

February 10, 2023

Recommendation Memo for the Acting Chief Operating Officer

FROM	Joshua Galicki, Acting Senior Procurement Executive
SUBJECT	Publication of FY 2021 Service Contract Inventory Analysis and Plan for FY 2022 Service Contract Inventory Analysis

Recommendation

I recommend you approve release of the FY 2021 Service Contract Inventory Analysis and the Plan for FY 2022 Service Contract Inventory Analysis.

Timing Considerations

The deadline for the CFPB to release the report is February 21, 2023.

Background

The Office of Management and Budget’s (OMB) memoranda dated November 5, 2010, and December 19, 2011, provide agencies with guidance for complying with Section 743 of Division C of the FY 2010 Consolidated Appropriations Act, P.L. 111-117, which “requires civilian agencies to prepare an annual inventory of their service contracts and to analyze the inventory to determine if the mix of Federal employees and contractors is effective or if rebalancing may be required” (19 December 2011).

Release Plan

The Service Contract Inventory operates on a two-year schedule: after the close of each fiscal year, agencies collect data on service contracting and prepare a plan for detailed analysis. Execution of the plan (i.e., analysis of the data and contracts) is then performed over the course of the following fiscal year. Once approved, the analysis of FY 2021 service contracting and plan for analysis of 2022 service contracting will be posted on the OMB MAX system. Following OMB’s acceptance, the analysis and plan will be posted at consumerfinance.gov/open and a Federal Register Notice will be published announcing their availability.

Attachments

- Tab 1: Draft Decision Memorandum from the Acting Chief Operating Officer
- Tab 2: Memo re FY21 Analysis and FY22 Plan
- Tab 3: FY 22 PSC Summary
- Tab 4: FY 21 SCI Analysis

Recommendation Memo Reviewer Sheet

Subject/Document Title Publication of FY 2021 Service Contract Inventory Analysis and Plan for FY 2022 Service Contract Inventory Analysis		
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Consumer Financial Protection Bureau
1700 G Street NW
Washington, D.C. 20552



Decision Memorandum from the Acting Chief Operating Officer

FROM	Jean Chang
TO	Joshua Galicki, Acting Senior Procurement Executive
SUBJECT	FY 2021 Service Contract Inventory Analysis and Plan for FY 2022 Service Contract Inventory Analysis

I approve release of the FY21 Service Contract Inventory Analysis and Plan for FY22 Service Contract Inventory Analysis.

Jean Chang
Acting Chief Operating Officer
Consumer Financial Protection Bureau

Date

Consumer Financial Protection Bureau
1700 G Street NW
Washington, D.C. 20552



February 21, 2023

Memorandum for the Executive Office of the President, Office of Management and Budget, Office of Federal Procurement Policy

FROM	Joshua Galicki, Acting Senior Procurement Executive, Consumer Financial Protection Bureau, Office of Finance and Procurement
SUBJECT	Service Contract Inventory – FY 2022 Service Contract Inventory and Planned Analysis and FY 2021 Service Contract Inventory Analysis

Section 743 of Division C of the FY 2010 Consolidated Appropriations Act, Pub. L. 111-117, and the Executive Office of the President, Office of Management and Budget’s (OMB) memoranda dated November 5, 2010 and December 19, 2011 on “Service Contract Inventories” require civilian agencies to submit data on an annual basis with respect to service contract inventories, as follows¹:

- 1) An analysis of FY 2021 inventory,
- 2) Planned analysis of selected Product Service Codes (PSC) for FY 2022 (analysis to be completed in FY 2023).

The purpose of this memorandum is to identify the FY 2022 service contract inventory and provide the FY 2021 service contract inventory analysis.

Attachment 1 is a summary report of the CFPB’s ten largest service contract obligations and special interest functions as identified by OMB. No additional special interest functions were identified by the CFPB that are not already listed on the summary report.

¹ See also, Sept. 20, 2016 memo on “FY 2016 Service Contract Inventories” from Anne Rung, Administrator for Federal Procurement Policy.

Table 1 identifies special interest functions from the CFPB’s FY 2022 inventory which will be the subject of a focused analysis in FY 2024.

TABLE 1: FY 2022 FUNCTIONS FOR ANALYSIS IN FY 2024

Product Service Code (PSC)	PSC Description	FY 2022 Obligation \$	% Total Obligations
DA10	IT And Telecom - Business Application/Application Development Software As A Service (SAAS)	\$ 10.2M	7%
R799	Support - Management: Other	\$ 5.0M	4%

Of the top ten PSCs by obligation for FY 2022, six have been analyzed in recent Service Contract Inventory analyses. One of the four remaining PSCs among the top ten, DA10, was selected. PSC R799 was selected as it is part of the OMB special interest list and it also differs in nature from the other PSC selected for analysis.

As part of the FY 2022 inventory analysis, the CFPB will monitor/evaluate contracted services to determine whether contractor personnel perform critical agency functions that could affect the CFPB’s ability to maintain control of its mission and operations.

Attachment 2 is the FY 2021 Service Contract Inventory Analysis.

Questions regarding this memorandum may be referred to Joshua Galicki (email: Joshua.Galicki@cfpb.gov) or Nikki Burley (email: Nikki.Burley@cfpb.gov).

1.1 Enclosure(s)

Attachment 1: FY 2022 PSC Summary

Attachment 2: FY 2021 SCI Analysis

CFPB FY 22 Service Contract Inventory - PSC Summary

Top PSCs by Obligation			
Code	Product or Service Description	FY 22 Obligations	% of Total
R408	Support- Professional: Program Management/Support	\$ 27,104,671	19%
D399	IT And Telecom- Other It And Telecommunications	\$ 13,554,357	10%
R410	Support- Professional: Program Evaluation/Review/Development	\$ 13,165,772	9%
R699	Support- Administrative: Other	\$ 11,032,118	8%
DA10	IT And Telecom - Business Application/Application Development Software As A Service	\$ 10,248,984	7%
D302	IT And Telecom- Systems Development	\$ 5,884,858	4%
R799	Support- Management: Other	\$ 5,031,583	4%
R499	Support- Professional: Other	\$ 4,693,025	3%
D313	IT And Telecom- Computer Aided Design/Computer Aided Manufacturing (CAD/CAM)	\$ 4,077,150	3%
G009	Social- Non-Government Insurance Programs	\$ 3,635,410	3%

OMB Special Interest PSCs			
Code	Product or Service Description	FY 22 Obligations	% of Total
B505	Cost Benefit		
D302	IT and Telecom- Systems Development	\$ 5,884,858	4%
D307	IT and Telecom- IT Strategy and Architecture		
D310	Cyber Security and Data Backup		
D314	System Acquisition Support		
R406	Policy Review/Development		
R407	Program Evaluation Services		
R408	Support- Professional: Program Management/Support	\$ 27,104,671	19%
R409	Program Review/Development Services		
R413	Specifications Development		
R414	Systems Engineering		
R423	Intelligence		
R425	Engineering/Technical	\$ 921,082	1%
R497	Personal Services Contracts		
R499	Support - Professional: Other	\$ 4,693,025	3%
R699	Support - Administrative: Other	\$ 11,032,118	8%
R707	Contract/Procurement/Acquisition Support	\$ 91,102	0%
R799	Support - Management: Other	\$ 5,031,583	4%

FY 2021 Service Contract Inventory Analysis

Office of Finance and Procurement, Consumer Financial Protection
Bureau
1700 G St NW, Washington DC

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1. Introduction

The Consumer Financial Protection CFPB (CFPB or Bureau) was established on July 21, 2010 under Title X of the Dodd-Frank Wall Street Reform and Consumer Protection Act Public Law No. 111-203 (Dodd-Frank Act). The CFPB was established as an independent bureau within the Federal Reserve System. The CFPB is an Executive agency as defined in Section 105 of Title 5, United States Code.

The Dodd-Frank Act authorizes the CFPB to exercise its authorities to ensure that, with respect to consumer financial products and services:

1. Consumers are provided with timely and understandable information to make responsible decisions about financial transactions;
2. Consumers are protected from unfair, deceptive, or abusive acts and practices and from discrimination;
3. Outdated, unnecessary, or unduly burdensome regulations are regularly identified and addressed in order to reduce unwarranted regulatory burdens;
4. Federal consumer financial law is enforced consistently in order to promote fair competition; and
5. Markets for consumer financial products and services operate transparently and efficiently to facilitate access and innovation.

The CFPB has continued its efforts to listen and respond to consumers and industry, to be a resource for the American consumer, and to develop into a great institution worthy of the responsibility Congress has conferred on it.

The CFPB's Office of Finance and Procurement is committed to enhancing transparency and ensuring proper financial stewardship throughout the acquisition lifecycle. To achieve this, the CFPB's Office of Finance and Procurement has prepared this report using the most recent instructions from the Office of Management and Budget (OMB). This report provides an analysis of CFPB's service contract inventory to determine if the mix of Federal employees and service contractors is effective.

1.1 Background

In accordance with the Office of Management and Budget, agencies shall conduct a meaningful analysis of the data in their service contract inventory for the purposes of determining if contract labor is being used in an appropriate and effective manner, and if the mix of Federal employees and contractors in the CFPB is effectively balanced. The analysis shall cover the elements called for in the relevant guidance and include any agency findings, any actions taken or planned by the agency to address any identified weaknesses or challenges, and a description of the methodology used by the agency to support its analysis. Agencies shall post their analysis in the OMB MAX system once completed.

1.2 Scope of Analysis

The Office of Finance and Procurement staff has analyzed the CFPB’s service contract inventory from FY 2021 to validate program requirements, including appropriate contract use and effectiveness, to determine if the mix of Federal employees and service contractors is balanced. Table 1 identifies Product Service Codes (PSCs) selected by the Office of Finance and Procurement. The analysis includes all service contract awards against selected PSCs exceeding \$25,000 and funded by the CFPB in FY 2021.

TABLE 1: CFPB PRODUCT SERVICE CODES

PSC	PSC Description	FY 2021 Obligation Dollars	Representative Contract Actions
R425	Support- Professional Engineering/Technical	\$ 910,195	2
U009	Education/Training- General	\$ 3,739,312	14

Of the top ten PSCs by obligation, eight have been analyzed in recent Service Contract Inventory analyses. We selected one of the remaining two, U009, which represents a significant portion of obligations. We also selected R425 as it was included in OMB’s list of PSCs designated with special interest.

The review team has conducted a review of each contract for the PSCs identified in Table 1. Specifically, the Office of Finance and Procurement has analyzed the Statement of Work or Performance Work Statement, as well as any Quality Assurance Surveillance Plan and past performance reviews, for each contract.

1.3 Methodology

The CFPB's scope of analysis is assessed by a use-case evaluation approach. The analysis is focused on the following areas:

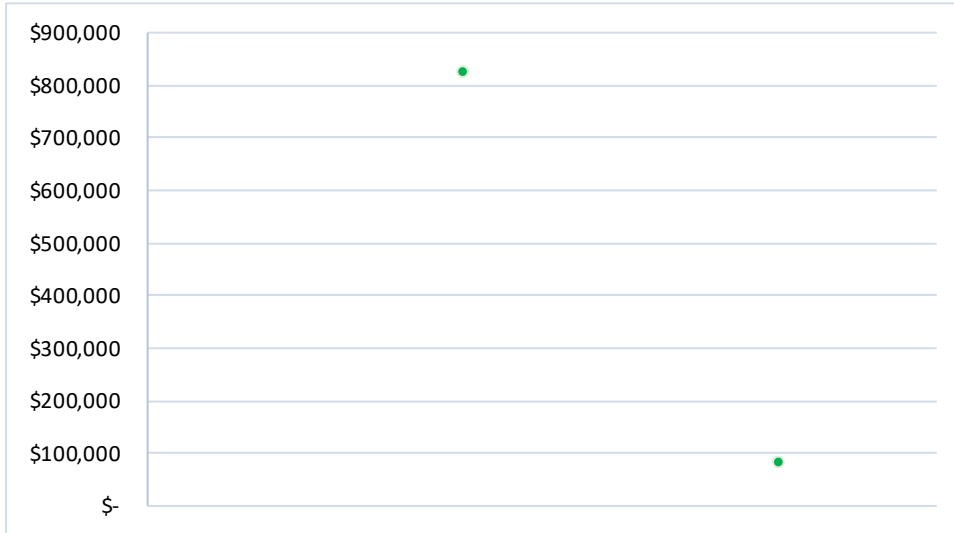
- a) Gauging if services are being used appropriately for the CFPB's mission;
- b) Ensuring CFPB service contracts are being provided with appropriate and sufficient oversight; and
- c) Identifying necessary improvements to the service-related acquisition practices of the CFPB.

The below list details the data gathering elements collected by the review team:

- Contract files
- Contract monitoring practices, mechanisms, and performance standards

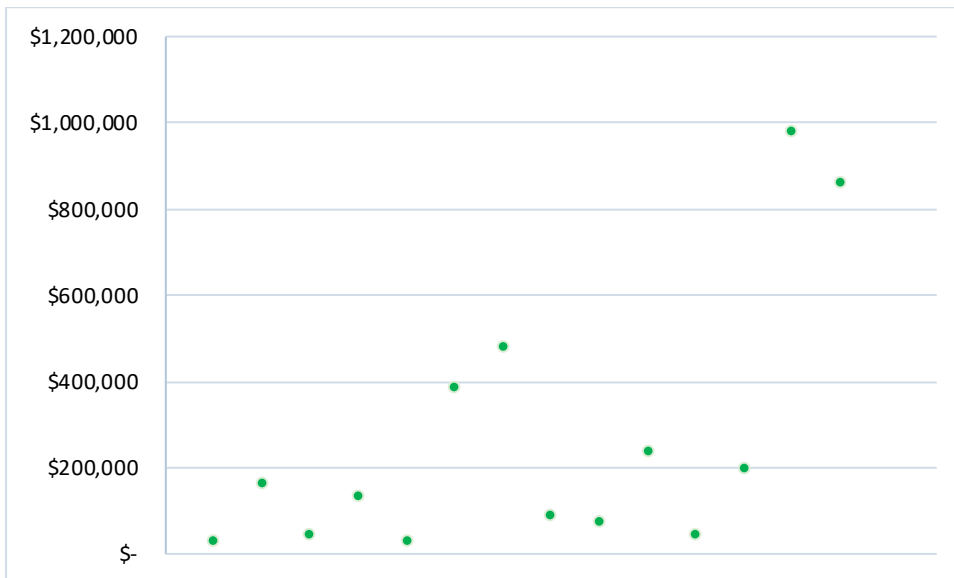
Figures 1 and 2 illustrate the obligation dollars for each relevant action by PSC.

FIGURE 1: PSC R425 – ACTION OBLIGATIONS



For PSC R425, the resultant 2 actions are depicted in Figure 1. The obligation dollars for the actions are \$83,520 and \$826,675, totaling \$910,195.

FIGURE 2: PSC U009 – ACTION OBLIGATIONS



For PSC U009, the resultant 14 actions are depicted in Figure 2. The obligation dollars range in value from a low of \$29,073 to a high of \$981,464, totaling \$3,739,312.

Tables 2 and 3, below, detail the relevant contract actions issued under each PSC.

TABLE 2: PSC R425 CONTRACT ACTION DETAILS

Vendor Name	Description of Requirement	Action Obligation
VINSYS-RADIANT LLC	MOBILITY SUPPORT SERVICES (BASE AWARD)	\$ 826,675
VINSYS-RADIANT LLC	MOBILITY SUPPORT SERVICES (FUNDING MOD)	\$ 83,520

TABLE 3: PSC U009 CONTRACT ACTION DETAILS

Vendor Name	Description of Requirement	Action Obligation
ISpot.TV, INC.	ISpot.TV DEBT RELIEF MONITORING TOOL AND SERVICES	\$ 30,326
CAPITAL MARKETS COMPANY, THE	FINANCIAL COMPLIANCE TRAINING SERVICES	\$ 160,583
CITIBANK, N.A.	ABA STONIER 2021 - GRADUATE SCHOOL OF BANKING (PURCHASE CARD)	\$ 42,185
GEORGE WASHINGTON UNIVERSITY, THE	THE GEORGE WASHINGTON UNIVERSITY EXECUTIVE EDUCATION PROGRAMS	\$ 130,500
COMPUSEARCH VIRTUAL ACQUISITION OFFICE LLC	VAO SUBSCRIPTION	\$ 29,073
ICF INCORPORATED, L.L.C.	TAX TIME EDUCATIONAL CAMPAIGN SUPPORT SERVICES	\$ 384,072
ICF INCORPORATED, L.L.C.	START SMALL SAVE UP INITIATIVE	\$ 480,889
ICF INCORPORATED, L.L.C.	LIVE WEBINAR SERVICES	\$ 89,175
ICF INCORPORATED, L.L.C.	WEBINAR DEVELOPMENT	\$ 73,230
ICF INCORPORATED, L.L.C.	ELDER FRAUD PREVENTION AND RESPONSE NETWORKS (BASE AWARD)	\$ 234,775
ICF INCORPORATED, L.L.C.	ELDER FRAUD PREVENTION AND RESPONSE NETWORKS (FUNDING MOD)	\$ 43,236
ICF INCORPORATED, L.L.C.	RESOURCE GUIDE FOR K-12	\$ 197,205
ICF INCORPORATED, L.L.C.	YOUR MONEY YOUR GOALS (YMYG) TRAINING AND TECHNICAL ASSISTANCE	\$ 981,464
FAMILY HEALTH INTERNATIONAL	DIGITAL PLATFORM SERVICES	\$ 862,598

2. Summary of Findings

In accordance with the Consolidated Appropriations Act, 2010, Division C, Title VII §743(e), the CFPB has ensured through its analysis that:

- The CFPB is giving special management attention to functions closely associated to inherently governmental functions;
- The CFPB is not using contractor employees to perform inherently governmental functions;
- The CFPB has specific safeguards and monitoring systems in place to ensure that work being performed by contractors has not changed or expanded during performance to become an inherently governmental function;
- The CFPB is not using contractor employees to perform critical functions in a way that could affect the agency's ability to maintain control of its mission and operations;
- There are sufficient internal agency resources to manage and oversee contracts effectively; and
- No contracts have been identified as poorly performed because of excessive costs or inferior quality.

2.1 PSC R425: Support-Professional: Engineering/Technical

Product Service Code R425 is selected for review as it makes up one of the highest percentages of overall CFPB service contract obligations and it has not been included in previous analyses. Vinsys-Radiant, LLC was the vendor for both actions awarded under this PSC for FY 2021 with a base award and related funding modification.

In the second quarter of FY 2021, the CFPB awarded a contract to Vinsys-Radiant, LLC for mobility support services. Specifically, Vinsys-Radiant was contracted to assist the CFPB in its goals to expand its mobile footprint to provide secure access to CFPB applications and services to its remote workforce on CFPB devices. This award included a base period of one year plus two option years. The services for this award were classified as critical functions but not

inherently governmental. Per the service contract risk mitigation plan, “Government surveillance of contractor performance will occur to give reasonable assurance that efficient methods and effective cost controls are being used.” The CFPB assigned an experienced Level II COR in the Office of Technology & Innovation to oversee and manage performance, and the COR noted the contractor “was able to execute all requirements which has benefited CFPB greatly” and they would recommend this vendor for similar requirements in the future. The FY 2021 action was a modification to incrementally fund one of the line items from the base award. All of the other terms and conditions from the base award were unchanged and applied to the modification.

2.2 PSC U009: Education/Training- General

We selected Product Service Code U009 for analysis because we have not analyzed this type of service in previous reports, and because it is included in OMB’s list of PSCs designated with special interest. The CFPB contracted with a total of seven vendors for these services:

- The Capital Markets Company
- American Bankers Association (Via CitiBank)
- Unison Software (DBA Compusearch Software Systems)
- Family Health International
- George Washington University
- iSpot.TV
- ICF Incorporated

The CFPB awarded a definitive contract to The Capital Markets Company for financial compliance training services in FY 2016. The training was mainly for CFPB’s examination and supervision function to understand the business operations of financial institutions that would be examined by the agency. The award also included training for the consumer complaint response center and enforcement staff. These services were deemed necessary to ensure the readiness of the CFPB workforce and its operational capacity to fulfill its mission. The service contract coding document for these services certified that the requirement did not involve an inherently governmental function. Furthermore, it stated the CFPB considered proper workforce balancing when fulfilling this requirement. As this contract approached its end date,

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a four-month extension was awarded in the second quarter of FY2022 to maintain services while a larger award was recompeted. This extension award used all the terms and conditions from the larger previous award. Experienced Level II CORs oversaw both the initial award and the extension.

In the third quarter of FY 2021, the CFPB awarded a contract for tuition to the American Banker's Association (ABA) Stonier Graduate School of Banking program via a purchase card matching order with CitiBank. This process is typically used when a vendor does not have access to the federal government's online invoicing platform and thus a credit (purchase) card is used as the payment vehicle. CitiBank routes the funds from the CFPB to the vendor. The CFPB sent thirteen employees with the aim of broadening the supervisory examiner's knowledge of the banking industry and bank regulation, and master concepts of lending, financial management, general management, leadership, and decision-making. This period of performance totaled five months in order to cover the first year of the training program. The services included were available from only one source which is outside the federal government and was thus only suited for a contractor as opposed to CFPB personnel. The CFPB assigned an experienced Level II COR in the Office of Supervision Examinations to oversee and manage performance, and the COR did not identify this contract as poorly performed.

At the end of the second quarter of FY 2021, CFPB awarded a sole source contract to Unison Software, Inc. (DBA Compusearch Software Systems) for its annual subscription to the Virtual Acquisition Office (VAO). VAO is a knowledge and productivity subscription service designed to keep acquisition professionals across the Federal Government apprised of changes in procurement legislation, policies, regulations, and oversight reports. The CFPB purchased twenty-five licenses to the service for a full calendar year. The services purchased do not include any mission-critical or inherently governmental functions. A Level III COR was assigned to this award.

In October 2020, the CFPB awarded a GSA task order to Family Health International for digital platform services. It was a non-personal services contract with the objective of continued development of the CFPB building blocks teacher web pages. The period of performance was twelve months with no additional option periods. While the services were deemed not inherently governmental, a Quality Assurance Surveillance Plan (QASP) was included in this award. The plan called for evaluation of performance via random monitoring and periodic inspections. The services were overseen by an experienced Level II COR.

In the first quarter of FY 2021, CFPB awarded a purchase order to The George Washington University for twenty participants in its Executive Education Program focusing on project management. Improvements in efficiency for ongoing projects and operations were cited as goals. The courses were broken up into three modules of virtual, instructor-led training sessions. Certificates of completion were awarded at the end of the program which spanned six months. It was determined there was no available off-the-shelf course to fit this requirement. A Level III COR who was also one of the participants was assigned to monitor services.

In August 2021, the CFPB awarded a contract to iSpot.tv Inc. for a debt relief advertising monitoring tool. The goal was to track debt relief marketing to analyze trending debt problems for consumers. This provided the CFPB with data-driven advice on emerging areas of concern in this field. The award included a base period of one year plus four one-year options periods. A QASP was included in the award that included evaluations of quality of service, service outages, and timeliness of data provided. It also called for “spot checks” of all aspects of the requirement. Two Level I CORs were assigned to the award.

Lastly, the CFPB awarded a total of seven task orders from FY 2019-2021 against a Consumer Education and Engagement Training BPA with ICF Incorporated. These task orders focused on educating consumers on topics including proper tax filing, financial literacy, saving habits and protecting against elder fraud. All the task orders were deemed to be non-inherently governmental in nature. Four of the orders were also considered “low risk” in the service contract coding. The remaining three orders were considered “closely associated/high risk” and each included a QASP to mitigate risk. Six of the orders were assigned Level III CORs while the seventh was assigned a Level II COR.

2.3 Analysis

The analysis is completed using the protocols and methods outlined in Section 1.3, with special attention given to answering the five questions below.

1. Is the contractor performing a function that is “mission critical”?
2. Does the contract requirement include inherently governmental functions?
3. Does the contract requirement include unauthorized personal services either in the work statement or in contract operation?

4. In the case of work closely associated to inherently governmental functions, or non-competitive contracts, was special consideration given to using Federal government employees?
5. Are sufficiently trained and experienced officials available within the CFPB to manage and oversee the contract administration function?

2.3.1 Are contractors performing a function that is mission critical?

In the case of this analysis, many of the contracted functions are deemed mission critical. The CFPB finds that the contractors provided needed capacity, expertise, as well as flexibility and that the detailed contract specifications and CFPB oversight with effective COR involvement mitigated any possibility of contractors performing inherently governmental functions. As stressed across the CFPB, contractors are not authorized approvers regarding decisions to implement guidance or policies at the CFPB. The responsibility for enacting policies and procedures, executing acquisitions, and pursuing enforcement actions remains with the government workforce at the CFPB. In addition, the CFPB provides sufficiently trained officials and CORs that can proactively oversee the contract administration function.

2.3.2 Do contractual requirements include inherently governmental functions?

The CFPB's contractual support requirements do not include inherently governmental functions and, as such, there is little possibility of contractors performing inherently governmental work.

2.3.3 Do contractual requirements include unauthorized personal services?

The CFPB does not have any contracts or contractual requirements that include unauthorized personal services.

2.3.4 If performance is closely associated to inherently governmental functions, or in non-competitive

acquisitions, was consideration given to utilizing Federal employees prior to acquisition?

General consideration is given to fulfilling needs with existing government employees prior to synopsis requirements. To comply with OFPP's Policy Letter 11-01, the CFPB has established a pre-acquisition service code determination checklist built into the online procurement system. This entry is required for service contract obligations over \$25,000, ensuring adequate review and documentation is complete to avoid any unnecessary "inherently governmental" contract work. A Service Contract Coding determination is required prior to award and documents that the requirement has been vetted and approved by the program office and the Contracting Officer, certifying both a balanced workforce approach and appropriate exercise of discretion.

2.3.5 Are sufficiently trained and experienced officials available within the CFPB to manage and oversee contract administration functions?

Regarding performance related to the PSCs studied in this report, the CORs, Contracting Officers, and Program Managers involved in the contract actions reviewed are sufficiently trained and required to maintain their certification requirements in effective management techniques and oversight of critical/non-critical support services. The CFPB has maintained its expanded COR workforce to ensure that each program office has sufficiently trained employees capable of contract administration. To support this enhancement, four dedicated COR Advisors in the Office of Finance and Procurement serve as experts on all aspects of contract administration and advise the COR workforce to ensure compliance on all CFPB contracts. The Office of Finance and Procurement also offers regular COR training and guidance. As of January 2023, the CFPB has 234 certified CORs.

3. Business Process Improvement Opportunities

The CFPB's Office of Finance and Procurement has implemented strategies aimed at ensuring that service contracts are managed effectively, and that the potential for performing inherently governmental work is avoided. These efforts have been categorized into two groups:

1. Ongoing process improvements
2. Recommended process improvements

3.1 Ongoing Process Improvements

The CFPB recognizes the need to continue the forum for CORs/program managers to share not only best practices, but also topics such as contract administration techniques and general contract questions. The CFPB's Office of Finance and Procurement continues to host monthly COR roundtable meetings aimed at maintaining and enhancing the professional development of staff sharing ideas, values, and strategies across the COR workforce. These meetings are a forum for discussing current procurement topics and have spawned individual training sessions in program offices throughout the CFPB. Training sessions include topics such as invoice review, contract administration, file/record maintenance, accruals, personal and non-personal services contracts, proper government-contractor relationships, and contractor on/off-boarding procedures.

The Office of Finance and Procurement also has robust internal reports that share contract information, contractor and COR-driven reporting, and obligation profiles. Additional emphasis is placed on the evaluation of contractor performance through periodic internal reviews of Contractor Performance Assessment Reporting System (CPARS) compliance and quality checks. Other oversight mechanisms used by CFPB include the use and enhancement of a procurement dashboard which provides an overview of all contract obligations by fiscal year quarters and associated number of transactions processed. The dashboard is available to all

CFPB employees to include upper management and allows users to drill into the data to view and understand top obligation dollars by vendor.

The CFPB maintains a COR Advisor team within the Office of Finance and Procurement. The COR Advisors are specifically responsible for overseeing COR functions and training to help centralize and strengthen contract administration across the CFPB. These experienced individuals serve as internal consultants in all matters of contract administration. In FY 2021 the CFPB's Office of Finance and Procurement instituted a COR revamp and has worked with client offices to receive feedback on the COR Advisor services in order better improve service delivery moving forward.

3.2 Recommended Process Improvements

The recommendations below provide the CFPB with additional process improvement steps resulting from consideration of the FY 2021 service contract inventory:

1. Continue to implement COR Advisor recommendations from our COR community and further strengthen relationships between this team and the program office acquisition contacts, to strengthen and centralize contract administration oversight.
2. Further enhance and improve the procurement dashboard to enable more comprehensive views into contract awards such as minority and women owned business participation regardless of business size.
3. Continue COR awareness efforts, promoting training and encouraging COR Level II/III certification for those CORs administering more complex services contracts.
4. Minimize the use of Labor Hour and Time-and-Material contracts and maximizing the use of Firm-Fixed-Price contracts where appropriate.

4. CFPB Senior Management Official

The senior management official accountable for developing the CFPB's policies, procedures, and training associated with OFPP's Policy Letter 11-01 is the Acting Senior Procurement Executive, Joshua Galicki.