

APPENDIX - CC Army Procurement Management Review Program

(October 1, 2014)

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APPENDIX_CC Annex.

Part 1 - Introduction

CC-100 Purpose and Application.

This Appendix CC describes the Army Contracting Enterprise (ACE) risk management strategy and provides procedures to be used within the Army to establish and manage Army internal control assessments conducted via the Procurement Management Review (PMR) Program. The content in this appendix is consistent with the processes described in Office of Management and Budget (OMB) Circular A-123, Management's Responsibility for Enterprise Risk Management (ERM) and Internal Control, and Army Regulation (AR) 11-2, Managers Internal Control Program (MICP). The functions covered in this appendix are applicable to all FAR-based and non-FAR-based Army acquisition functions. Specific guidance relating to the method and frequency of assessment for the Government-wide Purchase Card (GPC), Army Small Business Program, Other Transactions (OTs), and financial assistance (i.e., Grants/Cooperative Agreements) functions are located in the applicable policy documents for those functions.

CC-101 Definitions.

As used in this appendix—

"Best practice" means an innovative, novel, or otherwise noteworthy approach or practice used to comply with one or more internal controls.

"Contingency contracting" means a military operation that is designated by the Secretary of Defense as an operation in which members of the armed forces are or may become involved in military actions, operations, or hostilities against an enemy of the United States or against an opposing military force in accordance with 10 USC 101(a)(13)(A) (see also FAR subpart 2.1). The support may be provided in a mature or immature operational environment and may be long term or short term.

"Internal controls" (also known as "internal management controls") means the rules, procedures, techniques, and devices employed by managers to ensure that what should occur in their daily operations does occur on a continuing basis. For the purposes of this appendix, internal controls include the policies in the FAR, DFARS, and AFARS, and the associated processes and procedures of the contracting activity's acquisition instruction (see AFARS 5101.304-90).

"Key internal controls" are those internal controls that must be implemented and sustained in daily operations to ensure organizational effectiveness and compliance with legal requirements. The effectiveness of key internal controls is assessed through the PMR Program and other management review processes.

"Lesson learned" means a noteworthy flaw in the design, implementation, or operational effectiveness of one or more internal controls.

"Strategic controls" are those controls that are directly linked to ACE contracting strategic objectives. The primary focus of strategic controls is on operations (i.e., cost, schedule, and performance) objectives.

CC-102 Army Contracting Enterprise Strategic Objectives.

In accordance with FAR 1.102(b), the ACE defines its operations, reporting, and compliance strategic objectives for contracting as follows:

- (1) Operations objectives.
 - a. Satisfy the customer in terms of cost;
 - b. Satisfy the customer in terms of quality; and
 - c. Satisfy the customer in terms of timeliness.
- (2) Reporting objective. Conduct business with openness.
- (3) Compliance objectives.
 - a. Minimize administrative operating costs;
 - b. Conduct business with integrity and fairness; and
 - c. Fulfill public policy objectives

CC-103 ACE Contracting Risk Management.

The ACE views internal control as a critical element for managing risk. The ACE manages risk to its strategic objectives and assesses the effectiveness of its internal controls, using Procurement Management Reviews, Peer Reviews, Independent Management Reviews, audits, training, self-assessments, and other management control activities. The use and periodic evaluation of key internal controls is an integral component of an organization's management that provides reasonable assurance of the effectiveness and efficiency of the organization. Risk is defined as the effect of uncertainty on objectives. Risk management is a series of coordinated activities to direct and control challenges or threats to achieving an organization's goals and objectives. Risk management on an enterprise-wide basis is an effective agency-wide approach to addressing the full spectrum of the organization's external and internal risks by understanding the combined impact of risks across the organization, rather than addressing risks only within a single component of the organization. While agencies cannot respond to all risks related to achieving strategic objectives and performance goals, they must identify, measure, and assess risks related to mission execution. ACE risk management reflects forward-looking management decisions and balancing risks and returns so the ACE enhances its value to the taxpayer and increases its ability to achieve its strategic objectives.

CC-104 ACE Contracting Risk Tolerance.

Risk tolerance is the acceptable level of variance in performance relative to the achievement of objectives. The ACE will tolerate a greater level of variance in performance in achieving reporting and compliance strategic objectives relative to the achievement of operations strategic objectives. However, variation in achievement of the non-operations strategic objectives is not tolerated when it negatively impacts the achievement of operations strategic objectives. This strategic guidance is

intended to promote initiative and sound business judgment by the Acquisition Team in providing the best value product or service to meet the customer's needs.

CC-105 ACE Contracting Risk Profile.

The primary purpose of a risk profile is to provide a thoughtful analysis of the risks an organization faces toward achieving its strategic objectives arising from its activities and operations, and to identify appropriate options for addressing significant risks. It is a prioritized inventory of the most significant risks, from a portfolio perspective, identified and assessed through the risk assessment process versus a complete inventory of risks. The ACE, as the Army body empowered and responsible for the exercise of procurement authority, maintains a risk profile for Army contracting.

Part 2 - PMR Program Philosophy and Policy

CC-200 Philosophy.

The PMR Program is a crucial element of ACE contracting governance. Specifically, the PMR Program assesses the effectiveness of strategic controls, internal controls, and key internal controls to mitigate risks to the ACE contracting strategic objectives.

CC-201 Policy.

(a) The Army PMR Program will assess the effectiveness of internal controls at both the contracting activity level and on a strategic, enterprise-wide basis.

(b) The Office of the Deputy Assistant Secretary of the Army (Procurement) (ODASA(P)) is responsible for evaluating the effectiveness of strategic controls. Questions for strategic controls are designed to be qualitative in nature and to facilitate the identification of best practices and lessons learned. The ODASA(P) will conduct such assessments via ODASA(P)-led PMRs or will leverage other strategic management review processes. The effectiveness of strategic controls will be assessed via ODASA(P)-led strategic management reviews (Type 4 assessment) and the effectiveness of internal/key controls will be assessed, as required, by the ODASA(P), using Special Assistance Reviews or Assessments (Type 3 assessment). The Strategic Control Question Set is an Annex to this appendix. The ODASA(P) may also leverage other question sets, as required, for strategic management reviews.

(c) In addition to any command-authority internal control duties, each Head of Contracting Activity (HCA) is responsible for executing the procurement authority aspects of the contracting activity's MICP (see AR 11-2). Specifically, HCAs and Senior Contracting Officials (SCOs) shall assess the effectiveness of key internal controls (Type 2 assessment) and shall provide the results annually as part of the Summary Health Report (SHR). The Internal Control Question Set is located in the Virtual Contracting Enterprise (VCE)- PMR Assistant Module. All other PMR Question Sets and Toolkits are located on the PMR SharePoint page at Procurement.Army.Mil.

(d) The PMR Program will identify elevated risks to the achievement of contracting strategic objectives and compliance with acquisition policies and procurement regulations. The key internal

controls, strategic control assessments, and other PMR Program outputs will be used to identify improvements to contracting operations.

Part 3 - PMR Responsibilities

CC-300 Assistant Secretary of the Army (Acquisition, Logistics and Technology) (ASA(ALT)).

The ASA(ALT) is the Army Acquisition Executive (AAE) and the Senior Procurement Executive (SPE) and is responsible for all procurement and contracting functions across the Department of the Army (DA), to include but not limited to providing oversight of contracting functions through an enterprise-wide PMR Program.

CC-301 Deputy Assistant Secretary of the Army for Procurement (DASA(P)).

The DASA(P) is the DA proponent for the PMR Program supporting the SPE to provide oversight and evaluation of Army contracting, consistent with the enterprise risk management and internal control practices of OMB Circular A-123 and AR 11-2.

CC-302 Heads of Contracting Activities.

HCA's shall -

- (a) Assess the effectiveness of procurement-authority key internal controls, consistent with the policies and objectives of this appendix; review contracting compliance with FAR, DFARS, AFARS, DA Policy, and Command Supplements, consistent with DA PMR objectives and DASA(P) special interest areas.
- (b) Designate representatives from their staff to interface with ODASA(P) to support the successful execution of the policies of this appendix
 - (1) Appoint, in writing, a primary and alternate representative to the PMR Advisory Board (AB).
 - (2) Delegable no lower than the designated PMR AB member, appoint, in writing, a primary and alternate representative to the PMR Configuration management Board (CMB).
 - (3) Designated representatives cannot simultaneously hold the position of PMR AB member and CMB member.
- (c) Provide supplemental staff support, as required, to conduct ODASA(P)-led assessments of strategic controls and ODASA(P)-directed special interest reviews;
- (d) Identify and communicate best practices and lessons learned, gathered from management control activities, in the contracting activity's annual SHR.

Part 4 - Procedures

CC-400 Scheduling.

(a) At a minimum, HCAs or their SCOs will -

(1) Conduct PMRs on contracting activities, to include subordinate contracting offices, regardless of the level, at least once every three years (36 months)

(2) Provide the schedule of reviews no later than 31 August of the preceding fiscal year to the ODASA(P) Procurement Insight/ Oversight (PI/O) Directorate.

(b) Waivers.

(1) The DASA(P) may grant, in writing, a 12-month extension, to the 36-month time frame, on a one-time basis, when circumstances are justified.

(2) Waiver requests shall be submitted with the annual PMR schedule of reviews.

(c) The DASA(P) may require, in writing, more frequent reviews of contracting activities as deemed necessary.

CC-401 Types of Procurement Management Reviews.

(a) The PMR is a tiered program that includes the following types of assessments:

(1) Type 1: Reviews of Internal Controls (other than key internal controls) conducted by the Contracting Activity (CA) Management, as needed, using assessment methods in accordance with Command, CA, local or other applicable guidance.

(2) Type 2: Reviews of Key Internal Controls conducted by the HCAs and SCOs to Offices of the Directors of Contracting and other subordinate contracting offices, at least once every three years (36 months), using the Internal Control Question Set, and any supplemental question sets or toolkits.

(3) Type 3: Reviews of Internal/Key Internal Controls, conducted by the ODASA(P), as needed for special assistance reviews and assessments, on selected CAs and/or ACE-wide, using the applicable question set(s).

(4) Type 4: Reviews of Strategic Controls conducted by the ODASA(P), annually, using the Strategic Control Question Set for CAs across the ACE.

(b) Contingency Contracting.

(1) The Contracting Support Brigades (CSBs), within the Army Contracting Command, execute theater support contracting actions in support of deployed Army forces, and commands and coordinates other common contracting actions as directed by the supported commander. The HCA is responsible for the authority, including contracting policy, compliance, and oversight of all deployed Army theater support contracting missions.

(2) In conjunction with any PMR performed on a CSB with contingency contracting efforts/missions,

the HCA shall utilize the Contingency Contracting Question Set, located on the PMR SharePoint page at Procurement.Army.Mil to assess the key internal controls of their contingency contracting operations.

(c) Top-level information on review responsibility, method of assessment, frequency of assessment, and assessment instructions is provided in the table below.

Type	Control Type	Primary Responsibility for Control Assessment	Method of Assessment	Frequency of Control Assessment	Assessment Instructions
1	Internal Controls (Other than Key Controls)	CA Management	Business clearance, legal review, local policy and compliance reviews and self-assessments	Action-by-Action IAW CA	CA
		HCA, SCOs	Internal Control Question Set Contingency Contracting Question Set (as applicable)	At least once every three years (36 months)	AFARS Appendix CC
		HCA	SCO Toolkit	Annually	AFARS Appendix CC
2	Key Internal Controls	Per applicable policy	GPC Toolkit	Per applicable policy	AFARS Appendix EE
		Per applicable policy	SB Toolkit	Per applicable policy	Per Army OSBP
		Per applicable policy	OT Question Set	Per applicable policy	Per ODASA(P)
		Per applicable policy	Grants/ Cooperative Agreements Question Set	Per applicable policy	Per ODASA(P)
3	Key Internal Controls	ODASA(P)	Internal Control Question Set	As required/ requested	AFARS Appendix CC

4	Strategic Controls	ODASA(P)	Strategic Controls Question Set	Annually	AFARS Appendix CC
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CC-402 Preparation for Procurement Management Reviews.

(a) For ODASA(P)-led PMRs, the ODASA(P) will notify contracting activity 90 days, or as soon as practicable, before a planned PMR. The contracting activity shall provide the following in advance: metrics, specified statistics, lists of contracts, orientation data (such as vision and mission statements and standard operating procedures), logistical support, and copies of previous review reports and previous corrective action plans. The activity may identify special areas of emphasis and assistance after being notified of a planned PMR.

(b) All other PMRs should comply with the ODASA(P) PMR Standard Operating Procedures (SOP). Commands should establish Command/local procedures to supplement the ODASA(P) PMR SOP.

CC-403 Results of Procurement Management Reviews.

(a) Reports of PMR results will contain a risk assessment, analysis of issues, commendations, observations, findings, and recommendations as appropriate. PMR report findings must be specific and include sufficient information to enable root cause analysis. PMR recommendations must be based on supported findings and be actionable.

(b) Timely PMR result reports shall be provided. At a minimum -

(1) Reviewers shall submit the initial PMR report to the reviewed activity within 30 business days of the Out-brief.

(2) The responsible official must review and approve the Corrective Action Plans (CAP) and prepare a Final PMR report within 30 business days of CAP receipt.

(c) CAPs shall be created and implemented by the contracting activity. At a minimum -

(1) The contracting activity reviewed shall submit a CAP within 30 business days of report receipt.

(2) The reviewed activity must complete corrective actions - if any - within the agreed timeframe, inform the PMR Team Lead of corrective actions taken, and request closure of the CAP.

Part 5 - ACE Annual Summary Health Report

CC-500 Purpose.

The ACE annual SHR is designed to strategically assess the ACE's collective risk management and internal control-related activities identify systemic issues, and to effectively evaluate the extent to which risks to the ACE strategic objectives have been mitigated. The goal of the process is to develop systematic evidence in order to support decision-making, understand how well policies and

programs are working, and identify or promote possible changes that improve performance.

CC-501 HCA Responsibilities.

The HCA's annual SHR is a key input to the ACE Annual SHR. HCAs shall provide to the PI/O Directorate an annual SHR for their organization, to include copies of all PMR reports and associated analyses of subordinate contracting offices, no later than 31 October, annually.

CC-502 ODASA(P) Responsibilities.

The ODASA(P) PI/O is responsible for preparing the annual ACE SHR no later than 31 January, annually. The inputs to the ACE SHR include the respective HCA's annual SHR; the results of ODASA(P)-led assessments of strategic controls, and feedback from other Headquarters DA-level and Office of the Secretary of Defense (OSD) stakeholders. The content will describe major management challenges faced by the ACE, assess progress against ACE strategic objectives, and identify ways to improve performance.

APPENDIX CC Annex.

Evaluation of Strategic Controls

For strategic questions, the reviewer should examine the contract file documentation, and other available evidence, and mark a number (1-5) to indicate the extent to which the reviewer agrees that the standard established by the referenced internal control(s) has been met. The reviewer should explain the rationale for the selected numerical response and describe lessons learned or best practices, if any, that informed the reviewer's decision.

OPERATIONAL OBJECTIVES

Cost : Obtain best value in terms of the price/cost of the delivered product or service (FAR 1.102(b)(1)).

Question:

1. The contracting officer obtained the necessary cost or price data (but not more data than necessary) to adequately analyze the proposed price, and effectively negotiated and sufficiently documented a fair and reasonable contract price.

[Strategic Controls: FAR 15.4, DFARS 215.4, DFARS PGI 215.4, AFARS 5115.4

Suggested population: Noncompetitive negotiated actions exceeding the SAT (excluding previously peer-reviewed actions)]

_____ Strongly Agree _____ Agree _____ Neither Agree nor Disagree

(5) (4) (3)

_____ Disagree _____ Strongly Disagree

(2) (1)

To support your selected response, provide an explanation for your selection and any lessons learned or best practices.

Performance : Satisfy the customer in terms of the quality and timeliness of the delivered product or service (FAR 1.102(b)(1)).

Questions:

1. Market research was effectively conducted to arrive at the most suitable approach to acquiring, distributing, and supporting supplies and services.

[Strategic controls: FAR Part 10, DFARS Part 210, DFARS PGI 210, AFARS Part 5110

Suggested population:Contract awards exceeding the SAT (excluding previously peer-reviewed actions)]

_____ Strongly Agree _____ Agree _____ Neither Agree nor Disagree

(5) (4) (3)

_____ Disagree _____ Strongly Disagree

(2) (1)

To support your selected response, provide an explanation for your selection and any lessons learned or best practices.

2. The written Acquisition Plan or Services Acquisition Strategy adequately demonstrates that the acquisition team achieved the policy goals established in FAR 7.102 and, when required, addresses the requirements established in AFARS 5137.5 for the Acquisition of Services.

[Strategic Controls: FAR 7.102 and AFARS 5137.5

Suggested Population: Contract Awards for supplies and services with a value exceeding the threshold at DFARS 207.102(d)(i), and contract awards for services exceeding the SAT (excluding

previously peer-reviewed actions)]

_____ Strongly Agree _____ Agree _____ Neither Agree nor Disagree

(5) (4) (3)

_____ Disagree _____ Strongly Disagree

(2) (1)

To support your selected response, provide an explanation for your selection and any lessons learned or best practices.

3. The quality assurance surveillance plan (QASP) satisfies the requirements at FAR 46.401(a), considering the performance risks inherent in the specific contract type and the work effort addressed by the contract.

[Strategic Controls: FAR 46.401 and DFARS PGI 237.172

Suggested Population: Contract Awards for Services exceeding the SAT (excluding previously peer reviewed actions)]

_____ Strongly Agree _____ Agree _____ Neither Agree nor Disagree

(5) (4) (3)

_____ Disagree _____ Strongly Disagree

(2) (1)

To support your selected response, provide an explanation for your selection and any lessons learned or best practices.

4. The source selection plan effectively communicates the Government's requirements, acquisition approach, and objectives in clear, meaningful ways to encourage the best possible array of solutions to allow the acquisition team to make meaningful differentiations amongst proposals, that allow for quality and timely products and services, while ensuring the proposed cost or price is fair and reasonable and the award represents the best value to the Warfighter, the Nation, and the taxpayer.

[Strategic Control: DoD Source Selection Procedures

Suggested Population: Competitive negotiated contract awards exceeding the SAT (excluding previously peer reviewed actions)]

_____ Strongly Agree _____ Agree _____ Neither Agree nor Disagree

(5) (4) (3)

_____ Disagree _____ Strongly Disagree

(2) (1)

To support your selected response, provide an explanation for your selection and any lessons learned or best practices.

5. The contracting officer's representative (COR) utilizes the authority granted in the COR appointment letter to adequately ensure compliance with the terms of the contract or order, and the contracting officer reviews the COR files at least annually for accuracy and completeness.

[Strategic Controls: FAR 1.602-2(d), DFARS 201.602-2(d), DFARS PGI 201.602-2(d)

Suggested Population: Contracts and orders with an appointed COR (excluding contracts and orders with a previous post-award peer review (PAPR)), with at least 12 total months of contractor performance, or which are either physically complete.]

_____ Strongly Agree _____ Agree _____ Neither Agree nor Disagree

(5) (4) (3)

_____ Disagree _____ Strongly Disagree

(2) (1)

To support your selected response, provide an explanation for your selection and any lessons learned or best practices.

6. The Contractor Performance and Assessment Reporting System (CPARS) evaluation reflects how the contractor performed; includes clear, relevant information that accurately depicts the

contractor's performance, and is based on objective facts supported by program and contract or order performance data (such as COR files).

[Strategic Control: FAR 42.1503(b).

Suggested Population: Contracts and orders meeting the thresholds set forth DoD Class Deviation 2013-00018.]

_____ Strongly Agree _____ Agree _____ Neither Agree nor Disagree

(5) (4) (3)

_____ Disagree _____ Strongly Disagree

(2) (1)

To support your selected response, provide an explanation for your selection and any lessons learned or best practices.

7. For acquisitions exceeding the micro-purchase threshold but below the simplified acquisition threshold (SAT), and for commercial acquisitions conducted pursuant to the authority at FAR 13.5, the contract file demonstrates compliance with the procedures at FAR 13.1.

[Strategic Control: FAR 13.1

Suggested Population: Purchase Orders below the SAT, and commercial item purchase orders using the authority at FAR 13.5.]

_____ Strongly Agree _____ Agree _____ Neither Agree nor Disagree

(5) (4) (3)

_____ Disagree _____ Strongly Disagree

(2) (1)

To support your selected response, provide an explanation for your selection and any lessons learned or best practices.

Delivery: Satisfy the customer in terms of the timeliness of the delivered product or service (FAR 1.102(b)(1)).

Question:

1. The acquisition team demonstrates innovation, local adaptation, and sound business judgment that is consistent with law, and within the limits of its authority, to identify procedures, strategies, or practices that are not specifically addressed in the FAR system, nor prohibited by law (statute or case law), Executive Order or other regulation, but are in the best interest of the Government.

[Strategic Control: FAR 1.102-4(e)]

Suggested Population: Contracts and orders exceeding the SAT (excluding previously peer-reviewed actions)]

_____ Strongly Agree _____ Agree _____ Neither Agree nor Disagree

(5) (4) (3)

_____ Disagree _____ Strongly Disagree

(2) (1)

To support your selected response, provide an explanation for your selection and any lessons learned or best practices.

REPORTING OBJECTIVES

Openness: Conduct Business with openness (FAR 1.102(b)(3)).

Questions:

1. The procurement instrument complies with policies and procedures for assigning contract line item numbers.

[Strategic Controls: FAR 4.10, DFARS 204.71, and DFARS PGI 204.71

Suggested Population: The instruments and documentation described at FAR 4.1002 and DFARS 204.7102]

_____ Strongly Agree _____ Agree _____ Neither Agree nor Disagree

(5) (4) (3)

_____ Disagree _____ Strongly Disagree

(2) (1)

To support your selected response, provide an explanation for your selection and any lessons learned or best practices.

2. The acquisition complies with the uniform reporting requirements for the Federal Procurement Data System (FPDS).

[Strategic Controls: FAR 4.6, DFARS 204.6, DFARS PGI 204.6

Suggested Population: Actions described at FAR 4.606(a)]

_____ Strongly Agree _____ Agree _____ Neither Agree nor Disagree

(5) (4) (3)

_____ Disagree _____ Strongly Disagree

(2) (1)

To support your selected response, provide an explanation for your selection and any lessons learned or best practices.

COMPLIANCE OBJECTIVES

Fairness and Integrity: Conduct business with fairness and integrity (FAR 1.102(b)(3)).

Questions:

1. The task-order and delivery-order ombudsman reviews complaints from contractors and ensures they are afforded a fair opportunity to be considered, consistent with the procedures in the contract.

[Strategic Control: FAR 16.505(b)(8)]

Suggested Population: Multiple-Award task-order and delivery-order contracts]

_____ Strongly Agree _____ Agree _____ Neither Agree nor Disagree

(5) (4) (3)

_____ Disagree _____ Strongly Disagree

(2) (1)

To support your selected response, provide an explanation for your selection and any lessons learned or best practices.

2. Potential organizational conflicts of interest (OCI) are identified and evaluated as early in the acquisition process as possible and significant conflicts are avoided, neutralized, or mitigated before contract award.

[Strategic Controls: FAR 9.504

Suggested Population: Negotiated contracts greater than the SAT involving situations described at FAR 9.505-1 to 9.505-4]

_____ Strongly Agree _____ Agree _____ Neither Agree nor Disagree

(5) (4) (3)

_____ Disagree _____ Strongly Disagree

(2) (1)

To support your selected response, provide an explanation for your selection and any lessons learned or best practices.

Operating Costs: Minimize administrative operating costs (FAR 1.102(b)(2)).

Question:

1. The documentation describing the basis of the decision to provide Government property to the contractor adequately addresses each of the requirements of FAR 45.102.

[Strategic Controls: FAR 45.102, DFARS PGI 245.103-70

Suggested Population: Contracts when Government property is furnished to contractors, except when contractors are furnished property for repair, modification, or overhaul under a contract.]

_____ Strongly Agree _____ Agree _____ Neither Agree nor Disagree

(5) (4) (3)

_____ Disagree _____ Strongly Disagree

(2) (1)

To support your selected response, provide an explanation for your selection and any lessons learned or best practices.

Public Policy: Fulfill Public Policy Objectives (FAR 1.102(b)(4))

Questions:

1. The written determination that consolidation is necessary and justified sufficiently addresses the elements at FAR 7.107-2.

[Strategic Controls: FAR 7.107-2, AFARS 5107.107-2

Suggested Population: Contracts which contain consolidated requirements valued between \$2 million and \$500 million]

_____ Strongly Agree _____ Agree _____ Neither Agree nor Disagree

(5) (4) (3)

_____ Disagree _____ Strongly Disagree

(2) (1)

To support your selected response, provide an explanation for your selection and any lessons learned or best practices.

2. The contracting officer adequately evaluates the prime contractor's compliance with its individual subcontracting plan, including assessing whether the prime contractor made a good faith effort to comply with its individual small business subcontracting plan.

[Strategic Control: FAR 19.705-6(g)(1)

Suggested Population: Contracts with individual subcontracting plans]

_____ Strongly Agree _____ Agree _____ Neither Agree nor Disagree

(5) (4) (3)

_____ Disagree _____ Strongly Disagree

(2) (1)

To support your selected response, provide an explanation for your selection and any lessons learned or best practices.
