

PD-AY-229
12/5/2012

UNITED STATES AGENCY FOR INTERNATIONAL DEVELOPMENT

CONTRACT NO. OTR-00000-C-00-7207-00

FAAR AND CNPP COURSES

SEMI-ANNUAL REPORT

TO THE CONTRACTING OFFICER

Submitted By
MANAGEMENT CONCEPTS INCORPORATED

Management Concepts Incorporated has now provided the United States Agency for International Development with curriculum development and student instruction for one presentation each of the course materials entitled Federal and AID Acquisition Regulations (FAAR) and Contracting for Non-Contracting Personnel (CNPP). The progress of those courses has been described in reports to AID project personnel; those reports are incorporated in this semi-annual report, of which they form an integral part.

Further, recommendations for the restructuring of the way AID trains its contracting and project personnel have been carefully delineated in a memorandum, also incorporated, from the course instructor, Professor Patricia Bleicher. That document is the essence of this semi-annual report, for its proposals are based on lessons learned in the first half-year of the contract and provide a sound basis for predicting even greater success for the work of the contract in future.

MCI believes that its recommendations will save AID many thousands of dollars in future training costs. Whatever equitable adjustments are necessary to compensate fairly for changes required in this initial contract period will be more than repaid by aggregate savings. Moreover, MCI is certain that improved instructional materials and methods will result in superior training of AID contracting and project personnel, and that that ultimately will provide the United States with the most important long-term return on its educational investment.

Officials of MCI, the course instructor and AID contract and project officers will soon meet to discuss the effect of proposed changes on the contract and any necessary modifications that a new instructional system might require. If there are any questions concerning these materials, in the absence of the project manager, who is presently out of town, the MCI person to contact is Thomas F. Dungan, President, (703) 790-9595.



UNITED STATES AGENCY FOR INTERNATIONAL DEVELOPMENT

CONTRACT NO. OTR-00000-C-00-7207-00

PROGRESS REPORT (FAAR),
SUPPLEMENTING MATERIAL PROVIDED TO AID ON OCTOBER 23, 1987

Submitted By
MANAGEMENT CONCEPTS INCORPORATED

This supplements material provided to AID on October 23, 1987, concerning the Federal and AID Acquisition Regulations course conducted by Management Concepts Incorporated (MCI) at AID facilities September 28-October 26, 1987. Material provided included all registration documents (roster, attendance sheet, student performance evaluations, registration forms for certificates and course certificates) plus student course evaluations and comments, including some extended commentary written by students.

Of the 16 attendees in this course (15 students and one observer) 15 rated the course excellent or very good, the highest categories possible, for every one of the rating criteria: organization and clarity of course materials, usefulness of course materials, instructor's knowledge of material, instructor's presentation and delivery and overall evaluation of course. In the opinion of MCI, these evaluations and the instructor's analysis of the learning experience both indicate that this course was a truly remarkable success. It is important to note that this success was achieved in MCI's first presentation of the current text materials for FAAR.

In-class discussion and student evaluation sheets reflected that the most frequently occurring comment concerned satisfaction with the methods used by the instructor, who is noted for innovative teaching and ability to adapt actual case studies for responses to student inquiries. Professor Bleicher achieved rapport with students from a wide variety of cultures, including individuals with widely-varying English language skills (she also used French to assist comprehension by two African students).

Second, students expressed serious concern about the handicap imposed on some attendees by having to proceed more slowly so that

non-native speakers of English could follow class materials; conversely, some students expressed concern that they were required to spend many non-class hours struggling with the English materials because class went too swiftly for their language skills. Please note that this major concern is not represented in the evaluation sheets to the extent that it was in discussions. Several students feared they would be accused of race or cultural bias if they wrote their concerns; after several very heated complaints, the instructor promised that she would document the problem, which is surely one of English language ability only. The instructor discussed the problem at some length with John Jessup, training director, who has suggested that the problem is AID's: the agency must set higher standards for language competency for individuals who are to participate in FAAR or any successor course.

Third, there were five students who suggested that examples should be more AID-specific. MCI notes that all examples used for text were the agency's own materials, so the issue appears to focus on how many AID examples will be used in the course. MCI has directed Professor Bleicher to work with Liz Cordaro and Kitty O'Hara in locating additional instructional materials from the agency's files which may be used in future courses.

Fourth, the instructor evaluation of this course leads MCI to conclude that several major changes should be made in the teaching of materials now referred to as FAAR materials. Professor Bleicher met with Ms. Cordaro and Ms. O'Hara after the course to discuss some of those concerns, and she is preparing a comprehensive memorandum to contain her recommendations to AID. This memo will be submitted after the teaching of the CNPP course, so that recommendations from that course may be included in a proposed restructuring of the way AID trains contracting personnel (FAAR) and project personnel (CNPP). Therefore, when Professor Bleicher's memorandum is complete, it will be incorporated into this report by reference.

Finally, MCI again reports that it furnished twenty copies of all texts used in the FAAR course (many thousands of photocopied pages in three extra-large ring binders) as provided by the contract, and that it was also obliged to furnish twenty of copies of AID Contract Information Bulletins, which were not contemplated in the original contract. MCI has therefore incurred costs for one additional extra-large ring binder and several hundred additional photocopied pages for each of twenty text sets. It is clear that CIBs should be included in the FAAR materials (in fact, all AID Handbooks should also be included) as an educational tool of great importance to contracting personnel; it is equally clear that MCI cannot carry the burden of this extra expense. Further discussion of this expense awaits basic course decisions which should be made jointly by MCI and the Contracting Officer.



UNITED STATES AGENCY FOR INTERNATIONAL DEVELOPMENT

CONTRACT NO. OTR-00000-C-00-7207-00

PROGRESS REPORT (CNPP),
SUPPLEMENTING MATERIAL PROVIDED TO AID ON NOVEMBER 20, 1987

Submitted By
MANAGEMENT CONCEPTS INCORPORATED

This supplements material provided to AID on November 20, 1987, concerning the Contracting for Non-Procurement Personnel (CNPP) course conducted by Management Concepts Incorporated (MCI) at AID facilities November 3-6, 1987. Material provided included all registration documents (roster, attendance sheet, student performance evaluations, registration forms for certificates and course certificates) plus student course evaluations.

Notwithstanding the provisions of the AID contract, MCI met the changed requirements for this course to provide textbook sets for 33 and high-level instruction for 30 students scheduled to arrive at the agency facility. Of 29 attendees, one was an agency observer and one left in mid-course for personal business, so 27 students evaluated the course. Those students gave CNPP high marks in all categories.

Among the evaluators, all 27 rated the course excellent or very good, the highest categories possible, for instructor's knowledge of material, instructor's presentation and delivery and overall evaluation of the course. In addition, 25 of the 27 students rated organization and clarity of course materials and usefulness of course material as excellent or very good. One student was so impressed with the course that he/she added another category for "super" to describe instructor's knowledge of material and usefulness of course material. In the opinion of MCI, these evaluations and the instructor's analysis of the learning experience both indicate that this course was a remarkable success in difficult circumstances, even though it was MCI's first presentation of the current text materials for CNPP.

In-class discussion and student evaluation sheets reflected that the most frequently occurring comment concerned satisfaction with the methods used by the instructor, who tailored highly

specialized legal and regulatory materials into examples within the experience of project and support personnel, and who gave personalized instruction during the statement of work writing exercises--both in small groups and individually.

The most frequently heard complaint was the size of the class as compared to the size of the facility: unquestionably, the room was too small for 30 persons. The instructor believes that the size of the class was too large regardless, that no more than 25 should be admitted, based on purely educational concerns. MCI notes that the language of the contract is in dispute concerning the maximum number of students for CNPP: the original language, relied upon by MCI for pricing, is "a minimum of 15 up to a maximum of 20 students", though later, in Section H, the maximum is given as "up to 30 students" and several discussions between MCI executives and AID contracting officials have not resolved the issue of how MCI will be compensated for providing 33 sets of textbook materials when it was able to budget for 20 or 25. This is one of several issues which must be resolved by MCI and the Contracting Officer; it is clear that MCI cannot carry the burden of this extra expense.

The second most frequent complaint was the forcing of course materials into only four days of instruction; all students and the instructor believe these materials require five days for student comprehension. In this context, it should be noted that even the title of the course, Contracting for Non-Procurement Personnel, is no longer accurate, since assistance and grants to host governments are now covered (however briefly) by the course and since that extends time required. This concern will be addressed by Professor Bleicher in a memorandum to Liz Cordaro which is to propose a restructuring of the way AID trains project personal and contracting staff.

Please note that both these major concerns (size of class and length of course) are not represented in the evaluation sheets to the extent that they were in discussions; the instructor promised that she would document the problems. Professor Bleicher discussed the problems in a meeting with John Jessup, training director; Liz Cordaro was out of the country at the end of the CNPP course, or she also would have been contacted.

Several students commented that the text ring binder, which was adequate when distributed, proved too small for text materials after handouts used in classroom exercises had been incorporated. In future, MCI will provide binders of a size appropriate to revised course materials, but such size may be affected by changes Professor Bleicher will propose in course coverage. Two students commented on text arrangement, and MCI has directed the instructor to incorporate both suggestions into revision of CNPP materials, subject to any course changes that may be effected.

Finally, the instructor evaluation of this course leads MCI to conclude that several major changes should be made in the teaching of materials now referred to as CNPP materials. Professor Bleicher has met briefly with Kitty O'Hara and Liz Cordaro's assistant to discuss some of those concerns, and she is preparing a comprehensive memorandum to contain her recommendations, including those listed above plus those related to the FAAR course also presented under this contract. When Professor Bleicher's memo is complete, it will be incorporated into this report by reference. Further discussion of any restructuring of AID training awaits basic course decisions which should be made jointly by MCI and the Contracting Officer.

M E M O R A N D U M

TO: Liz Cordaro, AID Project Officer
FROM: Pat Bleicher, MCI Professor
DATE: December 28, 1987
RE: Structure of AID Contracts Courses

Now that you and I have some valuable experience working with the AID contracts courses, it is possible to draw some important conclusions about aspects which are of greatest value to groups within the Agency for International Development. My recommendations are enthusiastic, for I believe they are based in fact and likely to achieve goals you have articulated for the agency. I look forward to discussing the following recommendations with you after the first of the year.

I. Materials currently covered in FAAR and CNPP courses should be part of one unified instructional system.

The most clearly defined truth that emerged from these experiences is that, in AID contracting, "the right hand does not know what the left hand is doing" and that's a shame. Project people, contracting staff and policymakers are all AID decisionmakers, but they frequently speak different languages and confuse issues important to each group. I propose to teach them together, to the extent that this is possible, and help them to share solutions to problems. The unified instructional system which I propose to develop would be based on additional lessons learned in FAAR and CNPP in 1987, and it would be helpfully flexible.

A. CNPP and beginning FAAR materials are essentially the same and should be taught jointly to AID project officers and professional contracting staff, permitting cross-fertilization of ideas.

B. CNPP materials cannot be covered adequately in four days; five days are required for student mastery.

C. FAAR use-of-sources materials can be adequately covered in less than one week if taught immediately after the five-day materials previously covered in CNPP.

D. Personalized training for warrant-seekers can also be covered in less than one week, and may be combined with use-of-sources materials to create one additional week of instruction.

E. A course of instruction that ran CNPP materials (which now include assistance programs, making the course title wrong) plus use-of-sources materials plus a seminar for warrant-seekers would last a total of only two weeks, not three as currently scheduled. This would save AID a great deal of money and lost employee time, and savings would continue over the long term.

F. There is great need for an efficient, abbreviated course to train foreign service nationals, local AID contractors and staff whose duties are only peripheral to contracting. The primary difference between these individuals and others is that they have less of a need to learn statement of work writing and the intricacies of technical evaluations and source selection procedures. I note that this is the group with the greatest number of non-native-English-speaking persons.

G. These concerns are most effectively addressed by a flexible instructional system that is able to meet changing needs for training in all parts of the world.

On separate pages of this memo, I have proposed such an instructional system for your consideration. MCI can be ready to begin training using this system by the next FAAR course period, currently scheduled for March 28-April 15. Please note that with the new system of instruction, this course would end April 8 instead. As you know, my schedule is booked far in advance, but MCI has arranged for me to teach this course, and I am personally delighted with the possibility of working further with AID, where I have now made some great friends.

II. Materials for the second part of the FAAR course require special attention from AID instructors and agency personnel.

It became clear, in the course of teaching, that the contract between AID and MCI had inadequately addressed the special problems of text provision in the second and third week of the FAAR course. Now that we have this experience to guide us, we can more accurately project future needs for cooperative effort.

A. The contract obviously should have stated that MCI would provide texts for each person attending the course and set only a limit on the total number of persons who could attend. Certainly the CO should also have included a copy for you as project officer. MCI should have included a "final count" deadline to keep production in line with need. These conclusions apply to both FAAR and CNPP provisions.

B. The materials which are absolutely essential to the

preparation of your contracting personnel include all of the following:

FAR
AIDAR
Every AID Handbook and Guidebook
All CIBs currently in effect

plus any additional materials your own staff has determined are necessary for understanding AID policy concerns. Failure to provide any part of these materials leaves the staffer with a gap in knowledge that can create bad news for AID.

It is certainly true that these multi-volume, heavy, hard-to-ship materials are a most difficult aspect of AID training, but they must be provided, and they must be completely up-to-date as of the time class begins. If the preparation of these materials is to be the job of the contractor, AID policy staff must provide day-to-day cooperation to assure timeliness and completeness of all legal and regulatory materials. It must be the job of MCI staffers to see that materials provided students incorporate all recent changes and additions.

C. When AID wishes the source materials to be part of a course taught overseas, special arrangements for transport of the voluminous texts must be completed in advance.

D. Finally, I cannot over-emphasize the importance of teaching AID contracting professionals from the original sources themselves. Many times throughout the FAAR course, students took positions on the legality and advisability of certain actions and found that their positions were completely contrary to law or regulation. Indeed, some students reported that they had often or always taken such obviously-unauthorized positions and were willing to concede their nature only when confronted with the very text of the an act or regulatory provision. Whatever inconvenience to AID there may be in providing source materials will surely be repaid in more conscientious contracting for AID. I joked with some FAAR students that you could recover your text investment on attorneys' fees alone.

III. The cooperation of your staff and professional colleagues was most helpful and enhanced student learning.

I personally appreciate the extent to which you, Kitty, John and Jean made my job easier, and I was grateful to those on your staff for their assistance.

In addition, I found it very helpful to have an observer with the talents of Jimm in the FAAR class; he made a great contribution. I did have some concern in connection with CNPP; perhaps future observers could spend all classtime with the group instead of jumping up to leave when practical exercises are announced. This practice did not bother me personally, but it was

most disruptive for participants, who complained a good deal. Jean will be able to give you her comments on this concern.

Kitty's special presentation and her later revisit to the CNPP class were exceptionally useful, but I most appreciated her answering my phone question the day we had a FAAR student adamantly defending an action that was patently illegal. Let's continue that spirit of close cooperation!

IV. Filling classes to capacity can be counterproductive.

AID project personnel are generally outgoing, personable and easy to engage in conversation. While this is one of your agency's great strengths, it also produces some difficulties. AID people like to talk when they are in class, too. In my opinion, the full complement of 30 students who took the CNPP class is too many to maintain proper communications for retention of information. I did have to work harder, but this is no cop-out for me: your own people will do better if you limit classes to 25. At the very least, you must find classrooms large enough to permit the greater number of students to move about while working and to talk without getting on each other's nerves.

V. Teaching students to be sharp contracting personnel makes them sharp in other ways: we have located several areas in need of improvement in AID's own forms and regulations.

Once our FAAR students mastered some contracting principles, they set to work examining the only materials they had at hand-- your own agency regulations and forms. In the process, a variety of errors and omissions were discovered. I am preparing a memo for Kitty to outline those points, and I will propose that AID adopt a new contractor-evaluation form for contracting officers and for project officers (draft to come). Good training leads to a variety of good results.

VI. One subject area of concern in both courses was transport of contract goods/personnel; we need case materials on this..

This is a small matter, but if you could locate some actual case materials on the working out of transportation concerns, we might incorporate them in future courses. There were questions.

Altogether, I believe these two courses have been successful for AID students, so I am encouraged about future programs of instruction. Please call me early in 1988 to arrange our next discussion. May your new year be wonderful!

PROPOSED UNIFIED INSTRUCTIONAL SYSTEM FOR AID

BASIC COMPONENTS OF THE SYSTEM

- A. Introduction and overview, foreign assistance, grants and cooperative agreements, basic contracting principles, AID constitutional and legal framework, major steps in the procurement process, contracting personnel, competition requirements, methods of contracting, contract types [one-half day]
- B. Defining the acquisition requirement: what the government needs and how it can best be obtained for AID purposes
- B.1 Writing work statements/specifications and evaluation criteria (mastery program with exercises and critique [two and one-half days])
 - B.2 Overview: importance of work statements and tools useful to source selection [one-half day]
- C. Materials for project personnel; special considerations unique to international procurement, policy goals and ethical concerns, sources of supply, preparing the PIO/T, evaluation of offers, contract administration, subcontracting, socioeconomic policies in AID contracting, terminations, closeout [two days]
- D. Intensified instruction in the use of contracting tools: FAR, AIDAR, Handbooks and Guidebooks, CIBs; close scrutiny of contracting methods--small purchases, sealed bidding, competitive proposals, sole source procurements, major systems [five days]
- E. Warrant seminar: intensified, personalized instruction for persons seeking warrant authority as CO (very high level of competence required for entry) [two days]

METHODS OF ORGANIZING COMPONENTS TO MEET VARYING NEEDS

The most effective use of AID training funds may be obtained by adjusting instructional content to fit training needs, which vary with time, number and location of personnel and their specialities. The following are suggested methods of organizing components of what Management Concepts calls the Flexible Instructional System in Contracting and Assistance Law, or FISCAL.

FISCAL ABC

This course (in some ways like CNPP and the first week of FAAR, but with many enrichments) would last one five-day week and would prepare project personnel and support staff well with components A, B.1 and C. (Suggested maximum of 25 students)

FISCAL PRO

This one-week course would follow FISCAL ABC immediately and add to that basic material component D for all contract-office staff, thus providing in-depth training for professional contracting personnel in only two weeks. (Maximum of twenty students)

FISCAL C.O.

This two-day seminar could follow FISCAL ABC and PRO immediately or could be held whenever and wherever enough students are sufficiently prepared to be warranted. Course materials would cover component E, and passing of the seminar examination would provide grounds for believing the student capable of serving as a warranted contracting officer for AID. (Very strongly suggested maximum of ten students, all at a very high level of competence)

FISCAL INTRO

This three-day overview course would combine components A, B.2 and C and could be of use to AID contractors, certain managers without project officer duties and (perhaps) embassy staff. This course could be of special importance in the training of foreign service nationals who serve as staff members in many AID contracts offices, but who cannot be warranted and who will not have definitional responsibilities as project officers. It could be adjusted easily to respond to varying degrees of command of the English language.

(The maximum number of students who are native speakers of English would be thirty; when FSNs participate, adjustment in the maximum number of students is required to assure mastery of English-based materials. Please note that for some FSN FAAR participants, sixteen was too great a maximum to permit personalized attention that fosters understanding.)

All relevant personnel must understand that INTRO is not an acceptable substitute for specialized instruction in preparing individuals for service as project officers or contracting officers; it is just an introduction to be used for no purpose other than preliminary briefing of interested parties. It would be a portable course, since its materials would be less substantive than ABC or certainly ABC/PRO, and it could easily be taught anywhere in the world, as required.

COMBINATIONS

Benefits are possible in all sorts of international contracting situations, which can be of special advantage to AID. For example, one three-week trip to Cairo could combine ABC for 25 students, PRO for up to 20 professional contracting staff and C.O. warrant seminar training for up to ten contracting officers, plus

introductory sessions for a group of foreign nationals and staff. Indeed, the only limiting factors in use of this flexible system are locations of persons to be trained and extra effort required to transport texts for ABC/PRO; it seems clear to me that transporting two MCI staffers to one central overseas location will always be less expensive than transporting thirty participants from a variety of locations, and no lost work time for travel would be involved.

BEST BENEFIT FOR AID

FISCAL ABC plus PRO provides in-depth training for contracting staff in only two weeks, instead of the current three required by FAAR. Over the years, this could save AID a bundle.

15