



**U.S. DEPARTMENT OF DEFENSE**

**FEDERAL SPENDING DATA QUALITY PLAN**

*May 14, 2010*

[www.defense.gov/open](http://www.defense.gov/open)

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The Department realizes the importance of ensuring the highest data quality on spending information made available to the public. This attribute is an integral part of the overall approach of the Department's Open Government structure. The first step in this process was the appointment of a senior accountable official, who is responsible for quality, objectivity and internal controls over the Federal spending information made available to the public. Our second step is the completion and submission of our current Data Quality Plan. Our plan's focus is on two sets of financial spending data: data related to the American Recovery and Reinvestment Act of 2009 (the Recovery Act) and the data made available on USASpending.gov. This document describes the process used to ensure the quality of that data and will serve as a guide to how we will improve the quality of current data and how data quality will be maintained for future spending information made available to the public while balancing national security and privacy concerns.

Mr. Michael J. McCord  
Principal Deputy Under Secretary of Defense  
(Comptroller)  
Senior Accountable Official

In connection with the plans detailing information disseminated as required by the Open Government Directive, I hereby certify that the information contained in the attached plan materially represents the process of providing governance and assurance of the quality and integrity of federal spending information provided to the public.

Mr. Michael J. McCord  
Principal Deputy Under Secretary of Defense  
(Comptroller)  
Senior Accountable Official

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## **DATA QUALITY PLAN**

### **SECTION 1: IMPLEMENTATION OF THE DATA QUALITY FRAMEWORK**

#### **GOVERNANCE STRUCTURE**

The governance structure related to the data quality of spending information has been incorporated within the Department of Defense's (DoD) "Managers' Internal Control (MIC) Program Procedures," as defined in the DoD Instruction Number 5010.40. As stated in this instruction, it is DoD policy to identify and promptly correct ineffective internal controls relevant to financial reporting processes. Included as a responsibility of the Under Secretary of Defense (Comptroller) (OUSD(C)) is to "designate a DoD Senior Assessment Team (SAT) to provide oversight and accountability regarding the Departments internal controls over financial reporting. The team shall help ensure DoD operations are consistent with the Office of Management and Budget (OMB) Circular A-123 and Standards for Internal Control for the Federal Government." The team provides oversight for:

- Determining the assessment design and methodology.
- Determining the scope of the assessment, i.e., those financial reports covered by the assessment.
- Ensuring that assessment objectives are clearly communicated throughout the organization.
- Ensuring that the assessment is carried out in a thorough, effective and timely manner.

The SAT was established by a charter signed by the Deputy Secretary of Defense. According to the charter its mission and purpose is to meet OMB requirements for an annual report on internal control over financial reporting, and the establishment of a SAT to report on internal control assessment process; and to define the roles and responsibilities of the SAT. With the latest update to the charter, responsibility over data quality of spending information was added.

As defined in the SAT charter the team will be chaired by the Principal Deputy Under Secretary of Defense (Comptroller) and vice-chaired by the Deputy Chief Financial Officer (DCFO). Team membership will be composed of the following:

- Deputy Chief Management Officer
- Principal Deputy Under Secretary of Defense (Acquisition, Technology and Logistics)
- Principal Deputy Under Secretary of Defense (Policy)
- Principal Deputy Under Secretary of Defense (Personnel & Readiness)
- Principal Deputy Under Secretary of Defense (Intelligence)
- Assistant Secretary of the Army (Financial Management and Comptroller)
- Assistant Secretary of the Air Force (Financial Management and Comptroller)
- Assistant Secretary of the Navy (Financial Management and Comptroller)
- Director of Administration and Management, Office of the Secretary of Defense
- Principal Deputy Assistant Secretary of Defense (Networks and Information Integration)
- Deputy Inspector General (for advisory purposes only)

Members shall have sufficient expertise in the functional areas on which the Department is focusing to affect improved internal control in the operational processes and ultimately result in improved accountability and reporting. Members shall determine which identified weaknesses will be reported to OMB in the assurance statement and also monitor the corrective action plans of the entities which identified the weaknesses.

The Chair will:

- Preside at meetings.
- Approve the agenda and minutes for each meeting.
- Periodically report progress to the USD(C).

At a minimum, the SAT will meet twice a year, with a goal of four times a year (quarterly).

One meeting will be held at the beginning of each Internal Controls Over Financial Reporting (ICOFR) year to determine the focus areas for that year. The ICOFR year is from July 1 – June 30<sup>th</sup>. The other required meeting will be held prior to the Statement of Assurance’s due date to determine which internal control weaknesses will be reported as material in the Department’s report on internal controls.

This process will also apply to all spending data made available by The Department under the Open Government Initiative including the Recovery Act funds and all data published on USASpending.gov, as well as future spending designated by DoD leadership.

### **Recovery.gov**

We take the responsibility of allocating Recovery Act funds very seriously. That is why we ensure that our spending reports are prepared and submitted to OMB and Recovery.gov on time. We have developed a set of departmental, agency program, and expenditure plans that detail specific projects and the level of resources that will be funded by Recovery Act dollars. Our recovery plans, status of ongoing efforts and weekly financial and accomplishment reports are published online and available for download at [www.defense.gov/recovery](http://www.defense.gov/recovery).

### **USASpending.gov**

USASpending.gov collects all the financial spending data for an agency. The spending data is in one of several categories: Contracts, Grant and Cooperative Agreements and Loans. To assure quality of the data and to ensure DoD provides data on contracts, grants and cooperative agreements, subcontracts, subgrants and loans, a Data Plan was developed. This plan defines the governance needed as well as the technological changes required to be more transparent with our spending data.

## **RISK ASSESSMENT**

To assist in meeting the President’s high expectations for transparency and accountability, the Department instituted a risk management approach in implementing a reporting process to disseminate department wide spending. The Department issued guidance to identify initial risk levels for each program by each DoD Component directly involved with spending of any funds and the reporting of these expenditures.

Programs receiving funds must establish a risk framework that includes risks associated with the accountability objectives of the law. In addition, the framework should include:

- Identification and assessment/evaluation, and ranking as to impact of risks related to meeting the overall accountability objectives and of Program-specific risks.
- Determination of whether the program has clear measures for outputs and outcomes that tie to the Program’s purpose and has a process/method to accurately obtain and report this information.
- Determination of whether existing internal controls are sufficient to adequately mitigate the risk of waste, fraud and abuse.
- Identification and assessment of the mitigation measures that are currently in place for the identified risks.
- Implementation of additional mitigation activities deemed necessary for any gaps.
- A work plan to track progress.
- Compliance testing of the mitigation activities.
- Provision for periodic reassessment of the risks (because risk profiles of Programs change throughout the funding period through closeout).
- Identification of the data requirements and reporting structure that will be needed for the monitoring and reporting requirements.

The overall assessment includes completion of a risk and gap analysis, risk profile document and risk mitigation strategy for each Treasury Account Fund Symbol which received funds. The analysis provides an overarching assessment of management capabilities in multiple areas. The risk profile provides an assessment of the Program’s business activities and internal controls within five areas: Control Environment, Control Activities, Information and Communications, Monitoring, and Risk Assessment. The risk mitigation strategy will provide an action plan to minimize, monitor, and eliminate risks.

### **GENERAL GOVERNING PRINCIPLES AND CONTROL ACTIVITIES**

The Department has established criteria for review of direction and guidance through the DoD Directives Program, DoD Instruction 5025.01, dated October 28, 2007, which requires review of guidance every five years.

The current framework instills an awareness of the need for internal controls over all financial activities of which making information available to the public is a piece. This framework will not by itself increase data availability. Through coordinated efforts of the Data Quality and Open Government teams, policies will be established requiring that each new data set containing spending information be reviewed by the Data Quality team and the establishment of criteria for continuous review of these data sets.

### **COMMUNICATIONS**

The Department will follow the overall communications strategy as established for our “Open Government Plan” when communicating with the public and soliciting feedback from the public as it relates to Federal spending. The Department launched its Open Government webpage ([www.defense.gov/open](http://www.defense.gov/open)) in early February, including a platform for the public to suggest ideas, comment and vote on each other’s ideas. The Department will closely review ideas posted to the

site, and is committed to carrying out several of the most popular suggestions where feasible. The OUSD(C) has been designated the lead for data validation and oversight of data quality on spending information and in this capacity all requests through the Open Government webpage will be forwarded to the Comptroller's office for appropriate action and response.

The Department is aware of the importance of input from the public and we will continue to solicit and actively consider ideas for improving openness and transparency at [www.defense.gov/open](http://www.defense.gov/open).

## **MONITORING**

Performance metrics for financial information are developed through the OUSD(C)/DCFO Performance Metrics Team (PMT) as well as the Office of the Deputy Chief Management Officer. As the need for metrics are identified, PMT works with representatives of the impacted offices to design metrics that are relevant to the task at hand. The Department has established multiple metrics for all spending to allow for tracking of funds execution in relation to plan. The Metrics process related to federal spending information is further detailed within the Recovery Act & USASpending Sections of this plan.

## **SECTION 2: AMERICAN RECOVERY AND REINVESTMENT ACT**

### **GOVERNING PRINCIPLES AND CONTROL ACTIVITIES**

The Department issued a memorandum to provide guidance for execution and reporting data requirements related to the Recovery Act. The Office of Management and Budget (OMB) M-09-15 (Updated Implementing Guidance for the American Recovery and Reinvestment Act of 2009, dated April 3, 2009) provided specific requirements on execution and reporting on Recovery Act Funds and these requirements have been augmented by Presidential Memoranda and OMB guidance. Based on these sources the memoranda included guidance on several topics including:

- Weekly Financial Activity Reports
- Funding Notification Reports
- Major Communications
- Risk Management
- Registered Lobbyist Communication
- Project Variations During Execution of Recovery Act Funds
- Risk Management
- Spending Plans
- Order of Preference for Funds Execution
- Systems Coding Structures

## **COMPILATION**

To meet the reporting requirements during the short time frames available the Office of the Under Secretary of Defense (Comptroller) decided to use an existing centralized database that collects execution information at project-level as the source of the Recovery funding, to address financial activity reporting requirements of Recovery Act. This database, known as Business Enterprise Integration System (BEIS), has been logically integrated with the DoD contracting system, thus providing the ability for DoD to track Recovery Act project spending by vendor and state level. This ensures compliance with general financial management policies pertaining to the Recovery Act.

The reporting requirements for the monthly report as prescribed in OMB Memorandum M-09-15, provides a set of requirements for information traceability which are expected to be met by the activities receiving the Recovery Act funds. This traceability includes the matching of performing vendor and place of performance at the document level to The Recovery Act Treasury Account Funds Symbols which funded it. This type of reporting is not available from current accounting systems when executing funds through a reimbursable agreement in which a contract is let or other obligation of funds by the performing activity with its own TAFS applied.

In order to collect the greatest amount of execution data, at the proper level, and with the greatest amount of financial information, as well as through the most timely and automated method, controls were established on transaction level data to allow it to be easily reported. These controls included having funds established and reported by a single system where possible and limitations on reimbursable orders to allow direct reporting. A preferred order of execution of funds has been established for Recovery Act funds. Data was established to allow Recovery Act data to be validated against monthly execution data via SF-133 and AR(M)1002. Activities that could not meet these standards were required to report data manually on a weekly basis to be included in all reports.

The need to report data to multiple entities both within and outside of the Department has created the need to be able to define data as it is used in the budget execution process and to be able to extract the data in the formats being defined. Key elements of this process will be the TAFS for the Recovery Act appropriations, project codes assigned to each project and the categories which will be used to group and summarize projects for reporting.

Each identified project is required to have a unique code assigned to it for each appropriation. Therefore code values maybe the same for Air Force and Army but would be differentiated by the appropriation symbol. Because accounting structures are unique in many systems being used and by appropriation type the actual codes which will be associated with each program is to be assigned by the fund holder. In order for this data to be useful information each fund holder is required to notify OUSD(C) Business Integration Office of the accounting system being used, the data element the code will be found in and the code actually associated with each program. The program code maybe entered into the field provided in the spend/phase plan or maybe submitted in a separate document.

Each Program receiving Recovery Act funds must establish a risk framework that includes risks associated with the accountability objectives of the law<sup>1</sup>. In addition, the framework should include:

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<sup>1</sup> Funds are awarded and distributed in a prompt, fair, and reasonable manner; the recipients and uses of all funds are transparent to the public, and the public benefits of these funds are reported clearly, accurately, and in a timely manner; funds are used for authorized purposes and instances of fraud, waste, error, and abuse are mitigated; projects

- Identification and assessment/evaluation, and ranking as to impact of risks related to meeting the overall accountability objectives and of Program-specific risks.
- Determination of whether the program has clear measures for outputs and outcomes that tie to the Program's purpose and has a process/method to accurately obtain and report this information.
- Determination of whether existing internal controls are sufficient to adequately mitigate the risk of waste, fraud and abuse.
- Identification and assessment of the mitigation measures that are currently in place for the identified risks.
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## **MONITORING**

Performance metrics for financial information are developed through the OUSD(C)/DCFO's Performance Metrics Team (PMT) as well as the Office of the Deputy Chief Management Officer. As the need for metrics are identified PMT works with representatives of the impacted offices to design metrics that are relevant to the task at hand. The Department has established multiple metrics for Recovery Act related to obligations and outlays in a timely manner to allow for tracking of funds execution in relation to plan.

A reconciliation process has been developed to identify any variances between the official Recovery Act weekly reports at the end of a month compared to official accounting reports. Each month the obligation and outlay amounts reported on the Financial Activity Report at the appropriation level for all Recovery Act appropriations are validated against the obligations and outlays reported on the Appropriation Status by Fiscal Year Program and Subaccounts AR(M)1002. For any variance between the Recovery Act Performance and Accountability Report (PAR) and the AR(M)1002 report is noted and research is begun to identify the root cause. Manual adjustments are performed within the Recovery Act PAR until corrective action can be made to the reporting system. For

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funded under this Act avoid unnecessary delays and cost overruns; and program goals are achieved, including specific program outcomes and improved results on broader economic indicators.

appropriations which have project counts of under 200, the Recovery Act data verification with the AR(M)1002 report are done at the project level with corrective action initiated for projects not equaling the official accounting report. For other appropriations, Recovery Act data is compared to project level data provided by the fund holder.

### **SECTION 3: USASPENDING**

The Federal Funding Accountability and Transparency Act of 2006 (FFATA) established the requirement for the OMB to establish a single searchable Web site for federal spending data at USASpending.gov. Beginning with data from fiscal year 2007, the site includes certain identification award data for the following types of federal awards: contracts (including purchase orders and task/delivery orders), grants and cooperative agreements (and other forms of financial assistance), subcontracts, subgrants, and loans. The vast majority of DoD data on USASpending.gov is contract data. The Department also makes a significant number of grants, but very few loans.

#### **COMPILATION PROCESS**

*Contracting Data.* To comply with requirements for contract data reporting, the Department joined other Federal Agencies in leveraging an existing government-wide contract reporting system, the Federal Procurement Data System (FPDS), used to accomplish required congressional reporting. Since the Federal Funding Accountability and Transparency Act was enacted, this framework has also been used to provide USASpending.gov the FFATA required data on prime contracts. Using this allowed the contracting community to be able to comply quickly with the timeframes of the Recovery Act.

*Subcontracts:* The subcontracts reporting requirement provides the Department and the rest of the federal government with an additional opportunity to make available information to USASpending.gov. As with the above contracts solutions, we are joining with other Federal Agencies in plans to leverage existing reporting systems to meet the requirements of the USASpending.gov Web site. For subcontracts, a new module (FFATA Subcontract Reporting System (FSRS)) of the Electronic Subcontract Reporting System (ESRS) was developed to allow prime contractors to report the subcontracts they award in accordance with FFATA. This effort also leverages the Central Contractor Registration (CCR) database to collect required top executive compensation data from prime contractors. These efforts require federal regulations and instructions to be updated to require prime contractors and awardees to accomplish required reporting before we can, in turn, submit data to USASpending.gov. These regulation updates are already underway, with the expectation that they will be in place in order to comply with the timeframes indicated in OMB's memo dated April 6, 2010, 'Open Government Directive – Federal Spending Transparency'.

*Grants and Cooperative Agreements:* Department data on USASpending.gov for grants and cooperative agreements is also provided through leveraging an existing system. Funding under DoD grants and agreements is obligated by more than 80 awarding offices in the 50 States, the District of Columbia, and other locations. Each awarding office is required under the DoD Grant and Agreement Regulations to report data about its obligating actions to the Defense Assistance Awards Data System (DAADS), either directly or through its parent Military Department or Defense Agency.

Following enactment of FFATA and OMB specifications for the data to be submitted to USASpending.gov, we added on the additional required data elements and were able to comply quickly with the requirements for the site.

*Loans.* The Department has a relatively small amount of funds awarded through loans. To report this data to USASpending.gov, the Department's Comptroller office provides the required information periodically through a new report.

*The Future.* As additional reporting requirements are identified for USASpending.gov, the Department will work with the OMB to establish the most efficient mechanism to provide the required data.

Awarded contract actions are reported daily to the FPDS and then added to the publicly-available USASpending.gov after a 90-day delay to ensure security of current and imminent military operations. With a single exception, all required USASpending.gov data fields are reported via this mechanism. The 'program source', which the OMB defines as the Treasury Account Symbol, is not reported to FPDS with exception of Recovery Act related actions. In the future, the Department plans to expand the use of that Recovery Act-focused architecture discussed in section 2 above to satisfy the remaining gap in reporting of the "program source" field for all contracts<sup>2</sup>

Under a policy memorandum issued after enactment of the FFATA, each DoD Component awarding office now must submit the data to DAADS twice per month. The Defense Manpower Data Center, which operates DAADS, then compiles and forwards twice per month to USASpending.gov the data about the obligating actions that are required under OMB's Transparency Act guidance. Thus, the process is designed to have each obligating action reported to USASpending.gov sooner than 30 days after the date of obligation, as specified by the Transparency Act.

## **REVIEW PROCESS**

*Contracts.* The Defense Procurement and Acquisition Policy (DPAP) office of the Under Secretary of Defense (Acquisition, Technology and Logistics) established a robust plan for monitoring and improving the data that is provided to FPDS. This Data Quality Plan established the requirement for the Components who have procurement authority to establish their own FPDS Data Quality Plans, conduct quarterly independent verification and validation (IV&V) activities, and provide an annual certification to the Director of DPAP regarding completeness and accuracy.

As a control measure, DPAP produces a number of different anomaly reports that identify current or potential errors in the reporting of Contract Action Reports and distributes these on a rolling 6-8 week schedule to the Components for review and correction, as appropriate.

DPAP has also reviewed on a weekly basis the list of Recovery Act awards posted at the FPDS homepage and taken a proactive approach to addressing any errors found by working individually with the Components for correction.

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<sup>2</sup> Additionally, starting in Q3FY10, the Department will begin to report Other Transactions for Prototypes to the Federal Procurement Data System (FPDS), which will then also be available for USASpending.gov. "Other Transactions for Prototypes" are a different, non-contract form of transactions available specifically for certain research projects.

Components utilize periodic internal and external peer reviews involving Small Business specialists, Competition Advocates, and Contract Policy Groups, in addition to contract review boards or committees to assess overall contracting process compliance with the FAR and Defense Federal Acquisition Regulation Supplement (DFARS), which includes the examination of Contract Action Report (CAR) coding in FPDS. Components are also required to submit quarterly IV&V results to DPAP, as indicated above, to ensure continuous improvement of the reporting process is maintained and data quality is ultimately improved.

Additionally, as a result of data calls and anomalies noticed and provided by GSA on a periodic basis, a significant number of CARs are reviewed throughout the year for specific data elements such as multiple year procurements, incentive/award fees, Recovery Act, undefinitized contract actions, Truth In Negotiations Act (TINA) waivers, commercial item acquisitions, and compliance with various clauses.

*Grants and Cooperative Agreements.* Each person in an awarding office who submits information about an obligating action to DAADS is responsible at the time of submission for the quality of the award data. Upon submission to DAADS, the data is subject to a review process before being accepted into the system. This review process verifies the alignment of the data within the various data fields, compares input values to allowable values, checks for internal consistency, and creates an error report if the submitted data do not pass the edit checks. Awarding offices correct errors as required.

We have an ongoing effort to identify and implement additional measures for improving data quality. A first step that already is under way is to provide greater clarity in the DAADS submission instructions that define and describe the award data elements, to address errors caused by misinterpretation of the current instructions. We also plan to implement additional data system edit checks, coupled with systems-based metrics for assessing timeliness, completeness, and accuracy of awarding offices' data submissions to DAADS. As we continue to identify the most prevalent causes of data errors, we will identify improvements to data systems, policy guidance or regulations, training of personnel responsible for submitting data, metrics, or other measures that can best mitigate those causes. We will seek solutions with good cost-benefit ratios—i.e., that will yield improvements in data quality to justify the burdens and costs associated with their implementation. The future direction of this effort also will be made consistent with the Department's implementation of the pending OMB guidance on data quality under FFATA.

### **MONITOR AND METRICS**

The metrics that monitor completeness and accuracy of the data provided to FPDS, which provides the data to USASpending.gov, are found in the DoD FPDS Data Quality Plan, provided as an attachment herein. These comply with the metrics established by the Office of Federal Procurement Policy (OFPP).

The Treasury Account Symbol (TAS) (a.k.a., program source) is not provided to FPDS for other than Recovery Act actions. The TAS is not procurement data and is not normally captured in contract writing systems in order to provide to FPDS to provide to USASpending.gov. Per the above, the Department intends to expand and utilize the architecture put in place for Recovery Act federal agency reports to address this part of the FFATA requirement in the future. This is the only true outstanding issue in the Department's compliance for with FFATA reporting requirements.

However, there are some issues systematically affect data on contracts at USASpending.gov:

- FFATA requires that the North American Industrial Classification System (NAICS) code be provided with each contract action reported to USASpending.gov. The NAICS were applicable to federal contracts after fiscal year 1998. As such, delivery orders and modifications reported against contracts awarded prior to FY98 will not carry the NAICS code. This is not erroneous reporting because the NAICS is simply not applicable to those actions.
- USASpending.gov changes the data reported to it for contracts from FPDS as indicated on the 'About the Data' section on the website. The Department cannot account for the veracity of the data once it is changed.
- USASpending.gov applies congressional district identification and vendor family hierarchy organization activities based upon when it runs its processes rather than the date of the award action, which is inaccurate. Contract data compilations such as these should be accomplished based on when the contract action is awarded and funds are obligated.
- The conversion from the historic DD350 method of reporting contract award data to the current CAR reporting to FPDS in FY06-07 generated migration issues that perpetuate inaccuracies in FPDS for order and modification CARs against older contracts. This will continue to be an issue for a period of time until most of these contracts are closed. However, the issues should decrease each year, as fewer are still open, and many of those that are still open have been corrected during data validation efforts.

Although these issues are of significant concern, the primary challenge in the Department continues to be user error. Incomplete understanding of the requirements for specific data elements (e.g., program/funding office code, ultimate completion date) is an issue and is being addressed through training conducted within the Components and at the DoD level. Inattention to details in contract reporting, including skipping "optional" data check boxes that were available in prior versions of FPDS is being addressed by communicating to the contracting officer and the contract specialist that they are ultimately responsible for the accuracy of the data. Reliance should not be placed solely on passing the FPDS validations, as passing validations does not guarantee data accuracy.

DoD acknowledges a particular challenge with our units serving in theater overseas. Within the Army specifically, overseas sites continue to experience data quality issues due to a lack of training. At those Commands with a direct relationship with the combatant command, or who are located in the wartime theater of operations, the rotation of the military and civilian contracting workforce is very frequent and short—many rotations last less than 12 months. Many uniformed contingency contracting officers are pulled from the Reserve and National Guard where direct access to system training is severely limited. The Army is working to address these issues and more measures are being put in place within the systems they use to report to FPDS to validate more data before it is sent to FPDS.

Following is a list of other on-going issues (not all inclusive) that the Department has identified over the past few years as affecting data accuracy in FPDS and subsequently in USASpending.gov that are beyond the control of the Department or the FPDS program office to correct:

### **Data Originating Outside DoD's or FPDS Program Office's Control**

- FPDS relies on the base award information for many of the data fields in the Modification and Delivery / Task Order use cases. When DoD is reporting an order against a contract or schedule issued by another federal agency, the DoD user is not allowed to correct erroneous data entered/omitted by the originating agency that then is included in the DoD deliver order contract action report and adversely impacts data accuracy. The issue is greatest in GSA schedules, as they are heavily used by the Department.
- For overseas sites, FPDS occasionally has problems recognizing DUNS of non-CCR registered foreign vendors due to latency of the information. Given the delays between when a DUNS number is issued by Dun & Bradstreet foreign offices, Dun & Bradstreet updating their world data file, and then FPDS being able to validate that DUNS; sometimes the DUNS has to be a minimum of three months old before it can be entered in FPDS.
- FPDS relies on the Central Contractor Registration (CCR) system and Dun & Bradstreet for much of the information related to the vendor. DoD users can not change the information if they know it is incorrect. Although it is entirely appropriate to rely on the vendor for this information and it is the vendor's responsibility to maintain it; this can adversely impact the data accuracy in FPDS.
- Orders placed against another Agency's Indefinite Delivery Vehicle (IDV); awaiting base contract action report with referenced IDV contract number to be finalized in FPDS by other Agency.

*Grants and Cooperative Agreements:* The Department is developing specific metrics to monitor the quality of grants data for completeness, timeliness, and accuracy. We will be developing them based on OMB requirements.

The Department monitors the completeness and to an extent, the accuracy of individual records using internal checks in DAADS. The system will reject a record that is incomplete or internally inconsistent and preclude it from being passed to USASpending.gov until corrections are made. We have initiated a joint effort with DoD components to address data quality more fully and will conform the resulting plan with anticipated OMB guidance.

Because loans are not part of a systemic process, they are added manually as they are required. Monitoring involves verification of each submitted record.

### **SECTION 4: SUMMARY**

The Department of Defense is strongly committed to pursuing the goals of the Open Government Directive and sees this Data Quality Plan along with the Department's overall Open Government Plan as a starting point from which to improve and expand on transparency. This plan currently identifies the processes in place to support the Recovery Act and USASpending.gov databases. As new data sets with spending data become available, we will review the data quality and establish new metrics for this data to ensure that data quality is maintained. We also recognize that as the public feedback expands and the data collection process progresses, our data quality must continue to improve.