

Agency FPDS Data Quality Report

Agency Name: US Nuclear Regulatory Commission

Fiscal Year of FPDS Data: 2010

Agency Data

Number of Contracting Offices Providing Data to FPDS: 5

Total Procurement Obligations for this fiscal year: \$199,958,766.82

Part I - Data Quality Certification

Certification Statement

I certify that 82% of all reportable contract actions awarded during FY 2010 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 18% of actions that are not certified will be corrected in FPDS. The corrections should be completed by the end of the second quarter of FY 2011. 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.

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

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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 and FY 2011 to improve such accountability.

In FY 2010, the Division of Contracts (DC) provided training classes on specific data values in FPDS-NG to improve data quality. These classes will continue in FY 2011, and DC will be utilizing contractors to assist with data clean up to improve data quality in order to assist with migration of data to acquisition system that will be implemented by October 1, 2012.

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%
Version 7.4*

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 DC personnel received targeted training on FPDS on several occasions in FY2010. This training concentrated on problem areas discovered during the FY2009 FPDS data validation review. In addition, the NRC "cheat sheet", which was provided to staff in FY2009 to assist with definition of each required field, was updated and distributed several times over the course of the year. It is also posted on an internal website for easy reference at any time. The FPDS user manual was also provided for more detailed item research.

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. In FY11 NRC is scheduled to award a contract for a new contract writing system with required pre-award validation.

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 review of 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 new contract writing system with pre-award validation checks will be implemented in FY12/13. In addition a proposed multi-tier review system for contract actions is currently being reviewed by both DC 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.

The review and validation of NRC's FPDS data was conducted by contractor personnel. Review of the contractor's findings was done by 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.

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

As a follow on activity, the contractor who conducted the reviews of the FY2010 data is writing Standard Operating Procedures (SOPs) for staff to follow when entering data in AAMS, which ultimately flows into FPDS. Additionally, the contractor will have staff available onsite to provide desk-side support to contract specialists as questions regarding proper data entry procedures arise.

Qualifications of Reviewers

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

All of the reviewers have hands on experience conducting this same review at other federal government agencies.

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.

None.

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.

Going forward, and assuming that funds are available, NRC will continue to use contractor staff to perform this review. Their review is objective, and the contractor has tools that can be used to perform the reviews more quickly than if they were performed in-house by NRC staff. In-house government employee resources are not sufficient to perform the same level of review as the contractor can provide.

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 ± 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.

NRC selected a statistically valid sample at the data element/field level for each data element required to be audited. The statistical sampling was conducted in a random manner and does adhere to the required precision standard of 95% with confidence level of $\pm 2.5\%$ rather than 5%. The confidence interval is provided for in the data element accuracy rate and in the overall accuracy rate.

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 2010 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, assuming that funds are available, NRC will be working with the contractor to develop a more proactive approach to these reviews in FY2011.

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
SENIOR PROCUREMENT EXECUTIVE NAME (Printed)

Robert Weber for 12/29/10
SENIOR PROCUREMENT EXECUTIVE SIGNATURE DATE

Agency name: Nuclear Regulatory Commission

Fiscal Year of FPDS Data: FY10

Data Element CAR Accuracy Rate: 82%

Percent of Total Procurement Spend covered by sample: 47.5%

Accuracy Computation for Key Data Elements

Systemic Causes of Invalid Data

Data Element Name	(Column A) No. of Records Reviewed	(Column B) No. of Correct Records	Column B/ Column A as % Accuracy Rate	(Check all that apply)		
				User	FPDS	Other
2A Date Signed	1351	1244	92%	X		X
2C Completion Date	1282	994	78%	X		
2D Est. Ultimate Completion Date	1267	928	73%	X		
2E Last Date to Order	108	66	61%	X		
3A Base and All Option Value	1351	1150	85%	X		
3B Base and Exercised Option Value	1282	810	63%	X		
3C Action Obligation	1282	1201	94%	X		
4C Funding Agency ID	1351	1293	96%	X		
6A Type of Contract	657	602	92%	X		
6F Performance Based Service Acquisition	657	542	82%	X		
6M Description of Requirement	1351	1225	91%	X		
8A Product/Service Code	657	598	91%	X		X
8G Principal NAICS code	362	185	51%	X		X
9A DUNS No	364	350	96%	X		
9H Place of Manufacture	467	377	81%	X		
9K Place of Performance ZIP Code (+4)	636	437	69%	X		
10A Extent Competed	399	246	62%	X		
10C Reason Not Competed	406	245	60%	X	X	
10D Number of Offers Received***	657	492	75%	X		
10N Type of Set Aside	655	580	89%	X		
10R Statutory Exception to Fair Opportunity	281	94	33%	X	X	
11A CO's Business Size Selection	362	321	89%	X		
11B Subcontract Plan	341	245	72%	X		
12A IDV Type	30	29	97%	X	X	
12B Award Type	627	607	97%	X	X	
Total Records Sampled	18183	14861	82%			

***This data element must be validated beginning with FY 2010 data, but is not required to be validated for the FY 2009 data.