

Office of Acquisition and Property Management

June 16, 2004

Department of the Interior Acquisition Policy Release (DIAPR) 2004-07

SUBJECT: Ensuring Accurate Procurement Data Reporting to the FPDS-NG

1. *Purpose:*

To better ensure data accuracy and to establish certification requirements for bureau submissions to the FPDS-NG.

2. *Effective Date:*

This DIAPR is effective upon issuance.

3. *Expiration:*

This amendment remains in effect until canceled or superseded.

4. *Background and Explanation:*

As part of a July 15, 2004, joint hearing on Government Support of Disabled Veteran-owned Businesses, the Small Business Administration reported that the Federal Procurement Data System (FPDS) understated the number of women-owned businesses participating and the procurements going to them as well as seriously under-reported veteran-owned firms actually doing contract work for us. Our follow-up data review led us to conclude that approximately 2-3 % of our FY 2003 transactions misclassified vendors as small businesses when they were large or vice-versa.

Our current emphasis on attaining a 3% goal in FY 2005 in awards to Service-Disabled Veteran-owned Businesses further calls for a major focus on accuracy in the related data. Increased attention is being paid by the private sector to the data in the Federal Procurement Data System – Next Generation (FPDS-NG). Taken together, these issues compel us to do a thorough, complete and accurate job for our part of Federal procurement data collection to ensure its maximum utility to its many users, including agency program and administrative managers.

Finally, particular attention must be paid to the business size determination. If the reporting official reports a small business vendor as large business, none of the subordinate socioeconomic data (woman-owned, HUBZone, etc.) will be recorded in SBA reports, thus reporting errors are compounded. Many vendors fit multiple socioeconomic categories (small business, woman-owned, veteran-owned, HUBZone, etc.) and each category must be reported, where applicable, for every vendor.

5. Action Required:

a. Reporting of all actions must be done by the responsible Contracting Officer, Contract Specialist or Purchasing Agent, or other personnel who are fully trained in all subjects involved in the reporting process and able to efficiently and accurately determine the correct response to all data issues. Where such training is not yet completed, the reporting individual will be closely supervised by a fully-trained procurement official.

b. Particular attention must be paid to the accuracy of each and every data element submitted by reporting and reviewing personnel, especially including business size status and all socioeconomic information, such as Service Disabled Veteran Owned Businesses (SDVOB).

c. Each bureau shall establish a procurement data quality control plan involving, as a minimum, periodic (no less than quarterly) reviews of data in the FPDS-NG from your bureau and spot-checks of specific data elements in random-sampled transactions to determine accuracy. If deemed appropriate, the Department will coordinate with bureau representatives to establish a quality control guideline or template for these purposes. A goal of 1% or less errors in transactions (number of transactions with errors divided by the total number of transactions reported) must be included for FY 2005 and reduced continuously over coming years.

d. Each bureau procurement chief shall submit to the Director, PAM, a certification of the completeness, currency and accuracy of the prior fiscal year data, no later than November 30 of each year. The certification should confirm that all reports were completed by a responsible procurement professional or a person fully trained and knowledgeable regarding the report. The certification should further quantify and explain:

a. any known errors or unresolved anomalies remaining in the data,

b. the best possible quantification of current error rates,

c. goals for the current fiscal year, and

d. steps being taken to further improve the quality (completeness and accuracy) as well as the timeliness of the data.

Questions on these issues may be directed by e-mail or phone to Wiley Horsley (202-208-3347) or Kate Oliver (202-208-3345).

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