Federal Trade Commission Data Quality Appendix

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This document contains detailed descriptions and information on the FTC's performance metrics, including data sources, how data is collected, how results are calculated, etc.

Most of the FTC's performance metrics are set by the FTC Strategic Plan, with results reported annually in the Annual Performance Report (APR). The APR includes additional metrics, not in the strategic plan, which are referred to as secondary metrics.

To see the FTC's Strategic Plan or other performance documents, visit https://www.ftc.gov/about-ftc/budget-strategy.

Performance Metrics

Metric 1.1.1 Amount of money returned to the public or forwarded to the U.S. Treasury as a result of consumer protection law enforcement actions.

Description: This metric tracks the FTC's effectiveness in returning money to consumers who were defrauded and forwarding money to the U.S. Treasury (e.g., if sending money to individuals is impracticable, or if funds were paid as a civil penalty). The FTC prioritizes law enforcement efforts on violations that cause the greatest amount of consumer harm. The amount of money returned to consumers or forwarded to the U.S. Treasury is a useful indicator that the FTC is targeting the right defendants.

Calculation/Formula: Sum of:

- redress payments issued to (and cashed by) consumers by the FTC;
- redress payments issued to consumers by defendants and third parties; and
- money paid to the FTC by defendants and forwarded to the U.S. Treasury, either because sending refunds was not feasible or because the money was paid as a civil penalty.

Definitions: N/A

Data Sources: Data on redress payments come from the Bureau of Consumer Protection's (BCP) collections database, the agency's financial system maintained by the Office of the Chief Financial Officer (OCFO), redress contractor reports, and Qualified Settlement Fund bank statements. The civil penalty data are summarized in a spreadsheet maintained by BCP staff in the Division of Consumer Response and Operations (DCRO).

Data Collection:

- The BCP Collection and Enforcement Database tracks all consumer protection judgments entered and all collections made on those judgments paid to the FTC. Additionally, BCP Enforcement staff maintains a spreadsheet tracking case-by-case distributions made to consumers by defendants and other third parties on a quarterly basis.
- The Office of Claims and Refunds (OCR) in DCRO reconciles monthly activity reports submitted by the redress contractors with Qualified Settlement Fund bank statements.
- OCR reconciles the monthly OCFO sub-ledger with the approved dispersals for each individual matter.
- BCP budget staff reconciles the civil penalty spreadsheet with a separately maintained spreadsheet that includes a list of all civil penalty orders in the current fiscal year. BCP budget staff also reconciles the civil penalty spreadsheet with data maintained by OCFO and with memos received by the Department of Justice, which contain copies of the checks and/or electronic fund transfers for civil penalties.

Data Limitations/Response: The amount of money is not a perfect measure of the effectiveness of the agency's work protecting consumers. If the FTC steps in and stops scams in their incipiency, there is less injury and therefore less redress provided in those situations; but consumers are undoubtedly better off. For the amount of redress distributed to consumers by defendants and third parties, information on redress checks cashed by consumers is not always available, so the amount of redress checks mailed to consumers may be used. Also, the amount of money returned/forwarded to the U.S. Treasury may depend on the amount of money the defendants have to satisfy the judgment.

Metric 1.1.2 Number of orders enjoining unfair, deceptive, or otherwise unlawful practices as a result of consumer protection law enforcement actions.

Description: This metric tracks the FTC's effectiveness in using its law enforcement authority to stop unfair, deceptive, or otherwise unlawful practices. It provides the total number of court orders the FTC obtains in its consumer protection law enforcement actions, covering the full array of conduct and monetary remedies secured.

Calculation/Formula: N/A

Definitions: N/A

Data Sources:

- LexisNexis CourtLink, the FTC website, and reports from the Bureau of Consumer Protection (BCP) Director's Office, divisions, regional offices, and Enforcement Database.

Data Collection: A spreadsheet with the completed cases for the current fiscal year is reviewed quarterly by headquarters and regional office management to ensure that all applicable cases are included. During the quarterly review, staff and management identify whether each action enjoined unfair, deceptive, or otherwise unlawful practices.

Data Limitations/Response: Data collection for this metric is done manually, which may lead to errors. BCP has processes in place to check the data to prevent this.

Metric 1.1.3 Percentage of the FTC's consumer protection law enforcement actions that targeted the subject of consumer reports in the FTC's Consumer Sentinel Network.

Description: The FTC collects consumer reports about a host of consumer issues, including fraud, identity theft, financial matters, and Do Not Call violations. Consumer reports are an integral component when determining the areas of greatest concern and injury to consumers. This metric gauges how well the FTC's consumer protection law enforcement actions target the subject of consumer reports.

Calculation/Formula: The percentage is determined by dividing the number of enforcement actions that targeted subjects of consumer reports by the total number of enforcement actions.

Definitions:

- Enforcement Action: A complaint filed in federal court to enforce federal consumer protection laws that prevent fraud, deceptive, and unfair business practices. If there are multiple defendants in the case, but only one complaint filed, we count the complaint only once.
- Consumer Reports: Complaints or other information submitted by consumers on fraud, identity theft, and other problems they experience in the marketplace. The agency collects these consumer reports directly from three principal sources:
    1. ReportFraud.ftc.gov for reporting fraud, scams, and bad business practices, or through a toll-free helpline (1-877-FTC- HELP)
    2. IdentityTheft.gov for reporting identity theft, or through an identity theft hotline (1-877-ID-THEFT)
    3. Donotcall.gov for reporting unwanted calls, or through the National Do Not Call Registry helpline (1-888-382-1222)

  In addition, the FTC receives consumer reports from other sources, including state, federal, and international law enforcement agencies, Better Business Bureaus, private entities, and mailed from consumers.
- Consumer Sentinel Network (CSN): The FTC's secure online database that provides law enforcement agencies worldwide with access to tens of millions of consumer reports about fraud, identity theft, other consumer protection topics, and the Do Not Call Registry collected during the past five years. In addition to storing consumer reports from the sources identified above, the CSN also includes consumer reports filed with state law enforcement organizations, other federal agencies, and non-governmental organizations. More information about CSN can be found at www.ftc.gov/sentinel/index.shtm.

Data Sources:

- For consumer reports: The FTC's CSN database.
- For law enforcement actions: LexisNexis CourtLink, the FTC website, and reports from the Bureau of Consumer Protection (BCP) Director's Office, divisions, and regional offices.

Data Collection: A list of all enforcement actions filed in the current fiscal year is compiled in an internal BCP spreadsheet and reviewed quarterly for completeness and accuracy by BCP staff and management. For each case, BCP staff completes CSN database searches by the matter name to determine if the action targets subjects of consumer reports to the FTC. If the defendants' names are available, staff also searches by the defendants' names. The results of the searches are also recorded on the internal BCP spreadsheet, and the percentage of actions targeting consumer reports is calculated based on this information.

Data Limitations/Response: Data collection for this metric is done manually, which may lead to errors. BCP has processes in place to check the data to prevent this.

Metric 1.1.4 Percentage of the FTC's consumer protection law enforcement actions that used the Tech Lab to identify targets, investigate or build the action.

Description: The Bureau of Consumer Protection (BCP) Tech Lab provides BCP staff innovative tools to investigate targets, detect unfair or deceptive activity, capture evidence, and conduct research. By tracking the percentage of law enforcement actions that used the Tech Lab, to identify targets, investigate, or build an action, this metric enables BCP to quantify the benefits of the Tech Lab.

Calculation/Formula: The percentage is determined by dividing the number of enforcement actions that used the Tech Lab to identify targets, investigate or build the action, by the total number of enforcement actions.

Definitions:

- Enforcement Action: A complaint filed in federal or administrative court to enforce federal consumer protection laws that prevent fraud, deceptive, and unfair business practices. If there are multiple defendants in the case, but only one complaint filed, we count the complaint only once.

Data Sources:

- For law enforcement actions: LexisNexis CourtLink, the FTC website, and reports from the BCP Director's Office, divisions, and regional offices.

Data Collection: A list of all enforcement actions filed in the current fiscal year is compiled in an internal BCP spreadsheet and reviewed quarterly for completeness and accuracy by BCP staff and management. During the quarterly review, staff and management reports whether the action used the Tech Lab to identify targets, investigate, or build the action. BCP tracks within the internal spreadsheet whether the action used the Tech Lab to identify targets, investigate, or build the action.

Data Limitations/Response: Data collection for this metric is done manually, which may lead to errors. BCP has processes in place to check the data to prevent this.

Metric 1.1.5: Number of consumer protection law enforcement cases for which BE economists prepared to testify as expert witnesses.

Description: This metric tracks how often the agency uses staff, instead of outside contractors, to serve as expert witnesses in FTC consumer protection law enforcement actions. This helps to show Bureau of Economics (BE) expertise developed through economic research related to consumer protection analysis and represents not only the expertise of the testifying expert, but also the expertise of other BE staff that are supporting that expert.

Calculation/Formula: This metric is a count of the number of cases during the fiscal year for which a BE economist prepared to be a testifying expert for a consumer protection law enforcement action. The term “BE economist” can refer to BE staff members that are not economists, such as financial analysts.

Definitions: N/A

Data Sources: BE’s Weekly Report to the Commission. This report lists the number of consumer protection cases for which a BE staff member is preparing to be a testifying expert witness.

Data Collection: The data will be collected weekly by the BE Performance Measure Reporting Official from the BE Weekly Report to the Commission.

Data Limitations/Response: N/A

Secondary Metric 1.1.6: Number of reports collected and entered into the Consumer Sentinel Network database.

Description: The agency uses the Consumer Sentinel Network (CSN) as a repository for millions of consumer reports from a variety of sources, including direct consumer reports to the FTC and reports received by the FTC's partners. CSN provides law enforcement members with access to millions of consumer reports, which are used to identify trends as well as targets to investigate.

Calculation/Formula: N/A

Definitions:

- Consumer Sentinel Network (CSN): The FTC's secure online database that provides law enforcement agencies worldwide with access to millions of consumer fraud, identity theft, financial, and Do Not Call Registry reports largely collected during the past five years. In addition to storing consumer reports from the sources identified above, the CSN also includes reports filed with state law enforcement organizations, other federal agencies, and non-governmental organizations. More information about CSN can be found at www.ftc.gov/sentinel/index.shtm.

Data Sources: The FTC's CSN database.

Data Collection: BCP staff continuously monitors the number of reports that are entered into the CSN database for accuracy and volume.

Data Limitations/Response: The data in the CSN database are dependent on people providing accurate and complete information. CSN data reflects only a fraction of total consumer fraud violations.

Secondary Metric 1.1.7: Percentage of redress cases in which money designated for distribution is issued to consumers within six months.

Description: This secondary metric ensures that the FTC returns redress dollars to injured consumers as quickly as possible. Money is considered "designated for distribution" when the FTC is in receipt of all funds, legal issues are resolved, and a usable claimant list is ready. If there is a claims process in which consumers must apply for a refund, then dollars are "designated for distribution" after all claims have been reviewed and verified.

Calculation/Formula: When a redress distribution to consumers occurs, the date designated for distribution in the redress case status report is checked to determine whether or not redress to consumers occurred within six months. The percentage is determined by dividing the number of cases of redress distribution that occurred within six months by the total number of redress distributions in a quarter.

Definitions: N/A

Data Sources: BCP's Open Redress Case Status Reports, which are generated from the Redress Enforcement Database. The redress team uses this database to assign new cases to the redress vendors. The team also uses this system to track milestones, pay invoices, issue work assignments, and track the financial data for each individual case.

Data Collection: When a redress distribution occurs, the team compares the date the case was assigned to a vendor with the date of the distribution to determine whether redress occurred within six months. The database automatically records important case milestones, for example, when a new case is assigned to a vendor.

Data Limitations/Response: There are no significant data limitations.

Metric 1.2.1 Number of outreach events.

Description: The FTC conducts outreach and events to provide practical knowledge, guidance, and tools, and to learn about key challenges and opportunities for future FTC engagement.

Calculation/Formula: N/A

Definitions:

- Outreach Event: Includes presentations, conferences, webinars, panels, exhibits, media interviews, meetings with external groups, email outreach, partner promotion of FTC content, and other events to provide practical knowledge, guidance, and tools to consumers and businesses.

Data Sources: Staff reports quarterly on outreach events in which they participate by speaking, presenting, exhibiting, or providing a media interview.

Data Collection: The outreach events for the current fiscal year are added to an internal BCP spreadsheet, and the divisions and regions also provide quarterly input to ensure that all BCP outreach events are included.

Data Limitations/Response: Data collection for this metric is done manually, which may lead to errors. BCP has processes in place to check the data to prevent this.

Metric 1.2.2 Number of page views for consumer and business education digital articles and other online resources.

Description: This metric tracks the reach of the agency's education messages for consumers and businesses via the web. The metric counts the number of page views of FTC consumer education articles, blog posts, and other materials on FTC websites, as well as the page views of FTC business education plain-language guidance articles, blog posts, and other materials.

Calculation/Formula: N/A

Definitions: N/A

Data Sources: Page view data from the federal government's Digital Analytics Program.

Data Collection: FTC staff are trained by the federal Digital Analytics Program to generate reports of page views for designated websites and pages to determine the number of page views of consumer education pages and business education pages.

Data Limitations/Response:

- The data could be limited if there is downtime in the FTC's network or online systems.
- In addition, the number of page views of business education pages does not include legal resources posted in other sections of the FTC website, including Commission reports, rules, statutes, court filings and other documents with significant business education value.
- Search engines like Google and Bing have started integrating AI overviews in their results pages, which has caused a decrease in search clicks across sectors. Some experts estimate anywhere from a 35% to 60% decrease in search clicks. We're seeing this play out on our consumer and business pages, which are getting less search traffic. As a result, pageviews are also decreasing.

Secondary Metric 1.2.3: Number of consumer protection reports the FTC released.

Description: FTC staff prepare reports regarding current important topics in consumer protection, and these reports are the basis for this metric. Consumer protection reports provide information to policy makers, both internally and externally, to help them understand important contemporary issues. This metric also ensures that the FTC releases a variety of informative reports to the public that help promote the understanding and awareness of consumer protection issues.

Calculation/Formula: N/A

Definitions: N/A

Data Sources: The FTC releases a variety of consumer protection reports that contain analysis of data or workshops held by the FTC, data books such as the Consumer Sentinel Network Data Book and the Do Not Call Registry books, reports to other federal agencies, and information-only reports such as the FTC Cigarette Report and the FTC Smokeless Tobacco Report. All reports are available on the FTC's website, https://www.ftc.gov/policy/reports.

Data Collection: At the end of each quarter, the website is checked to determine the number of consumer protection reports published. This information is also verified and validated against BCP's internal spreadsheet.

Data Limitations/Response: Reports are issued in discrete units and require substantial effort often over multiple years. Therefore, while their yearly production can vary substantially, the effort devoted to reports is more constant. The number of reports depends in part on the availability of staff time to conduct the analysis and write the report. The law enforcement workload affects the time available for producing reports.

Metric 1.3.1: Number of consumer protection investigations or cases in which the FTC and other U.S. federal, state, and local government agencies shared evidence or information that contributed to FTC law enforcement actions or enhanced consumer protection.

Description: This metric tracks the amount of information sharing by the FTC and other domestic law enforcement agencies to further the goal of protecting consumers from fraud. The geographic location and other demographics may affect the types of fraud that consumers encounter, making it important for government agencies to share information and resources to enhance consumer protection.

Calculation/Formula:

- Sum of:
  - Number of memos authorizing the sharing of information with other U.S. federal, state, and local government agencies from the FTC's Office of the General Counsel (OGC).
  - Number of other U.S. federal, state, and local law enforcement actions resulting from coordinated law enforcement sweeps led by the FTC.
  - Number of U.S. federal, state, and local government agencies BCP staff received information from for a closed investigation or completed case.

Definitions: N/A

Data Sources:

- Sharing of information with other agencies:
  - OGC authorizes the sharing of information in the possession of the FTC with other U.S. federal, state, and local government agencies. Memos approving this sharing are maintained by OGC, and OGC provides a copy of their tracking sheet to BCP staff.
  - There is a press release issued for each FTC-led law enforcement sweep that includes the number of law enforcement actions resulting from the sweep. If the information is not available in the press release, BCP will obtain the information from the sweep coordinator.
- Sharing of information with the FTC: Email surveys after the completion of an investigation or case.

Data Collection:

- Sharing of information with other agencies:
  - BCP staff track the emails sent to OGC and OGC's tracking sheet. BCP staff check these completed requests with requests sent to OGC and BCP's Chief of the Criminal Liaison Unit (CLU).
  - BCP staff track the number of law enforcement actions resulting from FTC-led law enforcement sweeps.
- Sharing of information with the FTC: BCP staff are surveyed after the completion of an investigation or case to determine whether the FTC received information from other U.S. federal, state, and local government agencies. Staff report the names of the U.S. federal, state, and local governments from which they received information or evidence regarding a closed investigation via email.

The results are maintained in a spreadsheet by BCP staff. A list of all the cases completed in the current fiscal year is compiled in a separate spreadsheet. This information is reviewed periodically by staff and management for completeness and accuracy. On at least a quarterly basis, BCP staff provide a spreadsheet listing closed investigations and indicating whether each investigation resulted in a filed law enforcement action. The OGC provides a copy of their tracking sheet that includes sharing of information to U.S. federal, state and local government agencies to BCP staff. BCP staff checks the spreadsheet to ensure that all requests for sharing of information are included.

Data Limitations/Response: Even with the internal review process, it is possible that an investigation or case will be inadvertently left out of the report.

Metric 1.3.2: Number of consumer protection investigations or cases in which the FTC obtained foreign-based evidence or information or engaged in other mutual assistance that contributed to FTC law enforcement actions, or in which the FTC cooperated with foreign agencies and/or multilateral organizations on enforcement matters.

Description: The FTC's Office of International Affairs (OIA) works to expand cooperation and coordination between the FTC and international law enforcement and consumer protection partners through information sharing, investigative assistance, and the development of investigative best practices and enforcement capacity. This metric tracks the amount of international consumer protection cooperation and information sharing.

Calculation/Formula:

- Sum of:
  - # of FTC consumer protection investigations or cases where supporting evidence or information or other investigative assistance was obtained from foreign agencies.
  - # of foreign consumer protection investigations or cases where supporting evidence or information or other investigative assistance was provided by the FTC.
  - # of enforcement matters where the FTC otherwise engaged in enforcement cooperation with foreign agencies or multilateral enforcement networks.

Definitions:

- Mutual assistance: Sharing information, including complaints or personally identifiable information; investigative assistance including obtaining evidence under appropriate legal authorities; coordinating enforcement actions and priorities; developing enforcement capacity and investigative best practices; or other appropriate assistance that aids in the enforcement of laws and rules.
- Multilateral organizations: Formal international organizations and agency-based peer networks that are pursuing enforcement–related cooperation projects and activities.

Data Sources: OIA weekly reports and internal tracking sheets.

Data Collection: OIA consumer protection team members report matters they worked on in which information was shared, assistance was obtained, or other enforcement cooperation activities were pursued, on a log maintained on an OIA shared drive. Managers review these matters to ensure that they qualify as part of the metric and have not been previously counted.

Data Limitations/Response: OIA captures relevant data at several different points including OIA weekly reports and internal tracking sheets. Data are input by several different staff members. Managers review the entries contributing to this metric to ensure all appropriate cases and investigations are identified and to avoid double counting of particular matters.

Metric 2.1.1: Total consumer savings and other measurable benefits generated by antitrust enforcement.

Description: Anticompetitive mergers and conduct can lead to higher prices and other negative effects for market participants. This metric tracks the estimated amount of money that the Commission saved consumers, workers, and others from all of the agency's antitrust cases that concluded during the fiscal year.

Calculation/Formula: The sum of the benefits from each antitrust case concluded during the fiscal year. To determine the benefits generated by an individual case, staff use case-specific data when available. If case-specific data is not available, due to the case ending prior to a full economic analysis being done, staff use one of the following formulas to estimate the benefit:

- In merger cases, benefit is estimated at three percent of the volume of commerce in the relevant geographic/product market(s) for two years.
- In conduct cases, benefit is estimated at one percent of the volume of commerce in conduct matters.

Definitions:

- Concluded: merger cases are considered concluded when the merging parties have abandoned the merger, a settlement has been reached, or if litigated, when all appeals have concluded. Conduct cases are considered concluded when a settlement has been reached, or if litigated, when all appeals have concluded.
- Consumer Savings and other measurable benefits: The estimated amount of money saved by U.S. consumers, workers, or others impacted by anticompetitive mergers and business conduct as a result of FTC enforcement actions.
- Volume of Commerce: The size (in dollars) of the relevant geographic/product market(s) in which the FTC is attempting to maintain competition in a given case.
- Relevant Geographic/Product Market: The marketplace for the purchase and sale of a particular good, service or combination thereof, which is the focus of an FTC investigation.

Data Sources: The lead attorney estimates consumer savings and other measurable benefits for a particular case using either case-specific data or the applicable estimation formula developed by the Bureau of Economics. Staff economists review all attorney estimates for concurrence before they are used in reporting.

Data Collection: The data are entered into the BC Enforcement Database by performance staff and reviewed quarterly by analysts, attorneys, economists, and senior management.

Data Limitations/Response: The data are dependent on the estimates of consumer savings made by staff attorneys in accordance with the above procedures. In order to ensure accurate estimates, all staff attorney estimates are shared with staff economists for concurrence before being used in reporting.

Metric 2.1.2: Number of antitrust law enforcement cases for which BE economists prepared to testify as expert witnesses.

Description: This metric tracks how often the agency uses staff, instead of outside contractors, to serve as expert witnesses in FTC antitrust law enforcement actions. This helps to show Bureau of Economics (BE) expertise developed through economic research related to competition analysis and represents not only the expertise of the testifying expert, but also the expertise of other BE staff that are supporting that expert.

Calculation/Formula: This metric is a count of the number of cases during the fiscal year for which a BE economist prepared to be a testifying expert for an antitrust law enforcement action. The term “BE economist” can refer to BE staff members that are not economists, such as financial analysts.

Definitions: N/A

Data Sources: BE’s Weekly Report to the Commission. This report lists the number of antitrust cases for which a BE staff member is preparing to be a testifying expert witness.

Data Collection: The data will be collected weekly by the BE Performance Measure Reporting Official from the BE Weekly Report to the Commission.

Data Limitations/Response: N/A

Secondary Metric 2.1.3: Total sales in the affected markets in which the Commission took merger and nonmerger enforcement actions.

Description: The Commission's merger actions are guided in part by the size of the relevant product and geographic markets involved. It is important that the FTC use its resources in areas where it can achieve the most positive change. This metric estimates the total size of all markets subject to an antitrust enforcement action during the fiscal year.

Calculation/Formula: The sum of the estimated volume of commerce in the relevant geographic/product market(s) from each antitrust case concluded during the fiscal year.

Definitions:

- Concluded: merger cases are considered concluded when the merging parties have abandoned the merger, a settlement has been reached, or if litigated, when all appeals have concluded. Conduct cases are considered concluded when a settlement has been reached, or if litigated, when all appeals have concluded.
- Volume of Commerce: The size (in dollars) of the relevant geographic/product market(s) in which the FTC is attempting to maintain competition in a given case.
- Relevant Geographic/Product Market: The marketplace for the purchase and sale of a particular good, service or combination thereof, which is the focus of an FTC investigation.

Data Sources: The lead attorney determines the volume of commerce for a particular case using available information, either public information or private information obtained by the FTC during its investigation. Staff economists review all attorney estimates for concurrence before they are used in reporting.

Data Collection: The data are entered into the BC Enforcement Database by performance staff and reviewed quarterly by analysts, attorneys, economists, and senior management.

Data Limitations/Response: The data are dependent on the estimates of volume of commerce provided by staff. In order to ensure accurate estimates, all staff attorney estimates are shared with staff economists for concurrence before being used in reporting.

Metric 2.2.1: Number of reports, studies, economic papers, and other public analysis of competition related topics that are released by the FTC.

Description: Research and industry studies have been an important part of the FTC's mission since its founding. This metric tracks the amount of competition-related research and analysis that the agency is releasing. Included in this count are Commission staff reports, policy statements, annual competition reports, Bureau of Economics (BE) working papers, and BE economic reports. Advocacy comments and amicus briefs are not counted here, but are counted in Metric 2.2.2.

Calculation/Formula: The number of reports, studies, and policy statements issued by the FTC during a given fiscal year.

Definitions: N/A

Data Sources: Information on studies and reports on significant competition-related issues is taken from ftc.gov, primarily from these locations:

- https://www.ftc.gov/policy/reports/commission-staff-reports
- https://www.ftc.gov/legal-library/browse/policy-statements
- https://www.ftc.gov/policy/reports/annual-competition-reports
- https://www.ftc.gov/policy/reports/policy-reports/economics-research/working-papers
- https://www.ftc.gov/policy/reports/policy-reports/economics-research/economics-ftc

Data Collection: At the end of each quarter, OCFO staff check the websites (noted above) and record all newly released competition documents. Data are also verified and validated with BE, the Bureau of Competition, and the Office of Policy Planning.

Data Limitations/Response: A counting metric, such as this, does not account for the differences in staff time needed to produce each report, or on the overall quality or usefulness of the end products.

Metric 2.2.2: Number of advocacy comments and amicus briefs filed regarding competition related topics.

Description: Although the FTC is primarily a law enforcement agency, advocacy work is a cost-effective way to further the FTC's competition mission and allows the FTC to address situations where competition may be affected by the actions of public entities, including regulators, legislators, and the courts. The metric tracks the output of competition advocacy comments and amicus briefs filed by the agency during the fiscal year.

Calculation/Formula:

- Sum of:
  - Advocacy comments submitted
  - Amicus briefs submitted

Definitions:

- Advocacy Comments: Formal letters or comments with policy recommendations sent to federal agencies, state legislators, state agencies, and boards. Short letters that do not contain policy recommendations and other forms of advocacy, such as phone calls and meetings with decision makers, are not counted. International advocacy comments also are not counted here.
- Amicus Briefs: Court filings providing the FTC's recommendations in cases where the FTC is not a party. Only briefs signed by the Commission are included. Instances where significant informal input is provided to the Office of Solicitor General, which then files its own brief, are not counted.

Data Sources:

- List of advocacy comments: www.ftc.gov/policy/advocacy/advocacy-filings
- List of amicus briefs: www.ftc.gov/policy/advocacy/amicus-briefs

Data Collection: Staff in the Office of Policy Planning (OPP) tracks every advocacy comment and amicus brief filed during the fiscal year by checking the FTC website. Staff checks with OPP management to verify advocacy list, and OGC management to verify amici list.

Data Limitations/Response:

Metric 2.3.1: While each agency conducts an independent review consistent with the law and facts in its jurisdiction, the percentage of FTC antitrust cases involving engagement with a foreign antitrust authority in which the agencies reached compatible outcomes.

Description: While foreign competition agencies independently conduct investigations based on the laws and facts in their jurisdictions, The Office of International Affairs (OIA) seeks to ensure appropriate cooperation on investigations under parallel review by the FTC and foreign competition agencies. This metric gauges the effectiveness of the FTC's enforcement cooperation with foreign antitrust authorities pursuing parallel enforcement activities.

Calculation/Formula:

    - # of FTC cases, with at least one substantive contact with a foreign antitrust agency, where the foreign agency is pursuing a case against the same company(ies) and where the agencies followed consistent analytical approaches and reached compatible outcomes
- divided by the
    - # of FTC cases where the FTC had at least one substantive contact with a foreign antitrust agency, where the foreign agency is pursuing a case against the same company(ies).

Definitions:

- Followed consistent analytical approaches: The core analytical approaches relied on by each of the cooperating reviewing agencies are based on accepted principles of competition law, economics, and policy.
- Reached compatible outcomes: the reviewing agencies' resolutions do not raise significant direct conflicts that impede each agency's desired outcome.

Data Sources: OIA weekly reports and internal tracking sheets.

Data Collection: OIA antitrust team members monitor and report on FTC matters in which substantive contact took place. Staff reviews and compiles the matters reported on a log maintained on an OIA shared drive. Managers review and ensure that the matters reported qualify for the metric and have not been previously counted. OIA senior management makes a final decision on compatibility for FTC measurement purposes based on their professional judgment.

Data Limitations/Response: Investigations may involve multiple agencies and may span more than one fiscal year, such that cooperation with different agencies on the same transaction may be accounted for in separate fiscal years. Data is captured at several different points within OIA, including weekly reports and internal tracking sheets. Data is input by several different staff members. Management review is necessary to ensure both that the matters reported included substantive contact with a foreign antitrust authority and that the consistency of approaches and compatibility of outcomes are properly assessed.

Metric 3.1.1: The FTC's total benefit to Americans compared to the FTC's net cost.

Description: The FTC strives to provide the maximum value to American taxpayers through its enforcement efforts. This metric is an attempt to capture the quantifiable benefits of FTC enforcement, including redress dollars returned to consumers, civil penalties paid by defendants, estimates of harm prevented from stopping fraud and deception, and estimates of consumer savings generated by our antitrust work. The metric then compares this value to the FTC's net cost to American taxpayers. This metric does not, however, capture the full value of the FTC's work, as many aspects are difficult to quantify. For example, the value of deterrence, of competition advocacy, and of consumer and business education are not counted in this metric.

Calculation/Formula: Value created by FTC law enforcement, divided by, agency net cost.

Value created by FTC law enforcement is the sum of these items:

- Redress dollars sent to victims of fraud and deception
- Civil penalties paid by companies and sent to the U.S. Treasury
- Funds, which the agency was not able to return to consumers as redress, and were sent to the U.S. Treasury
- Estimate of harm prevented by stopping fraud and deception through our consumer protection cases
    - For each consumer protection case, an estimate of harm prevented is established based on the assumption that the unlawful conduct would have continued for one year but for our action and the amount of harm that would have occurred in that year is the same as what consumers lost in the prior year. BCP case managers provide the estimate, by examining the amount of consumer loss due to fraudulent, deceptive, or unfair practices in the 12 months prior to the FTC's first contact with the defendants.
- Estimate of consumer savings generated by merger and nonmerger antitrust cases
    - For each antitrust case, an estimate of consumer savings is established based on case-specific economic analysis, when available. If case-specific data is not available, due to the case ending prior to a full economic analysis being done, staff use one of the following formulas to estimate the benefit. In merger cases, the benefit is estimated at three percent of the volume of commerce in the relevant geographic/product market(s) for two years. In conduct cases, the benefit is estimated at one percent of the volume of commerce.

Agency Net Cost is calculated by taking the total agency expenditures and obligations during the fiscal year, and subtracting the amount of offsetting collections (mostly HSR filing fees paid by companies seeking to merge) to establish the amount of agency spending that is paid for by the American taxpayer.

Definitions:

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Data Sources:

- Redress/Civil Penalties/Disgorgement:
    - Bureau of Consumer Protection's (BCP) Collection and Enforcement Database
    - the agency's financial system
    - redress contractor reports, and
    - Qualified Settlement Fund bank statements.
- Estimate of harm prevented/Estimate of consumer savings:
    - Case attorneys provide estimate based on case specific data

Data Collection:

- Redress/Civil Penalties/Disgorgement:
    - The BCP Collection and Enforcement Database tracks all consumer protection judgments entered and all collections made on those judgments paid to the FTC. Additionally, BCP Enforcement staff maintains a

spreadsheet tracking case-by-case distributions made to consumers by defendants and other third parties on a quarterly basis.
    - The Office of Claims and Refunds (OCR) in DCRO reconciles monthly activity reports submitted by the redress contractors with Qualified Settlement Fund bank statements.
    - OCR reconciles the monthly OCFO sub-ledger with the approved dispersals for each individual matter.
    - BCP budget staff reconciles the civil penalty spreadsheet with a separately maintained spreadsheet that includes a list of all civil penalty orders in the current fiscal year. BCP budget staff also reconciles the civil penalty spreadsheet with FTC financial data and with memos received by the Department of Justice, which contain copies of the checks and/or electronic fund transfers for civil penalties.
- Estimate of harm prevented: Staff uses company sales and other records, as well as information from company employees and customers, where applicable. After the completion of a case, staff is surveyed via email for the estimated dollar value of consumer loss.
- Estimate of consumer savings: The lead attorney on each antitrust case provides the estimate of consumer savings and other measurable benefits for a particular case using either case-specific data or the applicable estimation formula (see Metric 2.1.1). Results are reviewed by staff economists before being entered into the BC Enforcement Database by performance staff. Data is submitted to the reviewed and submitted to the agency performance team quarterly.

Data Limitations/Response:

- While titled "The FTC's total benefit," some aspects of the FTC's work are not captured, including research, advocacy, education, and deterrence.
- Estimates of consumer harm are based on the sum of harm caused in the year prior to the FTC's case. The FTC considers this a conservative way to estimate the amount of harm prevented. For many cases this estimate is likely to be low.
- Estimates of consumer savings from antitrust cases are based on an economic analysis of the specific facts of the case, when available, most cases conclude early and so estimates are based on a percentage of market size. This will lead to some cases having estimates being higher than actual amounts, and others being lower than actual amounts.

Metric 3.1.2: Audit opinion from the agency's independent financial statement auditors.

Description: FTC management is responsible for the preparation and fair presentation of annual financial statements in accordance with U.S. generally accepted accounting principles. As required by law, the FTC's financial statements are audited annually by independent auditors. The auditors will determine whether the annual financial statements and related notes present fairly, in all material respects, the assets, liabilities, and net position in accordance with U.S. generally accepted accounting principles. The ideal outcome is an unmodified opinion. Potential negative outcomes include a qualified or adverse opinion or a disclaimer from opinion.

Calculation/Formula: N/A

Definitions:

- Annual Financial Statements: The financial statements of a reporting entity as described in Section 3515 of Title 31 of the United States Code and OMB Circular No. A-136.
- Audit Opinions: The audit report will contain an opinion on the financial statements. Potential opinions include:
  - Unmodified opinion: the annual financial statements are fairly presented and conform to GAAP. Also referred to as an unqualified opinion.
  - Qualified opinion: the annual financial statements are fairly presented and conform to GAAP in most areas, but not all.
  - Adverse opinion: the annual financial statements are not fairly presented and do not conform to GAAP.
  - Disclaimer from opinion: the auditor has chosen not to present an opinion. This may happen if the auditors could not get access to all of the financial data.
- Generally Accepted Accounting Principles (GAAP): Standards of accounting set by the Financial Accounting Standards Board (FASB). For government agencies, relevant standards are identified in *Statement of Federal Financial Accounting Standards (SFFAS) 34: The Hierarchy of Generally Accepted Accounting Principles.*

Data Sources: Independent auditor's report on annual financial statements.

Data Collection: FTC's independent auditors render their opinion to the agency via an audit report produced each November. The report is sent to the FTC Inspector General, and a copy is published in the Agency Financial Report. Staff from the Office of the Chief Financial Officer report the relevant opinion from the audit report in the performance reporting system.

Data Limitations/Response: The burden of data collection for this metric is on the independent auditor, who must assess whether they have access to sufficient data to render an opinion. As our metric reports only on the result of the audit opinion, there are few data limitations, and if the auditor should not be able to render an opinion, we classify that as a missed target. It should be noted, however, that even an unmodified audit opinion is not a guarantee that financial statements are 100% accurate. The audit is also not a review of the agency's overall financial health, budget decisions, or effective use of funds.

Metric 3.1.3: Percentage of new contracts awarded within FTC's established procurement action lead time.

Description: The agency's acquisitions division engages in the time-intensive process of awarding government contracts. To measure the efficiency of this work, this agency tracks the percentage of new contract actions awarded within established lead times. The lead time varies depending on the type of contract. Timely awarding of contracts is important to keep mission work moving forward.

Calculation/Formula: For all new contract actions awarded during the time frame, the percentage that were completed in equal or fewer days than the lead time for that type of contract action. Days taken to complete an action are calculated based on the PALT start date and the award date. The PALT varies for different types of contract actions:

Transaction Type	Lead Time
Expert Witness Contracts	15 days
New BPA Calls	38 days
New Contracts for Supplies on a GWAC	45 days
New Sole Source Contracts	60 days
New Contracts for Services on a GWAC	180 days
New Competed Contract on the Open Market	365 days

Only new awards are included in the calculation, not contract modifications.

Definitions:

- Award Date: PRISM data field for each contract that reflects the date the contract or BPA call is awarded. Contracts are considered awarded when CO has signed the PDF award document.
- PALT Start Date: PRISM data field for each contract that reflects the date that acquisitions has a complete procurement package from the customer, or in the case of an open market contract, the date of publication of a solicitation by a contracting officer, such as a request for quotations (RFQ), request for proposals (RFP), or an invitation for bids (IFB).
- Procurement Action Lead Time (PALT): The amount of time needed for the Acquisitions Division to award a contract, order, or modification after receipt of an approved requisition and all necessary supporting documents.

Data Sources:

- Procurement Information System for Management (PRISM): the acquisitions system for requisition and contract writing. PRISM is used for all contracting actions and supports the entire procurement lifecycle, generating and maintaining procurement documentation.
- Oracle Business Intelligence (OBI): web accessible reporting tool for data analytics capability for data processed in Oracle, the FTC's financial system. Various metrics, including PALT, are tabulated and reported on OBI's dashboards.

Data Collection: OBI automatically pulls contract data from PRISM, and calculates the number of contracts within PALT. The relevant dates in PRISM are manually set by acquisitions contract specialists when preparing the contract award.

Data Limitations/Response:

- Dates are manually input.
- Some delays may be caused by the program office and are not the fault of the acquisitions division.
- The PALT percentage does not show how late contracts are that aren't awarded within PALT.

Metric 3.1.4: Percentage of contract dollars awarded through a competitive process.

Description: The FTC strives to use full and open competition in awarding government contracts, whenever possible, to most efficiently use its resources. The FTC typically awards over $100 million in contracts each year to private companies for supplies and services needed to complete its work. Competitive procurement can drive value, performance, and accountability. This metric tracks the percentage of FTC contract dollars that are awarded through a competitive process.

Calculation/Formula: Total dollar value of obligations during the fiscal year for contracts awarded through a competitive process, divided by the total value of obligations of eligible dollars during the fiscal year.

Definitions:

- Obligations: When a contract is awarded (or modified), the amount of money set aside for the purpose of paying the cost of the contract. Obligations can also be negative, as unspent funds (obligations) are de-obligated from contracts that have ended.
- Competitive Process: When seeking to award a contract for goods or services, a competitive process sees the government collect proposals from multiple vendors (as opposed to a single vendor) and then evaluate the best option among the proposals.

Data Sources:

- SAM.gov: https://sam.gov/. The System for Award Management (SAM.gov) is an official government website where vendors register to do business with the U.S. government.

Data Collection: Data for this metric is downloaded from SAM.gov. Under Static Reports, https://sam.gov/reports/awards/static, Competition Reports are available in PDF form for previous fiscal years. Current fiscal year data for the Competition Report can be found under Standard Reports, https://sam.gov/reports/awards/standard. These reports provide the Competition Percentage, which is reported as our metric result.

Data Limitations/Response:

- FPDS data may have errors.

Metric 3.1.5: Percentage of internal customers satisfied with service from OCFO, OCIO, HCMO, and OCASO.

Description: The FTC's various mission support offices provide the agency's investigators, attorneys, and economists with the resources they need to do the law enforcement, research, education, and advocacy necessary to fulfil the FTC's mission. This metric tracks customer satisfaction from agency staff with the four largest mission support offices:

- Human Capital Management Office (HCMO)
- Office of the Chief Administrative Services Officer (OCASO)
- Office of the Chief Financial Officer (OCFO)
- Office of the Chief Information Officer (OCIO)

Calculation/Formula: The metric reports a combined satisfaction score, by taking the average of the satisfaction scores of the four offices.

Each individual office's satisfaction score is calculated by taking the number of survey respondents who answered that they were satisfied or very satisfied with the customer service provided by that office, divided by the total number of survey respondents who answered the question.

Definitions: N/A

Data Sources:

- FTC Customer Satisfaction Survey

Data Collection: OCFO administers the FTC Customer Satisfaction Survey annually to agency staff. The survey is open to all staff for a set period of time in July or August. Results from the survey are consolidated and used to determine the satisfaction rates for this metric.

Data Limitations/Response:

- Survey is not mandatory, and results may be skewed based on the sample of staff who take the survey.

Metric 3.2.1: Percentage of employees who created an individual development plan in eTrain2.

Description: Training is an important part of strengthening the federal workforce and ensuring employees are equipped to meet the FTC's mission. Individual Development Plans (IDPs) complement training by offering a structured framework to align employee development with both personal career goals and organizational priorities. Training provides the tools and knowledge employees need, while IDPs give direction and purpose to growth efforts. By integrating the two, the FTC ensures employees are prepared for current responsibilities and future challenges, reinforcing the agency's ability to remain effective, innovative, and mission focused. This metric tracks the percentage of employees who create an IDP each year.

Calculation/Formula: The number of employees who created an IDP divided by the total number of employees.

Definitions:

- Individual Development Plan (IDP): An IDP is a personal roadmap that helps employees set career goals and identify training or experiences to reach them, created together with their supervisor to support both personal growth and the agency's mission.
- eTrain2: The FTC's online training management system. Electronic IDPs can be created and approved within the system.

Data Sources:

- eTrain2

Data Collection: Training staff from the Human Capital Management Office uses the reporting features from eTrain2 to download the relevant data.

Data Limitations/Response:

- Some offices may still use paper or PDF IDPs, which will not be counted by this metric. The training team will encourage staff to use electronic IDPs.
- Data may not be accurate if the employee does not ensure that their supervisor's name is up to date in the system. This will cause the routing for the IDP approval to go to an erroneous person, as such, plan approval and completion approval will not be accurate.

Metric 3.2.2: Percentage of supervisors who completed at least one leadership development activity and recorded it in eTrain2.

Description: Effective leaders ensure that resources are managed wisely, policies are implemented fairly, and employees are motivated to deliver high-quality public service. By investing in leadership development, agencies build a pipeline of capable leaders who can navigate complex challenges, drive innovation, and maintain continuity during times of change. They provide leaders with the skills to manage performance, resolve conflicts, and develop their teams, skills that are increasingly critical in today's evolving federal workplace. Leadership development programs also support succession planning by ensuring FTC is ready for retirements, workforce shifts, and emerging mission priorities. Ultimately, leadership development is not just about individual growth; it strengthens the entire organization. This metric tracks the percentage of supervisors who complete leadership training.

Calculation/Formula: Number of supervisors and managers who participated in leadership development activities during the fiscal year divided by the total number of employees.

Definitions:

- Leadership development activities: A leadership activity is any structured task, exercise, or experience designed to develop or demonstrate leadership skills such as decision-making, communication, problem-solving, teamwork, or strategic thinking. Leadership activities may include formal training sessions, simulations, team projects, mentoring, workshops, eTrain2 classes, or real-world assignments that place individuals in roles requiring them to guide, influence, or support others toward achieving a common goal.
- eTrain2: The FTC's online training management system. Leadership development training is available in eTrain2, and external training can be tracked in eTrain2 using electronic SF-182 forms.

Data Sources:

- eTrain2

Data Collection: Training staff from the Human Capital Management Office uses the reporting features from eTrain2 to download the relevant data.

Data Limitations/Response:

- If leadership development training is not taken through eTrain2 and not tracked in eTrain2 through an SF-182 form, some training may not be counted.
- Training may be undercounted if the employee does not properly record training in eTrain2. For example, if an employee completes a class at a local university and does not submit an SF-182 in eTrain2 the training will not be counted in this metric.

Metric 3.3.1: Availability of information technology systems.

Description: Information technology systems must be available and accessible to support the FTC mission. Lack of availability and accessibility severely constrains employees' and managers' ability to serve the public and stakeholders. This metric tracks service outages and monitors the uptime of critical information technology (IT) and end user services, as well as the agency's infrastructure backbone, including:

- Email
- FTC-specific applications and systems
- Wireless services
- Internet
- Intranet
- Phone and Voicemail
- Wide Area Network
- Litigation support applications and systems
- Economic support systems
- Remote access

Calculation/Formula: Service Availability = Minutes in the reporting period – Minutes of unplanned outages / Minutes in the reporting period for IT and end user services under FTC responsibility. The availability of each service is calculated separately, and a weight is applied to each service based on an approximate number of users impacted by an outage. The separate availability numbers are combined into the reported availability figure.

Definitions:

- Outage: Refers to a period of time that an IT service or system fails to provide or perform its primary function.

Data Sources: There are several primary data sources for this metric: (1) the FTC Enterprise Service Desk records system; (2) user service and infrastructure monitoring tools; and (3) FTC's IT Change Management records system.

Data Collection: Unplanned outage data are collected by through a spreadsheet maintained by OCIO staff. OCIO performance staff obtain all of the outage data and verify outage timeframes by correlating outages to system alerts and infrastructure monitoring tools.

Data Limitations/Response: The agency uses a manual tracking process to record the outage data and is primarily reliant on staff reporting outages. The agency continues to increase the usage of automated infrastructure and application monitoring tools and configure these tools to provide useful and proactive reporting and alerts.

Metric 3.3.2: Annual score on the FTC cybersecurity scorecard.

Description: This metric monitors the agency's progress in achieving multiple critical cybersecurity metrics, each of which measures the agency's cybersecurity posture and strength in protecting the confidentiality, integrity, and availability of information systems. The cybersecurity metrics that go into this Index are:

- % of government owned and operated systems with internal users using phishing resistant authenticators
- % for the total of government owned and operated systems where the desired state host inventory matches the actual state host inventory
- % GFE host listed in the desired state host Endpoint Detection and Response (EDR) software inventory matching the actual state host EDR software inventory
- % GFE host listed in the desired state host Application Control inventory matching the actual state host Application Control software inventory
- % GFE host listed in the desired state host Zero Trust Private Access (ZPA) software inventory matching the actual state host ZPA software inventory
- % GFE host listed in the desired state host Data Loss Detection or Prevention (DLD or DLP) software inventory matching the actual state host DLD/DLP software inventory
- % GFE host listed in the desired state host credential vulnerability scan inventory matching the actual state host credential vulnerability scan inventory
- % GFE host listed in the desired state host log forwarding inventory matching the actual state host log forwarding inventory

Calculation/Formula: Targets are established for each of the eight cybersecurity metrics and the performance of each one is calculated separately. The total number of metrics that meet their target establishes the Index Score, e.g., 6 of 8. The calculations for each metric are as follows:

- % of internal users using phishing resistant authenticators: This is the count of internal system users using phishing resistant authenticators divided by the total number or internal system users. The total is then multiplied by 100 to get the percentage for that system
- Remaining Metrics: The calculation for metrics 2 through 8 is the desired state specification (host, software, or configuration) count minus the absolute value of the desired state specification count minus the actual state specification count, divided by the desired state specification count and the total multiplied by 100. For example, If the desired state host count is 100, but the actual state host count (host or application) is 110, the metric is calculated as follow:

$$((100 - (|100-110|)) / 100) * 100 = 90\%$$
$$((100-10)/100) * 100 = 90\%$$
$$(90/100) * 100 = 90\%$$

Definitions:

- GFE: Government Furnished Equipment.
- Phishing resistant authenticator: an authenticator designed to detect and prevent disclosure of authentication secrets and outputs to a website or application masquerading as a legitimate system. Examples authenticators include PIV, FIDO2, and Web Authentication-based authenticators (Source: OMB M-19-17, OMB M-22-09).
- Desired State: A defined value, list, or rule (specification) that a) states or b) allows the computation of the state that the organization desires in order to reduce information security risk (Source: NIST IR 8011-1).
- Actual State: The observable state or behavior of an assessment object (device, software, person, credential, account, etc.) at the point in time when the collector generates security-related information. In particular, the actual state includes the states or behaviors that might indicate the presence of security defects (Source: NIST IR 8011-1).

Data Sources: OCIO's Information Security Continuous Monitoring (ISCM) program, which uses a number of automated systems and reporting mechanisms to collect the data necessary to compile the statistics listed. These systems include vulnerability scanners, directory services, and patch management systems.

Data Collection: The FTC's progress against these targets is tracked manually by OCIO, after aggregating the information from automated systems and manual tracking. OCIO performance staff collects the relevant data to calculate the FTC Cybersecurity Index score.

Data Limitations/Response: The agency uses both automated and manual tracking processes for these metrics; the FTC is working on processes and reporting mechanisms to increase the automation. Manual reporting is reviewed in order to ensure accuracy and completeness. Additionally, the metrics used to develop this score may need to change over time as the agency's cybersecurity program evolves and new Federal guidance or mandates are released.

Metric 3.3.3: Meet project milestones for developing agency records schedules.

Description: In May 2020, the National Archives and Records Administration (NARA) ordered our agency to retain all mission and policy-related federal records temporarily, while the FTC works with NARA to prepare new retention schedules covering these items. NARA has approved records schedules for email, BC-PNO, OED, OIA, OIG, OPA, and parts of OS, and these offices are implementing them. However, several mission and policy related records – including case files, administrative proceedings, Chairman and Commissioner records, OGC records, and web records – remain unscheduled and continue to be subject to the NARA Freeze Order. In order to dispose of outdated record information, the agency must prepare and obtain NARA approval of new retention schedules for these items.

Calculation/Formula: Success will be determined based upon achievement of set project milestones, which are laid out in the Annual Performance Plan.

Definitions:

- NARA: The National Archives and Records Administration.
- Records schedule: The NARA-approved mandatory instructions for the disposition of agency records, including the transfer of permanent records to the National Archives and the disposal of temporary records and non-records.

Data Sources: Agency stakeholders, i.e., the relevant Bureaus and Offices in which the records are maintained, provide information relevant to creating each records schedule.

Data Collection: Submission of records schedules is confirmed by NARA, and NARA determines approval of records schedules, which is also verified by publication of the records schedule in the Federal Register.

Data Limitations/Response: Milestones are contingent upon the timely receipt of responses from relevant Bureau/Office staff. Additionally, the agency's ability to implement any records schedule is subject to NARA's approval.