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TITLE: GUIDANCE FOR ORGANIZING ARCS CONTRACT FILES

APPROVAL DATE: 1/3/89

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FINAL

DRAFT

STATUS:

- [] A- Pending OMB approval
- [] B- Pending AA-OSWER approval
- [] C- For review &/or comment
- [] D- In development or circulating
headquarters

REFERENCE (other documents):

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United States Environmental Protection Agency
Washington, DC 20460

OSWER Directive Initiation Request

1. Directive Number
9242.6-02

2. Originator Information

Name of Contact Person

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OS240

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3. Title

GUIDANCE FOR ORGANIZING ARCS CONTRACT FILES

4. Summary of Directive (include brief statement of purpose)

Provides instructions to the Regions for development of a consistent, yet flexible filing system for organizing and managing ARCS Contract Files

5. Keywords Superfund, CERCLA, SARA

6a. Does This Directive Supersede Previous Directive(s)?

No

Yes

What directive (number, title)

b. Does It Supplement Previous Directive(s)?

No

Yes

What directive (number, title)

7. Draft Level

A - Signed by AA/DAA

B - Signed by Office Director

C - For Review & Comment

D - In Development

8. Document to be distributed to States by Headquarters?

Yes

No

This Request Meets OSWER Directives System Format Standards.

9. Signature of Lead Office Directives Coordinator

Betti C. VanEpps

Date

1/3/89

10. Name and Title of Approving Official

Henry L. Longest II, Director OERR

Date

1/3/89

EPA Form 1315-17 (Rev. 5-87) Previous editions are obsolete.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JAN 3 1989

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

OSWER DIRECTIVE 9242.6-02

MEMORANDUM

SUBJECT: Guidance for Organizing ARCS Contract Files

FROM: Henry L. Longest II, Director *[Signature]*
Office of Emergency and Remedial Response

TO: Director, Waste Management Division
Regions I, IV, V, VII, VIII
Director, Emergency and Remedial Response Division
Region II
Director, Hazardous Waste Management Division
Regions III, VI
Director, Toxic and Waste Management Division
Region IX
Director, Hazardous Waste Division, Region X

Purpose:

To transmit to you the attached Guidance for Organizing ARCS Contract Files.

Background:

The attached guidance was previously transmitted to you for comment via a memo from Clem Rastatter and Russ Wyer dated November 3, 1988, and was more recently incorporated into the CORAS Bulletin which was released in December.

Objective:

To attain a degree of consistency in the filing of ARCS contract documents.

Implementation:

It is recognized that there tends to be some variation among Regions in their approach to a file management system. The recommended system seeks to retain the flexibility needed to meet the varying needs of Regional Project Officers (RPOs). There is also the need for some standardization given the number of reviews which will continue to be conducted (EPA IG, GAO, etc.) as well as periodic visits by Headquarters representatives.

I expect the principles of the attached system to be followed in order to assure a minimal level of consistency among Regions in this area.

Any questions concerning the above or the attached guidance may be addressed to Ken Adams or Debbie Dietrich, Acting Director, Contract Operations, Review and Assessment Staff (CORAS) at 475-9337.

Attachment

GUIDANCE FOR ORGANIZING ARCS CONTRACTS FILES

This guidance recommends a standardized ARCS contracts file management system for Regional Project Officers (RPOs). A standard and consistent file organization in every Region is necessary because of the quantity and complexity of the documents that will be generated by the ARCS contracts. A standard system should serve several important functions:

- Simplify access and retrieval. Access and retrieval will be simplified. The first document in each file will be an index listing the file contents. Other documents in the file will be categorized and arranged in separate file sections or subsections, by category. For example, in the work assignment management file, the first section may include all work assignments for a given site arranged in chronological order.
- Provide continuity. As a kind of "institutional memory," a standard organization will ensure that all necessary documents related to costs, site activity, contract management, and contractor performance are retained and retrievable. Thus, even if personnel turnover occurs, key information will continue to be available as long as required.
- Facilitate review. A standard organization will facilitate contract management oversight and site review activities of Congress, the General Accounting Office (GAO), the EPA Inspector General, and other Agency groups.

The recommended organization serves these functions while retaining the flexibility necessary to meet the varying needs of Projects Officers (POs).

Exhibit 1 lists the majority of the documents that will have to be maintained in ARCS contract files and briefly describes their functions. The list of documents in Exhibit 1 is not exhaustive. Some of the documents included in the file illustrations below are not discussed. These are routine contract documents that are not ARCS-specific, such as procurement requests and equipment lists. Also, substantive programmatic documents such as preliminary assessment or RI/FS reports, for example, are not included. These documents form part of the administrative record supporting site decision-making and will be retained in the administrative record file. There may be additional documents that are part of the decision-making process, but are also pertinent to work assignment management, e.g., certain technical directives. Such documents should be retained in both the administrative record and the ARCS work assignment management file.

ARCS documents should be organized in five files:

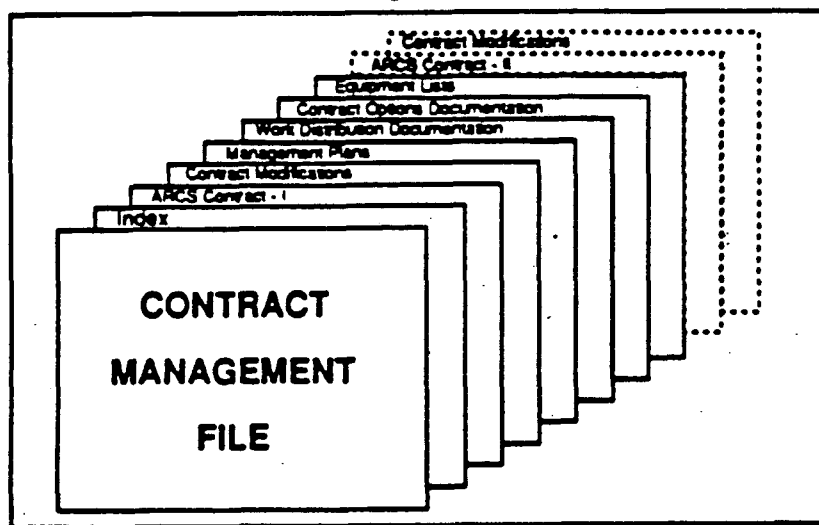
- A. A general contract management file, organized by

- contract;
- B. A work assignment management file, which may be site-specific;
 - C. A financial and progress report file;
 - D. A performance evaluation file; and
 - E. A confidential file.

Each file may occupy a file drawer, a portion of a drawer, or several drawers. The files, however, must be divided into the recommended sections. Each file section should be clearly identified and labeled. An index listing the sections should be the first document in each file. All documents in a single category should be filed together in a separate section or subsection, e.g., all work assignments or work assignment completion reports. Within each section, where practicable, documents should be arranged in chronological order with the most recent documents filed at the front of the section. The length of the retention period for each category of documents will be determined by the PO and Contracting Officer, pursuant to the Federal Acquisition Regulation (see 48 CFR 4.8, October 1, 1987 ed.).

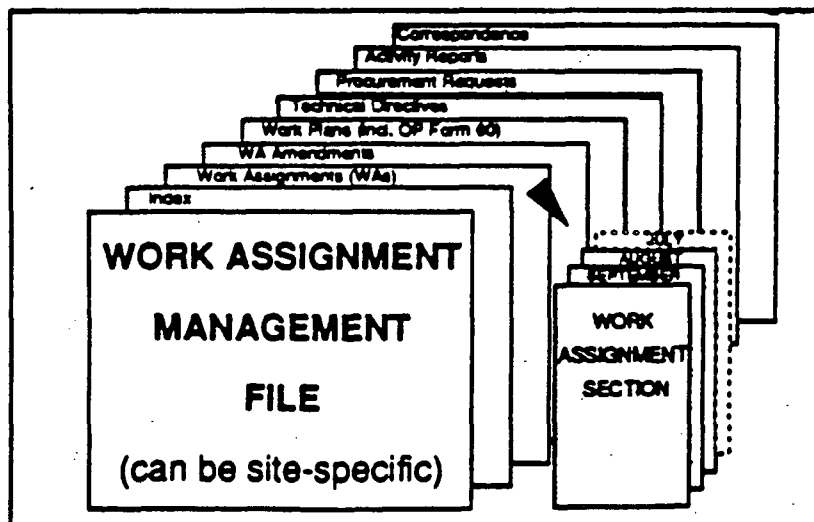
The following file illustrations show the documents that should be included in each file and the recommended sequence of document sections.

A. Contract Management File



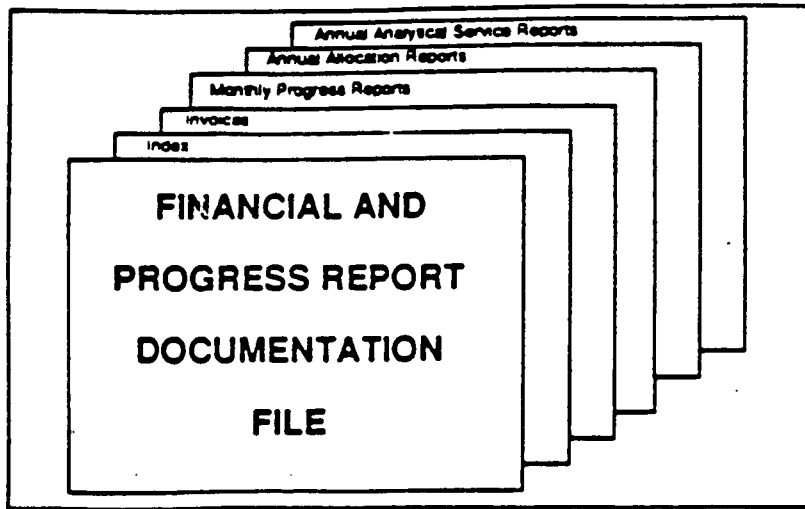
For each ARCS contract, the contract management file will contain documents directly related to the ARCS contract, such as the contract itself, contract modifications, management plans, documentation relating to work distribution and the exercise of contract options, and routine contract documents that are not ARCS-specific, such as equipment lists.

B. Work Assignment Management File



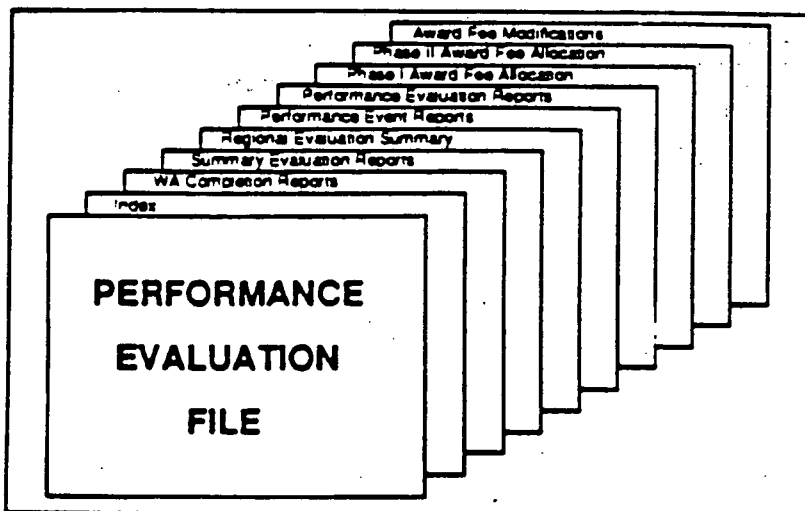
The work assignment management file may be site-specific. It will contain all work assignments and work assignment amendments, workplans, activity reports, and all correspondence (including cover letters from deliverables) related to a given site. Routine contract documents, such as procurement requests, will also be included in the work assignment management file.

C. Financial and Progress Report File



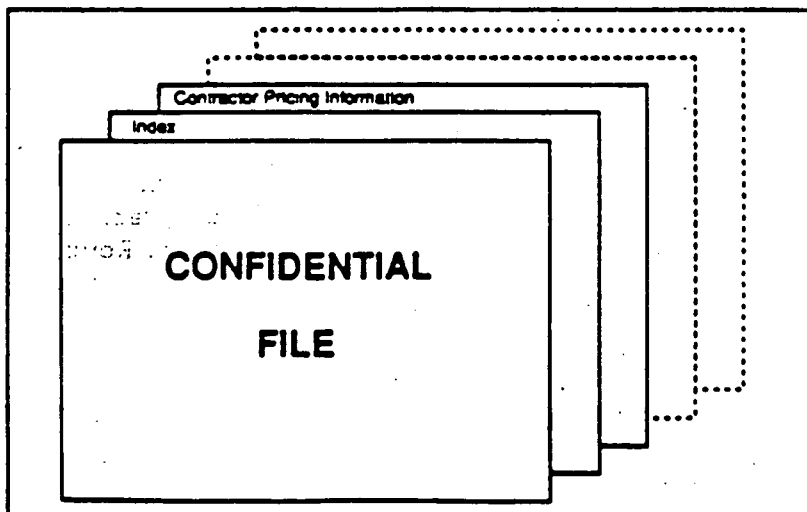
The financial and progress report documentation file will contain monthly progress reports and other cost-related documents such as invoices, annual allocation reports, and annual analytical service reports.

D. Performance Evaluation File



The performance evaluation file will contain all contractor and EPA prepared documents regarding contractor performance under each ARCS contract.

E. Confidential File



The confidential file is a limited access file that will contain any document that must be kept confidential, for example, contractor pricing information. Confidential documents should be organized by ARCS contract.

Regional contract management personnel who identify additional ARCS or routine contract documents that have not been included in this recommended plan, or have questions or suggestions regarding file management, should notify Ken Adams of the Contract Operations Review and Assessment Staff, FTS #8-475-9337, EPA mail code OS-240, EPA electronic mailbox EPA 5240.

EXHIBIT 1

DOCUMENTS THAT PRESENTLY NEED TO BE RETAINED IN ARCS CONTRACT FILES

Document	Function
<u>Contract Management Documents</u>	
Contract and Contract Modifications	Agreement between EPA and contractor stating terms according to which work will be performed.
Management Plan	Plan for managing the contract including the purpose and scope of the project, the management process, subcontracting, property management, the technical approach, quality assurance plans, and health and safety plan.
Work Distribution Documentation	[Specific documents required in this category have not been determined.]
Documentation of Exercise of Contract Options	[Specific documents required in this category have not been determined.]
<u>Work Assignment Management Documents</u>	
Work Assignment	Vehicle used by EPA to assign work to contractor; includes work description, allotted LOE, duration of assignment, and scheduled completion date.
Work Assignment Amendment	Modification to add to or change work assigned, hours, duration, etc.
Work Plan (incl. OP Form 60)	Required for each work assignment; serves as a baseline to monitor contractor's progress; must include a detailed cost estimate identifying all major cost items, stating objectives of proposed activity, and describing relationship to other activities, technical approach, and work to be performed under each task; must also include safety measures, schedule, number of person-hours required, cost flow and control procedures, subcontracting, and document production and distribution.
Activity Report	Documents the completion of work assignments, conduct of work; presents findings, conclusions, and recommendations; accounts for funds expended; provides guidance for future activity.
<u>Financial and Progress Report Documents</u>	
Invoice	Written request for payment under the contract for supplies delivered or for services rendered.
Monthly Progress Report	Informs Project Officer (PO), Regional Managers, and the Remedial Project Managers (RPMs) of the status of individual activities and the overall program for the reporting period; provides baseline for planned expenditures for each site and work assignment; calls attention to departures from management and work plans. Consists of two parts: Summary Progress Report -- pertinent technical and financial information describing contractor efforts on all work assignments; summarizes expenditures, estimates LOE and costs required for completion; includes spread sheet comparing actual and budgeted expenditures. Site-Specific Report -- supplies technical and financial summaries for each work assignment on a site-specific basis.

EXHIBIT 1 (CONTINUED)

DOCUMENTS THAT PRESENTLY NEED TO BE RETAINED IN ARCS CONTRACT FILES

Document	Function
Annual Allocation Report	Allocates program management costs, fixed and award fees, and some non-site activity costs to sites and activities for which costs were incurred during the previous Federal fiscal year.
Analytical Services Report	Annual report on use of non-CLP laboratories and analysis of the effectiveness of the services provided.
Performance Evaluation Documents	
Work Assignment Completion Report (WACH)	Concise review of contractor's performance of specific work assignment used to identify difficulties or trends and provide contractor feedback about work areas that need improvement.
Contractor Self-Evaluation Report	Contractor's self-evaluation of performance for the relevant period for consideration by the Performance Evaluation Board (PEB).
Summary Evaluation Report (SER)	Project Officer's overall evaluation based on contractual criteria and rating guidelines; considers two categories -- project management office activities and technical performance of remedial work assignments; identifies recurring difficulties and trends; indicates work assignments upon which evaluation is based. (Contracting Officers also prepare SERs; PEBs may prepare SERs for both categories for consolidation with the PO's evaluation.)
Regional Evaluation Summary (RES)	Summary of performance of contractor and subcontractors on each active work assignment for use of Performance Evaluation Board (PEB) in determining the award fee; rates performance and progress of specific projects, and documents average or above average performance; incorporates information on specific problems from the Performance Event Report, signed by the RPM and PO.
Performance Event Report (PER)	Documents less than satisfactory performance of an area of work or work assignment; vehicle for affecting the contractor's award fee and for PEB's use in determining the final amount of the Phase II award.
Phase I Award Fee Allocation Matrix	Table summarizing costs and Phase I award fees by work assignment prepared for trimester evaluation by the contractor and verified by the Contracting Officer (CO) for the PEB's use in determining the Phase I (contract-wide) award fee.
Phase II Award Fee Allocation Matrix	Prepared at the conclusion of work assignments; summarizes the evaluation made by the Region, the contractor, and the PEB.
Performance Evaluation Report	Report and recommendation of the PEB after determination of award fees.
Award Fee Modifications	Letter signed by fee determination official informing contractor of amount and basis of award fee.