

Office of Inspector General Committee for Purchase From People Who Are Blind or Severely Disabled (U.S. AbilityOne Commission)

August 26, 2021

FOR: Kimberly M. Zeich

Executive Director (Acting) U.S. AbilityOne Commission

FROM: Rosario A. Torres, CIA, CGAP

Assistant Inspector General for Audit

U.S. AbilityOne Commission

SUBJECT: Quarterly Audit Recommendation Status Report

We are pleased to provide the Office of Inspector General (OIG) Quarterly Audit Recommendation Status Report. As of July 30th, 2021, there are 81 open recommendations, 36 of which are considered "Overdue," and another 26 reported by management as "Implemented." Since the date of the OIG's last semiannual report to Congress, dated March 31st, 2021, 13 new recommendations were added, and no recommendations were closed.

If you have any questions pertaining to the status report, please contact me at (703) 772-9054 or rtorres@oig.abilityone.gov.

Enclosure: Quarterly Audit Recommendation Status Report

cc: Irene V. Glaeser
Deputy Executive Director (Acting)
U.S. AbilityOne Commission

Kelvin Wood Chief of Staff U.S. AbilityOne Commission

George V. Govan Chief Financial Officer U.S. AbilityOne Commission

Edward Yang Chief Information Officer U.S. AbilityOne Commission



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August 26, 2021

Rosario Torres Office of Inspector General U.S. AbilityOne Commission 355 E. Street, SW Washington, DC 20024

Dear Mr. Torres:

Enclosed is the Quarterly Audit Recommendation Status Report for the U.S. AbilityOne Commission (Commission) as of July 30, 2021. CliftonLarsonAllen LLP (CLA) prepared this report based on the listing and analysis of the status of open recommendations provided by the Office of Inspector General (OIG) for the Commission as of that date. A summary of the source of these recommendations and the responsible Audit Follow-Up Official (AFO) at the Commission is presented below in *Figure 1*.

Figure 1: Summary of Open Audit Recommendations

Source	Number of Open Recommendations	Audit Follow-Up Official ¹
Performance Audits	32	PMO
Federal Information Security Modernization Act (FISMA) Evaluations	9	CIO
Audited Financial Statements	40	CFO
Total	81	

Source: CLA analysis of status of open audit recommendations provided by OIG

As of July 30, 2021, there are 81 open recommendations, 36 of which are considered "Overdue." Since the date of the OIG's last semiannual report to Congress as of March 31, 2021, 13 new recommendations were added, and no recommendations were closed.

² An open recommendation is considered "overdue" if OIG has not received documentation that supports managements assertion of implementation prior to the recommendation's target implementation date.



¹ Legend for Audit Follow-Up Official is as follows:

CFO - Office of the Chief Financial Officer

CIO - Office of the Chief Information Officer

PMO – Director of the Program Management Office

We understand that the OIG considers a recommendation "Open" or "Closed" based on actions that the Commission's management takes or plans to take in response to the recommendation. OIG considers a recommendation "Closed" when:

- 1) the responsible AFO completes actions necessary to implement the recommendation and provides OIG with evidence of the final completed actions or other justifications; and
- 2) OIG or the delegated Independent Public Accounting firm (IPA) reviews the evidence provided and determines that no additional action is required. With respect to the performance audit recommendations, the OIG has engaged CLA to review the supporting documentation provided to determine if recommendations can be closed, and to notify the OIG if a follow-up audit to determine effectiveness is required prior to closure. For the financial statement audit and FISMA recommendations, the respective IPA will manage the status of the recommendations and determine closure during the annual audit process. CLA is only required to obtain the status directly from the IPAs or the OIG and update the attached report accordingly.

Further details on the actions taken by the responsible AFO regarding the open audit recommendations are presented in *Figure 2* below.

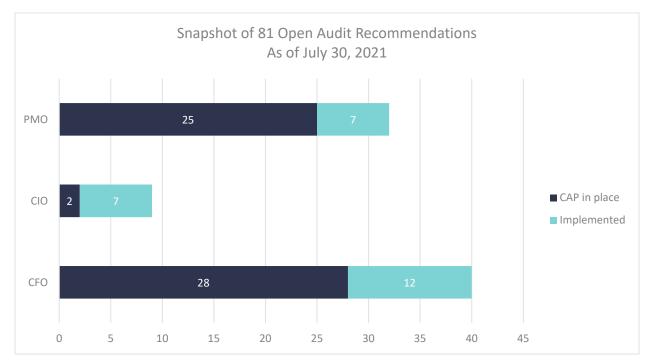


Figure 2: Status of Management's Actions Taken for Open Audit Recommendations

Source: CLA analysis of status of open audit recommendations provided by OIG

1) The Director of the PMO, CIO, and CFO submitted corrective action plans (CAPs) for 55 recommendations. As of July 30, 2021, implementation of 36 of these 55 CAPs are considered "Overdue" (refer to *Figure 3* below for a summary by responsible AFO).

CFO CAP in place
CIO CAP in place
PMO CAP in place

Figure 3: Overdue CAPs by Responsible AFO

Source: CLA analysis of status of open audit recommendations provided by OIG

2) The Director of the PMO, CIO, and CFO reported 26 recommendations as "Implemented." As discussed above, these recommendations remain open until CLA or other responsible IPA obtains and reviews supporting documentation submitted to support their assertion.

Please contact me with any questions on the information provided.

Sincerely,

CliftonLarsonAllen LLP

Mia Leswing, CPA, CISA, CGFM Principal 571-227-9607

Mia.Leswing@claconnect.com

Enclosure

No.	Panart Shart Nama	Recommendation	Est. Comp.	Current Status (Per OIG)	Responsible Office ¹	Recommendation Progress (Per Agency)
1	Report Short Name		Date			(Per Agency)
1	FY2019 Financial Statement Audit	Become familiar with OMB Circular A-136 and other authoritative guidance relating to financial reporting requirements to better oversee the performance of its shared service provider and to ensure that its reporting requirements are being fulfilled.	6/10/2020	Open	CFO	Implemented
2	FY2019 Financial Statement Audit	Advise the service provider that outdated/superseded guidance was used in the preparation of its financial statements and footnotes so that this issue can be addressed by the service provider in the future.	6/10/2020	Open	CFO	Implemented
3	FY2019 Financial Statement Audit	Request that the service provider begin preparing and submitting third quarter notes to the financial statements, in compliance with the financial reporting requirements which apply to agencies subject to the Accountability of Tax Dollars Act (ATDA) and take adequate steps to ensure that all of the year-end notes are included.	6/10/2020	Open	CFO	Implemented
4	FY2019 Financial Statement Audit	Request that the service provider enhance its current review procedures to identify errors and omissions in the required financial statements and footnotes and to ensure that all required presentation and disclosure requirements have been met.	6/10/2020	Open	CFO	Implemented

¹ Legend for Responsible Office is as follows:

CFO – Office of the Chief Financial Officer

CIO – Office of the Chief Information Officer

PMO – Director of the Program Management Office

No.	Report Short Name	Recommendation	Est. Comp. Date	Current Status (Per OIG)	Responsible Office ¹	Recommendation Progress (Per Agency)
5	FY2019 Financial Statement Audit	In accordance with generally accepted accounting principles (GAAP), ask the Commission's General Counsel to identify loss contingencies relating to legal matters that should be recorded in the agency's general ledger and/or disclosed in the notes to the financial statements and instruct the service provider to record these entries and/or disclose these amounts, as appropriate.	6/10/2020	Open	CFO	Implemented
6	FY2019 Financial Statement Audit	Commission management develop a procedure to review disbursements made early in the subsequent reporting period to identify items which should be included in its year-end accounts payable or develop an alternative procedure which appropriately estimates the amount of these liabilities at year-end.	6/10/2020	Overdue	CFO	Corrective Action Plan (CAP) in place
7	FY2019 Financial Statement Audit	Commission management independently verify the amounts recorded for accrued liabilities by its shared service provider or participate in the calculation of the recorded amounts.	6/10/2020	Overdue	CFO	CAP in place
8	FY2019 Financial Statement Audit	Commission management develop written policies and procedures for the financial reporting process, including procedures to identify and perform (or assist its service provider in preparing) year-end entries to the general ledger that are required by generally accepted accounting principles.	6/10/2020	Overdue	CFO	CAP in place
9	FY2019 Financial Statement Audit	Commission management develop written policies and procedures which define the roles and responsibilities of the service provider and Commission staff in performing financial reporting functions.	6/10/2020	Overdue	CFO	CAP in place

No.	Report Short Name	Recommendation	Est. Comp. Date	Current Status (Per OIG)	Responsible Office ¹	Recommendation Progress (Per Agency)
10	FY2019 Financial Statement Audit	We recommend that the Commission consider performing routine reviews of employee benefit elections and Official Personnel Files (OPFs) to ensure they are complete and accurate and address this issue with its shared service provider to ensure that OPM guidance is appropriately followed with respect to the Commission's personnel records.	6/10/2020	Overdue	CFO	CAP in place
11	FY2019 Financial Statement Audit	We recommend that the Commission management develop and document a process to evaluate its internal controls over financial reporting which provides (1) an assessment of the effectiveness of the organization's internal controls to support reliable financial reporting, effective and efficient programmatic operations, and compliance with applicable laws and regulations, and (2) an assessment of whether financial management systems comply with Federal financial management systems requirements.	6/10/2020	Overdue	CFO	CAP in place
12	FY2019 Financial Statement Audit	Ensure that new obligations are recorded only within the current fiscal year, as required by law.	6/10/2020	Overdue	CFO	CAP in place
13	FY2019 Financial Statement Audit	Ensure that no payment reclassifications are performed between TAS unless the payment documentation is sufficient to show that the payment was applied to another TAS in error and there are sufficient existing obligated balances in excess of the amount(s) of the payment(s).	6/10/2020	Overdue	CFO	CAP in place
14	FY2019 Financial Statement Audit	Ensure that all obligations recorded to the general ledger are properly supported (i.e., the obligated amount recorded agrees to the obligating document).	6/10/2020	Overdue	CFO	CAP in place

No.	Report Short Name	Recommendation	Est. Comp. Date	Current Status (Per OIG)	Responsible Office ¹	Recommendation Progress (Per Agency)
15	FY2019 Financial Statement Audit	Open and complete a review into the potential ADA violation noted and report to the appropriate parties, as necessary, so that the Commission can determine if an actual violation occurred.	6/10/2020	Open	CFO	Implemented
16	FY2020 Financial Statement Audit	Advise the service provider of, and request compliance with, the preparation and submission deadlines for the preparation of its financial statements and required variance analyses so that this issue can be addressed by the service provider in the future.	5/12/2021	Overdue	CFO	CAP in place
17	FY2020 Financial Statement Audit	Request the service provider to begin preparing and submitting third quarter notes to the financial statements by the OMB submission deadline, in compliance with the financial reporting requirements which apply to all agencies subject to the Accountability of Tax Dollars Act (ATDA).	5/12/2021	Open	CFO	Implemented
18	FY2020 Financial Statement Audit	If a waiver or exemption of the OMB Circular A-136 reporting requirements is deemed to be necessary, then the Commission should submit a request to OMB for consideration and obtain OMB's response in writing which formally waives this requirement.	5/12/2021	Open	CFO	Implemented
19	FY2020 Financial Statement Audit	If the required statements, variance analyses, and footnotes are not submitted by the service provider on its behalf, then the Commission should consider submitting them to OMB directly.	5/12/2021	Overdue	CFO	CAP in place
20	FY2020 Financial Statement Audit	Continue to gain knowledge of OMB Circular A-136 and other authoritative guidance relating to financial reporting requirements to better oversee the performance of the Commission's shared service provider and to ensure that the Commission's reporting requirements are being fulfilled, including those relating to the	5/12/2021	Open	CFO	Implemented

No.	Report Short Name	Recommendation	Est. Comp. Date	Current Status (Per OIG)	Responsible Office ¹	Recommendation Progress (Per Agency)
		submission of interim financial statements and footnotes and the proper recording and reporting of loss contingencies.				
21	FY2020 Financial Statement Audit	Continue to implement management's corrective action plan, including the filling of vacant positions.	5/12/2021	Open	CFO	Implemented
22	FY2020 Financial Statement Audit	Consider preparing its own financial statements and footnotes, both at interim and year-end, if the service provider cannot provide complete and accurate financial statements and footnotes timely.	5/12/2021	Open	CFO	Implemented
23	FY2020 Financial Statement Audit	Commission management should develop written policies and procedures for the financial reporting process, including procedures to identify and review year-end entries to the general ledger to ensure that they have been recorded in accordance with generally accepted accounting principles.	5/12/2021	Overdue	CFO	CAP in place
24	FY2020 Financial Statement Audit	The incoming Chief Financial Officer or other Commission personnel knowledgeable in accounting and finance should independently verify the amounts recorded for accrued liabilities by its shared service provider and examine the entries that the service provider has recorded in its general ledger.	5/12/2021	Overdue	CFO	CAP in place
25	FY2020 Financial Statement Audit	The Commission should consider performing routine reviews of employee benefit elections and Official Personnel Files (OPFs) to ensure they are complete and accurate and address this issue with its shared service provider to ensure that OPM guidance is appropriately followed with respect to the Commission's personnel records.	5/12/2021	Overdue	CFO	CAP in place

No.	Panart Shart Nama	Recommendation	Est. Comp.	Current Status (Per OIG)	Responsible Office ¹	Recommendation Progress (Per Agency)
26	Report Short Name FY2020 Financial Statement Audit	The Commission should consider obtaining replacement copies of missing records that have been identified and either provide these documents to the service provider so that the information can be maintained in the e-OPF or consider developing and implementing its own repository of documentation to ease the retrieval and response process.	5/12/2021	Overdue	CFO	CAP in place
27	FY2020 Financial Statement Audit	The Commission should continue to implement the actions identified in its corrective action plan dated September 30, 2020.	5/12/2021	Overdue	CFO	CAP in place
28	FY2020 Financial Statement Audit	The incoming Chief Financial Officer or other Commission personnel knowledgeable in accounting and finance should work with the service provider to identify, at least quarterly, upward adjustments that have been offset by downward adjustments in the general ledger so that manual adjustments can be recorded to properly state the ending balances of both accounts.	5/12/2021	Overdue	CFO	CAP in place
29	FY2020 Financial Statement Audit	Commission management should work with its service provider to design and implement policies and procedures which enhance the internal review process for upward and downward adjustment transactions and includes a reconciliation of the UDO balances with the supporting documentation to ensure that transactions have been recorded correctly.	5/12/2021	Overdue	CFO	CAP in place
30	FY2020 Financial Statement Audit	To ensure that billing and collection activities are complete and timely, the Commission should initiate (or instruct its service provider to initiate) IPACs to receive reimbursement payments from the Requesting Agency at the same time that the transmittal form approving the vendor payment is submitted to the service provider for processing.	5/12/2021	Overdue	CFO	CAP in place

No.	Report Short Name	Recommendation	Est. Comp. Date	Current Status (Per OIG)	Responsible Office ¹	Recommendation Progress (Per Agency)
31	FY2020 Financial Statement Audit	The incoming Chief Financial Officer or other Commission personnel knowledgeable in accounting and finance should independently verify the amounts recorded for reimbursable activity by its shared service provider or participate in the calculation of the recorded amounts.	5/12/2021	Overdue	CFO	CAP in place
32	FY2020 Financial Statement Audit	The incoming Chief Financial Officer or other Commission personnel knowledgeable in accounting and finance should develop a procedure to identify accrued liabilities for reimbursable expenses which should be also be recorded as accrued accounts receivable.	5/12/2021	Overdue	CFO	CAP in place
33	FY2020 Financial Statement Audit	Commission management should develop written policies and procedures for the financial reporting process, including procedures to identify and perform (or assist its service provider in preparing) year-end entries to the general ledger that are required by generally accepted accounting principles.	5/12/2021	Overdue	CFO	CAP in place
34	FY2020 Financial Statement Audit	Commission management should record the proposed adjusting entries in order to correct the errors identified.	5/12/2021	Open	CFO	Implemented
35	FY2020 Financial Statement Audit	Fulfill the requirements of 31 USC §1517(b) by reporting the FY 2019 violations to the President, Congress, and the Comptroller General of the United States.	5/12/2021	Overdue	CFO	CAP in place
36	FY2020 Financial Statement Audit	Ensure that new obligations are recorded only within the current fiscal year, as required by law.	5/12/2021	Overdue	CFO	CAP in place
37	FY2020 Financial Statement Audit	Ensure that no payment reclassifications are performed between TAS unless the payment documentation is sufficient to show that the payment was applied to another TAS in error and there are	5/12/2021	Overdue	CFO	CAP in place

No.	Report Short Name	Recommendation	Est. Comp.	Current Status (Per OIG)	Responsible Office ¹	Recommendation Progress (Per Agency)
		sufficient existing obligated balances in excess of the amount(s) of the payment(s).				
38	FY2020 Financial Statement Audit	Ensure that all obligations recorded to the general ledger are properly supported (i.e., the obligated amount recorded agrees to the obligating document).	5/12/2021	Overdue	CFO	CAP in place
39	FY2020 Financial Statement Audit	Open and complete a management review into the new potential ADA violations noted and report to the appropriate parties, as necessary, so that the Commission can determine if an actual violation occurred.	5/12/2021	Overdue	CFO	CAP in place
40	FY2020 Financial Statement Audit	Continue to implement the measures established in the Commission's corrective action plan, dated September 30, 2020.	5/12/2021	Overdue	CFO	CAP in place
41	FY2020 FISMA	The Commission should follow their vulnerability remediation policies.	3/31/2021	Open	CIO	Implemented
42	FY2020 FISMA	Scanning should be run on a monthly basis, however if there are medium and/or high vulnerabilities, then they should be remediated, and the scan should be repeated and run again.	3/31/2021	Open	CIO	Implemented
43	FY2020 FISMA	The Commission should identify any deficiencies (through the development of the SSP) and they should be documented on the SAR.	3/31/2021	Open	CIO	Implemented
44	FY2020 FISMA	Once the SAR is completed, the Accrediting Official (AO) should sign off on the SAR indicating their acceptance of risk for this system to be in a production environment.	3/31/2021	Open	CIO	Implemented
45	FY2020 FISMA	All deficiencies identified on the SAR should then be categorized by risk (low, medium, and high) and then formalized POA&Ms should be created. The POA&Ms should contain the hours needed	3/31/2021	Overdue	CIO	CAP in place

No.	Report Short Name	Recommendation	Est. Comp.	Current Status (Per OIG)	Responsible Office ¹	Recommendation Progress (Per Agency)
1101	neport onort rume	to remediate the deficiency, personnel required, timeline, and	Date	(1 61 616)	O THICE	(i ci / igeney)
		cost.				
46	FY2020 FISMA	IT should ensure that backed up data is encrypted.	11/20/2020	Open	CIO	Implemented
47	FY2020 FISMA	All users should have their IDs automatically disabled after a period of 90 days of inactivity.	12/31/2020	Open	CIO	Implemented
48	FY2020 FISMA	Finalize the Mobile Device Policy and ensure that users of the systems adhere to the stipulations outlined within the Policy.	11/20/2020	Open	CIO	Implemented
49	FY2020 FISMA	Ensure that IT finalizes the Enterprise Architecture Policy and then disseminates it to appropriate personnel.	12/31/2020	Overdue	CIO	CAP in place
50	Program Fee	We recommend the Commission require the Commission Staff to develop and implement effective policy and procedures on the Program Fee Ceiling criteria and methodology for determining the fee ceiling on the CNAs including aligning legacy and draft policy with the criteria in the Cooperative Agreements.	3/31/2020	Overdue	PMO	CAP in place
51	Program Fee	We recommend the Commission require the Commission Staff, to work jointly with the CNAs to issue and implement a policy on the methodology for the CNAs to calculate the Program Fee.	3/31/2020	Overdue	PMO	CAP in place
52	Program Fee	The Commission should follow GAO 14-704G, Standards for Internal Control in the Federal Government, Principles 10-15. The principles will assist the Commission to develop, design, and implement timely guidance that is supported by quality information.	3/31/2020	Overdue	PMO	CAP in place
53	Program Fee	In order to effectively manage the Program fee, the Commission should complete a workforce analysis to determine Commission staffing requirements based on major mission activities and cross-cutting priority goals.	6/17/2020	Overdue	PMO	CAP in place

No.	Report Short Name	Recommendation	Est. Comp. Date	Current Status (Per OIG)	Responsible Office ¹	Recommendation Progress (Per Agency)
54	Program Fee	In order to support and inform decision-making processes and ensure effective and greater communication and reporting on the analysis being completed, the Commission should review and analyze the Fee and Expenditure Reports and other materials received from the CNAs for opportunities to use a variety of	6/17/2020	Open	PMO	Implemented
55	Cooperative Agreement Audit	analytical, research, and evaluation methods. We recommend the Commission implement better practices for the QASP process that includes additions to the QASP plan or a separate procedure that outlines how the QASP and KPI measurements are developed and the basis for measurements.	10/5/2020	Overdue	PMO	CAP in place
56	Cooperative Agreement Audit	We recommend the Commission to complete a work force analysis to determine staffing requirements based on major mission activities.	9/30/2021	Open	PMO	CAP in place
57	Cooperative Agreement Audit	We recommend the Commission to Ensure the Commission's Agreements are harmonized with compliance enforcement protocol to ensure they are capable of meeting the regulatory requirements of the Agreements by the Commission and CNAs.	9/30/2021	Open	PMO	Implemented
58	Cooperative Agreement Audit	We recommend the Commission review and assess the requirements of the deliverables listed in Section G, attachment 1 of the Agreements, to determine if there are opportunities to reduce the volume and enhance the preparation effectiveness.	10/5/2020	Open	PMO	Implemented
59	Cooperative Agreement Audit	We recommend the Commission to review and analyze the Fee and Expenditure Reports and other materials received from the CNAs for opportunities to use a variety of analytical, research, and evaluation methods to support an informed decision-making process.	10/5/2020	Open	PMO	Implemented

No.	Report Short Name	Recommendation	Est. Comp. Date	Current Status (Per OIG)	Responsible Office ¹	Recommendation Progress (Per Agency)
60	Cooperative Agreement Audit	We recommend the Commission to ensure that responses to follow up questions from CNAs have been addressed and included in the reports prior to sending the Fee and Expenditure Reports to Congress.	10/5/2020	Overdue	PMO	CAP in place
61	Cooperative Agreement Audit	We recommend the Commission to ensure the CNAs have access to clear and complete guidance to follow when responding to Commission requests, enforcing the Commission's regulatory requirements and meeting the requirements of the Agreements.	9/30/2021	Open	PMO	Implemented
62	Audit of Project Assignment and Allocation of Orders	Develop programmatic guidance on the interim pilot test program goals and provide it to the CNAs to help ensure the program achieves its goals, consistent with Standards for Internal Controls in the Federal Government. This includes: a. Clarify its authority for conducting the pilot program to address recent federal court decisions that questioned whether the Commission has this authority. b. Clarifying whether the CNAs need to update their project distribution polices to incorporate the changes for the pilot test program.	9/30/2021	Open	PMO	CAP in place
63	Audit of Project Assignment and Allocation of Orders	Update policy 51.301 to include clarifying the meaning of equitable and transparent distributions, consistent with Standards for Internal Controls in the Federal Government and prior GAO recommendations.	9/30/2021	Open	PMO	CAP in place
64	Audit of Project Assignment and Allocation of Orders	Review and address the outstanding issues identified during the Commission's 2017 review to ensure NIB's project assignment policy aligns with Commission policy 51.301.	9/30/2021	Open	PMO	CAP in place

No.	Report Short Name	Recommendation	Est. Comp. Date	Current Status (Per OIG)	Responsible Office ¹	Recommendation Progress (Per Agency)
65	Audit of Project Assignment and Allocation of Orders	Ensure that NIB completes its order allocation policy and provide sufficient guidance to NIB to ensure that this policy aligns with Commission policy 51.301.	9/30/2021	Open	PMO	CAP in place
66	Audit of Project Assignment and Allocation of Orders	Require the CNAs to include specific criteria for considering the size of NPAs in their recommendation decisions. As part of this, develop metrics for assessing the CNAs on the equitable distribution of projects and monitor progress on an annual basis, consistent with the Standards for Internal Controls in the Federal Government.	9/30/2021	Open	PMO	CAP in place
67	Audit of Project Assignment and Allocation of Orders	Conduct a study to determine whether a different mix of different sized NPAs could help increase the number of people employed through the program and their total work hours.	12/31/2021	Open	PMO	CAP in place
68	Audit of Project Assignment and Allocation of Orders	Identify metrics for assessing transparency and monitor progress on annual basis, consistent with the Standards for Internal Controls in the Federal Government.	9/30/2021	Open	PMO	CAP in place
69	Audit of Procurement List Additions Process	Develop a systematic approach to reviewing and updating policies and procedures every five years as needed in accordance with policy 51.101 including documentation of the review performed, whether updates are needed, and the prioritization of identified updates.	9/30/2021	Open	PMO	CAP in place
70	Audit of Procurement List Additions Process	Update D&F policy 51.207 to improve transparency by clearly stating its use, purpose, and implementation including how D&F authority delegated to designated Commission staff is required to be approved by Commission members, documented, and periodically updated.	12/31/2021	Open	PMO	CAP in place

No.	Report Short Name	Recommendation	Est. Comp. Date	Current Status (Per OIG)	Responsible Office ¹	Recommendation Progress (Per Agency)
71	Audit of Procurement List Additions Process	Review and evaluate the D&F thresholds, and the eight (8) other criteria for assessing whether using D&F approval authority is appropriate, in determining whether the risk tolerance for the volume of D&F approvals is at an acceptable level.	12/31/2021	Open	PMO	CAP in place
72	Audit of Procurement List Additions Process	Monitor the annual use of D&F authority to include restarting the regular reporting to Commission members about the use of this authority.	7/1/2021	Open	PMO	Implemented
73	Audit of Procurement List Additions Process	Develop comprehensive written documentation of the procedures performed by Commission staff for reviewing and evaluating PL additions including the approval process under D&F authority.	7/31/2022	Open	PMO	CAP in place
74	Audit of Procurement List Additions Process	Complete in a timely manner the implementation to update the middleware software to facilitate the upgrades of the outdated vendor software and implement system patches or security updates as warranted.	6/26/2021	Open	PMO	Implemented
75	Audit of Procurement List Additions Process	Update the Commission's contingency plan to include an offsite or alternative recovery location for PLIMS in the event of a natural disaster or catastrophic incident.	9/30/2021	Open	PMO	CAP in place
76	Audit of Procurement List Additions Process	Review existing enhancements to PLIMS and determine any other enhancements needed to improve the PL additions process. The review should include documenting these processes, prioritizing enhancements, and establishing a timeline for implementation.	3/31/2022	Open	PMO	CAP in place
77	Audit of Procurement List Additions Process	Review the process for extracting and tabulating data to assess the CNAs' performance including new PLIMS data fields and standard reports. The review should include documenting these processes,	3/31/2022	Open	PMO	CAP in place

No.	Report Short Name	Recommendation	Est. Comp. Date	Current Status (Per OIG)	Responsible Office ¹	Recommendation Progress (Per Agency)
		prioritizing enhancements, and establishing a timeline for implementation.				
78	Audit of Procurement List Additions Process	Evaluate the security and functionality of PLIMS after enhancements are completed and determine whether the upgraded version of PLIMS addresses the Commission's needs or should be replaced.	9/30/2023	Open	PMO	CAP in place
79	Audit of Procurement List Additions Process	Establish and document a process to ensure final PLIMS data files and other calculations supporting the metrics in assessing and reporting the CNAs' performance on PL additions and other PL transactions are maintained in a centralized location; and all assumptions, adjustments, and decisions made to adjust CNA final metric ratings based on the calculated results are documented.	12/31/2021	Open	PMO	CAP in place
80	Audit of Procurement List Additions Process	Establish and document a process to evaluate the PLIMS information for new metrics prior to including the new metrics in the CNAs' QASPs.	12/31/2021	Open	PMO	CAP in place
81	Audit of Procurement List Additions Process	Identify metrics for assessing the efficiency and effectiveness of the PL additions process and monitor progress on an annual basis. This should include tracking approval rates for PL additions separately as well as end-to-end cycle times for completing a PL addition for products and services under full Commission voting process and D&F authority.	6/30/2022	Open	PMO	CAP in place