

U.S. Environmental Protection Agency FY 2022 Service Contract Inventory Analysis Plan

U. S. Environmental Protection Agency
Office of Acquisition Solutions

February 22, 2023



**U. S. Environmental Protection Agency
FY 2022 Service Contract Inventory
Analysis Plan**

The Environmental Protection Agency (EPA) Fiscal Year 2022 analysis will be performed in accordance with the criteria set out in Consolidated Appropriations Act, 2010, (Pub. L. No. 111-117, § 743 (2009)), Appendix D of the November 5, 2010, OMB Memorandum on Service Contract Inventories, and the December 19, 2011, OMB Memorandum on Service Contract Inventories.

For FY 2022 analysis, EPA will review the 12 special interest Product Service Codes (PSCs) that were designated to have the greatest potential for vulnerability. In addition, EPA will select contracts with the greatest obligated contract dollar and the type of work involved as an initial indicator of risk. The 12 special interest PSCs are outlined in the table below:

PSCs	Description	Total Value 2022
R499	Support-Professional: Other	\$601,555,214.68
F999	Other Environmental Services	\$506,882,295.68
R408	Support-Professional: Program Management/Support	\$299,631,658.64
R425	Support-Professional: Engineering/Technical	\$215,230,333.54
C214	A&E Management Engineering Services	\$213,914,444.65
C211	A/E Services (incl. landscaping interior)	\$54,371,330.35
D399	IT and Telecom-Other IT and Telecommunications	\$85,753,133.66
B510	Study/Environmental Assessments	\$74,645,229.71
D308	IT and Telecom-Programming	\$61,215,242.89
R699	Support – Administrative: Other	\$28,612,719.10
D302	IT and Telecom – Systems Development	\$14,148,627.55
R799	Support-Management: Other	\$4,356,407.65

EPA will approach its analysis using the following method:

- Step 1: Consolidate the data described above.
- Step 2: Crosswalk the data with EPA’s contractor inventory and Federal Procurement Data System (FPDS) data.
- Step 3: Evaluate the data in accordance with Agency and Federal policy and guidance.
- Step 4: Develop criteria to identify individual contracts for in-depth review.

Based on the criteria identified and in accordance with the Consolidated Appropriations Act, EPA will select individual contracts for detailed review in the following order:

- Tier 1: Potential for inherently governmental performance by contractors;
- Tier 2: Contracts providing professional and management services or information technology services;

Tier 3: Contracts that do *not* include professional and management services or information technology services, but were awarded on a non-competitive basis; and

Tier 4: Contracts that do *not* include professional and management services or information technology services, but meet any one of the remaining designated criteria.

To perform its analysis EPA will contact the cognizant contracting officers and contracting officer representatives to gain access to the contracts and related documents as well as to gather information via survey, in-person interviews, and reviews of task orders, invoices, deliverables, and facilities, as appropriate.

The FY 2022 inventory must include a supplement with information collected from contractors on the amounts invoiced and the direct labor hours expended on covered service contracts. The Federal Acquisition Regulation (FAR) Subpart 4.17 addresses the collection of this information.

The Senior Agency Management Official who is accountable for the development of agency policies, procedures, and training associated with OFPP Policy Letter 11-01 addressing the performance of inherently governmental and critical functions (this designation is already required by section 5-4(e) of the Policy Letter) is Raoul D. Scott, Jr. Director of Policy, Training, and Oversight Division.

The Senior Agency Management Official who is responsible for ensuring appropriate internal management attention is given to the development and analysis of service contract inventories is Pamela Legare, Senior Procurement Executive.

The individual who can serve on the work group is Linear C. Cherry, III, Financial Analysis and Oversight Branch, email: cherry.linear@epa.gov; (202) 564-4403.