DEPARTMENT OF COMMERCE

ACQUISITION MANAGEMENT REVIEW PROGRAM

Desk Guide

February 2025

Table of Contents

ACQUISITION MANAGEMENT REVIEW PROGRAM

I. GENERAL INFORMATION

A. What is the purpose of this Desk Guide?

This Desk Guide is designed to supplement Commerce Acquisition Manual 1372, *Acquisition Management Review Program*, to provide Operating Units/Offices with ***practical steps and detailed how-to guidance*** for completing necessary actions for an Acquisition Management Review.

B. Where can I locate the Department of Commerce's policy for conducting Acquisition Management Reviews?

Commerce Acquisition Manual 1372, *Acquisition Management Review Program*, sets forth requirements for the Department's Acquisition Management Review Program and is located at: https://www.commerce.gov/oam/policy/acquisition-policy/commerce-acquisition-manual-cam.

II. ACQUISITION MANAGEMENT REVIEW PROGRAM

A. What types of reviews are conducted under the DOC Acquisition Management Review Program?

The Department's Acquisition Management Review Program includes three types of reviews/assessments that are performed at the Department and Operating Unit/Office levels. These reviews/assessments work together to provide an Assessment Framework that supports a comprehensive, integrated approach that is flexible and scalable and can be tailored to meet the Department's needs. They provide an overall assessment of the health of an acquisition organization, by identifying best practices, opportunities for growth and improvement, and areas of risk. The Assessment Framework includes:

- Organizational Assessments
- Compliance Reviews, and
- Targeted Reviews

B. What is an Organizational Assessment?

Organizational Assessments are conducted to evaluate the four interrelated areas (i.e., cornerstones) that are essential to an efficient, effective, and accountable acquisition process: (1) organizational alignment and leadership; (2) policies and processes; (3) human capital; and (4) information management and stewardship. To provide a comprehensive and structured approach for conducting Organizational Assessments, the Department has adopted a Maturity Assessment Model that encompasses element objectives, critical success factors, and evaluation criteria for each of the four cornerstones.

The Office of Acquisition Management will initiate Organizational Assessments by inviting each Operating Unit and Office with delegated procurement authority to use the Maturity Assessment Model evaluation criteria to conduct a self-assessment.

NOTE: Detailed instructions on using the Maturity Assessment Model are provided in section III.

C. What are Compliance Reviews?

Compliance Reviews examine a representative sample of acquisition actions, contracts, purchase card transactions, policies and internal controls to assess conformance with Federal and Departmental acquisition-related statutes, regulations and policies.

1. **How often are Compliance Reviews conducted?**
   Compliance Reviews are conducted at a minimum of once every 36 months. More frequent reviews may be conducted based on risk.

2. **If an internal compliance review was recently completed, will OAM still conduct a compliance review?**
   In lieu of an independent compliance review, the Office of Acquisition Management may choose to assess an Operating Unit's/Offices internal compliance review conducted within the preceding 24 months to evaluate areas such as: the design and methodology; the scope and comprehensiveness of the review; the effectiveness of corrective actions taken to address findings; and compliance with Departmental standards.

3. **Are standard templates or checklists used for conducting Compliance Reviews?**
   Yes. The Office of Acquisition Management utilizes a web-based survey tool to conduct contract compliance reviews. The templates guide the assessment process and ensure consistency. The templates are reviewed annually and updated as necessary to ensure they remain current.

4. **What are considered "systemic issues"?**
   Systemic issues are identified based on patterns or recurring issues that appear consistently across multiple files, transactions, or processes.

D. What are Targeted Reviews?

Targeted Reviews are conducted to evaluate specific acquisition processes, subject areas, initiatives, or programs to address defined assessment objectives. These reviews are performed as needed, either with a specific acquisition office or across multiple acquisition offices and tailored to meet the specific objectives of the review. Targeted Reviews may include a combination of elements from the Organizational Assessment and Compliance Review processes.

1. **Do Operating Units/Offices have discretion in determining the scope of internal Targeted Reviews?**
   Yes. Targeted Reviews are discretionary. Senior Bureau Procurement Officials have discretion in determining the scope and depth of Targeted Reviews to meet specific objectives and/or address identified risks.

E. Are Operating Units/Offices required to conduct internal Acquisition Management Reviews?

Yes. Commerce Acquisition Manual 1372, *Acquisition Management Review Program*, sets forth requirements for internal Operating Unit/Office reviews. https://www.commerce.gov/oam/policy/acquisition-policy/commerce-acquisition-manual-cam.

III. USING THE MATURITY ASSESSMENT MODEL

A. How do I use the Maturity Assessment Model

The Maturity Assessment Model supports the Organizational Assessment process. The following steps will help to ensure effective use of the model:

- **Step 1: Become Familiar with the Cornerstones and Tabs**
  - The Maturity Assessment Model is organized by nine different tabs, with the first four tabs designated for scoring, and represent each of the four cornerstones.
    - Cornerstone I: Organizational Alignment and Leadership
    - Cornerstone II: Policies and Processes
    - Cornerstone III: Human Capital
    - Cornerstone IV**:** Information Management and Stewardship
  - Each cornerstone tab contains a series of elements, which are dependent upon Critical Success Factors (CSFs) that assess outcomes, program results and accomplishments of specific aspects of the acquisition function. The CSFs are followed by guiding questions and documentation suggestions to demonstrate how the CSF objectives are met, or risks are addressed.
- **Step 2: Collect and Organize Supporting Artifacts**
  - For each CSF, the “Possible Artifacts” column offers examples of relevant documentation that may support the maturity level such as organizational charts, strategic plans, or internal assessment results. This is not an exhaustive list, and other relevant documents may be included if they demonstrate the selected maturity level.
  - Ensure artifacts clearly relate to the criteria for the intended maturity level.
  - If your artifacts differ from the suggested examples, make sure they clearly demonstrate how they meet the criteria for that CSF.
- **Step 3: Score Each CSF Using the Self-Score Dropdown**
  - For each CSF, use the "Self-Score Maturity Level & Criteria" dropdown to select the most appropriate maturity level:
    - Learning: Criteria not met
    - Developing: Initial criteria met (Score: 1)
    - Established: First and second criteria met (Score: 2)
    - Mature: Criteria for prior levels for Learning, Developing, and Established met (Score: 3)
    - Optimized: Criteria for all prior levels (1 through 4) met (Score: 4)
  - Each level builds on the preceding level, so ensure that all criteria and supporting documentation for previous levels are satisfied before selecting a higher level.
- **Step 4: Review and Interpret Scores in the Scoring Tab**
  - The fifth tab labeled “Scoring”, calculates results based on the selected maturity levels, providing a cumulative score and summarized view of acquisition maturity across cornerstones.
  - The Scoring tab also includes embedded formulas for calculating the scores—<u>do not alter these</u>, as doing so may impact the accuracy of the final score. Refer to this tab only to review and interpret cumulative results.
- **Additional Tabs for OAM’s Evaluation**
  - The remaining four tabs labeled **C1_Legend** through **C4_Legend** are intended for use by OAM during its evaluation process.

- These tabs should remain unchanged by Bureaus, as they contain specific formulas and guidelines critical to the scoring process.

B. What information do I need to provide to support the self-assessment?

To support the self-assessment rating, the Operating Unit/Office must submit artifacts i.e., documents that demonstrate evidence of maturity for each critical success factor as outlined in the Maturity Assessment Model. Each artifact must be clearly linked to a specific critical success factor(s).

C. Will the Maturity Assessment Model template change?

Yes. No later than ***August 31st*** of each year, the Office of Acquisition Management will release an updated Maturity Assessment Model template for the next fiscal year, documenting changes. The Office of Acquisition Management will request that each Operating Unit and Office use the updated Maturity Assessment Model template to conduct an annual self-assessment. The current template is located at: https://www.commerce.gov/oam/policy/acquisition-policy/commerce-acquisition-manual-cam.

1. **What happens to the rating from the previous fiscal year?**
   Previous year's ratings will be ***pre-populated*** in the annual template, with the exception of those rating levels that are new or have changed.

2. **Will I need to resubmit artifacts that were previously submitted and accepted for my prior rating?**
   To support the annual self-assessment rating, the Operating Unit/Office must submit artifacts to support any proposed changes to the previous year's final ratings, changes to critical success factors and/or evaluation criteria that resulted from updates to the template, and any new elements, critical success factors, and/or evaluation criteria that were added to the updated template. ***Only new artifacts need to be submitted; previous documents will be used, if applicable***.

3. **If I am satisfied with a final maturity level rating from the previous year, am I required to demonstrate an increase in the maturity level for that specific critical success factor?**
   No. Although you are encouraged to strive for continuous improvement and progression to a higher maturity level, you are not required to demonstrate progress each year.

D. When are annual self-assessments due?

The annual self-assessments, and supporting documentation (artifacts), must be submitted to the Office of Acquisition Management for independent assessment and rating no later than ***January 15th*** of each year via the OAM mailbox at: oam_mailbox@doc.gov.

1. **Is an annual self-assessment required if a Baseline assessment has not been conducted?**
   No. The requirement for annual self-assessments begins after the initial baseline assessment is conducted.

2. **What resources are available to me to assist with completing the self-assessment?**
   The Office of Acquisition Management will host office hour sessions to answer questions and clarify aspects of the self-assessment process. In addition, the Office of Acquisition Management can provide examples or additional guidance to help with the self-assessment process.

E. Will final Organizational Assessment maturity level ratings influence the frequency and depth of Compliance Reviews?

No. An Organizational Assessment is not a compliance review; it demonstrates progression from one level of maturity to the next and is designed to foster continuous improvement and development. Therefore, final maturity levels ratings of the Organizational Assessment will not influence the frequency and depth of Compliance Reviews.

IV. PROCEDURAL MATTERS

A. Who is on the Acquisition Management Review Team?

For Department-level assessments and reviews, the Acquisition Management Review Team Lead will determine the composition and size of the team. The team may include a representative from the Office of General Counsel, a Small Business Specialist, Cost/Price Analyst, and/or other individuals with specialized expertise to examine a specific focus area.

1. **Can I volunteer to participate on the Acquisition Management Review Team?**
   Yes, Senior Bureau Procurement Officials may be requested to nominate volunteers to participate on the team for assessments and reviews of their peer organizations. Nominees must be senior-level 1102 professionals possessing a minimum of five-years of operational contracting experience with sufficient depth and breadth of acquisition proficiency.

2. **How will OAM prepare volunteers for their participation on the Acquisition Management Review Team?**
   The Acquisition Management Review Team Lead will brief team members on the tools (e.g. AMR Maturity Assessment Model, web-based contract file review checklists, reference materials, etc.) and establish work processes and standards for conducting the assessment/review prior to commencement of the assessment/review.

3. **How does the Acquisition Management Review Team Communicate during the process?**
   During the assessment/review, the Acquisition Management Review Team Lead will be the primary point of contact for questions, from team members and the contracting office. The team will meet regularly during the assessment/review process to discuss identified findings, areas of concern and interpret artifact submissions.

B. Are Operating Units/Offices notified in advance of upcoming Acquisition Management Reviews?

Yes, the Office of Acquisition Management will issue advance notifications to Senior Bureau Procurement Officials for all Acquisition Management Review assessments and reviews. The notification will address:

- Focus areas, scope and other requirements of the assessment or review;
- List of documents that must be submitted for analysis prior to commencement of the assessment or review (e.g., previous audit findings and associated corrective actions); and
- List of contract files to be reviewed, if applicable.

1. **After receiving a notification, what action(s) should I take?**
   Upon receiving a notification of an upcoming Acquisition Management Review, begin preparing by:
   - **Designating a Point of Contact** to coordinate AMR-related activities with OAM and facilitate the review process.
   - **Coordinating with Other Functional Areas** to proactively establish clear lines of communication between the procurement office and these offices to streamline the submission of required documents and ensure alignment on key processes.
   - **Gathering Documentation** ensuring that all relevant files are available.

Use this notification period to set internal deadlines that allow your team ample time to compile documents, cross-check contract files, and engage with other offices (such as Human Resources and Finance).

C. What is the purpose of an Entrance Briefing?

During the entrance briefing, the objectives and general scope of the assessment or review, notional timeline, and other relevant matters will be discussed. Senior Bureau Procurement Officials will have the opportunity to provide information pertinent to their organization that may assist in conducting the assessment or review.

1. **How should I prepare for an Entrance Briefing?**
   Use the entrance briefing to clarify document submission expectations, timelines, and any specific areas of focus for the review. Be prepared with a list of questions.

D. How long does it take to complete an Acquisition Management Review?

The length of time required to perform an assessment or review will depend upon various factors including the size of the organization, sample population, volume of documentation, number of members on the review team, and the scope and depth of the review. Therefore, a notional timeline will be developed that considers the various factors.

E. What should I do to prepare for an Acquisition Management Review?

The Acquisition Management Review process involves an evaluation of contract files, processes, and internal controls. The following procedural guidelines will help prepare you for the review:

- Contract File Preparation: Ensure all contract files to be reviewed are available, well-organized, and all required documents are uploaded to the designated repository.
- Surveys and/or Interviews: Notify staff and customers that they may be requested to participate in a survey or interview.

F. What are ‘artifacts’ for the Organizational Assessment?

Artifacts play a critical role in demonstrating the maturity levels of the Bureau's acquisition function assessed through the AMR Maturity Assessment Model. While examples of possible artifacts are provided within the AMR Maturity Assessment Model, it is important to recognize that the examples are intended only as a guide, and do not constitute an exhaustive list of documentation that may be submitted. You are strongly encouraged to submit any relevant documentation that effectively illustrates progress and compliance with the critical success factors.

1. **How do I submit artifacts to the Acquisition Management Review Team?**
   Artifacts should be documented systematically and clearly to ensure they effectively support the maturity levels assessed in the AMR Maturity Assessment Model. The following guidelines will help ensure that artifacts are properly submitted and documented:
   - **Categorize Artifacts**: Organize artifacts to directly link to the specific critical success factor it supports.
   - **Use Naming Conventions**: Label each artifact clearly with a consistent naming convention that includes the critical success factor it supports and the type of document. For example, an artifact supporting the critical success factors for "Assuring Appropriate Placement of the Acquisition Function" under Cornerstone **I**, Element **A**, Critical Success Factor **1**, may be labeled as "I.A.1_OrgChart."
   - **Maintain Version Control**: If multiple versions of a document exist, ensure each version is clearly labeled, and any previous versions are archived or referenced as necessary.
   - **Documentation Index**: Create an index of all submitted artifacts, detailing the artifact name, critical success factor it supports, and a brief description.
   - **Include Context for Each Artifact**: If it is not clearly obvious how an artifact aligns with the critical success factor, provide an explanation, showing how it supports the assessed maturity level that clearly demonstrates compliance with the relevant critical success factor.
   - **Security and Confidentiality**: Store artifacts in a secure, central location (e.g., SharePoint, TEAMS, Google Docs or a secure document management system such as Kiteworks), agreed upon by OAM, where they can be accessed by the AMR team and any other authorized personnel.
   - **Submission to OAM**: Follow any specific submission instructions provided by OAM, including deadlines and required formats.
   - **Quality Assurance**: Before submission, verify that all artifacts are complete, properly labeled, organized to correspond to applicable critical success factor, and included in the index.
2. **<u>What types of documents are considered “readily available documentation”?</u>**
   The term “readily available documentation” refers to documents that the Office of Acquisition Management has on file (e.g., human capital plan, procurement forecasts, etc.). The Office of Acquisition Management will provide a list of readily available documents.

G. <u>How should we engage the Acquisition Management Review Team?</u>

Maintaining open communication with the Acquisition Management Review Team throughout the process is essential to ensuring smooth progress and avoiding misinterpretations. Communication begins with the entrance briefing and continues throughout the review process, with periodic updates and regular check-ins, to address emerging issues, provide clarification, submit additional documentation, as requested, and receive feedback on progress.

Pro Tips:

- *Office Hours:* Participate in OAM sponsored Office Hours to ask questions, etc.
- *Regular Check-Ins:* Establish and maintain regular touchpoints to discuss initial findings and provide clarification on specific issues, where needed.
- *Raise Concerns:* Proactively identify and raise emerging concerns related to documentation, preliminary findings, or procedural aspects of the review.
- *Key Staff:* Ensure that key staff who are familiar with the documents are ready to clarify details and provide additional context, as needed.

H. Will I receive periodic updates throughout the AMR?

During an assessment or review, the Office of Acquisition Management may hold progress meetings with officials of the organization being assessed to discuss progress and identify issues being developed. During these meetings, officials are encouraged to express their views on the preliminary findings and to provide any information that may have been overlooked by the review team that could alter or impact final results.

I. Will the Acquisition Management Review cause disruptions to my operations?

The Acquisition Management Review Team will strive to conduct the review with minimal disruption to daily operations of the contracting office. However, it may be necessary to engage with contracting personnel and other relevant staff to:

- Gain clarification on submitted documentation
- Expand on identified weaknesses
- Understand rationale behind certain actions
- Further explore issues noted during the review of selected documents.

These engagements are intended to gather additional context to better understand the facts and rationale behind certain actions to ensure that any areas or concern are accurately reported. The goal is to fully understand the actions taken and ensure a fair and accurate assessment.

J. What is the purpose of an Exit Briefing?

The Office of Acquisition Management will conduct an exit briefing with the organization being reviewed to provide a high-level summary of preliminary results, including any findings and discrepancies in ratings, rationale for final ratings, and a summary of key points. The exit briefing serves as an opportunity to address any remaining questions or concerns and to discuss the next steps in the process.

1. Will I have an opportunity to provide clarifications and feedback during the Exit Briefing?

Yes. During the Exit Briefing, you will have the opportunity to ask questions, clarify specific findings, and provide additional context.

2. How should I prepare for the Exit Briefing?

Prior to the Exit Briefing, review preliminary findings and be prepared to clarify and/or provide additional context that may explain aspects of the results. Involve key stakeholders, such as subject matter experts, to provide their insights.

V. REPORTS

A. Will I have an opportunity to review the Acquisition Management Review Report before it's finalized?

Yes. After the Exit Briefing, the Office of Acquisition Management will issue a draft report for review and comment. The Senior Bureau Procurement Official must respond to the draft report within ***30 calendar days*** of its issuance, providing comments and any additional information that may clarify or challenge the results.

1. Who makes the final decision when there is a disagreement between the Acquisition Management Review Team and the Operating Unit/Office about an observation or finding?

Acquisition Management Review reports are issued by the Senior Procurement Executive who has the authority to make final decisions on disputed issues. The Senior Procurement Executive will consider all comments and additional information provided in response to the draft report and make final decisions on any disputed issues and/or changes before finalizing the report.

B. What is the purpose of the Final Acquisition Management Review Report?

The final report communicates the results of the assessment or review and serves as a comprehensive record of the analysis, findings, and recommendations for enhancing the acquisition organization. The final report is an internal document, not for official publication.

1. Who receives a copy of the final report?

The Senior Procurement Executive will issue the final report to the Senior Bureau Procurement Official and provide a copy to the individual's supervisor.

C. What happens after the final Acquisition Management Review Report is issued?

Senior Bureau Procurement Officials shall review final reports and prepare a Corrective Action Plan to specifically address any findings and recommendations identified in the report.

VI. CORRECTIVE ACTION PLANS

A. When are Corrective Action Plans due?

The Corrective Action Plan shall be submitted to the Office of Acquisition Management within **60 calendar** days after issuance of the final report.

B. What should be included in the Corrective Action Plan?

Corrective Action Plans must include specific actions that are realistic, actionable, and clearly address the identified issues with target completion dates. They must address the causes of deficiencies and outline the steps necessary to prevent its recurrence. It should also include strategies for improving any weaknesses identified in the Acquisition Management Review. It must be detailed enough to provide a clear path for addressing the deficiencies and improving the acquisition processes. At a minimum, the Corrective Action Plan must include:

- **Analysis of Identified Weaknesses**: A thorough explanation of each weakness identified in the Acquisition Management Review, including the underlying causes.
- **Corrective Actions**: Specific actions taken or planned to correct identified weaknesses, with clear description of the steps to address each finding.
- **Preventative Measures**: Actions to prevent recurrence of identified weaknesses. This may include changes to policies, procedures, training, or practices that mitigate the risk of future deficiencies.
- **Milestone Schedule**: A timeline with targeted implementation dates for each corrective action.

Pro Tip: Use the Corrective Action Plan template provided as Appendix A (or a similar structure) to ensure that corrective actions are organized, actionable, and include clear timelines and responsibilities.

C. How will I know if the Corrective Action Plan is accepted?

The Office of Acquisition Management will review the proposed Corrective Action Plan to verify that it adequately addresses the findings and recommendations identified in the final report. The Senior Bureau Procurement Official will be notified of the decision to either accept the action plan or request revision.

D. What happens after the Corrective Action Plan is accepted?

Once the plan is accepted, the Senior Bureau Procurement Official shall:

- Monitor progress to ensure actions are completed as required.
- Provide quarterly updates to the Office of Acquisition Management at: OAM_Mailbox@doc.gov.
- Assess corrective actions taken in response to assessments and reviews in subsequent Organizational Assessments, Compliance Reviews, and/or Targeted Reviews.

Corrective actions taken in response to findings from an Acquisition Management Review will be evaluated during subsequent Organizational Assessments, Compliance Reviews, and/or Targeted Reviews.

Pro Tip:

- **Corrective Action Tracker***:* Use a tracking document to log all identified issues, deadlines, responsible staff, progress, and outcomes. Regularly share the document with leadership to ensure accountability.
- **Dedicated Oversight**: Assign dedicated staff to oversee and track corrective actions and ensure the status is updated regularly.

VII. CLOSING OUT AN ACQUISITION MANAGEMENT REVIEW

A. <u>How is an Acquisition Management Review closed out?</u>

After the Office of Acquisition Management receives all supporting documentation and determines that all corrective actions have been adequately addressed and completed, the Senior Procurement Executive will issue a formal notification to the Senior Bureau Procurement Official to close out the assessment or review.

VIII. CONTINUOUS IMPROVEMENT

A. <u>How can I use the Acquisition Management Review process to promote continuous improvement?</u>

Continuous improvement is essential to maintaining a high-performing acquisition function. The Acquisition Management Review process provides an opportunity to identify areas for growth, implement corrective actions, and engage in continuous self-assessment and communication to drive long-term success. Acquisition Management Reviews should be part of ongoing efforts to monitor and improve acquisition processes.

Pro Tip:

- ✓ *<u>Post-AMR Debrief:</u>* Conduct an internal team debrief after an Acquisition Management Review to discuss both positive feedback and critical findings. Use this opportunity to discuss how to implement changes and improve in the next assessment/review cycle.
- ✓ *<u>Maturity Model:</u>* Use the Maturity Assessment Model to identify growth areas and set goals for continuous improvement.
- ✓ *<u>Year-Round Tracking:</u>* Track improvements year-round. This ensures that any gaps identified in assessments/reviews are monitored and updated.

APPENDIX A: CORRECTIVE ACTION PLAN TEMPLATE

Acquisition Management Review Corrective Action Plan							
ID	**Finding**	**Recommendation**	**Bureau Response**	**Proposed Corrective Action**	**Target Completion Date**	**Document of Resolution**	**Status**