Recommendation 59: Revise the Defense Acquisition Workforce Improvement Act to focus more on building professional qualifications.

Problem
Provisions in DAWIA are intended to professionalize the DoD AWF by establishing specific requirements for education, training, and experience. After nearly 30 years, DoD is still attempting to use a certification structure that includes a greater emphasis on experience and ensuring AWF members attain necessary qualifications to fulfill their responsibilities. A current problem is that DoD’s certification programs create a sense among the AWF that professional development occurs in a finite period at the beginning of members’ careers rather than being a continuing process. Congress and DoD should revise DAWIA to focus on building a professional AWF qualified to tackle the challenges of the 21st century and beyond. Such a refocus would comprise substantiating qualifications and a modernization of the certification process.

Background
Congress enacted DAWIA (Chapter 87 of Title 10 U.S. Code) on November 5, 1990 to provide a foundation for the AWF management framework. In Chapter 87, DAWIA charges the Secretary of Defense with responsibility for establishing education, training, and experience requirements for personnel serving in acquisition positions. It also charges the Secretary with establishing requirements for continuing education and a certification process. The Office of the Under Secretary of Defense for Acquisition and Sustainment’s Human Capital Initiatives (HCI) Office is responsible for executing DoD-wide AWF governance, strategies, policies, programs, and talent management initiatives.

“The content of DAWIA has evolved since its initial implementation in the early 1990s, but the intent remains the same—the recruitment, development, and retention of a professional, educated, and experienced workforce.” DoD uses a certification process to determine whether an employee meets the required education, training, and experience standards for an acquisition career field.

DoD has made improvements in developing a certification process that serves as a model for federal civilian agency acquisition programs as well as industry but has made less progress in identifying and addressing employees’ job skill gaps. Former Undersecretary of Defense for Acquisition, Technology, Management Policies, 10 U.S.C. § 1701. Management Policies, 10 U.S.C. § 1701.


Ibid.


and Logistics Frank Kendall highlighted this issue in the Better Buying Power 2.0 objective to increase professional qualification requirements for all acquisition specialties and DoD addressed it by launching the Acquisition Workforce Qualification Initiative (AWQI) employment development tool in May 2013.  

**Discussion**

The Section 809 Panel interviewed DoD acquisition executives and members, acquisition career managers, AWF subject matter experts (SMEs), civilian agency experts and industry experts. The panel also reviewed DoD AWF certification standards listed in the Defense Acquisition University (DAU) catalog, various Office of Federal Procurement Policy (OFPP) memoranda, Government Accountability Office (GAO) reports, and other acquisition career-field-related literature.

**DAWIA**

In 1990, Congress required DoD to establish a management and career development structure with specific education, training, experience, and other qualification requirements for the AWF. The structure included (a) contracting officer qualification requirements, (b) acquisition corps membership selection and eligibility requirements, (c) program and deputy program manager assignment and other qualification requirements, and (d) requirements for acquisition personnel assigned to Critical Acquisition Positions (CAPs).

Since DAWIA enactment, DoD substantially increased DAWIA certification rates (see Figure 5-1). DoD has also improved education levels of DoD AWF members and the training capacity of DAU.

---

9 Data obtained during Section 809 Panel interviews with DoD senior leaders, August 2018.
Figure 5-1. Defense Acquisition Workforce Certification Rates\textsuperscript{12}

* Source: Adapted from DAU graphic.

\textbf{Education}

Congress specified educational requirements for each acquisition career field in DAWIA to professionalize the AWF. Specifically, the law requires contracting officers and DoD acquisition corps members to have a baccalaureate degree from an accredited educational institution and have completed at least 24 semester credit hours in various disciplines.\textsuperscript{13} The Office of Personnel Management (OPM) implemented governmentwide qualification requirements for acquisition occupations in accordance with DAWIA.\textsuperscript{14} DoD implemented DAWIA so that only five career fields require formal education as a prerequisite for an employee to be hired:

- The \textit{auditing} and \textit{contracting} career fields require 24 semester credit hours in accounting or business disciplines, in addition to their baccalaureate degree prerequisites.

- The \textit{engineering} and \textit{science and technology manager} career fields require baccalaureate degrees in various technical and engineering disciplines.

- The \textit{test and evaluation} career field requires an associate’s degree in any discipline as a prerequisite.


\textsuperscript{13} Contracting positions: qualification requirements, 10 U.S.C. § 1724 and Selection criteria and procedures, 10 U.S.C. § 1732.

The *international acquisition* career field educational requirements are permitted to be specified by the career field.

DoD does not specify any formal education for the other nine AWF career fields.\(^{15}\)

Although the educational requirements have helped DoD professionalize the DoD AWF, they also limit the ability to hire individuals who do not meet the requirements. The case study below provides an example of how the current DAWIA educational requirements restricts the ability for DoD to hire a talented individual interested in public service.

---

### Case Study:
**Individual’s Federal Hiring Experience**

**PROBLEM:** An individual the Section 809 Panel interviewed explained that she graduated from college with a baccalaureate degree in political science that included 12 semester hours of business credits. She hoped to enter the government as a DoD contracting intern but did not meet the DAWIA minimum education requirements and could not be hired without obtaining the additional business credits the law requires. She encountered three challenges in her experience looking to be hired as an 1102 in DoD:

**Requirement to Have 24 Semester Hours:** For DoD 1102 positions, minimum education requirements are a baccalaureate degree AND 24 semester hours of business credits. This differs from OPM’s 1102 requirements that require either a baccalaureate degree OR 24 semester hours of business credits. The interviewee explored the possibility of obtaining the additional 12 semester hours that she needed by going to a local community college. This solution would cost more than $2,000 and would take almost a year to complete the training if she took the courses during the summer or as a part-time student.

**Hiring Process:** The interviewee further encountered a frustrating experience navigating her way around the USAJobs website. For example, one position for which she wanted to apply was open for an entire year, all grades, and all locations. She contacted the point of contact listed on the job announcement for more information and was told there was no information available about whether a position is actually open and mentioned that some of these postings are online so offices can collect resumes in case hiring needs come up later. She sought assistance from individuals who were more experienced with the federal hiring process and was advised the following:

- If a job posting was open for a short period of time (1–2 weeks), it was likely there was an actual position that needed to be filled.
- On the submitted resume, applicants should mark themselves as *highly qualified* in all criteria for the application package to pass through the algorithm to a human reviewer.
- Job postings may say they are *open to the public* when actually, the hiring manager wants to hire internally but must post the position publicly because of human resources requirements to do so.
- It can take 6 months to 1 year to get hired and on-boarded.
- The best way to get hired is for applicants to know someone who can push their resume to the top.

**Limited Opportunities for Nonrecent Graduates:** Through her research, she learned about the Pathways Program for entry-level 1102s, but Pathways is only open to recent college graduates. Because she graduated in 2015, she was ineligible.

**CONCLUSION:** The interviewee was faced with two choices: (a) Pay $2,000 to obtain the additional business credits, delaying her ability to apply for positions until at least Sept 2018, and then potentially wait a year to get hired or (b) Seek...

---

Case Study:
Individual’s Federal Hiring Experience

employment outside of DoD. She chose the latter, applied for a position outside the federal government, and was hired within 2 months. She currently works in an entry-level contracting position for a major defense contractor.

Training

As required by DAWIA, the Secretary of Defense established DAU to develop and deliver the core acquisition training required for DAWIA certifications, continuous learning courses, assignment-specific courses, and executive-level development training. One major challenge DAU faced from its inception was an “overwhelming backlog of training requirements it has created. The number of people attempting to sign up for required courses and for newly created courses threatened to overwhelm DAU’s capability.” DoD addressed the backlog in two ways:

- Allowing some students to meet their training requirements by receiving credit for previous experience through a process called fulfillment.
- Developing distance learning courses that allow students to receive immediate training at a reduced cost and with minimum interference with their work schedules.

Today, DAU continues its distance-learning program via online acquisition resources, job support tools, and on-the-job assistance to acquisition organizations and teams. DoD’s efforts to increase DAU’s training capacity and enhance DAU training contributed toward improved workforce certification levels. Notwithstanding DAU’s efforts to increase training capacity, DoD officials told the Section 809 Panel that they desire a better balance among the three elements (diamonds) of DAU’s acquisition learning model, which is designed to deliver learning that enhances performance at the precise time it is needed.

The three diamonds model (Figure 5-2) consists of foundational learning (structured training courses, continuous learning modules, and policy updates), workflow learning (online courses/webinars), and performance learning (multifunctional team training). As DAU’s training model has evolved, it has become clear that the workforce’s and DAU’s focus on certification and knowledge needs to shift toward a focus on behavioral change and building workplace leadership confidence and competence.

---

18 Ibid.
20 Ibid, 18.
21 Data obtained during Section 809 Panel interviews with DoD senior leaders, August 2018.
Senior acquisition leaders indicated DoD should consider reducing some content included in foundational certification courses and instead offer this content later in employees’ careers when it will actually improve their capabilities. The current construct drives overspending due to training atrophy, meaning by the time employees actually need the training for successful performance in their position, they have forgotten it because the training occurred too far in advance of the need. A related problem is that today’s functional integrated product team focuses on a broad range of competency elements. This situation leads to a focus on making sure someone—often someone with shallow knowledge—is assigned to all of the functional roles, at the expense of ensuring AWF members build confident expertise. To compound the problem, AWF members have a difficult time getting refresher training because DAU, due to training capacity limitations, prioritizes foundational training for employees working toward a certification over advanced employees who need to refresh their knowledge.

Virtually all of acquisition is a team activity involving multiple functional players, yet in preparing AWF members to do their jobs, DoD relies almost exclusively on individual skills training, especially for certification. This approach varies greatly from proven performance models in virtually every other military mission area or corporate/commercial learning design for which new entrants first learn individual skills, then learn how to apply those skills in concert with other teammates in small teams, then the small teams learn how to integrate their capabilities either in support of other teams, or how to coordinate support from other teams and functions, and so on.

**Experience**

The DoD Acquisition Workforce Strategic Plan sets a goal of prioritizing experiential learning through rotational assignments and exchange programs, yet so far it has focused more on workforce shaping and relied on certification training completion as a measure of success with regard to DAWIA.

---


23 Data obtained during Section 809 Panel interview with DoD senior leaders, July–August 2018.

lacks metrics to measure improving workforce proficiency and capability.\textsuperscript{25} DoD senior leaders indicated that certification means nothing without an understanding of true capabilities. Some believe employees are over-trained, they are completing certifications they may never need, and DoD should balance certification training with getting real work done. Interviewees agreed that experience is the greatest contributor through which employees become qualified in their chosen career field.

According to psychologist K. Anders Ericsson and author Malcolm Gladwell, one must accrue 10,000 hours of practice to become a master of anything.\textsuperscript{26} Under the current construct, interns and new AWF employees are fully certified and considered experts in their field by merely remaining employed in a DoD acquisition organization for 4 years, along with the education and training for certification, without having to demonstrate that they have mastered the proficiencies of an expert acquisition professional. Certification Level III should indicate AWF members have achieved initial readiness, not certified expertise.

AWQI is a positive step for ensuring employees are qualified in addition to being certified, but AWQI is a voluntary program, and organizations within DoD have been slow to embrace it. The major obstacle seems to be that AWQI is complex and requires a substantial time commitment from employees and their supervisors but does not show them an obvious benefit for devoting the time to use it.

\textbf{Continuous Learning}

Once employees achieve certification to a certain level, they never have to recertify, even though the knowledge base of regulations, technology, and best practices applicable to acquisition grows every year. Instead, DoD requires certified AWF members to accumulate 80 continuous learning points (CLPs) within a 2-year training cycle to maintain certifications. Creditable activities include academic courses, training courses, professional activities such as obtaining professional licenses or teaching, and experiential learning such as rotational assignments or participating in exchange programs. The point credit for each activity is set forth on the DAU website.\textsuperscript{27} Continuous learning activities are largely self-directed by employees, with some involvement by immediate supervisors (e.g., a sign-off on an employee’s individual development plan (IDP)), but little strategic guidance from the enterprise on competencies desired for the future.

DoD officials offered mixed reviews of this approach to maintaining certification. Some indicated 80 CLPs was reasonable, but criteria should be factored into the continuous learning requirement so that employees are incentivized to take training or participate in activities that will improve their performance or prepare them for future job opportunities. One official pointed out that DoD’s self-imposed criteria sometimes misses the mark by allowing AWF members to be trained in areas that they do not need in their current positions because it is easy for them to take training courses available through DAU.\textsuperscript{28} A better, less used alternative, would be for employees to fulfill continuous learning

\textsuperscript{25} Data obtained during Section 809 Panel interviews with DoD senior leaders. August 2018.
\textsuperscript{27} “Continuous Learning Center, Point Credit,” Defense Acquisition University, accessed August 28, 2018, https://www.dau.mil/training/clc/p/Point-Credit.
\textsuperscript{28} Data obtained during Section 809 Panel interviews with DoD senior leaders, August 2018.
requirements by actively seeking training from other education providers (e.g., local community colleges, commercial training providers) that addresses knowledge gaps. CLPs should be used to maintain certification by focusing on competencies needed for current and future positions.

Specialties and Leadership

DAU worked with functional leaders to establish a set of Core Plus courses for each career field and each DAWIA certification level. Employees and their supervisors can use the DAU Core Plus Development Guide to identify training beyond certification requirements that allows employees to specialize in a specific acquisition area and may be beneficial to employees’ career development or performance in a particular assignment. Officials indicated they like the idea of Core Plus specialization and that it is a step in the direction of better training focused on the competencies required for the position and could result in a more capable workforce that delivers improved acquisition outcomes.

DAU is also making inroads with regard to leadership development training. It offers five courses that embed leadership development within some Level II certification but primarily Level III certification courses across all acquisition career fields. It also promotes employee participation in leadership and management courses such as the Harvard Business School for Continuous Learning credit as a means of maintaining their certification after acquiring Level III certification. Further, DAU established a Leadership Learning Center of Excellence (LLCOE) “to increase awareness of the importance of leadership to successful acquisition outcomes.” The LLCOE offers a combination of courses and executive coaching to develop future leaders. In September 2018, DAU began piloting an Acquisition Leader Development (ALD) series of seven integrated programs delivered through a combination of on-line, classroom, and workplace experiences. The initial ALD program targets early-career professionals and the subsequent programs will be available as professionals move through their career.

DoD-unique Certification

Both the government AWF and industry recognize the DAWIA construct as a well-developed certification program. It serves as a model for federal civilian agencies’ acquisition workforce and industry. However there are no universal certification standards.

31 Data obtained during Section 809 Panel interviews with DoD senior leaders, August 2018.
34 Data obtained during Section 809 Panel interviews with DoD senior leaders, August 2018.
Bryan Herlick, Ph.D., Discipline-Specific Certifications (SE, T&E, MGT): Can they serve as surrogates for DAWIA Qualifications in the DoD
The exclusivity associated with DAWIA certification has some unintended, negative consequences. DoD-unique standards use DoD-unique terminology that is not widely accepted. Project management, for example, is different than DoD science and technology and acquisition governance. DAU has conglomered the two concepts, which has rendered the associated training unnecessarily complex, focusing on policy at the expense of building solid program management or systems engineering skills.

The intent of DAWIA was to professionalize the DoD AWF; however, a certification program unique to DoD presents problems. For example, AWF members may have difficulty communicating with industry due to use of DoD-unique terminology, and DoD employees may not understand the language of business, business activity, or motives, and the realities of how the private sector operates. This situation can result in insufficiently developed requirements and suboptimally negotiated contracts. Standards that support a common foundation for communication and collaboration in both government (including DoD) and industry would render workforce members more effective. It is important to recognize economics and market forces are key differences in dealing with firms that offer defense-unique products as compared to firms that offer commercial products.

DoD’s unique certification program makes it difficult, and sometimes impossible, to hire quality employees when they do not comply with DAWIA requirements but are otherwise qualified and desirable to do the job. “No rules are so good that there should not be some mechanism to allow unusual people to enter the acquisition work force.” DoD’s implementation of DAWIA does not give hiring managers enough flexibility in choosing the right person for a job.

Leveraging commercial certification programs would help DoD overcome the unintended consequences created by adopting a DoD-unique certification process. The certification programs must be based on nationally or internationally recognized standards, not those that simply offer a certificate upon completion of training. In implementing this shift in certification focus, it is important to recognize what learning content commercial certification programs address, and what learning content will need to be addressed in DoD-provided training as truly DoD-unique.

**Conclusions**

Current implementation of DAWIA in DoD policy has succeeded in its goal of supporting professionalism of its AWF. DoD’s robust AWF management framework promotes education, training, and experience that, on completion, allows personnel serving in acquisition positions to be certified at various levels. DoD’s implementation of DAWIA falls short, however, by making

---

36 Management policies, 10 U.S.C. §1701.
37 Data obtained during Section 809 Panel interview with industry leaders, August 2018.
39 Dr. Robert B. Costello, former Under Secretary of Defense (Acquisition), testimony before the Investigations Subcommittee of the Committee on Armed Services House of Representatives (Hearing Record), March 28 and April 24, 1990, 163-10.
certification the goal and not linking certification to *occupational qualifications* that AWF members can demonstrate on the job.

As DoD continues to reform its AWF policies, it can improve the capabilities of the AWF by abandoning the three-level certification structure and instead addressing employee development through two processes:

- Modernizing the existing certification process to emphasize professional skills that are transferable across the AWF and industry by relying more on *professional certifications* based on nationally or internationally recognized standards.

- Preparing employees to perform better in their current jobs and for future positions by adding *occupational qualifications* or demonstrated competencies to an employee’s job series for defense acquisition-specific skills.

The three-level certification structure burdens DoD with mandatory training requirements that, although important, do not align with employees’ learning needs as they progress through their careers. The layers of DAU training are often not timed to employee job needs and unnecessarily drive DAU resources to focus on basic foundational training that can be gained in many other ways.

Additionally, the three-level structure provides a false sense of assurance that AWF members are job-ready without any consideration of their proficiency. A second-order effect of this flaw is DoD uses the AWF certification system as selection criteria for filling positions. Thus, it is possible that a level-three-certified applicant for a position with little or no proven job experience would be more likely to be considered to fill a position than an experienced applicant who is not level-three certified.

*Professional certification* should be to industry- and governmentwide standards. Examples of such practice would be certified public accountants (CPAs) or professional engineers for which accepted standards fundamental to the profession exist, and they do not vary whether practitioners are in industry or government. Training related to these certifications is sanctioned by the professional community through independent validation processes. Adoption of a professional standards model would permit DAU to shift its training focus and resources to offer employees experiences that fit their precise needs as they flow through various jobs in their careers. DAU would also need to focus on the defense-unique buying context because it would not be content addressed in industry certification programs. It is vital that AWF members understand the similarities and differences in economic and market forces for defense-unique and commercial markets and how DoD policies and processes address those differences.

**Amend DAWIA to Require Professional Certification**

*Professional certification* is defined as the process by which an AWF member participates in a program that offers a combination of education, training, or experiences based on third-party accredited, nationally or internationally recognized standards. Third-party accreditation adds credibility to the standard.

DoD should require *professional certification* as part of DAWIA when such a program exists for a particular career path. Introducing *professional certification* as an element of the DAWIA process will
help to avoid the unintended consequences created by the current DoD-unique certification construct. Requiring a *professional certification* would allow DoD and industry to work from a common body of knowledge, improve communication and collaboration between government and industry, increase the applicant pool, and raise the professionalism of the DoD AWF to meet national or international standards.

Once DoD AWF members acquired *professional certification*, they would rely on the certifying organization’s process for maintaining certification. That could involve recertifying by means of retesting or continuous learning.

Amending DAWIA to require *professional certification* also would provide an opportunity for DoD AWF members to acquire their training and testing for certification and continuous learning from local academic institutions or other accredited education providers in the commercial marketplace. This approach could help reduce costs associated with employees being sent to DAU training courses. Additionally, costs associated with employees’ professional certification could be covered by DoD through redirection of certain training funds.

If a third-party accredited program based on nationally or internationally recognized standards does not exist for a particular DoD AWF career field the certification requirement would not simply disappear. Instead, DoD would be responsible for creating its own certification program for that particular career field using whatever institutions or resources were deemed appropriate. DoD would need to determine the best approach to satisfying the certification requirement and ensuring that it conforms with the practices of national accrediting bodies such as ISO. The professional certification program should focus on validating employees’ attainment of the fundamental knowledge and skills needed for them to be successful across a career continuum.

In a modernized implementation of DAWIA, professional certification would no longer be the goal for AWF members but would instead be a baseline used to demonstrate AWF members’ understanding of acquisition subject matter. Beyond professional certification, AWF members would also need to demonstrate they are capable of performing acquisition-specific skills in their current or future positions to be considered qualified—the new goal. Adopting industry-/governmentwide professional certifications similar to the CPA profession as a baseline is not a substitute for the training and development responsibility that DoD and other federal agencies bear for the lifetime learning needed by their workforces.

**Amend DAWIA to Eliminate the Mandated 24 Semester-Hour Prerequisite**

DAWIA has succeeded in professionalizing the DoD AWF. The number of DoD AWF members with baccalaureate and advance degrees has steadily increased.\(^{41}\) Having specific credit requirements in statute may hinder hiring managers’ ability to choose the right person for a job.

DoD should be allowed to determine for itself if specific credit requirements should be applied to any particular DoD AWF career fields. Eliminating the statutory mandate would not preclude DoD from

---

instituting its own educational requirements if it chose to do so. DoD would have the flexibility to make that determination for the acquisition workforce based on its own evaluation, rather than a congressional directive. This flexibility would allow DoD to become more agile in hiring candidates with backgrounds and education that no one imagined when DAWIA passed, such as data analysis, cyber security, supply chain management, or artificial intelligence, including fields that may emerge as important skills for a future AWF.

**Implementation**

**Legislative Branch**

  - Require DoD to implement an AWF professional certification program based on third-party accredited, nationally or internationally recognized standards for each DoD acquisition career field.
  - If a third-party accredited, nationally or internationally recognized certification program does not exist for a DoD acquisition career field, require DoD to establish a certification program using the best approach determined by the Secretary of Defense for meeting the requirement including implementation through entities outside DoD.
  - Eliminate the requirement for contracting officers to have completed at least 24 semester credit hours (or the equivalent) of study in the specified areas.
  - Eliminate the requirement for contracting officers to have completed at least 24 semester credit hours (or the equivalent) of study in the specified areas.

**Executive Branch**

- There are no regulatory changes required for this recommendation.

**Implications for Other Agencies**

- If Congress agrees to statutorily mandate DoD AWF members to acquire *professional certifications*, then the Section 809 Panel recommends Congress also extend the mandate to the federal civilian AWF and provide adequate funding to accommodate such a program. DoD and civilian agencies share an applicant pool. Extending the mandate to all federal civilian AWF members would raise the professionalism of the entire federal AWF, giving hiring managers added assurance they are hiring quality employees, regardless of whether applicants come to them from inside or outside their own agency.