# CPARS and Writing a Quality Narrative Training

## Session Questions and Responses

1. Question: What systems do design-build projects go into?

Response: Design-Build contracts would be evaluated in CCASS.

1. Question: I run into issues with Contracting Officer Representatives (CORs) who want to rate contractors outstanding. However, when digging for details, the work is out of scope of the task order. Please discuss how this issue should be addressed in the CPARS reporting.

Response: Out of scope work should not be used as a basis for a rating in CPARS. The rating should be based on objective data from the reports/metrics in conjunction with the requirements of the contract.

1. Question: How do you register the contract in CPARS for contracts that are not required to be input into FPDS, i.e. contracts that do not use appropriated funds?

Response: A contract under the threshold, although not required in CPARS, could be manually registered (typically by the Focal Point) in CPARS versus registered through auto-register/FPDS-NG feed. Focal Points will need to register the contract.

1. Question: What are the time limits between ratings on multi-year contracts or when options are exercised?

Response: An assessment is required annually from the award date in CPARS.

1. Question: How do you extend the 30 day comment period in the system so the CPARS will not finalize automatically?

Response: The Assessing Official role has the ability to close the CPAR after the 30 days but does not have to. If they do not close it, then the contractor can comment beyond the 30 days.

1. Question: We are required to review PPIRS when evaluating Past Performance, although it is acknowledged that there is currently no consistency in ratings. Therefore, it is possible for the same level of performance and quality across two contracts; one evaluator may have given the contractor a rating of Satisfactory, while the other gave the contractor a rating of Exceptional. In either case, there may not be a lot of narrative for either rating. How do we properly deal with this during source selection?

Response: If there aren’t facts and documentation to back up either rating, it unfortunately can’t be used for source selection purposes. That is why the narrative is the most important part of the CPAR.

1. Question: Please clarify the difference between "Exceeds specifications" and "Out of Scope.” They can be the same thing!

Response: Within scope would be if it is considered part of the contract work. For example, the contracted Training Specialist develops a new training module that is beneficial to a larger range of users. This would most likely considered exceeding specifications to the benefit of the government. Whereas, if the contracted IT Specialist, scheduled travel for the government employees, that would be out of scope work.

1. Question: Is it true the final CPARS report is intended to only be for the final period assessed and not the entire life of the contract?

Response: Yes, because all evaluations are retained in PPIRS during the life of the contract.

1. Question: Can you discuss a few of the upgrades we're going to see when CPARS is merged?

Response: Most of the changes will be with A&E and Construction contracts as they will be more consistent with the CPARS module. These types of contracts will be required to be reported on in the system annually versus at the end of the contract. All contract types will be using one evaluation form that will be more like the CPAR form now. The CPAR and Contract status reports are merging into one report as well. More information on the Merge can also be found on the CPARS website here: <http://www.cpars.gov/merge-faqs/merge-faqs.htm>

1. Question: Can you further discuss what happens when an "unsatisfactory" rating is given for Utilization of Small Business?

Response: An unsatisfactory rating for Utilization of Small Business per policy means:

“Noncompliant with FAR 52.219-8 and 52.219-9, and any other Small Business participation requirements in the contract/order.” For example:

* Did not submit Individual Subcontract Reports and/or Summary Subcontract Reports in an accurate or timely manner.
* Showed little interest in bringing performance to a satisfactory level or is generally uncooperative.
* Required a corrective action plan.

This would all be seen in PPIRS by Source Selection teams.

1. Question: Will all of the evaluation forms use the same ratings scale?

Response: Yes.

1. Question: Is there a CPARS primer for vendors? Or materials I could use to provide one myself to new vendors?

Response: There really isn’t a set primer but, I would recommend that contractors review the policy guidance and user manuals on the CPARS website found at: <http://www.cpars.gov/main/refmatl.htm>

We also have a free webinar for Contractors. The class schedule can be found on our website at https://ppirs.ppirs.gov/webtrain/app/course\_sched.jsp

1. Question: The CO enters the ratings and if available uses the program team to provide details. Correct?

Response: It depends on how the local agency coordinates the roles in CPARS. For example, the COR could be assigned to enter the ratings as the Assessing Official Rep and submit those to the CO as the Assessing Official. However, the CO could be assigned as the Assessing Official to enter ratings and in this case could gather facts and information offline from the team.

1. Question - Are there sample narratives available to assist in writing CPARS narrative?

Response: We do offer the Quality and Narrative Writing course on a regular basis which goes through examples of narrative. That can be found on the CPARS website at: <https://ppirs.ppirs.gov/webtrain/app/course_sched.jsp>

In addition, there is a Quality Checklist available which also contains examples of narrative. That can be found by going to the CPARS website here: <http://www.cpars.gov/cparsfiles/pdfs/CPARSQualityChecklist.pdf>

1. Question - CPARS is not required at the Delivery Order level of the Multiple Award Schedule (MAS) contracts unless required by the Contracting Officer (CO) is that the Delivery order CO or the MAS CO?

Response: The requirement for MAS Contracts or Federal Supply Schedules is that any order itself over the mandated dollar threshold would be required for CPARS. In this case, the agency placing the order itself would be responsible for entering it into the system.

17) Question:

a) Under a single award IDIQ can an agency report at the either the main contract level or at the task order level or is it mandatory to report at both levels?

b) Is there a way to go in and tie that individual task order CPARS rating to the main contract CPARS?

Response: For single-agency IDIQ contracts, you can report either on the base contract or on each order. You don't have to do both although you can. It is usually done on the base level if the orders are similar in scope and being placed by a single contracting office. It seems that if you have more than one program office, it probably would be better to report on the order level versus trying to consolidate everything. There really isn't a way to tie the base with the ordering Contracting Officer in CPARS.

The registration is typically done by the Focal Point and it is easier entered in at the base level or order level at that time.  If you aren't sure who that Focal Point is but, have a contract number you want to send to me, I should be able to locate that person for you.

1. How often is an amendment written on a contractor evaluation for reason of accuracy and / or quality?

Response: The addendum report is an optional report that is available for the government team to write a follow-up report for example, on warranty performance or contract close-out. It isn’t written as often as the other mandated reports but it is utilized in the system.

1. Is CPARS PBS Guide Rev 2.2, June 27, 2011 the latest version?

Response: I believe that guidance is specific for PBS not FAS. Check with Lydia Domenech on the CPARS PBS Guide Rev 2.2. Ms. Domenech’s POC information is: [lydia.domenech@gsa.gov](mailto:lydia.domenech@gsa.gov), office phone number, (202) 501-0543

1. When does the performance period begin and end?

Response: The performance period is annual beginning from the award date and ending with the contract completion date.

1. Under a multiple award IDIQ contracts - Does CPARS need to be input for each task order issued against the contract - plus a CPARS put in at the main contract level?

Response: For a Multi-agency contract, the requirement is to report on each order over the mandated dollar threshold. It isn’t required to report on the base/main contract level but, is optional should a government agency wish to do so.

1. Who is supposed to initiate the CPARS? The Contracting Officer/Specialist or COR/Project Manager?

Response: This is determined at the local agency level. In a typical situation, the COR inputs the evaluation and sends it to the Contracting Officer for approval.

1. We typically are not responsible for management of sub-contractors; however, we need to rate the project. Any suggestions?

Response: Subcontractors can’t be evaluated in the CPAR form. If a prime contractor has a subcontractor(s), the government team can choose to evaluation how the prime managed the subcontractor(s).

1. However, the CO cannot make any changes to what the COR may have entered. Isn't that correct?

Response: If the CO is assigned as the Assessing Official role in CPARS and the COR the Assessing Official Rep., then yes, the CO can make changes.

1. Can the procurement advocate trump the CO?

Response: The only role that has a final response over the CO or Assessing Official would be the Reviewing Official role. This is typically a division head or chief.

1. If you have multiple Task Orders under a BPA, do you wait until the aggregate value of the Task Orders reaches the threshold to Register the BPA and then provide a rating for the BPA or would you just start rating the BPA on the award date even through the threshold has not been met yet?

Response: The system looks at the base plus all options value so it is really potential spending. If the base plus all options value has the potential to exceed the mandated dollar threshold, then it would be required for CPARS.

1. Task orders are rated; however, what about the cumulative contract?

Response: The main contract may or may not be evaluated if the task orders are in the system. That would be an optional selection by the government team. Therefore, it is not required to report on the base contract level if the task orders are being evaluated separately.