November 5, 2021

MEMORANDUM TO:     Joel C. Spangenberg
                   Executive Director of Operations

FROM:              Eric Rivera **/RA/**
                   Acting Assistant Inspector General for Audit

SUBJECT:           AUDIT OF THE DNFSB'S COMPLIANCE UNDER THE
                   DIGITAL ACCOUNTABILITY AND TRANSPARENCY ACT
                   OF 2014(DATA ACT) (DNFSB-22-A-02)

The Office of the Inspector General (OIG) contracted CliftonLarsonAllen (CLA) to
conduct an audit of the DNFSB's Implementation of DATA Act of 2014.  Attached is
CLA's audit report titled *Audit the DNFSB's Compliance Under the Digital
Accountability and Transparency (DATA) Act of 2014*.  The objectives of this audit
were to assess (1) the completeness, accuracy, timeliness, and quality of the
DNFSB's fiscal year (FY) 2020 quarter 4 financial and award data submitted for
publication on USASpending.gov, and (2) the DNFSB's implementation and use of the
Government-wide financial data standards established by the Office of Management
and Budget (OMB), and the U.S. Department of the Treasury.

The findings and conclusions presented in this report are the responsibility of CLA.
The OIG's responsibility is to provide adequate oversight of the contractor's work in
accordance with Generally Accepted Government Auditing Standards.

The report presents the results of the audit.  Following the exit conference, agency staff
indicated that they had formal comments for inclusion in this report.  Appendix 1 of this
report contains the DNFSB's formal comments, and CLA's response to those comments.

CLA found that the DNFSB's FY 2020 quarter 4 submission was not timely, complete,
or accurate.  CLA determined that the quality of the DNFSB's data was of lower quality
overall.  Additionally, CLA found that the DNFSB, for the quarter reviewed, was not in
compliance with Government-wide financial data standards established by the OMB
and the Department of Treasury.

Please provide information on actions taken or planned on each of the recommendation(s) within 30 calendar days of the date of this memorandum.  We appreciate the cooperation extended to us by members of your staff during the audit.  If you have any question or comments about our report, please contact me at (301) 415-5915 or Terri Cooper, Team Leader, at (301) 415-5965.

# Defense Nuclear Facilities Safety Board (DNFSB)

## Performance Audit Report
## The DNFSB's Compliance under the Digital Accountability and Transparency (DATA) Act of 2014

## Fiscal Year 2020, Quarter 4, DATA Act Submission

## Prepared by:
## CliftonLarsonAllen LLP
## 901 North Glebe Road, Suite 200
## Arlington, VA 22203

## October 14, 2021

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**INDEPENDENT AUDITORS' REPORT**

Inspector General
United States Nuclear Regulatory Commission

CliftonLarsonAllen LLP (CLA), an independent certified public accounting firm, was contracted by the United States (U.S.) Nuclear Regulatory Commission Office of the Inspector General (OIG) to conduct a performance audit on the Defense Nuclear Facilities Safety Board's (DNFSB) compliance under the Digital Accountability and Transparency Act (DATA Act). This report represents the results of our performance audit of the DNFSB's compliance under the DATA Act, the objectives of which are to assess (1) the completeness, accuracy, timeliness and quality of DNFSB's fiscal year (FY) 2020 quarter 4 financial and award data submitted for publication on USASpending.gov, and (2) DNFSB's implementation and use of the Government-wide financial data standards established by Office of Management and Budget (OMB) and the U.S. Department of the Treasury (Treasury).

We conducted our performance audit in accordance with auditing standards generally accepted in the United States of America, as applicable to performance audits contained in the *Government Auditing Standards* issued by the Comptroller General of the United States. Those standards require that we plan and perform our audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Our audit found that DNFSB's FY 2020 quarter 4 submission was not timely, complete, or accurate. We determined that the quality of DNFSB's data was of lower quality[1] overall. We also found that DNFSB was not in compliance with Government-wide financial data standards established by OMB and Treasury. DNFSB's FY 2020 quarter 4 DATA Act File D1, *Award and Awardee Attributes for Procurement*, was incorrectly blank.

We provided a discussion draft report to DNFSB on October 21, 2021. An exit conference was held subsequently with DNFSB on October 28, 2021. After reviewing the discussion draft, DNFSB management provided comments that have been incorporated into this report, as appropriate. DNFSB management stated their agreement with the results and recommendations in this report and provided formal comments for inclusion in this report. Additional comments or explanations provided by DNFSB that were included in our audit report were not subjected to our audit procedures, and therefore, we do not provide conclusion on their responses. See Appendix 1, DNFSB's Management Comment. Our work did not include an assessment of the sufficiency of internal control over financial reporting or other matters not specifically outlined in the enclosed

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[1] The IG Guide includes a scorecard spreadsheet that calculates the quality of the data based on the answers to questions and data input by auditors. Quality of data is categorized as lower, moderate, higher, and excellent based on points range. The scorecard is formatted to calculate quality based on weighted scores of both statistical testing and nonstatistical testing results. For the quality scorecard, statistical testing results are valued at 60 points and non-statistical testing results are valued at 40 points, for a total of 100 points.

report. CLA cautions that projecting the results of our performance audit to future periods is subject to the risks that conditions may materially change from their current status. The information included in this report was obtained from DNFSB on or before October 14, 2021. We have no obligation to update our report or to revise the information contained herein to reflect events and transactions occurring subsequent to October 14, 2021.

The purpose of this audit report is to report on DNFSB's FY 2020 quarter 4 financial and award data for publication on USASpending.gov compliance with the DATA Act and is not suitable for any other purpose.

CliftonLarsonAllen LLP

*CliftonLarsonAllen LLP*

Arlington, VA
October 14, 2021

## ABBREVIATIONS AND SHORT REFERENCES

Award ID    Award Identification
CIGIE       Council of the Inspectors General on Integrity and Efficiency
CLA         CliftonLarsonAllen LLP
COVID-19    Coronavirus Disease 2019
DAIMS       DATA Act Information Model Schema
DATA Act    Digital Accountability and Transparency Act of 2014
DE          Data Element
DNFSB       Defense Nuclear Facilities Safety Board
FABS        Financial Assistance Broker Submission
FAEC        Federal Audit Executive Council
FAR         Federal Acquisition Regulation
FFATA       Federal Funding Accountability and Transparency Act of 2006
FPDS-NG Federal Procurement Data System – Next Generation
FSRS        FFATA Subaward Reporting System
FSSP        Federal Shared Service Provider
FY          Fiscal Year
GAO         Government Accountability Office
GTAS        Government-wide Treasury Account Symbol
IDD         Interface Definition Document
IG          Inspector General
OIG         Office of the Inspector General
OMB         Office of Management and Budget
PFS         Pegasys Financial Group
PIID        Procurement Instrument Identifier Number
RSS         Reporting Submission Specification
SAM         System for Award Management
SAO         Senior Accountable Official
SOC         Service Organization Controls
TAS         Treasury Account Symbol
Treasury    Department of the Treasury
U.S.        United States
USDA        U.S. Department of Agriculture
Working Group FAEC DATA Act Working Group

## I.    OBJECTIVES

The objectives of our performance audit were to assess the:

(1) completeness, accuracy, timeliness, and quality of the FY 2020 quarter 4 financial and award data submitted by DNFSB for publication on USASpending.gov, and
(2) DNFSB's implementation and use of the Government-wide financial data standards established by the OMB and the Treasury.

## II.    BACKGROUND

The DATA Act requires Federal agencies to report financial and award data in accordance with the established Government-wide financial data standards. In May 2015, the OMB and Treasury published 57 data definition standards (commonly referred to as data elements or DEs) and required Federal agencies to report financial and award data in accordance with these standards for DATA Act reporting starting in January 2017. Subsequently, and in accordance with the DATA Act, Treasury began displaying Federal agencies' data on USASpending.gov for taxpayers and policy makers in May 2017.

In April 2020, OMB issued M-20-21, *Implementation Guidance for Supplemental Funding Provided in Response to the Coronavirus Disease (COVID-19)*, which made changes to DATA Act reporting. Agencies that received COVID-19 supplemental relief funding must submit DATA Act files A, B, and C on a monthly basis starting with the June 2020 reporting period. These monthly submissions must also include a running total of outlays for each award in File C funded with COVID-19 supplemental relief funds.

The DATA Act also requires the Inspector General (IG) of each Federal agency to audit a statistically valid sample (for non-covid obligations) and non-statistically valid sample (for COVID outlays) of the spending data submitted by its Federal agency and to submit to Congress a publicly available report assessing the completeness, accuracy, timeliness, and quality of the data sampled, and the implementation and use of the Government-wide financial data standards by the Federal agency. DNFSB did not receive COVID-19 funding. Therefore, COVID-19 outlay testing was not applicable.

The Council of the Inspectors General on Integrity and Efficiency (CIGIE) identified a timing anomaly with the oversight requirement contained in the DATA Act. That is, the first IG reports were due to Congress in November 2016; however, Federal agencies were not required to report spending data until May 2017. To address this reporting date anomaly, the IGs provided Congress with their first required reports by November 8, 2017, one year after the statutory due date, with two subsequent reports to be submitted following on a 2-year cycle. On December 22, 2015, CIGIE's chair issued a letter detailing the strategy for dealing with the IG reporting date anomaly and communicated the strategy to the Senate Committee on Homeland Security and Governmental Affairs and the House Committee on Oversight and Government Reform. The CIGIE's date anomaly letter memorializing this strategy can be found in Appendix VIII.

Following the results of the 2017 and 2019 audits, the CIGIE Federal Audit Executive Council (FAEC) Working Group compiled a listing of lessons learned and incorporated this feedback into the *CIGIE FAEC Inspectors General Guide to Compliance under the DATA Act,* referred to as the IG Guide. In consultation with the Government Accountability Office (GAO), as required by the DATA Act, the Working Group developed the IG Guide to set a baseline framework for the required reviews performed by the IG community and to foster a common methodology for performing these mandates. The IG Guide was updated for the third required report, due November 8, 2021, based on feedback from the IG community, GAO, and other stakeholders.

DNFSB contracts through an interagency agreement with the U.S. Department of Agriculture (USDA), Pegasys Financial Group (PFS), a federal shared service provider (FSSP), for its financial management services. Those services consist of financial management systems services, financial management reporting and accounting support, optional financial management services, budgeting and analysis support, travel system operations services, and other service. Included in the FSSP's scope of services is DATA Act preparation support. Although the FSSP performs specific DATA Act financial reporting duties, DNFSB is primarily responsible to ensure that the integrity and quality of the data reported is complete, accurate and timely.

## III.    ANALYSIS OF RESULTS AND QUALITY ASSESSMENT

Our audit found that DNFSB's FY 2020 quarter 4 submission was not timely, complete, or accurate. We determined that the quality of DNFSB's data was of lower quality[2] overall. In addition, DNFSB was not in compliance with Government-wide financial data standards established by OMB and Treasury. DNFSB's FY 2020 quarter 4 DATA Act File D1 was incorrectly blank.

### III.1  NON-STATISTICAL RESULTS

#### A.  Timeliness of the Agency Submission
We evaluated DNFSB's DATA Act submission to Treasury DATA Act Broker and determined that the submission was not timely. We verified that DNFSB's Senior Accountable Official (SAO) certified its submission in the Treasury DATA Act Broker on May 17, 2021, which was six months after the November 16, 2020 submission due date.

#### B.  Completeness of Summary-Level Data for Files A and B
We performed reconciliation of summary-level data and linkages for Files A and B. We found the total dollar amounts in File A and B were not equal. CLA identified a difference between obligations of $4 million, gross outlays of $4.4 million and deobligations of $400 thousand.

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[2] The IG Guide includes a scorecard spreadsheet that calculates the quality of the data based on the answers to questions and data input by auditors. Quality of data is categorized as lower, moderate, higher, and excellent based on points range. The scorecard is formatted to calculate quality based on weighted scores of both statistical sampling and nonstatistical testing results. For the quality scorecard, statistical testing results are valued at 60 points and non-statistical testing results are valued at 40 points, for a total of 100 points. Testing of File C and D1 data elements, linkages between File C and D1 and other evaluation criteria were reflected in the DNFSB FY 2020 quarter 3 scorecard. Since File D1 was blank all data elements related to File D1 testing were considered exceptions.

Completeness of the agency submission is defined as transactions and events that should have been recorded are recorded in the proper period.

Per DNFSB, due to high staff turnover and limited staff, reconciling items between File A and B were not research and resolved on a timely basis

To assess the completeness of File A, we verified that File A included all Treasury Account Symbols (TAS) from which funds were obligated as reflected in the Government-wide TAS (GTAS) SF-133. All summary-level data from File A matched the GTAS SF-133 data elements within an immaterial difference.

To assess the completeness of File B, we compared the data in File B to the TASs listed in File A and verified that all TASs in File A are accounted for in File B without error. We found that the total dollar amounts in File A and B were not equal as described above. We noted all object class codes from File B match the codes defined in Section 83 of OMB Circular A-11.[3]

### C. Suitability of File C for Sample Selection

File C links to File B through the TAS, object class, and program activity data elements. We assessed this linkage by tracing these elements from File C to File B to ensure they exist in File B. We found that File C was complete and was suitable for sampling.

### D. Record-Level Linkages for Files C and D1/D2

We assessed the linkage between File C and File D1 to ensure that all Award Identification (Award ID) Numbers that exist in File C, exist in File D1 and vice-versa. We found there was no data in file D1. Per DNFSB, File D1 was incorrectly blank due to DNFSB not having an account login to submit data to populate File D1. Additionally, DNFSB did not have a process in place at the time to ensure contracts awarded and input into FPDS-NG had the correct Procurement Instrument Identifier Number (PIID). Since the beginning of FY 2021, DNFSB has been coordinating to establish a process.

DNFSB did not have financial assistance awards and therefore, there were no Award IDs in File D2.

### E. COVID-19 Outlay Testing and Results - Not Applicable to DNFSB

DNFSB did not receive COVID-19 funding. Therefore, COVID-19 outlay testing was not applicable.

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[3] OMB A-11, Preparation, Submission, and Execution of the Budget (July 1, 2016); Section 83 of OMB A-11 can be found at https://obamawhitehouse.archives.gov/sites/default/files/omb/assets/a11_current_year/s83.pdf

## III.2 STATISTICAL RESULTS

**Data Element (DE) Analysis**

We selected a sample of 33 records from the population in File C and tested 1,551 data elements for completeness, accuracy, and timeliness. DNFSB did not have financial assistance awards. See Appendix V Scope and Methodology for description of the sampling methodology. The test results are consistent with the risks identified in the agency's data quality plan. The summary result of PIID testing is shown in Table 1:

| Sample Record # | Total # DEs | # Incomplete | | # Inaccurate | | # Untimely | |
|---|---|---|---|---|---|---|---|
| 1 | 47 | 41 | 87.23% | 41 | 87.23% | 47 | 100.00% |
| 2 | 47 | 41 | 87.23% | 41 | 87.23% | 47 | 100.00% |
| 3 | 47 | 41 | 87.23% | 41 | 87.23% | 47 | 100.00% |
| 4 | 47 | 41 | 87.23% | 41 | 87.23% | 47 | 100.00% |
| 5 | 47 | 41 | 87.23% | 41 | 87.23% | 47 | 100.00% |
| 6 | 47 | 41 | 87.23% | 41 | 87.23% | 47 | 100.00% |
| 7 | 47 | 41 | 87.23% | 41 | 87.23% | 47 | 100.00% |
| 8 | 47 | 41 | 87.23% | 41 | 87.23% | 47 | 100.00% |
| 9 | 47 | 41 | 87.23% | 41 | 87.23% | 47 | 100.00% |
| 10 | 47 | 42 | 89.36% | 42 | 89.36% | 47 | 100.00% |
| 11 | 47 | 41 | 87.23% | 41 | 87.23% | 47 | 100.00% |
| 12 | 47 | 41 | 87.23% | 41 | 87.23% | 47 | 100.00% |
| 13 | 47 | 41 | 87.23% | 41 | 87.23% | 47 | 100.00% |
| 14 | 47 | 41 | 87.23% | 41 | 87.23% | 47 | 100.00% |
| 15 | 47 | 41 | 87.23% | 41 | 87.23% | 47 | 100.00% |
| 16 | 47 | 41 | 87.23% | 41 | 87.23% | 47 | 100.00% |
| 17 | 47 | 41 | 87.23% | 41 | 87.23% | 47 | 100.00% |
| 18 | 47 | 41 | 87.23% | 41 | 87.23% | 47 | 100.00% |
| 19 | 47 | 41 | 87.23% | 41 | 87.23% | 47 | 100.00% |
| 20 | 47 | 41 | 87.23% | 41 | 87.23% | 47 | 100.00% |
| 21 | 47 | 41 | 87.23% | 41 | 87.23% | 47 | 100.00% |
| 22 | 47 | 41 | 87.23% | 41 | 87.23% | 47 | 100.00% |
| 23 | 47 | 41 | 87.23% | 41 | 87.23% | 47 | 100.00% |
| 24 | 47 | 41 | 87.23% | 41 | 87.23% | 47 | 100.00% |
| 25 | 47 | 41 | 87.23% | 41 | 87.23% | 47 | 100.00% |
| 26 | 47 | 41 | 87.23% | 41 | 87.23% | 47 | 100.00% |
| 27 | 47 | 41 | 87.23% | 41 | 87.23% | 47 | 100.00% |
| 28 | 47 | 41 | 87.23% | 41 | 87.23% | 47 | 100.00% |
| 29 | 47 | 41 | 87.23% | 41 | 87.23% | 47 | 100.00% |
| 30 | 47 | 42 | 89.36% | 42 | 89.36% | 47 | 100.00% |
| 31 | 47 | 41 | 87.23% | 41 | 87.23% | 47 | 100.00% |

| Sample Record # | Total # DEs | # Incomplete | | # Inaccurate | | # Untimely | |
|---|---|---|---|---|---|---|---|
| 32 | 47 | 41 | 87.23% | 41 | 87.23% | 47 | 100.00% |
| 33 | 47 | 41 | 87.23% | 41 | 87.23% | 47 | 100.00% |
| Total DEs Tested | 1551 | | | | | | |
| Total Errors | | 1355 | | 1355 | | 1551 | |
| Error Rate | | 87.36% | | 87.36% | | 100.00% | |

**Table 1: Summary Results of PIID Testing for Completeness, Accuracy, Timeliness**

See Appendix II for the DNFSB's Results of the Data Element Test.

Completeness – Actual Error Rate
The actual error rate for the completeness of the data elements tested is 87.36%[4]. A data element was considered complete if the required data element that should have been reported was reported.

Accuracy – Actual Error Rate
The actual error rate for the accuracy of the data elements tested is 87.36%[5]. A data element was considered accurate when amounts and other data relating to recorded transactions were recorded in accordance with the DATA Act Information Model Schema (DAIMS), Reporting Submission Specification (RSS), Interface Definition Document (IDD), and the online data dictionary, and agree with the originating award documentation/contract file. See Description of Errors below for description of root cause of the error.

Timeliness – Actual Error Rate
The actual error rate for the timeliness of the data elements tested is 100%[6]. timeliness of data elements was based on the reporting schedules defined by the financial, procurement, and financial assistance requirements (Federal Funding Accountability and Transparency Act (FFATA), Federal Acquisition Regulation (FAR), Federal Procurement DATA System - Next Generation (FPDS-NG), Financial Assistance Broker Submission (FABS), and DAIMS).

Descriptions of Errors
The following errors were identified during the test of the detailed record-level data elements.

**Exception #1: There were no records in File D1**

DNFSB did not submit data to the DATA Broker system that was necessary to generate File D1. Per DNFSB, due to high turnover and limited staff, DNFSB did not have a login account to populate

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[4] Based on a 95% (exact) confidence level, the confidence interval is between 85.6%-89.0%.
[5] Based on a 95% (exact) confidence level, the confidence interval is between 85.6%-89.0%.
[6] Based on a 95% (exact) confidence level, the confidence interval is between 93.1%-100.0%.

File D1. Additionally, DNFSB did not have a process in place at the time to ensure contracts awarded and input into FPDS-NG had the correct PIID. DNFSB management explained that since the beginning of FY 2021, DNFSB coordinated and finalized a process with their FSSP to ensure timely submission of information for files, including information used to populate File D1, and has a process in place to ensure contracts awarded and input into FPDS-NG have the correct PIID.

**Exception #2: For two (2) PIIDs, the Object Classes reported in File C were not reported on the contracts.**

DNFSB will work to endure Object Class Code is consistently documented on the contract.

Analysis of the Accuracy of the Dollar Value-Related Data Elements
File D1 was incorrectly blank when procurement award detailed information should have been reported. See Error 1.

Analysis of Errors in Data Elements Not Attributable to DNFSB
All errors were attributed to DNFSB.

### III.3  OVERALL DETERMINATION OF QUALITY

Based on the results of our statistical and non-statistical testing, DNFSB scored 24.17 points, which is a quality rating of lower quality. The quality of the data elements was determined using the midpoint of the range of the proportion of errors (error rate) for completeness, accuracy, and timeliness. The highest of the three error rates was used as the determining factor of quality. Table 3 provides the range in determining the quality of the data elements.

| Quality Level | | |
|---|---|---|
| **Range** | | **Level** |
| 0 | 69.999 | Lower |
| 70 | 84.999 | Moderate |
| 85 | 94.999 | Higher |
| 95 | 100 | Excellent |

**Table 3: Range of Quality Level[7]**

### III.4  IMPLEMENTATION AND USE OF THE DATA STANDARDS

DNFSB is not incompliance with government-wide financial standards for spending information as developed by OMB and Treasury.  DNFSB' File D1 for FY 2020 quarter 4 was incorrectly blank.

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[7] Source of table 3 and quality rating determination is the IG Guide, Section 820, Quality Assessment - Scorecard

**III.5 ASSESSMENT OF INTERNAL CONTROLS**

Assessment of Internal Control over Source Systems

The DNFSB uses USDA as its FSSP and USDA's Pegasys system for its financial management processes including reporting. This system is the source of information used to report theFY 2021 quarter 4 financial data as required by the DATA Act.

In performing DNFSB's FY 2020 financial statement audit, CLA assessed the internal controls over the Pegasys and determined that the controls are properly designed, implemented, and operating effectively. Our assessment included the review of Pegasys Service Organization Controls (SOC) 1, Type 2 report. A SOC 1, Type 2 Report is intended to meet the needs of a broad range of users that need detailed information and assurance about the controls at a service organization relevant to security, availability, and processing integrity of the systems the service organization uses to process users' data; and the confidentiality and privacy of the information processed by these systems. We relied on this assessment of internal controls over source systems for the DATA Act.

Assessment of Internal Control over the Data Management and Processes (DATA Act Submission)

Through review of DNFSB's DATA Act process narratives and discussions with management, CLA obtained an understanding of DNFSB's processes for reconciling data variances, identifying root causes of errors, and certifying the data submitted to the DATA Act broker.

CLA obtained read-only access to the Treasury's DATA Act Broker submission portal for purposes of reviewing DNFSB's Files A-D for FY 2020 quarter 4 DATA Act submission. Additionally, DNFSB provided their final Broker warnings for the same period. We reviewed DNFSB's final Broker warnings files they reviewed to evaluate DNFSB's performance of internal control over the data quality, accuracy, timeliness, and completeness prior to the final data certification. Per DNFSB they reviewed the warning reports but did not make any corrections to resolve the warning for FY 2020 quarter 4. Furthermore, CLA did not receive any evidence that DNFSB reconciled the data files. Per DNFSB, data file reconciliations and resolution of warnings were not done for the FY 2020 DATA Act submission due to staff turnover and limited staff.

We assessed internal controls and compliance with laws and regulations necessary to satisfy the audit objective. In particular, we assessed whether DNFSB has sufficient controls in place to ensure that the FY 2020 quarter 4 DATA Act submission was complete, accurate and timely in accordance with applicable OMB and Treasury guidance. We found that DNFSB was not in compliance with DATA Act reporting deadlines and the FY 2020 quarter 4 DATA Act submission was incomplete as File D1 was blank. While DNFSB has documented control procedures to ensure DATA Act submission are complete, accurate and timely DNFSB did not perform key control procedures such as documenting a reconciliation between files and resolving significant warnings before SAO certification.

Our review was limited to these internal controls relevant to our performance objectives and will not disclosed all internal control deficiencies that may have existed at the time of this audit.

## III.6  RECOMMENDATIONS

We recommend that DNFSB:

1) Enhance internal control and detective procedures surrounding DATA Act submissions. Procedures should include documenting reconciliations between DATA Files A, B, C, and D1, researching and resolving differences between files including resolving warning reports on a timely basis, and submitting DATA Act information timely to the DATA Act Broker in accordance with the reporting schedule established by the Treasury DATA Act Program Management Office. (Partial repeat of 2019 DATA Act audit report recommendation two)
2) Ensure Object Class Code is consistently documented on the contract.

Additionally, see 2019 recommendations and status based on the FY 2020 quarter 3 testing in Appendix IV.

# IV.    REPORT  DISTRIBUTION

**DNFSB Distribution**
Office of the General Manager
Office of the Chief Finance Officer
Office of the General Counsel

**Non-DNFSB Distribution**
United States Senate Committee on Homeland Security and Governmental Affairs
The Honorable Gary C. Peters, Chairman
The Honorable Robert J. Portman, Ranking Member

United States House Committee on Oversight and Reform
The Honorable Carolyn B. Maloney, Chairwoman
The Honorable, James R. Comer, Ranking Member

United States Senate Committee on the Budget
The Honorable Bernard Sanders, Chairman
The Honorable Lindsey O. Graham, Ranking Member

United States House Committee on the Budget
The Honorable John A. Yarmuth, Chairman
The Honorable Jason T. Smith, Ranking Member

United States Senate Committee on Finance
The Honorable Ronald Lee Wyden, Chairman
The Honorable Michael D. Crapo, Ranking Member

United States House Committee on Financial Services
The Honorable Maxine Waters, Chairman
The Honorable Patrick T. McHenry, Ranking Member

GAO - Report electronically submitted to DATAActImplementation@gao.gov
Treasury OIG - Report electronically submitted to DATAAct@oig.treas.gov

# APPENDICES

## APPENDIX I – DNFSB's MANAGEMENT COMMENT AND CLA'S RESPONSE

### DEFENSE NUCLEAR FACILITIES
### SAFETY BOARD
Washington, DC 20004-2901

### DNFSB COMMENTS ON THE DIGITAL ACCOUNTABILITY AND TRANSPARENCY ACT AUDIT

### OCTOBER 2021

The Nuclear Regulatory Commission's Office of the Inspector General (OIG) provides inspector general services to the Defense Nuclear Facilities Safety Board (DNFSB). The OIG contracted an accounting firm to conduct its third required review of the DNFSB's compliance with Government-wide financial data standards as required by the DATA Act. Despite being a small independent agency, the DNFSB is required to meet the same financial data standards as much larger agencies. For this particular review, the accounting firm chose the 4th Quarter of Fiscal Year (FY) 2020 for its data sample. At that time, the DNFSB was substantially understaffed across the agency including in key positions necessary to comply with the Government-wide financial data standards. Key positions such as a Principal Accountant, a Chief Financial Officer, Contracting Officers, and a Director of Operational Services were all vacant. As a result, DNFSB's FY 2020 4th Quarter reporting was not timely, accurate, or complete as described in the DATA Act audit report. With the support of Congress requiring a minimum level of Federal staff and turnover in agency leadership, a renewed focus on rebuilding agency staff led to DNFSB onboarding the key personnel in Quarter 1 and Quarter 2 of FY 2021. Since that time, DNFSB has made significant progress in ensuring timely completion and certification of the monthly DATA Act files. The agency cleared the backlog of DATA Act files, established ongoing working group sessions with USDA, continues to perform root cause analysis of its file warnings, and now publishes its monthly submission files on a timely basis. As a result of these actions, the following improvements have been made in DATA Act reporting and compliance for FY 2021:

- Number of total monthly DATA Act Warnings decreased from an average of 70 a month down to 36 for the September submission;
- Number of total unique warning types decreased from 14 down to 9; and
- DNFSB continues to work closely with USDA, its Federal Shared Service Provider to identify root causes and implement solutions.

The DATA Act audit report describes concerns regarding the completeness and accuracy of financial data submitted to the Treasury DATA Act Broker. There were differences between File A and File B with regard to Obligations, Outlays, De-obligations, and Recoveries in the amount of $4 million. DNFSB has identified the root cause as prior period worksheet adjustments, and their subsequent reversals. The worksheet adjustments were accurately reflected in the File A submission file but were not accurately reflected in the File B submission file. As a result, the File A figures were accurate and tied back to the SF-133 form for the reporting period. Overall, DNFSB activities were accurately reported in File A, and the $4 million dollar difference was due to an accounting adjustment made by USDA. The DNFSB also failed to enter any contracting data into file D1 for the 4th Quarter of FY 2020. With experienced and trained contract officers now onboard, the agency is properly populating the system with contracting data.

DNFSB is fully committed to build upon the improvements made in FY 2021 for compliance with the DATA Act and strengthening its key internal controls for reconciliation of the DATA Act submission files and timely identification, review, and resolution of warning notifications when possible. This DATA Act audit reveals two important lessons for DNFSB: 1) that as a small agency, the agency is one-person deep for important administrative functions, and 2) that manual accounting and reconciliation of financial data increases the potential for errors that are time consuming to resolve. In part to address these concerns, the agency will be initiating a comprehensive human capital strategy plan in FY 2022. Although this strategic effort is not intended to increase the size of the operational support staff in the agency, it will allow for better personnel development, training, and succession planning. In FY 2022, the agency also intends to conduct market research and select an enterprise financial accounting system to automate budget formulation, budget execution, and financial accounting processes. A complimentary software suite of tools to assist in the contracting process will facilitate the agency contracting processes and contract tracking. These combined efforts will institutionalize financial controls and automate processes currently completed manually, thereby reducing financial control risks and resolving issues identified though OIG audits. The support of Congress and DNFSB leadership has been crucial in planning for these enhancements.


James P. Biggins
General Manager
Defense Nuclear Facilities Safety Board

**Comments on OIG Discussion Draft Report:[8]**
**Audit of the DNFSB's Compliance with the Digital Accountability and Transparency Act of 2014 (DATA Act)**
October 2021

| No. | Page | Reviewer | Comment | Rationale | CLA 's Response |
|---|---|---|---|---|---|
| **1.** | Page7, section III | DBF | ANALYSIS OF RESULTS AND QUALITY ASSESSMENT | The auditors' draft report states, "*We determined that the quality of DNFSB's data was of lower quality overall",* with a reference to a footnote stating, *"The IG Guide includes a scorecard spreadsheet that calculates the quality of the data based on the answers to questions and data input by auditors. Quality of data is categorized as low, moderate, higher, and excellent based on points range. The scorecard is formatted to calculate quality based on weighted scores of both statistical sampling and nonstatistical testing results. For the quality scorecard, statistical testing results are valued at 60 points and non-statistical testing results are valued at 40 points, for a total of 100 points*."<br><br>Based on the draft report, the scoring was based on review of the D1 file, which was blank, due to various reasons previously mentioned above. It is unclear how scoring was performed against a blank entry where data was not provided.<br><br>Accordingly, the scoring criteria should be updated to specify the reason for incompleteness and/or inaccuracy be identified as being specifically related to D1 files, and not any other file, since these should have been marked as 'N/A' due to there being no data in the D1 file for most of the submissions. | As noted in footnote 2 of the report, the scoring was based on testing of File C and D1 data elements, the linkages between File C and D1, and other evaluation criteria reflected in the CIGIE IG Guide's quality assessment scorecard for FY 2020 quarter 3 testing period. Since File D1 was blank all data elements related to File D1 testing were considered exceptions. Section III mentions the reasons for the lower scoring and results of tests. |

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[8] The column CLA's Response is added by CLA to respond to the Comment/Rationale provided by DNFSB in their comment to the draft report. The other columns were provided by DNFSB verbatim.

| No. | Page | Reviewer | Comment | Rationale | CLA's Response |
|---|---|---|---|---|---|
| 2. | Page 5 | DBF | Section B. Completeness of Summary-Level Data for Files A and B | Regarding the statement, "*Per DNFSB they are in the process of researching the reason for the differences. Completeness of the agency submission is defined as transactions and events that should have been recorded are recorded in the proper period.*"<br><br>Please update to, "DNFSB researched the differences and provided explanations that they were due to differences between File A and File B with regard to Obligations, Outlays and De-obligations and Recoveries. The root cause was related to prior period worksheet adjustments, and their subsequent reversals. The worksheet adjustments were accurately reflected in the File A submission file, but were not accurately reflected in the File B submission file. As a result, the File A figures were accurate and tied back to the SF-133 for the reporting period. Overall, DNFSB activities were accurately reported in File A, and the $4 Million dollar difference was due to an accounting adjustment made by USDA." | During our audit and when the draft report was prepared in October 2021, DNFSB could not provide the status and was still researching the reason for the $4 million differences between File A and B related to obligations and outlays, although this was in broker warning report since FY 2020 quarter 3 submission. CLA only obtained the root cause of the difference in their response to the draft report. This issue is related to linkages between File A and B, and not file A and SF-133. Report Section III.1B mentions File A agrees to the SF-133. |
| 3. | Page 8 | DBF | Exception 1 | Regarding Exception 1, "Since the beginning of FY 2021, DNFSB has been coordinating with the FSSP to finalize the implementation of the process."<br><br>Please update the above statement to read, "Since the beginning of FY 2021, DNFSB coordinated and finalized a process with their FSSP to ensure timely submission of information for files, including for File D1, and has a process in place to ensure contracts awarded and input into FPDS-NG have the correct PIID." | CLA has updated our audit report to incorporate DNFSB's proposed verbiage. |

## APPENDIX II – DNFSB's RESULTS OF THE DATA ELEMENTS TEST

DNFSB results of the data elements test listed in descending order by accuracy error rate percentage.

| File | Data Element Number | Data Element Name | Error Rate | | |
|------|---------------------|-------------------|------|------|------|
| | | | A | C | T |
| D1 | DE 26 | Period of Performance Start Date | 100% | 100% | 100% |
| D1 | DE 5 | Legal Entity Address | 100% | 100% | 100% |
| D1 | DE 4 | Ultimate Parent Legal Entity Name | 100% | 100% | 100% |
| D1 | DE 17 | NAICS Code | 100% | 100% | 100% |
| D1 | DE 18 | NAICS Description | 100% | 100% | 100% |
| D1 | DE 6 | Legal Entity Congressional District | 100% | 100% | 100% |
| D1 | DE 3 | Ultimate Parent Unique Identifier | 100% | 100% | 100% |
| D1 | DE 1 | Awardee/Recipient Legal Entity Name | 100% | 100% | 100% |
| D1 | DE 2 | Awardee/Recipient Unique Identifier | 100% | 100% | 100% |
| D1 | DE 24 | Parent Award ID Number | 100% | 100% | 100% |
| D1 | DE 30 | Primary Place of Performance Address | 100% | 100% | 100% |
| D1 | DE 31 | Primary Place of Performance Congressional District | 100% | 100% | 100% |
| D1 | DE 14 | Current Total Value of Award | 100% | 100% | 100% |
| D1 | DE 15 | Potential Total Value of Award | 100% | 100% | 100% |
| D1 | DE 11 | Federal Action Obligation | 100% | 100% | 100% |
| D1 | DE 16 | Award Type | 100% | 100% | 100% |
| D1 | DE 22 | Award Description | 100% | 100% | 100% |
| D1 | DE 23 | Award Modification / Amendment Number | 100% | 100% | 100% |
| D1 | DE 25 | Action Date | 100% | 100% | 100% |
| D1 | DE 28 | Period of Performance Potential End Date | 100% | 100% | 100% |
| D1 | DE 29 | Ordering Period End Date | 100% | 100% | 100% |
| D1 | DE 32 | Primary Place of Performance Country Code | 100% | 100% | 100% |
| D1 | DE 33 | Primary Place of Performance Country Name | 100% | 100% | 100% |
| D1 | DE 34 | Award ID Number | 100% | 100% | 100% |
| D1 | DE 36 | Action Type | 100% | 100% | 100% |
| D1 | DE 38 | Funding Agency Name | 100% | 100% | 100% |
| D1 | DE 39 | Funding Agency Code | 100% | 100% | 100% |
| D1 | DE 40 | Funding Sub Tier Agency Name | 100% | 100% | 100% |
| D1 | DE 41 | Funding Sub Tier Agency Code | 100% | 100% | 100% |
| D1 | DE 42 | Funding Office Name | 100% | 100% | 100% |
| D1 | DE 43 | Funding Office Code | 100% | 100% | 100% |
| D1 | DE 44 | Awarding Agency Name | 100% | 100% | 100% |
| D1 | DE 45 | Awarding Agency Code | 100% | 100% | 100% |
| D1 | DE 46 | Awarding Sub Tier Agency Name | 100% | 100% | 100% |

| File | Data Element Number | Data Element Name | Error Rate | | |
|---|---|---|---|---|---|
| | | | A | C | T |
| D1 | DE 47 | Awarding Sub Tier Agency Code | 100% | 100% | 100% |
| D1 | DE 48 | Awarding Office Name | 100% | 100% | 100% |
| D1 | DE 49 | Awarding Office Code | 100% | 100% | 100% |
| D1 | DE 7 | Legal Entity Country Code | 100% | 100% | 100% |
| D1 | DE 8 | Legal Entity Country Name | 100% | 100% | 100% |
| D1 | DE 27 | Period of Performance Current End Date | 100% | 100% | 100% |
| D1 | DE 163 | National Interest Action | 100% | 100% | 100% |
| C | DE 50 | Object Class | 6% | 6% | 100% |
| C | DE 53 | Obligation | 0% | 0% | 100% |
| C | DE 430 | Disaster Emergency Code | 0% | 0% | 100% |
| C | DE 34 | Award ID Number (PIID) | 0% | 0% | 100% |
| C | DE 51 | Appropriations Account | 0% | 0% | 100% |
| C | DE 56 | Program Activity | 0% | 0% | 100% |
| C | DE 24 | Parent Award ID Number | 0% | 0% | 0% |

## APPENDIX III – COMPARATIVE RESULTS

| File | Data Element Number | Data Element Name | Error Rate 2021 | 2019 | % Change |
|------|------|------|------|------|------|
| D1 | DE 163 | National Interest Action | 100% | 0% | 100% |
| D1 | DE 17 | NAICS Code | 100% | 35% | 65% |
| D1 | DE 18 | NAICS Description | 100% | 35% | 65% |
| D1 | DE 6 | Legal Entity Congressional District | 100% | 35% | 65% |
| D1 | DE 1 | Awardee/Recipient Legal Entity Name | 100% | 35% | 65% |
| D1 | DE 2 | Awardee/Recipient Unique Identifier | 100% | 35% | 65% |
| D1 | DE 24 | Parent Award ID Number | 100% | 35% | 65% |
| D1 | DE 30 | Primary Place of Performance Address | 100% | 35% | 65% |
| D1 | DE 31 | Primary Place of Performance Congressional District | 100% | 35% | 65% |
| D1 | DE 11 | Federal Action Obligation | 100% | 35% | 65% |
| D1 | DE 16 | Award Type | 100% | 35% | 65% |
| D1 | DE 22 | Award Description | 100% | 35% | 65% |
| D1 | DE 23 | Award Modification / Amendment Number | 100% | 35% | 65% |
| D1 | DE 29 | Ordering Period End Date | 100% | 35% | 65% |
| D1 | DE 32 | Primary Place of Performance Country Code | 100% | 35% | 65% |
| D1 | DE 33 | Primary Place of Performance Country Name | 100% | 35% | 65% |
| D1 | DE 34 | Award ID Number | 100% | 35% | 65% |
| D1 | DE 36 | Action Type | 100% | 35% | 65% |
| D1 | DE 38 | Funding Agency Name | 100% | 35% | 65% |
| D1 | DE 39 | Funding Agency Code | 100% | 35% | 65% |
| D1 | DE 40 | Funding Sub Tier Agency Name | 100% | 35% | 65% |
| D1 | DE 41 | Funding Sub Tier Agency Code | 100% | 35% | 65% |
| D1 | DE 42 | Funding Office Name | 100% | 35% | 65% |
| D1 | DE 43 | Funding Office Code | 100% | 35% | 65% |
| D1 | DE 44 | Awarding Agency Name | 100% | 35% | 65% |
| D1 | DE 45 | Awarding Agency Code | 100% | 35% | 65% |
| D1 | DE 46 | Awarding Sub Tier Agency Name | 100% | 35% | 65% |
| D1 | DE 47 | Awarding Sub Tier Agency Code | 100% | 35% | 65% |
| D1 | DE 48 | Awarding Office  Name | 100% | 35% | 65% |
| D1 | DE 49 | Awarding Office Code | 100% | 35% | 65% |
| D1 | DE 7 | Legal Entity Country Code | 100% | 35% | 65% |
| D1 | DE 8 | Legal Entity Country Name | 100% | 35% | 65% |
| D1 | DE 5 | Legal Entity Address | 100% | 41% | 59% |
| D1 | DE 4 | Ultimate Parent Legal Entity Name | 100% | 41% | 59% |
| D1 | DE 3 | Ultimate Parent Unique Identifier | 100% | 41% | 59% |
| D1 | DE 25 | Action Date | 100% | 41% | 59% |
| D1 | DE 28 | Period of Performance Potential End Date | 100% | 41% | 59% |

| File | Data Element Number | Data Element Name | Error Rate 2021 | 2019 | % Change |
|------|------|------|------|------|------|
| D1 | DE 27 | Period of Performance Current End Date | 100% | 41% | 59% |
| D1 | DE 14 | Current Total Value of Award | 100% | 47% | 53% |
| D1 | DE 15 | Potential Total Value of Award | 100% | 47% | 53% |
| D1 | DE 26 | Period of Performance Start Date | 100% | 53% | 47% |
| C | DE 50 | Object Class | 37% | 0% | 37% |
| C | DE 430 | Disaster Emergency Code | 33% | 0% | 33% |
| C | DE 34 | Award ID Number (PIID) | 33% | 0% | 33% |
| C | DE 51 | Appropriations Account | 33% | 0% | 33% |
| C | DE 56 | Program Activity | 33% | 0% | 33% |
| C | DE 53 | Obligation | 33% | 24% | 9% |
| C | DE 24 | Parent Award ID Number | 0% | 47% | -47% |

# APPENDIX IV – STATUS OF FISCAL YEAR 2019 DATA ACT RECOMMENDATIONS

We reviewed FY 2019 recommendations to evaluate DNFSB's implementation of the corrective actions. DNFSB has implemented the recommendations made in FY 2019 Data Act report; however, as shown in the errors we noted in the 2021 testing, additional corrective actions are still needed.

| FY 2019 Recommendation | Corrective Action | Status of Recommendation |
|---|---|---|
| 1. Work with its FSSP to correct the PIIDs for new obligations in its accounting system and to correct the mapping of certain data elements to ensure that the data elements are in accordance with the data standards established by OMB and the Treasury | Per DNFSB, DNFSB is currently working with their Federal Shared Service Provider (FSSP) to correct the PIIDs and mapping of data elements. DNFSB implementation of this recommendation is still in progress, with a tentative completion date of quarter 1, FY 2022. | Open |
| 2. Perform an effective quality control review of the data and linkages in the files received from the FSSP aimed at identifying root causes to warnings and errors, if any, prior to the SAO certification | In April 2020, the OIG closed this recommendation as DNFSB's corrective action was implemented based on documentation at the time. Although DNFSB reviewed and researched discrepancies that appeared on the warning reports for quarter 4 FY 2020, reconciliations between Files A to D1 were not documented. CLA noted a $4 million difference for obligations and outlays between File A and B for quarter 4 2020 and DNFSB did not resolve this issue or others on the warning reports timely. | Closed Partial Repeat carried over to 2021 recommendation 1 |

## APPENDIX V – SCOPE AND METHODOLOGY

**Scope**

The scope of this performance audit is DNFSB's FY 2020 Quarter 4 financial and award data submitted to the DATA Act Broker system.

File E of the DAIMS contains additional awardee attribute information the Treasury DATA Act Broker software extracts from the System of Award Management (SAM). File F contains sub-award attribute information the Broker software extracts from the FFATA Subaward Reporting System (FSRS). Files E and F data remain the responsibility of the awardee in accordance with the terms and conditions of the Federal agreements, and the quality of these data remains the legal responsibility of the recipient. Therefore, agency SAOs are not responsible for certifying the quality of File E and F data reported by awardees, but they are responsible for assuring controls are in place to verify that financial assistance awardees register in SAM at the time of the award. As such, we did not assess the completeness, timeliness, quality, and accuracy of the data extracted from SAM and FSRS via the Treasury broker software system.

**Methodology**

Our audit methodology is prescribed in the CIGIE FAEC Inspectors General Guide to Compliance under the DATA Act (IG Guide) dated December 4, 2020. We performed our audit in accordance with the Government Audit Standards. A general summary of audit procedures consistent with the IG Guide include:

- Obtaining an understanding of any regulatory criteria related to DNFSB's responsibilities to report financial and award data under the DATA Act;

- Reviewing DNFSB's data quality plan;

- Assessing the internal and information system controls in place as they relate to the extraction of data from the source systems and the reporting of data to Treasury's DATA Act Broker, in order to assess audit risk and design audit procedures;

- Reviewing and reconciling the FY 2020 quarter 4 summary-level data submitted by the agency for publication on USASpending.gov;

- Reviewing a statically valid sample the records from FY 2020, quarter 4 financial and award data submitted by the agency for publication on USASpending.gov;

- Assessing the completeness, accuracy, timeliness, and quality of the financial and award data sampled;

- Assessing DNFSB's implementation and use of the 59 data elements/standards established by OMB and Treasury; and

- Obtaining the SAO certification to determine whether the quarterly assurance on DNFSB's controls supporting the reliability and validity of the agency's summary-level and award-level data reported for publication on USAspending.gov is supported.

***Sampling Methodology***

Our sampling methodology was based on the guidance in Appendix 5, Technical Statistical Sampling Technique, of the IG Guide. The IG Guide (Section 720) indicated that the estimated percentage of error rate in the population to be sampled will be determined based on the results of the November 2019 and subsequent testing of the DATA Act information, and additional information that the IG has accumulated related to the agency's internal controls and corrective actions from previous audits. If more than one error rate was determined in the November 2019 DATA Act audit, use the error rate closest to 50%. CLA used the expected error rate of 36% based on the results of November 2019 DATA Act audit report. We statistically selected 33 records reported in File C out of 45 records using the following parameters to calculate our randomly selected sample size:

- Population size of 45 records
- Confidence level of 95%
- Expected error rate of 36%
- Sample precision of 5%

## APPENDIX VI – FEDERAL SPENDING TRANSPARENCY DATA STANDARDS

### (59 standards)

| Number[9] | Data Element | Data Standards[10][11] |
|---|---|---|
| 1 | Appropriations Account | Account Level |
| 2 | Budget Authority Appropriated | Account Level |
| 3 | Object Class | Account Level |
| 4 | Obligation | Account Level |
| 5 | Other Budgetary Resources | Account Level |
| 6 | Outlay | Account Level |
| 7 | Program Activity | Account Level |
| 8 | Treasury Account Symbol (excluding sub-account) | Account Level |
| 9 | Unobligated Balance | Account Level |
| 10 | Action Date | Award Characteristic |
| 11 | Action Type | Award Characteristic |
| 12 | Award Description | Award Characteristic |
| 13 | Award Identification (ID) Number | Award Characteristic |
| 14 | Award Modification/Amendment Number | Award Characteristic |
| 15 | Award Type | Award Characteristic |
| 16* | Business Types | Award Characteristic |
| 17 | CFDA Number | Award Characteristic |
| 18 | CFDA Title | Award Characteristic |
| 19 | NAICs Code | Award Characteristic |
| 20 | NAICS Description | Award Characteristic |
| 21 | Ordering Period End Date | Award Characteristic |
| 22 | Parent Award Identification (ID) Number | Award Characteristic |
| 23 | Period of Performance Current End Date | Award Characteristic |
| 24 | Period of Performance Potential End Date | Award Characteristic |
| 25 | Period of Performance Start Date | Award Characteristic |
| 26 | Primary Place of Performance Address | Award Characteristic |
| 27 | Primary Place of Performance Congressional District | Award Characteristic |
| 28 | Primary Place of Performance Country Code | Award Characteristic |
| 29 | Primary Place of Performance Country Name | Award Characteristic |
| 30 | Record Type | Award Characteristic |

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[9] This is a sequential numbering and does not correspond to the data element number in test results. This information is presented to show the data standards by group.

[10] Source: https://fedspendingtransparency.github.io/data-elements/. All federal agencies are required to report financial and award data for these 59 data elements in accordance with the published data standards.

[11] The National Interest Action and Disaster Emergency Fund Code were required as part of the DATA Act submissions for FY21; however, they are not included as part of the Federal Spending Transparency Data Standards

| Number[9] | Data Element | Data Standards[10][11] |
|---|---|---|
| 31 | Amount of Award | Award Amount |
| 32 | Current Total Value of Award | Award Amount |
| 33 | Federal Action Obligation | Award Amount |
| 34 | Non-Federal Funding Amount | Award Amount |
| 35 | Potential Total Value of Award | Award Amount |
| 36 | Awardee/Recipient Legal Entity Name | Awardee and Recipient |
| 37 | Awardee/Recipient Unique Identifier | Awardee and Recipient |
| 38 | Highly Compensated Officer Name | Awardee and Recipient |
| 39 | Highly Compensated officer Total Compensation | Awardee and Recipient |
| 40 | Legal Entity Address | Awardee and Recipient |
| 41 | Legal Entity Congressional District | Awardee and Recipient |
| 42 | Legal Entity Country Code | Awardee and Recipient |
| 43 | Legal Entity Country Name | Awardee and Recipient |
| 44 | Ultimate Parent Legal Entity Name | Awardee and Recipient |
| 45 | Ultimate Parent Unique Identifier | Awardee and Recipient |
| 46 | Awarding Agency Code | Awarding Entity |
| 47 | Awarding Agency Name | Awarding Entity |
| 48 | Awarding Office Code | Awarding Entity |
| 49 | Awarding Office Name | Awarding Entity |
| 50 | Awarding Sub Tier Agency Code | Awarding Entity |
| 51 | Awarding Sub Tier Agency Name | Awarding Entity |
| 52 | Funding Agency Code | Funding Entity |
| 53 | Funding Agency Name | Funding Entity |
| 54 | Funding Office Code | Funding Entity |
| 55 | Funding Office Name | Funding Entity |
| 56 | Funding Sub Tier Agency Code | Funding Entity |
| 57 | Funding Sub Tier Agency Name | Funding Entity |
| 163 | National Interest Action | NA |
| 430 | Disaster Emergency Fund Code | NA |

## APPENDIX VII – DATA ACT SUBMISSION REQUIREMENTS

### Data Standards, Schema, and Submission
The DATA Act requires Treasury and OMB to:

- Establish Government-wide financial data standards for any Federal funds made available to or expended by Federal agencies and entities receiving Federal funds
- Include common data elements for financial and payment information to be reported

The DATA Act Information Model Schema V.2.0 (DAIMS, Schema), dated May 6, 2020, guides agencies in the production and submission of the required data. Appendix VI lists the 59 data standards. Federal agencies are required to submit their financial data to Treasury using the DATA Act Broker[12] (broker) software. The broker also pulls procurement and financial assistance award and sub-award information from government-wide systems, as agencies are already required to submit such data. Those systems are:

- *Federal Procurement Data System - Next Generation (FPDS-NG)* – Repository for Federal procurement award data operated by the General Services Administration
- *Financial Assistance Broker Submission (FABS)* – Repository for financial assistance transactions on awards of more than $25,000 operated by Treasury
- *Federal Funding Accountability and Transparency Act Subaward Reporting System (FSRS)* – Reporting tool prime awardees use to capture and report sub-award and executive compensation data operated by the General Services Administration
- *Federal Acquisition Regulations (FAR)* – Primary regulation for use by all Federal Executive agencies in their acquisition of supplies and services with appropriated funds.
- *System for Award Management (SAM)* – System that collects registration information from entities doing business with the Federal government.

### Reporting Submission Specification (RSS) and the Interface Definition Document (IDD)
The DATA Act schema includes two documents that contain specifications for reporting required data — the RSS and the IDD.

This includes appropriations account, object class, program activity, and award financial data. Federal agencies must generate and submit three files to the broker:

- *File A* – *"Appropriations Account Detail"* – Contains appropriation summary level data that are aligned with OMB Standard Form 133, "Report on Budget Execution and Budgetary Resources" (SF-133) reporting.
- *File B* – *"Object Class and Program Activity Detail"* – Includes obligation and outlay information at the program activity and object class level.

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[12] The broker is a virtual data layer developed by the U.S. Department of Treasury that maps, ingests, transforms, validates, and submits agency data into a format consistent with the DATA Act Schema (i.e., data exchange standards).

- *File C – "Award Financial Detail"* – Reports the obligation and outlay information at the award level.

The IDD provides detail on data that will be extracted by the broker from other government-wide systems pertaining to procurement and financial assistance data, recipient attributes, and sub-award information. The following four files are generated by this process:

- *File D1 – Award and Awardee Attributes for Procurement (from FPDS-NG)* – Award and awardee details are to be linked to File C
- *File D2 – Award and Awardee Attributes for Financial Assistance (i.e., direct loans, loan guarantees, grants, etc.) (from Financial Assistance Broker Submission)* – Award and awardee details are to be linked to File C
- *File E – Additional Awardee Attributes (from SAM)* – Includes additional prime awardee attributes
- *File F – Subaward Attributes (from Federal Funding Accountability and Transparency Act Subaward Reporting System)* – Includes sub-award information

## CIGIE FAEC Inspectors General Guide to Compliance under the DATA Act (IG GUIDE)
The IG Guide requires auditors to perform procedures in the following areas:

- ***Internal and information system control over agency source systems*** – Auditors are to determine the extent to which agency systems can be relied on as authoritative sources for the information reported in accordance with the DATA Act.

- ***Internal control over DATA Act submission*** – Auditors are to assess the effectiveness of the internal controls implemented to reasonably assure that the data submitted are complete, accurate, timely, and of quality.

- ***Detail testing of data submitted to the broker***: Auditors are to select a quarter within the prescribed range and test an agency's submission, which is used to populate USASpending.gov.
  - *Summary level financial data* –test summary level data for Files A and B.
  - *Record level linkages* – test whether record-level linkages for Files C and D.
  - *Record level data elements* –test a statistically valid sample at the record data element level to determine the completeness, accuracy, timeliness, and overall quality of the data submitted.
  - *COVID-19 outlays* – for those agencies that received COVID-19 funds, test a non-statistical sample at the record data element level to determine the completeness, accuracy, timeliness, and overall quality of the data submitted.

- ***Implementation and use of the data standards*** – review the agency's data inventory/mapping for Files A, B, C, D1 and D2 to ensure that the standardized data elements and OMB and Treasury definitions per the DAIMS are used across agency processes, systems, and applications.

## APPENDIX VIII – CIGIE's DATE ANOMALY LETTER

December 22, 2015

The Honorable Ron Johnson
Chairman
The Honorable Thomas Carper
Ranking Member
Committee on Homeland Security
 and Governmental Affairs
United States Senate
Washington, D.C.

The Honorable Jason Chaffetz
Chairman
The Honorable Elijah Cummings
Ranking Member
Committee on Oversight and Government Reform
U.S. House of Representatives
Washington, D.C.

Dear Mr. Chairmen and Ranking Members:

The Council of the Inspectors General on Integrity and Efficiency (CIGIE) recognizes and appreciates your leadership on issues of Government transparency and accountability. In particular, we believe the enactment last year of the Digital Accountability and Transparency Act of 2014 (DATA Act) will significantly improve the quality of Federal spending data available to Congress, the public, and the accountability community if properly implemented. To make sure this happens, the DATA Act provides for strong oversight by way of the Federal Inspectors General and the Government Accountability Office (GAO). In particular, the DATA Act requires a series of reports from each to include, among other things, an assessment of the completeness, timeliness, quality, and accuracy of data submitted by agencies under the DATA Act.

I am writing this letter on behalf of CIGIE to inform you of an important timing anomaly with the oversight requirement for Inspectors General in the DATA Act. Your staffs have been briefed on this timing anomaly, which affects the first Inspector General reports required by the DATA Act. Specifically, the first Inspector General reports are due to Congress in November 2016. However, the agencies we oversee are not required to submit spending data in compliance with the DATA Act until May 2017. As a result, Inspectors General would be unable to report on the spending data submitted under the Act, as this data will not exist until the following year. This anomaly would cause the body of reports submitted by the Inspectors General in November 2016 to be of minimal use to the public, the Congress, the Executive Branch, and others.

To address this reporting date anomaly, the Inspectors General plan to provide Congress with their first required reports in November 2017, a one-year delay from the due date in statute, with subsequent reports following on a two-year cycle, in November 2019 and November 2021. We believe that moving the due dates back one year will enable the Inspectors General to meet the

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intent of the oversight provisions in the DATA Act and provide useful reports for the public, the Congress, the Executive Branch, and others.

Although we think the best course of action is to delay the Inspector General reports, CIGIE is encouraging the Federal Inspector General Community to undertake DATA Act "readiness reviews" at their respective agencies well in advance of the first November 2017 report. Through a working group, CIGIE has developed guidance for these reviews. I am pleased to report that several Inspectors General have already begun reviews at their respective agencies, and many Inspectors General are planning to begin reviews in the near future. We believe that these reviews, which are in addition to the specific oversight requirements of the Act, will assist all parties in helping to ensure the success of the DATA Act implementation.

We have kept GAO officials informed about our plan to delay the first Inspector General reports for one year, which they are comfortable with, and our ongoing efforts to help ensure early engagement through Inspector General readiness reviews.

Should you or your staffs have any questions about our approach or other aspects of our collective DATA Act oversight activities, please do not hesitate to contact me at (202) 514-3435.

Sincerely,
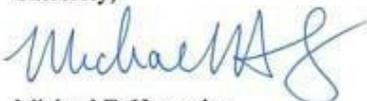
Michael E. Horowitz
Chair, Council of the Inspectors General on Integrity and Efficiency
Inspector General, U.S. Department of Justice

cc:     The Honorable David Mader, Controller, OMB
        The Honorable Gene Dodaro, Comptroller General, GAO