

Request for Proposals: Economic Data Report Data Verification Audit



Issue Date: July 31, 2017

Deadline for Submissions: September 1, 2017

Proposal Schedule

- July 31, 2017** Request for Proposal (RFP) issued and distributed
- August 21, 2017** Deadline for written questions regarding this RFP
- Please email questions to Michael Arredondo at marredondo@psmfc.org
- August 25, 2017** Q&A document, including the answer to the written questions posted on the PSMFC website at: <http://www.psmfc.org/procurements/blog>
- September 1, 2017** Deadline for submission of proposals
- Proposals must be submitted by e-mail to: marredondo@psmfc.org
- Subject line for submissions: *EDR Audit RFP*
- Faxed and hard copy proposals **will not** be accepted.
- September 4-8th, 2017** Proposal review
- September 8th, 2017** Project finalist selected

Description, Specifications, Criteria and Procedures

Description

Under regulations promulgated by the United States Secretary of Commerce, fishing and seafood processing businesses and associated participants in the Bering Sea and Aleutian Islands Crab Rationalization (CR), American Fisheries Act (AFA), and Amendment 80 (A80) fishery management programs, and groundfish trawl fisheries in the Gulf of Alaska (GOA Trawl), are subject to mandatory annual economic data collection censuses, referred to as Economic Data Reports (EDR). As developed by the North Pacific Fishery Management Council (Council) and implemented by National Marine Fisheries Service (NMFS), EDR requirements for regulated participants in these fisheries are specified under 50 CFR 680.6, 679.65, 679.94, and 679.110, respectively. EDRs are intended to provide employment, cost, sales and other business data to inform the Council's oversight of fishery management through improved analyses of economic performance of affected harvesters and processors participating in these Alaska fisheries, and social and economic effects on associated communities. The Council placed a high priority on data quality assurance (QA) in design of EDR programs. Compliance with EDR submission requirements is mandatory for all subject entities as a condition of federal fishery permit issuance and renewal, and failure to submit required EDR forms in a timely manner is grounds for enforcement action by NMFS Office of Law Enforcement. In addition to these and other data QA elements, the Council specified EDR regulations to include data verification audits of EDR records, to be performed by a qualified financial auditor contracted and authorized to solicit and review financial and other supporting company records from EDR submitters, assess reported data values against supporting records, and verify accurate values.

Data collection and management of EDR programs for Alaska fisheries is administered by the Pacific State Marine Fisheries Commission (PSMFC), under a grant from National Marine Fisheries Service (NMFS) and in collaboration with NMFS Alaska Fisheries Science Center (AFSC). For each distinct category of participant in the respective fisheries, EDR questionnaire forms have been designed to collect quantitative financial and administrative information about business operations with respect to the previous calendar year. Submission due dates are July 31 for the Crab EDR, and June 1 for all other EDR forms. Primary data validation is conducted by PSMFC during the course of data collection and employs automated database processes to identify gross and/or logical reporting errors and obtain submitter corrections where possible. Following completion of primary validation and error correction, the EDR database is further analyzed to identify a subset of records from the most recent 1-2 years of EDR submissions for verification audit, to be conducted by a contracted CPA firm according to protocols described below.

PSMFC is soliciting cost proposals in this RFP for a contractor to implement and complete the third-party verification audit protocols as specified below for EDR forms submitted during calendar year 2016 and 2017 with a potential for annual contract renewal through 2021. We welcome proposals that describe alternative methods or protocols in addition to those specified below, and associated costs, which are aimed at improving the effectiveness and/or efficiency of the data validation process employed by the EDR program to date. A review committee coordinated by PSMFC will review proposals and make a selection. Any individuals or entities that are members of the review committee and who also submit proposals or who may directly benefit from a proposal must recuse themselves from the review process.

Specifications

The data verification audit will be conducted on selected data values reported in individual 2015 and 2016 calendar year EDR forms submitted during 2016 and 2017, respectively. The total set of EDR submissions is comprised of annual EDR forms collected from each participating entity in the respective fishery management program, including each vessel and processor in the BSAI crab program, each catcher processor and quota share permit holder in the A80 program, and each catcher vessel, catcher processor vessel, or shoreside processor participant in GOA groundfish trawl fisheries.¹ An entity that operates two or more vessels or processing facilities subject to EDR requirements is required to submit a separate form for each vessel and/or plant. Distinct EDR forms are used for each of the industry sectors in the respective EDR programs, with questions/data items specifically addressing the nature of production and sales within the sector.²

EDR forms are generally comprised of a certification section, containing identifying information for the entity and a signature statement certifying the reported information as accurate and complete, and a data section containing a series of tabular reporting grids which specify operational, employment, cost, and earnings information to be reported. Validation audits are conducted only on information from the data section. Most data items are reported as annual, calendar year quantity (e.g., hours, pounds, etc) and/or monetary value totals, categorized by one or more stratifying factors (e.g., fishery season, cost category, product type, etc.). A smaller set of data items in EDR records are categorical responses (e.g., yes/no) or annual average rates (e.g., price per pound or gallons per hour). The number of individual, non-zero/non-null data entries reported in a submitted EDR form is variable, depending on the type of form submitted and the number of applicable data items and/or strata. On average, crab catcher vessel EDR submissions report approximately 70 distinct data entries across 16 data items, crab processor EDRs report approximately 280 distinct entries across 18 data items, crab catcher-processor EDRs report approximately 310 distinct entries across 26 data items, GOA trawl catcher vessel EDR forms contain 8 items/entries (no additional stratification), and GOA shoreside processors and Amendment 80 program entities report approximately 80 distinct data entries across 8 and 45 data items, respectively (Table 1).

¹ Participants in the AFA management program are also subject to EDR requirements, but verification audit provisions under 50 CFR 679.65 only apply to data collected in the Compensated Transfer Report form (one of the three EDR forms associated with the data collection). Conditions requiring completion of the form have not occurred to-date within the fishery, and no audit-verifiable data records are expected to be included within the scope of work for this contract.

² The current EDR forms are available for download at http://www.psmfc.org/alaska_crab/ for the BSAI crab EDR program and <http://www.psmfc.org/am80edr/> for the Amendment 80 Trawl Catcher Processor EDR and at <http://www.psmfc.org/goatrawl/index.html> for the GOA Trawl EDRs. Online web application versions of each EDR form are hosted on PSMFC's website, which support more streamlined data entry steps for the submitting entity as well as automatically generating electronic data records; these are used by a majority of submitters, but completed paper forms may be delivered to PSMFC by mail/fax at the option of the submitter.

Table 1: Counts of submitted EDR forms and estimated data elements subject to potential selection for verification audit

EDR type	Data items	2015		2016		Total	
		EDRs	Data entries	EDRs	Data entries	EDRs	Data entries
Crab EDR	58	101	11,850	102	11,610	203	23,460
Catcher/Processor	26	3	930	2	620	5	1,550
Shoreside Processor	18	19	5,320	19	5,320	38	10,640
Catcher Vessel	16	80	5,600	81	5,670	161	11,270
A80 EDR	45	31	2,470	30	2,316	61	4,786
GOA Trawl EDR	16	115	1,759	110	1,665	225	3,424
Shoreside Processor	8	13	943	11	873	24	1,816
Catcher Vessel	8	102	816	99	792	201	1,608
Total		247	16,079	242	15,591	489	31,670

Only a subset of EDR records and data entries are selected for audit verification. All audit selection procedures will be performed by PSMFC/ AFSC³ on the basis of three sets of criteria:

- 1.) **Random selection:** for a predefined set of data items, a subset of EDR records will be randomly selected for verification of reported values;
- 2.) **Outlier selection:** targeted selection of individual data values reported in specific EDR records that fail primary and/or statistical validation tests performed by PSMFC/AFSC and are thus identified as likely reporting errors; and
- 3.) **For-cause selection:** EDR records submitted by entities that have failed to meet minimum standards for timeliness and/or accuracy in current or recent EDR submissions.

EDR records selected for audit will be provided to the contractor in an electronic database file containing the EDR record number, contact information for the submitting entity, and a table of corresponding data items and reported values to be verified, as described in more detail below. Based on EDR audits conducted to date and revised sampling procedures to be employed, it is anticipated that

³ In prior RFPs and contracts for EDR verification audits, the procedure for random audit selection was included in the scope of work to be performed by the contractor. The random sampling procedure previously specified a sampling formula and minimum sampling rate designed to support statistical inferences of audit results from the respective audit samples to the associated populations of EDR records. This RFP revises the audit selection process, which will be performed entirely by PSMFC/ASFC.

the total number of individual EDR records, distinct data items, and distinct data values selected for audit will be as follows:

Table 2: Estimated counts of EDR records selected for audit verification

EDR Program	Estimated audit selections per year		
	EDRs	Data items	Data entries
Crab EDR	25	15	300-375
A80 EDR	10	10	100-125
GOA Trawl EDR	30	8	350-450
Total per year	65	33	750-950
Total	130	40	1500-1900

The A80/GOA Trawl EDRs are due to PSMFC annually on June 1st, and the Crab EDRs are due to PSMFC on July 31st of each year. Time required to complete primary validation, finalization of electronic EDR records, and outlier detection/selection may require up to six weeks. Although there is some uncertainty regarding the date by which EDR records will be finalized and selected for audit, assume for the purposes of this proposal that all EDR data records subject to verification audit will be available to the contractor by September 30, 2017.

Scope of Work

The general protocol for validating EDR data values is the following:

PSMFC/NMFS will select EDR records for audit based on random, outlier, or for-cause criteria outlined above. In all cases, the verification procedures are largely the same. NMFS will identify a subset of EDR data items (variables) to be audited in all random and non-random audits. The subset of data items selected for audit varies each year, but typically comprises a set of 5-15 separate elements for each sector/form. Additional data items may be identified for specific non-random audits. The auditor will review the EDR records and communicate with the submitters to request supporting records for the specific items to be verified. The auditor may request and review copies of additional data or records provided by the EDR submitter, including but not limited to: previously audited or reviewed financial statements, worksheets, tax returns, invoices, receipts, and other original documents substantiating the data. It is not possible to define the exact nature of the supporting information an auditor may be provided with when conducting an audit because each company has their own style of financial recordkeeping. Some follow-up communication may be necessary to identify and receive the necessary records.

Using the supporting records supplied by the EDR submitter, the auditor will validate the reported values. Validation includes evaluating the quality of supporting documentation supplied as the basis for verification of reported EDR values; identification and classification of reporting errors; and, where possible, identifying a correction and quantifying the amount of reporting error for each audited data value. Some of the information collected in EDRs is not maintained in submitter records exactly as described in the EDR form, requiring the submitter to derive or approximate the value to report (e.g. by pro rata distribution). In these instances, the method of approximation and any calculations must be documented by the submitter to be validated. The auditor will review and evaluate the methods used for consistency with standard accounting practices, validate calculations, and where appropriate,

quantify the error and identify a correction. Criteria for validation and classification of supporting records and reporting errors are described below.

Validation results for each audited data entry will be recorded by auditors in a database that is appropriately structured for import into a relational database by PSMFC. Conformance to database standards and attention to data integrity in recording and conveyance of audit result data to PSMFC is a critical element in the proposal evaluation. In addition, the auditor will provide a document summarizing the methods and results, including any additional quantitative and/or qualitative findings not captured in the audit results database.

The Auditor shall not complete and/or submit Economic Data Reports (EDR) as the designated representative of an EDR submitter while under contract for this work. In the event that the Auditor knowingly provides information for a client for the express purpose of reporting in an EDR, the Auditor must disclose this fact when samples are being selected for this audit.

Selection of audits and data preparation:

- NMFS will select the EDR data items from each respective EDR form to be audited for all audits (between 4 and 15 items from each, for a total of no more than 40 distinct data items).
- NMFS will analyze the EDR data submitted for anomalies and select records as appropriate for non-random audits.
- NMFS will select additional EDR records from each sector at random, depending on the number of records selected on non-random basis; no more than 65 records per EDR year will be selected in total over all sectors for BSAI Crab EDRs, A80 EDRs, and GOA Trawl EDRs, with no more than 2,000 unique data entries to audit.
- PSMFC will compile the data from selected EDRs into a tabular data report from which the Auditor will validate as agreed to with PSMFC.
- PSMFC will supply the contact information and assist with making arrangements between the Auditor and the EDR submitter.

Data verification and analysis:

- The Auditor will contact and solicit supporting information from the selected EDR submitters for data items specified by NMFS.
- The Auditor will review and verify reported values based upon supporting information provided. For each reported data value audited, verification includes:
 - Evaluate and classify the quality of supporting documentation supplied as the basis for verification of reported EDR values
 - Evaluate methods and calculations used to derive or approximate the reported value
 - Identify and classify reporting errors
 - Where possible, identify an appropriate correction to the reported value and quantify the amount of reporting error
 - Criteria and codes for classification of qualitative results are provided below
- The Auditor will follow up on missing or inaccurate data to validate and correct the data.

- The Auditor will identify and confirm with the submitter appropriate changes to data when missing or inaccurate.
- The Auditor will identify general problems with the data and the data collection process (e.g., the EDR forms and instructions, submission deadlines, submitter compliance) and make recommendations for future reporting as appropriate.

Deliverables:

Progress reports

- The Auditor will submit verbal or written updates to PSMFC and NMFS every two to three weeks to validate work and resolve questions or issues encountered.
- Progress reports will act as intermittent deliverables to ensure quality of work and to address any problems that may arise throughout the project.
- Invoices should include number of hours charged to project for recordkeeping and budgeting purposes.
- Charges for expenditures should be listed on the invoice as a separate line item.
- Final invoice should be marked “Final”.

Audit results database

- Upon completion of all audit validation procedures, results will be delivered to PSMFC in an electronic database table, with each record containing results for a single audited data entry, including original value reported, validated value identified by auditors (equaling either the original value or a corrected value), and coded results of auditors assessment of quality of support for both the original and validated/corrected value. Table 3 below is an example of the tabular format of audit results data to be provided to PSMFC by the Auditor.

- **Table 3: Format of tabular audit results data**

BookletID	Table name	Variable name	Original Value	Original Support Analysis (Code 1-10)	Validated Value	Validated Support Analysis (Code 1,5,6,7,9 or 10)
2010V-4000A	5.2 Capital Expenditures	Total_ expenditure	250,456	6	254,005	5

- Depending on database software available to the Auditor (Microsoft Access, Excel, etc.), PSMFC will work with the Auditor to provide a file structure and format for recording audit results
 - PSMFC will provide the contact information, BookletID, Table name, Variable name (description of data item as it is listed in the EDR and referenced in the EDR database), and Original Value of each variable to be audited.

- The Auditor will provide the “Original Support Analysis” code of 1-10, “Validated Value” identified by auditors (equaling either the original value or a corrected value), and the “Validated Support Analysis”.
- Support analysis classification codes are shown in Table 4 below.

Table 4: Support analysis codes

Audit codes	Documented support for Original Value	Documented support for Verified Value	Validation result	Measurement error effect type	Correction
1*	Yes	Yes (same as original)	No error; reported value is clearly substantiated by complete records. [Zero handling: Original value is "0":Correct value = 0 (no correction). Original and corrected code = 1.]	None	No
1T*	Yes	Yes (same as original)	Original value is blank or 'N/A': Correct value = 0 (not counted as error for fail letters)	None	No
2	Yes	Yes (same as original)	Calculation error	Respondent	Yes
2T	Yes	Yes (same as original)	Observable typographic error on the respondent's part	Respondent	Yes
3	Yes	Yes (same as original)	Misinterpretation of question	Questionnaire - wording	Yes
4	Yes	Yes (same as original)	Estimate is based on original documentation but flawed assumptions/logic	Questionnaire - specification + Respondent	Yes
5*	Yes	Yes (same as original)	Data cannot be reported precisely as specified in EDR form and must be estimated; estimate is based on appropriate documentation and sound assumptions/logic and is considered validated	Questionnaire - specification	No
6*	Yes	Yes (updated)	Original value was reported correctly based on original documentation, but corrected based on updated documentation	Questionnaire - specification	Yes
7*	No	No	Reported value is "best guess", not derived from records; no valid value is available	Questionnaire - specification + Respondent	No
8	No	Yes (new)	Original value is unsubstantiated; correction based on new documentation	Questionnaire - specification + Respondent error	Yes
9*	No	No	No data reported	None	No **PSMFC enters -9 values in database UR notes to indicate known item nonresponse.
10*	No	No	Item "Not Applicable" to vessel	None	No **PSMFC enters -7 values in database UR notes to indicate non-applicability of the data element.
Document	Yes	Yes (same as original)	Primary key error is defined as an error in the categorization of the reported value by a stratifying variable	Respondent	Yes

Audit codes	Documented support for Original Value	Documented support for Verified Value	Validation result	Measurement error effect type	Correction
			(e.g., fishery code, location code, product code, etc.), rather than an error in the reported value itself. For example, a submitter accidentally records EAG fishery activity in the row for the WAG fishery.		
Document	Yes	Yes (same as original)	Administrative errors should be documented in such a way that PSMFC can identify where corrections to the database need to be made; and AFSC can identify the respondent's original reported value as distinct from any error introduced by the administrative data entry process.	Administrative	Yes
*denotes audit codes that should be used to classify corrected values					
see "Zero handling audit_comments_090711.doc" for more information on handling zero value and typos					

Final project report

- A brief document outlining Methods and Conclusions of the audit, with tabulated summary results for each data item audited, including:
 - Describe quality of records provided for support (3rd party documentation vs. calculations on the back of envelopes)
 - General compliance with audits (did they have to be continually reminded to provide documentation or did they provide all that you needed at the first request?)
 - Did you notice any directional bias in the data (generally provided lower values in the EDR vs. what was found in the audit?)
 - Difficulty with particular questions in the EDR
 - Estimates by submitters on how long it took to complete EDR initially
 - Estimates by submitters on how long it took to prepare for audit
 - Figure 1 below is an example of presentation of summary audit results for one EDR data item (variable) in the final audit report document
- Examples of the most recent final reports are located at:
 - http://www.psmfc.org/alaska_crab/documents/2014_audit_results.pdf
 - http://www.psmfc.org/am80edr/documents/2014_audits.pdf

Variable 1: Table 3 – Revenue: Total fishery product sales volume (in mT)

Support Analysis Code	Initial Reporting		Corrected Reporting	
	# of Vessels	% of Total	As Corrected # of Vessels	As Corrected % of Total
1	17	94%	18	100%
2T	1	6%	0	0%
Total	18	100%	18	100%

Support analysis code in (#) below and description of support provided:

- (1) Seventeen vessels provided support for the initial values, which were substantiated by the 2014 sales summary reports or detailed sales listings.
- (2T) One vessel provided support for the initial value, which was substantiated by the 2014 sales summary report; however, the values reported are an observable typographic error on the respondent's part. The corrected support analysis was updated to a (1). This vessel provided sales summary report.

Figure 1- Example of summary audit results for one EDR data item (variable)

Submitter feedback letters

- In conference with PSMFS & NMFS, the results of the audit will be reviewed and NMFS will determine the number or errors and types of errors that signify where the break lies to determine who receives a Well-supported/Semi-supported/Fail letter.
 - Well-supported/Semi-supported/Fail letters will be reviewed and updated by NMFS if needed.
 - Well-supported/Semi-supported/Fail letters include the audited results for each company's EDR in a % error format so as not to release confidential data.
 - The auditors will then mail letters with audit results to the audited companies and provide PSMFC with an electronic copy of letter they were mailed (well supported, semi supported, failed audit) for the record and for future possible enforcement action.

Supporting documents

- After the data validation is concluded, all supporting documents provided to Auditor will be delivered by secure carrier to PSMFC for archiving.

Proposals

Please provide the final hourly rate you would bill to PSMFC for conducting this work. Include with it the position titles of employees involved, their hourly rate and the tasks that that position would be involved with.

For example:

Principle Lead @\$150/hour	CPA @ \$120/hour	Clerk @ \$45/hour
<ul style="list-style-type: none">• Signs contract• Finalizes methodologies with PSMFC and NMFS• Writes final report	<ul style="list-style-type: none">• Data checking• Conducts audits	<ul style="list-style-type: none">• Writes summary reports on audits• follows up with submission of supporting documents

Proposal Evaluation Criteria

The following criteria and evaluation weightings will be used for evaluating proposals:

1. **Staff experienced in working with West Coast and/or Alaska Financial Fishery data. (35 percent)** The Auditing party must demonstrate that they have knowledge of West Coast and/or Alaska fisheries, and have worked with financial fisheries data.

2. **Cost and time proposed to complete (25 percent)** Provide total cost per hour that you would bill PSMFC for conducting the Data Review, Audits and Reporting. Crab EDR audits will need to be invoiced separately from A80& GOA Trawl EDR audits as the two funding sources are distinctive. Identify position titles, their hourly wage and tasks each position would be involved with. Please provide an estimated time to complete verification for the 2015 & 2016 years (assume you will receive the contact list, audit variables and the data by October 1).
3. **Feasibility and design of proposed auditing and verification process (40 percent)**. Please describe the methodology you plan to use to verify that the information reported in the EDRs is consistent with that contained in the submitter's financial records (e.g., forensic accounting methodologies, record checking). Describe how you plan to select EDRs for random auditing and present the statistical sampling method you will use to decide the number of audits to perform. Describe how you plan to minimize or eliminate the possibility for strategic reporting behavior by submitters.

PSMFC CONTACT

Michael Arredondo, Contracts Specialist, is the PSMFC staff member designated for receipt of proposals, modifications, and questions regarding this solicitation. His contact info is as follows:

Michael Arredondo, Contracts Specialist
(503) 595-3100 x3228
marredondo@psmfc.org

QUESTIONS

Questions regarding this solicitation must be submitted via email to Michael Arredondo (michael@psmfc.org) by 08/21/2017. Responses to all questions containing information that is not covered in this solicitation will be distributed to all known offerors and posted on the PSMFC Internet web site at <http://www.psmfc.org/procurements/blog>.

AMENDMENTS TO SOLICITATIONS

If this solicitation is amended, all terms and conditions that are not amended remain unchanged. Offerors shall acknowledge receipt of any amendment to this solicitation by the date and time specified in the amendment(s).

EXTENSION OF SOLICITATION

PSMFC reserves the right to extend the submission times specified in this solicitation. Potential offerors desiring an extension must submit a written request to the Contracting Officer prior to the time specified in this solicitation for receipt of proposals that includes the amount of additional time requested and an explanation of why such an extension is required. If an extension is granted, PSMFC will notify all known offerors and will post a notice of such extension on its Internet website at <http://www.psmfc.org/procurements/blog>.

SUBMISSION, MODIFICATION, REVISION AND WITHDRAWAL OF PROPOSALS

Proposals and modifications to proposals must be submitted via email to Michael Arredondo at marredondo@psmfc.org.

The proposal must show--

1. The name of the solicitation;
2. The name, address, telephone and facsimile numbers and email address of the offeror;
3. Names, titles, telephone and facsimile numbers and email addresses of persons authorized to negotiate on the offeror's behalf with the PSMFC in connection with this solicitation; and
4. Name, title, and signature of person authorized to sign the proposal. Proposals signed by an agent shall be accompanied by evidence of that agent's authority, unless that evidence has been previously furnished to the issuing office.
5. A description of the offeror's company and employee experience profile.
6. A technical proposal that includes information on how the project is to be organized, staffed, and managed.

Offerors are responsible for submitting proposals, and any modifications or revisions, so as to reach the designated PSMFC Contracting Officer by 5:00 p.m., Pacific, on 09/01/2017.

Late proposals:

Any proposal, modification, or revision received at the PSMFC office designated in the solicitation after the exact time specified for receipt of offers is "late" and will not be considered unless it is received before award is made, the Contracting Officer determines that accepting the late offer would not unduly delay the acquisition; and--

- There is acceptable evidence to establish that it was received at the PSMFC installation designated for receipt of offers and was under the PSMFC's control prior to the time set for receipt of offers; or
- It is the only proposal received.

However, a late modification of an otherwise successful proposal that makes its terms more favorable to the PSMFC, will be considered at any time it is received and may be accepted.

Acceptable evidence to establish the time of receipt at the PSMFC installation includes the time/date stamp of the PSMFC email server, other documentary evidence of receipt maintained by the installation, or oral testimony or statements of PSMFC personnel.

If an emergency or unanticipated event interrupts normal PSMFC processes so that proposals cannot be received at the office designated for receipt of proposals by the exact time specified in the solicitation, and urgent PSMFC requirements preclude amendment of the solicitation, the time specified for receipt of proposals will be deemed to be extended to the same time of day specified in the solicitation on the first work day on which normal PSMFC processes resume.

Proposals may be withdrawn by written notice received at any time before award.

Offerors shall submit proposals in response to this solicitation in English and in U.S. dollars.

Offerors may submit modifications to their proposals at any time before the solicitation closing date and time, and may submit modifications in response to an amendment, or to correct a mistake at any time before award.

Offerors may submit revised proposals only if requested or allowed by the Contracting Officer.

Proposals may be withdrawn at any time before award. Withdrawals are effective upon receipt of notice by the Contracting Officer.

Offerors may submit proposals that depart from stated requirements. Such proposals shall clearly identify why the acceptance of the proposal would be advantageous to the PSMFC. Any deviations from the terms and conditions of the solicitation, as well as the comparative advantage to the PSMFC, shall be clearly identified and explicitly defined.