

COVID-19 reporting highlights the need for succinct and clear award descriptions at both the prime contract and subcontract levels.

- The FAR (4.604) outlines responsibilities for CAOs, SPEs, and contracting officials with respect to procurement data quality and descriptions for contracts (FAR 5.207 & 5.302) and for prime contractors with respect to subcontracts (FAR 4.14).
- The FPDS Data Dictionary (element 6M) provides information for describing the requirements for contracts and modifications.
- OMB guidance requires agencies to leverage the FAR-based data quality requirements in support of ongoing internal controls activities (OMB Circular A-123²).
- OMB supplemented the requirements of the annual procurement verification and validation through memoranda³ and additional communications to the CAO regarding small business data quality.

For contract awards with the COVID-10 NIA (P20C) – Procurement Verification and Validation Addition for the annual procurement verification and validation in FY2021 through FY2025 - in addition to the existing quality control checks for the description of requirements field, OMB is asking agencies to include in their review an assessment of the clarity of the description beginning in FY2021. Agencies should provide these results in a narrative format in the annual submission. As a reminder, OMB Circular A-123 clarifies that existing Federal Acquisition Regulation requirements for procurement data validation are sufficient to meet requirements of OMB M-18-16 for DATA Act data quality plans.

A snapshot of the information contained in this attachment is contained in Table 1 to serve as a quick checklist for the workforce.

² OMB Memo M-18-16 – *Appendix A to OMB Circular No. A-123, Management of Reporting and Data Integrity Risk* of June 6, 2018.

³ OMB memoranda on procurement data quality beginning in 2008 are available at https://www.whitehouse.gov/omb/management/office-federal-procurement-policy/#_Office_of_Federal_1 or <https://community.max.gov/x/j460IQ>

Table 1

Quick Reference for Prime and Sub-contract Descriptions for Contracts in Response to COVID-19

New Contracts Awarded in Support of COVID-19 Response

- ✓ The description allows any reader to identify what is being purchased, purpose related to agency mission if known to the contracting office, and location (if applicable and if such information can be provided without introducing security concerns)
- ✓ The description field is not limited to what is being purchased, it may contain additional information, including abbreviations and acronyms necessary for agency business purposes, inventory controls, or automation.

COVID Modifications to Existing Contracts

- ✓ The description allows any reader to identify what the modification is doing, what is being bought, etc, not the reason for the modification (that is a separate field in FPDS).
- ✓ The description field is not limited to the purpose of the modification, it may contain additional information including abbreviations and acronyms necessary for agency business purposes.
- ✓ If the modification is in support of 3610, the description field begins with COVID-19 (OMB memo M-20-22)

Subcontracts Issued by Prime Contractors – agencies are encouraged to reiterate the requirements of FAR 4.14. If at all possible, prime awardees for COVID-19 awards should be encouraged to include “COVID” in the description field for subcontracts reported in accordance with FAR 4.14.

Examples

Clear descriptions of awards:

- Seward ranger district outhouse cleaning services
- Medical supplies (hand sanitizer, clean wipes, spray bottles, thermometer’s, etc.) to combat covid-19 and prevent any spread
- Alternate care facility (ACF): Jacob Javits Convention Center – New York, NY

Award descriptions that need work:

- IGF:CL:IGF
- IDC
- CNH-GEC