

AGENCY INVENTORY ANALYSIS SERVICE CONTRACT INVENTORY CONSUMER PRODUCT SAFETY COMMISSION FY 2015

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 D307- 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 2015

| PSCs | Special Interest Function | FY-2015 Obligation |
|------|--|--------------------|
| R302 | IT Systems Development Services | \$32,132.80 |
| R307 | Automated Information Systems Services | \$1,145,949.07 |

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 11-01 addressing the performance of inherently governmental and critical functions is Kim Miles, 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 Eddie Ahmad, Procurement Analyst


Eddie Ahmad, Supervisory Contract Specialist

2/14/17
Date

Concurrence

Kim Miles, Director, Division of Procurement Services

2/14/17
Date

Plan for analyzing the FY 2016 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 2016.

The functions are:

- D302 IT Systems development Services and
- D313 IT Computer aided design

These are the only two Codes of Interest (D302 and D313) out of the 10 four character services codes with the largest obligation amounts for FY 2016, CPSC intends to analyze both codes above as has been done in the past. The amount obligated for D302 in 2015 was \$1,145,949.07 and \$0 for code D313.

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