

Measuring PALT

Written by Nick Sanders
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When reporting on the 2018 NDAA, [Section 886](#) seems to have escaped our attention. That Section required SECDEF “to develop, make available for public comment, and finalize a definition of the term “Procurement Administrative Lead Time” or ‘PALT’, to be applied Department of Defense-wide, that describes the amount of time from the date on which a solicitation is issued to the date of an initial award of a contract or task order of the Department of Defense...” In addition, SECDEF must devise a plan “for measuring and publicly reporting data on PALT for Department of Defense contracts and task orders above the micro-purchase threshold.”

As readers know, we have castigated the FAR Councils—and the DAR Council in particular—for a lack of urgency in responding to Congressional mandates issued through prior NDAAAs. No such lack of urgency can be found in the Council’s haste to implement Section 886. Indeed, on February 9, 2018, a request for public comment was published in the [Federal Register](#).

According to the Federal Register notice, “DoD is proposing to define PALT as ‘the time between the date on which the initial solicitation for a contract or task order of the Department of Defense is issued and the date of the award of the contract or task order.’” Further, “The Department plans to submit a Change Control Board request to the General Services Administration to update FPDS-NG by adding a new data field that reflects when the solicitation for a contract or task order valued above the simplified acquisition threshold is issued. Once the FPDS-NG system is updated (estimated to be completed in fiscal year 2019), the public will be able to utilize FPDS-NG to obtain the PALT information for any contract or task order issued by the DoD that is valued above the simplified acquisition threshold.”

The public was invited to submit comments on the proposal above, citing DARS-2018-005.

Though, to be candid, we wonder what comments could be submitted. After all, Congress defined PALT and the proposed definition is exactly—verbatim—what Congress told the policy-makers it should be. We suppose one could comment on the plan to modify FPDS-NG, but that seems a bit silly. It’s as good a plan as any, given that PALT, as defined by Congress, is a silly thing to measure.

It’s all well and good to measure how long it takes DoD to award a contract or task order, but

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that measurement misses how long it takes DoD to develop an acquisition plan and to conduct appropriate market research in support of that plan. It's like measuring how long it takes Domino's to deliver your pizza by measuring from the time the delivery person leaves the store—ignoring how long it takes to make the pizza and cook it.

Whatever.

If you want to comment on PALT, feel free. Just remember that the definition is statutory and the DAR Council cannot change it.

PALT.

We're measuring PALT now.

Whatever.