

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF THE INSPECTOR GENERAL**

**AUDIT OF THE
OFFICE OF
CONTRACTING AND PROCUREMENT
TRAINING PROGRAM**



**CHARLES C. MADDOX, ESQ.
INSPECTOR GENERAL**

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Office of the Inspector General

Inspector General



June 28, 2002

Jacques Abadie III
Chief Procurement Officer
Office of Contracting and Procurement
441 4th Street, N.W., Suite 800
Washington, D.C. 20001

Dear Mr. Abadie:

Enclosed is our final report summarizing the results of the Office of the Inspector General (OIG) audit of the District of Columbia Office of Contracting and Procurement (OCP) Training Program (OIG No. 01-1-04MA).

As a result of our audit, we directed six recommendations to OCP that represent necessary actions to correct the reported deficiencies.

In response to the draft report, OCP indicated that it is taking aggressive actions to address the training issues identified in the draft report. OCP generally concurred or met the intent of the recommendations. However, we request that OCP reconsider its position on Recommendations 1, 3, 4, and 5, and reply to this final report by July 28, 2002. The OCP comments to our draft report are incorporated where appropriate. The full text of OCP's response is included as Exhibit E.

We appreciate the cooperation and courtesies extended to our staff during the audit. If you have questions, please call me, or William J. DiVello, Assistant Inspector General for Audits, at the number below.

Sincerely,

A handwritten signature in black ink that reads "Charles C. Maddox, Esq." The signature is written in a cursive style with a large, prominent initial "C".

Charles C. Maddox, Esq.
Inspector General

CM/dw

Enclosure

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Mr. Jacques Abadie, III, Chief Procurement Officer (2 copies)

**AUDIT OF THE
OFFICE OF CONTRACTING AND PROCUREMENT
TRAINING PROGRAM**

TABLE OF CONTENTS

EXECUTIVE DIGEST 1

INTRODUCTION

BACKGROUND 3

OBJECTIVES, SCOPE, AND METHODOLOGY 5

FINDING AND RECOMMENDATIONS

**FINDING: IMPLEMENTING AN EFFECTIVE PROCUREMENT
 TRAINING PROGRAM** 6

EXHIBITS

**EXHIBIT A: LIST OF ELECTIVE, PROCUREMENT-RELATED
 WORKSHOP COURSES** 15

**EXHIBIT B: LIST OF MANDATORY/ELECTIVE PROCUREMENT
 TRAINING CORE COURSES** 16

**EXHIBIT C: SCHEDULE OF EMPLOYEE IN-HOUSE
 WORKSHOP COURSES** 18

**EXHIBIT D: SCHEDULE OF EMPLOYEE PAST PROCUREMENT
 TRAINING** 22

**EXHIBIT E: OCP RESPONSES TO THE DRAFT REPORT FINDINGS
 AND RECOMMENDATIONS** 26

EXECUTIVE DIGEST

OVERVIEW

This report summarizes the results of our audit of the procurement training activities carried out by the District of Columbia Office of Contracting and Procurement (OCP). The audit was conducted as required by the provisions of the Procurement Practices Act of 1985 (PPA) and is part of our strategy to cover procurement and contract administration on a continuous basis.

CONCLUSIONS

Although OCP has taken aggressive action to design a formal training program for its procurement employees, OCP has not been able to fully implement the program. OCP did not fully implement the training program due to:

- budget constraints;
- limited evaluation of training needs and verification of training received; and
- inadequate individual development plans.

As a result, OCP procurement employees are not assured of receiving the training needed to carry out their responsibilities of procuring hundreds of millions of dollars in goods and services for the District government. Moreover, the limited training hinders OCP efforts to correct any identified skills and knowledge gaps for effective performance and to stay abreast of the changes in the procurement profession.

SUMMARY OF RECOMMENDATIONS

We addressed six recommendations to the Director, OCP, that we believe are necessary to address the concerns described above. The recommendations center on: verifying employee educational background and prior procurement training; assessing employee skills; targeting individual development plans to the specific needs of individuals; evaluating personnel training needs; using alternative low-cost sources of procurement training; developing an adequate tracking system; and, completing the OCP handbook.

MANAGEMENT RESPONSE

Management agreed to some of our recommendations and has already taken or has plans to take corrective action in regards to those recommendations. However, OCP management stated that our recommendations in regards to verifying employee educational backgrounds and establishing a training database would be duplicative of efforts already taken or underway. Also, OCP did not consider it practical to seek alternative training sources because the alternative training may not be geared towards District regulations.

EXECUTIVE DIGEST

OIG COMMENTS

We request that OCP reconsider its response regarding verification of employee education and prior training, using alternative training sources, and, establishing a database to track employee training. Contrary to OCP's position, we were advised that the District's Office of Personnel does not necessarily verify employee education. The Office of Personnel also does not verify training courses employees may have taken. Although alternative low-cost procurement training from other sources may not focus specifically on District procurement regulations, training available from these other sources within the District metro area could provide valuable, basic procurement training applicable to any procurement process. The administrative services modernization program, which OCP stated that the Office of the Chief Technology Office was implementing and which will include an employee-training database, is not scheduled for completion until the end of calendar year 2004. In the interim, OCP needs to establish an efficient means to track employee training.

INTRODUCTION

BACKGROUND

District Procurement Regulations

The Procurement Practices Act of 1985, D.C. Law 6-85, (codified as amended at D.C. Code §§ 2-301.01 – 2-311.02 (2001)), established a uniform system of procurement management for the District government. The Act applies to all agencies and employees of the District government that are subordinate to the Mayor. Title 27 of the District of Columbia Municipal Regulations provides the rules and regulations for procurement activities of the District government. The requirements on training, as stated in the District code and regulations, were generally limited to establishing guidelines and programs for procurement employees without offering any specifics.

The Office of Contracting and Procurement

OCP was created in accordance with the Chief Procurement Officer Qualification Amendment Act of 1997, D.C. law 12-82 (codified as amended at D.C. Code § 2-30207 (2001)). This act centralized all procurement functions with the associated personnel and budget authority under the authority of the chief procurement officer. OCP provides services in three primary programs: contract operations; contract support; and contract administration. Contract Administration provides leadership, management, and administrative services and policy direction for OCP. Contract Administration is also responsible for management and training personnel.

Professional Community Management Unit

As part of Contract Administration, OCP established the Professional Community Management Unit (PCMU) to reverse the past lack of training opportunities for the District's procurement workforce, to enable the workforce to stay abreast of the changes in the procurement profession, and to correct skills and knowledge gaps in several key areas required for effective performance. Prior studies conducted by OCP and external consultants identified various skills and knowledge gaps. Consequently, these studies recommended strategies for improving procurement skills through training.

PCMU's mission, as stated in the OCP draft handbook for Career Development Training Policy, is to provide programs that afford each member of the OCP procurement community access to education and training to achieve professional competence in his or her job and to create an organizational culture of continuous learning to optimize performance and program execution. In doing so, OCP staff will be better equipped to educate its clients to the procurement process, provide assistance in handling procurement requests, and facilitate the process to insure the speed, quality and cost-effectiveness of goods and services delivered to District residents.

INTRODUCTION

Procurement Training Programs

In March 2000, OCP launched a formal training program to provide structured training and career development activities for OCP employees at every grade level. Through the OCP operations booklet for fiscal year 2001, known as the “Concept of Operations,” OCP viewed the structured training program and employee development as key elements in the agency’s desired goal of developing the OCP into a world -class procurement organization.

From March 2000 through July 2001, OCP delivered procurement-related and non-procurement-related courses. The procurement-related courses consist of 20 elective, in-house workshops (*see* Exhibit A). Generally, OCP senior management taught the procurement-related workshops. The workshops offered limited, basic information and classroom interaction based on various segments, phases, or subjects of the District procurement process. OCP employees and program personnel (staff and managers) from other District agencies took part in training workshops. We determined that OCP held 81 procurement-related workshop sessions during the 17-month period.

In addition, non -procurement-related courses (foundation skill classes) are provided by the D.C. Office of Personnel’s Center for Workforce Development (CWD). The CWD class sessions cover a number of foundation skills ranging from refresher mathematics to Microsoft Excel spreadsheet courses.

In May 2001, OCP awarded a training contract to customize the development and delivery of five competency -based, procurement training core courses for procurement employees in contracting positions. The five courses were: (1) Basic Source Selection; (2) Contract Pricing; (3) Contracting By Negotiation; (4) Negotiation Strategies and Techniques, and (5) Contract Law. The training vendor was tasked to include three learning levels of training for each course. Classroom time for basics would be 5 days. Classroom time for intermediate and advanced, however, would be three days. The first of the core courses, Basic Source Selection, was held in late September 2001.

According to the draft handbook, OCP plans to offer a total of 37 mandatory/elective procurement training core courses (*see* Exhibit B). The mandatory/elective core courses are to be taught by contract instructors. Furthermore, the core courses are in addition to the current workshop courses, foundation skills courses, and interpersonal skills development classes. In addition, OCP’s planning strategy in its operations booklet for fiscal year 2001 calls for a full range of training and educational services needed within OCP. These services (college credit, tutoring, mentoring, internship, and so on) are to be grouped by components under the “OCP Corporate University” structure.

INTRODUCTION

OBJECTIVES, SCOPE, AND METHODOLOGY

The objectives of the audit were to determine whether OCP operated the education training programs in accordance with applicable laws, regulations, policies, procedures, and rules; and did so in an efficient, effective, and economical manner. The audit generally covered the program activities from March 2000 through September 2001 and was conducted in accordance with generally accepted government auditing standards. During the course of the audit, we employed the following methodologies:

- reviewed District procurement regulation requirements on education/training and OCP policies and procedures, as well as management and financial controls;
- reviewed prior reports on the procurement activities and services related to training the acquisition workforce;
- interviewed officials inside and outside of OCP to gain a general understanding, overview, concerns, and benchmark comparisons of the procurement education/training programs;
- observed procurement-related classes;
- sampled 16 of 111 OCP current and former employees performing procurement tasks for interviews and detailed reviews of OCP training database and records, including class attendance;
- compared 11 of 20 elective, in-house courses with training sources outside of OCP for course length (classroom time duration); and
- compared and analyzed the course contents of four in-house courses with the course contents of similar courses provided by outside training sources.

FINDINGS AND RECOMMENDATIONS

FINDING: IMPLEMENTING AN EFFECTIVE PROCUREMENT TRAINING PROGRAM
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SYNOPSIS

Although OCP has taken aggressive action to design a formal procurement training program, OCP has not been able to fully implement an effective procurement training program. OCP has not fully implemented an effective training program because: (1) it has not had an adequate training budget; (2) it has not been able to validate the training profiles of its work force; and (3) individual development plans of its employees have not been based on specific training needs. As a result, OCP personnel are not assured of receiving adequate training to carry out their responsibilities in awarding hundreds of millions of dollars in contract and procurement actions each year to acquire goods and services.

DISCUSSION

An effective training program is essential to enable OCP personnel to meet their procurement responsibilities in obtaining goods and services annually for the District government. According to the fiscal year 2001 Comprehensive Annual Financial Report for the District, the District spent nearly \$700 million from the General Fund alone to procure goods and services for District agencies. The D.C. Code and the DCMR require OCP to have procurement-training opportunities in place. In addition, sound and widely-held business practices provide for organizations to have training programs for procurement personnel, as well as personnel in general.

D.C. Code § 2-302.03(b)(7) (2001) states that the Director, OCP, shall have the authority and the responsibility “to develop guidelines for the recruitment, training, career development, and performance evaluation of procurement personnel.” Title 27 DCMR § 4500.1 reads:

The Director shall establish and conduct classes, workshops, and other training programs based on District procurement law, rules, and procedures in accordance with § 1101 of the D.C. Procurement Practices Act of 1985 (the “Act”).

In addition, 27 DCMR § 4500.6 reads:

District training programs and training requirements shall be designed to ensure that persons who have authority to contractually bind the District have the necessary experience, training, and technical knowledge to make sound decisions.

FINDINGS AND RECOMMENDATIONS

OCP described its procurement training planning strategy in its operations booklet for fiscal year 2001. The strategy called for developing within OCP a “Corporate University Structure” to handle OCP’s procurement training needs through a full range of training and educational services. Components of the Corporate University Structure were to have included career counseling, college credit, establishment of educational partnerships, mentoring via internships, and on-the-job training. In addition, there were to be components established for orientation sessions, performance consulting, systems integration, training via tutoring, and workshops.

Budget Constraints

OCP had intended to engage an educational consultant to assist in the overall development of its training program under the Corporate University Structure. The consultant’s tasks were to include creating administrative support systems, and identifying and establishing partnership agreements with area colleges and procurement training providers. However, OCP could not hire a contractor to fully achieve its goals due to budgetary constraints. OCP’s training budget request of \$980,000 for fiscal year 2001 was not approved during the District’s budget process. In addition, the approved budget for fiscal year 2002 did not include funds earmarked for training.

Because of the budget constraints, OCP started conducting 20 workshops in-house in an effort to get the workshop component of the Corporate University Structure underway. However, the workshops were not comprehensive in terms of topics offered, course length, and depth of coverage. For example, the OCP workshop curriculum did not include Construction Contracting, Contracting For Information Technology, and Best Value Acquisition. Eleven of the OCP workshops were short, measured by number of hours (*see* Exhibit A), as compared with 11 similar non-District training courses measured by number of days.

Moreover, the limited workshops were elective courses and taught generally by senior OCP managers who have contracting duties and other office responsibilities to perform. Because the workshops were of limited depth and length, the courses would not, in and of themselves, enable the agency to fully reach its goal of providing sufficient, wide-ranging training opportunities to the District’s procurement-related workforce. A comprehensive training program would enable procurement personnel to stay abreast of the changes in the procurement profession and to correct any identified skills and knowledge gaps for effective performance.

In addition, the workshops alone, given their brevity, would not ensure full compliance with 27 DCMR § 4500.6, which requires persons with the authority to contractually bind the District to have the necessary experience, training, and technical knowledge to make sound decisions. We also found that some scheduled workshops were cancelled, some procurement staff did not attend entire workshops, and some employees did not show up at all for the workshop sessions.

FINDINGS AND RECOMMENDATIONS

In a further attempt to implement elements of its strategic procurement training plan, OCP took action to offer core courses included in a draft procurement training handbook issued in April 2000. OCP listed 37 mandatory and/or elective procurement-training core courses it planned to deliver. The courses were based on procurement proficiency skill levels and employee grades. (See Exhibit B.) Due to budget constraints, OCP re-prioritized its authorized budgets for fiscal years 2001 and 2002 to pay for the services of a training vendor to develop 5 of the 37 courses. OCP awarded a 3-year, \$2.16 million contract (base year plus 2 option years) in May 2001. The objective of the training contract was to customize the development and delivery of five competency-based, procurement training core courses for procurement employees in contracting positions. The five courses were: Source Selection, Contract Pricing, Contracting By Negotiation, Negotiation Strategies and Techniques, and Contract Law. These courses were more in-depth (comprehensive) than the workshops. The cost for the first year of the contract was about \$834,000.

As stated earlier, OCP personnel utilized the District's CWD to attend foundation skill classes such as refresher mathematics and Microsoft Excel. OCP should explore utilizing institutions such as the University of the District of Columbia for low-cost procurement training for its workforce and the availability of free or low-cost courses at other government organizations.

Evaluation of Training Needs and Verification of Training

OCP has not, for the most part, evaluated the training needs of its personnel and verified prior training and education. In the operations booklet for fiscal year 2001 and the draft procurement training handbook, OCP described two activities for evaluating and verifying employee skills and training. These activities were assessing the skills and needs of its employees and developing student profiles.

OCP officials wanted to perform a comprehensive skill assessment on each OCP employee. However, OCP could not hire an employee assessment contractor due to the lack of funding. OCP's attempt to have another District agency perform the assessments also was not successful. Thus, the training noted for 16 employees listed in Exhibit D has not been verified.

OCP also discussed a student profile form in its draft handbook. However, the form and its content have yet to be developed. OCP had limited staff – only two employees – assigned to its training unit, PCMU. The two positions were a training manager and a training assistant. The tasks of identifying professional opportunities, determining performance skills, etc., remained overwhelming for the limited training staff.

In assessing the effectiveness of its course offerings, OCP currently relies on the written evaluation comments completed by the students at the end of the class session. Another

FINDINGS AND RECOMMENDATIONS

evaluation tool expected to become a routine procedure is student testing at the end of the core course session.

However, in order to effectively track the assessment of employee skills and training received, OCP needs an adequate management information system for such purposes. For 12 of the 14 years since the enactment of the Procurement Practices Act of 1985, OCP had not established an effective record system to track employee training. Copies of certificates received by the employees for completion of in-house or outside courses were not maintained and recorded in an established database or record file. Attendance records on students who registered, appeared, and completed in-house training courses prior to March 2000 were not established and maintained. Moreover, OCP had not established procedures to verify the training new employees might have received elsewhere, as indicated in their resumes.

When OCP began delivering the in-house workshop courses in March 2000, the agency did not have an automated database system to track employee training. Using resources on hand, OCP made use of Microsoft Excel and Word software applications to maintain training databases. The two applications formed the current, stand-alone “stovepipe” procurement training information system. At this time, OCP also began to maintain attendance records for each in-house workshop class session that was held. However, not all class sessions had sign-in sheets with signatures. Only 59 of 81 sign-in sheets had signatures. OCP used Microsoft Word to establish the training matrix file to collect education and training data, based in part on the responses received by employees. Current and prior training courses, not all procurement-related, were included. OCP used Excel to establish the transcript file for capturing training data on each employee attending or completing the procurement workshops and foundation skill classes held under the agency’s new program. OCP considered the transcript file the most important component of the participant’s official personnel training record. OCP maintained other files using Excel, such as course records.

The current system is not adequate to meet OCP’s needs. Any reports or specific training information had to be retrieved or analyzed manually due to software limitations. Further, information collected was not always accurate or efficient. We found evidence of duplicate and incomplete training data regarding the employee training history. Examples include:

- not all 162 current and former employees (excluding 7 new employees hired after June 1, 2001) were listed in both training history files; and
- partial or no education/training data was found for 51 of 155 employees listed in the matrix file.

In addition, from our review of records of 16 sampled employees, we ascertained that:

- not all procurement courses completed by June 1, 2001, were included in both the Matrix and Transcript training history files;
- neither of the training history files contained class hours or course count indicated in the amount of training received; and

FINDINGS AND RECOMMENDATIONS

- the transcript file was not always accurate as to the training courses attended and completed.

Need for Targeted Individual Development Plans

OCP had not established programs for career development for its employees and had not established minimum training requirements. Such programs, if properly designed, should assist individual employees and OCP in developing individual professional growth plans. Under the guidance of a supervisor, goals of career development for the individual should be established. Methods designed to achieve these career goals should be developed. Consideration must also be given to the level of procurement experience, prior training achieved, and formal education, such as degrees and professional certifications. The programs together should include a list of expected training courses essential to competently perform current and future contracting duties based on education, training level, on-the-job training, and experience as related to current job position responsibilities.

Even though the draft procurement training handbook issued in April 2000 contained career development as one of the objectives, OCP had yet to complete the individual development plan, student profile, or skill assessment program during the audit period. An OCP official stated that the agency should have completed the individual development plan (IDP) on all OCP staff during the beginning of FY 2002. During the audit period, only OCP supervisors in Management Supervisory Service positions had completed IDPs.

Employee IDPs should have been targeted toward assuring that employees received a minimum number of course hours with the training based on assessed needs and career development paths. OCP had not established internal standards regarding the training time or number of courses for procurement personnel by the start of this audit. Three contract specialists had not even completed 3 courses during the 17-month audit period (*see* Exhibit C, Employees #2, #3, and #9). OCP corrected the lack of a minimum training requirement by requiring mandatory minimum training requirements of 3 procurement courses annually for contracting personnel in the 1102 series. The requirements should be reflected in the contracting staff's IDP, according to the memorandum.

FINDINGS AND RECOMMENDATIONS

RECOMMENDATION 1

We recommended that the Director of the Office of Contracting and Procurement verify educational background and prior formal procurement training taken by employees.

OCP RESPONSE

OCP stated that verification of previous employment and educational background of its employees is completed during the employment screening process conducted by the District of Columbia Office of Personnel (OP). Requiring OCP to perform the same verification process would be inefficient and duplicative. In addition, beginning in October 2000, OCP required its employees in the 1102-series to provide copies of acquisition training certificates from educational institutions or from other organizations that sponsored procurement-related. Also, OCP staff members claiming certification with a procurement professional association are required to provide copies of their certification and/or letter confirming the currency of the certification.

OIG COMMENT

The OP informed the OIG that OP does not necessarily verify educational background. OP verifies educational background of applicants when there is a “positive educational requirement.” A positive educational requirement exists when a degree is necessary for a position such as a vacancy for a physician, engineer, or attorney. A positive educational requirement does not exist for contract specialists or contract price analysts, for example, because individuals may qualify for these positions based on experience or education. In other words, OP does not routinely verify the educational background of every applicant who is hired. Officials in OP also informed us that OP does not verify the formal training that applicants may list on their resumes or applications. Based on the information provided by OP, we maintain that OCP should institute a verification process to ascertain the educational background and training of its employees to ensure the accuracy and validity of employee training data. We request that the Director, OCP, reconsider his position on this recommendation in response to this final report.

RECOMMENDATION 2

We recommended that the Director of the Office of Contracting and Procurement put in place the comprehensive skill assessment of OCP employees.

OCP RESPONSE

OCP concurred with this recommendation. OCP stated in its response that it has identified an organization that offers employee assessments with Fortune 500 companies, colleges, and state and local governments. OCP plans to contract employee assessment services in fiscal year 2003 when funding resources become available.

FINDINGS AND RECOMMENDATIONS

OIG COMMENT

The actions planned by OCP should correct the condition noted.

RECOMMENDATION 3

We recommended that the Director of the Office of Contracting and Procurement design an individual development plan for each employee, taking into consideration individual training needs, minimum training requirements, and career development.

OCP RESPONSE

OCP stated in its response that this recommendation was successfully implemented starting October 1, 2001. Training conducted under individual development plans is carefully monitored to ensure employee skills are kept current and to address any deficits.

OIG COMMENT

OCP's response indicated that the OP mandated the requirement for an individual development plan (IDP) for certain designated employees and that OCP went further and mandated IDPs for all OCP employees. This is noteworthy, however, OCP does not state whether all employees, especially those in procurement contracting positions, have current IDPs based on their individual training needs. The Director, OCP, needs to make a clear affirmation as to whether OCP procurement employees have current IDPs when responding to this final report.

RECOMMENDATION 4

We recommended that the Director of the Office of Contracting and Procurement strengthen the existing training program through alternative solutions, including the use of free or low-cost outside training sources or other District agencies, such as the University of the District of Columbia.

OCP RESPONSE

OCP did not concur with this recommendation stating that it is not realistic based on the availability in the marketplace. OCP listed the reasons in which the use of free or low-cost outside training at identified organizations or institutions is not available or does not meet the specific needs of OCP and its staff members. Further, OCP added that its in-house training, along with foundation courses provided by the Center for Workforce Development, offered some solutions to substantive training needs in preparation for more in-depth training planned for the following year.

FINDINGS AND RECOMMENDATIONS

OIG COMMENT

We disagree with OCP's response. At the time of our fieldwork, OCP's curriculum did not have basic contract training, contract negotiations, cost/price analysis, and other important or fundamental procurement courses offered. We view such courses as highly necessary and mandatory. New or promoted OCP employees that lack such training cannot function proficiently and efficiently at their assigned tasks. OCP workshops do not provide substantive training to enable OCP employees to improve their skills and learning levels. We realize that any free or low cost training offered by colleges, federal agencies, and professional associations would not necessarily cover specific, District procurement regulations or procedures. However, the procurement training available from other sources would focus on general procurement theory that would be applicable to all procurements. The techniques, strategies, and other tools gained from attending such courses should greatly enhance the employees' ability to handle most procurement tasks. We request that the Director, OCP, reconsider his position on this recommendation in response to this final report.

RECOMMENDATION 5

We recommended that the Director of the Office of Contracting and Procurement move rapidly toward establishing an automated database system that meets agency requirements, preferably designing or adopting a procurement training module to be compatible or part of any planned comprehensive procurement management information system.

OCP RESPONSE

OCP stated in its response that this recommendation is duplicative because the District's Office of Technology Officer (OCTO) in November 2001 announced the implementation of a modernization program to include the automation of many human resources functions, including the collection and recordation of employee training and development.

OIG COMMENT

The actions planned by OCTO to automate human resource functions District-wide will not be completed in the short term (less than a year) or necessarily the near future based on recent OIG audits and inquiries of OCTO. The administrative services modernization program is not scheduled for completion until the end of calendar year 2004. In the meantime, OCP needs to record and accurately track employee training. Such data can be transferred to the District-wide employee training system when the system is implemented. The Director, OCP, needs to make a clear affirmation as to when OCP will establish a mechanism that meets agency requirements when responding to this final report.

FINDINGS AND RECOMMENDATIONS

RECOMMENDATION 6

We recommended that the Director of the Office of Contracting and Procurement finalize the draft handbook, including completing student profile forms and adding minimum training requirements.

OCP RESPONSE

OCP stated in its response that the draft handbook would be finalized by the end of August 2002. Distribution of the completed handbook will begin at the start of the next fiscal year.

OIG COMMENT

The planned actions by OCP should correct the condition noted.

**LIST OF ELECTIVE, PROCUREMENT-RELATED
 WORKSHOP COURSES**
 (In-House)

<u>Name of Workshop Course</u>	<u>Current Classroom Hours</u>	<u>Class Sessions Held</u>
1. Business Clearances	2.0	5
2. Contract Tracking System: OCP on-line Solution	3.0	1
3. Contracting Professional as a Business Manager	6.0	2
4. Contracting Officer's Technical Representative (Contract Administration)	12.0	11
5. DC Government Purchase Card Program	1.5	2
6. DC Government Travel Card Program	2.0	3
7. Doing Business with/Understanding Small & Business Enterprises	2.0	2
8. Dunn & Bradstreet: Tools for Market Research and Contractor Evaluation	2.0	2
9. Electronic Commerce/Procurement in DC Government	1.5	1
10. Ethics in DC Government Contracting	2.0	5
11. Government Contracting: The Basics	3.0	14
12. Human Care Agreement	2.0	1
13. Introduction to Cost/Price Analysis	3.0	6
14. Legislative Basis for Contracting in DC Government	3.0	3
15. Planning & Managing the Acquisition Process	3.0	7
16. Preparing for Contract Appeal Litigation/Contract Claims	2.0	3
17. Service Level Agreement Training	2.0	1
18. Source Selection	2.0	2
19. Statement of Work - Development, Analysis, and Performance	3.0	8
20. Using Technology to Improve Procurement Efficiency in DC Government	2.0	2
		<hr/> 81 <hr/>

Source: Office of Contracting and Procurement, as of July 31, 2001.

**LIST OF MANDATORY/ELECTIVE
PROCUREMENT TRAINING CORE COURSES**

	Name of Core Course	Proficiency Level/DS Pay Grades			
		I 7-9	II 11-13	III 14-15	IV 16 & up
1.	Advanced Contracting		M	M	
2.	Advanced Cost and Price Analysis ²		M	M	
3.	Alternative Dispute Resolution		E		
4.	Basic Cost Analysis ²		M		
5.	Basic Overhead Rates and Cost Accounting		M		
6.	Basic Price Analysis ^{1,2}		M		
7.	Contract Administration			M	
8.	Contract Law ¹			M	M
9.	Contract Law Specific to Procurement Practices Act		M		
10.	Contract Negotiation ¹				E
11.	Contracting Sealed Bidding		M		
12.	Cost Accounting for Contract Specialists	M			
13.	DC Supply Schedule	M	E		
14.	Developing an Independent Government Cost Estimate		M		
15.	Effective Customer Service	M	E	E	
16.	Ethical Conduct	M	M	M	
17.	Fundamentals of Contract Pricing	M			
18.	Fundamentals of Contracting	M			
19.	Integrated Project Teams		M	E	
20.	Intermediate Contracting		M		
21.	Local, Small, Disadvantaged Business Enterprise (LSDBE) Program	M	M		
22.	Management and Leadership Training			M	M
23.	Management for Contracting Supervisors			M	
24.	Negotiation Strategies & Techniques ¹		E		
25.	Orientation to the OCP Contracting Environment	M	M		
26.	Performance Based Contracting	M	E	E	
27.	Procurement Planning	M			
28.	Procurement Policies, Procedures, Regulation & Statutory Changes	M	M		
29.	Project Management		M	M	M
	Name of Core Course	Proficiency Level/DS Pay Grades			
		I	II	III	IV

**LIST OF MANDATORY/ELECTIVE
PROCUREMENT TRAINING CORE COURSES**

		<u>7-9</u>	<u>11-13</u>	<u>14-15</u>	<u>16 & up</u>
30.	Purchase Card Training	M	E		
31.	Resolution Dispute				M
32.	Service Level Agreements		M	M	M
33.	Simplified Acquisition Fundamentals	M			
34.	Basic Source Selection ^{1,3}		M		
35.	Supplier Quality Assurance		E		
36.	Task Order Contracting		E		
37.	Warrant Officers Training			M	M

M - Mandatory requirement according to the Career Development Training Policy (draft handbook)

E - Elective requirement according to the Career Development Training Policy (draft handbook)

¹ - 1 of 5 courses selected under a 3-year contract. Courses to be taught at 3 learning levels (basic, intermediate, and advanced).

² - Contract Pricing course combines the elements of three planned courses into one according to the contractor's course design plan.

³ - Basic Source Selection course, first of five core courses, was held on September 24-28, 2001.

Source: Office of Contracting and Procurement, Procurement Training and Career Development Institute.

SCHEDULE OF EMPLOYEE IN-HOUSE WORKSHOP COURSES

Training Course Name	Employee #1		Employee #2		Employee #3		Employee #4	
	Job Series, Grade: 1102 US B		1102 US I		1102 US R		1102 US II	
	Job Title: Contract Specialist Procurement Experience: 2 years		Contract Specialist 2 years		Contract Specialist 6 years		Contract Specialist	
	date	record	date	record	date	record	date	record
IN-HOUSE WORKSHOP COURSES								
1 Business Clearances	3/3/00	M						
1 Business Clearances								
2 Contract Tracking System: DC Pn line Solution								
3 Contracting Professional as a Business Manager								
4 CO and COTR	3/22/01	M						
5 DC Government Purchase Card Program								
6 DC Government Travel Card Program								
7 Doing Business with: Understanding Small and Business Enterprises	4/20/00	M						
8 Dun and Bradstreet: Tools for Market Research/Contractor Evaluation								
9 Electronic Commerce: Procurement in DC Government	5/16/00	T M						
10 Ethics in DC Government Contracting								
11 Government Contracting: The Basics	9/19/00	U					8/15/00	T
12 Human Care Agreement								
13 Introduction to Cost/Price Analysis			8/17/00	T	2/28/01	T M	8/17/00	T
14 Legislative Basis for Contracting in DC Government	5/9/00	T M					5/16/00	T
15 Planning and Managing the Acquisition Process	7/24/00	T M					8/22/00	T
16 Preparing for Contract Appeal/Litigation/Contract Claims	2/14/01	T M						
17 Service Level Agreement Training								
18 Source Selection	8/24/00	T					8/24/00	T
19 Statement of Work Development, Analysis, and Performance								
20 Using Technology to Improve Procurement Efficiency in DC Government	3/23/00	M						
Total completed courses		10		1		1		5

Abbreviation / Legend:

(CA) Contract Administration per Transcript record
 COR Contract Officer Representative
 COTR Contract Officer Technical Representative

M Recorded in Matrix listing
 T Recorded in Transcript record
 U Unrecorded

SCHEDULE OF EMPLOYEE IN-HOUSE WORKSHOP COURSES

Training Course Name	Employee#5		Employee#6		Employee#7		Employee#8	
	Job Series, Grade: H02 MSS H		H02 MSS H		H02 DS R		H02 DS B	
	Job Title: Contract Officer		Contract Officer		Contract Specialist		Supervisory Contract Spec	
	Procurement Experience: 2 years		2 years		7 years		2 years	
	date	record	date	record	date	record	date	record
IN-HOUSE WORKSHOP COURSES								
1 Business Clearances					6/1/00	T		
1 Business Clearances								
2 Contract Tracking System: DC P/a line Solution	11/14/00	T					11/14/00	U
3 Contracting Professional as a Business Manager					9/21/00	T	9/25/00	U
4 CO and COTR	2/15/01	T					3/22/01	U
5 DC Government Purchase Card Program							3/7/00	U
6 DC Government Travel Card Program			12/8/00	T			12/8/00	U
7 Doing Business with: Understanding Small and Business Enterprises								
8 Dun and Bradstreet: Tools for Market Research and Contract Evaluation							2/15/01	U
9 Electronic Commerce: Procurement in DC Government							5/16/00	U
10 Ethics in DC Government Contracting			1/10/01	T				
11 Government Contracting: The Basics			1/23/01	T	4/14/00	U		
12 Human Care Agreement								
13 Introduction to Cost/Price Analysis					4/21/00	T	4/21/00	U
14 Legislative Basis for Contracting in DC Government	4/25/00	T			4/25/00	T	5/9/00	U
15 Planning and Managing the Acquisition Process							5/23/00	U
16 Preparing for Contract Appeal/Litigation/Contract Claims							2/14/01	U
17 Service Level Agreement Training	8/21/00	T	8/21/00	T				
18 Source Selection					9/6/00	T		
19 Statement of Work Development, Analysis, and Performance							3/7/00	U
20 Using Technology to Improve Procurement Efficiency in DC Government	9/15/00	U						
	Total completed courses		5	4	6	12		

SCHEDULE OF EMPLOYEE IN-HOUSE WORKSHOP COURSES

Training Course Name	Employee #13		Employee #14		Employee #15		Employee #16	
	Job Series Grade: 1102 DS 8		1103 DS 9		1102 DS 9		1106 DS 7	
	Job Title: Procurement Assist		Purchasing Agent		Procurement Analyst		Procurement Technician	
	Procurement Experience: Spans				10 years		5 years	
	date	record	date	record	date	record	date	record
IN-HOUSE WORKSHOP COURSES								
1	Business Clearances		6/1/00	T	11/7/00	T		
1	Business Clearances		6/30/00	T				
2	Contract Tracking System: DC P/In line Solution							
3	Contracting Professional as a Business Manager							
4	CO and COTR							
5	DC Government Purchase Card Program				3/7/00	T		
6	DC Government Travel Card Program							
7	Doing Business with: Understanding Small and Business Enterprises							
8	Dunn and Bradstreet: Tools for Market Research/Contractor Evaluation	3/27/01	T		3/27/01	T		
9	Electronic Commerce: Procurement in DC Government				5/16/00	T		
10	Ethics in DC Government Contracting							
11	Government Contracting: The Basics	3/6/01	T	5/8/01	T			
12	Human Care Agreement							
13	Introduction to Cost/Price Analysis				5/25/00	U		
14	Legislative Basis for Contracting in DC Government				5/9/00	T		
15	Planning and Managing the Acquisition Process				5/23/00	T		
16	Preparing for Contract Appeal/Litigation/Contract Claims				4/10/01	T		
17	Service Level Agreement Training							
18	Source Selection							
19	Statement of Work Development, Analysis, and Performance							
20	Using Technology to Improve Procurement Efficiency in DC Government			9/15/00	U			
Total completed courses			2		4		8	0

Note: In-house workshop training as of June 1, 2001.

SCHEDULE OF EMPLOYEE PAST PROCUREMENT TRAINING

Training Course Name	Employee#1		Employee#2		Employee#3		Employee#4	
	Job Series, Grade 1102 US G		1102 US I		1102 US R		1102 US II	
	Job Title: Contract Specialist		Contract Specialist		Contract Specialist		Contract Specialist	
	Procurement Experience 2 years		2 years		6 years			
	date	record	date	record	date	record	date	record
PAST PROCUREMENT TRAINING (Response by Employee)								
1 Basic Procurement	1994	M						
2 Construction Contracting								
3 Contract Administration	1994	M						
4 Contract Economics	1999	M	1999	M	1999	M		
5 Contract Economics and Productivity Based Cost Reduction						M		
6 Contract Law			1997	M	1999	M		
7 Contracts the Basics	1994	M						
8 Cost / Price Analysis								
9 Customer Service					1991	M		
10 Ethics in Government Contracting		M						
11 General Public Purchasing and Materials Management						M		
12 National Association of Purchasing Managers								
13 Negotiations / Sealed Bidding								
14 PMI Performance Based Statement of Work	1999	M						
15 Statement of Work								
16 Performance Based Service Contracting								
17 Public and Procurement Contracting								
18 The Recurring Contracts Training Program		M						
<i>No Response from employee</i>								M
Total completed courses		7		2		5		0

Abbreviation / Legend:

(CA) Contract Administration per Transcript record

M Recorded in Matrix listing

SCHEDULE OF EMPLOYEE PAST PROCUREMENT TRAINING

Training Course Name	Employee/5		Employee/6		Employee/7		Employee/8	
	Job Series, Grade: H02 MSS II		H02 MSS II		H02 DS R		H02 DS D	
	Job Title: Contract Officer		Contract Officer		Contract Specialist		Supervisory Contract Spec	
	Procurement Experience: 2 years		2 years		7 years		2 years	
	date	record	date	record	date	record	Date	record
PAST PROCUREMENT TRAINING (Response by Employee)								
1 Basic Procurement							1981	M
2 Construction Contracting								
3 Contract Administration					-	M	1984	M
4 Contract Economics		M				M	1999	M
5 Contract Economics and Productivity Based Cost Reduction								
6 Contract Law						M	1986	M
7 Contracts the Basics								
8 Cost / Price Analysis						M	1986	M
9 Customer Service								
10 Ethics in Government Contracting								
11 General Public Purchasing and Materials Management								
12 National Association of Purchasing Managers		M						
13 Negotiations / Sealed Bidding						M	1987	M
14 PMI Performance Based Statement of Work								
15 Statement of Work							1987	M
16 Performance Based Service Contracting			1999	M		M		
17 Public and Procurement Contracting								
18 The Recurring Contracts Training Program								
<i>No Response from employee</i>								
Total completed courses		2		1		6		7

SCHEDULE OF EMPLOYEE PAST PROCUREMENT TRAINING

Training Course Name	Employee #9		Employee #10		Employee #11		Employee #12	
	Job Series, Grade 1102 DS 9		1102 DS 8		1105 DS 8		1101 DS 8	
	Job Title: Contract Specialist		Contract Specialist		Procurement Agent		Senior Policy Analyst (CA)	
	Procurement Experience: 8 years		8 years				12 years	
	date	record	date	record	date	record	date	record
PAST PROCUREMENT TRAINING (Response by Employee)								
1	Basic Procurement			1996	M			
2	Construction Contracting	-	M					
3	Contract Administration							
4	Contract Economics	1999	M				1999	M
5	Contract Economics and Productivity Based Cost Reduction							
6	Contract Law							
7	Contracts the Basics	1997	M	1996	M			
8	Cost / Price Analysis	1997	M	1993	M			
9	Customer Service							
10	Ethics in Government Contracting	-	M					
11	General Public Purchasing and Materials Management	-	M					
12	National Association of Purchasing Managers							
13	Negotiations / Sealed Bidding	1997	M	1994	M			
14	PMI Performance Based Statement of Work	1997	M	1999	M			
15	Statement of Work			1993	M			
16	Performance Based Service Contracting							
17	Public and Procurement Contracting					-	M	
18	The Recurring Contracts Training Program							
	<i>No Response from employee</i>							
	Total completed courses		8		6		1	1

SCHEDULE OF EMPLOYEE PAST PROCUREMENT TRAINING

Training Course Name	Employee #13	Employee #14	Employee #15	Employee #16
	Job Series, Grade: 1102 DS 3	1105 DS 9	1102 DS 9	1106 DS 7
	Job Title: Procurement Assist	Purchasing Agent	Procurement Analyst	Procurement Technician
	Procurement Experience: 5 years	-	1 years	5 years
PAST PROCUREMENT TRAINING (Response by Employee)				
1 Basic Procurement				
2 Construction Contracting				
3 Contract Administration				
4 Contract Economics			M	
5 Contract Economics and Productivity Based Cost Reduction				
6 Contract Law				
7 Contracts the Basics				
8 Cost/Price Analysis				
9 Customer Service			M	1997 M
10 Ethics in Government Contracting				
11 General Public Purchasing and Materials Management				
12 National Association of Purchasing Managers				
13 Negotiations / Sealed Bidding				
14 PMI Performance Based Statement of Work				
15 Statement of Work				
16 Performance Based Service Contracting				
17 Public and Procurement Contracting				
18 The Recurring Contracts Training Program				
<i>No Response from employee</i>		M	M	
Total completed courses		0	0	2 1

Note: Past training as of June 1, 2001.

Source: Office of Contracting and Procurement.

OCP RESPONSES TO THE DRAFT REPORT FINDINGS AND RECOMMENDATIONS

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Office of Contracting and Procurement

Director



May 23, 2002

Charles C. Maddox, Esq.
Inspector General
Office of the Inspector General
717 14th Street, NW
Washington, DC 20005

Dear Mr. Maddox:

Enclosed you will find the Office of Contracting and Procurement's response to the draft audit report (OIG No. 01-1-04MA) received May 3, 2002 on procurement training activities conducted by this office.

Overall we are extremely proud of the aggressive training initiative we have launched to provide training and professional development opportunities for our employees despite very limited resources. This program has continually evolved and improved over the last two fiscal years from a program designed to provide performance support workshops to a comprehensive program which provides the most in-depth training on District of Columbia procurement rules and regulations available in the public or private sectors. As more resources have become available, more has been allocated to training and educational programs. Thus, many of the findings and recommendations presented in this report have already been addressed, and are reflected in our comments.

Should you have any questions, please feel free to contact me.

Sincerely,



Jacques Abadie, III CPCM
Chief Procurement Officer

cc: John A. Koskinen, Deputy Mayor and City Administrator
William J. Divello, Assistant Inspector General for Audits

441 4th Street N.W., Suite 800 South, Washington, D.C. 20001
(202) 727-0252 Fax: (202) 724-5673

**OCP RESPONSES TO THE DRAFT REPORT FINDINGS AND
RECOMMENDATIONS**

**Response to Office of Inspector General
Audit of the
Office of Contracting and Procurement's Training Program
(OIG No. 01-1-04MA)**

Submitted By:

**Jacques Abadie, III CPCM
Chief Procurement Officer**

May 21, 2002

2

OCP RESPONSES TO THE DRAFT REPORT FINDINGS AND RECOMMENDATIONS

Introduction

The Office of Contracting and Procurement began an organized training and professional development program for its employees in March 2000. In this program special emphasis was placed on training for those procurement personnel in 1102-series positions who primarily serve as contract specialists and contracting officers and are chiefly responsible for the procurement of goods and services in the District.

We believe that some clear distinctions should be made between the types of training and skill development tools that were provided by the agency during the period covered by the OIG audit and the underlying intent of the training. These include: information sessions, performance support workshops and training courses. Information sessions and performance support workshops were temporary tools designed to keep procurement personnel abreast of changes in agency policies and procedures, implementation of new programs (e.g. Purchase/Travel Card program) or to provide information on the same. Training courses, though limited in depth, provided hands-on skill development training needed by persons performing the procurement functions noted above. It is important to state that OCP never viewed these sessions as "comprehensive" training intended to provide or substitute for the in-depth training we knew was required. They were, however, intended to serve only as a temporary solution to the immediate needs of our staff until such time as funding could be identified to develop and implement training in several core procurement areas.

Responses to Specific OIG Findings and Recommendations

1. Verify educational background and prior formal procurement training taken by employees.

Verifications of previous employment and the educational backgrounds of all employees are completed during the employment screening process conducted by the District of Columbia Office of Personnel. We are assured at the time of employment that employees' credentials, including education and previous work history have been determined to be true and correct. We believe that for OCP to establish a separate, yet duplicative, process is an inefficient use of our agency's already limited resources.

Once the employee has joined the agency's staff, however, we have in place a process to establish training baselines for each employee in several key procurement areas. Since October 1, 2002, OCP has required that contracting personnel within the 1102-series provide copies of certificates from educational institutions or other organizations where procurement-related training has been completed. Additionally, those staff claiming certification by the nationally recognized procurement organizations (e.g. National Institute of Government Purchasers and National Contract Management Association) must provide copies of their certifications and/or a letter that confirms the certification is still in force. Both organizations have

Response to OIG No. 01-1-04MA

OCP RESPONSES TO THE DRAFT REPORT FINDINGS AND RECOMMENDATIONS

stringent educational requirements for both initial certification and maintenance of that certification. We believe that these methodologies provide ample verification of prior educational background and previous procurement training received by our employees in the contracting job series.

2. Put in place a comprehensive skills assessment of OCP employees.

We concur with the Office of Inspector General's recommendation that a comprehensive skills assessment is needed of OCP employees. The effectiveness of our contracting personnel requires that they not only have knowledge of procurement laws, regulations and current practices, but that they be able to apply that knowledge in making sound business decisions. By doing so, we ensure that the District government gets the best deal and that agencies receive the quality goods and services they require in a timely manner. Therefore, we must be assured that staff has the entire range of foundation (reading, writing, oral communication and analytical skills) as well as technical and interpersonal skills. Such skills cannot be discerned from a resume but are still required for procurement personnel to perform at the highest levels. Completion of an assessment will enable OCP to more strategically deploy its training resources to those areas most needed by its personnel.

OCP has identified an organization external to the District government that offers an integrated employee assessment system currently used by over 24 Fortune 500 companies, several colleges and universities and ten State and local governments to identify the skills employees need for success on the job and to objectively evaluate individual training needs. Based on the Independent Government Cost Estimate obtained for providing the needed assessment services, sufficient resources will be available in FY 2003 to conduct employee assessments.

3. Design and individual development plan for each employee, taking into consideration individual training needs, minimum training requirements, and career development.

This recommendation was successfully implemented at the start of FY 2002 on October 1, 2001.

With the advent of the Management Supervisory Service in FY 2001, the Office of Personnel required that all MSS-designated employees have in place Individual Development Plans (IDPs). Since the start of this fiscal year in October 2001, however, OCP has mandated that *all* employees, regardless of employment category also have an IDP in place. Each plan addresses the individual training needs of the employee based not only on those job duties and responsibilities they currently perform, but training required to meet long and short-term career goals.

OCF RESPONSES TO THE DRAFT REPORT FINDINGS AND RECOMMENDATIONS

Further, we recognize that procurement practices, tools and techniques are continuously changing to meet the needs of a more dynamic, technology-driven marketplace. Therefore, we have gone a step beyond what is now minimally required by the Office of Personnel to mandate inclusion in the IDP a minimum of three procurement courses annually by all 1102-series staff. This requirement will address not only the training needed by contracting personnel who need to address skills deficits, but also ensure that our most senior agency personnel continue to refresh and keep their skills current. What is important to note in this process, however, is the selection of those courses is done by the employee in consultation with his or her supervisor and is individualized to the employee's specific needs.

Training conducted via these IDPs is carefully monitored. Our training unit has been charged with reporting monthly on those persons who are receiving training in accordance with training identified in their plans.

4. Strengthen the existing training program through alternative solutions, including the use of free or low-cost outside training.

The recommendation by the OIG that OCF strengthen the existing training program through alternative solutions, including the use of free or low-cost outside training is not realistic given what we know to be available in the marketplace.

During January and February of 2000, we conducted an extensive survey of area organizations with existing procurement training programs. This research included such wide-ranging organizations as the Office of Federal Procurement Policy, the Treasury Acquisition Institute, the Defense Acquisition University, all of the area universities including the University of the District of Columbia, the major national contracting associations, and a host of private sector providers identified through the General Services Administration certified to conduct 1102-series training. We quickly learned that:

- All of the training was based solely on the Federal Acquisition Regulations (FAR) which do not address some of the unique aspects of procurement in the District of Columbia as governed by DCMR 27 and the Procurement Practices Act;
- None of the training was "free" or "low-cost", even through the University of the District of Columbia;
- What was described in many cases as "free" training by private sector providers was determined to be little more than 2-4 hour briefing sessions generally designed to market their materials and/or products; and
- Pricing ranged from an estimated \$500 per student to a high \$2,400 per student at some of the area universities.

OCP RESPONSES TO THE DRAFT REPORT FINDINGS AND RECOMMENDATIONS

Therefore, utilizing the limited resources available that we decided to strategically conduct procurement training using in-house personnel and to also use available within the District government through the Center for Workforce Development to provide computer, foundation and management development training. These small efforts were by no means intended to replace the substantive training needed, but instead to serve as skill refreshers and performance supports to prepare the staff for the more in-depth training planned the following year.

This year we are proud that we have implemented the comprehensive training program we envisioned, providing rigorous five day training courses, based on District of Columbia procurement law and regulations. Courses are currently being offered or under development in five core areas, including: Basic, Intermediate and Advanced levels of Source Selection; Contract Pricing; Contract by Negotiation; Contract Law and Negotiation Strategies and Techniques.

We continue to offer internally developed and trained courses in the areas of Contracting Ethics, Statement of Work Writing, and Contracting Officer's Technical Representative (COTR). But we have enhanced the content to make classes more rigorous and comparable to courses available elsewhere.

5. Move rapidly toward establishing an automated database system that meets the agency requirements, preferably designing or adopting a procurement training module to be compatible or a part of any planned comprehensive procurement management information system.

In November 2001, the District's Office of the Chief Technology Officer announced its implementation of the Administrative Services Modernization Program. A key component of that program is the automation of many human resources functions, including maintenance of a database and tracking of all employee training and development activity. This system will have the capacity to collect data on training successfully completed by employees through District agencies, as well as educational institutions outside the government.

Our training manager has participated in focus groups conducted by OCTO's contractor on the design of this system and we believe that it will address the concerns outlined in the OIG report regarding the need for an automated database system. Therefore, we do not believe that it is appropriate to expend agency resources for a system that would be duplicative of efforts already underway.

OCP RESPONSES TO THE DRAFT REPORT FINDINGS AND RECOMMENDATIONS

6. Finalize the draft handbook, including completing student profile forms and adding minimum training requirements.

Finalization of the draft handbook is underway and will be completed by the end of August 2002. The handbook will be ready for distribution at the start of the next fiscal year in October.