



Report to the Republican Leader,  
Subcommittee on Social Security,  
Committee on Ways and Means, House  
of Representatives

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July 2020

# SOCIAL SECURITY CONTRACTING

## Relevant Guidance Should be Revised to Reflect the Role of Contracting Personnel in Software Development

Accessible Version

# GAO Highlights

Highlights of [GAO-20-627](#), a report to the Republican Leader, Subcommittee on Social Security, Committee on Ways and Means, House of Representatives

## Why GAO Did This Study

SSA is responsible for delivering services that touch the lives of virtually every American. To do so, SSA relies on a variety of products and services, including information technology (IT) systems. SSA obligates approximately \$1.5 billion annually to procure goods and services, 65 percent of which are IT-related.

GAO was asked to assess how SSA implements its contracting and acquisition processes. This report examines: (1) how SSA awards and oversees contracts for products and services, and (2) the extent to which SSA has updated its guidance regarding the role of contracting personnel in software development efforts.

GAO reviewed SSA's acquisition policies, interviewed contracting officials, and reviewed a non-generalizable sample of 27 high- and lower value contracts and orders with dollars obligated in fiscal years 2014 through 2018. GAO also examined data from fiscal years 2015-2019 to determine what SSA contracted for and reviewed IT guidance. GAO compared SSA's practices to leading practices for Agile software development with respect to the roles of contracting personnel.

## What GAO Recommends

GAO recommends that SSA revise relevant guidance to identify the roles of contracting personnel in Agile software development. SSA agreed with this recommendation.

View [GAO-20-627](#). For more information, contact William Woods at (202) 512-4841 or [woodsw@gao.gov](mailto:woodsw@gao.gov).

July 2020

# SOCIAL SECURITY CONTRACTING

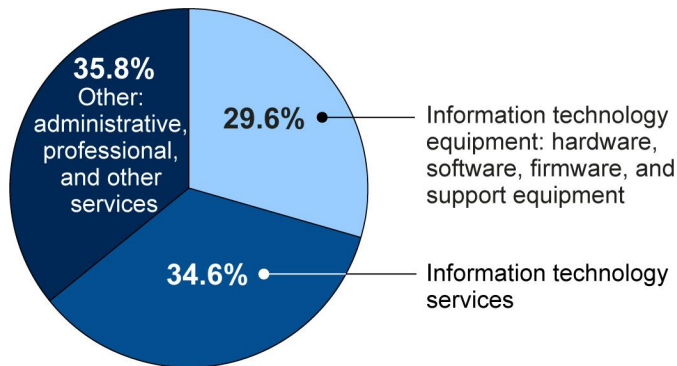
## Relevant Guidance Should Be Revised to Reflect the Role of Contracting Personnel in Software Development

## What GAO Found

The approach followed by the Social Security Administration (SSA) in awarding and overseeing contracts generally aligns with the requirements GAO reviewed. For the 27 contracts and orders GAO reviewed, SSA varied its approach depending on the contract type used and the dollar value. For example, one of SSA's written acquisition plans acknowledged the risks to the government associated with time-and-materials contracts. From fiscal year 2015 through 2019, SSA obligated 22.7 percent of its contract dollars on time-and-material contracts compared with 10.5 percent at other civilian agencies. In addition, from fiscal year 2015 through 2019, the rate at which SSA used competitive award procedures to achieve the best value for the agency increased by nearly 20 percentage points. This increase was the result of the agency's increased use of competition in its contracting for information technology (IT).

SSA relies heavily on IT resources to support the administration of its programs and related activities. During fiscal years 2015 through 2019, about 65 percent of the \$8.3 billion in contract obligations were for IT goods and services compared with about 16 percent at other civilian agencies. The figure shows the percentage of obligations for IT goods and services at SSA.

Percentage of Social Security Administration's Contract Obligations for Goods and Services during Fiscal Years 2015 through 2019



Source: GAO analysis of Federal Procurement Data System-Next Generation data. | GAO-20-627

Data Table for Percentage of Social Security Administration's Contract Obligations for Goods and Services during Fiscal Years 2015 through 2019

Other: administrative, professional, and other services	Information technology services	Information technology equipment: hardware, software, firmware, and support equipment
35.8	34.6	29.6

SSA adopted an Agile approach to software development for some of its critical IT programs in 2015. An Agile approach to software development involves incremental improvements to software rather than the more traditional single-track approach. Subsequently, SSA developed an IT modernization plan in 2017 that states SSA will use an Agile methodology. GAO's draft Agile Assessment

Guide states that an organization's acquisition policies and guidance should support an Agile development approach and identify clear roles for contracting personnel, since this is a different approach than federal agencies previously used. However, GAO found SSA's acquisition handbook does not specifically identify a role for contracting personnel with respect to contracts and task orders involving Agile, which GAO has identified as a leading practice. Identifying a role for contracting personnel in the Agile process should better position SSA to achieve its IT modernization goals and provide appropriate levels of oversight.

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### Abbreviations

COR	contracting officer's representatives
CPARS	Contractor Performance Assessment Reporting System
DCPS	Disability Case Processing System
DCPS2	Disability Case Processing System, version 2
FAR	Federal Acquisition Regulation
FPDS-NG	Federal Procurement Data System-Next Generation
HubZone	Historically Underutilized Business Zones
IG	Inspector General
IT	information technology
OAG	Office of Acquisition and Grants
SBA	Small Business Administration
SSA	Social Security Administration

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July 31, 2020

The Honorable Tom Reed  
Republican Leader  
Subcommittee on Social Security  
Committee on Ways and Means  
House of Representatives

Dear Mr. Reed,

The Social Security Administration (SSA) is responsible for delivering services that touch the lives of virtually every American. To do so, the agency relies on a variety of purchased goods and services, including information technology (IT) systems such as those that support the processing and payment of Disability Insurance and Supplemental Security Income benefits and facilitate the calculation and withholding of Medicare premiums. SSA obligates approximately \$1.5 billion annually on contracts.

Many of SSA's core IT systems are over 30 years old and have grown increasingly fragile and costly to maintain. Consequently, the agency has initiated numerous efforts to update its aging IT infrastructure and improve services. Over the 5-year period from fiscal year 2015 through 2019, approximately 65 percent of SSA's total obligations were related to IT products and services. You asked us to assess how SSA was implementing its contracting and acquisition processes. This report examines: (1) how SSA awards and oversees contracts for goods and services, and (2) the extent to which SSA has updated its acquisition guidance to address the role of contracting personnel in the agency's software development practices.

To assess how SSA contracts for goods and services, we reviewed the Federal Acquisition Regulation (FAR), and agency policy and guidance. We also interviewed officials from the Office of Acquisition and Grants (OAG), and the Office of Small and Disadvantaged Business Utilization, to discuss contract award and oversight procedures. We determined that the control activities component of internal control was significant to this objective, along with the underlying principles that management should design control activities to achieve its objective and respond to risks and implement control activities through policies. We conducted a contract file review to assess the extent to which SSA was implementing established policies and procedures for awarding and overseeing contracts. We

selected a non-generalizable sample of 27 contracts and task orders awarded from fiscal years 2014 through 2019 based on data in the Federal Procurement Database System-Next Generation (FPDS-NG). We selected our sample to include (1) the contract with the highest dollar value for each fiscal year, (2) contracts from the top four product and service categories for SSA procurements, and (3) a mix of contracts based on type (e.g., firm fixed-price, time-and-materials, and labor-hour contracts) (4) whether the contracts were competitive or non-competitive, and (5) the size of the businesses awarded contracts. For the contracts in our sample, we reviewed contract file documents and interviewed contracting officials to assess SSA's approach to acquisition planning, market research, competition, small business utilization, and oversight.

We also reviewed the FPDS-NG data for fiscal years 2014 through 2019 to determine SSA's competition rates—the percentage of total obligations reported under competitive contracts. We assessed how SSA evaluated contractor performance by reviewing relevant quality assurance surveillance plans and performance ratings from the Contractor Performance Assessment Reporting System (CPARS) for the contracts in our sample. We assessed the reliability of the federal contracting and CPARS data by (1) performing electronic testing of relevant data elements, (2) reviewing existing information about the data and the systems that produced them, and (3) collecting information from federal officials knowledgeable about the data. Based on these reviews, we found the data in both FPDS-NG and CPARS to be sufficiently reliable for our purposes.

To assess the extent to which SSA has updated its acquisition guidance to address the role of contracting personnel in software development, we assessed SSA's February 2019 acquisition handbook and supplemental guidance related to the role of contracting personnel. Because SSA is using an incremental software development approach called "Agile," we reviewed contract file documentation for the three IT support services contracts used to procure the services of Agile-trained contractors that were part of our sample. We reviewed this documentation, such as statements of work and acquisition plans, to determine how SSA's Agile approach was documented and the extent to which roles were identified for contracting personnel in Agile contracts. We reviewed SSA's June 2017 agency-wide Agile guidance and prior SSA Inspector General (IG) reports on the Disability Case Processing System (DCPS) to determine how SSA administered Agile related contracts and identified roles and

responsibilities for Agile contracts.<sup>1</sup> We also interviewed officials from SSA's Disability Case Processing System version 2 (DCPS2) program office to determine how they execute and oversee contracts for IT support services. Further, we reviewed DCPS's program roadmap to determine how SSA was planning for milestones. We also interviewed officials from SSA's OIG and contracting officials for the IT support services contracts to determine the role of contracting personnel in executing the IT support services contracts.

We assessed SSA's contracting approach against relevant leading practices for Agile software development.<sup>2</sup> In developing these leading practices, GAO reviewed information from a variety of sources related to Agile adoption and compiled a draft of leading practices commonly mentioned across these different sources. This included input from a working group of experts from the public and private sectors and academia. Based on this work, GAO developed a set of leading practices for Agile adoption. The key practices we identified to compare SSA's contracting approach for Agile were: (1) tailor contract structure and inputs to align with Agile practices and (2) integrate the program office and the developers. We selected these practices because they specifically focus on contracting for Agile software development.

We conducted this performance audit from July 2019 to July 2020 in accordance with generally accepted government auditing standards. 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 objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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<sup>1</sup>See for example Social Security Administration Office of the Inspector General, *The Social Security Administration's Cost and Schedule Estimates for the Disability Case Processing System*, A-14-18-50742 (Baltimore, MD; Dec. 2 2019) and *The Social Security Administration's Analysis of the Alternatives for the Disability Case Processing Systems*, A-14-16-50078 (Baltimore, MD: May 31, 2016).

<sup>2</sup>GAO's Agile Assessment Guide (June 2020 Final Draft). For an example of an agency's Agile practices that were assessed using these leading practices see GAO, *DHS Has Made Significant Progress in Implementing Leading Practices, but Needs to Take Additional Actions*, [GAO-20-213](#) (Washington, D.C: June 1, 2020).



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## Background

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### SSA's Contracting Function

SSA's contracting function is centralized within the OAG, the primary office responsible for developing contracting policies and procedures, appointing contracting officers, and awarding and overseeing contracts. The head of OAG reports to SSA's Deputy Commissioner for Budget, Finance, and Management. As of July 2019, SSA's OAG had roughly 125 staff, 95 of which were contracting officers, contract specialists, or purchasing agents, according to SSA officials. The remaining OAG employees were IT analysts and other specialists.

The contracting practices used by SSA are subject to the government-wide requirements of the FAR. In addition, OAG developed and maintains an acquisition handbook that provides guidance for agency contracting officials that supplements the FAR on specific contracting procedures including acquisition planning, market research, and competition, among other things.<sup>3</sup>

**Acquisition planning:** Acquisition planning is the process by which the efforts of personnel responsible for acquisition are coordinated and integrated through a comprehensive plan for fulfilling the agency need in a timely manner and at a reasonable cost. The process includes developing the overall strategy for managing the acquisition.<sup>4</sup> The FAR requires agencies to perform acquisition planning for all acquisitions to promote and provide for: acquisition of commercial items to the maximum extent practicable, competition, selection of appropriate contract type, and appropriate consideration of the use of pre-existing contracts before awarding new contracts. The SSA acquisition handbook specifies that written acquisition plans are required for all new open market awards and awards placed against other agency's contract vehicles (e.g., General Services Administration schedules) exceeding the simplified acquisition threshold, which is currently \$250,000. The extent of detail in the plans can be tailored to the acquisition. The SSA acquisition handbook states that written acquisition plans are not required for modifications to existing awards, task or delivery orders, or blanket purchase agreement calls

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<sup>3</sup>We used the Social Security Administration Acquisition Handbook issued February 2019 as the relevant governing regulation for this engagement.

<sup>4</sup>FAR §2.101.

placed against other agency-established contract vehicles. Generally, project and contracting officials share responsibility for acquisition planning activities.

**Market research:** Market research is the process of collecting and analyzing data about capabilities in the market that could satisfy an agency's procurement needs. It is a critical step in informing decisions about how best to acquire goods and services. The FAR and SSA's market research handbook state that agencies must conduct market research appropriate to the circumstances, such as soliciting for any new requirement. The FAR and SSA guidance state that the extent of market research will vary, depending on such factors as urgency, estimated dollar value, and complexity of the acquisition.<sup>5</sup> Market research allows the agency to determine if there are available sources capable of satisfying its requirements.

**Competition:** Federal law and acquisition regulations generally require that federal agencies award contracts through full and open competition.<sup>6</sup> Under full and open competition all responsible suppliers are provided an opportunity to submit offers and compete for the award of an agency's contracts. Moreover, an Office of Federal Procurement Policy memorandum has addressed the important role of competition in federal contracting, highlighting that competitively awarded contracts can help agencies save money, curb fraud, improve contractor performance, and promote accountability for results. The same point has been reflected in several GAO reports.<sup>7</sup> The FAR permits federal agencies to award contracts without full and open competition in certain circumstances, for example, when only one vendor can supply the requirement or when a sole-source award is made under specified small business programs.<sup>8</sup>

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<sup>5</sup>FAR § 10.002(a)(2). See also GAO, *Market Research: Better Documentation Needed to Inform Future Procurements at Selected Agencies*, [GAO-15-8](#) (Washington, D.C.: October 9, 2014).

<sup>6</sup>Competition in Contracting Act of 1984, Pub. L. No. 98-369, § 2701. (codified at 10 U.S.C. §2304 and 41 U.S.C. §3301).

<sup>7</sup>Office of Federal Procurement Policy Memo, Paul A. Denett, *Enhancing Competition in Federal Acquisition*, May 31, 2007. See for example GAO, *Federal Contracting: Opportunities Exist to Increase Competition and Assess Reasons When Only One Offer Is Received*. [GAO-10-833](#) (Washington, D.C.: July 26, 2010), GAO, *Defense Contracting: Early Attention in the Acquisition Process Needed to Enhance Competition*. [GAO-14-395](#) (Washington, D.C.: May 5, 2014).

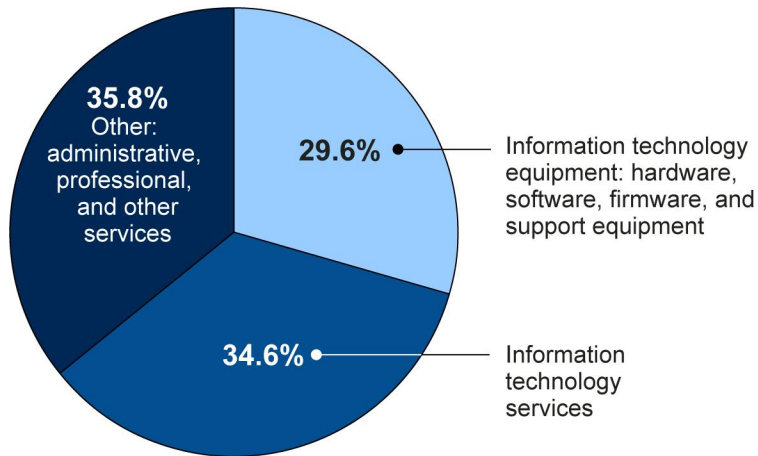
<sup>8</sup>FAR Subpart 6.3 contains seven circumstances in which a contract can be awarded without providing for full and open competition.

When using full and open competition after exclusion of sources, agencies may solicit more than one source, for example when setting aside the requirement to be competed among small businesses.

### SSA’s IT Contracting and Modernization Efforts

SSA relies heavily on IT resources to handle millions of transactions and maintain records for the millions of beneficiaries and recipients of its programs. From fiscal year 2015 through 2019, SSA obligated about 65 percent of its \$8.3 billion in total obligations on IT products and services compared with about 16 percent at other civilian agencies. See figure 1 for a breakdown of SSA’s contracting obligations for IT-related and other goods and services during fiscal years 2015 through 2019.

**Figure 1: Social Security Administration’s Fiscal Year 2015-2019 Contracting Obligations for Goods and Services**



Source: GAO analysis of Federal Procurement Data System-Next Generation data. | GAO-20-627

**Data table for Figure 1: Social Security Administration’s Fiscal Year 2015-2019 Contracting Obligations for Goods and Services**

Other: administrative, professional, and other services	Information technology services	Information technology equipment: hardware, software, firmware, and support equipment
35.8	34.6	29.6

To address aging and inefficient systems, SSA management identified IT modernization as a priority in its Agency Strategic Plan, Fiscal Years 2018-2022 and its Information Resources Management Strategic Plan 2016-2019. Also, in 2017, SSA developed an IT Modernization Plan. The

agency invests about \$1 billion annually, including labor and IT purchases, in efforts to eliminate legacy systems and reduce reliance on old mainframe architectures.<sup>9</sup> The modernization plan allows for the use of Agile software development practices and acknowledges the need to use contractors to fill critical skills gaps in SSA's IT workforce.

Agile software development is a framework for incremental software development where requirements are less defined, in contrast with a traditional approach that lays out a defined need and detailed fixed technical requirements for the program. Agile programs depend on having the flexibility to add staff and resources to complete each release and adapt each software release quickly, based on lessons learned from one release to the next. Given the challenges agencies have faced in implementing an Agile approach for software development,<sup>10</sup> we developed a draft Agile Assessment Guide to provide best practices for agencies to consider as they implement an Agile approach to software development.<sup>11</sup>

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## Prior GAO Recommendations Related to SSA's IT Acquisitions and Small Business Contracting

Since 2008, we have made a number of recommendations to address various challenges that SSA has faced involving IT acquisitions and to help ensure compliance with certain statutory requirements related to small businesses. For example, in April 2012, we recommended that SSA update its IT strategic plan to include results-oriented goals, strategies, milestones, and performance measures, and use this plan to guide and

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<sup>9</sup>Social Security Administration, *IT Modernization Plan: A Business and IT Journey* (October 2017). Per SSA's acquisition handbook, the Chief Information Officer (CIO) in the Office of the Deputy Commissioner for Systems is required to review and approve all IT-related acquisition written plans, which are completed by OAG contract specialists before a component submits a requisition package to OAG for any acquisition associated with a large Advance Procurement Plan.

<sup>10</sup>See for example, GAO, *Space Command and Control: Comprehensive Planning and Oversight Could Help DOD Acquire Critical Capabilities and Address Challenges*, [GAO-20-146](#) (Washington, D.C.: October 30, 2019); GAO, *Agile Software Development: DHS Has Made Significant Progress in Implementing Leading Practices, but Needs to Take Additional Actions*, [GAO-20-213](#). (Washington, D.C: June 1, 2020).

<sup>11</sup>GAO's Agile Assessment Guide (June 2020 Final Draft).

coordinate IT modernization projects and activities.<sup>12</sup> SSA updated its IT strategic plan to include these key elements in response to this recommendation. In January 2018, we recommended that SSA (1) issue guidance to ensure that IT-related acquisitions are properly identified, (2) ensure that the office of the senior procurement executive is involved in that identification process, and (3) ensure that IT acquisition plans or strategies are reviewed and approved according to the Office of Management and Budget's guidance.<sup>13</sup> SSA concurred with these recommendations and updated its acquisition handbook in May 2019 to include a definition of IT to assist in identifying IT acquisitions. Further, as of July 2018, SSA implemented procedures for its Chief Information Officer, or a designee, to review and approve IT acquisition plans.

In August 2017, we reported on SSA's compliance with Section 15(k) of the Small Business Act, which establishes an Office of Small and Disadvantaged Business Utilization in each federal agency with procurement powers. This office advocates for small businesses in the procurement and contracting processes.<sup>14</sup> We found that SSA did not demonstrate compliance with six requirements of Section 15(k) and recommended that SSA comply with the requirements or report to Congress on why it was not in compliance, including seeking any statutory flexibilities or exceptions believed appropriate.<sup>15</sup> As of June 2020, SSA had not submitted a report to Congress outlining how it will comply. SSA officials told us in February 2020 that they were seeking a waiver from the Congress for some of the requirements due to the small size of their agency.

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<sup>12</sup>GAO, *Social Security Administration: Improved Planning and Performance Measures Are Needed to Help Ensure Successful Technology Modernization*. [GAO-12-495](#) (Washington, D.C.: April 26, 2012).

<sup>13</sup>GAO, *Information Technology: Agencies Need to Involve Chief Information Officers in Reviewing Billions of Dollars in Acquisitions*, [GAO-18-42](#) (Washington, D.C.: Jan. 10, 2018).

<sup>14</sup>15 U.S.C. § 644(k).

<sup>15</sup>GAO, *Small Business Contracting: Actions Needed to Demonstrate and Better Review Compliance with Select Requirements for Small Business Advocates*, [GAO-17-675](#) (Washington, D.C.: Aug. 25, 2017).

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## SSA's Approach to Awarding and Overseeing Contracts Varies Based on Contract Type and Dollar Value

The approach followed by the Social Security Administration (SSA) in awarding and overseeing contracts generally aligns with the requirements we reviewed. For the 27 contracts and orders we reviewed, we found that SSA's approach to awarding and overseeing contracts varied based on factors such as contract type and dollar value. SSA's acquisition planning for high dollar value acquisitions included documentation of specific risks. In addition, SSA varied its market research by the estimated dollar value of the acquisition. SSA's competition rate has increased since 2015, in part due to the more recent, competitively awarded high dollar IT contracts. SSA met its annual small business prime contracting goals in some of the fiscal years between 2015 through 2019, and uses various tools to monitor and to report on contractor performance.

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## SSA Conducted Acquisition Planning as Required and Included Documentation of Risk

The FAR states that the specific content of acquisition plans will vary, depending on the nature, circumstances, and stage of the acquisition. The FAR states that the acquisition plan should discuss technical, cost, and schedule risks and describe what efforts are planned or underway to reduce risk and the consequences of failure to achieve goals. SSA's guidance requires written acquisition plans for all new market awards and awards placed against other agencies' contract vehicles (i.e., General Services Administration schedules, government-wide acquisition contracts) over the simplified acquisition threshold, which for SSA is currently of \$250,000. We found that all of the competed contracts we reviewed above the simplified acquisition threshold had written acquisition plans as required. Some plans contained discussion of acquisition risk and the rationale for selecting a certain type of contract. The discussion and documentation of risk varied by contract type.

**Use of Time-and-Materials Contracts:**

From fiscal year 2015 to 2019, the Social Security Administration (SSA) obligated an average of 22.7 percent of its contract dollars on time-and-material contracts compared with an average of 10.5 percent for other civilian agencies' obligations.

Source: GAO analysis of Federal Procurement Data System-Next Generation information. | GAO-20-627

For example, the acquisition plan for the three IT support services contracts we reviewed each contained maximum order limitations that, when combined, totaled \$7.8 billion. The acquisition plan stated that SSA could not acquire the services using entirely performance-based acquisition methods, let alone establish performance standards because the nature of the work the contractor would perform could not be clearly defined in terms of outcomes. Because of the rapidly changing IT environment, SSA could not develop performance measures that are objective, measurable, realistic, and clearly stated. The acquisition plan, however, stated that SSA would attempt to identify work that could be defined, and that the work would be described in terms of required results that are clear, specific, and have objectives with measurable outcomes. As such, the acquisition plan proposed to make multiple awards of indefinite-delivery indefinite-quantity contracts with firm, fixed-price, time-and-material, and labor-hour task orders.<sup>16</sup> The acquisition plan acknowledged the risks to the government associated with time-and-materials and labor hour contracts. As such, the acquisition plan stated that the contracting officer's technical representative would provide increased monitoring to mitigate risk. We have stated in a prior GAO report that time-and-materials contracts are considered high risk for the government because the contractor's profit is tied to the number of hours worked and the government bears the risk of cost overruns. Due to these risks, the FAR directs that these contracts only be used when it is not possible at the time of award to estimate accurately the extent or duration of the work or to anticipate the costs with any reasonable degree of confidence.<sup>17</sup> SSA officials told us that they use time-and-materials and labor-hour contracts for their IT awards, in particular, because of the unique requirements associated with IT development that make it difficult to use a firm, fixed-price contract type.

SSA also planned for the three IT services indefinite delivery, indefinite quantity contracts to allow for competitive task orders to be awarded (unless an exception applies) over the potential 10-year period of performance. Specifically, the plan stated that as new requirements are developed, SSA would provide the three awardees a fair opportunity to compete (unless an exception applies) by providing them with an estimated level of effort for the proposed task(s) and allowing them to

<sup>16</sup>An indefinite delivery, indefinite quantity contract provides for an indefinite quantity, within stated limits, of supplies or services during a fixed period.

<sup>17</sup>See FAR § 16.601(c).

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propose the appropriate labor mix and level of effort necessary to successfully complete the task(s).

The contracting officer's representative and contract specialist generally share responsibility for acquisition planning activities at SSA. OAG contracting officials noted that SSA implements a more thorough acquisition planning process for its high dollar value and complex acquisitions. For example, SSA contracting officials we met with stated that OAG coordinates regular acquisition "boot camp" events to provide training on topics such as writing statements of work and developing evaluation criteria to team early in their acquisition planning. SSA officials noted that teams involved in more complex IT-related acquisitions participated in these events.

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## SSA Conducted Market Research in Accordance with the FAR

Based on the 27 SSA contracts we reviewed, we found that SSA conducted and documented market research in accordance with the FAR.<sup>18</sup> The approaches varied by the estimated dollar value of the contract. Specifically, we found that SSA conducted market research for awards above the simplified acquisition threshold and included industry engagement such as requests for information, industry days, and pre-award conferences to determine the capabilities of the marketplace. For example, market research for two of SSA's IT support services contracts—valued at an estimated \$3.1 billion and \$2.4 billion, respectively—included a Request for Information published on the Federal Business Opportunities website that resulted in the submission of eight proposals under the solicitation for these requirements. SSA's Associate Commissioner for Acquisitions and Grants said that market research techniques, such as requests for information, inform businesses of SSA's pending requirements and enable SSA to receive better information because businesses have time to react to solicitations. In addition, SSA's contracting officials released a draft solicitation for SSA's IT support services contracts, including a draft statement of work, in advance of an IT industry day to garner interest and awareness of SSA's requirements.

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<sup>18</sup>FAR § 2.1 defines market research as the process used to collect and analyze information about capabilities in the market that could satisfy an agency's needs.



The contracts in our sample below the simplified acquisition threshold of \$250,000 were generally under the Federal Supply Schedule, including those issued pursuant to blanket purchase agreements. We found that SSA market research for these orders mainly consisted of more straightforward approaches such as government-wide database searches. For example, a contracting officer renewing a maintenance agreement for commercial IT software with an estimated value of \$13,000 conducted market research using the General Services Administration's online purchasing and ordering tools Advantage and e-Buy.

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### SSA's Competition Rate Increased from Fiscal Year 2015 to 2019

From fiscal year 2015 to 2019, SSA's competition rate increased by nearly 20 percentage points—from 58.2 percent to 77.7 percent.<sup>19</sup> Moreover, an Office of Federal Procurement Policy memorandum has addressed the important role of competition in federal contracting, highlighting that competitively awarded contracts can help agencies save money, curb fraud, improve contractor performance, and promote accountability for results. The same point has been reflected in several GAO reports.<sup>20</sup> We previously reported that SSA's competition rate was the lowest among civilian agencies in fiscal year 2015.<sup>21</sup> Based on our analysis of FPDS-NG data, we found that nearly 30 percent of the agency's fiscal year 2015 obligations were allocated to non-competitively award IT-related products and services contracts. However, as previously noted, SSA awarded three IT support services contracts under full and open competition each containing maximum order limitations that, when combined, totaled \$7.8 billion and plans to compete and award task orders from 2017 through 2026 utilizing these contracts. SSA officials cited the agency's dependency on legacy IT systems and ongoing efforts to modernize them as factors influencing its competition rate. More

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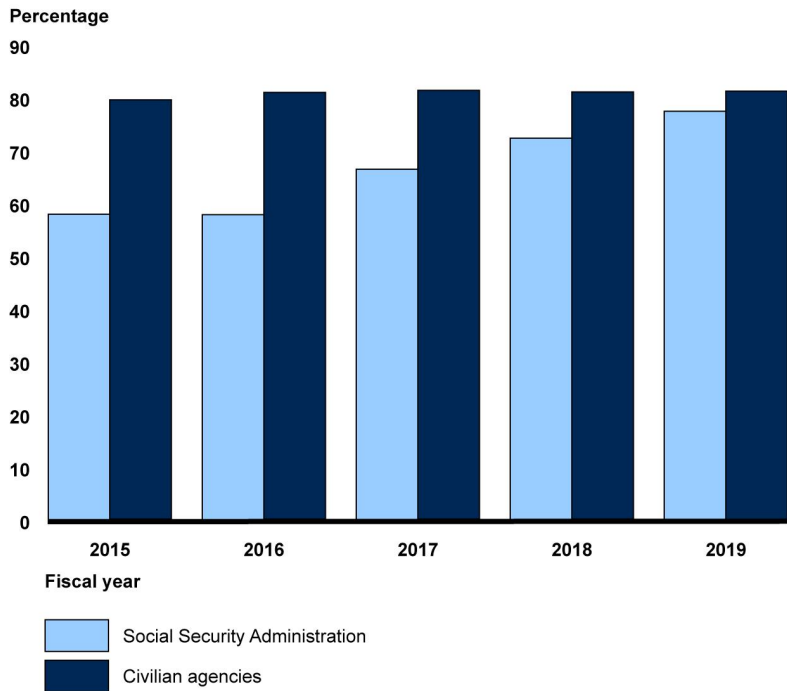
<sup>19</sup>We define competition rates as "the percentage of dollars obligated annually through competitive contracts and task orders to dollars obligated to all contracts and task orders, including those awarded in prior years." This overall competition rate includes all contracts and task orders where competitive procedures were used regardless of the number of offers received.

<sup>20</sup> See for example GAO, *Federal Contracting: Opportunities Exist to Increase Competition and Assess Reasons When Only One Offer Is Received*. [GAO-10-833](#) (Washington, D.C.: July 26, 2010).

<sup>21</sup> GAO, *Contracting Data Analysis: Assessment of Government-Wide Trends*. [GAO -17-244SP](#) (Washington, D.C.: March 9, 2017).

recently, SSA’s fiscal year 2019 competition rate of 77.7 percent is comparable to the average competition rate of 80.8 percent reported across all civilian agencies during this time period, as reflected in Figure 2.

**Figure 2: Social Security Administration and U.S. Civilian Agencies Annual Percentage of Competitively Awarded Contract Obligations from Fiscal Year 2015 through 2019**



Source: GAO presentation of Federal Procurement Data System-Next Generation information. | GAO-20-627

**Data table for Figure 2: Social Security Administration and U.S. Civilian Agencies Annual Percentage of Competitively Awarded Contract Obligations from Fiscal Year 2015 through 2019**

	Social Security Administration	Civilian
2015	58.2	79.4
2016	58.1	80.8
2017	66.7	81.2
2018	72.6	80.9
2019	77.7	81.5

i. Using data from FPDS-NG, we measured SSA’s and other civilian agencies’ annual competition rate as the percentage of the agency’s total obligations reported under competitively-awarded contracts for fiscal years 2015 to 2019.

Out of the 27 contracts we reviewed, 10 were awarded non-competitively<sup>22</sup> and supported by written justifications, where required, that addressed the legal basis for awarding to a single source. The most common justification for the 10 non-competitively awarded contracts in our sample was that there was only one vendor capable and no other supplies or services would satisfy agency requirements.<sup>23</sup> Examples from our sample include:

- A 10-year, \$810 million contract to procure 12 replacement computer mainframe systems, related components, and warranty and maintenance support. The justification for other than full and open competition notes that many of the computer programs SSA uses to administer and execute agency business functions depend on a proprietary computer mainframe system for which there is only one manufacturer.
- A contract with an estimated value of \$57.8 million for ongoing software engineering and maintenance services to maintain the agency's Electronic Disability Case Processing System (eDIB). This system relies on proprietary software code for which only the original equipment manufacturer can provide ongoing engineering and maintenance services.
- A 5-year, \$707,625 contract awarded to the state of Louisiana for electronic death registration records. This contract was one of 53 SSA awarded to each of the 50 states, as well as the District of Columbia, Puerto Rico, and New York City, which in total are valued at \$39.7 million. SSA's mission is unique in that the agency must obtain birth and death record information for social security benefits, for which individual states and jurisdictions are the only sources.

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<sup>22</sup>We identified through the Federal Procurement Data System-Next Generation (FPDS-NG) SSA obligations under competitive and noncompetitive contracts in fiscal years 2015 through 2019, the most recent data available at the time of our review. We identified obligations to noncompetitive contracts primarily through the "extent competed" and "fair opportunity/limited sources" fields in FPDS-NG. These fields include contracts coded as not competed or not available for competition, and noncompetitive task or delivery orders. As a result, and for the purposes of this report, we defined noncompetitive obligations to include obligations through contracts that were awarded using the exceptions to full and open competition in FAR Subpart 6.3, and orders issued under multiple award indefinite delivery, indefinite quantity contracts under the exceptions to the fair opportunity process in FAR 16.505(b) or under limited sources provisions for orders issued under GSA's schedules program in FAR Subpart 8.405-6. Even for contracts identified as non-competitive, agencies may have solicited more than one source.

<sup>23</sup> FAR §6.302-1.

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## SSA Met its Annual Small Business Prime Contracting Goals in Two of Four Fiscal Years

Using data obtained from Small Business Administration (SBA) for fiscal years 2015 through 2018, we found that SSA met the annual small business prime contracting goals it negotiated with SBA based on the percentage of total prime contract dollars awarded to small businesses in two of four fiscal years.<sup>24</sup> SSA exceeded its overall small business prime contracting goal in fiscal years 2015 and 2018, and missed its prime contracting goal by less than one-tenth of a percent in fiscal year 2016, as shown in table 1.

Congress required the President to establish annual government-wide statutory goals for various socioeconomic subcategories of small business. These small business subcategories are small disadvantaged businesses, women-owned small businesses, service-disabled veteran-owned small businesses, and businesses owned in Historically

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<sup>24</sup>The SBA negotiates annual small business prime contracting goals with each federal agency to meet, in the aggregate, the federal government's annual government-wide small business prime contracting goals. Since 1997, Congress has set an annual goal of awarding at least 23 percent of the total value of all small business eligible prime contract awards to small businesses.

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Underutilized Business Zones (HubZone).<sup>25</sup> In fiscal year 2017, the agency missed its overall small business goal by roughly 3.5 percent. Additionally, Table 1 shows that SSA met SBA's goals for specific socioeconomic categories except those established for women-owned and service-disabled veteran-owned small businesses in fiscal years 2016 and 2015, respectively, and HubZones from fiscal years 2015 to 2018.

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<sup>25</sup>Small disadvantaged business concerns are small business concerns under the size standard applicable to the acquisition, that (1) are at least 51 percent unconditionally and directly owned by one or more socially disadvantaged and economically disadvantaged individuals who are citizens of the United States; and each individual claiming economic disadvantage has a net worth not exceeding \$750,000 after taking into account the applicable exclusions set forth at 13 CFR §124.104(c)(2); and (2) these individuals control the management and daily business operations. Women-owned small business concerns are small business concerns that are at least 51 percent owned by one or more women; or, in the case of any publicly owned business, at least 51 percent of the stock of which is owned by one or more women; and whose management and daily business operations are controlled by one or more women; or small business concerns eligible under the Women-Owned Small Business Program in accordance with 13 CFR part 127 (see subpart 19.15). Service-disabled veteran-owned small business concerns are small business concerns (1) not less than 51 percent of which are owned by one or more service-disabled veterans or, in the case of any publicly owned business, not less than 51 percent of the stock is owned by one or more service-disabled veterans; and (2) the management and daily business operations of which are controlled by one or more service-disabled veterans or, in the case of a service-disabled veteran with permanent and severe disability, the spouse or permanent caregiver of such veteran. Service-disabled veteran means a veteran, as defined in 38 U.S.C. §101(2), with a disability that is service-connected, as defined in 38 U.S.C. §101(16). HUBzZones are (1) qualified census tracts, which are determined generally by area poverty rate or household income; (2) qualified nonmetropolitan counties, which are determined generally by area unemployment rate or median household income; and (3) lands meeting certain criteria within the boundaries of an Indian reservation. HUBZone Act of 1997, Pub. L. No. 105-135, Title VI, 111 Stat. 2592, 2627-2636 (codified in several sections, as amended, in title 15, United States Code). By statute, qualified census tracts are generally those the Secretary of the Department of Housing and Urban Development designates for the Low-Income Housing Tax Credit program.

**Table 1: SSA’s Annual Small Business Prime Contracting and Socioeconomic Subcategory Goals and Actuals for Fiscal Years 2015 through 2018**

Fiscal Year	Overall Small Business Prime Contracting Utilization Rate		Socioeconomic Sub-category Percentages							
			Women-Owned		Small and Disadvantaged		Service-Disabled Veteran-Owned		HubZone	
	Goal	Actual	Goal	Actual	Goal	Actual	Goal	Actual	Goal	Actual
2015	33.5	39.76	5.0	12.94	5.0	9.64	3.0	2.85	3.0	<b>1.31</b>
2016	36.75	<b>36.67</b>	5.0	<b>3.39</b>	5.0	8.68	3.0	3.16	3.0	<b>1.57</b>
2017	37.05	<b>33.57</b>	5.0	8.87	5.0	10.88	3.0	3.40	3.0	<b>1.40</b>
2018	31.0	36.13	5.0	7.65	5.0	8.7	3.0	4.21	3.0	<b>1.03</b>

Source: GAO presentation of the Social Security Administration’s (SSA) Small Business Procurement Scorecard for fiscal years 2015 through 2018. | GAO-20-627

Note: As of June 2020, the Small Business Administration had not yet published the small business contracting goals and actuals for each federal agency for fiscal year 2019. Those “actual” rates that are bolded indicate years SSA did not meet its goals.

OAG officials and officials within SSA’s Office of Small and Disadvantaged Business Utilization stated that SSA has efforts in place to help ensure the agency meets its future small business contracting goals. For example, the officials said that the contracting and small business offices are co-located, which enables officials to meet regularly to discuss the agency’s small business contracting goals and progress toward achieving them, while also identifying upcoming and ongoing contracting actions suitable for small business participation. Additionally, to ensure small businesses are afforded equal opportunity to compete for contract awards, SSA’s acquisition handbook requires the Office of Small and Disadvantaged Business Utilization to conduct a pre-solicitation review for all new or re-competed contracts with an estimated value exceeding the \$250,000 simplified acquisition threshold. However, SSA officials acknowledged that the office is not in compliance with the requirement in Section 15(k)(2) of the Small Business Act that requires the Office of Small and Disadvantaged Business Utilization Director be the equivalent of a senior procurement executive. The head of the office also does not currently report to the head of the agency or deputy head, which is also required by Section 15(k)(3). As previously noted, in 2017 we recommended that SSA comply with these requirements or report to Congress on why they were not in compliance—SSA has since requested a waiver from the Congress regarding these two requirements.

SSA contracted with small businesses for 10 of the 27 contracts included in our review. These contracts were awarded to procure new computers and printers and acquire security services, among other things. Also, the three IT support services contracts in our sample contained small

business sub-contracting plans.<sup>26</sup> We reviewed data from the Electronic Subcontracting Reporting System for two of these contracts and found both had exceeded their 50 percent subcontracting goal for the review period of August 21, 2017 through September 30, 2019, awarding 58.3 and 53.4 percent of their subcontractor obligations to small business subcontractors, respectively.

Additionally, three of the contracts in our sample were competitively awarded as small business set asides. The FAR requires agencies to set aside procurements for small businesses for acquisitions that have an anticipated dollar value above the micro-purchase threshold,<sup>27</sup> but not over the simplified acquisition threshold.<sup>28</sup> For example, SSA planned to compete its requirement for security escort service personnel to monitor construction workers during renovations at SSA field offices. SSA issued a blanket purchase agreement with an estimated value of \$40.7 million against a Service-Disabled Veteran-Owned Small Business' GSA Federal Supply Schedule contract.

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<sup>26</sup>Section 8(d) of the Small Business Act (15 U.S.C. 637(d)) imposes, with certain exceptions, requirements regarding subcontracting with small businesses and small business subcontracting plans. For example, in negotiated acquisitions each solicitation of offers to perform a contract that is expected to exceed \$700,000 (\$1.5 million for construction) and that has subcontracting possibilities, must require the apparently successful offeror to submit an acceptable subcontracting plan. FAR §19.702(a)(1)(i). Each subcontracting plan must include, among other things, separate percentage goals for using small business (including Alaska Native Corporation and Indian tribes), veteran-owned small business, service-disabled veteran-owned small business, HUBZone small business, small disadvantaged business (including Alaska Native Corporation and Indian tribes) and women-owned small business concerns as subcontractors; and a statement of the total dollars planned to be subcontracted and a statement of the total dollars planned to be subcontracted to small business (including all small business subcategories mentioned above) as a percentage of total subcontract dollars. FAR §19.704(a)(1)(2). If the apparently successful offeror fails to negotiate a subcontracting plan acceptable to the contracting officer within the time limit prescribed by the contracting officer, the offeror will be ineligible for award. FAR §19.702(a)(1)(i).

<sup>27</sup>FAR 2.101 defines the micro-purchase threshold generally as \$3,500, although section 806 of the National Defense Authorization Act for Fiscal Year 2018, Pub. L. No. 115-91, increased the threshold to \$10,000 for civilian agencies. See 84 Fed. Reg. 52420, (Oct. 2, 2019) (proposed rule).

<sup>28</sup>FAR §§6.203, 19.502-2.

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## SSA's Approach to Monitoring and Reporting on Contractor Performance Varied Depending on the Dollar Value and Complexity of the Contract

We found that SSA's approach for monitoring contractor performance aligned with federal requirements in that it varied depending on the estimated dollar value and complexity of the good or service procured. FAR § 46.201(a) states that a contracting office can include in solicitations and contracts the appropriate quality requirements. The type and extent of contract quality requirements needed depends on the particular acquisition and may range from inspection at time of acceptance to a requirement for the contractor's implementation of a comprehensive program for controlling quality. For example, SSA awarded a \$30,860 purchase order for the continued provision and maintenance of software used to develop documents that are accessible to people with disabilities, which stated the contractor must only accept those items that conform to the requirements of the contract and the government reserves the right to inspect or test any supplies or services that have been accepted. We also reviewed SSA's issuance of a blanket purchase agreement with an estimated value of \$137 million against a firm's General Service Administration Federal Supply Schedule contract for laptops and related peripheral equipment, hardware, and installation services, in which the statement of work included specific contractor reporting requirements, such as providing summary reports on installation completion and order status.

Further, we found that SSA implemented more extensive quality assurance requirements for procurements we reviewed that were more complex in nature, such as those that provided key services. For example, we reviewed one \$2.7 million contract in which SSA acquired background investigation services. The contract contained a quality assurance surveillance plan intended to minimize technical performance risk as outlined in the statement of work.<sup>29</sup> For example, the quality assurance surveillance plan outlined specific quality requirements and timeliness standards that the investigations would be evaluated against.

Consistent with the FAR, SSA reports contractor performance on an interim and final basis and the ratings are available to other federal agencies through CPARS. Based on our review of CPARS reports for

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<sup>29</sup> FAR 46.4



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SSA contracts in our sample, SSA officials rate the contractor on various elements such as the quality of the product or service delivered, schedule timeliness, and cost control.<sup>30</sup>

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## SSA Has Not Revised its Guidance to Reflect the Role of Contracting Personnel in Software Development Efforts

In 2017, SSA issued an IT modernization plan that states that SSA will use an Agile approach for software development to accomplish its IT modernization goals and that it will use contractors to fill a critical skills gap in its IT workforce. To support these efforts, SSA awarded three IT support services contracts in 2017. These multiple-award indefinite delivery, indefinite quantity contracts are intended to provide critical technical skills to supplement SSA's IT professionals by supporting a number of initiatives, including modernizing IT software and making processes more efficient. These contracts allow for the issuance of task orders which SSA uses to acquire contractor labor and skills not available in the agency.

One of SSA's most significant and expensive IT modernization efforts that uses these support contracts and an Agile software development approach is the Disability Case Processing System (DCPS). DCPS is intended to improve the speed and quality of the disability determination process and reduce infrastructure costs by phasing out legacy systems at the state level. After a costly and failed attempt to contract out for the development of this system starting in 2010 using a traditional software development approach, SSA discontinued the program in 2015. Based on an analysis of alternatives, SSA determined that it would be more efficient for SSA to manage the program using an Agile approach with support from contractors rather than contracting out the entire effort as it had done previously. According to our Agile assessment guide, an Agile approach emphasizes iterative product development and delivery; that is, development of software in iterations that are being continuously evaluated on their functionality, quality, and customer satisfaction.

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<sup>30</sup>FAR 42.1501 provides that past performance information (including the ratings and supporting narratives) is relevant information, for future source selection purposes, regarding a contractor's actions under previously awarded contracts or orders.

In October 2015, SSA re-started development of DCPS. DCPS version 2 (DCPS2) is managed by a program office, but the SSA IG reported in December 2019 that the project has continued to face delays. DCPS2 program office officials said that contractors work in teams led by SSA staff and are assisting in software development workloads. As of December 2019, the DCPS2 program had spent approximately 68 percent of its total labor costs on contractor support. To guide the program since 2015, the DCPS2 program office has followed Agile methodologies for the product roadmap to provide short-term software milestones. DCPS2 program officials told us that SSA, not the contractors, is responsible for meeting program milestones. In March 2019, SSA reported to Congress that product development for DCPS2 would be completed in September 2019, based on its DCPS2 roadmap. In July 2020, DCPS2 program office officials stated that SSA completed primary product development in September 2019 and is delivering functionality for all major claims types at all levels and that SSA is finalizing plans to use DCPS2 nationally. The SSA IG reported in December 2019 that it was not able to determine when SSA would be able to provide the functionality in DCPS2 needed to enable disability determination services to completely stop using their existing case processing systems. The IG report also highlighted delays of more than a year in implementing various phases of the project since switching to the Agile approach in October 2015.<sup>31</sup>

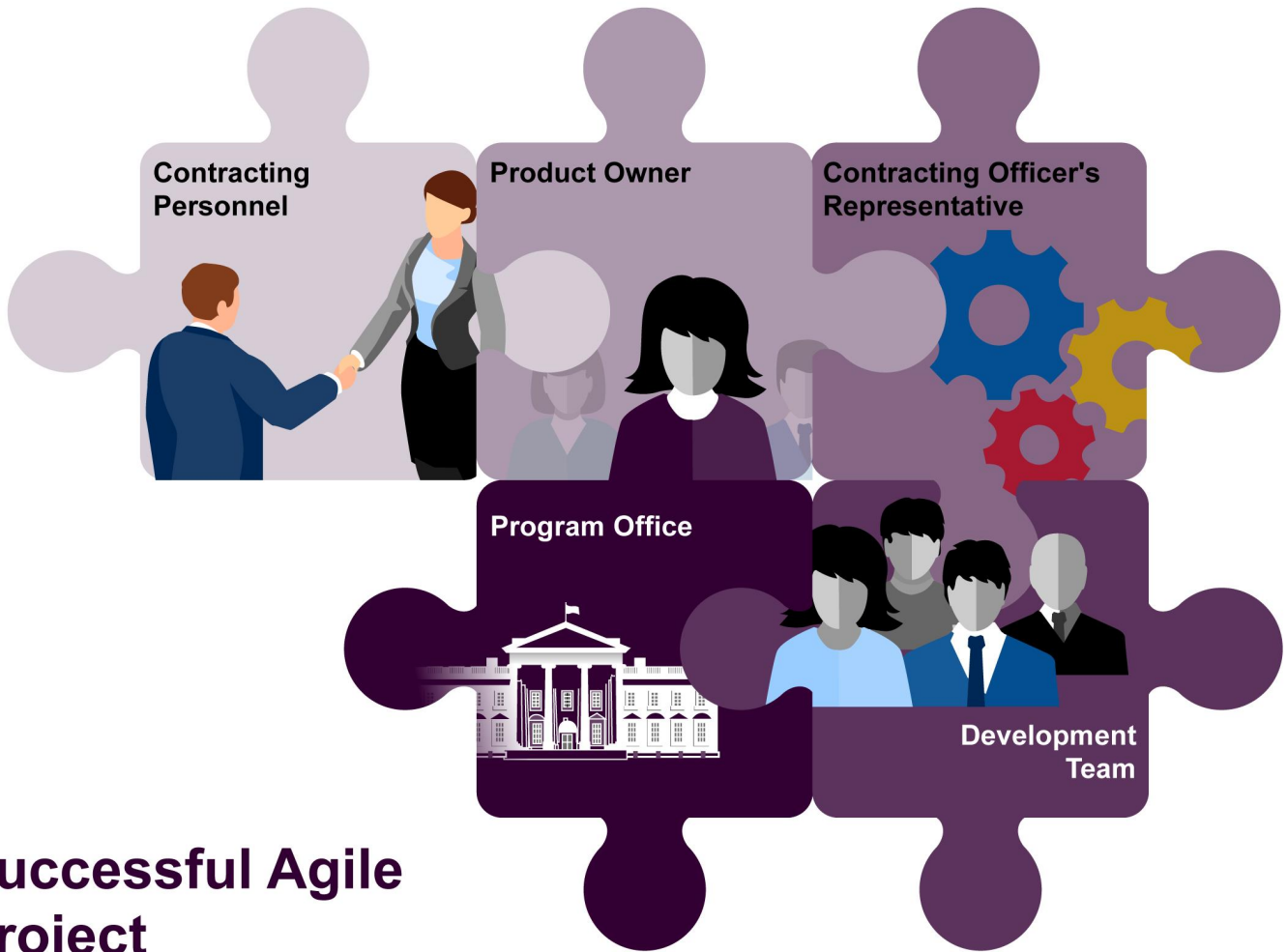
Given the complexity and pace of Agile programs, contracting leading practices for Agile adoption state that clearly defined roles and responsibilities to promote effective contract oversight and management are critical to successful program outcomes. SSA's Chief Information Officer developed a high-level Agile policy document in 2017 that identifies principles for Agile software development. SSA also developed guidance addressing the roles and responsibilities for Agile team members, including the project owner, developers, and testers. However, the guidance does not identify the role of contracting officials, including contracting officers and contracting officer's representatives (COR), in its discussion of the execution and oversight of a successful Agile project. SSA officials told us they did not think they needed to specify the roles given that the contractors were only responsible for providing services. However, according to leading practices for Agile adoption, key roles in Agile IT development include the program office, product owner,

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<sup>31</sup>Social Security Administration Office of the Inspector General, *The Social Security Administration's Cost and Schedule Estimates for the Disability Case Processing System*, A-14-18-50742 (Baltimore, MD; Dec. 2 2019).

contracting personnel, and development team. Figure 3 illustrates the key roles when planning, managing, and executing an Agile contract.

Figure 3: Roles When Planning, Managing, and Executing an Agile Contract



## Successful Agile Project

Source: GAO. | GAO-20-627

A leading practice identified in our Agile Assessment Guide notes that the role of the product owner and the contracting officer's representative should be identified to avoid overlap and confusion which can result in bottlenecks and poor outcomes. For example, using an Agile approach, the product owner approves the work delivered by the team, which is a responsibility typically performed by the COR on a traditional software

development contract. Our Agile guide discusses the role of contracting personnel, including the contracting officer and the COR, in the contract process and states that they should be fully aware of any changes to contract execution that may also impact the contract, such as changes to program milestones. The product owner is typically associated and familiar with the business aspects of the program office, while the COR has more technical skills. According to the guide, the product owner and COR are to work closely to align the program's business and technical requirements. Further, leading practices state that dedicated contracting personnel should work closely with the developers and the product owner. Additionally, these leading practices state that the product owner should be able to make decisions quickly and prioritize requirements within the scope of the program road map. In a program such as DCPS which is reliant on contractors and where requirements are in flux, clearly identifying these roles in acquisition guidance especially important.

By contrast, SSA's acquisition handbook and Agile guidance does not address the role of contracting officials—either contracting officers or CORs in an IT acquisition using an Agile process. SSA's acquisition handbook contains information on the roles of contracting personnel; however it does not specify that each acquisition using Agile processes should identify the role of contracting personnel, as recommended in the leading practices. Identifying the role of contracting personnel in the Agile processes in relevant guidance would help provide contracting personnel the information needed to provide effective oversight, and help manage changing requirements.

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## Conclusions

SSA has acknowledged that IT modernization is a key focus of the agency in its agency strategic plan and developed a separate plan to guide modernization efforts. SSA has faced challenges in managing its IT investments, including one of its most extensive IT modernization efforts—DCPS. SSA's IT modernization plan states that SSA will use an Agile methodology for software development to accomplish its IT modernization goals, and the agency is using this approach to build the new DCPS program. However, SSA has not identified the role of contracting personnel in the Agile development process. Identifying a role for contracting personnel in the Agile process in relevant guidance should better position SSA to achieve its IT modernization goals and provide appropriate levels of oversight.

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## Recommendation for Executive Action

- The Commissioner of the Social Security Administration should ensure the Office of Acquisition and Grants, in consultation with the Chief Information Officer, revises relevant guidance to identify the role of contracting officials in the Agile software development process.

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## Agency Comments

We provided a draft of this report to SSA for review and comment. In its written comments, reproduced in appendix I, SSA agreed with our recommendation. SSA also provided technical comments, which we incorporated as appropriate.

As agreed with your offices, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the report date. At that time, we will send copies to the appropriate congressional committees, the Commissioner of the Social Security Administration, and other interested parties. In addition, the report will be available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-4841 or [woodsw@gao.gov](mailto:woodsw@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in Appendix II.

Sincerely yours,



William T. Woods  
Director, Contracting and National Security Acquisitions

# Appendix I: Comments from the Social Security Administration



**SOCIAL SECURITY**  
Office of the Commissioner

July 27, 2020

Mr. William Woods  
Director, Contracting and National Security Acquisitions Team  
United States Government Accountability Office  
441 G Street, NW  
Washington, DC 20548

Dear Director Woods,

Thank you for the opportunity to review the draft report, "SOCIAL SECURITY CONTRACTING: Relevant Guidance Should be Revised to Reflect the Role of Contracting Personnel in Software Development" (GAO-20-627). We appreciate your acknowledgment that our approach to awarding and overseeing contracts aligns with federal requirements. We agree with the recommendation.

If you have any questions, please contact me at (410) 965-9704. Your staff may contact Trae Sommer, Director of the Audit Liaison Staff, at (410) 965-9102.

Sincerely,

A handwritten signature in blue ink that reads "Stephanie Hall".

Stephanie Hall  
Chief of Staff

SOCIAL SECURITY ADMINISTRATION BALTIMORE, MD 21235-0001

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## Text for Appendix I: Comments from the Social Security Administration

July 27, 2020

Mr. William Woods

Director, Contracting and National Security Acquisitions Team United States  
Government Accountability Office

441 G Street, NW Washington, DC 20548

Dear Director Woods,

Thank you for the opportunity to review the draft report, "SOCIAL SECURITY CONTRACTING: Relevant Guidance Should be Revised to Reflect the Role of Contracting Personnel in Software Development" (GAO-20-627). We appreciate your acknowledgment that our approach to awarding and overseeing contracts aligns with federal requirements. We agree with the recommendation.

If you have any questions, please contact me at (410) 965-9704. Your staff may contact Trae Sommer, Director of the Audit Liaison Staff, at (410) 965-9102.

Sincerely,

Stephanie Hall Chief of Staff

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## Appendix II: GAO Contact and Staff Acknowledgements

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### GAO Contact

William T. Woods at (202) 512-4841 or [woodsw@gao.gov](mailto:woodsw@gao.gov)

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### Staff Acknowledgements

In addition to the contact named above, the following staff made key contributions to this report: Angie Nichols-Friedman (assistant director), Gina Flacco (analyst in charge), Vinayak Balasubramanian, Virginia Chanley, Laura Greifner, Erin Godtland, Shelby Gullion, Julia Kennon, TyAnn Lee, Jennifer Leotta, Beth Reed Fritts, Sylvia Schatz, William Shear, Rachel Steiner Dillion, Erin Stockdale, Roxanna Sun, Kevin Walsh, and Candice Wright.



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