

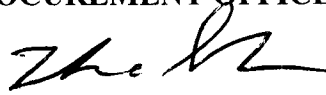


DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

Acquisition Bulletin (AB)
No. 07-02 R1
July 9, 2008

MEMORANDUM FOR BUREAU CHIEF PROCUREMENT OFFICERS

FROM:

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Senior Procurement Executive
Office of the Procurement Executive

SUBJECT:

AB 07-02 R1: Treasury Procurement Data Integrity Procedures

Purpose: This Acquisition Bulletin (AB) serves to update the Departmental plan for assuring the accuracy of data entered into the Federal Procurement Data System – Next Generation (FPDS-NG) through validation and verification (V&V).

Effective Date: This AB is effective immediately.

Expiration Date: This AB will expire when cancelled or superseded.

Background: On May 9, 2008, the Office of Federal Procurement Policy (OFPP) issued a memorandum containing guidance on improving the quality of acquisition data. This guidance builds on and supersedes the March 9, 2007 OFPP-issued memorandum requiring additional steps to verify and validate the accuracy of data in FPDS-NG. The March 9, 2007 memorandum required each Chief Acquisition Officer (CAO) to establish requirements to ensure that FPDS-NG data are accurate and timely. At a minimum, the requirement was that we:

- Establish a department-wide requirement for routine, independent, statistically valid data V&V.
- Provide certification of data accuracy and completeness to the General Services Administration (GSA) each year, as will be required in an upcoming Federal Acquisition Regulation (FAR) case specifically designed to clarify FPDS-NG roles and responsibilities.
- Assign clear data verification responsibilities.
- Make necessary adjustment to our policies, procedures, and training, as needed.

The May 9, 2007 memorandum builds on and supersedes the FY 2007 guidance for verifying, validating, and certifying FPDS data and includes additional information on the desired format for reporting V&V of FPDS data, based on lessons learned and best practices developed over the past year. Based on this memorandum, Treasury must certify the FY 2008 procurement data and submit the required report to OFPP by January 5, 2009.

Actions Required:

1. Bureau Chief Procurement Officers (BCPOs) shall:
 - a. Develop a plan to ensure that all contracting officers / contract specialists enter data on procurement actions into FPDS-NG no later than three (3) days after the award of the action.
 - b. Develop a plan to review reports issued by OPE within 14 calendar days of the issuance of the reports. The reports shall include, but are not limited to, the following:
 - i. The Status of Actions Report;
 - ii. Null Value reports for Competition, Funding Agency ID, Place of Manufacture, Type of Contract, NAICS code, Business Size Determination and others as need;
 - iii. Description of Requirement ad hoc report for review of potential Personally Identifiable Information; and
 - iv. PIID and Reference IDV checks
 - c. Conduct annual V&V in accordance with the V&V Process described below. Each bureau V&V Report is due each year on the last business day on or before December 15.
 - d. Develop a plan for ensuring that all staff with data entry and review functions are evaluated or otherwise receive appropriate management feedback for their role in promoting and maintaining procurement data integrity. The Contracting Officer is ultimately responsible for the accuracy of data supplied to FPDS.
 - e. Implement agreed corrective action plans as identified in the V&V Report and provide status updates to OPE on a quarterly basis. The status update is due on the last business day of each quarter.

2. Office of Procurement Executive (OPE) shall:
 - a. Submit to OFPP by July 15 a data quality plan in accordance with Exhibit 1 of the May 9, 2008 OFPP memorandum.
 - b. Define the scope of each Bureau V&V review no later October 15 of each year.
 - c. Review Bureau V&V Reports and approve the recommendations and proposed corrective action plans.
 - d. Track accuracy trends by bureau and by data field.
 - e. Provide certification of data accuracy and completeness to GSA each year in keeping with each bureau's performance.
 - f. Submit Exhibit 2 of the May 9, 2008 Memorandum to OFPP by January 5 each year.
 - g. Run reports listed in 1.b above on monthly basis and distribute to the appropriate Bureau point of contact.
 - h. Periodically test the Bureau V&V testing procedures as part of the OPE Evaluate and Monitor program.

V&V Process:

By October 15 of each year, OPE will compile the complete list of PIIDs for review, along with

their associated data from FPDS-NG. This list will be called the V&V Review List. This list will be comprised of the fewest number of actions that cumulatively sum to 75% of total obligations, as well as a sample of actions in the bottom 25% of obligations that achieves a margin of error of plus or minus 5% with a 95% confidence level.

Each bureau (Contracting Agency) that uploads records to FPDS-NG shall follow the V&V Process steps as identified below:

Step 1: Perform V&V Review. The BCPO shall arrange to have each PIID on the V&V Review List reviewed by a person working outside the contracting unit that which performed the transaction, for example another operational contracting branch or a procurement policy office. Very small bureaus with no such organizational structure may organize V&V swaps with other bureaus' staff, or work with their own accounting, finance, A-123, Inspector General, or other staff to support the activity.

The V&V reviewers shall conduct the review using the Department of the Treasury Validation and Verification Review Worksheet (Worksheet) (Attachment 2). The Worksheet contains a template for each of the various Indefinite Delivery Vehicle (IDV) or Award Types available in the FPDS-NG system. Types include Delivery/Task Order, Purchase Order, Definitive Contract, BPA Call, Blanket Purchase Agreement, Basic Ordering Agreement, and Other Indefinite Delivery Vehicle. For each PIID assigned, the reviewer shall compare the data for each field in the Worksheet PIID contained in the V&V Review List to the contract file. If the data to support the correct value in FPDS-NG are not available in the contract file, the V&V reviewer may use alternative means to determine the correct value. For example, the V&V reviewer may interview the Contracting Officer responsible, or refer to other relevant sources of information. If the review cannot find any basis upon which to validate the FPDS-NG data, the FPDS-NG data shall be considered in error, and the basis of the error shall be noted clearly in the findings comments.

Regardless of whether or not it was previously required by FPDS-NG to validate a record, complete and accurate data entry in the 'V&V Minimum Review Fields' listed below is mandatory at the Department of the Treasury, effective immediately. This means that when an FPDS-NG data entry template allows a value to be entered, an accurate value shall be entered. This requirement recognizes that data for some fields below are only logical when using certain FPDS-NG templates. The Worksheet contains only the fields applicable to the specific template. For example, 'Referenced IDV PIID' only makes sense in the context of entering data about a task or delivery order and is included on that template. 'Reference IDV PIID' is not on the template for a purchase order.

Treatment of Null Values: It is recognized that some of the fields below, e.g., '6F Performance Based Services Acquisition' are check boxes which are either checked or unchecked. The Treasury requirement is that this field must be accurately completed.

Additionally, for some of the fields a null value may be an acceptable answer. The reviewer has the ultimate responsibility to ensure that the answer, or lack thereof, is the most appropriate answer for that particular field.

V&V Minimum Review Fields

The following fields shall be reviewed as part of the V&V Process. Additional fields may be reviewed at the initiative of each BCPO, such as socio-economic data. The number before the field name refers to the element number in the FPDS-NG Data Element Dictionary. Not all fields apply to each of the review templates.

1A 'PIID' ¹	8N 'Bundled Contract' ¹
1B 'Modification Number'	9A 'DUNS Number' ¹
1C 'Reference PIID'	9C 'Principle Place of Performance'
2A 'Date Signed'	9E 'Country of Product Origin' ¹
2B 'Effective Date'	9H 'Place of Manufacture' ¹
2C 'Completion Date'	9K 'Place of Performance Zip Code(+4)'
2D 'Est. Ultimate Completion Date'	10A 'Extent Competed' ¹
2E 'Last Date to Order'	10C 'Reason Not Competed' ¹
3A 'Base and All Options Value' ¹	10D 'Number of Offers Received' ¹
3B 'Base and Exercised Options Value' ¹	10E 'Pre Award FBO Synopsis' ¹
3C 'Action Obligation' ¹	10H 'Commercial Item Acquisition Procedures' ¹
4A 'Contracting Agency ID' ¹	10M 'Solicitation Procedures' ¹
4C 'Funding Agency ID' ¹	10N 'Type of Set Aside' ¹
4F 'Funded by Foreign Entity'	10P 'Evaluated Preference' ¹
5B 'Who Can Use'	10R 'Statutory Exception to Fair Opportunity'
5D 'Fee for Use of Service'	11A 'Contracting Officer's Business Size Selection' ¹
5J 'Fee Paid for Use of IDV'	11B 'Subcontracting Plan' ¹
6A 'Type of Contract' ¹	11D 'Reason Not Awarded to a Small Disadvantage Business' ¹
6F 'Performance Base Service Acquisition' ¹	11E 'Reason Not awarded to Small Business' ¹
6M 'Description of Requirement' ¹	12A 'IDV Type' ¹
7A 'Clinger Cohen Act'	12B 'Award Type' ¹
7B 'Walsh-Healy Act'	12C 'Reason for Modification' ¹
7C 'Service Contract Act'	13N '8(a) Program Participant' ²
7D 'Davis Bacon Act'	13O 'HUBZone Firm' ²
8A 'Product/Service Code' ¹	13P 'Small Disadvantaged Business' ²
8G 'Principal NAICS Code' ¹	13U 'Woman Owned Business' ²
8K 'Use of EPA Designated Products' ¹	13V 'Veteran Owned Business' ²
8L 'User of Recovered Materials' ¹	13W 'Serviced Disables Veteran Owned Small Business' ²

¹ Field was issued in 07-02 on June 1, 2007

² Field is controlled by CCR feed to FPDS-NG. If errors or omissions exist in these elements, the systemic cause of the error will be FPDS-NG or other system. Errors can not be caused by the user.

If an error is found as part of the independent V&V review process, the V&V reviewer shall record an error as part of the V&V report. This is critical to preserve the statistical validity of

the V&V process. Failure to properly record an error during the V&V process, or targeted efforts to “clean up” records identified for V&V review before the V&V reviewer has examined them, if discovered, will result in the requirement for subsequent reviews to be performed by an outside entity satisfactory to OPE, with any associated costs to be paid by the bureau.

Correction of any errors found during the V&V review *after* having recorded and accounted for them as a statistical matter is **required**. The timing of corrections should be included in the corrective action plan

Step 2: Conduct Root Cause Analysis and Identify Corrective Actions. To consolidate the findings from each of the individual PIID V&V reviews, each BCPO shall designate one or more people to perform analysis to consider how or why each error occurred, identify patterns, or investigate the root nature or cause of the issue. Errors may be caused for different reasons, for example, by system issues, training issues, lack of supervisory emphasis, or other causes. The analysis team should have access to (and may be the same people as) the Independent V&V reviewers.

Corrective actions should attempt to address not just the immediate fix of a data error, but to address the root cause of the error. Corrective actions might include, but not be limited to:

- Recommendations for changes in the settings and validations of the CWS and/or FPDS-NG systems;
- Required policy or definitional clarifications;
- Training issues and needs; or
- Other ideas for improvement.

Step 3: Compile the V&V Report. Each bureau shall report the results of the V&V by fully completing Attachment 1, Error Summary Report Spreadsheet, in accordance with the instructions provided by OPE. The report shall be submitted by the BCPO or designee. Any designation shall be communicated, in writing (email or hardcopy), to OPE.

Questions about this AB may be directed to Patrick Breen at Patrick.Breen@do.treas.gov or (202) 622-0248.

Attachments (3):

1. Error Summary Report Spreadsheet, dated May 19, 2008



Error Summary
Spread Sheet 5-19-08

2. Department of the Treasury Validation and Verification Review Worksheet, dated April 16, 2008



V&V Review
Worksheet 4-16-08.x

3. OMB Memorandum, Improving Acquisition Data Quality – FY 2008 FPDS Data, dated May 9, 2008



Acquisition Data
Quality Improvement