



May 2021

SPARE PARTS CONTRACTS

Collecting Additional
Information Could
Help DOD Address
Delays in Obtaining
Cost or Pricing Data



A Century of Non-Partisan Fact-Based Work

GAO@100 Highlights

Highlights of [GAO-21-388](#), a report to congressional committees

Why GAO Did This Study

DOD spends billions of dollars each year on spare parts for planes, ships, and other equipment. While DLA buys the bulk of the spare parts, the military departments also acquire them to support specific weapon systems. DOD seeks to negotiate a reasonable price for these spare parts to award contracts in a timely manner. DOD uses data other than certified cost or pricing data if it determines certified cost or pricing data are not required to determine prices are reasonable.

The National Defense Authorization Act for Fiscal Year 2020 included a provision for GAO to review DOD's efforts to obtain contractor cost or pricing data. This report 1) describes how often DLA obtained cost or pricing data on sole-source contracts for spare parts; and 2) assesses the extent to which DOD tracks delays in obtaining these data and the reasons for those delays. GAO reviewed federal and DOD acquisition regulations and analyzed data for 136 DLA spare parts contracts awarded between fiscal years 2015 to 2019. For fiscal year 2019, GAO also selected 10 sole-source contracts awarded by DLA, Air Force, and the Navy, based on dollar value and other factors, to identify challenges in obtaining cost or pricing data. GAO also interviewed DOD and contractor officials.

What GAO Recommends

GAO recommends that DOD identify options for collecting information on the extent and nature of delays that contracting officers experience in obtaining cost or pricing data on sole-source contracts. DOD concurred with the recommendation.

View [GAO-21-388](#). For more information, contact Timothy J. DiNapoli at (202) 512-4841 or DinapoliT@gao.gov.

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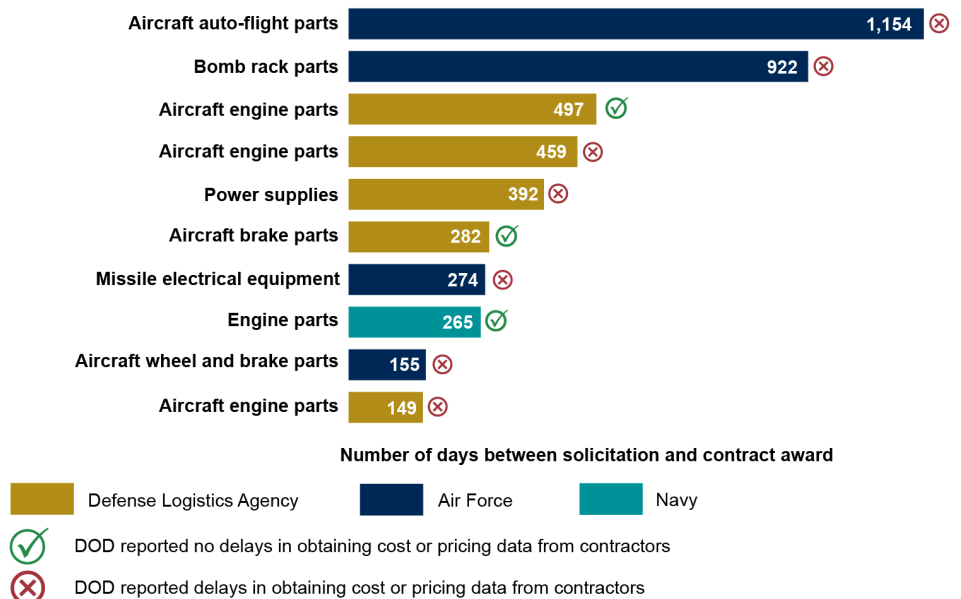
Collecting Additional Information Could Help DOD Address Delays in Obtaining Cost or Pricing Data

What GAO Found

When the Department of Defense (DOD) awards contracts without competition, contracting officers may rely on cost or pricing data that contractors certify as accurate, current, and complete to determine if the prices are reasonable. DOD uses data other than certified cost or pricing data when certified cost or pricing data are not required. GAO found that, during fiscal years 2015 to 2019, the Defense Logistics Agency (DLA) obtained data other than certified data for 77 of the 136 sole-source spare parts contracts it awarded. As the 77 contracts were for commercial items, statute prohibits contracting officers from requiring certified cost or pricing data. DLA also waived the requirement to obtain certified cost or pricing data in two cases, citing the exceptional need for the spare parts. DLA obtained certified cost or pricing data for the remaining sole-source contracts.

In March 2019, DOD issued a memorandum requiring defense agencies to report when contractors outright refuse to provide cost or pricing data, but it is not collecting data on the extent that delays in obtaining data affect the time that it takes to award contracts. DLA, Air Force, and Navy contracting officers said that while they were able to determine if prices were reasonable, delays in obtaining contractors' cost or pricing data contributed to the length of time needed to award seven of the 10 sole-source spare parts contracts GAO reviewed (see figure).

Length of Time to Award 10 Sole-Source Contracts in Fiscal Year 2019 That GAO Reviewed



Source: GAO analysis of Department of Defense (DOD) contract documents and interviews with agency officials. | GAO-21-388

DOD's March 2019 memorandum highlighted the need to understand, DOD-wide, the extent that contractors do not comply with contracting officer requests for data other than certified cost or pricing data. However, the focus was on outright refusals and not delays. Without a means to monitor or identify the nature and extent of delays, DOD is missing opportunities to develop approaches to effectively address these issues and potentially award contracts faster.

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Abbreviations

CPARS	Contractor Performance Assessment Reporting System
DFARS	Defense Federal Acquisition Regulation Supplement
DLA	Defense Logistics Agency
DOD	Department of Defense
DPC	Defense Pricing and Contracting
FAR	Federal Acquisition Regulation
FPDS-NG	Federal Procurement Data System-Next Generation
HCA	Head of Contracting Activity
NDA	National Defense Authorization Act
PGI	Procedures, Guidance, and Information

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May 26, 2021

Congressional Committees

The Department of Defense (DOD) spends billions every year on spare parts for its planes, ships, and other equipment. The Defense Logistics Agency (DLA) is the primary buyer for spare parts within DOD, typically accounting for about 80 percent of spare part purchases. DLA also works with the military departments to manage and distribute the spare parts that are needed to keep military equipment operating.

DLA contracting officers use several techniques and types of data to determine that the prices paid for spare parts are fair and reasonable. DLA generally relies on competition to do so. When it buys spare parts on a sole-source basis, e.g., awarded without competition to a single company, DLA contracting officers either obtain certified cost or pricing data—information contractors certify as accurate, current, and complete—or when certified cost or pricing data are not required to determine if prices are reasonable, they rely on data other than certified cost or pricing data.¹ A number of factors, such as the anticipated dollar value of the contract and whether the item is commercial in nature, determine whether DLA is required to obtain cost or pricing data. In this report, we use the term “cost or pricing data” to mean a category that includes both certified cost or pricing data and data other than certified cost or pricing data.

Section 804 of the National Defense Authorization Act (NDAA) for Fiscal Year 2020 included a provision for us to review DOD’s efforts to obtain data from contractors to determine the reasonableness of proposed

¹Certified cost or pricing data are required to be submitted in accordance with Federal Acquisition Regulation (FAR) 15.403-4 and 15.403-5 and have been certified, or are required to be certified, in accordance with 15.406-2. This certification states that, to the best of the person’s knowledge and belief, the cost or pricing data are accurate, complete, and current as of a date certain before contract award. Data other than certified cost or pricing data means pricing data, cost data, and judgmental information necessary for the contracting officer to determine a fair and reasonable price or to determine cost realism. Such data may include the identical types of data as certified cost or pricing data but without the certification, FAR 2.101. See FAR 15.403-4 for the requirement for certified cost or pricing data. See FAR 15.402(a)(2) for examples of data other than certified cost or pricing data. When contracting officers are required to obtain certified cost or pricing data, they must also obtain any other cost or pricing data necessary to determine price reasonableness. FAR 15.402.

prices.² This report (1) describes how often DLA obtained cost or pricing data to determine the reasonableness of prices for sole-source spare parts during fiscal years 2015 to 2019; and (2) assesses the extent to which DOD is tracking delays in obtaining contractors' cost or pricing data and the reasons for those delays for sole-source spare parts contracts during fiscal year 2019.³

To describe how often DLA obtained cost or pricing data for sole-source spare parts contract awards, we collected data from DLA on sole-source contracts awarded between fiscal years 2015 through 2019 (the latest year with complete contract data at the time we began our review). We matched the DLA data with information obtained from the Federal Procurement Data System–Next Generation (FPDS–NG) to determine which contracts had award values, including unexercised options, greater than the dollar thresholds for which certified cost or pricing data would be required.⁴ These thresholds were \$750,000 or greater if awarded on or before June 30, 2018 and \$2 million or greater if awarded on or after July 1, 2018. We used FPDS-NG to determine which contracts used commercial item acquisition procedures and to determine whether DOD had reported waiving the requirement to obtain certified cost or pricing data for any of the sole-source contracts. We electronically tested the data from FPDS-NG and verified it with DLA, and determined it was sufficiently reliable for our purposes of determining the following characteristics of DLA spare parts contract awards: value at the time of award, requirement for certified cost or pricing data, and award on a sole-source or competitive basis.

To assess the extent to which DOD tracks delays related to obtaining contractors' cost or pricing data and reasons for any delays, we reviewed the Defense Federal Acquisition Regulation Supplement (DFARS) and a

²National Defense Authorization Act for Fiscal Year 2020, Pub. L. No. 116-92, § 804 (2019).

³For the purposes of this report, we refer to sole-source contracts as those awarded using other than full and open competition, including those coded as “unique source” or “only one source-other” in the Federal Procurement Data System-Next Generation (FPDS-NG). See FAR 6.302-1(a)(2) and 6.302-1(b)(1). Contractors must submit certified cost or pricing data unless an exception applies, such as a waiver to the requirement to submit such data for offers for contracts that are estimated to be above the Truthful Cost or Pricing Data threshold of \$750,000 or greater if awarded on or before June 30, 2018 and \$2 million or greater if awarded on or after July 1, 2018. 10 U.S.C. § 2306a and 41 U.S.C. § 3502.

⁴FPDS-NG is the government's online repository for contract data.

March 2019 memorandum from the Defense Pricing and Contracting (DPC) office regarding actions that contracting officers are required to take when contractors refuse to provide cost or pricing data. DPC is the office responsible for contracting and defense pricing policies at DOD and, organizationally, reports to the Under Secretary for Acquisition and Sustainment. We assessed DPC's process for tracking refusals against GAO's internal control principle that management obtains relevant data from reliable internal and external sources in a timely manner based on the identified information requirements to achieve the entity's objectives.⁵

To illustrate the challenges in obtaining data experienced in fiscal year 2019, we selected 10 contracts from DLA, Air Force, and Navy to review as non-generalizable case studies, based on factors such as the number of days between solicitation and award dates, and contract award values.⁶ For each contract, we reviewed the solicitation, contract, and the price negotiation memorandum and interviewed contracting officials responsible for negotiating the contract. To obtain contractors' perspectives on delays and reasons for delays in providing cost or pricing data to contracting officers, we interviewed three of the contractors. We selected the contractors based on the highest number of days between solicitation and award dates. See appendix I for additional information on our scope and methodology.

We conducted this performance audit from June 2020 to May 2021 in accordance with generally accepted government auditing standards. 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 audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

⁵GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 10, 2014).

⁶We received data from the Army Contracting Command - Detroit Arsenal, but did not receive Army-wide data and therefore excluded the Army from this report.

Background

Regulations and Guidance on Obtaining Certified Cost or Pricing Data

The Federal Acquisition Regulation (FAR) requires contracting officers to determine if prices proposed by contractors are fair and reasonable before awarding contracts.⁷ Contracting officers can determine if prices are fair and reasonable using different processes. For example, when contracts are awarded competitively, contracting officers can compare prices offered and use other data and techniques to determine their reasonableness. When contracts are awarded non-competitively, contracting officers can award, with appropriate justification, the contracts on a sole-source basis. For sole-source contracts with a dollar value expected to be above the Truthful Cost or Pricing Data threshold, contracting officers are required to obtain certified cost or pricing data to determine if offered prices are fair and reasonable.⁸

The Truthful Cost or Pricing Data statute also provides several exceptions to the requirement to obtain certified cost or pricing data, including:

- If the contracting officer determines that there is adequate price competition;⁹

⁷This scope of this report does not include awards made using sealed bidding; however, under FAR Part 14, any bid may be rejected if the contracting officer determines in writing that it is unreasonable as to price, and the government may cancel the invitation for bids. FAR 14.404-2; FAR 14.404-1.

⁸The Truthful Cost or Pricing Data statute, as implemented through the FAR, requires that for contracts exceeding a certain dollar threshold awarded on a noncompetitive basis, the contractor must provide cost or pricing data that the contractor certifies as accurate, current, and complete. If, after award, the certified cost or pricing data are found to be inaccurate, incomplete, or noncurrent as of the date of final agreement on price or an earlier date agreed upon by the parties given on the contractor's or subcontractor's Certificate of Current Cost or Pricing Data, the government is entitled to a price adjustment, including profit or fee, of any significant amount by which the price was increased because of the defective certified cost or pricing data. See 10 U.S.C. § 2306a, 41 U.S.C. § 3502 and FAR 15.407-1.

⁹For DOD, adequate price competition occurs when two or more responsible offerors, competing independently, submit priced offers that satisfy the government's expressed requirement; award will be made to the offeror whose proposal represents the best value where price is a substantial factor in source selection; and there is no finding that the price of the otherwise successful offeror is unreasonable. Any finding that the price is unreasonable must be supported by a statement of the facts and approved at a level above the contracting officer. FAR 15.403-1(c)(1). Best value means the expected outcome of an acquisition that, in the government's estimation, provides the greatest overall benefit in response to the requirement. FAR 2.101.

-
- If the contract is for a commercial item;¹⁰ or
 - If the Head of Contracting Activity (HCA) waives, in writing, the requirement for certified cost or pricing data. For example, if the contractor provided certified cost or pricing data on previous contracts, and the contracting officer determines such data are sufficient when combined with updated data, the HCA may grant a waiver. The HCA is the official who has the overall responsibility for managing the contracting activity, including the authority to approve contracts for award when necessary.¹¹

When certified cost or pricing data are not required, the FAR prohibits contracting officers from obtaining certified cost or pricing data and requires that they obtain data other than certified cost or pricing data from the contractor to the extent necessary to determine the reasonableness of the proposed prices offered.¹² Data other than certified cost or pricing data may include identical types of data as certified cost or pricing data, but without the certification. Examples of cost or pricing data include labor or material costs, or catalog prices and invoices of recent sales to government and nongovernmental entities.

When a contractor refuses to provide data other than certified cost or pricing data, the DFARS and associated Procedures, Guidance, and Information (PGI) outlines the process for DOD's contracting officers to take. These steps include:

- Elevating the issue to the contracting activity management to try and resolve the issue with the contractor,
- Elevating the issue to the HCA if the contracting officer is recommending that the HCA approve the contract for award without data that are other than certified cost or pricing data because it is in the best interest of the government to do so,

¹⁰An item is commercial if it is of a type that already exists in the commercial market or requires minor modifications to meet the government's needs. See FAR 2.101 for a complete definition of commercial item.

¹¹Contracting activity for DOD means offices designated by the director of a defense agency, which has been delegated contracting authority through its agency charter. Examples of DOD contracting activities are DLA Land and Maritime and Naval Air Systems Command. See DFARS PGI 202.101 for other contracting activities.

¹²The contracting officer is to use data available from the government or other secondary sources before going to the contractor. FAR 15.403-3.

- Developing a plan to mitigate the situation in the future, and
- Documenting the refusal of the contractor to provide the requested cost or pricing data in the Contractor Performance Assessment Reporting System (CPARS), which is the government-wide database for collecting contractor performance information.¹³

Further, DPC has required DOD components, including the military departments and DLA, to report information on commercial items exceptions, waivers, and contractors' refusals to provide data (see table 1).

Table 1: Department of Defense (DOD) Reporting Requirements Related to Cost or Pricing Data

Reporting office	Content to be reported	Minimum contract action dollar value for reporting	Frequency	Start date of reporting requirement	End date of reporting requirement
DOD components report to Defense Pricing and Contracting (DPC)	Exceptions to the requirement to provide certified cost or pricing data for contract awards subject to the Truthful Cost or Pricing Data statute based on the determination that the items to be acquired were commercial items. ^a	19.5 million ^b	Annually	November 2003	June 2020
DOD components report to DPC	Instances in which the Head of Contracting Activity (HCA) waived the requirement to provide certified cost or pricing data. ^c	20 million ^b	Annually	November 2003	Ongoing
HCA Report to DPC	Instances when a contractor has denied a request made by a contracting officer for data other than certified cost or pricing data and that the contracting officer has elevated to the HCA. ^d	None	Quarterly	March 2019	Ongoing

Source: GAO analysis of DOD documents. | GAO-21-388

^aThe Truthful Cost or Pricing Data threshold was \$750,000 or greater if awarded on or before June 30, 2018; the threshold was increased to \$2 million or greater if awarded on or after July 1, 2018. 10 U.S.C. § 2306a and 41 U.S.C. § 3502. DOD was also required to report the exceptions to Congress from 2003 until the requirement was repealed pursuant to the National Defense Authorization Act for Fiscal Year 2018 Pub. L. 115-91 § 1051 (2017). DOD implemented Section 1051 in the Defense Federal Acquisition Regulation Supplement (DFARS) on June 5, 2020.

¹³See DFARS PGI 215.404-1 for the steps that DOD contracting officers follow when a contractor refuses to provide data other than certified cost or pricing data. The HCA is to base the award decision on efforts to obtain data other than certified cost or pricing data, need for the item, and potential for increased cost or harm to the government if the award is not made. FAR 15.403-3.

^bThe reporting threshold prior to October 1, 2015 was \$15 million; from October 1, 2015 to September 29, 2020 it was \$19.5 million.

^cSee DFARS 215.403-1. DOD was also required to report these waivers to Congress until December 12, 2017.

^dSee DFARS Procedures, Guidance, and Information 215.403-3. The reporting requirement was initially implemented by the Under Secretary of Defense for Acquisition and Sustainment's April 25, 2019 memorandum.

DPC implemented the reporting requirement for refusals in March 2019 through a department-wide memorandum, which noted the importance of having a holistic view of the extent of problems across DOD of contractors failing to comply with contracting officer requests for data other than certified cost or pricing data adequate to support price reasonableness determinations. DPC noted in the memorandum that the data would help to identify “chronic issues” regarding contractors’ refusals to provide the information and determine whether it was necessary to pursue statutory or regulatory changes to address the problems.

Prior GAO and DOD Inspector General Reports

Over the past 6 years, GAO has issued several reports that assessed DOD’s efforts to obtain cost or pricing data from contractors, its process for determining whether an item met the definition of a commercial item, and its efforts to reduce the length of time to award contracts. For example:

- In August 2015, we reviewed DOD’s actions to develop guidance and training on determining price reasonableness, and the circumstances under which DOD requested cost or pricing data.¹⁴ Overall, we found that contracting officials faced challenges when determining price reasonableness due to concerns about how current the data were and contractors’ reluctance to share data. We also found that DOD issued guidance to contracting officers on how to determine the price reasonableness for commercial items; planned to revise the DFARS on requesting cost or pricing information from contractors; and was developing training and establishing a cadre of cost and pricing experts to assist contracting officers. We did not make any recommendations in this report.
- In July 2018, we reported on the factors that influenced DOD’s commercial item and price reasonableness determinations.¹⁵ We

¹⁴GAO, *Defense Contracts: DOD’s Requests for Information from Contractors to Assess Prices*, [GAO-15-680](#) (Washington, D.C.: Aug. 12, 2015).

¹⁵GAO, *Defense Contracts: Improved Information Sharing Could Help DOD Determine Whether Items Are Commercial and Reasonably Priced*, [GAO-18-530](#) (Washington, D.C.: July 31, 2018).

found four interrelated factors that influenced how and whether DOD determined if an item was commercial and if its price was reasonable. These factors included available information about the item in the commercial market, DOD contracting officers' ability to obtain contractor data, extent of DOD-specific modifications to the item, and reliability of prior commercial item determinations. In the case studies we reviewed, most contractors provided relevant information to DOD, but not without delays and challenges. We also found that DOD had taken initial steps to share more information across the department to inform commercial item determinations, but that DOD did not have a comprehensive information sharing strategy. DOD concurred with our recommendation to develop a strategy for how information related to commercial item and price reasonableness determinations should be shared across the department. In December 2018, DOD took several actions, including designating that the Defense Contract Management Agency Commercial Item Group would serve as the determining office for all commercial item review requests submitted to the Defense Contract Management Agency.¹⁶

- In July 2018, we also reported that DOD proposed reducing the time it takes to award contracts related to weapon systems but had a limited understanding DOD-wide of how long it took between issuing the solicitation and awarding the contract.¹⁷ We found that the time from solicitation issuance to contract award ranged from less than 1 month to over 4 years. According to DOD contracting officials, the factors that reduced or lengthened the time it took included how quickly contractors responded to requests for additional information after initial proposals were received. DOD concurred with our recommendation to develop a strategy that identified the information it needed to collect and assess contract award timeframes. In February 2019, DOD issued a memorandum requiring the DOD components to track and report contract milestones for major defense acquisition

¹⁶DFARS 212.102(a)(i) and DFARS PGI 212.102(a)(i) provide directions for documenting and uploading commercial item determinations over \$1 million and advises contracting activities how to request assistance from the Defense Contract Management Agency Commercial Item Group.

¹⁷GAO, *Defense Contracts: DOD Should Develop a Strategy for Assessing Contract Award Time Frames*, [GAO-18-467](#) (Washington, D.C.: July 16, 2018).

programs over \$250 million, beginning with noncompetitive procurements.¹⁸

Additionally, in February 2019, the DOD Inspector General reported on whether DOD purchased spare parts at fair and reasonable prices from a contractor, TransDigm Group, Inc., which produces spare parts for aircraft and airframes.¹⁹ The Inspector General determined that TransDigm earned excess profit on spare parts purchased by the DLA and the Army, even though contracting officers followed the FAR and DFARS procedures when determining if the proposed prices were fair and reasonable. The Inspector General recommended, among other measures, that DPC:

- examine relevant laws and guidance related to the acquisition process to determine what changes were needed, if any, to ensure that contracting officers could obtain data other than certified cost or pricing data when requested;
- expand an existing reporting requirement regarding “exclusive distributors or dealers” refusals to provide cost or pricing data to all contractor refusals;
- incorporate the expanded reporting requirements into the DFARS and the DFARS PGI; and
- establish a team of functional experts to analyze parts and contractors deemed to be at high risk for unreasonable pricing.

In response to the recommendations, DPC reviewed relevant laws and guidance, and among other actions, proposed legislative changes in April 2020 that, according to DOD, would enhance its ability to obtain data other than certified cost or pricing data. DPC expanded its reporting requirement in March 2019 from distributor or dealer refusals to all contractor refusals to provide data other than certified cost or pricing data and incorporated the requirement into DFARS PGI in May 2019. DPC also established a team of pricing experts to identify and share

¹⁸Major defense acquisition programs are certain DOD acquisition programs as defined by 10 U.S.C. § 2430 and DOD Instruction 5000.85, Major Capability Acquisition (Aug. 6, 2020).

¹⁹DOD Inspector General, *Review of Parts Purchased From TransDigm Group, Inc.*, DODIG-2019-060 (Alexandria, VA: Feb. 25, 2019).

information on contractors deemed to be at high risk for unreasonable pricing in April 2019.

DLA Obtained Data Other than Certified Cost or Pricing Data to Determine Price Reasonableness for a Majority of Its Sole-Source Spare Parts Awards

During fiscal years 2015 to 2019, DLA awarded most of its contracts for spare parts competitively, but in instances in which DLA could not rely on adequate price competition to determine if prices were fair and reasonable, it obtained cost or pricing data to determine the reasonableness of proposed prices. Overall, DLA awarded 136 sole-source contracts for spare parts above the applicable Truthful Cost or Pricing Data threshold over the 5-year period (see table 2).

Table 2: Defense Logistics Agency Spare Parts Contracts Greater than the Truthful Cost or Pricing Data Thresholds for Fiscal Years 2015 to 2019

	October 1, 2014 through June 30, 2018	July 1, 2018 through September 30, 2019	Total
Truthful Cost or Pricing Data threshold ^a	750,000 dollars	2 million dollars	
Type of award	Number of contracts	Number of contracts	Number of contracts
Competitive	268	22	290
Sole-source ^b	114	22	136
Total	382	44	426

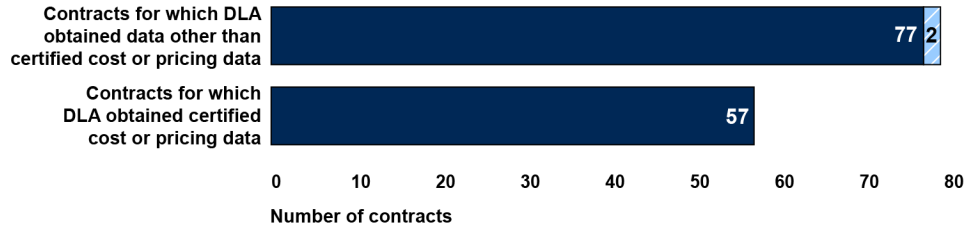
Source: GAO analysis of data from Defense Logistics Agency and the Federal Procurement Data System-Next Generation (FPDS-NG). | GAO-21-388


^aThe Truthful Cost or Pricing Data threshold applies to the expected price of the contract before award. It also applies to the expected price of contract changes, modifications, and subcontracts. See 10 U.S.C. § 2306a.

^bFor the purposes of this report, we refer to sole-source contracts as those awarded using other than full and open competition, including those coded as “unique source” or “only one source-other” in FPDS-NG. See Federal Acquisition Regulation 6.302-1(a)(2) and 6.302-1(b)(1).

These 136 sole-source spare parts contracts had a total approximate value of \$7.9 billion. Seventy-seven contracts (or about 57 percent) were for commercial items. As a result, DLA determined that the contractor was exempt from the statutory requirement to provide certified cost or pricing data, and DLA obtained data other than certified cost or pricing data instead. For the remaining 59 contracts, DLA determined that it was required to obtain certified cost or pricing data and did so in 57 cases. However, for two contracts, DLA issued waivers to enable DLA to award the contracts using data other than certified cost or pricing data, citing an exceptional need for the spare parts (see fig. 1).

Figure 1: Type of Cost or Pricing Data Obtained by the Defense Logistics Agency (DLA) on Sole-Source Spare Parts Contracts Awarded during Fiscal Years 2015 to 2019, Subject to the Truthful Cost or Pricing Data Statute



 Contracts for which DLA waived the requirement for certified cost or pricing data

Source: GAO analysis of data from Defense Logistics Agency and the Federal Procurement Data System-Next Generation. | GAO-21-388

Notes: The Truthful Cost or Pricing Data threshold was \$750,000 or greater if awarded on or before June 30, 2018 and is \$2 million or greater if awarded on or after July 1, 2018, 10 U.S.C. § 2306a and 41 U.S.C. § 3502. For the purposes of this report, we refer to sole-source contracts as those awarded using other than full and open competition, including those coded as “unique source” or “only one source-other” in the Federal Procurement Data System-Next Generation. See Federal Acquisition Regulation 6.302-1(a)(2) and 6.302-1(b)(1).

The circumstances behind the two sole-source contracts for which DLA waived the requirement for the contractor to submit certified cost or pricing data—instead relying on data other than certified cost or pricing data—were as follows.

- For a \$36.6 million contract for power distribution equipment, the DLA HCA approved the waiver because data other than certified cost or pricing data, such as past prices, could be used to determine price reasonableness.
- For a \$1.9 million contract for motor vehicle parts, the DLA HCA approved the waiver, since the contract award date was projected to be after the Truthful Cost or Pricing Data threshold would be increased to \$2 million.

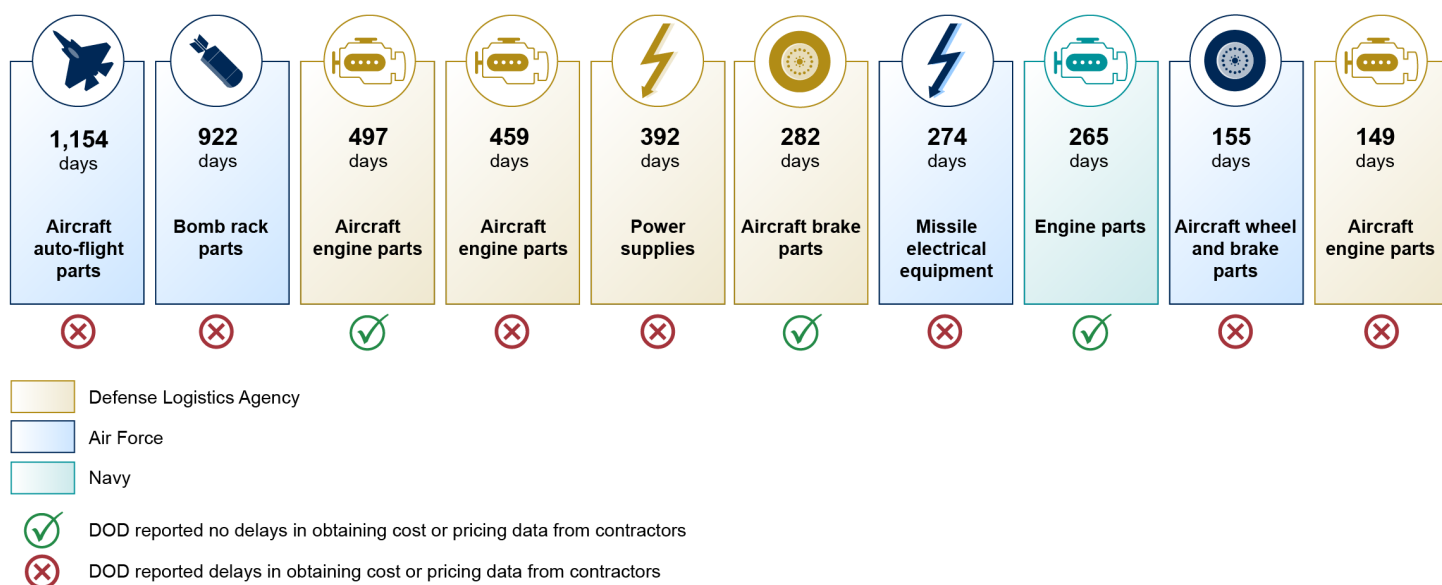
DOD Is Not Tracking Delays in Obtaining Contractors’ Cost or Pricing Data

DPC’s March 2019 memorandum and associated DFARS PGI outline the process that contracting officers are to follow for elevating outright refusals to provide cost or pricing data to their HCAs, and in turn, reporting these instances to DPC. DPC is in the process of compiling information collected from DOD components on refusals and expects to issue its initial report to Congress later this year. DPC officials told us, however, that this reporting requirement is for refusals only, and it will not capture information when contracting officers experience long delays in

obtaining the requested data and reasons for those delays.²⁰ Hence, the report will not provide DPC a holistic, enterprise-wide understanding of the difficulties in obtaining cost or pricing data, as called for in its March 2019 memorandum.

DLA, Air Force, and Navy contracting officials told us that they generally experience delays in obtaining cost or pricing data. DOD reported delays—but no outright refusals—as one of the factors contributing to the time needed to award seven of the 10 sole-source spare parts contracts that we reviewed from fiscal year 2019. The number of days from the solicitation to contract award for these 10 contracts ranged from 149 to 1,154 days (see fig. 2).

Figure 2: Number of Days from Solicitation to Award for 10 Selected Contracts for Fiscal Year 2019



Source: GAO analysis of Department of Defense (DOD) contract documents and interviews with agency officials. | GAO-21-388

Contracting officers identified various factors that contributed to the delays in obtaining the cost or pricing data, including that the contractors:

²⁰Contracting officers are required to report denials of requests for data other than certified cost or pricing data that are not resolved through the elevation process at DFARS PGI 215.404-1 (a)(i)(A), and therefore, require an HCA determination that it is in the best interest of the government in order to make award to that offeror.

-
- needed time to develop cost or pricing data for parts out of production;
 - delayed submitting proposals with adequate cost or pricing data;
 - had difficulty obtaining subcontractors' cost or pricing data; and
 - would not provide access to unredacted commercial invoices.

In all cases, the contracting officers were able to determine whether the offered prices were fair and reasonable, but had to take additional time to find alternative approaches using available information. The following examples describe some of the challenges that the contracting officers experienced and the actions taken to address them:

- In a \$157.7 million sole-source contract for helicopter engine parts, DLA officials told us that they experienced delays obtaining certified cost or pricing data to support proposed labor and material costs because the engine had been out of production for approximately 30 years. Contractor representatives said that they needed additional time to find subcontractors that were technically capable of producing the parts, update design drawings, and obtain new machinery to produce the parts, which contributed to the delay. DLA worked with the contractor to obtain the requested certified cost or pricing data, but DLA officials stated that it took more than 10 months to do so, with extensive back and forth occurring during the negotiation process. Overall, it took 459 days, measured from when the solicitation was issued, to award the contract due to the delay in obtaining data and other pricing issues. Once the government received the requested certified cost or pricing data, it was able to negotiate a final price that was about 25 percent less than the contractor's initial proposed price.
- In a \$5.9 million sole-source commercial contract for spare auto-throttle and auto-pilot parts for a cargo plane, the Air Force contracting officer requested that the contractor provide data other than certified cost or pricing data—specifically invoices of recent sales to commercial buyers—to verify that the contractor's proposed prices were in line with the prices paid by its commercial buyers. Contractor representatives offered to provide invoices that had the buyer's information redacted and to attest to the fact that the redacted invoices were for buyers outside government, but the Air Force contracting officer noted that this was not sufficient to determine that the buyers were commercial firms. After more than 120 days of discussions, the contractor allowed the Air Force to view the unredacted invoices at the contractor's office. Subsequently, the Air Force negotiated a price that was about 5 percent less than the proposed price.

-
- In a \$4.3 million sole-source contract for bomb rack spare parts for an aircraft, Air Force officials stated they did not obtain an adequate proposal for more than 450 days after issuing the solicitation. They then experienced further delays receiving the needed certified cost or pricing data to determine if the proposed price was fair and reasonable. Contractor representatives told us that they needed additional time to source the components needed to manufacture the parts since the parts were no longer being produced. Air Force contracting officials said that they communicated these difficulties within their management, which then worked with the contractor's leadership to obtain the data. As a result of the delays, however, the need became urgent, and the Air Force paid about 5 percent more than the contractor proposed to avoid grounding the aircraft due to insufficient spares. Overall, it took a total of 922 days to award the contract.
 - In a \$3.0 million sole-source contract for aircraft engine parts, the exclusive distributor of the parts experienced difficulty obtaining certified cost or pricing data from the parts' supplier. The DLA contracting officer communicated the issue to management, but was unable to obtain the requested data. To establish initial prices for negotiations with the contractor, in the absence of certified cost or pricing data, the DLA contracting officer relied on an analysis by DLA's Value Management and Engineering Division. The DLA contracting officer eventually received the requested data to determine if offered prices were fair and reasonable, and awarded the contract 149 days after issuing the solicitation.

The PGI requires contracting officers to document the refusal of a contractor to provide the requested data other than certified cost or pricing data in CPARS. However, contracting officers told us that they would not record delays in obtaining the data, in part because CPARS is intended to capture performance after the contract is awarded. Consistent with this perspective, our review of the most recent CPARS submissions of these seven contracts found that none mentioned delays in obtaining cost or pricing data.

In three of the 10 cases, the contracting officer told us that they received the requested cost or pricing data in what they considered a timely manner to determine if offered prices were fair and reasonable. For example, in a DLA sole-source contract for aircraft brake parts, the contracting officer noted that the contractor provided data other than certified cost or pricing data, such as commercial invoices and commercial sales history, along with their proposal. In all three cases, the

contracting officers were able to determine the reasonableness of the proposed prices without further delay.

DPC, DLA, and military department officials told us that the delays in obtaining requested cost or pricing data for the sole-source spare parts contracts we identified in our case studies are similar to delays they experience more generally on sole-source contracts department-wide. HCAs, senior contracting officials, and the contracting officers we interviewed told us that contracting officers are expected to work through the delays and resolve issues at the lowest level possible. Further, these officials told us that contracting officers are empowered to take various actions to obtain cost or pricing data, such as continuing to work with the contractor to obtain requested cost or pricing data or use different cost or pricing data. DPC officials agreed, however, that having better department-wide visibility on the delays in obtaining cost or pricing data and the reasons for those delays would be beneficial to address common challenges that contracting officials experience. DPC officials noted that obtaining such information may require a manual data call, which they noted is burdensome and may not provide complete information. These officials noted they would need to determine if various contracting information systems used by DLA and the military departments could help provide information on delays. Further, DPC officials noted that they would also need to define key terms, such as what constituted a reportable delay.

Nevertheless, without a means to monitor or identify delays in obtaining cost or pricing data and the nature of those delays, DOD is not collecting data that would provide, as called for in its March 2019 memorandum, a holistic view of the extent of problems across DOD of contractors failing to comply with contracting officer requests for data other than certified cost or pricing data. Consequently, DOD is missing opportunities to identify approaches to effectively address the factors contributing to those delays and award contracts faster. Federal internal control standards state that management should obtain relevant data from internal and external sources in a timely manner based on the information requirements to make informed decisions and evaluate their performance in achieving key objectives and addressing risks.²¹

²¹GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 10, 2014).

Conclusions

DOD spends billions of dollars annually on sole-source spare parts contracts to keep its helicopters, planes, and other weapons systems operating. Since 2015 we have consistently reported that contracting officers face challenges obtaining cost or pricing data from contractors, contributing to delays in determining whether the proposed prices are fair and reasonable, and ultimately, delays in awarding the contracts. We found these challenges are not limited to DLA and spare parts, but occur department-wide and affect contracts of all dollar values.

DPC has established reporting mechanisms when contractors outright refuse to provide cost or pricing data, but this reporting does not tell the whole story or provide enough information to help address the challenges in obtaining cost and pricing data. Establishing a process to track delays in obtaining this data—whether as an in-process early warning system to alert HCAs or command management as to challenges being experienced by their contracting officers or as a means to help identify common challenges after the contracts are awarded—would provide DOD opportunities to better understand the extent of delays in determining price reasonableness, the factors contributing to those delays, and help reduce the time to award contracts at prices contracting officers determine are fair and reasonable. Determining the best approach to collecting this data, however, requires that DOD assess what information could be obtained from existing systems versus relying on manual data calls, as it does currently for its reports on outright refusals.

Recommendation for Executive Action

We are making one recommendation to the Under Secretary of Defense for Acquisition and Sustainment:

The Under Secretary of Defense for Acquisition and Sustainment should direct the Principal Director, Defense Pricing and Contracting, to identify options for collecting additional information on the extent and nature of delays that contracting officers experience in obtaining cost or pricing data for sole-source spare parts contracts. (Recommendation 1)

Agency Comments and Our Evaluation

We provided a draft of this report to DOD for review and comment. In its comments, reproduced in appendix II, DOD concurred with the recommendation. In its response, DOD stated that DPC plans to establish a working group to identify options for collecting additional information on the extent and nature of delays that contracting officers experience in obtaining cost or pricing data for sole-source spare parts contracts. DOD also provided technical comments, which we incorporated as appropriate.

We are sending copies of this report to the appropriate congressional committees; the Secretary of Defense; the Under Secretary of Defense for Acquisition and Sustainment, and the Principal Director, Defense Pricing and Contracting. In addition, the report will be available at no charge on GAO's website at <https://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-4841 or DinapoliT@gao.gov. Contact points for our offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix III.

A handwritten signature in black ink, appearing to read "Timothy J. DiNapoli". The signature is fluid and cursive, with the first name "Timothy" and last name "DiNapoli" clearly legible.

Timothy J. DiNapoli
Director, Contracting and National Security Acquisitions

List of Committees

The Honorable Jack Reed
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The Honorable James M. Inhofe
Ranking Member
Committee on Armed Services
United States Senate

The Honorable Gary C. Peters
Chairman
The Honorable Rob Portman
Ranking Member
Committee on Homeland Security and Governmental Affairs
United States Senate

The Honorable Jon Tester
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The Honorable Richard Shelby
Ranking Member
Subcommittee on Defense
Committee on Appropriations
United States Senate

The Honorable Adam Smith
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The Honorable Mike Rogers
Ranking Member
Committee on Armed Services
House of Representatives

The Honorable Carolyn Maloney
Chairwoman
The Honorable James Comer
Ranking Member
Committee on Oversight and Reform
House of Representatives

The Honorable Betty McCollum
Chair
The Honorable Ken Calvert
Ranking Member
Subcommittee on Defense
Committee on Appropriations
House of Representatives

Appendix I: Objectives, Scope, and Methodology

Section 804 of the National Defense Authorization Act (NDAA) for Fiscal Year 2020 included a provision for us to review the Department of Defense's (DOD) efforts to obtain cost or pricing data from contractors to determine the reasonableness of proposed prices before contracts are awarded.¹ This report (1) describes how often the Defense Logistics Agency (DLA) obtained cost or pricing data to determine the reasonableness of prices for sole-source spare parts contracts awarded during fiscal years 2015 to 2019; and (2) assesses the extent to which DOD is tracking delays in obtaining contractors' cost or pricing data and the reasons for those delays for sole-source spare parts contracts during fiscal year 2019.²

To describe how often DLA obtained cost or pricing data for sole-source spare parts contract awards, we obtained DLA-reported contract data for spare parts during fiscal years 2015 to 2019 (the latest year with complete contract data at the time we began our review). We matched the DLA data with information obtained from the Federal Procurement Data System–Next Generation (FPDS–NG) to determine which contracts were sole-source and had award values, including unexercised options, greater than the applicable Truthful Cost or Pricing Data dollar thresholds.³ The thresholds are \$750,000 or greater if awarded on or before June 30, 2018 and \$2 million or greater if awarded on or after July 1, 2018. For these sole-source contracts, we used FPDS-NG to determine which contracts used commercial item acquisition procedures where an exception to the requirement for certified cost or pricing data applies, and contracting officers can rely on data other than certified cost or pricing data to determine if prices are fair and reasonable. We also used FPDS-NG to determine which contracts had waivers to the requirement to obtain certified cost or pricing data. We electronically tested the contract data from FPDS-NG and verified the information with

¹National Defense Authorization Act for Fiscal Year 2020, Pub. L. No. 116-92, § 804 (2019).

²For the purposes of this report, we refer to sole-source contracts as those awarded using other than full and open competition, including those coded as “unique source” or “only one source-other” in the Federal Procurement Data System-Next Generation (FPDS-NG). See Federal Acquisition Regulation (FAR) 6.302-1(a)(2) and 6.302-1(b)(1). Contractors must submit certified cost or pricing data unless an exception applies, such as a waiver to the requirement to submit such data for contracts that are estimated to be above the Truthful Cost or Pricing Data threshold of \$750,000 or greater if awarded on or before June 30, 2018 and \$2 million or greater if awarded on or after July 1, 2018. 10 U.S.C. § 2306a and 41 U.S.C. § 3502.

³FPDS-NG is the government's online repository for contracting data.

DLA, and determined that the data from FPDS–NG were sufficiently reliable for the purposes of determining the following characteristics of DLA spare parts contract awards: value at the time of award, requirement for certified cost or pricing data, and award on a sole-source or competitive basis.

To assess the extent to which DOD tracks delays related to obtaining contractors' cost or pricing data and reasons for any delays, we reviewed the Defense Federal Acquisition Regulation Supplement (DFARS) and Defense Pricing and Contracting's (DPC) March 2019 memorandum for actions that contracting officers are required to take when contractors refuse to provide cost or pricing data, including reporting the refusal to DPC. DPC is the office responsible for pricing, contracting, and procurement policies at DOD and, organizationally, reports to the Under Secretary for Acquisition and Sustainment. We also reviewed applicable sections on obtaining cost or pricing data from the Truthful Cost or Pricing Data statute; Federal Acquisition Regulation; and DFARS Procedures, Guidance, and Information, as well as DOD and DLA guidance; and verified that the Air Force and Navy did not have additional guidance. We assessed DPC's process for tracking refusals against GAO's internal control principle that management obtains relevant data from reliable internal and external sources in a timely manner based on the identified information requirements to achieve the entity's objectives.⁴

For fiscal year 2019, DLA, Air Force, and Navy identified a total of 37 sole-source contracts for spare part contracts greater than \$2 million (the applicable Truthful Cost or Pricing Data threshold for which certified cost or pricing data are required).⁵ We used FPDS-NG to confirm the following characteristics of the 37 contract awards against the data that DLA, Air Force, and Navy provided: value at the time of award, requirement for certified cost or pricing data, and award on a sole-source basis. We electronically tested the contract data from FPDS-NG and verified the information with DOD contract documents, and determined that the data from FPDS–NG were sufficiently reliable for our purposes. We received contract data from the Army Contracting Command - Detroit Arsenal, but

⁴GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 10, 2014).

⁵DLA Aviation, DLA Land and Maritime, and DLA Troop Support provided contract data for DLA. Air Force Sustainment Center provided contract data for the Air Force. Department of the Navy, Naval Air Systems Command, Naval Information Warfare Systems Command, Naval Supply Systems Command, Navy Strategic Systems Programs, and United States Marine Corps provided contract data for the Navy.

did not receive Army-wide contract data. Therefore, we excluded the Army from this report.

From the 37 contracts for fiscal year 2019 from the DLA, Air Force, and Navy, we selected 10 contracts to review as non-generalizable case studies to learn more about the reasons for delays in obtaining cost or pricing data. We identified at least one contract award from each department based on the number of days between solicitation and award dates, and contract award values. We analyzed the contract documents, such as the solicitation, contract, and the price negotiation memorandum, pertaining to the determination if prices were fair and reasonable for all 10 contracts. To obtain contractors' perspectives on delays and reasons for delays in providing cost or pricing data to contracting officers, we interviewed three of the contractors from the 10 contracts that we selected as case studies. We selected the contractors based on the highest number of days between solicitation and award dates. See Table 3 for a summary of the information that we received from DLA, Air Force, and Navy, and the contracts we reviewed in depth.

Table 3: Defense Logistics Agency (DLA), Air Force, and Navy Spare Parts Sole-Source Contracts for Fiscal Year 2019, Greater than \$2 Million

Department	Number of contract awards	Selected contracts
DLA	16	5
Air Force	16	4
Navy	5	1
Total	37	10

Source: GAO analysis of Federal Procurement Data System-Next Generation (FPDS-NG) and Department of Defense contract data. | GAO-21-388

Note: For the purposes of this report, we refer to sole-source contracts as those awarded using other than full and open competition, including those coded as "unique source" or "only one source-other" in FPDS-NG. See Federal Acquisition Regulation 6.302-1(a)(2) and 6.302-1(b)(1).

For selected contracts where DOD reported delays, we reviewed the available performance evaluations from the Contractor Performance Assessment Reporting System. The Contractor Performance Assessment Reporting System is the government-wide database for collecting contractor performance information.

To supplement our work for both objectives of the report, we interviewed officials from DPC, and contracting offices and Head of Contracting Activity offices for DLA, Air Force, and Navy. In addition, we reviewed relevant GAO and DOD Inspector General reports related to cost or

pricing data to better understand past issues with obtaining cost or pricing data and DOD's efforts to reduce the time that it takes to award contracts.

We conducted this performance audit from June 2020 to May 2021 in accordance with generally accepted government auditing standards. 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 audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix II: Comments from the Department of Defense



ACQUISITION
AND SUSTAINMENT

THE UNDER SECRETARY OF DEFENSE
3010 DEFENSE PENTAGON
WASHINGTON, DC 20301-3010

Mr. Timothy J. DiNapoli
Director, Contracting and National Security Acquisitions
U.S. Government Accountability Office
441 G Street, NW
Washington DC 20548

Dear Mr. DiNapoli:

This is the Department of Defense (DoD) response to Government Accountability Office (GAO) Draft Report, GAO-21-388, "SPARE PARTS CONTRACTS: Collecting Additional Information Could Help DOD Address Delays in Obtaining Cost or Pricing Data," dated May 2021 (GAO Code 104409).

DoD concurs with GAO's recommendation, provided in the enclosure. My point of contact is Ms. Leslie Overturf who can be reached at leslie.j.overturf.civ@mail.mil.

Sincerely,

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for

John M. Tenaglia
Principal Director,
Defense Pricing and Contracting

Enclosure:
As stated

Enclosure

**GAO DRAFT REPORT DATED MAY 1, 2021
GAO-21-388 (GAO CODE 104409)**

**“SPARE PARTS CONTRACTS: COLLECTING ADDITIONAL INFORMATION COULD
HELP DOD ADDRESS DELAYS IN OBTAINING COST OR PRICING DATA”**

**DEPARTMENT OF DEFENSE COMMENTS
TO THE GAO RECOMMENDATION**

RECOMMENDATION 1: The GAO recommends that the Under Secretary of Defense for Acquisition and Sustainment should direct the Principal Director, Defense Pricing and Contracting, to identify options for collecting additional information on the extent and nature of delays that contracting officers experience in obtaining cost or pricing data for sole-source spare parts contracts.

DoD RESPONSE: DoD concurs. Defense Pricing and Contracting will establish a working group of representatives from across the department to identify options for collecting additional information on the extent and nature of delays that contracting officers experience in obtaining cost or pricing data for sole-source spare parts.

Appendix III: GAO Contact and Staff Acknowledgments

GAO Contact

Timothy J. DiNapoli, (202) 512-4841 or DiNapoliT@gao.gov

Staff Acknowledgments

In addition to the contact name above, Penny Berrier (Assistant Director), James Kim, TyAnn Lee, Leigh Ann Haydon, Laura Abendroth, Rose Brister, Roxanna Sun, Anne Louise Taylor, Julia Kennon, Breanne Cave, and John Bumgarner made key contributions to this report.

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