

**COMMERCE ACQUISITION MANUAL
1304.6**

DEPARTMENT OF COMMERCE
CONTRACT DATA REPORTING,
VERIFICATION AND VALIDATION

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Table of Contents

SECTION 1 – OVERVIEW	2
1.1 BACKGROUND	2
1.2 PURPOSE.....	2
1.3 APPLICABILITY	2
1.4 ROLES AND RESPONSIBILITIES.....	2
SECTION 2 – CONTRACT DATA REPORTING.....	4
2.1 BACKGROUND.....	4
2.2 REPORTING IN FPDS.....	4
2.3 SPECIAL REPORTING REQUIREMENTS.....	5
SECTION 3 –VERIFICATION AND VALIDATION	8
3.1 BACKGROUND.....	8
3.2 VERIFICATION AND VALIDATION OF FPDS DATA	8
3.3 SPECIAL CONTRACT DATA REPORTING.....	9
APPENDIX A – DOD ORGANIZATION CODES.....	10
APPENDIX B – BUREAU FPDS DATA QUALITY REPORT	11
APPENDIX C - SUMMARY OF KEY DATA ELEMENTS.....	16

CONTRACT DATA REPORTING, VERIFICATION AND VALIDATION

SECTION 1 – Overview

1.1 Background

Federal Procurement Data System (FPDS) is the central repository for a wide variety of contract data; is used to create recurring and special reports for the President, Congress, the Government Accountability Office, Federal executive agencies and the general public; and is the basis for pivotal decisions by all constituents. In addition, FPDS data is used to populate the USAspending.gov website in accordance with the Federal Funding Accountability and Transparency Act. Therefore, the accuracy, integrity and timeliness of FPDS data are essential.

The Department of Commerce (DOC) Senior Procurement Executive is required to report and certify contract actions in the FPDS annually. Reporting, verification and validation requirements are standardized herein in accordance with Office of Management and Budget (OMB) guidelines.

1.2 Purpose

The purpose of this policy is to set forth DOC requirements for contract data reporting in FPDS; establish a department-wide requirement for routine, independent, statistically valid data verification and validation; and assign clear data verification and validation responsibilities.

1.3 Applicability

This policy is applicable to all acquisitions within the DOC and its operating units that are subject to FPDS reporting, verification and validation.

1.4 Roles and Responsibilities

1.4.1 Senior Procurement Executive (SPE)

The Senior Procurement Executive is responsible for developing and monitoring a process to ensure timely and accurate reporting of contractual actions to FPDS. The SPE is also responsible for annual certification of DOC FPDS data.

1.4.2 Senior Bureau Procurement Official (BPO)

The Bureau Procurement Official is responsible for implementation of processes and reviews that ensure compliance with data reporting, verification and validation requirements in FPDS including quarterly and annual reporting. Further, the BPO is responsible for ensuring that all individuals within their operating unit with contracting authority (warrant) have within their performance plans, as either a critical element or included within a critical element, the requirement that contract data be entered completely, timely and accurately.

1.4.3 Head of Contracting Office (HCO)

The Head of Contracting Office is responsible for supporting the implementation of processes and reviews that ensure compliance with data reporting, verification and validation requirements in FPDS.

1.4.4 Contracting Officer (CO)

The contracting officer is responsible for submission and accuracy of all contract action reports (CAR) in FPDS in accordance with the requirements of this policy. Contracting officers are responsible for the complete, timely and accurate submission of data regardless of who enters the data.

1.4.5 Risk Management Division (RMD)

The Risk Management Division, Office of Acquisition Management, is responsible for oversight of data reporting, verification and validation processes; and preparation of the Annual Data Quality Report.

1.4.6 Commerce Acquisition Systems Division (CASD)

The Commerce Acquisition Systems Division supports the reporting, verification and validation processes through development of data samples and data collection and analysis.

1.4.7 Independent Verifier and Validator

The independent verifier and validator is responsible for review, verification and validation of all contract data entered into FPDS and other required data points of entry. This function may be filled by more than one individual but verification and validation activities cannot be met by the immediate contracting office responsible for the CAR in FPDS.

1.4.8 FPDS Agency Point of Contact

The Department of Commerce FPDS agency point of contact within DOC/CASD is responsible for the management of agency specific FPDS issues and represents the agency on the FPDS Change Control Board.

1.4.9 Contract Writing System Administrator

The contract writing system administrator at the Department of Commerce is responsible for providing appropriate access levels to FPDS users such as establishment of initial access and re-activation of access, as necessary.

END OF SECTION 1

SECTION 2 – Contract Data Reporting

2.1 Background

This Section of the Chapter defines the basic reporting requirements for FPDS as well as special reporting considerations for specific sub-categories of contract awards.

Supplementary information on all data categories in FPDS can be found in the *FPDS-NG Government User's Manual*, which is located at www.fpds.gov under the "Training" tab.

2.2 Reporting in FPDS

2.2.1 Timeliness of FPDS Data Reporting

In accordance with FAR Subpart 4.604(a)(2), contracting officers must submit complete and accurate contract action reports and confirm the contract action report is accurate prior to release of the contract award. The cognizant contracting officer shall include documentation of the pre-award review in the official contract file. Contracting officers must refer to the *FPDS-NG Government User's Manual* to ensure compliance with all applicable fields required for complete and accurate reporting. Contracting officers must comply with the numbering conventions established for operating units and procurement offices within the DOC.

2.2.2 Reportable Actions

Contracting officers are responsible for reporting all non-classified information for contract actions using appropriated funds as specified in FAR 4.606 including, but not limited to:

- (a) Definitive contracts, including purchase orders over the micro-purchase threshold awarded by a contracting officer.
- (b) Indefinite delivery vehicle (identified as an "IDV" in FPDS) and all calls and orders awarded under the IDV. Examples of IDVs include the following:
 - (i) Task and Delivery Order Contracts including—
 - (I) Government-wide acquisition contracts.
 - (II) Multi-agency contracts.
 - (ii) GSA Federal supply schedules.
 - (iii) Blanket Purchase Agreements.
 - (iv) Basic Ordering Agreements.
 - (v) Any other agreement or contract against which individual orders or purchases may be placed.

Contracting officers shall review FAR Subpart 4.606 for a complete and current listing of all reportable actions.

2.2.3 Non-Reportable Actions

The following actions are not reportable in FPDS:

- (a) Imprest fund transactions below the micro-purchase threshold, including those made via the Government purchase card.
- (b) Orders from GSA stock and the GSA Global Supply Program.
- (c) Purchases made at GSA or AbilityOne service stores as these items are stocked for resale and have already been reported by GSA.
- (d) Purchases made using non-appropriated fund activity cards and individual Government personnel training orders.

2.3 Special Reporting Requirements

Several categories of contracts or contract funding are of particular interest to the various constituents of Federal contract information or are used to support significant sub-reporting requirements. These categories are itemized below with related data fields within FPDS.

2.3.1 Interagency Acquisitions

Interagency acquisition is the term used to describe the process by which one agency (requesting agency), uses the contracts and/or contracting services of another agency (servicing agency) to obtain supplies and services. Through use of an interagency acquisition, an agency needing supplies or services can obtain them using another agency's contract, the acquisition assistance of another agency, or both. The use of interagency acquisitions, either through direct access to another agency's delivery vehicle (direct acquisition) or in order for a servicing agency to award a contract on behalf of a requesting agency (assisted acquisition) can be an effective means of acquiring needed goods and services. DOC operating units and the Office of the Secretary may function in the interagency acquisition process as either the requesting agency or the servicing agency. Regardless of the role, compliance with reporting requirements is essential.

2.3.1.1 Assisted Acquisitions

For assisted acquisitions, the contracting office is responsible for ensuring that correct funding information is provided to the servicing agency (when DOC is the requesting agency) or ensuring that the correct funding information is accurately reported at the time of award (when DOC is the servicing agency). Key FPDS fields for this requirement are: Interagency Contract Authority; Other Interagency Contracting Statutory Authority; Funding Agency ID; and Funding Office ID (if applicable).

2.3.1.2 Direct Acquisitions

A direct acquisition is a type of interagency acquisition where the requesting agency acquires goods or services through another agency's indefinite delivery vehicle by placing an order directly against the indefinite delivery vehicle. Key FPDS fields for this requirement are: Referenced IDV ID; and IDV Type.

2.3.1.3 Contracts Awarded on Behalf of the Department of Defense

When DOC is functioning as the servicing agency and Department of Defense funding is included in the award, either in part or in full, the contracting officer is required to complete the FPDS data field entitled "Funding Office ID" (4C and 4D) with the Department of Defense Automatic Addressing Code (DoDAAC) identified on the requisition (most often on a Military Interdepartmental Purchase Request (MIPR), Department of Defense Form 448) representing the requisitioner for the transaction. On a MIPR, this is NOT the Pay Office DoDAAC nor the Accounting Station DoDAAC identified in blocks 13 and 14 respectively. The requisitioner's DoDAAC should be identified in block 8 with the identity of the organization providing the MIPR (note that it is often depicted as the first six characters of the MIPR number in block 5). *Contracting officers shall not accept requisitions/MIPRs if the requisitioner's DoDAAC is not provided.*

The contracting officer shall complete the FPDS data field entitled "Funding Agency ID" with the code shown in Appendix A that correctly corresponds to the DoDAAC being reported in the "Funding Office ID" data field. This code should not be confused with similar codes that are often seen in block 14 of the MIPR.

Key FPDS fields for this requirement are: Funding Agency ID; Funding Office ID; and Consolidated Contract.

2.3.2 Time and Material and Labor Hour Contracts – Commercial Items

The contracting officer shall ensure that all required reporting including the FPDS accurately reflects the nature of the award as having used commercial item procedures and as time and material or labor hour contract or task order, *not* fixed price. The fixed hourly rates contained in time and material or labor hour contracts do not provide the basis for a fixed price contract. Key FPDS fields for this requirement are: Type of Contract; Information Technology Commercial Item Category; Commercial Item Acquisition Procedures; and Commercial Item Test Program.

2.3.3 Small Business Classifications

The Small Business Achievements by Awarding Organization report based on contracting data entered into FPDS is used for various assessments. Key FPDS fields for this requirement are: Bundled Contract; Type Set Aside; and Small Business Size Selection. [Exception: the small business data for awards placed against GSA schedules are entered by GSA.]

2.3.4 Performance-Based Services Contracts

Performance-based services contracts are reported through FPDS and the associated report entitled Performance Based Acquisition Report provides the basis for various assessments. Performance-based services contracts describe the requirements in terms of results required rather than the methods of performance of the work; use measurable performance standards (i.e., terms of quality, timeliness, quantity, etc.) contained in quality assurance surveillance plans; specify procedures for reductions of fee or for reductions to the price of a fixed-price contract when services are not performed or do not meet contract requirements (see 46.407); and include performance incentives where appropriate. The key field in FPDS is Performance Based Service Acquisition.

2.3.5 Electronic Subcontract Reporting System (eSRS) Interface

The Electronic Subcontract Reporting System (eSRS) is used to track subcontracting plan details for all applicable contracts involving subcontract planning. FPDS serves as the interface with eSRS for the initial information regarding whether a subcontracting plan is included or required for a specific contract. The key FPDS field for this requirement is Subcontract Plan.

2.3.6 American Reinvestment and Recovery Act Contract Actions

The following guidance applies to FPDS reporting for American Reinvestment and Recovery Act (Recovery Act) contract actions only.

When entering data in FPDS on any action (including modifications) funded by the Recovery Act, contracting officers must enter the funding agency's Treasury Account Symbol (TAS) in the Description of Requirement field. The TAS code should be entered with TAS:: preceding the code and ::TAS following the code. The code itself should have spaces between the segments, i.e., Agency code (2 characters) would be entered followed by a space then the Account code (4 characters) followed by a space and then the Subaccount code (3 characters) which is optional and would only be included by those agencies utilizing this segment of the code. The entry would appear as follows:

- TAS::XX XXXX XXX::TAS (if you are using a sub-account code) or
- TAS::XX XXXX::TAS (if you are not using a sub-account code)

The field shall also include a description of the goods/services that were procured that is clear and can be understood by the general public. The key FPDS field for this requirement is Description of Contract Requirement.

END OF SECTION 2

SECTION 3 – Verification and Validation

3.1 Background

Verification and validation of FPDS data is an ongoing process within DOC. The approach defined in this policy reinforces the need for accurate contract data through independent verification and validation of contract data as the complexities of contract award and management increase and transparent conduct of these activities is emphasized.

The Office of Federal Procurement Policy (OFPP) now requires that agencies submit a single Agency FPDS Data Quality Report annually that includes the agency's certification of the completeness and accuracy of its FPDS data for the previous fiscal year, a description of activities to assure data input accuracy, and a summary of its policies and procedures for measuring and reporting data accuracy.

This policy provides general guidance for the verification and validation processes to be conducted at the operating unit level in support of the DOC-wide management of data accuracy and external reporting requirements.

3.2 Verification and Validation of FPDS Data

3.2.1 Overview

In order to ensure compliance with verification and validation requirements, BPOs will be responsible for conducting verification and validation of the sampled contract data provided by RMD/OAM on a quarterly basis for the first three quarters of the fiscal year and on an annual basis following the fourth quarter of the fiscal year. The samples will be designed such that:

- (a) The data elements identified in Appendix C, Summary of Key Data Elements, are verified and validated in accordance with OFPP requirements;
- (b) The sample size will be sufficient to support a minimum confidence level of 95% with an error rate of $\pm 5\%$;
- (c) All types of transactions are included in the independent verification and validation process.

3.2.2 Operating Unit Actions

- (a) Contracting officers shall review all FPDS and other required data entry prior to executing the award and officially document the review by signing the FPDS data sheet and including the data sheet in the contract file;
- (b) Independent verification and validation of FPDS data shall be conducted by the independent verifier and validator for the sampled contract data described above. This function may be filled by more than one individual but verification and validation activities cannot be met by the immediate contracting office responsible for the CAR in FPDS. The scope and content of independent verification and validation may be expanded by the BPO;
- (c) BPOs shall correct all errors identified in the verification and validation process in an individual or systemic fashion, depending on the nature of the error;

- (d) Quarterly/Annual Reporting – BPOs shall provide the results of the quarterly data quality verification and validation for the sampled contract data provided by RMD/OAM using the format found in Appendix C as follows:

Reporting Periods

First Quarter (FY)
Second Quarter (FY) (Not cumulative)
Third Quarter (FY) (Not cumulative)
Annual (Cumulative for FY)

In addition, the resolution of all draft and error entries in FPDS for the reporting period shall be addressed in each quarterly report.

- (e) Annual Reporting - BPOs shall complete the Operating Unit FPDS Data Quality Report (Appendix B), at their operating unit level annually in order to document the processes, remedies and internal controls utilized within their operating units. This annual report is due on November 15 of the subsequent fiscal year.

3.3 Special Contract Data Reporting

Additional verification and validation requirements based on specific types, method or funding of contract awards may be required. The quarterly samples provided to the operating units by RMD will reflect these requirements.

3.3.1 American Reinvestment and Recovery Act Contracts

For all contract actions containing funding through the American Reinvestment and Recovery Act, special focus shall be placed on the “Description of Requirement” data element, as it is the only data element that specifically identifies contract actions that were funded in whole or in part by the Recovery Act. When this field includes a TAS displayed in one of the two allowed formats (*TAS::XX XXXX::TAS* or *TAS::XX XXXX XXX::TAS*), the field shall also include a description of the goods/services that were procured that is clear and can be understood by the general public. If it does not, the field shall be considered inaccurate. Additionally, the TAS identified in the field shall be the predominant Recovery Act TAS used to fund the contract action if more than one Recovery TAS was used. If it is not, the field shall be considered inaccurate. Finally, if an award notice indicating a Recovery Act award has been posted to FedBizOpps for the contract action that is being reviewed and the CAR does not indicate a Recovery Act TAS in the “Description of Requirement” field, the field shall be considered inaccurate.

END OF SECTION 3

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APPENDIX A – DoD Organization Codes

APPENDIX B – OPERATING UNIT FPDS DATA QUALITY REPORT

Operating Unit Name: _____

Fiscal Year of FPDS Data: _____

Operating Unit Data

Number of Contracting Offices Providing Data to FPDS: _____

Total Procurement Obligations for this fiscal year: _____(\$ in millions)

Part I - Data Quality Certification

Certification Statement

I certify that ____% of all reportable contract actions awarded during FY _____ 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

[Use additional pages as necessary to discuss any procurement data that are not included in this certification. Identify data belonging to organizations that have been unable to enter their data into FPDS as well as contract writing system (CWS) data and “draft” FPDS records that have not passed the FPDS data validation routines. For each category of missing FPDS records, indicate the number, dollar value, and age of the missing records and your milestone plans for bringing these records into FPDS.]

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

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.

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

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.

Controls over Data Input

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)

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

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

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.

- Federal employee - contracting officer _____
- Federal employee - contracting specialist _____
- Federal employee - data entry clerk _____
- Federal employee – other. Please specify _____
- Contractor – program manager/key personnel _____
- Contractor - data entry clerk _____
- Contractor – other. Please specify _____
-

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.

- Federal employee - contracting officer _____
- Federal employee - contracting specialist _____
- Federal employee - data entry clerk _____
- Federal employee – other. Please specify _____

- _____
Contractor – program manager/key personnel _____
- Contractor - data entry clerk _____
- Contractor – other. Please specify _____
- _____

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

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.

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.

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.

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:

The use of anomaly reports that flag questionable data element values based on their relationship to other data elements. [NOTE: A list of anomaly reports suggested by GSA is posted in the “Data Quality Guidance” section of the MAX Collaboration Tool pages on FPDS Data Quality.]

Periodic Contract Review Boards.

Outside peer reviews.

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

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

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.

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

Qualifications of Reviewers

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

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

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

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

Scope of Review

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

All transaction types (e.g., modifications, delivery orders, etc.);

All components of the agency that submit contract action reports to FPDS;

Data from all four quarters of the fiscal year; and

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.]

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

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

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

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

Adequacy of Review

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.

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.

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.

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.

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.

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

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

BUREAU PROCUREMENT OFFICIAL NAME (Printed)

BUREAU PROCUREMENT OFFICIAL SIGNATURE

DATE

APPENDIX C - Summary of Key Data Elements

<u>Data Element Name</u>	<u>No. of Records Reviewed</u>	<u>No. of Correct Records</u>	<u>% of Correct Records</u>	<u>Causes of Invalid Data - User</u>	<u>Causes of Invalid Data - FPDS</u>	<u>Causes of Invalid Data - Other</u>
02A Date Signed						
02C Completion Date						
02D Est. Ultimate Completion Date						
02E Last Date to Order						
03A Base and All Options Value						
03B Base and Exercised Options Value						
03C Action Obligation						
04C Funding Agency Value ID						
06A Type of Contract						
06F Performance Based Service Acquisition						
06M Description of Requirement						
08A Product/Service Code						
08G Principal NAICS Code						
8K EPA-Designated Product(s)						
8L Recovered Materials/Sustainability						
09A DUNS No						
09H Place of Manufacture						
09K Place of Performance ZIP Code						
10A Extent Competed						
10C Other Than Full and Open Competition						
10D Number of Offers Received						
10N Type of Set Aside						
10R Fair Opportunity/Limited Resources						
11A CO's Determination of Business Size Selection						
11B Subcontract Plan						
12A IDV Type						
12B Award Type						
Total Records Sampled						