

AGENCY INVENTORY ANALYSIS SERVICE CONTRACT INVENTORY CONSUMER PRODUCT SAFETY COMMISSION FY 2016

In accordance with section 743(e) of Division C of the FY 2011 Consolidated Appropriations Act, P.L. 111-117, the Consumer Product Safety Commission's agency inventory analysis includes a review of the contracts and information in the inventory as set forth below:

1. The Consumer Product Safety Commission has reviewed the identified two contracts (Special Interest Functions, D302 and D313- see chart below) in the inventory to determine whether any personal services contracts have been entered into, and are being performed, in accordance with applicable laws and regulations. These are the only two Codes of Interest out of the 10 four character services codes with the largest obligation amounts for FY 2016.

PSCs	Special Interest Function	FY-2016 Obligation
D302	IT Systems Development Services	\$2,650,703.94
D313	IT Computer-aided Design	\$2,308,208.77

The review included a questionnaire checklist given to the Contracting Officer Representative (COR) for each contract. Based on the review it has been determined that no personal services contracts have been entered into during this period.

2. The Consumer Product Safety Commission has given special management attention, as set forth in FAR 37.114, to functions that are closely associated with inherently governmental functions.
3. Based on the review of each Special Interest Function contracts (as defined in FAR 7.5) it has been determined that the Consumer Product Safety Commission is not using contractor employees to perform inherently governmental functions.
4. The Consumer Product Safety Commission has specific safeguards and monitoring systems in place to ensure that work being performed by contractors has not changed or expanded during performance to become an inherently governmental function. These safeguards involve review of performance by the CPSC Contracting Officer's Representatives (COR) and Procurement Officials.

5. The Consumer Product Safety Commission is not using contractor employees to perform critical functions in such a way that could affect the ability of the agency to maintain control of its mission and operations.
6. The Consumer Product Safety Commission has ensured that there are sufficient internal agency resources to manage and oversee contracts effectively.

Responsible Officials

The senior agency management official who is accountable for the development of procurement policies, procedures, and training associated with OFPP Policy Letter 11-10 addressing the performance of inherently governmental and critical functions is Eddie Ahmad, Acting Director, Division of Procurement Services.

The official who is responsible for ensuring appropriate internal management attention is given to the development and analysis of service contract inventories is Cassandra Sterba, Contract Specialist.



Cassandra Sterba, Contract Specialist



Date

Concurrence



Eddie Ahmad, Acting Director, Division of Procurement Services



Date

Plan for analyzing the FY 2017 data

In accordance with the Service Contract Inventory checklist of Submissions, Formats and Deadlines attached to the 12/19/2011 Memo from Daniel I Gordon as revised, the Consumer Product Safety Commission is submitting the identified Special Interest Functions for FY 2017.

The functions are:

- D302 IT Systems development Services and
- D319 IT and Telecom – Annual Software Maintenance Plans

These two Codes of Interest (D302 and D319) represent the largest contracts at CPSC with the largest obligations in FY 2017. CPSC intends to analyze both codes above as has been done in the past. The amount obligated for D302 in 2016 was \$2,650,703.94 and \$2,052,713.66 for D319.

CPSC's analysis will be of the contracts under these codes.