

**AGENCY INVENTORY ANALYSIS
SERVICE CONTRACT INVENTORY
CONSUMER PRODUCT SAFETY COMMISSION
Fiscal Year 2017**

Under section 743(e) of Division C of the FY 2011 Consolidated Appropriations Act, Public Law No. 111-117, the U.S. Consumer Product Safety Commission's (CPSC's) agency inventory analysis includes a review of the contracts and information in the inventory, as set forth below:

1. The CPSC, in accordance with applicable laws and regulations, reviewed the three contracts identified in the inventory to determine whether any personal services contracts have been entered into and are being performed (Special Interest Functions, D302 and D319- see chart below). These are the only two Codes of Interest out of the 10 four-character services codes with the largest obligation amounts for FY 2017.

PSCs	Special Interest Function	FY 2017 Obligation
D302	IT and Telecom – Systems Development	\$1,553,675.97
D319	IT and Telecom- Annual Software Maintenance Service Plans	\$1,700,911.11

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

2. The CPSC 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), the CPSC is not using contractor employees to perform inherently governmental functions.
4. The CPSC 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 include reviewing the performance of CPSC CORs and Procurement Officials.

5. The CPSC 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 CPSC has ensured that there are sufficient internal agency resources to manage and oversee contracts effectively.

Responsible Officials:

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

Cassandra Sterba, CPSC Contract Specialist, is the official responsible for ensuring that appropriate internal management attention is given to developing and analyzing service contract inventories.

Cassandra Sterba, Contract Specialist

Date

Concurrence:

Eddie Ahmad, Acting Director, Division of
Procurement Services

Date

Plan for analyzing the FY 2018 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 2018.

The functions are:

- D302 IT and Telecom – Systems Development
- D314 IT and Telecom – System Acquisition Support

These two Codes of Interest (D302 and D314) represent services at CPSC with significant obligations in FY 2018, and which also include the highest risk for personal services. CPSC intends to analyze both codes above as has been done in the past. In FY 2018, CPSC obligated \$2,947,990.91 to D302 and \$665,161.25 to D314.

Additionally, per OMB guidance for FY 2018, agencies are encouraged to analyze PSCs R499 (Support – Professional: Other), R699 (Support – Administrative: Other) and R799 (Support – Management: Other) in their plan if the PSCs have not already been reviewed. CPSC did not review either of the suggested PSCs in FY 2017. Therefore, the FY 2018 reviewed functions also include:

- R499 Support – Professional: Other
- R699 Support – Administrative: Other

CPSC intends to analyze both codes included in the OMB guidance in the same manner as the Codes of Interest (D302 and D314) identified by CPSC. In FY 2018, CPSC obligated \$323,201.93 to R499 and \$1,012,314.03 to R699.

CPSC's FY 2018 analysis will be of contracts under the codes listed above.