

**Social Security Administration  
Service Contract Inventory (SCI)**

**FY 2012 SCI Analysis Report**

**FY 2013 SCI Analysis Plan**

## **FY 2012 SCI Analysis Report**

### **Background**

The Consolidated Appropriations Act, 2010, Public Law 111-117, requires civilian agencies to prepare an annual inventory of their service contracts and to analyze the inventory to determine if the mix of Federal employees and contractors is effective or if rebalancing is necessary. The Office of Management and Budget's (OMB) *Service Contract Inventories* memorandum dated December 19, 2011, provides guidance for developing the service contract inventory and analysis. As required, we completed our fiscal year (FY) 2012 analysis and posted it on our website at <http://www.ssa.gov/sci/>.

### **PSCs Selected for Review**

In compliance with OMB guidance, we selected for review the following product service codes (PSC) from the FY 2012 SCI.

PSC	FY 2012 Obligations	Number of Contracts
Q509 Medical – Internal Medicine	\$780,399	8
Q526 Medical – Medical/Psychiatric Consultation	\$43,131,285	608

### **Review Methodology**

SSA reviewed each of these contracts by surveying the contracting officer (COs) and contracting officer's representatives (CORs) assigned to the contract. The results of the survey, which we summarized below, indicate that SSA takes appropriate steps to guard against improper reliance or overreliance on contractors.

In accordance with OMB's guidance, our review covered the following six items to ensure:

1. Each personal service contract in the inventory has been entered into, and is being performed, in accordance with applicable laws and regulations;
2. The agency provides special management attention to functions closely associated with inherently governmental functions, in accordance with Federal Acquisition Regulations 37.114;
3. The agency is not using contractor personnel to perform inherently governmental functions;
4. The agency has specific safeguards in place to ensure that work performed by contractors has not changed or expanded during performance to become an inherently governmental function;

5. The agency 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; and
6. There are sufficient internal agency resources to manage and oversee contracts effectively.

To ensure compliance with the Consolidated Appropriations Act, 2010, our review also included the following questions:

- Has the function been performed by Federal employees in the last ten years?
- Did we award the contract on a non-competitive basis?
- Has the contractor performed poorly as determined by a contracting officer?
- Is this contract cost effective?

In addition, SSA follows the following practices.

- Prior to awarding contracts, the contracting office reviewed the requirements to ensure that unauthorized personal services contracts or inherently governmental functions were not included in the purchase request.
- SSA requires a certified COR to be identified and assigned to each contract. Throughout the life of the contract, the COR continually monitors and evaluates performance, ensuring both that the services are completed in accordance with the terms of the contract and that the performance of service does not put the government at risk of overreliance.

## **Summary of Findings**

### **Q509 Medical – Internal Medicine**

### **Q526 Medical – Medical/Psychiatric Consultation**

The chart below summarizes the input of the COs and CORs on each of the specific responsibilities outlined in section 743(e)(2), which lays out the specific areas agencies are to consider in conjunction with reviewing their service contract inventory

<b>§ 743(e) Review Responsibilities</b>	<b>SSA review results</b>
(i) Each contract in the inventory that is a personal services contract has been entered into, and is being performed, in accordance with applicable laws and regulations.	<i>None of the contracts include personal services.</i>
(ii) The agency is giving special management attention, as set forth in FAR 37.114, to functions that are closely associated with inherently governmental functions.	<i>None of the contractors are performing closely associated with inherently governmental functions.</i>
(iii) The agency is not using contractor employees	<i>Contractors are not performing inherently</i>

to perform inherently governmental functions.	<i>governmental functions.</i>
(iv) The agency 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.	<i>Each contract is assigned a certified COR, who continuously reviews and monitors contractor performance to ensure that mission creep does not occur.</i>
(v) The agency 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.	<i>While contractors do perform critical functions, SSA has concluded that it has sufficient internal expertise both to maintain control of its operations and to manage the contractors that are supporting the federal employees.</i>
(vi) There are sufficient internal agency resources to manage and oversee contracts effectively.	<i>SSA staff members have sufficient internal expertise of IT processes and software engineering to oversee and manage these contracts.</i>

### **Findings and Recommendations**

In light of these results, SSA determined no insourcing of work was necessary. SSA will continue to carefully manage and monitor its contracted work in accordance with law, regulation, and policy – including the new guidance set forth in OFPP Letter 11-01<sup>1</sup>, which addresses the performance and management of inherently governmental and critical functions – to maintain the right balance between federal employees and contractors.

### **Status of Previous Findings and Recommendations**

We have not identified the need for any actions in our previous reviews.

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<sup>1</sup> OFPP Policy Letter 11-01, Performance of Inherently Governmental and Critical Functions, is available at [http://www.whitehouse.gov/omb/procurement\\_index\\_work\\_performance/](http://www.whitehouse.gov/omb/procurement_index_work_performance/).

### **FY 2013 SCI Analysis Plan**

The Social Security Administration has selected the following PSCs from its FY 2013 Service Contract Inventory for analysis as required by Office of Management and Budget memorandum entitled Service Contract Inventories, dated December 19, 2011.

PSC	FY 2013 Obligations	Number of Contracts
D307- IT and Telecom – IT Strategy and Architecture	\$12,335,361	7

We selected the PSCs for analysis based on the criteria below:

- We considered PSCs within the OMB identified special interest functions.
- Largest amount of obligation within these special interest functions.
- We had not analyzed the PSC.