

Comment on DOD IG Report for Lackland AFB A-76 Study
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My biggest issue with report is the IRO (Independent Review Office) role. The IG criticized AETC a great deal because the IRO review was not done by qualified people and with the same degree of detail as that done by the SSET (Source Selection Evaluation Team) on contractors proposals. To a point, the IG seems to suggest that the MEO can't be relied upon to prepare a good bid, and the IRO needs to ensure that it happens, in essence, mandating a government team with the skills of an SSET to validate the MEO proposal. Part of this it because the SSET can't review the MEO cost proposal, so some government entity has to do it. To that end, I think the Army has a better plan in that they "outsource" the IRO to the Army Audit Agency. But it almost puts the burden of success not on the MEO but on the IRO, and that to me is wrong. The MEO should be free to bid on their own merits just like a contractor. We wouldn't convene an IRO to assist a contractor? On the flip side, what's wrong with permitting the SSET to review the MEO's cost proposal just like they do a contractor's as was done with the aircraft maintenance A-76 study at Andrews AFB?

I think an improvement to the process is not to beef up the IRO to the point that the IRO becomes an SSA-Source Selection Authority-like entity deciding when the MEO satisfies the bid requirements, shifting control of destiny from the MEO to yet another government agency, but rather allowing the SSET to analyze the MEO bid after the determination of Best Value. Then the MEO is forced to answer an informed SSA on areas of underperformance just like a contractor must. The IRO can still certify that the changes to the MEO bid are 'true, accurate and complete'. The IG report almost seems to want to make the IRO the SSA for the MEO in that the IRO decides when the requirements are satisfied and what an acceptable bid.

My concern with the IG approach is that the IRO power over the MEO bid becomes almost unchecked and supplants the SSA because in essence the IRO becomes an SSA in that he/she decides when the approach and cost are acceptable. The playing field should not be divided that way. The MEO should be empowered to respond to the SSA, not some other entity. I would recommend allowing the SSET to review the MEO cost proposal after BV to determine its adequacy, rather than IRO, and leave the IRO the role of concurring with the SSET 'deficiency notices' and verifying that the MEO responds appropriately.

I'm concerned that we are moving towards as system where two different decision makers determine adequacy and responsiveness to one single requirement, the SSA for contractors and the IRO for the MEO. I believe that opens the possibility for more problems not less, as you have two decision makers, not one. Leave that job to the SSA and keep the IRO in a 'certification and audit' role, rather like commercial firms having reports "audited" by Price-Waterhouse. Those type of audits don't say the proposal will work, it just says the numbers add up in a logical fashion. I read the DoD IG has wanting the IRO to do both. The SSA should retain the proposal acceptability function, and just let the IRO determine or audit the math. Much of what I saw in the report gives the IRO the role of determining the adequacy of the proposal beyond just the pricing, and that to me is problematic, if only in that it take responsibility for the bid away from the MEO where it belongs.