U.S. House of Representatives

Committee on Oversight and Government Reform

Subcommittee on Management, Organization, and Procurement

Statement for the Record on the hearing topic:

The State of Federal Contracting: Opportunities and Challenges for Strengthening Government Procurement and Acquisition Policies

Tuesday, June 16, 2009

Statement submitted by the Quality Construction Alliance, comprised of:

Mechanical Contractors Association of America (MCAA)

Sheet Metal and Air Conditioning Contractors' National Association (SMACNA)

The Association of Union Constructors (TAUC)

Finishing Contractors Association (FCA), and

International Council of Employers of Bricklayers and Allied Craftworkers (ICE-BAC)

Quality Construction Alliance

Quality Construction Alliance Sponsoring Organizations

According to an independent research body:

- ***Industry Predominance:*** These construction specialty groups represent more than 25% of the total building construction industry volume in this country.
- ***Market Share:*** Sponsoring specialties hold a market share of more than 60% of non-residential building construction.
- ***Industry Employment:*** Sponsoring trades employ more than 460,000 organized electricians, pipefitters, plumbers, painters and allied trades, steel erectors, masonry craft workers, sheet metal workers and other construction specialists. They include the leading specialty contracting firms in the nation.
- ***Investment in a Skilled Workforce:*** Contractors in the sponsoring organizations are leaders in training skilled workers in these highly technical fields. Over 127,000 apprentices are trained in classrooms and on-the-job every year as part of multi-year programs funded by sponsoring contractors in cooperation with their union partners. Over 250,000 skilled journeymen workers receive extended training in emerging technologies. Sponsoring contractors contribute over $204 million *each year* to provide this training - entirely with their own funds.

What is the Quality Construction Alliance?

The *Quality Construction Alliance* is a coalition of five premier construction specialty contracting associations formed to create awareness among national, state and local leaders, as well as the general public, of the value of quality construction. The *Alliance* targets local, state and national public policy to assure that taxpayers receive full value for their construction dollar. "Quality Construction" stands for high quality work - meeting or exceeding specifications - produced on-time, on budget using a well-trained, efficient, highly-skilled workforce, and at a competitive price. Sponsoring organizations and their members are dedicated to bringing construction buyers this kind of quality construction.

Who participates in the "Quality Construction Alliance"?

The Quality Construction Alliance is sponsored by the five leading construction specialty trade associations, which, together, represent industries comprised of more than 22,000 contractors doing mechanical, electrical, sheet metal, plumbing, air conditioning, steel erection, trowel trades, painting and allied trades work, using well-trained and highly skilled workers from the organized building trades.

Contractors supporting the Quality Construction Alliance make a significant investment every day to bring this nation the highest quality, most cost effective construction, while providing for a safe, carefully-trained, highly-skilled, well-paid workforce. It all adds up to true ***Quality Construction***.

For More Information Visit ***www.qualityconstructionalliance.org!***

The State of Federal Contracting:
Opportunities and Challenges for Strengthening
Government Procurement and Acquisition Policies

Statement submitted by the Quality Construction Alliance

Tuesday, June 16, 2009

The construction industry groups that comprise the membership of the five Quality Construction Alliance (QCA) employer trade associations – MCAA, SMACNA, TAUC, FCA, and ICE-BAC are very grateful to Chairwoman Watson and the members of the subcommittee for the invitation to participate in this hearing.

The comprehensive set of issues and recommendations that follow are drawn from the perspectives of a broad cross- section of the high-skill specialty construction industry employers in the five associations. QCA member firms perform a wide variety of construction services, from large power and industrial projects- both new construction and maintenance, through commercial and institutional buildings, residential and multi-family housing projects, and including building heating/ ventilating/air conditioning services, operations and maintenance, and energy savings performance contracting services, in both the private and public sectors nationwide.

Many QCA–member companies perform large volumes of direct Federal construction work, variously contracting either as prime contractors with the Federal agencies or as subcontractors to prime contractors. QCA member firms have a broad perspective on the Federal construction contracting process from the frames of reference of both prime contractor and subcontractor.

The comprehensive set of regulatory and legislative recommendations that follow issue from that dual perspective. These suggestions are intended to help begin answering the questions posed for this hearing – what challenges do the Federal acquisition and procurement workforce trends pose for Federal construction procurement programs generally, and what opportunities are there for the Committee to help shape reforms that will strengthen those programs.

These recommendations are meant to provide constructive topics for consideration in that context. Some recommendations answer immediate challenges with rather immediate legislative action recommended – repeal of the 3% withholding tax, for example. Others address longer-term procurement trends and issues, and suggest reforms that will improve the Federal market over time and eventually address agency workforce/administrative challenges by raising the level of competition and performance on projects overall. All, however, are offered in the spirit of engaging in good faith, in-depth analysis of systemic reforms in the sole interest of improving Federal construction procurement programs for the benefit of the Federal agency procurement and program missions, the construction industry overall, and ultimately taxpayers and the public generally.

Overall, the context of these recommendations is based on rapid changes and developments in the construction industry in general, including technological and business practice changes, and workforce challenges facing both public and private sector employers alike. The leading Defense and Civilian agency construction procurement agencies and the professionals who work in those programs are top performing professionals, QCA employers attest, and compare most favorably with their counterparts in the private sector. Too often they don't get the credit they deserve for their professionalism and service to the government and taxpayer. QCA members most assuredly respect their professionalism and service. Still, some systemic issues in Federal procedures continue to warrant review and analysis as related in the recommendations that follow.

It is beyond question that top-flight Federal construction programs, ranging from the U.S. Army Corps of Engineers, the Naval Facilities Engineering Command, the U. S. General Services Administration and the Department of Veterans Affairs among others, have consistently over the years been among the leaders in the industry developing many beneficial industry changes, ranging from Partnering concepts, project dispute avoidance programs, design excellence, and now through to Building Information Modeling (BIM), and Green and sustainable high performance building policies. Professional judgment and leadership is not a problem with agency procurement programs, rather it is restrictions and systemic barriers that linger from older formal legal and regulatory constraints that need to be reviewed, analyzed and removed, if warranted.

1. Contractor qualification/responsibility determination procedures.

The QCA submits that more comprehensive prospective contractor responsibility, legal compliance, and past performance reviews (for both prime contractors and subcontractors) in the contract award/selection process will pay dividends in avoiding problems in project performance and save in consequent workforce and administrative overhead that unavoidably follows from not screening out poor performers in the contract pre-award screening process.

1.1 Develop and use contractor legal compliance database –

The QCA supports timely regulatory implementation of the legal compliance database created in the Contractors and Federal Spending Accountability Act and enacted in late 2008. Especially with the vast amounts of resources being expended now in the stimulus program, Federal agencies should have available the new legal compliance database to make sure resources are being spent only with legally compliant and reliable contractors. The cliché about an ounce of prevention being better than a pound of cure is most apt now in the context of the stimulus program, as even the vast amount of public disclosure contemplated in the administration of the stimulus program will not necessarily lead to effective vigilance before the fact of award in many cases. Problem avoidance in the first place is the aim of the quick development and consistent use of the legal compliance database in the pre-award screening/ responsibility determination process. On the question of public disclosure of the database, the QCA position has been neutral, preferring to focus instead on making sure that contracting officers use the data in the first place to make reliable and supportable contractor responsibility determinations in the interest of fair and high-quality competition for awards and ultimately better project performance because of that.

1.2 Evaluate major subcontractor performance for pre-award reviews –

The QCA also supports regulatory reforms and oversight to promote more regular use of post-contract evaluation reviews in awarding future work. QCA also recommends that regulators find a way to routinely evaluate subcontractor performance in greater relevant detail on Federal projects to be used in future contract award responsibility determinations for both prime contractors and subcontractors. In making this recommendation, QCA is aware that issues of prime contract and subcontract relations, and separation or privity of contract relations, may act as a barrier to comprehensive evaluations of subcontractor performance by contracting officers. However, it may be that this issue is part and parcel of the pronounced trend away from low-bid selection methods and the now predominant use of negotiated contractor selection methods to avoid the manifold performance problems stemming from the low-bid system. This is not to say that QCA opposes more discerning best-value negotiated selection methods. On the contrary, QCA has long been a proponent of best-value selection procedures. In that type of award process, the superior performance abilities and records of QCA firms and their workforces are evaluated and valued more appropriately in the overall team selection process. That's a competitive advantage that benefits project performance, the agency mission and top-flight performing contractors and subcontractors. Still nevertheless, QCA also strongly supports badly needed changes in the low-bid (price-only) contractor selection procedures, so that the invitation-for-bids (IFBs) selection system remains viable for projects of limited scope.

2. Construction contractor selection reforms. One of the primary areas of reform in Federal construction contractor selection procedures came in 1984 with the Competition in Contracting Act (CICA), when competitive negotiation selection procedures (RFPs) were finally permitted to be used by agencies on a par with the low-bid system, which up until then had been the predominant selection method. Over time, and because of the many performance and administrative problems that stemmed from low-bid, price-only selection, Federal agencies have moved away from low-bid selection substantially. (See graphs below.) In the main, that shift remains a very beneficial sea change for the industry and agency procurement programs. Still in all, the move away from the low-bid system blunted the motivation for agencies to face up to the need to enact reforms in the low-bid system for it to remain viable and beneficial. In short, instead of fixing the system, agencies largely just abandoned it. So, even now, where IFBs remain in use on projects of limited scope, the old problems persist unaddressed. In fact, with the advent of the internet purchasing systems, for a brief time several years ago, there was a fad to yet compound the systemic problems of low-bid selection – by using a publicly disclosed low-bid internet reverse auction system. Fortunately, the U.S. Army Corps of Engineers was called in to examine the process – and roundly and unequivocally condemned it for construction services procurement (not so for commodities, however).

2.1 Enact U.S. Army Corps of Engineers' recommendation to ban internet reverse auctions for construction contract selections – In FY 2003, the USACE test piloted use of internet reverse auctions for construction contract bidding. After pilot testing the internet publicly disclosed low-bid auction method on 5 projects, the USACE recommended unequivocally in its final report that : USACE would "not use reverse auctions for construction services"; adding that: "Reverse auctions have no valid method to measure savings, . . . are very labor intensive, [and] reverse auctions show no real return on investment."

Section 812 of H.R. 1815 in the 109th Congress attempted to enact the Corps' recommended ban in the bill passed by the House, but the measure was dropped in conference committee on the final National Defense Authorization Act for FY 2006. Action on this item remains necessary, however, as some agencies still occasionally attempt to use reverse auctions for construction services. (Final Report Regarding the U.S. Army Corps of Engineers Pilot Program on Reverse Auctioning, LTC A.J. Castaldo, Program Manager and Deputy PARC [not dated].)

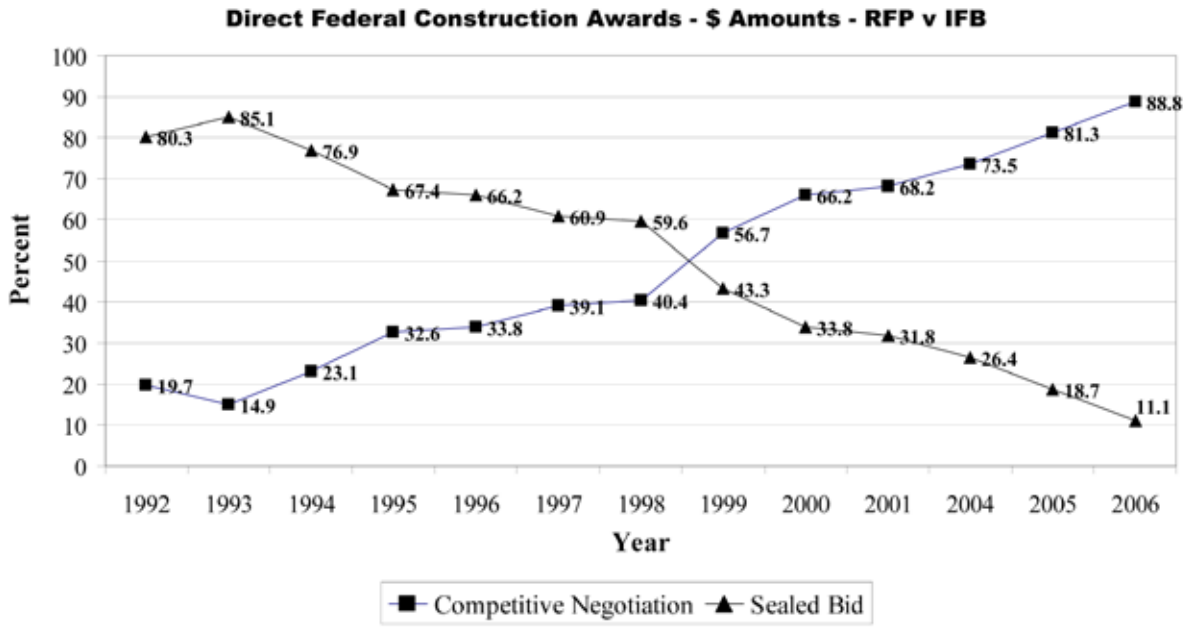
2.2 Block agencies from procuring construction services as though they were standard off-the-shelf commercial items. On July 3, 2003, the Administrator of the Office of Federal Procurement Policy (Director Angela Styles) issued a Memorandum directing senior procurement executives to review their agency guidance on commercial item procurement (Part 12 procedures) and rescind any guidance, memo, or authority that would encourage purchasing construction services as commercial items under

Part 12 of the FAR, and to make sure that construction services are procured under Part 36 of the FAR for construction purchasing. The Committee should again encourage and back up that directive as the reasons for it are even more compelling now with the stimulus bill spending unprecedented resources on construction, and with even more sophisticated "green building" projects, which are anything but commercial item procurements. Moreover, construction projects of various types have unique types of risks and issues (*e.g.,*unforeseen conditions, progress payments, warranties, etc) that aren't adequately addressed in the FAR commercial items contract terms. (OFPP Memorandum for Agency Senior Procurement Executives, Angela B. Styles, Administrator, Applicability of FAR Part 12 to Construction Acquisitions, July 3, 2003.)

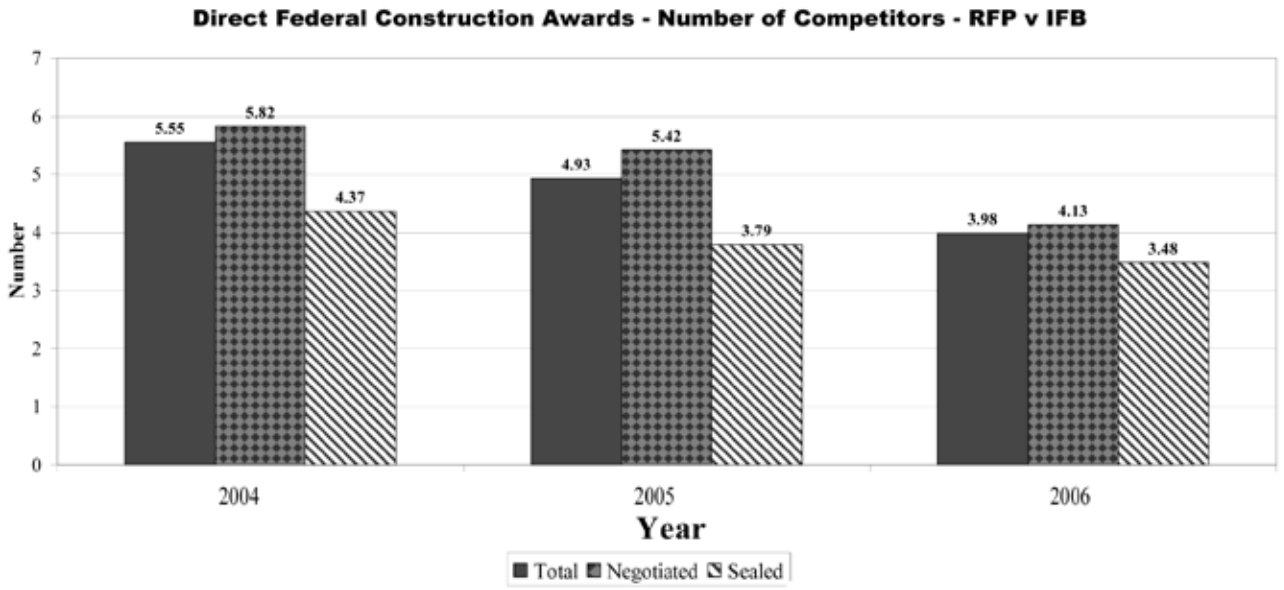
2.3 Require listing of major subcontractor bids on low-bid prime contractor selection procedures – Of all the problems inherent in the low-bid construction prime contractor selection procedures (among them poor design and bidding documents), none is more systemic and pervasive than the cascading adverse consequences that flow from post-award bid shopping and bid peddling. Virtually all prime contractor and subcontractor groups and professional services organizations roundly condemn the practice – yet even so, by most all accounts, bid shopping and bid peddling remain pervasive. No other single business practice/abuse does more to erode successful project performance and diminish taxpayer value and agency mission performance than having significant projects plagued by the consequences of post-award bid shopping auctions, with the successful prime contractor selling the project to the unfortunate subcontractor who is willing to go lowest after the prime contract has been awarded at a fixed price. The catalogue of abuses is long and well-recognized, including: substitutions of materials and poor performance, contract disputes and defensive contract administration, and claims and litigation taking value out of the agency's procurement program and putting it into legal overhead. In fact, since the 1984 Competition in Contracting Act permitted negotiated contractor selection procedures on a par with low-bid selection, Federal agencies have voted with their feet and moved away from low-bid selection almost entirely for construction projects of any size or scope.

In FY 2006, according to data from the Federal Procurement Data Service (FPDS), low-bid direct Federal construction project awards comprised only 22.7% of all contract actions (just 11.1% of all dollar volume), as compared with negotiated selection procedures comprising 77.3% of all awards (amounting to 88.8% of dollar volume). Clearly agencies prefer negotiated selection procedures to get best value for the taxpayer, rather than the low-bid system that is so vulnerable to problems stemming from price-only awards and bid shopping and bid peddling. To be fair, other business practice changes also contributed to that trend as well: primarily, the development of design-build project collaboration that involves all performing contractors more closely in design and project planning, so the agency gains the full value of prime and subcontractor professional expertise that is invested in the project from the beginning.

Percentage of Awards Using Competitive Negotiations (Request for Proposal (RFP) Selection Method
Percentage of Awards Using Sealed Bid (Invitation for Bid (IFB)) Selection Method



Percentage of Dollars Awarded Using Competitive Negotiations (Request for proposal (RFP)) Selection Method
Percentage of Dollars Awarded Using Sealed Bid (Invitation for Bid (IFB)) Selection Method



Average Number of Offers Received
Average Number of Offers Received When the Selection Method is Competitive Negotiations (Request for Proposal (RFP))
Average Number of Offers Received When the Selection Method is Sealed Bid (Invitation for Bid (IFB))

Nevertheless, the one surest way to moderate the velocity of this trend away from low-bid selection, and to preserve that system for the limited-scope projects, is to require bid listing of major subcontractors. If bid listing were required on IFBs, the prime contract bidders would have to list the sub bids it relied on in making its successful prime contract bid, and then award the work to the listed subcontractor at that price, with exceptions and substitution allowed only in exceptional circumstances -- in the manner set out in the Construction Quality Assurance Act (H.R. 3854) last introduced by Representative Kanjorski in the 110th Congress. If the subcontractor's work, proprietary judgments, and substantial expenses incurred in estimating the subcontract work are respected in this way in the post-award process, the project is already on a good start toward successful completion. If not, and bid shopping and peddling are allowed in a post award auction by the prime, almost always, significant adverse consequences for the project and the agency and taxpayer follow.

In the past, some agencies have opposed the use of bid listing on mainly administrative inconvenience grounds. That is, when virtually all projects were low bid, the bid listing process was seen as an administrative hindrance, even despite the fact that GSA used the process for some 20 years before rescinding it by rulemaking in 1983 (before CICA was enacted in 1984 notably). Also, in the past, prime contractors have raised arguments against bid listing based on privity of contract arguments. That is, the argument went, the Government was best served by exercising judgment and cognizance over just a single prime contract, and that the performance of major subcontractors actually performing most of the work on the project was somehow legally, if however inappropriately, beyond the ken of the procuring agency.

QCA submits that that position too has now been surpassed and superseded by current procurement law, selection procedures and practices, and new contracting patterns and procedures as well.

With the trend away from low-bid selection and the need to conserve Federal agency workforce resources, the time for bid listing has now arrived, as it could well save the use of price-only selection procedures and in so doing conserve agency contracting and project oversight resources. Moreover, the old fashioned privity of contract concept for construction projects has been abandoned now in the private sector with integrated project delivery contracting methods and other "relational" contracting patterns. Also, GSA and other agencies have adopted closely analogous procedures with agency "partnering", and design-build approaches to recognize the early participation of subcontractors in project design and planning to gain their expertise and added-value input, rather than losing that benefit for the project and the taxpayers in the old hierarchical privity of contract, stove-pipe contracting patterns.

3. Construction contract payment reforms. QCA's payment reform proposals address one very new and one rather older set of proposals – both of which would help construction program agencies realize the project performance benefits of prompt and fair payment procedures. It is axiomatic and proven that prompt payment processing and cash flow are key to successful project administration. The FAR recognized this when it eliminated routine payment withholding/retainage, and Congress did so in its Prompt Payment laws. That policy recognition should be reasserted and expanded.

3.1. Repeal the public contract 3% withholding tax well before it drains resources in planning for implementation in 2012 – In 2006, the Conference Report for the Tax Increase Prevention and Reconciliation Act (P.L. 109-22) included a new 3% withholding tax on all public contracts with public agencies with procurement budgets of $100 million or more. That new business withholding tax is now slated to take effect for contracts beginning in 2012. The law and proposed new Internal Revenue Service (IRS) regulations would require procurement agencies to hold 3% of every invoice of $10,000 or more and remit those funds to the Treasury, to be reclaimed later by covered prime contractors who establish tax compliance. While the Senate Finance Committee intended to score the measure as a way to gain revenue and close the tax gap by some tax delinquent public contractors, it is overbroad, and now unfortunately ensnares all covered prime contractors, those who are tax compliant and those who are not. Moreover, the non-dynamic budget scoring failed to take into consideration the enormous implementation costs for procurement agencies involved in implementing the measure that would draw down agency procurement budgets to act as IRS tax collector. In sum, the measure is badly flawed fiscal policy, and even worse procurement

policy. In two Federal prompt payment laws, Congress and the government operations/ procurement committees have long recognized that quick and reliable payment processing is one of the key ways agencies ensure successful project completion. The new 3% withholding tax militates against that established policy fundamentally.

DoD alone has estimated that the payment processing programming adjustments and financing costs stemming from the withholding would cost its procurement program budget some several billions of dollars over five years. The Internal Revenue Service has begun proposed regulations, gearing up for implementation in case Congress doesn't repeal this bit of mistaken procurement policy in time for regulatory implementation. Soon agencies will have to begin reprogramming payment systems to put the law into effect in 2012. IRS has so far limited the 3% withholding to invoices of $10,000 or more. Moreover, IRS has agreed that the withholding can't be passed through from prime contractors to subcontractors.

However, FAR regulators will have to write careful payment regulations to make sure this added IRS retainage is not held by primes against subcontract invoice amounts too. OFPP and the FAR Council should weigh in with IRS and OMB with a dynamic scoring of the cost of the withholding measure with all its implementation costs across direct federal agencies and grant programs to get a true measure of the overbearing compliance expense and costs as compared with a relatively meager IRS revenue gains.

QCA strongly urges the committee to take cognizance of current 3% withholding tax repeal bills, H.R. 275 and S. 292, and assert co-equal jurisdiction over the measure as a matter of adverse procurement policy.

3.2 Extend Federal construction prompt payment rules to federally assisted construction projects – When Congress enacted the Federal construction project prompt payment rules in 1987, it stopped short of extending the direct Federal rules to federally assisted contracts, as was originally proposed. Since then, the benefits of reliable payment processing have been recognized by reformed retainage policy too, disallowing standard payment retention on Federal contracts. Given the widely recognized project benefits of enhanced payment rules, the time is now appropriate for the Committee to propose extending the beneficial rules to federally assisted construction projects as well, as last proposed in S. 878 in the 103rd Congress. See also, GAO Report AFMD-89-33BR, March 10, 1989, *Prompt Payment: State Laws Are Similar to the Federal Act but Less Comprehensive*.

4. Construction project workforce issues – ensuring lawful employment of highly skilled workers, as a matter of project performance and security.

QCA members collectively bargain the highest workforce development, pay, training, and pension and health and welfare benefits in the industry. Virtually all QCA employer jobsite workers

are apprenticeship trained in mostly college-accredited training programs. The employment documentation, workforce stability and skills, and project security benefits of that employment model are of great benefit to agency procurement programs. QCA encourages the subcommittee and FAR regulators to consider a number of measures that would take maximum benefit of that advantage for the benefit of agency programs, industry workforce standards, and the taxpayers.

4.1 Issue specific regulatory guidance encouraging agencies to use project labor agreements on projects of significant size and scope to ensure a reliable supply of skilled construction craft workers – The QCA is a strong supporter of the Obama Administration's Executive Order (EO 13502,) permitting and encouraging Federal agencies to consider the benefits of project labor agreements (PLAs) to ensure the availability and benefits of a high-skill, legally employable workforce on direct Federal construction projects. We encourage the agencies to set a realistic threshold of project size and complexity as a guideline for PLA use, but also to allow consideration of special needs for particular projects of any size or scope because of special area conditions or otherwise exceptional project characteristics. Similarly, the QCA would encourage Federal agencies to include broad-based support for the collective bargaining systems in the geographic areas where any PLA is used. The workforce development, skills training, and employee benefits systems that develop and maintain the high-skill workforce relied on by a PLA are the direct result of local area collective bargaining agreements. For example, much of the Federal Green Jobs training programs that are part of the Administration's Green Jobs and Emerald Cities PLA programs rely on local jointly administered labor and management apprenticeship and training programs that stem from local area union and multiemployer collective bargaining systems.

4.2 Require use of E-Verify employment eligibility verification as a matter of workforce competence and project security – The QCA also supports the former Bush Administration's Executive Order requiring agencies to use E-Verify to check the lawful employment status of all workers on Federal projects and on contractor's payrolls generally as a matter of sound executive purchasing proprietary judgment. It is good business for agencies to make sure that taxpayer resources on those projects are being spent with legally compliant employers, so the projects don't suffer disruption in performance because of immigration enforcement. In fact, the Bush Administration EO, calling for effective safeguards against unlawful employment on projects in the first instance by use of E-Verify, merely enhances a prior Clinton Administration EO that called for debarment in instances of illegal employment violation. Both remain necessary elements of policy. QCA is discouraged by repeated delays in implementing that policy by the current Administration. However, QCA is encouraged too by the Department of Homeland Security's recent verbal support for E-Verify.

QCA also recognizes that E-Verify and the development of widespread use of Personal Identity Verification procedures on Federal projects and installations make background and project security procedures a virtual inevitability going forward. Now, project and site security too come into play with lawful employment verification. Unfortunately, unlawful employment and the closely coincident misclassification of workers on construction projects are fairly commonplace in the construction industry overall – much to the detriment of project performance, fair competition for projects among legally compliant employers, and the taxpayers generally. With improved funding reauthorization of E-Verify from Congress and steady improvements in its reliability, legally compliant firms are not disadvantaged by required use of an electronic system to make sure all firms on a project are following lawful employment policies. Executive Orders spanning the last two Administrations have long recognized that sound procurement policy requires vigilance with respect to lawful employment policies on direct Federal construction projects. QCA would urge the Committee to push for the deployment of the E-Verify rules on Federal projects in this Administration as well, and support reauthorization and full funding for E-Verify well into the indefinite future.

4.3 Consider contracting out for implementation of operations and maintenance on high-performance Federal buildings – QCA employers are actively engaged in developing Green Jobs training and workforce development programs. The jointly administered labor/management apprenticeship and training systems developed in our local collective bargaining systems are without parallel in this respect in all of the U.S. economy. The Federal Government's intention, to achieve a net-zero-energy and carbon neutral Federal building inventory over the next 20 years, is a highly laudable and necessary goal as a matter of national energy policy and building operations sustainability too. However, those ambitious goals will stretch the operations and maintenance workforce skills and abilities of government agency employees, even as the Federal government, like most employers, faces an adverse workforce demographic (the workforce is retiring faster than it is replenished) and skills deficit within its own ranks. QCA employers, as the leading suppliers of Green Jobs training and workforce development, should be relied on to an even greater degree by Federal facilities managers in contracting out for high performance building energy audits, metering, operations and maintenance, building systems commissioning, energy savings performance contracting and other services to help meet the Federal energy policy goals with respect to the government building stock – both leased and owned facilities. High performance building operations and maintenance is not an inherently governmental function and should be contracted out for the mutual benefit of agency budgets, the taxpayers, and the private sector.

Respectfully submitted – QCA employers associations.

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