Comments Received from Gary Lazor, Nathan Associates, Inc.

I have several brief comments on Section IV of the *At What Risk?* Document, Second Interim Report to Congress (pg.46): quoted

"Contracting officers report three primary barriers or limitations to using the federal past-performance system:
▪▪ Internet bandwidth constraints in remote overseas environments make connecting to the Web-based database difficult and time-consuming.
▪▪ Contracting officers generally delegate the responsibility to assess and **document contractor performance to contracting officer's representatives** (CORs). But this delegation is problematic given the high turnover rates **among CORs and the consequent lack of familiarity with contractors' past** performance.
▪▪ Federal past-performance policy provides for a lengthy comment, rebuttal, and review process, in which government officials and contractors record their database input sequentially. To avoid the delays these policies and procedures can create, government officials sometimes make an unduly generous assessment—or no assessment at all—**of the true quality of contractors'** performance."

#1 Can report summaries be keyed into the Web-based database following relay from the remote overseas environments? There has to be a simple way to relay narrative information (organized by database field) and submitted in a more internet friendly environment following transmission. If not, can a fix be explored?

#2 As part of COR training is there any integration or extern program in place to better acquaint CORs to the market space contractors occupy? Regarding turnover rates, what type and how much data on each contractor is being recorded and handed down to new CORs? Is there a transition/overlap period and if so, can it be extended?

#3 Past-performance policy requires the iterative process described. Can the turnaround time be shortened in any way or else have the comment/rebuttal/review process only focus on possible negative areas of concern versus an overall thorough past-performance policy. In other words, limit the iteration to problem areas only.

I submit these for consideration and for presentation on 5/2.