPARS) guide.
3. Develop and implement procedures to ensure those OAs without internal CPARS guidance have them established in compliance with TAM 1242.1503(a)(1).
4. Update the TAM to require each OA to develop and implement guidance to address turnover in CPARS staff as well as ensure departing personnel complete interim assessments.

5. Update the TAM to require CPARS role- and function-based training for all users not currently cited, including Alternate Focal Points and Assessing Official Representatives.
6. Update the TAM to require each OA to develop and implement guidance to assist OA CPARS officials in managing assessment disagreements with contractors.
7. Adopt a process to conduct periodic assessments to identify shortfalls and projected needs in CPARS training.

To improve compliance with requirements for reporting contractors' past performance information, we recommend that the Federal Aviation Administrator:

8. Develop and implement procedures to monitor compliance with the 30-day registration requirement.
9. Update the Acquisition Management System to require CPARS training for all personnel who have CPARS responsibilities.
10. Conduct an assessment of CPARS user training and develop and implement plans to meet identified needs, including training geared to assisting CPARS officials in developing skills for managing disagreements with contractors.

Agency Comments and OIG Response

We provided DOT with our draft report on December 16, 2022, and received its response, dated January 30, 2023, which is included as an appendix to this report. DOT concurred with all 10 recommendations and provided appropriate planned actions and completion dates. Accordingly, we consider all recommendations as resolved but open pending completion of the planned actions.

Actions Required

We consider all recommendations resolved but open pending completion of the planned actions.

Exhibit A. Scope and Methodology

This performance audit was conducted between September 2021 and December 2022. We conducted this audit in accordance with generally accepted Government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. Our objective was to assess DOT's compliance with requirements and for reporting contractors' past performance information.

To conduct our audit, we reviewed relevant CPARS laws, regulations, and guidance, as well as departmental and OA policies and procedures. We also reviewed OMB and DOT Memoranda relevant to our objective. We interviewed OSPE and OA acquisition officials on their current guidance and procedures for entering CPARS data, related compliance and training programs, and basis for low compliance rates. Finally, to gain a further understanding of how DOT complies with CPARS requirements, we interviewed 11 entities—OST, the Volpe Center, and 9 OAs.

To compile our audit universe, we asked OST, Volpe, and each OA to provide contracting data that reflected award actions from fiscal year 2017 to fiscal year 2020 and that required a past performance assessment. OST, Volpe, and the OAs collected contract data files from the FPDS-NG. This universe included the best information available since each Federal department annually certifies that the data contained in FPDS-NG is complete. We combined these records into one file to be used for the CPARS universe, which contained 20,544 contract actions. We removed 3,483 contract actions that had either negatives or zero values, reducing the universe to 17,061. We combined these actions using the Procurement Instrument Identifier data field and removed contracts that had zero, negative, or missing values. The final universe contained 4,764 contracts valued at \$11.6 billion.

For sample size computations, we used an estimated noncompliance rate of 50 percent, a confidence level of 90 percent, and a precision no greater than +/- 10 percent. We created 12 strata: 1 census stratum and 11 strata for each OA. We allocated sample sizes to each strata as approximately proportional to the total contract value in each strata with a minimum of two contracts per strata. The final sample size was 92. Sampling was probability proportional to size of the total contract value. A statistical sample of 92 contracts, which included a total contract value of \$2.7 billion or 24 percent of the \$11.6 billion in our universe. We used this sampling methodology because it is widely used and accepted in the accounting industry and Government auditing. Due to time constraints and

duplicates, we removed 24 contracts from our sample valued at \$303 million, thus bringing the final sample selection to 71 contracts valued at \$2.6 billion. The sample size of 71 was deemed sufficient for audit purposes.

To obtain a broader view of CPARS compliance and training, we sent out a survey to all DOT staff who had access to CPARS at the time of our audit. We developed the survey's 10 questions and tested them internally in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Guide on the Inspector General Empowerment Act's Exemption to the Paperwork Reduction Act*. We used SurveyMonkey to administer our survey. The survey respondent universe consisted of 246 emails from DOT staff who had access to CPARS. A total of 18 email addresses from the original survey were returned as undeliverable. After removing these emails, our final universe size was 228. There were 90 respondents for a final response rate of 39.5 percent. Our response rates varied by question because we did not require respondents to answer all the questions and consolidated some responses.

Exhibit B. Organizations Visited or Contacted

Department of Transportation

Federal Aviation Administration

Federal Highway Administration

Federal Motor Carrier Safety Administration

Federal Railroad Administration

Federal Transit Administration

Great Lakes St. Lawrence Seaway Development Corporation

Maritime Administration

National Highway Traffic Safety Administration

Office of the Secretary

Office of the Senior Procurement Executive

Pipeline and Hazardous Material Safety Administration

Volpe National Transportation Systems Center

Other Organizations

CPARS Customer Support Desk

Exhibit C. List of Acronyms

AFP	Alternative Focal Point
AMS	Acquisition Management System
AO	Assessing Official
AOR	Assessing Official Representative
CO	Contracting Officer
COR	Contracting Officer Representative
CPARS	Contractor Performance Assessment Reporting System
CR	Contractor Representative
DAU	Defense Acquisition University
DoD	Department of Defense
DOT	Department of Transportation
FAA	Federal Aviation Administration
FAR	Federal Acquisition Regulation
FHWA	Federal Highway Administration
FMCSA	Federal Motor Carrier Safety Administration
FP	Focal Point
FPDS-NG	Federal Procurement Data System-Next Generation
FRA	Federal Railroad Administration
FTA	Federal Transit Administration
GAO	Government Accountability Office
GLS	Great Lakes St. Lawrence Seaway Development Corporation
MARAD	Maritime Administration
NHTSA	National Highway Traffic Safety Administration
OA	Operating Administration
OIG	Office of Inspector General
OMB	Office of Management and Budget
OSPE	Office of the Senior Procurement Officer
RO	Reviewing Official

TAM
Volpe

Transportation Acquisition Manual
Volpe National Transportation Systems Center

Exhibit D. Major Contributors to This Report

DARREN MURPHY	PROGRAM DIRECTOR
ANN WRIGHT	PROJECT MANAGER
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WILLIAM SAVAGE	IT SPECIALIST
GEORGE ZIPF	CHIEF STATISTICIAN

Exhibit E. CPARS and Contracting Roles and Responsibilities

Position	Description
Department POC	Department POC positions must be filled by Government employees and are typically a senior procurement analyst in the Department's procurement policy office. They are responsible for administrative oversight of the evaluation process. Their duties include, but are not limited to, obtaining CPARS access, assigning Agency POCs and FPs, and approving the deletion of an evaluation. It is also a best practice for Department POCs to monitor CPARS to ensure the process is effectively implemented and reporting requirements complied with.
Agency POC	Agency POC positions must be filled by Government employees and are typically a procurement analyst in the Agency's procurement policy office. Their duties include, but are not limited to, contacting the Department POC for access to CPARS, authorizing FPs, and providing metrics for management. It is also a best practice for Agency POCs to evaluate quality and compliance metrics and provide assistance to FPs (e.g., training, monitoring, and policy).
Focal Point (FP)	FP positions must be filled by Government employees and they provide overall support for the process by registering contracts, setting up and maintaining user accounts, and assisting users on general matters. Their duties include, but are not limited to, registering contracts within 30 days of award using CPARS's Auto Registration function or manual entry, assigning access to Government and contractor personnel, and monitoring overdue evaluations. It is also a best practice for FPs to ensure all users are properly trained and system access does not result in or appear to be a conflict of interest.
Assessing Official (AO)	AO positions must be filled by Government employees and they are responsible for contracting or overall program execution. They also prepare, review, sign, and process evaluations within 120 calendar days after the end of the performance period. AO duties include, but are not limited to, ensuring contracts are registered, reviewing AORs evaluation information, forwarding evaluations to contractors, reviewing contractor comments, and forwarding evaluations to ROs when there is a contractor disagreement or request.
Assessing Official Representative (AOR)	AOR positions must be filled by Government employees and are typically assigned from the technical, functional, quality assurance, program management, or contracting offices. Their duties include registering contract information manually within 30 calendar days after award and providing timely, accurate, quality, and complete narratives.
Contractor Representative (CR)	CR positions are not filled by Government employees and they have the authority to review, comment, and return evaluations to the AO within 60 calendar days and request a RO review.
Reviewing Official (RO)	RO positions must be filled by Government employees and they provide the check-and-balance when there is a disagreement between the AO and CR. The RO signs the evaluation when the contractor indicates non-concurrence. RO duties also include, but are not limited to, providing narrative comments to supplement those of the AOs.

Note: While the CPARS Guide and Manual (exhibits E and F) generally use the term "evaluation" versus "assessment," other criteria documents cited in this report (such as the FAR and AMS) use the terms interchangeably. Thus for consistency, we elected to use "assessment" throughout most of this report.

Source: CPARS Guide, April 2022

Exhibit F. Basic Steps in the CPARS Process

Step	Description
Step 1 Contract Registration	FPDS-NG provides basic contract award information, such as contractor name, contractor address, product/service code, dollar value, and date signed, into CPARS. The FP or an alternate FP may complete contract registration by using CPARS's Auto Register function or manual entry. The registration should be performed within 30 days following contract award.
Step 2 Enter Proposed Ratings	The AOR and AO enter their proposed ratings and narratives into CPARS to reflect contractor's performance during the reporting period. The AORs should coordinate to ensure that all proposed ratings and narratives have been entered prior to submitting the proposed evaluation to their AO.
Step 3 Validate Proposed Ratings	The AO reviews the proposed ratings and verifies that the narratives are detailed, comprehensive, complete, accurate, and supported by objective evidence wherever possible. Then the AO signs the evaluation and sends it to the CR.
Step 4 Contractor Comments	The CRs being evaluated provide comments on the evaluation, indicating if they concur or do not concur with the evaluation. Then they sign and return the evaluation to the AO. The CR has a total of 60 days following the AO's evaluation signature date to send comments. If comments are sent within the first 14 days following the AO's signature date the AO or RO closes the evaluation, the evaluation will become available to source selection officials within 1 day. On day 15, the evaluation will become available for source selection with or without CR comments and whether or not it has been closed by the AO or RO. If the CR does not send comments and the evaluation has not been closed, it will be marked as "pending." If the CR sends comments at any time prior to 61 days following the AO's evaluation signature date, those comments will be reflected within 1 day. On day 61 following the AO's evaluation signature date, the CR will be "locked out" of the evaluation and may no longer send comments.
Step 5 Review Contractor Comments	The AOs review CR comments and can either: (1) close evaluations, which is only possible after the contractor concurs; (2) modify and close the evaluation; (3) send the evaluation to the RO; or (4) modify and send the evaluation to the RO. On day 61, after the AO's evaluation signature date, the system returns the evaluation to the AO and the CR may no longer send comments. If the AO closes the evaluation or modifies and closes it, the system updates the evaluation within 1 day and removes the "pending" marking. If the AO sends the evaluation to the RO or modifies the evaluation and sends it to the RO, the system updates the evaluation within 1 day and retains the "pending" marking.
Step 6 Reviewing Official (RO) Comments	The ROs (if applicable) review AO's ratings and CR's associated responses when CRs do not concur with AO evaluations and when AOs send evaluations to ROs for closure. The ROs should provide comments, sign assessments, and close them. When the RO closes an assessment, the system updates it within 1 day and removes the "pending" marking. Also, ROs can return the evaluation to AOs to make additional changes. In such a case, an AO should make the necessary changes, re-send the evaluation to the RO, and the RO should provide comments, sign the evaluation, and then close it. After the RO completes step 6, the evaluation is complete.

Source: CPARS User Manual, April 2022

Exhibit G. Contract Registration Timeliness in CPARS, FY 2017–2020

Operating Administration	Number of Procurement Actions	Number Meeting 30-day Requirement	Percent Meeting the 30-Day Requirement	Average Days for Contract Registration
FAA	22	0	0%	647
FHWA	40	19	47.5%	115
FMCSA	3	0	0%	169
FRA	4	0	0%	826
FTA	6	0	0%	850
GLS	2	0	0%	823
MARAD	4	0	0%	381
NHTSA	4	3	75.0%	41
OST	12	1	8.3%	448
PHMSA	11	0	0%	285
Volpe	12	8	66.7%	40
DOT-wide	120	31	25.8%	421

Source: OIG Analysis of sampled procurement actions covering fiscal years 2017–2020

Exhibit H. Contract CPARS Assessment Timeliness, FY 2017–2020

Operating Administration	Number of Assessments Reviewed	Number Meeting 120-day Timeframe	Percent Meeting the 120-Days	Average Days To Complete
FAA*	31	7	22.6%	332
FHWA	50	14	28.0%	336
FMCSA	4	0	0%	837
FRA	6	0	0%	665
FTA	13	0	0%	831
GLS	2	0	0%	922
MARAD	12	3	25.0%	385
NHTSA	10	3	30.0%	395
OST	18	0	0%	636
PHMSA	11	1	9.1%	466
Volpe	23	5	21.7%	283
DOT-wide	180	33	18.3%	553

* FAA's AMS established a 60-day requirement for completing CPARS assessment. Based on this timeframe, only 6 percent of the sampled assessments were in compliance.

Source: OIG analysis of the 180 assessments in our sample covering fiscal years 2017–2020

Exhibit I. Changes in 120-Day CPARS Assessment Compliance Rates After DOT Established Targets

Operating Administration	October 2020 ^a			July 2022 ^b			
	Contracts Completed	Contacts Requiring Assessments	Assessments Completed	Contracts Completed	Contracts Requiring Assessment	Assessments Completed	Met 90-percent Goal
FAA	196	3,781	5.2%	377	587	64.2%	No
FHWA	1,379	2,351	58.7%	1,881	2,023	93.0%	Yes
FMCSA	54	105	51.4%	84	93	90.3%	Yes
FRA	21	329	6.4%	52	305	17.0%	No
FTA	54	365	14.8%	308	366	84.2%	No
GLS	10	46	21.7%	31	37	83.8%	No
MARAD	36	373	9.7%	73	349	20.9%	No
NHTSA	69	463	14.9%	101	385	26.2%	No
OST	9	362	2.5%	340	360	94.4%	Yes
PHMSA	86	123	69.9%	110	119	92.4%	Yes
Volpe	122	133	91.7%	105	114	92.1%	Yes
DOT-wide	2,036	8,431	24.1%	3,462	4,738	73.1%	N/A

^a We used rates from October 2020 Compliance Metrics Report as a baseline for our analysis.

^b We compared compliance rates from July 2022 to the October 2020 baseline.

Source: OIG Analysis

Appendix. Agency Comments



**U.S. Department of
Transportation**
Office of the Secretary
of Transportation

Memorandum

Subject: Management Response to the Office of Inspector General’s (OIG) Draft Report – DOT Faces Challenges in Meeting Federal CPARS Reporting Guidance

From: Willie H. Smith
Senior Procurement Executive
Office of the Assistant Secretary for Administration

WILLIE HERBERT SMITH

Digitally signed by WILLIE
HERBERT SMITH
Date: 2023.01.30 17:03:23 -05'00'

To: Carolyn J. Hicks
Assistant Inspector General for Acquisition and Procurement

The U.S. Department of Transportation (“Department” or “DOT”) is committed to timely and quality reporting of contractor past performance information in support of Government-wide efforts to select competent and qualified contractors to satisfy Government requirements. In support of these objectives, beginning in fiscal year (FY) 2021, the Department issued a series of guidance aimed at improving timely reporting and quality of past performance assessments entered into the Contractor Past Performance Assessment Reporting System (CPARS). In addition to our commitment to maintaining relevant policy and training requirements, we have several efforts underway or completed to further improve the oversight and management of the Department’s past performance reporting improvement efforts, including the following:

- Beginning in FY 2021, issued a series of DOT DASH guidance documents that established timely reporting compliance targets and training requirements to improve quality of past performance assessments. In January 2023, DOT issued its FY 2023 DOT DASH guidance to support the Department’s continued commitment in these areas as well as other areas identified in Office of the Inspector General’s draft report;
- Provided at least semi-annual performance metrics on timely past performance reporting compliance with OSPE-established targets;
- Enhanced Department-level oversight of OA CPARS compliance via DOT’s Procurement Management Review (PMR); and
- Provided dedicated training on policy updates and strategies to improve CPARS reporting compliance to the acquisition workforce during the 2021 and 2022 Annual Acquisition and Financial Assistance Conferences.

Based on our review of the draft report, the Department concurs with all recommendations, as written, and plans to complete actions to implement each of the recommendations by December 30, 2023.

We appreciate the opportunity to comment on OIG’s draft report. If you have any questions, please contact Gibran Mills, Acting Associate Director, Acquisition Policy, Oversight & Business Strategies at 202-366-4974.

U.S. Department of Transportation
Office of Inspector General

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