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Commentary on the Acquisition Workforce

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FEATURE COMMENT: Empty Promise For The Acquisition Workforce

In his confirmation hearings, David Safavian, the Office of Federal Procurement Policy (OFPP) administrator, testified, "The strategic management of the human capital that makes up our acquisition workforce will be my number one priority." 2004 WL 946219 (April 29, 2004). True to his word, he promptly promulgated a new OFPP Policy Letter 05-01, *Developing and Managing the Acquisition Workforce* (April 15, 2005), available at http://www.whitehouse.gov/omb/procurement/policy_letter_05-01.html. These two FEATURE COMMENTS discuss the policy letter and what it signals to the acquisition community. The second FEATURE COMMENT, authored by my colleague Chris Yukins, offers some reactions to the letter from a pedagogical standpoint.

This FEATURE COMMENT concludes that, although the letter's title optimistically heralded a bold step forward, OFPP both aimed too low and missed the mark. The letter attempted to redefine cosmetically the acquisition workforce and describe how a portion of this deputized acquisition workforce should be trained. While the latter is important, the letter dodged the primary issue that daunts the workforce, potentially painted a deceptive picture of a growing acquisition workforce and failed to communicate either a vision for, or leadership of, a reinvigorated corps of contracting professionals. In doing so, OFPP squandered an important opportunity to effect meaningful change.

Other than That, Mrs. Lincoln, How Was the Play?—First, the policy letter ignores the proverbial elephant in the room: the Govern-

ment lacks the number of strong, talented and well-trained procurement horses needed to pull the wagon. Last year, Safavian told the Senate, "With 40 [percent] of our procurement professionals eligible to retire in the next five years, the acquisition corps faces a potential human capital crisis. Unfortunately, because these positions are scattered around the agencies, the scope and dangers of this situation are easily overlooked. ... Recruiting and retention must be addressed." 2004 WL 946219 (April 29, 2004). Yet even that stark language undersold the extent of the problem. Safavian failed to acknowledge that (1) the acquisition workforce was insufficient before Sept. 11, 2001, and (2) although Government procurement spending has increased dramatically since then, neither OFPP nor Congress has expressed any interest in commencing a meaningful dialogue on this problem. Thus, despite a clear need for additional resources, Safavian, like many of his predecessors at OFPP, steadfastly refuses to call for increasing the size of the acquisition workforce.

Let's Talk Numbers—This isn't a new problem, and there's no shortage of evidence alluding to the inadequate staffing of the Government's acquisition function. Facing pressure to downsize during the 1990s, Congress pressured agencies to slash procurement professionals, at best deeming 1102s (the Office of Personnel Management's "contracting series") "non-core," or, at worst, disparaging them as unnecessary or superfluous "shoppers." Without waiting to see if streamlining and increased purchaser discretion would make the existing workforce more efficient, reformers traded acquisition personnel for increased purchasing flexibility.

It's easy to criticize this policy, particularly because little or no empirical evidence supported the reductions. Granted, such a study, in order to be meaningful, would be difficult to conceive and expensive to conduct. Nonetheless, such an effort is long overdue.

Also, the decade-long (1989-2000) workforce reduction trend coincided with aggressive acquisition reform. But no effort was made to correlate the discre-

tion granted with the skill sets of the existing workforce. This led to any number of difficulties in implementing various reforms. Moreover, the continued reductions proved devastating to procurement personnel morale, particularly as procurement professionals faced shrinking opportunities for advancement or increased compensation. At the same time, minimal progress was made to reform the civil service personnel system. This, in turn, limited managers' abilities to (1) promote, develop, train and retain the most talented procurement professionals and (2) effectively incentivize good, and disincentivize bad, behavior. And, although, as Safavian testified, a significant percentage of the acquisition workforce is eligible (or approaching eligibility) to retire, mandated workforce reductions barred agencies from hiring new (and potentially younger, better educated, more flexible and higher-energy) personnel. More than fifteen years passed without a proportionate infusion of "new blood" into the procurement workforce. And because the demands upon the purchasing community did not decrease—instead these demands have increased dramatically since 2001—we more frequently witness a triage-type focus on buying which severely limits the resources available for contract administration. That recipe for disaster hides significant downstream costs.

The relentless competitive sourcing initiative exacerbates the crisis. "[T]he increasing significance of contracting for services has prompted ... a renewed emphasis ... to resolve long-standing problems with service contracts. To do so, the government must face the twin challenges of improving its acquisition of services while simultaneously addressing human capital issues. One cannot be done without the other." GAO-01-753T, *Contract Management: Trends and Challenges in Acquiring Services* (May 22, 2001), available at <http://www.gao.gov/new.items/d01753t.pdf>. Expertise in sealed bidding or supply purchasing isn't enough. Competitive sourcing (or, often, replacing Government employees with contractors) requires skilled professionals to plan, compete, award and manage sophisticated long-term service contracts. GAO-03-943T, *Competitive Sourcing: Implementation Will Be Key to Success of New Circular A-76* (June 23, 2003), available at <http://www.gao.gov/new.items/d03943t.pdf> and OFPP Policy Letter 93-1, *Management Oversight of Service Contracting* (May 18, 1994), available at <http://www.acqnet.gov/Library/OFPP/>

PolicyLetters/Letters/PL93-1.html ("Contracting for services is especially complex and demands close collaboration between procurement personnel and the users of the service.").

Various reports and anecdotes reflect the disconcerting reality. For example, GAO lists human capital—management of its smaller and graying workforce—as a significant high-risk issue. 43 GC ¶ 177 ("[T]he demographics of the current workforce present not only a crisis, but also a tremendous opportunity for fundamentally reshaping the acquisition workforce."); *Agencies Must Act Now to Avoid "Human Capital" Crisis*, *Comp. Gen. Testifies*, 43 GC ¶ 58 (serious human capital shortfalls are eroding the Government's efficiency and effectiveness); *GAO Adds Workforce Issues to "High-Risk" List, Procurement And Financial Management Issues Remain Concerns*, 43 GC ¶ 34 (the Government's strategies for managing its workforce are not up to the task of meeting current and emerging public needs); GAO-03-157, *HUD Management—Action Needed to Improve Acquisition Management* (Nov. 2002), available at <http://www.gao.gov/new.items/d03157.pdf>, 44 GC ¶ 470 (like many others, HUD dramatically downsized its staff—including its procurement staff—during the 1990s, despite the fact that its workload did not decrease); NASA Inspector General report IG-03-003, *NASA Contracts for Professional, Administrative, and Management Support Services* (Oct. 16, 2002), available at <http://www.hq.nasa.gov/office/oig/hq/ig-03-003.pdf>, 44 GC ¶ 446; IG-01-041, *Procurement Workforce Planning* (Sept. 27, 2001) (concluding that NASA lacks enough adequately trained acquisition professionals to handle its future procurement workload demands); and DOD IG report D-2000-088, *DOD Acquisition Workforce Reduction Trends and Impacts*, (Feb. 29, 2000), available at <http://dodig.osd.mil/audit/reports/00-088.pdf> ("Using the congressional definition, ... DoD reduced its acquisition workforce from 460,516 to 230,556 personnel, about 50 percent, from ... [Fiscal Year] 1990 to ... 1999; however, the workload has not been reduced proportionately. ..." Moreover, "concern is warranted because staffing reductions have clearly outpaced productivity increases and the acquisition workforce's capacity to handle its still formidable workload."), 42 GC ¶ 131.

To the extent this pending crisis remains largely ignored, allegations regarding contractor

personnel participating in the alleged prisoner abuse at Abu Ghraib suggested that (1) the workforce crisis increasingly drove agencies toward potentially problematic interagency contracting vehicles and (2) the Government must devote more resources to contract management and oversight. See, e.g., GAO-05-201, *Interagency Contracting: Problems with DoD's and Interior's Orders to Support Military Operations* (April 2005); and Steven L. Schooner, *Contractor Atrocities at Abu Ghraib: Compromised Accountability in a Streamlined, Outsourced Government*, 16 STAN. L. & POL'Y REV. 549 (2005), available at <http://ssrn.com/abstract=605367>. Nonetheless, OFPP refrains from requesting additional acquisition personnel.

Rearranging the Titanic's Deck Chairs—

What then does the policy letter's grand gesture accomplish, particularly in redefining the acquisition workforce? Frankly, less than it seems. The letter applies, at most, to one-third of the acquisition workforce. It also makes primarily cosmetic changes. Arguably, the letter's crowning achievement is directing civilian agencies to follow DOD's lead and adopt DOD's procurement training curriculum.

Casual readers might not have noticed that the letter is addressed only to civilian agencies and explicitly excluded acquisition personnel in defense agencies—personnel covered by the Defense Acquisition Workforce Improvement Act (DAWIA), 10 USCA §§ 1741-46. That's shocking because in FY 2003, DOD's \$208.6 billion of procurement accounted for more than 68 percent of \$305.4 billion of the federal total (up slightly from 64.9 to 66.6 percent during FYs 2000–2002). Federal Procurement Data System, *Total Federal View*, available at <http://www.fpsc.gov/fpsc/FPR2003a.pdf>. Thus, the policy letter currently applies to less than one-third of the acquisition workforce.

To the extent that no one references the addressee of a Policy Letter and the letter is not entitled “Developing and Managing the *Civilian* Acquisition Workforce,” it sends a confusing message. Recall that the Clinger-Cohen Act, P.L. No. 104-106 (Feb. 10, 1996), sought to impose mirror image DAWIA requirements on the civilian agencies. Does the letter suggest that OFPP cannot impose requirements upon DOD? Does OFPP believe that DOD needs no additional guidance with regard to its workforce? Or was the letter intended to chide ci-

vilian agencies into catching up with defense agencies? “This Letter builds on [among other things, Policy Letter 97-01] to improve the development of the acquisition workforce by more broadly defining the acquisition workforce and more closely aligning civilian (non-DOD) and defense acquisition workforce requirements.” OFPP appears to formalize, and set a timetable for, the long-anticipated merger of civilian- and defense-agency training under the auspices of the Defense Acquisition University (DAU). This seems like an appropriate step, particularly for those who favor uniformity in federal procurement. It also tracks Safavian's confirmation testimony and the mid-March announcement by DAU, the Federal Acquisition Institute (FAI) and OFPP that FAI would move from the General Services Administration to the DAU campus.

The letter also directs DAU and FAI to jointly develop an 1102 certification program. 70 Fed. Reg. 20181 (April 18, 2005). Civilian agencies, if possible, should adopt the DAU curriculum by Oct. 1, 2005. Yet it is curious that OFPP did not direct DAU and FAI to reach out to the private sector in developing a certification program. (Contrast this with the program management certification mandate that OFPP suggests should be guided, in part, by “accepted industry certification programs.”) The National Contract Management Association has certified contract managers (CPCMs or certified professional contracts managers) for many decades and, somewhat recently, federal contracts managers (or CFCMs). See, e.g., <http://www.ncmahq.org/certification>. Similarly, the Universal Public Purchasing Certification Council, jointly established by the National Institute of Governmental Purchasing Inc. and the National Association of State Procurement Officials, certifies public procurement officials at two levels: the Certified Public Purchasing Officer (CPPPO) and the Certified Professional Public Buyer (CPPB). Granted, both certification regimes are imperfect, and the transition from essay to multiple-choice exam format does not inspire confidence, but these organizations' experiences at least merit investigation.

Cosmetic Growth?—As discussed at greater length in the following FEATURE COMMENT, the letter broadly redefines the acquisition workforce, which OFPP's training and management mandate would cover. Of course, the acquisition workforce will include contracting and purchasing personnel, and many program and project managers. But the let-

ter also permits agencies to count others involved in acquisition planning, contracting and property management, as well as support and management functions.

There's no more intriguing example (to a lawyer) than the inclusion of the general counsel. Experience supports, and I applaud, any institutional effort to include counsel on the acquisition team, from the definition of the requirement through the procurement process, and throughout contract administration and close-out. And permitting Government contracts attorneys to have access to DAU's acquisition training courses will no doubt make counsel more knowledgeable and effective. But including attorneys (and others) in the acquisition headcount artificially inflates the size of the workforce. In other words, without any additional resources, the broad definition permits OFPP to report dramatic growth in the acquisition workforce. This type of cosmetic obfuscation not only masks the extent of the problem, but it empowers those opposed to responsible investment in acquisition personnel, and, ultimately, delays efforts to remedy the problem.

Lessons from the Private Sector?—Still, the greatest disappointment is an apparent absence of vision at OFPP. The battle cry of the 1990s procurement reform movement was businesslike Government. As part of the larger effort to reinvent Government, reformers sought to borrow successes from the private sector and apply them in the public context. One thing we've learned is that not all private-sector lessons translate well to the public sphere. Nonetheless, it's strange that, despite a dramatic sea change in the private sector's approach to procurement (under the more vogue rubric of "strategic sourcing"), the Government appears deaf to the drumbeat demanding increased emphasis on identifying and grooming talent to select, manage and integrate contractors into organizations' core missions.

Successful corporations no longer disparage their procurement resources as "shoppers." Business schools now preach that the reason contracting or outsourcing "efforts often fail to measure up to expectations, even purely in terms of cost savings, is that most companies ... make sourcing decisions on a piecemeal basis... . To realize the full potential of sourcing, companies must forget the old peripheral and tactical view and make it a core

strategic function." Mark Gottfredson, Rudy Puryear & Stephen Phillips, *Strategic Sourcing: From Periphery to the Core*, 83 HARV. BUS. REV. 132, 133 (No. 2, Feb. 2005). Using domestic automakers as an example, the authors make the potent point that we need to rethink the procurement function.

Before it could reach this goal [of achieving the lowest total system costs], ... *Chrysler had to refocus its entire procurement function* so that it could manage the new, highly collaborative sourcing relationships. *That required the company to train and promote a different kind of manager who was capable of understanding system economics, not just one who knew how to nickel-and-dime the supplier base.*

Id. at 134 (emphasis added). It's hard to believe that DAU's desktop PowerPoint presentations will empower the existing acquisition workforce to rise to such a level.

Carrots and Celebrations?—Finally, effective leadership requires creativity. OFPP can incentivize the acquisition corps through less ambitious, but potentially highly symbolic and significant, efforts. Just as Al Gore's National Performance Review converted an inexpensive framed hammer into a coveted, nationally recognizable award, OFPP can do more to celebrate excellence and lead. In addition to agency-specific (and less lucrative) incentive programs, at least four large (\$5,000 each) Government-wide procurement prizes (three funded by the private sector) now reward individual excellence. The *Ida Ustad Award* recognizes 1102s with high ethical standards, the *Procurement Round Table Elmer Staats Award* recognizes younger procurement professionals, the *ESI Contracting Award* recognizes contributions to acquisition operations or policy and the *Procurement Round Table John Magnotti Acquisition Mentorship Award* recognizes acquisition workforce mentorship. If this trend injects excitement into the best procurement professionals, OFPP should be able to organize and parlay these, and similar, programs into a productive sharing of lessons learned.

Conclusion—The Policy Letter fails to tackle the most daunting issues facing the acquisition workforce, the pent up demand for talent. Maybe David Safavian's efforts have just begun. The high-profile § 1423 Panel established a working group on the federal workforce. Hopefully, the panel's efforts will encourage OFPP to demand the long-

awaited and badly needed infusion of new, energetic and highly qualified talent to wisely and effectively spend the Government's money and guide the Government's investments from bargains to value for money.



This FEATURE COMMENT was written for THE GOVERNMENT CONTRACTOR by Professor Steven L. Schooner, Co-Director of the Government Procurement Law Program at the George Washington University Law School, and a member of THE GOVERNMENT CONTRACTOR Advisory Board.

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FEATURE COMMENT: A Pedagogical Perspective On Training The Acquisition Workforce

Steve Schooner's comments, above, focus, quite appropriately, on the *policy* aspects of revamping the acquisition workforce. I share his concerns, but want to add a few thoughts on the *pedagogical* aspects of the Office of Federal Procurement Policy's initiative. As law professors, after all, we teach acquisition personnel—in our case, though, we focus on teaching Government contracts lawyers.

Notably, as mentioned above, the OFPP letter sweeps up attorneys in its broadened definition of the acquisition workforce. Consistent with the Services Acquisition Reform Act, part of P.L. No. 108-136, agencies' acquisition workforces now include, at a minimum, contracting and purchasing personnel and certain program and project managers. Moreover, on an ad hoc basis, agencies may include others who are involved in acquisition planning, contracting and property management, and those who support or manage the acquisition functions (such as lawyers and finance personnel). OFPP's requirements for training and management of the acquisition workforce now cover all of these broader categories of acquisition personnel.

The OFPP letter stresses that, through common training and certification, the acquisition workforce is to be "based on a framework of core competencies that are common to defense and civilian agencies." That's commendable, for it ensures that acquisition professionals will be able to move fluidly between agencies, as demand for their

services rises and falls over the decades of an acquisition professional's career. Experience shows that, with that mobility, acquisition personnel are able to carry best practices between agencies in a unified acquisition system.

The OFPP letter also emphasizes the need for continuous learning. The letter sharply increases the total hours of training required for acquisition personnel, and specifically cites the need for ongoing training in critical topics such as ethics and performance-based contracting. More broadly, the letter assigns roles to various players, including the agencies' Chief Acquisition Officers and the Federal Acquisition Institute, to ensure that acquisition personnel have ready access to continuing education.

Resolving Who Is Being Trained—OFPP's letter leaves unresolved a number of other issues, however, which should be resolved *before* training is overhauled. Perhaps the most obvious omission is a goal: OFPP never articulates the role we expect acquisition professionals to play as they emerge from the revamped training program. That omission is critical because the roles of federal acquisition professionals are rapidly devolving in different directions.

Traditionally, acquisition professionals were contracting personnel—typically classified by OPM as 1102s—who worked closely with the program personnel in their respective agencies. Contracting personnel stood at arm's length in a matrixed organization, in part to ensure integrity and accountability in the contracting process. Ultimately, an agency's contracting and program personnel shared a common goal to further their individual agency's mission.

That traditional relationship eroded as more centralized purchasing options emerged. Today, self-funded, entrepreneurial independent agencies such as the General Services Administration's Federal Supply Service (and their competitors, specialized purchasing units such as the Interior Department's National Business Center) compete vigorously to "sell" their contracting expertise to other agencies, for a fee.

That competition for contracting work drives contracting personnel at the "entrepreneurial" agencies to accommodate program personnel at the "buyer" agencies. See generally Steven L. Schooner, "Risky Business: Managing Interagency Acquisition," 47 GC ¶ 156; and "GSA Announces Program to Help

Contracting Personnel ‘Get It Right,’” 46 GC ¶ 277. Because program personnel too often remain indifferent to competition and transparency—many program personnel simply want to purchase a known solution quickly and painlessly—the “entrepreneurial” acquisition personnel have strong incentives to accommodate their “customers” (the agency program personnel) by taking shortcuts in procurement. See “New GSA Audit Cites ‘Significant Deficiencies’ in CSCs’ Contract Compliance,” 47 GC ¶ 2; and GSA, Office of Inspector General, *Audit of Federal Technology Service’s Client Support Centers* (Rep. No. A020144/T/5/Z04002, Jan. 8, 2004), available at www.gsa.gov/gsa/cm_attachments/GSA_DOCUMENT/A020144_R2QA4-j_0Z5RDZ-i34K-pR.pdf. Partly as a result of this skewed incentive system, over the past few years the federal procurement system has become progressively less open and competitive.

With these changes, arguably two distinct models for contracting personnel have emerged. The first is a traditional contracting official, embedded in an agency in a tight matrix relationship with the program personnel she serves; the second is a contracting official for a centralized purchasing agency who is only remotely connected to his “customers,” the program personnel who order goods and services.

The training for these two types of acquisition personnel should, in principle, differ. The traditional contracting professional, after being grounded in the basics of procurement law, should learn and embrace the nuances of her agency’s mission and operations. A traditional contracting official adds value by integrating good contracting techniques with her agency’s working goals and operations.

In contrast, a centralized purchasing official—a GSA Contracting Officer, for example—occupies a very different role. This professional serves much more as an intermediary between the customer agency and industry. The CO must, therefore, maintain a healthy distance from his customers, the program personnel, and he must be vigilant against pressures to forfeit competition and transparency for expediency. He must, in other words, be both highly trained and a critical thinker. In contrast to the traditional contracting official, the centralized contracting official will gain little from immersed training in any agency’s operations—he

serves many agencies, after all. He will, however (again in contrast to his traditional counterpart), gain enormously from information on his subject industry, so that he can negotiate more effectively in that industry for his client agencies. Cf. “Better Pricing for MAS Contracts Is Possible, GAO Says,” 47 GC ¶ 138. In sum, the training that this centralized acquisition official should receive differs enormously from that needed by the traditional, “embedded” contracting official—and yet nothing in OFPP’s recent directive suggests that training will differ across different roles in the contracting community.

Assessing How Acquisition Personnel Are Trained—Since OFPP has effectively delegated civilian agency acquisition training to the Defense Acquisition University, it seems fair to ask whether DAU needs to shift its operations to accommodate this new task. As DAU becomes, in essence, the sole gateway to training for all federal acquisition personnel, DAU will need to meet several challenges to ensure that the acquisition workforce is nimble, accountable and sufficiently well-trained to negotiate effectively with a highly sophisticated private sector.

One challenge lies in *how* DAU trains. The DAU curriculum heavily depends upon online training, which seldom proves itself the optimal vehicle for teaching critical thinking. As one empirical study noted, “[I]t is the quality of human interaction that determines online learning success.” Ian J. Quitadomo & Abbie Brown, “Effective Teaching Styles and Instructional Design for Online Learning Environments” (June 2001), available at www.eric.ed.gov (Paper No. ED462942). Unfortunately, much of DAU’s online curriculum appears to offer *no* ongoing interaction between students and faculty. Such a program may yield procurement professionals who, despite having reviewed hundreds of PowerPoint slides online, nonetheless lack the ability to apply that knowledge critically to their work. One way to resolve this problem may be to look to private institutions, which already serve as “strategic partners” to DAU, to help fill this void in critical training. See, e.g., <http://www.dau.mil/about-dau/partnerships.aspx>.

The same critical approach must be embraced by students if they hope to compete (and negotiate) with their highly trained counterparts in the private sector. See, e.g., *Acquisition Workforce: Sta-*

tus of Agency Efforts to Address Future Needs, GAO-03-55, (Dec. 2002). The good news is that the procurement field lends itself particularly well to training in critical thinking. Exercises in procurement ethics, for example—a vitally important topic at this point, as OFPP’s own letter notes—are, if they’re successful, almost always exercises in critical thinking. Cf. *Defense Ethics Program: Opportunities Exist to Strengthen Safeguards for Procurement Integrity*, GAO-05-341 (April 2005) (noting need for bolstered ethics training, in Government and industry). On the international front, a vast literature in comparative procurement is pouring into the U.S., and there is almost no better way to examine our own procurement system critically than to compare it to other nations’. On these and many other fronts, therefore, it would be relatively simple, and vitally important, to introduce more training in critical thinking to the acquisition training curriculum.

Fostering Risk-Taking and Exploration at DAU—In accommodating the civilian agencies’ acquisition workforce, DAU may need to shift its tone and approach. In its current form, DAU is a military organization with a strong, top-down management style and a focus on serving the warfighter. DAU’s 2005 catalogue, for example, indicates that its mission is to “provide practitioner training, career management, and services to enable the [acquisition, technology and logistics] community to make smart business decisions and deliver timely and affordable capabilities to the warfighter.” How well that translates for civilian agencies remains to be seen.

DAU’s top-down management structure and its approach—emphasizing curriculum and structure—appear out of step with the sometimes cranky academic freedom that marks most universities. For example, DAU’s top-down approach tends to obscure its individual DAU faculty members, who are not listed in the course guides. On private university campuses, in contrast, centuries of experience have shown that the strength of the learning experience derives from a motivated, autonomous and accountable faculty; a strong curriculum is not enough. Harvard College, which for decades has struggled to enhance its undergraduate education by reshaping its curriculum, provides a telling lesson here. In Harvard College’s case, the problem (and thus the solution) may derive not from the curriculum,

but rather from an indifferent and largely unaccountable faculty. Harvard’s difficulties suggest that even the best curriculum will not be enough. To succeed—and to keep federal acquisition training on the cutting edge—DAU must foster a vigorous, independent faculty of individuals willing to take risks, to explore new areas of procurement study, to engage fully with their students and to be held individually accountable for their students’ classroom success.

Training a Broader Universe of Acquisition Personnel—A final gap in the OFPP letter goes to the acquisition workforce *outside* the Government. Technically speaking, the Government bears no responsibility to train those in the private sector who contract with the Government. Practically speaking, however, the Government will be well-served to make its training accessible to the private sector.

A foreigner’s perspective may help explain why. When we introduce our system to foreign procurement experts, they are almost always surprised both by the *complexity* of the U.S. procurement system and by the *rapidity* with which it changes. No other system in the world bears the same enormous regulatory structure; nor can any other system absorb regulatory change so rapidly. We point out to our foreign visitors that the key to our system’s success is the tens of thousands of highly trained procurement personnel, who dedicate a large part of their professional lives to learning the U.S. procurement rules, and then another large part to tracking changes in those rules. Were it not for the aggressive training of those professionals, training which carries procurement innovation across thousands of acquisition professionals, the system would collapse under its own phenomenal weight.

That training, however, would be useless if it did not reach across the entire federal marketplace. As the acquisition system twists and bends with new ideas and approaches, both public- and *private*-sector acquisition professionals need to understand those changes; if only Government personnel understood acquisition reforms, those reforms would almost certainly fail.

As OFPP and DAU move forward, therefore, in strengthening acquisition training, they should recognize that many critical participants in federal acquisition stand outside the Government’s prim-

eters. DAU already opens courses at no cost to industry participants—see <http://www.dau.mil/registrar/CONTRACTORS.asp>—and federal acquisition training should, where possible, be built with an eye to accommodating students from both industry and Government. Where training can be structured to include private-sector students—or where specific curricula, such as ethics training, could be reused efficiently in the private sector—OFPP should encourage agencies to make that training easily available to the private sector.

Conclusion—In many ways, OFPP has merged the resources available to the acquisition workforce in both civilian and defense agencies. OFPP’s initiative shifts a great deal of responsibility to DAU, which will now bear a combined responsibility for teaching acquisition workers across the Federal Government and beyond. To succeed, DAU will be able to draw on pedagogical lessons from the private sector, some of which flow from centuries of Western academic traditions. But the critical lessons for DAU’s teachers—take risks, challenge your students and, above all, cherish their success—are as old as teaching, and as important as ever.



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