Improving Acquisition Data Quality Plan FY 2008 FPDS-NG Data

Office of the Senior Procurement Executive
August 6, 2008

Purpose. This serves as the Department of Transportation's (DOT) Plan for continual improvement of the acquisition data reported to the Federal Procurement Data System (FPDS).

Background. On May 9, 2008, Office of the Federal Procurement Policy (OFPP) issued a memorandum requiring additional steps to verify and validate the accuracy of data in FPDS. The memorandum required each Chief Acquisition Officer (CAO) to establish requirements to ensure that the 2008 FPDS acquisition data is reflected accurately and timely.

This plan incorporates the requirements of the OFPP memorandum and provides instruction to the Operating Administrations (OAs) for completion of tasks to support the data accuracy improvement effort.

Role & Responsibility.

The Office of the Senior Procurement Executive/Acquisition Oversight

1. Maintain this plan and update annually; provide annual update for the coming fiscal year by September 30th to Operating Administrations (OAs) and to OFPP as requested.
2. Review OA data V&V reports, approve recommendations and proposed corrective action plans.
3. Track accuracy trends by OA and by data field.
4. Provide overall DOT annual certification of data accuracy and completeness to OFPP according to OA certifications and data V&V results.
5. Serve as the Department's lead representation to the federal FPDS Change Control Board (CCB) and other related group.

Guidance.

Contracting Officers shall incorporate the processes and procedures identified by this plan into existing contract award review processes and procedures established within the Operating Administration (OA). To provide an overarching framework for each OA to construct processes and procedures to effectively manage the requirement, once administrative processes have been finalized within the Office of the Senior Procurement Executive, this policy/plan will be institutionalized in the Transportation Acquisition Manual (TAM).

Department/Agency Name: U.S. Department of Transportation (DOT)

Fiscal Year and Quarters of FPDS-NG Data Subject to this Plan: Fiscal Year 2008, Quarters: 1-4

Applicability: This plan is applicable to each DOT Operating Administration (OA) that has procurement authority and is transmitting acquisition data to FPDS-NG.

Please describe the activities your agency plans to perform to validate its FPDS data for the fiscal year and quarters shown above. Please describe these activities under the applicable headings below in as much detail as necessary to provide a clear explanation. Use additional pages as needed.

How Component Organizations and Individuals Are Held Accountable for Data Accuracy

Each OA Chief Contracting Officer shall certify annually to the SPE that verification and validation processes and procedures are in place and have been followed, and the data transmitted to FPDS-NG is accurate and complete to the best of their knowledge.

The OSPE will use the independent verification and validation outcomes from the procedures described in DOT Acquisition Policy Letter (APL) 2007-003 to support the final certification.

Steps Planned to Improve the Accuracy of Data Entered into Contract Writing Systems and FPDS-NG:

APL 2007-03 requires each OA to activate the FPDS-NG award feature in their contract writing system, eg., PRISM – "Require Valid FPDS-NG for Award Release" and disable the "FPDS-NG Validation Override". Additionally, a "Quick Tips Reference Guide for FPDS-NG Reporting" has been developed, printed and disseminated to all of the Department's Contracting Offices/Officers. These actions facilitate the timely submission of data strengthening our ability to make informed business decisions.

Steps Planned to Improve Data Accuracy after Data Entry (other than conducting a statistical sample of FPDS data)

OAs shall employ the quality control reporting features provided by FPDS-NG and their respective contract writing system, e.g., the Individual Data Item Oversight Tracker Report (IDIOT) and Award Summary Report for Released Awards. This will ensure the early identification of discrepancies and trigger prompt resolution of identified discrepancies.

Other Steps Planned to Improve Data Accuracy.

On a monthly basis, OAs are advised of changes impacting the Integrated Acquisition Environment, to include statutory, regulatory, system and processes. On a quarterly basis, OA's are provided additional training by OSPE staff targeted to the specific needs of the OA.

Data Validation Approach

It is important that the data validation approach used by agencies produce credible results. Therefore, agencies are requested to conduct statistically valid comparisons of their FPDS data to their contract files, and to explain their sampling plans in the format provided by Attachment A to this Exhibit. Agencies that choose to use methods other than the requested method for validating their FPDS data should describe

these alternate methods under "Other Steps Planned to Improve Data Accuracy" above. This description should also explain the advantages and disadvantages of the alternative methods compared to the requested method.

JOANIE F. NEWHART, CPCM
SENIOR PROCUREMENT EXECUTIVE NAME (Printed)

Joanie F. Newhart   _Aug. 6, 2008_
SENIOR PROCUREMENT EXECUTIVE SIGNATURE   DATE

Approach for Conducting Statistically Valid Comparison of FPDS-NG Data and Contract Files

This Attachment provides a standard format to report key information about the statistically valid sampling methodology that will be used to validate the accuracy of FPDS data.

Number of Contracting Offices Expected to Provide Data: 33 (This number surprised me. What makes up this number? I would have guess about 10---the various modes.)

Sampling Approach Planned:

➤ **Contract Identification for Sampling**:

Sample size is based on the contract population (# of Actions) per the following Award Types:

BPA	Definitive Contract
BOA	Indefinite Contract
BPA Call	Delivery Order
Purchase Order	

Determine Sample Size <Use Online Calculator>: http://www.ezsurvey.com/samplesize.html

➤ **Confidence Level**:

Confidence level gives us the success rate of the procedure used to construct the confidence interval. Often expressed as the probability 1-α (often expressed as the equivalent percentage value) that is the proportion of times that the confidence interval actually does contain the population parameter. (The confidence level is also called the degree of confidence, or the confidence coefficient.)   Most common choice f/confidence level:

➤ **Stratified Sampling:**
Subdivide the population into at least two different subgroups (strata) that share the same characteristics (Department of Transportation, Type Contract) then draw a sample from each subgroup.

➤ **Example**:

❖ Department of Transportation
   o Operating Administration
      ▪ Type of Contract
         • Contract Value

When an award is selected for verification/validation, *all awarded actions* (base and all modifications) will be reviewed in concert with the associated FPDS-NG record.

All reportable information (FPDS-NG) will be verified and validated utilizing the checklist identified by Attachment B.

How will samples of FPDS records be selected and by whom?

Using the strategy described below, once the sample size has been determined, a listing of records contained within the sample population is generated and forwarded to the Associate Director, Acquisition Oversight for identification/selection of actions for verification and validation. Once the listing of actions for verification and validation has been generated, the list is provided to the affected Contracting Office for file retrieval and scheduling of data verification and validation.

How will statistical validity of the sample be determined?
Using stratified sampling, the statistical population size will be determined by generating an FPDS-NG report identifying the number of contract actions reported to FPDS-NG during the specified time period by award type (i.e., BPA, BPA Call, Delivery Order, etc.). Once the population has been determined, the sample size will be determined utilizing the statistical calculator found at http://ezsurvey.com/samplesize.html. Standard parameters employed across the department are a confidence level of 95% with a margin of error of 5%.

Who will conduct independent review of FPDS data quality?

The Acquisition Oversight Team, , augmented with contractor support, will perform the independent review of FPDS-NG data for those contracting offices located within DOT Headquarters, Washington, DC. Contracting Offices located outside the DOT Headquarters will perform the verification and validation requirement using the checklist provided by attachment (Need to add the Attachment number). Reviews will be performed by a Contracting Officer/Specialist not associated with the award/review of the contract being verified and validated. Records of the verification and validations performed will be maintained with a quarterly report including a copy of the verification/validation checklist provided to the Office of the Senior Procurement Executive.

U.S. Department of Transportation
Office of the Senior Procurement Executive
Acquisition Data Quality Checklist

PIID: _____   # of Modifications in current FY:

_____

REF IDV PIID: _____

Contract reflects _____# of modifications executed to date.
FPDS-NG reflects _____# of modifications reported to date.

Contract Identification/Dates/Dollar Values/Transaction Information

Seq. NO	Data Element	Data Source			N/A	Inaccurate	Remarks
		CWS	CCR	User			
1A	Procurement Identified	X					
1C	Referenced IDV PIID	X					
2A	Date Signed	X					
2B	Effective Date	X					
2C	Completion Date	X					
2D	Est. Ultimate Completion Date			X			
2E	Last Date to Order			X			
3A	Base and All Options Value			X			
3B	Base and Exercised Options Value			X			
3C	Action Obligation			X			
12A	IDV Type	X					
12B	Award Type	X					

Contractor Data

Seq. NO	Data Element	Data Source			N/A	Inaccurate	Remarks
		CWS	CCR	User			
9A	DUNS number	X					
9B	Contractor Name		X				
9C	Principal Place of Performance Code			X			
9H	Place of Manufacture- products only			X			
9J	CCR Exception			X			
9K	Place of Performance Zip +4			X			
13P	Small Disadvantaged Business		X				
13O	HUBzone Firm		X				
13U	Woman Owned Business		X				
13V	Veteran Owned Business		X				
13UA	Minority Owned Business		X				

Contract Information/Legislative Mandates

Seq. NO	Data Element	Data Source			N/A	Inaccurate	Remarks
		CWS	CCR	User			
6A	Type of Contract			X			
6M	Description of Requirement			X			
6N	Purchase Card Payment Method			X			
6R	National Interest Action			X			

7B	Walsh-Healy Act			X			
7C	Service Contract Act			X			
7D	Davis-Bacon Act			X			

Product/Service Information/Contract Marketing Data

Seq. NO	Data Element	Data Source			N/A	Inaccurate	Remarks
		CWS	CCR	User			
5B	Who Can Use			X			
5D	Fee for Use of Service			X			
5J	Fee Paid for Use of IDV			X			
8A	Product/Service Code	X					
8G	Principal NAICS Code	X					
8K	Use of EPA Designated Products			X			
8L	Use of Recovered Material			X			
8N	Bundled Contract			X			

Competition Information/Preference Programs

Seq. NO	Data Element	Data Source			N/A	Inaccurate	Remarks
		CWS	CCR	User			
10A	Extent Competed			X			
10C	Reason Not Competed			X			
10D	Number of Offers Received			X			
10M	Solicitation Procedures			X			
10N	Type of Set Aside			X			
10P	Evaluated Preference			X			
10R	Statutory Exception to Fair Opportunity (optional?)			X			
11A	CO's Business Size Selection			X			
11B	Subcontract Plan (required on DCA Only)			X			

Comments/Remarks:

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Date:_____
Verifier Initial:_____

FY 2008 FPDS-NG Procurement Data Certification

1. **Department/Agency Name:** U.S. Department of Transportation
   Operating Administration Name: _____

2. **Date of Submission Certification:** I certify that ____% of all reportable contract actions awarded during FY 2008 for my department/agency have been entered into FPDS as fully and accurately as possible as of the date of my signature. Administrations 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? (<u>Answer all</u>.)

a.	Collected certifications from subordinate offices	YES	NO
b.	Through statistically correct processes, compared FPDS data to data in the corresponding contract files. (If you answered "Yes" here, please complete the information requested in Attachment A.)	YES	NO
c.	Other V&V actions taken for FY '08 (Provide in format of Attachment B)	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(s) (CWS)	YES ____ %	NO
b.	Web Portal (On-line login)	YES ____ %	NO
c.	Other	YES ____ %	NO
	Total	100 %	

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. **<u>General Comments (Include on added page(s), if needed)</u>:**

7. _____
   Chief of Contracting Office Name (Printed)

8. _____ _____
   Chief of Contracting Office Signature   DATE

Department/Agency Name: U.S. Department of Transportation
Operating Administration Name: _____

Fiscal Year of FPDS Data: FY 2008

Results of Statistically Valid Comparison of FPDS Data and Contract Files

This Attachment provides a standard format for agencies to use in reporting key information about the sampling methodology used to determine the accuracy rates shown on Attachment C. (Note that the data element names on that attachment are as they appear on the FPDS screens.) Please summarize the results collected from all subordinate offices that validated and certified their own data 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.

Number of Subordinate Offices Providing Data: _____

Sampling Approach(es) Used That Deviated from Data Quality Plan:

Please describe any sampling activities under the following headings that deviated from the Data Quality Plan your provided in August 2008. If your activities under the applicable headings below were totally consistent with your Plan, please just state that.

How were samples of FPDS records selected and by whom?

How was statistical validity of sample determined?

Who conducted independent review of FPDS data quality?

Total FY 2008 Procurement Spend: _____($ in millions)

Total Sample Size: _____   Percent of Total Procurement Spend Covered by Sample: _____%

Department/Agency Name: _____

Fiscal Year of FPDS Data: _____

Other Agency Activities to Verify and Validate FPDS Data

Please describe any other activities your agency performed to validate its FPDS data for the fiscal year shown above, with particular attention to activities that deviated from the Data Quality Plan your agency submitted in June. If your activities under the applicable headings below were totally consistent with your Plan, please just state that. Use additional pages as needed.

How Component Organizations and Individuals Were Held Accountable for Data Accuracy

Steps Taken to Improve the Accuracy of Data Entered into Contract Writing Systems and FPDS

Steps Taken to Improve Data Accuracy After Data Entry (other than conducting a statistical sample of FPDS data)

Other Steps Taken to Improve Data Accuracy

Agencies that chose to validate their FPDS data using an approach other than a statistically valid sampling methodology are still expected to report their accuracy rates as shown on Attachment C. (Note that the data element names on that attachment are as they appear on the FPDS screens.) Please summarize the results collected from all subordinate offices that validated and certified their own data 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.

<u>FPDS-NG Verification and Validation Milestone</u>

Timeline	Milestone	Responsibility
Quarterly	Independent Verification and Validation	OSPE
	---Results provided to OA	OSPE
	---Report of corrective actions completed provided	OA
Quarterly	Cycle repeats ISO the previous quarter	All
Dec 5th	Annual FPDS-NG Certification	OA
Jan 5th	Annual FPDS-NG Certification	SPE

Key:

OSPE-Office of the Senior Procurement Executive
OA-Operating Administration
SPE-Senior Procurement Executive