



U.S. Department of Justice

Justice Management Division

Management and Planning Staff

March 22, 2007

Washington, D.C. 20530

MEMORANDUM FOR BUREAU PROCUREMENT CHIEFS

FROM: Michael H. Allen 
Senior Procurement Executive

SUBJECT: DOJ Procurement Guidance Document (PGD) 07-05
Federal Procurement Data Verification and Validation

PURPOSE: As the government's principal repository for acquisition information, the Federal Procurement Data System (FPDS) must be an authoritative source that allows agency managers, contractors, and policymakers to make informed business decisions. While used to measure a broad range of objectives, this data is particularly essential for measuring the level of competition, evaluating success against small business goals, and making decisions on staffing and training. Having accurate and timely information is critical for that process. To that end we are establishing procedures to assure verification and validation of the data entered into the system. By ensuring FPDS is accurate, we will also satisfy most of the requirements of the contract portion of the Federal Funding Accountability and Transparency Act of 2006.

BACKGROUND: The Federal Funding Accountability and Transparency Act of 2006 (The Act) directs the Office of Management and Budget (OMB), by January 1, 2008, to ensure the existence and operation of a single searchable website, accessible by the public at no cost, that includes, for each federal award of federal financial assistance and expenditures (excluding individual transactions below \$25,000 and credit card transactions before October 1, 2008): (1) the amount; (2) information including transaction type, funding agency, the North American Industry Classification System code or Catalog of Federal Domestic Assistance number, program source, and an award title descriptive of the purpose of each funding action; (3) the name and location of the recipient and the primary location of performance; and (4) a unique identifier of the recipient and any parent entity. The Act also requires the website to include data for FY2007 and each fiscal year thereafter; that it may use the Federal Procurement Data System as the source of its data; and, it shall be updated not later than 30 days after issuance of any federal award requiring a posting. OMB has decided that FPDS shall be the data source for contracts. To meet these requirements the accuracy, integrity, reliability and timeliness of the FPDS data needs to be substantially improved so that the information provided to the single searchable database will be an authoritative source that allows agency managers, contractors, and policy makers to make informed decisions and the general public to see how their tax dollars are being used.

The Administrator, Office of Federal Procurement Policy (OFPP) has issued policy that requires agency Chief Acquisition Officers (CAOs) to establish requirements for ensuring that FPDS data is accurately and timely reported and reflects contract file information. Key elements of that policy include: establishment of agency-wide processes to assure routine review of FPDS data entries, including the use of statistically-valid data sampling techniques for verification and validation of that data; and, clear assignment of data verification responsibilities.

To enable annual agency certifications, reviews must be conducted on an ongoing basis by an organization or person that did not award the contracts being reviewed. An annual agency certification of the accuracy of its FPDS data must be provided to GSA, and the Administrator, OFPP, as part of the FY 2007 data confirmation process. Annual certifications are due to GSA and OFPP by December 15 of each year.

POLICY: To ensure the accurate and timely input of data into FPDS as well as verification and validation of that data, Bureau Procurement Chiefs must establish the necessary policies and procedures to achieve that end. At a minimum, the following procedures will be implemented:

1. Contracting officers are the individuals primarily responsible for the accuracy of data to be submitted to FPDS. Strong consideration should be given to incorporating this responsibility into individual performance work plans.
2. Contract writing systems capable of reporting directly into FPDS shall be configured to do so as a condition of making an award.
3. Contract writing systems that are not capable of reporting directly to FPDS, must report their data utilizing the FPDS web-based interface not later than 14 days after an award is made. To ensure data entry and accuracy, reports of actions awarded shall be routinely generated from the contract writing system, examined and compared to data contained in FPDS, to assure that those actions have been individually reported to FPDS.
4. Organizations without a contract writing system must report their data utilizing the FPDS web-based interface not later than 30 days after an award is made. To ensure data entry and accuracy, logs of contract actions must be regularly reviewed and compared to data entries in FPDS.
5. Data Certification: Bureau Procurement Chiefs must conduct reviews of sufficient depth and frequency to allow them to verify the accuracy of their data and ensure that their contract awards have been entered into FPDS within the appropriate time frame. The review process should include procedures such as statistically valid data sampling, comparisons of contract file data to FPDS data entries, and comparing print outs of FPDS data to their contract writing system data for accuracy.

Bureau Procurement Chiefs shall provide certifications of the accuracy, timeliness and validity of their FPDS data on a quarterly basis to the DOJ Senior Procurement Executive (SPE).

Certifications to the SPE must include a description of the means used to verify the accuracy and completeness of the data and a statement that all discrepancies found have been corrected.

6. Training: Bureau Procurement Chiefs must assure that contracting officers/data entry personnel are sufficiently trained and adjust that training, as appropriate, based on review findings.

7. Departmental Review: The Procurement Policy and Review Group (PPRG) will provide an independent verification and validation of the bureaus FPDS data entries. Reviews will be regularly performed by generating and evaluating reports from FPDS. The results of those reviews will be provided to the bureau procurement chiefs.

The DOJ SPE will provide the annual certification of the department's FPDS data to GSA and OMB. This certification will be made based on bureau reviews and certifications and PPRG reviews of the bureau's FPDS data.

The first certification shall be for the quarter ending June 30, 2007. This and subsequent certifications are due not later than 14 days after the end of the quarter.

Your continued attention to the accuracy of federal procurement data is critical and must be a top priority for all personnel. We must have accurate and timely procurement data for us to manage the mission-critical contracting function. Your leadership is essential to solve this problem. Thank you for your cooperation on this very important matter. If you have any questions, please contact H.B. Myers on 202/616-3758.