



# U.S. DEPARTMENT OF HOMELAND SECURITY **OFFICE OF INSPECTOR GENERAL**

OIG-25-16

February 10, 2025

**FINAL REPORT**

## **DHS Followed Applicable Regulations for Awarding Grants and Contracts Awarded by Any Means Other Than Full and Open Competition During Fiscal Year 2024**





# OFFICE OF INSPECTOR GENERAL

U.S. Department of Homeland Security

Washington, DC 20528 | [www.oig.dhs.gov](http://www.oig.dhs.gov)

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February 10, 2025

MEMORANDUM FOR: Paul Courtney  
Chief Procurement Officer  
Department of Homeland Security

FROM: Joseph V. Cuffari, Ph.D. **JOSEPH V CUFFARI**  
Inspector General

SUBJECT: *DHS Followed Applicable Regulations for Awarding Grants and Contracts Awarded by Any Means Other Than Full and Open Competition During Fiscal Year 2024*

Digitally signed by JOSEPH V CUFFARI  
Date: 2025.02.10 10:39:20 -05'00'

Attached is our final report, *DHS Followed Applicable Regulations for Awarding Grants and Contracts Awarded by Any Means Other Than Full and Open Competition During Fiscal Year 2024*. We contracted with the independent accounting firm Williams, Adley & Company-DC, LLP (Williams Adley) to perform this audit. The contract required that the audit be performed in accordance with U.S. generally accepted government auditing standards. Williams Adley is responsible for the attached report, dated January 31, 2025, and the conclusions expressed in it. The Department provided technical comments on the draft report, and Williams Adley took the Department's components' suggested changes into consideration. Williams Adley's report contains no recommendations.

Consistent with our responsibility under the *Inspector General Act*, we will provide copies of our report to congressional committees with oversight and appropriation responsibility over the Department of Homeland Security. We will post the report on our website for public dissemination.

Please contact me with any questions, or your staff may contact Kristen Bernard, Deputy Inspector General for Audits, at (202) 981-6000.

Attachment



# DHS OIG HIGHLIGHTS

## DHS Followed Applicable Regulations for Awarding Grants and Contracts Awarded by Any Means Other Than Full and Open Competition During Fiscal Year 2024

February 10, 2025

### Why We Did This Audit

On March 23, 2024, Congress enacted Public Law 118-47, *Further Consolidated Appropriations Act, 2024*. According to Division C, section 101(a), the Secretary of DHS shall submit a report, not later than October 15, 2024, to the DHS Office of Inspector General listing all grants and contracts awarded by any means other than full and open competition (OTFOC) during FY 2024. We contracted with Williams Adley to review the grants and contracts awarded by any means other than full and open competition and assess DHS' compliance with applicable laws, regulations, and departmental procedures.

### What We Recommend

Williams Adley made no recommendations.

**For Further Information:**

Contact our Office of Public Affairs at (202) 981-6000, or email us at: [DHS-OIG.OfficePublicAffairs@oig.dhs.gov](mailto:DHS-OIG.OfficePublicAffairs@oig.dhs.gov).

### What We Found

Williams, Adley & Company-DC, LLP (Williams Adley), under contract with the Department of Homeland Security Office of Inspector General, concluded that DHS complied with applicable statutes, regulations, and policies governing grants and contracts awarded by any means other than full and open competition in fiscal year 2024. During that year, DHS awarded 27 noncompetitive grants worth approximately \$22 million and 374 noncompetitive contracts worth approximately \$2.3 billion through means other than full and open competition.

Williams Adley noted an administrative oversight where the contract action report for one contract was not completed in the Federal Procurement Data System-Next Generation within 30 business days, as required by Federal Acquisition Regulation 4.604(b)(2). However, Williams Adley determined that the nature of this exception did not warrant any recommendations.

### DHS Response

The Department elected to forego providing a formal management response to the draft report. The Department provided technical comments on the draft report, and Williams Adley took the Department's suggested changes into consideration.

**Performance Audit of Grants and Contracts Awarded  
Through Other Than Full and Open Competition (OTFOC) During FY2024**

**January 31, 2025**





January 31, 2025

Joseph V. Cuffari, PH.D.  
Inspector General  
U.S. Department of Homeland Security  
Office of Inspector General

Dear Mr. Cuffari:

Williams, Adley & Company-DC, LLP (Williams Adley) performed an audit of DHS's Report on Grants and Contracts Awarded through Other Than Full and Open Competition during fiscal year 2024. Williams Adley performed the audit under contract with the Department of Homeland Security (DHS), Office of Inspector General (OIG); specifically, in accordance with Task Order No. 70VT1524F00032, signed August 20<sup>th</sup>, 2024, effective August 26<sup>th</sup>, 2024. This report presents our audit results.

We conducted our audit in accordance with the applicable Government Auditing Standards, 2018 revision, Technical Update April 2021. The audit was a performance audit as defined by Chapter 8 of the Standards. As part of our guidance, we also utilized FAR 6.3 and 10 U.S.C. §3204(a).

We appreciate the opportunity to have conducted this audit. Should you have any questions, or if we can be of any further assistance, please contact me at (202) 371-1397 or [lsouthers@williamsadley.com](mailto:lsouthers@williamsadley.com).

Sincerely,

A handwritten signature in blue ink that reads 'Leah Southers'.

Leah Southers, CPA, CISA, CGFM, CFE  
Partner

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## Table of Contents

Executive Summary .....	1
Background .....	1
Engagement Objective.....	3
Scope .....	3
Criteria .....	3
Methodology .....	4
Audit Results.....	4
Noncompetitive Grants Reported in Fiscal Year 2024 .....	5
DHS Certifications .....	5
Noncompetitive Contracts Reported in Fiscal Year 2024.....	5
Conclusion.....	6
Appendix I- Report of Grants and Contracts Awarded by Any Means Other than Full and Open Competition during Fiscal Year 2024.....	7
Appendix II – Williams Adley’s Summary of the Department’s Reports – Fiscal Year 2024 Data	9
Appendix III – The Department’s Fiscal Year 2024 Federal Procurement Data System Reporting Certification Memorandum.....	11

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## Executive Summary

We completed an independent performance audit of the DHS’s Report on Grants and Contracts Awarded by Any Means Other Than Full and Open Competition (OTFOC) during Fiscal Year 2024 (Department’s Report)<sup>1</sup>. The audit included a review of approximately \$22 million in grants and \$320 million in contracts awarded by any means OTFOC.

Overall, we determined that the Department’s Report was accurate, with the exception of one contract (see more details in the [Audit Results](#) section). We determined that information related to these grants and contracts recorded in the Federal Procurement Data System – Next Generation (FPDS-NG)<sup>2</sup>, SAM.gov<sup>3</sup>, and in USAspending.gov<sup>4</sup> is accurate. DHS also followed written policies and procedures when awarding grants and contracts noncompetitively. This report contains no recommendations.

## Background

According to the Competition in Contracting Act of 1984, with limited exceptions, contracting officers are required to promote and provide for full and open competition in soliciting offers and awarding Federal Government contracts. The Federal Acquisition Regulation (FAR) codifies uniform policies for acquiring supplies and services by executive agencies and requires Federal agencies to collect and report data to the FPDS-NG.

The Government uses the data in the FPDS-NG to measure and assess the impact of Federal procurement on the Nation’s economy; the system includes information on funds obligated and the extent of competition. The Office of Federal Procurement Policy requires Federal agencies to certify annually that contract data entered into the FPDS-NG is accurate and complete.

On September 26, 2006, the Congress enacted P.L. 109–282, *Federal Funding Accountability and Transparency Act of 2006* (FFATA). Section 2(b)(1) of the law required the Office of Management and Budget (OMB) to ensure the existence and operation of a single searchable website for all Federal grants and contracts. FFATA requires that entries be updated not later than 30 days after the award of any Federal award requiring a posting. The transparency requirements set in place by

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<sup>1</sup> See Appendix II to view Williams Adley summary charts of the Department’s Reports in full detail.

<sup>2</sup> Federal agencies use FPDS-NG to report all contract actions, including modifications, using appropriated funds for contracts whose estimated value is at or above \$10,000. The General Services Administration (GSA) administers FPDS-NG.

<sup>3</sup> System for Award Management (SAM.gov) is a repository for Federal Government trading partners’ business information in support of contract and grant awards and electronic payment processes. It provides detailed descriptions of Federal assistance listings available to various levels of government. The General Services Administration (GSA) manages SAM.gov.

<sup>4</sup> USAspending.gov is the official source for spending data for the United States Federal Government. Its mission is to show the American public what the Federal government spends every year and how it spends the funding. Users can follow the funding from Congressional appropriations to Federal agencies, down to local communities and businesses.

FFATA were later expanded through the passage of the *Digital Accountability and Transparency Act of 2014*,<sup>5</sup> which establishes Federal standards for financial data and a new reporting process for agencies to improve data quality, transparency, and accountability.

FPDS-NG data is used to populate contract data in USAspending.gov and SAM.gov, which are searchable databases of information on Federal contract and Government assistance such as grants and cooperative agreements. The contract information used to populate USAspending.gov is automatically extracted from the FPDS-NG by the U.S. Department of Treasury.<sup>6</sup>

On March 23, 2024, Congress enacted Public Law 118-47, Further Consolidated Appropriations Act, 2024. According to Division C, Title 1, Section 101 (a) of the law, the Secretary of Homeland Security shall submit a report not later than October 15, 2024, to the Inspector General of the Department of Homeland Security listing of all grants and contracts awarded by any means other than full and open competition during fiscal years 2023 or 2024. Section 101 (b) requires the Inspector General to review the report required by subsection (a) to assess Departmental compliance with applicable laws and regulations and report the results of that review to the Committees on Appropriations of the Senate and the House of Representatives not later than February 15, 2025. DHS OIG contracted with Williams Adley to perform the audit of fiscal year 2024.

According to Federal Acquisition Regulations (FAR) 6.301, executive agencies (with exceptions) may authorize, under certain conditions, contracting without providing for full and open competition. Contracting without providing for full and open competition or full and open competition after exclusion of sources is a violation of statute, unless permitted by one of the exceptions in FAR Section 6.302. For example, contracts awarded through other than full and open competition is permitted when:

- Only one responsible source and no other supplies or services will satisfy agency requirements;
- The need for the supplies or services is of such an unusual and compelling urgency that the Government would be seriously injured unless the agency is permitted to limit the number of sources from which it solicits bids or proposals;
- It is necessary to award the contract to a particular source or sources in order to: (1) maintain a facility, producer, manufacturer, or other supplier available for furnishing supplies or services in case of a national emergency or to achieve industrial mobilization; (2) establish or maintain an essential engineering, research, or development capability to be provided by an educational or other nonprofit institution or a federally funded research and development center; or (3) to acquire the services of an expert or neutral person for any current or anticipated litigation or dispute;
- Precluded by the terms of an international agreement or a treaty between the United States and a foreign government or international organization;

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<sup>5</sup> Public Law 113-101.

<sup>6</sup> The U.S. Department of Treasury utilizes a system called the DATA Act Broker to extract data from FPDS-NG, and other systems, for inclusion in USAspending.gov.



- A statute expressly authorizes or requires that the acquisition be made through another agency or from a specified source;
- The disclosure of the agency's needs would compromise the national security; or
- the agency head determines that it is not in the public interest in the particular acquisition concerned.

## Engagement Objective

We conducted a performance audit to assess DHS's compliance with applicable statutes, regulations, and policies governing grants and contracts awarded by OTFOC during fiscal year 2024. Specifically, our objectives were to:

- Determine the accuracy of the Department's annual report detailing all grants and contracts awarded by OTFOC;
- Ensure that all contracts awarded by OTFOC were properly recorded into the FPDS-NG;
- Ensure that all grants and contracts awarded by OTFOC were properly included in the USAspending.gov;
- Confirm the existence and use of processes to compare and report the accuracy of spending information against the official record of agency accounts at quarterly intervals;
- Ensure all agency contracts awarded by any means OTFOC were in full compliance with the following FAR Sections:
  - FAR 6.301 - Policy
  - FAR 6.302 - Circumstances Permitting Other than Full and Open Competition
  - FAR 6.303 - Justifications
  - FAR 6.304 - Approval of the Justification; and
- Ensure all U.S. Coast Guard contracts awarded by OTFOC complied with 10 U.S.C. §3204(a).

## Scope

We audited the Department's Report for the period October 1, 2023 to September 30, 2024.

## Criteria

The following criteria are applicable to this audit:

- Government Auditing Standards, also known as Generally Accepted Government Auditing Standards (GAGAS), issued by the Comptroller General of the United States ([GAO-21-368G](#))
- Generally Accepted Auditing Standards (GAAS), issued by the AICPA
- Statements on Standards for Attestation Engagements No.18 (SSAE 18)
- FAR 6.301 - Policy
- FAR 6.302 - Circumstances Permitting Other Than Full and Open Competition
- FAR 6.303 - Justifications
- FAR 6.304 - Approval of the Justification
- 10 U.S.C. §3204(a) - For U.S. Coast Guard Contracts

- Public Law 118-47, Further Consolidated Appropriations Act, 2024

## Methodology

To achieve our audit objectives, we performed the following:

- Reviewed DHS and component policies, procedures, and other guidance to gain an understanding of their processes and controls in place regarding awarding grants and contracts by OTFOC.
- Assessed the adequacy of DHS's process for certifying FPDS-NG data quality in accordance with the Office of Management and Budget Memorandum – *Improving Federal Procurement Data Quality – Guidance for Annual Verification and Validation*, reviewed DHS' Annual Certification of FPDS-NG Data Quality for fiscal year 2024, and performed inquiries of any discrepancies noted.
- Compared key data elements between the Department's list and list of contracts in the SAM.gov to determine completeness and accuracy.
- Compared the Department's list to SAM.gov data.
- Selected a statistically-valid, random sample of contracts awarded by OTFOC. We selected 45 sample items with a total contract value of \$320 million. We reviewed supporting documentation provided by DHS, as described in the Results of Audit section. We reviewed contract and procurement files to determine whether the contracts sampled complied with FAR and 10 U.S.C. §3204(a) guidance on OTFOC procurements, as applicable.
- Reviewed and compared 27 grants from the Department's Report awarded by OTFOC, with a total dollar value of \$22 million, to USAspending.gov.

We conducted this performance audit in accordance with GAGAS between October 9, 2024 and January 27, 2025. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

## Audit Results

During fiscal year 2024, DHS awarded 27 noncompetitive grants totaling \$22 million. DHS's annual report also listed 373 contracts awarded by means other than full and open competition, obligating \$2.3 billion to noncompetitively procure goods and services.

As required by Public Law No. 118-47, *Further Consolidated Appropriations Act, 2024* Division C, Title 1, Section 101 (a), we reviewed DHS's fiscal year 2024 noncompetitive contracts report to assess Departmental compliance with applicable laws, regulations, and Departmental procedures.

Based on our testing, we confirmed that DHS' report was understated by one (1) contract and the actual number of the OTFOC contracts awarded during fiscal year 2024 was 374, with a total obligated amount of \$2,307,910,895. For the one (1) contract identified, the individual contract action report (CAR) was not completed in FPDS-NG within 30 business days, as required by FAR

4.604(b)(2), due to administrative oversight resulting in a delayed entry. This resulted in the Department's Report being understated by one (1) contract and by \$319,500. **One exception noted.**

## Noncompetitive Grants Reported in Fiscal Year 2024

During fiscal year 2024, DHS issued 27 noncompetitive grants totaling \$21,700,956.<sup>7</sup> All of the grants reported pertain to DHS's Homeland Security BioWatch Program grant program<sup>8</sup> administered by DHS's Countering Weapons of Mass Destruction (CWMD) office. We compared the Department's Report for all 27 grants with key data elements recorded in USAspending.gov. We found that the Department's Report of OTFOC grants agreed with USAspending.gov without exception.

## DHS Certifications

We obtained and reviewed the FPDS annual data quality report, which was submitted to the General Services Administration (GSA) on January 24, 2025 (See Appendix III). We determined the report was in compliance with [FAR 4.604\(c\)](#), which requires the chief acquisition officer of each agency to report whether, and to what degree, agency contract action (CAR) data is complete and accurate within 120 days after the end of each fiscal year. We determined that DHS was unable to certify 100% of its reportable contract actions. As a result, we conducted inquiries to the Department about the incomplete CAR data and received explanations that we deemed as reasonable. We concluded that the Department's annual certifications of FPDS data quality resulted in no exceptions.

## Noncompetitive Contracts Reported in Fiscal Year 2024

During fiscal year 2024, DHS's annual report listed 373 contracts awarded by means other than full and open competition, with a total obligated amount of \$2,307,591,395 (See Appendix II). From these contracts, we selected a statistically valid, random sample of 45 contracts with a total obligated amount of \$320,441,663. We reviewed the contracts and supporting documentation, such as the justification and approval form, market research, and evidence of a review process. We determined that DHS followed proper procedures and had valid justification for awarding the contracts noncompetitively. We also compared key data elements (such as contracting agency, Procurement Instrument Identifier, description of contract, extent competed, and amount obligated) from the Department's Report to the data recorded in the FPDS-NG to ensure that samples were properly reported in FPDS-NG.

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<sup>7</sup> For the purposes of this report, DHS defines full and open competition related to grants as *"a selection process that is open to the broadest class of applicants permitted by a program's authorizing statute that uses selection criteria that are consistent with any statutorily established requirements"*. See Appendix II for more information.

<sup>8</sup> Assistance Listing Number 97.091.

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However, as previously mentioned, we confirmed that DHS's report was understated by one (1) record, and the actual number of the OTFOC contracts awarded during fiscal year 2024 was 374, with a total obligated amount of \$2,307,910,895.

## **Conclusion**

Based on our audit of the Department's Report for fiscal year 2024, we conclude that DHS followed written policies and procedures when awarding grants and contracts noncompetitively with the exception of one (1) instance of noncompliance related to FAR 4.604(b)(2). Because this instance of noncompliance, which resulted in a delayed entry, is due to an administrative oversight, we determined that the nature of the exception did not warrant any recommendations.

During this audit, DHS provided timely responses to our requests for information and did not delay or deny access to information we requested.

## Appendix I- Report of Grants and Contracts Awarded by Any Means Other than Full and Open Competition during Fiscal Year 2024

U.S. Department of Homeland Security  
Washington, DC 20528



**Homeland  
Security**

MEMORANDUM FOR: Joseph V. Cuffari  
Inspector General

FROM: Stacy Marcott  
Acting Chief Financial Officer

SUBJECT: Report of Grants Awarded by Any Means Other than Full and  
Open Competition during Fiscal Years 2023 and 2024

The attached file constitutes the Department of Homeland Security (DHS), Office of Chief Financial Officer's (OCFO) report to the Department's Inspector General listing of all grants awarded by any means other than full and open competition (OTFOC) during fiscal years (FY) 2023 and 2024.

Public Law 118-47, Division C, Title I, Section 101(a) requires "The Secretary of Homeland Security shall submit a report not later than October 15, 2024, to the Inspector General of the Department of Homeland Security listing all grants and contracts awarded by any means other than full and open competition during fiscal years 2023 or 2024." The ambiguity of the phrase "awarded by any means other than full and open competition" as it pertains to grants had been a topic of discussion during audits performed by the Inspector General to assess DHS compliance with applicable laws and regulations.

The OCFO's Financial Assistance Policy and Oversight Division (FAPO) consulted with the DHS Office of General Counsel (OGC) and Components to define competition for the annual OTFOC report. To prepare this OTFOC report for grants, full and open competition has been defined as:

*A selection process that is open to the broadest class of applicants permitted by a program's authorizing statute that uses selection criteria that are consistent with any statutorily established requirements.*

FAPO developed written procedures for generating the required report to sufficiently identify, review, and validate non-competitive grant award information as required by OIG 21-17 Recommendation 2. FAPO followed the standard operating procedure that created a consistent methodology to identify, review, and validate reportable awards for the annual OTFOC report.

The table below summarizes the attached grants data. (See Attachment A: OTFOC FY 2024 DHS Grants Data 2024.10.31)

## Grants and Contracts Awarded by Any Means Other Than Full and Open Competition

Page 2

Component	FY 2023 (as of 10/31/24)	FY 2024 (as of 10/31/2024)
Countering Weapons of Mass Destruction (CWMD) 97.091: <del>Biowatch</del>	\$17,420,770	\$21,700,956

The Grants and Financial Assistance Division (GFAD) of DHS Office of the Chief Procurement Officer (OCPO) is the source of the CWMD information. Please direct any follow-up inquiries to Ms. Marsha Mathis, [Marsha.Mathis@hq.dhs.gov](mailto:Marsha.Mathis@hq.dhs.gov).

Attachment:

A. OTFOC FY 2024 DHS Grants Data 2024.10.31

## Appendix II – Williams Adley’s Summary of the Department’s Reports – Fiscal Year 2024 Data

### OTFOC Grants Summary

Award Number	Federal Award Amount	Date Funds Awarded	Fiscal Year
2006ST091000001	\$1,418,860	5/31/2024	2024
2006ST091000002	\$1,414,339	5/31/2024	2024
2006ST091000003	\$792,851	5/30/2024	2024
2006ST091000004	\$457,827	5/30/2024	2024
2006ST091000006	\$359,040	5/30/2024	2024
2006ST091000007	\$502,240	5/30/2024	2024
2006ST091000008	\$504,465	5/30/2024	2024
2006ST091000010	\$886,744	5/30/2024	2024
2006ST091000013	\$647,393	5/30/2024	2024
2006ST091000014	\$107,112	5/30/2024	2024
2006ST091000015	\$317,037	5/30/2024	2024
2006ST091000016	\$135,290	5/30/2024	2024
2006ST091000017	\$502,188	5/30/2024	2024
2006ST091000018	\$488,708	5/30/2024	2024
2006ST091000019	\$354,401	5/30/2024	2024
2006ST091000022	\$229,259	5/30/2024	2024
2006ST091000023	\$363,500	5/30/2024	2024
2006ST091000024	\$1,015,201	5/31/2024	2024
2006ST091000025	\$947,869	5/30/2024	2024
2006ST091000026	\$2,447,606	5/31/2024	2024
2011OH091000028	\$1,650,334	5/31/2024	2024
2012OH091000029	\$490,531	5/30/2024	2024
2013OH091000030	\$1,513,769	5/31/2024	2024
2014OH091000031	\$1,137,459	5/31/2024	2024
2015OH091000032	\$267,026	5/30/2024	2024
2015OH091000033	\$2,358,544	5/31/2024	2024
2016OH091000034	\$391,363	5/30/2024	2024
<b>Award Total:</b>	<b>\$21,700,956</b>	N/A	N/A

**OTFOC Contracts Summary**

<b>Component</b>	<b>No. of Contracts</b>	<b>Total Contract Value</b>
U.S. Coast Guard	115	\$ 1,058,161,855
U.S. Customs and Border Protection	124	\$641,236,582
U.S. Immigration and Customs Enforcement	28	\$34,721,553
Transportation Security Administration	12	\$90,052,109
Federal Emergency Management Agency	35	\$222,617,073
Office of Procurement Operations	18	\$71,388,428
U.S. Citizenship and Immigration Services	9	\$95,809,682
U.S. Secret Service	29	\$90,819,929
Federal Law Enforcement Training Centers	3	\$2,784,184
<b>Contact Total:</b>	<b>373</b>	<b>\$2,307,591,395</b>



## Appendix III – The Department’s Fiscal Year 2024 Federal Procurement Data System Reporting Certification Memorandum

U.S. Department of Homeland Security  
Washington, DC 20528




**Homeland  
Security**

**MEMORANDUM FOR** Mathew Blum  
Acting Administrator for Federal Procurement Policy  
Office of Management and Budget

**FROM:** Paul R. Courtney  
Senior Procurement Executive  
Chief Procurement Officer

**SUBJECT:** U. S. Department of Homeland Security Fiscal Year 2024  
Federal Procurement Data System Reporting Certification

  
Digitally signed by  
PAUL R. COURTNEY  
Date: 2025.01.23  
13:54:49 -05'00'

The U.S. Department of Homeland Security (DHS) hereby submits the subject certification in accordance with the instructions provided in the Office of Management and Budget memorandum dated May 31, 2011, with the subject line, “Improving Federal Procurement Data Quality - Guidance for Annual Verification and Validation.” Attached please find the following:

- Exhibit 1, Certification of FY 2024 Procurement Data Submission for Federal Procurement Data System (FPDS); and
- Exhibit 2, Data Accuracy Rates for Key Data Elements

The overall DHS accuracy rate for FY 2024 is 97.5 percent. In FY 2024, all 25 data elements scored above 90 percent and 19 of 25 data elements scored above 95 percent.

I certify that the information provided is current, complete, and accurate to the best of my knowledge as of the date of my signature. If you have questions or require additional information, please contact Pamela Campbell, Director, Acquisition Systems, DHS Office of the Chief Procurement Officer at (202) 577-9435 or email [Pamela.Campbell@hq.dhs.gov](mailto:Pamela.Campbell@hq.dhs.gov).

**Attachments:**

- Exhibit 1: Certified FY 2024 Procurement Data Quality Report
- Exhibit 2: Data Accuracy Rates for Key Data Elements



## Federal Procurement Data System Independent Verification & Validation Fiscal Year 2024 Exhibit II

Accuracy Rate of Sample: 97.5%

V&V Sample Spend \$6,750,175,163 / Total Spend \$23,540,723,419.47

Percent of Total Procurement Spend Covered by Sample: 26.6%

Data Element Name	Accuracy Computation for Key Data Elements		
	No. of CARs Reviewed	No. of Correct CARs	Accuracy Rate
2A Date Signed	1,278	1,196	93.6%
2C Completion Date	1,188	1,123	94.5%
2D Est. Ultimate Completion Date	1,186	1,120	94.4%
2E Last Date to Order	91	83	91.2%
3A Base and All Options Value	1,280	1,240	96.9%
3B Base and Exercised Options Value	1,280	1,258	98.3%
3C Action Obligation	1,280	1,276	99.7%
4C Funding Agency ID	1,280	1,280	100.0%
6A Type of Contract	1,279	1,268	99.1%
6F Performance Based Service Acquisition	1,279	1,260	98.5%
6M Description of Requirement	1,279	1,261	98.6%
8A Product/Service Code	1,280	1,270	99.2%
8G Principal NAICS Code	1,280	1,251	97.7%
9A DUNS/UEI No	1,279	1,164	91.0%
9H Place of Manufacture	1,188	1,188	100.0%
9K Place of Performance Zip Code plus 4	1,280	1,214	94.8%
10A Extent Competed	1,277	1,262	98.8%
10C Other than Full and Open Competition	1,279	1,269	99.2%
10D Number of Offers Received	1,280	1,206	94.2%
10N Type of Set Aside	1,276	1,253	98.2%
10R Fair Opportunity/Limited Sources	496	493	99.4%
11A COs Determination of Business Size	1,279	1,273	99.5%
11B Subcontract Plan	1,278	1,257	98.4%
12A IDV Type	91	91	100.0%
12B Award Type	1,189	1,172	98.6%
<b>Total Records Sampled</b>	<b>28,452</b>	<b>27,728</b>	<b>97.5%</b>

## Agency Procurement Data Quality Report

**Agency Name:** U.S. Department of Homeland Security (DHS)

**Fiscal Year of Reported Data:** 2024

**Agency Data:**

Total Procurement Obligations for Fiscal Year (FY) 2024: \$23,540,723,419.47

Number of Actions Entered into FPDS: 60,600

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

I certify that:

- a) Based on review of Component certifications and the Status of Actions report, **99.9** percent of reportable contract actions awarded during Fiscal Year (FY) 2024 for my agency have been entered into FPDS in accordance with applicable guidelines. During FY2024, **94.4** percent of reportable contract actions were entered into the Federal Procurement Data System (FPDS) within appropriate timeframes and in accordance with applicable guidelines;<sup>1</sup>
- b) The results reported in Exhibit II 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 of the information provided<sup>2</sup>; and
- 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.

This certification does not include actions awarded by the DHS Office of Inspector General.

#### Explanation of Data Missing from Certification:

- Due to the U.S. Coast Guard's mission, some records are delayed because of limited connectivity on deployed cutters.
- Some of the Contract Action Reports (CARs) were reported late, especially during the fourth quarter of FY2024, due to the contract writing systems' IT/security configuration changes, which caused connectivity issues between contract writing systems and FPDS. The causes of the issues were identified, and system connectivity issues were resolved.
- In addition to the completed 60,600 CARs, there are 12 draft CARs in FPDS reflecting 12 pending modifications.

<sup>1</sup> Agencies unable to certify entry of 100 percent 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*

**Part II - Assuring Data Input Accuracy**
**Controls over Data Input**

Provide the percent of the agency's FPDS CARs entered through the following means:

<b>CAR Entry Method</b>	<b>Percentage</b>
a) Contract Writing System(s) (automated)	76.08%
b) Web Portal (On-Line Login)	23.92%
c) Other (Please provide description)	0%
<b>Total</b>	<b>100%</b>

Please describe any "Other" method(s) used: No other methods were used to enter FPDS data.

**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 Memorandum 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:
  - DHS continued to use our FPDS Timeliness Report to monitor and ensure actions are reported in accordance with Federal Acquisition Regulation (FAR) established timeframes.
  - Reviewed existing data elements for verification and validation (V&V) to maintain overall data quality.
  - Contracting activities performed quarterly FPDS V&V and provided Quarterly Analysis reports.
  - Automated FPDS data checks were reviewed and updated, when needed, to complement and reinforce FPDS business rules and to identify data inconsistencies or abnormalities.
  
- b) Examples of successful practices contributing to consistently high data quality:
  - DHS continued to leverage our FPDS Timeliness Report to monitor and ensure actions are reported in accordance with FAR established timeframes. The report helped the Heads of the Contracting Activity (HCA) identify offices and/or users that may require additional attention.
  - DHS utilized our automated system, the Enterprise Reporting Application (ERA), for the random selection of the CAR sample and for collecting, reporting, and monitoring audit results. An online audit form was prepopulated with the FPDS data for each CAR in the sample and was used to validate the accuracy of each eligible data element against the contract file.

- Comprehensive FPDS training was offered for Contracting Officers and Contract Specialists to refresh their FPDS knowledge and enforce the importance of the data accuracy.
- FPDS data checks were reviewed and updated to assist in identifying data abnormalities between key reported FPDS data fields, contracting writing systems and the official contract file. Detailed daily and bi-weekly reports were generated and provided to contracting activities for verification or correction.
- DHS FPDS administrators continued to share the reports that contained Draft and Errored Out contract actions in FPDS with their Contracting Officers and Contract Specialists and provided assistance cleaning up the data.
- The FPDS V&V exercise was conducted quarterly rather than annually to facilitate early identification and resolution of systemic issues; thereby improving timeliness of corrections and improved data integrity.

Some examples of successful practices within DHS include:

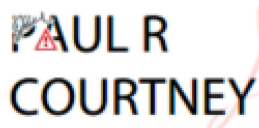
- Reinforcing the reporting requirements established by the FAR, and Homeland Security Acquisition Manual and providing training to contracting personnel to help them understand the importance of accurate and timely FPDS reporting.
- Leveraging technology in the execution of the V&V process and in the implementation of FPDS data checks.
- Using the “Status of Actions” report in SAM.gov to remedy the data discrepancies by reviewing and cleaning up Draft and Errored Out contract actions in FPDS and reiterating to contracting personnel the requirement to address the errors and complete the FPDS records at the time of the award.
- Assisting contracting activity FPDS administrators and users to use the report feature in SAM.gov to monitor and capture the data in FPDS.

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

- Frequent FPDS training that focuses on improving overall DHS data accuracy while focusing on problematic fields and integrity. Training is continually updated and refined.
- Robust change management and communications with FPDS administrators and users.
- Posting the FPDS Data Dictionary, report instructions, and other verification and validation supporting documents to help users locate key FPDS data information and generate reports to timely retrieve the needed information.
- Use of FPDS data checks to timely identify data anomalies and enhance data quality and completeness. New contract data checks are established when needed and obsolete data checks are decommissioned.
- Executing the V&V process quarterly.
- Monitoring of the Draft and Errored Out records in FPDS.
- Encouraging the use of FPDS user manuals and the Data Dictionary to understand FPDS business rules and the definition of each data element.

- Exploring opportunities to identify data discrepancies between our contract writing systems and FPDS.
- d) Barriers or challenges identified through the agency review process for which OMB or GSA could offer support or solutions:
- Notifying agencies in a timely fashion of all FPDS updates with detailed notes and give agencies sufficient time to test systems for compatibility with the planned update, as well as time to educate users on the impacts of these changes.
  - Providing additional information on potential impacts from a business process perspective resulting from changes to FPDS data element usage and validation across versions.
  - Users need help while in the application. Providing roll-over help text on the FPDS screen.
  - Ensure that new FAR requirements are implemented in FPDS and ensure the effective date of the FAR case implementation coincides with the FPDS system change.
  - GSA did not hold any change control board meetings in FY2024. These meetings are where agencies would typically receive detailed information about upcoming changes to FPDS. These meeting would also be where agencies could advocate for system changes that would improve data quality. As a result of GSA canceling these meetings there were very few updates made to FPDS resulting in known data quality problems persisting. OMB and GSA need to reestablish these meetings.

**Required Signature**

 Digitally signed by  
PAUL R COURTNEY  
Date: 2025.01.23  
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Paul R. Courtney  
Senior Procurement Executive



## **OFFICE OF INSPECTOR GENERAL**

*U.S. Department of Homeland Security*

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