



888 17th St. N.W., Ste. 1100
Washington, D.C. 20006
Ph: 202-775-8400
Fax: 202-857-0200
www.sebac.org

VIA EMAIL

Ms. Christy Strong
Program Analyst
Office of Small Business Programs
Office of the Secretary of the Navy
Washington, DC 20310-0106

5 January 2017

SUBJECT: CPARs System Changes

Dear Ms. Strong:

I am writing to you on behalf of the members of the Small Environmental Business Action Coalition, Inc. (SEBAC) which serves as a voice for the small business community doing environmental work for the Federal Government including all branches of the U.S. Department of Defense (DOD). As a key part of our mission, we continuously work to protect small businesses by upholding the goals, policies, and regulations that foster a fair level of participation by small environmental businesses in the federal government marketplace. The purpose of this letter is to briefly reintroduce SEBAC and request an informational briefing with you to discuss the effects that recent changes to the CPAR scoring system have been having on our membership. We are concerned that the “Excellent” and “Above Average” work being performed by our membership is no longer being captured.

NAVFAC Northwest has informed our membership that interim CPARs are required to be prepared for the first 12 months of each task order. However, the final CPARs are only to reflect quality of performance AFTER the 12 month date and do not reflect the interim ratings. Since a typical Task Order period of performance ranges between 15 and 18 months, the majority of the task order work occurs during the first 12 months of award. Therefore, the final CPARs ratings are reflecting only the work performed during the last 3 to 6 months of the task order which is typically limited to final reporting and project closeout. The membership is frequently seeing final CPAR ratings consist of all “Satisfactory” even when interim CPAR ratings were categorically higher. This is in direct contradiction to statements by USACE at a recent Industry Day where it was clear that a final CPAR should reflect the entire project body of work.

We have also been informed that the USACE and the Navy believes that for fixed-price contracts, a rating higher than “Satisfactory” is generally unachievable. This is based on the belief that for a contractor to achieve a higher rating, the contractor would need to perform beyond the scope of work which is not allowed for fixed-price contracts. For many performance requirements categories specified in recently awarded Task Order scopes of work, the highest achievable rating has been “Satisfactory.” It has been argued that providing higher quality of work, achieving site closure or monitoring program reductions, and successfully performing work at logistically challenging sites should warrant ratings higher than “Satisfactory.” SEBAC members have also requested revision of SOW performance requirements during proposal negotiations to also include “Very Good” and “Exceptional” as an achievable category. These attempts have had limited success.

This change to the CPAR scoring system has serious impacts on the small business community as we seek new work with the federal government. While some within the Navy or USACE may recognize that a ranking of

Page 2

Satisfactory as the highest score achievable on a specific task order, the majority of those federal agencies soliciting proposals expect and anticipate past performance rankings of Very Good and Excellent. Achieving Satisfactory on a very complicated project where client satisfaction can only be discerned through a direct contact with the client, puts the small business at a disadvantage that cannot be mitigated.

These actions have immediate and major impacts on the membership of SEBAC. As the advocacy and voice for this small business community, we are asking for a response to these concerns.

NAVFAC has historically recognized the strength of the small business environmental community by having substantive small business participation at the prime contractor level. We would like the opportunity to meet with you to discuss and see how we can make sure that the procurement process will work more effectively for both NAVFAC and small businesses on future procurements. Our goal is to continue to provide you with the excellent service that you have come to expect from the small business community.

We appreciate your time in reviewing our request and the opportunity to improve the CPARs process. Feel free to forward this to any of the NAVFAC Small Business Deputy Directors or, if you prefer, provide me contacts at the NAVFAC locations and I will forward. Please contact me if you have questions at jdwyer@sebac.org, or 404.229.3807.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. M. Dwyer', written in a cursive style.

John M. Dwyer
President
SEBAC