



September 2019

# DEFENSE WORKFORCE

## Steps Needed to Identify Acquisition Training Needs for Non-Acquisition Personnel

This report was revised on October 2, 2019 to correct two numbers that had been transposed in the Highlights page figure.

# GAO Highlights

Highlights of [GAO-19-556](#), a report to congressional committees

## Why GAO Did This Study

DOD spends hundreds of billions of dollars annually acquiring products and services. Since 1990, Congress and DOD have taken numerous steps to address issues related to the quality of DOD's acquisition workforce, which consists of contracting officers, cost estimators, and personnel in several other career fields. But tens of thousands of others, referred to as non-acquisition personnel, also affect how DOD acquires products and services such as major weapon systems and logistics support. These personnel have a wide range of primary responsibilities, such as piloting aircraft and managing facilities, and they are sometimes directed to perform acquisition-related functions, such as overseeing contracts.

The National Defense Authorization Act for Fiscal Year 2018 included a provision for GAO to review steps DOD has taken to ensure non-acquisition personnel receive appropriate acquisition-related training. This report addresses the extent to which DOD can identify (1) non-acquisition personnel supporting acquisitions, and (2) their need for acquisition training. GAO analyzed training data; reviewed policies, guidance, and memorandums; and interviewed personnel from the Office of the Secretary of Defense and the military departments.

## What GAO Recommends

GAO recommends that DOD: (1) designate an official responsible for identifying non-acquisition personnel contributing to services acquisitions, and (2) ensure components provide DAU comprehensive information about non-acquisition personnel training needs. DOD concurred with the recommendations.

View [GAO-19-556](#). For more information, contact Timothy J. DiNapoli at (202) 512-4841 or [DiNapoliT@gao.gov](mailto:DiNapoliT@gao.gov).

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# DEFENSE WORKFORCE

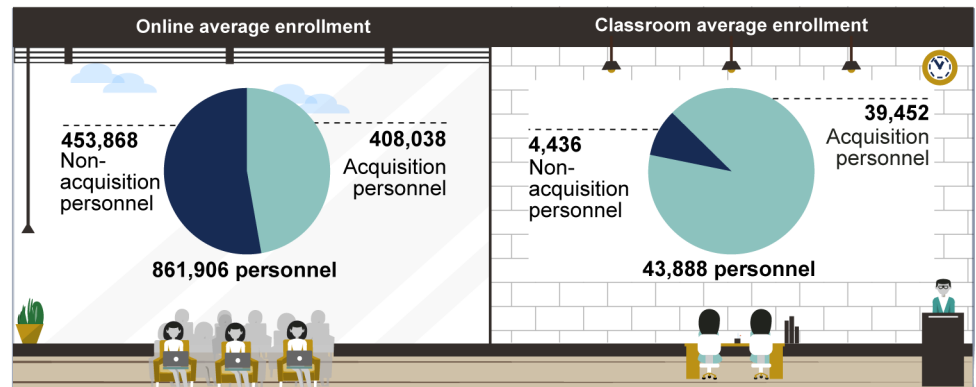
## Steps Needed to Identify Acquisition Training Needs for Non-Acquisition Personnel

### What GAO Found

The Department of Defense (DOD) has implemented two of three key initiatives to identify non-acquisition personnel supporting acquisitions. DOD has implemented initiatives to identify non-acquisition personnel who (1) develop requirements, and (2) oversee contracts. However, DOD has not implemented a third initiative to identify non-acquisition personnel contributing to services acquisitions more generally. In fiscal year 2018, DOD obligated \$175 billion for contracts for services such as management support and information technology. In April 2016, the DOD Acquisition Executive (DAE) directed a team comprised of representatives from the Office of the Secretary of Defense, the Air Force, and the Defense Acquisition University (DAU) to develop a schedule for identifying these personnel by October 2016. However, the team did not complete this task by March 2019, when the current DAE directed the team to focus on other issues, and the DAE has not yet determined who will be responsible for completing this task. As a result, DOD has not established how and when it will identify non-acquisition personnel contributing to services acquisitions, or what policy updates and resources may be necessary to identify them.

DOD does not comprehensively identify non-acquisition personnel's need for acquisition-related training. As a result, the department cannot determine the extent to which it is meeting their needs. All non-acquisition personnel have access to DAU's online training, but many of DAU's more advanced courses are only provided in a classroom setting. DAU prioritizes training acquisition personnel—its primary mission—when delivering the resource-constrained classroom training (see figure).

Average Annual Enrollment in Defense Acquisition University Courses, Fiscal Years 2016 through 2018



Source: GAO analysis of DAU data for fiscal years 2016 through 2018. | [GAO-19-556](#)

DOD policy requires that DOD components provide DAU information about the training needs of non-acquisition personnel as part of the annual budgeting process. However, GAO found that the components only provide DAU this information for acquisition personnel and requirements developers. Without comprehensive information about non-acquisition personnel's acquisition-training needs, DOD cannot determine the extent to which it is meeting those needs.

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## Abbreviations

CAE	Component Acquisition Executive
CAR	Component Appointed Representative
COR	Contracting Officer's Representative
CORT Tool	Contracting Officer Representative Tracking Tool
DACM	Director, Acquisition Career Management
DAU	Defense Acquisition University
DAWDF	Defense Acquisition Workforce Development Fund
DAWIA	Defense Acquisition Workforce Improvement Act
DOD	Department of Defense
DPAP	Defense Procurement and Acquisition Policy
DPC	Defense Pricing and Contracting
FAR	Federal Acquisition Regulation
FIPT	Functional Integrated Product Team
HCI	Human Capital Initiatives
JROC	Joint Requirements Oversight Council
OSD	Office of the Secretary of Defense
USD (A&S)	Under Secretary of Defense for Acquisition and Sustainment
USD (AT&L)	Under Secretary of Defense for Acquisition, Technology and Logistics

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September 5, 2019

### Congressional Committees

The Department of Defense (DOD) spends hundreds of billions of dollars annually acquiring products and services. DOD's acquisition workforce enables the department to buy major weapon systems like the Joint Strike Fighter, commercially available items including laptop and desktop computers, and support for military bases in the form of maintenance and food services, among other things. In 1990, Congress enacted the Defense Acquisition Workforce Improvement Act (DAWIA) to formally define DOD's acquisition workforce and standardize education, experience, and training requirements.<sup>1</sup> Since that time, Congress and DOD have taken numerous steps to address issues related to acquisition workforce quality at DOD. However, tens of thousands of DOD personnel who are not designated as members of DOD's acquisition workforce also affect how well DOD acquires products and services. These non-acquisition personnel have a wide range of primary responsibilities that are not considered acquisition functions, such as piloting aircraft or managing facilities. Under certain circumstances, these personnel may perform acquisition-related functions, such as developing requirements, performing market research, or providing contractor oversight.

Section 843(d) of the National Defense Authorization Act for Fiscal Year 2018 included a provision for us to, among other things, review steps DOD has taken to ensure non-acquisition personnel receive appropriate acquisition-related training. This report examines the extent to which DOD has identified: (1) non-acquisition personnel supporting acquisitions; and (2) non-acquisition personnel's acquisition training needs.

To assess the extent to which DOD has identified non-acquisition personnel supporting acquisitions, we reviewed three key DOD initiatives intended to identify non-acquisition personnel: (1) developing requirements for defense acquisition programs; (2) overseeing contracts for products and services; and (3) contributing to services acquisitions more generally. We also reviewed DOD efforts to identify non-acquisition personnel performing market research and supporting source selections,

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<sup>1</sup>See Defense Acquisition Workforce Improvement Act, Pub. L. No. 101-510, § 1201-1211 (Nov. 5, 1990) (relevant sections codified as amended at 10 U.S.C. § 1701-1764).

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two important acquisition-related functions. To understand requirements for DOD to identify such personnel, we reviewed relevant statutes, federal and defense acquisition regulations, and DOD instructions and policies. To understand DOD's processes for identifying these personnel, we reviewed memorandums from acquisition leaders, charters from teams responsible for identifying requirements developers and non-acquisition personnel contributing to services acquisitions, the user guide for a system that tracks non-acquisition personnel overseeing contracts—DOD's Contracting Officer's Representative Tracking (CORT) tool—and other key documents. We also reviewed personnel documentation identifying non-acquisition personnel with requirements development or contract oversight responsibilities. To supplement this documentation, we interviewed officials responsible for identifying requirements developers at the military departments and the Defense Acquisition University (DAU), representatives from the Office of Defense Pricing and Contracting (DPC) responsible for implementing the CORT tool, and DPC and Air Force officials responsible for identifying non-acquisition personnel contributing to services acquisitions. Additionally, we interviewed DOD acquisition personnel and DAU officials to understand how DOD approaches non-acquisition personnel conducting market research and supporting source selections.

To assess the extent to which DOD has identified non-acquisition personnel's acquisition-related training needs, we interviewed OSD and military department officials responsible for acquisition training. These individuals included DAU's Director for Performance and Resource Management and its learning directors for services acquisitions and contracting, and each of the military department's Directors for Acquisition Career Management or their representatives. Through our discussions with military department officials, we determined that the military departments do not centrally manage the acquisition-related training for non-acquisition personnel. As a result, we focused on the training provided by DAU based on its established role in DOD policy.<sup>2</sup> To understand DAU's responsibilities for training non-acquisition personnel, we interviewed DAU officials responsible for developing DAU's curriculum and training schedule, and reviewed DOD Instructions and DAU's operating policies, including its policy for enrolling students. To supplement this documentation, at each military department, we

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<sup>2</sup>See DOD Instruction (DODI) 5000.57, *Defense Acquisition University (DAU)* (Incorporating Change 2, Aug. 31, 2018).

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interviewed senior acquisition officials responsible for enrolling their respective personnel in DAU courses to understand how they coordinate with DAU. We also reviewed DAU training data from fiscal years 2016 through 2018 to determine the amount of training DAU provided, how DAU delivered that training—online versus classroom courses—and the number of non-acquisition personnel who received training. To determine whether the data were reliable for reporting the number of non-acquisition personnel enrolled in DAU training, we interviewed the DAU official responsible for maintaining DAU’s enrollment data, and reviewed pertinent documents such as DAU’s guidance for building the academic schedule to understand the processes and procedures for student enrollment. We found these data to be reliable for reporting the number of non-acquisition personnel enrolled in DAU training. Additionally, we reviewed DAU’s curriculum and identified courses related to requirements development, market research, source selection, and contract oversight.<sup>3</sup> See appendix I for more information about our scope and methodology.

We conducted this performance audit from July 2018 to September 2019 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## Background

In 1990, Congress passed DAWIA, which, among other things, directed DOD to establish education, training, and experience requirements for the acquisition workforce.<sup>4</sup> In response to this direction, DOD established various acquisition career fields, such as cost estimating and contracting with associated minimum requirement standards. As of March 2019, DOD reported that approximately 175,000 of its roughly 3 million personnel were formally designated members of the acquisition workforce. DOD considers the remaining 2.8 million personnel—which consist of approximately 2.1 million military personnel and 700,000 civilian personnel—non-acquisition personnel. Under certain circumstances, these personnel can perform acquisition-related functions.

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<sup>3</sup>Appendix II provides a list of DAU courses that address the functions that we reviewed in this report.

<sup>4</sup>See Pub. L. No. 101-510, § 1201-1211.



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DOD acquisition personnel often work closely with non-acquisition personnel when acquiring products and services, and these non-acquisition personnel can have a significant impact on the outcome of these acquisitions. In general, non-acquisition personnel are at least partly responsible for the following functions:

- **Defining requirements:** Identifying what end users need to conduct their missions, and communicating these needs in a manner that allows the government to solicit proposals from prospective contractors.
- **Conducting market research:** Collecting and analyzing data about capabilities in the market that could meet acquisition requirements.
- **Participating in source selection:** Helping acquisition personnel evaluate prospective contractors' proposals when DOD plans to competitively award a contract.
- **Overseeing contract performance:** Verifying that the contractor is fulfilling delivery and quality parameters in accordance with the contract, and documenting accordingly. Acquisition regulations establish that the cognizant contracting officers—members of the acquisition workforce—are generally responsible for overseeing contract execution unless they formally designate in writing individuals to serve as their Contracting Officers' Representatives (COR), who can be non-acquisition personnel.<sup>5</sup>

The Federal Acquisition Regulation, however, specifies that certain functions can only be performed by acquisition personnel, specifically a warranted contracting officer. For example, only contracting officers can conduct negotiations.<sup>6</sup> Non-acquisition personnel cannot assume responsibility for this function.

In addition to specific functions, we have previously found that non-acquisition personnel play a particularly large role in services acquisitions more generally, constituting more than half of the individuals who contributed to contracts we reviewed in 2011.<sup>7</sup> The significance of

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<sup>5</sup>See FAR § 1.602-2(d).

<sup>6</sup>See FAR § 15.306(d).

<sup>7</sup>GAO, *Defense Acquisition Workforce: Better Identification, Development, and Oversight Needed for Personnel Involved in Acquiring Services*, [GAO-11-892](#) (Washington, D.C.: Sept. 28, 2011).

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services acquisitions for DOD is underscored by the fact that DOD is the federal government's largest purchaser of contractor-provided services, obligating \$175 billion for services contracts in fiscal year 2018. Further, from fiscal years 2014 through 2018, about half of DOD's contract obligations were for services. Moreover, we have identified DOD services acquisitions as an element underlying our designation of DOD contract management as a high-risk area.<sup>8</sup>

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## DOD Acquisition Leaders' Training Responsibilities

DOD's acquisition leaders generally manage the acquisition-related training resources that may be accessed by non-acquisition personnel. For example, in 1990, DAWIA assigned the Under Secretary of Defense for Acquisition responsibility for recommending funding levels needed to implement acquisition training programs.<sup>9</sup> This responsibility was transferred to the DOD Acquisition Executive positions that succeeded the Under Secretary of Defense for Acquisition, including the Under Secretary of the Defense for Acquisition, Technology and Logistics (USD (AT&L)). As of June 2019, the responsibility resides with the Under Secretary of Defense for Acquisition and Sustainment (USD (A&S)). USD (A&S) is also responsible for designating functional leaders to oversee different aspects of DOD acquisitions, such as requirements development.<sup>10</sup> DOD policy also identified certain officials to help meet the acquisition-training responsibilities of USD (A&S) (see table 1).<sup>11</sup>

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<sup>8</sup>GAO, *High-Risk Series: Substantial Efforts Needed to Achieve Greater Progress on High-Risk Areas*, [GAO-19-157SP](#) (Washington, D.C.: Mar. 6, 2019).

<sup>9</sup>See Pub. L. No. 101-510, § 1202 (codified as amended at 10 U.S.C. § 1741).

<sup>10</sup>See DODI 5000.66, *Defense Acquisition Workforce Education, Training, Experience, and Career Development Program* (July 27, 2017). See also National Defense Authorization Act for Fiscal Year 2017, Pub. L. No. 114-328, § 901 (Dec. 23, 2016) (codified as amended at 10 U.S.C. § 133b).

<sup>11</sup>See DODI 5000.57; DODI 5000.66.

**Table 1: Select Department of Defense (DOD) Officials’ Training Responsibilities**

DOD Official	Training responsibilities
Under Secretary of Defense for Acquisition and Sustainment (USD (A&S))	<ul style="list-style-type: none"> <li>Establishes training program requirements for acquisition-related functions, such as requirements development and contract oversight.</li> <li>Recommends to the Secretary of Defense funding levels needed to implement acquisition training programs.</li> <li>Designates functional leaders to provide senior oversight for their respective areas, including requirements development and services acquisitions.</li> </ul>
President, Defense Acquisition University (DAU)	<ul style="list-style-type: none"> <li>Serves as the Chief Learning Officer for DOD’s acquisition community by developing and delivering training that addresses the competencies identified by the functional leaders.</li> <li>Organizes, manages, and directs DAU and all of its assigned resources.</li> <li>Provides career-long learning support through certification courses, job performance training, knowledge sharing, continuous learning, and other activities as directed by the USD (A&amp;S).</li> </ul>
Functional Leaders	<ul style="list-style-type: none"> <li>Serve as the subject matter experts for their respective areas, such as requirements development and services acquisitions.</li> <li>Establish and oversee the training standards for their career fields.</li> <li>Annually certify that DAU course content is current, accurate, and consistent with DOD policy.</li> <li>Charter and chair Functional Integrated Product Teams to help meet Functional Leader responsibilities and to facilitate collaboration among stakeholders.</li> </ul>
Component Acquisition Executives (CAE)	<ul style="list-style-type: none"> <li>Acting on behalf of DOD component heads—the most senior leaders at the military departments, defense agencies, and other DOD organizational entities—CAEs provide annual training and budgetary requirements for acquisition and non-acquisition personnel to DAU.</li> </ul>
Directors, Acquisition Career Management	<ul style="list-style-type: none"> <li>Principal advisors to their respective components on all matters pertaining to acquisition workforce education, training, and career development.</li> <li>Manage their respective components’ registration for DAU training.</li> <li>Manage their respective components’ Defense Acquisition Workforce Development Funds.</li> </ul>

Source: GAO analysis of applicable laws and DOD policies. | GAO-19-556

## Defense Acquisition University

DAWIA also directed the Secretary of Defense to establish a DAU to provide for (1) the professional educational development and training of the acquisition workforce; and (2) research and analysis of defense acquisition policy issues from an academic perspective.<sup>12</sup> In implementing this aspect of DAWIA, DOD established that DAU is responsible for providing the training necessary to develop qualified DOD acquisition personnel.<sup>13</sup> DAU delivers this training through traditional classroom-based courses, online training modules, and acquisition workshops where instructors develop and deliver customized training to support a particular acquisition. Additionally, DAU provides a variety of tools and resources to

<sup>12</sup>See Pub. L. No. 101-510, § 1202 (codified as amended at 10 U.S.C. § 1746).

<sup>13</sup>See DODI 5000.57.

assist personnel performing acquisition-related functions, including the Acquisition Requirements Roadmap Tool, the Defense Acquisition Guidebook, and the Service Acquisition Mall.

For fiscal year 2018, DAU reported it employed approximately 600 faculty and staff to execute its mission. According to the DAU Director for Performance and Resource Management, these personnel positions are exclusively funded with DAU’s Operations and Maintenance funds. DAU also receives funding from the Defense Acquisition Workforce Development Fund (DAWDF) to develop course materials and facilitate faculty travel.<sup>14</sup> However, DAU officials stated that they do not apportion those funds to specific courses. Table 2 presents DAU’s funding from fiscal years 2016 through 2018.

**Table 2: Defense Acquisition University (DAU) Funding Sources, Fiscal Years 2016 through 2018**

Fiscal Year	Operations and Maintenance funds	Defense Acquisition Workforce Development Fund	Total funding by year
2016	\$137 million	\$79 million	<b>\$216 million</b>
2017	\$138 million	\$63 million	<b>\$201 million</b>
2018	\$140 million	\$80 million	<b>\$220 million</b>

Source: GAO analysis of DOD information. | GAO-19-556

Note: All figures are rounded to the nearest million.

## DOD Has Identified Many Non-Acquisition Personnel Performing Acquisition-Related Functions, but Progress Lags in Services Acquisitions

DOD has implemented two of three key initiatives to identify non-acquisition personnel supporting acquisitions, but has not yet completed steps needed to implement the third, which is focused on identifying non-acquisition personnel contributing to services acquisitions. Over the past several years, DOD has established processes and systems to identify non-acquisition personnel who perform two important acquisition-related functions—requirements development and contract oversight. As of October 2018, DOD had identified approximately 4,000 requirements development positions for defense acquisition programs, and approximately 90,000 individuals serving as CORs for various types of product and service acquisitions. DOD’s efforts to identify non-acquisition personnel supporting services acquisitions have been unsuccessful. In April 2016, the USD (AT&L) directed a team comprised of representatives

<sup>14</sup>DAWDF funds may also be used to pay for students to travel to DAU for classroom instruction.

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from OSD, the Air Force, and DAU to develop a schedule for identifying these personnel by October 2016. However, the team did not complete this task by March 2019 when the USD (A&S) directed the team to focus on other issues. The USD (A&S) has not yet reassigned responsibility for these tasks, but the need remains, as DOD still has not established how and when it will identify non-acquisition personnel contributing to services acquisitions. DOD does not have efforts underway to identify non-acquisition personnel who help perform important market research and source selection functions. OSD officials stated that the administrative costs necessary to identify them would exceed the associated benefits.

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### DOD Has Made Significant Progress Identifying Non-Acquisition Personnel Who Develop Requirements for Major Acquisition Programs

Each military department has identified the non-acquisition civilian and military positions within their respective organizations that are responsible for developing requirements for their defense acquisition programs. The Joint Requirements Oversight Council (JROC) is generally responsible for reviewing DOD's joint requirements development process, and JROC leadership has worked with DAU leadership and USD (A&S)—and prior to that USD (AT&L)—to identify requirements development positions across DOD.<sup>15</sup> The JROC's efforts were largely in response to the National Defense Authorization Act for Fiscal Year 2007, which directed USD (AT&L), in consultation with DAU, to establish a training program to certify civilian and military personnel who develop requirements for major defense acquisition programs.<sup>16</sup>

DOD established five DAU requirements development courses. Non-acquisition personnel are required to complete some or all of the courses, depending on their level of responsibility in the requirements development process. Our review of DAU's training curriculum found that the courses address topics such as analyzing users' needs, coordinating across organizations, and creating and validating requirements documents.

To identify personnel who should be enrolled in the training program, in 2012, the JROC directed each of the services, combatant commands, and other DOD components to establish a Component Appointed

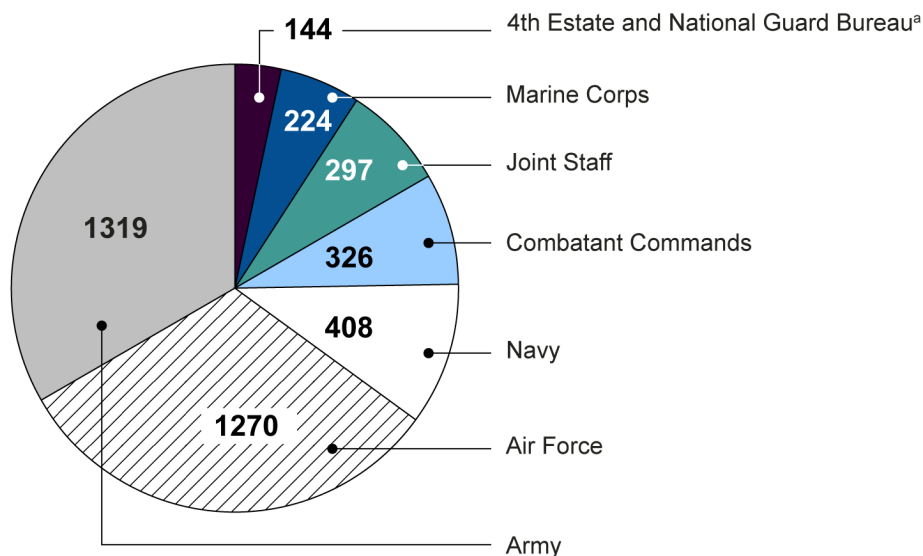
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<sup>15</sup>See Joint Staff CJCSI 5123.01H, *Charter of the Joint Requirements Oversight Council (JROC) and Implementation of the Joint Capabilities Integration and Development System (JCIDS)* (Aug. 31, 2018); 10 U.S.C. § 181.

<sup>16</sup>See John Warner National Defense Authorization Act for Fiscal Year 2007, Pub. L. No. 109-364, § 801 (Oct. 17, 2006). See also 10 U.S.C. § 2430(a) (defining major defense acquisition programs).

Representative (CAR) for the requirements development positions.<sup>17</sup> These CARs are responsible for identifying all of the civilian and military positions in their respective departments that would need certification to develop requirements for defense acquisition programs. The CARs are also responsible for providing the Joint Staff periodic updates on these positions. As of October 2018, the CARs had identified approximately 4,000 civilian and military requirements development positions across DOD (see figure 1).

**Figure 1: Requirements Development Positions Identified by Component Appointed Representatives**



Source: GAO analysis of Defense Acquisition University information. | GAO-19-556

<sup>8</sup>4th Estate is generally comprised of defense agencies and field activities outside the military departments.

Each of the military departments has also established personnel codes to identify and track military non-acquisition personnel supporting requirements development by name once they have completed the required training. To do so, the military departments apply specific codes to individuals' electronic personnel files that identify the individual's past

<sup>17</sup>See DOD, *Manual for the Operation of the Joint Capabilities Integration and Development System* (Jan. 19, 2012). DOD's combatant commands provide command and control of military forces with specific geographic or functional missions, for example the Africa Command and the Transportation Command.

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training and experience, including whether they have previously served in a requirements development position. Military department officials told us it is particularly important to identify military personnel in this manner because these personnel come from and regularly return to their primary military occupations, whereas civilian non-acquisition personnel often remain in their requirements development positions for longer periods of time. For example, Navy requirements personnel told us that members of their community often serve as naval aviators or surface warfare officers before becoming requirements developers, and that many of these individuals return to those positions after a 2-year period.

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### DOD Has Made Significant Progress Identifying Non-Acquisition Personnel Overseeing Contract Execution

DOD has also made progress in identifying non-acquisition personnel who perform contract oversight responsibilities. We found that Defense Pricing and Contracting (DPC)—the office responsible for this effort—identified approximately 90,000 individuals as CORs from fiscal years 2016 through 2018, and approximately 70 percent of these CORs were non-acquisition personnel.

DOD's efforts to identify civilian and military personnel responsible for overseeing contracts trace back to the National Defense Authorization Act for Fiscal Year 2007, which directed DOD to establish a panel to review areas vulnerable to fraud, waste, and abuse in the defense contracting system, and to make recommendations to eliminate those vulnerabilities.<sup>18</sup> In 2008, this panel recommended that DOD develop a standard for COR certification, with minimums for competencies, experience, and training. Following this recommendation, in 2011, DOD implemented the web-based Contracting Officer Representative Tracking (CORT) tool as a management application to identify personnel serving as CORs, including both acquisition and non-acquisition personnel, and document the standards those personnel have achieved. In February 2014, the USD (AT&L) issued a memorandum to generally require that all military departments and defense agencies use the CORT tool for all contracts where a COR has been designated.<sup>19</sup>

When DOD's contracting officers delegate responsibility for contract monitoring to a COR, they use the CORT tool to record the decision and

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<sup>18</sup>See Pub. L. No. 109-364, § 813.

<sup>19</sup>See USD (AT&L), "Update to the Department of Defense Contracting Officer Representative Tracking Tool" (Feb. 10, 2014).

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to verify the CORs have taken the appropriate training. DOD has established three levels of competency, training, and experience standards for CORs depending on their contracts' dollar values, complexity, and risk.<sup>20</sup> DOD policy also establishes minimum training requirements for CORs based on their specific individual responsibilities. For example, certain CORs would be required to take some or all of the following courses through DAU: Contracting Officer's Representative Course, Contracting Officer's Representative with a Mission Focus, and Contracting Officer's Representatives in a Contingency Environment. DOD policy also allows components to set additional training requirements for their respective organizations. See figure 2 for screenshots of the CORT tool.

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<sup>20</sup>See DODI 5000.72, *DOD Standard for Contracting Officer's Representative (COR) Certification* (Mar. 26, 2015). The Office of Federal Procurement Policy (OFPP) issued guidance in 2011 for the certification of Contracting Officer's Representatives. That guidance stated that it did not apply to DOD, which would continue to follow its own policy. See OFPP, *Revisions to the Federal Acquisition Certification for Contracting Officer's Representatives (FAC-COR)* (Sept. 6, 2011).



**Figure 2: Screenshots of the Contracting Officer Representative Tracking Tool**

**Contracting Officer Representative Tracking (CORT) Tool** User ID : CORTTeste

Menu Exit

**COR Profile**

**Contracting Officer Representative Information**

Work Address \*

City / APO \* State \*  
 - Select -

Zip Code \* Country \*  
 United States

DEROS Date Unit

**Certified Acquisition Official \***  
 No

Career Experience \* Experience Level \*  
 Second Career Experience Second Experience Level  
 Third Career Experience Third Experience Level

Help

Data field indicates whether COR is a member of DOD's acquisition workforce

**Training Course Information**

Course	Training Level	Equivalency?	Provider	Certificate	Completion Date	Hours	Actions	Add
Combating Trafficking in Persons	ABC	<input type="checkbox"/>		SAMPLE - Certificate of Completion - TIP.docx	2013/06/11	0	<a href="#">View</a> <a href="#">Edit</a> <a href="#">Delete</a>	
Misc training as required by local center policy		<input type="checkbox"/>		Certificate of Completion -111.doc	2013/06/03	0	<a href="#">View</a> <a href="#">Edit</a> <a href="#">Delete</a>	
DAU CLM 003 Ethics Training or Agency Equiv	ABC	<input type="checkbox"/>		SAMPLE - Certificate of Completion - Ethics.docx	2013/02/04	0	<a href="#">View</a> <a href="#">Edit</a> <a href="#">Delete</a>	
Misc training as required by local center policy		<input type="checkbox"/>		TEST CERTIFICATE - (Misc - 1) #5.docx	2013/01/01	0	<a href="#">View</a> <a href="#">Edit</a> <a href="#">Delete</a>	
Refresher Training		<input type="checkbox"/>		Certificate of Completion -11.doc	2012/01/01	16	<a href="#">View</a> <a href="#">Edit</a> <a href="#">Delete</a>	
Other		<input type="checkbox"/>		Certificate of Completion -1.doc	2012/01/01	0	<a href="#">View</a> <a href="#">Edit</a> <a href="#">Delete</a>	
DAU CLC 106 COR with a Mission Focus	[A]	<input type="checkbox"/>		SAMPLE - Certificate of Completion - CLC 106.docx	2011/07/03	0	<a href="#">View</a> <a href="#">Edit</a> <a href="#">Delete</a>	
Refresher Training		<input type="checkbox"/>		TEST CERTIFICATE - (REFRESHER -1) #3.pdf	2010/06/22	8	<a href="#">View</a> <a href="#">Edit</a> <a href="#">Delete</a>	
Other		<input type="checkbox"/>		TEST CERTIFICATE - #1.pdf	2010/02/02	0	<a href="#">View</a> <a href="#">Edit</a> <a href="#">Delete</a>	

Help

Save Cancel Help

Source: DOD Contracting Officer Representative Tracking (CORT) Tool - User Guide, Version 2. April 1, 2015. | GAO-19-556

DPC officials stated they use the CORT tool to verify contracting officers are designating CORs appropriately and ensuring the CORs receive the appropriate training. DPC officials plan to expand the tool to include all DOD contracts, regardless of whether the contracting officer has designated a COR to serve on the contract. DPC officials told us identifying all DOD contracts will decrease the likelihood that they may

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not be aware of a contract where the contracting officer has delegated responsibilities to a COR.

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## DOD Has Made Limited Progress Identifying Non-Acquisition Personnel Supporting Services Acquisitions

In contrast to DOD's efforts to identify non-acquisition workforce personnel developing requirements for defense acquisition programs and performing contract oversight, DOD has made limited progress in identifying non-acquisition personnel supporting services acquisitions. Non-acquisition personnel can contribute to various aspects of services acquisitions, such as helping acquisition personnel plan for acquisitions, assess offers submitted by contractors, and subsequently ensure contractors adhere to contract terms. In September 2011, we reviewed 29 services acquisition contracts and found that non-acquisition personnel with acquisition-related responsibilities represented more than half of the 430 individuals who contributed to the contracts in our review.<sup>21</sup> We also found that no DOD organization was responsible for overseeing non-acquisition personnel with acquisition-related responsibilities for services. Further, no DOD organization had systematically identified this population or the competencies the personnel needed to successfully perform their acquisition duties. At the time, DOD officials told us it was challenging to identify the population, in part, because it was transient and dispersed across many DOD organizations. We concluded that DOD did not have sufficient oversight or assurance that the right people with the right skills were involved in the critical phases of services acquisition to ensure successful outcomes.

We recommended that the Secretary of Defense take three actions to help improve services acquisitions:

- Designate an organization that has the responsibility for tracking DOD's progress in identifying, developing, and overseeing non-acquisition personnel with acquisition-related responsibilities;
- Assess what critical skills non-acquisition personnel with acquisition-related responsibilities might require to perform their acquisition duties; and
- Establish criteria and a time frame for identifying non-acquisition personnel with acquisition-related responsibilities.

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<sup>21</sup>[GAO-11-892](#).

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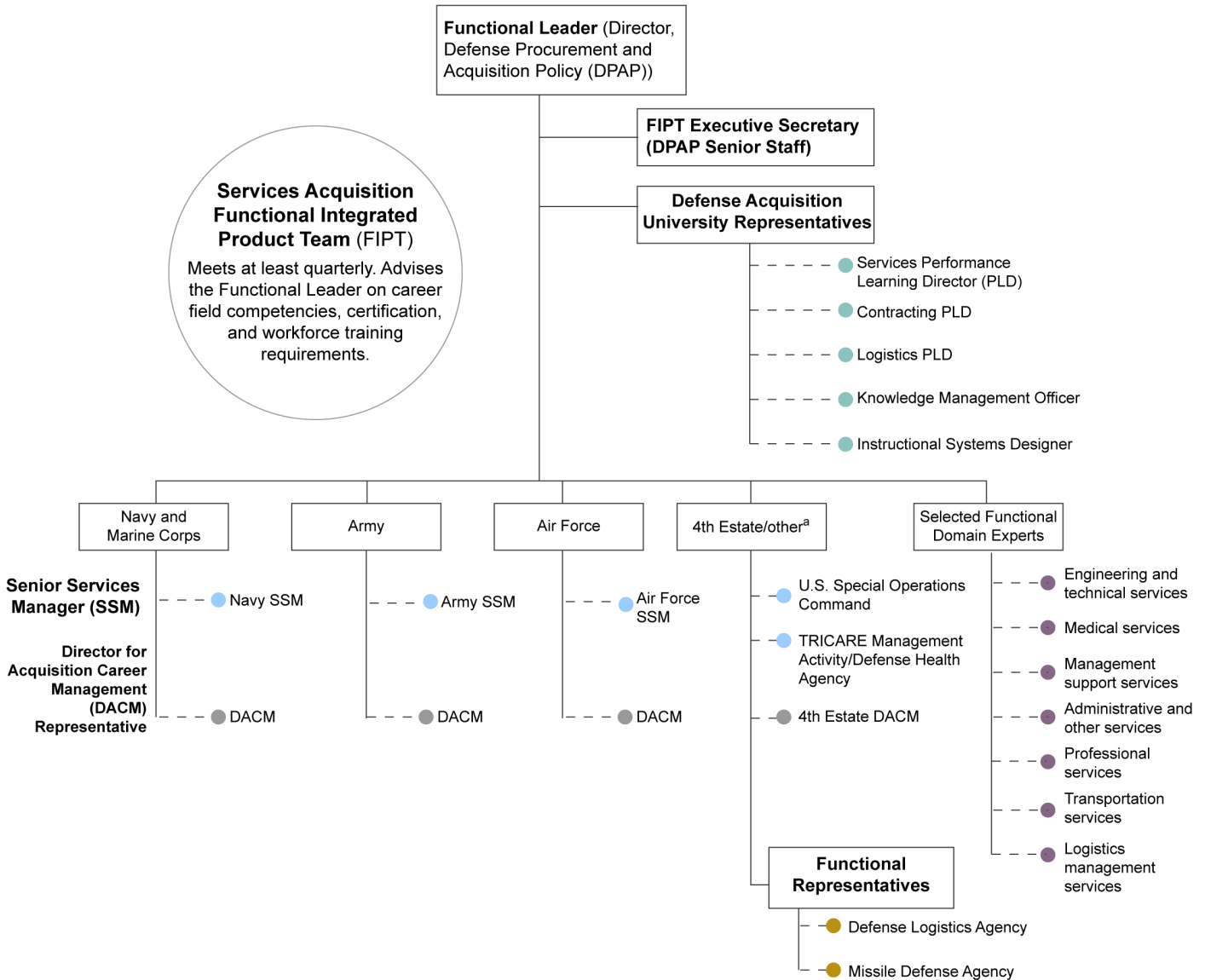
DOD concurred with these three recommendations. In 2013, the Director of Defense Procurement and Acquisition Policy (DPAP)—then DOD’s functional leader for services acquisitions—designated a newly formed team as the organization responsible for overseeing non-acquisition personnel who contribute to services acquisitions.<sup>22</sup> The charter for this body, which is called the Services Acquisition Functional Integrated Product Team (FIPT), stated that the team would address our recommendations. As outlined in the team’s charter, the Services Acquisition FIPT was to help identify and train acquisition and non-acquisition personnel executing all aspects of services acquisitions.<sup>23</sup> The DPAP Director would lead the FIPT, while the military departments, defense agencies, and DAU would provide additional support (see figure 3).

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<sup>22</sup>See DODI 5000.74, *Defense Acquisition of Services* (Incorporating Change 1, Oct. 5, 2017) (describing the responsibilities of Director, DPAP). Defense Pricing/Defense Procurement and Acquisition Policy (DP/DPAP) was renamed the Office of Defense Pricing and Contracting (DPC) in 2018. See USD (A&S), *Organizational Name Change to Defense Pricing and Contracting* (Sept. 11, 2018).

<sup>23</sup>See Defense Procurement and Acquisition Policy, “Acquisition of Services Functional Integrated Product Team (FIPT) Charter,” (Aug. 30, 2013).

**Figure 3: Services Acquisition Functional Integrated Product Team Membership Based on Its 2013 Charter**



Source: GAO analysis of Services Acquisition FIPT Charter. | GAO-19-556

<sup>a</sup>4th Estate is generally comprised of defense agencies and field activities outside the military departments.

In an April 2016 memorandum, the USD (AT&L) identified a need to address issues that related to our two remaining recommendations: DOD should (1) assess the critical skills non-acquisition personnel might require to support acquisition duties, and (2) establish criteria and a

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timeframe for identifying non-acquisition personnel supporting acquisitions.<sup>24</sup> The USD (AT&L) delegated the Director of DPAP (now called DPC), DAU, and the Air Force responsibility for the efforts because they had taken a lead in DOD's efforts to identify non-acquisition personnel contributing to services acquisitions. USD (AT&L) specifically directed them to identify appropriate training for personnel supporting services acquisitions, and to take steps to identify acquisition and non-acquisition personnel contributing to services acquisitions. The USD (AT&L) explicitly required the Director of DPAP, DAU, and the Air Force to develop an integrated master schedule for identifying these personnel by October 2016, and stated that the efforts should involve policy updates, the development of competency-based training, and resource proposals. DOD subsequently addressed our recommendation to assess critical skills when it identified appropriate training, but not our recommendation involving the identification of personnel (see table 3).

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<sup>24</sup>USD (AT&L), "Establishment of the Services Acquisition Manager Functional Area" (Apr. 15, 2016).

**Table 3: DOD Actions Following GAO Recommendations and Under Secretary of Defense (Acquisition, Technology and Logistics) (USD (AT&L)) Memorandum Addressing Services Acquisitions**

GAO recommendations (September 2011)	USD (AT&L) memorandum (April 2016)	Department of Defense (DOD) actions (through May 2019)
Designate an organization with responsibility for tracking DOD's progress in overseeing non-acquisition personnel with acquisition-related responsibilities	N/A	In 2013, the Director of Defense Procurement and Acquisition Policy approved the charter of the Services Acquisition Functional Integrated Product Team (FIPT) that specifically stated it would address GAO's recommendations.
Assess the critical skills non-acquisition personnel might require to support acquisitions and improve acquisition outcomes	Identify appropriate training for personnel supporting services acquisitions	In 2017, DOD issued <i>The DOD Handbook for the Training and Development of the Services Acquisition Workforce</i> , which identifies the competencies that personnel—including non-acquisition personnel—need to successfully contribute to services acquisitions, and includes recommended training courses based on an individual's particular responsibilities.  The Services Acquisition FIPT also helped create a core curriculum for services acquisitions at the Defense Acquisition University (DAU).
Establish criteria and a timeframe for identifying non-acquisition personnel supporting acquisitions	Develop position category descriptions for personnel contributing to services acquisitions <sup>a</sup>	As of May 2019, Defense Pricing and Contracting (DPC), DAU, and the Air Force had not established identification criteria or developed job specialty descriptions. <sup>a</sup>
	Develop an integrated master schedule for identifying personnel contributing to services acquisitions, among other things	As of May 2019, DPC, DAU, and the Air Force had not established a timeframe or developed an integrated master schedule.

Source: GAO, *Defense Acquisition Workforce: Better Identification, Development, and Oversight Needed for Personnel Involved in Acquiring Services*, [GAO-11-892](#) (Washington, D.C. Sept. 28, 2011); USD (AT&L), "Establishment of the Services Acquisition Manager Functional Area" (Apr. 15, 2016); and GAO analysis of DOD documentation. | GAO-19-556

<sup>a</sup>DOD officials subsequently recognized after the issuance of the USD (AT&L) memorandum that developing job specialty descriptions more directly applied to services acquisitions rather than position category descriptions, which are for acquisition career fields. Job specialty descriptions articulate the specific duties and functions for specialized areas of acquisition—in this case, services acquisitions—managed by Functional Leaders.

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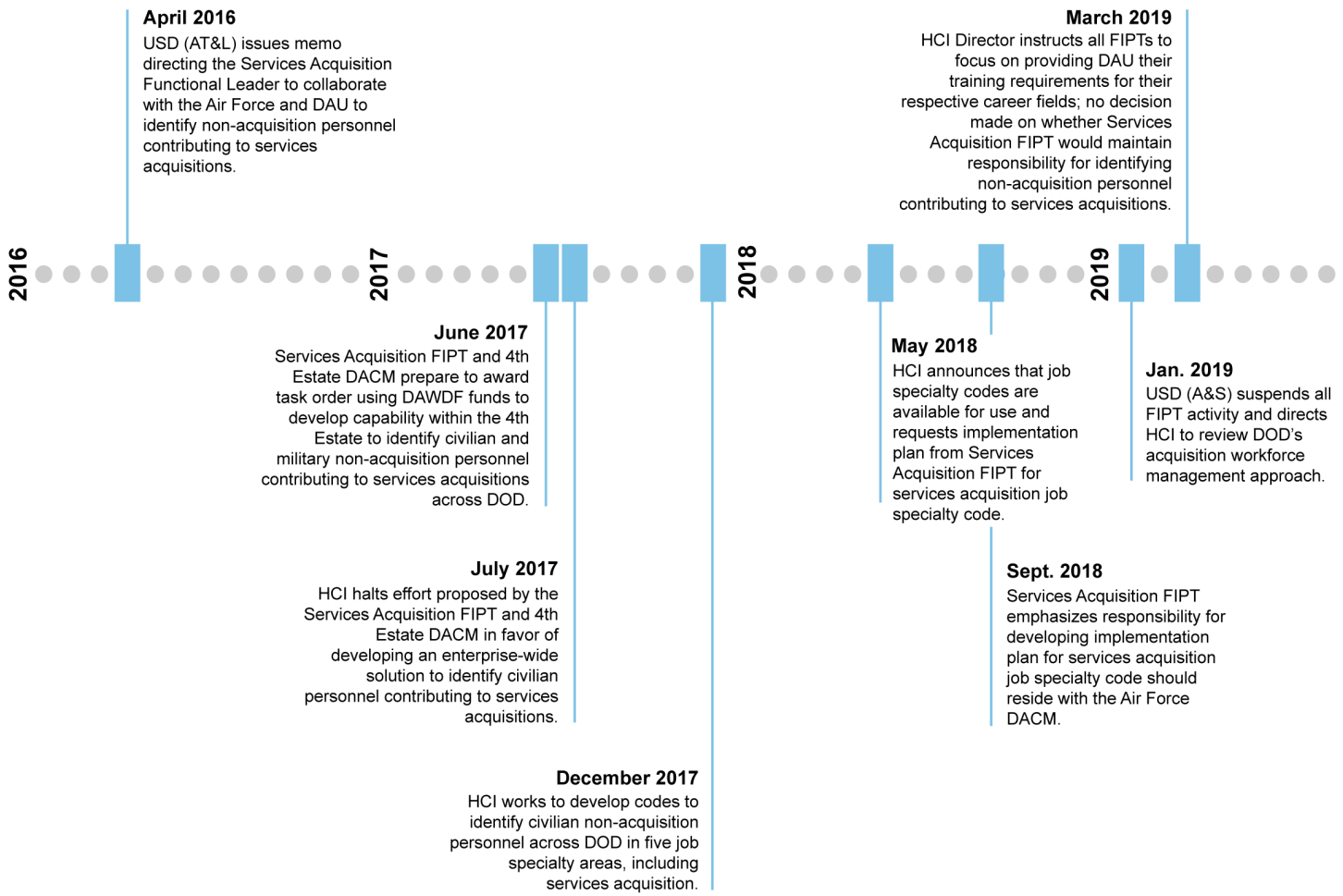
As of May 2019, DPC—DPAP’s successor organization—DAU, and the Air Force had not yet developed job specialty descriptions for non-acquisition personnel supporting services acquisitions, or an integrated master schedule for identifying these individuals.<sup>25</sup> Officials from DPC, DAU, the Air Force, the Human Capital Initiatives (HCI) office under USD (A&S), and the 4th Estate Director for Acquisition Career Management (DACM) described to us a series of events that hindered DOD’s progress in identifying non-acquisition personnel contributing to services acquisitions (see figure 4).<sup>26</sup>

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<sup>25</sup>Job specialty descriptions articulate the specific duties and functions for specialized areas of acquisition—in this case, services acquisitions—managed by Functional Leaders.

<sup>26</sup>HCI is the office under USD (A&S) responsible for DOD-wide acquisition workforce strategic planning. The 4<sup>th</sup> Estate Director for Acquisition Career Management is responsible for the 32 defense agencies and DOD field activities outside the military departments.

**Figure 4: DOD Efforts to Identify Non-Acquisition Personnel Contributing to Services Acquisitions Have Not Been Successful**



DACM – Director, Acquisition Career Management  
 DAU – Defense Acquisition University  
 DAWDF – Defense Acquisition Workforce Development Fund  
 DOD – Department of Defense  
 FIPT – Functional Integrated Product Team  
 HCI – Human Capital Initiatives  
 USD (A&S) – Under Secretary of Defense for Acquisition and Sustainment  
 USD (AT&L) – Under Secretary of Defense for Acquisition, Technology and Logistics

Source: GAO analysis of DOD information. | GAO-19-556

In January 2019, the USD (A&S) suspended the activities of all DOD FIPTs, including the Services Acquisition FIPT, while the Director of HCI assessed DOD's overarching approach to acquisition workforce management. Subsequently, in March 2019, the Director of HCI informed



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Functional Leaders that the FIPTs could resume their activities, limited to completing their annual update documentation to DAU for the training needed for their respective acquisition career fields. However, no decision has been reached as to whether the Services Acquisition FIPT would maintain responsibility for identifying personnel—including non-acquisition personnel—contributing to services acquisitions. The Director of HCI acknowledged the need remains, but the USD (A&S) has not yet determined which office will be assigned this responsibility. Consequently, DOD still has not established how and when it will identify non-acquisition personnel contributing to services acquisitions, or what policy updates and resources may be necessary to identify them.

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**DOD Does Not Have Efforts Underway to Systematically Identify Non-Acquisition Personnel Performing Market Research or Supporting Source Selections**

OSD officials told us that the department does not have efforts in place to systematically identify non-acquisition personnel performing market research or supporting source selections because they do not believe such efforts would provide a good return on investment. OSD officials stated they believe the administrative costs necessary to identify these individuals would exceed the benefits of identifying them, and that there is adequate guidance and training available to these individuals.

OSD officials told us that non-acquisition personnel often perform market research for a relatively short amount of time—sometimes just a few hours—before returning to their primary non-acquisition functions. As such, these officials stated they do not believe it is cost effective to attempt to identify and track non-acquisition workforce personnel who perform market research functions at this time. Nonetheless, OSD officials recognize that non-acquisition personnel often perform this function, and DOD has acknowledged the importance of and need to improve its capabilities to perform market research. DOD has taken steps to improve market research, including:

- In March 2017, DOD issued an updated guide intended to help improve market research efforts when acquiring services.<sup>27</sup> According

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<sup>27</sup>See Defense FAR Supplement (DFARS) § 210.002; DFARS Procedures, Guidance, and Information (PGI) § 210.070 (linking to the “Market Research Report Guide for Improving the Tradecraft in Services Acquisition”). For additional information on market research processes, see GAO, *Market Research: Better Documentation Needed to Inform Future Procurements at Selected Agencies*, [GAO-15-8](#) (Washington, D.C. Oct. 9, 2014). We have also reported on how independent government cost estimates are used as a market research technique to determine that prices are fair and reasonable. GAO, *Service Contracts: Agencies Should Take Steps to More Effectively Use Independent Government Cost Estimates*, [GAO-17-398](#) (Washington, D.C.: May 17, 2017).

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to DOD, the guide reflected the efforts of a joint working group comprised of members from each of the military departments, the Office of the Secretary of Defense, and DAU. The working group identified best practices for conducting and documenting market research, and established standard processes and reports, with the intent of sharing of market research practices across the department. Further, DPC also established links to various resources and training opportunities for market research on its website.

- DOD's January 2018 commercial item guidebook includes sections on using market research to help understand what capabilities exist in the commercial market place that might meet DOD's needs.<sup>28</sup> As noted in the guidebook, the ability to acquire affordable products and services significantly improves when there is an in-depth knowledge of the market and market trends. The handbook further notes that market research should occur multiple times during an acquisition and should not be confined either to initial market research or to market research to determine price reasonableness. Lastly, the handbook notes that the quality of the market research affects the quality of competition, and a DOD component should ensure sufficient resources are available to conduct market research.

Similarly, OSD officials told us non-acquisition personnel supporting source selections often provide this support for a limited amount of time, on a part-time basis. When personnel support source selections over a longer period of time (e.g., for a major defense acquisition program), OSD officials told us that DAU and the military departments generally provide workshops to train these personnel, including non-acquisition personnel. Additionally, DPC's website has links to resources and training opportunities, including DAU's Source Selection course, for individuals who will participate in source selections. As with market research, OSD officials stated they did not believe it would be cost effective to attempt to identify and track non-acquisition personnel who perform source selection activities at this time.

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<sup>28</sup>See PGI § 212.102(a)(i)(2) (linking to the "DOD Guidebook for Acquiring Commercial Items, Part A: Commercial Item Determination"). For additional information on DOD's efforts to identify and price commercial items, see GAO, *Defense Contracts: Improved Information Sharing Could Help DOD Determine Whether Items Are Commercial and Reasonably Priced*, [GAO-18-530](#) (Washington D.C.: July 31, 2018).

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**DOD Does Not  
Comprehensively  
Identify Non-  
Acquisition  
Personnel’s Need for  
Acquisition Training,  
but Does Provide  
Them Access to  
Online Courses**

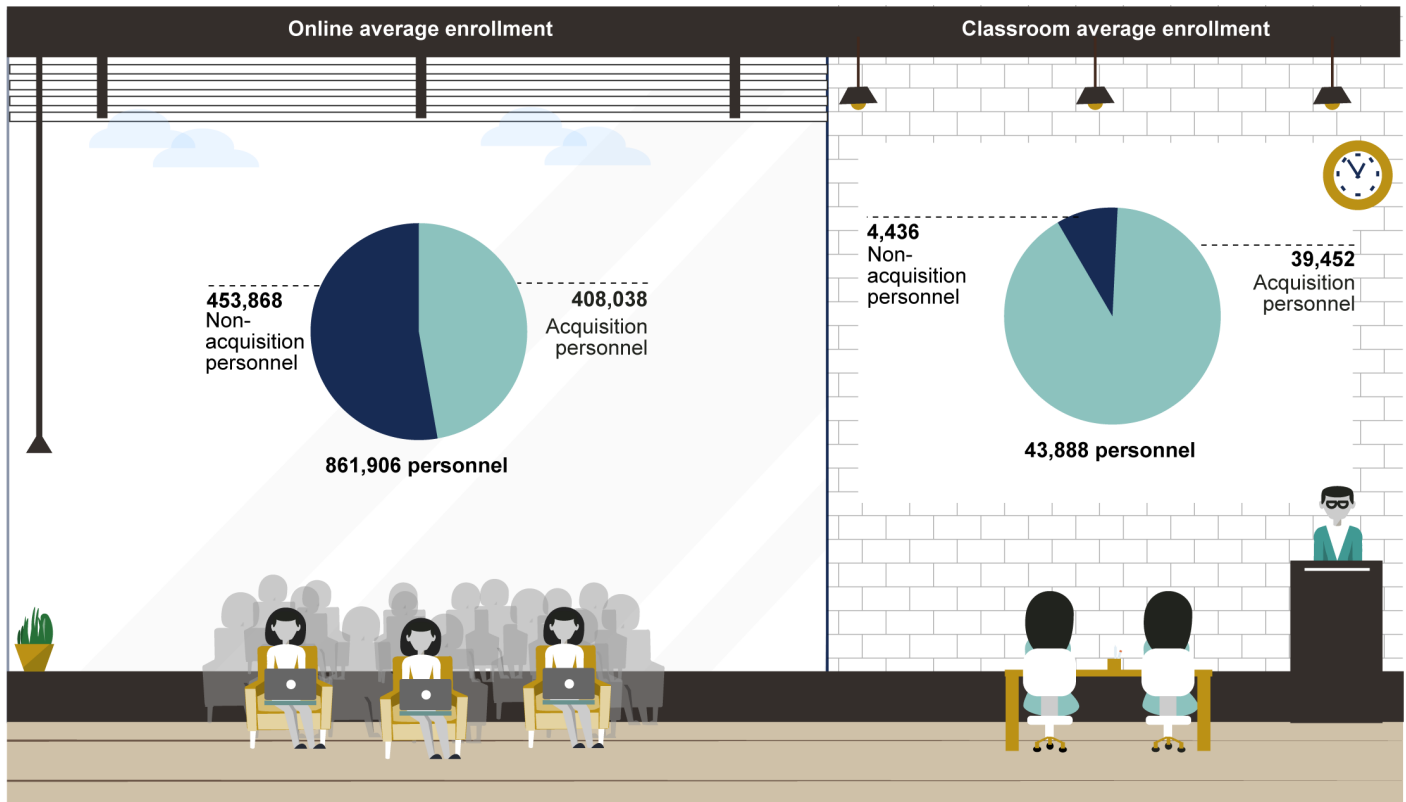
DOD does not comprehensively identify non-acquisition personnel’s need for acquisition-related training, as required. DOD policy requires DOD components (e.g., the military departments and defense agencies) to provide DAU their training requirements for non-acquisition personnel with acquisition-related duties as part of their annual budgeting process.<sup>29</sup> However, we found the components only provided DAU this information for requirements development personnel. As a result, the department cannot determine the extent to which it is meeting all non-acquisition personnel’s acquisition-training needs.

Our work found that, on average, from fiscal years 2016 through 2018, non-acquisition personnel constituted over half of DAU’s online course enrollments and about 10 percent of DAU’s classroom enrollments (see figure 5).

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<sup>29</sup>See DODI 5000.57.

**Figure 5: Average Annual Defense Acquisition University Student Enrollment by Course Delivery for Fiscal Years 2016 through 2018**



Source: GAO analysis of DAU data for fiscal years 2016 through 2018. | GAO-19-556

DAU also offers acquisition training through workshops focused on topics such as services acquisitions and source selection. For example, DAU offered 58 different types of workshops in 2018, but it does not currently maintain data on the number of times it delivered the different types of workshops or the number of participants in each of them. DAU officials told us that non-acquisition personnel have often participated in the workshops, and that DAU is working to better track their participation and the number of workshops it has delivered. DAU personnel also told us they would like to provide more workshops going forward, but they are relatively resource intensive, which restricts their offerings.

Conversely, DAU officials said their online courses are not resource intensive, and that they started taking steps to address capacity limits for online training course enrollment during fiscal year 2011. In fiscal year 2018, DAU transitioned its online courses to a new learning management

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system that removed all enrollment capacity limitations. DAU now provides all DOD personnel—as well as personnel from other government agencies and industry—access to its online training courses. Through these online training courses, DOD’s non-acquisition personnel can access introductory-level training focused on topics such as requirements development, conducting market research, and serving as a contracting officer’s representative.

DAU also offers more advanced courses—not available online—that provide training on how acquisition and non-acquisition personnel contribute to services acquisitions and support source selections, among other things. To manage the inherent capacity constraints of these classroom-based courses, DAU has used a classroom enrollment policy since 2001 that provides DOD’s acquisition personnel higher priority access to these courses than DOD’s non-acquisition personnel (see figure 6).<sup>30</sup>

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<sup>30</sup>DAU officials told us their classroom enrollment policy does not apply to DAU’s requirements development courses, explaining non-acquisition personnel responsible for requirements development are consistently provided access to these courses.

**Figure 6: Defense Acquisition University's (DAU) Priority Level Criteria for Access to Its Classroom Courses for Acquisition-Related Training**

1	<b>Acquisition personnel</b> - DOD training required to achieve certification requirements for position
2	<b>Acquisition personnel</b> - DOD training requested for certification at higher level than required for current position
3	<b>Acquisition personnel</b> - DOD cross-certification in another career field, other than primary position
4	<b>Non-acquisition personnel</b> - DOD training requested to perform acquisition-related functions
5	<b>Other personnel</b> - federal civilian agencies, industry, or walk-ins

Source: GAO analysis of DAU policy. | GAO-19-556

Note: DAU also applies these criteria to courses led virtually by an instructor, but not to classroom courses for the requirements development curriculum.

DAU officials believe this prioritization system is appropriate given that DAWIA established that a primary mission of DAU is to train DOD acquisition personnel.<sup>31</sup> However, DAU lacks a complete understanding of non-acquisition personnel's need for acquisition training. As noted above, DOD policy requires DOD components to provide DAU annual training requirements for non-acquisition personnel. Specifically, DOD Instruction 5000.57 states that DOD Component Heads, acting through their Component Acquisition Executives (CAE), will "provide to DAU their annual student training requirements, and associated budgetary requirements for travel and per diem for Defense Acquisition Workforce

<sup>31</sup>See Pub. L. No. 101-510, § 1205 (1990) (relevant section codified as amended at 10 U.S.C. § 1746).

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personnel [...and] non-acquisition personnel with acquisition related duties[.]” The instruction also states that the President of DAU should use this information to help develop DAU’s resourcing requirements, and that the DAU President should submit these requirements through DOD’s planning, programming, budgeting, and execution process—the process DOD uses each year to identify and prioritize resource requirements, and allocate funding to the military departments and defense agencies, including DAU.<sup>32</sup>

We found, however, that this is not happening in practice. The CAEs have instead assigned responsibility to their respective DACMs to provide DAU their organizations’ annual training needs. According to DOD policy, however, the DACMs are not responsible for non-acquisition personnel, and instead are responsible for ensuring acquisition personnel receive appropriate training.<sup>33</sup> Further, the DACMs we interviewed told us they do not provide DAU information about non-acquisition personnel training needs for this reason. Instead, they focus on providing DAU information about acquisition personnel training needs. The CARs, which are responsible for identifying non-acquisition personnel who are requirements developers, provide information about requirements development training needs, but that is the only area in which components communicate training needs for non-acquisition personnel to DAU (see figure 7).

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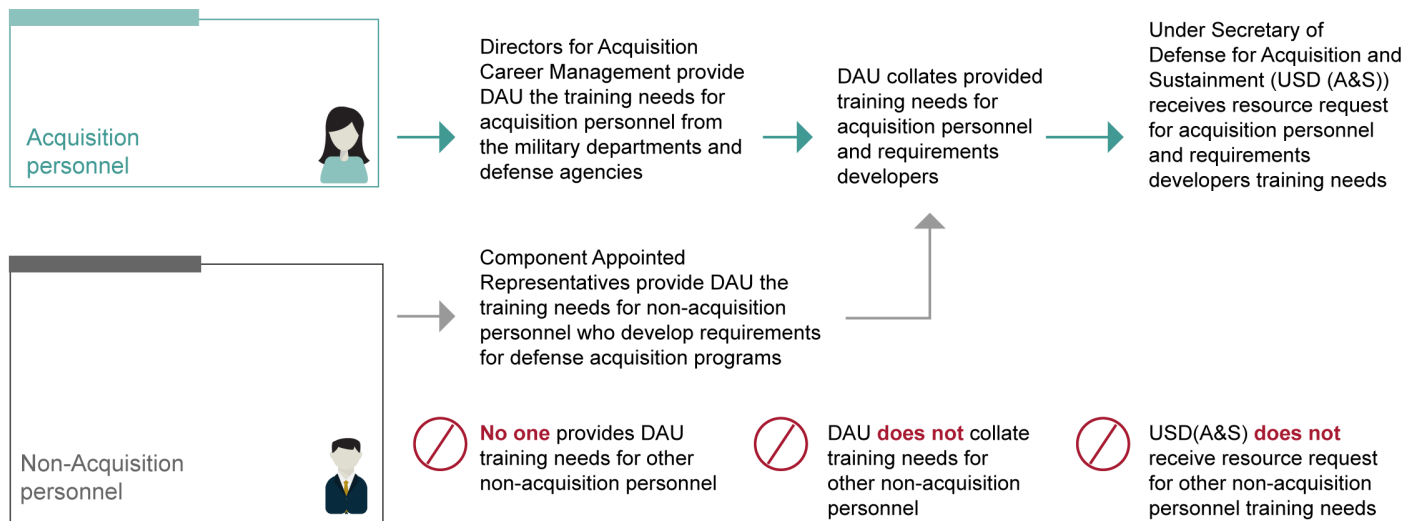
<sup>32</sup>See DODI 5000.57; DOD Directive 7045.14, “The Planning, Programming, Budgeting, and Execution (PPBE) Process” (Jan. 25, 2013).

<sup>33</sup>See DODI 5000.66.

**Figure 7: Department of Defense (DOD)'s Process for Informing the Defense Acquisition University (DAU)'s Annual Resource Request**

**Component Acquisition Executives**

DOD Component Acquisition Executives should account for **acquisition** and **non-acquisition** personnel when they provide the Defense Acquisition University (DAU) their annual training needs



Source: GAO analysis of Department of Defense policy. | GAO-19-556

DAU leadership—particularly the DAU Director for Performance and Resource Management—has some insight into non-acquisition personnel’s unmet need for classroom training through its course waitlists, but officials we spoke with said non-acquisition personnel often do not attempt to enroll in classroom training courses because they know they are a low priority. As a result, DAU’s waitlists do not reflect non-acquisition personnel’s actual need for classroom training.

The CAEs have not accounted for many non-acquisition personnel, as required by DOD policy, because the CAEs have relied on their respective DACMs—who are primarily responsible for acquisition personnel—to provide DAU their organizations’ annual training needs. As a result, DAU leadership lacks complete data to help determine the extent to which DAU is meeting non-acquisition personnel’s need for acquisition-related training, increasing the risk that DAU is not providing non-acquisition personnel the knowledge and skills needed to contribute effectively to the department’s acquisitions.



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## Conclusions

DOD has taken several positive steps to better identify and train non-acquisition personnel supporting acquisitions, particularly in the areas of requirements development and contract oversight. However, from 2013 to 2019, DOD made limited progress in identifying non-acquisition personnel contributing to services acquisitions. To date, the department has not yet developed job specialty descriptions for these personnel, or established a schedule for identifying them as USD (AT&L) directed. Further, there currently is no office or official designated to do so, hindering efforts to complete these tasks. Given that half of DOD's contract dollars are spent on services acquisitions, ensuring that non-acquisition personnel who perform acquisition-related functions on these acquisitions are identified and appropriately trained may help DOD improve how it acquires contract services.

With regard to training of non-acquisition personnel, DAU is not being provided information on the training needs of non-acquisition personnel. Under DOD policy, the CAEs are responsible for doing so. The CAEs rely upon their DACMs to provide DAU with their training needs, but the DACMs are typically not responsible for non-acquisition personnel and have not provided DAU the required information. Ensuring that designated officials carry out their responsibilities to provide DAU data on the training needs of non-acquisition personnel can help inform decisions on resource requirements and the most appropriate ways to meet these needs. Until DOD takes these actions, there is greater likelihood that non-acquisition personnel may not be positioned to help DOD successfully obtain the goods and services it needs.

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## Recommendations for Executive Action

We are making the following two recommendations to the Secretary of Defense:

The Secretary of Defense should ensure that the Under Secretary of Defense for Acquisition and Sustainment designates an accountable official responsible for (a) developing job specialty descriptions to help identify non-acquisition personnel supporting services acquisitions; and (b) establishing a schedule to identify these personnel. (Recommendation 1)

The Secretary of Defense should ensure that the Component Acquisition Executives provide non-acquisition personnel training needs to the Defense Acquisition University as part of the annual planning, programming, budgeting, and execution process. (Recommendation 2)

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## Agency Comments and Our Evaluation

We provided a draft of this report to DOD for review and comment. DOD provided written comments, which are reprinted in appendix III, and concurred with our two recommendations. In concurring with our recommendation to designate an accountable official responsible for (a) developing job specialty descriptions to help identify non-acquisition personnel supporting services acquisitions, and (b) establishing a schedule to identify these personnel, DOD described the role of OSD and the DOD components. DOD noted that OSD would develop and provide the guidance and job specialty descriptions for components to use for identifying acquisition and non-acquisition personnel supporting services acquisitions. DOD also noted that the Director of HCI has deployed an enterprise-wide coding capability for components to use in identifying acquisition and non-acquisition civilians across DOD. Both of these actions are positive steps, and the multiple organizations involved in the actions further illustrate the need to designate an accountable official responsible for efforts to help identify non-acquisition personnel supporting services acquisitions. DOD also provided technical comments, which we incorporated as appropriate.

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We are sending copies of this report to the appropriate congressional committees; the Secretary of Defense; the Secretaries of the Army, the Air Force, and the Navy; the Under Secretary of Defense for Acquisition and Sustainment; and the President, Defense Acquisition University. In addition, the report is also available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-4841 or [dinapolit@gao.gov](mailto:dinapolit@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix IV.



Timothy J. DiNapoli  
Director, Contracting and National Security Acquisitions

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*List of Committees*

The Honorable James M. Inhofe  
Chairman

The Honorable Jack Reed  
Ranking Member  
Committee on Armed Services  
United States Senate

The Honorable Richard Shelby  
Chairman

The Honorable Dick Durbin  
Ranking Member  
Subcommittee on Defense  
Committee on Appropriations  
United States Senate

The Honorable Adam Smith  
Chairman

The Honorable Mac Thornberry  
Ranking Member  
Committee on Armed Services  
House of Representatives

The Honorable Pete Visclosky  
Chairman

The Honorable Ken Calvert  
Ranking Member  
Subcommittee on Defense  
Committee on Appropriations  
House of Representatives

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# Appendix I: Objectives, Scope, and Methodology

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Section 843(d) of the National Defense Authorization Act for Fiscal Year 2018 included a provision for us to review steps the Department of Defense (DOD) has taken to ensure non-acquisition personnel receive appropriate acquisition-related training, including:

- (a) the extent to which non-acquisition workforce personnel play a significant role in defining requirements, conducting market research, participating in source selection and contract negotiation efforts, and overseeing contract performance;
- (b) the extent to which DOD is able to identify and track non-acquisition workforce personnel performing the roles identified in (a);
- (c) the extent to which non-acquisition workforce personnel are taking acquisition training;
- (d) the extent to which Defense Acquisition Workforce Development Funds (DAWDF) have been used to provide acquisition training to non-acquisition workforce personnel;
- (e) the sources of funding other than DAWDF that are available to and used by DOD to provide non-acquisition workforce personnel with acquisition training; and
- (f) the extent to which additional acquisition training is needed for non-acquisition workforce personnel, including the types of training needed, the positions that need training, and any challenges to delivering necessary training.<sup>1</sup>

This report examines the extent to which DOD can identify: (1) non-acquisition personnel supporting acquisitions; and (2) non-acquisition personnel's acquisition training needs. We did not examine the extent to which DOD has identified non-acquisition personnel negotiating contracts because we determined non-acquisition personnel are not authorized to negotiate contracts. We made this determination based on our review of the Federal Acquisition Regulation, which states that negotiations are exchanges that allow offerors to revise their proposals, and that the

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<sup>1</sup>National Defense Authorization Act for Fiscal Year 2018, Pub. L. No. 115-91, § 843(d) (Dec. 12, 2017).

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discussions regarding these proposals must be conducted by contracting officers, who are members of the acquisition workforce.<sup>2</sup>

To assess the extent to which DOD has identified non-acquisition personnel supporting acquisitions, we reviewed three key DOD initiatives intended to identify non-acquisition personnel: (1) developing requirements for defense acquisition programs; (2) overseeing contracts for products and services; and (3) contributing to services acquisitions more generally. We also reviewed DOD efforts to identify non-acquisition personnel performing market research and supporting source selections, two important aspects of all acquisitions. To understand requirements for DOD to identify such personnel, we reviewed relevant statutes, federal and defense acquisition regulations, and DOD instructions and policies. To understand DOD's processes for identifying these personnel, we reviewed memorandums from acquisition leaders, charters from teams responsible for identifying requirements developers and non-acquisition personnel who contribute to services acquisitions, the user guide for a system that tracks non-acquisition personnel overseeing contracts—DOD's Contracting Officer Representative Tracking (CORT) tool—and other key documents. We also reviewed personnel documentation identifying non-acquisition personnel with requirements development or contract oversight responsibilities. To supplement this documentation, we interviewed officials from the military departments and the Defense Acquisition University (DAU) that are responsible for identifying requirements developers, representatives from the Office of Defense Pricing and Contracting (DPC) responsible for implementing the CORT tool, and DPC and Air Force officials responsible for identifying non-acquisition personnel contributing to services acquisitions. Additionally, we interviewed DOD acquisition personnel and DAU officials to understand how DOD approaches non-acquisition personnel conducting market research and supporting source selections.

To assess the extent to which DOD has identified non-acquisition personnel's acquisition-related training needs, we interviewed OSD and military department officials responsible for acquisition training. These individuals included DAU's Director for Performance and Resource Management and its learning directors for services acquisitions and contracting, and each of DOD's Directors for Acquisition Career Management or their representatives. Through our discussions, we

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<sup>2</sup>See Federal Acquisition Regulation § 15.306(d)(1) and (3).

determined that the military departments do not centrally manage the acquisition-related training for non-acquisition personnel. As a result, we focused on the training provided by DAU based on its established role in DOD policy.<sup>3</sup> To understand DAU's responsibilities for training non-acquisition personnel, we interviewed DAU officials responsible for developing its curriculum and training schedule, and reviewed DOD Instructions and DAU's operating policies, including its policy for enrolling students. To supplement this documentation, at each military department, we interviewed senior acquisition officials responsible for enrolling their personnel in DAU courses to understand how they coordinate with DAU. We also reviewed DAU training data from fiscal years 2016 through 2018 to determine the amount of training DAU provided, how DAU delivered that training—online versus classroom courses—and the number of non-acquisition personnel who received the training. To determine the data were reliable for reporting the number of non-acquisition personnel enrolled in DAU training, we interviewed the DAU official responsible for maintaining DAU's enrollment data, and reviewed pertinent documents such as DAU's guidance for building the academic schedule to understand the processes and procedures for student enrollment. We found these data to be reliable for reporting the number of non-acquisition personnel enrolled in DAU training. Additionally, we reviewed DAU's curriculum and identified courses related to requirements development, market research, source selection, contract negotiation, and contract oversight.<sup>4</sup> To determine the extent of the use of DAWDF, we reviewed the Office of Human Capital Initiatives' annual DAWDF reports for the amounts of these funds provided to DAU. We also reviewed the Operations and Maintenance funds documents provided by the Office of the Under Secretary of Defense (Comptroller) to determine the amount of these funds budgeted for DAU for fiscal years 2016 to 2018.

We conducted this performance audit from July 2018 to September 2019 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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<sup>3</sup>See DOD Instruction 5000.57, *Defense Acquisition University (DAU)* (Aug. 31, 2018).

<sup>4</sup>Appendix II provides a list of DAU courses that address the functions that we reviewed in this report.

# Appendix II: Defense Acquisition University Courses That Provide Training Relevant to Selected Acquisition-Related Functions

In fiscal year 2018, the Defense Acquisition University (DAU) offered 57 courses associated with the performance of each, or a multiple, of the following acquisition-related functions: requirements development, market research, source selection, contract negotiation, and contract oversight. Table 4 identifies these courses and how DAU delivered them—online versus classroom.

**Table 4: Courses the Defense Acquisition University (DAU) Offered in Fiscal Year 2018 That Are Associated with Acquisition-Related Functions Identified in Sec. 843(d) of the National Defense Authorization Act for Fiscal Year 2018**

DAU Course Code	Course Title	Acquisition-Related Function(s)	Course Delivery
ACQ 165	Defense Acquisition of Services	Multiple	Online
ACQ 265	Mission-Focused Services Acquisition	Multiple	Classroom
ACQ 340	Advanced International Management Workshop	Multiple	Classroom
ACQ 380	International Acquisition Management	Multiple	Classroom
CLB 040	Should-Cost Management	Contract oversight	Online
CLC 004	Market Research	Market research	Online
CLC 006	Contract Terminations	Contract oversight	Online
CLC 007	Contract Source Selection	Source selection	Online
CLC 013	Services Acquisition	Multiple	Online
CLC 047	Contract Negotiation Techniques	Contract negotiation	Online
CLC 055	Competition Requirements	Multiple	Online
CLC 106	Contracting Officer's Representative with a Mission Focus	Contract oversight	Online
CLC 206	Contracting Officer's Representatives in a Contingency Environment	Contract oversight	Online
CLC 222	Contracting Officer's Representative Online Training	Contract oversight	Online
CLE 017	Technical Planning	Multiple	Online
CLE 028	Market Research for Engineering and Technical Personnel	Market research	Online
CLL 039	Product Support Requirements Identification	Requirements development	Online
CLM 005	Industry Proposals and Communication	Source selection	Online
CLM 059	Fundamentals of Small Business for the Acquisition Workforce	Multiple	Online
CLR 030	Environment, Safety, and Occupational Health of JCIDS	Requirements development	Online
CLR 101	Introduction to Joint Capabilities Integration and Development System	Requirements development	Online
CLR 151	Analysis of Alternatives	Requirements development	Online
CLR 250	Capabilities-Based Assessment	Requirements development	Online
CLR 252	Developing Performance Attributes	Requirements development	Online
CLV 020	Baseline Maintenance	Contract oversight	Online

**Appendix II: Defense Acquisition University  
Courses That Provide Training Relevant to  
Selected Acquisition-Related Functions**

<b>DAU Course Code</b>	<b>Course Title</b>	<b>Acquisition-Related Function(s)</b>	<b>Course Delivery</b>
CMA 100	Fundamentals of Government Flight Representative and Ground Government Flight Representative	Contract oversight	Online
CMA 241	Government Flight and Ground Representative	Contract oversight	Classroom
CMC 100	Contract Administration Fundamentals	Contract oversight	Online
CMC 130	Introduction to Indirect Cost Rates	Contract oversight	Online
CMC 150	Introduction to Terminations	Contract oversight	Online
CME 201	Engineering Surveillance	Contract oversight	Online
CMI 100	Integrated Program Reporting Basics	Contract oversight	Online
CMI 103	DCMA First-Level Supervisor Support to NASA	Contract oversight	Online
CMI 140	Multifunctional Surveillance of Prime Suppliers' Control of Subcontractors	Contract oversight	Online
CMI 207	DCMA Multifunctional Support to NASA	Contract oversight	Online
CON 121	Contract Planning	Multiple	Online
CON 124	Contract Execution	Contract oversight	Online
CON 127	Contract Management	Contract oversight	Online
CON 200	Business Decisions for Contracting	Multiple	Online
CON 243	Architect-Engineer Contracting	Multiple	Classroom
CON 244	Construction Contracting	Multiple	Classroom
CON 270	Intermediate Cost and Price Analysis	Source selection	Classroom
CON 280	Source Selection and Administration of Services Contracts	Source selection	Classroom
CON 290	Contract Administration and Negotiation Techniques in a Supply Environment	Multiple	Classroom
COR 206	Contracting Officer's Representatives in a Contingency Environment	Contract oversight	Online
COR 222	Contracting Officer's Representative Course	Contract oversight	Classroom
HBS 305	Negotiating for Results, High Bandwidth	Contract negotiation	Online
HBS 428	Negotiating	Contract negotiation	Online
RQM 110	Core Concepts for Requirements Management	Requirements development	Online
RQM 310	Advanced Concepts and Skills for Requirements Management	Requirements development	Classroom
RQM 403	Requirements Executive Overview Workshop	Requirements development	Classroom
RQM 413	Senior Leader Requirements Course	Requirements development	Online
SBP 101	Introduction to Small Business Programs, Part A	Multiple	Online
SBP 102	Introduction to Small Business Programs, Part B	Multiple	Classroom
SBP 201	Intermediate Small Business Programs, Part A	Multiple	Online
SBP 202	Intermediate Small Business Programs, Part B	Multiple	Classroom
SBP 210	Subcontracting	Contract oversight	Classroom

Source: GAO analysis of DAU information. | GAO-19-556



# Appendix III: Comments from the Department of Defense



ACQUISITION

THE ASSISTANT SECRETARY OF DEFENSE  
3600 DEFENSE PENTAGON  
WASHINGTON, DC 20301-3600

AUG 19 2019

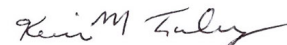
Mr. Timothy J. DiNapoli  
Director, Contracting and National Security Acquisitions  
U.S. Government Accountability Office  
441 G Street, N.W.  
Washington DC 20548

Dear Mr. DiNapoli,

This is the Department of Defense (DoD) response to the GAO Draft Report GAO-19-556, "DEFENSE WORKFORCE: Steps Needed to Identify Acquisition Training Needs for Non-Acquisition Personnel," dated August 2019 (GAO Code 102913). The Department appreciates the effort of the GAO and the opportunity to comment on the final report.

The Department acknowledges receipt of the draft report and notes that DoD's official written comments will be included in the final report. The DoD concurs with both of GAO's recommendations as described in the enclosure.

My point of contact is Adam N. Stroup, Defense Acquisition University, who can be reached at [adam.stroup@dau.edu](mailto:adam.stroup@dau.edu) or (703) 805-3309.

  
Kevin M. Fahey

Enclosure:  
As stated

GAO DRAFT REPORT DATED JUNE 27, 2019  
GAO-19-556 (GAO CODE 102913)

“DEFENSE WORKFORCE: STEPS NEEDED TO IDENTIFY ACQUISITION  
TRAINING NEEDS FOR NON-ACQUISITION PERSONNEL”

DEPARTMENT OF DEFENSE COMMENTS  
TO THE GAO RECOMMENDATION

**RECOMMENDATION 1:** The GAO recommends that the Secretary of Defense should ensure that the Under Secretary of Defense for Acquisition and Sustainment designates an accountable official responsible for (a) developing job specialty descriptions to help identify non-acquisition personnel supporting services acquisitions, and (b) establishing a schedule to identify these personnel.

**DoD RESPONSE:** DoD Concur. It is important to accurately distinguish between the roles of OSD and the components. OSD would develop and provide the enterprise guidance and job specialty description for components to use for identifying acquisition and non-acquisition personnel supporting services acquisitions. The Director of Human Capital Initiatives (HCI) has deployed an enterprise-wide coding capability, based on using the Defense Civilian Personnel Data System, for components to use in identifying acquisition and non-acquisition civilians across DoD.

**RECOMMENDATION 2:** The GAO recommends that the Secretary of Defense should ensure that the Component Acquisition Executives provide non-acquisition personnel training needs to the Defense Acquisition University as part of the annual planning, programming, budgeting, and execution process.

**DoD RESPONSE:** DoD Concur.

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# Appendix IV: GAO Contact and Staff Acknowledgments

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## GAO Contact

Timothy J. DiNapoli at (202) 512-4841 or [dinapolit@gao.gov](mailto:dinapolit@gao.gov)

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## Staff Acknowledgments

In addition to the contact named above, Nathan Tranquilli (Assistant Director), Stephen V. Marchesani (Analyst-in-Charge), Jon Muchin, and Suzanne Sterling made key contributions to this report. Peter W. Anderson, Lorraine Ettaro, Gina Hoover, Miranda Riemer, and Robin Wilson also made substantial contributions.

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