U.S. Government Accountability Office

National Transportation Safety Board: Use of Competitive and Noncompetitive Contract Awards to Acquire Products and Services

GAO-26-108506
Q&A Report to Congressional Committees
July 21, 2026

Why This Matters

The National Transportation Safety Board (NTSB) is an independent establishment of the U.S. government that plays a vital role in advancing transportation safety. Specifically, NTSB investigates and determines the probable cause of transportation accidents, issues safety recommendations, and promotes safety improvements. NTSB is responsible for investigating every civil aviation accident in the United States and certain significant events in other modes of transportation—railroad, highway, marine, pipeline, and commercial space. To support its mission, NTSB procures a variety of products, such as laboratory equipment, and services, such as information technology services, to develop and maintain systems and applications used to investigate and establish the probable causes of accidents.

According to NTSB's reported data, in fiscal year 2024, NTSB obligated approximately $22.5 million on contract awards. Under federal law, agencies, including independent establishments like NTSB, are generally required to promote full and open competition in awarding contracts, with some exceptions. However, in some circumstances, NTSB may consider other options when procuring products and services in accordance with statute, the Federal Acquisition Regulation (FAR), and NTSB's policies and procedures. Specifically, NTSB may award contracts for which all responsible sources may compete (competitively awarded contracts) or award contracts using other procedures (noncompetitively awarded contracts).[1]

The FAA Reauthorization Act of 2024 includes a provision for us to report on NTSB's procurement and contracting planning, policies, and practices, including those related to awarding noncompetitive contracts. (Pub. L. No. 118-63, § 1223, 138 Stat. 1025, 1433 (2024)). In this report, we describe the statutes, regulations, executive orders, and internal guidance that govern NTSB's procurement policies and procedures. We also describe NTSB's procedures for awarding noncompetitive contracts. In addition, we provide information on NTSB's contract obligations for fiscal year 2020 through fiscal year 2024.

Key Takeaways

- NTSB has established procedures for competitively and noncompetitively awarded contracts that include multiple levels of review, such as from NTSB's Acquisition Division and Contracting Officer. Additional senior-level reviews are required for noncompetitive contract awards valued over $100,000 and for competitive contract awards with a value over $500,000.
- For fiscal year 2020 through fiscal year 2024, NTSB obligated a total value of about $86 million on contracts, most (about $72 million) of which was for competitively awarded contracts.[2] According to NTSB officials, contract obligations were predominantly for significant upgrades to NTSB's

information technology systems, which were essential to fulfilling NTSB's mission.

- From fiscal year 2020 through fiscal year 2024, NTSB's appropriations increased from about $110 million to $140 million. According to NTSB officials, these funding increases were needed to meet NTSB's hiring and training needs, statutory mandates, and other federal government-wide mandates in a broad number of areas, such as cybersecurity, evidence and data management, information technology systems, facility security, personnel services, and records management.
- Obligations on competitively awarded contracts nearly doubled–from about $10 million in fiscal year 2020 to nearly $20 million in fiscal year 2024, while obligations on noncompetitively awarded contracts increased slightly–from about $2.5 million in fiscal year 2020 to about $2.6 million in fiscal year 2024.

What governs NTSB's policies and procedures for approving procurement requests for products and services and awarding contracts?

According to NTSB officials, the agency awards contracts pursuant to applicable statutes, federal regulations, executive orders, and internal guidance in the form of agency operations bulletins.[3]

Statutes. Statutes relevant to NTSB's contracting activities include the following:

- The Competition in Contracting Act of 1984 (the Act), as amended, generally requires executive agencies to award contracts using full and open competition, though exceptions apply.[4] The Act allows for the use of noncompetitive procedures in limited circumstances, such as when only one responsible source can meet the agency's needs, when procurement from a specified source is authorized or required by statute, when justified by national security needs or international agreement, or when there are cases of unusual and compelling urgency.[5]
- The Federal Acquisition Streamlining Act of 1994, as amended, increases the use of simplified acquisition procedures for procurements below a set threshold ($350,000 is generally the simplified acquisition threshold, as of July 2026), among other things.[6]

In addition, NTSB has statutory authority to enter into certain agreements or other transactions that are generally not subject to the FAR and to procure the temporary or intermittent services of experts or consultants, as necessary.[7] Specifically, NTSB officials stated it may use this "other transaction authority" when a traditional contract would not fulfill agency requirements (e.g., awarding funds for wreckage services to expedite actions when preserving evidence at the scene of an accident). NTSB officials said that the use of this authority requires concurrence from the Managing Director and the Office of General Counsel, based on the circumstances.

Federal regulations. NTSB must comply with the FAR, which sets forth uniform policies and procedures for contracting for all executive agencies. NTSB officials stated that the following FAR Parts have been most commonly used to procure products and services:

- FAR Part 8 (deals with prioritizing sources of supplies and services),
- FAR Part 13 (provides simplified acquisition procedures below a certain dollar threshold),
- FAR Part 12 (prescribes policies and procedures for acquiring commercial products and services),
- FAR Part 15 (provides policies and procedures governing negotiated acquisitions), and

- FAR Part 6 (prescribes policies and procedures for full and open competition and identifies those circumstances in which full and open competition is not required).

NTSB frequently awards contracts using simplified procedures under the FAR Subpart 8.4, Federal Supply Schedules, which regulates the use of the Federal Supply Schedule Program under which the General Services Administration establishes long-term, government-wide contracts with commercial firms for commercial supplies or services. These schedules provide federal agencies with a simplified process for obtaining commercial supplies and services at prices associated with volume buying.

In April 2025, an executive order was issued directing an overhaul of the FAR in two stages, including deviation guidance in phase I and a formal rulemaking in phase II (the Revolutionary FAR Overhaul). The model deviation text for the rewritten FAR Parts was issued incrementally, starting on May 2, 2025, and has continued in 2026. NTSB officials stated that the agency has not issued class deviations to adopt model deviation text from the Revolutionary FAR Overhaul and continues to use the legacy version of the FAR. NTSB is currently drafting the class deviations and plans to adopt the model deviation text by August 31, 2026.[8]

Executive order. In response to a February 2025 executive order, NTSB changed its policies to include that all new NTSB contract requirements with a value greater than $100,000 are approved by NTSB's Chairwoman prior to awarding a contract, unless approval has been delegated to NTSB's Managing Director.[9] All new contract requirements with a value less than $100,000 are approved by the Managing Director or authorized designee, with exceptions. The executive order directs agency heads to review agency contracting policies and issue guidance on new contracts, among other things.

Internal guidance. According to NTSB officials, the agency also follows its own guidance in the form of five operations bulletins on contracting policies and procedures.[10] These bulletins apply not only to the Acquisition Division—NTSB's procurement office—but also to any program office that develops procurement requests. The bulletins describe general acquisition policy and procedures; the roles of procurement professionals; and guidelines for using noncompetitive procedures, among other things.

Which NTSB officials are responsible for reviewing and approving contract awards?

According to NTSB's internal guidance, the following NTSB officials in the Acquisition Division are responsible for reviewing and approving contract awards:

- The Contracting Officer coordinates and obtains all required internal and external concurrences and approvals, ensures that all required contract documentation requirements are met, and oversees pre- and postaward contract activities. After all required reviews are complete, the Contracting Officer has authority to bind the government to the extent of the authority delegated to them, and to enter into, administer, or terminate contracts and make related determinations and findings.

- The Head of Contracting Activity (also serves as the Chief of the Acquisition Division) is responsible for the overall management of the NTSB contracting activities.

- The Senior Procurement Executive (also serves as the Chief Financial Officer) is responsible for establishing management direction for the NTSB Acquisition Program, appointing contracting officers, and providing concurrence for certain documents/actions.

- The Competition Advocate (also serves as the Deputy Managing Director) is responsible for promoting full and open competition in NTSB's acquisition of supplies and services, reviewing individual acquisition plans for competitive contracting, and promoting the procurement of commercial goods and services to meet the agency's requirements.

In addition, in response to a February 2025 executive order, NTSB changed its policies to include that all new NTSB contract requirements with a value greater than $100,000 are approved by NTSB's Chairwoman prior to awarding a contract, unless approval has been delegated to NTSB's Managing Director. All new contract requirements with a value less than $100,000 are approved by the Managing Director or authorized designee, with exceptions.

The Office of General Counsel reviews contract actions for legal sufficiency prior to the final approval of contracts, as applicable under agency policy and procedures.

Table 1 describes the NTSB's review and approval thresholds for both competitive and noncompetitive contract awards. For competitive contracts greater than $500,000, and noncompetitive contracts greater than $100,000, additional reviews and approvals above the Contracting Officer are required. According to NTSB guidance, these reviews are designed to ensure accurate funding, legal sufficiency, compliance with procurement rules, and appropriate justification for the proposed action.

Table 1: Approving Officials for National Transportation Safety Board (NTSB) Competitive and Noncompetitive Contracts, by Award Amounts

Contract award amount values, per NTSB policy	Competitive contract awards approving officials	Noncompetitive contract awards[a] approving officials
Less than, or equal to, $100,000 and above the micro-purchase threshold[b]	Contracting Officer Managing Director (or authorized designee)	Contracting Officer Managing Director (or authorized designee)
Greater than $100,000	Contracting Officer Office of General Counsel (if needed) Chairwoman, unless delegated to the Managing Director	Contracting Officer Head of Contracting Activity Senior Procurement Executive Competition Advocate Office of General Counsel Chairwoman, unless delegated to the Managing Director
Greater than $500,000	Contracting Officer Head of Contracting Activity Senior Procurement Executive Office of General Counsel Chairwoman, unless delegated to the Managing Director	Contracting Officer Head of Contracting Activity Senior Procurement Executive Competition Advocate Office of General Counsel Chairwoman, unless delegated to the Managing Director

Source: GAO analysis of NTSB information. | GAO-26-108506

[a]For all noncompetitive contract awards, a Justification for Other than Full and Open Competition is required.

[b]"Micro-purchase" means an acquisition of supplies or services using simplified acquisition procedures, the aggregate amount of which does not exceed the micro-purchase threshold, which generally is $15,000, as of July 2026. FAR 2.101. These actions generally do not require competition, so long as the contemplated price is fair and reasonable.

What are NTSB's policies and procedures for awarding contracts?

NTSB has established policies and procedures for awarding contracts that include multiple levels of review.

NTSB's process for awarding all contracts begins when a program office—for example, the Office of Aviation Safety or the Office of Highway Safety—identifies a need for a product or service and submits a procurement request to the

Acquisition Division. According to NTSB's policies and procedures, the request should provide information about the product or service needed and results of market research on potential commercial sources. The Acquisition Division reviews the request for accuracy and compliance with procedures, verifies that funding is approved, and ensures that the required documentation is included. The Acquisition Division will engage the program office to answer any questions or obtain additional information needed.

Next, the Acquisition Division will determine the procurement strategy; develop the acquisition plan, if necessary; develop the solicitation that includes evaluation criteria; publicize the requirement, if required; and solicit competitive quotes or proposals. When the solicitation closes, the Acquisition Division, with the support of the program office, will evaluate the quotes or proposals and determine an awardee, using the criteria set forth in the solicitation.

According to NTSB officials, the Contracting Officer reviews and approves contract award documentation and obtains additional reviews and approvals, as required by NTSB policy. (For required approvals, see table 1, above.)

For a noncompetitive award, the following steps also apply.

Concurrence from Acquisition Division: If the program office's market research indicates that a circumstance justifying a noncompetitive contract award has been met—such as that a good or service can only be fulfilled by a single source—the office is to confer with the Acquisition Division. Acquisition Division officials then consider whether the circumstance justifies a noncompetitive contract award or if a request for products and services can potentially be competed among many sources.

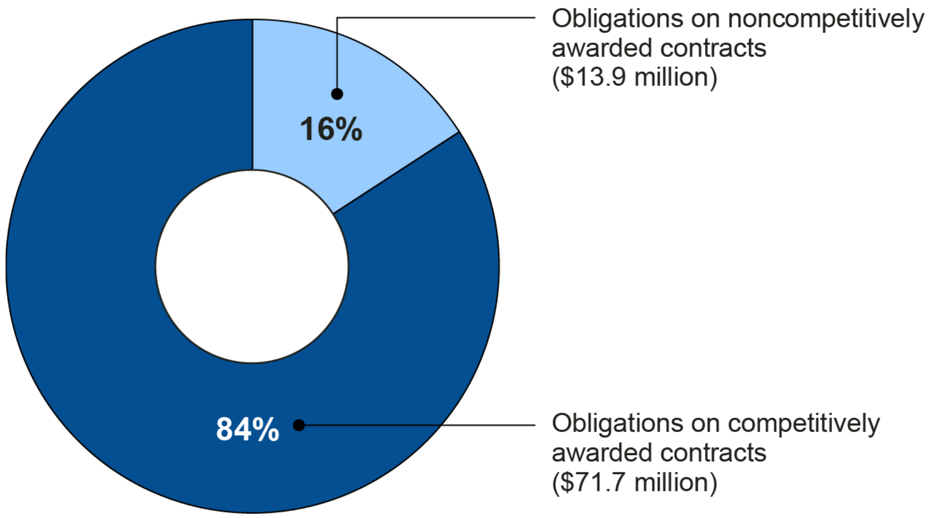
Additional documentation: Once the program office receives concurrence from the Acquisition Division, it must complete a Justification for Other than Full and Open Competition (JOFOC) document. The JOFOC identifies the statutory authority permitting other than full and open competition and describes the rationale, based on the market research and other information, to justify the use of the specific authority cited. NTSB officials stated that the Acquisition Division (1) collaborates with the program office to document the justification and rationale for restricting full and open competition; and (2) certifies that supporting data provided by the program office is complete, current, and accurate. Once the document is approved, NTSB is required by statute and the FAR to publish the notice of intent to issue a sole source contract award or the JOFOC (or both) on public federal government awards websites.[11]

Finally, for higher value contracts—greater than a value of $500,000 for competitive contract awards and greater than a value of $100,000 for noncompetitive contract awards—NTSB follows the same process but has established additional review and approval requirements, as shown in table 1 above.

How much did NTSB obligate on competitively and noncompetitively awarded contracts from fiscal year 2020 through fiscal year 2024?

NTSB obligated about $72 million on competitively awarded contracts and about $14 million on noncompetitively awarded contracts, for a total of about $86 million from fiscal year 2020 through fiscal year 2024 (see fig. 1). (All obligation amounts were adjusted for inflation to fiscal year 2024 dollars.) Fiscal year 2024 data were the most recent year of complete data available at the time of our analysis.

Figure 1: National Transportation Safety Board's Obligations on Competitively and Noncompetitively Awarded Contracts and Percent of Total Obligations, Fiscal Years 2020–2024



Source: GAO analysis of Federal Procurement Data System data, as of September 25, 2025. | GAO-26-108506

Note: All obligation amounts were adjusted for inflation to fiscal year 2024 dollars.

What products and services did NTSB contract for from fiscal year 2020 through fiscal year 2024?

According to our analysis of NTSB contract data and discussions with NTSB officials, most of NTSB's contract obligations were on contracts for information technology products and services.[12] Specifically, in the Federal Procurement Data System (FPDS), about 87 percent of the $86 million in obligations on awarded contracts from fiscal year 2020 through fiscal year 2024 were concentrated in three high-level product and service code categories: (1) Professional, Administrative, Management Support Services (about 53 percent); (2) Information Technology Equipment, Software, Supplies, and Support Equipment Products (about 22 percent); and (3) Information Technology and Telecommunications Services (about 12 percent).

According to NTSB officials, the contract awards under all three of these categories were predominantly for significant upgrades to their information technology systems, which were essential to fulfilling NTSB's mission and complying with applicable statutes. NTSB officials emphasized that the total obligations on awarded contracts in the Professional, Administrative, Management Support Services category, like that of the other two top categories, were predominantly comprised of information technology investments. They stated that a significant portion of their information technology contract awards were placed under this category because of how the General Services Administration had categorized the relevant contractors. According to NTSB officials, contract awards under this category included information technology services to develop and maintain systems and applications used to investigate and establish the probable cause of accidents. For example, the Crash Investigation Data Extraction and Readout for flight data recorders and other modal recorders supports NTSB's daily investigative work of discovery, recovery, and analysis.

What categories of products and services had the largest obligations on noncompetitively awarded contracts from fiscal year 2020 through fiscal year 2024?

The top five product and service code categories in FPDS for NTSB's obligations on noncompetitively awarded contracts from fiscal year 2020 through fiscal year 2024 are shown in table 2. According to NTSB officials, as with obligations overall, obligations on noncompetitively awarded contracts in the Professional, Administrative, Management Support category were largely for information technology services, such as the maintenance and enhancement of specialized software.

Table 2: National Transportation Safety Board (NTSB) Top Five Largest Federal Contract Code Categories for Obligations on Noncompetitively Awarded Contracts, Fiscal Years 2020–2024

Category	Examples of spending	Obligations on noncompetitive contracts: Amount ($)	Obligations on noncompetitive contracts: Percent of total
Professional, Administrative, Management Support	Services included the maintenance and enhancement of specialized software that supported crash investigations, recovering and analyzing crash data, and libraries and tools that supported investigative work and managed workflow. For example, NTSB uses the Crash Investigation Data Extraction and Readout software to extract, decode, and analyze raw data from flight data recorders and other transportation recorders.	$4,701,961	34%
Information Technology and Telecommunications	Services include maintenance of a centralized and secure software management system that manages digital documents in a repository, tracks document reviewers and approvers, and publishes documents for public access; and data center hosting services.	$2,926,845	21%
Lease/rent facilities	Services included use of parking spaces at NTSB headquarters, which are assigned in accordance with 41 C.F.R. § 102-74.305 and NTSB policies to enable NTSB personnel within various transportation modes to quickly respond to transportation accidents.	$2,001,556	14%
Information technology equipment, software, supplies, and support equipment	Products included various software tools used to investigate all civil aviation accidents and other modes of transportation—railroad, highway, marine, pipeline, and commercial space.	$1,621,754	12%
Salvage services	Services included (1) the transport and destruction of accident investigation components and wreckage, such as reconstructed airplane fuselage; and (2) facilitating the closure (inventory, removal, disposal, and storage of property) of the NTSB Training Center (closed in January 2023).	$1,177,485	8%
All other products and services[a]	Products included laboratory equipment, navigational instruments, and measuring tools. Services included technical investigation support, utilities, and education and training.	$1,482,413	11%
Total		**$13,912,014**	**100%**

Source: GAO analysis of NTSB information and Federal Procurement Data System data, as of September 25, 2025. | GAO-26-108506

Note: All obligation amounts were adjusted for inflation to fiscal year 2024 dollars. We analyzed the data according to 2-digit product and 1-digit service federal contract data codes. The aggregated 1-digit service and 2-digit product categories show their top five obligations on noncompetitively awarded contracts from fiscal year 2020 through fiscal year 2024.

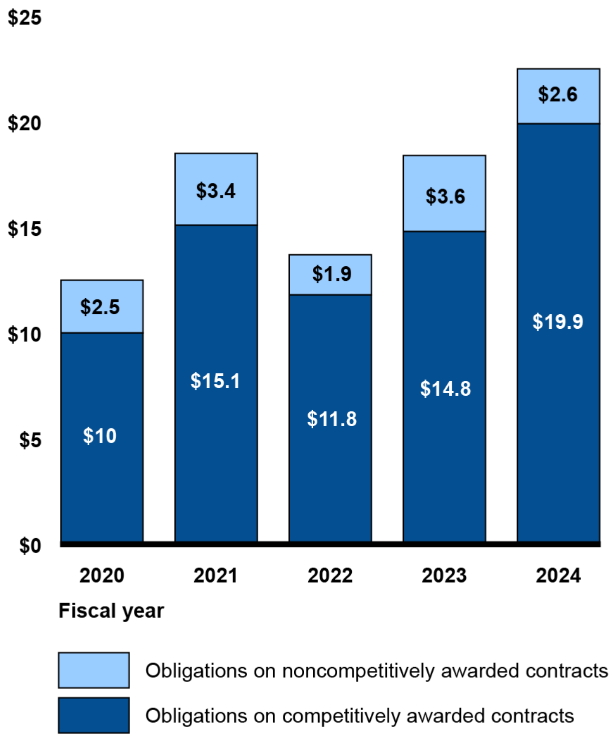
[a]All remaining product and service categories and their obligations on noncompetitive contracts outside of the top five are aggregated.

How did NTSB's obligations on competitively and noncompetitively awarded contracts change from fiscal year 2020 through fiscal year 2024?

Obligations on competitively awarded contracts nearly doubled from fiscal year 2020 to fiscal year 2024, compared with a smaller increase in obligations on noncompetitively awarded contracts. Over the 5-year period, NTSB's total obligations fluctuated by year but increased overall, with the sharpest growth occurring in obligations on competitive awards (see fig. 2). Specifically, obligations on competitively awarded contracts rose from about $10 million in fiscal year 2020 to nearly $20 million in fiscal year 2024. Obligations on noncompetitively awarded contracts also increased, though slightly, rising from about $2.5 million to about $2.6 million over that same time frame.

Figure 2: National Transportation Safety Board's Obligations on Competitively and Noncompetitively Awarded Contracts, Fiscal Years 2020–2024

Dollars in millons



Source: GAO analysis of Federal Procurement Data System data, as of September 25, 2025. | GAO-26-108506

Note: Obligation amounts are adjusted for inflation, in fiscal year 2024 dollars.

According to NTSB officials, the growth in obligations on competitively awarded contracts is largely due to increased investments in information technology products and services. From fiscal year 2020 through fiscal year 2024, NTSB's appropriations increased from about $110 million to $140 million. According to NTSB officials, these funding increases were needed to meet NTSB's hiring and training needs, statutory mandates, and other federal government-wide mandates in a broad number of areas, such as cybersecurity, evidence and data management, information technology systems, facility security, personnel services, and records management. According to NTSB officials, the resulting information technology investments have allowed NTSB to manage improvements in investigation timeliness and to meet congressional expectations for efficient data and knowledge sharing.

In addition, according to NTSB officials, in fiscal year 2023, NTSB was approved for a 3-year investment of $16.2 million from the Technology Modernization Fund to assist in modernizing systems and improving customer experience with digital service delivery.[13] NTSB used the funding for contract awards to build a unified digital experience that enables its public stakeholders to find, understand, and use information it develops as part of its mission mandate. According to NTSB officials, this work is essential to prevent future transportation accidents and loss of life by most effectively informing stakeholders of relevant results of the agency's investigations, findings, and safety recommendations.

Further, NTSB officials said that obligations on noncompetitively awarded contracts from fiscal year 2020 through fiscal year 2024 remained relatively consistent because the particular needs that align with using noncompetitive awards may remain steady across years. For example, NTSB may rely on specialized products and services needed to support investigations. In some cases, NTSB officials said that NTSB maintained contracts with the same supplier of specialized products and services over subsequent years—resulting in obligations that remained relatively consistent over time.

Agency Comments

We provided a draft of this report to NTSB for review and comment. NTSB provided technical comments, which we incorporated as appropriate. In its written comments, which are reproduced in appendix I, NTSB stated that the draft report accurately describes the agency's acquisition framework, procurement policies and procedures, and use of competitive and noncompetitive contract awards.

How GAO Did This Study

To describe the policies and procedures that guide NTSB's procurement of goods and services and determinations to award competitive and noncompetitive contracts, we reviewed statutes, regulations, an executive order, and operations bulletins that NTSB officials stated the agency uses to govern its contracting policies and procedures. We also interviewed NTSB officials about their practices.

To describe how much of NTSB's obligations were on competitively and noncompetitively awarded contracts, changes in obligations, and the categories of products and services that NTSB contracted for from fiscal year 2020 through fiscal year 2024 (the most recent 5-year period with complete data available at the time of our analysis) we did the following: analyzed obligation data provided by NTSB and data downloaded from FPDS, as of September 25, 2025. We used three FPDS fields to determine obligations on competitively and noncompetitively awarded contracts: "solicitation procedures," "extent competed," and "fair opportunity exceptions." Using these data, we identified NTSB's obligations on competitively and noncompetitively awarded contracts, as well as the categories of products and services with the most obligation amounts for both types of contracts. We adjusted all obligation amounts for inflation using fiscal year 2024 dollars. We grouped the product and service codes by using the first digit for services and the first two digits for products. This method enabled us to consolidate the detailed 4-digit codes into broader, comparable categories while maintaining consistency with the classification structure for our analysis.

Competitive contracts included contracts and orders coded in FPDS as "full and open competition," "full and open after exclusion of sources," and "competed under simplified acquisition procedures," as well as orders coded as "subject to fair opportunity" and as "fair opportunity given," and "competitive set aside." Noncompetitive contracts included contracts and orders coded in FPDS as "not competed," "not available for competition," and "not competed under simplified acquisition procedures," as well as orders coded as an exception to "subject to fair opportunity," including "urgency," "only one source," "minimum guarantee," "follow-on action following competitive initial action," "other statutory authority," and "sole source." Even for contracts and orders identified as not competed, agencies may have solicited more than one source.

Also consistent with government-wide category management initiatives and changes in information technology requirements, the General Services Administration realigned product and service codes from legacy information technology codes to newer codes, including both numeric and letter-based codes. To ensure consistency across the 5 fiscal years in our review, we grouped both legacy and newer information technology product-related product and service codes into a single category to cover all information technology product codes. We also interviewed NTSB officials to understand changes in obligation amounts over time, how they defined and used product and service code categories, and the methodology they used to analyze and summarize their data for the same period.

To assess the reliability of these data, we compared data from the two sources for fiscal year 2020 through fiscal year 2024 and found that reported obligation data for competitive, noncompetitive, and total dollars aligned closely between data provided by NTSB and data we downloaded from FPDS. We supplemented this comparison with reviews of recent and similar GAO work on FPDS data reliability. We determined that the FPDS data were sufficiently reliable for our purposes of describing NTSB's obligations on awarded contracts for these years.

We conducted this performance audit from May 2025 to July 2026 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.

List of Addressees

The Honorable Ted Cruz
Chairman
The Honorable Maria Cantwell
Ranking Member
Committee on Commerce, Science, and Transportation
United States Senate

The Honorable Sam Graves
Chairman
The Honorable Rick Larsen
Ranking Member
Committee on Transportation and Infrastructure
House of Representatives

We are sending copies of this report to the appropriate congressional committees, the Chairwoman of the NTSB, and other interested parties. In addition, the report is available at no charge on the GAO website at https://www.gao.gov.

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Appendix I: Comments from the National Transportation Safety Board

National Transportation Safety Board
Office of the Chairwoman
Washington, DC 20594

June 29, 2026

The Honorable Orice W. Brown
Acting Comptroller General of the United States
U.S. Government Accountability Office
Washington, DC 20548

Dear Ms. Brown:

Thank you for the opportunity to review and comment on the Government Accountability Office's (GAO) draft report, *National Transportation Safety Board: Use of Competitive and Noncompetitive Contract Awards to Acquire Products and Services (GAO-26-108506).* The National Transportation Safety Board (NTSB) appreciates GAO's thorough review of the agency's procurement and contracting planning, policies, and practices conducted pursuant to the FAA Reauthorization Act of 2024.

Overall, NTSB believes the draft report accurately describes the agency's acquisition framework, procurement policies and procedures, and use of competitive and noncompetitive contract awards. We appreciate GAO's recognition that NTSB has established multiple levels of review and oversight for contract actions and that the vast majority of the agency's contract obligations during fiscal years 2020 through 2024 were awarded competitively. The report also appropriately acknowledges that NTSB's increased investments in information technology products and services have supported critical mission requirements, strengthened cybersecurity and data management capabilities, improved investigative timeliness, and enhanced the agency's ability to share safety information with stakeholders.

NTSB is particularly pleased that the draft report contains no areas of concern and accurately reflects the agency's longstanding commitment to maintaining effective internal controls, promoting full and open competition to the maximum extent practicable, and ensuring compliance with applicable statutes, regulations, executive orders, and agency policies governing procurement activities.

Before, during, and since the review period covered by GAO's report, NTSB has continued to strengthen acquisition oversight and advance the Administration's goals for efficiency, transparency, and stewardship of taxpayer resources. Among other actions, NTSB:

- Directed the termination of eight contracts, generating annual cost savings of approximately $395,871.

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- Directed the rescoping or renegotiation of six contracts, generating additional annual savings of approximately $593,336.
- Conducted a comprehensive review of contracting policies, procedures, and acquisition personnel responsibilities to ensure compliance with Executive Order 14222, *Implementing the President's "Department of Government Efficiency" Cost Efficiency Initiative*.
- Implemented a Payment Justification System to increase transparency and accountability regarding agency expenditures.
- Reviewed agency purchase card and travel charge card programs and reduced the number of centrally billed travel charge cards, individually billed travel charge card accounts, and purchase card accounts to strengthen oversight and improve program efficiency.

These actions, together with the controls and review processes described in the GAO report, demonstrate NTSB's ongoing commitment to responsible financial management, effective acquisition oversight, prudent stewardship of taxpayer resources, and continuous improvement of agency operations.

NTSB appreciates the professionalism and collaboration demonstrated by the GAO engagement team throughout this review. We look forward to continuing to work with GAO to ensure the final report accurately reflects NTSB's acquisition practices and mission requirements.

Thank you again for the opportunity to comment on this draft report.

Sincerely,

Jennifer L. Homendy

Jennifer L. Homendy
Chairwoman

Endnotes

[1]A responsible source means a prospective contractor that meets certain standards, including having the necessary financial resources, technical skills, and experience to perform the contract, or the ability to obtain them. 41 U.S.C. § 113; FAR 2.101, 9.104-1.

[2]All obligation amounts in this report were adjusted for inflation to fiscal year 2024 dollars. Fiscal year 2024 data were the most recent year of complete data available at the time of our analysis.

[3]The term "procurement" describes the process whereby the government obtains products and services from private parties that it does not produce or provide for itself. See also FAR 2.101. ("acquisition" means the acquiring by contract with appropriated funds of supplies or services, including construction, by and for the use of the federal government through purchase or lease, whether the supplies or services are already in existence or must be created, developed, demonstrated, and evaluated).

[4]Pub L. No. 98-369, §§ 2701-2753, 98 Stat. 1175 (1984); 41 U.S.C. § 3301 (requirement for full and open competition); 41 U.S.C. § 3304 (circumstances allowing use of noncompetitive procedures). Any contract not entered into through the use of procurement procedures expressly authorized by a particular statute is subject to the Competition in Contracting Act. 41 U.S.C. § 3301. Full and open competition can be obtained through the use of sealed bids, competitive proposals, or a combination of competitive procedures under the Competition in Contracting Act. 41 U.S.C. § 3301. The term “executive agency” includes independent establishments in the executive branch. 41 U.S.C. § 133.

[5]41 U.S.C. § 3304.

[6]Pub. L. No. 103-355, 108 Stat. 3243 (1994). The Federal Acquisition Streamlining Act is codified in various sections of Title 41 of the U.S. Code for civilian agencies. The simplified acquisition threshold is generally $350,000, as of July 2026. FAR 2.101.

[7]49 U.S.C. § 1113(b)(1).

[8]Executive Order 14275 directed the Administrator of the Office of Federal Public Procurement Policy, in coordination with the Federal Acquisition Regulatory Council (FAR Council), the heads of agencies, and appropriate senior acquisition and procurement officials from agencies to take appropriate actions to amend the FAR to ensure that it contains only provisions that are required by statute or that are otherwise necessary to support simplicity and usability, strengthen the efficacy of the procurement system, or protect economic or national security interests. See Exec. Order 14275, Restoring Common Sense to Federal Procurement (Apr. 15, 2025). This initiative is called the Revolutionary FAR Overhaul. An Office of Management and Budget memorandum implementing the executive order provides that the deregulation of the FAR will include FAR Council deviation guidance in phase I and a formal rulemaking in phase II. See Office of Management and Budget M-25-26, Overhauling the Federal Acquisition Regulation (May 2, 2025). The model deviation text for the rewritten FAR parts was issued incrementally starting on May 2, 2025, and continued in 2026. NTSB officials stated that the agency has not issued class deviations to adopt model deviation text from the Revolutionary FAR Overhaul and continues to use the legacy version of the FAR. NTSB is currently drafting the class deviations and plans to adopt the model deviation text by August 31, 2026. Accordingly, we reference the legacy version of the FAR, rather than the Revolutionary FAR Overhaul, in this report.

[9]Exec. Order No. 14222, *Implementing the President’s “Department of Government Efficiency” Cost Effciency Initiative*, 90 Fed. Reg. 11095 (Feb. 26, 2025). This executive order directs agency heads to review, modify, or terminate agreements, as appropriate, and establishes additional oversight for expenditures, among other things. The total contract value is the amount of the base and all options, whether they are exercised or not.

[10]National Transportation Safety Board, *Acquisition Policy and Procedures,* Operations Bulletin ACQ-GEN-001 (revised June 2025); *Delegations of Procurement Authority – Acquisition Roles and Responsibilities,* Operations Bulletin ACQ-INT-002 (revised June 2025); *Procurement Request (PR) Procedures,* Operations Bulletin ACQ-GEN-002 (revised June 2025); *Statement of Work (SOW) Guidance,* Operations Bulletin ACQ-GEN-003 (revised June 2025); and *Other Than Full and Open Competition Guidance,* Operations Bulletin ACQ-GEN-003 (revised June 2025).

[11]Federal agencies post contract requirements, and vendors submit quotes on SAM–the System for Award Management–or GSA eBuy–the General Services Administration’s online marketplace. Sole source contracts are among those awarded using noncompetitive procedures. See 41 U.S.C. § 3304.

[12]Beginning in 2020, consistent with government-wide category management initiatives, the General Services Administration changed how product and service codes were applied to information technology requirements. Federal agencies assign product service codes to contract actions, which are then reported in the FPDS.

[13]The Technology Modernization Fund, originally authorized by the National Defense Authorization Act for Fiscal Year 2018, Pub. L. No. 115-91, § 1078, 131 Stat. 1283, 1587 (2017), (codified as amended at 40 U.S.C. 11301 note), makes funds available to agencies to, among other things, modernize information technology systems, strengthen cybersecurity, and improve digital services. The fund is currently authorized through September 30, 2026. Consolidated Appropriations Act, 2026, Pub. L. No. 119-75, § 5010, 140 Stat. 173, 630.