United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240

JAN 04 2010

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Department of the Interior Acquisition Policy Release (DIAPR) 2010-06

Subject: Ensuring Accurate Procurement Data Reporting to the Federal Procurement Data System-Next Generation

References: Federal Acquisition Regulation (FAR) Subpart 4.6, *Contract Reporting*;
DIAPR 2002-04 and Amendments 1 and 2, *Reporting Charge Card Transactions in the Interior Procurement Data System*; and
DIAPR 2004-07, *Ensuring Accurate Procurement Data Reporting to the FPDS-NG*

1. Purpose:

This policy release is issued to update certification requirements for bureau submissions to the Federal Procurement Data System-Next Generation (FPDS-NG) in order to ensure the timeliness and accuracy of data entry.

2. Effective Date: Effective immediately upon issuance.

3. Expiration Date:

This DIAPR supersedes DIAPR 2008-8, *Ensuring Accurate Procurement Data Reporting to the Federal Procurement Data System-Next Generation;* and the June 27, 2008, memorandum *Federal Procurement Data Verification and Validation*; and remains in effect until canceled or superseded.

4. Background and Explanation:

FAR Subpart 4.6 requires agencies to report all procurement actions that exceed the micro-purchase threshold and all modifications to those transactions, regardless of dollar value, to FPDS-NG. Additionally, as a participant in the Small Business Competitiveness Demonstration Program, the Department of the Interior (DOI) is required to report all actions, regardless of dollar value, made in the designated industry groups.

The following actions are NOT currently reported to FPDS-NG:

- Financial assistance actions; e.g., grants, cooperative agreements, subsidies, contributions, and P.L 93-638 actions.

- Imprest fund transactions, SF-44 purchases, and training authorizations. Purchase card transactions with a total cumulative value less than the micro-purchase threshold are not required to be reported, but an agency may elect to do so.

- Interagency agreements with other Federal agencies (e.g., Tennessee Valley Authority, GPO transactions), independent Federal establishments (e.g., Export/Import Bank of the United States), or federally chartered sources (e.g., Howard University or the Smithsonian Institution).

- Government Bills of Lading and Government Transportation Requests.

- Actions using predominantly non-appropriated funds.

- FED STRIP and MILSTRIP requisitions.

- Actions involving transfer of supplies within and among agencies and sub-agencies.

- Orders from GSA Stock and GSA Consolidated Purchase Program (e.g., GSA Advantage).

- Actions for petroleum or petroleum products ordered against a Defense Logistics Agency Indefinite Delivery Contract.

It is imperative that data submissions to the FPDS-NG be timely and correct for many reasons. The Federal Funding Accountability and Transparency Act (FFATA) was signed on September 26, 2006. One requirement of FFATA is that Federal contract data be made available to the public via a single, searchable website. FPDS-NG data is forwarded to this website (www.usaspending.gov) on a daily basis. Data from the FPDS-NG is used by the White House, Congress, the Government Accountability Office, other Federal Executive agencies, the general public, the Small Business Administration (SBA) to calculate agency goals, and DOI managers, as a basis for decisions on a variety of topics. Further, OMB Circular A-123, *Management's Responsibility for Internal Control*, mandates implementation of internal controls to ensure, among other objectives, that reliable, complete, and timely data are maintained.

5. <u>Actions Required</u>:

Data Entry

(1) All procurement actions that have the potential to exceed the micro-purchase threshold, including those made with the Government purchase card, must be entered into FPDS-NG. All procurement actions that fall under the Small Business Competitiveness Demonstration Program must be reported to FPDS-NG regardless of dollar value.

(2) Data must be entered into FPDS-NG and confirmed for accuracy as close to real time as possible. When an action is submitted from a contract writing system, it must be confirmed for accuracy prior to its release for award; otherwise, entry, review, and approval must be accomplished no later than three days after the procurement action has been signed.

(3) Contract actions must be entered into FPDS-NG by a responsible Contracting Officer, Contract Specialist or Purchasing Agent, who has been fully trained in procurement and

subjects involved in the reporting process and is able to efficiently and accurately determine the correct response to all data elements.

(4) Each action entered into FPDS-NG must be reviewed and approved by the Contracting Officer who signed the procurement action. Corrections to and deletions of FPDS-NG actions must be made by the administering Contracting Officer. The following exceptions apply:

- Changes and/or deletions that cannot be made by the administering Contracting Officer and require intervention by FPDS-NG support. In this case, the bureau FPDS-NG administrator must contact the DOI FPDS-NG administrator to identify any issues where they feel this applies. If appropriate, the DOI FPDS-NG administrator will request assistance from FPDS-NG Support.

- When a unique circumstance exists making paragraph (4) above impractical; e.g., mass corrections, and a waiver has been obtained from the DOI FPDS-NG administrator.

(5) Reporting and reviewing personnel must pay particular attention to the accuracy of each and every data element, especially the business size status and socioeconomic information, such as Service-Disabled Veteran-Owned businesses, which should be derived from a review of the vendor's On-line Representations and Certifications application. Correct entry of all dates, dollar amounts, selection of the appropriate PSC and NAICS codes, Contracting Officer's size determination, and project descriptions that clearly explain what is being procured, are other examples of focus areas.

Procurement Data Quality Control Plan

(1) Each bureau shall establish a procurement data quality control plan involving, at a minimum, the following:

- Identification of the bureau FPDS-NG system administrator. This individual will serve as a liaison between the Office of Acquisition and Property Management (PAM) and the bureau FPDS-NG users.

- The means by which the bureau intends to capture any unique FPDS-NG reporting requirements of non-DOI entities.

- The corrective actions the bureau will implement in response to persistent inaccurate, late, and/or non-existent reporting.

- How individuals will be held accountable for data accuracy. Bureaus must demonstrate that there will be real consequences for persistent inaccurate, late, and/or non-existent reporting. Bureau Procurement Chiefs, managers, supervisors, and Contracting Officers must all be held equally accountable.

- The bureau's review process at each level of the organization. For example:

- The Contracting Officer responsible for signing the contract ensures that an FPDS-NG record has been created for the action and that all the information is accurate and matches the contract file. This review must take place prior to obligation of the action.
- The manager/supervisor for the contracting activity reviews the standard reports available in FPDS-NG no less than bi-weekly to ensure all procurement actions that have the potential of a cumulative total exceeding the micro-purchase threshold have a corresponding FPDS-NG entry that is accurate and complete.
- At each succeeding supervisory/management level, data is reviewed and certifications that all applicable data is entered into FPDS-NG and is accurate are provided.
- Standard report data is periodically reviewed for common errors/miscoding so that targeted training/clarification can be provided.

(2) Bureau procurement data quality control plans must be reviewed, updated, and submitted to PAM within one month of this policy's issuance date. It must also be reviewed, updated, and submitted to PAM annually no later than October 30. Procurement data quality control plans must be signed by the Bureau Procurement Chief.

Review and Certification

Using current OMB guidelines, PAM will provide each bureau with a projected FPDS-NG contract action report sample size. The projected sample size will be provided to the bureaus no later than November 1 of each year and must be used by bureaus to plan their upcoming quarterly and annual reviews.

Quarterly Reviews and Certifications

(1) Each bureau must perform quarterly reviews of its FPDS-NG data.

(2) All data elements for each FPDS-NG action must be validated against the associated contract file.

(3) The review of an FPDS-NG action report must not be conducted by the approving Contracting Officer or other individual who prepared the action.

(4) Using the sample size projection for the applicable quarter, each bureau will select a sample of its actions that proportionally reflects the types of actions (e.g., Purchase Order, Definitive Contract) entered into FPDS-NG during that quarter. The bureau will then identify for each type of action, the actions with the highest obligation amount. Contracting office, region, or other criteria shall not be used to determine the make-up of the bureau's sample.

(5) The review of each action must be documented and a detailed Quarterly Reviewed Actions Report must be submitted to PAM with the Bureau Procurement Chiefs quarterly certification document. The report shall include for each action reviewed, at a minimum:

- Agency;
- Office;
- PIID;
- Modification Number;
- Referenced IDV PIID;
- Type of Action;
- Obligation Amount;
- Created by User;
- Reviewer;
- Date Reviewed, and
- The FPDS-NG key data elements specified in Exhibit 1, Attachment C.

(6) The report must indicate if any errors found within these data elements were caused by the user, FPDS-NG, or whether there were other contributing factors (e.g., CCR). A description of the error(s) found, corrective action(s) taken, and projected date for corrective action must also be included.

(7) Elements that are initially found to be incorrect during a quarterly review must be reported as such, and must never be changed to "correct." Data elements that cannot be validated must be considered incorrect. This includes data elements that match data in the contract file that the reviewer determines to be incorrect.

(8) When action reviews have been completed and documented, an overall accuracy rate and accuracy rates for each of the FPDS-NG key data elements must be calculated in accordance with Exhibit 1 (Attachment B), and documented on the Accuracy Rates form at Exhibit 1 (Attachment C).

Each Bureau Procurement Chief must certify the completeness, currency, and accuracy of FPDS-NG data by completing and submitting the quarterly certification document found at Exhibit 1 to the Director, PAM, no later than 15 days after the end of each quarter. The Quarterly Reviewed Actions Report and completed Quarterly Data Element Accuracy Rate's form must be included with the quarterly certification as attachments. The certification must confirm that all applicable actions were approved by the responsible Contracting Officer and are accurate. The certification must also confirm that the bureau procurement data quality control plan was followed. The certification must further quantify and explain:

- Any known errors or unresolved anomalies remaining in the data;
- Goals for the current fiscal year; and
- Steps being taken to further improve the quality (completeness and accuracy) as well as the timeliness of the data.

Annual Review and Certification

(1) Each bureau shall review its Quarterly Reviewed Actions Reports to verify that all entries are accurate, outstanding corrective actions have been completed, incorrect entries identified within key data elements were identified correctly as system, user, or other; and a description

of the error(s) found and corrective action(s) taken have been included. After this review the quarterly reports must be consolidated into one Annual Reviewed Actions Report and submitted to PAM with the Bureau Procurement Chiefs annual certification.

(2) Elements that were found to be incorrect during quarterly reviews must be reported as such on the Annual Reviewed Actions Report, even if the action has since been corrected.

(3) After the data included in the Quarterly Reviewed Actions Report has been verified and consolidated into the Annual Reviewed Actions Report, annual data element accuracy rates must be calculated in accordance with Exhibit 2 (Attachment B), and documented on the Accuracy Rates form at Exhibit 2 (Attachment C).

(4) Each Bureau Procurement Chief must certify the completeness, currency, and accuracy of FPDS-NG data by completing and submitting the annual certification document found at Exhibit 2 to the Director, PAM, no later than October 15. The Annual Reviewed Actions Report and completed Annual Data Element Accuracy Rate's form must be included with the annual certification as attachments. The certification must confirm that all applicable actions were approved by the responsible Contracting Officer and are accurate. The certification must also confirm that the bureau procurement data quality control plan was followed. The certification must further quantify and explain:

- Any known errors or unresolved anomalies remaining in the data;
- Goals for the current fiscal year; and
- Steps being taken to further improve the quality (completeness and accuracy) as well as the timeliness of the data.

6. <u>Additional Information</u>:

Questions about this DIAPR may be directed to Chip DiMuzio, DOI FPDS-NG Administrator, at (202) 219-0771, or via e-mail at Chip_L_Dimuzio@ios.doi.gov.

Debra E. Sonderman
Director, Office of Acquisition and Property Management
and Senior Procurement Executive

Attachments

SUBJECT: Quarterly Certification of Procurement Data Submissions to FPDS-NG

Bureau/Organization Name: _____

2. **Date of Submission Certification:** I certify that _____% of all reportable contract actions awarded during **FY** ____, **Quarter #** ____ for my bureau/organization have been entered into FPDS-NG as fully and accurately as reasonably possible as of the date of my signature. Bureaus unable to certify entry of 100% of their reportable contract actions must discuss the reasons for this, and their plans to remedy this situation in Section 5 of this Certification.

3. **Substantiation of Certification:** Given the importance of data accuracy for purposes of running all Federal Reports, what have you done to substantiate your certification? (Answer a - d)

a. Collected certifications from subordinate offices.	☐ YES	☐ NO
b. Through statistically correct processes, compared FPDS data to data in the corresponding contract files.	☐ YES	☐ NO
c. Other V&V actions taken for FY '08 (Provide in format of Attachment A)	☐ YES	☐ NO
d. Data accuracy rates provided in format of Attachment C.	☐ YES	☐ NO.

4. **Data Submission Method**: Check the data submission method(s) used by your department/agency:

a. Contract Writing System (CWS)	☐ YES	% _____	☐ NO
b. Web Portal (On-line login)	☐ YES	% _____	☐ NO
c. Other	☐ YES	% _____	☐ NO

If "Yes" for 4.a., please name Contract Writing System(s) used: _____

If "Yes" for 4.c., please describe the "Other" method(s) used: _____

5. **Explanation of Data Missing from Certification**: Use additional pages as necessary to discuss any procurement data that are not included in this certification. Please identify data belonging to organizations that have been unable to enter their data into FPDS as well as CWS data and "draft" FPDS records that have not passed the FPDS data validation routines. For each category of missing FPDS records, indicate the number, dollar value, and age of the missing records and your milestone plans for bringing these records into FPDS.

6. **General Comments (Include on an added page if needed)**:

7. **Have you submitted a FPDS Data quality control plan?**

☐ Yes ☐ No

Is your FPDS data quality control plan up to date?

☐ Yes ☐ No

9. **If all of your bureau's procurement actions have been reported in FPDS-NG, how many contracting actions did you report last quarter, and what is the total dollars obligated for these actions? If not, how many have been reported, how many remain to be reported, and what is the total dollars obligated for each?**

   Total Actions: _____

   Total Dollars Obligated: _____

10. **Did you review the number of actions shown for this quarter in the sample size document provided to you by the Office of Acquisition and Property Management?**

    ☐ Yes ☐ No

11. **How many of your procurement actions entered last quarter did you review, and what is the total dollars obligated for these actions? (Please attach your Quarterly Reviewed Actions Report)**

    Total Actions Reviewed: _____

    Total Dollars Obligated (Reviewed Actions): _____

12. _____
    BUREAU PROCUREMENT CHIEF NAME (Printed)

13. _____ _____
    BUREAU PROCUREMENT CHIEF SIGNATURE **Date**

Bureau Name: _____

Fiscal Year, and Quarter of FPDS Data: _____

Quarterly Results of Statistically Valid Comparison of FPDS Data and Contract Files

Please summarize the results collected into this Attachment and Attachment C. Please also discuss any systemic causes of invalid data in as much detail as you can, with particular attention to errors caused by FPDS or any other components of the Integrated Acquisition Environment. Use additional pages as needed.

Guidance for Making Statistically Valid Comparison of FPDS Data and Contract Files

. his attachment provides guidance on how bureaus are expected to conduct statistically valid comparisons of their FPDS data and the underlying contract files. This guidance also includes definitions of key terms, e.g., Overall Accuracy Rate.

Overall Accuracy Rate – The percent of all the FPDS data elements sampled which were determined to be correct, i.e., they matched the corresponding data in the contract files and the data in the contract files were correct. For purposes of this report, only compute the overall data accuracy for the data elements reported on Exhibit 2. Do not include in this computation the accuracy of other data elements the bureau might choose to validate for its own purposes.

Data Element Accuracy Rate – The percentage of entries for each selected data element in the sampled contract action records that were determined to be correct, i.e., the entry matched the corresponding data in the contract file and the data in the contract file was correct. Only data elements appropriate for the type of record being validated should be counted in computing the accuracy rate; e.g., only count the accuracy of the Reason for Modification element in modification records. Data elements that have been optional in FPDS should be validated as though they had been required. Therefore, data elements should only be blank if they do not apply to that record type. Data elements that apply to the type of record being reviewed must not be blank and must be supported by information present in the contract file or contract writing system.

Total Sample Size – This is the total number of FPDS contract action records selected by all subordinate reporting activities for comparison to the corresponding contract files.

Percent of Total Procurement Spend Covered by Sample – This is computed by dividing the total obligations associated with the contract action records sampled by the total obligations associated with all contract actions.

Bureau Name: _____

iscal Year and Quarter of FPDS Data: _____ **Overall Accuracy Rate:** _____%

Quarterly Accuracy Rates for Key Data Elements **Systemic Causes of Invalid Data**
(please check all that apply)

Data Element Name	Accuracy Rate (%)	User	FPDS	Other
1A Procurement Identifier				
1C Referenced IDV ID				
2A Date Signed				
2C Completion Date				
2D Est. Ultimate Completion Date				
2E Last Date to Order				
3A Base and All Options Value				
3B Base and Exercised Options Value				
3C Action Obligation				
4C Funding Agency ID				
4F Funded by Foreign Entity				
5B Who Can Use				
5D Fee for Use of Service				
5J Fee Paid for Use of IDV				
6A Type of Contract				
6F Performance Based Service Acquisition				
6M Description of Requirement				
7A Clinger Cohen Act				
7B Walsh-Healy Act				
C Service Contract Act				
/D Davis Bacon Act				
8A Product/Service Code				
8G Principal NAICS Code				
8K Use of EPA Designated Products				
8L Use of Recovered Material				
8N Bundled Contract				
9A DUNS No				
9C Principal Place of Performance Code				
9H Place of Manufacture				
9K Place of Performance ZIP Code(+4)				
10A Extent Competed				
10C Reason Not Competed				
10N Type of Set Aside				
10P Evaluated Preference				
10R Statutory Exception to Fair Opportunity				
11A CO's Business Size Selection				
11B Subcontract Plan				
12A IDV Type				
12B Award Type				
12C Reason for Modification (if 12D = M)				
13N 8(a) Program Participant				
13O HUB Zone Firm				
3P Small Disadvantaged Business				
.3U Woman Owned Business				
13V Veteran Owned Business				
13W Service-Related DVOB				

SUBJECT: Annual Certification of Procurement Data Submissions to FPDS-NG

Bureau/Organization Name: _____

2. **Date of Submission Certification:** I certify that _____% of all reportable contract actions awarded during **FY** ____, for my bureau/organization have been entered into FPDS-NG as fully and accurately as reasonably possible as of the date of my signature. Bureaus unable to certify entry of 100% of their reportable contract actions must discuss the reasons for this, and their plans to remedy this situation in Section 5 of this Certification.

3. **Substantiation of Certification:** Given the importance of data accuracy for purposes of running all Federal Reports, what have you done to substantiate your certification? (Answer a - d)

a. Collected certifications from subordinate offices.	☐ YES	☐ NO
b. Through statistically correct processes, compared FPDS data to data in the corresponding contract files.	☐ YES	☐ NO
c. Other V&V actions taken for FY ____ (Provide in format of Attachment A)	☐ YES	☐ NO
d. Data accuracy rates provided in format of Attachment C.	☐ YES	☐ NO.

4. **Data Submission Method**: Check the data submission method(s) used by your department/agency:

a. Contract Writing System (CWS)	☐ YES	% _____	☐ NO
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c. Other	☐ YES	% _____	☐ NO

If "Yes" for 4.a., please name Contract Writing System(s) used: _____

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☐ Yes ☐ No

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   Total Actions: _____

   Total Dollars Obligated: _____

10. **Did you review the number of actions shown for this FY in the sample size document provided to you by the Office of Acquisition and Property Management?**

    ☐ Yes ☐ No

11. **How many of your procurement actions entered this FY did you review, and what is the total dollars obligated for these actions? (Please attach your Annual Reviewed Actions Report)**

    Total Actions Reviewed: _____

    Total Dollars Obligated (Reviewed Actions): _____

12. _____
    BUREAU PROCUREMENT CHIEF NAME (Printed)

13. _____ _____
    BUREAU PROCUREMENT CHIEF SIGNATURE **Date**

Exhibit 2
Attachment A

Bureau Name: _____

. iscal Year of FPDS Data: _____

Annual Results of Statistically Valid Comparison of FPDS Data and Contract Files

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Data Element Accuracy Rate – The percentage of entries for each selected data element in the sampled contract action records that were determined to be correct, i.e., the entry matched the corresponding data in the contract file and the data in the contract file was correct. Only data elements appropriate for the type of record being validated should be counted in computing the accuracy rate; e.g., only count the accuracy of the Reason for Modification element in modification records. Data elements that have been optional in FPDS should be validated as though they had been required. Therefore, data elements should only be blank if they do not apply to that record type. Data elements that apply to the type of record being reviewed must not be blank and must be supported by information present in the contract file or contract writing system.

Total Sample Size – This is the total number of FPDS contract action records selected by all subordinate reporting activities for comparison to the corresponding contract files.

Percent of Total Procurement Spend Covered by Sample – This is computed by dividing the total obligations associated with the contract action records sampled by the total obligations associated with all contract actions.

Exhibit 2
Attachment C

Bureau Name: _____

iscal Year of FPDS Data: _____ **Overall Accuracy Rate:** _____%

Annual Accuracy Rates for Key Data Elements **Systemic Causes of Invalid Data**

(please check all that apply)

Data Element Name	Accuracy Rate (%)	User	FPDS	Other
1A Procurement Identifier				
1C Referenced IDV ID				
2A Date Signed				
2C Completion Date				
2D Est. Ultimate Completion Date				
2E Last Date to Order				
3A Base and All Options Value				
3B Base and Exercised Options Value				
3C Action Obligation				
4C Funding Agency ID				
4F Funded by Foreign Entity				
5B Who Can Use				
5D Fee for Use of Service				
5J Fee Paid for Use of IDV				
6A Type of Contract				
6F Performance Based Service Acquisition				
6M Description of Requirement				
7A Clinger Cohen Act				
7B Walsh-Healy Act				
C Service Contract Act				
/D Davis Bacon Act				
8A Product/Service Code				
8G Principal NAICS Code				
8K Use of EPA Designated Products				
8L Use of Recovered Material				
8N Bundled Contract				
9A DUNS No				
9C Principal Place of Performance Code				
9H Place of Manufacture				
9K Place of Performance ZIP Code(+4)				
10A Extent Competed				
10C Reason Not Competed				
10N Type of Set Aside				
10P Evaluated Preference				
10R Statutory Exception to Fair Opportunity				
11A CO's Business Size Selection				
11B Subcontract Plan				
12A IDV Type				
12B Award Type				
12C Reason for Modification (if 12D = M)				
13N 8(a) Program Participant				
13O HUBZone Firm				
3P Small Disadvantaged Business				
3U Woman Owned Business				
13V Veteran Owned Business				
13W Service-Related DVOB				