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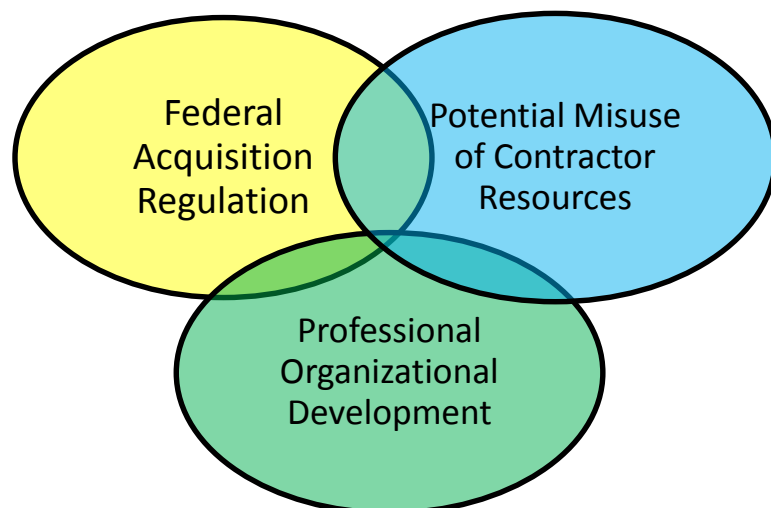
OFFICE OF INSPECTOR GENERAL

Hotline Report: U.S. Chemical Safety Board

CSB Did Not Follow Federal Guidance While Managing the Vantage Contract

Report No. 16-P-0112

March 24, 2016



Report Contributors:

Marcia Hirt-Reigeluth
Gloria Taylor-Upshaw
Michael Davis

Abbreviations

CO	Contracting Officer
COR	Contracting Officer's Representative
CSB	U.S. Chemical Safety and Hazard Investigation Board
EPA	U.S. Environmental Protection Agency
FAR	Federal Acquisition Regulation
OIG	Office of Inspector General

Cover artwork: Diagram of interlocking requirements and issues associated with the CSB's management of the Vantage contract. (EPA OIG)

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At a Glance

Why We Did This Audit

The Office of Inspector General (OIG) for the U.S. Environmental Protection Agency, which is also the OIG for the U.S. Chemical Safety and Hazard Investigation Board (CSB), received a hotline complaint from the former CSB Chairperson.

The hotline complaint expressed concerns about possible misuse of contractor resources and federal funds in relation to a CSB contract with Vantage Human Resource Services Inc. The 1-year contract with Vantage for \$125,000 was to provide professional organizational development consulting services.

In response to the complaint, the OIG initiated an audit to review the CSB's internal actions with Vantage, and to determine whether CSB managed the Vantage contract in accordance with the Federal Acquisition Regulation (FAR).

This report addresses the following CSB goal:

- *Preserve the public trust by maintaining and improving organizational excellence.*

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CSB Did Not Follow Federal Guidance While Managing the Vantage Contract

What We Found

Our review of the concerns cited in the hotline complaint determined that the original contracting officer's representative (COR) and his advisor did not violate the FAR by misusing contractor resources or federal funds. In addition, Vantage did not misrepresent the delivered work product it provided to the CSB board. However, we did determine that the CSB's Managing Director acted inappropriately by approving the COR's request for an advisor without the contracting officer's (CO's) knowledge; instructing a subcontractor to change a contract deliverable; removing the COR from the contract; and directing the CO to appoint him (as Managing Director) to be the COR.

By not following Federal Acquisition Regulation requirements, the CSB's \$125,000 Vantage contract was at risk for mismanagement.

In addition, the COR did not, in line with FAR requirements, provide critical information to the CO so that the CO could exercise adequate oversight. The CO limited her involvement to the award process, issuance of the task order, and several modification orders. The CO assigned day-to-day responsibilities for managing the Vantage contract to the COR. The CO was unaware that the COR made a verbal request to the Managing Director to add a human resource advisor to the contract.

FAR Section 1.602-2 states that COs are responsible for ensuring performance of all necessary actions for effective contracting and ensuring compliance with the terms of the contract. The CO also designates and authorizes CORs to work on contracts, and requests and considers the advice of specialists on contracts. By not overseeing the actions of the CORs or the CSB's Managing Director, the CO was at risk of mismanaging the Vantage contract that ended September 2015.

Recommendations and Agency Corrective Actions

We recommended that the CSB Chairperson require that COs, CORs and the Managing Director obtain training on the requirements outlined in the FAR. CSB provided a planned corrective action and completion date for our recommendation.

We also recommended that the CSB Chairperson update Board Order 024, *Acquisition of Supplies and Services*, to address the roles and responsibilities of COs, CORs and the Managing Director. On February 29, 2016, CSB updated Board Order 024 to address the roles and responsibilities of COs, CORs and the Managing Director. Therefore, we will close this recommendation at the issuance of this report.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

THE INSPECTOR GENERAL

March 24, 2016

The Honorable Vanessa Allen Sutherland
Chairperson and Board Member
U.S. Chemical Safety and Hazard Investigation Board
1750 Pennsylvania Avenue, NW, Suite 910
Washington, D.C. 20006

Dear Ms. Sutherland:

This is the U.S. Environmental Protection Agency's Office of Inspector General (OIG) report on the audit of the U.S. Chemical Safety and Hazard Investigation Board's (CSB's) management of the Vantage contract for organizational development. This report contains findings that describe the problems the OIG has identified and corrective actions the OIG recommends. This report represents the opinion of the OIG and does not necessarily represent the final CSB position.

You agreed with our recommendations and completed corrective action or provided planned corrective actions with completion dates that meet the intent of the recommendations. As a result, you are not required to provide a written response to this report. However, if you submit a response, it will be posted on the OIG's public website, along with our memorandum commenting on your response. Your response should be provided as an Adobe PDF file that complies with the accessibility requirements of Section 508 of the Rehabilitation Act of 1973, as amended. The final response should not contain data that you do not want to be released to the public; if your response contains such data, you should identify the data for redaction or removal along with corresponding justification.

We will post this report to our website at www.epa.gov/oig.

Sincerely,

A handwritten signature in blue ink that reads "Arthur A. Elkins Jr." The signature is fluid and cursive.

Arthur A. Elkins Jr.

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Purpose

The U.S. Environmental Protection Agency's (EPA's) Office of Inspector General (OIG), which is also the Inspector General for the U.S. Chemical Safety and Hazard Investigation Board (CSB), received a hotline complaint from the former CSB Chairperson. Our objective was to respond to the former CSB Chairperson's request to review CSB internal actions related to the Vantage Human Resource Services Inc. contract, and to determine whether CSB managed the contract in accordance with the Federal Acquisition Regulation (FAR).

Background

Authorized by the Clean Air Act Amendments of 1990 (42 U.S.C. 7412(r)(6)), the CSB began operating in 1998 as an independent federal government organization. The agency is headquartered in Washington, D.C., with an investigation office in Denver, Colorado. CSB's mission is to enhance the health and safety of the public, workers and the environment by determining the root causes of accidental chemical releases, and use these findings to promote preventive actions in the private and public sectors. The agency does not issue fines or citations; rather, it makes recommendations to plants, industry organizations, labor groups, and regulatory agencies such as the Occupational Safety and Health Administration, and the U.S. Environmental Protection Agency.



CSB investigators at the scene of a chemical accident. (CSB photo)

The President appoints, and the Senate confirms, CSB board members. The board Chairperson serves as the Chief Executive Officer and is responsible for agency administration, while the full board is responsible for major budgeting decisions, strategic planning and direction, general agency oversight, and approval of investigation reports and studies. Although the CSB board is supposed to be composed of five members, including the Chairperson, during our audit the board consisted of four members, including the Chairperson.



CSB public meeting. (CSB photo)

In September 2014, the CSB awarded a \$125,000 contract to Vantage Human Resource Services Inc. (Vantage), which covered the period of September 26, 2014, through September 25, 2015. The Vantage contract provided for professional organizational development consulting services to help CSB implement recommendations from an organizational health assessment report the agency received in July 2014. The goal of the contract was to enable CSB to operate more effectively, and to be considered by employees and the public as one of the best places in government to work.

The CSB policy and procedures for the acquisition of supplies and services in effect during this audit, Board Order 024, *Acquisition of Supplies and Services*, was under revision. Board Order 024 was over 16 years old (effective December 27, 1999). The policy defined the contracting officer (CO) as a person with the authority to enter into, administer, and/or terminate contracts, and make determinations and findings related to the contracts. The policy defined the contracting officer's technical representative [i.e., the contracting officer's representative (COR)], as the individual responsible for providing technical direction and monitoring the performance of the contract after award. The COR also serves as the liaison between the contractor and the government to ensure enforcement of the terms of the contract. Board Order 024 did not address the responsibilities of the Managing Director.

Scope and Methodology

We conducted this audit from March 2015 to January 14, 2016, in accordance with generally accepted government auditing standards issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

We reviewed the Vantage contract terms as outlined in the performance work statement. We reviewed emails exchanged between CSB and Vantage personnel from February 5, 2015, through February 18, 2015; Vantage invoices; and the draft and final versions of the Vantage PowerPoint presentation. We also interviewed CSB and Vantage personnel to gain an understanding of the events and actions that occurred during management of the contract. In addition, we reviewed CSB internal controls relating to the Vantage contract and used FAR criteria to identify federal contracting requirements.

Results of Audit

In March 2015, the former CSB Chairperson sent a hotline complaint to the EPA's Inspector General requesting a review of CSB's internal actions with the Vantage contract. The complaint alleged:

- Possible misuse of contractor resources and federal funds.
- Inappropriate CSB employee interactions with the Vantage contractors.
- The contractor’s possible misrepresentation about the delivery of work product.

Specifically, the former CSB Chairperson stated the agency learned of:

...potentially inappropriate communications and interactions between one or more CSB employees and Vantage, and the employees’ use of Vantage to further specific study conclusions of their own making. In addition, it appears that these employees and Vantage may have deliberately tried to keep CSB Members and staff from learning the actual source of what was ultimately presented as a “Vantage work product,” and Vantage’s misrepresentation of work product to be delivered.

We have also learned that Vantage appears to have followed specific direction—including the actual writing of recommendations—from a CSB employee who was neither the contracting officers’ representative (COR) assigned to oversee the contract nor the alternate COR (who at all times appears to have been intentionally kept off of all communications relating to the contract). This goes to the very integrity of the contractor’s delivered work product. As this is a labor hour contract, the employees’ misuse of the contractor’s resources (and apparent attempt to keep this fact from CSB management) may have caused the government to expend significant extra funds when compared to the work product Vantage would otherwise have provided...

CSB Did Not Misuse Contractor Resources and Federal Funds, and Vantage Did Not Misrepresent Its Work Product

The former CSB Chairperson expressed concern about the contractor’s possible misrepresentation of the work product. The concern was that the original COR and CSB advisor may have deliberately tried to keep board members, senior managers and staff from learning the actual source of what was presented in the work product. Further, there was concern that the employees’ misuse of contractor resources might have caused the government to expend significant extra funds when compared to the work product that Vantage would have otherwise provided.

According to Vantage, in January 2015, it requested a February 2015 meeting with all CSB board members and senior staff. Vantage contractors prepared a PowerPoint presentation of their findings and recommendations based on interviews with 14 CSB employees. The contractor also stated that, as part of its

processes, feedback on the presentation was requested from the original COR and the CSB advisor.

We reviewed Vantage and CSB emails, and found that the original COR and the CSB advisor communicated to the contractor their comments on the draft presentation. We noticed that the final presentation did include some of the CSB advisor's comments on slides that contained results from the contractor's interviews. However, the presentation's recommendations were not from any CSB staff emails.

Our audit of email exchanges between the contractor and the original COR identified an email that stated, "...[i]t is important for our ability to work amongst our peers and bosses that the presentation belongs to Vantage and that we did not influence or direct you to present the information in any certain way." Vantage agreed to the request.

Our audit of CSB comments on the draft presentation (as made by the original COR and the CSB advisor) did not identify any significant modifications to the presentation. Overall, the work product represents the result of Vantage's work. We determined that the involvement of both CSB employees did not cause the government to expend extra funds. The actions of the original COR and the CSB advisor were not in conflict with contract terms and conditions.

Vantage stated that it was important that CSB board members and senior staff buy into the findings, results and process. Other than a coaching session, there have been no additional deliverables from the Vantage contract since the February 2015 presentation. We reviewed the contractor's invoices and determined that the total cost incurred and billed for the contract was \$47,421.46 of the \$125,000 awarded. The contract ended in September 2015.

CSB Did Not Follow Federal Acquisition Regulation Requirements for the Vantage Contract

The CO did not have adequate oversight of the Vantage contract to fully comply with the terms of the contract and the requirements of the FAR. The CO assigned the COR day-to-day responsibilities for managing the Vantage contract; however, the COR requested the CSB Managing Director's approval to add a human resource advisor to the contract. In addition, the Managing Director inappropriately instructed a Vantage subcontractor to not put the presentation in writing. The CO had no knowledge of the COR's request or the Managing Director's involvement in the management of the Vantage contract.

Responsibilities for COs and CORs are defined in the FAR, Subpart 1.6, *Career Development, Contracting Authority and Responsibilities*. Section 1.602-2, in relevant part, states:

Contracting officers are responsible for ensuring performance of all necessary actions for effective contracting, ensuring compliance with the terms of the contract, and safeguarding the interests of the United States in its contractual relationships. In order to perform these responsibilities, contracting officers should be allowed wide latitude to exercise business judgment. Contracting officers shall—

... (c) Request and consider the advice of specialists in audit, law, engineering, information security, transportation, and other fields, as appropriate; and (d) Designate and authorize, in writing and in accordance with agency procedures, a contracting officer's representative (COR) on all contracts ... A COR— ... (2) Shall be certified and maintain certification ...; (3) Shall be qualified by training and experience commensurate with the responsibilities to be delegated in accordance with agency procedures; ... (5) Has no authority to make any commitments or changes that affect price, quality, quantity, delivery, or other terms and conditions of the contract nor in any way direct the contractor or its subcontractors to operate in conflict with the contract terms and conditions; (6) Shall be nominated either by the requiring activity or in accordance with agency procedures; and (7) Shall be designated in writing, with copies furnished to the contractor and the contract administration office—...

Responsibilities set forth in FAR Section 1.604 state in relevant part:

... [a] contracting officer's representative (COR) assists in the technical monitoring or administration of a contract (see 1.602-2(d)). The COR shall maintain a file for each assigned contract. The file must include at a minimum – (a) A copy of the contracting officer's letter of designation and other documents describing the COR's duties and responsibilities; ...; and (c) Documentation of COR actions taken in accordance with the delegation of authority....

Vantage contractors prepared a PowerPoint presentation as the deliverable for Task Order 4, which the performance work statement required. Task Order 4 states:

The contractor shall provide a written summary of any feedback conducted for the CSB in the monthly progress reports. In addition, the survey/assessments/feedback instruments that have been created by the contractor shall be provided to the CSB no later than thirty (30) days after the survey/assessment/feedback has been conducted.

The CO said the COR was assigned day-to-day responsibilities for managing the Vantage contract. According to the Vantage contract documents, the COR served as the subject-matter expert on the contract, and determined whether to accept deliverables as described in the performance work statement. The COR said he verbally requested of the Managing Director to add another CSB employee as a human resource advisor at the beginning of the Vantage contract, and that the Managing Director verbally approved the request. The COR stated that he asked the Managing Director because the director was the CSB advisor's supervisor, and because the COR wanted to ensure that working on the Vantage contract did not interfere with other ongoing projects.

The COR provided us with slides from the December 2014 Vantage presentation to the CSB board. The slides showed that the next steps on the contract would include working with the COR and the CSB advisor. Therefore, the CSB board was aware of the COR's and the advisor's contract involvement.

The FAR requires the CO to request and consider the advice of specialists, as appropriate, on the contract. FAR guidance also requires the COR to have on file documentation of COR actions taken in accordance with the delegation of authority. However, the COR did not inform the CO about the CSB advisor's involvement in contract activities, and there is no documentation of the verbal request. The CO did not discuss assigning the CSB employee as an advisor to the contract with the COR, but she noted both have human resource backgrounds. The COR said he did not speak with the CO about adding the advisor, because no additional cost or time was being added to the contract.

On February 10, 2015, the Managing Director told a subcontractor for the Vantage contract that he had "significant concerns about their delivering an unvetted written report" at a future meeting. The deliverable was a PowerPoint presentation that was to be presented at an internal meeting with the CSB board members, in response to the contract's Task Order 4. The Managing Director was also concerned that if the presentation was written, it would be leaked to the media. However, Vantage contractors provided the presentation in writing to the COR and to the CSB board.

On February 12, 2015, the Managing Director stated that he believed the contractor's actions were "a serious breach of trust." He also told the Vantage contractors that he would be taking over as the COR, and that henceforward the contractor should report exclusively to him, the CO, or to the former CSB Chairperson. The Managing Director also stated that further instructions would be coming from the CO. That same day, the Managing Director sent an email to the COR and copied the contracting officer. The email informed the COR that the CO was being directed to install the Managing Director as the new COR. However, the Managing Director's certification as a COR had expired. Consequently, the Managing Director was not qualified or authorized to direct or to inform the contractor of his planned actions.

The Managing Director was not the CO or the COR, so according to the FAR he did not have the authority to direct the contractor or its subcontractors to operate in conflict with contract terms and conditions. The Managing Director's actions were inappropriate and contrary to FAR requirements. The FAR requires the CO to designate and authorize, in writing and in accordance with agency procedures, a COR on all contracts. In addition, the FAR requires a COR to maintain certification, and to be qualified by training and experience commensurate with the responsibilities to be delegated in accordance with agency procedures. Specifically, the requirements for COR recertification, depending on certification level, ranges from between 8 to 40 hours of competency-based training.

The CO stated that she had no knowledge of the Managing Director's actions until she was copied on his February 12, 2015, email to the COR. The Managing Director's email directed the CO to assign him as the new COR. The CO said she limited her involvement to the award process, issuance of the task order, and several modification orders. The CO also said she gave the Managing Director a brief test after he took a refresher course on the morning of February 13, 2015, as his recertification, and then modified the contract to make him the COR. Subsequently, on the same day, the CO modified the contract again to replace the Managing Director with a third COR. However, these actions occurred after the Managing Director's inappropriate involvement with the management of the contract. The CO stated that the Managing Director was the COR for less than 24 hours as a stopgap measure until decisions could be made.

The CO did not have adequate oversight of the Vantage contract, because CSB's COR did not, in line with FAR requirements, provide critical information to the CO. As a result, the inappropriate actions of the Managing Director and the COR's addition of an advisor to the contract were not addressed. By not having adequate oversight, the CO risked mismanaging the \$125,000 contract.

Conclusion

Our review of the CSB's concerns cited in the hotline complaint determined that the COR did not violate FAR 1.602-2(d)(5) by misusing any contractor resources or federal funds. In addition, neither the original COR nor the CSB advisor unduly influenced Vantage to include their specific study conclusions. There was also no misrepresentation in the delivered work product.

We determined that the CO had inadequate oversight of the Vantage contract to fully comply with the terms of the contract and the requirements of the FAR. The CO assigned the COR to handle day-to-day responsibilities associated with managing the Vantage contract; however, the CO did not discuss with the COR his request for an advisor on the contract or the Managing Director inappropriately approving the COR's request. In addition, the Managing Director inappropriately instructed a subcontractor of Vantage to change a contract

deliverable. The Managing Director also inappropriately relieved the COR of his duties and directed the CO to appoint him as the COR.

The CO's failure to exercise oversight of the contract could have resulted in the misuse of \$125,000 in contractor resources and federal funds.

Recent Agency Actions Prompted by OIG Work

CSB issued an update to Board Order 024 in response to Recommendation 2 of the discussion document, and in response to concerns identified in EPA OIG Report No. [15-P-0245](#), *CSB Needs to Improve Its Acquisition Approvals and Other Processes to Ensure Best Value for Taxpayers*, issued July 31, 2015. The updated board order, titled *Roles, Responsibilities, and Standards of Conduct in Procurement Activities*, effective February 29, 2016, rescinded all prior versions of Board Orders 024, 027 and any related management directives. The updated board order also defines the roles and responsibilities of COs, CORs and the Managing Director.

Recommendations

We recommend that the Chairperson, U.S. Chemical Safety and Hazard Investigation Board:

1. Require the CSB's contracting officers, contracting officer's representatives, and the Managing Director to obtain training on the requirements in the Federal Acquisition Regulation, Sections 1.602-2 and 1.604, to better understand their roles and responsibilities.
2. Update Board Order 024, *Acquisition of Supplies and Services*, to address the roles and responsibilities of the CSB's contracting officers, contracting officer's representatives, and the Managing Director.

CSB Comments and OIG Evaluation

In response to our discussion document, CSB stated that our report does not address the reporting structure and managerial hierarchy among CSB staff overseeing the contract. However, CSB agreed that "... the contract as a whole could have been handled more efficiently, effectively and transparently by all CSB parties."

For Recommendation 1, CSB stated that it would develop training modules on the requirements stated in the FAR, Sections 1.602-2 and 1.604, to assure employees better understand their roles and responsibilities. Also, CSB stated it will work to complete the training modules by September 30, 2016. We agree that these CSB actions meet the intent of Recommendation 1.

On February 29, 2016, CSB completed Recommendation 2. CSB updated Board Order 024 to address the roles and responsibilities of COs, CORs and the Managing Director. We agree with the CSB's actions related to Recommendation 2. Therefore, we will close this recommendation at the issuance of this report. Appendix A contains the CSB's full response to our discussion document.

Status of Recommendations and Potential Monetary Benefits

RECOMMENDATIONS						POTENTIAL MONETARY BENEFITS (in \$000s)	
Rec. No.	Page No.	Subject	Status ¹	Action Official	Planned Completion Date	Claimed Amount	Agreed-To Amount
1	8	Require the CSB's contracting officers, contracting officer's representatives, and the Managing Director to obtain training on the requirements in the Federal Acquisition Regulation, Sections 1.602-2 and 1.604, to better understand their roles and responsibilities.	O	Chairperson, U.S. Chemical Safety and Hazard Investigation Board	9/30/16		
2	8	Update Board Order 024, <i>Acquisition of Supplies and Services</i> , to address the roles and responsibilities of the CSB's contracting officers, contracting officer's representatives, and the Managing Director.	C	Chairperson, U.S. Chemical Safety and Hazard Investigation Board	2/29/16		

¹ O = Recommendation is open with agreed-to corrective actions pending.
 C = Recommendation is closed with all agreed-to actions completed.
 U = Recommendation is unresolved with resolution efforts in progress.

CSB Response to Discussion Document

**U.S. Chemical Safety and
Hazard Investigation Board**

1750 Pennsylvania Avenue NW, Suite 910 | Washington, DC 20006
Phone: (202) 261-7600 | Fax: (202) 261-7650
www.csb.gov

Vanessa Allen Sutherland
Chairperson and Member

Manny Ehrlich, Jr.
Board Member

Rick Engler
Board Member

Kristen M. Kulinowski, Ph.D.
Board Member



January 29, 2016

Mr. Kevin Christensen
Assistant Inspector General for Audits
Office of Inspector General
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W., (2410T)
Washington, DC 20460

Dear Mr. Christensen:

Thank you for providing the CSB a copy of the discussion document, *CSB Did Not Follow Federal Guidance While Managing the Vantage Contract*, for our review and comment. While the discussion document and some of its conclusions do not address the important issue or effect of the reporting structure and managerial hierarchy among the Contracting Officer, the Contracting Officer Representative and the Managing Director in overseeing the contract, we do agree that the contract as a whole could have been handled more efficiently, effectively and transparently by all CSB parties.

In order to ensure effectiveness going forward, the CSB will address the recommendations provided in the discussion document.

Recommendation 1 – The CSB will develop training modules on the requirements stated in the Federal Acquisition Regulation, Sections 1.602-2 and 1.604, to assure employees better understand their roles and responsibilities. We will work to complete the training modules by September 30, 2016.

Recommendation 2 – The CSB completed its update to Board Order 24, Acquisition of Supplies and Services on Friday, January 15, 2016. The draft Board Order has been reviewed by the Chairperson and will be presented to the Board for notation vote no later than January 25, 2016. Once board vote has been completed, a copy of the revised board order will be forwarded to you.

**U.S. Chemical Safety and
Hazard Investigation Board**

If you or your staff have any questions about this response, please feel free to contact Anna Brown, Audit Liaison, at 202-261-7639.

Sincerely,

A handwritten signature in cursive script that reads "Vanessa Allen Sutherland".

Vanessa Allen Sutherland
Chairperson and Board Member

Distribution

Chairperson and Board Member, U.S. Chemical Safety and Hazard Investigation Board
Board Members, U.S. Chemical Safety and Hazard Investigation Board
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