



CPARS: Time Has Come for a Change ... Part 2

6 December 2022



Poll Questions

Do you feel CPARS are applied consistently

- Yes
- No



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:		

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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	16. EFFECTIVENESS OF MANAGEMENT STANDARDS	N/A	O	A	S	M	U
a. QUALITY OF WORKMANSHIP							a. COOPERATION AND RESPONSIVENESS						
b. ADEQUACY OF THE CQC PLAN							b. MANAGEMENT OF RESOURCES/ PERSONNEL						
c. IMPLEMENTATION OF THE CQC PLAN							c. COORDINATION AND CONTROL OF SUBCONTRACTOR(S)						
d. QUALITY OF QC DOCUMENTATION							d. ADEQUACY OF SITE CLEAN-UP						
e. STORAGE OF MATERIALS							e. EFFECTIVENESS OF JOB-SITE SUPERVISION						
f. ADEQUACY OF MATERIALS							f. COMPLIANCE WITH LAWS AND REGULATIONS						
g. ADEQUACY OF QC TESTING							g. PROFESSIONAL CONDUCT						
h. ADEQUACY OF AS-BUILTS							h. REVIEW/RESOLUTION OF SUBCONTRACTOR'S ISSUES						
i. USE OF SPECIFIED MATERIALS							i. IMPLEMENTATION OF SUBCONTRACTING PLAN						
j. IDENTIFICATION/CORRECTION OF DEFICIENT WORK IN A TIMELY MANNER													
17. TIMELY PERFORMANCE							18. COMPLIANCE WITH LABOR STANDARDS						
a. ADEQUACY OF INITIAL PROGRESS SCHEDULE							a. CORRECTION OF NOTED DEFICIENCIES						
b. ADHERENCE TO APPROVED SCHEDULE							b. PAYROLLS PROPERLY COMPLETED AND SUBMITTED						
c. RESOLUTION OF DELAYS							c. COMPLIANCE WITH LABOR LAWS AND REGULATIONS WITH SPECIFIC ATTENTION TO THE DAVIS-BACON ACT AND REQ REQUIREMENTS						
d. SUBMISSION OF REQUIRED DOCUMENTATION							19. COMPLIANCE WITH SAFETY STANDARDS						
e. COMPLETION OF PUNCHLIST ITEMS													
f. SUBMISSION OF UPDATED AND REVISED PROGRESS SCHEDULES													
g. WARRANTY RESPONSE													
20. REMARKS (Explanation of unsatisfactory evaluation or actions to justify the evaluation. These data must be responsibility. Continue on separate sheet(s), if needed.)													

TYPICAL USAGE CONTRACTOR PERFORMANCE EVALUATION STANDARDS & WORKSHEET

15. QUALITY CONTROL

a. [] Quality of workmanship. Inspect/observers indicate all work is performed in accordance with plans and specs with minimal number of field tests and rework.

b. [] Adequacy of CQC Plan. Includes all QC and testing requirements in accordance with the contract and submitted timely.

c. [] Implementation of CQC Plan. All phases of work completed according to the contract specifications, with no Government prompting.

d. [] Quality of QC documentation. Very thorough, accurate, timely and complete for all operations.

e. [] Storage of materials. All materials stored as required by the contract with no Government prompting.

f. [] Adequacy of materials. Without Government prompting, sufficient materials compliance before use.

g. [] Adequacy of submittals. 90% or more of QA submittals receive Action Codes (A or S) & are always made on or before scheduled date.

h. [] Adequacy of QC testing. Does not have to be submitted to perform QC testing as specified in the contract.

i. [] Adequacy of As-Builts. Most updated and regularly reviewed for accuracy with Government personnel.

j. [] Use of specified materials. Materials are in accordance with the contract.

k. [] Identification/correction of deficient work in a timely manner. Deficiencies without prompting.

16. EFFECTIVENESS OF MANAGEMENT STANDARDS

a. [] Work is performed in accordance with plans and specs with minimal number of field tests and rework.

b. [] CQC plan was sufficiently complete, according to the contract, required revision submitted and submitted timely.

c. [] Apples 3-Phase control system, per contract specifications, with the Government prompting.

d. [] QC documentation is accurate, timely and complete for all operations.

e. [] All materials stored as required by the contract with the Government prompting.

f. [] Verifies materials are in compliance before incorporation with the Government prompting.

g. [] Nearly percent or more of submittals requiring Government approval receive Action Codes (A or S) and are generally made as scheduled.

h. [] Barriers have to be removed to perform testing as specified in the contract.

i. [] As-builts are kept updated and available for review by Government personnel.

j. [] Ready materials are in accordance with the contract.

k. [] Routinely identifies, tracks, and corrects deficiencies with minimal Government prompting.

17. TIMELY PERFORMANCE

a. [] Research is frequently necessary and affects other phases of work.

b. [] CQC plan is incomplete according to the contract, requires revision, and not submitted timely.

c. [] Doesn't apply 3-Phase control system as contract specifies & Government prompting.

d. [] QC documentation frequently requires more detail for completeness/accuracy. Reports not timely.

e. [] Government frequently requires instructions to store materials per contract and repeatedly requests corrections.

f. [] Frequently has to be reminded to check compliance of materials.

g. [] Submittals frequently require action or contractor's failure to identify variances and are later than scheduled.

h. [] Frequently has to be reminded to perform testing as specified in the contract.

i. [] As-builts are not kept updated and/or are not available for review by Government personnel.

j. [] Barriers frequently required for non-specified/non-imposed materials. Prompted often to use specified materials.

k. [] Government frequently points out deficiencies and has to remind contractor about corrections.

18. COMPLIANCE WITH LABOR STANDARDS

a. [] Correction of noted deficiencies.

b. [] Payrolls properly completed and submitted.

c. [] Compliance with labor laws and regulations with specific attention to the Davis-Bacon Act and REQ requirements.

19. COMPLIANCE WITH SAFETY STANDARDS

a. [] Correction of noted deficiencies.

b. [] Payrolls properly completed and submitted.

c. [] Compliance with labor laws and regulations with specific attention to the Davis-Bacon Act and REQ requirements.

20. REMARKS (Explanation of unsatisfactory evaluation or actions to justify the evaluation. These data must be responsibility. Continue on separate sheet(s), if needed.)

SUMMARY: [] OUTSTANDING [] SATISFACTORY [] MARGINAL [] UNSATISFACTORY

Quality



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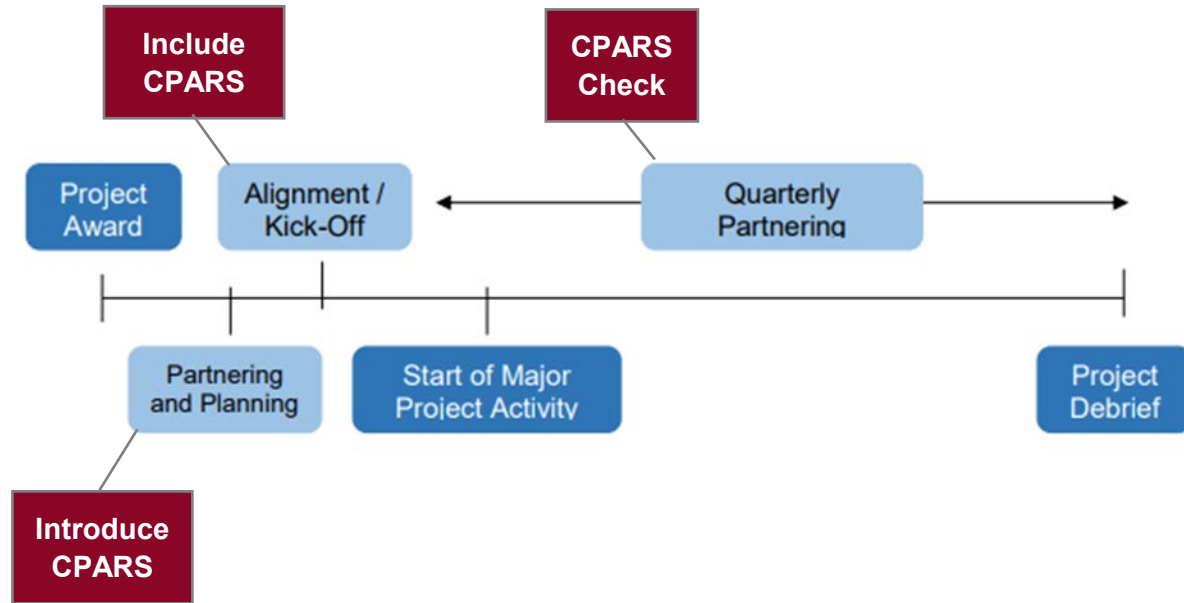
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How to incorporate CPARS into Partnering?



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)



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Subfactors: Quality

AE

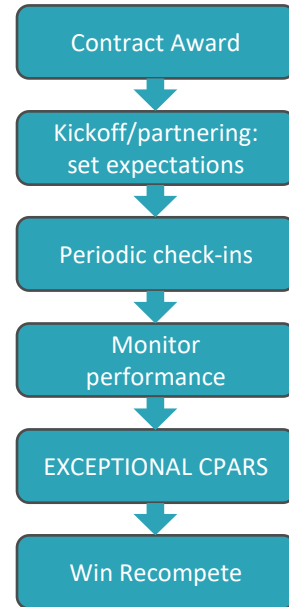
1.1	Ability to maintain quality control and effectiveness of Design Quality Control (DQC) Plan
1.2	Clarity of submittal documents within expectations of industry practice and level of care
1.3	Adequacy of site investigations
1.4	Adherence to scope, criteria, constructability & regional/local practicality 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-Built
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**

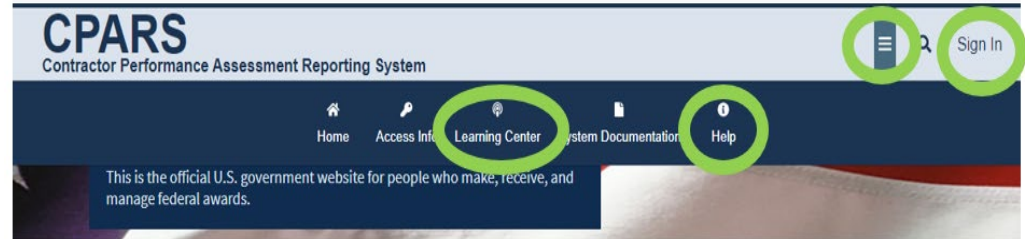
<https://www.acquisition.gov/far/subpart-42.15>

- **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.