



General Services Administration Public Buildings Service

Contracting Officer Guidance Federal Agency Review

Version 1.0
September 30 2009

Document Change History

Version	Date	Descriptions
1.0	September 30, 2009	October 2009 review cycle



This guidance is directed to Recovery Act Contracting Officers who will perform both the data and official federal agency review of their respective Recovery Act funded actions.

Registration

All Recovery Act Contracting Officers need to be registered at the reporting website in order to perform the federal agency review function. If you have not already registered you must go to www.FederalReporting.Gov and register. In order to successfully register, you will need your name, your phone number, your government email address (e.g., jane.doe@gsa.gov) and Agency Name (e.g., 47-General Services Administration). A drop down list of agency names will be available on the registration form. There is not a specific drop down selection for the Public Buildings Service.

Agency Review

The Contracting Officer will be responsible for reviewing their contractor's reports for the life of the contract. Report review is done on a quarterly basis, with the initial report cycle beginning 10/1/2009.

OMB requires each submitted report to be reviewed for:

- 1) Consistency with the actual award information;
- 2) Significant errors; and
- 3) Material omission

OMB has defined a **significant error** as data that is not reported accurately and where such erroneous reporting results in significant risk that the public will be misled or confused by the contractors' report. **Examples of significant errors include, but are not limited to:**

- The contractor reported an invoice amount that is in excess of the award obligation;
- The contractor incorrectly states the award is fully completed when it is 50% complete.

Additionally, a **material omission** is data that is not responsive to a specific data element. During review of the report, the Contracting Officer should remember the intent of the report is that of transparency. For example, where the contractor is required to provide a narrative description, the Contracting Officer shall ensure it is sufficiently clear to be understood by the general public.



Specific Review Process

As indicated in the PBS guidance to award recipients (e.g., contractors), there are specific dates in the reporting process that you should be aware to ensure the PBS Recovery reports are fully reviewed before the data is posted to Recovery.gov

Listed below are the key dates for the initial report cycle.

<p>10/01/09 - 10/10/09</p>	<p>The contractor enters their contract report data into FederalReporting.gov.</p>
<p>10/11/09 - 10/21/09</p>	<p>During this timeframe, the contractor can still enter their contract report data into FederalReporting.gov; however, it will be considered LATE. The contractor will be required to enter a “justification” for all late submissions.</p> <p>On 10/11/2009, the submitted data will be available for extract. Using this extract, the PMO will perform an automated review of the data submitted with the contract data loaded in FPDS. Any obvious errors (e.g., contractor submitted a higher award amount than in FPDS; or the contractor listed 5,000 jobs created) will be communicated back to the contractor by the PMO Outreach Call Center for correction. The PMO will provide each CO with an exception report of any unresolved data element findings identified during their cursory review.</p> <p>NOTE: OMB has indicated that the submitted report data will be published on Recovery.gov beginning 10/15/2009. You are reminded that this data is still in “draft” stage.</p>
<p>10/22/09 - 10/29/09</p>	<p>On 10/22/2009, the report is now locked. The award recipient can no longer access the report unless the CO unlocks it.</p> <p>It is during this date range where the CO must review their respective award recipient’s reports.</p> <p>If the CO discovers any significant errors or material omissions in any report the CO shall immediately add a comment on the report. The act of “commenting” will unlock the report; and generate an automated email to the contractor for action.</p> <p>Currently, the FederalReporting.gov system does not notify the CO when the contractor has responded to their comments unless the contractor inputs a responding comment. That said, the CO is asked to be cognizant of any reports they have unlocked to ensure the report is finalized by 10/29/2009.</p>

10/30/2009

At the end of the 29th day of the reporting cycle, at midnight Pacific Time, all reports are automatically transitioned to a “published” status and sent to Recovery.gov. No further action is allowed by either the contractor or the CO.

PMO Role

- The PMO will perform an automated review of the data against the ARRA award data loaded in FPDS.
- The PMO will perform a cursory review for any significant error or omission (i.e., the contractor submitted a higher award amount than in FPDS; or the contractor listed 5,000 jobs created) as reports are submitted. All findings will be communicated back to the contractor by the PMO Outreach Call Center for correction.
- Lastly, the PMO will provide each Contracting Officer with an exception report of any unresolved data element findings for reference during the federal agency review period.

Contracting Officer Role

- The Contracting Officer will review the various data elements on the submitted report (please see list of data elements on page 9). There are many data elements on the report the contractor must complete. The Contracting Officer is asked to review the entire report; however, data substantiation is not expected of all elements as the Contracting Officer will simply not be able to do so in the case of each data element.
- No later than 10/29/2009, the Contracting Officer performs the final review of the report. Currently, there are four statuses that a Contracting Officer can apply to a recipient report:
 1. **Not Reviewed** — The report has not been reviewed by the Contracting Officer.
 2. **Reviewed with No Comments** — The Contracting Officer has reviewed the report and all data is fine. No comments need to be made.
 3. **Reviewed with Comments** — The Contracting Officer has reviewed the report and has made comments on the report. The act of “commenting” unlocks the report, which is now available for reply commenting or editing by the contractor.
 4. **Reviewed and Resubmitted** — The contractor has responded to the previously reviewed report (which was “unlocked” in #3 above) and has submitted an updated report back to the Contracting Officer for review.

How to view the submitted reports online

1. The Contracting Officer logs on using their user ID and password obtained in the registration.
2. Click on the Prime Recipient link under the “Quick Links” menu on the left side of the home page.



Quick Links

My Reports

- [Prime Recipient](#)

Administration

- [My Account](#)

3. In the My Reports, Prime Recipient View page you will see this “Search Filters” area.

FederalReporting.gov

Home | About | Downloads | FAQ | Help

Hello, Agency Reviewer (Agency Reviewer)
[You have 1 unread messages.](#)
 Logoff

Current Reporting Cycle
Recipient Review - Prime Recipients review reports. Prime and Sub Recipients make necessary corrections.

Quick Links
My Reports

- [Prime Recipient](#)

Administration

- [My Account](#)
- [List of Registered DUNS](#)

Download Templates

My Reports - Prime Recipient View

Search Filters

Award Type: [All] Award Number: [] DUNS Number: []

Calendar Year: [2009] Quarter: [4] Report Status: [All] Review Status: [All]

Awarding Agency Code: [] CFDA Number: [] Govt Contracting Office Code: []

Search

Search Results

6 reports found, displaying all reports. [Search Results Tips](#), [Search Results Legend](#)

Award Type	Prime Award # / Order #	Prime DUNS #	Status	Award Amount	Sub Count
C	789-SJ-238	002512481	S	\$515400.00	0
G	PR-27837-X	002512481	S	\$80400.00	0
G	02483-x	002512481	S	\$510200.00	2

Important to note: All agency reports will be accessible to all government registrants. That is, all GSA submitted reports – this includes PBS contract reports, PBS lease reports, and FAS reports – will be accessible to every government personnel who have registered. Contracting Officer’s must be cognizant to perform the official “review” function only on their respective reports. You must use the “search filter” to drill down to your respective report. The % may be used as a wildcard in your search.

You may search via the Contracting Office Code (e.g. CD000, EW000) to have only your office reports display. Alternatively, you may search via your specific contract number.

4. Your “search results” will be displayed on the screen.

Search Results

[Search Results Tips](#), [Search Results Legend](#)

5 reports found, displaying all reports.

Award Type	Prime Award # / Order #	Prime DUNS #	Status	Award Amount	Sub Count
G	789-2R-873-HF	786808758	S	\$250839.27	0
G	BG-27544-KRY	786808758	S	\$247082.28	0
G	HF-267392	002512481	S	\$2756829.00	0
G	VA-7892-KJR	786808758	S	\$1250000.00	1
G	YF-28793-X	002512481	S	\$7500250.00	2



5. Once you've located the award you want to review click on the blue hyperlink to open to the specific report.
6. The report view screen is made up of multiple tabs:
 - Prime Recipient
 - Sub Recipients
 - Vendors (Not Applicable Contracts)

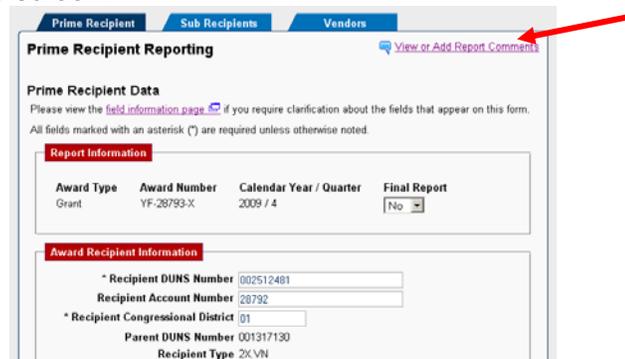
Scroll down through the report in order to view all of the report data. Click on the Sub Recipients tab to view any subcontractor data.

7. If all of the report data is acceptable the Contracting Officer can click on the “Mark as Reviewed” button.



The report will be published on Recovery.gov with the review status of “Reviewed with No Comment.”

8. If the Contracting Officer discovers a mistake on the report he/she needs to comment on the report. This will “unlock” the report and allow the contractor to make any corrections. To do this, at the report main page click the “View or Add Report Comments” link in the top right corner of the screen.



9. The View or Add Report Comments box will display. The Contracting Officer types in their specific verbiage in the Comment box. Note that comments are made at the report level; therefore, your comments should be as specific as necessary for the contractor to understand what you want them to correct. Once done, click on the submit button.



View or Add Report Comments

Close Comments Window

Report Information

Award Type	Award Number	Prime DUNS
Grant	VA0004-K	021839618

Report Comments

- Please check the subaward date on your award. your report stated 07/08/2009 as the award date. Our records show 06/08/2009 as award date.
Regis Jennings - Sep 25, 2009 9:20:45 PM
- Reply: Yes, that is in error. I will change award date to June 8th and update the report.
Marcia Wallace - Sep 25, 2009 9:34:26 PM

Add New Comment

Comment

Submit

Close Comments Window

The act of commenting will trigger an email notification to the contractor. Once the contractor replies the Contracting Officer will also receive an email notification. NOTE: The email that is generated will be sent from the following email address: DoNotReply@FederalReporting.gov

It is important for all Contracting Officer's to understand that each time a contractor uploads an updated report, the previous version of that report is replaced.

Contractor responds to CO comments and submits the report: Once the contractor makes any corrections to a Contracting Officer's comment they will resubmit the report. At this point the status of the report is changed to **Reviewed and Resubmitted**. Again, this status means that the contractor has responded to a previously reviewed report (which was "unlocked" by the Contracting Officer via the commenting process) and has submitted an updated report back to the Contracting Officer for review.

The Contracting Officer must again review the report to ensure the contractor has made the necessary corrections.

10. If all of the resubmitted report data is acceptable the Contracting Officer can now complete their review of the resubmitted report by performing the "Mark as Reviewed" function described above.

Prime Recipient Sub Recipients

Prime Recipient Reporting

Mark As Reviewed

Prime Recipient Data

Please view the [field information page](#) if you requi



Contractor takes no action to CO comments: If the contractor does *not* respond to the CO comments and never resubmits the report by the end of the report cycle, the report will be published to Recovery.gov with the status “**Reviewed with Comments.**”

11. If all of the resubmitted report data is acceptable the Contracting Officer can click on the “Mark as Reviewed” button.

Contracting Officer does not perform required review: If the Contracting Office does not access FederalReporting.gov to take any review action the report by the quarter end date, the report will be published to Recovery.gov with the status “**Not Reviewed.**” It is anticipated the initial cursory review performed by the PMO will highlight any possible errors or omissions. However, it is incumbent on the Contracting Officer to physically perform the final review for each of their Recovery Act contractors.

Note of caution to Reviewers: There is a mass “marking as reviewed with no comments” capability in FederalReporting.gov. Contracting Officers should not click on this mass review button as in doing so will cause all reports on their screen to be sent to Recovery.gov with this status. It is the Contracting Officer responsibility to review their individual contract reports and mark each individually as reviewed.

Review Audit Trail

The Office of Acquisition Management and PMO will be able to retrieve a report review audit trail once reports have been submitted to FederalReporting.gov. The information captured in the audit trail will provide the agency with the following information:

- Created By—The name of the contractor who submitted the Initial Submission Report for this award
- Date Created—The date and time at which the Initial Submission Report was entered into FederalReporting.gov
- Last Updated By—The name of the contractor who submitted the most recent report submission (updated report)
- Last Updated On—The date and time at which the most recent report was submitted

Additionally, the agency extract data available to the PMO and the Office of Acquisition Management will provide a listing of all reports that were reviewed by the CO and those that were not reviewed.



Report Data Elements

The following table shows the various data elements and the corresponding action required by the Contracting Officer as part of their data review.

Data Element	Contracting Officer (CO) Review Expectation
Recipient DUNS	Cursory review by PMO: data matched against FPDS data
Award Type	Entry should be "Federally Awarded Contract"
Award Number	Cursory review by PMO: data matched against FPDS data
Order Number	Cursory review by PMO: data matched against FPDS data
Recipient Congressional District	Cursory review by PMO: data matched against FPDS data
Funding Agency Code	Cursory review by PMO: data matched against FPDS data
Awarding Agency Code	Cursory review by PMO: data matched against FPDS data
Award Date	Cursory review by PMO: data matched against FPDS data
Government Contracting Office Code	Cursory review by PMO: data matched against FPDS data
Program Source Code (TAS)	Cursory review by PMO: data matched against FPDS data
Primary Place of Performance address	Cursory review by PMO: data matched against FPDS data
Congressional District of performance	Cursory review by PMO: data matched against FPDS data
Activity Code (NAICS)	Cursory review by PMO: data matched against FPDS data
Final Report	CO review to ensure no significant error/omission exist
Total Number of Sub Awards to Individuals	CO is not expected to validate this data element. The CO should review for possible significant error or omission.
Total Amount of Sub Awards to Individuals	CO is not expected to validate this data element. The CO should review for possible significant error or omission.
Total Number of Sub Awards to <\$25,000/awards	CO is not expected to validate this data element. The CO should review for possible significant error or omission.
Total Amount of Sub Awards to <\$25,000/awards	CO is not expected to validate this data element. The CO should review for possible significant error or omission.
Award Description	CO review to ensure no significant error/omission exist
Project Status	CO review to ensure no significant error/omission exist
Total ARRA Funds Received/Invoiced	CO review - Comparison to invoiced amount
Number of Jobs	The CO is not expected to validate this data element.
Description of Jobs Created	If the contractor populated the number of jobs field the CO should review the job description to ensure it is clear and concise (e.g., "Two carpenter positions were created as a result of this award; Three electrician journeymen positions created).
Quarterly Activities/Project Description	CO review to ensure the description matches the award scope of work.
Recipient Highly Compensated Officers	The CO is not expected to validate this data element. However, if the contractor responded "yes" to this element the CO should ensure the contractor has actually listed the names and salaries of their employees.