



**DEPARTMENT OF DEFENSE**  
**FEDERAL PROCUREMENT DATA SYSTEM (FPDS)**  
**CONTRACT REPORTING**  
**DATA IMPROVEMENT PLAN**

**Version 1.4**

**Dated January 5, 2011**

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## **1.0 Purpose**

This serves as the Department of Defense's (DoD's) Plan for continual improvement of the contract data reported to the Federal Procurement Data System (FPDS). As the Department matures in its use of enterprise business intelligence, this plan may be incorporated into a broader procurement data improvement package.

## **2.0 Background**

On October 7, 2009, Office of Federal Procurement Policy (OFPP) issued a memorandum requiring additional steps to verify and validate the accuracy of data in FPDS. Since FY07 OFPP has required each Chief Acquisition Officer (CAO) to establish requirements to ensure that the FPDS contract data is reflected accurately and timely. At a minimum, OFPP asked that the CAOs shall:

- Establish a Department-wide requirement for routine, statistically-valid data verification and validation (V&V).
- Provide certification of data accuracy and completeness to OFPP each year, as will be required in an upcoming FAR case specifically designed to clarify FPDS roles and responsibilities.
- Assign clear data verification responsibilities.
- Make necessary adjustment to policies, procedures, and training, as needed.
- Provide the Administrator of OFPP an annual statement certifying the completeness and accuracy of DoD data including the verification and validation results of procurement data, a description of activities to assure data input accuracy, and a summary of its policies and procedures for measuring and reporting data accuracy by January 5<sup>th</sup> of the year following the end of the fiscal year being certified.

This plan incorporates the latest OFPP requirements (as of the October 7, 2009 OFPP memorandum) and provides instruction to the Components for completion of tasks to support the continual data accuracy improvement effort through fiscal year 2011.

## **3.0 Department Roles & Responsibilities**

### **Defense Procurement and Acquisition Policy (DPAP)**

1. Maintain this plan and update yearly; provide timely annual update for the coming fiscal year to Components and to OFPP as requested.
2. Establish quarterly and annual scorecards for Office of Secretary of Defense, Acquisition Technology and Logistics (OSD/AT&L) leadership based on FPDS data and Components' reports.

3. Review Component data V&V reports, with assistance as needed from the Business Transformation Agency (BTA) Federal Implementation team and Defense Manpower Data Center (DMDC), and approve the recommendations and proposed corrective action plans.
4. Track accuracy trends by Component and by data field.
5. Provide overall DoD annual certification of data accuracy and completeness to OFPP according to Components' certifications and data V&V results.
6. Serve as the Department's lead representation to the federal FPDS Change Control Board (CCB) and other related groups.
7. Periodically test the Component data V&V testing procedures as part of the DPAP evaluation process.
8. Establish and provide routine anomaly reports to the Components to identify potential errors or trends to be reviewed and addressed.
9. Establish DoD enterprise business intelligence capability for procurement data with assistance from the Business Transformation Agency (BTA); develop and make available to the Components additional reports as they are identified that may be used to improve FPDS data accuracy.

#### **Defense Manpower Data Center (DMDC)**

1. Develop and periodically make available to DPAP and Component leads small business and socio-economic anomaly reports using comparisons of FPDS data with extracted Central Contractor Registration (CCR) data.
2. Freeze, aggregate, and maintain DoD contracting data concurrently with quarterly Component certifications. The FY 2011 schedule is:
  - Q1 – February 28<sup>th</sup>
  - Q2 – May 31<sup>th</sup>
  - Q3 – August 31<sup>st</sup>
  - Q4 – January 5<sup>th</sup>
3. Develop and periodically make available to DPAP and Component leads a competition anomaly report and the reports listed in Section 4, Step 8 of the V&V process.
4. Develop and periodically make available to DPAP and Component leads a status of actions report identifying draft records in the system.
5. Develop and make available to DPAP and Component leads a monthly summary report of contract actions reported (fiscal year to date) to FPDS compared against the prior fiscal year.
6. Coordinate with and support Component Leads, BTA, and GSA (as necessary) for complex corrective actions plans.

#### **Business Transformation Agency (BTA)**

1. Coordinate with and support Component Leads, DMDC, and GSA (as necessary) for complex corrective actions plans.

2. Develop and periodically make available to DPAP and Component leads additional reports as they are identified in the enterprise business intelligence effort sponsored by DPAP that may be used to improve FPDS data accuracy.

### **Components (Services & Agencies)**

This section applies to each Component that has procurement authority and is reporting to FPDS – see attached list.

1. Develop and maintain an FPDS Contract Reporting Data Improvement Plan (known further as “Plan” in this document) for the Component that incorporates the requirements of this Department plan and any additional requirements pertinent to that Component. Provide notification that any Component-level plan developed prior to FY 2011 has been re-evaluated and changed where necessary to accomplish data V&V and certification for FY 2011 data to DPAP’s Program Development and Implementation (PDI) directorate by January 14, , 2011. Failure to notify PDI of changes to the existing plan will imply that no changes are necessary and the FY 2011 plan will rely upon those principles and instructions originally outlined in previous years.
2. Incorporate data accuracy reporting objectives in procurement personnel’s performance plans.
3. In accordance with the instruction provided by OFPP, ensure 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. Components shall ensure that only personnel that are familiar with DoD contracting processes and reporting to FPDS conduct the V&V reviews. Address these efforts in the submitted Plan.
4. Provide status of prior quarter’s reporting progress to DPAP at the time V&V results are due (see dates specified in Component responsibility number 5). Components should address the status of reporting in each quarters’ Reporting Summary required in Step 9, item number 7 of section 4.0.
5. Conduct data V&V each year in accordance with the data V&V process described in section 4.0 and provide quarterly results to DPAP/PDI.
  - Quarterly results and certifications are due 45 days from quarter-close (with exception to Q4 results for purposes of submitting to OMB on-time). The FY 2011 schedule is as follows:
    - Q1 – February 15<sup>th</sup>
    - Q2 – May 16<sup>th</sup>
    - Q3 – August 15<sup>th</sup>
    - Q4 – December 2<sup>nd</sup>
6. Provide the Senior Procurement Executive’s annual certification of the prior fiscal year’s reported data to DPAP by December 2<sup>nd</sup> 2011.
  - Annual summaries of V&V results are due with the Senior Procurement Executive’s certification by December 2<sup>nd</sup> (see section 4.0, Step 9, for required documentation).

7. Implement DPAP and Component agreed-upon corrective action plans as identified in the Data V&V Report and regularly communicate implementation status to DPAP and DMDC.
8. Develop and utilize preventative maintenance procedures, to include routine review of DPAP provided anomaly reports Component-developed anomaly reports, to improve in FPDS data accuracy.

#### **4.0 Data Verification & Validation (V&V) Process**

Each Component with procurement authority that reports contract data to FPDS shall follow the Data V&V Process steps as identified below:

**Step 1: Review the list of Key Data Elements to be assessed.** DPAP will supply the Components with the document (MS Excel Spreadsheet) that includes all of the required FPDS data elements to be reviewed by the Components (hard copy is found at Exhibit B). This document will indicate per data element, the applicable FPDS data entry use case scenario and provide an explanation of the verification to be performed. Data elements that are unable to be validated due to missing documentation must be considered inaccurate. Only data elements appropriate for the type of record (or “use case”) being validated should be counted in computing the accuracy rate. Each data element listed in Exhibit B shall be reviewed for accuracy when it is included on the FPDS contract action report (including those brought forward on a Delivery/Task Order, BPA Call, or Modification from a base record). For further definitions of what constitutes data accuracy, please see DoD Exhibit E – Agency FPDS Data Quality Certification, Attachment 1, Definitions - Data Element Accuracy Rate.

**Step 2: Determine the method of conducting data V&V and statistically valid sample sizes.** Each Component shall determine its own statistically valid method of verifying and validating the data elements indicated in the document provided in Step 1 for FPDS contract action reports (CARs) against the actual contractual actions accomplished, and describe it in the Component’s Plan. Components shall certify in their reports that any sampling conducted is accomplished randomly from a population of FPDS records that includes all of the FPDS use cases (i.e. transaction types) employed by the Component; and that the sample size is sufficient to produce statistically valid conclusions at the 95% confidence level, with an error rate of no more than +/- 5% per assessed data element per use case. An accuracy rate per data element of 95% shall be the goal used in computations. The Military Services and Defense Logistics Agency shall develop a sample size per major command per year based on the previous year’s total actions reported per major command to FPDS. The other Defense Agencies shall develop the sample size based on their agency’s total actions reported to FPDS during the previous year. The year’s sample size may then be divided by four to determine the number of actions per quarter that must, at a minimum, be reviewed. All Components shall additionally ensure that the sample reviewed during the year includes actions from each reporting DoDAAC. Each Component shall consider every FPDS reportable transaction, according to FAR Subpart 4.6 parameters, they award per assessment period

as part of the baseline population for determining sample size for that assessment period. Component business intelligence and contract writing systems may be used as the primary means to accomplish data V&V efforts. Component Plans must address any deficiencies in their abilities to conduct data V&V on each required data element from Step 1 and plan and schedule for addressing this deficiency.

**Step 3: Establish the personnel to perform the data V&V activities.** Once the data V&V method is chosen, each Component shall ensure personnel assigned to conduct the data V&V throughout the Component's hierarchy are independent from the personnel that originally submitted the data in FPDS. Components shall identify their lead representative(s) and for data V&V in their Plans.

**Step 4: Identify missing records or other discrepancies between FPDS and Contract Writing System records.** Identify any records that have not been submitted to FPDS in accordance with the timelines established in the Federal Acquisition Regulation (FAR) Subpart 4.6 and perform root cause analysis leveraging prescribed OSD list of root causes (DPAP will begin to monitor reporting timeframes across the enterprise using business intelligence reports). Develop corrective action plans and a routine schedule for monitoring instances such as late or missing CARs to mitigate the number of occurrences in the future. Include these findings in the reports provided to DPAP. To proactively address missing CARs, Components shall review the Contract Action Reporting Scorecard disseminated by DPAP. This report measures the percent of reporting compliance (per office) according to volume of actions submitted to the DoD's Electronic Document Access (EDA) system.

In addition, provide status of corrections to CARs identified in anomaly report 2.2 as having reported DFAS as the funding Agency on non-DFAS issued contract actions (see Exhibit D for instructions on how to build the ad hoc report). Please note, if your organization is not listed, no action is required.

**Step 5: Perform data V&V reviews.** Data V&V reviews, at a minimum, shall include each of the FPDS data elements identified in the document provided in Step 1. For each CAR determined from Step 2, data V&V reviews shall compare the data contained within each data element in FPDS with that from the actual contract file/action.

The OFPP memorandum (October 7, 2009) identified the 25 data elements below to be reviewed for FY 2011. Additional fields may be reviewed at the initiative of each Component. The number associated to each field name below is the FPDS Data Dictionary element number; definitions and formats are available in this document, located [here](#).

1. 2A Date Signed
2. 2C Completion Date
3. 2D Est. Ultimate Completion Date
4. 2E Last Date to Order
5. 3A Base and All Option Value

6. 3B Base and Exercised Options Value
7. 3C Action Obligation
8. 4C Funding Agency ID
9. 6A Type of Contract
10. 6F Performance Based Service Acquisition
11. 6M Description of Requirement
12. 8A Product/Service Code
13. 8G Principal NAICS Code
14. 9A DUNS Number
15. 9H Place of Manufacture
16. 9K Place of Performance Zip Code (+4)
17. 10A Extent Competed
18. 10C Other than Full & Open Competition (formerly known as Reason Not Competed)
19. 10D Number of Offers Received
20. 10N Type of Set Aside
21. 10R Statutory Exception to Fair Opportunity
22. 11A CO's Business Size Selection
23. 11B Subcontract Plan
24. 12A IDV Type
25. 12B Award Type

Components shall also review the following two data elements to address high-priority DoD data items:

1. 6E Multiple or Single Award IDC
2. 10M Solicitation Procedures

**Step 6: Perform root-cause analysis and document the field as inaccurate.** If the field is found to be inaccurate or inappropriately incomplete (based on the definitions outlined in Step 1 and provided in Exhibit E), perform root cause analysis, including the contracting officer for the action as appropriate. If satisfactory root cause cannot be determined, the field will be documented as an error, with the root cause identified as "Other". If "Other", provide brief short-name description of the root cause. When the root cause has been determined, the error shall be documented with the appropriate root cause (listed in Exhibit C) and provide a corrective action plan where the target goal is not achieved and routine schedule for addressing any repetitive errors.

Corrective actions should attempt to address not just the immediate fix of a data error, but to address the root cause of the error in order to minimize the possibility of the error to reoccur. Corrective Actions might include, but are not limited to:

- Improving core processes, to include improvements in collecting the source data in the contract writing system
- Recommendations for alterations to the validation rules contained within the contract writing system or FPDS or interfaces between each system
- Required Policy

- Training / Awareness
- Performance Metrics for Contracting Offices

It is noted that some of the required data elements to be reviewed are completed in FPDS CARs by FPDS itself based on information from other authoritative sources (e.g., CCR or previous CARs submitted by other contracting offices). Associated errors found during data V&V should be highlighted in the reports submitted to DPAP, as well as reported to the FPDS Helpdesk as soon as possible (as necessary) to affect their correction.

**Step 7: Correct errors.** Upon documentation of the error, root cause of inaccuracy, and corrective action plan; accomplish correction actions to the CARs with errors (this requires the FPDS “CORRECT” system privilege). These corrections, if not correcting a systemic error across the Component or Department, should be accomplished as low in the Component’s hierarchy of organizations / offices as the CORRECT privilege is delegated, and should always be accomplished with the contracting officer’s knowledge. In the case of Defense Agencies without the CORRECT privilege, contact the DoD System Administrator to gain privileges. All errors must be corrected after they are documented with an appropriate root cause and corrective action plan.

**Step 8: Review anomaly reports.** In addition to reviewing the required data elements, each Component shall review anomaly reports made available on a routine basis and perform corrections as required. This will serve as the Department’s continuous form of preventative maintenance throughout the fiscal year. Each Component shall follow steps 6-7 of the data V&V process for all discrepancies and/or problems identified. Components are also encouraged to develop anomaly reports at the office, command, or component-level that address issues of concern to the Component. The list of DoD Anomaly Reports that will be provided to the Components routinely as results warrant, and their respective attributes and filters is included in Exhibit D. These reports include:

- **Reports Displaying Errors:**
  - CCR Exceptions:
    - Coded Purchase Card Only
    - Coded Purchase Card Only but Purchase Card Not Checked
    - Coded Deployed Military Operations and Place of Performance is USA
    - Coded Foreign Vendor and Place of Performance is USA
    - Coded Classified
    - Micro-purchases Greater than \$3,000
  - Base and All Options = \$0 (DCA, PO, DO, IDC)
  - Competition Nulls
    - Extent Competed is Null
    - Fair Opportunity is Null (Delivery Orders)
    - Fair Opportunity is Null (Part 8 BPAs/BPA Calls)
    - Number of Offers is Zero or Null
  - Completion Date is less than Date Signed (Excludes Specific Reasons for Modification to Focus on Ambiguous Ones)

- Estimated Ultimate Completion Date is less than Date Signed (Excludes Specific Reasons for Modification to Focus on Ambiguous Ones)
  - IDC Last Date to Order is less than Date Signed (Excludes Specific Reasons for Modification to Focus on Ambiguous Ones)
  - Contracting Officer's Business Size Determination
    - CO's Size Determination is Blank
    - Vendor is Government but CO's Size Determination is Small Business
    - Foreign Located Vendors but CO's Size Determination is Small Business
    - Vendor is UNICOR but Contracting Officer's Size Determination is Small
  - Contract Value is Greater than \$550,000, but Treasury Account Symbol is Null
- **Reports Displaying Potential Errors:**
    - Obligations & Deobligations Greater than \$1B
    - Program/Funding Agency = DFAS (DoD Awarded only, excluding DFAS)
    - Product/Service Code is Miscellaneous
    - NAICS is Soybean Farming (111110)
    - Vendor is a Hospital but CO's Size Determination is Small Business
    - Vendor is Education Institution but CO's Size Determination is Small Business
    - Vendor is a Government Top 20 Vendor but Contracting Officer's Size Determination is Small (a.k.a., the 'Big Guys')
    - Type of Contract is Null

**Step 9: Provide Data V&V Reports to DPAP/PDI.** Each Component shall report the results of the data V&V, including those errors discovered by reviewing provided anomaly reports to DPAP/PDI in accordance with the identified schedule in Section 3.0. Reports will be shared with the Office of Small Business Programs (OSBP). Reports shall capture the number of errors, error rates per field, and the predominant root cause of the errors relating to the elements that are mandated to be reviewed. DPAP is researching the capability to provide a single on-line portal for each of the twenty-three Components to use and submit their quarterly results. Documentation related to this capability may be provided as an additional exhibit to the plan, but will not change the manner in which V&V is conducted as stated throughout the plan.

Each Component shall report the results of the Quarterly Assessments in the following format:

**Cover sheet shall include:**

1. Name of Component

2. Data V&V Period (Quarterly)
3. Name(s) and contact information of those who predominantly prepared the report

**Report Summary shall include:**

1. Number of contracting offices (per DoD Activity Addressing Code (DoDAAC) identified in FPDS as an active contracting office that may provide data to the system).
2. How samples of FPDS records were selected and how statistical validity of the sample was determined.
3. Total obligations (\$ in Millions) and number of CARs expected to be submitted to FPDS during the data V&V period.
4. Total obligations (\$ in Millions) and number of CARs submitted during the data V&V period.
5. Total number of CARs verified and validated (sample size), and the sample size's total obligation value (sampling chosen from step 2).
6. Percent of total obligation value and total number of actions, based on the period, for which the sample size represents.
7. List of identified discrepancies between the number of records contained within FPDS and the contract action data discovered in Step 4 of the data V&V process (e.g. CARs in draft and/or error status). Provide justification for discrepancies.
8. Number of errors found, out of the total number of fields reviewed and Accuracy Rates for each Key Data Element (e.g., if field 10N Type of Set Aside, 12 errors were recorded among the X (50) number of CARs identified in step 2, the calculated ERROR percentage would be 12 divided by 50, equaling 24%. This would mean that 76% percent of the data is accurately stated in that field.)
9. Summary of OSD root cause(s) of errors (please summarize for recurring errors) shall be covered for each type of determined root cause.
10. Corrective actions planned that include an established routine schedule to minimize the number of errors or discrepancies, including due dates and action owners. Please correlate the corrective action plan to its respective root cause(s).
11. Recommendations to DPAP for improvements to FPDS (or other authoritative data sources) to further data accuracy.
12. Recommendations to DPAP for improvement of the data V&V process and policy.

Note: For step 8 above, Blanket Purchase Agreements (BPAs) and Basic Ordering Agreements (BOAs) shall determine accuracy according to the choices available for Indefinite Delivery Contracts (IDCs) if the records were reported to FPDS in version 1.3. Orders against BPAs and BOAs shall determine accuracy according to the choices available for Delivery Orders if the records were reported to FPDS in version 1.3. For BPAs, BOAs, and orders against BPAs and BOAs submitted in version 1.4; use the BPA, BOA, BPA Call, and orders referencing BOAs use case requirements.

**Report Appendix shall include:**

1. Completed data V&V review worksheet, summarized at the overall Component-level. Components shall provide only one report that addresses all reporting DoDAACs within the Component.

**Step 10. Provide Annual Certification to DPAP.** Each Component shall provide DPAP its Senior Procurement Executive’s annual certification of the fiscal year’s reported data and a summary of data V&V efforts for the entire fiscal year. Components shall complete parts I, II, and III of OSD provided Agency FPDS Data Quality Certification (Exhibit E). The Annual Certification’s V&V summary shall consist of an aggregated version of the quarterly submissions and therefore shall succinctly address each of the 12 items from Step 9.

## 5.0 Exhibits

Exhibit A – Components with procurement authority reporting to FPDS (MS Excel document)

Exhibit B – Data Improvement Plan Worksheet (MS Excel document)

Exhibit C – Revised Root Cause Codes for FY11 (MS Excel document)

Exhibit D – Anomaly Report Roster and Ad Hoc Criteria (MS Word document)

Exhibit E – Agency FPDS Data Quality Certification (MS Word document)

Exhibit F – Total FY10 Actions Reported to FPDS per Command and Office (MS Excel document)

| Section Changed                   | Description of Change   | Date of Change | Changed By:  |
|-----------------------------------|---|----------------|--------------|
| Title Page                        | Changed document to Version 1.1 from Version 1.0 (July 2008);   | March 9, 2009  | Bill Maczees |
| Section 3, DMDC Roles             | Added Role 2, to incorporate the quarterly data freeze per the request of Mr. Assad;                              | March 9, 2009  | Bill Maczees |
| Section 3, Component Leads’ Roles | Added Role 3, to incorporate additional reporting of progress made toward completing the prior quarter’s actions; | March 9, 2009  | Bill Maczees |
| Section 3, Component Leads’ Roles | Revised due dates within Role 4, to reflect 45 day window to submit quarterly V&V results;                        | March 9, 2009  | Bill Maczees |
| Title Page                        | Changed document to Version 1.2 from Version 1.1 (March   | June 26, 2009  | Bill Maczees |

| <b>Section Changed</b> | <b>Description of Change</b>   | <b>Date of Change</b> | <b>Changed By:</b> |
|------------------------|--|-----------------------|--------------------|
|                        | 2009);   |                       |                    |
| Section 3, DMDC Roles  | Revised Role 3 to include the responsibility to provide monthly anomaly reports listed in Section 4, Step 8 of the V&V process;            | June 26, 2009         | Bill Maczees       |
| Section 4, Step 8      | Provided additional language to explain purpose and intent of the monthly anomaly report reviews;  | June 26, 2009         | Bill Maczees       |
| Section 4, Step 8      | Provided list of anomaly reports;  | June 26, 2009         | Bill Maczees       |
| Section 5, Exhibits    | Provide additional Exhibit D and revised the title of Exhibit C to reflect necessary changes made in March 2009;                           | June 26, 2009         | Bill Maczees       |
| Section 4, Step 8      | Listed two additional anomaly reports; Unicorn Vendors coded as small and "Big Guys" coded as small;                                       | July 13, 2009         | Bill Maczees       |
| Title Page             | Changed document to version 1.3 from v1.2.   | December 3, 2009      | Bill Maczees       |
| Section 2              | Update background to incorporate October 7, 2009 OFPP issued guidance.   | December 3, 2009      | Bill Maczees       |
| Section 4, Step 1      | Updated to reflect those elements not able to be validated, due to missing documentation must be counted as incorrect.                     | December 3, 2009      | Bill Maczees       |
| Section 4, Step 2      | Updated to reflect that only elements appropriate for the type of record being validated should be counted in computing the accuracy rate. | December 3, 2009      | Bill Maczees       |
| Section 4, Step 4      | Added language to further encourage use of OSD prescribed root causes, rather than OMB prescribed root causes (e.g. User, FPDS, Other).    | December 16, 2009     | Bill Maczees       |
| Section 4, Step 5      | Updated to reflect current list of   | December 16,          | Bill Maczees       |

| <b>Section Changed</b>                         | <b>Description of Change</b>  | <b>Date of Change</b> | <b>Changed By:</b> |
|--|---|-----------------------|--------------------|
|  | required elements to be reviewed.   | 2009                  |                    |
| Section 4, Step 6                              | Changed root cause determination “Unknown” to now be “Other”. Required short description of this determination.         | December 16, 2009     | Bill Maczees       |
| Section 4, Step 9                              | Clarified requirements of items 7 and 8 of the summary touch-points.  | December 16, 2009     | Bill Maczees       |
| Section 4, Step 10                             | Updated Annual Certification requirement to provide completed parts I, II, and III of Exhibit E.                        | December 16, 2009     | Bill Maczees       |
| Section 5                                      | Added Exhibit E (OMB Certification form) to the list of OSD Exhibits.   | December 16, 2009     | Bill Maczees       |
| Section 3<br>Component Roles                   | Added language to request Components that staff evaluations include criteria or component relating to data improvement. | January 14, 2010      | Lisa Romney        |
| Section 3,<br>Component Roles,<br>number 5 & 6 | Changed the due dates for Certifications and V&V results to be due at end of year.                                      | January 14, 2010      | Lisa Romney        |
| Section 4, Step 2                              | Changed guidance for sample size determination.   | January 14, 2010      | Lisa Romney        |
| Section 4, Step 9,<br>Report Summary           | Combined numbers 2 and 3 together into one requirement – resulting in 12 total requirements of the summary.             | January 15, 2010      | Bill Maczees       |
| Section 4, Step 9,<br>Report Summary           | Added Note to the section.  | January 20, 2010      | Lisa Romney        |
| Section 3,<br>Component Roles                  | Changed dates to reflect FY11 calendar.   | January 5, 2011       | Bill Maczees       |
| Section 4, Step 4                              | Added additional reporting related to two areas (timeliness of reporting and proper funding agency coding).             | January 5, 2011       | Bill Maczees       |
| Section 4, Step 8                              | Updated list of anomaly reports.  | January 5, 2011       | Bill Maczees       |

