

## Agency Federal Procurement Data System (FPDS) Data Quality Plan

The Office of Management and Budget (OMB) issued memorandum, “Improving Acquisition Data Quality for Fiscal Years 2009 and 2010” dated October 7, 2009. This memorandum supersedes the Fiscal Year (FY) 2009 guidance for “Improving Acquisition Data Quality-FY 2009 FPDS Data” dated November 13, 2009. Agencies shall complete actions below in order to comply with OMB’s requirement ensuring FY 2010 FPDS data reflects accurate and timely contract information.

**Mission:** This summary addresses USDA’s agencies’ responsibilities to improve its procurement data through FPDS Verification & Validation (V&V) policies and procedures.

**Agencies responsibilities:** For the end of FY2010, agencies will:

- Input the contract data fully and accurately into FPDS by September 30;
- Submit certification of accuracy of contract data input into FPDS by December 16;
- Submit responses to the FY 2010 FPDS Data Call Questions by December 16;
- Perform intra-agency reviews of contracts as required;
- Improve contract documentation and ensure that files are easily located and readily reviewable;
- Ensure the reviewer is not the person awarding the contract action.

**USDA FPDS V&V Process Timeline:** The table below summarizes the timeline for the USDA FPDS V&V Process.

| <b>USDA FPDS V&amp;V Process Timeline</b> |  |
|---|--|
| <b>Date</b>                               | <b>Task</b>  |
| September 30                              | Agencies complete fiscal year transactions and ensure accurate contract data.  |
| November 19, COB                          | OPPM selects a randomly generated set of PIIDs for each specific agency. OPPM develops V&V Data Workbook with individual PIIDs and distributes them to the agencies’ POCs via email.   |
| December 16                               | Agencies compare the randomly selected contracts actions to the individual data fields entered into FPDS and populate their V&V Data Workbook. Agency <b>Head of Contracting Activity Designee (HCA-D)</b> submit FPDS accuracy certification to Dorothy Lay, Chief of Procurement Policy Division (PPD) at <a href="mailto:Dorothy.Lay@dm.usda.gov">Dorothy.Lay@dm.usda.gov</a> , and a copy email to Crandall Watson at <a href="mailto:Crandall.Watson@dm.usda.gov">Crandall.Watson@dm.usda.gov</a> . |
| December 16                               | Agencies complete FY 2010 Data Call Questions provided in Appendix 3. Agency <b>HCADs</b> submit answers along with FPDS accuracy certification to Dorothy Lay with a copy by email to Crandall Watson.  |
| December 16                               | OPPM completes review of the agencies V&V spreadsheets. If the overall USDA department-wide accuracy percentage does not meet 0.95 ±5%; the <i>specific</i> agency that did not meet the required accuracy rate will be notified via email to the POC and HCAD.  |
| December 17                               | OPPM will randomly select another set of PIIDs for those specific agencies that did not meet the accuracy percentages. OPPM will re-distribute a second V&V Data Workbook to agency POC’s via email.   |
| December 29, COB                          | Agencies compare the second set of randomly selected contracts actions to individual data fields entered in FPDS and populate their V&V Workbook. Agencies revalidate and <b>HCADs</b> submit the revised FPDS accuracy certification to Dorothy Lay with a copy by email to Crandall Watson.  |
| January 5                                 | Senior Procurement Executive (SPE) submits department-wide FPDS V&V results to OMB’s Office of Procurement Policy (OFPP).  |

Appendix 1 provides an example of the Agency V&V Data Workbook.

Please note: New FPDS Data Fields are highlighted in green

| Individual PIID Worksheet                     |   |                           |      |                                |       |
|---|---|---------------------------|------|--------------------------------|-------|
| PIID  | ABCD1234  |                           |      | Systemic Cause of Invalid Data |       |
| Field #                                       | Field Name  | C=Correct,<br>I=Incorrect | User | System                         | Other |
| 2A  | Date Signed   | I                         | X    |                                |       |
| 2C  | Completion Date   | C                         |      |                                |       |
| 2D  | Est. Ultimate Completion Date   | I                         | X    |                                |       |
| 2E  | Last Date to Order  | C                         |      |                                |       |
| 3A  | Base and All Options Value  | I                         | X    |                                |       |
| 3B  | Base and Exercised Options Value  | I                         | X    |                                |       |
| 3C  | Action Obligation   | I                         | X    |                                |       |
| 4C  | Funding Agency ID   | C                         |      |                                |       |
| 6A  | Type of Contract  | C                         |      |                                |       |
| 6F  | Performance Based Service Acquisition                                       | C                         |      |                                |       |
| 6M  | Description of Requirement  | C                         |      |                                |       |
| 6SI   | Treasury Account Symbol Initiative  | C                         |      |                                |       |
| 8A  | Product/Service Code  | C                         |      |                                |       |
| 8G  | Principal NAICS Code  | C                         |      |                                |       |
| 9A  | DUNS No.  | C                         |      |                                |       |
| 9C  | Principal Place of Performance Code- State                                  | C                         |      |                                |       |
| 9C  | Principal Place of Performance Code- Country                                | C                         |      |                                |       |
| 9H  | Place of Manufacture  | C                         |      |                                |       |
| 9K  | Place of Performance ZIP Code (+4)  | C                         |      |                                |       |
| 10A   | Extent Competed   | C                         |      |                                |       |
| 10C   | Other than Full and Open Competition  | C                         |      |                                |       |
| 10D   | Number of Offers Received   | C                         |      |                                |       |
| 10N   | Type of Set Aside   | C                         |      |                                |       |
| 10R   | Statutory Exception to Fair Opportunity or Fair Opportunity/Limited Sources | C                         |      |                                |       |
| 11A   | CO's Business Size Selection  | C                         |      |                                |       |
| 11B   | Subcontract Plan  | C                         |      |                                |       |
| 12A   | IDV Type  | C                         |      |                                |       |
| 12B   | Award Type  | C                         |      |                                |       |
| Total Correct                                 |   | 22                        |      |                                |       |
| Total Incorrect                               |   | 5                         |      |                                |       |
| Total Count                                   |   | 28                        |      |                                |       |
| Percentage Correct                            |   | 78.57%                    |      |                                |       |
| Total Errors By Cause                         |   |                           | 5    | 0                              | 0     |
| Percentage of Total Number of Errors By Cause |   |                           | 100% | 0%                             | 0%    |

|                    |
|--------------------|
| Reviewer Name      |
| Reviewer Signature |

Fax to: \_\_\_\_\_

Appendix 2 is for informational use only. This table represents an estimated number of contract actions that each agency can expect to review based upon FY 2009 data. The USDA V &V Distribution Chart for FY 2010 will correlate with FY2010 FPDS data.

| <b>FY 2009 FPDS</b> | <b>Sum of Total Actions</b> | <b>Percent of Total</b> | <b>Base</b> | <b>Pro-rated add on</b> | <b>Total</b> |
|---------------------|-----------------------------|-------------------------|-------------|-------------------------|--------------|
| AMS                 | 1,612                       | 2.28%                   | 20          | 3                       | 23           |
| ARS                 | 6,962                       | 9.83%                   | 20          | 14                      | 34           |
| APHIS               | 5,459                       | 7.71%                   | 20          | 11                      | 31           |
| FSA KCCO ONLY       | 1,670                       | 2.36%                   | 20          | 3                       | 23           |
| FSA NON ONLY        | 1,556                       | 2.20%                   | 20          | 3                       | 23           |
| FNS                 | 585                         | 0.83%                   | 20          | 1                       | 21           |
| FSIS                | 1,017                       | 1.44%                   | 20          | 2                       | 22           |
| FS                  | 36,362                      | 51.34%                  | 20          | 73                      | 93           |
| NRCS                | 3,931                       | 5.55%                   | 20          | 8                       | 28           |
| OIG                 | 158                         | 0.22%                   | 20          | 0                       | 20           |
| RD                  | 7,563                       | 10.68%                  | 20          | 15                      | 35           |
| POD                 | 3,946                       | 5.57%                   | 20          | 8                       | 28           |
| <b>USDA TOTAL</b>   | <b>70,821</b>               | <b>100%</b>             | <b>240</b>  | <b>142</b>              | <b>382</b>   |

*\*BASED ON FY 2009 DATA*

## FY 2010 FPDS Data Call Questions:

Please have your agencies review and answer these questions.

### **Independence of Reviewers**

1. Discuss whether the persons who reviewed and validated the FPDS data were government employees, contractors, or a combination thereof.
2. Were all sampled PIIDs validated against the associated contract files by individuals other than the persons who entered the contract data for those PIIDs and the contracting officers who awarded those contracts? If not, explain why not. Also, discuss additional steps, if any, you have taken beyond those required by OFPP guidance that address the independence issue.
3. Discuss any changes that the agency plans to make with respect to this issue in subsequent fiscal years.

### **Qualifications of Reviewers**

1. Describe the qualifications reviewers were required to have with respect to contracting experience and FPDS.
2. Describe any special training on Federal procurement rules and procedures that was provided to the reviewers
3. Describe any special training on FPDS that was provided to the reviewers.
4. Discuss any changes that the agency plans to make with respect to this issue in subsequent fiscal years.

### **Adequacy of Review**

1. Identify whether the reviewers compared the data elements in FPDS to the information in the contract file. If not, describe how they validated the data elements.
2. Identify whether the review included additional steps to validate the FPDS data beyond a comparison to the contract file (e.g., logic tests of relations among related data elements, anomaly reports, etc.) Describe the additional methods used.

*New Section* “Improving the Use of Past Performance”

OPPM added a tab to the USDA V & V Workbook titled, “Contractor Past Performance”.

For each PIID all agencies shall determine whether a past performance evaluation was completed in the Contractor Performance System (CPS) or the Contractor Performance Assessment Reporting System (CPARS).

\*Please Note for FY 2010 contracts/PIIDS your agency will mainly need to check PPIRS because USDA’s previously used CPS system has been retired. There is a possibility that some agencies began using CPARS before the end of FY 2010, so please check both systems if necessary.

For each PIID your agency will enter one of the three following options:

(Y)- Entered and completed

(N)- Not entered

(P)- In process

Contractor Performance Data Call Questions:

1. For each contract/PIID marked with an **N** (no), in regards to entering a contractor performance review, please state the reason why it has not yet been entered into either CPS or CPARS and your agency milestone plans for bringing these records into CPARS.
2. Discuss any barriers or challenges that your agency faced in implementing accountability for inputting contractor performance evaluations throughout the agency, and any steps that the agency has taken, or is planning to take, in FY 2011 to improve such accountability.

Next Steps for Final Compliance:

Agency Focal Point’s will be responsible for providing a status update to their HCAD when all applicable contractor past performance evaluations for the contracts/PIIDS included in the FPDS V&V Plan (that were marked with a **N**) are completed for the year or within **6 months of December 16, 2010**, whichever is sooner.

Agency HCADs will be responsible for approving and submitting the Focal Point’s follow-up assessment report to the Chief of PPD for review by the Senior Procurement Executive (SPE).