



Audit Report



OIG-20-005

GULF COAST RESTORATION

DATA Act: Council Met DATA Act Reporting Requirements but Data Accuracy Could be Improved

October 30, 2019

Office of Inspector General
Department of the Treasury

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Abbreviations

ARC	Administrative Resource Center
Broker	DATA Act Broker
CIGIE	Council of the Inspectors General on Integrity and Efficiency
CO	Contracting Officer
Council	Gulf Coast Ecosystem Restoration Council
DAIMS	DATA Act Information Model Schema
DATA Act	<i>Digital Accountability and Transparency Act of 2014</i>
DQP	Data Quality Plan
DUNS	Data Universal Numbering System
FABS	Financial Assistance Broker Submission
FAEC	Federal Audit Executive Council
FAIN	Federal Award Identification Numbers
FAR	<i>Federal Acquisition Regulation</i>

FFATA	<i>Federal Funding Accountability and Transparency Act of 2006</i>
FSRS	FFATA Sub-award Reporting System
FSSP	Federal Shared Service Provider
FPDS-NG	Federal Procurement Database System – Next Generation
FY	fiscal year
GAO	Government Accountability Office
GSA	General Services Administration
GTAS	Government-wide Treasury Account Symbol Adjusted Trial Balance System
IAE	Integrated Award Environment
IG	Inspector General
IG Guide	<i>CIGIE FAEC Inspectors General Guide to Compliance under the DATA Act</i>
IPA	Independent Public Accountant
MPM	Management Procedures Memorandum
OIG	Treasury Office of Inspector General
OMB	Office of Management and Budget
Oracle	Oracle Federal Financials
PIID	Procurement Instrument Identifiers
PMO	Program Management Office
PRISM	Procurement Request Information System Management
RAAMS	Restoration Assistance and Award Management System
Recovery Board	Recovery Accountability and Transparency Board
RESTORE Act	<i>Resources and Ecosystems Sustainability, Tourist Opportunities, and Revived Economies of the Gulf Coast States Act</i>
SAM	System for Award Management
SAO	Senior Accountable Official
SF-133	Report on Budget Execution and Budgetary Resources
SOP	Standard Operating Procedures
Certification Statement	FY 2019 Q1 – DATA Act Submission Certification Statement
TAS	Treasury Account Symbol
Treasury	Department of the Treasury
Trust Fund	Gulf Coast Restoration Trust Fund



Audit Report

October 30, 2019

Ben Scaggs
Executive Director
Gulf Coast Ecosystem Restoration Council

This report presents the results of our audit of the Gulf Coast Ecosystem Restoration Council's (Council) reporting of financial and payment information as required by the *Digital Accountability and Transparency Act of 2014* (DATA Act).¹ This report is the second in a series of mandated reviews required by the DATA Act.^{2,3} Our audit objectives were to assess the (1) completeness, accuracy, timeliness, and quality of the financial and award data submitted for publication on USAspending.gov; and (2) Council's implementation and use of the Government-wide financial data standards established by the Office of Management and Budget (OMB) and the Department of the Treasury (Treasury). The scope of our audit included fiscal year (FY) 2019 first quarter⁴ financial and payment data submitted for publication by the Council, and any applicable procedures, certifications, documentation, and controls to achieve this process.

In performing our work, we followed the guidance from the Council of the Inspectors General on Integrity and Efficiency (CIGIE) Federal Audit Executive Council's (FAEC) *CIGIE FAEC Inspectors General Guide to Compliance Under the DATA Act* (IG Guide),⁵ which presents a common methodological and reporting approach for the Inspector General (IG) community to use in performing its DATA

¹ Public Law 113-101 (May 9, 2014).

² Office of Inspector General (OIG), *DATA Act: Council Met Reporting Requirements Under the DATA Act Despite Challenges* (OIG-18-008; November 2, 2017).

³ A subsequent report will follow on a 2-year cycle, in November 2021.

⁴ FY 2019 first quarter data is for the period October 1 through December 31, 2018.

⁵ FAEC DATA Act Working Group, *CIGIE FAEC Inspectors General Guide to Compliance under the DATA Act* (February 14, 2019).

Act work. To accomplish our objectives, we reviewed laws, regulations, and guidance related to the Council’s reporting responsibilities under the DATA Act. We conducted interviews with key Council personnel responsible for the Council’s compliance with the DATA Act reporting requirements. Based on the Council’s low volume of financial and payment data for FY 2019 first quarter (three procurement awards and two grant awards), we tested 100 percent of the Council’s transactions for completeness, timeliness, accuracy, and quality of financial and payment data. We also reviewed relevant documents such as the Council’s (1) Data Quality Plan (DQP); (2) Standard Operating Procedures (SOPs); (3) quarterly financial report reconciliations; (4) DATA Act Broker⁶ (Broker) submission along with supporting documentation; and (5) “FY 2019 Q1– DATA Act Submission Certification Statement” (Certification Statement). We conducted our fieldwork from January through September 2019. Appendix 1 contains a detailed description of our objectives, scope, and methodology.

Results in Brief

We found that the Council’s FY 2019 first quarter data submission met the standards for completeness, accuracy, timeliness, and was of higher quality (i.e. contained less than 20 percent errors). Furthermore, the Council’s data was submitted to the Broker on March 19, 2019, meeting Treasury’s Program Management Office’s (PMO) March 20, 2019 deadline for publication on USAspending.gov.⁷ Appendix 2 provides definitions for completeness, accuracy, timeliness, and quality of DATA Act reporting. We also found that the Council fully implemented and used the Government-wide financial data standards established by OMB and Treasury in August 2015.

⁶ The Broker is an information system that collects, maps, transforms, validates, and submits agency financial and award data into a format consistent with the DATA Act Information Model Schema (DAIMS), which is discussed further herein.

⁷ Typically, agencies are allowed 45 days after quarter end for certification of data. Due to the Federal Government shutdown from December 22, 2018 through January 25, 2019, Treasury’s PMO extended the due date for FY 2019 first quarter submission certifications to March 20, 2019.

While the Council's FY 2019 first quarter data was found to be of higher quality, we found errors in certain procurement data elements made by the Bureau of the Fiscal Service's Administrative Resource Center (ARC),⁸ as described in Finding 1. As a result, certain procurement data elements in the Council's data submission were inaccurate. Specifically, the award type and action date for one contract included in File D1 did not match the contract (the authoritative source record).

We recommend that the Council's Executive Director ensures that the Senior Accountable Official (SAO)⁹ (1) directs ARC to correct the procurement data errors identified in the Federal Procurement Database System – Next Generation (FPDS-NG); and (2) improves oversight of ARC's future DATA Act submissions to ensure the accuracy of the Council's data.

In a written response, Council management agreed with our audit report that found that the Council's FY 2019 first quarter data submission met the standards for completeness, accuracy, timeliness, and was of higher quality (i.e. contained less than 20 percent errors), and that the Council fully implemented and used the Government-wide financial data standards established by OMB and Treasury in August 2015. Management also concurred that while the Council's FY 2019 first quarter data was found to be of higher quality, there were errors in certain procurement data elements of the Council's data submission. To address our recommendations, management responded that the SAO worked with ARC to correct the procurement errors and held meetings with ARC to ensure that proper oversight is in place to ensure the accuracy of the Council's data, which included reviewing ARC's internal procedures for data review and producing periodic data element reports that will be sent to the SAO for review. Council's

⁸ ARC is a Federal Shared Service Provider (FSSP) that provides a full range of administrative services for various Federal agencies. Shared services are arrangements under which one agency (the provider) provides information technology, human resources, financial, or other services to other departments, agencies, and bureaus (the customer). OMB and Treasury designated Treasury's Bureau of the Fiscal Service's ARC as a FSSP for financial management.

⁹ A SAO is a high-level senior official who is accountable for the quality and objectivity of Federal spending information.

management response, in its entirety, is included as appendix 5 of this report.

Background

DATA Act

The DATA Act was signed into law by the President on May 9, 2014, and serves to:

- expand the *Federal Funding Accountability and Transparency Act of 2006* (FFATA)¹⁰ by disclosing direct Federal agency expenditures and linking Federal contract, loan, and grant spending information to programs of Federal agencies to enable taxpayers and policymakers to track Federal spending more effectively;
- establish Government-wide data standards for financial data and provide consistent, reliable, and searchable Government-wide spending data that is displayed accurately for taxpayers and policymakers on USAspending.gov (or a successor system that displays the data). Appendix 4 provides the required data elements and their definitions;
- simplify reporting for entities receiving Federal funds by streamlining reporting requirements and reducing compliance costs while improving transparency;
- improve the quality of data submitted to USAspending.gov by holding Federal agencies accountable for the completeness and accuracy of the data submitted; and
- apply approaches developed by the Recovery Accountability and Transparency Board (Recovery Board) to spending across the Federal government.¹¹

¹⁰ Public Law 109-282 (September 26, 2006).

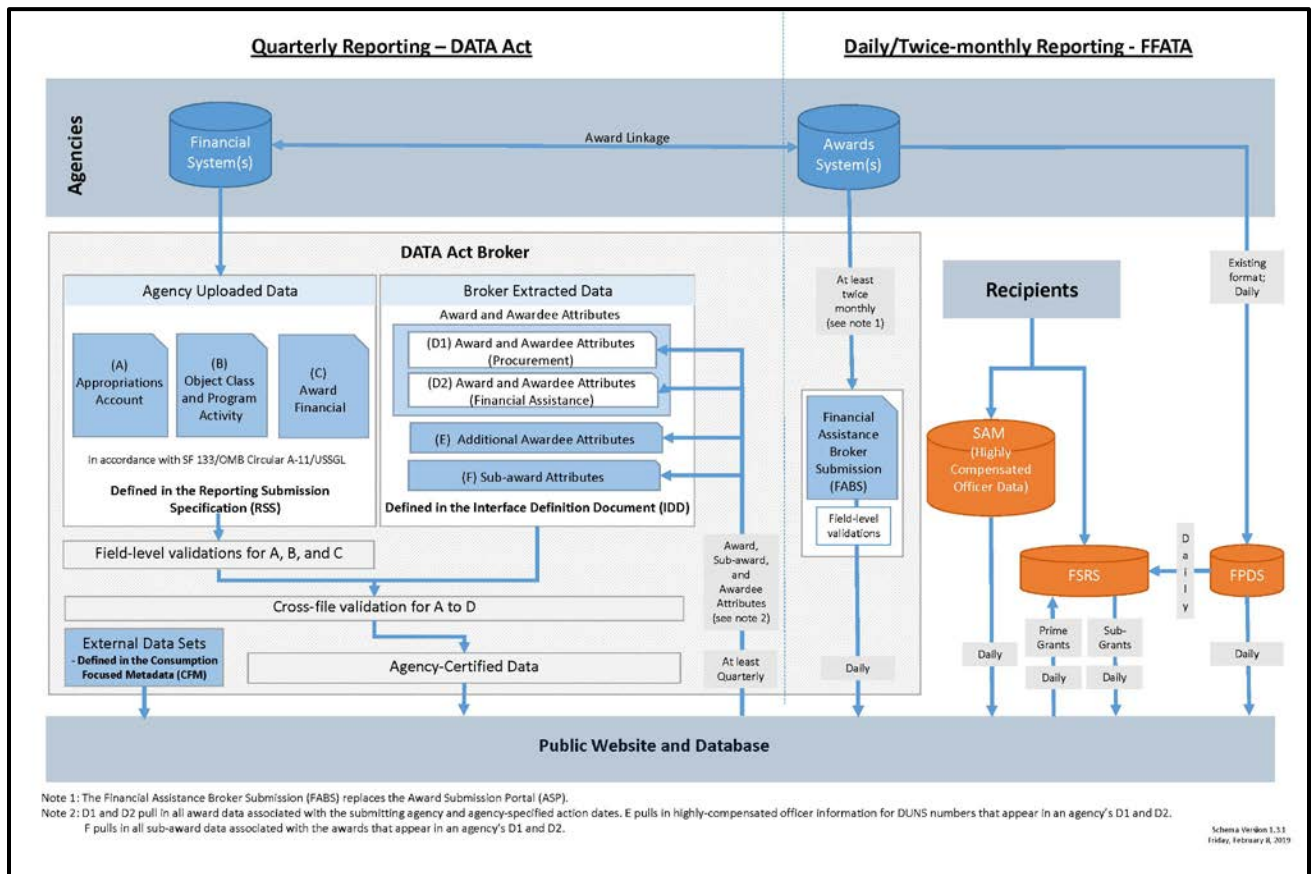
¹¹ The Recovery Board was a Federal entity that managed Recovery.gov that displayed spending reported by recipient agencies under the *American Recovery and Reinvestment Act of 2009*. Pursuant to the law, the Recovery Board ceased operations in September 2015.

The DATA Act imposes requirements on each Federal agency and its IG. Specifically, the DATA Act required that any funds made available to, or expended by, a Federal agency or its component, be accurately reported and displayed on USAspending.gov by May 9, 2017,¹² in accordance with the financial data standards established by Treasury's PMO and OMB.

As depicted in Figure 1 below, the DATA Act Information Model Schema (DAIMS) provides the DATA Act flow of information from agency financial and award systems to public websites and the sources of data for the individual DATA Act submission files.

¹² The initial DATA Act reporting was submitted to a beta version of the USAspending.gov website (beta.USAspending.gov). The beta version has since been transitioned to the official site as of March 2018 and is no longer available.

Figure 1: DATA Act Information Model Schema Flow Diagram



Source: <https://fiscal.treasury.gov/files/data-transparency/daims-information-flow-diagram-v1.3.1.pdf>

The following is a description of the flow of information depicted in Figure 1.

- Files A through C are uploaded to the Broker from Federal agency financial systems; the Broker performs field level validation checks of the files.

-
- File A includes appropriation summary level data that aligns to the Standard Form-133, *Report on Budget Execution and Budgetary Resources* (SF-133).¹³
 - File B includes obligation and outlay information at the program activity and object class level.¹⁴
 - File C includes obligations at the award (procurement and financial assistance) and object class level.
 - Once Files A through C are uploaded, the Broker then generates from external award reporting systems four additional datasets: Files D1, D2, E, and F.
 - File D1 contains award and awardee details associated with procurement awards found in File C, and is extracted from the FPDS-NG.¹⁵
 - File D2 includes award and awardee details associated with financial assistance awards in File C, and is extracted from the Financial Assistance Broker Submission (FABS).¹⁶
 - File E includes highly compensated officer data associated with any unique identifier present in Files D1 and D2.¹⁷ File E is extracted from the System for Award Management (SAM).¹⁸
 - File F includes all sub-award data associated with the awards that appear in Files D1 and D2, and is

¹³ The SF-133 Report on Budget Execution and Budgetary Resources provides a consistent presentation of data across programs within each agency. An agency-wide SF-133 should generally agree with an agency's Statement of Budgetary Resources. The Statement of Budgetary Resources and related disclosures provide information about budgetary resources made available to an agency and the status of those resources at the end of the FY.

¹⁴ Obligation, program activity, and object class are defined in appendix 4.

¹⁵ FPDS-NG is used by Federal agencies to report all contract actions, including modifications, using appropriated funds for contracts whose estimated value is at or above \$10,000. FPDS-NG is administered by the General Services Administration (GSA).

¹⁶ FABS, administered by Treasury's PMO, is the portal used by Federal agencies to upload financial assistance data.

¹⁷ Awardee/recipient unique identifier is defined in appendix 4.

¹⁸ SAM is the primary database in which those seeking to do business with the Federal government must maintain an active registration unless exempt. SAM is administered by GSA.

extracted from the FFATA Sub-award Reporting System (FSRS).¹⁹

- Once the Broker generates Files D1, D2, E, and F, it performs an intra-file validation check of data in Files A, B, and C; and a cross-file validation of linkages across Files A through D2.²⁰
- Each Broker validation check generates fatal error and warning reports for viewing and download; agencies should note any warnings and correct Broker-generated validation errors. Fatal errors indicate incorrect values for fundamental data elements; agencies are unable to submit data containing errors. Warnings alert the agency to possible issues worth further review and will not prevent the agency from submitting its data.
- Each reporting agency's SAO must provide quarterly assurance²¹ that their agency's internal control supports the reliability and validity of its data submitted for display on USAspending.gov and that the linkages among Files A through F are valid. This assurance is provided by the SAO certifying its agency's data submission in the Broker along with categorical explanations for misalignments between files.
- Following the agency SAO's certification, the Broker uploads each agency's submission for publication on USAspending.gov.

The DATA Act requires the IG of each Federal agency to perform a series of reviews of statistically valid samples of spending data submitted under the DATA Act. The IGs must submit to Congress (and make publically available) a report assessing the completeness, timeliness, accuracy, and quality of the data sampled, as well as the implementation and use of financial data

¹⁹ FSRS provides data on first-tier sub-awards as reported by the prime grantee and contract award recipients (awardees). FSRS is administered by GSA.

²⁰ There are no file validations for Files E and F. It is the prime awardee's responsibility to report sub-award and executive compensation information in SAM and FSRS. As such, the data is reported directly from the authoritative sources, SAM and FSRS, respectively.

²¹ In general, an assurance is a statement of accountability to confirm an agency's efforts to support data quality.

standards by the Federal agency. The first IG reports were due to Congress in November 2016, and subsequent reports in November 2018 and November 2020. However, due to a reporting date anomaly, the first report was due by November 8, 2017, a 1-year delay from the statutory due date, with subsequent reports following on a 2-year cycle ending in November 2021.²²

In our November 2017 report,²³ we reported that certain Council financial and award data did not meet standards for completeness, timeliness, accuracy, and quality based on the following three variances in the Council's fiscal year 2017, second quarter data submission: (1) a procurement award was in File C, but not in File D1; (2) a grant award was included in the Council's File D2, but not in its File C submission; and (3) Files A and B did not reconcile due to adjustments to obligations made during the first quarter of fiscal year 2017, that were not included in the Council's fiscal year 2017, second quarter data. We recommended that the Council's Acting Executive Director ensure that the Council's SAO: 1) continued to refine the Council's policies and procedures for compliance with the DATA Act requirements, and 2) continued to work closely with ARC to address the timing and ARC errors for future DATA Act submissions. As part of this audit, we verified that Council implemented our prior recommendations and that the previous variances noted did not reoccur.

Council Background

In response to environmental challenges and the 2010 Deepwater Horizon oil spill, on July 6, 2012, the President signed into law the

²² CIGIE identified a reporting date anomaly with the oversight requirements 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, 1-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 Reform. The letter is provided in appendix 3.

²³ See footnote 2.

Resources and Ecosystems Sustainability, Tourist Opportunities, and Revived Economies of the Gulf Coast States Act (RESTORE Act).²⁴ The RESTORE Act established the Council, and tasked it with developing and overseeing a Comprehensive Plan to restore the ecosystem and economy of the Gulf Coast region.²⁵ The Council is comprised of governors from the five affected Gulf States (Alabama, Florida, Louisiana, Mississippi, and Texas), the Secretaries from the U.S. Departments of the Interior, Commerce, Agriculture, and Homeland Security, as well as the Secretary of the Army, and the Administrator of the U.S. Environmental Protection Agency.

The RESTORE Act also established the Gulf Coast Restoration Trust Fund (Trust Fund), which resides within Treasury.²⁶ The Trust Fund provides financial resources for the environmental and economic restoration and protection of the Gulf Coast region. Deposits into the Trust Fund will be comprised of 80 percent of all civil and administrative penalties paid by responsible parties after July 6, 2012, under the *Federal Water Pollution Control Act*.^{27,28}

The Council has responsibility for awarding funds through grants and interagency agreements under the Council-Selected Restoration Component and the Oil Spill Impact Component of the Trust Fund. The Restoration Assistance and Award Management System

²⁴ Public Law 112-141, 126 Stat. 588-607 (July 6, 2012).

²⁵ As defined in the RESTORE Act, the term Gulf Coast region represents (a) in the Gulf Coast States (Alabama, Florida, Louisiana, Mississippi, and Texas), the coastal zones that border the Gulf of Mexico; (b) any adjacent land, water, and watersheds that are within 25 miles of the coastal zones of the Gulf Coast States; and (c) all Federal waters in the Gulf of Mexico.

²⁶ The RESTORE Act divides the Trust Fund into five components and their respective percentages: the Direct Component (35 percent); the Comprehensive Plan Component, also known as the Council-Selected Restoration Component (30 percent); the Oil Spill Impact Component (30 percent); the National Oceanic and Atmospheric Administration RESTORE Act Science Program (2.5 percent); and the Centers of Excellence Research Grants Program (2.5 percent).

²⁷ 33 U.S.C. § 1251 et seq.

²⁸ As of April 9, 2019, the total deposits and related interest in the Trust Fund was approximately \$1.7 billion as a result of the Federal government's settlements with Transocean, Anadarko Petroleum Corporation, and BP Exploration & Production Inc. defendants. This amount includes all payments due from Transocean and Anadarko Petroleum and the first three of BP Exploration & Production Inc.'s fifteen required annual payments.

(RAAMS)²⁹ is used by the Council to administer these grants and interagency agreements. Through an interagency agreement, ARC provides financial and administrative services to the Council. As such, the Council's financial data and procurement data resides in ARC's source systems, Oracle Federal Financials (Oracle), and Procurement Request Information System Management (PRISM), respectively.

Council DATA Act Submission Process

Under the DATA Act, the Council is required to report its financial and payment data quarterly to USAspending.gov. ARC generates Files A through C, which contain the Council's budgetary information. Once Files A through C are submitted by ARC and Files D1 and D2 are generated in the Broker, cross file validation checks are performed by the Broker validation tool, which identifies any potential warnings and/or fatal errors for Files A through D2. Fatal errors identified by the Broker in Files A through D1 must be corrected by ARC and fatal errors in File D2 must be corrected by the Council. After the correction of any fatal errors, ARC provides the results of the Broker validation checks of Files A through D2 to the Council for final review.

Before certifying its data submission, the Council will review the Broker validation reports for Files A through D2. If validation warnings are present, Council staff will evaluate those warnings to determine if they indicate an underlying error with the data. The Council works with ARC to correct the warnings, and if necessary, ARC will resubmit files A through C to the Broker for validation. After completing the validation checks, the Broker generates Files E and F. Files E and F are compiled from information contained in GSA systems, SAM and FSRS, respectively. Awardees are responsible for the data included in Files E and F rather than the Council. Files A through F, updated as necessary, must be sent to the Council, along with any new validation warnings. Once the

²⁹ The Council is replacing RAAMS with GrantSolutions, which is administered by the Department of Health and Human Services, in first quarter of FY 2020. The Council is planning to transition the grant award and compliance data to GrantSolutions, while housing the programmatic aspects of the programs in a new system, Program Information Platform for Ecosystem Restoration, being developed by the United States Geological Survey.

Council staff approves all files, the Council's SAO will certify that the data submission is reliable and valid and inform ARC to submit the data files to the Broker. Lastly, the Broker uploads the quarterly reporting files for publication on USAspending.gov.

Audit Results

Council Met Reporting Requirements Under the DATA Act

We found that the Council's FY 2019 first quarter data submission met the standards for completeness, accuracy, timeliness, and was of higher quality (i.e. contained less than 20 percent errors). Furthermore, the Council's data was submitted to the Broker on March 19, 2019, meeting Treasury's PMO's March 20, 2019 deadline for publication on USAspending.gov. Appendix 2 provides definitions for completeness, timeliness, accuracy, and quality of DATA Act reporting. We also found that the Council fully implemented and used the Government-wide financial data standards established by OMB and Treasury in August 2015.

While the Council's FY 2019 first quarter data was found to be of higher quality, we found errors in certain procurement data elements made by ARC as described in Finding 1. As a result, certain procurement data elements in the Council's data submission were inaccurate. Specifically, the award type and action date for one contract included in File D1 did not match the contract (the authoritative source record).

The following describes our review of the completeness, accuracy, timeliness, and quality of the Council's FY 2019 first quarter data and the Council's implementation and use of the data standards established by OMB and Treasury.

Council's FY 2019 First Quarter Data Met the Standards for Completeness, Accuracy, Timeliness, and Quality

We reviewed internal control as it related to the Council's DQP to identify and manage risk, as well as the source systems containing the Council's data. We also tested 100 percent of the Council's FY

2019 first quarter financial and payment data related to the three procurement awards and two grant awards submitted to the Broker.

Data Quality Plan

The Council developed and implemented its DQP in February 2019 in accordance with OMB M-18-16, *Appendix A to OMB Circular No. A-123, Management of Reporting and Data Integrity Risk* (June 6, 2018).³⁰ OMB required that the DQP considers the incremental risks to data quality in Federal spending data and any controls that would manage such risks. The purpose of the DQP is to identify a control structure tailored to address identified risks. The Council's DQP documented the Council's FY 2019 approach to achieving reasonable assurance of internal control over quarterly DATA Act reporting. Specifically, the Council's DQP included: (1) the Council's organizational structure and key controls; (2) enterprise risk management testing plan; (3) and actions taken to manage risks. Among its key controls over DATA Act reporting, the Council follows policies and procedures as documented in its formalized SOPs for the following processes: (1) "Broker Certification," (2) "Financial Assistance Broker Submission," and (3) "RAAMS Grant Payment Reconciliation."

The DQP also refers to the Council's heavy reliance on ARC as its FSSP and the associated risk of inaccurate data from ARC. Council's plan to mitigate this risk is through frequent and open communication between the Council and ARC personnel.

Internal Control Over Source Systems

During FY 2019 first quarter, the Council processed award data for three procurements and two grants. Through an interagency agreement, ARC processed and administered the related financial

³⁰ OMB Circular No. A-123, "Management's Responsibility for Enterprise Risk Management and Internal Control," defines management's responsibilities for enterprise risk management and internal control. It also provides updated implementation guidance to Federal managers to improve accountability and effectiveness of Federal programs as well as mission-support operations through implementation of enterprise risk management practices and by establishing, maintaining, and assessing internal control effectiveness. A-123 emphasizes the need to integrate and coordinate risk management and strong and effective internal control into existing business activities and as an integral part of managing an Agency.

and payment data in Oracle and the procurement data in PRISM for these transactions. While Council manages its grants and interagency agreements in RAAMS, the FY 2019 first quarter data contained in Files A through D1 was based on data maintained in ARC's source systems. The Council's SAO reviewed and approved the FY 2019 first quarter financial and payment data related to the three procurement awards submitted to ARC for entry into Oracle and PRISM. The Council relied on ARC's systems and controls to ensure the completeness, accuracy, timeliness, and quality of its FY 2019 first quarter data and that the data standards established by OMB and Treasury were fully implemented and used.

An independent public accountant (IPA) examined ARC's controls over its source systems, Oracle and PRISM. The IPA tested, in part, ARC's controls designed to meet objectives including: (1) providing reasonable assurance that Government-wide reporting is complete, accurate, timely, and performed in accordance with ARC policies and procedures; and (2) providing reasonable assurance that acquisitions are made by an authorized Contracting Officer (CO) who certifies the award is complete, accurate, and meets legal and regulatory requirements. In its Service Organization Controls report, the IPA reported that ARC designed and implemented controls for the period of July 1, 2018 to June 30, 2019. No exceptions were noted related to ARC's controls over the Council's DATA Act submission.³¹

The FY 2019 first quarter grants data contained in File D2 resides in the Council's source system, RAAMS. We confirmed the Council performed monthly reconciliations of its accounting and RAAMS records to ensure the integrity of the data. We reviewed the Council Technical Analyst's monthly process to submit the RAAMS data to the FABS portal within the Broker, and confirmed a FABS report was uploaded to the FABS portal. The Council Technical Analyst notified the Senior Grants Manager via email that the FABS report was validated and ready for approval. After reviewing the submission, the Senior Grants Manager notified the Technical Analyst of approval for publication on USAspending.gov. Once the

³¹ *OIG, Financial Management: Report on the Bureau of the Fiscal Service Administrative Resource Center's Description of its Financial Management Services and the Suitability of the Design and Operating Effectiveness of its Controls for the Period July 1, 2018 to June 30, 2019* (OIG-19-043; August 30, 2019)

FABS submission was approved, the Council Technical Analyst published the submission within the Broker and informed the Senior Awards Manager that the submission was complete. Once the File D2 data was visible on USAspending.gov, we confirmed that the Senior Grants Manager compared the award information on the website for consistency with the information in RAAMS and found no exceptions.

Broker Certification

ARC generated Files A through C from its source systems and uploaded them to the Broker, which performed validation checks. ARC then generated Files D1, D2, E, and F via the Broker. There were no final warnings or errors found for Files A through D2 using the Broker validation tool. Subsequently, the Council staff recommended the SAO to certify the FY 2019 first quarter data.

On March 19, 2019, the Council's SAO, in coordination with ARC, certified and submitted its FY 2019 first quarter data in the Broker for publication on USAspending.gov. The Council provided its Certification Statement, which indicated no final warnings for Files A through D2 in FY 2019 first quarter. By signing the Certification Statement, the Council's SAO provided assurances at three certification levels over its FY 2019 first quarter data: (1) the complete DATA Act quarterly submission to USAspending.gov was valid and reliable; (2) the data in each DATA Act file reported in the quarterly submission to USAspending.gov was valid and reliable; and (3) the data reported to USAspending.gov matched or was directly provided by the authoritative sources outlined in OMB's Management Procedures Memorandum (MPM) 2016-03, *Additional Guidance for DATA Act Implementation: Implementing Data-Centric Approach for Reporting Federal Spending Information* (May 3, 2016).

Completeness and Timeliness of the Council's Data Submission

To be considered a complete data submission, all transactions and events that should have been recorded are recorded in the proper period per the IG Guide. We evaluated Files A, B, and C and found that all FY 2019 first quarter data transactions and events that should have been recorded were recorded in the proper period. To be considered timely, the data submission to the Broker must be in

accordance with the schedule established by the Treasury PMO. The FY 2019 first quarter data submission to the Broker was due March 20, 2019. We evaluated the Council's data submission to the Broker and determined that the submission was complete and submitted timely on March 19, 2019.

Summary-Level Data and Linkages for Files A, B, and C

We reconciled the data contained in Files A and B to Government-wide Treasury Account Symbol Adjusted Trial Balance System (GTAS) records and determined that the files were accurate. Additionally, we reconciled the linkages between Files A, B, and C and determined that the linkages were valid and that there were no variances between the files. Specifically, we performed the following procedures and determined that the Council's summary-level financial data included in Files A, B, and C was complete and accurate.

- To assess the completeness of File A, we compared the appropriations account summary-level data in File A to the information included on the Council's quarterly GTAS SF-133, and determined File A included all Treasury Account Symbols (TAS) from which funds are obligated. To assess the accuracy of File A, we selected all summary-level data from File A and matched the data elements to the Council's GTAS SF-133.
- To assess the completeness of File B, we compared the data in File B to the TASs listed in File A and determined all TASs in File A are accounted for in File B. To assess the accuracy of File B, we verified the totals in Files A and B are equal. In addition, we verified that all object codes found in File B matched codes defined in Section 83 of OMB Circular A-11.³² All program activity names and codes found in File B matched the Council's information in the "Appendix, Budget of the United States Government, Fiscal Year 2019."
- To assess the completeness and accuracy of File C, we traced the TAS, object class, and program activity data

³² OMB Circular A-11, *Preparation, Submission, and Execution of the Budget* (July 1, 2014, Revised November 2014).

elements from File C to File B to ensure all exist in File B. We determined that all TAS, object class, and program activity data activity elements from File C existed in File B.

Record-Level Data and Linkages for Files C and D

The IG Guide requires IGs to review a statistically valid sample of certified spending data submitted by agencies. Based on the Council only having five transactions (three procurement awards and two grant awards) during FY 2019 first quarter, we determined that testing 100 percent of transactions contained in Files C, D1, and D2 would be appropriate to assess the transaction data and record-level linkages. Therefore, we did not perform statistical sampling procedures.

We tested the linkages between File C and Files D1 and D2 and verified the awards that should appear in File C linked to awards reported in Files D1 and D2 by matching the Procurement Instrument Identifiers (PIID) in File C to the PIIDs in File D1 and the Federal Award Identification Numbers (FAIN) from File C to the FAINs in File D2 and vice versa. We did not find any errors while comparing the award financial data to the procurement and financial assistance awards; however, there was one allowable exception related to a no cost contract modification.³³

Completeness of the Data Elements

The error rate for the completeness of the Council's data elements was 1.88 percent. Per the IG Guide, a data element was considered complete if the required data element that should have been reported was reported in the appropriate Files A through D2.

We identified four errors where the required data element that should have been reported was not reported in File D2. Specifically, the Awarding Office Code, Funding Office Code and its respective derived data elements, Awarding Office Name and Funding Office

³³ The noted exception was for a no cost contract modification that existed in the Council's File D2 but not in File C. Per the IG Guide, "Awards that contain no cost modifications, such as extending the period of performance, would be reported in File D1/D2, but not in File C. Because these awards do not have a financial transaction associated with the modification, there would be no record in the financial system and therefore, no associated record in File C."

Name, were not reported for one grant award. In accordance with the OMB's "MPM No. 2016-03," Federal agencies are required to track both the Federal awarding office and Federal funding office data elements in their award management systems, and to report them to USAspending.gov for all new financial assistance awards issued on or after October 1, 2018. To implement the new requirement, the Broker leveraged the GSA Integrated Award Environment (IAE) Federal Hierarchy to display agency and sub-tier level information. The four data element errors were attributable to the Broker since there was a delay in implementation of the IAE Federal Hierarchy validations and derivations within FABS. A Council official explained that the Council submitted its IAE Federal Hierarchy updates in September 2018. However, the FABS portal was unable to validate the Awarding and Funding Office fields during the FY 2019 first quarter submission. The Council official further explained that the submissions that included these data fields received a validation error in FABS so these fields had to be blank in order to submit the data in FABS.

Accuracy of the Data Elements

The error rate for the accuracy of the data elements was 3.29 percent due to seven errors. Per the IG Guide, a data element was considered accurate when amounts and other data relating to recorded transactions were recorded in accordance with the DAIMS, Reporting Submission Specification, Interface Definition Document, and the online data dictionary, and agree with the authoritative source records. We identified four inaccurate data elements in File D2 that did not match the authoritative source records. As noted above, the Awarding Office Code and Funding Office Code and its respective derived data elements, Awarding Office Name and Funding Office Name, were incomplete, and therefore, inaccurate for one grant award due to the delay in the Broker's implementation of the IAE Federal Hierarchy validations and derivations within FABS. We also found three inaccurate data elements in File D1 that did not match the data in FPDS-NG, the authoritative source record for File D1. Specifically, the Legal Entity Address, Award Type, and Action Date were inaccurate for one procurement award. The inaccurate Legal Entity Address was attributable to the FPDS-NG, a third party system, pulling the incorrect address as this field was automatically populated in PRISM and FPDS-NG based on the recipients' Data Universal

Numbering System (DUNS) number³⁴ via SAM. The inaccurate Award Type and Action Date were results of ARC personnel inputting inaccurate procurement data in FPDS-NG.

Timeliness of the Data Elements

All of Council's FY 2019 first quarter financial and award data elements were reported timely. The timeliness of data elements was based on the data elements that should have been reported were reported in accordance with the reporting schedules defined by the financial, procurement, and financial assistance requirements of FFATA, *Federal Acquisition Regulation (FAR)*, FPDS-NG, and DAIMS. To assess the timeliness of the data elements, we verified that: (1) the award financial data elements within File C were reported in FY 2019 first quarter when transactions occurred in accordance FFATA; (2) the procurement award data elements within File D1 were reported in FPDS-NG within three business days after contract award in accordance with the FAR Part 4.604; (3) the financial assistance award data elements within File D2 were reported no later than 30 days after award in accordance with FFATA; and (4) the Council submitted data to the FABS portal by the 5th of each month in accordance with DAIMS.

Files E and F Data

File E contains additional awardee attribute information the Broker extracts from SAM. File F contains sub-award attribute information the Broker extracts from FSRs. Files E and F data remains the responsibility of the awardee in accordance with terms and conditions of Federal agreements; and the quality of this data remains the legal responsibility of the recipient. Therefore, agency SAOs are not responsible for certifying the quality of Files 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, accuracy, timeliness, and quality of the data extracted from SAM and FSRs via the Broker. However, we

³⁴ The DUNS number is the unique identification number for an awardee or recipient, which is a 9-digit number assigned by Dun & Bradstreet.

verified that the Council ensured that awardees registered in SAM prior to awarding funds in FY 2019 first quarter.

Quality of the Data

The quality of the data elements was determined by using the overall error rates for completeness, accuracy, and timeliness. The highest of the three error rates was used as the determining factor of quality. Table 1, from the IG Guide, provides the range of error rates in determining the quality of the data elements.

Table 1: Data Quality Levels

Highest Error Rate	Quality Level
0% - 20%	Higher
21% - 40%	Moderate
41% and above	Lower

Source: FAEC DATA Act Working Group, IG Guide

Based on our test work and the highest error rate of 3.29 percent related to the accuracy of the data elements, we determined that the quality of the Council’s data was of higher quality.

Table 2 summarizes the data element errors attributable to a third party system.

Table 2: Errors in Data Elements Attributable to a Third Party System

PIID/FAIN	Data Element	Attributed To
PIID	DE 5 Legal Entity Address	FPDS-NG Extracting from SAM
FAIN	DE 42 Funding Office Name	Broker
FAIN	DE 43 Funding Office Code	Broker
FAIN	DE 48 Awarding Office Name	Broker
FAIN	DE 49 Awarding Office Code	Broker

Source: Treasury OIG

Table 3 summarizes the data element errors attributable to the Council’s FSSP, ARC.

Table 3: Errors in Data Elements Attributable to the Council’s FSSP, ARC

PIID/FAIN	Data Element		Attributed To
PIID	DE 16	Award Type	ARC personnel
PIID	DE 25	Action Date	ARC personnel

Source: Treasury OIG

Council Implemented and Used Data Standards Established by OMB and Treasury

We evaluated the Council’s implementation and use of the government-wide financial data standards for spending information as established by OMB and Treasury. The Council received regular updates from Treasury PMO for the schema and the data elements via a distribution list; participated in regularly scheduled DATA Act “Office Hour” meetings for feedback and implementation of minor changes to the data standards; and participated in the IAE Financial Assistance Committee for E-Government teleconference to discuss Federal hierarchy changes to ensure the Council’s information is properly reported.

Based on our assessment of the data accuracy, completeness, accuracy, timeliness, and quality, we determined that the Council fully implemented and used data standards established by OMB and Treasury. That is, we assessed the completeness and proper use of the data standards for Files A and B by ensuring that summary-level financial data was reported in the proper reporting period and contained all the applicable data elements required by the DATA Act. Additionally, we reviewed Files C through D2 and determined that all of the Council’s transactions for FY 2019 first quarter contained the applicable data elements required by the DATA Act, with the exception of data elements that were not included due to errors outside of the Council’s control discussed above, and determined that each data element was presented accurately and in accordance with the data standard for that respective element.

Finding 1

Council’s Procurement Data Had Errors

While we found Council’s FY 2019 first quarter data met DATA Act reporting requirements, we found that there were procurement data element errors made by ARC. Specifically, the award type for one of the Council’s contracts in File D1 was inaccurate. Based on

the signed contract, the award type was a Labor Hour Blanket Purchase Agreement. However, the award type reported in the File D1 showed a Fixed-Price Blanket Purchase Agreement. We also noted that the action date when the Government signed the same contract was inaccurate in File D1. The contract was signed on November 23, 2018; however, the action date in File D1 showed November 27, 2018.

The Council's interagency agreement with ARC for financial and administrative services includes the procurement system platform, PRISM, acquisition services, and contract administration. ARC inputs the Council's awarded contract data into PRISM, which is integrated with FPDS-NG. When a contract action is taken, an ARC Contracting Specialist will prepare a form containing key procurement information required to be input into FPDS-NG. An ARC CO will then review the accuracy of information entered into PRISM and FPDS-NG and approve entries if no errors are noted. Per the FAR Part 4.604, both the submission and accuracy of data in FPDS-NG are the responsibility of the CO who awards the contract action. In the case of the errors noted above, both the award type and action date were the result of incorrect data entries in FPDS-NG by the ARC Contracting Specialist. As a result, the Broker then pulled the incorrect data from FPDS-NG for inclusion in the Council's File D1 submission that was published on USAspending.gov.

According to the DATA Act, to improve the quality of data submitted to USAspending.gov, Federal agencies are held accountable for the completeness and accuracy of the data submitted. A Council official stated that the staff did not review data entered in FPDS-NG because the Council relies heavily on ARC to review for accuracy. In addition, the Council did not have access to FPDS-NG during the FY 2019 first quarter. As a result, the Council's File D1 data was not fully accurate, and therefore, less reliable and useful. Furthermore, the Council's future DATA Act submissions are at risk of not meeting the standard for highest quality as potential errors may increase and not be identified.

Recommendations

We recommend that the Council's Executive Director ensures that the SAO:

1. Directs ARC to correct the procurement data errors identified in the FPDS-NG.

Management Response

Management responded that the SAO worked with ARC to correct these errors.

OIG Comment

Management's stated actions meet the intent of our recommendation.

2. Improves oversight of ARC's future DATA Act submissions to ensure the accuracy of the Council's data.

Management Response

Management responded that the SAO held meetings with ARC to ensure that proper oversight is in place to ensure the accuracy of the Council's data. This included reviewing ARC's internal procedures for data review and producing periodic data element reports that will be sent to the SAO for review.

OIG Comment

Management's stated actions meet the intent of our recommendation.

* * * * *

We appreciate the courtesies and cooperation provided to our staff during the audit. If you wish to discuss the report, you may contact me at (202) 927-8782 or Eleanor Kang, Audit Manager, at (202) 927-8127. Major contributors to this report are listed in appendix 6. A distribution list for this report is provided as appendix 7.

/s/

Cecilia K. Howland
Director, Financial Assistance and International Program Audits

Appendix 1: Objectives, Scope, and Methodology

Our audit objectives were to assess the (1) completeness, accuracy, timeliness, and quality of the financial and award data submitted for publication on USAspending.gov; and (2) Gulf Coast Ecosystem Restoration Council's (Council) implementation and use of the Government-wide financial data standards established by the Office of Management and Budget (OMB) and the Department of the Treasury (Treasury).

The scope of our audit included fiscal year (FY) 2019 first quarter (October, November, and December 2018) financial and award data the Council submitted for publication on USAspending.gov, and any applicable procedures, certifications, documentation, and controls to achieve this process.

To accomplish these objectives, we performed the following activities during audit fieldwork conducted from our headquarters in Washington, DC between January 2019 and September 2019:

- reviewed applicable Federal laws, regulations, and guidance, including, but not limited to:
 - P.L. 112-141, Resources and Ecosystems Sustainability, Tourist Opportunities, and Revived Economies of the Gulf Coast States Act of 2012 (RESTORE Act) (July 6, 2012);
 - P.L. 109-282, Federal Funding Accountability and Transparency Act of 2006 (September 26, 2006);
 - P.L. 113-101, Digital Accountability and Transparency Act of 2014 (DATA Act) (May 9, 2014);
 - 48 CFR 1, "Federal Acquisition Regulation";
 - *Council of the Inspectors General on Integrity and Efficiency (CIGIE) Federal Audit Executive Council (FAEC) Inspectors General Guide to Compliance Under the DATA Act* (February 14, 2019);
 - P.L. 104-208, Federal Financial Management Improvement Act of 1996 (September 30, 1996); and
 - P.L. 97-255, Federal Manager's Financial Integrity Act of 1982 (September 8, 1982).

Appendix 1: Objectives, Scope, and Methodology

- reviewed technical and informational guidance issued by Treasury’s Government-wide Project Management Office (PMO) and OMB, including:
 - DATA Act Informational Model Schema (DAIMS) Practices and Procedures For DATA Act Broker Submissions, Version 1.3.1 (February 8, 2019);
 - DAIMS Validation Rules, Version 1.3.1 (February 8, 2019);
 - DAIMS Interface Definition Document, Version 1.3.1 (February 8, 2019);
 - DAIMS Reporting Submission Specification, Version 1.3.1 (February 8, 2019);
 - OMB, M-15-12, “Increasing Transparency of Federal Spending by Making Federal Spending Data Accessible, Searchable, and Reliable” (May 8, 2015);
 - OMB, Management Procedures Memorandum (MPM) Number 2016-03, “Additional Guidance for DATA Act Implementation: Implementing Data-Centric Approach for Reporting Federal Spending Information” (May 3, 2016);
 - OMB, M-16-17, “OMB Circular No. A-123, Management’s Responsibility for Enterprise Risk Management and Internal Control” (July 15, 2016);
 - OMB, M-17-04, “Additional Guidance for DATA Act Implementation: Further Requirements for Reporting and Assuring Data Reliability” (November 4, 2016);
 - OMB, M-18-16, “Appendix A to OMB Circular No. A-123, *Management of Reporting and Data Integrity Risk*” (June 6, 2018); and
 - OMB, “Open Government Directive - Framework for the Quality of Federal Spending Information” (February 8, 2010).
- reviewed Treasury Office of Inspector General (OIG) reports, including, but not limited to:
 - Treasury OIG, *DATA Act: Council Met Reporting Requirements Under the DATA Act Despite Challenges*, OIG-18-008 (November 2, 2017);

Appendix 1: Objectives, Scope, and Methodology

- Treasury OIG, *Treasury Continues to Make Progress in Meeting DATA Act Reporting Requirements, But Data Quality Concerns Remain*, OIG-18-010R (November 8, 2017); and
- Treasury OIG, *Report on the Bureau of the Fiscal Service Administrative Resource Center's Description of its Financial Management Services and the Suitability of the Design and Operating Effectiveness of its Controls for the Period July 1, 2018 to June 30, 2019*, OIG-19-043 (August 30, 2019).
- reviewed Government Accountability Office (GAO) reports, including, but not limited to:
 - GAO, *Standards for Internal Controls in the Federal Government*, GAO-14-704G (September 2014);
 - GAO, *Reported Quality of Agencies' Spending Data Reviewed by OIGs Varied Because of Government-wide and Agency Issues*, GAO-18-546 (July 2018);
 - GAO, *DATA Act: OMB, Treasury, and Agencies Need to Improve Completeness and Accuracy of Spending Data and Disclose Limitations* GAO-18-138 (November 8, 2017);
 - GAO, *DATA Act: As Reporting Deadline Nears, Challenges Remain That Will Affect Data Quality*, GAO-17-496 (April 28, 2017);
 - GAO, *DATA Act: Office of Inspector General Reports Help Identify Agencies' Implementation Challenges*, GAO-17-460 (April 26, 2017); and
 - GAO, *Electronic Government: Implementation of the Federal Funding Accountability and Transparency Act of 2006*, GAO-10-365 (March 12, 2010).
- interviewed key personnel, including the Council's Senior Accountable Official (SAO), responsible for compliance with the DATA Act reporting requirements.
- reaffirmed our understanding of internal control related to the Council's DATA Act submission process.
- reaffirmed our understanding of the roles and responsibilities for the Council and their Federal Shared Services Provider (FSSP),

Appendix 1: Objectives, Scope, and Methodology

Treasury's Bureau of the Fiscal Service's Administrative Resource Center (ARC); grant awardees and contract recipients.

- tested data elements from the Council's certified FY 2019 first quarter DATA Act submission for completeness, accuracy, and timeliness.
- tested 100 percent of the Council's FY 2019 first quarter data for Files A-D, including two procurement and three grant awards.
- reviewed key documentation provided by Council personnel, including the Council's:
 - Organizational chart;
 - Gulf Coast Ecosystem Restoration Council DATA Quality Plan;
 - "FY 2019 Q1 - DATA Act Submission Certification Statement;"
 - FY 2019 Q1 data submission for Files A through F;
 - "DATA Act Broker Certification Instructions" Work Instructions Version 1.01;
 - "Financial Assistance Broker Submissions (FABS)" Standard Operating Procedures (SOP) Version 1.1;
 - "Award: Prepare Award" SOP Version 1.1;
 - "RAAMS Grant Payments Reconciliation Standard Operating Procedures";
 - Financial Statement Crosswalks for Government-wide Treasury Accounting Symbol (GTAS);
 - Interagency agreement between the Council and ARC for FYs 2018 and 2019;
 - "Memorandum of Understanding Between Bureau of the Fiscal Service/ARC and Gulf Coast Ecosystem Restoration Council (GCC)" (January 2018);
 - Correspondence between ARC and Council;
 - Copies of contracts and awards listed in Council's FY 2019 first quarter DATA Act submission; and
 - Final validation, reconciliation, and assurance reports.

Appendix 1: Objectives, Scope, and Methodology

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix 2: Definitions of Completeness, Accuracy, Timeliness, and Quality

Table 1: Definitions of Completeness, Accuracy, and Timeliness

Attribute	Definition
Completeness	Completeness is measured in two ways, (1) all transactions and events that should have been recorded are reentered in the proper period and (2) for each of the required data elements that should have been reported, the data element was reported in the appropriate Files A through D2.
Accuracy	Accuracy is measured as the amounts and other data relating to recorded transactions have been recorded in accordance with the DATA Act Information Model Schema (DAIMS), Reporting Submission Specification, Interface Definition Document, and the online data dictionary, and agree with the authoritative source records.
Timeliness	<p>Timeliness is measured in two ways, (1) reporting of the agency <i>Digital Accountability and Transparency Act of 2014</i> (DATA Act) submission to the Broker is in accordance with the schedule established by the Treasury DATA Act Project Management Office (PMO) and (2) for each of the required data elements that should have been reported, the data elements were reported in accordance with the reporting schedules defined by the financial, procurement, and financial assistance requirements. Specifically, to assesses the timeliness of the data elements:</p> <ul style="list-style-type: none"> (1) award financial data elements within File C should be reported within the quarter in which it occurred; (2) procurement award data elements within File D1 should be reported in the Federal Procurement Database System – Next Generation (FPDS-NG) within three business days after contract award in accordance with the Federal Acquisition Regulation (FAR) Part 4.604; and (3) financial assistance award data elements within File D2 should be reported no later than 30 days after award, in accordance with the <i>Federal Funding Accountability and Transparency Act of 2006</i> (FFATA). To facilitate the timeliness of data available on USAspending.gov, DAIMS v1.3.1 requires agencies to publish available data by the 5th of each month and ensure that prior month data is published completely, no later than the 20th of the current month.
Quality	Quality is defined as data that is complete, accurate, and reported on a timely basis.

Source: FAEC DATA Act Working Group, CIGIE FAEC Inspectors General Guide to Compliance under the DATA Act (February 14, 2019)

Appendix 3: CIGIE Reporting 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

1717 H Street, NW, Suite 825, Washington, DC 20006

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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

Appendix 4: Government-wide Financial Data Elements and Definitions

Data Element	Data Definition
Action Date	The date the action being reported was issued / signed by the Government or a binding agreement was reached.
Action Type	Description (and corresponding code) that provides information on any changes made to the Federal prime award. There are typically multiple actions for each award.
Amount of Award	The cumulative amount obligated by the Federal Government for an award, which is calculated by USAspending.gov or a successor site. For procurement and financial assistance awards except loans, this is the sum of Federal Action Obligations. For loans or loan guarantees, this is the Original Subsidy Cost.
Appropriations Account	The basic unit of an appropriation generally reflecting each unnumbered paragraph in an appropriation act. An appropriation account typically encompasses a number of activities or projects and may be subject to restrictions or conditions applicable to only the account, the appropriation act, titles within an appropriation act, other appropriation acts, or the Government as a whole. An appropriations account is represented by a Treasury Account Fund Symbol (TAFS) created by Treasury in consultation with the Office of Management and Budget. (defined in OMB Circular A-11)
Award Description	A brief description of the purpose of the award.
Award Identification (ID) Number	The unique identifier of the specific award being reported, i.e. Federal Award Identification Number (FAIN) for financial assistance and Procurement Instrument Identifier (PIID) for procurement.
Award Modification/ Amendment Number	The identifier of an action being reported that indicates the specific subsequent change to the initial award.
Award Type	Description (and corresponding code) that provides information to distinguish type of contract, grant, or loan and provides the user with more granularity into the method of delivery of the outcomes.
Awardee/Recipient Legal Entity Name	The name of the awardee or recipient that relates to the unique identifier. For U.S. based companies, this name is what the business ordinarily files in formation documents with individual states (when required).
Awardee/Recipient Unique Identifier	The unique identification number for an awardee or recipient. Currently the identifier is the 9-digit number assigned by Dun & Bradstreet referred to as the DUNS® number.
Awarding Agency Code	A department or establishment of the Government as used in the TAFS.
Awarding Agency Name	The name associated with a department or establishment of the Government as used in the TAFS.
Awarding Office Code	Identifier of the level n organization that awarded, executed or is otherwise responsible for the transaction.
Awarding Office Name	Name of the level n organization that awarded, executed or is otherwise responsible for the transaction.
Awarding Sub Tier Agency Code	Identifier of the level 2 organization that awarded, executed or is otherwise responsible for the transaction.
Awarding Sub Tier Agency Name	Name of the level 2 organization that awarded, executed or is otherwise responsible for the transaction.
Budget Authority Appropriated	A provision of law (not necessarily in an appropriations act) authorizing an account to incur obligations and to make outlays for a given purpose. Usually, but not always, an appropriation provides budget authority. (defined in OMB Circular A-11)
Business Types	A collection of indicators of different types of recipients based on socio-economic status and organization / business areas.

Appendix 4: Government-wide Financial Data Elements and Definitions

Data Element	Data Definition
Catalog of Federal Domestic Assistance (CFDA) Number	The number assigned to a Federal area of work in the Catalog of Federal Domestic Assistance.
Catalog of Federal Domestic Assistance (CFDA) Title	The title of the area of work under which the Federal award was funded in the Catalog of Federal Domestic Assistance.
Current Total Value of Award	For procurement, the total amount obligated to date on a contract, including the base and exercised options.
Federal Action Obligation	Amount of Federal Government's obligation, de-obligation, or liability, in dollars, for an award transaction.
Funding Agency Code	The 3-digit Common Government-wide Accounting Classification (CGAC) agency code of the department or establishment of the Government that provided the preponderance of the funds for an award and/or individual transactions related to an award.
Funding Agency Name	Name of the department or establishment of the Government that provided the preponderance of the funds for an award and/or individual transactions related to an award.
Funding Office Code	Identifier of the level n organization that provided the preponderance of the funds obligated by this transaction.
Funding Office Name	Name of the level n organization that provided the preponderance of the funds obligated by this transaction.
Funding Sub Tier Agency Code	Identifier of the level 2 organization that provided the preponderance of the funds obligated by this transaction.
Funding Sub Tier Agency Name	Name of the level 2 organization that provided the preponderance of the funds obligated by this transaction.
Highly Compensated Officer Name	First Name: The first name of an individual identified as one of the five most highly compensated "Executives." "Executive" means officers, managing partners, or any other employees in management positions. Middle Initial: The middle initial of an individual identified as one of the five most highly compensated "Executives." "Executive" means officers, managing partners, or any other employees in management positions. Last Name: The last name of an individual identified as one of the five most highly compensated "Executives." "Executive" means officers, managing partners, or any other employees in management positions.
Highly Compensated Officer Total Compensation	The cash and noncash dollar value earned by the one of the five most highly compensated "Executives" during the awardee's preceding fiscal year and includes the following (for more information see 17 C.F.R. § 229.402(c)(2)): salary and bonuses, awards of stock, stock options, and stock appreciation rights, earnings for services under non-equity incentive plans, change in pension value, above-market earnings on deferred compensation which is not tax qualified, and other compensation.
Legal Entity Address	The awardee or recipient's legal business address where the office represented by the Unique Entity Identifier (as registered in the System for Award Management) is located. In most cases, this should match what the entity has filed with the State in its organizational documents, if required. The address is made up of five components: Address Lines 1 and 2, City, State Code, and ZIP+4 or Postal Code.
Legal Entity Congressional District	The congressional district in which the awardee or recipient is located. This is not a required data element for non-U.S. addresses.
Legal Entity Country Code	Code for the country in which the awardee or recipient is located, using the ISO 3166-1 Alpha-3 GENC Profile, and not the codes listed for those territories and possessions of the United States already identified as "states."
Legal Entity Country Name	The name corresponding to the Country Code.
Non-Federal Funding Amount	For financial assistance, the amount of the award funded by non-Federal source(s), in dollars. Program Income (as defined in 2 C.F.R. § 200.80) is not included until such time that Program Income is generated and credited to the agreement.

Appendix 4: Government-wide Financial Data Elements and Definitions

Data Element	Data Definition
North American Industrial Classification System (NAICS) Code	The identifier that represents the North American Industrial Classification System Code assigned to the solicitation and resulting award identifying the industry in which the contract requirements are normally performed.
North American Industrial Classification System (NAICS) Description	The title associated with the NAICS Code.
Object Class	Categories in a classification system that presents obligations by the items or services purchased by the Federal Government. Each specific object class is defined in OMB Circular A-11 § 83.6. (defined in OMB Circular A-11)
Obligation	Obligation means a legally binding agreement that will result in outlays, immediately or in the future. When you place an order, sign a contract, award a grant, purchase a service, or take other actions that require the Government to make payments to the public or from one Government account to another, you incur an obligation. It is a violation of the Anti-deficiency Act (31 U.S.C. § 1341(a)) to involve the Federal Government in a contract or obligation for payment of money before an appropriation is made, unless authorized by law. This means you cannot incur obligations in a vacuum; you incur an obligation against budget authority in a Treasury account that belongs to your agency. It is a violation of the Anti-deficiency Act to incur an obligation in an amount greater than the amount available in the Treasury account that is available. This means that the account must have budget authority sufficient to cover the total of such obligations at the time the obligation is incurred. In addition, the obligation you incur must conform to other applicable provisions of law, and you must be able to support the amounts reported by the documentary evidence required by 31 U.S.C. § 1501. Moreover, you are required to maintain certifications and records showing that the amounts have been obligated (31 U.S.C. § 1108). The following subsections provide additional guidance on when to record obligations for the different types of goods and services or the amount. Additional detail is provided in Circular A-11.
Ordering Period End Date	For procurement, the date on which, for the award referred to by the action being reported, no additional orders referring to it may be placed. This date applies only to procurement indefinite delivery vehicles (such as indefinite delivery contracts or blanket purchase agreements). Administrative actions related to this award may continue to occur after this date. The period of performance end dates for procurement orders issued under the indefinite delivery vehicle may extend beyond this date.
Other Budgetary Resources	New borrowing authority, contract authority, and spending authority from offsetting collections provided by Congress in an appropriations act or other legislation, or unobligated balances of budgetary resources made available in previous legislation, to incur obligations and to make outlays. (defined in OMB Circular A-11)
Outlay	Payments made to liquidate an obligation (other than the repayment of debt principal or other disbursements that are "means of financing" transactions). Outlays generally are equal to cash disbursements but also are recorded for cash-equivalent transactions, such as the issuance of debentures to pay insurance claims, and in a few cases are recorded on an accrual basis such as interest on public issues of the public debt. Outlays are the measure of Government spending. (defined in OMB Circular A-11)
Parent Award Identification (ID) Number	The identifier of the procurement award under which the specific award is issued, such as a Federal Supply Schedule. This data element currently applies to procurement actions only.
Period of Performance Current End Date	The current date on which, for the award referred to by the action being reported, awardee effort completes or the award is otherwise ended. Administrative actions related to this award may continue to occur after this date. This date does not apply to procurement indefinite delivery vehicles under which definitive orders may be awarded.

Appendix 4: Government-wide Financial Data Elements and Definitions

Data Element	Data Definition
Period of Performance Potential End Date	For procurement, the date on which, for the award referred to by the action being reported if all potential pre-determined or pre-negotiated options were exercised, awardee effort is completed or the award is otherwise ended. Administrative actions related to this award may continue to occur after this date. This date does not apply to procurement indefinite delivery vehicles under which definitive orders may be awarded.
Period of Performance Start Date	The date on which, for the award referred to by the action being reported, awardee effort begins or the award is otherwise effective.
Potential Total Value of Award	For procurement, the total amount that could be obligated on a contract, if the base and all options are exercised
Primary Place of Performance Address	The address where the predominant performance of the award will be accomplished. The address is made up of four components: City, State Code, and ZIP+4 or Postal Code.
Primary Place of Performance Congressional District	U.S. congressional district where the predominant performance of the award will be accomplished. This data element will be derived from the Primary Place of Performance Address.
Primary Place of Performance Country Code	Country code where the predominant performance of the award will be accomplished.
Primary Place of Performance Country Name	Name of the country represented by the country code where the predominant performance of the award will be accomplished.
Program Activity	A specific activity or project as listed in the program and financing schedules of the annual budget of the United States Government. (defined in OMB Circular A-11)
Record Type	Code indicating whether an action is an individual transaction or aggregated. This data element applies to financial assistance only.
Treasury Account Symbol (excluding sub-account)	Treasury Account Symbol: The account identification codes assigned by the Department of the Treasury to individual appropriation, receipt, or other fund accounts. All financial transactions of the Federal Government are classified by TAS for reporting to the Department of the Treasury and the Office of Management and Budget. (defined in OMB Circular A-11) Treasury Appropriation Fund Symbol: The components of a Treasury Account Symbol – allocation agency, agency, main account, period of availability and availability type – that directly correspond to an appropriations account established by Congress. (defined in OMB Circular A-11)
Ultimate Parent Legal Entity Name	The name of the ultimate parent of the awardee or recipient. Currently, the name is from the global parent DUNS® number.
Ultimate Parent Unique Identifier	The unique identification number for the ultimate parent of an awardee or recipient. Currently the identifier is the 9-digit number maintained by Dun & Bradstreet as the global parent DUNS® number.
Unobligated Balance	Unobligated balance means the cumulative amount of budget authority that remains available for obligation under law in unexpired accounts at a point in time. The term "expired balances available for adjustment only" refers to unobligated amounts in expired accounts. Additional detail is provided in Circular A-11.

Source: OMB, "Federal Spending Transparency Data Standards,"
<https://portal.max.gov/portal/assets/public/offm/DataStandardsFinal.htm>

Appendix 5: Management Response



Gulf Coast Ecosystem Restoration Council

October 29, 2019

Richard K. Delmar
Acting Inspector General
Department of the Treasury

Re: Response to the OIG Audit Report: DATA Act: Council Met DATA Act Reporting Requirements but Data Accuracy Could be Improved.

Thank you for the opportunity to review DATA Act: Council Met DATA Act Reporting Requirements but Data Accuracy Could be Improved (OIG-20-0XX). The Council agrees with the report that Council's FY 2019 first quarter data submission met the standards for completeness, accuracy, timeliness, and was of higher quality (i.e., contained less than 20 percent errors) and that the Council fully implemented and used the Government-wide financial data standards established by OMB and Treasury in August 2015.

The Council concurs that while the Council's FY 2019 first quarter data was found to be of higher quality, there were errors in certain procurement data elements of the Council's data submission. As a result, the Senior Accountable Official (SAO) worked with Bureau of the Fiscal Service's Administrative Resource Center (ARC) to correct these errors. The SAO held meetings with ARC to ensure that proper oversight is in place to ensure the accuracy of the Council's data. This included reviewing ARC's internal procedures for data review and producing periodic data element reports that will be sent to the SAO for review.

These actions will work to prevent errors in the Council's data submissions and continue to comply with data standards established by OMB and Treasury.

Sincerely,

BENJAMIN SCAGGS
Ben Scaggs
Executive Director

Digitally signed by
BENJAMIN SCAGGS
Date: 2019.10.29
09:02:01 -0500

Appendix 6: Major Contributors to This Report

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Appendix 7: Report Distribution

Gulf Coast Ecosystem Restoration Council

Department of Agriculture Designee
Department of the Army Council Designee
Department of Commerce Council Designee
Environmental Protection Agency Council Designee
Department of Homeland Security Council Member
Department of the Interior Council Designee
State of Alabama Council Designee
State of Florida Council Designee
State of Louisiana Council Designee
State of Mississippi Council Designee
State of Texas Council Designee

Department of the Treasury

Deputy Secretary
Under Secretary for Domestic Finance
Fiscal Assistant Secretary
Deputy Assistant Secretary, Fiscal Operations and Policy

Office of Management and Budget

Office of Inspector General Budget Examiner

U.S. Senate

Chairman and Ranking Member
Committee on Environment and Public Works

Chairman and Ranking Member
Committee on Commerce, Science, and Transportation

Chairman and Ranking Member
Committee on Energy and Natural Resources

Chairman and Ranking Member
Committee on Appropriations

Chairman and Ranking Member
Committee on Homeland Security and Governmental Affairs

Chairman and Ranking Member
Committee on the Budget

Appendix 7: Report Distribution

U.S. House of Representatives

Chairman and Ranking Member
Committee on Science, Space, and Technology

Chairman and Ranking Member
Committee on Natural Resources

Chairman and Ranking Member
Committee on Transportation and Infrastructure

Chairman and Ranking Member
Committee on Appropriations

Chairman and Ranking Member
Committee on Oversight and Reform

Chairman and Ranking Member
Committee on the Budget

U.S. Government Accountability Office

Comptroller General of the United States

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