

## Agency FPDS Data Quality Report

**Agency Name:** US Nuclear Regulatory Commission

**Fiscal Year of FPDS Data:** 2009

### **Agency Data**

Number of Contracting Offices Providing Data to FPDS: 5

Total Procurement Obligations for this fiscal year: \$210,531,988

### **Part I - Data Quality Certification**

#### **Certification Statement**

I certify that 94.3% of all reportable contract actions awarded during FY 2009 for my agency have been entered into FPDS as fully and accurately as possible as of the date of my signature. [Agencies unable to certify entry of 100% of their reportable contract actions must discuss the reasons for this and their plans to remedy this situation under the following section of this Part.]

#### **Explanation of Data Missing from Certification**

*The 6.7% of actions that are not certified are currently being corrected in FPDS. The corrections should be completed by the end of February 2010. The corrections will be checked for accuracy to ensure 100% certification of data at that time.*

### **Part II - Assuring Data Input Accuracy**

Agencies' efforts to assure the input of high quality procurement data typically fall into three broad groups of activities. The first two groups consist of activities intended to: (1) assure that accountability for data accuracy is clearly defined and properly assigned, and (2) implement quality controls over data input. The third group consists of other measures that agencies may take to monitor and improve their data quality on a routine basis. Please discuss your agency's activities to assure data input accuracy according to the following outline along with any other points you want to include.

#### **Accountability for Data Accuracy**

1. Address whether or not data quality was included as a critical element, included but not as a critical element, or not addressed in the performance evaluations of contract specialists, contracting officers, heads of contracting activities, senior procurement executives, and chief acquisition officers.

*Data quality was not included as an element in performance evaluations of contracting staff.*

2. Describe any other ways in which personnel in the agency and its subordinate components were held accountable for ensuring FPDS data accuracy.

N/A

Enclosure

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3. Discuss any barriers or challenges that your agency faced in implementing accountability for data accuracy throughout the agency, and any steps that the agency has taken, or is planning to take, in FY 2010 to improve such accountability.

*In FY 2010, with the upcoming implementation of a new financial system, followed closely by a new contract writing system, data integrity is being stressed at all levels of the organization to ensure that all contracts-related data (not just FPDS data) is accurate for migration purposes.*

Controls over Data Input

1. Provide the percent of the agency's FPDS contract action reports (CARs) entered directly from each contract writing system(s) used by the agency, the percent entered directly into FPDS through the web portal, and the percent entered by any other methods during this fiscal year:

a. Contract Writing System(s) (Identify name and version)

*Distributed Solutions, Inc. Automated Acquisition Management Solution (AAMS) 100%*

b. Web Portal (On-line login)	_____ %
c. Other	_____ %
Total	100 %

If applicable, please describe any "Other" method(s) used:

2. Identify the positions (e.g., contracting officer, contract specialist, clerk, etc.) of the individuals that **entered** the CARs into FPDS, by checking all that apply.

- |   |              |
|---|--------------|
| a. Federal employee - contracting officer     | <u>  X  </u> |
| b. Federal employee - contracting specialist  | <u>  X  </u> |
| c. Federal employee - data entry clerk        | _____        |
| d. Federal employee - other. Please specify   | _____        |
| _____   |              |
| e. Contractor - program manager/key personnel | _____        |
| f. Contractor - data entry clerk              | _____        |
| g. Contractor - other. Please specify         | _____        |

3. Identify the positions (e.g., contracting officer, contract specialist, clerk, etc.) of the individuals that **approved** the CARs entered into FPDS, by checking all that apply.

- |   |              |
|---|--------------|
| a. Federal employee - contracting officer     | <u>  X  </u> |
| b. Federal employee - contracting specialist  | _____        |
| c. Federal employee - data entry clerk        | _____        |
| d. Federal employee - other. Please specify   | _____        |
| _____   |              |
| e. Contractor - program manager/key personnel | _____        |
| f. Contractor - data entry clerk              | _____        |
| g. Contractor - other. Please specify         | _____        |

4. Discuss the type and frequency of procurement and FPDS training provided to personnel who enter CARs into FPDS.

*All Division of Contracts personnel received refresher training on FPDS in early FY2009. During this training, personnel were provided with a "cheat sheet" to assist with definition of each required field, to be used as a quick reference guide while entering data into the contract writing system or FPDS. The FPDS user manual was also provided for more detailed item research. Going forward, the "cheat sheet" will be updated as changes are made to FPDS, and training will be provided on a recurring basis to address fields that are commonly miscoded.*

5. Identify whether all data elements in all CARs had to pass the FPDS edits before the corresponding awards could be issued by the agency's contract writing system. If only some data elements or some CARs were subject to the FPDS edits, identify them.

*The contract writing system relies on the validations in the FPDS system. There are no built in validations in the contract writing system.*

6. Discuss any other procedures, e.g., internal controls, used by the agency to ensure that data entered into contract writing systems and FPDS were correct when entered.

*Data is reviewed by the cognizant Contracting Officer prior to approval and award. This helps to ensure accuracy by providing a second look at the data entered by the Contract Specialist.*

7. Discuss any barriers or challenges that your agency faced in establishing effective controls over the accuracy of data going into FPDS, and any steps that the agency is planning to take in subsequent fiscal years to establish such controls.

*A proposed multi-tier review system for contract actions is currently being reviewed by both Division of Contracts management and the Office of General Counsel's management. These reviews would provide even more reviews of the data being entered into FPDS, reducing the likelihood that any mistakes could become finalized in the system.*

#### Other Data Quality Assurance Procedures

Discuss any other procedures used by the agency on a routine basis during the year to review the accuracy of its procurement data in contract writing systems and/or FPDS and to correct any errors found. Discuss separately any other such procedures that the agency is planning to implement in subsequent fiscal years. Examples of such procedures might include:

*Contract Specialists and Contracting Officers were required to independently review the applicable FPDS data for each acquisition action (awards and modifications) and certify that the data was accurate and complete. The Contracting Officers reviewed, prior to an action being awarded, all FPDS data collected in the NRC contract writing system. All Division of Contracts (DC) staff was tasked with reviewing 100% of their own FPDS data.*

*In addition, periodic anomaly reports were run from FPDS throughout the fiscal year, so that contract specialists and contracting officers had the opportunity to review data for accuracy and make necessary corrections.*

### **Part III - Measuring and Reporting Data Accuracy**

There are four factors that affect the quality of the data accuracy results reported on the Attachment to this Exhibit. The first two deal with the independence and qualification of the persons who review the FPDS records and contract files. The second two deal with the scope and adequacy of the review process itself. Please discuss your agency's policies and procedures for measuring and reporting the accuracy of your FPDS data according to the following outline along with any other points you want to include.

#### **Independence of Reviewers**

1. Discuss whether the persons who reviewed and validated the FPDS data were government employees, contractors, or a combination thereof.

*All of the staff members who reviewed and validated the FPDS data were government employees.*

2. Were all sampled contract action reports (CARs) validated against the associated contract files by individuals other than the persons who entered the contract data for those CARs 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 the OFPP guidance that address the independence issue.

*Yes, the actions were only reviewed by personnel not associated with the contracts being reviewed. Staff members from both the Procurement Oversight Team and Procurement Policy Team conducted the reviews.*

3. Discuss any changes that the agency plans to make with respect to this issue in subsequent fiscal years.

*A contractor has been brought on board to do general contract oversight reviews of larger awards. Data validation and verification will be an element to their overall file reviews. These reviews will not replace the validation and verification reviews performed specifically for this exercise, they will just be used as supplemental reviews.*

#### **Qualifications of Reviewers**

1. Describe the qualifications reviewers were required to have with respect to contracting experience and FPDS.

*All of the reviewers, with one exception, have hands on contracting experience and experience entering data into FPDS.*

2. Describe any special training on Federal procurement rules and procedures that was provided to the reviewers.

*None.*

3. Describe any special training on FPDS that was provided to the reviewers.

*For the one reviewer who is not familiar with FPDS, the team provided her with background on each field being reviewed, and where to find the information in both FPDS and the contract file.*

4. Discuss any changes that the agency plans to make with respect to this issue in subsequent fiscal years.

*None.*

#### Scope of Review

1. Describe whether the contract action report population from which the sample was selected included:

- a. All transaction types (e.g., modifications, delivery orders, etc.);
- b. All components of the agency that submit contract action reports to FPDS;
- c. Data from all four quarters of the fiscal year; and
- d. Transactions funded from non-appropriated funds. [NOTE: Transactions from non-appropriated funds should not be reported to FPDS unless approved by the GSA FPDS Program Office.]

*The contract action population from which the sample was selected did include all contract types, all components of the agency that submit actions to FPDS, and data from all four quarters of the fiscal year.*

2. Describe whether your agency validated at least all data elements identified in the OFPP guidance. If it did not, discuss why.

*All of the data elements described in the OFPP guidance were reviewed.*

3. Identify any additional data elements reviewed beyond those requested in OFPP guidance.

*N/A*

4. Describe whether the agency reviewed all the records identified in the sample.

*All of the records identified in the sample were reviewed.*

5. Discuss any changes that the agency plans to make with respect to this issue in subsequent fiscal years.

*In FY 2010, in order to reduce the burden on the reviewers, the reviews will be conducted quarterly using an estimated number of transactions based on the FY 2009 numbers. Additional records will be added to the fourth quarter review to ensure that the proper confidence level is achieved.*

#### Adequacy of Review

1. Describe the sample design and methodology used to select the contract action reports for the sample. If the agency did not select a random sample of contract action reports, describe the sample selection method that was used and justify how the sample is providing useful information about the accuracy of data elements.

*A random sample was taken from all contract action reports.*

2. Identify whether the agency selected a sufficiently large sample to comply with the statistical precision standard requested by OFPP (i.e., a 95% confidence level of  $\pm 5$  percentage points around the accuracy rate), and provide the 95% confidence interval for the overall accuracy rate and the data element accuracy rates. If the requested standard was not achieved, explain why the current sample was used and why the standard could not be met.

*Using a sample size calculator, NRC determined that, based on a population of 2,648 records, a sample of 336 records had to be reviewed to achieve a 95% confidence level with a  $\pm 5\%$  confidence interval.*

3. Did your agency pull the sample and conduct its review at the overall agency level or at the component level? If at the component level, indicate the number of components that conducted reviews, whether the SPEs (or equivalent) at those components reported the confidence levels of their samples to you, and what those confidence levels were.

*The sample and review were conducted at the overall agency level.*

4. 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.

*Reviewers pulled the contract files and compared the data in the file for the specified record to what is in FPDS.*

5. Identify whether the review included additional steps to validate the FPDS data beyond a comparison to the contract file (e.g., logic tests of relationships among related data elements, anomaly reports, etc.). Describe the additional methods used.

*No additional methods were used for the FY 2009 review.*

6. Discuss any changes that the agency plans to make with respect to this issue in subsequent fiscal years.

*As mentioned in the previous section, these reviews will be conducted quarterly for FY 2010. This will allow for a more detailed analysis of the data beyond just a one to one comparison with the contract file. The details on this additional analysis will be developed as the year progresses.*

**Other Activities to Validate Data**

Please summarize any other activities performed by the agency to measure and report the accuracy of its FPDS data that aren't included in the discussion of the preceding four factors.

**Required Signature**

KATHRYN O. GREENE

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SENIOR PROCUREMENT EXECUTIVE NAME (Printed)

*/RA JamesCorbett for/*

12/30/09

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SENIOR PROCUREMENT EXECUTIVE SIGNATURE DATE