



Office of Inspector General | United States Postal Service

Audit Report

Noncompetitive Contracts

Report Number 21-019-R21 | September 9, 2021



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Highlights

Objective

Our objective was to determine if the U.S. Postal Service has adequate controls over awarding noncompetitive contracts and whether business scenario justifications were adequately supported.

The goal of the Postal Service's supply chain activities is to obtain the best value, which is generally achieved through competition. Competition brings market forces to bear and helps purchase/supply chain management teams compare the relative value of proposals and prices. Competition also encourages the adoption of innovative ideas and solutions and promotes fairness and openness that leads to public trust. However, there are business situations when the noncompetitive purchase method better suits or is needed to meet the business objectives of the Postal Service.

From fiscal years (FY) 2018 through 2020, about 28 percent of contract dollar commitments were made noncompetitively. Specifically, Supply Management had annual contract commitments of \$5.7 billion in FY 2018, \$8.7 billion in FY 2019, and \$7.3 billion in FY 2020. Of those, the Postal Service had noncompetitive contract commitments of \$1.5 billion, \$2.8 billion, and \$1.7 billion, respectively.

Findings

We found that contracting officers (COs) did not always adhere to policies and procedures to ensure noncompetitive contract awards valued at \$1 million or more were publicized as required.

We selected a statistical sample of 157 noncompetitive contracts, valued at about \$895 million, for adherence with Postal Service policies and procedures. Of these 157 contracts, we identified 16 which were each valued at \$1 million or more. Specifically, we found that 14 of the 16 (88 percent) noncompetitive contract awards valued in total at over \$803 million were not publicized by the COs as required.

Additionally, in our review of all 157 noncompetitive contracts, we found 14 in which the COs did not follow Supply Management policies and procedures for awarding noncompetitive contracts. In these instances, COs did not either

confirm that Noncompetitive Purchase Requests (NPR) were completed and properly supported or perform a CO evaluation that included the supplier's past performance and financial capability along with price reasonableness determination in the award recommendation. We also determined that five of the 157 noncompetitive contracts did not have NPRs with adequate business scenario justifications.

The noncompetitive contract awards valued at \$1 million or more were not publicized as required because COs misinterpreted the publicizing policy, believed that publicizing was not a common practice, or were unaware of the policy itself. COs also stated that recently they did not publicize the contract awards because they lacked time due to the COVID-19 pandemic or did not request a waiver from publicizing.

COs managing noncompetitive contracts did not ensure that NPRs and CO evaluations were complete or consistently uploaded into the Contract Authoring and Management System. Additionally, documents were misplaced or missing. These issues occurred because COs experienced increased workload due to manpower shortages and conflicting responsibilities and priorities due to the COVID-19 pandemic. Contracts sometimes did not have fully supported NPRs because some internal business partners who originated them lacked the knowledge or experience to gather the necessary information to correctly complete the documents.

Publicizing noncompetitive contracts awards as required informs the public of unique Postal Service requirements when competition is not used.

Ensuring evidence of required documents and reviews is maintained is important to support proper awarding of noncompetitive contracts. Vetting for past performance and financial capability as well as price reasonableness reduces supplier fulfillment risk and risk of overpayment for goods and services.

Recommendations

We recommended management:

- Review the policy for publicizing noncompetitive contract awards valued at \$1 million or more and modify to provide clarity for its intent and application.
- Augment the contracting training curriculum to reinforce the requirement to publicize noncompetitive contract awards.
- Update Supply Management's Noncompetitive Contract Award File Review Checklist to include reviewing for publicizing requirement.
- Develop and implement a Noncompetitive Purchase Checklist to ensure required elements and documents are included in noncompetitive contracts and properly and timely uploaded into the contracting system.
- Update Management Instruction, SPS2-2015,1, *Noncompetitive Purchases*, to provide more specific guidance to assist internal business partners in completing and fully supporting documentation submitted to the contracting officer.

Transmittal Letter



OFFICE OF INSPECTOR GENERAL
UNITED STATES POSTAL SERVICE

September 9, 2021

MEMORANDUM FOR: MARK A. GUILFOIL
VICE PRESIDENT, SUPPLY MANAGEMENT

A handwritten signature in black ink, appearing to read "Jason M. Yovich", is positioned below the recipient information.

FROM: Jason Yovich
Deputy Assistant Inspector General
for Supply Management and Human Resources

SUBJECT: Audit Report – Noncompetitive Contracts
(Report Number 21-019-R21)

This report presents the results of our audit of Noncompetitive Contracts.

We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact Shirian Holland, Director, Supply Management and Facilities, or me at 703-248-2100.

Attachment

cc: Postmaster General
Corporate Audit Response Management

Results

Introduction/Objective

This report presents the results of our self-initiated audit of Noncompetitive Contracts (Project Number 21-019). Our objective was to determine if the U.S. Postal Service has adequate controls over awarding noncompetitive contracts and whether business scenario justifications were adequately supported. See [Appendix A](#) for additional information about this audit.

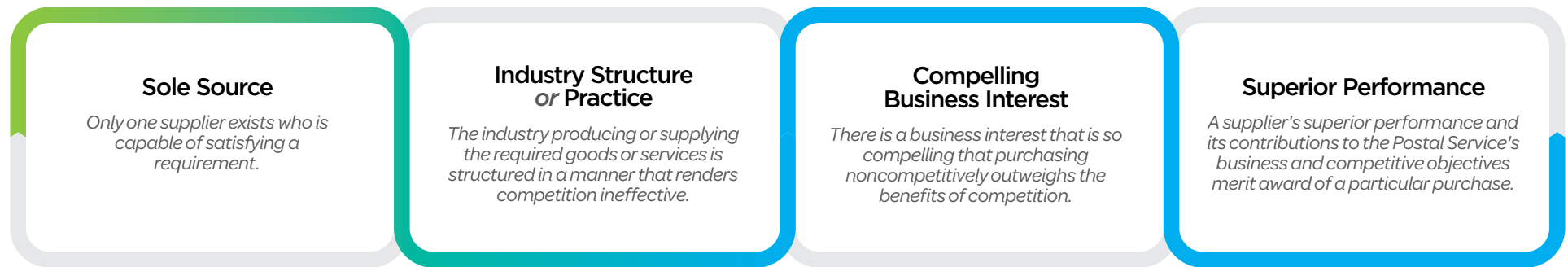
Background

The goal of the Postal Service's supply chain activities is to obtain the best value,¹ which is generally achieved through competition. Competition brings market

forces to bear and helps purchase/supply chain management teams compare the relative value of proposals and prices.² Competition also encourages the adoption of innovative ideas and solutions, and promotes fairness and openness that leads to public trust.³

However, there are business situations in which the noncompetitive purchase method better suits the Postal Service's business objectives. There are four general business scenarios in which the noncompetitive method may best suit or is needed to meet the business objectives of the Postal Service and therefore prove to be the most effective (see Figure 1).

Figure 1. Noncompetitive Purchase Process



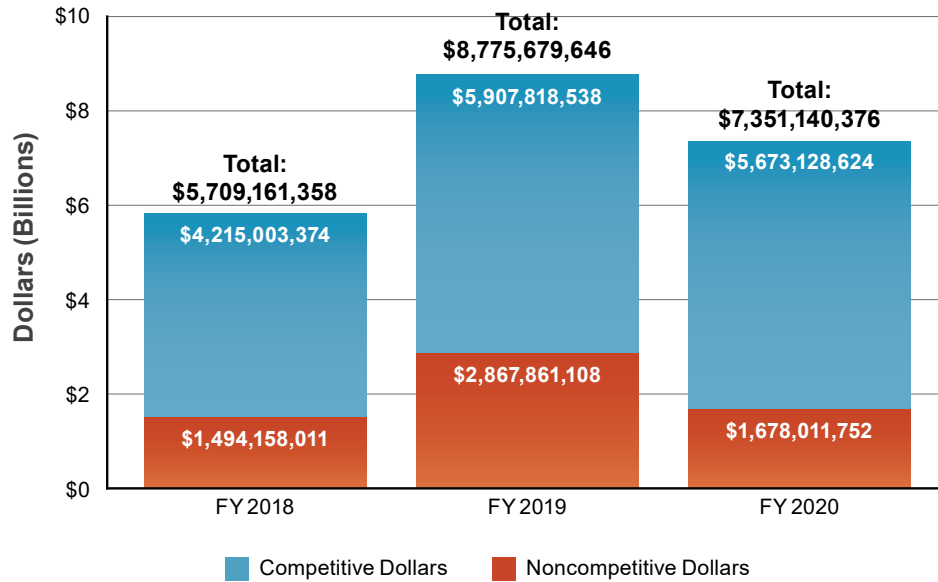
Source: SP&P, 2-10.3.2 Business Scenarios.

Prior to fiscal year (FY) 2021, the Postal Service's Supply Management organization was comprised of five purchasing portfolios: (1) Commercial Products & Services, (2) Facilities, (3) Mail & Operational Equipment, (4) Technology Infrastructure, and (5) Transportation.⁴ From FYs 2018 through 2020, about 28 percent of Supply Management's contract dollar commitments

were made noncompetitively. Specifically, Supply Management had annual contract commitments of \$5.7 billion in FY 2018, \$8.7 billion in FY 2019, and \$7.3 billion in FY 2020. Of those, the Postal Service had noncompetitive contract commitments of \$1.5 billion, \$2.8 billion, and \$1.7 billion, respectively. See [Figure 2](#) for a breakdown of these contract commitments by fiscal year.

¹ Best value is defined as the outcome that provides the optimal combination of elements, such as lowest total cost of ownership, technology, innovation and efficiency, assurance of supply, and quality consistent with the Postal Service's needs and market strategy (*Supplying Principles and Practices* (SP&P), effective October 1, 2018).
² SP&P, 2-10 Determine Extent of Competition (effective October 1, 2018).
³ Postal Service Blue Pages, "Welcome to the Competition Advocate Homepage."
⁴ As part of an FY 2021 Postal Service organizational realignment, the Transportation portfolio was moved from Supply Management to Transportation Strategy.

Figure 2. Noncompetitive vs. Total Committed Dollars⁷



Source: Postal Service Competition Reports FYs 2018, 2019, and 2020.

Finding #1: Noncompetitive Contracts Over \$1 Million Not Publicized

While the Postal Service has established controls in managing noncompetitive contracts, we found that contracting officers (CO) did not always adhere to policies and procedures⁵ to ensure noncompetitive contract awards valued at \$1 million or more were publicized as required.

We selected a statistical sample of 157 noncompetitive contracts, valued at about \$895 million, for adherence with Postal Service policies and procedures. Of these 157 contracts, we identified 16 which were each valued at \$1 million or more. We found 14 of the 16 (88 percent) noncompetitive contracts valued in total at over \$803 million were not publicized after award by the COs as required.

⁵ Consisted of SP&P and Management issued Management Instruction.

⁶ SP&P 2-10.3.8, Publicizing (effective October 1, 2018).

⁷ The practice of a supplier bringing in an outside company or individual to perform specific parts of a contract.

Postal Service policy requires all noncompetitive contract awards valued at \$1 million or more be publicized in the Government Point of Entry and other media, as appropriate.⁶ As a management oversight process, Supply Management conducts periodic compliance reviews of competitive and noncompetitive contracts. For noncompetitive contract reviews, Supply Management uses the Noncompetitive Contract Award File Review Checklist to ensure COs adhered to applicable policies and procedures. Based on our review of the checklist, we found that the publicizing policy was not included as a review item. In addition, we found Supply Management’s SP&P training course did not include the publicizing policy in their training curriculum.

“We found Supply Management’s SP&P training course did not include the publicizing policy in their training curriculum.”

According to the COs interviewed, these noncompetitive contract awards were not publicized because COs misinterpreted the publicizing policy, believed that publicizing was not a common practice, or were unaware of the policy itself.

For example, COs either interpreted the policy to mean publicizing only when subcontracting⁷ opportunities existed or thought it was not applicable when there was a risk of potentially exposing confidential or proprietary information to the public. COs also stated that recently they did not publicize the contracts because they lacked time due to the COVID-19 pandemic or did not request a waiver to publicize. Furthermore, Supply Management’s compliance review process did not ensure that the publicizing policy was followed because the Noncompetitive Contract Award File Review Checklist did not include reviews for this policy.

Publicizing noncompetitive contract awards as required informs the public of unique Postal Service requirements when competition was not used. This information promotes future competition opportunities for suppliers who may have the capabilities to meet the requirements or offer alternative solutions, who would have otherwise not been aware of the requirements in which to offer their goods and services.

Recommendation #1

We recommend the **Vice President, Supply Management**, review the policy for publicizing noncompetitive contract awards valued at \$1 million and modify it to provide clarity for its intent and application.

Recommendation #2

We recommend the **Vice President, Supply Management**, augment the contracting training curriculum to reinforce the requirement to publicize noncompetitive contract awards.

Recommendation #3

We recommend the **Vice President, Supply Management**, update Supply Management’s Noncompetitive Contract Award File Review Checklist to include reviewing for publicizing requirement.

Finding #2: Noncompetitive Contracts Document Issues

COs did not always adhere to Supply Management policies and procedures on awarding noncompetitive contracts. For these instances, COs did not either confirm that Noncompetitive Purchase Requests (NPR)⁸ were completed and properly supported, or perform a CO evaluation,⁹ which includes the supplier’s

past performance¹⁰ and financial capability,¹¹ along with price reasonableness determination in the award recommendation.¹²

In our review of the statistical sample of 157 noncompetitive contracts, we found that 14 (9 percent), valued at over \$104 million, did not have evidence of required supporting documents being completed, had documents missing essential elements, or were missing from the contract file. Of these 14, we did not find evidence of the following (see Table 1).

Table 1. Summary of Missing Documentation

| Description of Missing Documentation | Total Omissions | Total Contract Dollars |
|--------------------------------------|-----------------|------------------------|
| Price Reasonableness | 10 | \$101,222,761 |
| CO Evaluation | 6 | \$1,067,691 |
| Past Performance | 6 | \$1,067,691 |
| Supplier Capability | 6 | \$1,067,691 |
| Adequate Business Scenario | 5 | \$1,200,426 |
| NPR Documents | 2 | \$940,455 |
| Proper NPR Signature | 2 | \$940,455 |

Source: U.S. Postal Service Office of Inspector General analysis.

After the exit conference, management provided price reasonableness support for 4 out of the 10 exceptions and uploaded those documents to the contract file as required.

8 Document created and submitted by the internal business partner, which is the requesting Postal Service organization.

9 The CO’s review of the NPR and written evaluation of the proposed supplier’s past performance, supplier capability, price reasonableness, and any other matter he or she believes will lead to a more informed and effective purchase decision.

10 A supplier that has performed well on previous contracts is likely to do the same on similar contracts in the future.

11 A review of supplier’s financial statements and credit ratings to determine if the supplier will be able to meet the required or proposed delivery schedule.

12 The CO is required to negotiate reasonable pricing and terms and conditions prior to contract award, including review of relevant competitive pricing, when applicable, and a determination that the contract price is fair and reasonable.

Postal Service policy¹³ requires that COs review the NPR and perform a written evaluation of the proposed supplier's past performance and supplier capability and any other matter they believe will lead to a more informed and effective purchase decision. COs are also required to negotiate reasonable pricing and terms and conditions prior to contract award, including review of relevant competitive pricing, when applicable, and determining that the contract price is fair and reasonable. Lastly, COs must ensure that all necessary documentation (e.g., NPR, CO evaluation and recommendation, price determination) is in the contract file.¹⁴

COs managing the contracts did not ensure that NPRs and CO evaluations were complete or consistently uploaded into the Contract Authoring and Management System (CAMS). Additionally, documents were misplaced or missing. These management oversights occurred because COs experienced increased workload due to manpower shortages and conflicting responsibilities and priorities due to the COVID-19 pandemic.

Ensuring evidence of required documents and reviews is maintained is important to support proper awarding of noncompetitive contracts. Vetting for past performance and financial capability as well as price reasonableness reduces supplier fulfillment risk and risk of overpayment for goods and services.

As a Postal Service best practice, we identified a number of COs who used checklists to ensure that their contract files include all pertinent documentation and were properly uploaded into CAMS; however, this practice was not consistent across all portfolios. During the audit, to comply with proper noncompetitive contracts policies and procedures, COs took corrective actions by locating missing and misplaced documents and uploading them into the electronic contract files in CAMS.

“We identified a number of COs who used checklists to ensure that their contract files include all pertinent documentation and were properly uploaded into CAMS; however, this practice was not consistent across all portfolios.”

Recommendation #4

We recommend the **Vice President, Supply Management**, develop and implement a Noncompetitive Purchase Checklist to ensure required elements and documents are included in noncompetitive contracts, and properly and timely uploaded into the contracting system.

Finding #3: Business Scenario Justifications

Noncompetitive Purchase Requests submitted to COs did not always contain fully supported and adequately justified business scenarios. We determined that five of the 157 noncompetitive contracts did not have NPRs with adequate business scenario justifications. While we did not opine on whether the business scenario justifications were the most effective business practice, we assessed whether the NPRs contained sufficient information and documentation to understand the business decisions that led to a noncompetitive purchase method.

According to Postal Service policy,¹⁵ the NPR must include the business scenario and rationale for the noncompetitive purchase. While the extent and detail of the request will depend on the particular purchase and the purchase's complexity and potential dollar value, all elements of the NPR must be addressed fully and completely.

¹³ Management Instruction SP S2-2015-1.

¹⁴ Electronic contract file residing in CAMS.

¹⁵ SP&P 2-10.3.3 Noncompetitive Purchase Request (effective October 1, 2018).

This occurred because some internal business partners¹⁶ who originated the NPRs lacked the knowledge or experience to gather the necessary information to correctly complete the documents. As a result, insufficient or unsupported NPRs from internal business partners can cause increased CO workload and effort to supplement supporting information. For example, of the five contracts we determined not to have adequate business scenarios justification, we observed three instances where the COs performed additional work to obtain more detailed information to fully support the noncompetitive decisions leading to subsequent contract awards.

Recommendation #5

We recommend the **Vice President, Supply Management**, update Management Instruction SPS2-2015,1, *Noncompetitive Purchases*, to provide more specific guidance to assist internal business partners in completing and fully supporting documentation submitted to the contracting officer.

Management's Comments

Management generally agreed with the findings and recommendations in this report.

Regarding finding 1, management stated that based on their review, the OIG overstated the total number of documentation omissions by approximately 70 percent. However, management agreed that not all required file documents were present and contained in the file.

Regarding finding 2, management stated that they disagree with the finding and it is incorrect. Management also stated that the contracting officer did not address the price reasonableness in their evaluations of noncompetitive purchases. Further, as a matter of policy, the CO's evaluation of the noncompetitive purchase request occurs before a requirement is solicited. The price reasonableness determination is made after supplier proposal evaluation and documented in the approved award recommendation for the file. They stated the Management

Instruction on noncompetitive purchases does not require a price reasonableness determination to approve the noncompetitive sourcing approach.

Regarding recommendation 1, management stated they will reiterate the policy for publicizing noncompetitive contract awards valued at \$1 million or more and modify the policy to ensure clarity. The target implementation date is August 31, 2022.

Regarding recommendation 2, management stated their Supplying Principles and Practices training course has been updated and will soon be published to HERO.¹⁷ Due to publication requirements, they cannot make the requested change at this time. However, through formal communication, they will reiterate the requirements to publicize noncompetitive contracts valued at \$1 million or more. The target implementation date is December 31, 2021.

Regarding recommendation 3, management stated they will update their noncompetitive contract award file review checklist to include a checklist element for the publicizing requirement. The target implementation date is December 31, 2021.

Regarding recommendation 4, management stated that there is no need to create a checklist because there is an existing checklist. However, they will review the checklist and issue a formal communication to COs to remind them of its availability to ensure that required elements and documents are included in noncompetitive contracts and files. The target implementation date is December 31, 2021.

Regarding recommendation 5, management stated that they will update Management Instruction SPS2-2015, *Noncompetitive Purchases*, to provide specific guidance to assist internal business partners in completing and fully supporting documentation submitted to COs. The target implementation date is August 31, 2022.

See [Appendix B](#) for management's comments in their entirety.

¹⁶ Internal Postal Service business unit clients.

¹⁷ The Postal Service's Learning Management System.

Evaluation of Management's Comments

The OIG considers management's comments responsive to the recommendations and the corrective actions should resolve the issues identified in the report.

Regarding management's statement, that the OIG overstated the total number of documentation omissions in finding 1; the OIG disagrees with this statement. The OIG noted exceptions of missing documentation not found within the Contract Authoring and Management System during review. Additionally, the OIG contacted each CO responsible for any exceptions found during the review. Based on our meetings with COs, the OIG either verified or corrected any exceptions.

Regarding management's disagreement with finding 2, their focus is on whether or not a price reasonableness determination is needed to approve the noncompetitive sourcing approach. The OIG's focus in this finding pertained to whether or not the price reasonableness existed in the contracting files. According to Postal Service policy, the price reasonableness determination is made after supplier proposal evaluation and documented in the approved award recommendation file. Although management provided four out of 10 missing price reasonableness documents, the remaining six were still missing from the award recommendation file.

All recommendations require OIG concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. The recommendations should not be closed in the Postal Service's follow-up tracking system until the OIG provides written confirmation that the recommendations can be closed.

Appendices

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Appendix A: Additional Information

Scope and Methodology

The team assessed the adequacy of controls over awarding noncompetitive contracts and whether business scenario justifications were adequately supported across all five portfolios from October 2017 through September 2020.

To accomplish the objective, we:

- Used historical data to gain an understanding of the program and performed trend analyses to identify which noncompetitive business justification the Postal Service uses the most and why.
- Selected a statistical sample from CAMS of Postal Service noncompetitive contracts across all five portfolios awarded during FYs 2018, 2019, and 2020.
- Interviewed management to determine their level of oversight and monitoring of noncompetitive contracts policies and its effectiveness.
- Interviewed COs to gain an understanding of Postal Service Supply Management’s controls over noncompetitive contracts.
- Analyzed related computer-generated reports, spreadsheets, and other tools used to manage noncompetitive contracts.

- Performed additional analysis to determine if there were increases in noncompetitive contracts as a result of COVID-19 and the 2020 Presidential election, and whether those purchases were properly supported.

We conducted this performance audit from December 2020 through August 2021 in accordance with generally accepted government auditing standards and included such tests of internal controls as we considered necessary under the circumstances. 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 objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective. We discussed our observations and conclusions with management on August 11, 2021 and included their comments where appropriate.

We assessed the reliability of computer-generated data from CAMS. Although we did not test the validity of controls over these systems, we assessed the accuracy of the data by reviewing existing information, comparing data from other sources, and interviewing Postal Service officials knowledgeable about the data. Therefore, we determined the data were sufficiently reliable for the purposes of this report.

Prior Audit Coverage

| Report Title | Objective | Report Number | Final Report Date | Monetary Impact (in millions) |
|--|---|-------------------|-------------------|-------------------------------|
| <i>Oversight of Contract Extensions</i> | Determine whether Postal Service COs are properly extending contracts. | SM-AR-18-001 | 3/20/2018 | \$4.5 |
| <i>Supply Chain Management Control Environment over Contracting Officers</i> | Assess the effectiveness of Supply Management’s control environment over COs specifically, staff competencies, oversight of contract activities, and workload management. | 18SMG023SM000-R20 | 11/6/2019 | None |
| <i>Contract Closeout Process</i> | Assess the effectiveness of Supply Management’s controls over the contract closeout process. | 19-026-R20 | 4/22/2020 | None |

Appendix B: Management's Comments

MARK A. GUILFOIL
VP, SUPPLY MANAGEMENT



September 2, 2021

JOSEPH WOLSKI
DIRECTOR, AUDIT OPERATIONS

Subject: Management Response to Draft Audit Report Noncompetitive Contracts (Project Number 21-019 DRAFT)

Thank you for the opportunity to provide comments on this draft report. We have reviewed the Office of Inspector General's (OIG) report on Noncompetitive Contracts. Management generally agrees with the findings and recommendations.

Findings

In response to management's request, we appreciate the OIG providing the audit worksheets for the subject audit which lists the individual contracts reviewed and your specific findings. We reviewed these audit worksheets and provided back specific comments for the selected contracts for the OIG's consideration in finalizing the report.

Based on that review, we calculated that Table 1. of the report overstates the total of documentation omissions by approximately 70%, but do agree that not all required file documents were present and contained within the file. SM's Compliance Team will provide feedback to those purchase teams on the data provided.

Concerning Finding #2, the OIG states that contracting officers (COs) did not address price reasonableness in their CO evaluations of submitted noncompetitive purchase requests (NPRs). We view that this finding is incorrect and disagree with that aspect of the finding. As a matter of policy under both Management Instruction (MI) SP-S2-2015-1 and Supplying Principles and Practices (SPs and Ps) Section 2-10.3.5, the CO's evaluation of the NPR occurs *before* a requirement is solicited. As such, there is no submitted pricing to determine "reasonableness" at the time of that evaluation. The price reasonableness determination is made after supplier proposal evaluation and documented in the approved award recommendation (AR) for the file. The MI on noncompetitive purchases does not require a price reasonableness determination to approve the noncompetitive sourcing approach. These points were discussed with the OIG during the report drafting process, but were not corrected or edited within the draft report provided.

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OIG Recommendations

We recommend the Vice President, Supply Management:

Recommendation 1:

Review the policy for publicizing noncompetitive contract awards valued at \$1 million and modify it to provide clarity for its intent and application.

Management Response: Management agrees with this recommendation. We will reiterate policy for publicizing noncompetitive contracts at \$1 million or more through formal communications, and modify the policy to ensure clarity to include text concerning publication requirements, considerations, and their application.

Target Implementation Date: August 2022

Responsible Officials: Director, Supply Management Infrastructure, Supply Management

Recommendation 2:

Augment the contracting training curriculum to reinforce the requirement to publicize noncompetitive contract awards.

Management Response: Management agrees in part with this recommendation. Our SPs and Ps training course has just been updated and will soon be published within HERO. Due to publication requirements, we cannot make the requested change at this time, and would not anticipate another update for a significant period. However, through formal communication, we will reiterate the requirement to publicize noncompetitive contracts at \$1 million or more. Separately from this management response, we will retain this recommendation for future consideration of inclusion within the training curriculum.

Target Implementation Date: December 2021

Responsible Officials: Director, Supply Management Infrastructure, Supply Management

Recommendation 3:

Update Supply Management's Noncompetitive Contract Award File Review Checklist to include reviewing for publicizing requirement.

Management Response: Management agrees with this recommendation. We will update our Noncompetitive Contract Award File Review Checklist to include a checklist element for the publicizing requirement.

Target Implementation Date: December 2021

Responsible Officials: Director, Supply Management Infrastructure, Supply Management

Recommendation 4:

Develop and implement a Noncompetitive Purchase Checklist to ensure required elements and documents are included in noncompetitive contracts, and properly and timely uploaded into the contracting system.

Management Response: Management agrees with this recommendation. We note that there is not a need to develop the subject checklist as we have an existing checklist as noted in Recommendation 3. We will however review the checklist and issue a formal communication to contracting officers to remind them of its availability for their use to ensure that required elements and documents are included in noncompetitive contracts and files.

Target Implementation Date: December 2021

Responsible Officials: Director, Supply Management Infrastructure, Supply Management

Recommendation 5:

Update Management Instruction SPS2-2015, 1, *Noncompetitive Purchases*, to provide more specific guidance to assist internal business partners in completing and fully supporting documentation submitted to the contracting officer.

Management Response: Management agrees with this recommendation. We will update Management Instruction SPS2-2015, 1 for *Noncompetitive Purchases* to provide specific guidance to assist internal business partners in completing and fully supporting documentation submitted to contracting officers.

Target Implementation Date: August 2022

Responsible Officials: Director, Supply Management Infrastructure, Supply Management

E-SIGNED by MARK GUILFOIL
on 2021-09-02 13:42:04 CDT

Mark A. Guilfoil
Vice President, Supply Management

cc: Corporate Audit Response Management

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