



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240

August 6, 2013

Department of the Interior Acquisition Policy Release (DIAPR) 2013 - 05

Subject: Ensuring Accurate Procurement Data Reporting to the Federal Procurement Data System (FPDS)

Reference: Federal Acquisition Regulation (FAR) Subpart 4.6, *Contract Reporting*, and May 31, 2011 OFPP Memorandum, *Improving Federal Procurement Data Quality - Guidance for Annual Verification and Validation*

1. **Purpose:** The purpose of this DIAPR is to update certification requirements for bureau submissions to the FPDS in order to ensure the timeliness and accuracy of data entry.

2. **Effective Date:** Effective immediately upon issuance.

3. **Expiration:** This DIAPR supersedes DIAPR 2008-8, *Ensuring Accurate Procurement Data Reporting to the Federal Procurement Data System-Next Generation* (the FPDS); and remains in effect until canceled or superseded.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 the FPDS.

In addition to the actions listed in FAR Subpart 4.606(c), the following actions should **NOT** be reported to the FPDS:

- Any non-appropriated fund (NAF) or NAF portion of a contract action using a mix of appropriated and non-appropriated funding.
- Lease and supplemental lease agreements for real property.
- Grants and entitlement actions.

It is imperative that data submissions to the FPDS be timely and correct. The Federal Funding Accountability and Transparency Act (FFATA), signed on September 26, 2006, requires Federal contract data to be made available to the public via a single, searchable website. FPDS data is transmitted to this website (www.usaspending.gov) on a daily basis. Data from the FPDS is used by the White House, Congress, the Government Accountability Office, other Federal executive agencies, the general public, and the Small Business Administration (SBA) in calculating agency goals. DOI managers also rely on FPDS data 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 that reliable, complete, and timely data are maintained.

5. Actions Required:

A. Data Entry

- (1) All procurement actions that have the potential of exceeding the micro-purchase threshold, including those made with the Government purchase card, must be entered into the FPDS.
- (2) Data must be entered into the FPDS and confirmed for accuracy as close to real time as possible. Before an action is submitted from the DOI contract writing system, it must be confirmed for accuracy before the contract document is released for award. If an action is being submitted via the FPDS web portal, 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 the FPDS 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 the FPDS must be reviewed and approved by the Contracting Officer who signed the procurement action.
- (5) Corrections to and deletions of FPDS actions must be made by the administering Contracting Officer. The following exceptions may apply:
 - a. Changes, and/or deletions that cannot be made by the administering Contracting Officer and require intervention by FPDS support. In this case, the bureau FPDS administrator must contact the DOI FPDS administrator to identify any issues where they feel this applies. If appropriate, the DOI FPDS administrator will request assistance from FPDS Support.
 - b. When a unique circumstance exists making (4) impractical, e.g., mass corrections, and a waiver has been obtained from the DOI FPDS administrator.
- (6) Reporting and reviewing personnel must pay particular attention to the accuracy of all FPDS data elements (See Exhibit 1, Attachment 1 for the specific data fields to be documented during the review).

B. FPDS Data Quality Control Plan

- (1) Each bureau shall establish a procurement data quality control plan to include, at a minimum, the following:
 - Identification of the bureau FPDS system administrator. This individual will serve as a liaison between the Office of Acquisition and Property Management (PAM) and Bureau FPDS users. It is recommended that this person have a background that will enable them to efficiently and accurately determine the correct response for all FPDS data elements. If this individual does not have such a background similar to that stated in paragraph 5.A.(3) above they will not be given full privileges to FPDS.

- The means by which the bureau intends to capture any unique FPDS 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 (BPCs), managers, supervisors, and Contracting Officers must all be held equally accountable.
- Internal controls that are in place to address FPDS data quality.
- The bureau's review process at each level of the organization. For example:
 - The Contracting Officer responsible for signing the contract ensures that a FPDS 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 the FPDS 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 entry that is accurate and complete.
 - At each succeeding supervisory/management level, data is reviewed and certifications that all applicable data is entered into the FPDS and is accurate are provided.
 - Standard report data is periodically reviewed for common errors/miscoding so that targeted training/clarification can be provided.

Bureau procurement data quality control plans must be reviewed, updated, and submitted to the Director, PAM at least annually and no later than October 31 of each year. Quality control plans must be signed by the BPC.

C. Review and Certification

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

(1) Quarterly Reviews and Certifications.

- a. Each bureau shall perform quarterly reviews of its FPDS data.
- b. All data elements for each FPDS action must be validated against the associated contract file.
- c. The review of an FPDS action report **shall not** be conducted by the approving Contracting Officer, or other individual who prepared the action.
- d. Using the sample size projection provided by PAM for the applicable quarter, each bureau will select actions that proportionally reflect the types of actions (e.g., Purchase Order, Definitive Contract) entered into the FPDS 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.

e. The review of each action must be documented, and a Detailed Reviewed Actions Report (DRAR) must be submitted to PAM with the BPC's quarterly FPDS Data Quality Report. The DRAR shall include for each action reviewed: Agency, Office, PIID, modification number, Referenced IDV PIID, Type of Action, Obligation Amount, Created by User, Reviewer, Date Reviewed, and the FPDS key data elements specified in Exhibit 1, Attachment 1. The report must indicate if any errors found within these data elements were caused by the user, the FPDS, or whether there were other contributing factors, e.g., SAM. A description of the error(s) found, corrective action(s) taken, and projected date for corrective action must also be included. The required format for the DRAR can be found at Exhibit 2.

f. Elements that are initially found to be incorrect during a quarterly review must be reported as such, and must **not** be changed to "correct," even if a correction is made after the initial review of the element.

g. 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.

h. When action reviews have been completed and documented, an overall accuracy rate, and accuracy rates for each of the FPDS key data elements, must be calculated in accordance with Exhibit 1, Attachment 2, and documented on the "Accuracy Rates" form at Exhibit 1, Attachment 1.

i. Each BPC must certify the completeness, currency, and accuracy of FPDS data by completing and submitting the quarterly certification document found at Exhibit 1 to the Director, PAM, no later than 30 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.

(2) Annual Review and Certification

a. 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's annual certification.

b. 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 1, Attachment 2; and documented on the Accuracy Rates form at Exhibit 1 Attachment 1.

c. Each BPC must certify the completeness, currency, and accuracy of FPDS data by completing and submitting their annual FPDS Data Quality Report to the Director, PAM, no later than October 31. The Annual Reviewed Actions Report and completed Annual Data Element Accuracy Rates form must be included with the Data Quality Report as attachments. The

certification must confirm that all applicable actions were approved by the responsible Contracting Officer, and are accurate.

D. FPDS Data Quality Report Schedule

(1) An FPDS Data Quality Report schedule has been provided as exhibit 3 for your use.

6. **Additional Information:** If you have questions contact Chip DiMuzio of my staff at (202) 513-0797.



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

Attachments

FPDS Data Quality Report

Check One: Quarterly () Annual ()

Bureau Name: _____

Fiscal Year: _____

Quarter: _____

Bureau Data

Number of Contracting Offices Providing Data to FPDS: _____
 Total Procurement Obligations reported this period: _____ (\$ in millions)
 Number of Actions Entered into FPDS this period: _____
 Number of Actions Reviewed this period: _____

Part I - Data Quality Certification

Certification Statement

I certify that ____% of all reportable contract actions awarded during FY _____, **Quarter** ____ for my bureau have been entered into FPDS within appropriate time frames and in accordance with applicable guidelines. **[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 under the following section of this Part.]**

Explanation of Data Missing from Certification

[Use additional pages as necessary to discuss any procurement data that are not included in this certification. Identify data belonging to organizations that have been unable to enter their data into FPDS as well as contract writing system (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.]

Part II - Assuring Data Input Accuracy

Controls over Data Input

1. Provide the percent of the bureau’s FPDS contract action reports (CARs) entered through the following means:
 - a. Contract Writing System _____ %
 - b. Web Portal (On-line login) _____ %
 - c. Other _____ %
 - Total 100 %

If applicable, please describe any "Other" method(s) used:

Data Quality Assurance Procedures – Updates to Bureau Data Quality Plans

In brief, please discuss the bureau internal control procedures for FPDS data quality, referencing any information, updates, or changes to the bureau data quality plan submitted to PAM. Please include:

- a. Any changes to the data quality plans submitted to PAM;
- b. Examples of successful practices contributing to consistently high data quality;
- c. Examples of bureau success with improving elements of procurement data quality;
- d. Barriers or challenges identified through the bureau review process for which PAM could offer support or solutions.

Required Signature

BUREAU PROCUREMENT CHIEF NAME (Printed)

BUREAU PROCUREMENT CHIEF SIGNATURE

DATE

Bureau Name: _____ **FY:** _____ **Qtr:** _____ **Overall Accuracy Rate:** _____ %

Total Obligations for Records Sampled this Period: _____
 Percent of Total Procurement Spend Covered by Sample: _____ %
 Total Obligations for this Period: _____

Accuracy Computation for Key Data Elements

Systemic Causes of Invalid Data

Data Element Name	(Column A) No. of Records Reviewed	(Column B) No. of Correct Records	(Column A/ Column B as %) Accuracy Rate	(Check all that apply) User <u> </u> FPDS <u> </u> Other <u> </u>
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	_____	_____	_____	_____
6A Type of Contract	_____	_____	_____	_____
6F Performance Based Service Acquisition	_____	_____	_____	_____
6M Description of Requirement*	_____	_____	_____	_____
8A Product/Service Code	_____	_____	_____	_____
8G Principal NAICS Code	_____	_____	_____	_____
9A DUNS No	_____	_____	_____	_____
9H Place of Manufacture	_____	_____	_____	_____
9K Place of Performance ZIP Code (+4)	_____	_____	_____	_____
10A Extent Competed	_____	_____	_____	_____
10C Reason Not Competed	_____	_____	_____	_____
10D Number of Offers Received	_____	_____	_____	_____
10N Type of Set Aside	_____	_____	_____	_____
10R Statutory Exception to Fair Opportunity	_____	_____	_____	_____
11A CO's Business Size Selection	_____	_____	_____	_____
11B Subcontract Plan	_____	_____	_____	_____
12A IDV Type	_____	_____	_____	_____
12B Award Type	_____	_____	_____	_____
Total Records Sampled	_____	_____	_____	_____

* Review of this data element must also consider the proper use of the "Inherently Governmental Function" indicator.

Making Statistically Valid Comparisons of FPDS Data and Contract Files

This Attachment provides guidance on how bureaus are expected to conduct statistically valid comparisons of their FPDS data and the underlying contract files. This guidance includes the procedures required to conduct statistically valid, independent reviews of FPDS data, as well as definitions of key terms, e.g., accuracy rate.

Procedures:

Although bureaus are expected to establish their own internal procedures for sampling and validating their FPDS data, these procedures must conform to the requirements of DIAPR 2013-5 and the following:

1. In designing their samples, bureaus shall ensure that the contract action reports sampled are selected randomly from a population of FPDS records that includes all of the FPDS use cases (i.e., transaction types) employed by the bureau (however, do not include "draft" FPDS records in the sample). Bureaus are also strongly encouraged to stratify their samples and/or also target known problem areas for special scrutiny.

More specifically, bureaus shall select a sufficient number of CARs to review so that they can report accuracy rates separately for each of the required data elements with acceptable precision. Bureaus should also consider the amount of spending associated with the CAR in their sampling of CARS. This could be done by stratifying the CARS into different categories based on their level of spending or by sampling with probabilities proportional to the amount of spending.

2. Each sampled contract action report (CAR) must be validated against the associated contract file by an individual other than the contracting officer who awarded the contract or the person entering the contract data for that contract action record. Although some bureaus may also validate their FPDS data against the corresponding data in their contract writing systems, ultimate data verification **must** be made against the official contract files. The reviewer must obtain sufficient information to validate any CAR data elements not contained in the contract file or contract writing system (CWS). Data elements that cannot be validated must be considered incorrect. This includes CAR data elements that match data in the contract file or CWS that the reviewer and his/her supervisor determine to be inaccurate.

3. Each data element listed in Attachment 1 shall be reviewed for accuracy when it is available for entry on the FPDS use case or brought forward on a Delivery/Task Order, BPA Call, or Modification from the base record,

4. Bureaus shall only use personnel with a working knowledge of and experience with federal procurement processes and the FPDS system to conduct the data validation reviews.

5. Special focus shall be placed on the "Description of Requirement" data element. This field shall include a description of the goods/services that were procured that is clear and can be understood by the general public. If it does not, the field shall be considered inaccurate. Additionally, when applicable, if this field does not contain the correct Inherently Governmental Function designator the field will be considered inaccurate.

Definitions:

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 Attachment1. 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 data elements 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 (or “use case”) being validated should be counted in computing the accuracy rate. There are many data elements that are not required for certain types of records, e.g., data element 6A, Type of Contract, for a BPA Call. Such “not required” data elements should not appear in those records and therefore can’t be validated. Data elements that are required for 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 to be determined accurate. Certain data elements are optional for certain record types, e.g., data element 10A, Extent Completed, is optional for a Delivery Order. If there is a value for an optional data element, that data element must be treated as though it were required. If there is no value for an optional data element, it should be treated as though it were not required. See attachment

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. Bureaus are expected to select these records in accordance with DIAPR 2013-5, paragraph C(1)..

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.

FPDS Data Quality Report Schedule

Frequency	Document	Due Date	Guidance	Format
Quarterly	FPDS Data Quality Report	NLT 30 days after end of Quarter	DIAPR 2013-5	Exhibit 1
Quarterly	Accuracy Rates	NLT 30 days after end of Quarter	DIAPR 2013-5	Exhibit 1, Attachment 1
Quarterly	Detailed Reviewed Actions Report (DRAR)	NLT 30 days after end of Quarter	DIAPR 2013-5	Exhibit 2
Annual	FPDS Data Quality Plan	October 30	DIAPR 2013-5	N/A
Annual	FPDS Data Quality Report	October 30	DIAPR 2013-5	Exhibit 1
Annual	Accuracy Rates	October 30	DIAPR 2013-5	Exhibit 1, Attachment 1
Annual	DRAR	October 30	DIAPR 2013-5	Exhibit 2