

### **Agency Procurement Data Quality Report**

**Agency Name:** Millennium Challenge Corporation

**Fiscal Year of Reported Data:** 2011

#### **Agency Data**

Total Procurement Obligations for the fiscal year reported: \$66,260,929.64

Number of Actions Entered into FPDS: 861

#### **Part I - Data Quality Certification Statement**

I certify that:

- a) 100% of reportable contract actions awarded during FY 2011 for my agency have been entered into FPDS within appropriate time frames and in accordance with applicable guidelines<sup>1</sup>;
- b) The results reported in the Exhibit 2 were derived using the agency's data quality assurance procedures and appropriate sampling techniques;
- c) Agency policies, procedures, and internal controls include regular reviews of qualitative data, such as performance and integrity data, to assess the quality<sup>2</sup> of the information provided;
- d) Agency policies, procedures, and internal controls include regular reviews of contractor provided data, such as public information on Transparency requirements, to assess compliance with reporting requirements and the completeness of the data.

Explanation of Data Missing from Certification - MCC's 100% certification is based upon review of the sample contract actions for purposes of this validation and verification, in which every reportable action awarded by the Millennium Challenge Corporation's Contracts and Grants Management Division (CGM), MCC's headquarters contracting activity and the sole contracting activity for MCC, was found to have been reported (100%). MCC currently lacks an automated Contract Writing System and instead relies on a database of its contract actions to select actions for sampling purposes. MCC has procured an automated Contract Writing System that it will have implemented by the end of the 2<sup>nd</sup> Quarter of Fiscal Year 2012. While MCC's contract action database contained a number of actions in excess of the 861 reported to FPDS, those actions were found to be actions through Interagency Agreements, Grants, and Cooperative Agreements, all of which are recorded in MCC's database but which are not required to be reported to FPDS in accordance with FAR 4.606(b). An effort was also made to remove micropurchases from the sample but 3 instances of micropurchases were found in the sample after the validation and verification exercise had begun.

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<sup>1</sup> 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 Explanation of Data Missing from Certification section.

<sup>2</sup> Quality is defined by OMB Memorandum of February 8, 2010 *Open Government Directive – Framework for the Quality of Federal Spending Information*

[http://www.whitehouse.gov/sites/default/files/omb/assets/financial\\_pdf/Open\\_Government\\_Directive\\_02082010.pdf](http://www.whitehouse.gov/sites/default/files/omb/assets/financial_pdf/Open_Government_Directive_02082010.pdf)

**Part II - Assuring Data Input Accuracy**

**Controls over Data Input**

1. Provide the percent of the agency’s FPDS contract action reports (CARs) entered through the following means:

a. Contract Writing System(s) (automated)	<u>0%</u>
b. Web Portal (On-line login)	<u>100%</u>
c. Other (please provide description)	<u>0%</u>
Total	<u>100 %</u>

Please describe any “Other” method(s) used:

All entry was done manually through the web portal (on-line login) based on paper contract files as MCC lacks an automated Contract Writing system with a connection to FPDS. However, MCC has procured a Contract Writing System with a connection to FPDS and plans to fully implement the system by the end of the 2<sup>nd</sup> quarter of FY 2012.

**Data Quality Assurance Procedures – Updates to Agency Data Quality Plans**

In brief, please discuss the agency internal control procedures for data quality, referencing any information, updates, or changes to the agency data quality plan submitted to OMB on April 14, 2010 per OMB Memo of February 8, 2010 *Open Government Directive – Framework for the Quality of Federal Spending Information*. Please include:

*a) Any changes to the data quality plans submitted to OMB, for example incorporation of how past performance information will be assessed;*

Before its retirement, MCC utilized the NIH Contractor Performance System (CPS) for capturing its past performance information. After its retirement, MCC began researching and developing guidance and internal processes for utilizing the now Government-wide systems for entering that information, the Contractor Performance Assessment Rating System (CPARS) and the Architect-Engineer Contract Administration Support System (ACASS). MCC does not utilize CCASS as it does not directly engage in contracts for construction activities from its headquarters contracting activity.

MCC’s approach for implementing and complying with CPARS and ACASS has included internal training with both contracting staff and program staff engaged as Contracting Officer Representatives (CORs). MCC Contracting Officers are now required to initiate the CPARS or ACASS process with every option exercise on applicable MCC contracts. MCC is also running CPARS and ACASS auto-register utility on a monthly basis to ensure that all new contracts are registered in CPARS and ACASS, as well as a report to be provided to the SPE for all due and overdue actions beginning in the 2<sup>nd</sup> quarter of Fiscal Year 2012 so that appropriate action can be taken. MCC plans to continually increase participation in CPARS and ACASS to ensure that all

new contract actions and as many previous contract actions as possible are captured in CPARS and ACASS and the contractor past performance information is documented there.

*b) Examples of successful practices contributing to consistently high data quality;*

MCC is a small agency with limited resources and staff, however MCC does utilize several practices to bolster high data quality in regard to its procurement and financial data, including a bi-annual open obligations review and deobligation exercise, incorporation of FPDS reviews into the contract award review process, the chartering and initiation of the MCC Quality Review Board process, and other ad-hoc data reviews as any systematic issues with data quality are found.

*Bi-annual Open Obligations Review.* Twice per fiscal year, MCC conducts an open obligations review in which all contracts with obligated funds remaining that have been inactive (no disbursements or invoices) for over 12 months are evaluated and, if appropriate, excess funds are deobligated and the contracts are closed out. This process involves thorough engagement between MCC's Financial Management Division, MCC's Financial System Servicing Agency the National Business Center (contained in the Department of the Interior,) contractors, and Contracting Officer's Representatives. During the process funds that can be deobligated from the contracts are identified, as well as contracts that can be closed out due to the contractor receiving final payment and all goods and services having been received. During this process, MCC ensures that the proper amount of funding is deobligated and that all contract file documentation, including FPDS entries, are proper in terms of conducting a contract closeout. Data in MCC's financial system, paper contract files, and FPDS are all analyzed and reconciled if need be to ensure high data quality and conformity in all of those sources of data.

*Contract Review Process.* It is the standard MCC contract review process that the draft FPDS record be included in the file for review. This is reviewed by the Contracting Officer and aids in ensuring that the data entered into FPDS and in the fiscal contract file conform. This is prepared by the Contract Specialist, reviewed by the Contracting Officer, and also included in reviews by the HCA/SPE if the dollar amount of the contract action is over \$500,000.00. The FPDS data record is only finalized after this review has been completed and the document signed.

*MCC Quality Review Board Process.* Beginning with this FPDS Validation and Verification, MCC's CGM has established a Quality Review Board, including a charter for how the Board will operate. The Quality Review Board's membership, as indicated in the charter, consists of all levels of the organization, including Senior Directors, Team Leaders, and Contract Specialists. The Quality Review Board is an additional measure to ensure accuracy of data in both FPDS and in paper contract files by conducted a planned semi-annual or quarterly review, depending on staff availability, of 20% of contract actions awarded. While initially the Quality Review Board intends to focus on FPDS data accuracy when compared to contract files, MCC hopes to expand the process to cover review of common types of file documentation in the selected contract action for accuracy and quality. It is intended that the Quality Review Board will produce reports to be posted on the MCC intranet and will formulate internal trainings, "brown bag" sessions, and other discussions to address its findings and recommendations.

*Ad Hoc Reviews.* MCC regularly participates in Senior Procurement Executive calls with OFPP, and continually seeks to identify and improve data issues. As such, MCC often initiates direct reviews of contract files. Many of these reviews have prompted the MCC SPE to direct reviews of contract files for possible inaccuracies and corrections. One such example was in the area of “R” Product Service Codes (PSCs) and the goal to reduce spending in these codes by 15% as articulated by OMB in the November 7, 2011 memorandum “Reduced Contract Spending for Management Support Services.” In this particular case, several major contracts that would fall under such management support services were reviewed to ensure that they had been classified under the proper PSC. Many such records were corrected so that MCC can provide an accurate accounting of any reduced spending. Additional efforts included the following:

- Audit of physical paper files to examine sustainability clause inclusion in contracts
- Accuracy of data for ACASS auto-registration purposes
- Review of data to be migrated from existing contracts database to new automated Contract Writing System, including matching to FPDS PIIDs and importing FPDS data

In each case, data quality was assessed and increased as a result of these efforts and corrections to FPDS data or contract file documents that were in error.

*c) Examples of agency success with improving elements of procurement data quality;*

As referenced above, MCC has conducted several ad hoc reviews on issues relevant to procurement data quality. In many of these cases, significant numbers of records that had been classified under an inaccurate PSC were corrected as Contract Specialists and Contracting Officers were directed to re-examine base awards of task orders, Indefinite Delivery Vehicles (IDVs), and definitive contracts to correct information that may have been inaccurate. These efforts have resulted in a more accurate set of FPDS reports in identifying MCC’s spending in various PSCs as well as improving the auto-register success of contracts for CPARS and ACASS.

MCC also has undertaken the efforts to procure and implement an automated Contract Writing System to ensure that data quality improves. The Contract Writing System, to be identified as the CGM Contract Management System (CCMS) and based upon Distributed Solutions Inc.’s Automated Acquisition Management System (AAMS), will both upload data to FPDS and download data from FPDS once finalized to ensure both the Contract Writing System and FPDS conform. This will make any errors more visible and transparent to users and managers and better enable CGM to correct any errors or inaccuracies immediately.

In addition, CGM plans to do the following during FY 2012 to support continuous accuracy improvement of all data elements identified in Exhibit 2 that are not 100% accurate:

- Step up its Quality Review Board efforts, including running anomaly reports available through FPDS standard reports prior to each Quality Review Board internal audit of contract files and FPDS records
- Offer internal user training on FPDS elements that seem to be unclear or problematic to users

- More rigorously review draft FPDS records before contract actions are awarded, particularly in the area of IDVs

d) *Barriers or challenges identified through the agency review process for which OMB or GSA could offer support or solutions.*

MCC thinks that OMB and GSA could take many actions to improve the accuracy of procurement data and guidance available by exploring possible changes within FPDS, including the following:

*IDV CAR Correction.* Most of the errors cited in Exhibit 2 were due to inaccuracies in the CAR of base awards, particularly of IDVs. This included tying delivery/task orders to incorrect IDVs, creation of IDVs as definitive contract CARs and their orders as separate definitive contract CARs, and failure to link GSA Federal Supply Schedule (FSS) Blanket Purchase Agreements (BPAs) to the appropriate FSS in the initial award CAR. Any user creating a CAR for a base modification or a task order would not be able to correct such issues without deletion of every base modification, task order, and task order modification in order to recreate the entire series of CARs with a corrected base IDV CAR.

Such corrections could be accomplished with much less effort if the capability existed to change awarded action types in FPDS using the correction function or changing the IDV number associated with a given task order to the correct IDV record. Such flexibility would ensure that initial mistakes could be corrected more easily instead of a user having to delete dozens or hundreds of records and recreate them because of an initial IDV CAR that contained mistakes.

*Modifications and Changes in Basic Terms and Conditions.* Currently FPDS inherits many basic terms and conditions entered in the base CAR, including the initial contract type, for all modification. In certain circumstances, contract types on certain CLINs have changed but Contract Specialists have been unable to update the FPDS record to reflect that without changing the base CAR and all modification CARs after it. It would be a useful capability for FPDS to allow a greater number of fields to be edited during a contract modification, even if they carry forward data from previous modifications. This would ensure that changes to certain Terms and Conditions from the base award could be accurately captured in modifications to the CAR while leaving the base CAR and previous modification CARs intact.

*CCR Data.* Currently, FPDS imports contractor data from CCR. FPDS then allows the user to choose a NAICS code not available from the CCR record. FPDS should either limit the users choices to those NAICS codes contained in the CCR record or provide those as the initial choices available when a user utilizes the NAICS Code radio button in FPDS. This would drastically reduce inaccuracies in FPDS in terms of NAICS codes and would ensure greater conformity between CCR and FPDS entries.

*Product Service Code (PSC) Descriptions, Clarifications, and Guidance.* While PSC guidance is available, it is often difficult to locate via the FPDS website and only contains categories and lists of the codes with no definitions. Providing this guidance in an easy-to-locate place would help users understand PSCs and select accurate PSCs more often. In addition, there is a

substantial problem with the PSC description. In MCC’s review, it found that the most common error in CARs regarding PSCs consisted of the user selected an R&D Code (AD series) for a services contract. This is mostly because when searching for a PSC using the radio button in FPDS, users located descriptions such as “Services – Basic” or “Services – Advanced” with no indication that they were selecting a PSC for Advanced Research and Development. If the description for these PSCs contained “R&D” or other clarifying language as many of the other PSCs due, this would reduce procurement data errors. Such clarifications and additional guidance would be of great aid to the acquisition workforce.

**Part III – MCC’s Procurement Data Verification and Validation Process and Findings**

Overview of MCC Procurement Data Validation and Verification Process

MCC followed the process discussed in Exhibits 3 and 4 of the OMB Memorandum in developing the sample for its Procurement Data Quality Verification and Validation by taking all contract actions awarded in the past fiscal year as noted in its procurement database, removing identified unreportable actions such as Grants, Cooperative Agreements, and Interagency Agreement actions.

The remaining actions were grouped into four categories to form a stratified sample. Those groups were Definitive Contract actions, BPA actions (including FSS BPA orders), Indefinite Delivery Vehicle (IDV) actions, and FSS orders (excluding FSS BPA orders). All of MCC’s FPDS-reportable contracting actions fit within these four categories. To achieve 95% accuracy, a 20% sample was chosen from each of these four categories to develop a stratified sample. This was done through Microsoft Excel by diving the categories into separate worksheets, assigning each action a sequential number record, and using the sample function to draw the desired number of samples. This generated a stratified, random sample that is representative of the type of procurement actions MCC processes. The breakdown of the stratified sample is included in the following table:

**Table 1 – FPDS Verification and Validation Stratified Sample**

<b>Category</b>	<b>Sample Size</b>
Definitive Contract Actions	47(50)
BPA Actions	67
FSS Order Actions	17
IDV Actions	51
<b>Total</b>	<b>182</b>

With the sample selected, MCC convened a quality review board consisting of the SPE, a Procurement Analyst, a Contracting Officer/Team Leader, a Senior Contract Specialist, and a Junior Contract Specialist. Agreement was reached on standard definitions and criteria for each of the data elements based upon the OFPP memorandum and available guidance. The actions selected as part of the sample were then parsed out and assigned to each reviewer to begin the review process.

The review process consisted of reviewing the paper contract file when available against the record as entered in FPDS. In those few circumstances where the paper file was unavailable because it had contracting actions pending against it that were being worked on, the reviewer relied on scanned copies of the signed contractual documents and scanned copies of the file documents available on a share drive to complete the review.

During the review process, three definitive contract actions were identified as not reportable. Two were micropurchases that should have been excluded from the sample but were included, and the third was a miscellaneous obligation for purposes of holding hotel rooms that was eventually deobligated in its entirety and thus was also not necessary to report. This reduced the overall definitive contract actions in the sample from 50 to 47.

### Findings

Findings are displayed in Exhibit 2. The areas where MCC had the most errors and accuracy problems were most attributable to the existing user or a previous user. MCC’s contracting actions mostly consist of modifications, like many contracting activities, so most data elements that were incorrect in the CAR were due to flaws in the base award CAR that subsequent Contract Specialists had not returned to the original CAR to correct. So, in many cases, all the data the user was obliged to enter for the record was factually correct, but data carried over from previous modification CARs or base award CARs was incorrect and could not be corrected in subsequent CARs. In observing those fields that MCC had the most errors in, this pattern holds as all data elements with the lowest accuracy percentages are data elements that are closed or locked when entering a modification CAR and would have required the Contract Specialist to return to the base CAR to correct. As referenced in Tables 2 and 3 below, NAICS codes and PSCs were the biggest problem areas, and both of these codes are locked when the user inputs a modification.

While MCC has undertaken many activities in attempts to correct base CARs in the past, MCC is a small agency with limited staff and resources, no automated contract writing system, and has only been in existence since 2004. Many of MCC’s problematic base CARs were found to be several years old, such as from FY 2006 and FY 2007, when MCC was still in the process of firmly establishing its business processes. More recent base CARs tended to have a higher rate of accuracy.

**Table 2 – Accuracy Percentage by Action Type**

Data Element	BPA Total	DC Total	GSA Total	IDV Total	Grand Total
2A	82%	83%	88%	94%	88%
2C	85%	98%	94%	86%	91%
2D	82%	94%	94%	86%	89%
2E	82%	98%	100%	92%	92%
3A	83%	89%	88%	94%	90%
3B	83%	87%	94%	92%	90%
3C	86%	91%	94%	90%	91%

4C	86%	100%	100%	98%	96%
6A	79%	96%	100%	92%	91%
6F	86%	100%	82%	96%	94%
6M	86%	98%	100%	94%	94%
8A	83%	87%	94%	75%	85%
8G	23%	74%	82%	98%	65%
9A	86%	96%	94%	98%	94%
9H	86%	100%	100%	96%	96%
9K	86%	100%	100%	96%	96%
10A	83%	94%	100%	96%	93%
10C	76%	98%	100%	96%	91%
10D	80%	96%	94%	96%	92%
10N	83%	98%	100%	98%	94%
10R	83%	98%	100%	96%	94%
11A	83%	87%	100%	94%	91%
11B	83%	100%	100%	94%	94%
12A	85%	100%	94%	94%	94%
12B	83%	100%	100%	94%	94%

**Table 3 – Lowest Accuracy Data Elements ( ≤ 90%)**

<b>Data Element</b>	<b>Grand Total</b>
2A – Date Signed	88%
2D – Ultimate Completion Date	89%
3A – Base and All Options Value	90%
3B – Base and Exercised Options Value	90%
8A – Product/Service Code	85%
8G – NAICS Code	65%

Table 2 identifies the breakdown of accuracy for each data element by type of actions. Table 3 focuses on which actions had the lowest accuracy percentages, defined as 90% or lower. The following were particularly problematic areas:

*NAICS Codes.* As both tables identify, NAICS Code errors were the highest, but were predominantly focused in BPAs. As most of MCC’s BPAs are FSS BPAs, this makes sense as FSS BPAs are largely driven by GSA information and focus on FSS Special Item Numbers (SINs) that do not easily map to NAICS codes as articulated in CCR. NAICS codes are seldom identified during the solicitation process for an FSS action, whereas the accuracy of NAICS Codes identified for IDV actions were high as MCC competed those actions through full and open competition via FBO.gov where a NAICS code must be identified at the outset of the requirement. MCC Users have been directed not to utilize any NAICS codes for FPDS entries in the future unless the NAICS Code appears on the contractor’s CCR entry.

*PSCs.* Many users seem confused by PSCs, as the FPDS guidance for them only lists the PSCs and provides no definitions for them. Additionally, it is very difficult to search for relevant PSCs utilizing the FPDS radio button in the FPDS interface. Often, users mistakenly chose R&D-type codes for standard services or support services as a search for “services” turned up “services-basic,” “services-advanced,” etc. Without FPDS signifying that such PSCs are R&D PSCs in the description, users select these PSCs without understanding that they are not just “services” but R&D services. MCC has encouraged users to review the entire listing of PSCs available via the FPDS website to gain a greater understanding of the PSCs available and appropriate to MCC requirements. MCC also intends to incorporate this issue into internal trainings and develop written guidance for PSCs to cover the common types of MCC requirements.

*Date Signed.* The most common explanation for the date signed issue is simply users failing to update this field when finalizing draft records, resulting in date signed variances of one to two days. MCC’s implementation of a contract writing system that updates the CAR with the current date when signed should help correct that error, but users have been directed to pay special attention to updating the field when moving from a draft to a final record.

*Ultimate Completion Date, Base and All Options Value, Base and Exercised Options Value.* Inaccuracies under these categories seem to simply consist of users misunderstanding differences between current completion date, exercised options, and all options. Often identical values are entered for current and ultimate completion date as users interpret ultimate completion date as being the end of the exercised option period rather than the final option period. Similar issues occurred with base and exercised options value and base and all options value, where users entered the same data or, for modification CARs, had an incorrect understanding that they were to enter that data repeatedly in the “current” field for every modification instead of leave the value unchanged when the modification did not affect exercised or all options value. MCC will address this confusion in internal training to users.

*“Other” Systematic Causes of Invalid Data.* In cases below where “other” was selected, it was most often due to incomplete file documentation, where the selection of the data in FPDS was not supported by the paper file, or due to the fact that it was a modification CAR and the base CAR was incorrect so invalid data was carried forth into the modification. As stated above, this was the most common source of invalid date for MCC.

### Corrective Action Plan

MCC acknowledges that it must improve its procurement data quality, and has already begun to undertake many actions in FY 2012 that should increase the accuracy of procurement data and should improve results for FY 2012. These consist of the following initiatives:

*Quality Review Board.* The Quality Review Board will publish a more detailed report for internal consumption that highlights the lessons learned and recommends particular areas of emphasis for improving MCC’s review process. This will include special attention to new base CARs, especially base IDV CARs, as many of the modification records had errors based on data carried forward from hose CARs. It will also include special attention to data elements identified in Table 3:

- NAICS Codes
- Product Service Codes
- Date Signed
- Ultimate Completion Date
- Differentiation between the Base and All Options Values and the Base and Exercised Options Values

The Quality Review Board will continue to meet quarterly, starting after the conclusion of 2<sup>nd</sup> quarter FY 2012, to review all previous awards at that point during the fiscal year. This should allow adequate time to correct problems encountered during the fiscal year and improve accuracy going forward as opposed to waiting on solely the annual verification and validation.

Implementation of Contract Writing System. MCC has procured and is in the process of implementing a Contract Writing System through the CGM Contract Management System (CCMS) project. CCMS is based upon Distributed Solutions Inc.'s Automated Acquisition Management System (AAMS) and contains as one of its principal features the ability to connect and upload data to FPDS, as well as download data. It also generates contract documents from the same sets of data fields. This should ensure that MCC's accuracy in terms of FPDS data increases with all future awarded actions.

User Training. MCC also intends to develop an internal training based upon those FPDS data elements with the lowest accuracy levels, as noted in Table 2, including brown bag sessions to discuss the findings of this validation and verification, and the recommendation that CGM staff take the continuous learning module SPS 101 FPDS-NG User, available through FAI/DAU to gain further knowledge of FPDS and FPDS data elements.

### Conclusion

MCC is committed to achieving improvements in its procurement data quality and accuracy during FY 2012. MCC may be a small agency with limited staff and resources, but the implementation of a contract writing system, standing Quality Review Board, and internal training efforts should go a long way toward correcting misunderstandings and errors among its FPDS users. As such, MCC views this annual verification and validation as an important exercise and an opportunity to identify data quality problems for purposes of improvement in this fiscal year and subsequent fiscal years.

**Agency Name:** Millennium Challenge Corporation **Fiscal Year of FPDS Data:** 2011 **Accuracy Rate of Sample:** 95%

Percent of Total Procurement Spend Covered by Sample: 21.26%

Data Element Name	Accuracy Computation for Key Data Elements			Systemic Causes of Invalid Data		
	(Column A) No. of CARs Reviewed <sup>3</sup>	(Column B) No. of Correct CARs	(Column B/ Column A as %) Accuracy Rate	(Check all that apply)		
				User	FPDS	Other
2A Date Signed	181	159	88%	X		X
2C Completion Date	181	165	91%	X		X
2D Est. Ultimate Completion Date	181	161	89%	X		X
2E Last Date to Order	181	167	92%	X		X
3A Base and All Options Value	181	163	90%	X	X	X
3B Base and Exercised Options Value	181	162	90%	X		X
3C Action Obligation	181	165	91%	X		X
4C Funding Agency ID	181	174	96%	X		
6A Type of Contract	181	164	91%	X		X
6F Performance Based Service Acquisition	181	170	94%	X		X
6M Description of Requirement	181	171	94%	X		X
8A Product/Service Code	181	153	85%	X		X
8G Principal NAICS Code	181	117	65%	X	X	X
9A DUNS No	181	171	94%	X		X
9H Place of Manufacture	181	173	96%	X		X
9K Place of Performance ZIP Code (+4)	181	173	96%			X
10A Extent Competed	181	168	93%	X	X	X
10C Other than Full & Open Competition	181	165	91%			X
10D Number of Offers Received	181	166	92%	X		X
10N Type of Set Aside	181	171	94%			X
10R Fair Opportunity/Limited Sources	181	170	94%			X
11A CO's Determination of Business Size Selection	181	164	91%	X		X
11B Subcontract Plan	181	170	94%			X
12A IDV Type	181	170	94%			X
12B Award Type	181	170	94%			X
Total Records Sampled	181					

<sup>3</sup> Total number of contract action reports reviewed for which this data element was required.

MCC FY 2011 Submission – Exhibits 1 and 2  
Annual Verification and Validation of MCC Procurement Data – Fiscal Year 2011