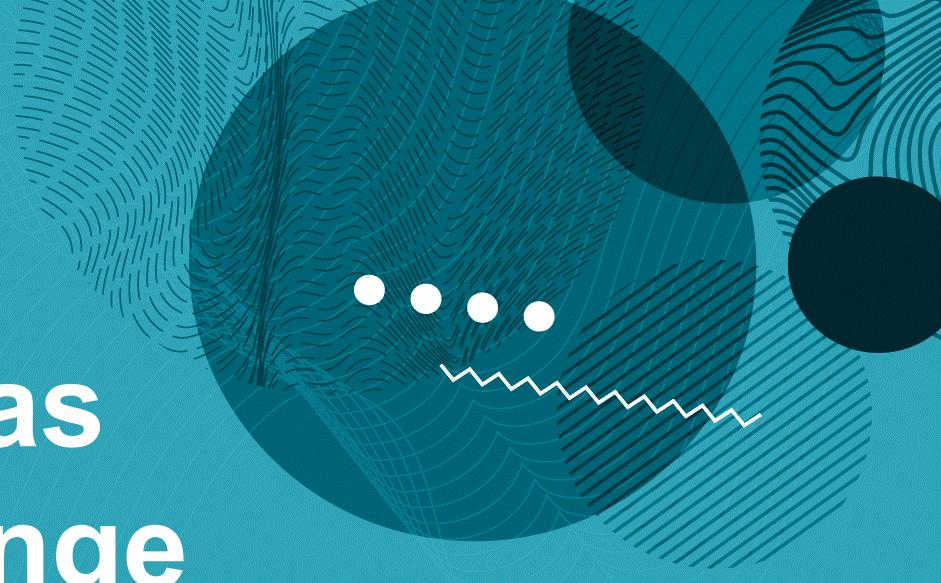




CPARS: Time Has Come for a Change

... Part 2

6 December 2022





Poll Questions

Do you feel CPARS are applied consistently

- Yes
- No

SURVEY SAYS



95% NO - Do you feel CPARS are applied consistently within an Agency?



96% NO - Do you feel CPARS are applied consistently between Agencies?



54% YES - Do you collaborate closely with the agency on your CPARS?

CPARS Reform?

Discussion:

The IGE Team identified five focus areas to review:

1. Drive for **consistency** within an Agency and across all Agencies
2. Drive for **incorporation** of CPARS rating [sub]factors definitions and understanding into **Partnering** (written into Partnering and "Kickoff" documents/direction) with periodic follow up
3. Support a **dispute resolution** process for low ratings prior to recording in CPARS.
4. Drive for **correlation** between meaning of CPARS ratings given for a project/contract and interpretation by **future source selection boards**.
5. Promulgate and support CPARS **training** for contractor.

Recommendation:

Have IGE address following; report back at JETC 2022:

1. Liaison with GSA regarding development of CPARS modules on Construction and Architectural Services that provide more consistent rigor and detail in the rating process (similar to the rigor of the old CCASS and ACASS). If GSA is not amenable to a change, **develop tri-service (DCAs) sub-factors for consistent application for construction and AE contracts**.
2. **Incorporate CPARS rating [sub]factors definitions and understanding into the DCA's Partnering Directives**
3. **Develop a plan to promulgate and support CPARS training for all contractors via Society/Association educational forums, DCA outreach and other vehicles.**



CPARS Consistency

Evaluation Areas	Past Rating	Rating
Quality:	N/A	Exceptional
Schedule:	N/A	Exceptional
Cost Control:	N/A	Exceptional
Management:	N/A	Exceptional
Small Business Subcontracting:	N/A	Exceptional
Regulatory Compliance:	N/A	Exceptional
Other Areas:		

Quality

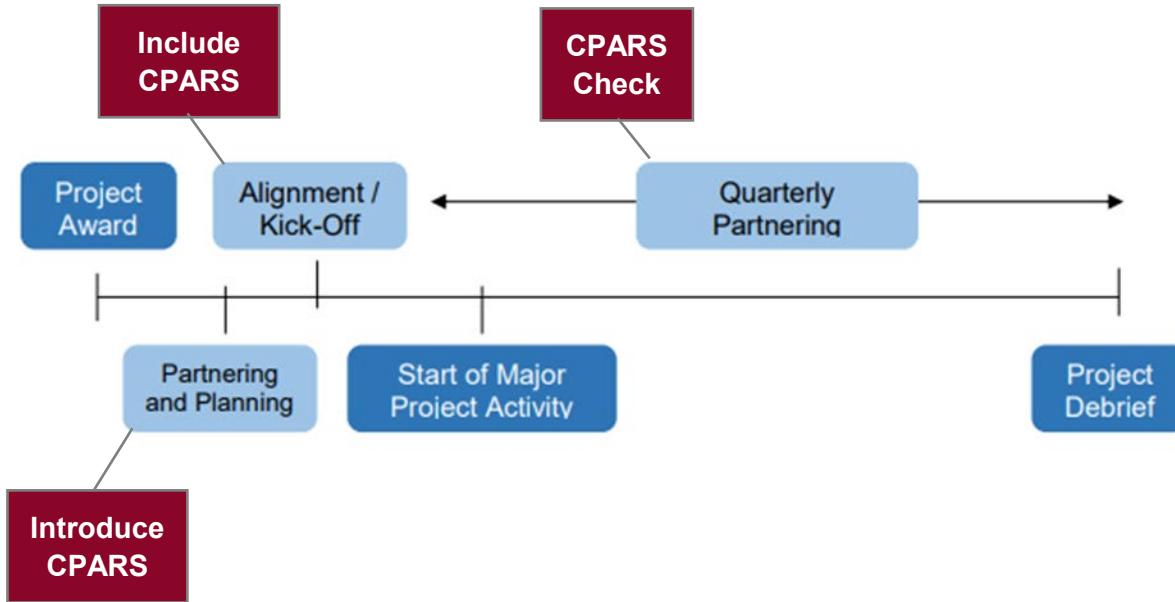
FOR OFFICIAL USE ONLY (WHEN COMPLETED)						
PART III EVALUATION OF PERFORMANCE ELEMENTS						
N/A = NOT APPLICABLE O = OUTSTANDING A = ABOVE AVERAGE S = SATISFACTORY M = MARGINAL U = UNSATISFACTORY						
15. QUALITY CONTROL	N/A	O	A	S	M	U
a. QUALITY OF WORKMANSHIP						
b. ADEQUACY OF THE COQC PLAN						
c. IMPLEMENTATION OF THE COQC PLAN						
d. QUALITY OF QC DOCUMENTATION						
e. STORAGE OF MATERIALS						
f. ADEQUACY OF MATERIALS						
g. ADEQUACY OF SUBMITTALS						
h. ADEQUACY OF QC TESTING						
i. ADEQUACY OF AS-BUILTS						
j. USE OF SPECIFIED MATERIALS						
k. IDENTIFICATION/CORRECTION OF DEFICIENT WORK IN A TIMELY MANNER						
17. TIMELY PERFORMANCE						
a. ADEQUACY OF INITIAL PROGRESS SCHEDULE						
b. ADHERENCE TO APPROVED SCHEDULE						
c. RESOLUTION OF DELAYS						
d. SUBMISSION OF REQUIRED DOCUMENTATION						
e. COMPLETION OF PUNCHLIST ITEMS						
f. SUBMISSION OF UPDATED AND REVISED PROGRESS SCHEDULES						
g. WARRANTY RESPONSE						
28. REMARKS (Explanation of unsatisfactory evaluation or actions to justify the evaluation. These data must be retained by the Government for audit purposes. Continue on separate sheet(s), if necessary.)						

15. QUALITY CONTROL	N/A	O	A	S	M	U
a. QUALITY OF WORKMANSHIP						
b. ADEQUACY OF THE COQC PLAN						
c. IMPLEMENTATION OF THE COQC PLAN						
d. QUALITY OF QC DOCUMENTATION						
e. STORAGE OF MATERIALS						
f. ADEQUACY OF MATERIALS						
g. ADEQUACY OF SUBMITTALS						
h. ADEQUACY OF QC TESTING						
i. ADEQUACY OF AS-BUILTS						
j. USE OF SPECIFIED MATERIALS						
k. IDENTIFICATION/CORRECTION OF DEFICIENT WORK IN A TIMELY MANNER						

TYPICAL USAGE CONTRACTOR PERFORMANCE EVALUATION STANDARDS & WORKSHEET						
Outstanding	Above Average	Satisfactory	Marginally	Unsatisfactory		
a. [] Quality of workmanship. Inspectors/testers indicate all work is performed in accordance with the contract, specification, and Government prompting.	[] Work is kept in accordance with plans and spec with minimal number of take-backs and rework.	[] Rework is frequently necessary and affects other phases of work.				
b. [] Adequacy of COQC plan. Meets all Government requirements in accordance with the contract, specification, and Government prompting.	[] COQC plan was sufficiently detailed to meet the contract, required minimum revisions and implementation.	[] COQC plan is incomplete, requires frequent revisions, and not submitted timely.				
c. [] Implementation of COQC Plan. Applies 3-Phase control system, minimum 10% of work, and no Government prompting.	[] Applies 3-Phase control system per contract specifications, with little Government prompting.	[] QC documentation is accurate, timely and complete for all operations.				
d. [] Quality of QC documentation. Verifies materials are in accordance with the contract and complete for all operations.	[] All materials stored as required by contract and in accordance with little Government prompting.	[] All materials stored as required by contract and in accordance with little Government prompting.				
e. [] Adequacy of materials. Without Government prompting verifies materials compliance before use.	[] Verifies materials are in compliance before incorporation with little Government prompting.	[] Submits frequently requested or denied materials.				
f. [] Adequacy of submittals. 90% of submittals are submitted in accordance with the contract and Alston Codes (A or B) or are always submitted in accordance with the contract.	[] Ninety percent or more of submittals are submitted in accordance with the contract and Alston Codes (A or B) or are always submitted in accordance with the contract.	[] Submits frequently requested or denied materials.				
g. [] Adequacy of QC testing. Does not have to be reminded to perform testing as specified in the contract.	[] QC testing is performed as specified in the contract.	[] Rework has to be remedied to perform testing as specified in the contract.				
h. [] Adequacy of as-builts. Kept updated and regularly reviewed for completeness and in accordance with the contract.	[] As-builts are kept updated and available for review by Government.	[] As-builts are not kept updated and/or not available for review by Government.				
i. [] Use of specified materials. Used and in accordance with the contract.	[] Reworks materials not in accordance with the contract.	[] Remediates frequently requested or denied materials.				
j. [] Identification/correction of deficient work in a timely manner. Remediates work with minimal deficiences without prompting.	[] Instantly identifies, tracks, and corrects deficiences with minimal Government prompting.	[] Instantly identifies, tracks, and corrects deficiences with minimal Government prompting.				
SUMMARY: [] OUTSTANDING [] SATISFACTORY [] UNSATISFACTORY						



How to incorporate CPARS into Partnering?



Training and Understanding Recommendations

1. Gov't to implement consistency across agency websites for CPARS references.
 - Include a link that directs to CPARS.gov training site
2. Gov't to develop more/better training for rating officials (housed with other training on CPARS.gov website)
 - Training exists for how to enter ratings into CPARS.gov, but now how or what criteria to use to evaluate the contractor
 - (Engage IGE to help promote)
3. IGE to seek training opportunities at professional organizations/associations.
 - Examples: COAA, DBIA, SAME, ACEC, AGC, AIA, CMAA
4. Gov't to stress importance of robust, on-time reviews to lessen 'overdue' CPARS.
 - Overdue CPARS tend to affect the integrity of the ratings/narrative (i.e., Gov't staff turnover, contractor performance not tracked)

Subfactors: Quality

AE

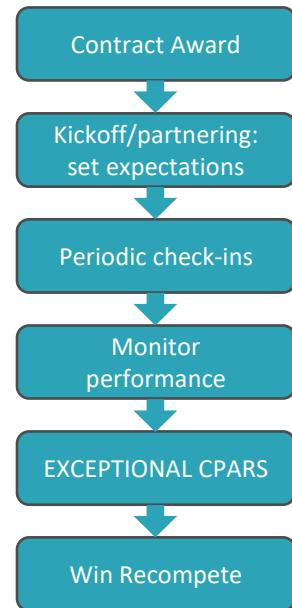
1.1	Ability to maintain quality control and effectiveness of Design Quality Control (DQC) Plan
1.2	Clarity of submittal documents within expectations of industry practice and level of care
1.3	Adequacy of site investigations
1.4	Adherence to scope, criteria, constructability & regional/local practicality to expected levels in each milestone submission
1.5	Coordination between the drawings and specifications (free of significant conflict) and compliance with the design criteria; contract documents present a clear, constructable solution
1.6	Cost estimate complete and coordinated across disciplines, users, and owners/stakeholders
1.7	(If required) Independent technical review completed and incorporated into contract drawings and specifications where appropriate
1.8	Design to cost requirement met; value engineering conducted where required; bid options identified where appropriate
1.9	Post Award Construction Phase Services - Responsiveness in providing technical assistance as required by the contract

Construction

1.1	Quality of Workmanship
1.2	QC Plan Documentation and Implementation
1.3	Work is in accordance with the plans and specifications
1.4	Adequacy, Use and Storage of Materials
1.5	Adequacy and Timeliness of Submittals
1.6	Implementation of 3-phase inspection process and QC testing
1.7	Adequacy and Timeliness of As-Builts
1.8	Timeliness in Completion of Deficient Work
1.9	Timeliness in Completion of Punchlist and/or Warranty Work

CPARS Best Practices

1. Lay the foundation at contract award and follow through with exceptional performance.
2. Understand the Gov't's expectations at kickoff and what it will take to get exceptional ratings. By simply having open communications with the Gov't, you can be involved throughout the entire process and help set the stage for higher performance ratings.
3. Hold periodic performance check-ins with the Gov't to ensure both the Gov't and the Contractor are in agreement towards successful project completion. Ensure that the work being performed is meeting or exceeding the Gov't's expectations. (See FAR Table 42-1 for definitions.)
4. Develop CPAR input throughout the period of performance. The Gov't may only remember the last few months of work, which could negatively affect the CPAR for the entire period of performance.
5. Consider including a CPARS checklist or self-evaluation as part of the regular check-in procedure to proactively track project success.
 - It is recommended to use the CPAR format to build your self-evaluation and complete each applicable evaluation area in detailed paragraphs not bullets. (Blank areas or minimal information could cost you a good rating in those areas.)
 - Include recommended ratings of your performance based on the FAR definitions with supporting details showing key examples of how your performance met or exceeded the requirements and the resulting benefit to the Gov't.



Don't let CPARS become an afterthought.

Resources

- **FAR Subpart 42.15**

<https://www.acquisition.gov/far/subpart-42.15>

- **CPARS Guidance**

<https://www.cpars.gov/pdfs/CPARS-Guidance.pdf>

- **CPARS Training**

https://www.cpars.gov/lc_function.htm

What is included here?



Performance evaluations contain both government and contractor comments to provide a balanced view of performance, allowing source selection officials to look beyond contractor references.

Integrity records contain: federal contractor criminal, civil, and administrative proceedings in connection with federal awards; suspensions and debarments; administrative agreements issued in lieu of suspension or debarment; non-responsibility determinations; terminations for cause or default; defective pricing determinations; termination for material failure to comply; subcontractor payment issues; information on trafficking in persons; and recipient not qualified determinations.