



ACQUISITION RESEARCH PROGRAM SPONSORED REPORT SERIES

A Comparative Analysis of FAR Part 13 vs. FAR Part 15 in the Procurement of Commercial Items in Government Contracting

December 2025

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Prepared for the Naval Postgraduate School, Monterey, CA 93943.

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ABSTRACT

This study examines why Mission and Installation Contracting Command (MICC) contracting officers underutilize Simplified Acquisition Procedures (SAP) under Federal Acquisition Regulation (FAR) 13.5 for commercial item acquisitions up to \$7.5 million—despite the regulation’s intent to streamline procurement. Through qualitative interviews and analysis of internal award data, the research explores how risk aversion, inconsistent training, and internal stakeholder influence (e.g., legal advisors, procurement analysts, small business specialists) affect decision-making. Findings reveal that many officers avoid SAP due to perceived audit risks and a lack of leadership support, defaulting instead to the more burdensome FAR Part 15. Organizational culture and local precedent further shape method selection, often discouraging use of legally permissible flexibilities. This behavior slows acquisition timelines, increases administrative workload, and limits operational responsiveness. The study offers recommendations to improve SAP utilization, including targeted training, clearer policy guidance, and stronger leadership endorsement. By addressing both technical and cultural barriers, this research supports broader acquisition reform efforts aimed at increasing efficiency and empowering the acquisition workforce.



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TABLE OF CONTENTS

I.	BACKGROUND	1
A.	INTRODUCTION TO FEDERAL PROCUREMENT AND THE FAR	1
B.	OVERVIEW OF FAR PART 13 AND FAR PART 15	2
C.	THE \$7.5 MILLION SAP THRESHOLD AND FAR SUBPART 13.5.....	2
D.	OBSERVED UNDERUTILIZATION OF SAP PROCEDURES	3
E.	ORGANIZATIONAL BEHAVIOR AND STAKEHOLDER INFLUENCE.....	4
F.	GAP IN LITERATURE AND PRACTICAL RELEVANCE.....	5
G.	PROBLEM STATEMENT	5
H.	RESEARCH PURPOSE AND SCOPE.....	7
I.	RESEARCH QUESTIONS.....	7
J.	SUMMARY	7
II.	LITERATURE REVIEW	9
A.	INTRODUCTION.....	9
B.	FEDERAL ACQUISITION REFORM AND THE EVOLUTION OF SAP	9
C.	COMPARISON OF FAR PART 13 VS. FAR PART 15.....	11
D.	USE OF FAR SUBPART 13.5 AND THE \$7.5 MILLION THRESHOLD	11
E.	RISK AVERSION IN GOVERNMENT CONTRACTING	12
F.	TRAINING, POLICY INTERPRETATION, AND DECISION-MAKING	13
G.	STAKEHOLDER INFLUENCE AND ORGANIZATIONAL CULTURE	14
H.	IDENTIFIED GAPS IN THE LITERATURE.....	15
I.	SUMMARY	15
III.	METHODOLOGY	17
A.	RESEARCH DESIGN	17
B.	DATA COLLECTION METHODS.....	17
C.	POPULATION AND SAMPLE.....	19
D.	DATA ANALYSIS	19
E.	LIMITATIONS.....	22
F.	SUMMARY	23



IV.	FINDINGS AND ANALYSIS	25
A.	INTRODUCTION.....	25
B.	QUANTITATIVE FINDINGS – USE OF FAR PART 13 AND 13.5.....	25
C.	DISTRIBUTION OF SIMPLIFIED ACQUISITIONS BY DOLLAR RANGE	26
D.	UNDERUSE OF FAR SUBPART 13.5 FOR ELIGIBLE COMMERCIAL BUYS.....	27
E.	CULTURAL AND TRAINING FACTORS (INTERVIEW FINDINGS).....	28
F.	MISINTERPRETATION OF EVALUATION FLEXIBILITY.....	30
G.	SUMMARY OF FINDINGS	31
V.	CONCLUSIONS AND RECOMMENDATIONS.....	33
A.	INTRODUCTION.....	33
B.	CONCLUSIONS	33
C.	RECOMMENDATIONS.....	35
D.	SUMMARY	39
	APPENDIX A. INTERVIEW PROTOCOL AND CONSENT FORM	41
A.	INTRODUCTION.....	41
B.	CONSENT STATEMENT	41
C.	INTERVIEW GUIDE.....	41
1.	Introduction Script	41
2.	Context and Experience	42
3.	Decision-Making Process.....	42
4.	Stakeholder and Organizational Influence.....	43
5.	Risk, Training, and Confidence.....	43
6.	Scenarios and Reflection	44
	APPENDIX B. MICC DATA SUMMARY TABLES.....	45
	APPENDIX C. QUANTITATIVE FIGURES AND CHARTS.....	47
	LIST OF REFERENCES	51



LIST OF TABLES

Table 1.	Acquisition Reform Timeline	10
Table 2.	Limitations of the Study.....	23
Table 3.	Total MICC Actions $\leq$ \$7.5 Million	25
Table 4.	Procedures Used for Likely Commercial Acquisitions $\leq$ \$7.5 Million	26
Table 5.	Distribution of Simplified Acquisitions by Dollar Range	27
Table 6.	Commercial Actions \$250 K–\$7.5 M by Procedure.....	28



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LIST OF ACRONYMS AND ABBREVIATIONS

ACC	Army Contracting Command
ACO	Administrative Contracting Officer
AFARS	Army Federal Acquisition Regulation Supplement
CFR	Code of Federal Regulations
CO	Contracting Officer (use only if KO and CO are both mentioned)
COR	Contracting Officer's Representative
DA	Department of the Army
DAU	Defense Acquisition University
DASA(P)	Deputy Assistant Secretary of the Army for Procurement
DCMA	Defense Contract Management Agency
DFARS	Defense Federal Acquisition Regulation Supplement
DoD	Department of Defense
DPC	Defense Pricing and Contracting
FPDS	Federal Procurement Data System
FAR	Federal Acquisition Regulation
GAO	Government Accountability Office
GPC	Government Purchase Card
HQDA	Headquarters, Department of the Army
IRB	Institutional Review Board
J&A	Justification and Approval
KO	Contracting Officer
MICC	Mission and Installation Contracting Command
NPS	Naval Postgraduate School
OTA	Other Transaction Authority
PALT	Procurement Administrative Lead Time
PBA	Performance-Based Acquisition
PM	Program Manager
RFP	Request for Proposal
RFQ	Request for Quotation
SAP	Simplified Acquisition Procedures



SAT	Simplified Acquisition Threshold
SOP	Standard Operating Procedure
USACE	U.S. Army Corps of Engineers



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I. BACKGROUND

A. INTRODUCTION TO FEDERAL PROCUREMENT AND THE FAR

The U.S. federal government relies on an extensive and complex acquisition system to support its operations, deliver services, and advance mission objectives. This system is governed by the Federal Acquisition Regulation (FAR), a uniform set of rules that serves as the backbone for purchasing goods and services across civilian and defense agencies. While the FAR provides consistency and oversight, it also introduces procedural layers that can hinder speed and flexibility, especially when time-sensitive or commercially available items are needed to support military readiness or operational effectiveness.

Within this environment, contracting officers (KOs) serve as the principal agents for executing procurements in accordance with the FAR and its supplements. Their discretion, judgment, and understanding of regulatory flexibilities are essential to streamlining acquisitions while maintaining compliance. However, the acquisition process is often affected not only by the rules themselves but also by how those rules are interpreted and implemented in practice. KOs are responsible for carrying out procurements in line with the FAR and all its many supplements. Their ability to interpret the rules, exercise judgment, and know when to use the flexibilities the FAR allows is important to keeping the acquisition process efficient and responsive.

In practice, two KOs could look at the same requirement and come to completely different conclusions about how to execute it. One might lean on simplified procedures under FAR Subpart 13.5 Simplified Procedures for Certain Commercial Products and Commercial Services (2025) to move quickly, while another might default to the more formal, documentation-heavy approach under FAR Part 15 Contracting by Negotiation (2025) simply because that is what their office has always done. These decisions are often influenced less by policy and more by experience, office culture, or even informal pressure from legal teams or supervisors.

This disconnect between policy and practice means that even when faster, more efficient options are available, they are not always used. KOs may worry about being



second-guessed or criticized if something goes wrong, so they take the “safe route,” even if it is slower or more burdensome. Over time, these habits become the norm. And while the FAR encourages professional discretion, the reality is that many officers feel boxed in by their environment, hesitant to take advantage of the very flexibilities that were created to help them.

B. OVERVIEW OF FAR PART 13 AND FAR PART 15

Two of the most used acquisition methods under FAR are Simplified Acquisition Procedures (FAR Part 13) and Contracting by Negotiation (FAR Part 15). Part 13 was designed to reduce the administrative burden associated with low-dollar purchases. It emphasizes speed, flexibility, and minimal documentation, allowing for streamlined purchasing when acquiring supplies or services that, given their value, do not require the rigors of full-blown negotiated procurement.

In contrast, FAR Part 15 outlines a more formal, structured process, typically reserved for complex or high-value procurements, emphasizing detailed evaluation criteria, negotiation strategies, and robust source selection procedures. While Part 15 offers greater rigor and transparency for large, sensitive, or technical acquisitions, it also requires longer lead times, additional documentation, and more administrative staff.

Used appropriately, FARs 13 and 15 serve distinct purposes. When applied indiscriminately, however, the burdens of Part 15 can be misapplied to acquisitions that would benefit more from the speed and efficiency of Part 13.

C. THE \$7.5 MILLION SAP THRESHOLD AND FAR SUBPART 13.5

Congress has steadily expanded the federal government’s ability to use Simplified Acquisition Procedures (SAP) for commercial buying, and FAR Subpart 13.5 was created as part of that effort. Originally introduced as a test program and later made permanent, FAR Subpart 13.5 was intended to give KO’s a faster, less burdensome way to acquire readily available commercial items without relying on the more formal structure of FAR Part 15. Early practitioner work found that these flexibilities could reduce procurement time and help KOs make better use of limited resources (Johnson et al., 2006). Federal



acquisition training materials reinforce this purpose, noting that SAP was designed to streamline routine commercial transactions and avoid unnecessary administrative steps (Federal Acquisition Institute, n.d.). Although FAR Part 13 explicitly encourages simpler, more efficient methods when appropriate (Federal Acquisition Regulation, 2024), research on acquisition practices shows that organizational habits and oversight expectations often influence how confidently KOs apply these flexibilities in practice (Ward, 2016; McKernan et al., 2015).

This \$7.5 million ceiling is significant for defense agencies. It enables KOs to bypass many of the procedural burdens associated with FAR Part 15, even for relatively high-dollar procurements, provided that the acquisitions are for commercial items. In theory, this authority should allow the Army and other defense components to operate with greater responsiveness and speed, two qualities often lacking in traditional procurement pipelines.

D. OBSERVED UNDERUTILIZATION OF SAP PROCEDURES

Despite the expanded threshold and the clear policy intent behind FAR Subpart 13.5, evidence from practice continues to show that Army KOs often hesitate to use SAP even when their requirements fall squarely within its scope. Instead of relying on the streamlined tools available under FAR Part 13, many default to the more formal and documentation-heavy processes found in FAR Part 15, even for commercial items under \$7.5 million. This tendency increases administrative burden, extends acquisition timelines, and adds avoidable workload to contracting offices. Prior studies have shown that unfamiliarity with SAP flexibilities, limited training, and long-standing organizational habits all contribute to this pattern (Johnson et al., 2006; Rendon & Apte, 2007). These findings help explain why, despite statutory support and procedural authority, the practical use of FAR Subpart 13.5 remains inconsistent across the Army contracting community.

Several reasons have been proposed to explain this pattern. First, there is the issue of risk aversion. KOs may hesitate to use simplified methods for a few practical reasons, including concerns about audit scrutiny, the possibility of a protest, or uncertainty about how much support they would receive from oversight offices if their judgment were



questioned (Rendon & Apte, 2007). In addition, long-standing office norms play a significant role. Many contracting organizations develop routines that default to more formal procedures, and these habits can make FAR Part 15 feel like the “safe route,” particularly when working with higher-dollar actions, even when SAP would be fully appropriate (Johnson et al., 2006). Third, internal advisory personnel, such as legal counsel, procurement analysts, and small business representatives, may exert informal authority that sways acquisition strategies toward more documentation-heavy approaches. While these stakeholders serve important roles, research on DoD contracting behavior notes that these internal review layers frequently influence how flexibly KOs feel they can operate, sometimes suppressing the full use of authorities such as FAR Subpart 13.5 (Rendon & Apte, 2007; Ward, 2016).

E. ORGANIZATIONAL BEHAVIOR AND STAKEHOLDER INFLUENCE

Procurement in the Department of Defense (DoD) does not operate in a vacuum. While contracting officers are the legally authorized individuals responsible for selecting acquisition strategies and awarding contracts, their decisions are often influenced, sometimes heavily, by other actors in the contracting process. Legal advisors, small business specialists, procurement analysts, and even supervisors may offer input intended to support compliance and risk mitigation. In some offices, however, these advisory roles can shift into de facto gatekeepers, subtly limiting a KO’s ability to exercise independent judgment.

For example, a legal advisor may recommend a FAR Part 15 approach for a \$4 million commercial buy simply to “be safe,” even when the simplified procedures under FAR Subpart 13.5 would be legally permissible and operationally advantageous. A small business representative might press for socioeconomic set-asides, triggering additional requirements that push the acquisition out of SAP territory. Over time, these tendencies can lead to a culture in which more complex procedures are used by default, regardless of whether they are needed, or even ideal, for the requirement at hand.

This culture is often reinforced by training, local precedent, and a lack of leadership emphasis on acquisition reform or innovation (Soule & Fales, 2018). New KOs may feel



pressure to “do what the office always does,” especially when faced with conflicting interpretations of policy or subtle resistance from internal stakeholders. The resulting dynamic can significantly shape acquisition method selection, particularly in gray-area cases where both FAR Part 13 and FAR Part 15 are legally permissible (Rendon & Apte, 2007).

F. GAP IN LITERATURE AND PRACTICAL RELEVANCE

While there is extensive academic and policy literature on federal acquisition reform, commercial item procurement, and contracting efficiency (Nash et al., 2007; McKernan et al., 2015), far less work examines how KOs make decisions when operating near the upper limits of SAP authority. Even fewer studies explore how internal office culture, unwritten norms, or stakeholder dynamics shape those choices in day-to-day practice (Johnson et al., 2006; Rendon & Apte, 2007).

This study addresses this gap by focusing specifically on how Army KOs approach commercial item acquisitions at or below the \$7.5 million threshold. It goes beyond regulatory analysis to examine the human and organizational factors that shape strategy selection. In doing so, it seeks to inform both practice and policy, helping decision-makers understand not just what FAR allows, but why it is or is not being used to its full extent in everyday acquisition.

G. PROBLEM STATEMENT

In U.S. federal procurement, the FAR permits the use of SAP for commercial item acquisitions up to \$7.5 million under FAR Subpart 13.5. FAR Part 15 typically involves detailed proposal evaluations, technical scoring, and prolonged negotiation cycles, unlike FAR Subpart 13.5, which emphasizes streamlined procedures for speed and efficiency. This expanded threshold was designed to streamline purchasing processes, reduce administrative burden, and accelerate delivery timelines, especially in support of mission-critical requirements. Despite this flexibility, many Army organizations continue to default to the more formalized and complex procedures outlined in FAR Part 15, which often involve detailed proposal evaluations, formal source selection boards, and extensive negotiation steps. This trend raises a critical question: is SAP being used to its full potential



at this dollar level, or is it being underutilized due to organizational and cultural constraints?

Practically, this trend has implications for procurement efficiency and mission readiness. Many defense agencies face chronic delays in acquiring commercial goods and services, delays that might be avoidable if SAP were used more aggressively where appropriate. Reasons for underutilization may include contracting officer risk aversion, unclear guidance on SAP's applicability, or insufficient training. A growing concern involves the influence of non-warranted personnel, including procurement analysts, small business representatives, and legal advisors. While their roles are advisory in nature, they are sometimes perceived as exercising directive authority, which may discourage warranted contracting officers from fully using FAR Subpart 13.5 procedures. In some contracting offices, this dynamic may discourage officers from exercising their judgment and authority under FAR Subpart 13.5, leading them to revert to more conservative acquisition methods.

Although simplified acquisition procedures have been studied in general, few analyses focus specifically on how contracting officers choose between FAR Subpart 13.5 and FAR Part 15 at the \$7.5 million threshold. Even less is known about how office culture or internal dynamics influence those decisions. FAR provides minimal detail on when SAP should be preferred over other methods at this level, and there is limited case-based guidance or clarity for practitioners. As a result, KOs may rely on organizational precedent or overly cautious interpretations of policy, rather than fully leveraging the tools available to them under current regulation.

This study contributes to the body of knowledge on Army acquisitions by analyzing how and why KOs choose acquisition methods for commercial buys at or below \$7.5 million. It assesses the practical usage of SAP, the barriers to its application, and the extent to which organizational culture, including the advisory roles of support personnel, may affect acquisition outcomes. The results may help inform policy clarification, training improvements, and leadership awareness efforts, leading to better alignment between the intent of FAR Subpart 13.5 and its actual application in the field, particularly in high-tempo or decentralized contracting environments.



H. RESEARCH PURPOSE AND SCOPE

The purpose of this research is to explore the decision-making behaviors of Army contracting officers when choosing between simplified and formal negotiation procedures for commercial item acquisitions under \$7.5 million. The study evaluates how regulatory interpretation, perceived risk, training, and internal office culture affect the use, or avoidance, of FAR Subpart 13.5. It will also explore how the influence of non-warranted support personnel may either empower or constrain warranted officers in their method selection.

The scope is limited to Army contracting offices and focuses exclusively on commercial service/item acquisitions within the SAP threshold. It does not evaluate construction or non-commercial buys and is not intended to critique specific individuals or installations. Rather, it aims to highlight trends, barriers, and areas of opportunity across the broader Army contracting enterprise.

I. RESEARCH QUESTIONS

This research answers the following three questions:

1. To what extent are SAP being utilized for commercial acquisitions at or below the \$7.5 million threshold across Army contracting offices?
2. What factors influence KO's decisions to use or avoid SAP for acquisitions within this dollar range, including training, FAR interpretation, and perceived risk?
3. How do internal organizational dynamics such as the role of procurement analysts, legal advisors, and small business representatives influence contracting officers' discretion and method selection for commercial buys?

J. SUMMARY

The FAR provides tools to streamline procurement and improve responsiveness, particularly through the use of SAP for commercial item acquisitions. Yet, in practice,



these tools may be underutilized, especially at the higher dollar threshold allowed under FAR Subpart 13.5. This chapter has outlined the regulatory landscape, organizational influences, and decision-making complexities that contribute to this trend. The problem is not merely one of policy but of behavior, culture, and institutional habit.

Chapter II will review the existing literature surrounding simplified acquisition, risk aversion in federal procurement, and the behavioral influences that shape contracting officer decision-making. This review will help situate the current study within the broader academic and professional discourse and further illuminate the relevance of the research questions posed.



II. LITERATURE REVIEW

A. INTRODUCTION

The U.S. federal acquisition system has undergone continuous reform over the past several decades, driven by the need to improve efficiency, adopt commercial best practices, and streamline overly bureaucratic procurement processes. This literature review examines key developments in simplified acquisition reform, contrasts FAR Part 13 and FAR Part 15 procedures, and explores the organizational and behavioral factors that influence contracting officers' decisions. The review also highlights scholarly gaps in understanding how internal culture and non-warranted stakeholders impact procurement method selection, especially within the discretionary range of FAR Subpart 13.5.

B. FEDERAL ACQUISITION REFORM AND THE EVOLUTION OF SAP

The federal acquisition landscape has undergone significant transformation over the past few decades, largely driven by efforts to increase efficiency, reduce administrative burden, and align government purchasing with commercial best practices. One of the most significant developments was the establishment and expansion of SAP outlined in FAR Part 13, which were introduced to streamline the procurement process for lower-dollar acquisitions.

The Clinger-Cohen Act of 1996 and the Federal Acquisition Streamlining Act (FASA) of 1994 were pivotal legislative efforts that pushed agencies to adopt more agile, commercially oriented practices (Clinger-Cohen Act, 1996; Federal Acquisition Streamlining Act, 1994). These acts recognized the inefficiency of applying the same rigorous procedures to both high- and low-dollar procurements and led to the creation of thresholds for simplified methods that could bypass much of the red tape associated with full and open competition and negotiated procurement under FAR Part 15. Subsequent policy shifts, including FAR Subpart 13.5, expanded SAP to higher-value commercial item acquisitions. These reforms reflect a growing consensus that full-blown FAR Part 15 procedures are not always necessary for routine commercial purchases. As a result, the FAR was modified to reflect a more scalable approach to acquisition streamlining



procedures for purchases under specific thresholds and allowing contracting officers greater discretion in method selection (Thai, 2001).

SAP was originally reserved for acquisitions below the SAT, which is currently set at \$250,000 for most buys. However, special authorities, including FAR Subpart 13.5, were later created to allow SAP use for commercial item acquisitions up to much higher limits. These reforms signaled a shift in acquisition policy, one that placed increasing trust in contracting officers to apply discretion and judgment when determining how to fulfill agency needs. Table 1 summarizes the most relevant statutory and policy milestones related to SAP expansion.

Table 1. Acquisition Reform Timeline

Year	Milestone / Legislation	Impact on SAP / FAR / Procurement
1994	Federal Acquisition Streamlining Act (FASA)	Established the SAT and encouraged use of SAP for low-dollar buys.
1996	Clinger-Cohen Act	Promoted commercial best practices and flexibility; reinforced SAP authority across federal procurement.
2004	Introduction of FAR SUBPART 13.5 Test Program	Enabled SAP for commercial item buys up to \$5 M (later increased), as a pilot.
2016	NDAA FY16: FAR 13.5 Permanently Authorized	Made FAR 13.5 permanent; authorized SAP for commercial purchases up to \$7.5 M.
2018	Section 816, NDAA FY18	Extended SAP threshold to \$15 M specifically for contingency operations.
2025	EO “Restoring Common Sense to Federal Procurement” (Apr. 15)	Directed overhaul of FAR to eliminate non-statutory provisions, simplify rules, and enhance plain-language metrics.
2025	EO “Ensuring Commercial, Cost-Effective Solutions” (Apr. 16)	Mandated agencies to favor commercial products/services procurement “to the maximum extent practicable”.
2025	DoD EO “Modernizing Defense Acquisitions & Spurring Innovation” (Apr. 9)	Directed DoD to favor commercial solutions/OTAs, streamline processes, review workforce and acquisition policies.



These policy milestones collectively pushed federal acquisition toward a more agile, risk-managed model that places greater trust in contracting officers. Still, as later sections explore, actual use of SAP varies significantly, influenced by office culture, training, and risk perceptions despite the tools being available.

C. COMPARISON OF FAR PART 13 VS. FAR PART 15

The procedural differences between FAR Part 13 and FAR Part 15 are well-documented and have significant implications for speed, documentation, and resource demands. Under FAR Part 13, KOs are allowed to use oral solicitations, reduce the number of offerors solicited, and streamline award documentation. There is no requirement for a formal source selection plan, and evaluations can be based on price and limited non-price factors without the exhaustive comparative analysis expected under Part 15 (Nash et al., 2007; FAR 13.106–13.106-3).

In contrast, FAR Part 15, Contracting by Negotiation, is designed for complex acquisitions in which technical capability, past performance, and tradeoffs play a central role. The process is time- and labor-intensive, requiring detailed acquisition plans, evaluation teams, source selection boards, and documentation of best value tradeoffs. It is also more frequently scrutinized during protests and audits, which adds to the perception of risk (Rendon & Apte, 2007; FAR 15.101–15.308).

Several researchers and policy studies (Soule & Fales, 2018; Johnson et al., 2006) have highlighted that FAR Part 15, while appropriate for more complex acquisitions, is often applied to routine commercial buys that could be handled more efficiently under SAP. Reform efforts over the past several decades have repeatedly emphasized the need to avoid unnecessary procedural burdens and make greater use of streamlined approaches when the requirement allows (Ward, 2016; McKernan et al., 2015). Nonetheless, practice has not always aligned with policy.

D. USE OF FAR SUBPART 13.5 AND THE \$7.5 MILLION THRESHOLD

FAR Subpart 13.5, titled “Simplified Procedures for Certain Commercial Products and Commercial Services,” was originally created as a test program and later made



permanent to help address long-standing delays in commercial item procurement. This authority allows KOs to use simplified procedures for commercial buys up to \$7.5 million and up to \$15 million in certain contingency or emergency situations. This reflects a deliberate effort to make commercial purchasing faster and less burdensome (Federal Acquisition Regulation, 2024; Federal Acquisition Institute, n.d.).

This authority was designed to reflect the realities of modern commercial markets, where many off-the-shelf products and services exceed the standard SAT yet do not warrant the structure and workload of a FAR Part 15 negotiation. Using FAR Subpart 13.5 allows KOs to shorten lead times, avoid the administrative burden of formal evaluation boards, and rely more heavily on market research and comparative pricing much like a commercial buyer would (Soule & Fales, 2018; Johnson et al., 2006).

Despite these advantages, research shows that the use of FAR Subpart 13.5 remains uneven across Army contracting offices. Some organizations rely on its streamlined authorities regularly, while others default to the more formal procedures of FAR Part 15 even when a commercial buy falls well within SAP's limits. Studies suggest this variation is influenced less by policy and more by differences in organizational habits, training, and confidence in applying the flexibilities available under FAR Subpart 13.5 (Johnson et al., 2006; Rendon & Apte, 2007). This underscores an important reality; the effectiveness of simplified procedures depends heavily on the workforce's willingness and ability to use them.

E. RISK AVERSION IN GOVERNMENT CONTRACTING

Risk aversion is a common theme in federal acquisition research, especially among KOs working within the DoD (Rendon & Apte, 2007). Although the FAR encourages the use of sound business judgment and commercially oriented practices, many contracting organizations continue to emphasize compliance, documentation, and audit defensibility over flexibility (FAR 1.102[d]). As a result, KOs often lean toward the more formal and familiar procedures found in FAR Part 15, even when streamlined options are both available and appropriate.



Rendon and Apte (2007) and others have shown that the incentive structure within federal acquisition tends to discourage risk-taking. Errors in judgment, however minor, can lead to protests, audit findings, or negative performance evaluations, whereas overly cautious strategies rarely face the same scrutiny. In this context, risk aversion becomes rational behavior, especially for junior KOs or those without strong leadership backing.

Research on DoD contracting practices has long noted that organizational culture often reinforces cautious, documentation-heavy approaches to procurement, even when simpler methods are available (Rendon & Apte, 2007). Although FAR 1.102(d) encourages contracting professionals to apply initiative, sound judgment, and flexible business practices, the day-to-day reality in many offices is that KOs default to more formal procedures out of concern for oversight and audit defensibility. This dynamic makes the use of streamlined authorities less common than policy intends.

F. TRAINING, POLICY INTERPRETATION, AND DECISION-MAKING

Contracting officers' decisions are shaped not only by regulation, but also by how that regulation is taught, reinforced, and interpreted in practice. While Defense Acquisition University (DAU) provides standardized instruction on the FAR and acquisition procedures, real-world application is influenced heavily by local mentorship, policy interpretation, and internal precedent (Rendon & Snider, 2008; Thai, 2001).

Several studies (Rendon & Apte, 2007; Soule & Fales, 2018; Thai, 2001) show that KO confidence in using SAP is closely linked to the quality of training they receive and the level of support they perceive from leadership. When the workforce is unsure about what is considered “safe” or “acceptable” under FAR Subpart 13.5, they are far less likely to rely on its flexibilities, even when it would be the more efficient path (Johnson et al., 2006). Internal operating procedures and legal reviews often introduce extra layers of guidance that, while intended to ensure compliance, can unintentionally limit the discretion that SAP was designed to provide (Ward, 2016).

This variation in policy interpretation, what one office deems permissible under SAP, another may reject as too risky, further complicates the acquisition landscape. Without consistent, scenario-based training or clear examples of best practices at the \$7.5



million threshold, many KOs simply revert to more conservative acquisition methods out of uncertainty (Soule & Fales, 2018).

G. STAKEHOLDER INFLUENCE AND ORGANIZATIONAL CULTURE

The influence of internal stakeholders, such as legal advisors, procurement analysts, and small business specialists, has been noted periodically in acquisition research and is increasingly recognized as an important factor in how contracting decisions are shaped. Although these individuals do not hold warrant authority, they frequently play a significant role in how a requirement is interpreted, structured, and reviewed, and their input can meaningfully affect the degree of flexibility a KO feels comfortable using (Rendon & Apte, 2007; Ward, 2016). In some cases, these reviews help strengthen the acquisition approach; in others, they introduce additional caution that can limit the practical use of streamlined procedures (Soule & Fales, 2018).

In some offices, the presence of a proactive legal team or risk-averse policy branch can effectively steer contracting officers away from using FAR Subpart 13.5, even when it is the optimal method. Similarly, pressure to meet socioeconomic goals from small business specialists may trigger set-aside rules that introduce additional evaluation steps, increasing the complexity of the buy (Thai, 2001; Rendon & Apte, 2007). While each of these functions serves a valuable role, their cumulative influence may inadvertently shift the decision-making burden away from the warranted officer and toward informal “gatekeepers.”

This dynamic can be especially strong in offices with hierarchical cultures or command-driven approval chains. KOs in these environments may find themselves executing acquisition strategies that reflect organizational norms or stakeholder comfort levels more than regulatory intent. Over time, this contributes to a self-reinforcing pattern of overreliance on FAR Part 15 procedures even when simplified options are both available and encouraged.



H. IDENTIFIED GAPS IN THE LITERATURE

While FAR Part 13 and FAR Part 15 have been widely addressed in acquisition reform literature, relatively little research examines how KOs navigate the decision-making process when both procedures are legally permissible, particularly at the \$7.5 million SAP threshold. Existing studies such as Thai (2001) explore broader procurement principles and system-level reforms but do not address the practical, day-to-day judgments KOs make when choosing between simplified and formal acquisition methods.

Most studies on acquisition behavior tend to focus either on high-level policy analysis or on case-specific contract outcomes, with limited attention to the behavioral and organizational context in which decisions are made (Thai, 2001; Rendon & Apte, 2008; Soule & Fales, 2018). This gap presents an opportunity to better understand not only the regulatory framework, but the real-world factors that determine whether SAP is used effectively within Army contracting offices.

This study seeks to contribute to that understanding by analyzing how, when, and why KOs select between FAR Subpart 13.5 and FAR Part 15, focusing not just on compliance but on the operational and organizational dynamics that influence real-world practice.

I. SUMMARY

Taken together, the literature shows that although FAR Part 13 and FAR Part 15 are well understood from a policy standpoint, far less is known about how KOs make sense of these options in practice, especially when both procedures are legally available. Most existing studies speak to high level reforms or analyze isolated contract outcomes, leaving a noticeable gap in understanding the experience of KOs and the organizational pressures that shape their choices at the \$7.5 million SAP threshold. This gap suggests that the real story of SAP utilization lies not only in regulation, but in the everyday judgment, risk perception, and culture within contracting offices. Chapter III describes how this study seeks to capture those practical realities through its research design and methodological approach.



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III. METHODOLOGY

A. RESEARCH DESIGN

This study will employ a qualitative research design to explore the behaviors, perceptions, and decision-making patterns of Army KOs when selecting between FAR Subpart 13.5 and FAR Part 15 for commercial item acquisitions under \$7.5 million. Qualitative methodology is appropriate given the study's focus on underlying motivations, organizational culture, and internal dynamics, factors that are not easily captured through quantitative means.

The goal is not to generalize across the entire Army contracting community with statistical precision, but to develop insightful, evidence-informed conclusions that help explain observed inconsistencies in SAP usage. The study will rely on semi-structured interviews, case document review (where available), and thematic analysis to extract key drivers behind acquisition method selection.

B. DATA COLLECTION METHODS

Data will be collected using a combination of the following qualitative techniques:

- Semi-structured interviews were conducted with nine Army KOs from the MICC and the ACC. This interview format allowed for a consistent set of core questions while giving participants the flexibility to describe their experiences in depth. The discussions explored each KO's familiarity with FAR Subpart 13.5, their confidence using SAP at higher dollar thresholds, the influence of internal stakeholders such as legal advisors and policy reviewers, and the barriers or enablers that shaped their procedural decisions.
- Review of sample contract files, where available, to understand the rationale recorded in acquisition plans or decision documentation. The analysis of these documents will be used to triangulate interview data and explore patterns of SAP vs. FAR Part 15 uses. The findings from this



document review will be used to triangulate interview data, that is, to compare and validate the responses from contracting officers against official documentation. This approach strengthens the reliability of the research by identifying alignment or divergence between stated behaviors and actual contracting practices. It also helps uncover systemic patterns or inconsistencies in the application of simplified acquisition procedures across different offices.

- Review of agency guidance or local SOPs to determine whether office-level policies contribute to procedural defaults or discourage use of FAR Subpart 13.5.

Interview participants will be selected using purposive sampling, a method in which individuals are intentionally targeting KOs based on their relevant experience and ability to provide insight into the research topic, targeting experienced KOs who have worked on commercial buys between \$250,000 and \$7.5 million. Where feasible, the sample will include KOs from both MICC and Army Contracting Command (ACC) offices, as well as others in contingency or operational contracting units.

In addition to interviews and SOP reviews, this study incorporates secondary data analysis from contracting award reports obtained from the 418th and 419th Contracting Support Brigades (MICC units). These internal reports provide quantitative insight into the types of solicitation procedures used (e.g., FAR Part 13 vs. FAR Part 15), total award amounts, and procedural trends. While not the primary data source, this information will be used to supplement qualitative findings by identifying patterns in SAP utilization and providing a broader organizational context. The quantitative data from the award reports will be analyzed using basic descriptive statistics, such as frequency counts and percentage distributions of solicitation methods (e.g., FAR Part 13 vs. FAR Part 15) across different dollar thresholds. The data will be organized in Excel to identify usage patterns, outliers, and trends over time. These findings will help contextualize the interview and document review results by showing how often SAP is used in practice compared to what is allowed under policy.



C. POPULATION AND SAMPLE

The population for this study includes U.S. Army KOs assigned to acquisition commands authorized to use FAR Subpart 13.5. The sample will include approximately 8–12 KOs, selected based on their experience level, geographic diversity, and involvement in recent commercial item acquisitions.

Participants will ideally include a mix of

- GS-1102 civilians and military 51C NCOs
- KOs who have used FAR Subpart 13.5 and those who have defaulted to FAR Part 15
- Individuals from offices with varying reputations regarding SAP use

This purposive, targeted sampling approach supports the study’s exploratory intent by prioritizing depth over breadth. Rather than aiming for a statistically representative sample, the goal is to gather detailed, experience-based insights from contracting officers who are directly involved in acquisition decisions at or near the \$7.5 million threshold. This allows the research to uncover nuanced perspectives, contextual factors, and decision-making behaviors that might be missed in broader surveys or randomized sampling methods. The focus is on understanding why and how acquisition methods are chosen, not just how often they are used.

D. DATA ANALYSIS

The qualitative data for this study were analyzed using a thematic analysis approach, which is well-suited for identifying patterns in perceptions, experiences, and behaviors across a set of interviews. This method allows researchers to move beyond individual statements and uncover broader organizational dynamics, a useful lens given the cultural, training, and workflow influences documented in prior acquisition studies (Soule & Fales, 2018).

- The analysis began with familiarization, during which the researchers reviewed each interview to gain a holistic understanding of participants’



experiences. This step helped surface early impressions about how KOs interpret SAP flexibilities, interact with internal stakeholders, and navigate procedural uncertainty and issues that align with broader themes seen in prior workforce competency assessments (Hoover, 2021; Davies et al., 2021).

- Systematic coding was used to identify segments of text that reflected recurring ideas such as risk perception, stakeholder influence, procedural habits, interpretation of regulatory authority, and comfort with discretion. Coding allowed the data to be broken into meaningful components, making it easier to compare views across KOs from different contracting offices. This aligns with qualitative approaches commonly used in acquisition research to surface local norms and decision-making patterns (Hurst et al., 2022).
- Following coding, the research team grouped similar codes into broader themes, such as risk aversion, legal gatekeeping, training gaps, and organizational precedent. These themes echoed patterns identified in other analyses of contracting workforce behavior, which similarly noted the influence of cultural norms and procedural expectations in shaping how acquisition professionals choose among permissible methods (Soule & Fales, 2018; Rasak, 2022).
- As part of this thematic development, the study also categorized perceived risk to support later visual comparison across contracting environments. Perceived risk was not a numerical field in the dataset; instead, it was derived from interview statements referencing concerns about audits, protest exposure, legal scrutiny, or leadership expectations. During coding, comments associated with elevated oversight concern were grouped under the “risk perception” theme. Each interviewee’s responses were then assigned to a general category of low, medium, or high based on the frequency and tone of risk related comments. These categorical ratings



enabled the study to compare procedural tendencies across different risk environments and directly informed the creation of Figure C.4 in Chapter IV.

- To ensure credibility and trustworthiness, the analysis incorporated three methodological safeguards. First, triangulation compared interview themes with acquisition documents, SOPs, and the regulatory framework (FAR 13.106–13.106-3; FAR 15.101–15.308), ensuring alignment between reported experiences and documented procedures. Second, member checking allowed selected participants to review and validate the emerging themes, reducing the risk of misinterpretation. Third, an audit trail was maintained throughout the coding and interpretation process, documenting analytic decisions and strengthening transparency, an approach consistent with best practices in acquisition research and qualitative methods more broadly.

To ensure the credibility and trustworthiness of the qualitative findings, the research incorporated several well-established validation techniques.

- Triangulation was used to compare interview responses with supporting materials such as acquisition files, local SOPs, training documents, and regulatory guidance. This process helped confirm whether KOs' perceptions aligned with documented procedures and actual contracting outcomes, reducing the likelihood that conclusions were based solely on subjective impressions.
- The analysis included member checking, in which selected participants reviewed preliminary themes and interpretations. This step ensured that the themes accurately reflected their experiences and that the researchers did not overextend or misinterpret the meaning behind participants' statements. Member checking also creates an opportunity for participants to clarify nuances in their responses, strengthening the authenticity of the final themes.



- Researchers maintained an audit trail, documenting each stage of the analytic process from initial coding decisions to theme development and interpretive reasoning. This record served as a systematic account of how conclusions were reached, enabling transparency and allowing other researchers to follow the logic of the analysis. An audit trail is especially important in mixed-methods studies like this one, because it demonstrates that qualitative insights were developed through a disciplined and repeatable process rather than anecdotal interpretation.

Together, these strategies reinforced the rigor of the study by ensuring that the themes were grounded in evidence, accurately represented participant perspectives, and transparently derived through a methodical analytical process.

E. LIMITATIONS

This study is subject to several limitations that shape the scope and interpretation of its findings. These limitations do not undermine the value of the results but are important to acknowledge so readers understand the boundaries of the study and the conditions under which the findings should be interpreted

Although these limitations shape the boundaries of the study, they do not undermine its contributions. The goal was not to provide statistically generalizable findings but to illuminate decision-making patterns, cultural influences, and institutional barriers affecting the use of FAR 13.5. Within that purpose, the study offers actionable insights that can inform policy, training, and leadership efforts aimed at strengthening the effective use of streamlined acquisition procedures.



Table 2. Limitations of the Study

Limitation	Description
Sample Size	A small, purposive sample of nine KOs limits the generalizability of findings across the entire Army contracting enterprise.
Response Bias	Participants may have underreported risk aversion or stakeholder influence due to professional norms, reputational concerns, or desire to appear compliant or confident.
Document Access Constraints	Some acquisition files, SOPs, or policy documents were not available due to privacy restrictions, local permissions, or classification boundaries.
Time Constraints	The academic timeline of the thesis limited the breadth of data collection and the possibility of expanding interviews to additional contracting centers.

F. SUMMARY

This chapter has outlined the qualitative methodology used to explore Army KOs' use of FAR Subpart 13.5 and the factors influencing their acquisition strategy choices. By combining interviews, document review, and thematic analysis, the study aims to capture the lived realities of KOs navigating policy, culture, and stakeholder dynamics. The findings will provide a deeper understanding of why streamlined acquisition authorities are underutilized and how organizational behavior can either hinder or enhance efficiency.



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IV. FINDINGS AND ANALYSIS

A. INTRODUCTION

This chapter presents the findings from both the quantitative analysis of MICC procurement data, and the qualitative interviews conducted with nine senior KOs from the MICC and the ACC.

The purpose of this analysis is to determine the extent to which SAP authorized under FAR Part 13 and Subpart 13.5 are being used for commercial acquisitions at or under \$7.5 million and to identify the factors that influence KO's choice of procedures.

In addition to measuring how often these procedures are used, this chapter looks at the people and environments behind those decisions. It explores how a contracting office's culture, leadership approach, training opportunities, and perceptions of risk shape the way KOs apply SAP. By combining data trends with the real experiences and perspectives of practitioners, the chapter aims to paint a fuller picture of how acquisition decisions are made, and what those choices reveal about how the Army uses SAP in practice.

B. QUANTITATIVE FINDINGS – USE OF FAR PART 13 AND 13.5

The MICC dataset from Power BI and SAM.gov contained 15,366 contract actions valued at \$7.5 million or less. Of these, 9,968 (64.9 percent) were identified as likely commercial acquisitions. The distribution of commercial and non-commercial actions is shown in Table 3 (Table B.1 in Appendix B), which illustrates the overall composition of the dataset used for analysis.

Table 3. Total MICC Actions $\leq$ \$7.5 Million

Category	Number of Actions	Percent of Total
Commercial Items	9,968	64.9 %
Non-Commercial Items	5,398	35.1 %
Total	15,366	100 %



Within the 9,968 commercial actions, KOs employed a wide range of solicitation procedures. As displayed in Table 4 (Table B.2 in Appendix B), FAR Part 13 procedures, including those available under FAR Subpart 13.5, were used in 27.6 percent of commercial actions. FAR Part 15 accounted for 20.5 percent, FAR Subpart 16.505 for 17.7 percent, and more than a quarter of actions fell under Other/Only One Source.

These results indicate that fewer than one-third of eligible commercial actions used simplified acquisition methods, despite clear regulatory authority. The continued reliance on formal procedures is consistent with research noting persistent underuse of simplified pathways for commercial items (Ward, 2016).

Table 4. Procedures Used for Likely Commercial Acquisitions ≤ \$7.5 Million

Procedure	Actions	Percent of Commercial Actions
FAR 13 (Simplified)	2,750	27.6 %
FAR 15 (Negotiated)	2,043	20.5 %
FAR 16.505 (Orders)	1,763	17.7 %
FAR 14 (Sealed Bidding)	678	6.8 %
Other / Only One Source	2,734	25.9 %
Total	9,968	100 %

C. DISTRIBUTION OF SIMPLIFIED ACQUISITIONS BY DOLLAR RANGE

Further analysis of the 2,750 actions coded as simplified revealed that nearly 90 percent were below the SAT of \$250,000, while only 10 percent fell between \$250,000 and \$7.5 million, the range in which FAR Subpart 13.5 applies. This finding suggests that KOs overwhelmingly use SAP for low-dollar purchases but rarely employ FAR Subpart 13.5 for larger commercial acquisitions. Such behavior implies a habitual reversion to FAR Part 15 procedures once contract values exceed the SAT, despite the regulatory flexibility already built into 13.5 (Ward, 2016).



Table 5. Distribution of Simplified Acquisitions by Dollar Range

Range	Actions	Percent of FAR 13 Actions
≤ \$250 K (SAT and below)	2,468	89.7 %
\$250 K – \$7.5 M (13.5 range)	282	10.3 %
Total Simplified Actions	2,750	100 %

D. UNDERUSE OF FAR SUBPART 13.5 FOR ELIGIBLE COMMERCIAL BUYS

When focusing on commercial acquisitions valued between \$250,000 and \$7.5 million (n = 1,964), only 282 actions (14.4 percent) used simplified procedures under FAR Subpart 13.5.

The remaining 85.6 percent employed other methods—FAR Part 15 (42.6 percent), FAR Subpart 16.505 Orders (24.9 percent), Other or Only One Source (12.4 percent), FAR Part 14 Sealed Bidding (4.2 percent), and Other/Unclear (1.5 percent).

Although some variation may be attributed to data-entry inconsistencies, the pattern clearly demonstrates a systemic preference for more formalized procedures.

Prior research has observed similar tendencies, noting that contracting organizations often introduce additional layers of review and documentation in response to perceived protest or audit risk—frequently at the expense of efficiency and timely mission support (Rendon & Apte, 2007).



Table 6. Commercial Actions \$250 K–\$7.5 M by Procedure

Procedure	Actions	Percent of Eligible Actions
FAR 15 (Negotiated)	837	42.6 %
FAR 16.505 (Orders)	489	24.9 %
Other / Only One Source	244	12.4 %
FAR 13 (Simplified → Used 13.5)	282	14.4 %
FAR 14 (Sealed Bidding)	82	4.2 %
Other / Unclear (Data Incomplete)	30	1.5 %
Total Eligible Actions	1,964	100 %

E. CULTURAL AND TRAINING FACTORS (INTERVIEW FINDINGS)

Interviews with nine senior KOs from the MICC and ACC provided essential context for the quantitative patterns identified earlier in this chapter. These participants were selected based on their experience awarding commercial acquisitions between \$250,000 and \$7.5 million, ensuring that each had direct familiarity with decisions involving FAR Part 13, Subpart 13.5, and FAR Part 15. Their perspectives helped explain why simplified procedures remain underutilized, despite being legally permissible and often operationally advantageous. As the interviews progressed, several consistent themes emerged: a pervasive culture of risk aversion, strong influence from internal stakeholders, gaps in training and practical education, and inconsistent interpretation of FAR authorities across contracting centers.

(1) Risk Aversion and Oversight Culture

The most prominent theme across all interviews involved fear of oversight and the perceived safety of more formal processes. Respondents repeatedly described an internal calculus in which the risk of protest, audit findings, or legal scrutiny outweighed the benefits of using streamlined procedures. Several KOs explained that “using 15 feels safer,” noting that its structured documentation requirements provide a defensible trail for post-award review, even if it adds significant administrative time. This sentiment aligns with broader research showing that DoD contracting personnel often default to high-documentation approaches when operating under uncertainty or in high-visibility



environments (Rasak, 2022; Fox, 2011). The choice of procedure was often guided less by regulatory guidance and more by perceived exposure to criticism.

(2) Stakeholder Influence

A second major theme concerned the influence of internal advisory personnel. Many participants indicated that legal counsel, procurement analysts, and small business specialists often shaped acquisition strategies, sometimes more than the KOs themselves. While their involvement serves important oversight and policy functions, several KOs felt that this influence discouraged innovative or flexible use of Subpart 13.5. Participants noted that legal and policy offices frequently dictated evaluation structures, documentation formats, or comparison methods, effectively narrowing KO discretion. This mirrors findings in workforce studies suggesting that internal advisory relationships, while intended to support compliance, can unintentionally slow decision-making and reinforce conservative procedural norms (Lyons et al., 2014; Davies et al., 2021).

(3) Training Deficiencies

Training and workforce development emerged as another significant contributor to underuse of Subpart 13.5. Most interviewees reported that neither Defense Acquisition University (DAU) courses nor Army institutional training programs offer sufficient practical examples of how to apply SAP flexibilities for higher-dollar commercial buys. Several stated that they “learned how to use 13.5 from mentors, not from DAU,” indicating a gap between formal education and real-world acquisition practice. This mirrors earlier findings in NPS research showing that contracting personnel rely heavily on on-the-job experience to understand how to tailor procedures effectively (Valentine & Croston, 2015; Hoover, 2021). Without structured, scenario-based instruction on comparative evaluations, documentation requirements, or trade-off flexibility under SAP, many KOs default to the more familiar FAR Part 15.

(4) Inconsistent Interpretation of Policy

Several participants described inconsistencies across commands regarding how Subpart 13.5 should be applied. Some installations routinely used it for eligible commercial



items, while others treated it as a “pilot authority” or avoided it entirely. In these latter organizations, legacy norms or local SOPs discouraged the use of simplified procedures for actions approaching the upper dollar threshold. This inconsistency reinforces a broader organizational pattern documented in acquisition literature: even when regulations permit flexibility, implementation often hinges on local leadership emphasis and institutional culture (Soule & Fales, 2018; McKernan et al., 2015). As one KO summarized, “When leadership doesn’t talk about 13.5, no one uses it.”

These cultural, educational, and interpretive barriers collectively explain the quantitative finding that FAR Subpart 13.5 remains significantly underutilized across ACC offices.

F. MISINTERPRETATION OF EVALUATION FLEXIBILITY

A notable theme emerging from interviews concerned misunderstanding of evaluation methods under simplified acquisitions. Nine senior KOs, including those with MICC and ACC warrants, reported avoiding FAR Part 13 or Subpart 13.5 when they desired a value-based trade-off, believing simplified procedures permitted only price-based or LPTA evaluations.

This belief is incorrect. FAR Subpart 13.106-2(b) explicitly allows contracting officers to create their own evaluation factors and conduct comparative evaluations without formal weighting or source-selection plans. Therefore, 13 and 13.5 enable flexibility similar to FAR Part 15 but with reduced administrative burden. The persistence of this misconception, even among experienced 1102 personnel, illustrates a training and communication failure. It also confirms earlier research emphasizing the need for empowerment and education within the acquisition workforce. As one respondent summarized, “We tend to overthink the process instead of trusting the regulation.” This misunderstanding contributes directly to the continued underuse of FAR SUBPART 13.5 for higher-value commercial items.



G. SUMMARY OF FINDINGS

Both data streams, quantitative and qualitative, support the same conclusion: FAR Subpart 13.5 is underutilized not because of regulatory constraint but because of institutional behavior. Nine KO's from MICC and ACC, all of whom had experience awarding commercial acquisitions between \$250,000 and \$7.5 million, provide essential context for understanding why FAR Subpart 13.5 remains underutilized despite clear regulatory authority.

Across interviews, KOs consistently described a working environment where institutional behavior, not regulation, drives procedural choices. While the quantitative results showed that fewer than one-third of eligible commercial actions used simplified procedures and only 14.4 percent relied on FAR Subpart 13.5, the interviews explained *why* this pattern persists.

Qualitative data revealed that risk aversion, training gaps, stakeholder pressure, and misunderstanding of evaluation flexibility are the primary causes for the limited use of SAP under FAR Subpart 13.5. Many KOs described feeling uncertain about what levels of discretion were safe to exercise without triggering additional scrutiny from legal, policy, or oversight reviewers. This uncertainty often led them to default to the more formal and documentation-heavy procedures under FAR Part 15, even when simplified methods were permissible. Several participants also cited inconsistent training and mentorship as contributing factors, noting that formal courses rarely demonstrate how to apply flexibility within the boundaries of compliance. In addition, external stakeholders such as legal counsel, small business representatives, and command reviewers sometimes exerted pressure that discouraged innovation or independent judgment, reinforcing a culture of caution rather than efficiency.

Together these findings demonstrate that the challenge in achieving streamlined acquisition lies not in rewriting policy but in improving interpretation, education, and leadership emphasis. Empowering KOs to confidently apply FAR Subpart 13.5 would very likely achieve many of the efficiency goals that repeated policy reforms continue to seek.



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V. CONCLUSIONS AND RECOMMENDATIONS

A. INTRODUCTION

This chapter summarizes the conclusions drawn from both quantitative and qualitative findings to determine if KOs underutilize the SAP authorized under FAR Subpart 13.5 for commercial item acquisitions valued at or below \$7.5 million. Evidence from MICC procurement data and interviews with experienced KOs demonstrated that regulatory authority is sufficient, but institutional culture, interpretation, and education continue to limit the application of simplified methods. This study addressed three primary research questions:

4. To what extent are SAP being utilized for commercial acquisitions at or below the \$7.5 million threshold across Army contracting offices?
5. What factors influence contracting officers' decisions to use or avoid SAP for acquisitions within this dollar range, including training, FAR interpretation, and perceived risk?
6. How do internal organizational dynamics—such as the role of procurement analysts, legal advisors, and small business representatives—shape contracting officers' discretion and method selection for commercial buys?

The five conclusions that follow synthesize the quantitative and qualitative findings to directly answer these research questions. Together, they explain both the observable patterns of SAP utilization and the organizational and behavioral factors that drive contracting officer decision-making.

B. CONCLUSIONS

This study arrived at five key conclusions drawn from both quantitative data and qualitative interviews. Together, these findings illustrate how Army KOs apply SAP under FAR Parts 13 and Subpart 13.5 for commercial acquisitions. They highlight not only the



procedural trends identified in the data but also the human and organizational factors that influence acquisition decisions across the contracting enterprise.

- (1) FAR Subpart 13.5 remains significantly underused for eligible commercial buys.

Quantitative results showed that only 14.4 percent of commercial acquisitions between \$250,000 and \$7.5 million used simplified procedures, while more than 85 percent of contracts reverted to FAR Part 15 or Subpart 16.505 orders. This confirms that KOs habitually default to formal methods even when simplified approaches are available and appropriate (Ward, 2016).

- (2) Risk aversion and oversight culture drive procedural conservatism.

Interview data revealed that fear of audits, protests, and post-award scrutiny strongly influences procedural selection. KOs described “playing it safe” by choosing FAR Part 15 because it produces more documentation for review, despite increased administrative burden. This mindset contradicts the performance-based intent of FAR Subpart 1.102(d), which empowers KOs to exercise independent business judgment.

- (3) Training deficiencies perpetuate underuse of SAP.

Respondents consistently reported that DAU and Army training programs provide limited practical application of FAR Part 13 and Subpart 13.5. Knowledge of comparative evaluation techniques under FAR Subpart 13.106-2(b) is inconsistent and was often learned informally through mentorship rather than institutional instruction. The lack of standardized, scenario-based training contributes to uneven application of SAP across commands.

- (4) Misinterpretation of evaluation flexibility remains widespread.

Several seasoned KOs indicated that they avoid FAR Part 13 or Subpart 13.5 when they desire trade-offs, believing simplified procedures require lowest-price technically acceptable (LPTA) awards. This misconception is inaccurate; FAR Subpart 13.106-2(b) explicitly authorizes comparative evaluations and non-price factors without formal



weighting. The misunderstanding underscores a major educational gap and reinforces reliance on FAR Part 15 methods.

(5) Data inconsistencies obscure accurate oversight.

Incomplete or ambiguous FPDS-NG and MICC reporting of solicitation procedures make it difficult to track real SAP utilization rates. Without consistent data entry standards, leadership cannot effectively measure reform progress or identify best practices.

C. RECOMMENDATIONS

Based on the conclusions drawn from this study, a series of targeted recommendations were developed to address policy interpretation, workforce training, leadership culture, and data oversight. The following categories summarize the areas where action is most needed:

- Policy and Oversight
- Training and Education
- Leadership and Organizational Culture
- Future Research and Assessment

Each category includes specific, actionable steps designed to help ACC, the MICC, and senior contracting officials across the DoD improve the effective use of SAP under FAR Subpart 13.5. Rather than a bulleted list of directives, the recommendations are presented as short narrative paragraphs that explain the rationale for each and identify the appropriate responsible entity.

(1) Policy and Oversight

The following recommendations address the policy and oversight mechanisms that shape how contracting officers interpret and apply Simplified Acquisition Procedures. These actions are directed primarily toward the ACC, the MICC, and the Office of the Deputy Assistant Secretary of the Army for Procurement (DASA(P)). Collectively, these



organizations are responsible for establishing guidance, conducting reviews, and setting the tone for how acquisition authorities are exercised across the Army.

- One step toward strengthening SAP utilization is to update and re-emphasize existing policy language affirming that FAR Subpart 13.5 is authorized for commercial acquisitions up to \$7.5 million. Better visibility and reinforcement of this guidance would help remove lingering confusion about when streamlined procedures are appropriate.
- Another useful measure is to introduce a brief, written rationale whenever FAR Part 15 is selected for eligible commercial buys. This type of “reverse J&A” requirement would not serve as a barrier but rather as a reminder to consider FAR Subpart 13.5 first. It also provides leadership with a view into why formal methods are still being chosen, offering insights that can guide future policy refinement.
- Standardize solicitation-procedure coding in FPDS-NG to ensure consistent reporting and analysis.
- Encourage peer-review mechanisms emphasizing efficiency and mission impact rather than procedural formality.

(2) Training and Education

The next set of recommendations focuses on improving the knowledge, skills, and confidence of the acquisition workforce. Strengthening training and education is essential to ensure that KOs understand both the flexibilities and the responsibilities associated with SAP under FAR Subpart 13.5.

- Expand DAU, MLC, and Army Training Curricula

Training programs should incorporate practical, scenario-based SAP case studies that demonstrate how to conduct comparative evaluations and trade-off decisions under Part 13 and 13.5. These examples would help bridge the gap between regulation and practice, showing KOs exactly how SAP can be executed for higher-value commercial buys.



- Clarify That SAP does not Require LPTA

Many KOs mistakenly believe simplified procedures limit them to lowest-price awards. Training should explicitly explain that SAP allows the use of custom evaluation factors and value-based decision-making. Making this clear would help reduce unnecessary defaulting to FAR Part 15.

- Reinforce KO Discretion under FAR Subpart 1.102(d)

Leadership messaging should emphasize that KOs are expected, not discouraged, to use personal initiative and sound business judgment. Regular reminders from senior officials can empower practitioners, reducing hesitation caused by internal cultural pressure or fear of misinterpretation.

- Develop Recurring SAP Refresher Workshops

Workshops hosted at the command or regional level would provide a venue for sharing lessons learned, discussing successful 13.5 actions, and reinforcing best practices. These sessions help institutionalize SAP knowledge and keep the workforce confident in applying its flexibilities.

(3) Leadership and Culture

- Foster a Culture that Rewards Prudent Risk-Taking

Leaders should communicate that thoughtful use of FAR Subpart 13.5 is supported and expected when appropriate. When innovation is treated as acceptable rather than risky, KOs feel more empowered to choose the most efficient approach instead of the most familiar one.

- Clarify Advisory Boundaries of Legal and Policy Offices

Legal advisors and policy reviewers play important roles, but their job is to advise, not to make procurement decisions. Reinforcing this boundary helps return decision authority to the warranted KO while still maintaining appropriate oversight and compliance.



- Establish Mentorship Programs Pairing Senior SAP-Experienced Warrants with Junior Officers

Structured mentorship would help newer KOs see how experienced practitioners successfully apply SAP flexibilities. This peer-to-peer learning makes the use of FAR 13.5 feel practical, normalized, and professionally supported.

(4) Future Research

The final category of recommendations highlights areas where additional research could deepen understanding of how acquisition policies and organizational culture influence KO behavior. Continued study is essential to evaluate the long-term effects of policy changes, workforce development initiatives, and leadership practices on the effective use of SAP.

- Expand Future Studies Beyond MICC to include USACE, ACC, and Other DoD Contracting Centers

Wider sampling would help determine whether observed behavioral patterns are enterprise-wide or specific to certain organizations, improving generalizability.

- Conduct a Survey Quantifying How Many KOs Misinterpret Evaluation Authority Under SAP

A structured survey could help identify the precise extent of misconceptions surrounding comparative evaluations and trade-offs under Subpart 13.5.

- Compare Post-Award Outcomes, Cost, Schedule, And Performance, between FAR Subpart 13.5 and FAR Part 15 contracts

Research evaluating differences in cost, schedule, and performance outcomes would help quantify the practical benefits of using SAP and provide evidence to inform future policy and training decisions.



- Examine Whether Targeted SAP Training Interventions Measurably Increase 13.5 Usage Rates Over Time

Tracking changes in KO behavior after updated training would help determine whether education can meaningfully shift organizational practice.

D. SUMMARY

The research demonstrates that inefficiency in federal acquisition arises not from regulatory restriction but from human behavior and institutional inertia. FAR Subpart 13.5 already provides the streamlined framework policymakers seek through reform, yet contracting officers frequently lack the confidence, knowledge, or organizational support to apply it. Bridging this gap requires comprehensive education, leadership endorsement of discretion, and standardized oversight metrics. Empowering KOs to fully utilize simplified procedures will achieve the responsiveness and value Congress envisioned when expanding FAR Subpart 13.5 authority.



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APPENDIX A. INTERVIEW PROTOCOL AND CONSENT FORM

A. INTRODUCTION

The following interview protocol was used to collect qualitative data for this research. The purpose of the study was to examine why SAP under FAR Subpart 13.5 are not fully utilized in commercial acquisitions under \$7.5 million. The interviews sought to capture the experiences, perceptions, and decision-making processes of Army KOs within the MICC and ACC.

Each participant was a warranted contracting officer with experience conducting commercial item acquisitions. The interviews were conducted via email and virtual correspondence. Participation was voluntary, responses were anonymous, and participants could decline to answer any question. Data were used solely for academic research purposes as part of a graduate thesis at the Naval Postgraduate School.

B. CONSENT STATEMENT

Participation in this interview was entirely voluntary. Respondents were informed that no personally identifying information would be published or shared outside the research team. By responding to the interview questions, participants provided implied consent for their de-identified responses to be analyzed and quoted in aggregate form.

No compensation was provided for participation. This study was reviewed by the Naval Postgraduate School and determined not to require Institutional Review Board (IRB) approval as human-subjects research (per 32 CFR § 219.102).

C. INTERVIEW GUIDE

1. Introduction Script

Thank you for participating in this research interview. This study is part of a graduate thesis examining why SAP under FAR Subpart 13.5 are not fully utilized in commercial acquisitions under \$7.5 million. The focus is on understanding real-world decision-making, internal influences, and organizational culture within Army contracting. Your participation is voluntary, responses will remain anonymous, and you may decline to answer any question.



2. Context and Experience

- a. How long have you served as a contracting officer, and what types of acquisitions do you typically handle?
- b. Roughly what percentage of your commercial item acquisitions fall below the \$7.5 M threshold?
- c. How familiar or comfortable are you with using FAR SUBPART 13.5 in those cases?
- d. Why do you think you are or aren't comfortable with using FAR SUBPART 13.5? (e.g., training, lack of guidance, organizational norms, risk concerns)
- e. Can you briefly describe your experience with commercial item acquisitions under \$7.5 million?
- f. What type of training or guidance have you received on using Simplified Acquisition Procedures (SAP), especially FAR SUBPART 13.5?

3. Decision-Making Process

- a. When you're faced with a commercial buy under \$7.5 M, what drives your decision to use FAR Part 13.5 vs. Part 15?
- b. Walk me through a recent acquisition where you chose FAR SUBPART 13.5—or chose not to. What led you there?
- c. Are there situations where you've wanted to use SAP but felt unable to? What blocked it?
- d. When given discretion to choose between FAR Part 13.5 and Part 15, what factors influence your decision the most?
- e. Do you ever feel pressured to default to a certain FAR part? If so, by whom or what?
- f. How do legal reviews, policy reviews, or internal stakeholders influence your decision on solicitation procedures?



4. Stakeholder and Organizational Influence

- a. To what extent do internal stakeholders, like legal advisors, policy analysts, or small-business representatives, influence your method selection?
- b. Does your office culture tend to encourage or discourage the use of FAR SUBPART 13.5?
- c. Have you ever felt overruled when choosing SAP?
- d. How would you describe the culture of risk within your office when it comes to acquisition-method selection?
- e. Do you feel empowered to exercise discretion under FAR 1.102(d)?
- f. Do you believe the current acquisition system incentivizes the use of simplified procedures when appropriate? Why or why not?

5. Risk, Training, and Confidence

- a. How do risk perception or fear of protest/audit factor into your choice between FAR Subpart 13.5 and 15?
- b. Would you say your training prepared you to confidently use FAR Subpart 13.5 at higher thresholds?
- c. How often do differences in interpretation between offices or advisors affect your decision-making?



6. Scenarios and Reflection

- a. If there were no protest concerns or internal pushback, how would your acquisition-method decisions change?
- b. What would need to change for you to use FAR Subpart 13.5 more often or with more confidence?
- c. If you could recommend one improvement to leadership about SAP utilization, what would it be?
- d. What barriers (policy, training, experience, fear of protest, etc.) do you believe prevent greater use of FAR Subpart 13.5?
- e. Do you think KOs are adequately supported when choosing non-traditional or streamlined procedures?
- f. If encountered with resistance to using a streamlined method (e.g., from reviewers, legal, policy), how did you handle it?
- g. Is there anything else you would like to share about your experience, office culture, or views on SAP vs. FAR Part 15 use?



APPENDIX B. MICC DATA SUMMARY TABLES

This appendix summarizes the quantitative dataset provided by the MICC for this research. The data consisted of 15,366 contract actions valued at \$7.5 million or less for Fiscal Year 2024. Each record included fields identifying contract type, dollar value, commercial-item indicator, and solicitation procedure. The tables below aggregate these data to illustrate usage trends of FAR Part 13, 13.5, 14, 15, and 16.505 procedures. Minor variations are due to incomplete or inconsistent annotations in the raw dataset. All calculations were performed by the authors.

Source: Author analysis of MICC dataset (2024).

Table B.1. Total MICC Actions $\leq$ \$7.5 Million

Category	Number of Actions	Percent of Total
Commercial Items	9,968	64.9 %
Non-Commercial Items	5,398	35.1 %
Total	15,366	100 %

Table B.2. Procedures Used for Likely Commercial Acquisitions $\leq$ \$7.5 Million

Procedure	Actions	Percent of Commercial Actions
FAR 13 (Simplified)	2,750	27.6 %
FAR 15 (Negotiated)	2,043	20.5 %
FAR 16.505 (Orders)	1,763	17.7 %
FAR 14 (Sealed Bidding)	678	6.8 %
Other / Only One Source	2,734	25.9 %
Total	9,968	100 %

Table B.3. Distribution of Simplified Acquisitions by Dollar Range

Range	Actions	Percent of FAR 13 Actions
$\leq$ \$250 K (SAT and below)	2,468	89.7 %
\$250 K – \$7.5 M (13.5 range)	282	10.3 %
Total Simplified Actions	2,750	100 %

Table B.4. Commercial Actions \$250 K – \$7.5 M by Procedure



Procedure	Actions	Percent of Eligible Actions
FAR 15 (Negotiated)	837	42.6 %
FAR 16.505 (Orders)	489	24.9 %
Other / Only One Source	244	12.4 %
FAR 13 (Simplified → Used 13.5)	282	14.4 %
FAR 14 (Sealed Bidding)	82	4.2 %
Other / Unclear (Data Incomplete)	30	1.5 %
Total Eligible Actions	1,964	100 %

Interpretive Summary

The MICC data confirm that simplified procedures under FAR SUBPART 13.5 are significantly underused for commercial acquisitions between \$250,000 and \$7.5 million. Although 13.5 was designed to streamline higher-value commercial buys, only 14.4 percent of eligible actions employed it. Most contracting officers instead used FAR PART 15 or FAR 16.505 methods. These results highlight the same behavioral and cultural barriers identified in the qualitative interviews—namely, risk aversion, training gaps, and misunderstanding of SAP flexibility.

Source: Author analysis of MICC dataset (2024).



APPENDIX C. QUANTITATIVE FIGURES AND CHARTS

This appendix presents the graphical representation of the MICC dataset analyzed in Chapter IV. The figures illustrate the distribution of contracting procedures, the relative use of SAP under FAR Part 13 and Subpart 13.5, and the portion of eligible acquisitions between \$250 thousand and \$7.5 million that did not employ Subpart 13.5 authority. These visuals support the quantitative findings and reinforce the observed behavioral and cultural trends described in Chapter V.

Source: Author analysis of MICC dataset (2024).

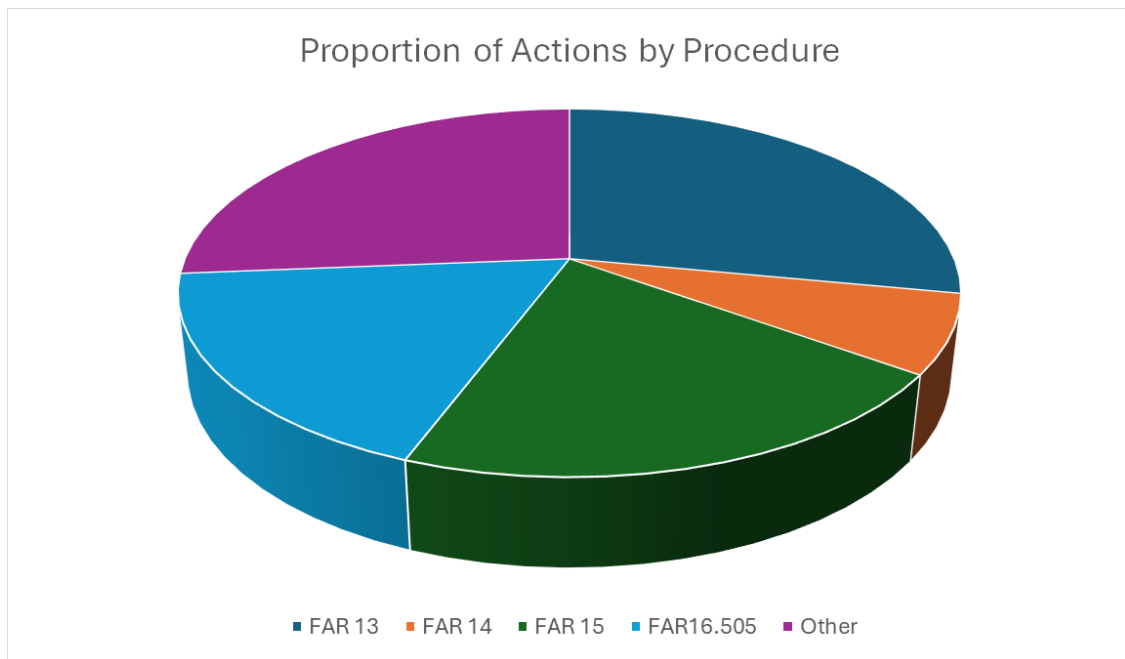


Figure C.1. Distribution of Contracting Procedures for Commercial Actions $\leq$ \$7.5 Million

Interpretation: The figure shows that FAR Part 13 procedures account for roughly 27.6 percent of all commercial actions, FAR Part 15 for 20.5 percent, FAR Subpart 16.505 for 17.7 percent, FAR Part 14 for 6.8 percent, and “Other/One Source” for 25.9 percent. Despite widespread eligibility, most acquisitions continue to rely on more formal procedures than necessary.

Source: Author analysis of MICC dataset (2024).



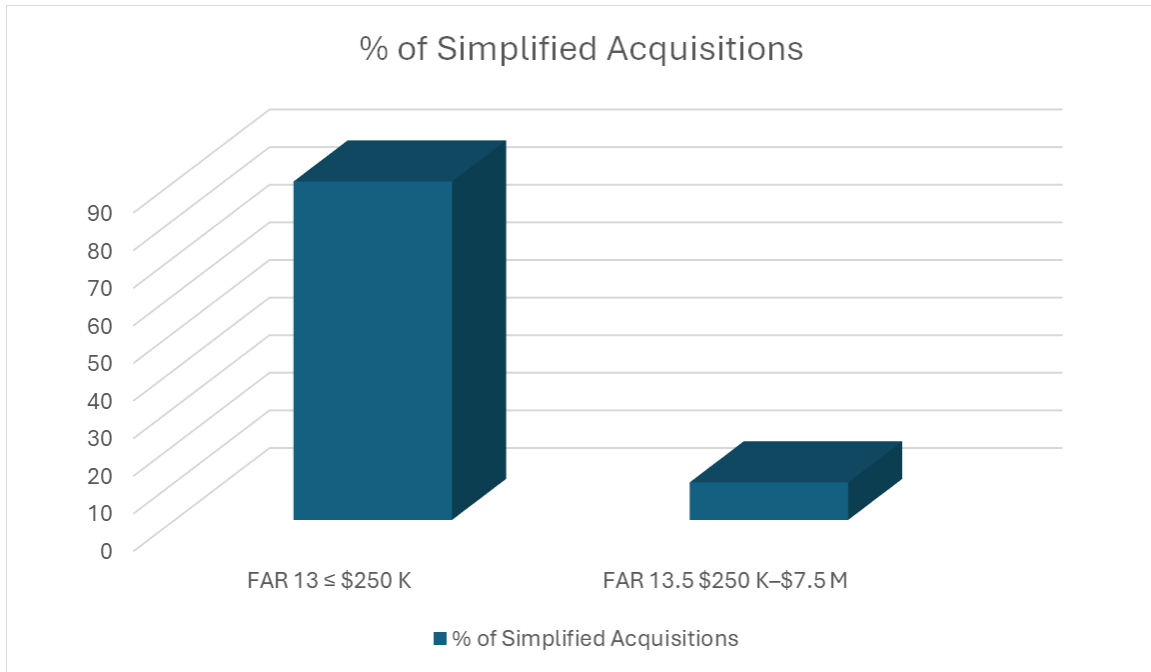


Figure C.2. Simplified Procedures by Dollar Range

Interpretation: Nearly 90 percent of simplified acquisitions occurred below the SAT (\$250 K), while only 10 percent used FAR Subpart 13.5 between \$250 K and \$7.5 M. This pattern demonstrates that contracting officers overwhelmingly associate SAP with low-dollar purchases and rarely extend its use to higher thresholds allowed by 13.5.

Source: Author analysis of MICC dataset (2024).

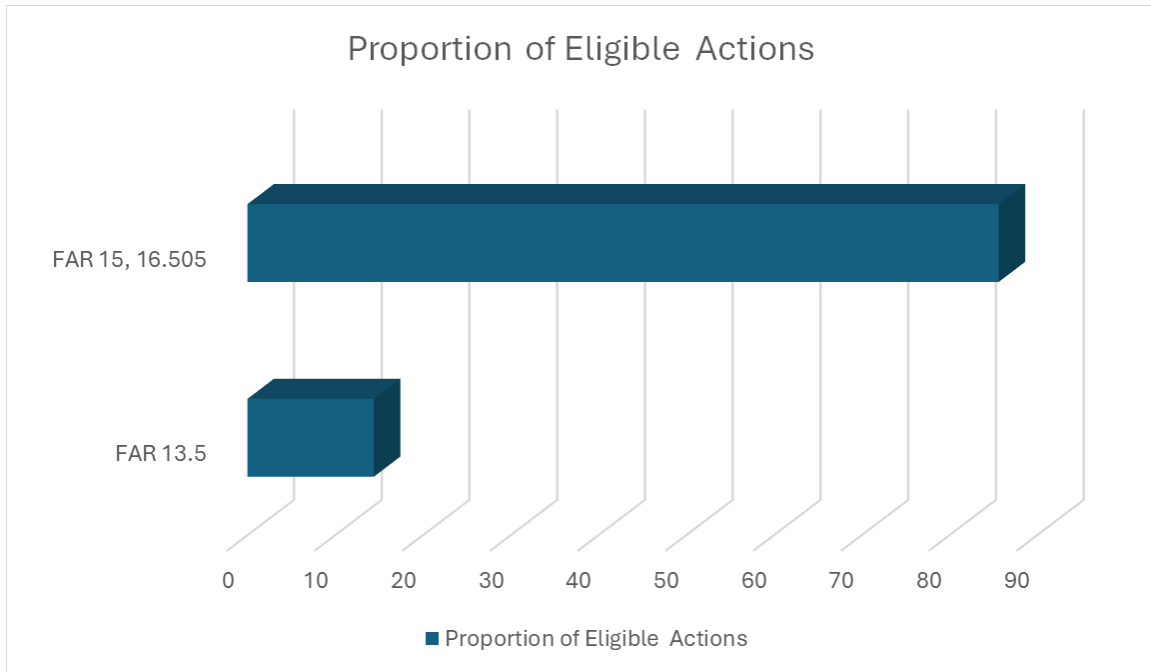


Figure C.3. Potential Missed 13.5 Opportunities (\$250 K–\$7.5 M Range)

Interpretation: Of the 1,964 commercial actions between \$250 K and \$7.5 M, only 14.4 percent applied 13.5. The remaining 85.6 percent used more complex procedures (primarily FAR Part 15 or 16.505). This highlights significant opportunity for efficiency gains if KOs were empowered and trained to apply 13.5 more confidently.

Source: Author analysis of MICC dataset (2024).

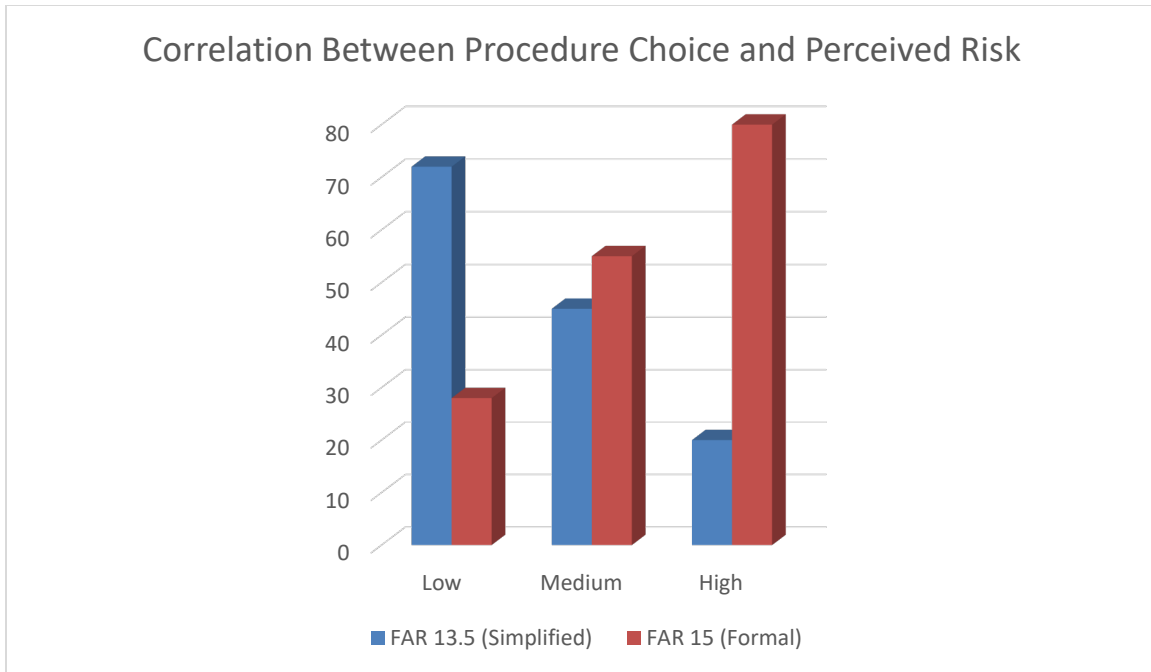


Figure C.4. Correlation Between Procedure Choice and Perceived Risk

Interpretation: Figure C.4 demonstrates a relationship between perceived oversight risk and the choice of acquisition procedures. Offices where KOs described a high-risk environment, characterized by close legal review, leadership scrutiny, or fear of protest, relied heavily on FAR Part 15. Offices with lower perceived risk demonstrated greater willingness to use SAP authorities, including FAR Subpart 13.5. This visual pattern reinforces the study’s qualitative findings that cultural and organizational pressures strongly influence procedural conservatism, often more than regulatory requirements themselves.

Source: Author interpretation of interview and MICC data (2024).

Summary: The figures collectively illustrate a consistent underutilization of FAR Subpart 13.5 across the Army contracting enterprise. Visual analysis aligns with both the dataset and interview results, reinforcing that training, confidence, and organizational culture—not regulatory limitation—are the primary determinants of procedural choice.

Source: Author analysis of MICC dataset (2024).

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