U.S. DEPARTMENT OF TRANSPORTATION
OFFICE OF INSPECTOR GENERAL

FAA Faces Challenges in Tracking Its Acquisition Workforce and Ensuring Compliance With Training, Certification, and Warrant Requirements

FAA

FAA Faces Challenges in Tracking Its Acquisition Workforce and Ensuring Compliance With Training, Certification, and Warrant Requirements

Self-initiated

Federal Aviation Administration | ZA2021037 | Sept 27, 2021

What We Looked At

Between fiscal years 2013 and 2018, the Federal Aviation Administration (FAA) awarded over $17 billion in contracts. Within FAA, three key categories of acquisition professionals work together to award and manage contracts critical to meeting the mission of the agency: Contracting Officers (COs), Contracting Officer's Representatives (CORs), and Program/Project Managers (P/PMs). However, our prior work has raised concerns about the adequacy of FAA's acquisition workforce certification and warrant practices. Given the importance of a high-performing acquisition workforce in managing FAA's multibillion-dollar contract budget, we conducted this audit. Specifically, our audit objective was to assess FAA's oversight and compliance with Federal and Agency requirements for acquisition workforce training, certification, and warrants.

What We Found

FAA faces challenges in tracking its acquisition workforce and ensuring compliance with training, certification, and warrant requirements. First, FAA lacks effective processes for identifying, tracking, and assessing its acquisition workforce. For example, FAA relies on six separate information systems to identify and track its COs, CORs, and P/PMs, making it difficult to ensure the accuracy and completeness of the Agency's workforce-related data. In addition, until recently, FAA had been using the Federal Acquisition Institute's Acquisition Training System (FAITAS) as its system of record for tracking whether acquisition professionals have required certifications. Yet, more than 5 years after adopting FAITAS, FAA did not fully implement nor ensure its use. Second, FAA does not ensure its acquisition workforce meets all certification and warrant requirements. For example, FAA grants COs varying levels of warrant authority authorizing them to obligate funds on the Government's behalf. However, we found that 6 of 46 COs were assigned to contracts without the required certification level to support their warrant. Further, almost half the CORs in our sample (32 out of 69) were uncertified and yet had been assigned to contracts totaling $184 million. As a result, FAA may be putting Federal funds at risk by allowing its acquisition workforce to manage contracts without the experience, training, and certifications required to manage highly complex, costly, and mission-critical acquisitions.

Our Recommendations

FAA concurred with our eight recommendations to improve its oversight and compliance with certification, training, and warrant requirements for COs, CORs, and P/PMs. We consider all recommendations resolved but open pending completion of planned actions.

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Memorandum

Date: September 27, 2021

Subject: ACTION: FAA Faces Challenges in Tracking Its Acquisition Workforce and
                   Ensuring Compliance With Training, Certification, and Warrant Requirements |
                   Report No. ZA2021037

From: Mary Kay Langan-Feirson
                   Assistant Inspector General for Acquisition and Procurement Audits

To: Federal Aviation Administrator

Between fiscal years 2013 and 2018, the Federal Aviation Administration (FAA) awarded over $17 billion in contracts, representing 68 percent of the Department of Transportation's (DOT) total contract obligations during that time.[1] FAA shares the Governmentwide challenge of attracting and retaining talented and trained individuals who can plan, manage, and oversee contracts to ensure that agencies obtain the best value for their mission-critical goods and services. Within FAA, three key categories of acquisition professionals work together to award and manage contracts critical to meeting the mission of the agency: Contracting Officers (COs), Contracting Officer's Representatives (CORs), and Program/Project Managers (P/PMs).[2] These COs, CORs, and P/PMs are essential to acquiring FAA's technologies, services, and systems that enable the Nation to continue to benefit from safe and efficient air travel as well as foster a healthy aviation industry. A recent RAND Corporation report indicated a highly skilled acquisition workforce enables rapid acquisition and risk mitigation and can lead to technological innovation.[3]

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[1] Data based on action obligation totals from the Federal Procurement Data System (FPDS) from October 1, 2012, to August 31, 2018.

[2] These are only 3 of the 12 acquisition professions included in FAA's Acquisition Workforce. These three professions made up approximately 64 percent of FAA's acquisition workforce in 2018. The Contracting Officer is the only profession that awards the contract.

[3] RAND Corporation, *Strategies for Acquisition Agility: Approaches for Speeding Delivery of Defense Capabilities,* August 28, 2020. The U.S. Air Force commissioned this report.

Our prior work has raised concerns about the adequacy of FAA's acquisition workforce certification and warrant[4] practices, including the methodology for determining which employees are in the acquisition workforce, controls to ensure training requirements are met, and the Agency's adherence to previous Acquisition Workforce Plans.[5] Given the importance of a high-performing acquisition workforce in managing FAA's multibillion-dollar contract budget, we conducted an assessment of FAA's certification and warrant processes for COs, CORs, and P/PMs. Our audit objective was to assess FAA's oversight and compliance with Federal and Agency requirements for acquisition workforce training, certification, and warrants.

We conducted this audit 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 Department of Transportation representatives during this audit. If you have any questions concerning this report, please call me at (202) 345-2619 or Darren Murphy, Program Director, at (206) 255-1929.

cc: The Secretary
DOT Audit Liaison, M-1
FAA Audit Liaison, AAE-100

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[4] COs are granted varying levels of warrant authority—based on the dollar and scope limits of contracts—authorizing them to make awards and obligate funds on the Government's behalf.

[5] *FAA Policies and Plans Are Insufficient To Ensure an Adequate and Effective Acquisition Workforce* (Office of Inspector General [OIG] Report No. ZA2011148), August 3, 2011. OIG reports are available on our website: https://www.oig.dot.gov/.

Results in Brief

FAA faces challenges in tracking its acquisition workforce and ensuring compliance with training, certification, and warrant requirements.

The specific challenges facing FAA include the following:

FAA lacks effective processes for identifying, tracking, and assessing its acquisition workforce. According to guidelines from the Office of Management Budget (OMB) and other Federal entities, a key component of managing an agency's acquisition workforce is effectively identifying and tracking its key personnel. However, we found that FAA lacks an effective process for identifying and tracking its workforce and instead relies on six separate, standalone information systems to identify and track its COs, CORs, and P/PMs, resulting in various challenges in ensuring the accuracy and completeness of the Agency's workforce-related data. For example, FAA currently uses its Purchase Request Information System (PRISM) to track its CORs. However, the PRISM data are not always current, and FAA officials acknowledged that they could only provide us with a partial listing of the Agency's CORs. At the same time, FAA has been using the Federal Acquisition Institute's Acquisition Training System (FAITAS) as its system of record for tracking whether acquisition professionals have their required certifications (discussed in further detail below). Yet, more than 5 years after adopting FAITAS, FAA did not fully implement nor ensure its use among the Agency's acquisition workforce. FAA recently transitioned to Cornerstone On-Demand (CSOD), which replaced FAITAS as the Governmentwide acquisition workforce career management system.[6] However, FAA may face some of these same problems as well as additional challenges as it works toward making full use of the new system. As a result, FAA lacks a full picture of its acquisition professionals—limiting its ability to oversee the adequacy of its workforce for managing its multibillion-dollar acquisition portfolio. We also found that FAA does not include acquisition- and/or certification-related metrics in the performance standards for its CORs and P/PMs. The Office of Federal Procurement Policy (OFPP)[7] has identified performance metrics as a best practice to ensure successful contract management. Until these are established, FAA may not be adequately measuring the performance or qualifications of its acquisition professionals who are responsible for managing the Agency's contracts and major programs.

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[6] As of May 14, 2021, the Federal Acquisition Institute (FAI) began transferring training and certification records to the Defense Acquisition University's CSOD, a cloud-based commercial management system. The transition to CSOD was completed in June 2021.

[7] OFPP plays a central role in shaping the procurement policies and practices that Federal agencies use to acquire the goods and services they need to carry out their responsibilities.

FAA does not ensure its acquisition workforce meets all certification and warrant requirements. FAA requires COs, CORs, and P/PMs to apply for, acquire, and maintain Federal acquisition and FAA Specialization certifications appropriate for the type of contracts or program they manage. FAA also requires that COs meet certification requirements in order to hold a warrant. These requirements are intended to help ensure COs have the required expertise to manage FAA's acquisition programs. However, FAA does not consistently maintain compliance with its own policies and requirements. For example, we found that 6 of 46 COs were assigned to contracts without the required certification level to support their warrant. We also identified both CORs and P/PMs who did not meet FAA's certification requirements. Almost half the CORs in our sample (32 out of 69) were uncertified and yet had been assigned to contracts totaling $184 million. In addition, all 23 P/PMs in our sample who were assigned to OMB Major Programs[8] were missing some or all the required education, experience, and/or training documentation, and none of them had Federal Acquisition Certification (FAC)-P/PM Information Technology (IT) Certification as FAA's guidance requires. As a result, FAA may be putting Federal funds at risk by allowing its acquisition workforce to manage contracts without the education, experience, training, and certifications required to manage highly complex, costly, and mission-critical acquisitions.

We are making recommendations to improve FAA's oversight and compliance with certification, training, and warrant requirements for COs, CORs, and P/PMs.

Background

In April 2005, OMB issued a policy letter[9] that established a Governmentwide framework for creating a skilled Federal acquisition workforce. Specifically, OMB required the Federal Acquisition Institute (FAI)[10] to develop a Federal acquisition certification program, which it completed in January 2006.[11] While FAA has its

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[8] OMB Major Programs are investments or acquisitions that require special management attention because of their importance to the mission or function of the agency.
[9] OMB Policy Letter 05-01. April 15, 2005.
[10] FAI was established in 1976 under the Office of Federal Procurement Policy Act to foster and promote the development of the Federal acquisition workforce.
[11] OMB Policy Letter 05-01. OMB required FAI to develop a Federal acquisition certification program no later than January 1, 2006.

own Acquisition Management System (AMS),[12] the Agency elected to align its acquisition workforce certification requirements with FAI's certification program in 2014.[13] This program includes various levels of certification that were established to help ensure its acquisition professionals, including its COs, CORs, and P/PMs, have the training and experience commensurate with the size and complexity of the contracts or programs being managed. COs also are granted varying levels of warrant authority—based on the dollar and scope limits[14] of contracts—authorizing them to make awards and obligate funds on the Government's behalf.

Within FAA, four key organizations play a critical role in ensuring the Agency's acquisition workforce professionals are sufficiently trained, certified, and warranted:

- **Acquisition and Business Services (ACQ).** The ACQ is led by FAA's Acquisition Executive (FAE), who oversees FAA's AMS, issues warrants to qualified COs, and is responsible for developing and maintaining an acquisition career management program to ensure FAA's acquisition workforce is competent and able to accomplish its mission.

- **Acquisition and Contracting (AAQ).** The AAQ—which is within ACQ—is led by FAA's Director of Acquisition and Contracting. This office is responsible for assigning COs to contracts, among other responsibilities.

- **Acquisition Career Management Division.** The Acquisition Career Management Division—which is within ACQ—is led by the Acquisition Career Manager (ACM).[15] This office is responsible for both acquisition profession certification programs and acquisition training development and delivery.

- **Program Management Organization (PMO).** The PMO, which is located in FAA's Air Traffic Organization, was established in 2011 to improve the Agency's oversight and management of its major airspace programs (e.g., Next Generation Air Transportation System (NextGen)). The PMO assigns

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[12] In 1995, Congress enacted Pub. L. No. 104-50 (codified at 49 U.S.C. § 40110), which allows FAA to follow a different set of acquisition policies from the rest of the Department, and produce its own AMS. This law empowered the FAA Administrator to establish AMS without requiring compliance with most Federal acquisition laws and exempted FAA from having to follow the Federal Acquisition Regulation (FAR), as well as guidance from OMB's OFPP.

[13] FAA's 2014 Acquisition Workforce Plan states FAA enhanced its certification program requirements for all acquisition workforce professions to meet evolving workforce needs and to align with FAI program changes.

[14] FAA follows AMS in issuing its warrants, whereas the rest of DOT uses the FAR. At DOT, unlimited warrant authority is required for contracts above $20 million, whereas at FAA under AMS unlimited warrant is required for contracts above $50 million.

[15] ACMs are appointed by the Agency's head of contracting to lead its acquisition career management program.

P/PMs to major programs and works with the ACM to ensure they have the necessary training and certifications to effectively manage FAA's major airspace investments.

According to AMS, the FAE appoints an ACM to monitor and report compliance with the acquisition career management program. This program was developed to support FAA's Acquisition Certification Policy, which established professional development requirements and competency standards across the Agency's acquisition disciplines. Further, supervisors of acquisition professionals are responsible for making sure their employees have the needed competencies and meet all the certification requirements to perform at the level required for their current position.[16] While supervisors play an integral role in ensuring their workforce is properly trained and certified, the ACM is primarily responsible for monitoring CO, COR, and P/PM compliance with FAA's acquisition career management program.

FAA's acquisition workforce report[17] has 12 identified professions,[18] 3 of which have primary responsibility for awarding and administering contracts or programs: COs, CORs, and P/PMs. COs are the only members of the workforce who have the authority to obligate the Government—by executing, modifying, or terminating contracts. COs must act within the scope of their delegated authority, or warrant, to enter into contracts, leases, or other agreements. CORs assist COs in monitoring contracts and overseeing contractor performance by interpreting processes, procedures, and requirements; providing technical direction; and resolving technical issues. P/PMs establish, track, manage, and report all aspects of program/project planning and execution (see table 1).

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[16] AMS *Policy Section 5.5, Acquisition Career Program, Responsibilities.*

[17] Each year, FAA publishes an annual acquisition workforce report, which provides data on FAA's continued development of its acquisition workforce. Past reports have been titled Acquisition Workforce Plans from 2012 to 2014, Acquisition Workforce Strategies from 2015 to 2017, and Acquisition Workforce Profile in 2018 to 2020.

[18] According to FAA's 2020 annual acquisition workforce report, the 12 professions are: Leadership, Program/Project Management, Research and Engineering, Test and Evaluation, Financial Management, Contracting, Realty Specialist, Contracting Officer's Representative, Quality Reliability, Acquisition Law, Integrated Logistics Support Specialists, and Specialized Support.

Table 1. Roles and Responsibilities of COs, CORs, and P/PMs

Position	Roles and Responsibilities
Contracting Officer (CO)	Obligate funds on behalf of the Government, and manage all processes and procedures involved in establishing and maintaining contractual relationships between FAA and its external suppliers
Contracting Officer Representative (COR)	Help resolve technical issues, give technical direction to the contractor, and interpret technical processes and procedures for the CO
Program/Project Manager (P/PM)	Oversee the development and implementation of projects/programs to ensure they are delivered on-time, on budget, and to specification

Source: FAA's Acquisition Workforce Profile

Although FAA's certification and warrant requirements for these professionals are similar to Federal standards, the Agency tends to be more prescriptive— providing more explicit and in-depth certification requirements for all levels for COs, CORs, and P/PMs. As such, FAA requires COs, CORs, and P/PMs to attain both the FAC certification, as well as an FAA Specialization. The latter can be attained only after the FAC certification requirements are met and can include additional AMS-related training courses, years of experience, and/or leadership requirements.

During the course of our audit, FAITAS was FAA's system of record for acquisition certifications. FAITAS is an integrated and Governmentwide acquisition workforce career management system that allows agencies to manage their acquisition workforce member certifications and related training records. Upon creating a profile in FAITAS, acquisition professionals could then register for acquisition training courses and apply for and manage their FAC and FAA certifications. The approval process for these certification applications included the employee's first-level supervisor and FAA's ACM and FAE.

On May 15, 2020, FAI announced plans to transition from FAITAS to a new system called Cornerstone OnDemand (CSOD), which is hosted by the Defense Acquisition University (DAU). As part of the migration, FAI and DAU worked together to transfer user profiles and data, from FAITAS to the new system, which was completed in June 2021. Our findings are tied to FAITAS, which was the acquisition career management system FAA used when we conducted our field

work. However, the recently implemented CSOD has different capabilities[19] that will eventually require Federal agencies—including FAA—to adapt their processes and data systems. Still, neither the change in systems nor the differing capabilities affected our audit findings or resulting recommendations.

FAA Faces Challenges in Tracking Its Acquisition Workforce and Ensuring Compliance With Training, Certification, and Warrant Requirements

The Agency lacks effective processes for identifying, tracking, and assessing its acquisition workforce. Because FAA uses multiple standalone systems for this work and did not fully implement its system of record, it is difficult for the Agency to maintain accurate data on these employees. Furthermore, FAA does not fully comply with its own or Federal training, certification, and warrant requirements for acquisition staff.

FAA Lacks Effective Processes for Identifying, Tracking, and Assessing Its Acquisition Workforce

FAA's acquisition workforce plays a key role in helping acquire needed National Airspace System (NAS) technologies, services, and systems—all of which are essential in helping maintain safe, efficient air travel as well as foster a healthy aviation industry. Yet our review found significant weaknesses in FAA's ability to track its acquisition workforce and verify that training and certification requirements have been met. We also found weaknesses in how FAA assesses the performance and qualifications of its CORs and P/PMs in managing FAA's contracts and programs.

FAA Uses Multiple Standalone Information Systems to Identify and Track Its Acquisition Workforce

A key component of managing an agency's acquisition workforce is having an effective process for identifying and tracking its key personnel. This need has

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[19] In contrast with FAITAS, CSOD currently includes a limited approval process for certifications (i.e., one level versus multiple levels) and does not process all continuous learning points (CLP) for acquisition professionals seeking to maintain their certification. Moreover, historical records (resumes and external training certificates) were not transferred during the initial migration.

been emphasized in various Federal policies, including OMB's 2005 policy letter, which directed ACMs to maintain and manage data on their respective agency's acquisition workforce. Likewise, in 2013, OFPP directed each civilian agency to collect and maintain standardized information to ensure the acquisition workforce was effectively managed. OFPP also required agencies to have accurate and complete records of COs, CORs, and P/PMs in FAITAS by January 1, 2014. However, despite these Federal policies, FAA lacks an effective process for collecting and maintaining complete and accurate information on its acquisition workforce.

According to FAA officials, the agency's process for tracking its acquisition workforce is documented in several standard operating procedures (SOP). However, these SOPs only mention two information systems, FAITAS and the Federal Personnel Payroll System (FPPS). FAA also relies on four other standalone information systems to track its acquisition workforce (see table 2). Each system contains a variety of information, which FAA uses to extract the names, certification and warrant levels, and contracts or programs associated with the Agency's acquisition personnel.

Table 2. Information Systems Used by FAA To Identify and Track Its Acquisition Workforce

Information System	Description	Types of Acquisition Workforce Data Tracked	FAA Office Overseeing System
Federal Acquisition Institute Training Application System (FAITAS)	A Governmentwide online registration system for acquisition workforce training and certification.[a]	Certifications and related acquisition training records of COs, CORs, and P/PMs	Acquisition Career Management Division
Federal Personnel Payroll System (FPPS)	Personnel and payroll system used to create and generate the full life cycle of personnel transactions, enabling agencies to maintain employee records electronically.	Acquisition workforce members	Human Resource Services Division (HRSD)
Corporate Investment Management System (CIMS)	An Oracle database used to track P/PMs working on OMB Major Programs. The tool includes information on who is assigned to particular programs and characteristics of the program.	P/PMs working on OMB Major Programs	Capital Planning and Investment Control (CPIC)
Knowledge System Network (KSN)	The Acquisition Professional Portal (APP) within FAA's Knowledge Service Network (KSN) allows managers to request and track warrants.	CO warrants, warrant applications, and warrant status	Acquisition Career Management Division

Information System	Description	Types of Acquisition Workforce Data Tracked	FAA Office Overseeing System
Purchase Request Information System (PRISM)	FAA's comprehensive procurement management system.	CORs (only if assigned to a contract)	PRISM Service Branch, Financial Operations Division
Simplified Program Information Reporting and Evaluation (SPIRE)	An automated database used by various FAA offices to report program data, including monthly schedule status, cost and financial information, and assigned P/PMs. FAA, in turn, uses SPIRE to validate those P/PMs assigned to OMB Major Programs.	P/PMs assigned to OMB Major Programs	Office of Budget & Programs (ABP)

[a] In June 2021, CSOD replaced FAITAS as FAA's acquisition workforce career management system.

Source: OIG analysis of FAA and other governmental information

Because FAA uses six separate information systems, it is difficult for the ACM to garner a complete picture of FAA's acquisition workforce. It also creates challenges and inefficiencies because the ACM does not have ready access to all the systems and data required for accurate tracking and updates. FAA officials acknowledged that the Agency could benefit from implementing a more effective process for tracking and overseeing its acquisition workforce.

Based on our review, the lack of an effective system has resulted in a number of issues, especially with respect to CORs and P/PMs, as illustrated by the following examples:

- *Contracting Officer Representatives.* PRISM is currently the main system FAA uses to identify its CORs. However, because PRISM is managed by a different FAA department—the Financial Operations Division—the ACM does not have ready access to the system and thus has limited ability to ensure the data are accurate. According to FAA, every few months the Financial Operations Division provides the ACM a list of CORs, generated from PRISM, and will follow up with CORs regarding certification, as needed. However, the PRISM data are not always current because CORs are not entered into the system until they are assigned to a contract. Further, according to FAA, there may be multiple CORs working on a contract, but only one COR may be listed in PRISM. As such, at any given time PRISM may not capture all individuals serving as CORs. For example, when we asked FAA for the full universe of its CORs, FAA officials acknowledged that they could not provide a complete list. Therefore, they

only provided a partial list of 2,464 CORs, as identified through PRISM.[20] By relying on PRISM reports instead of establishing a more effective process for tracking its acquisition workforce, FAA lacks the internal controls necessary to generate a complete and accurate list of all its CORs as well as ensure they comply with training and certification requirements.

- *Program/Project Managers*. At the time of our review, FAA could not identify or track all of its acquisition P/PMs. FAA stated that the Agency uses a combination of CIMS data reports—provided by FAA's Capital Planning and Investment Control (CPIC) group—as well as information obtained via email, phone, personal conversations, or SPIRE to track P/PMs assigned to OMB Major Programs. However, this process does not capture those acquisition P/PMs assigned to FAA's non-major programs. FAA officials stated they were only required to monitor P/PMs associated with OMB Major Programs to comply with OMB reporting requirements.[21] However, as part of the Agency's implementation of FAITAS, FAA's FAE required all acquisition P/PMs to create a profile in this system. Had FAA fully implemented the FAE's direction, the ACM would be better positioned to identify all P/PMs working on both OMB Major and non-major programs, which include a wide assortment of acquisitions involving the development of NAS systems and technologies. By not tracking those P/PMs assigned to non-major programs, FAA is unable to ensure these individuals have the requisite training and certification to effectively fulfill their responsibilities. After we brought this issue to FAA's attention, Agency officials told us that they began tracking all P/PMs starting in fiscal year 2020. FAA stated that, as a result, the Agency has now identified all of its P/PMs (for both major and non-major programs). However, we did not verify the extent to which this was accomplished because we only examined the P/PM data within the timeframe of our audit (i.e., fiscal years 2016, 2017, and 2018).

In contrast to its processes for identifying and tracking CORs and P/PMs, FAA relies on the Human Resources Services Division (HRSD) to identify the Agency's COs through the FPPS on a monthly basis. While these data may typically be one or two pay periods behind due to recurring updates to the system, the ACM told

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[20] According to FAA's 2019 Acquisition Workforce Profile, identifying CORs and tracking their compliance with training requirements can be challenging because the role of COR is often a collateral duty. Further, in prior years, only certified CORs were counted in the acquisition workforce. As a result, FAA lacked a complete picture of its CORs because it was not capturing its uncertified CORs as part of its acquisition workforce.

[21] According to OMB Circular A-11, Section 55, as part of the Federal budget and information technology portfolio oversight process, OMB requires Agencies to submit business cases to capture information on major investments (e.g., OMB Major Programs). Within the business case, Agencies identify the qualifications of the P/PM supporting an OMB Major Program.

us that they also receive updates from FAA management and HRSD officials and capture recent new hires and departures that may not be reflected in the FPPS data. While this process may be somewhat cumbersome, our review found it does provide a fairly accurate picture of the Agency's CO workforce.[22]

Still, the lack of an effective process to track and monitor its key acquisition professionals—especially its CORs and P/PMs—hinders FAA's ability to fully identify and therefore oversee its acquisition workforce. While FAA has been making strides to improve this process, more work remains for the Agency to obtain a full picture of its CORs and P/PMs—a key component to ensuring the Agency has the essential acquisition workforce to meet mission needs.

FAA Does Not Have an Effective Process for Assessing the Qualifications of Its Acquisition Workforce

OMB required all civilian agencies to use FAITAS as their primary system of record for acquisition training, maintaining acquisition certifications, and tracking continuous learning points (CLP) by October 1, 2014.[23] Although FAA was exempt from this requirement, FAA's FAE opted to implement FAITAS[24] as its sole system for processing certifications for its COs, CORs, and P/PMs. The Agency required these staff to create a FAITAS profile, even if they were not pursuing certification by September 18, 2015. This decision was further emphasized in 2017, when the FAA Acquisition Workforce Strategy[25] made it clear that FAITAS was the Agency's system of record for tracking and reporting on CO, COR, and P/PM certifications.

Starting in 2015, FAA began working with FAI to develop a process to migrate its acquisition workforce certifications to FAITAS. To conduct this migration, FAA required all acquisition workforce members to create a FAITAS profile to ensure their certification data[26] were accurately transferred and entered into the system. However, more than 5 years after adopting FAITAS, FAA did not fully implement this system nor enforce its use among its acquisition workforce. As a result, FAA continues to monitor its acquisition workforce and certifications using Excel spreadsheets. According to FAA's ACM, the spreadsheets are a vehicle for internal tracking, which provides a snapshot of the most current acquisition workforce

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[22] In comparison to the CORs (2,464), the COs (336) are easier to track due to a smaller workforce.

[23] OMB, *Increasing Efficiencies in the Training, Development, and Management of the Acquisition Workforce*, September 3, 2013.

[24] FAA's Acquisition Executive sent out a memo titled *Migration to Federal Acquisition Institute Training Application System (FAITAS) effective October 1, 2015* on September 4, 2015.

[25] The purpose and focus of the Acquisition Workforce Strategy is to provide information on FAA's acquisition workforce that supports the continued development of critical acquisition professions and competencies necessary to successfully manage FAA's acquisition objectives.

[26] FAA and FAI agreed that certification documentation was not required for upload into FAITAS when migrating an existing certification; only the date of the certification was recorded. If a certification had expired, then it had to be brought up to date before it could be recorded in FAITAS.

numbers and status of certifications. Data obtained from sources—such as FAITAS or FPPS—are compiled within the spreadsheets and used to verify the accuracy and currency of existing workforce records. The impact of not enforcing the consistent use of an effective process for tracking and reporting on its acquisition workforce's certifications has been significant—including the inability to assess whether the Agency's COs, CORs, and P/PMs have fulfilled the requisite training and certification requirements.

FAA has relied on its acquisition workforce to create and maintain FAITAS profiles, which was critical for tracking current certification levels. However, we found numerous instances where profiles had not been established or key documents had not been uploaded into FAITAS. For example, 12 of 31 FAA employees in our sample[27]—who were certified after the Agency's migration to FAITAS[28]—had profiles in the system but not the required documentation to support their certifications (see table 3). While FAA was able to provide us with the missing documentation, it took Agency officials more than 7 months to do so, as the supporting records were located outside of FAITAS. Examples of missing documents included baccalaureate degrees, training certificates (such as those relating to required AMS classes), evidence of developmental leadership activities, and prior FAC-C level certifications. FAA acknowledged that, in some instances, documentation may not have been uploaded in FAITAS when acquisition staff submitted their applications. Despite its own guidance and the FAE's requirement to use FAITAS, the Agency continued to allow its acquisition workforce members to maintain certification records outside of FAITAS. In doing so, FAA risked not being able to accurately identify whether its acquisition workforce meets certification and training requirements.

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[27] Five out of 8 COs, 3 out of 19 CORs, and 4 out of 4 P/PMs.
[28] FAA migrated to FAITAS on October 1, 2015.

Table 3. Missing Documentation of Acquisition Professionals
Certified After Migration to FAITAS

Acquisition Profession	Training	Experience/ Competency	Education	Leadership
CO	4 of 8	5 of 8	1 of 8	2 of 8
COR	2 of 3	1 of 3	N/A	N/A
PPM	3 of 4	2 of 4	N/A	N/A
Totals	9 of 15	8 of 15	1 of 8	2 of 8

Source: OIG analysis

Further, FAA will need to take additional steps to communicate its certification requirements to its workforce. One of the capabilities of FAITAS was the option for its users to send an electronic message to the ACM[29] to discuss any discrepancies within certification records or obtain additional support related to their profiles. During our review of these electronic messages, we found that some workforce members were not aware of certification requirements or the need to store training records in the system. For example, in the 38 messages to the ACM in FAITAS[30] that we reviewed, 31 CORs stated they were not aware of certification qualifications or the FAITAS application process. When we brought this to FAA's attention, the Agency said that it provides significant information on the FAITAS application process and certification requirements on the Agency's internal network[31]—which is available to its acquisition workforce. However, based on our review of the messages in FAITAS, this guidance may not have been sufficient to ensure that FAA's acquisition workforce understood what was needed to meet certification requirements, including the requirement to upload supporting documentation in support of those certifications. Moreover, now that FAA has transitioned from FAITAS to CSOD, the Agency will need to develop new guidance and training to ensure its acquisition workforce fully understands the various certification requirements and processes under the new system.

FAA's failure to ensure compliance with its own requirements for using FAITAS challenges its ability to ensure its acquisition staff have the required certifications

[29] Certification Managers support Federal acquisition certifications and continuous learning achievement requests. Their primary responsibility is to oversee the input and maintenance of information into FAITAS related to certifications and learning achievement requests.

[30] These 38 messages were judgmentally selected based on OIG access to email alerts from FAA's FAITAS account during calendar years 2019 and 2020.

[31] This information is maintained in the KSN Acquisition Professions Portal.

and experience commensurate with the acquisitions they manage and oversee. Given the incomplete data in FAITAS, the Agency may be similarly challenged to ensure the new CSOD system is effectively integrated and can be used to manage its acquisition workforce. As a result, FAA cannot fully ensure its acquisitions—with lifecycle investments in the tens of billions of dollars—are properly managed and executed by a skilled acquisition workforce.

FAA Does Not Include Acquisition- and Certification-Related Metrics in the Performance Standards for Its Acquisition Professionals

In 2018, DOT issued a memorandum[32] requiring all DOT supervisors to incorporate performance criteria into performance plans for P/PMs, CORs, and Project Officers[33] that support and are assigned to programs that meet specific criteria.[34] This memorandum resulted in part from the Governmentwide Program Management Improvement and Accountability Act of 2016 (PMIAA),[35] which recognizes the importance P/PMs, their collaboration with CORs, and the necessity of sound acquisition oversight. In May 2021, the Department issued the DOT Acquisition Directive (DAD), which superseded this memo and requires supervisors to incorporate mandatory performance elements for all CORs and P/PMs who are actively working on contracts, programs, and/or projects.[36] According to the DAD, performance plans for CORs must include the following elements: (1) delegated contract duties, (2) business partner relationship, and (3) timeliness of documents submitted to the contracting office. Similarly, performance plans for P/PMs must include the following elements: (1) program/project management duties (i.e., achieving and maintaining P/PM certification), (2) integrated product team management, and (3) obtaining program/project outcomes. Additionally, employees appointed as CORs or P/PMs are responsible for ensuring their performance plans include metrics for managing their assigned DOT programs and contracts.

According to DOT's Senior Procurement Executive (SPE), since P/PMs and CORs have multiple other duties not directly related to contracting, it is important for them to have specific criteria to evaluate their performance on Agency

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[32] *DOT Acquisition & Financial Assistance Workforce Performance Management Guide,* dated August 3, 2018.

[33] Both P/PMs and Project Officers are responsible for providing guidance, direction, oversight, and control for programs, and may also recommend, review, or approve acquisition requests and/or manage budget-related actions.

[34] DOT required that CORs and P/PMs have performance criteria in their performance plans if they are assigned to an acquisition that: (1) exceeds $20 million, or $10 million for "high risk" acquisitions; (2) exceeds roughly 20 percent of their overall workload; and/or (3) meets one or more of the significant or high risk factors for the following: sensitivity or complexity of what is being procured, number and location of performance sites, impact of delay, visibility, contract type/structure, and special considerations.

[35] Pub. L. No. 114-264 (2016).

[36] The DAD strengthened the previous 2018 DOT Memo by requiring all CORs and P/PMs to have specific performance elements in their performance plans.

acquisitions. Moreover, incorporating performance criteria into performance plans is also important because it ensures the right people with the necessary skills and experience levels are working on the Department's programs and helps ensure P/PM and COR qualifications are considered by multiple levels of the organization.

Since FAA has independent acquisition authority, it is not required to follow DOT policy regarding performance criteria for CORs and P/PMs or the PMIAA. Yet, according to an Agency official, FAA plans on implementing metrics as a result of the Governmentwide focus on accountability for COR-delegated duties. It also aims to improve the focus and emphasis on COR-related activities, although no target implementation date has been set. In comparison, another FAA official stated that performance metrics for P/PMs are already in place. However, these metrics do not address the three core elements defined in the DAD—the first of which involves ensuring P/PMs achieve and maintain proper certifications. Although FAA is exempt from the DAD, an FAA official stated they are considering adding performance metrics for P/PMs. Until FAA establishes performance and certification metrics for its CORs and P/PMs, the Agency may be missing opportunities to better assess and improve their performance and qualifications.

FAA Does Not Ensure Its Acquisition Workforce Meets All Training, Certification, and Warrant Requirements

From 2012 to 2018, FAA's annual acquisition workforce reports noted the Agency's ongoing challenges with its acquisition workforce, such as ensuring COs meet continuous learning requirements, verifying COR certifications, and reducing the time it takes to develop new P/PMs. Our review found evidence of some of these challenges, as well as other weaknesses.

FAA Does Not Always Enforce Its Own Certification Policy

AMS requires FAA's COs, CORs, and P/PMs to apply, acquire, and maintain Federal acquisition certifications developed by FAI. These acquisition certifications include a combination of acquisition-focused training, education, and experience. In addition, FAA's acquisition workforce Career Planning Guides[37] require that its acquisition workforce obtain FAA Specialization-certifications that

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[37] FAA's Career Planning, Development, and Resource Guide provides professional development information and resources for its COs, CORs, and P/PMs and includes information related to competencies, certification requirements, training, and developmental opportunities.

supplement FAI certificate requirements with AMS-specific training and that each CO, COR, and P/PM attain both a FAC certification and FAA Specialization.[38] To maintain these certifications, FAA's acquisition workforce must complete a set number of CLPs every 2 years in order to perform their acquisition role at FAA.[39]

However, FAA does not always enforce its policies and requirements for assigning certified acquisition professionals to work on contracts. During our review of the sampled contracts awarded between fiscal years 2016 and 2018, we found that 2 out of 46 COs and 39 out of 71 CORs who were assigned to a contract lacked one or both the FAI and FAA specialization certifications in FAITAS. When we asked FAA about these missing certifications, the Agency was unable to provide the necessary support for those COs and CORs in question (i.e., no valid certification at the time of award). Furthermore, FAA was not able to provide a list of those P/PMs working on the contracts in our sample, as they only track P/PMs by program not contract. As a result we could not verify their certifications.

These gaps in FAA's data occurred in part because FAA was not consistently using FAITAS, as required by its policy. Beyond the reasons previously discussed in this report, an FAA official noted that the delay in initially using FAITAS was due to Personally Identifiable Information (PII) concerns. Specifically, FAA did not initially require users to create FAITAS profiles—since some personnel were reluctant to enter their social security numbers into the system. Yet this information was needed in order to establish the users' FAITAS profiles. This same official noted that once the acquisition professionals' original 2-year certification periods[40] ended, FAA did require everyone to use FAITAS in accordance with the 2015 memo—regardless of any PII concerns an individual might have previously had.

FAA's decision not to enforce its certification policy—including the use of FAITAS—has significantly impacted its ability to ensure its acquisition workforce is properly trained and certified.

FAA's COs Are Not Always Certified at an Appropriate Level for Their Warrant Authority

According to AMS, warrants define the dollar and scope limitations of a CO's authority to award contracts on behalf of the Government. Warrants allow a CO to obligate the Government up to a specified dollar threshold. Also, according to AMS and FAA's Career Guides, in order to be certified and granted warranted authority at FAA, COs are required to attain both FAC-C and FAA Specialization certifications. AMS further outlines the three certification levels needed to

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[38] FAA's Career Guide states an individual must meet the FAC Certification requirements prior to receiving the FAA Specialization.

[39] Depending on the acquisition profession and certification level, CLP requirements range from 8 to 80 hours.

[40] To maintain a certification, a professional must meet a required number of CLP hours every 2 years. If the CLP hours are not met, then the certification expires and is revoked.

support a CO's warrant authority and the associated dollar thresholds (see table 4).

Table 4. CO Certification Levels, Requirements, and Warrant Threshold Authorities Effective Fiscal Years 2016–2018[a]

CO Certification Level	FAA's Requirements for FAC-C and FAA Specialization [b]	When Certification Is Required	Warrant Threshold Authority [c]	Certification Maintenance Required Every 2 Years
Level I	1 year of contract work experience within last 3 years Baccalaureate Degree or 24 semester hours Competency Experience Checklist 10 FAC-C and 2 FAA specific training courses (12 total courses)	Prior to achieving warrant authority	Up to $150,000	80 CLPs
Level II	Must meet Level I 2 years of contract work experience within last 5 years Baccalaureate Degree or 24 semester hours Competency Experience Checklist 8 FAC-C and 1 FAA specific training courses (9 total courses)	Prior to achieving warrant authority	Up to $10,000,000	80 CLPs
Level III	Must meet Levels I and II 4 years of contract work experience within last 10 years Baccalaureate Degree and 24 semester hours 2 developmental leadership activities Competency Experience Checklist 3 FAC-C and 1 FAA specific training courses (4 total courses)	Prior to achieving warrant authority	Greater than $10,000,000	80 CLPs

[a] The audit team reviewed certification requirements based on the year a CO was initially certified, ranging from 2010 to 2018. [b] FAI and FAA have updated these requirements effective fiscal year 2020. [c] FAA has six specific warrant threshold limits associated with the three certification levels: FAC Level I (up to $150,000); FAC Level II ($1 million, $5 million, and $10 million); and FAC Level III ($50 million and Unlimited).

Source: FAA Career Guides and AMS T3.1.4

AMS also notes that in order for COs to maintain their warrants, they must achieve the appropriate certification level commensurate with their delegated warrant threshold (see table 4). If an individual does not meet the established certification level requirements, FAA's FAE may rescind or modify their warrant or

certificate of appointment to decrease the dollar threshold of awards, modifications, and other contractual actions the CO may perform.

Our review identified various instances where COs did not have the appropriate certification level, as required by AMS,[41] to support their warrant authority. For example, in our acquisition workforce sample of 57 COs, 1 CO awarded 6 contracts with a combined original contract value of over $164.7 million without the appropriate certification to support their unlimited warrant authority. This CO has had a FAC-C Level II certification since 2004 and an unlimited warrant since 2006. When we brought this issue to FAA's attention, an Agency official stated the warrant level was determined by mission need and demonstrated experience. However, for the last 14 years, FAA has never required this CO to obtain FAC-C Level III certification, as required by the Agency's own guidance.

Likewise, 6 of the 46 COs in our contract sample awarded 10 contracts with a combined estimated value of $1.76 million without the appropriate certification to support their warrant authority. For example, two COs who awarded multiple contracts held unlimited warrants but only possessed a FAA Level II certification, although FAA's own guidance states that a Level III certification is required for an unlimited warrant. In addition, when one of these COs' existing FAC-C certification was revoked,[42] FAA did not to rescind the unlimited warrant until 10 months later.

When COs are granted a warrant, they are given the authority to bind the Government by awarding contracts that are aligned with their certification level, experience, education and skill set. However, FAA does not always ensure that its COs have the requisite certification to support their warrant authority or the appropriate warrant level to obligate Government funds. As a result, FAA may be placing Federal funds at risk by allowing unqualified COs to manage its contracts.

FAA CORs Are Not Always Properly Certified and Qualified to Manage Contracts

CORs provide technical expertise, oversee the technical work of a contractor, and ensure deliverables meet the requirements of the Government. CORs fulfill this duty by adhering to the terms of a contract, the law, and the limits of their delegated authority from the CO. FAA requires CORs to achieve and maintain both a Federal Acquisition Certification for Contracting Officer's Representatives (FAC-COR) and a FAA Specialization certification. These certifications include experience and training requirements. Once certified, each level of COR certification must be maintained by continuing learning hours every 2 years. The

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[41] AMS T.3.1.4 (A)(4)(b). Individuals must meet the training, education, and experience requirements for certification as outlined in AMS Policy Section 5 to qualify for a warrant.

[42] The CO's FAC-C was revoked due to a failure to obtain the required number of CLPs during the 2-year period.

certification level required to work as a COR on a contract is determined by FAA's Program Office and the CO. In determining the level of certification, the CO looks at a variety of factors, including contract sensitivity/complexity, location and sites of contract, visibility, contract type, and potential impact on delays. Moreover, COR Nomination Forms and Delegation Letters provide necessary documentation used to verify that CORs have the proper training, experience, and education to fulfill their duties and understand their responsibilities and authority. Level I and II CORs must be certified prior to their appointment on a contract, and a COR assigned to a contract that requires a Level III certification must be certified no later than 6 months after the appointment (see table 5). However, FAA does not ensure that its CORs meet these requirements.

Table 5. COR Certification Requirements, Fiscal Years 2016–2018[a]

COR Certification Level	FAA's Requirements to Achieve FAC-COR and FAA Specialization[b]	When Certification Is Required	Certification Maintenance Required Every 2 Years
Level I	Complete 1 of the 5 coursework options	Prior to working on a contract	8 CLPs
Level II	Minimum of 1 year of COR experience completing specific tasks Competency Experience Checklist Complete 1 of the 5 coursework options	Prior to working on a contract	40 CLPs
Level III	Minimum of 2 years of COR experience completing specific tasks Competency Experience Checklist Complete 1 of the 5 coursework options	Within 6 months of contract assignment	40 CLPs

[a] The audit team reviewed certification requirements based on the year a COR was initially certified, ranging from 2012 to 2018. [b] FAI and FAA updated these requirements in fiscal year 2020.

Source: FAA COR Career Guides and AMS T3.1.10

Furthermore, FAA does not effectively oversee whether CORs comply with all of the certification and training requirements noted in table 5. The training requirements are fulfilled by completing various FAA-specific courses that either fulfill or exceed the FAC-COR required training hours. At the time of our audit, in

order to apply for a certification, acquisition professionals were to complete an application in FAITAS. This application required CORs to submit documentation[43] to show certification requirements have been met, and then the application moved through several levels of approval within FAITAS. Moreover, as mentioned earlier in this report, the FAE required training documentation supporting a COR's certification to be stored in FAITAS.

FAA provided us a list of 2,464 CORS—of which we pulled a sample of 69. Within our sample of 69 CORs, 37 were certified and 32 were uncertified. From fiscal years 2016 to 2018, the 32 uncertified CORs worked on contract actions totaling over $184 million. Three CORs individually managed contract actions valued at more than $20 million without holding a COR certification.

FAA also does not effectively maintain documentation for some of those CORs who are certified. For example, we found that the FAITAS profiles for 2 of the 37 certified CORs were missing key certification, training, or experience documentation. When we asked FAA for the missing documentation, it took FAA about 4 months to provide the required documentation. While FAA was able to provide the certifications for these CORs, all supporting documentation had been stored outside of FAITAS—contrary to Agency policy. Additionally, even though FAA's COR certifications involve four levels of review, in these two cases Agency officials approved applications without ensuring all the required documents were in FAITAS.

In addition, FAA has conflicting guidance regarding COR certification approvals. While AMS states that the FAE is the approving official for all acquisition certifications—including COs, CORs, and P/PMs—the Agency's COR Career Planning Guide notes that the approval rests with the ACM. Due to this inconsistency, a number of CORs hold certifications but lack the FAE's approval, which is currently required by AMS. For instance, 26 of the 37 certified CORs in our sample did not have FAE approval of their certifications. When we presented this finding to FAA, Agency officials confirmed that the ACM has final approval of COR certifications and explained that AMS had not been updated to reflect the Agency's revised process. Based on this finding, FAA stated it plans to update AMS to clarify the ACM's authority to approve COR certifications.

These certification and training gaps occurred because FAA has not implemented a standard process for appointing its CORs to contracts. When we asked FAA officials to explain the process its COs use for nominating and delegating a COR to a contract, they stated FAA does not follow a formal process. While FAA developed a COR Appointment Process Chart, this chart has been in draft form

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[43] Certification applications require sufficient documentation to meet the training and experience requirements required for a given level of COR certification.

since 2012 and was never finalized. FAA stated that, as a result, only some COs follow this process.

According to the draft process, before appointing a COR to a contract, the CO determines the certification level the COR will need and documents it in the contract file. Based on AMS requirements, the CO then communicates the required certification level to the Program Office for consideration in nominating a qualified COR. Once the COR is nominated, the CO then issues a Delegation Letter to the COR to ensure the COR is aware of their responsibilities as the COR on the contract. However, because FAA has not formally implemented this process, COs have not consistently followed it.

In particular, COs are not consistently meeting requirements to use and maintain COR Nomination Forms and Delegation Letters. The COR Nomination Form determines the certification level the COR is required to hold in order to support a contract, taking into consideration various factors such as the complexity of the procurement, contract type, impact of any delays, and number and location of the performance sites. The COR Letter of Delegation ensures CORs are aware of their responsibilities.[44]

AMS requires its COs to use a checklist to ensure all required documents are maintained in the contract files, including the COR Nomination Forms and COR Letters of Delegation. Since October 1, 2013, AMS has required COs to create, store, and maintain these documents in FAA's Electronic Document Storage (eDocS) system. Despite these requirements, in our contract sample, we found:

- 71 CORs were assigned to the 74 contracts in our sample at the time of award, but only 20 Delegation Letters and 3 COR Nomination Forms were in the contract files.

- FAA was only able to provide an additional 16 Delegation Letters and 2 Nomination Forms when we requested the COR documentation that was not maintained in eDocS.

In total, for the 71 CORs assigned to the contracts in our sample, we were unable to obtain 45 COR Delegation Letters and 76 COR Nomination Forms.[45] FAA stated that it could not provide the remaining documents because they were never

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[44] According to FAA's Acquisition Workforce Profile, COR responsibilities could include resolving technical issues; providing technical direction to the contractor; interpreting technical processes and procedures for the CO; interpreting technical requirements; assisting with the acquisition strategy; assisting in the development of the statement of work; generating Government cost estimates; assisting in the negotiation of costs or price of technical requirements; monitoring contractor performance; reviewing and accepting services, supplies, and equipment; reconciling invoices; and recommending payments.

[45] Of the 71 CORs assigned to the contracts in our sample, some served on more than one of these contracts. AMS requires a nomination form and delegation form for each contract to which a COR is assigned.

used, cannot be located by FAA officials, or were not in an electronic format that FAA officials can currently access.

Because the Agency lacks a process to ensure that COs use and properly maintain COR nomination and delegation documents, we cannot verify nor can FAA be sure that the individuals serving as CORs on these contracts have the proper authority or the necessary experience and training to do so. As a result, FAA cannot be sure its CORs are appropriately monitoring its contracts and have the expertise to make technical recommendations, inspect deliverables, and require contractors to correct deficiencies. This in turn creates the risk that CORs may not be able to discover performance issues that can impact the cost or quality of the goods and services FAA receives. Further, unqualified CORs may take actions that could result in unauthorized changes or commitments, increasing the potential for disputes, claims, and potential Anti-Deficiency Act violations. Overall, the projected value of the contracts supported by CORs lacking Delegation Letters is $158 million.[46] These funds are at risk of being managed by unqualified CORs without clear lines of authority from their respective COs to perform their duties.

FAA P/PMs Also Are Not Always Appropriately Certified, Including Those Managing OMB Major Programs

According to FAA, to be certified as an Acquisition P/PM, an individual must complete the required training[47] to achieve the FAC-P/PM and FAA Specialization certifications. After FAA elected to align with Federal acquisition certification requirements in 2014, it required all P/PMs supporting OMB Major Programs to be certified at the Senior level, per DOT and OMB policy, within 1 year of being assigned to a program (see table 6).[48]

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[46] Our estimate of $158,185,771 has a precision of +/- $79,466,862 at the 90-percent confidence level so that our confidence limits range from $78,718,909 to $237,652,633.

[47] In order to obtain a FAC-P/PM Senior Level certification, the P/PM must complete multiple training courses, including Advanced Cost and Financial Management, Leadership and Strategic Management, Program Management using Earned Value Management, and Senior Leadership Capstone courses.

[48] FAI does not provide a firm list of courses required for FAC-P/PM certification. Rather, it provides a suggested list of courses that agencies can consider when developing their P/PM certification programs.

Table 6. P/PM Certification Requirements, October 2015–December 2018[a]

P/PM Certification Level	FAA Requirements to Achieve FAC-P/PM and FAA Specialization [b]	When Certification Is Required	Certification Maintenance Required Every 2 Years
Entry Level (Level I)	Minimum of 2 years of acquisition experience At least 1 year of project management experience within the past 5 years Competency Experience Checklist 5 training courses[c]	No timeframe listed [d]	80 CLPs
Mid-Level (Level II)	Minimum of 5 years of acquisition experience At least 2 years of project management experience and at least 1 year leading/managing programs/projects within the past 5 years Competency Experience Checklist Achieve Program Management Professional (PMP) certification 12 training courses[e]	24 months from date of assignment	80 CLPs
Senior Level (Level III)	Minimum of 8 years of acquisition experience At least 4 years of project management experience and at least 2 years leading/managing programs/projects within the past 5 years 2 developmental leadership activities Competency Experience Checklist Achieve PMP 11 training courses	12 months from date of assignment	80 CLPs

[a] The audit team reviewed certification requirements based on the year a P/PM was initially certified, ranging from 2010 to 2018. [b] FAI and FAA have updated these requirements effective fiscal year 2020. [c] As of January 2019, seven training courses were required for FAA's P/PM Entry Level certification. [d] FAA's P/PM Career Guides did not list a timeframe requirement for Entry Level P/PMs. [e] As of January 2019, 10 training courses were required for FAA's P/PM Mid-Level certification.

Source: FAA P/PM Career Guides

We drew a sample of 23 of a total of 34 FAA P/PMs who are assigned to OMB Major Programs and found that all 23 were missing some or all the required education, experience, training, and/or CLP achievement documentation in FAITAS. Moreover, none of these P/PMs met the FAC-C P/PM IT Certification requirements, which all OMB Major P/PMs are required to obtain, according to the FAA's Acquisition Workforce Career Planning, Development, and Resource Guide.

Of the 23 P/PMs whose FAITAS profile did not contain all the required documentation for certification, FAA was able to find some but not all of the

required documentation. Specifically, we identified missing documentation for several P/PMs certified after FAA adopted FAITAS:

- One P/PM was granted a FAC-P/PM Senior Level certification over a year before completing one of the 11 required courses. FAA stated it issued the P/PM a waiver for the course but provided an unsigned and unapproved waiver document. While the waiver states that it grants additional time to complete the required training, in this instance the P/PM was certified to perform duties on a senior level acquisition prior to completing the required coursework.

- Another P/PM did not meet all the required certification requirements until 7 months after receiving a FAC-P/PM Senior Level certification. FAA stated it issued the P/PM a waiver for this requirement but was not able to provide documentation of the waiver due to document accessibility issues.[49]

- A P/PM who holds a FAC-P/PM Entry Level certification did not complete and submit the required Competency Experience Checklist. When we brought this to FAA's attention, ACM officials stated the checklist is not required for the FAC P/PM Entry Level certification. However, FAA's P/PM Career Guide requires that the P/PM submit a signed copy of the checklist that describes the P/PM's technical and leadership experience in the required competency areas.

- An additional P/PM, who was awarded a FAC Senior Level certification after FAA began using FAITAS, did not complete two of the required training courses. FAA stated the training was completed prior to the P/PM being awarded the certification. However, FAA was unable to provide any supporting documentation due to document accessibility issues.

FAA's P/PM Career Guides clearly outline the FAC-P/PM and FAA Specialization certification training requirements for Agency P/PMs. However, when we presented our findings to FAA, Agency officials stated these P/PMs met all requirements prior to receiving their certifications. Our audit findings clearly do not support this assertion. Specifically, FAA's 2016 and 2018 P/PM Career Guides require P/PMs to complete specific training courses to obtain the FAC-P/PM and FAA Specialization certifications (see table 6). As a result, FAA awarded both the FAC P/PM and FAA Specialization certificates before these four P/PMs completed all of the Career Guides' certification requirements.

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[49] FAA stated it could not provide some of these documents due to office closures resulting from the COVID-19 pandemic.

In addition, according to FAA's P/PM Career Guide, once a P/PM is assigned to an OMB Major Program, the P/PM has 1 year to obtain the required FAC-P/PM Senior Level and FAA Specialization certifications, which FAA refers to as a "grace period." However, we found that 3 of the 23 P/PMs in our sample—who were assigned to OMB Major Programs—did not obtain their required Senior Level certifications even when we factored in the 1-year grace period. Yet these P/PMs were responsible for overseeing major FAA programs—one of which has encountered significant problems in the past. For example, in December 2016, FAA assigned an inadequately certified P/PM to FAA's Wide Area Augmentation System (WAAS),[50] even though the program was already experiencing a number of contract and project management challenges,[51] as noted in an earlier OIG report.[52] Due to these challenges, FAA ended up extending the WAAS program schedule and project, spending $1.2 billion more than originally intended. Two other major FAA programs involving inadequately certified P/PMs include the FAA Telecommunication Infrastructure (FTI) and Terminal Primary Surveillance (TPS) programs.[53]

Regarding the three inadequately certified P/PMs from our sample who were assigned to OMB Major Programs, an FAA official stated:

- Two P/PMs were removed from the OMB Major Program before the 1-year grace period expired, so they were not required to obtain the Senior Level certifications. Our audit findings do not support FAA's assertion in these two instances. We found both P/PMs supported an OMB Major Program past the 1-year grace period and did not obtain the required certification. In fact, one of these P/PMs supported an OMB Major Program for 20 months prior to obtaining certification.

- The remaining P/PM held a FAC-P/PM Entry Level certification while assigned to an OMB Major Program even though a FAC-PPM Senior Level is required. When we brought this to FAA ACM officials' attention, they were unaware the P/PM was assigned to an OMB Major Program, even though the P/PM had worked on the program for 17 months.

According to the ACM, P/PMs assigned to OMB Major Programs, and their current certification levels, are tracked via monthly spreadsheets. These spreadsheets are updated when the ACM receives information on P/PM

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[50] WAAS is a satellite-based navigation system that provides services to all classes of aircraft in all phases of flight, including en-route navigation, air departures, and airport arrivals.
[51] Specifically, WAAS had software development issues and inadequate cost estimates, and either had no modular contracting or OMB guidance was not followed.
[52] *FAA Reforms Have Not Achieved Expected Cost, Efficiency, and Modernization Outcomes* (OIG Report No. AV2016015), January 15, 2016.
[53] FTI is the primary means for FAA's telecommunications services and forms the basic infrastructure for NextGen; TPS is a consolidated investment representing FAA's primary surveillance radars.

assignments either through email, via phone or in-person conversations, or through SPIRE.

However, we identified inconsistencies in the ACM's monthly spreadsheets, raising questions about the accuracy of FAA's P/PM assignment data. Specifically, the monthly spreadsheets were not consistent with the P/PM information maintained by FAA's CPIC—which is used to report to the Department's Office of the Chief Information Officer and OMB on the P/PMs assigned to OMB Major Programs. Notably, the ACM's spreadsheets had different P/PM assignment and removal dates and did not include all assigned P/PMs. When we brought these discrepancies to FAA's attention, the ACM stated that the dates were not accurate because CPIC only updates its information annually. The ACM supported this assertion with some additional documentation for the dates for which one of the P/PMs was assigned to an OMB Major Program. However, these additional dates were different from those the ACM originally provided. As such, it is unclear whether the information FAA is maintaining accurately reflects when P/PMs are assigned to an OMB Major Program or obtain a FAC P/PM Senior Level certification.

Overall, we found that FAA lacks an effective process for determining whether its acquisition P/PMs have the required training and certificates to be assigned to OMB Major Programs or to ensure key organizations within FAA communicate changes to P/PM assignments. As a result, FAA cannot be sure its PPMs possess the necessary experience to effectively manage its complex portfolio of high-dollar and high-risk programs and contracts. This situation also increases the risk that FAA may report inaccurate information to OMB regarding the certification and qualifications of the P/PMs assigned to OMB Major Programs.

Finally, FAA has not enforced the requirement for P/PMs to obtain FAC-P/PM IT certification. Although OMB and FAA require all P/PMs assigned to an OMB Major Program to obtain this certification, the 23 P/PMs in our sample did not. These P/PMs are responsible for managing FAA's major IT investments, including important billion-dollar aviation modernization programs such as those supporting NextGen. Moreover, FAA's 2019–2022 Strategic Plan stresses the importance of FAA's P/PMs possessing the necessary skills and knowledge to take advantage of new IT solutions in enhancing program performance and promoting efficient operations. To ensure these P/PMs have the necessary specialized knowledge, skills, and abilities, the FAC-P/PM IT certification requires additional training, experience, and continuous learning requirements for P/PMs who manage specific IT-related investments (see table 7).

Table 7. FAC P/PM IT Certification Requirements Effective January 2016

P/PM Certification Level Required	FAA Requirements to Achieve FAC-P/PM IT Certification	When Certification Is Required
Mid-Level (Level II) Senior Level (Level III)	Must already have FAC-P/PM and FAA Specialization Level II or III Minimum of 2 years of program/project management experience supporting IT projects and programs acquisition experience working on specific IT related tasks Must meet core-plus competency requirements training, education, certification programs, or demonstration and documentation through fulfillment of knowledge, skills, and abilities Competency Experience Checklist Optional: 3 FAC-P/PM IT Training courses (if competencies not met through experience, education, etc.)[a]	Within 12 months from date of: • Assignment to OMB Major Acquisitions or the acquisition of Information Technology investments, or • Receipt of FAC-P/PM and FAA Specialization certifications

[a] Optional courses were added to the 2018 P/PM Career Guide.

Source: FAA P/PM Career Guides

However, FAA's ACM stated the Agency has not enforced this requirement and has instead focused on identifying its acquisition P/PMs and ensuring all of its OMB Major Program P/PMs obtain FAC-P/PM Level III and FAA Specialization Level III certifications. On May 27, 2020, during our review, FAA officials informed us that they plan to begin enforcing the IT certification requirement—although we were unable to verify this because IT certifications occurring after 2018 were outside the scope of our review. Nevertheless, until FAA fully enforces the FAC-P/PM IT Certification requirement, the Agency is taking a risk that its OMB Major P/PMs will not have the needed IT-related skills and training to effectively oversee FAA's portfolio of complex and diverse OMB Major Programs.

Conclusion

FAA relies on its acquisition workforce to ensure it receives the necessary goods and services to provide for a safe and efficient airspace system. This includes the Agency's multibillion-dollar investment in NextGen modernization efforts. By

electing to follow FAI's acquisition certification program, FAA took a significant step towards ensuring its acquisition workforce is properly trained and certified. However, FAA continues to face challenges in implementing this program and in ensuring only appropriately qualified acquisition personnel are being assigned to oversee the Agency's sizeable investments, including NextGen. Ultimately, sustained leadership and management attention are essential to ensure FAA's acquisitions are administered and managed by appropriately trained, certified, and warranted professionals. These steps are critical to better safeguard the Agency's investments and help achieve a safer, more efficient, and modern airspace system.

Recommendations

To enhance FAA's oversight and compliance with Federal and Agency requirements for acquisition workforce training, certification, and warrants, we recommend the Federal Aviation Administrator:

1. Establish and implement an effective process for: (i) identifying and tracking the Agency's acquisition workforce (such as Contracting Officers (COs), Contracting Officer's Representatives (CORs) and Program/Project Managers (P/PMs)) and (ii) collecting and maintaining their certifications and related training records. Data collected via this process and maintained in repositories should be complete, accurate, and readily accessible.

2. Identify, remove, and/or rectify those COs, CORs, and P/PMs—currently assigned to a contract or program—that lack the required training or certification to fulfill their designated role.

3. Develop and implement training and guidance related to the Agency's replacement of FAITAS. This training and guidance should address acquisition certification requirements, documentation, and application processes under the new system.

4. Implement performance and certification metrics for CORs and P/PMs.

5. Revise AMS to reflect FAA's decision to delegate approval authority for COR certifications to the Acquisition Career Manager.

6. Strengthen the process for nominating CORs to include completing, issuing, and storing COR Delegation Letters and Nomination Forms in the contract file.

7. Strengthen quality assurance procedures to verify accuracy when identifying and reporting the acquisition P/PMs assigned to OMB Major Programs.

8. Establish a timeline to implement and verify compliance with the requirement that all P/PMs assigned to OMB Major Programs obtain and maintain a FAC P/PM Information Technology Certification.

Agency Comments and OIG Response

We provided FAA with our draft report on August 4, 2021, and received its response on September 1, 2021, which is included in the appendix to this report. FAA concurred with all eight recommendations as written and provided appropriate planned actions and completion dates.

Actions Required

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

Exhibit A. Scope and Methodology

We conducted this performance audit between October 2019 and August 2021 in accordance with generally accepted Government auditing standards as prescribed by the Comptroller General of the United States. 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 objective.

To assess FAA's compliance with FAI's and departmental policies for obtaining and maintaining FAC-C certifications and issuing warrants, we asked FAA to provide us with a list of contracts and universes of three key acquisition workforce professionals: FAA's COs, CORs, and P/PMs for fiscal years 2016, 2017, and 2018. It took an extended period of time to validate the universes because the Agency relied on six standalone information systems to develop the requested data sets. While the validation of the data caused some delay in the audit, ultimately we were able to verify FAA's universe of contracts and COs. We were also able to validate FAA's data on its CORs and P/PMs—recognizing that it did not represent a complete universe. With the assistance of OIG's IT Specialist, we compared the data to the six standalone systems and worked with FAA to address discrepancies in the data found for each universe to determine validity. As such, we were able to conclude that the data for these universes were sufficiently reliable for our audit purposes.

For the universe of contracts, FAA provided 1,891 unique contracts from the PRISM database with an initial award date in fiscal years 2016, 2017, or 2018. For the sample, we stratified the universe into four strata based on contract warrant levels. A census was taken of the six FAA contracts with an unlimited warrant level, and a sample taken from the remaining 1,885 FAA contracts. For our sample size computations, we used an estimated non-compliance rate of 50 percent, a confidence level of 90 percent, and a precision no greater than +/-10 percent, with a minimum of two FAA contracts per strata. We allocated sample sizes to each strata as approximately proportional to the total number of FAA contracts in each strata. Samples were selected based on probability proportional to the size of the original contract amount. The total sample size was 74 contracts with a total dollar amount of $989,698,014.36 or 57.8 percent of the $1,711,272,46.81 in the universe.

For the universe of FAA COs, FAA provided 336 unique COs from the FPPS database for sampling. For our sample size computations, we used an estimated non-compliance rate of 50 percent, a confidence level of 90 percent, and a precision no greater than +/-10 percent. There was no stratification and a random sample of 57 FAA COs was taken.

For the universe of CORs, FAA provided a list of 2,464 CORs from the PRISM database. For the sample, we stratified the universe into four strata based on COR certification levels. For our sample size computations, we used an estimated non-compliance rate of 50 percent, a confidence level of 90 percent, and a precision no greater than +/-10 percent, with a minimum of two FAA CORs per strata. We allocated sample sizes to each strata as approximately proportional to the total number of FAA CORs in each strata. The total sample size was 69 FAA CORs. Of these 69 CORs, FAA identified 32 as uncertified. We requested FAA provide all contract actions that any of these 32 CORs worked on from fiscal years 2016 to 2018. As a result, we identified $184,426,627.10 of contract modifications managed by uncertified CORs.

For the universe of P/PMs, FAA provided a list of all 36 FAA P/PMs assigned to OMB Major Programs from the CIMS database. For our sample size computations, we used an estimated non-compliance rate of 50 percent, a confidence level of 90 percent, and a precision no greater than +/-10 percent. There was no stratification, and a random sample of 23 FAA P/PMs was taken.

We reviewed the Agency's (1) procurement policy and procedures, including AMS and FAA's Acquisition Workforce Plans from 2012 to 2020; (2) certification requirements listed in the individual CO, COR, and P/PM Career Guides from 2010 to 2020; and (3) certification and warrant guidance on FAA's internal portal, KSN. Additionally, we reviewed Governmentwide acquisition laws and policies, including the FAR, Public Law 104-50, Program Management Improvement and Accountability Act (PMIAA), OMB and OPM Memorandums, and FAI certification requirements. We also reviewed DOT acquisition policies including DOT's Acquisition Workforce Career Development Program Guide and DOT Memorandums related to acquisition professionals and PMIAA.

We interviewed officials at FAA Headquarters, including the FAA Acquisition Career Manager; Deputy Director of Acquisition and Contracting; PRISM Team Lead; Manager of Recruitment, Retention, and Workforce Development; Senior Advisor with the Program Management Office; and Branch Manager and Program Director with Capital Planning and Investment Control to understand FAA's processes. We also met with DOT officials, including the Senior Procurement Executive, Deputy Senior Procurement Executive, and Acquisition Career Manager.

In our contract sample, we reviewed the initial contract award information along with the certifications for the awarding CO, COR, and P/PM for each contract. The COs and CORs were identified by reviewing the contract found in FAA's eDocS database or were provided to us directly by FAA. Additionally, we assessed whether the COs, CORs, and P/PMs complied with FAI and FAA's AMS training, certification, and warrant requirements and held the required certifications and warrants to support contract actions.

In our acquisition workforce samples, we reviewed the certifications for 57 COs, 69 CORs, and 23 P/PMs in the FAITAS database, as well as the warrants for COs in FAA's KSN portal. We also reviewed certification, training, and experience documentation that was not stored in FAITAS, which FAA provided upon our request. In addition, we assessed whether the COs, CORs, and P/PMs complied with FAA's Career Guides and FAA's AMS, to include applicable Federal requirements for training, certification, and warrants.

Using AMS contracting requirements and FAI's and FAA's certification training, experience, and competency requirements for COs, CORs, and P/PMs, we developed and used standardized checklists to evaluate each of our four samples. This included all 74 contracts, along with the 46 COs and 71 CORs who were associated with the contracts in our contract sample, and 57 COs, 69 CORs, and 23 P/PMs in our acquisition workforce samples. Our checklists assessed whether the sampled acquisition workforce professionals maintained certification and warrant requirements, at their associated levels, in order to conduct the work being performed. Of note, FAA took extended periods of time to provide audit documentation, and the subsequent information was frequently incomplete and required additional follow-up requests. FAA officials attributed part of this delay to office closures resulting from the Coronavirus Disease 2019 (COVID-19) pandemic. Ultimately, if support existed, FAA provided most of it within 7 months after our initial requests.

Finally, we reviewed GAO, OIG, and other agency reports on Federal acquisition personnel certification challenges, acquisition professionals at FAA and DOT, FAA's major programs, COs exceeding warrant authority, and related activities. We also reviewed applicable sections of the FAR and the DOT Acquisition Workforce Career Development Program Guide for best practices.

Exhibit B. Organizations Visited or Contacted

FAA Offices

Acquisition and Business Services

Acquisition and Contracting

Acquisition Policy and Oversight

   Acquisition Career Management Division

   Acquisition Oversight and Reporting Division

Acquisition Reporting and Metrics

Capital Planning and Investment Control

Program Management Office

Other Organizations

DOT Office of Senior Procurement Executive

Federal Acquisition Institute

Exhibit C. List of Acronyms

AAQ	Acquisition and Contracting
ABP	Office of Budget and Programs
ACM	Acquisition Career Manager
ACQ	Acquisition and Business Services
AMS	Acquisition Management System
CIMS	Corporate Investment Management System
CLPs	Continuous Learning Points
CO	Contracting Officer
COR	Contracting Officer Representative
CPIC	Capital Planning and Investment Control
CSOD	Cornerstone OnDemand
DAD	DOT Acquisition Directive
DAU	Defense Acquisition University
DOT	Department of Transportation
eDocS	Electronic Document Storage
FAA	Federal Aviation Administration
FAC	Federal Acquisition Certification
FAE	FAA Acquisition Executive
FAI	Federal Acquisition Institute
FAITAS	Federal Acquisition Information Training System
FAR	Federal Acquisition Regulation
FPDS	Federal Procurement Data System
FTI	FAA Telecommunication Infrastructure
HRSD	Human Resource Services Division
IT	Information Technology
KSN	Knowledge System Network
NAS	National Airspace System
NextGen	Next Generation Air Transportation System
OFPP	Office of Federal Procurement Policy

Exhibit C. List of Acronyms   35

OIG	Office of Inspector General
OMB	Office of Management and Budget
P/PM	Program/Project Manager
PII	Personally Identifiable Information
PMIAA	Program Management Improvement and Accountability Act of 2016
PMO	Program Management Organization
PRISM	Purchase Request Information System
SOP	Standard Operating Procedure
SPE	Senior Procurement Executive
SPIRE	Simplified Program Information Reporting and Evaluation
TPS	Terminal Primary Surveillance
WAAS	Wide Area Augmentation System

Exhibit C. List of Acronyms   36

Exhibit D. Major Contributors to This Report

DARREN **MURPHY**	PROGRAM DIRECTOR
KENNETH **PRATHER**	SENIOR ACQUISITION ADVISOR
KATHRYN **NOVICKY**	PROJECT MANAGER
PATTI **LEHMAN**	SENIOR AUDITOR
JONATHON **NUCKLES**	SENIOR ANALYST
GRACE **ENTWISTLE**	ANALYST
AUDRE **AZUOLAS**	SENIOR TECHNICAL WRITER
AMY **BERKS**	DEPUTY CHIEF COUNSEL
GEORGE **ZIPF**	SUPERVISORY MATHEMATICAL STATISTICIAN

Appendix. Agency Comments

Federal Aviation Administration

Memorandum

Date: September 1, 2021

To: Mary Kay Langan-Feirson, Assistant Inspector General for Acquisition and Procurement Audits

From: H. Clayton Foushee, Director, Office of Audit and Evaluation, AAE-1

Subject: Federal Aviation Administration's (FAA) Response to Office of Inspector General (OIG) Draft Report: FAA Faces Challenges in Tracking Its Acquisition Workforce and Ensuring Compliance With Training, Certification, and Warrant Requirements

The Federal Aviation Administration (FAA) is committed to developing and training a workforce capable of effectively planning, managing, and overseeing complex acquisition programs and associated contracts. Sustaining our current workforce with the necessary skills and creativity is vital to the safety and efficiency of the National Airspace System and for identifying, evaluating, and acquiring new technologies for the future. The Agency has received accolades for its acquisition development and certification programs, including two Horizon Interactive Awards for instructional design and training from the international interactive production industry and the Five Star Award for Excellence in Distance Learning from the Federal Government Distance Learning Association. The FAA will benchmark other Federal and private organizations that may possess more innovative practices as we seek to enhance our current expertise.

The FAA concurs that there are opportunities to improve the policies, processes, and technology utilized to develop and certify the acquisition workforce and offers the following observations:

- There is no single acquisition workforce training and certification tracking system identified within government or commercial markets that meets every training need of Federal agencies, including the FAA. Regardless of which commonly employed tracking system is utilized, such as the Federal Acquisition Institute Training Application System (FAITAS) or the Federal Acquisition Institute (FAI) Cornerstone OnDemand (CSOD); the limitations of those systems force agencies to employ additional electronic and manual systems to comply with tracking and oversight requirements.

- Training and certification paper records are maintained physically within the FAA Headquarters Building. When FAA migrated to FAITAS in fiscal year 2016, FAI determined that historical supporting documentation for pre-FAITAS certifications couldnot be uploaded. FAI also recently decided not to upload historical documentation into CSOD, forcing FAA to leverage multiple solutions once again to manage certification information.

Upon review of OIG's draft report, we concur with all the recommendations as written. FAA will implement recommendations 2, 3, 5, 6, 7, and 8 by March 30, 2022, and recommendations 1 and 4 by September 30, 2022.

We appreciate this opportunity to offer additional perspective on the OIG draft report. Please contact H. Clayton Foushee at Clay.Foushee@faa.gov if you have any questions or require additional information about these comments.

U.S. DOT OIG
Fraud & Safety
Hotline

hotline@oig.dot.gov | (800) 424-9071

https://www.oig.dot.gov/hotline

Our Mission

OIG conducts audits and investigations on behalf of the American public to improve the performance and integrity of DOT's programs to ensure a safe, efficient, and effective national transportation system.