

Appendix B: Standard Inventory Format

PSC	Product or Service Code (PSC)	Product or Service Description	Contracting Agency	Contracting Department	Funding Agency	Place of Performance	City	State	Country	Date Signed	Exempt Category	Fair Opportunity/Limited Sources	Type of Contract	Description of Requirement	Vendor Name	Action Obligation	PLID	Referenced IGW P/ID	DUNS Number
AD26	R&D- DEFENSE OTHER: SERVICES (MANAGEMENT/S	CFTC	CFTC	CFTC	WASHINGTON	DC	US			01/31/2013	NOT AVAILABLE FOR COMPETITION		TIME AND MATERIALS	DOCUMENT MANAGEMENT SUPPORT FOR CFTC'S	IFM TALENT SOURCE LLC	\$25,000.00	CFDD11C000245		169727646
B507	SPECIAL STUDIES/ANALYSIS- ECONOMIC	CFTC	CFTC	CFTC	WASHINGTON	DC	US			06/27/2013	FULL AND OPEN COMPETITION		TIME AND MATERIALS	EXPERT WITNESS SERVICES - IGF-OT-IGF	BATES WHITE, LLC	\$614,350.00	CFENF13C00122		126061725
B599	SPECIAL STUDIES/ANALYSIS- OTHER	CFTC	CFTC	CFTC	WASHINGTON	DC	US			10/17/2012	FULL AND OPEN COMPETITION	FAIR OPPORTUNITY GIVEN	TIME AND MATERIALS	IGF-OT-IGF FAIR LABOR STANDARDS ACT REVIEW	KELLY, ANDERSON & ASSOCIATES, INC	\$87,420.00	CFHRB13D00059	GS02F0057T	161584073
B599	SPECIAL STUDIES/ANALYSIS- OTHER	CFTC	CFTC	CFTC	WATERFORD	VA	US			12/13/2012	NOT COMPETED		TIME AND MATERIALS	ADVISORY AND ASSISTANCE SERVICES FOR CFTC	THEBERGE, HARVEY	\$107,119.20	CFDMO13C00064		809426492
D301	IT AND TELECOM- FACILITY OPERATION AND MAINT	CFTC	CFTC	CFTC	WASHINGTON	DC	US			09/30/2013	FULL AND OPEN COMPETITION	FAIR OPPORTUNITY GIVEN	TIME AND MATERIALS	IGF-OT-IGF LONG TERM ADMINISTRATIVE SUPPORT	ARDELLE ASSOCIATES, INC.	\$40,000.00	CFHRB12D00126	GS07F0005N	181185570
D301	IT AND TELECOM- FACILITY OPERATION AND MAINT	CFTC	CFTC	CFTC	WASHINGTON	DC	US			12/17/2012	FULL AND OPEN COMPETITION	FAIR OPPORTUNITY GIVEN	TIME AND MATERIALS	IGF-OT-IGF LONG TERM ADMINISTRATIVE SUPPORT	AAA TEMPS, INC	\$77,000.00	CFHRB12D00126	GS07F0005N	181185570
D301	IT AND TELECOM- FACILITY OPERATION AND MAINT	CFTC	CFTC	CFTC	WASHINGTON	DC	US			01/24/2013	FULL AND OPEN COMPETITION	FAIR OPPORTUNITY GIVEN	TIME AND MATERIALS	IGF-OT-IGF LONG TERM ADMINISTRATIVE SUPPORT	AAA TEMPS, INC	\$139,000.00	CFHRB12D00126	GS07F0005N	181185570
D301	IT AND TELECOM- FACILITY OPERATION AND MAINT	CFTC	CFTC	CFTC	WASHINGTON	DC	US			07/15/2013	FULL AND OPEN COMPETITION	FAIR OPPORTUNITY GIVEN	TIME AND MATERIALS	IGF-OT-IGF LONG TERM ADMINISTRATIVE SUPPORT	AAA TEMPS, INC	\$177,905.00	CFHRB12D00126	GS07F0005N	181185570
D301	IT AND TELECOM- FACILITY OPERATION AND MAINT	CFTC	CFTC	CFTC	WASHINGTON	DC	US			08/07/2013	FULL AND OPEN COMPETITION	FAIR OPPORTUNITY GIVEN	LABOR HOURS	DATA STORAGE ENGINEER	UNISYS CORPORATION	\$292,992.00	CFODT12D00174	GS35F0343J	150780674
D302	IT AND TELECOM- SYSTEMS DEVELOPMENT	CFTC	CFTC	CFTC	WASHINGTON	DC	US			04/22/2013	COMPETITIVE DELIVERY ORDE		TIME AND MATERIALS	TECHNICAL AND CONTENT MANAGEMENT SUPPOR	AQUILENT INCORPORATED	\$31,000.00	CFIT07D00112	GS35F4729G	103402272
D302	IT AND TELECOM- SYSTEMS DEVELOPMENT	CFTC	CFTC	CFTC	WASHINGTON	DC	US			05/30/2013	COMPETITIVE DELIVERY ORDE		TIME AND MATERIALS	CFTC INTRANET REENGINEERING PROJECT - OTH	AQUILENT INCORPORATED	\$56,315.00	CFIT09D00117	GS35F4729G	103402272
D302	IT AND TELECOM- SYSTEMS DEVELOPMENT	CFTC	CFTC	CFTC	WASHINGTON	DC	US			08/19/2013	FULL AND OPEN COMPETITION	FAIR OPPORTUNITY GIVEN	TIME AND MATERIALS	ELECTRONIC RECORD AND DOCUMENT MANAGEM	CGI FEDERAL INCORPORATED	\$58,708.66	CFIT09B017600	CFIT09B017	145969783
D302	IT AND TELECOM- SYSTEMS DEVELOPMENT	CFTC	CFTC	CFTC	WASHINGTON	DC	US			04/22/2013	COMPETITIVE DELIVERY ORDE		TIME AND MATERIALS	CFTC INTRANET REENGINEERING PROJECT - OTH	AQUILENT INCORPORATED	\$73,000.00	CFIT09D00117	GS35F4729G	103402272
D302	IT AND TELECOM- SYSTEMS DEVELOPMENT	CFTC	CFTC	CFTC	WASHINGTON	DC	US			06/12/2013	FULL AND OPEN COMPETITION	FAIR OPPORTUNITY GIVEN	LABOR HOURS	IGF-OT-IGF	DELOITTE CONSULTING L.P.	\$100,000.00	CFODT12B0116	CFODT12B01	019121586
D302	IT AND TELECOM- SYSTEMS DEVELOPMENT	CFTC	CFTC	CFTC	WASHINGTON	DC	US			06/17/2013	FULL AND OPEN COMPETITION	FAIR OPPORTUNITY GIVEN	FIRM FIXED PRICE	ELECTRONIC RECORD AND DOCUMENT MANAGEM	CGI FEDERAL INCORPORATED	\$106,970.64	CFIT09B017600	CFIT09B017	145969783
D302	IT AND TELECOM- SYSTEMS DEVELOPMENT	CFTC	CFTC	CFTC	WASHINGTON	DC	US			12/26/2012	COMPETITIVE DELIVERY ORDE		TIME AND MATERIALS	TECHNICAL AND CONTENT MANAGEMENT SUPPOR	AQUILENT INCORPORATED	\$118,000.00	CFIT07D00112	GS35F4729G	103402272
D302	IT AND TELECOM- SYSTEMS DEVELOPMENT	CFTC	CFTC	CFTC	WASHINGTON	DC	US			02/15/2013	COMPETITIVE DELIVERY ORDE		TIME AND MATERIALS	TECHNICAL AND CONTENT MANAGEMENT SUPPOR	AQUILENT INCORPORATED	\$122,000.00	CFIT07D00112	GS35F4729G	103402272
D302	IT AND TELECOM- SYSTEMS DEVELOPMENT	CFTC	CFTC	CFTC	WASHINGTON	DC	US			02/07/2013	COMPETITIVE DELIVERY ORDE		TIME AND MATERIALS	CFTC INTRANET REENGINEERING PROJECT - OTH	AQUILENT INCORPORATED	\$140,000.00	CFIT09D00117	GS35F4729G	103402272
D302	IT AND TELECOM- SYSTEMS DEVELOPMENT	CFTC	CFTC	CFTC	WASHINGTON	DC	US			12/26/2012	COMPETITIVE DELIVERY ORDE		TIME AND MATERIALS	CFTC INTRANET REENGINEERING PROJECT - OTH	AQUILENT INCORPORATED	\$145,000.00	CFIT09D00117	GS35F4729G	103402272
D302	IT AND TELECOM- SYSTEMS DEVELOPMENT	CFTC	CFTC	CFTC	WASHINGTON	DC	US			08/20/2013	FULL AND OPEN COMPETITION	FAIR OPPORTUNITY GIVEN	LABOR HOURS	IGF-OT-IGF	NORTHROP GRUMMAN INFORMATION TECHNOLOGY GL	\$160,000.00	CFODT12B0111	CFODT12B01	064680213
D302	IT AND TELECOM- SYSTEMS DEVELOPMENT	CFTC	CFTC	CFTC	WASHINGTON	DC	US			06/28/2013	FULL AND OPEN COMPETITION	FAIR OPPORTUNITY GIVEN	LABOR HOURS	IGF-OT-IGF	DELOITTE CONSULTING L.P.	\$193,760.00	CFODT12B0116	CFODT12B01	019121586
D302	IT AND TELECOM- SYSTEMS DEVELOPMENT	CFTC	CFTC	CFTC	WASHINGTON	DC	US			08/21/2013	FULL AND OPEN COMPETITION	FAIR OPPORTUNITY GIVEN	TIME AND MATERIALS	IGF-OT-IGF	DELOITTE CONSULTING L.P.	\$230,000.00	CFODT12B0116	CFODT12B01	019121586
D302	IT AND TELECOM- SYSTEMS DEVELOPMENT	CFTC	CFTC	CFTC	WASHINGTON	DC	US			05/29/2013	FULL AND OPEN COMPETITION	FAIR OPPORTUNITY GIVEN	TIME AND MATERIALS	RECURRING SUPPORT AND MAINTENANCE OF THE	AQUILENT INCORPORATED	\$278,000.00	CFODT13B0133	CFODT13B01	103402272
D302	IT AND TELECOM- SYSTEMS DEVELOPMENT	CFTC	CFTC	CFTC	WASHINGTON	DC	US			08/08/2013	FULL AND OPEN COMPETITION	FAIR OPPORTUNITY GIVEN	TIME AND MATERIALS	IGF-OT-IGF	DELOITTE CONSULTING L.P.	\$280,000.00	CFODT12B0116	CFODT12B01	019121586
D302	IT AND TELECOM- SYSTEMS DEVELOPMENT	CFTC	CFTC	CFTC	WASHINGTON	DC	US			05/29/2013	FULL AND OPEN COMPETITION	FAIR OPPORTUNITY GIVEN	TIME AND MATERIALS	CFTCNET SUPPORT AND MAINTENANCE. IGF-OT-IG	METROSTAR SYSTEMS INCORPORATED	\$334,002.35	CFODT13B0134	CFODT13B01	125313051
D302	IT AND TELECOM- SYSTEMS DEVELOPMENT	CFTC	CFTC	CFTC	WASHINGTON	DC	US			05/29/2013	FULL AND OPEN COMPETITION	FAIR OPPORTUNITY GIVEN	LABOR HOURS	ELECTRONIC RECORD AND DOCUMENT MANAGEM	CGI FEDERAL INCORPORATED	\$375,000.00	CFIT09B017600	CFIT09B017	145969783
D302	IT AND TELECOM- SYSTEMS DEVELOPMENT	CFTC	CFTC	CFTC	WASHINGTON	DC	US			08/09/2013	FULL AND OPEN COMPETITION	FAIR OPPORTUNITY GIVEN	LABOR HOURS	IGF-OT-IGF	IMAR, INCORPORATED	\$377,059.76	CFODT12B0115	CFODT12B01	062021639
D302	IT AND TELECOM- SYSTEMS DEVELOPMENT	CFTC	CFTC	CFTC	WASHINGTON	DC	US			02/07/2013	FULL AND OPEN COMPETITION	FAIR OPPORTUNITY GIVEN	TIME AND MATERIALS	ELECTRONIC RECORD AND DOCUMENT MANAGEM	CGI FEDERAL INCORPORATED	\$400,421.80	CFIT09B017600	CFIT09B017	145969783
D302	IT AND TELECOM- SYSTEMS DEVELOPMENT	CFTC	CFTC	CFTC	WASHINGTON	DC	US			09/18/2013	FULL AND OPEN COMPETITION	FAIR OPPORTUNITY GIVEN	TIME AND MATERIALS	IT PROFESSIONAL SERVICES - IGF-OT-IGF	DIGICON CORPORATION	\$425,000.00	CFIT08B00800	CFIT08B008	174243907
D302	IT AND TELECOM- SYSTEMS DEVELOPMENT	CFTC	CFTC	CFTC	WASHINGTON	DC	US			08/15/2013	FULL AND OPEN COMPETITION	FAIR OPPORTUNITY GIVEN	TIME AND MATERIALS	IT PROFESSIONAL SERVICES - IGF-OT-IGF	DIGICON CORPORATION	\$750,000.00	CFIT08B00800	CFIT08B008	174243907
D302	IT AND TELECOM- SYSTEMS DEVELOPMENT	CFTC	CFTC	CFTC	WASHINGTON	DC	US			12/20/2012	FULL AND OPEN COMPETITION	FAIR OPPORTUNITY GIVEN	TIME AND MATERIALS	IT PROFESSIONAL SERVICES - OTHER FUNCTIONS	DIGICON CORPORATION	\$1,000,000.00	CFIT08B00800	CFIT08B008	174243907
D302	IT AND TELECOM- SYSTEMS DEVELOPMENT	CFTC	CFTC	CFTC	WASHINGTON	DC	US			05/31/2013	FULL AND OPEN COMPETITION	FAIR OPPORTUNITY GIVEN	TIME AND MATERIALS	IT PROFESSIONAL SERVICES - IGF-OT-IGF	DIGICON CORPORATION	\$1,718,874.00	CFIT08B00800	CFIT08B008	174243907
D302	IT AND TELECOM- SYSTEMS DEVELOPMENT	CFTC	CFTC	CFTC	WASHINGTON	DC	US			04/19/2013	FULL AND OPEN COMPETITION	FAIR OPPORTUNITY GIVEN	TIME AND MATERIALS	IT PROFESSIONAL SERVICES - IGF-OT-IGF	DIGICON CORPORATION	\$2,000,000.00	CFIT08B00800	CFIT08B008	174243907
D302	IT AND TELECOM- SYSTEMS DEVELOPMENT	CFTC	CFTC	CFTC	WASHINGTON	DC	US			02/20/2013	FULL AND OPEN COMPETITION	FAIR OPPORTUNITY GIVEN	TIME AND MATERIALS	IT PROFESSIONAL SERVICES - IGF-OT-IGF	DIGICON CORPORATION	\$4,000,000.00	CFIT08B00800	CFIT08B008	174243907
D304	IT AND TELECOM- TELECOMMUNICATIONS AND TRAI	CFTC	CFTC	CFTC	WASHINGTON	DC	US			07/22/2013	FULL AND OPEN COMPETITION	ONLY ONE SOURCE - OTHER	FIRM FIXED PRICE	WIRELESS AIRCARD SERVICE FOR COMMISSION L	ASPRIGN COMMUNICATIONS COMPANY L.P.	\$26,000.00	CFIT12D00072	GS35F0329L	603493677
D304	IT AND TELECOM- TELECOMMUNICATIONS AND TRAI	CFTC	CFTC	CFTC	WASHINGTON	DC	US			12/20/2012	NOT COMPETED		FIRM FIXED PRICE	MAINTENANCE OF CFTC'S LEGISLATIVE HISTORY	DREED ELSEVIER, INC.	\$34,800.00	CFIL11C00001		877672683
D304	IT AND TELECOM- TELECOMMUNICATIONS AND TRAI	CFTC	CFTC	CFTC	WASHINGTON	DC	US			12/27/2012	FULL AND OPEN COMPETITION	ONLY ONE SOURCE - OTHER	FIRM FIXED PRICE	WIRELESS AIRCARD SERVICE FOR COMMISSION L	ASPRIGN COMMUNICATIONS COMPANY L.P.	\$151,185.85	CFIT12D00072	GS35F0329L	603493677
D304	IT AND TELECOM- TELECOMMUNICATIONS AND TRAI	CFTC	CFTC	CFTC	WASHINGTON	DC	US			01/04/2013	COMPETITIVE DELIVERY ORDE		FIRM FIXED PRICE	BLACKBERRY AND AIRCARD EQUIPMENT / WIREL	MOBILE USA INC.	\$179,960.12	CFIT12D00172	GS35F0303M	60827676
D304	IT AND TELECOM- TELECOMMUNICATIONS AND TRAI	CFTC	CFTC	CFTC	WASHINGTON	DC	US			09/12/2013	FULL AND OPEN COMPETITION	FAIR OPPORTUNITY GIVEN	FIRM FIXED PRICE	IGF-OT-IGF: OPTION FOR CFTC-09-DO-0093	MCI COMMUNICATIONS SERVICES INCORPORATED	\$500,000.00	CFIT09D00935	GS00T07NSJ	020751082
D306	IT AND TELECOM- SYSTEMS ANALYSIS	CFTC	CFTC	CFTC	WASHINGTON	DC	US			07/24/2013	FULL AND OPEN COMPETITION	FAIR OPPORTUNITY GIVEN	FIRM FIXED PRICE	EXPENSE MANAGEMENT SOLUTION IGF-OT-IGF	VERIZON FEDERAL INC.	\$29,300.00	CFODT13D00132	GS11T08BJD	178041406
D306	IT AND TELECOM- SYSTEMS ANALYSIS	CFTC	CFTC	CFTC	WASHINGTON	DC	US			06/06/2013	FULL AND OPEN COMPETITION		TIME AND MATERIALS	TECHNOLOGY SUBJECT MATTER SPECIALIST. IGF	PARKER LITIGATION SERVICES LLC	\$50,000.00	CFIT12C00081		02698280
D306	IT AND TELECOM- SYSTEMS ANALYSIS	CFTC	CFTC	CFTC	WASHINGTON	DC	US			02/20/2013	FULL AND OPEN COMPETITION		TIME AND MATERIALS	TECHNOLOGY SUBJECT MATTER SPECIALIST. IGF	PARKER LITIGATION SERVICES LLC	\$51,200.00	CFIT12C00081		02698280
D306	IT AND TELECOM- SYSTEMS ANALYSIS	CFTC	CFTC	CFTC	WASHINGTON	DC	US			09/18/2013	COMPETED UNDER SAP		FIRM FIXED PRICE	IGF-OT-IGF	MICROSOFT CORPORATION SITZ IN REDMOND CORPORA	\$54,815.00	CFODT13C00181		081466849
D306	IT AND TELECOM- SYSTEMS ANALYSIS	CFTC	CFTC	CFTC	WASHINGTON	DC	US			08/08/2013	FULL AND OPEN COMPETITION		TIME AND MATERIALS	TECHNOLOGY SUBJECT MATTER SPECIALIST. IGF	PARKER LITIGATION SERVICES LLC	\$62,800.00	CFIT12C00081		02698280
D306	IT AND TELECOM- SYSTEMS ANALYSIS	CFTC	CFTC	CFTC	WASHINGTON	DC	US			09/19/2013	FULL AND OPEN COMPETITION	FAIR OPPORTUNITY GIVEN	LABOR HOURS	IGF-OT-IGF	NORTHROP GRUMMAN INFORMATION TECHNOLOGY GL	\$100,000.00	CFODT12B0111	CFODT12B01	064680213
D306	IT AND TELECOM- SYSTEMS ANALYSIS	CFTC	CFTC	CFTC	WASHINGTON	DC	US			08/14/2013	FULL AND OPEN COMPETITION	FAIR OPPORTUNITY GIVEN	LABOR HOURS	IGF-OT-IGF	NORTHROP GRUMMAN INFORMATION TECHNOLOGY GL	\$145,000.00	CFODT12B0111	CFODT12B01	064680213
D306	IT AND TELECOM- SYSTEMS ANALYSIS	CFTC	CFTC	CFTC	WASHINGTON	DC	US			02/25/2013	FULL AND OPEN COMPETITION	FAIR OPPORTUNITY GIVEN	LABOR HOURS	IGF-OT-IGF	NORTHROP GRUMMAN INFORMATION TECHNOLOGY GL	\$291,000.00	CFODT12B0111	CFODT12B01	064680213
D306	IT AND TELECOM- SYSTEMS ANALYSIS	CFTC	CFTC	CFTC	WASHINGTON	DC	US			03/25/2013	FULL AND OPEN COMPETITION	FAIR OPPORTUNITY GIVEN	LABOR HOURS	IGF-OT-IGF	NORTHROP GRUMMAN INFORMATION TECHNOLOGY GL	\$504,000.00	CFODT12B0111	CFODT12B01	064680213
D306	IT AND TELECOM- SYSTEMS ANALYSIS	CFTC	CFTC	CFTC	WASHINGTON	DC	US			06/20/2013	FULL AND OPEN COMPETITION	FAIR OPPORTUNITY GIVEN	LABOR HOURS	IGF-OT-IGF	NORTHROP GRUMMAN INFORMATION TECHNOLOGY GL	\$512,000.00	CFODT12B0111	CFODT12B01	064680213
D307	IT AND TELECOM- IT STRATEGY AND ARCHITECTURE	CFTC	CFTC	CFTC	WASHINGTON	DC	US			05/01/2013	FULL AND OPEN COMPETITION	FAIR OPPORTUNITY GIVEN	LABOR HOURS	IGF-OT-IGF	CHESAPEAKE NETCRAFTSMEN, LLC	\$31,003.00	CFODT13D00113	GS35F0286N	076336457
D307	IT AND TELECOM- IT STRATEGY AND ARCHITECTURE	CFTC	CFTC	CFTC	WASHINGTON	DC	US			03/25/2013	FULL AND OPEN COMPETITION	FAIR OPPORTUNITY GIVEN	TIME AND MATERIALS	IT SUPPORT SERVICES	NORTHROP GRUMMAN SPACE AND MISSION SYSTEMS C	\$40,000.00	CFMM062T033	GS35F4522G	083864038
D307	IT AND TELECOM- IT STRATEGY AND ARCHITECTURE	CFTC	CFTC	CFTC	WASHINGTON	DC	US			08/19/2013	FULL AND OPEN COMPETITION	FAIR OPPORTUNITY GIVEN	TIME AND MATERIALS	IGF-OT-IGF	NORTHROP GRUMMAN INFORMATION TECHNOLOGY GL	\$50,656.89	CFODT12B0111	CFODT12B01	064680213
D307	IT AND TELECOM- IT STRATEGY AND ARCHITECTURE	CFTC	CFTC	CFTC	WASHINGTON	DC	US			07/24/2013	FULL AND OPEN COMPETITION	FAIR OPPORTUNITY GIVEN	FIRM FIXED PRICE	DIGITAL COMMUNICATION SUBSCRIPTION SERVICE	FEDERALS, INC.	\$65,318.40	CFODT13D00138	GS35F0256K	084261082
D307	IT AND TELECOM- IT STRATEGY AND ARCHITECTURE	CFTC	CFTC	CFTC	WASHINGTON	DC	US			09/26/2013	FULL AND OPEN COMPETITION	FAIR OPPORTUNITY GIVEN	LABOR HOURS	IGF-OT-IGF	INTERNATIONAL BUSINESS MACHINE	\$83,014.87	CFODT12B0114	CFODT12B01	835130485
D307	IT AND TELECOM- IT STRATEGY AND ARCHITECTURE	CFTC	CFTC	CFTC	WASHINGTON	DC	US												



US COMMODITY FUTURES TRADING COMMISSION

Three Lafayette Center
1155 21st St. N.W.
Washington, DC 20581

12/19/2013

Mr. Joe Jordan
Administrator
Office of Management and Budget
Office of Federal Procurement Policy
Washington, DC 20503

Subject: Service Contract Inventory

Dear Mr. Jordan:

Pursuant to Section 743 of Division C of the FY 2010 Consolidated Appropriations Act, P.L. 111-117, the Commodity Futures Trading Commission (CFTC) has completed the analysis and review of the agency Fiscal Year 2012 Service Contract Inventory to determine if the mix of Federal employees and contractors is effective or if rebalancing may be required.

As required, the agency focused the analysis on the following two (2) special interest functions that we identified to OMB by Product Service Code (PSC):

<u>PSC</u>	<u>PSC Description</u>
D302	ADP SYSTEMS DEVELOPMENT SERVICES
D307	AUTOMATED INFORMATION SYSTEM SVCS

The analysis, review and the write-up herein were completed and prepared in consultation with the agency's Chief Information Officer and reflect interviews and input from agency Contracting Officers and Contracting Officer Representatives (CORs). In conducting our analysis we carefully reviewed and considered OMB Memorandum M-09-26, dated July 29, 2009, Office of Federal Procurement Policy (OFPP) Letter 11-01, "Performance of Inherently Governmental and Critical Functions", the insourcing guidelines required under section 736 of the Financial Services and General Government Appropriations Act, 2009 (Public Law 111-8, division D) and all applicable internal agency guidance pertaining to this subject matter.

The analysis and review revealed that the support activities provided under the outlined special interest functions are neither inherently Governmental, nor are they personal services contracts as defined in FAR 37.104. Current safeguards in place for monitoring contractor services provide reasonable assurance that work does not become inherently governmental during contract performance.

In addition, the analysis and review revealed that the CFTC is not utilizing contractor services to

perform agency critical functions in such a way that could affect the ability of the agency to maintain control of its mission and operations. Lastly, the analysis revealed that the agency is increasingly relying on contract resources to support its expanded mission as a result of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Pub.L. 111-203, H.R. 4173) which was enacted in July 2010. The agency faces a number of challenges to effectively manage and oversee contract performance to ensure we remain in compliance with all guidelines and laws regarding the subject matter.

Following is a summary of our review by PSC:

For both PSCs D302 and D307, Office of Data Technology (ODT) contractor employees are used to provide Information Technology (IT) systems development and services support based on specialized technical skills that are not performed by ODT staff, but instead, monitored by agency staff project managers. CFTC awarded approximately \$15.9m under PSC D307. CFTC reviewed Task Order MO-062IT033-5 and Blanket Purchase Agreement (BPA) CFODT-12-BP-0111 which account for approximately 77% (\$12.3m) of the obligated dollars under PSC D307. The task order and the BPA are for information technology services required to enhance existing systems and develop new systems to meet required deadlines as a result of Dodd-Frank initiatives.

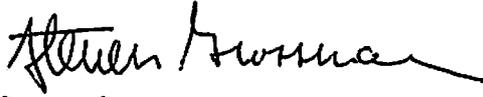
Of the approximately \$10.3m obligated under PSC D302, 72% (\$7.4m) of the dollars were awarded under Blanket Purchase Agreement CFIT-08-BP-0080. The BPA provides CFTC the ability to adjust to surges in workload required to enhance existing infrastructure requirements as it relates to security, telecommunications, and equipment that are needed as a part of the implementation of new initiatives.

For all the awards issued under PSC D302 and D307, ODT project managers track contractor performance via project milestones, project reviews and performance monitoring. All contract support is assigned an ODT IT program manager to manage and oversee various tasks within a contract, which ensures that ODT is maintaining control of missions and operations. ODT was able to hire three (3) IT program managers for systems development projects and one (1) for data standards and analysis projects in FY2012. Furthermore, ODT continues to invest in maturing the Project Management Lifecycle (PMLC), training federal and contractor staff on effectively using the PMLC, continually improving PMLC processes and templates, and improving the integration of the PMLC with IT governance processes such as Capital Planning and Investment Control (CPIC). ODT has integrated the PMLC process and its change management process with an Information Governance working group comprised of privacy and records officers as well as general counsel and data management staff—this reinforces a multi-disciplinary approach to monitoring IT projects and services that benefits contract performance.

In summary, the CFTC expanded its use of contractor resources, in particular services provided under the special interest functions noted in our FY2012 Service Contract Inventory to support agency staff in the Information Technology area. CFTC can provide reasonable assurance that it complies with laws and regulations governing contract resource use and is committed to undertaking the action necessary to reduce risks in delivery of Information Technology contract services.

Please do not hesitate to contact me regarding the agency FY2012 Service Contract Inventory and analysis. I can be reached at (202) 418-5192.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven Grossman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Steven Grossman
Senior Procurement Executive