



DoD North Central Regional Council Fall Training Workshop Post-award Functions "Evaluating, Reviewing, and Writing Prime/ Subcontracting Performance in Contractor Performance Assessment Reporting System (CPARS)"



Presenter:

Dr. Jeanette Robinson, Small Business Professor Defense Acquisition University Chairperson, DoD North Central Regional Council



Overview



✓What is CPAR

- Latest CPAR Updates as of Jul 2018
 What is rated (when applicable)
- What does it say About Small Business CPARS Small Business Entry
- Program Managers, Contracting Officers, &Small Business Professionals Review Entries in CPARS
- What Should Acquisition Professionals Look for in CPARs
- Sample CPAR Review Activity





What is CPARS?



- CPARS (Contractor Performance Assessment Reporting System) is a web-enabled application that collects and manages a library of automated contractor performance data.
- FAR 42.1502 covers using CPARS.
- CPARS and the Past Performance Information Retrieval System (PPIRS) are distinct systems.
- CPARS is used to assess a contractor's performance.
 The assessment data is available through PPIRS.
- PPIRS should only be used in source selection.





CPARS Generated PPI



- Contractor's performance evaluation is a method of recording contractor performance and is not the primary method for reporting performance information to the contractor.
- Evaluations should be an objective report during the performance period against the contract/ordering requirements.
- Information in the evaluation represents the contractor's performance appraisal; therefore it should accurately depict the contractors performance.





- Ensure Current, Complete and Accurate on Contractor's Performance available for source selections.
- Completed performance evaluations are used as a resource in awarding best value to contractors that consistently provide quality, on-time products and services that conform to contractual requirements.





CPARS Evaluation

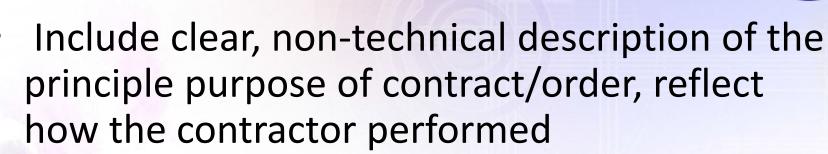


- Must include detailed and complete information about the contractor's performance
- Data must be objective or measureable
- Supportable by contract/order
- Performance expectations to be evaluated should be addressed at the initial post-award meeting (Gov't/Ktr)
- Shared with the COR
- Definitions of each rating and contents of the narrative to justify rating





CPARS Evaluation



- Tailored to type, size, content, and complexity
- Clear relevant information that accurately depicts the contractor's performance
- Based on objective facts supported by program and contract/order performance data
- Summary data can be used



CPARS Subcontractor Evaluation

- Evaluations are not completed on Subcontractors;
- However, evaluation of a Contractor's performance should include information on the prime contractor's ability to manage subcontractor efforts, including when applicable:
 - Small Business Subcontracting Program FAR 42.1502
 - Goals identified in the Small Business Subcontracting Plan when the contract includes FAR clause: 52.219-9



NEW Merged CPARS/PPIRS Application Published July 15, 2018!



- Government access is restricted to those individuals who are working on source selections, to include contractor responsibility determinations.
- Contractors may view only their own data. A contractor must be registered in the "System for Award Management" (SAM) system and must have created a Marketing Partner Identification Number (MPIN) in the SAM profile to access their PPIRS information.
- All PPI is treated as "For Official Use Only/Source Selection Information IAW FAR 2.101, 3.104 and 42.1503"



NEW Merged CPARS/PPIRS Application Published July 15, 2018!



All data in PPIRS is classified as **Source Selection Sensitive** and is not releasable unless directed by the agency who submitted the data. This policy is in accordance with FAR 42.1503(4)(d).

https://www.cpars.gov/videos/Tutorial/Release_v 6.0.0/Release_v_6.0.0.html

ALL users will be required to reset their password using the Forgot/Reset Password link the FIRST time logging in after July 15th, 2018







Support Best Value Source Selection Decisions
 Awards for Proven Performers (FAR 15)

- Provide Up-To-Date Documentation of Contractor's
 Ability to Meet Requirements (FAR 42)
- Motivate Improved Performance
- Facilitate Government Contractor Communication
- Determine Prospective Contractor Responsibility



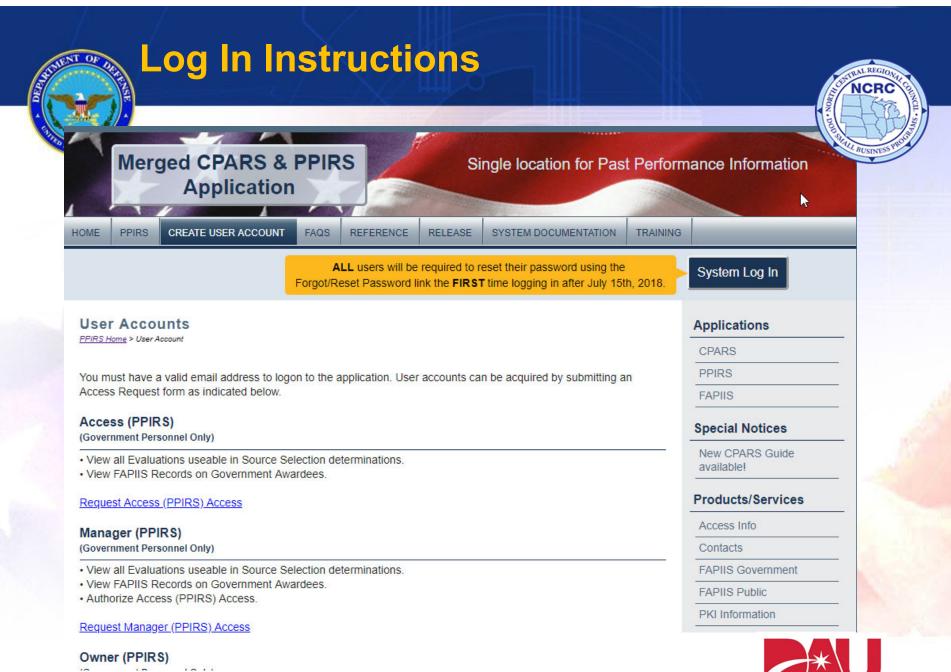


DFAR Reporting Thresholds



Business Sector	Dollar Threshold
Systems (includes new development and major modifications)	> \$5,000,000
Non-Systems	
- Operations Support	> \$5,000,000
- Services	> \$1,000,000
- Information Technology	> \$1,000,000
- Ship Repair & Overhaul	> \$500,000
Architect-Engineer	> \$35,000 All Terminations for Default
Construction	> \$700,000 All Terminations for Default

Request Contractor Account	CONTRAL REGIONAL
A DECEMBENT A	Received a state of the state o
REQUEST CONTRACTOR USER ACCOUNT You must be a Awardee/Contractor to be granted access to this part of the application. You will not be granted full access to its features until this has been confirmed. Help * Indicates Required Information	
Name * First Name: Minnie Middle Name: * Last Name: Mouse	
Title: * Email Address: Minnie.Mouse@gmail.com * Commercial Voice:	
Commercial FAX: DUNS and MPIN * DUNS: Add DUNS	
Add DUNS DUNS MPIN 999999991	Enter MPIN
Define Your UserId/Password User Id may be 5-30 characters (letters and numbers only).	 Click Save DUNS
Passwords must meet the following specifications: 1 must be 15-20 characters 2 must contain at least two upper and two lower case letters 3 must contain at least two numbers 4 must contain at least two special characters 5 cannot reuse your last 10 passwords 6 must differ from previous password by at least four characters 7 must not contain personal information such as: 1	
REMEMBER YOUR USER ID AND PASSWORD. * User Id: * Password: * Confirm Password: Submit Cancel	Defense Acquisition University



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New evaluation area more comprehensive assessment of contractor's utilization of SB – rather than just the achievement of goals

- Meets the past performance evaluation requirements included in FAR 42.15 and 19.7 and DFARS 215.305
- Assesses compliance with terms and conditions of the contract for Small Business participation
- Assesses compliance with FAR 52.219-8 & 52.219-9
- Assesses compliance w/individual subcontracting plans







•A3.24 Small Business Subcontracting. Answer the following questions:

- Does this contract include a subcontracting plan?
- Date of last Individual Subcontracting Report (ISR) /
- Summary Subcontracting Report (SSR)

Paragraph A3.31 and subparagraphs have been updated to change "Small Business Utilization" to "Small Business Subcontracting".

Small Business Utilization is used as rating language.



CPARS UPDATES SMALL BUSINESS Updated: July 15th 2018



2.12 Subcontractor Evaluations, Guide Page 9 •CPARs evaluations are not completed for subcontractors.

 CPAR evaluation of a contractor's performance should include information on the ability of a prime contractor to manage and coordinate subcontractor efforts Compliance with statutory requirements of the Small **Business Subcontracting Program. According to FAR** 42.1502, past performance evaluations shall include an assessment of contractor performance against, and efforts to achieve, the goals identified in the small business subcontracting plan when the contract includes the clause at 52.219-9, Small Business **Subcontracting Plan.**





A3.24 Small Business Subcontracting. Answer the following questions:

- Does this contract include a subcontracting plan?
- Date of last Individual Subcontracting Report (ISR)

/ Summary Subcontracting Report (SSR)





A3.30.2 Subcontract Management. Assess the contractor's success with timely award and management of subcontracts.

- Assess the prime contractor's effort devoted to managing subcontracts and whether subcontractors were an integral part of the contractor's team.
- Consider efforts taken to ensure early identification of subcontract problems and the timely application of corporate resources to preclude subcontract problems from impacting overall prime contractor performance.







A3.30.2 Subcontract Management (CON'T)

- Consider efforts taken to ensure prompt subcontractor payment
- Assess the prime contractor's managing of subcontractors to ensure compliance with labor and safety standards at the subcontract level
- If the contract is set aside for small business, assess the contractor's compliance with any limitations on subcontracting



CPARS SMALL BUSINESS SUBCONTRACTING



A3.31 Small Business Subcontracting. FAR Subpart 19.7 and 15 U.S.C. 637 contains statutory requirements for complying with the Small Business Subcontracting Program. Assess whether the contractor provided maximum practicable opportunity for Small **Business (including Alaska Native Corporations (ANCs)** and Indian Tribes) (including Small Disadvantaged **Businesses (which also includes ANCs and Indian** Tribes), Women Owned Small Businesses, HUBZone, Veteran Owned, Service Disabled Veteran Owned Small **Business, and ANCs and Indian Tribes that are not Small Disadvantaged Businesses or Small Businesses) to** participate in contract/order performance consistent with efficient performance of the contract/order.

CPARS SMALL BUSINESS SUBCONTRACTING



A3.31.1 Assess compliance with all terms and conditions in the contract/order relating to Small Business participation (including FAR 52.219-8, Utilization of Small Businesses and FAR 52.219-9, Small Business Subcontracting Plan (when required).

Assess any Attachment 3 Instructions for Completing a CPAR <u>A3-16</u> small business participation goals which are stated separately in the contract/order.

Assess achievement on each individual goal stated within the contract/order or subcontracting plan including good faith effort if the goal was not achieved.

CPARS - COMPREHENSIVE SMALL BUSINESS SUBCONTRACTING



<u>A3.31.2</u> It may be necessary to seek input from the Small Business specialist or Contracting Officer in regards to the contractor's compliance with these criteria. For DoD in cases where the contractor has a comprehensive subcontracting plan, request DCMA Comprehensive Subcontracting Plan Manager to provide input including any program specific performance information.



CPARS - COMMERCIAL SMALL BUSINESS SUBCONTRACTING



<u>A3.31.3</u> For contracts/orders subject to a commercial subcontracting plan, the Small Business Subcontracting factor should be rated "satisfactory" as long as an approved plan remains in place, unless liquidated damages have been assessed by the contracting officer who approved the commercial plan (see FAR 19.705-7(h)). In such case, the Small Business Subcontracting area must be rated "unsatisfactory".



CPARS – Commercial Subcontracting Plans



For contracts subject to a commercial subcontracting plan:

the Utilization of Small Business factor should be rated "green" as long as an approved plan remains in place unless liquidated damages have been assessed by the contracting officer who approved the commercial plan In such case, the Utilization of Small Business area must be rated "red".

This area must be rated for all contracts and task orders that contain a small business subcontracting goal.







A3.30.4 This area must be rated for all contracts and task orders that contain a small business subcontracting goal. A3.31.5 Ratings will be in accordance with definitions described in Attachment 2, "Evaluation **Ratings Definitions For The Small Business Evaluation Factor when 52.219-9 is used.** A3.31.6 Evaluations of the small business subcontracting are required for contracts and orders placed against basic ordering agreement (BOA), blanket purchase agreement (BPA), or GWAC/MAC if a subcontracting plan is required.







Evaluations of small business subcontracting for single-agency task orders and delivery orders are required when the contracting officer determines, in accordance with FAR Subpart 42.1502(d), it is more appropriate to complete a CPAR on each task/delivery order rather than completing a consolidated CPAR for the indefinite delivery contract and each exercised option year period. Execution of any subcontracting plan may be addressed in the narrative section for the Assessing Official.







Although FAR 19.705-2(e) states a contract may have no more than one subcontracting plan, performance against small business subcontracting may be more appropriately managed through individual task orders to achieve overall contract small business subcontracting goals as indicated in preceding paragraph.







Although paragraph 2.1.1 requires a CPAR to be completed for each order placed against multiagency indefinite delivery vehicle (IDV), the small business subcontracting assessment must completed by the agency that awarded the contract unless the contract ordering instructions allow for separate small business subcontracting goals to be incorporated into each order.. Multi-agency IDVs include federal Supply Schedules (FSS), Government Wide Acquisition Contracts (GWAC), and Multiple Agency Contracts (MAC).





2.4 Joint Ventures (FAR 4.102)

CPARs should be prepared on contracts/orders for joint ventures. When a joint venture is formed, a unique DUNS number is used which is different from those of the individual companies that formed the joint venture. A single CPAR will be prepared for the joint venture using that DUNS. If there is a teaming arrangement on a contract where a specific joint venture is not formed, the CPAR is only prepared on the specific prime contractor identified on the contract. All other team members are considered subcontractors to the prime contractor. See Section 2.10 to address subcontractor performance.



- •As stated in FAR 9.6, Contractor Team Arrangement is an arrangement in which
 - (1) two or more companies form a partnership or joint venture to act as a potential prime contractor; or
 - (2) a potential prime contractor agrees with one or more other companies to have them act as its subcontractors under a specified Government contract or acquisition program.
- •When evaluating CTAs for orders placed against Federal Supply Schedules (FSS), evaluate the team member with most of the revenue.



A3.24 Small Business Subcontracting. Answer the following questions:

- Does this contract include a subcontracting plan?
- Date of last Individual Subcontracting Report (ISR) / Summary Subcontracting Report (SSR)





CPARS Benefits

✓ Support best-value source selection decisions ✓ Provide up-to-date documentation of a contractor's ability to meet contract requirements Motivate improved performance ✓ Facilitate Governmentcontractor communications



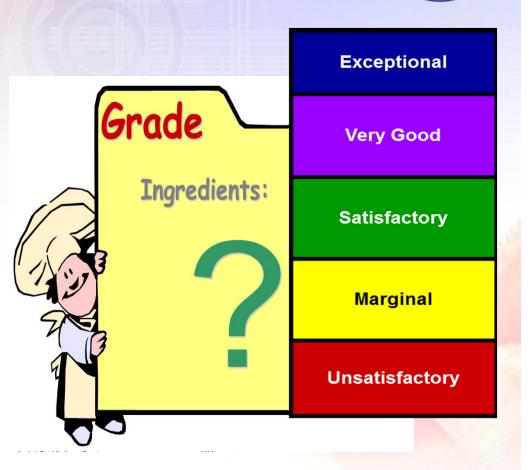


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PERFORMANCE

CPARS Small Business Entry

What information would you expect to find in a CPARS small business entry?



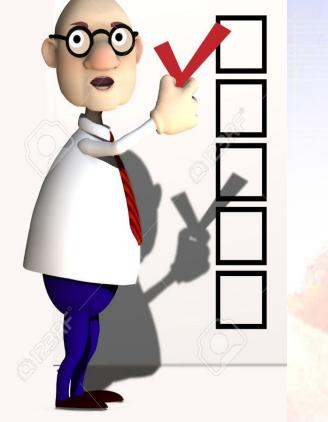




Elements Evaluated

Quality Schedule Cost Control Management Small Business Regulatory Complian Other Areas









REVIEWING CPAR ENTRIES

- Was the contractor in compliance with the small business subcontracting requirements of the contract (subcontracting plans and binding SBPCDs)?
- Does the narrative provide adequate supporting information?
- Does the CPARS Small Business Utilization rating appear justified?
- Was any information missing?





Narratives are the Most Important Part of the CPAR!





Rating Areas



Small Business Subcontracting

 Compliance with Terms and Conditions for Small Business
 Participation



- ✓ Achievement of Small Business
 Subcontracting Goals
- ✓ Good Faith Effort to Meet Small Business Subcontracting Goals



CPARS Small Business Utilization Tab



CPARS - Systems

Contract/Schedule Number: N0001905G0008 2 Order Number: 0011 (Click on a tab below to view/enter the related information; fields identified with \ast are required)

Contractor Name/Address Contract Information Misc Information Small Business Utilization Ratings Ass

Small Business Utilization 김

Does this contract include a subcontracting plan? (Select)

Is small business subcontracting under this contract included in a comprehensive small business subcontracting plan? N/A 😪

Is small business subcontracting under this contract included in a commercial small business subcontracting plan? N/A

Date of last Individual Subcontracting Report (ISR) / Summary Subcontracting Report (SSR): N/A

Should be "Yes"

Yes, No, or N/A

Yes, No, or N/A

Contract Complete, N/A, or Bi-Annual date (Provided by the eSRS)

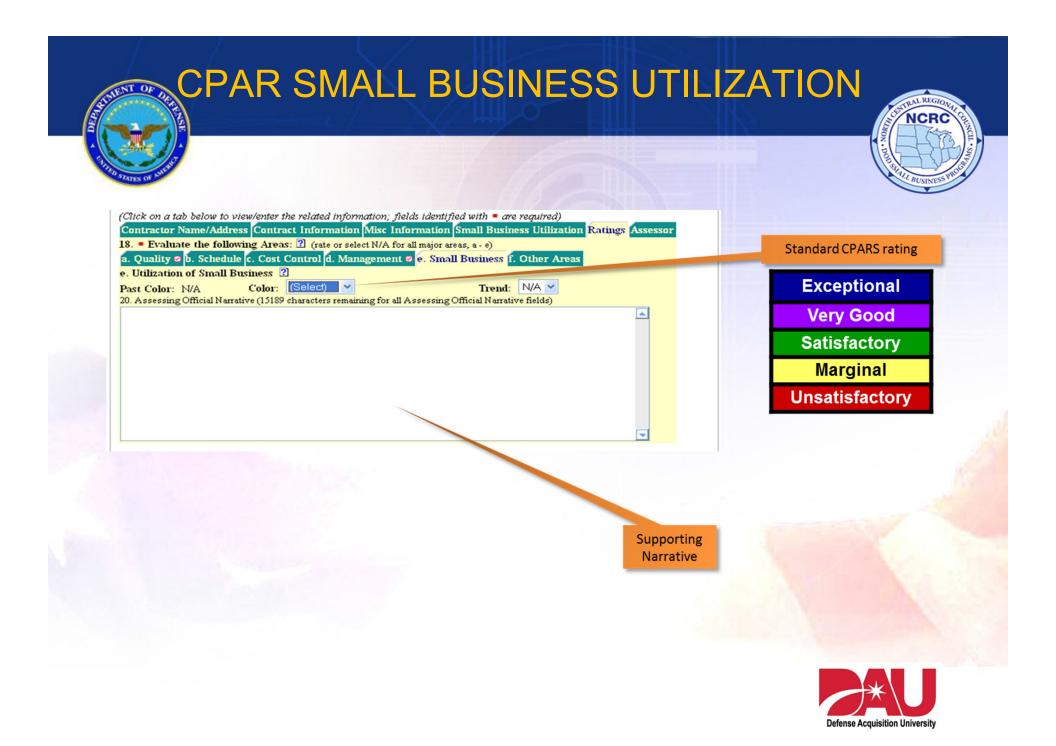




CPARS SYSTEM



CPARS - Systems	
Contract/Schedule Number: N0001905G0008 ? Order Number: 0011	
(Click on a tab below to view/enter the related information; fields identified with $*$ are required)	Yes or No
Contractor Name/Address Contract Information Misc Information Small Business Utilization Rative concessor	
Small Business Utilization ?	
■ Does this contract include a subcontracting plan? (Select)	Yes, No or N/A
Is small business subcontracting under this contract included in a comprehensive small business subcontracting plan? N/A	
Is small business subcontracting under this contract included in a commercial small business subcontracting plan? N/A 🛰	
Date of last Individual Subcontracting Report (ISR) / Summary Subcontracting Report (SSR): N/A	Yes, No or N/A
(Click on a tab below to view/enter the related information; fields identified with = are required)	
Contractor Name/Address Contract Information Misc Information Small Business Utilization Ratings Assessor	
18. ■ Evaluate the following Areas: ? (rate or select N/A for all major areas, a - e) a. Quality Ø b. Schedule c. Cost Control d. Management Ø e. Small Business f. Other Areas	ract Complete
e. Utilization of Small Business 2	ract complete
	nual date-Mar or Sep
20 A specsing Official Narrative (15129 characters remaining for all A specsing Official Narrative fields)	information comes
	the eSRS)
Standard CDAD acting	
Standard CPAR rating	
(required when answering "Yes" to Does this contract include a	
subcontracting plan?)	
	*
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CPAR NARRATIVE



- The rating given for CPARS Small Business Utilization should be supported by the narrative statement. This is a critical element of the CPARS entry because it provides the justification for the rating, and also provides details on small business subcontracting plan compliance.
- This statement supports the Exceptional rating because it addresses:
 - ✓ Quantifiable Accomplishments
 - Comparison to the Small Business Subcontracting Plan Goals
 - ✓ Type of Work Performed by SB
 - ✓ Timely eSRS reporting





CPAR RATINGS



	Rating	Subcontracting Plan	ISR/SSR	Benefits/Impacts
	Exceptional	Exceeded all statutory goals or goals as negotiated	Accurate and Timely	Multiple Significant Events of Benefit
	Very Good	Met All Statutory goals or goals as negotiated	Accurate and Timely	Significant Event of Benefit
	Satisfactory	Good-Faith Effort To all negotiated subcontract goals in the various socioeconomic category	Accurate and Timely	Minor Problems or Major Problems with Corrective Action addressed or taken
	Marginal	Deficient in Meeting Key Plan Elements	Inaccurate; Untimely	Corrective Action Plan Required and identify the significant event and how it impacted SB utilization
	Unsatisfactory	Noncompliant; Uncooperative	Inaccurate; Untimely	Multiple Significant Problems; Liquidated Damages

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- Ratings are same as other areas assessed but definitions of ratings differ
- Dark Blue/Exceptional

CPAR RATINGS

- Purple/Very Good
- Green/Satisfactory
- Yellow/Marginal
- Red/Unsatisfactory
- SB Utilization also added to ACASS and CCASS
- For CPARS guide and other information go to: http://www.cpars.csd.disa.mil/cparsmain.htm





Statements to Avoid **Outside Contract Scope** In Our Opinion **O** It Appeared **O** We Believe **We Hope We Were Not Happy O** We Did Not Like **O** We Think **Ol know this company** personally





Small Business Subcontracting

- Evaluate When Subcontracting Plan is Required
 - •Contracts
 - •Orders Against BOAs, BPAs, GWACs, MACs

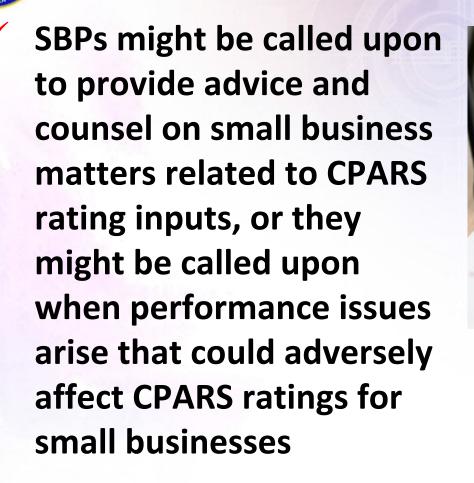
•Single-Agency Task/Delivery Order When Contracting Officer Determines Appropriate

•For Multi-Agency Indefinite Delivery Vehicles, Evaluated by Agency that Awarded Contract Unless Separate Small Business Subcontracting Goals in Each Order

Includes FSS, GWACs, MACs



NCRC Activity: Let's Analyze a CPARS Entry







Sample Contract Subcontractor Evaluation in CPARS



Small Business Subcontracting – Rating: Exceptional The contractor provides maintenance and support on IT. They tried to get a few subcontractors on this project and honestly, they did the best they could.

> Narrative Sufficient? Yes or No



Sample Subcontractor Contract Evaluation



NOT Sufficient

Small Business Subcontracting – Rating: Exceptional The contractor provides maintenance and support on IT. They tried to get a few subcontractors on this project and honestly, they did the best they could.

Missing:

- Quantifiable Accomplishments
- Comparison to Plan Goals
- Type of Work Performed by Small Business Delete:
- Personal opinions/bias







Sample CPAR Narrative Element Evaluated: Small Busines Subcontracting



Small Business Subcontracting – Rating: Exceptional

The Contractor exceeded their 27% small business goal by 2 percentage points and met all of the other subcontracting goals. The Contractor awarded a subcontract to a small business for mission critical information technology for this program. The Contractor conducted three outreach events which directly led to award of subcontracts to Service Disabled Veteran Owned small businesses and HUBZone small businesses. The Contractor exceeded the small business participation requirements of the contract that required the small business to be used for 25% of the R&D portion of the contract, by awarding 50% of this requirement to small business. The Contractor submitted all required reports on time.

Narrative Sufficient? Yes or No



Sample CPAR Narrative Element Evaluated: Small Business Subcontracting



Small Business Subcontracting – Rating: Exceptional

The Contractor exceeded their 27% small business goal by 2 percentage points and met all of the other subcontracting goals. The Contractor awarded a subcontract to a small business for mission critical information technology for this program. The Contractor conducted three outreach events which directly led to award of subcontracts to Service Disabled Veteran Owned small businesses and HUBZone small businesses. The Contractor exceeded the small business participation requirements of the contract that required the small business to be used for 25% of the R&D portion of the contract, by awarding 50% of this requirement to small business. The Contractor submitted all required reports on time.

Contains:

- Quantifiable Accomplishments
- Comparison to Plan Goals
- Type of Work Performed by Small Business





SUMMARY



- 1. CPARS Guide updated July 2018
- 2. Small Business has been changed from: Small Business Utilization to Small Business Subcontracting except rating language.
- 3. Small Business Participation is assessed in CPARS
- 4. Small Business Professionals Should know how to assess/review CPARS entries for accuracy regarding to small business participation:
 - Quantifiable Accomplishments
 - Comparison to Plan Goals
 - Type of Work Performed by Small Business
- 5. Reach out to Contracting Officers/Program Managers to review Small Business CPAR Info





Robinson, Jeanette (2017-18) CPARS Workshops and Briefings, DAU Small Business Programs CPARS Website: https://www.cpars.gov Federal Acquisition Regulation Defense Acquisition University <u>http://www.dau.mil</u>







Questions? Contact Info

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BACK UP SLIDES