

OFFICE OF THE UNDER SECRETARY OF DEFENSE

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OCT 26 2018

MEMORANDUM FOR COMMANDER, UNITED STATES TRANSPORTATION COMMAND (ATTN: ACOUISITION EXECUTIVE) COMMANDER, UNITED STATES SPECIAL OPERATIONS COMMAND (ATTN: ACQUISITION EXECUTIVE) COMMANDER, UNITED STATES CYBER COMMAND (ATTN: ACQUISITION EXECUTIVE) INSPECTOR GENERAL OF THE DEPARTMENT OF **DEFENSE** DEPUTY ASSISTANT SECRETARY OF THE ARMY (PROCUREMENT), ASA (ALT) DEPUTY ASSISTANT SECRETARY OF THE NAVY (ACQUISITION & LOGISTICS MANAGEMENT). ASN (RDA) DEPUTY ASSISTANT SECRETARY OF THE AIR FORCE (CONTRACTING), SAF/AQC DIRECTORS, DEFENSE AGENCIES DIRECTORS, DEFENSE FIELD ACTIVITIES

SUBJECT: Reporting the Description of Requirement in the Federal Procurement Data System

The Description of Requirement data element in Federal Procurement Data System (FPDS) continues to be the one with the least percentage accuracy of the data elements measured in the annual data certifications. Audit reviews in support of the Digital Accountability and Transparency Act (DATA Act) have also identified that this is a data element whose accuracy and clarity could be improved. As such, I ask that you provide a renewed focus on this data element both as your organizations conduct final verification and validation activities for certifying FY18 reported data; but also in ongoing training for FY19 and future reporting.

Specific points to include in your training and outreach to your workforce:

- 1. The data a user enters in FPDS is released to the public. Always consider this when entering data in this free text Description of Requirements field.
- 2. <u>Never</u> enter names of individuals or Personally Identifiable Information (PII) in the field.
- 3. <u>Never</u> reference a classified program or organization. As a reminder, procurement actions that are themselves classified are exempt from FPDS reporting.
- 4. Do not enter XML tags (e.g., IGF::CT::IGF) in the field to identify Inherently Governmental Functions; this is no longer required. This data is now collected in its own specific FPDS field.

- 5. Avoid use of acronyms and military jargon; explain what is being purchased to someone not familiar with the Department of Defense (DoD).
- 6. Use a brief description, do not copy and paste full sections of a performance work statement.
- 7. Do not describe the contract action; describe the products and/or services being procured.
- 8. Because the data is made public, be thoughtful when describing requirements in terms of operational security (OPSEC) and minimizing associated risks. For example, describing furniture being purchased is likely very low risk. However, if the procurement is for services to install security cameras, minimize risks by not identifying the particular building where that is occurring. Services such as construction, facility improvements/repairs, and providing security and/or related training are particularly vulnerable to OPSEC concerns.

Additionally, recommend that contracting offices that routinely procure products and services that are sensitive in nature or may have OPSEC concerns institute a practice with your requirements organizations to review the Description of Requirements data submitted during the 90-days after awards are made so that it can be 'corrected' where appropriate before it is made public. Finally, for Components that have configured their contract writing systems to pre-fill the Description of Requirements data element using data from the contract (e.g., line item description), please review that practice with a focus on minimizing OPSEC concerns.

Thank you for your continued efforts to ensuring data accuracy and appropriate transparency in reporting to FPDS. Further instructions for DoD contracting offices accomplishing FPDS reporting are found in the Defense Federal Acquisition Regulation Supplement's Procedures, Guidance and Information subpart 204.6. My action officer for this effort is Lisa Romney, 703-697-4396 or janice.l.romney.civ@mail.mil.

Shay D. Assad
Director, Defense Pricing and Contracting